
Appendix A – Public Involvement for the
Final Dredged Material Management Plan and
Final Programmatic Environmental Impact Statement

Long Island Sound Connecticut, New York and Rhode Island



US ARMY CORPS
OF ENGINEERS
New England District

December 2015

LONG ISLAND SOUND

FINAL

DREDGED MATERIAL MANAGEMENT PLAN

AND FINAL PROGRAMMATIC

ENVIRONMENTAL IMPACT STATEMENT

APPENDIX A

PUBLIC INVOLVEMENT AND

PERTINENT CORRESPONDENCE

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USACE, NAD – Final DMMP/PEIS Transmittal Letters – December 31, 2015	
USACE, NAD – Final Report Approval Memo to NAE – December 11, 2015	
USACE, NAE – Final Draft Report Transmittal Memo to NAD – November 30, 2015	
USACE, NAD – Final Report Approval Memo to NAE – November 10, 2015	

Part 1B – Continued State and Agency Coordination Letters Received After Closure of the Public Review Period and During Preparation of the Final DMMP/PEIS

NY Department of State – Letter to NAE on CZM Jurisdiction – November 4, 2015
USACE, Director of Civil Works – Response to CT General Assembly – October 21, 2015
New England District – Letter to NY DOS on CZM Consistency – October 21, 2015
USACE, Director of Civil Works – Response to CT Congressional Delegation – Oct 17, 2015

Part 2A – Correspondence Received during Public Review of the Draft DMMP/PEIS

U.S. Environmental Protection Agency, Region I – Letter to NAE – October 16, 2015
NY Departments of State & Environmental Conservation – Joint Letter to NAE – Oct 16, 2015
Louis Sulla, White Plains, NY – Letter to NAE – October 16, 2015
Carla Bednarsky, Shelton, CT – Letter to NAE – October 16, 2015
Connecticut Fund for the Environment/Save the Sound – Letter to NAE – October 16, 2015
David Elliot, Greenwich, CT – Letter to NAE – October 16, 2015
Mark Magda, Riverside, CT – Letter to NAE – Forwarded October 16, 2015
Robin Magda, Riverside, CT – Letter to NAE – Forwarded October 16, 2015
S.T., Greenwich, CT – Letter to NAE – Forwarded October 16, 2015
Lisa Lee, Mineola, NY – Letter to NAE – October 16, 2015
Steven Villardi, East Rockaway, NY – Letter to NAE – Forwarded October 16, 2015
Estelle & Emanuel Scarpinato, Muttontown, NY – Letter to NAE – Forwarded Oct 16, 2015
Martin Sass, Sand Point, NY – Letter to NAE – Forwarded October 16, 2015
Jeremy Barth, Glenwood Landing, NY – Letter to NAE – Forwarded October 16, 2015
Steven A., Glen Cove, NY – Letter to NAE – Forwarded October 16, 2015
Town of North Hempstead, NY – Letter to NAE – October 16, 2015
James Bogden, Orient, NY – Email to NAE – October 16, 2015
Hugh and Susan Switzer, Peconic, NY – Email to NAE – October 16, 2015
Mark Webb, Stratford, CT – Letter to NAE – Forwarded October 16, 2015
Virginia Sigona, Stratford, CT – Letter to NAE – Forwarded October 16, 2015
Raymond Signore, Stratford, CT – Letter to NAE – Forwarded October 16, 2015
Michael Patria, Stratford, CT – Letter to NAE – Forwarded October 16, 2015
John Work, New Canaan, CT – Letter to NAE – Forwarded October 16, 2015
Stephen MacLean, Trumbull, CT – Letter to NAE – Forwarded October 16, 2015
Ken Sayers, Ridgefield, CT – Letter to NAE – Forwarded October 16, 2015
John Signore, Stratford, CT – Letter to NAE – Forwarded October 16, 2015
Rodney Tomey, Shelton, CT – Letter to NAE – Forwarded October 16, 2015
Russ Galtieri, Danbury, CT – Letter to NAE – Forwarded October 16, 2015
Shari Herman, Stratford, CT – Letter to NAE – Forwarded October 16, 2015
Caitlin Watters, Milford, CT – Letter to NAE – Forwarded October 16, 2015
Rod Swift, Branford, CT – Letter to NAE – Forwarded October 16, 2015
Michael Whitman, Monroe, CT – Letter to NAE – Forwarded October 16, 2015
Joshua Twidwell, Stratford, CT – Letter to NAE – Forwarded October 16, 2015
Geimar Martinea, Bridgeport, CT – Letter to NAE – Forwarded October 16, 2015
James Injavchock, Stratford, CT – Letter to NAE – Forwarded October 16, 2015
Brandon Michael, Milford, CT – Letter to NAE – Forwarded October 16, 2015

Jason Arenberg, Hamden, CT – Letter to NAE – Forwarded October 16, 2015
 Edward Miller, Wallingford, CT – Letter to NAE – Forwarded October 16, 2015
 Rita L., Nassau, NY – Letter to NAE – October 16, 2015
 Barbara Schoenenberger, Mineola, NY – Letter to NAE – October 16, 2015
 Mary Wiercinski, Mineola, NY – Letter to NAE – October 16, 2015
 Peter Van Velsor, Mineola, NY – Letter to NAE – October 16, 2015
 Linda Gorman, Mineola, NY – Letter to NAE – October 16, 2015
 Lynn Gelan, Plainview, NY – Letter to NAE – October 16, 2015
 Jason Gorman, Mineola, NY – Letter to NAE – October 16, 2015
 Stacy Leekler, Mineola, NY – Letter to NAE – October 16, 2015
 Andrew Paulus, Stamford, CT – Letter to NAE – October 16, 2015
 John Sileo, Stamford, CT – Letter to NAE – October 16, 2015
 Joe & Mary Ayles, Shelton, CT – Letter to NAE – October 16, 2015
 Amy Haverly, Barrington, RI – Letter to NAE – Forwarded October 16, 2015
 Paul Dennis, Warren, RI – Letter to NAE – Forwarded October 16, 2015
 Raymond Snow, Warwick, RI – Letter to NAE – Forwarded October 16, 2015
 Town of Oyster Bay, NY – Letter to NAE – October 16, 2015
 Nancy O'Neill, Old Greenwich, CT – Letter to NAE – October 16, 2015
 William O'Neill, Old Greenwich, CT – Letter to NAE – October 16, 2015
 Leonard Borkowski, Old Saybrook, CT – Letter to NAE – October 16, 2015
 Janet Cuna, Freeport, ME – Letter to NAE – Forwarded October 16, 2015
 Robert G., Falmouth, ME – Letter to NAE – Forwarded October 16, 2015
 Kristen Peterson, Freeport, ME – Letter to NAE – Forwarded October 16, 2015
 Stephen (Illegible), South Portland, ME – Letter to NAE – Forwarded October 16, 2015
 Rami Bagdadi, Medford, NY – Letter to NAE – October 16, 2015
 Raymond Morton, Stratford, CT – Letter to NAE – October 16, 2015
 Connecticut Harbor Management Association – Letter to NAE – October 15, 2015
 North Fork Environmental Council, Mattituck, NY – Letter to NAE – October 15, 2015
 New England District – Letter to NY DOS on Comment Period – October 15, 2015
 New England District – Letter to NY DEC on Comment Period – October 15, 2015
 David Henriques, NY – Email to NAE – October 15, 2015
 Coastline Consulting and Development LLC, Mark Jackson – Letter to NAE – Oct 15, 2015
 Carl Freeman, CT – Letter to NAE – October 15, 2015
 American Boating Services, Deep River, CT – Letter to NAE – October 15, 2015
 Town of Greenwich, CT, Dept of Parks and Recreation – Letter to NAE – October 15, 2015
 Town of Greenwich, CT, Shellfish Commission – Letter to NAE – October 15, 2015
 Roberg Associates, Stratford, CT – Letter to NAE – October 15, 2015
 Philip Catalano, Greenwich, CT – Email to NAE – October 15, 2015
 Milford Boat Works, CT (Nancy Bennett) – Letter to NAE – October 15, 2015
 Greg Morea – Email to NAE – October 15, 2015
 Greg Crocker, Crocker's Boat Yard, New London, CT – Email to NAE – October 15, 2015
 George Carey, Closter, NJ – Letter to NAE – October 15, 2015
 Brewer Boston Post Boat Yard, Mamaroneck, NY – Letter to NAE – October 15, 2015
 A.D., Bronx, NY – Letter to NAE – Forwarded October 15, 2015
 Illegible, Mamaroneck, NY – Letter to NAE – Forwarded October 15, 2015
 David LaRusso, Mamaroneck, NY – Letter to NAE – Forwarded October 15, 2015
 Paul Latella, Harrison, NY – Letter to NAE – Forwarded October 15, 2015

Shehan Fernando, Harrison, NY – Letter to NAE – Forwarded October 15, 2015
 K. Hill, Mamaroneck, NY – Letter to NAE – Forwarded October 15, 2015
 Illegible – Letter to NAE – Forwarded October 15, 2015
 J. (Illegible), Rye, NY – Letter to NAE – Forwarded October 15, 2015
 Paul Muenzinger, Mamaroneck, NY – Letter to NAE – Forwarded October 15, 2015
 John Brewer, Jr., Stamford, CT – Letter to NAE – Forwarded October 15, 2015
 Bonnie Cassone, Greenwich, CT – Letter to NAE – October 15, 2015
 E.R. Keogh, Greenport, NY – Letter to NAE – October 15, 2015
 Ron Mirando, Stamford, CT – Letter to NAE – October 15, 2015
 Brewer Dauntless Shipyard (Doug Domenie), Essex CT – Letter to NAE – October 15, 2015
 Sydney Kingsbury, Essex, CT – Letter to NAE – October 15, 2015
 Anthony Fasceon, Deep River, CT – Letter to NAE – October 15, 2015
 Larry Brainard, East Haddam, CT – Letter to NAE – October 15, 2015
 Frank Spakoski, III, Groton, CT – Letter to NAE – October 15, 2015
 Gary Langloir, Jewett City, CT – Letter to NAE – October 15, 2015
 Christopher Marrs, Deep River, CT – Letter to NAE – October 15, 2015
 Matthew Beck, East Hampton, CT – Letter to NAE – October 15, 2015
 Douglas Sieffert, Clinton, CT – Letter to NAE – October 15, 2015
 Henry Domenie, Essex, CT – Letter to NAE – October 15, 2015
 Jeff M., Moodus, CT – Letter to NAE – October 15, 2015
 Marcos Santana, Westbrook, CT – Letter to NAE – October 15, 2015
 Piotri Pedzich, Essex, CT – Letter to NAE – October 15, 2015
 Stacy Stachura, Old Saybrook, CT – Letter to NAE – October 15, 2015
 The Tamlse Family, Massapequa, NY – Letter to NAE – October 15, 2015
 Steven Migliore, Massapequa, NY – Letter to NAE – October 15, 2015
 Mark Frize, Sea Cliff, NY – Letter to NAE – Forwarded October 15, 2015
 Thomas Tishe, Babylon, NY – Letter to NAE – Forwarded October 15, 2015
 Nicholas Muzante, Glen Cove, NY – Letter to NAE – Forwarded October 15, 2015
 Andre Zarotin, Glen Cove, NY – Letter to NAE – Forwarded October 15, 2015
 Daniel Satavia, Brentwood, NY – Letter to NAE – Forwarded October 15, 2015
 Hilario Salmeron, Oyster Bay, NY – Letter to NAE – Forwarded October 15, 2015
 Angel M., Brentwood, NY – Letter to NAE – Forwarded October 15, 2015
 Moises, Glen Cove, NY – Letter to NAE – Forwarded October 15, 2015
 Rodolfo Ramirez, Jr., Glen Cove, NY – Letter to NAE – Forwarded October 15, 2015
 Vinoqde Bissoondial, South Richmond Hill, NY – Letter to NAE – Forwarded Oct 15, 2015
 Peter Lukens, Islip Terrace, NY – Letter to NAE – Forwarded October 15, 2015
 Vinnie Sedev, Glen Cove, NY – Letter to NAE – Forwarded October 15, 2015
 Danny Babic, Port Washington, NY – Letter to NAE – Forwarded October 15, 2015
 Paul Bottone, Glen Cove, NY – Letter to NAE – Forwarded October 15, 2015
 Anthony Matzkewitz, Richmond Hill, NY – Letter to NAE – Forwarded October 15, 2015
 Paul Bottone, Locust Valley, NY – Letter to NAE – Forwarded October 15, 2015
 Brewer Wickford Cove Marina – Email to NAE with Letters – October 15, 2015
 W. Larry Colartuono, Portsmouth, RI – Letter to NAE – October 15, 2015
 Vincent Belotti, Cumberland, RI – Letter to NAE – October 15, 2015
 Mark Stevens, Barrington, RI – Letter to NAE – October 15, 2015
 Kelsey Stanton, Cumberland, RI – Letter to NAE – October 15, 2015
 Casey M., North Kingstown, RI – Letter to NAE – October 15, 2015

Zachary C., Coventry, RI – Letter to NAE – October 15, 2015
 C.W., Warwick, RI – Letter to NAE – October 15, 2015
 Lana Gaston, Niantic, CT – Letter to NAE – October 15, 2015
 D.H., North Kingston, RI – Letter to NAE – October 15, 2015
 Joshua Matteson, Exeter, RI – Letter to NAE – October 15, 2015
 Christopher W., Coventry, RI – Letter to NAE – October 15, 2015
 John Guerrero, Portsmouth, RI – Letter to NAE – October 15, 2015
 Standard Marine (John S.), Saunderstown, RI – Letter to NAE – October 15, 2015
 D. Reid, West Warwick, RI – Letter to NAE – October 15, 2015
 Heather Houlihan, Narragansett, RI – Letter to NAE – October 15, 2015
 Illegible, Shleton, CT – Letter to NAE – Forwarded October 15, 2015
 Valerie Stasalovich, Shelton, CT – Letter to NAE – Forwarded October 15, 2015
 Armida Budd, Shelton, CT – Letter to NAE – Forwarded October 15, 2015
 Illegible, Shleton, CT – Letter to NAE – Forwarded October 15, 2015
 Paul & Lisa Cioffi, Shelton, CT – Letter to NAE – Forwarded October 15, 2015
 Steven Wachner, Bayville, NY – Letter to NAE – Forwarded October 15 2015
 Oscar Guerrero, Uniondale, NY – Letter to NAE – Forwarded October 15 2015
 Juan Salinas, Brentwood, NY – Letter to NAE – Forwarded October 15 2015
 Francisco Rivas, Hempstead, NY – Letter to NAE – Forwarded October 15 2015
 Hugo Murillo, Hempstead, NY – Letter to NAE – Forwarded October 15 2015
 William Truss, Port Washington, NY – Letter to NAE – Forwarded October 15 2015
 Carly Machicote, Glen Cove, NY – Letter to NAE – Forwarded October 15 2015
 Michael Dunn, Glen Cove, NY – Letter to NAE – Forwarded October 15 2015
 Jing Wang, Manhasset, NY – Letter to NAE – Forwarded October 15 2015
 Loren Panowich, Glen Head, NY – Letter to NAE – Forwarded October 15 2015
 Regina Kurz, Bethpage, NY – Letter to NAE – Forwarded October 15 2015
 Jason Kulczyk, Bay Shore, NY – Letter to NAE – October 15 2015
 Janine Wagner, Massapequa Park, NY – Letter to NAE – October 15 2015
 Tracie Shard, Massapequa, NY – Letter to NAE – October 15 2015
 Theresa Berzler, Massapequa Park, NY – Letter to NAE – October 15 2015
 Nancy Edwards, NY – Letter to NAE – October 15 2015
 Cindy Murphy, Massapequa Park, NY – Letter to NAE – October 15 2015
 Stephen M., Massapequa Park, NY – Letter to NAE – October 15 2015
 Melissa McSherry-Kelly, Massapequa Park, NY – Letter to NAE – October 15 2015
 Aiden Kelly, Massapequa Park, NY – Letter to NAE – October 15 2015
 Michael Kelly, Massapequa Park, NY – Letter to NAE – October 15 2015
 Rebecca McSherry, Massapequa Park, NY – Letter to NAE – October 15 2015
 James McSherry, Massapequa Park, NY – Letter to NAE – October 15 2015
 Massapequa Park, NY – Letter to NAE – October 15 2015
 Thomas Eckert, Massapequa Park, NY – Letter to NAE – October 14 2015
 Sharon Gleason, NY – Letter to NAE – October 14 2015
 Sean Gleason, NY – Letter to NAE – October 14 2015
 Terrance Gleason, NY – Letter to NAE – October 14 2015
 Brandon Gleason, NY – Letter to NAE – October 14 2015
 Polly Sanna, Cos Cob, CT – Email to NAE – October 14, 2015
 Harry Watson, Groton, CT – Email to NAE – October 14, 2015
 Edward Cosden, Noank, CT – Letter to NAE – October 14, 2015

Craig Anderson, Wethersfield, CT – Email to NAE – October 14, 2015
 Carmine DeVita, Greenwich, CT – Email to NAE – October 14, 2015
 Capt. Gary Schmid, Mystic, CT – Email to NAE – October 14, 2015
 Beth Sklar, Niantic, CT – Email to NAE – October 14, 2015
 Amy Fishkow, Stamford, CT – Letter to NAE – Forwarded October 14, 2015
 Diane Morelli, Stamford, CT – Letter to NAE – Forwarded October 14, 2015
 Maria Belmonte, Stamford, CT – Letter to NAE – Forwarded October 14, 2015
 Yordan Hariskov, Stamford, CT – Letter to NAE – Forwarded October 14, 2015
 David Kinney, Glastonbury, CT – Letter to NAE – Forwarded October 14, 2015
 Natalie Collins, Bristol, CT – Letter to NAE – Forwarded October 14, 2015
 Lorraine Dupont, Enfield, CT – Letter to NAE – Forwarded October 14, 2015
 Matthew Trant, Colchester, CT – Letter to NAE – Forwarded October 14, 2015
 William Greer, Avon, CT – Letter to NAE – Forwarded October 14, 2015
 Brendon Kelsey, Glastonbury, CT – Letter to NAE – Forwarded October 14, 2015
 Reves Potts, Brewer Yacht Yards, Westbrook, CT – Letter to NAE – October 14, 2015
 Denise Curiale, Massapequa Park, NY – Letter to NAE – October 14, 2015
 Salvatore Curiale, Massapequa Park, NY – Letter to NAE – October 14, 2015
 Janine Curiale, Massapequa Park, NY – Letter to NAE – October 14, 2015
 Andrew Curiale, Massapequa Park, NY – Letter to NAE – October 14, 2015
 Mary Koshap-Petraco, Massapequa Park, NY – Letter to NAE – Forwarded October 14, 2015
 Eileen Dustio, NY – Letter to NAE – Forwarded October 14, 2015
 Cynthia (Illegible), NY – Letter to NAE – Forwarded October 14, 2015
 Anonymous, NY – Letter to NAE – Forwarded by CCE October 14, 2015
 Leah Conis, NY – Letter to NAE – Forwarded October 14, 2015
 Todd Conis, NY – Letter to NAE – Forwarded October 14, 2015
 Samuel Rispoli, Hampton Bays, NY – Letter to NAE – October 14, 2015
 Sam Knoblock, Kingston, MA – Letter to NAE – Forwarded October 14, 2015
 William O'Doherty, Edgartown, MA – Letter to NAE – Forwarded October 14, 2015
 David Johnson, Halifax, MA – Letter to NAE – Forwarded October 14, 2015
 Stephen Saja, Plymouth, MA – Letter to NAE – Forwarded October 14, 2015
 James Higgins, Plymouth, MA – Letter to NAE – Forwarded October 14, 2015
 Timothy Wall, Sandwich, MA – Letter to NAE – Forwarded October 14, 2015
 Janet Berg, Scituate, MA – Letter to NAE – Forwarded October 14, 2015
 General Dynamics, Electric Boat, Groton, CT – Letter to NAE – October 14, 2015
 Holth & Kollman, LLC, New London, CT – Letter to NAE – October 14, 2015
 Andrew (Illegible), NY – Letter to NAE – Forwarded by Greenport YY – October 14, 2015
 Roger Clark, NY – Letter to NAE – Forwarded by Greenport YY – October 14, 2015
 Illegible, NY – Letter to NAE – Forwarded by Greenport YY – October 14, 2015
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 Illegible, NY – Letter to NAE – October 14, 2015
 William Barbella & Mary Bridges, North Massapequa, NY – Letter to NAE – Oct 14, 2015
 Albert Kalimian, Locust Valley, NY – Letter to NAE – October 14, 2015
 Anthony Rispoli, Hampton Bays, NY – Letter to NAE – October 14, 2015
 Charles Harless, Stamford, CT – Letter to NAE – October 14, 2015
 Cecilio Rivers, New Haven, CT – Letter to NAE – October 14, 2015
 Donald Bennett, Speonk, NY – Letter to NAE – October 14, 2015
 Maralla Bennett, Westhampton, NY – Letter to NAE – October 14, 2015

Joseph Reiter, Cutchoque, NY – Letter to NAE – October 14, 2015
 Michael Ambrozino, Cromwell, CT – 4 Identical Letters to NAE – October 14, 2015
 Mike Acebo, East Marion, NY – Letter to NAE – October 14, 2015
 Michael Glasfeld, Mystic, CT – Letter to NAE – October 14, 2015
 Thomas Vaughan, Williston Park, NY – Letter to NAE – October 14, 2015
 Philip Brucia, NY – Letter to NAE – October 14, 2015
 Louis Breittagh, North Massapequa, NY – Letter to NAE – Oct 14, 2015
 Michael Nastri, NY – Letter to NAE – October 14, 2015
 Greg Lane, North Massapequa, NY – Letter to NAE – October 14, 2015
 Tim Visel, Ivoryton, CT – Email to NAE – October 14, 2015
 Citizens Campaign for the Environment, Farmington, NY – Email to NAE – Oct 14, 2015
 Emily May, Lloyd Harbor, NY – Letter to NAE – October 14, 2015
 Steve B., Manhasset, NY – Letter to NAE – Forwarded October 14, 2015
 Ruth & Marvin Meirs, Commack, NY – Letter to NAE – Forwarded October 14, 2015
 James Stundis, NY – Letter to NAE – Forwarded October 14, 2015
 The Platts Family, North Stamford, CT – Letter to NAE – Forwarded October 14, 2015
 Illegible – Letter to NAE – Forwarded October 14, 2015
 Elizabeth Attens, Willingford, CT – Letter to NAE – Forwarded October 14, 2015
 Maureen Menner, Stamford, CT – Letter to NAE – Forwarded October 14, 2015
 Town of Guilford, CT, Marina Commission – Letter to NAE – October 13, 2015
 Maureen Kennedy, Williston Park, NY – Letter to NAE – October 13, 2015
 Chris Aspinall, Manhasset, NY – Letter to NAE – October 13, 2015
 Brewer Yacht Yard Group, Warwick, RI – Letter to NAE – October 13, 2015
 Janet Hitschler, Commack, NY – Letter to NAE – October 13, 2015
 Patricia O’Brien, NY – Letter to NAE – October 13, 2015
 Stephen Soule, Stamford, CT – Letter to NAE – October 13, 2015
 Elinor Spohn, Orient Point, NY – Letter to NAE – October 13, 2015
 Janet Levinson, Manhasset, NY – Letter to NAE – October 13, 2015
 Kenneth Steere, Jr., Noank, CT – Letter to NAE – October 13, 2015
 Peter Zeale, Greenwich, CT – Letter to NAE – October 13, 2015
 Dean Capparelle, Cos Cob, CT – Letter to NAE – October 13, 2015
 Phyllis Capparelle, Cos Cob, CT – Letter to NAE – October 13, 2015
 John Champion, Jr., CT – Letter to NAE – Forwarded by Saybrook Pt – October 13, 2015
 Theodore Rosen, Woodbury, CT – Letter to NAE – Forwarded October 13, 2015
 Gary Aceto, West Haven, CT – Letter to NAE – Forwarded October 13, 2015
 Manhasset Bay Protection Committee – Letter to NAE – October 13, 2015
 David Anderson, Louis Marine LTD, Westbrook, CT – Letter to NAE – FW October 13, 2015
 Mike Bassett, Ivoryton, CT – Letter to NAE – Forwarded October 13, 2015
 Timothy Bassett, Ivoryton, CT – Letter to NAE – Forwarded October 13, 2015
 Penny Reno, Clinton, CT – Letter to NAE – Forwarded October 13, 2015
 Walter Nuzzolo, Hamden, CT – Letter to NAE – Forwarded October 13, 2015
 Illegible, Windsor, CT – Letter to NAE – Forwarded October 13, 2015
 Emilio Randolph, Waterford, CT – Letter to NAE – Forwarded October 13, 2015
 John Kothman, Killingworth, CT – Letter to NAE – Forwarded October 13, 2015
 Katrice Angier, East Lyme, CT – Letter to NAE – Forwarded October 13, 2015
 Tracy Barkette, Higganum, CT – Letter to NAE – Forwarded October 13, 2015
 Joseph Theic, Waterford, CT – Letter to NAE – Forwarded October 13, 2015

Dirk Plas, East Haddam, CT – Letter to NAE – Forwarded October 13, 2015
 William Comeau, Clinton, CT – Letter to NAE – Forwarded October 13, 2015
 Steven Rosen, Rocky Hill, CT – Letter to NAE – Forwarded October 13, 2015
 William Spade, Cromwell, CT – Letter to NAE – Forwarded October 13, 2015
 Mike S., Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 Barbara Perkins, Niantic, CT – Letter to NAE – Forwarded October 13, 2015
 P.L., Clinton, CT – Letter to NAE – Forwarded October 13, 2015
 Emelio A, East Haven, CT – Letter to NAE – Forwarded October 13, 2015
 Marc Crawford, Griswold, CT – Letter to NAE – Forwarded October 13, 2015
 Maria Rivera, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 Reginald P., CT – Letter to NAE – Forwarded October 13, 2015
 Leodegario Velazquez, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 Hector Rivera, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 Carlos Flores, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 Briana Capobianco, Branford, CT – Letter to NAE – Forwarded October 13, 2015
 Illegible, Windsor, CT – Letter to NAE – Forwarded October 13, 2015
 Ron Cook, Newington, CT – Letter to NAE – Forwarded October 13, 2015
 Lee B., Newington, CT – Letter to NAE – Forwarded October 13, 2015
 Martin Stroder, Wethersfield, CT – Letter to NAE – Forwarded October 13, 2015
 Illegible, Glastonbury, CT – Letter to NAE – Forwarded October 13, 2015
 Lindley Cordelet, Mystic, CT – Letter to NAE – Forwarded October 13, 2015
 Alan Rosenblatt, West Hartford, CT – Letter to NAE – Forwarded October 13, 2015
 Chris Miller, Colchester, CT – Letter to NAE – Forwarded October 13, 2015
 W.M. Winterer, Essex, CT – Letter to NAE – Forwarded October 13, 2015
 Doug Paul, Essex, CT – Letter to NAE – Forwarded October 13, 2015
 Juan Mariani, Southbury, CT – Letter to NAE – Forwarded October 13, 2015
 Ward Kipp, Simsbury, CT – Letter to NAE – Forwarded October 13, 2015
 D. S., Ansonia, CT – Letter to NAE – Forwarded October 13, 2015
 Jeff Frechette, Chesterfield, MA – Letter to NAE – Forwarded October 13, 2015
 Severio Mouciri, West Granby, CT – Letter to NAE – Forwarded October 13, 2015
 John Kleinhans, Niantic, CT – Letter to NAE – Forwarded October 13, 2015
 G. Burns, Jr., Ballston Spa, NY – Letter to NAE – Forwarded October 13, 2015
 Anton Satilon, Stonington, CT – Letter to NAE – Forwarded October 13, 2015
 Elizabeth Davey, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 Nancy Wahl, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 Barbara Faretine, Westbrook, CT – Letter to NAE – Forwarded October 13, 2015
 Sybil Nassan, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 Chris Loader, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 Lorraine Corso, Norwalk, CT – Letter to NAE – Forwarded October 13, 2015
 Matthew Dunn, Middletown, CT – Letter to NAE – Forwarded October 13, 2015
 Sandra Bannon, Killingworth, CT – Letter to NAE – Forwarded October 13, 2015
 Sal Foglia, Stamford, CT – Letter to NAE – Forwarded October 13, 2015
 R. Wellemeter, East Lyme, CT – Letter to NAE – Forwarded October 13, 2015
 Greg Chapman, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 Maria Souza, East Lyme, CT – Letter to NAE – Forwarded October 13, 2015
 Kelly Cline, Chester, CT – Letter to NAE – Forwarded October 13, 2015
 Terri Grelbstein, Greenwich, CT – Letter to NAE – Forwarded October 13, 2015

Jonathan Turley, New Haven, CT – Letter to NAE – Forwarded October 13, 2015
Jonathan Turley, Jr., West Haven, CT – Letter to NAE – Forwarded October 13, 2015
Doug Screv, Niantic, CT – Letter to NAE – Forwarded October 13, 2015
Raymond Horte, Mystic, CT – Letter to NAE – Forwarded October 13, 2015
Joseph Jean, New Haven, CT – Letter to NAE – Forwarded October 13, 2015
Ellen Belmont, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Kathie Heuitt, Stonington, CT – Letter to NAE – Forwarded October 13, 2015
Dean Martin, Groton, CT – Letter to NAE – Forwarded October 13, 2015
Karen Bakowski, Uncasville, CT – Letter to NAE – Forwarded October 13, 2015
Viola Tagliatella, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Richard Flanders, Madison, CT – Letter to NAE – Forwarded October 13, 2015
Meghan Higgins, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
K. O’Farrell, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Debbie Capone, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
John Simmert, Norwich, CT – Letter to NAE – Forwarded October 13, 2015
Donna Michaud, Middletown, CT – Letter to NAE – Forwarded October 13, 2015
John Cortesi, Middletown, CT – Letter to NAE – Forwarded October 13, 2015
Carol Cone, CT – Letter to NAE – Forwarded October 13, 2015
Kevin Kennedy, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Susan Roberts, Lyme, CT – Letter to NAE – Forwarded October 13, 2015
Kristen Roberts, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Ken Barre, Essex, CT – Letter to NAE – Forwarded October 13, 2015
Susan Beckman, Ivoryton, CT – Letter to NAE – Forwarded October 13, 2015
Louise DiCarlo, Guilford, CT – Letter to NAE – Forwarded October 13, 2015
Chesca Conserva-Barre, Essex, CT – Letter to NAE – Forwarded October 13, 2015
Fred B., Old Lyme, CT – Letter to NAE – Forwarded October 13, 2015
Judith Chase, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Edward Marcelini, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
John Bairos, Essex, CT – Letter to NAE – Forwarded October 13, 2015
Keith McVall, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Patrick O’Neil, Old Lyme, CT – Letter to NAE – Forwarded October 13, 2015
David Shinn, Deep River, CT – Letter to NAE – Forwarded October 13, 2015
D.P., Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Illegible, Guilford, CT – Letter to NAE – Forwarded October 13, 2015
Alan Vu, Westbrook, CT – Letter to NAE – Forwarded October 13, 2015
Stephen Dix, Old Lyme, CT – Letter to NAE – Forwarded October 13, 2015
Addison Ricker, Old Lyme, CT – Letter to NAE – Forwarded October 13, 2015
John McArdle, Madison, CT – Letter to NAE – Forwarded October 13, 2015
Sherwood, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
N.A.P., Rocky Hill, CT – Letter to NAE – Forwarded October 13, 2015
Anthony Nazzaro, Essex, CT – Letter to NAE – Forwarded October 13, 2015
Richard Greer, Guilford, CT – Letter to NAE – Forwarded October 13, 2015
William Ferris, Branford, CT – Letter to NAE – Forwarded October 13, 2015
David F., Guilford, CT – Letter to NAE – Forwarded October 13, 2015
S.M. Moran, Longmeadow, MA – Letter to NAE – Forwarded October 13, 2015
Suzanne Cannon, Madison, CT – Letter to NAE – Forwarded October 13, 2015
Gary Gagnon, East Hampton, CT – Letter to NAE – Forwarded October 13, 2015

J.T. Adams, Higganum, CT – Letter to NAE – Forwarded October 13, 2015
 Jonathan Jennings, Killingworth, CT – Letter to NAE – Forwarded October 13, 2015
 Phil Bennett, Groton, CT – Letter to NAE – Forwarded October 13, 2015
 Timothy Scott, Prospect, CT – Letter to NAE – Forwarded October 13, 2015
 Illegible, South Windsor, CT – Letter to NAE – Forwarded October 13, 2015
 S.K., Vernon, CT – Letter to NAE – Forwarded October 13, 2015
 Helnar Wolf, South Windsor, CT – Letter to NAE – Forwarded October 13, 2015
 A.S., West Hartford, CT – Letter to NAE – Forwarded October 13, 2015
 Roger Fielitz, NY – Letter to NAE – Forwarded October 13, 2015
 Wilma Fielitz, NY – Letter to NAE – Forwarded October 13, 2015
 Thelma Goldberg, Lake Grove, NY – Letter to NAE – Forwarded October 13, 2015
 Fern Fier, NY – Letter to NAE – Forwarded October 13, 2015
 Troy Weinrich, NY – Letter to NAE – Forwarded October 13, 2015
 John Vitale and Family, Northport, NY – Letter to NAE – Forwarded October 13, 2015
 S. Pavone, Smithtown, NY – Letter to NAE – Forwarded October 13, 2015
 Lisa Breuer, Nesconset, NY – Letter to NAE – Forwarded October 13, 2015
 Stephen Soule, Stamford, CT – Letter to NAE – October 13, 2015
 Melissa Wolfe, Stamford, CT – Letter to NAE – October 13, 2015
 Marie Grecco, East Williston, NY – Letter to NAE – October 13, 2015
 Joe Luisi, Sr., West Hartford, CT – Letter to NAE – Forwarded October 13, 2015
 Jill Luisi, West Hartford, CT – Letter to NAE – Forwarded October 13, 2015
 Brian H., Deep River, CT – Letter to NAE – Forwarded October 13, 2015
 Frances Cupillo, Springfield, MA – Letter to NAE – Forwarded October 13, 2015
 Gregory A., Meriden, CT – Letter to NAE – Forwarded October 13, 2015
 John Beers, New Haven, CT – Letter to NAE – Forwarded October 13, 2015
 Roger Letendre, Plainville, CT – Letter to NAE – Forwarded October 13, 2015
 Robert Chrisman, Chester, CT – Letter to NAE – Forwarded October 13, 2015
 J. (Illegible), Chester, CT – Letter to NAE – Forwarded October 13, 2015
 D. Hughes, Oakville, CT – Letter to NAE – Forwarded October 13, 2015
 David Hughes, Oakville, CT – Letter to NAE – Forwarded October 13, 2015
 Frank Lawther, Garden City, NY – Letter to NAE – Forwarded October 13, 2015
 Chandana Rodrino, Glen Cove, NY – Letter to NAE – Forwarded October 13, 2015
 William Thompson, East Norwich, NY – Letter to NAE – Forwarded October 13, 2015
 Tiffany Crowley, Glen Cove, NY – Letter to NAE – Forwarded October 13, 2015
 Alan Krull, Wantagh, NY – Letter to NAE – Forwarded October 13, 2015
 Laura Worring, Oyster Bay, NY – Letter to NAE – Forwarded October 13, 2015
 Keith Ritchie, Huntington Station, NY – Letter to NAE – Forwarded October 13, 2015
 R.L., Old Lyme, CT – Letter to NAE – Forwarded October 13, 2015
 Steven Mosley, Chester, CT – Letter to NAE – Forwarded October 13, 2015
 Colin Codene, Middletown, CT – Letter to NAE – Forwarded October 13, 2015
 Wayne McAllister, Middletown, CT – Letter to NAE – Forwarded October 13, 2015
 Abbie McAllister, Middletown, CT – Letter to NAE – Forwarded October 13, 2015
 Peter Stump, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 Brecmin Morgan, Milford, CT – Letter to NAE – Forwarded October 13, 2015
 David Faulkner, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 John L., Moodus, CT – Letter to NAE – Forwarded October 13, 2015
 Illegible, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015

Annamaria Iacoletti, Westbrook, CT – Letter to NAE – Forwarded October 13, 2015
 Pauline Ackles, Old Lyme, CT – Letter to NAE – Forwarded October 13, 2015
 Jack Marroney, Clinton, CT – Letter to NAE – Forwarded October 13, 2015
 Lewis Davidson, Old Lyme, CT – Letter to NAE – Forwarded October 13, 2015
 David Fowler, Ivoryton, CT – Letter to NAE – Forwarded October 13, 2015
 Kara Gamsale, Westbrook, CT – Letter to NAE – Forwarded October 13, 2015
 Bruce Manly, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 E.B., Ivoryton, CT – Letter to NAE – Forwarded October 13, 2015
 Bob Potter, Old Lyme, CT – Letter to NAE – Forwarded October 13, 2015
 Daniel Price, East Lyme, CT – Letter to NAE – Forwarded October 13, 2015
 Edward Armstrong, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 Karyn Schultz, Ivoryton, CT – Letter to NAE – Forwarded October 13, 2015
 Dianne Moser, CT – Letter to NAE – Forwarded October 13, 2015
 R. Stinson, Essex, CT – Letter to NAE – Forwarded October 13, 2015
 Illegible, Branford, CT – Letter to NAE – Forwarded October 13, 2015
 M. Hanson, Branford, CT – Letter to NAE – Forwarded October 13, 2015
 A. R., Higganum, CT – Letter to NAE – Forwarded October 13, 2015
 James Baber, Ivoryton, CT – Letter to NAE – Forwarded October 13, 2015
 Trish Maselli, Ivoryton, CT – Letter to NAE – Forwarded October 13, 2015
 Carina Using, Old Lyme, CT – Letter to NAE – Forwarded October 13, 2015
 Judy Sullivan, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 Charles McSorley, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 Robert Bradley, Clinton, CT – Letter to NAE – Forwarded October 13, 2015
 Christopher Dubord, East Lyme, CT – Letter to NAE – Forwarded October 13, 2015
 Todd Jokl, Jr., Woodbridge, CT – Letter to NAE – Forwarded October 13, 2015
 Anna Pratt, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 Sandra Wirth, East Hampton, CT – Letter to NAE – Forwarded October 13, 2015
 Scott Criscuolo, East Haven, CT – Letter to NAE – Forwarded October 13, 2015
 Lauren Jones, Ivoryton, CT – Letter to NAE – Forwarded October 13, 2015
 Amanda E., North Stonington, CT – Letter to NAE – Forwarded October 13, 2015
 C. Brendan Montano, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
 Susan Decker, Deep River, CT – Letter to NAE – Forwarded October 13, 2015
 Alyx Ricafranca, Niantic, CT – Letter to NAE – Forwarded October 13, 2015
 Carlos Ortiz, Clinton, CT – Letter to NAE – Forwarded October 13, 2015
 Illegible, Groton, CT – Letter to NAE – Forwarded October 13, 2015
 P.T., North Haven, CT – Letter to NAE – Forwarded October 13, 2015
 Angelo Williams, Monroe, CT – Letter to NAE – Forwarded October 13, 2015
 Lisa Silver, Greenwich, CT – Letter to NAE – Forwarded October 13, 2015
 Louis Tagliatela, Jr., Wallingford, CT – Letter to NAE – Forwarded October 13, 2015
 Sharon Egan, Dayville, CT – Letter to NAE – Forwarded October 13, 2015
 Jason Daigle, Monroe, CT – Letter to NAE – Forwarded October 13, 2015
 Joyce Harris, Hamden, CT – Letter to NAE – Forwarded October 13, 2015
 Christine Ruszkowski,, Milford, CT – Letter to NAE – Forwarded October 13, 2015
 Jillian Mordovanes, East Haven, CT – Letter to NAE – Forwarded October 13, 2015
 Charles Craig, Wallingford, CT – Letter to NAE – Forwarded October 13, 2015
 Dione Lopes, Southbury, CT – Letter to NAE – Forwarded October 13, 2015
 Adeline Wright, Southbury, CT – Letter to NAE – Forwarded October 13, 2015

Dennis Caffrey, Wallingford, CT – Letter to NAE – Forwarded October 13, 2015
Patricia Maher, Hamden, CT – Letter to NAE – Forwarded October 13, 2015
Robert Falaguerra, Old Lyme, CT – Letter to NAE – Forwarded October 13, 2015
Judith and Thomas Creolse, New Canaan, CT – Letter to NAE – Forwarded October 13, 2015
Angelo and Judy Volta, Chester, CT – Letter to NAE – Forwarded October 13, 2015
Janet Franco, Chappaqua, NY – Letter to NAE – Forwarded October 13, 2015
Isreal Franco, Chappaqua, NY – Letter to NAE – Forwarded October 13, 2015
Manuel Almagro, West Granby, CT – Letter to NAE – Forwarded October 13, 2015
Nelphison DeAlmeida, Danbury, CT – Letter to NAE – Forwarded October 13, 2015
S. Consolo, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
H. Consolo, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Craig Plourde, Meridan, CT – Letter to NAE – Forwarded October 13, 2015
Diane Plourde, Meridan, CT – Letter to NAE – Forwarded October 13, 2015
Mary Lynn Carney, Wethersfield, CT – Letter to NAE – Forwarded October 13, 2015
Kim Forcier, Meridan, CT – Letter to NAE – Forwarded October 13, 2015
Joseph Costanzo, East Haddam, CT – Letter to NAE – Forwarded October 13, 2015
Walter Kozior, Avon, CT – Letter to NAE – Forwarded October 13, 2015
Mary Dapkins, Prospect, CT – Letter to NAE – Forwarded October 13, 2015
Mark Toce, East Haddam, CT – Letter to NAE – Forwarded October 13, 2015
A. Brendan Montano, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Caola Schonberg, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Ann Martino, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Al Martino, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Erin Moroni, Westbrook, CT – Letter to NAE – Forwarded October 13, 2015
Elizabeth Potts, Killingsworth, CT – Letter to NAE – Forwarded October 13, 2015
Roderick Dapkins, Prospect, CT – Letter to NAE – Forwarded October 13, 2015
Ken Laronette, Branford, CT – Letter to NAE – Forwarded October 13, 2015
Colleen Falaguerra, Old Lyme, CT – Letter to NAE – Forwarded October 13, 2015
Frederick Marinelli, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Chris Robben, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
David Potts, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Tim Quill, Woodbridge, CT – Letter to NAE – Forwarded October 13, 2015
Susan Camera, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Patricia Kaik, Haddam, CT – Letter to NAE – Forwarded October 13, 2015
Earl Maxfield, Jr., Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Robert Lee, Wallingford and Clinton, CT – Letter to NAE – Forwarded October 13, 2015
Daniel May, West Haven, CT – Letter to NAE – Forwarded October 13, 2015
Mario Gaboury, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Kevin Myatt, Branford, CT – Letter to NAE – Forwarded October 13, 2015
Kim Meadows, Chester, CT – Letter to NAE – Forwarded October 13, 2015
Kathryn Windas, New London, CT – Letter to NAE – Forwarded October 13, 2015
Pat Wilson, Westbrook, CT – Letter to NAE – Forwarded October 13, 2015
Camila Cardona, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
David Carswell, Clinton, CT – Letter to NAE – Forwarded October 13, 2015
Mark Appellof, Middletown, CT – Letter to NAE – Forwarded October 13, 2015
Paul C., Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Thomas Warner, Chester, CT – Letter to NAE – Forwarded October 13, 2015

Nash Garrison, New London, CT – Letter to NAE – Forwarded October 13, 2015
Hector Quinones, New London, CT – Letter to NAE – Forwarded October 13, 2015
Danny Quinones, New London, CT – Letter to NAE – Forwarded October 13, 2015
Eleonora Ciorcia, Clinton, CT – Letter to NAE – Forwarded October 13, 2015
Kim Short, Lyme, CT – Letter to NAE – Forwarded October 13, 2015
Illegible, Branford, CT – Letter to NAE – Forwarded October 13, 2015
Illegible, Hamden, CT – Letter to NAE – Forwarded October 13, 2015
J. (Illegible), Branford, CT – Letter to NAE – Forwarded October 13, 2015
Paul M., Orange, CT – Letter to NAE – Forwarded October 13, 2015
Orlando Bardero, New Haven CT – Letter to NAE – Forwarded October 13, 2015
Dave Watts, Woodbridge, CT – Letter to NAE – Forwarded October 13, 2015
Jeffrey Uhlan, Wallingford, CT – Letter to NAE – Forwarded October 13, 2015
Joe Curtiss, Hamden, CT – Letter to NAE – Forwarded October 13, 2015
Joanne Machillo, Guilford, CT – Letter to NAE – Forwarded October 13, 2015
Michael Florezar, Hamden, CT – Letter to NAE – Forwarded October 13, 2015
Joseph Bonito, New Haven, CT – Letter to NAE – Forwarded October 13, 2015
Gerard O’Conner, New Haven, CT – Letter to NAE – Forwarded October 13, 2015
John Delizio, Woodbridge, CT – Letter to NAE – Forwarded October 13, 2015
Michael Semoro, East Haven, CT – Letter to NAE – Forwarded October 13, 2015
David P., Hamden, CT – Letter to NAE – Forwarded October 13, 2015
Cesar DeLeon, CT – Letter to NAE – Forwarded October 13, 2015
Luisito Fille, Hamden, CT – Letter to NAE – Forwarded October 13, 2015
Willie Barber, Hamden, CT – Letter to NAE – Forwarded October 13, 2015
Fabian Merturi, Oxford, CT – Letter to NAE – Forwarded October 13, 2015
Robert Southwel, New Haven, CT – Letter to NAE – Forwarded October 13, 2015
Teresa Watts, Woodbridge, CT – Letter to NAE – Forwarded October 13, 2015
Charles Ruotolo Sr., Hamden, CT – Letter to NAE – Forwarded October 13, 2015
Laurie Moniello, East Haven, CT – Letter to NAE – Forwarded October 13, 2015
Whitney Towers, Hamden, CT – Letter to NAE – Forwarded October 13, 2015
Michele Bogarcley, Ansonia, CT – Letter to NAE – Forwarded October 13, 2015
Illegible, West Haven, CT – Letter to NAE – Forwarded October 13, 2015
Illegible, Hamden, CT – Letter to NAE – Forwarded October 13, 2015
V. DeLuca, Hamden, CT – Letter to NAE – Forwarded October 13, 2015
Illegible, Hamden, CT – Letter to NAE – Forwarded October 13, 2015
David Brewse, Guilford, CT – Letter to NAE – Forwarded October 13, 2015
Gerard Weatherby, Windsor Locks, CT – Letter to NAE – Forwarded October 13, 2015
Julia Weatherby, Windsor Locks, CT – Letter to NAE – Forwarded October 13, 2015
Lynn Carney, Wallingford, CT – Letter to NAE – Forwarded October 13, 2015
Cooper Kean, Guilford, CT – Letter to NAE – Forwarded October 13, 2015
Clair Helenek, Haddam, CT – Letter to NAE – Forwarded October 13, 2015
Steven Cousalo, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Laurie Auger, Clinton, CT – Letter to NAE – Forwarded October 13, 2015
Amanda Auger, Clinton, CT – Letter to NAE – Forwarded October 13, 2015
Monet Morrison, New Haven, CT – Letter to NAE – Forwarded October 13, 2015
Michele Gometz, East Haddam, CT – Letter to NAE – Forwarded October 13, 2015
Alejandro Marrinon, Clinton, CT – Letter to NAE – Forwarded October 13, 2015
Jared Crouch, Glastonbury, CT – Letter to NAE – Forwarded October 13, 2015

Andrew Pascal, Groton, CT – Letter to NAE – Forwarded October 13, 2015
Murray Beach, Westwood, MA – Letter to NAE – Forwarded October 13, 2015
R.S., CT – Letter to NAE – Forwarded October 13, 2015
Janet Almagro, North Granby, CT – Letter to NAE – Forwarded October 13, 2015
Christopher Britt, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Bradford Boulay, Killingworth, CT – Letter to NAE – Forwarded October 13, 2015
Shaun M., CT – Letter to NAE – Forwarded October 13, 2015
Peter Whist, Clinton, CT – Letter to NAE – Forwarded October 13, 2015
Capt. Paul Retano, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Joseph (Illegible), Middletown, CT – Letter to NAE – Forwarded October 13, 2015
Mila Corcoran Captain, Clinton, CT – Letter to NAE – Forwarded October 13, 2015
Brett Walter, West Haven, CT – Letter to NAE – Forwarded October 13, 2015
Diann Moresti, Meridan, CT – Letter to NAE – Forwarded October 13, 2015
Warren Kennedy, Branford, CT – Letter to NAE – Forwarded October 13, 2015
L.D., CT – Letter to NAE – Forwarded October 13, 2015
Greg Braun, Branford, CT – Letter to NAE – Forwarded October 13, 2015
Tim Topping, Branford, CT – Letter to NAE – Forwarded October 13, 2015
Peter Marshall, Old Lyme, CT – Letter to NAE – Forwarded October 13, 2015
Wayne Goldsmith, Killingworth, CT – Letter to NAE – Forwarded October 13, 2015
Dave Adams, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Michael Chapin, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Nicholas D’Aciri, Meridan, CT – Letter to NAE – Forwarded October 13, 2015
Alfred Reeser, Essex, CT – Letter to NAE – Forwarded October 13, 2015
Chris Rueckert, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Zaida McKenzie, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Megan Hakert, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Leeanne Morgan, Lebanon, CT – Letter to NAE – Forwarded October 13, 2015
Sean Morgan, Lebanon, CT – Letter to NAE – Forwarded October 13, 2015
Zack Perry, Groton, CT – Letter to NAE – Forwarded October 13, 2015
Rory DelGiudice, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Viktoreja Ruginyte, Mystic, CT – Letter to NAE – Forwarded October 13, 2015
Kenny Wilson, Groton, CT – Letter to NAE – Forwarded October 13, 2015
Hideraldo Cirino, Mystic, CT – Letter to NAE – Forwarded October 13, 2015
Rubson Guimaraes, Waterford, CT – Letter to NAE – Forwarded October 13, 2015
Nelson Chalas, New London, CT – Letter to NAE – Forwarded October 13, 2015
Joseph Masilli, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
James Bianchi, Clinton, CT – Letter to NAE – Forwarded October 13, 2015
Maria Bell, Old Saybrook, CT – Letter to NAE – Forwarded October 13, 2015
Jennifer Braidon, Ivoryton, CT – Letter to NAE – Forwarded October 13, 2015
Gary Thomas, Shelton CT – Letter to NAE – FW by CCE October 13, 2015
Michael Thomas, Shelton, CT – Letter to NAE – FW by CCE October 13, 2015
Tracey Carroll, Shelton CT – Letter to NAE – FW by CCE October 13, 2015
Vin Anastasio – Letter to NAE – FW by CCE October 13, 2015
Zachary Turner, Shelton CT – Letter to NAE – FW by CCE October 13, 2015
John Lenoci – Letter to NAE – FW by CCE October 13, 2015
Soccio Family, Wilton CT – Letter to NAE – FW by CCE October 13, 2015
Maddie Soccio, Wilton CT – Letter to NAE – FW by CCE October 13, 2015

Eliana Soccio, Wilton CT – Letter to NAE – FW by CCE October 13, 2015
 Melissa Soccio, Wilton CT – Letter to NAE – FW by CCE October 13, 2015
 Appel, CT – Letter to NAE – FW by CCE October 13, 2015
 Marina and Valery Schmidt, Stamford CT – Letter to NAE – Forwarded October 13, 2015
 Monika Szymanowicz, Stamford CT – Letter to NAE – FW by CCE October 13, 2015
 John Girardi, New Haven CT – Letter to NAE – FW by CCE October 13, 2015
 Camille Laudano, New Haven CT – Letter to NAE – FW by CCE October 13, 2015
 Michelle Laudano, New Haven CT – Letter to NAE – FW by CCE October 13, 2015
 Fran Belviso, New Haven CT – Letter to NAE – FW by CCE October 13, 2015
 Jim Alling, Wallingford CT – Letter to NAE – FW by CCE October 13, 2015
 Courtney Tolokan, Wallingford CT – Letter to NAE – FW by CCE October 13, 2015
 Jennifer Quinones, Cromwell CT – Letter to NAE – FW by CCE October 13, 2015
 Michael Quinones, Cromwell CT – Letter to NAE – FW by CCE October 13, 2015
 Tong Nguyen, Cromwell CT – Letter to NAE – FW by CCE October 13, 2015
 Donna Salvatore, Cromwell CT – Letter to NAE – FW by CCE October 13, 2015
 F.M. Sadick, Shelton CT – Letter to NAE – FW by CCE October 13, 2015
 B.M., Cromwell, CT – Letter to NAE – Forwarded October 13, 2015
 Linda Tucker, Shelton CT – Letter to NAE – FW by CCE October 13, 2015
 Loren Manginelli – Letter to NAE – FW by CCE October 13, 2015
 Edward Gannon, Wallingford CT – Letter to NAE – FW by CCE October 13, 2015
 Annette Kababek, New Haven, CT – Letter to NAE – Forwarded October 13, 2015
 Barbara Crew, Wallingford CT – Letter to NAE – FW by CCE October 13, 2015
 Peter Whitman – Letter to NAE – FW by CCE October 13, 2015
 Dave M. – Cromwell CT – Letter to NAE – FW by CCE October 13, 2015
 Gena Barreiro, CT – Letter to NAE – Forwarded October 13, 2015
 Taylor Piper, New Haven CT – Letter to NAE – FW by CCE October 13, 2015
 Karen Wellman, New Haven CT – Letter to NAE – FW by CCE October 13, 2015
 Sheldon and Nancy Severs, Woodstock, CT – Email to NAE – October 13, 2015
 Richard Farr, Madison, CT – Letter to NAE – October 13, 2015
 Nancy White, CT – Email to NAE – October 13, 2015
 John Zorick, CT – Email to NAE – October 13, 2015
 David Air, Orient, NY – Email to NAE – October 13, 2015
 Dennis Dorherty, Mystic, CT – Email to NAE – October 13, 2015
 Capt. Robert Anderson, CT – Email to NAE – October 13, 2015
 Barbara Friedman – Email to NAE – October 13, 2015
 Arthur Miller, Mystic, CT – Email to NAE – October 13, 2015
 Harry Bird, Essex, CT – Letter to NAE – October 12, 2015
 John Haskell, Jr., West Mystic, CT – Email to NAE – October 12, 2015
 Paul Generous, Mansfield Center, CT – Email to NAE – October 12, 2015
 Lesley Freeman and Steven Adil, Columbia, CT – Email to NAE – October 12, 2015
 Lillian Ball, Southold, NY – Email to NAE – October 12, 2015
 J.D. McHenry, Groton, CT – Email to NAE – October 12, 2015
 John Calogero, West Hartford, CT – Email to NAE – October 12, 2015
 Harry Holt, Stonington, CT – Email to NAE – October 12, 2015
 David Malchman, Mystic, CT – Email to NAE – October 12, 2015
 David Bourque, CT – Email to NAE – October 12, 2015
 Charles Estabrooks, Deputy Harbormaster, Stonington, CT – Email to NAE – Oct 12, 2015

Charles Bruckerhoff, Chaplin, CT – Email to NAE – October 12, 2015
 Bill Clark, Mystic, CT – Email to NAE – October 12, 2015
 Yankee Sailing, LLC (W. Gordon VanNes), Chester, CT – Letter to NAE – October 12, 2015
 John Cox, New Haven, CT – Letter to NAE – October 12, 2015
 Craig Appel, Glastonbury, CT – 2 Identical Letters to NAE – October 12, 2015
 Antonio Pires, Williston Park, NY – Letter to NAE – October 12, 2015
 David Smith, Groton, CT – Letter to NAE – October 12, 2015
 Michael Stein, Waterford, CT – Letter to NAE – October 12, 2015
 Diane Bergman, Groton, CT – Letter to NAE – October 12, 2015
 Ed Bergman, Jr., Groton, CT – Letter to NAE – October 12, 2015
 Madaline Phezan, Williston Park, NY – Letter to NAE – October 12, 2015
 Jay McKasty, Orient, NY – Letter to NAE – October 12, 2015
 John McKasty, Orient, NY – Letter to NAE – October 12, 2015
 Nicole and Mert Gollaher, Guilford, CT – Letter to NAE – October 12, 2015
 Group for the East End, Southold, NY – Letter to NAE – October 12, 2015
 Denise S., Williston Park, NY – Letter to NAE – October 12, 2015
 Marie Callahan, NY – Letter to NAE – October 12, 2015
 Cindy Velez, Williston Park, NY – Letter to NAE – October 12, 2015
 Diane Jellesna, Williston Park, NY – Letter to NAE – October 12, 2015
 David Grimaldi, Cromwell, CT – Letter to NAE – October 12, 2015
 Jacqueline Walsh, Cromwell, CT – Letter to NAE – October 12, 2015
 Julie Testa, Cromwell, CT – Letter to NAE – October 12, 2015
 Joseph Cannata, Cromwell, CT – Letter to NAE – October 12, 2015
 Jennifer and Edward Bonczek, Cromwell, CT – Letter to NAE – October 12, 2015
 Scott Baecker, Cromwell, CT – Letter to NAE – October 12, 2015
 Phyllis Baecker, Cromwell, CT – Letter to NAE – October 12, 2015
 Michael Baecker, Cromwell, CT – Letter to NAE – October 12, 2015
 Amy Finn, Cromwell, CT – Letter to NAE – October 11, 2015
 C. Kehoe, Manhasset, NY – Letter to NAE – October 11, 2015
 Beatrice Heney, Mineola, NY – Letter to NAE – October 11, 2015
 Daniel Miller, NY – Letter to NAE – October 11, 2015
 Barbara Curtiss, Miller Place, NY – Letter to NAE – October 11, 2015
 Joseph Curtiss, Miller Place, NY – Letter to NAE – October 11, 2015
 John Luttatie, Miller Place, NY – Letter to NAE – October 11, 2015
 Marina Szmala, Miller Place, NY – Letter to NAE – October 11, 2015
 Linda, Sabatino, NY – Email to NAE – October 10, 2015
 Carl Gehring, West Mystic, CT – Letter to NAE – October 10, 2015
 Stacey Scholem, Commack, NY – Letter to NAE – October 10, 2015
 Keith M., NY – Letter to NAE – October 10, 2015
 Susan Ferrara, Farmingdale, NY – Letter to NAE – October 10, 2015
 Matthew DiCarlo, Farmingdale, NY – Letter to NAE – October 10, 2015
 Thomas DiCarlo, Farmingdale, NY – Letter to NAE – October 10, 2015
 T.J. DiCarlo, Farmingdale, NY – Letter to NAE – October 10, 2015
 Jo-ann DiCarlo, Farmingdale, NY – Letter to NAE – October 10, 2015
 Wendy Brofman, Northport, NY – Letter to NAE – October 10, 2015
 Town of East Lyme, CT, Harbor Mngmt/Shellfish Comm’n – Letter to NAE – Oct 10, 2015
 Frederic Fischer, Noank, CT – Letter to NAE – October 10, 2015

Anthony & Barbara Lovallo, Cos Cob, CT – Letter to NAE – October 10, 2015
 Dennis and Linda Angarano, Harrison, NY – Letter to NAE – October 10, 2015
 Holly and B. Weingart, East Marion, NY – Letter to NAE – October 10, 2015
 Jennifer Pugh, New Haven, CT – Letter to NAE – October 10, 2015
 Christine Perry, CT – Letter to NAE – October 10, 2015
 Steven Jacowitz, New York, NY – Letter to NAE – October 10, 2015
 Robert Price, Waterford, CT – Letter to NAE – October 10, 2015
 Diane Popowysch, NY – Letter to NAE – Forwarded October 10, 2015
 J.M., Mineola, NY – Letter to NAE – Forwarded October 10, 2015
 The Barton Family, NY – Letter to NAE – Forwarded October 10, 2015
 Paul Reader, Westport, CT – Letter to NAE – October 10, 2015
 Jennie Setaro, Wallingford, CT – Letter to NAE – October 9, 2015
 Linda McCarthy, Wallingford, CT – Letter to NAE – October 9 2015
 Kenneth Burt, CT – Letter to NAE – October 9 2015
 F. R., Westport, CT – Letter to NAE – October 9 2015
 U.S. Naval Submarine Base New London, CT – Letter to NAE – October 9, 2015
 James Beard, Milford, CT – Letter to NAE – October 9, 2015
 NY Departments of State & Environmental Conservation – Joint Letter to NAE – Oct 9, 2015
 John Robinson, Tolland, CT – Letter to NAE – October 9, 2015
 Dorothy Trout, Massapequa, NY – Letter to NAE – October 9, 2015
 Ethel Quillin, Greenport, NY – Letter to NAE – October 9, 2015
 Henrietta Saccomano, Sound Beach, NY – Letter to NAE – October 9, 2015
 Jeffrey Weingart, Greenport, NT – Letter to NAE – October 9, 2015
 Miriam Foster, Orient, NY – Letter to NAE – October 9, 2015
 Guy Tennyson, Wallingford, CT – Letter to NAE – October 9, 2015
 Angela (Unknown), CT – Letter Forwarded by CCE to NAE – October 9, 2015
 Linda & Robert Napoli, Mineola NY – Letter to NAE – October 9 2015
 Gloria-Jean Berberich, Mineola NY – Letter to NAE – October 9 2015
 Roy Berberich, Mineola NY – Letter to NAE – October 9 2015
 Stella Staszyn, Mineola NY – Letter to NAE – October 9 2015
 Rajammer T., Mineola NY – Letter to NAE – October 9 2015
 Patrick Coyne, Mineola NY – Letter to NAE – October 9 2015
 Donna Strein, Mineola NY – Letter to NAE – October 9 2015
 Frank Messana, Mineola, NY – Letter to NAE – October 9 2015
 Rudy Hroziencik, Greenwich, CT – Letter to NAE – October 8, 2015
 Theresa Houde, New Haven, CT – Letter to NAE – October 8, 2015
 Susan Marchese, Wallingford, CT – Letter to NAE – October 8, 2015
 Nassau County Legislator Delia DeRiggi-Whitton, NY – Letter to NAE – October 8, 2015
 Hempstead Harbor Protection Committee, NY – Letter to NAE – October 8, 2015
 Andrew Wagner, Westport, CT – Letter to NAE – October 8, 2015
 Dale Bidwell, Glastonbury, CT – Letter to NAE – October 8, 2015
 Tim Bidwell, Glastonbury, CT – Letter to NAE – October 8, 2015
 Joseph Montana, Essex, CT – Letter to NAE – October 8, 2015
 Stanley White, Noank, CT – Letter to NAE – October 8, 2015
 Thomas Halsey, Noank, CT – Letter to NAE – October 8, 2015
 Town of Greenwich, Police Dept (James Heavy, Chief) – Letter to NAE – October 8, 2015
 Anne Hopkins, Orient, NY – Letter to NAE – October 8, 2015

Leslie Hegeman, Greenport, NY – Letter to NAE – October 8, 2015
 Magnus Lejdstrom, Southport Yacht Sales, CT – Letter to NAE – Signed October 8, 2015
 Brett Shane, Southport Yacht Sales, CT – Letter to NAE – Signed October 8, 2015
 Thomas McLaughlin, Lake Grove, NY – Letter to NAE – October 8, 2015
 Bruce Franklin, NY – Letter to NAE – Forwarded October 8, 2015
 Angela Asmussen, NY – Letter to NAE – Forwarded October 8, 2015
 Gena Dosso, Commack, NY – Letter to NAE – Forwarded October 8, 2015
 Hannah Sherley, NY – Letter to NAE – Forwarded October 8, 2015
 Herbert Johnson, Nesconset, NY – Letter to NAE – Forwarded October 8, 2015
 Theresa Chiancone, NY – Letter to NAE – Forwarded October 8, 2015
 Antonio Papa, East Williston, NY – Letter to NAE – October 8, 2015
 Vittoria Papa, East Williston, NY – Letter to NAE – October 8, 2015
 Thomas Papa, East Williston, NY – Letter to NAE – October 8, 2015
 Cristina Migliaccio, East Williston, NY – Letter to NAE – October 8, 2015
 Gina Sampogna, NY – Letter to NAE – October 8, 2015
 Meryl Fordin, Mineola, NY – Letter to NAE – October 8, 2015
 Andrew Kraus, NY – Letter to NAE – October 8, 2015
 Maribeth Kraus – Letter to NAE – October 8, 2015
 George Poarch, East Williston, NY – Letter to NAE – October 8, 2015
 Joyce Tenney, NY – Letter to NAE – October 8, 2015
 David Zakur, New Haven, CT – Letter to NAE – October 8, 2015
 Dana Ashby, New Haven, CT – Letter to NAE – October 8, 2015
 Robyn Redinger, New Haven, CT – Letter to NAE – October 8, 2015
 Michael Paulaitis, New Haven, CT – Letter to NAE – October 8, 2015
 Katherine Blossom, New Haven, CT – Letter to NAE – October 8, 2015
 William O., CT – Letter to NAE – October 8 2015
 Sara O., CT – Letter to NAE – October 8, 2015
 S.O., CT – Letter to NAE – October 8, 2015
 Salvatore Punzo, New Haven, CT – Letter to NAE – October 8, 2015
 Jennifer Punzo, New Haven, CT – Letter to NAE – October 8, 2015
 Tucker Punzo, New Haven, CT – Letter to NAE – October 8, 2015
 Tristan Punzo, New Haven, CT – Letter to NAE – October 8, 2015
 Tanner Punzo, New Haven, CT – Letter to NAE – October 8, 2015
 Tatum Punzo, New Haven, CT – Letter to NAE – October 8, 2015
 Susan Wehner, New Haven, CT – Letter to NAE – October 8, 2015
 Vanessa Fasanella, New Haven, CT – Letter to NAE – October 8, 2015
 Chris Fasanella, New Haven, CT – Letter to NAE – October 8, 2015
 Leonard Lovello, Wallingford, CT – Letter to NAE – October 7, 2015
 Donna Ryder, CT – Letter to NAE – October 7, 2015
 Arleen Weber, Stamford, CT – Letter to NAE – October 7, 2015
 Thomas Thompson, Stamford, CT – Letter to NAE – October 7, 2015
 Patricia Thompson, Stamford, CT – Letter to NAE – October 7, 2015
 Cannon Garber, Stamford, CT – Letter to NAE – October 7, 2015
 Karen/Robert Tonne, Stamford, CT – Letter to NAE – October 7 2015
 Roseanne Hurvitz, Stamford, CT – Letter to NAE – October 7, 2015
 Shirley Kish, Commack, NY – Letter to NAE – October 7, 2015
 New England District – News Release on DMMP Concerns – October 7, 2015

Deborah & Gary Berner, Cos Cob, CT – Letter to NAE – October 7, 2015
 Harold Fletcher, Cos Cob, CT – Letter to NAE – October 7, 2015
 Town of Guilford, CT, Marina Commission (Roger Celesk) – Email to NAE – Oct 7, 2015
 Ashley Asti, Smithtown, NY – Letter to NAE – October 7, 2015
 Clare Air, NY – Email to NAE – October 7, 2015
 John Dispenza, Orient, NY – Letter to NAE – October 7, 2015
 Robert and Ann VanCleaf, Greenport, NY – Letter to NAE – October 7, 2015
 Scott Stevenson, Commack, NY – Letter to NAE – October 7, 2015
 Barbara DeSonne, NY – Letter to NAE – October 7, 2015
 G.H., NY – Letter to NAE – October 7, 2015
 Walter Strohmeyer, Orient, NY – Letter to NAE – October 7, 2015
 Elizabeth Rowe, Orient, NY – Letter to NAE – October 7, 2015
 Suffolk County Planning Commission, NY – Letter to NAE – October 7, 2015
 Robert Isola, Armonk, NY – Letter to NAE – October 6, 2015
 Michael Speeg, Wallingford, CT – Letter to NAE – October 6, 2015
 Douglas & Monique Schweitzer, Nesconset, NY – Letter to NAE – October 6, 2015
 Louise and William Fagan, Orient Point, NY – Letter to NAE – PM October 6, 2015
 Sharon Bogden, Orient, NY – Letter to NAE – October 6, 2015
 Hannah Robinson, Joanne Forman & Patricia Patten, Sound Beach Property Owners
 Association, Orient, NY – Letter to NAE – Oct 6, 2015
 Christina Walsh, NY – Letter to NAE – October 6, 2015
 Christina Consentino, Nesconset, NY – Letter to NAE – October 6, 2015
 Emily Pernal, Nesconset, NY – Letter to NAE – October 6, 2015
 David Graff, Commack, NY – Letter to NAE – October 6, 2015
 Michael Graff, Commack, NY – Letter to NAE – October 6, 2015
 Robert Cameron, Greenwich, CT – Letter to NAE – October 6, 2015
 Lillian Fong, Greenwich, CT – Email to NAE – October 6, 2015
 Betty Satterwhite, Orient, NY – Email to NAE – October 6, 2015
 Jesse Gordon, New York, NY – Email to NAE – October 6, 2015
 Marjorie Nugent, Greenport, NY – Letter to NAE – October 6, 2015
 Venetia Hands, Orient, NY – Email to NAE – October 6, 2015
 Greg Arnold, Nesconset, NY – Letter to NAE – October 6, 2015
 Lidia Botero, Stamford, CT – Letter to NAE – October 6, 2015
 Rosa Franzese, Shelton, CT – Letter to NAE – October 6, 2015
 Frank Vozzo, CT – Letter to NAE – October 6, 2015
 The Cappiello Family, Shelton, CT – Letter to NAE – October 6, 2015
 Isaac Seyer, Shelton, CT – Letter to NAE – October 6, 2015
 Lydia Seyer, Shelton, CT – Letter to NAE – October 6, 2015
 Steve Seyer, Shelton, CT – Letter to NAE – October 6, 2015
 Jane Seyer, Shelton, CT – Letter to NAE – October 6, 2015
 Bill Dolbier, Shelton, CT – Letter to NAE – October 6, 2015
 Kelly Farmer, Shelton, CT – Letter to NAE – October 6, 2015
 The Buzzelli Family, Shelton, CT – Letter to NAE – October 6, 2015
 Gavin Martin, Shelton, CT – Letter to NAE – October 6, 2015
 Kelly Martin, Shelton, CT – Letter to NAE – October 6, 2015
 Lynn Martin, Shelton, CT – Letter to NAE – October 6, 2015
 Robert Martin, Shelton, CT – Letter to NAE – October 6, 2015

Barbara Miller, Pittsford, NY – Email to NAE – Forwarded by CCE October 6, 2015
 Marie Donahue, Wallingford, CT – Letter to NAE – October 5, 2015
 Docko, Inc., Mystic, CT – Letter to NAE – October 5, 2015
 John Evans, Guilford, CT – Letter to NAE – October 5, 2015
 Barbara D., Massapequa, NY – Letter Forwarded by CCE to NAE – October 5, 2015
 Stephanie Foote, NY – Letter to NAE – October 5, 2015
 A Primera, Massapequa, NY – Letter to NAE – October 5, 2015
 P.J. Primera, Massapequa, NY – Letter to NAE – October 5, 2015
 D. Primera, Massapequa, NY – Letter to NAE – October 5, 2015
 Joan Coyne, North Massapequa, NY – Letter to NAE – October 5, 2015
 Lauren Grace, NY – Letter to NAE – October 5, 2015
 Jean Wardle & Ray Mortenson, New York and Orient, NY – Letter to NAE – October 5, 2015
 Richard Way, Orange, CT – Email to NAE – October 5, 2015 (Morris Cove)
 Town of Southold, NY – 2 Letters to NAE – October 5, 2015
 Joanne Forman, NY – Email to NAE – October 5, 2015
 Josephine Dolyak, CT – Letter to NAE – Forwarded October 5, 2015
 Nancy Valente, Wilton, CT – Letter to NAE – Forwarded October 5, 2015
 Loriana Melnyk, Shelton, CT – Letter to NAE – Forwarded October 5, 2015
 C. Piteo, New Haven, CT – Letter to NAE – Forwarded October 5, 2015
 Thomas Hummel, New Haven, CT – Letter to NAE – Forwarded October 5, 2015
 John Reynolds, CT – Letter to NAE – Forwarded October 5, 2015
 C. Boland, Shelton, CT – Letter to NAE – Forwarded October 5, 2015
 John G., CT – Letter to NAE – Forwarded October 5, 2015
 Carol R., CT – Letter to NAE – Forwarded October 5, 2015
 L.Z., Shelton, CT – Letter to NAE – Forwarded October 5, 2015
 Eileen Tchakrides, CT – Letter to NAE – Forwarded October 5, 2015
 Rosemary Fattibene, Shelton, CT – Letter to NAE – Forwarded October 5, 2015
 Michael Fattibene, Shelton, CT – Letter to NAE – Forwarded October 5, 2015
 Hailey McTague, CT, CT – Letter to NAE – Forwarded October 5, 2015
 Ana and Julio Rivera, New Haven, CT – Letter to NAE – Forwarded October 5, 2015
 Ruth Czarneski, Shelton, CT – Letter to NAE with Drawings – Forwarded October 5, 2015
 Paul Tomassetti, Shelton, CT – Letter to NAE – Forwarded October 5, 2015
 Lindsay Gay, Shelton, CT – Letter to NAE – Forwarded October 5, 2015
 Concerned Citizen, CT, CT – Letter to NAE – Forwarded October 5, 2015
 Michael Patrick, Shelton, CT – Letter to NAE – Forwarded October 5, 2015
 Don Parker, Shelton, CT – Letter to NAE – Forwarded October 5, 2015
 Edward Finelli, Shelton, CT – Letter to NAE – Forwarded October 5, 2015
 Illegible, CT – Letter to NAE – Forwarded October 5, 2015
 Carol Dauber, Shleton, CT – Letter to NAE – Forwarded October 5, 2015
 Annabell Malumphy, Shleton, CT – Letter to NAE – Forwarded October 5, 2015
 Joe & Nancy Kmetz, Shelton, CT – Letter to NAE – Forwarded October 5, 2015
 The Baldwin Family, Wilton, CT – Letter to NAE – Forwarded October 5, 2015
 Catherine Levin, Wilton, CT – Letter to NAE – Forwarded October 5, 2015
 Alan Levin, Wilton, CT – Letter to NAE – Forwarded October 5, 2015
 Peter Angelini, New Haven, CT – Letter to NAE – Forwarded October 5, 2015
 Chris Scmentilli, New Haven, CT – Letter to NAE – Forwarded October 5, 2015
 Anthony Rispoli, New Haven, CT – Letter to NAE – Forwarded October 5, 2015

H.D., Shelton, CT – Letter to NAE – Forwarded October 5, 2015
 Areta Heran, CT – Letter to NAE – Forwarded October 5, 2015
 Matthew Cacopardo, New Haven, CT – Letter to NAE – Forwarded October 5, 2015
 Julian Kidd, New Haven, CT – Letter to NAE – Forwarded October 5, 2015
 Allison Slaughter, Wilton, CT – Letter to NAE – October 4, 2015
 Neil Michelsen, Cos Cob, NY – Email to NAE – October 4, 2015
 David Moore, Orient, NY – Email to NAE – October 4, 2015
 Diane Puccio, Northport, NY – Letter to NAE – October 4, 2015
 Patricia Palumbo, Northport, NY – Letter to NAE – October 4, 2015
 Lisa de Guzman, Lloyd Harbor, NY – Email to NAE – FW by CCE October 4, 2015
 Peter Bonaventure, Sr., – Email to HQUSACE – October 4, 2015
 Margaret and Arthur Abbott, Farmington, CT – Letter to NAE – October 4, 2015
 Donna Kasinak, New Haven, CT – Letter to NAE – October 4, 2015
 Michael Simoncic, Mattatuck, NY – Email to NAE – Forwarded by CCE October 4, 2015
 Linda DeMotta, St James, NY – Email to NAE – Forwarded by CCE October 4, 2015
 Carolyn & Jim McLaughlin, Orient, NY – Email to NAE – October 3, 2015
 Valerie Kilbridge, Mattituck, NY – Email to NAE – October 3, 2015
 John Martello, Riverside, CT – Letter to NAE – October 3, 2015
 John Socci, Wilton, CT – Letter to NAE – October 3, 2015
 Michael Lathrop, Hamden, CT – Letter to NAE – October 3, 2015
 Mike Wood, Shelton, CT – Letter to NAE – October 3, 2015
 Betty & George Capon, Greenport, NY – Letter to NAE – October 3, 2015
 Jane Smith, Orient, NY – Letter to NAE – October 3, 2015
 Mdemusis1955 – Email to NAE – October 3, 2015
 “A Native Long Islander” – Letter FW by CCE to NAE – October 3, 2015
 Richard Kobel, Wantagh, NY – Email to NAE – FW by CCE October 3, 2015
 Derrick Tingley, Minoa, NY – Email to NAE – FW by CCE October 3, 2015
 Mark Homburg, West Haven, CT – Letter to NAE – October 2, 2015
 Suzanne Young, Massapequa, NY – Letter to NAE – October 2, 2015
 George Dey, Greenwich, CT – Email to NAE – October 2, 2015
 Paul Pranzo, Glastonbury, CT – Letter to NAE – October 2, 2015
 Boats Incorporated (Don MacKenzie), Niantic, CT – Letter to NAE – October 2, 2015
 Sailer Environmental, Inc. (Edward Sailer), Madison, CT – Letter to NAE – October 2, 2015
 Town of Smithtown, NY – Letter to NAE – October 2, 2015
 Cheryl Graef, Wilton, CT – Letter to NAE – October 2, 2015
 Joe and Nancy Kmetz, Shelton, CT – Letter to NAE – October 2, 2015
 James Rios, Shelton, CT – Letter to NAE – October 2, 2015
 John R. Meek, Wilton, CT – Letter to NAE – October 2, 2015
 John Tommessilli, New Haven, CT – Letter to NAE – October 2, 2015
 Mike Gillespie, Orient, CY – Letter to NAE – October 2, 2015
 Ben Briggs, Wilton, CT – Letter to NAE – October 2, 2015
 Tania Smith, Wilton, CT – Letter to NAE – October 2, 2015
 Kim Burke, NY – Letter to NAE – October 2, 2015
 Paula Greco, North Massapequa, NY – Letter to NAE – October 2, 2015
 Fred Greco, North Massapequa, NY – Letter to NAE – October 2, 2015
 Francesca Argueta-Zamora, NY – Letter to NAE with Drawing – Forwarded October 2, 2015
 Tania Smith, Wilton, CT – Letter to NAE – October 2, 2015

Connecticut General Assembly – Joint Letter (39) to General Bostick – October 1, 2015
 Sherri Pranzo, Glastonbury, CT – Letter to NAE – October 1, 2015
 Michael Spiotto, CT – Email to NAE – October 1, 2015
 Sarah & Steven Klocinski, Greenwich, CT – Email to NAE – October 1, 2015
 Mattituck-Laurel Civic Association, Mattituck, NY – Letter to NAE – Oct 1, 2015
 Robert Todd, Shelton, CT – Letter to NAE – October 1, 2015
 Greenwich Harbor Mgmt Comm’n (Bernard Armstrong), CT – Letter to NAE – Oct 1, 2015
 Barbara Golden, New Haven, CT – Letter to NAE – October 1, 2015
 Cheryl & Deborah Robin-Amendola, New Haven, CT – Letter to NAE – October 1, 2015
 James Meek, New Haven, CT – Letter to NAE – October 1, 2015
 Patricia Dennis, Cos Cob, CT – Letter to NAE – October 1, 2015
 Patricia Halstead & John Cerritelli, New Haven, CT – Letter to NAE – October 1, 2015
 William and Lizabeth Haas, Groton Long Point, CT – Letter to NAE – October 1, 2015
 Andrew Levine, CT – Letter to NAE – October 1, 2015
 Sandra Levine, CT – Letter to NAE – October 1, 2015
 Susan Vessicchio, New Haven, CT – Letter to NAE – October 1, 2015
 Anthony Vessicchio, New Haven, CT – Letter to NAE – October 1, 2015
 Neil and Colleen Olinski, New Haven, CT – Letter to NAE – October 1, 2015
 Melissa Talheim, CT – Letter to NAE – October 1, 2015
 Frank Nusdeu, New Haven, CT – Letter to NAE – October 1, 2015
 Louis Moretti, New Haven, CT – Letter to NAE – October 1, 2015
 Richard Hibbard, New Haven, CT – Letter to NAE – October 1, 2015
 Anna Smith, New Haven, CT – Letter to NAE – October 1, 2015
 Ann Marie Apiella, New Haven, CT – Letter to NAE – October 1, 2015
 Marcia Leducio, New Haven, CT – Letter to NAE – October 1, 2015
 Margo Ottenbreit, New Haven, CT – Letter to NAE – October 1, 2015
 Mr. & Mrs. Salvatore Esposito, New Haven, CT – Letter to NAE – October 1, 2015
 Robert Henry & Roberta Esposito, New Haven, CT – Letter to NAE – October 1, 2015
 P.C., New Haven, CT – Letter to NAE – October 1, 2015
 D.C., New Haven, CT – Letter to NAE – October 1, 2015
 Robert Ferraioto, New Haven, CT – Letter to NAE – October 1, 2015
 Sheri Cacioppo, New Haven, CT – Letter to NAE – October 1, 2015
 Daniel Duncan, New Haven, CT – Letter to NAE – October 1, 2015
 M. Sprei, Wilton, CT – Letter to NAE – October 1, 2015
 M. Sprei (2), Wilton, CT – Letter to NAE – October 1, 2015
 Paul Bryan, Farmingdale, NY – Letter to NAE – October 1, 2015
 Karen Fowler, New Haven, CT – Letter to NAE – October 1, 2015
 Alan Smith, Granby, CT – Letter to NAE – September 30, 2015
 Edgar Lear, Westerly, RI – Letter to NAE – September 30, 2015
 State Representative Fred Camillo, Greenwich, CT – Email to NAE – September 30, 2015
 Barbara Mickut, Monroe, CT – Letter to NAE – September 30, 2015
 William St. John, Jr., Southbury, CT – Letter to NAE – September 30, 2015
 Carol Wilson, Cos Cob, CT – Letter to NAE – September 30, 2015
 Old Saybrook Chamber of Commerce, CT – Letter to NAE – September 30, 2015
 R.M. Harris, Cos Cob, CT – Letter to NAE – September 30, 2015
 Town of Groton, CT, City Mayor and Town Manager – Letter to NAE – September 30, 2015
 Town of Old Lyme, CT, First Selectwoman – Letter to NAE – September 30, 2015

NY State Parks, SHPO – Emails to NAE – September 28-30, 2015
 Gaetano Minervini, Nesconset, NY – Letter to NAE – September 30, 2015
 D. Byrd, Smithtown, NY – Letter to NAE – September 30, 2015
 Susan DellaPace, Nesconset, NY – Letter to NAE – September 30, 2015
 Nicole Spiegel, Nesconset, NY – Letter to NAE – September 30, 2015
 Diane and Joseph Zach, Nesconset, NY – Letter to NAE – September 30, 2015
 Kelly Tarello, Saint James, NY – Letter to NAE – Forwarded September 30, 2015
 William Berroyer, Nesconset, NY – Letter to NAE – Forwarded September 30, 2015
 Rosemary Martone, Smithtown, NY – Letter to NAE – Forwarded September 30, 2015
 Christina Martone, Smithtown, NY – Letter to NAE – Forwarded September 30, 2015
 M.P., Smithtown, NY – Letter to NAE – Forwarded September 30, 2015
 Zach P., Smithtown, NY – Letter to NAE – Forwarded September 30, 2015
 Kristin P., Smithtown, NY – Letter to NAE – Forwarded September 30, 2015
 M. P., Smithtown, NY – Letter to NAE – Forwarded September 30, 2015
 Candace and Vanessa Cruz, Nesconset, NY – Letter to NAE – Forwarded September 30, 2015
 Dawn Costello, NY – Letter to NAE – Forwarded September 30, 2015
 Sophie Wood, Wilton, CT – Letter to NAE – September 30, 2015
 Paul Soley, Wilton, CT – Letter to NAE – September 30, 2015
 Carol Angotta, Wilton, CT – Letter to NAE – September 30, 2015
 John Myers, Wilton, CT – Letter to NAE – September 30, 2015
 Jennifer Ahern, Wilton, CT – Letter to NAE – September 30, 2015
 B. Greenwood, Nesconset, NY – Email to NAE – Forwarded by CCE September 30, 2015
 Gennaro Iagallo, Hopewell Junction, NY – Letter to NAE – September 29, 2015
 U.S. Coast Guard, Sector NY – Letter to NAE – September 29, 2015
 Old Lyme Harbor Management Commission (Farman) – Email to NAE – September 29, 2015
 Richard Loh, Old Greenwich, CT – Letter to NAE – September 29, 2015
 Charles Judson, Smithtown, NY – Letter to NAE – September 29, 2015
 Attaches Citizens Campaign for the Environment News Letter
 Joan Bengtson, Nesconset, NY – Letter to NAE – September 29, 2015
 Christine Chromiak, Hamden, CT – Letter to NAE – September 29, 2015
 Sofya Meushikov, Shelton, CT – Letter to NAE – September 29, 2015
 Lindsay R., NY – Letter to NAE – Forwarded by CCE – September 29, 2015
 Nicole Villani, Nesconset, NY – Letter to NAE – September 29, 2015
 Amy Bodi, Saint James, NY – Letter to NAE – September 29, 2015
 Gayle J., Monroe, CT – Letter to NAE – September 29, 2015
 Frank Genova, Shelton, CT – Letter to NAE – September 29, 2015
 Frank Genova (2), Shelton, CT – Letter to NAE – September 29, 2015
 Ava Genova, Shelton, CT – Letter to NAE – September 29, 2015
 L. Genova, Shelton, CT – Letter to NAE – September 29, 2015
 Anita & Louis Papp, Monroe, CT – Letter to NAE – September 29, 2015
 Tyler Kekac, Chelton, CT – Letter to NAE – September 29, 2015
 Johnathan Cruz, Shelton, CT – Letter to NAE – September 29, 2015
 M & T Dunn, Shelton, CT – Letter to NAE – September 29, 2015
 Leonard Rosati, Shelton, CT – Letter to NAE – September 29, 2015
 Simon Province, Hartford, CT – Letter to NAE – September 28, 2015
 Matthew Bennett, Hartford, CT – Letter to NAE – September 28, 2015
 Andrew Rockwell, CT – Letter to NAE – September 28, 2015

Jack Leary III, Mystic, CT – Letter to NAE – September 28, 2015
 Andrew Helbig, Stonington, CT – Letter to NAE – September 28, 2015
 John Henry, Shelton, CT – Letter to NAE – September 28, 2015
 Gulf Oil, L.P., New Haven, CT – Letter to NAE – September 28, 2015
 Keith Congdon, CT – Letter to NAE – September 28, 2015
 Lawrence Smith, Noank, CT – Letter to NAE – September 28, 2015
 Marianne Urbanski, Noank, CT – Letter to NAE – September 28, 2015
 Pamela Plumeau, Noank, CT – Letter to NAE – September 28, 2015
 Regina Chase, Nonak, CT – Letter to NAE – September 28, 2015
 Roy Filkoff, South Windsor, CT – Letter to NAE – September 28, 2015
 Robert Phillips, Niantic, CT – Letter to NAE – September 28, 2015
 Richard Tilton, Farmington, CT – Letter to NAE – September 28, 2015
 Stephen & Elizabeth Beatson, Colchester, CT – Letter to NAE – September 28, 2015
 Steven Marenakos, Bloomfield, CT – Letter to NAE – September 28, 2015
 Douglas Oliver, UConn School of Medicine – Letter to NAE – September 28, 2015
 A.B., CT – Letter to NAE – September 28, 2015
 B. Gelozin, Shelton, CT – Letter to NAE – September 28, 2015
 Thomas Sheridan, Huntington, CT – Letter to NAE – September 28, 2015
 Grace Carino, Shelton, CT – Letter to NAE – September 28, 2015
 Elisa Uhrynowski, Shelton, CT – Letter to NAE – September 28, 2015
 Alice Taylor, Shelton, CT – Letter to NAE – September 28, 2015
 Kenneth Cerritelli, CT – Letter to NAE – September 28, 2015
 Cheryl Ventriglia, Shelton, CT – Letter to NAE – September 28, 2015
 Bruce Ventriglia, Shelton, CT – Letter to NAE – September 28, 2015
 Susan Dunigan, Shelton, CT – Letter to NAE – September 28, 2015
 Michael Dunigan, Shelton, CT – Letter to NAE – September 28, 2015
 Emalinda Krok, Shelton, CT – Letter to NAE – September 28, 2015
 Francine Garifo, Smithtown, NY – Letter to NAE – September 28, 2015
 Suzanne Arbocus, Stonington, CT – Letter to NAE – September 28, 2015
 William Arbocus, Stonington, CT – Letter to NAE – September 28, 2015
 Middlesex County Chamber of Commerce, CT – Letter to NAE – September 28, 2015
 Unit Owners Association at Guilford Yacht Club, CT – Letter to NAE – September 28, 2015
 Town of Essex, CT, First Selectman – Letter to NAE – September 28, 2015
 Niantic Bay Yacht Club, Niantic, CT – Letter to NAE – September 28, 2015
 Town of Sprague, CT, First Selectman – Letter to NAE – September 28, 2015
 David Hyman, Meridan, CT – Letter to NAE – September 28, 2015
 Donald Irion, Fairfield, CT – Letter to NAE – September 28, 2015
 Peter Tacy, Mystic, CT – Letter to NAE – September 28, 2015
 Dorothy Lupariello, Shelton, CT – Letter to NAE – September 28, 2015
 Debbie Russell, Shelton, CT – Letter to NAE – September 28, 2015
 Don Russell, Shelton, CT – Letter to NAE – September 28, 2015
 Jill Ferraro, Shelton, CT – Letter to NAE – September 28, 2015
 Karen Ferraro, Shelton, CT – Letter to NAE – September 28, 2015
 Vincent Ferraro, Shelton, CT – Letter to NAE – September 28, 2015
 Paul Antonik, Greenwich, CT – Letter to NAE – September 28, 2015
 Richard McKnett, Old Lyme, CT – Letter to NAE – September 28, 2015
 Dan, Ken, Alex and Jacob Thelen, Shelton, CT – Letter to NAE – Forwarded Sept 28, 2015

Grace Piscenelli, Shelton, CT – Letter to NAE with Drawing – Forwarded Sept 28, 2015
Cathy LeBlanc, CT – Letter to NAE – Forwarded September 28, 2015
Diane Torres, Shelton, CT – Letter to NAE – Forwarded September 28, 2015
The Patricks, Shelton, CT – Letter to NAE – Forwarded September 28, 2015
T.K.J., Wilton, CT – Letter to NAE – Forwarded September 28, 2015
Jacob Buccholtz, Shelton, CT – Letter to NAE – Forwarded September 28, 2015
Tiedemann, Wilton, CT – Letter to NAE – Forwarded September 28, 2015
Nat and Judy Florian, Farmington, CT – Letter to NAE – Forwarded September 28, 2015
Timothy Wells, Shelton, CT – Letter to NAE – Forwarded September 28, 2015
James Spielman, Wilton, CT – Letter to NAE – Forwarded September 28, 2015
J.B., CT – Letter to NAE – Forwarded September 28, 2015
S.A. Cone, Hamden, CT – Letter to NAE – Forwarded September 28, 2015
Anonymous, CT – Letter to NAE – Forwarded September 28, 2015
C. Landers, Farmington, CT – Letter to NAE – Forwarded September 28, 2015
Patricia Winalski, CT – Letter to NAE – Forwarded September 28, 2015
Illegible, Hamden, CT – Letter to NAE – Forwarded September 28, 2015
Nitya Shah, CT – Letter to NAE – Forwarded September 28, 2015
Barbara (Illegible), Farmington, CT – Letter to NAE – Forwarded September 28, 2015
Nicole Williams, Shelton, CT – Letter to NAE – Forwarded September 28, 2015
L.A., CT – Letter to NAE – Forwarded September 28, 2015
Megan Allen, CT – Letter to NAE – Forwarded September 28, 2015
Angie Golding, Shelton, CT – Letter to NAE – Forwarded September 28, 2015
Eleanor S., Shelton, CT – Letter to NAE – Forwarded September 28, 2015
Anonymous, CT – Letter to NAE – Forwarded September 28, 2015
L.J. (Illegible), Farmington, CT – Letter to NAE – Forwarded September 28, 2015
Hannah Mocciaie, Shelton, CT – Letter to NAE – Forwarded September 28, 2015
Joseph Tabarrini, Shelton, CT – Letter to NAE – Forwarded September 28, 2015
Eric (Unknown), Shelton, CT – Letter to NAE – Forwarded September 28, 2015
Sai Sambaraju, CT – Letter to NAE – Forwarded September 28, 2015
Joseph E. Keogan, Huntington, CT – Letter to NAE – Forwarded September 28, 2015
Jim Lesko, Shelton, CT – Letter to NAE – September 26, 2015
Steven Schneider, Hamden, CT – Letter to NAE – September 26, 2015
Illegible, Hamden, CT – Letter to NAE – September 26, 2015
Kathleen Hayes, Hamden, CT – Letter to NAE – September 26, 2015
Ruth Arnold, CT – Letter to NAE – September 25, 2015
Robert Carroll, Farmington, CT – Letter to NAE – September 25, 2015
Robert Helfrich, Farmington, CT – Letter to NAE – September 25, 2015
Kathryn Helfrich, Farmington, CT – Letter to NAE – September 25, 2015
Jillian Holt, Farmington, CT – Letter to NAE – September 25, 2015
Teresa Valentine, Farmington, CT – Letter to NAE – September 25, 2015
Lauren Petersen, Farmington, CT – Letter to NAE – September 25, 2015
Terry Czerwinski, Farmington, CT – Letter to NAE – September 25, 2015
Gopi Krishna Gottam, Farmington, CT – Letter to NAE – September 25, 2015
Sushma Cheruku, Farmington, CT – Letter to NAE – September 25, 2015
New London Port Authority, CT – Letter to NAE – September 25, 2015
Harbor Management Commission, Town of Essex, CT – Letter to NAE – September 25, 2015
Dinghy PRO, Essex, CT – Letter to NAE – September 25, 2015

Magellan Midstream Partners, LLC – Letter to NAE – September 25, 2015
Bette & Arthur Ledele, Calverton, NY – Letter to NAE – September 25, 2015
Rose Polis, Massapequa, NY – Letter to NAE – September 25, 2015
Rosemary Swanson, Farmington, CT – Letter to NAE – September 25, 2015
Mariola Anachasian, Farmington, CT – Letter to NAE – September 25, 2015
New Haven Port Authority, CT – Letter to NAE – September 24, 2015
Kate Rusin, Wilton, CT – Letter to NAE – Forwarded September 24, 2015
Nadia Petraccone, Farmington, CT – Letter to NAE – Forwarded September 24, 2015
Jessica, Shelton, CT – Letter to NAE – Forwarded September 24, 2015
A. Daniele, Farmington, CT – Letter to NAE – Forwarded September 24, 2015
Anonymous, CT – Letter to NAE – Forwarded September 24, 2015
M. Booklin, Shelton, CT – Letter to NAE – Forwarded September 24, 2015
Alia Mostafa, Trumbull, CT – Letter to NAE – Forwarded September 24, 2015
Deborah Bianca, Farmington, CT – Letter to NAE – Forwarded September 24, 2015
Rosemary Gimly, Wilton, CT – Letter to NAE – Forwarded September 24, 2015
Eileen Helinski, Shelton, CT – Letter to NAE – Forwarded September 24, 2015
Illegible, Farmington, CT – Letter to NAE – Forwarded September 24, 2015
William Soter, Shelton, CT – Letter to NAE – Forwarded September 24, 2015
Jeremy Ames, CT – Letter to NAE – Forwarded September 24, 2015
Fiona Conway, Wilton, CT – Letter to NAE – Forwarded September 24, 2015
Aislynn Conway, Wilton, CT – Letter to NAE – Forwarded September 24, 2015
Wayne Keely, Wilton, CT – Letter to NAE – Forwarded September 24, 2015
Dana Haddox, Wilton, CT – Letter to NAE – Forwarded September 24, 2015
Cameron Ferraro, CT – Letter to NAE – Forwarded September 24, 2015
Florence Perrino, CT – Letter to NAE – Forwarded September 24, 2015
Peter Gerali, Farmington, CT – Letter to NAE – Forwarded September 24, 2015
R. Haumann, Farmington, CT – Letter to NAE – Forwarded September 24, 2015
Alex Busel, Farmington, CT – Letter to NAE – Forwarded September 24, 2015
David Busel, Farmington, CT – Letter to NAE – Forwarded September 24, 2015
Steven Busel, Farmington, CT – Letter to NAE – Forwarded September 24, 2015
Maggie Busel, Farmington, CT – Letter to NAE – Forwarded September 24, 2015
Teresa Small, Smithtown, NY – Letter to NAE – September 24, 2015
Brian Lux, Farmington, CT – Letter to NAE – Forwarded September 24, 2015
Brandford Ives, CT – Letter to NAE – Forwarded September 24, 2015
Amy Duquette, Farmington, CT – Letter to NAE – Forwarded September 24, 2015
David Hayden, CT – Letter to NAE – Forwarded September 24, 2015
Adam Keely, CT – Letter to NAE – Forwarded September 24, 2015
City of Norwich, CT, Mayor Deberay Hinchey – Letter to NAE – September 24, 2015
Nancy & Donald Simmonds, Shelton, CT – Letter to NAE – September 24, 2015
Thomas Raiola, Branford, CT – Letter to NAE – September 24, 2015
Rudy W., NY – Letter to NAE – Forwarded September 24, 2015
E.S., NY (Illegible) – Letter to NAE – Forwarded September 24, 2015
Matthew Engel, NY – Letter to NAE – Forwarded September 24, 2015
Barbara Matthews, NY – Letter to NAE – Forwarded September 24, 2015
Mary Slevin Brodmerkel, Smithtown, NY – Letter to NAE – Forwarded September 24, 2015
Brian Given, NY – Letter to NAE – Forwarded September 24, 2015
Robert Martens, Miller Place, NY – Letter to NAE – Forwarded September 24, 2015

Cynthia Jorgensen, Smithtown, NY – Letter to NAE – September 24, 2015
 Ashley DiScalfani, NY – Letter to NAE – September 24, 2015
 Alyssa Kralt, NY – Letter to NAE – September 24, 2015
 Catherine Sullivan, NY – Letter to NAE – September 24, 2015
 Gerald Conetta, Huntington, CT – Letter to NAE – September 24, 2015
 Elizabeth Conetta, Huntington, CT – Letter to NAE – September 24, 2015
 Kevin Bayusik, CT – Letter to NAE – September 24, 2015
 Louise (Illegible), CT – Letter to NAE – September 24, 2015
 Cathy Howland, Shelton, CT – Letter to NAE – September 24, 2015
 Dan Friedman, Smithtown, NY – Letter to NAE – September 24, 2015
 Joan Rindfess, Smithtown, NY – Letter to NAE – September 24, 2015
 Sonja Daniels, Smithtown, NY – Letter to NAE – September 24, 2015
 Paul Filippotti, Mystic, CT – Letter to NAE – September 24, 2015
 Ronald Floyd, Sr., Mystic, CT – Letter to NAE – September 24, 2015
 City of New London, Fire Dept (Henry Kidd, Jr., Chief) – Letter to NAE – Sept 24, 2015
 Town of Guilford, CT, Harbor Management Commission – Email to NAE – Sept 23, 2015
 Town of East Lyme, CT, First Selectman– Letter to NAE – September 23, 2015
 Christina McGugan, Gwenmor Marina, Mystic, CT– Letter to NAE – September 23, 2015
 Heather Donahue, Mystic, CT – Letter to NAE – September 23, 2015
 David Tetlow, Mystic, CT – Letter to NAE – September 23, 2015
 Walter R., Mystic, CT – Letter to NAE – September 23, 2015
 Charles, Michael and Kathleen Kelly, CT – Letter to NAE – September 23, 2015
 Christine Lawrence, Shelton, CT – Letter to NAE – September 23, 2015
 Lisa Adriani, Shelton, CT – Letter to NAE – September 23, 2015
 Diane Betts, Shelton, CRT – Letter to NAE – September 23, 2015
 Fred Wilson, CT – Letter to NAE – September 23, 2015
 G. Testo, Shelton, CT – Letter to NAE – September 23, 2015
 Taryn Mesaros, Shelton, CT – Letter to NAE – September 23, 2015
 Drew Pantino, Port Jefferson, NY – Letter to NAE – September 23, 2015
 Samantha Pantino, Port Jefferson, NY – Letter to NAE – September 23, 2015
 Sean Pantino, Port Jefferson, NY – Letter to NAE – September 23, 2015
 Deborah Pantino, Port Jefferson, NY – Letter to NAE – September 23, 2015
 Michael E. Passero, New London City Council, CT – Letter to NAE – September 23, 2015
 Masons Island Marina, Mystic, CT – Letter to NAE – September 23, 2015
 Riverside Yacht Club, Greenwich, CT – Letter to NAE – September 23, 2015
 Town of Waterford, CT – Letter to NAE – September 23, 2015
 Abby & Brian Walker, Wilton, CT – Letter to NAE – September 23, 2015
 William Comer, Wilton, CT – Letter to NAE – September 23, 2015
 Margaret Silverman, Melville, NY – Letter to NAE – September 23, 2015
 Howard Silverman, Melville, NY – Letter to NAE – September 23, 2015
 Benjamin Silverman, Melville, NY – Letter to NAE – September 23, 2015
 Ann Marie Bracken, Miller Place, NY – Letter to NAE – September 23, 2015
 Aileen Poerio, NY – Letter to NAE – September 23, 2015
 Lori Markland, Miller Place, NY – Letter to NAE – September 23, 2015
 Patricia & Robert Vanderhone, Miller Place, NY – Letter to NAE – September 23, 2015
 Heather Prendergast, NY – Letter to NAE – FW by CCE September 23, 2015
 Christine Pugliese, NY – Letter to NAE – FW by CCE September 23, 2015

Kathleen Newton, East Setauket, NY – Letter to NAE – FW by CCE September 23, 2015
 John Schultze, NY – Letter to NAE – FW by CCE September 23, 2015
 Brian Harvey, East Setauket, NY – Letter to NAE – FW by CCE September 23, 2015
 W.L., East Setauket, NY – Letter to NAE – FW by CCE September 23, 2015
 Lubia Bergold, Port Jefferson Station, NY – Letter to NAE – FW by CCE Sept 23, 2015
 William Bergold, Port Jefferson Station, NY – Letter to NAE – FW by CCE Sept 23, 2015
 Julie Marshall, East Setauket, NY – Letter to NAE – FW by CCE September 23, 2015
 Susan Marshall, East Setauket, NY – Letter to NAE – FW by CCE September 23, 2015
 Robert D'Italia, NY – Letter to NAE – FW by CCE September 23, 2015
 C., NY – Letter to NAE – FW by CCE September 23, 2015
 Brianna Lennon, NY – Letter to NAE – FW by CCE September 23, 2015
 L. Lennon, NY – Letter to NAE – FW by CCE September 23, 2015
 Laurie Haas, NY – Letter to NAE – FW by CCE September 23, 2015
 Greater Mystic Chamber of Commerce, CT – Letter to NAE – September 22, 2015
 Town of Greenwich, CT, DPW (Amy Siebert) – Email to NAE – September 22, 2015
 City of New Haven, CT, Harbormaster (John Izzo) – Letter to NAE – Sept 22, 2015
 Susan Fales, Miller Place, NY – Letter to NAE – September 22, 2015
 Mary Gardner, Old Saybrook, CT – Letter to NAE – September 22, 2015
 David Hooghkirk, Chetser, CT – Letter to NAE – September 22, 2015
 Angus McDonald, Deep River, CT – Letter to NAE – September 22, 2015
 Todd Noti, Lyme, CT – Letter to NAE – September 22, 2015
 William Price, Groton, CT – Letter to NAE – September 22, 2015
 Fern Tremblay III, East Haddam, CT – Letter to NAE – September 22, 2015
 Beverly Grzymala, West Haven, CT – Letter to NAE – September 22, 2015
 Brewer Bruce & Johnson's Marina, Branford, CT – Letter to NAE – September 22, 2015
 Mayor Marian Galbraith, City of Groton, CT – Letter to NAE – September 22, 2015
 Patricia Bollettieri, West Haven, CT – Letter to NAE – September 22, 2015
 The Belle Haven Club, Greenwich, CT – Letter to NAE – September 22, 2015
 Town of East Lyme, CT, Harbormaster, – Letter to NAE – September 22, 2015
 Mayor John A. Rodolico, Town of Ledyard, CT – Letter to NAE – September 22, 2015
 Jamie & Andrew Adamski, Port Jefferson Station, NY – Letter to NAE – September 22, 2015
 NAE (S. Wolf) – Email to Citizens Campaign for the Environment – September 22, 2015
 Michele Lockwood, New Haven CT – Email to NAE (Morris Cove) – September 22, 2015
 Daniel Glidden, New Haven, CT – Email to NAE (Morris Cove) – September 22, 2015
 The Ryan Family, Melville, NY – Letter to NAE – FW by CCE September 22, 2015
 Illegible, NY – Letter to NAE – FW by CCE September 22, 2015
 Patricia Abrams, Melville, NY – Letter to NAE – FW by CCE September 22, 2015
 David Abrams, Melville, NY – Letter to NAE – FW by CCE September 22, 2015
 Mark Fondacaro, NY – Letter to NAE – FW by CCE September 22, 2015
 Amy Smith, NY – Letter to NAE – September 22, 2015
 James Fonti, Port Jefferson Station, NY – Letter to NAE – September 22, 2015
 Erin Giannelli, East Setauket, NY – Letter to NAE – September 22, 2015
 S. Melilo, Port Jefferson Station, NY – Letter to NAE – September 22, 2015
 G. Munson, NY – Letter to NAE – September 22, 2015
 L. Munson, NY – Letter to NAE – September 22, 2015
 Grace Iannuccilli, NY – Letter to NAE – September 22, 2015
 Mary and John Donohue, Shelton, CT – Letter to NAE – September 22, 2015

Michelle Hayes, Shelton, CT – Letter to NAE – September 22, 2015
 Janice Semanchik, Shelton, CT – Letter to NAE – September 22, 2015
 James Rinaldi, Trumbull, CT – Letter to NAE – September 22, 2015
 Rosemary Gallett, CT – Letter to NAE – September 22, 2015
 Sabrina Vega, Shelton, CT – Letter to NAE – September 22, 2015
 Christopher Johnson, Mystic, CT – Letter to NAE – September 22, 2015
 Ryan Mercado, Gwenmor Marina, Mystic, CT – Letter to NAE – September 22, 2015
 Elizabeth Early, Mystic, CT – Letter to NAE – September 22, 2015
 Groton Business Association, Mystic, CT – Letter to NAE – September 21, 2015
 Brian Bradley, Mystic, CT – Letter to NAE – September 21, 2015
 George Burnside, Mystic, CT – Letter to NAE – September 21, 2015
 Steven Gilbert, Pawcatuck, CT – Letter to NAE – September 21, 2015
 Kenneth Dombroski II, Gwenmor Marina, Mystic, CT – Letter to NAE – September 21, 2015
 David Crompton, Gwenmor Marina, Mystic, CT – Letter to NAE – September 21, 2015
 David Bliven, Gwenmor Marina, Mystic, CT – Letter to NAE – September 21, 2015
 Matt Amaral, Gwenmor Marina, Mystic, CT – Letter to NAE – September 21, 2015
 Dennis Allen, Gwenmor Marina, Mystic, CT – Letter to NAE – September 21, 2015
 Doug Davis, Gwenmor Marina, Mystic, CT – Letter to NAE – September 21, 2015
 William Wickesham, Wilton, CT – Letter to NAE – September 21, 2015
 Olga Seamuff, CT – Letter to NAE – September 21, 2015
 Eliz (Illegible), Wilton, CT – Letter to NAE – September 21, 2015
 Jenn Wadehra, Wilton, CT – Letter to NAE – September 21, 2015
 Santa Maria Scalza & Robert Scalza, Melville, NY – Letter to NAE – September 21, 2015
 Kathleen Cruz, Smithtown, NY – Letter to NAE – September 21, 2015
 Robert Sobieski, Melville, NY – Letter to NAE – September 21, 2015
 Victoria DeMasi, Melville, NY – Letter to NAE – September 21, 2015
 Joseph DeMasi, Melville, NY – Letter to NAE – September 21, 2015
 Elizabeth Benjamin, Melville, NY – Letter to NAE – September 21, 2015
 Phyllis Sarcona, Melville, NY – Letter to NAE – September 21, 2015
 Anna Hocknell, Melville, NY – Letter to NAE – September 21, 2015
 Middle Cove Marina, Essex, CT – Letter to NAE – September 21, 2015
 City of New Haven, Planning Department – Letter to NAE – September 21, 2015
 Roberta Verbyla, Unionville, CT – Letter to NAE – September 21, 2015
 Steven Kaplan, President, University of New Haven – Letter to NAE – September 21, 2015
 Bette Adams, Saint James, NY – Letter to NAE – September 21, 2015
 Beverly Wirtyel – Letter to NAE – September 21, 2015
 Kmikael Raimo, Smithtown, NY – Letter to NAE – September 21, 2015
 Santa Maria and Robert Scalza, Melville, NY – Letter to NAE – September 21, 2015
 David Carr, North Haven, CT – Email to NAE (Morris Cove) – September 21, 2015
 Catherine Rau, NY – Letter to NAE – September 21, 2015
 Eric Peterson, NY – Letter to NAE – Forwarded September 21, 2015
 Joe Mann, Farmingdale, NY – Letter to NAE – Forwarded September 21, 2015
 Kristina DeStefano, NY – Letter to NAE – Forwarded September 21, 2015
 Illegible, NY – Letter to NAE – Forwarded September 21, 2015
 Kevin Hufsmith, Saint James, NY – Letter to NAE – Forwarded September 21, 2015
 Ally Troutman, Saint James, NY – Letter to NAE – Forwarded September 21, 2015
 Brian Troutman, Saint James, NY – Letter to NAE – Forwarded September 21, 2015

Meagan Troutman, Saint James, NY – Letter to NAE – Forwarded September 21, 2015
 Kathleen Troutman, Saint James, NY – Letter to NAE – Forwarded September 21, 2015
 Kathleen Troutman, Saint James, NY – Letter to NAE – Forwarded September 21, 2015
 John Vetter, Saint James, NY – Letter to NAE – Forwarded September 21, 2015
 Joe D., NY – Letter to NAE – Forwarded September 21, 2015
 Lou Guerra, Saint James, NY – Letter to NAE – Forwarded September 21, 2015
 C.L., NY – Letter to NAE – Forwarded September 21, 2015
 Christopher M., Smithtown, NY – Letter to NAE – Forwarded September 21, 2015
 J. (Illegible), NY – Letter to NAE – Forwarded September 21, 2015
 Julie Anna Lippman, NY – Letter to NAE – Forwarded September 21, 2015
 Rita Morris, NY – Letter to NAE – Forwarded September 21, 2015
 Illegible, NY – Letter to NAE – Forwarded September 21, 2015
 Thomas Law, Mystic, CT – Letter to NAE – September 20, 2015
 George McGugan, Gwenmor Marina, Mystic, CT – Letter to NAE – September 20, 2015
 Marguerite McGugan, Gwenmor Marina, Mystic, CT – Letter to NAE – September 20, 2015
 Antonia Ginnetti & Ronald Arena (Morris Cove), CT – Letter to NAE – September 20, 2015
 Linda Lee, North Stonington, CT – Letter to NAE – September 19, 2015
 Honorable Dannel P. Malloy, Governor, CT – Letter to Lt General Bostick – Sept 18, 2015
 Lisa Steele, Gwenmor Marina, Mystic, CT – Letter to NAE – September 18, 2015
 Kathy Eisenhauer, CT – Letter to NAE – September 18, 2015
 Beverly Wiertyel, Smithtown, NY – Letter to NAE – September 18, 2015
 Southeastern Connecticut Council of Governments – Letter to NAE – September 18, 2015
 John Kiszkiel, Mystic, CT – Letter to NAE – September 18, 2015
 Robert Murphy, Mystic, CT – Letter to NAE – September 18, 2015
 Ethan Murphy, Mystic, CT – Letter to NAE – September 18, 2015
 Joe Fiorillo, Mystic, CT – Letter to NAE – September 18, 2015
 Ernest Murphy – Gwenmor Marine Contracting, CT – Letter to NAE – September 18, 2015
 Kieth McGugan – Gwenmor Marine Contracting, CT – Letter to NAE – September 18, 2015
 George McGugan – Gwenmor Marine Contracting, CT – Letter to NAE – Sept 18, 2015
 Michael Whitten – Gwenmor Marine Contracting, CT – Letter to NAE – September 18, 2015
 Wendy Murphy – Gwenmor Marine Contracting, CT – Letter to NAE – September 18, 2015
 Steven Zummo – Gwenmor Marine Contracting, CT – Letter to NAE – September 18, 2015
 Chad Taylor – Gwenmor Marine Contracting, CT – Letter to NAE – September 18, 2015
 Michael Beaulieu – Gwenmor Marine Contracting, CT – Letter to NAE – September 18, 2015
 Barbara Matthews – Letter to NAE – September 18, 2015
 Barbara and George Rom, Saint James, NY – Letter to NAE – September 18, 2015
 Mary Cillo, NY – Letter to NAE – September 18, 2015
 Andrea Cillo, NY – Letter to NAE – September 18, 2015
 Elaine Perellie, Trumbull, CT – Letter to NAE – September 18, 2015
 Joanne Purcell, Trumbull, CT – Letter to NAE – September 18, 2015
 Ajay Ghosh, Trumbull, CT – Letter to NAE – September 18, 2015
 Mary DeAngelo, Saint James, NY – Letter to NAE – September 18, 2015
 David Friedman, Saint James, NY – Letter to NAE – September 18, 2015
 Rebecca Friedman, Saint James, NY – Letter to NAE – September 18, 2015
 Mr. Romano, Smithtown, NY – Letter to NAE – September 18, 2015
 Jillian Dempsey, Smithtown, NY – Letter to NAE – September 18, 2015
 Lillian Monroig, Saint James, NY – Letter to NAE – September 18, 2015

Peter Walling, Smithtown, NY – Letter to NAE – September 18, 2015
 Tom Jones, Saint James, NY – Letter to NAE – September 18, 2015
 CT Office of Policy & Management – Statement Submitted at Public Hearing – 17 Sept 2015
 Monti Rolli, CT – Letter to NAE – September 17, 2015
 Jonathan Sibley, Haddam, CT – Letter to NAE – September 17, 2015
 Jim Sibley, Haddam, CT – Letter to NAE – September 17, 2015
 Leendert Van Vliet, Old Saybrook, CT – Letter to NAE – September 17, 2015
 Michael Bochow, Torrington, CT – Letter to NAE – September 17, 2015
 Jerome Schierbert, West Hartford, CT – Letter to NAE – September 17, 2015
 Charles Purdum, Essex, CT – Letter to NAE – September 17, 2015
 John (Illegible), CT – Letter to NAE – September 17, 2015
 Carol Cross, East Haddam, CT – Letter to NAE – September 17, 2015
 Captain Robert Mould, REM yacht Repair, Rowayton, CT – Letter to NAE – Sept 17, 2015
 W. Kurt Roemhild, Chester Point Marina, Deep River CT – Letter to NAE – Sept 17, 2015
 Paul Chiapetta (Chiappetta Welding), Riverside, CT – Letter to NAE – September 17, 2015
 Riverscape Marina, Peter Mottolese, Cos Cob, CT – Letter to NAE – September 17, 2015
 William Ingraham, Sportsmen’s Den, Cos Cob, CT – Letter to NAE – September 17, 2015
 Amy Clark, CT – Email to NAE – September 17, 2015
 Lillian Fong, Cos Cob, CT – Letter to NAE – September 17, 2015
 Paul Ceverrette, CT – Letter to NAE – September 17, 2015
 Tony Toscano, CT – Letter to NAE – September 17, 2015
 James, Dawn & Mia Sullivan, St James, NY – Letter with Drawing to NAE – Sept 17, 2015
 David Croule, Milford, CT – Letter to NAE – September 17, 2015
 John P. Zable, Stamford, CT – Letter to NAE – September 17, 2015
 K.P., Uncasville, CT – Letter to NAE – September 17, 2015
 Michelle Fitzpatrick, Fairfield, CT – Letter to NAE – September 17, 2015
 Paul J. Zable, Old Saybrook, CT – Letter to NAE – September 17, 2015
 W.T. Gardella, Easton, CT – Letter to NAE – September 17, 2015
 Eric Ramotowski, CT – Letter to NAE – September 17, 2015
 John P. Zable, Springfield, MA – Letter to NAE – September 17, 2015
 Anna Hannan, Windcheck Magazine, Stratford, CT – Letter to NAE – September 17, 2015
 Palmer Point Marina, Cos Cob, CT – Letter to NAE – September 17, 2015
 Kimberly Savvaides, Wilton, CT – Letter to NAE – September 17, 2015
 Paul Fitzpatrick, Fitzpatrick Agency, Bridgeport, CT – Letter to NAE – September 17, 2015
 Bill Jennings, Northeast Bow Thrusters, West Mystic, CT – Letter to NAE – Sept 17, 2015
 Andrew C., Boat-Name-Gear, Newington, CT – Letter to NAE – September 17, 2015
 Chris Uscinski, Boaters Buddy, Clinton, CT – Letter to NAE – September 17, 2015
 Frederick Kreuter, Cos Cob, CT – Letter to NAE – September 17, 2015
 Gary Moir, NE Cycle Center, Hartford, CT – Letter to NAE – September 17, 2015
 Dibbon Koy, Coventry, CT – Letter to NAE – September 17, 2015
 Kurt Kleefled, Northeast Marine Improvements, Essex, CT – Letter to NAE – Sept 17, 2015
 Laura Komainie, Trumbull, CT – Letter to NAE – September 17, 2015
 Natasha Lee, Uncasville, CT – Letter to NAE – September 17, 2015
 Norwalk Cove Marina, Stephen Babson, Norwalk, CT – Letter to NAE – September 17, 2015
 Scott Sundholm, S&S Marine, LLC, Old Saybrook, CT – Letter to NAE – Sept 17, 2015
 Thomas Krivickas, Boatworks of South Windsor, CT – Letter to NAE – September 17, 2015
 William Gardella, Rex Marine Center, Inc., Norwalk, CT – Letter to NAE – Sept 17, 2015

George C., Norwalk, CT – Letter to NAE – September 17, 2015
 Josh Caldwell, Wilton, CT – Letter to NAE – September 17, 2015
 Joseph Digiose, Comack Fire District – Letter to NAE – September 17, 2015
 Anne Hannan, Stratford, CT – Letter to NAE – September 17, 2015
 Catherine Paquin, Wilton, CT – Letter to NAE – September 17, 2015
 Riverscape Marina, Cos Cob, CT – Letter to NAE – September 17, 2015
 Inge Goldstein, Sound Beach, NY – Letter to NAE – September 17, 2015
 Saybrook Point Inn, CT – Letter to NAE – September 17, 2015
 Connecticut Council of Small Towns – Letter to NAE – September 17, 2015
 Guilford Boat Yards, Inc., CT – Letter to NAE – September 17, 2015
 Jefferson Harris, New London, CT – Letter to NAE – September 17, 2015
 John Ehler, Saint James, NY – Letter to NAE – September 17, 2015
 Alena Downing, Saint James, NY – Letter to NAE – September 17, 2015
 Collin Downing, Saint James, NY – Letter to NAE – September 17, 2015
 Kylie Downing, Saint James, NY – Letter to NAE – September 17, 2015
 Ryan Downing, Saint James, NY – Letter to NAE – September 17, 2015
 Ashley Downing, Saint James, NY – Letter to NAE – September 17, 2015
 Regina Downing, Saint James, NY – Letter to NAE – September 17, 2015
 Brian Downing, Saint James, NY – Letter to NAE – September 17, 2015
 Robert H., Saint James, NY – Letter to NAE – September 17, 2015
 Ehlana Strzelczyk, Saint James, NY – Letter to NAE – September 17, 2015
 Debra Strzelczyk, Saint James, NY – Letter to NAE – September 17, 2015
 Lynn Hall, Northport, NY – Letter to NAE – September 17, 2015
 Carol Bond, NY – Letter to NAE – September 17, 2015
 Margaret Weiss, Saint James, NY – Letter to NAE – September 17, 2015
 Pat Majosky, NY – Letter to NAE – September 17, 2015
 Adam Harris, Saint James, NY – Letter to NAE – September 17, 2015
 Diane Harris, Saint James, NY – Letter to NAE – September 17, 2015
 Leslie Price, Saint James, NY – Letter to NAE – September 17, 2015
 Mary C., Saint James, NY – Letter to NAE – September 17, 2015
 Mr. & Mrs. William Higgins – Email to NAE – September 16, 2015
 Robert Mayernick, CT – Letter to NAE – September 16, 2015
 Margaret Ficano, Shelton, CT – Letter to NAE – September 16, 2015
 Edward Carroll, Shelton, CT – Letter to NAE – September 16, 2015
 Chelsea Kryger, Shelton, CT – Letter to NAE – September 16, 2015
 J. H., CT – Letter to NAE – September 16, 2015
 John & Bonnie Searles, Shelton, CT – Letter to NAE – September 16, 2015
 New York State Assemblyman Steven Englebright.– Letter to NAE – September 16, 2015
 Christine Palumbo, Commack, NY – Letter to NAE – September 16, 2015
 Catherine Rice, Smithtown, NY – Letter to NAE – September 16, 2015
 Peconic Estuary Program CEC – Letter to NAE – Postmarked September 16, 2015
 Ross Herzog, Smithtown, NY – Letter to NAE – Received September 16, 2015
 Theresa Grebla, Shelton, CT – Letter to NAE – September 16, 2015
 T. Hanko, Shelton, CT – Letter to NAE – September 16, 2015
 Patrice Hanko, Shelton, CT – Letter to NAE – September 16, 2015
 Citizens Campaign for the Environment, et al – Letter to NY Governor Cuomo –
 September 16, 2015 – Copy Submitted at Public Hearing

Joseph Baggette, NY – Letter to NAE – Forwarded September 16, 2015
Connie Parisi, Commack, NY – Letter to NAE – Forwarded September 16, 2015
Karen Orrach, NY – Letter to NAE – Forwarded September 16, 2015
L & J Gagliano, NY – Letter to NAE – Forwarded September 16, 2015
L. Gagliano, NY – Letter to NAE – Forwarded September 16, 2015
K. A., NY – Letter to NAE – September 16, 2015
Lauren Hendle, NY – Letter to NAE – September 16, 2015
Jennifer Ricciardi, NY – Letter to NAE – Forwarded September 16, 2015
Amanda Greco, NY – Letter to NAE – September 16, 2015
Darlene Greco, NY – Letter to NAE – September 16, 2015
Troy Glick, Commack, NY – Letter to NAE – September 16, 2015
Patricia Glick, Commack, NY – Letter to NAE – September 16, 2015
Danielle Rogan, Smithtown, NY – Letter to NAE – Forwarded September 16, 2015
Mike Bailey, Commack, NY – Letter to NAE – Forwarded September 16, 2015
Damien Betner, Northport, NY – Letter to NAE – Forwarded September 16, 2015
Marc Segal, Smithtown, NY – Letter to NAE – Forwarded September 16, 2015
Frank Potucek, Smithtown, NY – Letter to NAE – September 16, 2015
Diane Geringer, NY – Letter to NAE – September 16, 2015
Cameron Campbell, Smithtown, NY – Letter to NAE – Forwarded September 16, 2015
Erin Campbell, Smithtown, NY – Letter to NAE – Forwarded September 16, 2015
Christopher and Carol Duffner, Hauppauge, NY – Letter to NAE – September 16, 2015
Kylie Benz, Smithtown, NY – Letter to NAE – September 15, 2015
Rhianna Benz, Smithtown, NY – Letter to NAE – September 15, 2015
Danielle B. Benz, Smithtown, NY – Letter to NAE – September 15, 2015
William Norton, Smithtown, NY – Letter to NAE – September 15, 2015
Doreen Murphey, NY – Letter to NAE – September 15, 2015
Illegible Name, Unionville, CT – Letter to NAE – Forwarded September 15, 2015
Thomas Graves, Farmington, CT – Letter to NAE – Forwarded September 15, 2015
Marlene Bradshaw, Farmington, CT – Letter to NAE – Forwarded September 15, 2015
Roger DaSilva, Farmington, CT – Letter to NAE – Forwarded September 15, 2015
Michael Berggren, Farmington, CT – Letter to NAE – Forwarded September 15, 2015
Heather Saia, CT – Letter to NAE – Forwarded September 15, 2015
Myron Yousman, Farmington, CT – Letter to NAE – Forwarded September 15, 2015
Jacob Textor, CT – Letter to NAE – Forwarded September 15, 2015
Ari-Anna Poole, Unionville, CT – Letter to NAE – Forwarded September 15, 2015
Heather Johnson-Poole, Unionville, CT – Letter to NAE – Forwarded September 15, 2015
Kyle Poole, Unionville, CT – Letter to NAE – Forwarded September 15, 2015
Stephanie Stewart, Farmington, CT – Letter to NAE – Forwarded September 15, 2015
Sameh Khalil, Unionville, CT – Letter to NAE – Forwarded September 15, 2015
Brian Seholm, Unionville, Ct – Letter to NAE – Forwarded September 15, 2015
Heather Powers, Niantic, CT – Letter to NAE – Forwarded September 15, 2015
Keliana Bovat, Unionville, CT – Letter to NAE – Forwarded September 15, 2015
Steve Iritano, Farmington, CT – Letter to NAE – Forwarded September 15, 2015
Grace (Illegible Name), Unionville, CT – Letter to NAE – Forwarded September 15, 2015
Wendy & Gary Grant, Glastonbury, CT – Letter to NAE – Forwarded September 15, 2015
Joan Lachance, CT – Letter to NAE – Forwarded September 15, 2015
Al Saade, Farmington, CT – Letter to NAE – Forwarded September 15, 2015

Chelsea Gustafson, Unionville, CT – Letter to NAE – Forwarded September 15, 2015
Jackeline Diaz, Unionville, CT – Letter to NAE – Forwarded September 15, 2015
Irene Grey, CT – Letter to NAE – Forwarded September 15, 2015
Janet Spasiano, Unionville, CT – Letter to NAE – Forwarded September 15, 2015
Linda Ronning, Smithtown, NY – Letter to NAE – September 15, 2015
Wading River Civic Association, NY – Letter to NAE – September 15, 2015
Christine O’Conner, Farmington, CT – Letter to NAE – September 15, 2015
Robert LaRocco, Hauppauge, NY – Letter to NAE – September 15, 2015
Richard Kramer, Niantic, CT – Letter – September 15, 2015
Darci Lombardo, Old Saybrook, CT – Letter to NAE – Postmarked September 15, 2015
John Lombardo, Old Saybrook, CT – Letter to NAE – Postmarked September 15, 2015
Stephen Tagliatela, Old Saybrook, CT – Letter to NAE – Postmarked September 15, 2015
B. Lash, Old Saybrook, CT – Letter to NAE – Postmarked September 15, 2015
Lawre Casler, North Haven, CT – Letter to NAE – Postmarked September 15, 2015
William Baffo, Smithtown, NY – Letter to NAE – September 15, 2015
Paul and Deborah Bella, Commack, NY – Letter to NAE – Forwarded September 15, 2015
Chong Soon L, NY – Letter to NAE – Forwarded September 15, 2015
Frances Feil, Farmingdale, NY – Letter to NAE – Forwarded September 15, 2015
Patricia Murtagh, NY – Letter to NAE – Forwarded September 15, 2015
Roxanne Basandella, NY – Letter to NAE – Forwarded September 15, 2015
Lenora Chechilo, NY – Letter to NAE – Forwarded September 15, 2015
Illegible, NY – Letter to NAE – Forwarded September 15, 2015
Denise Valentine, NY – Letter to NAE – September 15, 2015
Stephanei Trees, NY – Letter to NAE – September 15, 2015
Richard Coster, Hauppauge, NY – Letter to NAE – September 15, 2015
Brittney Field, Hauppauge, NY – Letter to NAE – September 15, 2015
Kevin Fitzpatrick, Hauppauge, NY – Letter to NAE – September 15, 2015
Darinda Field, Hauppauge, NY – Letter to NAE – September 15, 2015
S. E. Brumson, Smithtown, NY – Letter to NAE – September 15, 2015
Michael Alessi, Hauppauge, NY – Letter to NAE – Forwarded September 15, 2015
Jean Caurant, Smithtown, NY – Letter to NAE – Forwarded September 15, 2015
Thomas DiCicco, Smithtown, NY – Letter to NAE – Forwarded September 15, 2015
Aileen Heyden, Mount Sinai, NY – Letter to NAE – Forwarded September 15, 2015
Lisa Jackman, NY – Letter to NAE – Forwarded September 15, 2015
P. (Illegible), Hauppauge, NY – Letter to NAE – Forwarded September 15, 2015
Mary Grattan, Farmington, CT – Letter to NAE – September 15, 2015
John Pudlik, Farmington, CT – Letter to NAE – September 15, 2015
Patricia Fitzgerald, Wilton, CT – Letter to NAE – September 15, 2015
Richard Gregory, Farmington, CT – Letter to NAE – September 15, 2015
Amy Carlucci Wu, Farmington, CT – Letter to NAE – September 15, 2015
Robert Galante, Farmington, CT – Letter to NAE – September 15, 2015
Terrence O’Brien, Unionville, CT – Letter to NAE – September 15, 2015
Gary Saunders, Unionville, CT – Letter to NAE – September 15, 2015
Linda & Paul Auriemma, New Suffolk, NY – Email to NAE – September 14, 2015
Jeanine Fazzini, Smithtown, NY – Letter to NAE – September 14, 2015
John Eiamundo, NY – Letter to NAE – September 14, 2015
Winfred Chesley, Wilton, CT – Letter to NAE – September 14, 2015

Corey Sabia, Wilton, CT – Letter to NAE – September 14, 2015
 Anne Munkenbeck, Wilton, CT – Letter to NAE – September 14, 2015
 Thomas Scabia, Wilton, CT – Letter to NAE – September 14, 2015
 Andrew Foote, Wilton, CT – Letter to NAE – September 14, 2015
 Susanna Carillo, Wilton, CT – Letter to NAE – September 14, 2015
 Piper Carillo-Foote, Wilton, CT – Letter to NAE – September 14, 2015
 Everett Carillo-Foote, Wilton, CT – Letter to NAE – September 14, 2015
 Don Challes, Wilton, CT – Letter to NAE – September 14, 2015
 Matthew Corrigan, Wilton, CT – Letter to NAE – September 14, 2015
 Debbie Corrigan, Wilton, CT – Letter to NAE – September 14, 2015
 Kathryn Alonso, Wilton, CT – Letter to NAE – September 14, 2015
 Barbara Muher, CT – Letter to NAE – September 14, 2015
 Ken Morseon, Commack, NY – Letter to NAE – September 14, 2015
 Michelle Weiner, NY – Letter to NAE – September 14, 2015
 Lawrence Weiner, NY – Letter to NAE – September 14, 2015
 Mr. & Mrs. Lagomarsine, NY – Letter to NAE – September 14, 2015
 Jacqueline Amedo, Commack, NY – Letter to NAE – September 14, 2015
 P. DeMartino, Commack, NY – Letter to NAE – September 14, 2015
 Jeneane Rainey, NY – Letter to NAE – September 14, 2015
 Mrs. Barry, Hauppauge, NY – Letter to NAE – September 14, 2015
 Kate Mosley, Old Saybrook, CT – Letter to NAE – September 14, 2015
 Lynn Gamble, Smithtown, NY – Letter to NAE – September 14, 2015
 Kathleen Ayers Lanzillotta, Smithtown, NY – Letter to NAE – September 14, 2015
 Jeanne Loscialpo, Smithtown, NY – Letter to NAE – September 14, 2015
 Mary Mullaney, Bedford Hills, NY – Email to NAE – FW by CCE September 14, 2015
 Elizabeth Perrone, Mount Sinai, NY – Letter to NAE – September 13, 2015
 Wendy Henderson, Madison CT – Letter to NAE – September 12, 2015
 John Reilly, Mount Sinai, NY – Letter to NAE – September 12, 2015
 Ray A., NY – Letter to NAE – September 12, 2015
 Angela Hamberger, Farmingdale, NY – Letter to NAE – September 12, 2015
 Rosemary Culhane and Mary Werner, NY – Letter to NAE – September 12, 2015
 Marilyn LoPresti, East Marion, NY – Email to NAE – September 12, 2015
 Marie Price, West Haven, CT – Email to NAE – FW by CCE September 12, 2015
 Roberta Garlock, West Haven, CT – Email to NAE – FW by CCE September 12, 2015
 NAE – Response Letter to Senator Kristen Gillibrand – September 11, 2015
 NAE – Response Letter to Congressman Steve Isreal – September 11, 2015
 Joan and Chris Stollberger, Smithtown, NY – Letter to NAE – September 11, 2015
 Linda Forbes, Unionville, CT – Letter to NAE – September 11, 2015
 Bruce & Louise Beckwith, CT – Letter to NAE – September 11, 2015
 Jeannine Wulff, Unionville, CT – Letter to NAE – September 11, 2015
 Anne Boggett, CT – Letter to NAE – September 11, 2015
 Jean Cleary & Paul Dubrasky, Unionville, CT – Letter to NAE – September 11, 2015
 Eliza Douglass, Farmington, CT – Letter to NAE – September 11 2015
 Lynn Johnson-Corcoran, Unionville, CT – Letter to NAE – September 11, 2015
 David Neal, Unionville, CT – Letter to NAE – September 11, 2015
 Allyson & Edward Mooney, Unionville, CT – Letter to NAE – September 11, 2015
 Rocco Floccari, Smithtown, NY – Letter to NAE – September 11, 2015

Daniella Downing – Letter to NAE – September 11, 2015
 Justine Sullivan, Smithtown, NY – Letter to NAE – September 11, 2015
 Neal Richman, Smithtown, NY – Letter to NAE – September 11, 2015
 Terry Noto, Smithtown, NY – Letter to NAE – September 11, 2015
 Joseph Logan, Smithtown, NY – Letter to NAE – September 11, 2015
 John Downing, Smithtown, NY – Letter to NAE – September 11, 2015
 Alisa Downing, Smithtown, NY – Letter to NAE – September 11, 2015
 Marty Duchow & Deborah Taylor, Unionville, CT – Letter to NAE – September 11, 2015
 Ruth Cullen, Unionville, CT – Letter to NAE – September 11, 2015
 Sarah Huebner, Unionville, CT – Letter to NAE – September 11, 2015
 Milissa Campana, Smithtown, NY – Letter to NAE – September 11, 2015
 Lisa Bowen, Carle Place, NY – Email to NAE – FW by CCE September 11, 2015
 Barbara Newsheller, Farmington, CT – Letter to NAE – September 10, 2015
 Kuthware Family, Farmington, CT – Letter to NAE – September 10, 2015
 Baron Family, Farmington, CT – Letter to NAE – September 10, 2015
 Nicole Pittsley, Farmington, CT – Letter to NAE – September 10, 2015
 Krista Caro, Farmington, CT – Letter to NAE – September 10, 2015
 Anita Caro, Farmington, CT – Letter to NAE – September 10, 2015
 Cynthia Wilbur, Farmington, CT – Letter to NAE – September 10, 2015
 Patricia Duclos-Miller, Farmington, CT – Letter to NAE – September 10, 2015
 Wayne Miller, Farmington, CT – Letter to NAE – September 10, 2015
 David Harris, Farmington, CT – Letter to NAE – September 10, 2015
 Vicky Harris, Farmington, CT – Letter to NAE – September 10, 2015
 Jenifer Wogen, Farmington, CT – Letter to NAE – September 10, 2015
 Elizabeth Riordan, Aidan & Madeleine Flagg, CT – Letter to NAE – September 10, 2015
 Sharon Lynch, Farmington, CT – Letter to NAE – September 10, 2015
 Charles Ohannessian, Farmington, CT – Letter to NAE – September 10, 2015
 Allenie Gifford & Family, Farmington, CT – Letter to NAE – September 10, 2015
 Waite, Farmington, CT – Letter to NAE – September 10, 2015
 Sal Lombardo, Commack, NY – Letter to NAE – Forwarded September 10, 2015
 Elena Harubardjiev, Commack, NY – Letter to NAE – Forwarded September 10, 2015
 Edwin Pfeifer, Commack, NY – Letter to NAE – Forwarded September 10, 2015
 Bonnie Foti, NY – Letter to NAE – Forwarded September 10, 2015
 Seth Wallach, Smithtown, NY – Letter to NAE – Forwarded September 10, 2015
 Richard Meyer, Hauppauge, NY – Letter to NAE – Forwarded September 10, 2015
 Gary Green, Farmington, CT – Letter to NAE – September 10, 2015
 Jason Stange, Farmington, CT – Letter to NAE – September 10, 2015
 Sharlyn D’Occhio & Rachel Stets, Farmington, CT – Letter to NAE – September 10, 2015
 Susanna Stone, Middle Island, NY – Email to NAE – FW by CCE September 10, 2015
 Lorraine Carr, West Haven CT – Email to NAE – FW by CCE September 10, 2015
 Jessica O’Sullivan, Shoreham, NY – Email to NAE – FW by CCE September 10, 2015
 Kathryn Richardson, Norwalk, CT – Email to NAE – FW by CCE September 10, 2015
 James Moore, Farmington, CT – Letter to NAE – September 9, 2015
 Torres Family, Niantic, CT – Letter to NAE – September 9, 2015
 Barbara Gilbert, Niantic, CT – Letter to NAE – September 9, 2015
 Grace Catalano, Niantic, CT – Letter to NAE – September 9, 2015
 Dawn Bond, Niantic, CT – Letter to NAE – September 9, 2015

Laurie Corona, No Address – Letter to NAE – September 9, 2015
 Cheryl Colangelo, Niantic CT – Letter to NAE – September 9, 2015
 David Walters, Niantic CT – Letter to NAE – September 9, 2015
 Linda Raffa, Niantic, CT – Letter to NAE – September 9, 2015
 Frank, Prinszano, Hauppauge, NY – Letter to NAE – September 9, 2015
 Brenda Barrantes, Commack, NY – Letter to NAE – September 9, 2015
 Susan Rubins, Hauppauge, NY – Letter to NAE – September 9, 2015
 John DiGangi, Commack, NY – Letter to NAE – September 9, 2015
 Anna Lamia, Hauppauge, NY – Letter to NAE – September 9, 2015
 Barbara Reiss, Commack, NY – Letter to NAE – September 9, 2015
 Mary Dacey, Hauppauge, NY – Letter to NAE – September 9, 2015
 Carl & Marie Beck, Niantic, CT – Letter to NAE – September 9, 2015
 David Winston, Stamford, CT – Letter to NAE – September 9, 2015
 Melissa Corbett, Niantic, CT – Letter to NAE – September 9, 2015
 Leah Maragliano, Hauppauge, NY – Letter to NAE – September 9, 2015
 Maureen Bright, Huntington, NY – Letter to NAE – September 9, 2015
 William & Christine Scheer, Farmingdale, NY – Letter to NAE – September 9, 2015
 Suffolk County Legislators – Joint Letter to NAE – September 9, 2015
 M. Olness – Email to NAE – September 9, 2015
 Michael Liva – Email to NAE – September 9, 2015
 Ray Ramadon, West Haven, CT – Email to NAE – September 9, 2015
 Leslie Larson, Madison, CT – Email to NAE – September 9, 2015
 Lisa Carfora, West Haven, CT – Email to NAE – September 9, 2015
 Danial Nasim – Email to NAE – September 9, 2015
 Raabia Khan, Valley Stream, NY – Email to NAE – September 9, 2015
 Robert Schmidt, Farmingdale, NY – Email to NAE – September 9, 2015
 Dave Brown, Westport, CT – Email to NAE – September 9, 2015
 David Fis, Brookfield, CT – Email to NAE – September 9, 2015
 John Severini, Greenport, NY – Email to NAE – September 9, 2015
 Mary Masci, Cheshire, CT – Email to NAE – September 9, 2015
 Robin DeMominico, West Babylon, NY – Email to NAE – September 9, 2015
 Ivonne Levin – Email to NAE – September 9, 2015
 Maria and Thomas Ferro, Garden City, NY – Email to NAE – September 9, 2015
 Kit Hastings-Kort, Mansfield Center, CT – Email to NAE – September 9, 2015
 Peter Clournoy, Norwalk, CT – Email to NAE – September 9, 2015
 Kim Vicente, Westhampton, NY – Email to NAE – September 9, 2015
 Alissa Harrison, Fairfield, CT – Email to NAE – September 9, 2015
 Anne Russin, East Rockaway, NY – Email to NAE – September 9, 2015
 Denise Altobelli, Patchogue, NY – Email to NAE – September 9, 2015
 Gail Jensen, Farmington CT – Letter to NAE – September 8, 2015
 Illegible Name, Farmington CT – Letter to NAE – September 8, 2015
 Sound Beach Civic Association, NY – Letter to NAE – September 8, 2015
 Heather and Richard Ackerman, Bayport, NY – Email to NAE – September 8, 2015
 Rosemary Koepele, Huntington, NY – Email to NAE – September 5, 2015
 Bob Giordano, Huntington, NY – Letter to NAE – September 4, 2015
 Mark Donohue – Email to NAE – September 4, 2015
 Robin DeDominico, West Babylon, NY – Email to NAE – September 4, 2015

U.S. EPA Region I – Email to DMMP Steering Committee – September 3, 2015
 USACE-NAE – News Release and Public Notice on Additional Hearings – Sept 3, 2015
 Connecticut State Representative Kathleen McCarthy – Letter to NAE – September 3, 2015
 Jamie Spritzer, Roslyn Heights, NY – Email to NAE – September 3, 2015
 Sharon Jonas – Email to NAE – September 3, 2015
 Patricia and David Schecher, St. James, NY – Email to NAE – September 2, 2015
 Patrick Iannuccilli, Saint James, NY – Email to NAE – September 2, 2015
 Julianne Derken, Madison, CT – Email to NAE – September 2, 2015
 Connecticut Maritime Coalition – Letter to General Bostick – September 1, 2015
 Connecticut Congressional Delegation – Joint Letter to Chief of Engineers – Sept 1, 2015
 Brewer Deep River Marina, CT – Letter to NAE – September 1, 2015
 Rex Marine Center, Norwalk, CT – Letter to NAE – August 30, 2015
 Saybrook Point Inn and Spa, Old Saybrook, CT – Letter to NAE – August 28, 2015
 Louis Tagliatela, Jr., Wallingford, CT – Letter to NAE – August 28, 2015
 Patricia Tagliatela, North Haven, CT – Letter to NAE – August 28, 2015
 Steve Lopes, Southbury, CT – Letter to NAE – August 28, 2015
 Coral Paige, Fort Salonga, NY – Letter to NAE – August 28, 2015
 CT Office of Military Affairs – Statement Submitted at Public Hearing – August 27, 2015
 Thames River Properties, LLC, New London, CT – Letter to NAE – August 27, 2015
 Spicer’s Marinas, Noank, CT – Statement Submitted at Public Hearing – August 27, 2015
 Honorable Joseph Courtney, Member of Congress, CT – Statement Submitted at Public
 Hearing – August 27, 2015
 CT DEEP, Commissioner Klee – Statement Submitted at Public Hearing – August 26, 2015
 Petzold’s Marine Center, Portland, CT – Letter to NAE – August 26, 2015
 Brewer Yacht Yard at Mystic, CT – Letter to NAE – August 26, 2015
 Honorable Steve Israel, Member of Congress and the Honorable Kristen Gillibrand,
 United States Senate – Joint Letter to NAE – August 25, 2015
 New York State Assemblyman Fred W. Thiele, Jr. – Letter to NAE – August 25, 2015
 Suffolk County NY Legislator Sarah Anker – Letter to NAE – August 24, 2015
 Riverhead Town Councilwoman Jodi Giglio – Letter to NAE – August 24, 2015
 Town of Brookhaven, Anthony Graves, Statement Submitted at Public Hearing –
 August 24, 2015
 Paul Packer, Port Jefferson, NY – Email to NAE – August 24, 2015
 Barbara Rosenblum, Madison, CT – Email to NAE – August 22, 2015
 USACE NAE – New Release on Draft Comment Extension – August 21, 2015
 USACE-NAE – Letter to Congressman Lee M. Zeldin (NY-01) – August 21, 2015
 Debra Ann Venezia, Famingdale, NY – Email to NAE – August 21, 2015
 Jeff Plackis, Rockville, Centre, NY – Email to NAE – August 21, 2015
 Joan Caputo, Hartsdale, NY – Email to NAE – August 21, 2015
 Simone Pavlides – Email to NAE – August 21, 2015
 Constanze Dav – Email to NAE – August 20, 2015
 Josephine Winter, Wantagh, NY – Email to NAE – August 20, 2015
 Annie McClelland, Northport, NY – Email to NAE – August 20, 2015
 Richard Kobel, Wantagh, NY – Email to NAE – August 20, 2015
 Rachel Calemno, Easton, CT – Email to NAE – August 20, 2015
 Susan Oleshko, Deer Park, NY – Email to NAE – August 20, 2015

Frances McCarthy, Massapequa, NY – Email to NAE – August 20, 2015
Jamie Spritzer, Roslyn, NY – Email to NAE – August 20, 2015
Ann Aurelio, West Sayville, NY – Email to NAE – August 20, 2015
George Barker, White Plains, NY – Email to NAE – August 20, 2015
Keith Ragone, Walley Stream, NY – Email to NAE – August 20, 2015
Jolyne Kane, Orange, CT – Email to NAE – August 20, 2015
Lydia Silvas – Email to NAE – August 20, 2015
Heather Ackerman, Bayport, NY – Email to NAE – August 20, 2015
Richard Ackerman, Bayport, NY – Email to NAE – August 20, 2015
Erik Angiulo – Email to NAE – August 20, 2015
Lydia Hartmann, Smithtown, NY – Email to NAE – August 20, 2015
Brian Smith Tonawanda, NY – Email to NAE – Forwarded by CCE August 20, 2015
Marianne Makman, New Rochelle, NY – Email to NAE – August 20, 2015
Sharon Jonas – Email to NAE – August 20, 2015
Mary Wueste, Stony Brook, NY – Email to NAE – August 20, 2015
Scott Leipold, Mount Sinai, NY – Email to NAE – August 20, 2015
Rose Polis, Massapequa, NY – Email to NAE – August 20, 2015
Lawrence LaMarca, Huntington, NY – Email to NAE – August 20, 2015
Steve Prince and Pearl Lim, New Rochelle, NY – Email to NAE – August 20, 2015
Margaret Foster-Marks, Larchmont, NY – Email to NAE – August 20, 2015
Robert Biaggi – Email to NAE – August 20, 2015
Patricia Pace, Branford, CT – Email to NAE – August 20, 2015
Josephine Girardin, West Islip, NY – Email to NAE – August 20, 2015
Riverhead Town Councilwoman Jodi Giglio – Letter to NAE – August 20, 2015
Town of Huntington, NY – Letter to NAE – August 18, 2015
USACE-NAE – Email to PDT, RDT and TWG on Draft DMMP – August 17, 2015
USACE Public Notice – Draft Report and Hearings (Revised) – August 14, 2015
New York State Senator Kenneth P. LaValle – Letter to NAE – August 13, 2015
Group for the East End – Letter to NAE – August 11, 2015
Honorable Lee M. Zeldin, Member of Congress – Letter to NAE – August 10, 2015
Friends of the Bay – Letter to NAE – August 10, 2015
New York State Assemblywoman Michelle Schimel – Letter to NAE – August 10, 2015

Part 2B – Petitions Received during Review of the Draft DMMP/PEIS

Citizens Campaign for the Environment – Petition Forwarded by Email dated
October 16, 2015 (750 Signatures Dated October 6 to October 15, 2015)
David Carr Petition on Morris Cove – R. DeFonce Letter Submittal – October 15, 2015
Reach Out America, New York, NY – Email to NAE with Petition – October 14, 2015
Citizens Campaign for the Environment – Petition Received by Email (195 Unsigned Emails)
forwarded from the CCE Website Link and other Links – August 19 to October 8, 2015

Part 3 – Correspondence before Publication of the Draft DMMP/PEIS

USACE NAE – New Release on Draft DMMP/PEIS – August 14, 2015

NAE – Draft Report Transmittal Memo to NAD – August 14, 2015

NAE – Draft Report Transmittal Letters – August 12, 2015 (List)

Honorable Dannel P. Malloy, Governor of Connecticut

Honorable Andrew M. Cuomo, Governor of New York

Honorable Gina M. Raimondo, Governor of Rhode Island

Honorable Richard Blumenthal, United States Senator (CT)

Honorable Christopher Murphy, United States Senator (CT)

Honorable Charles E. Schumer, United States Senator (NY)

Honorable Kirsten E. Gillibrand, United States Senator (NY)

Honorable Jack Reed, United States Senator (RI)

Honorable Sheldon Whitehouse, United States Senator (RI)

Honorable John B. Larson, Representative in Congress (CT-1)

Honorable Joseph Courtney, Representative in Congress (CT-2)

Honorable Rosa L. DeLauro, Representative in Congress (CT-3)

Honorable James A. Himes, Representative in Congress (CT-4)

Honorable Elizabeth Esty, Representative in Congress (CT-5)

Honorable Lee M. Zeldin, Representative in Congress (NY-1)

Honorable Steven J. Israel, Representative in Congress (NY-3)

Honorable Joseph Crowley, Representative in Congress (NY-14)

Honorable Eliot L. Engel, Representative in Congress (NY-16)

Honorable Nita Lowey, Representative in Congress (NY-17)

Honorable James R. Langevin, Representative in Congress (RI)

Albert J. Krupski, Suffolk County Legislature – Letter to NAE – August 10, 2015

Manhasset Bay Protection Committee – Letter to NAE – August 7, 2015

Wading River Civic Association – Letter to NAE – August 6, 2015

North Fork Environmental Council – Letter to NAE – August 6, 2015

Hempstead Harbor Protection Committee – Letter to NAE – August 6, 2015

Kara Hahn, Suffolk County Legislature – Letter to NAE – August 5, 2015

Citizens Campaign for the Environment – Letter to NAE – August 4, 2015

USACE NAE – New Release on Draft DMMP/PEIS – July 27, 2015

CTDEEP – Email with Comments on Agency Draft DMMP-PEIS – July 24, 2015

NYDOS – Joint Letter with NYDEC to NAE – July 24, 2015 – PEIS Comments

NYDOS – Email to NAE – July 24, 2015 – DMMP CZM Program Comments

USACE NAE – Public Notice on release of the Draft DMMP-PEIS – July 23, 2015

NMFS – Email Comments on Agency Draft DMMP/PEIS – July 22, 2015

RI-CRMC – Email Comments on Agency Draft DMMP/PEIS – July 10, 2015

NYDOS – Joint Letter with NYDEC to NAE – July 10, 2015 – DMMP Comments

With 29 July List of References forwarded by EMail

U.S. EPA, Regions I & II – Email Comments on Draft DMMP/PEIS – July 10, 2015
 USACE NAE – Seven Letters to LIS DMMP PDT Agencies on ATR - June 2, 2015
 U.S. EPA, Region I – Second Site Extension Letter – April 28, 2015
 U.S. EPA, Region I – Site Extension Letter – June 10, 2013
 U.S. EPA, Region I – Cooperating Agency Letter to USACE-NAE – June 8, 2012
 U.S. EPA, Region I – Letter to CT DEEP – June 7, 2012
 U.S. EPA, Region I – Letter to U.S. Navy Region North Atlantic – February 21, 2012
 U.S. EPA, Region I – Letter to U.S. Navy Region North Atlantic – December 5, 2011
 U.S. Navy Region North Atlantic – Letter to U.S. EPA, Region I – November 4, 2011
 Connecticut Harbor Management Association – Letter to USACE NAE – May 25, 2011
 Connecticut Harbor Management Association – Letter to USACE NAE – May 12, 2011
 USACE NAE – Letter to Connecticut Harbor Management Association – April 21, 2011
 Connecticut Harbor Management Association – Letter to USACE NAE – April 15, 2011
 CT DEP – Letter to U.S. EPA Administrator – March 23, 2011
 U.S. EPA – Letter to CT Congressional Delegation – February 26, 2010
 U.S. EPA – Letter to CT DEP on Eastern LIS SEIS & DMMP – January 22, 2010
 Connecticut Congressional Delegation – Joint Letter to U.S. EPA – December 4, 2009
 Connecticut Governor Rell – Letter to Senator Lieberman – November 17, 2009
 NY Department of State – CZM Consistency Denial to U.S. Navy – November 2, 2009
 U.S. EPA, Region I – Letter to CT DEP – October 6, 2009
 Suffolk County DPW – Letter to NY DOS with Dredging Records – August 12, 2009
 U.S. EPA, Region I – Memorandum to USACE-NAE – May 12, 2009
 Connecticut Attorney General – Letter to CT Maritime Commission – December 16, 2008
 CT Maritime Commission – Letter to CT Attorney General – February 13, 2008
 USACE New York District – Letter to Brittny Quinn – February 8, 2008
 USACE NAE – Letter to U.S. EPA Region I - January 16, 2008
 U.S. Coast Guard, Sector LIS – Letter to USACE-NAN – Undated December 2007 –
 Enclosing Letter from Ms. Brittny Quinn, Glen Head, NY, November 14, 2007
 Suffolk County (NY) Department of Environment and Energy – Statement to Scoping
 Meeting – November 27, 2007
 Clean Harbor Action – Statement to Scoping Meeting – November 26, 2007
 Congresswoman Nita Lowey (NY) – Statement to Scoping Meeting – November 26, 2007
 Joint USACE-USEP Public Notice of DMMP/PEIS Scoping Meetings – November 2007
 Ocean and Coastal Consultants – Letter to NAN – November 9, 2007
 Federal Register Notice of Intent to Prepare Draft PEIS on LIS DMMP – August 31, 2007
 LIS Regional Dredging Team Charter – May 28, 2007
 USACE New York District – Letter to Senator Clinton – May 2, 2007
 Senator Clinton – Letter to USACE-NAN – April 5, 2007
 CT Maritime Commission – Letter to CT Attorney General – November 8, 2006
 USACE-NAD – Memorandum to NAE Approving PA – June 21, 2006
 New York Governor Pataki Letter to Senate Appropriations Committee – May 9, 2006

New York Governor Pataki Letter to House Appropriations Committee – May 9, 2006
 Connecticut Harbor Management Association – Letter to NAE – March 21, 2005
 USACE Director of Civil Works –Letter to CT Governor Rell – March 17, 2005
 USACE Director of Civil Works –Letter to NY Governor Pataki – March 17, 2005
 USACE-NAE – MFR on January 11, 2005 PDT Meeting – February 22, 2005
 Governors of Connecticut and New York – Letter to USACE – February 8, 2005
 USACE-NAE – Meeting Summary – September 2, 2004 Meeting – October 13, 2004
 USACE-NAE – Meeting Summary – December 8, 2004 Meeting – December 20, 2004

Part 4 – Public Hearings during Review of the Draft DMMP/PEIS with Hearing Materials and Transcripts

Public Hearings Summary Report, Process, Materials and Testimony
 Public Hearing Transcripts and Statements

Port Jefferson, NY	Village Center	August 24, 2015
Uniondale, NY	Long Island Marriott	August 25, 2015
Stamford, CT	Univ. of Connecticut	August 26, 2015
New London, CT	Holiday Inn	August 27, 2015
Riverhead, NY	Hotel Indigo	September 16, 2015
New Haven, CT	Omni Hotel	September 17, 2015

Part 5 – Long Island Sound DMMP Project Newsletters

Final Newsletter – April 2014
 Second Newsletter – August 2012
 First Newsletter – January 2010

Part 6 – List of Letters and Emails Received after the October 16, 2015 Close of the Public Comment Period

APPENDIX A PUBLIC INVOLVEMENT AND PERTINENT CORRESPONDENCE

Public Involvement Plan and Coordination for the Long Island Sound Dredged Material Management Plan and PEIS

The basic framework for the development of the DMMP/PEIS, including the process for public involvement, was negotiated and agreed upon as part of the settlement agreement between the agencies and states leading to EPA site designation rule in 2005. These discussions began with the 2004 publication of EPA's FEIS to designate the Central and Western Long Island Sound sites. EPA's final rule required preparation of a LIS DMMP tied to a future decision on extension, permanent designation or closure of those sites. The study to develop the DMMP was a cooperative effort between the Federal government and the states of Connecticut and New York. The two states and the principal Federal agencies involved in the study each appointed representatives to a Steering Committee to provide overall direction and management of the study, and a Project Delivery Team (PDT) to prepare the DMMP and accompanying PEIS. The public involvement process for the LIS DMMP/PEIS included the following major elements:

- Establishing an interagency interstate Project Delivery Team to develop the study scope, budget estimates, and timeline, to define and coordinate study tasks, review study products, collect and disseminate information from their respective agencies to the broader team.
- Formation of an interagency interstate Steering Committee to oversee the activities of the PDT, guide the overall study process and progress, support the budget estimates, and resolve issues raised by the PDT.
- Holding a series of DMMP/PEIS scoping sessions in Connecticut and New York to engage and inform the public of the DMMP/PEIS purpose and need, and to solicit public comment and input to the final scope of study.
- Establishing a Public Working Group to assist the PDT in developing study tasks and tools, including the dredging/placement cost estimating tool, the placement alternatives impact ranking and screening process, and review of study products.
- A survey of Federal, State and local agencies, terminal operators, and other public and private waterfront facilities was conducted to update the dredging needs assessment, collect data on dredging material volumes and classification, assemble initial inventory of past and present placement alternatives, and prepare the anticipated dredging needs timeline.
- Outreach to State, County and local officials by the USACE and its contractors during preparation of the dredged material placement sites alternatives inventory and evaluation.
- Informing the public of the study's progress through newsletters disseminated through agency websites and the member organizations of the Public Working Group.

- Review of an advance draft of the DMMP/PEIS by an Agency Technical Review Team, the Project Delivery Team and the Steering Committee, followed by preparation of a public review draft.
- Public hearings on the draft DMMP/PEIS were held in both New York and Connecticut after completion of internal and PDT reviews.

The final rule designating the Central and Western Long Island Sound sites also required formation of an interagency/interstate Regional Dredging Team (RDT) for Long Island Sound which would engage agencies and private parties looking to secure approvals for dredging projects in the LIS region that were subject to MPRSA requirements. Agencies and proponents of such projects would present the findings of their placement alternatives analysis and seek input from the RDT to be considered in their final applications and requests for approvals from Federal and state regulatory agencies. The RDT would also produce an Annual Report on the progress of the DMMP, including dredging and placement activities in the Long Island region, to track the progress in finding and implementing alternatives to open water placement. EPA Region I has prepared the annual reports, as listed below, since 2006.

U.S. EPA Annual Reports Regarding Progress in Developing a Dredged Material Management Plan for the Long Island Sound Region		
Annual Report	Date	Period Covered
Ninth	May 2015	July 6, 2013 to July 5, 2014
Eighth	February 2014	July 6, 2012 to July 5, 2013
Seventh	January 2013	July 6, 2011 to July 5, 2012
Sixth	December 2011	July 6, 2010 to July 5, 2011
Fifth	December 2010	July 6, 2009 to July 5, 2010
Fourth	October 2009	July 6, 2008 to July 5, 2009
Third	October 2008	July 6, 2007 to July 5, 2008
Second	December 2007	July 6, 2006 to July 5, 2007
First	September 1, 2006	July 5, 2005 to July 5, 2006

Public Information and Scoping Session

As part of the environmental impact statement (EIS) process, the National Environmental Policy Act (NEPA) requires that there be an early and open process with the public regarding the proposed action for which an EIS will be prepared. The purpose of this public involvement process is to obtain input from private citizens, citizen groups, public interest groups, organizations, businesses, and Federal, state, and local agencies on issues to be discussed in the EIS.

The PDT's public involvement strategy includes stakeholders with an interest in the Long Island Sound. These stakeholders include Federal, state, county, and municipal agencies, tribes, universities, interested non-governmental groups (including environmental organizations and marine trades groups), citizens groups, and individuals. These

organizations and individuals will be notified of public meetings or workshops, as well as periodic progress reports on the development of the PEIS and DMMP.

The first public involvement step for the LIS DMMP was the publication of a Notice of Intent in the Federal Register on August 31, 2007. The Notice of Intent listed the agencies involved, the proposed action, a summary of the expected content of the draft PEIS and LIS DMMP, notification of upcoming public scoping meetings, and contact information for further information. The public scoping meetings were held in six sessions, three each in Connecticut and New York between November 26 and 29, 2007, after notice to the public. Presentations were made by the Corps, EPA and Connecticut and New York state agencies on the purpose and need for the DMMP/PEIS, the study process and scope, and the range of alternatives to be considered. Written and verbal public comments were received and the meetings were recorded by stenographer. The summary document for these meetings is included in the Technical Supporting Documents.

Public Information and Scoping Meetings Long Island Sound Dredged Material Management Plan	
Meeting Date	Location
November 29, 2007	New London, CT
November 29, 2007	New Haven, CT
November 28, 2007	Stamford, CT
November 27, 2007	Port Jefferson, NY
November 27, 2007	Carle Place, NY
November 26, 2007	New Rochelle, NY

Long Island Sound DMMP Project Delivery Team

Each of the states and the principal Federal agencies involved in the study appointed staff to the Project Delivery Team. The PDT was tasked with the scoping and management of the study, preparing budget estimates and contract scopes for the study tasks, preparation and review of technical products, and ensuring that other stakeholders were involved in the study process, and collecting and disseminating information from their respective agencies to the broader team. The state of Rhode Island was also asked to participate as the DMMP/PEIS study region included Block Island Sound and that state's southwestern shore.

The Project Delivery Team is composed of the following Federal and state agencies:

- U.S. Army Corps of Engineers – North Atlantic Division (NAD)
- U.S. Army Corps of Engineers – New England District (NAE)
- U.S. Army Corps of Engineers – New York District (NAN)
- U.S. Environmental Protection Agency – Region I (New England)
- U.S. Environmental Protection Agency – Region II
- National Marine Fisheries Service
- Connecticut Department of Energy and Environmental Protection
- Connecticut Department of Transportation - Maritime
- New York Department of State

- New York Department of Environmental Conservation
- The Rhode Island Coastal Resources Management Council

The LIS DMMP PDT generally meets once monthly by conference call, with in-person meetings twice annually. Minutes of each meeting are prepared and circulated to the PDT. PDT meetings are generally not held in months when a Steering Committee meeting or Working Group meeting is held, as the PDT has had an opportunity to confer in those forums.

LIS DMMP Steering Committee

The two states and the principal Federal agencies involved in the study and represented on the PDT each appointed senior representatives to a Steering Committee to provide overall direction and management of the study, coordinate budgeting and study funding, and maintain the necessary contacts to ensure continued legislative support for the DMMP/PEIS.

The Steering Committee is composed of the following Federal and state agencies:

- U.S. Army Corps of Engineers – North Atlantic Division (NAD)
- U.S. Army Corps of Engineers – New England District (NAE)
- U.S. Army Corps of Engineers – New York District (NAN)
- U.S. Environmental Protection Agency – Region I (New England)
- U.S. Environmental Protection Agency – Region II
- National Marine Fisheries Service
- Connecticut Department of Energy and Environmental Protection
- New York Department of State
- New York Department of Environmental Conservation
- Rhode Island Coastal Resources Management Council

The senior staff of the agencies composing the Steering Committee first met after EPA's 2004 publication of the site designation FEIS for the CLDS and WLDS to cooperatively develop the language in the June 2005 Final Rule, and the first outlines of the scope of the eventual DMMP. These meetings were held as follows:

October 13, 2004	NY DOS Offices, Albany, NY
December 20, 2004	NY DOS Offices, Albany, NY
March 21, 2005	MA DEP Offices, Springfield, MA
November 30, 2005	NMFS Offices, Milford, CT

The following are dates of steering committee meetings held since the DMMP was initiated:

January 11, 2006	CT DMF, Old Lyme, CT
March 14, 2006	Conference Call
December 21, 2009	CT DOT Newington, CT
February 8, 2010	CT DOT Newington, CT
May 13, 2010	Conference Call
November 18, 2010	Conference Call
February 10, 2011	CT DOT Newington, CT
February 8, 2012	CT DOT Newington, CT

August 9, 2012	Conference Call
May 10, 2012	Conference Call
February 19, 2013	CT DOT Newington, CT
May 28, 2013	Conference Call
August 15, 2013	Conference Call
February 11, 2014	CT DOT Newington, CT
October 8, 2014	Conference Call
March 11, 2015	Westover AFB, MA

LIS DMMP Public Working Group

The members of the LIS DMMP PDT hosted a series of Working Group meetings as part of the process to assess dredged material management alternatives in the study area. This evaluation process was aimed at establishing a list of evaluation criteria based on stakeholder interests and concerns. Members of the Working Group, by reviewing and disseminating the information presented and discussed at the meetings, and relaying back their organization's comments and positions, served as a communication link between the regulatory agencies and the organizations that Working Group members represent. The meetings were arranged using an open forum. The following agencies and groups participated in the LIS DMMP Working Group.

Connecticut Maritime Commission	Connecticut Pilots Commission
Connecticut Marine Trades Association	Connecticut Maritime Coalition
Long Island Sound Councils and Assembly	CT Department of Transportation
Long Island Sound Lobstermen's Association	CT Dept. of Agriculture, Division of Aquaculture
Connecticut Charter Party Boat Association	Audubon Society New York
Audubon Society Connecticut	U.S. Navy (Groton)
Connecticut Harbor Management Association	Housatonic Valley Association
U.S. Coast Guard (MSO-LIS New Haven)	The Nature Conservancy
Citizen's Campaign for the Environment	Pfizer
Long Island Sound Study Citizens Advisory Committee, CT	Connecticut Commercial Lobstermen's Association
Long Island Sound Study Citizens Advisory Committee, NY	New York Coalition for Recreational Fishing
Connecticut Fund for the Environment / Save the Sound	West End Long Island Sound Lobstermen's Association
Connecticut River Watershed Council	New York Marine Trades
Fishers Island Conservancy	New London Port Authority
Rivers Alliance of Connecticut	New Haven Port Authority
Surfriders - Connecticut	Bridgeport Port Authority
Surfriders - Eastern Long Island Sound	Norwalk Maritime Authority

The Working Group members reviewed the results of technical studies of alternatives, dredging needs, and economic and cultural impacts. The Working Group members were engaged in developing a list of evaluation criteria based on interests and concerns of their organizations. The evaluation criteria were used in a multi-criteria decision making process based on technical evaluations of the screened alternatives. The results were considered in the development of the placement alternatives screening process during preparation of the PEIS. Those results in turn were used to narrow the final array of alternatives assessed for each FNP and other Federal agency project screened for cost practicability.

Multi-Criteria Decision Analysis Process

- Step 1 – Develop alternatives screening criteria based on input from the stakeholders focused on what they value, and what their concerns are. The criteria for the evaluation of dredged material management were categorized in four broad groups: Environmental Media, Ecological Receptors, Human Welfare, and Economics. Impacts of concern were identified for each category (e.g. cost, fish stocks, access).
- Step 2 – Develop decision model sub-criteria and metrics (how to measure impact). Create a structure for sub criteria and metrics for each alternative, and report back to the Working Group with the results.
- Step 3 – Assess the values placed by the Working Group members (stakeholders) on the criteria through interview, and group those values by categories
- Step 4 – Develop metrics for the impacts of concern for each alternative (e.g. the impact on fish from nearshore placement)
- Step 5 – Run the model to prioritize alternatives based on stakeholder values, and present the results to the stakeholders for response.

The LIS DMMP Working Group met five times between March 29, 2011 and January 17, 2013.

Technical Working Group Meetings Long Island Sound Dredged Material Management Plan	
Meeting Date	Location
January 17, 2013	Bridgeport, CT
October 30, 2012	Bridgeport, CT
October 6, 2011	Port Jefferson, NY
June 7, 2011	Bridgeport, CT
April 26, 2011	Port Jefferson, NY
March 29, 2011	Bridgeport, CT

In the first Working Group meeting the results of studies conducted to date and the multi-criteria decision analysis model being prepared by ERDC were discussed. Discussions at the second Working Group meeting included background on the DMMP, the current process for determination of suitability of dredged material for placement, and the approach to the multi-criteria decision analysis that was being conducted. At the third Working Group meeting topics included discussion of group members' worksheet responses on impacts and concerns, updated criteria and sub-criteria, and case studies. At the fourth Working Group meeting

activities focused on finalizing evaluation metrics, classification of alternatives for the multi-criteria decision analysis, preparation of the stakeholder interview process, and the review of the technical assessment process for alternatives. The fifth and final Working Group meeting included a DMMP process update, a summary and discussion of the multi-criteria decision analysis stakeholder interview results, and review of the multi-criteria decision analysis process.

LIS Regional Dredging Team

The LIS RDT Charter (included in Part 3 of this Appendix) became effective on May 28, 2007. The LIS RDT was established pursuant to the EPA final rule designating the CLDS and WLDS. The LIS RDT meets whenever a dredging project in the LIS region to which MPRSA applies (all Federal agencies projects, plus all non-Federal projects greater than 25,000 CY) is proposed which is considering open water placement of dredged material. As these types and sizes of projects are infrequent, the LIS RDT generally only meets a few times a year. The LIS RDT is composed of the same agencies represented on the LIS DMMP PDT.

New England Regional Dredging Team

The New England Regional Dredging Team (NERDT), also known as the Sudbury Group (after its original meeting place at the Great Meadows National Wildlife Refuge headquarters in Sudbury, Massachusetts) is one of the Nation's oldest interagency/interstate dredging teams, composed of representatives from Federal agency offices in New England, and the agencies of the several New England coastal states and New York, with authority over or interest in dredging and other coastal infrastructure projects and dredged material placement in the region. The NERDT has established four State Dredging Teams (Rhode Island, Massachusetts, New Hampshire and Maine), and one Long Island Sound Regional Dredging Team. The individual state dredging teams include a more focused representation of local groups, state agencies and private interests than the NERDT. Many of these participants are primarily interested in very localized issues. There are also working groups established around individual dredging projects, especially those involving larger harbors in the region, such as Boston or Providence. The NERDT generally meets three to four times a year and is briefed on the progress, issues and concerns with all major studies and projects, including the LIS DMMP.

Other Agency Coordination and Briefings

At the request of the Governor of Connecticut and that state's Congressional delegation, a briefing was given by the USACE, U.S. EPA and CT DOT to the Governor and delegation staff on October 17, 2007. The LIS DMMP process and progress were also briefed to the Connecticut Maritime Commission at the following meetings of that body:

June 19, 2007
February 18, 2009
March 21, 2011

Project Newsletters

Three project newsletters were published during the course of the DMMP as listed below, and were distributed to the PDT, working group and the wider public mailing list.

January 2010

August 2012

April 2014

Public Notice, Meetings and Hearings on the Draft DMMP/PEIS

A Public Notice on the availability of the Draft LIS DMMP/PEIS for public review and the scheduled public hearing in NY and CT was issued by the USACE-NAE on July 24, 2015. The public comment period on the draft DMMP-PEIS was initially 30 days, from August 17 to September 18, 2015. Members of the public requested a longer review period, with many calling for 120 days. A revised public notice, extending the review period to October 5, 2015, was issued on August 14, 2015. A further revised public notice extending the comment period to October 16, 2015, for a total of 60 days, and announcing two additional public hearings in New York and Connecticut, was issued on September 3, 2015.

Specific notice of availability and review of the draft DMMP/PEIS was also made through letters to the governors of the three states in the study area and their Congressional delegations on August 12, 2015. Specific notices included a copy of the subject draft documents on compact disk. Notice was made to the several Federal and state agencies represented on the PDT, and to the Working Group participants, by email on August 17, 2015. The public notices included instructions for downloading the draft documents from the New England District public website once they were posted on August 17, 2015. Public hearings on the draft DMMP and PEIS were held as shown below. The last two hearings in September included question and answer sessions after the hearings were closed, but still on the record.

Public Hearings on Long Island Sound Draft Dredged Material Management Plan and Draft Programmatic Environmental Impact Statement				
Meeting Date	Location	Venue	Number Attending	Number Speaking
August 24, 2015	Port Jefferson, NY	Village Center	52	23
August 25, 2015	Uniondale, NY	Long Island Marriott	12	1
August 26, 2015	Stamford, CT	Univ. of Connecticut	30	8
August 27, 2015	New London, CT	Holiday Inn	62	25
September 16, 2015	Riverhead, NY	Hotel Indigo	42	12
September 17, 2015	New Haven, CT	Omni Hotel	54	25

The public comment period on the draft DMMP-PEIS closed on October 16, 2015.

Public and Agency Review Comments on the Draft DMMP/PEIS

Copies of correspondence received during the public review period, and written statements submitted at the public hearings are included in Part 2A of this appendix. Petitions received by USACE during the review period, either in writing or by email are included in Part 2B of this Appendix. A summary report on the public hearings, including the transcripts of each are included in part 4 of this Appendix.

All letters received were organized in the chronological order in which they were dated or postmarked and are listed above. Many of the letters received, particularly those forwarded by interest groups, were undated, and or handwritten. Names and addresses were often illegible. Undated letters were annotated with the postmark date, or with the forwarding party name and the postmark date on the package they were enclosed in. When signatures and names were illegible, an attempt was made to discern the author's initials, municipality or state of origin.

Responses to the comments received were drafted in response to both general and thematic comments made by multiple parties which could be answered by a general response applicable to all comments, and responses to more specific comments made on particular points. In addition responses were made to comments received at the public hearings as documented in the transcripts. The three sections and comment/response tables below provide the General, Specific and Public Hearing responses.

Readers looking for responses to the comments, or for particular comments and responses, are advised to take the following steps:

- (1) First read the general comments and responses in Table A-1
- (2) Second, look at the list below of specifically responded to letters, and find the comments and responses for that letter in Table A-2. If looking for responses to comments made at a public hearing please look in Table A-3.
- (3) If a particular letter of interest is not included in the Specific Response table, then that letter is covered by the General Responses.

General Responses to Correspondence Received

Comments of a general nature, and those raised by multiple commenters are summarized in this section, with the responses to each general comment topic and subject are shown Table A-1. Of the more than 1,800 letters, emails and statements received, more than 1,700 are covered by the General Responses. Topics included in the General Responses (with the topic number for reference to the table) are as follows:

- 0002R Environmental Degradation/Consequences and Economic Cost of Open-Water Placement
- 0003R Public Involvement Process-NEPA
- 0004R Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives
- 0005R Sediment Contamination and Dredged Material Sampling and Testing
- 0006R Dredging Needs and Economy, and No Action Alternative
- 0008R Confined Aquatic Disposal Cell Development

0008R Sediment Reduction Efforts
 0015R Long Island Sound as an Estuary of National Significance
 0027R Federal Base Plan Development and Availability of Alternatives to Open Water Placement
 0031R Hypoxia and Nutrients
 0033R Long Island Sound Protection Efforts
 0041R Availability of Open-Water Alternatives
 0042R DMMP Goal to Eliminate or Reduce Open-Water Placement or Phase Out Open Water Placement
 0072R Consideration of Mine Reclamation Alternatives
 0073R Confined Disposal Facilities as Alternatives
 0074R Adequacy of Agency and Stakeholder Coordination
 0076R Cost of Beneficial Use Alternatives
 0077R Navigational Safety
 0084R Benefits of and Value Assigned to Beneficial Use Alternatives
 0085R Upland Placement Alternatives for Dredged Material
 0148R Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor
 0151R Cumulative Impacts
 0153R Nitrogen Loading
 0154R Placing of Dredged Material in the Aquatic Environment, Resuspension and Migration of Sediment
 0203R LIS Lobster Population Decline and Impacts
 0302R Site Management and Monitoring Plans (SMMPs) for Open Water Placement Sites

Specific Responses to Correspondence Received

In addition to commonly raised issues and comments, agencies and individual commenters often raise specific comments and questions on a variety of topics and concerns. These comments are discussed and summarized and responses provided in this section. The comments and responses are provided in Table A-2. Copies of that correspondence are also included in Part 2A of this appendix.

Specific responses to correspondence are organized in the following order:

- Congressional Interests and Governors
- Federal Agencies and Officials
- State Agencies and State Elected Officials
- County and Municipal Agencies and Elected Officials
- Port Authorities
- Regional Commissions and Chambers
- Non-Governmental Organizations and Interest Groups
- Private Businesses and Individuals

Responses to some comments refer the reader to the General Responses given in the section above, while more specific comments have specific responses. A list of 132 specifically responded to letters is as follows:

Congressional Interests and Governors (5)

Honorable Dannel P. Malloy, Governor, CT – Letter to Lt General Bostick – Sept 18, 2015
Connecticut Congressional Delegation – Joint Letter to Chief of Engineers – Sept 1, 2015
Honorable Joe Courtney, Member of Congress – Public Hearing Statement – August 27, 2015
Honorable Steve Israel, Member of Congress and the Honorable Kristen Gillibrand,
United States Senate – Joint Letter to NAE – August 25, 2015
Honorable Lee M. Zeldin, Member of Congress – Letter to NAE – August 10, 2015

Federal Agencies (3)

U.S. Environmental Protection Agency, Region I – Letter to NAE – October 16, 2015
U.S. Naval Submarine Base New London, CT – Letter to NAE – October 9, 2015
U.S. Coast Guard, Sector NY – Letter to NAE – September 29, 2015

State Politicians and State Agencies (13)

NY Departments of State & Environmental Conservation – Joint Letter to NAE – Oct 16, 2015
NY Departments of State & Environmental Conservation – Joint Letter to NAE – Oct 9, 2015
Connecticut General Assembly – Joint Letter (39) to General Bostick – October 1, 2015
State Representative Fred Camillo, Greenwich, CT – Email to NAE – September 30, 2015
NY State Parks, SHPO – Emails to NAE – September 28-30, 2015
CT Office of Policy & Management – Statement Submitted at Public Hearing – 17 Sept 2015
New York State Assemblyman Steven Englebright.– Letter to NAE – September 16, 2015
Connecticut State Representative Kathleen McCarthy – Letter to NAE – September 3, 2015
CT Office of Military Affairs – Statement Submitted at Public Hearing – August 27, 2015
CT DEEP, Commissioner Klee – Statement Submitted at Public Hearing – August 26, 2015
New York State Assemblyman Fred W. Thiele, Jr. – Letter to NAE – August 25, 2015
New York State Senator Kenneth P. LaValle – Letter to NAE – August 13, 2015
New York State Assemblywoman Michelle Schimel – Letter to NAE – August 10, 2015

County and Municipal Politicians and Agencies (37)

Town of North Hempstead, NY – Letter to NAE – October 16, 2015
Town of Oyster Bay, NY – Letter to NAE – October 16, 2015
Town of Greenwich, CT, Dept of Parks and Recreation – Letter to NAE – October 15, 2015
Town of Greenwich, CT, Shellfish Commission – Letter to NAE – October 15, 2015
Town of Guilford, CT, Marina Commission – Letter to NAE – October 13, 2015
Town of East Lyme, CT, Harbor Management & Shellfish Commission Letter to NAE –
October 10, 2015
Nassau County Legislator Delia DeRiggi-Whitton, NY – Letter to NAE – October 8, 2015
Town of Greenwich, Police Dept (James Heavy, Chief) – Letter to NAE – October 8, 2015
Town of Guilford, CT, Marina Commission (Roger Celesk) – Email to NAE – Oct 7, 2015
Suffolk County Planning Commission, NY – Letter to NAE – October 7, 2015
Town of Southold, NY – 2 Letter to NAE – October 5, 2015
Town of Smithtown, NY – Letter to NAE – October 2, 2015
Greenwich Harbor Mgmt Comm’n (Bernard Armstrong), CT – Letter to NAE – Oct 1, 2015
Town of Old Lyme, CT, First Selectwoman – Letter to NAE – September 30, 2015
Town of Groton, CT, Mayor and Town Manager – Letter to NAE – September 30, 2015

Old Lyme Harbor Management Commission (Farman) – Email to NAE – September 29, 2015
 Town of Essex, CT, First Selectman – Letter to NAE – September 28, 2015
 Town of Sprague, CT, First Selectman – Letter to NAE – September 28, 2015
 Harbor Management Commission, Town of Essex, CT – Letter to NAE – September 25, 2015
 City of Norwich, CT, Mayor Deberey Hinchey – Letter to NAE – September 24, 2015
 City of New London, Fire Dept (Henry Kidd, Jr., Chief) – Letter to NAE – Sept 24, 2015
 Town of Guilford, CT, Harbor Management Commission – Email to NAE – Sept 23, 2015
 Town of East Lyme, CT, First Selectman– Letter to NAE – September 23, 2015
 Michael E. Passero, New London City Council, CT – Letter to NAE – September 23, 2015
 Town of Waterford, CT – Letter to NAE – September 23, 2015
 Town of Greenwich, CT, DPW (Amy Siebert) – Email to NAE – September 22, 2015
 City of New Haven, CT, Harbormaster (John Izzo) – Letter to NAE – Sept 22, 2015
 Town of East Lyme, CT, Harbormaster, – Letter to NAE – September 22, 2015
 Mayor Marian Galbraith, City of Groton, CT – Letter to NAE – September 22, 2015
 Mayor John A. Rodolico, Town of Ledyard, CT – Letter to NAE – September 22, 2015
 City of New Haven, Planning Department – Letter to NAE – September 21, 2015
 Suffolk County Legislators – Joint Letter to NAE – September 9, 2015
 Suffolk County NY Legislator Sarah Anker – Letter to NAE – August 24, 2015
 Riverhead Town Councilwoman Jodi Giglio – Letter to NAE – August 24, 2015
 Town of Brookhaven, Anthony Graves, Public Hearing Statement – August 24, 2015
 Riverhead Town Councilwoman Jodi Giglio – Letter to NAE – August 20, 2015
 Town of Huntington, NY – Letter to NAE – August 18, 2015

Port Authorities (2)

New London Port Authority, CT – Letter to NAE – September 25, 2015
 New Haven Port Authority, CT – Letter to NAE – September 24, 2015

Regional Commissions and Chambers (10)

Manhasset Bay Protection Committee – Letter to NAE – October 13, 2015
 Hempstead Harbor Protection Committee, NY – Letter to NAE – October 8, 2015
 Mattituck-Laurel Civic Association, Mattituck, NY – Letter to NAE – Oct 1, 2015
 Old Saybrook Chamber of Commerce, CT – Letter to NAE – September 30, 2015
 Middlesex County Chamber of Commerce, CT – Letter to NAE – September 28, 2015
 Greater Mystic Chamber of Commerce, CT – Letter to NAE – September 22, 2015
 Southeastern Connecticut Council of Governments – Letter to NAE – September 18, 2015
 Connecticut Council of Small Towns – Letter to NAE – September 17, 2015
 Peconic Estuary Program CEC – Letter to NAE – Postmarked September 16, 2015
 Southeastern Connecticut Enterprise Region, Groton, CT – Letter to NAE – August 26, 2015

Non-Governmental Organizations and Interest Groups (11)

Connecticut Fund for the Environment/Save the Sound – Letter to NAE – October 16, 2015
 Connecticut Harbor Management Association – Letter to NAE – October 15, 2015
 North Fork Environmental Council, Mattituck, NY – Letter to NAE – October 15, 2015
 Citizens Campaign for the Environment, Farmington, NY – Email to NAE – Oct 14, 2015
 Group for the East End, Southold, NY – Letter to NAE – October 12, 2015

Groton Business Association, Mystic, CT – Letter to NAE – September 21, 2015
Wading River Civic Association, NY – Letter to NAE – September 15, 2015
Sound Beach Civic Association, NY – Letter to NAE – September 8, 2015
Connecticut Maritime Coalition – Letter to General Bostick – September 1, 2015
Group for the East End – Letter to NAE – August 11, 2015
Friends of the Bay – Letter to NAE – August 10, 2015

Private Businesses and Individuals (41)

General Dynamics, Electric Boat, Groton, CT – Letter to NAE – October 14, 2015
Tim Visel, Ivoryton, CT – Letter to NAE – October 14, 2015
Emily May, Lloyd Harbor, NY – Letter to NAE – October 14, 2015
Brewer Yacht Yard Group, Warwick, RI – Letter to NAE – October 13, 2015
John Cox, New Haven, CT – Letter to NAE – October 12, 2015
Sound Beach Property Owners Association – Letter to NAE – October 6, 2015
Docko, Inc., Mystic, CT – Letter to NAE – October 5, 2015
Barbara D., Massapequa, NY – Letter to NAE – October 5, 2015
Joe and Nancy Kmetz, Shelton, CT - Letter FW to NAE by CCE – October 5, 2015
Niel Michaelson, Cos Cob, CT – Email to NAE – October 4, 2015
Valerie Kilbridge, Mattituck, NY – Email to NAE – October 3, 2015
John Meeks, Wilton, CT – Letter to NAE – October 2, 2015
Mark Homberg, West Haven, CT – Letter to NAE – October 2, 2015
Boats Incorporated, Niantic, CT – Letter to NAE – October 2, 2015
Sailer Environmental, Madison, CT – Letter to NAE – October 2, 2015
Robert Todd, Hamden, CT – Letter to NAE – October 1, 2015
Cheryl & Deborah Robin-Amendola, New Haven, CT – Letter to NAE – October 1, 2015
Leonard Rosati - Letter to NAE - September 29, 2015
Niantic Bay Yacht Club - Letter to NAE - September 28, 2015
Gulf Oil, L.P., New Haven, CT – Letter to NAE – September 28, 2015
Unit Owners Association at Guilford Yacht Club, CT – Letter to NAE – September 28, 2015
Magellan Midstream Partners, LLC – Letter to NAE – September 25, 2015
Nancy & Donald Simmonds, Shelton, CT – Letter to NAE
Masons Island Marina, Mystic, CT – Letter to NAE – September 23, 2015
Riverside Yacht Club, Greenwich, CT – Letter to NAE – September 23, 2015
David Carr, North Haven, CT – Email to NAE (Morris Cove) – September 21, 2015
David Friedman, Saint James, NY – Letter to NAE – September 18, 2015
Saybrook Point Inn and Marina, CT - Letter to NAE – September 17, 2015
Angela Hamberger – Letter to NAE – September 12, 2015
Cynthia Hurtt Wilbur, Farmington, CT - Letter to NAE – September 10, 2015
Vicky Harris, Farmington, CT – Letter to NAE – September 10, 2015
David Winston, Stamford, CT – Letter to NAE – September 9, 2015
Maureen Bright, Huntington, NY – Letter to NAE – September 9, 2015
Barbara Reiss, Commack, NY – Letter to NAE – September 9, 2015
Bob Giordano, Huntington, NY – Letter to NAE – September 4, 2015
Rex Marine Center – Letter to NAE – August 30, 2015
Thames River Properties LLC, New London – Letter to NAE – August 27, 2015
Bill Spicer, Spicer's Marina, Noank, CT – Statement to NAE – August 27, 2015

Petzold's Marine Center, Noank, CT – Letter to NAE – August 26, 2015
Brewer Yacht Yard at Mystic, CT – Letter to NAE – August 26, 2015
Crocker's Boat Yard, New London, CT – Letter to NAE – August 26, 2015

Specific Responses to Testimony Received at the Public Hearings

Specific responses were also made to the testimony received at the six public hearings in New York and Connecticut. The comment/response table lists these in the order they were made to each hearing. Some of the responses to the testimony also reference the reader to the General Responses noted above.

Correspondence Received After Closure of the Public Review Period

Any written comments on the draft DMMP/PEIS received after closure of the public comment period on October 16, 2015 were examined for postmark. Those postmarked on or before October 16 were accepted and included in Part 2A and were considered in finalizing the documents. Those received with postmarks after October 16 are archived with the project administrative record at the New England District, and were not considered in the preparation of the final DMMP/PEIS. A list of the letters and emails received in response to the public review, but after the closure of the review period, is included in Part 6 of this appendix.

Continued State and Agency Coordination during Preparation of the Final DMMP/PEIS

After closure of the public review period coordination with Federal agencies, the states and their agencies, and Congressional interest continued during preparation of the final DMMP/PEIS. These letters are included in Part 1B of this appendix.

List of Comment Response Tables

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Table A-1 - General Comments and Responses	
Response ID	Subject & Comment Topic and Response
0002R	Subject: General Response to Environmental Degradation/Consequences and Economic Cost of Open-Water Placement
	Response: Nearly 40 years of studies under the DAMOS program and by others have shown no long-term environmental degradation or economic cost resulting from open-water placement of suitable dredged materials. EPA develops site management and monitoring plans for open-water sites that must be updated every 10 years. There must be frequent site investigations to verify an appropriate level of management is being followed, and implement changes to the management plan if needed.
0003R	Subject: General Response to Public Involvement Process-NEPA
	<p>Response: The USACE issued public notices and press releases through print and broadcast media notifying the public of the availability of the draft DMMP/PEIS and the location and schedule of public hearings in CT and NY. In addition, the USACE e-mailed this information to their extensive mailing list of parties who have requested to stay informed of the DMMP/PEIS effort.</p> <p>The USACE listened to the public's request for additional time to review the document and extended the comment period out to 60 days and held two additional hearings in September 2015.</p>
0004R	Subject: General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives.
	Response: The DMMP identifies and screens all practicable alternatives, including beneficial use, but does not select a specific alternative for implementation at this time. The Project Development Team for the DMMP, which developed the inventory of placement alternative types, included Federal and state agencies from the three states. The screening evaluated 149 alternatives, including several beneficial use categories, which resulted in over 14,000 project-alternative site pairings. In the future, when dredging is being proposed for specific sites, the DMMP alternatives will be a place to start to review the viability of these alternatives as well as any additional alternatives that would be appropriate. The USACE is required by Federal law to identify a base plan which consists of the least costly, environmentally acceptable alternative, consistent with the requirements of the Clean Water Act, MPRSA, and other applicable laws. However, other USACE programs are available for alternative placement opportunities if non-Federal partners are willing to participate in their implementation. The beneficial use alternatives that are feasible are highly dependent on the physical characteristics of the material. Silt material – a very common product of dredging – may be used for marsh creation, but has limited beneficial use options because it usually is not compatible with beach nourishment, is not an appropriate construction material, and has a salt content too high for landscaping.

Table A-1 - General Comments and Responses	
0005R	<p>Subject: General Response to Sediment Contamination and Dredged Material Sampling and Testing</p> <p>Response: Before any dredged material can be placed at an open-water site, rigorous physical, chemical, and biological testing must be performed, on both the sediment to be dredged and the reference area for the proposed placement site. This testing ensures that the placement of dredged material in the sound will not have a significant impact on the human environment or ecology of the placement site. These test results must be reviewed for each project independently by US EPA and the state regulatory agencies before placement can be approved. Dredged material which fails these tests may not be placed in the open waters of the sound and must be confined by some other method. Detailed information on this subject has been added to the DMMP (see Section 3.5.1).</p>
0006R	<p>Subject: General Response to Dredging Needs and Economy, and No Action Alternative</p> <p>Response: The dredging needs analysis conducted for the DMMP showed a maximum of 53 million CY of needed dredging in the Long Island Sound region over the next 30 years. While it is unlikely that all of the projects would be funded, meeting the bulk of this need is critical to maintaining the navigation-dependent sectors of the regional economy as referenced by many commenters. Increased dredging and placement costs would impact the economic viability of these industries.</p>
0008R	<p>Subject: General Response to Confined Aquatic Disposal Cell Development</p> <p>Response: CAD cells are designed with a cap of suitable material of a thickness applicable to the particular site, normally at least three feet. In areas of high traffic, cell thickness can be increased and cells are monitored post-construction to ensure cap integrity. Future dredging and other activities would not be allowed to occur in a manner to impact the cell cap.</p> <p>CAD cells have been constructed in several locations throughout New England over more than 20 years. CAD cells have been constructed both in large ports, such as Boston and Providence, and in smaller harbors, such as Hyannis and Norwalk. CAD cell sites are monitored post-construction to ensure continued cap integrity. In all cases, capping has prevented re-exposure of the confined materials. Any new cells created for the confinement of unsuitable dredged materials in LIS would be similarly designed and monitored. Where necessary, cell caps can be augmented by placement of additional cap material in the future.</p>
0009R	<p>Subject: General Response to Sediment Reduction Efforts</p> <p>Response: Watershed level sediment and contaminant reduction are efforts beyond the authority of the USACE to recommend or implement. As the commenter states, the EPA and the States of CT and NY have in Appendix E outlined their current programs, authorities, and efforts to address sediment reduction at a watershed level. The DMMP encourages EPA and the states to continue and expand these efforts moving forward.</p>

Table A-1 - General Comments and Responses	
0015R	<p>Subject: General Response to LIS as an Estuary of National Significance</p> <p>Response: Congressional designation of Long Island Sound as an "estuary of national significance" means that LIS has been selected to be part of EPA's National Estuary Program, and therefore eligible for Federal funding under section 320 of the Clean Water Act. Those funds have been used to establish the LIS Study office, support investigations of the Sound, and engage agencies and the public in those efforts. Inclusion of LIS in the National Estuary Program does not prohibit other uses, such as open water placement of dredged material, and as long as that placement is conducted in the environmentally protective manner, which current practices of site identification, management and monitoring ensure. Dredged material placement in LIS is not inconsistent with the Sound's national significance designation.</p>
0027R	<p>Subject: General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement</p> <p>Response: The USACE agrees with the commenters that even where the Federal base plan is open water placement, there may be other environmentally beneficial placement options. The DMMP identifies a wide range of alternatives to open water placement for the various projects and dredging centers. The question is not whether or not there are alternatives, but how they must be paid for under Federal law. As described in the DMMP, Section 1.3.6, the USACE is required to identify the least costly environmentally acceptable placement option for dredged material from Federal projects (the Federal Base Plan). The base plan can be a beneficial use, and often is when the material is clean sand and adjacent beaches can be nourished. Where there is a potential beneficial use that is more costly than the base plan the USACE and project sponsors will investigate to determine if economic and environmental benefits of that beneficial use offset any increase in cost over the base plan. If there are sufficient incremental benefits to the beneficial use, then the USACE and project sponsor may share that incremental cost provided a Federal authority exists for that beneficial purpose. Federal authority exists to use dredged material for hurricane and storm damage reduction, flood risk management, and ecosystem restoration. Where the beneficial use is not covered by another Federal authority, or where the economic and environmental benefits of the beneficial use are found not to offset the incremental cost over the base plan, then that beneficial use can still be pursued if the non-Federal sponsor is willing to pay the entire cost over the base plan. In the case of using sand for beach or nearshore bar nourishment purposes state and municipal sponsors have been increasingly willing in recent years to pay even the entire cost difference to use that material. As the DMMP states, future projects will need to conduct their own detailed analysis of beneficial use options, using the DMMP as a guide, to</p> <p>determine if such options are applicable, whether other Federal programs may apply, and whether sponsors are willing and capable of providing the necessary cost-sharing and meeting other aspects of non-Federal responsibility for the project. As the DMMP moves from a plan to implementation the States will need to champion and help fund the detailed studies, design and implementation of beneficial use opportunities.</p>

Table A-1 - General Comments and Responses	
0031R	<p>Subject: General Response to Hypoxia and Nutrients</p> <p>Response: Open water placement of dredged material in the western areas of LIS does not serve to worsen the present hypoxia situation in those waters. Because of the limited footprint of material placed at the sites in a given season and the general similarity of the dredged sediment with the ambient material at the sites, a significant increase in oxygen demand is not expected. Further, the hydrodynamics of the scow release serves to enhance water column mixing on a localized scale because entrainment of near-surface water. In addition, based on EFH considerations, placement operations at the Long Island Sound disposal sites are not permitted from June 1 through October 1, the period when hypoxia is most likely.</p>
0033R	<p>Subject: General Response to Long Island Sound Protection Efforts</p> <p>Response: Please see the General Responses to Sediment Contamination (DR0005R) and Site Management and Monitoring Plans (SMMPs) (DR0302R).</p>
0041R	<p>Subject: General Response to Availability of Open-Water Alternatives</p> <p>Response: Because these open-water sites are open and currently available for the placement of dredged material, they were considered alternatives for the analysis conducted in the DMMP and PEIS. The future status of these sites is unknown and is not determined by the DMMP. These sites may or may not be available in the future for the placement of dredged material.</p>
0042R	<p>Subject: General Response to DMMP Goal to Eliminate or Reduce Open-Water Placement or Phase Out Open Water Placement</p> <p>Response: The regional DMMP for Long Island Sound was developed to support the goal of reducing or eliminating the placement of dredged material in Long Island Sound by being a guide for the cost-effective and environmentally acceptable management of dredged material in the region. The DMMP identifies alternatives to open-water disposal and develops procedures and standards for the use of practicable alternatives to open-water disposal, so as to reduce wherever practicable the open-water disposal of dredged material. The DMMP also makes recommendations regarding the use of the sites themselves. In addition, the DMMP recommends that the Long Island Sound Regional Dredging Team should be continued. Regional dredging teams, such as this one, are important tools in managing dredged material placement on a regional basis and in developing practicable cost-effective beneficial use alternatives and building the case for the partnerships and funding needed to implement those alternatives.</p>
0072R	<p>Subject: General Response to Consideration of Mine Reclamation Alternatives</p> <p>Response: The mine reclamation alternative in Hazelton, Pennsylvania was excluded from further consideration in the DMMP and PEIS because the costs for using this alternative site were calculated and it was significantly more expensive than other alternatives analyzed. Section 4.9.12 of the DMMP has been edited to provide additional discussion of mine reclamation demonstration efforts using dredged marine sediments in Pennsylvania.</p>

Table A-1 - General Comments and Responses	
0073R	<p>Subject: General Response to Confined Disposal Facilities as Alternatives</p> <p>Response: The DMMP identifies a number of CDF opportunities in the LIS region, many of which have been the subject of prior studies over the past four decades. As the DMMP describes, CDFs require a significant public investment to implement, and need to be coordinated among all levels of government, with long-term site management by a state agency or port authority. This is precisely how the large scale CDFs at Norfolk Harbor (Craney Island) and Chesapeake Bay (Poplar Island) were developed, built, managed and expanded over the years. In Long Island Sound, non-Federal interests will need to advocate and sponsor the studies, design and ultimate construction of such facilities if any are ever to be developed. Until that interest and willingness to fund such regional alternatives develops, projects that would fill only a small portion of such facilities have nothing to consider. As with all the alternatives presented, the DMMP is a guide to the USACE, other agencies, the states and private dredging interests as to what alternatives could be considered.</p>
0074R	<p>Subject: General Response to Adequacy of Agency and Stakeholder Coordination</p> <p>Response: First, in preparation of the DMMP, public outreach to agencies, municipalities, and other interested stakeholders and parties was carried out at numerous opportunities. Public scoping meetings were held in the beginning of the study. Public information meetings were held a key points in the process. A technical working groups was established with the specific goal of soliciting input to the study from stakeholders and local interests, with meetings of that group held at various decision points in the study process. Newsletters on study progress were published periodically during the study.</p> <p>Second, the DMMP identifies a wide range of alternative placement options, including many beneficial use options. For the DMMP all on-shore alternatives were investigated by contacting the owners of those properties, which in some cases were municipal officials. Specific projects will need to each do their own investigations and coordination at all levels as they are funded for pre-construction NEPA analysis. State and local agencies will review any proposal for upland placement if and when such placement is actually considered or proposed.</p>
0076R	<p>Subject: General Response to Cost of Beneficial Use Alternatives</p> <p>Response: Beneficial use is not being rejected or dismissed. It requires a level of non-Federal involvement that hasn't been proffered yet and we wouldn't expect that to be proposed until specific projects come up for implementation. See also the General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R).</p>
0077R	<p>Subject: General Response to Navigational Safety</p> <p>Response: When you increase the cost of dredged material placement, you reduce the economic viability of dredging project particularly those involving smaller projects and public landings. Without economical disposal, that reduction in dredging leads to reduced public access, increase shoaling and grounding and in increase is inherent dangers to navigation and public safety that would arise.</p>

Table A-1 - General Comments and Responses	
0084R	<p>Subject: General Response to Benefits of and Value Assigned to Beneficial Use Alternatives</p> <p>Response: The economic, societal, and environmental impacts of beneficial use projects for dredged material are measured as the benefit of using the material in those manners, as compared to the incremental cost of implementing such projects in excess of the costs that would occur with the Federal Base Plan, if that is different. This requires an allocation of both costs and benefits to the different purposes of the combined project. Beneficial uses as part of Federal projects are warranted and justified only if the incremental cost of their design, construction and future maintenance is outweighed by their beneficial impacts. Allocating the benefits of beneficial use alternatives as costs to other plans would be an inappropriate comparison of their relative merits.</p>
0085R	<p>Subject: General Response to Upland Placement Alternatives for Dredged Material</p> <p>Response: As part of the LIS DMMP activities an inventory was conducted in the three states to identify potential upland placement sites for dredged material, as well as potential shoreline transfer/dewatering sites. The transfer/dewatering sites are needed so that dredged material can be offloaded from scows or barges and dewatered before further transportation or placement. Dewatering facilities need sufficient land to incorporate containment dikes, transfer and loading areas, and the material itself. In some instances material remains in the dewatering facility permanently. In other cases it is moved either when dewatered or at a later date to an upland facility to free up capacity in the dewatering site for additional dredged material. One constraint in upland placement is the scarcity of dewatering sites along the shoreline with direct access to a waterway that would allow offloading of the dredged material. That is due to the high cost of land in the coastal area and the significant development that has occurred there. In order to place material upland the dredged material needs to be handled multiple times into and out of dewatering facilities for transport to a final site, and distribution within sites, thereby significantly increasing the cost of final placement of the material.</p> <p>The upland placement inventory initially identified 333 potential alternative sites in the three states. However, the upland site list was reduced to 136 alternative sites by removing sites that were determined, after a more detailed assessment, to likely not be feasible due to significant resource impacts, competing land uses, municipal zoning requirements, nearby housing and schools, and other factors. Of the remaining 136 potential sites, 106 or 78 percent were either beaches or nearshore berms on which only compatible sand can be placed. Only 22 percent of the identified upland sites could be potentially used for suitable or unsuitable fine grain material, which comprises approximately 71 percent of the projected dredge material. Of the final sites, only three were landfills that could accept dredged materials; two in New York and one in Connecticut. Simply put there is insufficient capacity to place all of the anticipated dredging needs in upland sites.</p>

Table A-1 - General Comments and Responses	
0148R	<p>Subject: General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor</p> <p>Response: In response to the many comments received from the public and agencies on the use of the Morris Cove Borrow Pit as a CAD cell, the section of the DMMP in Chapter 4 (Section 4.9.8) describing Morris Cove and its potential use has been expanded to include additional information on CAD cell technology and on the Morris Cove site in particular.</p>
0151R	<p>Subject: General Response to Cumulative Impacts</p> <p>Response: The USACE under its DAMOS program has been monitoring dredged material placement sites in LIS since the late 1970's. To date, the DAMOS Program has generated over 200 detailed reports addressing all of the major questions and concerns related to placement of dredged material in an aquatic environment. Sequential surveys of biological conditions at sites following the placement of dredged material consistently show a rapid recovery of the benthic community to that of the surrounding habitat outside of the disposal site. The placement sites and surrounding areas are actively fished throughout New England waters, with no discernable impacts. Further, the US EPA and other agencies have conducted studies over the years on the impacts of dredged materials throughout the Sound, which are captured in the 2003 and 2004 Long Island Sound Designation EIS.</p> <p>Chapter 4 of the PEIS (Affected Environment) characterizes the physical, environmental, infrastructure, and cultural resources in Long Island Sound that may be affected by the placement of dredged material. Temporal changes and spatial distribution of these resources are described. Section 5.1 of the PEIS provides a description of the general impacts to these resources, with cumulative impacts being presented in Section 5.4.</p>
0153R	<p>Subject: General Response to Nitrogen Loading</p> <p>Response: The DMMP and PEIS have been updated to include a discussion of the nitrogen loading in the Sound from dredged material placement. Section 3.5.2 of the DMMP and Section 4.5.1 of the PEIS have been updated with this information.</p> <p>The annual placement of dredged material at the open-water sites in Long Island Sound is not considered significant (estimated to add less than one tenth of one percent of the overall annual nitrogen loading to Long Island Sound), even under future TMDL compliance conditions.</p>

Table A-1 - General Comments and Responses	
0154R	<p>Subject: General Response to Placing of Dredged Material in the Aquatic Environment, Resuspension and Migration of Sediment</p> <p>Response: Dredged material can be placed in the aquatic environment with very high accuracy. For nearshore placement or for placement within a CAD cell, material can be placed within 10's of feet of a target location. Of all the disposals at CAD cells, there has never been an instance where material has not been placed into the CAD cell. Even in deeper, open-water locations, material can be placed within 100-200 feet of a target location.</p> <p>Multiple field investigations have clearly demonstrated that only a very limited amount of material is released to the water column during placement. This is supported by computer simulation and academic studies of the hydrodynamics of materials falling through a water column.</p>
0203R	<p>Subject: General Response to LIS Lobster Population Decline and Impacts</p> <p>Response: As described in Section 4.9.1 of the PEIS, historical lobster catch data show an abundance peak in 1997, followed by a steady decline in the standardized catch since 1999, when American lobsters in western and central Long Island Sound (in both Connecticut and New York waters) experienced a significant mortality event. Following the 1999 mass mortality event, a collaborative research initiative, including nearly 60 researchers, was funded to investigate the effects of environmental factors, mosquito control pesticides, and diseases on the physiology and health of the southern New England lobster population. Based on the findings of these and other researchers, the warmer water temperatures documented in Long Island Sound are believed to have been a primary initiator of the 1999 lobster mortality event and are consistent with the significant increase in global sea temperatures measured over the past 30 years. Global warming trends are anticipated to interact with additional natural and anthropogenic influences, particularly in coastal estuarine areas. For example, hypoxia (decreased oxygen) is exacerbated by climate-driven ocean warming effects, which decreases oxygen solubility in seawater. Elevated water temperatures can also cause lobsters to be more susceptible to other stressors, including shell disease. Existing literature does not support a strong role for environmental contaminants in explaining either the 1999 event or the subsequent lack of recovery. In addition, monitoring studies conducted at the Rhode Island Sound Disposal Site (RISDS) have shown that 1.5 years after the placement of dredged material, lobsters were captured in relative abundance compared to nearby areas of Rhode Island Sound. These results indicate that the lobster population at the RISDS did not appear to have experienced significant adverse impacts from the placement of dredged material in the open-water environment.</p>

Table A-1 - General Comments and Responses	
0302R	<p>Subject: General Response to Site Management and Monitoring Plans (SMMPs) for Open Water Placement Sites</p> <p>Response: Management plans for ocean dredged material disposal sites are required pursuant to §102(c) of the MPRSA, as amended by §506(a) of the Water Resources Development Act (WRDA) of 1992. In accordance with MPRSA (Section 103(a)), disposal activities at the site "will not unreasonably degrade or endanger human health, welfare, or amenities, or the marine environment, ecological systems, or economic potentialities". The purpose of a Site Management and Monitoring Plan (SMMP) is to synthesize prior site monitoring results and outline a monitoring program and management plan for offshore dredged material disposal sites (ODMDS) that complies with the requirements of MPRSA Section 103(a). Although this management plan focuses on MPRSA requirements, because sediments in Long Island Sound fall under both MPRSA and CWA regulations, materials determined suitable for disposal under Section 404 of the CWA will also be disposed at the site. Regardless of the source of the material (i.e., CWA or MPRSA), all material disposed at the site will be subjected to the same monitoring requirements.</p> <p>The SMMP serves as a framework to guide the development of future project-specific sampling and survey plans created under the monitoring program. The data gathered from the monitoring program will be routinely evaluated by EPA New England Region, the USACE NAE and other agencies to determine whether modifications in site usage, management, testing protocols, or additional monitoring are warranted. The SMMP will be reviewed on an annual basis and will be revised and updated as necessary (or at a minimum of every ten years as required under MPRSA). Section 2.3 was added to the LIS PEIS to include this information.</p> <p>SMMPs for the CLDS and WLDS were developed by EPA concurrent with the 2004 FEIS. The agencies review site usage and results of continuing monitoring at least annually. The SMMPs for those sites are currently being updated and are expected to be made available in 2016. SMMPs for the sites in eastern LIS would be prepared and made available for review should EPA recommend designation of any sites as a result of its ongoing investigations of that area of LIS.</p>

Table A-2 - Specific Responses to Correspondence Received	
Letters from Governors and Congressional Interests	
Honorable Dannel P. Malloy, Governor of Connecticut - September 18, 2015 Letter (For Letter see Appendix A, Part 2A - Page A-2A-1433)	
COMMENT	<p>This draft plan establishes the best path forward for both Connecticut's maritime industry and the shared resources of Long Island Sound, and it represents the culmination of an eight-year cooperative effort by the U.S. Army Corps of Engineers, the Environmental Protection Agency, Connecticut's Department of Energy and Environmental Protection, the New York Department of State, and New York's Department of Environmental Conservation.</p> <p>The DMMP identifies a range of environmentally sound alternatives for the handling of materials created by dredging projects, such as beach nourishment and wetland restoration, in addition to open water disposal in Long Island Sound. Connecticut is committed to increasing the use of such alternatives wherever feasible and appropriate. However, due to the fine-grained nature of much of our waters' sediment, it is often ill-suited for such beneficial reuse. In such instances, it is critical that Connecticut be allowed to dispose of dredged material at the open water sites currently operated by the USACE in Long Island Sound.</p>
RESPONSE	The USACE looks forward to working with the State of Connecticut to implement the recommendations of the DMMP.
COMMENT	Connecticut is committed to a healthy and vibrant Long Island Sound. We have invested heavily in wastewater treatment plant upgrades and have reduced nitrogen loading by approximately 60%. We are making significant strides in addressing non point sources of pollution. We are implementing a new green infrastructure program and a new Long Island Sound stewardship program. Funded at \$40 million over the next two years, these programs will reduce storm water runoff and increase the health of Long Island Sound.
RESPONSE	The DMMP recognizes Connecticut's programs and efforts to limit and manage sediment and contaminant loading and sources within the watersheds of LIS. The DMMP recommends that EPA and the states to continue those efforts.
COMMENT	Without the continued availability of the four open water disposal sites in Long Island Sound, Connecticut's diverse maritime industry, as well as our overall economy, will suffer irreparable damage without just cause. Dredging will become economically prohibitive, marinas will shutter, harbors will be silted-in, and future generations of Connecticut residents will lose their connection to one of our most important natural resources. This connection is vital to fostering responsible stewardship of this vital estuary among future generations.
RESPONSE	While the DMMP identifies open water placement as the most likely least costly environmentally acceptable alternative for many projects generating fine grained dredged materials, meeting the goal of reducing or eliminating reliance on open water placement will require a further commitment by the states to increase their role to champion and cost-share in beneficial uses and other alternatives.
Connecticut Congressional Delegation - Joint Letter of September 1, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1830)	
COMMENT	We write today in support of the U.S. Army Corps of Engineers Draft Dredged Material Management Plan (DMMP) and Draft Programmatic Environmental Impact Statement (PEIS) for Long Island Sound.

	As representatives from Connecticut, a state with 332 miles of coastline, coves, and harbors on Long Island Sound, we applaud the Army Corps for identifying new environmentally sound alternatives for the handling of dredging materials, such as beach nourishment and wetlands restoration. Knowing that only a small portion of dredged materials can be used on land beneficially, we also understand the continued need for open-water disposal options currently in use in Connecticut waters and support continuing this disposal method for fine-grained materials suitable for open-water placement. As members of the Congressional Long Island Sound Caucus, we have long been advocates for protecting and rehabilitating this critical natural, recreation and economic resource. To that end, we commend the Army Corps for identifying a variety of alternative management options and would like to see the Army Corps pursue beneficial use alternatives whenever feasible.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	In addition to the critical goal of protecting the Long Island Sound, access to a range of dredged material placement options is absolutely vital to our state's economy-and that of the entire Long Island Sound region. According to the DMMP, economic activities that utilize Long Island Sound waterways contribute more than \$9 billion annually in economic output. Additionally, these economic activities support more than 55,000 jobs in the Long Island Sound region. As important, our region is home to a range of federal and military facilities dependent on the viability of accessible and cost-effective placement options. If this dredging plan does not move forward, it is estimated that the region will see a fifteen percent dip in navigation-dependent economic activity revenue in the next two decades, and significant - and perhaps prohibitive - increases in costs for the private, commercial and federal stakeholders.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	The DMMP and PEIS are the result of years of research and planning by the Army Corps and the Environmental Protection Agency, through constructive consultation with the States of Connecticut, New York and Rhode Island. They provide a comprehensive management framework of environmentally responsible and cost-effective disposal solutions for the varying types of dredged materials-specifically outlining plans for a myriad of federal dredging projects in the Long Island Sound region. Connecticut has been responsibly dredging using open-water placement for 35 years and we are pleased that the DMMP, paired with sustainable on-land solutions for suitable dredged materials, will provide the Long Island Sound region with a balanced approach for future waterway maintenance projects.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
CT Congressman Joe Courtney - Statement to Public Hearing August 27, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1847)	
COMMENT	Dredging, and the disposal of dredged material, is a constant challenge in southeastern Connecticut. Unfortunately, the lack of a clear framework for the disposal of dredged materials in the region, as well as ongoing uncertainty over the future use of open water placement, has had a negative impact on private marinas, ports, towns and even the submarine base in my district.
RESPONSE	Please see General Response to Dredging Economy (0006R).

COMMENT	That is why I strongly support the approval of the Army Corps' Dredged Materials Management Plan, or DMMP. It provides a comprehensive management framework of environmentally responsible and cost-effective disposal solutions for the varying types of dredged materials - specifically outlining plans for a myriad of federal dredging projects in the Long Island Sound region.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	The DMMP comprehensively outlines the significant dredging needs in Connecticut and the larger region, with about 53 million cubic yards of dredged materials expected to be removed over the next 30 years. While much of this volume represents federal navigation projects and other federal needs, over 35 percent will be generated by non-federal permit activity-which represents small businesses, marinas, and others whose livelihood depends on dredging.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	<p>To this end, the DMMP identifies environmentally sound alternatives for the handling of dredging materials, such as beach nourishment and wetlands restoration. In Connecticut, dredged materials have not only been used for shoreline replenishment, but also for capping landfills and brownfields sites upland. Notably, I was recently involved in helping facilitate a dredging project that helped to restore a beach in Madison, Connecticut using dredged sand.</p> <p>However, as the DMMP notes, only a small portion of dredged materials can be used on land beneficially. That is why there is an urgent need for open-water disposal options currently in use in Connecticut waters and support continuing this disposal method for fine-grained materials suitable for open-water placement, which the DMMP retains as a needed, appropriate and environmentally-suitable option.</p>
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	In addition to the critical goal of protecting the Long Island Sound, access to a range of dredged material placement options is absolutely vital to the economy of my district and state -and that of the entire Long Island Sound region. According to the DMMP, economic activities that utilize Long Island Sound waterways contribute more than \$9 billion annually in economic output. Additionally, these economic activities support more than 55,000 jobs in the Long Island Sound region. As important, our region is host to a range of federal and military facilities dependent on the viability of accessible and cost-effective placement options. These include Connecticut-based facilities like Naval Submarine Base New London, the United States Coast Guard Academy, as well as the premier submarine builder Electric Boat.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	If this dredging strategy does not move forward, it is estimated that the region will see a fifteen percent drop in navigation-dependent economic activity revenue in the next two decades, and significant -and perhaps even prohibitive -increases in costs for the private, commercial and federal stakeholders. Connecticut has been responsibly dredging using open-water placement for 35 years. Without the DMMP, and the continued access to open-water placement sites contingent on its approval, Connecticut will be negatively and disproportionately impacted -and my district in particular.
RESPONSE	Please see General Response to Dredging Economy (0006R).

COMMENT	<p>The DMMP is the result of years of research and planning by the Army Corps and the Environmental Protection Agency, through constructive consultation with the States of Connecticut, New York and Rhode Island. The DMMP, paired with sustainable on-land solutions for suitable dredged materials, provides the Long Island Sound region with a balanced approach for future waterway maintenance projects.</p> <p>In short, the DMMP is a solid product and deserves support on both sides of the Sound.</p>
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Honorable Steve Israel (NY-3), Member of Congress and the Honorable Kristen Gillibrand, United States Senate – Joint Letter to NAE – August 25, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1857)	
COMMENT	<p>We are writing to request an extension of the public comment period on the Draft Dredge Material Management Plan and the Draft Programmatic Environmental Impact Statement for Long Island Sound. While we understand that the Army Corps of Engineers has already extended the public comment period to October 5, 2015, we believe that additional time is needed for stakeholders to fully review the documents and express their concerns.</p> <p>The Draft Dredge Material Management Plan (DMMP) and the Draft Programmatic Environmental Impact Statement (DPEIS) for the Long Island Sound (LIS) is hundreds of pages long and requires expert knowledge to fully understand the impact on our communities in New York and Connecticut. It is unreasonable to expect the public to fully review this extensive report in the short amount of time currently allotted. While we recognize that there are deadlines that must be met in order to allow for continued dredging of New York and Connecticut's waterways, it is critical that the public be provided sufficient time to have a meaningful role in this process. We have also written to New York State Department of State and Department of Environment Conservation asking that they support extending the final rule deadline to August 2016, which would allow for an extended comment period.</p> <p>In addition to extending the comment period, we also ask that additional public hearings be held in either late September or October. With only ten days between the release of the DMMP and the final public hearing on August 27th, we believe additional time to review the document is needed to maximize public participation. A second round of hearings in October or late September would give the public and all interested parties the appropriate amount of time to review the plan and be prepared for meaningful public hearings.</p>
RESPONSE	Please see General Response to Public Involvement (0003R).
Honorable Lee M. Zeldin, Member of Congress (NY-1) – Letter to NAE August 10, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1924)	
COMMENT	<p>I am writing to respectfully request that you reconsider the public comment period for the Dredged Material Management Plan and Programmatic Environmental Impact Statement for Long Island Sound. Currently the public comment period is only 30 days. I feel that this is much too short a period for documents which have been years in the making and will have an impact on our area for decades to come. Specifically, I request that the public comment period be extended to 120 days to better facilitate public participation.</p>

	<p>The current 30 day period does not allow for the public to adequately review and understand the documents before them. They are hundreds of pages long and require considerable effort to properly understand. This cannot be reasonably expected from the public in only 30 days during the tourist high season of late August and early September. The public hearings available on the issue are also a concern for me. They are currently scheduled for 7 to 10 days after the release of the documents. This again is not enough time for the public to adequately review the documents and provide substantive feedback at the hearings, particularly when an Army Corps of Engineers representative mentioned during our congressional briefing on the matter that it took him a week to review the documents. It will obviously take more time for a member of the public who is not already well-versed in the specificities which the document addresses. This problem can easily be rectified by scheduling additional hearings in October to supplement the August hearings.</p> <p>Once again, I would like to emphasize how important this issue is to my district. I want to ensure that everyone has an opportunity to review and provide substantive feedback on the comprehensive plans that are being presented to us. Therefore, I again request that the comment period be extended to 120 days.</p>
RESPONSE	Please see General Response to Public Involvement (0003R).
Correspondence Received from Federal Agencies	
U.S. Environmental Protection Agency – October 16, 2015 Letter (For Letter see Appendix A, Part 2A - Page A-2A-1)	
COMMENT	Furthermore, the Corps notes that additional project-specific and alternatives-focused NEPA analyses will be prepared that will build upon the general information presented in the DPEIS. EPA agrees and underscores that the level of general information provided in the DPEIS does not obviate the need either for future project-specific consideration of alternatives, impacts and mitigation in the NEPA context, or for compliance with the regulatory review process where the requirements of other statutes, such as the Marine Protection, Research, and Sanctuaries Act (MPRSA), Clean Water Act (CWA), Rivers and Harbors Act, National Historic Preservation Act, and the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA), continue to apply.
RESPONSE	The USACE agrees with the EPA. All future projects, whether Federal or non-Federal, will require their own project-specific NEPA investigations and documentation, including alternatives analysis, and compliance with all applicable regulatory requirements.
COMMENT	EPA supports the overall goal of the DMMP which " .. is to ensure that dredging needs for Corps Navigation Projects are met and that proper planning may, over time and where practicable, reduce or eliminate the need for open-water placement in the Sound." In addition, we hope that the DMMP will become a tool that helps to increase opportunities to use dredged material beneficially. EPA reviewed the DPEIS with a focus on whether or not the DMMP will help guide management actions to achieve these goals.
RESPONSE	The USACE agrees with the EPA. The DMMP is intended to be a guide for future projects both in the investigation of placement alternatives, for the states and communities in developing and implementing placement alternatives, particularly beneficial use, and the management of dredged materials and alternative placement sites regionally, all with the goal of reducing, where practicable, future reliance on open water placement.

COMMENT	EPA appreciates the opportunity to offer comments on the DPEIS and encourages the Corps to work closely with EPA and other interested federal and state agencies and other stakeholders to develop strategies to effectively address the issues identified in this letter and attachment. Based on comments raised in this document we have rated the DPEIS EC-2 in accordance with EPA's national rating system, a description of which is attached to this letter. We believe the Corps can address these comments in the FPEIS for this project. Please feel free to contact Timothy Timmermann of the Office of Environmental Review at 617 /918-1025 to discuss these comments.
RESPONSE	See General Response to Agency and Stakeholder Coordination (0074R).
COMMENT	Page E-3: fourth paragraph. Language provided throughout the DPEIS concludes that, "...decision-makers will be able to evaluate different dredged material placement options with full knowledge of potential environmental consequences." We would offer that the general nature of the DPEIS characterization of impacts will limit the use of the DPEIS by decision-makers. Instead, the DPEIS can be used to help guide future NEPA reviews and permitting considerations where site specific impact characterization is likely to be necessary to inform decisions regarding implementation of any given disposal option for a project. We strongly recommend that the FPEIS be revised throughout to clarify/remove this discrepancy.
RESPONSE	The USACE agrees with the comment. The PEIS has been updated to revise the cited sentence as follows: "decision-makers will be able to evaluate different dredged material placement options using the PEIS to help guide future NEPA reviews and permitting considerations where site specific impact characterization is likely to be necessary to inform decisions regarding implementation of any given disposal option for a project."
COMMENT	Issue Identification Chapter 7, page 7-5 in Table 7-2: The issue identification section of Chapter 7 could have gone further to respond to identified issues to the benefit of future reviews of specific projects. A more detailed response could have been provided concerning the management and monitoring efforts at open water sites and the fact that each project is evaluated on an individual basis before it could potentially be determined suitable for open water disposal. The response provided in the DPEIS does not address, summarize or restate the processes. This is an opportunity to remind reviewers that there is a rigorous regulatory process in place for each project and before any project is approved for disposal. We recommend that the FPEIS include a more complete response to these issues.
RESPONSE	The USACE concurs with this comment. Additional detail on the sediment suitability process and site management plan has been included in the Final DMMP and PEIS.
COMMENT	Comment 1. Chapter 5, Page 5-29 et seq. In the discussion of the physical impacts of the use of "dean fill" at brownfield sites, the text should indicate that "clean" may require removing any salt from the materials before they are used for fill. As noted elsewhere, Long Island lies atop a sole source aquifer, and contamination of a drinking water source by salt should be avoided.
RESPONSE	The USACE concurs with the comment. The following test has been added to the PEIS under Physical Impacts: "In addition, depending on the location of the site, removal of salt from the materials may be necessary to avoid groundwater impacts to potential potable water supplies."

COMMENT	Comment 2. Chapter 5, Page 5-30, 5-31. The text states: "Where wetlands or critical habitats are located within or near a Brownfield redevelopment site, these resources could potentially be buried or destroyed. However, a Brownfield redevelopment project represents the opportunity to improve previously degraded environmental resources by removing invasive species, . reconstructing wetland hydrology, reintroducing native vegetation, and improving sediment and soil quality." The nexus between reuse of dredged material, brownfields sites and natural resource restoration is not clear. The availability of clean fill is not likely to produce more brownfield sites for reuse. Also, brownfield sites in the region have not typically been restored as natural habitats, such as parks or recreational areas. It is probably supportable to conclude that the availability of clean fill may reduce the cost of remediating contaminated brownfields sites, but without identifying specific proposals, it is a stretch to say that the availability of clean fill will result in the restoration or creation of natural resource areas or parks.
RESPONSE	While most Brownfield restorations involve creation of new developable land, occasionally the opportunity may arise where portions of a site may be converted to habitat. Dredged material may be used in some of those applications, but we agree that the mere availability of dredged material would not create new sites for redevelopment.
COMMENT	Comment 3. Chapter 5, Page 66-68. Table is mislabeled. The text says Table 5.3 but it is titled as Table 5.3 and Table 6.3 in document.
RESPONSE	The tables appear to be labeled correctly in the Public Draft dated August, 2015. However, there were two incorrect references to Environmental Consequences sections that were updated (the reference was to Sections 6.1 and 6.3 but should have referenced Sections 5.1 and 5.3).
COMMENT	Comment 4. Chapter 5, Page 69 Table. 5-3 Column one under Water Quality/Past Actions. The sentence "In recent years, hypoxia has been ... " should be relocated to the Present Actions column.
RESPONSE	Hypoxia has been recognized for the past few decades and continues to be an issue in LIS due to multiple factors. Both the Past and Present Action columns were updated to reflect this.
COMMENT	Comment 5. Chapter 5, Page 69. Table. 5-3 Column one under Water Quality includes TMDL as an action for reducing impact but does not include other local and national efforts for reducing water quality impacts such as changes in zoning laws for land use and development, technologies such as Low Impact Development and other efforts to reduce impacts from impervious surfaces. We recommend that these actions be incorporated into the table.
RESPONSE	Additional text was added to Table 5-3 of the PEIS to reflect that other actions to reduce water quality impacts have been initiated.
COMMENT	Comment 6: Chapter 5, Page 5-1. This section describes the cumulative impacts from each alternative. Cumulative impacts from open water disposal are summarized as minor and temporary impacts. However, the same section, states that general impacts are addressed and more information is found in the Affected Environment section (Chapter 4). Chapter 4 states that impacts in the PEIS are discussed in a general nature. We recommend that the Corps provide more detail, such as examples from previous studies, on the determination that cumulative impacts are minor and provide references for such determinations in addition to referencing Chapter 4 of the PEIS.

RESPONSE	Cumulative impacts are addressed in PEIS Chapter 5, Section 5.4.5. Additional text was added to this section to reference the DAMOS program and results from previous studies conducted for the Western and Central Long Island Sound EIS and the Rhode Island Region EIS, as well as documentation of minimal impacts from nitrogen loading based on calculations related to sediment disposal.
COMMENT	Comment 7: The chapters do not include a summary section. The overall discussion in each chapter would benefit from a summary.
RESPONSE	Because information is provided within each chapter, we feel it is repetitious to include a summary for each chapter. In addition, both the DMMP and PEIS include Executive Summaries that summarize the contents of the entire documents.
COMMENT	Comment 8: Page ES-11 Last Paragraph. We suggest adding "amended" dredged material placement to this section (meaning dredged material with cement or other additives). Amended material acts differently, and has different environmental impacts, than unamended material. We recognize that this issue is discussed later in the PEIS.
RESPONSE	Text was added to PEIS Table ES-2, under the Environmental Resources impacts associated with "Landfill Placement of Dredged Material", to indicate that amended dredged material acts differently and may have different environmental impacts.
COMMENT	Comment 9: Page 3-30 First paragraph, 6th line. The reference should be to NYSDEC not EDC. NYSDEC sets the TAGMs.
RESPONSE	The USACE concurs with this comment. The PEIS was edited to reflect the NYSDEC and remove the reference to the NYSEDC.
COMMENT	Comment 10: Page 3-30, Third Paragraph. We recommend that the EIS make reference to the use of amended dredged material to close "orphaned" landfills that were closed under older, less protective regulations. Orphaned landfills in the NJ Meadowlands have been closed by using amended dredged material and as upland sites for material not suitable for ocean placement. (DonJon Marine)
RESPONSE	The DMMP evaluates the use of dredged material as daily cover at active landfills. In addition, states may consider using amended dredged material to deal with previously closed landfills.
Commander, U.S. Naval Submarine Base New London – October 9, 2015 Letter (For Letter see Appendix A, Part 2A - Page A-2A-770)	
COMMENT	The Naval Submarine Base New London (SUBASENLON) is submitting this letter of support for approval of the U.S. Army Corps of Engineers (USACE) Draft Dredge Material Management Plan (DMMP) and Draft Programmatic Environmental Impact Statement (PEIS) for Long Island Sound (LIS) released August 17, 2015.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	Submarine operations at SUBASENLON are critical to national defense and SUBASENLON depends on dredging to maintain required depths to homeport Ohio and Virginia class submarines and provide access to our piers to support our mission.
RESPONSE	This statement has been added to the text on the Navy's dredging activities in Section 3.20.4 of the DMMP.

COMMENT	Over the next three years, SUBASENLON plans to dredge approximately 60,000 cubic yards to support the demolition of two piers and construction of a new pier to accommodate the newest Virginia class submarine. In addition, SUBASENLON will require additional future maintenance dredging and concurs with the estimated volumes of material that will need to be dredged for maintenance purposes of improvement projects.
RESPONSE	This information has been added to the text on the Navy's dredging future needs in Section 5.4.3 of the DMMP.
COMMENT	The DMMP recommends that the Regional Dredging Team (RDT) engage those agencies which have not actively participated in the RDT up to this point, including the U.S. Navy. SUBASENLON welcomes an opportunity to engage with the RDT on reducing wherever practicable the open water disposal of dredged material.
RESPONSE	Acknowledgement of the Navy's concurrence with this recommendation to engage with the RDT has been added to Section 7.2.1 of the DMMP.
U.S. Coast Guard Sector New York – September 29, 2015 Letter (For Letter see Appendix A, Part 2A - Page A-2A-1130)	
COMMENT	DMMP Sections 1.2.4 and 3.20.4 – The DMMP should identify Coast Guard Station Kings Point as being co-located at the Merchant Marine Academy at Kings Point, NY. Kings Point is within the jurisdiction of Coast Guard Sector New York.
RESPONSE	The text on USCG activities in the DMMP study area in Sections 1.2.4 and 3.20.4 has been rewritten to provide greater detail on USCG organization, with the Kings Point facility added as co-located with the U.S. MMA.
COMMENT	Comment to Table 1-3 LIS Dredging Centers on page 1-26. The Port Chester/Rye Area Dredging Center is located within USCG Sector NY's and USCG Sector LIS 's jurisdiction.
RESPONSE	Comment understood and noted.
COMMENT	Comment to Chapter 5, Paragraph 5.18 Manhasset and Little Neck Bays Area Dredging Center The DMMP should identify Coast Guard Station Kings Point as being co-located at the Merchant Marine Academy at Kings Point, NY. Kings Point is within the jurisdiction of Coast Guard Sector New York.
RESPONSE	Text and table headings for the Manhasset and Little Neck Bays Dredging Center have been annotated to explain that the USCG Station and US Merchant Marine Academy at Kings Point are co-located.
Correspondence Received from State Agencies and State Elected Officials	
New York Department of State and Department of Environmental Conservation (DOS/DEC) – October 16, 2015 Letter (For Letter see Appendix A, Part 2A - Page A-2A-6)	
COMMENT	DMMP Objective: <i>Identify techniques/best management practices to further reduce sediment and contaminant loading of dredged areas.</i> The DMMP has failed to adequately address this objective.

RESPONSE	<p>Although the 2005 letter from the Governors of New York and Connecticut requested a DMMP focused, among other matters, on the reduction of sediment and contaminant loading, the USACE responded to their letters stating that evaluating the reduction in sediment sources and contaminant loading are beyond the scope that can be funded as part of the USACE DMMP. Thus the states were given the option to provide non-Federal funding to perform these studies, or to perform these studies themselves. The states and EPA decided to work together to gather the necessary information and prepare a report on these issues. The information provided in this DMMP on sediment and contamination reduction is from the report provided by EPA and the states which is included in the appendix to the DMMP.</p>
COMMENT	<p>DMMP Objective: <i>Identify and assess all technically feasible management options, including, but not limited to, dredged sediment treatment technologies, beneficial uses for dredged material, and in-water sediment disposal methodologies.</i></p> <p>The DMMP did not address most of the requirements of this objective. The DMMP was required to identify and analyze all technically feasible management options to addressing dredged sediments, including, but not limited to, dredged sediment treatment technologies, beneficial uses for dredged material, and in-water sediment disposal methodologies, such as CDFs and containment islands. While the draft documents do contain a long list of identified alternatives, they provide little or no analysis of how each of these might be implemented nor an assessment of their feasibility. The required analysis should include identification of potential partners and specific regulatory requirements for each alternative, including the barriers to those options and the steps necessary to overcome them, as well as an assessment of the environmental, social and economic impacts associated with each alternative. This objective was also intended to encourage the standardization of existing methodologies and the development of new technologies for the handling, processing and re-using of dredged material. This objective has not been met by the draft DMMP and PEIS as currently written.</p>
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	<p>DMMP Objective: <i>Identify a comprehensive and coordinated regional practicable strategy for technically feasible and environmentally sound management of material dredged from Long Island Sound, such as an assessment of a public processing facility.</i></p> <p>The DMMP did not address this objective. Although required by the 2005 Rule and the PMP,⁴ the Corps dismissed as infeasible, without an evaluation, the identification of a comprehensive and coordinated regional practicable strategy for technically viable and environmentally sound management of material dredged from Long Island Sound. The Corps did identify one potential site for development with the capacity to handle all dredged material for the region for the next 30 years. The site is identified as the New Haven Breakwaters CDF site and is considered in the draft DMMP as an Island CDF site. The Corps also mentions in the draft document that island and shoreline CDFs have been evaluated extensively throughout the past 40 years and references a report completed by the Corps and updated in Supporting Technical Investigations Document #9. No other discussion or evaluation is provided. However, none of the identified sites are currently available to accept material so as to enable the achievement of the "reduce or eliminate" goal of the 2005 Rule. Thus, the only sites identified as available to accept dredged material are open water disposal sites, which runs in direct contradiction to the 2005 Rule requirements.</p>

RESPONSE	Please see the General Response to Eliminate or Phase Out Open-Water Placement (0042R).
COMMENT	<p>DMMP Objective: <i>Develop alternative management strategies for treating or re-using dredged materials, including the use of decontamination and sediment processing technologies.</i></p> <p>The DMMP lists and summarizes the existing technologies used in other regions for dredged material processing, which is inadequate. The PMP required the DMMP to develop alternative management strategies for treating or re-using dredged materials.⁵ To complete this task, the DMMP must include an evaluation for the development and implementation of alternative management strategies for treatment and beneficial reuse of dredged materials.</p>
RESPONSE	<p>There have been several pilot studies conducted utilizing New York/New Jersey dredged material evaluating innovative technology techniques to decontaminate or process dredged material so that it can be used in a beneficial manner. All of these demonstration pilots involved treatment and or processing of dredged material that was otherwise unsuitable for open water or other placement options. Some of the technologies evaluated included thermal processing so that the end product could be blended with Portland cement for use in construction. Another process evaluated involved soil washing where surfactant were used with high pressure washing to remove certain contaminants. Results of these pilot investigations identified several issues associated with use of innovative technologies for amendment of dredged material. Innovative technology techniques have a high cost per cubic yard for processing of the dredged material. These techniques also have a limited amount of through-put, which is the rate at which dredged material that can be processed. The soil washing process unit was limited to being able to process approximately 100,000 CY per year. Since some of Federal projects can dredge 1 million or more CY in a maintenance event, utilizing innovative technology for processing this dredged material results in the need to store significant amounts of dredged material for processing in multiple years. The existing technology techniques also do not eliminate all of the contaminants contained in unsuitable dredged material, requiring secondary treatment or further amendment before final use or placement is permitted. Based on the capabilities and issues with innovative technology at this time, it would appear that these techniques are more appropriate to small volumes of highly contaminated material that cannot be managed by other placement alternatives.</p>
COMMENT	<p>DMMP Objective: <i>Assess and recommend alternative locations for the treatment and beneficial reuse of dredged material.</i></p> <p>The DMMP does not adequately address this objective.</p>
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	<p>DMMP Objective: <i>Undertake an economic analysis of the sediment management options proposed for future dredging of federal and non-federal projects in LIS harbors and navigation channels.</i></p> <p>The DMMP does an inadequate job of addressing this objective. The PMP lists required studies and strategies for implementing beneficial use alternatives. (PMP at pp.17-18). The DMMP is required to include an economic assessment of the expected benefits and costs of each of the dredged material placement alternatives or combinations of them will be conducted with the strategy and goal of increasing upland capacity and reducing incremental cost per year of treatment and upland disposal.</p>

RESPONSE	Until specific dredging projects are funded for preconstruction, NEPA investigations conducted, and nonfederal sponsors are identified for specific beneficial use options for those projects, a detailed economic and environmental analysis of the impacts and benefits of those placement options cannot be conducted. These actions would occur during the upcoming implementation phase of the DMMP's 30-year plan.
COMMENT	While the draft DMMP provides a list of potential alternatives for each dredging center and shows the list of potential alternatives based on its assessment, it does not include the required comprehensive economic analysis of the sediment management options proposed for future dredging of federal and non-federal projects in LIS harbors and navigation channels that would provide useful information as a basis for future decision-making. ⁷
RESPONSE	Please see above comment and response regarding economic analysis.
COMMENT	One of the major impediments to developing an acceptable LIS DMMP has been the almost exclusive reliance of the Corps on its standard cost-benefit assessment methodology to drive the development of appropriate alternatives and to screen for optimal choices, rather than develop an array of appropriate solutions based on the policies and guidance of existing federal and state resource management statutes and programs. As a result, the draft DMMP identifies "base plans" that recognize only the "least costly" part of the "Federal Standard" definition while ignoring the equally applicable "environmentally acceptable" other half of the equation. The Corps' own regulations (ER-1105-2-100) require an extensive evaluation of beneficial uses as an integral component of the DMMP development.
RESPONSE	Base plans by definition are the least costly of the array of identified environmentally acceptable alternatives as determined by the Federal standard of analysis. Please see General Response to Benefits of and Value Assigned to Beneficial Use Alternatives (0084R).
COMMENT	The selection of a "base plan" must adhere to a procedure of "Management Plan Development Principles" as follows: "[E]ven though funded from different sources, the beneficial use planning effort must be pursued in conjunction with the overall management plan effort to assure the timely availability of dredged material for the beneficial use project. The beneficial use project site must be available to meet maintenance dredging disposal needs." (E-72).
RESPONSE	The DMMP identified a wide range of placement options for each of the 52 federal navigation projects that require periodic maintenance dredging, including beneficial use opportunities. Detailed studies of the economic and environmental impacts and benefits of these alternatives would occur during the implementation phase of the DMMP when specific dredging projects are analyzing specific placement options proposed by non-federal sponsors.
COMMENT	The draft DMMP needs to address how the base plan meets the environmental standards of all applicable environmental laws, including consistency with State coastal policies. The current procedure for the analysis of the selection of alternatives is flawed because all practicable alternatives must be evaluated for compliance with the applicable federal laws, including the CWA and CZMA, prior to a selection based solely on cost.

RESPONSE	In identifying the Federal base plan, the USACE must rely on the Federal standard of analysis to determine the least costly environmentally acceptable alternative. Identification of the base plan does not, however, end the analysis. Beneficial uses that are not the base plan can still be pursued. Should state agencies or other potential non-federal sponsors desire implementation of a plan other than the base plan, whether due to differing state laws/policies, or solely due to an opportunity to leverage another federal beneficial use authority, the USACE would evaluate such proposals in partnership with those sponsors.
COMMENT	An examination of DMMPs developed nationwide for a variety of projects, ports and collective harbors reveals that the LIS DMMP falls short of including the required studies, economic analysis and implementation of beneficial use alternatives.
RESPONSE	Unlike a harbor-specific DMMP which would make a recommendation as to a definite plan to implement one or more disposal options, this programmatic DMMP/PEIS identified LIKELY Federal base plans and a range of alternatives to the base plans. The specific analysis mentioned in the comment must await the implementation phase of this DMMP as individual projects are funded for design and construction and non-federal sponsors elect to participate in those projects.
COMMENT	The LIS DMMP needs to complete and incorporate a Feasibility Study into the DMMP to document the beneficial use constraints and to identify a pathway to overcome regulatory and economic hurdles instead of the current findings that the "Base Plan" for the entire Sound is to ensure the continued and increased usage of open water disposal sites.
RESPONSE	The comment mis-states the purpose and recommendations of the DMMP. Please see the responses to the previous comments above.
COMMENT	The LIS DMMP relies upon, as a sole calculation to determine the lowest-cost alternative, distance traveled and equipment utilized to reach an open water disposal site. The Calcasieu River and Pass DMMP acknowledges storm surge protection from restored wetlands in the cost benefit calculation, concluding that "[s]ediment placed in the [Ocean Disposal Site] would adversely impact efforts for restoring wetland tracts in the Calcasieu Estuary" and would not be consistent with Louisiana Coastal Use Guidelines. (p. 2-38). Sediment placed at open water disposal sites in LIS would also be permanently removed from inclusion at wetland restoration project sites and the short- and long-term costs of this sediment loss needs to be calculated and incorporated into the LIS DMMP. (See WRDA 1992 Sec. 204, as amended [WRDA 2007 Sec. 2037]).
RESPONSE	The cost analysis in the DMMP included all typical costs involved in dredging, transport, and placement of material at the evaluated alternative sites. This included the costs of sampling and testing, NEPA compliance, permitting and approvals, site development, monitoring and management. However, costs and benefits for specific sites and projects would need to await the actual project specific analysis that would occur during project implementation. The USACE agrees that the implementation phase analysis for each project must include consideration of the short and long-term benefits and costs of all placement alternatives evaluated for that project. Non-federal sponsors for those alternative placement options would be key to such implementation.

COMMENT	The pre-draft DMMP also lacks a comprehensive assessment of our State's opportunity costs associated with continued reliance on open water disposal. The State is particularly concerned about the absence of serious consideration of beneficial reuse opportunities as this relates to decreasing costs associated with a clean LIS environment, which supports fisheries, recreation, tourism, and economic development. The DMMP omission of this economic benefit disregards the value of the ecosystem as the necessary sustainable underpinning to the overall economic and environmental health to the states.
RESPONSE	More than three decades of studies by the USACE under its DAMOS program and by other Federal regulatory agencies agree that continued open water placement, monitoring and management of dredged material, which has been found suitable for placement in Long Island Sound using extensive sampling and testing requirements, have shown no significant adverse impacts on the ecology of Long Island Sound or the human environment. Please see the response to the above comment concerning the benefits and impacts of beneficial use opportunities.
COMMENT	<p>DMMP Objective: <i>Define dredging and disposal evaluation, management, and monitoring protocols and review criteria and identify constraints to implementation of changes.</i></p> <p>The DMMP does not, as required, define dredging and disposal evaluation; management; monitoring protocols and review criteria; or identify constraints to implementation of changes. 8 This missing information is necessary for informed decision-making regarding the cost and environmental benefits of alternatives.</p>
RESPONSE	The DMMP identifies and describes the procedures required for dredged material evaluation under the Evaluation of Dredged Material Proposed for Ocean Disposal Testing Manual (The Green Book) and the Regional Implementation Manual (RIM) for the Evaluation of Dredged Material Proposed for Disposal in New England Waters. Further, the NEPA documents supporting designation and selection of open water placement sites in New England each describe in great detail the criteria applied in identifying and evaluating those sites. For each open water placement site, site management and monitoring plans (SMMP) are developed by US EPA and circulated for agency and public review. The SMMPs are revisited and updated approximately every 10 years based on the results of site monitoring by the Federal agencies including the USACE DAMOS program.
COMMENT	<p>DMMP Objective: <i>Clarify and articulate the specific statutory, policy, and management responsibilities of all federal, state, and local agencies and other public and private stakeholders for the implementation of dredged material management in LIS.</i></p> <p>The DMMP provides insufficient information for this objective. While it includes a comprehensive inventory of applicable regulations for projects within the DMMP Study Area, it does not evaluate and identify, as required, the implementation constraints of identified alternatives through the clarification and articulation of the specific statutory, policy, and management responsibilities of federal, state, and local agencies and other public and private stakeholders for the implementation of dredged material management in LIS.⁹ Instead of this required information, the DMMP includes a catalog of agency jurisdiction for each type of alternative.</p>

RESPONSE	The DMMP does not recommend specific placement alternatives for individual projects, rather, it identifies likely Federal base plans and a range of alternatives. In like manner, the DMMP includes a summary of the Federal, state and local agencies and applicable statutes for types of alternative placement. In implementing the DMMP, specific projects would be required to comply with necessary statutes and regulations in evaluating and recommending placement alternatives being implemented by Federal agencies and their non-federal partners.
COMMENT	The DMMP lists (Chapter 6, Section 3), in no particular order of preference, practicability, or feasibility, several sections of various federal laws that provide funding and procedures for beneficial use alternatives to open water disposal. This section is presented in a format that does not make any connections between possible state and local partners and identified locations or projects (federal or non-federal) that could benefit from the listed options, nor does it discuss the added value to the local and regional economies and ecological restoration/storm impact reduction efforts. These analyses would provide a calculable and measurable benefit to offset the perceived upfront low cost of disposing material in the open water, which permanently removes the dredged material from a consideration of beneficial use options. This section should be expanded to address these deficiencies and identify pathways to implementation, including the cost benefit analysis of implementing beneficial use options through these federal statute pathways, to meet this work plan objective.
RESPONSE	Section 6.3 briefly discusses a number of USACE authorities that could be used under appropriate circumstances to implement various beneficial use opportunities. Whether a particular beneficial use opportunity would apply to a specific project in the future must await the project specific analysis that would be accomplished once such a project was funded. Until that time, it would be premature to attempt to identify non-federal sponsors which may be interested in a particular project or beneficial use opportunity. Project specific evaluations would identify and quantify the benefits of beneficial use, the incremental cost of pursuing that beneficial use, whether or not that additional cost was justified under Federal requirements, and the willingness of non-federal sponsors to share in that cost. The cost analysis included in the DMMP captures typical costs for all phases of development and implementation of each placement alternative. As those beneficial uses not identified as likely Federal base plans include the added cost of rehandling and management of the dredged material, and open water placement does not include re-handling, and is almost always the least-cost alternative. Please see General Response to Federal Base Plan Development (0027R).
COMMENT	<p>DMMP TAsk: <i>Indicate where sediment testing for specific characterization purposes will be needed in the future to validate assumptions (risk).</i></p> <p>The draft DMMP and draft PEIS acknowledge the Sound's history as a waste dumping ground and that dredge spoil has for decades been dumped into the Sound. However, the documents ignore the cumulative impacts of past dredging activities.</p>
RESPONSE	Please see General Responses to Sediment Contamination (0005R) and Environmental Degradation and Economic Cost of Open-Water Placement (0002R).

COMMENT	Broad conclusions, such as "[a]lthough short-term impacts and long-term changes in habitat due to sediment type and elevation of the seafloor have occurred, there is no evidence of long-term effects on benthic processes or habitat conditions" (PEIS at 5-4) outright dismiss the identification of adverse impacts from open water disposal. By focusing solely on future disposal events at the sites, and not accounting for the current ecological health of the Sound, as influenced by past actions, or accounting for existing Sound stressors, the draft DMMP and draft PEIS fail to take a comprehensive view of the past use of the Sound. Government agencies cannot rely upon these unsubstantiated conclusory documents for making decisions about future actions in the Sound. Remarkably, the DMMP draws the conclusion that there are no environmental impacts from open water disposal, notwithstanding the acknowledged presence of contaminated sediments at the sites. The absence of studies is not equivalent to a finding of "no environmental impacts". (DMMP at 7-6 and 7-7).
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	[T]he draft DMMP concludes, in the absence of scientific support, that there are no measurable impacts to LIS as a result of past, present and a potential future 30-year increase in the continued use of open-water disposal. The draft documents do not identify what sediment testing is necessary to measure risk and the PEIS, as a Tier 1 NEPA document, does not identify, quantify or acknowledge the regional cumulative impacts of the collective dredging projects over the next 30 years, forecast to generate 52.7 million cubic yards (cy) of dredged material to be disposed of in or near LIS. In particular, in regard to the long-range impacts of using LIS as the location for four open water disposal sites, the draft DMMP provides no provisions for addressing synergistic effects such as the ones referenced in a 1987 document published by the Corps: "During disposal operations, the anaerobic sediments are mixed with aerated surface water, and a complex chemical interaction occurs. Heavy metals such as cadmium, copper, chromium, lead, and zinc, which had been stabilized in oxygen-free sediments, form precipitates and coagulate in the presence of oxygen. Phosphorus and nitrogen can be temporarily released into the water column, while pesticides and oils and grease are usually not very water soluble."
RESPONSE	Prior to the passage of the CWA and MPRSA, the aquatic disposal of dredged material, as well as mixed debris and even hazardous wastes with little or no restriction, clearly had the potential for measureable and long-term impacts in Long Island Sound. This was the case in the coastal waters of much of the United States. The sediment testing requirements and restrictions implemented by the CWA and MPRSA were intended to minimize the potential for impact. Nearly 40 years of DAMOS monitoring has clearly shown that aquatic placement of dredged material can be done responsibly, with limited short-term impacts to the benthic system and the water column and no measureable long-term impacts. Further, the siting of the current Western, Central, and New London sites over areas of historic (pre-CWA and MPRSA) disposal has had the benefit of placing suitable dredged material (with suitability based on physical, chemical, and biological testing) over the historically disposed material. Going forward, the DAMOS Program will continue to verify the placement of material at the designated sites, the recovery of the benthic system at the sites, and the long-term stability of the deposits of dredged material. Given the lack of measureable impacts at the disposal sites, synergistic effects of placement are not expected to be significant. A discussion of the release of nutrients from dredged material has been added to Section 3.5.2 of the DMMP and Section 4.5.1 of the PEIS .

COMMENT	The PEIS bases conclusions on the presumption that if sediment does meet the CWA or Ocean Dumping Act standards, then it would be disposed of in an unconfined state at open water sites. The Ocean Dumping Act however does not permit the use of capping of contaminated materials as an environmentally-sound way to contain them. Moreover, the PEIS acknowledges (p. 5-67) that natural processes and large storms move sediment, sand, and silt throughout the Sound and that sediment transport will continue in the future. In a contradiction, the PEIS draws the conclusion that open water disposal at WLIS, CLIS, and NLDS are considered "non-dispersive" sites because the sites are supposedly stable and no sediment allegedly ever moves from them.
RESPONSE	In the cumulative impacts analysis table on page 5-67 it is noted that distinct placement mounds from current dredged material placement at designated unconfined open-ocean disposal sites have formed. Depending on the source type of material and the placement location, a change in grain size and TOC could occur.
COMMENT	The EPA requires not only the "identification" of alternatives but also the "development of procedures and standards for the use of practicable alternatives to open-water disposal." (40 CFR Section 228.15(b)(4)(vi)(C)). However, the draft DMMP does not contain this information. Instead, the document contains suggestions for the RDT and the states, and identifies studies yet to be completed, rendering the draft DMMP merely a "framework" to guide future decision-making that requires additional research and study. Because the draft DMMP does not meet the section 228.15(b)(4)(vi)(C) requirements, it is a framework document with limited utility. Both "standards" and "procedures" were required to be part of the DMMP, not to be done at some later, undetermined date. The DMMP is not complete until both have been included and developed in detail.
RESPONSE	The DMMP recommends procedures to be followed and standards to be applied in evaluating and recommending dredged material placement options, tracking dredged material placement, pursuing opportunities for alternative and beneficial uses of dredged material in LIS, and researching and monitoring impacts of placement past and future placement activities. The standards developed to implement the DMMP can be found in Section 7.1, and include methods for identifying and evaluating placement alternatives for projects as they arise in the future. Procedures for implementing DMMP recommendations to help meet the goal of reducing, where practicable, future reliance on open water placement can be found in Section 7.2. These procedures include a recommendation for continuing and expanding on the role of the regional dredging team.
COMMENT	As discussed above, the draft DMMP and PEIS were to identify techniques and best management practices to further reduce sediment and contaminant loading of dredged areas. This is a key objective to achieving an acceptable plan. The issue of sediment and contaminant loading was also a subject of the Joint Governor's letter to EPA[2] requesting the completion of the DMMP. The NYS Agencies believe that the intent of the DMMP, as described in the Joint Governor's letter, as well as within the 2005 Final Rule and subsequent PMP (or work plan for the DMMP and PEIS), was to have been completed through the development of this DMMP. By reassigning responsibility for the identification of sediment source loading and formulation of solutions to this problem to the EPA and the state environmental agencies outside of the DMMP and PEIS process, the draft DMMP fails to meet the 2005 Final Rule's stated requirements to "reduce or eliminate" open water disposal.
RESPONSE	Please see General Response to Sediment Reduction Efforts (0009R).

COMMENT	Because the draft DMMP identifies sediment source reduction as a recommendation, funding must be provided to both Connecticut and New York to assist these states in developing further methods and techniques to reduce sediment source loading volumes.
RESPONSE	Please see General Response to Sediment Reduction Efforts (0009R).
COMMENT	<p>DMMP Recommendation: <i>"The Long Island Sound Regional Dredging Team should be continued. The RDT's geographic range should be expanded to include all areas of LIS including those inside the territorial sea in western Block Island Sound. The RDT should also be used by its member agencies to put forth, discuss and examine opportunities to further reduce the need for open water placement of dredged material in LIS, and to identify means for funding and implementing alternatives to open water placement, with a focus on beneficial use."</i></p> <p>There is a distinct disconnect between this recommendation in Chapter 7 and the recommendations section in the Executive Summary. While the recommendation in Chapter 7 states that the RDT should be expanded to include all areas of LIS, the recommendation within the executive summary states that the RDT should be expanded "if" the EPA designates an eastern LIS site. The Steering Committee, at the face-to-face meeting in Chicopee, Massachusetts on March 11, 2015, agreed that the geographic scope of the RDT, as well as its responsibilities, should be expanded regardless of EPA site designations. These conflicting recommendations need to be reconciled clearly in both locations of the draft documents.</p>
RESPONSE	The language in the recommendation section Chapter 7 on the geographic scope of the RDT post-DMMP will be edited to be consistent with the language in the Executive Summary. The recollection of the USACE on this topic from the March 11, 2015 meeting is that no specific agreement was reached on this topic, although the subject was discussed.
COMMENT	The listed "procedures" in subsection 7.2 are also deficient because they must be able to instruct the Corps, EPA, and State partners on how to "reduce or eliminate" open water disposal; in turn, these procedures and standards must be able to be incorporated into the CLIS and WLIS site designations and the SMMP documents. However, the draft DMMP "procedures" are little more than a listing of future work to be completed and future responsibilities and tasks for the RDT. Because the procedures read more as recommendations and a "to do" list for the future, subsection 7.2 does not meet the EPA's 2005 Final Rule requirements and may not be relied upon for the site designation amendments.
RESPONSE	The procedures and standards as included in Chapter 7 of the DMMP set forth the process and means for addressing the DMMP's goal of reducing reliance on the use of open water placement in Long Island Sound. Implementation of these procedures and standards can only be accomplished on a project specific basis as projects are funded in the future. As the requirements and purposes of future projects and applicable placement alternatives will vary, the requirements for non-federal participation can only be determined at that time. The recommendations in the DMMP outline the opportunities available for implementation as that process unfolds. The RDT will be the crucible in which the Federal/state partnerships necessary for such implementation will be forged.

COMMENT	Baseline studies should have already been completed and long-term studies initiated as part of the PEIS for the DMMP, as well as for the EPA's future rulemaking concerning the Ocean Dumping Act Sec. 102 site designations of CLIS and WLIS. This recommendation acknowledges the lack of understanding of the risks and impacts of open-water disposal of dredged materials in Long Island Sound.
RESPONSE	The DMMP/PEIS references and relies on the nearly four decades of work performed by the agencies examining dredged material management in Long Island Sound. While there are commonalities of sediment classification and alternative placement types among the more than 50 Federal projects around LIS, site-specific analysis of these projects and alternatives can only occur once those projects have been funded in the future. Implementation of the DMMP will accomplish those site-specific investigations and make appropriate final recommendations.
COMMENT	The Army Corps of Engineers and US Environmental Protection Agency have not met the sampling and management protocols of the Site Monitoring/Management Plans for CLIS and WLIS. ¹¹ Specifically, compliance with paragraph 2 of the restrictions in the final rule for the designation of CLIS and WLIS and the provisions of 40 CFR 228 (b)(4)(vi) (B) is necessary for the disposal sites to remain open. The DMMP and PEIS should summarize and provide citations of any monitoring reports and studies completed at WLIS and CLIS and discuss how the findings do or do not meet the requirements of the SMMPs.
RESPONSE	Since the adoption of the final rule, there have been eight separate investigations at the Central Long Island Sound Site given that it is the most actively used site. Contributions 163, 165, 175, 177, 184 and 192 can be found on the DAMOS website, and contributions for the most recent surveys are in preparation. For the much less frequently used Western Long Island Sound Site, there have been two investigations; Contribution 177 can be found on the DAMOS website and a contribution for the most recent survey is in preparation. The SMMPs for both sites are currently being updated and will address each specific management focus area.
COMMENT	NYS Agencies can only find a record of two DAMOS monitoring runs at CLIS since the adoption of the final rule. We did not find any record of monitoring runs at WLIS. The monitoring was only for bathymetry and recolonization. The monitoring did not include an assessment of required SMMP Management Focus 3: "progressive, non-seasonal changes in water quality or sediment composition at the disposal site"; Management Focus 4: "progressive, non-seasonal changes in the composition or numbers of pelagic, demersal or benthic biota at or near the sites"; or Management Focus 5: "accumulation of material constituents in marine biota near the site." (SMMP, Sec. 6.1). Note that the DMMP suggests that some of these studies should be conducted by the states or research institutions and the RDT, but it is clearly a federal responsibility under the SMMP.
RESPONSE	Please see previous comment and response regarding the monitoring efforts and CLIS and WLIS.
COMMENT	NYS Agencies do recognize that the SMMP(s) have some reliance on sampling done by others, in particular water quality and trawl data by the State of Connecticut, but we have seen no analysis of the data in relation to the disposal sites and are not aware of any sediment chemistry or bio-accumulation analysis of biota at or near the sites.
RESPONSE	The SMMPs for the Western and Central Long Island Sound sites are currently being updated, and any relevant data will be discussed in the revised plans.

COMMENT	The SMMP is required by federal rule MPRSA 102(c)(3) Section VII) to be reviewed and revised not less frequently than every ten years. Moreover, the SMMP states that the plan will be reviewed every year as part of an agency planning meeting and that a formal review and revision of the SMMP would occur every five years. NYS Agencies are not aware that any review or revision has occurred.
RESPONSE	The draft DMMP has been completed in accordance with the requirements of the 2005 rule and PMP including the development of procedures and standards for its implementation. The SMMPs for the existing sites will be updated following the publication of the amended rule.
COMMENT	The draft DMMP maintains the narrowly scoped view that the placement of "suitable" material within a "carved out" six nautical miles at four "active" open water sites will have no adverse short- or long-term effects on the ecological health to the Sound. This conclusion is drawn and based on the absence of data to the contrary, even though the "procedures" section of the document states that no long-term studies have been completed due to the complexity of completing such studies.
RESPONSE	There have been numerous field investigations at the current open water placement sites. Results of those investigation have indicated that there are no ecological impacts to the Sound that aren't temporary in nature. The DMMP recommends further monitoring to assess/address any potential impacts.
COMMENT	The NEPA process encourages the use of efficiency in the preparation of programmatic environmental impact statements so as to avoid repetition of topics and instead place focus on issues ripe for discussion in the development of future action specific analyses. The "tiering" process (40 C.F.R. Sec. 1502.20) provides the opportunity to further refine the environmental analysis to address unforeseen impacts from future projects that may be identifiable at the time of development. The PEIS, an environmental impact statement written from a high level programmatic standpoint, incorrectly moves beyond this framework and attempts to provide dual purposes to the document and includes the following specific objective: "to evaluate the environmental, economic, socioeconomic, and cumulative impacts of the alternative sites identified in the DMMP with respect to the environment of Long Island Sound region and its tributaries, and provide suggestions for mitigation of the impacts."
RESPONSE	To clarify the purpose of the PEIS, the cited text (PEIS Section 1, Page 1-3) has been revised to read: "to evaluate the potential future environmental, economic, socioeconomic, and cumulative impacts of the various alternative types identified in the DMMP with respect to the environment of Long Island Sound region and its tributaries, and provide suggestions for mitigation of the impacts."
COMMENT	By limiting the analysis in the PEIS to only quantifiable components, in contrast to the requirement in NEPA Sec. 102(B) requiring "presently unquantified environmental amenities and values [to] be given appropriate consideration in decision-making along with economic and technical considerations", the PEIS eliminates the unquantifiable attributes of a beneficial use alternative from its cost/benefit calculations and dismisses the alternatives as unaffordable. Habitat restoration is a prime example of an alternative given insufficient consideration in this manner. Sections 3.7 and 3.8 list only the few habitat restoration projects that were identified in the DMMP. The PEIS should discuss the potential need, impacts and benefits of developing habitat restoration sites, especially tidal wetlands, in light of potential loss of habitat due to climate change and increased sea level.

RESPONSE	Project specific analysis of both future dredging projects and their potential placement alternatives including the evaluation of habitat value and other beneficial use impacts must await the funding and investigation of specific projects. The needs impacts and benefits of alternatives such as habitat restoration are discussed in general in the DMMP/PEIS but cannot be discussed in detail without specific projects and sites proposed.
COMMENT	We also note that the PEIS states that the DMMP will "increase opportunities to beneficially use dredged material for purposes of coastal resiliency and environmental restoration and enhancement." It is not clear that this is true as the DMMP continues to identify in-water placement as the base plan for almost all dredged material generated in LIS. Through its Tidal Wetlands Trends Analysis, New York State has identified an array of potential restoration opportunities that might be suitable beneficial reuse candidates.
RESPONSE	The DMMP identifies a wide range of alternatives to the Federal base plans for each Federal project including beneficial use opportunities applicable to the sediment classifications of each project. The DMMP also recommends a continuation of the RDT to bring the states and other potential non-federal sponsors to develop the specific proposals for the implementation and funding of future beneficial uses (see DMMP Chapter 7). We would certainly expect that NY State would champion those alternatives for restoration that it has already identified as part of their participation in the implementation of the DMMP recommendations through the RDT.
COMMENT	A preferred approach to evaluation of alternatives would be to thoroughly summarize the full range of impacts resulting from use of a given alternative management measure, providing a baseline for comparison of the similarities and differences among the various alternatives.
RESPONSE	Until a specific project is funded for NEPA analysis and implementation in the future, it is not possible to do the detailed analysis required to perform such evaluations. The DMMP anticipates that future projects will be required to perform these analyses with input from the RDT.
COMMENT	The PEIS makes the further mistake of considering all alternatives in isolation, rather than discussing the potential for combining alternatives. In Sections 3.1 and 5.2, there are five scenarios listed under the No Action Alternative. The discussion that follows is based on an "all or nothing" approach in which only one scenario is implemented at a time. While complete reliance on any one of the five scenarios may not be sufficient to address all dredging needs, a sixth scenario utilizing a combination of scenarios 1 through 5 should be added for consideration.
RESPONSE	The DMMP specifically indicates that one or more scenarios may be used for any particular harbor or project. As specific projects are evaluated in the future, all scenarios and practicable combinations would be evaluated.
COMMENT	In assessing impacts of different alternatives, the PEIS (as well as the DMMP) also falls short in considering the cumulative effect of continued physical disturbance from disposal events. The PEIS notes that the impacts to benthic organisms from a dredged disposal event would require months to years for a mature biological community to re-establish.

RESPONSE	Certain management measures, like periodically moving target disposal mounds within sites, help ensure longer term benthic recovery. Section 5.1 of the PEIS discusses in detail studies that have been conducted as part of the DAMOS program on benthic impacts and recovery of open water placement. These studies also have found that the recovery of the mound apex, which is generally the most disturbed area, tends to be slower than at the mound apron, where deposited sediments are thinner and burial impacts are fewer. Mounds that have been in place for two or more years consistently support mature benthic assemblages that are similar to reference areas outside of the open-water placement site and are stable over time. While multiple placements over time will continue to effect benthic organisms over time, direct impacts to these organisms from the placement of dredged material are generally limited to the footprint of the placement mound, which occupies a relatively small portion of the seafloor (working on an actual percentage value, at least for the open water sites). Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	The DMMP and PEIS do not consider a number of State regulations that are necessary to address for development of a workable Plan. Firstly, neither document mentions nor assesses the impact of the Long Island Landfill Law (ECL Sec. 27-0704) and its implementing regulation, 6 NYCRR Subpart 360-8, on the feasibility of upland dredged material disposal or beneficial use in Nassau and Suffolk Counties in New York. The law prohibits the disposal in these counties of anything except "clean fill" as specifically defined in ECL 27-0704(1)(a) and 6 NYCRR 360-8.2(a). Dredged material is not specifically included in the definition of clean fill in 360-8.2(a), but could be designated by DEC as "other recognizable inert material", with "inert material" being further defined as "material that contains neither leachate constituents at concentrations in excess of [New York State] groundwater quality standards nor putrescible material".
RESPONSE	During preparation of the DMMP, specifically the preparation of Federal, State, and Local Regulations and Programs Applicable to Dredged Material Management (TSD #4) the states were asked to provide all statutes, regulations and policies within their state that may impact the siting of potential dredged material placement. If NY State now desires to modify their policies in a manner that may increase access to upland placement alternatives, they may certainly do so. In the future, such information should be coordinated with the RDT as project opportunities arise.
COMMENT	The DMMP also fails to note that shoreline and in-water dredged material management options fall within an exclusion in 6 NYCRR 360-1.2(a)(4)(ix) for materials dredged from the waters of New York State and placed or disposed in accordance with a Water Quality Certification issued by DEC under the Federal Water Pollution Control Act, provided the WQC addresses the placement.
RESPONSE	Please see General Response to Placing of Dredged Material in the Aquatic Environment (0154R). Also see the response to the above comment.

COMMENT	While some of the work plan tasks have been finished, the majority fall short, primarily as a result of incomplete information or analysis. Elements of the work plan that have not been completed include studies on bio-accumulation, long term effects, risk analysis reflecting LIS current conditions, and revisiting the testing protocols and cap requirements, based on new data. Baseline information and data gaps have not been addressed. Additionally, the documents present insufficient information to allow DOS to complete its assessment of project impacts under its CZMA review authority. Instead, the draft DMMP rejects most alternatives as impracticable based on cost alone and identifies a 30-year pathway for the LIS region that is focused on substantially increasing the volume of dredged material disposal at open water sites, all the while assuming the continued availability of NLDS and CSDS as designated open water disposal options pursuant to Ocean Dumping Act. This is not acceptable to the State.
RESPONSE	This comment summarizes all of the State's comments detailed above. Please see our responses to those individual comments.
COMMENT	<p>In order to move forward, NYS Agencies have re-evaluated the gaps and deficiencies in the DMMP and PEIS documents and have identified the following list of studies as critical for future action that should allow the DMMP to comport with the 2005 Rule:</p> <ul style="list-style-type: none"> - A comprehensive ecological analysis and summary of contaminant effects and disposal impacts, based on information catalogued in the Corps' Environmental Data Update Database. - An inventory of applicable regulations and authorities for projects within the DMMP Study Area that includes identification and thorough evaluation of the implementation constraints of identified alternatives. This assessment should address the development of the policies and procedures for implementing practicable alternatives, including identification of funding sources to implement specific management components. - A complete beneficial use analysis, with an economics analysis assessment of plan benefits, including a strategy for increasing upland capacity, identifying and prioritizing strategies and actions needed to reduce incremental costs of treatment and upland disposal, and a cost analysis of the establishment and operation of a new regional processing facility. The analysis should include valuation of lost or affected natural resources and uses. - Climate change impacts are also expected to reduce the Sound's capacity to process additional contamination loads, especially because of warming of marine waters and potential ocean acidification. All alternatives presented within the draft DMMP and PEIS need to be re-evaluated to take into consideration resiliency benefits and climate change impacts, particularly the coordination of Coastal Storm Damage Reduction projects currently in design and those in the feasibility stage, for nearshore placement, dune construction, marsh restoration, CDF and containment island construction.

	<p>- The draft DMMP assumes a determination of suitability for open water disposal based on an outdated biological and chemical standards that have not kept pace with a changing climate and environment, while ignoring cumulative impacts and opportunity costs. The suitability determination is also premised on a false presumption that subsequent limited or no monitoring of open water mounds is necessary once annual multiple disposals have occurred. Due to the difficulty of monitoring dredged material deposited in an open water environment, especially in the context of increased intensity storm events, the NYS Agencies recommend that the draft DMMP more exhaustively evaluate the viability of capping using the types of finer-grained materials typically employed in LIS, as an appropriate method of protecting the environment from deposits of dredged material at disposal sites.</p> <p>In addition to the need for these major studies, an issue that has been raised repeatedly by NYS Agencies is the lack of available testing standards and guidance suitable for LIS. The procedures that have been used for evaluating dredged material for placement in all ocean waters - Evaluation of Dredged Material Proposed for Ocean Disposal - Testing Manual (EPA/COE-503/8-91/001), used in conjunction with the Regional Implementation Manual, do not include an analysis of the particular ecological characteristics of LIS. Testing protocols and models used to evaluate the appropriateness of dredged materials for open water disposal in accordance with the Ocean Dumping Act have been critiqued by scientific experts because of the inaccuracies and inadequacies for determining the safety for disposal in aqueous environments and marine sediments. While the State recognizes that development of a LIS-specific guidance document is beyond the scope of the DMMP, it highlights a further complication for the Corps and EPA in accurately assessing potential environmental impacts of continued open water disposal.</p>
RESPONSE	The USACE wants to thank the NYS Agencies for their participation in this study and their thorough review and comments on the DMMP. Please see our responses to your specific comments above.
<p align="center">New York Department of State and Department of Environmental Conservation (DOS/DEC) – October 9, 2015 Letter (For Letter see Appendix A, Part 2A - Page A-2A-774)</p>	
COMMENT	<p>The New York State Department of State (NYS DOS) and New York State Department of Environmental Conservation (NYS DEC) request that the U.S. Army Corps of Engineers (Corps) extend the comment period for the Draft Dredged Material Management Plan (DMMP) for Long Island Sound (LIS). The draft DMMP is over 1,000 pages in length, and the State and public need more time to review the complex proposals and technical data in the DMMP. Additionally, NYS DOS and NYS DEC request an extension for the final DMMP regulatory deadline to August 2016; this final completion deadline change will afford the Corps additional time to fully examine public comments and suitably revise the DMMP.</p> <p>Specifically, we recommend that the Corps schedule webinars and conference calls with New York government agencies, community leaders and the not-for-profit community, among others, to present the DMMP in more detail and to listen to concerns. A timeline extension will help ensure that key stakeholders are meaningfully engaged, that the billions of State and federal dollars already invested in LIS do not go to waste, and that the original 2005 agreement for a LIS DMMP to "reduce or eliminate" open water dumping can be fulfilled.</p>
RESPONSE	Please see General Response to Public Involvement (0003R).

COMMENT	LIS is a critical environmental, commercial, and recreational resource located along one of the most densely populated areas in the nation. In 1987, Congress recognized the Sound's importance to the nation and designated it an Estuary of National significance.
RESPONSE	Please see General Response to Estuary of National Significance (0015R).
COMMENT	In 2005, New York State, Connecticut, the EPA, and the Corps all agreed to develop a DMMP that would "reduce or eliminate" the need for open water disposal of dredged materials in the Sound. This agreement was embodied in the EPA's 2005 Rule for the Central and Western Long Island Sound disposal sites and New York State has always maintained the position that any draft DMMP must be consistent with this agreement. Our analysis thus far raises significant concerns consistent with those identified in our July 10, 2015 letter regarding the pre-draft DMMP. While 17,878,265 cubic yards of sediment have already been dumped in Long Island Sound in the last 33 years, the Corps projects in the draft DMMP that an additional 34,375,705 cubic yards of sediment will be dumped over the next 30 years.
RESPONSE	Please see the General Response to Eliminate or Phase Out Open-Water Placement (0042R).
COMMENT	The draft DMMP either ignores or fails to address important issues such as the State's opportunity costs, economic losses associated with foregoing more environmentally friendly disposal options, and ecosystem resilience, among others.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	Additionally, the NYS DOS has determined that the DMMP will have reasonably foreseeable effects on uses and resources in New York's coastal area. Because the preparation of a management plan for activities authorized under the Clean Water Act and the Marine Protection, Research, and Sanctuaries Act constitutes a direct federal agency activity, the management plan is thus subject to consistency provisions of both the federal Coastal Zone Management Act (CZMA) and the State's Coastal Management Program (NYCMP). The Corps should submit a consistency determination for the DMMP to NYS DOS in accordance with CZMA implementing regulations in 15 CFR 930 Subpart C, and Part II Section 9 and Table 2a of the NYCMP. That determination must be submitted to NYS DOS at least ninety (90) days prior to a federal agency decision to proceed with publication of the final DMMP. If you have any questions or would like to discuss consistency review matters further, please contact Jeffrey Zappieri at (e-mail Jeffrey.Zappieri@dos.state.ny.us).

RESPONSE	The USACE will not be submitting a CZMA consistency determination for this DMMP to any of the three states. The LIS DMMP does not recommend specific dredged material placement solutions for specific Federal Navigation Project activities, the activities of other Federal agencies, or Federal decisions on the regulated activities of non-Federal parties, nor does it "direct" future agency actions. Rather it is intended to serve as a resource to inform future dredging projects of various alternatives that should be evaluated in developing a recommended plan of action. As such, it does not constitute "a proposal for action," initiating activities where coastal effects are reasonably foreseeable, and therefore is not a "Federal agency activity" as defined in 15 CFR 930.31(a) that would require a CZMA consistency determination. In effect, even though it is called a "plan", the LIS DMMP is more a study or guide providing data and analysis to be considered by future projects, but contains no proposal for Federal action and any determination of reasonably foreseeable coastal effects of future actions would be premature and speculative at the DMMP stage.
COMMENT	The original purpose of a DMMP was and remains the development of a solution that reduces open water dumping.
RESPONSE	Please see the General Response to Eliminate or Phase Out Open-Water Placement (0042R).
COMMENT	Although New York had hoped for a swifter resolution of this challenging issue, we must reluctantly urge an extension to allow the Corps sufficient time to share information on the DMMP and more completely analyze public comments and potential solutions.
RESPONSE	Please see General Response to Public Involvement (0003R).
Connecticut General Assembly – Joint Letter to General Bostick – October 1, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1027)	
COMMENT	We are writing in support of the U. S. Army Corps of Engineers Draft Dredged Material Management Plan (DMMP) and Draft Programmatic Environmental Impact Statement (PEIS) for Long Island Sound.
RESPONSE	The USACE thanks the state of Connecticut for its continued support and partnership in this DMMP.
Connecticut State Representative Fred Camillo, Greenwich, CT Email to NAE – September 30, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1070)	
COMMENT	I fully support the recommendation of the Army Corps of Engineers for continued open-water placement of materials in the four current locations as part of the overall plan. Open-water placement is the least harmful solution for the environment as well as the most economically viable.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
New York State Parks, State Historic Preservation Office Emails to NAE – September 28-30, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-)	
COMMENT	One of SHPO's archaeological reviewers, entered materials related to the Draft DMMP and PEIS for Long Island Sound into CRIS with you as the primary contact. Any submitted materials we receive by mail are entered into CRIS by SHPO staff so that SHPO may track and review them. You received the automatically generated token email that is sent after a project's contacts are entered in the submission process.

	The reviewer signed off on this submission with No Response Needed; he had no comments in response to the Public Notice dated August 14, 2015, or to any of the accompanying materials.
RESPONSE	Thank you for taking the time to review the LIS DMMP documents and provide us with your comments.
Connecticut Office of Policy & Management, Undersecretary Garrett Eucalitto Statement to Public Hearing - September 17, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1467)	
COMMENT	The draft plan under discussion this evening is practical, cost-effective, science-based, and environmentally sound. It concludes that a range of alternatives should remain available for the handling of dredged material, including beach renourishment, wetland restoration, and open water disposal.
RESPONSE	The USACE thanks the state of Connecticut for its continued support and partnership in this DMMP.
COMMENT	Connecticut's management of dredge material has been, and will continue to be, strictly regulated by state and federal agencies. All dredged material slated for disposal at open water sites is subjected to rigorous testing to ensure it meets federal and state standards, and in many cases our state's standards go beyond those required by federal law. Furthermore, thirty-five years of monitoring the open water disposal sites in the Sound shows that open water disposal has no long-term adverse effects on water quality or the ecosystem.
RESPONSE	In the future, any dredged material proposed for open water placement would need to be found suitable through application of the testing process described in the Federal testing manuals, as is currently the case. The DMMP also proposes to continue the DAMOS Program efforts to study and monitor the existing placement sites impacts and recovery, and also recommends that DAMOS examine some of the older historic open water sites to determine if any could benefit from remediation placement of suitable dredged materials.
COMMENT	These projects, as well as those funded by the Corps, are relied upon for recreational boating, ferries, water-borne commerce, as well as significant national security activities related to the local Naval Submarine Base, submarine construction at Electric Boat, and the Coast Guard Academy and other Coast Guard facilities throughout our waters.
RESPONSE	The DMMP recognizes the importance of cost-effective navigational dredging to the Navy's national defense mission and to the USCG.
COMMENT	I want to reassert Connecticut's commitment to a vibrant and healthy Sound. Not only are we spending billions of dollars to upgrade wastewater treatment plants, but we are also making strides to address nonpoint sources of pollution. DEEP is in the process of implementing a new green infrastructure program, as well as, a Long Island Sound stewardship program, to reduce storm water runoff and increase the health of the Sound.
RESPONSE	The DMMP recognizes Connecticut's programs and efforts to limit and manage sediment and contaminant loading and sources within the watersheds of LIS. The DMMP recommends that EPA and the states to continue those efforts.
COMMENT	Again, we strongly support the findings and recommendations of the proposed DMMP and urge its prompt adoption. I thank you for this opportunity to speak here tonight on behalf of the state of Connecticut.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.

New York State Assemblyman Steven Englebright and Others Joint Letter to NAE – September 16, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1556)	
COMMENT	We write today in opposition to the continued open water dumping of dredged material in Long Island Sound and urge rejection of the Army Corps of Engineers draft Dredged Material Management Plan (DMMP).
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	Though the DMMP identifies practicable potential cost-effective and environmentally acceptable placement alternatives to meet the dredging needs of ports and harbors in Connecticut, New York, and Rhode Island, the document fails to advance resolution of the dredge disposal problem by neglecting to factor in the costly environmental impacts of open water dredge disposal to the ecological services provided by the LI Sound's natural systems.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	We acknowledge the necessity of dredging and support the maintenance of harbors, bays, and channels for safe and efficient navigation for commercial and recreational purposes.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	We acknowledge the necessity of dredging and support the maintenance of harbors, bays, and channels for safe and efficient navigation for commercial and recreational purposes.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	While there is a recognized need for dredging in order to maintain navigable waterways, the designations of dredge spoil disposal sites in the Sound and the consequent dumping of sediments, as currently proposed, will degrade the Sound and threaten its environmental resources and economic viability. The recreational boating and fishing activities cited in the Objection to Consistency Determination were identified in the Long Island Sound Study (LISS), founded by the Environmental Protection Agency, New York and Connecticut in 1985, to generate an estimated \$8.5 billion annually.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	A condition of the settlement of this objection was the development of the LIS DMMP with an emphasis on beneficial uses of dredged materials and other alternatives to open water disposal in Long Island Sound. The plan was mandated by New York & Connecticut to be a comprehensive plan to phase out open water disposal of dredged material and establish future protocols for dredged material management.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	Concerns about the Sound's "environmental resources and economic viability" are as relevant today as they were in 2004 when the preparation of a DMMP was being contemplated and deserve a full and thorough analysis. Federal, State, and local governments have invested billions of dollars in research, grants and infrastructure improvements to repair the significant environmental damage of past waste disposal practices to the Sound's natural systems. Stormwater management, nitrogen reduction, and marine habitat restoration are among the highest priorities of governments on both sides of the Sound.

	Yet the DMMP does not comprehensively address the costs of open water disposal to the Sound's ecological systems, the effects on benthic life, the significant nitrogen loading of dredge spoils, how climate change and sea level rise may influence future dredging needs and uses of dredge materials, ocean acidification, and protocols used to control the influx of land sediments into coastal waters.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	These concerns shouldn't simply be ignored or dismissed based on simple arguments such as the dredged materials being subject to testing prior to disposal. Several studies have identified shortcomings in the sediment testing process. For example, in his book Practical Handbook of Estuarine and Marine Pollution, author Dr. Michael J. Kennish, a specialist in estuarine and marine ecology, indicates "Studies have shown that bulk sediment analyses do not predict short or long-term release of contaminants and that no relationship exists between bulk sediment and bioaccumulation. Hence, bulk sediment analyses do not provide an adequate assessment of water quality effects nor any level of environmental protection."
RESPONSE	Please see General Response to Sediment Contamination (0005R).
COMMENT	The water quality of the Long Island Sound directly impacts the millions of people who live along its shores as well as avian and marine species who live in or pass through it. Issues that directly impact that water quality, such as open water placement of dredged materials, merit a thorough analysis and innovative problem-solving that lead to tangible results. The LIS DMMP is just the newest version of the old "out of sight, out of mind" method of waste disposal that has been with us since the dawn of the industrial revolution. Connecticut and New York asked for better and our citizens deserve better.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
Connecticut State Representative Kathleen McCarthy – Letter to NAE September 3, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1823)	
COMMENT	I am writing in support of the proposed Long Island Sound Dredged Material Management Plan, which provides an environmentally sound program for future projects in Connecticut, New York, and Rhode Island. The U.S. Army Corps has put together a thoughtful report after engaging with the three states, agencies, and various groups.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	Dredging activities are necessary to ensure that our waterways remain navigable for security, commercial trade, and pleasure boating.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	The DDMP and PEIS seeks a balance in protecting the natural beauty of Long Island Sound and its ecosystem as well as how to optimize funding for the dredging projects.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.

Connecticut Office of Military Affairs, Robert Ross, Executive Director Statement Submitted at Public Hearing - August 27, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1839)	
COMMENT	<p>Commercial fishing, ferry dependent tourism, and recreational boating are also all significant contributors to Connecticut's maritime economy. Further, Submarine Base New London depends on dredging to maintain access to its facilities, and the General Dynamics Electric Boat Shipyard relies on deepwater access for the construction and delivery of the submarines it constructs. These assets, along with the U.S. Coast Guard Academy and three area Coast Guard stations, are critical strategic elements in our overall national defense and homeland security.</p> <p>Given the important economic and strategic benefits of maintaining access to Connecticut's ports and harbors, the need to assure continued cost-effective and sufficient disposal options for dredge materials is paramount.</p>
RESPONSE	The DMMP recognizes the importance of cost-effective navigational dredging to the Connecticut's economy, its fishing, boating and tourist industry, as well as both the U.S. Navy's national defense mission, and the missions of the U.S. Coast Guard.
COMMENT	The DMMP posits a series of environmentally sound options for the disposal of dredged materials, including the beneficial reuse of such materials for beach and marsh restoration. However, though such reuses should be prioritized, continued access to open water disposal of fine-grained and salt-heavy materials is critical. Positively, the draft DMMP keeps open that option.
RESPONSE	The DMMP identifies many alternatives to open water placement in the various dredging centers and harbors in the region. A commitment by the States to champion and cost-share in implementation of these alternatives is necessary to advance the DMMP's goal of reducing reliance on open water placement in the future.
COMMENT	And let me offer the state's strong support for the recommendations in the draft DMMP.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Connecticut Department of Energy and Environmental Protection Commissioner Robert Klee - Statement to Public Hearing - August 26, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1849)	
COMMENT	We especially appreciate your practical, cost-effective, science-based, and environmentally sound conclusion that a full range of alternatives must continue to remain available for the handling of dredged materials - including beneficial reuse as well as placement at open water sites.
RESPONSE	The USACE looks forward to working with the State of Connecticut and the other DMMP partners to implement the recommendations of the DMMP.
COMMENT	Studies have shown that maritime-related commerce provides nearly \$7 billion in economic output and 40,000 jobs in Connecticut alone. In order to sustain -and grow -this important sector of our economy, dredging projects are necessary to ensure the safe and efficient use of our channels, ports and harbors. These water resources are relied upon for recreational boating, ferries, water-borne commerce including fuel deliveries, and the national security activities of a Naval Submarine Base, submarine construction and repair at Electric Boat, the Coast Guard Academy, and three Coast Guard Stations located on our waters.

RESPONSE	The DMMP recognizes the importance of cost-effective navigational dredging to the Connecticut's economy, its fishing, boating and tourist industry, as well as both the U.S. Navy's national defense mission, and the missions of the U.S. Coast Guard.
COMMENT	The DMMP has done an excellent job of identifying and evaluating traditional and new alternatives for beneficial reuse of these materials -which must be a top priority. In the past several years, for instance, Army Corps navigation projects have pumped sand directly onto Hammonasset State Park Beach in Madison, and additional sandy sediments from both federal and nonfederal projects have been placed nearshore off Hammonasset Beach as well as at Point No Point in Stratford, CT.
RESPONSE	The DMMP recognizes the efforts of the state of Connecticut in recent years to fund the beneficial use of dredged materials, particularly sand used for beach and nearshore bar placement, as contributing to the reduction in reliance on open water placement in LIS.
COMMENT	In the face of more frequent and severe storms resulting from Climate Change, we also envision greater use of suitable sediments for renourishing marshes and sand dunes and other projects designed to protect natural resources, people, property, and infrastructure along our coast. Given the volume of dredged materials that will be excavated in our waters, and the characteristics of it, however, beneficial reuse alone is not a realistic answer to Connecticut's needs. It's simply a matter of geology.
RESPONSE	The DMMP recognizes that beneficial use of dredged materials can play a role in responding to climate change through opportunities to enhance coast resiliency. The DMMP presents many alternatives for beneficial use towards that end for the states to consider.
COMMENT	Given that land availability, transportation, and logistical considerations severely constrain our ability to find other suitable uses for such a large volume of material, continued operation of open water sites -as is recommended in the Draft DMMP -is required to meet Connecticut's needs.
RESPONSE	The various investigations conducted for the DMMP identified only a few opportunities for development of onshore dewatering and processing facilities for dredged material and a high cost for those activities, as well as transportation of dewatered material upland.
COMMENT	Our experience over the past 35 years and all data that has been generated, shows open water disposal to be an environmentally acceptable practice. The evidence clearly shows that through careful oversight and management, open water placement has not diminished water quality, natural resources, aquatic life, or public health in Connecticut or neighboring states.
RESPONSE	The DMMP recommends continuing the DAMOS Program efforts to study and monitor the existing placement sites impacts and recovery as part of the overall site management and monitoring effort in the future.
COMMENT	As has been -and would continue to be the practice -all dredged material slated for disposal at open water sites is subjected to rigorous testing to determine that it meets strict federal and state standards. When materials do not meet these standards they are not taken to an open water site and must be handled in other ways.
RESPONSE	In the future, any dredged material proposed for open water placement would need to be found suitable through application of the testing process described in the Federal testing manuals, as is currently the case.

COMMENT	As an added measure of protection, when appropriate, Connecticut requires placement of cleaner material on top of sediment if it contains concentrations of certain constituents that are found to be present above the background levels at those locations. If you think about it logically you can see that through open water placement we are only moving sediments already in the marine environment to a location where they are more properly managed
RESPONSE	The DMMP recognizes the Connecticut's continued actions to manage dredged material placement in LIS under its Clean Water Act authorities, including the use of sequential dredging and placement as a best management practice at the open water placement sites.
COMMENT	Long Island Sound is Connecticut's most important natural resource. As such, we are investing heavily in its future -through billions of dollars for upgraded wastewater treatment plants, more effective management of storm water runoff, and the development of a 21st century Blue Plan.
RESPONSE	The DMMP recognizes Connecticut's programs and efforts to limit and manage sediment and contaminant loading and sources within the watersheds of LIS. The DMMP recommends that EPA and the states to continue those efforts.
New York State Assemblyman Fred W. Thiele, Jr. – Letter to NAE August 25, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1859)	
COMMENT	I am writing in opposition to the inclusion of any proposed open water disposal or burial of dredged material in the Long Island Sound Draft Dredged Material Management Plan (DMMP).
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	While I do not discount the inherent need to dredge inlets and harbor in both Connecticut and New York waters, I firmly believe that we should not jeopardize the ecological health and productivity of this fragile estuarine ecosystem.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	Any such disposal seems contradictory to the federal "Estuary of National Significance" designation under the United States Environmental Protection Agency's National Estuary Program.
RESPONSE	Please see General Response to Estuary of National Significance (0015R).
COMMENT	The DMMP should focus more efforts on outlining alternative disposal mechanisms, technologies and locations. I urge you to work closely with all levels of government to seek alternative options and abandon all open water disposal and burial of dredged materials.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
New York State Senator Kenneth P. LaValle – Letter to NAE – August 13, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1920)	
COMMENT	As a representative of the First Senatorial District, I am writing in opposition to the United States Army Corps of Engineers' and the United States Environmental Protection Agency's (US EPA) long-term plan to continue to use the Long Island Sound for the open water disposal of dredge spoil.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.

COMMENT	Throughout my tenure, I have worked to put in place policies and programs to protect this vitally important resource. To dump dredge spoil from potentially contaminated sites would do irreparable harm to the Sound. There have been numerous studies that collectively demonstrate pollution, overfishing, and contaminated dredge material disposal have eroded the health of the Long Island Sound over time, thereby reducing its resilience capacity to deal with additional ecological stressors.
RESPONSE	Please see General Response to Sediment Contamination (0005R).
COMMENT	I am also disappointed by the US Army Corps of Engineers' failure to adequately notify the public and other interested parties regarding the pending hearings for the Programmatic Environmental Impact Statement (PEIS) and the Dredge Material Management Plan (DMMP) as local input should be a part of any plan moving forward. The DMMP was first requested by the governors of New York and Connecticut in July 2005. A plan of such environmental importance deserves to be scrutinized by stakeholders and adequate time should be allowed. The 32 day public comment period, which ends on September 18, 2015, should be extended to give stakeholders ample time to read the documents, consider the findings, and respond appropriately.
RESPONSE	Please see General Response to Public Involvement (0003R).
New York State Assemblywoman Michelle Schimel – Letter to NAE August 10, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1927)	
COMMENT	I represent the environmentally pro-active 16th Assembly District, and I am also a member of the New York State Assembly Environmental Conservation Committee. I write to respectfully request the public comment period Draft Dredged Material Management Plan and the Draft Programmatic Environmental Impact Statement for Long Island Sound be extended from 30 days to 120 days and have the public hearings moved to October. I have been working closely with environmental advocacy groups, Citizens Campaign for the Environment, and the Manhasset Bay Protection Committee on this issue. With the release date of these documents being August 17th and public hearings being held a week later, the comment period is simply inadequate. This plan took a decade to prepare and is expected to be about 1,000 pages long. How can we expect the public to make substantive comments on these documents with mere days to review them? The safe navigation, and disposal of dredged material is very important to my district and Long Island. Extending the comment period to 120 days will be a more reasonable time frame to allow sufficient public participation in the review process of this vital plan.
RESPONSE	Please see General Response to Public Involvement (0003R).
Correspondence Received from County and Municipal Agencies and Elected Officials	
Town of North Hempstead, New York – October 16, 2015 Letter (For Letter see Appendix A, Part 2A - Page A-2A-30)	
COMMENT	1. The draft DMMP does not achieve the goal of reducing or eliminating the use of open water disposal, and it does not respond to the spirit or the letter of the 2005 mandate from USEPA and the States of New York and Connecticut. Although the goal to reduce or eliminate the use of open water disposal is quoted in a number of locations throughout the draft DMMP, the document is focused on continuing the status quo with regards to open-water disposal of the majority of dredge spoils.
RESPONSE	Please see the General Response to Eliminate or Phase Out Open-Water Placement (0042R).

COMMENT	a. The draft DMMP does not consider the economic losses associated with not pursuing beneficial re-use.
RESPONSE	The economic, societal, and environmental impacts of beneficial use projects for dredged material are measured as the benefit of using the material in those manners, as compared to the incremental cost of implementing such projects in excess of the costs that would occur with the Federal Base Plan, if that is different. Beneficial uses are warranted and justified only if the incremental cost of their design, construction and future maintenance is outweighed by their beneficial impacts. Allocating the benefits of beneficial use alternatives as costs to other plans would be an inappropriate comparison of their relative merits. The benefits of any specific beneficial use alternative can only be determined when evaluated as a placement option for a particular dredging project at the time the project is funded for implementation. Each dredging project and each beneficial use alternative must be evaluated specifically and separately including the willingness of non-Federal partners to participate financially in each proposed project.
COMMENT	[The DMMP does not] provide any guidance regarding the reduction of sediment deposition into surface water bodies, as the Army Corps was requested to do.
RESPONSE	Please see General Response to Sediment Reduction Efforts (0009R).
COMMENT	b. The draft DMMP does not consider the ecosystem and financial costs that will be incurred by continued open water dumping. The communities around the Long Island Sound have expended countless resources to rehabilitate and improve Long Island Sound. Yet, we still have along road ahead of us, and the Sound's long history of pollution, overfishing and contaminated dredged material disposal have compromised the Sound's health and resiliency. Continued open water dumping may have long-term impacts to the ecosystem of Long Island Sound, and thus to our regional economies; yet the draft DMMP does not attempt to quantify these costs or discuss them in an informed fashion.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	Section 5.18 of the main report covers the Manhasset and Little Neck Bays Area Dredging Center. In this section (specifically page 5-256), the DMMP states that these two bays (Little Neck Bay and Manhasset Bay) would "generate suitable mixed sandy and fine-grained dredged material" for open water placement; however, it is unlikely that sediment dredged from Manhasset Bay would be environmentally acceptable to dump at an ocean site, as this has been the case in recent dredging projects where alternatives had to be found. As Manhasset Bay is lumped in with Little Neck Bay, it is difficult to parse out exact quantities and qualities in the DMMP for further comment.

RESPONSE	<p>Only very limited, and often dated, information on dredged material quality was available from NY harbors. The USACE does not regulate upland placement of dredged material unless wetlands are impacted, and only limited data was made available by state agencies. As projects in these two areas have not proposed using open water placement, recent testing has not even examined its potential use. State testing protocols for upland placement are typically more restrictive than for open water placement due to the proximity of upland sites to human habitation, ground water, and other land uses. Also, most harbors immediately across the Sound in Westchester and Fairfield Counties with similar uses and facilities typically test as suitable for open water placement. Absent USACE Opportunity to examine the data you reference, the USACE believes that testing using the protocols for ocean placement would show most materials from these two bays to be likely suitable for open water placement. We note that future projects could examine the suitability of open water placement through appropriate sampling and testing if they so chose. Text to this effect has been added to DMMP Section 5.18.2. As Manhasset and Little Neck Bays are in the same dredging center, information on non-Federal projects was aggregated so that individual survey respondents could not be identified, in keeping with the confidentiality requirements of Federal surveys of the general public and private parties. Text to this effect has been added to DMMP Section 5.18.4.</p>
COMMENT	<p>The plan states that materials from Hempstead Harbor are assumed to be a mix of sandy and fine- grained materials that would not be suitable for direct beach placement with the least costly disposal being the Western Long Island Sound disposal site. However, it notes that the two most recent non- federal dredging projects next to the federal channel (1999 and 2004) showed that the dredged material was suitable for upland placement as beach nourishment and marsh restoration. It also mentions that the most recent grain size analysis performed in 1982 showed that the harbor sediment was mostly sand (78.6%) with silt (16.7%) and clay (5.1%). Despite this, the report takes the position that taken as a whole, the sediments show mixed results and are therefore assumed to be too fine- grained for beach placement. As such the Federal Base Plan calls for dredged materials from Hempstead Harbor to be disposed of through open water disposal at the Western Long Island Disposal Site (off of Norwalk Harbor). This overly conservative approach would all-but rule out beneficial use of this material.</p>
RESPONSE	<p>Given the limited data available, the assumptions for the Hempstead Harbor FNP relied on the breakdown of the 1982 sample, which were more than 20% fines, in excess of what is typically approved for direct beach placement. There were no indications in the records whether material in one area of the channel was more or less sandy than from another area. The report has been revised to state in Section 5.19 that "It is unlikely that any materials from the FNPs in this dredging center, even entrance channel materials, would be found sandy enough to make them suitable for direct beach placement, though testing for specific projects may prove suitable for nearshore bar placement. Other non-Federal projects in the dredging center may however produce some amount of material suitable for beach nourishment. This is a summary of the information already in the draft text of Section 5.19.2 and the revised text in Section 5.19.4 which states "Based on more recent permit data for non-Federal projects, and information provided by the Town of North Hempstead in their letter of October 16, 2015, some amount of the material dredged from non-Federal projects may be sandy material suitable for beach or bar placement. For purposes of this DMMP it is assumed that 50 percent of the future non-Federal material may meet these requirements." Tables 5-185 and 4-1 have been so revised as well, and additional sandy material alternatives have been added to Table 5-186.</p>

COMMENT	The plan notes that a "Confined Disposal Facility" (or "CDF") has been proposed "at Hempstead Harbor along the southwest shoreline...at a former sand mining company site that could accommodate the needs of other harbors in the western sound with its 2.8 million CY capacity". When analyzing the costs for disposal of sediments from Hempstead Harbor, it determined that it would be significantly less expensive to dispose of the dredged material at the Western Long Island Sound Disposal Site (\$32/CY) than it would be to use the CDF at Hempstead Harbor (\$94/CY). This seems to defy common sense. If it is not economical for a dredging project immediately adjacent to a CDF to use the CDF, then it is hard to imagine that any CDFs would be economical. Further details on the cost calculations are needed.
RESPONSE	The costs of using disposal facilities, such as CDFs and CAD cells include the costs of constructing, operating, and ultimately closing and monitoring those facilities, spread out over their capacity to accept material. It is not surprising that the cost of dredging, plus the cost of re-handling material into a facility, plus the proportionate unit cost of using the facility's capacity, would exceed the cost of dredging and hauling the material to an open water site within a reasonable distance. That is why CDFs are typically only used to receive materials that are unsuitable for open water placement or where open water sites are located a significant distance away from the dredging site v. the CDF. Should state and local interests decide to pursue a CDF in Hempstead Harbor, then site specific studies and estimates for the site's implementation would show what the actual costs and impacts of such a facility were, and what the cost for placement of materials into that facility would be.
Town of Oyster Bay, New York – October 16, 2015 Letter (For Letter see Appendix A, Part 2A - Page A-2A-70)	
COMMENT	1. The DMMP/PEIS identifies continued use of the Long Island Sound disposal sites as the "least cost environmentally acceptable plan" for the vast majority of the projects in the study area. However, the criteria by which the determination has been arrived at that this method of disposal is "environmentally acceptable" is not clearly and concisely explained. Although technical details factoring into this conclusion may be complex, it is important that the basis for decision-making be presented in a manner that can be readily understood by the public, a standard which all EISs are required to meet and in our opinion has not been accomplished in this case.
RESPONSE	Under the Federal Standard (Section 1.3.6 of the DMMP) a placement alternative is considered environmentally acceptable by the Federal agencies if there are no identifiable long term adverse environmental impacts from its use. That requires an analysis of both the site and the materials proposed to be placed at the site, under the requirements of the MPRSA, the CWA, and other statutes and regulations. In its 2004 FEIS for the designation of dredged material placement sites in LIS the EPA concluded that continued use of these sites, consistent with the requirements for sediment testing and suitability, site management and future monitoring, was environmentally acceptable. The more than three decades of research by the USACE under its DAMOS program, and by the EPA and other agencies has confirmed and supported this assessment. Federal law requires the identification, use and management of the sites be determined in accordance principally with the standards proscribed by the MPRSA, the standards used in the 2004 FEIS.

COMMENT	2. The proposed action does not discernably advance the stated goal of "reducing or eliminating open-water placement of dredged material in the waters of Long Island Sound wherever practicable." Although various measures are discussed generically as possible means that could reduce the use of the Sound for dredged material disposal, no real plan is presented to identify and explain actions that are actually intended to be undertaken, with specific target dates, to attain that goal.
RESPONSE	Please see the General Response to Eliminate or Phase Out Open-Water Placement (0042R).
COMMENT	3. The DMMP/PEIS will require review and/or approval by a number of federal and state agencies. One key approval is the issuance of a coastal consistency concurrence by the New York State Department of State (NYSDOS) with respect to the New York State Coastal Management Program (CMP). It is difficult to see how such concurrence is possible given that NYSDOS already has determined, by correspondence dated June 3, 2004 to the EPA Region I Office of Ecosystem Protection, that use of the Central Long Island Sound and Western Long Island Sound sites for the open-water disposal of dredged materials is inconsistent with the NYS CMP. The DMMP/PEIS does not appear to address the numerous, specific objections raised in NYSDOS' s June 3, 2004 determination of non-consistency. Therefore, it seems unavoidable to conclude that the DMMP/PEIS entails significant, unmitigated adverse impacts with respect to implementation of the NYS CMP and, therefore, that the DMMP/PEIS is un-approvable on its face.
RESPONSE	The USACE will not be submitting a CZMA consistency determination for this DMMP to any of the three states. The LIS DMMP does not recommend specific dredged material placement solutions for specific Federal Navigation Project activities, the activities of other Federal agencies, or Federal decisions on the regulated activities of non-Federal parties, nor does it "direct" future agency actions. Rather it is intended to serve as a resource to inform future dredging projects of various alternatives that should be evaluated in developing a recommended plan of action. As such, it does not constitute "a proposal for action," initiating activities where coastal effects are reasonably foreseeable, and therefore is not a "Federal agency activity" as defined in 15 CFR 930.31(a) that would require a CZMA consistency determination. In effect, even though it is called a "plan", the LIS DMMP is more a study or guide providing data and analysis to be considered by future projects, but contains no proposal for Federal action and any determination of reasonably foreseeable coastal effects of future actions would be premature and speculative at the DMMP stage.
COMMENT	4. The DMMP/PEIS states that upon completion of the plan, the EPA will determine whether use of Long Island Sound for open-water disposal will be allowed to continue and, if so, what conditions will be applied. Any such conditions should be specifically identified and defined as part of the DMMP/PEIS so that their mitigative value can be properly assessed and disclosed within the framework of the public review process.
RESPONSE	The EPA modified rule would be subject to its own public review process, including public notice, hearing/meetings and opportunity to comment.

COMMENT	5. The benefit component of the DMMP/PEIS's cost-benefit analysis presents dollar values related to all navigation-dependent activities in the region, seeming to imply that dredging is linked to every dollar generated by the marine industry. However, not all marine activity necessarily relies on dredged waterway access. A more equitable approach would seek to refine the analysis to limit the statement of economic benefit only to that portion of the marine industry which actually is dependent upon dredging.
RESPONSE	The majority of the marine industry and economy (marinas, boat yards, power plants, ferry companies, cargo terminals, Federal facilities and their contractors) are directly linked to dredging for navigational access. While most of these activities would not cease if open water placement sites were unavailable, they would be severely constrained economically as dredging prices increased. Some business and activities would fail, others would adapt to higher costs and pass those costs along to consumers, and many would fall in the middle. Some water dependent property uses would be converted to non-water dependent land uses. Section 1.2.3 of the DMMP has been edited to reflect the range of responses of the marine industries to reductions in open water placement and higher dredging costs.
COMMENT	6. It is stated that it is not the purpose of the DMMP/PEIS to perform a site-specific analysis or to make decisions about how dredged material generated by any given project should be disposed, and that each project will be required to undergo site-specific investigations, including evaluation of economic justification and environmental acceptability. However, it is reasonable to assume that a project sponsor can readily point to the DMMP/PEIS's default conclusion that, in most cases, open-water disposal in Long Island Sound has already been determined to be the "least cost environmentally acceptable plan" (emphasis added). Furthermore, even if it is truly intended that a meaningful site-specific analysis, including a comprehensive review of disposal alternatives, will be required in each case, the DMMP/PEIS does not appear to specify the procedural and technical requirements for such supplemental reviews in order to ensure that these future evaluations serve as more than a mere rubber stamp for the DMMP/PEIS's endorsement of open-water disposal in Long Island Sound.
RESPONSE	The DMMP recommendations (Chapter 7) describe the procedures and standards for implementing the DMMP recommendation including continuation of the interstate interagency Regional Dredging Team, to review the alternatives analysis for future projects, champion and seek funding to pursue non-open water placement options such as beneficial use projects, and recommend additional investigations of long term disposal impacts. In addition, the Federal NEPA process and state regulatory processes all include opportunities for public involvement. The recommendations also include continuing the technical working group established for the DMMP, including agencies, universities and public interest groups, to assist in framing the technical debate and analysis of proposed beneficial use projects and other alternatives.
<p align="center">Town of Greenwich, CT, Department of Parks and Recreation Letter to NAE – October 15, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-108)</p>	
COMMENT	Maintenance dredging of our navigable waters is paramount to the existence of the marine industry, especially in the State of Connecticut. It affects all aspects of the marine trades as well as the many other industries that support and rely on the marine trades.
RESPONSE	Please see General Response to Dredging Economy (0006R).

COMMENT	<p>The Federal government is tasked with identifying the most economical and environmentally feasible methods for maintaining navigable waterways. After 10 years of study and a cost of \$15 million dollars, we now have a scientifically backed Dredge Material Management Plan for Long Island Sound.</p> <p>This plan includes the continued use of open water placement sites for material which has been tested and is environmentally compatible. In fact most of today's dredge material has been found suitable for open water placement following extensive testing.</p>
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	No Action on this Plan will result in astronomical dredging costs and the closure of the Long Island Sound open water placement locations. These closures will in turn result in fewer maintained ports and harbors. Economically feasible dredging insures continued maritime commerce, as well as occupational and recreational opportunities for residents and visitors to this State.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	I believe that access to these open water placement sites must be preserved to provide economically viable dredge placement solutions.
RESPONSE	Please see General Response to Availability of Open Water Alternatives (0041R).
Town of Greenwich, CT, Shellfish Commission – Letter to NAE – October 15, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-110)	
COMMENT	As a member of the Town Shellfish Commission navigational access to shellfish beds is important. Dredging is critical to ensure that additional silting does not continue to damage these areas by being delayed any further. The dredging itself will not harm Shellfish beds in fact it will improve their health on the longer terms basis.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	This scientific plan clearly shows that open-water disposal to be the most cost - effective and environmentally compatible method of placement without adversely affecting Long Island Sound for the majority of dredge material. We believe access to these placement sites must, therefore, be preserved to provide economically viable dredge solutions. Connecticut, out of the three subject states, clearly has the greatest dredge need and I fully support the U.S. Army Corps of Engineer's recommendation for continued open-water placement in the four current locations as part of the overall plan.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Town of Guilford, CT, Marina Commission – Letter to NAE – October 13, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-299)	
COMMENT	<p>The undersigned, all Guilford CT Marina Commission members and staff support the proposed DMMP Update advanced by the Army Corps of Engineers.</p> <p>We realized that the determination of this proposal will affect not only small communities like Guilford but also large cities like New London, New Haven and Bridgeport on this side of Long Island Sound.</p>
RESPONSE	Thank you for your support of the Long Island Sound DMMP.

Town of East Lyme, CT, Harbor Management & Shellfish Commission Letter to NAE – October 10, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-753)	
COMMENT	I am writing on behalf of the East Lyme Harbor Management/Shellfish Commission to express our support for the Dredged Material Management Plan (DMMP) recently released by your agency.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	The slated closing date of December 2016 would adversely affect our local marine activities and navigability in the Niantic river. These two closings will create a hardship to many local marine businesses including commercial and charter fishing, and access to local marinas. It will create safety a hazard along the federal navigational channel including the increase likelihood of groundings, which could endanger human lives.
RESPONSE	Please see General Response to Availability of Open-Water Alternatives (0041R)
COMMENT	The current disposal sites, are highly regulated and have more than adequate monitoring to ensure that the dumping is contained, that there water quality is maintained and that there is minimal impact to surrounding marine life.
RESPONSE	See General Response for Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	Closure of the current sites will severely impact the ability our town to maintain public access to one of the most pristine waterways in the state of Connecticut.
RESPONSE	Please see General Response to Availability of Open-Water Alternatives (0041R)
COMMENT	The needs of our local community, both economic and environmental, are met with this plan.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Nassau County Legislator Delia DeRiggi-Whitton, NY – Letter to NAE October 8, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-795)	
COMMENT	Thus I was anticipating the findings of the new DMMP pointing the way a future where the Sound is not used as a dumping ground.
RESPONSE	Please see General Response to Sediment Contamination and Dredged Material Sampling and Testing (0005R)
COMMENT	The DMMP does not achieve its goal of phasing out open-water placement as was the charge given to the Corps in 2005. Instead, it increases potential projects and cubic yards over the next 30 years. The Corps spends a great deal of time justifying this failure as being statutory unachievable. However, though the Corp may be required to do projects in the most economical way, this 10 year, multi-million dollar study could have pointed out what changes and actions were needed to begin to move away from open water disposal.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	I found the DMMP as presented to be a disappointment. More work needs to be done to bring this document to achieve its goal.
RESPONSE	Thank you for taking the time to review the LIS DMMP documents and provide us with your comments.

Town of Greenwich, Police Dept (James Heavy, Chief) – Letter to NAE October 8, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-806)	
COMMENT	As the Chief of Police for the Town of Greenwich Connecticut, I am writing to express my support for the Dredged Material Management Plan (DMMP) recently released by your agency. The evidence that has been presented has identified the most fiscally and environmentally-suitable means for managing dredged materials for the future.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	<p>As the Chief Law Enforcement Officer for the Town of Greenwich, I am greatly concerned for the safety of our boating community, and the hazards caused due to the silting in our harbors and navigational channels. The Town of Greenwich has three harbors -Byram River/Port Chester, Greenwich, and Cos Cob that are served by federal navigation channels authorized by the U.S. Congress. All three are vital to safe passage and free navigation,</p> <p>Two of our harbors, Greenwich and Cos Cob, have become so restricted due to silting that vessels have bottomed out (grounded) and others have narrowly avoided collision. This safety concern is due to a lack of depth and width of the channels caused by many years of silt buildup.</p> <p>The Town of Greenwich owns and operates three ferry boats out of Greenwich Harbor which service two Town-owned recreational islands, Captains Island (Island Beach) and Great Captains Island. Both are located within Captains Harbor approximately one to one and a half miles off shore. The ferryboats transport approximately 45,000 people a year during season. The largest ferry can accommodate 294 passengers. The boat captains have complained of near misses (collisions) with other boaters for years. They state that due to the reduced depth of the Federal Channel, they, as well as other craft, are limited in their ability to maneuver, which causes life-safety issues.</p> <p>Cos Cob Harbor also poses the same collision dangers as Greenwich Harbor. This is due to extreme silting of the Federal channel which reduces the width and depth to operate safely. This harbor is home to five high school rowing clubs in addition to other rowing clubs resulting in hundreds of individuals utilizing the same waters as recreational and commercial vessel operators. Vessels colliding are not the only danger; additionally, the possibility of collision exists between vessels and the bridge piers that support both the Metro North Train Bridge and the 1-95 Bridge that span Cos Cob Harbor.</p>
RESPONSE	Thank you for reviewing the DMMP/PEIS. The USACE understands your navigation safety concerns.
COMMENT	As the Chief of Police responsible for the safety of our community and guests, I strongly lend my support to the DMMP Study.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Town of Guilford, CT, Marina Comm'n (Roger Celesk) – Email to NAE – Oct 7, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-860)	
COMMENT	I am writing to you today in support of your DMMP study. As a boater and marina commission member, I believe that these 4 open-water placement sites need to be maintained and kept open. Connecticut, out of the three subject States in this study, has the greatest dredge need.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.

COMMENT	The existing open-water placement locations, Western, Central, Cornfield Shoals and New London have all proven to provide the most economically viable placement locations for the projects from their geographic regions without adversely affecting Long Island Sound.
RESPONSE	Please see General Response to Availability of Open Water Alternatives (0041R).
COMMENT	Failure to act on this Plan will result in skyrocketing dredging costs for all who must dredge, the closure of the LIS open-water placement locations within a year's time, fewer maintained ports and harbors, and significant reduction in access, all of which will substantially impair the regional economy.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	We must keep access to all Connecticut waterways open for the State's economic health, private, commercial, and government.
RESPONSE	Please see General Response to Dredging Economy (0006R).
Suffolk County Planning Commission, NY – Letter to NAE – October 7, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-870)	
COMMENT	The Long Island Sound is an Estuary of National Significance, contributing \$17-36 million to our regional economy annually. Eight million people live within 50 miles of the Sound's shores. The Sound is home to more than 120 species of finfish and countless varieties of birds and other animals. Between New York and Connecticut, the Sound's coastline stretches more than 600 miles. The federal government, the states of New York and Connecticut, and local municipalities have spent millions of dollars to protect and restore the Sound. While we support dredging and safe navigation, we do not believe it should come at the expense of federal and local efforts to protect and restore the Sound.
RESPONSE	Please see General Response to Estuary of National Significance (0015R).
COMMENT	The Army Corps was mandated by New York, Connecticut, and the EPA, to create a blueprint, the DMMP, to phase out open water dumping in the Sound while providing guidance and tools for a robust beneficial re-use program. It was clearly stated in a 2005 letter co-signed by the Governors of New York and Connecticut that the DMMP's mandate, "would identify feasible and environmentally sound alternatives and establish future protocols for dredged material management. These alternatives include, but are not limited to, reducing sediment sources, reducing contaminate loading, and developing feasible beneficial reuses for dredged material, with the goal of reducing or eliminating the need for open water disposal."
RESPONSE	Please see the General Response to Eliminate or Phase Out Open-Water Placement (0042R).
COMMENT	Instead, the document released by the Army Corps of Engineers is a long term plan to continue using our Long Island Sound as the primary waste disposal plan for dredged materials. An estimated 17 million cubic yards of dredged material has already been dumped in Long Island Sound. This plan seeks to allow an additional 30-50 million cubic yards to be dumped over the next 30 years. The DMMP does not fulfill the mandate set forth in the agreement signed in 2005.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	The evaluations in the draft DMMP and the accompanying Programmatic EIS, assign value in the decision making process only to the cost of beneficial reuse options and omit any and all value to beneficial re-use as a function in protecting the Long Island Sound.

RESPONSE	Please see General Response to Benefits of and Value Assigned to Beneficial Use Alternatives (0084R)
COMMENT	It appears the draft DMMP neglects to assign any value to environmental consequences attributable to open water disposal. In fact, it seems that the document is based on the false premise that open water disposal is environmentally benign. By emphasizing only the short-term costs instead of long-term solutions, the Army Corps fails to live up to the 2005 agreement.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	The DMMP appears to be inconsistent with prior federal and local efforts to preserve the LI Sound. The Suffolk County Planning Commission notes that Long Island Sound has been named a Federal Estuary of National Significance, which designation was made to provide for enhanced environmental protection. The Commission also notes the millions of dollars provided in part by Federal funds (congressional appropriations from both sides of the Sound) to establish the Long Island Sound Study and provide for enhanced protection and rehabilitation of the Sound, along with the massive infrastructure investments and cooperative efforts of New York and Connecticut to reduce nitrogen impacts and other pollutants on the resource. Suffolk County itself has spent millions of dollars to protect the water quality of the Sound. The DMMP is inconsistent with and a retreat from these efforts to enhance protection.
RESPONSE	Please see the General Responses to Sediment Contamination (0005R) and Site Management and Monitoring Plans (SMMPs) for Open Water Placement Sites (0302R)
COMMENT	New York no longer allows the disposal practices set forth in the DMMP. Dredging and spoil disposal is heavily regulated in New York by the ACE and NYSDEC. New York's spoil disposal practices differ significantly from those proposed in the DMMP. Suffolk County no longer dumps spoil in open water due to recognized environmental harm and recognition of the less than effective modes of dumping into borrow pits. Suffolk County accepts increased costs from upland disposal of poor spoil. The DMMP would however turn back the clock and allow practices that New York rejects, and accept dangers that New York and Suffolk County no longer wish to face.
RESPONSE	The States of New York and Connecticut and the Federal government have regulatory authority over dredging and placement of dredged material. In order to be considered for placement of dredged material into a marine environment, the dredged material must undergo rigorous testing that indicates that the dredged material is suitable for placement at a marine site. There is no regulatory prohibition of placement of dredged material in a marine environment but rather the requirement to seek and receive approval from the appropriate regulatory agencies for that placement. All of the regulatory agencies that oversee Long Island Sound have procedures in place that would allow for the placement of dredged material in a marine environment.

COMMENT	Suffolk County has labeled water quality as a top priority and has declared Nitrogen pollution as "public enemy number one". Sewage Treatment Plants, discharging into the Sound, have been upgraded to reduce harmful Nitrogen and to meet the federal mandate to reduce Nitrogen into the Sound by 58.5%. Suffolk County is currently evaluating advanced on- site septic systems that would reduce nitrogen from homeowner septic systems. The Planning Commission has also issued guidance documents to help encourage the use of Green Infrastructure and reduce polluted run-off from entering the Sound. All these efforts are countermanded if we allow continued open water dumping in Long Island Sound.
RESPONSE	Please see the General Response to Nitrogen Loading (0153R)
COMMENT	The Planning Commission is also very concerned that the draft DDMP and PEIS fail to comprehensively evaluate the addition of Nitrogen into the Sound from the dumping of dredged material. In section 4.6 of the PEIS, USA CE acknowledges the role that excess nitrogen plays in the deterioration of the Sound's water quality and the growth of harmful algal blooms that lead to hypoxia. However, the document fails to articulate how much nitrogen is added to the Sound based on their disposal plan of 30-50 million cubic yards of dredged material.
RESPONSE	Please see the General Response to Nitrogen Loading (0153R)
COMMENT	Studies elsewhere show that dumping of dredged material has increased the release of Nitrogen and Phosphorus into the affected waterways. A 1.5 million cubic yard dredging project in Baltimore Harbor, which is slated for disposal at a cove south of the downtown, is estimated to have the potential to put more than 200,000 lbs of nitrogen back into the water annually. Due to this increase in Nitrogen to an already impaired waterway, state regulators are mandated to offset that Nitrogen. Cooperating together, both New York and Connecticut have been successful in reducing Nitrogen inputs from STPs significantly. This progress should not be hindered by a plan to increase dumping of dredged material in the Sound.
RESPONSE	Please see the General Response to Nitrogen Loading (0153R)
COMMENT	The Suffolk County Planning Commission is concerned that the contaminants in the dredged material will degrade water quality in the Sound, and cause undue harm to recreational and commercial fishing and lobstering in the Sound. The Planning Commission's role is to set forth a path of sustainability and growth for Suffolk County. That sustainability and growth requires a healthy and productive Long Island Sound estuarine system. According to the PEIS, contaminants have already been found within and around the disposal sites, including elevated PCBs in fish and elevated copper in lobsters. The Army Corps fails to address how dumping 30-50 million cubic yards of additional sediment will not add to the contamination.
RESPONSE	Please see General Response to Sediment Contamination (0005R).
COMMENT	The letter signed by the Governors of New York and Connecticut states, "Alternatives should include, but are not limited to, reducing sediment sources, reducing contaminate loading ... " Nowhere in the document does the Army Corp discuss ways to reduce sediment loading and contaminants in our rivers, harbors, and bays. This should have been included in a comprehensive plan that focused on phasing out open water dumping of dredged material.

RESPONSE	Although the 2005 letter from the Governors of New York and Connecticut requested a DMMP focused, among other matters, on the reduction of sediment and contaminant loading, the USACE responded to their letters stating that evaluating the reduction in sediment sources and contaminant loading are beyond the scope that can be funded as part of the USACE DMMP. Thus the states were given the option to provide non-Federal funding to perform these studies, or to perform these studies themselves. The states and EPA decided to work together to gather the necessary information and prepare a report on these issues. The information provided in this DMMP on sediment and contamination reduction is from the report provided by EPA and the states which is included in the appendix to the DMMP.
Town of Southold, NY – 2 Letters to NAE – October 5, 2015 - Letter #1 (For Letter see Appendix A, Part 2A - Page A-2A-922)	
COMMENT	The document fails to take a hard look at the potential economic impacts from all alternatives and subjectively dismisses the other identified alternatives in the analysis.
RESPONSE	Please see General Response for Benefits of and Value Assigned to Beneficial Use Alternatives (0084R).
COMMENT	The below statement links the No Action Alternative with the blanket cessation of dredging in the study area. We believe that this statement and hence, the analysis is incorrect; the purpose of the DMMP and PEIS is to attempt to identify alternatives to the open water placement of dredge spoil from federal and non-federal navigation projects. "For the purposes of this analysis, the No Action Alternative is a "no open water disposal" scenario. The analysis assumes that the lack of open water disposal sites precludes dredging within the study area. The resulting increase in shoaling is assumed to curtail navigation-dependent economic activity in harbors and waterways along LIS." Will all dredging discontinue if an open water disposal site in Long Island Sound is not identified as acceptable?
RESPONSE	Please see General Response for Navigational Safety (0077R).
Town of Southold, NY – 2 Letters to NAE – October 5, 2015 - Letter #2 (For Letter see Appendix A, Part 2A - Page A-2A-923)	
COMMENT	A dredged material transportation and placement cost matrix was developed by the USACE and its contractors to enable cost comparison of the alternatives evaluated. Answers to the following questions are necessary to fully assess the costs of alternatives: 1. Does the assessment calculate potential costs for remediation in the event that significant adverse environmental impacts occur that were unexpected or not identified?
RESPONSE	As open water placement under today's stringent requirements for sampling and testing in support of suitability determinations is expected to ensure that no significant adverse impact will result from continued open water placement the USACE does not believe there is or will be any need to remediate. If it is shown that past placement activities, in particular pre-NEPA activities, could benefit from remediation then future dredged material could be used to achieve that remediation. Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	2. How would remediation be accomplished at each site in the event of failure?
RESPONSE	Please see the response to the above listed comment.

COMMENT	A total of 2,175,200 cu yards of dredge spoil was calculated for Little and Great Peconic bays and Fishers Island (Page 2-22 Table 2-4). In the Peconic Bay most dredge material is used for beach nourishment, placed above the high tide line. The Town is not aware of the need to dispose of the dredge material outside of the Peconic Bay watershed and therefore, it is perplexing that the study includes dredge spoil from Peconic Bay Projects. This creates a false needs assessment.
RESPONSE	The evaluation includes all projected dredged material needs including sandy material most commonly placed as beach nourishment.
COMMENT	1. What is the sampling protocol of the sediments from non-federal facilities?
RESPONSE	The protocols for the testing of sediments to be dredged vary by the range of placement alternatives being considered. The Regional Implementation Manual (RIM) presents sediment testing guidelines and reporting requirements for sediments that will be placed in such a way as to constitute a discharge or fill into a waterway (i.e, open water disposal, nearshore disposal, beach nourishment, confined disposal facility, wetland restoration, etc.). It provides New England-specific guidance on permit application and coordination requirements; sampling methodologies; updated reference site locations; contaminants of concern and analytical reporting limits; and species and test conditions for biological testing. The RIM is intended to be used in conjunction with the national guidance found in the Ocean Testing Manual and the Inland Testing Manual Non-federal facilities would additionally have to comply with their state specific regulatory agency testing requirements.
COMMENT	2. Are the federal and non-federal sediment testing protocol established and comparable?
RESPONSE	Yes, the guidelines in the Regional Implementation Manual apply to both federal and non-federal projects.
COMMENT	3. What are the quality control measures on testing of non-federal sediments?
RESPONSE	The Regional Implementation Manual requires that all laboratories that submit data have an accepted Laboratory Quality Assurance Plan (LQAP).
COMMENT	4. What are the costs to the private, nonfederal actions in the event that remediation is necessary?
RESPONSE	Costs for remediation in non-federal actions are a 100% non-federal responsibility.
COMMENT	5. Is a substantial remediation bond and/or, impact fees required from private (non-federal) operations?
RESPONSE	The magnitude of the non-federal action would dictate the need for bonding or mitigation. As noted above, costs for remediation in non-federal actions are a 100% non-federal responsibility.
COMMENT	The statement "that most recent testing occurred decades ago and may not reflect current conditions" is concerning in that the impact assessment of some areas does not reflect current conditions. 1. How can a discussion on cumulative impacts be made if such pertinent information on suitability of material is outdated and/or unknown?
RESPONSE	Please see General Responses to Sediment Contamination (0005R) and Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	2. How can the claim of approximately 6% of total "unsuitable" material for open water disposal be made?

RESPONSE	For the purpose of the DMMP, the material projected to be dredged was classified based upon historic sampling and testing data. The 6% value was derived from using these classifications. For future project-specific dredging, materials would be tested to verify that they are suitable/unsuitable prior to making decisions regarding placement.
COMMENT	3. How can the integrity of the PEIS be intact and a finding be drafted with such pertinent information missing? Information obtained decades ago should be discounted.
RESPONSE	The DMMP/PEIS are meant to be guidance documents, not decision documents. When a specific dredging project is funded, a NEPA document would be prepared and sampling and testing would be performed to determine the most cost effective and environmentally acceptable alternative for placement of that material.
COMMENT	1. What number of species that occur in the Long Island Sound have been exposed to control materials? Is there a list of "test animals"?
RESPONSE	The 'test animals' in question are benthic macroinvertebrates such as snails, worms, etc. The number and variety of species included in any given test sample would correlate to what was collected during the benthic sampling.
COMMENT	2. Have marine mammals been exposed to the toxicity tests and evaluated?
RESPONSE	No marine mammals have been used in toxicity testing.
COMMENT	<p>3. The discussion on the potential impacts on the American Lobster is deficient in the PEIS. The PEIS identifies that lobsters for testing were harvested in the year 2000; fifteen years ago (page 4-60).</p> <p>The document indicates that Lobsters, in particular, have been susceptible to multiple stressors within the Long Island Sound ecosystem. The fundamental shifts in the ecosystem, together with the persistent freshening, warming, hypoxia, and ongoing pollution, all likely have and will continue to impact the lobster populations (Varekamp, et al., 2010). Relative to these ongoing stressors, dredging-related impacts are not expected to be significant.</p> <p>This statement contradicts the discussion in the document.</p> <p>4. Has there been current in depth scientific analysis on the effect of open water dredge spoil on the species?</p>
RESPONSE	Through a thorough review of collected data, consultations with the USEPA, and consultations with state regulators, the DAMOS Program has worked to strike a balance between collecting sufficient data to identify and understand the impacts associated with aquatic placement of dredged material and not repeating the same types of studies over and over once a process is well understood. As discussed in Chapter 5, the available scientific literature, based on years of monitoring at disposal sites similar to those proposed, indicates that the potential for long-term impacts to wildlife in Long Island Sound as the result of dredged material disposal is minimal. Section 5.2 of the PEIS summarizes the potential effects that have been associated with disposal; the majority of these effects have been shown to be temporary in nature and to not affect the long-term health of the ecosystem.
COMMENT	5. It is concerning that the USEPA Evaluation of Dredged Material Proposed For Discharge in Waters of the U.S. - Testing Manual - Inland Testing Manual was created in 1998 and is 17 years old. Were these manuals used for testing?

RESPONSE	The Regional Implementation Manual (RIM), recently updated in January 2013, presents sediment testing guidelines and reporting requirements for sediments that will be placed in such a way as to constitute a discharge or fill into a waterway (i.e, open water disposal, nearshore disposal, beach nourishment, confined disposal facility, wetland restoration, etc.). It provides New England-specific guidance on permit application and coordination requirements; sampling methodologies; updated reference site locations; contaminants of concern and analytical reporting limits; and species and test conditions for biological testing.
COMMENT	1. The above narrative specifies an "unacceptable risk" to humans or ecological health. Is there an "acceptable risk" from the contaminated sediments? If so, what are the maximum contaminant levels and risk?
RESPONSE	Dredged material disposed at the designated sites are found suitable for disposal if it meets regulatory requirements and passes testing protocols. Material must not unreasonably endanger or degrade human health or the environment. Dredged material must not cause unacceptable adverse impacts to human health or the environment. Risk assessments are conducted to determine potential carcinogenic and non-carcinogenic risks. Risk assessment uses available scientific information on the properties of an agent and its effects in biological systems to provide an evaluation of the potential for harm as a consequence of environmental exposure. Risks for dredged material are projected based on fish and shellfish consumption.
COMMENT	2. What are the placement management requirements?
RESPONSE	Disposal sites are monitored under a site management plan (SMMP) so that disposal operations can be modified or terminated if unacceptable environmental effects are occurring.
COMMENT	<p>Page 2-14 states: Materials from these smaller dredging projects that exhibit potential for adverse impacts may sometimes still be placed in open water under CWA with proper placement management.</p> <p>This statement is very concerning that such a practice would be determined to be acceptable in context of the Clean Water Act. Further the action grossly contradicts the Federal and State programs to regulate contaminants and pollutants entering water bodies, including the NEPA process.</p> <p>The action identified above is segmentation of the NEPA process using cubic yards (<25,000 CY) as a quantifying threshold without addressing cumulative adverse impacts of multiple events. According to the CEQ regulations, agencies are required, for environmental review purposes, to consider "connected actions", which are defined as proposed actions that: "(i) [a]utomatically trigger other actions which may require environmental impact statements; (ii) [c]annot or will not proceed unless other actions are taken previously or simultaneously; (iii) [a]re interdependent parts of a larger action and depend on the larger action for their justification."</p> <p>The connected action in this instance is the assessment of all dredge spoil to be disposed and that has been disposed in Long Island Sound and the level of contaminants associated with each. The larger action in this instance is the maintenance of navigable waters in Federal waters and waters of the State.</p> <p>Further, the admission above indicates that the PDEIS fails to take a "hard look" at the cumulative actions that could exceed acceptable contaminant thresholds and result in a significant adverse impact to Long Island Sound.</p>

RESPONSE	Disposal sites will be monitored under a site management plan so that disposal operations can be modified or terminated if unacceptable environmental effects are occurring. In addition, as EPA has also explained, mitigation steps that may occur with future disposal projects include "management methods" -- such as "sequential dredging" that modifies the dredging and disposal portions of the project. This is completed in order to minimize environmental exposure and will be utilized when appropriate for specific disposal projects. Other mitigation steps may also be used with specific disposal projects.
COMMENT	The document points out that the impacts from past dredge disposal operations are unknown and it is these admissions that weaken the entire analysis and process. Any conclusions reached are flawed in failure to take a "hard look" of potential cumulative contamination of all past dredge disposal events and the other associated impacts from them.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	The PDEIS and DDMP grossly fails to assess the potential adverse impacts on large marine mammals (porpoise and whales) in Long Island Sound and their habitat. Multiple sighting of porpoise and whales have been confirmed in Long Island Sound including pods with calves. Humpback whales have been observed. Multiple articles are available describing the sightings.
RESPONSE	Numerous comments were received expressing concern that designation of an open-water disposal site in Long Island Sound would result in adverse impacts to the environment, including impacts to fish, birds, and other marine wildlife. As required by Marine Protection Research and Sanctuaries Act (MPRSA) criteria, the potential for such effects was carefully evaluated as part of the EIS process. As discussed in Chapter 5, the available scientific literature, based on years of monitoring at disposal sites similar to those proposed, indicates that the potential for long-term impacts to wildlife in Long Island Sound as the result of dredged material disposal is minimal. Section 5.2 of the PEIS summarizes the potential effects that have been associated with disposal; the majority of these effects have been shown to be temporary in nature and to not affect the long-term health of the ecosystem.
COMMENT	It does not appear that a thorough discussion on the purpose and policy of the is included in the documents.
RESPONSE	Please see response above.
COMMENT	1. Has the potential adverse impacts to marine mammals (porpoise and whale species) and habitat been discussed/assessed?
RESPONSE	As required by Marine Protection Research and Sanctuaries Act (MPRSA) criteria, the potential for such effects was carefully evaluated as part of the PEIS process. Years of monitoring at the existing LIS disposal sites, indicates that the potential for long-term impacts to wildlife in the Sound as the result of dredged material disposal is minimal. As each individual dredging effort is planned, a consultation (pursuant to Section 7 of the Endangered Species Act) with the National Marine Fisheries Service will be required to assess impacts to marine threatened and endangered species as well as those species protected by the Marine Mammal Act.
COMMENT	2. What are the acceptable impacts to Federally Protected Species?
RESPONSE	Acceptable impacts are those that do not jeopardize the existence of a protected species.

COMMENT	3. Can the statement "However, dredging-related impacts are not expected to be significant compared to impacts associated with climate change." stated above be clarified in relation to impacts to Federally Managed Species?
RESPONSE	As noted in the paragraph containing this statement, climate change has the potential for long-term alteration of habitat type which could in turn alter a managed species food source. Dredge related impacts related to habitat disturbance have been documented to be short-term and will not jeopardize the existence of a managed species.
COMMENT	The potential impacts to marine species from dredging operations are assessed at the Town level to the Town of Southold Local Waterfront Revitalization Program (LWRP). The disposal of contaminated dredge spoil in Long Island Sound at the eastern sites does not support the goals and policies of the LWRP.
RESPONSE	<p>Hazardous or toxic dredged material is not placed in the waters of Long Island Sound (please see General Response to Sediment Contamination and Dredged Material Sampling and Testing - 0005R).</p> <p>LWRPs are included in NY State's CZM program. Individual projects with impacts to an LWRP would be evaluated at the time they are proposed consistent with the enforceable policies of the State's CZM program and to the extent there may be impacts. As the DMMP makes no project specific recommendations, there will be no CZM Act consistency determination prepared for the DMMP/PEIS. CZM review, including LWRP considerations, would occur as applicable in the future when specific projects are proposed and evaluated.</p>
COMMENT	<p>The list of potential alternative sites for smaller, non-Federal projects included 75 beaches, 30 concrete and asphalt plants, and 16 potential dewatering sites. These alternatives are not being evaluated in this PEIS.</p> <p>1. Could it be clarified why these alternatives are not being evaluated? NEPA requires a hard look of all alternatives.</p>
RESPONSE	The DMMP is evaluating potential alternatives for Federal projects that might be useable by non-federal interests. The inventory conducted that provided an assessment of each potential small placement site provides information that non-Federal smaller projects can use to evaluate those sites for their placement needs.
COMMENT	As discussed at past public hearings clean sand and other suitable material is valuable to mitigate storm impacts and damage. It is recommended that the stockpiling alternative section be broadened for a beneficial re-use.
RESPONSE	In most cases the DMMP recommends that projects with sandy material use it beneficially for coastal resiliency projects provided non-federal sponsors can be identified. However, stock piling of material from Federal projects for use by other parties in the future would require those parties to first purchase that material from the Federal project.
COMMENT	The document fails to assess the cumulative impact of the 1%-5% sediment loss that would be dispersed in the water column. What would be the total dispersal (in cubic yards lost) times the total number of loads over the project term be?

RESPONSE	Recommended placement plans will be identified as projects move towards implementation. If open water placement is the recommended plan for a particular project, that project would need to investigate and evaluate the impacts of turbidity during placement as part of its NEPA analysis. Turbidity would depend on a number of factors including the size of the project, size of equipment, physical characteristics of the material, and oceanographic conditions at the placement site.
COMMENT	The document fails to acknowledge the fate of dispersed contaminants to unknown areas/receptors. The open-water placement sites are characterized as either being non-dispersive or dispersive. The discussion does not present a clear resolution to sites that are dispersive and suggests that any level of dispersal of sediment (uncontaminated and contaminated) in the water column is acceptable (Page 3-7).
RESPONSE	<p>For bottom sediment to be scoured at a given location on the seafloor, the movement of the water immediately above the sediment has to exert sufficient force on the individual sediment particles (termed the bottom stress) to either push/roll the particles along the bottom or lift and entrain the particles into the overlying waters. Three possible factors can result in the bottom stress being large enough to characterize a location as dispersive in a setting such as Long Island Sound: 1) Near-bottom tidal currents are sufficiently strong enough during at least some portion of the tidal cycle or some types of tides (e.g. spring tides) to scour surficial sediment; 2) Wave-induced, near-bottom orbital currents are of sufficient magnitude (as during the passage of large storms) to mobilize surficial sediment; and 3) Site depths are shallow enough such that the passage of vessels is sufficient to mobilize surficial sediment through direct prop wash scour or through hull displacement. Characterization of a site as dispersive or potentially dispersive is accomplished by the following means: 1) Direct measurement of bottom currents (e.g. deployed current meters) under a range of conditions; 2) prediction of potential bottom currents using a hydrodynamic model; and 3) sequential mapping of the seafloor to provide an empirical record of sediment loss following higher current events (e.g. passage of a large storm). All three of these types of measurements have been used to characterize the hydrodynamic environment of Long Island Sound.</p> <p>An overview of the Sound-wide hydrodynamic modeling can be found at: http://seagrant.uconn.edu/publications/magazines/wracklines/springsummer07/shapelis.pdf</p> <p>Mapping of the seafloor is provided in DAMOS Contribution #160 for the Cornfield Shoals Site and Contribution #182 for the New London Site (available at http://www.nae.usace.army.mil/Missions/DisposalAreaMonitoringSystem(DAMOS)/Reports.aspx).</p> <p>For the Cornfield Shoals Site, located within the main axis of tidal current in Long Island Sound, the strong bottom currents result in sufficient bottom stress to periodically scour the bottom. As a result, dredged material placed at this site does not form a discernible mound, and is transported away from the site and deposited in lower current areas as part of the overall Sound sediment budget. For the New London Site, located outside of the main axis of tidal current, bottom stress is reduced, and dredged material placed at the site has been shown to form discernible seafloor features, stable over a period of decades that has included the passage of large storms. Note that the bathymetry of both of these sites was mapped again as part of DAMOS surveys in October 2015, and the resulting reports should be posted to the DAMOS website in the spring of 2016.</p>

COMMENT	<p>The general term "may", used in the document when discussing dispersal during placement or transport from the site over time by currents and/or wave action is unsettling and indicates that the existing conditions (currents and wave action) relative to sediment dispersal at the targeted sites are largely unknown and therefore the impacts are also unknown.</p> <p>This is unacceptable when discussing potential impacts to Southold Town waters that have experienced a significant rebound in ecological functions and values and species diversity as a result of Federal and Multi-State funding and restoration efforts. Results of dispersal studies (e.g. Rhode Island Sound Disposal Site (RISDS) cannot be extrapolated to sites with different physical (tides, currents and bathymetry) characteristics. Further the differences in operations must also be contemplated.</p>
RESPONSE	Please see response above.
COMMENT	<p>Page 3-8 Section 3.2.2 states that "WLDS, CLDS, and NLDS are non-dispersive sites, where dredged material placed at the site remains at the site."</p> <p>How is this claim validated?</p>
RESPONSE	Please see response above.
COMMENT	The Town of Southold supports the beneficial re-use of clean dredge spoil on Fishers Island. It is recommended that alternatives for beneficial re-use include a discussion on coastal resiliency and the accelerated erosion of the Block Island Sound exposed shoreline.
RESPONSE	The USACE also supports the beneficial use of sandy dredged material in coastal resiliency projects. If the Town has specific sites on Fishers Island that it wishes to be considered it should inform the RDT of those locations and requirements.
COMMENT	It is disingenuous to continually state that the purpose of the DMMP is "eliminating the need for open water placement of dredged material in LIS" when the path to qualify the action is linked to a flawed cost assessment (fails to incorporate remediation) and the overriding theme in the document attempts to convince the public that the long-term impacts of open water disposal has been thoroughly assessed and identified as the most cost-effective method available (Page 7-7) .
RESPONSE	Please see the USACE response above to the first comment made in this letter, and also please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R) .
COMMENT	The Town of Southold strongly supports the Army Corps of Engineers' goal of eliminating the need for open water placement of dredged material in LIS.
RESPONSE	Please see General Response to Availability of Open Water Alternatives (0041R).
COMMENT	The Southold Town Board is also opposed to the continued disposal of dredge spoil in open water of LIS based on insufficient or incomplete information as identified in the DDMP and PEIS on the potential adverse impacts of the action.
RESPONSE	The USACE thanks the Town of Southold for its review and comments on the draft DMMP/PEIS.
<p align="center">Town of Smithtown, NY – Letter to NAE – October 2, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1005)</p>	
COMMENT	The Town of Smithtown is opposed to the continuation of open water disposal of dredged material in Long Island Sound.

RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	1. As currently written, the draft plan would continue the long term practice of disposing of most dredged material generated throughout the region by open water dumping in Long Island Sound. Accordingly, this plan is not consistent with the rules and standards promulgated by the United States Environmental Protection Agency (USEPA) for the future use of dredged material disposal sites in Long Island Sound.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	<p>This standard upon which the DMMP was prepared clearly fails to meet the standard established by the USEPA Final Rule, which holds that open-water disposal may only be allowed if it is the only practicable option, or the environmentally best of a number of practicable options. Accordingly, it would appear that the current draft DMMP must be extensively revised in order to be in compliance with both the standards and intended results of the EPA Final Rule regarding dredged material disposal alternatives.</p> <p>2. Similarly, the standards employed and analysis presented in the Draft Programmatic Environmental Impact Statement are inadequate to support the selection of continued use of dredged material disposal sites in Long Island Sound as an acceptable option in accordance with EPA rules and standards. As the draft Programmatic Environmental Impact Statement was prepared upon the currently deficient DMMP, the PEIS similarly fails to adequately address the potential environmental impacts of dredged material disposal in accordance with the standards contained in the USEPA Final Rule. Further, the PEIS does not attempt to identify the environmentally best alternative for each potential project, nor, at a minimum, does it identify whether any practicable alternatives would be preferable to open-water disposal. In addition, the scope of the analysis of disposal alternatives in the PEIS excludes viable disposal options which were identified in the DMMP itself.</p>
RESPONSE	Regulations governing the preparation of a USACE DMMP require identification of the Federal Base Plan that is the least costly environmentally acceptable alternative. Cost is one measure of practicability will define the extent to which the Federal government will participate in a particular placement option, including beneficial use of the material. This does not preclude implementation of alternatives to open water placement, but defines the non-Federal partnerships and cost-sharing that would be required to implement those alternatives. The DMMP identifies those likely base plans and alternatives. Practicability, including the willingness and capability of other parties to participate, must be determined as individual projects are proposed and funded and specific alternatives can be investigated in detail.
COMMENT	For example, the DMMP noted that dredged material could be beneficially used for reclamation of mined lands in Pennsylvania (see DMMP page 4-61). The PEIS arbitrarily and capriciously limited all disposal options to the New York-Connecticut- Rhode Island study area and therefore failed to even consider this alternative.

RESPONSE	Discussion of mine reclamation as a beneficial use alternative is included in the PEIS in Section 3.8.2. As with the DMMP, this discussion noted that the cost of rail transport over significant distances to PA, and the re-handling required, makes such an option much more costly compared to other alternatives. It must also be noted that without a project specific proposal it is not possible to determine whether any reclamation opportunities would exist for particular materials. Project sediment testing to support such decisions would not occur until a specific dredging project was proposed. Further, whether such an alternative would be available in the future could only be determined at that time. There has been only one large-scale mine reclamation project in the northeast that used marine dredged materials; the Back Camp surface mine reclamation in Clearfield County PA constructed in 1998-2001 with about 425,000 CY from the Port of NY/NJ used to restore about 15 acres. Though others have been proposed and some completed, none that we are aware of has used marine dredged material.
COMMENT	In addition, the PEIS failed to consider rail transport of dredged materials to upland disposal and/or re-use sites, focusing exclusively on the more costly (economically and environmentally) option of truck transport.
RESPONSE	Rail transport was used in developing costs of beneficial use involving a typical mine reclamation project in central PA for the DMMP's cost matrix tool. Use of rail transport would only be possible for a portion of the transport route between dredge and placement sites, with re-handling and trucking required to move material from a waterfront processing facility to the rail access, then at the other end of the trip from the rail siding to the destination at the reclamation site. Multiple re-handling operations result in significant cost increases. None of the upland placement sites identified in the study had direct rail access, and all but the largest harbors in the region do not have waterfront rail access.
COMMENT	3. Finally, Section 5.22 of the DMMP (pages 5-292 through 5-297), regarding the "Smithtown Bay and Stony Brook Harbor Dredging Center", contains incomplete and inaccurate information as well as at least one ill-considered recommendation. For example: A. Page 5-292 lists Asharoken Basin as one of the "principal waterways in this area." However, there is no further mention of this water body or any discussion of past or future dredging operations there.
RESPONSE	The following text has been added to Section 5.22.3: There is no record of dredging for the Asharoken Basin. However this appears to be an improved harbor with two stone jetties, a public boat ramp and pier, and was likely originally constructed to facilitate the building of the adjacent power plant. Without any dredging record or surveys it is not possible to develop projections for needed future dredging.
COMMENT	B. Table 5-205 on page 5-293 is incomplete. Both Stony Brook Harbor and the Nissequogue River were most recently dredged in 2013, yet this information is completely missing from the table. All dredged material was again sand and gravel that was fully used for beach nourishment in the Town of Smithtown.
RESPONSE	No information was provided by New York for activities after 2012. The 2013 dredging event has been added to the Table 5-205, however no dredge quantity has been provided.
COMMENT	C. Section 5.22.3 overestimates the quantity of fine-grained material expected to be generated by future dredging operations, apparently due to a combination of unsupported and/or faulty assumptions and basic mathematical errors. Specifically:

	<p>i) Section 5.22.3 states that county dredging records show that between 1953 and 2009, 33 percent of the dredged materials were fine-grained and 67 percent were sand. Reference to "Table 5-205 - Suffolk County Dredging Project History" reveals that 79 percent of the dredged materials were "sand" or "sand & gravel", with only 21 % consisting of "sand and mud". Even assuming that the two "sand and mud" examples were almost entirely mud, this would mean that at most 20 percent of historically dredged materials were fine-grained.</p>
RESPONSE	<p>The comment is correct. Text and tables have been revised to show that split between sandy and fine-grained sediment from the Suffolk County records should be 79% and 21%.</p>
COMMENT	<p>ii) As shown in Table 5-205 and as correctly stated in Section 5.22.4 on page 5-295, all material dredged from both Stony Brook Harbor and the Nissequogue River since 1980 has been classified as "sand" or "sand and gravel." Section 5.22.4 also states that all future dredged materials from these waterways are expected to be clean sand. As these are the only waterways in this Dredging Center which have been identified in the DMMP for future dredging, these statements call into question the assumption in Section 5.22.3 that 85 percent of future dredged materials will be clean sand and 15 percent will be fine-grained material.</p>
RESPONSE	<p>Please see the response to the below comment. Based on the 1960s and 1970s dredging which was classified as sand and mud, some portion of future dredge materials, particularly from improvement projects and marinas, will likely be fine-grained. Without any historic or current testing data to go by, assumptions must be made as to the split between material types. Taking the Town's assertion with respect to the Suffolk County maintenance dredging, that all future work would yield sand, then a percentage split would only need to be made for the non-County projected work. Table 5-206 and the text have been revised to reflect this approach.</p>
COMMENT	<p>iii) As will be noted below, Table 5-206 anticipates large volumes of dredged materials from unidentified "Other NF Maintenance" and "Improvements" projects. The sediment compositions expected from each of these currently unidentified projects must be clearly identified in Section 5.22.3 of the DMMP.</p> <p>D. In Table 5-206, the heading "Suffolk County Maintenance" fully accounts for the maintenance dredging activity expected to be conducted in both Stony Brook Harbor and the Nissequogue River during the next thirty years. However, Table 5-206 also shows estimated dredging for the 2015-2020 time period of 151,500 cubic yards for "Other NF Maintenance" and 200,000 cubic yards for "Improvements", with additional quantities in subsequent time periods. None of these projects have been identified or discussed in the draft DMMP, a fact which raises significant concerns regarding the transparency of the current documents. The location, purpose, and sediment composition of each of these projects must be identified and discussed in the necessary revised DMMP.</p>

RESPONSE	Projections of non-Federal dredging projects and volumes came from responses to the facility surveys that are summarized and discussed in the dredging needs assessment (Technical Supporting Document #2). It is not the USACE's responsibility to test materials from these projects. That will be done by project proponents at the time those projects are proposed and reviewed in the future. Suffolk County is the largest contributor to this total with a projection of 675,700 CY of maintenance over the next 30 years in this dredging center. The remaining material, about 386,800 CY of maintenance and improvement dredging, comes from the 5 facilities in the dredging center which responded to the 2008-2009 needs survey, mainly marinas and boat yards. One of the requirements of the Federal survey of facilities was a confidentiality clause that individual facility names would not be identified. This is a standard OMB requirement for Federal agency surveys of private parties and the public.
COMMENT	E. Table 5-207 is incomplete and inaccurate. At a minimum, the Table should also include Long Beach, Schubert Beach, and Short Beach in the Town of Smithtown, and West Meadow Beach in the Town of Brookhaven. All of these beaches have received beach nourishment material generated from within this dredging center.
RESPONSE	The last paragraph from Section 5.22.5 states "Over the past few decades dredged materials from this dredging center have been placed as nourishment on area beaches, and upland as fill for waterfront and public park development. The several investigations of placement alternatives identified the following as opportunities for placement for projects from this dredging center. While only three beaches were identified by the survey for nearshore placement, there are other beaches in the dredging center which have been used, or may upon detailed investigation, prove to be candidates for placement. The DMMP recognizes that additional beaches have been and could be used. The DMMP investigation of beach nourishment candidates was limited to larger public beaches or beaches that had been used in the past for Federal navigation project materials. The additional beaches cited by the Town have been noted in the revised DMMP text in Section 5.22.5.
COMMENT	Bayville Beach should be removed from Table 5-207 as it is located a substantial distance from this dredging center. Similarly, Asharoken Beach is located a substantial distance from both the Nissequogue River and Stony Brook Harbor, and should be removed from Table 5-207 unless it is intended to receive dredged material from a closer location. If so, the closer location(s) must be clearly identified and discussed as noted above.
RESPONSE	Asharoken Beach is located within this dredging center, and Bayville Beach is in the next dredging center to the west. While too distant for direct placement via pipeline dredge, these beaches could receive material from the Smith/Stony Brook dredging center at nearshore sites from scows or hopper dredges. Both of these beaches have experienced recent erosion, which makes them candidates for nourishment.
COMMENT	F. Section 5.22.5 and Table 5-207 propose the potential use of dredged materials to construct a nearshore feeder bar/berm off Sunken Meadow State Park. This recommendation is ill-considered at best and should be eliminated from consideration and removed from the DMMP. The longshore current in this area flows west to east, and the construction of a nearshore feeder bar/berm in this area will exacerbate the already severe shoaling problem in the Nissequogue River boat channel, resulting in the need for additional dredging operations.

RESPONSE	The feeder bar/berm location identified for Sunken Meadow State Park in Kings Park, NY (Site #170) is described in detail in the 2012 Technical Supporting Document #8; Nearshore Berm Site Report. That report noted that the east end of the proposed berm site was within a mile of the Nissequogue entrance channel, and that while the creation of a berm at location should reduce wave energy in the location of the channel, storm events could result in berm sands migrating toward the channel. If a nearshore feeder berm is ever proposed for Sunken Meadow State Park, it may be necessary to move the location further west, beyond the Golf Course, so that material is more likely to reach the beach and not increase channel shoaling. Specific studies would need to be conducted if this site were ever considered to determine if an appropriate location can be identified for this beach. This information has been added to the text in DMMP Section 5.22.5.
COMMENT	G. Table 5-208 shows "Scow Haul Distances to Nearshore and Open Water Placement Sites" from the Nissequogue River and Stony Brook Harbor project sites. The table should reflect the fact that the dredged material disposal sites for these projects have received beach nourishment material via hydraulic dredge pipelines. In addition, if other dredging project locations are anticipated in the "Smithtown Bay and Stony Brook Harbor Dredging Center", then the distances from those project locations to the placement sites should be included in Table 5-208.
RESPONSE	That information was included in DMMP Section 5.22.3. The following language has also been added to the DMMP Section 5.22.5: County and municipal dredging projects in recent decades have used hydraulic pipeline dredges for direct placement of these materials on adjacent beaches and are expected to continue to do so in the future.
Greenwich Harbor Management Commission (Bernard Armstrong), CT Letter to NAE – Oct 1, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1037)	
COMMENT	As a business whose lifeblood is navigational access, dredging is critical to ensure public access and commerce. This scientific plan clearly shows that open-water disposal to be the most cost -effective and environmentally compatible method of placement without adversely affecting Long Island Sound for the majority of dredge material. We believe access to these placement sites must be preserved to provide economically viable dredge solutions.
RESPONSE	The dredging needs analysis conducted for the DMMP showed a maximum of 53 million CY of needed dredging in the Long Island Sound region over the next 30 years. While it is unlikely that all of the projects would be funded, meeting the bulk of this need is critical to maintaining the navigation-dependent sectors of the regional economy as referenced by many commenters. Increased dredging and placement costs would impact the economic viability of these industries.
COMMENT	As an active boater and racer on Long Island Sound and an active member of Riverside Yacht Club on the Mianus River I am not happy to report that we cannot get deep draft sailboats into our docks and hour or more on each side of a low tide. This is creating an extreme hardship not only for our club boaters but all of the boats harbored upstream from RYC in Cos Cob CT. History shows us that at one time Cos Cob harbor was able to carry large wooden sailing vessels. Now even power boats have trouble using the river and dredging the Mianus River has to be a key State and Federal priority which means the open water disposal in Western Long Island Sound is imperative to the boating life on this key river.

RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
COMMENT	Connecticut, out of the three subject states, clearly has the greatest dredge need and I fully support the U.S. Army Corps of Engineer's recommendation for continued open-water placement in the four current locations as part of the overall plan. Thank you for your hard work and diligence in this effort.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Town of Old Lyme, CT, First Selectwoman – Letter to NAE – September 30, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1078)	
COMMENT	I join our Governor, our full Congressional delegation, the CT Dept. of Energy and Environmental Protection, surrounding local Chambers of Commerce and nearby communities in support of the Army Corps of Engineers' Dredge Material Management Plan.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	As has been articulated, Connecticut, out of the three subject states, clearly has the greatest dredging needs. As a community bordered by the Long Island Sound and the Connecticut River, we respect the unique environment, strive to protect it, and prioritize access for all. There are so many local small businesses that rely on accessibility to the waterways, and are the fabric of our community, and are an integral part of the character that we all enjoy.
RESPONSE	The DMMP recognizes the importance of cost-effective navigational dredging to Connecticut's economy, as well as its fishing, boating and tourist industry.
COMMENT	The Army Corps of Engineers has completed a comprehensive study that addresses concerns, balances the needs of all, and allows dredging to continue in a cost-effective and environmentally respectful manner, through continued open-water placement of approved material in the four current locations.
RESPONSE	Please see General Response to Availability of Open Water Alternatives (0041R).
Town of Groton, CT, Mayor and Town Manager – Letter to NAE – September 30, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1076)	
COMMENT	We are writing today on behalf of the Town of Groton, Connecticut, in support of the above noted draft plan that was released on August 17, 2015.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	Approval of the Dredge Material Management Plan (DMMP) and the Programmatic Environmental Impact State (PEIS) for Long Island Sound would have a positive impact on the state, the region, and the Town including many of its businesses and residents. As presented, the plan ensures that both economic development and recreational uses would be able to maintain the required channels at a reasonable cost thus ensuring their longterm viability. It is our strong opinion that the proposed plan takes a rational and reasoned approach to the handling of the materials that will be generated by future needed dredging operations .. Groton has long been considered the "economic breadbasket" of southeastern Connecticut. and1 would help ensure that existing water-dependent uses, be they industrial, commercial, or' recreational in nature, will continue to exist and thrive.

RESPONSE	Please see General Response to Dredging Economy (0006R).
Old Lyme Harbor Management Commission (Farman) – Email to NAE – Sept 29, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1105)	
COMMENT	I serve as Vice-Chair of the Old Lyme, CT Harbor Management Commission and as a member of the Connecticut Harbor Management Assn. Since 2009 I have led our municipal effort to dredge two non-federal waterways, the Four Mile and Black Hall Rivers, in the interest of environmental protection and safe boating access to Long Island Sound. Having been permitted by CT DEEP and ACE and funded by CT DOT, we plan to deposit 23,000 cubic yards of dredged material at the Central LIS site at a cost of \$70 per yard. I strongly support the recommendation of the UConn Avery Pt. scientific team to re-open the New London disposal site, and maintain the Central and Western LIS sites beyond 2016. The \$8 billion recreational boating industry's survival in CT depends on addressing siltation and having disposal sites that are not cost prohibitive. It has been amply demonstrated that, properly conducted, LIS disposal sites pose no harm to the environment.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Town of Essex, CT, First Selectman – Letter to NAE – September 28, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1162)	
COMMENT	I am writing in full support of the U.S. Army Corps of Engineers Draft Dredged Material Management Plan (DMMP) and Draft Programmatic Environmental Impact Statement (PEIS) for Long Island Sound. These plans clearly show that open-water disposal to be the most cost effective and environmentally compatible method of placement without adversely affecting Long Island Sound for the majority of dredge material. We believe access to these placement sites must be preserved to provide economically viable dredge solutions especially for our smaller businesses that rely on navigational access for their livelihood. I fully support the U.S. Army Corps of Engineer's recommendation for continued open-water placement in the four current locations as part of the overall plan.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Town of Sprague, CT, First Selectman – Letter to NAE – September 28, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1164)	
COMMENT	I am writing today on to support the Draft Plan that was released on August 17, 2015. As a First Selectman from Sprague, Connecticut, a Town within the state which has 332 miles of coastline, coves, and harbors on Long Island Sound, I applaud the Army Corps for identifying new environmentally sound alternatives for the handling of dredging materials, such as beach nourishment and wetlands restoration. Knowing that only a small portion of dredge materials can be used on land beneficially, I also understand the continued need for open-water disposal options currently in use in Connecticut waters and support continuing this disposal method for fine-grained materials suitable for open-water placement.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	In addition to the critical goal of protecting the Long Island Sound, access to a range of dredged material placement options is absolutely vital to our regional and state economies.
RESPONSE	Please see General Response to Open-Water Placement (0004R).

COMMENT	According to the DMMP, economic activities that utilize Long Island Sound waterways contribute more than \$9 billion annually in economic output. Additionally, these economic activities support more than 55,000 jobs in the Long Island Sound region. As important, our region is dependent on a range of federal and military facilities, such as the SUBASE New London, dependent on the viability of accessible and cost-effective placement options. If this dredging plan does not move forward, it is estimated that without action the region will see a fifteen percent dip in navigation-dependent economic activity revenue in the next two decades, and significant - and perhaps prohibitive - increases in costs for the private, commercial and federal stakeholders.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	Thus I applaud the Army Corps for identifying new environmentally sound alternatives for the handling of dredging materials, such as beach nourishment and wetlands restoration. In Connecticut, dredged materials have not only been used for shoreline replenishment, but also for capping landfills and brownfields sites upland.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	Knowing that only a small portion of dredged materials can be used on land beneficially, we also understand the continued need for open-water disposal options currently in use in Connecticut waters and support continuing this disposal method for fine-grained materials suitable for open-water placement.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Harbor Management Comm'n, Town of Essex, CT – Letter to NAE – Sept 25, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1224)	
COMMENT	The Essex Harbor Management Commission supports the Dredged Material Management Plan recently released by your agency.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	The economic health of our town is deeply tied to the harbor and the ability to maintain our navigable waters is critical.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	We need the ability to dredge and dispose of the material in a safe and economically viable option. Our harbor is located on the southern section of the Connecticut River and maintaining everyone's access to these waters requires occasional dredging. We must keep the access to open-water disposal.
RESPONSE	Please see General Response to Availability of Open Water Alternatives (0041R).
City of Norwich, CT, Mayor Deberey Hinchey – Letter to NAE – September 24, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1265)	
COMMENT	I am writing on behalf of the City of Norwich in support of the U.S. Army Corps of Engineers Draft Dredged Material Management Plan and Draft Programmatic Environmental Impact Statement for Long Island Sound.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	Long Island Sound's navigation-dependent activities contribute \$1.6 billion annually in Federal and State tax revenues. It is important to keep Long Island Sound's nearly 400 ports operable for the hundreds of commercial and recreation ships that use these ports daily.
RESPONSE	Please see General Response to Dredging Economy (0006R).

COMMENT	Connecticut has been responsibly dredging using open-water placement for 35 years and the Dredged Material Management Plan and the Programmatic Environmental Impact Statement will provide the Long Island Sound region with a balanced approach for future waterway maintenance projects.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	The rise in sea level and increased storm intensity, due to climate change, will create opportunities for beneficial uses of dredged materials in resiliency projects.
RESPONSE	Some of the alternatives identified in the DMMP include measures to mitigate impacts of sea level rise on eroding shorelines and inundated marshland. Placement of dredged material has no impact on water temperature.
City of New London, Fire Dept (H. Kidd, Jr., Chief) – Letter to NAE – Sept 24, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1289)	
COMMENT	As the Fire Chief for the City of New London and a member of the New London Marine Group I am writing to express my support for the Dredged Material Management Plan (DMMP) recently released by your agency. The evidence that has been presented has identified the most fiscally and environmentally suitable means for managing dredged materials for the future.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	The economic vitality of our port sustains numerous small businesses including charter fishing operations, commercial fishing operations, recreational marinas and overall access to the waters of Long Island Sound.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	The environmental component has been well researched and documented. The continued monitoring of open-water disposal sites along with the detailed permitting process that precedes disposal operations has been designed such to ensure that water quality and that of the overall marine environment remains unharmed.
RESPONSE	Please see General Response for Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	Finally the safety component. If continued maintenance dredged operations are interrupted and the navigable waters of our State and region impacted the threat of groundings increases substantially; the results of which could endanger human lives and safety and the health and safety of our environment.
RESPONSE	Please see General Response to Navigational Safety (0077R)
COMMENT	Connecticut clearly has the greatest dredge needs and the port of New London would certainly benefit. These must needs must be met with sound economic and environmental solutions that I believe have been achieved in this Plan.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Town of Guilford, CT, Harbor Management Comm'n – Email to NAE – Sept 23, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1290)	
COMMENT	The Guilford Harbor Management Commission fully supports the Corps recommendation to continue open water placement of approved material from dredging in Connecticut. Until there are other cost effective means available, open water placement in LIS is the only sensible method.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.

Town of East Lyme, CT, First Selectman– Letter to NAE – September 23, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1291)	
COMMENT	As First Selectman of the Town of East Lyme, I am writing to express my support for the Dredged Material Management Plan (DMMP) recently released by your agency. The evidence that has been presented has identified as the most fiscally and environmentally suitable means for managing dredged materials for the future.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	The existing open-water placement locations, Western, Central, Cornfield Shoals and New London have all proven to provide the most economically viable placement locations for the projects from their geographic regions without adversely affecting Long Island Sound.
RESPONSE	Please see General Response to Availability of Open-Water Alternatives (0041R)
COMMENT	The environmental component has been well researched and documented. The continued monitoring of open-water disposal sites along with the detailed permitting process that precedes disposal operations has been designed to ensure that water quality and that of the overall marine environment remains unharmed.
RESPONSE	See General Response for Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	Marinas in the area are typically owned by family businesses and silt buildup is a problem for both safety and accessibility. Additional costs associated with other disposal alternatives can mean the closure of those businesses if they lack competitiveness when adding those expenses to their fees. If continued maintenance of dredged operations is interrupted and the navigable waters of our State and region are impacted, the threat of groundings increases substantially; the results of which could endanger human lives and safety and the health and safety of our environment.
RESPONSE	Please see General Response to Navigational Safety (0077R)
COMMENT	Connecticut clearly has the greatest dredge needs. These needs must be met with sound economic and environmental solutions that I believe have been achieved in this Plan
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Michael E. Passero, New London City Council, CT – Letter to NAE – Sept 23, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1307)	
COMMENT	I am writing to express my support for the Dredged Material Management Plan (DMMP) recently released by your agency. The DMMP is clearly the most fiscally and environmentally suitable means for managing dredged materials for the future.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	Preserving the economic vitality of Port New London is crucial to sustaining the numerous small businesses that depend on the port, including charter fishing operations, commercial fishing operations, recreational marinas and overall access to the .waters of Long Island Sound.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	The environmental component has been well researched and documented. The continued monitoring of open-water disposal sites along with the detailed permitting process that precedes disposal operations has been designed such to ensure that water quality and that of the overall marine environment remains unharmed.

RESPONSE	See General Response for Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	Moving forward with the DMMP is also crucial to maintaining the safe operations of our port. If continued maintenance dredged operations are interrupted and the navigable waters of the State and specifically Port New London are impacted the threat of groundings increases substantially, the results of which would pose a risk to human life and threaten the environment.
RESPONSE	Please see General Response to Navigational Safety (0077R)
COMMENT	Connecticut clearly has the greatest dredge needs. These must needs must be met with sound economic and environmental solutions that I believe have been achieved in this Plan.
RESPONSE	Please see General Response to Dredging Economy (0006R).
Town of Waterford, CT – Letter to NAE – September 23, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1310)	
COMMENT	I am writing today on behalf of the Town of Waterford, Connecticut in support of the Draft Plan that was released on August 17, 2015. The Town of Waterford has strong ties to the maritime industry and values and relies on Long Island Sound and its tributaries for recreation and economic development uses. Passage of the Dredged Material Management Plan would positively impact the town and its residents.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	Many residents of the town use Long Island Sound for their boating and fishing enjoyment, while the Naval Submarine Base and Electric Board Division of the General Dynamics depend on the Sound for economic reasons. A large number of our residents are employed by Electric Boat or one of their many sub-contractors. Loss of or restrictions on either of these two economic generators would have a devastating impact on our Town. The Plan ensures that both entities could maintain the required channels at a reasonable maintenance cost thus ensuring their stability. The controlled disposal of these materials would ensure that our residents who enjoy Long Island Sound would continue to do so in a clean and healthy body of water.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	We request the Army Corps of Engineers approve the Dredged Materials Management Plan, which is so important to the citizens and businesses of Waterford.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Town of Greenwich, CT, DPW (Amy Siebert) – Email to NAE – September 22, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1336)	
COMMENT	I would like to add my support for the USACE's draft Dredged Material Management Plan for Long Island Sound. It is important to continue to have the option for open water placement of dredged material, balancing concerns about Long Island Sound's environmental health with cost effectiveness and other impacts associated with land based disposal.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.

City of New Haven, CT, Harbormaster (John Izzo) – Letter to NAE – Sept 22, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1337)	
COMMENT	I am writing you in support of the Dredge Material Management Plan (DMMP) study. As Harbormaster of New Haven Harbor I feel that it is critical to maintain and keep open these (4) open water placement sites. My life has revolved around this harbor and without maintenance dredging there would be a severe economic, environment and public safety burden.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	Without maintaining the channel depth this would be devastating to these businesses and the economy of Connecticut. New Haven harbor also is one of the top producers of oysters and harvest other shell fish. The commercial fishermen who harvest here also moor their boats within the harbor. Without maintaining their docks to sufficient depths this would be a burden to this industry. There is also the presence of recreational boating facilities within New Haven's harbor and rivers. The number of recreational boaters is over a thousand, maintaining the marinas, boat ramps, and access is vital to all. Providing access to long island sound with the encouragement of water dependent use would be hindered. Although I have sighted New Haven Harbor I know that the majority of coastal towns face similar problems. The bottom line is that the need for dredging and safely disposing of it's material in a safe and economic way is imperative for our way of life.
RESPONSE	Please see General Response to Dredging Economy (0006R).
Town of East Lyme, CT, Harbormaster, – Letter to NAE – September 22, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1350)	
COMMENT	As the Harbor Master for the Town of East Lyme, I am writing to express my support for the Dredged Material Management Plan (DMMP) recently released by your agency. The evidence that has been presented has identified the most fiscally and environmentally suitable means for managing dredged materials for the future.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	The economic vitality of our port sustains numerous small businesses including charter fishing operations, commercial fishing operations, recreational marinas and overall access to the waters of Long Island Sound.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	The environmental component has been well researched and documented. The continued monitoring of open-water disposal sites along with the detailed permitting process that precedes disposal operations has been designed such to ensure that water quality and that of the overall marine environment remains unharmed.
RESPONSE	See General Response for Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	Finally the safety component. If continued maintenance dredged operations are interrupted and the navigable waters of our State and region impacted the threat of groundings increases substantially; the results of which could endanger human lives and safety and the health and safety of our environment.
RESPONSE	Please see General Response to Navigational Safety (0077R)
COMMENT	Connecticut clearly has the greatest dredge needs. These must needs must be met with sound economic and environmental solutions that I believe have been achieved in this Plan.

RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Mayor Marian Galbraith, City of Groton, CT – Letter to NAE – September 22, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1347)	
COMMENT	I write to you today on behalf of the City of Groton in support of the U.S. Army Corps of Engineers Draft Dredged Material Management Plan (DMMP) and Draft Programmatic Environmental Impact Statement (PEIS) for Long Island Sound.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	We value and rely on Long Island Sound and its tributaries for both recreation and economic development uses. The City is home to Electric Boat Division of General Dynamics and a strong connection with our neighbor, Naval Submarine Base New London. The loss of, or restrictions on either of these two economic generators would have a devastating impact on our community. The Plan ensures all entities could maintain the required channels at a reasonable maintenance cost thus ensuring their stability.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	To that end, we applaud the Army Corps for identifying new environmentally sound alternatives for the handling of dredging materials, such as beach nourishment and wetlands restoration. We request the Army Corps of Engineers to approve the DMMP, which is so important to the citizens and businesses in our greater community.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Mayor John A. Rodolico, Town of Ledyard, CT – Letter to NAE – Sept 22, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1351)	
COMMENT	I am writing today on behalf of the Town of Ledyard, Connecticut in support of the Draft Plan that was released on August 17, 2015.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	The Town of Ledyard has strong ties to the maritime industry and values and relies on Long Island Sound and its tributaries for recreation and economic development uses. Passage of the Dredged Material Management Plan could directly impact the town and its residents. Many residents of the town use Long Island Sound for their boating and fishing enjoyment, while the Naval Submarine Base and Electric Boat Division of General Dynamics depend on the Sound for economic reasons. The Town is host to a portion of the Naval Submarine Base and a large number of our residents are employed by Electric Boat or one of their many sub-contractors. Loss of or restrictions on either of these two economic generators would have a devastating impact on our Town. The Plan ensures that both entities could maintain the required channels at a reasonable maintenance cost thus ensuring their stability. The controlled disposal of these materials would ensure that our residents who enjoy Long Island Sound would continue to do so in a clean and healthy body of water.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	We request the Army Corps of Engineers to approve the Draft Dredged Materials Management Plan, which is so important to the citizens and business of Ledyard.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.

City of New Haven, Planning Department – Letter to NAE – September 21, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1400)	
COMMENT	The Port in the Harbor of New Haven is an important resource that generates significant economic and environmental benefits for the City, the region, and the State; therefore we support the Dredged Material Management Plan recently released by the Army Corps of Engineers and its recommendations for environmentally safe and cost effective disposal of dredge spoils.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	New Haven's particular concern is the use of the "borrow" pit in Morris Cove as a disposal site. This site should be used only for New Haven projects, and only after all appropriate testing and other requirements have been met.
RESPONSE	The use of any placement alternative identified in the DMMP, including the use of the former Morris Cove borrow pit as a CAD cell, would first require a specific project be proposed to use that site, further investigation of the site's suitability to receive material from that project, and completion of the necessary NEPA document and required Federal and State regulatory reviews, including an opportunity for public input and comment.
COMMENT	The Port's viability is contingent on the ability to economically and safely dredge both the Federal Navigation Channel and the access to the wharves and docks that border it. The City of New Haven and the State of Connecticut are pursuing port expansion as an economic and environmentally less damaging alternative mode of transport for bulk cargoes.
	The need to dispose of the dredged materials is constant and ongoing. It is imperative that the two open water sites - The Central Long Island Sound and Western Long Island Sound sites (CLDS and WLDS) must remain open and available for appropriately tested material. Thirty years of use and monitoring have shown that these sites are effective and environmentally sound.
RESPONSE	The USACE understands the need for practicable, cost effective dredged material placement options which are also environmentally acceptable, to support continued port operations and proposed navigation improvements, and the importance of the port and the industries it supports to regional economy.
COMMENT	[G]iven the cost of disposal and the limited capacity of the sites identified, the Morris Cove borrow pit site in inner New Haven Harbor should be reserved for New Haven projects only, and used only as a last resort after all required and necessary testing and investigation is performed to the satisfaction of the host community.
RESPONSE	Please see the response to the second comment listed above for this letter regarding the Morris Cove borrow pit site.
Suffolk County Legislators – Joint Letter to NAE – September 9, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1786)	
COMMENT	We the undersigned members of the Suffolk County Legislature are writing to request that the United States Army Corps of Engineers extend the comment period. for the Long Island Sound Draft Dredged Material Management Plan (DMMP) and Programmatic Environmental Impact Statement (PEIS) for a minimum of 120 days from the date the documents were made available to the public, which was on August 17, 2015.

	Also, we request USACE hold additional public hearings on Long Island later this fall. The only hearings scheduled for Long Island were on August 24 & 25. In addition to being an inconvenient time for most institutions and individuals as late August is a popular time for vacations, not enough time was given for stakeholders to review these highly complex and lengthy documents. It is unrealistic to assume the Draft DMMP and FEIS can be read, absorbed and responded to in a thoughtful and thorough manner in only seven days.
RESPONSE	Please see General Response to Public Involvement (0003R).
COMMENT	The Long Island Sound is recognized as an estuary of national significance. This critical resource has been degraded by pollution, inappropriate development and rising water temperatures. Millions of dollars have been dedicated to preserve the viability of the Sound for future generations to come. Every precaution must be taken to ensure that the Long Island Sound will remain a clean, productive body of water for fishing, recreating and commerce.
RESPONSE	Please see General Response to Estuary of National Significance (0015R).
COMMENT	To continue to dump even minimally contaminated dredge spoil into the LIS is counter to this charge.
RESPONSE	Please see General Response to Sediment Contamination (0005R).
COMMENT	<p>The long-term costs of continuing open-water disposal of dredge spoil in Long Island Sound have not been completely assess and the alternatives have not been given adequate consideration.</p> <p>The long-term effects of open-water dumping are not well understood, but we do know that toxins bio-accumulate in marine life. We don't fully understand the synergistic effects of various toxins when combined in the same environment. What might be considered to be an acceptable level of a particular toxin by today's standards could be found to be harmful in the future.</p>
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	Other threats, such as climate change in the form of rising sea levels and water temperature, are bringing additional challenges that must be addressed to secure the long-term health of the Long Island Sound.
RESPONSE	Some of the alternatives identified in the DMMP include measures to mitigate impacts of sea level rise on eroding shorelines and inundated marshland. Placement of dredged material has no impact on water temperature.
COMMENT	The short term savings of open water disposal may indeed cost our descendants dearly in the long run.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).

Suffolk County NY Legislator Sarah Anker – Letter to NAE – August 24, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1860)	
COMMENT	I am writing to express my concerns with the 2015 Long Island Sound Draft Dredged Material Management Plan (DMMP) that will allow contaminated dredge spoils to be dumped into the Long Island Sound. In 2005, I attended public hearings regarding the phase out of dumping contaminated dredge material into the Sound. The final outcome from the 2005 hearing, agreed upon by both New York and Connecticut government officials, was to task the United States Army Corp of Engineers (USACE) to submit a report that would provide an alternative to dumping spoils into the sound by finding beneficial use for dredged material including beach replenishment, habitat restoration and mined land reclamation.
RESPONSE	Please see General Response to DMMP Goal to Eliminate or Reduce Open-Water Placement or Phase Out Open Water Placement (0042R)
COMMENT	After reviewing the recent draft plan submitted by the USACE, I could not disagree more with the report that plans to continue using the Sound as a dredging disposal site.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	1. Did you not understand that we -the residents of Long Island, public officials and professional researchers -do not want, or will not accept the dumping of contaminated dredge spoils into the Long Island Sound, that will decimated our most valuable economic and cherished water source?
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	3. Will you extend the comment period for more than 30 days (as the report says) to allow adequate time to analyze this 1,300 page report? 4. Given the lack of notification I received regarding the recent public hearing, can please notify me on upcoming hearings related to this issue?
RESPONSE	Please see General Response to Public Involvement (0003R).
Riverhead Town Councilwoman Jodi Giglio – Letter to NAE – August 24, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1862)	
COMMENT	I am a Councilwoman for the Town of Riverhead and I write this letter to express my concern and opposition as both a Councilwoman and resident of Riverhead to the US Army Corps of Engineers' and the US Environmental Protection Agency's plan to continue dumping dredge spoils in the Long Island Sound.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	In 1987, Congress designated Long Island Sound an Estuary of National Significance. The Long Island Sound is among the most important and valuable estuaries in the nation. The Long Island Sound is an estuary where saltwater from the ocean mixes with fresh waters from our rivers. This estuary is located within the jurisdictional limits of two states, New York and Connecticut, approximately 110 miles long and 21 miles across at its widest point and covers an area over 1200 square miles and boasts 600 miles of diverse coastline habitat with beaches, salt marshes and tidal flats. The Long Island Sound serves as feeding, breeding, and nursery areas for many species and is the home to more than 1,200 species of invertebrates, more than 170 species of fish, and dozens of species of birds that migrate and nest along its coastline for part of the year.

	The Long Island Sound supports diverse uses all dependent on the quality of its waters, living resources, and habitats. Our recreational and commercial shell fishers harvest oysters, lobsters and crabs. Our fisherman fish for fluke, flounder, bluefish and striped bass. The Long Island Sound is also enjoyed by recreational boaters and serves as transportation route for ferries to and from the East End of Long Island.
RESPONSE	Please see General Response to Estuary of National Significance (0015R).
COMMENT	The act of dredging and dumping of spoil have well-known potential negative impacts on our environment, including degradation of water quality, changes to hydrodynamics, smothering of benthic fauna and flora, damage to marine wildlife through the dredge mechanism, species and removal of habitat.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	The dredge spoils often contain toxic chemicals and the process of dredging often dislodges chemicals residing in substrates and injects them into the water.
RESPONSE	Please see General Response to Sediment Contamination (0005R).
COMMENT	The potential for significant harmful environment impacts has long been recognized by the federal, state and local governments. This recognition is fully set forth in the U.S. Clean Water Act which forbids the discharge of any dredged material or fill into waters of the United States without complete evaluation of environmental impacts and elimination of the potential to degrade the water quality and other negative impacts outlined above.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	The dredging and placement of dredge spoil is fraught with the potential to contaminate this invaluable estuary; damage, smother, and annihilate marine species and habitat; and, finally, destroy our accomplishments and undermine the goals for future restoration of the Long Island Sound Estuary.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	I oppose the US Army Corps of Engineers' and the US Environmental Protection Agency's plan to dumping dredge spoils in the Long Island Sound.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
Town of Brookhaven, Anthony Graves, Public Hearing Statement – August 24, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1864)	
COMMENT	After reviewing the Plan I have come to the conclusion that it fails to achieve the goals of the request made by the governors of New York and Connecticut ten years ago for a plan to
RESPONSE	Please see the General Response to Eliminate or Phase Out Open-Water Placement (0042R).
COMMENT	Other alternatives (upland dumping, beach nourishment, wetland restoration) are reviewed in a preemptory manner with the Plan generally noting that any costs that are over that of open water disposal will need to be borne by the state or municipality.
RESPONSE	Please see General Response to Open-Water Placement (0004R).

COMMENT	The Plan repeatedly states that contaminated Confined Aquatic Disposal Cells and Confined Open Water Sites { Activities which involve excavation of the sea floor could remove a cell cap and expose the material placed in the cell below the cap to the environment) are an environmentally safe alternative. However, with sea level rise, climate change and increases in storm intensity the burial of contaminated materials in the Long Island Sound does not appear supported as an acceptable alternative. The release of toxic materials from dredge spoils can be devastating to the local eco-system, commercial fishing, tourism and recreational activities.
RESPONSE	Please see General Response to Confined Aquatic Disposal Cell Development (0008R)
COMMENT	<p>1. Does the Plan achieve its goal?</p> <p>Upon review we find that the plan does not achieve its goal. The stated goal of the LIS DMMP is intended to help achieve the goal of "reducing or eliminating the disposal of dredged material in Long Island Sound." The LIS FEIS and subsequent June 3, 2005 Rule designated two of the Sound's historic open-water placement sites, the Central Long Island Sound and Western Long Island Sound Sites (CLDS and WLDS) for continued use. The Rule allowed those two sites to be used for eight years pending completion of a DMMP, with provisions for EPA to extend the term of use. The EPA has twice extended use of those two sites, with site closure now projected for April 30, 2016.</p> <p>Although the goal to reduce or eliminate the use of open water disposal is quoted in a number of locations throughout, the document is focused primarily on establishing conditions pursuant to which LIS may continue to be used under the current status quo as an open water waste disposal facility.</p> <p>2. Are there any quantitative reductions in the amount of dredge spoil to be dumped in the Sound listed as goals?</p> <p>Our review to date indicates there are no substantive reductions in the amount of dredge spoil planned to be dumped in the Long Island Sound. The Corps' base plans identified for each of the Federal Navigation Projects (FNPs) and suggested placement options for non-federal projects (in Section 5 of the pre-draft DMMP) continue to be open-water disposal, with few exceptions and identified alternatives, and are based solely on the assumption that all other options are too costly to be practicable for use in FNPs. Of specific concern is the plan to continue to dispose up to 80% of the dredged materials at disposal sites in LIS over the next 30 years, which represents less than a 4% reduction in the amount of dredged materials that are currently disposed of in LIS. (NYSDOS)</p>
RESPONSE	Please see the General Response to Eliminate or Phase Out Open-Water Placement (0042R).
COMMENT	<p>3. How much has occurred in terms of prevention of sediment from filling the harbors and basins e.g. how much stormwater infrastructure has CT installed to help keep the harbors free of sediment?</p> <p>We find the Plan has not addressed prevention of sedimentation, which should have been a high priority of the Plan. It does not quantify programs or means for reducing the amount of sediment accumulating in areas to be dredged. As stated in Appendix E of the Plan, "This is not a quantitative analysis of the amount of sediment entering Long Island Sound or the potential numeric reductions these programs may bring about. These are programs that are currently addressing or could be used to address sediment entering the Long Island Sound watershed."</p>
RESPONSE	Please see General Response to Sediment Reduction Efforts (0009R).

COMMENT	<p>4. Does this Plan comply with the Clean Water Act and the Ocean Dumping Act?</p> <p>As noted by the NYSDOS, "the current procedure for the analysis of alternatives used by the Corps is flawed because all practicable alternatives must be evaluated for compliance with the applicable federal laws, including the Clean Water Act (CWA) and Coastal Zone Management Act (CZMA), prior to selection based on cost." The plan indicates that the dredging projects will be evaluated for compliance individually as needed. Included in the final rule was a requirement that a DMMP address the issue of procedures and standards for evaluating placement alternatives under the Marine Protection, Research, and Sanctuaries Act (MPRSA, also known as the Ocean Dumping Act or ODA), the Clean Water Act (CWA), and other relevant statutes and regulations, for dredging projects in LIS.</p> <p>The plan does go into explanation of the procedures and standards that will be used for USACE authorizations under MPRSA 103 which are also subject to EPA review and concurrence, and the potential for EPA to either veto or add conditions to the permit or civil works approval. The USACE does not issue permits under the CWA or MPRSA for USACE dredged material disposal projects under its civil works authority; rather, it supposedly authorizes its own disposal projects by applying the same substantive and procedural requirements "in lieu of" the permit procedures.</p>
RESPONSE	<p>Yes. As specific future projects are being evaluated for implementation, the USACE will submit the appropriate CZM consistency and coordinate and acquire approvals required by Federal and statutes. Please see our CZM response to NYSDOS/DEC letter of October 9, 2015.</p>
COMMENT	<p>5. Is the USACE requesting any funding through this Plan to help them reduce or eliminate open water disposal?</p> <p>No plan can be realistic if it does not identify costs and potential sources of funding for implementation. It does not appear that this Plan identifies these critical elements for reducing dumping in Long Island Sound. It is stated that if a project exceeds certain criteria then a non-Federal sponsor will need to make up the additional costs. From the plan, "If a beneficial use is selected for a project and that beneficial use happens to be (or be part of) the Federal Base Plan option for the project the costs of that beneficial use are assigned to the navigational purpose of the project. If the project is Federal maintenance dredging then all costs of the Base Plan are Federal. If the project involves improvement dredging the the Base Plan costs are shared with the non-Federal sponsor according to the navigation project depth. Beneficial use project costs exceeding the cost of the Federal Base Plan (Federal Standard) option become either a shared Federal and non-Federal responsibility, or entirely a non-Federal responsibility, depending on the type of beneficial use."</p>

RESPONSE	<p>Please see General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R) and General Response to Cost of Beneficial Use Alternatives (0076R). The Corps has no "regional" funding authority. All funding is done on a project-by-project basis as projects come up for maintenance, or as Sponsors propose partnerships for studies and implementation of improvements or non-base plan beneficial use projects.</p> <p>Further, as the states were informed at the beginning of the DMMP, the USACE has no statutory authority to fund investigations related to sediment or contaminant reduction. The states are working with USEPA, developed information related to ongoing efforts for sediment reduction that is included in the DMMP as an appendix (Appendix E). The USACE has no authority to promulgate any enforceable reduction in open water placement. The USACE does have authority to partner with non-Federal parties in the implementation of certain alternatives to open water placement as described in the DMMP, which could assist in reducing reliance on open water placement.</p>
COMMENT	The Town disagrees with the conclusion of the USACE that, with the safeguards of the present testing and evaluation requirements, and continued monitoring of the sites and the Sound, that open water placement of materials deemed suitable for such, is an environmentally acceptable practice.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	The Town is requesting additional time to review the Plan.
RESPONSE	Please see General Response to Public Involvement (0003R).
COMMENT	Prevention of sedimentation in order to minimize the need for dredging is paramount, the Final Plan should have a quantitative goal of sedimentation reduction for each dredge site.
RESPONSE	Please see General Response to Sediment Reduction Efforts (0009R).
COMMENT	At a minimum it is our belief that any Final Plan should include enforceable goals towards substantial reductions in open water disposal of dredge spoil in the Long Island Sound. There should be strong quantitative goals for reduction of open water dumping for each dredging project identified within the Final Plan. There should be an enforceable overall percentage reduction in projected open water disposal, this goal should be for a 50% or greater reduction.
RESPONSE	As the states were informed at the beginning of the DMMP, the USACE has no statutory authority to fund investigations related to sediment or contaminant reduction. The states are working with USEPA, developed information related to ongoing efforts for sediment reduction that is included in the DMMP as an appendix (Appendix E). The USACE has no authority to promulgate any enforceable reduction in open water placement. The USACE does have authority to partner with non-Federal parties in the implementation of certain alternatives to open water placement as described in the DMMP, which could assist in reducing reliance on open water placement.
COMMENT	Costs and potential funding mechanisms for substantial (greater than 50%) reduction in open water disposal should be enumerated in the Final Plan.
RESPONSE	Please see the General Response to Eliminate or Phase Out Open-Water Placement (0042R).

COMMENT	The Town disagrees with the conclusion of the USACE that, with the safeguards of the present testing and evaluation requirements, and continued monitoring of the sites and the Sound, that open water placement of materials deemed suitable for such, is an environmentally acceptable practice.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
Riverhead Town Councilwoman Jodi Giglio – Letter to NAE – August 20, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1914)	
COMMENT	I am writing to express my strong objections in the matter of the United States Army Corps of Engineers' continued utilization of the Long Island Sound for open-water disposal of dredged materials.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	The use of our waters for dredge soil disposal affects millions of Long Island residents in regard to recreation, industry, and fishing.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	Four dumping sites exist in the Long Island Sound, a small body of water in comparison to the Atlantic Ocean, which has a total of six sites in locations from Maine to Virginia.
RESPONSE	The waters of Long Island Sound, while subject to MPRSA under the Ambro Amendment, are waters within the territorial sea. In New England, in waters outside the territorial sea, there are four ocean disposal sites. There are also dozens of open-water sites within territorial sea waters throughout New England, including the four in Long Island Sound. Long Island Sound is no different than the rest of New England in terms of the number of sites for its length of coastline.
COMMENT	Our sound should not continue to be utilized as a means to discharge soil from sites that are potentially contaminated with toxins.
RESPONSE	Please see General Response to Sediment Contamination (0005R).
Town of Huntington, NY – Letter to NAE – August 18, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1915)	
COMMENT	The Town of Huntington respectfully requests that the Army Corp of Engineers extend the comment period for the Draft Dredged Material Management Plan (DMMP) and the Draft Programmatic Environmental Impact Statement (DPEIS) for Long Island Sound (LIS) to 120 days, a 90-day addition to the scheduled comment period.
RESPONSE	Please see General Response to Public Involvement (0003R).
COMMENT	The Town of Huntington and other interested parties intend to review the documents, which run to 1,000 pages in length, and submit written comments. The Town believes that the comment period for a draft Plan of this magnitude needs to be long enough to permit thoughtful review, analysis and commentary. I wish to join my colleagues in elective office at the Federal, State, County and Local levels, as well environmental advocacy groups like Citizens Campaign for the Environment, who are calling for the Army Corps of Engineers to extend the comment period and thus help facilitate a comprehensive and meaningful review.
RESPONSE	Please see General Response to Public Involvement (0003R).

Correspondence Received from Port Authorities	
New London Port Authority, CT – Letter to NAE – September 25, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1223)	
COMMENT	The New London Port Authority is in full support of the Corps of Engineers DMMP. We consider the evidence based approach to the plan identifies the best financial, environmental, and sustainable means for managing dredged materials.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	<p>The waters of the Thames and adjacent coastal areas are dependent upon skillful and fiscally responsible means of supporting the recreational, commercial, educational, and military requirements of maintaining clear waterways. Specifically these include but are not limited to:</p> <p>Recreation. Marinas in the area are typically owned by family businesses and silt buildup is a problem for both safety and accessibility. Additional costs associated with other disposal alternatives can mean the closure of those businesses if they lack competitiveness when adding those expenses to their fees.</p> <p>Commercial operations. Areas around ferry terminals are critical to the economic requirements of both Connecticut and Long Island, NY to ensure that travel for workers and tourists are safe and accessible. Private shipyards and fuel terminals require clear channels for their operations. Charter excursion businesses rely on safe access along the shoreline. Shell fishing operations cannot withstand the encroachment of silting in their operational areas.</p> <p>Education. The waters around New London and into the sound are the site of significant learning and research activities involving University of Connecticut, Mitchell College, marine sciences secondary education programs, including the Marine Sciences Magnet School in Groton. Additionally, Project O (Project Oceanology) provides learning and research platforms for both secondary education and research funded via private or government subscription. Those efforts are also amplified by studies in coastal ecology conducted by LEARN involving regional secondary school students.</p> <p>Military. Deep channel access is necessary for the continued operations of Naval Submarine Base New London to support missions around the globe. In conjunction with that is the need for proper dredging in the vicinity of General Dynamics Electric Boat. Coast Guard Station New London on the Fort Trumbull peninsula supports rescue, inspection, port security and, through the USCG Auxiliary, safety training for local recreational boaters.</p> <p>Other areas where a fiscally sound disposal plan matter are maintaining the foundations of bridges crossing rivers, maintaining the health of wetlands in the region and allowing for those families relying upon sustenance fishing from the shore, piers, and small craft available to local communities.</p>
RESPONSE	Please see General Response to Dredging Economy (0006R).

New Haven Port Authority, CT – Letter to NAE –September 24, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1232)	
COMMENT	On behalf of the New Haven Port Authority, I want to express the Authority's full support and endorsement of the DRAFT DMMP/PEIS which was recently released. I am well aware of the extraordinary effort put forth by the Corps to collect the initial information from marine operators and businesses on Long Island Sound and its tributaries necessary to estimate the thirty year dredging demand that will be faced, and then to undertake a very thorough process of vetting all cost effective and environmentally safe disposal methods and sites for dredge spoils.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	Although we fully support the beneficial reuse of dredge spoils, where appropriate, at this point in time there does not appear to be an economically feasible option for disposing of dredge spoils from New Haven harbor other than the open water disposal sites located in Long Island Sound.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	We remain confident in the process undertaken by the Corps to test the dredged material before identifying the suitable disposal method and site.
RESPONSE	Please see General Response to Sediment Contamination (0005R).
COMMENT	I do want to restate our concern about the use of the Morris Cove borrow pit for the disposal of contaminated dredge material from Bridgeport harbor. Although the dredging of the channel in Bridgeport harbor is fully supported, the use of the Morris Cove borrow pit as the disposal site for its dredge spoils is not. The environmental benefits of having that pit filled are understood; but, to paraphrase a comment made at the September 17 hearing, if the material borrowed was clean the material being returned to the pit should be clean, as well. I am certain that suitable material can be located in reasonable proximity to the Morris Cove borrow pit to accomplish that goal.
RESPONSE	In response to the many comments received from the public and agencies on the use of the Morris Cove Borrow Pit as a CAD cell, the section of the DMMP in Chapter 4 (Section 4.9.8) describing Morris Cove and its potential use has been expanded to include additional information on CAD cell technology and on the Morris Cove site in particular. Please also see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)
Correspondence Received from Regional Commissions and Chambers	
Manhasset Bay Protection Committee – Letter to NAE – October 13, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-315)	
COMMENT	A definition of "environmentally acceptable" is needed. The US Army Corps of Engineers (ACE) uses the term "environmentally acceptable" multiple times throughout the entire Dredged Material Management Plan, but it is never defined. What is meant by "environmentally acceptable?" If it is defined in separate legislation, please provide a reference.

RESPONSE	Under the Federal Standard (Section 1.3.6 of the DMMP) a placement alternative is considered environmentally acceptable by the Federal agencies if there are no identifiable long term adverse environmental impacts from its use. That requires an analysis of both the site and the materials proposed to be placed at the site, under the requirements of the MPRSA, the CWA, and other statutes and regulations. In its 2004 FEIS for the designation of dredged material placement sites in LIS the EPA concluded that continued use of these sites, consistent with the requirements for sediment testing and suitability, site management and future monitoring, was environmentally acceptable. The more than three decades of research by the USACE under its DAMOS program, and by the EPA and other agencies has confirmed and supported this assessment. Federal law requires the identification, use and management of the sites be determined in accordance principally with the standards proscribed by the MPRSA, the standards used in the 2004 FEIS.
COMMENT	It is unclear what the criteria used to determine suitability of dredged spoils for open-water placement was. There is no definition (or reference) given of the criteria used to determine the acceptability of dredged materials. Please provide reference within the main report (if not specific details) to the location of information pertaining to the criteria used to determine the level of acceptability of dredged materials for placement at the open-water sites.
RESPONSE	Please see General Response to Sediment Contamination and Dredged Material Sampling and Testing (0005R)
COMMENT	Clarification is needed on the statement that 65% of the dredged material produced over the next 30 years "is expected to be fine-grained materials suitable for open water placement." In the Executive Summary, page ES-7, the last paragraph describes the volume of dredged material expected to be produced and what percentage of this is of various grain-sizes. Some clarification is needed on the statement that "65% is expected to be fine-grained materials suitable for open water placement;" is this referring only to the grain size or does it also refer to the contaminant level? If this is referring to both the grain-size and contaminant level, we feel strongly that this estimation is far too high.
RESPONSE	65% is the overall portion of the total 30 year dredging volume that based on past and current sampling and testing results for the various harbors is anticipated to be fine-grained material (greater than 20% fines) which has been determined suitable for open water placement. Suitability involves both chemical and physical testing of the material. Also, see General Response to Sediment Contamination (0005R).
COMMENT	Further investigation of alternatives and beneficial reuses is warranted. The draft DMMP only focuses on the costs associated with the alternatives given and does not appear to consider at all the long-term benefits of utilizing alternatives or beneficial reuses which could perhaps make them cost-competitive with open-water disposal. This seems like a major oversight of the DMMP. If given the opportunity, ACE should pursue the benefits of disposal alternatives and beneficial reuse further as this will certainly help with achieving the goal of phasing out open-water disposal over the next thirty (30) years.
RESPONSE	Please see the General Response to Benefits of and Value Assigned to Beneficial Use Alternatives (0084R)

COMMENT	It is unlikely that material dredged from Manhasset Bay would be suitable for open-water placement. Section 5.18 of the main report covers the Manhasset and Little Neck Bays Area Dredging Center. In this section (specifically page 5-256), the DMMP states that these two bays (Little Neck Bay and Manhasset Bay) would "generate suitable mixed sandy and fine-grained dredged material" for open water placement; however, it is unlikely that sediment dredged from Manhasset Bay would be environmentally acceptable to dump at an ocean site, as this has been the case in recent dredging projects where alternatives had to be found. As Manhasset Bay is lumped in with Little Neck Bay, it is difficult to parse out exact quantities and qualities in the DMMP for further comment.
RESPONSE	Only very limited, and often dated, information on dredged material quality was available from NY harbors. The USACE does not regulate upland placement of dredged material unless wetlands are impacted, and only limited data was made available by state agencies. As projects in these two areas have not proposed using open water placement, recent testing has not even examined its potential use. State testing protocols for upland placement are typically more restrictive than for open water placement due to the proximity of upland sites to human habitation, ground water, and other land uses. Also, most harbors immediately across the Sound in Westchester and Fairfield Counties with similar uses and facilities typically test as suitable for open water placement. The USACE believes that testing using the protocols for ocean placement would show most materials from these two bays to be likely suitable for open water placement. We note that future projects could examine the suitability of open water placement through appropriate sampling and testing if they so chose. Text to this effect has been added to DMMP Section 5.18.2. As Manhasset and Little Neck Bays are in the same dredging center, information on non-Federal projects was aggregated so that individual survey respondents could not be identified, in keeping with the confidentiality requirements of Federal surveys of the general public and private parties. Text to this effect has been added to DMMP Section 5.18.4.
Hempstead Harbor Protection Committee, NY – Letter to NAE – October 8, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-796)	
COMMENT	The draft DMMP has not met the objectives set forth in 2005 by the States of New York and Connecticut and the US EPA in that it does not provide a blueprint for phasing out open water disposal in Long Island Sound.
RESPONSE	Please see the General Response to Eliminate or Phase Out Open-Water Placement (0042R).
COMMENT	The better part of Section 4 is spent discussing why enabling legislation prevents the ACE from drafting a DMMP in the fashion that it was directed to do by the States of New York and Connecticut and the EPA. One of the prime motivations behind the 2005 directive to the ACE was to communicate that the ACE's current mode of operation (i.e. the restrictions imposed by the enabling legislation that it operates under) was unacceptable to the affected stakeholders and needed to be changed in order to facilitate the phase out of open water disposal. Rather than effectuating such changes to the enabling legislation or setting forth the framework to do so, the ACE now points to that very same framework to justify continued use of open water disposal for most of the anticipated dredging needs for the next three decades. If there were reasons why the enabling legislation could not be changed, these reasons should have been made clear to stakeholders at the outset of this ten year process. Since they were not, we find the ACE's failure to proactively communicate these limitations in advance of the formulation of the draft DMMP has contributed to a tremendous waste of public resources.

RESPONSE	The USACE can only work within the statutory framework provided by Congress. The Federal standard as described in the DMMP (Section 1.3.6), limits Federal participation in alternative solutions to the least cost environmentally acceptable alternative. Implementation of other alternatives involves significant non-federal financial participation. These requirements go back several decades and are the framework in which the USACE's beneficial use authorities are implemented.
COMMENT	The ACE uses the term "environmentally acceptable" multiple times throughout the entire draft Dredged Material Management Plan, but it is never fully defined. What is meant by "environmentally acceptable?" If it is defined in separate legislation, please provide a reference.
RESPONSE	Please see Section 404(b)1 of the Clean Water Act.
COMMENT	There is no definition (or reference) given of the criteria used to determine the acceptability of dredged materials. Please provide reference within the main report (if not specific details) to the location of information pertaining to the criteria used to determine the level of acceptability of dredged materials for placement at the open-water sites.
RESPONSE	Please see General Response to Sediment Contamination (0005R).
COMMENT	In the Executive Summary, page ES-7, the last paragraph describes the volume of dredged material expected to be produced and what percentage of this is of various grain-sizes. Some clarification is needed on the statement that "65% is expected to be fine-grained materials suitable for open water placement;" is this referring only to the grain size or does it also refer to the contaminant level? If this is referring to both the grain-size and contaminant level, we feel strongly that this estimation is far too high.
RESPONSE	65% is the overall portion of the total 30 year dredging volume that based on past and current sampling and testing results for the various harbors is anticipated to be fine-grained material (greater than 20% fines) which has been determined suitable for open water placement. Suitability involves both chemical and physical testing of the material. Also, see General Response to Sediment Contamination (0005R).
COMMENT	The draft DMMP only focuses on the costs associated with the alternatives given and does not appear to consider at all the long-term benefits of utilizing alternatives or beneficial reuses which could perhaps make them cost-competitive with open-water disposal. This seems like a major oversight of the DMMP. If given the opportunity, ACE should pursue the benefits of disposal alternatives and beneficial reuse further as this will certainly help with achieving the goal of phasing out open-water disposal over the next thirty (30) years.
RESPONSE	Please see General Response to Benefits of and Value Assigned to Beneficial Use Alternatives (0084R)

COMMENT	<p>The plan states that materials from Hempstead Harbor are assumed to be a mix of sandy and fine-grained materials that would not be suitable for direct beach placement with the least costly disposal being the Western Long Island Sound disposal site. However, it notes that the two most recent non- federal dredging projects next to the federal channel (1999 and 2004) showed that the dredged material was suitable for upland placement as beach nourishment and marsh restoration. It also mentions that the most recent grain size analysis performed in 1982 showed that the harbor sediment was mostly sand (78.6%) with silt (16.7%) and clay (5.1 %). Despite this, the report takes the position that taken as a whole, the sediments show mixed results and are therefore assumed to be too fine--grained for beach placement. As such the Federal Base Plan calls for dredged materials from Hempstead Harbor to be disposed of through open water disposal at the Western Long Island Disposal Site (off of Norwalk Harbor). This overly-conservative approach would all-but rule out beneficial use of this material.</p>
RESPONSE	<p>Given the limited data available, the assumptions for the Hempstead Harbor FNP relied on the breakdown of the 1982 sample, which were more than 20% fines, in excess of what is typically approved for direct beach placement. There were no indications in the records whether material in one area of the channel was more or less sandy than from another area.</p> <p>The report has been revised to state in Section 5.19.2 that "Taken as a whole, this information yields mixed results as to whether harbor sediments are typically coarse or fine grained. For purposes of this DMMP, it is unlikely that any shoal materials from the FNP's in this dredging center, even entrance channel materials, would be found sandy enough to make them suitable for direct beach placement. Future testing for specific projects may prove suitable for nearshore bar placement, or otherwise suitable for open water placement in LIS, or for use in marsh restoration or upland placement."</p> <p>Text has been added to Section 5.19.4 stating "Based on more recent permit data for non-Federal projects, and information provided by the Town of North Hempstead in their letter of October 16, 2015, some amount of the material dredged from non-Federal projects may be sandy material suitable for beach or bar placement. For purposes of this DMMP it is assumed that 50 percent of the future non-Federal material may meet these requirements." Tables 5-185 and 4-1 have been so revised as well, and additional sandy material alternatives have been added to Table 5-186.</p>
COMMENT	<p>The plan notes that a "Confined Disposal Facility" (or "CDF") has been proposed "at Hempstead Harbor along the southwest shoreline ... at a former sand mining company site that could accommodate the needs of other harbors in the western sound with its 2.8 million CY capacity". When analyzing the costs for disposal of sediments from Hempstead Harbor, it determined that it would be significantly less expensive to dispose of the dredged material at the Western Long Island Sound Disposal Site (\$32/CY) than it would be to use the CDF at Hempstead Harbor (\$94/CY). This seems to defy common sense. If it is not economical for a dredging project immediately adjacent to a CDF to use the CDF, then it is hard to imagine that any CDFs would be economical. Further details on the cost calculations are needed.</p>

RESPONSE	The costs of using disposal facilities, such as CDFs and CAD cells include the costs of constructing, operating, and ultimately closing and monitoring those facilities, spread out over their capacity to accept material. It is not surprising that the cost of dredging, plus the cost of re-handling material into a facility, plus the proportionate unit cost of using the facility's capacity, would exceed the cost of dredging and hauling the material to an open water site within a reasonable distance. That is why CDFs are typically only used to receive materials that are unsuitable for open water placement or where open water sites are located a significant distance away from the dredging site v. the CDF. Should state and local interests decide to pursue a CDF in Hempstead Harbor, then site specific studies and estimates for the site's implementation would show what the actual costs and impacts of such a facility were, and what the cost for placement of materials into that facility would be.
Mattituck-Laurel Civic Association, Mattituck, NY – Letter to NAE – Oct 1, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1034)	
COMMENT	The Mattituck-Laurel Civic Association, Inc. (MLCA) calls upon the Army Corp of engineers and the EPA to remove from the Dredged Material Management Plan (DMMP) the open water placement of dredged spoils into the Long Island Sound, as well as the proposed use of 450 acres of Mattituck agricultural land to de-water 2,085,000 cubic yards of dredge spoil.
RESPONSE	The USACE used a systematic method to identify open spaces in the coastal zone of LIS. The land owners of the parcels identified were contacted and interviewed regarding their willingness to use the land for dredged material dewatering. The agricultural fields located on Oregon Road in Mattituck, NY (site NY-1) were identified as "potentially feasible in the future". Multiple (16) private land owners, as well as James McMahon of Southold Department of Public Works, were interviewed regarding these fields. The interview indicated that most of the site is currently in agricultural use (corn, field crops, vineyard, nursery stock, sod); 7 of the 16 parcels have Transferred Development Rights (TDR) to the Town of Southold; per Chapter 70 of the Town Code TDR restricts future uses of the site to agriculture only. Dewatering areas could potentially be constructed on the remaining parcels. It may be possible for the town to approve zoning changes if they desire upland placement opportunities. However, some local officials have requested that this site be removed from consideration for such use. Section 3.8.1 of the PEIS has been updated to indicate that "[d]uring the public review process, local officials requested that this site be removed from further consideration as the Town would not support that use".
COMMENT	The DMMP states that "the Federal Base Plan for any particular project is defined as the least cost environmentally acceptable alternative for constructing the project." Many steps have been taken to improve the water quality of the Sound, and the task of reversing the degradation of this body of water is far from over. Open water dumping is simply not an acceptable environmental alternative.
RESPONSE	Please see General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R)
COMMENT	The US Army Corps AND their consultants have not met with local governments in over seven years. Before any local options are put into a public document, it is imperative that they consult and work with the town, hamlet, area residents and local businesses so that the impact to the community and local economy is fully understood.
RESPONSE	Please see General Response to Adequacy of Agency and Stakeholder Coordination (0074R)

COMMENT	The use of agricultural acreage for de-watering dredge spoils will result in salt being absorbed into the fields, rendering the land unfit for farming. It is simply not an acceptable environmental alternative. Mattituck is an agricultural community, and as expressed by one Southold Town official from Planning Department present at the public meeting in Riverhead, the use of its fields for de-watering is not an option.
RESPONSE	The USACE used a systematic method to identify open spaces in the coastal zone of LIS. The land owners of the parcels identified were contacted and interviewed regarding their willingness to use the land for dredged material dewatering. The agricultural fields located on Oregon Road in Mattituck, NY (site NY-1) were identified as "potentially feasible in the future". Multiple (16) private land owners, as well as James McMahon of Southold Department of Public Works, were interviewed regarding these fields. The interview indicated that most of the site is currently in agricultural use (corn, field crops, vineyard, nursery stock, sod); 7 of the 16 parcels have Transferred Development Rights (TDR) to the Town of Southold; per Chapter 70 of the Town Code TDR restricts future uses of the site to agriculture only. Dewatering areas could potentially be constructed on the remaining parcels. It may be possible for the town to approve zoning changes if they desire upland placement opportunities. However, some local officials have requested that this site be removed from consideration for such use. Section 3.8.1 of the PEIS has been updated to indicate that "[d]uring the public review process, local officials requested that this site be removed from further consideration as the Town would not support that use".
COMMENT	As a general point, and echoing comments made by our Town Supervisor, Scott Russell, the failure to include in the DMMP an outline for logistical requirements such as barging and trucking, and the failure to evaluate impacts to groundwater, prime agricultural soils, and traffic among other key considerations is very poor practice.
RESPONSE	These types of costs and impacts are project specific and could only be evaluated with respect to specific projects as they are proposed and investigated in the future. The DMMP includes typical costs for such activities in the cost matrix used to develop representative placement costs for various placement options but cannot examine specific sites without a particular project.
COMMENT	The Mattituck-Laurel Civic Association asks that the DMMP consider other alternatives. These alternatives might be costlier upfront, but the cost of reversing the damage to our environment and agricultural land, (if the reversal of damage is even possible), will be far greater.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Old Saybrook Chamber of Commerce, CT – Letter to NAE – September 30, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1074)	
COMMENT	The Old Saybrook Chamber of Commerce Board of Directors supports the draft Dredged Material Management Plan. Dredging is vital to our economy and to ensure public access to our waterways. This scientific plan currently under review after a decade of preparation clearly shows that open-water disposal is the most cost-effective and environmentally compatible method of placement without adversely affecting Long Island Sound for the majority of the dredged material. There are four current disposal locations; access to these placement sites is critical.

RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Middlesex County Chamber of Commerce, CT – Letter to NAE – September 28, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1159)	
COMMENT	Several [Middlesex County Chamber of Commerce] member towns are located on Connecticut's shoreline and along the Connecticut River; as such we have an intense interest in the need for dredging so that waterways in and around Long Island Sound will remain navigable. Long Island Sound is a precious natural resource. It is also critical to the well-being of Connecticut's maritime industry which employs 40,000 people and generates about \$9 billion annually to the state's economy.
RESPONSE	The DMMP recognizes the importance of cost-effective navigational dredging to Connecticut's economy, as well as its fishing, boating and tourist industry.
COMMENT	We would like to commend the U.S. Army Corps of Engineers for the work you have done on this draft plan. You've set out options and scenarios for dredging projects that need to occur over the next 30 years to keep our waterways navigable. Without this activity, our maritime sector could collapse. We are fully supportive of the concept of beneficial use and the replenishing of beaches and wetlands using dredged materials where possible.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	As the DMMP discusses, open-water disposal is still needed for many specific dredging projects. Without this option, the cost of dredging will skyrocket and will not be economically feasible. This could have dire effects on marinas and many small businesses in our region. Navigable waterways will help secure the future of Long Island Sound and the economic activities that accrue as a result of this precious natural resource.
RESPONSE	Please see General Response to Availability of Open-Water Alternatives (0041R)
Greater Mystic Chamber of Commerce, CT – Letter to NAE – September 22, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1335)	
COMMENT	I submit this letter on behalf of the Board of Directors of the Greater Mystic Chamber of Commerce in support of the Dredged Material Management Plan (DMMP) recently released by your agency. As a member based organization representing a large demographic of marine based businesses it is imperative that a working waterfront be maintained in order to maintain our economic stability and quality of life in the Greater Mystic area.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	Our [Greater Mystic Chamber of Commerce] Board of Directors recognizes the necessity of the preservation of the environment of our shoreline and Long Island Sound in general. We stand behind the DMMP plan and fear the implications that taking no action on this will lead to. Among them, the closure of Long Island Sound open-water placement locations within a year's time, fewer maintained ports and harbors and significant reduction in access which will come at a substantial economic cost to our regional economy.
RESPONSE	Please see General Response to Dredging Economy (0006R).

COMMENT	Without continued availability of open water disposal sites in Long Island Sound, our [Mystic] region's maritime industry will suffer irreparable damage. Dredging will become economically prohibitive thus allowing silting to clog our waterways. It is important to note that we are a tourist destination which financially impacts every business in our community, and many tourists arrive by private boats and yachts which boosts our local economy. Without navigable waters, this would no longer be viable.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
COMMENT	Finally, it is critical that this plan be approved to preserve a vital natural resource, our beautiful shoreline, for our future generations.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Southeastern Connecticut Council of Governments – Letter to NAE – Sept 18, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1439)	
COMMENT	The Southeastern Connecticut Council of Governments (SCCOG), comprised of the Chief Elected Officials of 23 municipalities in the region, wishes to go on record in support of the Army Corps of Engineers Draft Dredged Material Management Plan and Draft Programmatic Environmental Impact Statement for Long Island Sound. Long Island Sound is critical to our region's and state's economy, supporting a thriving maritime-related commerce which accounts for 40,000 jobs in Connecticut alone. The SCCOG feels this management plan will act to protect the fragile environment of Long Island Sound, and allow this recreational resource and economic generator to thrive for many years to come. We find the plan to take a balanced approach to dredging and the disposal of dredged materials, allowing for options under specific conditions, and the continued monitoring of the impacts resulting from these options.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	The SCCOG believes that as recommended, it is vitally important for our state and region's economy that open water placement of these materials in Long Island Sound continue to be allowed under this plan.
RESPONSE	Please see General Response to Dredging Economy (0006R).
Connecticut Council of Small Towns – Letter to NAE – September 17, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1562)	
COMMENT	Long Island Sound is a treasured natural resource which supports activities such as fishing, tourism, boating and swimming, which contribute significantly to the local economies in this region. Connecticut's small towns recognize the need to protect and restore the Sound and have actively worked to address concerns impacting water quality. Small towns along the coastline are also heavily dependent on the economic activity generated by the marine industry in this region. The marine industry relies on efforts to keep channels and harbors open for navigation.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	The Draft Plan outlines comprehensive recommendations for managing and disposing of various types of dredged materials in an environmentally responsible and cost-effective manner which will ensure that waterways in this region remain navigable. COST applauds the recommendations in the Draft Plan which recognize that continued open-water disposal options for dredging materials are needed to properly maintain channels and harbors to support navigation. Without continued open-space water disposal options, economic activity will decline by an estimated 15%.

	The Draft Plan also identifies alternatives for the handling of dredging materials, including wetlands restoration, which will help protect Long Island Sound. These environmentally sound alternatives reflect a thoughtful, balanced approach to the disposal of dredging materials.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	COST urges adoption of the Draft Plan which will help support continued economic activity in the Long Island sound region while supporting disposal alternatives to help protect this treasured natural resource.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Peconic Estuary Program CEC – Letter to NAE – Postmarked September 16, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1563)	
COMMENT	It is for this reason that we register our strong concern over the adequacy of the draft dredge management plan prepared by the Army Corps of Engineers, and ask that the plan be rejected at this time. Nearly 10 years ago the plan was mandated by New York and Connecticut to be a comprehensive plan to phase out open water disposal of dredged material, but instead the draft DMMP is a plan to continue dumping up to 30-50 million cubic yards of dredged material into the Sound over the next 30 years-perpetuating what had been intended to be phased out instead of developing a more enlightened and responsible way to manage dredged material.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	However, there are safer, more sustainable options for preventing contamination of material that may need to be dredged. This plan was intended to investigate and help implement a modernized, new, and better approach to managing navigation and dredge material. It is here where the plan has its greatest failing. As presented in the plan, a substantial continuation of past practices of dumping dredged material in the Sound is inconsistent with federal and local efforts to protect and restore the Sound. Instead, the draft DMMP is a long-term plan to continue using our Long Island Sound as the main dumping ground for dredged materials. An estimated 17 million cubic yards of dredged material has already been dumped in LIS. This plan seeks to allow an additional 30-50 million cubic yards to be dumped over the next 30 years. The DMMP does not fulfill the mandate set forth in the agreement signed in 2005.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	The evaluations in the draft DMMP and the accompanying Programmatic EIS, assign value in the decision making process only to the cost of beneficial reuse options and omits any and all value to beneficial re-use as a function in protecting the Long Island Sound.

RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	It appears the draft DMMP neglects to assign any value to environmental consequences attributable to open water disposal. In fact, it seems that the document is based on the false premise that open water disposal is environmentally benign. By emphasizing only the short-term costs instead of long-term solutions, the Army Corps fails to live up to the 2005 agreement.
RESPONSE	Please see General Response to Environmental Degradation/Consequences and Economic Cost of Open-Water Placement (0002R)
COMMENT	For these reasons and more, We are respectfully requesting that you reject the proposed plan and require the Army Corp to go back to the original mandate and create a plan that phases out open water dumping in the Sound.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
South Eastern Connecticut Enterprise Region - Letter to NAE - August 26, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1855)	
COMMENT	I am writing today on behalf of the Southeastern Connecticut Enterprise Region Corporation (seCTer) to support the Draft Plan that was released on August 17, 2015.
RESPONSE	Please see General Response on Opposition or Support for the DMMP (DR0004R).
COMMENT	In addition to the critical goal of protecting the Long Island Sound, access to a range of dredged material placement options is absolutely vital to our regional and state economies. According to the DMMP, economic activities that utilize Long Island Sound waterways contribute more than \$9 billion annually in economic output. Additionally, these economic activities support more than 55,000 jobs in the Long Island Sound region. As important, our region is dependent on a range of federal and military facilities, such as the SUBASE New London, dependent on the viability of accessible and cost-effective placement options.
RESPONSE	Please see General Response on Dredging Economy (DR0006R).
COMMENT	If this dredging plan does not move forward, it is estimated that without action the region will see a fifteen percent dip in navigation-dependent economic activity revenue in the next two decades, and significant-and perhaps prohibitive -increases in costs for the private, commercial and federal stakeholders.
RESPONSE	Please see General Response on Dredging Economy (DR0006R).
COMMENT	Thus we applaud the Army Corps for identifying new environmentally sound alternatives for the handling of dredging materials, such as beach nourishment and wetlands restoration. In Connecticut, dredged materials have not only been used for shoreline replenishment, but also for capping landfills and brownfields sites upland. Knowing that only a small portion of dredged materials can be used on land beneficially, we also understand the continued need for open-water disposal options currently in use in Connecticut waters and support continuing this disposal method for fine-grained materials suitable for open-water placement.
RESPONSE	Please see General Response on Open Water Placement (DR0004R).

COMMENT	We look forward to the timely approval of the DMMP and continued constructive
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Correspondence Received from Non-Governmental Organizations and Interest Groups	
Connecticut Fund for the Environment/Save the Sound – Letter to NAE Postmarked September 16, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-21)	
COMMENT	While many agree that dredging is frequently the best means of maintaining safe channels for navigation, accessible marinas for recreation, and open ports for commerce, the material that results from this effort is often seen as a by-product to be discarded rather than a resource to be harnessed. CFE/Save the Sound supports the beneficial re-uses identified in the DMMP, particularly as a resource for habitat restoration and coastal resiliency projects. While the DMMP began the process of evaluating the wide array of beneficial re-use options, it stops far short of being a "comprehensive planning process and decision making tool."
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	Furthermore it fails to provide a sufficient path to significantly "reduce or eliminate the disposal of dredge materials in Long Island Sound," ² the goal agreed upon by New York and Connecticut.
RESPONSE	Please see General Response to DMMP Goal to Eliminate or Reduce Open-Water Placement or Phase Out Open Water Placement (0042R)
COMMENT	[B]eneficial re-use is a real opportunity that requires additional assessment, project identification, and project coordination through the DMMP[.]
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	[A]ny economic analysis used to determine the "feasibility," "practicability," or "viability" of any project, must also include the environmental cost of using the Sound as a disposal facility to fairly reflect the true cost of disposal[.]
RESPONSE	Please see General Response to Environmental Degradation/Consequences and Economic Cost of Open-Water Placement (0002R)
COMMENT	[A]dditional information on the impact of disturbing, transporting, and disposing of nitrogen rich soils must be developed, analyzed, and monitored.
RESPONSE	Please see General Response to Nitrogen Loading (0153R)

COMMENT	<p>The aftermath of Irene and Sandy--the two coastal storms that resulted in record or near-record storm surges within one year's time--indicates that we are living along a coast that is now more storm and flood prone. This unwelcome reality demonstrates the need for a paradigm shift in the way we manage dredge materials. If we are going to work with natural systems to make our coast more resilient, we need to harness the substantial volumes of dredge materials within our region to restore and enhance dune, beach and marsh systems. For proof, we need look no further than the American Littoral Society's rapid coastal assessment of Superstorm Sandy impacts along the Sound's coastline. This quick evaluation, while admittedly incomplete, does an excellent job of providing summaries of impacts to and restoration needs for beach, marsh, and coastal island systems along the Sound. Of those, at least twelve major restoration projects require substantial sediment inputs and nourishment. Unfortunately the DMMP identifies beneficial re-use opportunities but stops short of living up to its title: there is no Material Management Plan for implementing beneficial re-use, only lists of potential next steps. CFE/Save the Sound strongly believes a thorough evaluation of re-use opportunities must be evaluated in more detail; this would include meeting with habitat restoration or re-use entities to gather input and establishing a timeline to ensure coordination between the potential beneficial projects and dredge projects. This careful coordination is needed given the difficulty and lengthy permitting requirements. If this service is not provided through the DMMP, the likelihood of beneficial re-use is extremely slim.</p>
RESPONSE	<p>The DMMP identifies and screens all practicable alternatives, including beneficial use, but does not select a specific alternative for implementation at this time. This is because predicting if and when any particular Federal or non-Federal dredging project may be funded or implemented is not possible until a budget for that project or fiscal year is finalized. Each project proposed for dredging must examine all practicable alternatives including beneficial use. The benefits of those beneficial uses must also be considered and parties proposing beneficial use may be called upon to share in its cost. Moving forward, this will require that timelines for coastal resiliency projects and dredging projects be reexamined each fiscal year to determine what match ups may be available and which state and Federal agencies are willing and capable of participating financially in these projects.</p>
COMMENT	<p>Under the DMMP analysis most beneficial re-use methods are not considered economically practicable, and as such the Corps looks to open water disposal instead. First, protecting Long Island Sound's environmental health is not a dollars in, dollars out proposition. Substantial investment has been made in protecting its water quality, reestablishing its habitats, and safeguarding its wildlife. To have a re-use option that does not impact the Sound available, but not use it because the price tag is somewhat higher than open water disposal runs counter to over forty decades of efforts to protect the Sound.</p>
RESPONSE	<p>Please see General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R)</p> <p>As the DMMP states, future projects will need to conduct their own detailed analysis of beneficial use options, using the DMMP as a guide, to determine if such options are applicable, whether other Federal programs may apply, and whether sponsors are willing and capable of providing the necessary cost-sharing and meeting other aspects of non-Federal responsibility for the project. As the DMMP moves from a plan to implementation the States will need to champion and help fund the detailed studies, design and implementation of beneficial use opportunities.</p>

COMMENT	Second, the equation used to establish that relied on cost is faulty; it is premised on an antiquated view that presumes open water disposal is a free service. In fact, there are environmental costs associated with using the Sound as a disposal site. And these costs are not quantified nor incorporated into the economic evaluation of what constitutes "practicable cost-effective," "economically feasible," "economically practicable," or "economically viable." This failure falsely skews the end disposal site in favor of open water disposal and away from beneficial re-use.
RESPONSE	Please see General Response to Environmental Degradation/Consequences and Economic Cost of Open-Water Placement (0002R)
COMMENT	Long Island Sound has a long history of environmental devastation caused by nitrogen pollution. Efforts to slash this pollution have been active for decades, and progress has been made. However, much work remains if the region is to restore the Sound's health. Scientists have indicated concerns that disturbing the organics and nitrogen rich soils and redepositing them in the Sound, particularly in Western Long Island Sound, could produce magnified nitrogen loading impacts. In short, sediment contains organic material, which starts to decay in the sediment. When that material is dredged and then released in the Sound during dredge disposal, the coarser materials fall quickly while the fine grained and organic material settles more slowly, staying in the water column longer. The bottom-line is that the process adds dissolved nitrogen to the Sound's waters, as well as organic nitrogen. Moving that material into hypoxic waters may lead to rapid digestion, which could release particle bound nitrogen to waters as well: a double whammy to the already stressed ecosystem. It is for this reason, that CFE/Save the Sound requests that additional information on the impact of disturbing, transporting and disposing of nitrogen rich soils be developed, analyzed, and monitored as part of the DMMP process.
RESPONSE	Please see General Response to Nitrogen Loading (0153R)
COMMENT	Relatedly, as a means of expediting and economizing non-Corps dredging projects while also taking environmental concerns into account, we suggest analyzing the benefit of creating a dredging liaison or ombudsman for the whole of Long Island Sound. Such an ombudsman could help coordinate and execute informed, best practices. Specifically, the liaison could guide local yacht clubs and marinas in the preparation and coordination of projects, match dredge materials with potential beneficial re-use projects, as well as organize NY/CT collaborative efforts and any potential shared Confined Aquatic Disposal (CAD) cells.
RESPONSE	The DMMP recommends a continuation of the Regional Dredging Team post-DMMP. One of the RDT's tasks is to champion the implementation and funding of beneficial uses and other alternatives to open-water placement in the future. Interstate and Federal-state partnerships will be key to implementing non-open-water alternatives. The RDT will also continue to review individual dredging projects as they come forward for approvals to ensure that each has adequately investigated all practicable alternatives. The DMMP also recommends that the RDT continue to use the technical working group established during the DMMP to assist in developing and analyzing practicable alternatives.

Connecticut Harbor Management Association - Letter to NAE - October 15, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-82)	
COMMENT	While the CHMA Board supports the goal of reducing the disposal of dredged material in Long Island Sound, it is our opinion that the goal of eliminating open water disposal of dredged material is, for reasons stated below, not an appropriate solution to the current dredging issues and is economically and environmentally unfeasible and unnecessary at the present time.
RESPONSE	Please see General Response to Availability of Open Water Alternatives (0041R).
COMMENT	2. A Federal Standard controlling the planning and implementation of USACE dredging projects is defined in Federal law and USACE regulations. That standard requires that dredging projects be planned, designed, and conducted in the least costly manner that is consistent with proper engineering practices and meets all Federal environmental requirements. In others words, disposal of dredged material must be according to the "least cost, environmentally sound" method. Amendment of this standard would require amendment of Federal law and regulations.
RESPONSE	The USACE concurs with this comment.
COMMENT	Material deemed suitable for open water disposal may be subject to additional sediment management requirements, imposed by the DEEP OLISP, above and beyond the Federal requirements. Suitable material placed in open water disposal sites in Long Island Sound is also subject to rigorous monitoring by the USACE for the purpose of identifying any significant adverse impacts on coastal resources and environmental quality.
RESPONSE	The USACE concurs with this comment.
COMMENT	4. The CHMA Board is aware of no scientific data or study indicating that open water disposal of dredged material in Long Island Sound as currently practiced, managed, and monitored is causing any significant adverse impacts on coastal resources and environmental quality, including water quality.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	Connecticut shows that alternatives to the open water disposal of this fine-grained sediment are economically and environmentally unfeasible for a number of reasons including, but not limited to: a) lack of fine-grained material suitability for beach nourishment and construction applications and for processing in concrete and/or asphalt plants; b) difficulties associated with locating dredged material de-watering facilities necessary to achieve upland disposal; c) problematic nature of truck-borne transportation of dredged material; and d) lack of commercial landfills and other suitable properties for accepting dredged material for landfill or other beneficial purposes.
RESPONSE	The USACE concurs that there can be challenges to beneficial use but still supports the implementation of such projects when available and a non-federal sponsor is willing to contribute to the cost of developing and building the project.
COMMENT	[T]he EPA should revisit the 2005 Final Rule for designation of the CLIS and WLIS sites to incorporate procedures and standards for site use that are consistent with the recommendations of the DMMP.
RESPONSE	The USACE concurs. The DMMP recommendations include procedures and standards that USEPA should consider incorporating in an amendment to the Final Rule of 2005.

COMMENT	<p>It is our experience that such coordination has historically been lacking with regard to Long Island Sound and this lack of coordination, in our opinion, has contributed significantly to the current dredging-related issues.</p> <p>It has long been our opinion that the Connecticut Department of Energy and Environmental Protection and the New York State Department of State -- the coastal management agencies of the states of Connecticut and New York -- should recognize their responsibility to work together cooperatively to address Long Island Sound-wide issues through coordinated and effective planning and coastal management initiatives. We recommend that such coordination and cooperation should be stated as a specific objective of the DMMP.</p>
RESPONSE	Noted. Also, see General Response to Eliminate or Reduce Open-Water Placement (0042R).
COMMENT	8. Continued and increased attention should be given to the implementation (as distinguished from simply the identification) of feasible alternatives to open water disposal of dredged material, including but not limited to use of dredged material for structural and nonstructural fill (including fill for remediation of brownfields sites) and other beneficial applications such as beach nourishment, shore protection to increase coastal resiliency, and habitat creation, including wetland restoration and development of dredged material containment islands that would be managed eventually as wildlife habitat.
RESPONSE	Please see General Response to Eliminate or Reduce Open-Water Placement (0042R).
COMMENT	The U.S. Congress should consider appropriating funds to develop demonstration/pilot programs for alternative methods for beneficial use of dredged material.
RESPONSE	The states and interested public can use the DMMP for examples of potential placement alternatives, or types of beneficial uses, that they might support and seek support for. The USACE can have no opinion on the appropriateness of future legislative actions.
COMMENT	8(b) Amendment of solid waste regulations: Connecticut statutes and regulations concerning solid waste management should be amended as necessary to facilitate the beneficial, environmentally sound use of suitable dredged material for upland applications. The Connecticut DEEP should complete the process of amending those statutes and regulations in the most timely manner according to a specific schedule.
RESPONSE	Comment noted.
COMMENT	8(c) Increased use of Federal hopper dredges: Consideration should be given to increased use of Federal hopper dredges for maintenance of specific channels along the Connecticut coast. To facilitate increased use of these dredges, suitable nearshore dispersal sites for dredged material should be evaluated and designated by the DEEP OLISP in coordination with the USACE, other State and Federal agencies, and local sponsors.
RESPONSE	As part of the LIS DMMP, an inventory of potential near shore placement sites was conducted and a number of sites were identified. Utilizing these sites is not restricted to Federal hopper dredges but may be proposed by any dredging proponent. As projects are funded and pursued in the future where the dredged material consists of sandy grained material near shore placement sites will be part of the placement options that would be evaluated.

COMMENT	9. A meeting of the Long Island Sound Congressional Caucus consisting of members of the U.S. Senate and House of Representatives from the states of Connecticut and New York should be convened in the near future to hear and consider issues affecting the beneficial use and conservation of Long Island Sound. That meeting should include a presentation and discussion of dredging and dredged material management issues, including issues affecting the timely maintenance of Federal navigation projects in Connecticut and New York ports and harbors, as well as presentation and discussion of the DMMP and recommendations for DMMP implementation.
RESPONSE	The USACE supports efforts to address dredging in the LIS in a regional manner. Also, see General Response to Eliminate or Reduce Open-Water Placement (0042R).
COMMENT	In conclusion, we continue to urge all stakeholders concerned with Long Island Sound dredged material management, including governmental agencies, environmental organizations, and business interests, to recognize and respect each others' objectives as important and legitimate, and to work together as partners to resolve the current issues in an objective, balanced, and practical manner.
RESPONSE	The USACE thanks the CHMA for their participation in the review of the DMP and for their comments.
North Fork Environmental Council - Letter to NAE - October 15, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-90)	
COMMENT	The first issue that troubles us is the antiquated processes the USACE has taken with all aspects of this process. And in looking at a draft reported added to the DAMOS page on 11 August 2015, these concerns are backed up by the documentation. First, the USACE said that they worked with local governments in creating the DMMP and its recommendations. So why was it a total surprise to Southold Town officials that agricultural land in the hamlet of Mattituck was identified to receive over 2 million cubic yards (cy) of CT dredge material for de-watering? The answer given in the public hearing was that "someone" checked with the Town and "someone" told them that this was an available site all of this taking place over seven (7) years ago is not acceptable, in theory or practice. And when the USACE consultants replied that the public meetings were the local governments' opportunity to comment on the plan, this is also not acceptable, in theory or practice.
RESPONSE	The USACE used a systematic method to identify open spaces in the coastal zone of LIS. The land owners of the parcels identified were contacted and interviewed regarding their willingness to use the land for dredged material dewatering. The agricultural fields located on Oregon Road in Mattituck, NY (site NY-1) were identified as "potentially feasible in the future". Multiple (16) private land owners, as well as James McMahon of Southold Department of Public Works, were interviewed regarding these fields. The interview indicated that most of the site is currently in agricultural use (corn, field crops, vineyard, nursery stock, sod); 7 of the 16 parcels have Transferred Development Rights (TDR) to the Town of Southold; per Chapter 70 of the Town Code TDR restricts future uses of the site to agriculture only. Dewatering areas could potentially be constructed on the remaining parcels. It may be possible for the town to approve zoning changes if they desire upland placement opportunities. However, some local officials have requested that this site be removed from consideration for such use. Section 3.8.1 of the PEIS has been updated to indicate that "[d]uring the public review process, local officials requested that this site be removed from further consideration as the Town would not support that use".

COMMENT	It is the responsibility of the USACE to communicate and work with all levels of local, regional and state government agencies and departments throughout the entire process, including research, drafting, review and release. This was not done. The NFEC realizes that the more people sitting around the table makes the planning process more burdensome at times but in this day of immediate interactive communication, having frequent and ongoing conversations with local, county and state government officials is easy and cost-effective. And to not talk with government officials for over seven years is ludicrous. Over seven years, a lot could and has happened. Elected officials at all levels of local government Supervisor, Town Board, Town Trustees - change. And with those changes come changes in Planning Boards, Planning Departments and other local departments and committees all of which have a say in any placement of DMMP materials either on land or in the marine environments around the Town.
RESPONSE	Please see General Response to Adequacy of Agency and Stakeholder Coordination (0074R)
COMMENT	<p>And over seven years, other changes take place. A collapse of the LI Sound lobster fishery has occurred. Towns have adopted and/or updated their Local Waterfront Revitalization Plan (LWRP) -a key to what can happen on land and in the marine environment within the Town. Ground and surface water quality has dramatically decreased, causing all Southold Town creeks and inlets to be put on the NYS list of impaired water bodies. In addition, algal blooms fueled by nitrogen loading has appeared earlier, gotten bigger, stayed longer and become more toxic. Eelgrass habitats and other benthic marine plant communities have all but disappeared in many spots, resulting in dramatic decreases in the successful spawning and early growth of several shellfish and finfish populations.</p> <p>All of this and more has taken place and yet the USACE has not taken the time to either connect or, giving it the benefit of the doubt, reconnect with local governments about these and other changes. Nowhere does the draft DMMP reflect these issues and events.</p>
RESPONSE	Please see General Response to Cumulative Impacts (0151R)
COMMENT	Another process issue brought up in the public meetings was that the USACE and its consultants have been working with the CT fishing industry, at times, looking at catch records in order to have another tool to evaluate species populations after dumping events. However, it was disclosed that the same level of coordination wasn't being done with respect to NY commercial fishing operations. The reason given was that NY has a different reporting method from CT. Why should this be a roadblock that the USACE steers around? It should not be such.
RESPONSE	The DMMP PDT attempted to cast a wide net to draw in as much data as other agencies and parties were able to provide for fisheries, and all other resources that were evaluated. Connecticut agencies had significantly more data available on fisheries resources in LIS that they were able to provide to the PDT than did NY agencies. We could only work with the data provided. Going forward, the DMMP recommends continuing the role of the interstate and inter-agency Regional Dredging Team. The RDT, at the state level, should make efforts to improve resource data collection, not just for fisheries but for other resources of concern. That new information should be used by all parties proposing dredging projects in the future to ensure that resource impacts can be minimized, regardless of the placement method used.

COMMENT	<p>If the USACE wants to come to firm conclusions about shellfish and finfish populations being affected by dumping, then this obstacle should be viewed -by all involved -as a opportunity to educate the fisheries in the two states about ways to improve data collection so that the status of the various fisheries in shared waters can be properly measured and evaluated. But again, a lack of communication and effort to start and continue ongoing communication with NY commercial fisheries and their reporting agencies shows a lack of proper and effective process.</p> <p>This also shows why everyone, in both CT and NY, view the DMMP as a CT plan which ignores NY issues and needs. This needs to be corrected. The USACE must work with all relevant partners to identify and define appropriate catch data and procedures as part of any DMMP for it to have any meaningful data on which to base conclusions.</p>
RESPONSE	<p>The DMMP PDT attempted to cast a wide net to draw in as much data as other agencies and parties were able to provide for fisheries, and all other resources that were evaluated. Connecticut agencies had significantly more data available on fisheries resources in LIS that they were able to provide to the PDT than did NY agencies. We could only work with the data provided. Going forward, the DMMP recommends continuing the role of the interstate and inter-agency Regional Dredging Team. The RDT, at the state level, should make efforts to improve resource data collection, not just for fisheries but for other resources of concern. That new information should be used by all parties proposing dredging projects in the future to ensure that resource impacts can be minimized, regardless of the placement method used.</p>
COMMENT	<p>Data Summary Report: New London Disposal Site and Vicinity Sediment-Profile and Plan-View Imaging Survey September 2014</p> <p>In this report, it says, "The most recent survey at NLDS (New London Dump Site) was conducted in July/August 2007 (AECOM 2009). Since the July/August 2007 survey approximately 20,000 cy (15,290 m3) of dredged material has been disposed of at NLDS."</p> <p>What this shows is that despite ongoing dumping activity at the NLDS since 2007, not to mention several severe nor'easters and the tidal effects of hurricanes Irene and Sandy, no DAMOS surveys or data collection has taken place at this sensitive area. Just as it is inexcusable to not communicate and work with various levels of local, county and state government over a seven-year period, it is inexcusable to not do regular and ongoing DAMOS work on this active dump site over the same period of time.</p> <p>As stated in this 2014 report, "Two primary goals of DAMOS confirmatory monitoring surveys are to document the physical location and stability of dredged material placed into the aquatic environment and to evaluate the biological recovery of the benthic community following placement of dredged material."</p> <p>So how can these two primary goals be met if the site is not even being actively surveyed and data collected while active dumping of additional dredge materials has taken place and while the entire LI Sound estuary, from its shores to the its deepest depths, has been pounded by severe winter storms and the effects of nearby hurricanes? The answer is, they cannot be met.</p>

RESPONSE	On an annual basis, the DAMOS Program reviews not only the amount of dredged material placed at all New England aquatic sites, but also the location of each individual scow placement (all scows are required to be outfitted with highly accurate GPS, draft sensor which indicates when a load is released, and data logger). This information is used to prioritize which sites are surveyed in a given year. Survey recommendations are reviewed with the USEPA as well as state officials at New England Regional Dredge Team meetings, held quarterly to make sure that any concerns the states have are addressed. Sites which have had only limited dredged material placement in a given year are generally not surveyed unless an issue had been identified in a previous survey. The New London Disposal Site was visited in 2007 as noted in the comment (DAMOS Contribution #180); in 2010 to collect sediment cores through the dredged material deposits for laboratory analysis as a measure of stability (DAMOS Contribution #189); in 2014 to collect sediment-profile and plan-view imagery (DAMOS Data Report 2014-); and recently in 2015 to perform detailed mapping of the site (DAMOS data report expected in winter 2016 that will evaluate long term stability). Given the nearly 40 years of experience of the DAMOS Program, this monitoring frequency is considered sufficient for the level of placement activity at the New London Disposal Site and the lack of previous issues identified there.
COMMENT	This one example reveals a much wider problem -the current draft DMMP is, for a large part, based on old data. How can the USACE as the drafter or local, county and state governments, as well as the general public, make wise and informed decisions on the DMMP without recent and reliable data? Again, they cannot.
RESPONSE	It was never the intent of the LIS DMMP to collect and analyze samples and data on sediment, water and ecological quality in all the many harbors and projects of Long Island Sound. The DMMP had to rely on existing data, most of which was fairly current, but some of which, particularly in NY waters, was a few decades old. Past history gives a good guide on dredging practices and frequency and future volume expectations. Sediment types are unlikely to change significantly, though a general trend towards cleaner harbor sediments is evident in the regions harbor in all but a few cases, as regulation of discharges in the watersheds, and the impact of other environmental laws and regulations is felt. The identification and screening of placement alternatives was new work based on surveys of state and local officials and landowners. Overall the DMMP sufficiently characterizes the dredging sources and their likely sediment quality, and the range of likely practicable placement alternatives. Detailed evaluations of both the source harbors/projects and the practicable placement alternatives must await site specific studies that can only be conducted as individual projects are funded for design and construction in the future. At that time specific projects, with up-to-date analysis of sediment quality and volume, can be matched with actual available placement alternatives, as the recommendations in the DMMP are implemented, and the goal of reducing reliance on open water placement is pursued under Federal and state agency partnerships.
COMMENT	In a recent public hearing on the preservation of Plum Island, a former NYS official testified that despite claims to the contrary made in the last USACE hearing in Riverhead, NY, there has been no marine life collection and no study of bio-accumulation of pollutants in plants or fish on or around the NLDS.

	<p>In the Appendix to this letter is a partial list of the publicly released reports regarding LI Sound dump sites taken from the USACE website. You will note that in December 2006, report 169, Evaluation of Field Bio-accumulation as a Monitoring Tool, was released. It said, at that time, that bio-accumulation studies of smaller, common benthic animals such as snails, is difficult, costly and because of the organism's size not a clear and reliable measure of accumulated pollutants. However, there has been no other publicly released reports on efforts to undertake meaningful bio-accumulation studies on these or other species.</p> <p>So in fact, this backs up the claim that no marine life collection and no study of bio-accumulation of pollutants in plants or fish on or around the NLDS. The USACE and its consultants say that they rely on visual observation of recovery of certain types of benthic organisms in order to evaluate a site's recovery after dumping. This has two major flaws.</p> <p>First, if you don't do active surveys and data collection of a site during and soon after dumping activity -and this would include visual surveys as well as core sampling and chemical testing of the material lying in the site -how can anyone make a proper evaluation of a site's ongoing and current states? They cannot. And as such work has not occurred at NLDS, any conclusions are based on assumption and not facts.</p> <p>Second, there are plenty of examples where, after catastrophic events, local flora and fauna have recovered quickly and well. However, without bio-accumulation studies one cannot tell if those communities are toxic, either for their own well being or for those up the food chain ... including humans.</p>
RESPONSE	<p>Through a thorough review of collected data, consultations with the USEPA, and consultations with state regulators, the DAMOS Program has worked to strike a balance between collecting sufficient data to identify and understand the impacts associated with aquatic placement of dredged material and not repeating the same types of studies over and over once a process is well understood. A large number of investigations were performed in the early years of the DAMOS Program to understand potential impacts, resulting in the "Integrated, Tiered Approach to Monitoring" (DAMOS Contribution #87). The focused Field Verification Program, performed jointly with the USEPA, consisted of a number of specific investigations to evaluate the ability of the monitoring approach to identify issues (see DAMOS Contribution #175 for a recent summary). It should also be noted that bioaccumulation testing is required for all federal projects placing material into Long Island Sound and for larger private projects or any project with elevated chemical concentrations.</p>
COMMENT	<p>We need comprehensive bio-accumulation studies performed throughout LI Sound to not just evaluate the effects of dumping on marine species but also address the issue of how safe human consumption of local shellfish and finfish species is.</p> <p>Another problem we've noticed with DAMOS operations is that there have been no initial baseline and ongoing studies of benthic communities elsewhere in LI Sound to serve as a control group. What if visual surveys show that certain benthic communities are rapidly reappearing after a dumping operation but that these same species are actually on the decline elsewhere as LI Sound water quality rebounds? This would show that the dumping is possibly bringing a food source -say decomposing organic material -that may not be a natural component of the ecosystem either at this depth or in this location. This is a major problem.</p>

	<p>The USACE also reports show that an assessment of lobster abundance was conducted at the Rhode Island Sound Disposal Site (RISDS) in 2005 as part of the USACE New England District (NAE) Disposal Area Monitoring System (DAMOS) Program. This assessment was designed to evaluate whether the disposal of dredged material from the Providence River and Harbor maintenance dredging project caused negative impacts on lobster populations at the RISDS compared to nearby areas.</p> <p>Such a study was not done in the LI Sound, even after reports of a high die-off rate in the central and eastern regions of the Sound -"coincidentally" around recent activity at the Central, Cornfield Shoals and New England dump sites.</p> <p>This a major flaw in DAMOS. From a scientific standpoint, more work needs to be done. Studies need to be done in three areas: 1) on the site, 2) in close proximity to the site, and 3) in removed control sites. And this research needs to be done immediately before, immediately after and then ongoing after the dumping event. This is not being done, especially at NLDS which serves as the eastern gateway to the entire LI Sound estuary.</p>
RESPONSE	<p>DAMOS Program investigations have included baseline studies with the selection of new sites. Investigations at existing sites include reference areas to serve as a control for comparison so site-collected data. Comprehensive, Long Island Sound-wide studies are outside of the scope of the DAMOS Program and fall under the responsibility of the USEPA sponsored Long Island Sound Study.</p>
COMMENT	<p>The USACE has repeatedly stated that the federal government's position is that the best option is the option of least cost. However, the cost basis used by the USACE for the DMMP is greatly flawed. Just ask any economist or businessman.</p> <p>The USACE bases the costs of dumping solely on the operations of dredging, transportation and dumping. However, the USACE is solely responsible for ongoing monitoring, testing and reporting of the dump sites and their geological and biological integrity and affect on the surrounding environment. That is part and parcel of the USACE's "cost of doing business" but these additional costs are not properly reflected in the costing estimates of each disposal option and this must be addressed, whether the cost comes from the USACE's budget line or from some other government agency. It is still a cost of operations and must be determined and incorporated into the DMMP cost estimates.</p> <p>For example, let's look at a dredging contract which calls for the dredging of the harbor of Stamford, CT, the spoils of which are to be dumped and capped in the Central LI Sound site. The costs for this operation need to reflect the costs of: 1) initial sampling and testing of material to be dredged and formal report of such 2) initial survey, sampling and testing of both biological and geological material at proposed dump site and formal report of such 3) development of site-specific plan for the project, including but not limited to percentage of contaminated materials and its proposed final destination, percentage of materials that can be re-used and their final destination, and percentage of materials unfit for re-use and their final destination -all in consultation of local, county and state officials in which the final destinations of each type of dredge spoils is to be located 4) public posting of all reports and public hearings of such</p> <p>Once a final, approved plan is set:</p> <p>5) cost of RFP process in securing bids and selecting the appropriate contractor</p>

6) cost of dredging, transporting and delivery of dredge material to their final destinations - this must not only include the "hard-dollar" cost of all dumped materials but for materials that require "capping" then the costs must also reflect either "lost revenue" or "lost benefit cost" related to the capping material which, according to the USACE report is typically clean spoils that could be used for beach or habitat restoration, among many other things, had this material not been used for capping

7) cost of ongoing monitoring of dumping operations by third party 8) cost on post dump and capping surveys of the site by USACE, DAMOS and other such studies and reports

These are the true costs of a basic LI Sound dredge spoils dumping operation and must be reflected in the cost analysis. In ALL cases, the cost for LI Sound dumping will increase over what has been presented in the draft DMMP.

Now let's take the same project but with the final destination being a deserted mine in PA. The first four (4) cost segments are basically the same as in the case presented above.

However, everything after step four changes in the following ways:

1) the costs of RFP process in securing bids and selecting the appropriate contractor(s) may be higher do to over-land transportation component 2) the cost of dredging, transporting and delivery of dredge material to their final destinations may actually be less for the following reasons:

a) distance from Stamford harbor to onshore loading may be far less than trip to LI Sound dump site b) no capping material would be needed so that the "lost revenue" and/or "lost benefit cost" would be eliminated c) either the mine operator or PA may be willing to pay for dredge spoils and its transportation as mine fill, thereby offsetting some or all dredge/transportation/dumping costs

3) as the third party contractor is delivering dredge spoils to an onshore loading point for delivery to PA, the USACE does not incur the cost of monitoring transportation of the spoils or the dumping of the spoils in the proper offshore sites, as has been a problem in the past

4) as PA and/or the mine operator already is tasked with monitoring things such as groundwater contamination, gas emissions, air pollution and overall mine safety, the USACE would incur no monitoring costs

And this example does not even take into account the lower costs to the environment -this could be both in terms of habitat loss but also economic loss due to disruption of key fisheries for a period of time -and to any future needed LI Sound remediation projects due to problems associated with LI Sound dumping.

This simplified look represents a true cost analysis the the DMMP and the USACE should re-evaluate all available options and rework all cost estimates taking into account all of these factors which any business operation would have to include in a similar cost analysis. And this is particularly true of a government-based operation. To represent true costs of such a project as only that part coming from USAGC contract or budget line and not take into account costs from other involved government agencies or departments is misleading and not an accurate barometer of costs of the whole project or even costs to the end payer - the taxpayer.

RESPONSE	<p>The cost estimates included in the cost matrix include all costs associated with the dredging project and not just the cost of the dredging contract. Costs include sampling and testing of dredged materials including reports, surveys, preparation of NEPA documents including public notice and comment, preparation of solicitation documents and the bidding process, management and inspection of the construction contract activities, post construction surveys of dredging and placement sites, and any environmental monitoring required for the project. Other costs, in addition to the typical costs described above for any dredging project area also included in the estimates for the several placement alternative types. Upland placement alternatives include costs for design, construction, operation and closure of dewatering facilities allocated on a per CY of capacity basis. Costs also include re-handling, transportation, additional re-handling and management at the final placement site. The cost of acquiring and placing cap material is required for CAD cells is included in the costs for those facilities. Any other costs required for handling and containment of unsuitable dredged materials is included in the costs for the placement alternatives appropriate for those materials. The costs for spreading and planting of marsh restoration sites and monitoring their recovery is included in the costs for those facilities. The cost for spreading, grading, surveying and planting of beach and dune areas is included in the costs for those placement options. It does not matter who pays for any particular aspect of the overall cost of any alternative, the USACE must include and allocate all costs to the estimate for purposes of cost comparison. It should also be noted that capping is a state requirement, and that MPRSA precludes the management of unsuitable material by capping or other management means. The state of Connecticut occasionally requires different suitable materials to be sequentially dredged so that cleaner suitable material is placed atop other suitable material. In LIS both the capped and capping material is typically fine-grained, not beach compatible sandy material. Longer term programmatic studies of the Sound not specifically tied to a particular</p>
COMMENT	<p>In all of the public hearings and reports, there is almost no mention of inorganic material being part of the dredge spoils. This is a gross oversight.</p> <p>We know that CT harbors, like all others, are repositories of all matter coming from upstream. This may be effluent from businesses/factories, effluent from sewage treatment plants, run-off from agricultural lands, decaying organics -leaves, plants, trees, etc. -run-off from roadways and dumping -done intentionally or not -from normal harbor operations which, over the years, could be overboard waste dumping of all kinds, loss of cargo, spills from garbage barges, etc. All of these materials sit at the bottom of these harbors. Some of these materials are still being sent down from the tributaries.</p>

	<p>The writer of this letter has lived on the LI Sound shore in Southold Town within sight of the Cornfield Shoals site for over 55 years. Over the decades, as a kid and an adult, I've watch dumping operations through my telescope. And I can tell you, as other area residents have in letters and emails sent to you, within weeks of the dumping operation and continuing for months after, LI beaches have been the receiver of a dramatic increase in inorganic trash, mainly plastics, such as old degraded plastic bottles, bags, tampon applicators, shotgun shell casings, eating utensils, and more such as Styrofoam food products. So while the USAGE defends the "safety" of the spoils in terms of chemical composition, the other material in the spoils is doing damage to the environment. Looking just at Styrofoam, once it breaks down the tiny polystyrene components start to sink because they're heavier than water, and, according to oceanographer and chemist Charles Moore, "...it's likely that this styrene pollutant is prevalent throughout the water column and not just at the surface." Add to that degraded plastic from the above-noted waste that washed up on our shores after a dumping event, let alone the plastic found from local littering and other source like micro-beads (recently banned in Suffolk County), and you have serious health concerns for marine life and the apex predators, such as humans. According to Mr. Moore's research, along with the toxic chemicals released from the breakdown of plastics, animals also take in other chemicals that the plastic has accumulated from outside sources in the water. So the presence of historical, degraded plastics in the dredge spoils is a real threat to the health of the LI Sound estuary and the animals that live in it on its shores.</p>
RESPONSE	<p>Before any dredged material can be placed at an open-water site, rigorous physical, chemical, and biological testing must be performed. This testing ensures that the placement of dredged material in the sound will not have an environmental impact on the sound's ecology. These test results must be reviewed for each project independently by US EPA and the state regulatory agencies before placement can be approved. Dredged material which fails these test may not be placed in the open waters of the sound and must be confined by some other method. Silty material - a very common product of dredging, particularly unsuitable material - may be used for marsh creation, but has limited beneficial use options because it usually is not compatible with beach nourishment, is not an appropriate construction material, including as an additive to concrete, and has a salt content too high for landscaping.</p>
COMMENT	<p>As we and many others have stated in public comments, letters and emails, the LI Sound has been on a rebound. We have seen cleaner waters, the re-emergence of critical forage fish populations and the rare appearance of porpoise, beluga whales and humpback whales swimming in these waters and staying because of an increasing amount of food sources. That's the good news.</p>
RESPONSE	<p>Please see the General Responses to Sediment Contamination (0005R) and Site Management and Monitoring Plans (SMMPs) for Open Water Placement Sites (0302R)</p>
COMMENT	<p>The bad news is that shellfish populations, especially wild oysters and lobsters are at all time lows, so low that there is now a moratorium on commercial lobstering in the Sound. Is it coincidence that the hardest hit species that haven't rebounded from less frequent dumping of dredge spoils over the last decade are the benthic species? We don't think so. And if the USACE disagrees, then it needs to show the public the scientific data to support its position.</p>
RESPONSE	<p>Please see General Response to Cumulative Impacts (0151R)</p>

COMMENT	[A] lack of a comprehensive process with which to collect, test and measure bio-accumulation in such species -in fact, in all species - not just on but around the dump sites and around remote areas doesn't allow the USACE and its consultants come to a clear, fact-based position for its conclusions. And with a lack of quantitative data, qualitative data - including those findings of long-term residents and fishermen - must be given equal weight.
RESPONSE	Through a thorough review of collected data, consultations with the USEPA, and consultations with state regulators, the DAMOS Program has worked to strike a balance between collecting sufficient data to identify and understand the impacts associated with aquatic placement of dredged material and not repeating the same types of studies over and over once a process is well understood. A large number of investigations were performed in the early years of the DAMOS Program to understand potential impacts, resulting in the "Integrated, Tiered Approach to Monitoring" (DAMOS Contribution #87). The focused Field Verification Program, performed jointly with the USEPA, consisted of a number of specific investigations to evaluate the ability of the monitoring approach to identify issues (see DAMOS Contribution #175 for a recent summary). It should also be noted that bioaccumulation testing is required for all federal projects placing material into Long Island Sound and for larger private projects or any project with elevated chemical concentrations.
COMMENT	Continued dumping in LI Sound is the wrong solution. It creates more potential problems than it answers or solves.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	The NFEC asks the USACE to take a huge step back and re-examine the DMMP process, goals and conclusions. It must redesign its cost models to properly reflect all costs in terms of budget, economic costs and environmental costs. It must then properly look at and value alternative disposal options, also in terms of budget, economic benefits and environmental benefits. No one can argue that the above example of CT dredge spoils being used to fill abandoned mines has fewer benefits and greater long-terms costs than those same spoils being dumped in LI Sound. It's not just common sense. It's a business, economic and environmental reality.
RESPONSE	Please see General Response to Benefits of and Value Assigned to Beneficial Use Alternatives (0084R)
COMMENT	I don't think you heard one voice speak out against the need for dredging critical channels and harbors. But you did hear from many people what happened to their local areas when those spoils were dumped in LI Sound. So it makes sense for the USACE to rethink its DMMP and to follow the course set out for it by both NY and CT governors so many years ago - develop a plan that: 1) reduces and phases out LI Sound dumping of dredge spoils...
RESPONSE	Please see General Response to DMMP Goal to Eliminate or Reduce Open-Water Placement or Phase Out Open Water Placement (0042R)

COMMENT	Past DMMP and DAMOS processes and operations have not been updated to work within new issues and priorities of both CT and NY and the people and businesses who are located on or near LI Sound and rely on its continued rebound to a place a overall health and sustainability. And while they do not fully reflect what's going on in the waters of this estuary of national significance, they do not reflect at all what is going on "on the ground" both around LI Sound but also in extended areas which can make effective use of dredge spoils.
RESPONSE	The USACE DAMOS Program Manager co-chairs the New England Regional Dredge Team (NERDT) along with the USEPA. The NERDT includes representatives from federal agencies as well as from each of the New England states. The NERDT meets quarterly and has a regular agenda that includes updates on past projects/lessons learned, upcoming projects, and beneficial uses of dredged material. One of the main objectives of the NERDT is to ensure that project proponents and regulators alike are aware of current issues, new technologies, and opportunities that are relevant to dredging projects.
COMMENT	The NFEC, its Board of Directors, its members and its friends and supporters do not support this draft DMMP and urge the USACE to go back to the drawing board and work with area partners, especially local and county government officials, agencies and departments, to develop a cost-effective plan that ensures a phase-off of offshore dumping, ensures beneficial re-use of all materials and, above all, ensures the near-and long-term health of LI Sound.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	[So it makes sense for the USACE to rethink its DMMP and to follow the course set out for it by both NY and CT governors so many years ago -develop a plan that:]...and 2) help to identify and, if need be, help to jump start the development of both current and potential alternatives to LI Sound dumping. The current draft DMMP does neither.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Citizens Campaign for the Environment - Letter to NAE - October 14, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-283)	
COMMENT	The 2005 agreement between the states of NY, CT, and the EPA called for the development of a Dredged Materials Management Plan (DMMP), which phases out the antiquated practice of open water dumping in Long Island Sound, while providing guidance and tools for a robust beneficial re-use program. What USACE actually released is a long term plan to continue using our Long Island Sound as the primary waste disposal plan. An estimated 17 million cubic yards of dredged material has already been dumped in LIS. This plan seeks to allow additional 30-50 million cubic yards to be dumped over the next 30 years. The DMMP does not fulfill the mandate set forth in the agreement signed in 2005.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	The evaluations in the draft DMMP and the accompanying Programmatic Environmental Impact Statement (PEIS), assign value in the decision making process only to the cost of beneficial reuse options, and omit any and all value to beneficial re-use as a function in protecting the Long Island Sound. It appears the draft DMMP neglects to assign any value to environmental consequences attributable to open water disposal.

RESPONSE	The economic, societal, and environmental impacts of beneficial use projects for dredged material are measured as the benefit of using the material in those manners, as compared to the incremental cost of implementing such projects in excess of the costs that would occur with the Federal Base Plan, if that is different. Beneficial uses are warranted and justified only if the incremental cost of their design, construction and future maintenance is outweighed by their beneficial impacts. Allocating the benefits of beneficial use alternatives as costs to other plans would be an inappropriate comparison of their relative merits. The benefits of any specific beneficial use alternative can only be determined when evaluated as a placement option for a particular dredging project at the time the project is funded for implementation. Each dredging project and each beneficial use alternative must be evaluated specifically and separately including the willingness of non-Federal partners to participate financially in each proposed project.
COMMENT	In fact, it seems that the document is based on the false premise that open water disposal is environmentally benign.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	1. The DMMP should adopt regulations and disposal guidance that prioritizes environmental impacts over costs. The document appears to be prioritizing the costs of beneficial reuse as the compelling reason to continuing open water dumping. This was NOT the mandate prescribed in the 2005 agreement.
RESPONSE	Please see General Response to Cost of Beneficial Use (0076R).
COMMENT	Unfortunately, the Draft DMMP only evaluates disposal options using cost calculations that act as if adversely impacting the LI Sound is cost effective and free.
RESPONSE	The DMMP evaluated a wide range of disposal options for each of the 50+ FNP's and 27 dredging centers around LIS. These alternatives were screened for a variety of factors, cost was not a screening factor. Costs were used after screening to identify the least cost, environmentally acceptable placement alternative (the likely Federal base plan). The DMMP does not recommend specific placement alternatives for these projects as that would be accomplished as each project is funded for design and implementation in the future.
COMMENT	The Draft DMMP does not take into account the costs of degradation associated with polluting Long Island Sound.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	In section 6.1 of the draft DMMP, there is a chart detailing dredge material disposal options for each federal navigation project. The majority of these projects plan on disposing dredged materials in open water dump sites. The chart does list re-use options, but only to demonstrate that they are not cost-effective. In each cost comparison, the Army Corps focuses solely on the direct costs associated with each option instead of exploring the overall costs and benefits of reuse projects.

RESPONSE	Table 6-1 lists the likely Federal base plan and practicable alternatives to the base plan that may also be pursued in the future. No specific recommendation can be made at this time as that would require future studies and potential non-federal partnership. Under Federal law, beneficial uses which are not the base plan may be pursued if non-federal sponsors elect to participate. The complete range of alternatives considered for each project may be found in Appendix G.
COMMENT	By failing to consider the potential long-term costs of continued dumping in the Sound, or the long-term benefits of beneficial reuse, the draft plan unfairly dismisses beneficial reuse solutions.
RESPONSE	Beneficial use is not being rejected or dismissed, it just requires a level of non-Federal involvement that hasn't been proffered yet and we wouldn't expect that to be proposed until specific projects come up for implementation.
COMMENT	While marshland creation or beach nourishment may carry a higher initial cost, dumping contaminated materials in the Long Island Sound for the next 30 years comes at much a far higher long-term cost.
RESPONSE	Please see General Response to Cost of Beneficial Use (0076R).
COMMENT	Using dredge material to fortify our beaches, improve coastal resiliency, and restore critical habitat is a far better 30 year investment than open water dumping. The Army Corps itself, in section 6.6 of the draft DMMP says, "Continued climate change is expected to increase the demand for using dredged material beneficially, thereby reducing the need for open water placement". Yet the agency chose to ignore this eventuality and instead focused on short-sighted and disingenuous cost comparisons when evaluating beneficial reuse.
RESPONSE	The USACE agrees that in particular cases beneficial uses such as coastal resiliency projects may prove to be a better investment than open water placement. However, studies necessary to support such conclusions can only be carried out when specific projects are funded for detailed NEPA investigations and construction in the future. The DMMP does not use cost as a driving factor, however Federal law requires that the costs of beneficial uses be shared with non-federal sponsors, when those uses are not the Federal base plan.
COMMENT	This Draft DMMP fails to meet the mandate of the 2005 agreement and instead is a 30 year plan to continue dumping in the LI Sound.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	2. Although the DMMP was mandated to focus on re-use alternatives, the proposed DMMP lacks a clear focus on reuse alternatives. While on the surface, the draft DMMP and draft PEIS seem to evaluate many of these environmentally preferred solutions, including beach nourishment, berm placement, near shore bar nourishment, Brownfield redevelopment, backfilling mines, habitat restoration and marsh creation, as well as alternatives such as confined disposal facilities and upland landfills, these documents fail to adequately and holistically consider these options.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	This is despite the fact that some of the re-use options having capacity for all of the identified dredging needs in the plan. In the Army Corps own analysis, noted in section 5.2, page 5-41 of the PEIS, they note that their re-use options could accept 25 million cubic yards of material-which is 50% of the material that is projected to be dredged in the next 30 years.

RESPONSE	Other than open water placement sites, the only alternatives which could accommodate such significant portions of the projected dredge volume over 30 years would be some of the confined disposal facility options described in the DMMP. Such regional CDFs have been developed in other parts of the country, but not without significant non-Federal funding.
COMMENT	<p>Additionally, in the EPA's Final Rule, it clearly states that beneficial re-use options should not be discounted because of higher costs. The Final Rule states, "The final rule recognizes that use of practicable alternative may mean that there will be additional costs (in comparison to open-water disposal). The Final Rule also states that the EPA's ocean dumping regulations defines "practicable alternative" as an alternative which is, "Available at reasonable cost and energy expenditures, which need not be competitive with the costs of ocean dumping, taking into account the environmental benefits derived from such activity, including the relative adverse environmental impacts associated with the use of alternatives to ocean dumping."</p> <p>Unfortunately, this is not the guiding language that the Army Corps uses in evaluating beneficial options for dredged material. The Final Rule recognizes that even when dumping dredged material in the Sound may be "acceptable" there may be more preferable environmental alternatives. These should be used, despite additional costs. Instead of a comprehensive Dredged Material Management plan, the Army Corp provides us a LIS Dumping Plan.</p>
RESPONSE	Please see General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R)
COMMENT	It is also noted in the final rule, that "even if a practicable alternative is available for a portion of the dredged material, it must be used for disposal of that portion of the material in order to at least reduce" the use of open water dumping. Meaning, USACE should clearly not discount that re-use options could accept 50% of material dredged.

RESPONSE	<p>Yes, as specific projects are evaluated in the future, particularly where a project generates more than one classification of material, a combination of disposal alternatives may be used to address the different types of material and/or to help reduce reliance on open water placement. Such plans may require non-Federal financial participation, if they deviate from the Federal Base Plan, but they may be implemented.</p> <p>CDFs are an example of placement facilities typically design to accommodate multiple projects over long periods. The DMMP does not dismiss CDFs or any other alternative. The DMMP identifies a number of CDF opportunities in the LIS region, many of which have been the subject of prior studies over the past four decades. As the comment states, the DMMP does describe CDFs as requiring a significant public investment to implement, and as needing to be coordination between all levels of government, with long-term site management by a state agency or port authority. This is precisely how the large scale CDFs at Norfolk Harbor (Craney island) and Chesapeake Bay (Poplar Island) were developed, built, managed and expanded over the years. In LIS non-Federal interests will need to advocate and sponsor the studies, design and ultimate construction of such facilities if any are ever to be developed. Until that interest and willingness to fund such regional alternatives develops, projects that would fill only a small portion of such facilities have nothing to consider. As with all the alternatives presented, the DMMP is a guide to the USACE, other agencies, the states and private dredging interests as to what alternatives could be considered.</p> <p>Also see General Response to CDFs (0073R).</p>
COMMENT	<p>a. The document fails to thoroughly asses viable alternatives to open water dumping, such as mine reclamation.</p> <p>This same lack of vision found in the beneficial reuse analysis can also be found when evaluating the other alternatives to this project. One major flaw is the choice to focus only on the Long Island Sound instead of considering a regional approach dredged management approach. For example, when considering mine filling, the draft DMMP mentions the Hazelton Mine in Pennsylvania, a 277 acre abandon mine seeking to receive dredge materials. However, this option is quickly dismissed because it is not in the study area and is estimated to be more expensive due to shipping costs (with no data given to support that claim). Failing to thoroughly consider a beneficial project like this one simply because it is outside the watershed is emblematic of the larger problem with this document.</p> <p>Ten years ago, when NY and CT were engaged in a rigorous discussion of beneficial reuse of dredge materials, the Pennsylvania DEP was advocating to take dredged materials to help with the reclamation of over 3,000 abandoned mines throughout their state. They cannot be the only state who has this need, and yet, no mention of this option is in the plan.</p>
RESPONSE	<p>The mine reclamation alternative in Hazelton, Pennsylvania was not dismissed because it is located outside of the study area. It was dismissed because the costs for using this alternative site were calculated and it was significantly more expensive than other alternatives analyzed. Section 4.9.12 of the DMMP has been edited to provide additional discussion of mine reclamation demonstration efforts using dredged marine sediments in Pennsylvania.</p>
COMMENT	<p>b. The document dismisses holistic approaches, such as Confined Disposal Facilities, that have the potential to accommodate all of the proposed dredged material.</p>

	<p>A similar problem arises when discussing Confined Disposal Facilities (CDFs), which are one proven alternative to open water dumping. The Craney Island Dredged Material Management Area in Norfolk, Virginia, which was built in the 1940s, is still held as an example of sustainable dredge material management today. Several of the potential CDF sites mentioned in the draft DMMP have a large enough capacity to "accommodate the entire region's long-term dredging needs", such as the New Haven Breakwaters CDF, which has a capacity of over 52 million CY, with others able to accommodate a large percentage of the materials, including the Stratford Point and Penfield Reef CDFs, which can each handle over 33 million CY (Table 4-11). However, these CDFs were not given adequate consideration.</p> <p>The draft DMMP dismisses CDFs because they "require significant public investment to implement" and there would need to be coordination between all levels of government, with long-term site management by a state agency or port authority. However, this document was meant to provide guidance to these agencies and create a coordinated plan to implement re-use and other alternatives to open water dumping. Stakeholders, agency officials, and elected officials at the local, state, and federal level have been actively involved in shaping this process and working to end the dredge dumping in the Long Island Sound. The plan should not discount options due to a "perceived" lack of public interest or initial funds. The public has already invested millions in Sound restoration measures -that is the investment that we need to be protecting.</p>
RESPONSE	<p>The DMMP does not dismiss CDFs or any other alternative. The DMMP identifies a number of CDF opportunities in the LIS region, many of which have been the subject of prior studies over the past four decades. As the comment states, the DMMP does describe CDFs as requiring a significant public investment to implement, and as needing to be coordination between all levels of government, with long-term site management by a state agency or port authority. This is precisely how the large scale CDFs at Norfolk Harbor (Craney island) and Chesapeake Bay (Poplar Island) were developed, built, managed and expanded over the years. In LIS non-Federal interests will need to advocate and sponsor the studies, design and ultimate construction of such facilities if any are ever to be developed. Until that interest and willingness to fund such regional alternatives develops, projects that would fill only a small portion of such facilities have nothing to consider. As with all the alternatives presented, the DMMP is a guide to the USACE, other agencies, the states and private dredging interests as to what alternatives could be considered.</p>
COMMENT	<p>c. The Draft DMMP relies on dangerous and antiquated nearshore Confined Aquatic Disposal cells for disposal of highly contaminated, untreated dredged materials. In the draft DMMP, USACE recommends the continued use of Confined Aquatic Disposal (CAD) cells for the disposal of contaminated material determined to be "unsuitable" for open water dumping. The three CAD cells identified in the document are the Bridgeport Outer Harbor East and West sites, and the New Haven/Morris Cove borrow pit. "Unsuitable" materials typically contain elevated levels of toxics such as PCB's, VOC's and heavy metals such as mercury, lead and copper. CAD cells built for disposal of contaminated sediments are usually constructed in harbors or rivers, and consist of sub-aqueous borrow pits which are filled with contaminated materials and capped with sand. This practice is dated and counterproductive as it requires disposal of the most toxic, contaminated dredge waste in close proximity to the general public, where the likelihood of impacts to humans and aquatic wildlife are highest.</p>

	The draft DMMP acknowledges that the CAD cells recommended for disposal of unsuitable material are located in Essential Fish Habitat (EFH) areas for Atlantic salmon, winter flounder, windowpane flounder, bluefish, summer flounder and several others, yet offer no additional measures to ensure that contaminated sediments deposited in nearshore CAD cells will not interfere with the health and integrity of these habitats.
RESPONSE	Please see General Response to Confined Aquatic Disposal Cell Development (0008R)
COMMENT	In addition, in the Draft PEIS, Table ES-2 identifies General Impacts by Alternative Type and compares them to open water disposal. Confined Nearshore Placement of Dredged Material (placement in CAD cells) was consistently identified as increasing turbidity and contaminant concentrations potentially leading to intermittent, localized, short term changes in water quality. Page ES-10 indicates CAD cells could destroy and/or bury bottom-dwelling resources living within the footprint. Despite this, USACE's dumping plan prefers the use of CAD cells over treatment and upland disposal methods for contaminated dredged materials, again referencing cost constraints as the limiting factor.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	Continued reliance on CAD cells to dispose of contaminated dredged materials is contradictory to the goals of the 2005 bi-state agreement. A key mandate in this agreement was to reduce the physical impacts that open water disposal can have on aquatic ecosystems and wildlife in LIS, with a focus on more environmentally sustainable and protective alternatives. Instead, the USACE proposes to simply move unsuitable contaminated material from rivers and embayments to other areas that may cause harm. This practice poses inherent risks to the health of LI Sound and its marine life and perpetuates the toxic legacy of dumping in LIS waters.
RESPONSE	Please see General Response to Confined Aquatic Disposal Cell Development (0008R)
COMMENT	3. Under the "No Action Alternative", within the PEIS, USACE appears to have grossly overestimated the costs of eliminating open water disposal. The PEIS claims that if open water dumping is terminated, then the Long Island Sound region would experience losses in the Gross State Product of \$853 million over 20 years. The document goes on to say thousands of jobs would be lost and millions in tax revenue would be lost. CCE is calling on USACE and the EPA to release an independent report that validates these numbers or remove the erroneous numbers from the document. Fear mongering does not belong in science documents.
RESPONSE	The DMMP included an update to the report on the economic need for dredging prepared for the 2004 EPA FEIS (see Technical Supporting Document #3, the 2010 Economic Impact Assessment Update). The Economic Update utilized input-output modeling to characterize the economic importance of navigation-dependent activities in LIS and to estimate the regional economic impacts of the DMMP's No Action Alternative: i.e., no open-water placement. The analysis represents a worst case situation where dredging ceases to be economically viable.
COMMENT	4. The DMMP and the PEIS fail to evaluate the increase in potential harmful pollutants such as Nitrogen and Phosphorus from dumping dredged material.

The Long Island Sound Study created a TMDL for Nitrogen, mandating a 58.5% reduction in nitrogen entering the Sound. This spurred the investment of millions of dollars to upgrade sewage treatment plants discharging into the Sound. Despite the progress, more reductions in Nitrogen are needed, and new science is questioning whether reductions in Phosphorus are needed as well.

In section 4.6 of the PEIS, USACE acknowledges the role that excess nitrogen plays in the deterioration of LIS water quality and the growth of Harmful Algal Blooms that lead to hypoxia. However, the document fails to articulate how much nitrogen is added to the Sound based on their disposal plan of 30-50 million cubic yards of dredged material.

It is understood that dredged materials often contain varying amounts of organic plant matter, which are a significant contributor to nitrogen loading in marine environments. Laboratory studies using sampling data from more than 20 marine testing sites across the U.S. (including Norwalk, Bridgeport and Stamford, CT) show that nitrogen content from dredged sediments can range from approximately 200 to 4,000 mgN/kg, with a mean nitrogen concentration of about 1,550 mgN/kg. These quantities are sufficient to stimulate the growth of excessive amounts of algae and other aquatic plants if they were released in available forms during dredging and disposal (Jones & Lee, 1981)¹.

Studies show that dumping of dredged material increased the release of Nitrogen and Phosphorus into the waterway. A 1.5 million cubic yard dredging project in Baltimore Harbor, which is slated for disposal at a cove south of the downtown, is estimated to have the potential to put more than 200,000 lbs of nitrogen back into the water annually. Due to this increase in Nitrogen, to an already impaired waterway, state regulators are mandated to offset that Nitrogen².

Currently, New York State DEC is engaged in crafting a Nitrogen Action Plan for all Long Island Estuaries including Long Island Sound. The objective is to obtain a science based document that sets nitrogen standards for our waterways in order to ensure the recovery and sustainability of healthy ecosystems. Nitrogen has been identified as the "number one enemy" of poor water quality in the Sound. How will the disposal of dredge material into LIS add to N loading already affecting the Sound? The document fails to review any and all benthic flux conditions that may occur from dredging river bottoms that are loaded with decaying matter into the LIS. In order to fully assess the cumulative impacts of open water dredge disposal in the Sound, the DMMP and PEIS must be revised to quantify the nitrogen and phosphorus loading potential of dredged materials dumped into Long Island Sound.

RESPONSE	<p>No specific evaluation of the potential release of nitrogen and phosphorus from dredged material to the waters of Long Island Sound was provided in the PEIS as it is not considered a significant source relative to input from municipal and industrial wastewater treatment plants, CSOs, direct runoff from land use activities, and direct atmospheric deposition. However, Section 3.5.2 of the DMMP and Section 4.6.1 of the PEIS have been revised to include additional information to better clarify that point. Although great progress has been made in reducing the input of nitrogen and phosphorus from watershed sources, point discharges and direct runoff still release these nutrients to rivers and waterways where they accumulate in the shallow sediment of harbors and channels. In this setting, the nutrients are still available for release to the water column as benthic organisms rework the surficial layer of sediment and with disturbance of sediment by wave action and vessel passage in the shallower, nearshore environment. The mechanical dredging that is typical of New England removes much of this sediment (termed maintenance material, dredged to maintain channel depths) intact with limited release to the water column. With the accurate, targeted placement of the dredged material at the designated sites, sediment that was once spread out as a relatively thin layer over a harbor or waterway is consolidated into a disposal mound that is thicker and covers much smaller area. As these mounds have been demonstrated to be extremely stable features on the seafloor in Long Island Sound, they are sequestering nitrogen and phosphorus that would have otherwise been available for release to the water column. Nevertheless, the Corps recognizes the concerns regarding any and all nutrient loadings to Long Island Sound. As a result, future DAMOS Program monitoring will include elements of nutrient sampling to more fully characterize the potential impacts (and potential benefits) of the consolidation of dredged material at aquatic placement sites.</p> <p>The above response is in relation to maintenance material as noted, that was recently deposited and is expected to contain higher nutrient concentrations. Improvement dredging deepens a harbor or waterway beyond its original depth, and as a result, removes native material (e.g. glacial till, marine clay) that typically has very low nitrogen and phosphorus concentrations.</p>
COMMENT	5. The draft PEIS is deficient in quantifying the effects from open water dumping will have on the LIS water quality, bottomlands, marine species and aquatic ecosystem.
RESPONSE	See General Response for Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	<p>The PEIS ignores the guidance provided by NYS Department of State in their June 3, 2004 Objection to Consistency Determination ruling which, on page 7, requests the EPA analyze a range of parameters that would be affected by disposal activities including:</p> <p>Chemical parameters such as dissolved oxygen (which will be reduced in the water column during dumping activities), carbon dioxide, acidity, dissolved solids, nutrients, organics and pollutants such as heavy metals, toxics and hazardous materials (which will be released in the water column and will be present after dumping is completed.)</p>

RESPONSE	The USACE has been monitoring the effects of open-water placement of dredged material in Long Island Sound for nearly four decades through the Disposal Area Monitoring System or DAMOS Program. Additional information regarding this comprehensive monitoring program has been added to Section 3.21.1 of the DMMP and Section 2.4 of the PEIS. Multiple DAMOS Program investigations as well as investigations by the Corps Engineering Research Development Center (ERDC), the USEPA, and academic researchers have focused on the effects of open-water placement of dredged material. These investigations have demonstrated that open-water placement can be performed with very limited short-term impacts and virtually no long-term impacts to the environment. A summary of this work has been added to Section 3.21.1 of the DMMP and Section 2.4 of the PEIS.
COMMENT	The EPA must consider and evaluate the impacts from different dredging projects. Documentation on sediments from the Thames River, CT is relevant and compelling. Contaminants in this river can bioaccumulate and have far reaching consequences. Sediments in the river contain varying concentration of metals, poly-cyclic aromatic hydrocarbons (PAH), pesticides, PCBs and other chemicals above naturally-occurring background levels.
RESPONSE	In recent projects by the US Navy, dredge material that did not prove suitable for open water placement have instead, been placed in CAD cells in the Lower Thames River, adjacent to the base. Please see General Response to Sediment Contamination (0005R).
COMMENT	As we are aware, LI Sound has historically had a diverse, robust marine fisheries industry. However, the last two decades have seen a dramatic decline in several of the Sound's key species including lobster and winter flounder. The Western Long Island Sound has experienced the greatest decline of marine life and oxygen. It is not yet determined why this is happening, so the additive impacts of dumping dredged materials cannot be simply dismissed for convenience.
RESPONSE	It is clear that all activities that could potentially affect LI Sound waters should be evaluated for potential effects on fisheries and none should be dismissed from that evaluation for convenience. The Corps, USEPA, and states will continue to thoroughly characterize material proposed for dredging and assess the suitability of the material to be used beneficially in some capacity or evaluate responsible placement alternatives when a beneficial use is not identified. Through the DAMOS Program (that predates the decline in fisheries noted in the comment by almost 20 years), the Corps will continue to monitor and publically report the placement and long term disposition of both active and historic in-water dredged material disposal sites. Further, the Corps will continue active participation in the New England Regional Dredge Team, where specific concerns of the states (such as dissolved oxygen impacts) can be incorporated into the objectives of DAMOS Program monitoring. Please also see General Response to Hypoxia (0031R).
COMMENT	Section 4.5 Sediment/Soil Quality, Contaminants and Bioaccumulation, discusses sediment quality and suitability is determined based on the level of contamination and ability to support good ecological functions. However, there does not appear to be a cumulative analysis of ecological impacts associated with dredge materials dumped in the Sound. It is imperative that EPA provide an assessment of cumulative effects of dumping that also assess inputs from all sources into the LI sound. Without a cumulative analysis the assessment to maintain good ecological functions is without merit.

RESPONSE	The USEPA sponsored Long Island Sound Study (www.longislandsoundstudy.net) was formed to address and prioritize the cumulative effects on the ecological systems within Long Island Sound noted in the comment. The Corps is a participant in this study, and provides a link between data collected from monitoring of in-water dredged material placement sites and the overall assessment of cumulative, Sound-wide ecological impacts.
COMMENT	6. According to the PEIS, contaminants within and around the disposal sites are already found, including elevated PCB's in fish and elevated levels of copper in lobsters. The Army Corps fails to address how dumping 30-50 million cubic yards of additional sediment will not add to the contamination.
RESPONSE	Please see General Response to Placing of Dredged Material in the Aquatic Environment (0154R).
COMMENT	<p>The draft PEIS also notes that, "At the active WLDS, CLDS, and NLDS placement areas, the metals silver, copper, cadmium, mercury, and lead were elevated". These elevated levels are very disconcerting. USACE does not present a plan to reduce contaminants already found at disposal sites, nor are there plans to ensure that additional dumping will not add to the contaminants. These heavy metals bioaccumulate and become more harmful in some species over time. In fact, the draft PEIS seems to suggest that contamination at low levels is an acceptable consequence of dredge dumping.</p> <p>Hundreds of millions of dollars have been spent over the last 30 years on restoring the Sound's water quality and reducing toxic contaminants. After years of investments into the health of LIS it is unconscionable that USACE would produce a plan that will knowingly increase contamination into the Sound's waters.</p>
RESPONSE	Please see General Response to Placing of Dredged Material in the Aquatic Environment (0154R). Also, the DMMP's recommendations (See Chapter 7) include investigating historic dredged material placement sites and mounds that pre-date NEPA and its requirements for extensive sampling and testing. It may be found that remediation of these pre-NEPA placement sites may be a practicable use of dredged material found suitable under today's more stringent testing requirements. The RDT would need to consider the benefits of this remediation use as larger dredging projects are proposed in the future.
COMMENT	The plan claims that the New London Disposal Site is a non-dispersive site, yet the Cornfield Shoals Disposal Site is a dispersive site. CCE questions the analysis of the New London site, with its close proximity to the RACE, which has fast moving currents and the Cornfield shoals site, which is a dispersive site.

RESPONSE	<p>For bottom sediment to be scoured at a given location on the seafloor, the movement of the water immediately above the sediment has to exert sufficient force on the individual sediment particles (termed the bottom stress) to either push/roll the particles along the bottom or lift and entrain the particles into the overlying waters. Three possible factors can result in the bottom stress being large enough to characterize a location as dispersive in a setting such as Long Island Sound: 1) Near-bottom tidal currents are sufficiently strong enough during at least some portion of the tidal cycle or some types of tides (e.g. spring tides) to scour surficial sediment; 2) Wave-induced, near-bottom orbital currents are of sufficient magnitude (as during the passage of large storms) to mobilize surficial sediment; and 3) Site depths are shallow enough such that the passage of vessels is sufficient to mobilize surficial sediment through direct prop wash scour or through hull displacement. Characterization of a site as dispersive or potentially dispersive is accomplished by the following means: 1) Direct measurement of bottom currents (e.g. deployed current meters) under a range of conditions; 2) prediction of potential bottom currents using a hydrodynamic model; and 3) sequential mapping of the seafloor to provide an empirical record of sediment loss following higher current events (e.g. passage of a large storm). All three of these types of measurements have been used to characterize the hydrodynamic environment of Long Island Sound. An overview of the Sound-wide hydrodynamic modeling can be found at: http://seagrant.uconn.edu/publications/magazines/wracklines/springsummer07/shapelis.pdf</p> <p>Mapping of the seafloor is provided in DAMOS Contribution #160 for the Cornfield Shoals Site and Contribution #182 for the New London Site (available at http://www.nae.usace.army.mil/Missions/DisposalAreaMonitoringSystem(DAMOS)/Reports.aspx). For the Cornfield Shoals Site, located within the main axis of tidal current in Long Island Sound, the strong bottom currents result in sufficient bottom stress to periodically scour the bottom. As a result, dredged material placed at this site does not form a discernible mound, and is transported away from the site and deposited in lower current areas as part of the overall Sound sediment budget. For the New London Site, located outside of the main axis of tidal current, bottom stress is reduced, and dredged material placed at the site has been shown to form discernible seafloor features, stable over a period of decades that has included the passage of large storms. Note that the bathymetry of both of these sites was mapped again as part of DAMOS surveys in October 2015, and the resulting reports should be posted to the DAMOS website in the spring of 2016.</p>
COMMENT	<p>Cornfield Shoals is identified as a dispersive site, however, the draft DMMP recommends no additional precautions or mitigation for open water disposal at this site. The proposed plan lists 11 federal dredging projects with the proposed preferred "least cost environmentally acceptable" disposal as the Cornfield Shoals Site. The 11 projects could total an additional 2,295,600 cubic yards of material to a site that already has had 1.3 million cubic yards of material dumped. This site is identified by the Corps as a dispersive site because material is known to move during or after placement. Dredged Materials can contain heavy metals, pesticides, and other toxic contaminants and should not be disposed of in places where material is known to be readily transported, contaminating other areas of the Sound. It is unclear why the designation even exists if no differentiating safety criteria are mandated. The plan acts as if dispersal should simply be accepted and not mitigated or better yet, avoided altogether.</p>

RESPONSE	As described in Section 2.1 of the PEIS, dredged material must be characterized as suitable for open-water placement before that alternative can be considered as an option. The characterization process is prescribed; if elevated concentrations of heavy metals, pesticides, or other toxic contaminants were identified, the material could not be placed in an aquatic environment without confinement. As confinement is not possible at a dispersive site such as Cornfield Shoals, such material could not be placed there. Given its high current environment, existing sediment at the Cornfield Shoals Site is coarser than what would be found in a depositional area. As such, for dredged material to be deemed physically compatible for placement at the site (in addition to the suitability based on chemical concentrations), it must be predominantly coarse-grained as well.
COMMENT	9. The draft DMMP and PEIS fail to meet an additional mandate set by EPA, NY, and CT which is to identify ways to reduce overall dredging needs. In the letter signed by the Governors of NY & CT it states, "Alternatives should include, but are not limited to, reducing sediment sources, reducing contaminate loading..." Nowhere in the document does the Army Corps discuss ways to reduce sediment loading and contaminants in our rivers, harbors, and bays. This should have been included in a comprehensive plan that focused on phasing out open water dumping of dredged material.
RESPONSE	Please see General Response to Sediment Reduction Efforts (0009R).
Group for the East End - Letter to NAE - October 12, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-722)	
COMMENT	Group for the East End strongly believes that the Plans, as written, fall woefully short of addressing the ecological impacts of the proposed continued practice of open water disposal and should not be adopted. Although we recognize the importance of dredging for navigational purposes, the Plan's suggestions to allow the continued dumping of roughly 30-50 million cubic yards over the next 30 years, is simply unacceptable given Long Island Sound's ecological, economical and regional significance. For the record, Group for the East End is eastern Long Island's largest professionally staffed environmental advocacy and education organization. Since 1972, we have represented the conservation and community planning interests of some 3,000 member-households, businesses and individuals from across our region.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	Plans Contradict Original Intent to Phase-Out Open Water Disposal In 2005, New York, Connecticut and the United States Environmental Protection Agency called for the creation of the Dredged Materials Management Plan. "On June 3, 2005, EPA issued a final rule to designate the Central Long Island Sound and Western Long Island Sound disposal sites for long-term use, but with restrictions that are intended to reduce or eliminate the disposal of dredged material in Long Island Sound" (www.epa.gov/region1/eco/lisdred/). Further, the EPA rule noted, "the DMMP for Long Island Sound will include the identification of alternatives to open-water disposal and the development of procedures and standards for the use of practicable alternatives to open-water disposal, so as to reduce wherever practicable the open-water disposal of dredged materials."

	Table ES-2, Federal Projects and Likely Base Plans for Placement (ES-9 Draft Executive Summary) illustrates that the likely plan for the vast majority of dredged materials over the next 30 years will be disposed of using the open-water disposal method. Unfortunately, the conclusions drawn in various sections of the Plans suggest that cost is the priority decision-making factor in determining the suitability of utilizing this method and discounts the full range of alternatives (Executive Summary, ES-10; Section 4.9.1 , Summary; Section 6.1).
RESPONSE	<p>The USACE agrees with the commenters that even where the Federal base plan is open water placement, there may be more environmentally beneficial placement options. The DMMP identifies a wide range of alternatives to open water placement for the various projects and dredging centers. The question is not whether or not there are alternatives, but how they must be paid for under Federal law. As described in the DMMP, Section 1.3.6, the USACE is required to identify the least costly environmentally acceptable placement option for dredged material from Federal projects (the Federal Base Plan). The base plan can be a beneficial use, and often is when the material is clean sand and adjacent beaches can be nourished. Where there is a potential beneficial use that is more costly than the base plan the USACE and project sponsors will investigate to determine if economic and environmental benefits of that beneficial use offset any increase in cost over the base plan. If there are sufficient incremental benefits to the beneficial use, then the USACE and project sponsor may share that incremental cost provided a Federal authority exists for that beneficial purpose. Federal authority exists to use dredged material for hurricane and storm damage reduction, flood risk management, and ecosystem restoration. Where the beneficial use is not covered by another Federal authority, or where the economic and environmental benefits of the beneficial use are found not to offset the incremental cost over the base plan, then that beneficial use can still be pursued if the non-Federal sponsor is willing to pay the entire cost over the base plan. In the case of using sand for beach or nearshore bar nourishment purposes state and municipal sponsors have been increasingly willing in recent to pay even the entire cost difference to use that material.</p> <p>As the DMMP states, future projects will need to conduct their own detailed analysis of beneficial use options, using the DMMP as a guide, to determine if such options are applicable, whether other Federal programs may apply, and whether sponsors are willing and capable of providing the necessary cost-sharing and meeting other aspects of non-Federal responsibility for the project. As the DMMP moves from a plan to implementation the States will need to champion and help fund the detailed studies, design and implementation of beneficial use opportunities.</p>
COMMENT	Further, in analyzing the cost issue, it does not appear that the Plans took into consideration the costs associated with the potential negative environmental impacts of continued open-water disposal.
RESPONSE	Please see General Response to Environmental Degradation/Consequences and Economic Cost of Open-Water Placement (0002R)
COMMENT	The Plans should include a discussion of how other areas along the East Coast evaluate alternatives. Rhode Island's model should be considered, as it does not focus on cost alone, rather, prohibits open-water disposal until it can be proven that the practice will not produce negative environmental impacts and alternatives would be more harmful to the environment.

RESPONSE	<p>The RI Ocean Special Area Management Plan (SAMP) was a multi-year, multi-million dollar planning process which examined ocean use conflicts in RI state waters and adjacent waters. The SAMP was primarily focused on resolving conflicts between such uses as offshore wind farms, shipping lanes, fishing areas, and DM disposal sites to ensure that incompatible uses did not overlap. With respect to dredged material placement, the state law requires that if practicable beneficial uses are available, they should be used, but analysis of alternative uses requires a balancing of all factors including cost. The LIS DMMP identified a range of practicable uses and the costs of implementing those uses. Future projects must undertake site-specific alternatives analysis and will like the RI plan, conduct a balancing of the benefits and costs of those alternatives in making final decisions. Federal projects will still be held to the Federal standard in developing their base plans and non-Federal sponsors will still be required to partner in the implementation of alternative placement.</p>
COMMENT	<p>Plans Lack Discussion and Analysis of Impacts of Nitrogen Contamination Associated with Dredged Material</p> <p>The Long Island Sound has a Total Maximum Daily Load for nitrogen with a mandated 58.5% reduction in nitrogen entering the Sound. Additionally, New York State is currently creating a Nitrogen Action Plan for Long Island waterbodies.</p> <p>The Plans fail to discuss and analyze the impacts associated with how much nitrogen could be added to the Sound over the thirty-year period. Studies have illustrated that dredged materials do contain nitrogen and can be found at levels high enough to cause adverse ecological impacts.</p> <p>Recommendation: The Plans should fully quantify and assess how much nitrogen could be added to the Long Island Sound ecosystem and how this could impact existing conditions. The Plans should also discuss how these impacts relate to existing goals to reduce nitrogen pollution in Long Island Sound.</p>
RESPONSE	Please see General Response to Nitrogen Loading (0153R)
COMMENT	<p>Plans Fail to Adequately Address Potential Environmental Impacts of 30--50 Million Yards of Additional Materials</p> <p>Section 4.5 of the DPEIS acknowledges the presence of contaminants in a number of species tested at the sampling locations associated with the open--water disposal sites. For example, "At the active WLDS, CLDS and NLDS placement areas, the metals silver, copper, cadmium, mercury, and lead were elevated (p.4-63, DPEIS). The DPEIS also states, "Mercury was detected in all of the samples and was notably higher in striped bass tissue samples from WLDS, CLDS and NLDS" (p. 4-65). These examples are just two of many that acknowledge contamination.</p> <p>Aside from the recommendation of continued testing, the Plans do not contain provisions to ensure that these situations will not worsen, nor do they contain recommendations for how to mitigate the current situation. In essence, by not recommending mitigation measures or future protocol to ensure that existing conditions will not worsen, the Plans conclude that the environmental impacts of open--water disposal at these sites are acceptable.</p> <p>Recommendation: The Plans should provide a detailed discussion and analysis of how toxic contaminants will be tested for, analyzed and mitigated for all sites utilizing the CAD and open--water disposal methods. Additionally, a robust plan for mitigation measures should include a discussion of how alternative disposal methods could improve or mitigate these circumstances.</p>

RESPONSE	Please see General Response to Sediment Contamination and Dredged Material Sampling and Testing (0005R)
COMMENT	Long Island Sound is an Estuary of National Significance, generating 17-36 billion dollars for the regional economy and is a centerpiece to our regional way of life. Billions of dollars have been allocated to ensure that the ecological health of the Sound is revitalized and preserved.
RESPONSE	Please see General Response to Long Island Sound as an Estuary of National Significance (0015R)
COMMENT	The Plans are undoubtedly flawed and conclude that the practice of open-water disposal should continue for the next 30 years. Alternative methods of disposal were not provided due diligence within the discussion as cost issues remain a priority in the decision-making scheme.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	Please do not adopt the Plans as drafted and fully analyze and consider alternative methods than the proposed open-water disposal method.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
Groton Business Association - Letter to NAE - September 21, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1377)	
COMMENT	We [the Groton Business Association] are writing to express our support for the Dredged Material Management Plan (DMMP) recently released by your agency. We believe access to the placement sites, as outlined in the DMMP plan, must be preserved to provide economically viable dredging solutions, especially for our smaller businesses that rely on navigational access for their livelihood.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	We feel the DMMP plan is an environmentally intelligent plan with its partial clean silt reuse on dry land, but also that the disposal of the fine silt at the indicated placement sites which has been determined will not negatively impact the environment.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	Without continued availability of open water disposal sites in Long Island Sound, our region's maritime industry will suffer irreparable damage. Dredging will become economically prohibitive thus allowing silting to clog our waterways. Connecticut is unique in that it has numerous deltas interfacing with the Sound where silting rapidly occurs, and as a result, our marinas and related feeder businesses would suffer severe financial losses. Additionally, we are a tourist destination, and what is often little recognized is how many tourists arrive by private boats and yachts to boost our local economy. Without navigable waters, this would no longer be viable.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)

COMMENT	Finally, it is imperative that this plan be approved to preserve a vital natural resource, our beautiful shoreline, for our future generations.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Wading River Civic Association - Letter to NAE - September 15, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1625)	
COMMENT	Ten years ago after a heated battle over open-water dumping of dredge spoils in the Long Island Sound New York, Connecticut, the Army Corps of Engineers and the Environmental Protection Agency agreed to design a new plan that would provide alternatives to dumping. Alternatives that would either or eliminate or reduce open-water dumping .Ten years later we are presented a new plan(DMMP) which to put it mildly is a major disappointment. Open-water dumping in the Long Island Sound is not eliminated or reduced but rather increased.
RESPONSE	Please see General Response to DMMP Goal to Eliminate or Reduce Open-Water Placement or Phase Out Open Water Placement (0042R)
COMMENT	What happened? It appears the plan that has opted for short term solutions that put a premium on costs rather than seriously considering a long term plan that "would identify feasible and environmentally sound alternatives and establish future protocols for dredged material management." It is our view that by emphasizing short-term costs instead of long-term solutions, the Army Corps has not lived up to the 2005 agreement.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	The DMMP fails to explain how the dumping of 30-50 million cubic yards of additional sediment will not add to the contamination in the Sound.
RESPONSE	Please see General Response to Sediment Contamination and Dredged Material Sampling and Testing (0005R)
COMMENT	The DMMP does not provide data to show how increased dumping in the Sound will not hinder efforts to reduce Nitrogen levels in the Sound.
RESPONSE	Please see General Response to Nitrogen Loading (0153R)
COMMENT	More importantly the DMMP ignores the monetary costs of degradation and the long term environmental consequences of open water disposal.
RESPONSE	Please see General Response to Environmental Degradation/Consequences and Economic Cost of Open-Water Placement (0002R)
COMMENT	It is our belief that this approach is not in accordance with the EPA's Final Rule. The Final Rule states that the use of practicable (preferential environmental) alternatives may mean there will be additional costs in comparison to open-water disposal.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	In conclusion we do not feel that the DMMP and the PEIS are in accordance with the 2005 mandate to create a plan that would reduce open -water dumping. We respectfully suggest the Army Corps go back and create a plan that actually will eliminate or reduce open-water dumping in the Sound.

RESPONSE	Please see General Response to DMMP Goal to Eliminate or Reduce Open-Water Placement or Phase Out Open Water Placement (0042R)
Sound Beach Civic Association - Letter to NAE - September 8, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1811)	
COMMENT	The Sound Beach Civic Association joins with the many voices on Long Island in opposition to the U.S. Army Corps of Engineers and EPA plan to continue burying dredged spoils in Long Island Sound. Using the Long Island Sound as a dumping ground is simply unacceptable.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	In 1987 the Long Island Sound was designated an estuary of national significance. It is part of what makes Long Island so special. Home to many species of wildlife and serving as a breeding ground for many other species that spend most of their life in the ocean, its water quality needs to be protected. The warmer waters of the Sound have already caused the lobster population to move north to colder waters, and although there currently is an uptake in the fish population, there are still some dead zones.
RESPONSE	Please see General Response to Long Island Sound as an Estuary of National Significance (0015R)
COMMENT	For years municipalities have been working to reverse the degradation caused by years of dumping in its waters. We therefore strongly reject this plan to continue the dumping of dredged spoils into the Sound and call for the reuse of sediments as well as alternatives where possible. Rejecting the possibility of using dredged sediment to rebuild wetlands, restore beaches, cap landfills, etc., as being too costly is again simply unacceptable.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	We realize that identifying feasible and economical alternatives is not as simple as it looks, but it needs to be done. We therefore also join the many voices calling for an extension of the review process. This is important. The public needs more time to review the proposal. The April 30, 2016, deadline is simply not long enough to review a document that took over ten years to develop and is 1300+ pages long. If we know more, then we can ask more educated, better questions.
RESPONSE	Please see General Response to Public Involvement Process-NEPA (0003R)
COMMENT	In summary, rather than choose to turn the Long Island Sound into a garbage dump, it is our hope that the ACE and EPA will hear our voices and allow more time to review the report in order to better address the impact of long-term dumping of dredge spoils in the Long Island Sound and pursue and recommend beneficial uses of dredge sediment.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)

Connecticut Maritime Coalition - Letter to NAE - September 1, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-829)	
COMMENT	This letter is in support of the U.S. Army Corps of Engineers Draft Dredged material Management Plan (DMMP) and Draft Programmatic Environmental Impact Statement (PEIS) for Long Island Sound.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Group for the East End - Letter to NAE - September 11, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1922)	
COMMENT	Extend the comment period for the DMMP and DEIS to 120 days. The proposed 30-day comment period is severely deficient and cannot allow the proper review and consideration by interested parties and the public alike. The proposed documents contain plans that will have ramifications for the next 20 years and beyond. Given the serious nature of the document's content, it is critical that there be adequate time for proper review. Reschedule Public Hearings or Add Additional Public Hearings. The proposed document is set to be released a mere seven and ten days prior to the scheduled public hearings set for August 24th and 27th. Seven to ten days does not provide enough time to review information that is contained in a 1,000-page +plan. Public participation is key to a meaningful planning process. If the public hearings cannot be re-scheduled, please provide additional hearings in October. This will provide a sufficient amount of time for constructive public feedback and participation.
RESPONSE	Please see General Response to Public Involvement Process-NEPA (0003R)
Friends of the Bay (NY) - Letter to NAE - September 10, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1925)	
COMMENT	I write today to request that the comment period and hearing dates for the Draft Management Plan for Dredged Materials and attendant Draft Programmatic Environmental Impact Statement be extended for at least 120 days. The current schedule for public hearings - starting on August 27, 7 days after the projected release date of a 1,000 page document which has been 10 years in the making - does not allow adequate time for those concerned to review the content and formulate their comments.
RESPONSE	Please see General Response to Public Involvement Process-NEPA (0003R)
COMMENT	I expect that most or all of these local government bodies, who share responsibility for these waters, will feel similarly that more time is needed to review this plan. Maintaining water quality in our surface waters is a serious responsibility for all levels of government. Surely it is worth waiting two additional months to ensure that a policy that will constrain our actions decades into the future has the benefit of input from all stakeholders.
RESPONSE	Please see General Response to Public Involvement Process-NEPA (0003R)
Correspondence Received from Private Businesses and Individuals	
General Dynamics, Electric Boat - Letter to NAE - October 14, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-248)	
COMMENT	I write this letter to express General Dynamics Electric Boat's support for the U.S. Army Corps of Engineers (USACE) Draft Dredge Material Management Plan (DMMP) and Draft Programmatic Environmental Impact Statement for Long Island Sound (LIS), which was released on August 17, 2015.

RESPONSE	The USACE thanks General Dynamics for its support of the DMMP.
COMMENT	<p>Economic activity at Electric Boat is forecasted to grow substantially in the next ten years, providing thousands of new jobs to the area. Over 5,000 submarine suppliers in all 50 states across the country will also see economic growth during this time period. Much of this predicted growth will be generated by a new submarine program, the Ohio Replacement program. Programs such as this one come along only once every other generation. The Ohio Replacement program is of great strategic importance not only to the U.S. Navy, but also to U.S. national security.</p> <p>This program will require dredging both in the next three to four years and in the foreseeable future. The DMMP offers many options to support cost effective and environmentally safe dredging disposal, which in turn, will support the economic growth predicted in the submarine shipbuilding industry in Connecticut and across the country. Further, Electric Boat relies on maintenance of deep-water access for delivery of construction materials and submarine modules to the shipyard, transit of submarines for maintenance and modernization, and for final ship delivery to the Navy. Ensuring sufficient and cost-effective disposal options for dredged material is important to maintain these activities to support the U.S. Navy and our country's national defense.</p>
RESPONSE	The USACE understands the important role that General Dynamics and its many subcontractors play in the U.S. Navy's submarine program and our national defense, the impact that the company's employment has on the region, and the importance of practicable cost-effective and environmentally acceptable dredging and dredged material placement alternatives in sustaining that service.
COMMENT	Electric Boat strongly supports the USA CE DMMP. The DMMP is a thorough product, which offers many options for dredging material disposal that take into consideration our country's national defense while balancing environmental and economic concerns.
RESPONSE	The USACE thanks General Dynamics for its support of the DMMP.
Tim Visel, Ivoryton, CT – Letter to NAE – Oct 14, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-277)	
COMMENT	I am writing to support the DMMP plan issued on August 17, 2015. I reference my earlier public hearing statement from September 17th, 2015 as per the economic significance to both states, employment and business opportunities and tax base support which needs no further clarification.
RESPONSE	Please see General Response to Open-Water Placement (0004R).

COMMENT	<p>The DMMP is a summary document to a process that has extended nearly four decades. My concern with the current plan as previously stated in 2012, 2013 and 2014 and those comments refer to sections of the current plan also that describe the dredged material as "fines." "Fines" does not adequately describe the comments made at that time, formation of marine humus or Sapropel commonly referred to as "black mayonnaise." Nowhere in the DMMP can I find a reference or definition of Sapropel, a sulfuric acid, sulfide rich ooze that emits sulfur odors when disturbed. The final plan should include Sapropel and its widely accepted definition. This material is created by the purification of organic matter without oxygen and consists along our shore, mostly as the remains of leaves, primarily oak, which contain a high amount of drought protection, leaf paraffin (wax). Organic matter (leaves) allows sulfate-reducing bacteria (SRB) in heat to slowly digest it, and in the process, naturally complex heavy metals and now it also appears to even concentrate/complex mercury compounds. This condition worsens as Sapropel ages; the bacteria continue to digest it at times creating a deadly sub tidal habitat. Sapropel can produce huge amounts of toxic ammonia and poisonous sulfides including hydrogen sulfide gas (what makes the marsh stink in hot weather). These discharges kill shellfish and finfish eggs upon contact, and aluminum seeps can kill adult fish. As Sapropel continues to age, it discharges methane gas as it concentrates any carbon residues. It has been studied since the 1930s. Fresh marine humus (Sapropel) was a valuable fertilizer harvested from our shores north into the Canadian Maritimes. In fact, the New Haven Agriculture Experiment Station used to issue nitrogen content analysis of "marine mud" for farmers here a century ago. Essex CT and eastern CT Rivers were once producers of Sapropel fertilizer.</p> <p>Sapropel formation is accelerated in hot climate cycles which make full disclosure and discussion of its negative habitat impacts on fish and shellfish populations all the more important. Eastern New York has had Sapropel deposits from Duck farms that operated there (Duck Sludge). Although its presence is now unfortunately very familiar along our shores, its removal by dredging is an activity that can have a positive habitat enhancement or improvement aspect. Therefore, its definition and absence in CFR Subchapter H Part 230 Section 404 (b)(1) - 230.42 - mud flats needs a review, especially as Sapropel's negative habitat impacts are heightened during extended hot/warm climate conditions. The benefits of Sapropel removal (classified as "fines") should be mentioned in the final DMMP. Several states currently are investigating its previous uses as a top dressing upon salt marsh (hay) or its soil nourishment to land. In southern states, it is being recycled into barriers to protect salt marshes in high energy environments. In Europe Sapropel has been declared a "green" fertilizer.</p> <p>There is no reason to allow Sapropel to remain a mystery or for the sulfate-reducing bacterial metal and toxic discharges from it not mentioned. Sulfur and sulfate reducing bacteria have been detailed and reported since the 1930s (attached report by Claude ZoBell, 1939).</p>
RESPONSE	<p>The physical classification of dredge material is currently based upon established criteria defined in the Evaluation of Dredged Material Proposed for Ocean Disposal Testing Manual (the "Green Book") and the Regional Implementation Manual (RIM). It is not within the scope of the DMMP/PEIS to revise material classification designations.</p>

COMMENT	<p>I also would support the Draft Programmatic Environment Impact Statement (PEIS) if it excludes eelgrass as a significant habitat quality indicator. It has a designation as a special aquatic site in CFR Subchapter H - Ocean Dumping Part 230 Section 404(b)(1) --9-1 and mentioned in Chapter 1- Section 230.43 - Vegetated Shallows. I do not support the inclusion of eelgrass in the PEIS as its habitat services now are suspect in a bias use of point in time reference observations often termed "snapshot ecology." The use of these timeframe observations that excludes or ignores marine habitat succession is evident in this case. I see no greater habitat services over time for eelgrass than estuarine shell or cobblestone/kelp forests. It is, however, included in both the Federal description and by name and in Section 230.43 - Vegetated Shallows as a predetermined negative dredging impact to this habitat type or population. This is not accurate; Connecticut and New York should reexamine its eelgrass policies. Also not mentioned are any positive impacts to eelgrass by dredging, falling under a broader category of natural or unnatural bottom disturbance. The habitat history (long term) of eelgrass is actually helped by coastal energy and not hindered as presented in spatial distribution over long periods. Some of the densest eelgrass concentrations occur after cold water storm events, that by the way of natural wave and current "energy," rinses sub-tidal marine soils of acids and improves soil pore water circulation, ridding marine soils of any residual sulfides. It is no different from cultivating terrestrial soil and seeding a terrestrial lawn (eelgrass is a "true" grass). As with any grass, eelgrass is an aggressive and highly successful colonizer (over long periods) of disturbed marine soils. Over time sub-tidal marine soils "age" and they become filled with wax and sticky, and in hot weather, sulfide rich. It is in the soil conditions in high heat that eelgrass naturally dies off as part of the habitat succession process.</p> <p>Dredging or any bottom disturbance that frees sub tidal soils of acids, wax or sulfide can therefore improve soil habitat conditions as to encourage "green and clean" eelgrass growth. These new, healthy eelgrass populations could occur after dredging (channel edges) as would after any storm. In time, however, these eelgrass meadows trap organics, and in heat, become the fungus covered or the brown and furry eelgrass; that is natural. Many years ago when eelgrass got thick, fishers would thin it and purposely cut into it to improve tidal circulation and flows (similar to thinning a row of garden carrots for example). The action of waves and currents after dredging would improve the chances of eelgrass to grow again in the soil representing in a small way successional event after forest fires and terrestrial grasses as hurricanes in Connecticut's past has done; much the same would occur for eelgrass. After coastal energy and cool waters, eelgrass populations naturally expand coverage.</p> <p>Therefore any dredging (soil cultivation) may actually improve or cause new grass growths to occur (such as grass on land) in a long successional habitat reversal. Its position has a negative impact (dredging) over time (energy) and needs a review of the overly positive ecological values. In times of habitat succession, eelgrass has displayed very negative habitat functions and suffocated many forms of shellfish (detailed in numerous state and federal reports).</p>
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	<p>The recent series of Nor'easters and hurricanes have cultivated sub tidal soils in our more exposed sections of eastern Connecticut. A complete habitat history of eelgrass is now essential. It is these areas that should see renewed eelgrass growths from this coastal energy. Section 4.11, pages 4-67 to 4-168: Submerged Aquatic Vegetation habitat services needs a review and rewrite that includes natural temperature and energy natural cycles. Since it is the eastern, more energy prevalent Long Island Sound areas that may see natural eelgrass habitat expansion first, Congressional members of these areas are on copy to this communication as well as marine trades and CT Environment Committee members. As my memorandum from February 25, 2013 detailed, eelgrass may often reestablish itself in marine channels complicating the issuance of any further 401 water quality certificates.</p>
RESPONSE	<p>The DMMP/PEIS presents data on the existing distribution of submerged aquatic vegetation (SAV) found within the study area as well as impacts to SAV from dredging and material placement alternatives that have been documented in scientific literature. The inclusion of this data serves to document that the DMMP/PEIS considered existing SAV resources within the study area and considered known impacts to the existing resource from dredging and placement activities. While the statements by the commenter concerning the beneficial impacts of dredging to SAV may be valid, no scientific literature exists to support these statements and therefore they cannot be incorporated into the DMMP/PEIS at this time. Additionally, as the DMMP/PEIS is not a decision document, a specific discussion of Connecticut and New York's policies regarding the SAV in the issuance of watery quality certifications are not within the scope of the study.</p>
<p align="center">Emily May, Lloyd Harbor, NY – Letter to NAE – October 14, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-293)</p>	
COMMENT	<p>As a Lloyd Harbor, New York resident and a member of the Lloyd Harbor Conservation board, I am outraged by the planned dumping of Connecticut's dredge material in the Long Island Sound- in New York State waters. This is a travesty. Connecticut's rivers would be dredged to keep them navigable for Connecticut's industry and commerce while dredge material is then dumped in Long Island waters harming our navigation, industry, human and aquatic health.</p>
RESPONSE	<p>The DMMP identifies and screens all practicable alternatives, including beneficial use, but does not select a specific alternative for implementation at this time. The Project Development Team for the DMMP, which developed the inventory of placement alternative types, included Federal and state agencies from the three states. The screening evaluated 149 alternatives, including several beneficial use categories, which resulted in over 14,000 project-alternative site pairings. In the future, when dredging is being proposed for specific sites, the DMMP alternatives will be a place to start to review the viability of these alternatives as well as any additional alternatives that would be appropriate. The USACE is required by Federal law to identify a base plan which consists of the least costly, environmentally acceptable alternative, consistent with the requirements of the Clean Water Act, MPRSA, and other applicable laws. However, other USACE programs are available for alternative placement opportunities if non-Federal partners are willing to participate in their implementation. The beneficial use alternatives that are feasible are highly dependent on the physical characteristics of the material. Silt material; a very common product of dredging; may be used for marsh creation, but has limited beneficial use options because it usually is not compatible with beach nourishment, is not an appropriate construction material, and has a salt content too high for landscaping.</p>

COMMENT	These materials, which are planned to be dredged from Connecticut's rivers and dumped near our homes and beaches, would not only fill in our beautiful harbors, making these waterways less useful for Long Islanders.
RESPONSE	With the nearly 40 year record of DAMOS surveys, there have been multiple opportunities to evaluate the passage of large storms (both hurricanes and nor'easters) on the dredged material deposits on the seafloor. As discussed in Section 4.4.1 of the PEIS, these investigations have demonstrated long-term stability of the deposits even at the most exposed energy sites.
COMMENT	[These materials] are also laden with chemicals and heavy metals from Connecticut's Industrial activity endangering swimmers' health and polluting our waters.
RESPONSE	Please see General Response to Sediment Contamination (0005R).
COMMENT	Moreover, these dredge materials, which are too tainted to be dumped out at sea under the Federal Clean Water regulations would be dumped closer to human swimming and fishing activity simply because the State's standards are less rigorous than the Federal legislation. From a human health standpoint, it is an abomination that Long Island is the trash receptacle for Connecticut's pollutants.
RESPONSE	Please see General Response to Morris Cove Alternative (0148R).
COMMENT	And from an economic perspective, our [Long Island, NY] economy is vastly dependent upon the use of our waters, just as Connecticut is dependent upon use of their waterways. Long Island and the Long Island Sound has long been known for its wonderful fishing and seafood such as oysters and clams. Fishing and the seafood industry represent a huge portion of Long Island's economy, as well as sailing, boating, kayaking, water skiing, swimming and more. People flock to areas all along Long Island's North Shore for these nautical activities.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-
COMMENT	While Long Island has experienced a decline in water quality for our surrounding waters in recent years, many groups of concerned citizens, across the Island, are working hard to bring these waters back to their once, clean, abundant and thriving ecosystems.
RESPONSE	Please see the General Responses to Sediment Contamination (0005R) and Site Management and Monitoring Plans (SMMPs) (0302R).
COMMENT	We will not sit idly by as Connecticut dumps in our backyard. This is not an acceptable solution for Connecticut's waste.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
Brewer Yacht Yard Group, Warwick, RI – Letter to NAE – October 13, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-304)	
COMMENT	The ability to regularly conduct dredging operations at a reasonable cost is vital to our operations and the sustainability of our industry. Continued access to open-water disposal in Long Island Sound is the only way that we can conduct these operations in an efficient and cost effective manner.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	The draft DMMP clearly demonstrates that open-water disposal is the most cost-effective and environmentally compatible method of handling dredge material originating from the Long Island Sound watershed.

RESPONSE	Please see General Response to Availability of Open Water Alternatives (0041R).
COMMENT	With the ever increasing regulatory framework developing around our industry, small businesses already face escalating expenses in daily operations. We are already limited to short dredge windows and intense scrutiny when digging and then offloading materials from barges. Closing off access to the open-water disposal sites would be the final nail in the coffin for many of us.
RESPONSE	The DMMP recognizes the importance of cost-effective navigational dredging to the regional economy, as well as its fishing, boating and tourist industry.
COMMENT	Failing to act of this plan would result in skyrocketing dredging costs, fewer maintained ports and harbors and a reduction in access that will substantially weaken the regional economy.
RESPONSE	Please see General Response to Dredging Economy (0006R).
John Cox, New Haven, CT – Letter to NAE – October 12, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-710)	
COMMENT	I, and many of my neighbors, were actively involved five years ago when the concept of
RESPONSE	Please see General Response to Morris Cove Alternative (0148R).
COMMENT	The report, prepared in 2010 as part of the Bridgeport plan, contained several important infirmities: 1. It was based on an 8 year old analysis. Now that analysis is 13 years old. New Haven Harbormaster and Navy diver Michael Pirner, who is familiar with the borrow pit, stated in 2010 that it is in constant change. Surely a new analysis is warranted.
RESPONSE	Please see General Response to Morris Cove Alternative (0148R).
COMMENT	2. The unique ground water situation in Morris Cove was not addressed in 2010 or now. A study is needed to determine whether the toxic material will enter the high water table
RESPONSE	Please see General Response to Morris Cove Alternative (0148R).
COMMENT	3. Morris Cove is a residential community and the source of recreational activities for people throughout the City and the region, as it has the only sandy beaches on the Sound in New Haven. Having the toxic sludge dropped in Morris Cove and uncovered for 9-12 months would eliminate swimming, kayaking, paddle boarding, fishing and water skiing for an entire season. And even with a cap, there is no guarantee that the water would again be usable for marine recreation.
RESPONSE	Please see General Response to Morris Cove Alternative (0148R).
COMMENT	4. The economic analysis, which drove the Corps choice of Morris Cove for dumping the Bridgeport toxic sludge, was flawed. No funds were identified to compensate the New Haven oyster farmers, whose operations would be disrupted. The Cross Sound Cable project included compensation of \$5 M for this disruption. The cost effective choice changes when an appropriate economic study is conducted.
RESPONSE	Please see General Response to Morris Cove Alternative (0148R).
COMMENT	I also believe that filling the Morris Cove borrow pit, but not with toxic material, will offer important environmental benefits by eliminating an ecological dead zone. In fact, one interesting idea put forward at the public meeting was allowing the marinas, whose dredged material is clean, to place it into the borrow pit to begin the process of refilling it with clean material.
RESPONSE	Please see General Response to Morris Cove Alternative (0148R).

COMMENT	During the public process associated with the Bridgeport plan, the Morris Cove community provided a significant amount of scientific and empirical information for the record. I believe that there would be value including that information in the public record of this proceeding.
RESPONSE	Please see General Response to Morris Cove Alternative (0148R).
COMMENT	In closing, I would like to thank the ACE for the more open approach to the public this time in contrast to the 2010 experience. In particular, I commend Colonel Christopher Barron for being actively involved at the New Haven meeting, making eye contact and listening to speakers, taking notes on key points and conducting an informal sharing of ideas following the formal meeting.
RESPONSE	Please see General Response to Public Involvement (0003R).
COMMENT	I understand that this is a draft and not a decision document, but I hope that some of the concerns raised about the Morris Cove borrow pit will be acknowledged in the final document.
RESPONSE	Please see General Response to Morris Cove Alternative (0148R).
Sound Beach Property Owners Association – Letter to NAE – October 6, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-879)	
COMMENT	Having attended the USACE public hearing in Port Jefferson on 8/24/15 we, members of the Sound Beach Property Owners Association, have some comments on the Federal Navigation Project to maintain shipping channels in Connecticut rivers and harbors. Looking at disposal sites for dredged material in and around Long Island Sound responders to the reports by Mr. Mark Habel and yourself pointed out that tidal flows bring the dredgings all over the waters of the Sound. This is particularly so from eastern sites such as the New London and Cornfield Shoals Disposal Sites, some of dredged material being unsuitable.
RESPONSE	With the nearly 40 year record of DAMOS surveys, there have been multiple opportunities to evaluate the passage of large storms (both hurricanes and nor'easters) on the dredged material deposits on the seafloor. As discussed in Section 4.4.1 of the PEIS, these investigations have demonstrated long-term stability of the deposits even at the most exposed energy sites.
COMMENT	Since the shipping channels are in Connecticut it is not appropriate that New York's Long Island has to suffer the pollution of its waters which puts swimmers at risk and contaminates the fish that people eat. Other places should be found for disposal of the dredged materials and the cost needs to be born by Connecticut, aided by federal funds.
RESPONSE	Please see General Response to Open-Water Placement (0004R).

Docko, Inc., Mystic, CT – Letter to NAE – October 5, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-909)	
COMMENT	As a follow up to my brief testimony in Long Island Sound in New London on August 27, 2015 during your public presentation of the DMMP and DEIS for open water disposal of dredged sediments I would just like to offer one point of view that was not discussed by any of the other speakers. New York State, the Department of State in particular, has not been cooperative or agreeable in this effort at all. It is ironic that New York can be so disagreeable and contrary in the use of open water disposal when many projects from New York utilize the Western or Central Long Island Sound open water disposal sites for their dredge projects each year.
RESPONSE	The USACE stresses that for the DMMP to be successful in moving forward and achieving the goal of reducing, where practicable, the reliance on open-water disposal in LIS, that all agencies including state participants in the RDT must cooperatively approach the issues of funding and implementing beneficial uses and other alternatives to open-water placement. This effort cannot succeed without the sustained cooperation of the states involved.
COMMENT	It is also hard to accept statements by various residents who spoke at the Long Island presentations that Connecticut's discharges into Long Island Sound are "industrial" compared to the residential nature of Long Island's discharges. This point of view completely ignores the obvious storm water discharges from streets, Villages, Cities of Suffolk County and the Municipal infrastructure and the heavily populated areas of Nassau County, Queens County, the Bronx and Westchester whose storm water discharges get into the west end of the Sound.
RESPONSE	Thank you. Your comment has been noted.
COMMENT	Clearly your DMMP and DEIS have endeavored to be objective and balance these concerns of all neighbors on Long Island Sound. I support the DMMP and the DEIS. I applaud the time and effort that have gone into the process and I agree with your findings.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
Barbara D., Massapequa, NY – Letter to NAE – October 5, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-911)	
COMMENT	I live in Massapequa Long Island. I am writing this letter to voice my opinion about our enviornment. The world is changing not for the better, but for the worst. We are polluting out air, water, ocean's. More people young and old are coming down with disease a lot coming from pollutants. We cannot ignore this matter, its important to humans, wildlife etc, down the road much more has to be done to protect us. It must be done in a beneficial way. Long Island is very important to us. We are a community that must stay strong for ourselves & our children. We must keep our air, water, and our enviornment from becoming toxic. Please listen to us. We as a community must fight for ourselves. Please take this matter serious.

RESPONSE	Before any dredged material can be placed at an open-water site, rigorous physical, chemical, and biological testing must be performed. This testing ensures that the placement of dredged material in the sound will not have an environmental impact on the sound's ecology. These test results must be reviewed for each project independently by US EPA and the state regulatory agencies before placement can be approved. Dredged material which fails these test may not be placed in the open waters of the sound and must be confined by some other method. Silty material - a very common product of dredging, particularly unsuitable material - may be used for marsh creation, but has limited beneficial use options because it usually is not compatible with beach nourishment, is not an appropriate construction material, including as an additive to concrete, and has a salt content too high for landscaping.
COMMENT	I also oppose the plan to dump in Long Island. A much better plan has to be put on the table!
RESPONSE	Please see General Response to Open-Water Placement (0004R).
Joe and Nancy Kmetz, Shelton, CT - Letter FW to NAE by CCE October 5, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-962)	
COMMENT	I was contacted by a group of concerned Citizens Campaign for dumping hazardous waste into Long Island sound. I can't believe that the government would allow for such dumping, I am a boater and we are not allowed to dump waste into the sound. How could the government allow dumping toxic waste into Long Island Sound? First of all the government stopped the fishing of Lobsters to try to get the population back. I also go clamming [clamming] how could you allow dumping of toxic waste to damage our Long Island Sound? How will we be able to eat any sea food taken from Long Island Sound? Please have your office look into this matter and stop the dumping.
RESPONSE	Please see General Response to Sediment Contamination (0005R). First and foremost, the disposal of dredged material at aquatic sites in Long Island Sound absolutely does not allow disposal of hazardous waste or toxic waste. The determination of what type of dredged sediment is deemed as suitable is governed under the strict regulation of the Clean Water Act (CWA) and Marine Protection Research and Sanctuaries Act (MPRSA), as described in Section 2.1 of the PEIS. The testing required under the regulations implementing these statutes is precisely aimed at maintaining quality of the marine environment such that seafood from the area can be eaten. However, until the passage of the CWA and MPRSA in the early 1970s, industrial and municipal wastewater, solid wastes and debris, and dredged material as well were all discharged or disposed into waters of Long Island Sound with little or no regulation. This represents nearly 200 years of unchecked discharge and disposal from the start of the industrial revolution until passage of this 1970s legislation. The currently active placement sites in Long Island Sound show up as general areas of disposal in historical documents long before the CWA and MPRSA, and as a result, some of the sediment at these sites contains elevated contaminant concentrations due to their past use. That history of disposal was a contributing factor to their selection and current use as dredged material placement sites. The ongoing placement of dredged material at these sites, again material deemed as suitable under the strict regulation of the CWA and MPRSA, is now methodically covering the areas of known historical disposal with currently dredged material deemed suitable for placement in the Sound (i.e., determined to not have a significant impact on human health or the environment).

Niel Michaelson, Cos Cob, CT – Email to NAE – October 4, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-974)	
COMMENT	I understand that Cos Cob Harbor and vicinity is scheduled for dredging. Believe me it is sorely needed as I have gone aground several times in the channel. This not only caused damage to my boat but was while I was aground it was hazard to other boats and navigation in general. It is especially dangerous at night as it's hard to tell exactly where you are in the channel and if you are off just a little, you may go aground. In addition, even if you are exactly in the center of the channel you still could go aground as the sand keeps shifting and filling as this area has not been dredged in many many years. Please keep on schedule with this dredging project.
RESPONSE	Maintenance dredging of the Mianus River FNP is currently in pre-construction planning by the USACE. This small project is unlikely to be funded through the USACE budget process. The USACE will complete it preparation of pre-construction NEPA documents and project plans and specification, but then must await project funding to proceed with contract solicitation and construction.
Valerie Kilbridge, Mattituck, NY – Email to NAE – October 3, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-986)	
COMMENT	I am writing to ask that the Army Corp of engineers and the EPA remove from the Dredged Material Management Plan (DMMP) the open water placement of dredged spoils into the Long Island Sound (the Sound)[.]
RESPONSE	Please see General Response to Availability of Open Water Alternatives (0041R).
COMMENT	[I am writing to ask that the Army Corp of engineers and the EPA remove from the Dredged Material Management Plan (DMMP)] the proposed use of 450 acres of Mattituck agricultural land to de-water 2,085,000 cubic yards of dredge spoil.
RESPONSE	The USACE used a systematic method to identify open spaces in the coastal zone of LIS. The land owners of the parcels identified were contacted and interviewed regarding their willingness to use the land for dredged material dewatering. The agricultural fields located on Oregon Road in Mattituck, NY (site NY-1) were identified as "potentially feasible in the future". Multiple (16) private land owners, as well as James McMahon of Southold Department of Public Works, were interviewed regarding these fields. The interview indicated that most of the site is currently in agricultural use (corn, field crops, vineyard, nursery stock, sod); 7 of the 16 parcels have Transferred Development Rights (TDR) to the Town of Southold; per Chapter 70 of the Town Code TDR restricts future uses of the site to agriculture only. Dewatering areas could potentially be constructed on the remaining parcels. It may be possible for the town to approve zoning changes if they desire upland placement opportunities. However, some local officials have requested that this site be removed from consideration for such use. Section 3.8.1 of the PEIS has been updated to indicate that "[d]uring the public review process, local officials requested that this site be removed from further consideration as the Town would not support that use".
COMMENT	Many steps have been and continue to be taken to improve the water quality of the Sound. While there have been positive results from this effort, like the recent sighting of dolphins frolicking, the task of reversing the damage caused by years reckless environmental disregard of this great body of water is far from over. Open water dumping is simply not an acceptable environmental alternative.
RESPONSE	Please see General Response to Open-Water Placement (0004R).

COMMENT	The use of agricultural acreage for de-watering dredge spoils is not an acceptable environmental alternative. Mattituck is an agricultural community, with active farms and vineyards. Using farmland to de-water dredge spoils would result in salt being absorbed into the fields, rendering the land unfit for farming.
RESPONSE	Please see above the response to the second comment made by this email.
COMMENT	It concerns me that the US Army Corps and their consultants have not met with local governments in over seven years. Before any local options are put into a public document, it is imperative that they consult and work with the town, hamlet, area residents and local businesses so that the impact to the community and local economy is fully understood.
RESPONSE	See General Response to Agency and Stakeholder Coordination (0074R).
COMMENT	I want to add that the failure to include in the DMMP an outline for logistical requirements such as barging and trucking, and the failure to evaluate impacts to groundwater, prime agricultural soils, and traffic is poor project management.
RESPONSE	These types of costs and impacts are project specific and could only be evaluated with respect to specific projects as they are proposed and investigated in the future. The DMMP includes typical costs for such activities in the cost matrix used to develop representative placement costs for various placement options but cannot examine specific sites without a particular project.
COMMENT	As expressed above, open water placement of dredged spoils and the use of prime agricultural acreage to de-water dredged spoils are not environmentally acceptable alternatives. I respectfully ask that the DMMP consider other alternatives.
RESPONSE	Please see General Response to Open-Water Placement 0004R).
COMMENT	One such alternative would be to transport the dredge spoils to fill the defunct coal mines of Pennsylvania. Some of these mines are threatened with the possibility of collapse. Another Pennsylvania mine is burning to this day. Placing the dredged spoil in these mine shafts would alleviate current environmental issues without compounding existing or creating new environmental problems.
RESPONSE	Please see General Response to Mine Reclamation Alternative (0072R).
John Meeks. Wilton, CT – Letter to NAE – October 2, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1016)	
COMMENT	the USACE(Army Corps of Engineers) have reneged on their agreement to come up with a plan to revise their disposal methods for materials dredged from harbors in Long Island Sound. What I am reading from the CCE info sheet seems to be that USACE have not been able to figure out what to do with this contaminated material other than to specify what areas within the sound where the material will be re-dumped. This would seem to be zero progress since 2005 toward cleaning up the sound, as far as the dredging process goes.
RESPONSE	Please see General Response to Open-Water Placement (0004R).

COMMENT	<p>Now of course the main reason cited for not trying to improve the situation is money. The governments, whether state or federal, claim poverty, and one of the causes for that is subsidizing medical care whether it be Medicare, Medicaid or Obamacare. The medical providers and insurers seem to have sufficient funds, partly due to the above public subsidies. Their business is brisk, indeed. Part of the reason for their burgeoning workload is the contamination of the environment by poisons found in the harbors of the sound. Wouldn't it be cheaper in the long run to pay to reduce the cause of this poisoning?</p> <p>This situation brings to mind another situation in the upper Hudson River, where GE Corp dumped a lot of PCB (estimated at 1.3 million pounds) before it was realized that the chemical was toxic, and wouldn't just disappear down the river or biodegrade. It took quite a few years since the EPA was started until GE was brought to admit their culpability in the matter and agreed to a plan to remediate. In 1977 GE stopped the dumping. In 1984 a 200 mile stretch of the Hudson was designated as a Superfund site. Dredge areas were identified by a multi-year program by GE; started in 2002, which involved more than 50,000 sediment samples. In November 2006 a legal agreement was reached. In 2009 the remediation began with dredging by clamshell bucket and later separation of stones, sediment and water. There were two phases, and the second phase started in 2011 after examining the data and refining the process. The first phase involved removal of 283,000 cubic yards of material and phase two involved 2.4 million cubic yards, which approaches the ballpark of tens of millions of tons planned to be relocated by the USACE in the sound. The 2nd phase will be done by the end of this year.</p> <p>My suggestion would be for the EPA to be involved in this matter, and that the respective health hazards of various contaminants assessed by them. This would be followed by a search for the originators of the contaminants and legal action would be taken against them or their successor organizations. Not as cut and dried as the case against GE in the Hudson or the BP in the Gulf, but it can and should be done, as the USACE apparently has a tight budget and probably disclaim responsibility as I am sure they see their role as only transporting the contaminated sediments. I guess what I am describing here is a DMMP (dredged material management plan) which the USACE was asked by CT and NY to come up with back in 2005.</p> <p>This may be beyond USACE technical and financial resources. They should call GE. They might even be providing some of the funds, as there were a limited number of sources for the PCB. We should not be looking for the 100 % solution here, as it would involve an almost limitless cost. Start with the legal, with GE on the Hudson as the precedent, and move on to the sampling so we can identify what needs to be remediated from that which does not, with a goal to reducing the hazardous levels by perhaps 85 to 90 per cent.</p>
RESPONSE	<p>The States of New York and Connecticut and the Federal government have regulatory authority over dredging and placement of dredged material. In order to be considered for placement of dredged material into a marine environment, the dredged material must undergo rigorous testing that indicates that the dredged material is suitable for placement at an marine site. There is no regulatory prohibition of placement of dredged material in a marine environment but rather the requirement to seek and receive approval from the appropriate regulatory agencies for that placement. All of the regulatory agencies that oversee Long Island Sound have procedures in place that would allow for the placement of dredged material in a marine environment.</p>

Mark Homberg, West Haven, CT – Letter to NAE – October 2, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-998)	
COMMENT	I oppose any contaminated material currently in Bridgeport Harbor being moved to the New Haven Harbor, Morris Cove Borrow Pit any time in the future.
RESPONSE	Please see General Response to Morris Cove Alternative (0148R).
COMMENT	This environmental waste [from Bridgeport Harbor] from the last 100 years, according to the Army Corps' 1998 Draft Environmental Assessment, contains arsenic, cadmium, chromium, copper, lead, mercury, nickel, zinc, poly nuclear aromatic hydrocarbons (PAHs), and polychlorinated biphenyl (PCB) congeners. Unsuitable for open water disposal. This dredge material will be hazardous for swimming, fishing, spawning winter flounder, impacts to leased shellfish beds, shell fishing, and may contaminate the as heavy metals settle into the ground.
RESPONSE	Please see General Response to Morris Cove Alternative (0148R).
COMMENT	There should be no added toxic carcinogenic sludge in Morris Cove, a part of New Haven's outer harbor area. The cove's shoreline has parks (with fishing and swimming), historic sites, and residential buildings. In the 1950s, about 1 million cubic yards of fill was removed from Morris Cove to construct Interstate 95, creating a "borrow pit" on the harbor floor. The pit is about 650 feet wide, 2,450 feet long, and 30 feet deep. The cost to contain this waste in Bridgeport is (\$49.7M), which is \$7.6M more than dumping in New Haven (\$42.1M) which is why this is a problem for New Haven Shoreline.
RESPONSE	Please see General Response to Morris Cove Alternative (0148R).
COMMENT	<p>I propose the following options for Morris Cove be explored further.</p> <p>Option 1-Southeast CAD Cell. Is located just north of the east breakwater, bounded by the 35 foot entrance channel and has the capacity to store a majority of the unsuitable dredged material. In addition, no shellfish beds would be disturbed during construction. This SE CAD cell was retained as a proposed disposal alternative for unsuitable material, although the West CAD Cell (18 acres) is carried forward as an option in case the Morris Cove borrow pit is not supported as a disposal alternative (Pg.13).</p> <p>Option 2-Investigation (pg.9) identified two areas as potential Confined Disposal Facility (CDF) locations in Bridgeport, the Powerhouse Creek canal and the upstream portion of Yellow Mill Creek.</p> <p>Option 3-There are two specific technologies that seem promising to treat the dredged material that will allow it to be used in a beneficial manner. One process involves thermal treatment of dredged material where the resulting end product can be mixed with Portland cement. This "blended cement" can be used in construction. (pg.15)</p> <p>Option 4-Another process washes the material under pressure and adds surfactants to clean the material. The end result of this process is a soil that can be mixed or amended with other material that can be used in landscaping (pg.15)</p>
RESPONSE	Please see General Response to Morris Cove Alternative (0148R).
COMMENT	We object to ANY material being moved out of Bridgeport Harbor unless it is removed from Long Island Sound, The money saved and potential damage relative to Federal Resources is not an acceptable reason to poison this environment.
RESPONSE	Thank you. Your comment has been noted.

Boats Incorporated, Niantic, CT – Letter to NAE – October 2, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1003)	
COMMENT	As the owner of Boats Incorporated and its 31 employees along with our 186 slip occupants, I am writing to urge the US Army Corps of Engineers to adopt the draft Dredged Materials Plan (DMMP).
RESPONSE	Thank-yoou for your support of the DMMP. Please also see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	[Y]ou are and have been the ones most qualified to make this decision, and it is a good one. You were entrusted to develop a plan and you did. Too much time and money has been spent on the research to date to be shot down by a few. We (Marina Operators) in Connecticut are also bound by zoning and are required to be Marine Related (CAM Act) for access to our waters. If we don't have access, we have nothing. Literally nothing, as we can't sell as commercial property. How ironic, we are required to provide access but possibly can't if we can't dredge and maintain access.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
Sailer Environmental, Madison, CT – Letter to NAE – October 2, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1004)	
COMMENT	I am writing to urge the US Anny Corps of Engineers (USACE) to adopt the draft Dredged Materials Management Plan (DMMP) and the draft Programmatic Environmental Impact Statement (PEIS) for Long Island Sound which were released for public comment in August 2015.
RESPONSE	Thank-you for your support of the DMMP. Please also see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	I am also well aware of the environmental, logistic and economic realities of upland disposal, having been involved in several upland dredged material sites both as a regulator (New Jersey Department of Environmental Protection 1979 -1985) and as an environmental consultant. Placing fine grained dredged materials upland poses an environmental risk to groundwater which severely limits locations where it may be environmentally acceptable. Presently, there is no upland disposal capacity available within an economically viable distance. There are also no large scale dewatering sites available to make the dredge material safe for over the road transportation. Even if such sites were available, dewatering and transporting those materials to large scale brownfields projects in New Jersey, or mine reclamation projects in Pennsylvania is not logistically or economically viable.
RESPONSE	Please see General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R), General Response to Consideration of Mine Reclamation Alternatives (0072R), and General Response to Upland Placement Alternatives for Dredged Material (0085R). The DMMP provides a relative comparison of the costs of these various alternatives.

Robert Todd, Hamden, CT – Letter to NAE – October 1, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1035)	
COMMENT	The figures quoted in her literature were that 30-50 million cubic yards of dredge material is to be dumped into the Sound over the next 30 years. That sounds dramatic, but the total figure represents only about 0.04% of the volume of the Sound, spread out over 30 years, or about 0.0013% every year.
RESPONSE	The 53 million CY figure over the 30-year planning horizon for the DMMP is the total volume that could be dredged from all projects in the region if every project requiring dredging were to be funded and constructed. This was intended to be an upper limit. It is unknown whether any individual project would actually be funded and pursued in that timeframe, or whether Congress would actually authorize and appropriate funds for any of the larger improvement projects included in the projections. The dredging of all 53 million CY is unlikely to occur. But we believe we have identified all projects that may be dredged in that timeframe, except perhaps for smaller-scale improvement projects that have not yet been requested for study.
COMMENT	Presumably, this material is to be dredged from the Sound in the first place. Again presumably, the material will be dredged from harbors and rivers bordering the Sound. Such material is likely to be more heavily polluted with all sorts of harbor detritus than if it were dredged from the middle of the Sound.
RESPONSE	Please see General Response to Sediment Contamination (0005R).
COMMENT	If these assumptions are correct, it seems to follow that harbor pollution will be slowly spread throughout the Sound, since three of the four proposed dredging sites (New London, Cornwall Shoals, and Western LIS) are located at narrow points in the Sound where the tidal currents are strong. Strong currents may speed the spread of pollution, but I'm sure that that's been considered, as has the natural cleansing action of storms and strong tides from the Atlantic.
RESPONSE	With the nearly 40 year record of DAMOS surveys, there have been multiple opportunities
COMMENT	Further, I'm totally ignorant of what the effect of heavy metals, indissoluble chemicals, shredded oil-based plastic, diesel fuel, tars, lubricants, and the like will be on marine life, and what concentrations of these effluents are tolerable, so I can't yet complain about those effects, but the stuff sounds as though it's seriously nasty stuff. And, perhaps, they're so bad for so many life forms, that even tiny concentrations would be too high.
RESPONSE	Please see General Response to Sediment Contamination (0005R).
COMMENT	I'd very much appreciate it if you, or someone on your staff, could assure me that the DMMP will not endanger marine life or my grandchildren's enjoyment of a clean and healthy Long Island Sound and that I can pass along to those little grandkids my admiration for the "Army Engineers."
RESPONSE	Please see General Response for Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
Cheryl & Deborah Robin-Amendola, New Haven, CT – Letter to NAE – Oct 1, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1039)	
COMMENT	Please be advised that as concerned citizens we are in favor of having an interdisciplinary committee formed that makes decisions based on unbiased well researched, scientific evidence on how to dispose of questionably and/or known contaminated materials in or around this state.

RESPONSE	The DMMP recommends a continuation of the Regional Dredging Team post-DMMP. One of the RDT's tasks is to champion the implementation and funding of beneficial uses and other alternatives to open-water placement in the future. Interstate and Federal-state partnerships will be key to implementing non-open-water alternatives. The RDT will also continue to review individual dredging projects as they come forward for approvals to ensure that each has adequately investigated all practicable alternatives. The DMMP also recommends that the RDT continue to use the technical working group established during the DMMP to assist in developing and analyzing practicable alternatives.
COMMENT	I further suggest that the best, but not always most cost effective method to dispose of the material be utilized to dispose of said material. There are methods of reusing these materials, detoxifying them utilizing bio-remediation, and other more wise and potentially more useful things that can be done with contaminated manmade materials.
RESPONSE	The DMMP identifies and screens all practicable alternatives, including beneficial use and innovative technologies, but does not select a specific alternative for implementation at this time. The Project Development Team for the DMMP, which developed the inventory of placement alternative types, included Federal and state agencies from the three states. The screening evaluated 149 alternatives, including several beneficial use categories, which resulted in over 14,000 project-alternative site pairings.
COMMENT	<p>We all have to live here. We cannot create a cesspool out of our living space and we certainly cannot leave a toilet to our children and grandchildren. Improper disposal of our used material will affect the entire eco-chain. Many people depend on Long Island Sound for livelihoods, recreation, transportation, commerce, etc. To destroy or render it uninhabitable for marine life, safe use by people for boating, swimming, fishing, etc. would be criminal.</p> <p>As citizens, we recycle as much as we possibly can, own hybrid cars, compost, have a garden, preserve our produce and vote. We practice what we preach. We expect our governing bodies to do the same to preserve this planet.</p> <p>With these facts and statements in mind, we are requesting that no dredged materials be dumped into Long Island Sound from any source, and certainly not moved from one contaminated site to contaminate another.</p>
RESPONSE	Please see General Response to Open-Water Placement (0004R).
<p align="center">Leonard Rosati - Letter to NAE - September 29, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1132)</p>	
COMMENT	The above household is against any form of pollution or dumping of any type in Long Island Sound.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	I have also witnessed construction debris (mainly Styrofoam shavings, which is used for synthic stucco exterior systems, being washed down storm drains which enters our rivers and ending up in the Sound. These very large "projects" need to be more closely monitored.

RESPONSE	<p>The USACE regulatory authority extends to activities placing fill or structures in the wetlands or waterways of the United States. Regulation of construction activities in upland areas is not a Federal matter.</p> <p>Before any dredged material can be placed at an open-water site, rigorous physical, chemical, and biological testing must be performed. This testing ensures that the placement of dredged material in the sound will not have an environmental impact on the sound's ecology. These test results must be reviewed for each project independently by US EPA and the state regulatory agencies before placement can be approved. Dredged material which fails these test may not be placed in the open waters of the sound and must be confined by some other method. Silty material - a very common product of dredging, particularly unsuitable material - may be used for marsh creation, but has limited beneficial use options because it usually is not compatible with beach nourishment, is not an appropriate construction material, including as an additive to concrete, and has a salt content too high for landscaping.</p>
<p align="center">Niantic Bay Yacht Club - Letter to NAE - September 28, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1163)</p>	
COMMENT	I'm writing in support of your DMMP study. We are a small sailing club in Niantic Bay, on Long Island Sound operating primarily as recreational sailing organization with a breakwater and seasonal floating dock system for 60 boats, and a crane dock.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	We [Niantic Bay Yacht Club] have had an ongoing dredging plan since the mid 1980's to keep our basin useable. Towards this end, we have been working CT DEEP and the US Army Corps of Engineers to stay current with permits. We conduct a small scale maintenance dredging every other year with the spoils going to beach replenishment for adjacent beach associations. On about a ten year interval, we must do a basin wide dredging to restore the overall depth of operations. This dredging has always used open water disposal of the spoils in designated Long Island Sound disposal areas, the New London disposal site. The cost of our current dredging program has been steadily rising and there has been an increased reluctance from the adjacent beach associations to receive displaced sand. If forced to use an alternative disposal site at a greater distance, the costs would rapidly become prohibitive. The inability to dredge would rapidly bring our ability to function as a Yacht Club to a close.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	We strongly support the continued use of the New London disposal site or another site at similar distance.
RESPONSE	Please see General Response to Open-Water Placement (0004R).

Gulf Oil Limited Partnership - Letter to NAE - September 28, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1132)	
COMMENT	Gulf Oil Limited Partnership is in full support of the Dredged Material Management Plan. The current disposal site's offers a safe and economical solution to the stakeholders that perform maintenance dredging at their individual facilities as well as decreased cost to the Army Corp when channel dredging is performed. These sites have been used and monitored for many years and have continuously presented themselves to be effective and environmentally sound. Any alternative plan would place extreme financial burdens on these same businesses' placing some in jeopardy of continued receipt of deeper draft vessels.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	We firmly believe that any alternative plan would most certainly affect Connecticut's three ports economically, especially the New Haven Harbor, due to the potential decrease of commerce and/or increased operating costs to the stakeholders.
RESPONSE	Please see General Response to Dredging Economy (0006R).
Unit Owners Association at the Guilford Yacht Club - Letter to NAE September 28, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1160)	
COMMENT	On behalf of the Unit Owners Association at the Guilford Yacht Club (UOAGYC), I am providing comment on the Draft Dredged Material Management Plan (DMMP). The UOAGYC strongly supports the DMMP and the continued maintenance of the off-shore disposal option for dredged materials. The Unit Owners Association at the Guilford Yacht Club is a privately owned yacht club facility located at 379 New Whitfield Street, Guilford, CT 06437. The UOAGYC serves as a recreational facility for our members and their guests including a marina basin with 153 boat slips, tennis courts, swimming pool, as well as a clubhouse that is used for both club and private events. In addition to our members, boaters from throughout Long Island Sound and neighboring states routinely visit our facility when transiting the area.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	The Unit Owners Association at the Guilford Yacht Club has been privately maintaining the West River channel and marina basin for over 18 years to ensure consistent safe navigability. Each year the UOAGYC incurs significant costs, budgeting \$320,000, to dredge the channel and basin. Historically we have used off-shore disposal sites for material management. The dredging program typically includes the removal of about 5,000 to 7,500 cubic yards per year to maintain a navigable channel at mean low water (MLW). The UOAGYC strives to maintain the channel with a depth of 6 feet and a working width of 60 feet. In addition, we remove between 4,000-6,000 cubic yards from the marina basin each year. As part of the annual dredging program, UOAGYC is required to maintain permits for both the channel and marina basin. For at least the past eight years, our dredge materials have been characterized as "clean." Our dredged materials are typically used as cover for more contaminated spoils, as directed by the Army Corp of Engineers. We have worked closely with the Army Corp of Engineers and the Connecticut Department of Energy and Environmental Protection (CT DEEP) each year as we develop our dredging plan and schedule.

RESPONSE	Covering of suitable dredged materials by chemically cleaner suitable materials is a requirement of the CT DEEP under their Clean Water Act authorities.
COMMENT	After consideration of various options, during the 2014/2015 dredging season, the UOAGYC attempted to switch to hydraulic dredging rather than the conventional mechanical dredging that has been used in the past. To facilitate the hydraulic dredging of the channel and basin, the UOAGYC selected and engaged Groh Dredging & Marine, LLC ("Groh") to undertake this work. This involved dredging of the spoils from the basin into large filter bags located at an upland bermed area on our property. The intent of the upland spoils management was to reduce the volume of material disposed at offshore dumping grounds and ultimately repurpose the spoils as topsoil in an environmentally friendly manner. Unfortunately, unanticipated complications were experienced in connection with the drainage of the filter bags, which occurred at a much slower rate than anticipated. We were forced to cease the basin dredging project before completing the required dredging. Faced with the expiration of the dredging permit, the UOAGYC had to engage Patriot Marine, LLC ("Patriot") on short notice to complete the project using conventional dredging and off-shore disposal.
RESPONSE	Please see General Response to Upland Placement Alternatives for Dredged Material (0085R)
COMMENT	The upland management of dredge spoils has faced another complication. Our permit from the State of Connecticut does not allow for the off-site disposal of spoils for fill material or other purposes. We have collected samples of the materials to demonstrate there is no contamination, however the State has yet to provide guidance related to the material salinity. If we are not permitted to seek off-site options for our spoils, we have only one or two years of space remaining in our spoils management area.
RESPONSE	Please see General Response to Upland Placement Alternatives for Dredged Material (0085R)
COMMENT	We [UOAGYC] are committed to seeking alternative beneficial uses for our spoils, however as a small private facility, we face significant challenges to identify new options. We continue to look for innovative alternatives, however, until there are scalable projects, we will continue to rely on offshore material disposal for the foreseeable future. We did embark on the initial review of a marsh restoration project, between the East and West Rivers in Guilford in 2014, however the initiative stalled when funding requirements were explored.
RESPONSE	Please see General Response to Cost of Beneficial Use Alternatives (0076R)
COMMENT	The UOAGYC remains committed to finding the best solution on an ongoing basis and continues to evaluate the best and most environmentally friendly course of action. Until new solutions are found, we will continue to rely, at least in part, on offshore disposal for our dredged materials. Our membership is represented by residents of Connecticut, and New York.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)

Magellan Midstream Partners, L.P. - Letter to NAE September 25, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1226)	
COMMENT	Magellan Midstream Partners owns and operates three petroleum storage and distribution facilities in New Haven Harbor. The majority of the heating oil consumed in the state of Connecticut is loaded into transport trucks at our facilities. Therefore, we are directly affected by the operational status of the Harbor. I am writing to express Magellan's support for the Dredged Material Management Plan (DMMP) recently released by USACE. The evidence that has been presented has identified the most fiscally and environmentally suitable means for managing dredged materials for the future.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	The economic vitality of our port sustains numerous businesses including critically significant energy infrastructure facilities like those owned and operated by Magellan.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
COMMENT	Lastly, if deliveries of petroleum products via marine vessel are disrupted, unsuspecting consumers would be impacted with potential product shortages and even outages.
RESPONSE	Thank you. Your comment has been noted.
COMMENT	The environmental component has been well researched and documented. The continued monitoring of open-water disposal sites along with the detailed permitting process that precedes disposal operations has been designed such to ensure that water quality and that of the overall marine environment remains unharmed.
RESPONSE	Please see General Response to Environmental Degradation/Consequences and Economic Cost of Open-Water Placement (0002R)
COMMENT	If dredging operations are interrupted and the navigable waters of our State and region impacted the threat of groundings increases substantially. The results could endanger human lives and our environment.
RESPONSE	Please see General Response to Navigational Safety (0077R)
COMMENT	Connecticut clearly has the greatest dredge needs. These needs must be met with sound economic and environmental solutions that I believe have been achieved in this plan.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Nancy & Donald Simmonds, Shelton, CT – Letter to NAE September 24, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1266)	
COMMENT	We are writing in opposition to the proposed plan by the USAGE to continue open water dumping of dredged materials into Long Island Sound. Long Island Sound is an Estuary of National Significance and home to more than 120 species of fin fish and countless varieties of birds and other animals. It is incomprehensible to us that our own Army Corps of Engineers has not acted on the 2005 agreement between CT and NY to phase out open water dumping in the sound made a decade ago.
RESPONSE	Please see General Response to Open-Water Placement (0004R).

COMMENT	We support the development of a plan that phases out open water dumping of dredged materials and reuses these materials in a safe and beneficial way. A healthy Long Island Sound is important to all of us. Please look into the beneficial reuse options such as beach nourishment, constructing wetlands, capping landfills and brownfield sites[.]
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	[Please look into the beneficial use options such as] filling in of abandoned mines in the State of Pennsylvania.
RESPONSE	The mine reclamation alternative in Hazelton, Pennsylvania was not dismissed because it is located outside of the study area. It was dismissed because the costs for using this alternative site were calculated and it was significantly more expensive than other alternatives analyzed. Please see General Response on Mine Reclamation (0072R).
COMMENT	Please endeavor to make the necessary modifications to abolish open water dumping a reality now.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
Masons Island Marina, Mystic, CT - Letter to NAE September 23, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1308)	
COMMENT	I am writing to you to ask that you consider legislation to open up an additional Eastern Long Island Sound disposal site for dredging materials.
RESPONSE	The Corps of Engineers, as part of the DMMP, evaluated management options that could currently be available or could be developed under our authorities. There is a process for designation of open-water sites. Under MPRSA, EPA is the agency that has the authority for designation of open-water placement sites.
COMMENT	I am an owner of a small family owned marina business. We face often insurmountable obstacles in the interest of staying in a business. We are located very close to the RI border where the price of gasoline is often thirty cents a gallon cheaper for boaters in that state. The dockage fees are much less expensive do to the lack of sales tax on slips in RI as opposed to sales tax on CT slips. CT also requires a certificate of decal for out of state boaters to dock here in CT and if you actually choose to change your out of state registration to a CT registration, you are required to pay CT sales tax as though you are purchasing the boat all over again. However, in spite of all of these obstacles, we do have customers who dock/moor their boats at our facility eight miles west of the much less expensive RI marinas. So when we have maintenance costs that are beyond the normal wear and tear dock repairs, equipment repairs, or catastrophic ice or storm damage, we are almost driven to the point of no longer being able to stay in business. When we purchased the marina in 1986, the owners were at a point where the marina was no longer able to accommodate the draft of boats that they had once accommodated. Not only were the slips silted in, but the travel lift haul out area was silted in to a point of only being able to haul/launch at high tide. We were able to obtain a permit to dredge with our land based crane and dispose of the dredged materials upland after de-watering. We were able to open up some of the silted in slips and free up the haul out area to accommodate more boats during a greater window of time with less of a tide restriction. We have however never been able to adequately maintain the areas too far from the reach of a land based crane. Those areas need a barge/crane and the ability to dispose other than upland. The cost of that is prohibitive to us if the spoils have to be transported to New Haven. We have tested the bed of the area we need dredged and have tested very well with no major contamination. In fact, we have soil capable of being used for capping.

RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
COMMENT	We employ nine people, five of them are full time employees. They are dependent on the marinas ability to remain a viable business. We contributed just under \$25,000.00 to the State of Connecticut in Sales Tax in 2014 which largely came from dockage/mooring fees. We are asking that you advocate for us in this matter and appreciate your time and consideration on this issue [an additional Eastern Long Island Sound disposal site].
RESPONSE	The Corps of Engineers, as part of the DMMP, evaluated management options that could currently be available or could be developed under our authorities. There is a process for designation of open-water sites. Under MPRSA, EPA is the agency that has the authority for designation of open-water placement sites.
Riverside Yacht Club - Letter to NAE September 23, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1309)	
COMMENT	As a business whose lifeblood is navigational access, dredging is critical to ensure public access and commerce
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
COMMENT	This scientific plan clearly shows open-water disposal to be the most cost-effective and environmentally compatible method of placement without adversely affecting Long Island Sound for the majority of dredge material. We believe access to these placement sites must be preserved to provide economically viable dredge solutions. Connecticut, out of the three subject states, clearly has the greatest dredge need and I fully support the U.S. Army Corps of Engineer's recommendation for continued open-water placement in the four current locations as part of the overall plan.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
David Carr, North Haven, CT - Letter to NAE September 21, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1407)	
COMMENT	<p>Up to 1,108,200 cubic yards of contaminated material currently in Bridgeport Harbor is heading for the New Haven area shoreline if people do not pay attention. This environmental waste, according to the Army Corps' 1998 Draft Environmental Assessment, contains arsenic, cadmium, chromium, copper, lead, mercury, nickel, zinc, poly nuclear aromatic hydrocarbons (PAHs), and polychlorinated biphenyl (PCB) congeners. Unsuitable for open water disposal. This dredge material will not be good for swimming, fishing, spawning winter flounder, impacts to leased shellfish beds, shell fishing, and may contaminate the drinking water as heavy metals settle into the ground. Dredged material will be released from a barge through, the water to land on the bottom. I oppose the relocation of this material out of Bridgeport Harbor unless it is completely removed from Long Island Sound.</p> <p>A standard, tractor trailer size (40x12x8.5 feet) shipping container holds about 84 Cubic Yards, so we are talking about 13,192 containers of contaminated waste dumped around Morris Cove in New Haven, Long Island Sound, Connecticut.</p>

	<p>There should be no added toxic carcinogenic sludge in Morris Cove, a part of New Haven's outer harbor area. The cove's shoreline has parks, historic sites, and residential buildings. In the 1950s, about 1 million cubic yards of fill was removed from Morris Cove to construct Interstate 95, creating a "borrow pit" on the harbor floor. The pit is about 650 feet wide, 2,450 feet long, and 30 feet deep. The cost to contain this waste in Bridgeport is (\$49.7M), which is \$7.6M more than dumping in New Haven (\$42.1M) which is why this is a problem for New Haven Shoreline, right Now.</p> <p>SOURCE here : https://www.cga.ct.gov/2010/rpt/2010-R-0417.htm</p> <p>2010 Draft Environmental Assessment, Evaluation for Maintenance Dredging and Dredged Material Disposal Facility Construction states 1,199,000 unsuitable cubic yards of dredge material needs to be disposed of (pg 17).</p> <p>Options to Morris Cove</p> <p>Option 1 - Southeast CAD Cell. Is located just north of the east breakwater, bounded by the 35 foot entrance channel and has the capacity to store a majority of the unsuitable dredged material. In addition, no shellfish beds would be disturbed during construction. This SE CAD cell was retained as a proposed disposal alternative for unsuitable material, although the West CAD Cell (18 acres) is carried forward as an option in case the Morris Cove borrow pit is not supported as a disposal alternative (Pg.13).</p> <p>Option 2 - Investigation (pg.9) identified two areas as potential Confined Disposal Facility (CDF) locations in Bridgeport, the Powerhouse Creek canal and the upstream portion of Yellow Mill Creek.</p> <p>Option 3 - There are two specific technologies that seem promising to treat the dredged material that will allow it to be used in a beneficial manner. One process involves thermal treatment of dredged material where the resulting end product can be mixed with Portland cement. This "blended cement" can be used in construction. (pg.15)</p> <p>Option 4 - Another process washes the material under pressure and adds surfactants to clean the material. The end result of this process is a soil that can be mixed or amended with other material that can be used in landscaping (pg.15)</p> <p>Contaminated Material: Samples were collected in 1998 and analyzed for total organic carbon (TOC), metals (arsenic, cadmium, chromium, copper, lead, mercury, nickel, and zinc), poly nuclear aromatic hydrocarbons (PAHs), pesticides, and polychlorinated biphenyl (PCB) congeners. Subsamples of C, F, and K, and CLIS were also analyzed for dioxin/furans (pg.23). The results (pg.26) show PCBs, from double to triple the reference sample, up to over 100 times baseline (498 ug/kg) in first 39 inches of sample. The test sample from the entrance channel "NQ", determined unusual variability among the five replicates warranted additional testing of that specific sample (pg.27).</p> <p>SOURCE here: http://www.nae.usace.army.mil/Portals/74/docs/Topics/BridgeportDMMP/DraftEA-FONSI?404.pdf</p>
RESPONSE	<p>In response to the many comments received from the public and agencies on the use of the Morris Cove Borrow Pit as a CAD cell, the section of the DMMP in Chapter 4 (Section 4.9.8) describing Morris Cove and its potential use has been expanded to include additional information on CAD cell technology and on the Morris Cove site in particular.</p>

David Friedman, Saint James, NY – Letter to NAE – September 18, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1460)	
COMMENT	I protest strongly against the Long Island Sound dredged material management plan (DMMP) submitted last month. It is nothing more than a preservation of the status quo, namely using Long Island Sound as a dumping ground for toxic and hazardous materials. Nobody disputes the need for dredging waterways emptying out into Long Island Sound. However, dredging must be done in a manner that does not imperil the Long Island Sound ecosystem, as well as the livelihood of fisherman and lobstermen and the health of the general public.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	The submitted DMMP plan fails to recognize the damaging environmental and economic impacts continued open water dumping will have. In particular it fails to evaluate the negative impact of additional nitrogen pollution, based on the well-established fact that open water dredging leads to significant addition nitrogen loading, which in turn leads to algae blooms and dead fish, mussels, and lobsters.
RESPONSE	Please see General Response to Nitrogen Loading (0153R).
COMMENT	It [the draft DMMP] also fails to adequately address and deal with the toxic contaminants contained in the dredge spoil, including, but not limited to PCBs, lead, mercury, pesticides, and heavy metals.
RESPONSE	Please see General Response to Sediment Contamination (0005R).
COMMENT	There are viable alternatives to open-water disposal of dredged material such as capping landfills or abandoned mines, beach reconstruction, and upland disposal. It is ridiculous to add to the two disposal sites already present two more when the two we have already show so many problems.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	WLIS was once a prime lobster producing area but populations have declined significantly over the last decade. CLIS has high levels of toxins and decreased oxygen (hypoxia) which causes the death of marine creatures such as fish and crustaceans.
RESPONSE	Please see General Responses to Sediment Contamination (0005R) and to Hypoxia (0031R).
COMMENT	Long Island Sound is not a toilet. As a resident on Long Island's north shore the health of the Sound is very important to me, both in terms of health and recreational activities. Please respond to me in writing as to how you plan on addressing my concerns.
RESPONSE	Please see General Response to Open-Water Placement (0004R).

Saybrook Point Inn and Marina, CT - Letter to NAE September 17, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1524)	
COMMENT	<p>My family and I have owned Saybrook Point Marina for over 35 years. I am writing on behalf of my family to tell you that our future survival as a business in Old Saybrook, CT is in jeopardy. We currently dredge every 2-3 years to keep our facility operating, and if we are not allowed to dredge due to constraints in removal and disposal of material, we would be forced to shut down, putting nearly a dozen employees out work, and not to mention shuttering a local economy and devastating a local community. We are one of many marinas in Old Saybrook and one of hundreds along the Connecticut shoreline affected by the Dredge Material Management Plan. We not only provide goods and services to our boating community, but we also support many regional, national, and international tourists who flock to our shores annually. We provide significant tax revenue to the local community-whether it's through our employees or boaters who shop, dine and entertain in local businesses or whether it is our boat owners who pay property taxes to the town. The marine trade industry, as well as the boating community is a driving force in the local area economies for which they are located. Dredging is the lifeblood of our business, and without the proper management plan for removal and disposal of material, we, along with the hundreds of other marinas in Connecticut, would be forced to shut down. More than 35 years ago, my mother and father built the Saybrook Point Marina into what is today, which I'm proud to say is Connecticut's first designated Clean Marina since 2003.</p>
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	<p>Located at the mouth of the Connecticut River, Saybrook Point Marina provides convenient access to Long Island Sound, offering world-class amenities and providing high quality service to yachts of all sizes. On site, guests will find friendly concierge service, award winning cuisine, AAA Four Diamond Hotel, an indulgent spa, and state-of-the-art health club. The Saybrook Point Marina can accommodate vessels from 13-200 feet with the goal of enhancing the boating experience. Its commitment to customer service is matched by its commitment to environmental action. My mother and father actually lived at the marina while they were developing the Saybrook Point Inn & Spa, which is among the town's top employers of the community's top economic engines. As one of the regions premier resort destinations, we also employ more than 260 hospitality professionals and have received numerous awards for our best in class green practices, including the first Connecticut inn to be named a certified energy hotel in 2007. As owners of the Saybrook Point Inn & Spa, the loss of the marina would mean significant reductions in employment at the main inn and spa as \$1.5 million in revenue would be washed away with its closure. As you know, Connecticut, out of the three subjects states in DMMP, has the greatest dredge need. Our state must take the lead in insuring navigational access for future. Access is achieved by maintaining and improving the navigational waters of the LIS region through dredging including those maintained federally and those funded by the state and private proponents.</p>
RESPONSE	Please see General Response to Dredging Economy (0006R).

COMMENT	By Regulations, the Federal Government is tasked with finding both the most economical and environmentally sound method for maintaining navigational access and sound business practice requires the same for private projects. This plan has determined that open-water placement of dredge material in Long Island Sound meets that standard for over three-quarters of the anticipated material. The research has shown that most of today's material is found suitable for open-water placement following extensive physical, chemical, and biological testing, and other alternatives for varying degrees of dredge material have been determined and are include in The Plan. The existing open water placement locations, Western, Central, Cornfield Shoals, and New London have all proven to provide the most economically viable placement locations for the projects from their geographic regions without adversely affecting Long Island sound. These placement sites should be designated to remain open by the EPA as a result of the extensive research complete in this plan. The Connecticut department of energy and environmental protection has publically stated their support for the DMMP. The DMMP has taken ten years to complete at a cost estimated at 15 million.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	No action on this plan will result in skyrocketing dredging costs, the closure of the LIS open water placement locations within a year's time, fewer maintained ports and harbors, significant in access all of which will substantially impair the regional economy. The time to act is now, and we ask that you make the right decision and enable us to continue to operate in our local economy. The Programmatic Environmental impact statement supports the direction of open water disposal after considerable testing. Cost affective and reasonable disposal options must be maintained. No action is not an alternative-our facility, much like others in Connecticut, w ill be significantly impacted in one years' time if no action is taken. And from there, the local community will begin to feel its negative impact. I hope you will consider the serious detrimental effects this will cause.
RESPONSE	Please see General Response to Dredging Economy (0006R).
Angela Hamberger - Letter to NAE September 12, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-698)	
COMMENT	Please do not dump in Long Island Sound.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	Please find develop a plan that phases out open water dumping of dredged materials and reuses these materials in a safe and beneficial way.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	Cancer is rampant on Long Island and dumping in the Sound may be playing a part in that.
RESPONSE	There is no evidence to suggest that open water placement of dredged material has any direct or indirect impact on human health. Please see General Response to Sediment Contamination (0005R).
Cynthia Hurtt Wilbur, Farmington, CT - Letter to NAE September 10, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1738)	
COMMENT	I am writing to express my opposition to the draft Dredged Material Management Plan released earlier this month. It fails to honor a 2005 agreement to by Connecticut to phase out open water dumping in Long Island Sound and look for uses for the dredged materials.
RESPONSE	Please see General Response to Open-Water Placement (0004R).

COMMENT	Long Island Sound should not be considered open water. This marine ecosystem has a relatively narrow channel to the larger open ocean therefore; nitrogen and other toxins can build up to harmful levels.
RESPONSE	Under Federal law, LIS is regulated by the Federal government as ocean waters under MPRSA and by the states as open water under the Clean Water Act. See the PEIS Section 2.1.
COMMENT	Please find creative and beneficial uses for the dredged material.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	A healthy Long Island sound is important and this action would set back recent restoration efforts.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
Vicky Harris, Farmington, CT - Letter to NAE September 10, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1742)	
COMMENT	I am writing to oppose the plan to dump in the long island sound[.]
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	I urge you and others to seek alternate plans to phase out open water dumping of dredged materials and reuse this material in a safe and beneficial way.... I support the beneficial use of dredged material instead of open water dumping.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	We should all be concerned of the potential health risks and should all strive for a healthy Long Island Sound.
RESPONSE	There is no evidence to suggest that open water placement of dredged material has any direct or indirect impact on human health. Please see General Response to Sediment Contamination (0005R).
David Winston, Stamford, CT - Letter to NAE September 9, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1780)	
COMMENT	I am writing in support of the draft Dredged Material Management Plan. Dredging is vital to our economy and to ensure public access to our waterways. This scientific plan currently under public review after a decade of preparation clearly shows that open-water disposal is the most cost-effective and environmentally compatible method of placement without adversely affecting Long Island Sound for the majority of dredge material. There are four current disposal locations; access to these placement sites is critical.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	I believe you should consider the elimination of the disposal sites in Long Island Sound.
RESPONSE	Please see General Response to Open-Water Placement (0004R).

COMMENT	It is my opinion that the need for dredging in harbors and commercial waterways is of primary importance to the communities that the commercial activities are located in. Therefore one would think that those communities would practice up-shore development that minimized the need for dredging in their coastal areas. It is my opinion that coastal communities like Stamford are only interested in development for the sake of profit and larger tax bases. This development as most of us know creates larger impermeable areas and more accelerated runoff which is the primary cause of our waterways being scoured at outlet sites and siltation deposition at the harbor areas in Long Island Sound. I do not believe Long Island Sound should be the final resting place of this development debris. It should be returned to an upland site in the community from which it came or a suitable upland landfill. Long Island Sound should not be considered every developers dream deposit area.
RESPONSE	Although the 2005 letter from the Governors of New York and Connecticut requested a DMMP focused, among other matters, on the reduction of sediment and contaminant loading, the USACE responded to their letters stating that evaluating the reduction in sediment sources and contaminant loading are beyond the scope that can be funded as part of the USACE DMMP. Thus the states were given the option to provide non-Federal funding to perform these studies, or to perform these studies themselves. The states and EPA decided to work together to gather the necessary information and prepare a report on these issues. The information provided in this DMMP on sediment and contamination reduction is from the report provided by EPA and the states which is included in the appendix to the DMMP.
COMMENT	I understand the closing of the two remaining disposal sites will cause inconvenience however this should be chalked up to the price of progress for the community involved. Long Island Sound should no longer be considered the cheapest alternative. Maybe the disposal agreement going forward will include mandatory open space and larger storm water retention requirements for coastal communities. At the very least the cost of continued disposal in Long Island Sound should not be cheap. The burden of success should be placed on those communities to recognize their downstream contamination.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
Maureen Bright, Huntington, NY - Letter to NAE September 9, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1784)	
COMMENT	I have recently become aware that the federal government has put forward a proposal to dump 50 million cubic yards of dredged material from Connecticut into the Long Island Sound over the next 30 years.
RESPONSE	The DMMP went into greater detail in identifying the dredging needs for both the Federal government and non-Federal parties. The DMMP also identified those harbors with recurring dredging needs. In order to include all Federal navigation projects in the analysis, the DMMP examined a 30-year period instead of the 20-year period included in the preliminary assessment. This more in-depth examination of dredging needs resulted in the 50 million cubic yard total. Whether all or a portion of this will actually be dredged over the next 30 years will depend on many factors, including the availability of funding, demonstrating a navigational and economic need for each proposed project, and the costs of doing the work.

COMMENT	Our government has spent millions of taxpayer dollars in environmental restoration of the Long Island Sound. In Suffolk County the legislature and County Executive have taken steps to reduce nitrogen discharge from sewage treatment plants, implemented policies to reduce road runoff and new technology testing is taking place to reduce the nitrogen from our homes and businesses which finds its way into our water. The federal proposal undercuts these efforts to restore and protect our water quality and our quality of life.
RESPONSE	Please see the General Responses to Sediment Contamination (0005R) and Site Management and Monitoring Plans (SMMPs) (0302R).
COMMENT	I implore the Army Corps of Engineers and the Environmental Protection Agency to abandon their intent to continue dumping contaminated dredge spoils into the Sound and to work with Suffolk County officials to come up with a better plan for all Long Islanders. While we all deserve a better plan, future generations deserve more from us. We are capable of a better solution -we owe it to the children who ought to grow up with the same opportunities and experiences as previous generations.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
Barbara Reiss, Commack, NY - Letter to NAE September 9, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1776)	
COMMENT	While we appreciate the need to save [funds] we oppose open water dumping of dredged material in our Long Island Sound.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	We are already dealing a nitrogen pollution problem. Now we also face possible PCB contamination. We here in [unreadable] have already lost our fishing industry. We need to keep our waters clean & safe for ourselves and the whole country.
RESPONSE	Please see General Responses to Nitrogen Loading 0153R) and General Response to Sediment Contamination (0005R).
Bob Giordano, Huntington, NY - Letter to NAE September 4, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1815)	
COMMENT	As an Estuary of National Significance, I'm writing today to express my opposition for the plan to dump 50 million cubic yards of dredged material from CT into Long Island Sound.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	This plan over the course of thirty years will be a steady negative impact on our reefs, shell fishing, and fish populations in general and the fodder they feed on. In the last ten years, LIS has lost its Lobster population due to a slight increase in water temperatures combined with the spraying of pesticides to ward off West Nile Virus. How many man made impacts can the Sound take? Will this kill our hard shell clamming industry, the last source of income for baymen on LIS?
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	Please consider not approving this dump and take the material either to offshore waters out in the ocean or to a fill here on land.
RESPONSE	Please see General Response to Open-Water Placement (0004R).

Rex Marine Center - Letter to NAE August 30, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1833)	
COMMENT	The ability to once again use all 4 current open-water Dredge material sites is absolutely crucial to keeping the incredible resources of our Long Island Sound harbors safely navigable to historical channel depths, including our CT marinas & commercial wharfage.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	There is no financially viable dredge material disposal method available for the vast majority of us for whom Beneficial Use is not an option. No matter how clean the mud from Norwalk Harbor and my marina basin may be, upland is not even close to an affordable or even practical option for materials disposal. Who wants all that mud upland? Even requiring us to dump further than the 4 LIS sites imposes so much added cost as to effectively prevent most maintenance dredging from being able to be completed.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	Thank you for supporting the US Army Corps of Engineers plan that recommends the continuation of open-water disposal at all 4 current sites. Done correctly the environment is not harmed and the thousands of Connecticut jobs that rely on safe, 100% navigable harbors are preserved and hopefully even augmented.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
Thames River Properties LLC, New London, CT Connecticut Marine Trades Association - Letter to NAE August 27, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1841)	
COMMENT	I write to you today in support of the recently completed DMMP for Long Island Sound. I applaud your efforts for the past 15 years in bringing this study to its conclusions. We all in the Connecticut Marine Industry recognize the enormity of the project, and I can say as the Vice Chairman of CT Marine Trades Association, we all are in support of your findings.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	The economic impact of prohibiting any further dredged material disposal in LIS is mind boggling to say the least. As an example, one of my former marinas on the CT River had to dredge 5,000 yds of material several years ago. Under the present conditions, that would have cost us \$30 a yard for a total of \$150,000. If you had determined that all four relocation sites in LIS had to be closed, the cost to dredge the same amount would have been \$500,000. Simply an impossible burden for a 40-slip marina and an economic disaster for the Marine Industry as a whole.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	The position taken by the environmental community is that all dredged material is toxic and therefore injurious to Long Island Sound, and by extension therefore all of the four relocation sites HAVE to be closed down. This is simply not true, as we all know. All material to be dredged is tested extensively by the applicants and permits are based on the results of these tests. Any material that is even slightly toxic has to be capped. Material that is heavy with toxins (such as Bridgeport Harbor) has to be relocated in cad cells and then capped. To take the position that all dredged material is prohibited from LIS is unrealistic and destructive to an Industry that is vibrant and which provides access to the waterfront for the general public.
RESPONSE	Please see General Response to Sediment Contamination (0005R).

COMMENT	The support from CT DEEP, the State of CT Governor's Office, and local municipalities is an indication that the DMMP is looked favorably upon by not only the Marine Industry, but by Connecticut government. But the most significant supporter is certainly DEEP. Their support is overwhelming and you all need to listen to that support (as I think you will).
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	Finally, I'd like to point out that NO ACTION on this plan which identified "practical cost effective and environmentally placement alternatives" by EPA will result in skyrocketing dredging costs, closed placement locations, fewer maintained ports and harbors, significant reduction in access and will substantially impair the regional economy. I urge that action be taken on this study that cost American taxpayers in excess of \$15,000,000 and 15 years of your time and energy.
RESPONSE	Thank you for your support for the DMMP. Please also see General Response to Dredging Economy (0006R).
Bill Spicer, Spicer's Marina, Noank, CT - Statement to NAE August 27, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1843)	
COMMENT	I suggest that an easily recognizable eastern boundary of Long Island Sound start at Little Gull Island and proceed through Bartlett's Reef to the Connecticut mainland. <i>Block Island Sound, Gardiners Bay, The Race, Fishers Island Sound and New London Habror are not part of Long Island Sound.</i> I ask a prompt acknowledgement in writing that the Long Island Sound DMMP required by MPRSA Ocean Dumping Act rules will not encroach into the adjacent Clean Water Act 404 waters that are not part of Long Island Sound.
RESPONSE	Please see Public Involvement Appendix A, Part 3, for the EPA memorandum of May 12, 2009 on the "Eastern Boundary of Long Island Sound for Purposes of Section 106(f) of the MPRSA".
Petzold's Marine Center, Noank, CT - Letter to NAE August 26, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1852)	
COMMENT	I operate a boatyard on the Connecticut River and my business requires navigational access. Dredging is a critical activity to insure that the public has access to the waters and that my facility can remain open for business where it has been located for seventy years.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	Dredge material make-up takes on many forms. The scientific plan currently under public review after a decade of preparation clearly shows that open water disposal to be the most cost effective and environmentally compatible method of placement without adversely affecting Long island Sound for the majority of the dredge material. The DMMP clearly shows that of the nearly 55 federal projects, over three quarters of the material from those sites have been found to be suitable for open water disposal in the four current disposal locations. I believe that access to these placement sites must be preserved to provide an economically viable dredge solution. Connecticut clearly has the greatest dredge needs of the three states involved and must take the lead in insuring navigational access by supporting the U.S. Army Corp of Engineer's recommendation for continued open water disposal in the four current locations as part of the overall plan. To insure public access, the health of the maritime industry along with commercial activity these sites must remain
RESPONSE	Please see General Response to Open-Water Placement (0004R).

Brewer Yacht Yard at Mystic, CT - Letter to NAE August 26, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1853)	
COMMENT	I am writing in support of approval of the DMMP as proposed.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	As a manager of a marina in Mystic for 28 years, I have a full understanding of the need to protect the waters from which we make a living, but also the absolute need to dredge at a cost that is not prohibitive and undue. In the time I have been on the Mystic River, many dredge projects have been approved and carried out with the proper care and oversight of the Corps and the State of Connecticut. With the proper spoil management (ie: capping as deemed necessary at the open water disposal site off New London and others, upland disposal as is feasible, and beach replenishment as is feasible) I have watched as our industry survives and water quality in the sound has improved year after year. With the exception of the lobster population (whose decline I believe is due to climate change and the resulting higher water temperatures) we in our part of Long Island Sound have enjoyed a resurgence in the local marine populations, resulting in more interest from our citizens.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	Without dredging, many marinas eventually will no longer be viable as a business, and be re purposed.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	If any of these open water disposal sites are permanently closed, the cost of dredging will become out of the reach of most marinas.
RESPONSE	Please see General Response to Availability of Open Water Alternatives (0041R).
Crocker's Boat Yard, New London, CT - Letter to NAE August 26, 2015 (For Letter see Appendix A, Part 2A - Page A-2A-1854)	
COMMENT	I am writing to you today in support of your DMMP study. Having operated a family owned marina in the same location for 5 generations, since 1881, these 4 open-water placement sites need to be maintained and kept open. Connecticut, out of the three subject States in this study, has the greatest dredge need.
RESPONSE	Please see General Response to Open-Water Placement (0004R).
COMMENT	The existing open-water placement locations, Western, Central, Cornfield Shoals and New London have all proven to provide the most economically viable placement locations for the projects from their geographic regions without adversely affecting Long Island Sound. Too much time and money has been spent on this project to see it put on hold. No action on this Plan will result in skyrocketing dredging costs for all who must dredge, closure of the LIS open-water placement locations within a year's time, fewer maintained ports and harbors, and significant reduction in access, all of which will substantially impair the regional economy.
RESPONSE	Please see General Response to Dredging Economy (0006R).

Table A-3 - Responses to Public Hearing Testimony	
Village Center, Port Jefferson, NY - August 24, 2015	
Al Krupski, Suffolk County, NY, Legislature	
COMMENT	When you dump all that fine sediment, regardless of the levels of contamination, after centuries of industry in Connecticut indiscriminately dumping into their rivers and waterways to get rid of their waste, when you look at the level of the amount of fine material getting dumped into the Long Island Sound, and you consider the amount of energy that goes through the rain in the sloop sway in Plump Gut, that material is going to be instantly dispersed either in in-coming tide or out-going tide. It's certainly not going to remain in place, and it's going to coat the marine environment with everything that's been dumped there.
RESPONSE	The historic Orient placement site west of Plum Gut was evaluated as a formerly used site but is not proposed for future use by the DMMP. Please also see General Response to Sediment Contamination (0005R).
COMMENT	This just promotes -- this is what is really a lazy option, the least expensive option. You will never develop any adaptive reuse for the dredged material. There is nothing wrong with Connecticut trying to use their harbors in a way that they find most efficient, but they shouldn't be dumping the material in Long Island Sound, and if you open the curtains up behind you, you will certainly see why.
RESPONSE	Please see General Response to open water placement (0004R).
Steven Bellone, Suffolk County, NY, Executive's Office	
COMMENT	<p>Water quality is the top priority of this administration, and I feel like -- and in this region, I would say. And I feel like when it comes to the Long Island Sound we have a tale of two water bodies. One is a national treasure to protect and preserve, and the other is a convenient dumping ground. This disjointed policy extends to agencies like the EPA that are on the one hand pushing localities throughout Suffolk County to spend millions of dollars to upgrade sewage treatment plants in order to reduce discharge into the Sound. And on the other hand, would allow additional decades of the muck from the bottom of industrial harbors to be placed into that same water body.</p> <p>Such a policy fails the most basic tenets of common sense and public policy. Here in Suffolk County policymakers and the public have come together at all levels and I am proud to be with a number of my colleagues in government, all who are committed to protecting the Long Island Sound and water quality throughout Suffolk County. We spent millions of dollars to restore the Sound to health. We're reducing nitrogen discharge from sewage treatment plants, we're implementing policies to reduce stormwater runoff in New York State, permitting new technologies to reduce the nitrogen from our homes and businesses which finds its way into our water. We're doing these things because we care deeply about the health of the Long Island Sound. We're doing these things because it is our goal to bequeath a cleaner, more vibrant Long Island Sound to future generations. And we demand that the same Federal government which has declared the Long Island Sound to be an estuary of national significance to join us in this effort.</p>
RESPONSE	Please see the General Responses to Sediment Contamination (0005R) and Site Management and Monitoring Plans (SMMPs) (0302R).

COMMENT	The report also notes that among the many unanswered questions are regarding the impact of fishing in the impacted areas. Suffolk County would recommend that you answer those questions, and do a cost benefit analysis, considering that activities in the Sound generate approximately 8.5 billion annually.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	Finally, the Suffolk County Department of Health Services will be providing more detailed information throughout the comment period, but we do not believe that the plan as presented is consistent with our efforts to protect the Long Island Sound. We are opposed to the plan, and we will use all options available to us to oppose it. I urge you to go back to the drawing board, work with the stakeholders on both sides of the Sound and do better than this.
RESPONSE	Please see General Response to Open Water Placement (0004R).
Ed Romaine, Town of Brookhaven, NY	
COMMENT	We started tonight with a --we were treated to a public lecture about this program, and I assume that's because we had seven days from the release of this program to digest 1,300 pages of highly technical information. That's not a good start.
RESPONSE	Please see General Response to the Public Involvement Process and NEPA (0003R).
COMMENT	But it may not, and I don't believe it is, environmentally sensitive to the needs of the Sound or those that live in and around this estuary.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	Long Island Sound is one of 15 national estuaries. There aren't that many in this nation. It should be treasured as such.
RESPONSE	Please see General Response to Long Island Sound as an Estuary of National Significance (0015R).
COMMENT	Read the claims that 95 percent of the material dumped will go into the holes that you have dug in the Sound. I found that hard to believe with the currents, the tide and the storms.
RESPONSE	Please see General Response to Placing of Dredged Material in the Aquatic Environment (0154R).
COMMENT	Open-water dumping is something that I believe has a tremendous impact on the fish that use the Sound and other marine life. I think it's negative. When we've looked at this report -- and I will be the first to admit I haven't read all 1,300 pages -- one question popped up. Where's the biology? Where's the biology in the sense of studies of marine life, the impact on marine life and what it's going to do? All I've known is from dumping in the Sound, particularly in the Western Sound, we've seen a zone that some people would say is a dead zone, where many types of marine life cannot exist.
RESPONSE	Additional information on the DAMOS program and its history with LIS has been added to Chapter 3 of the DMMP (Section 3.21.1) and is included in the PEIS (Section 2.4).
COMMENT	I would ask you to think about other alternatives.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).

COMMENT	I'm concerned about the toxins contained in the mud and silt that you would dump into the Sound. I think it's something that should not be done.
RESPONSE	Please see General Response to Sediment Contamination and Dredged Material Sampling and Testing (0005R).
COMMENT	I believe the alternative -- you had ten years to come up with a program. \$1.7 million, the goal of which was to at least lessen the amount of dumping in the Sound. That has not taken place.
RESPONSE	Please see General Response to the DMMP Goal to Eliminate or Reduce Open-Water Placement or Phase-Out Open Water Placement (0042R).
COMMENT	In fact, the proposal before us would dump 50 million cubic yards in the next 30 years. As opposed to the original ten years ago, when you proposed 20 million cubic yards in 20 years, which Governor Pataki said absolutely not and gave you ten years to work on this program.
RESPONSE	The DMMP went into greater detail in identifying the dredging needs for both the Federal government and non-Federal parties. The DMMP also identified those harbors with recurring dredging needs. In order to include all Federal navigation projects in the analysis, the DMMP examined a 30-year period instead of the 20-year period included in the preliminary assessment. This more in-depth examination of dredging needs resulted in the 50 million cubic yard total. Whether all or a portion of this will actually be dredged over the next 30 years will depend on many factors, including the availability of funding, demonstrating a navigational and economic need for each proposed project, and the costs of doing the work.
COMMENT	I don't believe you succeeded in your goal. I believe the plan you put forward fails in every aspect, and it's certainly not a plan I could support as Supervisor of the town.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
Scott Russell, Supervisor, Town of Southold, NY	
COMMENT	Hello, Scott Russell, Supervisor Southold Town. The Town of Southold, the Town Board and the people of Southold are strongly opposed to the continued disposal of dredged water in Long Island Sound.
RESPONSE	Please see General Response to Open Water Placement (0004R).
COMMENT	The economy of Southold Town is dependent in part on fisheries, shell fisheries and recreation in the Long Island Sound. Multi-generation lobstermen have reportedly expressed their concerns of declining population of lobsters around Fishers Island. Has a recent study been conducted in New York State in water that analyzes declining lobster population and past dredge-spoil events?
RESPONSE	The DMMP PDT attempted to cast a wide net to draw in as much data as other agencies and parties were able to provide for fisheries, and all other resources that were evaluated. Connecticut agencies had significantly more data available on fisheries resources in LIS that they were able to provide to the PDT than did NY agencies. We could only work with the data provided. Going forward, the DMMP recommends continuing the role of the interstate and inter-agency Regional Dredging Team. The RDT, at the state level, should make efforts to improve resource data collection, not just for fisheries but for other resources of concern. That new information should be used by all parties proposing dredging projects in the future to ensure that resource impacts can be minimized, regardless of the placement method used.

COMMENT	In 1987 Congress designated the Long Island Sound as an estuary of national significance. Following World War II the ecological health of the Sound began to decline. To address the decline, the Long Island Sound study, which was authorized by Congress in 1985, established a collaborative partnership of Federal, State, interstate, local government agencies, industries, universities and community groups in an effort to restore and protect the Sound. Partners are currently working together to implement a comprehensive conservation management plan to maintain the health of the ecosystem, restore coastal habitats and increase public awareness of the Sound.
RESPONSE	Please see General Response to Long Island Sound as an Estuary of National Significance (0015R).
COMMENT	Since 2005, the Long Island Sound Futures Fund has invested 13 million in 306 park projects in communities surrounding the Sound. With grantee match of 25 million, the Long Island Sound Futures Fund has generated a total of 38 million for locally-based conservation. The disposal of dredge spoil is counterproductive to this collaborative effort.
RESPONSE	Please see the General Responses to Sediment Contamination (0005R) and Site Management and Monitoring Plans (SMMPs) (0302R).
COMMENT	The Town is struggling to meet stormwater control regulations under New York State spending caps. The Town is subject to New York State pollutant discharge elimination system and, obviously, the MS4 program at the Federal level. We've spent a great deal of money to comply with these programs. We've adopted stormwater management programs. We have done everything we could to comply with Federal and State mandates. We're asking that you do the same.
RESPONSE	Please see the General Responses to Sediment Contamination (0005R) and Site Management and Monitoring Plans (SMMPs) (0302R).
COMMENT	For one case in point, Page 3-26 of the Draft Programmatic Environmental Impact Statement for August 2015 considers using 450 acres of Mattituck Agricultural Fields as a potentially feasible area to dispose of over 2 million cubic yards of dredged water for deep water. Has that area been addressed yet? Has it been identified? I'm unaware of 450 acres that would have simply the infrastructure to move over 2 million cubic yards in the Town of Southold. How was that alternative identified? Like I said, has the area been identified?
RESPONSE	The USACE used a systematic method to identify open spaces in the coastal zone of LIS. The land owners of the parcels identified were contacted and interviewed regarding their willingness to use the land for dredged material dewatering. The agricultural fields located on Oregon Road in Mattituck, NY (site NY-1) were identified as "potentially feasible in the future". Multiple (16) private land owners, as well as James McMahon of Southold Department of Public Works, were interviewed regarding these fields. The interview indicated that most of the site is currently in agricultural use (corn, field crops, vineyard, nursery stock, sod); 7 of the 16 parcels have Transferred Development Rights (TDR) to the Town of Southold; per Chapter 70 of the Town Code TDR restricts future uses of the site to agriculture only. Dewatering areas could potentially be constructed on the remaining parcels. It may be possible for the town to approve zoning changes if they desire upland placement opportunities. However, some local officials have requested that this site be removed from consideration for such use. Section 3.8.1 of the PEIS has been updated to indicate that "[d]uring the public review process, local officials requested that this site be removed from further consideration as the Town would not support that use".

David Bergen, Town of Southold, NY	
COMMENT	I'm here to voice my objections to any proposal to either extend or create dredge spoil dumping areas in Long Island Sound.
RESPONSE	Please see General Response to Open Water Placement (0004R).
COMMENT	While I realize that the slides depicted the movement of water, and the physical qualities of sediment are quite different from those in the water, it's not difficult to project that the finer sediments dumped in the Sound will migrate into Southold Town waters either from New London or Cornfield sites.
RESPONSE	With the nearly 40 year record of DAMOS surveys, there have been multiple opportunities to evaluate the passage of large storms (both hurricanes and nor'easters) on the dredged material deposits on the seafloor. As discussed in Section 4.4.1 of the PEIS, these investigations have demonstrated long-term stability of the deposits even at the most exposed energy sites.
COMMENT	While it's proposed these sites will be closed, both languages seem to indicate that if this program is approved, these sites could either remain open or be reopened as needed.
RESPONSE	Because these open-water sites are open and currently available for the placement of dredged material, they were considered alternatives for the analysis conducted in the DMMP and PEIS. The future status of these sites is unknown and is not determined by the DMMP. These site may or may not be available in the future for the placement of dredged material.
COMMENT	Several of the Connecticut rivers where dredge materials originated include highly industrial operations that as such leave a high likelihood that the dredge materials would contain possible organic and inorganic materials and metals.
RESPONSE	Please see the General Responses to Sediment Contamination (0005R) and Site Management and Monitoring Plans (SMMPs) (0302R).
COMMENT	This material will not simply sink to the bottom and stay there. The material deposition will be impacted by the strong tides located in Eastern Long Island Sound as well as major storms and turbidity caused by large shifts that navigate to the Sound.
RESPONSE	With the nearly 40 year record of DAMOS surveys, there have been multiple opportunities to evaluate the passage of large storms (both hurricanes and nor'easters) on the dredged material deposits on the seafloor. As discussed in Section 4.4.1 of the PEIS these investigations have demonstrated long-term stability of the deposits even at the most exposed energy sites.
COMMENT	While we need to create the bumpy [dumping] grounds as determined by the EPA in 2005, a significant environmental designation was made to this area for the affirmative determination for Long Island Sound by the same Federal agency, the EPA, on February 11, 2011 regarding designating all of Long Island Sound as a no discharge zone. As one of the individuals involved in the joint task force between New York and State of Connecticut, we were thrilled when this determination was made in 2011 which resulted in the entire Sound to be designated a no discharge zone. I find it amazing the Army Corps of Engineers would give consideration to extending the dumping of potentially toxic materials into the valuable estuary subsequent to the Federal and State designation granted in 2011.

RESPONSE	No Discharge Zones (NDZ) prohibit the discharge of both treated and untreated sewage from vessels of all size and make, and are not intended to regulate other pollutants or sources. A NDZ is intended to provide a higher level of water quality protection for uses of the waters covered by the designation that rely on low bacteria levels, like swimming and shellfish harvesting. Under Section 312 of the Clean Water Act, states are authorized to designate some or all of their state waters as NDZ, subject to EPA approval, which is based almost exclusively on whether there are adequate sewage pumpout facilities to serve the area covered by the designation. Considering the negligible impact of dredged material disposal on LIS water quality, which is well documented, EPA does not see any inconsistency in the NDZ designation for LIS and continuing to manage dredged material under the current management framework.
COMMENT	I would urge the Army Corps of Engineers to consider the negative environmental impact which the proposed extension to this program will have, realizing that while proposed sites are physically located on the Connecticut side of the Sound, science-based knowledge demonstrates that they will impact the waters within the jurisdiction of New York.
RESPONSE	Please see General Response to Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
Pamela Pierce, Village of Asharoken, NY	
COMMENT	Good evening, everybody. I am from the Village of Asharoken, Deputy Mayor of the water coastal community and we would like to go on record for opposing the dumping, the open-water dumping of the dredging spoils in the Sound. Thank you.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
Valerie Cartwright, Town of Brookhaven, NY	
COMMENT	It is important that we recognize that dumping dredge spoils in our Long Island Sound creates an environmentally toxic situation.
RESPONSE	See General Response for Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	This plan proposed by the Army Corps should not be given great weight or credence. Any plan that speaks to dumping contaminants into our waters is a bad plan.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	I believe that the Army Corps was less diligent than they should have been in their efforts to evaluate the re-use of alternatives, as well as other alternatives to this project.
RESPONSE	Please see General Response to Open Water Placement (0004R).
Anthony Graves, Town of Brookhaven, NY	
COMMENT	The Town would request additional time to review the document.
RESPONSE	Please see General Response to the Public Involvement Process and NEPA (0003R).
COMMENT	I'd like to note the DMMP was developed with equal weight to all alternatives, but it was our understanding from the reading that the letter from the Governors of New York State and the State of Connecticut, which in a way started the process, identified a preferred alternative, which was to reduce or eliminate open-water dumping of dredge spoil. So, that alternative should not be analyzed on an equal weight. We feel that the plan missed its mark when it gave equal weight to all of the alternatives.

	The assigned scores and the modeling that were done have many, many assumptions that go into them. We think that some of those are flawed.
RESPONSE	By Federal law, all practicable alternatives must be evaluated to identify the least costly, environmentally acceptable alternatives. As a result; all alternatives were weighted equally in the screening analysis.
COMMENT	Again, going back to the letter and the intent of the whole exercise which started ten years ago, was to reduce or eliminate open-water disposal, so the assumptions going into the model, and in particular, the scores assigned should have weighted alternatives towards the elimination of open-water dumping.
RESPONSE	Please see General Response to the DMMP Goal to Eliminate or Reduce Open-Water Placement or Phase-Out Open Water Placement (0042R).
COMMENT	The recommendations in the plan, from what I've seen so far, are what should have formed the backbone of the plan. It's what should have been done over the past ten years.
RESPONSE	The LIS DMMP does not recommend specific dredged material placement solutions for specific Federal Navigation Project activities, rather it is intended to serve as a resource to inform future dredging projects of various alternatives that should be evaluated in developing a recommended plan of action.
COMMENT	And finally, I want to speak to the outreach that has been done. The involved agencies, in particular the New York State Department of Environmental Conservation and the New York State Department of State, have expressed their disappointment in the plan and identified what they feel are shortcomings and its failure to meet the goal in writing. And so I would suggest that that means the outreach has not been sufficient.
RESPONSE	See General Response to Agency and Stakeholder Coordination (DR0074R).
COMMENT	This is a draft plan, and I would hope that any kind of a final plan would include renewed outreach and a renewed focus on the goal of reducing or eliminating the disposal of dredge spoil in the open waters of the Long Island Sound.
RESPONSE	Please see General Response to the DMMP Goal to Eliminate or Reduce Open-Water Placement or Phase-Out Open Water Placement (0042R).
Bruce D'Abramo, Village of Port Jefferson, NY	
COMMENT	But I thought it was very interesting in the hour presentation that you gave, that from two different perspectives, from a cost perspective and from an environmental perspective you separated the impacts and the impacts on cost and on the environment based upon the particle size. And you very neatly talked about coarse sand and sandy silt and some of the finer particles. Unfortunately, during the dredge disposal project it's not quite that easy to separate those different particles.
RESPONSE	Dredge material classification is based upon the relative percentage of a material type. "Sandy" sediments are generally characterized as those sediments in which 90+% of the material is composed of sand. USACE understands that a wide range of heterogenous material exists. In cases where the sediments are composed of greater than 15% fine material, the material is generally classified as "silty" material.
COMMENT	This draft plan that you have presented goes against everything that the EPA and the responsible public agencies have been doing in the past for the Long Island Sound. Port Jefferson Village is very proud of how we have managed our stormwater to keep pollutants from entering the Sound, and we will have to bear the impacts of what the Corps of Engineers does on the north side of the Sound.

	We're opposed to the plan as it's been presented to us, and like I said, we will be providing additional written testimony.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
John German, Long Island Sound Lobsterman's Association	
COMMENT	I'm president of Long Island Sound Lobsterman's Association and I represent the Association here tonight. I would like to say that as an Association we are not in any way opposed to dredging; we are 100 percent opposed to dumping in the Long Island Sound.
RESPONSE	Please see General Response to Open Water Placement (0004R).
COMMENT	We -- the State of New York has spent a lot of time and money and effort in cleaning up the Sound and putting the money in there, and it seems somewhat counterproductive that the State of Connecticut wants to fill it back in with their debris, but we're not doing that because it's economically easier to them.
RESPONSE	Please see the General Responses to Sediment Contamination (0005R) and Site Management and Monitoring Plans (SMMPs) (0302R).
COMMENT	Our solution would -- and always would be to take the dredge material and put it an upland site. Connecticut has plenty of those places, I'd say.
RESPONSE	Please see General General Response to Upland Placement Alternatives for Dredged Material (0085R)
COMMENT	We need a lot of sand here for these beaches from Sandy that we could just bump it up on the beaches and let the people lay in it and see how they like it. You say it's perfectly safe, let them do that.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R).
COMMENT	I know you are not going to do that, because you are just going to take it out of the Sound, open up them doors in the bottom of the dredge boats and dump it. Out of sight, out of mind. The only people it's going to affect is going to be me and my fellow fishermen, because probably more than anybody in this room, we're in it every day, and we'll get bathed in it, sprayed in it, we get to float around in it and dumped in our food source. So, we are very much opposed to this, and that's basically why. Also, I do not have that much faith in the EPA as has been demonstrated here in the last two weeks as a monarching agency, and I don't know who we'd get to do it, but certainly not them.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R).
Adrienne Esposito, Citizens Campaign for the Environment	
COMMENT	It said a document would be prepared that, quote, "would identify feasible and environmentally sound alternatives that would establish future protocols for dredge material management. These alternatives would include the following," and then it listed them, and then it would say, "the goal was reducing or eliminating the need for open-water disposal."

	This plan does not do that. This plan uses cost as a prioritization factor which eliminates safe disposal of the dredge material and prioritizes open-water disposal in all four sites. Basically, we feel this plan turns Long Island Sound into a landfill for the next 30 years.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R).
COMMENT	What are some of the options that it clearly looks like to us that you have looked at and dismissed? Well, number one would be the reclamation of mines. I remember very clearly ten years ago when Pennsylvania said they had 3,000 abandoned mines that they would like dredge material to be used for reclamation purposes. The plan refers to one in Pennsylvania that is 277 acres and then dismisses it and says it's outside the study area. Are there 3,000 other mines that this project evaluated? No, they are not in this plan at all.
RESPONSE	The mine reclamation alternative in Hazelton, Pennsylvania was not dismissed because it is located outside of the study area. It was dismissed because the costs for using this alternative site were calculated and it was significantly more expensive than other alternatives analyzed. Section 4.9.12 of the DMMP has been edited to provide additional discussion of mine reclamation demonstration efforts using dredged marine sediments in Pennsylvania.
COMMENT	What about combined disposal facilities? Well, combined disposal facilities were also projected out in here. There's a number of them that are listed in the project as potential ones, but it said that they are too expensive. Not only does it say it's too expensive, but we particularly liked this quote, which I'll read you even though I'm running out of time, but, you know, after ten years, maybe you will give me an extra minute. The Draft dismisses the combined disposal facilities because, quote, "it requires significant public investment."
RESPONSE	The DMMP does not dismiss CDFs or any other alternative. The DMMP identifies a number of CDF opportunities in the LIS region, many of which have been the subject of prior studies over the past four decades. As the comment states, the DMMP does describe CDFs as requiring a significant public investment to implement, and as needing to be coordination between all levels of government, with long-term site management by a state agency or port authority. This is precisely how the large scale CDFs at Norfolk Harbor (Craney island) and Chesapeake Bay (Poplar Island) were developed, built, managed and expanded over the years. In LIS non-Federal interests will need to advocate and sponsor the studies, design and ultimate construction of such facilities if any are ever to be developed. Until that interest and willingness to fund such regional alternatives develops, projects that would fill only a small portion of such facilities have nothing to consider. As with all the alternatives presented, the DMMP is a guide to the USACE, other agencies, the states and private dredging interests as to what alternatives could be considered.
COMMENT	It says that we can't have them because we would need to have coordination between all levels of government with long-term management by the State agencies. But this is what we expected and it was anticipated this DMMP would do. Have an overarching guidance document that would coordinate agencies and have an implementation plan that would meet the satisfactory goal, or meet the intended goal of phasing out open-water disposal.

RESPONSE	The DMMP does not dismiss or discount any practicable alternatives to open water placement, including the construction of CDFs. The DMMP describes the authorities for Federal involvement in CDF construction and the requirements for non-Federal partnership and cost-sharing. If construction of a CDF were the Federal base plan that could be pursued in partnership with a non-Federal sponsor. Actual implementation of CDF construction or of any alternative beyond the Federal base plan must begin with identification of specific projects that would use such an alternative and identification of non-Federal sponsors proposing such facilities and agreeing to share in their cost. It is therefore beyond the DMMP to make specific proposals for development of any facility.
COMMENT	We will submit some more extended comments, but the bottom line is that we need to look at these dredge materials as a raw material, not a waste product.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R).
COMMENT	And, in fact, this plan is one that totally misses the mark. It's not only woefully anemic, it needs to go back to the drawing board. Long Island Sound is not a landfill, and we can't accept it to be used as such.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
Bill Toedter, North Fork Environmental Council	
COMMENT	As the EPA's part of the DMMP review and drafting process, I can ask them directly, do you remember something called the Clean Water Act, which establishes the basic structure for regulating quality --water quality standards for surface waters. Under the Clean Water Act, the Office of Water was created to, among other things, restore and maintain oceans, watersheds and the aquatic ecosystems to protect human health, economic and recreational activity and to provide healthy habitat for fish, plant and wildlife. The plan to continue dumping of dredge spoils in Long Island Sound runs completely contrary to the spirit of Clean Water Act and directly in the face of the charge of the Office of Water.
RESPONSE	The States of New York and Connecticut and the Federal government have regulatory authority over dredging and placement of dredged material. In order to be considered for placement of dredged material into a marine environment, the dredged material must undergo rigorous testing that indicates that the dredged material is suitable for placement at a marine site. There is no regulatory prohibition of placement of dredged material in a marine environment but rather the requirement to seek and receive approval from the appropriate regulatory agencies for that placement. All of the regulatory agencies that oversee Long Island Sound have procedures in place that would allow for the placement of dredged material in a marine environment.
COMMENT	In the past episodes of dumping in these sites, both commercial and recreational fishermen will tell you of deep dropoffs in catch.
RESPONSE	Please see General Response for Environmental Degradation and Economic Cost of Open-Water Placement (0002R).
COMMENT	In fact, many lobster boats in Southold, Greenport and Fishers Island have closed up shop because of the large scale die-offs after previous rounds of dumping.
RESPONSE	Please see General Response to LIS Lobster Population Decline and Impacts (0203R)

COMMENT	The purpose of the DMMP was supposed to look at alternatives to dumping in the Sound. But how can you properly evaluate current alternatives when you are using past histories and also old data? Where is the new investigation in the Sound dump sites on the nearby ecosystem? Where's the new and current data?
RESPONSE	On an annual basis, the DAMOS Program reviews not only the amount of dredged material placed at all New England aquatic sites, but also the location of each individual scow placement (all scows are required to be outfitted with highly accurate GPS, draft sensor which indicates when a load is released, and data logger). This information is used to prioritize which sites are surveyed in a given year. Survey recommendations are reviewed with the USEPA as well as state officials at New England Regional Dredge Team meetings, held quarterly to make sure that any concerns the states have are addressed. Sites which have had only limited dredged material placement in a given year are generally not surveyed unless an issue had been identified in a previous survey. The New London Disposal Site was visited in 2007 as noted in the comment (DAMOS Contribution #180); in 2010 to collect sediment cores through the dredged material deposits for laboratory analysis as a measure of stability (DAMOS Contribution #189); in 2014 to collect sediment-profile and plan-view imagery (DAMOS Data Report 2014); and recently in 2015 to perform detailed mapping of the site (DAMOS data report expected in winter 2016 that will evaluate long term stability). Given the nearly 40 years of experience of the DAMOS Program, this monitoring frequency is considered sufficient for the level of placement activity at the New London Disposal Site and the lack of previous issues identified there.
COMMENT	It doesn't make sense. We understand the need to dredge harbors and channels and that the spoils have to go somewhere, but the least-cost alternatives are not often the best alternatives and often result in greater long-term costs in terms of dollars and both lost and damaged ecosystems. The cost of dumping in the Sound is too great and not acceptable.
RESPONSE	Please see General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R)
COMMENT	We implore you to consult with many of the local representatives and County representatives who have been here today and stated their opposition to this plan. Listen to the people and consider the facts.
RESPONSE	Please see General Response to Adequacy of Agency and Stakeholder Coordination (0074R)
Sarah Anker, Suffolk County Legislator	
COMMENT	I'm here today to express my concerns for the 2015 Long Island Sound Draft Dredged Material Management Plan that will allow contaminated dredge spoils, and again maybe that's something that can be discussed. How contaminated are these spoils? That's the main concern that I have. And I was actually here in 2005, I was here testifying. In 2013, along with Adrienne and some of the other folks here, I was here giving testimony about my concerns with the contaminated dredge spoils.
RESPONSE	Please see General Response to Sediment Contamination and Dredged Material Sampling and Testing (0005R)

COMMENT	So I'm going to go down a couple of questions. I have a couple of questions, and I don't mean to sound disrespectful in any way, but did you not understand that we, the residents of Long Island, public officials and professional researchers do not want and will not accept the dumping of contaminated dredge spoil materials into Long Island Sound that will decimate the valuable economic and our cherished water here on Long Island? I mean, we get a huge amount -- billions of dollars come from our Long Island Sound, it really does. Tourism, fishing, aquaculture -- is that right, Adrienne?
RESPONSE	Please see General Response to Environmental Degradation/Consequences and Economic Cost of Open-Water Placement (0002R)
COMMENT	<p>It seems somewhat incredulous to us that we are here revisiting this issue of whether these spoils should be dumped back into the water from which they are taken. It's a complicated issue, your study speaks to that, and I can speak to that on a personal level as the Town of Southampton Supervisor where we have several of the red points on your map there, but also where we undertake dredging projects on a very regular basis.</p> <p>We don't have the authority to do what we want with that. We need to get the authority from several other agencies, such as the Department of Environmental Conservation, Fish and Wildlife. Why? Because this is such an environmentally-sensitive issue, and we are bound to find drain and spoil sites for these -- for what we dredge. But never is it an option to put it back where we took it out from. That is just never permitted, so why that would even be contemplated on a scale of this magnitude is incomprehensible to me.</p> <p>We recognize that cost is an issue, but we also have to understand that the long-term costs here tend to multiply, and we know that when it comes to environmental protection what we pay or don't pay today, we pay that much more later on. And so it's extremely counterintuitive to think that by putting back what we felt we had to take out, we know we have to take out, (a) puts back what was bad, and (b) only multiplies this issue. We're only going to have to take it back out again some other time. Because if we have to take it out now, we're going to have to take it back out again. So why a permanent solution to this is not found and one that makes sure that the environment is 100 percent protected here.</p>
RESPONSE	The States of New York and Connecticut and the Federal government have regulatory authority over dredging and placement of dredged material. In order to be considered for placement of dredged material into a marine environment, the dredged material must undergo rigorous testing that indicates that the dredged material is suitable for placement at a marine site. There is no regulatory prohibition of placement of dredged material in a marine environment but rather the requirement to seek and receive approval from the appropriate regulatory agencies for that placement. All of the regulatory agencies that oversee Long Island Sound have procedures in place that would allow for the placement of dredged material in a marine environment.
COMMENT	The words "environmentally acceptable" came up in your report, and the other thing we learned is what was once environmentally acceptable, we have come to understand simply does not meet a standard that is acceptable in the long term and by today's standards. So what was environmentally acceptable some years ago, more often than not simply does not meet that threshold today, and we -- if we're spending money to fix, we cannot dump stuff back in again. So, please, this plan is simply not acceptable.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.

Mike Folley, Sound Park Heights, NY	
COMMENT	That is what this is all about, but when you are taking stuff out of water and you are putting it back into some other water, I don't care how much sampling you do, you are sampling less than one percent of what you are putting in there, which means it's not an exact science. No matter how many times you want to say it's an exact science, that there's six-and-a-half percent toxic stuff there, it could be 16 percent, you don't know, because you cannot test that quantity in sufficient quality to ensure what you are putting in.
RESPONSE	Please see General Response to Sediment Contamination and Dredged Material Sampling and Testing (0005R)
COMMENT	Everything that comes out of the water should stay out of the water. Put it someplace out of the water. Build a sand dune with it. Put it in those mines that I heard. That's a very good solution. But to me, to put it into the Long Island Sound just makes absolutely no sense. None whatsoever.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Sid Bail, Wading River Civic Association, NY	
COMMENT	I'm president of the Wading River Civic Association. We're a little community on the shores of the Long Island Sound...All I can say is based on what I've seen so far, you need a new plan.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
Jeremy Samuelson, Concerned Citizens of Montauk, NY	
COMMENT	<p>I serve as executive director of Concerned Citizens of Montauk. I represent over 1,600 member families, individuals and businesses that live and work within our community. For the record, Montauk is New York State's largest commercial fishing port. It took me over two-and-a-half hours to get here today. This public meeting schedule is a joke. I sit here seven days after 2,000 pages, when you include appendices, have been released to the public. I would have had to have read 285 pages a day over the last week to digest this information. You have three more public hearings that are scheduled, and the announcement of an additional public hearing apparently from the Colonel this evening, no indication of a date or place. I would urge you strenuously out of the gate to extend the public comment period to a full 120 days, and to add additional public hearings, particularly in the Town of Southold, which will be directly affected by this project.</p> <p>All four public hearings that are currently noticed, with the exception of the one that has been announced this evening, are scheduled to occur within ten days of the publication of this information. This is completely unacceptable.</p>
RESPONSE	Please see General Response to Public Involvement (0003R).

COMMENT	More substantively on the project itself, or the report itself, I should say, this has been ten years in the making, and yet it is little more than a doubling down on the bad policies that were essentially rejected by the community and two Governors a decade ago. You have increased the volume of the material you projected to dump, and you have completely avoided any attempt to adopt updated practices that do anything other than dig a hole and put material in it. That is not the direction you received from the two Governors a decade ago. As was told to you today, open-water dumping is not a solution here. Your direction when you commenced this initiative was to go find an alternative to that very proposal. By that measure, you have failed your task.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	It appears to all who have taken a look at this that you do not have a problem regarding dredge spoil, you have a budgetary problem. You made a rather critically important environmental decision based on budgetary constraints. You have all but admitted here tonight that if you had more money, you would do something different. If that is the conclusion of your report, then your next step should not be to follow through with the recommendations in your report, it should be to go find a bigger budget. A small budget is not a justification for doing the wrong thing environmentally, not when it means people's lives and people's livelihoods.
RESPONSE	Please see General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R)
COMMENT	You have heard this evening from everyone from our Suffolk County Executive all the way down to Village board representatives and the citizenry of Long Island. You need to, please, head the notice that they have sent to you. Ten years ago, lawsuits were filed over this, and I assure you if you proceed down this path, that is exactly what you will find again.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Joe Saunders	
COMMENT	In the '70s, the Corps of Engineers started dredging in Connecticut River, and they knew it was toxic and they didn't want to put it on land and they didn't want to dump just offshore, because it would come back to them. This (indicating) is a Newsday article from the '70s. They figured out where the State boundary line was, and they moved their barges two to 500 feet north of that line and dumped. About a year later, the brown tide appeared, and a couple years it was called the red tide, but the Sound has never been the same. It's been going downhill for the last 40 years.

RESPONSE	<p>From the mid-1800's to the mid-1980's, the Federal channels in the CT River and its tributaries were dredged every year. Dredged materials from Essex Cove and below were typically placed at the CSDS in LIS. Materials from up river areas were typically placed in river or on shore in the valley. Since the 1980's, while dredging has been less frequent, the disposal methods typically used above and below Essex have remained the same. Most dredged material dredged from the CT River has been sandy material. Only those materials in certain tributaries and near the river mouth have been silty material. All materials tested have proven to be suitable for open-water placement if silty, or for use as nourishment if sandy. No significant contamination has been found in CT River dredged materials. Although CSDS is a dispersal site, depths at the site exceed 150 feet, and the site is located at least 3 miles from the nearest Connecticut shore and more than 4 miles from the nearest New York shore, it is unlikely material that moves from the site reaches nearshore areas. Material placed at the site joins the much larger load of material carried into the Sound by the river naturally.</p>
COMMENT	<p>When you see news events of the porpoises in the Sound, they're lost. They don't stay too long, they get out into the ocean. Twice in the last 40 years, Newsday had two different stories that marine biologists found that there was not enough oxygen in certain parts of the Sound to support marine life. Imagine that, not enough oxygen.</p>
RESPONSE	<p>Please see General Response to Hypoxia and Nutrients (0031R)</p>
COMMENT	<p>Now, the solution. Take the dredge out, put it on Connecticut's land, dry it out. Now you process for screening, it's sophisticated, you can tell what's clean, what's not. Sell that to municipalities as clean fill, as beach replenishment. Take the toxic stuff and do a high-burn, high-temperature burn-off in incinerators. They have the ability to do this.</p> <p>Then you take that toxic stuff, don't put it on top of a landfill, it will just be a contamination itself, because if it's toxic, it's not clean. So what do you do? You use this special stuff for roadways, large parking lots where it's protected by the asphalt. Why use good dirt when you are building a parking lot for a major mall, why use good dirt for a highway?</p>
RESPONSE	<p>Please see General Response to Upland Placement Alternatives for Dredged Material (0085R)</p>
Joel Ziev, Long Island Sound Citizen's Advisory Committee	
COMMENT	<p>This DMMP says that "all future projects will be reviewed by the regional dredging team using alternatives included in the DMMP." Unfortunately these alternatives are lacking.</p>
RESPONSE	<p>Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)</p>
COMMENT	<p>I brought to that meeting a series of pamphlets, a series of studies, that the Corps has made to their R&D in developing alternative uses. None of those were presented formally to the meeting, and none are included in this DMMP.</p> <p>The DMMP is operating as if it's totally isolated from the R&D arm of the Corps, and all the plans and all of the studies and all the pamphlets and all the information they have provided is not being used. It's like we're in separate universes, a separate world here, and we're talking about relocating material, dumping it in Long Island Sound. We're not dumping anything. You want to take material, evaluate it, take it and appropriately place it so it can be used in the best possible way.</p>

RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	The DMMP needs to include alternatives, needs to have in it alternatives that will be referred to after submitting a proposal after the fact. Those alternatives are not included in this DMMP, and yet the DMMP says that upon other applications they will be cited and referred to other alternatives as listed in the DMMP. The DMMP is really lacking in those alternatives and the Corps has lists on them and books on them. They should be included in this document.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	The second point I want to make, there has been intensive monitoring of the four existing sites over the last number of years, significant monitoring. We have not seen the results of that monitoring in this DMMP. What has happened over the last 30 years around the four sites in terms of the animals, the fish, all the plants, everything living in there? What are the results of all the studies, all the dollars we have spent to monitor these sites? That should be reported as part of the DMMP, because we're giving guidance to the future and how do we work on it.
RESPONSE	Additional information on the DAMOS program and its history with LIS has been added to Chapter 3 of the DMMP (Section 3.21.1) and is included in the PEIS (Section 2.4).
Stuart Paterson, Northport Charters	
COMMENT	You cannot dump toxic spoils in Long Island Sound.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R), and General Response to Sediment Contamination and Dredged Material Sampling and Testing (0005R)
COMMENT	People have been working very hard for decades now to clean up the Sound. It's getting to a point where I can start to see it. Winter flounder are starting to come back. That's not fluke, that's winter flounder we used to catch 30 years ago. We're seeing winter flounder June, July and August when we set up and fish. We're starting to see black sea bass. I want to touch on this. Black sea bass was not in the Sound when I was a child growing up in Huntington. Now black sea bass, which is a great fish, it's a fun fish to catch, it's a great tasting fish, actually it didn't exist when I was a kid, but now I can target charters and take people out to recreate on Long Island Sound. Long Island Sound is a gem.
RESPONSE	Please see the General Responses to Sediment Contamination (0005R) and Site Management and Monitoring Plans (SMMPs) (0302R).
COMMENT	You cannot dump toxic spoils in Long Island Sound. Find an alternative way. It has to be done. I come out of Northport and they built Bird Island in Northport on the spoils when they made that channel years ago, and now the Osprey has come back, Great Blue Herrings all over the place[.]
RESPONSE	Please see General Response to Confined Aquatic Disposal Cell Development (0008R)

Michael Kaufman	
COMMENT	I come from the Town of Smithtown and we do border on the Sound, and so I'm quite experienced with a lot of these issues, and frankly, a lot of the governmental agencies involved. But we do have a lot of problems. My harbor, for example, is very, very close to being toxic, and that's happened in the last 20 years. The Sound is clearly degrading. But here's the real problem. We go through hell getting permits to dredge. We go through hell trying to be careful. I can't place a single piece of sand without multiple layers of review. We do it right, though, we put it on our beaches. Fortunately, I have pretty clean fill. If this plan essentially lets Connecticut do what we can't and don't ever dare do, and frankly would never do because we're also subject to Army Corps of Engineer regulations, the DEC, I can give you a list of regulatory bodies we have to deal with. Why is Connecticut being treated differently? We've got a national estuary program in place there, we've got EPA rules which essentially to one degree or another according to the comments I'm hearing here, are being ignored. Maybe that's a harsh word, but that's really what it boils down to.
RESPONSE	The States of New York and Connecticut and the Federal government have regulatory authority over dredging and placement of dredged material. In order to be considered for placement of dredged material into a marine environment, the dredged material must undergo rigorous testing that indicates that the dredged material is suitable for placement at an marine site. There is no regulatory prohibition of placement of dredged material in a marine environment but rather the requirement to seek and receive approval from the appropriate regulatory agencies for that placement. All of the regulatory agencies that oversee Long Island Sound have procedures in place that would allow for the placement of dredged material in a marine environment.
COMMENT	I think a lot of the plan right now is cost-driven, which is unfortunate. I've dealt with millions of dollars in terms of dredging. I know what costs are like, I know it's hard. But nonetheless, it seems as if frankly, the plan, the engineering aspects were very, very well done but they drive to one conclusion, and it is inconsistent with everyone's trying to do with protection for the Long Island Sound.
RESPONSE	Please see General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R)
COMMENT	I think it needs to be done a little bit differently. I think the methodology in classifying all this stuff is wrong. And I have 30 seconds, so I'll sum up quickly. I think you need to look at the model again. I understand the cost factors. I understand money is very, very tight. I see Army Corps budgets being cut left and right, but you can't use money as a justification for destroying a resource that a number of other agencies are trying to protect. It is simply inconsistent at this point in time, and Connecticut has got to realize that. I understand they are a different type of land form, and they have different problems from us. We're a sand island, they are bedrock. They don't have the beaches, we do, they don't have the opportunities we do for replenishment and dealing with the spoil. They have to find a better way. If they want to stay economically viable, they have to find something, and maybe this plan is not the best way to do it.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)

Adrienne Esposito, Citizens Campaign for the Environment - Second Testimony	
COMMENT	One is the issue of nitrogen loading. The plan talks about the importance of nitrogen loading into the Long Island Sound and all the work that we have done so diligently to reduce nitrogen loading, and yet the plan fails to quantify nitrogen loading associated with dumping 30 to 50 million cubic yards of fill back into the Long Island Sound. There's no mention of nitric flux. As you may know, the new science is telling us that rivers that are dying because of eutrophication in part is now caused by nitric flux, which is the decaying material contributing to nitrogen and the depletion of oxygen in those rivers. As we dredge those rivers and then redeposit that same material into the middle of Long Island Sound, we're adding to the nitrogen loading of the Long Island Sound, and yet nothing is mentioned in the plan about that nitrogen loading.
RESPONSE	Please see General Response to Nitrogen Loading (0153R)
COMMENT	The other thing I wanted to mention is that in the plan you talk about dispersion areas, and there's a claim that the first three sites, which is the --all of them except for Cornfield Shoals are non-dispersive areas, which I'm not even going to get into, but it classifies clearly Cornfield Shoals as a dispersion area, and yet in the plan there's no mitigation offered for that dispersion area, no increased monitoring, no parameters identified --and because it's a dispersion area, that's okay apparently because there's 11 different projects that will dump, you know, 2 million cubic yards of dredge into the dispersion area, which means it will be dispersed around Long Island Sound.
RESPONSE	As described in Section 2.1 of the PEIS, dredged material must be characterized as suitable for open-water placement before that alternative can be considered as an option. The characterization process is prescribed; if elevated concentrations of heavy metals, pesticides, or other toxic contaminants were identified, the material could not be placed in an aquatic environment without confinement. As confinement is not possible at a dispersive site such as Cornfield Shoals, such material could not be placed there. Given its high current environment, existing sediment at the Cornfield Shoals Site is coarser than what would be found in a depositional area. As such, for dredged material to be deemed physically compatible for placement at the site (in addition to the suitability based on chemical concentrations), it must be predominantly coarse-grained as well.
COMMENT	So in short, we have seen that there are six ocean dumping sites from Rhode Island to Maine, and yet you want to put four in Long Island Sound. Ocean --Rhode Island to Maine is 600 miles. The Long Island Sound is roughly 100 miles. Why do we need four sites when the entire northeast only needs six? It's because this is a plan for Connecticut to get away cheap.
RESPONSE	The waters of Long Island Sound, while subject to MPRSA under the Ambro Amendment, are waters within the territorial sea. In New England, in waters outside the territorial sea, there are four ocean disposal sites. There are also dozens of open-water sites within territorial sea waters throughout New England, including the four in Long Island Sound. Long Island Sound is no different than the rest of New England in terms of the number of sites for its length of coastline.
COMMENT	The plan hasn't assigned any value to the ecological degradation of Long Island Sound. So when you compare dumping, which you are saying has an ecological and economic impact of zero, to doing anything differently, the anything differently is looking too expensive, and that is the inherent flaw of this plan.
RESPONSE	Please see General Response to Environmental Degradation/Consequences and Economic Cost of Open-Water Placement (0002R)

Long Island Marriott, Unondale, NY - August 25, 2015	
Paul Molinari	
COMMENT	So my recommendations are that the plan should include a section in it on testing protocols and the biological, chemical, and physical criteria within the body of the report. You presented some of that right here in the presentations, but I would like to see something like that summarized in the report so everybody knows what it is without having to go into EPA's criteria or the Corps' manual to get that.
RESPONSE	Please see General Response to Sediment Contamination and Dredged Material Sampling and Testing (0005R)
COMMENT	I would also like to see - you know, right now you have classified dredge materials by soft types: sandy, silt, fine silt. I would like to see in the body of the report how that would line up with the criteria in determining what is suitable for the alternatives. I know sandy materials always are used for beneficial type of use. I would like to see that in the report versus the criteria that it has been tested on. I would also recommend that for unsuitable materials, none of it be exposed in the Sound, in the open waters, as you go into an upland facility within the -not within the body of the Long Island Sound.
RESPONSE	Please see General Response to Sediment Contamination and Dredged Material Sampling and Testing (0005R)
COMMENT	I think the plan should identify the means of how the disposal of dredge material will be tracked; make sure that it ends up in the appropriate designation.
RESPONSE	On an annual basis, the DAMOS Program reviews not only the amount of dredged material placed at all New England aquatic sites, but also the location of each individual scow placement (all scows are required to be outfitted with highly accurate GPS, draft sensor which indicates when a load is released, and data logger). This information is used to prioritize which sites are surveyed in a given year. Survey recommendations are reviewed with the USEPA as well as state officials at New England Regional Dredge Team meetings, held quarterly to make sure that any concerns the states have are addressed. Sites which have had only limited dredged material placement in a given year are generally not surveyed unless an issue had been identified in a previous survey.
University of Connecticut, Stamford, CT - August 26, 2015	
Robert Klee, Commissioner, CT Department of Energy and Environmental Protection	
COMMENT	We especially appreciate your science-based conclusion that a full range of alternatives remain available for the handling of dredged materials, including beneficial reuse, as well as placement at open water sites.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	Let me tell you why that approach is vital to Connecticut's needs. Maritime-related commerce provides nearly \$7,000,000,000 in economic output and 40,000 jobs in Connecticut alone. To sustain and grow this important sector of our economy, dredging projects are necessary to ensure safe and efficient use of our channels, ports, and harbors. These water resources are relied upon for recreational boating, ferries, waterborne commerce including fuel transportation activities, a naval submarine base, a sub manufacturer, and the Coast Guard.

	Connecticut's needs when it comes to dredging are more significant than other states that share Long Island Sound. The draft plan anticipates 52 federal navigation sites, but 60 percent will be in Connecticut. Total dredging needs over the 30-year period of this plan are expected to produce almost 53,000,000 cubic yards of dredged materials, but 75 percent of which will come from Connecticut's waters.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
COMMENT	<p>The draft thoughtfully addresses the challenge of handling dredged materials using traditional and new alternatives for beneficial reuse.</p> <p>In the past several years, for instance, Army Corps navigation projects have pumped sand directly onto Hammonasset Beach State Park in Madison.</p> <p>In the face of frequent and severe storms resulting from climatic change, we also envision greater use of suitable sediments for renourishing marshes and sand dunes; and other projects designed to protect natural resources, people, property, and infrastructure along our coast.</p> <p>Given the volume of dredged material excavated in our waters, beneficial reuse alone is not sufficient. More than 29,000,000 cubic yards will be fine grained and unsuitable for nourishment. The volume in New York is estimated at 4.5 million cubic yards. The large volume of material means the continued use of open water sites is necessary.</p>
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	All evidence from the past 35 years shows open water disposal is environmentally acceptable, does not diminish water quality, natural resources, aquatic life, or public health in Connecticut or neighboring states.
RESPONSE	Please see General Response to Environmental Degradation/Consequences and Economic Cost of Open-Water Placement (0002R)
COMMENT	Open water sites will meet strict standards. When materials can't meet these standards it must go elsewhere.
RESPONSE	Please see General Response to Sediment Contamination and Dredged Material Sampling and Testing (0005R)
COMMENT	I believe support for the full range of options for management of dredged sediments recommended in the draft DMMP is consistent with Connecticut's stewardship of Long Island Sound. We thank the Army Corps for recognizing this reality, and thank you for the opportunity to speak tonight. I will submit a longer version in written form.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.

Frank Mazza, Greenwich CT Harbor Management Commission	
COMMENT	Let's focus on the dredging of the Mianus River. That's ready to go. It's a microcosm of the sound. The Corps of Engineers has issued the public notice. I believe the public comment period ended two weeks ago, and is scheduled to be dredged in the fall of 2016. Right now the western Long Island dump site is scheduled to be closed in the spring of 2016. We as a town have demonstrated to the Corps it's not feasible to go upland. There is no place to dump upland. So the only place to do it is in Long Island Sound. Now the Corps says they want to use the most economical ways to dredge in the river. We have \$3,000,000 to dredge in the river on bond from the State of Connecticut. The money is there, ready to go. If we can't dump it in western Long Island Sound, placing it at costing \$10,000,000. If we can't dump in western Long Island Sound we can't do the project. Thank you.
RESPONSE	Please see General Response to Availability of Open-Water Alternatives (0041R)
Ian McMillan, Greenwich CT Harbormaster	
COMMENT	I'm here representing an interest in Greenwich. We have a 6-foot anchorage, 8-foot anchorage. And in 2007 we had Hurricane Ernesto come by on a Labor Day weekend. It took out about 20 boats that could have gone downwind southerly and been hidden from the wind. That area was not available to because it had been filled in, with silt. It's a federal anchorage. We've lost 5 acres that has an impact. That's 270,000 cubic yards in that harbor displacing 110,000,000 gallons from two tides. We're missing 10 to 1 should we have a problem with our treatment plant.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
Louis Burch, Citizens Campaign for the Environment	
COMMENT	[E]xtend the public comment period to 120 days. The draft DMMP took over 10 years to complete, and yet stakeholders have only 60 days to complete written comments. Allowing for a longer public comment period will make for a better and more comprehensive document.
RESPONSE	Please see General Response to Public Involvement Process-NEPA (0003R)
COMMENT	The 2005 agreement between the states of New York and Connecticut as well as EPA was intended to phase out open water dumping with emphasis on beneficial reuse as an alternative. This draft DMMP is a business as usual attempt to continue using Long Island Sound as a dump for dredged material.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	Furthermore, the document focuses only on Long Island, instead of considering a regional approach. The document dismisses the use of confined facilities and reclaimed mine sites in Pennsylvania. As stated in the draft DMMP, these alternatives have large enough capacity to accommodate the dredging needs of Long Island Sound for the next 30 years, such as the New Haven breakwater site. The plan should not discount these options due to perceived lack of public interest.
RESPONSE	Please see General Response to Cost of Beneficial Use Alternatives (0076R)
COMMENT	Using dredged materials to restore beaches and coastal habitat is much more beneficial than open water disposal practices. We need a DMMP which prioritizes environmental impacts over cost.

RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	Open water dumping should only be considered if it can be proven it will not cause the degradation of water quality. DMMP and EIS fail to evaluate harmful pollutants such as nitrogen and phosphorus. Excess nitrogen is harmful to aquatic environments, however the document fails to, based on their disposal plan for more than 50,000,000 cubic yards of sediment, does not thoroughly assess the amount of nitrogen, and the effect on Long Island Sound and aquatic marine species.
RESPONSE	Please see General Response to Nitrogen Loading (0153R)
COMMENT	Finally, the draft DMMP is fundamentally flawed and ultimately fails to meet the mandate of the 2005 agreement between New York and Connecticut.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Jeff Freidag, CT	
COMMENT	Good evening. My name is Jeff Frye, lifelong resident of the State of Connecticut, and licensed captain in the U.S. Merchant Marine. I'm here to comment on the dredged material management plan. Navigable water, especially in the State of Connecticut, affects all aspects of the marine trades. The federal government is tasked with identifying the most economically and feasible cost of keeping the waters of the state navigable. We now have a scientifically backed plan for Long Island Sound, continued use of open water placement sites for which has been tested and is environmentally compatible following extensive testing.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	Closure of the open water disposal facilities in Long Island Sound will result in fewer maintained ports and harbors. In closing I have personally been involved in two dredge projects which underwent extensive testing prior to approval. Had the open water sites been closed, the economics of the project would have exceeded the feasibility. Both facilities would have been closed due to lack of usable depth. But now both facilities are open, offering recreation and economic activity to all.
RESPONSE	Please see General Response to Availability of Open-Water Alternatives (0041R)
Jack Brewer	
COMMENT	Jack Brewer, owner of some marinas in New York and Connecticut. I want to simply go on record as being in favor of the DMMP. You guys spent 10 years preparing a wonderful report. It's impressive. You've concluded without practical placement alternative dredging costs will continue to skyrocket. It cannot do harm to continue to look for better alternatives. I can assure you dredging permits of any kind are extremely difficult and expensive to obtain. The Corps, DEEP, and other agencies all require extensive permits.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)

COMMENT	Without dredging in an affordable manner, and it is extremely expensive, disposing in Long Island Sound, all ports; Bridgeport, Stamford, New London would shut down. Imagine the increase of truck traffic on I-95, the effect on hundreds of businesses in Connecticut in the marine field and their employees. In short, commerce and the economies in New York and Connecticut would be damaged tremendously if the dredging in Long Island Sound is stopped.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
Adrienne Esposito, Citizens Campaign for the Environment	
COMMENT	As you well know, the DMMP was mandated to phase out and reduce open water disposal. It doesn't do that. It doesn't achieve the mandate of the 2005 EPA ruling.
RESPONSE	Please see General Response to DMMP Goal to Eliminate or Reduce Open-Water Placement or Phase Out Open Water Placement (0042R)
COMMENT	One of the main reasons is because the crafters of the project didn't assign value to the ecological protection of the sound. When it came to dredged materials, you put cost as the main factor. I want to read for you exactly what that 2005 rule, the final rule recognizes that the use of practical alternatives may mean there will be additional cost. The final rule also states that the EPA defines as an alternative which is available at reasonable cost which need not be competitive with the cost of ocean dumping, taking into account the derived benefits.
RESPONSE	Please see General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R)
COMMENT	Let's take for instance the combined disposal facility. As you know, Norfolk, Virginia built one in the 1940s. It's looked upon today as how to deal with dredged materials for that region. 75 years ago they did that. That operation has been used for 75 years. We heard from experts in testimony today. Connecticut has a vast array of needs. We still have the same archaic plan which is dumping in Long Island Sound. This is not an expenditure of funds, but an investment of funds.
RESPONSE	The DMMP does not dismiss CDFs or any other alternative. The DMMP identifies a number of CDF opportunities in the LIS region, many of which have been the subject of prior studies over the past four decades. As the comment states, the DMMP does describe CDFs as requiring a significant public investment to implement, and as needing to be coordination between all levels of government, with long-term site management by a state agency or port authority. This is precisely how the large scale CDFs at Norfolk Harbor (Craney Island) and Chesapeake Bay (Poplar Island) were developed, built, managed and expanded over the years. In LIS non-Federal interests will need to advocate and sponsor the studies, design and ultimate construction of such facilities if any are ever to be developed. Until that interest and willingness to fund such regional alternatives develops, projects that would fill only a small portion of such facilities have nothing to consider. As with all the alternatives presented, the DMMP is a guide to the USACE, other agencies, the states and private dredging interests as to what alternatives could be considered.
COMMENT	I want to mention the issue of nitrogen loading in the sound. I met two weeks ago with New York officials embarking in a \$5,000,000 study on how to reduce nitrogen loading in estuaries. That study will be science-based and restrict nitrogen loading into the sound. How does this jive with that? There is no mention of nitrogen loading in the plan.
RESPONSE	Please see General Response to Nitrogen Loading (0153R)

COMMENT	Recognizing the need for reducing or eliminating open water disposal, those projects have been accomplished in a number of Connecticut harbors using near shore disposal of sandy material for beach nourishment. We hope the use can be expanded through the DMMP.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Geoff Steadman, Connecticut Harbor Management Association	
COMMENT	We [Connecticut Harbor Management Association] recognize there have been disputes about the science. 12 years ago it was suggested there be some sort of independent review, perhaps the National Body of Sciences, involving the Long Island Sound Congressional Caucus. I would also emphasize the importance of cooperation between the coastal management of New York and Connecticut. Historically there wasn't good coordination. We hope the DMMP will encourage that.
RESPONSE	See General Response to Agency and Stakeholder Coordination 0074R).
Holiday Inn, New London, CT - August 27, 2015	
Ayanti Grant, District Director, Congressman Joe Courtney (CT-2)	
COMMENT	<p>Good evening. My name is Ayanti Grant, and I serve as the District Director for Congressman Joe Courtney. Unfortunately, the Congressman couldn't be here this evening, but given his longstanding involvement with maritime issues and dredging issues, I am here to underscore his support for the DMMP. I do have a formal statement from the Congressman to submit for the record, however I will just summarize that Statement.</p> <p>During his time in Congress, Congressman Courtney and his office have worked closely with a range of stakeholders on the federal, state and local levels in addressing the critical issue of maintaining our ports, harbors and channels. Dredging and the disposal of dredged material is a constant challenge for southeastern Connecticut. Unfortunately, the lack of a clear framework for the disposal of dredged materials in the region as well as ongoing uncertainty over the future use of open water placement has had a negative impact on private marinas, ports, towns, even the sub base in this District. That's why Congressman Courtney feels that the Army Corps' DMMP plan is so important and deserves support.</p>
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	The DMMP identifies environmentally sound alternatives for the handling of dredged material such as beach nourishment and wetlands restoration as ways to reduce open water placement of dredged materials. However, as the DMMP notes, only a small portion of dredged materials can be used on land beneficially. To this end the DMMP retains open water placement as needed, appropriate and environmentally suitable option.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)

COMMENT	In addition to the critical goal of protecting the Long Island Sound, access to a range of dredged material options is absolutely vital to the economy of this District and the state. This region is host to a range of federal and military facilities dependent on the viability of accessible and cost-effective placement options. These include Connecticut-based facilities like the Naval Submarine Base in New London, the United States Coast Guard Academy, as well as Electric Boat. If this dredging strategy does not move forward, it is estimated that the region will see a 15 percent drop in navigation-dependent economic activity revenue in the next two decades and significant, perhaps even prohibitive increases in costs for the private, commercial and federal stakeholders. Without the DMMP and the continued access to open water placement sites contingent on its approval, Connecticut, particularly eastern Connecticut, will be negatively and disproportionately impacted.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	The DMMP is the result of years of research and planning and provides the Long Island Sound region with a balanced approach for future waterway maintenance projects. In short, the DMMP is a solid product that Congressman Courtney believes deserves support on both sides of the Sound. Thank you.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Paul Formica, CT State Representative (20th District)	
COMMENT	I stand and feel it is very important to support this Draft Management Plan this evening, and urge its acceptance.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	Dredging is an economic necessity in maintaining access to and from public waterways, harbors, rivers, coves and marinas. Navigation-dependent activity produces over nine billion dollars in economic output, five and a half billion dollars per year of the state's gross product, and over 55 thousand jobs and \$1.6 billion in federal and state tax revenue.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	<p>Open water disposal in most cases in geographical adjacent locations has been deemed with proper safeguards as the least costly with no quantifiable environmental damage. This meets both the federal base plan and the federal standard. State, municipal and private components should be afforded the same standard.</p> <p>Any discussion of environmental damage from the relocation material has not been quantified to an extent that you question the practice. Connecticut must protect access to its vast shoreline, small, mid and large ports, and CTDEEP is standing in support of this project.</p> <p>In conclusion, I would add that after a decade or nearly a decade of review, the Corps has concluded with the body of evidence available today, the safeguards of the present testing and evaluation requirements and continued monitoring of the sites and Sound, open water placement of materials deemed suitable for such is an environmentally acceptable practice and in most cases the most cost effective method.</p>
RESPONSE	Thank you for your support of the Long Island Sound DMMP.

Robert Ross, Connecticut Office of Military Affairs	
COMMENT	<p>The success of the Port Authority is contingent on the maintenance of our ports and harbors. Without a sustained effort to dredge channels and basins, the free flow of commerce at these ports and harbors is certain to be impeded. Yet the economic activity that the Port Authority is trying to foster is only part of the story. The benefits of dredging ports and harbors extend well beyond that activity of that kind of commerce. Commercial fishing, ferry-dependent tourism and recreational boating all have significant contributions to the economy. Further, the Submarine Base in New London depends on dredging to maintain access to its facilities. And the General Dynamics Electric Boat Shipyard relies on deepwater access for the construction and delivery of the submarines it constructs.</p> <p>Given the important economic and strategic benefits of maintaining access to Connecticut ports and harbors, the need to assure continued cost-effective and sufficient disposal options for dredged materials is paramount.</p>
RESPONSE	The DMMP recognizes the importance of cost-effective navigational dredging to the Connecticut's economy, its fishing, boating and tourist industry, as well as both the U.S. Navy's national defense mission, and the missions of the U.S. Coast Guard.
COMMENT	The DMMP gives us environmentally sound options for the disposal of dredged materials including the beneficial reuse of such materials for beach and marsh restoration.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Jefferson Harris, Vice Chairman, New London Port Authority	
COMMENT	The Dredged Material Management Plan is considered by the Port Authority to be vital interest for protecting the recreational, commercial, military and economic interests of our region.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Bonnie Reemsnyder, Town of Old Lyme, CT	
COMMENT	As a small community that is bordered by the Connecticut River and Long Island Sound, our economy really depends on marine interests. We are currently just getting ready to do a dredging project. As you can imagine for a small community, that would be very expensive for us without the assistance of the state and the added costs for a different plan really impacted that cost.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
COMMENT	So I am here to express my support for the DMMP and I will submit a further written statement to that effect.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Dawn Schieferdecker, Connecticut Marine Trade Association	
COMMENT	With continued diligence of testing, monitoring and innovative solutions, I believe the draft DMMP offers an acceptable balance to not only maintain Long Island Sound as the treasure we all know and love, but to actually improve it.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)

Robert Petzold, Petzold's Marine Center, CT	
COMMENT	My name is Robert Petzold. I just want to state for the record, that I've submitted written testimony in support of the DMMP.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Shannon McKenzie, Mystic Seaport, CT	
COMMENT	The seaport plans to submit written testimony in support of the Dredged Material Management Plan.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
John Johnson, Connecticut Marine Trade Association	
COMMENT	Good evening. Thank you very much for the opportunity to comment on the ten-year project with a cost of 15 million dollars to all of us. I think it is fair to say that all of us from Connecticut Marine Trades Association of which I am vice chairman are in full support of the plan as presented. I think that the biggest objection, obviously is that you have allowed or have opined that open water disposal is acceptable under certain circumstances. I think the environmental community feels that should be prohibited. And as an economic factor, that just cannot happen. \$30 a yard is an insane amount of money to pay. It is even more ridiculous when you project a hundred dollars a yard to take it to open water sites.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	I think that it is important that everybody realize that at the end of this process that a no action program or no action stance will be disastrous for the marine industry and the maritime industry here in Connecticut.
RESPONSE	Please see General Response to Dredging Economy (0006R).
COMMENT	I would urge the Corps and EPA in Washington to please take a stance on this study and enact legislation that would support your recommendations.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Keith Nelson, CT	
COMMENT	I am speaking in favor of adopting this study. And thank you for the detailed effort that you put into it. I am representing a number of small dredging projects in southeastern Connecticut region. And open water disposal is vital to the survival of many of these small marinas. And I will be submitting more detailed comments in favor of the adoption of the
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)

William Spicer, Spicer's Marina, Noank, CT	
COMMENT	Please note that the vicinity is not in Long Island Sound. Long Island Sound is under the MPRSA Ocean Dumping Act and vicinity. It is not, although we are going to work with "and vicinity" as we move forward. At page 3-3 in the middle of the page, Long Island Sound has outlets at both ends, at the Race in the east, and through the East River in the west. At page 5-331, middle of the page, also included Plum Island and Gull Islands which separates Long Island Sound from Block Island Sound.
RESPONSE	Please see Public Involvement Appendix A, Part 3, for the EPA memorandum of May 12, 2009 on the "Eastern Boundary of Long Island Sound for Purposes of Section 106(f) of the MPRSA".
COMMENT	Block Island Sound and Fishers Island Sound remain 404 waters governed by the appropriate Estuary Clean Water Act. We should note a little further down Block Island Sound, Gardiners Bay, the Race, Fishers Island Sound and New London Harbor are not part of Long Island Sound. Therefore, they are under 404 rules. And I certainly don't want to see MPRSA extended. 404 works for 48 states, Clean Water Act.
RESPONSE	The States of New York and Connecticut and the Federal government have regulatory authority over dredging and placement of dredged material. In order to be considered for placement of dredged material into a marine environment, the dredged material must undergo rigorous testing that indicates that the dredged material is suitable for placement at a marine site. There is no regulatory prohibition of placement of dredged material in a marine environment but rather the requirement to seek and receive approval from the appropriate regulatory agencies for that placement. All of the regulatory agencies that oversee Long Island Sound have procedures in place that would allow for the placement of dredged material in a marine environment.
Kathleen Burns, Connecticut Marine Trade Association	
COMMENT	For the ten years that this plan has been in development, continued dredging has been done throughout Long Island Sound. Rigorous testing for every individual project has been done to determine suitability for many placement alternatives, and this plan outlines the framework for those future decisions. We support the Corps' efforts and urge the continued use of practical science, sound decision-making and cost effective choices, that these remain intact for the future of navigation access.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	I had the opportunity to attend this hearing in Port Jefferson on Monday evening. And it was with great passion that the 21 speakers addressed this panel with colorful language of toxins and contaminants and blatantly criticizing the industrial waters of Connecticut, that this was a Connecticut problem. The fact is Connecticut's geography is simply different than that of the north shore of New York. And this area must be periodically dredged to maintain access. There's simply no alternative to dredging this area.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
COMMENT	Interestingly enough in 2009, a federal navigation project here in Connecticut provided clean cap material for a New York town that was in dire dredging need. This is what the cooperation on Long Island Sound should look like.

RESPONSE	Yes, the DMMP concludes that implementation of beneficial use alternatives such as the capping project described in the comment, will require close coordination between the states dredging proponents, and beneficial use proponents on both sides of the Sound. This type of partnership will be key to meeting the DMMP goal of reducing, where practicable, reliance on open-water placement in the future.
COMMENT	I personally have been through dredging projects. I have been through the costly testing, permitting, capping and none of this is easy, and none of this is done randomly. And any other comments to the contrary is simply inaccurate. Now is the time, however, with this plan to act. No action is simply not an alternative we can afford.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
COMMENT	Access to open water disposal with proper oversight is a practicable alternative that you have shown in this report. Existing open water disposal locations, all consistently monitored under DAMOS since 1977 must remain open and usable. Reasonable proximity to the geographical areas in need of dredging cited in this plan must be maintained. We believe that you have identified the needs of our future and provided reasonable and thoughtful alternatives to satisfy our future navigation needs while protecting this beautiful home we call Long Island Sound.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Stephen McKenzie, Southeastern Connecticut Enterprise Region (SECTER)	
COMMENT	I am appearing today on behalf of the Southeastern Connecticut Enterprise Region Corporations to support the draft plan released on August 17, 2015.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	In addition to the critical goal of protecting the Long Island Sound, access to a range of dredged material placement options is absolutely vital to our regional and state economies. According to the DMMP economic activities that utilize Long Island Sound waterways contribute more than \$9 billion annually in economic output. They support more than 55,000 jobs in the Long Island Sound region, 40,000 of which are in Connecticut.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
COMMENT	[O]ur region is dependent on a range of federal and military facilities, such as the sub base in New London, that has been mentioned by some previous speaker, and dependent on the viability of accessible and cost-effective placement options. If this dredging plan does not move forward, it's estimated without action the region will see a 15 percent dip in navigation-dependent economic activity revenue in the next two decades, and significant and perhaps prohibitive increases in costs for the private, commercial and federal stakeholders.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)

COMMENT	Thus we applaud the Army Corps for identifying new environmentally sound alternatives for the handling of dredging materials such as beach nourishment and wetlands restoration. In Connecticut, dredged materials have not only been used for shoreline replenishment, but also for capping landfills and brownfields sites upland. Knowing that only a small portion of dredged materials can be used on land beneficially, we also understand that the continued need for open water disposal options currently in use in Connecticut waters and support continuing this disposal method for fine grained materials suitable for open water placement.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	We look forward to the timely approval of the DMMP and continued constructive engagement with stakeholders across the Long Island Sound region on managing dredging needs in the future.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Douglas Domenie, Brewer Yacht Yard Group	
COMMENT	I am with the Brewer Yacht Yard Group. We represent approximately 3,000 boat owners as customers in the Connecticut and the New York waters. We are in support of the DMMP. We every day fight the siltation and reduction of berths in our properties from siltation that occurs from far beyond our control. Dredging is imperative to our sustainability and our continued success. Thank you. We will support further.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Linda Kowalski, The Kowalski Group	
COMMENT	I submitted my comment by writing in support of the plan.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)

Peter Alexander	
COMMENT	I really do appreciate that we are recognizing that the system is broken, that people have different opinions and I'm dazzled by the amount of research that has gone into this. I want to really fess up and say I think my profession, including me, has let us all down. Without real watershed planning, without taking the silt and doing something with it before it gets into the harbors, we would all be a lot better off. From an environmental point of view, the shallower the harbors the warmer the water. The warmer the water, the more adverse effects we have. Instead of just talking about it -- I have been working on a study for almost 15 years regarding the Sound itself. We have a pilot project that is down in the Greenwich area. And I am happy to submit a copy of it for the record. And I would take probably more than three minutes to make sure my USB with me would be hooked up to your system, but I do have a PowerPoint available. I would be happy to share that with any and all that would like to get it. I really am excited. Thank you so much for these efforts. We really shouldn't just be arguing where we are going to put this stuff, but how to keep it from repeating. And as this pilot project shows, I believe that we really can have storm protection as well as increasing the viability of the environment by replacing and putting in other areas the drastic amount of salt marsh that has been eliminated. That is part of the problem. Let's get those back and we will all be happier.
RESPONSE	Thank you. Your comment has been noted.
Abbie McAllister, Saybrook Point Inn and Spa Marina	
COMMENT	My marina [Saybrook Point, Inn and Spa Marina] has to dredge every two to three years, otherwise we will be inundated. I'm just one small entity, but because of the marina at Saybrook Point, we employ 257 people in the summer. If we can't continue this, tens of thousands of dollars of tourism dollars will no longer be coming into our area. All those jobs will be lost.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
COMMENT	I think we really need to support this. If there was any way that Saybrook Point could find another alternative that was viable for disposing of this material, we certainly would. We are one of Connecticut's most sensitive, environmentally sensitive properties. We received the Silver Screen Award every year since its institution. We have been recognized by the State DEEP for our efforts. We certainly feel that we are doing what is most environmentally sensitive. If we are not there at the marina, the sediment that is coming into our marina is just going to continue on to Cornfield Shoals anyway. What is -- I am not sure what the problem is with continuing to use Cornfield Shoals especially since the DMMP has shown that it is a viable option.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)

Lynne Bonnett, New Haven, CT (Morris Cove)	
COMMENT	So there is a huge variation in suitability. So New Haven dredging is suitable for open disposal in Long Island Sound. But I think it's probably very different from suitable material from Branford or some cleaner sites. So when you're considering beneficial use of suitable materials, for example, putting it on a beach and putting it in a marsh or somewhere in a river, harbor area which is not federally regulated, how are you going to determine or how can we in New Haven be assured that the dredging material that comes out of New Haven Harbor that is, quote-unquote, suitable is not then spread on Lighthouse Beach or Sandy Point or other areas which are used by the public?
RESPONSE	The States of New York and Connecticut and the Federal government have regulatory authority over dredging and placement of dredged material. In order to be considered for placement of dredged material into a marine environment, the dredged material must undergo rigorous testing that indicates that the dredged material is suitable for placement at a marine site. There is no regulatory prohibition of placement of dredged material in a marine environment but rather the requirement to seek and receive approval from the appropriate regulatory agencies for that placement. All of the regulatory agencies that oversee Long Island Sound have procedures in place that would allow for the placement of dredged material in a marine environment.
COMMENT	We have a diverse population. People fish in that harbor to feed their families. Five years ago, I went to an engineer with this problem in the East Shore neighborhood. We said there is freshwater and the ground water is very high where we live and our basements flood. You are going to put contaminated material which would communicate with what's in that pit. So, nowhere in this process moving towards beneficial use, which I support, have I seen a consideration for what the people that live in the area think or want or what is beneficial for them.
RESPONSE	In response to the many comments received from the public and agencies on the use of the Morris Cove Borrow Pit as a CAD cell, the section of the DMMP in Chapter 4 (Section 4.9.8) describing Morris Cove and its potential use has been expanded to include additional information on CAD cell technology and on the Morris Cove site in particular.
COMMENT	New Haven has a power plant, a sewage sludge incinerator that imports sludge from all over the place. The stuff that comes down the river is polluted. It is the biggest deepwater port. The stuff that comes in the harbor is polluted. We wouldn't have a port without dredging. I am not against dredging. I need clarity on what this beneficial use will mean for our communities. Is it going to concentrate more pollution where we live or is it going to help us out? And I am interested in that bindery that New Jersey was using. That would be perfect for us in terms of taking dredged material that is polluted and binding it in concrete, using it for road construction.
RESPONSE	Before any dredged material can be placed at an open-water site, rigorous physical, chemical, and biological testing must be performed. This testing ensures that the placement of dredged material in the sound will not have an environmental impact on the sound's ecology. These test results must be reviewed for each project independently by US EPA and the state regulatory agencies before placement can be approved. Dredged material which fails these test may not be placed in the open waters of the sound and must be confined by some other method. Silty material - a very common product of dredging, particularly unsuitable material - may be used for marsh creation, but has limited beneficial use options because it usually is not compatible with beach nourishment, is not an appropriate construction material, including as an additive to concrete, and has a salt content too high for landscaping.

Bill Heiple	
COMMENT	For the record, Bill Heiple. I am an engineer. I'm not representing anyone in particular. On behalf of the oil terminal clients and other clients I have had, thank you for doing the detailed analysis that we have had to undertake in the past by ourselves. I will be submitting written comments in support of the DMMP.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Christian McGugan, Glenmore Marina, CT	
COMMENT	I am an owner at Glenmore Marina and we have a marina construction company, Glenmore Marina Contracting. That we operate out of our family-owned marina. I am a member of the Connecticut Marine Trade Association and the Connecticut Maritime Coalition, and I strongly support the DMMP. I want to thank you guys and the EPA for undertaking this and spending millions of dollars over many years to do your due diligence which is what you've done. You compiled facts, studies to prove pretty much that this is the most -- it is a safe and viable environment option. The other side of that I heard, it is a feasible option. I think to most people feasible means financially feasible. It has to be financially feasible.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	I think that feasibility definitely equals how financially feasible it is for people. The dredged alternatives, I witnessed them, I participated in them. They can be tough for the smaller projects. You almost don't want the sandy material because you can't take it to the disposal area, they want you to take it to a beach that is twice as far away. You end up paying more to get rid of this stuff. So, that is a small problem.
RESPONSE	The DMMP identified beach and nearshore bar/berm placement sites in every dredging center around LIS. This should ensure that in the future, sandy material can use sites that are at least as close to each harbor as the open water sites. This should make beneficial use of sand for nourishment purposes more cost effectively, even for smaller non-Federal projects.
COMMENT	I've been to several of these now. And I just wanted to sort of point out and for the record, for people listening. I know there's a lot of supporters of the DMMP here. There is opposition to this. I have been to several of these informationals. I think you guys have done your due diligence. I know the EPA has. They are getting ready to assign another site here in New London. So, what I'm hearing and what I want to suggest to people listening are the opponents, who I won't name, listen to what they are saying and listen closely because I have. And I actually printed out some minutes of meetings that I have been to where the opponents of DMMP and offshore disposal, they blame the lobster shell disease in Long Island Sound on dredging with no facts or data to back it up. They claim that the hazards of navigation in Long Island Sound. Again, I am happy to produce this for anyone in this room. It is just the minutes from the meetings. I know because I have been out there in the wintertime in February. The navigation is not too tough. They claim -- there's many other forms of environmental damage that they claim with no facts, data or research.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)

Robert Ferrara, Mason Island Landing, CT	
COMMENT	I represent Mason Island Landing doing business as Mystic Point Marina which is located just north of the causeway bridge on Mason Island on the east side of the island. The causeway bridge causes some additional problems because it only has a small opening and silt has built up over the years. We are a small family business like so many other marinas. Some in the family 70-80 years. My wife runs the marina and my brother Lawrence and I own the marina. We have 120 slips. Way too many of those slips are empty. Now, I could blame my wife for poor management job, but that wouldn't be wise. I think this has something to do with it, the slips very low tide is above water. I think that might have something to do with it, I think. It is an urgent problem. We have 13,000 cubic yards to dispose of. The marina is just about breaking even. So, when you double or triple the cost, you are talking about a half a million dollars, \$600,000. When you're breaking even, it is just not viable. Time is of the essence and it really is an urgent problem.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
Ron Helbig, CT	
COMMENT	I stand before you in support of the DMMP. My family owns three marine facilities, boatyards out of Mystic River. The youngest one 150 years young, and the oldest one dating back to 1843. We just underwent the Mystic River being dredged, a very successful dredging. These facilities would not be around if there wasn't open-water disposal for our dredged materials. It was really nice to see Ms. Pala's report showing how much of the disposal for Mystic River was 100 percent, got a rating of a hundred for disposability, suitability. And a very good example of how something -- a process can benefit so many people.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	Long Island Sound is a very busy estuary with a lot of boats going into and from, but all tributaries that lead into it, all the little coves, that is where the boats are typically going. They are not just through the middle of the Sound. These areas need to be protected as you well know.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
Cindy Karlson, CT	
COMMENT	I practice environmental law now for almost two decades and have substantial experience in natural resource damage and restoration, specifically with coastal projects. I support the DMMP and will provide written comments enumerating reasons in favor of such.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	No action is not an acceptable alternative.
RESPONSE	Please see General Response to Dredging Economy (0006R).

Stephen Karlson, CT	
COMMENT	I will also submit written correspondence supporting the plan.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	I am here representing three marinas in Connecticut. Two of them we have significant dredged needs coming forth. I just want to highlight the reality is we didn't create the problems. One of the marinas after Super Storm Sandy and Irene, we lost about two feet of dredged in our lift well as well as in the fairway to the lift well. Our dedicated employees actually hauled those at night, sometimes depending on the tide to get the boats in and out. It's an economic problem that affects the entire shoreline, especially here in Connecticut.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
COMMENT	Currently we had to rechange our dredged plans to go to central Long Island instead of the eastern Long Island location. The New London site was not available. It cost us twice as much money to move that material to central Long Island. It is an economic problem affecting many of the marinas in this area.
RESPONSE	Please see General Response to Availability of Open-Water Alternatives (0041R)
Linda Kowalski, The Kowalski Group	
COMMENT	I worked closely with recreational boaters and marina principals on Long Island Sound issues. Solid people live here and are environmentally responsible. They love the sound and want to protect and preserve it like everyone else. These are the stewards of the sound; small businesses, marinas, ship builders and repairers in the community. Several have had businesses for two or three generations. If open water disposal is not allowed, the cost of dredging will skyrocket, will not be economically feasible.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
COMMENT	Let me quote a bit from the DEEP commissioner last night in Stamford, "Our experience over the past 30 years and all data that has been generated shows open water disposal to be an environmentally acceptable practice. The evidence clearly shows that through careful oversight and management open water placement has not diminished water quality, natural resources, aquatic life, or public health in Connecticut or neighboring states." Commissioner Klee has tremendous credibility, and I believe his words are worth serious consideration.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	I commend you for the work you've done on this draft plan. Open water disposal in controlled circumstances is suitable for the vast majority of dredging problems. Opponents of open water disposal have a burden of proof to meet here when it comes to the science. Emotion is not enough. We need specific data from them as to why the practice should not occur. We all want to protect Long Island Sound and have it be navigable, want it to be free and clear of contaminants. The two are not mutually exclusive.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)

Hotel Indigo, Riverhead, NY - September 16, 2015	
Steven Englebright, NY State Assembly, Committee on Environmental Conservation	
COMMENT	That message in part is we are here this evening in opposition to the continued open water dumping of dredged material in the Long Island Sound, and urge rejection of the Army Corps of Engineers draft Dredged Material Management Plan.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	<p>We acknowledge the necessity of dredging and support the maintenance of harbors, bays, and channels for safe and efficient navigation for commercial and recreational purposes. However, in light of the mandate that compelled its creation, the DMMP's continued reliance on open-water placement of dredged material is troubling.</p> <p>The 2004 Objection to Consistency Determination issued by the New York Department of State found, quote, "Long Island Sound is one of the most productive estuarine waters in the world. It provides valuable breeding, nesting and feeding habitats for myriad aquatic, avian, and animal species, and provides commercial fishing, tourism, and recreational benefits to the communities along its shoreline.</p> <p>"The Long Island Sound region is also one of the most densely populated areas in North America, more than 8.4 million people live in the Sound's watershed. And the Sound is used for water-dependent industries, recreational boating, commercial and recreational fishing and shellfishing, and recreational beach-going. It is one of New York's most valuable natural resources. For these reasons the cleanliness of the Long Island Sound is of paramount importance."</p>
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	The condition of the settlement was the development of the Long Island DMMP with an emphasis on beneficial uses of dredge materials and other alternatives to open-water disposal. The plan was mandated by New York and Connecticut to be a comprehensive plan to phase out open-water disposal of dredged material and establish future protocols for dredged material management. Instead, the draft DMMP appears to be along the lines of the same open-water dredged dumping plan that we have seen in the past.
RESPONSE	Please see General Response to DMMP Goal to Eliminate or Reduce Open-Water Placement or Phase Out Open Water Placement (0042R)
COMMENT	In conclusion, the water quality of the Long Island Sound directly impacts the millions of people that live along the shores, as well as avian and marine species who live in or pass through it. Issues that directly impact the water quality, such as open-water management of dredged materials, need a thorough analysis and problem-solving that lead to tangible results.
RESPONSE	The USACE agrees with your comment.
COMMENT	The LIS DMMP is just the newest version, it seems, of out-of-sight, out-of-mind method of waste disposal that has been with us since the dawn of industrial revolution.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.

Al Krupski, Suffolk County Legislature	
COMMENT	So in the Suffolk County Legislature led by Presiding Officer DuWayne Gregory, we wrote a letter to object to this, and they all signed it and they have objected to it.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	The cost of the project, that is one of the things that when you consider the cost, I don't think you consider the value of the natural assets it is going to impact. You have centuries of the waste from New England's industrial age that have been dumped into the estuaries and reside now in the mineral, the organic sediment, and when all of that is disbursed in the Long Island Sound, I don't think you considered the actual impact it will have on the environment.
RESPONSE	Please see General Response to Environmental Degradation/Consequences and Economic Cost of Open-Water Placement (0002R)
COMMENT	I represent people who live off Cornfield Shoals, the dump site off of Orient or the Fishers Island dump sites. Another thing that was highlighted here is how this is going to be studied after the dumping is done, and then we will find out if it had any impact. I think if you don't dump contaminated material, there is no need for taxpayers to pay for the study of the impact areas.
RESPONSE	Please see General Response to Sediment Contamination (0005R).
COMMENT	The cartoon drawing that you had up there that showed the material being deposited on the seabed from a barge was so unrealistic; if you have any working knowledge of that area and how fast the water moves through the Race -- that's why it's called the Race -- and Plum Gut because there is no much water that flows through it, it is going to disburse that material throughout the whole estuary depending on the tide cycle.
RESPONSE	Please see General Response to Placing of Dredged Material in the Aquatic Environment, Resuspension and Migration of Sediment (0154R)
COMMENT	If the sediment is coarse and compatible, and clean of contamination, it should certainly be used as beach nourishment. That is something that the Army Corps should know at this point. So another thing that had been addressed is the developing alternative uses, but if you take the lazy and cheap way out of dumping the dredged material in open water, alternatives uses will never be developed because no one will have any interest in them.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	So another thing that had been addressed is the developing alternative uses, but if you take the lazy and cheap way out of dumping the dredged material in open water, alternatives uses will never be developed because no one will have any interest in them.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	You are still selling this bad plan after many meetings and many presentations. And you changed this one up from the last one.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.

COMMENT	Once you are considering the cost of the project, you are not considering at all the value of the natural resources that will be impacted.
RESPONSE	Please see General Response to Environmental Degradation/Consequences and Economic Cost of Open-Water Placement (0002R)
Ed Romaine, Town of Brookhaven	
COMMENT	<p>We think the plan does not achieve the goals that it was given ten years ago by the Governor of New York and the Governor of Connecticut, which was to lessen the Sound dumping. It's not good for the Sound.</p> <p>My understanding is that over the next 30 years this plan proposes to dump 53 million cubic yards of dredged spoils, which will reduce the amount of open-water dumping by exactly four percent. This plan fails in its objective. The objective originally in undertaking this plan at a cost of 7 million dollars, that was due eight years ago and twice delayed, was to prevent or limit the amount of open-water dredging. The plan does not achieve its goal.</p>
RESPONSE	Please see General Response to DMMP Goal to Eliminate or Reduce Open-Water Placement or Phase Out Open Water Placement (0042R)
COMMENT	Are there any quantitative reductions in the amount of dredged spoils being dumped in the Sound? Not really.
RESPONSE	Please see the General Response to Eliminate or Phase Out Open-Water Placement (0042R).
COMMENT	How much has occurred in terms of prevention of sediment from filling the harbors and basins that you are dredging? Very little. Connecticut has not invested in anything that would prevent those sediments from forming again.
RESPONSE	Please see the General Response to Sediment Reduction Efforts (0009R)
COMMENT	Does the plan comply with the Clean Water Act and the Ocean Dumping Act? Barely.
RESPONSE	The States of New York and Connecticut and the Federal government have regulatory authority over dredging and placement of dredged material. In order to be considered for placement of dredged material into a marine environment, the dredged material must undergo rigorous testing that indicates that the dredged material is suitable for placement at an marine site. There is no regulatory prohibition of placement of dredged material in a marine environment but rather the requirement to seek and receive approval from the appropriate regulatory agencies for that placement. All of the regulatory agencies that oversee Long Island Sound have procedures in place that would allow for the placement of dredged material in a marine environment.
COMMENT	Does the Army Corps of Engineers request any funding through this plan to help them reduce or eliminate open water disposal? Not really. They don't request any dumping.
RESPONSE	Please see the General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R)
COMMENT	They haven't seriously considered alternatives, beach nourishment, wetlands restoration, landfill capping, a whole host of the other things that could be done in terms of upland disposal. Instead, they have opted for dumping in open water because it is the cheapest way.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)

COMMENT	I think there is a lot of problems with this plan. I would urge you to go back to the drawing board.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
Bill Toedter, North Fork Environmental Council	
COMMENT	<p>We need your best solutions, not the least-cost options. Now, if you look at costs, you need to cost out not just today's actions, but what those actions may cost in the future. Your charge was to phase out the dumping of dredged spoils in Long Island Sound, to provide us with options for reuse or disposal of dredged spoils -- the best options, not the least-costly today.</p> <p>We are fighting for clean water, for improved health of Long Island Sound, and the animals and fish which live in and around it, for the jobs, the industries, the economy which depends on clean water, as well as the health of the ecosystem, the animals, and the health of the people that eat those fish and shellfish. We have been fighting this war for decades. We need your help. We need your best. While we are at war, you don't ask if you can afford that bridge, that bomb, that sortie -- you do what needs to be done.</p> <p>If the US Army Corps delivers the best plan and options regardless of cost, we will stand with you shoulder to shoulder to fight to get the funding you need to get the job right. You will be proud of how hard and how well we can fight.</p>
RESPONSE	Please see the General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R)
COMMENT	Please help us by putting this draft DMMP aside. It is not your best. Go back to the drawing table and give us your best. Help us to protect Long Island Sound.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
George Hoffman, Setauket Harbor Task Force	
COMMENT	<p>When I saw the plan was coming out, we took an open-minded approach to it. I think the science seemed to be pretty valid in terms of looking at the Army Corps' projects and breaking down the ingredients in the dredged spoils. But when I went to the Port Jefferson meeting that you had at the beginning of this project, we learned about the cost benefit analysis which unfortunately just seems to shoehorn everything into a decision that says open water disposal is always going to be the Federal base plan.</p> <p>I think that is unfortunate. We were hoping for more in this plan. I agree with the speaker that just spoke before. I think we have to start looking at beneficial use. I think it is really critical we move in that direction.</p>
RESPONSE	Please see the General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R)
COMMENT	I would hope that you guys go back and maybe give a different value to the beneficial use I think that is critical to what we are doing.
RESPONSE	Please see the General Response to Benefits of and Value Assigned to Beneficial Use Alternatives (0084R)
COMMENT	We are starting to clean up the Long Island Sound. We need partners. We need Federal partners, and we hope the Army Corps could be that partner.
RESPONSE	Please see the General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R), and the General Response to Adequacy of Agency and Stakeholder Coordination (0074R)

COMMENT	I would ask you to go back and maybe revalue the beneficial use as opposed to open water disposal.
RESPONSE	The economic, societal, and environmental impacts of beneficial use projects for dredged material are measured as the benefit of using the material in those manners, as compared to the incremental cost of implementing such projects in excess of the costs that would occur with the Federal Base Plan, if that is different. Beneficial uses are warranted and justified only if the incremental cost of their design, construction and future maintenance is outweighed by their beneficial impacts. Allocating the benefits of beneficial use alternatives as costs to other plans would be an inappropriate comparison of their relative merits. The benefits of any specific beneficial use alternative can only be determined when evaluated as a placement option for a particular dredging project at the time the project is funded for implementation. Each dredging project and each beneficial use alternative must be evaluated specifically and separately including the willingness of non-Federal partners to participate financially in each proposed project.
Michael Osinski, Long Island Oyster Growers Association	
COMMENT	I'm with the Long Island Oyster Growers Association, and we have concerns about the spoil material being put in Fishers Island Sound, or the leaching over to Fishers Island Sound. There are oyster farms there, and there are more and more oyster farms now, and, you know, there's oyster farms everywhere now. Also there are clambers, and they are dredging in that area. It's not a farm product, but it's a wild set.
RESPONSE	With the nearly 40 year record of DAMOS surveys, there have been multiple opportunities to evaluate the passage of large storms (both hurricanes and nor'easters) on the dredged material deposits on the seafloor. As discussed in Section 4.4.1 of the PEIS, these investigations have demonstrated long-term stability of the deposits even at the most exposed energy sites.
COMMENT	So, if this dredge material can be moved out in the Atlantic Ocean, that would be -- you know, if it's on a boat, take it 100 miles out in the ocean. We don't need it in the Sound. There's a lot of shellfish coming out of the Sound, and we are feeding everybody in the city, and we want to continue to do that. But, in general, the Army Corps has always been helpful to everybody for our permits. We don't want to come across as if we're criticizing the Army Corps, but we're just trying to get our input as to this material. Move it out a hundred miles offshore.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	I'm particularly concerned about our fellow growers and Fishers Island and Orient. They are close to the dump site. Like Mr. Toedter said earlier, when you dump something -- I dump stuff in the water everyday. It doesn't go down in a funnel like the picture, it does just the opposite. The picture you drew is misrepresentative of what actually occurs: The stuff goes all over the place.
RESPONSE	Please see General Response to Placing of Dredged Material in the Aquatic Environment, Resuspension and Migration of Sediment (0154R)
COMMENT	Those poor guys in Fishers Island and Orient, we are out there every day. We take our kids out there to work. We are working every day. Don't want the spoils from dirty harbors in our water.

RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	I notice the potential dump sites that you had on your list, not one dump site was a farm that is growing potatoes or vegetables or apples, but you are going to dump it right next to an oyster farm because you can't see underneath the water. We have animals growing there that we use to feed people. If you don't consider dumping it on top the farms that grow vegetables and peaches, and whatever, why are you dumping it right next to oyster farms where we are growing stuff? Think about it. You don't even consider that.
RESPONSE	Open water disposal sites are designated in areas with the least potential for impacts. Extensive surveys to document baseline conditions of biological, chemical, and physical conditions are performed before designation is made.
Jeremy Samuelson, Concerned Citizens of Montauk	
COMMENT	<p>I represent the Concerned Citizens of Montauk. We are an environmental nonprofit representing over 1,200 families, individuals, and business owners in Montauk. I'm troubled by the phrase "historically consistent" that was offered by the Colonel earlier as one of the many justifications for why this plan is okay. Just because we have made a mistake in the past, that should not be our justification for repeating that mistake going forward.</p> <p>In fact, we have avoided making this mistake in the past. The real history of this project is that ten years ago two Governors came together and signed a letter directing the Federal agencies involved here to go back and try again. The phrases they used were "reduce or eliminate open-water dumping." Unfortunately, what is being put on the table today does not represent a substandard change to that original proposal. It continues exactly the same elements that are objectionable under the prior plan.</p>
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	In fact, it increases the volume of material here, up to between 50 and 100 percent to be dumped in the Sound, and it extends the calendar from 20 years to 30 years. So far from representing a reduction or elimination of the offending elements of the prior plan, this is doubling down and extending the calendar on a failed plan.
RESPONSE	Please see the General Response to DMMP Goal to Eliminate or Reduce Open-Water Placement or Phase Out Open Water Placement (0042R)
COMMENT	How is it that this is the preferred alternative? It gets us back to the term "least cost." This is as several other speakers have remarked only the least cost alternative if we exclude the cost of the impacts to critical, natural, economic, and recreation resources . We have spent as a nation billions -- with a B -- billions of dollars cleaning up Long Island Sound. This is one of 28 federally protected national estuaries. We have spent billions of dollars cleaning up this exact water body. And now for want of a few million dollars extra to do the right thing on the disposal side of the equation, we are going to roll back the gains that we have already made.
RESPONSE	Please see the General Response to Environmental Degradation/Consequences and Economic Cost of Open-Water Placement (0002R)

COMMENT	The solution is not contained in the plan that you have before you. It is not to repeat the mistakes of the past. It is simply to go back to the Federal agencies involved here, and to secure an adequate budget that allows disposal that is truly to use your terms and your tests "environmentally acceptable." The plan on the table before you fails in one critical regard: It is not environmentally acceptable. That is the standard to which you must rise in order to have this plan pass muster. This plan is not environmentally acceptable.
RESPONSE	The USACE stresses that for the DMMP to be successful in moving forward and achieving the goal of reducing, where practicable, the reliance on open-water disposal in LIS, that all agencies including state participants in the RDT must cooperatively approach the issues of funding and implementing beneficial uses and other alternatives to open-water placement. This effort cannot succeed without the sustained cooperation of the states involved.
Kevin McAllister, Defend H2O	
COMMENT	I want to speak to the dredge sites. These are predominantly industrial sites, major runoff industrial use. The river mouth basically in Bridgeport and New London, I would argue these are sinks for substantial contaminants, pesticides, DOTs, hydrocarbons. The list goes on relative to the areas. I see that you are representing six percent as unsuitable based on toxicity. I question that. These are not static systems; these are fluid systems with respect to changes. So as much as perhaps your analyses state, number one, I would argue it is probably deficient relative to the sampling, and I would also argue that it will change with time. Things happen; new sources come in.
RESPONSE	Please see the General Response to Sediment Contamination and Dredged Material Sampling and Testing (0005R)
COMMENT	Relative to the disposal areas, I attended an EPA meeting in December and a great deal of length went into suggesting that strategically that the dump sites would be like dropping a rock from your hip. It is going to land at your feet and very little dispersal [dispersal]. You heard Legislator Krupski speak about the Race. These are highly turbulent fluid areas; we are dealing with 65 percent silt. The notion that that is staying in place quite frankly is nonsensical on the biological sense. Without question there will be dispersal [dispersal].
RESPONSE	Please see General Response to Placing of Dredged Material in the Aquatic Environment, Resuspension and Migration of Sediment (0154R)
COMMENT	You couple the toxicity of these sediments, the fine grain size, the silt unto themselves purely without toxicity in them are pollutants. You are talking height and prolonged turbidity level, suppressed DO level, the toxicity moving through the food chain.
RESPONSE	Please see the General Response to Environmental Degradation/Consequences and Economic Cost of Open-Water Placement (0002R)
COMMENT	There are serious implications to this plan progressing. I attended Port Jefferson ten years ago approximately. I was at that meeting with the EPA when ultimately setting in motion basically a new direction here. Quite frankly, this is like Ground Hog Day; you are back to the same old same old.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	I was taken aback by the Federal base plan. I have been very critical in public speaking on this, that the Corps is quite frankly cheaping this out. Ultimately after hearing Federal base plan least cost, in a way that substantiates it.

RESPONSE	Please see the General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R)
COMMENT	I know you have identified the beneficial use options, but we are not really exploring that. This is ultimately a continuation of degradation of the Long Island Sound.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	And lastly, with the estuary of national significance -- and I would surmise we are probably looking at billions of dollars pouring in by both states to try to clean up Long Island Sound, this flies in the face of those efforts. So please step back and revisit this plan.
RESPONSE	Please see the General Response to Long Island Sound as an Estuary of National Significance (0015R)
Adrienne Esposito, Citizens Campaign for the Environment	
COMMENT	I'm going to submit to you this evening a letter from 25 different stakeholder organizations from one end of Long Island to the other opposing this plan. You remember that New York State rejected the first plan. That is how we got into this situation in the first place. That is why then Governor Rowland of Connecticut, Governor Pataki of New York, the EPA mandated the Army Corps to go back to the drawing board and come up with a plan that would phase out open-water disposal in place of beneficial reuse. With all due respect what the hell happened? Here we are ten years later and we have a plan saying open water-disposal is environmentally benign. Instead of ten years ago if you had a plan that said 20 million cubic yards would be disposed in two sites over 20 years, now we have a plan that says 30 to 50 million cubic yards of waste will be disposed in four sites over 30 years. It is on the same bad premise; it is a bigger, badder plan. How do you think New York is going to say this is good, it's okay, let's go forward. I don't understand what happened here. We have the same thing.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	You come to New York, 20 assembly members sign a letter saying they hate it. Twenty-five grass roots organizations say it's terrible. The full entire Suffolk Legislature is opposed to it. It's awful. We are in the same situation we were. We really know this is hard. We know it is not going to be easy to create these markets and create the infrastructure for beneficial reuse. We get that, but the plan was supposed to begin that process. I'm sorry, but it failed. It does not fulfill the mandate that was given to you over ten years ago. It does not phase out open-water disposal. And once again it fictitiously acts like this is environmentally benign and it is not. We are very sorry to say you have to go back to the drawing board.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments. Please also review the General Responses.

Albert Nastasi	
COMMENT	<p>Just a couple of quick stories. I didn't really have much time to prepare for this because of the lack of notification, but last year they did a small dredging operation in the basin where the Coast Guard is. I often walk down the beach and I clam and I get oysters, and I was going clamming one day. This was probably about three or four days into the dredging operation, and I'm walking down the beach and I saw all of these oysters, and three days before they started they were all healthy, beautiful oysters. Now I'm walking down the beach and I see one oyster dead, two oysters dead. There were hundreds of oysters that were dead. Was it a coincidence that they just started dredging, and three days, four days into it all of these oysters were dead? These big beautiful healthy oysters were dead. This was last year, in I believe February.</p> <p>Another part of the story is they came and they put a pile -- at low tide a gigantic pile. And I was talking to one of the operators and he said it will be there, and we will move it in the morning. In the morning this whole pile of the whole days work was gone. To say that you are going to put it down and it will stay is ridiculous.</p>
RESPONSE	<p>The Corps of Engineers has researched the dredging that took place at Eatons Neck and has gathered the following information: The dredging was performed by a contractor working for the US Coast Guard (USCG) under a general, 10-year permit issued by the USACE New York District under permit No. NAN-2008-00971-EYO. The USCG annually conducts maintenance dredging at Eatons Neck using mechanical dredging methods following the terms of the permit. The dredging is performed with a barge-mounted excavator, and the excavator is used to bucket material onto the beach. When dredge materials are placed at the permitted shore locations, the contractor is required to place the material above mean high water (specified in the permit requirements) where a bulldozer is used to spread it out. The volumes of material dredged over the past five years are as follows: 2015 - 8770 CY; 2014 - 5165 CY; 2013 - 4675 CY; 2012 - 5800 CY; 2011 - 6700 CY. The dredged materials have consistently been coarse-grained, and have not had any odors, discolorations, etc. noted during any of the past dredging cycles. As this dredging project was not performed by the Corps of Engineers, a Corps inspector was not present at the site, and we have no first-hand observations or reports concerning the work other than what was provided in the comments. Some limited impact to the benthic community is fully expected during projects such as this at the immediate dredging site and where the material is placed, but without further detail about the project we cannot speculate on the cause of the oyster mortality. Should a similar situation arise in the future, the commenter is encouraged to notify any of the following: the Corps of Engineers, the USEPA, the Environmental Police, and the entity for which the dredging is being performed (in this case the USCG). Documenting any observations with times, notes, and photographs will facilitate our ability to follow up on the specific cause of the issue.</p>
COMMENT	<p>I'm speaking for myself and the homeowners association of Eaton's Neck. We oppose it. There has to be a better plan.</p>
RESPONSE	<p>Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)</p>
COMMENT	<p>It was there, these beautiful healthy oysters, and three days into pulling up supposedly healthy dredge materials for purpose of putting it back on the beach, it killed these oysters. It is not a coincidence. Days later, all dead.</p>
RESPONSE	<p>Please see the reponse to the first comment from this letter above.</p>

George Rakowsky	
COMMENT	This is a snapshot look at the local plan for Peconic Bay, Peconic River. I notice that the plan is to move the dredged material from the harbor and dump it up river along the Peconic River. I don't understand. Has anybody actually visited that area? It's a residential area near the town, and then it's a marshland and estuary, former cranberry bogs. It is a beautiful pristine area. Can somebody explain to me where that dumping is going to occur without environmental impact?
RESPONSE	As stated in the DMMP Section 5.25.2 discussing the Peconic River, County dredging in 1960 and 1970 removed a total of more than 776,000 CY of material. While county records do not indicate where this material was placed, aerial mapping shows two large former fill areas located along the river's south shore both upstream and downstream of the Route 105 bridge. The areas are sufficient in size to accommodate additional placement, especially given the low volume of shoal (13,300 CY) anticipated for this waterway. These sites would need to be surveyed and studied, ownership determined, and regulatory approvals received before they could be used for any future dredging project placement. Additional language to this effect has been added to Section 5.25.2.
Edythe Tomkinson, Willow Ponds Civic Association	
COMMENT	When dredging is done, is that contracted out or does the Corps do that itself? And if it is contracted out, who is in charge to see that everything is done according to the way it should be done? Based on a couple of the samples I have heard before, that work was not done correctly.
RESPONSE	Dredging is typically done under contract to the US Government, however the Government does own several dredge plants. Dredging efforts under contract are overseen by a USACE construction representative and disposal efforts are monitored and tracked by an electronic monitoring system that details the track of the dredged material once it has been dredged and the location in which the material is placed.
COMMENT	And the other point that I wanted to make which involves sediment, it was brought up. I don't know that sediment moves, but I have been hearing that sediment does move when the waters get roiled up when there are storms, high winds, and traffic. To think that sediment just goes down and stays there, I don't understand that.
RESPONSE	With the nearly 40 year record of DAMOS surveys, there have been multiple opportunities to evaluate the passage of large storms (both hurricanes and nor'easters) on the dredged material deposits on the seafloor. As discussed in Section 4.4.1 of the PEIS, these investigations have demonstrated long-term stability of the deposits even at the most exposed energy sites.
COMMENT	I want to say that the 212 units at Willow Ponds, we represent them, and we would ask you to go back, and the parameters of what you use to come up with this plan might have to be changed. That is what I think ought to be revisited, not just use the same old statistics and the reason for the statistics. Change what we have to think about that would be the start and the end of the project.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)

Mark Terry, Town of Southold	
COMMENT	My name is Mark Terry. The Town of Southold Town Board and the people of Southold are strongly opposed to the continued disposal of dredged spoils in the Long Island Sound.
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
COMMENT	In 1987, Congress designated Long Island Sound as an estuary of national significance. Following World War II, the Island Sound began to decline. To address this decline, the Long Island Sound Study was authorized by Congress in 1985, establishing a collaborative partnership between Federal, State, interstate and local government agencies, as well as industries and community groups to restore and protect the sound. Long Island Sound Study's partners currently work together to implement a Comprehensive Conservation and Management Plan to maintain the health of the ecosystem, restore habitats and increase public awareness of the Sound. Since 2005, the Long Island Sound Futures Fund has invested \$13 million in 306 projects in communities surrounding the Sound. With grantee match of \$25 million, has generated a total of \$38 million for locally-based conservation. The disposal of dredge spoil is counterproductive to the collaborative funding effort and progress being made to restoring water quality, fisheries and shellfisheries of the Sound.
RESPONSE	Please see General Response to Estuary of National Significance 0015R).
COMMENT	The economy of the Town of Southold is dependent in part on fisheries, shellfisheries and recreation of Long Island Sound. Multi-generation lobstermen have repeatedly expressed their concern for the declining populations of lobsters around Fishers Island and the mainland, Southold. The question is: Has a recent study been conducted in New York State waters analyzing declining lobster populations of past dredge disposal events? Is there a
RESPONSE	The DMMP PDT attempted to cast a wide net to draw in as much data as other agencies and parties were able to provide for fisheries, and all other resources that were evaluated. Connecticut agencies had significantly more data available on fisheries resources in LIS that they were able to provide to the PDT than did NY agencies. We could only work with the data provided. Going forward, the DMMP recommends continuing the role of the interstate and inter-agency Regional Dredging Team. The RDT, at the state level, should make efforts to improve resource data collection, not just for fisheries but for other resources of concern. That new information should be used by all parties proposing dredging projects in the future to ensure that resource impacts can be minimized, regardless of the placement method used.
COMMENT	The Town has struggled to meet stormwater control regulations under New York State spending caps. The Town is currently subject to New York State Pollution Discharge and Elimination Systems (SPDES) permit for discharges and Municipal Separate Storm Sewer Systems (MS4s). It seems to be a conflict that the federal agencies who developed the MS4 permit program would consider allowing discharge of this dredged material into an estuary of national significance, when Southold Town and other towns are spending significant resources to comply with the above mandated regulations. To lessen the impact to water quality, silt and sediment are aggressively controlled under the permit. How does the MS4 permit goals objectively support the proposed action, if any?

RESPONSE	Compliance with MS4 permits can help reduce the frequency of dredging and reduce contaminant levels in harbor sediments. The more municipalities can comply with the stormwater regulations required by the Clean Water Act, the less sediment will run off into local rivers and streams, and eventually, harbors and navigation channels, which reduces the need for, or at least the frequency of dredging. Reducing stormwater discharges also reduces contaminant loads, since rainwater picks up oil, fertilizer, and other pollutants as it runs off into waterways, so it reduces the likelihood that the sediments that need to be dredged will need treatment before disposal. But reducing sediment loads in stormwater doesn't eliminate the natural erosion and sedimentation that occurs in riverine systems, so there will always be a need for dredging even if stormwater is controlled to the maximum.
COMMENT	However, the plan is still deficient in details, is missing information and includes unrealistic solutions. Case in point, Page 2-33 of the Draft Programmatic Environmental Impact Statement. Most data for the Great and Little Peconic Bays dredging center is missing from Table 2-6. Was Suffolk County Department of Public Works contacted for the information?
RESPONSE	Data on Great and Little Peconic Bay was provided by the USACE New York District and by the Suffolk County public works department, and is included in the DMMP Section 5.25 (see table 5-228).
COMMENT	Page 3-26 of the Draft Statement for August 2015, the documents propose using 450 acres of Mattituck Agricultural Fields as a potentially feasible area dewater 2,085,000 cubic yards of dredge spoil, as indicated in Table 3-9. How was this alternative identified? Where are the parcel areas identified to comprise the acreage? More technical comments from the Town of Southold will follow.
RESPONSE	The USACE used a systematic method to identify open spaces in the coastal zone of LIS. The land owners of the parcels identified were contacted and interviewed regarding their willingness to use the land for dredged material dewatering. The agricultural fields located on Oregon Road in Mattituck, NY (site NY-1) were identified as "potentially feasible in the future". Multiple (16) private land owners, as well as James McMahon of Southold Department of Public Works, were interviewed regarding these fields. The interview indicated that most of the site is currently in agricultural use (corn, field crops, vineyard, nursery stock, sod); 7 of the 16 parcels have Transferred Development Rights (TDR) to the Town of Southold; per Chapter 70 of the Town Code TDR restricts future uses of the site to agriculture only. Dewatering areas could potentially be constructed on the remaining parcels. It may be possible for the town to approve zoning changes if they desire upland placement opportunities. However, some local officials have requested that this site be removed from consideration for such use. Section 3.8.1 of the PEIS has been updated to indicate that "[d]uring the public review process, local officials requested that this site be removed from further consideration as the Town would not support that use".
COMMENT	This is in regard to the Army Corps of Engineers least costly alternatives directive. The question is: Did the alternatives factor in more than the \$38 million of the Long Island Sound Futures Fund and other entities that surround the watershed?
RESPONSE	Please see General Response to Federal Base Plan (0027R). In response to the commenter's question on the consideration of funding from the Long Island Sound Futures Fund, the answer would be "no, pursuing the source of required cost-sharing funds would be the responsibility of the cost-sharing partner."
COMMENT	The other question is: Regarding the alternatives and the cost analysis, did the alternatives factor in remediation costs of the open-water disposal method and other methods? If they prove to have adverse impacts, what is the remediation plan?

RESPONSE	As no significant long term adverse impacts have ever been identified from open water placement conducted under modern testing requirements and restrictions there are no remediation plans. Any remediation plans required in the future would need to be specifically tailored to the site and the source of the concern identified at that time. Similar to the long-term remediation of the HARS site off New Jersey, capping would be one potential remediation method.
COMMENT	Not too long ago in October there was a significant storm that hit the United States. People were shocked about the damage that it caused. We are still recovering in Southold from the damage, and also I know families who are still displaced outside of their homes because the Federal agencies haven't reacted fast enough. The point I have is the cost benefit analysis regarding alternatives. Did the alternatives factor in remediation costs if the open water dredging method fails? What is the plan, and how will it be contained, a breach in the cap? That is the major point.
RESPONSE	Capping is not longer an accepted management practice at the open water sites in LIS. Only suitable dredged materials, as determined by significant testing requirements, can be placed in the open water. Older capped mounds are periodically surveyed and sampled as part of the monitoring conducted under the DAMOS program. If cap integrity were ever determined to be compromised, then additional cap material could be placed atop the older mounds using suitable dredged material to increase cap thickness. Similarly within the harbors, filled CAD cells are also periodically monitored to assure continued cap integrity. If any compromise was ever detected (none has been to date) then additional cap material would be placed atop the cell.
Omni Hotel, New Haven, CT - September 17, 2015	
Ayanti Grant, District Director, Office of Congressman Joe Courtney	
COMMENT	Congressman Courtney is in strong support of the DMMP as it is proposed and he has already submitted an official statement indicating so.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Patricia Dillion, Connecticut General Assembly	
COMMENT	Thank you very much. I came here tonight prepared to support this. But I need to say that I am very concerned. I am very, very sensitive to the need for dredging. We really need to have navigable waterways. It seems to be standing here in New Haven this creates a disadvantage to New Haven in the long run. I don't see a clear enough transition away from open water dumping.
RESPONSE	Please see the General Response to Eliminate or Phase Out Open-Water Placement (0042R).
COMMENT	Second, it is that if there is any capacity left in the Long Island Sound, I am hearing costs from many, many people not just tonight. I guess, the question is cost to who. A, cost to the environment. B, if someone from, let's say, another part of the state is going to be dumping in New Haven Harbor, New Haven has needs as well. And has a large amount of tax exempt property and a tremendous demands on pressure on our community and our budgets. We shouldn't also have to put ourselves in the position of driving up the costs of any future development that might require any dredging.
RESPONSE	Please see General Response to Dredging Needs and Economy, and No Action Alternative (0006R)

COMMENT	<p>Safety is absolutely what a lot of people are thinking about. I've heard a lot tonight about the screening. I will look further to see what your methodology is for or determining, A, the cost and B, how you make safety decisions. I know there's something existing there, but I have to say I am disappointed because I thought the ten-year process would lead to something a little more developed.</p> <p>I know you did your best and you all have a job to do, but I am not sure it is fair to New Haven. So at this point, I cannot support it.</p>
RESPONSE	Thank-you for taking the time to review the LIS DMMP documents and provide us with your comments.
Gary Eucalito, Connecticut Office of Policy and Management	
COMMENT	<p>I want to thank you the members of the Corps and EPA as well as the Connecticut and New York State employees who have contributed and worked on this for over eight years. Tomorrow Governor Malloy will be submitting a letter in support of the draft plan to General Bostick, so I wanted to use this opportunity to explain why the Governor and OPM along with our sister agencies believe the draft plan is essential to Connecticut's economic and maritime future. The draft plan under discussion this evening is practical, cost effective, science-based and environmentally sound. It concludes that a range of alternatives should remain available for the handling of dredge material including beach renourishment, wetland restoration and open water disposal.</p> <p>I recognize that some may prefer to close existing open water sites in the Sound, for Connecticut that is not an option. Connecticut is fully committed to using these alternative open water disposal when practical and the data clearly shows we have done so over the past decade. Due to our geology and nature of our fine grain sediment dredged from our harbors and marinas Connecticut's dredged materials is often ill-suited for beneficial reuse. And such is critical for that the open water sites remain available.</p>
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	Connecticut's management of dredge material has been and will continue to be strictly regulated by state and federal agencies. All dredge material slated for disposal at open water sites is subjected to rigorous testing to insure federal and state standards are met.
RESPONSE	In the future, any dredged material proposed for open water placement would need to be found suitable through application of the testing process described in the Federal testing manuals, as is currently the case. The DMMP also proposes to continue the DAMOS Program efforts to study and monitor the existing placement sites impacts and recovery, and also recommends that DAMOS examine some of the older historic open water sites to determine if any could benefit from remediation placement of suitable dredged materials.
COMMENT	Furthermore, 35 years of monitoring open water sites in the Sound show that open water disposal has no long term adverse effect on water quality or the ecosystem.
RESPONSE	Please see the General Response to Environmental Degradation/Consequences and Economic Cost of Open-Water Placement (0002R)
COMMENT	Studies have shown that maritime-related commerce provides nearly 7 billion dollars in economic output and 40,000 jobs in Connecticut alone. To grow this sector of our economy, dredging projects are necessary to insure the safe use of our harbors, ports and marinas. Since 2011 we have invested close to 40 million dollars in state funds to carry out harbor improvement projects mostly consisting of long overdue dredging. These projects as well those funded by the Corps and provide recreational boating, ferries, water borne commerce as well as national security activities related to the sub base, submarine construction and the Coast Guard.

RESPONSE	The DMMP recognizes the importance of cost-effective navigational dredging to the Connecticut's economy, its fishing, boating and tourist industry, as well as both the U.S. Navy's national defense mission, and the missions of the U.S. Coast Guard.
COMMENT	Without the continued availability of the four open water disposal sites in Long Island Sound, Connecticut's maritime industry and overall economy will suffer. Dredging will become economically unfeasible, marinas may shutter and future generations will lose their connection to one of the most of the important natural resources in our state.
RESPONSE	Please see the General Response to Availability of Open-Water Alternatives (0041R)
COMMENT	Again, we strongly support the findings and recommendations of the proposed DMMP and urge its prompt adoption.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
Michael Pimer, City Point Yacht Club	
COMMENT	What I would like to say is I would love to see New Haven's ledge between the two breakwaters taken down. I know it is a big bone of contention with the Army Corps of Engineers because it will cost money. But until we get rid of the ledge, the ships of deeper draft of 35 feet cannot come up into our harbor. If not we are going to end up with barges, three, four, five barges instead of one ship. Extra money, extra chances of spills. I was in New Haven Harbor when the Exxon Gettysburg sprung a hole on the same ledge I'm talking about going around the bend and spilled oil in all of New Haven Harbor and we had to try to cleanup the mess. I would like to see our channel dug to 40 feet, 42 feet something other than 35. At same time I'm talking about that, the City Point Yacht Club, there's 300 people standing behind me saying we've already dredged the federal channel at our expense in order to keep our boats there. It's coming around again. This would be the second time, and this is the federal channel.
RESPONSE	The 35-foot deep draft channels at New Haven are maintained about every ten years and were last maintained in 2014. The USACE and the New Haven Port Authority are just beginning a study to examine deepening the 35-foot project at New Haven to 40 feet. That study will begin in December 2015 and will take about three years to complete. If authorized and constructed, such a project will include at least partial deepening across the ledge. The FNP does not include any areas occupied by slips or vessel berths, which must be dredged at non-Federal expense.
COMMENT	I would like to see the West River included in the dredging project for New Haven Harbor. I didn't see anything on your screen about the West River in New Haven. My boat draws six foot. I've run aground in the main channel in several spots. It is time to do something considering the sub channel that runs in front of the South School and it runs in front of another yacht club which has approximately the same 300 members that I represent.
RESPONSE	Maintenance dredging of the existing Federal channel and anchorage area in the West River segment of New Haven Harbor would need to be requested by the City. The USACE would then examine navigation uses of the river, conduct condition surveys of project depths, determine shoal volumes and costs for dredging. The USACE could perform maintenance of that project segment if there was a demonstrated need and if funding were made available through the Federal budget process. But the City must make a request to being the process.

COMMENT	The City of West Haven is going to put in a waterfront project. They are going to want to have larger vessels in there. The Havens it's called. They won't be able to get the vessels in there. They'll tie them up elsewhere because there isn't enough water. It hasn't been done. It hasn't been considered. I would like you to consider the West River project, New Haven deepen it down to ten or 12 feet 2 over the existing six feet now in places.
RESPONSE	Increasing the authorized depth of any Federal Navigation Project requires a study to examine the economic justification for such work, the environmental acceptability and engineering feasibility. Requests for new studies under the USACE small navigation projects authority (Section 107) must be made by the State or Municipality. Studies take several years to complete and require non-Federal cost-sharing, as does design and construction for any increase in project dimensions.
Paul Filippi	
COMMENT	My family's owned and operated Ballards on Block Island over the last 50 years. Approximately ten years ago we built a small marina in Old Harbor, Block Island and we were able to use all the material for beneficial reuse. We used the sand to renourish our beach and we used the cobble and rock material for construction projects on the other side of the island. So, I have had personal experience with beneficial use of dredged spoils. We offer Ballard's Beach as a possible dredge disposal site for the sand.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	We support the Corps in its efforts going forward. And on Block Island, we get a lot of benefits from the boating industry in Connecticut. I personally know many boaters from Connecticut and understand the plight of the shallowness that is happening here. I hope everyone comes together and get this dredging accomplished.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Tim Visel	
COMMENT	I have been involved in dredging. Mike and I go back to the first DAMOS project here in New Haven. I worked with them for a while. I have seen a lot. I have written extensively about the positive and the negative side of dredging. I would like to leave this for you tonight. I don't know if people realize how many jobs for young people and the economic ports there are for dredging on both coasts. However, the last few years we have seen sulfate increase. The last areas to hold on to any kind of life were the dredged channels. Dredging in the future will become more of a friend than a foe. I want everyone to know that. I reference my 13-page paper a few years ago and my testimony in 2012. And I will be submitting additional comments.
RESPONSE	Please see General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)

Patricia Doyle, Guilford Yacht Club	
COMMENT	<p>The Guilford Yacht Club is a small private marina facility. We need to dredge every year. We work with the Corps of Engineers and the state. We dredge between 12 and 15000 yards every year which cost goes over \$350,000 borne by the 150 members of our association. We rely on and we need open offshore dredging disposal sites to continue to be able to maintain our channel. Our channel is not just for us, our channel supports two other private boatyards for both repair and maintenance facilities as well as another marina and commercial fishing. We've been looking this year for the first time we tried hydraulic dredging. The project was interesting. The project faced many challenges. We are working through those challenges now. Now we are stuck with 6000 yards of spoils uplands that we can't get rid of. The state is giving us guidance in terms of the salinity of our materials and don't want us putting it off site. Maybe this year we can do hydraulic dredging one more time for the basin, but we are not sure what we can do after that because we don't have a disposal alternative now with our dry spoils on land. So we rely on the state. We are working with the state, but we are still not getting good and solid answers.</p> <p>Meanwhile the channel, no hydraulic dredger we worked with is interested in trying to hydraulically dredge or try to remove the spoils. We are not a big project. We don't have access and range to gain big project money and big project opportunities. And so again we still need and rely on offshore disposal for the time being. We are willing and happy to work with the state, the Corps whoever on alternatives. We want to push the envelope because it is a huge cost yearly for our people to continue ongoing dredging needs, but we have to maintain our channel for our use and the use of others around us. So, we look forward and hope you continue to seek those alternatives for us.</p>
RESPONSE	<p>The USACE looks forward to working with other stakeholders in the LIS region in investigating and implementing cost effective and environmentally acceptable placement options for dredged material. We understand however that any increases in placement costs for such alternatives incurred by non-Federal projects will need to be borne by those non-Federal interests.</p>
Brian Virtue	
COMMENT	<p>The borrow pits at Morris Cove it seems to be kind designated as one of the sites for unsuitable material, toxic stuff. And I find it unconscionable to be honest with you. It is yards off a fishing spot. It is yards from two fishing piers, from two beaches, waterways. The Morris Cove is used for all sorts of water sports and boating. There's a marina there. A marina that used to be dredged yearly. It's not allowed to fill these borrow pits. You borrowed clean fill at some point to build highways and now they seem to be designated for the worst of the worst materials.</p>

	<p>On top of that, at that meeting we all voiced, I think, some pretty legitimate concerns. There's low salinity levels at the bottom of the pit indicating freshwater is coming from somewhere. I assume it's from the ground water. That indicates to me and one of your officials at the time kind of had an epiphany, oh, I didn't know there was low salinity levels at the bottom of these pits and maybe that does indicate ground water transfer. These issues to my knowledge have never been addressed. I feel like I am wasting my time at the last meeting. I hope I'm not wasting my time this time. I would like to have some answers on that. You took clean fill out of the borrow pits, put clean fill in. We love to have Guilford's clean sediment. Haul it over. Fill in the pits so we can't get the toxic stuff put in there. You say it is going to take nine months to fill these pits with the toxic waste. What happens in that nine months. What happens if a storm comes through? It's yards. You can so throw a stone from the water's edge into these pits and you want to fill them with horrible toxic and heavy metals and PCBs. And there's groundwater contaminated coming out of it. I can't believe that we are here talking about it. It may be more expensive to drop it somewhere else, to build CADs in Bridgeport Harbor or wherever you want to put this stuff, but you've got to spend the money. You can't put this in this recreation area. If we need to keep the open water sites open -- i don't know. Please don't put it in the borrow pits in Morris Cove.</p>
RESPONSE	<p>In response to the many comments received from the public and agencies on the use of the Morris Cove Borrow Pit as a CAD cell, the section of the DMMP in Chapter 4 (Section 4.9.8) describing Morris Cove and its potential use has been expanded to include additional information on CAD cell technology and on the Morris Cove site in particular.</p>
Donald Shoop	
COMMENT	<p>No matter what we do in engineering we always have unintended consequences. And no matter how thoroughly we may study something scientifically, we find the thing goes wrong in the end. You're playing in this case with a very tense situation because as Brian said the [Morris Cove] borrow pit is too close to where people actually are. And you're bringing in materials that are not sanitary they are toxic.</p>
RESPONSE	<p>Please see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)</p>
COMMENT	<p>No matter what we do in engineering we always have unintended consequences. And no matter how thoroughly we may study something scientifically, we find the thing goes wrong in the end. You're playing in this case with a very tense situation because as Brian said the [Morris Cove] borrow pit is too close to where people actually are. And you're bringing in materials that are not sanitary they are toxic.</p>
RESPONSE	<p>Please see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)</p>
COMMENT	<p>One possibility is the United States has a 200 mile limit. Why can't you take this 150 miles out to sea and dump it? If it is too contaminated to take out and put in the open ocean, then it surely is too contaminated to put in Morris Cove.</p>
RESPONSE	<p>Please see the General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)</p>

Claudia Bosch	
COMMENT	<p>In your DMMP we can read that it identifies environmentally acceptable placement alternatives. I do not think so. Why? So based on studies by the Army Corp of Engineers, Morris Cove is a relatively clean body of water based on the DAMOS studies. It's only suitable for clean fill. It is a place where my children swim. And it is without hesitation or worries about possible health risks. In this environment according to the DMMP, all type of dredging materials can be placed without restriction as long as a cap is put in place. While almost all other sites are with this label are land filled, Morris Cove is currently not polluted. If you get your way you will do so. You're dead set bringing in dirt, any dirt that is so contaminated it cannot be placed elsewhere. It cannot be placed directly on our beaches or into our basement. However, indirectly, this is exactly what you're going to do. The borrow pit will have water intrusion. This is according to this DAMOS study in 2003. Water in equals water out. This is by osmosis. The hazardous carcinogen substances will eventually be in the ground water and thus in my neighbor's basement. In the DMMP you acknowledged that, but you still do not rule out the cove as a dumping ground for whatever fill there is. What you do not acknowledge is that even during filling, according to your own words in 2010, at least two percent of the material, your fill gets lost. Lost does not mean it disappears rather it gets dispersed into the water then it settles into the beaches and later it gets blown in our yards. You did a study about PCB concentrations at Boston Harbor CAD cell before capping, during and after capping. During capping the contamination level went up more than hundred times. Your planned Morris Cove CAD cell is not located in a similar setting like a CAD cell in Boston Harbor. No, it is close proximity to a neighborhood which uses the cove recreationally. Morris Cove outer harbor. This is not a major harbor. My children would not allowed to swim in New Haven Harbor.</p> <p>You do not reflect there when you write on page 510, Morris Cove borrow pit could cited as suitable material for silt since this site is located inside the harbor and not in the waters of Long Island Sound. How dare you. You are invited to come out there and you will realize this is not harbor.</p>
RESPONSE	Please see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)
COMMENT	The bottom line, it's all about costs. If you look through your list, you can see this is always a cheap alternative. This is not about the environment, this is just about costs. So you value money not the environment.
RESPONSE	Please see the General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R)
Josephine Walter	
COMMENT	I live in Morris Cove. I am all for dredging and keeping the shipping lanes open. I'm for all that. I want to protect our borrow pit. I would like to speak for those who couldn't get home from work to make the 6 o'clock meeting. That is really hard to get to a downtown location which is also hard. I would like to speak for those that just can't afford to park and for the taxpayers who are very confused about why we are spending all this money to have this place set aside when in fact there's lots of places in New Haven we could done this and it would have cost us nothing. My message is simple, this is a borrow pit. And the key word is borrow. Our borrow pit left yards and yards of clean fill to help shore up the interstate. If it is to be paid back, please do so with the same currency, clean fill it seems only fair.
RESPONSE	Please see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)

John Cox	
COMMENT	Just over five years ago many of us were here in New Haven to discuss the Army Corps of Engineers proposed dumping of toxic sludge dredged from Bridgeport Harbor in the Morris Cove borrow pit. At that time the community provided scientific and empirical information clearly demonstrating why it was a genuinely bad idea. This became part of the public record in the form oral testimony and written submissions and now five years later without any reputation of our evidence, the cove is again recommended for unsuitable material. I understand this is a draft decision and not a decision document, but there is no acknowledgment or discussion of the issues we raised earlier. That is not the way processes are supposed to work.
RESPONSE	Please see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)
COMMENT	Quickly, let me review some of the problems that I had with the 2010 analysis. At that time it was based on an 8 year old analysis. Now it is 13-year old analysis. Michael Climber who spoke tonight who is a harbor master and also a Navy diver, testified about the borrow pit. And one of the comments he made was that it's in constant change. So surely a new analysis is warranted before any activity of Morris Cove borrow pit takes place. Second, the earlier reference, the unique ground water situation in Morris Cove was not addressed in either 2010 or now. And studies are needed to determine where the toxic material goes that is placed there. Third, Morris Cove is residential community and a source of recreation activities for people in New Haven and throughout the region as it has the only sandy beaches on Long Island Sound located in New Haven. Having the toxic sludge dropped into Morris Cove and uncovered for 9 to 12 months, which was the original proposal, would eliminate one whole season of activities. And even with the cap there is no guarantee the water would be usable for marine recreation. And fourth, the economic analysis which drove the choice of Morris Cove for dumping of the toxic waste was flawed. No funds were identified to compensate New Haven oyster farmers for their loss of activity and the disruption of their business. Just by way of example, the cross Sound cable project offered them \$5 million. A cost effective study of the Morris Cove borrow pit would change the outcome. I take heart from the fact that this is a draft decision and I hope that you corporate our comments in the final decision. I know we are not in a dialogue here, but let me put something out for consideration. There was a lot of evidence put forward in 2010 from the neighborhood and that became part of the public record. I would enjoy consideration of incorporating that into this public record so that that could be included. Much of the information you're hearing tonight is repeat. But there's also more scientific information that came forward in 2010 and it's specifically focused on this issue.
RESPONSE	Please see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)

Renate Dicks	
COMMENT	I am also from Morris Cove. I lived there for many years, not as long as some other people who have spoken tonight. I love to hear the history of this area. And one of the things that constantly bothers me when I look at the old photographs and postcard and such of Morris Cove is the beach that disappeared. And that disappeared when the Army Corps dug out materials for I-95 and created the highway. That is fine and good. But that beach disappeared and now the houses that are on that disappeared beach are also in danger of disappearing. Those people have to shore up their foundations as more and more water comes and weakens their homes. I would like to propose an overlooked beneficial use site which is replacement of missing beach in Morris Cove after the borrow pit is similarly refilled with only clean fill. We deserve to get back what was taken, more than the borrow pit, but the beach which is there for everyone's use and is no longer there and is a wonderful opportunity for clean, sandy fill to be put back where it was removed.
RESPONSE	Please see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)
Rachel Heerema	
COMMENT	I support the U.S. Army Corp of Engineers. I am in favor of the overall dredging plan and support the shipping and business industry that would be impacted these dredging materials.
RESPONSE	Please see the General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	I am opposed to using the Morris Cove borrow pit for any unsuitable materials whether it is capped or uncapped.
RESPONSE	Please see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)
COMMENT	I am opposed to the organization of this report with the lowest cost option as the leading metric and with the environmental impact as it's unweighted factor. Distance should have been folded into the plan, into the cost analysis of the plan, that would have increased environmental impact as a weighted factor. It is a much less important metric in decision-making than overall environmental impact.
RESPONSE	Unit cost of placement was not used as a screening criteria until after all other criteria had been weighted and applied. The cost estimates developed for each project and alternative included the haul distance over water or over land from the dredging to the placement site. All aspects of a placement alternative, including cost, must be weighed when considering which is the Federal Base Plan. When ultimately alternatives are evaluated on a project-specific basis, the environmental benefits of beneficial use alternatives will be specifically identified and weighed against the incremental cost to determine justification for that alternative.
COMMENT	Specific to Morris Cove, our borrow pit is much too close to a residential neighborhood to be as popular as it is. Lack of funds by strapped urban communities should not make us the default dumping areas for the entire plan. Costs are short-term. Environmental impacts and human impacts can be is a very, very long-term.
RESPONSE	Please see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)

Stephen Tagliatella	
COMMENT	I saw in one of our earlier slides which showed the circles and they showed the circles of the percentage of federal sites versus private dredging. And it was interesting to me to see that the cornfield site is 50 percent private. So it is supporting a tremendous amount of commerce from marina in and around the Connecticut areas. I am sure you bring in from areas as well. So I think it is a very important site that we should consider in the future because so many private business are affected by that particular site and I wanted to make a further note on that.
RESPONSE	Please see the General Response to Availability of Open-Water Alternatives (0041R)
COMMENT	We are a driving force in the Old Saybrook economy. We are one of the largest employer in Old Saybrook and we are probably the largest taxpayer in Old Saybrook. And if we cannot dredge efficiently and cost effectively and of course, environmentally responsibly, then we will no longer be business. Our business is being threatened by not having a reasonable cost solution to dredging in Old Saybrook. So we ask you to please take all things into consideration. It is a very difficult business environment for Connecticut businesses. We have lots of obstacles and we are not looking forward to more obstacles.
RESPONSE	Please see the General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
John Johnson, Connecticut Marine Trades Association	
COMMENT	We [Connecticut Marine Trades Association] as an association endorse the DMMP 100 percent. I find it very interesting to hear the Governor's representative here tonight in full support of the DMMP. As we all know Commissioner Klee has also endorsed the DMMP.
RESPONSE	Thank you for your support of the Long Island Sound DMMP.
COMMENT	We [Connecticut Marine Trades Association] are as a community of industry are environmentalists ourselves. And while we don't get into the issues of Morris Cove, it sounds like that is something that needs to be looked at again, overall open water disposal of dredged material is very important to the economic life of our industry.
RESPONSE	Please see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)
Lynne Bonnett	
COMMENT	I ask you to please consider the environmental and public health impacts of bringing toxic material into an area that's already heavily contaminated from industrial use. And bringing it in from outside or even using what is in our community to increase the pollution load of people that live here. We have many people that fish for subsistence to feed their family. We know the fish have mercury, PCBs. They don't speak English. They don't know they shouldn't be taking this home to feed their families. I think you have a responsibility to consider not just the fixed cost of what's easiest for you to do, but what the long term costs for us as a community, and what makes sense for us.
RESPONSE	Please see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)
COMMENT	We understand the dredging materials are toxic. We understand people in New York don't want to put it in the Sound because they think they are polluting us.
RESPONSE	Please see the General Response to Sediment Contamination and Dredged Material Sampling and Testing (0005R)

COMMENT	It is regional problem and we ask that the region help us to address what to do with this material because we do need to find a different solution. I do support beneficial use, but what does that mean? Who's going to help us pay for it if it is above the cost of your federal base plan. So, making cement more expensive. You are not going to be in favor of that. It gets it out of the harbor. It gets it out of our environment. It not going to leach out in rain. It is going to be used for road construction which is already getting pollution from traffic. It makes a lot of sense, but your cost analysis it is the least favorable.
RESPONSE	Please see the General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R)
Ann Duwayne, Guilford Boatyard	
COMMENT	We [Guilford Boatyard] are a boatyard and boat dealer located on the West River in Guilford, Connecticut. I support the Army Corp of Engineers Dredge Material Management Plan. The Town of Guilford has had the federal channel, the harbor of refuge, the channel marina dredged this past winter using open water disposal and the Guilford Yacht Club the previous year had dredged the West River channel using open water disposal. This seems to be the only viable alternative for disposal dredged materials in the Guilford area. There doesn't seem to be anything upland other than what Mr. Doyle talked about in the yacht club and that is an interesting problem. We need to have this dredge material management plan accepted so that open water disposal remains an option for the continued dredging of the Guilford harbor, the rivers and marinas and keep our seven employees employed.
RESPONSE	Please see the General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
Louis Burch, Citizens Campaign for the Environment	
COMMENT	This Draft Dredged Material Management Plan is business as usual plan and continued to use the Sound as dump for dredged material for the next 30 years.
RESPONSE	Please see the General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	It lacks a clear focus on beneficial reuse alternatives. It uses a vague and incomplete cost benefit analysis to rule out beneficial reuse. And it is without meaningful consideration of opportunities that are already available in the in the Long Island Sound region and our neighboring states including the fact there is no mention of the State of Pennsylvania which is actively seeking dredge material to help reclaim more than 3000 abandon mines throughout the state. This plan should not discount these type of options due to a perceived lack of public interest or initial funds. May I remind you that taxpayers of already invested hundreds of millions of dollars into Sound restoration measures and that is the investment we need to be protecting.
RESPONSE	Please see the General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)

COMMENT	Additionally, the Draft Dredged Material Management Plan recommends the use of CAD cells for the disposal of heavily contaminated materials deemed unsuitable for open water disposal. This typically means that these contain elevated levels of PCBs, volatile organic compounds and heavy metals such as mercury lead and copper. This means the disposal of the most contaminated dredge waste is in our harbors in close proximity to the general public. It does not make sense to take material that is too contaminated to dump in the open water and dispose of it in a harbor that the public uses for swimming and fishing.
RESPONSE	Please see the General Response to Confined Aquatic Disposal Cell Development (0008R)
COMMENT	Furthermore the DMMP should be recommending disposal practices that prioritize environmental impacts over monetary costs. The State of Rhode Island, for example, prohibits open water dumping unless it can be proven that that dumping will not contribute to the degradation of those waters or unless all other alternatives would be more harmful to the environment.
RESPONSE	Please see the General Response to Federal Base Plan Development and Availability of Alternatives to Open Water Placement (0027R)
COMMENT	Furthermore, the Environmental Impact Statement fails to evaluate and have an honest assessment of how dumping dredge material will contribute to harmful contaminants such nitrogen going into Long Island Sound which the Army Corp acknowledges plays a significant role in the deterioration of Long Island Sound water quality and the growth of harmful algae blooms. The document fails to quantify the amount of nitrogen that will enter the Sound over the next 30 years due to millions of cubic yards of dredged material.
RESPONSE	Please see the General Response to Nitrogen Loading (0153R)
COMMENT	Furthermore it is deficient in quantifying the effects that open water dumping will have on Long Island Sound water quality bottom land and marine species. Existing dump sites and CAD cells are located in federally designated essential fish habitats for several fish species. The Army Corp acknowledges that contaminants in and around disposal sites include elevated levels of PCBs in the fish. And elevated levels of copper in the lobsters and yet they fail to address how this dumping is going to contribute to that kind of contamination in Long Island Sound.
RESPONSE	Please see the General Response to Sediment Contamination and Dredged Material Sampling and Testing (0005R)
COMMENT	[T]he Army Corps' plan does not present a plan to reduce contaminants that are already found at these disposal sites. In fact, it seems to suggest that contamination at low levels is an acceptable consequence of dredge dumping, that is why we are opposed to this document in its current form. It's fundamentally flawed and it does not explore the beneficial reuse opportunities in a meaningful way, therefore it fails to meet the mandate of 2005 agreement between New York and Connecticut.
RESPONSE	Please see General Response to Open-Water Placement (0004R). Additionally, prior to the passage of the CWA and MPRSA, the aquatic disposal of dredged material as well as mixed debris and even hazardous wastes with little or no restriction clearly had the potential for measureable and long-term impacts in Long Island Sound. This was the case in the coastal waters of much of the United States. The sediment testing requirements and restrictions implemented by the CWA and MPRSA were intended to minimize the potential for impact. Nearly 40 years of DAMOS monitoring has clearly shown that aquatic placement of dredged material can be done responsibly, with limited short-term impacts to the benthic system and the water column and no measureable long-term impacts.

Christian McGugan, Glenmore Marina	
COMMENT	I am the owner of Glenmore Marina and Glenmore Marina Contracting. Both are in Mystic. Both are family-owned businesses. Glenmore Marina Contracting is a dredging business. We have been dredging for about 50 years, so obviously I am going to strongly support the DMMP. Probably not for the obvious reasons. The idea of having four dump sites, we can call them dump sites, because that's what they are, disposal, relocation whatever you want to call it. That is what they are. You have silt, it is going to happen. It is a fact of life.
RESPONSE	Please see the General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	I think the Army Corps knows probably better than I do how difficult is to find an upland site and how difficult it is to conjure up some sort of alternative disposal. If someone comes up with a sediment vaporizer that is mobile and you can take it from marina to marina, then you got it. There is no such thing. They work hard to find a viable way to get rid of dredged material. We have done in recent years upland dredging projects. The cost is not doable.
RESPONSE	Please see the General Response to Upland Placement Alternatives for Dredged Material (0085R)
COMMENT	I have a small private business. I have a marina. I have a construction business. So, I have a fairly educated view of the economics and the feasibility and the environmental impacts of it. I was one of the first clean marinas in the State of Connecticut. I am concerned about the environment. But the reality of it is that the number of upland sites are becoming fewer and fewer over the years. It's hard to find. They have all been used over the last few years. A lot of what the opposition is saying is a laundry list of items that they would like the Army Corps to do to sort of prove this out. I think they spent about 50 million dollars in the last ten years to sort of prove it out.
RESPONSE	Please see the General Response to Upland Placement Alternatives for Dredged Material (0085R)
COMMENT	I read a lot of studies, and data. I guess, a small snapshot would be if the DMMP doesn't go through, and these four sites are not usable -- this is just off the top of my head as I'm sitting there. Off the top of my head 1500 boaters and I don't know how many jobs will be eliminated, not in ten years, not 20 years but like five years. That is off the top of my head. It's really important that offshore disposal, until there is a viable vaporizer -- it's the same reason we are still not driving around in electric cars. We are still going to the gas pump. We are not there yet. There's a way to get there. I am all for getting there. It's just not there yet.
RESPONSE	Please see the General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
COMMENT	This is the best alternative and I support it.
RESPONSE	Please see the General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)

Dana Hudson, Mystic Seaport	
COMMENT	The Mystic River channel was dredged last winter. And that was a wonderful project. I think it was last done in the '50s and part hadn't been done since the '40s. It is very important as it now allows you, the way the channel is defined, to be able to come up and down the river. It's important for our deep draft vessels to be able to get out of the river if they need work beyond what we can do. We have our own ship lift, but there are bound to be times where we wouldn't be able to accomplish the work. The river was last dredged about 30 years ago. We dredged at the same time. Some of the approaches to the channels shoals as time goes by, and it's becoming vital again for us to be able to dredge those deep water berths to protect those national historic landmarks. We also need to dredge our transient docking areas to enable us to continue to accommodate large vessels and smaller, and in our ship lift area for continued use of our deep draft vessels. We made a significant investment in building that slip lift for us to be able to use. We are also considered a harbor of safe refuge during storms by both large and small vessels. We fill up really fast when there's a hurricane coming. Some of those, for instance, the research vessel in Connecticut comes up and uses our facility in its storm preparation.
RESPONSE	Please see the General Response to Dredging Needs and Economy, and No Action Alternative (0006R)
COMMENT	I just like to say it is vitally important for there to be a viable opportunity for the disposal of appropriate material in open water. We [Mystic Seaport] know that some material won't be able to. As Christian mentioned some of it does get disposed of in an upland way when we rebuild our dock. Our ship lift, we needed to dispose of some material upland on our own property. It was very expensive. We didn't try to fight that because it was contaminated material. My concern is that we need to be able to continue to dispose of appropriate material in the open water.
RESPONSE	Please see the General Response to Availability of Open-Water Alternatives (0041R)
Alan Berrien	
COMMENT	My daughter and I own Milford Boat Works and Milford Harbor Marina. It was started in 1946 by my parents. You wouldn't have to dredge at all if we had a way of having the city maintain the upland district meaning the rivers and ponds and the harbor because all the oak leaves and silt comes down and can be dredge up there without the kind of intensive need that we have when we have to dredge it and dispose of it offshore. It would be important for us in the harbor, we have over 2000 boats in Milford Harbor. It would be nice if we could get our local community and the state to permit the removal of the decaying oak leaves and the silt that comes down the river from everybody's backyard and from the couple of communities upstream. It would be a lot less dredging in our harbor and our river if we maintained the upland freshwater river.
RESPONSE	Please see the General Response to Sediment Reduction Efforts (0009R)
Linda Pinsky	
COMMENT	I am also a member of Morris Cove. I too have been to the meetings. I found that the meetings were supposed to be notifying us. I've never saw a notification over the last couple of years this was still going on. This was all news to me. I don't think you guys were fair to us in any way by carrying on without proper notification to our community. We have organized meetings every month. It's not hard to notify us. Obviously, it wasn't intended to notify us.
RESPONSE	Please see the General Response to Public Involvement Process-NEPA (0003R)

COMMENT	Now, we live in a small community. It's the only shore, beach community in New Haven. It has two parks. One that is very important for migration. We have another park that's also used for fishing and recreation. We have schools along this water. And we have a very low water tide table in Morris Cove. It is lower than Sarasota, Florida. We have a very low tide table. In a storm, the water does flow over the street, does flow over people's yards and basements and it does contaminate everything around it. It gets into our grass, our dogs and kids play in the grass. They pick up the PCBs. They pick up the toxins, and then it's spread everywhere. Birds will poop seeds all over and pollinate the world. This is going to be pollinate our areas with PCBs. We don't need it.
RESPONSE	Please see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)
COMMENT	We have a sewer plant, we have electrical, we have increased insurance, we have increased tax costs, we have increased water flood insurance. This is the nail in the coffin for a community that's been around a long time. That has beautiful arts, everything that is made in New Haven a beautiful thing. And this is going to be nail in the coffin, and our funds and everything is going to dry up. You might as well kill us now.
RESPONSE	Please see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)
COMMENT	My neighborhood has a harbor, small marina. He dredges all the time. But he's not allowed to put his clean material into that pit, he has to take it all the way out to open water to dump it. And it costs thousands and thousands of dollars. He can put his clean stuff into our pit because it's from the same area.
RESPONSE	Please see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)
COMMENT	I think it is ridiculous that you guys are even considering this. And it's for the almighty dollar. There's a lot of businesses who don't even live there, who won't let their kids play there [Morris Cove].
RESPONSE	Please see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)
Kathleen Burns, Connecticut Marine Trades Association	
COMMENT	Our organization [Marine Trades Association] has submitted written testimony in favor and in support of the DMMP.
RESPONSE	Please see the General Response to Expressions of Opposition or Support for the DMMP and/or Open-Water Placement Alternatives, Beneficial Use Alternatives, R&D of Alternatives (0004R)
COMMENT	I would just like to address some of the economic sides of this. Everyday I work with our 300 member businesses. There is approximately 7000 employees of the recreational boating business. Aside from those that work in the inland lakes and further upriver and the majority are on the shoreline. If you do the math, 300 business, 7000 employees, this is all small businesses. It is tied directly to access to their facilities. We would like to consider the economic side of it their livelihood and the towns that these facilities support that are required to have access. We ask you to continue to consider that access is critical to the economic viability of our facilities, region and state.
RESPONSE	Please see the General Response to Dredging Needs and Economy, and No Action Alternative (0006R)

COMMENT	I am resident of New Haven. Used to be a resident of Morris Cove. I was involved in efforts a few years ago to combat putting dredge material from Bridgeport into Morris Cove. This has been covered. I just want to emphasize that I think it is really a shame to put all that toxic material in Morris Cove. And the fact that 1 to 2 percent is lost and it's uncapped for a number of months. Serious qualities of the groundwater underneath, that portion of the plan I object to. I am all for dredging New Haven, but the fill should be reserved for clean material from New Haven.
RESPONSE	Please see the General Response to the Morris Cove Borrow Pit CAD Cell Alternative at New Haven Harbor (0148R)

APPENDIX A

Part 1A

Final DMMP/PEIS Transmittals



DEPARTMENT OF THE ARMY
NEW ENGLAND DISTRICT, US ARMY CORPS OF ENGINEERS
696 VIRGINIA ROAD
CONCORD MA 01742-2751

December 31, 2015

Programs & Project Management Division
Civil/IIS Project Management Branch

The Honorable Dannel P. Malloy
Governor of Connecticut
State Capitol
210 Capitol Avenue
Hartford, Connecticut 06106

Dear Governor Malloy:

Enclosed please find a CD copy of the Final Dredged Material Management Plan (DMMP) and Final Programmatic Environmental Impact Statement (PEIS) for Long Island Sound. The draft DMMP/PEIS was released for public and agency review on August 17, 2015. Six public hearings were held, three each in Connecticut and New York. Public and agency comments were taken into consideration in preparing the final documents.

The DMMP/PEIS should serve as a guideline for future dredged material management actions in Long Island Sound. Moving forward, a significant level of partnership will be necessary if the DMMP's goal of reducing reliance on open water placement of dredged materials is to be realized. This partnership is needed both among the states (Connecticut, New York and Rhode Island) and between all of the states and the Federal government. The U.S. Army Corps of Engineers (USACE) is prepared to assist the states, where Federal interest in particular solutions is warranted, in achieving this goal, as outlined in the DMMP's recommendations.

These final documents will also be made available to the public and other agencies through the USACE New England District and New York District websites on January 11, 2016.

If you have any questions or comments, please contact Ms. Meghan Quinn, Project Manager, at (978) 318-8179, or Mr. Michael Keegan, Chief, Civil/IIS Project Management Branch, at (978) 318-8087. The USACE looks forward to working with the states and other stakeholders in implementing the recommendations of the DMMP.

Sincerely,

A handwritten signature in black ink, appearing to read 'CJB', with a stylized flourish extending from the bottom.

Christopher J. Barron
Colonel, Corps of Engineers
District Engineer

Enclosures

Same Letter Sent to: see attached

SAME LETTER SENT TO:

The Honorable Richard Blumenthal
United States Senate
702 Hart Senate Office Building
Washington, DC 20510

Copy Furnished:
The Honorable Richard Blumenthal
United States Senate
90 State House Square, 10th Floor
Hartford, CT 06103

The Honorable Chris Murphy
United States Senate
Washington, D.C. 20510

Copy Furnished:
The Honorable Chris Murphy
United States Senate
One Constitution Plaza, 7th Floor
Hartford, CT 06103

The Honorable John Larson
United States House of Representatives
1501 Longworth House Office Bldg
Washington, D.C. 20515

Copy Furnished:
The Honorable John Larson
United States Representative
221 Main Street, 2nd Floor
Hartford, CT 06106

The Honorable Joe Courtney
United States House of Representatives
2348 Rayburn House Office Building
Washington, D.C. 20515

Copy Furnished:
The Honorable Joseph Courtney
United States Representatives
55 Main Street, Suite 250
Norwich, CT 06360

The Honorable Joseph Courtney
United States Representative
77 Hazard Avenue, Unit J
Enfield, CT 06082

The Honorable Rosa DeLauro
United States House of Representatives
2413 Rayburn House Office Building
Washington, D.C. 20515

Copy Furnished:
The Honorable Rosa DeLauro
United States Representative
59 Elm Street
New Haven, CT 06510

The Honorable James Himes
United States House of Representatives
119 Cannon House Office Building
Washington, D.C. 20515

Copy Furnished:
The Honorable James Himes
United State Representative
211 State Street, 2nd Floor
Bridgeport, CT 06604

The Honorable James Himes
United State Representative
888 Washington Boulevard, 10th Floor
Stamford, CT 06901

The Honorable Elizabeth Esty
United States House of Representatives
509 Cannon House Office Building
Washington, D.C. 20515

Copy Furnished:
The Honorable Elizabeth Esty
United States Representative
114 West Main Street
Old Post Office Plaza, LLC
New Britain, CT 06051

The Honorable Charles E. Schumer
United States Senate
322 Hart Senate Office Building
Washington, D.C. 20510

Copy Furnished:
The Honorable Charles E. Schumer
United States Senate
780 Third Avenue, Suite 2301
New York, NY 10017

The Honorable Kirsten Gillibrand
United States Senate
478 Russell
Washington, DC 20510

Copy Furnished:
The Honorable Kirsten Gillibrand
United States Senate
780 Third Avenue, Suite 2601
New York, New York 10017

The Honorable Lee Zeldin
United States House of Representatives
1517 Longworth House Office Building
Washington, DC 20515

Copy Furnished:
The Honorable Lee Zeldin
United States Representative
31 Oak Street, Suite 20
Patchogue, NY 11772

The Honorable Steve Israel
United States House of Representatives
2457 Rayburn House Office Building
Washington, DC 20515

Copy Furnished:
The Honorable Steve Israel
United States Representative
534 Broad Hollow Road, Suite 302
Melville, NY 11747

The Honorable Joseph Crowley
United States House of Representatives
1436 Longworth House Office Building
Washington, D.C. 20515

Copy Furnished:
The Honorable Joseph Crowley
United States Representative
82-11 37th Avenue, Suite 402
Queens, NY 11372

The Honorable Eliot L. Engel
United States House of Representatives
2462 Rayburn House Office Building
Washington, DC 20515

Copy Furnished:
The Honorable Eliot L. Engel
United States Representative
6 Gramatan Avenue, Suite 205
Mt. Vernon, NY 10550

The Honorable Nita Lowey
United States House of Representatives
2365 Rayburn House Office Building
Washington, DC 20515

Copy Furnished:
The Honorable Nita Lowey
United States Representative
67 North Main Street, #101
New City, NY 10956

The Honorable Gina M. Raimondo
Governor of Rhode Island
82 Smith Street
Providence, RI 02903

The Honorable Jack Reed
United States Senate
728 Hart Senate Office Building
Washington, DC 20510

Copy Furnished:
The Honorable Jack Reed
United States Senate
U.S. District Courthouse
One Exchange Terrace, Suite 408
Providence, RI 02903-1744

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

The Honorable Sheldon Whitehouse
United States Senate
Hart Senate Office Bldg. Room 530
Washington, DC, 20510

Copy Furnished:
The Honorable Sheldon Whitehouse
United States Senate
170 Westminster St. Suite 1100
Providence, RI, 02903

The Honorable James Langevin
United State House of Representatives
109 Cannon House Office Building
Washington, DC 20515

Copy Furnished:
The Honorable James Langevin
United State Representative
300 Centerville Rd, Suite 200 South
Warwick, RI 02886



DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS, NORTH ATLANTIC DIVISION
FORT HAMILTON MILITARY COMMUNITY
302 GENERAL LEE AVENUE
BROOKLYN NY 11252-6700

CENAD-PD

11 December 2015

MEMORANDUM FOR Commander, US Army Corps of Engineers, New England District (CENAE-PP-C), 696 Virginia Road, Concord, MA 01742-2752

SUBJECT: Long Island Sound Dredged Material Management Plan (DMMP) and Programmatic Environmental Impact Statement (PEIS), Concurrence with Response to Review Comments and Approval to Publish Final Report

1. Reference:

a. Memorandum, CENAE-PP, 30 November 2015, subject: Long Island Sound Dredged Material Management Plan (DMMP) and Programmatic Environmental Impact Statement (PEIS), Response to NAD Review Comments and Request for Approval to Publish the Final Report

2. We concur with NAE's responses per Reference 1.a, as further amended by NAE on 2 December 2015. We also concur with the draft final DMMP/PEIS per Reference 1.a, as amended by NAD's comments already provided to the District.

3. The District's request for approval to publish the final DMMP/PEIS is granted. The distribution of the final DMMP/PEIS, including publication of the Public Notice, is delegated to the District and is to occur no later than 31 December 2015. Additionally, the District shall file the final PEIS with the U.S. EPA no later than 31 December 2015.

4. The points of contact are Mr. Rich Thorsen, P.E., CENAD-PD-OR, who may be reached at 347-370-4608, and Ms. Naomi Fraenkel, CENAD-PD-PL, who may be reached at 917-790-8615.

A handwritten signature in black ink, reading "David J. Leach", is positioned above the printed name.

DAVID J. LEACH, P.E., SES
Director of Programs



DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT
696 VIRGINIA ROAD
CONCORD MA 01742-2751

CENAE-PP

30 November 2015

MEMORANDUM FOR Commander, U.S. Army Corps of Engineers, North Atlantic Division, CENAD-CWID-P, (Ms. Linda Monte), Fort Hamilton Military Community, Bldg 301, General Lee Avenue, Brooklyn, New York 11252-6700

SUBJECT: Long Island Sound Dredged Material Management Plan (DMMP) and Programmatic Environmental Impact Statement (PEIS), Response to NAD Review Comments and Request for Approval to Publish the Final Report.

1. In accordance with the Project Review Plan (PRP) approved by NAD on 20 February 2015, enclosed are the District's responses to NAD comments of 10 November 2015 on the draft DMMP and PEIS.
2. Also enclosed are eight copies of a compact disk containing the subject draft final report documents with track-change edits to facilitate MSC review. These include the following:
 - (a) Edited Final DMMP (With Track Changes).
 - (b) Edited Final PEIS (With Track Changes).
 - (c) Appendix A – Public Involvement – with all agency and public comment letters.
 - (d) DMMP/PEIS Appendices (B through J).
 - (e) Supporting technical investigation reports for DMMP/PEIS (#1 through #14).
 - (f) Original NAD comments and NAE response comment table to NAD.
3. In order to maintain the project schedule for completion of a final DMMP/PEIS by 31 December 2015, we request the MSC concurrence with the District's responses, and approval to publish the final DMMP/PEIS no later than 15 December 2015. We also understand that the District will be preparing the Congressional and agency transmittal letters and notices for MSC signature.
4. If you have any questions or require further information, please contact the Project Manager, Ms. Meghan Quinn, who may be reached at 978-318-8179 or via email at: meghan.c.quinn@usace.army.mil.

Encls


WILLIAM C. SCULLY, P.E.
Deputy District Engineer
for Project Management



DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS, NORTH ATLANTIC DIVISION
FORT HAMILTON MILITARY COMMUNITY
302 GENERAL LEE AVENUE
BROOKLYN NY 11252-6700

CENAD-PD

10 November 2015

MEMORANDUM FOR Commander, US Army Corps of Engineers, New England District
(CENAE-PP-C), 696 Virginia Road, Concord, MA 01742-2752

SUBJECT: Long Island Sound Dredged Material Management Plan and
Programmatic Environmental Impact Statement - Long Island Sound, Connecticut,
New York and Rhode Island (Draft), dated August 2015

1. Reference is made to the CENAE-EPW (M. Quinn) email of 21 August 2015 requesting review of the subject document.
2. Enclosed are the Division's review comments, which were already provided to your staff on 30 September 2015 and discussed with them via telephone conference on 2 October 2015.
4. The points of contact are Ms. Naomi Fraenkel, CENAD-PD-PL, who may be reached 917-790-8615 and Mr. Rich Thorsen, P.E., CENAD-PD-OR, who may be reached at 347-370-4608.

A handwritten signature in black ink, appearing to read "David J. Leach", is positioned above the printed name.

DAVID J. LEACH, P.E., SES
Director of Programs

Encl

APPENDIX A

Part 1B

**State and Agency Coordination Letters
Received After Closure of the Public Review Period
and During Preparation of the Final DMMP/PEIS**

STATE OF NEW YORK
DEPARTMENT OF STATE

ONE COMMERCE PLAZA
99 WASHINGTON AVENUE
ALBANY, NY 12231-0001
WWW.DOS.NY.GOV

ANDREW M. CUOMO
GOVERNOR

CESAR A. PERALES
SECRETARY OF STATE

November 4, 2015

Christopher J. Barron
Colonel, District Engineer
U.S. Department of the Army
Corps of Engineers / New England District
696 Virginia Road
Concord, Massachusetts 01742

Re: O-2015-0025 - U.S. Army Corps preparation of a
Dredged Material Management Plan (DMMP) and Programmatic
Environmental Impact Statement (PEIS) for the Long
Island Sound Region.

Intent to Review

Dear Mr. Barron,

The New York State Department of State (Department) has provided comment to the U.S. Army Corps of Engineers - New England District (Corps) on both its advanced technical review (ATR) copy of the pre-draft DMMP and the public draft DMMP, on July 10 and October 16, 2015, respectively. In these letters, the Department alerted the Corps of its obligation to submit a consistency determination to the Department for its review of the DMMP for conformance with New York State's coastal policies. On October 21, 2015, the Department received a letter from the Corps indicating that the Corps believes that the DMMP is not a federal agency activity subject to federal consistency review and that, therefore, a consistency determination will not be submitted for this activity.

In the October 21 letter, the Corps states that its decision not to submit a consistency determination hinges on its belief that the DMMP does not "direct any agency actions" and is "more a study or a guide providing data or analysis for future projects." Further, the Corps explained that "any determination of reasonably foreseeable coastal effects of future actions would be premature and speculative at the DMMP stage."¹ However, the Department believes that NOAA's, EPA's, and the Corps' own Engineering Regulations (ER) make clear that the LIS DMMP is exactly the type of Federal agency action that is required to be reviewed for consistency with the States' coastal policies pursuant to the Coastal Zone Management Act (CZMA).²

In fact, Congress has clarified that federal agency planning documents are subject to federal consistency review,³ and the Corps itself has developed regulations clarifying that DMMPs developed pursuant to the Corps' regulation ER

¹ See letter dated October 21, 2015 from Colonel Christopher J. Barron, U.S. Corps of Engineers, District Engineer to Sandra Allen, Esq. Deputy Secretary of State, Office of Planning & Development, NYS Department of State.

² See 15 C.F.R. § 930.31(a).

³ The Coastal Zone Act Reauthorization Amendments of 1990 (CZARA) (Pub. L. No. 101-508) amended the CZMA to clarify that the federal consistency requirement applies when any federal activity, regardless of location, affects any land or water use or natural resource of the coastal zone. The "reasonably foreseeable effects" test established "a generally applicable rule of law that any federal agency activity (regardless of its location) is subject to [the consistency requirement] if it will affect any natural resources, land uses, or water uses in the coastal zone. No federal agency activities are exempt from this requirement." H.R. Conf. Rep. No. 964, 101st Cong., 2d Sess. 968-975, 970. See also, 15 C.F.R. § 930.11(g) (Whether an activity is "affecting" the coastal zone is to be construed

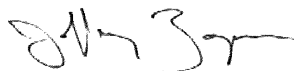
1105-2-100, such as the LIS DMMP, are to be reviewed for consistency with States' coastal policies.⁴ In fact, at least 3 other DMMPs developed in accordance with ER 1105-2-100 have undergone federal consistency review.⁵ In line with this current practice, the Department believes that the Corps should not create an exception for the LIS DMMP, which will go far beyond the standard 20-year DMMP time period and establish the basis for decision-making for the disposal of dredged materials in the Sound for the next 30 years.

In addition to directing a large number of dredged material disposal projects for years to come, the LIS DMMP goes farther than most DMMPs because it was designed to specifically establish the procedures and standards that would permit the continued use, on a permanent basis, of the Central and Western Disposal Sites. Notably, the EPA Rule that established the LIS DMMP specifies that "disposal of dredged material at [Central and Western Disposal Sites] shall be allowed only from permittees that comply with procedures and standards consistent with the recommendations of the DMMP".⁶ Finally, the 2007 Project Management Plan that guided the development of the LIS DMMP states that, "[s]pecifically, the LIS DMMP and the PEIS Record of Decision (ROD) will constitute the *complete decision documents* which will be used for dredged material management of future Corps navigation projects in and around Long Island Sound."⁷

In light of these federal statutes and regulations, as well as documents that have governed the development of the LIS DMMP, the Department has determined that the completion of the LIS DMMP is a federal agency activity within New York and Connecticut waters that will have reasonably foreseeable effects on uses and resources in New York's coastal area and has concluded that the DMMP should be reviewed for consistency with New York State's coastal policies. The Department, therefore, requests that the Corps submit a consistency determination for the DMMP to this Department, in accordance with the CZMA implementing regulations in 15 CFR 930 Subpart C, and Part II Section 9 and Tables 2 and 2a of the NYCMP. As the Corps is seeking to publish the final DMMP by December 28, 2015, the determination is already late,⁸ and must be submitted to the Department as soon as possible, but in any event prior to the Corps' decision to proceed with the publication of the final DMMP.

If you have any questions or would like to discuss these matters further, please contact me at (518) 473-2476, or by email at Jeffrey.Zappieri@dos.ny.gov.

Sincerely,



Jeffrey Zappieri
Supervisor, Consistency Review Unit
Office of Planning and Development

broadly to "include both direct effects which result from the activity and occur at the same time and place as the activity, and indirect (cumulative and secondary) effects which result from the activity and are later in time or farther removed in distance, but are still reasonably foreseeable."); 5 Fed. Reg. 77130 ("[A] planning document or regulation prepared by a Federal agency would be subject to the federal consistency requirement if coastal effects from those activities are reasonably foreseeable.")

⁴ The Corps' development of DMMPs for the Nation's ports are management plans that are subject to federal consistency review with the affected State's CMP. See ER 1105-2-100, Appendix E.

⁵ See Draft Dredged Material Management Plan, Port Royal Sound, South Carolina to Cumberland, Georgia [March 2014], Appendix C: South Carolina Coastal Consistency Determination (CZM), available at:

<http://www.sas.usace.army.mil/Portals/61/docs/Planning/Plansandreports/AIWW/C.pdf>; see also Calcasieu River and Pass Dredged Material Management Plan and Supplemental Environmental Impact Statement, Cameron Parish, Louisiana, Appendix K: CZMA Consistency Determination, [November 22, 2010], available at:

<http://www2.mvn.usace.army.mil/pd/projectslist/ProjectData/108769/reports/Appendix%20K-CZMDetermination.pdf>.

Draft Integrated Dredged Material Management Plan and Environmental Impact Statement, Morehead City Harbor, Morehead City, NC, [October 2013], available at:

http://www.saw.usace.army.mil/Portals/59/docs/navigation/Dredging/Projects/Compressed_Report_for_Posting_to_Corps_Website.pdf

⁶ 40 C.F.R. § 228.15(b)(4)(vi)(G)

⁷ Project Management Plan for the Regional Dredged Material Management Plan and Programmatic Environmental Impact Statement, [October 2007] (emphasis added).

Cc: OCM/NOAA – John King
OCM/NOAA – David Kaiser
OCM/NOAA – Kerry Kehoe
NYSDEC Region 1 – Roger Evans
NYSDEC Bureau of Marine Resources – Dawn McReynolds
NYSDEC Region 2 – Steve Watts
NYSDEC Region 3 – Daniel Whitehead
COE/New York District – Jodi McDonald



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

REPLY TO
ATTENTION OF

OCT 21 2015

The Honorable Tim Ackert
Connecticut House of Representatives
Legislative Office Building, Room 4200
Hartford, Connecticut 06106-1591

Dear Representative Ackert:

Thank you for your letter to Lieutenant General Thomas Bostick, dated October 1, 2015, regarding the Connecticut General Assembly support for the Long Island Sound Dredged Material Management Plan (DMMP) and the Programmatic Environmental Impact Statement (PEIS). The Governors of New York and Connecticut, and the U.S. Environmental Protection Agency asked the Corps to develop a region-wide dredged material management plan for Long Island Sound. The Corps, our non-federal sponsor, the DMMP Regional Steering Committee, dozens of stakeholders, and the public have worked diligently to develop potential alternatives for more than 140 federal and non-federal projects ongoing and projected in the region for the next 30 years. This plan not only continues to support the vital strategic and economic importance of the region, but also provides recommendations for the security and protection of our waterways and lands.

The public review period for the Draft DMMP/PEIS closed on October 16, 2015. We will review all input received and evaluate the need to modify the document as expeditiously as possible.

Thank you for your continued support in the Corps Civil Works program. I am sending an identical letter to the Connecticut State Senators and Representatives that also signed your letter. If you have additional questions or concerns, please contact me or have a member of your staff contact Ms. Catherine Shuman, Deputy Chief, North Atlantic Division Regional Integration Team, at (202) 761-1379.

Sincerely,

Steven L. Stockton, P.E.
Director of Civil Works

A-1B-4



DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT
696 VIRGINIA ROAD
CONCORD MA 01742-2751

October 21, 2015

Programs and Project Management Division
Civil/IIS Project Management Branch

Ms. Sandra Allen, Esq - NYDOS
Deputy Secretary of State
Office of Planning & Development
One Commerce Plaza
99 Washington Avenue
Albany, NY 12231-0001

Dear Ms. Allen:

I am writing in response to your letter dated October 9, 2015 relating to the Long Island Sound Draft Dredged Material Management Plan and Draft Programmatic Environmental Impact Statement. This response follows our October 15, 2015 response letter that addressed only the end of the public comment period.

Congressional designation of Long Island Sound as an "estuary of national significance" means that LIS has been selected to be part of EPA's National Estuary Program, and therefore eligible for Federal funding under section 320 of the Clean Water Act. Those funds have been used to establish the LIS Study office, support investigations of the Sound, and engage agencies and the public in those efforts. Inclusion of LIS in the National Estuary Program does not prohibit other uses, such as open water placement of dredged material, as long as that placement is conducted in an environmentally protective manner, which current practices of sediment testing, site identification, management and monitoring ensure. Dredged material placement in LIS is not inconsistent with the Sound's national significance designation.


Although the 2005 letter from the Governors of New York and Connecticut requested the DMMP focus, among other matters, on the reduction of sediment and contaminant loadings, Major General Don Riley, responded to their letter (both attached), stating that evaluating the reduction in sediment sources and contaminant loading is beyond the scope that can be funded as part of a Corps DMMP. Thus, the States were given the option to provide non-Federal funding to perform these studies, or to perform these studies themselves. After nearly three years of Steering Committee meeting discussions of this topic, the States and EPA decided to work together to gather the necessary information and prepare a report on these issues. The information provided in this DMMP on sediment and contaminant reduction is from the report provided by EPA, which is included as an appendix to the DMMP.

Lastly, the Corps will not be submitting a CZMA consistency determination for this DMMP to either of the three states. The LIS DMMP does not recommend specific dredged material placement solutions for specific Federal Navigation Project activities, the activities of other Federal agencies, or Federal decisions on the regulated activities of non-Federal parties, nor does it "direct" future agency actions. Rather it is intended to serve as a resource to inform future dredging projects of various alternatives that should be evaluated in developing a recommended plan of action. As such, it does not constitute "a proposal for action," initiating activities where coastal effects are reasonably foreseeable, and therefore is not a "Federal agency activity" as defined in 15 CFR 930.31(a) that would require a CZMA consistency determination. In effect, even though it is called a "plan", the LIS DMMP is more a study or guide providing data and analysis to be considered by future projects, but contains no proposal for Federal action and any determination of reasonably foreseeable coastal effects of future actions would be premature and speculative at the DMMP stage.

Although the DMMP itself does not constitute a Federal agency activity requiring a consistency determination, future projects within the LIS DMMP study area will still need to comply with the CZMA and other State/Federal statutory and regulatory requirements on a project-by-project basis. The LIS DMMP is not intended to circumvent those regulatory processes.

If you have any questions or comments, please feel free to contact me at (978) 318-8220, or Ms. Meghan Quinn, Project Manager, at (978) 318-8179.

Sincerely,



Christopher J. Barron
Colonel, Corps of Engineers
District Engineer

Enclosure

Same letter sent to:

Ms. Kathleen Moser-NYDEC
Assistant Commissioner
Office of Natural Resources
625 Broadway, 14th Floor
Albany, NY 12233-1010

Copies Furnished:

Brigadier General William Graham
U.S. Army Corps of Engineers – NAD
Fort Hamilton Military Community
302 General Lee Avenue
Brooklyn, New York 11252

Colonel David Caldwell
U.S. Army Corps of Engineers – NAN
26 Federal Plaza
New York, NY 10278

Mr. Curtis Spaulding
Environmental Protection Agency - Region 1
5 Post Office Square #100
Boston, MA 02109

Ms. Judith Enck
Environmental Protection Agency - Region 2
290 Broadway
New York, NY 10007-1866

Mr. Rob Klee
CT Dept of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127



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

REPLY TO
ATTENTION OF

OCT 17 2015

The Honorable Richard Blumenthal
United States Senate
706 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator Blumenthal:

Thank you for your letter to Lieutenant General Thomas Bostick, dated September 1, 2015, regarding the Connecticut delegation support for the Long Island Sound Dredged Material Management Plan (DMMP) and the Programmatic Environmental Impact Statement (PEIS). The Governors of New York and Connecticut, and the U.S. Environmental Protection Agency asked the Corps to develop a region-wide dredged material management plan for Long Island Sound. The Corps, our non-federal sponsor, the DMMP Regional Steering Committee, dozens of stakeholders, and the public have worked diligently to develop potential alternatives for more than 140 federal and non-federal projects ongoing and projected in the region for the next 30 years. This plan not only continues to support the vital strategic and economic importance of the region, but also provides recommendations for the security and protection of our waterways and lands.

The public review period for the Draft DMMP/PEIS closed on October 16, 2015. We will review all input received and evaluate the need to modify the document as expeditiously as possible.

Thank you for your continued support in the Corps Civil Works program. I am sending an identical letter to Senator Murphy, and Representatives Courtney, DeLauro, Himes, Esty and Larson. If you have additional questions or concerns, please contact me or have a member of your staff contact Ms. Catherine Shuman, Deputy Chief, North Atlantic Division Regional Integration Team, at (202) 761-1379.

Sincerely,

Steven L. Stockton, P.E.
Director of Civil Works

A-1B-8

Same Letter Sent To:

The Honorable Richard Blumenthal
United States Senate
706 Hart Senate Office Building
Washington, D.C. 20510

The Honorable Christopher S. Murphy
United States Senate
136 Hart Senate Office Building
Washington, D.C. 20510

The Honorable Joe Courtney
United States House of Representatives
2348 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Rosa DeLauro
United States House of Representatives
2413 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Elizabeth Esty
United States House of Representatives
405 Cannon House Office Building
Washington, D.C. 20515

The Honorable James Hines
United States House of Representatives
1227 Longworth House Office Building
Washington, D.C. 20515

The Honorable John Larson
United States House of Representatives
1501 Longworth House Office Building
Washington, D.C. 20515

