



STATE OF MISSISSIPPI
OFFICE OF THE GOVERNOR

IALEY BARBOUR
GOVERNOR

July 31, 2009

Mr. Theodore A. Brown, P.E.
Chief, Planning and Policy Division
Directorate of Civil Works
U. S. Army Corps of Engineers
441 G Street NW
Washington, D.C. 20314-1000

Dear Mr. Brown:

Reference is made to your letter of June 29, 2009, requesting the position of the State of Mississippi with regards to the Mississippi Coastal Improvements Program, Hancock, Harrison, and Jackson Counties, Mississippi and specifically to the proposed report of the Chief of Engineers. The State of Mississippi (State) fully supports the implementation of the Comprehensive Plan as developed by the District's Mississippi Coastal Improvements Program (MsCIP) team over the past three years. In particular, we support the thirteen comprehensive plan features recommended for construction as described in Chapter 5 of the final report dated June 2009. In addition, the State strongly supports the need to include freshwater diversion from the Mississippi River as authorized by the Water Resources Development Act of 2007 as an integral part of the comprehensive plan. Secondly, the State supports the continued evaluation of those features that are recommended for additional feasibility level studies; particularly the six environmental restoration projects identified properties within the Mississippi Coastal Preserves Program. All appropriate agencies of the State have reviewed the report and found that the recommendations are consistent with State laws and policies and are in full agreement with the State's comprehensive restoration goals.

As confirmed in the Comprehensive Plan, the physical and economic destruction to the State of Mississippi brought by Hurricane Katrina was on a scale unmatched by any natural disaster in U.S. history. The natural landscape of Mississippi suffered severe damage and nearly all our coastal communities along the Gulf of Mexico were completely devastated or seriously damaged. The impact of this disaster is still being felt by these communities and the entire northern Gulf of Mexico region today, almost four years after the hurricane. The activities recommended by the Corps in the Mississippi Coastal Improvements Program Interim Report (June 2006) and authorized by Congress have begun and will provide a basis for our continued redevelopment towards a resilient coastal Mississippi. I appreciate the efforts of the Army Corps of Engineers to expeditiously develop this comprehensive plan and express the strong support of the State toward the implementation of this plan.

Page 2

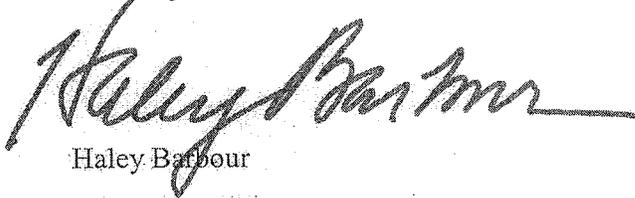
July 31, 2009

The State is legally capable of fulfilling the requirement for being the local sponsor for this program in accordance with Section 21 of the Flood Control Act of 1970, as amended (Public Law 91-611). This letter, while not legally binding on the State in any way and not an obligation of future funds appropriated by the State Legislature, voices and demonstrates our support for the Mississippi Coastal Improvements Program Comprehensive Plan. However, we believe there is a need for further discussions and modifications related to the standard cost sharing requirements as described in the report. Hurricane Katrina was not a standard event and the devastation was unmatched. It is our intent to request of Congress that the cost share for the implementation of the comprehensive plan features by the Corps of Engineers be in line with other Federal disaster relief (100% Federal share), due to the unprecedented nature of the disaster and the continuing impact it has had on the economic base of these communities and the State.

We look forward to our continued working relationship with the U.S. Army Corps of Engineers on this unprecedented effort towards making coastal Mississippi more resilient to future hurricane related events.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Haley Barbour", with a horizontal line extending from the end of the signature.

Haley Barbour

HB/mb



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

JUL 30 2009

9043.1
PEP/NRM

ER 09/673

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

RE: Thirty-Day Review of the Chief of Engineers Proposed Report, On
The Mississippi Coastal Improvements Program (MsCIP),
Hancock, Harrison, and Jackson Counties, MS

Dear Mr. Brown:

The U.S. Department of the Interior (Department) has reviewed the U.S. Army Corps of Engineers (USACE), Chief of Engineers Proposed Report and supporting documents on the Mississippi Coastal Improvements Program (MsCIP).

Our U.S. Fish and Wildlife Service (Service) has been a full and cooperating member of the MsCIP planning team. We appreciate your consideration of their comments and recommendations during the advanced planning stages of the program. The Service believes that three of the recommended program features for ecosystem restoration, Dantzler, Franklin Creek, and Bayou Cumbest would potentially complement refuge goals at the Mississippi Sandhill Crane National Wildlife Refuge (NWR) and Grand Bay NWR.

The Department does not object to the Chief of Engineers Proposed Report. However, we do wish to provide the following comments developed by our National Park Service (NPS) for your consideration.

General Comments

Development of a Supplemental Environmental Impact Statement (SEIS) Prior to Barrier Island Restoration

Specific Comments

Main report

1. Table 6-1 shows a non-Federal cost share of \$180 million for barrier island restoration. Is this non-Federal cost share an accurate number, and what non-Federal entities will be participating in such cost sharing?

Appendix E: Engineering

1. p. 226, line 17 – change “George” to “Georges”
2. p. 230, line 5 and p. 264, line 24 – change “8 million cubic yards” to “13 million cubic yards”
3. p. 234, line 17 – change “Isalnd” to “Island”
4. p. 235, line 12 -- states that islands have lost 20-25% of their land masses since pre-Camille times, this seems to be an underestimate.

Appendix H: Barrier Islands

1. p. 34, line 2 – recommends using sand dredged from Ship Island Pass for filling Camille Cut and littoral zone placement
2. p. 35, line 4 – states that “inland sources of sand exist that will be used for ... restoration.”
3. p. 52, line 9 – “The source of these sands may be from inland sources or offshore borrow areas”
4. p. 56, line 14 – states that islands have lost 20-25% of their land masses since pre-Camille times, this seems to be an underestimate
5. p. 40, line 3 – change “week” to “weak”
6. p. 40, line 5 – when describing an experiment, says “I used ...” but does not identify the narrator.
7. p. 44, line 12 – change “past” to “passed”
8. p. 44, line 17 and p. 56, line 16 – change “George” to “Georges”
9. p. 47, line 22 and p. 48, line 13 – change “Camille Pass” to “Camille Cut”
10. p. 52, line 13 – change “affect” to “effect”
11. p. 62, line 32 – change “tracts” to “tracks”

In a discussion that took place on July 24, 2009, between the USACE (MsCIP Program Manager, Dr. Susan Rees) and the NPS, both agreed to proceed with the preparation of a SEIS that would tier from the Programmatic Environmental Impact Statement (EIS) to provide a more detailed evaluation of the environmental impacts with regard to the barrier island restoration component of the MsCIP. The NPS proposes to work closely with the USACE, through its status as a cooperating agency (as requested in its previous comments on the Draft Programmatic EIS), to expedite the development of the SEIS.

Cat Island

The NPS finds that the USACE responded favorably to the vast majority of comments and recommendations submitted by the NPS on the Draft MsCIP Comprehensive Plan and Integrated Programmatic EIS. However, the NPS notes that the Final MsCIP Comprehensive Plan and Integrated Programmatic EIS now includes several figures (see pg. S-9, Figure 4.1, Figure 5-1 and Figure 7-3) which show a littoral zone sand deposition area near Cat Island under the Comprehensive Barrier Island Restoration Alternative H. Littoral zone placement of sand near Cat Island was not a component of Alternative H due to the paucity of scientific information supporting such placement. As stated on pg. 5-32 of the Main Report:

This alternative includes the direct placement of sandy sediments to fill the breach in Ship Island and thereby reconnect West and East Ship Islands to their historic condition and to place sandy sediments within the littoral zones of Ship, Horn and Petit Bois Islands to ensure that the sediment budget of the islands is sufficient to maintain the islands in the future. This littoral zone placement would also benefit from the modification of dredging and disposal practices of the federally maintained Gulfport and Pascagoula Harbor navigation projects. These coupled efforts would begin the long-term process of barrier island repair and sustainability. Another consideration that still must be addressed is the best alternative for dealing with the erosion of Cat Island. This island is geomorphically different from the other three barrier islands and our understanding of the processes controlling Cat Island is not well developed. Additional effort would be required to add this island into an overall comprehensive barrier island restoration plan.

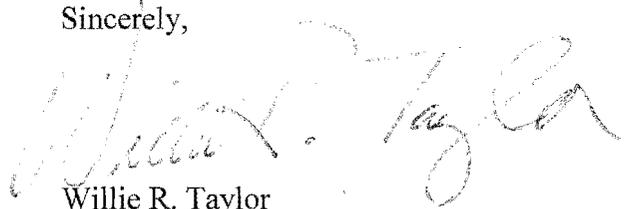
The NPS suggests that it is premature to include a littoral zone deposition area near Cat Island in the absence of supporting scientific data.

Environmental Effects to Geology

The NPS also notes that Table S-2 (pg. S-14), Environmental Effects of Recommended Alternatives, continues to show “no impact” to geology under the Comprehensive Barrier Island Restoration Alternative H. While we understand that the USACE narrowly defines “geology” as pertaining to geologic formations on the mainland, restoration of the barrier island sand budget and transport system would likely benefit coastal geologic processes. The NPS recommends that this important beneficial impact issue be raised in the SEIS process.

We appreciate the opportunity to review the Chief's Proposed Report and supporting documents. We look forward to working with the USACE in the preparation of a SEIS, and any subsequent activities including detailed planning and implementation phases of the NWR areas mentioned above, including long-term management. If you have any questions regarding these comments please contact Mr. Jerry Ziewitz, Fish and Wildlife Service, Southeast Region Conservation Planning Assistance Coordinator, at 850-769-0552x223 or Mr. Steven Wright, National Park Service, Southeast Regional Office, Planning and Compliance, at 404-507-5710.

Sincerely,

A handwritten signature in cursive script, appearing to read "Willie R. Taylor".

Willie R. Taylor
Director, Office of Environmental Policy
and Compliance

From: [Bee, Patricia L HQ02](#)
To: [Hughes, Thomas E HQ02](#); [Redican, Joseph H HQ02](#); [Ware, Charles L HQ02](#); [Lucyshyn, John HQ02](#); [Matusiak, Mark HQ02](#)
Subject: FW: Mississippi Coastal Improvement Program EIS
Date: Wednesday, August 12, 2009 11:10:04 AM

DOT/FHWA MS response below.

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

From: claiborne.barnwell@dot.gov [<mailto:claiborne.barnwell@dot.gov>]
Sent: Wednesday, August 12, 2009 9:58 AM
To: Bee, Patricia L HQ02
Cc: Bethaney.Bacher-Gresock@dot.gov; Donald.Davis@dot.gov; Dickie.Walters@dot.gov
Subject: Mississippi Coastal Improvement Program EIS

Patricia,
FHWA-MS has the following comments/observations on the MsCIP FEIS:

Transportation issues comprised only a minor focus of the comprehensive plan dealing with water resources associated with hurricane and storm damage risk reduction. The proposals for both structural and non-structural risk reduction along with restoration features offer the opportunity for ecological recovery and disaster preparedness. The plan contains a long-term blueprint addressing critical needs for coastal Mississippi's ecological wellbeing and is consistent with our planned transportation programs.

FHWA-MS in conjunction with the Mississippi Department of Transportation (MDOT) has been engaged in the development of a transportation project that falls with the MsCIP study area. MDOT prepared an Environmental Assessment and was issued a FONSI in 2003 for a highway connecting the Port of Gulfport to Interstate 10. This study began in the mid 1990's and MDOT is currently working with USACE-Mobile and EPA-Atlanta for the approval of a 404 Permit within the Turkey Creek watershed. The proposed mitigation for the wetland impacts includes the purchase of more than 1,600 acres within the watershed, a recommendation of the MsCIP Comprehensive Plan, to further the restoration of water quality and reduce the damage from future hurricane and storm events.

Please call should you need further documentation.

With best regards:

E. Claiborne Barnwell, P.E.

Project Development Team Leader

FHWA Mississippi Division

tele: 601.965.4217

cell: 601.259.9085

claiborne.barnwell@dot.gov <<mailto:claiborne.barnwell@dot.gov>>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

July 27, 2009

Dr. Susan I. Rees
Project Manager
U.S. Army Corps of Engineers
Mobile District
P.O. Box 2288
Mobile, AL 36628-0001

Subject: EPA's NEPA Review of the COE's Final Integrated Programmatic Environmental Impact Statement (FPEIS) for the "Mississippi Coastal Improvements Program (MsCIP)"; Recommended Comprehensive Plan; June 2009; Hancock, Harrison, and Jackson Co, MS; CEQ# 20090216; ERP# COE-E39075-MS

Dear Dr. Rees:

Pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) Region 4 has reviewed the U.S. Army Corps of Engineers' (COE: Mobile District) Final Comprehensive Plan and Integrated Programmatic Environmental Impact Statement (FPEIS = Recommended Comprehensive Plan). The FPEIS consists of a main document and ten appendices (A-L). As a Cooperating Agency, EPA has participated in various meetings and site visits preceding the issuance of this FPEIS. These included Regional Coordination Meetings for scoping in 2006, Risk Analysis Workshops in 2007, a web-based feedback and participation forum in 2007, and wetland field reconnaissance site visits and interagency project deliberations. These meetings and site visits were attended by representatives of our Water Protection Division (WPD) and NEPA Program Office (NPO). We also provided NEPA comments on the Draft PEIS (DPEIS) in a letter dated March 27, 2009.

As we indicated in our DPEIS comment letter, we commend the COE for their extensive scoping, planning and coordination of this project with federal, state and local agencies as well as non-governmental organizations (NGOs), universities, stakeholders and the general public. Moreover, we also appreciate the project status briefings presented by the COE's South Atlantic Division (SAD) and the coordination provided by EPA's Office of Water in Washington, DC and our Gulf of Mexico Program (GMP) in Mississippi.

Project Overview

The Recommended Comprehensive Plan addresses recent (2005-2006) hurricane and storm damage (Katrina, Rita and Cindy) in Hancock, Harrison, and Jackson Counties

through the implementation of several projects and the further study and NEPA review of others. Specifically, we note the study of ecosystem restoration of wetlands, fish and wildlife preservation, eroded coastlines and saltwater intrusion; the purchase or flood-proofing of properties in high hazard zones to change their land use; and the policy that reduction measures for hurricane/storm damage were provided "...without encouraging re-development in high-risk areas" (pg. S-5 of Main Document/hard copy). EPA supports the restoration goals of the MsCIP and the overall approach to achieve them taken by the Mobile District. We concur with the MsCIP objective to recommend solutions that "...are intended to render the region more resilient and less susceptible to the recurrence of damages from future coastal storm events" (pg. S-5).

COE Responses to EPA's DPEIS Comments

The Mobile District's responses to EPA's NEPA comments on the DPEIS are found in Appendix L. We appreciate that the COE's direct response to our comments as opposed to bundling similar public comments together for response. On the compact disc (CD) provided for Appendix L, we note that our letter is located on page 32 of 222, and the COE's responses to that letter on page 50 of 222.

Overall, we agree with most of the Mobile District's responses, although they included a few non-concurrences. These areas of non-concurrence involved saltwater intrusion and Section 404 permitting decisions in COE and Federal Emergency Management Agency (FEMA) designated high-risk areas along the Mississippi Gulf Coast. We offer the following final comments on selected COE responses for consideration in the COE's Record of Decision (ROD):

* Comment Responses 2 & 16 (*Emphasis on Restoration Projects*) – The Mobile District does not concur with our comment to emphasize post-hurricane restoration for the Mississippi coastline more so than other regional ecosystem projects that are not the direct result of hurricane damage. While EPA is aware of the Congressional authorization to study saltwater intrusion (and clearly expects the COE to be responsive to such mandates), we believe that hurricane-induced saltwater intrusion issues are less pronounced for the Mississippi coastal mainland relative to other storm-affected regions such as neighboring Louisiana (also see Comment Responses 10 & 18 for *Saltwater Intrusion* below). Although we continue to maintain that the emphasis should be placed on post-hurricane restoration, we understand that the referenced freshwater diversion study originating in Violet, Louisiana could be beneficial to diluting the elevated salinities of the Mississippi Sound (that were increased by hurricane erosion of the barrier islands) to the more ambient, lower salinities more characteristic of the Sound.

* Comment Response 3 (*Non-Structural Alternatives*) – EPA's DPEIS comments supporting non-structural alternatives to restore the Mississippi coast where appropriate resulted in a "comment noted" response. Although discretionary, this comment provided an excellent opportunity for the District to underscore the COE's intent to implement non-structural alternatives within MsCIP where appropriate. Nevertheless, we are pleased to note from the Main Document (pg. 5-3) that the non-structural features listed

in the DPEIS (Draft Comprehensive Plan) is consistent with the Recommended Comprehensive Plan in the FPEIS. However, we also note that this COE response does not address our suggestion to establish coastal greenspace (greenways/parks) as an additional non-structural alternative for high-risk areas vacated by relocations. We recommend that the ROD further address this, even though implementation of such changes in land use would ultimately be a local decision (also see Comment Response 14 on *Coastal Greenspace* below).

* Comment Response 4 (*Ring Levees*) – EPA agrees with the COE’s response that: “In some cases, ring levees structures may be acceptable means of reducing risk.” The COE’s example of Forrest Heights may be reasonable since an “uncertified” levee structure already exists there that could be modified to be compatible with Flood Control Insurance Program. However, to reiterate our DPEIS comments, we find that ring levees are not preferable in most cases. Overall, they are expensive to build and maintain (i.e., rainwater must be pumped out of the levee enclosure), must be serviced by an access road that is elevated to levee height, and do not necessarily eliminate the evacuation need of the residents within the levee-enclosed area. In addition, ring levees may also require wetland fill and exacerbate flooding issues for surrounding communities (also see Comment Response 22 below for the *Forrest Heights Levee*). In cases where it is determined ring levees are necessary to protect coastal communities, EPA looks forward to working with you closely to identify environmentally acceptable levee alignments, and to ensure that potential adverse impacts to aquatic resources are avoided and minimized.

* Comment Response 6 (*Section 404 Permitting*) – We are pleased to understand that the COE deems the approach to hurricane/storm recovery is “closely coordinated” between its MsCIP team (COE Planning Branch) and Section 404 permitting (COE Regulatory Branch). EPA recommends and supports such consistency, and continues to encourage stronger collaboration among the COE’s Section 404 permitting program and planning program, including linking permitting decisions with the recovery conclusions reached in the FPEIS, namely, avoiding development and re-development in designated high-risk areas along the Mississippi coast. Moreover, we encourage the broad application of this coordinated coastal planning and permitting approach along other vulnerable coastal areas on the Gulf of Mexico.

* Comment Responses 9 & 21 (*Turkey Creek*) – EPA appreciates the COE’s efforts to coordinate the MsCIP restoration efforts with the Mississippi Department of Transportation’s (MDOT) mitigation efforts in the Turkey Creek watershed. This watershed is classified as a priority watershed by both the State of Mississippi and EPA. Consequently, EPA met with the COE following the submittal of our MsCIP comment letter on the DPEIS to reiterate our interest in ensuring that every effort is made to restore water quality and maximize future hurricane and storm damage reduction with the area. We will continue to work jointly with the Mobile District, MDOT, Mississippi Department of Marine Resources (MDMR), the Land Trust for the Mississippi Coastal Plain (Land Trust), and the communities of Turkey Creek to maximize the restoration efforts within the watershed.

* Comment Responses 10 & 18 (*Saltwater Intrusion*) – As suggested in Comment Response 2 above, our view that less saltwater intrusion problems exist in Mississippi than in Louisiana primarily refers to the Mississippi coastal mainland, i.e., what EPA considers traditional saltwater intrusion of coastal mainland rivers and groundwater. We agree that the nearshore salinities of the Mississippi Sound are now elevated after the hurricane events and that reasonable efforts could be used to restore the lower salinities that are optimal for the Sound’s commercial (e.g., oysters) and other natural flora and fauna. The proposed beach renourishment of the Gulf side of the Mississippi barrier islands should also help minimize future salinity elevations of Mississippi Sound (i.e., “saltwater intrusion” of the Sound) by providing more of a barrier to storm surges and island overwashes.

* Comment Response 12 (*Expedited Implementation*) – Although the COE’s “comment noted” response to our recommendation for expedited project implementation may imply concurrence, EPA wishes to re-emphasize that projects ready for implementation pursuant to this PEIS and its ROD should be rapidly implemented in anticipation of future storm events, so that impacts to the Mississippi coast can be reduced. Likewise, for projects requiring additional NEPA tiering from the PEIS, we recommend that these documents and data gathering efforts be initiated as soon as feasible for public review and prospective implementation.

* Comment Response 13 (*Gulf Application*) – We wish to reiterate the importance of broadly applying the non-structural alternatives approach where appropriate – both by the COE and the stakeholders seeking to locate along the coast – to the entire Gulf of Mexico because EPA concurs with the Mobile District’s innovative approach to restoration.

* Comment Response 14 (*Coastal Greenspace*) – Our recommendation to include coastal greenspace (parks and greenways) is not addressed. As suggested above, the COE should address this recommendation in its pending ROD for high-risk areas vacated by relocations, even though implementation of such changes in land use would be a local decision.

* Comment Response 17 (*New Section 5.17.8*) – Although this response refers the reader to Comment Response 6, and although we understand from that response that the COE deems the coordination between the COE’s Planning and Regulatory Branches to be good, the addition of our recommended Section 5.17.8 would have better confirmed and disclosed consistency between these branches (i.e., consistency between the conclusions of this FPEIS document and the Section 404 permit decisions made for applications to develop or re-develop in high-risk areas).

* Comment Response 22 (*Forrest Heights Levee*) – As suggested above in our comments on Comment Response 4, the proposed elevation of the existing levee at Forrest Heights has some merit since a structure already exists and the residents would like it to remain in place. We appreciate the COE’s reassessment efforts that notably reduced the wetland footprint for such elevation from 19.85 acres (17-ft levee) and 23 acres (23-ft levee) to

1.47 acres and 3.62 acres of non-tidal wetlands, respectively. We also concur that wetland mitigation is proposed to be located within the same watershed and assume that mitigation will be in-kind as well. However, we wish to reiterate that such a levee, even when improved (“certifiable” per the COE’s Comment Response 4) and compatible with the Flood Control Insurance Program, is not health protective even though it does reduce the risk of flooding for the enclosed community. As previously noted, EPA typically prefers the use of non-structural alternatives where appropriate, such as the proposed High Hazard Area Risk Reduction Plan (HARP) that provides residents the opportunity to move from high-risk to lower-risk areas

* Comment Response 23 (Near Term HARP) – The intent of the COE’s response to our comments on HARP projects is unclear: “The high hazard area is defined by FEMA flood insurance”. Therefore, these follow-up EPA comments are being provided:

Although EPA typically prefers non-structural alternatives that relocate residents out of high-risk areas, we note that one disadvantage to such relocation is the potential for societal effects on all demographics being moved, including environmental justice (EJ) communities. It remains unclear from this response as to what outreach communication and actions was/would be provided to the HARP communities that would be considered for relocation in the near term (2,000 structures). The ROD should better address the outreach planned for these communities, and Long Term HARP projects should be similarly treated. Additional tiered NEPA documents on Long Term HARP projects should include EJ demographic data/maps.

* Comment Response 27 (Disposition of Dredged Material) – We appreciate the COE’s reuse of suitable new work dredged material in nearshore littoral areas to keep clean sands in the littoral system.

RECOMMENDED COMPREHENSIVE PLAN

MsCIP restoration projects “presented in support of a Record of Decision for construction” are listed in the FPEIS on pages S-9 and S-10 of the Main Document. We note that this list is consistent with that of the DPEIS. In fact, it appears that additional projects may have been confirmed for construction in the FPEIS, although some additional NEPA documentation may still be needed following specific implementation plans for certain projects. The listed projects (components) that are essentially ready for construction in the Recommended Comprehensive Plan are:

- 1) Turkey Creek Ecosystem Restoration
- 2) Bayou Cumbest Ecosystem Restoration
- 3) Dantzler Ecosystem Restoration
- 4) Admiral Island Ecosystem Restoration;
- 5) Franklin Creek Ecosystem Restoration
- 6) Deer Island Ecosystem Restoration
- 7) Submerged Aquatic Vegetation [SAV] Ecosystem Restoration

- 8) Coast-wide Beach and Dune Restoration
- 9) Waveland Flood Proofing Pilot Project
- 10) Forrest (Forest) Heights Hurricane and Storm Damage Reduction
- 11) High Hazard Area Risk Reduction (HARP) including the Moss Point Municipal Structure Relocation; and
- 12) Comprehensive Barrier Islands Restoration Plan¹.

These projects are primarily ecosystem restoration projects, although non-structural community relocation and flood-proofing studies (e.g., Waveland flood-proofing) were also included. We note that other non-structural features offered in the Recommended Comprehensive Plan were also consistent with the Draft Comprehensive Plan. In the FPEIS (pg. 5-3), these features included:

- Hurricane Risk Reduction Education
- Hurricane and Storm Warning Systems;
- Hurricane Evacuation Planning;
- Floodplain Management;
- Building Codes;
- Zoning Codes; and
- Relocation of Critical Infrastructure and Services (Line of Defense 5).

Relative to floodplain management, the “coastal Mississippi risk zones” relative to hurricane and storm damage are shown in Figure 5-2 and depicted as high-risk and various lower risk areas. In addition to these non-structural features, we also recommend that the ROD also address the possibility of establishing coastal greenspace – such as parks and greenways – in areas vacated by high-risk area relocations, even though implementation of such changes in land use would ultimately be a local decision.

Therefore, EPA is pleased to note that the non-structural components and features of the Recommended Comprehensive Plan in the FPEIS are consistent (if not expanded) with the Draft Comprehensive Plan in the DPEIS. We recommend that the ROD remain consistent with the Recommended Comprehensive Plan in the FPEIS. Furthermore, we also recommend that the Comprehensive Plan be implemented in an expedited manner following COE approval to more rapidly produce a more resilient coastline and reduce the possibility of additional hurricane coastal damage to infrastructure and ecosystems.

Conclusions and Recommendations

EPA continues to support the progressive restoration approach used by the Mobile District to restore the Mississippi coastline following the infrastructural and ecological destruction by Hurricanes Katrina, Rita and Cindy. We particularly support the proposed use of non-structural alternatives where appropriate to complement structural alternatives

¹ We note that this Barrier Island project is listed differently on page 5-1 (*Barrier Island Risk Reduction Plan*). Also, the SAV and Waveland projects are termed as “Pilot Projects” on page S-10 but as “Ecosystem Restoration” projects on page 5-1. The ROD should clarify.

that may be needed. Non-structural alternatives would relocate residents out of designated high-risk areas, raise hurricane awareness through education and rezoning, and minimize flooding for any re-developments through structural elevations and better construction codes. Use of coastal greenspace – such as parks and greenways – in high-risk areas vacated by relocations should also be discussed in the ROD, even though implementation of such changes in land use would ultimately be a local decision.

EPA recommends that implementation of projects ready for construction after issuance of the ROD for this PEIS should be reasonably expedited to more rapidly minimize future coastal storm damage. Similarly, additional NEPA documentation for planned future projects tiering from this PEIS, such as Long Term HARP and barrier island renourishment, should also be feasibly expedited. COE Section 404 permitting decisions should be consistent with COE coastal planning activities. This would help ensure that the re-development or development of high-risk areas is avoided, that the non-structural alternatives devised by the MscIP team are implemented, and that activities which would conflict with coastal restoration efforts are not authorized. We further recommend that the lessons learned for the Mississippi coastline should be broadly applied – both by the COE and stakeholders seeking to locate along the coast – to the Gulf coastline in general.

EPA appreciates the opportunity to review the FPEIS and the Mobile COE's coordination with us. Where appropriate, we wish to offer our assistance for the expeditious implementation and application of the Recommended Comprehensive Plan. Should you have any questions, feel free to contact Ntale Kajumba at 404/562-9620 (kajumba.ntale@epa.gov) or Chris Hoberg at 404/562-9619 (hoberg.Chris@epa.gov) of my staff, and Duncan Powell at 404/562-9258 (powell.duncan@epa.gov) in the Region 4 Water Protection Division for specific waters-of-the-US issues.

Sincerely,



Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

cc: Mr. Claiborne Barnwell – MDOT: Jackson, MS
Mr. Jeff Clark – MDMR: Biloxi, MS
Mr. David Felder – USFWS: Daphne, AL
Brig. General Todd Semonite – COE/SAD: Atlanta, GA
Ms. Judy Steckler – Land Trust: Biloxi, MS
Mr. Dickie Walters – FHWA: Jackson, MS

U.S. Department of
Homeland Security

United States
Coast Guard



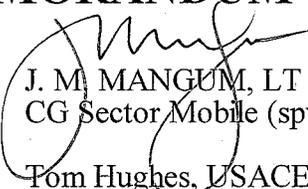
Commander
U. S. Coast Guard Sector Mobile

South Broad Street
Mobile, AL 36615-1390
Staff Symbol: s
Phone: (251) 441-6911
Fax: (251) 441-6168

Rec'd 10/6/09

1542
25 September 2009

MEMORANDUM

From:  J. M. MANGUM, LT
CG Sector Mobile (spw)

To: Tom Hughes, USACE

Subj: Mississippi Coastal Improvements Project

Ref: (a) June 2, 2000 Memorandum of Understanding between the Coast Guard and Army Corps of Engineers

1. This letter is in response to the proposed report of the Chief Engineers and the report of the district engineer on the Mississippi Coastal Improvements Project, Hancock, Harrison, and Jackson Counties, Mississippi.
2. In accordance with the June 2, 2000 Memorandum of Understanding between the Coast Guard and Army Corps of Engineers, my staff conducted an evaluation of the proposed reports on September 24, 2009. After conducting an initial risk assessment of the proposal, we found that the proposed project does not indicate an unacceptable level of risk with regard to waterway safety. Therefore, I have no comments or objections with this project
3. In order for the Coast Guard to give proper notice to the maritime community; the applicant shall contact the Waterways Management Office 60 days prior to performing the permitted action.
4. If you have any further questions concerning this matter or the applicant wishes to meet directly with a representative of the Captain of the Port, please contact the Waterways Branch at (251) 441-5940.

#

From: [Bee, Patricia L HQ02](#)
To: [Hughes, Thomas E HQ02](#); [Redican, Joseph H HQ02](#); [Ware, Charles L HQ02](#)
Subject: FW: Mississippi Coastal Improvements Program Review: FEMA R4 EO 11988 Floodplain Management Initial Reply 090902
Date: Wednesday, September 02, 2009 2:00:13 PM

FEMA response.

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

From: Straw, William [<mailto:William.Straw@dhs.gov>]
Sent: Wednesday, September 02, 2009 12:18 PM
To: Bee, Patricia L HQ02; Straw, William
Cc: Hughes, Thomas E HQ02
Subject: RE: Mississippi Coastal Improvements Program Review: FEMA R4 EO 11988 Floodplain Management Initial Reply 090902

Dear Ms. Bee: Thank you for your email, call, and extended opportunity after 3 Aug 09. We've had 12 new disasters in our region in the past 18 weeks.

I reviewed USACE's Mississippi Coastal Improvements Program report for FEMA Region IV's potential EO 11988 floodplain management concerns, where FEMA may help the lead federal funding agency as they make their EO 11988 floodplain management determinations for future actions they may fund.

Based on the program's project types, similar past projects' performance, laws of nature, and MS' natural hazard probabilities; if these projects are done using best design, construction, and management practices; and if done in compliance with federal public laws, presidential executive orders, and agency regulations; then the program's projects should reduce flood hazards in coastal MS, and thus, reduce risks posed to affected people's lives and improved property during the next 10 to 20 years, and longer for some projects. These project benefits would also support FEMA's agency mission to help people protect their lives, safety, and improved property.

However, the projects' initial public safety and property protection gains may also indirectly encourage some additional coastal development, which could reduce the projects' net gains. Furthermore, "softer" projects have limited design capacities and generally shorter "life-spans" (under same conditions). "Softer" projects are essentially sacrificial, prone to eventually be damaged and destroyed by future natural events. "Harder" projects also have limited design capacities, and although they may have longer life-spans, some may last only 25 to 50 years. Thus, for each project, the "affected" public, businesses, and communities should be aware of the project's design limitations and estimated project life-span, and they should prepare themselves and their families, businesses, and communities accordingly.

Of course, per the program and EO 11988, the lead federal funding agency or their designated alternate would have/make project-specific plans, designs, interagency consultations, public notice and participation, evaluations, regulatory determinations, and funding decisions on a case-by-case basis.

Importantly, when time comes for each project, that includes project-specific coordination with FEMA and with the affected jurisdictions' local floodplain administrators, and where none are available, with the state floodplain coordinator, for them to make decisions within their jurisdiction. Some of their

decisions may affect project plan, design, or feasibility.

When time comes for each project, unless FEMA RIV replies otherwise, its project-specific concerns would be within the scope of the comments above, primarily: (1) the project's initial public safety and property protection gains would be beneficial; (2) these gains will eventually be lost with time and further coastal development; and (3) the affected public, businesses, and communities should be aware of the project's design limitations and estimated project life-span, and they should prepare themselves and their families, businesses, and communities accordingly.

That summarizes FEMA Region IV's initial concerns about USACE's Mississippi Coastal Improvement Program, and FEMA Region IV's interests in future, project-specific interagency consultations.

Please feel free for anyone to contact me (email is usually best) about these or any related matters. Glad to do what we can to help.

Thank you again for the extended opportunity to reply on this major, beneficial program.

Best regards,

+r

"William" R Straw, PhD

FEMA R4 REHPO

770-220-5432

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Centers for Disease Control
and Prevention (CDC)
Atlanta GA 30333

September 16, 2009

Dr. Susan Ivester Rees
Army Engineer District, Mobile
P.O. Box 2288
Mobile, AL 36628-0001

Dear Dr. Rees,

We have received the final Programmatic EIS for the Comprehensive Plan and Integrated Programmatic Environmental Impact Statement, Mississippi Coast Improvement Program (MsCIP) Hancock, Harrison, and Jackson Counties, Mississippi. We are responding on behalf of the Department of Health and Human Services (DHHS), U.S. Public Health Service.

We understand that this project proposes a comprehensive plan that recommends water resource improvements associated with hurricane and storm damage reduction, flood damage reduction, and ecosystem restoration in the aforementioned counties of Mississippi. This study is in partial response to legislation in the Department of Defense Appropriation Act of 2006 (P.L. 109-148), dated 30 December 2005.

While we have no specific comments at this time, we always encourage that the development of comprehensive plans impacting the human environment include input from local and state public health professionals to assure human health impacts of potentially impacted populations are adequately assessed and that appropriate protective measures are integrated where necessary.

Sincerely,


Arthur M. Wendel, M.D., M.P.H.
LCDR USPHS
Medical Officer
NCEH/Healthy Community Design Initiative

On behalf of:
Andrew L. Dannenberg, MD, MPH
Associate Director for Science
Division of Emergency and Environmental Health Services
National Center for Environmental Health
Centers for Disease Control and Prevention
4770 Buford Highway, MS F-60
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Email: ACD7@cdc.gov OR healthyplaces@cdc.gov

From: [Bee, Patricia L HQ02](#)
To: [Ware, Charles L HQ02](#); [Redican, Joseph H HQ02](#); [Hughes, Thomas E HQ02](#); [Lucyshyn, John HQ02](#); [Matusiak, Mark HQ02](#)
Subject: MsCIP - HUD
Date: Friday, August 07, 2009 2:03:59 PM

No comment response rec'd, via phone, from Cassandra Terry, HUD.

Trish

From: [Bee, Patricia L HQ02](#)
To: [Ware, Charles L HQ02](#); [Redican, Joseph H HQ02](#); [Hughes, Thomas E HQ02](#); [Lucyshyn, John HQ02](#); [Matusiak, Mark HQ02](#)
Subject: MsCIP
Date: Thursday, August 06, 2009 12:02:21 PM

A no comment reply rec'd, 8/5/09, via phone, from Dave Keys, Commerce (NOAA).

Trish