



Meghan Quinn
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October 16, 2015

Re: Dredge Material Management Plan

Dear Ms. Quinn:

Connecticut Fund for the Environment and its bi-state program Save the Sound (“CFE/Save the Sound”) work to protect and improve the land, air, and water of Connecticut and Long Island Sound. We appreciate the opportunity to comment on the Dredge Material Management Plan (“DMMP”) for Long Island Sound.

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.”¹ 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.

CFE/Save the Sound has three key comments: 1) beneficial re-use is a real opportunity that requires additional assessment, project identification, and project coordination through the DMMP; 2) any 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; and 3) additional information on the impact of disturbing, transporting, and disposing of nitrogen rich soils must be developed, analyzed, and monitored.

¹ <http://www3.epa.gov/region1/eco/lisidreg/pdfs/LISDredging070505-070506.pdf> page 1

² <http://www3.epa.gov/region1/eco/lisidreg/pdfs/LISDredging070505-070506.pdf> page 5.

Beneficial Re-use:

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.³ 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.⁴

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.

Economic Evaluation of Disposal:

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. 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

³ American Littoral Society, for NFWF, *Assessing the Impacts of Hurricane Sandy on Coastal Habitats*, December 17, 2012.

⁴ See *ALS Assessment* at Exhibit 1, pp. 17-22. Resources identified as requiring some form of sediment sources include various beachfront parks on Long Island, Great Gull Island, NY; Silver Sands State Park and Milford Point, Milford, CT; Falkner Island, Guilford, CT; Menunketesuck Island and Duck Island, Westbrook, CT; Seaview Beach, Madison, CT; Rocky Neck State Park, East Lyme, CT; Harkness Memorial State Park along with Waterford Town Beach and Pleasure Beach in Waterford, CT; Caumsett State Historic Park Preserve on Long Island; and Manursing Lake in Rye, NY. This is an initial summation; there are additional sediment-based restoration needs as well. For instance, a proposed tidal marsh restoration project in Holly’s Pond at the mouth of the Noroton River in Connecticut will require significant sediment inputs. This does not begin to include potential beach and dune restoration options along privately owned and low-lying residential beach communities that suffered substantial wave and flooding damage scattered along the Connecticut, Westchester and Long Island coasts.

