



ST. JOHNS RIVER: TO DREDGE OR NOT TO DREDGE

The U.S. Army Corps of Engineers is currently studying the proposal to dredge the St. Johns River from 40 to 47-feet to accommodate larger post-Panamax ships.

St. Johns Riverkeeper has serious concerns that:

- The impacts to the river are being significantly underestimated,
- The economic and environmental risks have been ignored or downplayed,
- The projected economic benefits have been dramatically overstated by Jaxport and some of its partners, and
- Relevant information and facts have been excluded from the analysis and/or public debate.

Here are some of the facts you should know:

Overview

- Thirteen miles of the river would be deepened, from the mouth of the St. Johns River to just west of the Dames Point Bridge near Blount Island.
- Two areas of the channel close to Chicopit Bay and Ft. Caroline National Memorial would be widened.
- The widening and 17.5% increase in depth would require the removal of 18 million cubic yards of dredged material, the equivalent of over 1.6 million dump truck loads.
- Up to 56 million cubic yards of dredge material would be removed from annual maintenance dredging over the 50-year life of the project.
- The dredged material will be placed in a newly created Offshore Dredged Material Disposal Site (ODMDS), located in the Atlantic Ocean southeast of the mouth of the river.
- The Environmental Impact Study (EIS) was fast-tracked by President Obama's "We Can't Wait Initiative," reducing the timeframe by 14 months and limiting the ability of the Corps to thoroughly evaluate this complex issue.
- The federal government shutdown further compromised the ability of the Army Corps and other partner agencies, such as the Environmental Protection Agency, to thoroughly evaluate the impacts of the proposed deepening.

Environmental Impacts

- Salinity will move farther upstream, impacting hundreds of acres of wetlands and submerged aquatic vegetation (SAVs) and killing or stressing numerous trees in some sections of the river.
- The most significant impacts to wetlands are expected to occur along the St. Johns, within the Ortega River, Julington, Durbin, and Black Creeks.
- The Corps acknowledges the limitations of its models: "Actual conditions will deviate from those used to drive the models. These deviations introduce additional uncertainty in the models' ability to predict future conditions and impacts."
- The models estimate the exact same impact to wetlands (394.57 acres) and submerged aquatic vegetation (180.5 acres) for every depth analyzed (44, 45, 46, 47, and 50-ft deep channel).

- Water may remain in the river for a longer period of time, increasing the probability of algal blooms.
- Larger ships will create larger wakes, increasing the likelihood of shoreline erosion.
- The mitigation plan is woefully inadequate, failing to offset damage incurred from dredging.
- The Environmental Protection Agency (EPA) estimates that a volume of 4,309,677 cubic yards of rock may need to be removed, potentially exposing the surficial aquifer to saltwater intrusion.
- The U.S. Fish and Wildlife Service and the Florida Fish and Wildlife Conservation Commission have expressed concerns regarding the potential impacts to threatened and endangered species from the blasting that will be necessary.
- The impacts from dredging are expected to significantly exacerbate and expedite the inevitable affects of sea level rise (SLR). Unfortunately, the Army Corps evaluates the effects of the minimum value for SLR and never considers either the Intermediate or the worst-case scenario.
- The Independent Expert Peer Review (IEPR) of the EIS raised significant concerns stating that the analysis of salinity results “provide an incomplete understanding of the impacts of channel enlargement” and the sediment modeling results “do not provide a reliable estimate of the annual sedimentation rates” and “are assumed to be unreliable indicators of future conditions.”

Economic Considerations

- The harbor deepening is projected to cost at least \$684 million, with Jaxport and the local community responsible for over \$371 million.
- This total does not include the cost of fixing Mile Point, annual maintenance dredging, and road and other infrastructure improvements that will be necessary.
- The Corps report only evaluates the benefits of larger vessels having access to a deeper harbor. These transportation cost savings would accrue primarily to the shippers and carriers, not the local economy.
- Local job projections are from a report by a paid consultant of Jaxport. The Martin Associates report has not been evaluated by the Corps and the assumptions and methodology used by Martin have not been independently peer-reviewed and validated.
- Nearly 66% of the jobs cited by Jaxport are "related jobs." The Martin study clearly states: “It is to be further emphasized that when the impact models are used for planning purposes, related jobs should not be used to measure the economic benefits of a particular project. Related jobs are not estimated with the same degree of defensibility as direct, induced and indirect jobs.”
- No cost estimate has been provided for the annual maintenance dredging that will be required.
- The Dames Point Bridge has a vertical clearance of 174 feet and the Blount Island overhead power cables have a clearance of 175 feet. Some of the post-Panamax ships require an air draft of 190 feet or more.
- “The canal expansion will not provide any benefits to shippers that are not already available today, so there will be no unfulfilled demand for East Coast ports to fulfill. For that reason, many ports that are relying on the canal expansion to generate astronomical post-2014 growth will be very disappointed.” www.supplychainquarterly.com/topics/Logistics/201201panama/
- The IEPR concluded that "The Regional Economic Development (RED) benefits are incorrectly attributed to the harbor deepening and therefore overemphasize regional benefits of the Jacksonville Harbor Project."
- The Army Corps has failed to conduct a multi-port analysis. As a result, the IEPR identified this omission as a “showstopper” issue.