

From: Huebel, Lindsey FLNR:EX <<email address removed> >
Sent: January 12, 2022 1:37 PM
To: Hannigan, Jessie EAO:EX <<email address removed> >
Subject: Deltaport 4 - Draft Joint Guidelines - FLNRORD Comments

Hi Jessie,

The following are our comments on the Draft Joint Guidelines:

Comments on Draft Joint Guidelines

Primary concern: Effects of dredging on Roberts Bank WMA

- If dredging is proposed within the Roberts Bank WMA, then we would be concerned about harmful alteration, damage, or destruction of fish and wildlife habitat within the WMA. We are also concerned about the implications of dredging and construction activities that would be required adjacent to the WMA, which may have harmful effects within the WMA including sedimentation (e.g., affecting eelgrass meadows, fish, and other wildlife values in the WMA) and acoustic disturbances to wildlife. We would also be concerned about potential negative impacts of shipping and operation of an expanded terminal, including pollution, noise pollution, and vessel collisions with wildlife using the WMA. It is unclear how the DP4 project may affect the resilience of ecosystems within the WMA, including resilience to sea-level rise.
- Would like to see a model of how dredging may affect/change sedimentation patterns within the WMA
- Spatial Boundaries – would want to have the project assessment boundaries to include Roberts Bank WMA

Comments on VCs:

VCs of concern:

- Sediment Quality VC – we would like to request that sediment disturbance/flow is also analyzed **with respect to the WMA**
- Marine Fish and Habitat VC – particular interest in impacts to mudflat biofilm, invertebrates, sturgeon

Other Comments:

- Intertidal marsh captured under VC Marine Fish and Habitat; however, there is concern this does not put enough emphasis on examining impacts to the marsh ecosystem as whole
- Can wetland habitats (our concern primarily tidal marsh and the WMA) be a standalone VC? If not a VC, how is it ensured that the WMA wetlands will be carefully considered?
- Benthic invertebrate assessment

- Unclear where location of invertebrate assessment will take place. We would be concerned re impacts to benthic communities in the tidal marsh ecosystem & WMA
- “habitat forming invertebrates” – which inverts specifically?
- “benthic infauna” – unclear which and how many inverts will be assessed. Will an assessment of benthic invertebrate **community structure** be conducted?
- Is it possible to include benthic invertebrates/communities as a standalone VC – separate from fish habitat?



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