

DRAFT

Recommendation for SEG position on Corps use of study committee reports and other information in preparing the General Reevaluation Report (GRR), Mitigation Plan, and draft EIS for the Savannah Harbor Expansion Project.

The SEG recommends that the Corps incorporate into their analysis of the project the reports from the various study committees, recognizing that these may be incomplete or inaccurate. To ensure the most accurate and comprehensive use of information by the Corps in further analysis of the project's impacts, mitigation alternatives and their impacts as well, we recommend the following standards of review.

1. Degree of risk and uncertainty.

To determine the usefulness of project analysis, decision-makers (including the public) must have reliable advice about the certainty/uncertainty of the assessment of impacts and mitigation alternatives. Likewise, implications about any uncertainty must be clarified. If risk is determined to be significant, contingencies for quickly responding to impacts must be provided so that unforeseen adverse consequences will be minimized. *This should include specification of all assured sources of funding that will be available to cover the costs of any previously unforeseen corrective actions or compensation for cost overruns that may need to be pursued to protect public resources.*

2. Systemic Implications.

Due to the complex and interactive nature of the natural systems affected by the project, impacts on one resource or group of resources may have consequences for others, either short-term or long-term. Studies focusing on one resource (e.g., striped bass) may be complete and accurate on one level, but may have implications for other resources – such as species or habitats of concern. The same can be said for mitigation efforts – a reasonable mitigation alternative for controlling or compensating for one kind of adverse impact for a resource of immediate concern may itself produce undesired effects on other resources. Such systemic and interactive effects must be clearly explained and fully evaluated when analyzing the project's impacts and mitigation measures that are based on a comprehensive list of individual issues or resources. As with the case of uncertainty, contingencies for intervening to prevent significant but unforeseen systemic impacts must be well planned and thoroughly described as part of the Corps analysis and mitigation plan.

3. Metrics & methods for evaluation impacts.

Whatever studies or recommendations are adopted, including those augmented by additional Corps analysis, Corps reporting must specify carefully considered methods for monitoring and evaluating the impacts of both the project and mitigation efforts. These methods must specify in detail the protocol for gathering and assessing information, and the criteria to be used to trigger enactment of contingency plans for controlling adverse effects if and when they arise. Contingency procedures should include the use of more rigorous monitoring and assessment methods to assist in determining the causes of undesired impacts and the alternatives for reducing or eliminating them. Such procedures must also include the option of stopping project implementation activities for an indeterminate period to prevent unacceptable impacts from occurring. In any case, project analysis and recommendations must specify the threshold of conditions that must be ensured to enable the project to remain feasible in the public interest. If these conditions cannot be maintained, procedures must be clearly outlined for intervening to prevent the project or its mitigation from causing further damage to public resources.