#### **Frequently Asked Questions (FAQ)** Waukegan Harbor Maintenance Dredging and Placement

The Environmental Assessment (EA) public comment period for the Waukegan Harbor Dredging Project closed on August 20, 2019. During the solicitation for public comments, the USACE Chicago District received 25 comments from members of the public, local organizations, state agencies, and other federal agencies. Many of the comments from the public were overlapping in topic, and responses to those questions are outlined below.

## Is the area in and around Waukegan Harbor still contaminated with PCBs, asbestos, or other harmful substances?

Pollutants such as PCBs and asbestos have been and continue to be routinely tested for in dredged material. The portions of the harbor's approach channel and outer harbor that are proposed for dredging in this EA were not part of the historic superfund site. The sediment within the approach channel and outer harbor that are to be dredged have non-detectible concentrations of asbestos and PCBs. Additionally, the superfund site in question has been addressed by the USEPA and is considered remediated. See section 3.5.2 of the 2014 Approach Channel Contaminant Determination Report and the 2015 Outer Harbor Contaminant Determination Report and the 2015 Outer Harbor Contaminant Determination Report for analytical results. Both are available on the project webpage (https://www.lrc.usace.army.mil/Missions/Civil-Works-Projects/Waukegan-Harbor-Dredging/).

## Why does sand come from Waukegan Harbor and what is done with sand dredged from the project area?

Sand naturally moves southward along the coast of Lake Michigan in a process known as littoral drift. Depending on environmental factors such as wave action or storm events, more or less sand can be moved via this process. This sand can accumulate in areas where structures (e.g. breakwaters and groins) in the lake block the sand's southward progression. The channel of Waukegan Harbor is an area that routinely sees infilling of sand due to the littoral drift process potentially impeding navigation of the harbor channel in the process. USACE has been directed by Congress to maintain the navigational channel at Waukegan Harbor, thus dredging is anticipated to continue in future years. The range of options for sediment management include placing the sediment up or down drift from the harbor. This could be within the littoral zone (shallow water) or within the open water placement area. There is a beneficial use program that is being considered for future use of dredged material to place sand onto beaches upon request (and pending local funding) for placement by a community.

### Is sand being placed on my community's beach?

The default placement area for dredged material from Waukegan Harbor is within an open water placement area, approximately one mile south of the harbor (figure 2 of the EA). In order for placement to occur at any municipality under this current EA:

- A need for sand must be expressed by the local municipal government,
- A non-federal funding source must be identified to cover the difference in transportation and placement costs,
- Appropriate permits must be obtained,
- *Real estate agreements must be signed*

• A Memorandum of Understanding (MOU) executed between the Chicago District and the local government associated with sand placement.

Currently, none of these requirements have been met and placement of dredged material is anticipated to be within open-water location(s) for the near term.

Under a separate pilot program (Section 1122 of WRDA 2016), sand may be placed on any of the six beaches identified in the EA at 100% federal cost. During the feasibility phase of this pilot program, study findings and additional NEPA documentation, as necessary, will be released and an additional public review process will be initiated related to the specific plans developed during this process. It is anticipated that the placement of dredged material from Waukegan Harbor on public beaches under the Section 1122 pilot program would not be implemented until 2021 at the earliest.

### Can my community obtain sand from somewhere else?

Yes. Priorities in local spending are not within the federal purview, and citizens may want to contact their local government officials with questions regarding local spending priorities. The proposed actions outlined in the EA relate to the federal navigational maintenance activities at Waukegan Harbor only. Local municipalities are under no obligation to place dredged material on their beaches and local activities related to beach nourishment or coastal management using other sand sources are not covered under this EA.

## What area is being considered for these dredging and placement activities and what is the current condition?

The approach channel, advanced maintenance area, and outer harbor are the areas that are likely to be regularly dredged. Placement areas include an open water placement area south of the harbor, the littoral zone just offshore of designated municipal beaches, and potentially several municipal beaches. A full map of these locations can be found in figure 2 of the EA.

Given the current, highly modified lakefront and manmade structures within and along the shoreline, there is no longer a "normal" state for the shoreline in the historical context. Many of the natural processes have been drastically changed or interrupted because of human construction. As a result, the shoreline is constantly eroding in many places, while also experiencing extensive shoaling in other areas. This results in capture of sand in areas such as around Waukegan Harbor resulting in a need for dredging to keep the harbor open and extensive erosion from others resulting in a loss of beach (p25, and Sections 3.1 and 3.2 of the EA). The expectation for the project area without intervention is outlined in section 2.1 of the EA

# How much and what kind of material could be dredged and placed on beaches if an agreement was reached between the local municipality and the Chicago District?

The sediment at Waukegan Harbor is clean sand. The federal navigational maintenance project does not include shoreline protection or armoring (i.e. placing of stone). Quantities of dredged material to be placed are dependent on material available. The initial volume estimates are given in the EA, however the amount of sediment that could be placed on beaches would vary over time based on water levels, storm conditions, shoreline erosion, and littoral drift.

- Waukegan Municipal Beach There was no specific identification of how much sand would be needed to sustain the beach or specific areas within the beach to place the sand. About 1.56 acres was identified as being viable for placing sand within the beach and surf zone.
- Foss Park Beach The requested amount of sand is about 4,477 cyds. That would cover an estimated 2.27 acres.
- Sunrise Beach The requested amount of sand is about 769 cyds. That would cover about 1.08 acres of beach and surf zone.
- Glencoe Beach The requested amount of sand is about 1,500 cyds. That would cover about 1.16 acres of beach and surf zone.
- Lee Street Beach, Greenwood Street Beach, & Dog Beach The requested amount of sand is about 3,000 cyds. That would cover about 6.27 acres of beach and surf zone.
- The Open Water South Placement Area measures 4,000 feet north to south.
- Illinois Beach State Park covers 6.5 miles of Lake Michigan shoreline.

This is a continuing operation as long as there is ongoing funding for navigation dredging in this area. Each year dredging and placement is conducted and operations will last approximately 1-3 months depending on the volume of sediment to be dredged, weather conditions, the equipment provided by the contractor, and other factors.

### Is the dredging activity sustainable?

USACE has been directed by Congress to maintain the navigational channel at Waukegan Harbor, thus dredging is anticipated to continue in future years pending funding for dredging operations. The range of options for sediment management include placing the sediment up or down drift from the harbor, either in the littoral zone (shallow water) or on the beach, at many locations. To the extent that the placement locations mimic the historic natural sand migration processes, this is a sustainable activity, however, the ability to continually exercise the option to place sand on the beaches is dependent upon local and federal funding. There is a Great Lakes Coastal Resiliency Study that is currently being conducted that might bring to light additional options for the long term management of the Lake's shoreline.

### Who conducts the dredging and placement?

Dredging is conducted by commercial dredging contractors for USACE. These contractors are responsible for acquiring their equipment. The companies operate within the Great Lakes system and are familiar with the rules, regulations, and requirements of operating within this system.

### How is sediment tested and what standards are adhered to?

USACE follows the Great Lakes Testing Manual, developed by USEPA and USACE, when evaluating sediment. Illinois EPA also maintains conditions as part of the Clean Water Act Section 401 Water Quality Certification for this project. Any sediment being placed in water or below the ordinary high water mark (such as a beach) are regulated by the State of Illinois under Title 35 of the Illinois Administrative Code. Standards for Lake Michigan can be found throughout the Illinois Pollution Control Board website

(<u>https://pcb.illinois.gov/SLR/IPCBandIEPAEnvironmentalRegulationsTitle35</u>). The Chicago District has sampled in the past for contaminants and results can be found in the contaminate determinations found on the district's webpage (<u>https://www.lrc.usace.army.mil/Missions/Civil-</u>

<u>Works-Projects/Waukegan-Harbor-Dredging/</u>). As in the past, the district plans to sample sediment in 2020 and in accordance with the requirements of Section 401 of the Clean Water Act before dredging operations commence. Sediment is also evaluated periodically as changes in conditions warrant and in consistence with the Great Lakes Testing Manual and other guidance. USACE obtains laboratory services from independent commercial laboratories with current NELAP certification.

### Will there be public meetings for this project?

For the current dredging project where sediment will be placed in the default open water or littoral locations no further public comments are being sought at this time. The Chicago District made reasonable efforts (defined by 32 C.F.R. § 651.36(b)) to notify the public and solicit comment for its activities by sending over 160 letters to local, state, and federal officials (i.e. congressional representatives, mayors, state representatives); letters to local, state and federal agencies (USFWS, IL DNR, municipal park districts); participating in a public forum on coastal erosion hosted by Illinois State Representative Robyn Gable on July 10, 2019; and posting on the district's social media page. These actions resulted in, among other things, news organizations, such as Evanston Now, publishing stories online and in print about the project and asked for comments to be submitted to the Chicago District. The comment period was also extended from the standard 30 days (32 C.F.R. § 651.14 (b) and 32 C.F.R. § 651.35) to 53 days to accommodate additional comments. The 1122 pilot project for direct, on beach placement that is currently being developed will be releasing its own feasibility study findings and NEPA documentation, as necessary, in the near future. This project will have its own public comment period using similar public notice techniques as the current project. The district will also host or participate in well-advertised additional public meetings in the participating communities in order to notify interested parties.

## What are other, similar projects the U.S. Army Corps of Engineers has conducted in fresh and salt water environments?

The beach placement project is under the Beneficial Use of Dredged Material Pilot Program under section 1122 of the Water Resources Development Act. Various USACE Districts have participated in this program to complete many projects throughout the county including restoring Poplar Island in Chesapeake Bay, The Montezuma Wetlands Project in San Francisco Bay-Delta, the restoration of Texas Point National Wildlife Refuge, and many others that can be found on the various USACE districts' webpages. Additional information on Great Lakes dredging can be found at: <u>https://www.lre.usace.army.mil/Missions/Great-Lakes-Navigation/</u>