



UNITED STATES DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration

NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office

263 13th Avenue South

St. Petersburg, Florida 33701-5505

<http://sero.nmfs.noaa.gov>

December 8, 2014

F/SER47:JD/pw

(Sent via Electronic Mail)

Lt. Col. John Litz, Commander
Charleston District, Corps of Engineers
69A Hagood Avenue
Charleston, South Carolina 29403-5107

Attention: Colt Bowles

Dear Lt. Colonel Litz:

NOAA's National Marine Fisheries Service (NMFS) reviewed the Draft *Environmental Assessment for Establishing Mine Resistant Ambush Protected (MRAP) Vehicle Storage and Repair Facilities at Joint Base Charleston/Army Strategic Logistics Activity Charleston, South Carolina* (Environmental Assessment), Finding of No Significant Impact and Finding of No Practicable Alternative, and Charleston District's letter, all dated November 21, 2014. The Charleston District, Army Strategic Logistics Activity Charleston (ASLAC), and U.S. Air Force have evaluated the potential environmental consequences from constructing and operating enclosed MRAP vehicle storage spaces, a vehicle maintenance facility, an armory, and supporting infrastructure at Joint Base Charleston, Berkeley County. The project would require filling 0.76 acres of non-tidal freshwater wetlands associated with Back River. As the nation's federal trustee for the conservation and management of marine, estuarine, and anadromous fishery resources, the following comments and recommendations are provided pursuant to authorities of the Fish and Wildlife Coordination Act.

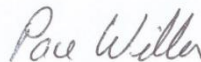
Five sites at Joint Base Charleston were initially examined for the MRAP vehicle facility, and the Draft Environmental Assessment evaluates two alternatives in detail, the proposed action and the No-Action Alternative. The proposed action includes constructing 12 dehumidified metal buildings approximately 133,000 square feet each, a 53,544-square-foot vehicle maintenance facility, and a 9,000-square-foot armory for controlled items, such as weapons and sensitive equipment. Construction would take place at Site 5, a 95-acre undeveloped, wooded parcel adjacent to existing ASLAC facilities approximately one mile from Back River. Supporting infrastructure for the new facility would include utilities and connections, lighting, parking, walkways, curbs and gutters, and storm drainage. MRAP vehicles would be temporarily stored in previously filled parking areas at the ASLAC compound and Pier C until construction of the project is complete.



The Draft Environmental Assessment states 0.76 acres of wetlands within the project area would be filled and mitigated. Some wetlands depicted in Figure 3-1 are outside of the proposed construction site boundary. It is unclear if the 0.76 acres includes all the wetlands identified in Figure 3-1 or just the area inside the construction boundary. NMFS recommends this be clarified in the Final Environmental Assessment. The Draft Environmental Assessment indicates up to eight freshwater wetland mitigation credits are needed to compensate for the project impacts. The exact number of wetland credits and the mitigation bank these credits would be purchased from would be determined during the USACE permitting process. NMFS recommends the Final Environmental Assessment consider the feasibility of permittee-responsible mitigation because there currently are no mitigation banks that drain to Back River or the Cooper River. NMFS prefers the mitigation occur within the same river basin as the impacts.

NMFS appreciates the opportunity to provide these comments. Please direct related correspondence to the attention of Ms. Jaclyn Daly-Fuchs at our Charleston Area Office. She may be reached at (843) 762-8610 or by e-mail at Jaclyn.Daly@noaa.gov.

Sincerely,



/ for

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

cc:

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