



**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>

January 15, 2015

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: Mary Hope Green

Dear Lt. Colonel Litz:

NOAA's National Marine Fisheries Service (NMFS) reviewed public notice 2008-00860-2G, dated December 23, 2014. MeadWestvaco-Camp Hall, LCC, requests authorization from the Department of the Army to place fill into freshwater wetlands to construct a master-planned industrial development near Rudd Branch and Timothy Creek, Berkeley County. The applicant proposes to preserve wetlands on-site and to purchase 177.4 credits from the Pigeon Pond Mitigation Bank as compensatory mitigation for the impacts to wetlands. The Charleston District's initial determination is the proposed fill would not be within areas designated essential fish habitat (EFH). NMFS agrees with this determination and, accordingly, offers no comments under the authorities of the Magnuson-Stevens Fishery Conservation and Management Act. 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.

The proposed 1,498-acre Camp Hall Industrial Campus includes access roads, building pads, utilities, and stormwater management infrastructure within a 6,781-acre tract owned by the applicant. Based on sheet 3 of 45 in the plans, the applicant would fill 5.337 acres of jurisdictional wetlands, 2.311 acres (9241 linear feet) of jurisdictional ditch, and 11.0 acres of non-jurisdictional wetlands. The applicant would also construct a temporary utility crossing on 1.533 acres of jurisdictional wetlands and 0.159 acre (708 linear feet) of jurisdictional ditch.

The proposed project would permanently impact, through clearing and filling, 18.65 acres of wetlands and temporarily impact 1.692 acres of wetlands associated with Rudd Branch and Timothy Creek. Rudd Branch flows into the headwaters of the Ashley River, and Timothy Creek flows to the Edisto River. The project would result in an increase of impervious surface in the watershed, increasing the amount and decreasing the quality of runoff. Wetlands absorb and store rain and pollutant-loaded runoff. By protecting the remaining wetlands on-site, the applicant is minimizing the impacts of the project and preventing further development of the site. The applicant could further minimize impacts by constructing bio-swales throughout the developed area to reduce the amount of runoff.


To satisfy compensatory mitigation needs, the applicant proposes to preserve 167.48 acres of jurisdictional wetlands, 7.045 acres of non-jurisdictional wetlands, 0.246 acres of jurisdictional ditch, and 101.36 acres of upland buffer that essentially surround the developed area. In addition, the applicant



would purchase 177.4 credits from the Pigeon Pond Mitigation Bank. The bank is connected to the Wassamassaw Swamp, headwaters of the Ashley River; therefore NMFS has no concerns with using the bank but has concerns with identifying the number of credits at this time. The applicant is requesting a 20-year permit to accommodate phased expansion. Over these two decades, the Charleston District may alter the method of calculating the credits needed, and credits from this bank may be depleted other applicants. NMFS recommends the permit include an immediate credit purchase requirement based on the initial work and that future credit needs be based on procedures at the time of those impacts. Alternatively, the applicant could propose a combination of restoration, enhancement, and protection for additional wetlands on-site to satisfy all mitigation needs.

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](mailto:Jaclyn.Daly@noaa.gov).

Sincerely,



/ for

Virginia M. Fay  
Assistant Regional Administrator  
Habitat Conservation Division

cc:

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