



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>

February 23, 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: David Wilson

Dear Colonel Litz:

NOAA's National Marine Fisheries Service (NMFS) reviewed public notice SAC-2013-00717, dated January 26, 2015. S. Grove, LLC, and MWV-East Edisto Charleston, LLC, request authorization from the Department of the Army to restore, enhance, and preserve wetlands within a 4,347-acre tract in the Stono River subbasin of the South Carolina Coastal watershed (HUC 03050202), Charleston County. The purpose of the work is to establish a mitigation bank for authorized impacts to aquatic resource functions and services associated with future development activities within the Mid-Atlantic Coastal Plain and Sea Islands Coastal Marsh ecoregions. The Charleston District has determined the proposed restoration and enhancement activities are upstream of areas designed 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 a member of the Charleston District's Interagency Review Team and 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.

Description of the Proposed Project

The proposed mitigation bank, located near the town of Ravenel, currently includes 1,049 acres of wetland pine plantation, 2,761 acres of palustrine forested and shrub wetlands, 503 acres of uplands, 34 acres of silviculture roads, and 37,700 linear feet of canals associated with historic inland rice culture. The pine wetlands would be enhanced by clearing the pine and planting bareroot hardwood seedlings on twelve-foot spacing (302 trees/acre). Once the work is complete, the sponsor would monitor the enhancement area for five years to ensure performance standards for the vegetation are being met. The entire site would be placed under a conservation easement. The sponsor is not proposing to plug canals or remove roadbeds. The service area of



the bank would include the Stono River watershed and adjacent Cooper River watershed (HUC 03050201). The Charleston District would authorize the work under Nationwide Permit 27.

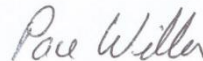
Comments on the Prospectus

While the habitats within the Caw Caw Mitigation Bank would not be suitable for offsetting impacts to EFH, NMFS believes the bank could potentially offset impacts to freshwater wetlands within the proposed service areas. However, the sponsor should address the following comments for NMFS to better assess the proposal:

- The Prospectus does not identify how the bank would contribute to the needs of the Stono River watershed. Current and forecasted land use surrounding the site should be examined with special attention to likely future development.
- The road network also serves as dikes for the canals which are proposed for preservation due to their potential cultural significance. The sponsor claims neither the roads nor canals have impacted wetlands on the property. A hydrological assessment should be provided to support these assumptions, and the restoration actions should be augmented if needed based on results of the assessment.
- The third party conservation easement holder and eventual property owner would be Charleston County Parks and Recreation Department. The expected uses of the property by the public should be identified.
- The Mitigation Banking Instrument should explicitly state credits from this bank would not be available to offset impacts to tidal wetlands and other EFH.

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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