



UNITED STATES DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration

NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office

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(Sent via Electronic Mail)

Colonel Allan M. Dodd, Commander
Jacksonville District Corps of Engineers
Antilles Office
400 Fernandez Juncos Avenue
San Juan, Puerto Rico 00901-3299

Attention: Johann M. Sasso

Dear Colonel Dodd:

NOAA's National Marine Fisheries Service (NMFS) reviewed the letter dated January 21, 2015, from the Jacksonville District requesting an essential fish habitat (EFH) consultation for nationwide permit application SAJ-2014-02968 (NW-JMS) from the Virgin Islands Port Authority (VIPA) for repair work at the Christiansted Seaplane Facility on the northern coast of St. Croix, USVI. The proposed work is part of an effort to remediate leaky underground storage tanks and to prevent further deterioration of the bulkhead. By email dated February 25, 2015, the Jacksonville District provided an initial determination that the impacts to 5 square feet of seagrass and 16 corals, designated EFH by the Caribbean Fishery Management Council (CFMC), would not have a substantial adverse impact on EFH or federally managed fishery species. 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 and the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act).

Description of the Proposed Project

VIPA proposes to repair the Christiansted Seaplane Facility by installing 1,174 feet of sheet pile around the perimeter of the facility, of which 787 feet are upland. Construction and repairs to the concrete aprons along the bulkhead and placement of 125 cubic yards of gravel backfill material between the old and new bulkhead sheet piles would be done from land. A trench would be excavated to approximately 5 feet below existing grade, using equipment such as a Hang Grab, and then filled with a mixture of soil and bentonite. Before, during, and after installation of the sheet piling, water quality monitoring would be conducted and turbidity barriers (type II or III) would be installed to control turbidity around the work area. Silt fences would enclose the excavation area and stockpiled material during excavation and construction of the upland concrete diaphragm wall. Excess material and soil would be removed and disposed in an upland landfill.



Essential Fish Habitat in the Project Area

NMFS biologists visited the site in August 2013 with VIPA's environmental consultant, BioImpact. The biologist's findings from the site visit are consistent with the habitat characterization in VIPA's Environmental Assessment Report (EAR), dated July 2013. The habitats immediately surrounding the seaplane facility are dominated by previously dredged areas consisting of 10 to 30 percent seagrass cover, primarily *Thalassia testudinum*. On the bulkhead, there are less than 10 small *Siderastrea radians*, one *Favia fragum*, and six *Diploria strigosa* (growing on the eastern face of the bulkhead). Juvenile fishes, primarily jacks and grunts, as well as juvenile lobsters, use the rubble and openings in the bulkhead as habitat. Near the seaplane ramp towards the West of the project site, there are rubble and conch shells colonized by *Porites porites* and *P. astreoides*.

The Caribbean Fishery Management Council (CFMC) identifies seagrass, sandy bottoms, and corals as EFH under the fishery management plans for spiny lobster, queen conch, or reef fish. These habitats serve as nursery areas for fishery species. Seagrass and corals are part of a habitat complex that supports a diverse community of fish and invertebrates. Seagrass also provides important water quality maintenance functions (such as pollution uptake), stabilization of sediments, wave action attenuation, and production and export of detritus (decaying organic material), which is an important component of marine and estuarine food chains. Additional information about these EFH designations and how these habitats support fishery species is found in *Essential Fish Habitat (EFH) Generic Amendment to the Fishery Management Plans (FMPs) of the U.S. Caribbean*.

Project Impacts and Minimization of Impacts to Essential Fish Habitat

The EAR states approximately 1,450 square feet of sea bottom would be impacted by the proposed work, although the EAR notes the exact area depends on the final alignment of the wall. As an effort to minimize impacts, VIPA proposes to transplant six *Diploria strigosa* and one *Siderastrea radians* that measure more than 4 inches in diameter to an area on Long Reef. NMFS supports this measure so long as sufficient monitoring and reporting are conducted to document successful re-attachment of the corals. The Jacksonville District's letter also notes several permit special conditions to minimize impacts, including: prohibiting dredging, prohibiting filling beyond what is specifically authorized by the permit, best management practices for controlling turbidity, and best management practices for reducing sound impacts to sea turtles and fish.

The information provided does not address if the floating docks would be re-configured temporarily during construction or as a result of the new sheet pile wall. If this is necessary, NMFS recommends placement of the docks over areas devoid of seagrass and coral.

Recommendations

- NMFS requests the Jacksonville District amend the permit conditions to require relocation for all corals greater than 5 centimeters in diameter and include two years of monitoring to gauge survival and growth of the transplanted corals with respect to clearly established performance criteria. NMFS recommends the permit include quantitative performance criteria and a requirement for remedial action should those criteria not be met.

- In the case that VIPA moves the floating dock, NMFS requests the Jacksonville District amend the permit conditions to require the dock be placed over neither seagrass nor coral.

Species protected under the Endangered Species Act and under the jurisdiction of NMFS may occur in vicinity of the proposed boat ramp replacement. The EAR states that endangered Hawksbill (*Eretmochelys imbricata*) and Leatherback (*Dermochelys coriacea*) sea turtles, and the Federally listed threatened Green sea turtle (*Chelonia mydas*) may be present in the vicinity of the proposed work area and that the proposed site lies within designated critical habitat for the Elkhorn (*Acropora palmata*) and Staghorn coral (*Acropora cervicornis*). Impacts to endangered or threated species and their critical habitat may require consultation with the NMFS Protected Resources Division. Further questions about consultations under the Endangered Species Act should be directed to Dr. Lisamarie Carrubba at Lisamarine.Carrubba@noaa.gov.

Thank you for the opportunity to provide these comments. Related questions or comments should be directed to the attention of Ms. Lia A. Ortiz at NOAA HCD, 3013 Estate Golden Rock, Almeric Christian Federal Building Box 4, Christiansted, St. Croix, US Virgin Islands. She may be reached by telephone at 340-718-1236 or 305-213-3089 or by e-mail at Lia.Ortiz@noaa.gov.

Sincerely,



/ for

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

cc:

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