



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>

May 5, 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: Jesse Helton

Dear Colonel Litz:

NOAA's National Marine Fisheries Service (NMFS) reviewed the letter, dated March 6, 2015, from the Charleston District regarding the proposed maintenance dredging of the Atlantic Intracoastal Waterway (AIWW) at Breach Inlet and Jeremy Creek, Charleston County. The Charleston District last dredged these reaches in 2010. While the District's requests input on the planned maintenance dredging, the District did not initiate an essential fish habitat (EFH) consultation because it believes a past consultation still applies. 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).

The Breach Inlet reach near Sullivans Island is approximately 1.6 miles long and the Jeremy Creek reach near McClellanville is approximately 0.7 miles long. The Charleston District would use a hydraulic cutterhead dredge for the work and pump the dredged material into the confined disposal facilities (CDFs) near each reach. While the authorized width and depth of the AIWW are 90 feet and 12 feet respectively, the District believes it lacks the funds needed to reestablish these channel dimensions. The Charleston District's letter did not specify the amount of dredging within each reach, but District staff later indicated, by email on May 5, 2015, that Breach Inlet Shoal 1 is 100,000 yards to 160,000 cubic yards, Breach Inlet Shoal 2 is 14,000 to 40,000 cubic yards, and Jeremy Creek is 58,000 to 90,000 cubic yards. In that email, the District staff indicated the construction period is estimated to begin in late October 2015 and to end in February 2016.

Salt marsh and tidal creeks occur adjacent to the AIWW and the CDFs at both locations. The South Atlantic Fishery Management Council (SAFMC) identifies salt marsh, tidal creeks, and mudflats as EFH for penaeid shrimp, including white shrimp (*Litopenaeus setiferus*) and brown shrimp (*Farfantepenaeus aztecus*), and for estuarine-dependent species of the snapper-grouper complex. These habitats are EFH because larvae and juveniles concentrate and feed extensively and shelter within these habitats. As a consequence, growth rates are high and predation rates are low, which makes these habitats effective nursery areas. Oysters are common in intertidal areas along the AIWW. The SAFMC designates oyster aggregations as a Habitat Area of Particular Concern (HAPC) for estuarine-dependent species of the snapper-grouper complex. HAPCs are a subset of EFH that is either rare, particularly susceptible to human-induced degradation, especially important ecologically, or located in an environmentally stressed area. The SAFMC provides additional information on these habitats and their support of federally



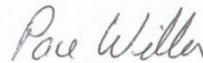
managed species in Volume IV of the *Fishery Ecosystem Plan of the South Atlantic Region*¹. Species managed by the Mid-Atlantic Fishery Management Council (MAFMC) also occur within these AIWW reaches. The MAFMC designates estuarine waters as EFH for bluefish (*Pomatomus saltatrix*) and summer flounder (*Paralichthys dentatus*). The MAFMC provides details about the EFH requirements of species it manages in amendments to individual fishery management plans and in technical reports².

While the NMFS supports maintenance of the AIWW, maintenance dredging can have environmental impacts, including direct removal or burial of benthic organisms and entrainment of small fish, crabs, and shrimp³. To reduce these impacts, the NMFS recommends dredging be done to the extent practicable during winter months when vulnerable organisms are less abundant. For this area of the AIWW, the preferred dredging window is October 15 to January 31, and the District's estimated schedule is consistent with this window. The NMFS also recommends the dredging contract require best management practices to ensure dredge pipe and other dredge-related equipment are not placed or float into salt marsh areas or intertidal oyster aggregations.

In accordance with section 7 of the Endangered Species Act of 1973, as amended, it is the responsibility of the Charleston District to review and identify any proposed activity that may affect endangered or threatened species and their designated critical habitat. Determinations involving species under NMFS jurisdiction should be reported to NMFS Protected Resources Division at the letterhead address.

The NMFS greatly 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

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¹ Available at safmc.net/EcosystemLibrary/FEPVolumeIV.

² Available at www.greateratlantic.fisheries.noaa.gov/hcd/

³ Johnson, M.R., Boelke, C., Chiarella, L.A., Colosi, P.D., Greene, K., Lellis-Dibble, K., Ludemann, H., Ludwig, M., McDermott, S., Ortiz, J., Rusanowsky, D., Scott, M and J. Smith. 2008. *Impacts to Marine Fisheries Habitat from Nonfishing Activities in the Northeastern United States*. NOAA Technical Memorandum NMFS-NE-209, Northeast Regional Office, Gloucester, Massachusetts. 322 pages.