



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 12, 2015

F/SER47: KH/pw

(Sent via Electronic Mail)

Col. Thomas J. Tickner, Commander
Savannah District, Corps of Engineers
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

Attention: William Rutlin

Dear Colonel Tickner:

NOAA's National Marine Fisheries Service (NMFS) reviewed public notice SAS-2014-00862 dated April 28, 2015. To improve a 24.4-mile segment of U.S. Highway 84/State Route 38 in Clinch and Ware Counties, the Georgia Department of Transportation (GDOT) requests authorization from the Department of the Army to temporarily impact approximately 40.61 acres of jurisdictional wetlands and 0.19 acres of open water ponds and to permanently impact 93.14 acres of jurisdictional wetlands, 0.70 acres of open water ponds, and 121 linear feet of intermittent stream. The Savannah District has determined the proposed work is not within areas designated essential fish habitat. NMFS agrees with this determination and 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 GDOT proposes to improve a 24.4-mile segment of US 84/SR 38 from the City of Homerville in Clinch County to the City of Waycross in Ware County. Proposed improvements include widening the two-lane roadway to a four-lane divided highway with a median ranging from 20 to 44 feet depending on location. The proposed roadwork includes constructing new bridges at each mapped stream location and employing 32-foot grassed medians in areas where large wetlands are adjacent to the existing roadway. In addition, the project proposes to construct a 1.7-mile new bypass to the north of Argyle and a 3.3-mile new bypass to the south of Wahoma.

The public notice indicates approximately 133.75 acres of jurisdictional wetlands would be impacted by the proposed project, including palustrine emergent and forested wetlands. These communities experience seasonal to permanent inundation when overbank flooding occurs. Bald cypress, tupelo, American sycamore, river birch, sweetgum, and red maple dominate the canopy. Arrow arum, cattail, and rushes are among the common emergent vegetation. The loss of freshwater wetlands could adversely affect water quality as this habitat filters pollutants, stabilizes riparian shorelines, and facilitates transport of organic material. Consideration of the losses to these habitats and the ecosystem services they provide is important during construction.

The public notice also describes impacts to jurisdictional streams and open waters that would permanently eliminate or temporarily disturb habitats used by aquatic organisms. The NMFS recommends the Savannah District also examine downstream impacts in its analysis. The Suwannee and Satilla Rivers and their tributaries are spawning areas for anadromous fish. Sediment and toxicant input into streams



and rivers is a major threat to anadromous fish and their habitats. This input can directly impact individuals and spawning aggregations as well as permanently eliminate migration and spawning habitat.

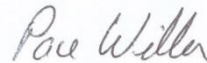
As compensatory mitigation for unavoidable impacts to jurisdictional wetlands in the Satilla watershed (HUC 03070201), the GDOT proposes to debit 41.58 wetland credits from its Echols Tract Mitigation Site in Pierce County (this bank was established for GDOT's use by permit SAS-1994-09213). The remaining 12.99 credits needed would be purchased from another federally approved mitigation bank whose primary or secondary service area includes the Satilla watershed. As compensatory mitigation for unavoidable impacts to jurisdictional wetlands in the Upper Suwanee watershed (HUC 03110201), the GDOT proposes to obtain approximately 880.38 credits from the Cecil Bay Mitigation Bank and to purchase 363 stream credits from the Georgia Land Trust In-Lieu Fee Program. Assuming the projected credits are available, the NMFS supports the proposed mitigation for each watershed with one note. The worksheets describe 0.03 acres (1306.8 square feet) of impacts to an ephemeral stream (Stream 7b - Suwannee Creek) as "Roadway outfall ditch with low sinuosity; approximately 4-6 feet wide and 3-4 inches deep; mud substrate." However, in the Wetlands and Open Waters Stream Mitigation Worksheets; Adverse Impact Factors for Riverine Systems Worksheets, there is no impact factor for ephemeral streams, only intermittent and perennial streams.

Recommendation

NMFS recommends the permit require Best Management Practices (BMPs) throughout all phases of construction, including (1) ensuring all efforts are made to avoid toxicant input into surface waters and wetlands and (2) deploying a Sediment Control Fence (SCF), silt curtains, or other sedimentation and turbidity control barriers to minimize sediment input into waters and wetlands adjacent to construction and staging areas. Regular inspections and timely maintenance of all BMPs, including the SCFs, is necessary to minimize sediment and toxicant input into project-adjacent waters.

Thank you for the opportunity to provide these comments. Please direct related questions or comments to the attention of Keith M. Hanson at our Charleston Area Office, 219 Fort Johnson Road, Charleston, South Carolina 29412-9110, Keith.Hanson@noaa.gov or by phone at (843)762-8622.

Sincerely,



/ for

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

cc: COE, William.M.Rutlin@usace.army.mil
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