



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>

June 3, 2015

F/SER47: KH/pw

(Sent via Electronic Mail)

Lt. Col. John Litz, Commander
Charleston District, Corps of Engineers
69A Hagood Avenue
Charleston, South Carolina 29403-5107

Attention: Stephen Brumagin

Dear Colonel Litz:

NOAA's National Marine Fisheries Service (NMFS) reviewed joint public notice 2012-00588-DS dated May 20, 2015. To improve the existing U.S. Highway 85 (I-85) and U.S. Highway 385 (I-385) interchange, an 8.5-mile segment of I-85 and a 2.75-mile segment of I-385 in Greenville and Spartanburg Counties, the South Carolina Department of Transportation (SCDOT) requests authorization from the Department of the Army to impact 0.242 acres of jurisdictional wetlands from cut and fill activities, 1,070 linear feet (lf) of streams from placement of fill and structures, and 0.186 acres of open waters from cut and fill activities. The Charleston 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 SCDOT proposes to improve the existing I-85 and I-385 interchange as well as I-385 and I-85 as the roadways approach and travel through the interchange in Greenville. Proposed improvements include constructing additional travel lanes on both I-85 and I-385 at the interchange. The proposed project also includes improvements to existing roadways, structures and ramps along an 8.5-mile segment of I-85 from approximately 3.5 miles south of the I-85/I-385 interchange to five miles north of the interchange and a 2.75-mile segment of I-385 from approximately 1 mile north of the I-85/I-385 interchange to a location approximately 1.75 miles south of the I-85/I-385 interchange.

The public notice indicates approximately 0.242 acres of jurisdictional wetlands would be impacted by the proposed project. The loss of freshwater wetlands could adversely affect water quality as this habitat filters pollutants and facilitates transport of organic material. Consideration of the losses to these wetlands and the ecosystem services they provide is important during construction.



The public notice also describes impacts to 1,070 lf of jurisdictional streams and 0.186 acres of open waters that would permanently eliminate or temporarily disturb habitats used by aquatic organisms. The NMFS recommends the Charleston District also examine downstream impacts in its analysis. The Enoree River and its tributaries have spawning areas used by 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 nursery and spawning habitat.

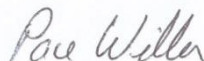
As compensatory mitigation for unavoidable impacts to jurisdictional wetlands and streams from the proposed project, the SCDOT proposes to purchase 2.8 wetland mitigation credits and 5903.8 stream mitigation credits from the Grove Creek Mitigation Bank. The NMFS supports use of this bank as the source of mitigation credits for the proposed I-85/I-385 interchange.

Recommendation

The NMFS recommends the permit require Best Management Practices (BMPs) throughout all phases of construction. Specific BMPs include (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

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