



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>

July 2, 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: Chelsea Bowman

Dear Colonel Litz:

NOAA's National Marine Fisheries Service (NMFS) reviewed public notice 2015-00528, dated June 1, 2015. The Town of Edisto Beach requests authorization from the Department of the Army to dredge and fill 257.6 acres of ocean bottom and intertidal beach for beach nourishment in Colleton County. No compensatory mitigation is proposed. The Charleston District's initial determination is the dredging and filling would not have substantial individual or cumulative adverse impacts on essential fish habitat (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

The proposed work includes dredging 420,000 to 835,000 cubic yards of sand from two borrow areas (Area A is 103.3 acres; Area B is 41.3 acres) within the northern shoal of the South Edisto River Inlet (approximately 0.7 to 1.5 miles from the beach) and placing the sand along 19,000 linear feet of beach from the southern end of the island up to and including Edisto Beach State Park. Sand would be excavated using a hydraulic dredge to a maximum depth of -16 feet mean lower low water (MLLW). A pump station may be used to reach the more northerly sections of beach. A low dune may be constructed where no dune features are currently present.

The Town of Edisto Beach would also lengthen up to 26 existing groins using steel, aluminum or vinyl composite sheet piles. Each 20-foot sheet pile would be driven to established grade and finished with a concrete cap set with a top elevation of -1 to -2 feet NAVD. Stone would be placed around the sheet pile as toe armoring. Loose stones on groins 29 to 32 would be restacked and grouted to make more solid structures. Groin lengthening would be restricted to no more than 100 feet per groin and, in total, would not exceed 1,765 linear feet. The final amount of sand placed on the beach is dependent upon the amount of groin lengthening possible with the Town's budget.

The proposed project is similar in scope to the authorized, but not yet funded, federal project which would nourish Edisto Beach extending from 600 feet north of groin 1 (in the state park) to Big Bay Creek. The Town's plan includes nourishment of all of the shoreline bordering the camping section of the state park (3,300 feet measured north from groin 1) and the front beach from groin 1 to groin 29. The proposed dredging depth of the federal project is -10.3 feet below grade. There are also minor differences in groin lengthening and limited dune construction. The NMFS provided comments on the draft and final Environmental Assessment prepared by the Charleston District for the federal project. On October 28,



2013, NMFS provided two EFH conservation recommendations which the Charleston District adopted. On May 8, 2014, NMFS concluded EFH consultation for the federal project.

Essential Fish Habitat in the Project Area

The EFH Assessment the Charleston District prepared for the *Integrated Feasibility Report and Environmental Assessment, Coastal Storm Damage Reduction, Edisto Beach, Colleton County*, and the comments the NMFS provided on EFH descriptions require no augmentation for this public notice and are incorporated here by reference.

Impacts to Essential Fish Habitat

The dredging of sandy shoals to -16 feet MLLW may result in finer, muddy sediments infilling into the borrow area changing the benthic community structure (e.g., Bergquist et al. 2008 and 2009). Due to these impacts, the South Carolina Department of Natural Resources (SCDNR) recommends restrictions on dredge pit depths and locations. Specifically, mining of ebb-tidal shoals for sand should occur on the downdrift end of beaches to promote faster recovery of the benthic community impacted by the dredging. The borrow area proposed for the Edisto Beach nourishment meets this recommendation; however, SCDNR also recommends dredging depths be limited to avoid creating deep pits where fine grain material can settle. A monitoring plan would aid in identifying impacts from the project to inform future management decisions.

On the beach, impacts include increased turbidity during filling and burial of benthic community. Based on the compatibility of the borrow and beach sands, infaunal benthic communities, such as surf clams and polychaetes, are expected to recover within one to two years. The applicant is requesting authorization for one event; therefore, cumulative impacts from multiple nourishment events are not a concern.

EFH Conservation Recommendations

Section 305(B)(4)(A) of the Magnuson-Stevens Act requires the NMFS to provide EFH Conservation Recommendations for any federal action or permit which may result in adverse impacts to EFH. Therefore, the NMFS recommends the following to ensure the conservation of EFH and associated fishery resources:

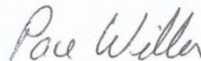
- The permit should limit dredge depths within the borrow area to depths shown by modeling or empirical studies to fill with beach compatible material; pits should not be created and a sand lens should be maintained.
- The permit should require a monitoring of the sediments and benthic communities returning to the borrow area.
- The permit should not allow the pump station and pipeline to impact hardbottom habitat.

Section 305(b)(4)(B) of the Magnuson-Stevens Act and implementing regulation at 50 CFR Section 600.920(k) require the Charleston District to provide a written response to this letter within 30 days of its receipt. If it is not possible to provide a substantive response within 30 days, an interim response should be provided to the NMFS. A detailed response then must be provided 10 days prior to final approval of the action. The detailed response must include a description of measures proposed by the Charleston District to avoid, mitigate, or offset the adverse impacts of the activity. If the response is inconsistent with an EFH conservation recommendation, a substantive discussion justifying the reasons for not following the recommendation must be provided.

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.

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: COE, Chelsea.B.Bowman@usace.army.mil
DHEC, trumbumt@dhec.sc.gov
SCDNR, DavisS@dnr.sc.gov
SAFMC, Roger.Pugliese@safmc.net
FWS, Karen_Mcgee@fws.gov
F/SER4, David.Dale@noaa.gov
F/SER47, Jaclyn.Daly@noaa.gov

Literature Cited

Bergquist, D., S. Crowe, M. Levisen, R. VanDolah. 2008. Change and recovery of physical and biological characteristics of the borrow area impacted by the 2007 Folly Beach Emergency Renourishment Project. Final Report prepared for the U.S. Army Corps of Engineers, Charleston District. 111 pages

Bergquist, D., S. Crowe, M. Levisen, and R. Van Dolah. 2009. Change and recovery of physical and biological characteristics of the borrow area impacted by the 2007 Folly Beach emergency renourishment project. Final Report prepared by the South Carolina Marine Resources Research Institute, South Carolina Marine Resources Division, Charleston, South Carolina, for the U.S. Army Corps of Engineers, Charleston District. 70 pages