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 13, 2015 F/SER47:JD/pw

(Sent via Electronic Mail)

Col. Marvin Griffin, Commander
Savannah District Corps of Engineers
100 W. Oglethorpe Avenue
Savannah, Georgia 31402-0889

Attention: Barbara Bass

Dear Colonel Griffon:

NOAA's National Marine Fisheries Service (NMFS) reviewed public notice 2014-00922, dated June 11, 2015. The Georgia Department of Natural Resources (GADNR) requests authorization from the Department of the Army to place fill in 0.61 acres[1] of salt marsh for improvements to roads and a barge landing on Ossabaw Island, Chatham County. No compensatory mitigation is proposed. The Savannah District's initial determination is the proposed 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 GADNR proposes to conduct five road improvement projects and to improve an existing barge landing on Ossabaw Island. The island is undeveloped but contains a network of dirt roads to transport supplies, equipment, and vehicles; the barge landing is the loading and unloading facility for the island. The roads would be improved by replacing three causeways fitted with 36-inch pipe culverts (sites 1, 2, and 3) and one causeway without an existing culvert (Big House Causeway) with concrete bridges (40 feet by 12 feet) and rip rap for stabilization. The GADNR would also replace a 36-foot-long wooden bridge with a 60-foot-long concrete bridge with rip rap placed along the bank edges on both ends of each bridge. Rip rap would extend approximately 15 feet from both banks at sites 1, 2, and 3, leaving a two to three feet in the creek bed where no rip rap would be present. The creek bed width at Big House Causeway would be approximately 20 feet wide. In addition to the road improvements, the island's barge landing, currently containing concrete slabs, would be improved by adding a concrete boat ramp, bulkhead, and rip rap.

Essential Fish Habitat in the Project Area
The site of the proposed project includes estuarine emergent wetlands (salt marsh), tidal creeks, and unconsolidated bottom. The South Atlantic Fishery Management Council (SAFMC) identifies these habitats as EFH for penaeid shrimp, including white shrimp (*Litopenaeus setiferus*) and brown shrimp (*Farfantepenaeus aztecus*) 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. The SAFMC also identifies tidal creeks and unconsolidated bottom

[1] While the public notice states the project would impact a total of 0.61 acres of salt marsh, the acreages listed for the five components sum to 0.305 acres.

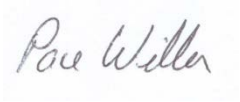
as EFH for estuarine-dependent species of the snapper-grouper complex. The SAFMC provides additional information on EFH and its support of federally managed fishery species in Volume IV of the *Fishery Ecosystem Plan of the South Atlantic Region*[2].

Recommendations
The NMFS requests the Savannah District assess whether the amount of rip rap proposed for the four bridge locations other than Big House Causeway could be reduced to minimize impacts to tidal flow. On July 9, 2015, a consultant froms Environmental Services, Inc., stated the amount of rip rap proposed is based on the velocity of water moving through the existing culverts. Once those culverts and causeway sections are removed, water velocity would decrease suggesting less rip rap would be necessary to protect the shoreline. In addition, the NMFS recommends the Savannah District evaluate the extent of rip rap at the existing timber bridge to determine if the proposed encroachment into the creek is necessary. NMFS has no recommendations for the barge landing.

In summary, the NMFS generally supports bridging tidal creeks in lieu of culverts and appreciates the GADNR electing to use bridges for the work on Ossabaw Island. The NMFS believes the benefits to EFH from removing the causeways would exceed the impacts of the project, especially if the amount of rip rap were reduced. Consequently, the NMFS has no EFH conservation recommendations for the proposed improvements to the road and barge landing on Ossabaw Island.

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

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[2] Available at *safmc.net/EcosystemLibrary/FEPVolumeIV*