



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 6, 2015

F/SER47: KH/pw

(Sent via Electronic Mail)

Col. Marvin L. Griffin, Commander
Savannah District, Corps of Engineers
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

Attention: Natalie Edwards

Dear Colonel Griffin:

NOAA's National Marine Fisheries Service (NMFS) reviewed joint public notice SAS-2015-00087 dated June 16, 2015. To improve a four-mile segment of U.S. Highway 19 (US-19)/State Route 400 (SR-400) in Fulton County, the Georgia Department of Transportation (GDOT) requests authorization from the Department of the Army to impact 2,808 linear feet of jurisdictional streams and 0.46 acres of open water. 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 four-mile segment of US 19/SR 400 from the City of Dunwoody to the City of Sandy Springs in Fulton County. Proposed improvements include constructing new northbound and southbound collector/distributor (CD) lanes along the existing eight-lane SR-400 reconstruction of the Abernathy Road interchange and reconstructing the existing ramps to and from Interstate 285 (I-285) to tie into the CD system. The proposed project would connect to the construction of operational improvements to the SR 400/I-285 interchange (PI 0000784).

The public notice describes impacts to 2,808 linear feet of jurisdictional streams and 0.46 acres of open water 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. Sediment and toxicant input into streams and rivers from construction areas and highways can be a major threat to fish and their habitats.

As compensatory mitigation for unavoidable impacts to jurisdictional streams, the GDOT proposes to purchase 14,130.25 stream credits from the Demorest Lake, Seven Branches Farm, Southern Cross Ranch, Soque River, or Three Creeks mitigation banks. For unavoidable impacts to jurisdictional wetlands, the GDOT proposes to purchase 2.4 wetland mitigation credits from




Soque River or Three Creeks mitigation bank. The impact site and bank sites are within the Upper Chattahoochee River Watershed (HUC 03130001) and share similar hydrological and biological features. Assuming the projected credits are available, the NMFS supports the proposed mitigation.

The 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, Natalie.M.Edwards@usace.army.mil
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