



**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>

September 25, 2015

F/SER47:JD/pw

(Sent via Electronic Mail)

Lt. Col. Matthew Luzzatto  
Charleston District, Corps of Engineers  
69A Hagood Avenue  
Charleston, South Carolina 29403-5107

Attention: David Chamberlain

Dear Colonel Luzzatto:

NOAA's National Marine Fisheries Service (NMFS) reviewed public notice 1980-07280, dated September 15, 2015. George White requests authorization from the Department of the Army to expand a commercial docking facility in Beaufort County. No compensatory mitigation is proposed. The Charleston District's initial determination is construction of the proposed dock 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.

George White would enlarge an existing docking facility at his seafood business in Coffin Creek by connecting a new timber walkway (5 feet by 125 feet) and pierhead (8 feet by 140 feet) to the existing dock. Dock height would be approximately three feet above marsh grass.

The site of the proposed dock includes estuarine emergent wetlands (salt marsh) and unconsolidated bottom. The South Atlantic Fishery Management Council (SAFMC) identifies salt marsh as EFH for penaeid shrimp, including white shrimp (*Litopenaeus setiferus*) and brown shrimp (*Farfantepenaeus aztecus*). Salt marshes are EFH because larvae and juveniles concentrate and feed extensively and shelter within these habitats. Consequently, growth rates are high and predation rates are low, which makes these habitats effective nursery areas. The SAFMC also identifies salt marshes and unconsolidated bottom as EFH for estuarine-dependent species of the snapper-grouper complex. The SAFMC provides additional information on EFH and its support of federally managed species in Volume IV of the *Fishery Ecosystem Plan of the South Atlantic Region*<sup>1</sup>. Coffin Creek, its connecting tidal waters, and the surrounding salt marsh also serve as nursery and forage habitat for other species, such as red drum (*Sciaenops ocellatus*), black drum (*Pogonias cromis*), Atlantic menhaden (*Brevoortia tyrannus*), and blue crab (*Callinectes sapidus*). Many of these species are prey for fish managed under the Magnuson-Stevens Act, such as mackerels, snappers, groupers, billfish, and sharks. Red drum is

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<sup>1</sup> Available at <http://safmc.net/EcosystemLibrary/FEPVolumeIV>



an important state-managed fishery, and estuarine wetlands within the project area provide habitat for all life stages of red drum.

The proposed dock would affect 0.026 acres of salt marsh. Plan drawings show approximately half of the walkway would shade approximately 320 square feet of marsh vegetation. This shading is likely to decrease primary production over time. Temporary vegetation impacts also may occur during construction. The applicant is not planning to construct the walkway within the small finger creeks within the marsh (pers. comm., D. Chamberlain, September 21, 2015).

*Recommendations*

The surrounding marsh contains debris and a derelict, grounded vessel. The NMFS recommends the applicant commit to cleaning up the marsh around the seafood business to offset the impacts of the project on EFH.

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 the 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](mailto:Jaclyn.Daly@noaa.gov).

Sincerely,



/ for

Virginia M. Fay  
Assistant Regional Administrator  
Habitat Conservation Division

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