



Red Bay Environmental

August 9, 2013

Mr. Nelson Lindsay
Richland County Economic Development Office
1201 Main Street, Suite 1400
Columbia, South Carolina 29202

**RE: Biological Assessment Update
196.01-Acre Former Proposed Farmers Market Tract
TMS #R16200-03-20, R16209-01-01, R16200-03-01
Columbia, Richland County, South Carolina
N 33.9367, W 80.9453**

Dear Mr. Lindsay:

Red Bay Environmental is pleased to provide the following information regarding our updated threatened and endangered species review of the above referenced Former Proposed Farmers Market Tract located in Richland County, South Carolina. The tract is located south of the existing intersection of Pineview Road and Shop Road. The northern boundary of the tract consists of Reeder Point Branch and a portion of the southern boundary is adjacent to the 83.87-acre East Richland County PSD Tract identified as Richland County TMS #R16100-02-20. The following information has been prepared pursuant to an update of the prior November 21, 2006 Biological Assessment of the tract and our review of the prior wetland delineation of the tract. This update is being provided in anticipation of future permitting requirements for construction of the proposed extension of Shop Road across the tract and associated commercial/industrial development within the tract.

SITE AND HABITAT DESCRIPTIONS

The tract is located within an area of expanding commercial and industrial development along the US Interstate 77 corridor and is within close proximity to its intersection with US Interstate 26. As a result, the area in the vicinity of the tract has experienced a steady rate of economic development-related growth that is expected to continue into the future. The attached location map and aerial photo exhibit depict the existing conditions of the project area and its surrounding vicinity. Extensive planning and environmental investigation/permitting were initiated for the tract beginning in 2006 as the proposed location of the relocated South Carolina State Farmers Market. The permitting for the project resulted in a 401 Water Quality Certification from the SC Department of Health and Environmental Control (SCDHEC) being issued on March 20, 2007. The location of the Farmers Market was transferred to a nearby location in Lexington County prior to the US Army Corps of Engineers (USACE) Individual Permit being issued for the tract.

Due to the anticipated development of the tract, the upland portion of the site outside of the delineated wetland/waters areas and proposed upland buffer areas was cleared and graded for preparation of construction activities. The attached 2012 aerial photo exhibit depicts the prepared upland area and the undisturbed wetlands/waters and buffer area as they currently exist. Aside from the clearing and grading of upland areas of the tract, the wetlands and associated upland buffers as

designated in the issued 401 Water Quality Certification remain un-impacted and in the same condition that was present during the prior Biological Assessment field reconnaissance.

The prior prepared development area dominates the majority of the acreage of the tract. This area is generally level with no developed canopy or shrub layer. This area of the tract is dominated by juvenile saplings of loblolly pine (*Pinus taeda*) and sweetgum (*Liquidambar styraciflua*) with an herbaceous layer dominated by broomstraw (*Andropogon virginicus*) and dog fennel (*Eupatorium capillifolium*).

The remaining balance of the tract consists of un-impacted wetlands/waters and an associated upland buffer area as indicated on the attached aerial photograph exhibit. These areas remain intact and are consistent with the habitat descriptions contained in the attached prior Biological Assessment of the tract. No harvesting of timber or other land disturbing activities was performed within these areas.

As indicated in the attached prior Biological Assessment of the tract, the project area does not contain the specific habitat requirements of the Federally listed species documented to occur in Richland County, South Carolina as identified by the SC Department of Natural Resources Heritage Trust Program (SCDNR) and the US Fish and Wildlife Service (USFWS). An updated review of the SCDNR Heritage Trust on-line database was performed in early 2012 and again in August 2013 did not reveal any additional data regarding the documented occurrence of Federally listed species within the project boundaries or its vicinity. In addition, the database did not identify any documented Federally listed species within the Fort Jackson South, SC USGS quadrangle. The project site is located approximately in the center of the Fort Jackson South, SC USGS quadrangle.

SUMMARY AND CONCLUSIONS

The updated review of the tract is consistent with the prior findings that the tract does not contain habitat with the specific characteristics preferred by the Federally listed species documented to occur in Richland County. Accordingly, the proposed extension of Shop Road across the tract and commercial/industrial development within the tract is not expected to impact the Federally listed species as documented in the attached March 20, 2007 letter from the USFWS corroborating the findings of the November 21, 2006 Biological Assessment of the tract. No further study of the tract as regards the Federally listed species is recommended at this time.

We appreciate the opportunity to assist you with environmental/natural resources consulting services in association with the proposed project. Please contact me at (843) 810-3311 with any questions regarding this update report of findings, or if you require any additional information.

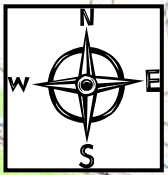
Sincerely,



Judson A. Goff

Attachments: Former Proposed Farmers Market Tract Location Map
Former Proposed Farmers Market Tract Aerial Photograph Exhibit
November 21, 2006 Biological Assessment Report
March 20, 2007 USFWS Letter with Concurrence of Findings

PORTION OF FORT JACKSON SOUTH, SC USGS QUADRANGLE MAP PROVIDED BY SCDNR



PROJECT SITE



USGS QUADRANGLE LOCATION MAP

**196.01-Acre Former Proposed Farmers Market Tract
TMS #R16200-03-20, R16209-01-01, R16200-03-01
Columbia, Richland County, South Carolina**



Red Bay Environmental

JANUARY 29, 2012 PHOTO PROVIDED BY GOOGLE EARTH



2012 GOOGLE EARTH AERIAL PHOTOGRAPH
196.01-Acre Former Proposed Farmers Market Tract
TMS #R16200-03-20, R16209-01-01, R16200-03-01
Columbia, Richland County, South Carolina





Wilbur Smith Associates

November 21, 2006

U.S. Army Corps of Engineers
69A Hagood Avenue
Charleston, SC 29403-5107

1301 Gervais Street (29201)
Post Office Box 92
Columbia, SC 29202-0092
(803) 758-4500
(803) 251-2064 fax
www.wilbursmith.com

ATTENTION: Mr. Travis Hughes

Reference: **BIOLOGICAL EVALUATION**
Farmers Market Site
Richland County, South Carolina
USGS Fort Jackson South Quadrangle
Lat/ 33° 56' 12"N Long/ -80° 56' 43"

Wilbur Smith Associates is pleased to submit this Biological Evaluation of federally threatened and endangered species conducted on behalf of Richland County and the South Carolina State Budget and Control Board as part of our assessment of potential impacts associated with the proposed development. Our on-site pedestrian surveys were conducted prior to any development of the property in anticipation of a federal wetlands permit for construction. It is our sincerest hope that USFWS will review our findings and provide written concurrence for utilization during the permitting process.

An intensive pedestrian survey for wetlands, streams and protected species did not reveal the presence of any federally listed species within or near the boundaries of this site. The most recent data available for federally protected species in Richland County made available by the USFWS and the database of species occurrences maintained by the Heritage Database of the S.C. Department of Natural Resources were consulted. Any federally listed species listed for Richland County by either or both agencies was considered.

It is expected that this project will have no detrimental effects on any federally listed species. No further study of the site is recommended at this time. Please contact me at (803) 758-4785 with any questions regarding this report or if you require any additional information. Thank you in advance for your assistance with this project.

Wilbur Smith Associates

Sanders McMillan
Staff Professional

Red Bay Environmental, File.

Albany NY, Anaheim CA, Atlanta GA, Austin TX, Baltimore MD, Bangkok Thailand, Baton Rouge LA, Binghamton NY, Burlington VT, Charleston SC, Charleston WV, Chicago IL, Cincinnati OH, Cleveland OH, Columbia SC, Columbus OH, Dallas TX, Dubai UAE, Falls Church VA, Greenville SC, Harrisburg PA, Hong Kong, Hot Springs AR, Houston TX, Iselin NJ, Jacksonville FL, Kansas City MO, Kenmore WA, Knoxville TN, Lansing MI, Lexington KY, Lisle IL, London UK, Milwaukee WI, Mumbai India, Myrtle Beach SC, Nashville TN, New Haven CT, Orlando FL, Philadelphia PA, Pittsburgh PA, Portland ME, Poughkeepsie NY, Raleigh NC, Richmond VA, Riyadh Saudi Arabia, Salt Lake City UT, San Diego CA, San Francisco CA, St. Paul MN, Savannah GA, Tallahassee FL, Tampa FL, Tempe AZ, Trenton NJ, Washington DC

Employee-Owned Company

Background and Relevant Listings

Pursuant to Section 7 of the Endangered Species Act, a field survey was conducted within the project area boundary. The following list of threatened (T) and endangered (E) species is from a database last updated in July, 2005 by the U.S. Fish and Wildlife Service. Any species listed by the Heritage Database for South Carolina maintained by the S.C. Department of Natural Resources, verified on November 21, 2006, was also considered.

Animals

Bald eagle	<i>Haliaeetus leucocephalus</i>	T	Known
Red-cockaded woodpecker	<i>Picoides borealis</i>	E	Known
Shortnose sturgeon†	<i>Acipenser brevirostrum</i> †	E	Known†
Carolina heelsplitter†	<i>Lasmigona decorata</i> †	E	Possible†

Plants

Smooth coneflower	<i>Echinacea laevigata</i>	E	Known
Rough-leaved loosestrife	<i>Lysimachia asperulaefolia</i>	E	Known
Canby's dropwort	<i>Oxypolis canbyi</i>	E	Known

†USFWS 2005 County Listings Only – No records for these species in the SCDNR Heritage Database for Richland County.

Methodology

WSA examined the project area on multiple occasions for protected species. The frequency and duration of these trips were intensified by the discovery of a small population of orchids that were out of bloom which upon blooming were determined to be a population of *Platanthera lacera*. The specific ecological requirements of the listed species helped to determine which areas received the most attention, however all areas with potentially suitable habitat were examined for the listed species. Field surveys for protected species were primarily conducted on June 6 of 2006, with several follow-up visits in July and August of that same year.

On-Site Habitat Specifics

The primary entrance to this site will be an extension of Shop Road where it currently terminates into Pineview Road (768). The site will be located south and east of the Norfolk Southern Railway line and will have a fire/emergency road located parallel to that line in the northernmost portion of the site. A gravity, sanitary sewer line will run from the southern portion of the site, along Reeder Point Branch, tying into an existing line north and west of where Longwood Road (SC 960) and Bluff Road join. Every effort has been made to minimize impacts to wetland areas on this site and the Individual Permit application goes into the process of avoidance and minimization that was utilized throughout the design phase. Most of the areas impacted are not pristine wetlands and the majority the highest quality wetland areas are to be placed in a perpetual conservation easement as mitigation for the unavoidable impacts. Soils, hydrology, and vegetation data have been detailed in maps and the upland/wetland datasheets provided to the Corps of Engineers with our verification request packet.

The majority of this site is unimproved agricultural land that has been utilized to raise crops and has most recently been managed for migratory birds. The remainder of the site is forested wetlands (bottomland hardwoods along Reeder Point Branch), planted pines, or mixed pine hardwoods with a dense understory of vines and herbaceous vegetation. There is a 6-acre pond on the site that has been managed for recreational fishing. Much of the stream below the outfall of the pond has been disrupted by beaver activity and any discernable flow is dendritic through the wetlands below the pond to the point where these wetlands join those along Reeder Point Branch.

Reeder Point Branch is a relatively slow-flowing brown water stream that is approximately 15 feet wide from bankfull to bankfull, up and downstream of the proposed bridge crossing. The stream's geomorphologic form most closely resembled a Rosgen's C-Type up and downstream of the project area. At the times of our site visits, maximum depth in the thalweg of the stream did not appear to exceed 1.5 feet and the channel itself was ranged from 8-10 feet wide. The

stream was sinuous and connected to its floodplain, with good coverage within the project area. Banks were well vegetated and comprised of silt and silty loam, with some clay in the lower strata; substrate was predominately sand, silt and small gravel. At the time of our visit the water was relatively clear, despite tannins; aquatic vegetation was moderate. Snags were present up and downstream. There was moderate siltation evident, banks were relatively stable, and bars were aggrading and degrading up and downstream of the proposed crossing. Bank erosion was moderate; however, several utility crossings and runoff from Pine View Road, the railroad, and Shop Road have served to further degrade this riparian habitat.

Species Details and Findings

Haliaeetus leucocephalus (T) – The second largest North American raptor, the bald eagle has a distinctive white head and white tail offset against a dark brown body and wings in adult birds. Bald eagles are opportunistic foragers and diet varies across the range based on prey species available. They prefer fish, but will eat a great variety of mammals, amphibians, crustaceans, and birds, including many species of waterfowl. Bald eagles build large stick nests lined with soft materials and nests are used for several years by the same pair of eagles. Nests measure up to 6 feet across and may weigh hundreds of pounds. The current range of the bald eagle includes all of the conterminous United States and Alaska. The breeding range of the bald eagle is associated with aquatic habitats (coastal areas, river, lakes, and reservoirs) with forested shorelines or cliffs in North America. Throughout their range, they select large, super-canopy roost trees that are open and accessible, mostly conifers. Loss of nesting habitat due to development along the coast and near inland rivers and waterways also has resulted in decreasing numbers. Although said to have been delisted in 2004 by one USFWS reference, the bald eagle is still shown to be threatened by all other recently updated USFWS web documents found. (From – http://ecos.fws.gov/docs/life_histories/B008.html)

No evidence of bald eagle nests were found on or near the project area. SCDNR records did not identify any documented occurrences of this species within the vicinity of the site. The onsite pond was the most likely location for eagle nesting activity, but none was observed near the pond or in the vicinity. Accordingly, the project is not expected to affect this species.

Picoides borealis (E) – The Red-cockaded woodpecker (RCW) is a cardinal sized woodpecker that makes its home in mature pine forests from Florida to Virginia and as far west as Texas and Oklahoma. This woodpecker's back is barred with black and white horizontal stripes; its most distinctive feature is a black cape and nape that encircle large, white cheek patches. The RCW feeds primarily on beetles, ants, roaches, caterpillars, wood-boring insects, and spiders, and occasionally fruits and berries; making its home by drilling cavities into live trees, facilitated in part by Red Heart Disease which causes the heartwood of mature, infected pine trees to become soft enough for excavation, a process that typically takes from 1 to 3 years to complete. Longleaf Pines (*Pinus palustris*) are the preferred species, but other species of mature, southern pines have proven acceptable. RCW groups live in clusters of these cavities and may include 1 to 20 or more cavity trees on 3 to 60 acres. The average cluster is about 10 acres. Cavity trees that are being actively used have numerous, small resin wells which exude sap. The birds keep the sap flowing apparently as a cavity defense mechanism against rat snakes and possibly other predators. The typical territory for a group ranges from about 125 to 200 acres, but observers have reported territories running from a low of around 60 acres, to an upper extreme of more than 600 acres. The size of a particular territory is related to both habitat suitability and population density. RCW live within an extended family group of up to nine members, more typically three or four. Only one pair of breeding birds are found within a group and typically the group raises only one brood a year. Males from the previous season help incubate the eggs and raise the young, while juvenile females typically leave before the next breeding season in search of solitary male groups.

Source: www.fws.gov/rcwrecovery/rcw.htm

No evidence of RCW or suitable habitat was found within the project area. SCDNR records did not identify any documented occurrences of this species within the vicinity of the site. There were some stands of young pines (<15 years old) on the site and some mixed pine/hardwoods as previously described. All areas of mixed pine/hardwoods had a dense understory that would be prohibitive of RCW foraging. Accordingly, the project is not expected to affect this species.

Acipenser brevirostrum (E) -- The shortnose sturgeon is a bony, semi-anadromous fish growing to a length of up to four feet. Shortnose sturgeon exhibit five rows of plates along the body, with olive to black coloring along the back, and yellow to white coloring on the belly. Four barbels are located in front of the mouth and are used to locate food along the river bottom. In South Carolina, shortnose sturgeon are typically found at the freshwater-saltwater interface. Adult and sub-adult shortnose sturgeon are known to inhabit this area during spring through fall. The shortnose sturgeon migrates from salt water to freshwater to spawn from April to May. Spawning occurs every other year for males and every third year for females. Migration of shortnose sturgeons and the extent to which they utilize freshwater habitats vary throughout the species' range. According to Dr. Mark Collins a general rule of thumb is that the species spawns within 200 miles of the mouth of the inhabited river (*Dr. Mark Collins, SCDNR Marine Resources Research Institute – pers comm.*). Spawning in South Carolina occurs from February to April over gravel or rubble bottoms. High current velocity and adequate substrate for the attachment of eggs are important factors in spawning site selection. *Source: Characterization of the ACE Basin, SCDNR/NOAA Coastal Services Center, 2001.*

The project area does not contain suitable habitat for the shortnose sturgeon (see description of Reeder Point Branch for specifics). SCDNR records did not identify any documented occurrences of this species within the vicinity of the site. Accordingly, the project is not expected to affect this species.

Lasmigona decorata (E) – The Carolina heelsplitter is a freshwater mussel that has been eliminated from the majority of its historical range and only six populations are presently known to exist. In South Carolina, there are four small surviving populations—one each in the Pee Dee and Catawba River systems and two in the Savannah River system. In the Savannah River system, one population is found in Turkey Creek in Edgefield and McCormick Counties, and two of its tributaries, Mountain Creek and Beaverdam Creek in Edgefield County; another smaller population survives in Cuffytown Creek, in Greenwood and McCormick Counties. Despite extensive surveys in recent years, no evidence of a population has been found in the Saluda River system. It has been recorded from a variety of substrates (including mud, clay, sand, gravel, and cobble/boulder/bedrock) without significant silt accumulations, along stable, well-shaded stream banks. The stability of the stream banks and stream bottom appears to be a habitat feature essential to the species. Reportedly the Carolina heelsplitter prefers undercuts and along shaded banks stabilized with extensive tree roots, buried logs, and rocks. The best populations are typically found in areas with significant woodland as a dominant land use. Available information indicates that several factors have contributed to the decline and loss of populations of the Carolina heelsplitter, and threaten the remaining populations. These factors include pollutants in wastewater discharges (sewage treatment plants and industrial discharges); habitat loss and alteration associated with impoundments, canalization, and dredging operations; channel and streambank scouring associated with increased storm-water runoff; and the runoff of silt, fertilizers, pesticides, and other pollutants from various land disturbance activities with inadequate or poorly maintained erosion and stormwater control. *Source: http://ecos.fws.gov/docs/life_histories/F02L.html*

The project area does not contain suitable habitat for the Carolina heelsplitter (see description of Reeder Point Branch for specifics). Reeder Point Branch was surveyed on multiple occasions with no signs of utilization by any freshwater mussels, protected or otherwise. SCDNR records did not identify any documented occurrences of this species within the vicinity of the project area. Accordingly, the project is not expected to affect this species.

Echinacea laevigata (E) – Smooth coneflower is a rhizomatous perennial herb that grows up to 1.5 meters tall from a vertical root stock. The stems are smooth, with few leaves. The largest leaves are the basal leaves, which reach 20 centimeters in length and 7.5 centimeters in width, have long stems, and are elliptical to broadly lanceolate, tapering to the base, and smooth to slightly rough. Mid-stem leaves have shorter stems or no stems and are smaller in size than the basal leaves. The rays of the flowers (petal-like structures) are light pink to purplish, usually drooping, and 5 to 8 centimeters long. Flower heads are usually solitary. Flowering occurs from May through July. The habitat of smooth coneflower is open woods, cedar barrens, roadsides, clearcuts, dry limestone bluffs, and power line rights-of-way, usually on magnesium- and calcium-rich soils associated with diabase and marble. Optimal sites are characterized by abundant sunlight and little competition in the herbaceous layer. Natural fires, as well as large herbivores, are part of the history of the vegetation in this species' range; many of the associated herbs are also

cormophytic, sun-loving species, which depend on periodic disturbances to reduce the shade and competition of woody plants. *Source: <http://www.fws.gov/endangered/i/q/saq9m.html>*

The project area contains potentially suitable habitat for Smooth coneflower (powerlines, open woodland areas, and roadsides), but does not contain the soil types preferred by this species. No representatives of the species were observed during the applicable pedestrian surveys conducted during the flowering season for the plant. SCDNR records did not identify any documented occurrences of this species within the vicinity of the project area. Accordingly, the project is not expected to affect this species.

***Lysimachia asperulaefolia* (E)** – The slender stems of the perennial herb, Rough Leaved Loosestrife, grow from a rhizome and reach heights of 1 to 2 feet. Whorls of 3 to 4 leaves encircle the stem at intervals beneath showy yellow flowers. Flowering occurs from mid-May through June, with fruits present from July through October. This species is easily distinguished from the one other similar southeastern species, *Lysimachia loomisii*, by its broader, glandular leaves and much larger flowers. Rough-leaved loosestrife is a species endemic to the coastal plain and sandhills of North Carolina and South Carolina. The single extant site in South Carolina is in Richland County (Fort Jackson). This species generally occurs in the ecotones or edges between longleaf pine uplands and pond pine pocosins on moist to seasonally saturated sands and on shallow organic soils overlaying sand. Rough-leaved loosestrife has also been found on deep peat in the low shrub community of large Carolina bays. The grass-shrub ecotone, where rough-leaved loosestrife is found, is fire-maintained, as are the adjacent plant communities. Suppression of natural fire eliminate the open edges required by this plant. *Source: <http://www.fws.gov/endangered/i/q/saq4b.html>*

There is no suitable habitat within or adjacent to the project area. SCDNR records did not identify any documented occurrences of this species within the vicinity of the project area. Accordingly, the project is not expected to affect this species.

***Oxypolis canbyi* (E)** – Canby's dropwort is a perennial herb growing from elongate, stoloniferous rhizomes to a height of 2.6 to 3.9 feet in height. The stems are hollow and erect with slender leaves. The species is aromatic, smelling like dill. The flowering period is from May through early August. The flowers of Canby's dropwort have white petals and pale green sepals and are five parted. The leaves are round in cross-section, thin, and divided by partitions. The primary habitats of Canby's dropwort are wet pineland ponds and savannas, wet meadows, and around the edges of open cypress ponds. The species prefers habitat with little or no canopy closure. Canby's dropwort prefers soils with a high water table. *Source: [USFWS Recovery Plan \(1990\)](#)*

The project area does not contain suitable habitat for Canby's dropwort. There are no freshwater savannas, wet meadows or open cypress ponds with little or no canopy closure located within the project area. SCDNR records did not identify any documented occurrences of this species within the vicinity of the project area. Accordingly, the project is not expected to affect this species.

Conclusion

No Federally listed species were observed within the project area. Based on lack of suitable on-site habitat and/or no observations of the listed species as a result of field surveys, results of the threatened and endangered species study indicate that the proposed project will have no effect on any threatened or endangered species or critical habitats currently listed by the USFWS.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
176 Croghan Spur Road, Suite 200
Charleston, South Carolina 29407
March 20, 2007



CH

Lt. Colonel Edward R. Fleming
Department of the Army
Charleston District, Corps of Engineers
69A Hagood Avenue
Charleston, South Carolina 29403-5107

Attn: Mr. Colt Bowles

Re: P/N 2007-201-6IJ, South Carolina Department of Agriculture
Richland County, SC

Dear Colonel Fleming:

The U.S. Fish and Wildlife Service (Service) has reviewed the above-referenced public notice dated February 16, 2007. The applicant has requested a Department of the Army permit pursuant to Section 404 of the Clean Water Act to place fill in jurisdictional wetlands associated with Reeder Point Branch in Richland County, South Carolina. This report is submitted in accordance with provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.) and Section 7 of the Endangered Species Act, as amended (16 U.S.C. 1531-1543). This report is also to serve as official comments to the South Carolina Department of Health and Environmental Control in their certification processes

The applicant proposes to fill 4.04 acres of jurisdictional wetlands and 0.26 acres of ditch, clearing 0.35 acres of wetlands and shading 0.23 acres of wetlands associated with Reeder Point Branch. The stated purpose of the project is to facilitate the construction of the proposed new State Farmers Market. The applicant proposes to mitigate for the impacts by preserving 37.01 acres of on-site wetlands and 11 acres of upland buffers. The applicant also proposes to provide any additional required mitigation through the purchase of mitigation credits from an established mitigation bank.

A site visit was conducted on March 7, 2007, by a Service biologist. The riparian area associated with Reeder's Point Branch is vegetated with mature hardwoods. The area proposed to be impacted will provide the main entrance to the Farmer's Market. The proposed road crossing is located near the confluence of Reeder Point Branch and an unnamed tributary. Also, proposed for impacts are edges of the forested floodplain associated with Reeder's Branch.

RECEIVED

MAR 26 2007

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DEPARTMENT OF WATER
QUALITY DIVISION

Forested floodplain wetlands offer important ecological services to both humans and wildlife. This habitat is essential for amphibians and reptiles that use riparian wetlands and seasonally flooded areas to support their lifecycle. Both resident and migratory birds depend on the floodplain region for forage, cover and nesting habitat. Floodplain systems also provide a linkage between upland watersheds and an energy base for downstream food webs. In addition, the wetlands provide ecological services for nearby residents, such as flood control and water quality enhancements through the filtration of sediments and runoff.

Based on the information received, we will concur with a determination that this action will have no effect on federally protected species and/or designated or proposed critical habitat. In view of this, we believe that the requirements of section 7 of the Act have been satisfied. However, obligations under section 7 of the Act must be reconsidered if (1) new information reveals impacts of this identified action that may affect listed species or critical habitat in a manner not previously considered, (2) this action is subsequently modified in a manner which was not considered in this assessment, or (3) a new species is listed or critical habitat is determined that may be affected by the identified action.

The applicant has proposed to protect 37.01 acres of on site wetlands and establishing 11 acres of upland buffers. We have some concerns with the mitigation package and the overall impacts the project may have on the watershed. Given the close proximity of the project to Reeder's Point Branch and the introduction of a large amount of impervious surface into the watershed, we would like to meet with the applicant prior to the issuance of a permit to discuss the mitigation package and the opportunity to utilize Low Impact Development (LID) strategies. We appreciate the opportunity to review and provide comments on the submitted permit at this time. If you should have any questions, please contact Tera Baird at (843)727-4707 ext. 225.

Sincerely,



Timothy N. Hall
Field Supervisor

TNH/TKB

cc: Mr. Chuck Hightower, SCDHEC, Columbia, SC