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## Request for EFH consultation: AL TIG RP/EA #3: Perdido Public Access and Bayfront Park

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January.Murray@noaa.gov <january.murray@noaa.gov>  
To: Christina Fellas - NOAA Federal <christina.fellas@noaa.gov>

Mon, Dec 30, 2019 at 3:41 PM

Hello Christy,

The NFMS has reviewed the Bayfront Park and Perdido Beach projects proposed in the Alabama Trustee Implementation Group Restoration Plan #3. The EFH assessment information provided is incomplete as both projects require hydrographic modeling to fully assess impacts to EFH. The NMFS recommends both projects complete engineering and design to avoid, minimize, and mitigate for unavoidable impacts to EFH. Additional comments are attached.

Thank you,  
January Murray



On Mon, Dec 2, 2019 at 12:53 PM Christina Fellas - NOAA Federal <christina.fellas@noaa.gov> wrote:

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### 2 attachments

-  **Bayfront Park Restoration - NMFS Comments 11-12-19.pdf**  
48K
-  **Perdido Beach - NMFS Comments 11-13-19.pdf**  
48K

**Bayfront Park Restoration and Improvement Phases II a-b Project**  
**NMFS Early Consultation Comments (11/12/19)**

NOAA's National Marine Fisheries Service (NMFS) has reviewed the "RP III Final EA Clean for Review," "Appendix I Rare and Projected Species," and "RP3 Forms Draft" for the Bayfront Park Restoration and Improvement Phases II a-b project. The applicant proposes shoreline and park improvements in Mobile County, Alabama through construction of (1) an approximately 10-acre sand pocket beach with 360 feet of breakwaters and 800 feet of groins, (2) access roads, concrete parking pads, aprons, and sidewalks, (3) playground, pavilion, and restrooms, and by (4) replacing and expanding an existing boardwalk with overlooks for approximately 2,250 linear feet. Construction of the sand pocket beach with groins and breakwaters would result in the permanent conversion of approximately 10-acres of existing estuarine intertidal EFH habitat to hard bottom. Additional EFH impacts to estuarine intertidal marsh would occur through the replacement and expansion of the existing boardwalk.

Based upon a preliminary assessment, NMFS believes the wetlands in the vicinity of the project consist of tidally influenced brackish and saline marsh with water bottoms composing a mixture of sand and mud substrates. The proposed project is in an area potentially designated as EFH for various life stages of federally managed species, including red drum, gray snapper, lane snapper, Spanish mackerel, brown shrimp, and white shrimp. The primary categories of EFH, which would be affected by project implementation, are estuarine emergent wetlands, estuarine water columns, and estuarine water bottoms. In addition to being designated as EFH for various federally managed fishery species, wetlands, and water bottoms in the project area provide nursery and foraging habitats for a variety of economically important marine fishery species such as blue crab, gulf menhaden, spotted sea trout, southern flounder, and striped mullet. Some of these species serve as prey for other fish species managed by the Gulf of Mexico Fishery Management Council (e.g., mackerels, snappers, and groupers) and highly migratory species managed by NMFS (e.g., billfishes and sharks). Wetlands in the project area also produce nutrients and detritus, important components of the aquatic food web, which contributes to the overall productivity of the Mobile Bay estuary.

Given the project requires hydrographic modeling and is currently in the engineering and design phase, the NMFS concurs with the USACE assessment recommending the applicant provide a summary report of the model results to verify the breakwater, groin, and beach pocket designs or recommendation for a different design to determine final design/placement of materials to prevent negative impacts on adjacent shorelines and/or sediment transport. Modeling parameters should include littoral drift, yearly winds, fetch, and recent storms. Additionally, unavoidable EFH impacts will require mitigation.

In order to initiate formal EFH consultation on the Bayfront Park Restoration and Improvement Phases II a-b Project the NMFS recommends the applicant provide:

- an alternatives analysis which accomplishes the project purpose with the goal of avoiding or minimizing impacts to EFH.
- an EFH assessment which clearly characterizes, delineates, and quantifies impacts to EFH by habitat type.
- a complete EFH assessment should include all activities associated with this project including a description of measures to avoid, minimize, mitigate, or offset the adverse impacts of the proposed activities on EFH.
- a mitigation and monitoring plan should be developed which fully compensates for all EFH

**Bayfront Park Restoration and Improvement Phases II a-b Project**  
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impacts. To avoid additional mitigation for temporal impacts, NMFS also recommends the implementation of the mitigation plan concurrent with the construction of the development.

We appreciate your consideration of our comments. If you wish to discuss this project further or have questions concerning our recommendations, please contact January Murray at (225) 380-0089, or by email at [January.Murray@noaa.gov](mailto:January.Murray@noaa.gov).

**Perdido Beach Public Access Coastal Protection Project**  
**NMFS Early Consultation Comments (11/13/19)**

NOAA's National Marine Fisheries Service (NMFS) has reviewed the "RP III Final EA Clean for Review," "Appendix I Rare and Projected Species," and "RP3 Forms Draft" for the Perdido Beach Public Access Coastal Protection project. The applicant proposes to fill two acres of beach and install two shoreline protection projects in Baldwin County, Alabama through the use of breakwaters (309 linear feet at Mobile Avenue and 302 linear feet at Escambia Avenue), groins, and native vegetative plantings resulting in the permanent conversion of approximately 611 linear feet of existing estuarine intertidal EFH habitat to hard bottom.

Based upon a preliminary assessment, NMFS believes the water bottoms in the vicinity of the project are composed of a mixture of sand and mud substrates which lack vegetation. The proposed project is in an area potentially designated as EFH for various life stages of federally managed species, including red drum, gray snapper, lane snapper, Spanish mackerel, brown shrimp, and white shrimp. The primary categories of EFH, which would be affected by project implementation, are estuarine water columns and estuarine water bottoms. In addition to being designated as EFH for various federally managed fishery species, wetlands, and water bottoms in the project area provide nursery and foraging habitats for a variety of economically important marine fishery species such as blue crab, gulf menhaden, spotted sea trout, southern flounder, and striped mullet. Some of these species serve as prey for other fish species managed by the Gulf of Mexico Fishery Management Council (e.g., mackerels, snappers, and groupers) and highly migratory species managed by NMFS (e.g., billfishes and sharks).

Seawalls are located on either side of the beach access areas. Hardened seawalls tend to cause scouring to the adjacent properties, and the two public access properties have been eroding over time. Given the project requires hydrographic modeling and is currently in the engineering and design phase, the NMFS concurs with the USACE assessment recommending the applicant provide a summary report of the model results to verify the breakwater, groins, and pocket beach designs or recommendation for a different design to determine final design/placement of materials to prevent negative impacts on adjacent shorelines and/or sediment transport. Modeling parameters should include littoral drift, yearly winds, fetch, and recent storms. Additionally, unavoidable EFH impacts will require mitigation.

In order to initiate formal EFH consultation on the Perdido Beach Public Access Coastal Protection Project the NMFS recommends the applicant provide:

- an alternatives analysis which accomplishes the project purpose with the goal of avoiding or minimizing impacts to EFH.
- an EFH assessment which clearly characterizes, delineates, and quantifies impacts to EFH by habitat type.
- a complete EFH assessment should include all activities associated with this project including a description of measures to avoid, minimize, mitigate, or offset the adverse impacts of the proposed activities on EFH.
- a monitoring plan should be developed documenting pre- and post-project conditions.
- a mitigation plan, if deemed necessary, should be developed which fully compensates for all EFH impacts. To avoid additional mitigation for temporal impacts, NMFS also recommends the implementation of the mitigation plan concurrent with the construction of the development.

**Perdido Beach Public Access Coastal Protection Project  
NMFS Early Consultation Comments (11/13/19)**

We appreciate your consideration of our comments. If you wish to discuss this project further or have questions concerning our recommendations, please contact January Murray at (225) 380-0089, or by email at [January.Murray@noaa.gov](mailto:January.Murray@noaa.gov).