



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

August 17, 2005

Colonel Mark S. Held
District Engineer
Department of the Army, Corps of Engineers
P.O. Box 889
Savannah, Georgia 31402-0889

Dear Colonel Held:

The National Marine Fisheries Service (NMFS) has reviewed the May 25, 2005, report titled "Development of the Hydrodynamic and Water Quality Models for the Savannah Harbor Expansion Project" (Models) provided by Mr. Joseph Hoke of your staff. We have coordinated with U.S. Fish and Wildlife Service and U.S. Geological Survey staff and we have reviewed their technical comments and recommendations.

Development of the Models has been a lengthy process with extensive interagency technical review steps. Based on our review of the report and the comments of the review team members, we believe that the Models will be valuable for use in assessing large-scale impacts to estuarine habitats in connection with the Savannah Harbor Expansion Project. At the same time, we note that the information produced by any mechanistic model cannot fully negate the importance of other science-based environmental assessments. We also note that continuous development and adaptation of the model will be needed once the model runs and outputs are measured against real observed changes in the ecological system that is being studied.

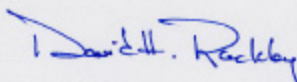
As noted by the U.S. Fish and Wildlife Service in their July 5, 2005, comment letter, an adaptive management approach, as outlined in the Corps' planning guidance (EC-1105-2-409, May 31, 2005) may be appropriate for implementation of the Savannah Harbor Expansion Project and associated environmental mitigation and enhancement features. An adaptive approach, facilitated by careful application of the Models, integrated with a well designed long-term environmental monitoring program, should be considered by the Corps, Georgia Ports Authority, and the interagency team.

NMFS supports application and continued development of the Models for the Savannah Harbor Expansion Project. We appreciate the opportunity to work with you and your staff during development of the Models, and we look forward to their application.



Please direct related questions or comments to the attention of Mr. Prescott Brownell at our South Atlantic Branch Office. He may be reached at P.O. Box 12559, Charleston, South Carolina 29422, or at (843) 953-7204.

Sincerely,



Miles M. Croom
Assistant Regional Administrator
Habitat Conservation Division

cc:
GADNR
SCDNR
USFWS