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*Park:* Federal Agencies - other than NPS  
*Project:* DWH NRDA Restoration - Louisiana  
Deepwater Horizon Oil Spill Louisiana Trustee Implementation Group Draft  
*Document:* Strategic Restoration Plan and Environmental Assessment #3: Restoration of  
Wetlands, Coastal, and Nearshore Habitats in the Barataria Basin, Louisiana

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*Comments:* February 5, 2018 <http://www.gulfspillrestoration.noaa.gov/restoration-areas/louisiana>

Dear Louisiana Trustee Implementation Group (LA TIG),

The Restore the Mississippi River Delta Coalition appreciates this opportunity to provide comments on the "Draft Strategic Restoration Plan and Environmental Assessment #3: Restoration of Wetlands, Coastal, and Nearshore Habitats in the Barataria Basin, Louisiana (DSRP)." In brief, we strongly endorse the preferred restoration strategy detailed in the DSRP to address injury in the Barataria Basin caused by Deepwater Horizon oil spill.

We applaud the LA TIG's effort to prepare a DSRP to restore ecosystem-level injuries in the Gulf of Mexico through restoration of critical wetlands, coastal, and nearshore habitat resources and services in the Barataria Basin.

We agree that an ecosystem-level restoration strategy is the best way to address injury to resources in Barataria Bay. The DSRP clearly details the process used by the LA TIG to refine the broader overview of restoration contained in the PDARP/PEIS to a basin-wide strategy and specific projects. Planning ahead in this way helps the public understand the longer term vision for restoration, and allows the LA TIG to apply restoration approaches and techniques strategically and efficiently.

We agree that restoring the natural deltaic processes via sediment diversions is critical to addressing injuries at the appropriate scale and in a manner that is sustainable. The DSRP notes the sediment-starved condition of the Barataria Basin and the importance of introducing sustainable sediment delivery to allow these marshes to survive. In addition, we appreciate the LA TIG's recognition of the unique role that sediment diversions play in reestablishing deltaic processes and

restoring coastal ecosystems. Large scale sediment diversions provide ecosystem-wide benefits that cannot be realized by any other technique.

The DSRP also affirms that sediment diversions can be employed synergistically with marsh creation projects and ridge restoration projects to "yield a greater net gain than any of these techniques individually." In fact, the LA TIG proposes a preferred alternative that relies on a suite of restoration approaches and techniques in the Barataria Basin, including large-scale sediment diversions to restore deltaic processes, marsh creation, and ridge restoration. We agree that large scale sediment diversions, marsh creation, and ridge restoration are the right combination of restoration techniques to address the ecosystem-wide damages in the Barataria Basin.

We are very pleased with the clear, stepwise process by which the LA TIG evaluated restoration approaches and projects for their applicability and inclusion in the DSRP. The ways that existing information - - such as the programmatic and restoration goals of the PDARP and PEIS, and the modeling and selection of coastal projects in Louisiana's Comprehensive Master Plan for a Sustainable Coast - informed the LA TIG are carefully explained in the document. The DSRP charts a logical and science-based path through the levels of selecting specific projects as candidates for further evaluation. Criteria used for decision-making are included, these criteria are applied to projects one by one, and the thought process behind each screening decision is presented. In all, we believe that the DSRP provides a commendable level of transparency and insight into the LA TIG's selection of a Preferred Alternative.

We endorse the specific projects selected to advance for further evaluation and planning, including the Mid Barataria Sediment Diversion (MBSD). The MBSD will produce results of the scale needed to help restore damage incurred as a result of the 2010 Deepwater Horizon oil spill disaster at an ecosystem-level, and to address Louisiana's "Coastal, Wetland, and Nearshore Habitat" injuries under the settlement terms. We appreciate the DSRP's thoughtful connection between the MBSD draft Environmental Impact Statement (EIS) that is in its initial phases under the direction of the Army Corps of Engineers, and the proposed Phase 2 restoration plan examination of impacts of the MBSD by the LA TIG. As proposed in the April 2017 Notice of Intent to prepare the DSRP, this sets the stage for coordinated and comprehensive examination of the environmental impacts of the MBSD.

We also hope that the coordinated approach envisioned by the LA TIG will provide opportunities to shorten the timeline on the path to permitting and construction of the MBSD project.

Finally, we note that the Draft SRP includes some information about the "sequencing" of projects proposed for further evaluation and planning. We agree that the efficient and timely use of all of the sediment resources available is important, and that the concept of sequencing as explained briefly in the DSRP has merit. We hope that the TIG is also considering how variables including the timing of funding availability and ongoing environmental reviews will affect the proposed sequencing of projects.

Thank you for the opportunity to comment on the DSRP. In summary, restoration in the Barataria Basin has the potential to provide significant benefits to the entire Gulf

of Mexico ecosystem. The DSRP is a significant step toward implementation of critical projects in the Basin. We strongly support the TIG's preferred strategic alternative, and the decision to advance select projects for additional evaluation and planning. We look forward to the LA TIG's continued coordination with the USACE on the MBSD EIS, and the opportunity it presents to condense the currently posted permitting timeline.

We again thank the LA TIG for their thoughtful efforts, and look forward to continued collaboration as we strive to restore the Louisiana coast.

Sincerely,

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Kimberly Davis-Rheyer Executive Director Coalition to Restore Coastal Louisiana

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