

# RESTORE

## THE MISSISSIPPI RIVER DELTA



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November X, 2018

Colonel Michael N. Clancy  
District Commander, New Orleans  
U.S. Army Corps of Engineers  
Executive Office  
7400 Leake Ave., New Orleans, LA 70118

Dear Mr. Clancy and CWPPRA Taskforce:

The Restore the Mississippi River Delta Campaign is dedicated to large-scale, ecosystem restoration in the Mississippi River Delta and the Caminada Headlands is a priority project for all of our organizations. The Caminada Headlands Back Barrier Marsh Creation Increment II project is an excellent example of a CWPPRA project that can help achieve the vision of the Louisiana Coastal Master Plan and sustain our coast for a more resilient future. We believe that this project should be a priority for the CWPPRA program and Technical Committee to advance for Phase II funding.

As organizations with long-standing interest in CWPPRA coastal projects, we are pleased to see progress toward final design and future construction on the EPA's Caminada Headlands Back Barrier Marsh Creation Increment II project (BA-0193), and would like to indicate our full support of funding construction (Phase II) of this project through CWPPRA PPL28.

The adjacent beach area of the Caminada Headlands Back Barrier Marsh project is identified as Critical Habitat for Piping Plovers and provides important nesting habitat for Least Terns, Wilson's Plovers, and Common Nighthawks, whereas the nearby wetland marshes and mangroves support nesting Seaside Sparrows, Green Herons, and other wetland species. We believe that an abatement plan should be developed, and we are confident that such a plan or other avoidance measures can be achieved to minimize impacts to these birds. Audubon Louisiana ornithologists offer their support and guidance in helping to navigate and mitigate against nesting and endangered species disturbance issues during construction, as consultation with LDWF and USFWS moves forward.

We appreciate and approve of adjustments to project design elements that will make Increment II contiguous with Increment I, which will provide synergistic benefits for habitat protection and sustainability and will provide more contiguous habitat for wildlife. The habitat will provide important foraging areas for a wide variety of migratory shorebirds experiencing population declines, including Piping Plovers, adjacent to roosting sites on the restored dunes of the Caminada Headlands. Non-breeding habitat availability and quality is suspected to be one of the biggest challenges to migratory shorebird conservation in the Americas as noted by the [U.S. Fish and Wildlife Service's U.S. Shorebird Conservation Plan](#).

Construction of the back barrier components will stabilize recently completed beach renourishment projects along the Caminada Headland and, thus, the time is now to construct Increment II to maximize these realized benefits. Adding 110 acres of restored habitat to 554 acres while staying within 25% of the approved Phase 0



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cost estimate will provide additive benefits. In addition to the cost benefits provided by constructing Increments I (BA-0171) and II at the same time, these projects will also provide protection to the fragile interior marshes higher up in the basin as well as increase the fortification of infrastructure including Port Fourchon, the Lower Lafourche Levee System, and the Greater Lafourche Port Commission properties. Constructing both projects will also likely reduce the need for road closures of Highway 1 from coastal flooding by reducing storm surge in the basin.

We greatly appreciate the considerations of such a worthwhile restoration effort and are pleased to see CWPPRA continuing their efforts to provide funding for much needed projects. This process has already provided immense support for coastal restoration and continues to push forward projects consistent with the Coastal Master Plan. We hope these comments underscore both the urgency of project implementation and continuing fiscal responsibility as we work together toward a sustainable coast.

Sincerely,

Natalie Snider  
Science Policy Director  
Environmental Defense Fund

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- cc: Brad Inman, CWPPRA Program Manager, U.S. Army Corps of Engineers, New Orleans District  
Johnny Bradberry, Executive Assistant to the Governor for Coastal Activities, Governor's Office  
Charles W. Maguire, Director of Water Division, U.S. EPA Region 6 Water Division  
Jeff Weller, Program Supervisor, U.S. Fish and Wildlife Service  
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Christopher Doley, Director NOAA Restoration Center, National Oceanic & Atmospheric Administration



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