

RESTORE

THE MISSISSIPPI RIVER DELTA



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August 14, 2019

Louisiana Department of Environmental Quality
P.O. Box 4314,
Baton Rouge, LA 70821-4314

Re: Comments on the 2019 Louisiana Nutrient Management Strategy: Protection, Improvement and Restoration of Water Quality in Louisiana's Water Bodies

Dear Louisiana Department of Environmental Quality Nutrient Management Interagency Team,

Thank you for the opportunity to express our support for the *Nutrient Management Strategies for the Protection, Improvement and Restoration of Water Quality in Louisiana Water Bodies*.

Restore the Mississippi River Delta Campaign (MRD) is a coalition of National Audubon Society, the Coalition to Restore Coastal Louisiana, Environmental Defense Fund, National Wildlife Federation, and Lake Pontchartrain Basin Foundation, representing thousands of Louisiana members and supporters. We work together to advocate for science-based restoration efforts in coastal Louisiana. MRD is dedicated to large-scale, ecosystem restoration in the Mississippi River Delta. We commend this forward thinking strategy that combines efforts to reduce nutrient input into our watershed with efforts to restore and sustain our coastal wetlands that can help filter out nutrients.

Sediment diversions use the power of the Mississippi River itself to move sediment, nutrients and fresh water from the river into nearby basins, mimicking nature's historic land-building processes. These projects not only build new land but also provide an ongoing source of sand and mud necessary to sustain and increase the health of existing wetlands over time. In addition to building land, they decrease salinity, improve resiliency and long-term sustainability against relative sea-level-rise by increasing growth rates and soil accumulation. They improve hydrology by increasing flow-through and increase primary productivity and ecosystem function while maintaining healthy populations and biodiversity.

As this report attests, they also play a valuable role and are one of the most important strategies in removing nutrients from the Mississippi River when they are specifically sited to empty into degraded wetlands. Just as our agricultural crops need nutrients to flourish, our wetland plants can utilize the nutrients to grow and become healthier. This mechanism can eliminate a substantial amount of nutrients from the water before it gets to open water bodies like Barataria Bay or the Gulf of Mexico.

We are especially pleased to see it recognized in the report that the existing diversions - Davis Pond, Caernarvon, Naomi and West Point a la Hache - have demonstrated that the wetlands in the outfall area can assimilate a noteworthy amount of total nitrogen and total phosphorus. This report also provides model results for Total Nitrogen and Total Phosphorus removed from the river by future diversions -- included in the Master Plan of 2017-- such as Mid Barataria, Mid Breton, and West Maurepas, all projects that the MRD have designated as priorities for funding and construction. Construction of these diversions and others will



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significantly reduce the total nutrient load of the Mississippi River, which would have otherwise entered into the Gulf of Mexico, contributing to one of the largest hypoxia zones in the world.

Sediment diversions are an innately flexible restoration tool that can be modified and adapted over time based on outcome and conditions desired and the best available science. We greatly appreciate the consideration of such worthwhile restoration efforts. We are writing to express our support for the timely construction of these diversion projects seeing their colossal value in not only building land but also contributing to healthier wetlands and reducing the GOM's immense 'dead zone.' We hope these comments underscore both the urgency of diversion project implementation and continuing transparency and fiscal responsibility as we work together toward a sustainable coast.

Sincerely,

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