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September 6, 2019

United States Army Corps of Engineers (USACE), New Orleans District (MVN)
Attn: Regulatory Branch
7400 Leake Avenue, New Orleans, LA 70118

Re: CPRA's application for USACE Permit 408-MVN-2019-0019, *Mississippi River Reintroduction into Maurepas Swamp in Multiple Parishes*

Dear Mr. Blanke,

Thank you for the opportunity to express our support for the Coastal Protection and Restoration Authority's (CPRA) Mississippi River Reintroduction into Maurepas Swamp in Multiple Parishes project. We write to urge you to approve this permit request, and to encourage collaboration between the Corps (USACE) and CPRA on using this project as mitigation for the **West Shore Lake Pontchartrain** civil works project.

The 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.

We have designated the Mississippi River Reintroduction into Maurepas Swamp as a priority project¹ for coastal Louisiana as this reintroduction would restore the flow of freshwater, nutrients and suspended sediment to the Maurepas swamp, mimicking a natural distributary. It would improve hydrology by increasing flow-through and decreasing salinities; improve resiliency and long-term sustainability against relative sea level rise by increasing growth rates and soil accumulation; and it would increase primary productivity and ecosystem function while maintaining healthy populations and biodiversity in one of the nation's largest swamps.

Historically, the swamp received sediment from the Mississippi River, which helped it keep pace with subsidence and sea level rise. The swamp was cut off from the natural connection with the Mississippi River by levees and by the closure of the Bayou Manchac distributary in 1814, a closure made permanent in 1826 by the State of Louisiana. This project restores part of that lost critical ecosystem functionality.

Swamp forests provide important ecosystem services. Swamps improve water quality by assimilating nutrients and trapping sediment, store flood waters, provide habitat for wildlife, store carbon, provide opportunities for commercial and recreational fishing and hunting, provide recreation and tourism opportunities and are culturally important. Additionally, swamp forest provides storm surge protection during hurricanes and, when compared to other forest types, sustain lower levels of wind damage.

¹ <http://mississippiriverdelta.org/restoration-solutions/priority-restoration-projects/>



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Swamps, in the influence area of this project, like many wetlands in Louisiana, suffer from a severed connection to the Mississippi River, starving them of fresh, oxygenated water, nutrients and sediment. This river reintroduction would re-introduce the flow of these much-needed elements into the existing swamp. Providing fresh, oxygenated water will push out stagnant waters that are often hypoxic and limit tree growth rates and survival. Pulsed nutrients would also help tree growth and survival. The sediment input, mostly silt and clay, would help build the swamp forest floor high enough so that natural regeneration may occur. Nutrient inputs, increased plant biomass, and more oxygen, would lead to increases in net primary productivity, resulting in cascading ecosystem benefits.

Currently, in some areas in the Maurepas region, swamps appear healthy but swamp trees are not reproducing because they never experience necessary dry down periods for seeds to germinate. This freshwater diversion would help restore some areas to healthy, regenerating swamps for generations to come. Our local organizations, the Coalition to Restore Coastal Louisiana and the Lake Pontchartrain Basin Foundation, have planted tens of thousands of trees in the area, which would benefit from the influx of sediment and freshwater from this proposed project.

When constructed, this project will provide much needed support for the Maurepas Landbridge, which is a critical line of defense for East Baton Rouge as well as communities around Lake Maurepas. To accommodate changing goals and restoration needs for the region, we recommend that the diversion structure, as well as the outfall management system, be designed to incorporate operational flexibility to address changing environmental conditions through an adaptive management program.

West Shore Lake Pontchartrain Mitigation

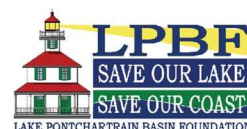
MRD coalition applauds USACE-MVN for evaluating utilization of this diversion as mitigation for the West Shore Lake Pontchartrain project. We strongly encourage you to do so.

We have long advocated for, and continue to hope for, genuine and effective coordination of restoration efforts among Federal and state agencies. Such coordination is a goal of USACE as well, as outlined in the Gulf of Mexico Regional Ecosystem Restoration Strategy:

“The Task Force seeks to improve cooperation and coordination among various federal, state, tribal and local entities, reduce duplication of efforts, and help align and move forward sustainable resource management strategies, restoration plans and resiliency projects”²

² *Gulf of Mexico Regional Ecosystem Restoration Strategy*, Gulf Coast Ecosystem Restoration Task Force, December 2011, p. 12

https://archive.epa.gov/gulfcoasttaskforce/web/pdf/gulfcoastreport_full_12-04_508-1.pdf



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This has recently been reinforced in Gulf Coast Ecosystem Restoration Council, Comprehensive Plan Update:

“the Council recognizes that coordination and collaboration among members and our restoration partners is critical to the success of Gulf restoration. The Council hereby reaffirms its commitment to such coordination and collaboration.”³

Few projects have a longer history of USACE and interagency support than **Mississippi River Reintroduction into Maurepas Swamp in Multiple Parishes**, which has gone through several iterations of planning and name changes, including *Small Diversion at Hope Canal*, which began as a CWPPRA Task Force project, and was thereafter listed among the Louisiana Coastal Area (LCA) critical near term projects.

Having undergone years of interagency and public review, the Hope Canal project is in a good position to move forward expeditiously within the LCA Plan.

*The Hope Canal project offers an excellent opportunity to capitalize on existing environmental and engineering information to provide near-term environmental benefits to an area of critical need.*⁴

Based on this background, the Corps recommended the project as one of the five near-term features in LCA. Here is language from the LCA [recommendation chapter](#):

Studies or design of the five near-term features have been advanced to a state of readiness that suggest the feasibility-level decision documents can be completed prior to the next WRDA. In addition, initial analysis indicates that these five features address the most critical ecological needs of the coastal area in locations where delaying action would result in a “loss of opportunity” to achieve restoration and/or much greater restoration costs. These five critical near-term features present a range of effects essential for success in restoring the Louisiana coast. The benefits provided by these features include: sustainable reintroduction of riverine resources; rebuilding of wetlands in areas at high risk for future loss, the preservation and maintenance of critical coastal geomorphic structures; preservation of critical areas within the coastal ecosystem; and, the opportunity to begin to identify and evaluate potential long-term solutions.

The five near-term critical restoration features that I recommend for specific Congressional authorization...

1. *MRGO Environmental Restoration Features*
2. **Small Diversion at Hope Canal**
3. **Barataria Basin Barrier Shoreline Restoration**

³ Gulf Coast Ecosystem Restoration Council, Comprehensive Plan Update, 2016, *Restoring the Gulf Coast’s Ecosystem and Economy*, p. 24
https://www.restorethegulf.gov/sites/default/files/CO-PL_20161208_CompPlanUpdate_English.pdf

⁴ <https://www.lca.gov/Library/ProductList.aspx?ProdType=0&folder=1125>



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4. *Small Bayou Lafourche Reintroduction*
5. *Medium Diversion with Dedicated Dredging at Myrtle Grove*

In other words, in 2004 the USACE told Congress that this project was among the top five most important near-term projects in coastal Louisiana.

Mississippi River Reintroduction into Maurepas Swamp would be directly adjacent to the USACE West Shore Lake Pontchartrain levee. The long term ecosystem benefits would more than mitigate for bottomland hardwood and swamp habitat that is lost through the construction of the West Shore Lake Pontchartrain project. This would be accomplished in the habitat being affected, which conforms to USACE's mitigation goals and priorities. The Corps/EPA [compensatory mitigation regulations](#) put a strong emphasis on aligning mitigation with watershed plans. Using part of the Maurepas Diversion benefits for mitigation would be fully consistent with the watershed plan for the area, which is *Louisiana's Comprehensive Master Plan for a Sustainable Coast 2017*.⁵ Using the restoration project to mitigate for the risk reduction project aligns perfectly with a major premise of the mitigation regulations and policies.⁶

Restoration and long-term sustenance of the swamp forest adjacent to the levee would provide additional synergistic effects for the risk reduction project by reducing wave energy against the system during storms and helping to stave off saltwater intrusion as relative sea level increases. Saltwater is an obvious threat to levee integrity, as USACE well understands, and places additional costs on the local sponsor.

An opportunity such as this for partnership with the state, the parishes involved, the Pontchartrain Levee District, with the RESTORE Council, and with other Federal agencies working for restoration of Louisiana's coastal ecosystems, should not be missed. Cost savings through coordinated land acquisition, mobilization and contracting should also be explored.

⁵https://www.epa.gov/sites/production/files/2015-03/documents/2008_04_10_wetlands_wetlands_mitigation_final_rule_4_10_08.pdf (Page 80 of 113)
Watershed plan means a plan developed by federal, tribal, state, and/or local government agencies or appropriate non-governmental organizations, in consultation with relevant stakeholders, for the specific goal of aquatic resource restoration, establishment, enhancement, and preservation. A watershed plan addresses aquatic resource conditions in the watershed, multiple stakeholder interests, and land uses. Watershed plans may also identify priority sites for aquatic resource restoration and protection. Examples of watershed plans include special area management plans, advance identification programs, and wetland management plans.

⁶ To quote the regulatory requirement (emphasis added): (82 of 113) (c) *Watershed approach to compensatory mitigation. (1) The district engineer must use a watershed approach to establish compensatory mitigation requirements in DA permits to the extent appropriate and practicable. Where a watershed plan is available, the district engineer will determine whether the plan is appropriate for use in the watershed approach for compensatory mitigation. In cases where the district engineer determines that an appropriate watershed plan is available, the watershed approach should be based on that plan. Where no such plan is available, the watershed approach should be based on information provided by the project sponsor or available from other sources. The ultimate goal of a watershed approach is to maintain and improve the quality and quantity of aquatic resources within watersheds through strategic selection of compensatory mitigation sites.*



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We hope these comments underscore the urgency of project implementation through timely completion of the permitting process and ensuing construction as we work together towards a sustainable coast.

Sincerely,

Brian Moore
Legislative Director,
National Audubon Society

Kim Reyher,
Executive Director
Coalition to Restore Coastal Louisiana

Natalie Snider,
Senior Director, Coastal Resilience
Environmental Defense Fund

John Lopez, Ph.D.,
Director, Coastal Sustainability Program
Lake Pontchartrain Basin Foundation

David Muth
Director, Gulf Restoration
National Wildlife Federation

