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THE MISSISSIPPI RIVER DELTA



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4 February 2021

United States Army Corps of Engineers
New Orleans District
Regulatory Branch
7400 Leake Avenue New Orleans, Louisiana 70118

Project Manager
Patricia Clune
Patricia.R.Clune@usace.army.mil
(504) 862-1577
MVN 2014-02026-CE

RE: Proposed Permit Modification for the Caminada Headlands Back Barrier Marsh Creation Project BA-171 and BA-193 in Lafourche Parish MVN-2014-02026-CE

Dear Ms. Patricia Clune,

The Caminada Headlands Back Barrier Marsh Creation Project (BA-171 and BA-193) construction footprint was damaged as result of Hurricane Zeta in October 2020, requiring construction permit modifications. We at the Restore the Mississippi River Delta Campaign, a coalition of non-profit organizations that include the National Wildlife Federation, Environmental Defense Fund, National Audubon Society, Pontchartrain Conservancy, and Coalition to Restore Coastal Louisiana, appreciate the opportunity to comment on the permit modification plan issued on January 18, 2021. In short, we urge the U.S. Army Corps of Engineers to immediately issue the permit modification so that this project can move forward quickly.

BA-171 & BA-193 are critical to providing synergistic benefits to the two Caminada Headlands Dune Renourishment Projects (BA-0143 & BA-0045) and having the project complete before any additional storms would provide cost-savings in the long run. BA-171 & BA-193 will reduce the risk of breaching and serve as a platform upon which sediment moved by storm surge could be more effectively kept within this "system."

Similarly, moving forward with BA-171 & BA-193 quickly will minimize impacts to nesting birds in the area, which will begin in March in the marshes and April on the beaches. Restarting construction quickly and efficiently during the non-breeding season will minimize any potential construction impacts on actively nesting birds, or complications associated with implementing nesting bird abatement plans. Any dune restoration work associated with the permit modification should be completed before April 10, which is the earliest anticipated nesting of beach-nesting bird species found at the site, based on National Audubon Society surveys and data.



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Thank you for providing the opportunity to comment on the permit modification plan and hope that our comments are helpful in moving the project forward quickly. As always, our team of scientists and coastal restoration experts are available to answer any questions regarding our comments and recommendations.

Sincerely,

Brian Moore
Vice President, Gulf of Mexico Policy
National Audubon Society

Kim Reyher,
Executive Director
Coalition to Restore Coastal Louisiana

Natalie Snider,
Senior Director, Coastal Resilience
Environmental Defense Fund

Kristi Trail
Executive Director
Pontchartrain Conservancy

David Muth
Director, Mississippi River Delta and Gulf Restoration
National Wildlife Federation

Steve Cochran
Campaign Director
Restore the MRD

