

# RESTORE

## THE MISSISSIPPI RIVER DELTA



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January 25, 2021

Coastal Protection and Restoration Authority  
Attn: Chuck Perrodin  
P.O. Box 44027  
Baton Rouge, LA 70804

### **RE: Draft Second Amendment to the State of Louisiana's RESTORE Act Multiyear Implementation Plan**

Restore the Mississippi River Delta Campaign (MRD) is a coalition of the National Audubon Society, the Coalition to Restore Coastal Louisiana, Environmental Defense Fund, National Wildlife Federation, and the Pontchartrain Conservancy. Together we advocate for science-based restoration in coastal Louisiana. We represent thousands of Louisiana members and supporters. MRD is dedicated to large-scale, ecosystem restoration in the Mississippi River Delta. As organization with long-standing interest in coastal projects, we are writing to show our support for the second amendment to Louisiana's Multiyear Implementation Plan and the modifications specifically to the Calcasieu Ship Channel Salinity Control Measure Project (aka Calcasieu-Sabine Large-Scale Marsh and Hydrologic Restoration Project).

The Calcasieu-Sabine Large-Scale Marsh and Hydrologic Restoration Project is an important piece to the restoration of southwest Louisiana and was initially meant to address the region's land loss and saltwater intrusion. As this is a priority project for our coalition, we have been following the project closely over the years and met several times last year with the CPRA team and project managers about this project's progress. They reached out last summer to give us an update on where the project was at after data analysis from CRMS stations in the region reported issues the project was not being designed to address. We were pleased to see that CPRA was taking a step back to reassess the project before moving to any construction. This shows that you are making decisions based on the best available science and data, which is important given the limited resources, time and funding available to restore and protect our coastal areas.

In reviewing CPRA's analysis and the second amendment, we believe that the revised project features, including the construction of lake-rim drainage structures that would enable the marshes to drain into Calcasieu Lake more frequently, as well as the large-scale marsh creation and nourishment, will help reduce wetland loss in southwest Louisiana. We support these project features needed to address near-term needs for the region.

However, when the analysis showed that the alternative to isolate the channel did not adequately address additional system stressors subsequently identified, CPRA did not reanalyze previously proposed alternatives, such as a salinity control structures at the mouth of the Calcasieu and at Gum Cove Ridge that could provide multiple long-term benefits. In earlier analysis, the structures and isolating the channel alternatives were shown to have similar benefits, thus isolating the channel moved forward as the less controversial option. However, this current analysis did not evaluate whether the structures are no longer viable options as well considering the new information. We understand that there are multiple stressors to the system, including water levels and salinity;



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however long-term needs of the region, including risk reduction, are unlikely to be achieved without addressing the Calcasieu Ship Channel. We encourage CPRA to continue to evaluate previously proposed project concepts to meet the multiple long-term needs of the region, which include saltwater intrusion, land loss and storm surge reduction. We understand that the selection of projects to analyze for the 2023 is well advanced, however, given this new information, we request that these salinity control structure project concepts be evaluated for long-term implementation in the 2023 Coastal Master Plan as land loss and risk reduction features.

Selecting appropriate performance measures is critical to monitoring project success and identifying appropriate intervention to improve project performance, if necessary. Based on the updated purpose of this project, we recommend considering using number of acres restored and habitat restoration - acres of coastal habitat loss prevented-- as measures of performance success of the project.

The Calcasieu-Sabine Large-Scale Marsh and Hydrologic Restoration Project is a critical component of southwest Louisiana restoration. In addition, ongoing monitoring and decision-making based on the latest science and on-the-ground realities are crucial. We will continue to follow this project as it advances and advocate for comprehensive, large-scale, science-based coastal restoration projects that restore our vital ecosystems and help protect our communities from storms and sea level rise.

Sincerely,

Brian Moore  
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National Audubon Society

Kim Reyher,  
Executive Director  
Coalition to Restore Coastal Louisiana

Natalie Snider,  
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