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Project: DWH NRDA Restoration - Louisiana TIG Draft Restoration Plan/Environmental Assessment #8: Restoration of Wetlands, Coastal, and Nearshore Habitats
Document: Louisiana TIG Draft Restoration Plan/Environmental Assessment #8: Restoration of Wetlands, Coastal, and Nearshore Habitats

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Comments: April 18, 2022

To: Louisiana Trustee Implementation Group (TIG)

Re: Draft Restoration Plan and Environmental Assessment #8: Wetlands, Coastal, and Nearshore Habitats

Dear Trustees-

Restore the Mississippi River Delta Campaign (MRD) is a coalition of the National Audubon Society, the Coalition to Restore Coastal Louisiana, Environmental Defense Fund, the National Wildlife Federation, and the Pontchartrain Conservancy, representing thousands of Louisiana members and supporters. We work together to advocate for science-based restoration efforts to advance an equitable, safer, and flourishing coast for Louisiana's communities, ecosystems, and economy. As organizations with long-standing interest in coastal projects, we are writing to show our support for Draft Restoration Plan and Environmental Assessment #8.

This draft plan represents a major step forward in habitat restoration and coastal protection for communities from St. Bernard to New Orleans, to the Northshore, and the River Parishes. We commend the TIG's effort to prioritize projects where previous investments from National Fish and Wildlife Foundation's (NFWF) National Coastal Resilience Fund, the RESTORE Council, and Coastal Wetlands, Planning Protection and Restoration Act (CWPPRA) could be leveraged and projects moved into engineering and design or construction. We are particularly pleased to see three of our priority projects recommended: East Orleans Landbridge for Engineering and Design funding; Bayou La Loutre Ridge Restoration and Marsh Creation for construction funding; and Bayou Dularge Ridge and Marsh Restoration for construction funding.

East Orleans Landbridge Restoration

New Orleans Landbridge plays a critical role in reducing storm surge in Lake Pontchartrain, enhancing storm protection for over 1.5 million people who live around Lake Pontchartrain and Lake Maurepas, including the cities of New Orleans, Baton Rouge, Metairie, LaPlace, Mandeville, and Slidell. It is key to maintaining the normal tidal flow between the lake and the Gulf of Mexico and is identified by the Army Corps of Engineers as a "Critical Landscape Feature" because it reduces inland surges. Local subsidence combined with the exposure to high wave energy has resulted in rapid retreat of the New Orleans Landbridge shoreline. This area has endured significant erosion, and in some places, the shoreline has retreated as much as 450 feet since 1956.

The East Orleans Landbridge project, which is a part of the larger New Orleans Landbridge, will restore and enhance 1,563 acres of wetlands and create 2,159 linear feet of living shoreline protection features to maintain the structural integrity of the Orleans Landbridge. It will aid in the effectiveness of the Hurricane & Storm Damage Risk Reduction System (HSDRRS) surrounding the Greater New Orleans and protect the Highway 90 hurricane evacuation route. It supports the 2017 Louisiana Coastal Master Plan and will work synergistically with nearby CWPPRA projects including St. Catherine Island Marsh Creation and Shoreline Protection and

Fritchie Marsh Creation and Terracing. The East Orleans Landbridge is also a priority area identified in the City of New Orleans' Resilience Strategy and the Orleans Parish Hazard Mitigation Plan. This project is important for risk reduction and increased resiliency of coastal wetlands to erosion, subsidence, and sea level rise. It is also ecologically significant and provides ecosystem benefits through enhanced wetland and estuarine functions and controls of tidal flow between the Gulf of Mexico and Lake Pontchartrain; it serves as an important habitat for hundreds of species of fish and wildlife, including sturgeon and migratory birds; and helps commercial fisheries such as shrimp and blue crab and recreational fishery such as speckled trout and redfish.

Bayou La Loutre Ridge Restoration and Marsh Creation

The Bayou La Loutre Ridge was formed by a historic distributary of the Mississippi River and now runs through communities in lower St. Bernard Parish. It is an important feature in this portion of southeastern Louisiana that historically influenced hydrology by preventing saltwater intrusion into inland communities. Bayou La Loutre also served as an important habitat by supporting a Live Oak-Hackberry maritime forest, which is critical for a variety of wildlife including hundreds of thousands of migratory birds crossing the Gulf of Mexico. This ridge maintains the integrity of portions of Biloxi Marsh and provides a component of storm protection for the immediate surrounding communities in St. Bernard and for nearby levees that make up the HSDRRS system.

Continuity of the ridge was destroyed with the construction of the Mississippi River-Gulf Outlet (MRGO) canal, which resulted in substantial alteration of the hydrology and severe saltwater intrusion. The State Natural Heritage Program lists the Bayou La Loutre Ridge as critically imperiled. The MRGO rock dam, completed in 2009, was placed near the historic position of the ridge to help restore some of the historical hydrology. Although construction of the rock dam has been extremely valuable in restoring regional hydrology, erosion of the old bayou ridge continues, which increases breaching to backwater areas, subjecting them to further internal erosion. Restoration of the ridge is a critical element in restoring the historical hydrology of the area to reduce the rate of marsh erosion and salinity intrusion. Restoration of Bayou La Loutre Ridge is a Tier 1 priority project in the St. Bernard Parish Coastal Strategy Document. The Bayou La Loutre Ridge restoration project will create 421 acres of marsh and restore approximately 28,855 linear feet of ridge along Bayou La Loutre. It is supported by Louisiana's Coastal Master Plan 2017 and will work together with other regional projects such as Lake Borgne Marsh Creation and MRGO rock dam, to help restore and protect critical coastal habitat and reinforce natural coastal storm protection features. We are pleased to hear that Bayou La Loutre Ridge project's construction will be done alongside Lake Borgne Marsh Creation to save on overall time and cost.

Bayou Dularge Ridge and Marsh Restoration

Bayou Dularge Ridge and adjacent marshes form an important land bridge between the central and lower Terrebonne basins, extending from northeast to southwest. They historically stopped saltwater intrusion into Louisiana's Central Terrebonne marshes. This is also an area of cultural and archaeological significance for the Chitimacha Tribe of Louisiana.

Ridges act as a natural storm surge buffer, protecting landward habitat and communities. The significant breaching of the feature has increased the vulnerability of landward coastal communities to storm surge. The high rate of land loss in the adjacent marshes and the ridge can be attributed to factors such as natural subsidence oil and gas exploration, saltwater intrusion, and increased boat traffic in Bayou Dularge.

Additionally, Grand Pass, which is about 1,000 linear feet-wide, is an artificial channel through Bayou Dularge ridge, south of Lake Merchant. Grand Pass is mainly used by commercial and recreational fisherman as a shortcut to the Gulf, and these activities lead to further erosion of the banks and the bed of the channel. This channel has exacerbated marsh die-off, leading to one of the highest land loss rates in the state.

Maintaining the function of the land bridge is vital for restoring fresh and intermediate marshes. Bayou Dularge Marsh and Ridge Restoration project creates up to 500 acres of marsh and nourishes around 30 acres of the degraded marsh on the south side of Bayou Dularge. The project restores up to approximately 20,000 linear feet of ridge along the southern bank of Bayou Dularge to separate Lake Merchant from Caillou Lake. Large-scale restoration is urgently needed to stabilize these areas and to restore eroding and degraded marsh.

These three project locations are critically important areas for both ecosystem health and community protection. As concerned stakeholders, we strongly support this Draft Restoration Plan #8 and would like to see the work move forward with urgency.

Thank you again for this opportunity to provide public comment.

Sincerely,

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