

RESTORE

THE MISSISSIPPI RIVER DELTA



MississippiRiverDelta.org

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January 21, 2020

U.S. Fish and Wildlife Service
P.O. Box 29649
Atlanta, Georgia 30345

Re: Comments on the Draft Restoration Plan and Environmental Analysis #6: Restore and Conserve Wetlands, Coastal, and Nearshore Habitat

Dear Louisiana Trustee Implementation Group,

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 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. As organizations with long-standing interest in coastal projects, we are writing to show our support for the three preferred alternatives considered in the *Draft Restoration Plan and Environmental Analysis #6* with a total funding of **\$209,798,020**.

1. Golden Triangle Marsh Creation: Estimated Cost - \$50,000,000

The Golden Triangle marsh area, located near the confluence of the Mississippi River Gulf Outlet (MRGO) shipping channel and the Gulf Intracoastal Waterway, is in an area badly damaged by the saltwater intrusion and erosion that followed the dredging of the MRGO. Urgent restoration is strongly needed to maintain the remaining wetlands and the immense value they provide to humans and animals alike. A significant swath of the Golden Triangle is part of the Bayou Sauvage National Wildlife Refuge, the largest urban wildlife refuge in the nation, and forms the refuge's southern boundary. Restoration of this area is critical because it will not only help provide estuarine habitat for fish and wildlife in Lake Borgne and Mississippi Sound, but it will also provide storm surge risk and enhance community resilience for the Greater New Orleans area. This project will also help restore the marsh apron in front of the IHNC surge barrier, a lynchpin of the \$14 billion HSDRRS system. This project is part of the 4,200-acre, \$272 million marsh creation project in the 2017 Louisiana Coastal Master Plan. The Golden Triangle Marsh Creation Project would create and nourish approximately 775 acres of marsh and open water.





2. The Biloxi Marsh Living Shoreline: Estimated Costs - \$66,600,000

Biloxi Marsh, located in Breton Chandeleur Basin, is in St. Bernard Parish and separates Lake Borgne and the Chandeleur Sound. This marsh provides an important line of protection for New Orleans and neighboring communities. Much of the marsh has been lost in this area for years due to wave-induced shoreline erosion. Louisiana's 2017 Coastal Master Plan projects that during a 100-year flood event almost all of Biloxi Marsh would experience flood depths of more than 15 feet. While the closure of the Mississippi River Gulf Outlet (MRGO) helped control salinity intrusion in the area to an extent, widespread restoration through shoreline protection and marsh creation projects is needed. The Biloxi Marsh Living Shoreline project sited in Eloi Bay will provide crucial erosion control in this area by creating 9 to 11 miles of oyster barrier reef, fringing the marsh, while providing a wide suite of benefits including oysters suitable for harvest, filtering water, improving water quality and providing habitat for fish and invertebrates. Biloxi Marsh project is directly adjacent to the state's public oyster seed grounds, so any oyster recruitment could be done from there. This project is expected to prevent the loss of 120-146 acres of land over its 20-year design lifetime.

3. West Grand Terre Beach Nourishment and Stabilization: Estimated Costs - \$92,500,000

West Grand Terre Island is in Jefferson and Plaquemines Parishes. It has been eroded in the past from storm and relative sea level rise, but the major breach was caused by Hurricane Katrina in 2005. West Grand Terre Beach Nourishment and Stabilization project will restore and enhance dune and back barrier marsh habitat to provide storm surge and wave attenuation. This project is estimated to build 195 acres of beach and dune, 165 acres of intertidal marsh habitat and 14,100 feet of protected shoreline to protect the restored marsh. The project will increase the width of the island and maintain shoreline integrity through the introduction of sediment in order to increase island longevity. Barrier island restoration projects are often touted as beneficial to nesting birds, but can also have unanticipated negative consequences. As an example of such unintended consequences, Audubon Louisiana's monitoring efforts in Cameron, Lafourche, and Jefferson Parishes have demonstrated increased use of renourished beaches by Least Terns (and to a lesser degree by Black Skimmers), but also high rates of nest depredation. Because no predator management program was anticipated in advance of those projects, Least Tern breeding productivity was substantially lower than its potential. As such, we encourage the development of an explicit strategy or program to monitor and manage mesopredators (e.g., coyotes, raccoons, etc.), along with an adaptive management strategy to effectively respond to such threats to maximize the value of this project to nesting seabirds.



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We appreciate the development of screening criteria that emphasizes the need for complementary projects in the region, projects that restore multiple habitat types, and opportunities to leverage other funds. In conclusion, we would like to reiterate that these projects are excellent examples of restoration projects that have cleared multiple rigorous criteria set forth by the NRDA process and we are confident that if constructed expediently, they can help achieve the vision of the Louisiana Coastal Master Plan and sustain our coast for a more resilient future. We commend the NRDA TIG for considering them as the top three alternatives to receive funding for construction, operations and maintenance, and monitoring and adaptive management.

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

