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August 30, 2007

RE: Formal Comments on the Draft Integrated Final Report to Congress and the Legislative Environmental Impact Statement for the Mississippi River Gulf Outlet Deep-Draft De-authorization Study – Main Report June 2007

To: Mr. Sean Mickal
USACE PPPMD- Environmental Planning and Compliance Branch
CEMVN-PM
PO Box 60267
New Orleans, LA. 70160- 0267

Dear Mr. Mickal:

Please accept the attached comments submitted by the Lake Pontchartrain Basin Foundation regarding the “Draft Integrated Final report to Congress and the Legislative Environmental Impact Statement for the Mississippi River Gulf Outlet Deep-Draft De-authorization Study – Main Report June 2007”.

LPBF supports the recommended measure to build a dam in the MRGO at Bayou la Loutre, but find that the report is otherwise wholly deficient in addressing the larger legacy of impacts by the MRGO. Six additional recommendations should be included in the MRGO report. The funding needed for these recommendations are far less than a conservative estimate to replace the wetlands which the USACE admits the MRGO impacted.

It is shameful that the report recommends so little for the MRGO closure, but it would be a greater travesty to not construct the proposed rock dam as quickly as possible.

If you have any questions, please do not hesitate to call or email.

Sincerely,

John A. Lopez, Ph.D.
Director - Coastal Sustainability Program
Lake Pontchartrain Basin Foundation
225 294-4998 504 421-7348 cell
johnlopez@pobox.com

Formal Comments on the Draft Integrated Final Report to Congress and the Legislative Environmental Impact Statement for the Mississippi River Gulf Outlet Deep-Draft De-authorization Study – Main Report June 2007

(Referred to as the “Draft Integrated Final Report”)

**Submitted by the Lake Pontchartrain Basin Foundation
August 30, 2007**

The Tentatively Selected Plan in the Draft Integrated Final Report does not meet the objectives stated by the USACE or the State of Louisiana, such as:

In the Draft Integrated Final Report title -“***Integrated*** Final report to Congress and the Legislative Environmental Impact Statement for the Mississippi River Gulf Outlet Deep-Draft De-authorization Study”,

In the Draft Integrated Final Report goals - “Develop a ***comprehensive plan*** to de-authorize deep-draft navigation on the MRGO channel from the GIWW to the Gulf of Mexico”,

In the letter by Governor Blanco in the Draft Integrated Final Report - “***plan for closure, restoration of the extensive wetlands lost as a direct result of the MRGO, and the integration of this closure into the comprehensive hurricane protection plan***”.

The plan only recommends one specific action, which is to plug the channel with a rock dam at Bayou la Loutre. Although we agree with this measure and agree it is the highest environmental priority, the complete absence of other complimentary actions that might be considered as “**Integrated**”, a “**comprehensive plan**” or addressing the significant “**restoration of extensive wetland loss**” clearly does not meet the federal and state mandates for this report or even the title of the Draft Integrated Final Report .

As a participant in the many meetings, I can testify that the USACE staff emphasized during the planning process that stakeholders present their own comprehensive plans and then work toward some consensus, LPBF presented recommendation from its Comprehensive Habitat Management Plan (see attachment). All this planning activity is documented in the Draft Integrated Final Report as part of the planning activities. LPBF and other NGO’s also submitted a consensus plan of recommendation (see attached). However, it is very disturbing that no other recommendations, made individually or collectively, are included in the plan. In spite of strong support for many common recommendations, the report deals with stakeholder “comments” on most of these recommendations with: “This could be considered under LACPR”. This vague bureaucratic language is totally non-committal to all other restoration measures - even those with complete support by all stakeholders.

Most perplexing is that the Draft Integrated Final Report completely ignores the recommend plan made by the USACE just months earlier in the “Mississippi River Gulf Outlet Deep-Draft De-authorization Interim Report to Congress” (see attachment). Four of the six of the

recommendations made here are included in the USACE's recommendation in the interim report. It is disheartening and insulting to the many folks who participated in this process that so many sound recommendations are left out of the MRGO report.

The fact is that if the Corps acts on the one recommendation in the Draft Integrated Final Report, it is taking the cheapest way out of a huge debacle created by their own hands. It's terrific that the channel can be plugged quickly and cheaply (\$13,500,000), but this low cost should allow other money to be used to address other MRGO channel issues, many of which has been well documented by the USACE. The Draft Integrated Final Report acknowledges direct loss of 22,000 acres (Page vi) of marsh or swamp habitats due to the MRGO. A conservative cost estimate to rebuild the equivalent marsh is at least \$570,000,000. This estimate would actually be much higher if the restoration included building wetlands over the MRGO channel. Nevertheless, the recommended rock dam cost is just 2% of the cost to restore 22,000 acres of typical marsh or swamp outside of the channel.

Specifically, we request that the Draft Integrated Final Report include the following additional measures which allow a plan which is more integrated, comprehensive and addresses historic wetland loss:

1) Restoration of the Ridge at Bayou la Loutre.

Specific design information for this was requested by the USACE during the Draft Integrated Final Report planning. This was provided to Greg Miller with USACE.

Cost: \$80M

2) Channel Severance or Constriction at Other Locations.

We recommend three additional plugs of similar design to the dam described in the MRGO report. These would be located between the Bayou la Loutre plug (in the TSP) and the flood gate planned at Bayou Bienvenue. These additional plugs would serve to segment the 20 mile reach of the channel to reduce wave fetch and the channeling of surge water adjacent to the MRGO levee. This will reduce the risk of damage and failure to the MRGO hurricane protection levee.

Cost: \$60M

3) Central Wetlands Swamp Restoration.

Fund the New Orleans Sewage and Water Board project to use treated wastewater for wetlands assimilation and swamp restoration.

Cost : \$50M

Rebuild swamp elevation with piping of dredged material from the Mississippi River into the Central Wetlands area.

Cost: \$100 M

4) Monitoring

The USFWS makes several important recommendations for the USACE in the MRGO report. We concur with the following USFWS recommendation.

USFWS recommendation (MRGO Report):

“The area in and around the total closure structure and key locations from the total closure structure and north as far as Lake Maurepas, if possible, should be monitored to sufficiently determine the hydrologic effects of the closure and to document the changes in circulation patterns, salinity changes, and changes to the hypoxic-anoxic (H-A) zone, which is about 100 square miles in Lake Pontchartrain with the Industrial Canal as the focal point.”

The USACE should fund a five-year monitoring effort jointly through the University of New Orleans and the University of Southeastern Louisiana. Monitoring should focus on changes in water quality, vegetation and fisheries.

Cost \$2M

5) Maintaining existing bank stabilization.

USFWS recommendation (MRGO report):

“The Corps should investigate and seek legislative approval (e.g., project specific, Continuing Authority Program Section 206, etc.) to maintain the existing 9.9 miles of bank stabilization features and jetties that provide erosion protection benefits.”

The new local sponsor should be funded to maintain the 10 miles of bank stabilization features.

Cost: \$20M

6) Violet Diversion.

A freshwater diversion from the Mississippi River at Violet is needed to restore the “Central Wetlands” cypress swamp damaged by the MRGO. A diversion here has very wide support from all the stakeholders. A final report on hydrologic modeling has recently been released by the University of New Orleans (see attachment). This modeling concludes that a diversion at Violet has the potential to achieve the desired ecologic benefits. The state of Louisiana has committed \$50M to this diversion, but additional federal funding is needed. (see attached modeling report)

Cost: Other legislation is pending to fund this diversion. Nevertheless, the Draft Integrated Final Report should include this with the MRGO plan for closure since it provides an integral element of the post-MRGO restoration.

Conclusion

LPBF supports the recommended measure to build a dam in the MRGO at Bayou la Loutre, but find that the report is otherwise wholly deficient in addressing the larger legacy of impacts by the MRGO. The six additional recommendations should be included in the MRGO report. The funding needed for these recommendations are \$200M less than a conservative estimate to replace the wetlands which the USACE admits the MRGO directly impacted. *It is shameful that the report*

recommends so little for the MRGO closure, but it would be a greater travesty to not construct the proposed rock dam as quickly as possible.

Attachments (sent separate email):

- LPBF's Comprehensive Habitat Management Plan
- Mister Go must go -A guide for the Army Corps. congressionally-directed closure of the MRGO
- Violet Diversion modeling report by University of New Orleans
- Preliminary Comprehensive Plan for Deauthorizing the MRGO (USACE Interim MRGO report – Dec 2006)