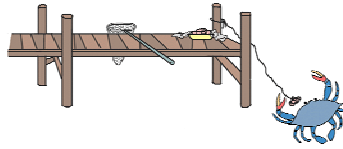




Crab Lines



Barataria-Terrebonne National Estuary Program Final Comments on the Draft CPRA Comprehensive Coastal Protection Master Plan for Louisiana

April 2, 2007

General Comments

The BTNEP Office would like to express our acknowledgement and appreciation for the efforts of the CPRA IPT in putting together a Master Plan. We are intimately familiar with the daunting process of assembling a coherent coastal protection plan, as we went through a similar process in the early 1990s. Our planning process, begun in 1991 with the federal recognition of the Barataria-Terrebonne system as an estuary of national significance, took five years to complete and resulted in the BTNEP Comprehensive Conservation and Management Plan (CCMP). In 1996, the CCMP was approved for implementation by both the state and federal governments. It is through the lens of the CCMP, a plan forged with a high degree of public involvement and multiple stakeholder consensus, that we now view the CPRA's Master Plan. Speaking on behalf of the agreement represented by the CCMP and the BTNEP Management Conference, we offer the following comments.

As with previous drafts of the Master Plan, our most general concern is that it contains restoration measures that do not have broad, multi-sector support. At a minimum, lack of public and agency support will delay restoration progress. Since we obviously do not have the luxury of time, we believe that it is of the utmost importance that the strategies in the state's restoration plan have a broad level of support.

The people of Louisiana have seen too many plans fail to be properly implemented, most often due to the failure to incorporate the "human factor." The best-laid plans of research science and academia have repeatedly struck the impenetrable wall of political and public acceptance. Therefore, finding common-ground solutions and forging stakeholder agreement is absolutely vital to the future success of any plan to restore and protect coastal Louisiana.

The BTNEP approach to ecosystem level restoration is based on a belief that science must be the foundation upon which restoration begins. But science is only the first of a multi-step process. The restoration plans that have been developed since 1996 have failed to take into account the undeniable reality of agency and public acceptance. The reason we find ourselves in a cycle of constant re-planning is because the more

recent restoration plans, whether from government, business and industry, or academic science, have thus far failed to understand socio-political reality. We urge the CPRA to avoid this minefield by focusing on the implementation of coastal restoration measures for which there is known consensus among agencies and other stakeholders.

Delta Management

As a specific example, we refer to the so-called “land building diversions” in Plaquemines Parish. The BTNEP has repeatedly questioned this measure’s inclusion in the plan. Considering the diminished sediment load in the river over the years, its capacity to build land in a reasonable time frame is highly questionable. But the ecological and socioeconomic impacts associated with introducing such massive quantities of fresh water into the estuary would be severe. Our people are willing to accept some change and to modify their behavior. They are not willing to suffer drastic ecological disruptions, or to sacrifice their interests entirely for what is perceived to be the good of the rest. All stakeholder interests should be considered, and none should be entirely marginalized. This measure runs completely counter to the BTNEP CCMP and to the spirit of participation and agreement, which is the only path to implementation.

Page 36 of the plan states that very large land-building diversions are “the only way to sustain large areas of southeastern Louisiana.” This assertion presents a false dichotomy. There are other ways to accomplish this goal, and with fewer impacts to navigation, fisheries, and current use of natural resources. Page 37 discusses some of the “trade-offs” necessary to achieve delta sustainability. What are some of these tradeoffs? Along with the extremely high volumes of fresh water introduced into the Barataria basin, we most likely, will sacrifice many of the current uses of some fishery resources that have sustained a way of life for generations. But will we achieve any meaningful land building with the ancillary protection from storm surges in a time frame that is within reason? Most of the BTNEP restoration community would agree that meaningful land building from any sized diversion, even those of the magnitude proposed in the draft plan would not occur in a time frame that would meet with the public’s current expectations. Additionally, even these proposed enormous water diversions would have no land building effects in the Terrebonne basin where there is a critical and immediate need.

The BTNEP recognizes that diversions of freshwater into the wetlands have been shown to be effective strategies for sustaining marsh by introducing nutrients that spur vegetative growth and by countering saltwater encroachment. We believe diversions are an essential component of comprehensive restoration and overall sustainability. However, diversions must be sized and located appropriately to maximize the benefits and minimize the impacts. Very large or uncontrolled diversions, considering current resource use and ecological change, simply have too great an impact for too little near term benefit and have questionable long term benefit.

CLEAR Model

Regarding Appendix G of the Master Plan, the BTNEP has reservations about the results of the CLEAR model runs that show questionably generous land gains in surprisingly short spans of time for many of the diversions modeled. We question some of the inputs to the CLEAR model, such as total suspended sediment estimates, and we question many of its outputs as well. We feel that the model should not be heavily weighted when making ultimate decisions on restoration measures.

Levees

Regarding levee alignments, the BTNEP has two main areas of concern. First, in the Barataria system, we feel strongly that any levee placed on or south of the Gulf Intracoastal Waterway (GIWW) would result in the unnecessary impounding of vast acreages of internal wetlands. Page 59 of the plan discusses some of these issues. The planners seem to be suggesting that improving water flow to help maintain upper basin wetlands can be compatible with a levee along the GIWW. Perhaps this could be so, but on page 32 of the Master Plan in regard to the interaction between proposed levees and future restoration projects, the planners ask the question, “How can we size and operate (landward) diversions to achieve sheet flow over the marsh?” The obvious answer is that it is not possible to have levees crossing directly over marshes without impeding sheet flow unless they somehow are levitated over the marsh. Current sheet flow will be eliminated or severely restricted unless new levees are carefully placed along existing hydrologic barriers. Although a “leaky” levee system is proposed in wetland areas where there are currently no existing levees, we feel that there can never be enough exchange to properly maintain healthy hydrologic connectivity. All flow will be channelized through gap structures, and thus non-laminar. Therefore, in the Barataria basin, an alignment along Highway 90 is preferable, as a hydrologic barrier already exists there. Although unfortunately not mentioned in the plan, a Highway 90 alignment would enclose less wetland, increasing flexibility in future restoration plans, and maintaining the hydrologic functionality of the systems to the south.

The BTNEP Management Conference is comprised of representatives of many different federal, state, and local agencies as well as representatives of business and industry, agricultural and fishery interests, environmental groups, educators and scientists. While our CCMP is firmly based on science and the realization that placing levees across open marsh can be detrimental, our multi-stakeholder approach to restoration compels our program to incorporate the reality of a more holistic picture. Our coastal landscape is collapsing around us and has created a condition of severe vulnerability to our communities and infrastructure. We can not ignore this. It is clear to us that there are areas that are in need of levee protection from hurricane storm surges. Our CCMP allows us to address seemingly conflicting principals through the application of common ground solutions to these complex issues. When levees are needed for community protection, they should follow existing hydrologic barriers such as road beds or natural ridges and they should allow for maximum ingress and egress of fisheries

organisms. The Morganza to the Gulf levee system was designed with these principals in mind and, as it was originally designed to follow existing hydrologic barriers, is an excellent example of a community protection system that the BTNEP's Comprehensive Conservation and Management Plan can support. We can not support, however, an over-reliance on artificial levees stretched across open marshes in our basins, nor can we support an artificial levee network constructed without an equal effort to rebuild the protective coastal landscape features on the Gulf side. Our communities and our culture can not survive with levees alone, neither can any human-constructed levee.

Our second concern is with the proposals for Plaquemines Parish levee protection, described on page 62 of the plan. Although there may now be fewer residents of the west bank from Myrtle Grove to Venice, the interests of the remaining residents are no less important. There are still businesses, industries, and people attempting to rebuild lower Plaquemines Parish. It seems that the state, by increasing the standard of what constitutes 100-year protection while proposing to maintain the existing levees as they are, has effectively removed the level of certified protection that residents have had for decades. In other words, "maintaining existing levees" does not equate to "maintaining existing protection" as the protection was 100-year and now no longer will be. In no other area of the state have residents been asked to accept a decrease in their level of protection. This proposal is unfair to those residents who are currently rebuilding their lives and businesses, only to just discover that they may no longer enjoy the protection they assumed would continue. The proposal seems to constitute a "retreat" strategy, and as such, should proceed only with a careful and deliberate dialog with the Parish.

Restoration Measures

With the exception of the very large diversions, the BTNEP agrees with the vast majority of the coastal restoration measures in the Master Plan, and sees much agreement with the CCMP. We fully support the use of pipelines for the delivery of dredged sediment for marsh creation. Indeed, we see this strategy as the best alternative for timely land building, and we feel it is underemphasized in the Master Plan. Pages 33 and 34 of the plan discuss the limitations of sediment pumping:

"The wetlands that are built may not function in the same ways as wetlands built through natural processes. In addition, the technique is not sustainable and requires periodic renourishment. Finally, pumping in sediment is expensive, and doing it on a large-scale will require that the state make long-term investments in infrastructure."

Each of these concerns has a counterpoint not discussed in the plan. Although the functions and values of historic and created marshes may not be identical, the immediate introduction of sediments will, at the very least, provide a platform for vegetation, turn open water back to wetland, and improve protection from storms. Sustainability can be achieved with minimal freshwater input from small diversions of the Mississippi River as well as from other sources such as the Atchafalaya River, the GIWW, Bayou LaFourche,

or even storm water redirection. Periodic renourishment with additional sediments will only be necessary when and where it is deemed to be necessary. All coastal restoration projects are expensive. By comparison with other restoration measures, the cost of pumping sediments is not great, considering that it can achieve the reconstruction of landforms so quickly with minimal ecological disruption. There is no other tool in the toolkit that can achieve this -- none. The mechanical delivery of harvested sediments, whether from navigational or dedicated dredging, is an extremely flexible strategy. It can be used not only to create marsh, but also to restore remnant ridges and barrier islands, both essential landforms for habitat as well as hurricane surge protection. Long-term investment by the state in infrastructure to support this strategy would be money very well spent.

The FY 08 Annual Plan Draft and Urgent Early Actions (UEAs)

The Master Plan on page 71 presents six criteria for selecting UEAs for fast-tracking. One of these, "Projects that maintain or reestablish a landscape feature...for restoring or sustaining the flow of water in a given area..." seems suited to selecting marsh creation, ridge reconstruction, and barrier island restoration projects. The BTNEP would like to strongly emphasize that these types of projects will provide habitat and storm protection benefits almost immediately upon construction. As the technology for dredging and pumping is already well developed in state, and the need to reconstruct landforms as soon as possible is so obvious, these projects should be placed at the top of the list of UEAs. We were extremely disappointed to see that a CIAP-approved project for the long-distance transport of sediments by pipeline to sites in three cooperating parishes was not identified for implementation in the FY 08 Annual Plan. We urge the CPRA to reevaluate its selection criteria and to prioritize restoration measures that will provide immediate benefit and visible results.

Additionally, there seems to be an emphasis on "natural" and "sustainable" processes in the criteria. That may be a good guiding principle for long range planning, but the CPRA should not overlook mechanical processes that can satisfy immediate needs. The desire to rely on "natural" processes seems to be blinding the planners to the possibilities afforded by techniques that will quickly build land and provide immediate protection from storms.

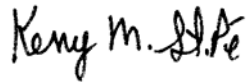
Basic Assumptions

The Master Plan proceeds from three basic assumptions, presented on page 23. These principles form a good starting point, but the BTNEP sees room to go further in our expectations of how we should move forward and what we can accomplish. Stopping wetland loss is an obvious and critical goal, but we believe it is possible, by properly allocating resources, to reconstruct some of what has been lost. It should be our goal to reclaim the protection once afforded us by the wetlands. Maintaining what we have left is simply not good enough, as so painfully demonstrated by the storms of 2005. But all this must be accomplished in a way that respects the positions of all stakeholders. The plan's basic assumptions make reference to understanding the impacts of proposed

restoration actions with the acknowledgement that “seemingly small alterations can have big long-term effects.” Here, again, there is room to go a step further. We must not only recognize and understand the impacts of our actions on the people who live here, but we must do our level best to limit those impacts wherever and whenever we can. In doing so, we will discover more and more public support for restoration actions. This will be the path toward implementation. True consensus is a powerful thing and should be the utmost goal of the CPRA.

The BTNEP greatly appreciates the hard work of the CPRA IPT and the opportunity to comment on the Master Plan. Thank you for the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink that reads "Kerry M. St. Pé". The signature is written in a cursive style with a large, stylized initial 'K'.

Kerry M. St.Pé
Program Director