

Louisiana Coastal Protection & Restoration Authority  
150 Terrace Avenue  
Baton Rouge, LA 70802  
By email to: coastal@la.gov

February 15, 2020

**Re: Comments on behalf of Atchafalaya Basinkeeper, Healthy Gulf, the Louisiana Crawfish Producers Association – West and Sierra Club Delta Chapter on the DRAFT Atchafalaya Basin Program Annual Plan Fiscal Year 2021**

## **I. Introduction**

The Draft Atchafalaya Basin Program Annual Plan for the fiscal year 2020 (hereinafter, “Draft Plan”) briefly discusses the history of the Atchafalaya Basin Program, including the program’s recent move from within the Louisiana Department of Natural Resources (LDNR) to the Coastal Restoration and Protection Authority (CPRA), to be incorporated in its annual plan, and into the state’s Coastal Program. The Draft Plan provides that the FY 2021 Project List, updated water quality priority list, includes the following projects:

1. Henderson Lake WMU Spoil Bank Gapping Project
2. Flat Lake Study
3. Murphy Lake Depth Restoration
4. Buffalo Cove Water Management Project
5. East Grand Lake Upper Region

Atchafalaya Basinkeeper, Healthy Gulf, the Louisiana Crawfish Producers Association – West and Sierra Club Delta Chapter submit this comment letter to CPRA regarding its Draft Atchafalaya Basin Program Annual Plan for the fiscal year 2021, with specific emphasis on the following projects contained in the FY 2021 project list: Henderson Lake WMU Spoil Bank Gapping Project, East Grand Lake Upper Region and Buffalo Cove Water Management Project.

**Atchafalaya Basinkeeper** (ABK) is a non-profit organization comprised of over 1,1000 members dedicated to protecting and restoring the ecosystems within the Atchafalaya Basin for future generations. **Healthy Gulf** (formerly Gulf Restoration Network) is a diverse coalition of individual citizens and local, regional and national organizations committed to uniting people to protect and restore the natural resources of the Gulf of Mexico. **Louisiana Crawfish Producers Association-West** (LCPA) is a nonprofit organization whose purpose is to educate the public and advocate for the right to access navigable waters. Its members are commercial and recreational fishermen, hunters and nature photographers. Its members regularly use the Atchafalaya Basin and other public waters and lands in pursuit of these interests. The members of LCPA have economic, recreational, cultural, historic, spiritual and aesthetic interests in the Basin. **Sierra Club Delta Chapter** is a national, grassroots organization whose mission is to explore, enjoy and protect the wild places of the Earth; to practice and promote the responsible use of the Earth’s ecosystems and resources; and to educate and enlist people to protect and restore the quality of the natural and human environment.

Atchafalaya Basinkeeper, Healthy Gulf, the Louisiana Crawfish Producers Association – West and Sierra Club Delta Chapter reserve the right to rely on all comments to this Draft Annual Plan submitted by any party.

## II. Discussion

First, ABK seeks to express our disappointment in CPRA’s disregard of ABK et al.’s March 9, 2019 Comments and accompanying Exhibits A-E on the DRAFT Atchafalaya Basin Program Annual Plan Fiscal Year 2020, hereinafter “2020 DRAFT Plan Comments” and which are fully incorporated herein, ignoring the all the evidence and science shared through our comments. While CPRA expends millions of dollars on coastal restoration projects to create bird habitat along the coast, projects that have a low probability of a sustainable future in the face of increasing extreme weather events and rising tides, it is simultaneously pushing for river diversion projects in the Atchafalaya Basin that will forever fill the most productive wetlands in the world and arguably most important wetland forests for migratory birds in the Western Hemisphere.

**The billion-dollar landowner flooding lawsuit in Mississippi should be a warning sign that risking millions of people and trillions of dollars on ports and chemical plants’ infrastructure to benefit a very few, powerful corporate landowners may not be a good idea.** See <https://www.northsidesun.com/news-breaking-news-columns/billion-dollar-flooding-lawsuit-gets-ground#sthash.vraMkXrl.dpbs>. *State of Mississippi et al. v. the United States*, Case No. 1:19-CV-00231-EDK, United States Court of Federal Claims.

Second, ABK would like to express its concern regarding a number of reasons why some of these projects have become exceedingly controversial, problematic and unethically personal in nature. In particular, the amount of misinformation that continues to circulate regarding the East Grand Lake project is extremely unsettling, and is a disservice to the public who deserves to receive honest, accurate information about a project proposal with the capacity to greatly impact the long-term health of an area that provides important wildlife habitat, and supports recreational and commercial interests of great economic and social value to this state. Some of the misinformation that is circulated and reported by some of our members is that the project proponents only intend to open gaps along a spoil bank to allow the water to move, not to introduce more river water. Also, claims that the Corps’ Buffalo Cove Project on the west side of the Basin was a failure because the Corps did not make cuts to allow the water to move through, and because the Corps did not make any openings on the lower end of the project area to allow water to move through. However, if the true intent of the project is to allow for natural, sustainable dispersal of north-south flow of water through this area, there should be attempts to include removal of the east to west Williams Canal spoil bank to allow the water to move through the system, but original features of the project to open gaps along the east to west spoil bank of the Williams Canal were removed from the project plans. Instead, the reality is that the 13 cuts proposed for the East Grand Lake Project are all river diversion cuts, and as Exhibit O attached to Atchafalaya Basinkeeper et al.’s comments to the Corps’ public notice for the EGL permit application shows, this will not yield the allegedly intended result of improving water quality and flow in the long-term. See Exhibit B, at Exhibit O to 2020 DRAFT Plan Comments, Ivor L. van Heerden, Ph.D., *Expert Report on Proposed East Grand Lake Project (EGL)* (hereinafter, “van Heerden Expert Report”).

Moreover, in the throes of this controversial and largely unsupported project, proponents have resorted to personal attacks on ABK to garner absent support and because they cannot deny the validity that the project will harm irreplaceable Louisiana swamps. Again, we want to reiterate that these kinds of divisive, deceiving tactics are unacceptable and unwise, especially in the face of growing threats to our communities from coastal erosion, sea level rise and increased extreme weather events. Pitting fishermen against fishermen, neighbor against neighbor, and sharing inaccurate or incomplete information is dividing our communities, and for what? To gather support for projects that will fill the Basin with sediments and put millions of people and the entire industrial corridor along the Mississippi River at a greater risk from a Mississippi River flood year after year. We humbly request that CPRA evaluate the true level of community interest and support in these projects in recognition of the many misrepresentations and harmful rumors that have been circulating around these communities. We also ask that CPRA sufficiently evaluate whether it is in the public's best interest to move forward with these projects at this time where there is a significant void of transparency and diplomacy in sharing information germane to the projects, and lack of input from stakeholders and members of the impacted community to reach a reasonable, scientifically-supported and sustainable solution at the decision-making table.

Unfortunately, as we have observed over the years, the Atchafalaya Basin Program (ABP) has a long history of authorizing project modifications that impair the efficacy of the proposal while benefiting certain powerful interests (often corporate landowners in the Basin), and refusing to work with certain stakeholder groups whose mission is to protect what is left of the Basin's swamps, lakes and bayous for the public. Some of the projects that have been modified to benefit special interest groups include projects at Bayou Postillion, Bayou Fouché, Little Bayou Pigeon, Grand Lake, East Grand Lake and the dam on Brown Bayou. We were hoping that with the Atchafalaya Basin Program now under CPRA, and incorporated with the state coastal plan, the Program would consider the interrelated nature of the Basin's health and the state of our coast, and would have chosen to ensure the efficacy, scientific support, and sustainability of the projects pursued through the basin program for the long-term health of the Atchafalaya Basin, its communities and our state as a whole. However, the continued presence of problematic priority projects in the ABP 2021 Plan, including the East Grand Lake and the Buffalo Cove Water Management Projects, raises specific cause for concern that things have not changed for the better of our communities and we fear for the long-term health and sustainability of the Basin.

**a. Henderson Lake WMU Spoil Bank Gapping Project**

The Henderson Lake Water Management Unit Spoil Bank Gapping Program will address restricted water flows north of Henderson Lake. The restricted flows contribute to water quality issues in the swamps, the lake, and also inhibit flood flows south to the lower basin. The program attempts to help to reestablish more natural north-south water flows present in the Basin will fail if projects are implemented correctly and in a manner conducive to long-term and sustainable water quality restoration. The proposal was for complete removal of the spoil bank and we hope that the project will be changed to completely remove the spoil bank as proposed instead of only making gaps.

**b. East Grand Lake Project (201006)**

The Draft Plan states that the East Grand Lake Project “was intended as a first step toward realigning water flow patterns and strategically redirecting sediment in the East Grand Lake (EGL) project area.” However, as designed, this project will have devastating consequences to an area that is already rapidly filling in with sediment. The project was modified to exclude all the gaps along the Williams Canal that were originally proposed for this project, which means water (and sediment) cannot move freely south because of that pipeline, leaving areas to fill with sand and silt to the north.

The Draft Plan acknowledges the problem with sediment in the area, noting that “the highly channelized flow of water through the School Board Canal (Unnamed Canal), Indigo Bayou, Salt Mine Bayou, Williams Canal, Bayou Pigeon, and the Coon Trap creates a sediment delivery network that carries sediment deep in the area, promoting further restriction of flow and isolation of small areas.” It also notes that to restore the hydrology in the area “requires modifying this network of channelized water inputs.” It is accurate in that restoration or maintenance of the hydrology in this area will require modifications to the current channelized network of water inputs. However, what the ABP has failed to account for is the long-term, detrimental effect the proposed modifications will have on the area. Implementing the cuts pursuant to the current project proposal will cause an introduction of sediment-laden water from Bayou Sorrel and the Gulf Intracoastal Waterway into the area, without an escape route, distributing the sediment in the swamps and areas below the cuts. *See van Heerden Expert Report.* Eventually those cuts will fill in themselves, but TNC represented at a public hearing for the project that it has funding and intends to reopen the cuts, again creating new waves of accretion and destroying more swamps. Thus, although the water flow may be improved in the immediate aftermath of implementing these proposed modifications, the end game will be loss of the wetlands to the south.

Also of concern is the fact that a robust monitoring program language was also used as a way to move the Buffalo Cove and Beau Bayou permits forward. With Buffalo Cove, the monitoring program has done nothing to stop the massive accretion that is taking place and, after talking with St. Martin Parish president Mr. Chester Cedars, St. Martin Parish is not aware of any sediment monitoring program for the Beau Bayou area as required by the Corps permit. It seems that all these projects designed to fill wetlands will use whatever language is required to get the Corps permits with no real intention to actually use those safeguards to protect wetlands. The same thing happened when the Corps approved opening Coon Trap. With Coon Trap, the fishermen were told that opening Coon Trap will not cause accretion problems and it will be closed if it does but still open after 20 years of massive accretion to swamps, lakes and bayous. The same tactics, the same results and the same special interest groups benefiting from the accretion process at the expense of the safety of millions of people and the ecology of our planet.

In consideration of the hardships we have faced in obtaining information related to the project’s monitoring efforts, we have strong concerns with the role of TNC in developing this project and leading the monitoring endeavors. Both TNC and the ABP under LDNR have stated that landowner vision will be at the forefront, and as long as the vision of powerful corporate landowners is at the forefront, we do not anticipate that anything will change to benefit the long-term health of the Basin for present and future generations, or that stakeholders such as the

undersigned organizations will be given proper consideration. The vision of those powerful interest groups is not the health of the Atchafalaya Basin's wetlands, but rather to maximize accretion which will destroy wetlands for personal gain. In supporting these projects as they presently stand, CPRA condones the destruction of the most important ecosystems for migratory birds in the Western Hemisphere and the safety of millions of people in the face of massive Mississippi River floods.

One of individuals responsible for designing some of these projects, including Beau Bayou, East Grand Lake, Bayou LaRose, Mr. Glen Constant from the US Fish & Wildlife Service, communicated to the public, during Atchafalaya Basin Program's public hearings, that those swamps will fill in. It is an undeniable fact that those swamps will fill in, just like the Beau Bayou swamp is filling in because of the Beau Bayou Project, the Buffalo Cove swamps, lakes and bayous are filling in because of the Buffalo Cove Project as shown by LIDAR maps. The same principle that drives Mississippi River diversions can be seen at work in the Atchafalaya Basin, a man-made environmental catastrophe that will have unimageable consequences for our state and our environment on a planetary scale.

The ABP, now under CPRA, continues to refuse to address the source of the problem for nearly all of these projects – the unsustainable input of sediments into the Basin and the west-east impediments to flow and management distribution of sediment in the form of spoil banks and accreted areas in and around spoil piles. As discussed in prior comments, there are a myriad of alternatives to the proposed action, that are both more sustainable and responsive to the source of the existing problems than the EGL project's present design. Any true solution should include modifications and/or outright removal of the existing impediments that will not result in more harm than the status quo. However, the project as proposed will not only fail to restore the hydrology but will accelerate the demise of the wetlands in the project area. I want to remind CPRA how much accretion will take place. Dr. Ivor van Heerden has calculated how much sediment will pass through those gaps:

“So, this EGL project, in just a four-month flood based on 2011 data (Welch et al, 2014) covers 1188 acres with at least 4 inches of sediment, and this is a very conservative estimate. If you review Table 3 (Stations 10 and 11) you will see that the suspended sediment loads measured during the 2011 flood were well below the median of the historical data.” See van Heerden Expert Report at 12.

Dr. van Heerden's findings reflect what we sadly know to be true from our personal, on-the-ground knowledge and observations.

The Draft Plan reports that TNC has initiated a “robust monitoring program,” which “includes a combination of continuously recording instruments and discrete monitoring stations to determine the change in water flow patterns resulting from restoration.” With respect to the ongoing monitoring efforts, we hope to receive more information regarding results, locations at which monitoring has been conducted, methods and more. Unfortunately, despite repeated attempts to obtain information regarding TNC's monitoring efforts for the flood of 2019-20, we have been largely unsuccessful. Under the MOU signed between TNC and the Atchafalaya Basin Program

any records or information furnished to the ABP under this instrument are subject to the Louisiana Public Record Law. TNC refused to provide that data and referred us to CPRA.

The lack of pertinent data keeps making it difficult for our expert to review crawfish research that could be used to support this project. Dr. Van Heerden requested again this year that Nichols University share the data used in Lauren Kong's Thesis, but Nichols University keeps denying the information request. We hope that CPRA will assist in the acquisition of such important information regarding the EGL project so that all members of the public can stay informed and there is transparency throughout the discussion of this pending project.

The 2020 Draft Plan and again the 2021 Draft Plan stated that, as the project progresses, "there will be ample opportunities for public input at TAG and CPRA meetings, which are held throughout the year. Additionally, the CPRA holds public meetings annual to receive input on the CPRA Annual Plan which includes the Basin Plan." However, as shown throughout our 2019 Comments, it does not appear that the majority opposition to the project has had any significant bearing or impact on the project's trajectory towards permitting and implementation at any cost and our comments are completely ignored. The fact that our comments are being ignored and no attempts are made by CPRA to halt or modify the project or even to address our concerns and the facts we presented, give cause for great concern that politics will keep driving the ABP at the expense of the Atchafalaya Basin, citizens of Louisiana and our future generations. Unfortunately, as we continue to witness and have been told directly from individuals within the Atchafalaya Basin Program, our "input" falls on deaf ears. The fishermen and individuals that recreationally and commercially use this area have continually expressed concern that the current project proposal will result in an unsustainable influx of sediment-laden river water into this area that will fill-in these swamps. Despite a showing of total opposition to the project at the 2016 public hearings, under pressure from the project proponents, a few fishermen now support the project, under false pretenses or with hopes of short-term personal gain. LDNR made clear at the public hearing in Henderson in 2016 that even if most community members continue to oppose the project, which LDNR again acknowledged will ultimately result in filling-in of the area, LDNR will nevertheless move forward with the project if the Corps authorizes the activity. Thus, assurances that there will be ample opportunity for public comment appears to serve as a means to placate the public and assure compliance with legal requirements on its face, without affording truly meaningful participation.

The Annual Plan fails to identify what is the cause or causes of eutrophication and hypoxia in interior swamps as well as taking into consideration that the Atchafalaya sediment load moves in the suspended mode. Specifically, the eutrophication is a consequence of the very high nutrient loads principally industrial fertilizer that floods the swamps each flood season. As evidence of the 'spreading dead zone' one does not have to look beyond the 2019 flood where from Texas to Florida coastal waters were dangerous to human and wildlife health because of the algae and bacteria blooms as these extremity rich nutrient loads were introduced into the shallows. This is somewhat akin to the reason we have the dead zone each year in the Gulf and other coastal areas such as Chesapeake Bay. CPRA would be well advised to make itself familiar with the latest scientific findings as concerns eutrophication. Monitoring as proposed and allegedly performed by TNC does not represent rigorous scientific investigation and is not at all a big-picture approach.

Suspended sediment can move great distances even in low channel velocities and is rapidly infilling the Basin. This is a major public safety issue as we are dramatically losing the flood water storage capacity of Basin. The public needs to be made aware of this danger and information that is and should be gathered to better understand the state of the Basin and proposals that impact its future sustainability should be freely available to the public without exception.

**c. Buffalo Cove Water Management Project**

The Draft Plan describes this project as a Corps project designed to improve water circulation and sediment management to enhance fish and wildlife resources in the Buffalo Cove Water Management Unit. The project includes “the improvement of interior circulation within the swamp; the removal of barriers to north-south flow; the input of oxygenated, low temperature river water; and the prevention or management of sediment input into the interior swamps.” However, it is clear thus far from observations on the ground in the Buffalo Cove Management Unit area (BCMU), that these goals have not only been missed, but the destruction and loss of deep-water habitat is being accelerated as a result of the Corps’ manipulations in this area.

As discussed in more detail in ABK et al.’s July 18, 2018 Comments regarding the proposed Buffalo Cove Management Unit – Element 10 and Draft Environmental Assessment (*see* 2020 DRAFT Plan Comments at Exhibit C, referenced and fully incorporated herein) any chance at reconnecting flow to the Atchafalaya River and improving hydrologic connection in the area, including between Buffalo Cove Lake and Ice Box is crippled by the current on-the-ground status, which shows that there remains little to connect. During low water, there is no longer any deep-water habitat to connect to – there is essentially no longer a Buffalo Cove Lake because it has already filled in. Furthermore, Bayou Eugene is completely filled in and Bayou Gravenburg and Jackass Bay are no deeper than 4’ during low water. Ironically, the goals of the project are contrary to the occurrences on the ground since the BCMU pilot project began implementation. Rather than improving the quality of the area, observations of massive accretion resulting in disappearing cypress swamps and deep-water habitat is plaguing the area. Projects like the BCMU created by the Corps are forever destroying valuable wetlands to improve water quality on those wetlands.

The Draft Plan does note, however, that “(s)ome of these elements were impacted by unprecedented high water during the Mississippi River Flood of 2011 and were no longer functioning as designed.” However, this does little to reassure the public and surrounding communities, who in recent years have experienced increasing major flood events in the Basin. Although some degree of impact is to be expected in the wake of unusual high water, as these events become more and more frequent and unpredictable, touches on an important problem of oversimplification, and short-sightedness of the design of many of these types of projects (i.e., failure to account for these events is akin to designing a project with your head buried in the sand).

The Draft Plan includes a photo of the Buffalo Cove Water Management Unit element at Bayou Eugene which it states was repaired after the flood in 2011. However, as noted above, Bayou Eugene is now completely filled in. Even so, the Draft Plan identifies that these elements were repaired in February 2013, and as of June 2016, “the project was considered substantially complete.” Currently, Element 10 remains to be constructed, and was open for public comment in 2018. In our BCMU Comments (2020 DRAFT Plan Comments at Exhibit C), we raise the point

that the Corps has failed to explain how the fate of element 10 will differ from these elements previously implemented in the area, that have led to the accelerated accretion in these areas.

The Draft Plan also notes that once Element 10 is complete, “the State of Louisiana has a cost share of 25% of ongoing operation and maintenance funding for this project.” However, we are wary of the efficacy of these purported “monitoring efforts” and the accuracy of the reporting. As we note in our BCMU Comments, the Corps discussed in detailed in the draft EA for the project that it took extensive pre and post construction monitoring efforts to evaluate the performance of the BCMU elements. BCMU Comments, at 28. And, despite assurances that the project’s effectiveness would continue, and its assurance that it had been collecting data since 1997, the ongoing trend of an expansive buildup of sediment in the area continues.

We further question whether the cost share with the State, and the current budget allotted for the project, is enough to reverse the existing harms and ensure that these areas are restored in the future. Many of these areas, including Bayou Eugene, are already filled with sediment, and restoration would require extensive dredging. The Draft Environmental Assessment that corresponds to the proposed activity at element 10 discusses the monitoring efforts by the Corps and the measuring goals for the monitoring program. However, these efforts either fail in their entirety to detect the sediment accretion in the area that is measurable in feet and continuing to this day, or willfully disregard the rate of accretion in hopes of finally “completing” the project. In the face of the so-called “adaptive management” approach to the project, it is obvious that neither the Corps nor Basin Program actually intend to respond to results of its monitoring efforts, especially in light of the lack of any response following receipt of all the accretion information in our comments. Is there sufficient funding to restore this area and actually improve hydrologic connections and habitat as the project was initially intended to do? Is there funding allocated to perform the extensive dredging that would be required to meet the above-articulated goals and desired outcomes for the project? Are these measures part of the project as it is currently underway and set for completion? Are there funds set aside to provide for future dredging necessary to maintain the area? These pertinent questions remain unanswered.

A report by one of our members is a good example of the situation in Buffalo Cove, “the crawfish never run and when the water started to go down I could not make it to my traps any longer because of the amount of sand that moved from the cuts”.

We again respectfully request that the Atchafalaya Basin Program through CPRA consider the current status of the Buffalo Cove Management Project to date, the efficacy of the previous elements, and the likelihood of success of the final proposed element 10 before authorizing any additional activities in the area beyond maintenance and dredging to restore areas that have already suffered from severe sediment disposal and accretion as a consequence of this project. We encourage the ABP to consider the importance of these areas to wildlife habitat, particularly fish populations, our Cajun culture, and the importance of deep-water habitat and the Basin as a whole in containing floodwaters and protecting countless communities from Mississippi River floodwaters. Finally, we request that the ABP acknowledge the problem – sedimentation and distribution of sediments – prior to authorizing further action that will exacerbate the harm, causing irreparable damage to wetlands.



**d. Flat Lake Study (201501)**

We completely agree that sedimentation is causing loss of access and aquatic habitat in Flat Lake and is detrimental to the overall health of the ecosystem. Sediment accumulation in Flat Lake exacerbates drainage issues and stagnation of interior swamp habitat throughout the Upper Belle River WMU. This study is an evaluation of the lake and its ecosystem to support the design of a restoration project to rehabilitate habitat, improve biological conditions, and reestablish access for the benefit of public use.

The “Overview and Planning Process of the East Grand Lake Water Quality Improvement and Sediment Management Plan” (2010) clearly and correctly identified the Flat Lake area as an important component of the drainage of the East Grand Lake and Upper Belle River WMUs. The study correctly concluded that the hydrodynamic influence of Flat Lake should be quantified as part of the planning process and suggested that decisions regarding the future management of the waterways in and around Flat Lake will have a significant influence on the hydrology and ecology of the Western and Upper regions. Because of its proximity to Coastal Master Plan projects designed to build wetlands in Terrebonne Parish, Flat Lake was chosen as a location for a demonstration project for utilizing Atchafalaya Basin sediments as a borrow source. This study will include analysis of lakebed sediments and will provide that and other information to assess the feasibility of this area as a component of the Coastal Plan. If politics and special interest groups can be kept out of the process, we believe that this study can result on a plan that is critical for the Atchafalaya Basin and our coast.

**e. Depth Restoration at Entrance to Murphy Lake (201512)**

Sediment has closed off access to Murphy Lake in the East Grand Lake WMU in low water conditions, causing water circulation and water quality problems. The project would involve dredging sediment accretion from the entrance of Murphy Lake to improve access and water flow into the lake. This project should be expanded to dredge the entire lake. If implemented correctly, this project will make a huge difference in water quality in the East Grand Lake area, restoring critically needed deep water habitat. This is an example of a project that will not introduce more sediments and will be 100% beneficial. But again, the project should be expanded to dredge the entire lake instead of only the entrance, and funds from the East Grand Lake Project should be re-directed for the implementation of this project.

**III. Conclusion**

The East Grand Lake project should be significantly modified to allow . Instead of cuts to introduce more sediment ridden river water into wetlands, funds need to be used to restore the hydrology by dealing with problematic pipeline spoil banks that impede flow in the area and restoring Lake Murphy.

The Buffalo Cove Water Management Project is a complete disaster. Despite the articulated goals, purpose and need for the BCMU project, this project presents a significant threat to the health of the ecosystems, habitats, fisheries, communities and wildlife of the Atchafalaya Basin and to the ability of the Atchafalaya Basin to handle Mississippi River floods. For the many reasons discussed

herein, in the interest of the public and in accordance with applicable federal and state law, Atchafalaya Basinkeeper, Healthy Gulf, the Louisiana Crawfish Producers Association-West and Sierra Club Delta Chapter respectfully request that the CPRA ask the Corps halt and modify the project to restore deep-water habitat and keep sediments away from the area.

The Flat Lake Study could have huge beneficial impacts to the coast and the ecology of the Atchafalaya Basin if an appropriate plan is developed and implemented as a result of the study. We hope that CPRA will keep it clean of politics for the benefit of the public and the state.

The Depth Restoration at entrance of Lake Murphy should be expanded to include dredging the entire lake and should be a priority for implementation.

The importance of the Atchafalaya Basin for wildlife habitat, recreation, commercial interests, flood control and protection for communities cannot be overstated. The pursuit of projects on the basis of incomplete or inaccurate scientific support, promised yet inadequate monitoring and maintenance, and purported outcomes that fail to come to fruition frustrates the Atchafalaya Basin State Master Plan's mission to conserve and restore the natural habitat of the Basin, and afford the public an opportunity to enjoy the Basin. CPRA itself acknowledges that "a sustainable landscape is a prerequisite for both storm protection and ecological restoration." Coastal Protection and Restoration Authority of Louisiana, *Executive Summary*, Louisiana's Comprehensive Master Plan for a Sustainable Coast, at 3 (2007). Furthermore, the cost of destroying Louisiana's wetlands can be measured in billions of dollars per year. See Coastal Protection and Restoration Authority of Louisiana, Louisiana's Comprehensive Master Plan for a Sustainable Coast, at 74 (2017). In consideration of the connection between coastal resources and the irreplaceable wetlands of the Atchafalaya Basin, the state of Louisiana cannot afford to continue to degrade our wetlands under misguided aims of water quality improvement projects to fail to take into account all the variables that cause any given action or project to succeed or fail.

It is not our mission to stubbornly oppose any or all projects proposed in the name of water quality improvement or sediment management. Rather, we merely seek to provide pertinent, on-the-ground observations, and the collective knowledge of our organizations and invaluable members to facilitate a more sustainable approach to water quality and sediment management that does not come at such a high cost to our communities and our state. However, if we are continually disregarded, our concerns and suggestions ignored, projects such as those discussed herein pushed forward despite robust opposition and acknowledgment of the long-term consequences, public funds expended to fill irreplaceable wetlands, we will all suffer the consequences. ABK, Healthy Gulf, LCPA-West and Sierra Club Delta Chapter respectfully request that CPRA and the ABP work diligently to acquire accurate information regarding the proposed project sites, work with and not against all interested stakeholders to determine the most effective, efficient and sustainable solutions moving forward, and to not authorize projects that the program has itself acknowledged will result in long-term exacerbated harms.

Thank you for your time and consideration of our comments.

Respectfully submitted by,



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On behalf of the following:

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