



LOUISIANA WILDLIFE FEDERATION

The voice of Louisiana's wildlife and natural resources since 1940.

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October 14, 2022

U.S. Army Corps of Engineers Regional Planning and Environment Division South
New Orleans Environmental Branch, CEMVNPDC-C
7400 Leake Avenue
New Orleans, LA 70118
Via Email: tyler.stevens@usace.army.mil

Re: Neptune Pass Rock Closure EA #589 and Finding of No Significant Impact (FONSI)

Dear Mr. Stevens,

Louisiana Wildlife Federation appreciates the opportunity to comment on the “Mississippi River, Baton Rouge to the Gulf of Mexico, Louisiana, Neptune Pass Rock Closure EA #589” and draft Finding of No Significant Impact (FONSI).

Louisiana’s coast is critical to not only the people who live, work, and recreate here, but to the entire nation. World-class fishing attracts people from all over the world. Our ports are a major player in international trade. The nation’s energy needs are largely supported by the oil and natural gas industry located along our coast.

Our coast is disappearing. It is vital that bold action is taken to help protect communities, businesses, and natural resources from the devastating effects of hurricanes, storm surge, and sea level rise. The single biggest thing that can be done to help mitigate some of this loss – and address this crisis – is to allow the Mississippi River to do what it’s done for thousands of years: build land with its sediment and nutrient-rich water. Neptune Pass has provided Louisiana with yet another connection to the river that has resulted in abundant habitat filled with birds, wildlife, and plants – just as has happened in Wax Lake Delta and Mardi Gras Pass.

The US Army Corps of Engineers has an opportunity to better balance navigation needs and ecosystem benefits in the Mississippi River Delta. Without more robust scientific analysis and increased transparency to include stakeholders, decisions made today for a single issue could result in perpetual problems, including harmful impacts to a flourishing ecosystem and significant additional costs in the future.

Scientific study is ongoing in this area to understand the sediment mass balance to investigate if the land being built in Bay Densse and Quarantine Bay are resulting from shoaling of the channel or if that sediment is being delivered from the river. This information is critical to understand.

Additionally, while the Corps may classify this part of the river as “sand lean”, it’s important to note that even lower levels of sand are still resulting in significant land building. Nearby Fort St. Philip is a clear example of this, capturing over 5.6 million tons of sediment per year. Other

“sand lean” areas of the river are also building land including Brant’s Pass Splay, West Bay and Cubit’s Gap. Even parts of the river that offer lower levels of sand, silt and clay still provide enough to increase resilience during storms.

There is other important information lacking in the environmental assessment (EA). There is no mention in the EA about how the proposed structure would change discharge through the pass. There are attempts being made to estimate this number and that information would be helpful to include in an environmental assessment. Additionally, the EA lacks discussion about the placement of rocks and concrete mats to stabilize the entrances of the pass. There has been a lack of transparency in both the process and the development of the proposed rock closure structure despite both state and NGO offerings to help further develop alternatives.

Louisiana is spending billions of dollars on large-scale restoration projects to reverse declines in estuarine habitat for fisheries, wildlife, and sustainable natural resources. The emergence of Neptune Pass has resulted in the creation of a vibrant habitat teeming with biodiversity; it underscores the importance of reconnecting our river to the surrounding estuary to restore and maintain the health and vitality our coast for wildlife and people into the future.

Louisiana Wildlife Federation is a statewide conservation organization representing nearly 8,000 members and 19 affiliate organizations supported by hunters, anglers, hikers, paddlers, birders, campers and other outdoor enthusiasts. Thank you for consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Rebecca Triche". The signature is written in a cursive, flowing style.

Rebecca Triche
Executive Director