



LOUISIANA WILDLIFE FEDERATION

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

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October 14, 2021

U.S. Army Corps of Engineers
Regional Planning and Environmental Division South PDS-C
7400 Leake Ave, New Orleans, LA 70118
Via email: mvnenvironmental@usace.army.mil

RE: West Shore Lake Pontchartrain scoping and notice of intent to publish Supplemental Environmental Impact Statement (SEIS)

Dear U.S. Army Corps of Engineers,

Louisiana Wildlife Federation (LWF) has worked for several years to increase awareness in the River Parishes about coastal restoration projects, focusing outreach efforts on the importance of restoring the Maurepas Swamp region. Of particular focus are diversion projects in the area that would reconnect the Mississippi River to these sinking wetlands – like the River Reintroduction into Maurepas Swamp project (MSP).

Urgent action and innovative approaches are critical to restore our coastal wetlands and protect our communities. As has been our position since the beginning, LWF strongly encourages the USACE to use the MSP as mitigation for the loss of bottomland hardwood and swamp habitat that will result from the construction of the West Shore Lake Pontchartrain levee project (WSLP).

As stated in the Federal Register, the SEIS will “compare, at a minimum, the previously identified BBA Alternative for the WSLP Project in EA 576 to Alternative 1 (MSP–1: Public and Private Lands) and Alternative 2 (MSP–2: Public Land Only) by using the Alternatives Evaluation and Comparison (AEC) process.”

LWF believes that the USACE should select Alternative 2 as compensatory mitigation for habitat impacts resulting from the construction of the WSLP for the following reasons:

- The MSP will be built adjacent to the WSLP. These two projects share construction features, offering an opportunity for cost savings and efficiencies by doing the projects in tandem.
- Utilizing the MSP would keep mitigation in-basin and directly adjacent to the impacts rather than relying on piecemeal mitigation in other areas.
- The long-term ecosystem benefits of the MSP would more than provide mitigation for bottomland hardwood and swamp habitat that is lost through the construction of the WSLP.
- The MSP will help build land which will provide a critical line of defense against storm surge that will benefit the WSLP. This protection will reduce long term maintenance costs for the WSLP and help protect the levee system.
- The Louisiana Coastal Protection and Restoration Authority (CPRA) stated in its August 23, 2021 letter to Colonel Murphey that they acknowledge that Alternative 2 is costlier than the USACE’s Tentatively Selected Alternative (TSA) and “will agree to be responsible for that increased cost over and above that of the TSA”.

- Even with CPRA covering the excess cost of Alternative 2, this option would still free up precious restoration dollars so that CPRA can move forward on other shovel-ready, critical restoration projects across the coast.
- Utilizing the MSP will alleviate pressure on a shortage of mitigation credits from mitigation banks in the area.

Additionally, the restoration project will work with other nearby diversions to protect many communities in the region, including Baton Rouge. These projects will help maintain the Manchac Landbridge, a narrow strip of land between Lakes Pontchartrain and Maurepas. This will prevent the two lakes from merging, a situation that would be devastating and could send storm surge to communities from the River Parishes into the Greater Baton Rouge area.

The WSLP project presents a common-sense opportunity to reap multiple benefits by linking the levee project to the adjacent swamp restoration project. Choosing to use the MSP as mitigation for the WSLP is just the type of innovative solution we need to restore our coast and protect communities in the face of a dire land loss crisis.

Considering that the MSP would allow mitigation to occur directly adjacent the impacted area and the fact that CPRA is willing to take responsibility for excess costs, we believe that the River Reintroduction into Maurepas Swamp project is the preferred alternative for compensatory mitigation for the West Shore Lake Pontchartrain project.

Louisiana Wildlife Federation is a statewide, nonprofit organization that represents 18 affiliate organizations and more than 6,400 members dedicated to the conservation of Louisiana's wildlife and natural resources. Thank you for the opportunity to submit these comments for consideration.

Sincerely,



Rebecca Triche
Executive Director