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

PO Box 65239, Baton Rouge, LA 70896
8480 Bluebonnet Blvd. Suite F, Baton Rouge, LA 70810
(225) 344-6707
www.lawildlifefed.org

September 2, 2024

Col. Cullen A. Jones, PMP
Commander and District Engineer New Orleans District

Prepared by Mark Lahare, Environmental Protection Specialist
Emailed mvnenvironmental@usace.army.mil
U.S. Army Corps of Engineers, Regional Planning and Environment Division, South
New Orleans Environmental Branch, CEMVN PDS-R
7400 Leake Avenue New Orleans, LA 70118

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

Dear Col. Jones,

Thank you for 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 disappearing from a combination of hurricanes, sea level rise, repercussions of flood control and navigation activities, and natural processes. As we noted in our 2022 comments, the single largest action that can be taken to help mitigate some of this loss is to allow the Mississippi River to do what it has 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 is occurring in Wax Lake Delta and Mardi Gras Pass.

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 and it underscores the importance of reconnecting our river to the surrounding estuary.

Although the current proposal is being pursued under a purely navigation authority, we commend the U.S. Army Corps of Engineer for finding innovative solutions that will both aid navigational safety and continue the work the river is doing to build land and habitat in the outflow area of Quarantine Bay. These improvements from the 2022 proposal include continuing the connection of the river to wetland areas to the east, the introduction of Sediment Retention Enhancement Devices (SREDs), and pushing back the allowed flow to the 2019 instead of 2016 levels. These changes from the 2022 proposal are all enormous improvements for the benefit of wildlife and fisheries in the area.

Thank you for bringing forward this innovative approach to Neptune Pass management that better addresses navigation concerns, the pass structure stability, as well as coastal advocate concerns about closing off this connection between the river and wetlands to the east of the river.

While we applaud the Corps' new design and responsiveness to previously stated concerns about a complete closure of the pass, the environmental assessment (EA) and FONSI raise a number of questions that are not currently included in the EA or FONSI, although they may have been a part of decision-making:

- The placement of the SREDs and construction of the structure at the river's edge will change the current landscape with channel evolution and sediment accumulation. How will the structure and SREDs be managed into the future to continue successful operation?
- What impact will the current design of the structure and SREDs have on the outfall area and what impact will that have on the system's operation and longevity?
- Is there an opportunity in the future to work with the Corps around the location and structure of the SREDs?
- What is the modeling, science, and decision-making processes that demonstrate the SREDs need to include 250,000 tons of armor stone, 50,000 tons of core and bedding stone, and 100,000 square yards of geotextile?
- With the fixed location armoring of the SREDs, how does that fit into long-term adaptive management of the closure and outfall area as sediment accumulates?
- With a goal of limiting flow to 80,000 cfs, it appears from supporting documentation that can be accomplished with SREDs alone, what additional benefit does the sill provide?

This innovative approach is the perfect opportunity for the Corps to engage local stakeholders and researchers in the design and placement of SREDs as this project design process moves forward.

Louisiana Wildlife Federation is a statewide conservation organization representing more than 11,000 members and 23 affiliate organizations supported by hunters, anglers, hikers, paddlers, birders, campers, and other outdoor enthusiasts.

Thank you for the opportunity to comment on this important milestone.

Sincerely,
Rebecca Triche

Executive Director
Louisiana Wildlife Federation