APPENDIX C
NOAA FISHERIES SERVICE COORDINATION LETTER

Volume VI
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NOAA Fisheries Service Coordination Letter

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701

February 17, 2009 F/SER46/RH:jk
225/389-0508

Mr. Kip R. Runyon
CEMVS-PM-EA
Robert A. Young Building
1222 Spruce Street
St. Louis, Missouri 63103-2818

Dear Mr. Runyon:

NOAA's National Marine Fisheries Service (NMFS) has received the public notice advertising a scoping meeting to be held for the Louisiana Coastal Area (LCA), Louisiana; Convey Atchafalaya River Water to Northern Terrebonne Marshes Feasibility Study. According to the public notice, the U.S. Army Corps of Engineers (COE) intends to undertake a feasibility study and prepare a supplemental environmental impact statement (SEIS) to evaluate alternatives to increasing Atchafalaya River influence to central and eastern Terrebonne marshes via the Gulf Intracoastal Waterway. This SEIS will be tiered off a programmatic EIS completed for the Louisiana Coastal Area Ecosystem Restoration Study completed in November 2004. The COE has requested the public and natural resource agencies provide recommendations on: 1) the environmental problems and needs that should be addressed in the document; 2) the important resources in the project area; and, 3) reasonable restoration alternatives to be considered in the feasibility study and SEIS.

Aquatic and tidally influenced wetland habitats in portions of the study area are designated as essential fish habitat (EFH) for postlarval and juvenile life stages of brown shrimp and white shrimp, red drum, and gulf stone crab. Fishery management plans for these species have been developed by the Gulf of Mexico Fishery Management Council (GMFMC). Detailed information on federally-managed fisheries and their EFH is provided in the 2005 generic amendment of the FMPs for the Gulf of Mexico prepared by the GMFMC. The generic amendment was prepared as required by the Magnuson-Stevens Fishery Conservation and Management Act.

In addition to being designated as EFH for the brown shrimp, white shrimp, red drum and gulf stone crab, water bodies and wetlands in the study area provide nursery and foraging habitats supportive of a variety of economically important marine fishery species, such as striped mullet, Atlantic croaker, gulf menhaden, spotted seatrout, sand seatrout, southern flounder, black drum, and blue crab. Some of these species also serve as prey for other fish species managed under the Magnuson-Stevens Fishery Conservation and Management Act by the GMFMC (e.g., mackerels, snappers, and groupers) and highly migratory species managed by NMFS (e.g., billfishes and sharks). NMFS recommends the SEIS include separate sections titled "Essential Fish Habitat" and "Marine Fishery Resources" that identify the EFH and fisheries resources of the study area and describe the potential impacts and benefits to those resources that could be caused by various activities to be described and evaluated in the document. Potential direct adverse impacts of project implementation could result from the dredging of channels through wetlands to help direct water flows to the targeted areas or the construction of impediments to marine fishery movements to force water moving toward one area into a more desired course. Potential direct beneficial impacts could result from the restoration or maintenance of more productive categories of EFH (i.e., marsh, marsh edge, and submerged aquatic vegetation).

There are two distinctly different target areas within the study area comprised of the Penchant basin or mapping unit marshes and those located in the Boudreaux and Terrebonne marsh mapping units. Penchant basin marshes consist primarily of fresh marsh with large expanses of different classes of floating marsh. It has long been a concern that marshes in the Penchant basin may be receiving too much water in portions of the basin where water movement is not relatively stagnant. The cumulative impacts section of the SEIS should consider how increasing Atchafalaya River discharge to this area through the Avoca Island levee and into the Bayou Chene/Gulf Intracoastal Waterway would impact project areas marshes and other ongoing restoration efforts such as the Penchant Basin Natural Resources Plan (TE-34). Additionally, there is documented concern that floating marshes comprised of maiden cane can be affected by high Atrazine levels contained in diverted river waters and that their soils may have increased sulfur and organic matter decomposition as a result of Atchafalaya River discharge. The greater decomposition of the root make can make these floating fresh marshes more susceptible to erosion during high energy events caused by hurricanes[1]. The SEIS should identify these potential issues and discuss their potential cumulative and chronic impacts on wetland health and loss.

Central Terrebonne basin in the vicinity of Lake Boudreaux, and the eastern Terrebonne basin near Grand Bayou would be the focus of increase freshwater introduction as well. Wetlands in these Terrebonne marsh areas are rapidly subsiding and eroding, and NMFS believes that the proposed influx of increased levels of nutrients and sediments to these areas may be an important component to an overall restoration plan. However, NMFS is concerned that actions to be proposed and evaluated in the SEIS could lead the public to believe that wetland loss in the project area could be addressed fully. Considering the high wetland loss rates in the target areas, NMFS believes it is unlikely that increased flows of Atchafalaya River waters into those areas would result in restoration of those habitats, or even completely halt those losses. NMFS recommends the SEIS fully discuss the likely extent of project benefits to target area wetlands to allow a determination of what other actions may be necessary to help restore these important habitats. Furthermore, the COE should explore in the SEIS potential risks to changing wetland soils from river water introduction and potential susceptibility to synoptic losses.

In evaluating alternatives to the proposed project, NMFS recommends the COE include dedicated dredging to restore wetland elevations be considered as an alternative. The deposition of dredged material to rapidly restore marsh habitats to wetland elevations has already been undertaken in the study area under the auspices of the Coastal Wetlands Planning, Protection and Restoration Act. The West Lake Boudreaux Shoreline Protection and Marsh Creation project (TE-46) completed in 2007 used sediment dredged from Lake Boudreaux to create more than 250 acres of marsh elevations in shallow water in one area targeted for increased fresh water inflows. The SEIS should evaluate the amount of time necessary for the project benefits to accrue and result in measurable benefits, and consider alternatives that would result in more timely restoration of habitats in the targeted areas.

The EFH and marine fishery resources sections of the document also should describe and quantify the potential impacts and benefits of the proposed construction activities on EFH categories (e.g., emergent wetlands, bottom substrate, submerged aquatic vegetation, and estuarine water column). The SEIS should evaluate alternatives to any activities that would result in an adverse impact to those resources to determine if there are less damaging methods to achieve the same result. The overall net benefits of the project on wetland habitats supportive of marine fishery resources should not preclude efforts to avoid or minimize negative impacts of some design features on those resources.

We appreciate the opportunity to identify resources that should be evaluated in the SEIS, and to recommend alternatives and issues to be addressed. If you have any questions regarding comments and

[1] Swarzenski, C.M., T.W. Doyle, B. Fry, and T. G. Hargis. 2008. Biogeochemical response of organic-rich freshwater marshes in the Louisiana delta plain to chronic river water influx. Biogeochemistry. Vol. 90, pages 49-63.

recommendations provided herein, please contact Mr. Richard Hartman of our Louisiana Habitat Conservation Division office at (225) 389-0508, ext 203.

Sincerely,

for Miles M. Croom
Assistant Regional Administrator
Habitat Conservation Division

c:
FWS, Lafayette
EPA, Dallas
LA DNR, Consistency
F/SER46, Swafford
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