LAKE PONTCHARTRAIN BASIN FOUNDATION
SAVE OUR COAST SAVE OUR LAKE

LPBF Summary of Joint Comments sent to the U. S. Army Corps of Engineers for the MRGO Ecosystem Restoration Feasibility Study

The MRGO shipping channel contributed to decades of wetland loss and to the catastrophic flooding during Hurricane Katrina. The public comment period for the Army Corps of Engineers' Mississippi River Gulf Outlet (MRGO) Ecosystem Restoration Plan Draft Feasibility Report ended on March 5, 2011.

LPBF partnered with local and national organizations, leading scientists and large landowners in St. Bernard Parish and submitted detailed recommendations to the Corps for review and incorporation into its final plan to restore massive damage caused by the obsolete, Federal navigation channel. The recommendations were based primarily on LPBF's long-term planning such as our Comprehensive Habitat Management Plan and two prior MRGO reports released jointly with the MRGO Must Go Coalition. Complete comments and recommendations are available at www.saveourlake.org/our-coast.php. (Click here for a pdf version.)

Our major recommendations for modifications to the Corps' MRGO draft plan:

1. Maximize sustainability, functionality, and cost efficiency in restoration by allowing a shift in acreage accounting. The Corps' overly strict planning methodology of exact acre per acre replacement for each habitat is a good measure of the overall costs and gross needs of restoration, but in detailed planning leads to less than optimum ecologic restoration.
2. The Biloxi Marsh is a "Critical Landscape Feature" and as such the Biloxi Marsh land bridges should be included in the plan. Also, more significant restoration of the Bayou la Loutre ridge is needed.
3. Use the Violet Canal corridor for the new Violet Diversion.
4. Restore regional oyster barrier reefs along the east and north sides of the Biloxi Marsh.
5. Develop a baseline and then a comprehensive ecologic plan for the Central Wetlands. The complement of marsh or swamp creation should be designed around the future restored hydrologic conditions and not the pre-1956 conditions. The baseline should be based on further monitoring to determine the current status of the Central Wetlands.
6. Include a new channel constriction and additional bank restoration of the MRGO channel to reduce the risk of wave re-generation during a hurricane.
7. Due to concerns with dredging extensive borrow holes in Lake Borgne, consider alternative fill material sources, such as the Mississippi River and Breton Sound.
8. Immediately implement a more robust monitoring effort that adapts as project elements are constructed.

9. Since considerable amounts of fuel will be required to dredge and transport fill material, consider use of natural gas as a cheaper and more environmentally acceptable alternative fuel.
10. The Corps of Engineers and the State of Louisiana should set up and fully support a Science Liaison Team that can participate in field work and provide advice. In light of the complexity of this project, the range of revisions that we are seeking, and the interest of many in the scientific community in the design and implementation of this project, this independent team would serve as a critical resource in the planning process.
11. In an effort to support full transparency and a robust planning process, make all public comments received by the comment deadline publicly available online as soon as is technically feasible.
12. Resolve the cost share dispute between the Corps of Engineers and the State of Louisiana.

The Corps' draft plan marks a long-awaited step toward protecting communities along the MRGO and moving forward on crucial restoration projects for Orleans and St. Bernard Parishes. We look to the Corps to consider and incorporate our recommendations, which strengthen the draft plan considerably by offering implementable suggestions that will achieve better protection for our communities and a sustainable, healthy ecosystem.

Our comments and recommendations are available in their entirety on our website at www.saveourlake.org/our-coast.php. (Click here for a pdf version.)