

CCMP COMMENTS

BTNEP MC and Public Comments



Image: BTNEP, Richard DeMay

Overview

Following the completion of the draft 2018 BTNEP CCMP Revision, BTNEP sought insight from BTNEP MC members and various stakeholders through the comment period that concluded on May 23, 2018.

Over the course of the public comment period, BTNEP received BTNEP MC member and public comments from stakeholders.

The comments were extremely constructive and provided the writing team with ideas to make the document more accurate and user friendly.

All of the submissions were aggregated and reviewed by the BTNEP team and were considered the creation of the final 2018 BTNEP CCMP. The following attachment is a compilation of all submissions.

BTNEP MC Members Comments

	Author	Comment	In Response To	Submitted On	Response
	Scott Wilson	Page 2, paragraph 5, Line 2, "consensus driven" should be "consensus-driven" or you need to reverse that situation in the text of Chapter 1	Private: Foreword	2/12/2018 15:44	Changed
	Scott Wilson	Page 5, first sentence under "Goals" Heading, change "to" to "that"	Private: Chapter 1: Understanding BTNEP	2/12/2018 15:52	Changed
	Scott Wilson	Page 6, first paragraph after "BTNEP Priority Issues", line 7, "affect" should be "affects"	Private: Chapter 1: Understanding BTNEP	2/12/2018 15:59	Changed
	Joni Tuck	What's up with the logo?? it looks like it cuts off on the right side.	Private: Front and Back Cover	2/13/2018 1:30	Changed
	Joni Tuck	back cover - suggest adding the web address and social media profile details under a heading "Follow Us" - it's only going to become more prevalent as a method of interacting with the Program and keeping track of implementation of the CCMP as time goes by.	Private: Front and Back Cover	2/13/2018 1:32	Stet
	Mart Black	P.9, Paragraph 6 (give or take); re: STATUS: Update: The Cultural Resources Assessment has been completed and all actions related to design have been cleared. Design phase is scheduled to be completed at the end of 2019.	Private: Chapter 5 Category 2: Ecological Management	2/14/2018 19:48	Changed
	Mart Black	Page 34; Paragraph 2; line 5: "if constructed" should read "when constructed to its full 18 ft. height." Page 34; Paragraph 2; lines 13 and 14: There is an inconsistency between the number of levee miles here that TLCD is responsible for (c. 75) and the number of flap or sluice gates (90) at 24 locations. On page 38, the text has TLCD responsible for 70 miles of levee and 9 locations with flap or sluice gates. These discrepancies need to be reconciled.	Private: Chapter 5 Category 2: Ecological Management	2/14/2018 19:57	Changed
	Mart Black	Page 38; Last Paragraph: The text needs to be reconciled with similar text on p. 34 regarding the miles of levees and flap/sluice gate locations that TLCD is responsible for.	Private: Chapter 5 Category 2: Ecological Management	2/14/2018 19:59	
	Mart Black	Page 39; First paragraph; line 3: Pointe-aux-Chenes should be Pointe Aux Chenes.	Private: Chapter 5 Category 2: Ecological Management	2/14/2018 20:01	Stet

BTNEP MC Members Comments

	Mart Black	Page 73; Last Paragraph; line 3 and 4: Pointe au Chien should be Pointe Aux Chenes. In line 4 Pointe aux Chenes should be Pointe Aux Chenes. Page 73; Last Paragraph; line 9: Pointe au Chien should be Pointe Aux Chenes.	Private: Chapter 5 Category 2: Ecological Management	2/14/2018 20:09	Stet
	Chasity Cheramie	Page 64, Paragraph 3, Line 3 "LDHH" should be "LDH" Page 64, Paragraph 5, Lines 1 and 10 "LDHH" should be "LDH"	Private: Chapter 5 Category 2: Ecological Management	2/20/2018 19:52	Changed

	Bren Haase	-Page 39- USGS land loss statistic can be updated to 1932-2016, where Louisiana has lost total of 2,006 square miles of land area (Couvillion et al. 2017) https://www.usgs.gov/news/usgs-louisiana-srate-coastal-wetland-loss-continues-slow -Page 40- Ad	Private: Chapter 4: Maps	2/20/2018 20:23	Changed
	Chasity Cheramie	-Page 6, "LDHH" should be "LDH" and "Louisiana Department of Health and Hospitals" should be "Louisiana Department of Health" -Throughout the document, "LDHH" should be "LDH"	Private: Acronyms	2/20/2018 20:23	Changed
	Chasity Cheramie	Page 68, photo, "sampleing" should be "sampling"	Private: Chapter 5 Category 2: Ecological Management	2/20/2018 20:29	Changed
	Chasity Cheramie	Page 111, photo, "safte" should be "safe"	Private: Chapter 5 Category 2: Ecological Management	2/20/2018 20:36	Changed
	Chasity Cheramie	Page 64, Paragraph 5, last sentence states that "The following agencies post advisories for high enterococci bacteria levels along coastal beaches." but I don't think that all of the agencies listed after that participate in the beach sign postings?	Private: Chapter 5 Category 2: Ecological Management	2/20/2018 21:01	Changed

BTNEP MC Members Comments

	Bren Haase	<p>P9 - TE-66, Status: Engineering and Design.</p> <p>P9: Houma Navigation Canal Lock Complex estimated cost is \$357.8 million, This may be correct and based on feasibility level estimates. (MP says ~\$366 million)</p> <p>P 12: "In contrast, the CPRA's 2017 Coastal Master Plan includes proposed controlled diversions of 20,000 cfs, 25,000 cfs, 30,000 cfs, 35,000 cfs, 50,000 cfs, and 75,000 cfs." also includes 2,000 cfs, 5,000 cfs,</p> <p>P:12 "Models also have not taken into account the influence of wind, which is a major driver of water levels in the estuary". Wind is accounted for in our ICM modeling.</p> <p>P14, 2nd paragraph: incomplete sentence "Consensus on the question of who is responsible for induced dredging costs Shipping"</p> <p>Page 26: "The State of Louisiana CPRA will be implementing its 2017 Coastal Master Plan over the next 50 years which will create marsh projects via the beneficial use of dredged material." 50 years not 20.</p> <p>Page 28: Missing part of a sentence "The USACE dredges navigation channels in the BTES, and where bar channels and the lower reaches of the channels are dredged in the vicinity of barrier islands, the dredged material is often used for beach nourishment or marsh creation on the bay side of Currently, approximately 38 percent of"</p> <p>Page 29: "Over the next 20 years, the State of Louisiana CPRA will be implementing its 2017 Coastal Master Plan, which includes implementing several barrier island restoration projects on an as needed basis." 50 years not 20.</p> <p>P.37 recommended update: "The 2017 Coastal Master Plan as the plan recommends 32 nonstructural project areas, which include approximately 26,000 structures for mitigation at a cost of \$6 billion. This total includes approximately 1,400 non-residential floodproofings, 22,000 residential elevations, and 2,400 residential voluntary acquisitions. The 32 recommended nonstructural projects vary in project area size, number and cost of mitigation measures, and other details"</p>	Private: Chapter 5 Category 2: Ecological Management	2/20/2018 21:38	Changed
	Bren Haase	P.6: should CPR be CPRA?	Private: Chapter 7: Monitoring Plans Technical Summary	2/20/2018 21:44	Changed

**BTNEP MC Members
Comments**

	Bren Haase	P. 33 - "Estimated costs for shoreline protection in the 2017 Coastal Master Plan is 200 billion or more." 200 Million? We only identify around \$800M coastwide in the MP.	Private: Chapter 5 Category 2: Ecological Management	2/20/2018 22:06	Changed
	Bren Haase	<p>Page 12, Right Column: There are a number of misstatements regarding the modeling that has been done on diversions. Please consider the language below. If you have questions please contact us.</p> <p>In recent years, numerical modeling from various studies looking at predicted increases in water levels caused by a range of different diversion capacities and operations have shown varying results. Some models indicate that the increase in flood risk to nearby communities should be minimal with a moderately-sized diversion. Other models show significant increases in water levels that could increase flood risk in populated areas without mitigation. Recent modeling efforts have started to examine the cumulative influence of multiple proposed diversions operating simultaneously, taking into account tides and wind, which is a major driver of water levels in the estuary.</p>	Private: Chapter 5 Category 2: Ecological Management	2/21/2018 16:10	Changed
	Susan Hennington	I have reviewed EM-4 and all of my previous edits have been adopted in this current version, therefore I submit no changes; however, my supervisor Brad Inman, may want to submit an edit(s) during his review of this section (EM-4). Thank you for this opportunity to comment. Susan Hennington, 22Feb2018	Private: Chapter 5 Category 2: Ecological Management	2/22/2018 16:16	Stet

BTNEP MC Members Comments

	Nicole Boudreaux	<p>Page 3, Paragraph 1, Line 2, remove "a" before "public stewardship" and before "strong"</p> <p>Page 3, Paragraph 1, Line 3, is there an extra space before "providing"?</p> <p>Page 4, Column 2, Line 1, add a period "." after Chesapeake Bay</p> <p>Throughout the section: Be consistent with punctuation at the end of bullets. Some have periods. Some don't.</p> <p>Page 6, 1st full paragraph, Remove ".00" after \$250,000 and \$500,000</p> <p>Page 6, SR-2, 3rd Objective, add "and receiving feedback" after "information" (To provide a public forum for disseminating current information and receiving feedback about issues facing the BTES)</p> <p>Page 7, Paragraph 3, Line 2, move "the" before "BTNEP MC" (...should mutually agree on "the" BTNEP MC meeting location)</p> <p>Page 8, Column 2, SR-3, Paragraph 1, put a period "." after BTNEP.</p> <p>Page 9, Paragraph 1, Line 3, add a comma "," after "science-based"</p> <p>Page 9, Photo Cutline, add "A" at the beginning of the sentence and add "the" before "value" (photo cutlines should be complete sentences)</p> <p>Page 10, Column 2, Paragraph 2, Line 2, Remove ".00" from \$50,000 and \$100,000</p> <p>Page 10, Photo Cutline, answer the questions "where" and "why" if possible.</p> <p>Page 13, First bullet under "Timelines and Milestones," last line, add "the" before database</p> <p>Page 13, 2nd column, 1st paragraph under "Possible Range of Costs and Sources of Funding", remove ".00" on \$75,000 and \$500,000</p> <p>*Note: This is where my action plans end, but I have one other comment. Be consistent with presentation of money ranges. In the rest of this section done by the education committee, money ranges are presented like this: \$300,000 - \$500,000. In our part of the section, we present them as \$300,000 to \$500,000. Pick one way and use that format throughout.</p> <p>It looks great! :)</p>	Private: Chapter 5 Category 3: Sustained Recognition and Citizen Involvement	2/23/2018 18:11	Changed
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**BTNEP MC Members
Comments**

	Susan Hennington	EM-4 Chapter, Page 24, Paragraph 6 (last paragraph on right half of page), Lines 32-35 (counting only actual lines of paragraphs), please delete in entirely the following two sentences: CWPPRA is currently authorized through 2019. It is anticipated that the program will be reauthorized for an additional 10 to 20 years. Thank you for this opportunity to comment (today's date is 23Feb2018). Susan Hennington	Private: Chapter 5 Category 2: Ecological Management	2/23/2018 19:17	Changed
	Susan Hennington	<p>EM-5 Chapter, starting at Page 28, Paragraph 10 (right half of page at bottom), starting at Line 70 (counting only actual paragraph lines) (looking at the 1st sentence under USACE, New Orleans District): The first sentence is incomplete. It currently reads as follows: "The USACE dredges navigation channels in the BTES, and where bar channels and the lower reaches of the channels are dredged in the vicinity of barrier islands, the dredged material is often used for beach nourishment or marsh creation on the bay side of ". I'm guessing that "barrier island" was ,meant to finish that sentence. I recommend the EM-5 team double check this statement. And then the next statement says "Currently, approximately 38 percent of the suitable /available material dredged under the O&M program is used beneficially." I recommend that 38 percent be changed to 42 percent (I have a similar statement in the EM-4 section that was updated for this CCMP revision effort).</p> <p>EM-5 Chapter, Page 30, Paragraph 2, Lines 12-15:Please delete the following two sentences in entirely: "CWPPRA is currently authorized through 2017. It is anticipated that the program will be reauthorized for an additional 10 to 20 years."</p> <p>Thank you for these opportunities to comment. Susan Hennington, New Orleans District Corps of Engineers, 23 Feb 2018</p>	Private: Chapter 5 Category 2: Ecological Management	2/23/2018 19:56	Changed

**BTNEP MC Members
Comments**

	Bren Haase	<p>General comments on Section EM-2:</p> <p>1) It may be captured elsewhere, but some discussion of the impacts of not including diversions in the BTES would be helpful to set the context. That is, comparing potential impacts to a future with diversions in place to current day conditions is not realistic. We know the BTES of tomorrow will be very different than that of today with or without diversions in place.</p> <p>2) I think the potential negative impacts of diversions might have on the BTES are fairly represented but there doesn't seem to be a commensurate representation of the potential positive impacts. For example, in discussing negative impacts to Commercial Fisheries, you provide the example of "lethally low salinities for oysters beds close to the project" but don't provide the example of improved beds further down basin as a potential positive impact. Also, it is likely that resources like waterfowl, alligators, and freshwater fish like largemouth bass will fare well "close to the project" but this is not mentioned.</p> <p>3) In the "Impacts to Other Living Resources" section potential impacts to marine mammals are discussed. The recently passed Bipartisan Budget Act of 2018 includes a general provision (Sec. 20201) that the Secretary of Commerce issue a waiver pursuant to certain sections of the MMPA for the Mid Barataria and Mid Breton Diversions and the Calcasieu Salinity Control Projects. This may affect the statements made in this section.</p> <p>4) In the "Description" section it is mentioned that Davis Pond "is currently one of the largest controlled diversions ever constructed." While true when considering controlled diversions built only for ecosystem benefits, it's important to note that much larger controlled diversions have been built and operated (some in the BTES) including the Old River Control Complex, Morganza Spillway, an Bonnet Carre Spillway and we can learn from our experiences with them.</p>	Private: Chapter 5 Category 2: Ecological Management	2/23/2018 20:29	
	Brad Inman	<p>Page 25, Paragraph 8, Note there are several sections where this paragraph is duplicated. If each section is considered separately, then the duplicate is fine, it just depends on the intent.</p>	Private: Chapter 5 Category 2: Ecological Management	2/23/2018 23:22	

**BTNEP MC Members
Comments**

	Brad Inman	<p>Page 26, Paragraph 5, Line 5 - Any area in the CCMP that has a sunset year for CWPPRA as well as anticipated reauthorization needs to be deleted. Please delete "CWPPRA is currently authorized through 2019. It is anticipated that the program will be reauthorized for an additional 10 to 20 years."</p> <p>Page 38, Paragraph 3, - Please delete entire paragraph "The 2007 WRDA.....or subsidence."</p> <p>Page 39, paragraph 6, -the numbers need to be updated. I will need to provide an update on Monday once info is retrieved.</p>	Private: Chapter 5 Category 2: Ecological Management	2/24/2018 0:06	Changed
	Brad Inman	Page 39, paragraph 6, Replace first sentence with "The Morganza to the Gulf of Mexico Hurricane Protection Project was reauthorized for construction of the 1% Annual Exceedance Probability plan in WRRDA 2014 at a cost of \$10.3 billion. "	Private: Chapter 5 Category 2: Ecological Management	2/26/2018 14:25	Changed
	Martha Cazaubon	<p>Page No. 5, first list, first paragraph, line 2 and others throughout document. Explanation: I am not sure what the proper way is to present a list like this but noticed different methods throughout the parts of the document I read.</p> <p>Page 10, par. 2, line 2, -- should the word "winds" be singular?</p> <p>Page 14, par. 4, line 1 - effects vs. affects.</p> <p>Pg. 15, par. 4 line 1 - community sewerage plants or community sewage treatment plants.</p> <p>Pg 17 third line, same as above.</p>	Private: Chapter 1: Understanding BTNEP	2/26/2018 15:40	Changed
	Martha Cazaubon	<p>Pg. 25, Urban/City/Rural Areas Par. 2, Harvey, Belle Chasse and Raceland are not cities. They are census designated places, but not municipal governments.</p> <p>Pg. 26, par. 3 line 9, "ways" of life or "way" of life, not sure which.</p>	Private: Chapter 2: Habitats of BTES	2/26/2018 15:44	Changed
	Martha Cazaubon	Pg. 36, 3rd to last line on right column, "...used in the field..."??	Private: Chapter 3: Value of the BTNEP Management Conference	2/26/2018 15:45	Changed

**BTNEP MC Members
Comments**

	Martha Cazaubon	Pg. 42 Map, is it possible to darken the parish boundaries any? It's hard to see.	Private: Chapter 4: Maps	2/26/2018 15:46	Changed
	Martha Cazaubon	<p>Pg. 50 Background/Major Issues, par. 2 line 2 and par. 3 line 7, "for the developing" take out the.</p> <p>Pg. 51 first bullet at left top "role in the developing" same thing.</p> <p>Pg. 54 CP-1 Objectives first bullet and also onto next page -- should there be periods at the end of each bullet? Sometimes there are and sometimes not elsewhere in the document.</p> <p>Pg. 56 Monitoring How Data is Shared, same as above but should report be capitalized? Not sure but noticed differences off and on through what I read. Pg. 59 and elsewhere, same comment on bullets there</p>	Private: Chapter 5 Category 1: Program Implementation and Coordinated Planning	2/26/2018 15:51	Changed
	Martha Cazaubon	<p>Pg. 3 foot note, Category 2?</p> <p>Pg. 12 Par. 1, line 7, first or third person? our or the?</p> <p>The picture on Pg. 12 is that Davis Pond? Should it be identified if it is since you refer to it in the narrative?</p> <p>Pg. 14 Par. 2, last line. "...dredging costs." Then Shipping title is part of next paragraph.</p> <p>Pg. 20 under Description Par 1 line 9 and Pg 21 Par. 3 line 5 - Donaldsonville is misspelled.</p> <p>Pg. 20 Description, Par. 1 line 7, should it be have or has -- "...the channel has been cleared..." because is the subject 16 miles? Not sure.</p> <p>Pg. 21 Par 1, line 8 should there be dollar signs on the amounts 41 to 70 million?</p> <p>Pg. 22 Performance Measures - Par. 1 line 6, "...and that because..." take out that?</p> <p>Pg. 25 Description, Par. 3, line 5, Lead Agency Par. 3 line 8 and Office of Coastal Management line 3 - should you write out cubic yards? Not sure</p> <p>Pg 26 Performance Measures 2nd bullet - same question.</p> <p>Pg. 27 Background/Major issues, Par 1 line 4, "... BTES have lost approximately? or around? 1.6 billion what? million cubic yards? Not sure</p> <p>Pg. 29 under USACE, New Orleans District line 6. "...bay side of Currently, approximately..." I think something is missing.</p>	Private: Chapter 5 Category 2: Ecological Management	2/26/2018 16:03	Changed

**BTNEP MC Members
Comments**

	Martha Cazaubon	<p>Pg. 3 foot note, Category 2?</p> <p>Pg. 12 Par. 1, line 7, first or third person? our or the?</p> <p>Pg. 12 is that Davis Pond? Should it be identified if it is since you refer to it in the narrative?</p> <p>Pg. 14 Par. 2, last line. "...dredging costs." Then Shipping title is part of next paragraph.</p> <p>Pg. 20 under Description Par 1 line 9 and Pg 21 Par. 3 line 5 - Donaldsonville is misspelled.</p> <p>Pg. 20 Description, Par. 1 line 7, should it be have or has -- "...the channel has been cleared..." because is the subject 16 miles? Not sure.</p> <p>Pg. 21 Par 1, line 8 should there be dollar signs on the amounts 41 to 70 million?</p> <p>Pg. 22 Performance Measures - Par. 1 line 6, "...and that because..." take out that?</p> <p>Pg. 25 Description, Par. 3, line 5, Lead Agency Par. 3 line 8 and Office of Coastal Management line 3 - should you write out cubic yards? Not sure</p> <p>Pg 26 Performance Measures 2nd bullet - same question.</p> <p>Pg. 27 Background/Major issues, Par 1 line 4, "... BTES have lost approximately? or around? 1.6 billion what? million cubic yards? Not sure</p> <p>Pg. 29 under USACE, New Orleans District line 6. "...bay side of Currently, approximately..." I think something is missing.</p>	Private: Chapter 5 Category 2: Ecological Management	2/26/2018 16:04	Changed
	Bren Haase (cont'd)	<p>Page 38 under "CPRA. State of Louisiana": The numbers here appear to be based on the draft plan. Should read: "The 2017 Coastal Master Plan recommends 124 projects that build or maintain more than 800 square miles of land and reduce expected damage by \$8.3 billion annually by year 50 or by more than \$150 billion over the next 50 years. It includes 79 restoration projects, 13 structural risk reduction projects, and 32 nonstructural risk reduction projects that will be implemented throughout coastal Louisiana."</p> <p>Page 38: under "CPRA. State of Louisiana": "or residential structure acquisition." Please use the word "voluntary" when talking about structure acquisition.</p> <p>Page 96: References Draft MP, rather than final. Recommend update "A principal function of CPRA is to develop and revise the Coastal Master Plan every five years. Reports have been published in 2007, 2012, and most recently in 2017. This document is the State's blueprint for coastal restoration and protection activities and has potential significant influence on living resources. This document is based on the best available science and research, as well as public and agency inputs."</p>	Private: Chapter 5 Category 2: Ecological Management	2/20/2018 21:38	Changed

Stet is an obelism, used by proofreaders and editors to instruct the typesetter or writer to disregard a change the **editor** or proofreader had previously marked.

Comments from CCMP Public Review Period

ID	Author	Organization	Comment	In Response To	Submitted On	Response
82	Delaina LeBlanc	BaratariaTerrebonne National Estuary Program	Photo credit is incorrect on page 253. Image: BTNEP	Chapter 7: Monitoring Plans Technical Summary	4/19/2018 14:23	Changed
83	Delaina LeBlanc	BaratariaTerrebonne National Estuary Program	Photo credit is incorrect on page 273. Image: Erik I. Johnson	Chapter 7: Monitoring Plans Technical Summary	4/19/2018 14:25	Changed
84	Delaina LeBlanc	BaratariaTerrebonne National Estuary Program	Page 271 photo credit should read, Image: Erik I. Johnson	Chapter 7: Monitoring Plans Technical Summary	4/19/2018 18:32	Changed
85	Susan TestroetBergeron	BaratariaTerrebonne National Estuary Program	Page vii Group of names under Living Resources Change Kate Spear's affiliation to United States Geological Survey	Acknowledgments	4/23/2018 14:25	Changed

Comments from CCMP Public Review Period

86	Alisha Renfro	National Wildlife Federation	<p>Page 8; column 2; under Probably Causes of Hydrologic Modification; bullet 4 “Diversions of freshwater flows and sediment loads for navigation, flood control, or water supply purposes” •Suggest changing to “Constraints or management of freshwater flows” •This bullet is confusing as written. I think it is referring to river levees, dredging, and cutting off distributaries, but it is not clear.</p> <p>Page 9; column 1; paragraph 4; lines 1-3 Suggest adding citation of referenced study. This may refer to Jankowski et al. 2017. If that is the reference, then “were recorded by tide gauges” •is inaccurate and should read “were determined using surface elevation change and vertical accretion.” •</p> <p>Page 10; column 1; paragraph 1; lines 1-2 Suggest adding in a citation here</p> <p>Page 10; column 2; paragraph 1; lines 5-9 Should be updated to reflect more recently released study Couvillion et al. 2017</p>	Chapter 1: Understanding BTNEP	5/22/2018 14:52	Changed page 9 Stet on other comments
87	Alisha Renfro	National Wildlife Federation	<p>Page 27; column 1; Table Suggest adding a caption to table describing source of information. Should also check that Barataria Basin Land Loss and Terrebonne Basin Land Loss reflect more recent Couvillion et al. 2017.</p>	Chapter 2: Habitats of BTES	5/22/2018 14:53	stet

Comments from CCMP Public Review Period

88	Alisha Renfro	National Wildlife Federation	<p>Page 68-69; column 2; paragraphs 1-2 Suggest adding in acknowledgement of the Coastal Master Plan process here that form the basis of many of the project and projects types discussed under this category. The Master Plan is present throughout this Chapter/Category, but is not discussed in any detail in this Chapter (it is discussed in Chapter 8). Additionally, while BTNEP and other members of its Management Conference participated on the Master Plan Framework Development Team, that does not seem to be acknowledged anywhere in the CCMP.</p> <p>EM-1 Hydrologic Restoration and Management Page 71; 1st column, 4th paragraph; second bullet; lines 2-3 "In some cases, large culverts are installed under roads, levees, or other obstructions that have impounded wetlands." Suggested changing to: "other obstructions to reduce wetland impoundment." This would make it clearer that the culverts are a type of hydrologic restoration that would address the issue of marsh impoundment.</p>	Chapter 5 Category 2: Ecological Management	5/22/2018 22:22	<p>Changed page 71, Changed page 72, Changed page 78, Changed page 79, Changed page 82, changed page 84, Changed page 91, Changed page 107, Changed page 116, Changed page 120. Stet on remainder of comments+ G9</p>
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Comments from CCMP Public Review Period

89	Alisha Renfro	National Wildlife Federation	I'm not sure exactly where this should appear in this chapter, but somewhere it should be acknowledge that, since under Executive Order 16-09, state agencies, departments and offices must do all in their power to be consistent with Louisiana's Comprehensive Master Plan for a Sustainable Coast, and the activities of BTNEP, and projects undertaken pursuant to this CCMP, must be consistent to qualify for state financial support.	Chapter 1: Understanding BTNEP	5/23/2018 19:36	Stet
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Stet is an obelism, used by proofreaders and editors to instruct the typesetter or writer to disregard a change the **editor** or proofreader had previously marked. It is a form of the Latin verb sto, stare, steti, statum,



Coalition To Restore Coastal Louisiana

1110 River Road S., Suite 222 Baton Rouge, LA 70802 • 225.767.4181
3801 Canal Street, Suite 400, New Orleans, LA 70119 • 504.264.6812

May 15, 2018

Ms. Susan Testroet-Bergeron
Barataria-Terrebonne National Estuary Program
Nicholls State University
320 Audubon, N. Babington Hall, Room 105
Thibodaux, LA 70301

Re: Comments on the BTNEP Comprehensive Conservation and Management Plan

Dear Ms. Testroet-Bergeron,

The Coalition to Restore Coastal Louisiana (CRCL) appreciates the opportunity to comment on the BTNEP Comprehensive Conservation and Management Plan. We congratulate you and your team on an exceptional achievement in working in consultation with so many stakeholders to complete the plan.

We are generally pleased the plan which provides a comprehensive overview of the many challenges and opportunities around the Barataria-Terrebonne Estuary System (BTES).

General Comments

The plan considers a variety of action plans that directly address the priority problems of the estuary. However, there is an extensive discussion of potential challenges for only one project type: river reintroductions and sediment diversions. This is concerning given the overwhelming support for diversions from the scientific community and their central role in the State's Master Plan.

- We recommend a discussion of pros and cons of all contemplated actions.
- We recommend that the final plan very clearly state the plan's intended alignment with the State's Master Plan.
- The plan lacks citations for several important stated concerns, making it difficult to assess the scientific basis of these concerns.
- We recommend the addition of citations throughout the document.

Specific Comments

1. Contamination of sediment in the marshes – Contamination is listed as a priority problem in the estuary on page 6 and is then expanded upon in pages 14-18. However, citation is not given throughout any of chapter 1.

In the absence of significant contamination, the benefits of adding vetted and tested sediment to marshes through diversions or beneficial reuse of dredged material outweigh the costs in rebuilding our coast. We are concerned that the BTES will simply not survive without intervention through sediment diversions and/or the beneficial reuse of dredged material. Positing the contamination of sediment in marshes as a high priority issue of the estuary without expounding on the potential of added sediment through the system seems to us unbalanced.

2. Diversions as a cause of eutrophication -- We have similar concerns with listing Mississippi River diversions as a probable cause of eutrophication on page 14, especially without any scientific citation. Lumping diversions with malfunctioning sewage treatment plants and septic tanks is misleading, especially without listing the relative contributions each of these entities has towards eutrophication.
3. Canal Banks - The benefits of canal banks are listed without citation on Page 8, leaving the reader to wonder what diversity of habitat is provided or aquatic production potential is available.
4. Bottlenose dolphins – We are concerned with the statement that “causing harm to the health of the resident Barataria population of bottlenose dolphins would be a clear violation of the U.S. Marine Mammal Protection Act.” It is our understanding that the population of bottlenose dolphins in Barataria is not genetically distinct from the broader Gulf of Mexico population. As far as we are aware, there have been no scientific studies that have proven their genetic distinctness. Our position on this population is included in the attached white paper (Muth, 2016. This paper has not been updated to reflect continuing research since its development.). Additionally, it is important to note that the Mid-Barataria Sediment Diversion has also already received an exemption under the MMPA.
5. Page 90 - Statistics are provided stating that “up to 20 million yd³ could be used annually in Louisiana to enhance coastal wetlands through marsh creation, etc.” We recommend the addition of a citation for this figure.

We appreciate the opportunity to review this plan and provide comments.

CRCL appreciates the opportunity to participate in the work of BTNEP as a member of the Management Conference. While we have not been active in this role, we look forward to re-engaging this year. Our new Policy Director, Emily Vuxton, will be our representative for Management Conference meetings.

Sincerely,



Kimberly Davis Reyher
Executive Director