



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

May 28, 2009

F/SER46/RH;jk  
225/389-0508

Mr. Gib Owen  
Environmental Planning and Compliance Branch  
Planning, Programs, and Management Division  
New Orleans District, U.S. Army Corps of Engineers  
Post Office Box 60267  
New Orleans, Louisiana 70160-0267

Dear Mr. Owen:

NOAA's National Marine Fisheries Service (NMFS) has received the draft **Individual Environmental Report (IER) #8** transmitted by letter from Ms. Joan M. Exnicios dated May 8, 2009. The draft IER evaluates and quantifies the impacts associated with replacing the flood control structure and adjacent flood walls at Bayou Dupre in St. Bernard Parish, Louisiana.

Based on our review of the draft IER and prior coordination with staff of the New Orleans District on this project, the new structure in Bayou Dupre would have the same opening dimensions of the old structure. However, the new structure would be constructed within a cofferdam and water flow and marine fishery passage at that point would be limited to four 48-in culverts having 4-in to 5-in mesh screens to prevent blockage.

NMFS is concerned that the IER is inconsistent in the estimate of time the cofferdam would be in place. Page 11, paragraph 1 indicates the cofferdam would close the bayou for an 8 to 12 month time frame. However, in the discussion of impacts (page 29, paragraph 3), the document indicates the cofferdam could be in place for as long as two years. All portions of the IER that discuss the likely duration of cofferdam placement and closure of Bayou Dupre should accurately and consistently identify the likely duration of closure.

NMFS believes the document is fairly thorough in its analysis of potential project impacts on the hydrology of, and fishery access to, the area identified as the central wetlands. As summarized in the document, the placement of water control structures in area waterways evaluated in IER #11, as well as the construction of a closure on the Mississippi River-Gulf Outlet at Bayou LaLoutre, is expected to reduce tidal fluctuations in the central wetlands area from 19 inches to 8 inches. According to IER #8, the placement of the cofferdam in Bayou Dupre, which would likely reduce inflow by 90%, would reduce that tidal fluctuation further by several inches. Page 33, paragraph 1 indicates that lower elevation areas in the central wetlands that normally would be exposed on low tides likely would remain inundated as a cumulative result of the installation of numerous structures. Other portions of the document state that elevated water levels during construction are likely following the passage of storm events due to reduced drainage capacity. NMFS is concerned that project construction would result in elevated water levels in the central



wetlands, especially during construction, and that these higher than normal low tides would result in reduced plant health in the already degraded wetlands in the project area. NMFS disagrees with the statement provided at the end of paragraph 1 on page 33 that other better adapted species would spread into the lower elevation areas experiencing longer inundation periods. NMFS believes it is likely that such areas will convert to shallow open water. The document should include a discussion on the probable fate of lower elevation areas and identify the vegetative species that would likely colonize those areas, given the salinity range the area is likely to experience.

We appreciate the opportunity to review and comment on the draft IER.

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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