



UNITED FOR A HEALTHY GULF

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May 14, 2010

Col. Alvin Lee
United States Army
Corps of Engineers
New Orleans District
7400 Leake Avenue
New Orleans, LA 70118

RE: State of Louisiana proposal for Emergency Barrier Island Creation and Restoration for the Chandeleur Islands and also on all the barrier islands from East Grand Terre Island eastward to Sandy Point

Dear Col. Lee,

I am writing on behalf of the Gulf Restoration Network (GRN), a diverse coalition of individual citizens and local, regional, and national organizations committed to uniting and empowering people to protect and restore the resources of the Gulf of Mexico. We, like many of our colleagues who have been following the BP oil drilling disaster response closely, have recently heard about a proposal submitted to the U.S. Corps of Engineers (Corps) to “request emergency authorization to perform restoration work on the Chandeleur Island and also on all the barrier islands from East Grand Terre Island eastward to Sandy Point for purposes of enhancing the capability of the islands to reduce the inland movement of oil from the sediment via cutterhead pipeline dredge from adjacent water bottoms Gulf ward of those islands, and depositing the dredged material in protective berms along those islands.” While we share the State’s desire to protect our coast from the harmful effects of the ever-growing threat of oil fouling our wetlands, based on conversations with scientists, conservationists, as well as federal resource agencies, we do have some concerns and suggestions regarding this proposal:

I. Concerns

1. The timeline of this proposal

Given the small amount of information in the drawings associated with Louisiana’s request, as well as the complexity and diversity of existing barrier islands, it seems ill advised to move forward with such a massive project on such a short time frame.

Additionally, it seems that it would take quite a long time to build the sand barriers. Since oil is already being seen within the barrier islands, would these barriers effectively keep the oil out?

2. Limited amounts of sand and sediment

When it comes to coastal restoration, it has become exceedingly clear that one of the limiting factors is the amount of sediment available for restoration purposes. This must be taken into account when considering this sand barrier plan. Sand used for this project will not be available for other restoration projects, especially if it is fouled with oil. We are not saying a balance cannot be struck here, but limited sediment resources must be taken into consideration.

3. Impacts of oil on new barriers

We would like to see more information as to the efficacy of building and enhancing barrier islands if the intention is that they might become polluted with oil. How will these barriers be cleaned? Will the sand need to be removed and disposed of, thus reducing the amount of sediment we have for restoration?

4. Impacts to hydrology

Given the information in the drawings submitted to the Corps for their review, there does not appear to be any analysis of the effects the sand barriers might have on the hydrology inside the barrier islands. Some questions that need to be answered are: Will these barriers restrict the hydrology so water within the barriers will rise? Will the constricted passes between the barrier islands increase velocities such that flow will increase, potentially pulling oil towards the coast during certain tidal periods?

5. Impacts to fish and marine life

The State's proposal does not include any analysis as how the proposed barriers would impact fish, other marine life, water fowl, and other wildlife. An obvious goal of these barriers should be to protect wildlife. Given this, we feel that there must be a thorough analysis on what impacts these barriers might have on wildlife in our oceans, estuaries, and existing barrier islands.

6. Coverage under general permit

We understand that the BP oil drilling disaster is a disaster of unprecedented proportions. However, we are concerned that Louisiana is proposing to have such a large project covered under a general permit (NOD 20). General permits are intended to have negligible impacts individually and cumulatively, however this project will certainly have impacts that would normally require a full Environmental Impact

Statement (EIS) under the National Environmental Policy Act (NEPA). While we acknowledge that this disaster requires regulatory flexibility, general permits were never intended to address massive projects with potentially significant environmental impacts. We find the precedent set by this action disturbing.

II. Suggestions

As we have stated throughout this letter, we acknowledge the extraordinary circumstances under which the sand barrier proposal has been offered. Because we share Louisiana's desire to protect our coast from the, as of yet, uncontrolled oil leak, we offer the following suggestions if the Corps moves forward with a sand barrier plan.

1. Do a pilot study

We recently attended a meeting with EPA Administrator Lisa Jackson, where she stated that the EPA, NOAA, and other agencies were conducting a pilot study of direct injection of dispersants into the oil plume. Similarly, we suggest that instead of moving forward with the entire sand barrier plan, a strategic pilot study be done. This study could be placed in an area where oil coming ashore is eminent. This way the pilots could be studied for effectiveness, longevity, and feasibility before dozens of miles of sand are dredged and deposited along our coast and barrier islands. This pilot study could be studied and monitored over a short period of time to inform a decision whether or not move forward with the entire project.

2. Focus on repairing gaps in and restoring existing barrier islands

We understand that there are past and developing plans to repair Louisiana's existing barrier islands. Perhaps it would make more sense to, instead of moving forward with the whole sand barrier project, focus efforts on bolstering existing barrier islands with the tools we have acquired through CWPPRA and other projects.

We would like to be clear that we are very concerned about the impacts of the BP oil drilling disaster and understand that the State needs to be doing what we can to reduce the impacts. However, moving forward with such a massive and expensive effort that may, in the end, prove ineffective and possibly inflict harm on existing natural resources may not be the best approach. If this project does proceed, the State must first ensure that BP will bear both the full cost of construction and responsibility for any detrimental impacts these barriers might have on our fisheries, coast, and wetlands. Additionally, it must be acknowledged by both the State and BP that these sand barriers are a short term response to the oil *response* not remediation/restoration for the impacts the oil will have on the Gulf Coast.

Thank you for reviewing our concerns and suggestion. I would be happy to explore these ideas further if you have any questions.

For a healthy Gulf,

Matt Rota
Water Resources Program Director

CC: President Barack Obama
Thad Allen, U.S. Coast Guard
Mike Boots, CEQ
Garret Graves, State of Louisiana
Lisa Jackson, EPA
Al Armendariz, EPA
Lawrence Starfield, EPA Region 6
Jane Lubchenco, NOAA
Pete Serio, USACE New Orleans District