

Friends of the Atchafalaya

August 22, 2014



P.O. Box 82508
Baton Rouge, LA 70884-2508

<http://www.atchafalaya.info>
<http://www.basinbuddies.org>

Phone: 225-366-2974

To the Mississippi River Commission:

The Board of Directors of Friends of the Atchafalaya respectfully submit these observations on the environmental conditions of the Atchafalaya Basin Floodway System, LA Project.

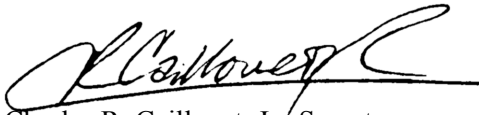
We continue to be appreciative of the flood control capability of the Floodway System but are painfully aware of continual degradation in the health of the forested swamps and the remaining open-water areas inside and outside the levees.

We believe that it is possible to maintain the flood control capability and still improve the health of the wildlife and fish habitat and recreational resources inside the Floodway, thereby supporting the commerce that depends on a healthy ecosystem.

We also believe that healthy wild areas serve important functions in providing the clean air and water necessary for human health.

We hope that the Commission will see fit to include some of these concerns in its report to the Secretary of the Army and through him, to the U. S. Congress.

For the Friends of the Atchafalaya Board of Directors,



Charles R. Caillouet, Jr., Secretary
Friends of the Atchafalaya
39124 Camp Drive
Prairieville, LA 70769

Attachment: Friends of the Atchafalaya Recommendations

Visit <http://www.atchafalaya.info> for meeting information and Basin news
email: foa@basinbuddies.org

Atchafalaya Basin Floodway System Environmental Issues

In 2013, Friends of the Atchafalaya submitted to the Commission our input on the environmental state of the Floodways.

We suggested the possibility of environmental maintenance modifications of the existing flood control features and operational modes.

We also suggested that there might be opportunities to redirect mitigation payments for construction projects to ongoing funding for restoration efforts.

Little has changed for the better in the Floodway and we continue to believe in the need for such action.

The primary mechanism for ecosystem restoration and preservation under the Atchafalaya Basin Floodway System (ABFS) Project, Louisiana Master Plan is the use of Water Management Units. Five units "... were determined to have the greatest potential for restoring historical overflow conditions to benefit the ecosystem... . The Buffalo Cove and Henderson Lake units were initially selected for pilot water management units."

The USACE continues to move forward on the Buffalo Cove pilot restoration project and hopefully, the results will lead to similar projects in the future, but Buffalo Cove should have shown us the difficulties of effectively implementing large restoration projects through a piecemeal approach:

1. For reasons not under the control of the Corps, work on the environmental restoration of the Floodway was interrupted by hurricanes and Federal funding limitations;
2. during the resulting hiatus, historic flood levels reconfigured the partially repaired features and damaged other areas, thereby changing the basis for some original design decisions and requiring additional engineering and construction work to complete the goals of the project;
3. landowner issues further complicate the restoration process;
4. a decade after the Buffalo Cove project was finally initiated, we are still awaiting completion of the initial construction phase;
5. some of the original proponents of Buffalo Cove restoration, originally described in the ABFS Feasibility Study: Main Report and Environmental Impact Statement, dated 1982, are no longer with us; and
6. of the thirteen water management units considered for implementation in the 1982 Report, only Buffalo Cove has even been designed.

From the ABFS Project, LA Master Plan, dated 2000:

"The goals of the management units, as stated in the ABFS, Final EIS (1982), were to restore and preserve unique and environmental values by restoring historical overflow patterns, ensuring proper water movement through the units, and where possible, restricting sediment movement and deposition in the units. The EIS noted that historical levels of flooding should be preserved.

“These goals were to be originally achieved using active water management practices.”

The Plan went on to explain that the original goals had been modified and consolidated to better address the dynamic nature of the water management areas and the changes that occurred since the original analysis and plan formulation.

The new Plan stated, “The modified management goal is to prolong the life expectancy of the productive habitat that will become scarce over time (primarily aquatic and cypress tupelo habitats).

The Plan also stated, “The new goal will be implemented using passive water management techniques, rather than through active management.”

A reasonable person could conclude that implementation has not come easily and that the stated goals are not being met.

The change from an active management approach to passive features and the “Adaptive Management” approach, described in the 2000 Plan, was a reaction to restoration difficulties in an effective flood control system and the fiscal realities of limited funding, spread across many needs. The concept is very attractive in that it does not require unrealistically accurate predictions of the future state of a dynamic system. The approach is widely accepted as necessary, when attempting to modify such a system. It is also more attractive from a fiscal perspective, because it uses a time-tested approach to needs shifting: it trades short term, high cost dollars for long term commitments.

The obvious problem with the new approach is that, in order to make significant changes, the long term commitments must be sustained across political events and policy shifts. If the approach is sustained and adapted to changing conditions, it can be a very effective way of preserving and maintaining the productivity of previously existing habitat, but it requires consistent, ongoing support from government agencies and legislators.

The ABFS restoration effort is a “poster child” for the failure of government to effectively implement adaptive management strategies as a tool for environmental restoration.

The only obvious solution is adoption of a higher priority for environmental restoration, alongside flood protection, transportation, and other forms of commerce in the ABFS.

Acknowledgement that more natural water flow and healthy habitat support commercial fisheries and the tourism and recreation industries in this State and others would be a good start. Recognition of the effects of a healthy natural environment on human health would carry the discussion forward.

Friends of the Atchafalaya respectfully petitions the Mississippi River Commission and the US Army Corps of Engineers to consider raising the priority of the environmental health of the ABFS in the Annual Report to the Secretary of the Army and his subsequent report to the Congress, for the purpose of elevating the discussion of habitat preservation and restoration in the ABFS.