

**Louisiana Crab Task Force**  
**Louisiana Shrimp Task Force**  
**Louisiana Oyster Task Force**

June 2, 2021

United States Army Corps of Engineers  
New Orleans District  
Attn: CEMVN-OD-SE, MVN-2012-2806-EOO  
7400 Leake Avenue, New Orleans, LA 70118

Email attachments sent to: [CEMVN-Midbarataria@usace.army.mil](mailto:CEMVN-Midbarataria@usace.army.mil)

Re: Mid-Barataria Sediment Diversion EIS

Dear Mr. LaBorde:

On behalf of the Louisiana Crab Task Force, Louisiana Shrimp Task Force and Louisiana Oyster Task Force please accept our joint comments regarding the above referenced Mid-Barataria Sediment Diversion draft EIS.

Note please that these three organizations, established by the State of Louisiana to represent the interests of our respective seafood industry segments, strongly and unambiguously stand in opposition to approval of the referenced draft EIS and to the Mid-Barataria Diversion Project as scoped and proposed.

Our reasons for such strong opposition are well documented and based on our long and deep history and knowledge of Louisiana's commercial fisheries, as well as our experienced understanding of the harsh and overwhelmingly negative impacts this \$2 billion project will have on both the economy and ecology of southeast Louisiana.

Representatives of our industries stand ready to answer any questions you may have in this regard or to provide additional detail as requested. Thank you in advance for your consideration or our points of view on this important topic.

Sincerely,

Mitch Jurisich,  
Chair, Joint Fisheries Task Force, State of Louisiana

## **Louisiana's Commercial Fishing Community Stands United Against Mid-Barataria Freshwater Diversion**

Over the past many months, the Coastal Protection and Restoration Authority (CPRA) has launched a vigorous and well-funded campaign to convince Louisiana residents, media and policy makers that its Mid Barataria Diversion Plan is the sure shot solution to solving our state's land loss problems. They have even gone so far as to put lipstick on this pig, re-branding the nearly \$2 billion project as a "sediment" diversion to disguise what it really is: a freshwater diversion of polluted river water that just happens to contain very limited amounts of sediment.

As representatives of Louisiana's commercial fisheries organizations, stewards of these valuable but limited resources for generations and employers of many of the thousands people who harvest, process and ship America's best seafood, we remain unconvinced. Put another way: We know better. And we stand united in opposition to this ill-conceived and counterproductive project that will do little to rebuild our coast but much to destroy our fisheries, our fisheries economy and our way of life.

Joining us in our strong opposition to this freshwater flood are the Parish Councils for Plaquemines, St. Bernard and St. Tammany, all of which know the demonstrated risks that come with such large-scale freshwater diversions. These Councilmembers know what we know – that better options exist and that this project will create more misery than land. They know that this project is a job killer for many residents of southeast Louisiana and a dagger for local economies. That is why these three councils voted so strongly in opposition to this latest freshwater flood.

From almost any rational point of view, the Mid Barataria Freshwater Diversion makes no sense.

First, this project touts its ability to build a new river delta where one has never existed. That is not coastal "restoration". Second, even the Corps of Engineers' Draft Environmental Impact Statement (EIS) acknowledges (but downplays) the fact that freshwater flooding disrupts the ecology and renewable resources such as seafood. As the EIS does make clear, it will take decades (if ever) for our oyster, crab, shrimp and shellfish resources to recover from the negative impacts of freshwater intrusion even if those persons who make their livings on the water never do.

The people who live and work in the potentially impacted area simply don't have decades to cool their heels while waiting for the resource to recover from an economic and ecological tsunami of unimaginable proportions. Third, while the dispersion of sandy river sediment through diversions will deceptively impact the optics, making the basin look green and lush due to a disproportionate nutrient influx from freshwater, in reality, because of poor root growth and low soil strength, the addition will do nothing more than provide very low-quality storm protection.

Lest anyone actually believe the environmental and marine life impacts will be minimal and of limited consequence and duration, consider the recently revealed state report that indicates that bottlenose dolphins would become "functionally extinct" in two of four areas of Barataria Bay, and the number of dolphins will drop dramatically in the rest of the bay, within 10 years of the start of operations of the proposed project. Put another way, a project trumpeted by many as the most reliable way to save the

coastal environment, will actually serve to help decimate the marine mammals that live there. And this is helpful how?

Lastly, and of critical importance to every taxpayer, this freshwater diversion project is a colossal waste of money. The draft EIS clearly states that the Barataria Basin will create an estimated 85,500 acres of wetlands by 2070 with the diversion yet with no action, the basin will still gain an additional 72,800 acres. At a sticker shock price of nearly \$2 billion that means this project will cost more than \$150,000 per acre to generate a mere 12,700 acres of new marshland over an extended 50-year period.

And although proponents of this project are quick to say that technically speaking, tax dollars aren't being used to plan and implement it, that statement belies the fact that that same money could in fact be better used to undertake projects that actually do more good than harm and by being of better value to the people of Louisiana.

To be clear, we, and our colleagues, friends and neighbors support responsible and well-designed projects that will save our coast and reduce land loss. Those projects include sediment dredging which has routinely and effectively been used all over coastal Louisiana with impressive results and without wrecking coastal economies, the lives of coastal residents or decimating an entire community of marine mammals.

As if all these negative impacts aren't enough, consider the deep economic impact a lack of seafood availability will have on our restaurants, on tourists who come to Louisiana in part to enjoy our bountiful seafood fresh from our coastal waters, on local residents who will undoubtedly pay far more to feed their families on our shrimp, crab, oysters and finfish than ever before, and on Louisiana's reputation as America's seafood market of choice.

As representatives of our state's crab, shrimp, and oyster industries, and employers of thousands of south Louisianians who may well lose their jobs in the diversion's flood waters, and who may not qualify for the kind of jobs CPRA claims will be created by the project, we urge the people, media and policy makers of Louisiana to join us in saying "no" to this massive, expensive and poorly designed project. Instead Louisiana should be exploring more viable and less intrusive options such as dredging, which has already been proven to reduce land loss and rebuild suitable habitat that protects our coast and coastal residents, and green tree reservoirs surrounded by levees which will have immediate storm protection without having the wait the estimated 50-years touted by CPRA's diversion plan.

In summary, those who know best - those who live in, work in and govern the communities that will be dramatically and irreparably impacted by this massive freshwater flood - urge CPRA and the Corps of Engineers to listen closely to our experienced voices, step back from the abyss they are pushing us toward, and thoughtfully and objectively review other alternatives that will actually do more good than harm.

Mitch Jurisich  
Louisiana Oyster Task Force

Acy Cooper  
Louisiana Shrimp Task Force

Brittany Dufrene  
Louisiana Crab Task Force