

Dear Task Force Members,

Almost a year ago, our organizations issued a joint report called “Common Ground: A Shared Vision for Restoring the Mississippi River Delta.” In our report, we compiled an agenda for restoration that details specific goals and actions the federal government must take to restore Louisiana’s coast and make it less vulnerable to man-made disasters like last year’s oil spill. Specifically, we outlined for the federal government three goals and recommended numerous actions to help achieve those goals. The goals include:

- (1) Securing short and long term funding for restoration;
- (2) Expediting strategic, already-authorized restoration projects, and integrating the federal comprehensive restoration plan with the State Master Plan; and
- (3) Ensuring effective governance of Mississippi River Delta restoration.

Today, we commend the White House on the progress the Administration has already made towards meeting each of those goals. Most importantly, we thank President Obama for issuing the Executive Order that established the Gulf Coast Ecosystem Restoration Task Force (Task Force). The Executive Order and your critical work to fulfill its charge are essential to fulfilling the President’s “*commitment to the Gulf Coast that goes beyond responding to the crisis of the moment*” and to creating “*a long-term plan to restore the unique beauty and bounty of this region.*” Further, we thank the Administration, the Trustee Council, and the Gulf states for securing the down payment from BP on its Natural Resource Damages. The down payment is a critical step towards securing necessary short-term funding for restoration. Moreover, we are pleased that the Army Corps of Engineers has advanced several Louisiana Coastal Area (LCA) restoration projects by delivering the required reports to Congress in December 2010. Finally, we thank you for lending your support to congressional legislation that dedicates the Clean Water Act penalties that BP and other responsible parties will pay to Gulf restoration. Such legislation is a top priority for our organizations because it is vital to restoring the Mississippi River Delta.

Despite all of this progress, Louisiana has continued to lose land at an alarming rate. Current estimates indicate that the Louisiana continues to lose land at a football field an hour. We believe that this continued collapse of the Mississippi River Delta requires a greater sense of urgency with respect to advancing and funding a comprehensive restoration program. And we urge the Task Force to review closely our Common Ground recommendations and to incorporate these goals and actions into its forthcoming strategy. While the progress described above as well as new information has changed slightly some of our recommendations, the majority remain the same as outlined in Common Ground. Below, we provide a succinct, updated list of our goals and pursuant actions.

Goal # 1: Secure Short- and Long-Term Funding for Restoration

Restoring the Mississippi River Delta will require significant and expedited funding. Current sources of federal and state funding are insufficient, and the construction of LCA projects

depends on yearly appropriations to the Corps, creating uncertainty and delay. We must act immediately to guarantee the substantial funds necessary for restoration.

Actions:

- Urge Congress dedicate a minimum of 80% of the BP oil spill Clean Water Act penalties to a fund that would be utilized for Gulf restoration purposes.
- Ensure that Natural Resource Damages fund restoration projects of sufficient scale and scope that they will align with efforts to restore the Gulf's long-term health and self-sustaining capacity.
- Direct the approximately \$250 million in New Orleans levee upgrade mitigation funds toward high-priority restoration projects.
- Urge Congress to fund the President's request to begin of the Army Corps of Engineers' LCA construction program in FY12.

Goal #2: Expedite Strategic, Already-Authorized Restoration Projects and Integrate the Federal Comprehensive Restoration Plan with the State Master Plan

A. Expedite strategic WRDA-Authorized Restoration Projects

In the 2007 Water Resources Development Act, Congress authorized many restoration projects that require an immediate investment. Those projects include: restoring coastal wetlands destroyed by the construction and operation of the **Mississippi River-Gulf Outlet** through projects that reintroduce water, sediment, and nutrients; constructing a **diversion at Violet** to provide freshwater to the Biloxi marshes; constructing a **diversion at White's Ditch** to provide freshwater and sediment to wetlands east and south of New Orleans; restoring Barataria Basin by implementing the **Barataria Shoreline Restoration project, modifying the existing Davis Pond diversion**, and constructing a **sediment diversion at Myrtle Grove**; implementing the **Terrebonne Barrier Island Restoration Project**; reintroducing larger amounts of Atchafalaya **River water and sediment into northern Terrebonne marshes**; and directing the Corps to design a **program to use dredged sediment** for restoration.

Actions:

- Begin construction on strategic, authorized LCA projects within one year by developing an implementation plan that taps existing statutory authorities, by instituting concurrent environmental review in order to compress project timelines, and by engaging the private sector in design-build.
- Create, within the Corps, a program to deliver sediment to priority areas in the Barataria and Breton basins.
- Change the Corps' policy of disposing of dredged sediment in the nominally least costly manner because it wastes millions of tons of valuable sediment each year that are needed for restoration.

- Set ambitious goals for sediment reintroduction, including 70% of the sediments of the Mississippi River into sediment-starved Delta wetland basins by 2020, and for project completion, such as completed construction of strategic LCA projects within five years.

B. Complete the Federal Comprehensive Restoration Plan

Congress has directed the Corps to prepare a comprehensive plan for coastal restoration and to integrate it with the State’s Comprehensive Master Plan for a Sustainable Coast (“State Master Plan”), created by the Louisiana Office of Coastal Protection and Restoration. Congress directed the Corps to consider strategies to make maximum, feasible use of sediment from the Mississippi and Atchafalaya Rivers for restoration through large-scale sediment diversions, among other means.

The federal plan will serve as the necessary comprehensive planning document to guide storm risk reduction and coastal restoration in a holistic, efficient manner. In addition to integrating the restoration plan with the Corps’ LACPR plan for 100-year flood protection, WRDA requires the plan to be developed in coordination with state planning efforts, including the State Master Plan. Louisiana is currently developing the 2010 State Master Plan.

Actions:

- Direct the Corps to use appropriate investigation funds to begin and complete the Federal Comprehensive Restoration Plan (WRDA 2007, Section 7002).
- Include all appropriate federal agencies in the Federal Comprehensive Restoration Plan process.
- Integrate the Federal Comprehensive Restoration Plan with the State Master Plan.
- Incorporate into the comprehensive plan assumptions about regional land sinkage and sea level rise through the year 2100, referenced in the U.S. Global Change Research Program’s report, *Global Climate Change Impacts in the United States*.

Goal #3: Ensure Effective Governance of Mississippi River Delta Restoration

A new federal management structure with a clearly defined goal must drive progress on a vision and plan projects in the short-term. The interim federal coordinating authority must use existing authority under WRDA, the Coastal Wetlands Planning, Protection, and Protection Act, and the Estuary Restoration Act to implement existing authorized projects.

Actions:

- Explicitly convene a joint meeting of the congressionally-authorized and overlapping restoration task forces, establish a standing common agenda and implementation plan.
- Advocate for federal legislation to create a new Gulf Coast Ecosystem Restoration Council to implement the Task Force’s strategy and direct the federal agencies’ efforts.
- Ensure that the Corps manages the Mississippi River below the Old River Control Structure jointly for restoration, navigation, and flood protection.

Thank you for considering our recommendations. For further elaboration as well as your reference and for the record, we have attached 1) a copy of the July 2010 “Common Ground” report, 2) a copy of testimony presented by EDF Senior Counsel Jim Tripp to the Gulf Restoration Task Force on June 27, 2011, 3) PowerPoint slides used by Mr. Tripp during the June 27th presentation, and 4) a draft science and economics white paper entitled “The Central Role of the Mississippi River and Delta in Restoration of the Northern Gulf of Mexico” that contains citations referred to by Mr. Tripp in his testimony.

The continuing collapse of the Delta requires immediate action. Our organizations appreciate the efforts of the Task Force and its commitment to public involvement in developing its restoration strategy. We would be happy to discuss these recommendations in further detail or answer any questions.

Sincerely,

Paul Harrison
Senior Director for Mississippi River
Environmental Defense Fund



Michael Daulton
Vice President for Public Policy
National Audubon Society



Karla Raettig
Program Director, Coastal Louisiana Restoration
National Wildlife Federation

