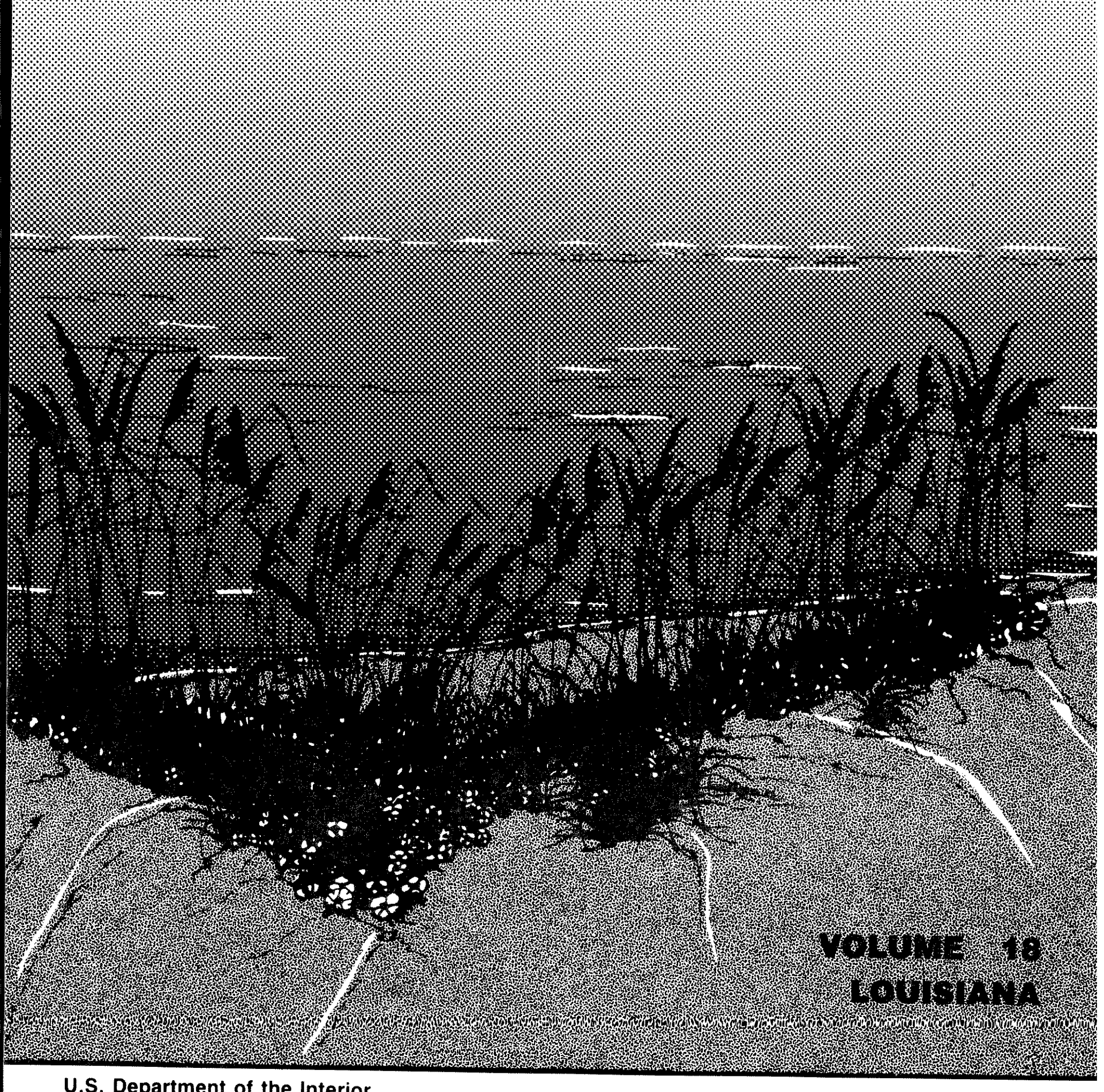
REPORT TO CONGRESS:
COASTAL BARRIER RESOURCES SYSTEM

Recommendations for Additions to or Deletions from the Coastal Barrier Resources System



VOLUME 18
LOUISIANA

U.S. Department of the Interior

REPORT TO CONGRESS: COASTAL BARRIER RESOURCES SYSTEM

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Recommendations for Additions to or Deletions from the Coastal Barrier Resources System

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Mapped, edited, and published by the Coastal Barriers Study Group

United States Department of the Interior
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1988

TABLE OF CONTENTS

LOUISIANA

INTRODUCTION

The Coastal Barrier Resources Act (CBRA) of 1982 (Public Law 97-348) established the Coastal Barrier Resources System (CBRS), a system of undeveloped coastal barriers along the Atlantic and Gulf of Mexico coasts. This atlas of coastal barriers in Louisiana has been prepared in accordance with Section 10 of CBRA (16 U.S.C. 3509), which states:

> Sec. 10. Reports to Congress.
>
> (a) In General.--Before the close of the 3-year period beginning on the date of the enactment of this Act, the Secretary shall prepare and submit to the Committees a report regarding the System.
> (b) Consultation in Preparing Report.--The Secretary shall prepare the report required under subsection (a) in consultation with the Governors of the States in which System units are located and with the coastal zone management agencies of the States in which System units are located and after providing opportunity for, and considering, public comment.
> (c) Report Content.--The report required under subsection (a) shall contain--
>
> (1) recommendations for the conservation of fish, wildlife, and other natural resources of the System based on an evaluation and comparison of all management alternatives, and combinations thereof, such as State and local actions (including management plans approved under the Coastal Zone Management Act of 1972 (16 U.S.C. 1451 et seq.)), Federal actions (including acquisition for administration as part of the National Wildlife Refuge System), and initiatives by private organizations and individuals;
>
> (2) recommendations for additions to, or deletions from, the Coastal Barrier Resources System, and for modifications to the boundaries of System units;
>
> (3) a summary of the comments received from the Governors of the States, State coastal zone management agencies, other government officials, and the public regarding the System; and
>
> (4) an analysis of the effects, if any, that general revenue sharing grants made under section 102 of the State and Local Fiscal Assistance Amendments of 1972 (31 U.S.C. 1221) have had on undeveloped coastal barriers.

Under the direction of the Assistant Secretary for Fish and Wildlife and Parks, this report has been prepared by the Coastal Barriers Study Group, a task force of professionals representing the National Park Service, U.S. Fish and Wildlife Service, U.S. Geological Survey, and other Departmental offices.

This volume of the report contains delineations of the existing CBRS units in Louisiana and delineations of additions to and modifications of the CBRS in this State which the Department of the Interior recommends to the Congress for its consideration.

BACKGROUND

The primary coastal concern of Louisiana government, private industry, and knowledgeable citizens is coastal land loss. At present, the State is losing in excess of 40 square miles of coastal land per year. The cumulative loss since 1940 has been estimated at 500 square miles, an area equal to half of the entire State of Rhode Island. Land loss is largely a human-made problem directly tied to two coastal management and utilization practices: the prevention of Mississippi River flooding, and extensive canal dredging for navigation and access to oil fields in wetlands. A brief review of the practices which have led to wetland deterioration follows.

Louisiana was first settled by the French in 1699. Less than 20 years later, LaBlond de la Tour constructed the first levee along the Mississippi River for the protection of New Orleans. By 1828 a continuous levee, extending from above Baton Rouge to below New Orleans, had been completed and direct "management" of the Louisiana coastal wetlands had begun. The levees were enlarged and strengthened continuously during the subsequent century, and since the catastrophic flood of 1927, no significant levee breaches have occurred. Although levees are important for flood control, they also have a major detrimental side-effect: the sediment-laden, nutrient-rich freshwater which nurtured the Louisiana coastal wetlands by annual flooding

has been effectively cut off. Concurrently, increased dredging of industrial canals to serve inland ports and barge canals to access wetland oil and gas installations has altered waterflow patterns in the marshes. The breakdown of the natural flow patterns has allowed saltwater to intrude further inland, changing the plant communities in the coastal marsh and accelerating the rate of conversion of coastal wetlands into open bays and sounds (Boesch et al. 1983).

Subsidence, the sinking of the land surface, also contributes to the conversion of Louisiana's coastal lands into open water. Because of the soft and easily compactible nature of Mississippi delta muds, the coastal wetlands subside rapidly under their own weight. In addition, the large-scale extraction of oil and gas from relatively shallow subsurface reservoirs is a likely contributing factor to subsidence, although no one, as yet, has quantified the effects. There is strong circumstantial evidence that it has a major impact. Well-documented studies have shown that oil and gas extraction has caused tens of feet of subsidence in some California oil fields. A time-series analysis of tidal gauge data along the gulf coast found that a rapid rise in local sea level correlated with the onset of full-scale production of oil and gas off the Louisiana coast (Swanson and Thurlow 1973).

Regardless of the relative magnitude of natural and human causes of subsidence, all data indicate that the current average rate of local sea level rise on the Louisiana coast is about 1.2 cm per year. Of this, only about 1.5 mm is due to global "eustatic" change; the rest is caused by sinking of the land (Nummedal 1983). Because of the leveeing of the Mississippi River, the average sedimentation rate in the Louisiana marsh appears to be only about 5 mm per year (Baumann 1980). The resulting deficit, a 6-mm annual lowering of the sediment surface relative to the sea, is a major cause of coastal landloss.

Not only are Louisiana's coastal wetlands turning into open water, but the frontlines of natural coastal defense, the barrier spits and islands, are also rapidly deteriorating. Though deterioration is part of the natural cycle of deltaic barrier island evolution, the rate of deterioration is locally accelerated by human interference with the longshore sediment transport system.

Louisiana's coastal barriers derived their sediment from abandoned sandbars in the mouth of the shifting Mississippi River channel. As the waves and longshore currents of the gulf coast "mined" these sands and constructed chains of barrier islands, such as Chandeleur and Timbalier Islands and Isles Dernieres, the abandoned delta lobe itself slowly subsided. This subsidence had two major impacts: (1) seawater began encroaching behind the barriers, separating them from the adjacent mainland by ever-expanding bays and sounds, and (2) the river-mouth bars, which once acted as sand sources to feed the barriers, ultimately subsided beneath the reach of the waves. Consequently, sand delivery ceased and the barrier could only rework its own finite supply of sand in response to storms and hurricanes. With time, the sand of the coastal barriers is distributed into deep migratory tidal inlet channels, some is washed into the deepening back-barrier bay, and some is carried seaward onto the Inner Continental Shelf. With these continuing losses, and no net sand supply, the barrier is ultimately entirely submerged. This is probably how Ship Shoal, off the central Louisiana coast, was formed (Nummedal et al. 1984). The Louisiana coastal barriers have retreated 2 to 3 km over the last century. At present, they continue to erode in many places at rates as high as 15 to 20 meters per year (Penland et al. 1981). According to a special report prepared for the Louisiana legislature, the total acreage of offshore barrier islands was reduced by 50 percent in the 23-year time span from 1955 to 1978.

Total Louisiana coastal land loss appears to have increased in a geometric progression. In the Mississippi Deltaic Plain alone, the rate of land loss increased from 6.7 square miles per year in 1913, to 39.4 square miles per year in 1980. In addition, the Chenier Plain (the western Louisiana coast) lost 7.7 square miles per year in the time period of 1952 to 1974 (Gagliano et al. 1981). If these rates of land loss continue, it has been projected that Plaquemines Parish (part of the "birdfoot" Mississippi Delta) will all but disappear in the next 50 years, Terrebonne Parish will disappear over the next 100 years, and Lafourche Parish has perhaps a 200-year life expectancy.

One exemption from the general provisions of CBRA pertains specifically to the Louisiana coast. This is contained in Section 5(a)(3), which states that no financial assistance may be made available under the authority of any Federal law to carry out any project to prevent the erosion of, or to otherwise stabilize, any inlet, shoreline, or inshore area except those in Louisiana CBRS units designated pursuant to Section 4 on maps numbered S01 through S08 and for purposes other than those encouraging development. However, Section 6 also states that Federal financial assistance may be available for (1) any use or facility necessary for the exploration, extraction, or transportation of energy resources which can be carried out only on, in, or adjacent to coastal water areas because the use or facility requires access to the coastal water body; and (2) maintenance of existing channel improvements and related structures, such as jetties, and including the disposal of dredge materials related to such improvements.

A letter from the Governor to the Secretary of the Department of the Interior and related testimony from State agencies and consultants make it very clear that the State of Louisiana wants to protect and enhance its barrier islands for purposes other than development. Louisiana does not encourage residential development of its barriers, as pointed out by the Governor, because the barriers are essentially "undevelopable" because of their isolated location, foundation characteristics, and limited size. Also, the extensive energy development and related industrial uses of Louisiana's coastal zone have made most of the barriers unsuited for residential or recreational types of development.

COASTAL RESOURCE MANAGEMENT

Louisiana Coastal Resource Management

Coastal management in Louisiana differs from that in other States because of the land loss issue. This was recognized in the CBRA and was the rationale behind the exception to the Act that applies to Louisiana (discussed in previous section).

The State's coastal zone management effort is presently carried out by the Coastal Management Division (CMD) of the Department of Natural Resources (DNR), which handles permits, and the Coastal Protection Task Force, a Governor's advisory body which is responsible for implementing a program aimed at slowing the trend of coastal land loss.

The State's coastal zone management program began as a study effort in Louisiana State University's Center for Wetland Resources in the early 1970's. This effort led to the formulation of a Louisiana Wetlands Prospectus in 1973 with recommendations for appropriate legislation. At the time, the State had no wetlands regulation.

Act 361, the State and Local Coastal Resources Management Act. In 1978, the Louisiana Legislature passed this Act. Its declared purpose was to protect, develop, and, where feasible, restore or enhance the resources of the State's coastal zone. The Act established a series of regulations and guidelines and gave the authority for their implementation to the Louisiana Department of Natural Resources. The formulation, hearings, and Coastal Commission approval process for the proposed rules and regulations took 2 years. The Louisiana Coastal Zone Management Program was approved by the Governor and the Federal Office of Coastal Zone Management in late summer 1980.

Local governments have the authority under Act 361 to establish their own Local Coastal Management Programs (LCMP's). To date, however, only Lafourche Parish has an approved LCMP.

Guidelines and regulations in the Louisiana Coastal Management Program of specific relevance to the CBRS units include the following.

Guideline 3.7. Linear facilities (e.g., pipelines) involving dredging shall not transverse or adversely affect any barrier island.

Guideline 3.8. Linear facilities involving dredging shall not transverse beaches, tidal passes, protective reefs, or other natural gulf shoreline unless no other alternative exists. If a beach, tidal pass, reef, or other natural gulf shoreline must be transversed for a nonnavigation canal, they shall be restored at least to their natural condition immediately upon completion of construction. Tidal passes shall not be permanently widened or deepened except when necessary to conduct the permitted activity.

Guideline 3.11. All nonnavigation canals, channels, and ditches which connect more-saline areas with fresher areas shall be plugged at all waterway crossings, and at intervals between crossings, in order to compartmentalize them. The plugs shall be properly maintained.

Guideline 5.1. Nonstructural methods of shoreline protection shall be used to the maximum extent practicable.

Guideline 5.6. Marinas and similar commercial and recreational developments shall, to the maximum extent practicable, not be located so as to result in adverse impacts on open productive oyster beds or submersed grass beds.

Act 41. Passed in 1981, this Act established a $35 million Coastal Protection Trust Fund that is to be used to enhance and restore coastal wetlands and barriers. The Coastal Protection Task Force was created a year later to oversee the implementation of this enhancement and restoration program.

The legislative report accompanying Act 41 recommended that the State initiate construction activities to restore three coastal barrier areas subject to critical erosion, and initiate pilot projects aimed at creating land in the Mississippi Delta region by breaking holes in the levee to form new subdeltas.

The initial research component of the Act 41 barrier restoration program is essentially complete. The three affected areas include CBRS units. The barrier areas chosen for restoration are: (1) the Grand Ronquille area, (2) the eastern part of Isles Dernieres, and (3) the Holly Beach-Peveto Beach area. In all three areas, the plan is to construct an "anchor" structure and then nourish the beach with sand to be dredged from offshore deposits.

The U.S. Army Corps of Engineers, under a cost-sharing agreement with the State, recently began construction of a diversion structure on the Mississippi River at Caernarvon. Freshwater from the river will be siphoned across the levee and released into the coastal marshes. Two other diversion projects are in the planning stages.

EXISTING CBRS UNITS

Except for Cheniere au Tigre, all Louisiana CBRS units are grass-covered barriers with some black mangrove and other shrubs. This chenier, however, has a well-developed coastal climax forest composed of live oaks (the French word for oak is "chene," hence, chenier) and palmetto. Furthermore, all the barriers in the system are young, a few hundred to about two thousand years old, and very low in topographic profile. Many are beachridge barriers, but the ridges are not associated with any significant dune fields to enhance their relief. Their young age and rapid migration probably in part account for this.

A brief description of each existing CBRS unit in Louisiana is provided below. Each unit is identified by its ID code and name (established by Congress in 1982) and the parish (county) in which it is located.

CBRS UNITS IN LOUISIANA ESTABLISHED BY CONGRESS, 1982

Unit Name	Unit ID Code	Parish	Shoreline Length (miles)	Total Area (acres)	Fastland Area (acres)
Bastian Bay Complex	S01	Plaquemines	6.0	1,660.9	205.7
Bay Joe Wise Complex	S01A	Plaquemines	5.4	1,081.0	259.9
Grande Terre Islands	S02	Jefferson	1.9	1,040.1	106.9
Caminada	S03	Jefferson and Lafourche	2.8	726.1	119.5
Bay Champagne	S04	Lafourche	6.8	2,553.4	275.2
Timbalier Island	S05	Lafourche	11.3	8,151.7	632.8
Isles Dernieres	S06	Terrebonne	17.6	13,773.1	567.1
Point au Fer	S07	Terrebonne	14.5	14,010.6	228.0
Cheniere au Tigre	S08	Vermilion	1.6	620.9	56.8
Rollover	S09	Vermilion	1.0	122.1	22.3
Mermentau River	S10	Cameron	13.4	9,773.8	492.8
Sabine	S11	Cameron	9.4	5,729.6	1,550.9
Totals:			91.7	59,243.3	4,517.9

S01-Bastian Bay Complex (Plaquemines). This unit is separated into two subunits. The southeasternmost subunit includes the eastern portion of Pelican Island between the jetties of Bayou Fontanelle and Scofield Bayou. Scofield Bayou and the beach 1.3 miles to the east are also included in this unit. The western subunit consists of Bastian Island and the western remnant of Lanaux Island. This subunit separates Bastian Bay from the Gulf of Mexico. The landward boundary of this subunit extends into and includes a portion of the Bastian and Shell Island Bay bottoms.

The Bastian Bay Complex comprises deteriorating and subsiding marshlands fronted by a narrow, low-elevation beach. It is part of the Plaquemines Delta system, which formed within the last 600 years. The beach material is predominantly fragmented oyster shells. The recurved spit bounding the eastern side of Grand Bayou Pass has ridges that attain elevations of 6 to 7 feet and are made entirely of oyster shells. The predominance of narrow, shell-dominated beaches fronting this complex indicates that there is a lack of sandy sediments in the vicinity (McGowen et al. 1977). The relative youth of this region of coastal Louisiana is shown by the marshes which still connect the mainland to Pelican and Lanaux Islands. These marshes are subsiding quickly because of the compacting of the deltaic sediments.

This region is frequently flooded because of its very low elevation. Dominant longshore sediment transport is toward the northwest. The erosion downdrift of the jettied channel has resulted in the deterioration of Lanaux Island. An open channel, Lanaux Pass, now persists where there once was a narrow tongue of beach fronting Shell Island Bay.

S01A-Bay Joe Wise Complex (Plaquemines). This unit extends from the west side of the channel at Grand Bayou Pass westward to an oil field access channel which cuts Bay La Mer in two. Bayou Chaland flows to the gulf through Bay Chaland near the middle of the unit. The landward boundary of the unit has been drawn where pipeline canals meet, forming a narrow but continuous line of open water in the back bay.

The beaches fronting Bay Joe Wise are narrow with high shell content, similar to those of Bastian Bay Complex. They are low in elevation and overwashed during abnormally high tides and mild storm-wave activity. Longshore transport directions can vary between east and west. However, there is no local sediment supply to feed the longshore currents. Erosion rates along this portion of the coastline range between 15 and 30 feet per year. Beach sediments are sand and shell. The marsh region behind the beach is crisscrossed with dredged pipeline and petroleum installation channels. Access is limited to boat and air transportation.

S02-Grande Terre Islands (Jefferson). This unit covers the eastern portion of the island between the Louisiana Department of Wildlife and Fisheries' camp airstrip to the west and the Plaquemines/Jefferson Parish boundary, which runs through Pass Abel Channel, on the east. The barrier island is one of a small chain of islands that separates Barataria Bay from the Gulf of Mexico. It is separated from the mainland by Barataria Pass on the west and Pass Abel on the east. West of the Louisiana Department of Wildlife and Fisheries' camp and bordering Barataria Pass are the remnants of Fort Livingston, built during the Civil War period.

Beach ridges observed in aerial photographs of Grande Terre indicate it was formed from the east when longshore currents were directed westward. Sediments for this island probably came from earlier Mississippi River Delta lobes to the east. Although the beach ridges in the island's interior were built by westward drift, the present beach sands originate from the Caminada-Moreau headland to the west. The beaches of Grande Terre are composed of fine to medium-size sand with some shell material and are narrow

away from the ends of the island. At the eastern end of the island, the beach widens into an extensive recurved spit which does not appear to be migrating into Pass Abel.

Grande Terre's beachfront is eroding at an estimated rate in excess of 30 feet per year (Penland and Boyd 1981). In addition to erosion, the island's low elevation makes it susceptible to flooding during storm surge. The interior of the island is densely vegetated with scrub brush and grass used to graze a local population of cattle, horses, and some goats. There are very few trees. The portion of the island within the unit is incised by pipeline canals and access channels. The borders of these channels are oyster-rearing sites.

S03-Caminada (Jefferson and Lafourche). This unit is bordered by the middle of Caminada Pass on the east. It extends westward to the point where the spit connects to the Caminada-Moreau headland. Landward, the CBRS unit boundary runs down the middle of the narrow bay behind the spit and along a pipeline canal which parallels the coast along the headland.

This unit is a flanking barrier spit growing eastward. Sediments derived from the headland are moved along the spit by the prevailing easterly longshore currents. The frequency with which this spit is overwashed is reflected in its form--the back beach area is essentially a washover terrace. The beach itself is very narrow with elevations not exceeding 5 feet. Erosion rates on the beach vary from 15 feet per year at the western end to no erosion at the distal end of the spit. Narrow salt marshes are present on the bay side of the beach. Marsh material also underlies the beach and is frequently exposed on the beach face. The eastern end of the spit bordering Caminada Pass may be fragmented during wave attacks accompanying storm surge.

Access to Caminada Spit is through unimproved roads on Elmers Island. The spit is used frequently for recreational camping, fishing, and hunting.

S04-Bay Champagne (Lafourche). This unit is broken into two subunits. The eastern subunit lies between the Winner Wildlife Area to the east and the truncated channel of Pass Fourchon to the west. The landward boundary runs along a pipeline canal east of Bay Champagne, then skirts the bay where it picks up an open channel that joins the Pass Fourchon waterway. The western subunit extends westward from the centerline of the channel at Belle Pass to the west side of Raccoon Pass. The landward boundary runs along a wide, natural channel which connects Timbalier Bay and a dredged access channel located about two-thirds of a mile in back of the jettied channel of Belle Pass. The line drawn landward of Raccoon Pass indicates that a portion of Timbalier Bay bottoms are included in this unit.

The eastern subunit is a flat and wide strandplain beach. Its low elevation allows frequent flooding and washover. The narrow portion of the barrier in front of Champagne Bay is breached annually. The tidal pass that is created quickly closes as sediment transported from updrift sources to the west fills the channel.

The east jetties of Belle Pass have blocked the longshore sediment movement of the western unit. The updrift accumulation has caused accretion on the shore east of the channel and extensive erosion downdrift within the CBRS unit. Sediment starvation to the eastern portion of east Timbalier Island has caused the island to narrow and breach. Erosion rates in this vicinity are in excess of 40 feet per year (Penland and Boyd 1981).

S05-Timbalier Island (Lafourche). This unit is located between the east side of Little Pass Timbalier and Wine Island Pass to the west. Remnant intertidal shoals derived from the westward end of East Timbalier also are included in this unit. The landward border skirts the landwardmost extent of marsh which dominates the bayside of the island. East Timbalier Island is not included in the unit.

Timbalier Island originally formed as a flanking spit which grew west from the Caminada-Moreau headland. The spit became a barrier island when it detached from the headland. The western end of the island is accreting at the expense of its eastern and central portions. Erosion rates of 50 feet per year on the eastern end are matched by accretion rates of 50 feet per year to the west where a spit is growing into Wine Island Pass (Penland and Boyd 1981). The lack of sediment supply to the island results from jetties and revetments to the east which prevent sand from entering the longshore drift. East Timbalier Island has been reveted with boulder size stones since 1964, and the updrift jetty of Belle Pass has redirected beach sediments in an offshore direction.

S06-Isles Dernieres (Terrebonne). This unit contains the Isles Dernieres barrier island arc system in its entirety. The eastern boundary is Wine Island Pass, and the western line is approximately one-half mile west of Raccoon Point. The landward boundary is drawn nearly east-west along the open water of the narrow lagoon behind the island. This boundary bisects both Old Camp Pass and Caillou Boca.

Historical charts dating back to 1853 show that the Isles Dernieres were once part of the headland of an earlier lobe of the Mississippi River. The arc system was formed when the deltaic sediments underlying the marshy headland subsided, forming Big Pelto and Pelto Bay. The size of the back bay has enlarged during the past hundred plus years, forming Lake Pelto, which now separates the Isles Dernieres from the mainland by several kilometers. During this time, the island has also eroded over a kilometer and has been fragmented into five smaller islands. The headland which once supplied sediment to the barrier system is no longer a viable source of sand. Predominantly southerly waves transport what sand is left in the system from the central Isles Dernieres to both east and west flanks, eroding the central portion of the island at a faster rate than the ends (Penland and Boyd 1981).

The Isles Dernieres are a very fragile environment with narrow, eroding beaches of limited elevation. The beach morphology has been described as a continuous washover terrace. The limited marsh area on the bay side of the island is rapidly drowning. Toward the central portion of the island, the marsh is cut by a remnant channel of Trinity Bayou and some pipeline and petroleum installation access canals. Access to the islands is limited to boat or helicopter.

S07-Point au Fer (Terrebonne). This unit is made up of two subunits. The eastern unit runs approximately 2 miles along the coastline east of the midchannel line of Oyster Bayou. The landward boundary runs along a very minor, meandering tributary of Oyster Bayou, which bisects two pond-size water bodies. The western subunit, which constitutes the bulk of this CBRS unit, begins about a half mile west of a dammed pipeline canal and includes the remainder of Point au Fer Island to Point au Fer. The landward boundary includes a small portion of the Atchafalaya Bay Bottoms (which are also protected as part of the Atchafalaya Delta Wildlife Management Area) and runs along Locust Bayou. At the Point au Fer oil field, the boundary shifts to the east, and then southeast along a pipeline canal.

The unit shoreline is dominated by marsh and fronted by largely unvegetated mudflats. Shell reefs fringe the landward side of Point au Fer. The majority of this unit is salt marsh exhibiting little variability in topography. The low elevation makes it especially susceptible to flooding. Pipeline canals and installations associated with the petroleum industry are the only forms of development in this area.

S08-Cheniere au Tigre (Vermilion). This unit is a very small area of coastline that connects two larger, otherwise protected areas. To the north and east of the unit boundaries is the Paul J. Rainey Wildlife Sanctuary, while to the west the land is owned by the Louisiana Department of Culture, Recreation, and Tourism.

This unit lies at the seaward and easternmost extent of an ancient beach ridge known as Cheniere au Tigre. It is vegetated by grass and scrub oaks. Supplies of muddy sediment from the Atchafalaya River separate the ridge from the shoreline by forming seaward-growing mudflats. The area of Cheniere au Tigre in this unit has a narrow, steep, shell hash sand beach where the sediments of the chenier ridge itself are eroded onto the beach.

S09-Rollover (Vermilion). This unit is a corridor of coastline extending to the east of the Rockefeller Wildlife Refuge. The landward boundary runs along the open water of a pipeline canal less than a half mile from the coast.

The coastline fronting this unit is a largely unvegetated mudflat. The sand and shell content of the fluid mud is generally less than 5 percent (Wells and Kemp 1981). The source of the mud is offshore and to the east from the Atchafalaya River (Wells and Kemp 1981). This mudflat has been building westward from the coastline near Marsh Island since 1954 (Adams et al. 1978) when the Atchafalaya Delta also began building. According to Wells and Kemp (1981), this mudflat growth may be temporary and could be quickly eroded.

S10-Mermentau River (Cameron). This unit is a lengthy coastal barrier stretching from Beach Prong west to the opening of the Mermentau River into the Gulf of Mexico. Unlike the irregular coastline east of Marsh Island, the shoreline in the western part of this unit has been straightened by incident and storm wave attack. This unit has no outside source of sediment to nourish its eroding shoreline. According to figures cited by Morgan and Larimore (1957), this region is retreating at rates approaching 16 feet per year. What beaches occur along this shoreline are constructed from material derived from within the system. Along Hackberry Beach, the shoreline has eroded into old beach ridges. The sand is mined, reworked, and added to the retreating beach face. East of Hackberry Beach, beach material overlies older marsh material which frequently is exposed on the beach (Wells and Kemp 1981). Longshore sediment transport in this region is westerly; however, the minimal sediment moving along this coastline is illustrated by lack of accretion or erosion on the updrift or downdrift sides of the jettied channel to Lower Mud Lake.

Human-made structures found in the marsh-dominated area landward of the shoreline include pipeline channels, access channels, oil transfer stations, and other installations related to petroleum extraction. Hog Bayou Oil and Gas Field and Crab Lake Gas Field are located within this CBRS unit.

S11-Sabine (Cameron). This unit is a long stretch of cheniers and marshes fronting Blue Buck Ridge. Like Mermentau River, sediments are mined, reworked, and transported only within the immediate local area. Longshore sediment transport is westerly but minimal.

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RECOMMENDED ADDITIONS AND MODIFICATIONS

The Department of the Interior recommends that all undeveloped, unprotected coastal barriers and associated aquatic habitat identified in Louisiana be added to the Coastal Barrier Resources System. The DOI also recommends that otherwise protected, undeveloped coastal barriers be excluded from the CBRS. A portion of existing CBRS unit S07 is a State-protected Wildlife Management Area, therefore, DOI recommends it be deleted from the CBRS. However, if any otherwise protected, undeveloped coastal barrier is ever made available for development that is inconsistent with the purposes of the CBRA, the DOI recommends that it then be automatically included in the CBRS. A complete discussion of DOI's recommendations concerning otherwise protected, undeveloped coastal barriers, including suggested guidelines for acceptable development, appears in Volume 1. Maps of all otherwise protected, undeveloped coastal barriers in Louisiana appear in the following section. A table presenting the Department's position on each unit or proposed unit identified in Louisiana follows this discussion.

The Department of the Interior's recommendations were developed after full consideration of the many public, State and Federal Agency, and Congressional comments on the delienations in the Draft Report released in March 1987. The State of Louisiana reviewed the 1987 Draft Report and made recommendations on several existing and proposed CBRS units in the State. These recommendations are discussed in the following section, interspersed with the appropriate maps. The State expressed no opinions on the DOI's general recommendations to Congress.

The Department received 6 other comment letters concerning Louisiana. One expressed general support for the CBRS expansion in the State. Another suggested that the wetlands south of New Orleans near Leeville might qualify for addition to the CBRS; however, these wetlands are more than 5 miles inland and thus are ineligible for addition to the CBRS under DOI criteria. Substantive comments concerning individual existing and proposed CBRS units are discussed and reprinted in the following section, interspersed with the appropriate maps.

SUMMARY OF RECOMMENDATIONS FOR COASTAL BARRIERS IN LOUISIANA

Unit ID Code[a]	Unit Name[b]	Parish	Congress. Dist.[c]	Shoreline Length (miles)[d]	Total Area (acres)[e]	Fastland Area (acres)[f]	Recommendation[g]
LA-01	Isle au Pitre	St. Bernard	1	4.0	6,280	79	Add to CBRS
LA-02	Grand Island	St. Bernard	1	2.7	5,989	65	Add to CBRS
S01	Bastian Bay Complex	Plaquemines	1	13.1	12,343	653	Add new area to existing CBRS unit
S01A	Bay Joe Wise Complex	Plaquemines	1	8.6	5,621	507	Add new area to existing CBRS unit
S02	Grande Terre Islands	Plaquemines Jefferson	3	6.1	9,313	289	Add new area to existing CBRS unit
S03	Caminada	Jefferson Lafourche	3	7.6	25,595	456	Add new area to existing CBRS unit

(continued)

SUMMARY OF RECOMMENDATIONS FOR COASTAL BARRIERS IN LOUISIANA (CONCLUDED)

Unit ID Code[a]	Unit Name[b]	Parish	Congress. Dist.[c]	Shore-line Length (miles)[d]	Total Area (acres)[e]	Fast-land Area (acres)[f]	Recommendation[g]
S04	Bay Champagne	Lafourche	3	9.4	15,415	371	Add new area to existing CBRS unit
S05	Timbalier Island	Lafourche Terrebonne	3	15.9	19,128	844	Add new area to existing CBRS unit
S06	Isles Dernieres	Terrebonne	3	17.6	39,978	567	Add new area to existing CBRS unit
S07	Point au Fer	Terrebonne St. Mary	3	23.9	82,986	818	Add new area to and delete State Wildlife Management Area from existing CBRS unit
S08	Cheniere au Tigre	Vermilion	7	3.7	2,641	349	Add new area to existing CBRS unit
LA-07	Freshwater Bayou	Vermilion	7	16.1	38,085	3,154	Add to CBRS
S09	Rollover	Vermilion	7	1.0	5,223	22	Add new area to existing CBRS unit
S10	Mermentau River	Cameron	7	13.4	26,654	493	Add new area to existing CBRS unit
LA-09	Cameron	Cameron	7	12.5	4,854	987	Add to CBRS
LA-10	Calcasieu Pass	Cameron	7	10.4	31,016	1,005	Add to CBRS
S11	Sabine	Cameron	7	14.0	22,219	2,088	Add new area to existing CBRS unit
	Totals - CBRS as Recommended			180.0	353,340	12,747	
	Existing CBRS			91.7	59,243	4,518	
	Net Change in CBRS			+88.3	+294,097	+8,229	

[a]UNIT ID CODE - State initials (LA) plus a number identify a proposed new unit. An existing unit is identified by the legal code letter (S) and number established by Congress in 1982.

[b]UNIT NAME - For proposed new units, this is a provisional name based on a prominent local feature. For existing CBRS units, this is the legal name.

[c]CONGRESSIONAL DISTRICT - U.S. Congressional District in which unit is located.

[d]SHORELINE LENGTH - For existing units with additions or deletions, this length is for the entire unit, as modified.

[e]TOTAL AREA - For existing units with additions or deletions, this area is for the entire unit, as modified.

[f]FASTLAND AREA - This acreage is a rough estimate of the portion of the total area that is above the mean high tide line (i.e., the non-wetland area). It is a very general representation of the potentially developable land.

[g]RECOMMENDATION - A brief explanation of the Department's recommendations to Congress. For more detailed explanations, see the following section. Abbreviations: FWS = Fish and Wildlife Service, NPS = National Park Service, CBRS = Coastal Barrier Resources System.

1569

EDWIN W. EDWARDS
GOVERNOR

State of Louisiana
EXECUTIVE DEPARTMENT
Baton Rouge
70804-9004

POST OFFICE BOX 94004
(504) 342-7015

July 20, 1987

Coastal Barriers Study Group
U.S. Department of the Interior
National Park Service -- 498
P.O. Box 37127
Washington, DC 20013-7127

Dear Coastal Barriers Study Group:

I am forwarding to you a copy of the resolution passed by the Board of Commissioners of the Louisiana Shallow-Draft Ports and Waterways and additional correspondence concerning three areas presently included in the proposed Coastal Barrier Resources System.

I would like to ask you to give full consideration in accordance with the delineation criteria to the recommendations for excluding the areas shown in the attached maps of both the Port Fourchon (S04) and the Freshwater Bayou (LA-07) areas.

In addition, the area in the proposed unit (S07-Point Au Fer) covered by the maps on pages 31-34 of the "Report to Congress on the Coastal Barrier Resources System" is already protected by the state Department of Wildlife and Fisheries as the Atchafalaya Delta Wildlife Management Area. This protected status should qualify the area for exclusion from the Coastal Barrier Resources System.

If further information is needed please contact David Chambers (504-342-7469) of our Department of Natural Resources.

Yours very truly,

Edwin W. Edwards

encl.

cc: D. Chambers, DNR
Gary P. LaGrange
Vernon Behrhorst
Ted M. Falgout

1282

Working for the Nature of Tomorrow

NATIONAL WILDLIFE FEDERATION
1412 Sixteenth Street, N.W., Washington, D.C. 20036-2266 (202) 797-6800

Coastal Barriers Study Group
Department of the Interior
National Park Service
P.O. Box 37127
Washington, D.C. 20013-7127

RE: Comments on the Coastal Barrier Resources Act--Section 10 Draft Report to Congress, 52 Federal Register 9618-9619

Dear Sir or Madam:

The National Wildlife Federation, the Natural Resources Defense Council, the Coast Alliance, and the Oceanic Society are writing in response to the Department of the Interior's Federal Register Notice of March 23, 1987 solicitng comments on the Draft Report to Congress: Coastal Barrier Resources System--Executive Summary.

Our organizations have a longtime interest in the conservation of coastal barriers. The Natural Resources Defense Council was the founding organization of the Barrier Islands Coalition in 1978. Likewise, the National Wildlife Federation, the Coast Alliance, and the Oceanic Society became members of that coalition in 1979 to help seek protection of coastal barriers.

Our organizations have led efforts to pass legislation which would conserve the natural resources of coastal barriers--first, the flood insurance prohibition in the Omnibus Reconciliation Act in 1981 and then, the Federal financial prohibition in the Coastal Barrier Resources Act (CBRA) in 1982. We continue to support the goals of CBRA and expansion of the Coastal Barrier Resources System (CBRS) throughout the United State and its territories. The federal government should not be subsidizing development in hazardous areas which destroys productive coastal ecosystems, endangers the lives and properties of shoreline residents, and costs federal taxpayers millions of dollars each year in flood insurance claims and disaster relief.

The need for an expanded Coastal Barrier Resources System in which federal development subsidies are prohibited is becoming increasingly critical in light of the projected rise in sea levels due to global warming. As water levels rise, so will the costs of protecting existing structures, the damages from erosion and flooding, and the risk to human life and property. Unfortunately, however, development in these unstable coastal areas continues to grow at a frightening pace. We feel strongly, therefore, that it is essential that the Department recommend maximum expansion of the System to include the eligible areas on all of America's coasts

before these sites are irrevocably committed to development. An appendix of specific comments on additions to and deletions from the System follow our general comments.

PROPOSED RECOMMENDATIONS FOR ADDITIONS TO OR DELETIONS FROM THE CBRS

We support the Department's recommendation to expand the definition of a "coastal barrier" to include landforms which function as coastal barriers in protecting the mainland and adjacent aquatic habitats, even if they are not composed of unconsolidated sediments as are barriers in the traditional definition. Use of this expanded definition in delineating CBRS units is consistent with the conservation goals of CBRA and would allow for the inclusion of such new geological formations as undeveloped beach rock, cemented dunes, fringing mangroves and associated coral reefs, cheniers, discontinuous outcrops of bedrock, and coarse glacial deposits. Since these areas serve the same function as coastal barriers and are as vulnerable to development pressure, sea level rise, and storm damage as traditionally-defined coastal barriers, it is appropriate that they also be protected within the System.

APPENDIX

COMMENTS ON SPECIFIC COASTAL BARRIER AREAS

The National Wildlife Federation, the Natural Resources Defense Council, the Coast Alliance, and the Oceanic Society endorse the inclusion of all undeveloped coastal barriers identified by the Department of Interior in the March 1985 inventory, as well as some additional areas mentioned below. Following are our comments on some of the specific areas.

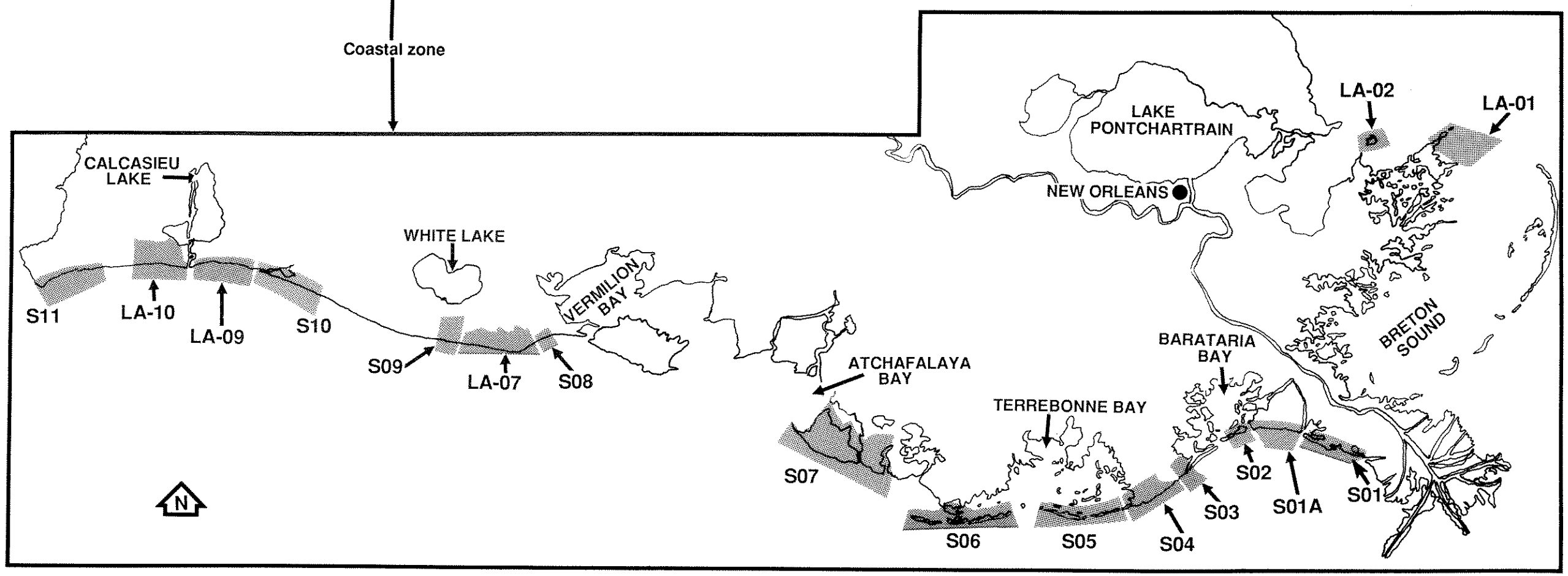
Louisiana

The State of Lousiana is suffering from severe coastal land loss--up to 40 square miles each year. Most of Lousiana's coastal barriers are low lying landforms which are subject to high erosion and flooding and are unsuitable for development. Along with the State, we support the Department's inventory of unit additions to the System in Lousiana.

INDEX TO EXISTING AND PROPOSED CBRS UNITS IN LOUISIANA

Coastal zone

USER NOTE: To locate the map(s) of each existing and proposed CBRS unit in this volume, consult the table on the following page.



MAPS DEPICTING EXISTING AND PROPOSED CBRS UNITS

Unit ID Code	Unit Name	USGS Topographic Map or Map Composite	Page
S01	Bastian Bay Complex	Pass Tante Phine	24
		Buras	25
		Bastian Bay	26
S01A	Bay Joe Wise Complex	Bastian Bay	26
		Bay Ronquille	27
S02	Grande Terre Islands	Bay Ronquille	27
		Barataria Pass	28
S03*	Caminada	Caminada Pass	29
		Leeville	30
S04*	Bay Champagne	Leeville	30
		Calumet Island	35
S05	Timbalier Island	Calumet Island	35
		Timbalier Island	36
		Cat Island Pass	37
S06	Isles Dernieres	Eastern Isles Dernieres	38
		Central Isles Dernieres	39
		Western Isles Dernieres	40
S07*	Point au Fer	East Bay Junop	41
		Oyster Bayou	42
		Fourleague Bay	43
		Plumb Bayou	44
		Point au Fer	45
S08	Cheniere au Tigre	Cheniere au Tigre	57
S09	Rollover	Mulberry Island West	59
		Rollover Lake	62
S10*	Mermentau River	Hog Bayou	65
		Creole	66
		Grand Bayou	67
S11*	Sabine	Peveto Beach	70
		Johnsons Bayou	71
		Texas Point	72
		Port Arthur	73
LA-01	Isle au Pitre	Door Point	15
LA-02	Grand Island	Grand Island Pass	16
LA-07*	Freshwater Bayou	Cheniere au Tigre	57
		Mulberry Island East	58
		Mulberry Island West	59
LA-09	Cameron	Grand Bayou	67
		Cameron	68
LA-10*	Calcasieu Pass	Cameron	68
		Holly Beach	69
		Peveto Beach	70

*Public comment summaries and DOI responses follow unit maps.

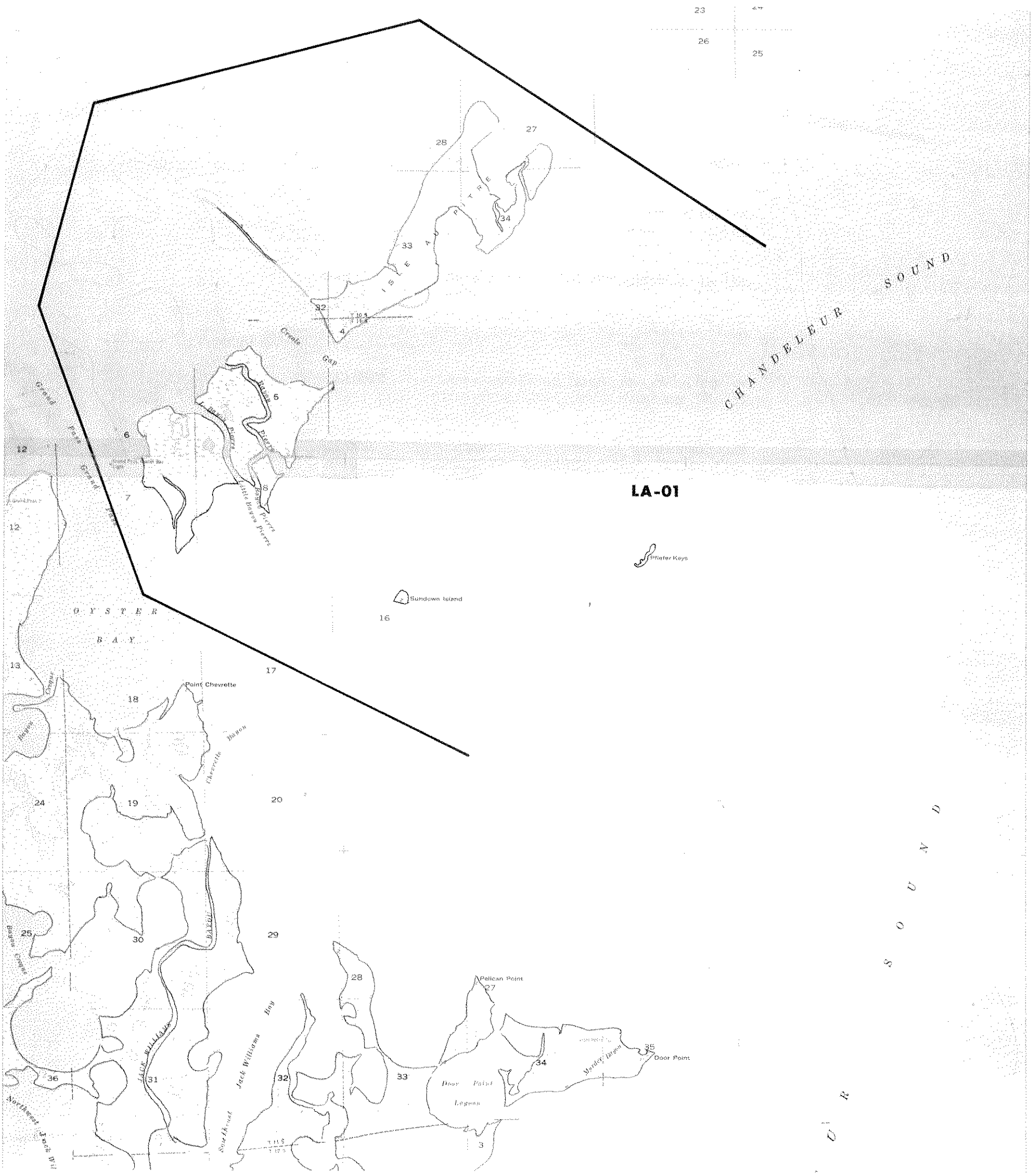
MAPS DEPICTING OTHERWISE PROTECTED, MILITARY, AND
COAST GUARD LANDS ON UNDEVELOPED COASTAL BARRIERS*

*These maps are provided for information purposes only. DOI is not recommending the addition of these areas to the CBRS unless they are made available for development that is inconsistent with the CBRA purposes.

MAP KEY

--------	Existing CBRS units
_____	Recommended additions to or deletions from the CBRS
.....	Military, Coast Guard, or otherwise protected, undeveloped coastal barrier
ADD	Area recommended for addition to the CBRS
DELETE	Area recommended for deletion from the CBRS
EXCLUDED	Area excluded from an existing or proposed CBRS unit because it is developed
FEDERAL	Federally protected, undeveloped coastal barrier; for information only
STATE	State protected, undeveloped coastal barrier; for information only
LOCAL	Locally protected, undeveloped coastal barrier; for information only
PRIVATE	Privately protected, undeveloped coastal barrier; for information only
MILITARY	Undeveloped coastal barrier owned by the military; for information only
COAST GUARD	Undeveloped coastal barrier owned by the Coast Guard; for information only

Maps are arranged in geographic order from east to west.



Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR

Mapped, edited and published
by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

QUADRANGLE

DOOR POINT

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

——— Solid lines depict recommendations for additions to or deletions from the Coastal Barrier Resources System. (Section 10 of P.L. 97 – 348.)

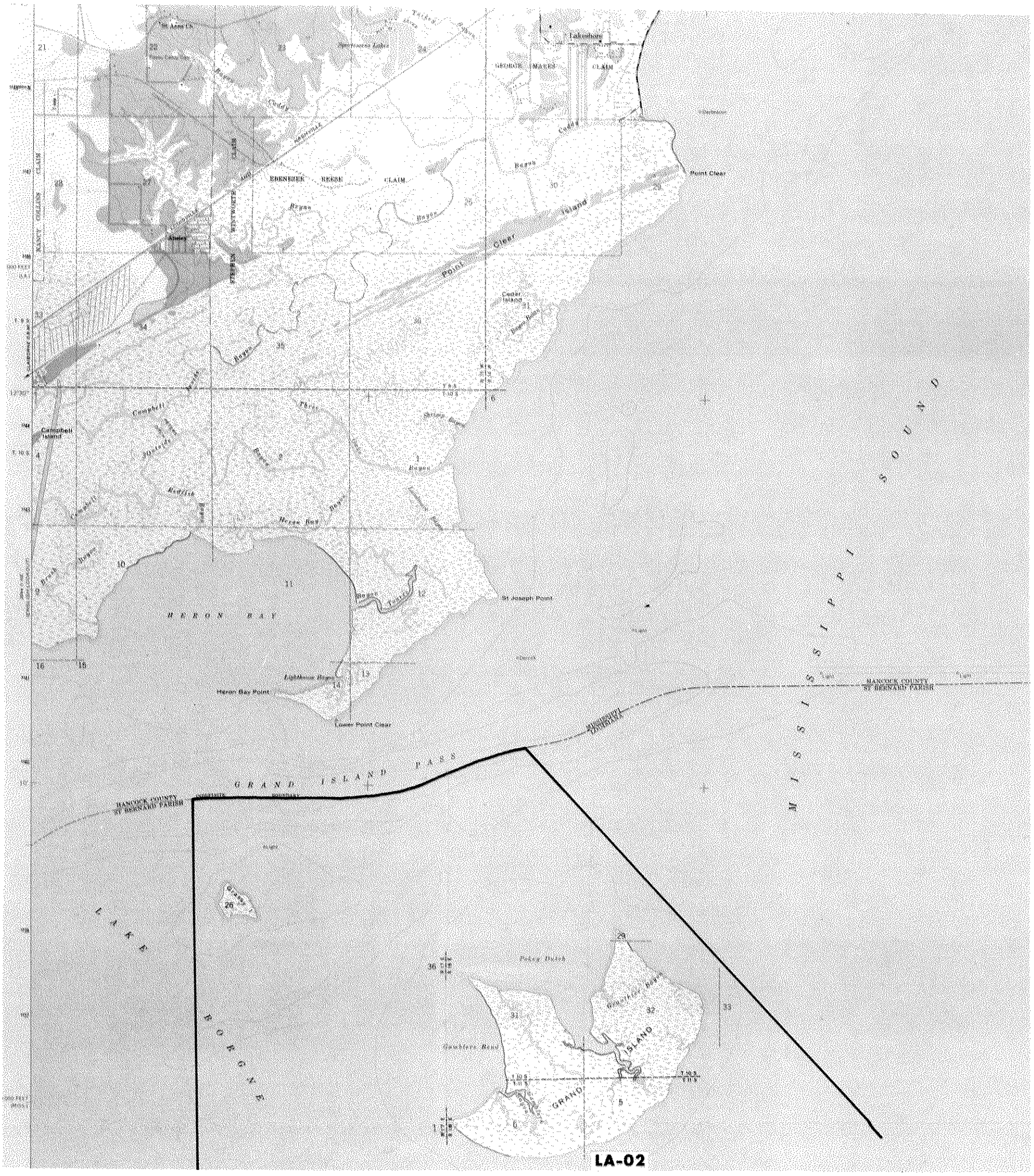
– – – – Dash lines depict approximate boundaries of existing units in the Coastal Barrier Resources System, for reference purposes only.

• • • • • Dotted lines depict approximate boundaries of an undeveloped coastal barrier that is "otherwise protected" or a military or coast guard property.

North

Base Map is the U.S. Geological Survey 1:24,000 scale quadrangle.

15



Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR

QUADRANGLE

GRAND ISLAND PASS

LOUISIANA

SCALE

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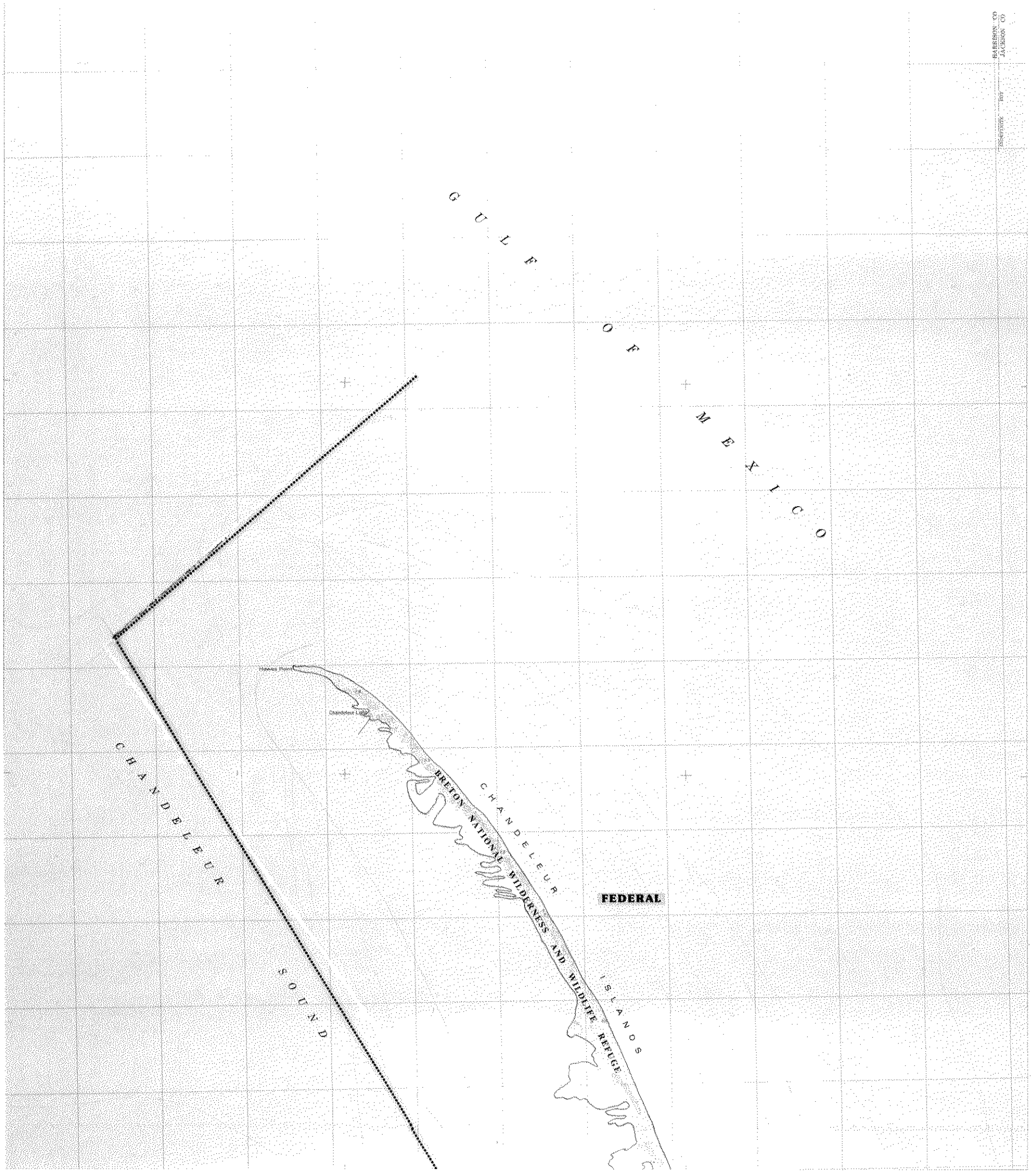
16



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QUADRANGLE

CHANDELEUR LIGHT

LOUISIANA

SCALE

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North

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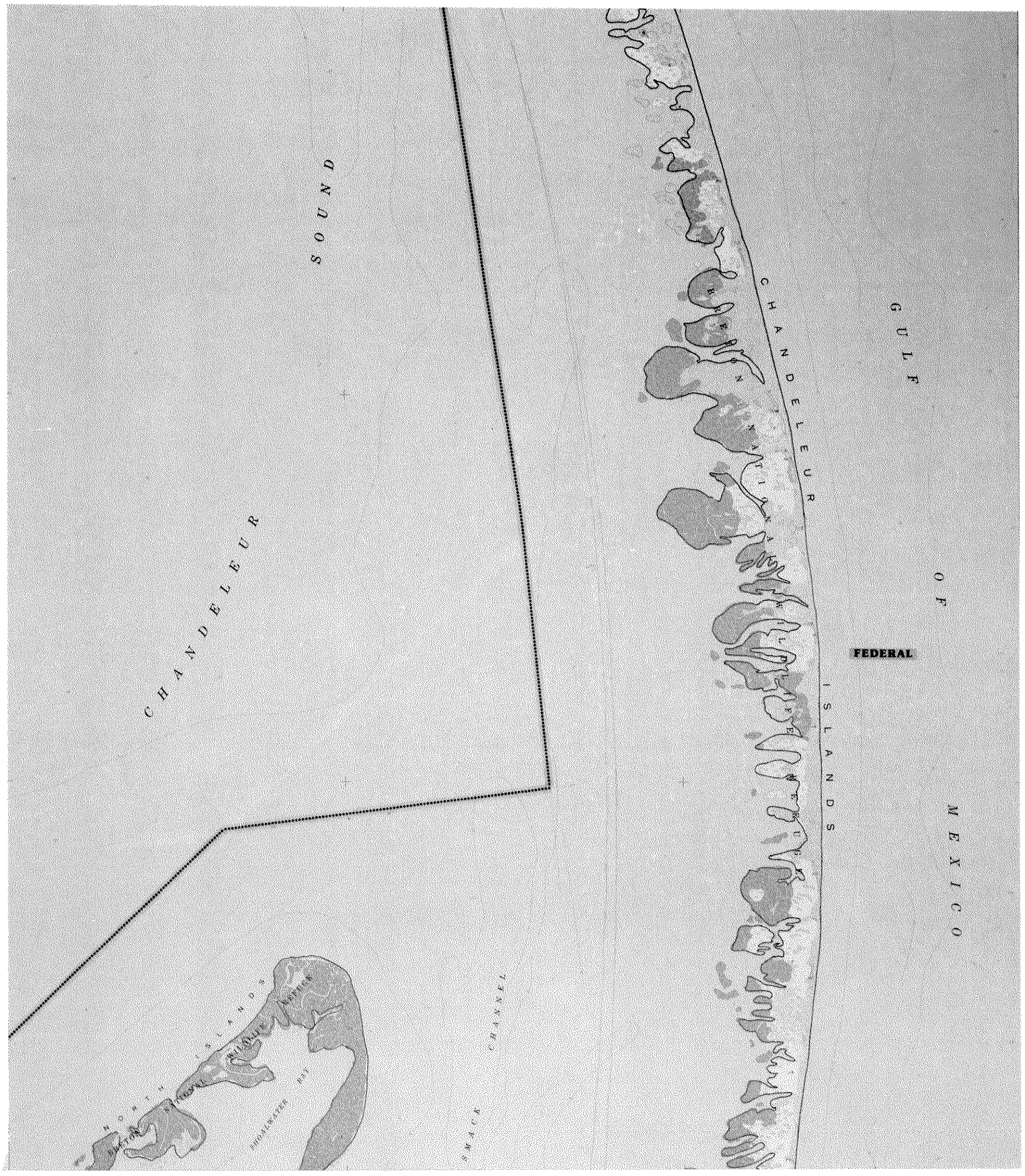
17



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QUADRANGLE
NORTH ISLANDS
LOUISIANA

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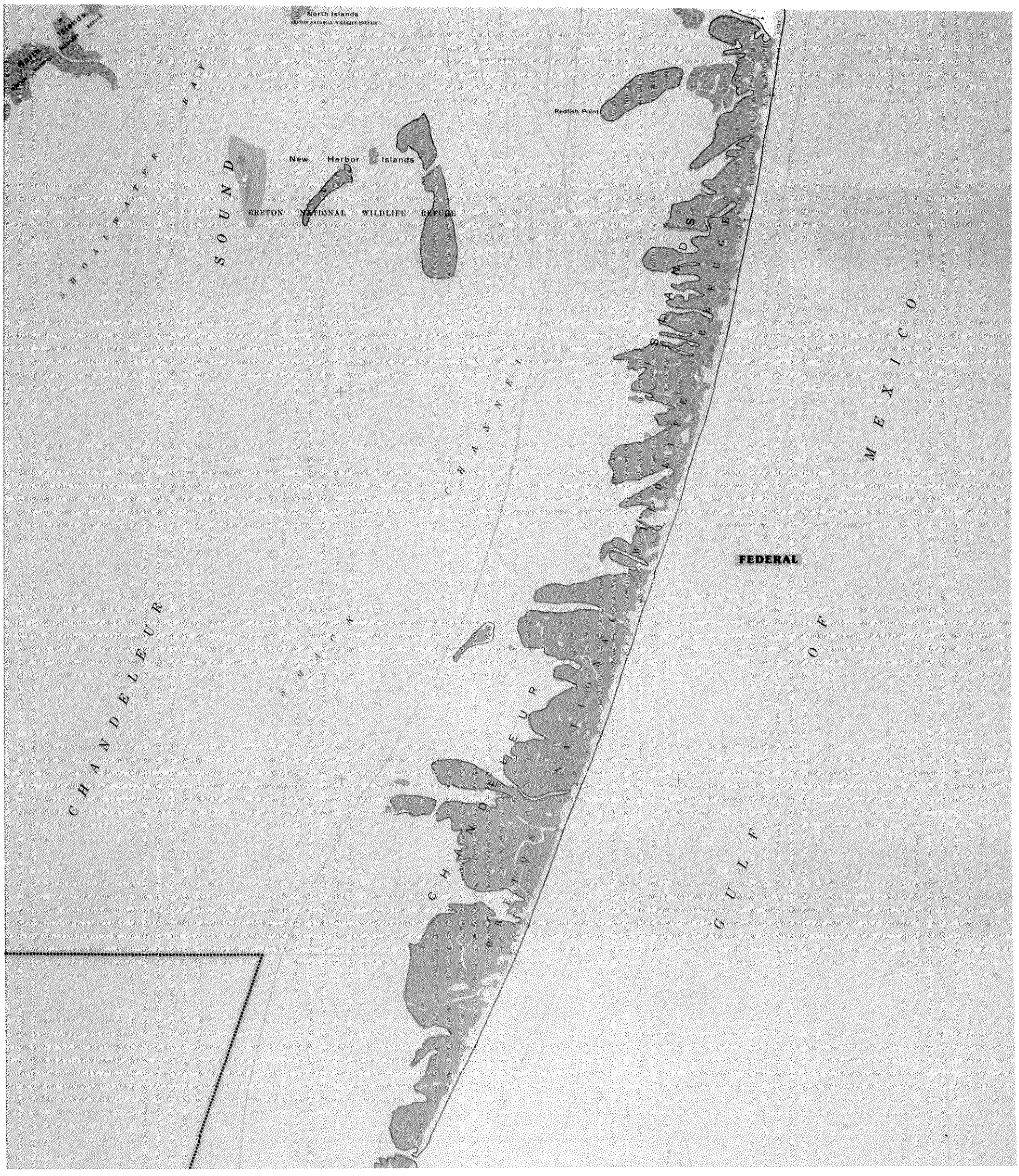

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QUADRANGLE

NEW HARBOR ISLANDS

LOUISIANA

SCALE

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19

North

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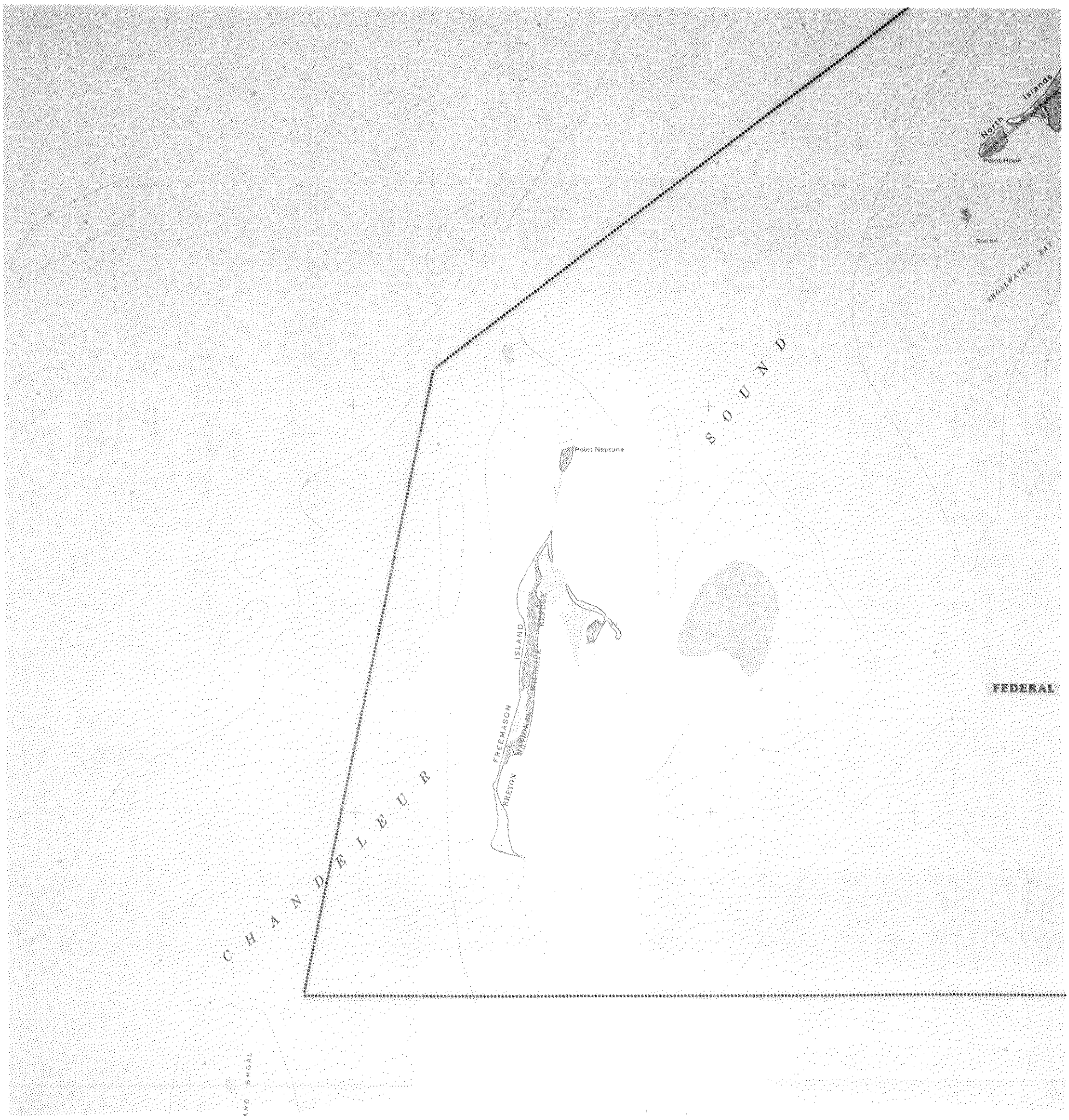

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QUADRANGLE

FREEMASON ISLAND

LOUISIANA

SCALE

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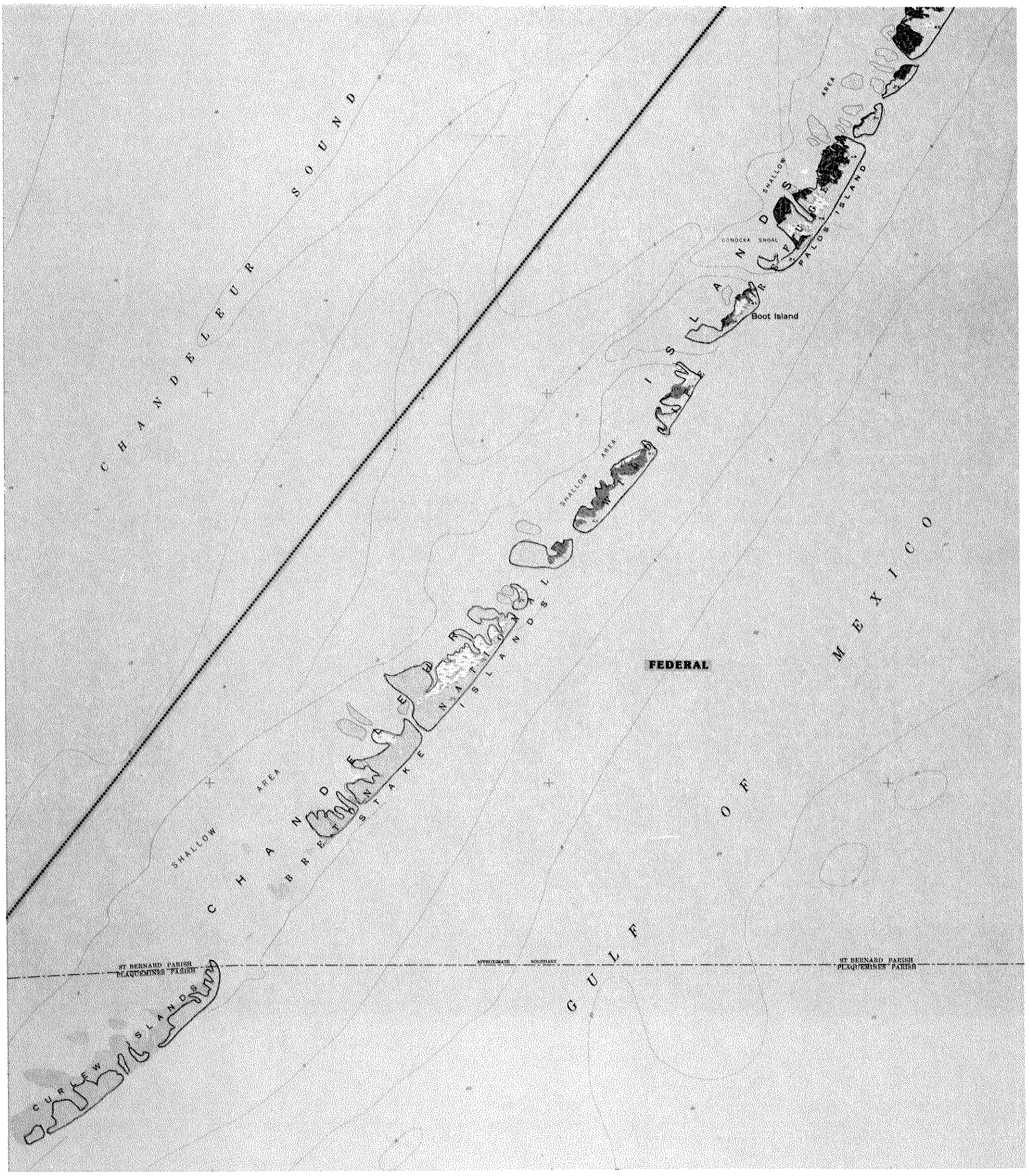
20



Report to Congress on the Coastal Barrier Resources System

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QUADRANGLE

STAKE ISLANDS

LOUISIANA

SCALE

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21

North

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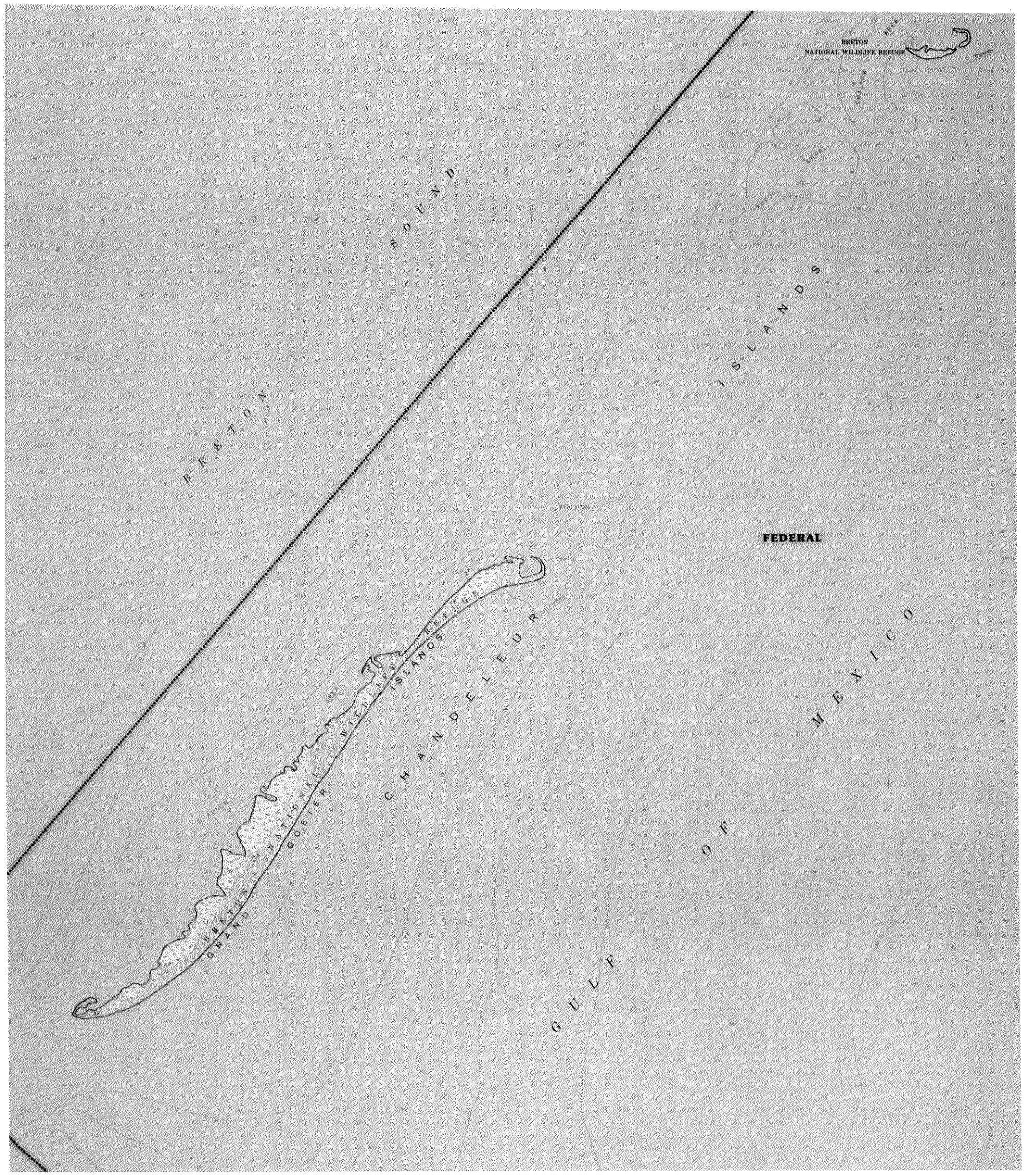

Report to Congress on the Coastal Barrier Resources System

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QUADRANGLE

GRAND GOSIER ISLAND

LOUISIANA

SCALE

1 1/2 0 1 MILE

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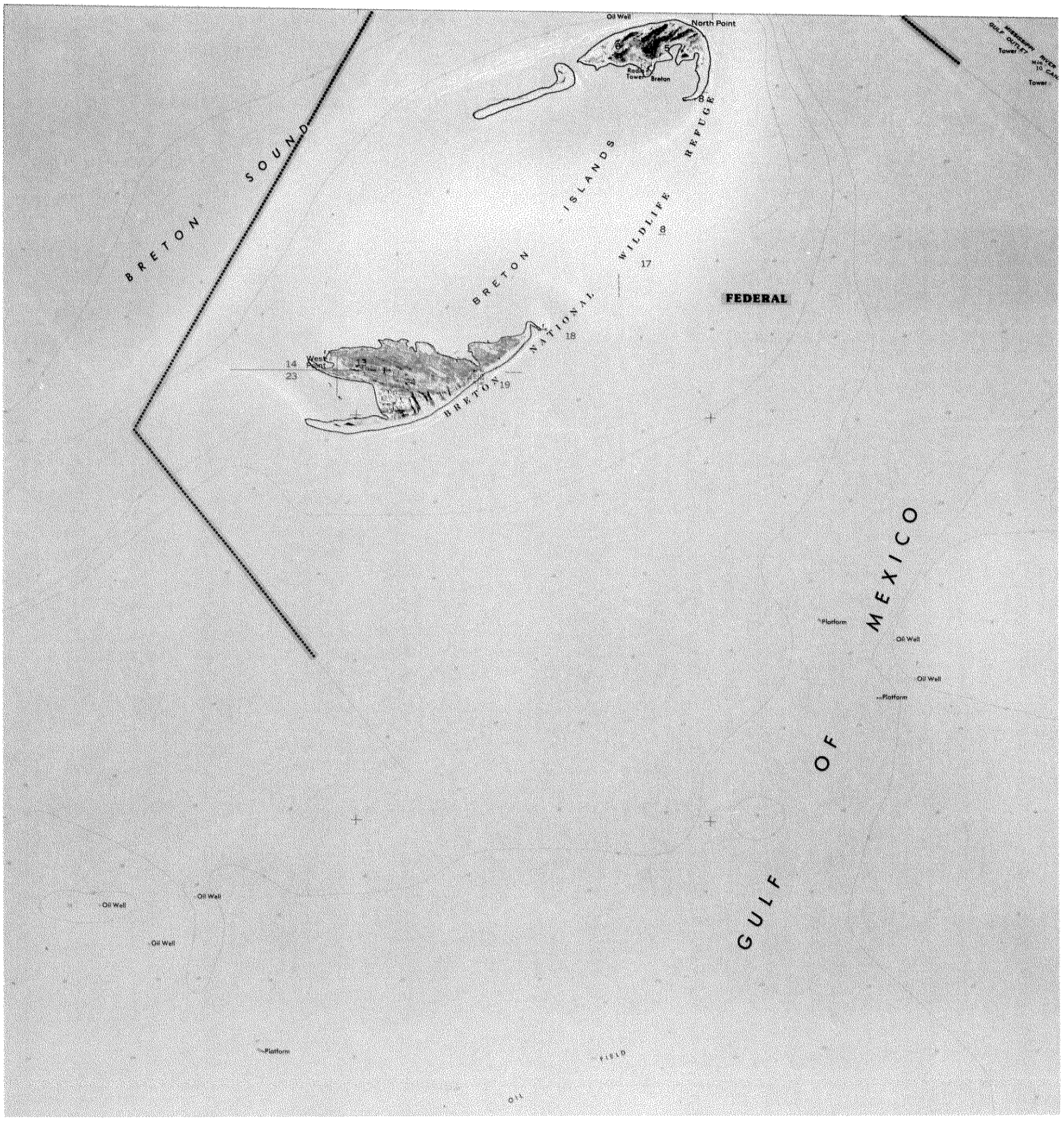
22



Report to Congress on the Coastal Barrier Resources System

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DEPARTMENT OF THE INTERIOR

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QUADRANGLE

BRETON ISLANDS

LOUISIANA

SCALE

1 1/2 0 1 MILE

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1 5 0 1 KILOMETER

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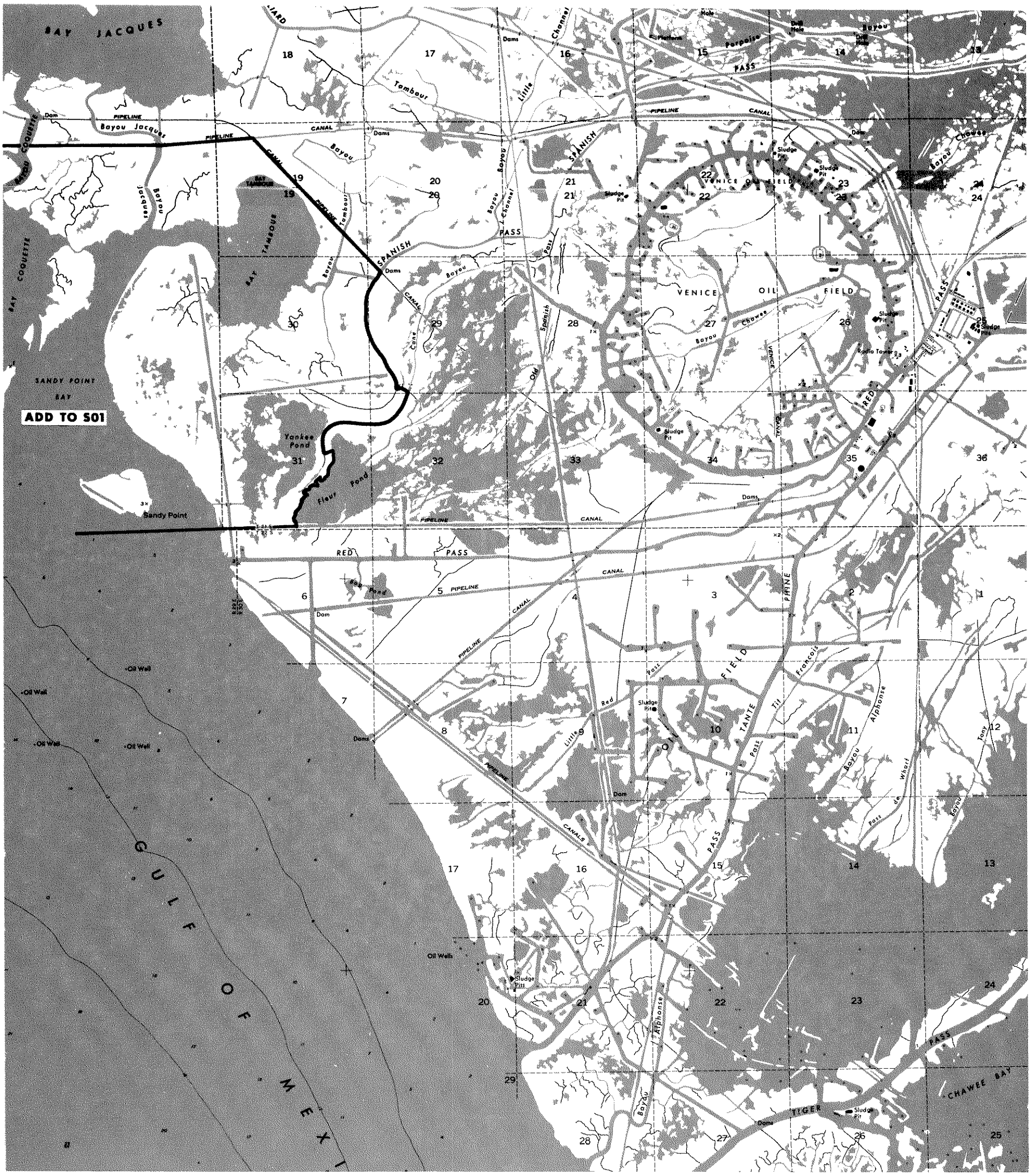

Report to Congress on the Coastal Barrier Resources System

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QUADRANGLE

PASS TANTE PHINE

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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North

Base Map is the U.S. Geological Survey 1:24,000 scale quadrangle.

24

Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR

QUADRANGLE

BURAS

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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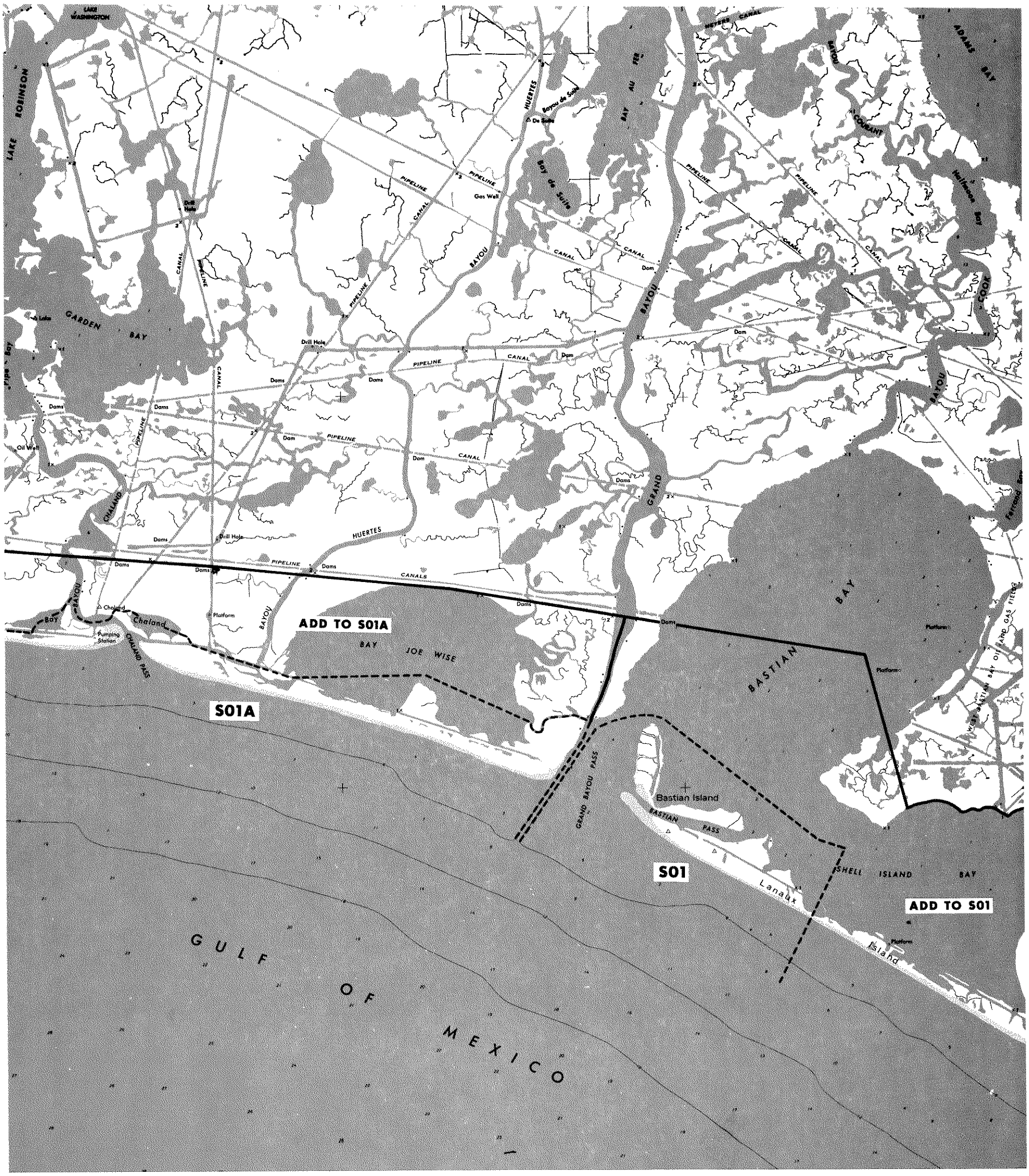

Report to Congress on the Coastal Barrier Resources System

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QUADRANGLE

BASTIAN BAY

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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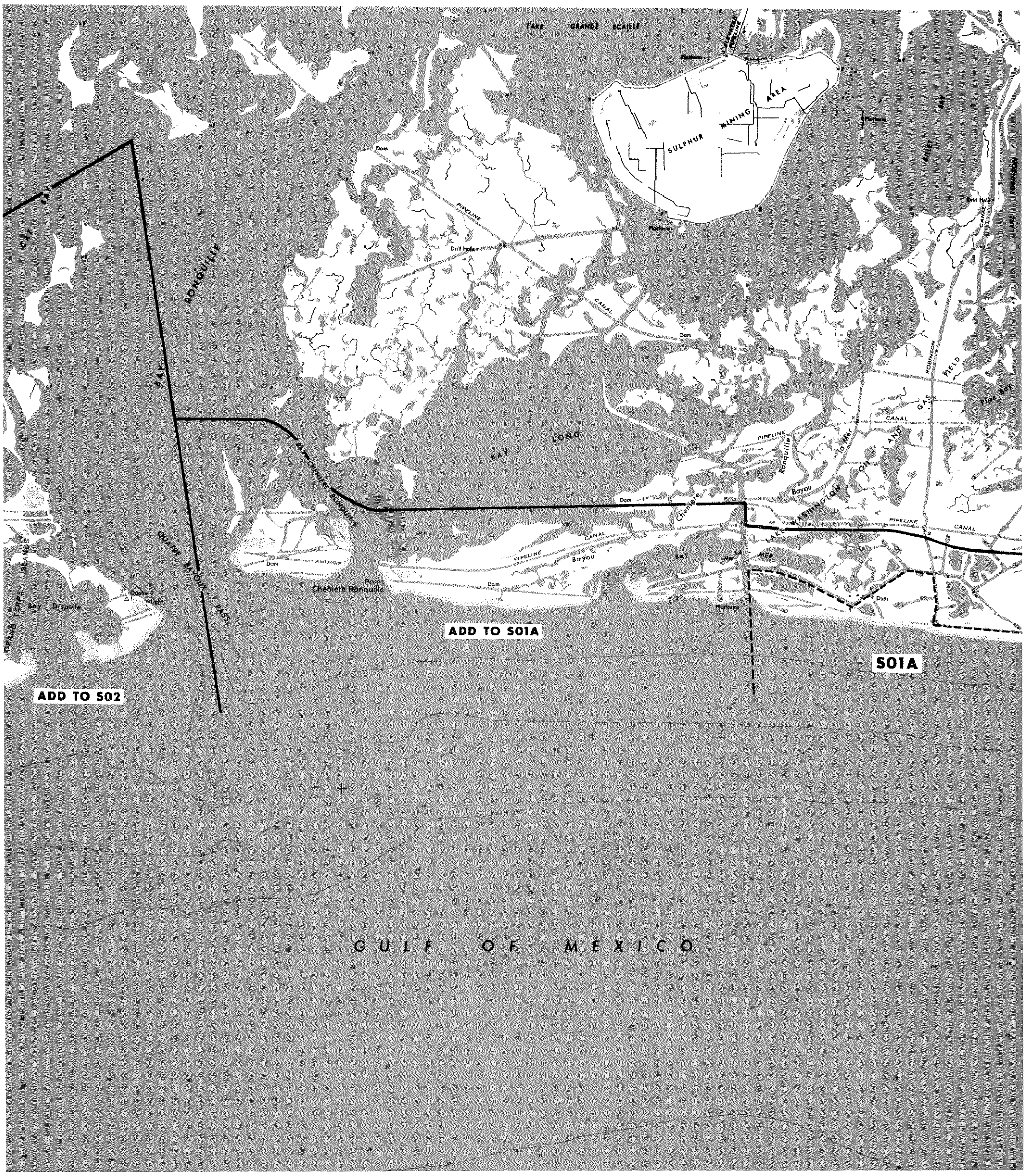
26

North

Base Map is the U.S. Geological Survey 1:24,000 scale quadrangle.



Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR

Mapped, edited and published
by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

QUADRANGLE

BAY RONQUILLE

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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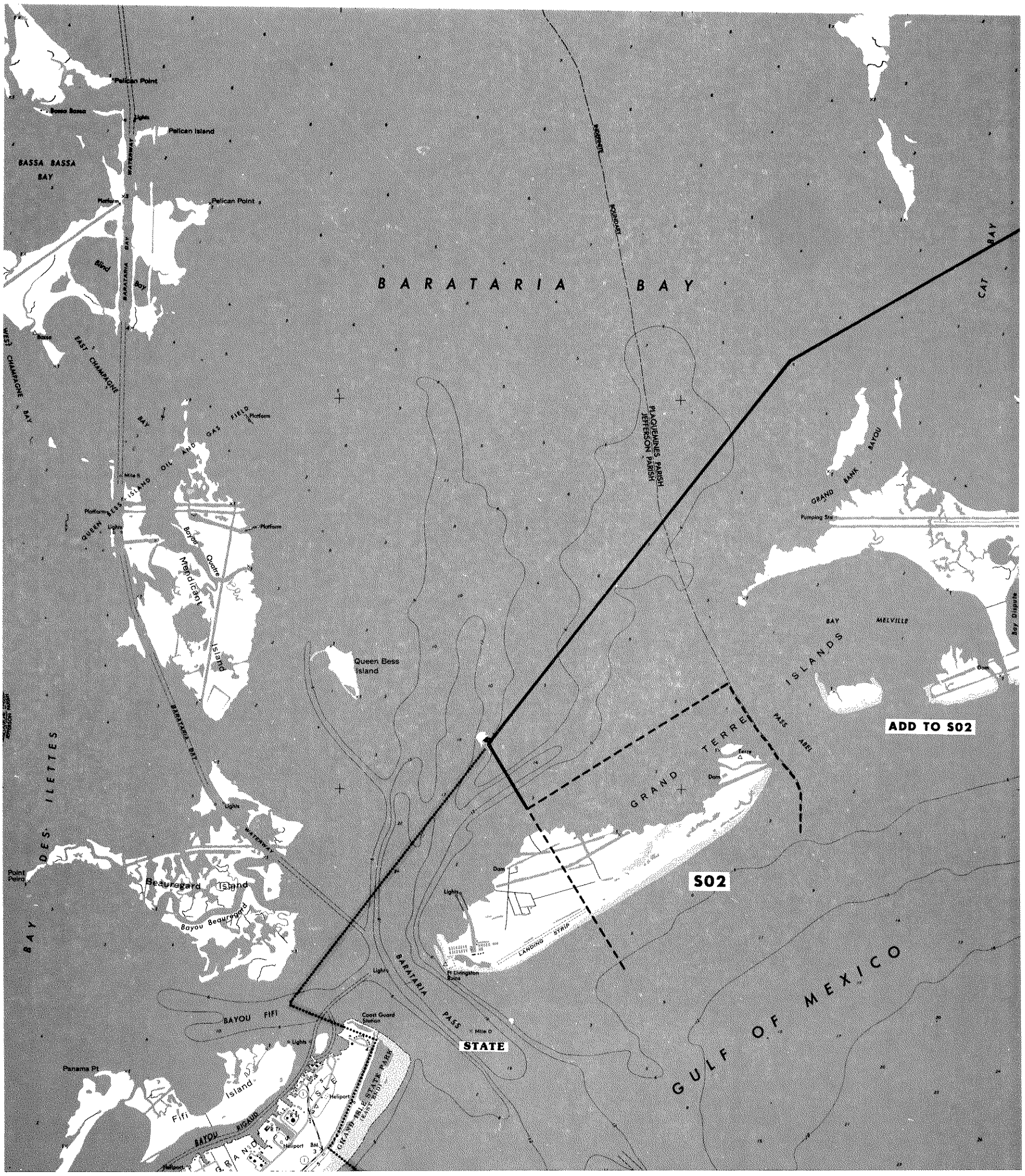

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UNITED STATES
DEPARTMENT OF THE INTERIOR

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QUADRANGLE

BARATARIA PASS

LOUISIANA

SCALE

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28

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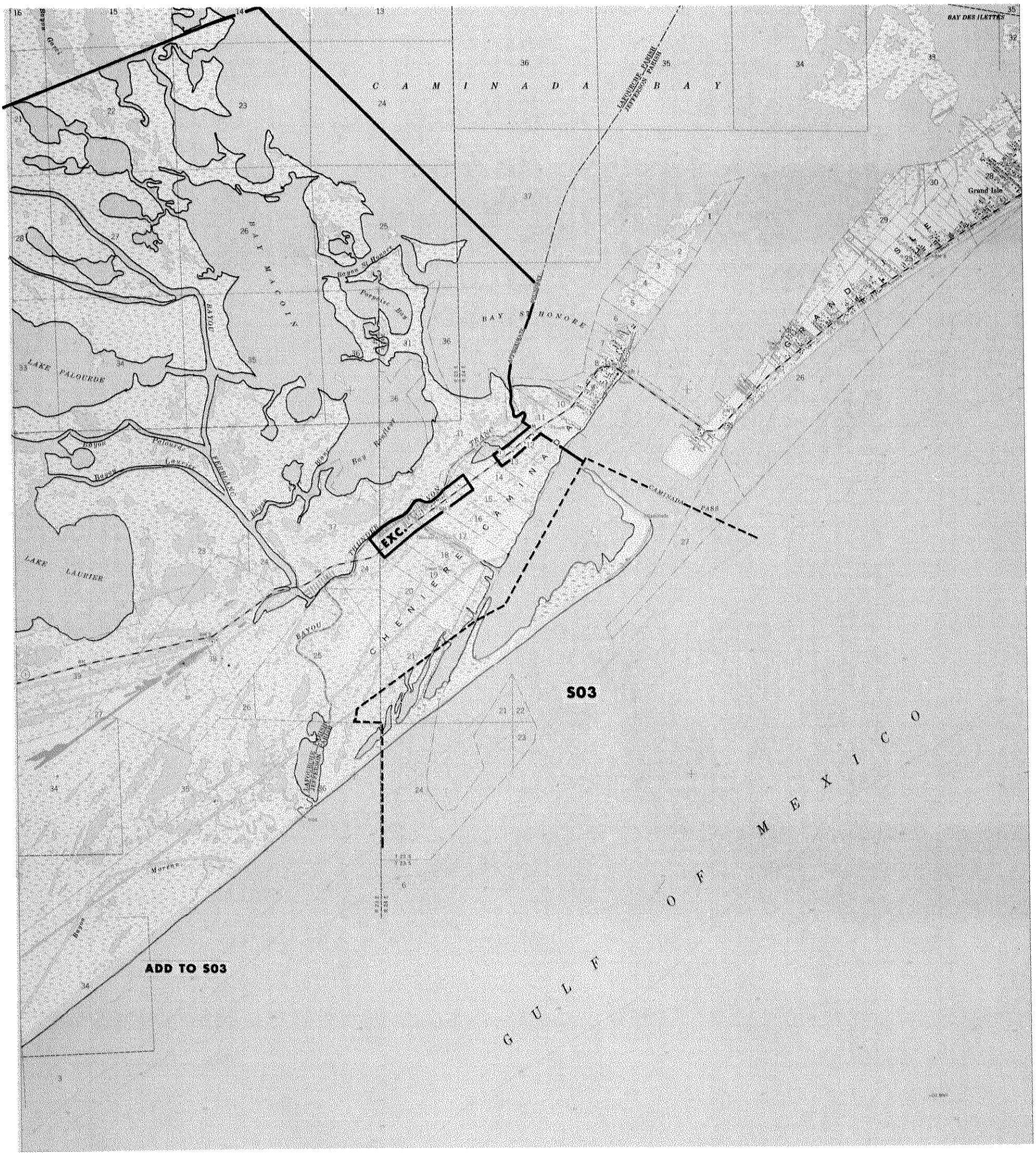

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UNITED STATES
DEPARTMENT OF THE INTERIOR

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QUADRANGLE

CAMINADA PASS

LOUISIANA

SCALE

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29

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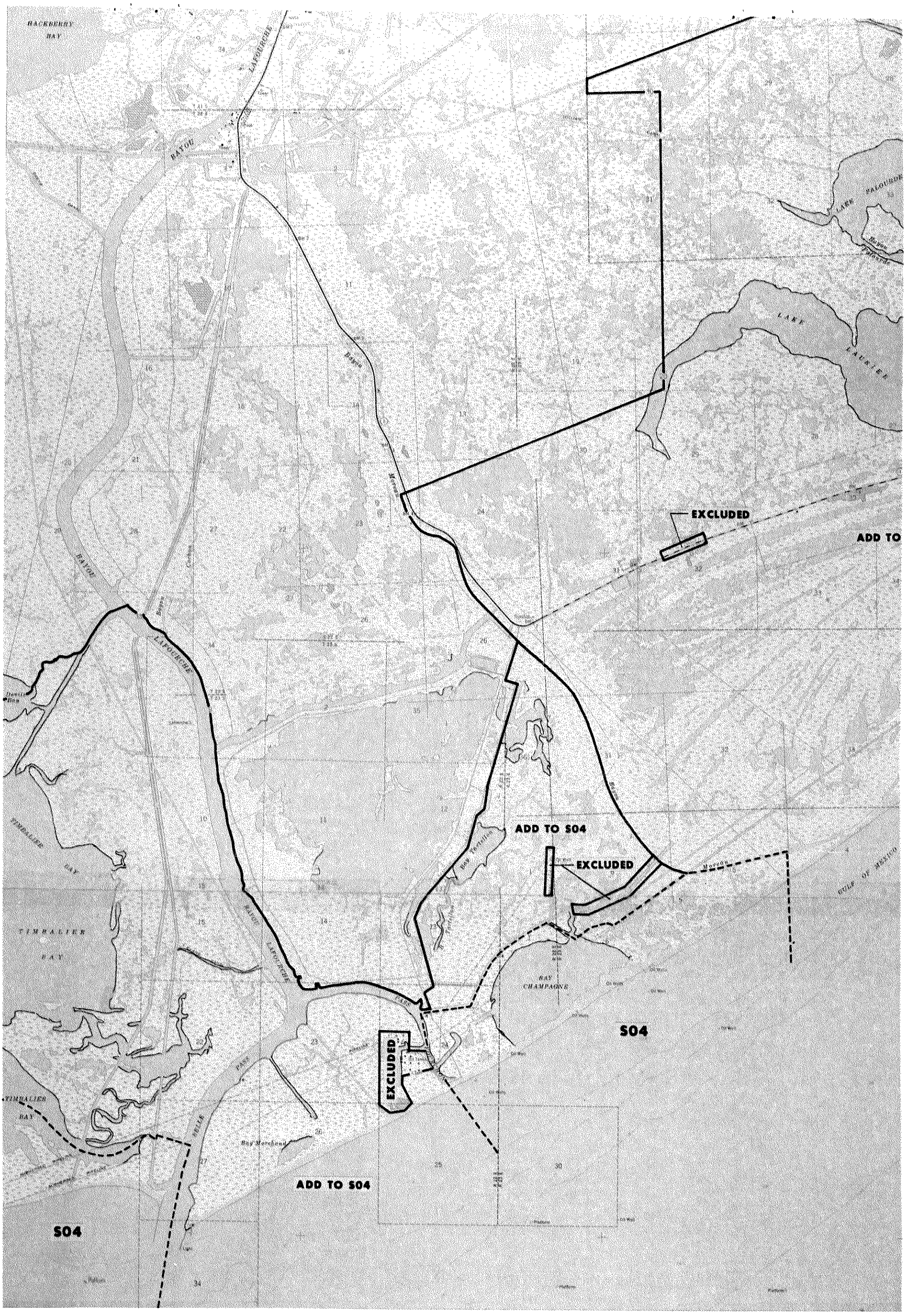

Report to Congress on the Coastal Barrier Resources System

UNITED STATES DEPARTMENT OF THE INTERIOR

Mapped, edited and published by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

QUADRANGLE

LEEVILLE

LOUISIANA

SCALE

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North

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S03 - CAMINADA

State Position: The State of Louisiana expressed no position on CBRS unit S03.

Other Comments: The City of New Orleans expressed concern that the addition of the new areas to S03 might interfere with shore protection projects around Port Fourchon. The New Orleans District of the Army Corps of Engineers expressed concern that the proposed landward boundary of S03 extended more than 5 miles inland. The Louisiana Shallow-Draft Ports and Waterways Commission refers to S03 in its comment letter; however, the land the Commission is concerned about is part of S04 and the comment is discussed there. The City's and the Corps' comment letters are reprinted below.

Response: All the areas recommended for addition to S03 are undeveloped and fully qualified under DOI criteria. There are no restrictions on shore protection projects in Louisiana CBRS unit S03. The DOI has carefully examined the proposed landward boundary of S03; it is approximately 5 miles inland and was delineated in full conformance with DOI criteria.

DOI Recommendation: The DOI recommends adding new barrier areas and associated aquatic habitat to the existing CBRS unit.

1757

DEPARTMENT OF THE ARMY
NEW ORLEANS DISTRICT, CORPS OF ENGINEERS
P.O. BOX 60267
NEW ORLEANS, LOUISIANA 70160-0267

REPLY TO ATTENTION OF

March 14, 1988

Planning Division
Environmental Analysis Branch

Mr. William P. Horn
Assistant Secretary for Fish, Wildlife and Parks
Office of the Secretary
U.S. Department of the Interior
Washington, D.C. 20240

Dear Mr. Horn:

We wish to comment on your "Draft Supplemental Legislative Environmental Impact Statement on Proposed Changes to the Coastal Barrier Resources System". Since we are not on your mailing list, we would appreciate receiving all future environmental documents, proposed regulations, and any information on CBRA within Louisiana.

General Comments:

1. We would like to point out that the Louisiana barrier island/wetland system does not fit the classic definition of such a system. Instead of having an island with a few hundred feet of wetlands behind it and then the mainland, we have islands with up to 40 miles of wetlands between them and "high ground". We are concerned that the landward boundary of the CBRA units is more than the legally mandated 5 miles inland in S03 and S07. The proposed additions also include several developed areas which should be excluded by your definitions: the S04 area protected by "boudin bags"; East Timbalier Island which is protected by rip-rap; and several developed areas in S10 such as Rutherford Beach, the Mud Lake area, and parts of the community of Johnson's Bayou.

2. The EIS should specifically discuss impacts in Louisiana, since approximately one third of the proposed additions are in that state. The rationale for such an inclusion is questionable since it appears that your future with and without the project are essentially the same in Louisiana. On page IV-8, you state that no-action impacts are likely to be greatest in the Sun Belt states i.e. that development will occur. Meanwhile, on the next page, you claim that the vast majority of wetland acreage in Louisiana proposed for inclusion is unsuitable for development.

Specific Comments:

Page IV-3 - The small clusters of houses on the cheniers cannot be realistically classified as "urban areas".

Page VI-13 - You state that, except for the cheniers, approximately 80% of the proposed additions are near established communities. This is not so for most of the 326,000 acres proposed for addition in Louisiana.

Sincerely,

Cletis R. Wagahoff
Chief, Planning Division

67

EDWARD WISNER DONATION ADVISORY COMMITTEE

RICHARD A. PENEGUY
SECRETARY
ROOM 8W48 CITY HALL, CIVIC CENTER
PHONE 586-4216

MAYOR OF NEW ORLEANS, TRUSTEE
NEW ORLEANS, LA. 70112

SERVING:
CHARITY HOSPITAL AT NEW ORLEANS
CITY OF NEW ORLEANS
THE SALVATION ARMY
TULANE UNIVERSITY

April 21, 1987

Coastal Barriers Study Group,
U. S. Department of the Interior,
National Park Service - 498,
P. O. Box 37127,
Washington, D. C. 20013-7127

RE: COASTAL BARRIERS RESOURCES SYSTEM

Gentlemen:

This is written as a comment on the proposed inclusion of lands in the lower Lafourche Parish, Lousiana area. We attach a copy of a map showing the outline, in red, of some lands owned by the City of New Orleans, which also indicate inclusion of portions of our lands which apparently have no value for the propagation of marine and/or wildlife, but which is needed in order to continue the development of an important Industrial Park and Port Area for the benefit of local interests.

The lower portion of this tract (between the forks of Bayou Lafourche) currently serves as a buffer for protection of the Port's Park, and has a value for added development for port-related facilities. This tract has been protected by the Greater Lafourche Port Commission/State of Louisiana, by placement of sandbags and beach nourishment in recent months. The Port Director has informed us that this system is apparently working to stem erosion of this tract. In addition, the jetty system on Bayou Lafourche has been working to re-generate lands in the area for some years, now.

the upper Portion (Park Area) is in the process of being developed from 1960 to the present. This area is encircled by a ring levee, which, for all practical purposes, has condemned the area for any other purpose. While your proposals show the exclusion of portions of this tract, we suggest that the entirety of the area should be eliminated from those proposals.

Our other lands indicated on the map, as "Add To 503 and Add To 504" are highly-productive of marine life, and must be protected from the ravages of the Gulf of Mexico and from saltwater intrusion. If this is accomplished, and we submit that it can be, we hope to thereafter prove the value of Mariculture from this area, for the benefit of the Nation and local economies.

While on this subject, the City also owns significant additional lands in the Leeville Quadrangle, located between the Southeastern Louisiana Canal and Louisiana Highway 1, which may also be subject to inclusion in your proposals.

Coastal Barriers Study Group,
April 21, 1987
Page 2.

This area is located in Townships 21 and 22 South, Ranges 22 and 23 East. Since we have seen no maps indicating the inclusion/exclusion of these properties, we may or may not have further comments until we review those maps. In the meantime, we advise you that the Louisiana Department of Wildlife and Fisheries has a long-term Game Management Area Lease on these properties, and there are no plans to develop them.

If we can furnish any other information on this subject, please advise.

Sincerely,

Richard A. Peneguy

RAP:rp
Encl.
Copies: Honorable John Breaux, Senator
Honorable W. J. Tauzin, Congressman
Mr. Ted Falgout, Director, GLPC
Honorable Bobby Tardo, Lafourche Parish Council
Mr. Ed Pike, Lafourche C M Commission

P. S. We have a Marsh Management Plan in hand, prepared by Coastal Environments, Inc., of Baton Rouge, covering the "503 Area", outlined in green on the attached map.

1564

BILLY TAUZIN
THIRD DISTRICT, LOUISIANA

ENERGY AND COMMERCE COMMITTEE
MERCHANT MARINE AND FISHERIES COMMITTEE

WASHINGTON OFFICE
TELEPHONE 202-225-4031
222 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515

ADMINISTRATIVE ASSISTANT
ROY W. WILLIS

DISTRICT OFFICES

TELEPHONE 504-876-3501
2439 MANSTAN BLVD.
SUITE 304
HARVEY, LA 70058

TELEPHONE 504-876-3501
FEDERAL BUILDING, ROOM 102
HOUMA, LA 70360

TELEPHONE 318-367-9231
210 EAST MAIN STREET
NEW IBERIA, LA 70560

Congress of the United States
House of Representatives
Washington, DC 20515

June 11, 1987

Honorable Donald Hodel
Secretary
U. S. Department of the Interior
C Street Between 18th and 19th Street, N.W.
Washington, D.C. 20240

Dear Don:

Enclosed please find a copy of a letter I have received from Mr. Richard A. Peneguy expressing concern over the inclusion of certain areas of coastal Louisiana in the Coastal Barriers Resources System. These same concerns have been expressed by Mr. Ted Falgout, Executive Director of the Greater Lafourche Port Commission.

Please know that I share their concern. Port Fourcheon is vital to the continued development of our offshore oil and gas reserves in the central Gulf of Mexico: it provides safe haven for hundreds of fishing boats harvesting the nations most productive fishing grounds: and, it is the homeport of our nations only deepwater offshore oilport. I strongly feel that inclusion of these new areas will threaten the continued success of Port Fourcheon in meeting our nations vital needs.

Additionally, inclusion of these areas will surely affect the stability of the rapidly eroding marsh which is a greater threat to Louisiana's wetlands than development. Don, it will take federal funds and participation to protect these wetlands. Including them in the system could do more harm than good.

Your favorable consideration of Mr. Peneguy's request that these areas be eliminated would be personally appreciated.

With warmest regards, I remain

Very truly yours,

Billy

BILLY TAUZIN
Member of Congress

BT:cm

Enclosure

S04 - BAY CHAMPAGNE

State Position: The State of Louisiana endorsed the Louisiana Shallow-Draft Ports and Waterways Commission position discussed below which opposes the addition of the ring leveed area and the western portion of Bay Morehand Island to the existing CBRS unit.

Other Comments: The Louisiana Shallow-Draft Ports and Waterways Commission, the City of New Orleans, and the Greater Lafourche Port Commission all oppose the addition of a modified wetland area within a ring levee northwest of Bay Tartellon and the western portion of Bay Morehand Island to the CBRS unit. The commenters are concerned about the impacts of the additions on future expansion of Port Fourchon and on beach stabilization and spoil disposal activities. The two port commission letters are reprinted below. The City of New Orleans' letter is reprinted under S03 (letter number 67).

The New Orleans District of the Army Corps of Engineers suggested that parts of S04 should be considered developed because they are protected by boudin bags and rip-rap. The Corps' letter is reprinted under S03 (letter number 1757).

Response: The wetlands within the ring levee are substantially altered and the DOI agrees that they do not qualify for addition to the CBRS. Bay Morehand Island, with the exception of a tank farm area that has been excluded, is undeveloped and fully qualifies for addition to the CBRS under DOI criteria. Beach stabilization is not restricted in S04 (see Section 5(a)(3) of the CBRA). Spoil disposal in the CBRS is an allowable exception from the restrictions on Federal funding under Section 6 of the CBRA.

DOI Recommendation: The DOI recommends adding new barrier areas and associated aquatic habitat to S04. The recommended boundaries of S04 have been modified from those proposed in the 1987 Draft Report to exclude the area within and to the north of the ring levee.

525

May 22, 1987

Coastal Barriers Study Group
U. S. Department of the Interior
National Park Service - 498
P. O. Box 37127
Washington, D. C. 20013-7127

Dear Coastal Barriers Study Group:

I have reviewed your proposed recommendations for additions to the Coastal Barrier Resource System and have comments on Lafourche Parish and more specifically, the Port Fourchon area.

Port Fourchon is a rapidly growing fishing, oil and shipping port located in the area proposed for inclusion into S04. This area was initially excluded from the CBRS because of its rapid growth and significance as the land base for this nation's only offshore oil port. Since that time, Port Fourchon has also gained notoriety as a shipping port with particular appeal for developing Carribean Basin trade.

The boundaries of the Port are well defined by spoil areas, roadways, canals and levees (area outlined in red, Exhibit A). This entire area is essential to port development and has been designated as the Port since the 1960's. This area should definitely not be added to the Coastal Barrier Resources System.

Exhibit B indicates the area of development, spoil areas and beach stabilization projects at the Port.

Please do not hesitate to contact me should you have any questions or need additional information.

Yours very truly,

Ted M. Falgout
Executive Director

TMF:lou
cc: United States Congressional Delegation
Louisiana Congressional Delegation

Greater Lafourche Port Commission • P.O. Drawer 490 • Galliano, La. 70354 • (504) 632-6701

887

LOUISIANA SHALLOW-DRAFT PORTS AND WATERWAYS COMMISSION
DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT
BATON ROUGE, LOUISIANA

June 15, 1987

Coastal Barriers Study Group
U.S. Department of the Interior
National Park Service - 498
P. O. Box 37127
Washington, D.C. 20013-7127

Ladies and Gentlemen:

We have reviewed your Report to Congress: Coastal Barriers Resources System.

At our regular meeting on May 27, 1987, we unanimously adopted the enclosed resolution in which we express our concerns over your recommendations on three coastal barriers units along Louisiana's Coast.

We ask that you give consideration to our comments when you make your final recommendations to Congress.

Should you desire any additional information, you may contact me at (318) 828-3410 or Vernon Behrhorst at the Ports and Waterways Institute at Louisiana State University, (504) 388-2774.

Sincerely yours,

Gary P. LaGrange
Chairman

Enclosure

cc: Shallow-Draft Ports and
Waterways Commission
Vernon Behrhorst

GPL/wlm

Mailing Address: Ports and Waterways Institute, Louisiana State University,
60 University Lakeshore Drive, Baton Rouge, LA 70803-7513
Telephone: 504/388-2772 or 388-2774

R E S O L U T I O N

WHEREAS, Louisiana's coastal ports and waterways are essential for commerce of our nation; mineral exploration and production, both onshore and on the continental shelf; and for commercial and recreational fishing, and

WHEREAS, the U.S. Department of Interior is required to submit its recommendations to Congress on additions to and deletions from the Coastal Barriers Resources System established by the Coastal Barriers Resources Act of 1982 (16 USC 3501 et seq), has issued a notice of its submission of its recommendations to Congress in the Federal Register, March 25, 1987, and has requested comments on these recommendations, and

WHEREAS, the Louisiana Shallow-Draft Ports and Waterways Commission has as one of its responsibilities, "to monitor federal . . . actions with regard to their possible effects upon Louisiana ports and waterways interest . . ."

NOW THEREFORE BE IT RESOLVED, by the Louisiana Shallow-Draft Ports and Waterways Commission that the Secretary of the Interior review his recommendations with regard to their effect upon coastal shallow-draft ports and waterways of Louisiana and consider modifying them, especially with respect to

1. Addition to unit S03 as shown on map 21, which if approved by Congress, would include already developed areas of Port Fourchon and areas already designated for use in the Port's Master Development Plan.
2. Addition to unit S07 which would incorporate all of Atchafalaya Bay that constitutes the Atchafalaya Delta Game Management Area under the administration of the Louisiana Department of Wildlife and Fisheries (maps 30-35) and as such is excluded from the definition of "undeveloped coastal Barrier" by Section 3(1) (B) of the Act.
3. Establishment of a new CBRS unit (LA-07) shown on map 37 which includes recently established waterway facilities on the east bank of Freshwater Bayou Canal, at Freshwater Bayou Lock,

and be it further

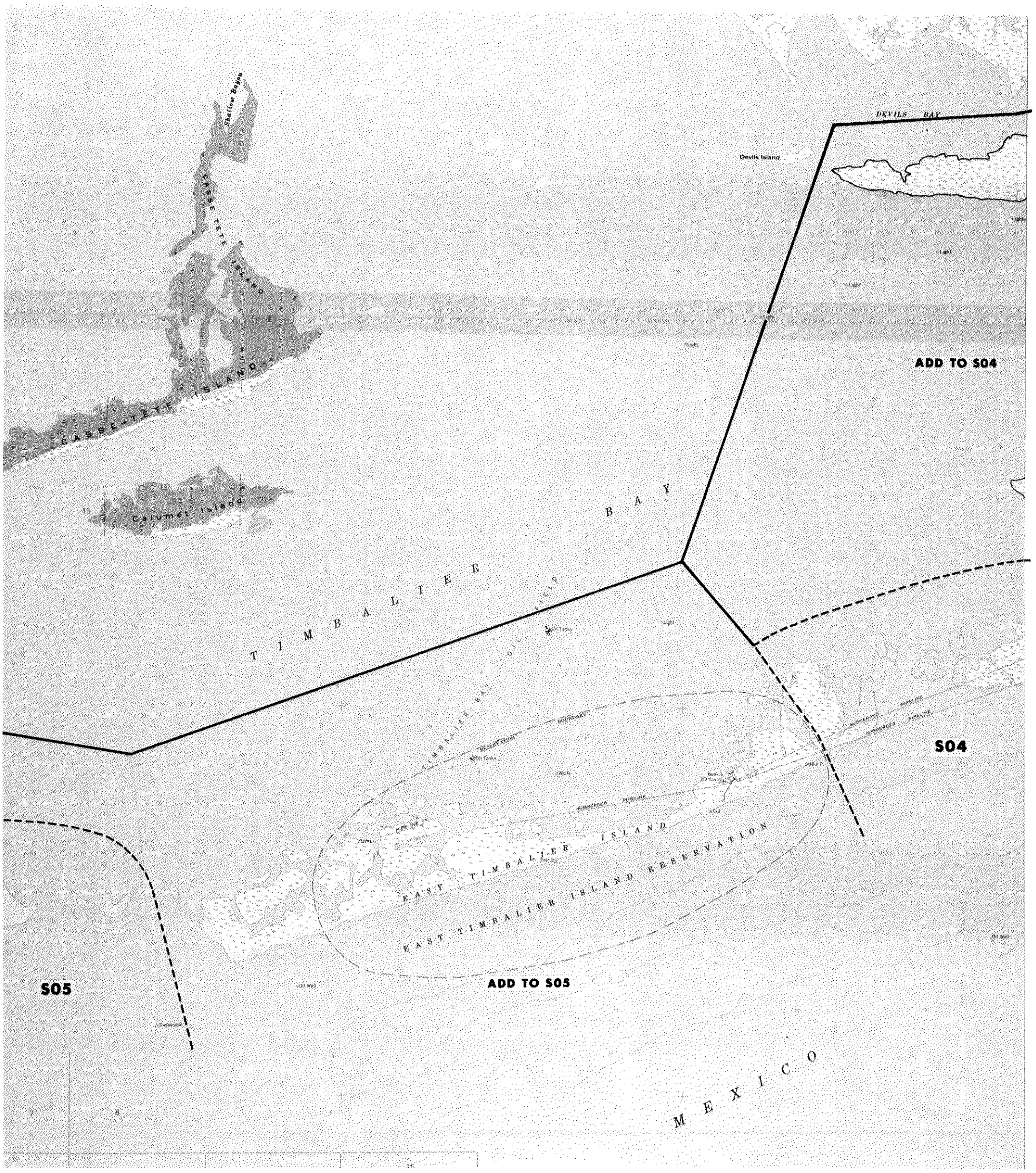
RESOLVED, that copies of this resolution be sent to the Governor of Louisiana, members of the Louisiana Congressional delegation and affected coastal port and waterways interests for their information and action, and be it further

RESOLVED, that the Louisiana Shallow-Draft Ports and Waterways Commission offers its full cooperation and assistance to the Department of the Interior, the Louisiana Congressional delegation, Louisiana state agencies and affected coastal ports and waterways interests in addressing these concerns.

Unanimously adopted May 27, 1987, at Port Manchac, Louisiana.

Randy Walters

Randy Walters, Secretary



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DEPARTMENT OF THE INTERIOR

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Washington, D.C. 20240

QUADRANGLE

CALUMET ISLAND

LOUISIANA

SCALE

1 1/2 0 1 MILE

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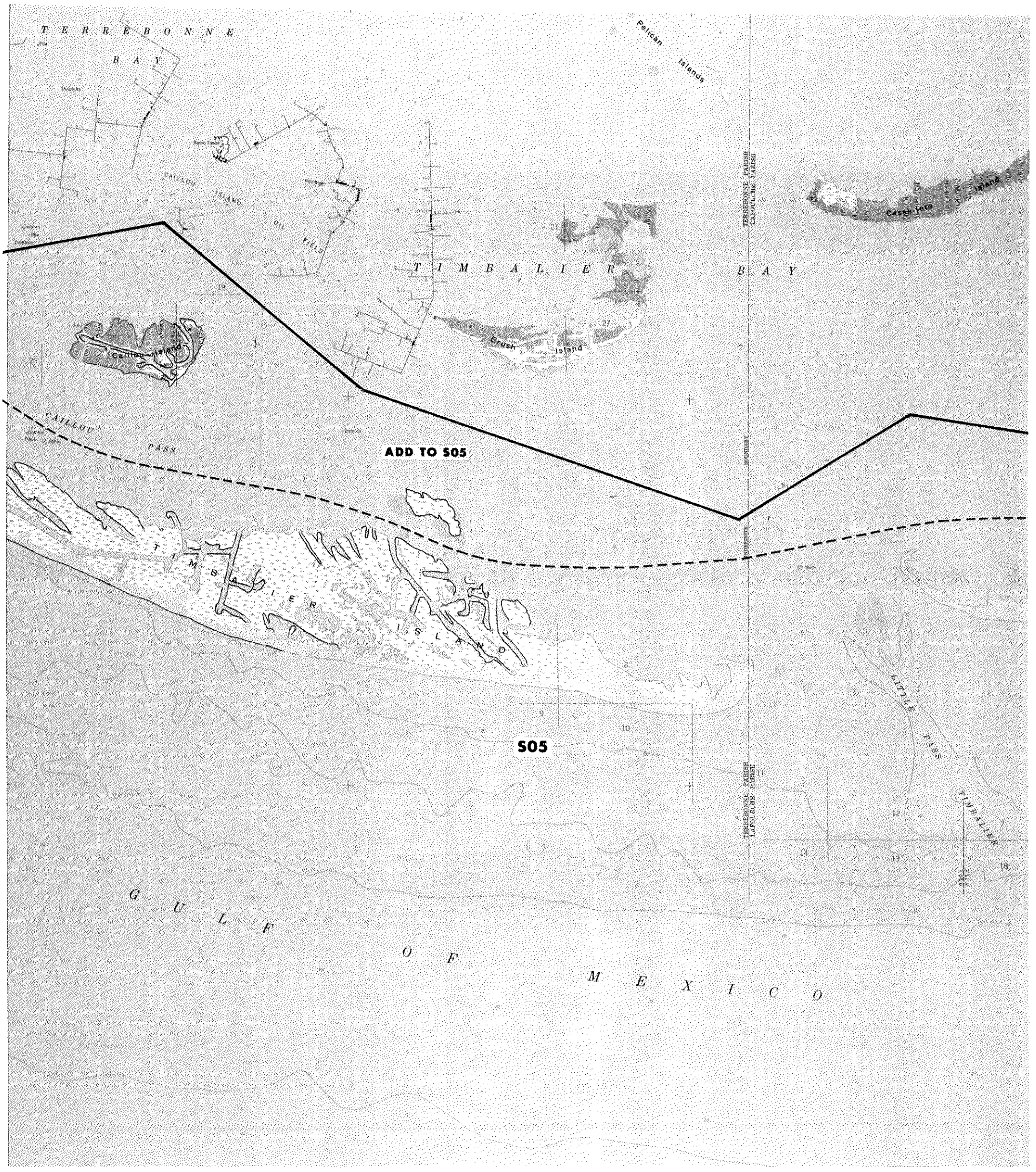

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QUADRANGLE

TIMBALIER ISLAND

LOUISIANA

SCALE

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1 5 0 1 KILOMETER

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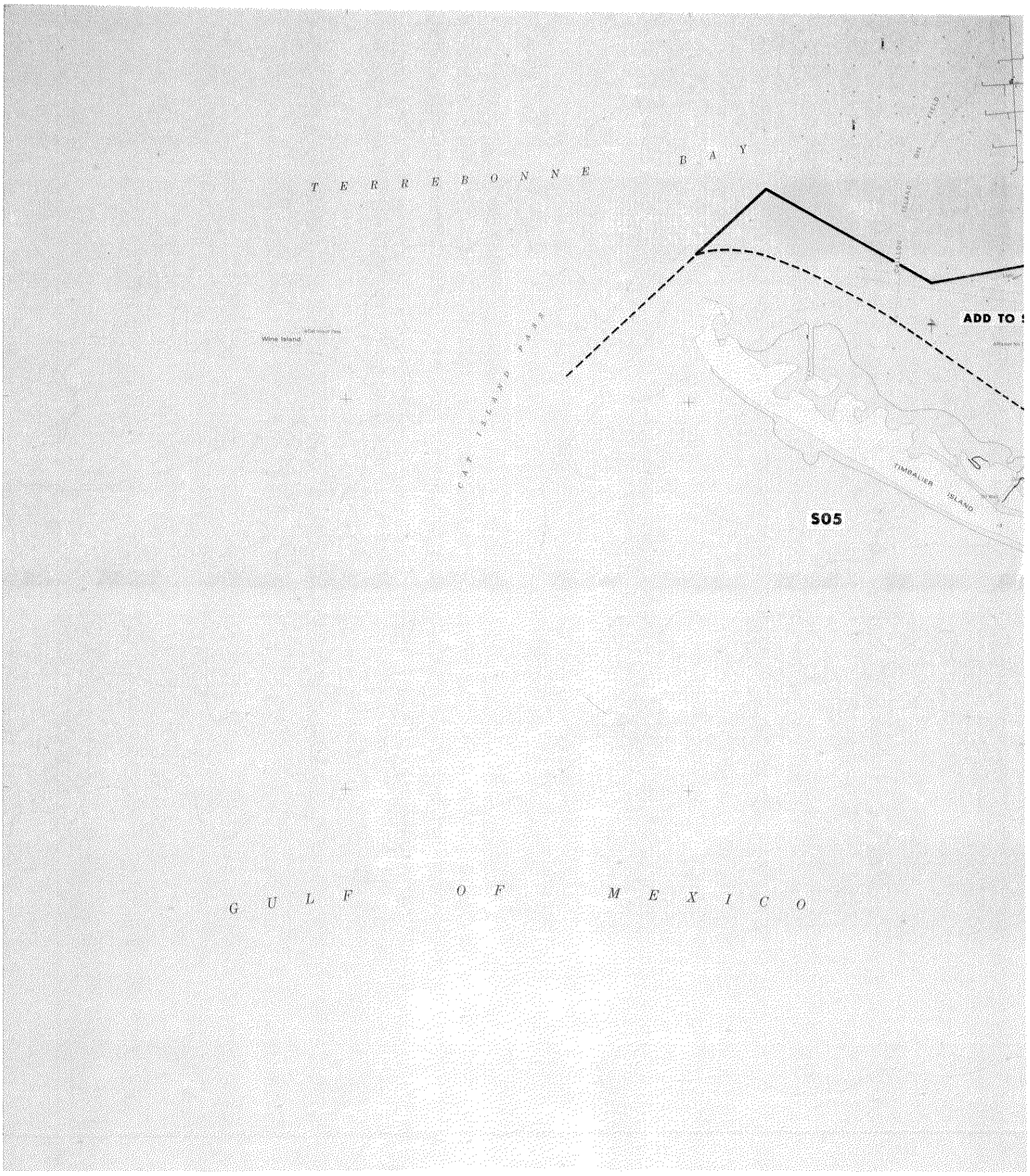

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DEPARTMENT OF THE INTERIOR

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QUADRANGLE

CAT ISLAND PASS

LOUISIANA

SCALE

1 1/2 0 1 MILE

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1 5 0 1 KILOMETER

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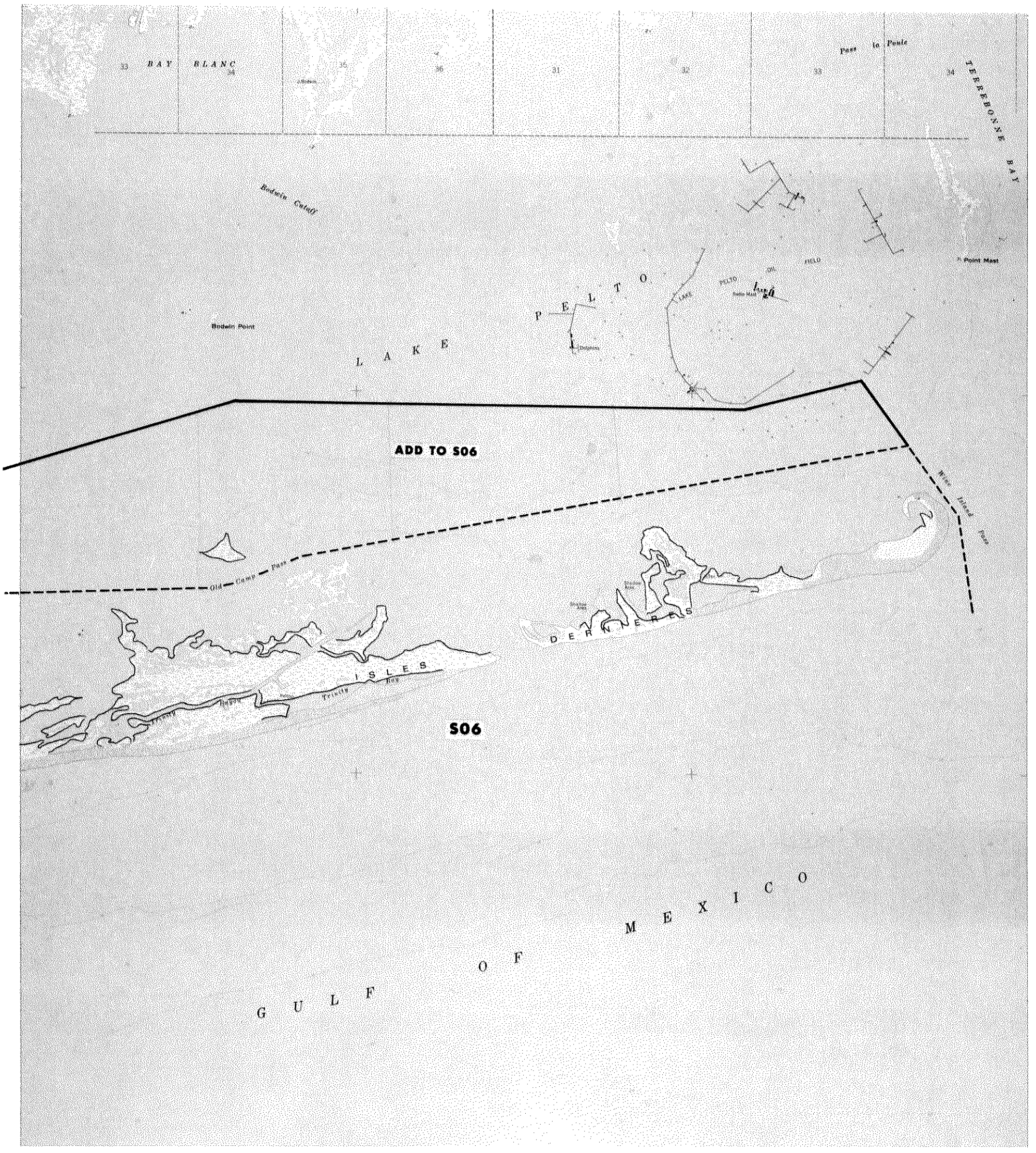

Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR

QUADRANGLE

EASTERN ISLES DERNIERES

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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U.S. Department of the Interior
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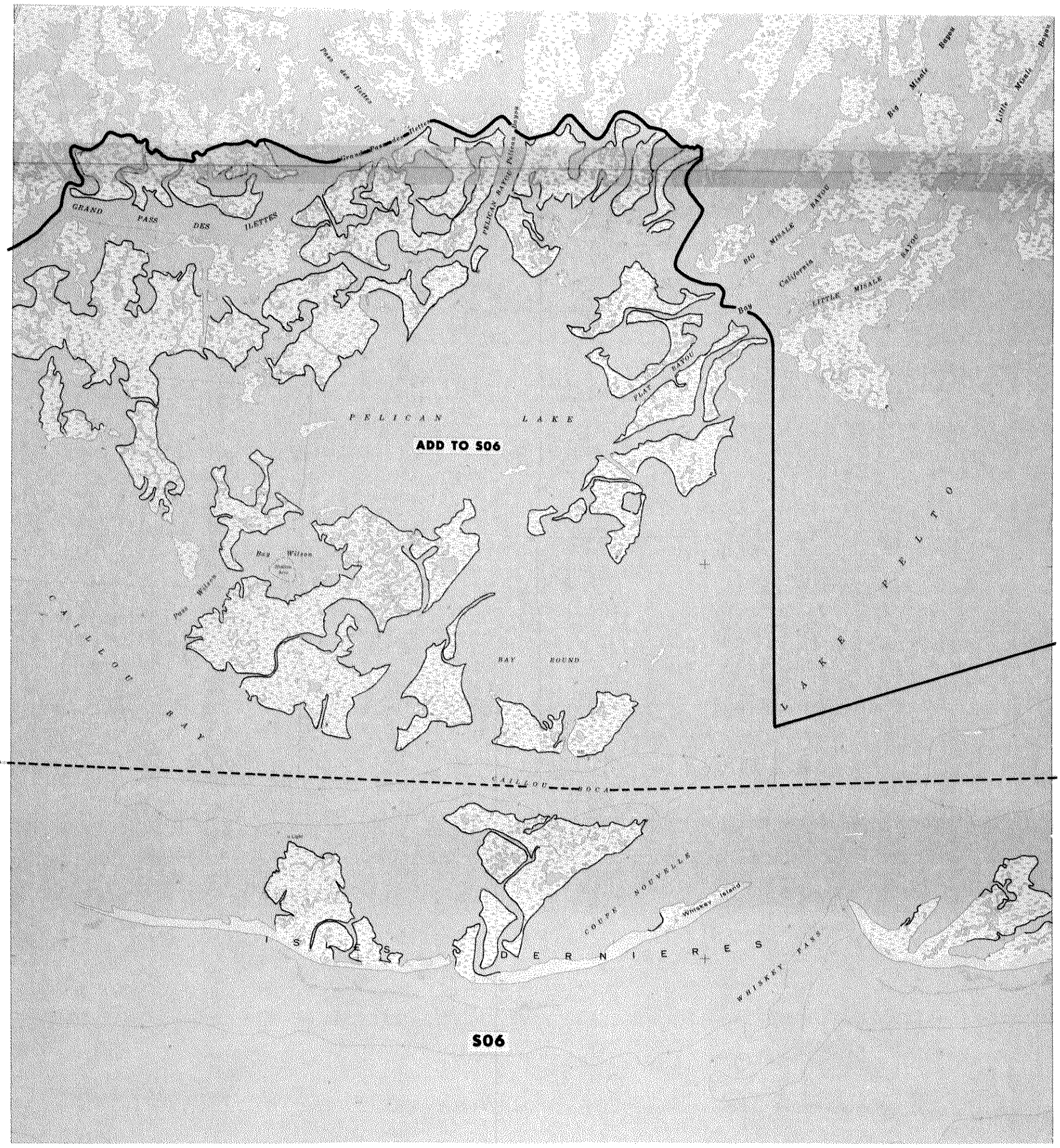

S06

Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR

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Washington, D.C. 20240

QUADRANGLE

CENTRAL ISLES DERNIERES

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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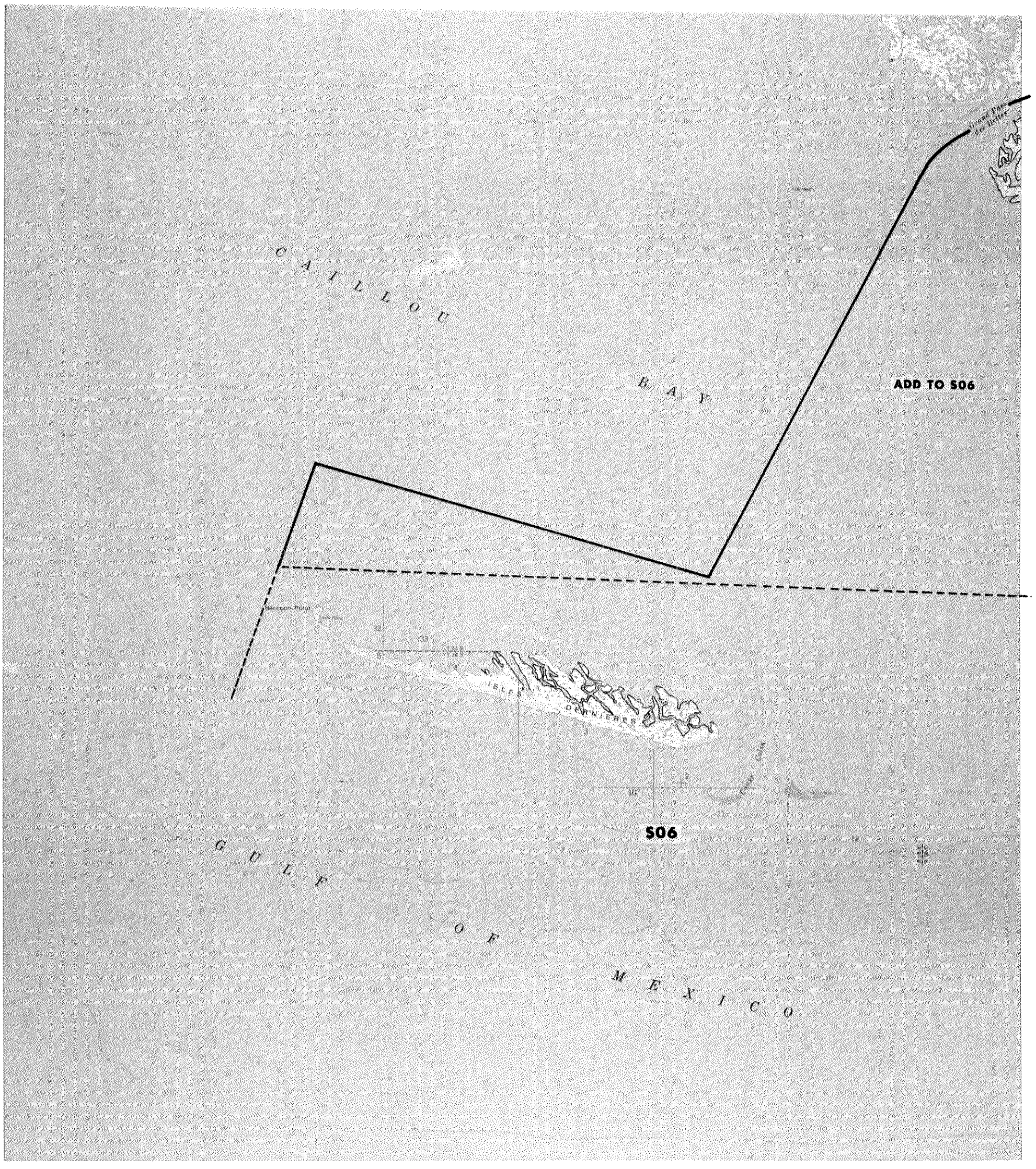

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QUADRANGLE

WESTERN ISLES DERNIERES

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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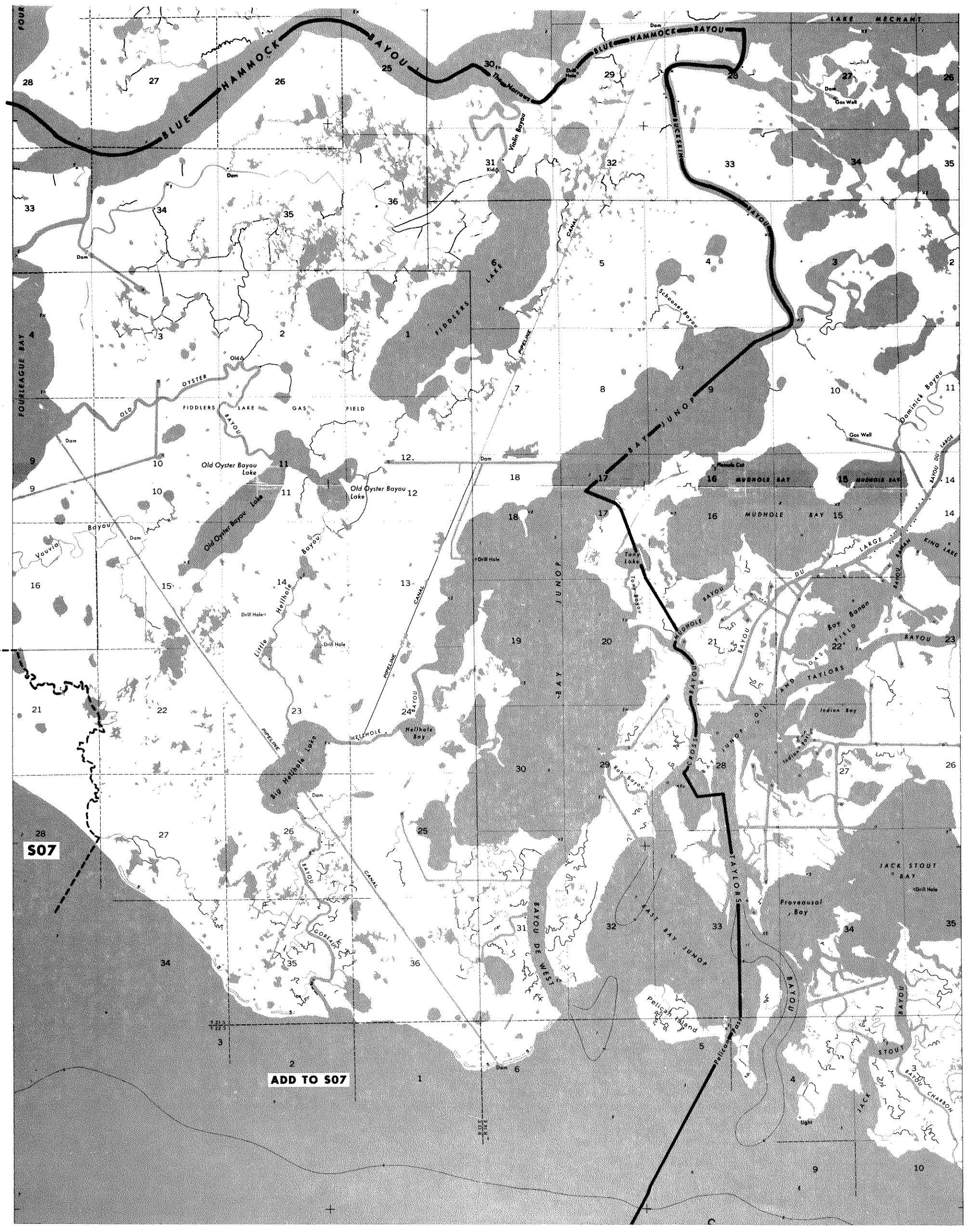

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QUADRANGLE

EAST BAY JUNOP

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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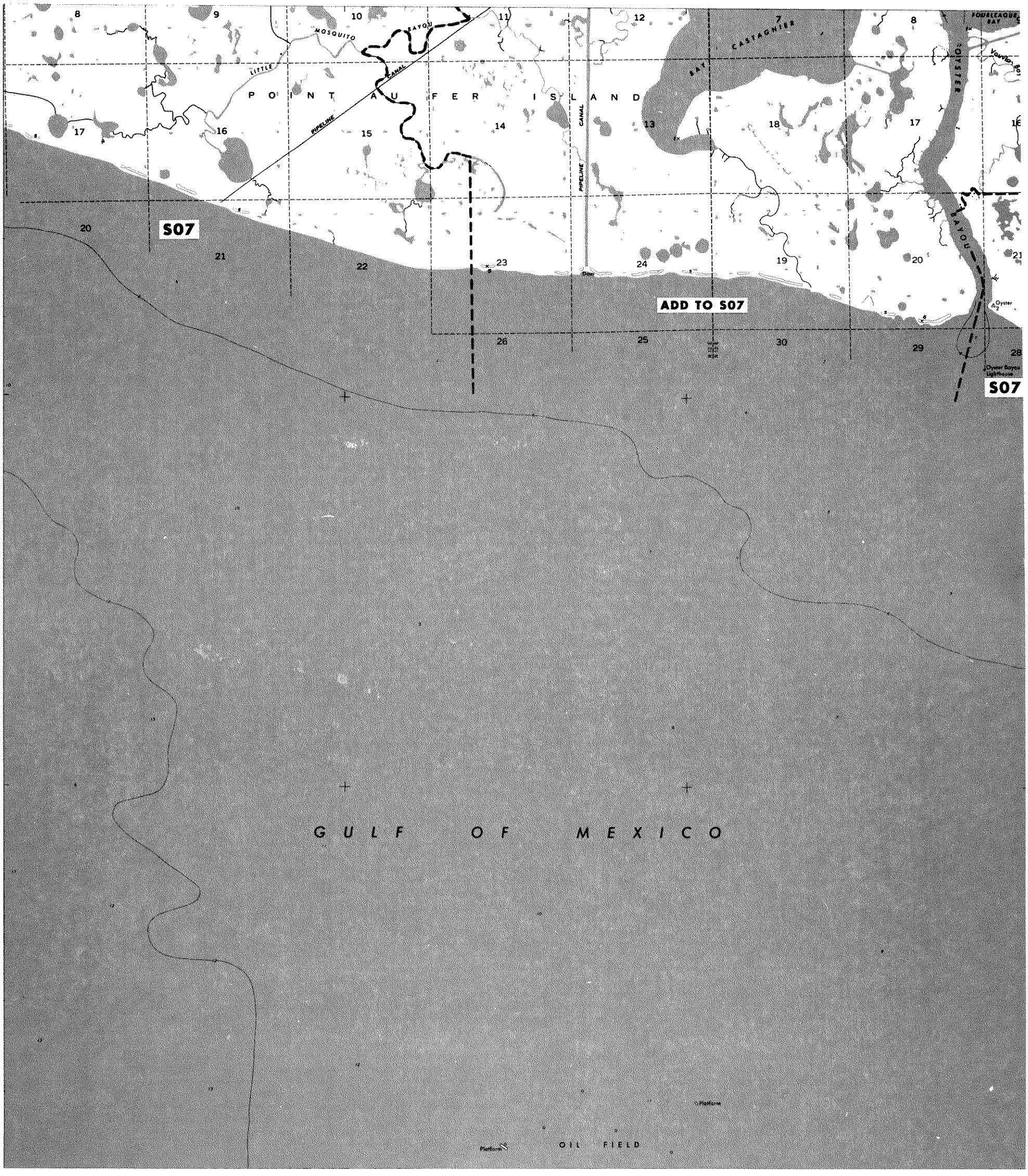
41

North

Base Map is the U.S. Geological Survey 1:24,000 scale quadrangle.



Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR

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Washington, D.C. 20240

QUADRANGLE

OYSTER BAYOU

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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42

North

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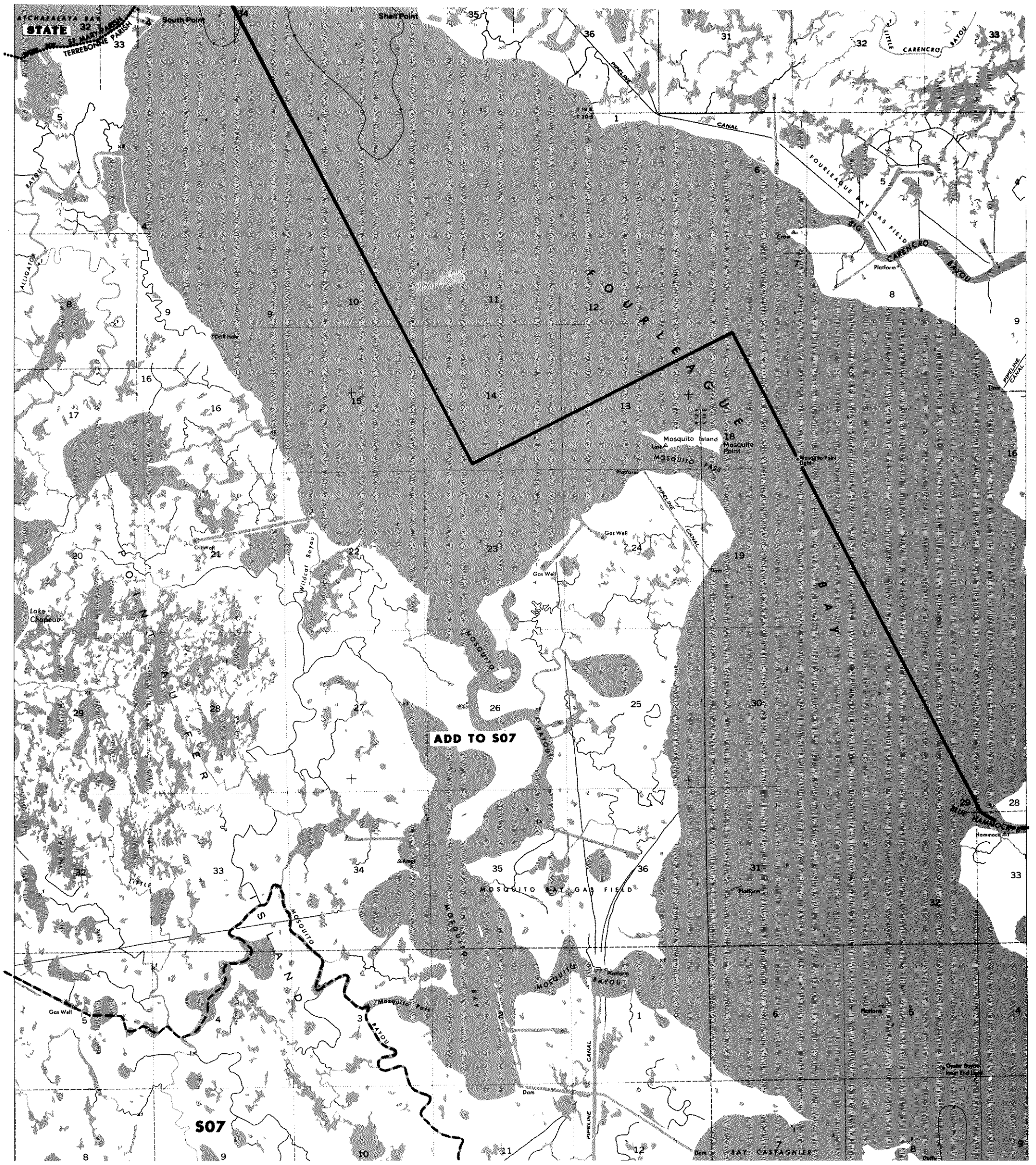

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QUADRANGLE

FOURLEAGUE BAY

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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43

North

Base Map is the U.S. Geological Survey 1:24,000 scale quadrangle.

Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR

QUADRANGLE

PLUMB BAYOU

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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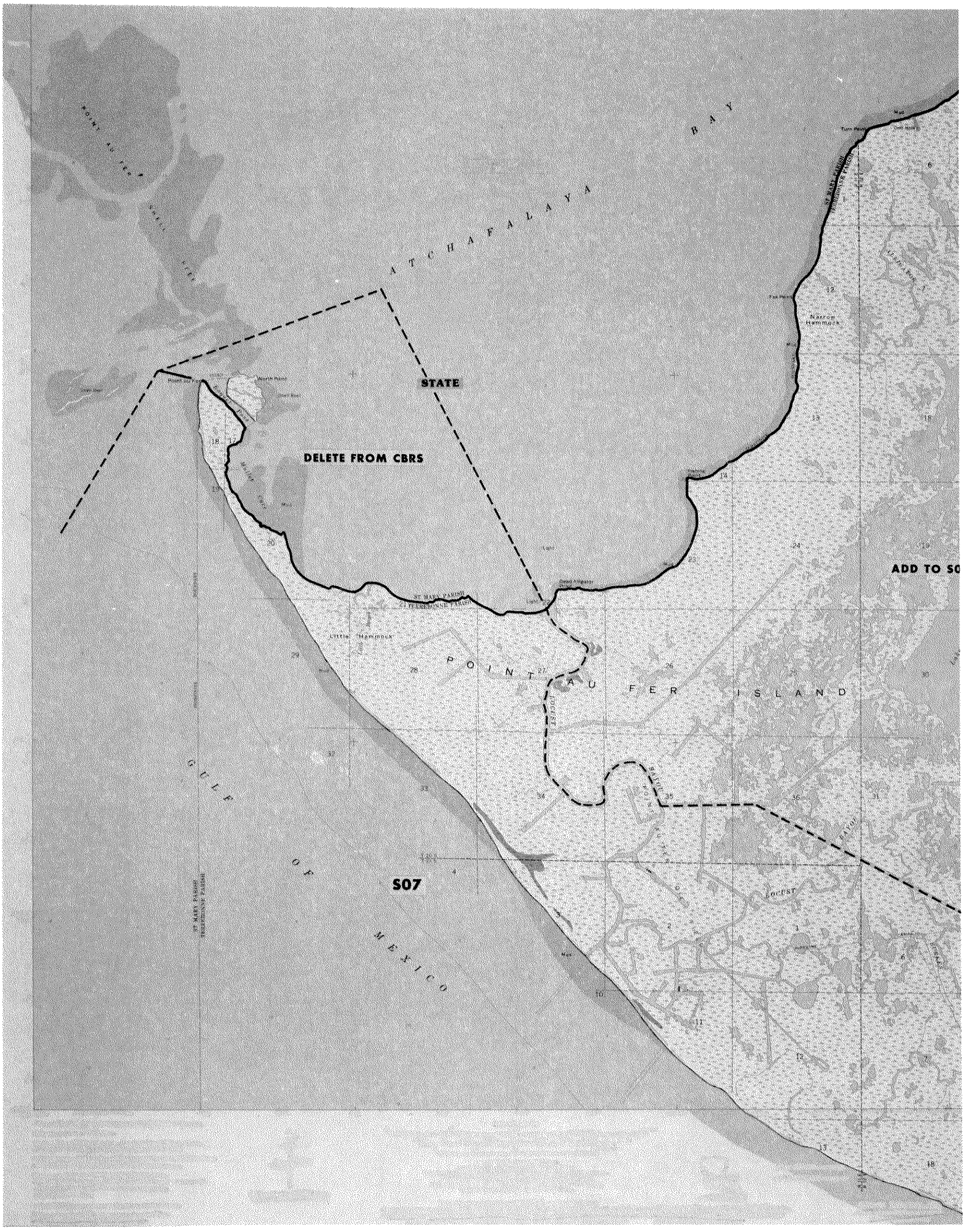
Base Map is the U.S. Geological Survey 1:24,000 scale quadrangle.

44



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QUADRANGLE

POINT AU FER

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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North

Base Map is the U.S. Geological Survey 1:24,000 scale quadrangle.

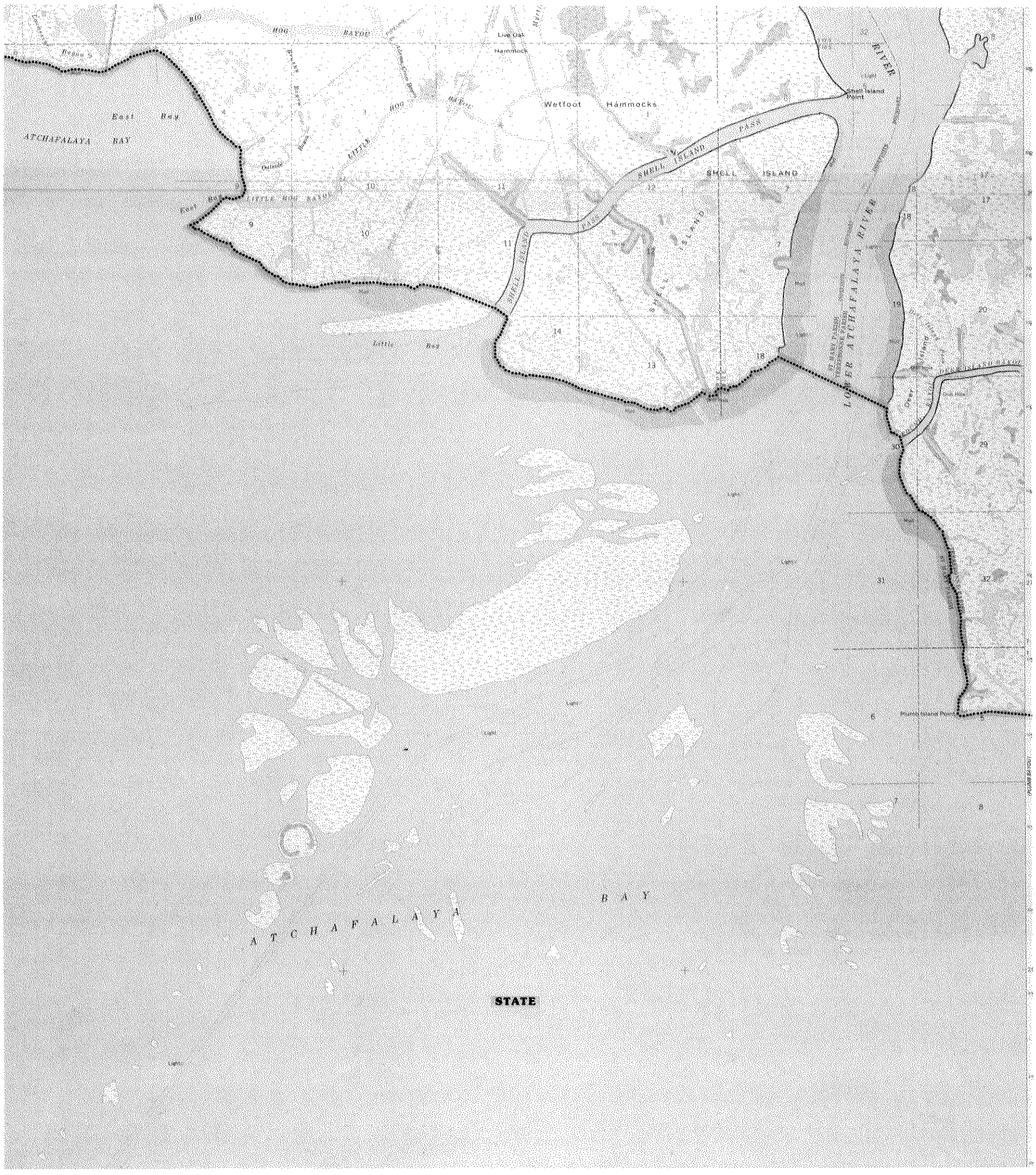
S07 - POINT AU FER

State Position: The State of Louisiana requested the deletion of the Atchafalaya Delta Wildlife Management Area from the existing CBRS unit.

Other Comments: The Louisiana Shallow-Draft Ports and Waterways Commission also requested that the Atchafalaya Delta Wildlife Management Area be deleted from the CBRS. Their letter is reprinted under S04 (letter number 887). The New Orleans District of the Army Corps of Engineers expressed concern that the proposed landward boundary of S07 is more than 5 miles inland. Their letter is reprinted under S03 (letter number 1757).

Response: The Atchafalaya Delta Wildlife Management Area is State-protected and the DOI is not recommending that otherwise protected areas be included in the CBRS unless they are made available for development that is inconsistent with the CBRA purposes. In addition to the recommended deletion from the existing unit, the boundaries of associated aquatic habitat recommended for addition to the CBRS have been modified from those in the 1987 Draft Report to exclude the remainder of the Wildlife Management Area.

DOI Recommendation: The DOI recommends deleting that portion of S07 that is part of the State-protected Atchafalaya Delta Wildlife Management Area from the CBRS. The DOI also recommends adding the unprotected associated aquatic habitat to S07.



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QUADRANGLE

POINT AU FER NE

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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47

North

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QUADRANGLE

BELLE ISLE

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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48

North

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QUADRANGLE

POINT CHEVREUIL

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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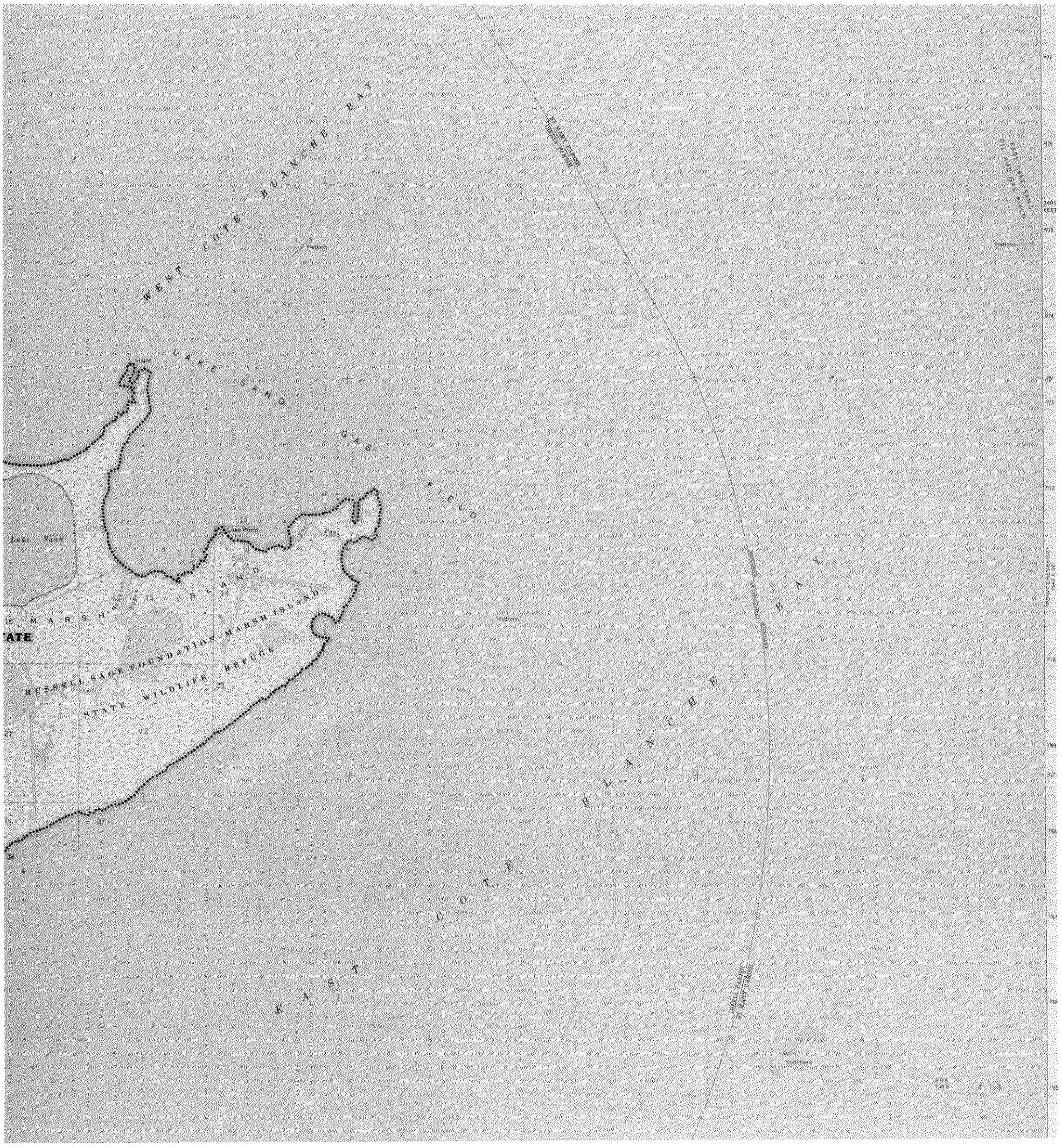

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QUADRANGLE

LAKE POINT

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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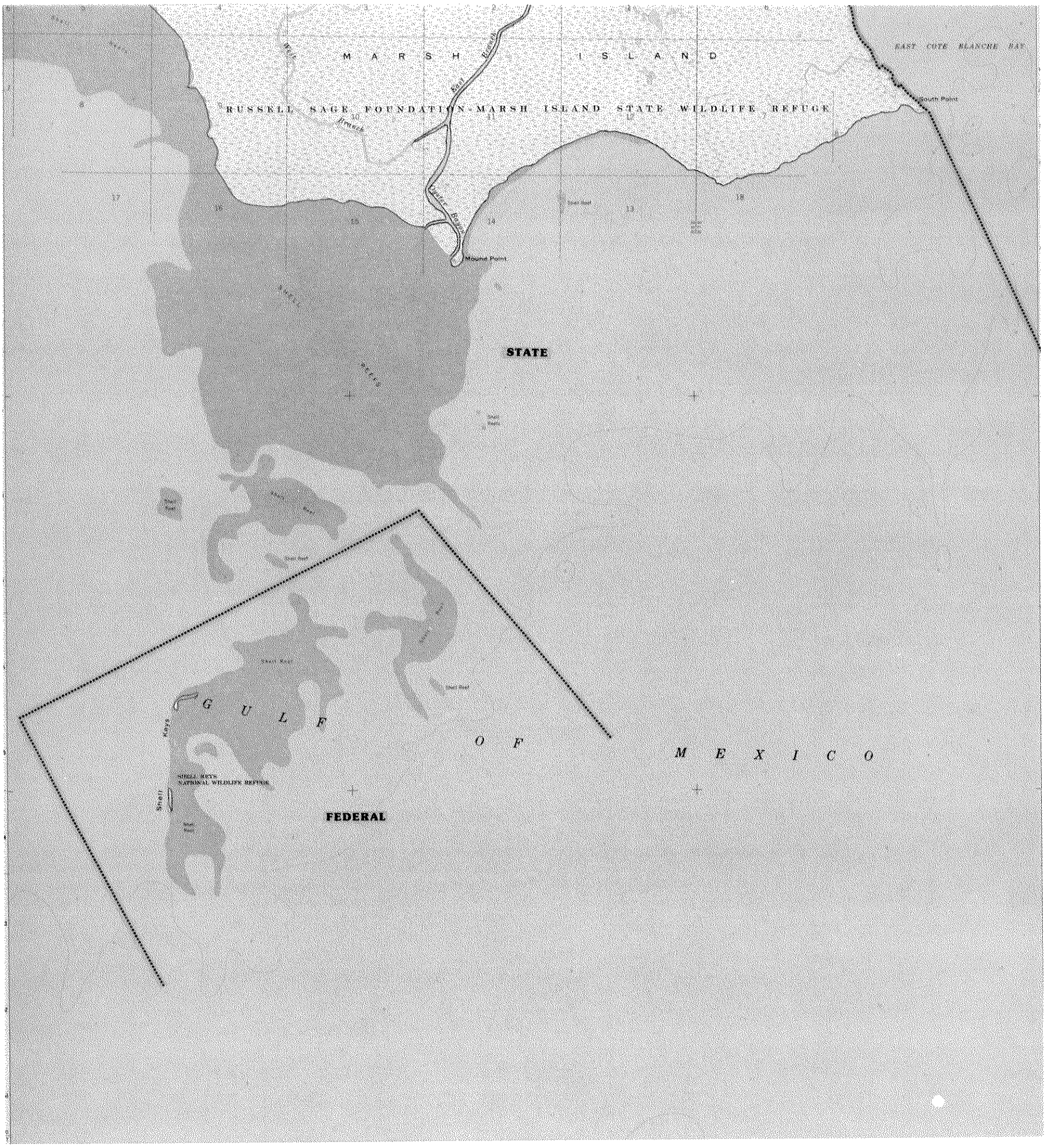
50



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QUADRANGLE

MOUND POINT

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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North

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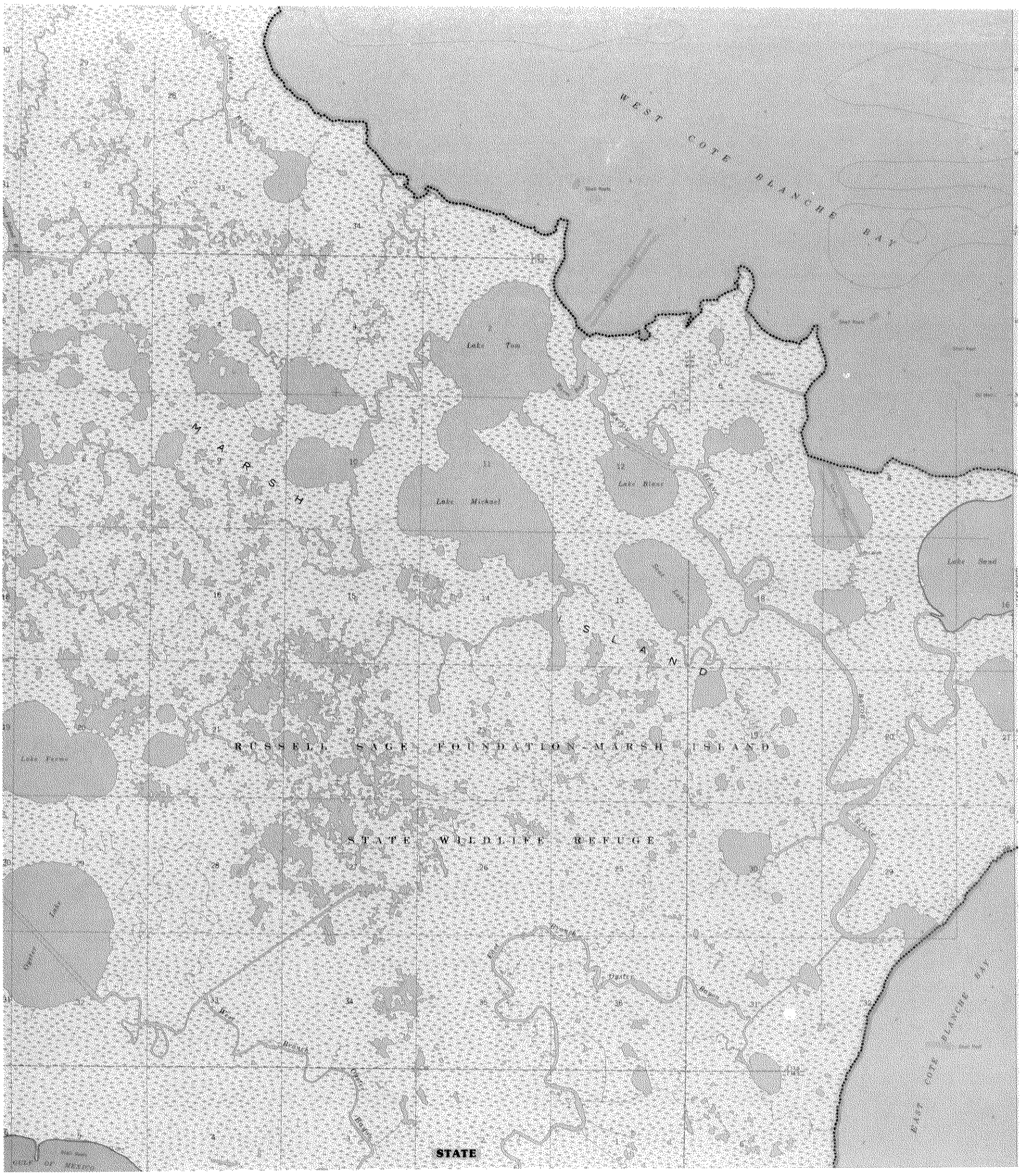
51



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QUADRANGLE
BAYOU BLANC
LOUISIANA

SCALE
1 1/2 0 1 MILE
1000 0 1000 2000 3000 4000 5000 6000 7000 FEET
1 5 0 1 KILOMETER

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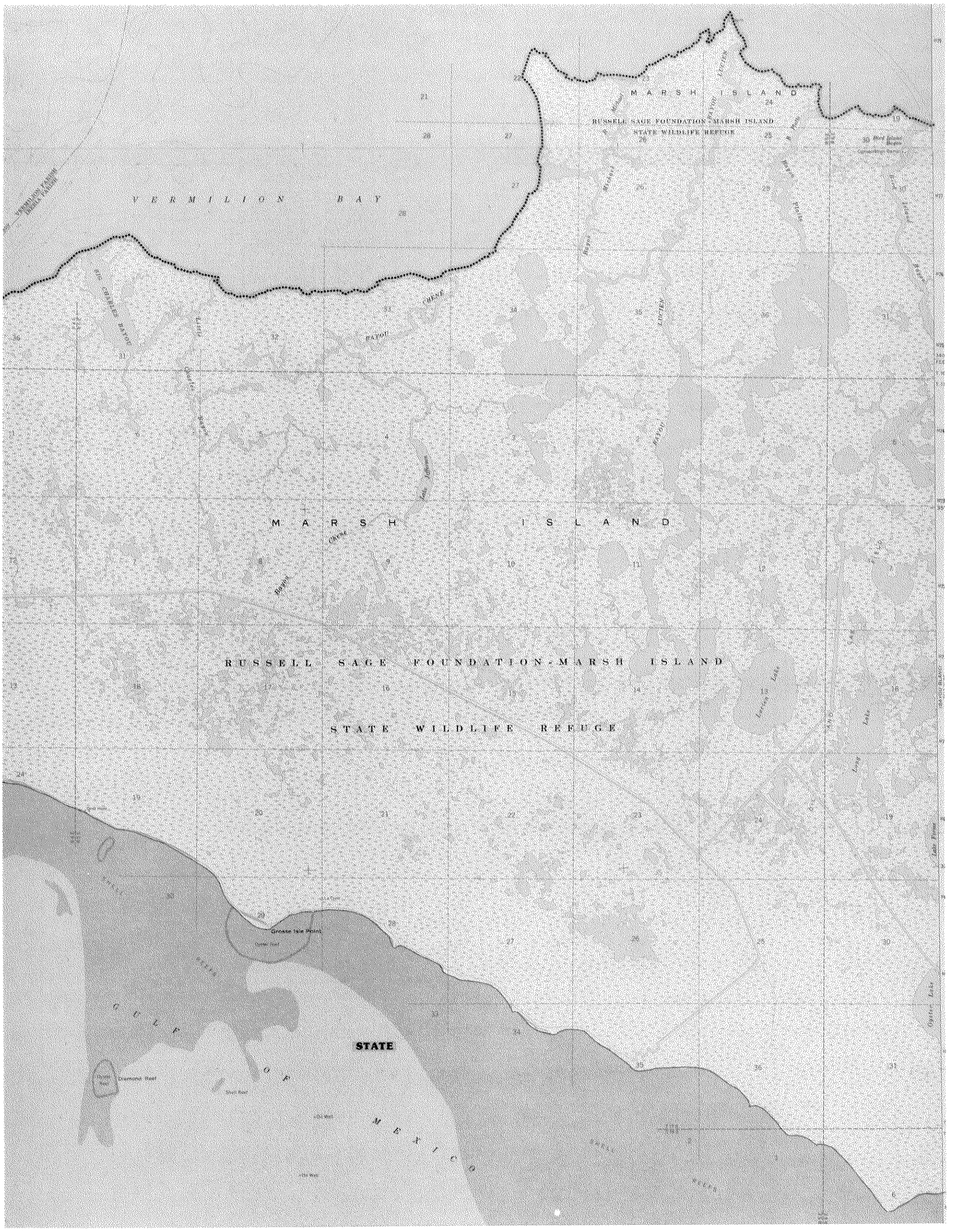

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QUADRANGLE

BAYOU LUCIEN

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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53

North

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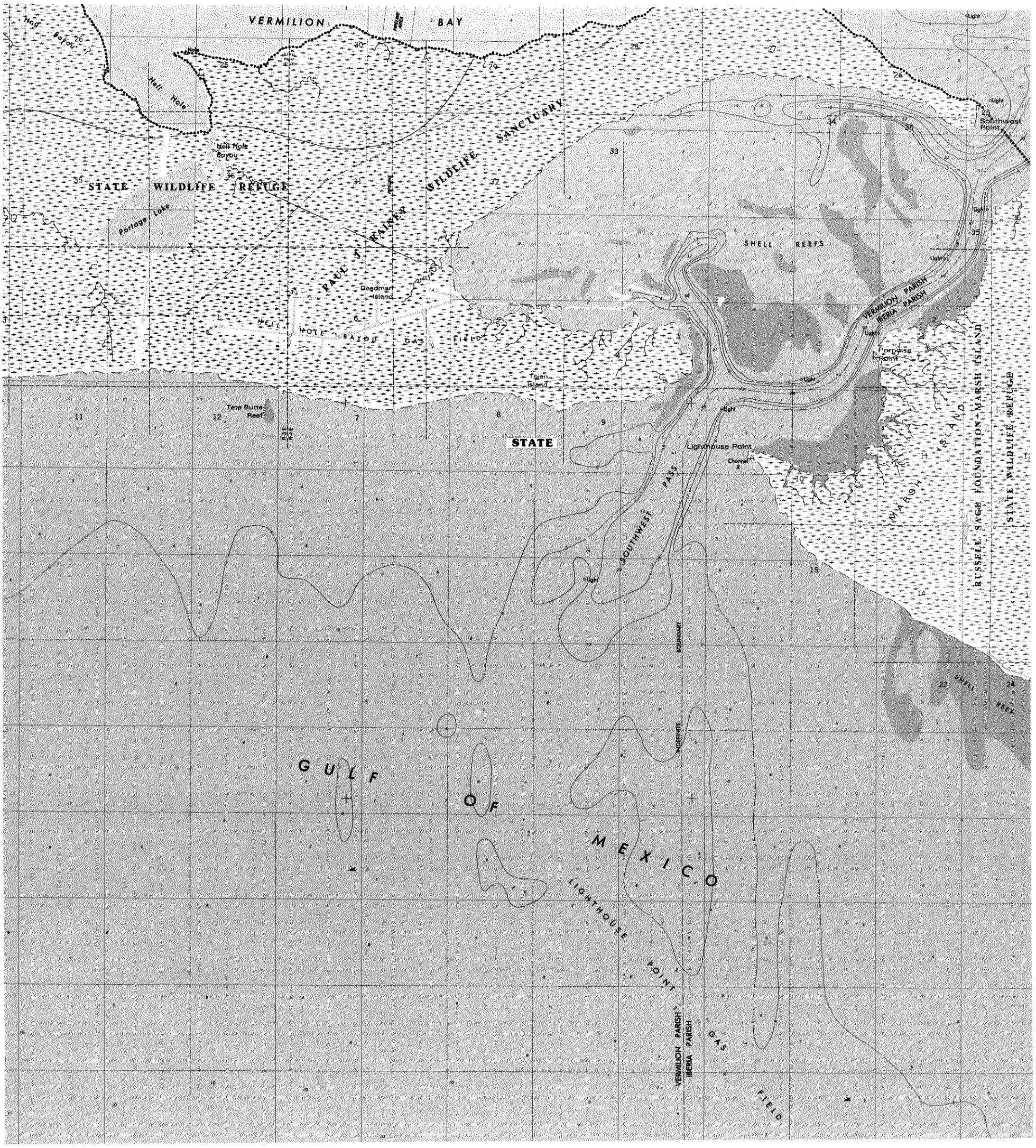

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QUADRANGLE

HELL HOLE BAYOU

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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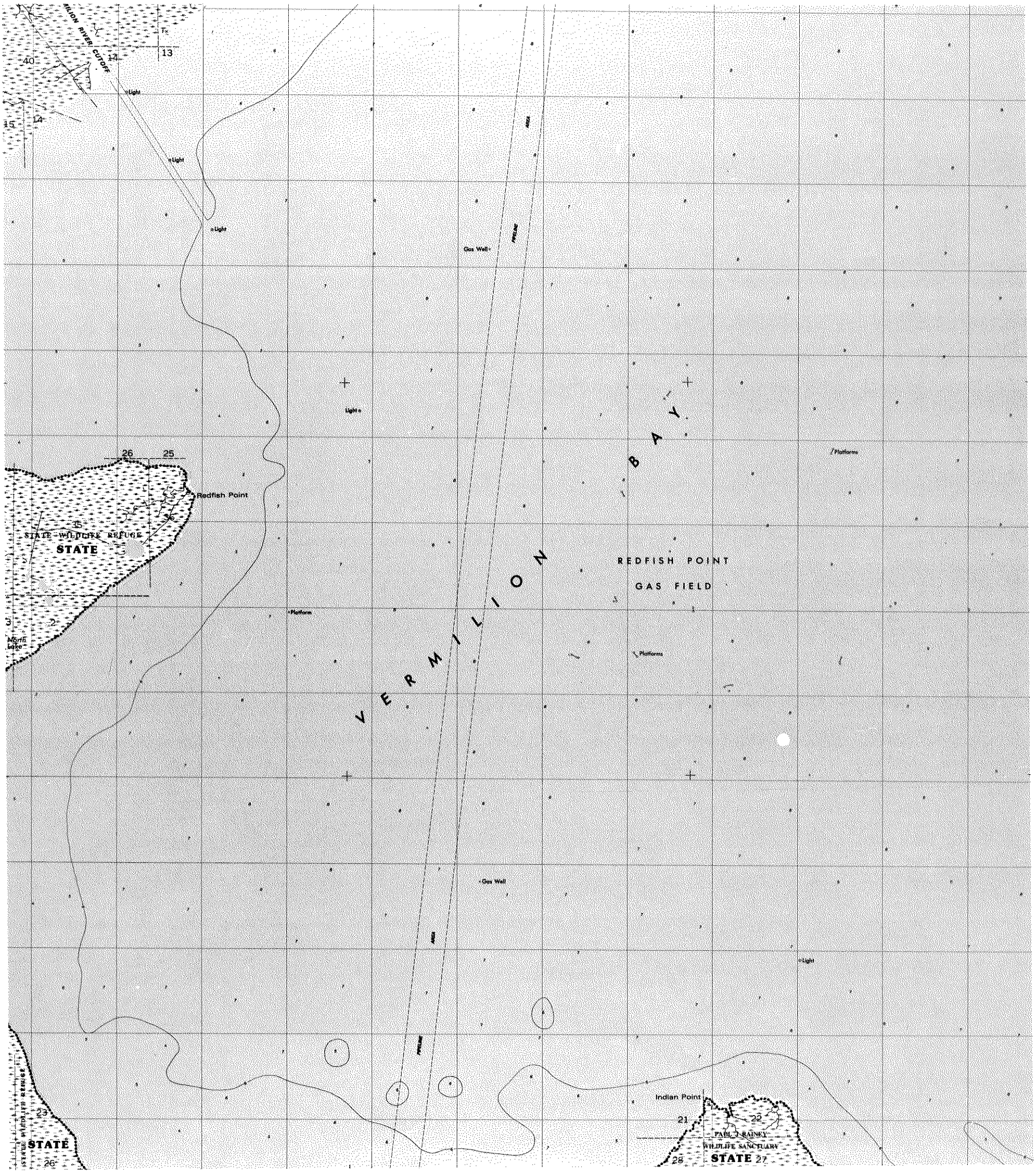
54



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QUADRANGLE

RED FISH POINT

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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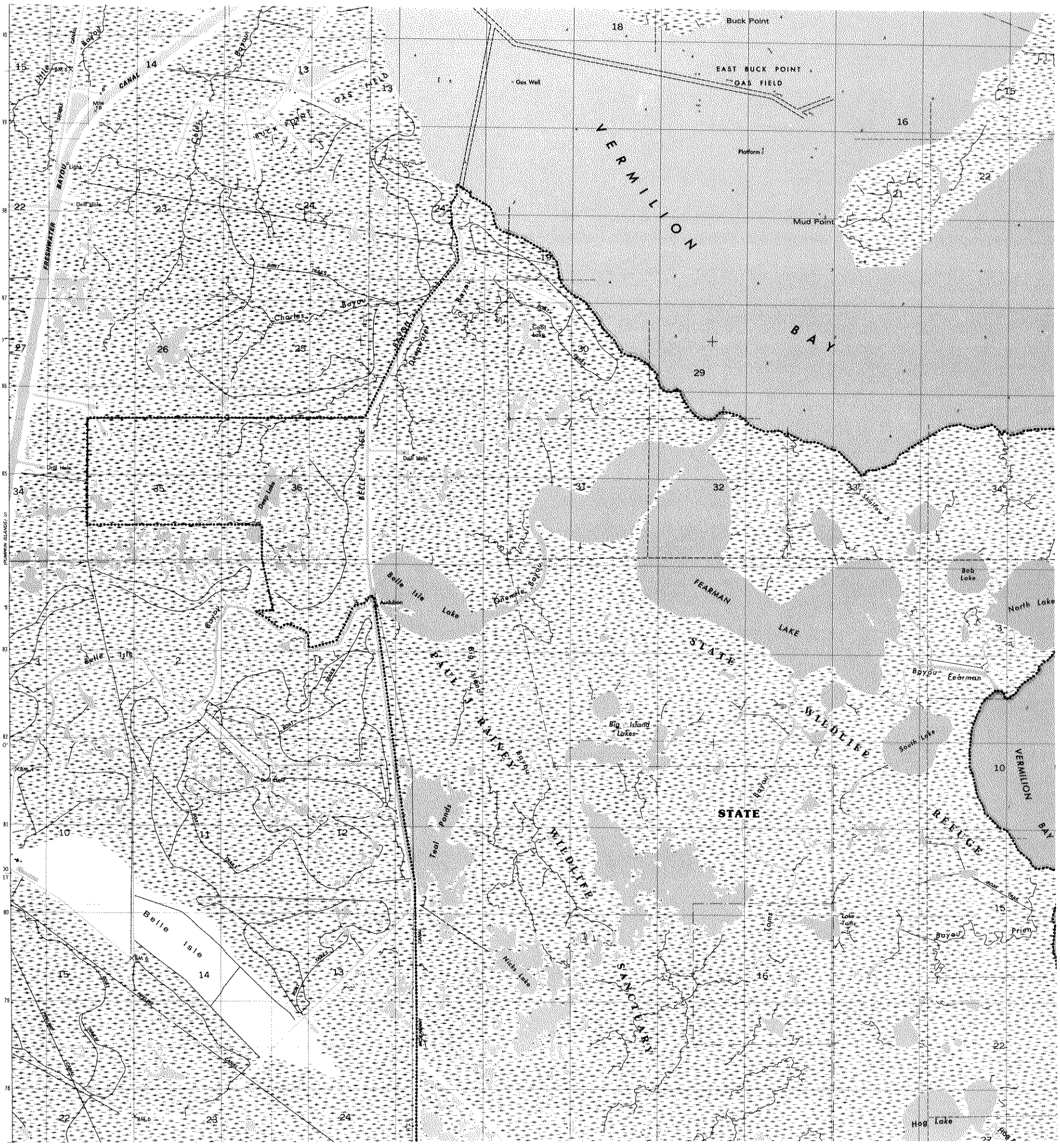

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QUADRANGLE
FEARMAN LAKE
LOUISIANA

SCALE
1 1/2 0 1 MILE
1000 0 1000 2000 3000 4000 5000 6000 7000 FEET
1 5 0 1 KILOMETER

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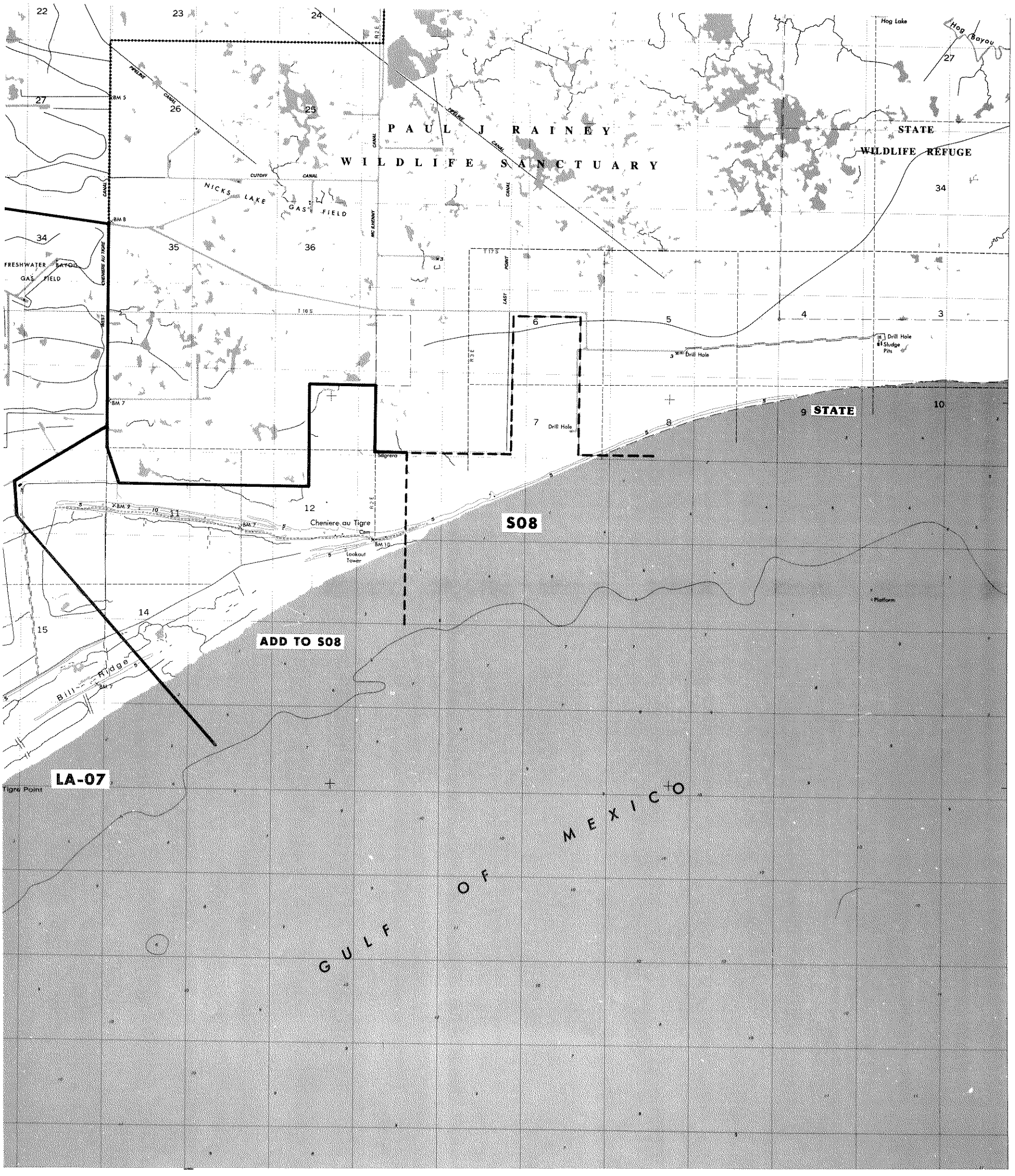

Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR

QUADRANGLE

CHENIERE AU TIGRE

LOUISIANA

SCALE

1 1/2 0 1 2 3 4 MILES

3000 0 3000 6000 9000 12000 15000 18000 21000 FEET

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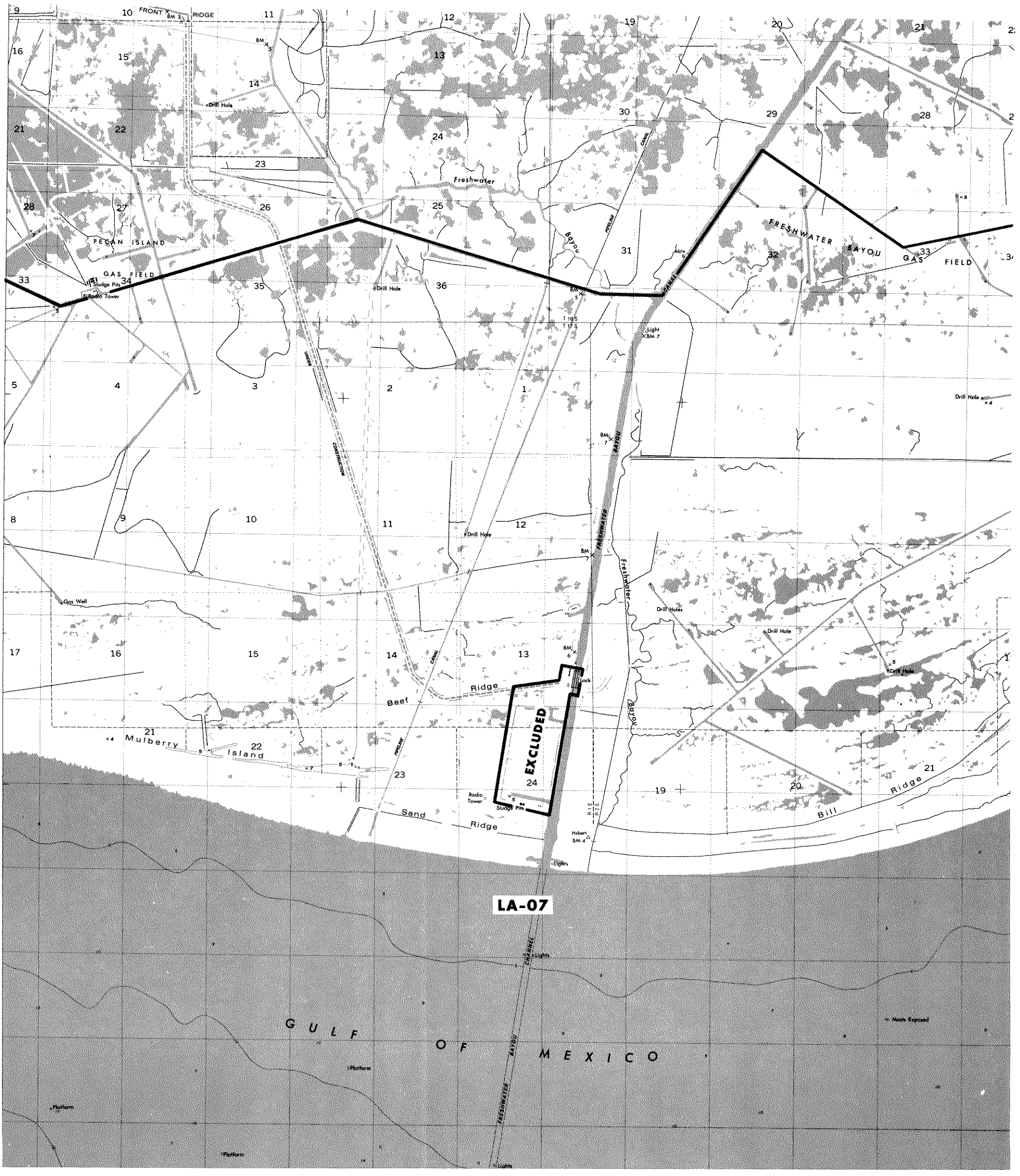
North

Base Map is the U.S. Geological Survey 1:62,500 scale quadrangle.

57



Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR

QUADRANGLE

MULBERRY ISLAND EAST

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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58

North

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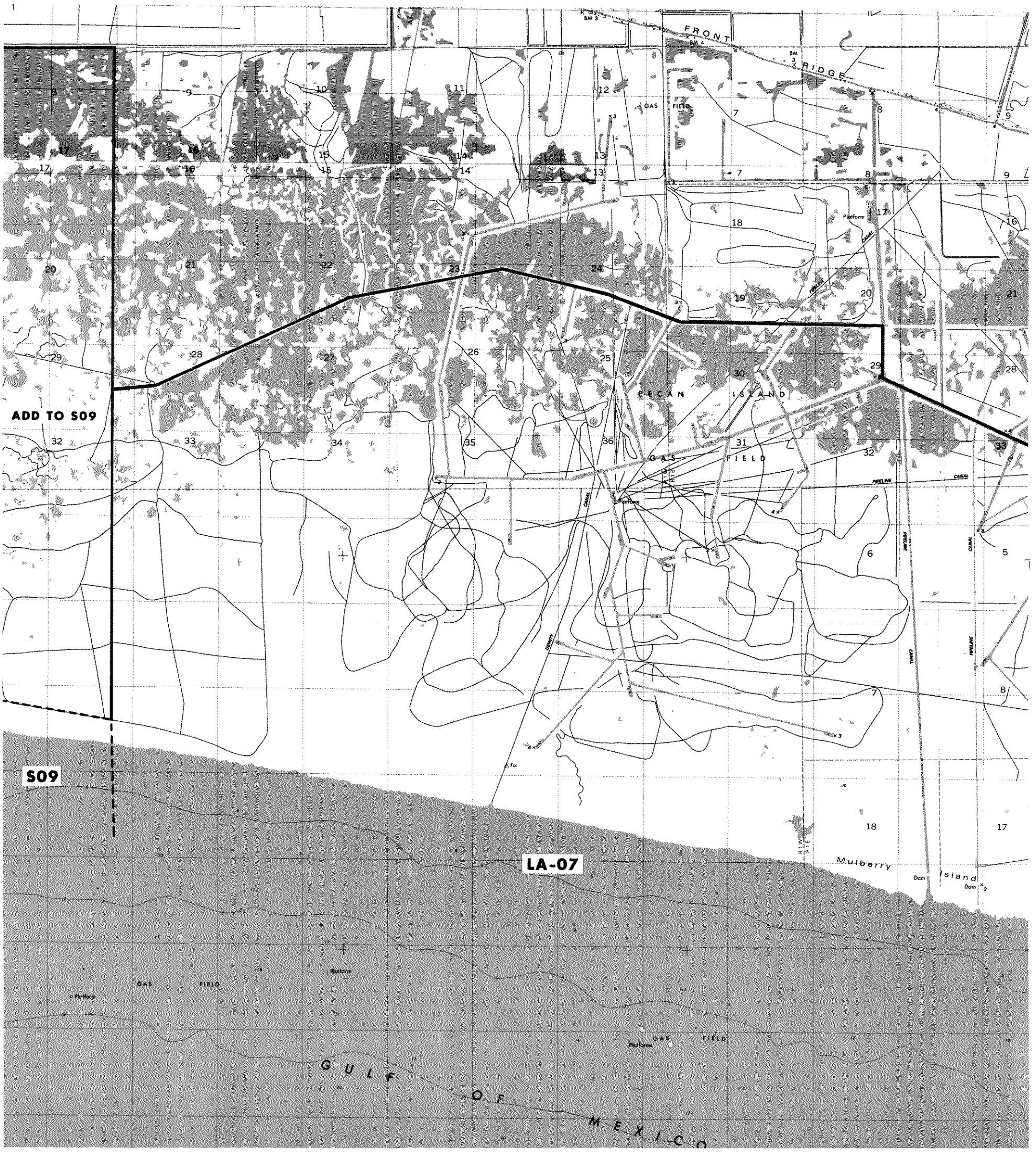

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QUADRANGLE

MULBERRY ISLAND WEST

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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59

North

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LA-07 - FRESHWATER BAYOU

State-Position: The State of Louisiana endorsed the Louisiana Shallow-Draft Ports and Waterways Commission and Abbeville Harbor and Terminal District positions, described below, which requested the deletion of a portion of LA-07 on the east bank of Freshwater Bayou Canal from DOI's recommendations.

Other Comments: The Louisiana Shallow-Draft Ports and Waterways Commission and the Abbeville Harbor and Terminal District requested the deletion of a portion of LA-07 on the east bank of Freshwater Bayou Canal at Freshwater Bayou Lock from DOI's recommended additions to the CBRS. The commenters stated that new facilities may be established there.

The Abbeville Harbor and Terminal District letter is reprinted below. The Louisiana Shallow-Draft Ports and Waterways Commission letter is reprinted under S04 (letter number 887).

Response: All of proposed CBRS unit LA-07 is undeveloped and fully meets DOI criteria for addition to the CBRS.

DOI Recommendation: The DOI recommends adding LA-07 to the CBRS.

ABBEVILLE
HARBOR & TERMINAL DISTRICT
P. O. Box 507
Abbeville, Louisiana 70511-0507
(318) 893-9465

1659

October 28, 1987

WAYNE LeBLEU
President
GLENN LEGE
Vice President
GERALD LIBERSAT
Treasurer
N.R. BROUSSARD
Commissioner
JIMMIE VORHOFF, JR.
Commissioner
J.W. CAMPBELL
Executive Director
ROSE TOTH
Secretary

Coastal Barriers Study Group
U.S. Department of the Interior
National Park Service - - - 498
P. O. Box 37127
Washington, D.C. 20013-7127

Dear Coastal Barriers Study Group:

I am forwarding to you a copy of the resolution passed by the Board of Commissioners of the Abbeville Harbor & Terminal District concerning Freshwater Bayou presently included in the proposed Coastal Barrier Resources System.

I would like to ask you to give full consideration in accordance with the delineation criteria to the recommendations for excluding the areas shown in the attached map of the Freshwater Bayou (LA-07) area.

If further information is needed please contact me at your convenience at (318) 893-9465.

Respectfully,

JAMES W. CAMPBELL
Executive Director
Abbeville Harbor & Terminal District

JWC:rt

CC: Bennett Johnston
John Breaux
Jimmy Hayes

At the regular meeting of the Board of Commissioners of the Abbeville Harbor and Terminal District, held on the 24th day of August, 1987, with a quorum being present. The following resolution was introduced by Gerald Libersat, and duly seconded by Glenn Lege, and carried:

R E S O L U T I O N

WHEREAS, Louisiana's coastal ports and waterways are essential for commerce of our nation; mineral exploration and production, both onshore and on the continental shelf; and for commercial and recreational fishing, and

WHEREAS, the U.S. Department of Interior is requested to submit its recommendations to Congress on additions to and deletions from the Coastal Barriers Resources System established by the Coastal Barriers Resources Act of 1982 (16 USC 3501 et seq) has issued a notice of its submission of its recommendations to Congress in the Federal Register, March 25, 1987, and has requested comments on these recommendations, and

NOW THEREFORE BE IT RESOLVED, by the Abbeville Harbor and Terminal District that the Secretary of the Interior review his recommendations with regard to their effect upon coastal shallow-draft ports and waterways of Louisiana and consider modifying them, especially with respect to

Establishment of a new CBRS unit (LA-07) shown on map 37 which includes recently established waterway facilities on the east bank of Freshwater Bayou Canal, at Freshwater Bayou Lock,

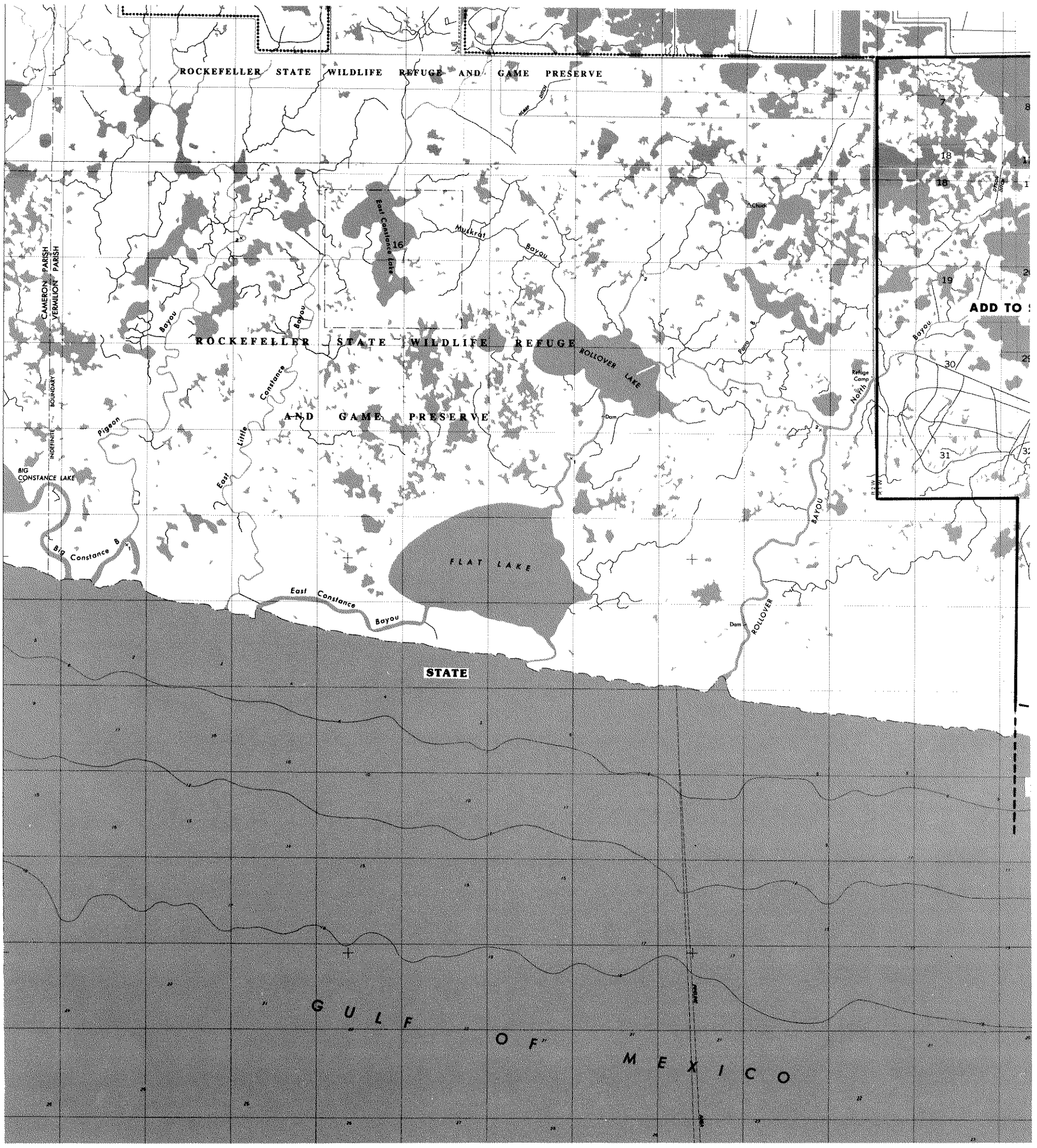
and be it further

RESOLVED, that copies of this resolution be sent to the Governor of Louisiana, members of the Louisiana Congressional delegation and affected coastal port and waterways interests for their information and action, and be it further

RESOLVED, that the Abbeville Harbor & Terminal District offers its full cooperation and assistance to the Department of the Interior, the Louisiana Congressional delegation, Louisiana state agencies and affected coastal ports and waterways interests in addressing these concerns.

Unanimously adopted August 25, 1987, at Abbeville, Louisiana

WAYNE LEBLEU, PRESIDENT



Report to Congress on the Coastal Barrier Resources System

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Washington, D.C. 20240

QUADRANGLE

ROLLOVER LAKE

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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62

North

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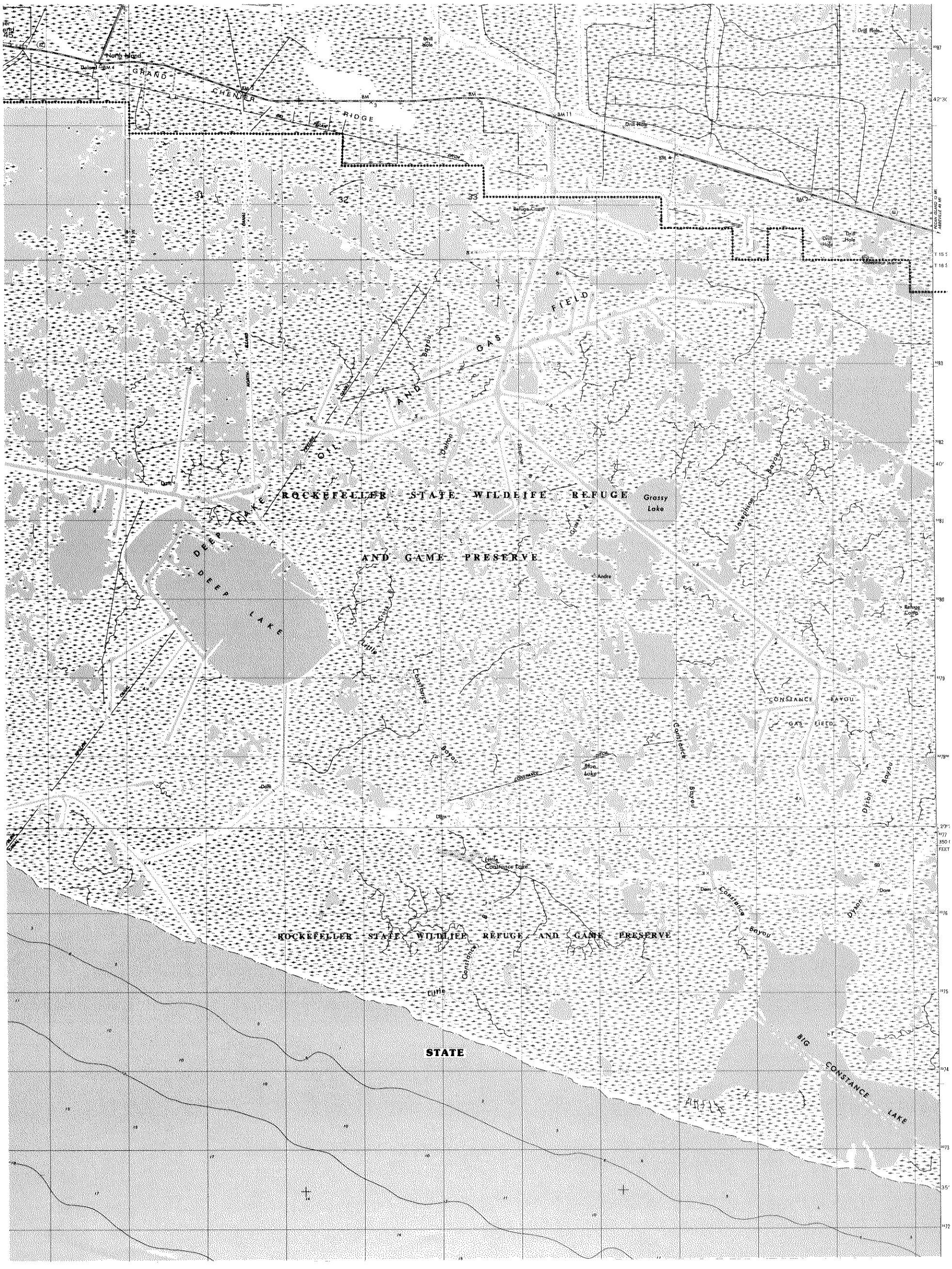

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QUADRANGLE

DEEP LAKE

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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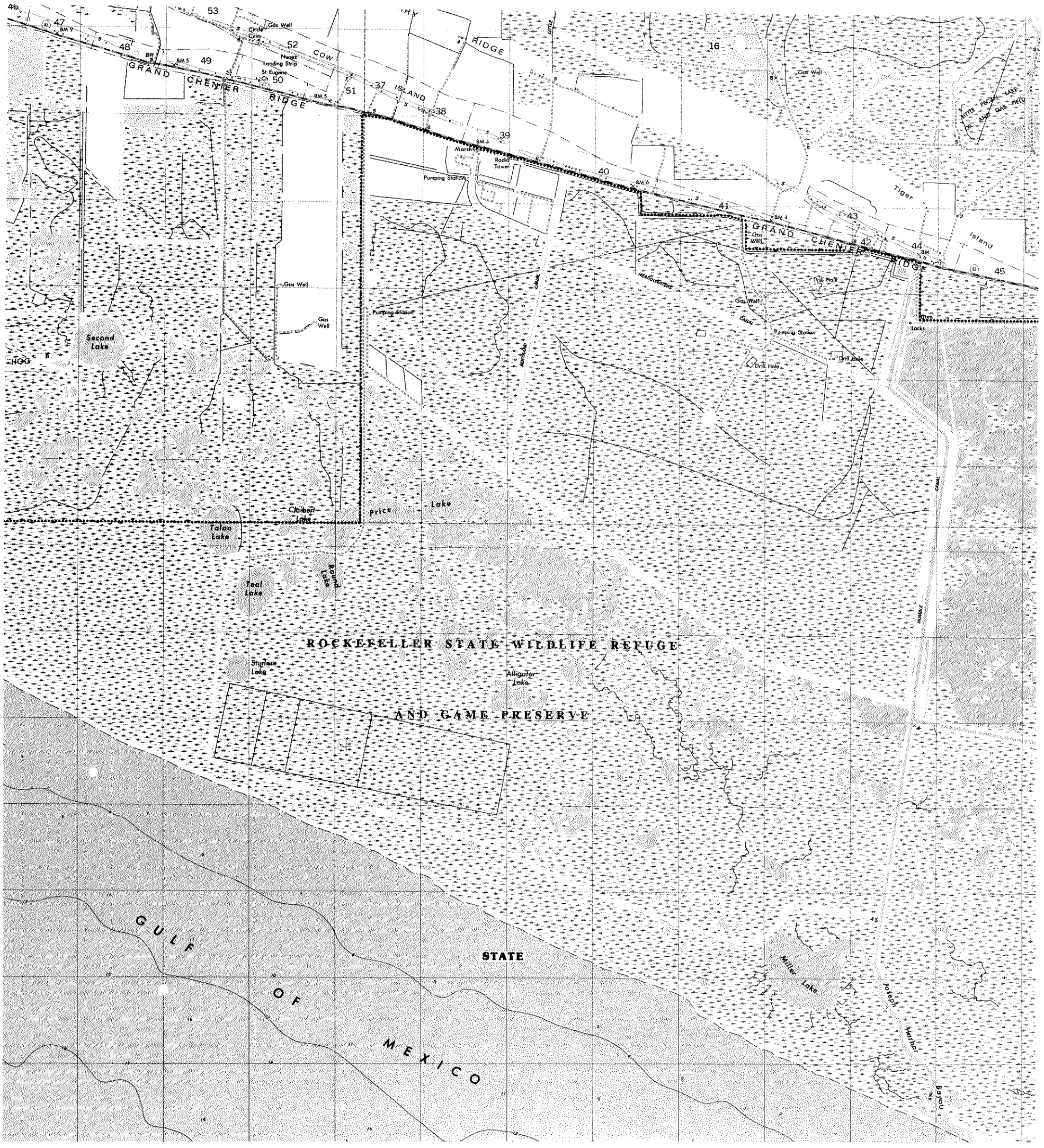
63

North

Base Map is the U.S. Geological Survey 1:24,000 scale quadrangle.



Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR

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Washington, D.C. 20240

QUADRANGLE

COW ISLAND

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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64

North

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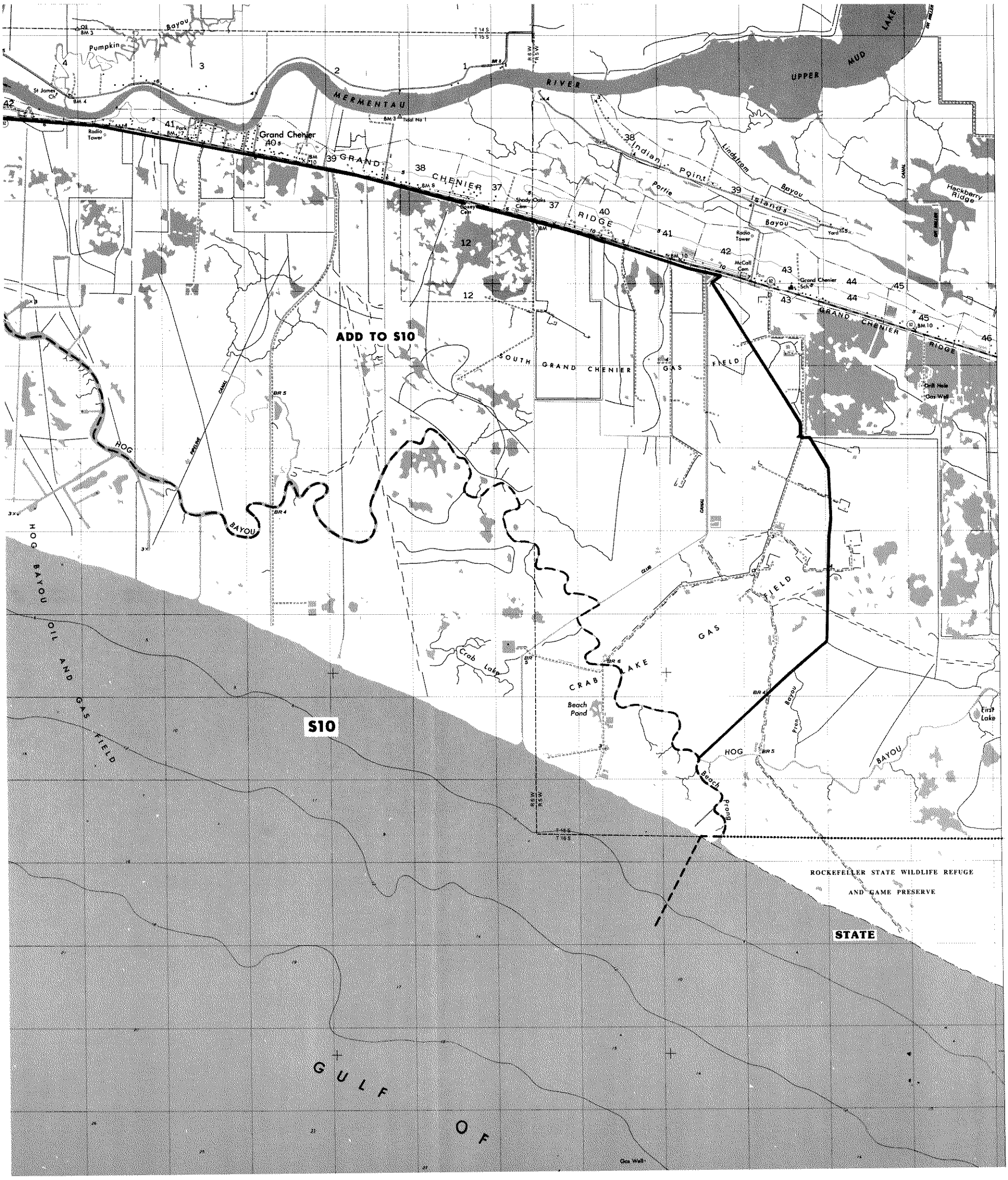

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QUADRANGLE

HOG BAYOU

LOUISIANA

SCALE

1 1/2 0 1 2 3 4 MILES

3000 0 3000 6000 9000 12000 15000 18000 21000 FEET

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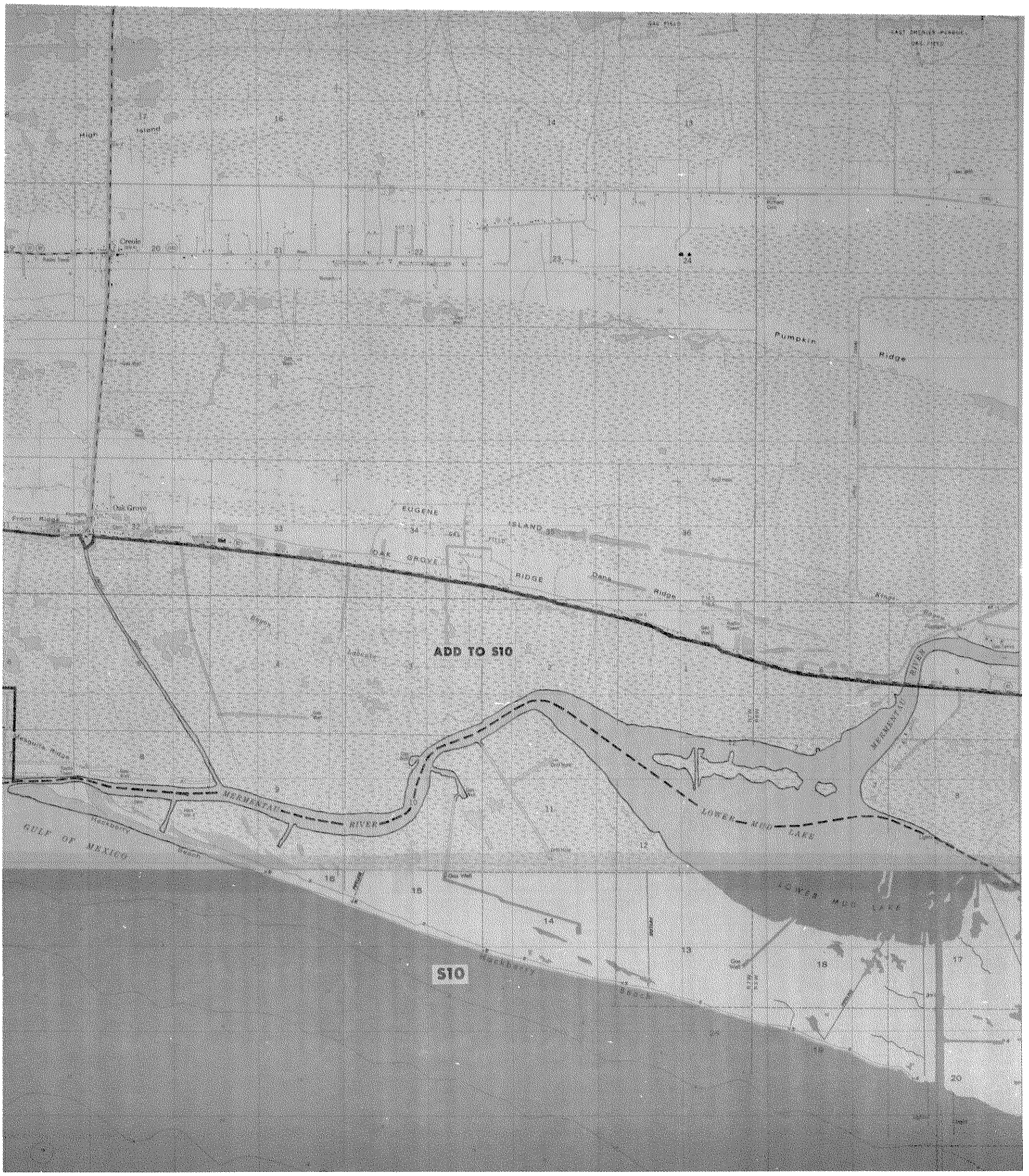
North

Base Map is the U.S. Geological Survey 1:62,500 scale quadrangle.



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QUADRANGLE

CREOLE

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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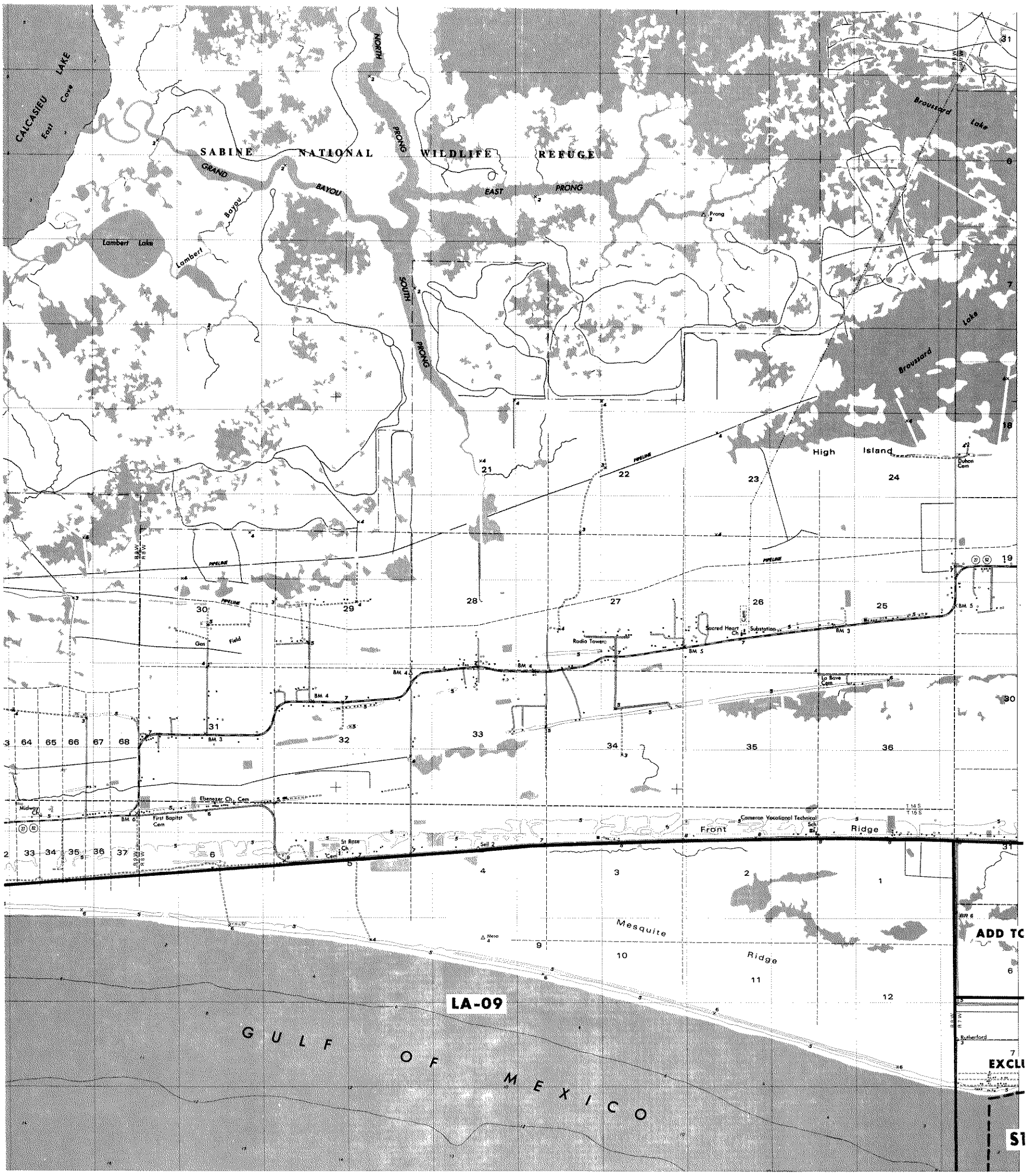

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QUADRANGLE

GRAND BAYOU

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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67

North

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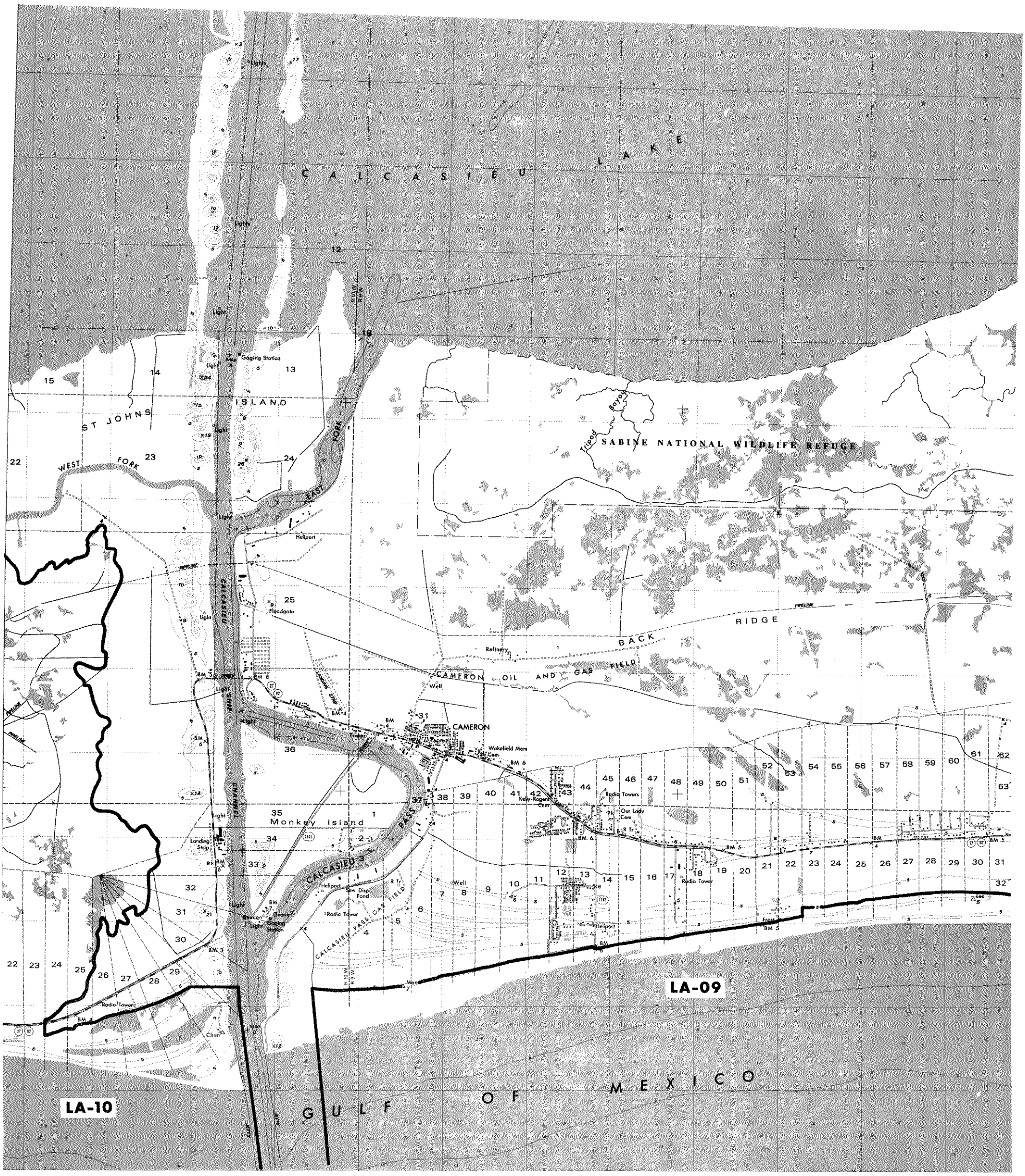

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QUADRANGLE

CAMERON

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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68

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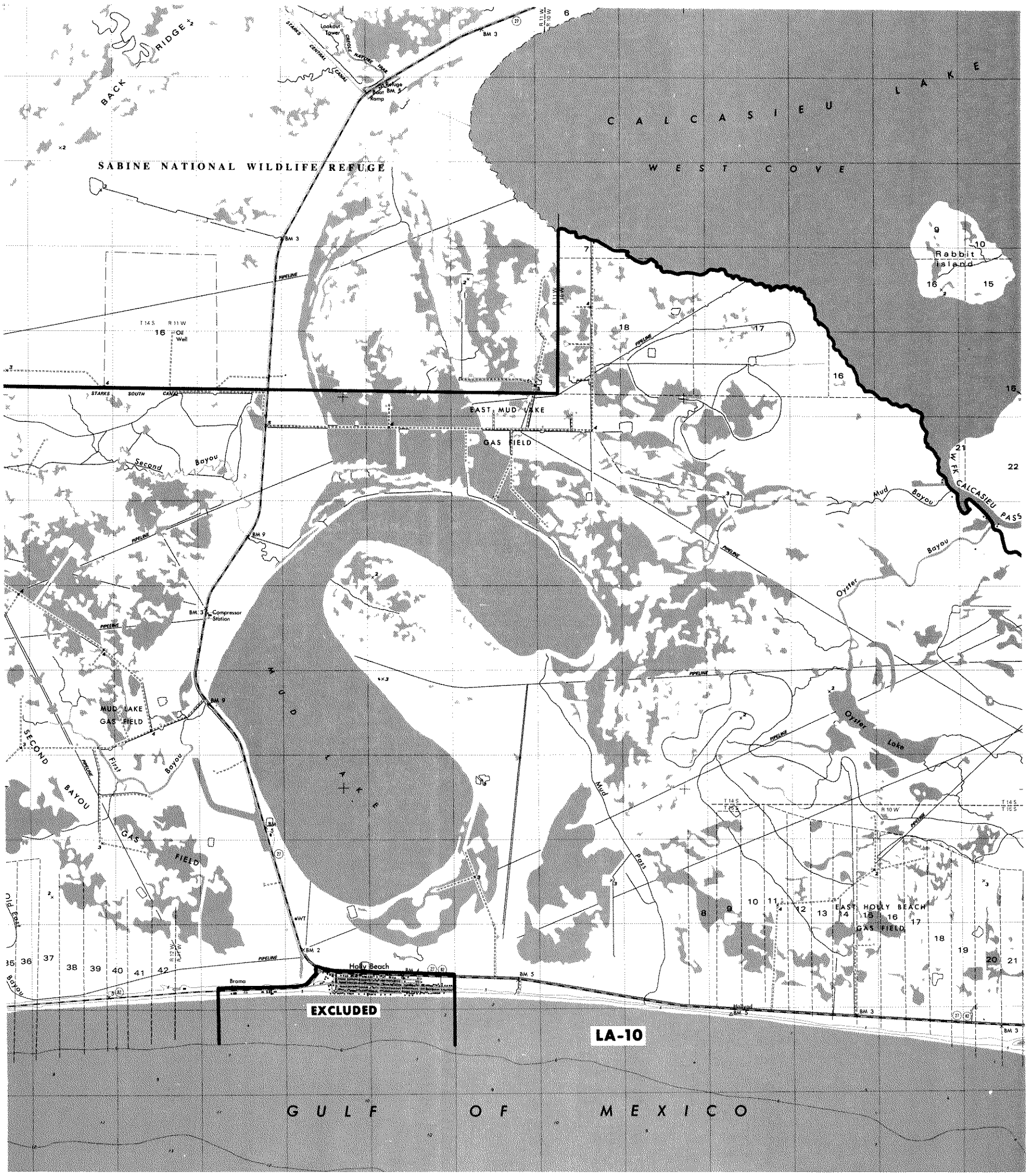

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QUADRANGLE

HOLLY BEACH

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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QUADRANGLE

PEVETO BEACH

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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70

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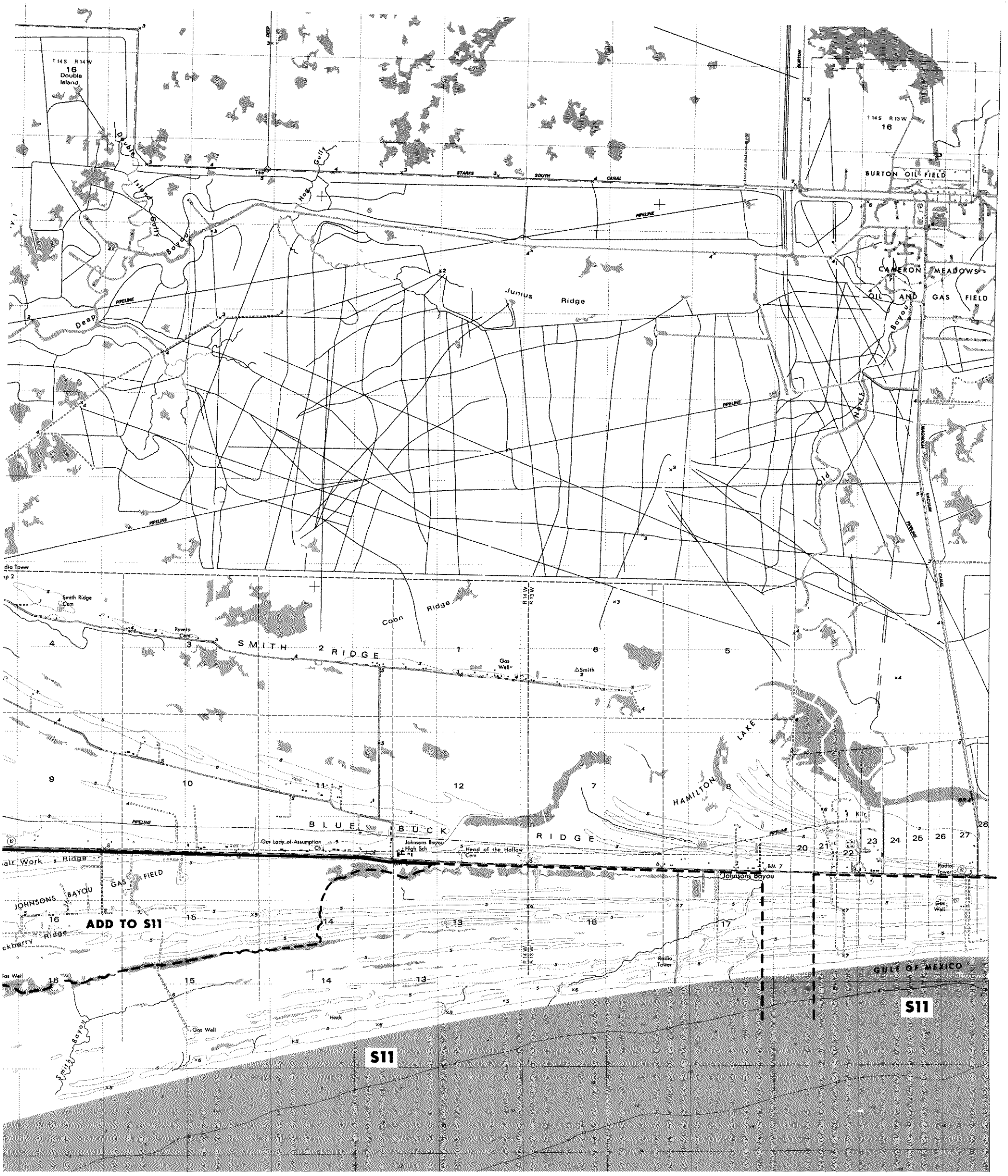

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QUADRANGLE

JOHNSONS BAYOU

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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71

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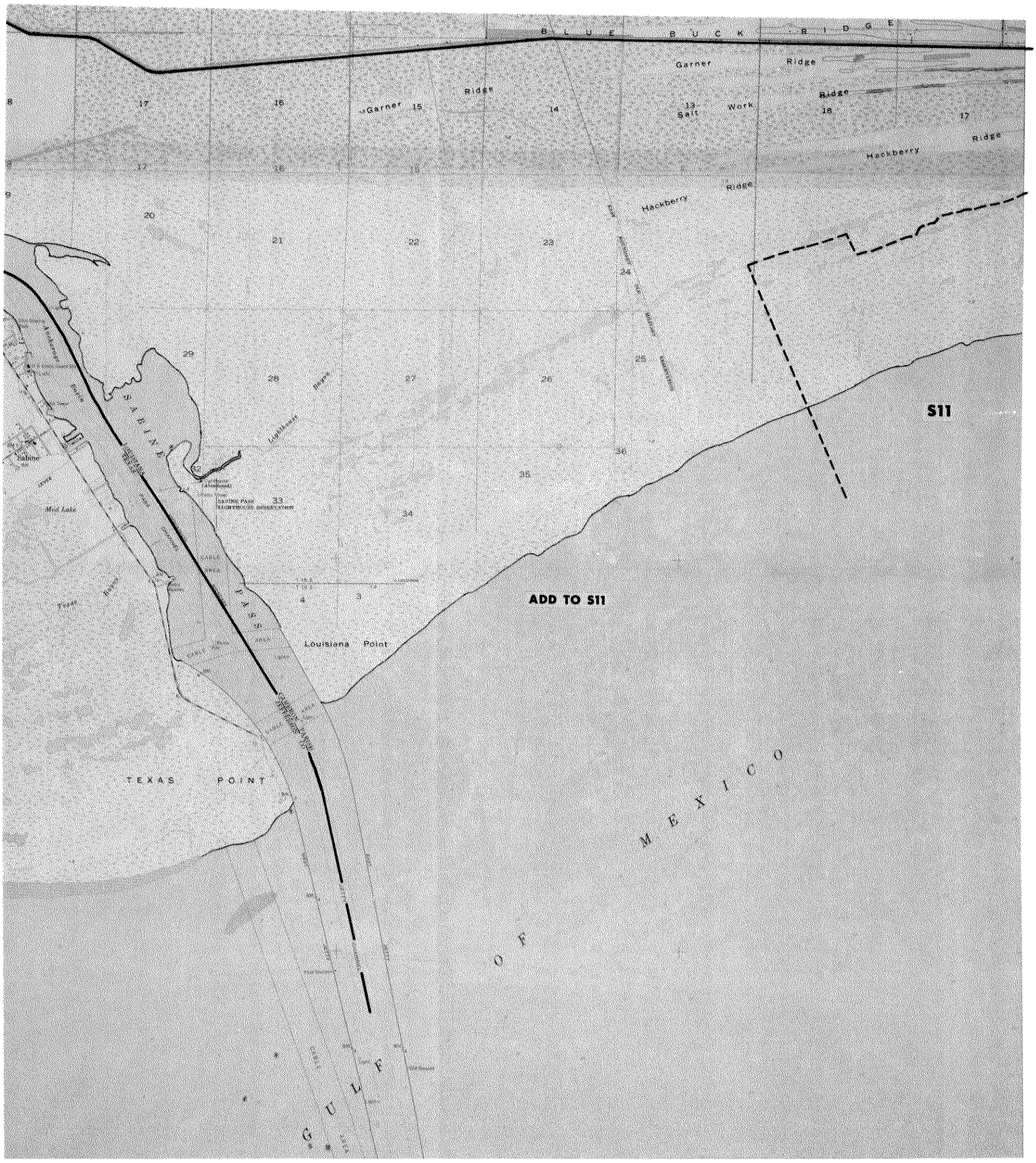

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QUADRANGLE

TEXAS POINT

LOUISIANA

SCALE

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

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72

North

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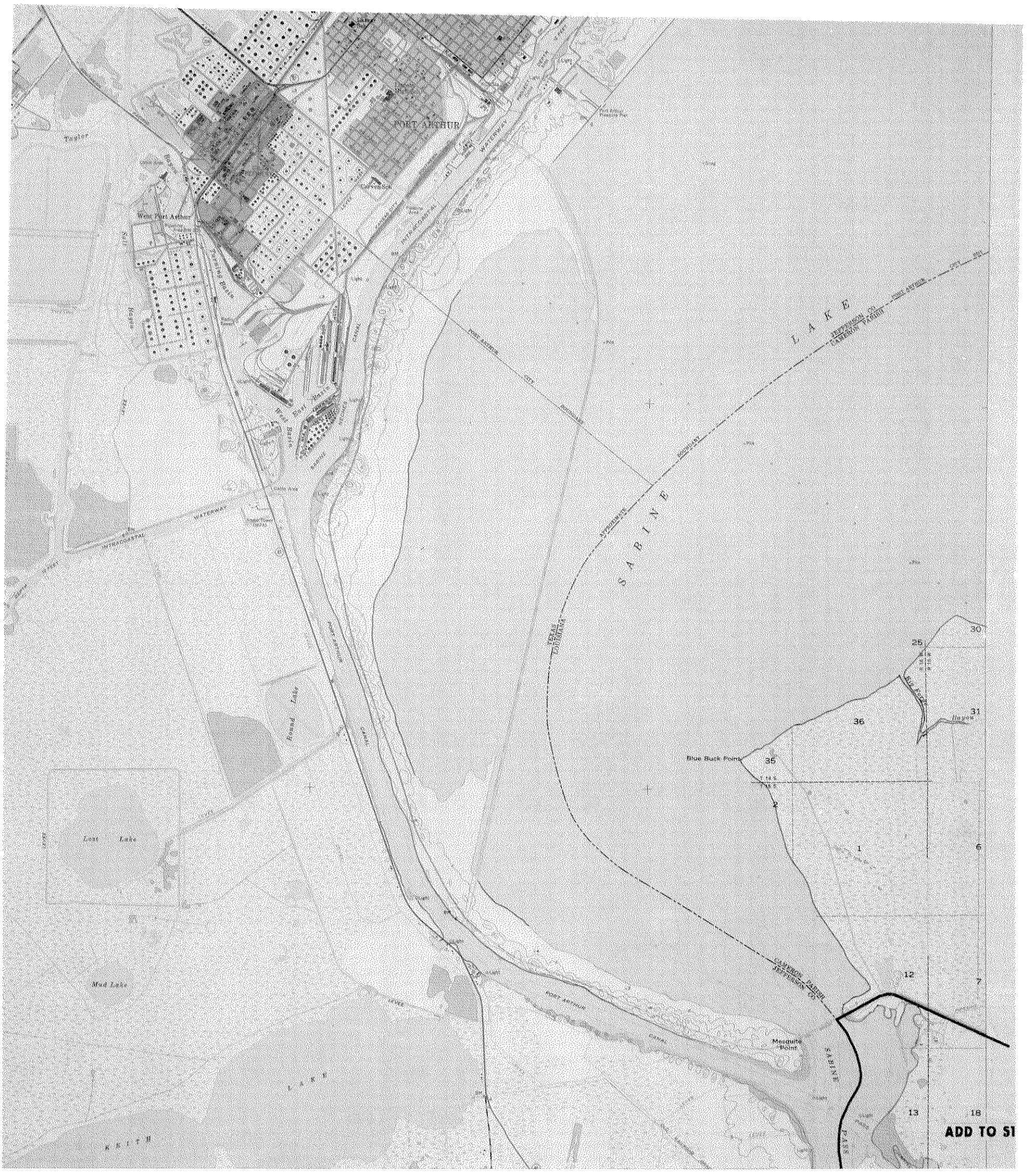

Report to Congress on the Coastal Barrier Resources System

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QUADRANGLE

PORT ARTHUR

LOUISIANA

SCALE
1 1/2 0 1 MILE
1000 0 1000 2000 3000 4000 5000 6000 7000 FEET
1 5 0 1 KILOMETER

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73

S10 - MERMENTAU RIVER; S11 - SABINE; LA-10 - CALCASIEU PASS

State Position: The State of Louisiana expressed no position on CBRS units S10 and S11 or proposed unit LA-10.

Other Comments: The New Orleans District of the Army Corps of Engineers suggested that several developed areas existed in units S10, S11, and LA-10, such as Rutherford Beach, the Mud Lake area, and Johnsons Bayou. Their letter is reprinted under S03 (letter number 1757).

Response: The DOI has carefully examined existing units S10 and S11, their proposed additions, and proposed unit LA-10; no developed areas are included within the recommended boundaries of these units. Rutherford Beach is not included in the delineations of S10. The developed areas of Johnsons Bayou are not included in S11 and the developed areas near Mud Lake (Holly Beach) are not included in LA-10.

DOI Recommendation: The DOI recommends adding new barrier areas and the associated aquatic habitat to existing CBRS units S10 and S11. The DOI also recommends adding LA-10 to the CBRS.