Comments by
National Audubon Society Louisiana Coastal Initiative
on:
U.S. Army Corps of Engineers Draft Atchafalaya Basin Floodway System Project, Louisiana Master Plan
July 19, 2012

National Audubon Society Louisiana Coastal Initiative (Audubon LA) would like to take the opportunity to submit comments on the U.S. Army Corps of Engineers Draft Atchafalaya Basin Floodway System Project, Louisiana Master Plan (herein referred to as the Plan).

General Observations and Recommendations

Review of this document shows that it is not a plan for management of the entire basin, but of the "lands and waters held in project fee ownership and comprehensive easements" within the basin south of Highway 190 and north of Morgan City. Because the U.S. Army Corps of Engineers (USACE) actually manages water input to the entire Floodway and through the Atchafalaya River and Wax Lake Outlet to the Gulf of Mexico, this Plan should address the entire area affected by USACE operations at the Old River Control Structures (ORCS), as true management of this interconnected ecosystem cannot be effective if done in the piecemeal fashion proposed.

Recommendation 1: Expand the plan to include the entire basin affected by the Floodway: from Old River Control Structure to the Gulf of Mexico

Apparently, the Plan is primarily one for managing recreational access. The Plan focuses mainly on developing public access and use of the public lands, including recreation, bird watching, hunting and fishing. Management of the habitat is confined in the Plan to what might be done on public lands to best enhance fish and wildlife resources, while "minimizing adverse impacts to the existing biological and physical environment…within the limits and authority of the Federally-authorized project." (pg ES-2/pdf pg 4) Environmental management as described in the Plan appears to be further limited to resource management for hunting and fishing.

In 2009, Audubon LA contracted the Consensus Building Institute at MIT to conduct an Atchafalaya stakeholder assessment on their views on management of the Atchafalaya Basin (attached). They conducted detailed interviews with 47 opinion leaders from a broad cross-section of Atchafalaya stakeholders. While this diverse stakeholder spectrum differed on many issues, broad consensus exists on the following four (CBI 2010).

1. There is a widely shared commitment to protecting the Atchafalaya Basin.
2. Stakeholders share a long-term view of the Basin's future, and consider its current state with reference to the past.
3. Many groups feel that their current relationship with the Basin has been in some way diminished relative to their historical reference point.
4. Few groups appear entirely satisfied with the way things currently stand.

None of the stakeholders objected in principal to the management of the basin to protect the lower Mississippi Valley from flooding. However, many also denounce the negative secondary effects of the structures (levees, dams, locks and altered flow caused by massive USACE dredging in the 1960s) associated with flood protection operations. The vast majority of stakeholder groups support modifications to improve ecosystem health without sacrificing flood protection or local economic interests.

The primary focus of management in the basin, other than flood control, should be on managing for health and sustainability of the unique ecosystems of the basin. The tradition of procrastination on environmental issues needs to stop, and should be reflected in a new Master Plan for future management. On pg 1-6/pdf pg 27, the Plan notes that in 1968 dredging was curtailed because it had become an environmentally sensitive issue while achieving little in terms of flood protection improvement. In 1972, Congress directed the USACE to "look beyond simple flood control to develop a plan for the management and preservation of the water and land resources of the Atchafalaya River Basin." This was addressed by the USACE with a plan for improving public access. In 1976, the EIS was "returned to the MVN with direction to study both authorized and unauthorized features to address the need for resource preservation and management." This was followed by the purchase of land that would be managed "for the primary purpose of optimizing fish and wildlife productivity and natural beauty." The trend here should be obvious. All calls for addressing environmental issues are answered by access and facilities for utilization of existing resources.

The USACE focus on public access and utilization in the current Plan, while consistent with past practice, seems to again misinterpret Congressional intent that has for decades continued to call for something far more ambitious. In fact, on page 1-14 (pdf page 34) of the Plan itself, the misplaced focus is again highlighted by a statement (emphasis added):

> *"**Based on widespread public support for protection of environmental resources** within the ABFS, the **action proposed was to improve public access** and maximize the public's opportunity to observe and utilize the fish and wildlife resources…"*

To us, this statement appears to be a non-sequitur, rather than a logical interpretation of public input. It does not begin to address the fact that few are satisfied with the current lack of environmental management and degraded ecosystem of the Floodway. Public access is not "protection of environmental resources." Access is nice, but if the environment is not protected, then promising increased access to an increasingly degraded environment does not address the full breadth of ecosystem service that holistic basin-wide management can achieve.

Another main item of concern is the length of time required for authorized action to be implemented. The Supplemental EIS initiated in 2005 is scheduled for release in 2012 – 7 years. The Henderson Lake Water Management Unit was authorized by WRDA 1986 and "remains in the planning stage" in 2012 – 26 years later. This timing is insufficient, and explains another conclusion of the stakeholder analysis cited above, namely

> *Stakeholders generally express frustration with past planning and management efforts in the Basin and agree that inadequate implementation has been an ongoing problem. Although groups express different levels of confidence regarding the potential effectiveness of current efforts in the [State] Atchafalaya Basin Program*

> *there is fairly broad agreement about several key concerns: the lack of clear management objectives, the inappropriate consideration of geographic scale, and the funding challenges that hinder implementation. (CBI 2010).*

Recommendation 2: Shift the primary focus of management from public access to protecting, enhancing, and correcting the environmental health of the Basin, and, very importantly,

Recommendation 3: streamline the process and shorten the time from authorization to implementation to benefit the environment.

The 2007 Water Resources Development Act (WRDA07 Section 7002), directs the USACE to study the division of flow and sediments at the Old River Control Structure (ORCS) so that it can be optimized for ecological benefits. More specifically, it calls for "an investigation and study of the maximum effective use of the water and sediment of the Mississippi and Atchafalaya Rivers for coastal restoration purposes consistent with flood control and navigation" and "an investigation and assessment of alterations in the operation of the ORCS, consistent with flood control and navigation purposes." (This is referenced on pg 1-20/pdf pg 40). Because of adherence solely to 24/7/365 maintenance of the 30 percent latitudinal Mississippi and Red River discharge into the Atchafalaya, and the legacy of USACE altered hydrology within the Floodway, sediment is filling highly valued cypress-tupelo swamps in the Basin while lack of flow through off-channel wetlands is creating stagnant conditions everywhere but in a few main channels. This is reducing the Floodway capacity to convey the Project Flood while threatening habitats that are desperately needed for support of migrating fish, birds and other wildlife, including a number that are threatened or endangered, or experiencing significant population declines throughout the Mississippi valley. Furthermore, the sediment that is stranded in Floodway swamps could be used beneficially elsewhere.

There is potential for improved operation of the Old River Control Structure (ORCS), particularly during low discharge periods when channel stability is not an issue, to yield significant ecosystem benefits within the Basin in terms of flood control, cypress regeneration or preservation, and generally restoring a more natural hydrology to a basin that has serious water quality issues. We recognize that how we manage the Basin can also positively affect the environment on a regional scale, in terms of reducing nitrogen input to the offshore dead zone, coastal wetland creation and protection, freshening of estuaries, and improving coastal sediment retention and deposition. Old River is the largest existing Mississippi River diversion and one that, according to the 2012 Comprehensive Louisiana Coastal Restoration Master Plan recently approved by the Louisiana legislature, to play a larger role in the continuing health of the Basin and the future success of a comprehensive coastal Louisiana restoration (CPRA 2012). Although the State Master Planning effort was developed in cooperation with the USACE over the past two years, it is not clear that the Plan for the Atchafalaya under review here has benefitted from this interaction. This omission should certainly be corrected prior to a final release.

Audubon LA has undertaken development of a hydrodynamic and ecological modeling tool (DHI MIKE 21) to complement the state Atchafalaya Basin Program's Assessment Tool and that provides predictive capacity for recommendations to flow management. The new state of the art 2D hydrodynamic engineering model was successfully calibrated during the record basin flows of 2011, and validated later that same year. Audubon Louisiana and the Moffatt & Nichol

engineering firm collaborated on this effort. Initial modeling efforts have been undertaken to test two potential ecologically improved management regimes: 1) modifying the flow at low water during the summer months by lowering the standard 30% of combined flow to various decreased amounts, and 2) creating a headwater tide by altering the amplitude and period of water flow around the mean of 30% to keep water moving in backwater areas. In August, 2011, the US Army Corps of Engineers and the state of Louisiana approved a cost share agreement that clears the way for a $30 million hydrodynamic study (*Mississippi River Hydrodynamic and Delta Management Study*) of the lower Mississippi River. While this effort does not yet include the Atchafalaya River or Basin, we are collaborating with the state to ensure that a companion effort is, in fact, undertaken. Audubon's Atchafalaya Basin Hydro-model will allow this analysis to extend into the Atchafalaya. We would like to continue to partner with the State and include the USACE on this initiative to make best use of all the tools available for future project design and selection to support better management of the basin.

Recommendation 4: We feel that the Plan should be a blueprint for future projects and proposals that significantly improve the natural functioning of the Basin in more integrated ecological and coastal restoration contexts. This approach can improve the health of the Basin while ensuring that the Atchafalaya plays an increasing role in the restoration of coastal Louisiana.

Recommendation 5: Certainly, the Plan being reviewed here should mention the 2012 State Master Plan and show how it is consistent with the goals and scientific findings of that critical document.

Recommendation 6: We encourage the USACE to review and use the hydro-dynamic model created by Moffatt & Nichol for Audubon LA to shorten the timeline for project planning, and improve stakeholder understanding and support for proposed measures.

Comments and recommendations by Section

Executive Summary

ES-2/pdf pg 4 - lines 10-14
We applaud the successful acquisition of the additional 10,500 acres of fee title lands added to the Indian Bayou Area (line 11 "fee instead of feet"). We prefer land acquisition to environmental easements at this time, because of the uncertainty that previously negotiated USACE easements adequately protect the environment for the long term.

ES-2-3/pdf pg 4-5 – Major Features of the Master Plan update
The paragraph lists 3 focuses of the Plan, but the following descriptions are of public access management and future facilities development. There is no reference to any updates for "enhancing fish and wildlife resources," or "minimizing adverse impacts to the existing biological and physical environment" in the following bullet points.

Comments from NAS

Introduction

1-2/pdf pg 23 – Purpose and Scope
The purpose of an update to the 2000 Master Plan should be to make the plan more useful and relevant to the primary purpose of the authorization. On pg 1-5 the two supporting goals place "retain and restore the unique environmental features of the floodway and maintain or enhance the long-range productivity of the wetlands and woodlands," first, and have more emphasis throughout the document. This goal was apparently degraded to "minimizing adverse impacts on the existing …environment…" (1-2; line 24-26). . On page 1-9 (pdf pg 30), the sidebar lists six goals of the ABFS, and this statement should be included as the foundation of the first paragraph of this section.

1-3/pdf pg 24; beginning line 10
What is meant by "Atchafalaya Basin" needs to be clarified. This seems to be a universal problem at all levels of agency reference. The "Atchafalaya Basin" is popularly considered to be the historical watershed and area of influence of the Atchafalaya River system, from the Mississippi River to the Gulf, between the Mississippi and Teche alluvial banks. The Atchafalaya Floodway or Spillway is the area within the constructed protection levees and includes the lower Atchafalaya River and Wax Lake Outlet deltas.
So, on line 10, is "entire Atchafalaya Basin" the historical basin or the floodway?
Line 20 – please change the reference to "upper Atchafalaya Floodway"
Line22 – please change the reference to "lower Atchafalaya Floodway"
Line 29 – doesn't the floodway require a flowage easement on all lands within its boundary? Please make the difference between flowage easement and environmental easement clear.

1-4/pdf page 25
Line 9 – BDOA is listed as 16,400 acres on pg 7-1/pdf pg 163
Line12 – of approximately 47, 259 acres of 70,000 acres
Line 22 – approximately 15,220 acres
Line 29 – 25,500 acre Attakapas
Line 31 – ownership with 99,759 acres owned by the State of Louisiana
The changes above needed to be made, and the 25,500 acres of Attakapas property added, to add up to the total state lands. These numbers need to be corrected in Table 1.1 as well.

1-4/pdf page 25 – Table 1.1 ABSF Land Ownership
Table 1.1 in the Plan is very confusing and contains errors and omissions that don't add up or match the text on the same page. We suggest a more easily understood arrangement similar to that below:

		Current	Total Current	Total Authorized
US Fee Title Lands	IBA	28,500	47,259	70,000
	BDOA	16,400		
	SBA	2,359		
US Fish & Wildlife	Sherburne	15,220	15,220	
State of LA	Sherburne	11,780	37,280	
	Attakapas	25,500		
Total public lands		99,759		
US environmental easements on private land (including 59,000 acres for flowage easements)		144,000	144,000	367,000
Private land with no environmental easements		301,000	301,000	

1-8 /pdf pg 29 starting line35
We agree with all of the recommendations of the ABFS Feasibility Study of 1982, and would like to see them implemented in full and form the foundation of the Plan, rather than have the Plan focused exclusively on public access and recreational development. The sidebar on this page that eloquently states the goals of the ABFS, should actually be reflected in the goals of the future Plan.

1-17/pdf pg 37 beginning line23
We are pleased to see that work on Buffalo Cove was begun in 2004 (8 years ago), and feel that funding for easement acquisition should be of high priority so that this project can be completed while there is still something there to save.

1-18/pg 38 – 1.3.8.2 Recreational Development Feature
We feel that the USACE is doing a superb job of providing public access and recreational facilities in the Basin. This is a very important aspect of management of the basin, as it increases public participation and interest, and can draw nationwide attention and tourism to Louisiana's unique natural heritage. However, this should not be considered the primary goal of the Master Plan. We would like to see this level of focus continued, but, in order to accomplish Congressional intent, that goal must be matched or exceeded by a focus on preserving and enhancing the natural environment so that visitors can see the improvement, rather than continued degradation.

1-18/ pdf pg 137 – 1.3.9 East Grand Lake Study
Moffat & Nichol developed a hydro-dynamic model of the Atchafalaya Basin for National Audubon Society Louisiana that could be used in this supplemental study. There is no evidence that the Plan under review has benefitted from any quantitative assessment of basin hydrology, or the connection between hydrology and the ecosystem.

Description and Management of the ABFS

3-1/pdf pg 111 – 3.1.1.1 WRDA 2007
Line 35 – Section 315 of WRDA 2000
Line 39 – Section 3075 (c) of WRDA 2007 amended the authorization to consider…
Note: Section 3076 of WRDA 2007 establishes a regional visitor center in Morgan City
Please include: Section 7002 (e) WRDA 2007 – "In developing the comprehensive plan, the Secretary shall consider the advisability of integrating into the program …(1) an investigation and study of the maximum effective use of the water and sediment of the Mississippi and Atchafalaya rivers for coastal restoration purposes…(3) an investigation and assessment of alterations in the operation of the Old River Control Structure, consistent with flood control and navigation purposes;" Then, it would be appropriate to explain the steps being taken to ensure that Congressional intent is, in fact, being expeditiously executed.

3-9/pdf pg 119 starting line 25 – breakdown of total acreage
How do these numbers fit into Table 1.1?
If existing public lands and water-bottoms equals 150,000 acres and the total land is 99,759 acres from the table, then the total public water-bottoms equals 50,241 acres?
Where do the DOW land donations fit into the table? Where are they on the maps?
"not part of the authorized AFBS project" lacks clarity. Why are they included in this section?

3-10/pdf pg 120 line 34. "USACE is proceeding with the purchase, from willing sellers, of 70,000 acres of privately owned lands…" Shouldn't this read "USACE is proceeding with the purchase of the remaining 22,731 acres, of the 70,000 acres authorized, of privately owned lands…"

3-10/pdf 120 line 39
"Real property interests acquired to date are shown on a map in Appendix C, Figure 2.

3-11/pdf pg121 line 36-38
"This plan fully recognizes their [flood control and navigation features] importance and the overriding control and effect they have on the entire Atchafalaya Basin." How is this recognized in the plan? WRDA 2007 directs the USACE to study the division of flow and sediments at the Old River Control Structure (ORCS) so that it can be optimized for ecological benefits. Where is this directive being addressed?

Resources of the ABFS Project Area

2-13/pdf pg 59 – 2.1.6.2 Birds
Please consider the following as a replacement for the text of this section or integrate it in some way:

The Atchafalaya Basin Important Bird Area contains the largest remaining bottomland hardwood-cypress tupelo swamp forest in the United States and is considered an Important Bird Area (IBA). IBAs are a designation of BirdLife International, for whom the U.S. partner is the National Audubon Society. (http://iba.audubon.org/iba/profileReport.do?siteId=3015) IBAs are sites whose habitats support a significant proportion of the global, continental, or state

population of one or many species of birds. Global IBAs support at least one percent of the global population of a bird species simultaneously or more than five percent across a season. Continental IBAs support the same percentages of a species' continental population. These important sites support rare, declining, or even common birds during any or all parts of a species' life cycle.

Many globally significant concentrations of waterbirds use the Atchafalaya Basin IBA during part of their life cycle. Those for which data are sufficient to meet the global criteria include Snow Goose, Wood Stork, Neotropic Cormorant, Anhinga, Great Blue Heron, Great Egret, Snowy Egret, Little Blue Heron, White Ibis, and Roseate Spoonbill. Many of these species nest in the numerous wading bird rookeries in the Basin. Many other waterbirds that are not counted effectively by the standard waterbird colony protocol are also supported in tremendous numbers. For example, Yellow-crowned Night-Herons breed in large numbers in the cypress-tupelo swamps. The Near-threatened Painted Bunting, one of the most brilliantly-colored North American birds, is present in numbers that are globally significant.

Several species are documented to have continentally significant populations in the Atchafalaya Basin, including Bald Eagle, American Woodcock, and Prothonotary Warbler. More species certainly are supported at these levels, also, but, given current survey techniques, the data are lacking to trigger IBA criteria for most smaller, dispersed birds such as the Neotropical migrants. However, surveys have shown that the Atchafalaya Basin also provides valuable stopover habitat for Neo-tropical migrants, including many species of thrushes, vireos, flycatchers, warblers, buntings, and tanagers.

Bald Eagle populations have been increasing in the Atchafalaya Basin IBA for the past several years. They tend to nest in tall, older cypress trees. The Basin also supports many other birds of prey including forest inhabitants such as the Red-shouldered Hawk, Broad-winged Hawk, and Cooper's Hawk, Mississippi and Swallow-tailed Kites, Osprey, Barred, Great Horned, and Eastern Screech-Owls, American Kestrels, Merlin, and the occasional Peregrine Falcon and Northern Harrier.

The Atchafalaya Basin is renowned for hunting, including hunting of game birds. It is world-famous for the numbers of American Woodcock resident in the Basin, which is central in the range of the bird. There are tens of thousands of American Woodcock that winter in the damp, brushy woods of the Basin. It is also a well-known location for hunting Wild Turkey, which are abundant in the forests. Wintering waterfowl are common in any impounded areas, as are Wood Ducks, teal, and other species in the swamp forests, and waterfowl hunting is popular in the Basin.

The site provides important breeding habitat for several Audubon WatchList species including Prothonotary, Kentucky, and Swainson's Warblers, Wood Thrush, and Painted Bunting, and common birds such as Summer Tanager, Indigo Bunting, Great Crested Flycatcher, Tufted Titmouse, Carolina Chickadee, and Carolina Wren. Over 30 species of rails and shorebirds have been found in the wetland habitats in the basin. During the winter migratory waterfowl species are present.

Several events occur each year to draw visitors into the Atchafalaya Basin to bird-watch, including the Neotropical Migratory Songbird Tour during Step Outside Day in May, Wood

Stork Festival in July, and Eagle Expo in Morgan City in February. While the Atchafalaya Basin supports globally important concentrations of several species of birds, and continentally important populations of many others, there is little effort to publicize these tremendous concentrations of birds to those outside of the birding community in Louisiana. Rare and charismatic species including Wood Stork, Swallow-tailed Kite, Painted Bunting, and Roseate Spoonbill, and species limited to a primarily southern distribution, such as Swainson's Warbler, Tricolored Heron, and Mississippi Kite, would draw birders from many of our U.S. states, as well as world-wide, given the appropriate outreach throughout the global ecotourism community. The Yellow Rails and Rice Festival in the Coastal Prairie in Louisiana is an example of a successful attempt to increase ecotourism in Louisiana through birds, having attracted visitors from many different countries in 2011, its third year of operation. Any true attempt to increase public access into the Basin should also focus on increasing ecotourism to see the Basin's world-class bird diversity and abundance, as well as increasing safe access for birders in all seasons.

Factors Influencing and Constraining Resource Use, Development and Management

4-3/pdf pg 137 –ABFS Project, Feature Constraints
We understand the complexities involved in implementation of projects to alter and hopefully benefit environmental conditions. Federal redtape and entangling requirements are legendary. However, we feel that a specific group should be established for each project whose main purpose is to focus on working through the constraining factors to streamline or at least keep the process moving within a reasonable time-frame. Seven or more years from planning to implementation is inefficient for economic reasons and because of degrading environmental conditions.

4-5/pdf pg 139 – 4.2.2.2 Timber Harvest Management
Line 23 – "The environmental protection easement of the ABFS does not require landowners to inform the USACE of their intent to conduct a timber operation on protection easement lands." On page 10-1/pdf pg 239, the multipurpose easement on line 31 includes "Environmental protection rights…" and on the following page states that it "prevents the conversion or development of easement lands from existing uses." (line 8). What does the environmental easement protect if not the habitat that includes timber? How could timber harvest not "prevent the conversion from existing uses"?

Environmental easements should include a provision for much more limited timber harvest than in previous negotiated easements, as these are not considered protective of the environment.

Through the Coastal Forest Conservation Initiative of CIAP, there is a precedent for conservation easements in Louisiana to significantly restrict the harvest of timber, in order to improve forest health, provide ecological value, protect ecological integrity, and provide storm damage reduction function. This provision is included in a program to protect coastal forests because of the recognition that, as forests are allowed to mature and develop uneven age structure, they provide significant benefit to the citizens of Louisiana. In addition, they also provide enhanced wildlife value. As trees age and decay, they provide cavities for many cavity-nesting bird species including American Kestrel, Red-headed Woodpecker, Red-bellied Woodpecker, Yellow-bellied Sapsucker, Downy Woodpecker, Hairy Woodpecker, Northern Flicker, Pileated

Woodpecker, Great-crested Flycatcher, Carolina Chickadee, and Eastern Tufted Titmouse as well as Wood Duck, a species of economic importance. Older, hollow trees provide den sites for the endangered Louisiana Black Bear and prime nesting and roosting habitat for Chimney Swifts. Emergent canopy trees are preferred nest sites of the Audubon WatchList Swallow-tailed Kite, and large trees provide suitable nest sites for species that build large nests, such as the Bald Eagle.

4-7/pdf pg 141 – 4.2.4.1 - Land Acquisition
We agree in principal with the discussion on land acquisition. Tracts contiguous with existing areas or tracts that provide access to disconnected areas are highly desired. We would like to add our voice to weighting future purchases for large or specific tracts of bald cypress-tupelo gum swamp that are representative and characteristic of a special and unique habitat of the Basin. It is preferable to purchase these tracts while the habitat still exists rather than trying to reforest the swamp area that takes over 100 years to mature.

4-8/pdf pg 142 – 4.2.4.3 – Forest/Vegetative Cover
Timber management discussions throughout the document overlook the threat posed by the invasive Chinese tallow tree. Artificial clearings are more likely to be recolonized by the tallow than the more wildlife friendly native trees, and will eventually transform huge areas of the forests into monotypic tracts rather than the diverse mature forest types we see now if this serious situation is not addressed.

Control of invasive species is not addressed as a management issue anywhere in the Plan, although it is a serious issue on the land as well as the water. Not only tallow trees, but Asian carp, water hyacinth, giant salvinia and many other species threaten the environmental health of the basin. This needs to be added as a specific management issue, with possible control techniques.

4-10/pdf pg 144 – Oil and Gas Activities
Use of Best Management Practices (BMPs) specifically developed for the unique nature of the Floodway should be highly encouraged and mitigation activities required. In general, we are extremely dissatisfied with the current enforcement by the USACE and State of Louisiana of permit restrictions and violations of environmental easement provisions within the Floodway. The Plan under review does not appear to address anything beyond enforcement of fish and game laws. It has been pointed out that the USACE New Orleans District has only two field personnel dedicated to inspection and compliance with respect to wetland permitting. These agents have been systematically deprived of logistical capacity (boats) to get into the field. Enforcement of permit restrictions is necessary and must be urgently upgraded so that scofflaw activity is penalized with enough certainty to change behavior. Respect for the law must be reinstated in the Floodway as a pre-requisite for any future improvement.

Water Management Units

12-3/pdf pg 262 – Goals of WMUs
We are pleased to see the shift in goals of the water management units from active to passive water management that will prolong the life expectancy of productive habitat. It is disappointing and potentially devastating that this new concept in management of the WMUs remains

unscheduled and unfunded, particularly since the state is in full support and poised for implementation.

Thank you for considering our suggestions and concerns, and we look forward to working with you on recreation and conservation measures in the Atchafalaya Basin Floodway.

G. Paul Kemp, Vice-President
National Audubon Society
Audubon Louisiana
6160 Perkins Rd, Ste 215
Baton Rouge, LA 70808
(225) 768-0820 Phone
pkemp@audubon.org

Karen A Westphal
Atchafalaya Basin Program Manager
National Audubon Society
Audubon Louisiana
(225) 768-0921
kwestphal@audubon.org

www.la.audubon.org

Douglas J. Meffert
Executive Director/Vice-President
Audubon Louisiana/National Audubon Society
225-768-0820 Phone
dmeffert@audubon.org