Cmts on FOA cmts to USACE Atchafalaya Basin Master Plan Update, July 16, 2012

1.2 Purpose and Scope

**Excellent to quote NEPA, CWA and LA State Constitution as bases in law for Corps to pursue more aggressively the supporting goals articulated in the 1982 feasibility report.**

6.1.2 Land Allocation System, Comments page 18

Mitigation. Land acquired or designated in accordance with authorizing documents to offset losses

associated with development of the project. There are no mitigation lands required by this project. Some lands have been used for mitigation planting to offset provisions of a Section 404 permit, but those actions are not directly related to this project.”

Recommendation: Even though there are no mitigation lands required by this project, mitigation has

been required of Project Partners who have attempted to move ahead on projects approved by the

Corps but not executed because of funding or other priorities. Removal of these obstacles would be a

significant step forward in stimulating cooperation and promoting the idea that the Corps is really interested in improving water quality and ecosystem health in non-channelized areas.

**Your comment including the words “Removal of these obstacles” could be misinterpreted in the context of the political controversy raised by some who treat the Modified Charleston Method of mitigation calculation itself as an “obstacle” to be removed. Better to just say exactly what you propose here. I think you are proposing higher priority for funding and institutional support for mitigation to the appropriate standard. But I am not sure what you mean here so maybe better to just say it.**

7.4.6 Aesthetics, comments pages 19-20

[PDF page 187, line 36]

“Some habitat management treatments, however necessary to achieve management goals, may be

viewed by some members of the general public as offensive. Some treatments impact the aesthetic

qualities of the forest more than others, and different people look upon the results of these practices

differently. ‘Aesthetic standards vary among men. Some will be disturbed by any harvest of mature

timber, rejecting arguments that the trees are likely to be blown down or to succumb to insects or

disease within a few years in any event. Others will be less disturbed, or not disturbed at all, by the

site of the harvested area; they will find a newly established and thriftily-growing forest aesthetically

more pleasing than the old one, which in their eyes had passed its prime.’”

[Comment: The statement “Aesthetic standards vary among men.” is technically incorrect. After the

passage of the National Environmental Policy Act in 1969, aesthetic research was stimulated and it was

determined that aesthetics is a measurable item. One of the processes used to come to this conclusion

was giving a set of landscape photographs to a group of aesthetically educated people who were asked

to arrange the photos from most attractive to least attractive. The photos were then handed to random

collections of the general public without an education in aesthetics. The general public put the photos in

the same order as those with aesthetic training. At that point the photographs were analyzed in relationship to the art elements of line, form, color, texture, and the art principles of unity, rhythm, balance,

etc. An individual can have his or her own values, but there is a general consensus as to what is beauty.

The forestry example does not relate to aesthetics but to personal concerns. The USDA Forest Service

Visual Management Procedure can direct aesthetically trained personnel to mitigate aesthetic losses

with the removal of trees. Trees and art are the same as talking about apples and oranges.]July 15, 2012 - USACE ABFS Master Plan - FOA Comments charlesc@basinbuddies.org page 20

[PDF page 188, line 1]

[Comment: Age of forest trees have no relationship to aesthetics, but it does have an importance to ecology. Age diversity is an element of environmental complexity. One ecological principle is that a complex environment is a stable environment – complexity leads to stability.]

**Your comment about age diversity is correct but I think should be stronger in defense of allowing old growth forest to mature and enter conversion to forest base organic material on its own. Old growth begets new growth if given a chance. This adds a hugely important reason to leave old growth alone, beyond just the aesthetic consideration.**

1.3.2 The Feasibility Study and Final EIS, pages 4-5

Much has been written about the negative effects of sediment introduction along with water into the

swamps. It is our contention that the progression of coastal wetlands from marsh, through swamp, to bottomland hardwood forest is a natural one, and that the most important requirement is that the progression produce healthy ecosystems along the way. This cannot be achieved by starving wetlands of

oxygen-carrying fresh water. Periodic replenishment and rejuvenation is a required condition for a

healthy wetland ecosystem.]

**I think we can agree that the progression from marsh through swamp to bottomland hardwood forest is a natural one but the process is greatly accelerated by mismanagement of sediments in the basin. I think we want to discourage construction of east/west flowage that tends to result in sediment deposition. Rather we should encourage construction and clearing for north/south flow through the basin that tends to encourage flow through of sediments. If you must mention this progression I think your comments should distinguish the natural process from the accelerated process that is aided by sediment mismanagement or lack of good sediment management. As currently worded this could be interpreted as a license to deposit sediment anywhere on the excuse that it is aiding a natural process.**