



United States Department of the Interior



FISH AND WILDLIFE SERVICE
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June 7, 2012

Dr. John D. Foret
Wetland Ecologist
National Marine Fisheries Service
National Oceanic and Atmospheric Administration
646 Cajundome Boulevard
Lafayette, Louisiana 70506

Dear Dr. Foret:

Please reference your May 31, 2012, letter requesting our concurrence with the National Marine Fisheries Service's (NMFS) determination that the proposed Chenier Ronquille Barrier Island Restoration Project in Plaquemines Parish, Louisiana, is not likely to adversely affect the threatened piping plover (*Charadrius melodus*). That project has been authorized by the Coastal Wetlands Planning, Protection, and Restoration Act (CWPPRA) (104 Stat. 4779; 16 U.S.C. 3951 et seq.). The Fish and Wildlife Service (Service) has reviewed the information provided and offers the following comments in accordance with provisions of the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

In Louisiana, barrier island and barrier headland erosion is attributable to increasing tidal prism, insufficient volumes of sediment supplied by littoral currents, land subsidence, and sea-level rise (Boesch 1982). Although increases in the tidal prism may be primarily responsible for enlargement of tidal passes, the insufficient supply of sand available to rebuild eroded areas has also contributed to increased tidal pass widths and shoreline retreat (Louisiana Coastal Wetlands Conservation and Restoration Task Force and the Wetlands Conservation and Restoration Authority 1999). Where insufficient supplies of sand prevail, measures to maximize sand retention, such as sand fencing and vegetative planting, are needed to effectively rebuild and maintain these eroded areas.

Chenier Ronquille is the western-most portion of the Chaland barrier headland, which is a principal feature of the Barataria barrier system. The headland maintains the integrity of the Gulf shoreline and helps protect interior coastal wetlands from further deterioration. At one time, the Chaland headland consisted of narrow and low-lying sand dunes and beach berm, barrier marshes, chenier ridges interspersed with mangrove thickets, coastal dune shrub thickets, lagoons, and small bayous. The headland has historically suffered loss of habitat value and diminished function due to storm overtopping and breaching, saltwater intrusion, wind and wave induced erosion, sea level rise, subsidence, and man-made structures. The observed average shoreline erosion rate along the Chaland headland has increased from 32 feet per year (1998-

2006) to approximately 58 feet per year (2006-2010), and increased stress on fish and wildlife in the area is expected as habitats continue to be lost. Based upon the information and photographs provided in your letter, Chenier Ronquille currently consists of eroding and fragmented shoreline, low elevation saline marsh (+1 foot North American Vertical Datum 1988 (NAVD88)), and sparse supratidal mangrove habitat. The proposed project area is highly susceptible to over-wash and conversion of land to open water. Because there is little available sediment within the system, the NMFS anticipates that without the proposed project the headland would erode below sea level in 18 years. Thus, NMFS' goal is to repair and reestablish an intact and diverse headland habitat. The NMFS has previously restored two sections of the headland: the Chaland Headland Restoration Project was completed in 2006 and the Bay Joe Wise Restoration project was completed in 2009. Chenier Ronquille is the last section of the headland to be restored.

The NMFS is proposing to restore 80 acres of beach and dune habitat and 274 acres of intertidal saline marsh along Chenier Ronquille to increase the longevity of the headland system for the next 20 years. Approximately 2.7 million cubic yards of material would be mined from an offshore borrow source and hydraulically placed along 8,000 linear feet of shoreline to reconstruct the barrier headland and reduce shoreline erosion. Construction of the dune and beach portion of the project would involve surveying, disposing dredged material on the beach, grading the sand fill, installing sand fences, and planting native dune vegetation. Construction of the bay-side marsh would involve disposing dredged material onto existing marsh and into open water, as well as minor vegetative planting to start marsh growth. The NMFS anticipates that construction would require approximately 12 months. The proposed restoration efforts would not prevent over-wash during storm events or require repair of future breaches over the 20-year project life.

As you know, piping plovers winter in Louisiana, and may be present for 8 to 10 months. They arrive from the breeding grounds as early as late July and remain until late March or April. Piping plovers feed extensively on intertidal beaches, mudflats, sand flats, algal flats, and wash-over passes with no or very sparse emergent vegetation; they also require unvegetated or sparsely vegetated areas for roosting. Roosting areas may have debris, detritus, or micro-topographic relief offering refuge to plovers from high winds and cold weather. In most areas, wintering piping plovers are dependent on a mosaic of sites distributed throughout the landscape, because the suitability of a particular site for foraging or roosting is dependent on local weather and tidal conditions. Plovers move among sites as environmental conditions change, and studies have indicated that they generally remain within a 2-mile area. Major threats to this species include the loss and degradation of habitat due to development, disturbance by humans and pets, and predation. While critical habitat has been designated in areas of coastal Louisiana, none occurs within the project area; therefore, no critical habitat would be affected by the proposed project.

The project area still provides some foraging habitat for piping plovers on remnant patches of intertidal beach, over-wash fans, or sand or mud flats exposed during seasonally low tides; however, little to no roosting habitat (i.e., unvegetated or sparsely vegetated beach above high tide) exists within the project area due to the low elevations of the remaining sandy areas. Due to the current habitat conditions, it is difficult to assess the amount of foraging habitat that may be available for piping plovers during the wintering season. The Louisiana Department of

Wildlife and Fisheries' (LDWF) 2010 winter survey data indicated that six piping plovers were observed along an over-wash fan in the project area, as well as restored habitat on the eastern end of the Chaland headland. Unfortunately, due to the remoteness of the Chaland headland, we have no additional data (past or current) that indicates regular usage of the area.

The proposed activities would likely occur while piping plovers are present in the project area. Potential project effects to the piping plover would consist of temporary displacement to nearby suitable habitats and temporary loss of benthic prey species within the project footprint. There is an abundance of nearby suitable habitat into which plovers can disperse, including the remainder of the Chaland headland, the Grand Terre Islands and Grand Isle to the west, and Shell Island to the east. The benthic prey species smothered by the additional sediment in the project area would naturally re-colonize the area within 6 months to 2 years post-construction. Piping plovers would not be permanently excluded from the project area and would not be displaced beyond their normal daily movement patterns for foraging and roosting due to the abundance of suitable habitat in nearby areas. Implementation of the proposed project would ultimately benefit the piping plover by increasing, restoring, and prolonging the existence of suitable habitat for piping plovers. Because construction effects are temporary, discountable, and insignificant in nature, the Service concurs with the NMFS' determination that the proposed action is not likely to adversely affect the piping plover.

No further ESA consultation with the Service is necessary for the proposed action, unless there are significant changes in the scope or location of the project or the project has not been initiated one year from the date of this letter. If the proposed project has not been initiated within one year, follow-up consultation should be accomplished with the Service prior to making expenditures because our threatened and endangered species information is updated annually.

We appreciate the NMFS' continued excellent coordination and cooperation in the conservation of threatened species and their habitat. If you require further assistance regarding ESA coordination, or have questions regarding the content of this letter, please contact Ms. Brigitte Firmin (337/291-3108) of this office.

Sincerely,



for Jeffrey D. Weller
Supervisor

Louisiana Ecological Services Office

cc: FWS, Panama City, FL (Attn: Patty Kelly)
COE, Regulatory Branch, New Orleans, LA (Attn: Robert Tewis)
LDWF, Natural Heritage Program, Baton Rouge, LA (Attn: Michael Seymour)

Literature Cited

Boesch, D. F., ed. 1982. Proceedings of the conference on coastal erosion and wetland modification in Louisiana: causes, consequences, and options. U.S. Fish and Wildlife Service, Biological Services Program, Washington, D.C. FWS/OBS-82/59. 256 pp.

Louisiana Coastal Wetlands Conservation and Restoration Task Force and the Wetlands Conservation and Restoration Authority. 1999. Coast 2050: toward a sustainable coastal Louisiana, the appendices. Appendix E - region 3 supplemental information. Louisiana Department of Natural Resources. Baton Rouge, LA. 173 pp.