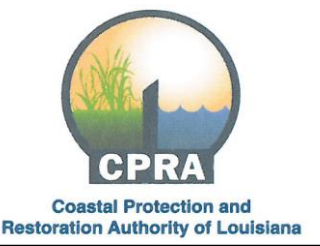**Project:** BS-0038, Breton Landbridge Marsh Creation (West) River aux Chenes to Grand Lake
Dated 7/9/2021
Task: 30% Design Review
Reviewer: Jessica Diez, Alex Holston, Kazi Sadid

State of Louisiana

CPRA
Coastal Protection and
Restoration Authority of Louisiana

Comment No.	Document	Section	Electronic File Page Number	Reference	Comment Date	Comment	Comment Type	Commentator	Evaluator	Evaluation	Comment Date	Comment	CPRA Action	Comment Date	Further Response
1	30% Design Report				7/13/2021	Project has a significant number of landowners (157). This appears to present a substantial barrier to obtaining land rights for the project.	Critical	EPA	JD	Non-concur	7/23/2021	Yes, there are 157 undivided landowners with 37 privately owned parcels. We will need to get landowner agreements with these landowners for construction. Additionally, Delacroix Corporation is the largest landowner in the project area and we've engaged with them several times and have obtained their concurrence with the project and expect them to sign agreements. They own ~46% of the land in the project area and are in support of the project. Typically, when there are a large number of landowners on a project, we shoot for a percentage of the total to sign – somewhere around 70% of all landowners. Some people are hard to get in touch with and track down and some people just don't want to sign. With Delacroix's concurrence, we're already halfway there.			
2	30% Design Report				7/13/2021	Project design features include a lake dike with external borrow used to create the dike. Is this a constructibility issue (equipment reach) with the toe of the dike at least 25 feet away from the edge of the lake borrow pit and the top width of the lake dike at 60 feet?	Critical	EPA	AH	For Information Only	7/26/2021	BS-16 had a similar feature along Lake Lery, so the equipment used there was able to construct a feature of this size. However, the 60 ft crown width design does put the total width near the limit of equipment reach, so the design of the lake dike will be re-evaluated for the 95% design.			
3	30% Design Report				7/13/2021	The use of external borrow materials to construct the lake dike is a concern. The lake dike borrow pit is to be dredged to -10 feet. Unlike dredged access, there is not material available to refill the deep hole created in front of the marsh creation area.	Critical	EPA	AH	Non-concur	8/11/2021	The impacts from this lake dike borrow area are expected to be minimal. This is a relatively small borrow area not expected to impact the lake dike. The dimensions given in the plans are the maximum allowed, the construction will not use the entire borrow area. Also, we conducted a wave modeling study that modeled the dimension of the Grand Lake borrow area in addition to the anticipated external lake dike borrow area. There were no impacts to wave action seen during the study. Additionally, the geotechnical analysis has not shown negative impacts for stability of the dike using this external borrow.			
4	30% Design Report				7/13/2021	What other borrow sources were considered in lieu of Grand Lake? Continued use of lake borrow materials is not a sustainable sediment source.	Critical	EPA	JD	For Information Only	7/23/2021	Other borrow sources that were considered early on in planning were: Horsepower Canal (distance of 7.6 miles), Spanish Lake (distance of 6.13 miles), Lost Lake (distance of 6.3 miles) and Lake Lery (distance of 8.2 miles). Grand Lake has a maximum distance of 2.02 miles from the farthest project extent and has adequate material for the project needs. All alternatives were significantly farther away from the project area, would be costlier, would have multiple pipeline crossings, or would have landowner hurdles to overcome. There are no other projects borrowing from Grand Lake and no other proposed projects overlapping this borrow area. BS-38 is the first project using the Grand Lake borrow source. Other projects proposing Grand Lake borrow are still under development. The wave modeling analysis that was conducted looked at the scenarios of dredging this particular borrow area and dredging the entire lake and the results showed no impacts from either. Additionally, regional sediment management was considered for this area of the basin as determined that Grand Lake borrow would not be an issue.			
5	30% Design Report				7/13/2021	What influence will the Mid-Breton sediment diversion have on this project?	General	EPA	AH	For Information Only	8/1/2021	The results of the modeling of the Mid-Breton Diversion show that the sediment is mainly going to be impacting areas around the outfall area of the diversion. We do expect that fine sediments will work their way through the system and there could be some trapping of fine sediments on the lake side of the marsh creation areas. So there will be some beneficial outcomes of the diversion on the lake side of this project.			
6	30% Design Drawings				7/13/2021	The black triangle for magnetic anomalies is not reflected on the plan legends.	General	EPA	AH	Concur	7/26/2021	This will be updated for the 95% design drawings.			
7	30% Design Drawings				7/13/2021	I did not see the location for the ISPs noted on the plan set. They may be there, but I did not see them.	General	EPA	AH	Concur	7/27/2021	The locations of settlement plates were not given for the 30% design, but those will be added to the 95% design drawings.			
8	Cost Estimate				7/13/2021	Does not appear that the $2M listed for Mob/demob is consistent with their supporting data which suggests $2.9M.	Critical	EPA	AH	Concur	8/11/2021	The mob/demob cost of $2 million was selected considering the Phase 0 estimate and costs from TE-0138, BA-0125, and CS-0054, along with the $2.9 million from the Dredge Mob Estimator in the PPL31 Cost Estimate template. This value will be reassessed in the 95% design.			
9	Cost Estimate				7/13/2021	The unit rate for dredging seems conservatively high for such a short distance. If the data supports that, then fine.	Critical	EPA	AH	For Information Only	8/9/2021	This will be reassessed in the 95% design.			
10	30% Design Report		General		7/22/2021	Figure 1 shows Phase 0 MCAs are MCAs 1 thru 4, but Figures 7, 20, 21, 22, and 25 include MCAs 5 thru 7 as part of Phase 0. Were MCAs 5-7 part of Phase 0 or not? If they were part of Phase 0, then what was the percent change in number of acres benefits from removing them, and will this require a scope change?	General	NRCS	AH	For Information Only	7/27/2021	The Phase 0 project included MCAs 1 - 4. MCAs 5 - 7 were considered as Phase 0 alternates. The figures and language in the 95% design will be updated to clarify this distinction.			
11	30% Design Report		Page 14		7/22/2021	Was the Water data from 2015-2020 brought to 2023 in order to add the ERSL and how was this calculated?	General	NRCS	AH	Concur	8/9/2021	This will be corrected in the 95% report. The values entered under "2023 marsh elevations" in Table 3 were 2020 elevations (about 0.062 ft lower than 2023). The values under "2043 marsh elevations" here (and throughout the report) and Y0 elevations used elsewhere (figures) are correct.			
12	30% Design Report		Page 16		7/22/2021	Section 4.1 - Why was Geoid 18 not used? Will the project be updated to the current geoid in design?	General	NRCS	KS	For Information Only	8/10/2021	This project is part of restoration goal for the Breton Sound Basin that will re-establish a robust landmass between River aux Chenes and Bayou Terre aux Boeufs. Geoid 12B is being used in other projects that are part of this goal and currently in E&D such as BS-32 Mid Breton Land Bridge, BS-37 East Delacroix MC projects. BS-38 will continue to use the same geoid for consistency and exchanging information.			
13	30% Design Report		Page 21		7/22/2021	Section 4.7 - How will access Dredgeing be handled around identified or potential Pipelines?	General	NRCS	KS	For Information Only	8/10/2021	The contractor shall perform pre-construction survey in the project area prior to installation of any dredge pipeline and equipment access to identify existing pipelines. All equipment access corridor/access dredging shall maintain a minimum of 100 ft distance from the identified pipeline as per the specification.			