



United States Department of the Interior


FISH AND WILDLIFE SERVICE
200 Dulles Drive
Lafayette, Louisiana 70506



February 12, 2019

Memorandum

To: Deputy *Deepwater Horizon* Department of the Interior Natural Resource Damage Assessment and Restoration (NRDAR) Case Manager

From: Field Supervisor, Louisiana Ecological Services Office 

Subject: Informal Consultation for the Proposed *Louisiana Trustee implementation Group Draft Restoration Plan/Environmental Assessment #1.1: Queen Bess Island Restoration Project in Louisiana*

Please reference your November 13, 2018, memorandum requesting our review of the subject project that would be implemented in Louisiana by the Deepwater Horizon NRDAR Louisiana Trustee Implementation Group (LA TIG). The LA TIG has evaluated this project as a potential restoration project to restore natural resources in Louisiana that were injured as a result of the *Deepwater Horizon (DWH)* oil spill. The Fish and Wildlife Service (Service), Louisiana Ecological Services Office has reviewed the information provided and offers the following comments in accordance with the Endangered Species Act (ESA) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

Your office provided a revised Biological Evaluation form on February 5, 2019, addressing the potential effects, conservation measures, and justifications and requested our concurrence with your determination of effects on federally listed threatened and endangered species in Louisiana under the Service's jurisdiction. The proposed Queen Bess Island Restoration Project is located approximately 2.5 miles northeast of Grand Isle in Jefferson Parish, Louisiana, and proposes to restore the only brown pelican rookery in the Barataria Basin.

West Indian Manatee

The proposed project would be located in an area where the federally threatened West Indian manatee (*Trichechus manatus*) may occur. The West Indian manatee is known to regularly occur in Lakes Pontchartrain and Maurepas and their associated coastal waters and streams. It also can be found less regularly in other Louisiana coastal areas, most likely while the average water temperature is warm. Based on data maintained by the Louisiana Natural Heritage Program (LNHP), over 80 percent of reported manatee sightings (1999-2011) in Louisiana have occurred from the months of June through December. Manatee occurrences in Louisiana appear to be increasing and they have been regularly reported in the Amite, Blind, Tchefuncte, and

Tickfaw Rivers, and in canals within the adjacent coastal marshes of southeastern Louisiana. Manatees may also infrequently be observed in the Mississippi River and coastal areas of southwestern Louisiana. Cold weather and outbreaks of red tide may adversely affect these animals. However, human activity is the primary cause for declines in species number due to collisions with boats and barges, entrapment in flood control structures, poaching, habitat loss, and pollution.

According to the BE, water quality best management practices and standard West Indian manatee protection measures would be employed to avoid and minimize impacts to water quality and benthic environments and to minimize potential interactions with manatee. Based on the above information, the Service's Louisiana Ecological Services Office concurs with your determination that implementation of the proposed action is not likely to adversely affect the West Indian manatee.

Piping Plover and Red Knot

Portions of the proposed project area provide suitable habitat for the federally threatened piping plover (*Charadrius melodus*); however, the proposed project area is not within piping plover designated critical habitat. The piping plover is a small (7 inches long), pale, sand-colored shorebird that winters in coastal Louisiana and may be present for 8 to 10 months annually. Piping plovers arrive from their northern breeding grounds as early as late July and remain until late March or April. They feed on polychaete marine worms, various crustaceans, insects and their larvae, and bivalve mollusks that they peck from the top of or just beneath the sand. Piping plovers forage on intertidal beaches, mudflats, sand flats, algal flats, and wash-over passes with no or very sparse emergent vegetation. They roost in unvegetated or sparsely vegetated areas, which may have debris, detritus, or micro-topographic relief offering refuge to plovers from high winds and cold weather. They also forage and roost in wrack (e.g., seaweed or other marine vegetation) deposited on beaches. 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.

The federally threatened red knot (*Calidris canutus rufa*) is a medium-sized shorebird about 9 to 11 inches in length with a disproportionately small head, small eyes, short neck, and short legs. The black bill tapers steadily from a relatively thick base to a relatively fine tip; bill length is not much longer than head length. The legs are typically dark gray to black but are sometimes greenish in juveniles or older birds in non-breeding plumage. Non-breeding plumage is dusky gray above and whitish below. The red knot breeds in the central Canadian arctic but is found in Louisiana during spring and fall migrations and the winter months (generally September through May). During migration and on their wintering grounds, red knots forage along sandy beaches, tidal mudflats, salt marshes, and peat banks. Observations along the Texas coast indicate that red knots forage on beaches, oyster reefs, and exposed bay bottoms, and they roost on high sand flats, reefs, and other sites protected from high tides. In wintering and migration habitats, red knots commonly forage on bivalves, gastropods, and crustaceans. Coquina clams (*Donax*

variabilis), a frequent and often important food resource for red knots, are common along many gulf beaches.

According to the BE, best management practices outlined in Appendix A of the Programmatic Final Programmatic Damage Assessment and Restoration Plan (2016) will be implemented to avoid and minimize impacts to migratory birds including the piping plover, the red knot, and their habitats. Species in the project area may be temporarily disturbed by the noise and vibrations of the proposed work, but these impacts are of short duration. Further, should piping plover occur within the project area, individuals are likely to move to adjacent areas of suitable habitat during construction. Based on the information provided and our knowledge of the proposed project, the Service's Louisiana Ecological Services Office concurs with your determination that implementation of the proposed action is not likely to adversely affect the piping plover or the red knot.

The Service recommends that your agency contact the Service for additional consultation if: 1) the scope or location of the proposed project is changed significantly, 2) new information reveals that the action may affect listed species or designated critical habitat; 3) the action is modified in a manner that causes effects to listed species or designated critical habitat; or 4) a new species is listed or critical habitat designated. Additional consultation as a result of any of the above conditions or for changes not covered in this consultation should occur before changes are made and or finalized.

The Service's, Louisiana Ecological Services Office appreciates the opportunity to provide comments in the planning stages of this proposed project. If you have questions regarding this letter, please contact Ms. Angela C. Trahan (337-291-3137) of this office for further assistance.

Literature Cited

Deepwater Horizon Natural Resource Damage Assessment Trustees. (2016). Deepwater Horizon oil spill: Final Programmatic Damage Assessment and Restoration Plan and Final Programmatic Environmental Impact Statement. Retrieved from <http://www.gulfspillrestoration.noaa.gov/restoration-planning/gulf-plan>

Copies provided via electronic mail:

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