



United States Department of the Interior


FISH AND WILDLIFE SERVICE
Louisiana Ecological Services
200 Dulles Drive
Lafayette, Louisiana 70506



April 13, 2020

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 West Grande Terre Beach Nourishment and Stabilization Project

Please reference your March 23, 2020, memorandum requesting our review of the subject project which 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.).

Implementation of the proposed project would create or restore up to 371 acres of beach and dune habitat, create or restore approximately 160 acres of intertidal marsh habitat, and protect approximately 14,000 linear feet of shoreline on West Grande Terre Island. A rock revetment would also be constructed to protect restored marsh and a rock revetment spur would capture sand transported by longshore currents. The proposed activities would occur in Jefferson and Plaquemines Parishes, Louisiana. Your office provided a revised Biological Evaluation (BE) form on March 23, 2020, 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.

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 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, the West Indian manatee protection measures would be employed to minimize potential interactions with manatees. 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.

Best management practices, identified within the BE, would be implemented to avoid and minimize impacts to the piping plover and the red knot. 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. Furthermore, should piping plover or red knot occur within the project area during construction, individuals are likely to move to areas of suitable habitat, which are available within 2 miles of the site. Implementation of the proposed project would also create potential piping plover and red knot wintering habitat. Based on the information provided, 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.

Loggerhead Sea Turtle

Federally listed as a threatened species, loggerhead sea turtles (*Caretta caretta*) nest within the coastal United States from Virginia to Louisiana, with major nesting concentrations occurring on the coastal islands of North Carolina, South Carolina, and Georgia, and on the Atlantic and Gulf coasts of Florida. Historically in Louisiana, loggerheads have been known to nest on the Chandeleur Islands and recent data indicate rare nesting attempts along Fourchon Beach in Lafourche Parish. Nesting and hatching dates for the loggerhead in the northern Gulf of Mexico are from May 1 through November 30. Threats to this species include destruction of nesting habitat and drowning in fishing nets.

Loggerhead sea turtles are not known to nest on West Grande Terre; in addition, implementation of the proposed project would create potential sea turtle nesting habitat. 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 loggerhead sea turtle.

The Service recommends that you contact the Service's Louisiana Ecological Services Office 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 that were not previously considered; 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. Karen Soileau (337-291-3132) of this office for further assistance.

Copies provided via electronic mail:
LDWF, Wildlife Diversity Program, Baton Rouge, LA