Seth Bordelon

From: Bordelon, Seth
Sent: Monday, May 16, 2016 12:50 PM
To: Matthew Weigel
Cc: Gutierrez, Raul; Farabee, Jacqueline R MVN; Kyle Balkum; Cheatwood, Twyla; Davis, Dawn - NOAA Federal; Hartman, Richard; Fontenot, Alison; Mallarch, Troy; Marceaux, Josh; Joe Maryman; Sharon McCarthy Pecquet; Pitre, John; Kelley Templet; Williams, Patrick; Stephanie Zumo; David Soileau
Subject: Re: IRT GDE Exhibit 9 as presented to the Corps change in response date

Jacqueline,

I was out of the office last week, so this is my first look at the agent's response. I do not think the information provided adequately addresses our concerns from my original email regarding the game fence. Below are a few comments and specific issues I'd like to see addressed.

As you know, the Fish and Wildlife Coordination Act requires the Corps to coordinate with the Service and LDWF before issuing a 404 permit to ensure that fish and wildlife conservation receives equal consideration with other project features. We feel that fish and wildlife resources are critical components (along with vegetation, hydrology, soils, etc.) to any functional wetland ecosystem, and therefore their impacts must be mitigated. The primary objective of mitigation banks should be to fully offset ALL wetland functions and values lost at an impact site. Secondary uses of a mitigation bank (e.g., hunting) should not dictate the design of the mitigation project in a manner that would limit the functions and values of the site. While a fence may not affect jurisdiction, it certainly affects some aspects of an ecosystem's functionality, particularly with regards to wildlife.

Wildlife movement is a primary concern regarding the fence. A fence would prevent ingress and egress for some species. There are four basic types of organism movements: (1) home range (regular movements within a fixed area), (2) migratory (seasonal movements between breeding and non-breeding habitats), (3) dispersal (movements by juveniles away from natal area), and (4) geographic range shifts (long-term movements in response to climatic or environmental changes) (Hunter, M.L. Jr., 1997). There are many scientific papers that discuss home ranges of different species, including home range sizes and overlap, as well as determining factors such as food resources, reproduction requirements, breeding territories, sex and age of an individuals, etc. The Sponsor should thoroughly address how the fence may affect home ranges of native species in the area. Migratory movements would not likely be impacted for birds, but should be considered by the Sponsor for all native terrestrial species in the area. Dispersal limitations are a serious concern with fencing. In most large mammal species, juvenile males often disperse long distances from the family unit. A fence would prevent dispersal for those animals. Dispersal should be thoroughly examined by the Sponsor for any species that may be affected. The idea of geographic range shifts should also be examined by the sponsor across all wildlife guilds. Other uncertainties regarding the fence that should be considered/addressed by the Sponsor include: (1) Is backwater flooding expected in the area? How would the fence limit wildlife ingress/egress in response to flooding events on or off site? (2) What if white-tailed deer populations grow too large and over browse the site? How might this affect habitat quality for other species that require a more dense forest understory? (3) Could confinement within the project site accelerate the spread of disease? (4) Any other factors that could affect population dynamics (by species) or unintended habitat alterations.

It should be noted that, in general, the Service does not view the exclusion of predators from a site as

ecologically beneficial. Most of the “benefits” being attributed to the fence can likely be explained by the site’s habitat diversity as compared to the surrounding monoculture pine forests. Regarding feral hogs, there are other control options that the Service would consider ecologically preferable to an 8-foot game fence exclosure. We will gladly participate in a meeting with the Sponsor to discuss alternatives to the game fence for wildlife management and feral hog control.

Hunter, M.L. Jr. 1997. The Biological Landscape. Pages 57-67 in K.A. Kohm and J.F. Franklin (eds) Creating a Forestry for the 21st Century.

Seth Bordelon
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On Mon, May 16, 2016 at 12:31 PM, Matthew Weigel <mweigel@wlf.la.gov> wrote:
Jacqueline,

Although the sponsor's argument for maintaining the fence was stated, Exhibit 9 does not provide the essential information requested by the USACE and IRT members. We believe that the information enumerated within the USACE's and EPA's previous emails (May 02, 2016 and May 05, 2016 respectively) and referenced within USFWS response (May 06, 2016) should be provided to the IRT. We too would like to review a complete information package.

Thanks for coordinating,
Matt Weigel
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Hammond, LA 70403
Phone (985) 543-4777

Habitat Section

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-----Original Message-----
From: Gutierrez, Raul [mailto:Gutierrez.Raul@epa.gov]
Sent: Monday, May 16, 2016 12:21 PM
To: Farabee, Jacqueline R MVN; Kyle Balkum; Bordelon, Seth; Cheatwood, Twyla; Davis, Dawn - NOAA Federal; Hartman, Richard; Fontenot, Alison; Mallarch, Troy; Marceaux, Josh; Joe Maryman; Sharon McCarthy Pecquet; Pitre, John ; Kelley Templet; Matthew Weigel; Williams, Patrick; Stephanie Zumo
Subject: RE: IRT GDE Exhibit 9 as presented to the Corps change in response date

This does not adequately answer any of my previous questions. In addition, a few more issues are raised below.

-The final sentence of paragraph one states that the fence will only be there for a limited number of years. We

need to know how much longer they intend to keep the fence. This can be addressed in maps depicting past, present, and future/planned conditions, but a specific time frame should be included in the narrative portion of their proposal.

-Paragraph two begins with a reference to authorization from CEMVN. The EPA does not have a copy in our records and would very much appreciate a copy of this document.

-Paragraph four states that the herd is kept below the carrying capacity. The EPA is interested in reviewing how the calculations were performed, and how the sponsor will certify that the reported number of animals on site is true. Additionally, we would like the opportunity to review the browse surveys that demonstrate the herd is below the carrying capacity.

Thanks for the opportunity to review and comment on the letter provided by the applicant. We look forward to reviewing the complete information package once it is made available.

Raul Gutierrez, Ph.D.
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-----Original Message-----
From: Farabee, Jacqueline R MVN [mailto:Jacqueline.R.Farabee@usace.army.mil]
Sent: Monday, May 16, 2016 9:27 AM
To: Balkum, Kyle <kbalkum@wlf.la.gov>; Bordelon, Seth <seth_bordelon@fws.gov>; Cheatwood, Twyla <twyla.cheatwood@noaa.gov>; Davis, Dawn - NOAA Federal <dawn.davis@noaa.gov>; Gutierrez, Raul <Gutierrez.Raul@epa.gov>; Hartman, Richard <Richard.Hartman@noaa.gov>; Fontenot, Alison <Fontenot.Alison@epa.gov>; Mallarch, Troy <troy.mallach@la.usda.gov>; Marceaux, Josh <joshua_marceaux@fws.gov>; Maryman, Joe <jmaryman@wlf.la.gov>; Pecquet, Sharon <Sharon.pecquet@la.gov>; Pitre, John <john.pitre@la.usda.gov>; Templet, Kelley <Kelley.templet@la.gov>; Weigel, Matt <mweigel@wlf.la.gov>; Williams, Patrick <patrick.williams@noaa.gov>; Zumo, Stephanie <Stephanie.zumo@la.gov>
Subject: IRT GDE Exhibit 9 as presented to the Corps change in response date

In this e-mail I requested a response by May 23 (looked at wrong date on calendar) but in fact I need a response today so that I can prepare a letter for the Sponsor.

Thanks

Jacqueline R. Farabee
Environmental Resources Specialist
Special Projects and Policy Section

U.S. Army Corps of Engineers
New Orleans District
(504) 862-2595
Have patience. Worthwhile work takes time.