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January 20, 2008

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U.S. Army Engineer District, Vicksburg

ATTN: CEMVK-PP-D (Paul Eagles)

4155 Clay Street

Vicksburg, Mississippi 39180-3435

**Re: Proposed Expansion of
Horseshoe Bend Dredged
Material Disposal Site**

Dear Mr. Eagles,

This letter is in response to the Public Meeting scheduled for January 22, 2008, 7 p.m. at the Morgan City Municipal Auditorium and questions related to the preparation of a required EA. It is my understanding that the expansion of the Horseshoe Bend Material Disposal Site will include portions of Crewboat Cut, for use during the annual maintenance of the Lower Atchafalaya River and Bayous Chene, Boeuf, and Black Navigation Channel, in St. Mary and Terrebonne Parishes, Morgan City, Louisiana.

Continental Land & Fur Co., Inc. (CL&F) owns and manages property bordering the Atchafalaya River from a point near the south end of Avoca Lake to a point south of Deer Island Bayou and portions of the banks along Bayou Chene and the adjacent lands and the water bottoms associated with the Avoca Island Cutoff Channel. One of our objectives in the management of these lands is to protect marshland, maintain hydrology, and reduce bankline erosion associated with the navigation channels located adjacent to or running through our property.

CL&F has worked with the COE and the Port of Morgan City providing dredged material disposal areas on our property. The largest of these areas are for upland disposal located between the Atchafalaya River and the Avoca Island Cutoff Channel. These areas have been used many times dating back to the 1980's and are currently available for use in 2008. However, we are not inclined to extend the use of these disposal sites in the future, when other nearby areas are in dire need of protection and could be used for disposal sites.

In the fall of 2005 we met with officials from the COE, Vicksburg District and the Port of Morgan City. At this meeting we explained our concern about erosion along the east bank of the Avoca Island Cutoff Channel and Bayou Chene and requested that several eroded sections of this east bank be included as dredged material disposal sites.

Although several meetings have taken place since that time, it appears that we are not significantly closer to the inclusion of these sites as disposal areas. The general

comments from the COE at these meetings have included reference to the long-term DMMP, the higher cost of using these areas because of location and the potential requirement of confinement.

The initial Right-of-Way for the Avoca Island Cutoff Channel was for a channel 20 feet deep and 800 feet wide. The average width of this channel today is 1,600 feet and in the areas where we would like to place dredge spoil material the average is over 2,000 feet (see attached photos). It is quite likely that the majority of the material that needs to be dredged from this channel this spring is from the erosion of CL&F's adjacent marshes.

The timing of the proposal to use Crewboat Cut as a dredge spoil disposal area is confusing. Had this been considered 20 years ago it might have seemed more logical. At this time one portion of the COE is planning for beneficial use of dredge spoil material authorized in the WRDA, while at the same time this proposal calls for dumping spoil in an existing channel used perhaps by more boat traffic than the Horseshoe Channel. The beneficial use of dredge spoil material seems to be the expectation of the future, yet this proposal would dump material into a channel that maybe 20 feet deep, 1,500 feet wide, and 7,000 feet long. It appears that this hole would hold a tremendous amount of dredge spoil material which could have been used beneficially, including the eroded areas of the east bank of the Avoca Island Cutoff Channel described above.

In addition to this fact we have other concerns about the closure of this channel. The timing and location of dredge spoil material in Crewboat Cut could cause increased erosion of our property along the east side of the channel. Narrowing of the channel could cause increased velocity and erosion of the adjacent marsh. An accurate answer to this question is an essential part of a complete EA. If a sufficient amount of dredge spoil material was initially placed against the east bank perhaps this erosion could be avoided.

A greater concern is related to the potential of higher water levels that might result from closing Crewboat Cut. It would seem that this closure could raise water levels in the northern Terrebonne Parish marshes as a resulting higher stage pushes water through all available outlets into adjacent marshes. Higher river stages during the past 30-40 years appear to be a significant factor in the conversion of stable marsh to fragile thin-mat floats and open water. In order to maintain and perhaps restore these marshes we need lower water levels not higher ones. The maintenance of banks to protect adjacent marsh is made more difficult by these high water levels. An accurate answer to this question is another essential part of a complete EA.

I look forward to a response to these several questions:

- (1) What are the plans for location and timing of dredge spoil placement in the Crewboat Cut and how will increased erosion of the east bank be avoided?
- (2) How high will water levels be in northern Terrebonne Parish marshes and for what distance from the river and for what time period as a result of the project?
- (3) Why not coordinate with other sections in the COE and La. Department of Natural Resources to use dredge spoil material beneficially instead of dumping it in this channel? Restoration and protection of eroding banklines along the Avoca Island Cutoff Channel

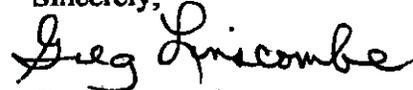
and Bayou Chene (COE navigation channel) should have a high priority for creation of spoil disposal areas resulting in beneficial use.

(4) Why not explore armoring banks along some eroding portions of the Avoca Island Cutoff Channel instead of dredging eroded material from the channel? If future dredging is required, dredged spoil material could be placed behind these armored banks.

In the past CL&F has provided maps and aerial photos (via email and hard copies) showing the general area where we would like dredge spoil disposal areas created which would slow or eliminate erosion along the east bank of the Avoca Island Cutoff Channel and Bayou Chene.

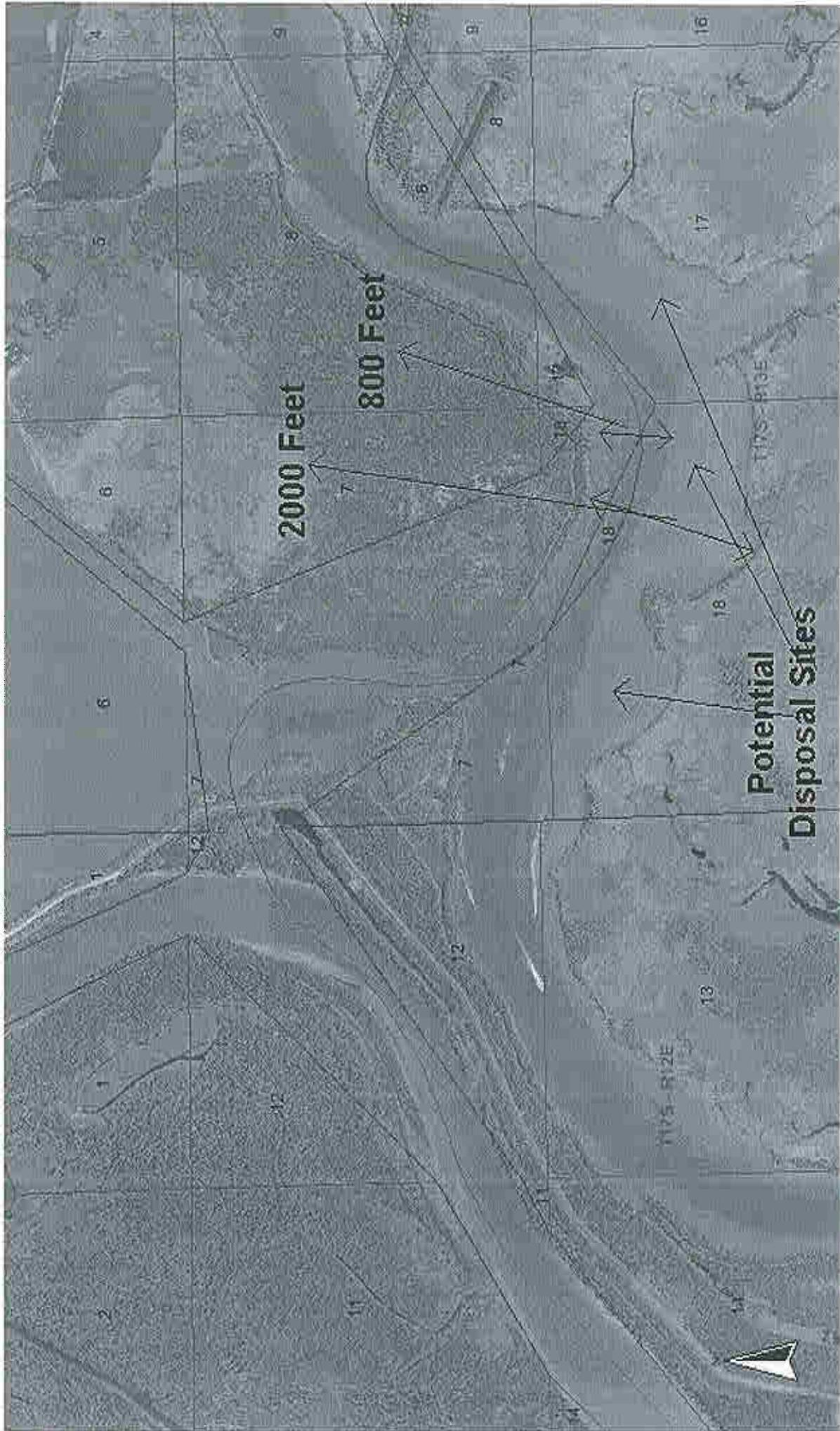
If you have questions or need more details please do not hesitate to contact me. I look forward to the public hearing for answers to these questions. CL&F reserves the right to provide additional comments following the public meeting and when more information is provided by the COE.

Sincerely,



Greg Linscombe
Fee Land Manager

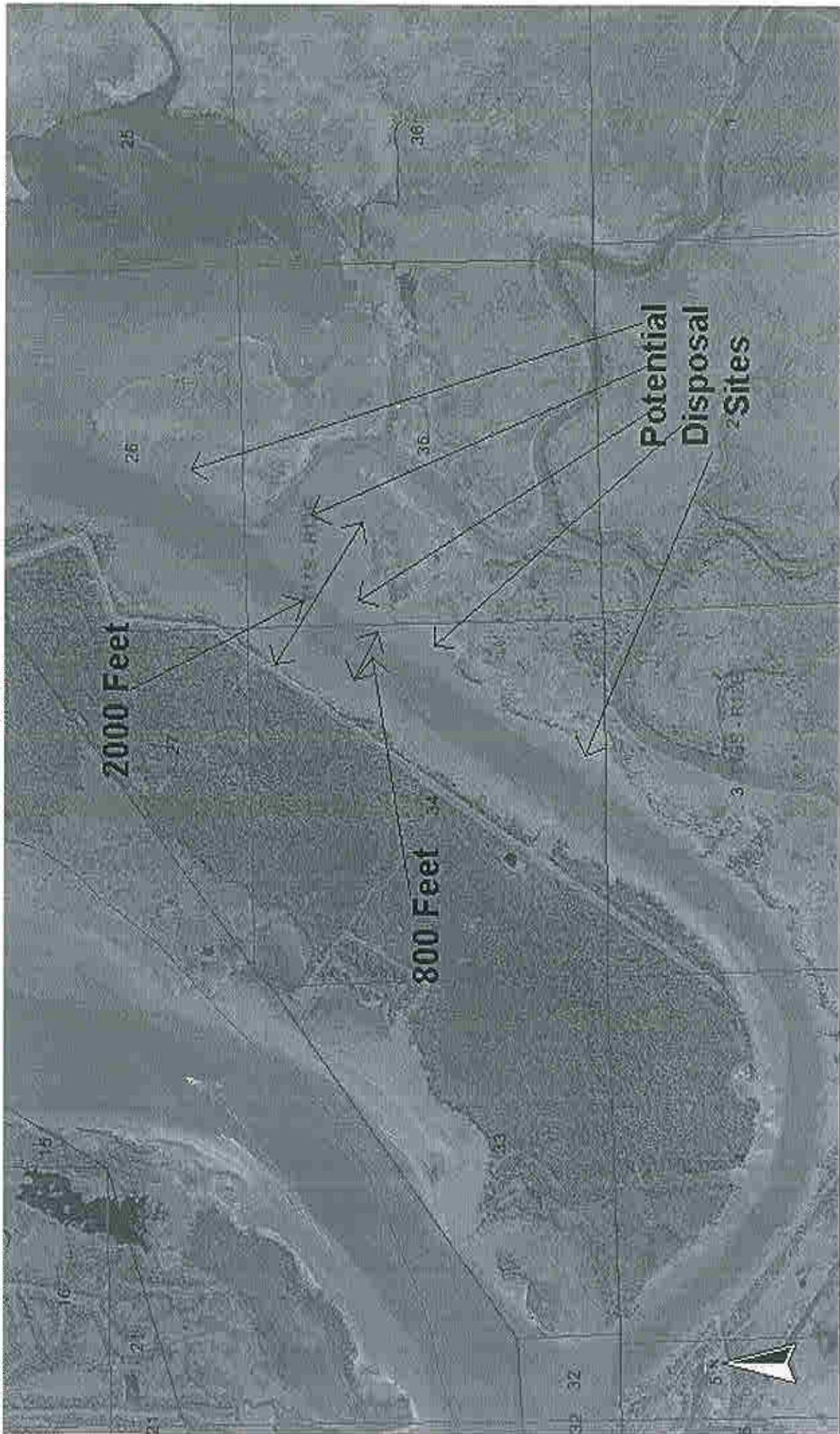
CC: Mr. Jerry Hoffpauir, Port of Morgan City
Secretary Scott Angelle, La. DNR
Ms. Leslie Suazo, Terrebonne Parish Gov.
Mr. Kerry St. Pe', BTNEP



0 2731ft



0 2731ft



2000 Feet

800 Feet

Potential
Disposal
Sites

0 2731ft