Mississippi Valley Division,
Regional Planning and Environment Division South

South Central Coast Louisiana

Hurricane Ike flooding in Delcambre, Louisiana 2008.

Appendix J - Public Involvement and Scoping

May 2022

Contents

Section 1
Initial Information Exchange Meetings (Week of November 5th-9th)

1.1 MEETING DISTRIBUTION EXECUTION

a. INVITE DISTRIBUTION
   i. Resource Agencies - Distributed on October 17th, 2018
   ii. Interested Parties - Distributed on October 25th, 2018

b. DISTRIBUTION LIST
   i. Parish Planning Boards
      Invitees: *Rachel Godeaux (Project Manager), Tammy Luke, and Heath Babineaux*
   ii. Emergency Managers
      Invitees: *Duval H. Arthur Jr. (Director), LTC. Terry E. Guidry, (Director), and Prescott Marshall (Director)*
   iii. Non-Profit Interest Groups
      Invitees: *Harold Schoeffler, and Donald Sagrera*
   iv. Levee Boards
      Invitees: *Mr. Bill Hidalgo (President), Mike Brocato, Ray Fremin, and including contacts from Red River – Atchafalya & Bayou Boeuf Levee District*
   v. Parish Engineers and Councilmembers
      Invitees: *David Hanagriff (President), M. Larry Richard (President), Chester R. Cedars (President), and Thayer Jones (Civil Engineer)*
   vi. Cities and Towns Coordination
      Invitees: *Ricky Calais (Mayor), Melinda Mitchell (Mayor), Mike Fuselier (Mayor Pro tem), Freddie DeCourt (Mayor), Dan Doerle (Mayor Pro Tem), April Foulcard (Mayor), Brad Clifton (Mayor), Frank P. Grizzaffi III, Louis Ratcliff, Rodney A. Grogan (Mayor), Eugene P. Foulcard (Mayor), Lester Levine (Mayor Pro Tem), and including contacts from Baldwin and Delcambre*
   vii. Industry Coordination
      Invitees: *Duane Lodrigue, Craig F. Romero (Executive Director), Roy A. Pontiff (President), and including contacts from Port of West St. Mary, Harry P. Williams Memorial Airport, Bayou Boeuf Lock, and Berwick Lock*
   viii. Tribal Coordination
      Invitees: *Rachel Watson, Charles R. McGimsey, Nicole Hobson-Morris, Andrea McCarthy, Kimberly Walden*

1.2 PUBLICATION

a. PRESS RELEASES
   i. Posted 11/07/2018: *"South Central Coast Study on Display"- Dredging Today*
   ii. Posted 11/06/2018: *"Corps to host public meetings in St. Martin, St. Mary parishes"- KATC*
b. PUBLIC NOTICES

i. Posted 11/06/2018: *"Corps to host public meetings to discuss South Central Coast Study"-MVN Webpage*
ii. Advertisement of Meetings - *Daily Iberian*
iii. Advertisement of Meetings - *Acadiana Advocate*

c. PUBLICATION PARTICIPANTS (INDIVIDUAL NEWS/PAPER AGENCIES)

i. Dredging Today
https://www.dredgingtoday.com/2018/11/07/south-central-coast-study-on-display/
ii. KATC
https://katc.com/news/around-acadiana/2018/11/06/corps-to-host-public-meetings-in-st-martin-st-mary-parishes/
iii. Daily Iberian *(print)*
iv. Acadiana Advocate *(print)*

1.3 MEETINGS #1

i. INTRODUCTORY INFORMATION

PDT meeting with Resource and Permitting Agencies

- When: *Tuesday, November 6, 2018, 1230-1400*
- Location: *MVN District Office, Conference Room 125*

ii. ATTENDANCE

Joe Jordan, Karla Sparks, Brian Johnson, Carrie Schott, Jeremiah Kaplain, Jason Emory, Haydell Collins, Elizabeth Behrens, Bill Klein, Marshall Plumley; Craig Gothreaux; Dave Walther, Ronald Paille; Gary Zimmerer; Michelle Meyers

iii. SUMMARY OF DISCUSSION

Introduction

Project Environmental Lead, Joe Jordan conducted introductions, and presented a project overview PowerPoint presentation, the presentation addressed project authority, schedule, existing data, and data gaps.

Discussion Topics:

1. FWS- Critical Habitat
   There is designated critical habitat in the study area for the gulf sturgeon.
2. Endangered Species
   The USFWS could provide a Planning Aid Letter discussing the potential federally listed species in the study area.
   - *Follow-up: Mr. Paille provided a draft PAL on November 20, 2018 (attached)).*
3. Land loss
   USGS has the most up to date information.
   - *Follow-up: Ms. Meyers provided additional data sources on November 7, 2018.*
4. Invasive Specie data source
   Terrebonne estuary website
5. Clean Water Act 404(c) lands
   Check with USEPA for any designated 404(c) lands.
6. Wetland Value Assessment
   Corps POCs are Patrick Smith and Daniel Meden. The USFWS may conduct the effort however.
   - *Follow-up: The MVN provided Fish and Wildlife Coordination Act funds to the USFWS. Part of this funding included the field work and WVA evaluation.*
7. Nature-based Alternatives

Consensus from the groups supported nature based alternatives but wind, water, and storm surge could require more substantive alternatives. We could investigate using native grass seed rather than turf grass for any alternative requiring a grass cover. Lake Pontchartrain Foundation may be an example to follow. For nature based solutions. The resource agencies preferred levee placement as much as possible agricultural fields rather than wetlands for any levee alignment.

8. Group consensus was salinity may not be a problem in the study area.
9. Louisiana's Coast wide Reference Monitoring System (CRMS) (USGS) website has existing water quality monitoring data.
   https://www.usgs.gov/centers/wetland-and-aquatic-research-center/science/louisiana%E2%80%99s-coastwide-reference-monitoring?qt-science_center_objects=0#qt-science_center_objects
10. GIS
    The MVN GIS team could provide state lands; FWS website has FWS refuge lands such as the Bayou Teche SE NWR complex real estate layers.
11. The Coastal Protection and Restoration Authority's website has a lot of data including the current State Masterplan with GIS information
12. Aerial photography - The final product may not be ready until August 2019. CRMA is flying the 2018 routes now.
13. High Impact mapping (from flooding and storms): FEMA has these maps.
14. Constraints
    Constraint 1: Proposed flood walls should allow wildlife passages every 3 miles.
    Constraint2: Keep water flowing; avoid stagnation.
15. Risk and Uncertainty
    Risk and uncertainty 1: Sizing outlets large enough for interior drainage versus using holding areas/smaller outlets for habitat value. This may not be acceptable to farmers and land owners.
    Risk and uncertainty 2: Induced flooding outside the planning area, particularly to the west.
    Risk and uncertainty 3: The report should articulate coastal storm surge, overland river flooding, and interior rain flooding to the public.

1.4 MEETING #2-3

i. INTRODUCTORY INFORMATION

Stakeholder Meeting

- When: *Wednesday, November 7, 2018, 1300-1500*
- Location: *St Peter Street Branch Library, 1111 W Saint Peter Street, New Iberia, LA 70560*

Public Meeting

- When: *Wednesday, November 7, 2018, 1800-2000*
- Location: *Cade Community Center, 1688 Smede Highway, St. Martinsville, LA. 70582*
- A court reporter documented this meeting in writing. This record is included at the end of this appendix.

ii. ATTENDANCE

Karla Sparks, Brad Inman, Carrie Schott, Joe Jordan, Jeremiah Kaplan, Brian Maestri, Britt Corley, Stacey Frost, Justin Merrifield, Wes LeBlanc, Kristen Ramsey, Alexis Ritner, Harold Schoeffler, Benson J Langlinias, Donald Segrera, Dave Dixon, Brent Logan, Woody Anderson

iii. SUMMARY OF DISCUSSION

Discussion Topics:

1. 2016 event and river flooding. - Will this be part of the study?
2. Ben Langlinias Iberia LD:
   Vermillion Bay the biggest storm surge and wanted to be a part of the SW study. Political boundaries don't work. (Encourage study to look broader when modeling water.)
3. SW and SC study need to be put together.
   CPRA study has it all. Master Plan.
4. Need models to help flood way and regional flooding, not just hurricane surge.
   FEMA requires certification for both.
5. Vermillion was cut in half based on the SW study
6. Need to study watersheds
   Not parish boundaries, Authority is just for the parishes (Brad), Wasting time not looking at hydraulic units not parish boundaries.
7. Our analysis has the obligation to not move flood risk outside the study area
   Add: Stacey Frost – H&H will done at the watershed level but actions will be limited to within boundaries.
8. Harold Schoeffler, Sierra Club:
   Highway 90 route was under water for 10 days. Potential options include: Going to raise the land, Build bridges, Hurricane evacuation – not rain events (Brad)
9. Wes LaBlanc:
   Dollar value for highway 90 effectiveness. Brian M. says benefits are time/costs in getting back to the area. CPRA will help gather delay costs (to traffic and industry restart up)
10. Henry Hub property is the most expensive property and should be part of the project area (west of the project area)
11. We look at 1% for surge. 10% for rainfall regardless of when the rain falls
12. Ben Langlinias, Iberia LD
    Likes the idea of a locally preferred plan. We can do this right, we just need the money to do it.
13. Harold Schoeffler, Sierra club
    Will you model the Atchafalaya - can't handle the flood? The depth is insufficient to handle a flood will the study look at riverine flooding?
    1. *MRC is studying this along the Atchafalaya (Brad)*
    2. *Another study old river control study, not this one.*
14. Are probabilities of floods increasing? - *Yes (Stacey)*
    We have current probability curves.
15. Rainfall occurrences are increasing. - *Yes*
16. FEMA numbers show areas where damages (Brit)
    The group needs to help us show where the damages are too.
17. Long discussion on flood insurance who has it who does not.
18. Infrastructure in place could a small portion.
    There is accelerate building now. They presented some of this data to the corps before. Use existing lock to release water. Is there a system wide flood control project and run by the corps?
    1. *Could be an alternative? (Stacey) – System Operation Optimization could be an alternative.*

2. *May need additional authority. (Stacey)*
3. *Mark Wingate and Nick Simmshas have been given a study concerning this.*
4. *Brad will ask them about it.*

19. Rita, Isaac, Audrey are the worst hurricanes to hit Iberia
20. Sea level rise
    Answered how it is calculated (Stacey), Sierra Club says 1 foot per century at Venice LA gauge. USACE will evaluate see level rise in project.
21. Sierra Club – riverine, hurricane, rainfall.
    All occur at the same time or can these be separated
22. Projects only found in the 2017 masterplan can be considered.
23. Sierra club – had a project dismissed –Charitan Cut - a closure/dredge project.
    St Mary Parish was trying to do this project for many other parishes.
24. Will FEMA be part of this study? – *Yes, FEMA will be invited to participate as a cooperating agency.*

1.5 MEETING #4-5

i. INTRODUCTORY INFORMATION

Stakeholder Meeting

- When: *Thursday, November 8, 2018, 1300-1500*
- Location: *St. Mary Parish Library West End Branch, 100 Chitimacha Trail, Baldwin, LA 70514*

Public Meeting

- When: *Thursday, November 8, 2018, 1800-2000*
- Location: *Morgan City Municipal Auditorium, 728 Myrtle Street, Morgan City, LA 70380*
- A court reporter documented this meeting in writing. This record is included at the end of this appendix.

ii. ATTENDANCE

Karla Sparks, Jason Emery, Carrie Schott, Joe Jordan, Jeremiah Kaplan, Brian Maestri, Britt Corley, Sarah Bradley, Stacey Frost, Wes LeBlanc, Kristen Ramsey, Alexis Ritner, Jay Vicknair, Cindy Cutrera, Michael Elay, Tim Matte

iii. SUMMARY OF DISCUSSION (See Court Reporter's notes)

Discussion Topics:

1. Two agencies
   ST Mary homeland security & parish district need to be consulted.
2. Bayou Shane's control structure is coming on line
   St. Mary and St. Martin parishes design stage and waiting for funding.
3. WRDA supposed to be looking at the old river lock
   70/30 split bet Miss and Atchafalaya needs to be looked at.
4. Delta at the Wax Lake
   Funnels water if flooding - then Morgan City gets it. Shallow areas in the bay nowhere for the water to go - needs to be looked at. There is economic loss from this work loss. Temp structure - can't afford to put it back in. Not a national loss since the work was picked up somewhere else in the country. Can use the cost of added O&M to the businesses affected.
5. Would help as a reference to look at claims.
6. Arcadia planning commission is modelling on the watershed
7. Governor has a commission for state watershed modelling.

Maybe DOT - LA watershed data exchange Nov 15, Cindy O'Neail State floodplain manager may have data.

8. Bayou Shane permit may have a lot of information.
   Cost benefit will dictate the level of protection. St Mary MP have additional levee alternatives.
   1. *Plus Morgan City has a local levee system at 1% that is not reflected in corps information.*
   2. *West of Chariton canal there is certain levee alternatives St Mary is looking at.*
9. Cedar Ray study
   Cost estimate was geared to 1% if there is something different they can readjust to get a good BC ratio.
10. SW coastal levee to Delcambre was costly it should go straight east because of study area limitation
    We may hear about this from the public.
11. FEMA has a map of every structure damaged from the last flood
12. Some companies need to be in the unprotected zone, they have a higher OM cost no one is measuring.
13. Old River complex
    High water spending a lot on this.
14. Fuel docks 2011 flood – they had to empty the fuel tanks prior to damage, may be added cost for economic impact.
15. Carbon black plants may have environmental costs if damaged
16. SW coast industry survey low response.
    Industry doesn't like to share info, maybe talk to chamber of commerce to encourage info sharing.
17. Stakeholder group – business along shore.
    Can encourage them to fill out any survey. Suggested having regular stakeholders meetings – maybe monthly webinars.

1.6 MEETING #6

i. INTRODUCTORY INFORMATION

Chitimacha Tribe of Louisiana South Central Coastal Louisiana Flood Risk Management Feasibility Study THPO Coordination Meeting

- When: *November 8th, 2018*
- Where: *3289 Chitimacha Trail, Charenton, LA 70523*

ii. ATTENDANCE

Kimberly S. Walden, Tribal Historic Preservation Officer (THPO), Chitimacha Tribe of Louisiana (CTL); Jason A. Emery, RPA -MVD Cultural Resources RTS and MVN District Tribal Liaison Cultural & Social Resources Analysis Section (CEMVN-PDP-CSR) Regional Planning and Environment Division, South; Jeremiah Kaplan, RPA - Cultural & Social Resources Section (CEMVN-PDP-CSR), United States Army Corps of Engineers, New Orleans District Regional Planning and Environment Division, South.

iii. SUMMARY OF DISCUSSION

Purpose:

Scoping meeting to introduce and provide the CTL THPO with a description and overview of the South Central Coastal Louisiana Flood Risk Management Feasibility Study Project

(SCCL) in an effort to include the input of the CTL in the planning and development stage of the project.

Discussion Topics:

1. CEMVN provided Public Scoping Meeting handout materials for distribution on reservation and provided a brief overview of key points regarding the SCCL project and its framework including:

   CEMVN is preparing a feasibility report investigating hurricane protection, storm damage reduction and related purposes along the southern Louisiana coast. Specifically, the study authorization is tasking the District to survey the coast of Louisiana in Iberia, St. Martin, and St. Mary parishes to determine the feasibility of providing hurricane protection, storm damage reduction, and related purposes. CEMVN is investigating potential solutions including levees and floodwalls, hydraulic and salinity control structures, non-structural efforts, and shoreline stabilization measures. CEMVN will not be considering ecosystem restoration as was done in the 2016 Southwest Coastal Louisiana Multi-Purpose Study. The Coastal Protection and Restoration Authority Board (CPRA), is the project's non-Federal sponsor. The study's constraints under the "one agency, one decision" review structure including expedited project schedule. CEMVN is requesting feedback from CTL on where there are specific opportunities to reduce damages, risk, and increase life safety. Additionally, CTL was asked to identify any potential conflicts that CEMVN needed to be aware of during the development of alternatives. CTL's participation and comments will contribute to the project thorough alternative analysis and environmental evaluation.

2. Specific feedback from CTL included:

   Charenton Floodgate Funding for two-way water control: hosted a couple of meetings on this and there is no money for the work at this time, but this feature is recognized as really risky for Tribes and others in the "Teche" (Bayou Teche).

   Cote Blanche Freshwater and Sediment Introduction, and Shoreline Protection Project, St. Mary Parish, Louisiana (Attachment 1): identified by CTL as a potential component for SCCL. Joint USACE/NCRS project. Already designed. Focuses on shoreline restoration and marsh creation (multiple lines of defense model-integration of naturally engineered features). Project not have been implemented due to the results of Hazard Magnetometer survey which showed numerous abandoned pipelines. Brad Inman (Senior Project Manager at US Army Corps of Engineers) was supporter of project. Potential problems to solve: 1) numerous abandoned pipelines; 2) funding approval; 3) may focus too much on ecosystem restoration. Cutting off Charenton Drainage Canal – may be good for Franklin but may cause problems for others on the west side of the Teche.

   The SCCL project has the potential to affect the Lake Fausse Pointe, Dauterive Lake, and Grand Avoille Cove Ecosystem Plan (Attachment 2; Figure 1). This project aims to control extensive sedimentation/vegetative overgrowth affecting fish and wildlife habitat in the study area. Excerpt from letter to Col. Edward R. Fleming, District Engineer, USACE, from David Walther, USFWS, August 31, 2011:

   The goal of the Lake Fausse Pointe Restoration Project is also to improve the natural fisheries habitat quality of the lake by reducing sedimentation of the lake and providing habitat for commercial and sport fish species…A system-wide approach to reduce sedimentation is needed to effectively improve fisheries habitat in the lake…The overall planning goal should incorporate the co-equal needs for continued drainage of storm-water runoff, sediment control, and fish and wildlife conservation.

3. Other discussion points of interest:

The location marked as "Flood Area" in Figure 1 is subject to repetitive flooding. It is suspected that a private landowner is responsible for these releases.
The CTL is interested in participating in the development of this study and is able to call a meeting with tribal community members and resource agency partners to provide additional feedback and direction during the development of alternatives. It was discussed that one of the major challenges to this study is that runoff (riverine and non-riverine) due to increasing flow from outside the project area (upstream and neighboring parishes) is presently one of the major factors impacting the study area. *CTL has concerns that a structural solution that focuses on coastal levees has a high potential to impact a large number of cultural resources of tribal interest.* *Any land-based structure would likely be focused in areas that the Chitimacha have ancestral ties to. Levee alignments placed on the landward side of mounds have the potential to be especially problematic as do any backwater conditions created by levees during storm events that may impact tribal cultural resources. The CTL is willing to participate in the development of a programmatic agreement as a consulting party, but is very concerned about the treatment of cultural resources. USGS sea level rise projection specifically for the CTL was provided and should be addressed.*

1.7 MEETING #7

i. INTRODUCTORY INFORMATION

PDT Second Iteration

- When: *Friday, November 09, 2018, 0830-1230.*
- Where: *U.S. Army Corps of Engineers New Orleans District Office.*

ii. ATTENDANCE

Carrie Schott, Joe Jordan, Jeremiah Kaplan, Brian Maestri, Britt Corley, Chris Talbert, J. Haydell Collins ,Dave Beck, Karla Sparks, Marshall Plumley, Sarah Bradley, Evan Stewart, Bill Klein, Justin Merrifield, Wes LeBlanc, Kristen Ramsey, Alexis Ritner, Ricky Brouillette

iii. SUMMARY OF DISCUSSION

Discussion Topics:

1. Problems & Opportunities

b. *Remove "by providing non-structural solution's"*

c. *Hwy 90 flooding (I-90 evacuation route (remove reliable as it isn't reliable currently) Where is the flooding occurring first?/Check with DOT to see if they have updated plans for Hwy 90.)*

d. *Flood Risk Statement will need to separate out rain fall events impacts and interior drainage issues from riverine and backwater flooding*

e. *Sea Level Rise (Team will need to look at low, med, and high scenario. - Haydel will check the differences between sea level rise projections within project area and make a recommendation which future scenario team should adopt., CPRA and Corps rates are different. - PDT to determine which one we will use, typically Corps medium estimate.)*

f. *Trends in water quality and salinity (Salt water intrusion issues and occurrence is not an everyday issue but with storm events it is an issue. Following Storm surge events, salt gets on the fields and then can't get back out.)*

g. *Improve drainage could have negative consequences because it will generally increase the elevation the storm surge is able to go.*

h. *Existing levees in flood area were designed for riverine flooding do not provide storm damage reduction to the 1% hurricane criteria. (Planning team is not limited to the 1% reduction. Team will optimize level of protection based on impacts and consequences. - Remove percent in the hurricane and storm and damage risk reduction statement, need to assess flood risk to public utilities and services, hospitals, and critical infrastructure.)*

i. *Need to add statements about Oil and Gas infrastructure, Ports of Iberia and contributions to the nation*

j. *HTRW (Phase 1 will need to be complete when team gets more of a focused array or potentially after TSP. Dave Beck will check on who will be assigned to SCCL to complete HTRW assessment, prevention.)*

k. *Separate interior drainage problems (Need pumps to decrease interior flooding when gates are closed – Interior damage is induced flood damages behind levees.)*

l. *Have to pass design flows - (What is the design flow/what is the existing condition design flow, is this a constraint, and is this a salinity barrier?)*

m. *Locals want the 1% level of protection to reduce flood insurance*

2. Goals and Objectives

a. *Objective 1b change to interior and flooding to riverine and back-water flooding.*

b. *Natural based feature won't prevent storm surge but will reduce the wave height.*

c. *Concern with objective 2 given the limitation in payment authorization. (This objective is meant to capture WRDA 16 Sec 1184. - This guidance defines natural features and nature-based features and requires USACE to consider natural features, nature-based features, non-structural measures and structural measures as appropriate with studying the flood risk management, hurricane and storm damage reduction, and ecosystem restoration.)*

d. *Inventory and Forecasting Refinement*

e. *Marsh loss over the last 50-60 years needs to be combined with sea level rise. (Can we reasonably quantify the impacts of marsh creation vs. levee raises? - Comparison of costs, every mile of marsh a foot reduction of surge (1960's USACE report), duration of storm can greatly effect this, hurricanes in 4 and 5 are expected to increase in number. (These types of measures are less able to with stand these types of storms.).) NOTE: Wave height and storm surge increase may use this matrix as a proxy of how these measures would perform.*

f. *Goal 2 - Reduce impact of feature marsh loss over the last 50 years and suture and sea level rise. (Can you quantify the FRM loss and tie this to levee height needs?)*

3. Constraints

a. *Consistent with the LA Master plan. May be able to deviate if levee was in same corridor. However would not be able to support a total non-structural alternative.*

b. *Move north alignment to reduce leveed area*

c. *Ring levees in the certain areas would likely not be supported by CPRA.*

d. *Mandatory relocation- non consistent with CPRA LA Master Plan and not able to support.*

e. *Non-mandatory relocation would align with CPRA LA Master Plan.*

f. *Locally Preferred Plan option*

g. *LA Master Plan will be updated in 2023. This sponsor will need to support an alternative that aligns with the intent of the 2017 Master Plan*

h. *Ag Mac - channel deepening to Port of Iberia (study about 12-15 years ago)*
i. *GIWW spoil banks- have been falling in and widening the channel. (GIWW seemed to provide a level of protection.)*

4. Measure Identification and Alternative Formulation
   a. *State levee alignment (Arcadis report) (could be minor variation in alignment; for example smooth out 90 degree corners)*
   b. *Railroad alignment, this alignment would reduce the leveed protected area and length of the levee*
   c. *Ring levees around New Iberia and Delcambre Franklin, Jeanerette, etc. This measure would focus on the communities experiencing the reoccurring damages epicenters. CPRA stated would likely not be able to support this measure as it isn't in alignment with LA Master Plan.*
   d. *Levee raise on existing riverine authorized levees; lake wax, bayou teche, sale, ridge to protection from storm surge and hurricane*
   e. *Shoreline protection feature (Northern Vermillion Bay Rim) feature would reduce erosion and storm surge impact in that location. Part of this feature alignment in LA Master Plan is outside of the Project area.*
   f. *Road Raises- elevate critical infrastructure for evacuation purposes. St. Mary levee POC can provide specific location where I-90 goes under water quickly.*
   g. *Marsh creation would serve to reduce storm surge impacts. (ADCERC runs on what type of protection this specific features provides. Measure will need to be justified on what FRM damages it can prevent as project funding authorization is limited to flood risk management.*
5. Potential Measures
   a. *Regular measures*
      1. *Masterplan has proposed levee raises in the Morgan City area*
      2. *Use ARCADAS report for structural and 2 levels of protection*
      3. *Move levees out of the marsh into farmland*
      4. *Look at all if all are required (so we don't flood others – Dependency) Dependency vs segments, ring levees around specific areas (New Iberia)*
      5. *Combination of structure/nonstructural features*
      6. *Pump station vs retention areas*
      7. *Mash lake Area, Rabbit Key, Duck Key restoration for wave attenuation*
      8. *Road raises or levees in the road ROWs*
      9. *Nonstructural only*
      10. *Consolidated water management across all entities and existing facilities – hydrology is inconsistent and the plumbing is all different. State MP may be able to do this – Federal navigation may contribute to this also.*
      11. *Shoreline protection may have storm surge marsh island protection since Marsh Island will be lost in 50 years*
   b. *Non-Structural Measures*
      1. *Marsh Island inlet closure would serve to reduce storm surge and wave heights.*
      2. *Retention features on the inside of the leveed area (instead of pump) would serve to reduce the cost of pumps*
      3. *Retention features on the inside of the leveed area to reduce size of pumps*

4. *Marsh Island wave attenuation structures*
5. *Restore Rabbit key would serve to reduce storm surge and wave heights.*
6. *Restore Duck Key would serve to reduce storm surge and wave heights.*
7. *Wave break structures off the coast would serve to reduce fetch.*
8. *Operational Optimization use existing structures and pumps and reevaluation systemic operations per event types to reduce impact*
9. *Non-structural scenario identified in LA State Master Plan. Summary is structures that are 0-3 ft. in elevation are wet/dry proofing ; 3-14 ft. elevation of structures are elevated; structures that would need to be elevated more than 14 feet would include voluntary acquisition*
10. *Managed overtopping of new levees which would serve to reduce elevation of hptrm. Overtopping locations would be designed with high performance turf reinforced mat*
11. *Reduction of factor of safety or specific criteria for a levee or segment of levee. This would reduce the leveed height and cost of mitigation and construction costs.*

6. Alternative Formulation Notes
   a. *Formulation of Sea Level Rise for low med and high scenarios is the new H&H guidance. Team will need to evaluation all 3, select a most likely and communicate residual risk. Other studies have then combined subsidence with sea level rise in the Future without Project.*
   b. *CPRA would prefer the team selected the high scenario as there is discrepancy between USACE and state estimates.*
   c. *Team will tentatively plan to utilize the levee segments in the State (Arcadis) report.*
7. Additional Questions?
   a. *Something for the Risk Register?*
   b. *Are we assuming the HISRIS levee safety standard or something less (could conserve money)?*

1.8 MEETING #8

i. Public Meeting
- When: *Thursday, May 14, 2019, 1800-2100*
- Location: *14 MAY 2019, Cade Community Center, 1688 Smede Hwy, St. Martinsville,* LA *70582 6-9 p.m.*

ii. ATTENDANCE – (Figures 1 & 2)

1.9 MEETING #9

i. Public Meeting

- When: *Wednesday, May 15, 2019, 1800-2100*
- Location: *Morgan City Municipal Auditorium, 728 Myrtle Street, Morgan City, LA 70380*

ii. ATTENDANCE – (Figures 3 & 4)

1.10 Summary of Discussion from both Meetings

1.10.1 General Comments

- Residents in St. Mary want to dredge the canals to allow for faster gravity drainage. SMLD has explained that will assist with drainage but will also allow storm surge to come into the fields farther and make salt intrusion conditions worse.
- Chitimacha Tribe is pushing to get the Charenton flood gate replaced. Feature will not be considered under South Central Coast
- Public member on 15-May meeting stated that several local businesses and residents on Front Street, Morgan City would consider relocation.
- Railroad alignment SMLD suspects will be a ROW issue. Farmers have previously stated they are not willing to give up property.

1.10.2 Potential New Features

- Mike Brocato, St. Mary Levee District (SMLD) mentioned some new features. Speed bumps/culverts by park we need to look at. Bay features that one individual mentioned. Action Item: Discuss feature options with PDT.
- Site specific coastal storm reduction measures at Lake Front, Lakeside Subdivision, in Morgan City needs to be taken into consideration. Mike said there was no funding to further design but does have preliminary alignments and pump station features. Action Item: Discuss feature options with PDT.
- Verdunville haul road may be an additional evacuation route. Partially paved and partially gravel. Haul road could possibly be used as a levee alignment. Action Item: Discuss feature options with PDT.
- Amelia has river flooding. Confirm Bayou Buff currently in P&S would address flooding. If not consider new feature. If yes, ensure inclusion in existing condition and FWOP. Action Item: Haydel Collins, Evan Stewart, and Chris Talbert confirm inclusion into existing conditions and future without project (FWOP).
- Highway 70 has flooding. Specifically public member on 15-May, Wanda, stated approximately ½ mile of road has been under water for 2 weeks. Requires a large truck for commute back and forth to work. It is a main evacuation route for study area residence and New Orleans area. Action Item: Discuss feature options with PDT.
- Salt water tolerant cypress tree species studies have been on –going at LSU for several years. Public member suggested USACE look into using this species to plant in mitigation to improve success of survival. Action Item: Joe Jordan will look into water tolerant cypress trees for inclusion into mitigation plan.
- Morgan City Port, POC Mac, stated they spend too much in dredging. Stated they would like levees near Bayou Chene. There is a barge in Bayou Chene now slowing flow. Action Item: Discuss feature options with PDT.
- •Lake Fausse has backwater flooding of structures during large events. Could be a location for site specific measure. Action Item: Discuss feature options with PDT.

1.10.3 Existing Conditions and Future without Project (FWOP)

- Ring levee around Baldwin (Bayou Shoe Pick) is in construction and funded. Funding is coming from DOT Grant Funds. Action Item: Haydel Collins, Evan Stewart, and Chris Talbert confirm inclusion into existing conditions and future without project (FWOP). If need follow up can contact Mike Brocato with St. Mary Levee District (SMLD)

- Bayou Chiupiqu is currently in construction. Action Item: Haydel Collins, Evan Stewart, and Chris Talbert confirm inclusion into existing conditions and future without project (FWOP).
- Bayou Chene Flood Protection- Will be permitted in June of 2019 and completed in 2023. Action Item: Haydel Collins, Evan Stewart, and Chris Talbert confirm inclusion into existing conditions and future without project (FWOP).
- West of Teche Ridge levee is in bad condition seems to affected by subsidence more. Action Item: Carlos Hernandez and Chris Talbert confirm inclusion into existing conditions and future without project (FWOP).
- Yockley extension Project is permitted and in construction. This is a $12.5 million investment. Action Item: Haydel Collins, Evan Stewart, and Chris Talbert confirm inclusion into existing conditions and future without project (FWOP).
- Bayou Teche Floodgate on the eastside will be in place. Action Item: Haydel Collins, Evan Stewart, and Chris Talbert confirm inclusion into existing conditions and future without project (FWOP).

Section 2

Utilization of Gathered Information

Information collected during the agency coordination meeting, interested parties, and project sponsor will be utilized to identify problems and opportunities, project specific objectives and constraints, and alternatives. This coordination summary will be included in this appendix for the report and a section will be added that describes how information was utilized during the study process.

Section 3

Feedback and Additional Public Comment

US Army Corps of Engineers, New Orleans District

ATTENDANCE RECORD

Date: 14 May 2019

South Central Coast Public Meeting

Location: St. Martinville

PLEASE PRINT CLEARLY

	Name	Address	City	State	Zip	Email	Phone
1	Joel Rogas	[redacted]					
2	Gerald Bodin						
3	Marty Trosclair						
4	Jason Bergis						
5	Benson J. Landreneau						
6	Joseph Berlin						
7	Eric o Bedelore						
8	David Poirier						
9	Wes LeBlanc						
10	Justin Merrifield						
11	Alexis Kramer						
12	Jeanella Ledet						
13	Howard Ledet						
14	Robert Hester						
15							
16							
17							
18							
19							

Figure 1

US Army Corps of Engineers
New Orleans District

ATTENDANCE RECORD

Date: 14 May 2019

South Central Coast Public Meeting

Location: St. Martinville

PLEASE PRINT CLEARLY

	Name	Address	City	State	Zip	Email	Phone
1	James Landry	[redacted]					
2	Scott Saucier						
3	ALFRED Robertson						
4	Joseph T. Meyers						
5	PAUL G LANDRY						
6	Byron Fuselier						
7	Ricky Melancon						
8	Michael Eloy						
9	Simone Domingue						
10	Danny Wurtz						
11	Chuck Bergeron						
12	Ronald Boudreaux						
13	Jon Bridgman						
14							
15							
16							
17							
18							
19							

Figure 1

US Army Corps of Engineers, New Orleans District

ATTENDANCE RECORD

Date: 15 May 2019

South Central Coast Public Meeting

Location: Morgan City

PLEASE PRINT CLEARLY

	Name	Address	City	State	Zip	Email	Phone
1	DONOVAN GARCIA	[redacted]					
2							
3							
4	PAUL VARNADO						
5	Sandra Wagner						
6	Mike Pugh						
7	William Verret II						
8	Ricky Mayon						
9	Ron Berger						
10	RONNIE SHAW						
11	Will Terry						
12	Michael Beard						
13	Jon Kerr						
14	Butch Daniels						
15	Jack Vitas						
16	Chris Jackson						
17							
18							
19							

Figure 2

US Army Corps of Engineers
New Orleans District

ATTENDANCE RECORD

Date: 15 May 2019

South Central Coast Public Meeting

Location: Morgan City

PLEASE PRINT CLEARLY

	Name	Address	City	State	Zip	Email	Phone
1	Jana B. Crudup	[redacted]					
2	Zach Fitzgerald						
3	Randal Pluchino						
4	STEVE BERGERON						
5	Mac Wade						
6	Cindy Cutrera						
7	Lou Tompaello						
8	Glen J HIDALGO						
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Figure 2

January 22, 2019

Acadiana Citizens for Flood Prevention
Lafayette, LA

Colonel Michael Clancy
Commander and District Engineer USACE New Orleans District

Re: Flood Protection for Acadiana

Dear Colonel Clancy,

We have furthered our research regarding potentially utilizing the Keystone lock on Bayou Teche in St. Martin Parish as an emergency flood gate. We believe opening the lock would aid in reducing flooding on the Vermillion River, Bayou Teche, and 4 related parishes. We discovered that the authority to manage pool stages in Bayou Teche north of the Keystone dam remained with the USACE when the lock operation was transferred to St Martin Parish back in 2010. Included is the related document with this language highlighted for your reference.

Regarding the risk of a major flood in our watershed we note the below data analysis.

We have updated our frequency of flooding on the Vermilion to include the last 2 year's worth of data. We have experienced 5 additional 12' flood events in the last 24 months which is an annual increase of 200% over the frequency during the earlier years of the current decade . The annual frequency of these 12' flood events is now 1.5 per year for the current decade. Please see the attached trend graph of these flood events.

We believe this flood frequency increase to be attributed to the local parishes successful efforts to improve local drainage after the 2016 flood event which increases water volume in the Vermillion more quickly.

Additionally, pool stages in both the Teche and Vermilion have remained excessively high after the above flood events for an extended period even though we had north winds and very low tides in the Vermilion Bay. This indicates that the known shoaling in the Vermilion as per the USACE survey conducted in May 2017 is greatly hindering drainage.

Considering the recent increased risk we ask the USACE to consider the following 2 requests:
1. Conduct a Maintenance Dredge project of the Vermilion River to restore the river to the authorized channel dimensions.
2. Determine the feasibility of using the Keystone Lock as an emergency flood control resource until the Vermilion Dredge Project is completed.

Please note there was a precedent of utilizing the Keystone Lock as an Emergency Flood control resource during the great flood of 1927.

We request your prompt consideration of the 2 above items.
Regards
Acadiana Citizens for Flood Prevention

Dave Dixon

Harold Schoeffler

Brent Logan

Darrell Fontenot

Cc: Mr. Mark Wingate USACE Deputy District Engineer
Ms. Tracy Falk USACE Supervisory Civil Engineer
Mr. Nick Sims USACE Project Manager
Mr. Bill Fontenot President Acadiana Planning Commission and St. Landry Parish
Mr. Joel Robideaux President Lafayette Parish
Mr. Kevin Sagrera President Vermilion Parish
Mr. Chester Cedars President St. Martin Parish
Mr. Larry Richard President Iberia Parish
Mr. David Hanagriff President St. Mary Parish
Ms. Monique Boulet CEO Acadiana Planning Commission
Mr. Donald Sagrera President Teche-Vermilion Freshwater District
Mr. David Cheramie President Bayou Vermilion District
US REPRESENTATIVE CLAY HIGGINS
US REPRESENTATIVE RALPH ABRAHAM

December 4, 2018

Comments on South Central Coast Feasibility Study

1. Study must consider flooding caused by
    a. River floods
    b. Hurricane storm surge
    c. High rainfall events
    d. Flood tides caused by high winds combined with local rains
2. Issues to consider in reducing flood levels
    a. Initiate and put in place a plan to use existing gates and locks to lower flood stages (Key Stone, Henderson and Catableau)
    b. Dredge the Jaws to restore flows to Charenton Canal Outlet into West Cote Blanche Bay
    c. Use dredge spoils from deepening of the Atchafalaya River to restore Point Au Fer Peninsula and to reduce channel capacity between Point Au Fer and South Point Marsh Island
    d. Restore Channel Capacity to authorized depth in the Vermilion River System
    e. Build permanent levees and gates at Amelia to reduce backwater flooding into St. Martin Parish and surrounding area

Harold Schoeffler

Chair Acadian Group Sierra Club

Recd 12/21/18 NS

Section 4

Court Reporter's Notes for the for the South Cetral Coast of Louisiana Commencing at 6 o'clock p.m.

U. S. ARMY CORPS OF ENGINEERS

NEW ORLEANS DIVISION

PUBLIC MEETING

HELD WEDNESDAY, NOVEMBER 7, 2018

IN RE: PUBLIC INPUT ON FEASIBILITY STUDY FOR

HURRICANE AND STORM PROTECTION AND STORM DAMAGE REDUCTION

FOR THE SOUTH CENTRAL COAST OF LOUISIANA COMMENCING AT 6 O'CLOCK P.M.

CADE COMMUNITY CENTER

1688 SMEDE HWY

CADE, LOUISIANA 70582

INDEX

PROCEEDINGS:

(Meeting is caiied to order.)

OFFICER: Tonight is a two-part meeting. One is we want to give you some information about the South Central Coastal Louisiana Flood Protect ion Project.We are going to key in on information that is needed before any study or project takes off and we want to get your feedback. There are many, many things we consider. More often that not, nobody knows this area as well as the people who live there. And quite often the old saying is true. We don't know what we don't know. And so your input, your feedback will help really get this started in the right direction. So there are several ways to do this.We can take the comments tonight and there are also several other ways to submit your comments on the cards on the table in the back. We are not necessarily asking you to comment tonight, though we do appreciate if you do. We have comment cards in the back. They are pre-postage paid. So if you wanted to take it in a little and digest it it a little bit and let it sink in, you know, I can guess you can have, and by all means, please you can do so.We might not do as you are probably used to. We are not setting a "Comments are due by 8:00 PM.)

That will come later. So right now there is kind of an opening mic andThe project's name is South Central Costal Louisiana Flood Protection and Storm Risk Management Feasibility Study. So tonight we what we plan to do is introduce the project, talk about the authority's study area, as well as the coordination that we intend to do the planning project, the project schedule, and the planning process that we will use. Public Agencies hold Public Meetings where we can scope out all of the existing information. This information is gathered in what we call scoping meetings. After we finish the scoping meetings, we go and do research, develop and package alternatives. We will being that over the next year, developing those alternatives, evaluating those alternatives, and approximately a year from now we will be corning out to you again with our plan. That plan will be our team's recommendation and our findings and why we recommend the plan we should implement. So that would be next fall approximately. At that point, we would do another scoping meeting and you will have the opportunity to respond and counter on that tentatively selected plan. Then, once we incorporate you guys' feedback, we can actually make a final plan and do a final plan

selection. That will then be transmitted to our headquarters in approximately 2020, with a final report approval in September of '21.

Because of this -- This is provided by supplemental funding. There is a lot of pressure in the Corps to maintain that three (3) year schedule. So that is part of the reason why there is a big rush right in the beginning. Typically they start a little slower than that. So that's why we are here, generally to give a little more information to present to you. But in this case, part of the team's approach is (...unintelligible.) three (3) years along.

Alright, so we are going to go through what we call the 6-step planning process. The first step is to identify problems facing our team. So the team is using existing map plans and other diagrams to develop a draft list of problems and other issues that we would like to get feedback on tonight.

So the first problem we have identified is that flood risk is generally in this area followed by a storm surge and riverene flooding. Additionally, there are some existing levees within the project area. Those existing levees were generally designed for riverene

flooding and not the one (1%) percent hurricane protection level. So that can also be a challenge. And then additionally there are environmentalists that spoke on the human environment and the natural environment area. Within the project area, as you know, there have been multiple storm events that have led to infrastructure damages. I'd like to look at the infrastructure damages one at a time and show some of the data we have thus far on the damages. Within the frontal area, we are seeing land loss, as well as (...unintelligible.) delta formation on the eastern side of the boundary. There is really a line for each there. And then of course, (...unintelligible.) Some of the opportunities that we have within the project area for the Corps, whose objective is to make state public safety is always a top priority, and we have an opportunity here to really focus on public safety. We had an opportunity to reduce flood damages and risk land and property by building both structural and non-structural features. We really have an opportunity here to gather local, state, and federal plans and funding. We are really trying to get everybody

flowing in the same direction. I am really counting on (...unintelligible.)

The first goal we identified was to increase the sustainability and resiliency of communities to flood event. What we are really trying to get out there is we recognize that there is an opportunity to reduce those recurring damages. It is also important for us to communicate that there is always going to be flood risks within these project areas. So we can't completely abate that risk as a result of this project, but we certainly can look to reduce it.

The second goal then is to maintain and sustain the resiliency of natural eco-systems to reduce flood damages. What this goal is really trying to get at is: Across the United States on Corps's project that are flood risk management, we have seen communities deal best with re-occurring flood and coastal storm impacts when they have multiple lines of defense. When that natural eco-system is in play, and it is healthy, and it is absorbing as much of the water as it possibly can, that is when there are all kinds of structural and non-structural elements all kind of playing together. And

that's what -- We really think we have an opportunity here to insure that is working for you guys as well. So with every Corps's Project, there needs to be a non-federal sponsor. In this case it is the "Louisiana Coastal Protection and Restoration Authority, or CPRA. Throughout the project we anticipate coordinating however with quite a few other agencies. This list is not by any means exhaustive, but does just kind of give a flavor for all the entities that we plan to coordinate with and get feedback from as we move through the process. Others would include FEMA, National Marine & Fisheries Service, Louisiana State Homeland Security, those folks. Additionally, within that project area there is cargo interests, and so we will coordinate with interested travel parties as well.

So, the project schedule.You know, we just kicked this off approximately thirty (30) days ago. We really wanted to get out and get feedback from the public and from agencies and really try to gather that information that you guys already have in these areas as quickly as possible. So that is we were are here today. After these meetings, what we are going to do is go back as a team and start developing alternatives. Over the next several months, nine (9) months or so, we

will be developing those alternatives and then evaluating those alternatives. We anticipate being back out to you guys in the next year with a tentatively selected plan. So about this time next year we will be presenting again to the public and asking of input on a draft plan. Once we incorporate the public's input into that draft plan, then we make a final recommendation and transmit that up to our higher quarters. So we were are looking for a final report in September of 2021.

So there are two (2) stars that need to align for the Corps to start a project. The first is the authority. For this project, we actually received the authority back in 2006. Here, you can see -- I am going to call your attention to this part here. (Indicating.) That starts with "The Secretary of the Army is requested to survey the coast of Louisiana in Iberia, St. Martin, and St. Mary Parishes with a view to determine the feasibility of providing hurricane protection and storm damage reduction and related purposes." So the Secretary of the Amy is the Corps of Engineers. Essentially, this tells us what we need to study and where we need to study

it. I would note there was a name change. The original authorizations said "Southeast Coastal Louisiana". There is another study that also had a very similar name; so it was changed to 'South Central Coastal Louisiana". So that is the study authority.

We understand that Hwy 90 is an evacuation route when a hurricane events. And we believe that presents an opportunity for our project to extend that coastal land and wetland loss and thereby reduce flood risk damages.

So the second step in our plan process is to inventory your existing conditions, meaning both the natural land and the built-up land, and then forecast out fifty (50) years into the future. So we will do for a variety of things and we will show you some examples of information that our team was gathered thus far.

Here, we have the storm surge elevation with levees that aren't designed to elevation, so you can see it. (Indicating.) What this is showing you is that there is some protection that is also being provided from storm surge. So the 11.5' there is the elevation of

the
levee. These are really small (unintelligible.) So about a half a foot here would really help with storm surge. You can see up here where you don't have flood protection where it is come in. So this wasn't specifically designed for coastal storm surge. It was designed for riverene flooding.

In this diagram you can see just a little more of the existing flood infrastructure. Here it is a little bit more certain and shows the different levels that are actually in place right now. And these little "circleu areas are the existing pumps. So we are looking at the existing pumping capacity, another level of protection *(...unintelligible.) (Speaker moving around and away from mic/podium throughout thus far.)*

AUDIENCE MEMBER: Can you repeat that last sentence? Starting back about the "circles.

CARLA SPARKS: Sure. The dots here are your existing pumps.

AUDIENCE MEMBER: Pumps?

CARLA SPARKS: Pumps, yes. So part of what we

will look at right now are the existing conditions and we will determine how much is the pumping capacity you have right now, as well as the overall flood protection. And the inventory for the past is some really critical stuff. That's the reason that inventory and forecast are important. We forecast out forty (40) years into the future and we use the forecast to determine *(...unintelligible.)* objectives. So for example, if your storm surge is showing that you have a conflict here, to project out into the future what we are anticipating with all of the data, the wave action, the sea level rise, all of the things that can play into storm surge, and we would then look at all of the alternatives and how those alternatives abate storm surge. And that is always compared to our existing conditions of our inventory. So it is essential that the inventory is correct because it is really critical to planning and forecast.

Some of the other data that we have gathered thus far within the project area, and, you know, over here (Indicating.), and you are well aware of some of the damages that have occurred in the communities. But what we have seen so far there are approximately 177,000

people. There is about 75,000 structures and the value of this area (Indicating.) is about $18.6 billion. And that breaks down to each parish. This is Iberia Parish with approximately 72,000 folks living that area. The approximate value is $7.8 billion. You see both residential and non-residential structures here.Most of those structures appear to be raised to up to two (2') feet. And that is pretty common for all of the parishes *(...unintelligible.)* This is St. Martin' s Parish. You have a value of approximately $5 million and 22,000 structures. And here's St. Mary's Parish where there is 23,000 structures and a value assigned of (...unintelligible.)

So in terms of some the damages that have been incurred in these project areas, these are the *(...unintelligible.)* and received the most damages. These are just preliminary numbers where we know of the hazard. We, right now, are going to evaluate this point; but this just kind of gives you a sense of what we know are minimal damages and how they occurred.

AUDIENCE MEMBER: Speak into the mic

CARLA SPARKS:. Is that better?

MEMBER: Much better.

CARLA SPARKS: So in Iberia Parish there has been a total of $94 million in the last forty (40) years paid on non-FEMA plans. What that represents, just to give you a scale of this number, this is approximately We know that this is the only looking at those individuals that have flood insurance in the project area. Approximately twenty (20%) percent of the people in the project area have flood insurance. So we know that this number is higher, but it is still valued at $94,000 million. The figure in St. Martin's Parish over the last forty (40) years has been about $19 million worth of damages. And in St. Mary Parish we know that there has been at least $31 million worth of damages.

Also in the study area, just looking at when this -- a large percentage of the area is holding longer, were already wetlands. It is about seventy (70%) percent of the project area. The next largest land area where we have in the study area is cultivating crops. And then we have *(...unintelligible.)*, mostly sugar cane in Iberia.

With each one of our projects we are required

what they call a "no action alternative". That 'no action" requirement is essentially saying, "What would happen to the human resources and the natural resources in this area if nothing was done?" And that is, again, projected over fifty (50) years.

So this isn't an all-inclusive list. These are some of the things that we will look at that would influence our future forecasting. We are conceding this area has an increased flood risk due to sea level rise,an there is an increased frequency and intensities of storms. There is subsidence in some of the areas as well as delta formations in the area. So that is going to make a difference in terms of elevations between those.

So as we formulate for our actual alternatives, we will have to consider a variety of things.So there is always some constraint that we have to take into account when we formulate our alternatives. These are some of the ones that we anticipate having to take into account on this project area.Certain

(...unintelligible .)

loss. If we do structural..

Speaker has turned and moved away*from mic.)* In this study, the appropriation for this

11 specifically *(...unintelligible.)* Originally, we had

12 hoped that we would be able to move forward toward

13 coastal restoration. Very similar to Southwest Coastal.

14 Many of you are familiar with that study. This project

15 authorization, or funding authorization, unfortunately

16 eliminated that *(...unintelligible Turning away fro mic* again.)

17 We will, of course, to consider any design

18 constraints for local infrastructure (...unintelligible.)

19 minimizing any transfer and avoiding a transfer risk to

20 any of the outlying communities. And if there is any

1 hazardous waste within the project area, we will have to take that into consideration for our designs and

2 alternatives.

3 So we are really just scratching the surface of

4 getting and collecting all those data. Some of the

5 information we are going to be collecting and the where

6 we are thinking we can get that information from is

7 vital. What I would like to know is -- There is a few of

8 these that we would really like to come up with

9 *(...unintelligible.)* that we did work on.

We talked about earlier what communities have experienced. So we really need your guidance and input to help us focus in on the right areas. Specifically we are looking at -- We looked and there were flood damages from past storms (...unintelligible. People next to me talking over the *speaker's recording.)* and where those damages were occurring. That would be very helpful to us. We also would like to know there are additional commercial or industrial facilities in the project area that are partnered for master plans for things that you know we need to have *(...unintelligible. People next to* me *talking again.)* over the next couple of years. And we'd really like to know that information as well so that we don't propose anything that would potentially impact those projects. So if anything that is going to affect the design or work, we need to know that now. So that is just a look at how we formulate out plans. Our project sponsor, CPRA, funded a study through Arcadis that we intend to use in this project and we will look at it. That study was largely structural, so we will certainly look at that as an alternative.

Additionally, we will look at non-structural alternatives, and any combination thereof. We will also look at a few ways of capturing and focusing in on those damage areas and where we really need to get a handle on how to best provide these communities to protect them. So many of you are familiar with non-structural alternatives. Generally I think what comes to most people's mind is voluntary buy-outs, structural raises. But there is also other things that we can consider like evacuation planning, what wet-proofing and dry-proofing and those types of things. And so we will consider all of those things for this project on the table. So once we have our alternatives kind of packaged, then we have to evaluate and compare them to one another to really see where we are getting the best bang for our buck. And so we are interested in hearing from you if there is anything that you would like us to evaluate, any kind of valuation criteria. But the criteria that I have here on the slides are just some of those kind of general criteria that we are required to

look at the Corps Of Engineers. So we always look at average annual damages reduction, reduction of risk to life loss, reduction in the primary costs. Those costs would include any mitigation costs as well as full operation and maintenance costs over the project life cycle. So that would be over the fifty (50) years and that would all be included in those packages.

So once we have our alternative packages developed, then we will have to evaluate and compare them to one another to really see where we are getting the best bang for our buck. And so we are interested in hearing from you if there is anything that you would like us to evaluate, any kind of valuation criteria. But the criteria that I have here on the slides are just some of those kind of general criteria that we are required to look at the Corps Of Engineers. So we always look at average annual damages reduction, reduction of risk to life loss, reduction in the primary costs based on flood frequencies. But first, we look at costs.

Another thing we need to explain and about in terms of costs: Those costs would include any mitigation

costs

as well as full operation and maintenance costs over the

project life cycle. So that would be over the fifty (50)

years and that would all be included in those packages.

So what we really need from you folks: We

really would like some input tonight on our draft

problems and opportunities to better understand are we

capturing those problems and opportunities that are

within the project area? Are there additional problems

that we need to add? What flood event did your community

see the most damages? And was that flood event storm

surge? Was it riverene flooding? Was it back-water

flooding? What type of flooding was that? Are there

alternative strategies that would better address the

problems that we have in the project area? Are there

additional constraints in our future developme nt or

things that we should consider as we are developing

alternatives? And finally, is there any data or studies

that the project team should know about and information

that we can use so that we don't have to re-create the

way and hopefully move a little faster in this project?

We'd really appreciate that.

So we don't have a formal comment like "ending

period", which is probably not as familiar for folks. We are currently accepting public comments. At some point in the future, we will put out a formal nebo scoping request and then give a final date for comments in this initial phase. And we will make sure you guys are all notified of that.

But if you do have public comments, we can either take them tonight, we do have cards that you can send in later, and/or you can write down the Project Manager, Carrie Schott. And you can send your public comments to her. And now we will accept public comments tonight.

I'd like to say thank you for coming out tonight. We really appreciate it. And we look forward to hearing from you.

OFFICER: I'd like to take over and then say thanks to Carla Sparks. We also have Joe Latore (phonetically) in the back, the man from Rock Island (...unintelligible. Speaker is not using the mic at this time.)

There is a couple of things before we get into comments that have been stressed. First is, you know,

when we are looking at -- kind of coming to us as (...unintelligible.) As you all know, within (...unintelligible.) we have to have a finance division and a *(...unintelligigible.)* In other words, whatever damages there are, the word I am hearing is the cost of, when we are reducing damages, has to be *(...unintelligible.)* So what that means is, whatever it takes to implement and maintain, must be considered with the amount of damages reduced.

With that, we welcome your comments. Would you speak into microphone. The reason why is we have a court reporter and want to capture your comments.

HAROLD SCHOEFFLER: Harold Schoeffler with the Sierra Club in Lafayette. This is the area I lived in and fished in all my life. I know all of these waterways and have used them.

When you speak in terms of storm surge protection, the first thing that comes to is the Pointe Au Fer reef. From Pointe Au Fer, the south point, it is

roughly thirty-three (33) miles and roughly three (3) miles wide. It is supposed to be one of the biggest natural shell reefs on earth. I was very involved in the legal effort to stop the removal of that system. But first, let me address this hydrologists from the University of Florida. He said that removal of the reef is such a threat from the area from Bayou Lafourche to the Calcasieu that its impact should be done on an emergency basis computer model to show how much higher the storm surge would be expected in that region. In his testament, *it* was eight (8') feet higher. And he was expressing this announcement at a news conference at the Point of Iberia. As he was giving his report from the floor, one of the reporters asked, "How deep would it be at the Port? And he put his hand over the door in the conference room and said, "It would be about eight (8') inches over this door. He missed by a mere inch. It was nine (9") inches. And his intention was that that could possibly be destroyed and there was more protection

with the levees.

Items like Shell Keys Wildlife & Refuge, the defender of the wetlands, was *(...unintelligible.)* was out the water and was about two (2) miles long and about one hundred (100) yards wide, and had an elevation of about six (6') feet above sea level. They dredged one hundred (100) yards from it thirty (30') feet deep removing shells. And of course the big waves came and the whole Shell Keys Refuge ended up destroyed.

The same thing happened at Eugene Island. It was a white shell reef. And the Rabbit Island. All of those were destroyed. Rabbit Island was about one hundred (100) acres and had reef all over it. They removed the shell reefs south of it, and in a year it was all gone. The story of that reef and the abatement of that land, and *(...unintelligible.)*

When we took a storm surge in Iberia Parish it only affects the area mostly south of Hwy 90 from Delcambre to New Iberia. *(...unintelligible.)* from Jeanerette in St. Mary Parish to the Baldwin Canal is the area very affected. The rest is pretty much covered with levees at one point or another all the way through St.

Mary Parish. The Bayou Sale reef, that system typically was inundated by storm surge. Now they have put pumps, so that is a big help.

The riverene impacts on this area, for the most part, was this area from *(...unintelligible)* St. Martin Parish and lower St. Martin Parish. I don't think the storm surge hit the upper part of St. Martin at all.

We are threatened by flooding post-Katrina in '16. There was lots of flooding in New Iberia and St. Martin Parish flooding. I just wanted you to consider the wave environment out there.

The enormous oilfields that have wells and rigs left behind, that is quite a hazard or is about to be.

Water quality issues. Basically they have gone done quickly. The "low *o xu* (low oxygen) in the water from the swamps and the Gulf ended up killing oysters and clams.

And that impacts the whole eco-system, the marshes and all of that included.

We will send in written complaint of these claims that we think are the fault and possible ways to resolve this.

We thank you all for putting this together. I think it is really important to our area of Acadiana to give us some good direction in surviving big flood events and big hurricane events.

OFFICER: Thank you. Thank you very much, sir. We always look at that and give you feedback and rely on the feedback you give us. We **will** be responding to you through that mail.

Anybody else?

TROY COMEAUX: Troy Comeaux from New Iberia. In addition to the storm surge that he was just commenting on, we have other people who are people in Iberia Parish that are also concerned about this day-to-day flood control. Due to many of the factors I am sure were just stated, just on a day when we get three (3) or four (4) hours of south wind, the water is penetrating so far up north into our drainage system. A rain event like today, at high tide with a south wind, it will shut down the Port of Iberia. So when we talk about economic development, it is the impact that, not only responds to a storm surge, but just a rainy day with a south wind at high tide. I mean look at, look at -- Please consider how that impacts

the Hwy 90 south and the industry that (...*unintelligible.*) and all of the coastal area. So that's important to us as well. We have been fortunate to dodge a few bullets with some hurricanes that have come our way in Iberia for quite some time. But our businesses are struggling along that Hwy 90 because the rainwater has no place to go. It is just stacking up near Hwy 90 and (...*unintelligible.*).

OFFICER: And just for my clarification, you are looking at, you are looking at torrential rain as well as basically the winds stacking the water up through this area.

TROY COMEAUX: I belie ve, and I might have some -- a little bit of input or encouragement. I think our drainage system was built at an elevation in relationship to Vermillion Bay and Weeks Bay. When that rises, it is two (2 ') (feet) or three (3 ') feet above our drainage system going south. So yeah, the water is stacking up. It is going under Hwy 90 into the city of New Iberia. What is happening in addition to just the Port

of Iberia, it is also creating flood maps to expand mandatory flood insurance. So it is having a continuing impact on our real estate industry and those people where there are mandates. People cannot afford, or hope to afford, property. I passed on some property myself because they couldn't give me a quote on what the flood insurance would be until I owned the property. That is happening in multiples and is affecting our industry. It is affecting our real estate industry and our agricultural industry. So we are very involved, and not with just the storm surge.

OFFICER: Thank you, sir. Absolutely. And one of the challenges that we are going to have with this, in looking at it, you have to model it to understand the causes for all flooding. Then maybe we can see what this hearing here is bringing to us and what is actually happening with drainage issues. And I will say that, no matter what we do, we can't really do any drainage work anywhere, although the information is valuable overall.

But the authorization is for surge and riverene based flooding. So it is something that we'11 have to look to understand.

We get to come back out to you guys and kind of see what we are looking at, and you let us know in feedback.

TROY COMEAUX: When you speak about rivere ne flooding, you are talking about over time type flooding?

OFFICER: And like the backwater flooding area where it is coming basically north of the Atchafalaya River in the Basin. That we will be able to look at, including the force of the surge and the water coming in. Rain would be something you'd have to understand *(...unintelligible.)* is a Parish issue.

TROY COMEAUX: Yeah. My point to that is: Obviouslyyou can't address the area of the drainage issue. I understand that in every community. My point is is that the economy says it is the barriers that were destroyed, there is a lot of salt water intrusion, which impedes with the rainwater, from having a place to go. We have a commercial canal that comes right up through to the Port

of Iberia on one of the main thoroughfares of the City of New Iberia. It a commercial canal. And it goes all the way into the middle of the town. A lot of this is not culverted and underground, but it goes all the way into the city and directly into the Port of Iberia.Since the barriers have been destroyed, as was well-often explained, the intrusion of salt water penetration corning to the north is affecting a lot more industry than what we might necessarily get. We need to get a lobbyist's reaction to this or a feel for it. It is not just a coastal thing. It is corning into and affecting the community.

OFFICER: Is it some sort of chain reaction?

TROY COMEAUX: Correct. Because the FEMA flood maps are growing with higher flood insurance rates are growing, the cost of living is growing. The real estate industry is suffering. The crops are suffering because of the infiltration and for many other reasons that Mr. Schoeffler just spoke about.

OFFICER: Thank you.

Yes, sir?

Council.

MARTY TRAHAN: Yes, Marty Trahan, Iberia Parish I represent District 13. Corning up from the Declarnbre area , like Mr. Schoef fler said, the Point au Fer reef, I remember that as a kid when Shell Keys was sticking way up out the water. Okay? *(...unintelligible.)* felt the surge corning in when it is high tide. Because if you come up to Delcambre, you come up to Lake Peigneur and you have pumps A and B all draining into that basin right there right on the west side of the South Central Study. Okay? That is another point we've got to look at. That goes back all the way into Lafayette, Youngsville, Broussard, Lafayette. That all has to drain back into there.

In fact that phone call that went off a while ago, is a Hwy 90 business that is, just with the rain we had today, and we had a massive amount of rainfall, they are about to get water into their businesses. Okay? So we are looking at the drainage canal being dug out to (...unintelligible. His voice is trailing off.) *you*

know, some other places. And we are working on that drainage.I think it needs to be looked on the most west part of it. Like Mr. Schoeffler said, it is going back into Lafayette. We get this from rain events, not no storm surge are lo w.

TROY COMEAUX: Right. Especially if the tides If it is high tide, a high tide will bring *(...unintelligible.)* from what I saw. This is the fourth time we' ve seen this flooding of businesses since since 2016.

OFFICER: Thank you very much.

BILL DUNCAN: My name is Bill Duncan. I have a business at the Port of Iberia. I have been there nineteen (19) years and I have been flooded about three (3) times.

When I first bought the business, I paid probably about $8,000 a year for flood insurance and FEMA did provide and rebuild for me. I used the money as best I could to rebuild my business, but also do things for in the future if I had another flood event and I could get my equipment out and so on and so forth.

What has happened to a lot of businesses in our area is that my flood insurance went up the next year twenty-five (25%) percent. I think it went up to $12,000. This last year it went to $19,000 with a $20,000 deductible. And with the down-turn in the industry, the oil industry, happening in this area, at least at the Port, I couldn't afford flood insurance. I think that is what has happened to a lot of communities. In Broussard, an area that was never in a flood plain, due to the fact everything you have said in defense of tidal surges, it keeps the drains from going out. It has put everybody in Broussard, in Youngsville that are now in flood plain areas now, that they are not meeting their needs. The bank requires them to have flood insurance that is going up faster than they can pay off their house and get out of there. This is the large thing with people from Youngsville too. And all I have ever been told, we have some areas where the entire subdivision is now in a flood plain, but they have a 30-year mortgage and they are being required to pay for flood insurance that is going up so quick. You know, it might be $2,000-something a year, or something like. But for my business, I can't even survive, you know, being there.Y'all are welcome to the Port of Iberia

tomorrow. I have a business that provides food and services to support the Port. But what I'm kind of seeing from the studies, what all y'all claim to propose is about a 5-year plan. You said three (3) years. But none of this is even put out to bid yet. And with that, we need help now. We need -- Just like Parish Council Member said, that is happening on a more and more regular basis and we are having just like this year -- I think this winter we are expecting a harsher winter weather according to Service. Which means, you know, if we have a higher than normal surge and we have a lot of rain, everybody is vulnerable. And I really the sense of urgency, if there was a lot of people here tonight, they would say that the government is moving too slowly with, with, what we need help from.

On that, we are going -- all these gentlemen here with the Port and whatever, the Levee District, we can't afford our levees because our economy is so far down and over-taxed, we can't build levees and we can't put structures in. And one of the main things that was told to us by the Parish why they didn't pass the levee tax was that the federal government needs to be a bigger part of this.

And my whole thing is, if you look at what they have done to the east of us, is, is down in Thibodaux and

these places, that is valuable and protecting those people with the structures and pump stations and things like that. But it also takes into consideration of the eco-system that allows the water to come and go as it needs to be to take care of estuaries and keep on surviving.

So to me, it seems like all of this information you already have available. It needs to be fine-tuned some more, but if you've got to five (5) years to six (6) years to study, and by the time you get the structures put in place, or whatever is needs, even dredging the Vermillion River and things like that, and I think it is their plans, by that time my business won't be there. Thank you.

OFFICER: And *(...unintelligible. Speaker has no mic.)*

MARTY TRAHAN: Marty Trahan, again. What I see needs to happen is for it to be a regional, Iberia, Vermillion, St. Landry, Lafayette, St. Martin, St. Mary, and expand it a little more what drains into us. The Parish Presidents, the whole of the Presidents needs to get a hold of this, and do a study on it. We have *(...unintelligible.)* now; but we are also going to need the federals to come on. I think it needs to be a combined effort of everybody and see what needs to happen

and at what speed it can happen.
Where I live is four (4) miles -- Well, Petitance is about three (3) from my house. The Avery is about four (4) miles. And for RITA. It came up to my door of my house. It didn't get into my house, but it continued to the door. So I know the next time I am flooded. I am going to loose my house. Okay? But I really think this needs to go regional and have the input

City/Berwick/Bayou Vista of St. Mary Parish. We have lived in Iberia Parish for fifty-three (53) years, and we are property owners here in St. Martin Parish. So all three (3) of the parishes focused on, we are involved in things that are going on.
When you did the presentation you identified flooding as a result of storm surges, as well as river flooding. A lot of the same areas are flooded as a result of those two (2) impacts; but there are different perspectives and different methods that you are going to have to look at dealing with storm surge versus river flooding.
You also identified wanting to make sure that Hwy 90/I-49 was accessible for evacuations. In the Billeaud exit off of Hwy 90, that one goes under every

time we have a storm surge, as well as around Coteau. Even though Coteau in Iberia and St. Martin Parish is a ridge, the highway there goes underwater. And right up here as (LA) 92 crosses both 182 and 90, those areas flood. So we can't even keep the highways open now. What is going to happen further down the road?

The other aspect is that Chapin Minlen, LLC (phonetically) did the study -- did a map and study of where the open water from the coast would be in fifty (50) years and in one hundred (100) years. The fifty (50) year one was in 2030 or 2033.

An individual, who was a technical person from the experimental farm in Iberia Parish, went and did the elevations of storm surge after KATRINA/RITA. All of that mapping showed that the open waters in fifty (50) years that Chapin had projected as flooded as a result of KATRINA/RITA. So when you start looking at what are you going to do to protect both the estuaries and the people from the flooding, you have to remember that a lot of that land is going to be underwater within the time you are going to be doing the planning. So please take that into consideration and actually plan for what will be conditions as we move forward.

Thank you.

OFFICER: Absolutely. Thank you very much. Do you have any -- If I can get to anybody who hasn't spoken yet and then we will get back to you guys who already have. So anyone who hasn't spoken want to speak?

(None indicated.)

HAROLD SCHOEFFLER: In relation to the higher tide levels, when Dr. Christiansen was here, he pointed out the Point au fer reef, in its natural structure, had a channel capacity about the same as Southwest Pass, roughly about sixty thousand (60,000') feet. Now it is over 2 million square feet. That's why the salinity is high and storm surge is weak. These tide surges are much quicker and much higher. If you would restore that, you would reduce significantly the level that it comes and how high it was and the salinity level would be lower.

OFFICER: Thank you very much, sir.

MARTY TRAHAN: Just one more point here?

(Indicating.)

OFFICER: Absolutely.

TROY COMEAUX: Troy Comeaux from New Iberia.

We are also concerned about the plans that St. Mary has that deals with their part of the coastal master plan levee and how that is going to affect a storm to the east of us in Iberia and how that water is going to be blocked in Terrebonne and Lafourche and St. Mary and how it is going to affect that extra water that is not going them. It going to come to New Iberia.

OFFICER: Yeah. You know, there is a difference there we will have consider. Even if it is a localized plans, we need to study the impacts of it as we are moving forward. Our meeting next will be in St. Mary Parish, the same as we have had with Iberia Parish and St. Martin Parish.

MR. DUNCAN: We are extremely fearful that Amelia and then Iberia will be defunct.

OFFICER: Right now I would say I have confidence on the federal side and they will consider that and the reduced flooding component. But we do have to consider what the locals are planning on their own as well.

TROY COMEAUX: Even if Hwy 90 at (LA) 329

Avery

Island Road, my house is exactly three (3) miles to the Hwy 14 and I had water past my house up the Lewis Street Road. So you are talking 90 as a corridor to get out? In years to come, (HWY) 90 will not be there at all to get out.

OFFICER: That is definitely something that we always say we can't run the risk. So they have never eliminated evacuations from the plans. (*unintelligible. Moves away from the mic.)* I am just saying that Point au Fer is in the master plan as well. I think some you have had a discussion between yourselves of that.

HAROLD SCHOEFFLER: It is a proposed project. I don't know where it ranks in being done; but Dr. Lynn Barr and Dr. Paul Ken, I have been hearing all three (3) agree that that would be a very significant protective feat. It would build up more than levees and protect a much larger area all the way from the Calcasieu to Bayou

Lafourche.

BILL DUNCAN: I think living here all our

lives, what we have seen, and if you have been here since childhood, you can always remember there was flooding of some types in some certain areas; but not as wide an area when we have a storm surge. And just like they are saying about these reefs and these areas that -- If you could point to the Marsh Island with your pointer? Where the line goes through? (Complies.) That is basically a choke point that Mr. Schoeffler was talking about that at one time really slowed down storm surge coming to the north. And these reefs were the protection that we had that slowed down the storm surges. You might have had flooding, but it took longer for the water to go through these passes and choke points. And basically, that is a natural protection that everybody understands that was there years and years ago.

You know, the point is: Now that those are not there, the storm surge comes a lot faster and it hits a lot bigger area a lot quicker and the water stays.Once it packs up into the marshes and then all the way into the canals and areas, it takes that much longer to go

back out. And goes back out -- Each time it goes back out, it opens up an even wider path because of the erosion that it is doing to the reefs and the choke points that are natural.

OFFICER: Do we have anyone else?

(All indicate "no".)

OFFICER: If possible, I think I am going to go ahead and close the meeting. Our RPM's and our planners will be here if you want to discuss anything with them. We are going to stick around for a little while and break it down. But if it is okay with you guys, I'll go ahead and close the meeting itself.

Thank you very much. Thank you very much for your comments and your insight. It will prove greatly valuable to us as we move forward in a very expedited manner.

Thank you all very much for coming out. I appreciate it.

(REPORTER'S NOTE: For the next hearing, this needs to be **held in a smaller meeting room. The auditorium was much**

too large and the sound quality was greatly diminished in spite of the latest in audio equipment.)

* * * * * *

STATE OF LOUISIANA **(Rev. 1/1/2013)**

PARISH OF ST MARY

REPORTER'S CERTIFICATE

I, ELIZABETH RHODES McCLEARY, Official Court Reporter for the 16th Judicial District Court, Parishes of St. Mary, Iberia, and St. Martin, of the State of Louisiana, employed as a court reporter for the 16th Judicial District Court, State of Louisiana, as the officer before whom this testimony was taken, do hereby certify that this testimony was reported by me was prepared and transcribed by me or under my direction and supervision, and is a true and correct transcript to the best of my ability and understanding, that the transcript has been prepared in compliance with the transcript format guidelines required by statute or by the rules of the board or by the Supreme Court of Louisiana and the Federal Rules, and that I am not related to counsel or to the parties herein, nor am I otherwise interested in the outcome of this matter.

This certificate is valid only for a transcript accompanied by my original signature and official required seal on this page.

IN WITNESS WHEREOF, I have affixed my official signature this **28th** day of **August, 2018** at Patterson, St. Mary Parish, Louisiana.

- */signed/*

- *Elizabeth Rhodes McCleary, #91325*

Official Court Reporter
16th Judicial District Court

Section 5

Court Reporter's Notes for Public Meeting Held Thursday, November 8, 2018

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U.S. ARMY CORPS OF ENGINEERS

NEW ORLEANS DIVISION

PUBLIC MEETING

HELD THURSDAY, NOVEMBER 8th, 2018

IN RE: PUBLIC INPUT ON FEASIBILITY STUDY FOR

HURRICANE AND STORM PROTECTION AND STORM DAMAGE REDUCTION

FOR THE SOUTH CENTRAL COAST OF LOUISIANA

COMMENCING AT 6 O'CLOCK P.M.

MORGAN CITY MUNICIPAL AUDITORIUM

728 MYRTLE STREET

MORGAN CITY, LA 70380

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3 **APPEARANCES**:

PROCEEDINGS:

(Meeting is called to order.)

OFFICER: Tonight is a two-part meeting. One is we want to give you some information about the South Central Coastal Louisiana flood Protection Project. We are going to key in on information that is needed before any study or project takes off and we want to get your feedback. More often that not, nobody knows this area as well as the people who live there. And so your input, your feedback will help really get this started in the right direction. There are several ways to do this. We can take the comments tonight and there are also several other ways to submit your comments on the cards on the table in the back. We are not necessarily asking you tocomment tonight, though we do appreciate if you do. We have comment cards in the back. They are pre-postage paid. So if you wanted to take it in a little and let itsink in, you know, you can do that and send in it, or your can make comments. By all means, please you can do so. (...unintelligible.) Moving away from the mic.) Right now is kind of an opening time period where we want to get out as much information aswe possibly we can. We will make an announcement later on

after have established the collected information. So we will take comments from today until next time.

But if I can, I will turn my pointer over to Carla Sparks and she will be able to kind of give you what we do. Our steps and processes may be a little different than what you are used to from our traditional way (...unintelligible.) time. So we will give a little bit of data and what you know about the area.

At this time I turn the meeting over to Carla Sparks.

CARLA SPARKS: My name is Carla Sparks. I am the Corps's rep and I am soon to be the plan formulator on this project. We thank you for corning out tonight. We know the weather is bad.

The project's name is South Central Costal Louisiana Flood Protection and Storm Risk Management Feasibility Study. So tonight we what we plan to do is introduce the project, talk about the authority's study area, as well as the coordination that we intend to do the planning project, the project schedule , and the planning process that we will use.

So the two (2) stars that need to align for the Corps to start a project, the first is the authority.

For this project, we actually received the authority back in 2006. Here, you can see -- I am going to call your attention to this part here. (Indicating.) That starts with "The Secretary of the Army is requested tosurvey the coast of Louisiana in Iberia, St. Martin, and St. Mary Parishes with a view to determine the feasibility of providing hurricane protection and storm damage reduction and related purposes." So the Secretary of the Amy is the Corps of Engineers. Essentially, this tells us what we need to study and where we need to study it.

I would note there was a name change. The original authorizations said "Southeast Coastal Louisiana". There is another study that also had avery similar name; so it was changed to "South Central Coastal Louisiana". So that is the study authority.

The second star that needs to align is the Appropriations. So we need the financial element of it. Although we have been submitting budget packages since 2006 to gain that funding, we finally got that opportunity in 2018 with the Bipartisan Budget Act. This Act did limit the scope of the study to bespecifically flood risk management and we will talk about that a little bit more.

So again, the study area is St. Martin, St. Mary, and Iberia Parishes, and we have it outlined here, the total study area in the pink. (Indicating.)

So as you are introducing yourselves, there has been a lot, as you mentioned, there has been a lot of studies and information and master plans. So when we kicked this study off on October 9th -- so a little less than thirty (30) days ago -- the team has been scouring those documents and developed some draft goals and objectives.

The first goal we identified was to increase the sustainability and resiliency of communities to flood event. What we are really trying to get out there is we recognize that there is an opportunity to reduce those recurring damages. It is also important for us to communicate that there is always going to be flood risks within these project areas. So we can't completely abate that risk as a result of this project, but we certainly can look to reduce it.

The second goal then is to maintain and sustain the resiliency of natural eco-systems to reduce flood damages. What this goal is really trying to get at is: Across the United States on Corps's project that are

flood risk management, we have seen communities deal best with re-occurring flood and coastal storm impacts when they have multiple lines of defense. When that natural eco-system is in play, and it is healthy, and it is absorbing as much of the water as it possibly can, that is when there are all kinds of structural and non-structural elements all kind of playing together. And that's what -- We really think we have an opportunity here to insure that is working for you guys as well.

So with every Corps's Project, there needs to be a non-federal sponsor. In this case it is the "Louisiana Coastal Protection and Restoration Authority", or CPRA. Throughout the project we anticipate coordinati ng however with quite a few other agencies. This list is not by any means exhaustive, but does just kind of give a flavor for all the entities that we plan to coordinate with and get feedback from as we move through the process. Others would include FEMA, National Marine & Fisheries Service, Louisiana State Homeland Security, those folks. Additionally, within that project area there is cargo interests, and so we will coordinate with interested travel parties as well.

So, the project schedule. You know, we just

kicked this off approximately thirty (30) days ago. We really wanted to get out and get feedback from the public and from agencies and really try to gather that information that you guys already have in these areas as quickly as possible. So that is we were are here today. After these meetings, what we are going to dois go back as a team and start developing alternatives. Over the next several months, nine (9) months or so, we will be developing those alternatives and then evaluating those alternatives. We anticipate being back out to you guys in the next year with a tentatively selected plan. So about this time next year we will be presenting again to the public and asking of input on a draft plan. Once we incorporate the public's input into that draft plan, then we make a final recommendation and transmit that up to our higher quarters. So we were are looking for a final report in September of 2021. There is, with all the studies that were funded under the Bipartisan Budget Act of 2018, there is an immense push to get those done in three (3) years. We really had looked really hard at our resources and anticipate we have a great team on this project. So I really do anticipate meeting that schedule.

When we do feasibility studies, we generally start with our 6-Step Planning Process. So the first step of the planning process is Identification of Problem and Opportunities. So again, the team used those master plans and scoured those and developed some initial draft problems and opportunities that we would like public feedback on. The first one is what type of flood risk you receiving in this area.Right now, based on those documents, it seems largely related to storm surge and riverene flooding. The second element, you do have existing infrastructure within the area, especially around Morgan City there are several levees. They were designed for riverene flooding, not for the one percent (1%) hurricane protection level; but they are providing some storm surge protection. I'll kind of show that here in a little bit. But we do have an opportunity there. Additionally in the project area we do have some environmental challenges that we will have to consider as we are developing alternatives . We know that you guys have had economic impacts from multiple storms in the past and infrastructure damages. There is both

land loss and delta formation that *is* occurring within the project area and sea level rise. So all of those things will have to be taken into account when we are developing alternatives.

In terms of opportunities, the Corps's top priority is always public safety. So we really do have an opportunity in this study to look at public safety and optimize. Additionally, we believe there is an opportunity to reduce those flood damages by providing both structural and non-structural solutions.

We understand there has also been a variety of planning projects, a variety of design projects as of late; and we think there is a real opportunity to leverage local, state, and federal efforts and get us all kind of pushing in the same direction.

Additionally, we also understand that Hwy 90 is an evacuation route and that there is current issues with flooding getting over that highway. So we will be looking at maintaining that evacuation route as a non-structural alternative as well.

So the second stop in the 6-step planning process is to look at inventory and forecasts. So

essentially, you look at your project area and say, "What is the current condition of both those human resources and the natural resources for the new project area? It is a really important step. You also can forecast those conditions out fifty (50) years into the future. That step is really important because it essentially serves as your baseline condition and you compare all of your alternatives to that baseline condition. So it is really important that we get that as accurate as possible.

And here, in terms of inventory, our team has developed, or pulling information and data, from existing models. This one, you can see is storm surge. And it has been clipped to the project area. The model actually goes out further than this. We can see here the 11.5 is actually the design height of some of these Morgan City levees. And you can see the storm surge is kind of

Coming up quite a bit further into the landscape here (Indicating.) than over here on the Morgan City side. So it is providing some storm surge protection, even though that is not what it was originally designed for.

In terms of other infrastructure, these kind of small dot here represent the existing pumps. So that is one thing that we may need to look at. Are there operational optimizations that we can look at or to in

this project area? And so one of those things that we are looking at is: What is the pumping capacity of the existing system. So hydrology certainly drives these flood risk management projects, but so does the economics. So, one of the things that we are required to do is look at a federal investment.

The federal government wants to say, "For every dollar we spend doing flood risk management projects, our expectation is that we are saving a dollar worth of damages." So we have at least a .1% ratio -- or 1.0% excuse me. So in this project area, we are starting to gather some initial economic data. The population within the project area is approximately 177,000 people with approximately 75,000 structures, estimated at $18.6 billion.

And then we have that broken down per parish area. So this is Iberia Parish with approximately 72,000 people. One of things to note is through each of the parishes, the residential and non-residential structures are generally raised by about two (2') feet -- one (l') foot to two (2') feet. So that's good because in most cases it is already done.

This is St. Martin Parish. Approximately

54,000 people and 22,000 structures. And then St. Mary's Parish with 51,000 people and 23,000 structures. And again, you can see that two (2') foot height of foundation on residential and one (1') foot height on non-residential.

So the other thing we have looked at was we pulled some FEMA flood statistics and FEMA claims statistics. Per parish, we looked at: What are the top five (5) areas, or communities, that are having those most damages? Here on this graphic you can see the top five (5) cities here. (Indicating.) These are the estimated damages, or total claims, that we paid out for those over the last forty (40) years. So in Iberia Parish $94 million has been claimed and paid out. In St. Martin Parish $20 million has been paid out. In St. Mary Parish approximately $31 million. These numbers, we recognize, are generally lower than the actual damages because what this captures is those individuals that have flood insurance. We know that there is a large percentage of people in the project area that do not have flood insurance, and data they wouldn't be captured here. So that is one of the things that we going to be looking for in the future to get better data on.

Other types of forecasts: So again, we look at the natural environment as well and what is the condition of those resources. Some of the information that we have been pulling together is the land use within in the project area is approximately seventy (70%) either open water or wetland, with the next highest percentage being cultivated crops. As you guys know, within those cultivated crops, the larger percentage is sugar cane within the project area. So getting back to our alternatives, we are required to have a no-action alternative. Essentially what that mean is: What happens in the project area if we do nothing? And we look at that from both the human environment and the natural environmen t. Again, this is the part where we look at fifty (50) years into the future; and in that future forecast, here we have a few of the elements that we will consider. (Indicating.) We understand that there is increased flood risk in this area due to increased storm surges which increase storm damages as a result of increased frequency and intensity. of those storms. Again, we gather tidal, subsidence, and land gains in the area. So we will be projecting all of those different elements and using that baseline to compare to our alternatives.

Every project has constraints, and we have those, of course, in our project. We will be required to comply with all environmental laws; if there is any mitigation costs, we will need to include that into our alternatives cost and compare those.

Again, back to the appropriation authority, we will not be able to formulate for eco-system restoration. We will formulate only for flood risk damage.

Another key constraint that I want to mention is: We will have to minimize any transfer of flood risks. So getting back to that graphic where you saw the project area outlined in pink, although that is the project area and that will confine where we can take action, when we do our analysis, our analysis will actually go out farther than that. It will actually have to consider the watersheds that are feeding into this area. And that is really aimed at insuring that we are not transferring flood risks. Other things that we will need to consider is any local infrastructure or transportation corridors.

you have any projects that are going to be designed, or if in design right now, or are going to be implemented here in the near future, we'd really like to know about that

so we can take that into account in our planning. The other thing that we will have to do is: We will have to avoid any impacts to the Gulf Intercoastal Waterway because that is within the project area. So we have been going out and starting to collect all this information. With only thirty (30) days, we haven' t gotten all the information that we would like. But what I wanted to show here on the graph and this table is that we do have a plan for getting some of the information that we are going to need to do the study. There are some key holes though that we need the pubic and participating agencies to assist us with. And specifically those things are: What are those damage impacts from past storms? Where did those damages occur? And was it wind? Was it storm surge? What was the cause of those damages? Because as I showed earlier in those FEMA statistics, we know that those are not capturing all of the damages that you saw. Other elements that we would need your help on, we know that our data sets, the economic sets and data sets that we are showing you, they are not very good at estimating the cost or impacts and value of industrial areas which we know that you have in the project area

And so we would be looking to get more information on those industrial areas as well.

So that brings up to Step 3. So in Step 3 we start formulating alternatives . Essentially , that is just how we package the various ways that we can address the problems and opportunities within the project area. So of course, again, we will look at a no-action strategy. We will also look at a structural alternative. Our project sponsor , CPRA, funded a study through Arcadis that we intend to use in this project and we will look at it. That study was largely structural, so we will certainly look at that as an alternative . Additionally, we will look at non-structural alternatives, and any combination thereof.

So that is how we would address the problems and opportunities I the project area. But we would also look at where we would address those problems and opportunities. So we will look at, you know, those damages as we understand tend to be clustered. And so we will start to look at how those areas were clustered and formulate alternatives on those vario us locations.

So many of you are familiar with non-structural alternatives. Generally I think what comes to most

people's mind is voluntary buy-outs, structural raises. But there is also other things that we can consider like evacuation planning, what wet-proofing and dry-proofing and those types of things.And so we will consider all of those things for this project on the table. So once we have our alternatives kind of packaged, then we have to evaluate and compare them to one another to really see where we are getting the best bang for our buck. And so we are interested in hearing from you if there is anything that you would like us to evaluate, any kind of valuation criteria. But the criteria that I have here on the slides are just some of those kind of general criteria that we are required to look at the Corps Of Engineers. So we always look at average annual damages reduction, reduction of risk to life loss, reduction in the primary costs. Those costs would include any mitigation costs as well as full operation and maintenance costs over the project life cycle. So that would be over the fifty (50) years and that would all be included in those packages. So again, what we need from you: We need to better understand are we capturing those problems and opportunities that are within the project area? Are there additional problems that we need to add

? What flood event did your community see the most damages? And was that flood event storm surge? Was it riverine flooding? Was it back-water flooding? What type of flooding was that? Are there alternative strategies that would better address the problems that we have in the project area? Are there additional constraints in our future development or things that we should consider as we are developing alternatives? And finally, is there any data or studies that the project team should know about and information that we can use so that we don't have to re-create the way and hopefully move a little/ faster in this project? We'd really appreciate that.

So with that -- Just keep going?

AUDIENCE MEMBER:

CARLA SPARKS: Yes.

So we don't have a formal comment like "ending period", which is probably not as familiar for folks We are currently accepting public comments. At some point in the future, we will put out a formal nebo- scoping request and then give a final date for comments in this initial phase. And we will make sure you guys are all notified of that. But if you do have public comments, we can

either take them tonight, we do have cards that you can send in later, and/or you can write down the Project Manager, Carrier (Schott), here. And you can send your public comments to her.

And on the back table, if you want to grab a card, it has how to submit comments. But you know, again, we are welcome to take your comments tonight. Anyone, by all means? Or if you have any questions on what we weren't clear on or anything, by all means that is why we are here.

JOHN LOMBARDO: Again, we have tons of data. We have tons of information on anything in this District which are welcome to. The gaps that we have, we have information on them, we have plans, we've got alternatives. You know, we've got tons of information (...unintelligible.) You are more than welcome to it. I mean you can just go to out website and get it. There is an inter-active map on the website that has elevation points through our current levee system. The majority of our system is a riverene

system. Now some of the areas we have raised to get them within that one (1%) percent storm surge elevation. Other areas -- It is just a lot. We haven't gotten there yet. We are trying to get our system closed first, and then we will starting getting them to those points throughout. But we do have -- I know Tim was with y'all this afternoon. We do have the area of Lakeside and the levees west of the Charenton Canal where there is nothing. I spent a couple of months a while back surveying (...unintelligible.) trying to get a feel for the area, looking at what's down there -- farmland, structures, houses -- just getting a feel for it. So we have a lot of information we are wiling to share with insight. You know, the locals know what they want and what they need.

CARLA SPARKS: That's right.

JOHN LOMBARDO: It is a pleasing game. So give me a heads up if y'all want to come down for a day and we can share information all day long and pass on surveys and all kinds of stuff.

CARLA SPARKS: That would be great. Yes, that would be very helpful.

JOHN LOMBARDO: So we are here to help any way we can.

OFFICER: Do we have anyone else that wants to

comment? I don't know, I don't want to keep y'all longer than we need. But, you know, again, we are only in the beginning. We've got a lot to go, or I guess to say the formal comment period time hasn't even begun. So out of the thirty (30) day period we have, we will make that announcement to the public and to the press and ask that you are aware of it. If anybody has any kind of words?

MONICA MANCUSO: (...unintelligible.) point of (...unintelligible.)

COURT REPORTER: Can you bring her the mic, please, because I cannot hear behind me.

OFFICER: Sure. I am going to ask you totalk loudly.

MONICA MANCUSO: From what I understand, LSU has listed Morgan City as (...unintelligible.)

CARLA SPARKS: Great. But did you say you were involved in some sort of economic studies?

MONICA MANCUSO: The Urban Land Institute.

CARLA SPARKS: Okay. I've heard of it.

MONICA MANCUSO:

(...unintelligible.) September

CARLA SPARKS: Is there some document that came out of that?

MONICA MANCUSO: Yes, (...unintelligible.)

CARLA SPARKS: Okay.Great.

MICHAEL BROCATO: The Urban Land Institute.

MONICA MANCUSO and ANOTHER LADY: (...unintelligible. Talking over each other.)... the coastal resiliency at Simmesport ... Future land use and develo pme nt plan that was done for the City.It is on the City's website under "Planning and Zoning. The structures there are current as of 2012. I know that sounds like a long time ago, but we haven't had a lot of growth here.

MICHAEL BROCATO: Actually a lot of this is in the *works (...unintelligible.) two (2) years or three (3)*years ago itstarted. (...unintelligible.)

LADY IN AUDIENCE: So there are a lot So there are a lot Yeah, Mr. Matte talked about three (3) different projects.

MICHAEL BROCATO: Yeah. Did he mention Bayou Chene, Bayou Teche, Yokley Levee Extension, Yokley Levee Improvement -- I mean the list goes on or and on.

And again, if you look at our website SMLD.org, there is tons of information on it. There inter-active map will probably give you 90% of what you want.

Also, I'll brag on Dr. Mancuso. She is a

former educator and is retired and is now doing what she can volunteering on the economic development of the area. So we really appreciate her.

OFFICER: Thank you, sir.

Anyone? I'm going once? (No response.) Going twice? (No response.)

Thank you very much for coming out and we will see you guys all again in what -- a year -- a year and a half and we will have our ideas and our approach to present to you guys and get the feedback on it.

But thank you all. If you have any questions, do not hesitate to call any one of the Corps people in this room and we will be happy to help you all we can.

Thank you very much for coming.

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STATE OF LOUISIANA (Rev. 1/1/2013)

PARISH OF ST MARY

REPORTER'S CERTIFICATE

I, ELIZABETH RHODES McCLEARY, Official Court Reporter for the 16th Judicial District Court, Parishes of St. Mary, Iberia, and St. Martin, of the State of Louisiana, employed as a court reporter for the 16th Judicial District Court, State of Louisiana, as the officer before whom this testimony was taken, do hereby certify that this testimony was reported by me was prepared and transcribed by me or under my direction and supervision, and is a true and correct transcript to the best of my ability and understanding, that the transcript has been prepared in compliance with the transcript format guidelines required by statute or by the rules of the board or by the Supreme Court of Louisiana and the Federal Rules, and that I am not related to counsel or to the parties herein, nor am I otherwise interested in the outcome of this matter.

This certificate is valid only for a transcript accompanied by my original signature and official required seal on this page.

IN WITNESS WHEREOF, I have affixed my official signature this **28th** day of **August, 2018** at Patterson, St. Mary Parish, Louisiana.

Elizabeth Rhodes McCleary

Eli McCleary, #91325
Official Court Reporter
16th Judicial District Court

Section 6

Comments Received During the Draft Feasibility Report Public Comment Period November 18, 2019 – January 6, 2020

6.1 PUBLIC COMMENTS

Comment Source	Comment ID	Source	Comment	Commenter	Discipline	District Response to Comment
Public	1	(submitted via court reporter at public meeting 12/10/2019)	So the tentative plan that is listed on the fact sheet as being tentatively selected calls for the elevation of residential structures, and then it also calls for dry flood proofing on non-residential, such as commercial, public buildings, and warehouses, so I agree with that approach.	Ms. Wilma Subra, Subra Company, New Iberia	Plan Form	The TSP includes floodproofing for nonresidential structures and elevation of residential structures in the 25 year storm surge floodplain to the future 100 year sotrm surge elevation at year 2075.
Public	2	(submitted via court reporter at public meeting 12/10/2019)	The thing that I'm concerned about is that is there going to be a point at which all new structures; residential or warehouses or industrial are required to one, if it's residential meet the base flood elevation when they get a building permit or two, if the new industrial facilities and warehouses won't be required to include dry flood proofing when they are constructed so that all the new buildings will not add a burden to the number of buildings that have to be addressed by this plan. And it would have to be building permits that would be required to be given by the parishes, but also that the parish clearly understands the flood elevation that has to be met.	Ms. Wilma Subra, Subra Company, New Iberia	Plan Form	Section 308 WRDA 1990 was not fully addressed in the draft SCCL EIS. The team had a meeting on this topic and determined that all parishes and communities will be reviewed for community rating system (CRS) participation, NFIP participation, NFIP non-compliance and determine areas where we feel there could be structures that violate Section 308 WRDA 1990. Areas of high probability of violation will be reviewed using aerial imagery. Structures identified in noncompliant communities that have been built since 1991 will be removed in time for the final report.
Public	3	(submitted via court reporter at public meeting 12/10/2019)	I believe we could use a rock jetty from the Calumet Spillway out eight miles and divert all that polluted freshwater that's coming down. When we get that fresh water out into the gulf streams out there, waters in our inland shores will become more brackish and more saltier water, and we will get back our natural habitats of our old oyster reefs that we used to have west of the Calumet Spillway and get those reefs back -- coming back alive and rebuilding. And when we get those natural reefs back, it not only slows the wave action, it'll slow land erosion down, and it'll be a species, it'll be a fish/shrimp, where they can have a feeding grounds. And oyster reefs also they're the greatest filter for pollution. It'll clean the water better than anything out there that can clean the water. There's something about oyster reefs that can clean water, make it much more better [sic] water. We can slow those tidal surges from coming down, slow that land erosion just by getting this water forced out more into the Gulf Stream. where we can go back to maintaining our saltwater where we can get these things done so we don't lose this industry. …Our inland waters are being polluted, they're being filled in from land erosion, and we believe that this rock jetty would be a great start in the right direction to get us back on our feet.	Mr. Thomas Olander, Louisiana Shrimp Association, St. Mary	Hydraulics/ Engineering	The primary aim of this study is to reduce storm surge damage. A large 6-7 mile long rock jetty extending from the mouth of the wax lake outlet towards the gulf would not be the optimal solution for risk reduction. The Cote Blanche bay would remain largely hydraulically connected to the gulf, allowing transmission of surge inland. Although local wave reduction would occur near the structure, there remains enough fetch behind the structure for the wave energy to be built up en route to landfall.
Public	4	(submitted via court reporter at public meeting 12/10/2019)	…[A] lot of the problem is out there right now is that we have actually two rivers; we have the Atchafalaya River also we have the Calumet Cut, which was dug in the 1940s to go ahead and take pressure off of Morgan City so it wouldn't flood. But what's taking place now is that I believe we're getting a lot more than 33 percent of the water coming down this area right here, and it's causing a tremendous amount of fresh polluted water coming into our bays and estuaries and pretty much pushing out any type of seafood; fish, shrimp, crabs, oysters to come inside in the estuaries to go ahead and lay eggs and reproduce.	Mr. Thomas Olander, Louisiana Shrimp Association, St. Mary	Hydraulics/ Engineering	The primary aim of this study is to reduce storm surge damage. A large 6-7 mile long rock jetty extending from the mouth of the wax lake outlet towards the gulf would not be the optimal solution for risk reduction. The Cote Blanche bay would remain largely hydraulically connected to the gulf, allowing transmission of surge inland. Although local wave reduction would occur near the structure, there remains enough fetch behind the structure for the wave energy to be built up en route to landfall.
Public	5	(submitted via court reporter at public meeting 12/10/2019)	[A]nd the way I see it, if we had a set of rocks or some type of jetties coming off the westside of the Wax Lake Outlet extending, you know, six, seven miles out, whatever they can put out in that area right there, it would divert a lot of the freshwater and push it further out into the Gulf Stream where it can go ahead and mix up where it would keep our bays and estuaries more of a saltier, brackish water. …I really think if we had a little bit of help from the Federal Government to put something right here to go ahead and get us more of a better water and more of a salinity in our water like that, you know, and also the six, seven miles of rocks, it would protect a lot of the land erosion, it would also be a hurricane protection or any storm surges that would come up.	Mr. Thomas Olander, Louisiana Shrimp Association, St. Mary	Hydraulics/ Engineering	The primary aim of this study is to reduce storm surge damage. A large 6-7 mile long rock jetty extending from the mouth of the wax lake outlet towards the gulf would not be the optimal solution for risk reduction. The Cote Blanche bay would remain largely hydraulically connected to the gulf, allowing transmission of surge inland. Although local wave reduction would occur near the structure, there remains enough fetch behind the structure for the wave energy to be built up en route to landfall.
Public	6	Via email	Current 0.01 AEP is 10.5' levee crown elevation for structural protection, but in this study, it was projected out to a 50-year condition of an elevation of 15.5'. Although 15.5' would be ideal, this study based that on an assumption. As a community, it would be better served to have some protection rather than ideal protection. Elevating levees to the current AEP offering immediate protection would better serve the community than providing no improvements due to the future costs.	Identical comments submitted individually by: Michael Brocato, Operations Manager, St. Mary Levee District; Will Terry, St. Mary Parish; Reid A. Miller; Chad Gianfala, Chairman, St. Mary Parish Consolidated Gravity Drainage District #1; Adam Mayon, Commissioner, Port of Morgan City; Michael Saunders, Vice President, Louisiana Operations, Bay Ltd.; David A. Naquin, Director, OHSEP, St. Mary Parish; Kevin P. Hebert, Berwick Town Council; Jean Paul Bourg, Director, St. Mary Parish Public Works; Monica Mancuso, President, St. Mary Excel; Carrie Stansbury, Executive Director, Cajun Coast Visitors & Convention Bureau; Cindy Cutrera, Economic	Engineering	Due to Federal laws, the Corps is required to cost out a project for the entire lifecycle, which includes future lifts to maintain the 0.01 AEP.

Comment Source	Comment ID	Source	Comment	Commenter	Discipline	District Response to Comment
				Development Manager, Port of Morgan City; Nelson B. Cortez, St. Mary Parish Tourism Commission; Catherine P. Holcomb, Citizen of Morgan City; Johnny P. Conrad; Louis Tamporello, Councilman, Morgan City District 5; Bart and Monica Mancuso, Citizens of Morgan City		
Public	7	Via email	Hurricane Storm Damage Risk Reduction System (HSDRRS) standards were required to be used for all construction. This was brought about at some point during the study. This of course changed all of the projected costs of the system on all structural protection and has significantly affected the benefit cost ratio. Nothing in the current St. Mary system is built to HSDRRS standards. That includes the USACE built MR&T levees and floodwalls and local levees. All of these were built to typical levee standards in place before the adoption of the HSDRRS standards. The system has performed flawlessly throughout the history of its existence. Short of standard O&M and some overtopping, there has never been a breach in riverine or storm surge related events. By requiring HSDRRS standards to be applied in this study, you have nullified all of the levees and floodwalls in the system, therefore the project requires the complete rebuilding of a system that is substantially complete increasing the cost to provide protection beyond affordability. By forcing HSDRRS standards for the study, there would be no project in our area that would meet the BCR. We are not aware of a requirement for this standard in the authorization for the feasibility study and believe that this policy decision should be revisited. . By removing the requirement to construct to HSDRRS standards, these projects with the correct project costs would more than meet the minimum benefit cost ratio of 1. We must look at this from a practical point of view that will meet the needs of the community.	Identical comments submitted individually by: Michael Brocato, Operations Manager, St. Mary Levee District; Will Terry, St. Mary Parish; Reid A. Miller; Chad Gianfala, Chairman, St. Mary Parish Consolidated Gravity Drainage District #1; Adam Mayon, Commissioner, Port of Morgan City; Michael Saunders, Vice President, Louisiana Operations, Bay Ltd.; David A. Naquin, Director, OHSEP, St. Mary Parish; Kevin P. Hebert, Berwick Town Council; Jean Paul Bourg, Director, St. Mary Parish Public Works; Monica Mancuso, President, St. Mary Excel; Carrie Stansbury, Executive Director, Cajun Coast Visitors & Convention Bureau; Cindy Cutrera, Economic Development Manager, Port of Morgan City; Nelson B. Cortez, St. Mary Parish Tourism Commission; Catherine P. Holcomb, Citizen of Morgan City; Johnny P. Conrad; Louis Tamporello, Councilman, Morgan City District 5; Bart and Monica Mancuso, Citizens of Morgan City	Engineering	Although protection from riverine flooding can follow the typical levee standards, New Orleans District requires all hurricane and storm surge protection meet the HSDRRS criteria. This study deals only with hurricane and storm surge protection and therefore, must meet the more stringent HSDRRS levee standards.
Public	8	Via email	Cost estimates throughout the study are not uniform and are not close to actual material or project costs that we have incurred on our more recent projects. The following table is taken from page 47 of appendix b, engineering appendix estimated cost for Ex-1. According to this estimate, the earthen levee material ranges in price from $30/cy to $38.57/cy. On page 67 of that same appendix, the Arcadis 2017, estimates say that material is a cost of $28/cy. That is taken from the cost estimate for EX-2. The cost estimate from Arcadis for Ex-1 was not included in the report. Locally we can purchase material in the vicinity of these projects at a cost of $14 to $18 per cubic yard in place. The following table was taken from the same appendix on page 48. These are the earthen material cost estimates for the Morgan City projects according to the study. These cost estimates range anywhere from $51.26/cy to $115.06/cy. If these numbers where more to the realistic costs, the BCR for the Morgan City projects would more than meet the minimum of 1. By only adjusting the earthen material cost, you would cut the project cost in half, if not more.	Identical comments submitted individually by: Michael Brocato, Operations Manager, St. Mary Levee District; Will Terry, St. Mary Parish; Reid A. Miller; Chad Gianfala, Chairman, St. Mary Parish Consolidated Gravity Drainage District #1; Adam Mayon, Commissioner, Port of Morgan City; Michael Saunders, Vice President, Louisiana Operations, Bay Ltd.; David A. Naquin, Director, OHSEP, St. Mary Parish; Kevin P. Hebert, Berwick Town Council; Jean Paul Bourg, Director, St. Mary Parish Public Works; Monica Mancuso, President, St. Mary Excel; Carrie Stansbury, Executive Director, Cajun Coast Visitors & Convention Bureau; Cindy Cutrera, Economic Development Manager, Port of Morgan City; Nelson B. Cortez, St. Mary Parish Tourism Commission; Catherine P. Holcomb, Citizen of Morgan City; Johnny P. Conrad; Louis Tamporello, Councilman, Morgan City District 5; Bart and Monica Mancuso, Citizens of Morgan City	Engineering	A uniform unit cost was used, but other costs associated with each lift were lumped into the cost shown which has caused confusion. Those other costs include mobilization, silt fence, clearing and grubbing, all weather access road, fertilizing-seeding-mulching and borrow pit development. The estimate tables have been rewritten to make the cost breakdown clearer. The Corps cannot divulge unit costs due to USACE Rules, but the Corps unit cost for embankment alone falls in line with the costs mentioned in this comment for local projects.

Comment Source	Comment ID	Source	Comment	Commenter	Discipline	District Response to Comment
Public	9	Via email	PED and Management cost. Taken from Appendix B Engineering pages 41, 42."a. Planning, Engineering & Design (PED): The PED cost includes such costs as project management, engineering, planning, designs, investigations, studies, reviews, value engineering and engineering during construction (EDC). Historically New Orleans District has used an approximate 12% rate for E&D/EDC, plus 8% for other support features for a total of 20%. This percentage is applied against the estimated construction costs. b. Supervision & Administration (S&A): Historically, a range from 5% to 15% depending on project size and type applied against the estimated construction costs for USACE projects. Other USACE civil works districts such as St. Paul, Memphis and St. Louis report values ranging from 7.5-10%. Consideration includes that a portion of the S&A effort could be performed by contractors. Currently New Orleans District utilizes an S&A rate of 9% for this type and size of project." Also taken from Appendix B Engineering, all cost estimate tables: [included an image from the cost engineering tables that list Planning, Engineering and Desgin at 20% and Construction Managment at 9%] There are many discrepancies in the report, these are just a few examples. When you have projects that are close on the BCR, those discrepancies can make or break the feasibility of the study. Not to mention 29% of project cost on Ex-1 is equal to just over $29,000,000. Locals can complete the project for less than the study's PED and management costs by building to standard levee construction practices.	Identical comments submitted individually by: Michael Brocato, Operations Manager, St. Mary Levee District; Will Terry, St. Mary Parish; Reid A. Miller; Chad Gianfala, Chairman, St. Mary Parish Consolidated Gravity Drainage District #1; Adam Mayon, Commissioner, Port of Morgan City; Michael Saunders, Vice President, Louisiana Operations, Bay Ltd.; David A. Naquin, Director, OHSEP, St. Mary Parish; Kevin P. Hebert, Berwick Town Council; Jean Paul Bourg, Director, St. Mary Parish Public Works; Monica Mancuso, President, St. Mary Excel; Carrie Stansbury, Executive Director, Cajun Coast Visitors & Convention Bureau; Cindy Cutrera, Economic Development Manager, Port of Morgan City; Nelson B. Cortez, St. Mary Parish Tourism Commission; Catherine P. Holcomb, Citizen of Morgan City; Johnny P. Conrad; Louis Tamporello, Councilman, Morgan City District 5; Bart and Monica Mancuso, Citizens of Morgan City	Cost Engineering	We have resolved the discrepancies and added additional clarification in the report. The 12% Eng cost is correct, but for the estimates we also include all the other costs such as PM, planning, environmental, etc. which results in an overall PED % of 20%.
Public	10	Via email	The current TSP is to floodproof or elevate 3,463 structures at a cost of $1,421,315,000. That is an average of $410,428.82 per structure. How can this be justified when a majority of the homes don't have a value of the elevation cost.	Identical comments submitted individually by: Michael Brocato, Operations Manager, St. Mary Levee District; Will Terry, St. Mary Parish; Reid A. Miller; Chad Gianfala, Chairman, St. Mary Parish Consolidated Gravity Drainage District #1; Adam Mayon, Commissioner, Port of Morgan City; Michael Saunders, Vice President, Louisiana Operations, Bay Ltd.; David A. Naquin, Director, OHSEP, St. Mary Parish; Kevin P. Hebert, Berwick Town Council; Jean Paul Bourg, Director, St. Mary Parish Public Works; Monica Mancuso, President, St. Mary Excel; Carrie Stansbury, Executive Director, Cajun Coast Visitors & Convention Bureau; Cindy Cutrera, Economic Development Manager, Port of Morgan City; Nelson B. Cortez, St. Mary Parish Tourism Commission; Catherine P. Holcomb, Citizen of Morgan City; Johnny P. Conrad; Louis Tamporello, Councilman, Morgan City District 5; Bart and Monica Mancuso, Citizens of Morgan City	Economics	Concur that the average square foot estimates seem high for various occupancy types. Square footages from NSI 2.0 were sorted and outliers that seemed unrealistic were checked geospatially and reclassified or re-estimated based on the aerial survey. The Southwest Coastal study, which has similar features to South Central Coastal and the average square footage for non-residential structures were 20-30% lower than SCCL, with residential structures following a similar trend. PDT is re-sampling structures damaged by the 50YR event to refine model assumptions to inform the updated hydraulics and final report. PDT will examine the square footage estimates to ensure they are consistent with what is in the field and make updates to the final report. Going forward, the study will be resampling a portion of the study area using a refined subset of the larger inventory based on the outcome of the TSP-level analysis. This amounts to 3000-5400 structures, depending on which aggregation is used (25YR vs. 50YR). We will better explain how the sample has been applied to the entire structure inventory in the report.
Public	11	Via email	St. Mary Excel recommends the completion of the levee projects in Morgan City rather than the USACE Tentatively Selected Plan of voluntary flood proofing and elevations of homes. We see the structural flood protection (levees, flood walls, etc.) in Morgan City as a more feasible option. We stand firm on our comments made as part of the USACE's feasibility study of South Central Coast Louisiana 2019 (ATTACHMENT A: E-mail of November 9, 2018 from St. Mary Excel to Carrie.G.Schott@usace.army.mil and Joseph.w.jordan@usace.army.mil) and after review of the USACE's draft document.	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Plan Form	Structural measures were assessed as separable elements for the Morgan City area, based on standard levee design criteria, and were determined not feasible due to the low benefit cost ratio. Per ER 1105-2-100, "A separable element is any part of a project which has separately assigned benefits and costs, and which can be implemented as a separate action... Separable elements so considered are similar to the planning concept of last added increments, with the added idea of separation or detachment of the increment from the whole...Separable elements usually must be incrementally justified."

Comment Source	Comment ID	Source	Comment	Commenter	Discipline	District Response to Comment
Public	12	Via email	Page 2 – Hurricane Andrew is not listed as a storm of record although St. Mary Parish was directly impacted by the storm. Many subsequent storm protection measures were implemented based on the impact of the storm. These protection measures based on this hurricane need to be reviewed. (Hurricane Andrew is included in the Appendix K document on page D-12 in Table 7 "Top Tropical Storms by Amount Paid by FEMA." The amount is the second lowest of tropical storms listed even though costs have been indexed to 2019 price levels.)	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Environmental	Appendix A-1 has been updated to include Hurricane Andrew and its impacts to the project area. The main report has been updated as well.
Public	13	Via email	Page 17 Cultural Resources – The USACE makes its Tentatively Selected Plan recommendation although recognizing that the risk to cultural resources remains applicable. "The recognized risk remains applicable to archaeological, architectural, and historical area surveys". St. Mary Excel holds this recognition to be a contribution for the cost-benefit calculation for a positive outcome for selecting a protected levee system of Morgan City.	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Economics / Cultural Resouces	USACE recognizes the significant cultural resources within the project area. Cultural survey considerations were taken into account for structural measures and risk identified that surveys could identify unknown impacts. Difficult to monetize cultural resources protection into a benefit cost ratio, which is reliant on National Economic Development Account. This account incorporates damages prevented to structures.
Public	14	Via email	Page 20-21 Cultural Resources – The USACE recognizes that the risk remains high and offers to mitigate the risk with a PA development to satisfy the USACE District's Section 106 responsibilities. Without the assessment, in light of the Civil War battles in the Morgan City area a Fort Star Morgan City location, the cultural resource assessment is a necessity. St. Mary Excel encourages the USACE to make the assessment to review the cost benefit ratio needed for advancement of the Morgan City levee projects that would protect the cultural resources of the area from elevation and/or other alteration.	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Economics / Cultural Resouces	USACE recognizes the significant cultural resources within the project area. Cultural survey considerations were taken into account for structural measures and risk identified that surveys could identify unknown impacts. It is difficult to monetize cultural resources protection into a benefit cost ratio, which is reliant on National Economic Development Account. This account incorporates damages prevented to structures.
Public	15	Via email	In the Environmental Justice section beginning on page 3, St. Mary Excel questions the percent of the population below the poverty level. Morgan City is listed as a poverty rate of 21%, a rate approximately twice the national average in following the US Census Bureau recommendation of using ACS for cities, towns and census designated places, Consideration should be given for other sources of data including City data websites and the Louisiana Department of Education reporting of economically disadvantaged student rates in Morgan City and Berwick. Table I Morgan City Wealth Indicator as taken from https://louisiana.hometownlocator.com/la/st.-mary/morgan-city.cfm#demographic WEALTH INDEX Morgan City, LA Wealth Index is 54 State of Louisiana Wealth Index is 71 The Wealth Index is based on a number of indicators of affluence including average household income and average net worth, but it also includes the value of material possessions and resources. It represents the wealth of the area relative to the national level. Values above or below 100 represent above-average wealth or below-average wealth compared to the national level. Table 2 Current demographics of Morgan City, Berwick, and all St. Mary Parish public schools as of October 1, 2019. Evidence of the poverty rate of the area is reflected in the designation of most of Morgan City and nearly all of Berwick being designated as an Opportunity Zone by Congress in the Tax Cuts and Jobs Act of 2017. The designation was used in creating an innovative private sector investment approach in low-income urban and rural communities. The USACE Tentatively Selected Plan does not address how this designation of the area impacts the cost benefit ratio in Morgan City levee projects. Table 3. Map of Morgan City and Berwick Highlighting Congressionally Authorized Opportunity Zones. Evidence of the poverty rate in the area is reflected in the employment number and unemployment rate trend data. From 2013 until the current year, the area has suffered the loss of nearly 5,000 workers. Table 4. St. Mary Parish Employment Trend Data	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Economics / Cultural Resouces	Noted. For standardization reasons, the Corps relies on the U.S. Census Bureau's American Community Survey data for all of USACE projects. For EJ, this includes both the race and low-income (poverty) data. There are probably many ways to develop a low-income criteria, such as the Wealth Index or using Opportunity Zones, which may not be available across all of our studies. For consistency, the Corps uses ACS. Additionally, the EPA provides other data through their EJSCREEN tool, which is provided in the Report. Finally, we can add the Berwick poverty data into the table, which shows a poverty rate of 21.3% (ACS 2013-2017). Both Morgan City and Berwick have 20% or more of population living below poverty, which is one criteria used to help identify EJ communities.

Comment Source	Comment ID	Source	Comment	Commenter	Discipline	District Response to Comment
Public	16	Via email	Appendix A-4 page 5-6. In a letter to Kristin Sanders SHP, a Plan of Action using a Smart Planning Framework duly notes details of the study area. The Atchafalaya Basin is especially highlighted for its 2006 Congressional designation as a National Heritage Area. This designation and the access of the public to this area through a protected levee system of Morgan City should be assessed value and this value needs to be considered in the cost benefit ratio positive outcome for selecting a protected levee system of Morgan City. The letter is signed by Marshall K. Harper.	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Economics / Recreation	Morgan City acting as a hub for tourist interested in recreating in the National Atchafalaya Basin Heritage Area does provide localized spending and economic benefits. These benefits could be quantified and included in the Regional Economic Development Accounts. However, they would not be incorporated into the benefit cost ratio due to federal regulations. Tourism is not expected to increase with a structural project in place as the structure would only reduce damages and not prevent or reduce frequency and duration of hurricane and storm surge events.
Public	17	Via email	Appendix A-5 Table 4 Page 8 lists protected resources. In its report, Morgan City and Berwick LA: Building the Foundation for a New Economy along the Atchafalaya River, the Urban Land Institute recommends: a) Morgan City achieve and maintain Federal Emergency Management Agency (FEMA) levee certification without shortcuts and follow FEMA's suggestions to achieve this certification."	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Economics	PDT understands and resognizes the importance of FEMA certification to the NFS, local residents, and other interested parties. The purpose of the feasibility study was not to obtain FEMA certification but to look at comprehensive strategies to reduce flood risk. TSP does not prevent continued or future actions by local and or state agencies.
Public	18	Via email	[Appendix A-5 Table 4 Page 8 lists protected resources. In its report, Morgan City and Berwick LA: Building the Foundation for a New Economy along the Atchafalaya River, the Urban Land Institute recommends:] b) A resilience lab was recommended for Morgan City LA. "to build on the work of the region and other institutions for implementation, commercialization and demonstration of a coastal resilience laboratory. Because the Morgan City locale has higher, safer ground and levee or floodwall-protected area alongside lower, more vulnerable areas, Morgan City was identified as ideal for potential testing grounds for strategies and technologies in coastal protection to be tested." The Morgan City levee completion cost/benefit ratio needs to include this recognition of Morgan City and the benefit the completion of the levees brings to Louisiana coastal protection and other national storm impacted areas. Without this inclusion, the human capital presence in the area continues to diminish and places greater stresses on the Protected Resources listed in Table 4 on page 8. This study was first sent to the USACE's attention in the November 9, 2019 email to Carrie.G.Schott@usace.army.mil and Joseph.w.jordan@usace.army.mil	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Economics / Environmental	New structures built within the area would have to comply with NFIP regulations and be built above the Base Flood Elevation, or 100 year flood elevation and therefore would be excluded from the economic analysis.
Public	19	Via email	Appendix A-6. The Atchafalaya Resilience Lab at Morgan City and the human capital to staff it in a FEMA certified leveed community adds safeguards to monitor fish habitat impacts on water diversions projects and coastal protection projects associated with sediment and its use in Dredge Fill Programs.	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Environmental	In Appendix A-6 and related main report sections, the PDT included a discussion on the Atchafalaya Resilience Lab and its importance to the local community and natural resources. WRDA 1990 Sec 308 states any new structures built within the area would have to comply with NFIP regulations and be built above the Base Flood Elevation, or 100 year flood elevation and therefore would be excluded from the economic analysis.
Public	20	Via email	St. Mary Excel agrees with Supervisor Joseph Ranson in his detailed consideration of the impact of a project on endangered species in the area. St. Mary Excel further offers the consideration that the cost – benefit ratio for the Morgan City levee completion should include a value for protecting the human capital within the structures of the area for monitoring and intervening when the endangered species habitat is compromised by river diversion projects, sediment dredging and any dredge fill program.	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Economics / Environmental	Flood event equivalent to 100 year event would require evacuated. ESA species monitoring is not considered critical public service therefore benefits of the structural alternative to maintaining ESA monitoring mission would be minimal. In Appendix A-6 and related main report sections, the PDT included a discussion on the Atchafalaya Resilience Lab and its importance to the local community and natural resources. New structures built within the area would have to comply with NFIP regulations and be built above the Base Flood Elevation, or 100 year flood elevation and therefore would be excluded from the economic analysis. Section 308 of the Water Resource Development Act (WRDA) 1990 limits structures built or substantially improved after July 1, 1991 in designated floodplains not elevated to the 1% AEP flood elevation from being included in the benefit base of the economic analysis.
Public	21	Via email	Appendix A-8 St. Mary Excel agrees with the detailed protection needed for wetland function and wildlife diversity. Consideration should be included in the cost benefit ratio for the wetland function and wildlife diversity in the Morgan City levee project completion.	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Environmental	Wetland impacts are taken into account for the structural measures via mitigation requirements. Appendix A-2, Wetland and Cultural Costs and Assumptions, details costs estimates for wetland mitigation per structural measure. It is anticipated that the net effect on wetlands with a structural alternative would be negative.

Comment Source	Comment ID	Source	Comment	Commenter	Discipline	District Response to Comment
Public	22	Via email	The timeline for the Environmental Impact Statement is useful and beneficial once the Morgan City levee completion cost benefit ratio is reviewed in light of additional information provided to the USACE.	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Environmental	Per the National Environmental Policy Act (NEPA) and the Corps NEPA implementing regulations, the Draft feasibility report will be updated based on public comment, new information, and ongoing Corps investigations. Upon completion, the final feasibility report will be disseminated for a final public review. This will allow the public to see how their comments were integrated into the project planning and eventual preferred alternative.
Public	23	Via email	Appendix B – St. Mary Excel offers no engineering comments as our level of expertise is not in engineering. However, St. Mary Excel does make request to review the finalized review after the USACE delves into the additional information brought forth in the comment period.	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Environmental	Noted. The District will conduct a Final Environmental Impact Statement public review period once the report is finalized. This review will provide the public an opportunity to review how their comments were integrated into the project planning.
Public	24	Via email	page 33 – The USACE omitted Lake End Park, a City of Morgan City operated public recreation resource of the study area.	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Environmental	The Corps added Lake End Park to the main report as a recreation resource in the study area.
Public	25	Via email	page 136. The USACE omitted the Land Use Plan done by the Washington based Urban Land Institute. The plan is titled, Morgan City and Berwick: Building the Foundation for a New Economy along the Atchafalaya River. This current land use plan was conducted in September 2018 and was included in comments e-mailed to Carrie.G.Schott@usace.army.mil and Joseph.w.jordan@usace.army.mil in a November 9, 2019 correspondence.	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Environmental	The Corps has added the Washington based Urban Land Institute's Land Use Plan to its list of land use plans in the study area. The report also includes a description of this plan's intent and long term planning goals. The main report will also consider how the project alternatives would work with or in conflict with this plan.
Public	26	Via email	The USACE is to be commended for its process used for public comment inclusion.	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Environmental	Thank you. The Corps strives to include public participation for each phase of project planning.
Public	27	Via email	The USACE reporting of the November 8, 2018 public meeting held at the Morgan City Municipal Auditorium at 6 P.M. missed useful comments that would have provided useful input in the feasibility study. Four persons were listed as making an "appearance." They were: 1) Officer with the Corps, 2. Carla Sparks, Civilian Engineer, 3) Michael Brocato, SMLD, and 4) Monica Mancuso.	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Environmental	Noted.
Public	28	Via email	Here is the copied narrative showing that public input could have been more clearly recorded with so few people making comments in a well-staffed public meeting. [text from Appendix K, pages 24-26]. On page 31 [Appendix K, pages 31-34], the public responds. There are less than 5 St. Mary Parish residents providing comments. The USACE has a court reporter Elizabeth Rhodes McCleary that uses "unintelligible "7 times in recording the input from Michael Brocato and Monica Mancuso. ATTACHMENT A: E-mail sent to USACE with public hearing documents referenced in public hearing on November 8, 2018 in Morgan City, LA	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Environmental	The Corps strives to collect public comment as clearly and completely as possible. While the court reporter documentation was not perfect, it did allow for more detailed meeting documentation than if an untrained PDT member were taking notes. In subsequent meetings, the public was asked to directly speak to the court reporter so that their comments were captured in a clearer fashion.
Public	29	Via email	The USACE feasibility documents and the Tentatively Selected Plan do not reflect the submitted comments, which were clarified by e-mail. The purpose of the public hearing is for information to be considered in feasibility plan selection. St. Mary Excel encourages the USACE to review the provided input for aligning flood protection plans and courses of action by impacted populations. The submitted comments and documents reflect a position that structural flood protection (levees, flood walls, etc.) in Morgan City is a more feasible option.	Monica Mancuso, St. Mary Excel, a 501c 6 entity of the State of Louisiana	Environmental	Noted. A full analysis of the information collected at the public meetings is now included into the final report.
Public	30	Via email	Levee completion projects in Morgan City should be the USACE TSP. Morgan City levee completion was a Federal Emergency Management Agency (FEMA) recommendation occurring after Hurricane Andrew (1992). By definition, FEMA "coordinates the federal government's role in preparing for, preventing, mitigating the effects of, responding to, and recovering from all domestic disasters, whether natural or man-made, including acts of terror. FEMA can trace its beginnings to the Congressional Act of 1803." The TSP circumvents the hurricane response planning, work and expenditures already taking place in raising the levees around Morgan City. Without levee completion, specifically the Lakeside project, much of the FEMA recommended project has been wasted. Spent monies in this project should be a high consideration. Also, an assessment of the FEMA raised levees should take place before implementing a new plan and expending monies to voluntarily raise structures, a key recommendation in the current TSP.	Bart and Monica Manusco	Plan Form	Structural measures were assessed as separable elements for the Morgan City area, based on standard levee design criteria, and were determined not feasible due to the low benefit cost ratio. Expended funds to maintain and elevate the existing levee system within Morgan City are not allowable within the National Economic Development (NED) account.

Comment Source	Comment ID	Source	Comment	Commenter	Discipline	District Response to Comment
Public	31	Via email	The TSP fails to recognize that Congress in its Tax Cuts and Jobs Act of 2017 designated two census tracts in Morgan City as Opportunity Zones. The work of the U. S. Commerce Department and Internal Revenue Service is not considered although these departments detail rules for the reinvestment into structures in the census tracts. With the USACE considering the Opportunity Zone legislation, the Tentatively Selected Plan would have been the completion of the levee system around Morgan City.	Bart and Monica Manusco	Plan Form / Economics	USACE will review US Commerce Department and IRS determination of the Opportunity Zone additional detail will be added to the existing conditions descriptions. Further analysis on regional economic benefits will occur prior to finalization of the report. It is anticipated that regional economic benefits, including money from local contractors as a result of implementing the TSP. Federal regulations prevent the encouragement of future development in the floodplain and therefore it is not an objective of the study to improve structural economic development. Potential future development is not allowable within the National Economic Development (NED) account.
Public	32	Via email	The Draft Feasibility Study with Integrated Environmental Impact Statement of the TSP appropriately recognizes that estuaries, endangered species, historical/archaeological/architectural, etc. exist. However, the value to accessing the Atchafalaya National Heritage area along with its culture, habitat, and people has not been tabulated into the formula on which the TSP was selected. A more advanced algorithm that considers all factors should be used in this critical decision making process. A cost-benefit formula is not sufficient. An algorithm is needed that utilizes more qualitative sources of data such as those recognized through impact statements in the feasibility study. Morgan City and its protection through a FEMA certified levee system is needed to access, monitor, and protect the Atchafalaya heritage area through the locale and this factor should be heavily weighted in the algorithm.	Bart and Monica Manusco	Plan Form / Economics / Recreation	USACE policy does not allow for monetization of ecosystem benefits at this time. Impacts of the No Action alternative (Alternative 3) are described in Section 5. Ecosystem Restoration protection and enhancement was not included in the assessment due to funding authority. Potential future development is not allowable within the National Economic Development (NED) account.
Public	33	Via email	The TSP failed to include the land use study conducted in Fall 2018 by the Urban Land Institute (ULI), a Washington-based land management group offering land management services. The ULI panel of experts examined resilience to examine Sea Level Rise (SLR) of the Morgan City and Berwick area. One of the panel members was Garrett Avery. Mr. Avery has more than a decade of experience leading multi-disciplinary teams to create sustainable and resilient landscapes, water sensitive environments, and coastal saltmarsh and riverine restorations. He brought his expertise as a whole-systems advocate and leader in AECOM's NYC Metro Resilience Practice for this examination of the Morgan City and Berwick area. He was also one of the leaders in Hurricane Sandy response planning. A key recommendation from the ULI panel was made and is applicable to the TSP. The panel reported that improving long-term resilience and sustainability makes it "essential that Morgan City achieve and maintain Federal Emergency Management Agency (FEMA) LEVEE CERTIFICATION WITHOUT SHORTCUTS AND FOLLOW FEMA'S SUGGESTIONS TO ACHIEVE THE CERTIFICATION." (capital letters added for emphasis)	Bart and Monica Manusco	Plan Form / Economics	The Corps has added the Washington based Urban Land Institute's Land Use Plan to it's list of land use plans in the study area. The report also includes a description of this plan's intent and long term planning goals. The main report will also consider how the project alternatives would work with or in conflict with this plan. The purpose of the study was to evaluate and determine the feasibility of obtaining USACE federal funds. It is not USACE's recommendation that St. Mary parish remove its focus on levee completion. The TSP identifies actions that would met USACE criteria for USACE federal funding. St. Mary Parish Levee and Drainage District remains the management entity over the Morgan City levees and may move forward with future upgrades as deemed necessary.
Public	34	Via email	The USACE through the TSP suggests that the community of Morgan City remove its focus from levee completion to structure elevation. The shift in focus in the final stages of levee completion, the Lakeside project, is not warranted and is cavalier.	Bart and Monica Manusco	Plan Form	The purpose of the study was to evaluate and determine the feasibility of obtaining USACE federal funds. It is not USACE's recommendation that St. Mary parish remove its focus on levee completion. The TSP identifies actions that would met USACE criteria for USACE federal funding. St. Mary Parish Levee and Drainage District remains the management entity over the Morgan City levees and may move forward with future upgrades as deemed necessary.
Public	35	Via email	The USACE is requested to recognize the conundrum that mixed federal messages (FEMA recommends levee completion; USACE selects plan for voluntary elevating structures.) places on the rural and resource-challenged community of Morgan City.	Bart and Monica Manusco	Plan Form	The purpose of the study was to evaluate and determine the feasibility of obtaining USACE federal funds. It is not USACE's recommendation that St. Mary parish remove its focus on levee completion. The TSP identifies actions that would met USACE criteria for USACE federal funding. St. Mary Parish Levee and Drainage District remains the management entity over the Morgan City levees and may move forward with future upgrades as deemed necessary.

Comment Source	Comment ID	Source	Comment	Commenter	Discipline	District Response to Comment
Public	36	Via email	The FEMA project needs to be funded to completion, before another project such as structure elevation is embarked.	Bart and Monica Manusco	Plan Form	The purpose of the study was to evaluate and determine the feasibility of obtaining USACE federal funds. It is not USACE's recommendation that St. Mary parish remove its focus on levee completion. The TSP identifies actions that would met USACE criteria for USACE federal funding. St. Mary Parish Levee and Drainage District remains the management entity over the Morgan City levees and may move forward with future upgrades as deemed necessary.
Public	37	Via email	We need to complete the levees in St Mary Parish.	David A. Naquin, Director of OHSEP St. Mary	Plan Form	The purpose of the study was to evaluate and determine the feasibility of obtaining USACE federal funds. It is not USACE's recommendation that St. Mary parish remove its focus on levee completion. The TSP identifies actions that would met USACE criteria for USACE federal funding. St. Mary Parish Levee and Drainage District remains the management entity over the Morgan City levees and may move forward with future upgrades as deemed necessary.
Public	38	Via email	I am forwarding this email from Mike Brocato because I am in complete agreement with him. As a former board member of the St. Mary Parish Drainage District, where while serving on the board, we built and elevated around 5.5 miles of back water levees around the City of Morgan City to FEMA standards. We built these levees at a fraction of the cost that was originally estimated. This project is nearing completion and there are just a few stretches of levee that needs to be constructed to close the loop around Morgan City to provide total protection from storm surge, river flooding, and insurance hikes. Requiring these projects to meet HSDRRS standards after we have already spent millions of tax payers dollars on flood structures that are not built to HSDRRS standards is never going to be an option because of the extremely high cost and limited funding. We need to look at these projects with typical levee construction cost to see if they meet the benefit to cost ratio. Now that I serve as the Director of Public Works for St. Mary Parish I understand the need for other flood protection projects throughout the parish and how getting this funding would aid in getting some of the work we have already started complete.	Jean Paul Bourg, Director of Public Works, St. Mary parish	Plan Form / Engineering	Structural measures were assessed as separable elements for the Morgan City area, based on standard levee design criteria, and were determined not feasible due to the low benefit cost ratio. Expended funds to maintain and elevate the existing levee system within Morgan City are not allowable within the National Economic Development (NED) account.
Public	39	Via email	The foregoing in addition to your failure to account for the value of agricultural commodities is unacceptable.	Will Terry, St. Mary Parish	Plan Form / Engineering	Historical studies within the area resulted in agricultural benefits being approximately 5-10% of total benefits, which include damages to structures, contents, and vehicle. Alternatives that would have provided benefits to agriculture were far from justification requirements and therefore refinement of agricultural benefits was not completed.

6.2 AGENCY COMMENTS

CHITIMACHA
TRIBE OF LOUISIANA

January 27, 2012

Dear CWPPRA task force members,

This letter is to express the Chitimacha Tribe of Louisiana's support for project "PPL 22- Cote Blanche Freshwater & Sediment Introduction & Shoreline Protection Project". On January 25th, our Tribal Historic Preservation Officer, spoke at the nomination meeting in Morgan City, offering the following remarks on behalf of the Tribe.

"Good morning. My name is Kimberly Walden and I am the Tribal Historic Preservation Officer for, and a member of the Chitimacha Tribe of Louisiana. I am here to support the Cote Blanche project proposed in St. Mary Parish.

While the tribe supports all projects that protect Louisiana's coastline because they protect the Tribe's aboriginal lands and associated cultural resources, this project is especially important because it would protect the tribe's most important resource today, our land base of 1,000 acres, home of our nation in Charenton.

Our tribe is the only sovereign nation in Louisiana today to still occupy a portion of their aboriginal lands and we need help protecting our remaining lands and members from hurricanes, which would also benefit the residents and businesses of this area.

We also want to thank NRCS and the willing landowners associated with this project. Also, as Chairman of the St. Mary Tourist Commission, I am reminded of the other resources in the parish, the Atchafalaya National Heritage Area, the Black Bear Refuge, the historic main street and many other attractions and business that help the parish's economy through tourism revenue."

We sincerely hope that you will support this important project because of the many benefits that it will have for everyone in St. Mary Parish and everyone that enjoys what this area has to offer.

Thanks in advance for your thoughtful consideration of this project.

Sincerely,

John Paul Darden,
Chairman

155 Chitimacha Loop P. O. Box 661 Charenton, LA 70523 (337) 923-7215 FAX (337) 923-9914

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270-2102

December 30, 2019

Joseph Jordan
U.S. Army Corps of Engineers
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-2004

Dear Mr. Jordan:

The Region 6 office of the U.S. Environmental Protection Agency (EPA) has reviewed the U.S. Army Corps of Engineers South Central Coast Louisiana Draft Integrated Feasibility Report and Environmental Impact Statement (DIFR-EIS) CEQ No. 20190280. The DIFR-EIS was reviewed pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality regulations (40 CFR Parts 1500 – 1508), and by our NEPA review authority under Section 309 of the Clean Air Act.

The purpose of the DIFR-EIS is to investigate potential structural and nonstructural solution sets in terms of coastal storm risk management. Coastal storm risk management seeks to address coastal storm and flood risk to vulnerable populations, property, ecosystems, and infrastructure along the coast. The preferred alternative, or tentatively selected plan (TSP) would provide reduced flood risk for all structures in the study area with a First Floor Elevation at or below the 25-year stage based on predicted year 2025 hydrologic conditions. The TSP would reduce flood damage risks to a total of 3,463 structures.

We appreciate the opportunity to review the DIFR-EIS. EPA has no comment on the proposed plan. We look forward to the receipt of your Final EIS. If you have any questions, please contact Gabe Gruta, the project review lead, at 214-665-2174 or gruta.gabriel@epa.gov.

Sincerely,

Arturo J. Blanco
Director
Office of Communities, Tribes and
Environmental assessment

cc: Alice Kerl
CEMVN–PM–B
U.S. Army Corps of Engineers
New Orleans District
7400 Leake Avenue
New Orleans, LA 70118

From: Zimmerer, Gary
To: Jordan, Joseph W CIV (USA)
Subject: [Non-DoD Source] RE: South Central Coast Louisiana Feasibility Study with Integrated Draft EIS
Date: Thursday, November 21, 2019 2:04:53 PM

Joe,

Thanks for the update on the South Central LA Feasibility Study. Currently we do not have any plans to comment on this report. We do not have any concerns with it at this time.

Gary

Gary Zimmerer, P.E. (gary.zimmerer@fema.dhs.gov) Deputy
Director, Mitigation Division
FEMA Region 6
800 North Loop 288 | Denton, TX 76209 | 940.898.5161 c. 940-230-3952

-----Original Message-----
From: Jordan, Joseph W CIV (USA) <Joseph.W.Jordan@usace.army.mil> Sent:
Thursday, November 21, 2019 8:23 AM
To: Zimmerer, Gary <Gary.Zimmerer@fema.dhs.gov>
Cc: Noah Silverman - NOAA Federal <noah.silverman@noaa.gov>; Craig Gothreaux NMFS
<craig.gothreaux@noaa.gov>
Subject: South Central Coast Louisiana Feasibility Study with Integrated Draft EIS

Gary –

Here's a quick update on the South Central Coast Louisiana DEIS project...

1. The Public Review DEIS/Feasibility Report is hitting the streets this week. Any and all comments are welcome.

2. Due to the new reg, One Federal Decision, we have to send out 3 concurrence point letters to get the cooperating agencies buy-in on our planning. Attached is our 3rd (and last) concurrence point letter. It deals specifically with our preferred alternative. We are still going with the nonstructural alternative (home elevations and flood proofing nonresidential structures). You have 10 days to comment. After 10 days and we receive no comments, we assume you concur with our preferred alternative. I assume FEMA will not be sending a concurrence letter, and that is perfectly fine with me. Attached is an upfront copy of the letter we are sending. I am sending a similar letter to the FWS.

Joe

Joe Jordan
CEMVP-PD-C
US Army Corps of Engineers, Clock
Tower Building
P.O. Box 2004
Rock Island, IL 61 04-2004
(w) 309-794-5791

United States Department of the Interior

FISH AND WILDLIFE SERVICE
200 Dulles Drive
Lafayette, Louisiana 70506

December 9, 2019

Memorandum

To: Regional Environmental Officer, DOI,

From: Field Supervisor, Ecological Services, FWS, Lafayette, LA

Subject: South Central Coast Louisiana Study Draft EIS (ER 19/550)

The subject Feasibility Report and DEIS describe measures to provide non-structural storm surge protection for study area coastal communities.

The Fish and Wildlife Service (Service) has reviewed the subject document and offers no comments.

cc: FWS, Arlington, VA (BER/ERT)
FWS, Atlanta, GA (ES/PP)

Section 7

Comments Received During the Final Feasibility Report Public Review Period September 3, 2021 – October 4, 2021

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270-2102

October 4, 2021

Joseph Jordan
U.S. Army Corps of Engineers
Clock Tower Building
P.O. Box 2004
Rock Island, Illinois 61204-2004

Dear Mr. Jordan:

The U.S. Environmental Protection Agency (EPA) has reviewed the U.S. Army Corps of Engineers, Mississippi Valley Division, New Orleans District (CEMVN) South Central Coast Louisiana (SCCL) Final Integrated Feasibility Study and Environmental Impact Statement (EIS) (CEQ No. 20210131). The review is pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500 – 1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The SCCL Feasibility study investigated potential structural and nonstructural solution sets in terms of coastal storm risk management. Coastal storm risk management seeks to address coastal storm and flood risk to vulnerable populations, property, ecosystems, and infrastructure along the coast. Topography within the SCCL (parishes of St Mary, St. Martin, and Iberia) is low elevation, which combined with the area's, proximity to the Gulf of Mexico, subsiding lands, and rising seas, are contributing factors causing coastal flooding, shoreline erosion, and loss of wetlands. CEMVN's preferred alternative would provide reduced flood risk for all structures in the study area with a First Floor Elevation at or below the 25-year stage based on predicted year 2025 hydrologic conditions.

The EPA has no objection to this proposed action. We appreciate the opportunity to review this Final EIS. Once completed, please send our office one copy of the Record of Decision at the address above. If you have any questions, please contact Gabe Gruta, the project review lead, at 214-665-2174 or gruta.gabriel@epa.gov.

Sincerely,

ROBERT HOUSTON

Robert Houston
Staff Director
Office of Communities, Tribes and
Environmental assessment

SECTION 8

Comments Received During the Draft Supplemental Feasibility Report Public Comment Period April 1, 2022 – May 16, 2022

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270-2102

May 10, 2022

Joseph Jordan
U.S. Army Corps of Engineers
Clock Tower Building
P.O. Box 2004
Rock Island, Illinois 61204-2004

Re: South Central Coast Louisiana Supplemental Draft Feasibility with Integrated Environmental Impact Statement CEQ No. 20220042

Dear Mr. Jordan:

The Region 6 office of the U.S. Environmental Protection Agency (EPA) has reviewed the U.S. Army Corps of Engineers (USACE) Supplemental Draft Environmental Impact Statement (SDEIS), published April 1, 2022, for the South Central Coast Louisiana Integrated Feasibility Study. The study area encompasses over 2,966 square miles of varying terrain in the St. Martin, St. Mary, and Iberia Parishes. Majority of the study area borders Vermilion and West Cote Blanch Bays, both adjacent to the Gulf of Mexico. The Feasibility Study identifies the plans in providing flood risk reduction to St. Martin, St. Mary, and Iberia Parishes in South Central Louisiana. The USACE Recommended Plan would provide reduced flood risk for all structures in the study area with a First Floor Elevation at or below the 25-year stage based on predicted year 2025 hydrologic conditions. The review is pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500 – 1508), and our NEPA review authority under Section 309 of the Clean Air Act. Based upon our review of the environmental analysis provided in the SDEIS, EPA has no comments on the proposed action.

We appreciate the opportunity to review this document. If you have any questions, please contact Gabe Gruta, the lead contact for this project, at (214) 665-2174 or gruta.gabriel@epa.gov.

Sincerely,

ROBERT HOUSTON
Digitally signed by ROBERT HOUSTON
Date: 2022.05.10 10:38:52 -05'00'

Robert Houston
Staff Director
Office of Communities, Tribes and Environmental assessment