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SCOTT A. ANGELLE
SECRETARY

State of Louisiana
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF COASTAL RESTORATION AND MANAGEMENT

February 28, 2008

Gib Owen
U.S. Army Corps of Engineers
New Orleans District
P. O. Box 60267
New Orleans, LA 70160-0267

RE: **C20070619, Solicitation of Views**
New Orleans District, Corps of Engineers
Direct Federal Action
Draft Individual Environmental Report for IER #11 Improved Protection on the Inner Harbor
Navigation Canal, Orleans & St. Bernard Parishes, Louisiana

Dear Mr. Owen:

This office has received your January 31, 2008 Draft Report for IER #11 and we offer the following preliminary comments for your consideration in later phases of this proposed flood control project. Since project alternatives, and specific engineering features and environmental impacts and mitigation for those impacts have not been fully defined as yet, a final Consistency Concurrence must await submittal of a Consistency Determination as required by Section 307 of the Coastal Zone Management Act of 1972, as amended.

Beyond the well established need for 100-Year flood protection for the area, a major concern of this agency will be the effect of the project on wetlands, wetland function in the area, and the maintenance of estuarine use of the area by aquatic and marine organisms. The main wetland area potentially affected appears to be the Golden Triangle area cited on page 75 by the State Master Plan for a Sustainable Coast. The Proposed Action of the Draft Report for IER # 11 is to implement the Borgne 1 alternative. The westernmost alignment of the Borgne 1 alternative would have the least impact on the marshes of the Golden Triangle, but could result in the loss of up to 39 acres of bottomland hardwood of variable quality associated with construction of the GIWW gate and levee tie-ins. Movement of the Borgne 1 alignment and barrier into the Golden Triangle would result in an increase in marsh loss with a maximum of 2,786 acres of marsh loss for the easternmost alignment of the Borgne 1 alternative. Thus, a westerly alignment for Borgne 1 is recommended, if this alignment's decision factors are comparable to the other project alternatives.

Storm surge should be modeled for the various barrier alternatives to determine measures needed for 100 Year flood protection. The use of wave berms or breakwaters should be considered to reduce levee footprint and wetland loss and to reduce storm surge effects. Because the Lake Borgne alternatives 2 and 3 have larger footprints and would be more costly, and appear to have greater impacts on wetland and aquatic systems, they should only be considered favorably if storm surge cannot be effectively controlled with the Lake Borgne 1 alternative.

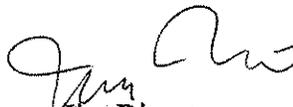
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The Proposed Action for IER #11 also includes a gated closure structure (Pontchartrain 2 alternative) where the IHNC enters Lake Pontchartrain that would be closed during severe storms. The Pontchartrain 2 alternative is located in a developed area which would result in little or no effect on the lake edge habitat or IHNC bottom or edges and should be implemented for this 100 year flood control project.

If you have any questions concerning this matter, please contact Brian Marcks of the Consistency Section at (225)342-7939 or 1-800-267-4019.

Sincerely yours,



Jim Rives
Administrator

JR/JH/bgm

cc: Laura Wilkinson, COE-NOD
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