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July 23, 2021

U.S. Army Corps of Engineers – New Orleans District
c/o Amy Dixon
CEMVN-PMR-C
7400 Leake Ave.
New Orleans, LA 70118

RE: Comments on St. Tammany Parish, Louisiana Feasibility Study Draft Environmental Impact Statement

Dear Ms. Dixon,

At Pontchartrain Conservancy (PC), our mission is to drive environmental sustainability and stewardship through scientific research, education, and advocacy. PC's policies and advocacy are grounded in science and it is for this reason, we respectfully urge you to consider the following recommendations for the Final Environmental Impact Statement (FEIS) for the St. Tammany Parish, Louisiana Feasibility Study.

With a stated goal of developing alternatives "to reduce flood damages caused by hurricane and rainfall events," modeling used to assess flood risk is the lens through which all the decisions made in the St. Tammany Parish Feasibility Study and Draft Environmental Impact Statement (DEIS) are viewed. After reviewing the DEIS, we have concluded that **PC cannot support the Tentatively Selected Plan (TSP) at this time.** Our primary concern with the study is the disconnect between riverine and rainfall modeling and the coastal flooding models. We believe this disconnect could create an inaccurate picture of the extent of flooding on the landscape.

We recognize and agree with the U.S. Army Corps of Engineers (USACE), that this is a complicated issue, and we do not take issue with the findings of the modeling results of the TSP's performance under the given model parameters. However, the exclusion of any analysis which couples surge flooding with riverine flooding models underestimates flood levels. This fact is stated in Appendix E: Hydrologic and Hydraulics Pg: 20

"*Coastal flooding damage was analyzed separately from the rainfall and river-based flood damage. Rainfall associated with tropical cyclones is not normally modeled within*

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ADCIRC, which likely results in underestimated flood levels and damages by some amount. This uncertainty is consistent across all the study alternative areas."

St. Tammany Parish regularly experiences extreme rainfall events in conjunction with storm surge. The DEIS lacks a critical element in the ability to accurately depict flood recurrence periods under any scenario. We would like the USACE to address this issue or give reason why no further consideration is given to include surge heights in the boundary conditions in the riverine flood models. Because major components of the TSP hinge on the 50-year recurrence interval, surge and riverine flooding must be considered simultaneously in order to properly analyze the viability of the TSP.

PC appreciates the opportunity to provide comments on this draft impact statement, and we look forward to continuing our partnership with ACOE to maintain an environmentally sustainable, prosperous, and resilient region in the Pontchartrain Basin.

Sincerely,

Kristi Trail, P.E.
Executive Director

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