US Army Corps of Engineers
Attention Project Management
CEMVN-PMR Room 331
7400 Leake Ave.
New Orleans, LA 70118

Dear Sir or Madam:

The Military Road Alliance is an organization of 14 subdivisions along Military Road in East Slidell. We represent over 5000 homes in the area. We have reviewed the St. Tammany Parish Feasibility Study and object to the proposal. This is especially true of the proposed actions taken in Ward 8 of St. Tammany Parish. Flood control recommendations contained therein would isolate potentially 3000 homes in the area. The proposal contained herein would shield these homes from potential flooding. The concerns are delineated below:

Non-structural

The US Army Corps of Engineers has proposed non-structural protection for 8,500 structures (6,600 residential and 1,900 non-residential structures). While praiseworthy, this elevation effort will be difficult and expensive. Additionally, implementation may take decades.

At a minimum, any plan must tie progress of the non-structural portion to the structural portion. The levee should not be built before the homes it puts at risk are protected.

This non-structural plan does not prevent or stop the loss of land in St. Tammany Parish and does not provide protection for supporting infrastructure such as utilities, roads, bridges, hospitals, businesses, Fire Departments, or Police.

Segment between Lakeshore Estates to Kingspoint

This area is extremely vulnerable to tropical storm surge impacts and requires comprehensive protection. For example, during hurricane Katrina, the storm surge exceeded 19 feet and devastated the Old Spanish Trail area in Slidell. This segment is critical to protecting Old Spanish Trail, Slidell, and Interstate 10.

The Corps' structural alignment presented in the Feasibility Study is the old Parish levee alignment. This is inadequate. Recommend modifying this alignment further east towards the W-14 Canal.

The better idea would be to provide comprehensive protection for the residences between the Lakeshore Village Levee and the Kingspoint Levee. This alignment would provide a gate and pump station for storm surge protection of Pirates Harbor Canal. Protection of this canal is critical for large and small events. For example, Hurricane Isaac flooded this area with a 7-foot tidal surge. This alignment would add costs but provide more protection and ensure an additional 37 residences, 1 commercial business and the associated neighborhood roadway infrastructure from the storm surge.

Segment between Kingspoint to Highway 190

The Corps proposal does not provide protection for the community south of Highway 190.

A better alignment will provide comprehensive protection for the residences affected by this levee. An alignment further east would provide protection between Highway 190 and the Kingspoint Levee for similar cost. This alignment would protect 2 Electrical Substations owned by Washington-St Tammany and Cleco. Protection of these substations are critically important as they provide electricity for the entire east side of Interstate 10. This alignment would also protect 60 residences and the associated neighborhood roadway infrastructure.

Segment between the levee at Highway 190 to Military Road

The current Corps' proposal does not protect French Branch and the Military Road Communities. Nor does it protect a critical Cleco substation or a Tammany Utilities facility which provides water and sewer treatment for the entire area. Notably, these areas have been prone to flooding in homes and businesses. We favor an alternate alignment that would protect these areas, the substation, and these vulnerable homes and businesses. Serious drainage issues that affect Doubloon Bayou and French Branch, need to be considered. Additionally, the plan fails to provide storm surge protection for over 3,000 homes in the Magnolia Forest, Quail Ridge, Turtle Creek, Cross Gates areas.

Alternative Proposal

A recommended alternative plan is to raise Highway 190 from where the new Slidell levee meets Military Road to the junction at Highway 90 and then east to

the West Pearl River Bridge. Additionally Highway 90 westbound to Highway 433 at the Rigolets must be raised. This option while more costly in the short run carries several distinct advantages.

- This plan would protect an additional 1500-2000 homes that would not be covered under the proposed Military road heightening. These homes would otherwise be at extreme flooding risk during a hurricane or tropical storm.

- Including these homes would likely result in lower flood insurance premiums, and flood claims payouts. Even a rough analysis valuing the potential damage of $250,000.00 per home, could result in a claims payout total of $375 million. This figure should offset any increased cost over the Corps' plan.

- Should these homes be flooded out and the insurance disbursed, many will be rebuilt in the same general area without any additional flood protection generating repeat losses to flood insurance providers every couple of decades.

- Some portion of this proposal could be tied into ongoing marsh restoration projects. Options for funding sources include:
    a. The Coastal Preservation and Restoration Authority and marsh restoration programs.
    b. The Army Corps of Engineers.
    c. Possible earmarks from the Congressional delegation.

<u>An Additional Recommended Alternative</u>

Another alternative plan that we feel should be seriously studied is the construction of a flood control levee along the CSX Railroad from New Orleans to Pass Christian MS. While this would be a major effort, it would protect large populations in two states with relatively little non-structural protections needed. Major stakeholders for this concept such as the CSX railroad, local Governments in Mississippi and local Governments in Louisiana are supportive of this alternative. Advantages include:

- No right of way or property mitigation required.
- Direct and significant financial benefits accrue from improved and safer rail travel to New Orleans and cities all along the Mississippi coast.

- Tidal flood mitigation to the entire Lake Pontchatrain Basin, Pearlington MS, Port Bienville MS, Waveland MS, Bay St. Louis MS, Diamondhead MS, the NASA facility at Stennis Space Center, and Pass Christian MS.
- Minimal negative impact on any existing structures. Almost all structures in Mississippi that would be outside of this levee are already raised as a consequence of Hurricane Katrina.
- Adaptable to future climate change/sea rise
- Significantly more financial support will be available since this alternative protects major residential, commercial and industrial areas in two states.
- There will be minimal environmental impact since the entire route of the proposed levee is along an existing rail line. Required flood control structures at the various waterways will have the advantage of copying existing environmentally friendly structures already built in Europe.

Request the Corps of Engineers issue rules pursuant to 5 U.S.C. § 553(e), to incorporate the provisions of this memorandum.

Pursuant to 5 U.S.C. § 555(e), please provide a brief statement of reasons for denial of any provision herein.

Sincerely,

Robert Broome

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Robert Broome
President, Military Road Alliance