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July 26, 2021

Attn: Marshall K. Harper, Chief
Environmental Planning Branch
United States Army Corps of Engineers
7400 Leake Avenue
New Orleans, LA 70118

RE: *Application Number: DIFR/DEIS St. Tammany Parish Feasibility Study*
Applicant: U.S. Army Corps of Engineers-New Orleans District
Notice Date: June 11, 2021

Dear Mr. Harper:

The professional staff of the Louisiana Department of Wildlife and Fisheries (LDWF) has reviewed the above referenced St. Tammany Parish Feasibility Study, which includes the Draft Integrated Feasibility Report (DIFR) and Draft Environmental Impact Statement (DEIS). Based on that review, LDWF offers the following:

The U.S. Army Corps of Engineers' (USACE) Tentatively Selective Plan (TSP) includes construction and operation of 16.3 miles of hurricane and storm damage risk reduction levee and floodwall sections in Slidell, Bayou Patassat channel improvements in Slidell, Mile Branch channel improvements in Covington, and nonstructural home elevations and flood proofing for approximately 15,800 structures across St. Tammany Parish. Structures proposed within the TSP include five pump stations, four gate complexes, one channel floodgate, and three sluice gates across various waterways.

LDWF is concerned with impacts to wetlands, streams, and other habitats, resulting from TSP implementation. Due to the limited information provided on TSP features and lack of associated detail, LDWF cannot fully understand impacts associated with the TSP at this time. Additional information including cross-sectional and plan view drawings and maps of all TSP features should be provided to resource agencies to convey a better understanding of all project features and aid in those agencies analyses of potential impacts. Information on the impacts to hydrology and operational plans for all water control structures should be developed and provided to resource agencies as well. It is our intent to ensure that hydrology is maintained to the greatest extent practicable and impacts to aquatic habitats are avoided and minimized to the greatest extent practicable.

If constructed, the TSP will directly and permanently impact Bayou Liberty and Mile Branch, both Louisiana designated Scenic Rivers. The TSP may also adversely impact a third Scenic River, the Tchefuncte River. The USACE should coordinate with LDWF Scenic Rivers Program staff during the design phase to ensure that impacts to Scenic Rivers are minimized and avoided to the greatest extent practicable and that any unavoidable impacts are appropriately mitigated.

For all planned impacts to Scenic Rivers, including Bayou Liberty and Mile Branch, a complete Scenic River permit application shall be provided to LDWF.

As stated in prior LDWF comments, the proposed channelization and clearing and snagging of Mile Branch currently outlined in Alternative 8 are prohibited by the Louisiana Scenic Rivers Act. LDWF certainly does not object to flood risk reduction measures to reduce risk to life and/or property. LDWF looks forward to continuing to work with USACE and Parish officials to develop solutions that provide flood risk reduction and maintain natural and free flowing streams.

The DIFR and DEIS should acknowledge and accurately analyze the full and permanent impacts to Mile Branch water quality and habitat resulting from the TSP. The TSP is expected to result in an oversized, deeply incised channel. Widely accepted channel evolution models show that the resulting channel will result in continuing erosion as the stream adjusts to bed lowering and increased contained flows. Remaining, natural floodplain will be disconnected, riparian habitat will be removed (and not replaced), aquatic habitats will be degraded. Higher water temperature and increased turbidity are expected to persist well into the future. Aesthetics will also be impacted. Although residential development is the dominant land use along the stream's riparian corridor, many reaches of the stream remain forested to various degrees and tracts of forested land and woodlots occur adjacent to the stream throughout much of its length.

Due to the Scenic River designation of Mile Branch and the expected impacts of the current TSP, the USACE should provide LDWF hydrological modeling demonstrating justification for the proposed dredging on Mile Branch. The USACE should also provide analysis of less damaging alternatives for addressing flooding along Mile Branch. Alternatives for Mile Branch should include the construction of off-channel detention ponds and channel improvements that incorporate Natural Channel Design and Engineering With Nature principles. When compared to the current plan, Priority 2 or 3 (Rosgen) restoration would result in improved natural functions and ecosystem services, reduced bank erosion, increased aquatic and riparian habitat, reduced water quality impacts, and reduced channel/project maintenance. The social benefit associated with dry detention and floodplain areas that can also serve as parks and public green space would be significant within the city of Covington and should be included in the CBA. The alternatives should also include a nonstructural alternative that analyses home elevations in lieu of the currently proposed channel improvements.

The report's *relevant resources* should include Scenic River's relevance beyond aesthetics. Section 3.2.2.4 should be expanded to more accurately represent the protections afforded by the Louisiana Scenic Rivers Act (The Act). Additionally, The Act was enacted in 1970, not in 1988 as stated in the draft report. To better inform the readers, where appropriate, the report should specifically indicate that Mile Branch is a designated Scenic River. Not all readers may realize that Mile Branch is a tributary of the Tchefuncte and thereby a Scenic River.

Impacts associated with some of the alternatives may have been inaccurately assessed within the report. For example, under Section 5.3.1.6, Wildlife impacts, Alternative 8 is reported to *directly result in the loss of a very small amount, under 1 acre, of forested habitat…due to construction activities*. However, other descriptions entail over 2 miles of bank clearing and grubbing ahead of significant dredging of 20 acres of stream channel, lowering the stream bed elevation by five feet. The impacts associated with these types of activities are fairly well understood and should be included.

The TSP's levee, pump station, and flood gate will permanently impact Bayou Liberty, a Scenic River and recreational destination for many on the Northshore. Levee impacts enumerated within

the report should be amended to show the associated impact to recreation and mitigation should be provided for those impacts.

TSP benefits may be overstated in some sections. For example, under *Wildlife Impacts*, Alternative 8 is reported to *likely stabilize terrestrial habitat that is being lost to erosion*. LDWF is concerned with this assessment. As described above, it is expected that Alt 8 will likely directly impact this habitat. Allowing the area to revegetate naturally (as proposed) will also allow invasive species such as Chinese tallow and Chinese privet to dominate the riparian corridor.

We are pleased to see that the proposed borrow site analysis indicated that no wetlands would be impacted from borrow; however, the borrow site analysis should also account for potential stream impacts. For example, STP-5 borders or contains a small stream that may not have been accounted for.

Rivers and streams should be included in the habitat types requiring mitigation. Coordination with resource agencies should occur to better define and assess impacts to streams not covered under the current analyses. Subsequently, the final report (and CBAs) should be amended to include mitigation for these habitats. The resulting, complete mitigation plan should be provided to LDWF and other resource agencies for review.

Mitigation for impacts should occur prior to or concurrent with construction of the TSP.

The LDWF Wildlife Diversity Program database indicates that the West Indian Manatee (*Trichechus manatus*) may occur in the surrounding waterbodies of the project footprint. The manatee is a large mammal that inhabits both fresh and salt water. Although the manatee is a year round resident of Florida and Central America, the species has been known to migrate to areas along the Atlantic and Gulf coasts during the summer months. The West Indian Manatee is a threatened species protected under the Endangered Species Act of 1973 and the Federal Marine Mammal Protection Act of 1972. In Louisiana, take or harassment of a manatee is a violation of state and federal laws. Critical habitat for the manatee includes beds of submerged aquatic vegetation (e.g., sea-grass beds). Areas with sea-grass beds should be avoided during project activities. Report all manatee sightings to the Louisiana Department of Wildlife and Fisheries at 504-286-4052 or 1-800-442-2511.

The Louisiana Department of Wildlife and Fisheries submits these recommendations to the U.S. Army Corps of Engineers in accordance with provisions of the Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.). Please do not hesitate to contact Habitat Section biologist, Chris Davis at 225-765-2642 should you need further assistance.

Sincerely,

Randell S. Myers
Assistant Secretary, Wildlife Division