September 6, 2023

USACE: New Orleans District
c/o Amy Dixon
CEMVN-PMR-C
7400 Leake Avenue
New Orleans, Louisiana 70118
Sent via email: sttammanyfs@usace.army.mil

RE: USACE St. Tammany Parish Feasibility Study Public Comment

To Whom it May Concern,

Please accept the following public comments concerning the USACE St. Tammany Parish Feasibility Study submitted by Northshore Riverwatch.[1] We request these comments submitted in a timely fashion be added to the public record. Northshore Riverwatch retains the right to use any public comments submitted by other interested parties.

While we do not oppose the Feasibility Study in itself, there are several issues surrounding the Slidell Levee and Miles Branch proposed actions which raise legitimate concerns. Each part will be addressed separately.

Slidell Levee

1. There are several working marinas and a shipyard upstream on Bayous Liberty and Bonfouca which will be negatively impacted by the height restrictions associated with the floodgates. The proposed restrictions will not allow sailboats currently using the marinas passage into and out of the Bayous, negatively impacting these thriving businesses.

2. The proposed footprint of the levee impacts several historical structures. The levee must be realigned to protect these properties.

3. Northshore Riverwatch has concerns that limiting the outflow from the protected side to floodgates will redirect historical sheet flow and groundwater flow directly into the marshes toward narrowed floodgate openings during normal intense rainfall resulting in a rise of Base Flood Elevation for the 1% storm. Raising the elevation of floodwaters will have negative impacts that could outweigh the benefits of the project. We request that during the engineering phase, the effects on BFE must be studied and the provisions of the National Flood Insurance Policy be followed to ensure no negative impacts due to inland rainfall.

[1] Northshore Riverwatch is a grassroot 501(C)(3) organization dedicated to the protection of rivers and floodplains in the Florida Parishes. Many of our members are directly affected by the proposed actions.

4. Northshore Riverwatch has concerns of increased flooding during storm events when the gates are closed. The F.S. indicates the 1% storm was studied, but we have had many storms in the gulf which surpass the 1% storm. A slow-moving tropical system can drop tens of inches of rain which would be trapped behind the levees. The proposed pump stations will have limited capacity which, when exceeded, could flood more of the area than the storm without the levee. This also needs to be addressed in the engineering phase.

5. Levees are designed to a specific intensity of storm. When the storm exceeds the design specification, there is a real possibility of levee overtopping, failure, and flooding. How long will it take to drain the dry-side of the system once the storm passes considering the overland flow is cut off. Will it be weeks before residents could return home? The proposed levee would not protect from a Kitrina type storm. The design must be for a 500-year or 1000-year storm to ensure protection of the residents.

6. Levees give a false sense of safety. Levees will be overtopped by strong storms that exceed the design specifications. The Gulf Coast is seeing more intense storms than in the past. Our concern is the proposed levee system will encourage inappropriate development in normally flood-prone areas on the dry side, placing more property and citizens at risk. Intense development and urbanization should not occur is areas that will be affected by levee failure.

7. Many of the residences that are most prone to tidal surge flooding in the area west of Slidell (Bayous Liberty, Pasquet and Bonfouca) have already been elevated to sufficient height to be protected form the designed surge elevations. Any home that has flooded with more than 50% damage should have been rebuilt to safe elevations. The fact that so many homes that flooded in storms have not been raised is a commentary on the ineffectual application of NFIP requirements by St. Tammany Parish and other governing bodies. The cost of raising the remaining homes subject to the design tidal surge may be more protective and cost effective than building an ecologically destructive levee.

Miles Branch

Miles Branch, as a tributary to the Little Tchefuncte River (local name for the section of the Tchefuncte River from its headwaters to its confluence with the Bogue Falaya River) is a Louisiana Scenic Stream and considered an Outstanding Natural Resource Water in and of itself. The CWA requires no degradation of its waters. The proposed Miles Branch clearing and dredging will lead to many adverse impacts, not just to the Branch itself, but also the main stem of the Tchefuncte.

1. Miles Branch is incised into the Pine-Savannah terrace with encompasses much of Southern St. Tammany and much of the Gulf Coast. The sandy-clay soils are extremely erodible. The mucking and dredging of Miles Branch will introduce

massive amounts of fine sediment into the system, impairing its designated use as an ONRW. The fine clay fraction of the soils remains suspended for miles downstream impacting both benthic and nektonic organisms.

2. Northshore Riverwatch has concerns that the transportation of the eroded soils could deposit in the mainstem of the Tchefuncte River just downstream of the confluence resulting in the need to dredge the excess sediment, further destroying an ONRW. Any impact that will require more action must be included in the cost/benefit analysis.

3. Dredging an extra 5 feet in highly erodible soils will affect the stability of the river system by surpassing the critical angle of repose for the soils. Deepening the channel will require armoring the sides which has its own very negative impacts.

4. While armoring Miles Branch with concrete will solve erosion issues and speed the discharge, it will result in the loss of the natural and beneficial filtering functions of the current system. The results of armoring will be more pollutants entering the already impaired Tchefuncte River. This is a step to completely urbanize the natural drainage system

5. The Draft Feasibility Study indicates the work on Miles Branch will cost approximately $77,000,000 to protect 250 homes. Many of these homes are older. A buy-out of the 250 homes would be more cost effective than the damaging actions proposed for Miles Branch. We request that a cost comparison to raising and/or buy-outs be completed prior to engineering.

6. There are other, more environmentally sensitive alternatives. One such alternative would be to widen the stream valley and floodplain to accommodate more water in a natural setting. Restoring Miles Branch to a natural stream state would be more beneficial to the residents of Covington and be used as an open space park for community access to the stream. Restoring the stream to a natural condition will improve environmental outcomes in the immediate vicinity and in the Tchefuncte River.

7. Northshore Riverwatch is concerned that increasing the rate of discharge from Miles Branch will have a negative affect on the BFE of the Tchefuncte River downstream from the confluence. A hydrological model must be produced showing the increased discharge will not raise flood heights for other residents on the Tchefuncte River.

September 6, 2023

Thank you for the opportunity to comment,

Matthew Allen

Executive Director: Northshore Riverwatch

Cc

Chris Davis: LDWF Scenic River Coordinator