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SECRETARY

State of Louisiana

DEPARTMENT OF NATURAL RESOURCES

OFFICE OF COASTAL MANAGEMENT

July 23, 2021

Amy Dixon
Corps of Engineers- New Orleans District
7400 Leake Avenue
New Orleans, LA 70118
Via email: sttammanyfs@usace.army.mil

RE: **C20210082,** Coastal Zone Consistency
New Orleans District, Corps of Engineers (COE)
Direct Federal Action
Notice of Availability, *St Tammany Parish Louisiana Feasibility Study*
St. Tammany Parish, Louisiana

Dear Ms. Dixon:

The Louisiana Department of Natural Resources, Office of Coastal Management (OCM) has reviewed the referenced document. As noted in the Feasibility Study, a consistency determination will be required for any activities associated with this project in order to comply with the Coastal Zone Management Act of 1972, as amended. The following comments are offered to assist in planning in order that the project will be consistent to the maximum extent practicable with the Louisiana Coastal Resources Program (LCRP).

• As described, the Tentatively Selected Plan will directly impact approximately 157 acres, and indirectly impact approximately 1,707 acres, of marsh, swamp, and Bottomland Hardwood habitat. In several areas the tentatively selected levee alignment crosses or encloses wetlands. The Coastal Use Guidelines at §703 includes the following:

B. Levees shall be planned and sited to avoid segmentation of wetland areas and systems to the maximum extent practicable.

D. Hurricane and flood protection levees shall be located at the nonwetland/wetland interface or landward to the maximum extent practicable.

F. Hurricane or flood protection levee systems shall be designed, built and thereafter operated and maintained utilizing best practical techniques to minimize disruptions of existing hydrologic patterns, and the interchange of water, beneficial nutrients, and aquatic organisms between enclosed wetlands and those outside the levee system.

OCM recommends that every effort be made to select a levee alignment that minimizes impacts to, or impoundment of, coastal wetlands.

• Clearing and dredging operations are proposed for Mile Branch. This is a designated Scenic Stream; authorization from the Louisiana Department of Wildlife and Fisheries will be required. Further, the proposed disposal of up to 130,000 yd^3 of material dredged from the channel is sidecast along the bank, or hauled off site. Coastal Use Guideline §707 states:

> B. Spoil shall be used beneficially to the maximum extent practicable to improve productivity or create new habitat, reduce or compensate for environmental damage done by dredging activities, or prevent environmental damage.

As planning proceeds, opportunities for beneficial use of this dredged material should be incorporated into the project wherever possible.

• Compensatory mitigation for unavoidable impacts should be performed within the same hydrologic basin where wetland impacts occur. Credits purchased from a mitigation bank must be from an OCM-approved mitigation bank that is located in the hydrologic basin where impacts occur or, when no bank is available in that basin, a mitigation bank credit purchase from a bank located in an adjacent basin.

OCM understands that, as planning continues and additional modeling is performed, plans will be developed to further reduce the potential environmental impacts of the project. OCM looks forward to coordinating with the Corps of Engineers to minimize impacts and ensure consistency with the LCRP.

Thank you for the opportunity to review and comment on this Feasibility Study. If there are questions concerning these remarks please contact Jeff Harris of the Consistency Section at (225) 342-7949 or jeff.harris@la.gov.

Sincerely,

/S/ Charles Reulet
Administrator
Interagency Affairs/Field Services Division

CR/MH/jdh

cc: Everard Baker, COE