



Morganza to the Gulf, Louisiana, Hurricane and Storm Damage Risk Reduction Project, Final Supplemental Environmental Impact Statement



Appendix L – Public Involvement

August 2026

The U.S. Department of War (DoW) is committed to making its electronic and information technologies accessible to individuals with disabilities in accordance with Section 508 of the Rehabilitation Act (29 U.S. Code 794d), as amended in 1998. For persons with disabilities experiencing difficulties accessing content, please use the form @ <https://dowcio.war.gov/508/Contact/> . In this form, please indicate the nature of your accessibility issue/problem and your contact information so we can address your issue or question. For more information about Section 508, please visit the DoW Section 508 website: <https://dowcio.war.gov/508/>.

EISX-202-00-MVN-1783435937

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Part 1: Notice of Intent

Separation from the Armed Forces of the United States,” is designed to collect the information necessary to retrieve the medical separation and Department of Veterans Affairs records and correct military personnel and pay records.

Affected Public: Individuals or households.

Annual Burden Hours: 180.

Number of Respondents: 240.

Responses per Respondent: 1.

Annual Responses: 240.

Average Burden per Response: 45 minutes.

Frequency: On occasion.

Dated: June 12, 2024.

Aaron T. Siegel,

Alternate OSD Federal Register Liaison Officer, Department of Defense.

[FR Doc. 2024–13461 Filed 6–18–24; 8:45 am]

BILLING CODE 6001–FR–P

DEPARTMENT OF DEFENSE

Office of the Secretary

[Docket ID: DoD–2024–OS–0067]

Proposed Collection; Comment Request

AGENCY: Office of the Under Secretary of Defense (Comptroller)/Chief Financial Officer, Department of Defense (DoD).

ACTION: 60-Day information collection notice.

SUMMARY: In compliance with the *Paperwork Reduction Act of 1995*, the Defense Finance and Accounting Service announces a proposed public information collection and seeks public comment on the provisions thereof. Comments are invited on: whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; the accuracy of the agency’s estimate of the burden of the proposed information collection; ways to enhance the quality, utility, and clarity of the information to be collected; and ways to minimize the burden of the information collection on respondents, including through the use of automated collection techniques or other forms of information technology.

DATES: Consideration will be given to all comments received by August 19, 2024.

ADDRESSES: You may submit comments, identified by docket number and title, by any of the following methods:

Federal eRulemaking Portal: <http://www.regulations.gov>. Follow the instructions for submitting comments.

Mail: Department of Defense, Office of the Assistant to the Secretary of Defense

for Privacy, Civil Liberties, and Transparency, Regulatory Directorate, 4800 Mark Center Drive, Mailbox #24, Suite 08D09, Alexandria, VA 22350–1700.

Instructions: All submissions received must include the agency name, docket number and title for this **Federal Register** document. The general policy for comments and other submissions from members of the public is to make these submissions available for public viewing on the internet at <http://www.regulations.gov> as they are received without change, including any personal identifiers or contact information.

FOR FURTHER INFORMATION CONTACT: To request more information on this proposed information collection or to obtain a copy of the proposal and associated collection instruments, please write to Enterprise Standards and Solutions, Disbursing, Defense Finance and Accounting Services (DFAS), 8899 E 56th Street, Indianapolis, IN 46249–0201, POC: Kellen Stout (DFAS IMCO), (317) 212–1801.

SUPPLEMENTARY INFORMATION:

Title: *Associated Form; and OMB Number:* Waiver/Remission of Indebtedness Application; DD Form 2789; OMB Control Number 0730–0009.

Needs and Uses: The information collected on this form will be used by the DFAS to determine whether there is indication of fraud, misrepresentation, fault, or lack of good faith, and whether it is in the best interest of the United States to forgive the debt. It will also be used to determine if a debtor should have been reasonably aware of the overpayment when it occurred. If a request for waiver is denied, the debt collection office (DCO) (usually the payroll office) will continue or resume collection if collection action was previously suspended. If a request for waiver is approved, then the DCO must cancel any outstanding portion of the debt and refund any portion of the debt that may have been collected prior to waiver approval.

Affected Public: Individuals or households.

Number of Respondents: 4,500.

Responses per Respondent: 1.

Annual Responses: 4,500.

Average Burden per Response: 80 minutes.

Annual Burden Hours: 6,000.

Frequency: On occasion.

Dated: June 12, 2024.

Aaron T. Siegel,

Alternate OSD Federal Register Liaison Officer, Department of Defense.

[FR Doc. 2024–13459 Filed 6–18–24; 8:45 am]

BILLING CODE 6001–FR–P

DEPARTMENT OF DEFENSE

Department of the Army, Corps of Engineers

Notice of Intent To Prepare a Supplemental Environmental Impact Statement to the Revised Programmatic Environmental Impact Statement (RPEIS) for the Morganza to the Gulf of Mexico, Louisiana, Hurricane and Storm Damage Risk Reduction Project (MTG)

AGENCY: U.S. Army Corps of Engineers, Department of the Army, DoD.

ACTION: Notice of intent.

SUMMARY: The U.S. Army Corps of Engineers (USACE), Mississippi Valley Division, New Orleans District (CEMVN), is announcing its intent to prepare a Supplemental Environmental Impact Statement (SEIS) to evaluate design changes to the authorized MTG project to meet the one percent Annual Exceedance Probability (AEP) Storm Surge Risk Reduction (100-year level of risk reduction (LORR)). This EIS supplements the Revised Programmatic EIS (RPEIS), MTG, Louisiana, that was integrated with the 2013 Final Post Authorization Change Report (PACR). The 2013 Integrated RPEIS and PACR was approved in the Chief’s Report that was signed July 8, 2013. The Record of Decision (ROD) was signed on December 9, 2013.

DATES: All comments and suggestions must be submitted by July 22, 2024.

ADDRESSES: To ensure the Corps has sufficient time to consider public input in the preparation of the Draft EIS, scoping comments should be submitted by email at mvnenvironmental@usace.army.mil, by surface mail to U.S. Army Corps of Engineers, U.S. Army Corps of Engineers, New Orleans District, Attn: CEMVN–PDC–C, 7400 Leake Avenue, New Orleans, Louisiana 70118, or at the Scoping Meeting(s).

FOR FURTHER INFORMATION CONTACT:

Questions and scoping comments regarding the proposed action should be directed to Ms. Sandra Stiles at U.S. Army Corps of Engineers, New Orleans District, Attn: CEMVN–PDS, 7400 Leake Avenue, New Orleans, Louisiana 70118, by phone (504) 862–2862, or by email at Sandra.E.Stiles@usace.army.mil.

SUPPLEMENTARY INFORMATION:

Background: The MTG hurricane and storm damage risk reduction project is a levee system located approximately 60 miles southwest of New Orleans, Louisiana and includes most of Terrebonne Parish and a portion of Lafourche Parish between the Terrebonne Parish eastern boundary and

Bayou Lafourche. The purpose of this project is to reduce the risk of damage caused by hurricane storm surges. A review of the project is needed because of the increasing susceptibility of coastal communities to storm surge due to wetland loss, sea level rise, and subsidence. The MTG Project was initially authorized by Section 1001(24) of the Water Resources Development Act (WRDA) of 2007 (Pub. L. 110–114) in accordance with the Reports of the Chief of Engineers dated 23 August 2002 and 22 July 2003, at a total cost of \$886.7 million. The project was redesigned in the 2013 Integrated RPEIS and PACR Report, both to address the project cost increase beyond the statutory limitation in accordance with Section 902 of the WRDA of 1986, as amended, and to meet updated post-Hurricane Katrina design guidelines. The MTG Project was subsequently re-authorized by Section 7002(3)5 of the WRRDA of 2014 (Pub. L. 113–121) in accordance with the Report of the Chief of Engineers dated 8 July 2013, at an updated total cost of \$10,265,100,000. The MTG project was authorized to provide the 1% AEP level of hurricane and storm damage risk reduction while maintaining navigational passage and tidal exchange. The project consists of approximately 98 miles of levee including associated navigation, roadway, pump station fronting protection, and environmental control structures. The 2013 RPEIS provided an assessment for both programmatic and constructible features for the MTG project. Constructible features consisted of those project features that were determined to have sufficient design details to be constructed. Constructible features included levee reaches F1, F2, G1; the HNC Lock; and the Bayou Grand Caillou Floodgate. The remaining features were designed to a programmatic design level that would require supplemental National Environmental Policy Act (NEPA) documentation prior to construction. The mitigation plan for the constructible features included restoration of 427 acres of intermediate marsh, 358 acres of brackish marsh and 975 acres of saline marsh.

This SEIS will disclose the context and intensity of environmental impacts, including indirect and cumulative effects, for the final array of levee alignments and associated features. Any required mitigation will also be discussed.

Alternatives: The SEIS will evaluate the PACR alignment as identified in the 2013 Integrated RPEIS and PACR Report to include a reasonable range of alignment modifications that considers

existing levee alignments, the least environmental damaging preferred alignment maximizing avoidance and minimization measures to sensitive habitats as well as the no action alternative. Major Features of the project include: (1) Approximately 98 miles of earthen levee, with final levee elevations ranging from 15 feet to 26.0 feet North American Vertical Datum 1988 (NAVD88) plus overbuild and final levee widths from approximately 146 to 446 feet; (2) The Houma Navigation Canal lock complex (HNC Lock) with lock sill depth of – 18 feet; (3) Construction on navigable waterways of 21 other floodgates such as stop log gates, barge gates, and sector gates; (4) Environmental water control structures at numerous locations within the levee system. Each control structure would consist of one or more culverts with gates that allow for tidal exchange; (5) Measures to offset the potential for increased water levels on the existing Larose to Golden Meadow project.

Summary of Expected Effects: The SEIS will analyze the potential impacts on the human and natural environment resulting from the proposed actions for the Project. The scoping, public involvement, and interagency coordination processes are requesting data and information to help identify and define the range of potential significant issues that will be considered. Resources and issues that may be significantly impacted may include tidal wetlands and other waters of the U.S.; aquatic resources; essential fish habitat; threatened and endangered species and their critical habitats; cultural resources; soils; navigation and navigable waters; transportation and traffic; hydrology and hydraulics; induced flooding; environmental justice; and cumulative effects of related projects in the regional area.

Environmental Reviews and Consultation Requirements: The alternatives are being coordinated with federal, state, regional, and local agencies. In accordance with relevant environmental laws and regulations, USACE will consult with the following agencies some of which may also serve as cooperating or participating agencies in the EIS preparation: Department of Interior's U.S. Fish and Wildlife Service (USFWS) under the Fish and Wildlife Coordination Act; USFWS and National Oceanic and Atmospheric Administration's (NOAA) under the Endangered Species Act; National Marine Fisheries Service (NMFS) under the Magnuson-Stevens Fishery Conservation and Management Act; Louisiana's Department of Natural Resources (LDNR) under the Coastal

Zone Management Act; and Louisiana Department of Environmental Quality (LDEQ) under the Clean Water Act, Section 401 Water Quality Certification; and, the Advisory Council on Historic Preservation (ACHP), Louisiana's Historic Preservation Office (SHPO), and appropriate Tribal Historic Preservation Officers under the National Historic Preservation Act (NHPA) using an integrated NHPA Section 106/NEPA EIS process.

NEPA Schedule: The draft SEIS is presently scheduled to be available for public review and comment in June 2025. A 45-day public review period will be provided for interested parties and agencies to review and comment on this draft document. All interested parties are encouraged to respond to this notice and provide a current address if they wish to be notified of the Draft EIS circulation. A Record of Decision would be approved and signed no earlier than 30 days after the Final EIS is published.

Public Involvement and Scoping: The following agencies are being invited as Cooperating Agencies on the SEIS: Environmental Protection Agency (EPA), USFWS, NMFS, U.S. Department of Agriculture's Natural Resources Conservation Service (NRCS), ACHP, Louisiana's SHPO, LDNR, Louisiana's Department of Wildlife and Fisheries (LDWF), and Louisiana's Coastal Protection and Restoration Authority.

USACE invites all affected federal, state, and local agencies, affected Federally recognized Indian Tribes, other interested parties, and the general public to participate in the National Environmental Policy Act (NEPA) process during development of the DEIS. Besides providing information, this notice requests input on alternatives and issues of concern.

To ensure that public comments are considered in the DEIS preparation process, members of the public, interested persons and entities must submit their comments to USACE by mail, email, or at the Scoping Meeting(s). All comments and suggestions must be submitted by July 22, 2024. All personally identifiable information (for example, name, address, etc.) voluntarily submitted by a commenter may be publicly accessible. Do not submit confidential business information or otherwise sensitive or protected information.

Scoping meeting(s) could be held during the scoping period which extends to July 22, 2024, to present information and receive comments from the public. Notification of the meeting(s) will be publicly announced in advance by USACE through press releases, special public notices, USACE social

media platforms, and the project website <http://www.mvn.usace.army.mil/About/Projects/Morganza-to-the-Gulf/>.

James A. Bodron,
Programs Director, Mississippi Valley Division.

[FR Doc. 2024–13480 Filed 6–18–24; 8:45 am]

BILLING CODE 3720–58–P

DEPARTMENT OF EDUCATION

President's Board of Advisors on Historically Black Colleges and Universities

AGENCY: President's Board of Advisors on Historically Black Colleges and Universities, Office of Secretary, Department of Education.

ACTION: Notice. Cancelled open public meeting.

SUMMARY: This notice is to advise members of the public of the cancellation of the open meeting of the President's Board of Advisors on Historically Black Colleges and Universities scheduled to be held on June 20, 2024 at 10:30 p.m. (EDT). The open meeting was announced in the **Federal Register** on Monday, May 20, 2023, in FR Doc. 2024–10920 page 43840–43841.

FOR FURTHER INFORMATION CONTACT: Sedika Franklin, Associate Director/ Designated Federal Official, U.S. Department of Education, White House Initiative on Historically Black Colleges and Universities, 400 Maryland Avenue SW, Washington, DC 20204; telephone: (202) 453–5634 or (202) 453–5630, or email sedika.franklin@ed.gov.

Alexis Barrett,
Chief of Staff, Office of the Secretary.

[FR Doc. 2024–13484 Filed 6–18–24; 8:45 am]

BILLING CODE 4000–01–P

DEPARTMENT OF EDUCATION

Tests Determined To Be Suitable for Use in the National Reporting System for Adult Education

AGENCY: Office of Career, Technical, and Adult Education, Department of Education.

ACTION: Notice.

SUMMARY: The Secretary announces tests, test forms, and delivery formats that the Secretary determines to be suitable for use in the National Reporting System for Adult Education (NRS). This notice relates to the approved information collections under

OMB control numbers 1830–0027 and 1830–0567.

FOR FURTHER INFORMATION CONTACT: John LeMaster, Department of Education, 400 Maryland Avenue SW, Washington, DC 20202. Telephone: 202–987–0903. Email: John.Lemaster@ed.gov.

If you are deaf, hard of hearing, or have a speech disability and wish to access telecommunications relay services, please dial 7–1–1.

SUPPLEMENTARY INFORMATION: On January 14, 2008, we published in the **Federal Register** final regulations for 34 CFR part 462, Measuring Educational Gain in the National Reporting System for Adult Education (73 FR 2305, January 14, 2008, as amended at 81 FR 55552, August 19, 2016) (NRS regulations). The NRS regulations established the process the Secretary uses to determine the suitability of tests for use in the NRS by States and local eligible providers. We annually publish in the **Federal Register**, and post on the internet at www.nrsweb.org, a list of the names of tests and the educational functioning levels the tests are suitable to measure in the NRS as required by § 462.12(c)(2).

On August 7, 2020, the Secretary published in the **Federal Register** (85 FR 47952) an annual notice consolidating information from previous notices that announced tests determined to be suitable for use in the NRS, in accordance with § 462.13 (August 2020 annual notice). Also, in the August 2020 annual notice, the Secretary announced that English as a Second Language (ESL) tests and test forms approved for an extended period through February 2, 2021, are approved for an additional extended period through February 2, 2023, and that an Adult Basic Education (ABE) test and test forms previously approved for a three-year period through March 7, 2021, are approved for an extended period through March 7, 2023.

On December 6, 2021, the Secretary published in the **Federal Register** (86 FR 69021), an annual notice with the same list of approved tests and test forms as was published in the August 2020 annual notice.

On September 23, 2022, the Secretary published in the **Federal Register** (87 FR 58078) an annual notice announcing that ESL tests and test forms previously approved for an extended period through February 2, 2023, were approved for an additional extended period through February 2, 2024, and that an ABE test and test forms previously approved for an extended period through March 7, 2023, were

approved for an additional extended period through March 7, 2024.

On July 13, 2023, the Secretary published in the **Federal Register** (88 FR 44784) an annual notice announcing new tests that were determined to be suitable for use in the NRS, in accordance with § 462.13 (July 2023 annual notice). Three tests measured the NRS educational functioning levels for ABE at the ABE levels specified in the July 2023 annual notice, and four tests measured the new NRS educational functioning levels for ESL at the ESL levels specified in the July 2023 annual notice. With the Secretary's approval of the new ESL tests in the July 2023 annual notice, the new educational functioning levels for ESL described in Appendix A of Measures and Methods for the National Reporting System for Adult Education (OMB Control Number: 1830–0027) were implemented. In the July 2023 annual notice, the Secretary announced that ESL tests with NRS approvals expiring on February 2, 2024, may be used in the NRS during a sunset period ending on June 30, 2024.

On August 24, 2023, the Secretary published a notice in the **Federal Register** (88 FR 57949) correcting the name of one test listed in the July 2023 annual notice. All other information in the July 2023 annual notice remained the same.

On March 18, 2024, the Secretary published in the **Federal Register** (89 FR 19307) a notice announcing that the sunset period for ESL tests scheduled to sunset on June 30, 2024, is extended through June 30, 2025. This extension of the sunset period will allow States sufficient time for the operational activities required for the transition to the new ESL assessments identified in the July 2023 annual notice.

The ESL educational functioning level descriptors to which the ESL tests with expiring NRS approvals are aligned and that were scheduled to be retired on June 30, 2024, are extended through June 30, 2025. Until that time, both the current ESL educational functioning level descriptors and the new ESL educational functioning level descriptors will be in effect. States must use an ESL assessment that is aligned to the appropriate ESL educational functioning level descriptors.

In this notice, the Secretary announces two new tests and test forms that have been determined to be suitable for use in the NRS, in accordance with § 462.13. The tests measure the NRS educational functioning levels at all ABE and ESL levels, as described in Appendix A of Measures and Methods for the National Reporting System for Adult Education (OMB Control Number

Part 2: Scoping Meetings



PRESS RELEASE

U.S. ARMY CORPS OF ENGINEERS

BUILDING STRONG®

For Immediate Release:
July 1, 2024

Public Affairs: Melanie Oubre
(504) 862-2587
Melanie.E.Oubre@usace.army.mil

Public Scoping Meetings scheduled for Morganza to the Gulf

Meetings will gather public input for the Morganza to the Gulf Project

NEW ORLEANS – The U.S. Army Corps of Engineers announced three public scoping meetings will be held on the Morganza to the Gulf (MTG) Supplemental Environmental Impact Statement (SEIS).

The SEIS will evaluate design changes to the authorized MTG project to meet the one percent Annual Exceedance Probability (AEP) Storm Surge Risk Reduction (100-year level of risk reduction).

Public Meeting Schedule:

Tuesday, July 30th, 2024
North Lafourche Levee District
3862 Highway 1, Raceland, LA 70394
6 p.m. – 8 p.m.

Thursday, August 1st, 2024
Montegut Fire Station
1105 LA-55, Montegut, LA 70377
6 p.m. – 8 p.m.

Monday, August 5th, 2024
Barry P. Bonvillain Civic Center
346 Civic Center Blvd., Houma, LA 70360
6 p.m. – 8 p.m.

Each meeting will feature a short presentation and open house where the public can ask questions of and give feedback to USACE employees. A virtual meeting will be scheduled at a later date. The public will be notified via press release, social media, and the USACE website.

Background: The MTG hurricane and storm damage risk reduction project is a levee system located approximately 60 miles southwest of New Orleans, Louisiana and includes most of Terrebonne Parish and a portion of Lafourche Parish between the Terrebonne Parish eastern boundary and Bayou Lafourche. The purpose of this project is to reduce the risk of damage caused by hurricane storm surges.

A review of the project is needed because of the increasing susceptibility of coastal communities to storm surge due to wetland loss, sea level rise, and subsidence. The MTG Project was initially authorized by Section 1001(24) of the Water Resources Development Act (WRDA) of 2007 in accordance with the Reports of the Chief of Engineers dated 23 August 2002 and 22 July 2003, at a total cost of \$886.7 million.

The project was redesigned in the 2013 Integrated Revised Programmatic EIS (RPEIS) and Post Authorization Change Report, both to address the project cost increase beyond the statutory limitation in accordance with Section 902 of the WRDA of 1986, as amended, and to meet updated post-Hurricane Katrina design guidelines. The MTG Project was subsequently re-authorized by Section 7002(3)5 of the Water Resources

U.S. ARMY CORPS OF ENGINEERS

7400 Leake Avenue, New Orleans, LA 70118 | www.mvn.usace.army.mil
www.facebook.com/usacenola
www.twitter.com/teamneworleans

Reform and Development Act of 2014 in accordance with the Report of the Chief of Engineers dated 8 July 2013, at an updated total cost of \$10,265,100,000.

The MTG project was authorized to provide the 1% AEP level of hurricane and storm damage risk reduction while maintaining navigational passage and tidal exchange. The project consists of approximately 98 miles of levee including associated navigation, roadway, pump station fronting protection, and environmental control structures. The 2013 RPEIS provided an assessment for both programmatic and constructible features for the MTG project. Constructible features consisted of those project features that were determined to have sufficient design details to be constructed. Constructible features included levee reaches F1, F2, G1; the HNC Lock; and the Bayou Grand Caillou Floodgate. The remaining features were designed to a programmatic design level that would require supplemental National Environmental Policy Act documentation prior to construction. The mitigation plan for the constructible features included restoration of 427 acres of intermediate marsh, 358 acres of brackish marsh and 975 acres of saline marsh.

This SEIS will disclose the context and intensity of environmental impacts, including indirect and cumulative effects, for the final array of levee alignments and associated features. Any required mitigation will also be discussed.

The public scoping period is extended until August 26, 2024. Comments must be submitted by this date to ensure they are considered in the planning of the project and captured in the Scoping Report.

Scoping comments can be submitted during the public meetings or by mail to:

U.S. Army Corps of Engineers, New Orleans District
Attn: CEMVN-PDS
7400 Leake Avenue, New Orleans, Louisiana 70118.
Or email: mvnenvironmental@usace.army.mil

Questions regarding the proposed action should be directed to Ms. Sandra Stiles:

U.S. Army Corps of Engineers, New Orleans District
Attn: CEMVN-PDS, 7400 Leake Avenue, New Orleans, Louisiana 70118
Phone (504) 862-2862
Email Sandra.E.Stiles@usace.army.mil

For more information on the Morganza to the Gulf project, visit
<https://www.mvn.usace.army.mil/About/Projects/Morganza-to-the-Gulf/>

###

MORGANZA TO THE GULF OF MEXICO, LOUISIANA

SCOPING PUBLIC MEETING

July/August 2024



Stakeholders:



US Army Corps
of Engineers®





AGENDA

- Meeting Purpose
- Introductions
- The National Environmental Policy Act (NEPA) Process
- Project Overview
- Alternatives Considered
- Opportunities to Comment





OPENING REMARKS



Col. Cullen A. Jones, PMP, P.E.
Commander
New Orleans District
United States Army Corps of
Engineers



MEETING PURPOSE - CONDUCT SCOPING

Inform

- Provide background on USACE Study
- Ongoing collaboration efforts
- Authorized Project and Alternatives

Solicit Input – We want to hear from you

- Identify Problems and Concerns, unique habitat or things to be aware of
- Advise on solutions, feature/alternative considerations
- Problems or solutions we may have missed



US Army Corps
of Engineers®



NLLD
North Lafourche Levee District



COLLABORATION WITH OTHERS

Non-Federal Sponsor

- **Louisiana Coastal Protection and Restoration Authority Board**

Governmental Stakeholders

- Natural Resource Agencies
- State of Louisiana and State Agencies
- Terrebonne Levee, Drainage and Conservation District
- City Officials

Considered/reviewed/incorporated previous and ongoing studies and recommendations





WHAT IS NATIONAL ENVIRONMENTAL POLICY ACT?

The National Environmental Policy Act (NEPA) is a law that requires federal agencies to assess the environmental effects of their proposed actions prior to making decisions.

- Part of that process is obtaining public input and hearing comments.

Goals of NEPA?

- Requires Federal agencies to consider their actions and decisions with respect to the environment.
- Ensure public and other agency involvement in the decision-making process.

How is USACE complying with NEPA?

- Conducting an analysis of the effects of the proposed action on the environment and preparing an Environmental Impact Statement (EIS)
- Reaching out to public and agencies for input.

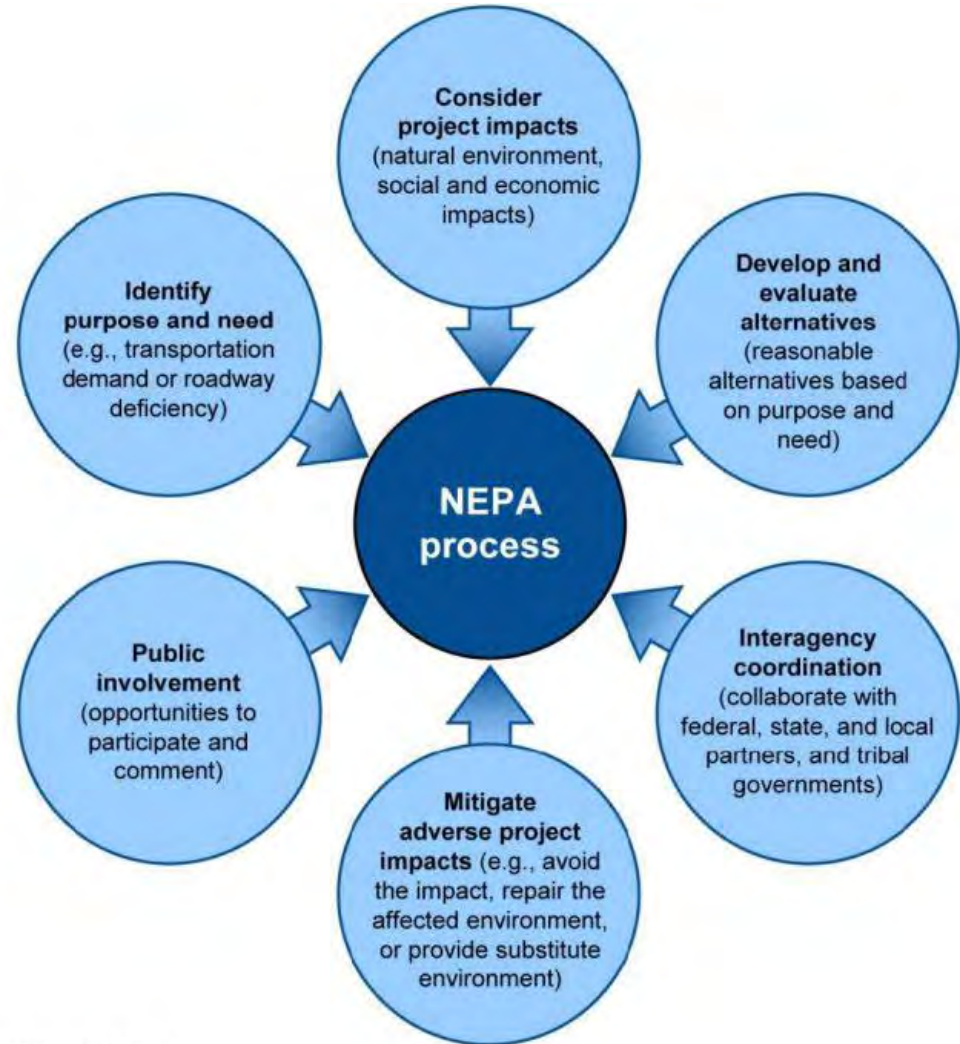




NATIONAL ENVIRONMENTAL POLICY ACT



- Requires all federal agencies to:
 - ❖ consider the environmental impacts of any proposed action;
 - ❖ develop a range of alternatives;
 - ❖ provide opportunities for the public to provide input; and
 - ❖ document the decision-making process so that interested and affected stakeholders can understand how the agency came to a decision.

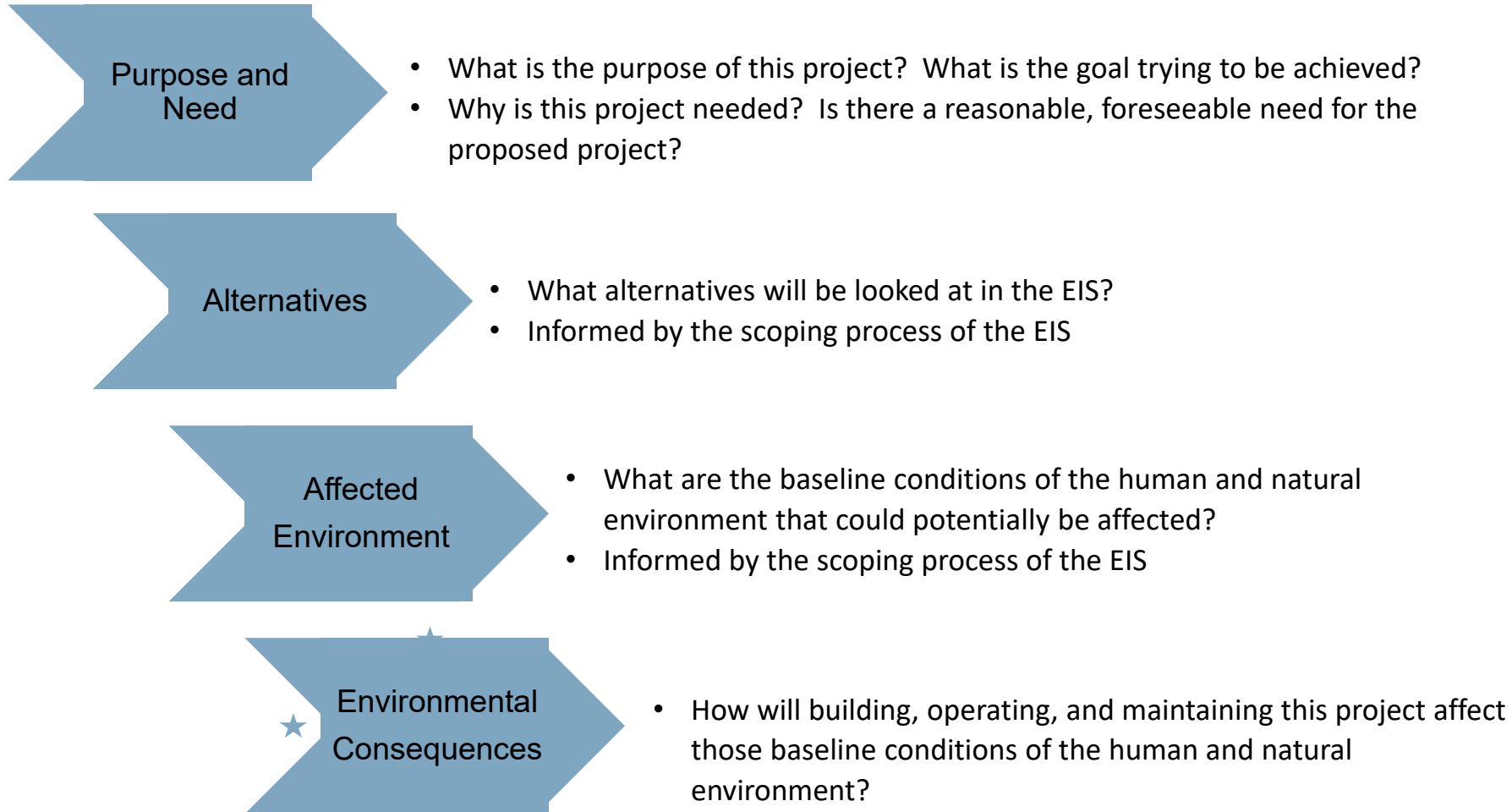


Source: GAO. | GAO-15-71





WHAT IS AN ENVIRONMENTAL IMPACT STATEMENT?



★ The public is given an opportunity to respond to the Draft EIS. This is where we are today.





AUTHORIZATION HISTORY

1992	Study Authorized
WRDA 2007	Construction Authorized - \$886.7M (72-mile system)
8 JUL 2013	PAC Report approved
WRRDA 2014	Reauthorized 2013 - \$10.3B (first costs; 98-mile system)
2019	Memorandum of Understanding
DEC 2021	Cost updated - \$6.5B (first costs) with \$3.2B Federal investment
28 DEC 2021	Partnership Agreement - USACE, CPRA, and TLCD
	EDR?





AUTHORITY





AUTHORIZED PACR FEATURES

- 98-miles of earthen levee,
- 22 floodgates on navigable waterways,
- 23 environmental water control structures
- Lock complex - lock in the Houma Navigation Canal measuring 110-ft wide by 800-ft long, an adjoining floodgate measuring 250 feet wide, and a dam closure.

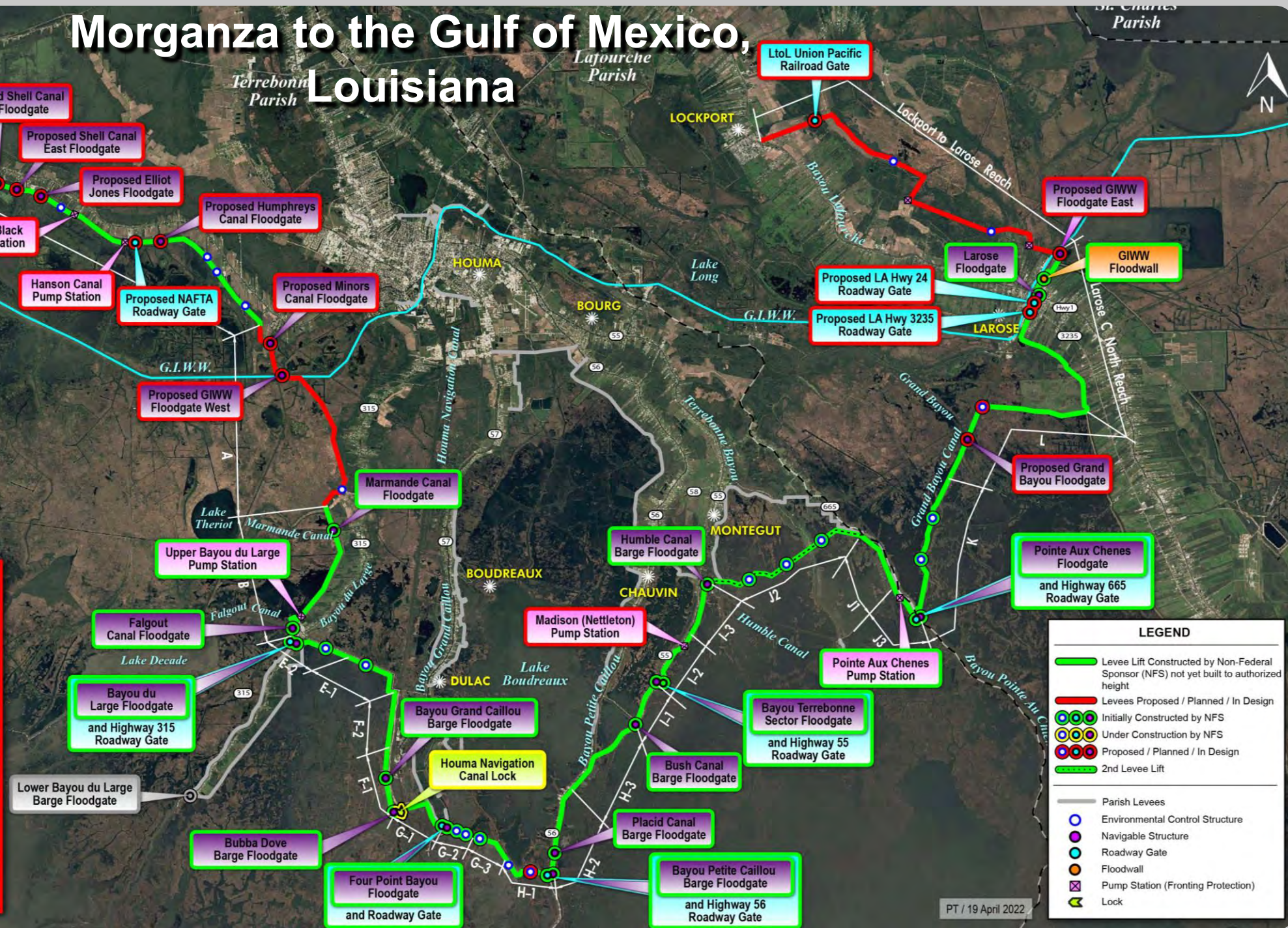




AUTHORIZED PACR ALIGNMENT



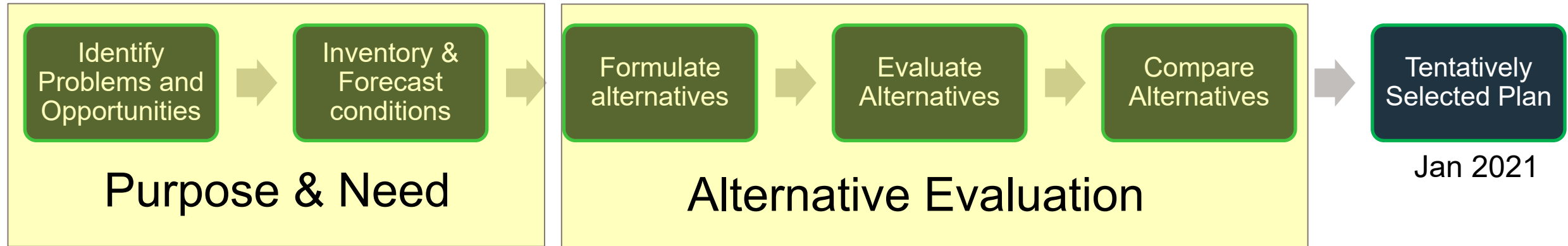
Morganza to the Gulf of Mexico, Louisiana





EVALUATION PROCESS

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- ✓ Define the problem
- ✓ Inventory available data and information
- ✓ Forecast of future conditions
- ✓ Identification of key areas of uncertainty that will impact the project formulation
- ✓ Identification of the decision criteria that will be used to formulate, compare and select alternatives
- ✓ Formulation of alternatives based on critical thinking and professional expertise





PURPOSE AND NEED



- PURPOSE - Reduce the risk of damage caused by hurricane storm surges.
- NEED -





EXISTING CONDITIONS

Federal funds have been appropriated for design and construction

Reach A – Programmatic EA with Constructible Features
Humble Canal – Preload EA

The non-Federal sponsor is using state and local funds to independently construct interim features in advance of the Federal project.



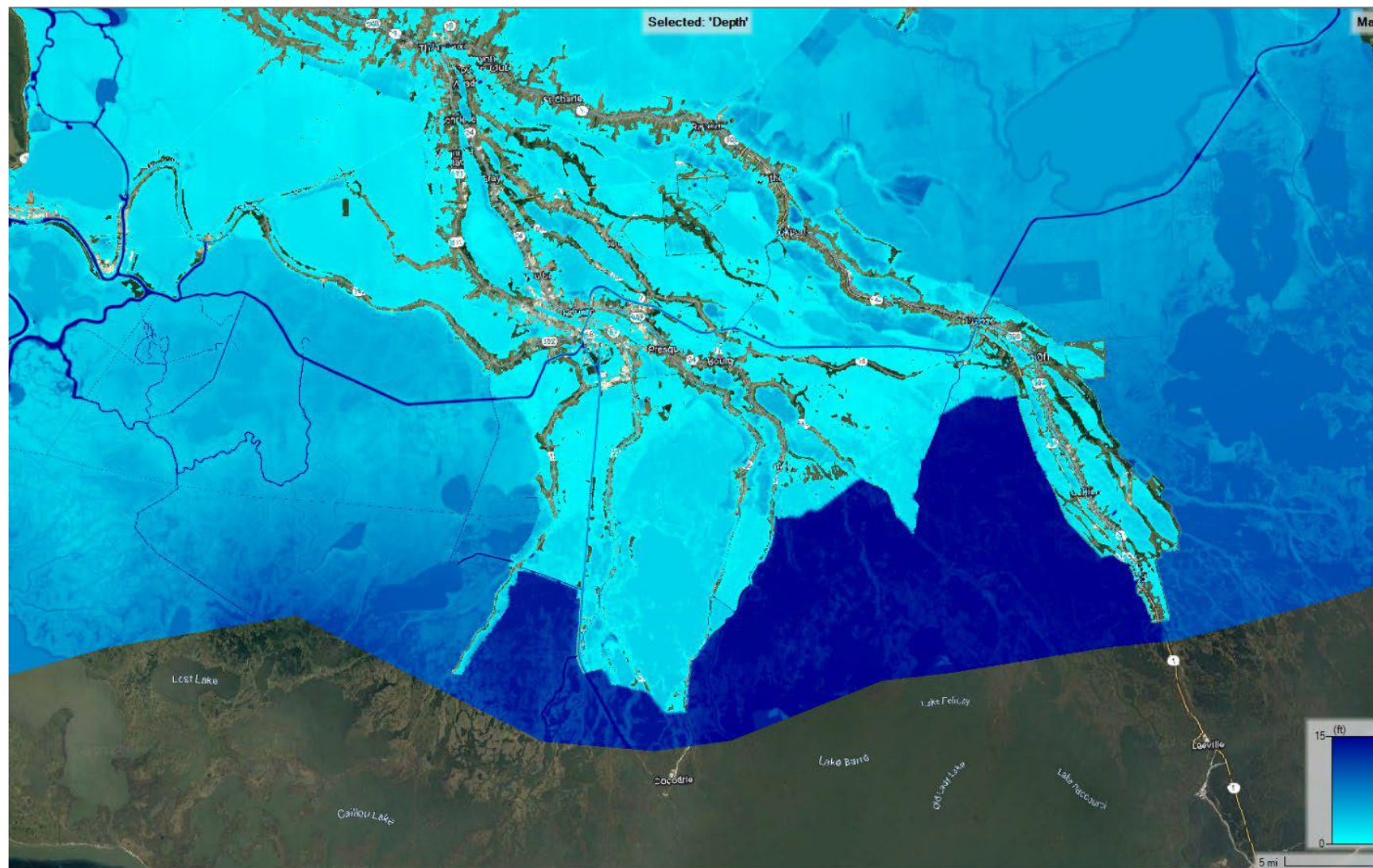


1% AEP Event, Existing Conditions, Precipitation and Storm Surge, 2035





TERREBONNE AND LAFOURCHE FLOODING

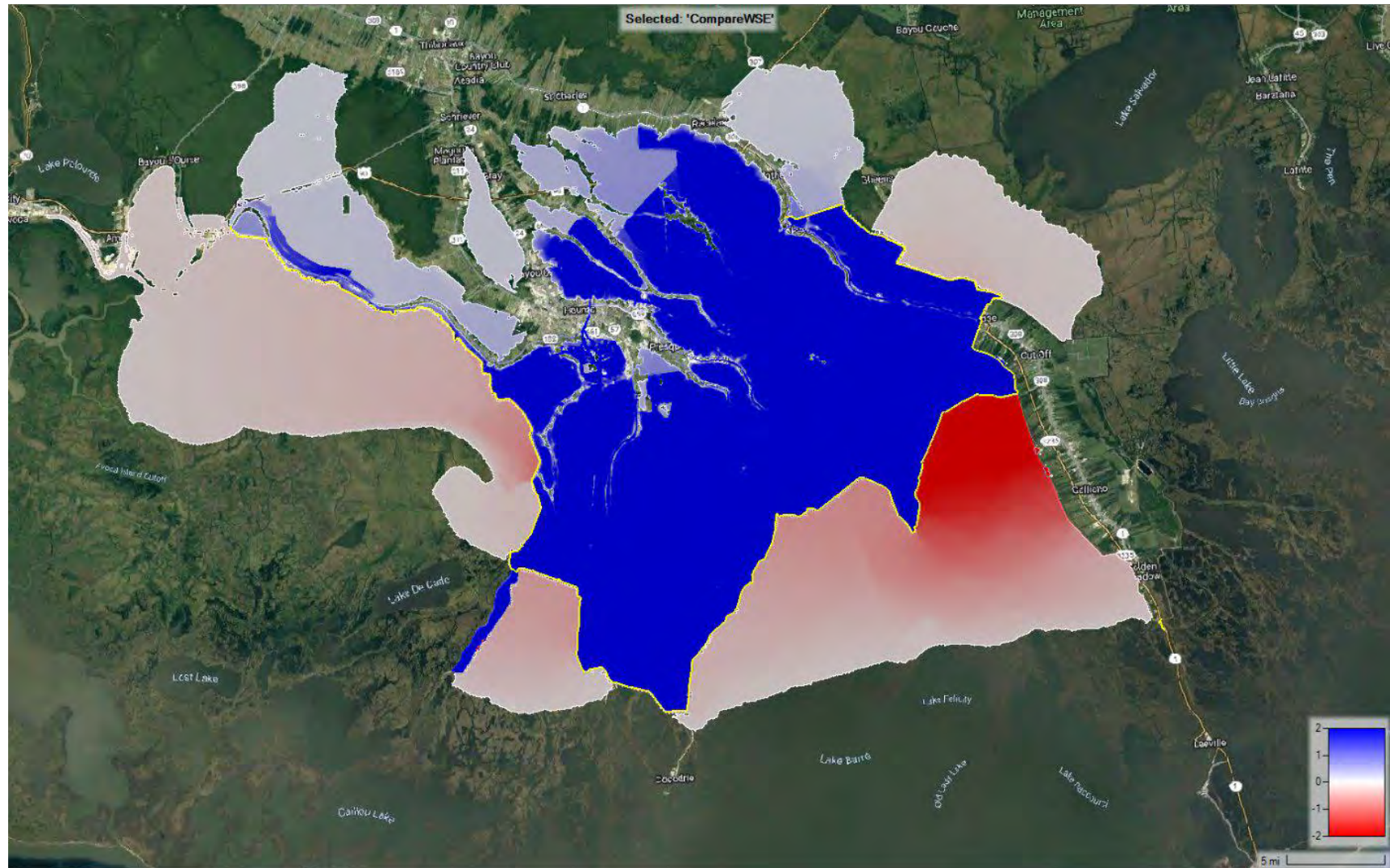


*1% AEP Event, Proposed Conditions, Precipitation and
Storm Surge, 2035*





TERREBONNE AND LAFOURCHE FLOODING



*Difference Grid - 1% AEP Event, Existing Minus Proposed Conditions,
Precipitation and Storm Surge, 2035*

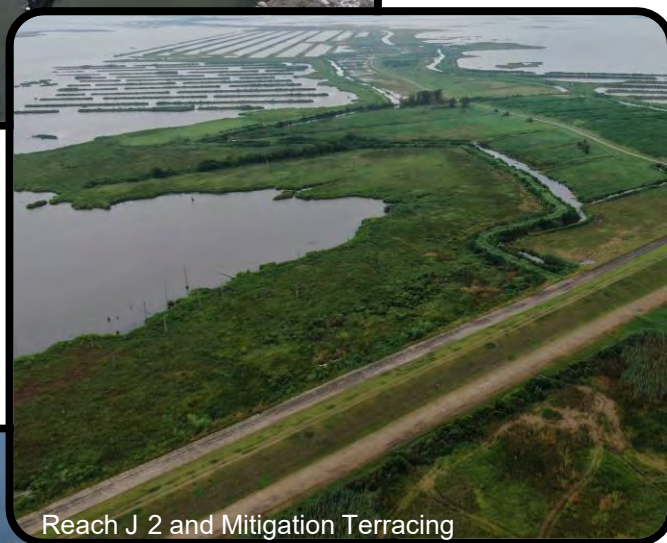


NON-FEDERAL SPONSOR EFFORT

- Invested over \$1.1B along MTG alignment
 - 80+ miles of levee constructed
 - 25+ structures
 - Houma Navigation Canal Lock Complex
 - Ongoing levee lifts
- Collaborating on current designs
- Benefits demonstrated 99% residential flooding reduction between 2005 (Hurricane Rita) and 2019 (Hurricane Barry) but still vulnerable to greater storms



Petite Caillou Floodgate and Road Gate 2016



Reach J 2 and Mitigation Terracing



Conceptual Design for the Houma Navigation Canal Lock Complex



MORGANZA TO THE GULF LEVEE SYSTEM

23



Federal Funding: \$469.31M Appropriated

FY 2021 New Start--\$12.46M

- Humble Canal Preload & PED
\$12.46M

FY 2022 Bipartisan Infrastructure Law-- \$378.52M (Design & Construction)

- Reach A Levee portion \$24.93
- Lockport to Larose Levee portion
\$30M
- Minors Canal Floodgate \$29.5
- GIWW West Floodgate \$125.25
- GIWW East Floodgate \$113.6
- Humble Canal Floodgate \$52.25

FY 2022 Community Fund (Earmark)-\$19.33M

- Reach F Design
- Reach J-2 Design
- Shell Canal Floodgate Design

FY 2023 Community Fund (Earmark)-\$31M

- Reach L Design \$11.5M
- Reach K Design \$11.5M
- Bayou Terrebonne Floodgate Design
\$8M

FY 2024 Community Fund (Earmark)-\$28M

- Reach A Levee Const. (Contract 1)
- Reach A Structures Design
- Environmental Coord. (Mitigation)





MORGANZA TO THE GULF LEVEE SYSTEM

FEDERAL WORK UNDERWAY

24



Funded Design and Construction

Features Funded for Design and Construction

Levee Features

- Reach A Levee portion-\$27M
- Lockport to Larose Levee portion-\$30M

Structure Features

- Minors Canal Floodgate-\$30M
- GIWW West Floodgate-\$125M
- GIWW East Floodgate-\$114M
- Humble Canal Floodgate-\$52M

Features Funded for Design — \$52M

Levee Features

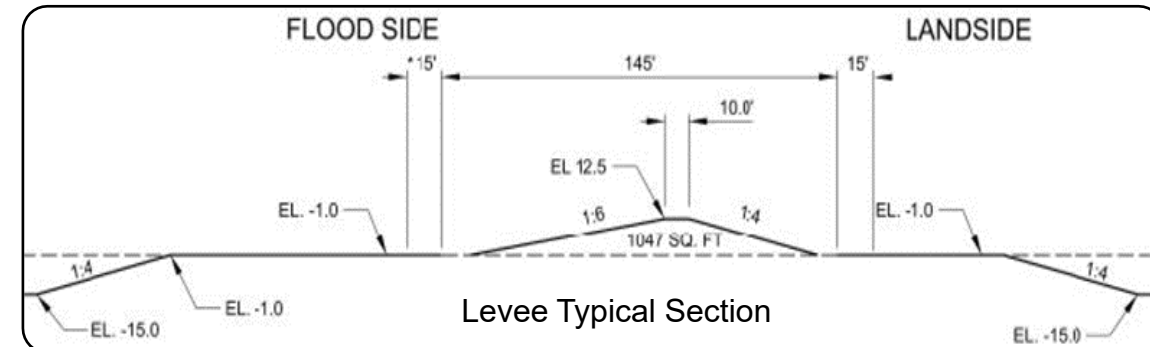
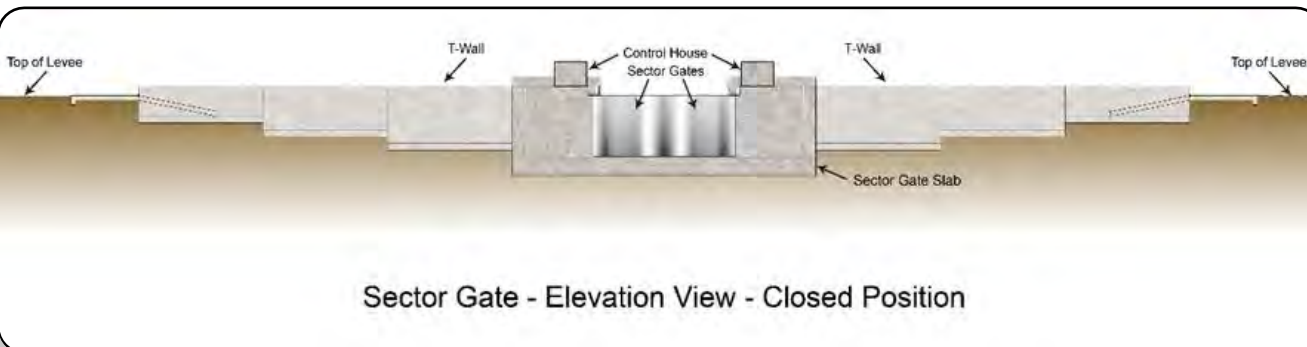
- Reach F
- Reach J-2
- Reach L
- Reach K

Structure Features

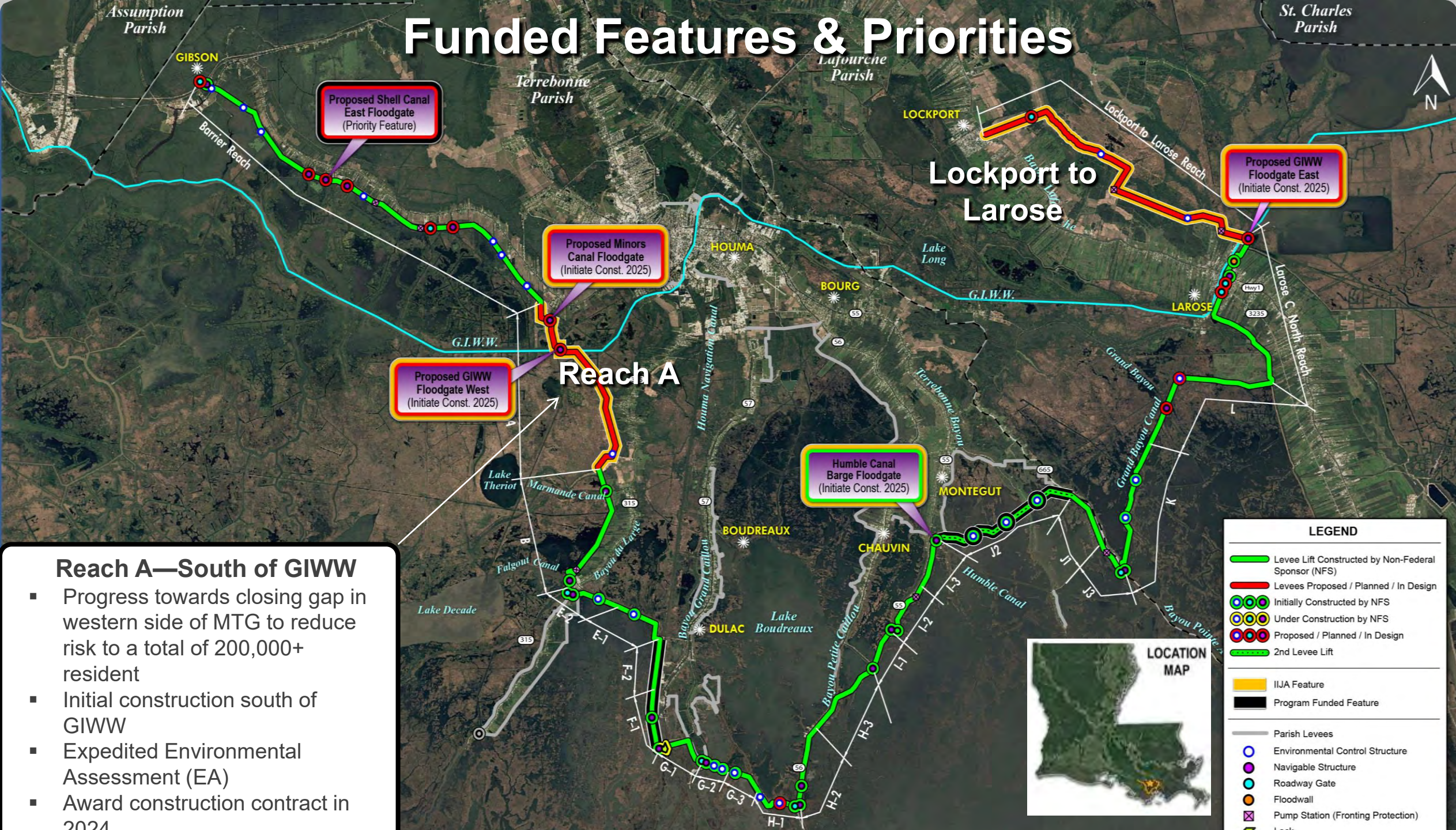
- Bayou Terrebonne Floodgate
- Shell Canal Floodgate

Environmental Efforts

- Reach A Environmental Assessment (EA) & Mitigation
- Reach F EA
- Supplemental Environmental Impact Statement (SEIS)—Entire project
- Survey and Borings EA



Funded Features & Priorities



Reach A—South of GIWW

- Progress towards closing gap in western side of MTG to reduce risk to a total of 200,000+ resident
- Initial construction south of GIWW
- Expedited Environmental Assessment (EA)
- Award construction contract in 2024



MORGANZA TO THE GULF LEVEE SYSTEM

FEDERAL WORK UNDERWAY

26



Federal Funding: \$469.31M Appropriated

Project Mission: Working with CPRA and Levee Districts to deliver a world class levee system design to combat a 100-year storm for the citizens of Terrebonne and Lafourche Parishes

Construction Started

- Humble Canal Sector Gate Preload-Complete September 2023--\$11M
- Reach A Contract 1- to advertise in May 2024--\$28M





WITHOUT PROJECT CONDITION

Most likely condition of the resources and human environment if no additional actions are taken

Flood risk

- Continued sea level rise
- Continued subsidence

Increased storm damages

- Frequency
- Intensity

Local Sponsor Construction Projects





ALTERNATIVES



No Action Alternative

Authorized Post Authorization Change Alternative

Non-Federal Sponsor Alignment

Modified PACR alignment





SCREENING CRITERIA

- Meets Project objectives
- Meets USACE definition for flood risk management vs local storm drainage- ER-1165-2-21 (greater than 800 cfs)
- Reduces flood risk in a repetitive loss/problem drainage
- Potential Damages Avoided Exceed Implementation C
- Consistent with the CPRA Master Plan
- Avoids Project constraints
 - Impacts to threatened and endangered species and their critical habitats
 - Impacts to managed habitats i.e. essential fish habitat (EFH)
 - Lands known to have Hazardous, Toxic and Radioactive Waste (HTRW) concerns
 - Impacts to established recreational areas
 - Impacts to view shed



ENVIRONMENTAL OPPORTUNITIES



- Provides resiliency to combat sea level rise
 - Design includes projected sea-level rise through 2085
- Design considers increasing tropical cyclone frequency and strength
- Environmental control structures allow tidal exchange while protecting vulnerable wetlands
- Marsh recovery and preservation
- Exploring creative mitigation opportunities
 - Addressing salinity increases through operational changes
 - Adaptive management



Environmental Control Structure



Reach F Mitigation 2012



Reach F Mitigation 2019

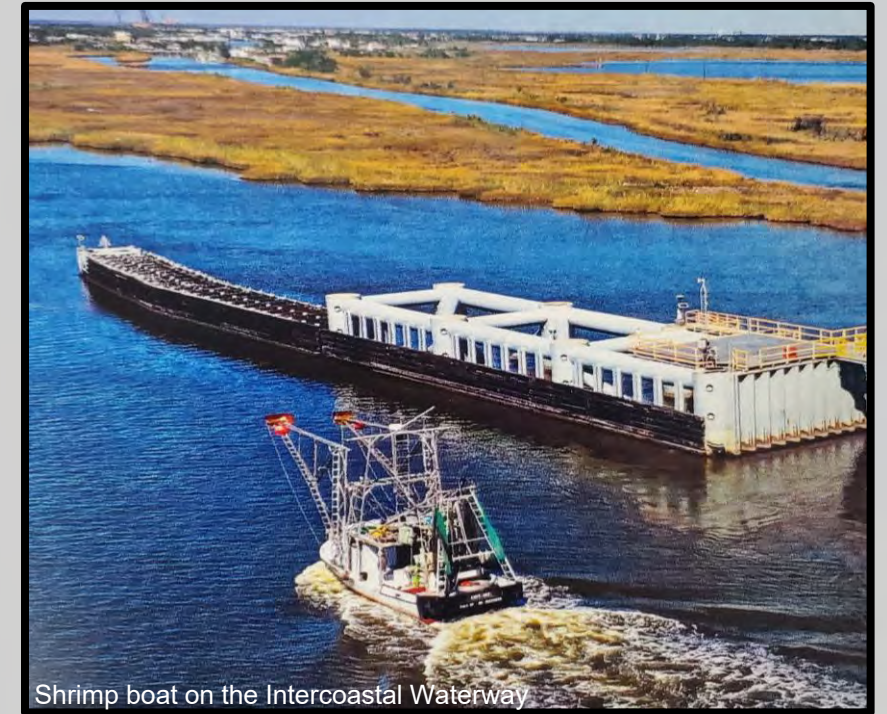


Reach F Mitigation 2022



ENVIRONMENTAL JUSTICE

- Protecting disadvantaged communities and low-moderate income populations
 - Of the 200,000+ residents in the Terrebonne and Lafourche Parishes, 86,393 live in disadvantaged census tracts
 - 24% minority population
 - 20% of residents live in poverty
- Sustaining Louisiana's fisheries and culture
- Sustaining emerging offshore wind energy development
- Anticipate alignment with Justice40 Initiative



Shrimp boat on the Intercoastal Waterway



ENVIRONMENTAL JUSTICE

JUSTICE40

A WHOLE-OF-GOVERNMENT INITIATIVE



OUT-YEAR PRIORITIES/ PATH FORWARD

- Fiscal Year 2025 \$93M:
 - Reach F Levee Lift Construction
 - Continue Critical Structure Designs
 - Environmental Coordination (Mitigation)
- Fiscal Year 2026 \$TBD:
 - Reach J-2 Levee Lift Construction
 - Environmental Coordination (Mitigation)
- Complete SEIS (ROD) in March 2026
- Stay poised to execute Regular (Earmarks, Work Plan, PBUD) funds each FY
- \$~380M per year: Funding requirement to attain project benefits by 2035





INPUT WE NEED FROM YOU



1. Do the alternatives meet the needs of the community?
2. Are there additional problems related to flooding in the project area that are not captured? Or not addressed by the proposed alternatives?
3. With what storm did your community see the most damages? How often are you seeing flooding?
4. Are there measures or alternative strategies that would address the problems more effectively?



TO SUBMIT COMMENTS

Comments accepted through August 26, 2024

Email: mvnenvironmental@usace.army.mil

Address:

Eric Williams, CEMVN-PDS
7400 Leake Ave.
New Orleans, LA 70118

Text or Voicemail:

504-862- 2862

Project Website:

<https://www.mvn.usace.army.mil/About/Projects/Morganza-to-the-Gulf/>



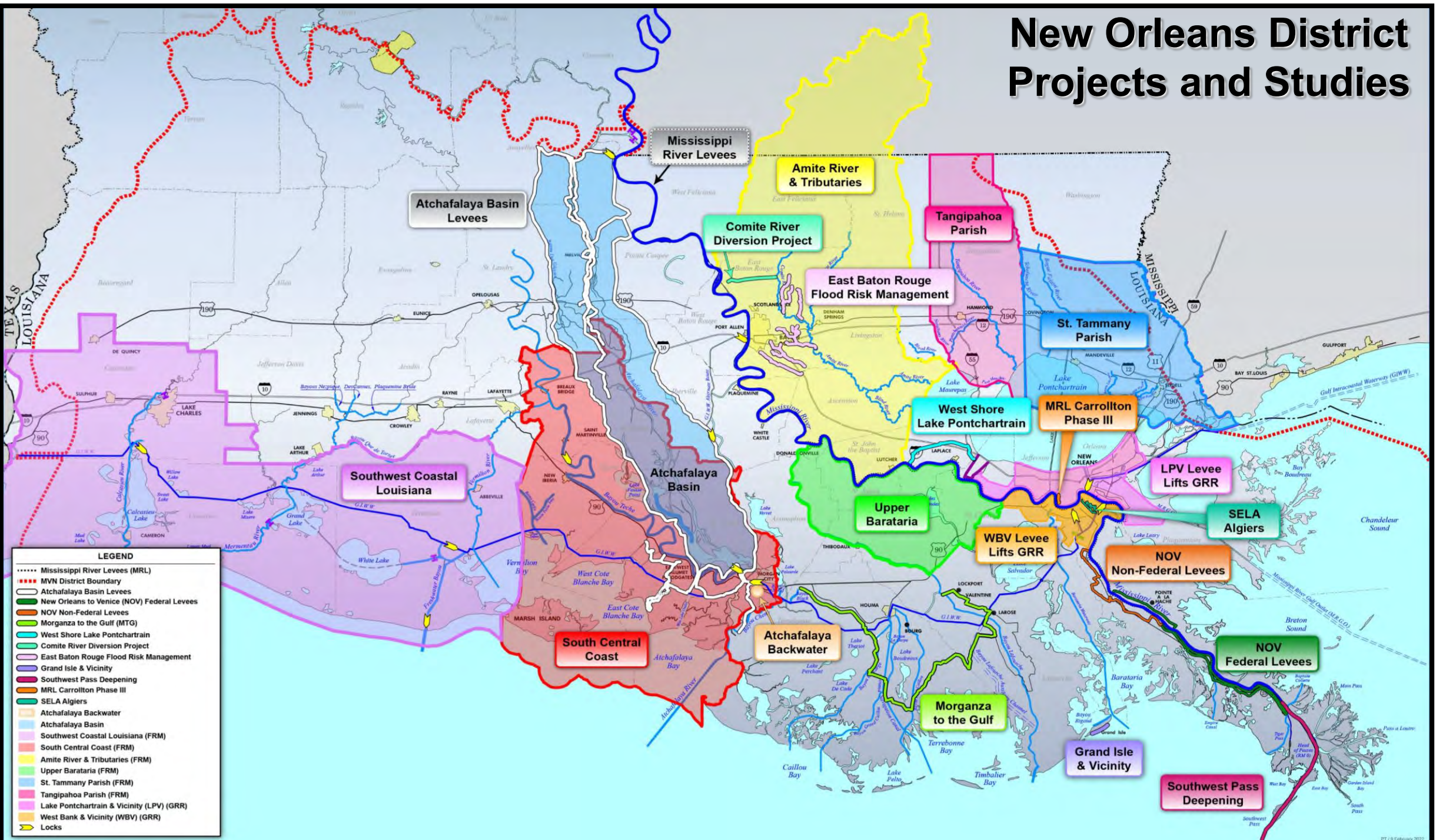
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THANK YOU FOR JOINING US

New Orleans District Projects and Studies





U.S. Army Corps
of Engineers
New Orleans District

ATTENDANCE RECORD

Date: 5 August 2024

Morganza To The Gulf Public Scoping Meeting

Barry P. Bonvillian Civic Center

PLEASE PRINT CLEARLY

Name	Home Address or Organization	City	State	Zip	Email	Phone
1. Rev. C. Kirby Venet	183 East Grand Rd.	Jurac	La	70353	ckirbyvenet@gmail.com	(985) 856-5037
2. Cecile Carter	217 Thoroughbred	Thibodaux	LA	70301	Campes@gmail.com	985/914-9332
3. Charles Roberts	100 Coen Drive	Thibodaux	LA	70301	Charles@onsmoreco.com	855-387-2479
4. Blake Compard	604 Lory 13th St	Louisiana	LA	70373	blakecompard-sons.com	
5. DANIEL DEARMOND	CPRRA	THIBODAUX	LA		DANIEL.DEARMOND@LA.gov	985-688-0259
6. Paul Bonvillian	MAC	Thibodaux	LA	70301	Mend.bonvillian@micholls.edu	985 258 1399
7. Chris St Martin	Wheeler Station	Forest	LA	70301	CSmartin@STWBA.com	985 826 3091
8. Lizbeth St Martin	111					
9. Michael St. Martin	Shue	Shue				Shue
10. Mike Strubs	450 Monrovia Dr	Houma			mike.strubs@unitedhumanitarian.org	709-2144
11. Rosario Pyne		Bayou	LA		rdpyne@tcd.org	985-790-5902
12. Miguel Hidalgo	TLED	Houma	LA	70363	ahidalgo@tled.org	985 209 6341
13. Terry Middleton	TLED	Thibodaux	LA	70301	tmiddleton@tled.org	985-209-6346
14. Paige Lisslar	CTAC	Thibodaux	LA	70301	paige@louisianactac.org	985-493-2583
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US Army Corps
of Engineers
New Orleans District

ATTENDANCE RECORD

Date: 5 August 2024

Morganza To The Gulf Public Scoping Meeting

Barry P. Bonvillian Civic Center

PLEASE PRINT CLEARLY

Name	Home Address or Organization	City	State	Zip	Email	Phone
1 W. Alex Rstheimer	1010451st Ave	Hammond	La	70413	rstheimer1010@comcast.net	985-791-1379
2 Mtn Marina nls	351 Tinsley Dr	Hammond	La	70404	mtmna1010@comcast.net	985-655-7100
3 Debbie Oates	3924/3805A	Hammond	La	70404	dbbie.oates@la.gov	
4 Stephen Smith	All South	Hammond	La	70404	smith@casell.com	504-382-2783
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US Army Corps
of Engineers
New Orleans District

ATTENDANCE RECORD

Date: 5 August 2024

Morganza To The Gulf Public Scoping Meeting

Barry P. Bonvillian Civic Center

PLEASE PRINT CLEARLY

Name	Home Address or Organization	City	State	Zip	Email	Phone
1 Jesse Billiot	600 Beatrice Street	Houma	LA	70363	jesse.billiot@hotmail.com	985-688-7592
2 Bridget Malbrough	Coastal Technical Assistance	Thibodaux	LA		bridget@louisianacra.org	985-860-4103
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US Army Corps
of Engineers
New Orleans District

ATTENDANCE RECORD

Date: 1 August 2024

Morganza To The Gulf Public Scoping Meeting

Location: Montegut Fire Station

PLEASE PRINT CLEARLY

Name

Home Address or Organization

City

State

Zip

Email

Phone

Lance Fossell

United Horse Noddy

Barrow

LA

2860

Lance.Fossell@UnitedHorseNoddy.com

905-772-3889

Part 3: Scoping Comments

- 3.1 Pointe Au Chien Tribe
- 3.2 Former United Houma National Tribal
- 3.3 Chairman Taproot Earth
- 3.4 U.S. Fish and Wildlife Service
- 3.5 U.S. Environmental Protection Agency



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New Orleans District

The purpose of the general scoping meeting is to inform the public about the proposed studies, and to open the dialog with interested parties to define existing problems, needs, and opportunities.

Comment Card

Comments: Currently, large pits are being dug to farm material
for the levee systems. Some of these pits are in area where land is
already scarce. What is the plan to refill these pits?

Name Jesse Billist

Affiliation Pointe Au Chien Tribe

Street 610 Beatrice Street

Phone 985-688-7892

City, St Zip Houma, LA 70363

E-mail jesse_billist@hotmail.com



US Army Corps
of Engineers
New Orleans District

The purpose of the general scoping meeting is to inform the public about the proposed studies, and to open the dialog with interested parties to define existing problems, needs, and opportunities.

Comment Card

Comments: "Our nation needs God, indivisible, with liberty and justice for All. We need to protect our environment, people and property, we live in a very special place where people work hard to make a living. We do not need delays but to continue to move forward on this project. Our levee district took action to move Monrovia forward. Our citizens taxed themselves to fund this project and match money. We had to fight to be included and we know if you do not protect, every one loses."

Name Rev. C Kirby Venet Coamen United House Nation Tribal Chairman
Street 183 Coast Guard Rd Affiliation
City, St Zip Dulac, La 70353 Phone (985) 856-5037
E-mail ckirbyvenet@icloud.com
Pastor of Clanton Chapel UMC, Dulac, La.



August 26, 2024

U.S. Army Corps of Engineers
New Orleans District, Attn: CEMVN-PDC-C
7400 Leake Avenue
New Orleans, LA 70118
Via email: mvnenvironmental@usace.army.mil

Re: NEPA Scoping Comments for the Morganza to the Gulf of Mexico (MTG)

Taproot Earth appreciates the opportunity to submit comments during the National Environmental Policy Act (NEPA) Scoping Comment Period for the Morganza to the Gulf of Mexico (MTG) levee project. As a global climate justice organization based in Slidell, Louisiana, Taproot Earth works with communities across 18 states from the Gulf South up through Appalachia and across the globe to advance solutions that involve pertinent resources such as water, energy, and land to ensure that we can address climate change in a holistic way. Taproots foundations evolved out of the aftermath of Hurricane Katrina in 2005, a climate disaster that killed thousands of people, displaced hundreds of thousands and changed the Gulf South region forever. Taproot understands the role of and conversations around levees to be directly impacted by a changing climate reality-one that promises to impact water resources, land subsidence and undervalued communities.

The MTG a levee project impacts hundreds of long-standing Black communities in South Louisiana and five state-recognized tribes: Bayou Lafourche; Grand Caillou/Dulac; Isle de Jean Charles; Pointe-au-Chien; and the United Houma Nation. The land of many of these Peoples were included in the MTG's original project design only to be excluded due to a lack of economic feasibility to protect them. Similar arbitrary decisions supported by partial zoning policies rooted in structural discrimination (laws, policies, accepted traditions) have created a reality where poor, Black and Indigenous communities now live in low lying, flood prone areas.¹

¹ Overrepresentation of Historically Underserved and Socially Vulnerable Communities Behind Levees in the United States <https://agupubs.onlinelibrary.wiley.com/doi/full/10.1029/2023EF003619>.

Taproot Earth appreciates the agency's work to change the originally proposed MTG levee and make improvements to the existing portions of the Morganza to the Gulf levee to be more inclusive of poor and Indigenous communities. As part of the scoping process, the USACE has a chance to consider various alternatives and impacts in the project area. With a proper assessment of a discriminatory past (that has brought us to an unprecedented climate future), current updated data and policies, impacts of sea level rise² and Federal environmental justice mandates,³ USACE can chart a new path forward.

While levees can help to protect communities from severe storms and flooding, they also pose major challenges. Healthy wetlands are needed to help manage storm surges. The construction of levees obstruct natural waterways, decreasing the flow of sediment and destroying wildlife habitats, including wetlands lost at an accelerated pace in Louisiana due to the fossil fuel industry. Levees also pose a risk to the long-term health of the ecosystem since they are known to degrade soil health.

As the MTG levee project undergoes another scoping period and supplemental environmental impact statement, below are Taproot Earth's recommendations and considerations for the USACE, as well as answer some of the requested questions asked by the USACE. Below, please find our Recommendations:

1. Indigenous Peoples and Tribal Communities Outreach, Free Prior and Informed Consent and Right of First Refusal

Measures should be taken to ensure that Indigenous communities and Tribes have ample opportunity to learn about the proposed changes, ask questions and provide insights of impacts to the community. Taproot Earth recommends that the agency obtains the free prior and informed consent⁴ of all impacted Indigenous communities in the MTG project scope. We believe that this internationally recognized standard is the best way to respect Indigenous rights.

Impacted tribal nations and Peoples should have the right of first refusal for any proposed changes that will significantly impact their communities in order to ensure the tribes' sovereignty. If a project is supported by a tribe, deeper consultation can look like, but is not limited to, hiring local tribal members as consultants for project development and habitat

² Sea Level Rise and Implications for Low Lying Islands, Coasts and Communities

<https://www.ipcc.ch/srocc/chapter/chapter-4-sea-level-rise-and-implications-for-low-lying-islands-coasts-and-communities/>.

³ Executive Order 12898, Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations

<https://www.federalregister.gov/documents/1994/02/16/94-3685/federal-actions-to-address-environmental-justice-in-minority-populations-and-low-income-populations>; Executive Order 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All <https://www.govinfo.gov/content/pkg/FR-2023-04-26/pdf/2023-08955.pdf>.

⁴ United Nations Human Rights Office of the Commissioner, Free Prior and Informed Consent of Indigenous Peoples, <https://www.ohchr.org/sites/default/files/Documents/Issues/IPeoples/FreePriorandInformedConsent.pdf>.

restoration. In the interest of ensuring an inclusive and democratic process in public meetings, basic accommodations for robust participation should be provided at no cost to the participants, including providing food, childcare and financial or transportation support for those traveling from impacted areas far away.

2. Prioritize Habitat Restoration of the Natural Infrastructure

Taproot Earth recommends that the USACE prioritize natural infrastructure such as habitat restoration in constructing the MTG. This includes the restoration of 427 acres of intermediate marsh, 358 acres of brackish marsh and 975 acres of saline marsh. Proper restoration of the marsh land is likely to decrease land loss. Communities across this region have been in deep relationship with the marsh lands for generations. Having deep consultation and collaboration with the tribes and long-standing communities of the impacted area, can support in building out a longstanding habitat restoration program. Habitat restoration is worth the price, because the loss of wildlife directly impacts the health and wellbeing of communities. Additionally, any compensatory mitigation should be done in-kind and in-basin in order to preserve the integrity of the ecosystem.

3. Democratize Public Research on the impacts of the current flood mitigation systems

Additionally, the USACE should consider that the Mississippi River Delta and coastal Louisiana are losing a football field of wetlands every 100 minutes⁵ and the impacts of the MTG on land loss is not directly mentioned in the project and proposed alternatives. Levees are known to increase land loss, so an analysis of the different project alternatives and their impacts on land loss should be included in the Supplemental Environmental Impact Statement (SEIS).

Flood gates are currently in place in communities to protect against severe flooding and surges. However, the opening and closing of flood gates is currently at the discretion of local agencies and operators. Community residents in Dulac have reported incidents when the floodgates have stayed open during flooding events in order to allow for canal navigation for marine traffic. The USACE should investigate and provide recommendations on how the opening and closing of flood gates will prioritize protecting local communities from flooding, and to set forth mechanisms for transparency and accountability in flood gate management.

Current information does not directly relay the failures of the current levee system in protecting communities from severe flooding like that of Hurricane Ida. There are deficiencies in data showing how this proposed levee system protects against a storm like Hurricane Ida. Taproot Earth requests that the SEIS detail protection under Hurricane Ida conditions (1) with current storm protection infrastructure (no action alternative); (2) with proposed alternative (MTG levee); and (3) with native habitat restoration alternative.

⁵ Land Loss in the Mississippi River Delta: <https://mississippiriverdelta.org/our-coastal-crisis/land-loss/>.

Storms are intensifying, and sea level is rising. Communities in coastal Louisiana find themselves in extremely challenging situations with loss of lives, homes, and culture. In thinking about how to protect the most vulnerable of communities, the USACE should listen to the needs, input, and wisdom of those that have been in relationship with the land for generations.

Thank you for the opportunity to provide these comments.

Faye Matthews, Esq. and Naadiya Hutchinson for Taproot Earth



United States Department of the Interior

FISH AND WILDLIFE SERVICE
200 Dulles Drive
Lafayette, Louisiana 70506



July 22, 2024

Ms. Sandra Stiles
U.S. Army Corps of Engineers
New Orleans District
Attn: CEMVN-PDS
7400 Leake Avenue
New Orleans, Louisiana 70118

Dear Ms. Stiles:

Please reference the June 20, 2024, Federal Register “Notice of Intent to Prepare a Supplemental Environmental Impact Statement (SEIS) to the Revised Programmatic Environmental Impact Statement (RPEIS) for the Morganza to the Gulf of Mexico, Louisiana, Hurricane and Storm Damage Risk Reduction Project (MTG)” (Notice). In the Notice, the U.S. Army Corps of Engineers (USACE), Mississippi Valley Division, New Orleans District asked for the Fish and Wildlife Service’s (Service) comment and participation in the coordinated environmental review process for the SEIS to evaluate design changes to the authorized MTG project to meet the one percent Annual Exceedance Probability (AEP) Storm Surge Risk Reduction (100-year level of risk reduction (LORR)). The SEIS supplements the RPEIS, MTG, Louisiana, that was integrated with the 2013 Final Post Authorization Change Report (PACR). The Service accepts your invitation to participate as a cooperating agency for this effort.

According to the Notice, the MTG hurricane and storm damage reduction project is an approximately 98-mile levee system located mostly in Terrebonne and part of Lafourche Parishes, Louisiana, intended to reduce the risk of damage due to hurricane storm surges in the area. The MTG project was initially authorized by the Water Resources Development Act of 2007. The project was redesigned in the 2013 Integrated RPEIS and PACR Report to address cost increases and to meet updated post-Hurricane Katrina design guidelines. The SEIS will analyze the expected environmental impacts including indirect and cumulative effects for the final array of levee alignments and other features such as floodgates, etc.

The following comments are provided as an early planning aid in accordance with provisions of the Fish and Wildlife Coordination Act (FWCA) (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act of 1969 (NEPA) (83 Stat. 852, as amended; 42 U.S.C. 4321 et seq.), and the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended; 16 U.S.C. 661 et seq.).

Significant Fish and Wildlife Resources to Be Considered

Threatened and Endangered Species and Other Species of Concern

The proposed study is located in an area where federal trust resources such as threatened and endangered species, at-risk species, nesting wading birds, and bald eagles occur. According to the Notice, the USACE will consult with the Service regarding potential project impacts to threatened and endangered species and any designated critical habitat. The USACE should obtain a list of threatened and endangered species that may occur in the proposed project location from our Information for Planning and Consultation ([IPaC](#)) online tool. The USACE should then make determinations about effects to those species using IPaC.

Section 7(a)(1) opportunities

[Section 7\(a\)\(1\) of the ESA](#) is a conservation mandate that states, “All... Federal agencies shall ... utilize their authorities in furtherance of the purposes of this Act by carrying out programs for the conservation of endangered species and threatened species.” It is a proactive authority with a goal to recover listed species. The Service recommends throughout the study process that consideration be given to the recovery of listed and proposed species. For examples and ideas of conservation measures refer to the USACE’s 2014 [Conservation Plan for the Interior Least Tern, Pallid Sturgeon, and Fat Pocketbook Mussel in the Lower Mississippi River](#) which was developed to help comply with Sect 7(a)(1) for those species.

At-Risk Species Opportunities

The Service’s Southeast Region has defined “at-risk species” as those that are: 1) proposed for listing under the ESA by the Service; 2) candidates for listing under the ESA, which means the species has a “warranted but precluded 12-month finding”; or 3) petitioned for listing under the ESA, which means a citizen or group has requested that the Service add them to the list of protected species. Petitioned species include those for which the Service has made a substantial 90-day finding as well as those that are under review for a 90-day finding. As the Service develops proactive conservation strategies with partners for at-risk species, the states’ Species of Greatest Conservation Need (defined as species with low or declining populations) will also be considered. Opportunities to consider for reducing the likelihood of additional species listings would be actions that benefit at-risk species. Please see [At Risk Species](#) or contact the Service’s Louisiana Ecological Services Office for further information on each species.

Opportunities for Birds of Conservation Concern

The 1988 amendment to the FWCA mandates the Service to identify species, subspecies, and populations (hereafter taxa) of all migratory nongame birds that without additional conservation action are likely to become candidates for listing under the ESA. The Birds of Conservation Concern 2021 ([BCC 2021](#)) is the most recent effort to carry out this mandate. The Service’s goal is to work with private and public entities on proactive conservation to conserve these species, thereby precluding the need to federally list as many at-risk species as possible. Please use the link above to find several Birds of Conservation Concern known to occur within the study area.

Significant Habitats

Coastal marshes, swamp, bottomland hardwood forest ([BLH] wet and dry), riparian zone, stream water bottoms, and other habitats are considered by the Service to be resources of national

importance due to their increasing scarcity and high habitat value for fish and wildlife within Federal trusteeship (i.e., migratory waterfowl, wading birds, other migratory birds, threatened and endangered species, at-risk species, and interjurisdictional fisheries).

The Service's Mitigation Policy (Federal Register, Volume 46, No. 15, January 23, 1981) identifies four resource categories that are used to ensure that the level of mitigation recommended by Service biologists will be consistent with the fish and wildlife resource values involved.

Resource Category 1 - Habitat to be impacted is of high value for evaluation species and is unique and irreplaceable on a national basis or in the ecoregion section. The mitigation goal for this Resource Category is that there should be no loss of existing habitat value.

Resource Category 2 - Habitat to be impacted is of high value for evaluation species and is relatively scarce or becoming scarce on a national basis or in the ecoregion section. The mitigation goal for habitat placed in this category is that there should be no net loss of in-kind habitat value.

Resource Category 3 - Habitat to be impacted is of high to medium value for evaluation species and is relatively abundant on a national basis. FWS's mitigation goal here is that there be no net loss of habitat value while minimizing loss of in-kind habitat value.

Resource Category 4 - Habitat to be impacted is of medium to low value for evaluation species. The mitigation goal is to minimize loss of habitat value.

The Service recommends the USACE investigate alternatives which avoid and minimize impacts to these habitats and where possible to enhance or restore them. If the below habitats cannot be avoided, mitigation will be recommended. Considering the high value of these wetlands for fish and wildlife and the relative scarcity of those habitat types, those habitat types are designated as Resource Category 2, the mitigation goal for which is no net loss of in-kind habitat value.

Coastal Marshes

Louisiana supports the largest area of coastal marsh in North America (Coleman and Huh 2004; Couvillion et al. 2017). Marsh types in the study area include fresh, intermediate, and brackish (Enwright et al. 2014). Coastal marshes exhibit an increasing salinity gradient beginning with freshwater wetlands in the uppermost basins and near existing breaches along the bank of the Mississippi River, which transition into intermediate marsh, followed by brackish habitats, and then saline marshes towards the Gulf of Mexico. The marshes and waters of coastal Louisiana are high in biological productivity (Day et al. 1982). They serve as vital nursery areas for fish and shellfish (Van Sickle et al. 1976) as well as wildlife habitat (Lowery 1974a, 1974b). Some of the waterways and marshes in the area are identified as Essential Fish Habitat by the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act; P.L. 104-297). Those wetlands provide plant detritus to adjacent coastal waters and thereby contribute to the production of commercially and recreationally important fishes and shellfishes. Wetlands also provide valuable water quality functions such as reduction of excessive dissolved nutrient levels, filtering of waterborne contaminants, and removal of suspended sediment. In addition, coastal wetlands buffer storm surges and reduce their damaging effect to man-made infrastructure within the coastal area.

Forested Wetlands (Swamp and Bottomland Hardwood Forest)

Forested wetlands (BLH and swamp) are found along the natural levees of the Mississippi River and its tributary ridges throughout the floodplain. Swamp habitat in the study area consists primarily of cypress, tupelo, and red maple. The BLH habitat consists of species such as oaks, hickories, American elm, green ash, sweetgum, sugarberry, boxelder, persimmon, honey locust, red mulberry, eastern cottonwood, and American sycamore. Swamp and BLH are valuable plant communities that provide a variety of significant benefits to wildlife including food, nesting areas, shelter, and water.

National Wildlife Refuges

The Service administers the Mandalay National Wildlife Refuge (NWR) located adjacent to the study area along the Gulf Intracoastal Waterway. The Service recommends the USACE consider in their planning that NWR and any other lands with conservation mandates, such as State of Louisiana Wildlife Management Areas, that may potentially be impacted by the proposed project. The USACE should coordinate with the Refuge Project Leader (Pon Dixon, pon_dixon@fws.gov) for any potential impacts to Mandalay NWR.

The USACE and the Service have formally committed to work together to conserve, protect, and restore fish and wildlife resources while ensuring environmental sustainability of our Nation's water resources under the January 22, 2003, Partnership Agreement for Water Resources and Fish and Wildlife. Accordingly, the Service looks forward to our continued work on the MTG SEIS. Comments and responses to this early planning aid letter can be directed to the Service's Louisiana Ecological Services Office. We appreciate the cooperation of your staff on the MTG SEIS. Should your staff have any questions regarding this letter, please have them contact Mr. David Castellanos (337-291-3112) of this office.

Sincerely,



Brigitte D. Firmin
Field Supervisor
Louisiana Ecological Services Office

cc:

FWS, Fisheries Conservation Office, Baton Rouge, LA
FWS, Migratory Birds Program, Atlanta, GA
Coastal Protection and Restoration Authority (CPRA), Baton Rouge, LA
National Marine Fisheries Service, Baton Rouge, LA
LA Dept. of Wildlife and Fisheries, Baton Rouge, LA
LA Dept. of Energy and Natural Resources (CMD), Baton Rouge, LA

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REGION 6

DALLAS, TX 75270

July 17, 2024

Via Electronic Mail

Ms. Sandra Stiles
U.S. Department of the Army Corps of Engineers
New Orleans District
Attn: CEMVN-PDC-C
7400 Leake Avenue
New Orleans, Louisiana 70118

RE: Request for Scoping Comments and Notice of Intent to prepare a Supplemental Environmental Impact Statement for the Morganza to the Gulf of Mexico, Louisiana, Hurricane and Storm Damage Risk Reduction (MTG) Project

Dear Ms. Stiles:

Pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500 – 1508), and our NEPA review authority under Section 309 of the Clean Air Act, the Region 6 office of the U.S. Environmental Protection Agency (EPA) reviewed the U.S. Department of the Army, Corps of Engineers' (USACE) Notice of Intent to prepare a Supplemental Environment Impact Statement (EIS) for the Morganza to the Gulf of Mexico Hurricane and Storm Damage Risk Reduction Project (MTG), in the June 20, 2024 Federal Register. The proposed Supplemental EIS supplements the Revised Programmatic EIS, that was integrated with the 2013 Final Post Authorization Change Report.

The proposed action consists of approximately 98 miles of levee system, including associated navigation, roadway, pump station fronting protection, and environmental control structures located about 60 miles southwest of New Orleans, Louisiana and includes most of Terrebonne Parish, and a portion of Lafourche Parish between the Terrebonne Parish eastern boundary and Bayou Lafourche. The purpose of this project is to reduce the risk of damage caused by hurricane storm surges. The mitigation plan for the constructible features includes restoration of 427 acres of intermediate marsh, 358 acres of brackish marsh, and 975 acres of saline marsh.

The Supplemental EIS will evaluate a reasonable range of alignment modifications that considers existing levee alignments, the least environmental damaging preferred alignment maximizing avoidance and minimization measures to sensitive habitats, and a no-action alternative.

The Supplemental EIS may analyze impacts on tidal wetlands and other waters of the U.S., aquatic resources, essential fish habitat, threatened and endangered species and their critical habitats, cultural resources, soils, navigation and navigable waters, transportation and traffic, hydrology and hydraulics, induced flooding, environmental justice, and cumulative effects of related projects in the regional area. The following recommendations are provided for your consideration when preparing a Supplemental EIS for the proposed action.

Air Quality

EPA recommends the Supplemental EIS provides a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS) and non-NAAQS pollutants, criteria pollutant nonattainment areas, and potential air quality impacts of the proposed project. Such an evaluation is necessary to understand the potential impacts from temporary, long-term, or cumulative degradation of air quality.

We recommend the Supplemental EIS describes and estimates air emissions from potential construction, maintenance and operation activities, as well as proposed mitigation measures to minimize those emissions. Additionally, EPA recommends an evaluation of the following measures to reduce emissions of criteria air pollutants and hazardous air pollutants (air toxics):

- ***Existing Conditions*** – We recommend the Supplemental EIS provides a detailed discussion of ambient air conditions, NAAQS, and criteria pollutant nonattainment areas in the vicinity of the project.
- ***Quantify Emissions*** – EPA recommends the Supplemental EIS estimates emissions of criteria and hazardous air pollutants (air toxics) from the proposed project and discuss the timeframe for release of these emissions over the lifespan of the project and describe and estimate emissions from potential construction activities, as well as proposed mitigation measures to minimize these emissions. The Supplemental EIS should also consider any expected air quality/visibility impacts to Class I Federal Areas identified in 40 CFR Part 81, Subpart D.
- ***Specify Emission Sources*** – We recommend the Supplemental EIS specifies all emission sources by pollutant from mobile sources (on and off-road), stationary sources (including portable and temporary emission units), fugitive emission sources, area sources, and

ground disturbance. This source specific information should be used to identify appropriate mitigation measures and areas in need of the greatest attention.

- ***Construction Emissions Mitigation Plan*** – EPA recommends the Supplemental EIS includes a draft Construction Emissions Mitigation Plan and ultimately adopt this plan in the Record of Decision. We recommend all applicable local, state (e.g., coordination of land-clearing activities with the state air quality agency to determine air quality conditions such as atmospheric inversions prior to performing open burning activities), or Federal requirements (e.g., certification of non-road engines as in compliance with the EPA Tier 4 regulations found at 40 CFR Parts 89 and 1039) be included in the Construction Emissions Mitigation Plan in order to reduce impacts associated with emissions of particulate matter and other toxics from any potential construction-related activities.

Hazardous Materials, Hazardous Waste, and Solid Waste

EPA recommends the Supplemental EIS addresses potential direct, indirect, and cumulative impacts of solid and hazardous waste from construction, maintenance, and operation of the proposed project. The Supplemental EIS should identify projected solid and hazardous waste types, volumes, accidental releases, and expected storage, disposal, management, safety, and contingency plans, as appropriate. We recommend USACE addresses the applicability of state and federal hazardous waste requirements. Appropriate mitigation should be evaluated, including measures to minimize the generation of hazardous waste (i.e., hazardous waste minimization). Alternate industrial processes using less toxic materials should be evaluated as mitigation since such processes could reduce the volume or toxicity of hazardous materials requiring management and disposal as hazardous waste. We recommend USACE identifies the location of hazardous waste and toxic chemical sites within the scope of the project's geographical area and discuss any relevant information associated with the construction, maintenance, and operation of the proposed action.

Water Resources and Water Quality

EPA recommends the USACE complies with applicable Clean Water (i.e., Sections 404, 402, and Section 303(d)) and Safe Drinking Water Acts for the proposed project and include a discussion in the Supplemental EIS. If vegetation is to be disturbed, the EPA recommends that revegetation techniques are included, along with a revegetation monitoring strategy.

EPA recommends identifying all local waterbody segments that may be impacted by the proposed action. To ensure the proposed action does not cause significant long-term impacts to local waterbodies, USACE should identify any impaired waterbodies, their impairment, and mitigation strategies.

Section 404 of the Clean Water Act (CWA 404) regulates the discharge of dredged or fill material into waters of the United States, including wetlands, streams, and other special aquatic sites. An evaluation of the project alternatives, as well as alternatives to avoid and minimize impacts, and a compensatory mitigation plan for unavoidable CWA 404 impacts will ensure that the documentation has sufficient information to demonstrate whether potential adverse impacts to aquatic resources have been adequately characterized and addressed.

For 40 CFR § 122.26(b)(14)(x) and 40 CFR § 122.26(b)(15)(i) National Pollutant Discharge Elimination System (NPDES) regulations (applicable to State NPDES programs, see § 123.25) which authorize the discharge of stormwater from large and small construction activities, all entities associated with a construction project who: 1) meet the NPDES permitting authority's definition of "operator," 2) cause an earth disturbance of 1 acre or greater, or less than one acre if part of a larger common plan of development or sale that ultimately disturbs 1 acre or greater, and 3) discharge stormwater from their construction activities (including any on- and off-site construction support activities), are required to obtain NPDES permit coverage via the Construction General Permit (CGP) or other NPDES permit from the NPDES permitting authority prior to beginning construction activities and/or construction support activities.

Because the overall earth disturbance of this project is greater than 1 acre, the larger common plan of development or sale is triggered at each location, therefore stormwater discharges from all construction activities and on-site or off-site construction support activities (i.e., borrow pits, staging areas, material storage areas, temporary batch plants, laydown areas, etc.) are required to obtain NPDES permit coverage via the CGP or other NPDES permit (except any portion of the project's construction activities that is covered by a CWA 404 permit or waived from permit coverage) regardless if the smaller project's earth disturbance is less than 1 acre at each location. In Louisiana, the Louisiana Department of Environmental Quality (LDEQ) is the NPDES permitting authority, except on Indian Country.

Environmental Justice and Impacted Communities

EPA recommends USACE complies with Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, and Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad*.

We recommend the Supplemental EIS includes an evaluation of minority and low-income populations in proximity to the geographic scope of the proposed action and use of available tools (e.g., EJ Screen Mapping Tool¹, U.S. Census Bureau, area knowledge) to identify and screen populations potentially impacted by the proposed action. Figures and maps should

¹ www. <https://ejscreen.epa.gov/mapper/>

depict the various alternatives considered in relation to the study area, including natural resources, schools, minority and low-income populations, and impacted stakeholders. Also, EPA recommend USACE utilizes the Promising Practices for EJ Methodologies in NEPA Reviews² to supplement the applicable requirements for considering and analyzing minority and low-income populations for the proposed action.

EPA recommends USACE performs meaningful engagement and comprehensive outreach with minority and low-income population and applicable stakeholders to notify them of potential impacts of the proposed action. Meetings should be held at times and in locations that are easily accessible by the minority and low-income populations and applicable stakeholders. We recommend the comprehensive communication strategy includes various forms of media and languages to adequately inform communities impacted by the proposed action.

Guidance³ by the CEQ clarifies the terms low-income and minority population and describes the factors to consider when evaluating disproportionately high and adverse impacts from the proposed and connected actions. USACE should incorporate a discussion in the Supplemental EIS whether and how the proposed action creates or increases disproportionately high and adverse impacts to the minority and low-income populations and affects previous mitigation measures at the existing operations and facilities, connected actions, and proposed mitigation measures for the proposed action. If the proposed action tiers from an EIS, EPA recommends the analysis is applicable for the proposed specific actions and conditions, as warranted, and incorporated by reference.

Additionally, EPA recommends USACE discusses the cumulative impacts of approved projects, concurrently proposed projects, and reasonably foreseeable planned actions on minority and low-income populations in the project's geographical area. The Supplemental EIS should discuss the short- and long-term effects of the proposed action on the surrounding area, community resiliency, backwater flow, induced flooding, socioeconomic factors, and other impacts to environmental justice populations.

Consultation with Tribal Governments

EPA recommends the USACE complies with Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments* (November 6, 2000) as applicable. We recommend the Supplemental EIS describes the process and outcome of government-to-government consultation between USACE and each of the tribal governments affected by the

² <https://www.epa.gov/environmentaljustice/ej-iwg-promising-practices-ej-methodologies-nepa-reviews>

³ Environmental Justice Guidance under the National Environmental Policy Act, Appendix A (Guidance for Federal Agencies on Key Terms in Executive Order 12898), CEQ, December 10, 1997.

proposed action, issues that were raised (if any), and how those issues were addressed in the selection of the proposed alternative.

Children's Health and Safety

Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks* directs each Federal agency, to the extent permitted by law, to make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children, and to ensure that its policies, programs, activities, and standards address these risks. The America's Children and Environment Report presents data on children's environmental health at: <https://www.epa.gov/children>. We recommend the environmental document address impacts of the proposed action on children's health and safety, as applicable.

Pesticides

EPA recommends limited use of pesticides and herbicides near riparian zones and surface water systems. Measures should be taken to avoid pesticide and herbicide run-off into surface and ground waters. EPA Endangered Species Protection Act Bulletins are published for Pesticide Use Limitation Areas, which are areas where certain pesticide active ingredients and/or products are limited due to adverse effects on endangered species. EPA recommends USACE reviews and implements EPA Endangered Species Protection Act Bulletins, as appropriate. Those who apply Restricted Use Pesticides in Indian Country are required to hold a "Federal Certification to Apply Restricted Use Pesticides in Indian Country" certificate, in addition to applicable state certifications in the appropriate categories for the pesticide application. Additionally, it is recommended that those who apply general use or limited use pesticides in Indian Country hold a federal certificate to ensure understanding of all federal rules associated with the application of pesticides in Indian Country.

General Comments

Pursuant to 40 CFR § 1502.17, the Supplemental EIS or appendix shall include a summary of information submitted by commenters during the scoping process for consideration in the development of the Supplemental EIS. Additionally, pursuant to 40 CFR § 1502.15, the Supplement EIS shall succinctly describe the environment of the area(s) to be affected by the alternatives under consideration. Further, USACE shall use high-quality information, including reliable data and resources, models, and indigenous knowledge, to describe reasonably foreseeable trends and provide relevant information consistent with § 1502.21.

Lastly, the NEPAassist Tool is available for use in the environmental review process and project planning and can be located at: <https://www.epa.gov/nepa/nepassist>. The following resources may be helpful:

- EnviroMapper: <https://enviro.epa.gov/enviro/em4ef.home>

- Envirofacts: <https://enviro.epa.gov/>
- 303(d) Listed Impaired Waters: <https://www.epa.gov/tmdl>

If you have any questions regarding our recommendations, please contact Kimeka Price at (214) 665-7438 or price.kimeka@epa.gov.

Sincerely,

Robert Houston
Branch Manager
Environmental Justice, Community Engagement and
Environmental Review Division

Part 4: Notice of Availability of Draft SEIS for Public Review

factors set forth in Rule 214(d) of the Commission’s Rules and Regulations.¹¹ A person obtaining party status will be placed on the service list maintained by the Secretary of the Commission and will receive copies (paper or electronic) of all documents filed by the applicant and by all other parties.

Tracking the Proceeding

Throughout the proceeding, additional information about the project will be available from OPP at (202) 502–6595 or on the FERC website at www.ferc.gov using the “eLibrary” link as described above. The eLibrary link also provides access to the texts of all formal documents issued by the Commission, such as orders, notices, and rulemakings.

In addition, the Commission offers a free service called eSubscription which allows you to keep track of all formal issuances and submittals in specific dockets. This can reduce the amount of time you spend researching proceedings by automatically providing you with notification of these filings, document summaries, and direct links to the documents. For more information and to register, go to www.ferc.gov/docs-filing/esubscription.asp.

Intervention Deadline: 5:00 p.m. Eastern Time on December 23, 2026.
(Authority: 18 CFR 2.1)

Dated: December 2, 2025.
Carlos D. Clay,
Deputy Secretary.
[FR Doc. 2025–22118 Filed 12–4–25; 8:45 am]
BILLING CODE 6717–01–P

DEPARTMENT OF ENERGY

Federal Energy Regulatory Commission

[Docket No. RM98–1–000]

Records Governing Off-the-Record Communications

This constitutes notice, in accordance with 18 CFR 385.2201(b), of the receipt of prohibited and exempt off-the-record communications.

Order No. 607 (64 FR 51222, September 22, 1999) requires Commission decisional employees, who make or receive a prohibited or exempt off-the-record communication relevant to the merits of a contested proceeding, to deliver to the Secretary of the Commission, a copy of the communication, if written, or a summary of the substance of any oral communication.

Prohibited communications are included in a public, non-decisional file associated with, but not a part of, the decisional record of the proceeding. Unless the Commission determines that the prohibited communication and any responses thereto should become a part of the decisional record, the prohibited

off-the-record communication will not be considered by the Commission in reaching its decision. Parties to a proceeding may seek the opportunity to respond to any facts or contentions made in a prohibited off-the-record communication and may request that the Commission place the prohibited communication and responses thereto in the decisional record. The Commission will grant such a request only when it determines that fairness so requires. Any person identified below as having made a prohibited off-the-record communication shall serve the document on all parties listed on the official service list for the applicable proceeding in accordance with Rule 2010, 18 CFR 385.2010.

Exempt off-the-record communications are included in the decisional record of the proceeding, unless the communication was with a cooperating agency as described by 40 CFR 1501.6, made under 18 CFR 385.2201(e) (1) (v).

The following is a list of off-the-record communications recently received by the Secretary of the Commission. Each filing may be viewed on the Commission’s website at <http://www.ferc.gov> using the eLibrary link. Enter the docket number, excluding the last three digits, in the docket number field to access the document. For assistance, please contact FERC Online Support at FERCOnlineSupport@ferc.gov or toll free at (866) 208–3676, or for TTY, contact (202) 502–8659.

Docket Nos.	File date	Presenter or requester
<i>Prohibited:</i>		
1. EL25–44–000	11–14–2025	Electricity Transmission Competition Coalition. Robert Rutkowski.
2. CP25–60–000	11–21–2025	
<i>Exempt:</i>		
1. CP17–101–000, CP20–49–000	12–1–2025	Township of Lawrence, NJ. ¹
2. P–77–000	12–2–2025	U.S. Representative Doug LaMalfa.
3. EL25–49–000, EL25–20–000	11–24–2025	FERC Staff. ²

¹ Certified copy of Resolution No. 354–25 for the County of Mercer, State of New Jersey, Opposing the Northeast Supply Enhancement Project.

² Comments dated 11/13/25 from U.S. Senators Edward J. Markey, Chris Van Hollen, Elizabeth Warren, Peter Welch, Raphael Warnock, Richard Blumenthal, and Adam B. Schiff.

Dated: December 2, 2025.
Carlos D. Clay,
Deputy Secretary.
[FR Doc. 2025–22122 Filed 12–4–25; 8:45 am]
BILLING CODE 6717–01–P

ENVIRONMENTAL PROTECTION AGENCY

[FRL OP–OFA–200]

Environmental Impact Statements; Notice of Availability

Responsible Agency: Office of Federal Activities, General Information 202–993–3272 or <https://www.epa.gov/nepa>.
Weekly receipt of Environmental Impact Statements (EIS) Filed November 21,

2025 10 a.m. EST Through December 1, 2025 10 a.m. EST Pursuant to CEQ Guidance on 42 U.S.C. 4332.

Notice: Section 309(a) of the Clean Air Act requires that EPA make public its comments on EISs issued by other Federal agencies. EPA’s comment letters on EISs are available at: <https://cdxapps.epa.gov/cdx-enepa-II/public/action/eis/search>.

EIS No. 20250163, Final, BLM, CA, Mojave Exploration Drilling Project,

¹¹ 18 CFR 385.214(b)(3) and (d).

Review Period Ends: 01/05/2026,
Contact: Brandon Anderson 760-833-
7100.

EIS No. 20250164, Final, USAF, FL,
SpaceX Starship-Super Heavy Cape
Canaveral Space Force Station,
Contact: Hilary Rummel 321-494-
7732.

EIS No. 20250165, Draft, CHSRA, CA,
California High-Speed Rail Project—
Los Angeles to Anaheim Project
Section, Comment Period Ends: 02/
03/2026, Contact: Stefan Galvez-
Abadia 916-324-1541.

EIS No. 20250166, Draft Supplement,
USACE, LA, Morganza to the Gulf,
Louisiana, Hurricane and Storm
Damage Risk Reduction Project,
Comment Period Ends: 01/23/2026,
Contact: Jason Emery 504-862-2364.

EIS No. 20250167, Draft Supplement,
NHTSA, REG, Draft Supplemental
Environmental Impact Statement
Safer Affordable Fuel-Efficient (SAFE)
Vehicles Rule III for Model Years
2022 to 2031 Passenger Cars and Light
Trucks, Contact: Joseph Bayer 888-
327-4236.

EIS No. 20250168, Final Supplement,
NMFS, VA, ADOPTION—Atlantic
Fleet Training and Testing, Contact:
Alyssa Clevenstine 301-427-8401.

The National Marine Fisheries Service
(NMFS) has adopted the United States
Navy's Final Supplement EIS No.
20250113 filed 08/06/2025 with the
Environmental Protection Agency. The
NMFS was a cooperating agency on this
project. Therefore, republication of the
document is not necessary.

Dated: December 1, 2025.

Nancy Abrams,

Deputy Director, Federal Activities Division.

[FR Doc. 2025-22056 Filed 12-4-25; 8:45 am]

BILLING CODE 6560-50-P

FEDERAL COMMUNICATIONS COMMISSION

[DA 25-946; FR ID 320622]

Media Bureau Revises Filing Schedule for Class A, LPTV, and TV Translator Major Change Applications and for New LPTV and TV Translator Station Applications

AGENCY: Federal Communications
Commission.

ACTION: Notice.

SUMMARY: In this document, the Federal
Communications Commission's Media
Bureau (Bureau) announces that due to
prospective applicants' inability to
access the Commission's Licensing and
Management System (LMS) during the
recent partial lapse in government

funding and therefore prepare and file
applications as previously scheduled, it
is revising the dates for the Class A,
LPTV, and TV translator major
modification and LPTV/TV translator
new station filing opportunities
previously announced in its (*public
notice*), DA 25-792, released September
3, 2025 (September 2025 PN).

DATES: December 11, 2025, 6:00 p.m.
ET, December 18, 2025, 6:00 p.m. ET,
January 29, 2026, 6:00 p.m. ET, March
12, 2026, 6:00 p.m. ET, March 19, 2026,
12:01 a.m. ET

ADDRESSES: None.

FOR FURTHER INFORMATION CONTACT:

Mark Colombo (technical questions),
Mark.Colombo@fcc.gov, (202) 418-7611,
or Shaun Maher (legal questions),
Saun.Maher@fcc.gov, (202) 418-2324,
of the Video Division, Media Bureau.

SUPPLEMENTARY INFORMATION: This is a
synopsis of the Media Bureau's
document, (*public notice*), DA 25-946,
released on November 17, 2025. The full
text of this document is available for
download at [https://docs.fcc.gov/public/
attachments/DA-25-946A1.pdf](https://docs.fcc.gov/public/attachments/DA-25-946A1.pdf). To
request materials in accessible formats
(braille, large print, computer diskettes,
or audio recordings), please send an
email to *FCC504@fcc.gov* or call the
Consumer & Government Affairs Bureau
at (202) 418-0530 (VOICE), (202) 418-
0432 (TTY).

Synopsis

On September 3, 2025, the Bureau
issued its September 2025 PN
announcing a phased approach
permitting Class A television, LPTV,
and TV translator stations to resume
filing major modification applications
and allowing for the filing of new LPTV
and TV translator station applications.
In light of prospective applicants'
inability to access the Commission's
LMS during the recent partial lapse in
government funding—and therefore
prepare and file applications as
previously scheduled—the Bureau is
revising the dates for the filing
opportunities previously announced in
the September 2025 PN. Except for the
revised dates announced below, all
processes and procedures previously
announced by the Bureau in the
September 2025 PN pertaining to these
filing opportunities remain the same.
The freeze on all major change
applications implemented by the
Bureau on September 3, 2025 in the
September 2025 PN, remains in effect
until it is lifted pursuant to the revised
schedule.

*Revised Freeze/Filing Opportunity
Dates:*

On December 11, 2025 at 6:00 p.m. ET
a temporary application filing freeze
will be implemented on all minor
change applications (including
displacement applications) for Class A,
LPTV, and TV translator stations. Minor
change applications filed once the
freeze is imposed will be dismissed and
need to be re-filed after the freeze is
lifted.

On December 18, 2025 at 12:01 a.m.
ET the major modification filing freeze
will be lifted to permit Class A, LPTV,
and TV translator stations to file major
change applications, on a first-come,
first-served basis. Facility relocations
are limited to no more than 121.0
kilometers (km). Major change
applications submitted during this filing
opportunity must meet the 121.0 km
distance limit and otherwise comply
with the Commission's part 73 and 74
rules. All other applications will be
dismissed. The filing freeze on all minor
change applications (including
displacement applications) for Class A,
LPTV, and TV translator stations will
also be lifted.

On January 29, 2026 at 6:00 p.m. ET
a temporary application filing freeze
will be implemented for all major
change applications for Class A, LPTV,
and TV translator stations. Major change
applications filed once the freeze is
imposed will be dismissed and need to
be re-filed after the freeze is lifted.

On March 12, 2026 at 6:00 p.m. ET a
temporary application filing freeze will
be implemented for all minor change
applications (including displacement
applications) for Class A, LPTV, and TV
translator stations. Minor change
applications filed once the freeze is
imposed will be dismissed and need to
be re-filed after the freeze is lifted.

On March 19, 2026 at 12:01 a.m. ET
the major modification filing freeze will
be lifted, without limit or restriction, to
permit the filing of Class A, LPTV and
TV translator major change applications
and acceptance of applications for new
LPTV and TV translators stations, on a
first-come, first-served basis. The freeze
on all minor change applications
(including displacement applications)
for Class A, LPTV, and TV translator
stations will also be lifted.

This action is taken by the Acting
Chief, Media Bureau, pursuant to
authority delegated by §§ 0.61 and 0.283
of the Commission's rules. 47 CFR 0.61
and 0.283.

Federal Communications Commission.

Thomas Horan,

Chief of Staff, Media Bureau.

[FR Doc. 2025-22017 Filed 12-4-25; 8:45 am]

BILLING CODE 6712-01-P

Part 5: Public Meetings for Draft SEIS



PRESS RELEASE

U.S. ARMY CORPS OF ENGINEERS

BUILDING STRONG®

For Immediate Release:
July 1, 2024

Public Affairs: Melanie Oubre
(504) 862-2587
Melanie.E.Oubre@usace.army.mil

Public Scoping Meetings scheduled for Morganza to the Gulf

Meetings will gather public input for the Morganza to the Gulf Project

NEW ORLEANS – The U.S. Army Corps of Engineers announced three public scoping meetings will be held on the Morganza to the Gulf (MTG) Supplemental Environmental Impact Statement (SEIS).

The SEIS will evaluate design changes to the authorized MTG project to meet the one percent Annual Exceedance Probability (AEP) Storm Surge Risk Reduction (100-year level of risk reduction).

Public Meeting Schedule:

Tuesday, July 30th, 2024
North Lafourche Levee District
3862 Highway 1, Raceland, LA 70394
6 p.m. – 8 p.m.

Thursday, August 1st, 2024
Montegut Fire Station
1105 LA-55, Montegut, LA 70377
6 p.m. – 8 p.m.

Monday, August 5th, 2024
Barry P. Bonvillain Civic Center
346 Civic Center Blvd., Houma, LA 70360
6 p.m. – 8 p.m.

Each meeting will feature a short presentation and open house where the public can ask questions of and give feedback to USACE employees. A virtual meeting will be scheduled at a later date. The public will be notified via press release, social media, and the USACE website.

Background: The MTG hurricane and storm damage risk reduction project is a levee system located approximately 60 miles southwest of New Orleans, Louisiana and includes most of Terrebonne Parish and a portion of Lafourche Parish between the Terrebonne Parish eastern boundary and Bayou Lafourche. The purpose of this project is to reduce the risk of damage caused by hurricane storm surges.

A review of the project is needed because of the increasing susceptibility of coastal communities to storm surge due to wetland loss, sea level rise, and subsidence. The MTG Project was initially authorized by Section 1001(24) of the Water Resources Development Act (WRDA) of 2007 in accordance with the Reports of the Chief of Engineers dated 23 August 2002 and 22 July 2003, at a total cost of \$886.7 million.

The project was redesigned in the 2013 Integrated Revised Programmatic EIS (RPEIS) and Post Authorization Change Report, both to address the project cost increase beyond the statutory limitation in accordance with Section 902 of the WRDA of 1986, as amended, and to meet updated post-Hurricane Katrina design guidelines. The MTG Project was subsequently re-authorized by Section 7002(3)5 of the Water Resources

U.S. ARMY CORPS OF ENGINEERS

7400 Leake Avenue, New Orleans, LA 70118 | www.mvn.usace.army.mil
www.facebook.com/usacenola
www.twitter.com/teamneworleans

Reform and Development Act of 2014 in accordance with the Report of the Chief of Engineers dated 8 July 2013, at an updated total cost of \$10,265,100,000.

The MTG project was authorized to provide the 1% AEP level of hurricane and storm damage risk reduction while maintaining navigational passage and tidal exchange. The project consists of approximately 98 miles of levee including associated navigation, roadway, pump station fronting protection, and environmental control structures. The 2013 RPEIS provided an assessment for both programmatic and constructible features for the MTG project. Constructible features consisted of those project features that were determined to have sufficient design details to be constructed. Constructible features included levee reaches F1, F2, G1; the HNC Lock; and the Bayou Grand Caillou Floodgate. The remaining features were designed to a programmatic design level that would require supplemental National Environmental Policy Act documentation prior to construction. The mitigation plan for the constructible features included restoration of 427 acres of intermediate marsh, 358 acres of brackish marsh and 975 acres of saline marsh.

This SEIS will disclose the context and intensity of environmental impacts, including indirect and cumulative effects, for the final array of levee alignments and associated features. Any required mitigation will also be discussed.

The public scoping period is extended until August 26, 2024. Comments must be submitted by this date to ensure they are considered in the planning of the project and captured in the Scoping Report.

Scoping comments can be submitted during the public meetings or by mail to:

U.S. Army Corps of Engineers, New Orleans District
Attn: CEMVN-PDS
7400 Leake Avenue, New Orleans, Louisiana 70118.
Or email: mvnenvironmental@usace.army.mil

Questions regarding the proposed action should be directed to Ms. Sandra Stiles:

U.S. Army Corps of Engineers, New Orleans District
Attn: CEMVN-PDS, 7400 Leake Avenue, New Orleans, Louisiana 70118
Phone (504) 862-2862
Email Sandra.E.Stiles@usace.army.mil

For more information on the Morganza to the Gulf project, visit
<https://www.mvn.usace.army.mil/About/Projects/Morganza-to-the-Gulf/>

###

THANK YOU FOR JOINING US

Our presentation will begin momentarily

The Morganza to the Gulf Draft Supplemental Environmental Impact Statement (SEIS) Public Comment Period

Project Website:

<https://www.mvn.usace.army.mil/About/Projects/Morganza-to-the-Gulf/Documents/>



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MORGANZA TO THE GULF, LOUISIANA HURRICANE AND STORM DAMAGE RISK REDUCTION PROJECT

Public Meeting for the Draft Supplemental Environmental Impact Statement



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MEETING PURPOSE AND AGENDA

Why are we here?

Provide an update on the Morganza to the Gulf, LA Hurricane and Storm Damage Risk Reduction Project and receive public feedback on the DSEIS and appendices during the 45-day comment period.

Agenda

- Rules of Engagement
- Public Meeting Schedule
- Project Details
- Proposed Alternatives
- Environmental Consequences
- Project Timeline
- Opportunities to Comment
- Opportunities for Individual Discussions



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RULES OF ENGAGEMENT

In-Person Participation

- Comments will be taken after presentation is completed.
- Avoid interrupting the panel, moderator, or fellow attendees.

Submit Comments

- Email mvnenvironmental@usace.army.mil
- Scan QR Code
- Comment Card
- Court Reporter
- Mail: Mr. Jason Emery; Chief, Environmental Planning Branch
U.S. Army Corps of Engineers
New Orleans District, CEMVN-PDS
7400 Leake Ave. New Orleans, LA 70118

<https://www.mvn.usace.army.mil/About/Projects/Morganza-to-the-Gulf/Documents>



Reminder - public comment period ends January 23, 2026



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PUBLIC MEETING SCHEDULE

In-Person Meetings

Area: Theriot, LA

Date: Thursday January 8, 2026

Time(s): 2:00 – 4:00 PM; 6:00 – 8:00 PM

Location: Dularge Gym, 1330 Dr. Beatrous Road, Theriot, LA

Area: Houma, LA

Date: Thursday January 15, 2026

Time(s): 2:00 – 4:00 PM; 6:00 – 8:00 PM

Location: Barry P. Bonvillian Civic Center, 346 Civic Center Boulevard, Houma, LA

Area: Lafourche Parish

Date: Tuesday, January 20, 2026

Time(s): 2:00 – 4:00 PM; 6:00 – 8:00 PM

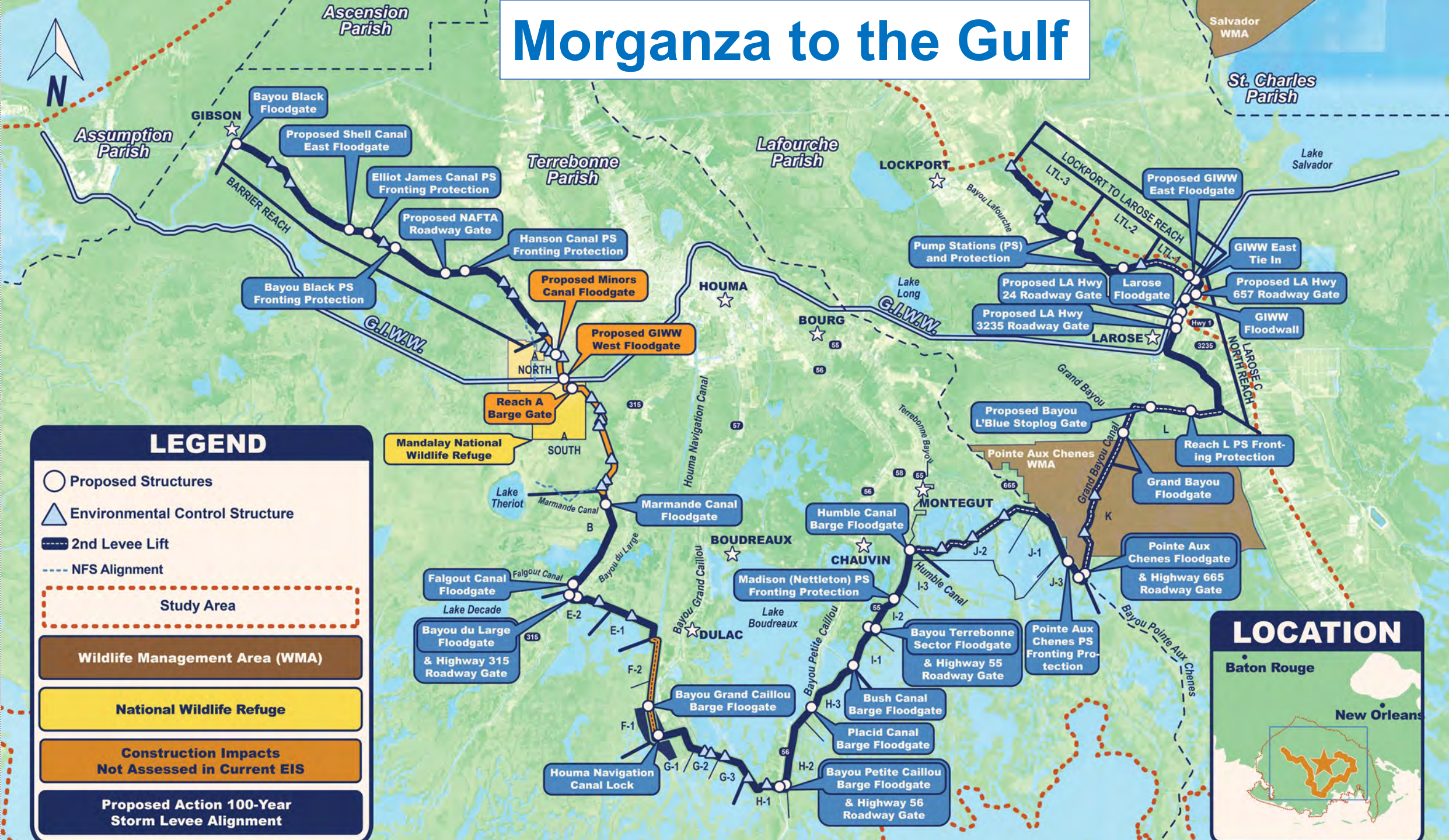
Location: Bollinger Sisters Suite (in Student Union Addition), Nichols State University, 103 Leighton Dr., Thibodaux, LA



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Morganza to the Gulf



PROJECT OVERVIEW

Problem

- Increasing susceptibility of communities to storm surge due to wetland loss, sea level change, and subsidence.

Purpose

- Provide risk reduction for more than 200,000 people in the study area for storms up to a 1% Annual Exceedance Probability (AEP)

Background

- Project most recently authorized in accordance with the 2013 Post-Authorization Change Report/Revised Programmatic EIS (2013 PACR/RPEIS) and updated in the 2021 Engineering Documentation Report (EDR)

Recent Changes

- Design changes to reduce costs while maintaining the authorized 1% AEP level of risk reduction
- Shifts in the proposed footprint to coincide with existing non-federal levees to reduce the amount of required fill for levee construction and minimize construction impacts to wetland habitat.



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MORGANZA TO THE GULF LEVEE SYSTEM

NON-FEDERAL SPONSORS

- Invested over \$1.1B along MTG alignment
 - 80+ miles of levee constructed
 - 25+ structures
 - Houma Navigation Canal Lock Complex
 - Ongoing levee lifts
- Collaborating on current designs
- Benefits demonstrated 99% residential flooding reduction between 2005 (Hurricane Rita) and 2019 (Hurricane Barry) but still vulnerable to greater storms



Covered under different NEPA documents

MORGANZA TO THE GULF LEVEE SYSTEM FEDERAL WORK UNDERWAY

FY 2021 New Start

- Humble Canal Preload & PED

FY 2022 Bipartisan Infrastructure Law (Design & Construction)

- Reach A Levee portion
- Lockport to Larose Levee portion
- Minors Canal Floodgate
- GIWW West Floodgate
- GIWW East Floodgate
- Humble Canal Floodgate

FY 2022 Community Fund (Earmark)

- Reach F Design
- Reach J-2 Design
- Shell Canal Floodgate Design

FY 2023 Community Fund (Earmark)

- Reach L Design
- Reach K Design
- Bayou Terrebonne Floodgate Design

FY 2024 Community Fund (Earmark)

- Reach A Levee Const. (Contract 1)
- Design of Critical Features
- Environmental Coord.



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NLLD

North Lafourche Levee District

Covered under different NEPA documents

MORGANZA TO THE GULF LEVEE SYSTEM

FEDERAL WORK UNDERWAY

Features Under Design by USACE

- Shell Canal Floodgate
- Minors Canal Floodgate*
- GIWW West Floodgate*
- Reach A Levee & Env. Control Structures*
- Reach F Levee*
- Bayou Terrebonne Floodgate
- Humble Canal Floodgate
- Reach J2 Levee
- Reach K Levee & Env. Control Structures
- Reach L Levee
- Bayou L'Bleu Floodgate
- GIWW East Tie-in/Floodwall
- GIWW East
- Lockport to Larose Reach 1 Levee & Env. Control Structures

Features Partially Funded for Construction

- Reach A Levee portion*
- Lockport to Larose Levee portion
- Minors Canal Floodgate*
- GIWW West Floodgate*
- GIWW East Floodgate
- Humble Canal Floodgate



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NLLD

North Lafourche Levee District

Covered under different NEPA documents

DSEIS TABLE OF CONTENTS

SEIS Main Report

Executive Summary
Section 1- Introduction / Purpose and Need
Section 2- Background and History
Section 3- Alternatives
Section 4- Mitigation
Section 5- Affected Environment
Section 6- Environmental Consequences
Section 7- Public and Agency Coordination
Section 8- Compliance with Laws, Regulations,
and Executive Orders
Section 9- List of Preparers and Certifications
Section 10- References
Section 11- Acronyms and Abbreviations

Appendices

Appendix A – Map Books of the Alignment
Appendix B – Project Description
Appendix C – Compensatory Habitat Mitigation Plan
Appendix D – Wetland Value Assessment
Appendix E – Hydrologic Modeling Reports
Appendix F – Agency Coordination
Appendix G – U.S. Fish and Wildlife Coordination Act Report
Appendix H – Induced Flooding Information
Appendix I – Hazardous, Toxic, and Radioactive Waste
Appendix J – Cultural Resources
Appendix K – Water Quality
Appendix L – Public Involvement
Appendix M – Draft Water Control Plan
Appendix N – Endangered Species Act Coordination
Appendix O – Non-Federal Sponsor Construction and
Permitting
Appendix P – Prime and Unique Farmland



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ALTERNATIVES: NO ACTION

- No federal action would be implemented
- Includes levees and structures constructed by local entities prior to executing the Project Partnership Agreement as the Non-Federal Sponsors for the Federal project in 2021.
- Non-federal levees range from 5 to 15 feet (NAVD88) in height
- Non-federal levees and structures do provide some risk reduction but not the level of risk reduction needed for catastrophic hurricane and tropical storms as significant as a 1% AEP (100-year storm) event.

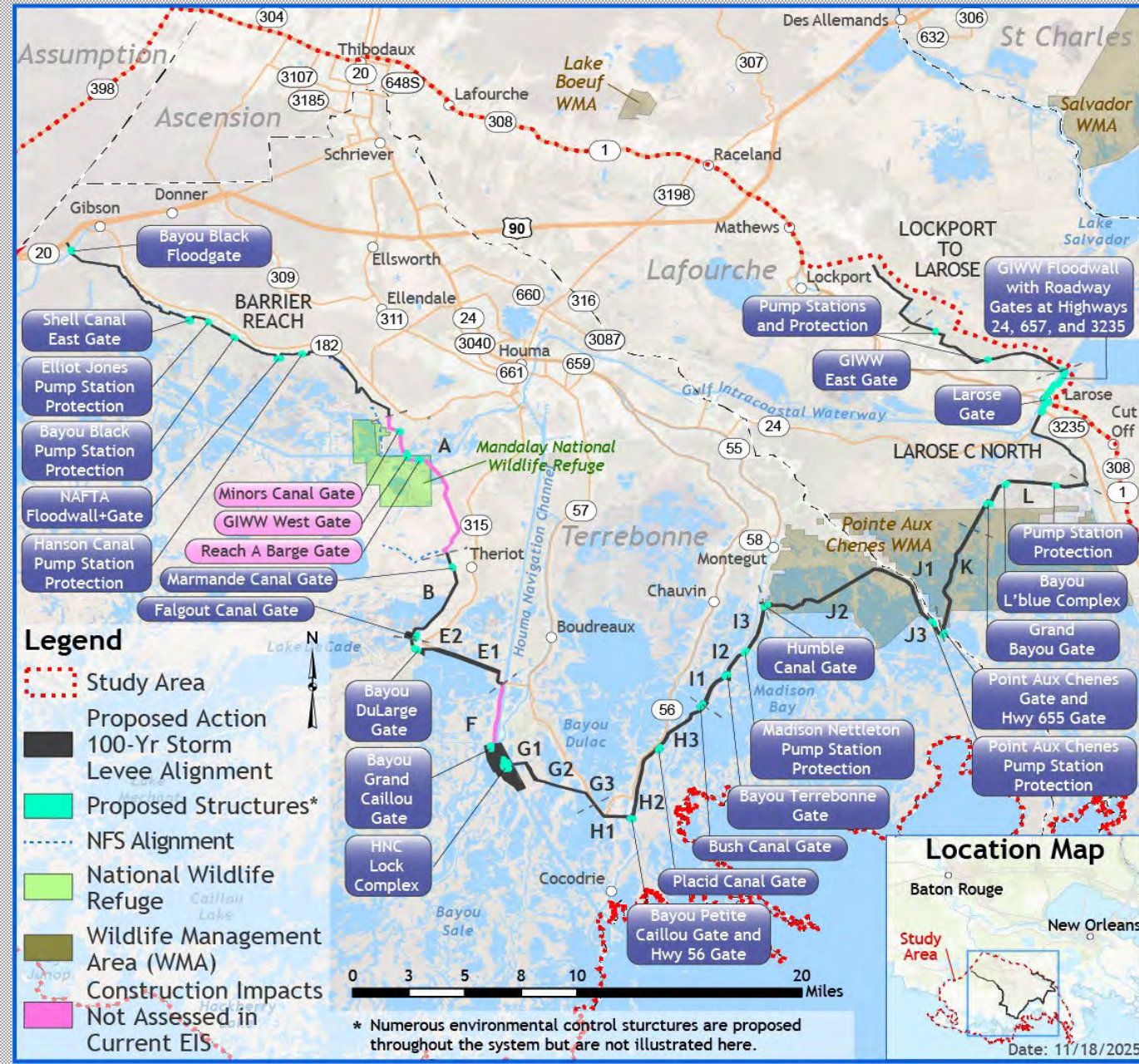


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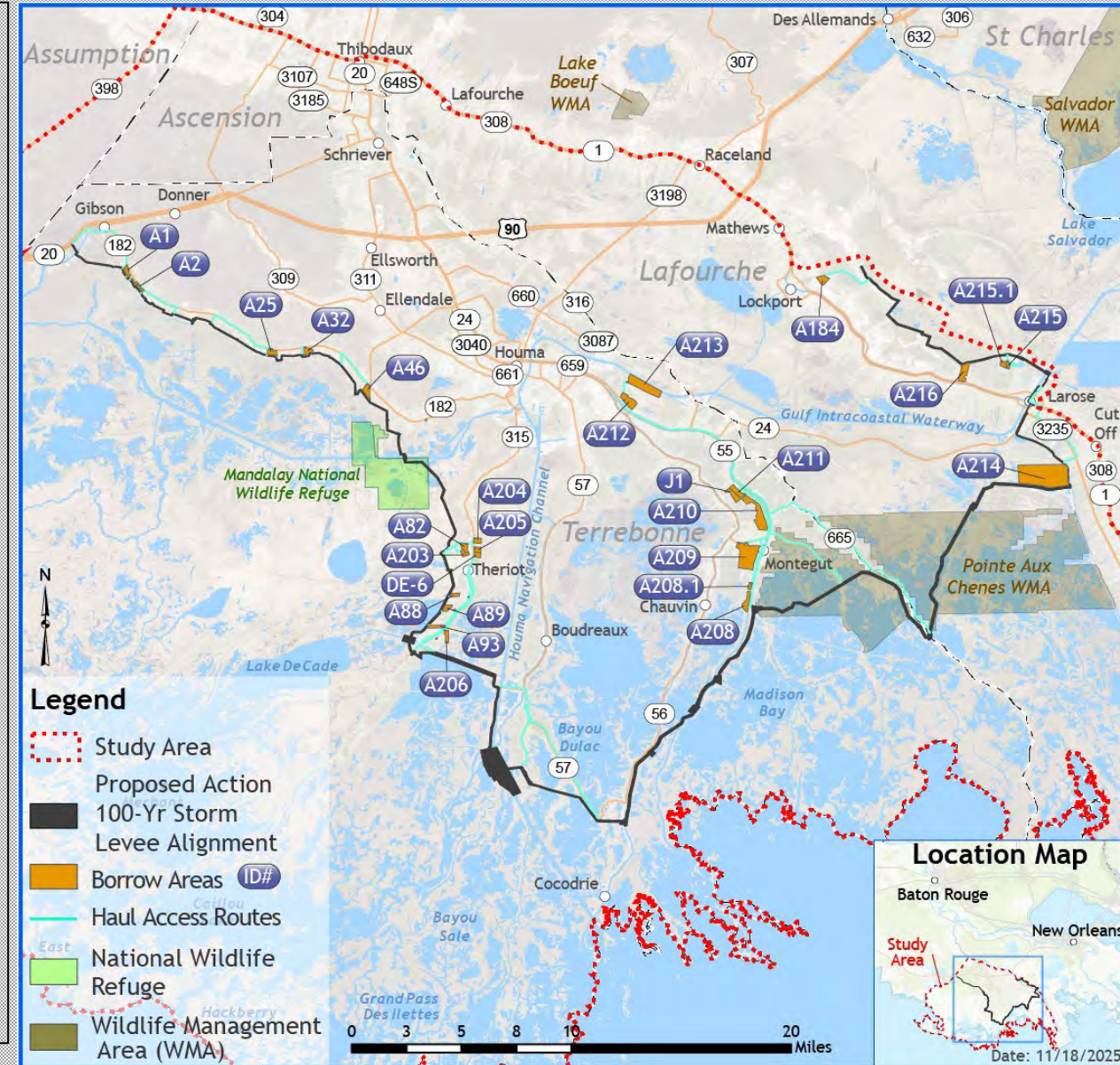
PROPOSED ACTION ALTERNATIVE: LEVEE SYSTEM

- **86 miles** of levees and structures to heights of **11-26 feet** by year 2085
- **24 environmental control structures, 15 navigable floodgates, 9 floodwalls, and 8 roadway floodgates.**
- **1% AEP (100-year) level of risk reduction** through year 2085
- Does **not** include construction of **Reaches A and F**, which are assessed in separate NEPA documents to allow the USACE to begin constructing these high-priority features in advance of the finalization of this SEIS
- Updates the 2013 PACR/RPEIS alignment with design updates and location shifts to coincide with existing levees and reduce impacts.
- **No further alternative formulation** was conducted for this Draft SEIS. Future design changes will be evaluated per ER 1110-2-1150



PROPOSED ACTION ALTERNATIVE: BORROW SITES AND ACCESS ROADS

- Estimated **55 million cubic yards** (cy) of borrow material to construct levees to the 2035 design elevation. Estimated **28 million** more cy to reach 2085 design elevations.
- **27 borrow sites (more than 3,000 acres total)** would be excavated to depths of 20 ft for fill material and hauled via trucks and barges for levee construction.
- USACE used best available data to choose borrow site locations that **avoid significant habitats, cultural sites, and hazardous, toxic, and radioactive waste (HTRW)** concerns.
- Field surveys before construction would confirm the presence or absence of habitats, cultural resources, and HTRW. If present, borrow sites would be re-designed to avoid them or a mitigation plan(s) would be developed.
- Majority of haul/access routes would be on existing roads with exception of a new gravel road constructed along the 40 Arpent Canal for the Lockport to Larose Reach.
- Some material would be delivered using barges on Bayou Terrebonne, Bush Canal, and Bayou Petite Caillou.

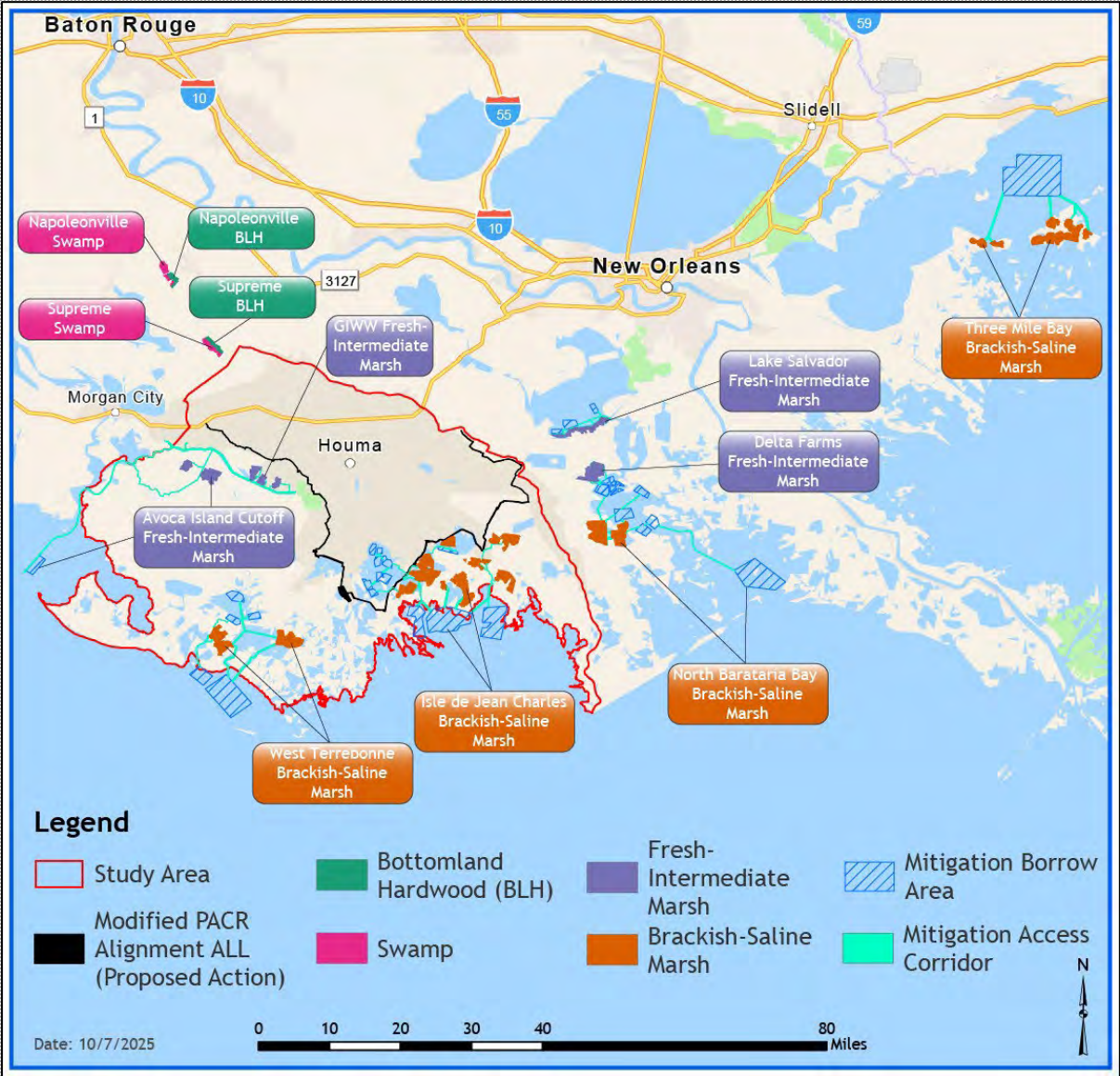


PROPOSED ACTION ALTERNATIVE: HABITAT MITIGATION SITES

Final Array

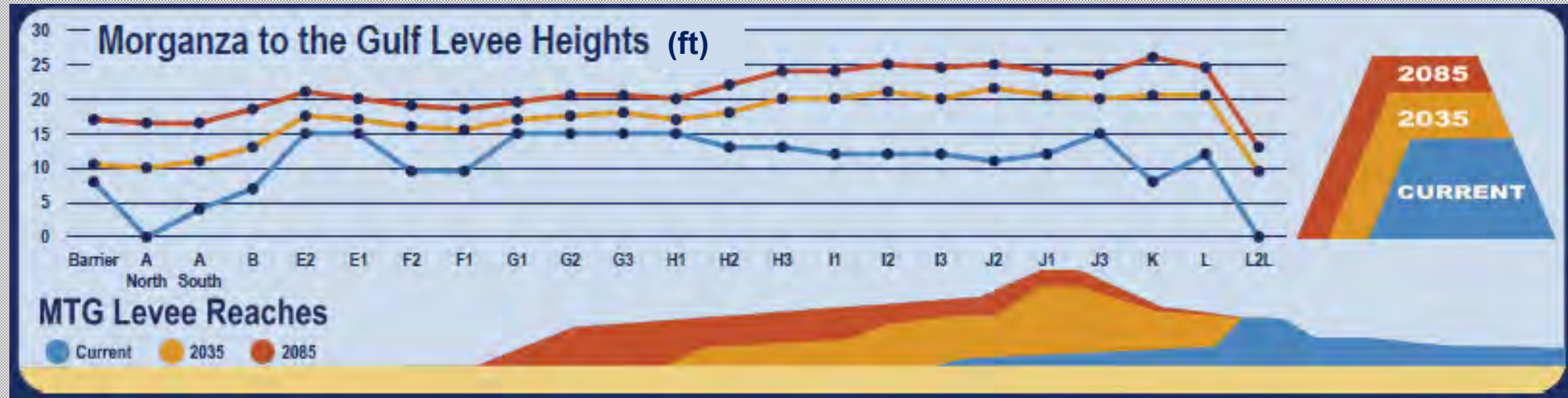
Tentatively Selected Plan

<u>Impacted Habitat Type</u>	<u>Acres</u>	<u>In-Kind Mitigation Tentatively Selected Plan</u>
BLH	588	Napoleonville
Swamp	1,063	Napoleonville
Fresh/ Intermediate Marsh	2,895	Combo Mitigation Bank/Delta Farms
Brackish/Saline Marsh	6,431	Combo Mitigation Bank/West Terrebonne



PROPOSED ACTION IMPLEMENTATION

- Due to its vast size, the project would be constructed in phases in 2026 - 2032
- To maintain the 1% AEP risk reduction in the face of ongoing sea-level change, additional levee lifts are projected to be necessary in 2045 and 2070, with final completion anticipated in 2085.
- Construction would occur from approximately 6:00 a.m. to 9:00 p.m. daily, with some levee reaches and structures built concurrently.



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PROJECT IMPACTS

Overview

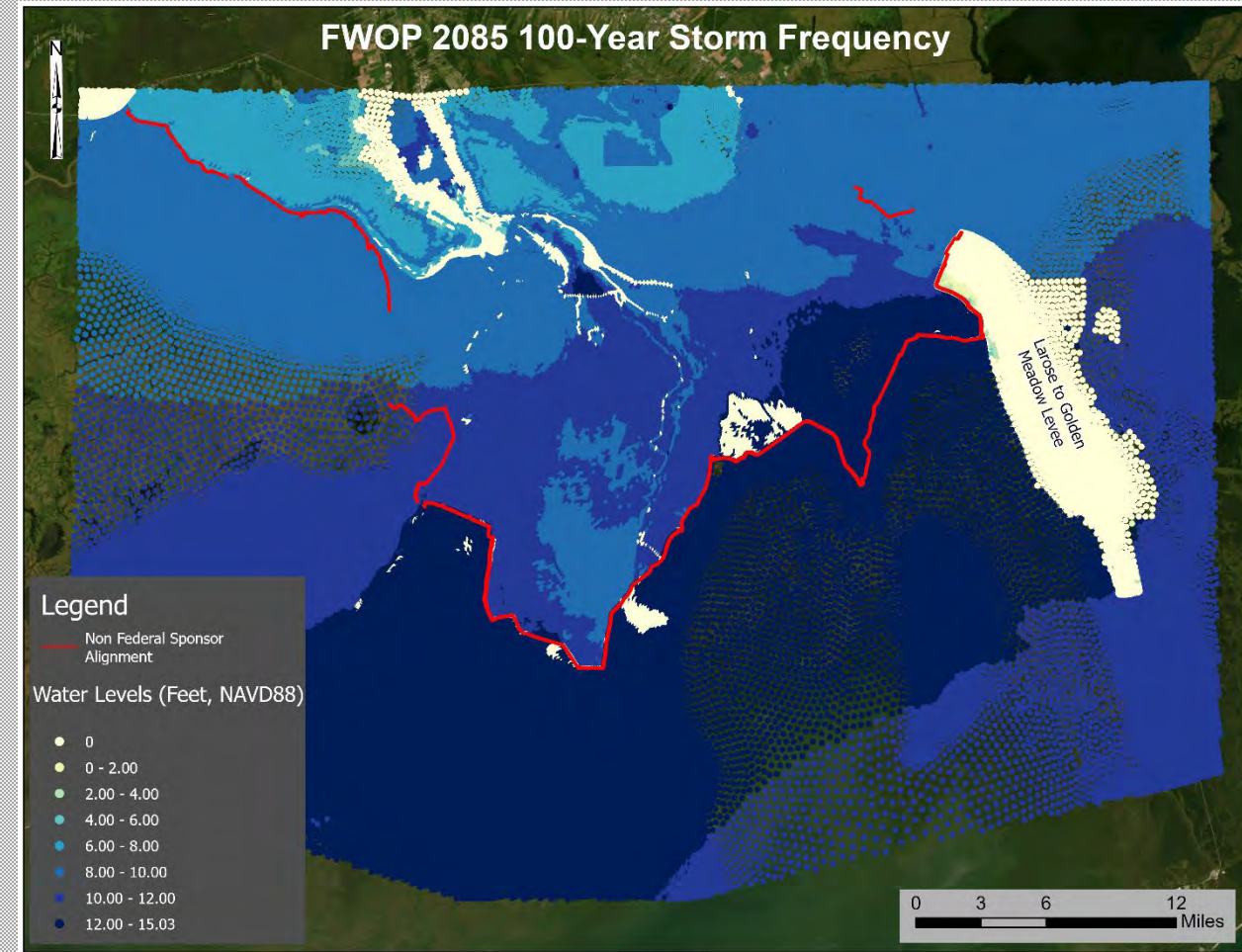
- Storm Surge/Project-Increased Water Levels
- Significant Habitat
- Threatened and Endangered Species
- Essential Fish Habitat
- Wildlife
- Coastal Resources
- Water Quality
- Hazardous, Toxic, and Radioactive Waste (HTRW)
- Recreation/Public Lands
- Farmland
- Traffic & Navigation
- Air & Noise
- Socioeconomics
- Cultural Resources
- Tribal Resources



ASSESSMENT OF CHANGES TO WATER LEVELS

Storm Surge/Project Increased Water Levels

- Coastal Storm Modeling System CSTORM-MS integrates the Advanced Circulation (ADCIRC) model and the Simulating Waves Nearshore (SWAN) model to simulate storm surge and wave dynamics. Water levels would be reduced inside the system
- Assessed the 1% (100-year), 5% (20-year), and 50% (2-year) Annual Exceedance Probability storm events

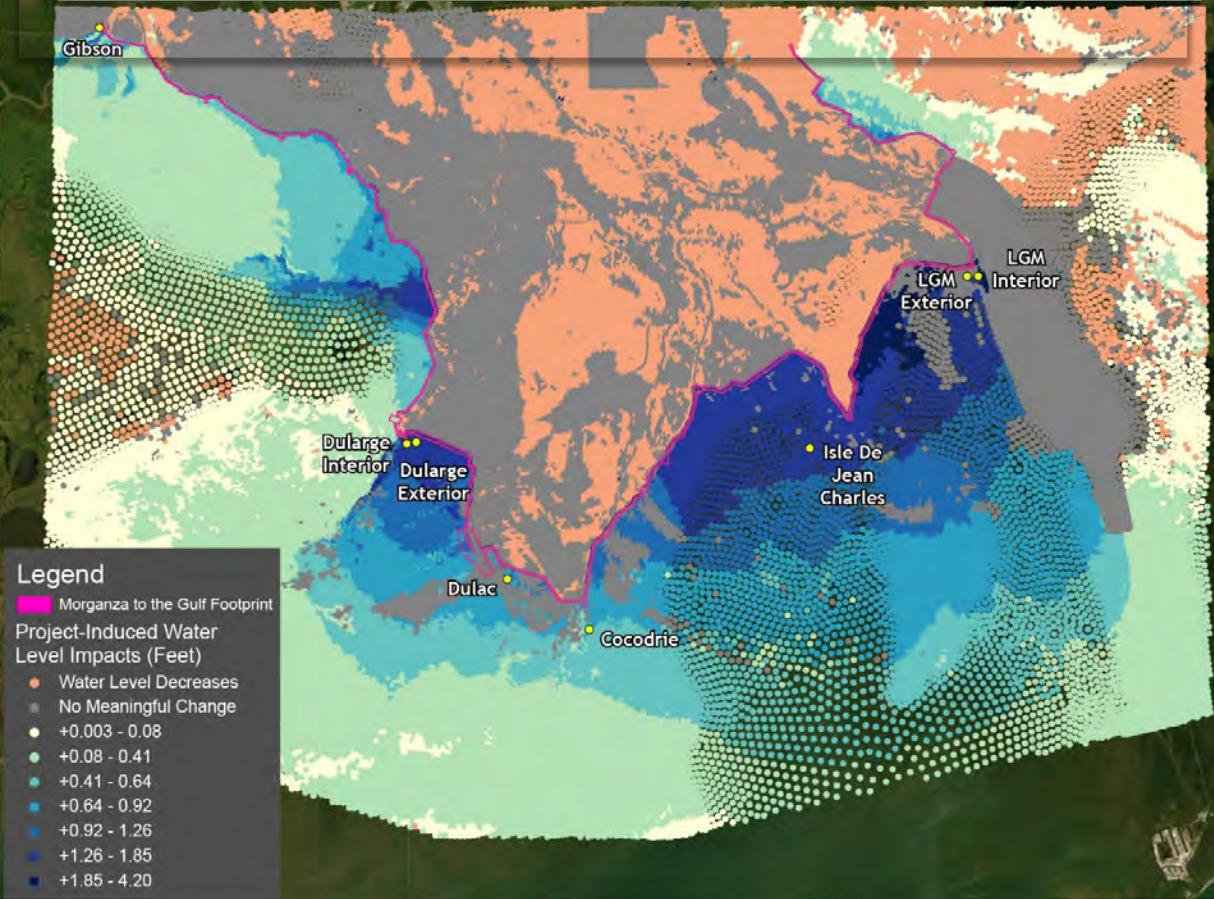


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ASSESSMENT OF CHANGES TO WATER LEVELS

Project-Induced Water Level Differences, 1% AEP (100-Year) Storm Event, 2085



FWOP 2085 100-Year Storm Frequency



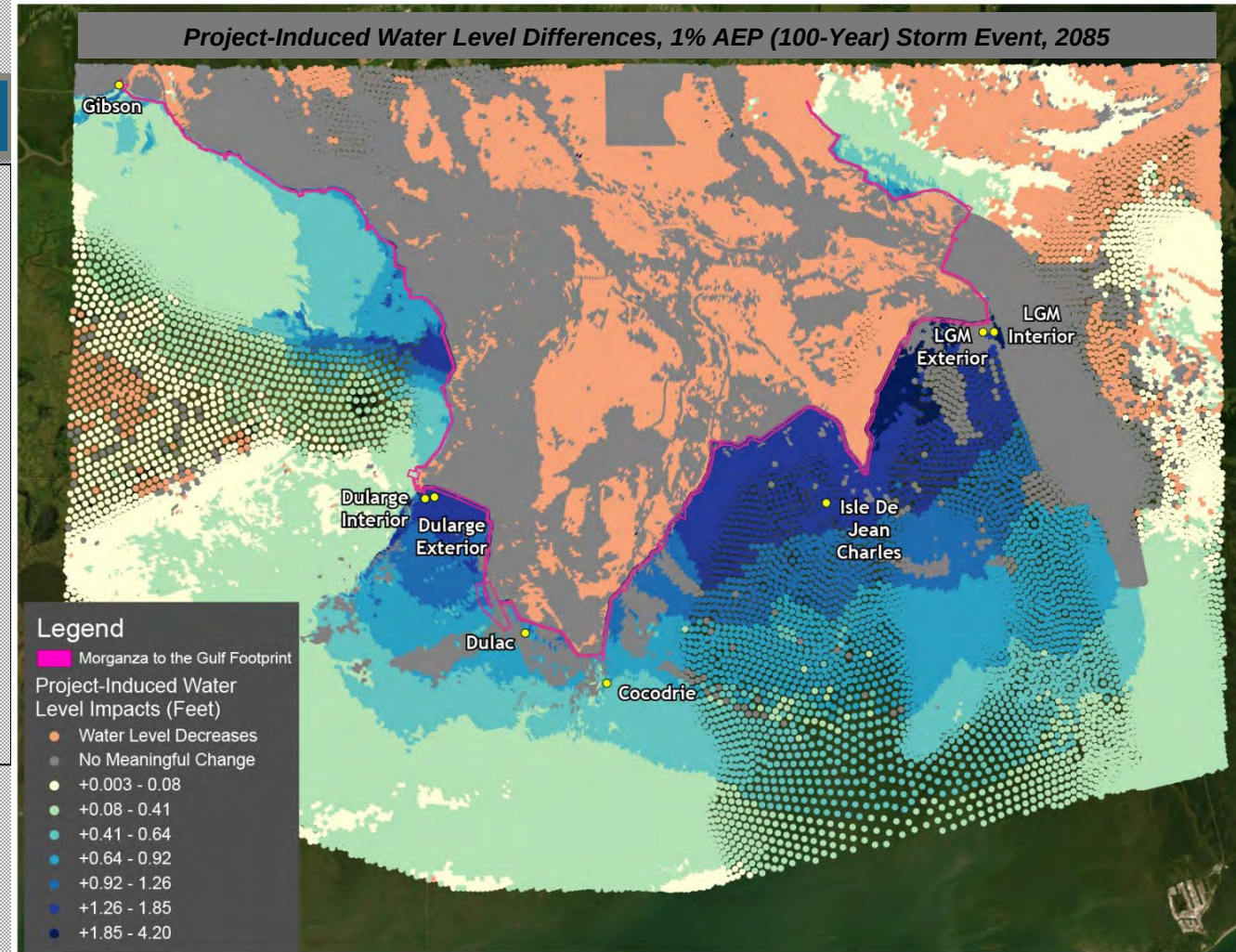
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PROJECT IMPACTS

Storm Surge/Project Increased Water Levels

- Proposed levee system would block storm surge and waves during storm events – up to and including 1% Annual Exceedance Probability (100-year) storms
- Water levels would be reduced inside the project
- Water levels on the outside of the project is expected to temporarily increase for 12 - 48 hours during and immediately following storm events.

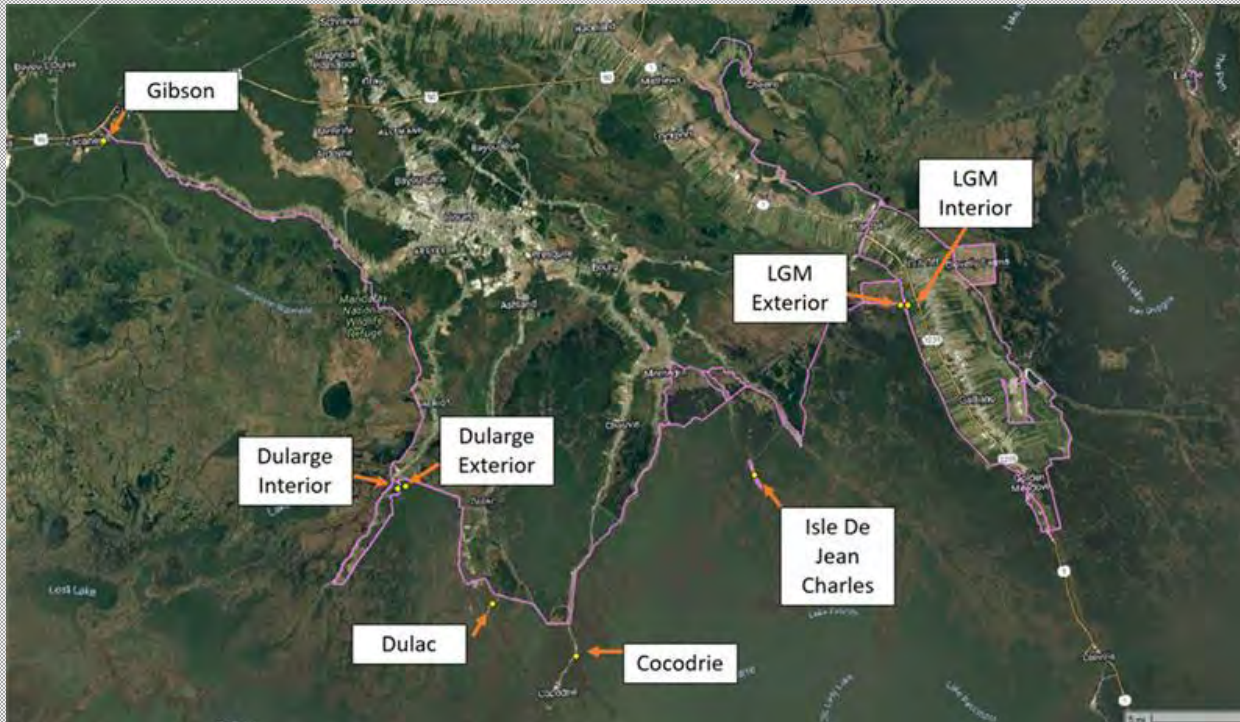


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PROJECT IMPACTS

Storm Surge/Project Increased Water Levels



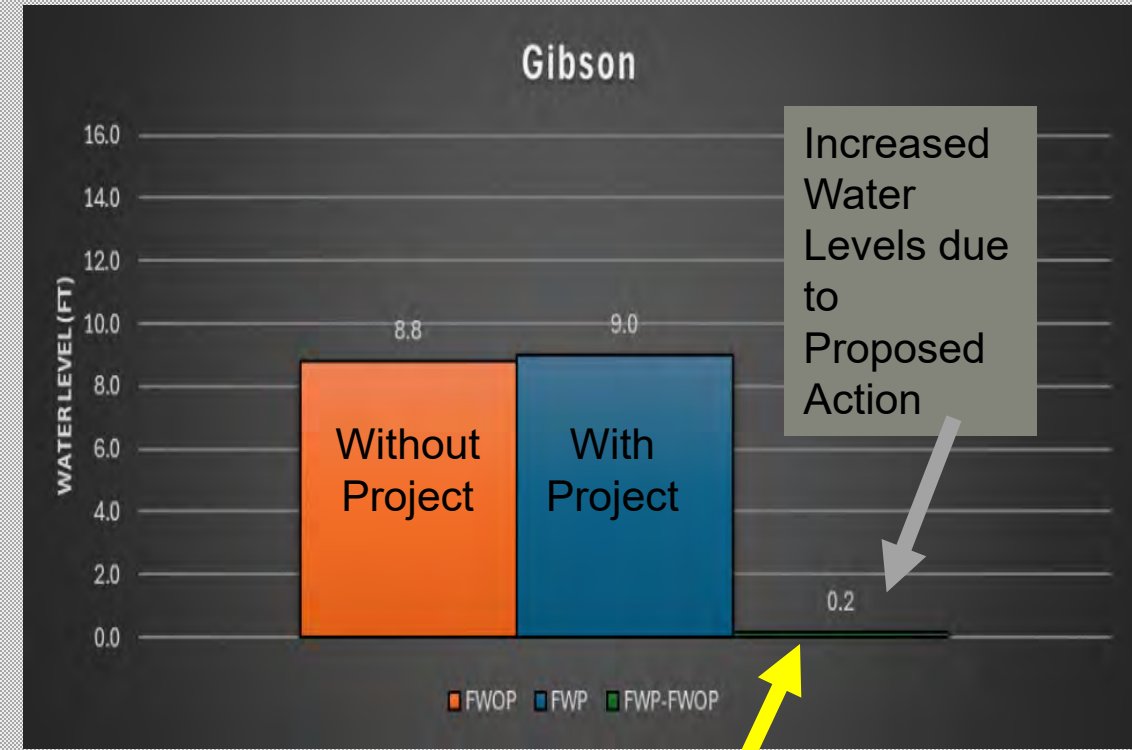
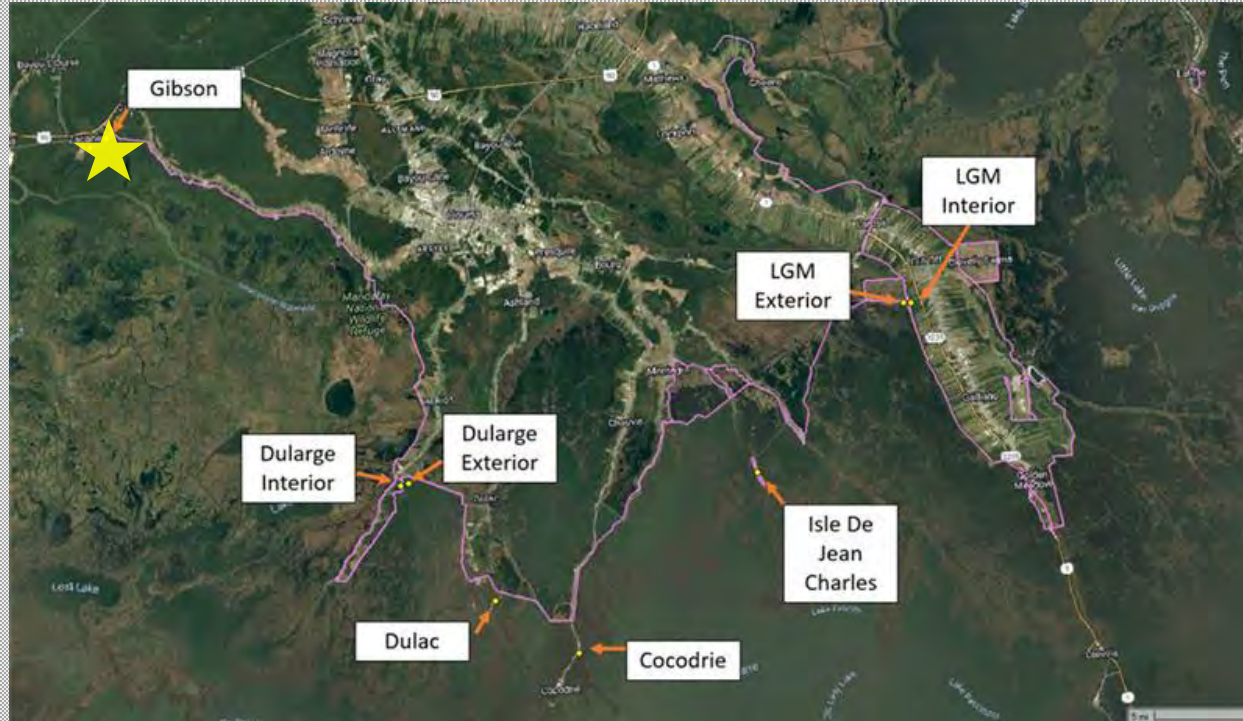
- Selected eight locations to assess FWP, FWOP, and differences in water levels
- Water levels in these locations are projected to be higher under the Proposed Action as compared to the No Action Alternative.
- Gibson is projected to have the lowest difference in water levels of +0.2 feet
- Larose to Golden Meadow Interior is projected to have the largest difference of +2.0 feet.



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PROJECT IMPACTS – PROJECTED CHANGES TO WATER LEVELS



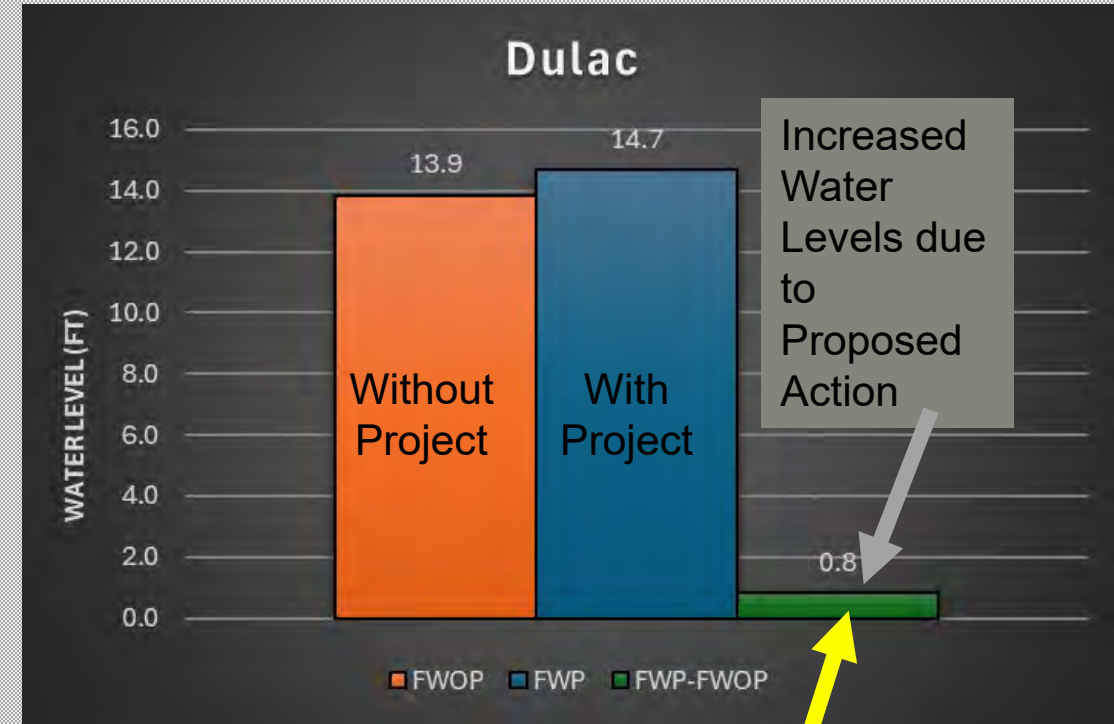
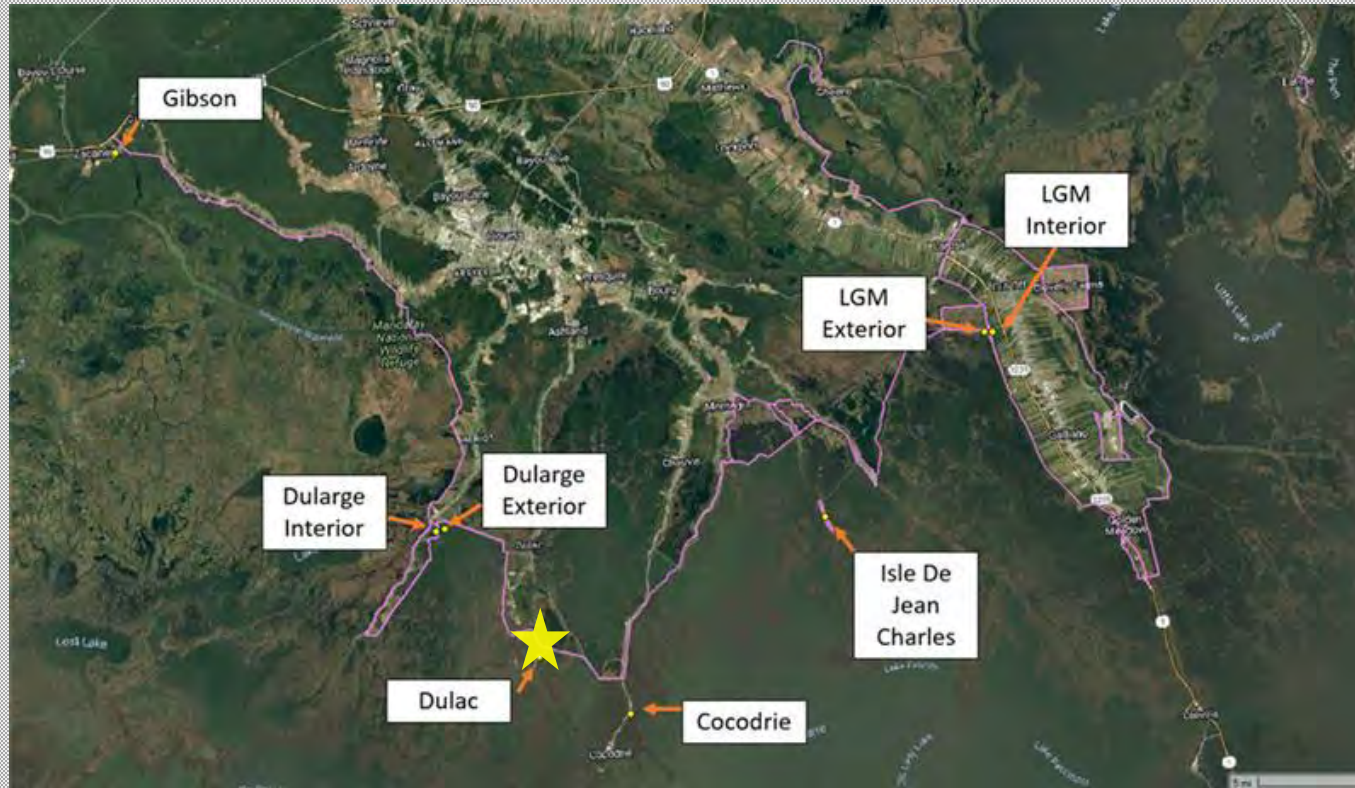
In **Gibson**, the project would cause a temporary increase of **0.2 foot** in water levels for 12-48 hours during/immediately following 100-year (1% AEP) storm events



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PROJECT IMPACTS – PROJECTED CHANGES TO WATER LEVELS



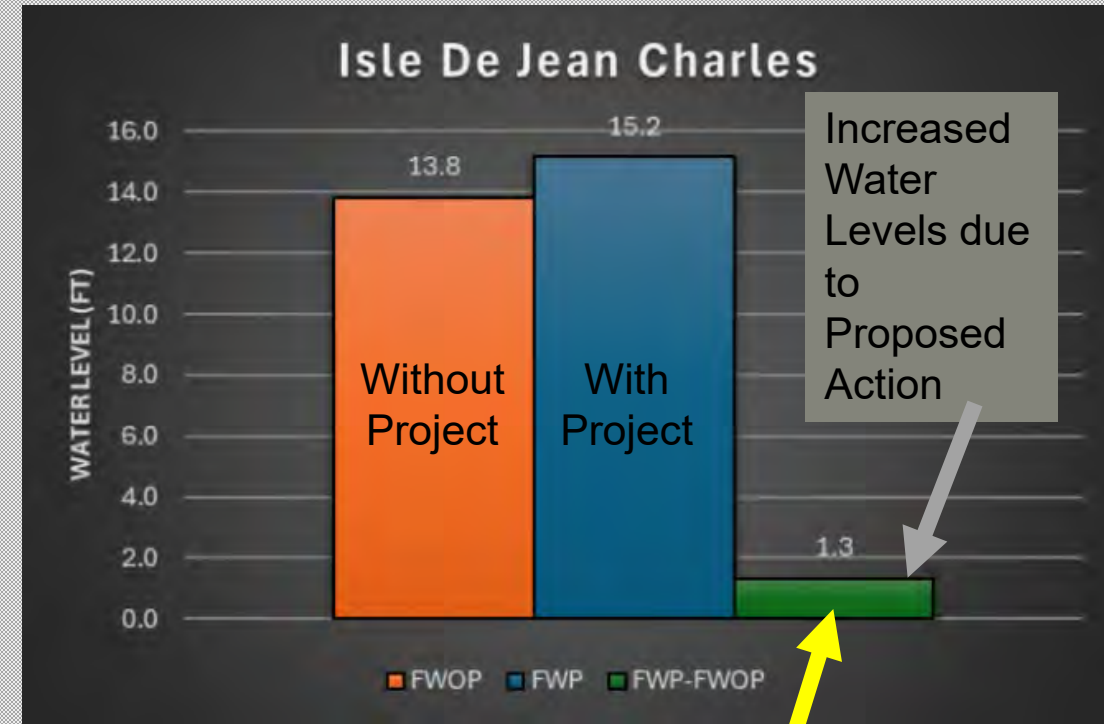
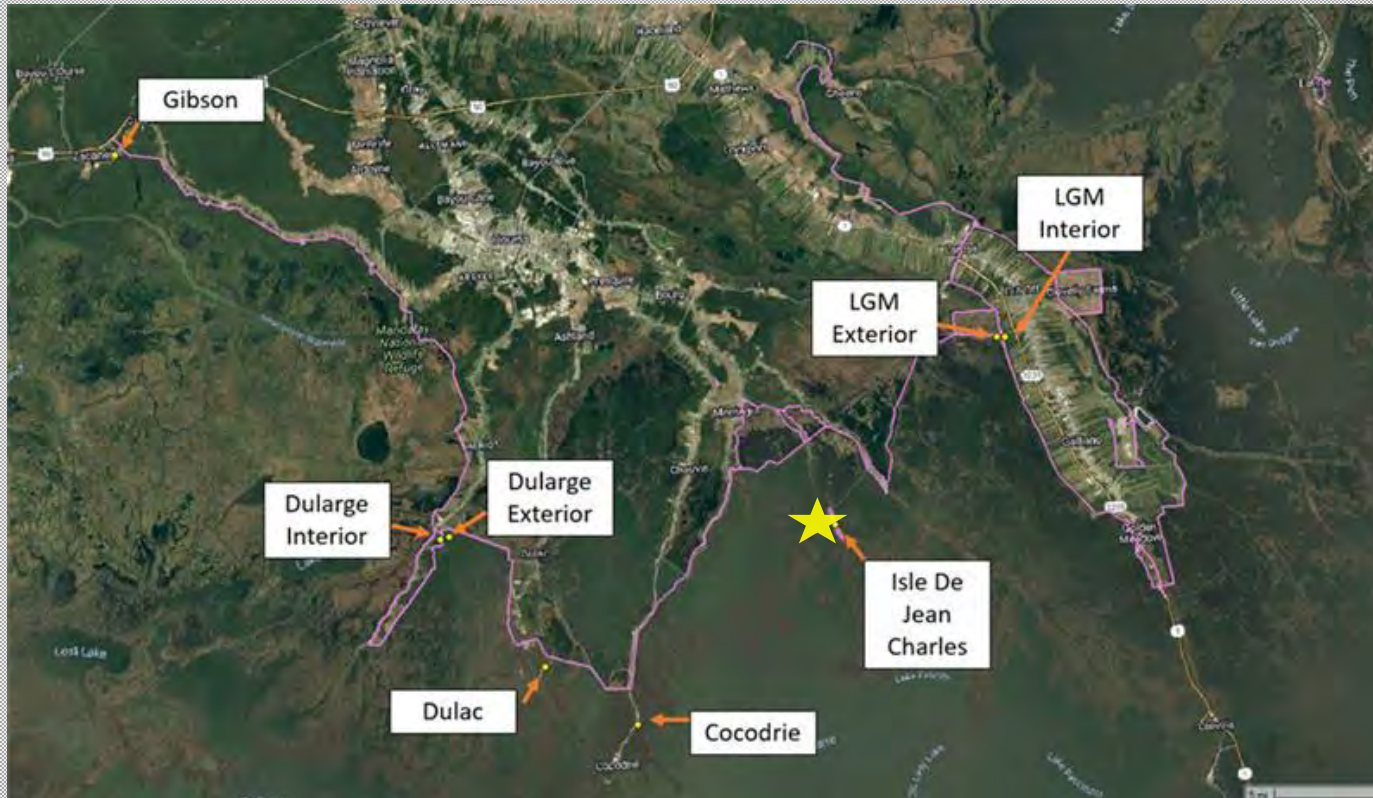
In **Dulac**, the project would cause a temporary increase of **0.8 foot** in water levels for 12-48 hours during/immediately following 100-year (1% AEP) storm events



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PROJECT IMPACTS – PROJECTED CHANGES TO WATER LEVELS



In **Isle De Jean Charles**, the project would cause a temporary increase of **1.3 foot** in water levels for 12-48 hours during/immediately following 100-year (1% AEP) storm events



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PROJECT IMPACTS

Storm Surge/Flooding Impacts

- In the communities on the outside of the project levee system would increase water levels by:
 - 1 millimeter (0.003 foot) at 752 structures (see Table 1)
 - 6 inches or more at 488 structures (see Table 2)
- Impacts would be limited to 12 – 48 hours during and immediately following 1% AEP (100-year) storm events (year 2085 sea-level change conditions).
- Project-induced flooding impacts (difference between No Action and Action Alternatives) would be less substantial during less severe, more frequent flood events.

Table 1

Water Level Increases of 1 Millimeter

Occupancy Type	Number of Structures Impacted
Single-family Residential	496
Multi-Family Residential	1
Mobile Home	114
Public	15
Warehouse	118
Retail	2
Professional	4
Grocery	1
Restaurant	1
Total	752

Table 2

Water Level Increases of 6 Inches or More

Occupancy Type	Number of Structures Impacted
Single-family Residential	344
Multi-Family Residential	1
Mobile Home	76
Public	8
Warehouse	58
Retail	1
Total	488



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PROJECT IMPACTS

Storm Surge/Flooding Impacts

- Mitigation implementation (as appropriate) for induced flooding impacts would be completed prior to construction.
- The U.S. Constitution's Fifth Amendment states that private property cannot be taken for public use without just compensation.
- Engineering-based mitigation measures could include (but would not be limited to) the following, all of which would require further NEPA evaluation:
 - Levees
 - Additional culverts, gravity outlets, and/or environmental control structures
 - Drainage canals
 - Ponding areas
 - Pumps
- Non-engineering-based measures could include (but would not be limited to):
 - Acquisition of easements; and/or
 - Acquisition of fee interests.



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PROJECT IMPACTS

Significant Habitat

- Direct impacts: 4,574 acres (1,365 average annual habitat units (AAHUs)) of bottomland hardwoods (BLH), swamp, and marshes would be lost during construction.
- Long-term, indirect impacts due to hydrologic shifts: Up to **1,059 acres** of BLH, swamp, and marshes. WVAs will be completed to quantify AAHUs and included in the Final SEIS.
- Habitat impacts would be **fully compensated** before or concurrent with Proposed Action construction.

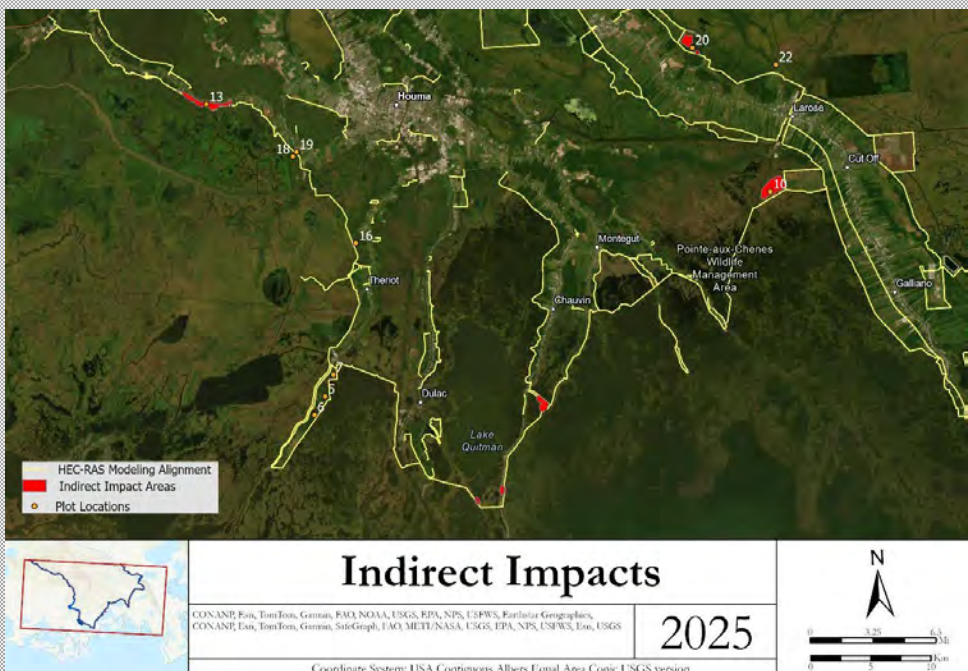
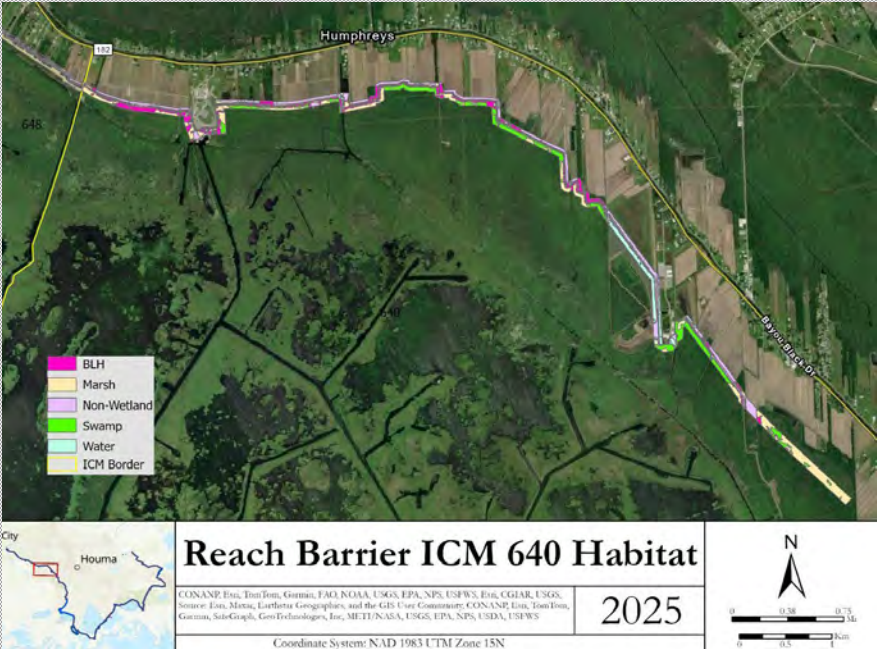
Table 6-5. Wetlands Lost within the Proposed Action Construction Footprint

Wetland Habitat Classification	Acres	AAHUs
BLH	324	-147.3
Swamp	178	-120.4
Fresh/Intermediate Marsh	1,516	-421.6
Brackish marsh	379	-55.8
Saline Marsh	2,177	-620.2
Total	4,574	-1365.3

Note: The numbers in this table have been rounded for presentation purposes. As a result, the totals may not reflect the sum of the addends.

Table 6-8. Indirect Impacts to significant habitat.

Habitat	Acres
Forest (combination of BLH and Swamp)	179
Fresh Marsh	214
Intermediate Marsh	621
Brackish Marsh	23
Saline Marsh	22
Total Marsh	880
Total Habitat	1059



PROJECT IMPACTS

Threatened and Endangered Species

- USACE has determined that the project would **not likely adversely affect** the West Indian manatee, tricolored bat, eastern black rail, alligator snapping turtle, monarch butterfly, bald eagle, or colonial nesting water birds.
- The U.S. Fish and Wildlife Service has concurred with these findings.
- Informal consultation with National Marine Fisheries Service would be finalized prior to decision making.

Essential Fish Habitat

- The project would adversely impact estuarine marsh in the study area, which is essential fish habitat (EFH).
- The National Marine Fisheries Service is reviewing the project during the current public review period; their comments will be included in the Final SEIS and their recommendations and required mitigation would be implemented before or during construction.

Wildlife

- Habitat would be converted to uplands and project features; habitat mitigation sites would work to offset impacts.
- Birds, mammals, reptiles, and amphibians would relocate to other suitable habitat in the area.
- Non-mobile species would perish.



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PROJECT IMPACTS

Coastal Resources

- USACE is coordinating with the Louisiana Department of Conservation and Energy for a Coastal Zone Consistency Determination.
- This coordination and determination would be included in the Final SEIS.

Water Quality

- Clean Water Act Section 404(b)(1) analysis and public notice would be included in the Final SEIS.
- Clean Water Act Section 401 water quality certification would be completed prior to decision making.
- A Storm Water Pollution Prevention Plan and a Spill Prevention, Control, and Countermeasure plan would be implemented during construction.

Hazardous, Toxic, and Radioactive Waste (HTRW)

- Surveys and desktop analyses have not indicated HTRW concerns in the proposed project footprint.
- Phase 1 Environmental Site Assessments would be completed within 6 months prior to all phases of construction.
- Any HTRW concerns discovered would be relocated or avoided.



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PROJECT IMPACTS

Recreation/Public Lands

- The project would widen existing local levees that dissect the Point-Aux-Chenes WMA (in reaches J1, J2, J3, K, and L), which would reduce the contiguous hunting acres.
- LDWF manages the WMA and is a coordinating agency for this SEIS.
- The USACE is coordinating the proposed structure designs with LDWF to accommodate LDWF's operation of existing water control structures.

Farmland

The project would:

- Irrevocably remove approx. 1,102 acres of prime farmland in the construction footprint.
- Irrevocably utilize approx. 2,631 acres of prime farmland for borrow material, access routes, and staging areas.
- Provide storm surge and flood risk reduction benefits to farmland inside of the levees

Traffic and Navigation

- The project would have minor, temporary increases in navigation traffic during construction from water-based deliveries of construction material.
- Truck traffic would pass through residential areas throughout construction. Any impacts to roadway infrastructure would be repaired after construction is completed.
- Trucks may pass through school zones during speed-restricted time frames unless prohibited by local laws.



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PROJECT IMPACTS

Air and Noise

- The project would have temporary, adverse impacts on air and noise during construction due to the operation of heavy equipment and haul trucks.
- Best Management Practices would be implemented during construction to minimize dust and air emissions.
- Pile driving would be limited to day light hours.

Socioeconomics

- During construction, communities would be adversely impacted by increased truck traffic and air/noise emissions.
- Over the long-term, businesses, jobs, and community cohesion would benefit from reduced flooding impacts.

Cultural Resources

- The project may impact Tribal Lands and historic properties in the study area, but effects have not been fully determined due to the project's vast size.
- USACE is negotiating a Programmatic Agreement with the State Historic Preservation Office, Federally recognized Tribal Governments, and other stakeholders to avoid, minimize, and/or mitigate adverse effects.
- The Programmatic Agreement will be executed before a Record Of Decision is signed and construction initiated.



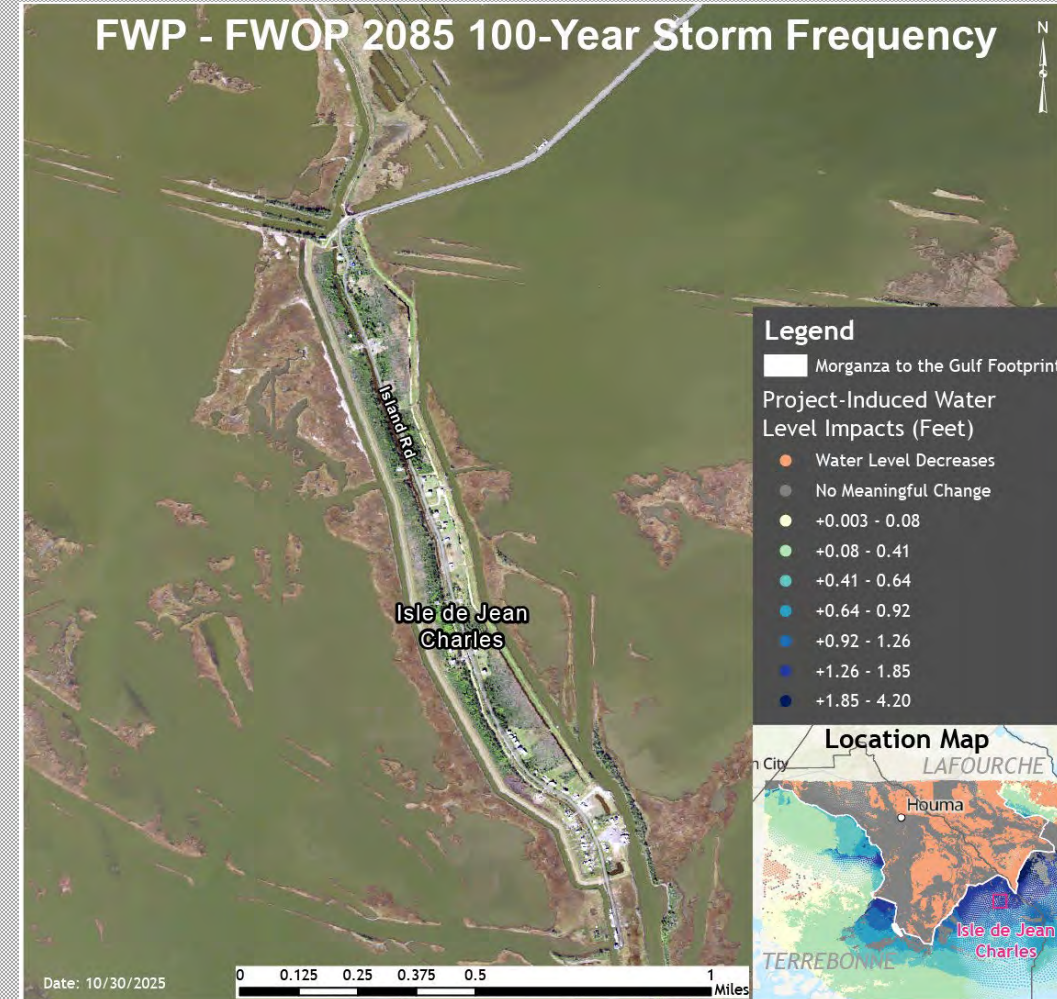
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PROJECT IMPACTS

Tribal Resources

- Five State-Designated Tribal Statistical Areas (SDTSA) are located within the project watershed: Bayou Lafourche, Grand Cailliou/Dulac/Isle de Jean Charles, Pointe-au-Chien, United Houma Nation
- Tribes have expressed concerns about construction truck traffic that would pass through the SDTSAs
- Isle de Jean Charles would be impacted by water level increases during storms, with water level increases of up to 1.3 feet during 1% AEP (100-year) storm events.
- Induced flooding mitigation would be implemented before construction



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TIMELINE: NEXT STEPS



Milestone	Date
Draft SEIS Public Review Ends	January 23, 2026
Final SEIS Review Period	August/September 2026



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SUBMIT YOUR COMMENTS

Comments accepted through January 23, 2026

5 Ways to Submit Comments on the DSEIS

1. Email: mvnenvironmental@usace.army.mil
2. Scan QR Code →
3. Court Reporter / Comment Card at Table
4. Mail:
Mr. Jason Emery; Chief, Environmental Planning Branch
U.S. Army Corps of Engineers
New Orleans District, CEMVN-PDS
7400 Leake Ave. New Orleans, LA 70118
5. Project Website:
<https://www.mvn.usace.army.mil/About/Projects/Morganza-to-the-Gulf/Documents>



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Part 6: Public Comments on Draft SEIS

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January 22, 2026

New Orleans District, U.S. Army Corps of Engineers
Attention: CEMVN-PDS
7400 Leake Avenue
New Orleans, LA 70118

Email: mvnenvrionmental@usace.army.mil

RE: Morganza to the Gulf, Louisiana
Hurricane and Storm Risk
Reduction Project

Gentlemen:

Please be advised that Apache Louisiana Minerals LLC (ALM) owns and manages over 270,000 acres of coastal land in Louisiana. We have reviewed the Draft Supplemental Environmental Impact Statement and respectfully **object** to any borrow sites and marsh creation areas proposed on Apache's fee title acreage without further discussion and collaboration with us. Specifically, borrow site A214 on page 7 of *Part 2: Map Series of Proposed Borrow Sites and Access Routes* and the Lake Mechant borrow site and marsh creation areas and borrow areas in the vicinity of Madison Bay and Lake Tambour on pages 6 & 7 of *Part 3: Map Series of Proposed Habitat Mitigation Sites* (maps attached). It is disheartening to only learn of the proposed work planned on Apache's acreage through the public comment period without the benefit of providing any input in the preparation of this document.

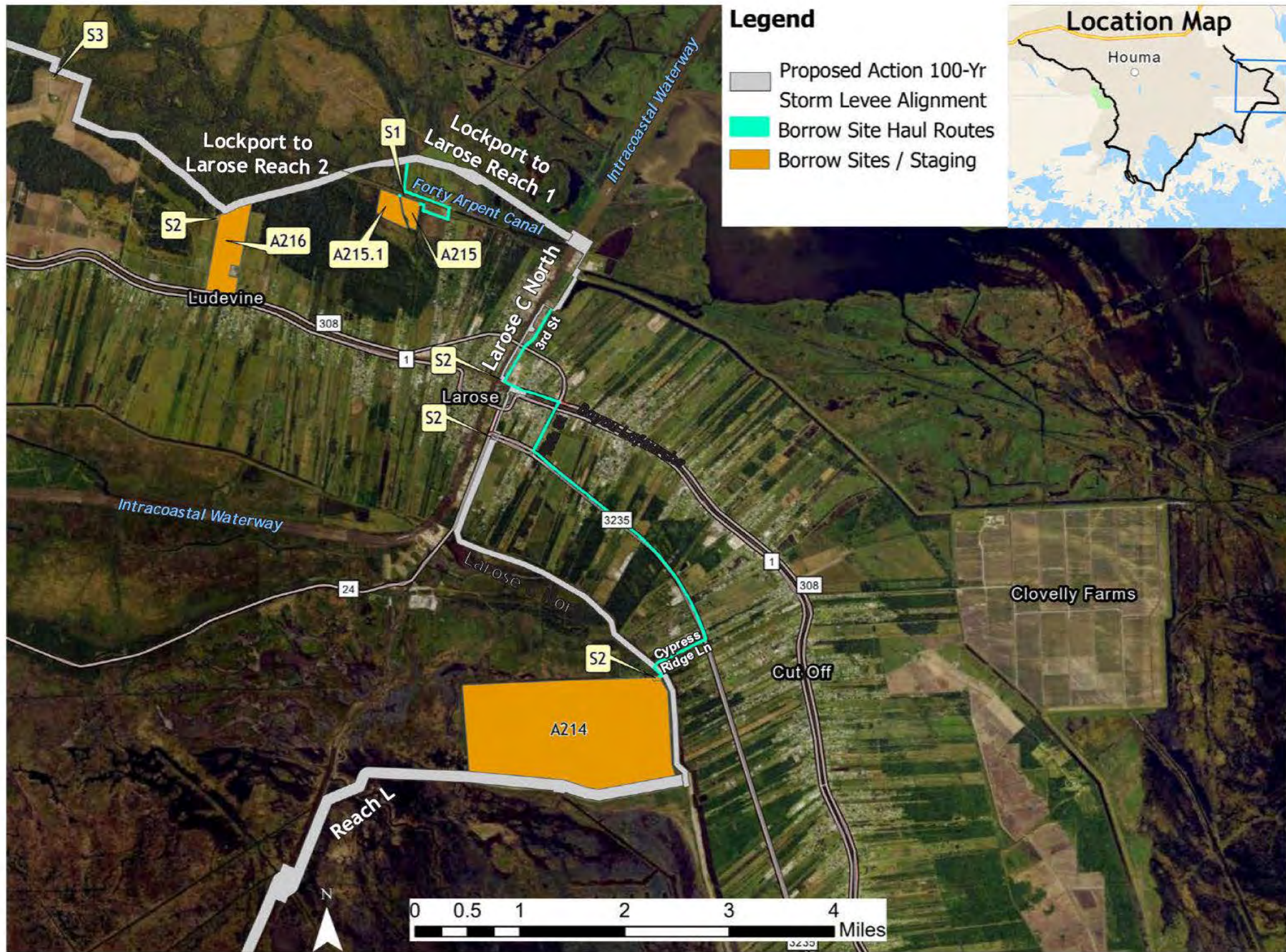
Please advise if you have any questions or need additional information.

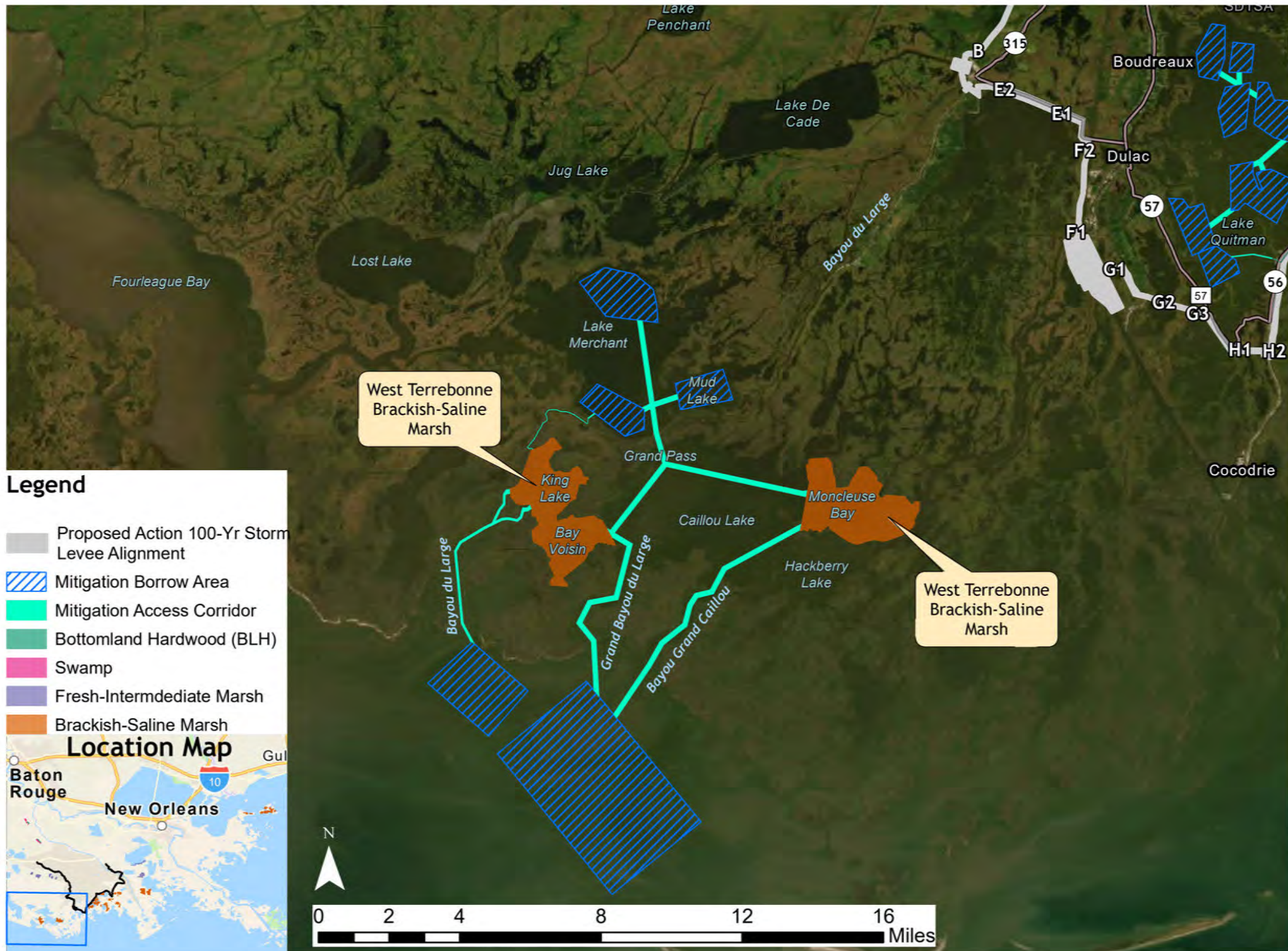
Sincerely,
APACHE LOUISIANA MINERALS LLC

A handwritten signature in black ink, appearing to read 'Timothy J. Allen', written over a horizontal line.

Timothy J. Allen, P.L.S.
General Manager

Map attachments (3)





West Terrebonne Brackish-Saline Marsh Mitigation Sites

From: noreply@dma.mil
To: [MVN Environmental](#)
Subject: New Orleans District Contact Form: Mitigation Plans
Date: Friday, January 23, 2026 5:27:47 PM

CAUTION: Your email client may display clickable links. The data in this email is provided without modification, as the user entered it. Before you click or use any link provided in this email, please confirm the authenticity of the link.

This message was sent from the New Orleans District website.

Message From: Jerrica Cheramie

Email: [REDACTED]

Phone:

Location (City, State, Zip):

Response requested: Yes

Message:

Mitigation projections do not include enough detail regarding mitigation to sites outside of the protection levee that will be impacted. This concern is one that must be addressed. Canal backfilling is a viable mitigation solution that should be considered to both add environmental protections and mitigate the impacts of this project.

MTG SEIS Comment

Ref Id: D5fwZ1ujOUOjkKPuN4lHeQ

From: noreply@dma.mil
To: [MVN Environmental](#)
Subject: New Orleans District Contact Form: Culturally Sacred Sites
Date: Friday, January 23, 2026 5:26:09 PM

CAUTION: Your email client may display clickable links. The data in this email is provided without modification, as the user entered it. Before you click or use any link provided in this email, please confirm the authenticity of the link.

This message was sent from the New Orleans District website.

Message From: Jerrica Cheramie

Email: [REDACTED]

Phone:

Location (City, State, Zip):

Response requested: Yes

Message:

Culturally historic sites have not been included in the protection or acknowledged as part of the planning process. Project maps do not acknowledge the existence of historical sites belonging to several Indigenous American tribes. The degradation of land outside of these levees will be exacerbated by the building of this project, which will threaten these sacred sites. These sites must be protected. The tribal communities from these areas are willing to engage with project managers to ensure that these sites are protected to the best of our ability.

MTG SEIS Comment

Ref Id: KTjRti9nMkKKkO8N7li8ug

From: noreply@dma.mil
To: [MVN Environmental](#)
Subject: New Orleans District Contact Form: State Recognized Tribal Collaboration.
Date: Friday, January 23, 2026 5:22:27 PM

CAUTION: Your email client may display clickable links. The data in this email is provided without modification, as the user entered it. Before you click or use any link provided in this email, please confirm the authenticity of the link.

This message was sent from the New Orleans District website.

Message From: Jerrica Cheramie

Email: [REDACTED]

Phone:

Location (City, State, Zip):

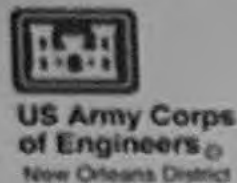
Response requested: Yes

Message:

The First People's Conservation Council represents several state recognized tribes. Coastal tribes, including The Bayou Lafourche Band of Biloxi-Chitimacha Indians, Isle de Jean Charles Choctaw Nation, Grand Caillou/Dulac Band of Biloxi-Chitimacha Choctaw, Grand Bayou Village of Atakapa-Ishak/Chawasha, and the Pointe-au-Chien Indian Tribe have both ancestral territory and current locations of communities that are largely excluded from the protections and have not been consulted regarding the impact to culturally and environmentally significant sites. The First People's Conservation Council is willing to act as a liaison to the tribes and requests that the Army Corps of Engineers engage in conversation concerning the impacts to our people.

MTG SEIS Comment

Ref Id: 6T7dc-9-p0CuU313kjNOHQ



Website



The purpose of today's public meeting is to present information and gather public comments for the Morganza to the Gulf, Louisiana Hurricane and Storm Damage Risk Reduction Project (MTG) Draft Supplemental Environmental Impact Statement (SEIS) released Dec. 5, 2025

Comment card

PLEASE WRITE LEGIBLY

Would you like to speak today? Yes ☒ No ☐

Comments: We need to make sure that we push for
projects that increase the growth of vegetation along the
levee to ensure the ~~leaves~~ levees survive future storms
and erosion from salt water

Some of the dumptrucks speed throughout their routes and no one knows
who owns them. A registry or liason would help.

Name Jesse Billiot

Affiliation _____

Street _____

Phone _____

City, St _____

E-mail _____

1 THE FOLLOWING ARE COMMENTS MADE DIRECTLY TO THE COURT REPORTER:

2 *****

3 JODY BILLIOT:

4 My main comment I wanted to give was that in
5 the, at the lower end of Point-aux-Chenes where
6 Bayou Point-aux-Chenes meets Cut Off Canal, there
7 is a large amount of current that flows through
8 that area and at times we measured that depth at
9 the intersection of that bayou to be about 45 feet
10 and the levee system sits not far from that canal.
11 It, it pretty much is the border for that canal.

12 Well, there is so much current flowing there
13 and it's constantly widening out that Jesse
14 Billiot and I were wondering if they might need
15 vegetation or some other structure there to
16

MORGANZA TO THE GULF, LOUISIANA HURRICANE AND STORM DAMAGE
Houma Public Meeting--USACE

Page 4

1 protect that levee, because if that canal --
2 there's so much water passing through if that
3 canal begins to widen more, it could begin to
4 undermine that levee and kind of weaken that whole
5 structure.

6 And I figure I'd bring it up because I don't
7 know how familiar people are with this area. But
8 that's pretty much my main comment.

9 (The meeting was concluded.)
10
11
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MORGANZA TO THE GULF, LOUISIANA HURRICANE AND STORM DAMAGE
Houma Public Meeting--USACE

Page 3

1 THE FOLLOWING ARE COMMENTS MADE DIRECTLY TO THE COURT

2 REPORTER:

3 *****

4 CONNIE BOURG:

5 About the borrow pits, they are digging them to
6 far down the bayou, because it looks like Swiss
7 cheese with all the borrow pits in the area that
8 they are trying to protect. So I think they need
9 to stop the borrow pits in the flood zones. I
10 think that would help. I know it's cheap dirt,
11 but it's going to come at a cost.

12 *****

MORGANZA TO THE GULF, LOUISIANA HURRICANE AND STORM DAMAGE
Thibodaux Public Meeting--USACE

Page 3

1 THE FOLLOWING ARE COMMENTS MADE DIRECTLY TO THE COURT

2 REPORTER:

3 *****

4 JAMES BRIEN:

5 Yes, my name is James Brien, Jr. I'm
6 commenting actually on Reach A. But, so we own
7 property, my family owns property located at 716
8 Bayou Dularge Road, Houma, Louisiana 7039- -- I'm
9 sorry 70363. The property has been in our family
10 for three generations and is currently in an LLC
11 called ALA-KTS Properties, LLC.

12 The parcel number is 39911 with the Terrebonne
13 Parish Assessor's Office. This parcel connects
14 with another parcel that's in the same LLC. It is
15 39930, which we own as well.

16 We have a recreational navigable canal that
17 runs through, that starts from the rear of parcel
18 39911 to access parcel 39930 to hunt and fish.
19 Reach A levee will cross parcel 39911 and without
20 a navigable operate, without an operational flood
21 gate to pass our small mud boats with, we would
22 not longer have access to our 129 acres on parcel
23 39930.

24 So requesting an operable flood gate at
25 municipal address 716 Bayou Dularge Road, Houma,



US Army Corps
of Engineers
New Orleans District

Website



The purpose of today's public meeting is to present information and gather public comments for the Morganza to the Gulf, Louisiana Hurricane and Storm Damage Risk Reduction Project (MTG) Draft Supplemental Environmental Impact Statement (SEIS) released Dec. 5, 2025

PLEASE WRITE LEGIBLY

Comment Card

Would you like to speak today? Yes ☐ No ☐

Comments: My fam. ly owns property @ 716 Bayou Dularge Road Houma, LA 70363
This property has been in our family for 3 generations and is currently in
an ALA-KTS Properties, LLC. The parcel # is 39911 and this parcel connects with
39930 which we own as well. We have a recreational navigable canal that runs from
the rear of Parcel 39911 to access parcel 39930 to hunt & fish. The reach A levee
will cross parcel 39911 and without an operable floodgate we will no longer have access
to our 129+ acres in parcel 39930. Requesting an operable floodgate @ 716 Bayou Dularge R
Houma,

Affiliation

ALA-KTS Properties, LLC.

Name

James Brien

Phone

E-mail

Street

City, St Zip



State of Louisiana

JEFF LANDRY
GOVERNOR

January 22, 2026

U.S. Army Corps of Engineers
Regional Planning and Environment Division, South
New Orleans Environmental Branch, CEMVN PDS
7400 Leake Avenue
New Orleans, LA 70118

Re: Morganza to the Gulf
Supplemental Environmental Impact Statement (SEIS) Comments

The Louisiana Coastal Protection and Restoration Authority (CPRA), a non-federal sponsor (NFS) for the Morganza to the Gulf Project, provides the below comments on the Draft SEIS. The comments also incorporate comments from the Terrebonne Levee & Conservation District, the other NFS for this project.

Should you have any questions or need additional information, please contact James McMenis at (225) 342-4662 or email him at James.McMenis@la.gov.

Sincerely,

Michael Hare

Executive Director
Louisiana Coastal Protection & Restoration Authority

cc: James McMenis, Project Management Administrator, CPRA
Elizabeth Davoli, Coastal Resources Scientist Manager, CPRA
Angela Hidalgo, Executive Director (TLCD)
Dwayne Bourgeois, Executive Director (NLLD)
Nicholas Matherne, Executive Director (SLLD)

National Environmental Policy Act (NEPA)

Per Chapters 1, 3, and 6 of the SEIS, supplemental NEPA/environmental compliance, if necessary, would be completed in the future if environmental conditions change as engineering and design is completed, compensatory wetland mitigation sites are refined, the mitigation measures are developed for induced flooding impacts, and if borrow sites other than those evaluated in the SEIS are required. Part 3.6 of the Department of Defense (DoD) NEPA Implementing Procedures dated June 30, 2025 specifically states supplements should only be prepared if DoD makes substantial changes to the proposed action that are relevant to environmental concerns or if there are substantial new circumstances or information about the significance of the adverse effects disclosed in the agency's NEPA/environmental document. We encourage USACE to find efficiencies where and when possible by relying on the analysis of this SEIS and tiering any future supplemental NEPA/environmental documents by incorporating the SEIS analysis per Part 3.5 of the DoD NEPA Implementing Procedures. The preparation of supplemental EISs (or other NEPA/environmental documents) takes time and additional funding authorizations to complete. If the need to supplement is triggered, but the proposed changes and new impacts are not significant, USACE should consider preparing an environmental assessment/finding of no significant impact (EA/FONSI), as outlined in Part 3.7 of the DoD NEPA Implementing Procedures.

However, it is unclear if this SEIS is programmatic in nature, and therefore, whether certain Project features will not be constructible upon approval of the Record of Decision (ROD), requiring additional NEPA/environmental documents to award construction. 42 U.S.C. 4336b authorizes a federal agency to rely on a programmatic environmental document after five years as long as the agency re-evaluates the analysis in a programmatic environmental document and its underlying assumptions to ensure reliance on the analysis remains valid. Part 3.1(b) of the DoD NEPA Implementing Procedures echoes this language. If required, USACE should state in this SEIS why it is appropriate to rely on the analysis in the Post-Authorization Change Report (PACR)/Revised Programmatic EIS (RPEIS), as supplemented by this SEIS, and make clear whether this SEIS is programmatic in nature. Finally, as engineering and design advances to bid the levee reaches that comprise the Proposed Action for construction awards, we encourage USACE to demonstrate that reliance on this SEIS is appropriate, per Part 3.2(b)(1) of the DoD NEPA Implementing Procedures.

No Action vs Proposed Action

Since signing of the ROD for the PACR/ RPEIS in 2013, the NFS has constructed 80 miles of levees for the Morganza to the Gulf system. As stated in Section 3.2 of this SEIS, the No Action Alternative "assumes continuation of existing conditions including the levees, floodgates, and environmental control structures constructed by the local entities prior to executing the PPA [Project Partnership Agreement] as the NFS for the federal project in 2021." More specifically, the Proposed Action described in Section 3.3 "would upgrade existing local levees and structures to provide a 1% AEP (100-year storm) level of risk reduction" and "construction or upgrading of 24 environmental control structures, 15 navigable floodgates, and a 2.5-mile floodwall along the GIWW in Larose."

We point out that some resource sections in Chapter 6 of this SEIS discuss the impacts of the No Action Alternative as if the NFS-constructed levees, environmental control structures, and floodgates, which

Morganza to the Gulf Project - SEIS Comments

January 22, 2026

Page 3

will continue to operate into the future, are not on the landscape. For example, the AdH modeling summary presented in Table 6-1 states that the existing condition (without project) in the model was limited to NFS-constructed features through 2015. The AdH modeling report in Appendix E states the with-project assumption is “the levee has been raised to the appropriate level and is impermeable.” This statement does not reflect the reality of the system to date by the NFS, which includes a total of 24 environmental control structures and 15 floodgates; the AdH model only included 10 culverts in the with-project condition. The Particle Tracking Model used AdH hydrodynamic output as the input. We are concerned neither of these models adequately projects aquatic impacts of the Proposed Action because none of the environmental control structures and floodgates constructed by the NFS after 2015 are included in the with-project condition in these two models to evaluate water transport into and out of the existing flood protection system.

Induced Flooding

USACE utilized several hydrologic and hydraulic models (i.e., ADCIRC, HEC-RAS, and CSTORM-MS) to evaluate induced flooding impacts to communities located inside and outside of the Morganza to the Gulf flood protection system, as well as impacts to the Larose to Golden Meadow flood protection system. All of the H&H models include the NFS-constructed levee reaches (existing condition) as well as the Proposed Action (levee lifts to achieve 1% AEP (100-year) protection in 2035 and 2085 as the Future With Project (FWP)). The ADCIRC model utilizes a dry depth threshold of 10.0 centimeters, a value two orders of magnitude larger than the 1.0 millimeter (1 mm) impact threshold depth in Chapter 6 of the Draft SEIS. The HEC-RAS models have published accuracy thresholds of 0.2 and 0.5 feet. Using a 1 mm threshold to define flooding impacts during any period of time, *let alone storm surge conditions*, is completely inappropriate. This is well below any actual measurable water surface elevation. One possible alternative would be to assess the impacts by determining how much longer the system may take to return to “normal” tidal levels. A tidally-impacted system is regularly subjected to inundation and a physically meaningful threshold could be derived to determine a time above MHHW (or some other regularly occurring datum) rather than an arbitrarily chosen vertical magnitude.

In the Draft SEIS Sections 6.2 (Hydrology, Including Storm Surge and Flooding) and 6.15 (Socioeconomics) the 1 mm threshold was arbitrarily applied to analyze project-induced (Future with Project) flooding impacts. The majority of land cover identified in Table 6-3 impacted by project-induced water-level increases of 1 mm (1% AEP in 2085) is herbaceous and woody wetlands (a combined total of 477,486 acres) followed by developed (low, medium, or high intensity, a combined total of 4,616 acres) and sugarcane (2,296 acres). This 1 mm threshold is then applied to identify impacts to 752 residential and commercial structures outside of flood protection during 1% AEP (100-year) storm events. The 1 mm threshold is not a model result and none of the H&H models used in USACE’s analysis has a level of accuracy this precise. If the Proposed Action impact from induced flooding is 1 mm during 1% AEP (100-year) storms, then the impact of the Proposed Action cannot be differentiated from the existing conditions as discussed in Affected Environment since the H&H models incorporate the NFS-constructed levee reaches.

USACE would not develop mitigation measures for induced flooding in communities outside of flood protection until the final design phase and the NFS would be responsible for acquiring real property

Morganza to the Gulf Project - SEIS Comments

January 22, 2026

Page 4

interests to implement such mitigation measures. As levee reaches analyzed in the Proposed Action in this SEIS would be implemented as authorized funding becomes available, CPRA is concerned there could be a lack of consistency in mitigation measures for the entire Proposed Action and, as a result, a greater financial burden to the NFS due to the arbitrary 1 mm threshold.

Section 6.2.1.1.1 presents information on storm surge flooding for 2085 under the No Action Alternative. Results of the CSTORM-MS model state that “the interior of the NFS levee system is projected to be inundated with 8 to 12 feet of water” under a 1% AEP (100-year) storm event in 2085. CPRA recommends that the Final SEIS include a discussion of 2035 model results for the No Action 1% AEP (100-year) storm event in order for the public to understand the impacts of tropical storms/hurricanes that are caused by delays resulting from lack of funding authorizations to implement the elevation lifts of the Proposed Action.

Wetland Impacts and Indirect Impacts

The footprints of existing NFS-constructed levees will be increased in order to construct elevation lifts under the federalization of the Morganza to the Gulf project. Section 6.3.2 of the SEIS states, “[t]he acreages listed in Tables 6-5 through 6-7 are based on the current level of design for project features and are likely larger than the right-of-way that would be acquired based on final designs” and [t]hese acreages would be adjusted during final design of each feature once the actual footprint of wetland impact is known and adjustments to mitigation features made as necessary to ensure full satisfaction of the compensatory mitigation requirement.” In order to understand the direct wetland impacts of the federal project, CPRA requests USACE provide the delta of the proposed federal footprints as compared to the existing levee footprints. Operations and maintenance (O&M) of compensatory wetland mitigation sites is a NFS responsibility and over-estimation of direct wetland impacts from construction of the proposed federal project and requiring compensatory mitigation increases NFS costs.

It is also unclear if the direct wetland impacts stated in the SEIS align with the *Sackett* decision. Wetlands on the protected side of the Morganza to the Gulf system without a continuous surface connection to jurisdictional waters of the United States should not be subject to jurisdiction under Section 404 of the Clean Water Act and, in those instances, construction impacts should not require compensatory mitigation. Without a delineation of jurisdictional wetlands in the Proposed Action footprint, the direct impacts may be overestimated, resulting in increased costs to the NFS.

Under Part 2.3(a) of the DoD NEPA Implementing Procedures an EIS should include reasonably foreseeable environmental effects of the proposed action; under Part 2.3(b) the analysis of environmental effects must demonstrate where and how a reasonable and manageable line relating to the consideration of any environmental effects from the action or project at hand may materialize later in time. Wetland Value Assessments (WVAs) for the evaluation of indirect impacts to wetlands are not complete/included in the SEIS. However, indirect wetland impacts are included in the habitat acreage impacts and calculated in AAHUs presented in the SEIS and the Mitigation Plan in Appendix C. In section 6.3.2.2.2 of the SEIS, it’s stated that “[o]verall, the project is expected to cause only negligible to minor changes in salinity, which in turn would have negligible to minor effects on marsh vegetation in the study area.” Negligible to minor impacts do not rise to a level of significance that warrant compensatory

mitigation for the projected indirect impacts to marsh habitat. We are concerned that the indirect impacts analysis may not account for the operation of the Morganza to the Gulf project constructed by the NFS prior to execution of the PPA in December 2021.

The U.S. Fish and Wildlife Service (USFWS) recommends in the Fish and Wildlife Coordination Act Report that USACE continue to coordinate on indirect wetland impacts. CPRA requests to be included in any coordination discussions between USACE and USFWS regarding WVAs and indirect wetland impacts of the proposed action alternative.

Compensatory Wetland Mitigation

CPRA recommends the use of its Master Plan wetland restoration projects to fulfill compensatory wetland mitigation for the direct construction impacts from upgrading the existing levees and structures that comprise the Morganza to the Gulf Project

From: [MVN Environmental](#)
To: [Carnes, Laura M CTR \(USA\)](#)
Cc: [Smith, Patrick W CIV USARMY CEMVN \(USA\)](#)
Subject: FW: [Non-DoD Source] Comments on Morganza to the Gulf projects
Date: Wednesday, January 7, 2026 9:31:01 AM

From: Joseph Dean <jdean080445@gmail.com>
Sent: Tuesday, January 6, 2026 4:42 PM
To: MVN Environmental <MVNEnvironmental@usace.army.mil>; Roe, R Matthew (Matt) CIV USARMY CEMVN (USA) <Robin.M.Roe@usace.army.mil>
Subject: [Non-DoD Source] Comments on Morganza to the Gulf projects

To whom this needs to reach,

My name is Joseph Dean, I'm 30 years old , a two time high school drop out but I have my Hi-Set diploma. I was born and raised on Bayou DuLarge and surrounding bayous. What id like to know is who's bright idea it was to , compromise the structural integrity of the land we have left . What I mean by this is, who is the genius behind, taking the land , that we're trying to save, and dig these football field size pits , just to use that dirt and move it a few miles down the roads onto a levee? If the engineers of these projects knew anything about the power of water and what it does to land, don't you think they'd realize that hey, water is running harder at the bottom so the lands eroding away underneath us before that top portion breaks away and floats away. This is just one of my comments on the morganza to gulf projects. I have plenty more comments and solutions to these issues. If y'all would like to hear them, get in touch with me, but for now I got to make a living how I can on commercial shrimp boats.

Thanks and have a blessed day



REGION 6

DALLAS, TX 75270

January 23, 2026

Mr. Jason Emery
New Orleans District
U.S. Army Corps of Engineers
Attention: CEMVN-PDS
7400 Leake Avenue
New Orleans, Louisiana 70118
mvnenvironmental@usace.army.mil

RE: Morganza to the Gulf, Louisiana, Hurricane and Storm Damage Risk Reduction Project
Draft Supplemental Environmental Impact Statement

Dear Mr. Emery:

The U.S. Environmental Protection Agency has reviewed the U.S. Army Corps of Engineers Draft Supplemental Environmental Impact Statement for the Morganza to the Gulf, Louisiana, Hurricane and Storm Damage Risk Reduction Project. The EPA's review is provided pursuant to the National Environmental Policy Act and our NEPA review authority under Section 309 of the Clean Air Act.

The proposed action is a hurricane and storm damage risk reduction project involving a 98-mile alignment of earthen levees, floodgates, environmental water control structures, road gates, and fronting protection for existing pump stations in Terrebonne and Lafourche Parishes, Louisiana. The purpose of the project is to reduce the risk of damage caused by hurricane storm surges.

EPA appreciates the opportunity to review this project and looks forward to continued participation in the NEPA process. If you have any questions, please contact me at (214) 665-8565, or contact Kimeka Price, Lead Reviewer for this project, at (214) 665-7483 or price.kimeka@epa.gov.

Sincerely,

**ROBERT
HOUSTON**

Digitally signed by
ROBERT HOUSTON
Date: 2026.01.23
09:08:56 -06'00'

Robert Houston
Acting Branch Manager
Environmental Review Branch

Enclosure: EPA's Detailed Draft Supplemental EIS Comments

**EPA's Detailed Draft Supplemental EIS Comments
for the proposed
Morganza to the Gulf, Louisiana, Hurricane and Storm Damage Risk Reduction Project**

National Pollution Discharge Elimination System

EPA recommends each entity associated with any of the project's proposed construction-related activities (including on-site and off-site construction support activities) review 40 CFR § 122.26(b)(14)(x), 40 CFR § 122.26(b)(15)(i), LAC 33:IX.2511.B.14.j, LAC 33:IX.2511.B.15, and the terms and conditions of Louisiana Department of Environmental Quality's latest effective Small Construction General Permit (LAR200000) or General Permit for Storm Water Discharges from Small Construction Activities (equal to or greater than 1 acre but less than 5 acres) and LDEQ's latest effective Large CGP (LAR100000) or General Permit for Storm Water Discharges from Construction Activities Five Acres or More. EPA is the National Pollutant Discharge Elimination System permitting authority for stormwater discharges within the State of Louisiana, on Indian country and lands of exclusive federal jurisdiction; therefore, EPA's CGP coverage would be required before any construction activities and covered on-site or off-site construction support activities commence.

Water Quality

There is no discussion about the impacts on local groundwater, particularly the Mississippi Alluvial Aquifer, which is the source of most reported groundwater withdrawals in Terrebonne Parish. EPA recommends the environmental document discuss the potential impacts from the planned excavation and any potential chemical leakage from machinery during the process, along with strategies for mitigating these impacts.

As discussed in Section 6.15.3, adverse effects on oyster seeding grounds in the project area will be avoided by dividing borrow lands into multiple cells. However, this does not address how the oyster propagation areas will be affected by other changes brought on by project construction, such as changes in turbidity, suspended solids, salinity, and surface water temperature. EPA recommends the environmental document describe what monitoring activities will take place before and after construction to make sure that these oyster propagation areas are successful and ecologically functioning.



FEDERAL EMERGENCY MANAGEMENT AGENCY
REGION VI
MITIGATION DIVISION

RE: Morganza to the Gulf, Louisiana, Hurricane and Storm Damage Risk Reduction
Project

NOTICE REVIEW/ENVIRONMENTAL CONSULTATION

☐ We have no comments to offer. ☒ We offer the following comments:

**WE WOULD REQUEST THAT THE COMMUNITY FLOODPLAIN
ADMINISTRATOR BE CONTACTED FOR THE REVIEW AND POSSIBLE PERMIT
REQUIREMENTS FOR THIS PROJECT. IF FEDERALLY FUNDED, WE WOULD
REQUEST PROJECT TO BE IN COMPLIANCE WITH EO11988 & EO 11990.**

County Contact:

Jerome Landry, Flood Plain Administrator
(504) 658-7130
jlandry@nola.gov

REVIEWER:

Charles Cook

Floodplain Management and Insurance Branch
Mitigation Division
Charles.Cook4@fema.dhs.gov
(940) 898-5400

DATE: January 27, 2026



United States Department of the Interior
OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
301 Dinosaur Trail
Santa Fe, NM 87508

4111

January 20, 2026

IN REPLY REFER TO:
ER 25/0590

Jason Emery
New Orleans District, U.S. Army Corps of Engineers
Leake Avenue New Orleans, LA 70118
Attention: CEMVN-PDS 7400

Subject: Draft Supplemental Environmental Impact Statement (DEIS) for the U.S. Army Corps of Engineers Proposed Morganza to the Gulf, Louisiana, Hurricane and Storm Damage Risk Reduction Project, Terrebonne and Lafourche Parishes, LA, DOD-USACE

Dear Jason Emery,

The Department of Interior (Department) has reviewed the Draft Supplemental Environmental Impact Statement (DEIS) for the Morganza to the Gulf, Louisiana, Hurricane and Storm Damage Risk Reduction project (MTG). That document, transmitted December 5, 2025, via electronic mail and letter, describes the U.S. Army Corps of Engineers' (USACE) proposed work. The objective of the MTG project is to reduce hurricane-related damages up to 100-year recurrent frequency storm events in the Louisiana coastal area between the cities of Lockport and Gibson. The project features are described in the 2013 Final Post Authorization Change Report (PACR) and Revised Programmatic Environmental Impact Statement (RPEIS) dated May 2013. The project consists of the construction of 98 miles of levees and associated floodgates, etc., in the Terrebonne Basin. The proposed action assessed in this DEIS comprises only 86 miles of the MTG project and associated direct and indirect impacts. Approximately 77.6 miles of the proposed levees would overlay existing hydrologic barriers such as natural ridges, roadbeds, and existing levees.

U.S. Fish and Wildlife Service (Service) Comments

The Service offers the following comments under the authority of the Fish and Wildlife Coordination Act (FWCA) (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.) and the National Environmental Policy Act of 1969 (NEPA) (83 Stat. 852, as amended; 42 U.S.C. 4321- 4347).

General Comments

The DSEIS provides a good description of fish and wildlife resources in the project area and project impacts on those resources. Wetlands in the project area provide important habitat for several Federal trust species. A draft FWCA report submitted to the USACE on November 4,

2025, transmitted the Service's evaluation of the project, project area, and impacts of the proposed project on fish and wildlife resources, including migratory birds (e.g., wading birds, neotropical migrants, waterfowl), candidate, proposed, and listed species, and other at-risk species that could occur in the project area. Additionally, the Service's report provided recommendations to avoid or reduce impacts and quantified those impacts that the USACE determined could not be avoided. Impacts due to the features of the project were assessed. The wetland value assessment (WVA) included in the FWCA report found that the proposed project would directly impact approximately 2,177 acres (-620.2 Average Annual Habitat Units [AAHUs]) of saline marsh; 464 acres (-88.3 AAHUs) of brackish marsh; 1,516 acres (-421.6 AAHUs) of fresh/intermediate marsh; 324 acres (-147.3 AAHUs) of bottomland hardwood forest (BLH); and 178 acres (-120.4 AAHUs) of swamp. The USACE has indicated in the DSEIS that mitigation for all impacts would be implemented.

The USACE concurred with 19 of 27 Service recommendations in the FWCA report and provided further detail for the other eight recommendations. The Service provides these responses to recommendations for which the USACE has not concurred and offers further comments.

For recommendation number 1 regarding avoiding, minimizing, and "in-kind" mitigation for habitat losses due to implementation of the project, the USACE concurred. The Service further recommends that "in-kind" apply to hydrology as it relates to existing levee systems. For example, mitigation for impacted flood side forest should be located outside of any levee system.

For recommendation number 5 regarding maintaining existing freshwater flows to the project area from the Atchafalaya River via the GIWW, the USACE referred to the draft water control plan which would specify when structures such as the GIWW West floodgate would be closed. Generally, floodgates on the GIWW would only be closed when water surface elevations at the structure reach 3.0 feet (ft) North American Vertical Datum of 1988 (NAVD88), which would happen with 2-year and 5-year annual exceedance probabilities. The Services agrees with the USACE's response.

For recommendation number 6 regarding GIWW Floodgate sluice gates being kept open except in the event of a tropical storm, the USACE again referred to the same draft water control plan as for recommendation number 5. In that draft water control plan, footnote 1 states that sluice gates associated with floodgates would remain open when floodgates are closed except for when closure conditions are reached.

For recommendation number 7 regarding potential modification of water control structure operations due to increasing sea level in the future, the USACE generally agrees with the Service and no further comments from the Service are required.

For recommendations number 8 and 14 regarding avoiding impacts to the Mandalay National Wildlife Refuge (NWR) and other refuges, the USACE responded that the SEIS does not address construction of, and impacts from, Reach A where Mandalay NWR is located. The USACE also indicated that they would continue to look for opportunities to avoid impacting the refuge and

coordinate with the Service. Environmental evaluation and compliance for construction of reach A would be addressed in a separate forthcoming NEPA document and there is a mitigation plan to cover all impacts to significant habitats.

For recommendation number 17 regarding using soils removed prior to levee construction to create or restore emergent wetlands, the USACE indicated they would work with the Service to determine the feasibility of that action. The Service agrees with their response.

For recommendation number 19 regarding revegetation of disturbed areas, the USACE stated that they would generally allow natural revegetation to occur but also consider using native plant species. The Service agrees with their response

For recommendation number 23 regarding the concern that the new definition of the Waters of the United States could cause the redefinition of some wetlands as non-jurisdictional, the USACE stated that they would continue to work closely with the Service and would develop a supplemental NEPA document if necessary to address impacts beyond those disclosed in this DSEIS. The Service looks forward to working with the USACE in the future on this matter when further clarification may inform the fate of those wetlands in question.

Consistent with our November 20, 2025, concurrence with the USACE's determination that the activities proposed in MTG DSEIS are not likely to adversely affect any listed or proposed threatened or endangered species or their critical habitat, the Service maintains our concurrence with the USACE determination. No further Endangered Species Act consultation with the Service will be required for the proposed project unless there are changes in the scope or location of the project elements. The Service recommends that the USACE contact the Service regarding threatened and endangered species if the project has not been initiated within one year.

Specific Comments

Page viii, Wetland Impacts and throughout the document: The total acres and AAHUs of impacts does not match the values in the Service's 2025 draft FWCA report due to a small discrepancy in the brackish marsh amount between the two documents. The Service and the USACE will coordinate to rectify those values.

Page 15, Design Criteria Changes, 2nd paragraph: It appears that the word "reduced" should be "reduction".

Page 16, Design Criteria Changes, Table 1-1: There are no units for the levee design elevations.

Page 60, Compensatory Habitat Mitigation, Figure 4-1. NFS Proposed Mitigation Sites: There appears to be a graphical artifact showing red squarish polygons that are supposed to represent swamp/BLH habitat in areas that are marsh and would not be appropriate for swamp or BLH mitigation.

Page 83, Affected Environment, Marsh, paragraph 2: The word “sweet” should be changed to “suite”.

Page 230, Fish and Wildlife Coordination Act: The text of recommendation number 2 from the Service’s FWCA report was left out; only the USACE Response to that recommendation remains in the document.

The Department appreciates the opportunity to comment on this project. For matters related to the Service's comments, please coordinate with David Castellanos at (337) 291-3112.

I am submitting these comments for Rebecca Collins. If you have any questions for the Department or need assistance, please reach out Rebecca Collins via email at: rebecca_collins@ios.doi.gov or by phone at (720) 814-6167.

Sincerely,

Courtney Hoover (for Rebecca Collins)
Regional Environmental Officer
Office of Environmental Policy and Compliance

Cc:

USACE, CEMVN, New Orleans, LA: Patrick Smith at Patrick.W.Smith@usace.army.mil and
Laura Carnes at Laura.M.Carnes@usace.army.mil

NMFS, Baton Rouge, LA: Mr. Craig Gothreaux at craig.gothreaux@noaa.gov

LDCE (formerly LDENR), Baton Rouge, LA: Mr. Kyle Balkum at Kyle.Balkum2@la.gov

CPRA, Baton Rouge, LA: Mr. Michael Hare at michael.hare@la.GOV

EPA, New Orleans, La: Raul Gutierrez, at Gutierrez.Raul@epa.gov

LDWF, Baton Rouge, La: Michael Perot at MPerot@wlf.la.gov

MORGANZA TO THE GULF, LOUISIANA HURRICANE AND STORM DAMAGE
Thibodaux Public Meeting--USACE

Page 4

1 Louisiana.

2 *****

3 BRYAN HARANG:

4 I'm here for the comment period for the project
5 from, from the Morganza to the Gulf. Big ditch
6 with a little levee to pump. Okay. And I'm in
7 Assumption Parish. I'm a cane farmer. We have an
8 ongoing sugar cane farm that is used. And a
9 friend of mine sent me an e-mail and I'm in red,
10 pink. He said, Be careful, Bryan, the Corps has
11 you to mitigate. He said, they are going to come
12 plant trees in the cane field. He said, You are a
13 possible site. I'm like, I blew up. That is our
14 livelihood.

15 First of all, I don't know -- and I heard the
16 comment period ends on the 23rd of this month. I
17 don't know why I wasn't notified as a possible
18 site before. If my friend doesn't let me know
19 about this, I'm not here. I have no way to make
20 a comment. And then my fear is, no comment, no
21 problem, we going. And I don't know why the
22 landowners aren't notified that they can have a
23 possible site.

24 It is this an ongoing cane farm. Eight, seven
25 generation, my son is the eighth generation cane

1 farmer. And I don't know why a project that
2 involves Lafourche and Terrebonne Parish has to
3 come to Assumption to mitigate land.

4 Some people say, Well, you can sell it for
5 mitigation. They are going to pay -- I'm not
6 interested in selling it at all. I want to keep
7 it like it is at any price. I'm keeping it
8 farming. I'm not here to, just unnerving when I
9 find out that I could possibly be, the land can
10 be taken away. It could be almost half of my
11 farm. And it just kind of gets me a little
12 queazy.

13 But they were very nice and kind. And kind of
14 explained some things to me and that's why I am
15 here.



STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF THE SECRETARY

January 7, 2026

Laura Carnes
New Orleans Environmental Planning Branch, CEMVN-PDS
7400 Leake Avenue
New Orleans, LA 70118
mvnenvironmental@usace.army.mil

RE: 251210/1235

**Draft Supplemental Environmental Impact Statement (SEIS) for the Morganza to the Gulf, Louisiana,
Hurricane and Storm Damage Risk Reduction Project (MTG Project)
US Army Corps of Engineers Funding
Terrebonne and Lafourche Parishes**

Dear Ms. Carnes:

The Louisiana Department of Environmental Quality (LDEQ) has received your request for comments on the above referenced project.

After reviewing your request, the Department has no objections based on the information provided in your submittal. However, for your information, the following general comments have been included. Please be advised that if you should encounter a problem during the implementation of this project, you should immediately notify LDEQ's Single-Point-of-Contact (SPOC) at (225) 219-3640.

Please review all items below that may affect your project/s success:

1. Please take any necessary steps to obtain and/or update all necessary approvals and environmental permits regarding this proposed project.
2. **If the project concerns flood control in residential and business areas that modify infrastructure and/or drainage:**
 - a. **Modeling for areas of interest, as well as both upstream and downstream connecting waterways, is preferred to evaluate potential impacts of increased flow on up/downstream flooding, hydrology, and water quality**
 - b. **Channels proposed to be modified and neighboring upstream and downstream channels should be designed and sized with consideration of natural channel design methodologies and principles, as improper design can result in increased velocities and channel degradation (scouring), erosion, bank instability, and water quality degradation**
 - i. **Natural and formerly natural channels should be assessed using Watershed Assessment of River Stability and Sediment Supply (WARSSS) methodologies as appropriate, including the Bank Erosion Hazard Index (BEHI) and Bank Analysis Nonpoint Contribution of Sediment (BANCS).**
 - ii. **Increased stream velocities can jeopardize residential properties, pipelines, bridges, and other infrastructure, and may cause increased pollutant loads (e.g., sediment, metals, low oxygen levels) to waterways through channel(s) realignment and reestablishment of naturally vegetated banks, meanders, and original lengths and slopes for stabilization**



STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF THE SECRETARY

- iii. **Nature-based solutions should be considered to address these, and storm water issues, before entry to downstream waters**
 - (1) <https://watershed.la.gov/nature-based-solutions>
 - (2) <https://www.epa.gov/green-infrastructure/green-infrastructure-design-and-implementation>
- c. **Detention pond design and operating practices, including but not limited to high flow releases, can affect channels as described above**
- d. **Flood control projects should be evaluated in combination with other flood mitigation projects proposed or ongoing in the watershed**
- 3. **If the project involves bridge and/or lateral/inline structures (e.g., culverts, weirs, sluice/lift gates)**
 - a. **Design to allow water to flow freely at the structure without restrictions during all flow regimes to preserve the natural functions of the stream channels, maintain appropriate channel dimensions, and flow regimes**
 - i. **Consequences of improper design and maintenance can lead to debris build-up against structures restricting flow, leading to decreases in velocity, reaeration, and dissolved oxygen levels**
- 4. If your project results in a discharge to waters of the state, submittal of a Louisiana Pollutant Discharge Elimination System (LPDES) application may be necessary.
 - a. The applicant must follow regional/local permitting requirements for sewage and storm water management
- 5. If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its LPDES permit before accepting the additional wastewater.
- 6. All precautions should be observed to control nonpoint source pollution from construction activities. LDEQ has stormwater general permits for construction areas equal to or greater than one acre. It is recommended that you contact Debbie Bissett (Debbie.Bissett@la.gov) or Melissa Reboul (Melissa.Reboul@la.gov) with the LDEQ Water Permits Division at (225) 219-3590 to determine if your proposed project requires a permit.
- 7. If your project will include a sanitary wastewater treatment facility, a Sewage Sludge and Biosolids Use or Disposal Permit is required. An application form or Notice of Intent will need to be submitted if the sludge management practice includes preparing biosolids for land application or preparing sewage sludge to be hauled to a landfill. Additional information may be obtained on the LDEQ website at <https://deq.louisiana.gov/page/sewage-biosolids> or by contacting Ronda Burch with the LDEQ Water Permits Division at (225) 219- 3213 or Ronda.Burch@la.gov.
- 8. If any of the proposed work is located in wetlands or other areas subject to the jurisdiction of the U.S. Army Corps of Engineers, you should contact the Corps directly regarding permitting issues. If a Corps permit is required, part of the application process may involve a water quality certification from LDEQ.
- 9. All precautions should be observed to protect the groundwater of the region.
- 10. Please be advised that water softeners generate wastewaters that may require special limitations depending on local water quality considerations. Therefore if your water system improvements include water softeners, you are advised to contact the LDEQ Water Permits to determine if special water quality-based limitations will be necessary.



STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

OFFICE OF THE SECRETARY

11. Please refer to the following regulations as they may apply to your project: LAC 33:111.Chapter 28 (Lead-Based Paint Activities); LAC 33:111.Chapter 27 (Asbestos Training and Accreditation requirements); LAC 33:111.5151, Emission Standard for Asbestos (for any renovations or demolitions); and LAC 33:111.1305.Control of Fugitive Emissions (prevention of Particulate Matter from becoming airborne).
12. If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's Single-Point-of-Contact (SPOC) at (225) 219-3640 or SPOC@la.gov is required. Additionally, precautions should be taken to protect workers from these hazardous constituents.
13. If the project will involve the removal or disturbance of any soils which may have contaminant concentrations that exceed the Screening Option Standards established by the LDEQ Risk Evaluation/Corrective Action Program (RECAP) Regulation, these materials may be considered a waste and disposed of at a permitted facility, or might be managed as part of a Solid Waste Beneficial Use or Soil Reuse Plan in accordance with LAC 33:VII.Chapter 11. Alternately, a site-specific RECAP Evaluation might be conducted and submitted to the LDEQ.
14. The following comments are provided by the Underground Storage Tanks Division (USTD) and are in response to SOV No. 251210/1235:

A file review indicates the following Agency Interest (AI) Number is located in the vicinity of your project in Terrebonne Parish, LA, and has active underground storage tanks (USTs) on the properties:

AI No. 73298; Rajun Cajun Food Gas & Fried Chicken Inc.; 2921 Savanne Rd.

A file review indicates the following AI Numbers are located in the vicinity of your project in Terrebonne and Lafourche Parish, LA and at one time contained USTs on the properties that have been removed from the LDEQ database:

AI No. 76725; Tommy's Stop & Go Inc. #3; 1835 Bayou Dularge

AI No. 70880; Ivy's Exxon; 506 E Main St.

AI No. 70890; Calvin's Exxon; 501 W Main St

AI No. 68808; Orchard Inc.-Apple Inn of Larose-Apple Inn Cafe; 12436 Hwy. 1

If any underground storage tanks are encountered during the project, they must be in compliance with the regulations found in LAC 33:XI of the Environmental Regulatory Code. If any contaminated soil or groundwater is encountered, the findings should be reported to LDEQ.

- Please consider restoration of natural protection areas and compare those options to the new/proposed levee/control structures for potential costs, benefits, and ecological effects.
- Potential adverse impacts to water quality for each proposed project should be identified, listed, and understood. Knowledge of these impacts and current impairments can inform avoidance, management, and mitigation measures
 - According to the LDEQ 2024 Integrated Report and Water Quality Management Plan:
 - Water quality units within the full project footprint have existing water quality impairments, including but not limited to bacteria, oxygen, and sediment (turbidity and/or total dissolved solids)
 - Total maximum daily load pollution control allocations are also in effect



STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF THE SECRETARY

- Some water units have, or are directly connected to, the oyster propagation designated use; oyster growth and harvest for consumption should not be impacted
- Additional/specific information is available upon request
- Proposed work should not cause or contribute to impairment of water quality criteria or prohibit the support of designated uses for the water units in which the project(s) are located or any connecting water units.
- Control structures must :
 - Allow sufficient flow, tidal movement, and fish migration
 - Ensure natural flow is maintained until closure is necessary & quickly restored upon reopening
 - Not increase marsh loss on seaward side of newly developed control measures by modeling sediment loss/gain and taking appropriate actions.
- Best Management Practices (BMPs) are essential throughout each individual project, and at all levels, to minimize impacts to existing conditions in both affected and downstream waters. The following may worsen or promote new impairments:
 - Borrowing/excavation
 - Debris storage, uncontrolled windrows
 - Wetland disturbance/encroachment
 - Transportation on waterbodies (equipment, debris, waste) including temporary waterway access points and shallow water disturbance
 - Construction including activities both in and adjacent to water.
- Monitoring, reporting, and maintenance (including replanting) should be a part of all habitat restoration associated with these projects.
- It is the responsibility of the ACOE, partners, and all contractors and subcontractors to understand that maintaining the project footprint, adhering to plans, and upholding BMPs is necessary for healthy functioning of Louisiana waterbodies and may require hiring qualified personnel to directly assist and/or train staff in addressing concerns above.

Currently, the parishes of Terrebonne and Lafourche are classified as attainment with the National Ambient Air Quality Standards and have no general conformity determination obligations.

Please send all Solicitation of Views (SOVs) requests and questions to SOVs@la.gov.

For Air Planning & Assessment question/inquiries, please contact Chance Henderson at Chance.Henderson@la.gov.

For Water Planning & Assessment question/inquiries, please contact Kori Blitch at Kori.Blitch@la.gov.

For Remediation question/inquiries, please contact Keith Horn at Keith.Horn@la.gov.

For Underground Storage Tank questions/inquiries, please contact Chris Means at Chris.Means@la.gov.

Sincerely,

A handwritten signature in blue ink that reads "mcjimenez".

Marissa Jimenez
Environmental Scientist Manager
Louisiana Department of Environmental Quality
Office of the Secretary

JEFF LANDRY
GOVERNOR



TYLER M. BOSWORTH
SECRETARY

PO BOX 98000 | BATON ROUGE LA | 70898

January 22, 2026

Charles Reulet, Administrator
Louisiana Department Conservation and Energy
Office of Permitting and Compliance
P.O. Box 44487
Baton Rouge, LA 70804-4487

RE: *Application Number: C20250124*
Applicant: U. S. Army Corps of Engineers-New Orleans District
Notice Date: January 14, 2026

Dear Mr. Reulet:

The professional staff of the Louisiana Department of Wildlife and Fisheries (LDWF) has reviewed the above referenced notice. The following recommendations have been provided by the appropriate biologist(s):

For portions of the project within the Point Au Chenes Wildlife Management Area (WMA):

1. LDWF should be included and be a part of any stakeholder, governance or advisory team with responsibilities for project planning, operations, maintenance and monitoring.
2. Impacts to the WMA requiring compensatory mitigation shall be mitigated for on the WMA.
3. USACE shall coordinate with LDWF to finalize project features to ensure proper management capabilities and public access to the WMA and its roads, water control structures, etc.
4. Prior to any activities on the WMA, USACE, or their assigns shall contact LDWF WMA Program Manager Mr. Lance Campbell via email at ljcampbell@wlf.la.gov via phone at (337-735-8668).
 - a. All vehicle usage, equipment and access routes will require prior approval from LDWF.
 - b. No activities will be allowed within the WMA during hunting seasons unless specifically approved by LDWF.

For portions off the WMA:

Fisheries Habitat:

LDWF Fisheries has reviewed the Draft Fish and Wildlife Coordination Act Report for the Morganza to the Gulf of Mexico, LA (MTG) Project, Hurricane and Storm Damage Risk Reduction System, and concurs with the USFWS' positions and recommendations. LDWF Fisheries has reviewed the Draft Fish and Wildlife Coordination Act Report for the Morganza to the Gulf of Mexico, LA (MTG) Project, Hurricane and Storm Damage Risk Reduction System, and concurs with the USFWS' positions and recommendations. Due to the size and complexity of the project, LDWF Oyster Program will work with USACE during engineering and design phase to avoid or minimize impacts to oyster resources and habitats in areas designated as Public Oyster Seed Areas Grounds proposed as mitigation sites, or borrow locations for marsh mitigation.

Oyster Seed Grounds:

Due to the size and complexity of the project, USACE should consult the LDWF Oyster Program during the engineering and design phase to avoid or minimize all potential impacts to oyster resources and habitats in all areas designated as Public Oyster Seed Areas. LDWF will calculate the appropriate mitigation amounts owed for all unavoidable impacts to these areas based on the individual oyster water bottom assessments conducted during the engineering phase. For additional information regarding these required oyster surveys and mitigation amounts please contact Christy McDonough at cmcdonough@wlf.la.gov.

The Louisiana Department of Wildlife and Fisheries appreciates the opportunity to review and provide recommendations to you regarding this proposed activity. Please do not hesitate to contact LDWF Permits Coordinator Dave Butler at 504-286-4173 should you need further assistance.

Sincerely,



Michael Perot
Biologist Director

aw/cm/zc/cm

Importance: High

Ray,

Please amend our comments to include the WDP comments below.

Thanks,

Dave Butler

Permits Coordinator
Louisiana Department of Wildlife and Fisheries
2000 Quail Drive
Baton Rouge, LA 70808
(504) 286-4173 New Orleans Office
(225) 763-3595 Baton Rouge Office



From: Carolyn Michon <cmichon@wlf.la.gov>

Sent: Friday, January 23, 2026 2:57 PM

To: Dave Butler <dbutler@wlf.la.gov>

Subject: RE: C20250124- Consistency Application- Draft Supplemental SEIS for MTG, Louisiana, Hurricane & Storm Damage Risk Reduction Project- Lafourche & Terrebonne Parishes

Importance: High

WDP comments:

The Wildlife Diversity Program database indicates that the following at-risk species may occur within the project area:

West Indian Manatee (*Trichechus manatus*). The manatee is a large, aquatic 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 listed as federally **THREATENED** under the Endangered Species Act (16 U.S.C. 1531-1544) and as state **THREATENED** under L.A.C. 76: I.317. In addition, the species is protected under the federal Marine Mammal Protection Act (16 U.S.C. 1361-1407). 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., aquatic grass beds). Areas with aquatic grass beds should be avoided during project activities. Report all manatee sightings to the Louisiana Department of Wildlife and Fisheries at 1-800-442-2511.

Western Alligator Snapping Turtle (*Macrochelys temminckii*). This very large freshwater turtle is imperiled (S2) in Louisiana and is **PROPOSED THREATENED** by the USFWS. Minimize disturbance and alteration of nesting habitat, particularly during nesting season (April – June). Nesting typically occurs close to river banks and lake shores. Minimize removal of log jams in streams, as woody debris provides cover and hunting areas used by this species. Stream alteration should be avoided to protect turtle habitat. If dredging is needed, material should be dumped away from potential turtle nesting sites or dumped prior to egg laying (May – early June). Please contact Keri Lejeune at 337-735-8676 for more information.

Eastern Black Rail (*Laterallus jamaicensis jamaicensis*). This diminutive waterbird is included within a group of birds known as the secretive marsh birds due to the species' exceedingly cryptic behavior. The Eastern Black Rail (*L. j. jamaicensis*) is currently considered critically imperiled (S1) in Louisiana and is listed as federally **THREATENED** under the Endangered Species Act (16 U.S.C. 1531-1544). Because the species is so difficult to study, its distribution and status are difficult to fully ascertain. Based on limited, contemporary, field work in coastal Louisiana, as well as historical literature and museum specimens, the Black Rail can be found in Louisiana throughout the year; the species is a very rare breeder and a rare migrant/winter visitor. The Black Rail prefers high marsh habitat, possibly associated with Sea Ox-eye Daisy (*Borrchia frutescens*) and Gulf Cordgrass (*Spartina spartinae*). Please minimize disturbance and alteration to high marsh habitats.

Bald Eagle (*Haliaeetus leucocephalus*). This species is protected under the federal Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c) and the Migratory Bird Treaty Act (16 U.S.C. 703-712). All Bald Eagle nests (active, inactive, or seemingly abandoned) should be protected, and no large trees should be removed. No major activities should occur within the nesting period (September 1 – June 1). Please refer to the U.S. Fish and Wildlife Service Bald Eagle Monitoring Guidelines for more information on avoiding impacts to this species including suggested buffer distances: <https://www.fws.gov/media/bald-eagle-monitoring-guidelines-southeastern-us>

Waterbird Nesting Colony. Please be aware that entry into or disturbance of active breeding colonies is prohibited by the Louisiana Department of Wildlife and Fisheries (LDWF). In addition, LDWF prohibits work within a certain radius of an active nesting colony.

Nesting colonies can move from year to year, and no current information is available on the status of these colonies. If work for the proposed project will commence during the nesting season, conduct a field visit to the worksite to look for evidence of nesting colonies. This field visit should take place no more than two weeks before the project begins. If no nesting colonies are found within 1000 feet (2000 feet for Brown Pelicans) of the proposed project, no further consultation with LDWF will be necessary. If active nesting colonies are found within the previously stated distances of the proposed project, further consultation with LDWF will be required. In addition, colonies should be surveyed by a qualified biologist to document species present and the extent of colonies. Provide LDWF with a survey report (*.pdf, *.doc, *.docx, etc.) packet that includes the following information:

1. qualifications of survey personnel;
2. survey methodology including dates, site characteristics, and size of survey area;
3. species of birds present, activity, estimates of number of nests present, and general vegetation type including digital photographs representing the site;
4. print out(s) of site map(s) with topographic or imagery basemap; and
5. Google Earth *.kml or *.kmz file(s) or ArcGIS shapefile(s) projected in UTM NAD83 Zone 15 to illustrate the location and extent of the colonies.

Please e-mail survey reports to Carolyn Michon at cmichon@wlf.la.gov

To minimize disturbance to colonial nesting birds, the following restrictions on activity should be observed:

- For colonies containing nesting wading birds (e.g., herons, egrets, night-herons, ibis, Roseate Spoonbills) or Anhingas or cormorants, all project activity occurring within 1000 feet of an active nesting colony should be restricted to the non-nesting period (i.e., September 1 through February 15).

- For colonies containing nesting gulls, terns, or Black Skimmers, all project activity occurring within 650 feet (2000 feet for Brown Pelicans) of an active nesting colony should be restricted to the non-nesting period (i.e., September 16 through April 1).

If you have any questions or need additional information on birds, please contact Rob Dobbs at 337-735-8675.

No other impacts to rare, threatened or endangered species or critical habitats are anticipated from the proposed project. The Wildlife Diversity Program (WDP) reports summarize the existing information known at the time of the request regarding the location in question. WDP reports should not be considered final statements on the biological elements or areas being considered, nor should they be substituted for on-site surveys required for environmental assessments. If at any time WDP tracked species are encountered within the project area, please contact our biologist at 225-763-3554.



Carolyn Michon, Biologist

Louisiana Department of Wildlife and Fisheries

cmichon@wlf.la.gov

www.wlf.louisiana.gov

200 Dulles Drive

Lafayette, La 70506

337-735-8734



Website



The purpose of today's public meeting is to present information and gather public comments for the Morganza to the Gulf, Louisiana Hurricane and Storm Damage Risk Reduction Project (MTG) Draft Supplemental Environmental Impact Statement (SEIS) released Dec. 5, 2025

Comment card

PLEASE WRITE LEGIBLY

Would you like to speak today? Yes ☐ No ☐

Comments: I appreciate your hardwork on a huge plan. On your Socio-Economic impacts + Cultural + Wild life Impacts I worry about the impact on Lake Boudrovaux. It may be protected from storms by your project but to function as an ecosystem it needs a natural tidal cycle. If culverts are really left open it may work naturally, but right now tides come in ~~and~~ and out only 2 sites - one at West, one at East.

Name GARY LATOUR, PhD Affiliation Nicholls Biology
Street [REDACTED] Phone [REDACTED]
City, St Zip [REDACTED] E-mail [REDACTED]



Website



The purpose of today's public meeting is to present information and gather public comments for the Morganza to the Gulf, Louisiana Hurricane and Storm Damage Risk Reduction Project (MTG) Draft Supplemental Environmental Impact Statement (SEIS) released Dec. 5, 2025

Comment card

PLEASE WRITE LEGIBLY

Would you like to speak today? Yes ☐ No ☐

Comments: I appreciate your hard work on a huge project. I worry
about your "mitigation" of a cultural gem such as
IDJC. How does one "mitigate" the loss of cemeteries
and cultural homeland. Money does not equal the cultural integrity
of a people connected to a place.

Name Gary LaFleur, PhD Affiliation Nicholls Biology
Street [REDACTED] Phone [REDACTED]
City, St Zip [REDACTED] E-mail [REDACTED]



Website



The purpose of today's public meeting is to present information and gather public comments for the Morganza to the Gulf, Louisiana Hurricane and Storm Damage Risk Reduction Project (MTG) Draft Supplemental Environmental Impact Statement (SEIS) released Dec. 5, 2025

Comment card

PLEASE WRITE LEGIBLY

Would you like to speak today? Yes ☐ No ☐

Comments: I appreciate your hard work on a huge project. I worry about when you say you will impact Fresh + intermediate marsh + then "mitigate". If you impact floatant marsh - will you restore "floatant marsh" or marsh rooted in med. rooted marsh is not equal to "floatant marsh" + so you should attempt to REBUILD "Real floatant"

Name GARY LAFLUERE, PhD Affiliation

Nicholls Biology

Street

Phone

City, St Zi

E-mail



Website



The purpose of today's public meeting is to present information and gather public comments for the Morganza to the Gulf, Louisiana Hurricane and Storm Damage Risk Reduction Project (MTG) Draft Supplemental Environmental Impact Statement (SEIS) released Dec. 5, 2025

Comment card

PLEASE WRITE LEGIBLY

Would you like to speak today? Yes ☐ No ☐

Comments: I appreciate your efforts on this huge project. However some of your impacts will not just be to "tribe lands" where people live but to "Ancient Mounds" such as sites on Bayou Sale near Deep Soline Lake and just south of Pontchartrain Chenier. How do you mitigate "loss of a sacred site" that cannot be equaled with money or another mound. You could build ring levees around sacred sites similar to Fort Livingston - that would help.

Name GARY LATIMER PhD

Affiliation

Nicholls CTR for Bayou Studies

Street

Phone

City, St Zip

E-mail



US Army Corps
of Engineers
New Orleans District

Website



The purpose of today's public meeting is to present information and gather public comments for the Morganza to the Gulf, Louisiana Hurricane and Storm Damage Risk Reduction Project (MTG) Draft Supplemental Environmental Impact Statement (SEIS) released Dec. 5, 2025

Comment card

PLEASE WRITE LEGIBLY

Would you like to speak today? Yes ☒ No ☐

Comments: 1. How will you mitigate loss of floatant marsh?

2. Creating a levee at Lake Boudreaux may protect land and property, however the fishing community requires a natural tidal regime. Can you manage that property?

3. You have stated your impact on tribal lands but not on the ancient cultural gems represented by mounds; these should be protected with ring levees

Name GARY LAFLOR

Affiliation Nicholls Ctr for Bayou Studies

Street PO

Phone [REDACTED]

City, St Zip [REDACTED]

E-mail [REDACTED]



Website



The purpose of today's public meeting is to present information and gather public comments for the Morganza to the Gulf, Louisiana Hurricane and Storm Damage Risk Reduction Project (MTG) Draft Supplemental Environmental Impact Statement (SEIS) released Dec. 5, 2025

Comment card

PLEASE WRITE LEGIBLY

Would you like to speak today? Yes ☒ No ☐

Comments: 1. How will you mitigate loss of floatant marsh?

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Name GARY LAFLOR

Affiliation Nicholls Ctr for Bayou Studies

Street PO

Phone

City, St Zip

E-mail

MORGANZA TO THE GULF, LOUISIANA HURRICANE AND STORM DAMAGE
Thibodaux Public Meeting--USACE

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DR. GARY LAFLEUR:

Okay. My name is Gary LaFleur and I appreciate
the work the Army Corps of Engineers is doing.
But I had three things I felt obliged to talk
about.

One is the biology I work on which is the

1 flotaut. So I saw a slide that talked about
2 mitigating the loss of freshwater and intermediate
3 marsh. So if that gets damage, I'm glad the Army
4 Corps of Engineers is going to remediate that or
5 mitigate that.

6 But you like me know, it's really hard to
7 rebuild flotaut march. So how are you going to do
8 that? If you break up flotaut marsh making rooted
9 march and mud is not the same as creating flotaut
10 marsh to mitigate that loss.

11 And so I feel like, I don't know how to get
12 around that except maybe making more marsh, more
13 rooted marsh would equal flotaut marsh or maybe,
14 maybe funding some projects to study flotaut or
15 something like that.

16 Okay. Number two is I appreciate y'all putting
17 that levee south of Lake Boudreaux. That protects
18 Lake Boudreaux of course and it protects Chauvin
19 and I'm glad of that. But, Lake Boudreaux is a
20 place that's very important to the people of
21 Chauvin and Dulac, because commercial fishermen
22 and recreational fishermen depend on Lake
23 Boudreaux. And what I'm worried about is that the
24 levee may mess up the tidal fluctuation.

25 So in order for Lake Boudreaux to work the

1 right way with shrimp, the way it does, especially
2 brown shrimp, you know, the tides need to come in
3 and out in a way that is, mimics the way that's
4 it's been doing it for a hundred years.

5 Now, if y'all use those culverts and y'all
6 really leave those culverts open so that there is
7 water exchange between south of the levee and
8 north of the levee, I think that might help. But
9 I've seen a lot of places where there is culverts
10 and they use, for some reason they keep them
11 closed all the time.

12 I realize that might be the Levee District
13 making that decision, but I wanted to, I wanted
14 to share my worries with you about that. Because
15 Lake Boudreaux's tide is connected to the
16 socioeconomic, as well as the cultural connections
17 of Chauvin, not just an ecosystem.

18 And the last thing I wanted talk about was,
19 y'all mentioned tribal lands and I appreciate that
20 y'all at least recognized, the State recognized
21 tribes. Y'all did a good job of saying that. But
22 besides those tribes, of course, I know you
23 realize that there are mounds. There are mounds
24 outside of the levee. So some of those mounds are
25 directly east of LUMCON on Bayou Sale near Deep

1 Saline, Lake Deep Saline. Some of those mounds
2 are just south of Point-aux-Chenes. Those are
3 mounds that are outside of the levee and I know
4 that y'all are doing a good job of protecting
5 property and people's lives, but these mounds are
6 not even connected to the tribes that we have in
7 this State. They are so ancient they probably
8 predate those tribes. So there's a chance that
9 the Chitimache are not interested in those mounds,
10 because those are not Chitimache mounds. They are
11 probably connected to Tchefuncte era pottery.

12 But nevertheless, I think federal money could
13 be used to protect such important ancient mounds
14 of Native Americans. And if you don't put it in
15 your big levee, I understand that, but maybe y'all
16 could put some ring levees around those Native
17 American mounds in our area. But that would be,
18 seem like the way that, that would mitigate being
19 left out of the big levee.

20 All right. That's it from Gary LaFleur at
21 Center for Bayou Studies. Thanks.

22 (THE MEETING CONCLUDED)
23
24
25

MORGANZA TO THE GULF, LOUISIANA HURRICANE AND STORM DAMAGE
Public Meeting- Theriot--USACE

Page 4

1 THE FOLLOWING IS A COMMENT MADE DIRECTLY TO THE COURT

2 REPORTER:

3 *****

4 MR. QUINT LINER:

5 Okay. On Wedgewood Court, there is a drainage
6 canal that goes from the bayou to Marmande Canal,
7 not Marmande Canal, Miners Canal. It stays
8 clogged up right now with lilies. My question
9 was, when y'all pass over that will there be a
10 culvert where that ditch is? She told me, Yes.
11 But is it gonna help dry out that property on this
12 side of the levee?

13 That's it.

14 (THE MEETING CONCLUDED AT 5:45 P.M.)

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January 21, 2026

Mr. Jason Emery

New Orleans District, U.S. Army Corps of Engineers

Attention: CEMVN-PDS

7400 Leake Avenue

New Orleans, LA 70118

VIA: mvnenvironmental@usace.army.mil

RE: Wetland mitigation impacts for the Proposed Morganza to the Gulf, Louisiana, Hurricane and Storm Damage Risk Reduction Project.

To Mr. Jason Emery, New Orleans District, U.S. Army Corps of Engineers:

We at the National Environmental Banking Association (NEBA) respectfully submit the following key positions related to the rules, definitions, and regulations for the Proposed Morganza to the Gulf, Louisiana, Hurricane and Storm Damage Risk Reduction Project as described in the December 2025 Draft Supplemental Environmental Impact Statement:

NEBA is an association of wetland and species mitigation bankers, private landowners and numerous support companies who are committed to providing high quality mitigation banks and projects to assist the private sector in addressing their regulatory needs and requirements related to the Clean Water Act and Endangered Species Act, along with other regulatory mandates requiring mitigation. NEBA supports private sector solutions to addressing wetland and species and water quality needs that provide cost-effective and efficient methods for private and public sector development to proceed in a timely manner with minimal amount of regulatory burdens, while harnessing the efficiency of the private sector to supply their needed mitigation.

- NEBA supports regulatory consistency and certainty in application of rules and regulations related to Waters of the U.S. (WOTUS).
- NEBA supports all efforts to streamline and reduce the burdens on private and public permittees under WOTUS and believes the best method to address this issue is to provide consistent and transparent application of the laws and regulations, specifically in this case, the adherence to the Mitigation Hierarchy as stipulated in the 2008 Mitigation Rule, 33 CFR Parts 325 and 332.

Headquarters

1250 Connecticut Ave NW Suite

700, Washington, DC, 20036

tel: 202-930-2365

www.environmentalbanking.org

info@environmentalbanking.org

The Corps is reminded that the 2021 Energy and Water Development Appropriations Act was passed with bipartisan cooperation and signed by President Trump in support of the 2008 Mitigation Rule. The Act includes the following language:

“Compensatory Mitigation Rule - There is concern that the Corps may not be consistent in its implementation of the 2008 Compensatory Mitigation Rule, based on the Corps’ publicly available data. There are concerns that particular districts have failed to adhere to the mitigation hierarchy in the Rule as it pertains to the preference for mitigation bank credits. The Corps is reminded that although the Rule provides some discretion, the Rule is clear that this discretion is limited and deviations from the mitigation hierarchy must be based on scientific and technical analysis. The Corps is directed to properly and consistently implement the Rule, including adherence to its mitigation hierarchy and documentation of decisions by the District Engineer regarding which mitigation mechanism is appropriate to offset impacts under the Rule and which sections of the Rule justify the particular decision. The Corps shall brief the Committees on Appropriations of both Houses of Congress not later than one year after the enactment of this Act on steps taken to ensure proper and consistent application of the Rule across districts, consistent with this direction.”

Further reinforcing the necessity for the Corps to abide by the laws and regulatory requirements of 33 CFR part 332 and 335, The Energy and Water Development Appropriations Act of 2024 was passed by Congress and signed by President Biden. The Committee included language that urged the Corps to act “*in accordance with 33 CFR 332*” and that “*The Congress has invested in this program and expects to see progress*”.

The direction to the Corps should be understood across all 38 Districts of the Corps.

The substantial wetland impacts described in the above-mentioned Environmental Impact Statement should first be addressed by exhausting all available wetland mitigation credits from authorized mitigation banks in the New Orleans District, per the requirements of the 2008 Mitigation Rule, prior to any other mitigation options being utilized.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jeffrey R. Oyen", with a long horizontal flourish extending to the right.

Jeff Oyen
Chair

From: [Craig Gothreaux - NOAA Federal](#)
To: [Logarbo, Jordan Rita CIV \(USA\)](#); [MVN Environmental](#)
Cc: [alexis.rixner@noaa.gov](#); [Emery, Jason A CIV USARMY CEMVN \(USA\)](#); [Carnes, Laura M CTR \(USA\)](#); [Amanda Young - NOAA Affiliate](#); [Brian Rosegger - NOAA Affiliate](#); [David Dale - NOAA Federal](#)
Subject: [Non-DoD Source] Re: NOAA NMFS - Personal Coordination Letter: Morganza to the Gulf Public Review for draft SEIS
Date: Friday, January 23, 2026 2:44:44 PM

Jordan,

The NMFS Habitat Conservation Division (HCD) has reviewed the draft supplemental environmental impact statement (SEIS) and associated appendices for the Morganza to the Gulf, Louisiana, Hurricane and Storm Damage Risk Reduction Project (MTG Project). The MTG Project is in an area designated as essential fish habitat (EFH) for various life stages of federally managed species, and we concur with the species list and habitat characterizations described in the EFH assessment for the project. The primary categories of EFH which would be affected by project implementation are estuarine water column, water bottoms, submerged aquatic vegetation, and emergent wetlands, including fresh, intermediate, brackish, and saline marshes.

As described in the SEIS, the MTG Project would result in adverse impacts to EFH, and a compensatory habitat mitigation plan was developed to fully compensate for project impact to wetlands. The tentatively selected plan mitigation alternative for each habitat type consists of a combination of the purchase of mitigation bank credits and/or the implementation of a USACE-construction mitigation project. The NMFS HCD is supportive of the mitigation plan provided all mitigation for EFH be located outside of the flood protection system, ideally within the hydrologic basins where the impacts occur. Please continue to coordinate with HCD in the further development and implementation of the MTG Project mitigation plan. The EFH consultation requirements of the Magnuson-Stevens Fishery Conservation and Management Act have been fulfilled for the MTG Project. The NMFS appreciates the consideration of our concerns and the close coordination of the USACE New Orleans District.

Thank you for your coordination,
Craig

From: [MVN Environmental](#)
To: [Carnes, Laura M CTR \(USA\)](#)
Subject: FW: New Orleans District Contact Form: Flood Insurance
Date: Monday, January 12, 2026 11:16:32 AM

Message:

Terrebonne Parish has constructed some great levees for hurricane protection. I understand that for Hurricane Ida there may have been one house that had a little water at the southernmost part of the parish. After that storm flood zones were greatly increased causing many people to have to pay flood insurance who never had to before and it's totally unnecessary. I have lost quite a bit of money because I bought a house to flip and then couldn't sell it because it then had to have flood insurance. The financial hardship it caused made me sell it and 5 other houses at tremendous discounts to get out of that debt. I also have another house that someone wants to buy but can't because of those ridiculous flood insurance requirements. There are many people in the same situation. The flood zones should at a minimum be rolled back to what they used to be but actually even more so. Our levees proved that the height doesn't need to be what the government thinks they should be

MTG SEIS Comment

Ref Id: _5EUCpEYEE0j9XPYwyyscg



January 23, 2026

Mr. Jason Emery, Chief, Environmental Planning Branch
U.S. Army Corps of Engineers
New Orleans District, CEMVN-PDS
7400 Leake Ave. New Orleans, LA 70118

RE: Draft Supplemental Environmental Impact Statement for Morganza to the Gulf, Louisiana Hurricane and Storm Damage Risk Reduction Project

Mr. Emery,

Restore the Mississippi River Delta (MRD) is a coalition of national and regional nonprofit organizations working to ensure an equitable, safe, and flourishing coast for Louisiana's communities, ecosystem, and economy. We are represented by policy, science, communications and outreach experts from Environmental Defense Fund, National Audubon Society, the National Wildlife Federation, and Pontchartrain Conservancy, and we represent thousands of Louisiana supporters. As a coalition with long-standing interest in coastal Louisiana, we appreciate this opportunity to provide comments on the Draft Supplemental Environmental Impact Statement (SEIS) for Morganza to the Gulf, Louisiana Hurricane and Storm Damage Risk Reduction Project (Morganza).

Recent design refinements to Morganza were made to reduce costs while maintaining the project's authorized level of risk reduction, including adjustments to the proposed footprint to align with existing non-federal levees and minimize both fill requirements and impacts to wetland habitat. In this context, our comments focus on ensuring that all unavoidable habitat impacts are fully mitigated, consistent with the commitment that compensation occurs prior to or concurrent with construction of the Proposed Action.

The purpose of compensatory mitigation is to offset avoidable and adverse impacts of a project to replace the loss of wetland and aquatic resource functions. Compensatory mitigation can include wetland restoration to restore natural or historic functions, creation (or establishment) where a wetland did not previously exist, enhancement to heighten, intensify, or improve one or more wetland functions, such as water quality or flood water intention, and preservation to permanently protect ecologically important wetlands or other aquatic resources by implementing legal and physical mechanisms. The scale of Morganza will directly impact 4,500 acres of wetlands and is expected to indirectly impact up to an additional 1,300 acres of wetlands. The tentatively selected plan (tsp) for mitigation suggests using a combination credit purchase from in-kind mitigation banks and U.S. Army Corps of Engineers (the Corps) constructed projects. However, we

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urge the Corps to work with Louisiana's Coastal Protection and Restoration Authority (CPRA) to identify and implement mitigation that meaningfully replaces the wetland loss and functions at the scale of Morganza.

We offer the following specific comments:

Align Mitigation Needs with Coastal Master Plan Projects

While mitigation banks are favored in this SEIS and by the Corps in general, construction of restoration projects identified in the 2023 Coastal Master Plan would better address direct and indirect impacts of the Morganza system than a mitigation bank while also helping rebuild the protective wetlands outside the system. In addition, restoration of wetlands in this area could help protect communities left outside the levee system. We urge the Corps to reconsider the Isle de Jean Charles mitigation sites which are in the footprint of the Eastern Terrebonne Landbridge-East project selected in the 2023 Coastal Master Plan. By working with CPRA, other funds may be leveraged to help reduce the costs and risks needed to meet mitigation needs.

Use the Houma Navigation Canal (HNC) Lock Complex to Enhance Existing Wetlands

The Houma Navigation Canal Lock Complex is a large-scale flood protection, navigation, and hydrologic restoration project. This project is currently under construction with funds from the Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act (RESTORE). Part of Morganza, the primary goal of this project is to reduce saltwater intrusion, restoring historic salinities by retaining fresh water in the Terrebonne Basin. Despite the source of funding and the stated primary goal of the project, little analysis has been done to optimize the benefits of permitted operations to enhance the health of wetlands inside Morganza. Hydrodynamic models exploring the environmental benefits of the project by Hanegan et al. 2022 (attached) found that the lock structure could provide ecosystem benefits, benefits which may be further enhanced through the operation of nearby gated structures. We ask the Corps to work with CPRA to explore the operation of HNC to enhance existing wetlands to offset the projected impacts of Morganza.

In-Basin Mitigation

The tentatively selected mitigation site identified for freshwater marsh is in the Delta Farms' area of the Barataria Basin. In-basin mitigation is preferred in order to replace the lost habitat and ecological functions. However, loss of marsh in the Delta Farms' area has increased the vulnerability of the eastern flank of the levee system. Restoration in this area would address impacts to freshwater wetlands from the project and also increase the resiliency of the system to storms.

Bottomland Hardwood and Swamp Restoration

The tentatively selected plan for bottomland hardwood and swamp restoration relies on mitigation bank credits or conversion of agricultural lands into bottomland hardwood forest or swamp habitat. We urge the Corps to examine opportunities to enhance health of existing bottomland hardwood forest and swamp habitat in the basin rather than



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construct new habitat that might take decades to provide or not ever provide the same quality of habitat and ecosystem services of the habitat impacted by the project.

Use Sustainable Sediment Sources

Because the Terrebonne Basin lacks a natural, ongoing connection to freshwater and sediment from the Mississippi River, restoration efforts must prioritize sustainable sediment sources that can be replenished over time. Reliance on finite or distant borrow sources increases costs, limits scalability, and undermines long-term effectiveness. Using sustainable sediment sources is essential to ensure projects can be maintained, expanded, and continue delivering land-building and resilience benefits as sea levels rise and subsidence continues.

In closing, we urge that mitigation commitments for Morganza to the Gulf be clearly defined and implemented prior to or concurrent with construction to ensure no net loss of wetland function. Upholding this standard is essential to maintaining ecological integrity while delivering long-term risk reduction benefits to the region's communities. We thank you again for the opportunity to provide input and look forward to engaging further with this issue.

Sincerely,

Simone Maloz
Campaign Director
Restore the Mississippi River Delta

Kristi Trail
Executive Director
Pontchartrain Conservancy

Lauren Bourg
Director, Mississippi River Delta Program
National Audubon Society

Amanda Moore
Senior Director, Gulf Program
National Wildlife Federation

Will McDow
Senior Director, Climate Resilient Coasts & Watersheds
Environmental Defense Fund



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MEMORANDUM

To: Restore the Mississippi River Delta Coalition, Simone Maloz

From: Kevin Hanegan, Tim Nelson, and Zhanxian Wang (Moffatt & Nichol) and Dr. Denise Reed (UNO)

Date: November 16, 2022

Subject: Modeling Memorandum

Project: Houma Navigation Canal Lock Complex: Preliminary Environmental Modeling Assessment

M&N Job No.: 220800

Cc: Alisha Renfro, Michael Hopkins, Rachel Rhode, Jonathan Hird, Jeff Shelden

1. Introduction

Project Background

The Houma Navigation Canal (HNC) Lock Complex, located in the Terrebonne Basin southwest of Dulac, LA in Terrebonne Parish is currently under construction. The project integrates a low-lift, sector-gated lock chamber with the existing Bubba Dove barge floodgate across the HNC to allow navigation activities to continue during floodgate closures. The floodgate, an integral component of the Morganza to the Gulf (MTG) Hurricane Protection System, is closed to protect interior communities from storm surge and to prevent saline intrusion impacting local water supplies and associated ecosystem impacts.

According to the 2018 permit application, the lock complex will be operated for both flood and salinity control. For flood control, the lock and floodgate will be closed when a hurricane watch has been issued and the measured stage at the floodgate reaches +2.5 ft NAVD88 and will be reopened when the watch has been discontinued and the differential stage across the gate is less than or equal to 1.0 ft. The Revised Programmatic Environmental Impact Statement (RPEIS) details that the lock complex will be closed to control salinity if Atchafalaya River flows measured at Simmesport are less than 100,000 cfs and the salinity in the HNC south of the complex exceeds a value associated with chloride levels of 250 ppm, roughly corresponding to a measured salinity of 7.5 ppt at the USGS Dulac Gage (USACE, 2013).

The RPEIS examined the indirect impacts of the MTG system and its operation, including the salinity control operations of the lock, and noted minor impacts to large areas of wetlands. However, the RPEIS notes that the cumulative impact of MTG, when combined with other restoration efforts, including Convey Atchafalaya River Water to Northern Terrebonne Marshes and Multipurpose Operation of Houma Navigation Lock under LCA (USACE, 2013), could be of net benefit to the study area. Despite the permitted salinity control operations, there has been little analysis to date on the expected environmental benefits of such operation or if alternative operational schemes could potentially increase ecosystem benefits by improving the distribution of freshwater to adjacent basins. Analysis conducted for the LCA project feasibility study assumed that the salinity operation of the lock would result in closure for two months each year. The study examined an alternative where the lock was closed to allow for freshwater distribution, rather than the prevention of salinity intrusion. However, the analysis assumed that the lock was closed all year and the result was a net additional loss of wetlands of over 2,500 acres compared to the Future without Action.

The Restore the Mississippi River Delta Coalition (the Coalition), in its advocacy for comprehensive ecosystem restoration, has identified the HNC Lock Complex hydrologic restoration as one of 19 priority projects for restoring a

functional and sustainable Delta and Gulf ecosystem. The Coalition seeks to advance the understanding of how the project, planned for flood control and to prevent salinity intrusion, could be operated to also enhance ecosystem health through improved distribution of freshwater before construction is complete.

Purpose and Scope

The goal of this proposed project is to conduct an initial assessment of the potential to achieve environmental benefits from alternative operations of the HNC Lock Complex. Later project phases would further explore refining operations to increase environmental benefits while minimizing adverse impacts, such as increased flooding, and expand the analysis to include other proposed Terrebonne Basin projects including TE-110 – Increase Atchafalaya Flow to Terrebonne.

To conduct the initial assessment of environmental benefits with alternative HNC Lock Complex operations, Moffatt & Nichol (M&N) utilized a hybrid, numerical modeling-based approach. The State of Louisiana has developed a suite of individual modeling tools to aid in their coastal master planning efforts that are designed to evaluate the impacts of protection and restoration projects on water levels, salinities, wetland vegetation communities, and the coastal landscape. Originally developed for use in the 2012 Coastal Master Plan (CMP), the Integrated Compartment Model (ICM) modeling components were subsequently integrated and improved for the 2017 Coastal Master (Brown, et al., 2017a; CPRA, 2017). During these efforts, hundreds of projects were modeled for 50 years into the future to determine effectiveness in achieving restoration and protection goals to prioritize investments. The Coastal Protection and Restoration Authority (CPRA) is currently preparing for the 2023 update to the CMP by improving the ICM model and components, with model compartments and links that are more aligned to and representative of the coastal hydrologic features. M&N used the ICM model developed to support the 2023 CMP for a limited set of runs exploring both hydrologic and environmental outcomes with alternative HNC Lock Complex operations.

Additionally, M&N applied a complementary two-dimensional (2D) hydrodynamic model, developed to support the feasibility analysis and design of the TE-110 – Increase Atchafalaya Flow to Terrebonne project (Moffatt & Nichol, 2015b; Moffatt & Nichol, 2020b), to model a limited set of scenarios from the ICM modeling to investigate the hydrodynamics and salinities in the complex vicinity with greater resolution. Together, these modeling analyses provide a preliminary assessment of potential environmental benefits under feasible alternative operations and will form the basis for additional, more comprehensive study in later project phases.

2. Environmental Modeling Assessment Approach

Analysis of the potential for achieving environmental benefits with alternative lock complex operations was primarily conducted using the 2023 CMP ICM. Currently being modified and improved for use in the 2023 Master Plan, the ICM model analyzes landscape and ecosystem evolution as a function of hydrodynamics and salinity under a variety of future environmental scenarios subject to the influence of planned or proposed protection or restoration projects (Meselhe, Reed, & Grace, 2017). Still, the ICM is a “computationally efficient, coast wide mass balance model” that can be used for a large number of 50-year simulations in a reasonable timeframe (Brown, et al., 2017a), with hydrology modeled using a mass balance approach where coastal Louisiana is discretized into a series of compartments connected by links that control flow. These compartments vary widely in size across the coast but are on the order of 100 km² (Brown, et al., 2017a).

To supplement the ICM-based analysis described above, a complementary two-dimensional (2-D) hydrodynamic and salinity model is also used to offer a more detailed understanding of the hydro and salinity dynamics in the lock complex vicinity under alternative operational schemes. Using the existing Mike21-Flexible Mesh (FM) Hydrodynamic (HD)

Terrebonne Basin model developed to support the TE-110 project (Moffatt & Nichol, 2015b; Moffatt & Nichol, 2020b), a limited set of hydrologic conditions is also modeled for higher resolution analysis of lock complex operations impacts to hydrodynamics and salinities. This computational hydraulic model solves hydrodynamic (water level, velocity, flows) and salinity parameters on a high-resolution computational mesh with spatial resolution on the order of 10's of meters, representative of the flow patterns across the Terrebonne Basin landscape. As Mike21-FM is a more computationally intensive model, practical simulation periods are on an annual timescale (vs. decadal for the ICM model).

ICM Model

Integrated Compartment Model

The State of Louisiana has developed a suite of individual modeling tools to aid in their coastal master planning efforts that are designed to study key coastal processes over decadal timescales. During these efforts, hundreds of projects were modeled for 50 years into the future to determine effectiveness in achieving restoration and protection goals and to prioritize investments (CPRA, 2017). Updates to the modeling approach for the 2023 CMP generally included improved integration of models and components, incorporating newly available data, including updated topo/bathy and wetland vegetation data, and applying new approaches to better capture wetland morphology processes (Baustian, et al., 2020). While documentation of ICM updates for the 2023 CMP is pending, significant updates for the wetland morphology (ICM-Morph) and vegetation (ICM-LAVegMod) modules replaced habitat type specific wetland collapse thresholds with a habitat independent critical water depth that varies as a function of salinity, revised the approach for determining marsh accretion incorporating organic matter accretion rates, and updated the treatment of floatant marsh (Baustian, et al., 2020). The ICM-Hydro module, responsible for computing stages and salinities across the coast, was updated to include coupled one-dimensional hydrodynamic models for four major rivers and channels (including the Atchafalaya River), and compartments and links were re-delineated to better correspond to coastal features; however, the basic mass-balance type approach for wetland and coastal areas remains unchanged from that used in the 2017 CMP (Brown, et al., 2017a). For more information on the different modules and components of the ICM, the reader is directed to recently developed support materials for the updated model (<https://coastal.la.gov/our-plan/2023-coastal-master-plan/technical-resources/>) and the technical appendices of the 2017 CMP: <https://coastal.la.gov/our-plan/2017-coastal-master-plan/> (CPRA, 2017). The ICM modeling for this study used the most up to date 2023 CMP ICM code at the time runs were conducted (late summer 2022), with version numbers and code repository links for the most important modules provided in Table 1.

Table 1: ICM module code versions used in this study

ICM Module	Version	Repository Link
ICM-Hydro	v23.4.1 with additional link control rules	https://github.com/CPRA-MP/ICM_Hydro/tree/hydro_mp23_HNC_controls
ICM-Morph	v23.2.1	https://github.com/CPRA-MP/ICM_Morph/releases/tag/v23.2.1
ICM-LAVegMod	v3.0.0	https://github.com/CPRA-MP/ICM_LAVegMod/releases/tag/ICM-LAVegMod_v3.0.0

Boundary Conditions

Model boundary conditions for the ICM model were generally the same as those used to support the state's 2023 CMP ICM modeling (CPRA, in preparation). Detailed documentation of the boundary condition data sources and derivations for the 2023 CMP is in preparation; however, the approach for each boundary condition type is similar to the 2017 CMP (Brown, 2017b).

- **Precipitation:** daily rainfall depths for model calibration periods were developed from a combination of radar rainfall data and rain gauge data.
- **Tidal:** tidal water levels at the Gulf boundaries were driven by measured data from NOAA tidal gages, adjusted to remove the long-term subsidence trend (Brown, 2017b) and incorporating synthetic storm surge and subtidal residuals (CPRA, in preparation; White, 2021).
- **Tributary Inflows:** freshwater inputs from rivers were developed using a combination of measured data and derived rating curves, similar to the 2017 CMP approach (Brown, 2017b). Importantly, the upstream Mississippi River (MSR) discharge timeseries from which all MSR tributary inflows, including the Atchafalaya River, are derived, was altered to use the discharge timeseries from the 2006-2019 calibration/validation period instead of the future conditions timeseries developed from ensemble averaging of basin-scale hydrologic forecasts (White, 2021). This was done to simulate more varied hydrologic conditions, as the measured data from 2006-2019 shows greater hydrologic variability (both higher high flows and lower low flows) than the future conditions data (see Figure 1). The 2006-2019 discharge timeseries was shifted in time and applied for the ICM simulation years 2018-2030. For all other tributary inputs (i.e. those not derived from MSR flow), the same inflows used in the 2023 CMP ICM production runs were used.

Information on the environmental scenario used for this analysis is included in subsequent sections.

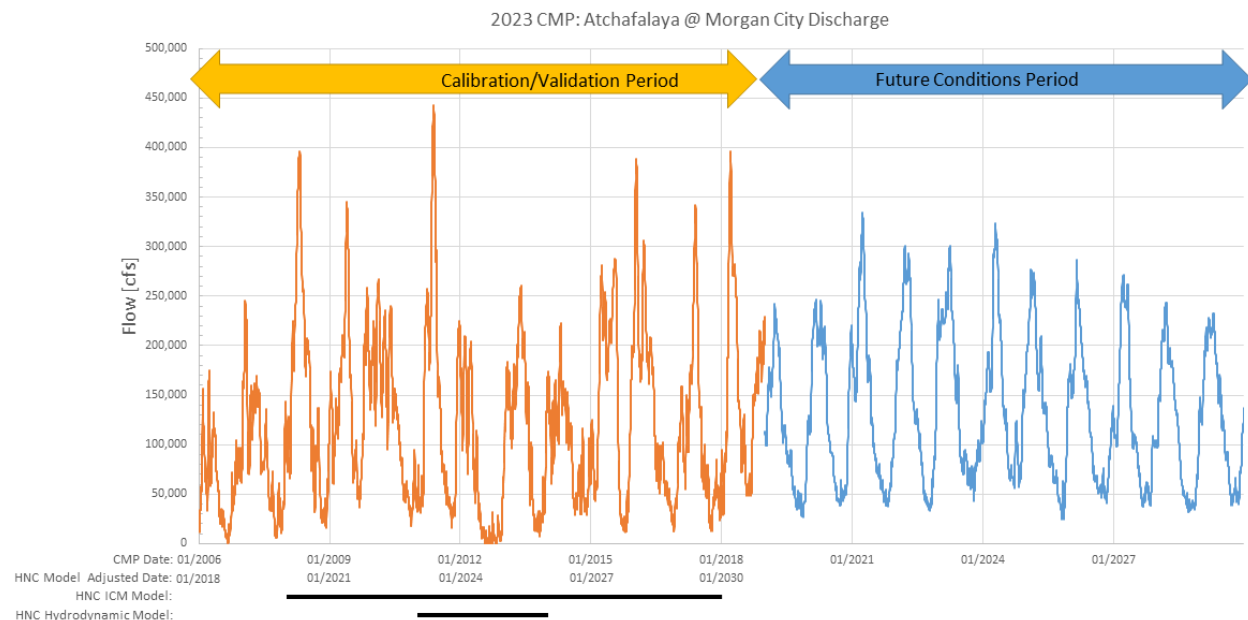


Figure 1: Comparison between 2023 CMP ICM simulated flows in the Lower Atchafalaya River at Morgan City for the calibration/validation period (2005-2018) and the future conditions period. The calibration/validation period discharge timeseries was shifted in time and applied for the ICM simulation years 2019-2031 (see lower time axis). The Mike21-FM hydrodynamic model used the same shifted discharge timeseries for upstream boundary conditions, run for the analysis years 2024 and 2025.

HNC Lock Complex Implementation

In the 2023 CMP ICM model, the HNC Lock Complex is represented as a channel link with a hydraulic control structure, where flow between connected compartments (those immediately upstream and downstream of the lock complex) is computed according to stages in those compartments, channel geometry characteristics, and a specified control rule that allows or blocks flow through the link. In the 2023 CMP Future Without Action (FWOA) runs, the control rule operates on differential stage across the lock complex, where flows are allowed only when upstream stages are at least 0.15 m greater than downstream stages so that only north to south flows are allowed.

Hydrodynamic Model

Model Platform

The Mike21-FM model is a commercially available modeling suite developed by the Danish Hydraulics Institute (DHI). The suite is able to fully couple a number of modules, including hydrodynamics, spectral waves, sediment transport (cohesive and non-cohesive), morphology, and water quality. The Mike21-FM HD model is a two-dimensional, depth-averaged model which simulates unsteady free-surface water levels, flows, and salinity transport in rivers, estuaries, lagoons, and other coastal water bodies. The horizontal grid uses unstructured triangles or quadrilaterals, and the mesh can be easily refined in a particular area without affecting the mesh resolution in the rest of the model, allowing for a more detailed assessment in small areas of interest while still efficiently integrating with the full domain. The flexible mesh of Mike21-FM is ideal for developing large regional models with areas of high local resolution. Without any important vertical variations in flows and salinity patterns within the study area, the model was run two-dimensionally (2D) in depth-averaged mode.

Model, Mesh, and Bathymetry

To support feasibility assessments of the TE-110 Increase Atchafalaya Flow to Terrebonne (IAF) freshwater diversion project, M&N previously developed a basin-scale 2D hydrodynamic model using the Mike-21 FM platform (Moffatt & Nichol, 2015b). The model domain is bounded by the Gulf Intracoastal Waterway (GIWW), Lake Verret, and Bayou Black to the north, Wax Lake Outlet to the west, Bayou Lafourche to the east, and the Gulf of Mexico offshore of the coastal zone to the south. Through subsequent engineering and design work, the model has been expanded to include the full Verret Basin catchment area and has been refined in many areas including the GIWW and the HNC Lock Complex vicinity (Moffatt & Nichol, 2020b; Moffatt & Nichol, in preparation). The model bathymetry and topography were compiled from a number of sources. The most recent and highest resolution data were used where available in most instances. Bathymetry data collected as part of the IAF project to define the critical interconnected waterways within the Terrebonne marshes and the GIWW has also been incorporated. For this study, the Future Without Project (FWOP) configuration without implementation of the TE-110 project was used. The full model mesh and model bathymetry in the HNC Lock Complex vicinity are shown in Figure 2.

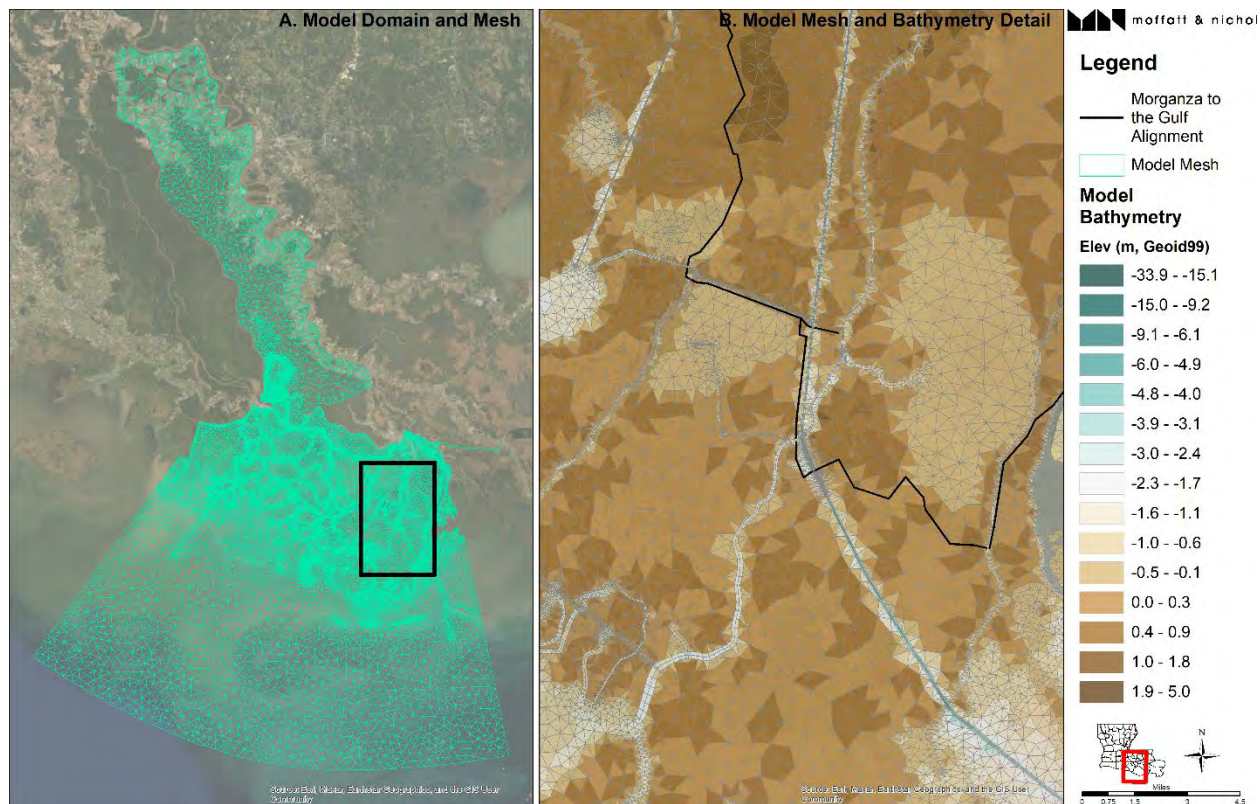


Figure 2: (A) IAF model mesh and domain and (B) mesh and bathymetry detail of the HNC

Boundary Conditions

For the IAF feasibility evaluations (Moffatt & Nichol, 2015b), model results were analyzed over a period of 50 years, from the beginning of project operation in 2020 to the year 2070. To drive this model under future conditions, 50-year synthetic hydrographs of Atchafalaya River discharge at Morgan City and Wax Lake Outlet discharge were developed from a 50-year synthetic Mississippi River hydrograph provided by CPRA. Synthetic water level and evaporation/precipitation timeseries were similarly developed for the 50-year simulation period (Moffatt & Nichol, 2015b). Tidal boundary conditions were formulated to include the projected less-optimistic Sea Level Rise (SLR) scenario from the 2012 State Master Plan, equal to 1.0 meters between 1992 and 2100, and spatially-varying subsidence was included with values equal to 20% of the range given in the Master Plan (Coastal Protection and Restoration Authority of Louisiana (CPRA), 2013; Moffatt & Nichol, 2015b).

These previously used boundary conditions were updated for this study to be consistent with those applied in the ICM modeling.

- **Precipitation:** the spatially-varying precipitation boundary applied to the ICM was used to extract a time series at a single representative compartment that was then applied over the full Mike-21 FM model domain
- **Tidal:** The model was forced with an astronomical tidal signal composed of both water level and velocity fluctuations (a combination known as a Flather boundary condition that promotes numerical stability near the boundaries) derived from the most important tidal constituents and adjusted to include the seasonal fluctuations from the NOAA Grand Isle, LA station (8761724). Constituents at the model boundary were extracted from the OSU Regional Tidal Solutions for the Gulf of Mexico (Egbert & Erofeeva, 2002). The SLR

signal and storm surge and subtidal residuals from the 2023MP (White, 2021; CPRA, in preparation) were then superimposed onto the astronomic tidal signal.

- **Discharge:** The Mike21-FM model has two upstream flow boundaries. The primary Atchafalaya River discharge boundary is located at Morgan City, so applied discharges were derived directly from USGS flow measurements at the 07381600 station. Consistent with the ICM modeling simulation period and flow boundary approach, this measured timeseries beginning in 2006 was shifted forward in time to be applied beginning in 2018 (see Figure 1). The other flow boundary at the Wax Lake Outlet at Calumet was derived from the Atchafalaya River at Morgan City measured discharge using a rating curve approach, consistent with prior IAF modeling studies (Moffatt & Nichol, 2015b).

HNC Lock Complex Implementation

The IAF model mesh was updated to include higher resolution for the Houma Navigation Canal (HNC) lock, floodgate, and adjacent sill riprap according to the project design (Figure 3). The existing floodgate opening width is 250 ft with an invert elevation of -24 ft NAVD88. Additionally, the lock chamber is 110 ft wide with a sill elevation of -23 ft. Figure 4 shows the georeferenced plan view along with the updated mesh topology. After the grid topology was updated, the bathymetry was updated according to design plans drafted by APTIM Environmental & Infrastructure, Inc (Herman, 2018). Gates are defined across both the lock and floodgate openings and are operated in tandem (i.e. both gates open and close according to the same operational rules). It should be noted that while the full MTG alignment and other control structure openings are included in the model, operational gates on other flowpaths through the alignment besides the lock complex are not; thus, flows through these other openings are unregulated.

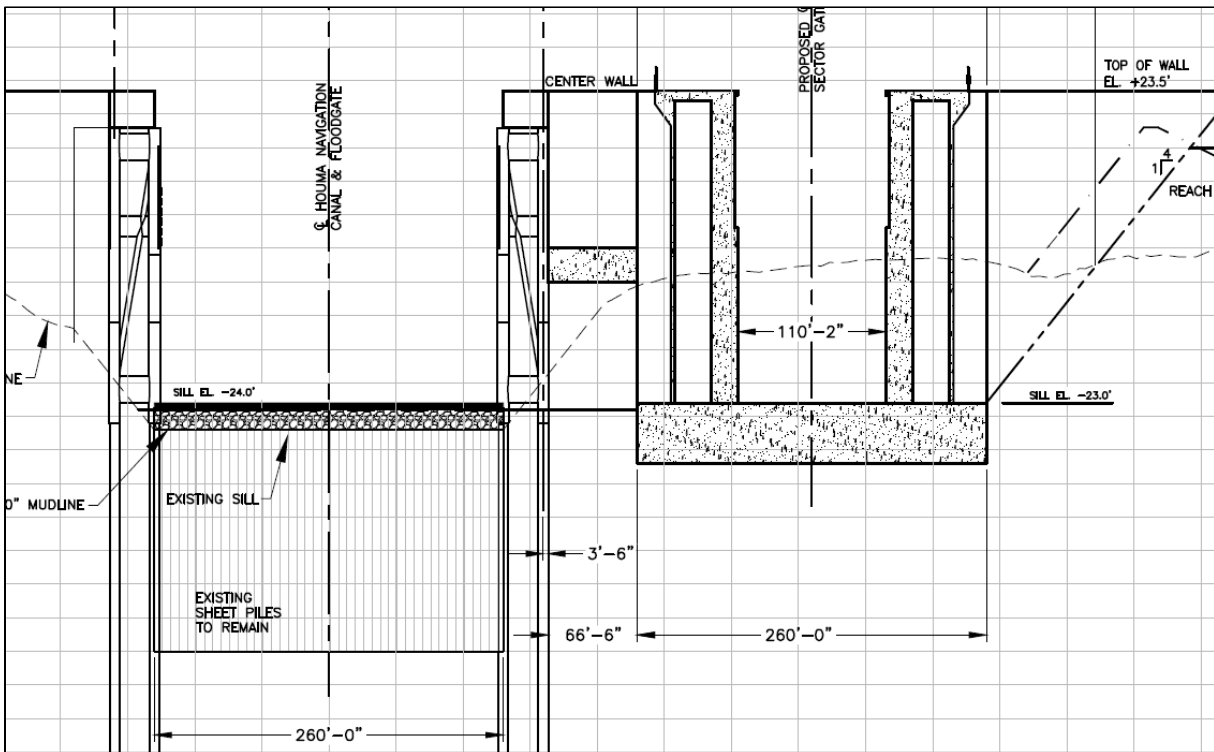


Figure 3: 2017 HNC Lock Complex section from permit drawings.

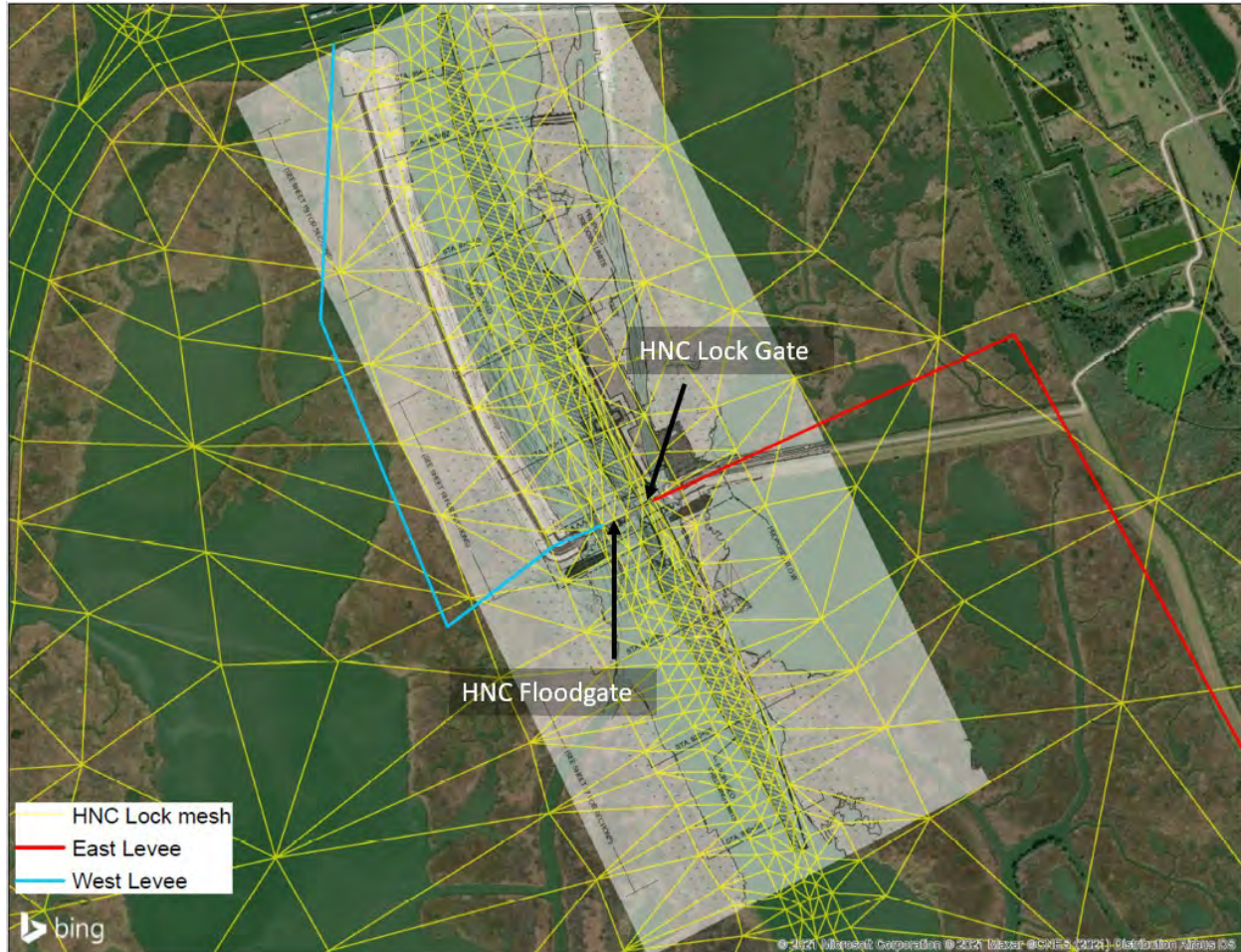


Figure 4: Georeferenced image of HNC lock complex, model grid (yellow) and levees (blue)

Lock Complex Operational Schemes

To analyze the potential for alternative HNC Lock Complex operations for environmental benefits, three operational schemes were analyzed:

1. **Surge Only Operations:** The full lock complex is closed only when the downstream water surface elevation exceeds +2.5 ft NAVD88. This operational scheme mimics the present-day operation of the HNC Floodgate (without the under-construction lock) where closures are only to prevent flooding within the MTG protected area during storm surges. Simulating this scheme allows for comparisons with other proposed schemes that consider salinity to determine the potential impacts.
2. **Permitted Operations:** The full lock complex is closed when the downstream water surface elevation exceeds +2.5 ft NAVD88 OR the upstream salinity exceeds 7.5 psu. This is the operational scheme proposed in the project environmental documentation and permit, meant to prevent high saline intrusion as well as storm surge.
3. **High Flow Operations:** The full lock complex is closed when the downstream water surface elevation exceeds +2.5 ft NAVD88 OR the upstream salinity falls below 3 psu. This operational scheme is designed to close the lock complex when salinities are low (typically during higher Atchafalaya River flow periods when freshwater is routed to the HNC) to distribute the freshwater flowing south through the HNC east and west via Falgout

Canal and Bayou Grand-Caillou/Bayou Dulac into adjacent marshes where fresher conditions could be beneficial.

For each of these schemes, the intended operations of both the HNC Floodgate and Lock (the lock complex) were necessarily simplified and schematized for implementation in the numerical modeling framework. These include using both stage and salinity thresholds for closure and reopening that did not vary through time and operating both the floodgate and lock together with identical control rules. While on-the-ground operations may vary from these schemes (i.e. earlier surge closures in anticipation of storms and/or operating the two structures separately), the model schematizations are still representative and useful for projecting operational impacts.

Production Runs

The 2023 CMP team developed a set of four future climate scenarios for use in ICM modeling and planning (CPRA, in preparation; White, 2021). Each of the scenarios imposes specific sea level rise values (regionally adjusted for the Louisiana coast) (Sweet, et al., 2017), combinations of deep and shallow subsidence (Fitzpatrick, Jankowski, & Reed, 2020), and precipitation/evapotranspiration values. SLR and Precipitation/ET values are tied to future emission scenarios or Representative Concentration Pathways (RCP), while subsidence varies by using either the first quartile or median of estimated ecoregion shallow subsidence values (Table 2). Note that the Mississippi River discharge boundary conditions and derived Lower Atchafalaya River (LAR) flows are constant across all scenarios.

Table 2: Summary of climate scenarios developed and considered for use in the 2023 CMP (CPRA, in preparation; White, 2021). The scenario selected for use in this study ("Lower") is highlighted in blue.

	Lower	Higher
Sea level rise (regionally adjusted)	NOAA Intermediate (~0.50 m by 2070; ~1.07 m by 2100)	NOAA Intermediate High (~0.77 m by 2070; ~1.75m by 2100)
Temperature and Evapotranspiration	following <u>RCP 4.5</u> 50th percentile	following RCP 8.5 50th percentile
Precipitation and Tributary flows	following <u>RCP 4.5</u> 50th percentile	following RCP 8.5 50th percentile
Subsidence	low: deep subsidence + <u>1st quartile</u> shallow subsidence by ecoregion	high: deep subsidence + <u>median</u> shallow subsidence by ecoregion
MR hydrograph (does not vary)	projections based on RCP 4.5	projections based on RCP 4.5

With only a limited, 10-year simulation period beginning for current conditions in the ICM, differences between scenarios (with low cumulative RSLR) are not that impactful. As such, the Lower scenario was chosen for use in this study. Within this ten-year period, storm conditions are included by using the results of storm surge analyses on synthetic storms to drive the offshore boundary water levels (CPRA, 2023 in preparation). Therefore, storm conditions in these simulations do not represent individual historical storm events.

To take advantage of the full ICM functionality (including ICM-LAVegMod and ICM-Morph modules), simulations were conducted using the future conditions framework, with simulations beginning in year 2018 with two years of spin-up, then an analysis period of 2020-2030. The MSR and derived tributary inflows used measured data from 2006-2018 that was shifted in time to be applied for the future conditions period. The 2023 CMP ICM Future Without Action (FWOA) model run was used as a base setup for production runs with no additional model updates except those related directly to the HNC Lock Complex and its operations.

All three operational scenarios detailed in prior sections were simulated using the ICM, with each run for the 10-yr analysis period. The Mike21-FM model was then used to simulate only the Surge Only and Permitted operational scenarios. With longer model runtimes, the Mike21-FM model was only run for a selected 2-yr period from 2024 through 2025, including year 2023 as a spin-up period. The Mike21-FM model has limitations when schematizing gate operations compared with the ICM. For the Surge Only scenario, the lock complex could be controlled in real time using a defined water level threshold; however, Mike21 does not allow for salinity threshold control so gate operations in the Permitted operations scenario had to be pre-defined based on the open and closed periods simulated in the companion ICM run.

3. Results and Discussion

The effects of changing the operational scheme for the lock complex can best be explored through comparison of different schemes under different conditions, e.g., wet year vs. dry year. This section first presents results for the Surge Only Operations, and then compares them with the Permitted Operations and High Flow Operations results to evaluate potential salinity reduction and ecosystem benefits associated with alternative lock complex operations.

Surge Only Operations

Under Surge Only Operations, the lock complex remains open for the duration of the simulation except for brief operational events (closures) when the synthetic storm series produces high surges. As expected, salinities upstream of the lock complex increase during periods of low Atchafalaya River flow when seaward flows in the HNC are reduced (Figure 5).

The highest observed salinities coincide with the most intense storm included in the series (October 2024), where a negative spike (representing post-surge drainage flow directed southward) is evident in the flow timeseries. The lock does close for this event, but the water level threshold to trigger closure is not reached until after some surge has propagated upstream, bringing some amount of saline intrusion during an already very low river flow and high salinity period.

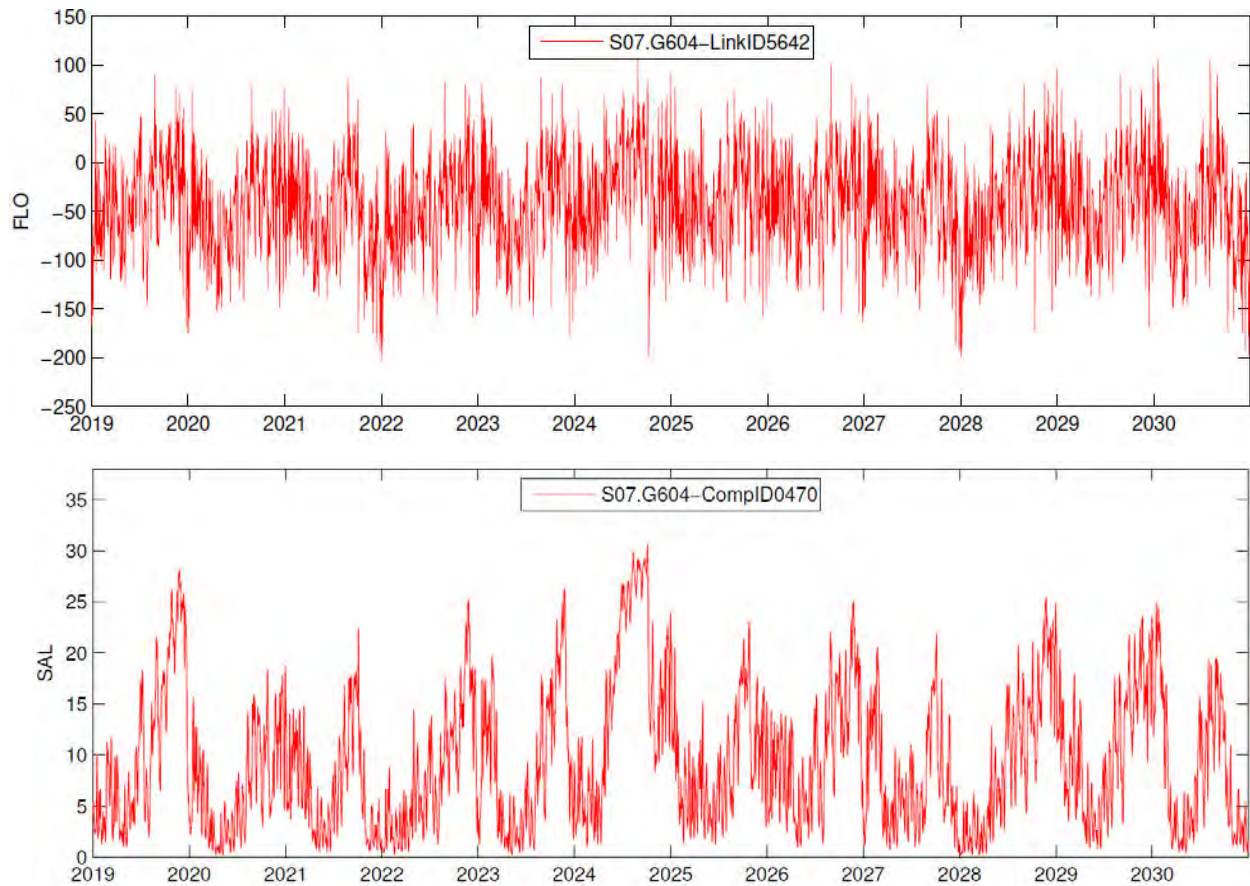


Figure 5: Daily averaged flow (m^3/s) through the model link representing the lock (top) and salinity (psu) in the upstream compartment (bottom) for the Surge Only Operations. For flow, negative values indicate southward flows, while positive values indicate northward flows.

The accumulated discharge (flow) and salinity fluxes through each of the MTG flowpaths (including the HNC) were analyzed in greater detail using the Mike21-FM model. Figure 6 plots the cumulative discharge (top panel) and salinity flux (lower panel) through six selected MTG flowpaths during the three simulated years (with model spin-up during year 2023). Plots for transect labeled MTG05 represent cumulative flows and salinity intrusion through the HNC Lock Complex, with positive values indicating net northward flux and negative values indicating net southward flux.

The salinity fluxes indicate that the HNC lock is the dominant salinity path into the basin. Minor contributions are also evident at Falgout Canal (MTG02), Bayou Grand Caillou (MTG04), and Bayou Petit Caillou (MTG08) during periods of low flow. Although the lock is closed during the storm surge event, there is still significant intrusion in the period leading up to the closure. Additionally, while the plot indicates storm surge associated intrusion through non-HNC gates, it should be noted that these floodgates would likely be operated for storm surges as well, with associated reductions in intrusion at the surge peak.

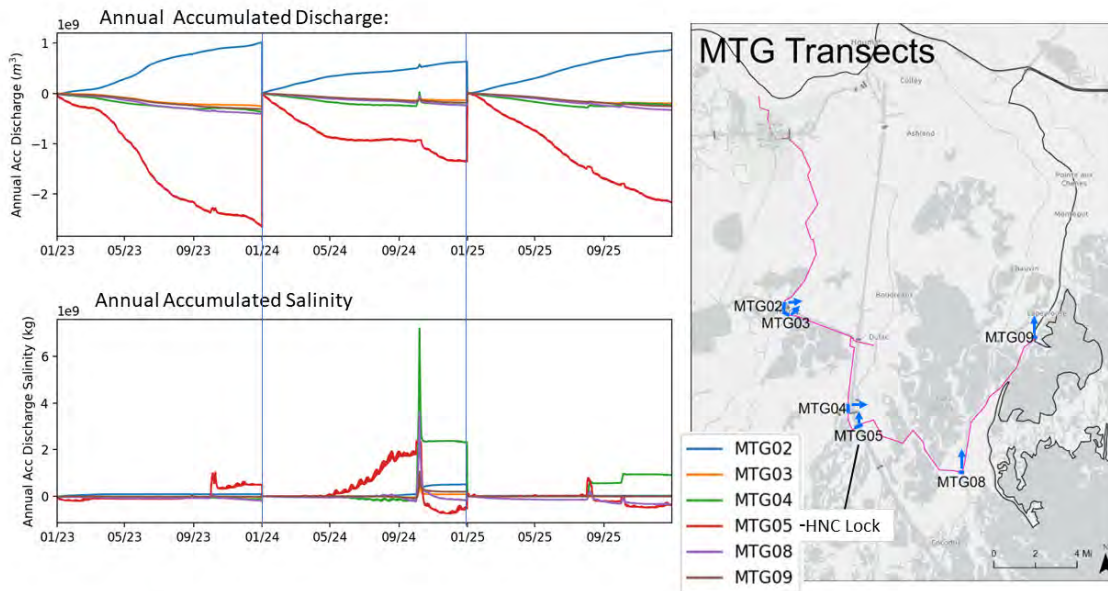


Figure 6: Annual accumulated discharge (top) and salinity (bottom) fluxes into the basin for Surge Only Operations. Note that accumulated values reset to zero at the start of each year (horizontal blue lines) to better represent seasonal variations across years. Positive values indicate flow into the basin as depicted by arrows on the map.

Permitted Operations

Under the permitted operations, the lock complex is additionally operated (closed) during periods of high salinity, as intended. This is apparent in 2024 (Figure 7) when salinities reach well over 20 ppt while the lock is closed (indicated by zero flow values in the upper panel). Note that this corresponds to year 2012 in the boundary conditions used, which was a particularly low flow year in the Atchafalaya River (Figure 1). Other periods of extended closure occur with low flows in 2019, 2029 and 2030. Compared with the flow results from Surge Only operations, lock complex closures under the Permitted operations generally correspond to low Atchafalaya flow periods when negative (northward) flows in the HNC that increase upstream salinity values would have occurred.

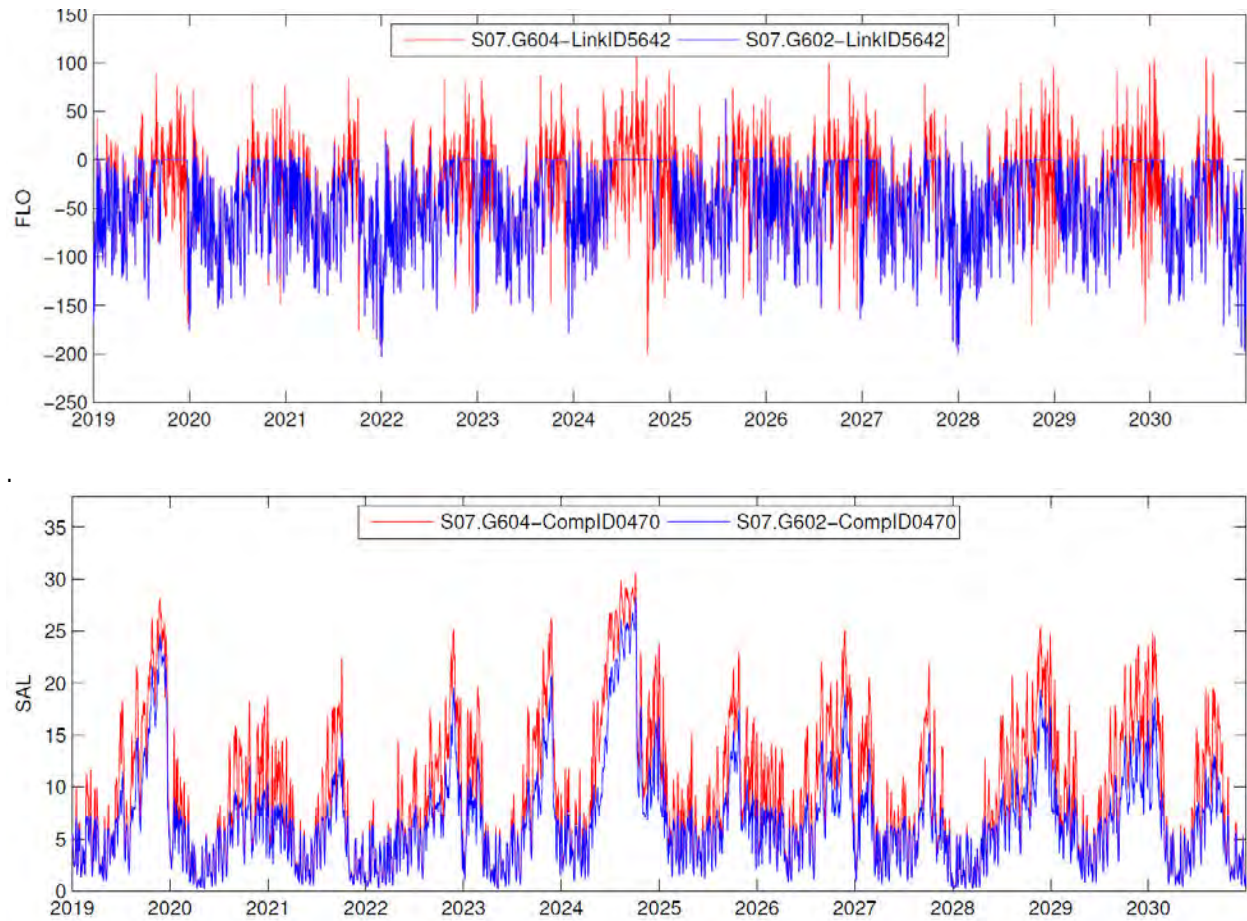


Figure 7: Daily averaged flow (m^3/s) through the model link representing the lock (top) and salinity (psu) in the upstream compartment (bottom) for the Permitted Operations (G602 – blue) compared with Surge Only Operations (G604 – red). For flow, negative values indicate southward flows, while positive values indicate northward flows.

The duration of individual closure events can be calculated from the ICM link flow data. Figure 8 shows that for the simulated period, some closures can be as long as 240 days, while closures between 30 and 60 days represent the greatest amount of total closure time.

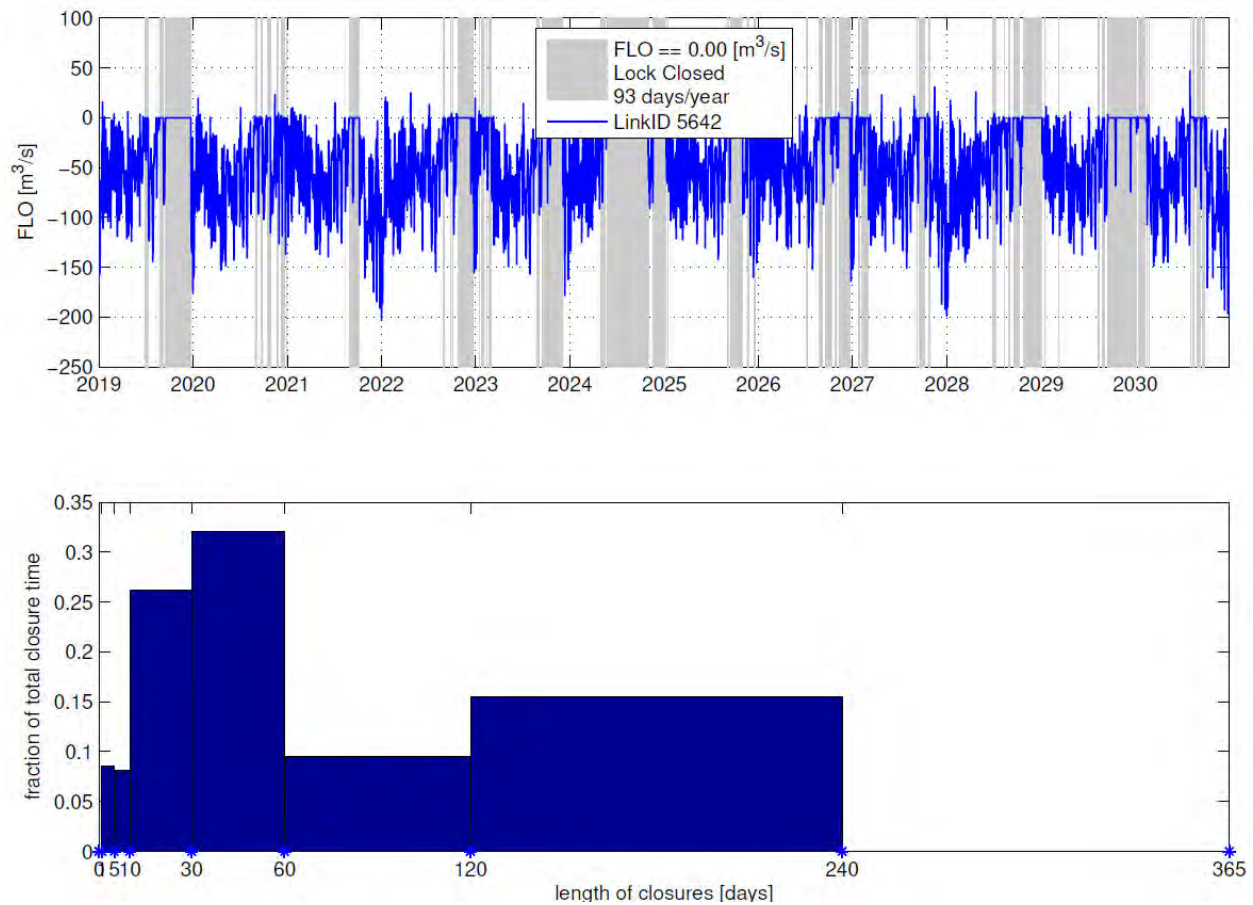


Figure 8. Plot and histogram of closures for the HNC Lock Complex based on the operations shown in Figure 7.

The purpose of the lock closure under Permitted Operations, in addition to reducing storm surge flooding, is to limit saltwater intrusion to interior areas, including the Houma water intake. As the closure varies from year to year, there is varied effect on average annual salinity in the area. As an example, Figure 9 shows the spatial extent of maximum 2-week average salinity reduction, compared to the Surge Only Operation, for a representative dry year (2024). Permitted operations generally reduce salinities in adjacent compartments; however, this reduction is limited. ICM results presented in Figure 10 compare average annual salinity for a year with little closure (2021) to one with extended closure (2024). Even when the lock is closed for much of the year (right panel) salinities north of the lock exceed 10 ppt. Figure 10 also shows regional salinity influences with apparent freshening of the Atchafalaya River inflow to the GIWW (top left) and higher salinity in Terrebonne Bay (lower right). The rationale for the salinity closure is that the HNC is a major conduit for salinity incursion to the north. However, these maps show that there are other avenues for salinity movement.

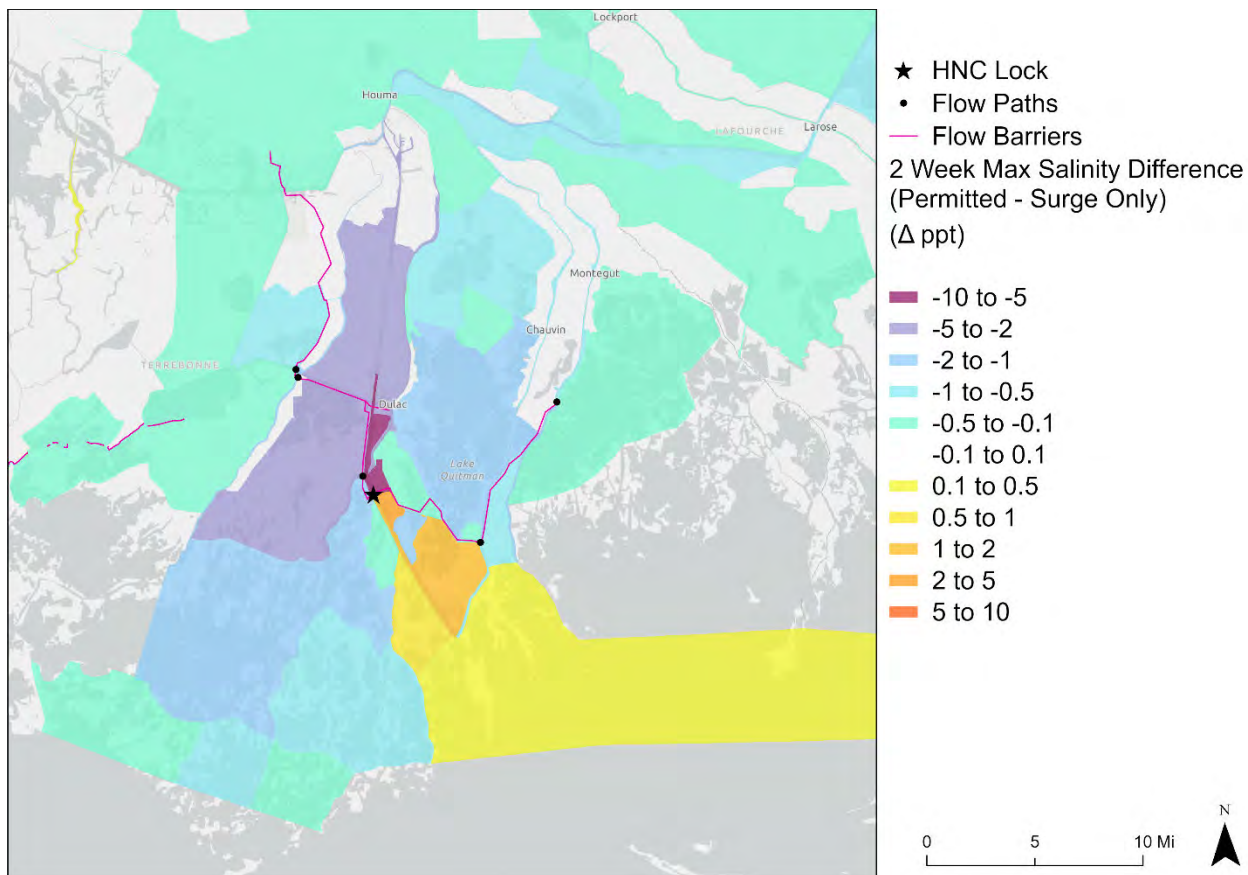


Figure 9: Maximum 2-week Average Salinity Difference between Permitted and Surge Only Operations for 2024.

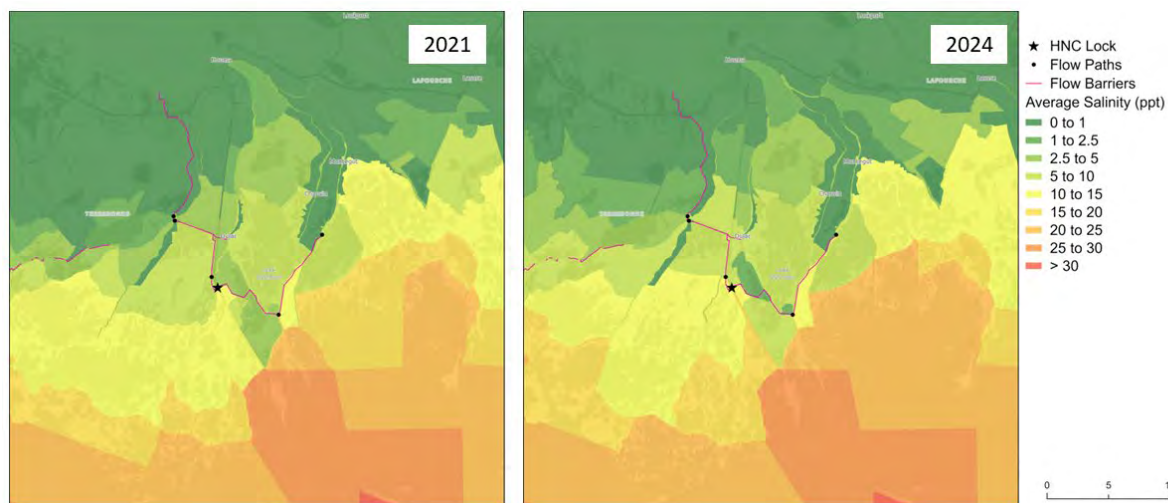


Figure 10: ICM Average annual salinity maps for 2021 (little closure of Lock) and 2024 (extended closure of Lock). The black star marks the location of the HNC Lock Complex.

Higher resolution Mike21-FM results confirm that additional pathways are capable of conveying saline waters behind the lock complex (Figure 11). This salinity influx is most apparent during HNC Lock Complex closures, but also occurs

while the lock complex is open (e.g., mid year 2025). During the extended closures in 2023 and 2024, influx through the Bayou Grand Caillou (MTG04) flowpath becomes the dominant salinity pathway for the year.

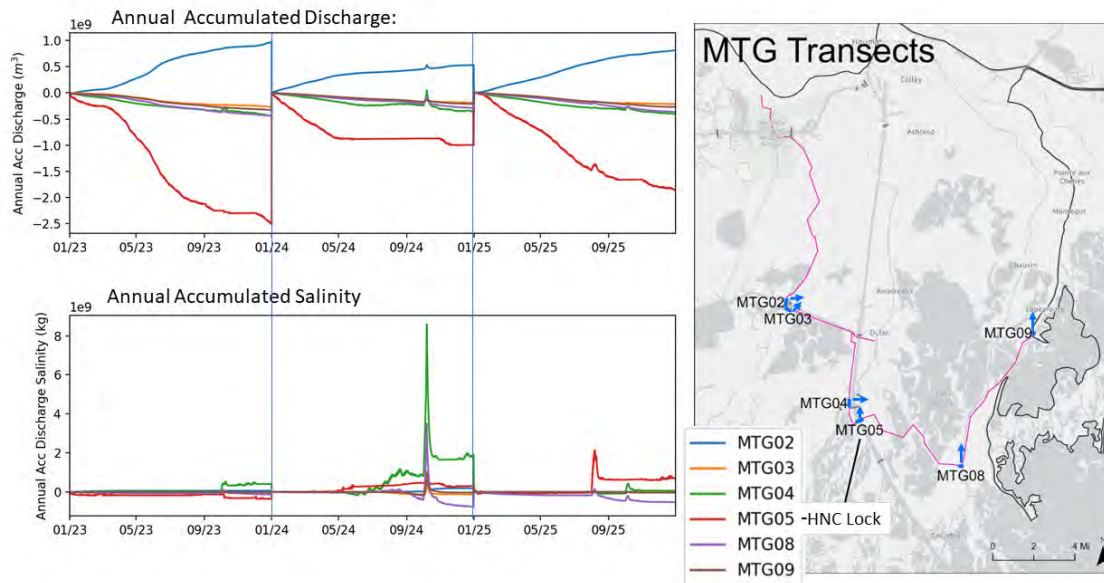


Figure 11: Annual accumulated discharge (top) and salinity (bottom) fluxes into the basin for Permitted Operations. Note that accumulated values reset to zero at the start of each year (horizontal blue lines) to better represent seasonal variations across years. Additionally, positive values indicate flow into the basin as depicted by arrows on the map.

High Flow Operations

Changing the operational rules from closure under higher salinity to closure under lower salinity changes the periods during the simulation when the lock complex is closed vs. open (Figure 12). For example, in 2024 the lock complex was closed for extended periods under the Permitted Operations (Figure 7) but remained open during High Flow Operations. The effect on upstream salinities, however, is minimal (~23 ppt when the lock complex is closed and ~26 ppt when the lock complex is open). While a change of 2-3 ppt could have substantial ecological impacts at lower salinities, the ecological benefit is likely low when salinity is already this high. Figure 12 also shows the upstream differences when it is closed for freshwater distribution. When the lock complex closes, the salinity above the lock complex becomes fresh (e.g., the early months of 2028 in Figure 12) while salinities reach ~5 ppt with the lock complex open under the Permitted and Surge Only Operations.

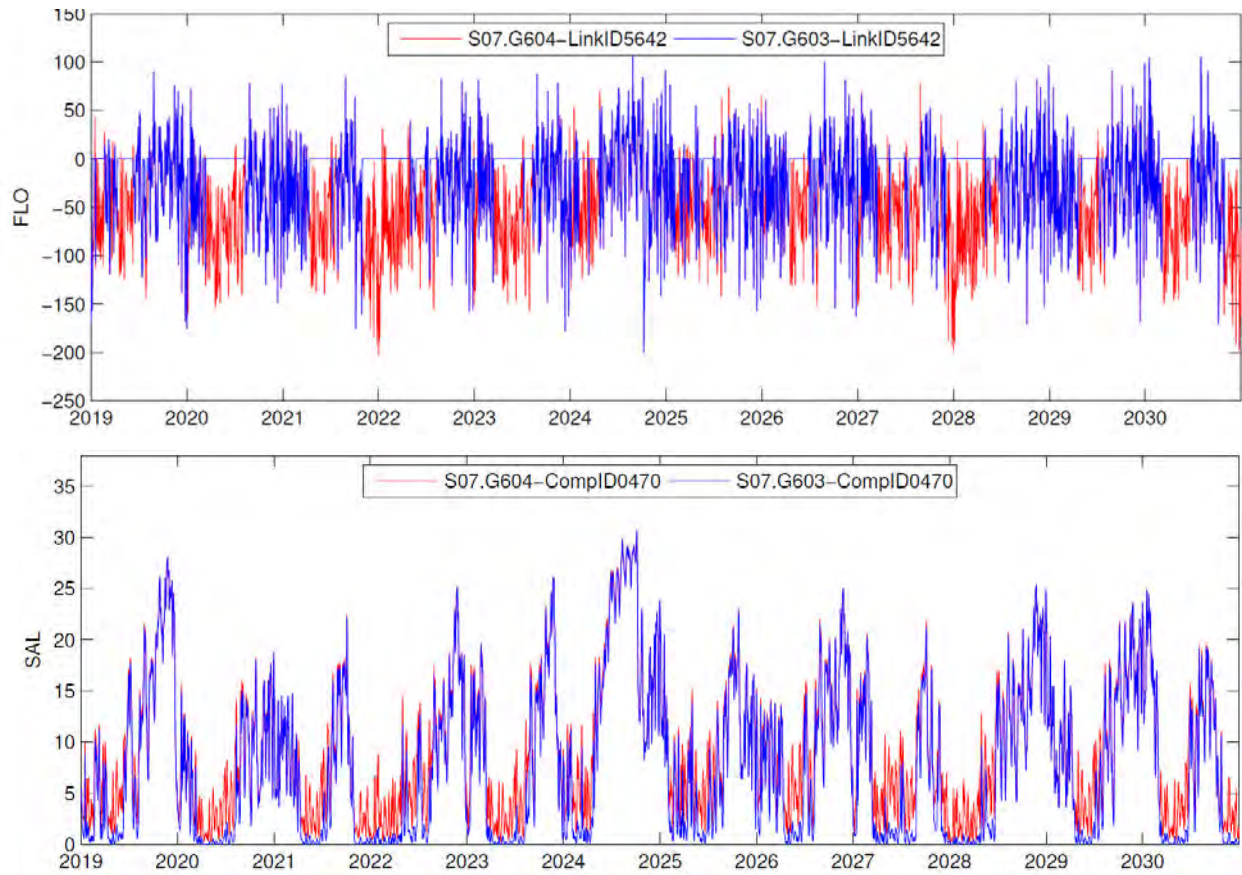


Figure 12: Flow through the model link representing the lock (top) and salinity in the upstream compartment (bottom) for the Surge Only Operations (red) and High Flow Operations(blue).

When the lock complex is operated for freshwater distribution, there is a shift in the frequency distribution of the duration of closure. Shorter duration closures, e.g., less than 30 days, make up a much smaller proportion of the time closed for High Flow Operations (Figure 13) than under Permitted Operations (Figure 8). Closures of 120-240 days account for almost 30% of the total time closed.

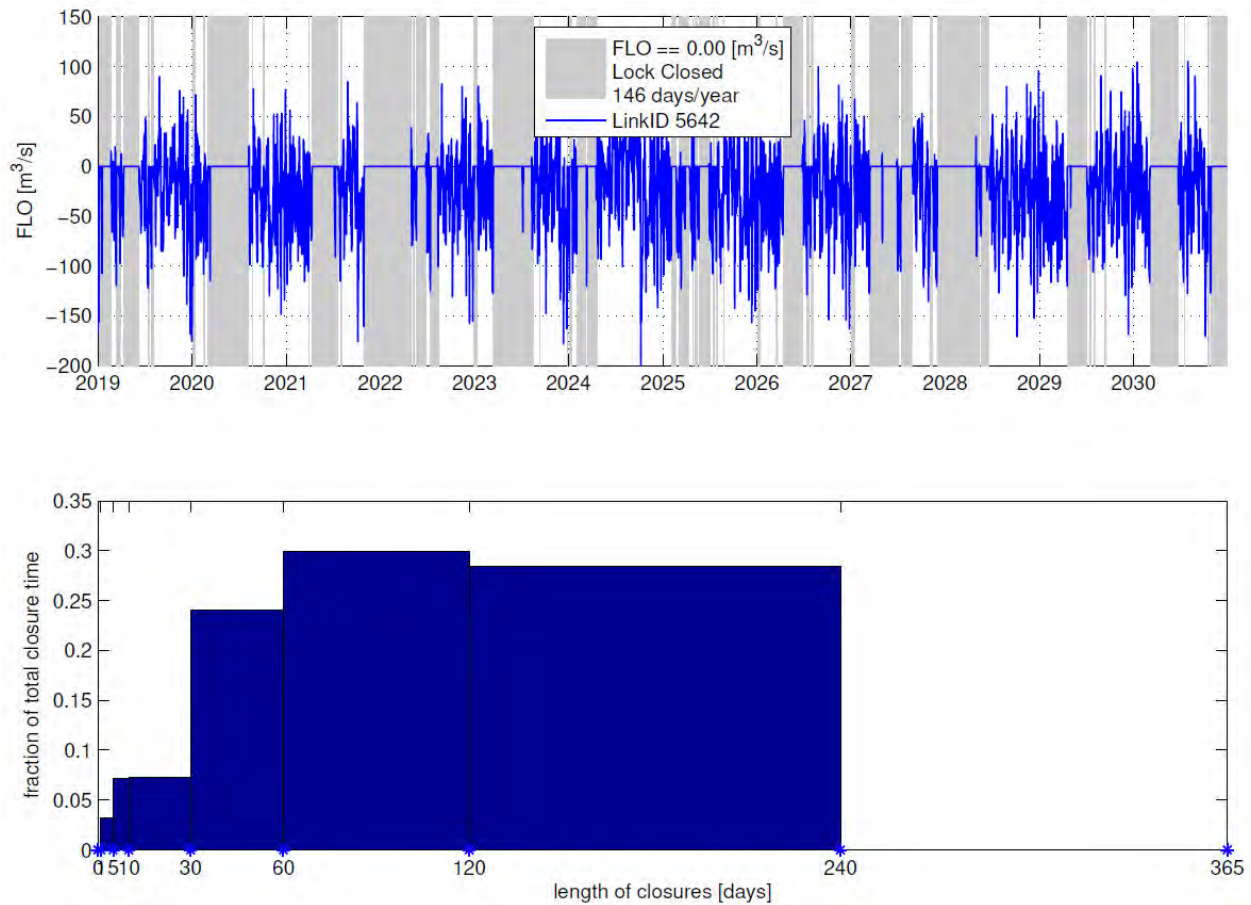


Figure 13: Plots of closures associated with Permitted Operations (top) and High Flow Operations (bottom) with a histogram of High Flow Operations HNC Lock Complex closure durations.

The intent of High Flow Operation is to move freshwater from the HNC to the basins to the east and west. There may be some concern that extended closures for this purpose could result in backwater flooding upstream of the lock. Figure 14 shows the effects of High Flow Operations (compared to Surge Only Operations) on conditions in compartments close to the lock. Results indicate a minor effect on stage immediately upstream of the lock (compartment 470). In general, any increase in stage associated with lock complex closure for freshwater distribution vs. closure for storm surges is small and of smaller magnitude than changes due to seasonal fluctuations in Gulf water levels. To the east in the Lake Boudreaux basin (compartment 514), there is a decrease in salinity during times of the year when salinity is already fairly low (e.g., mid year 2020) with more minor impacts during periods of higher salinity (e.g., late 2024). The same effect occurs west of the HNC in compartment 467 south of Falgout Canal. Figure 15 shows the widespread though minor reductions in average annual salinity inside and outside of the MTG alignment, with increases in salinity along the HNC downstream of the lock complex. While a Mike21-FM model was not run for this alternative, observed flow through adjacent gates in the Permitted Operations runs suggests that these same pathways could be responsible for conveying freshwater out to these adjacent basins.



Operations

— High Flow

— Surge Only

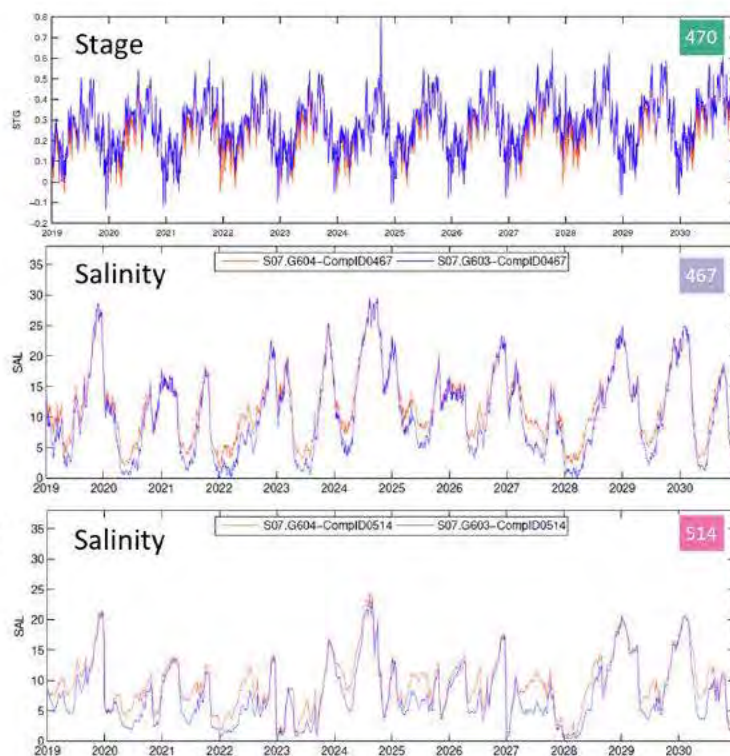


Figure 14: Comparison of stage and salinity for High Flow Operations (blue) with Surge Only operations (red) for ICM compartments near the HNC Lock Complex (blue dot).

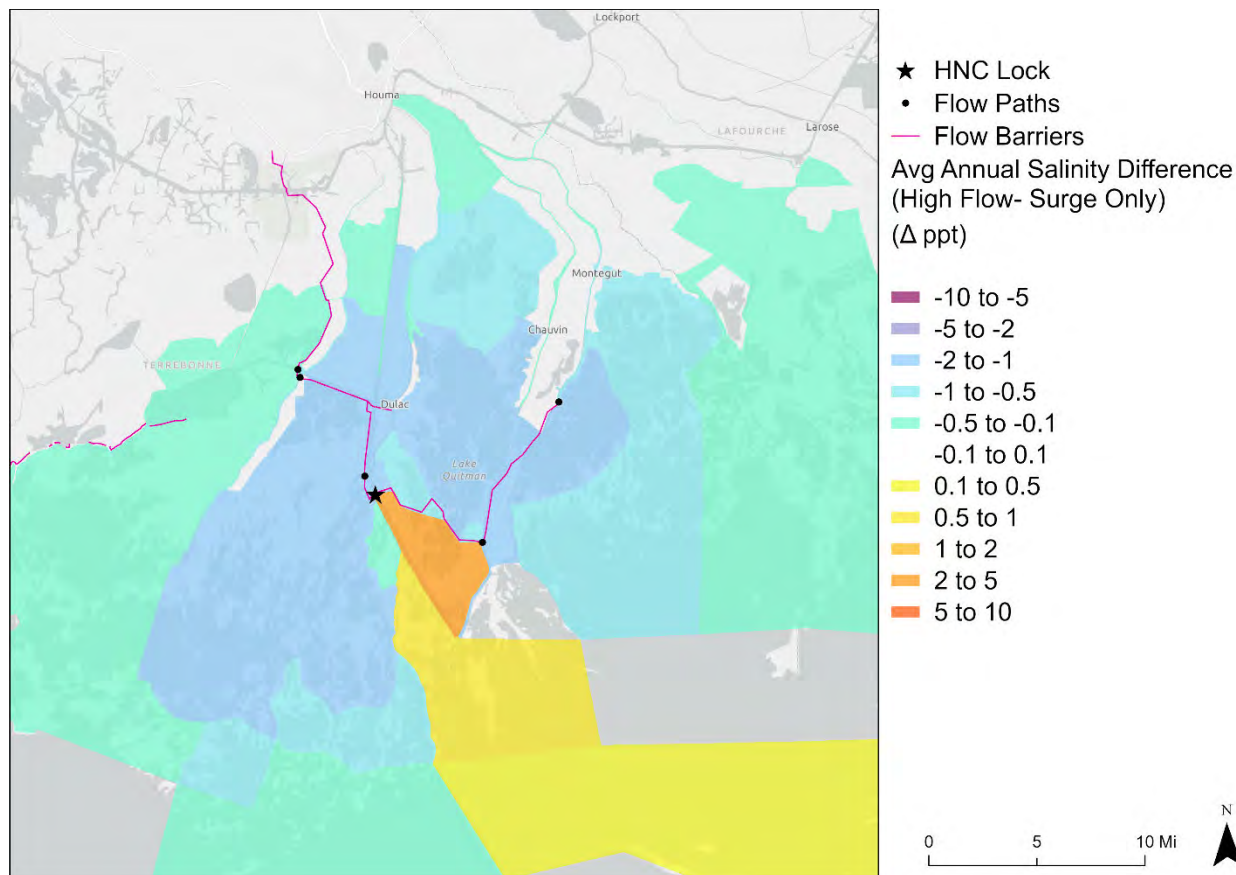


Figure 15: Average Salinity Difference between High Flow and Surge Only Operations for 2024.

The effects of these changes on the landscape and ecology of the area are muted due to the short duration of the simulation (12 years) and the relatively minor changes in salinity associated with the operations changes. The effects on land-water configuration are negligible (not shown). However, using the FFIBS (Forested, Fresh, Intermediate, Brackish, Saline) scores to reflect changing species distribution (Baustian, et al., 2020), it is possible to see some changes in vegetation composition between the two runs. Figure 16 plots FFIBS scores for the end of the simulation period for Surge Only and High Flow Operation and highlights two areas where changes are apparent in the Lake Boudreaux basin (compartment 514). In the northern part of the basin, there is more intermediate marsh under High Flow Operation compared to brackish marsh under Surge Only Operations. In the southern area, the difference is between more brackish vs. more saline. Both of these changes reflect freshening of conditions in the basin and the response of vegetation.

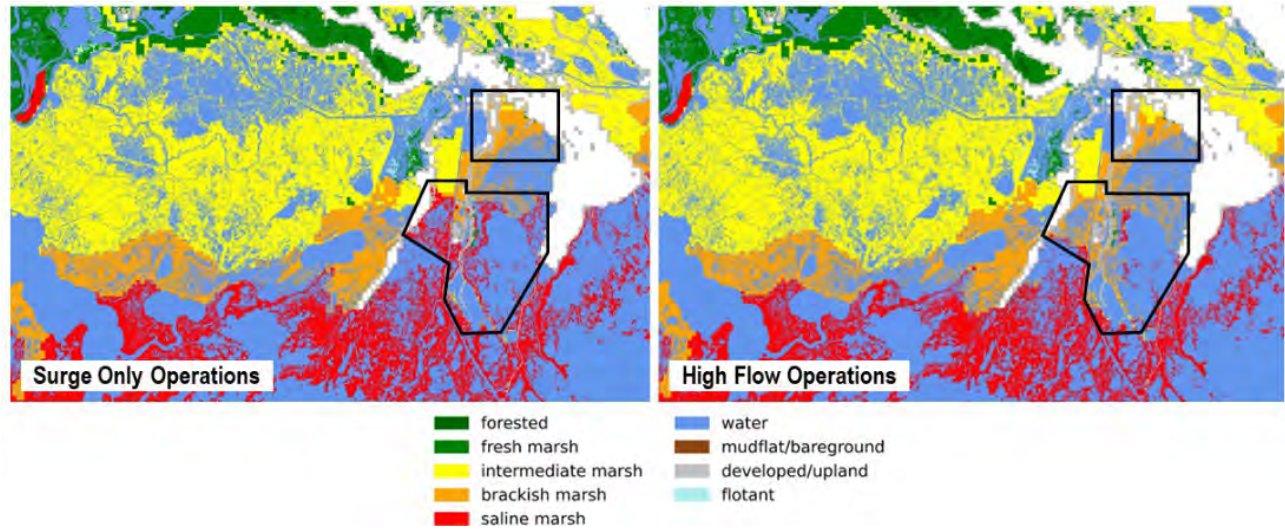


Figure 16: Vegetation cover as indicated by FFIBS scores for Permitted Operations and High Flow Operations at the end of the simulation.

4. Conclusions and Recommendations

This analysis uses Surge Only Operations to reflect the current conditions on the ground where the Bubba Dove Floodgate is closed during storm surge. The results show the Surge Only Operations have little effect on salinity in the basin. However, it is important to note that only the HNC Lock Complex was operated during the simulated surge and other gates and structures within MTG would also be operated. Nevertheless, the Surge Only Operations do provide a baseline for comparison of alternative operations for future management of salinity and for ecosystem benefits.

Analysis of the Permitted Operations, which are designed to protect the Houma water supply from saline intrusion, show only slight reductions in upstream salinity peaks when the HNC Lock Complex is closed. This is a result of the multiple alternative flow paths for saline waters, e.g., Bayou Grand Caillou. Furthermore, the Permitted Operations, for the boundary conditions simulated, often result in closures of more than 30 days. During these periods, the floodgate would be closed and navigation traffic would need to use the lock. To provide more effective prevention of salinity intrusion, other structures in MTG would need to be closed, some of which may not have locks to allow navigation.

The High Flow Operation of the HNC structure did have the intended effect of distributing fresh water to the adjacent basins. The reduction in salinity was widespread but muted under the conditions simulated. There are several reasons for this. There are multiple avenues for saline incursion, even inside MTG as shown under Permitted Operations analysis here. Further, the structure was operated when the salinity at the HNC Lock Complex was low and it was already quite low in the surrounding area. As noted for the Permitted Operations, the effects of salinity in some areas, e.g., the Boudreaux basin, could potentially be increased, i.e., a greater salinity reduction could be achieved, if other structures in MTG were operated to reduce salinity incursion, e.g., Bayou Petit Caillou or Bush Canal structures. However, even over the relatively short period simulated, the salinity reductions in the Boudreaux basin, which extended as far east as Bayou Terrebonne, were seen to have some effect on vegetation in the ICM-LAVegMod results. In the ICM, retaining fresher marshes and reducing salinity impacts land loss by increasing organic accretion in soils and increasing the inundation depth at which land loss occurs. The benefits of such effects on land loss may only be realized in later decades when sea-level rise and subsidence further stress marshes.

This analysis has shown the potential for alternative operations of the HNC Lock Complex to produce ecosystem benefits, even without the operation of other structures or the addition of additional restoration projects, such as TE-110. It has also shown how 'numerical experiments' can be used to test hypotheses about various operational schemes

and produce information important to operational decisions, such as duration and frequency of floodgate closure and effects on water levels. Further analysis is recommended using tools such as the ICM, which enables examination of ecosystem benefits and has the flexibility to implement different types of flow rules, and Mike21-FM, which provides more detail on hydrologic flow paths and dynamics. Concepts to be explored could include:

- Further exploration of operating the HNC Lock Complex to limit saltwater intrusion vs. distribution of freshwater including:
 - o Consideration of the role of other structures in MTG in meeting either salinity or ecosystem goals
 - o More explicit exploration of under what conditions salinity is a concern at the Houma water plant, and how HNC Lock Complex operations mitigate those conditions
 - o Optimizing operations across different structures to achieve goals while limiting impediments to navigation, including analyzing information on traffic use patterns through the main waterways
- Examination of HNC Lock Complex operation for ecosystem and water supply benefits in relation to other restoration efforts including:
 - o Interactive effects with TE-110 and/or the Atchafalaya Diversion which seeks to move freshwater into the Penchant Basin, potentially influencing salinity incursion from the west/southwest into the MTG system
 - o CMP 2023 restoration projects that seek to influence freshwater-salt dynamics in western Terrebonne including Western Terrebonne Hydrologic Restoration, Central Terrebonne Hydrologic Restoration, and ridge restoration projects on Mauvais Bois, Bayou De Cade etc.

It is important to recognize that the HNC Lock Complex operates within a system that is subject to changes both due to dynamic environmental conditions and investments in restoration, and such exploratory model runs can inform the State of Louisiana and local MTG managers how this important structure on the HNC can produce multiple benefits for the community and the ecosystem.

5. References

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Document Verification

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Document sub-title	–
Document ID	Memorandum 01
Status	Draft
Date	November 16, 2022
Project number	220800
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Revision	Description	Issued by	Date	Checked
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From: [MVN Environmental](#)
To: [Carnes, Laura M CTR \(USA\)](#)
Subject: FW: New Orleans District Contact Form: SMART Transportation System for Construction
Date: Thursday, January 22, 2026 10:17:49 AM

Message:

My name is Matt Schultheis. I am a Louisiana-based construction logistics professional and the founder of HAULR, a logistics platform designed for large civil infrastructure and levee projects. Projects like Morganza to the Gulf face continued cost escalation from inflation, engineering refinement, environmental mitigation, and long construction timelines, and one of the largest remaining opportunities to reduce cost and accelerate completion lies in how borrow material hauling is managed. Borrow material is a commodity; whether sourced from Corps-controlled areas or private borrow pits near the alignment, material costs are similar. Cost growth is driven by logistics inefficiencies such as dispatch delays, idle time, unverifiable quantities, long haul distances, and contractor risk premiums. HAULR enables project owners to directly manage hauling through real-time dispatch, load tracking, materials quantity verification, and progress tracking by reach.

MTG SEIS Comment

Ref Id: aS-gZ3m8R0uGE_d_IxSmezA

Public Comment – Morganza to the Gulf Project (Draft SEIS)

My name is Matt Schultheis. I am a Louisiana-based construction logistics professional and technology founder with experience supporting large civil infrastructure and levee projects.

Large hurricane protection projects such as Morganza to the Gulf face continued cost escalation driven by inflation, evolving engineering requirements, environmental mitigation, and long construction timelines. One of the most significant remaining opportunities for cost reduction and schedule acceleration lies in how borrow material hauling is managed.

Borrow material itself is a commodity. Whether sourced from seasonally available Corps-controlled areas such as Bonnet Carré or from privately owned borrow pits located near the alignment, the unit cost of material is largely the same. What drives cost growth is not the dirt, but the logistics—dispatch inefficiencies, idle time, unverifiable quantities, long haul distances, and conservative risk premiums embedded in contractor pricing.

Morganza is a nearly 100-mile linear system that necessarily relies on multiple borrow pits close to active reaches as construction advances. Coordinating those sources efficiently is essential to controlling cost and maintaining schedule.

HAULR is a construction logistics platform designed to give project owners real-time visibility and control over hauling operations. By enabling real-time dispatch, load tracking, materials quantity verification, and progress tracking by reach, HAULR allows owners to directly manage the logistics layer that most strongly influences cost escalation and schedule delay.

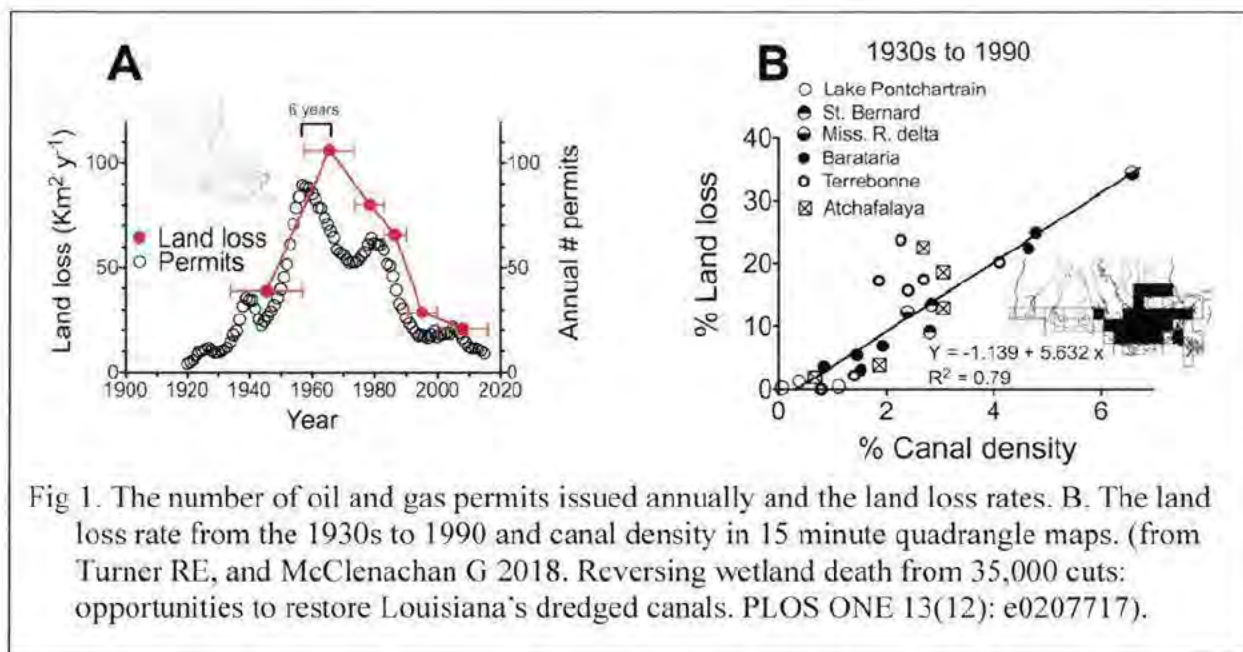
Owner-side use of systems like HAULR can reduce inefficiency, improve productivity, and shorten construction timelines, while also strengthening audit defensibility and cost certainty. In addition, deploying such systems supports local economic development by enabling participation from local trucking operators through transparent, efficient, and predictable hauling workflows.

This comment is offered in the context of feasibility and cost realism, not procurement. I encourage the Corps to consider owner-side logistics systems such as HAULR as a practical tool to reduce costs, accelerate completion of levee construction, and support local economies over the life of the Morganza to the Gulf project.

Thank you for the opportunity to comment.

1. Indirect effects flood protection measures are *vastly* underestimated for *inside* the levees

The report (p. 213) does not recognize that land loss is declining (Fig. 1A), and uses a 28 year old 1998 report as an authoritative documentation of present/future conditions. The reason for the decline is the parallel decrease in dredging canals which creates a smaller levee than proposed in this draft document. The effects of building levees is exceeded by indirect effects which are not acknowledged, much less considered. Wetlands inside the levee will turn to open water because: continuous levees create hydrologic stressors on the wetland plants as a result of a) soil waterlogging and drying, b) less organic matter and sediment accumulation, or c) greater erosion. The indirect effects are demonstrated in a robust dose-response manner between coastal land loss and dredged canals in the Mississippi and Niger river deltas over 60 years (Turner and Ohimain 2024). Importantly, the ratio of land loss to canal area increases with time – a legacy effect; there are 6 acres of land loss per 1 acre of canal (Fig. 1B; 1934 to 1990). Flood protection levees on the main channel did not magnify the effect of dredging on wetland loss by inhibiting sediment flow into adjacent wetlands along its banks. Virtually all of Louisiana's land loss is due to the spoil bank levees built by dredging canals, hence the zero intercept in Fig. 1B. Building levees will cause wetland loss inside the levees – a lot of it. Billions of dollars of restoration monies are compromised by the proposed hurricane protection levees.

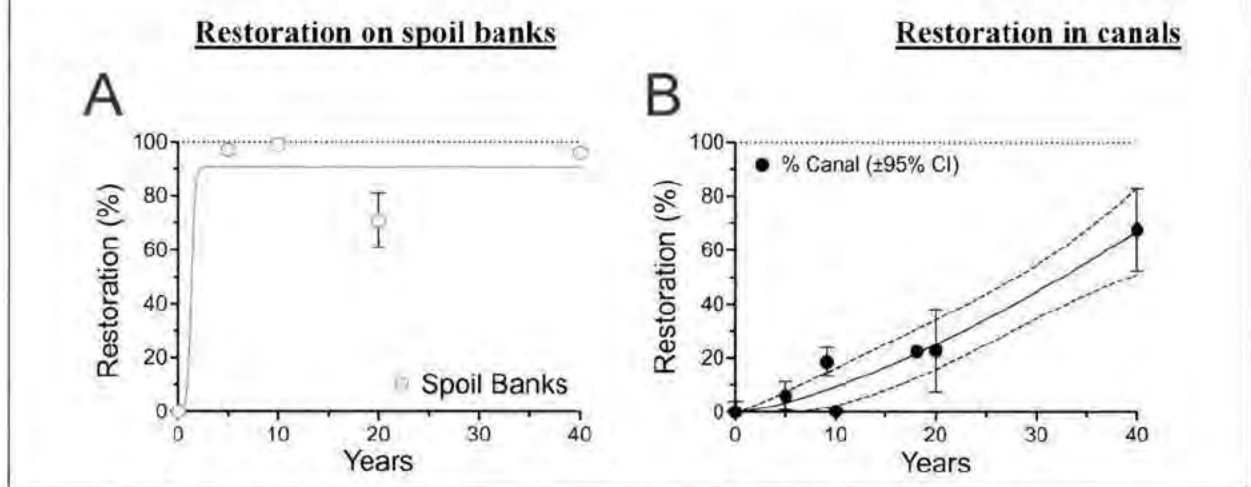


2. Deconstructing canal levees is a less expensive and effective option for mitigation *outside* the levees

Appendix A figures indicate that sediments from other borrow areas will be re-located to marshes/open water as the main mitigation method. Re-vegetation of canal+spoil banks built dredging canals were examined to determine restoration success. Sixteen of the 33 disturbed

areas are now mostly restored to wetlands, and seventeen were compromised by re-dredging and other factors such as being surrounded by other canals or embedded within water level control structures. Success occurred where the natural hydrology was not artificially constrained by these structures. The spoil bank was restored wetland habitat within a few years, and the open water of the canal was 70 percent re-vegetated after 39 years if there was no soil 'plug' placed at the canal entrance during backfilling (Fig. 2). Backfilling canals can be done on the 27 thousand abandoned canals across this coast for a low cost compared to other restoration strategies (Turner 2022). The wetland restoration increases fish nursery habitat, coastal wetland quality, sediment accretion and storm protection. An example is in Fig. 3. This method of wetland restoration can be done quickly, prevents future wetland loss, and is highly cost effective compared to the

Fig. 2. Restoration on spoil banks (A) and in canal (B) vs years since backfilling. A) After two years there is an 90% restoration of vegetation on the spoil bank. The data were fit using Prism's Sigmoidal, 4PL regression analysis where X is years with a Least squares fit for the relationship between years since backfilling and % restoration on the spoil bank. B) A simple linear regression of log(x) and log(y) of the %restoration in the canal, together with a 95% confidence limit. The data are from backfilled canals discussed in Turner (2022).



uncertain outcomes of the mitigation choice made. The benefits increase over time.



Fig. 3. A canal backfilled in 1981 is outlined in yellow. Compare the area of vegetation in the canal and the spoil bank vegetation on the former spoil bank with the area of vegetation for the canal to the left that was not backfilled.

3. The study is incomplete, but work is apparently underway?

p. 20: In main document says: “Any measure that would adversely impact cultural resources, wetlands, threatened and endangered species, oyster seed grounds, existing pipeline leases, or that contained hazardous, toxic, or radioactive waste or substances based on federal and state databases *was screened from further consideration.*” Yet later they say on page 213: “Because of the large size of the MTG Project, the USACE as lead federal agency *has not yet fully determined the location of historic properties*, or how the Proposed Action may affect these historic properties” (italics added)

4. Fault zones are not discussed in the document.

Geological fault zones are found throughout the coastal zone. Yet there is no discussion about where they are in relationship to the levees and the risk of faulting in comprising levee integrity.

References

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From: noreply@dma.mil
To: [MVN Environmental](#)
Subject: New Orleans District Contact Form: Morganza comments
Date: Friday, January 23, 2026 7:29:36 PM

Message:

The historical mapping for the Morganza Project is inaccurate & does not reflect the 1800s documented history of the United Houma Nation. In contrast, the Isle de Jean Charles, Grand Caillou/Dulac, Pointe-au-Chien, & Lafourche Band of Indians were organized in the mid-1990s. Any suggestion otherwise misrepresents the historical record of our Houma People.

Indian mounds have no connection to federal recognition. They are sacred Indigenous sites of cultural, historical, & spiritual significance & must be protected regardless of fed status, incl. protective measures such as ring levees.

The Morganza Project began on Island Road, but later shifted, leaving behind a living community that still depends on these lands and waters & has a business. Land loss was not caused by our people, but by levees, MS River alterations by the U.S. Army Corps of Engr., & decades of oil and gas activity imposed w/o adequate mitigation. Federal recognition is irrelevant to these impacts & responsibilities.

MTG SEIS Comment

Ref Id: tgKl49VZTkixyOJ3zlXGOA

To: MVN Environmental <MVNEnvironmental@usace.army.mil>

Subject: [Non-DoD Source] Comments on MTG SEIS

The project in its current configuration is a COLLOSAL waste of money. There are nowhere near the flood damage reduction benefits of the miles and miles of parallel levees and floodgates on the outlying bayous to justify the cost of this part of the project. Protection of the City of Houma proper is justified but its excess benefits should not be used to allow the outlying levees and floodgates. The project should be reduced to just a levee, floodgate and pump station(s) for the City of Houma.

However, low-level levee barriers and barge-type floodgates are an effective means of blocking saltwater to the existing healthy marsh behind the outlying levee alignments. Floodgates should not be the currently proposed sector-type gates that are very expensive relative to barge gates (this should be considered for the current project plan as well). Such reduced level levee and gates for environmental enhancement is not currently authorized solely for this purpose in the current project and would need additional specific authorization.

Francis Vicidomina, PE, CVS
Metairie Louisiana

From: [MVN Environmental](#)
To: [Carnes, Laura M CTR \(USA\)](#)
Subject: FW: New Orleans District Contact Form: Re: Goal Posts
Date: Thursday, January 15, 2026 7:48:33 PM

CAUTION: Your email client may display clickable links. The data in this email is provided without modification, as the user entered it. Before you click or use any link provided in this email, please confirm the authenticity of the link.

This message was sent from the New Orleans District website.

Message From: Michael Wynne

Phone:

Location (City, State, Zip):

Response requested: No

Message:

Looks to me you minimize the induced flooding impacts of the proposed work by starting with the existing non-federal levee system as non-project alternative. So when you calculate the “with project” alternative’s impact on water levels outside the levee, you are identifying the increase in surface water elevation as compared from the existing system (12-15 ft generally) to the final lifts. This appears to be a segmenting problem. The quantitative impact of the non-federal levee system on induced flooding should be evaluated under the updated models, along with the increases with the betterments from the proposed project lifts.

MTG SEIS Comment

Ref Id: 7BlmSIWuX0yAGiNvllkthQ

Part 7: USACE Responses to Public Comments on Draft SEIS

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1 Introduction

A Notice of Availability for public review and comment of the draft SEIS for the 45-day public review and comment period (December 5, 2025 through January 23, 2026) was published in the *Federal Register* and provided to cooperating agencies, the public, and interested parties on December 5, 2025 (see Appendix L, Part 4 for the Notice of Availability). The notice provided a description of the Proposed Action features, points of contact to obtain more information regarding the draft SEIS, and methods for commenting on the draft SEIS. The public review commenting period was announced by CEMVN on the project website, Facebook, Instagram, and through media outlets. The public was invited to comment on the proposed project in any of the following ways:

- Email to: mvnenvironmental@usace.army.mil;
- Electronically to:
<https://www.mvn.usace.army.mil/About/Projects/Morganza-to-the-Gulf/Documents>;
- Comment card at public hearings;
- Verbally via court reporter at public hearings; and
- Mail to U.S. Army Corps of Engineers, New Orleans District.

1.1 Public Hearings

CEMVN conducted six public meetings to provide an overview and answer questions about the project, and to solicit and receive comments. See Appendix L, Part 5 for a copy of the power point presentation slides presented at the public hearings. The dates, times, and locations of the public hearings were as follows:

- January 8, 2026, 2:00 pm: Dularge Gym, 1330 Dr. Beatrous Road, Theriot, Louisiana
- January 8, 2026, 4:00 pm: Dularge Gym, 1330 Dr. Beatrous Road, Theriot, Louisiana
- January 15, 2026, 2:00 pm: Barry P. Bonvillian Civic Center, 346 Civic Center Boulevard, Houma, Louisiana
- January 15, 2026, 4:00 pm: Barry P. Bonvillian Civic Center, 346 Civic Center Boulevard, Houma, Louisiana
- January 20, 2026, 2:00 pm: Student Union Addition, Nichols State University, 103 Leighton Drive, Thibodaux, Louisiana

- January 20, 2026, 4:00 pm: Student Union Addition, Nichols State University, 103 Leighton Drive, Thibodaux, Louisiana

1.2 Summary of Public Comments Received

Over the 45-day public comment period, CEMVN received 35 comment submissions from individuals, state and federal agencies, businesses, and organizations. CEMVN reviewed, sorted, and responded to each comment submission. All public comments in their entirety have been made part of the project administrative record and are provided in Appendix L, Part 6 organized in alphabetical order by last name for ease of reference. Comments that were submitted by agencies or organizations (identified by those comments submitted with formal signatures or letterheads) are named by the agency or organization rather than an individual's name.

CEMVN responses to comment submissions are provided in Sections 2 through 27. Responses are organized by topic under each commenter's name, agency, business, or organization.

2 Apache Louisiana Minerals LLC (Allen, Timothy)

2.1 Topic: Real Estate, Borrow and Mitigation Sites

Comment Summary: Apache Louisiana Minerals LLC (ALM) owns and manages over 270,000 acres of coastal land in Louisiana. We object to any borrow sites and marsh creation areas proposed on Apache's fee title acreage without further discussion and collaboration with us. Specifically, borrow site A214 on page 7 of Part 2: Map Series of Proposed Borrow Sites and Access Routes (map attached) and the Lake Mechant borrow site and marsh creation areas and borrow areas in the vicinity of Madison Bay and Lake Tambour on pages 6 and 7 of Part 3: Map Series of Proposed Habitat Mitigation Sites (maps attached)

USACE Response: USACE acknowledges ALM's ownership interests and the request for direct coordination regarding any proposed use of ALM lands. The borrow and mitigation areas depicted in the Draft SEIS represent planning-level footprints intended for environmental analysis and do not constitute final site selection. Prior to identifying any borrow or mitigation site for construction, USACE and the non-federal sponsor (NFS) will conduct detailed real estate investigations and engage directly with affected landowners. No borrow or mitigation activities will occur on private lands without appropriate real estate agreements. ALM's request for continued coordination will be incorporated into future design and real estate acquisition processes.

3 Bayou Lafourche Band of Biloxi-Chitimacha Indians

3.1 Topic: Compensatory Habitat Mitigation

Comment Summary: Mitigation projections do not include enough detail regarding mitigation to sites outside of the protection levee that will be impacted. This concern is one that must be addressed. Canal backfilling is a viable mitigation solution that should be considered to both add environmental protection and mitigate the impacts of this project.

USACE Response: The USACE considered canal backfilling as a potential mitigation feature. However, in general, existing spoil banks adjacent to the canals were not found to have sufficient material to achieve target marsh elevations during backfilling. As such, other sources of material would be required to achieve target elevations, which would have increased costs compared to other more cost-efficient solutions. Additionally, since construction of backfilling opportunities resulted in additional impacts to marsh from transportation of additional material and since such projects were highly susceptible to erosion (being narrow, long, linear features), canal backfilling opportunities were not considered cost efficient and were not included as features of the mitigation projects.

3.2 Topic: Tribal Resources

Comment Summary: Culturally historic sites have not been included in the protection or acknowledged as part of the planning process. Project maps do not acknowledge the existence of historical sites belonging to several Indigenous American tribes. The degradation of land outside of these levees will be exacerbated by the building of this project, which will threaten these sacred sites. These sites must be protected. The tribal communities from these areas are willing to engage with project managers to ensure that these sites are protected to the best of our ability.

USACE Response: USACE thanks you for your comment. The likely or known existence of cultural resources is presented in Section 5.16 and elsewhere in the document. The location or significance of known cultural resources is not shared in a general-public document so as to protect these resources from those who may use information to harm the resources in accordance with Section 304 of the National Historic Preservation Act, 54 U.S.C. 307103 , and 36 CFR 800.11 (c). No specific “ownership,” if known or claimed, of the cultural resources is discussed in the document, for similar reasons. USACE has formulated a Programmatic Agreement that stipulates measures concerning known or discovered cultural resources, according to the National Historic Preservation Act, including consultation and coordination of findings and effects.

3.3 Topic: Tribal Resources

Comment Summary: The First People's Conservation Council represents several state recognized tribes. Coastal tribes, including The Bayou Lafourche Band of Biloxi-Chitimacha Indians, Isle de Jean Charles Choctaw Nation, Grand Caillou/Dulac Band of Biloxi-Chitimacha Choctaw, Grand Bayou Village of Atakapa-Ishak/Chawasha, and the Pointe-au-Chien Indian Tribe have both ancestral territory and current locations of communities that are largely excluded from the protections and have not been consulted regarding the impact to culturally and environmentally significant sites. The First People's Conservation Council is willing to act as a liaison to the tribes and requests that the Army USACE of Engineers engage in conversation concerning the impact to our people.

USACE Response: USACE thanks you for your comment. Some engagement with these state recognized tribes has already occurred. For example, USACE engaged with the Grand Caillou/Dulac Band of Biloxi-Chitimacha-Choctaw, Pointe-au-Chien, and Grand Bayou Indian Village state recognized Tribes and the Office of Community Development about Proposed Action on 8 May 2023. USACE then notified all state recognized Tribes within the watershed of the public scoping meetings held on July 2023. The meeting documented comments from only two state recognized Tribes within the watershed, the United Houma Nation and the Grand Caillou/Dulac Band of Biloxi-Chitimacha-Choctaw. Representatives from both state recognized Tribes stated their interest in being informed of the proposed borrow pit locations and construction traffic routes so they could communicate the information to their Tribal members. USACE later provided notification to all above mentioned state recognized Tribes regarding the release of the draft EIS document and the multiple public meetings held throughout January 2026. However, in response to your request, USACE welcomes the opportunity to have a discussion with the First People's Conservation Council, representing the state-recognized tribes within the project area. In addition, based on comments received, USACE will extend an opportunity for additional conversation about the project and potential impacts to the United Houma Nation.

4 Billiot, Jesse

4.1 Topic: Levees and Geotechnical Stability

Comment Summary: The commenter raises site-specific levee stability and erosion concerns. We need to make sure that we push for projects that increase the growth of vegetation along the levee to ensure the levees survive future storms and erosion from salt water.

USACE Response: Geotechnical and hydraulic investigations will provide site specific information, and our analysis will evaluate localized scour, foundation

behavior, and lateral stability adjacent to levee reaches. Where needed, countermeasures—such as armoring, vegetative cover, or flow-deflection features—will be incorporated into final designs before construction and in accordance with USACE Operations, Monitoring, Repair, Replacement, and Rehabilitation (OMRR&R) guidance.

4.2 Topic: Operations, Access and Traffic

Comment Summary: The commenter reports on construction traffic and hauling issues on local routes. Some of the dump trucks speed throughout their routes and no one knows who owns them. A registry or liaison would help.

USACE Response: For levee construction currently being conducted by the NFS, construction traffic management is the responsibility of the NFS and construction contractors. USACE will share this concern with the NFS so they may consider implementing additional safety measures, such as contractor briefings, signage, or designated points of contact for reporting traffic-related issues. These measures can help ensure safe operations during construction activities. For future MTG construction activities, USACE will also implement safety measures, such as contractor briefings, signage, or designated points of contact for reporting traffic related issues to help ensure safe operations during construction activities.

5 Billiot, Jody

5.1 Topic: Levees and Geotechnical Stability during Operations

Comment Summary: Concerned about the stability of the levees near the lower end of Pointe-aux-Chenes where Bayou Point-aux-Chenes meets Cut off Canal. At this location, there is a canal that runs along/borders the levees that we've measured as having a depth of 45 feet. The current is so strong that it is continuously widening. We are concerned that the ongoing erosion could undermine the stability of the levee. Is some vegetation or another structure needed to protect that levee in this area?

USACE Response: The overall stability of the levee will be analyzed depending on the geometry of the adjacent canal and its distance from the levee. Where needed, countermeasures for erosion control such as armoring, vegetative cover, or flow-deflecting features will be incorporated into final designs to ensure resilience and integrity of the levee.

6 Bourg, Connie

6.1 Topic: Geotechnical Stability, Borrow Sites

Comment Summary: The commenter expresses concern that the number of borrow pits in flood-prone areas may undermine the very areas the project is intended to protect. Commenter suggests that borrow pits should not be located in flood-prone areas.

USACE Response: Borrow site selection follows USACE engineering criteria to ensure that excavation does not adversely affect levee performance or regional flood risk. During final design, each borrow site will undergo detailed geotechnical investigation to confirm suitability. Borrow areas will be selected and configured to preserve levee and foundation integrity, with minimum offsets, depth limits, side-slope stability analyses, and post-excavation grading. Requirements will be refined during final design with the NFS and landowners; monitoring may be implemented where warranted.

7 Brien, James

7.1 Topic: Reach A, Real Estate, Structures

Comment Summary: My family owns property at 716 Bayou Dularge Road Houma, LA 70363. This property has been in our family for three generations and is currently in an ALA-KTS Properties, LLC. The Parcel # is 39911 and this parcel connects with #39930 which we own as well. We have a recreational navigable canal that runs through, that starts from the rear of parcel 39911 to access parcel 39930 to hunt and fish. Reach A of the levee system will cross parcel 39911 and block navigational access. Request that an operable floodgate be installed at 716 Bayou Dularge Road to maintain access.

USACE Response: The scope of the current SEIS does not include construction of Reach A. The commenter's request for a navigable, operable floodgate to maintain access between parcels 39911 and 39930 will be considered during the development of design and environmental compliance for Reach A, anticipated to occur in the 2027 timeframe.

8 CPRA

8.1 Topic: NEPA Process

Comment Summary: We encourage USACE to find efficiencies where and when possible, by relying on the analysis of this SEIS and tiering any future supplemental EPA/environmental documents by incorporating the SEIS analysis per Part 3.5 of the DoD NEPA Implementing Procedures. The preparation of supplemental EISs (or other NEPA/environmental documents) takes time and

additional funding authorizations to complete. If the need to supplement is triggered, but the proposed changes and new impacts are not significant, USACE should consider preparing an environmental assessment/finding of no significant impact (EA/FONSI), as outlined in Part 3.7 of the DoD NEPA Implementing Procedures.

USACE Response: The USACE concurs. The SEIS incorporates the most recent designs available from USACE engineers with the intent of fulfilling NEPA requirements to the extent possible to avoid the need for supplemental EAs in the future. However, some reaches of the Morganza to the Gulf system are at preliminary design stages, and therefore, designs and associated environmental impacts are subject to change. If the need to supplement is triggered, but the proposed changes and new impacts are not significant, USACE would consider preparing an EA/FONSI, as outlined in Part 3.7 of the DoD NEPA Implementing Procedures.

8.2 Topic: NEPA Process

Comment Summary: If required, USACE should state in this SEIS why it is appropriate to rely on the analysis in the Post-Authorization Change Report (PACR)/Revised Programmatic EIS (RPEIS), as supplemented by this SEIS, and make clear whether this SEIS is programmatic in nature. Finally, as engineering and design advances to bid the levee reaches comprise the Proposed Action for construction awards, we encourage USACE to demonstrate that reliance on this SEIS is appropriate, per Part 3.2(b)(I) of the DoD NEPA Implementing Procedures.

USACE Response: Sections 1.6.1 and 3.1 of the Draft SEIS explain why it is appropriate to supplement the PACR/RPEIS and why no additional reformulation was part of the development of this SEIS. As further stated in Section 3.1, “The proposed changes and design refinements will be evaluated in a Design Documentation Report or an Engineering Documentation Report following ER 1110-2-1150. Before construction commences on each Proposed Action feature, a determination will be made if any design changes including cumulative impact of changes across the project are not within the Chief of Engineer’s discretionary authority.” The SEIS addresses NEPA compliance and compensatory habitat mitigation requirements for all reaches and structures under the Proposed Action and is therefore not programmatic in nature. Section 8 lists all of the laws, regulations, and executive orders that the SEIS fulfills. However, as stated in Section 3.3.6, the construction of the full 86-mile system would occur over numerous years and would be dictated by the USACE Civil Works budget process. If additional or intensified impacts are identified, supplemental NEPA documents and mitigation plans would be required.

8.3 Topic: Hydrology and Hydraulics

Comment Summary: The AdH modeling summary presented in Table 6-1 states that the existing condition (without project) in the model was limited to NFS-constructed features through 2015. The AdH modeling report in Appendix E states the with-project assumption is "the levee has been raised to the appropriate level and is impermeable." This statement does not reflect the reality of the system to date by the NFS, which includes a total of 24 environmental control structures and 15 floodgates; the AdH model only included 10 culverts in the with-project condition. The Particle Tracking Model used AdH hydrodynamic output as the input. We are concerned that neither of these models adequately projects aquatic impacts of the Proposed Action because none of the environmental control structures and floodgates constructed by the NFS after 2015 are included in the with-project condition in these two models to evaluate water transport into and out of the existing flood protection system.

USACE Response: The 1 mm threshold was chosen to clear up any model noise after analyzing results. Removing the 1mm threshold could ultimately increase impacted acreage and structure counts. The induced flooding impact is not only analyzing the 1 mm or 0.003 feet but anything exceeding that value. Overall, the FWOP can be adjusted to show the 1mm threshold to make the comparison fair but should not make a change in results since 1mm is nearly 0.

8.4 Topic: Induced Flooding

Comment Summary: the Draft SEIS uses an inappropriate 1-millimeter (1 mm) threshold to define induced flooding impacts in Sections 6.2 and 6.15. The hydrologic and hydraulic models used in the analysis—ADCIRC, HEC-RAS, and CSTORM-MS—do not have accuracy anywhere near this level. For example, ADCIRC uses a dry depth threshold of 10 centimeters, and HEC-RAS has published accuracy thresholds of 0.2 to 0.5 feet. Using a 1 mm threshold is far below any measurable water surface elevation and, in my view, is not scientifically defensible.

USACE Response: The USACE concurs. The induced flooding impact analysis is not only analyzing the 1 mm or 0.003 feet but anything exceeding that value.

8.5 Topic: Induced Flooding

Comment Summary: The 1 mm threshold in the induced flooding analysis artificially inflates impact acreage and structure counts. Because of the 1 mm threshold, the Draft SEIS identifies extremely large acreages of "impacted" wetlands—over 477,000 acres of herbaceous and woody wetlands—and more than 4,600 acres of developed land and 2,296 acres of sugarcane. It also identifies 752 residential and commercial structures as being affected by induced flooding during 1% AEP (100-year) storm events. I do not believe these results are meaningful because the threshold is not a model output and is far below the

accuracy of the models used. If the induced flooding impact is only 1 mm, then the Proposed Action cannot be meaningfully distinguished from existing conditions.

USACE Response: The 1mm threshold was chosen to clear up any model noise after analyzing results. Removing the 1mm threshold could ultimately increase impacted acreage and structure counts. The induced flooding impact is not only analyzing the 1 mm or 0.003 feet but anything exceeding that value. Overall, the FWOP can be adjusted to show the 1mm threshold to make the comparison fair but should not make a change in results since the 1mm is essentially 0.

8.6 Topic: Induced Flooding Mitigation

Comment Summary: Section 6.2.1.1.1 presents CSTORM-MS model results showing that, under the No Action Alternative in 2085, the interior of the NFS levee system could be inundated with 8 to 12 feet of water during a 1% AEP storm. I recommend that the Final SEIS also include No Action model results for 2035 so the public can understand the impacts of delays caused by lack of funding for levee lifts.

USACE Response: The No Action Alternative results for 2035 are provided in the full C-STORM modeling report in Appendix H. The Proposed Action model results in Section 6.2 quantify the benefit of the project by reflecting the net difference in inundation between the No Action and Proposed Action alternatives.

8.7 Topic: Wetland Impacts

Comment Summary: The Draft SEIS states in Section 6.3.2 that the acreage shown in Tables 6-5 through 6-7 are likely overestimates and will be refined during final design. To understand the true direct wetland impacts of the federal project, I request that USACE provide the difference between the proposed federal levee footprints and the existing NFS-constructed levee footprints. Overestimating impacts increases compensatory mitigation requirements and therefore increases costs to the NFS.

USACE Response: The difference in wetland impacts between the Federal project footprint (Proposed Action) and the NFS-constructed levee footprint (No Action) is captured by the results of the Wetland Value Assessments (see Appendix D). Additional language has been added to the Wetlands Impacts section (6.3.2) for clarification. The No Action Alternative includes the levees, floodgates, and environmental control structures constructed by NFS prior to the signing of the PPA for the proposed Federal project. Much of the design and project footprints incorporated into the SEIS are at a low level of design. Project impacts will be tracked by habitat type as design proceeds to ensure impacts are reassessed at the 100% level of design and mitigation projects are sized appropriately to ensure only compensatory mitigation is completed.

8.8 Topic: Induced Flooding Mitigation

Comment Summary: The Draft SEIS states that mitigation for induced flooding outside the levee system would not be developed until final design, and that the NFS would be responsible for acquiring real estate for mitigation. Because the project will be built in phases as funding becomes available, I am concerned that the arbitrary 1 mm threshold could lead to inconsistent mitigation requirements and increased financial burden on the NFS.

USACE Response: To determine if induced flooding impacts raise to the level of a taking of property rights, USACE would apply the most recent caselaw to the Morganza to the Gulf Project by reviewing the hydrologic analysis reports and determining which line of court cases would apply to the type of induced flooding identified in the report. USACE would then apply that same legal reasoning to each individual reach. Once funding of construction of a project feature is Congressionally appropriated, final designs would be initiated and the USACE would conduct a detailed, site-specific evaluation of land characteristics, such as the current physical attributes of the land, identification of structures, how the property is currently being used by landowners, how the uses of the property would be affected, and how flooding would impact property values. The USACE would coordinate with the NFS, who is responsible for any required real estate acquisitions or flowage easements. The SEIS contains the modeling information that will be used for initial indication if water levels are expected to increase in certain areas. This modeling information informs the reader that there may be an effect of increased water levels on certain properties. However, for properties with increased water levels, more analysis would determine if an impact occurs that requires mitigation based on the attributes of the land.

8.9 Topic: Compensatory Habitat Mitigation

Comment Summary: It is unclear whether the direct wetland impacts in the SEIS align with the Sackett decision. Wetlands on the protected side of the levee system that do not have a continuous surface connection to jurisdictional waters should not require compensatory mitigation under Section 404 of the Clean Water Act. Without a delineation of jurisdictional wetlands within the Proposed Action footprint, I am concerned that direct impacts may be overestimated, again increasing costs to the NFS.

USACE Response: In compliance with 33 U.S. Code 2283, and ER 1105-2-100 Appendix C, Civil Works mitigates damages to ecological resources, including terrestrial and aquatic resources, and fish and wildlife losses. As such, Civil Works assesses impacts to habitats beyond those defined as jurisdictional.

8.10 Topic: Indirect WVAs

Comment Summary: Under DoD NEPA procedures, the EIS must evaluate reasonably foreseeable environmental effects. However, Wetland Value

Assessments (WVAs) for indirect wetland impacts are not included in the SEIS, even though indirect impacts are incorporated into habitat acreages and AAHUs in the SEIS and Appendix C. In the SEIS main report, Section 6.3.2.2.2 states that the project is expected to cause only negligible to minor salinity changes, which would have negligible to minor effects on marsh vegetation. I do not believe negligible to minor impacts warrant compensatory mitigation. I am also concerned that the analysis may not account for the operation of the Morganza system constructed by the NFS prior to the 2021 PPA.

USACE Response: The difference in wetland impacts between the Federal project footprint (Proposed Action) and the NFS-constructed levee footprint (No Action) is captured by the results of the Wetland Value Assessments (see Appendix D). Additional language has been added to the Wetlands Impacts section (6.3.2) for clarification. The No Action Alternative includes the levees, floodgates, and environmental control structures constructed by NFS prior to the signing of the PPA for the proposed Federal project. The SEIS WVAs do indeed account for the operation of the system constructed by the NFS prior to the signing of the PPA.

8.11 Topic: WVAs

Comment Summary: The U.S. Fish and Wildlife Service recommends continued coordination on indirect wetland impacts in its Fish and Wildlife Coordination Act Report. I request that CPRA be included in all coordination discussions between USACE and USFWS regarding WVAs and indirect wetland impacts for the Proposed Action.

USACE Response: CPRA is a member of the SEIS Habitat Evaluation Team (HET) and has been invited and has participated in all HET meetings that have occurred for the project, including those where WVA modeling for the project was discussed in detail. USACE has and will continue to coordinate discussions regarding WVAs and indirect wetland impacts for the Proposed Action with CPRA, FWS, and all other HET members. As described in Sections 3.5 and 6.3 of the Draft SEIS, indirect wetland impacts have been assessed and included in the Draft SEIS in terms of acreages, but indirect WVAs are ongoing. As one critical step in developing the indirect WVAs for the Final SEIS, the USACE will engage with the HET, including CPRA and all other HET members, to discuss the indirect WVAs in detail.

8.12 Topic: Compensatory Habitat Mitigation

Comment: I recommend that USACE use CPRA's Master Plan wetland restoration projects to satisfy compensatory mitigation requirements for direct construction impacts associated with upgrading the existing levees and structures in the Morganza to the Gulf Project.

USACE Response: Comment acknowledged. State Master Plan projects have been incorporated into many of the mitigation projects in the final array.

9 Dean, Joseph

9.1 Topic: Levees and Geotechnical Stability; Borrow Sites

Comment Summary: The commenter expresses concern that large borrow pits within the project area may contribute to erosion by creating strong currents at depth, potentially undermining surrounding land from below and causing structural integrity of the surrounding land.

USACE Response: The borrow pits located within the project area will be closely examined for stability, erosion, and material suitability. Any concerns mentioned above will be evaluated and addressed appropriately during design. Per current standards, a usable borrow pit will need to be at least 300 feet from the levee footprint.

10 EPA

10.1 Topic: Permits

Comment Summary: National Pollution Discharge Elimination System: EPA recommends each entity associated with any of the project's proposed construction-related activities (including on-site and off-site construction support activities) review 40 CFR Part 122.26(b)(14)(x), 40 CFR Part 122.26 (b)(15)(i), LAC 33:IX.2511.B.14.j, LAC 33:IX.2511.B.15, and the terms and conditions of Louisiana's Department of Environmental Quality's latest effective Small Construction General Permit (LAR200000) or General Permit for Storm Water Discharges from Small Construction Activities (equal to or greater than 1 acre but less than 5 acres) and LDEQ's latest effective Large CGP (LAR100000) or General Permit for Storm Water Discharges from Construction Activities Five Acres or More. EPA is the National Pollutant Discharge Elimination System permitting authority for stormwater discharges within the State of Louisiana, on Indian country and lands of exclusive federal jurisdiction; therefore, EPA's CGP coverage would be required before any construction activities and covered on-site or off-site construction support activities commence.

USACE Response: Concur. Within Sections 3.5.1.3, 8.5, and ES 1.4.4. of the SEIS, USACE has committed to acquiring a Section 402 LPDES for activities 5 acres or more prior to construction.

10.2 Topic: Surficial Aquifer

Comment Summary: There is no discussion about the impact on local groundwater, particularly the Mississippi Alluvial Aquifer, which is the source of

most reported groundwater withdrawals in Terrebonne Parish. EPA recommends the environmental document discuss the potential impacts from the planned excavation and any potential chemical leakage from machinery during the process, along with strategies for mitigating these impacts.

USACE Response: For confirmation, the USACE assumes the comment refers to the Mississippi River Alluvial Aquifer. The mitigation strategies will be disclosed within the Clean Water Act Section 402 permit application. Per LDEQ website on available aquifer recharge, the subject area has a recharge potential of “None”: <https://www.deq.louisiana.gov/page/recharge-potential-of-louisiana-aquifers-maps>. This information will be added to the environmental consequences section of the SEIS.

10.3 Topic: Compensatory Habitat Mitigation, Oysters

Comment Summary: As discussed in Section 6.15.3 “Habitat Mitigation Plans”, adverse effects on oyster seeding grounds in the project area will be avoided by dividing borrow lands into multiple cells. However, this does not address how the oyster propagation areas will be affected by other changes brought on by project construction, such as changes in turbidity, suspended solids, salinity, and surface water temperature. EPA recommends the environmental document describe what monitoring activities will take place before and after construction to make sure that these oyster propagation areas are successful and ecologically functioning.

USACE Response: The USACE has and will continue to coordinate with LDWF throughout engineering and design to ensure impacts to Public Oyster Seed Grounds and cultch sites are avoided to the maximum extent practicable. Appendix F of the Final SEIS includes documentation of coordination efforts to date.

11 FEMA, Region 6

11.1 Topic: Floodplains

Comment Summary: We would request that the community floodplain administrator be contacted for the review and possible permit requirements for this project. If federally funded, we would request project to comply with Executive Orders 11988 and 119990.

USACE Response: The USACE has contacted the parish floodplain administrators and will update the Final SEIS to include this coordination. The USACE and the NFS and all contractors will comply with all wetlands and floodplains executive orders, laws, and regulations throughout the planning and implementation of the project. Section 8 of the SEIS summarizes compliance for these resources.

12 FWS

12.1 Topic: Compensatory Habitat Mitigation

Comment Summary: The Service references its November 4, 2025 draft Fish and Wildlife Coordination Act Report (FWCAR), which evaluated project impacts on migratory birds, candidate and listed species, and other at-risk species. For FWCAR recommendation number 1 regarding avoiding, minimizing, and “in-kind” mitigation for habitat losses due to implementation of the project, the USACE concurred. The Service further recommends that “in-kind” apply to hydrology as it relates to existing levee systems. For example, mitigation for impacted flood side forest should be located outside of any levee system.

USACE Response: Concur. As per 33 USC 2283, mitigation would replace the lost functions and values of the habitat, including hydrologic and vegetative characteristics.

12.2 Topic: GIWW West Floodgate Operations

Comment Summary: For FWCAR recommendation number 5 regarding maintaining existing freshwater flows to the project area from the Atchafalaya River via the GIWW, the USACE referred to the draft water control plan which would specify when structures such as the GIWW West floodgate would be closed. Generally, floodgates on the GIWW would only be closed when water surface elevations at the structure reach 3.0 feet (ft) North American Vertical Datum of 1988 (NAVD88), which would happen with 2-year and 5-year annual exceedance probabilities. The Services agrees with the USACE’s response.

USACE Response: USACE appreciates the Service’s concurrence. As stated in SEIS main report Section 3.5.1.5, the USACE “would determine water control plan/manual requirements during the final design phase. MVD would review the plan and issue approval within 1 year after full scale operations.” The USACE will continue to refine the water control plan and coordinate with the Service to ensure that freshwater flow considerations are considered.

12.3 Topic: GIWW West Structure Operations

Comment Summary: For FWCAR recommendation number 6 regarding GIWW Floodgate sluice gates being kept open except in the event of a tropical storm, the USACE again referred to the same draft water control plan as for recommendation number 5. In that draft water control plan, footnote 1 states that sluice gates associated with floodgates would remain open when floodgates are closed except for when closure conditions are reached.

USACE Response: As stated in the SEIS main report Section 3.5.1.5, the USACE “would determine water control plan/manual requirements during the final design phase. MVD would review the plan and issue approval within 1 year

after full scale operations.” The USACE will continue to refine the water control plan and coordinate with the Service to ensure that freshwater flow considerations are considered.

12.4 Topic: Structure Operations

Comment Summary: For FWCAR recommendation number 7 regarding potential modification of water control structure operations due to increasing sea level in the future, the USACE generally agrees with the Service and no further comments from the Service are required.

USACE Response: The USACE will continue coordination with the Service as operational details and monitoring plans are finalized.

12.5 Topic: Reach A, Mandalay NWR

Comment Summary: Regarding FWCAR recommendations 8 and 14, the Service notes that USACE stated the SEIS does not address construction of Reach A, where Mandalay NWR is located. The Service acknowledges USACE’s commitment to avoid impacts to the refuge and to address Reach A in a separate NEPA document.

USACE Response: The USACE confirms that Reach A will be addressed in a separate NEPA analysis and that the USACE will continue to coordinate with the Service to avoid or minimize impacts to Mandalay NWR. Mitigation for significant habitat impacts will be included as required.

12.6 Topic: Beneficial Use of Soils

Comment Summary: For FWCAR recommendation number 17 regarding using soils removed prior to levee construction to create or restore emergent wetlands, the USACE indicated they would work with the Service to determine the feasibility of that action. The Service agrees with their response.

USACE Response: USACE appreciates the Service’s concurrence and will continue to work with the Service to determine the feasibility of that action.

12.7 Topic: Native Vegetation

Comment Summary: Regarding FWCAR recommendation 19, the Service agrees with USACE’s approach to allow natural revegetation while also considering native plantings where appropriate.

USACE Response: USACE appreciates the Service’s concurrence and will continue to work with the Service to determine the feasibility of that action.

12.8 Topic: Wetlands

Comment Summary: For FWCAR recommendation number 23 regarding the concern that the new definition of the Waters of the United States could cause the redefinition of some wetlands as non-jurisdictional, the USACE stated that they would continue to work closely with the Service and would develop a supplemental NEPA document if necessary to address impacts beyond those disclosed in this DSEIS. The Service looks forward to working with the USACE in the future on this matter when further clarification may inform the fate of those wetlands in question.

USACE Response: USACE acknowledges the Service's comment and will continue to coordinate closely as regulatory definitions evolve. The Corps will prepare supplemental NEPA documentation if impacts extend beyond those disclosed in the Draft SEIS.

12.9 Topic: Wetlands

Comment Summary: Page viii, Wetland Impacts and throughout the document: The total acres and AAHUs of impacts does not match the values in the Service's 2025 draft FWCA report due to a small discrepancy in the brackish marsh amount between the two documents. The Service and the USACE will coordinate to rectify those values.

USACE Response: USACE acknowledges the discrepancy and will coordinate with the Service to reconcile the brackish marsh impact discrepancy for the Final SEIS.

12.10 Topic: ESA Coordination

Comment Summary: Consistent with our November 20, 2025, concurrence with the USACE's determination that the activities proposed in MTG DSEIS are not likely to adversely affect any listed or proposed threatened or endangered species or their critical habitat, the Service maintains our concurrence with the USACE determination. No further Endangered Species Act consultation with the Service will be required for the proposed project unless there are changes in the scope or location of the project elements. The Service recommends that the USACE contact the Service regarding threatened and endangered species if the project has not been initiated within one year.

USACE Response: USACE acknowledges the Service's concurrence and will re-engage in ESA coordination if project modifications occur that may affect listed species or critical habitat.

12.11 Topic: Compensatory Habitat Mitigation

Comment Summary: Page 60, Compensatory Habitat Mitigation, Figure 4-1. NFS Proposed Mitigation Sites: There appears to be a graphical artifact showing red squarish polygons that are supposed to represent swamp/BLH habitat in areas that are marsh and would not be appropriate for swamp or BLH mitigation.

USACE Response: Concur. Current screening criteria would remove from consideration any projects that would convert other habitat types which would only result in a switching of habitats needing mitigation.

12.12 Topic: Typos

Comment Summary: The Service provides several technical comments:

- Page 15: “reduced” should be “reduction.”
- Page 16: Table 1-1 lacks units for levee design elevations.
- Page 83: “sweet” should be “suite.”
- Page 230: Recommendation 2 from the FWCA report is missing; only the USACE response is shown.

USACE Response: USACE acknowledges the technical comments and will correct the identified issues in the Final SEIS. Editorial corrections, including terminology and missing units, will be incorporated, and the omission of Recommendation 2 will be corrected in the Final SEIS.

13 Harang, Bryan

13.1 Topic: Compensatory Habitat Mitigation

Comment Summary: The commenter states that his family’s sugarcane farm has been in continuous operation for seven to eight generations and opposes any conversion of productive agricultural land to mitigation. He emphasizes that financial compensation cannot replace a family farm or its legacy.

USACE Response: USACE acknowledges the importance of long-standing agricultural operations and the commenter’s desire to maintain agricultural use of the property. The mitigation areas shown in the Draft SEIS represent planning-level footprints. During advanced design, USACE will refine mitigation needs and adjust final footprints as necessary. USACE will coordinate directly with affected landowners before determining final footprints, and no mitigation will occur on private lands without completion of appropriate real estate agreements.

13.2 Topic: Compensatory Habitat Mitigation

Comment Summary: The commenter questions why mitigation for a project in Lafourche and Terrebonne Parishes would occur in Assumption Parish, particularly when it would displace active agriculture.

USACE Response: Consistent with the USACE's 404 Regulatory Program, the hydrologic basins used to plan mitigation for swamp and bottomland hardwoods impacts are the same river basins as where the impacts occurred, namely Terrebonne and Barataria River Basins, and were conglomerated to mitigate together on individual sites within the Ecoregion. Additionally, mitigation site selection is based on ecological suitability and the ability to replace lost habitat functions. Soils and elevations that traditionally supported forested habitat types have historically been areas targeted for agricultural development. As such, these areas are exceptionally suited for forest restoration.

13.3 Topic: Public Coordination

Comment Summary: The commenter states that he was not directly notified that his property was being considered as a potential mitigation site and expresses concern that landowners may be unaware of impacts unless informed informally.

USACE Response: USACE is committed to transparency and early coordination with affected landowners. The Draft SEIS identifies preliminary mitigation areas for environmental analysis only. Prior to selecting any site for mitigation, USACE and the NFS will conduct direct outreach to landowners and initiate real estate coordination. No mitigation activities will occur on private property without appropriate notification and agreements.

14 LDEQ

14.1 Topic: General Support

LDEQ states that it has no objections to the proposed project based on the information provided. As noted in the letter, "the Department has no objections based on the information provided in your submittal." LDEQ requests that the project team notify its Single-Point-of-Contact immediately if any problems arise during implementation.

USACE Response: Thank you for your comment. The USACE will notify LDEQ's Single-Point-of-Contact immediately if any problems arise during implementation.

14.2 Topic: Compensatory Habitat Mitigation

LDEQ recommends including monitoring, reporting, and maintenance—such as replanting—as part of all habitat restoration activities.

USACE Response: Concur. Please see Appendix C for more information on monitoring, reporting and maintenance requirements for the mitigation projects.

14.3 Topic: Air Quality

Comment Summary: LDEQ notes that Terrebonne and Lafourche Parishes are currently in attainment with National Ambient Air Quality Standards and have no general conformity obligations.

USACE Response: Concur. This information is found in the SEIS in Section 6.9.

14.4 Topic: Air Quality

Comment Summary: LDEQ recommends reviewing applicable regulations for lead-based paint, asbestos, and fugitive emissions, as these may apply to renovation or demolition activities.

USACE Response: During construction of the proposed features, if a structure is renovated or demolished, best management practices would be implemented within Spill Prevention, Control, and Countermeasure Plan.

14.5 Topic: Air Quality

Comment Summary: LDEQ notes that construction activities may generate temporary air emissions and requests that USACE implement appropriate measures to minimize impacts.

USACE Response: The construction proposed within the SEIS will cause a temporary increase in air emissions as mentioned in Section 6.11.2. Best management practices would be implemented within Spill Prevention, Control, and Countermeasure plans during construction.

14.6 Topic: Hydrology, Operations

Comment Summary: LDEQ recommends ensuring that control structures allow sufficient flow, tidal movement, and fish migration, and that natural flow is maintained until closure is necessary.

USACE Response: Concur. Environmental control structures are incorporated into the proposed levee designs to allow for flow, tidal movement, and fish migration. Structures would remain open except when storms are approaching or high-water level triggers are reached. Section 3.3.7 of the SEIS provides an overview of the draft operations plan.

14.7 Topic: Alternative Evaluation

Comment Summary: LDEQ recommends evaluating restoration of natural protection areas and comparing those options to new levees or control structures in terms of cost, benefits, and ecological effects.

USACE Response: As summarized in Section 3.1 of the SEIS, alternative plans for the purpose of coastal storm and hurricane risk reduction were evaluated in the 2002 and 2013 Morganza-to-the-Gulf Project feasibility studies and environmental impact statements. The SEIS is not a feasibility study and does not include plan reformulation; therefore, no new alternative development or reformulation was conducted as part of the Draft SEIS. If future design changes exceed the Chief of Engineers' discretionary authority, a Post-Authorization Change Report would be required, which could lead to a reformulation process.

14.8 Topic: HTRW

Comment Summary: LDEQ notes that soils exceeding RECAP screening standards may need to be disposed of at a permitted facility or managed under a beneficial use or soil reuse plan. LDEQ requests that if contaminated soil or groundwater is encountered, the project team notify the agency's Single-Point-of-Contact and take precautions to protect workers.

USACE Response: In the event that contaminated soil or groundwater exceeding RECAP screening standards is encountered, USACE will notify LDEQ's Single-Point-of-Contact and take the proper precautions to protect workers.

14.9 Topic: HTRW

Comment Summary: LDEQ notes that active and former UST sites exist near the project area. If USTs or contaminated soils are encountered, they must be managed in compliance with LAC 33:XI.

USACE Response: If any USTs or contaminated soils are encountered, USACE will manage them in accordance with LAC 33:XI.

14.10 Topic: Levees and Geotechnical Stability

Comment Summary: Channels proposed to be modified and neighboring upstream and downstream channels should be designed and sized with consideration of natural channel design methodologies and principles, as improper design can result in increased velocities and channel degradation (scouring), erosion, bank instability, and water quality degradation i. Natural and formerly natural channels should be assessed using Watershed Assessment of River Stability and Sediment Supply (WARSSS) methodologies as appropriate, including the Bank Erosion Hazard Index (BEHI) and Bank Analysis Nonpoint Contribution of Sediment (BANCS). Increased stream velocities can jeopardize residential properties, pipelines, bridges, and other infrastructure, and may cause increased pollutant loads (e.g., sediment, metals, low oxygen levels) to waterways through channel(s) realignment and re-establishment of naturally vegetated banks, meanders, and original lengths and slopes for stabilization iii. Please consider restoration of natural protection areas and compare those

options to the new/proposed levee/control structures for potential costs, benefits, and ecological effects.

USACE Response: Geotechnical investigations will evaluate localized scour, foundation behavior, and lateral stability adjacent to levee reaches. Where needed, countermeasures—such as armoring, vegetative cover, or flow-deflection features—will be incorporated into final design and OMRR&R guidance. Our Hydraulics team will perform the required analysis to determine the impacts related to channel modifications, and those impacts will be addressed appropriately.

14.11 Topic: Water Quality Certification

Comment Summary: LDEQ states that the project will require a Water Quality Certification under Section 401 of the Clean Water Act and requests coordination to ensure compliance with state water quality standards.

USACE Response: A prefile meeting request was submitted to LDEQ on 2/18/2025 for the proposed project. Currently, USACE is finalizing the 404(b)(1) analysis; once this is finalized the USACE will submit the 401 and 404(b)(1) reports for a joint public review.

14.12 Topic: Permitting and Water Quality

Comment Summary: LDEQ provided permitting and BMP comments and requirements for water quality compliance and minimization of impacts.

USACE Response: USACE will obtain required approvals and implement BMPs for erosion and stormwater control, protect groundwater, and comply with applicable water and air quality requirements. Coordination with LDEQ/EPA on certifications and stormwater coverage will continue.

14.13 Topic: Design and Structures (Culverts, Gates, Bridges)

Comment Summary: The commenter requests specific structures and operational considerations to maintain access and drainage. If the project concerns flood control in residential and business areas that modify infrastructure and/or drainage: a. Nature-based solutions should be considered to address these, and storm water issues, before entry to downstream waters (1) <https://watershed.la.gov/nature-based-solutions> (2) https://www.epa.gov/green-infrastructure/green_x0002_infrastructure-design-and-implementation c. If the project involves bridge and/or lateral/inline structures (e.g., culverts, weirs, sluice/lift gates) a. Design to allow water to flow freely at the structure without restrictions during all flow regimes to preserve the natural functions of the stream channels, maintain appropriate channel dimensions, and flow regimes i. Consequences of improper design and maintenance can lead to debris build-up

against structures restricting flow, leading to decreases in velocity, reaeration, and dissolved oxygen levels 4.

USACE Response: During final design, structure type, sizing, and operation will be designed and modeled to convey flows effectively to meet drainage, navigation, and risk-reduction objectives. USACE will coordinate with the NFS and affected landowners to evaluate operable gates and culverts consistent with the Water Control Plan and environmental compliance.

15 LDWF

15.1 Topic: West Indian Manatee

Comment Summary: LDWF notes that the West Indian Manatee, a federally and state-listed threatened species, may occur within the project area. The agency advises that submerged aquatic vegetation, which constitutes critical habitat, should be avoided during project activities. LDWF also requests that any manatee sightings be reported immediately.

USACE Response: USACE acknowledges LDWF's identification of the potential presence of the West Indian Manatee within the project area. USACE has found the West Indian Manatee not likely to be adversely affected by project activities. During engineering, design, and construction, USACE will implement avoidance and minimization measures consistent with the Endangered Species Act and the Marine Mammal Protection Act as described in Appendix N Part 2.2. Construction personnel will be instructed to avoid submerged aquatic vegetation and to halt in-water work if a manatee is observed. Any sightings will be immediately reported to the Services Louisiana Ecological Services Office and the LDWF in accordance with agency guidance.

15.2 Topic: Alligator Snapping Turtle

Comment Summary: LDWF states that the Western Alligator Snapping Turtle, proposed for federal listing as threatened, may occur in the project area. The agency recommends minimizing disturbance to nesting habitat, avoiding removal of woody debris, and timing dredging activities to avoid the nesting season.

USACE Response: Throughout the design and implementation process, USACE will continue to coordinate with LDWF and the FWS on measures to minimize disturbance to AST nesting habitat.

15.3 Topic: Eastern Black Rail

Comment Summary: LDWF notes that the Eastern Black Rail, a federally threatened species, may occur in high marsh habitats within the project area. The agency recommends minimizing disturbance to high marsh vegetation.

USACE Response: USACE acknowledges the potential presence of the Eastern Black Rail and will incorporate avoidance and minimization measures into project design and construction planning. High marsh habitats will be identified during pre-construction surveys, and construction activities will be adjusted where feasible to avoid disturbance to these areas. Coordination with LDWF and the FWS will continue throughout the design and implementation process.

15.4 Topic: Bald Eagle

Comment Summary: LDWF notes that the Bald Eagle is protected under federal law and requests that all nests be protected, no large trees be removed, and no major activities occur during the nesting period (September 1–June 1).

USACE Response: As stated in the SEIS Section 6.7, the National Bald Eagle Management Guidelines will be followed. Additionally, coordination with LDWF and the FWS will continue throughout the design and implementation process.

15.5 Topic: Colonial Waterbird Nesting Colonies

Comment Summary: Entry into or disturbance of active breeding colonies is prohibited by LDWF. In addition, LDWF prohibits work within a certain radius of an active nesting colony. Nesting colonies can move from year to year, and no current information is available on the status of these colonies. If work for the proposed project commences during the nesting season, conduct a field visit to the worksite to look for evidence of nesting colonies. This field visit should take place no more than two weeks before the project begins. If no nesting colonies are found within 1,000 feet (2,000 feet for Brown Pelicans) of the proposed project, no further consultation with LDWF will be necessary. If active nesting colonies are found within the previously stated distances of the proposed project, further consultation with LDWF will be required. In addition, colonies should be surveyed by a qualified biologist to document species present and the extent of colonies. Provide LDWF with a survey report (*.pdf, *.doc, *.docx, etc.) packet that includes the following information: 1. qualifications of survey personnel; 2. survey methodology including dates, site characteristics, and size of survey area; 3. species of birds present, activity, estimates of number of nests present, and general vegetation type including digital photographs representing the site; 4. print out(s) of site map(s) with topographic or imagery basemap; and 5. Google Earth *.kml or *.kmz file(s) or ArcGIS shapefile(s) projected in UTM NAD83 Zone 15 to illustrate the location and extent of the colonies. Please e-mail survey reports to Carolyn Michon at cmichon@wlf.la.gov. To minimize disturbance to colonial nesting birds, the following restrictions on activity should be observed:

- For colonies containing nesting wading birds (e.g., herons, egrets, night-herons, ibis, Roseate Spoonbills) or Anhingas or cormorants, all project activity occurring within 1000 feet of an active nesting colony should be restricted to the non-nesting period (i.e., September 1 through February 15).

- For colonies containing nesting gulls, terns, or Black Skimmers, all project activity occurring within 650 feet (2000 feet for Brown Pelicans) of an active nesting colony should be restricted to the non-nesting period (i.e., September 16 through April 1).

If you have any questions or need additional information on birds, please contact Rob Dobbs at 337-735-8675.

USACE Response: As stated in the SEIS sections 5.7.3.1 and 6.7, qualified biologists will survey the area for nesting colonies prior to construction and during nesting season to determine the presence of nesting birds. Also stated is the requirement to adhere to the no work buffer zones established by LDWF and FWS. Additionally, coordination with LDWF and the FWS will continue throughout the design and implementation process.

15.6 Topic: Pointe Aux Chenes Wildlife Management Area

Comment Summary: For portions of the project within the Point Au Chenes Wildlife Management Area (WMA): LDWF should be included and be a part of any stakeholder, governance or advisory team with responsibilities for project planning, operations, maintenance and monitoring.

USACE Response: USACE acknowledges LDWF's request for participation in planning and operational coordination within the Pointe-aux-Chenes WMA. USACE will continue to coordinate with LDWF throughout engineering, design, and construction to ensure appropriate involvement in decisions affecting WMA resources.

15.7 Topic: Pointe Aux Chenes Wildlife Management Area

Comment Summary: LDWF states that any impacts to the WMA requiring compensatory mitigation should be mitigated within the WMA.

USACE Response: USACE acknowledges LDWF's position regarding compensatory mitigation within the WMA. Mitigation planning will continue to consider opportunities to implement compensatory mitigation within or adjacent to impacted areas, consistent with ecological suitability, regulatory requirements, and site availability.

15.8 Topic: Hunting on WMA

Comment Summary: LDWF states that no activities will be allowed within the WMA during hunting seasons unless specifically approved.

USACE Response: USACE will coordinate with LDWF to schedule project activities within the WMA in a manner that minimizes impacts to hunting seasons and will seek approval for activities that occur during the hunting season.

15.9 Topic: Concurrence

Comment Summary: LDWF Fisheries concurs with the FWS's positions and recommendations in the Draft Fish and Wildlife Coordination Act Report.

USACE Response: USACE appreciates LDWF's support. The Final SEIS will be updated to include LDWF's letter of concurrence, and Section 8.1 of the SEIS main report will be revised to summarize this support.

15.10 Topic: Public Oyster Seed Areas

Comment Summary: LDWF requests that USACE coordinate with the LDWF Oyster Program during engineering and design to avoid or minimize impacts to Public Oyster Seed Areas and to determine appropriate mitigation for unavoidable impacts.

USACE Response: USACE used available Public Oyster Seed Ground data during project planning to avoid impacts to these areas. The mitigation and borrow site boundaries shown in the Draft SEIS are intentionally broad and will be refined as additional survey data become available. USACE will continue to coordinate with LDWF to ensure that final designs avoid or minimize impacts and that any unavoidable impacts are mitigated appropriately.

16 LeFleur, Gary (Nicholls State University)**16.1 Topic: Compensatory Habitat Mitigation**

Comment Summary: I am concerned about the project's potential impact on floatant marsh. From my experience, floatant marsh is extremely difficult to restore or recreate, and I want to know how the Corps plans to mitigate any loss of this habitat. Converting floatant marsh into rooted marsh or open water is not the same as replacing floatant marsh, and I am worried about how this will be addressed. If floatant marsh cannot be directly replaced, I believe the Corps should consider alternative mitigation approaches. For example, creating additional rooted marsh that might eventually develop into floatant marsh, or funding research focused on floatant marsh restoration. I want to offer these ideas as possible ways to address the challenge.

USACE Response: The USACE's Mitigation Plan does not propose to convert floatant marsh to any other habitat type. Doing so would only increase the mitigation requirement for the project and would be avoided to the maximum extent possible.

16.2 Topic: Hydrology, Fisheries

Comment Summary: I appreciate the decision to place the levee south of Lake Boudreaux. This alignment helps protect the lake as well as the communities of

Chauvin and the surrounding area, and I am grateful for that. Lake Boudreaux is not only an ecological resource but also a cultural and economic one for the communities of Chauvin and Dulac. Commercial and recreational fishers depend on the lake, and its tidal function is closely tied to the community's cultural identity and socioeconomic well-being. I am concerned that the levee system may disrupt the natural tidal fluctuations in Lake Boudreaux. The lake's tidal exchange is essential for supporting shrimp populations, especially brown shrimp, and I want to ensure that the project does not interfere with the natural tidal patterns that have existed for generations. I ask that the culverts associated with the levee south of Lake Boudreaux remain open to allow water exchange between the areas north and south of the levee. Maintaining this exchange is critical for preserving the tidal fluctuations that support the lake's ecological function, including shrimp habitat. I have seen culverts kept closed in other locations, and I am concerned that this could happen here. I understand that culvert operation may be managed by the local levee district, but I want to make sure the Corps is aware of my concern.

USACE Response: The proposed project would not affect tidal function in Lake Boudreaux as compared to existing conditions. The project would maintain tidal exchange by maintaining or improving existing culverts for tidal exchange through the project levees.

16.3 Topic: Cultural Resources

Comment Summary: I appreciate your efforts on this huge project. However, some of your impacts will not just be to "tribal lands" where people live but to "Ancient Mounds" such as sites on Bayou Sole, near Deep Soline Lake and just south of Pointe Aux Chenes. How do you mitigate "loss of a sacred site" that cannot be equaled with money or another mound. You could build levees around sacred sites similar to Fort Livingston--that would help.

USACE Response: USACE values your comments. Due to the size and extent of MTG Project, not all cultural resources are yet identified. Numerous cultural resources are already known to exist, but their discussion is limited within the SEIS due to development of a Programmatic Agreement (PA) per 36CFR800.14 that obligates USACE to conduct surveys and identify all cultural resources – including Tribal Lands or Ancient Mounds – and coordinate if adverse effects may occur as a result of MTG. Mitigation for loss is not defined in advance of consultation and coordination, but will be agreed by formulation of a Memorandum of Agreement (MOA) between interested parties.

16.4 Topic: Cultural Resources and Tribal Coordination

Comment Summary: I worry about your "mitigation" of a cultural gem such as IDJC. How does one "mitigate" the loss of cemeteries and cultural homeland? Money does not equal the cultural integrity of a people connected to a place.

USACE Response: USACE thanks you for your comment. Whether ancient or modern, human remains and cemeteries receive special considerations governed by law, most notably Louisiana’s [Unmarked Human Burial Sites Preservation Act \(R. S. 8:671-681\)](#) and the [Louisiana Historic Cemetery Preservation Act \(R.S. 25:931-943\)](#), which USACE follows as part of our overall compliance with the National Historic Preservation Act. In regard to cultural resources, due to the size and extent of MTG Project, not all cultural resources are yet identified. Numerous cultural resources are already known to exist, but their discussion is limited within the SEIS due to development of a Programmatic Agreement (PA) per 36 CFR 800.14 that obligates USACE to conduct surveys and identify all cultural resources – including those lands modeled to be impacted by induced flooding such as IDJC lands- and coordinate if adverse effects may occur as a result of MTG. Mitigation for loss is not defined in advance of consultation and coordination, but will be agreed by formulation of a Memorandum of Agreement (MOA) between interested parties. In Section 4.3 “Induced Flooding” of the SEIS, USACE discusses the legal framework component of the civil works process, which considers project-induced changes to hydrologic conditions that may require the acquisition of real property interests in private property for public use.

17 Liner, Quint

17.1 Topic: Structures (Culverts, Gates, Bridges)

Comment Summary: The commenter requests specific structures and operational considerations to maintain access and drainage. “On Wedgewood Court, there is a drainage canal that goes from the bayou to Miners Canal. It stays clogged up right now with lilies. Where your project passes over this area, will there be a culvert where that ditch is? That would help dry out that property on this side of the levee.”

USACE Response: As part of the project’s design process, all existing drainage infrastructure will be modeled to ensure there is no negative impact on the current system. Our commitment is to maintain existing drainage patterns.

18 Morganza Action Coalition

18.1 Topic: General Support, Implementation

Comment Summary: The Morganza Action Coalition expresses support for the project, noting that it will provide significant environmental benefits and should be constructed as expeditiously as possible.

USACE Response: USACE appreciates the Morganza Action Coalition’s continued support for the Morganza to the Gulf Project. The Coalition’s comments regarding the environmental benefits of the system and the

importance of timely implementation are noted and will be included in the Final SEIS. Section 3.3.6 of the Draft SEIS describes project implementation and time frame.

19 National Environmental Banking Association

19.1 Topic: Compensatory Habitat Mitigation

Comment Summary: NEBA states that it is an association of wetland and species mitigation bankers, private landowners, and support companies committed to providing high-quality mitigation banks and projects to assist the private sector in meeting regulatory requirements under the Clean Water Act, Endangered Species Act, and other mandates. NEBA expresses support for private-sector mitigation solutions that are cost-effective, efficient, and reduce regulatory burdens while meeting environmental compliance needs.

USACE Response: Comment acknowledged.

19.2 Topic: Compensatory Habitat Mitigation

Comment Summary: NEBA states that it supports regulatory consistency and certainty in the application of Waters of the United States (WOTUS) rules. NEBA further supports efforts to streamline and reduce burdens on private and public permittees and emphasizes the importance of consistent and transparent application of the 2008 Compensatory Mitigation Rule, including adherence to the mitigation hierarchy outlined in 33 CFR Parts 325 and 332.

USACE Response: Comment acknowledged.

19.3 Topic: Compensatory Habitat Mitigation

Comment Summary: NEBA cites language from the 2021 Energy and Water Development Appropriations Act expressing congressional concern regarding inconsistent implementation of the 2008 Compensatory Mitigation Rule across USACE Districts. The commenter notes that the Act directs the USACE to adhere to the mitigation hierarchy, ensure that deviations are supported by scientific and technical analysis, and brief congressional committees on steps taken to ensure consistent implementation. NEBA also references the 2024 Energy and Water Development Appropriations Act, which urges the USACE to act in accordance with 33 CFR 332 and notes that Congress expects progress in this area. NEBA states that this direction applies to all 38 USACE Districts.

USACE Response: The New Orleans District complies with all applicable laws, regulations, policies and guidance regarding compensatory mitigation, including following the “mitigation hierarchy” as appropriate. Importantly, that hierarchy is not absolute. See *Healthy Gulf v. USACE*, 81 F.4th 510 (5th Cir. 2023). Nevertheless, the New Orleans District regularly purchases mitigation

bank credits as compensatory mitigation for the impacts of its projects. Nevertheless, the New Orleans District regularly purchases mitigation bank credits as compensatory mitigation for the impacts of its projects and has purchased approximately 3,175 credits from banks across the District since 2014.

19.4 Topic: Compensatory Habitat Mitigation

Comment Summary: NEBA states that the substantial wetland impacts described in the Draft SEIS should be mitigated first by exhausting all available wetland mitigation credits from authorized mitigation banks within the New Orleans District, as required by the 2008 Mitigation Rule, before considering other mitigation options.

USACE Response: The New Orleans District complies with all applicable laws, regulations, policies and guidance regarding compensatory mitigation, including following the “mitigation hierarchy” as appropriate. Importantly, that hierarchy is not absolute. See *Healthy Gulf v. USACE*, 81 F.4th 510 (5th Cir. 2023). Nevertheless, the New Orleans District regularly purchases mitigation bank credits as compensatory mitigation for the impacts of its projects.

20 NMFS Habitat Conservation Division

20.1 Topic: EFH

Comment Summary: The MTG Project is in an area designated as essential fish habitat (EFH) for various life stages of federally managed species, and we concur with the species list and habitat characterizations described in the EFH assessment for the project. The primary categories of EFH which would be affected by project implementation are estuarine water column, water bottoms, submerged aquatic vegetation, and emergent wetlands, including fresh, intermediate, brackish, and saline marshes. The EFH consultation requirements of the Magnuson-Stevens Fishery Conservation and Management Act have been fulfilled for the MTG Project. The NMFS appreciates the consideration of our concerns and the close coordination of the USACE New Orleans District.

USACE Response: The USACE thanks you for your comments and will continue to coordinate with NMFS throughout all stages of the project.

20.2 Topic: Compensatory Habitat Mitigation

Comment Summary: As described in the SEIS, the MTG Project would result in adverse impacts to EFH, and a compensatory habitat mitigation plan was developed to fully compensate for project impact to wetlands. The tentatively selected plan mitigation alternative for each habitat type consists of a combination of the purchase of mitigation bank credits and/or the implementation of a USACE-construction mitigation project. The NMFS HCD is supportive of the

mitigation plan provided all mitigation for EFH be located outside of the flood protection system, ideally within the hydrologic basins where the impacts occur. Please continue to coordinate with HCD in the further development and implementation of the MTG Project mitigation plan.

USACE Response: Concur. The USACE will continue to coordinate with the resource agencies throughout engineering and design and construction of the mitigation projects.

21 Parr, Carroll

21.1 Topic: Levees and Geotechnical Stability

Comment Summary The commenter states that the strong performance of Terrebonne Parish's levees during Hurricane Ida demonstrates that required levee heights may not need to be as high as currently assumed.

USACE Response: The USACE designs levee elevations based on engineering standards, risk assessments, and modeling that evaluate a range of storm events, including the 1-percent annual exceedance probability (100-year) storm. While the performance of local levees during Hurricane Ida is noted, a single storm event does not provide a sufficient basis for determining long-term design elevations. The Morganza to the Gulf system incorporates updated hydrologic and hydraulic modeling, sea-level rise projections, and subsidence rates to ensure that levee elevations provide the required level of risk reduction over the project's design life.

21.2 Topic: Socioeconomics and Floodplain Management

Comment Summary: The commenter states that Terrebonne Parish's locally constructed levees performed well during Hurricane Ida, with only one house experiencing minor flooding. The commenter expresses concern that flood zones were expanded after the storm, resulting in new flood insurance requirements that caused financial hardship. The flood zones should be reduced or returned to pre-Ida boundaries.

USACE Response: The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP) mapping and insurance requirements independent of USACE. USACE will continue coordination with FEMA and local administrators while advancing project risk-reduction features.

22 Restore the Mississippi River Delta

22.1 Topic: Compensatory Habitat Mitigation

Comment Summary: Recent design refinements to Morganza were made to reduce costs while maintaining the project's authorized level of risk reduction, including adjustments to the proposed footprint to align with existing NFS levees and minimize both fill requirements and impacts to wetland habitat. In this context, our comments focus on ensuring that all unavoidable habitat impacts are fully mitigated, consistent with the commitment that compensation occurs prior to or concurrent with construction of the Proposed Action. We urge that mitigation commitments for Morganza to the Gulf be clearly defined and implemented prior to or concurrent with construction to ensure no net loss of wetland function. Upholding this standard is essential to maintain ecological integrity while delivering long-term risk reduction benefits to the region's communities.

USACE Response: CEMVN acknowledges your concerns and is committed to providing compensatory mitigation prior to or concurrent with project impacts.

22.2 Topic: Compensatory Habitat Mitigation

Comment Summary: The purpose of compensatory mitigation is to offset avoidable and adverse impacts of a project to replace the loss of wetland and aquatic resource functions. Compensatory mitigation can include wetland restoration to restore natural or historic functions, creation (or establishment) where a wetland did not previously exist, enhancement to heighten, intensify, or improve one or more wetland functions, such as water quality or flood water retention, and preservation to permanently protect ecologically important wetlands or other aquatic resources by implementing legal and physical mechanisms. The scale of Morganza will directly impact 4,500 acres of wetlands and is expected to indirectly impact up to an additional 1,300 acres of wetlands. The tentatively selected plan (tsp) for mitigation suggests using a combination credit purchase from in-kind mitigation banks and U.S. Army Corps of Engineers (the Corps) constructed projects. However, we urge the Corps to work with Louisiana's Coastal Protection and Restoration Authority (CPRA) to identify and implement mitigation that meaningfully replaces the wetland loss and functions at the scale of Morganza.

USACE Response: Comment acknowledged. The goal of the MTG mitigation plan was to create large mitigation projects that would provide greater ecological benefits in the watershed. Please see section 2.5 of the mitigation plan in Appendix C.

22.3 Topic: Compensatory Habitat Mitigation

Comment Summary: Align Mitigation Needs with Coastal Master Plan Projects. While mitigation banks are favored in this SEIS and by the Corps in general,

construction of restoration projects identified in the 2023 Coastal Master Plan would better address direct and indirect impacts of the Morganza system than a mitigation bank while also helping rebuild the protective wetlands outside the system. In addition, restoration of wetlands in this area could help protect communities left outside the levee system. We urge the Corps to reconsider the Isle de Jean Charles mitigation sites which are in the footprint of the Eastern Terrebonne Landbridge-East project selected in the 2023 Coastal Master Plan. By working with CPRA, other funds may be leveraged to help reduce the costs and risks needed to meet mitigation needs.

USACE Response: Comment acknowledged.

22.4 Topic: Compensatory Habitat Mitigation

Comment Summary: The Houma Navigation Canal Lock Complex is a large-scale flood protection, navigation, and hydrologic restoration project. This project is currently under construction with funds from the Resources and Ecosystems Sustainability, Tourist Opportunities, and Revived Economies of the Gulf Coast States Act (RESTORE). Part of Morganza, the primary goal of this project is to reduce saltwater intrusion, restoring historic salinities by retaining fresh water in the Terrebonne Basin. Despite the source of funding and the stated primary goal of the project, little analysis has been done to optimize the benefits of permitted operations to enhance the health of wetlands inside Morganza. Hydrodynamic models exploring the environmental benefits of the project by Hanegan et al. 2022 (attached) found that the lock structure could provide ecosystem benefits, benefits which may be further enhanced through the operation of nearby gated structures. We ask the Corps to work with CPRA to explore the operation of HNC to enhance existing wetlands to offset the projected impacts of Morganza.

USACE Response: Comment acknowledged. Once the duration and frequency of HNC Complex operations to meet flood risk management goals and ensure conditions necessary to support the area's freshwater treatment plant's operations are understood, consideration of operational changes at the complex would be evaluated to see what additional environmental benefits could be captured.

22.5 Topic: Compensatory Habitat Mitigation

Comment Summary: In-Basin Mitigation. The tentatively selected mitigation site identified for freshwater marsh is in the Delta Farms' area of the Barataria Basin. In-basin mitigation is preferred in order to replace the lost habitat and ecological functions. However, loss of marsh in the Delta Farms' area has increased the vulnerability of the eastern flank of the levee system. Restoration in this area would address impacts to freshwater wetlands from the project and also increase the resiliency of the system to storms.

USACE Response: Comment acknowledged. Consistent with the service area established for mitigation banks under the USACE's 404 Regulatory Program and the State's In-Lieu-Fee Program, the watershed used for mitigating impacts to tidal marsh was the Deltaic Plain.

23 Schultheis, Matt (Revier US/HAULR)

23.1 Topic: Borrow Sites and Hauling

Comment Summary: The commenter states that borrow material is a commodity and that the primary drivers of cost growth are not the material itself, but the logistics associated with hauling, including dispatch inefficiencies, idle time, unverifiable quantities, long haul distances, and risk premiums embedded in contractor pricing. He notes that the Morganza to the Gulf system spans nearly 100 miles and relies on multiple borrow pits located near active construction reaches, making efficient coordination essential.

USACE Response: USACE concurs that efficient coordination is an important element in borrow acquisition for this project.

23.2 Topic: Borrow Sites and Hauling

Comment Summary: The commenter describes HAULR, a construction logistics platform designed to provide project owners with real-time visibility and control over hauling operations, including dispatch, load tracking, quantity verification, and progress monitoring. He states that owner-side use of such systems can reduce inefficiency, improve productivity, shorten construction timelines, strengthen audit defensibility, and support local economic development by enabling participation from local trucking operators. The commenter clarifies that his remarks are offered in the context of feasibility and cost realism rather than procurement. He encourages the Corps to consider owner-side logistics systems such as HAULR as practical tools to reduce costs, accelerate levee construction, and support local economies throughout the life of the Morganza to the Gulf Project.

USACE Response: Procurement of logistics systems would be the responsibility of construction contractors rather than USACE.

24 Turner, Eugene R.

24.1 Topic: Indirect Wetland Impacts

Comment Summary: Indirect impacts on wetlands are underestimated. On page 213 of the main report, I believe the analysis significantly underestimates the indirect effects of flood protection measures on wetlands inside the levees. The report does not acknowledge that land loss rates have been declining, and it

relies on a 1998 source that I feel is outdated. In my view, the decline in land loss is tied to reduced canal dredging, which creates a much smaller levee effect than what is proposed in this project. I am concerned that continuous levees will create hydrologic stress on wetland plants—through waterlogging, drying, reduced organic matter accumulation, and increased erosion—and that these indirect effects will cause wetlands inside the levees to convert to open water.

USACE Response: Based on ongoing indirect WVA analyses that will be included in the Final SEIS, indirect impacts on wetlands would be minor because the project would maintain existing tidal fluctuation through environmental control structures. The results of the indirect WVA analysis will be included in the Final SEIS. Gates would only be closed in the event of oncoming major storms and water level triggers (see Section 3.3.7 for more details about the draft operations plan). Land loss rates were calculated from 1985 to 2020 for the WVA analyses, as described in Appendix D Wetland Value Assessment Models and Assumptions.

24.2 Topic: Wetlands-Cause

Comment Summary: Canal dredging causes indirect wetland loss. Based on the figures I provided in my attached PDF letter (Fig. 1A and 1B), as well as long-term studies of the Mississippi and Niger River deltas, I believe there is strong evidence that dredged canals drive substantial wetland loss. Research shows a dose-response relationship between canal area and land loss over 60 years, with a legacy effect where land loss increases over time. I interpret these findings to mean that levees built along dredged canals have historically caused most of Louisiana's land loss. Because of this, I am concerned that building new levees will lead to significant wetland loss inside the levee system and undermine billions of dollars invested in restoration.

USACE Response: Concur that canals have contributed to wetland loss in the project area. The USACE is developing additional WVAs that will assess long-term impacts of the proposed levee system both on the protected and flood sides of the proposed levees. Those results will be included in the Final SEIS. The report will be included in Appendix D Wetland Value Assessment Models and Assumptions. The preliminary results of this analysis are included in the Draft SEIS in Section 6.3.2.2.

24.3 Topic: NEPA Process and Document Clarity

Comment Summary: The study appears to be incomplete. On page 20 of the main report, the document states that any measure affecting cultural resources, wetlands, threatened and endangered species, oyster grounds, pipelines, or hazardous materials was screened out. However, on page 213 the report also states that the Corps has not yet fully identified historic properties or determined how the project may affect them. This inconsistency makes me question whether the analysis is finished.

USACE Response: USACE clarifies that the screening process referenced in the SEIS applies to the development of project alternatives, not to the identification of historic properties under Section 106 of the National Historic Preservation Act. Identification and evaluation of historic properties is an ongoing process that continues through final design. The SEIS accurately reflects the status of cultural resources investigations at the time of publication.

24.4 Topic: Geology-Faults

Comment Summary: I am concerned that the document does not discuss geological fault zones, even though they are common throughout the coastal region. I believe the report should address where these faults are located relative to the proposed levees and evaluate whether fault movement could compromise levee integrity. Since the main report does not include this information, I feel this is a significant omission.

USACE Response: USACE evaluates geological conditions, including faults, during geotechnical investigations for levee design. Known fault locations and subsurface conditions are incorporated into stability analyses and foundation design. The final design process will include additional subsurface investigations to ensure that levee structures are compatible with local geologic conditions and that potential fault movement does not compromise system integrity.

25 United Houma Nation

25.1 Topic: Tribal Resources

Comment Summary: The historical mapping for the Morganza Project is inaccurate and does not reflect the 1800s documented history of the United Houma Nation. In contrast, the Isle de Jean Charles, Grand Caillou/Dulac, Pointe-au-Chien, and Lafourche Band of Indians were organized in the mid-1990s. Any suggestion otherwise misrepresents the historical record of our Houma People.

USACE Response: USACE thanks you for your comment. Figure 5.5, entitled, "*Louisiana State Recognized Tribes within the watershed and Morganza to the Gulf Study Area*" was intended to graphically illustrate the location of living tribal communities within the project area. In general, datasets used to generate maps presented within the SEIS were obtained from public sources or agencies. In this case, the Tribal Designated Statistical Area map was obtained from the US Census Bureau's 2020 dataset. Inaccuracies that are identified to exist within that dataset can be reported for correction to the original source. If there are historical maps or datasets that USACE should consider or include in the SEIS, please inform the USACE.

25.2 Topic: Tribal Resources

Comment Summary: Indian mounds have no connection to federal recognition. They are sacred Indigenous sites of cultural, historical, and spiritual significance and must be protected regardless of fed status, incl. protective measures such as ring levees. The Morganza Project began on Island Road, but later shifted, leaving behind a living community that still depends on these lands and waters and has a business. Land loss was not caused by our people, but by levees, MS River alterations by the USACE, and decades of oil and gas activity imposed without adequate mitigation. Federal recognition is irrelevant to these impacts and responsibilities.

USACE Response: USACE thanks you for your comment. The tools available to USACE to identify cultural resources of any type and age, to assess effects, and to define mitigation, are defined by the National Historic Preservation Act. A Programmatic Agreement (PA) per 36CFR800.14 has been developed to obligate that USACE identify all cultural resources – including Tribal Lands or Ancient Mounds – and coordinate if adverse effects may occur as a result of MTG. Mitigation for loss is not defined in advance of consultation and coordination but will be agreed by formulation of a Memorandum of Agreement (MOA) between interested parties.

26 Vicidomina, Francis

26.1 Topic: Alternatives, Benefit-Cost Ration

Comment Summary: The project is not cost-effective. I believe the project, in its current configuration, is a colossal waste of money. In my view, the miles of parallel levees and floodgates on the outlying bayous do not provide enough flood-damage-reduction benefits to justify their cost. I agree that protecting the City of Houma is necessary, but I do not think the benefits associated with Houma should be used to justify the additional outlying levees and floodgates. Based on my concerns about cost and limited benefits, I believe the project should be reduced to a levee, floodgate, and pump station system focused solely on protecting the City of Houma. I do not think the outlying levee alignments are warranted.

USACE Response: The project's scope reflects congressional authorization to deliver a comprehensive, system-wide level of protection. Limiting the project to only the City of Houma would not meet the project's authorized purpose.

26.2 Topic: Design and Structures (Culverts, Gates, Bridges)

Comment Summary: I do not support the currently proposed sector-type gates, which I believe are far more expensive than barge-type gates. I think barge-type gates should be considered for the current project as well. I understand that

reduced-level levees and barge-type gates used solely for environmental enhancement are not currently authorized under this project. If these features are pursued, I believe they would require additional, specific authorization.

USACE Response: The proposed design for the authorized project was established in the 2013 Post-Authorization Change Report and is incorporated into the SEIS by reference. As part of current planning, engineering, and design efforts, levees and gates are being evaluated and updated to consider operational, navigational, long-term operations and maintenance, and continuing environmental impacts within the Chief of Engineers' discretionary authority. If future design changes exceed the Chief of Engineers' discretionary authority, a Post-Authorization Change Report would be required, which could lead to a reformulation process.

27 Wynne, Michael

27.1 Topic: Induced Flooding Impacts

Comment Summary: Looks to me you minimize the induced flooding impacts of the proposed work by starting with the existing non-federal levee system as non-project alternative. So, when you calculate the "with project" alternative's impact on water levels outside the levee, you are identifying the increase in surface water elevation as compared from the existing system (12-15 ft generally) to the final lifts. This appears to be a segmenting problem. The quantitative impact of the non-federal levee system on induced flooding should be evaluated under the updated models, along with the increases with the betterments from the proposed project lifts.

USACE Response: The comments pertain to Section 6.2 of the SEIS. The USACE agrees—the non-federal levee system impacts were indeed evaluated and presented under the No Action Alternative (future without project) maps. These maps depict the impacts of the non-federal levee system under base years 2035 and 2085. The impacts for federal impacts are addressed quantitatively--the inducement section states the proposed action is 4.2 feet near Reaches K and L, as compared to the No Action Alternative. Impacts are also shown in bar charts for communities affected outside of the system by comparing them, without project, and with project water levels, and the differences or additional water that would be added. In this way, the SEIS discloses the increases with the betterments from the proposed federal project lifts.