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August 16, 2023

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U.S. Army Corps of Engineers – New Orleans District
c/o Amy Dixon
CEMVN-PMR-C
7400 Leake Ave.
New Orleans, LA 70118

I OPPOSE St Tammany Parish, Louisiana Feasibility Study CEMVN-PMR-C

To USACE c/o Amy Dixon CEMVN-PMR-C and all concerned with this application for St. Tammany Parish, Louisiana Feasibility Study with a levee proposed in area of Bayous Liberty and Lacombe which are both Louisiana state-designated scenic streams. I live upstream on Bayou Liberty where the bayou is narrow in width but deep, wild, and beautiful, providing vital drainage for a large basin. This property is located in East St Tammany Parish. We do not want "channel improvements". I OPPOSE this St Tammany Parish, Louisiana Feasibility Study.

In 1984, my husband Aynaud Foster Hebert, MD, and I bought our property, at the above address, located on the east bank of Bayou Liberty, and have seen the increasing water levels adversely affect our historic property during subsequent years. I am writing to object to "feasibility study" to build a levee which may hurt us if the wind blows from the wrong direction. I suggest preserving wetlands without change, in their natural state, described for this project for the following reasons:

(1.) Applicants Have Not Shown There Are No Practicable Alternatives to the Wetlands Site.

Contrary to federal law, 40 C.F.R 230.10 (a), applicants have not met their burden of showing there is no practicable alternative to building Levee in the Bayou Liberty basin that is already overwhelmed by development.

Applicants' project is not effective if hurricane blows from certain directions, and practicable alternatives are presumed to be available unless clearly demonstrated otherwise, 40 C.F. R. 230.10(a)(3).

Many failed and empty commercial sites have already been paved over in nearby sites along US Hwy 190 Gause West and both sides of Northshore Blvd, including multiple strip malls and huge Northshore Square Mall with leveled movie theatre site adjacent to I-12. Why not remodel these commercial sites at these already filled and paved sites which include huge paved parking lots?

There are clearly practicable alternative sites for the proposed levee and for this reason the application should be denied.

(2.) Environmental Impact Study is Required.

The altering of wetlands for construction of levee will have a significant negative effect on drainage in the Bayou Liberty basin and will increase flooding of some structures if cut-off from the outflow into Bayou Liberty. Flooding must also be considered for long-standing adjacent residential properties both downstream and on the west bank of Bayou Liberty, the already flood-prone Victoria Park houses.

Cumulative effect of destruction of wetlands must be considered for this proposal in view of previously permitted destruction of wetlands in the Bayou Liberty basin for building of Wal-Mart, Sam's Club, and Target Stirling shopping center for which the US Army Corps of Engineers issued permits for filling of wetlands along Bayou Liberty before Hurricane Katrina.

Combined with the Corps' previous permitting for these stores, alteration of wetlands and Bayou Liberty channel for this proposed levee would be a "major federal action'' significantly affecting the quality of the human environment, and as such triggers the requirement of an environmental impact statement pursuant to the National Environmental Policy Act, 42 U.S.C. 4332(2)(C).

(3) Applicants Have Not Submitted Hydrology Study-plan and Certification That Run-off Will Not Be Increased By the Proposed Levee.

It is particularly important that applicants comply with local law requiring hydrological studies and measures to control runoff because Bayou Liberty's capacity is already exceeded in major storms.

The experience of long-time residents along Bayou Liberty, including families living downstream of the site for which applicants seek a permit, is that water in the Bayou overflows its banks much more regularly in moderate storms and that homes that never flooded in the past are now subject to flooding in heavy storms. This is due to increased development in the Bayou Liberty basin.

The experience of long-time residents is borne out by the only study of drainage problems in the Bayou Liberty basin, the ''Master Drainage Plan, '' dated June 1983, prepared by Burk & Associates for the St. Tammany Police Jury. The 1983 Master Drainage Plan focused on the eastern portion of St. Tammany Parish; the portion of the Plan dealing with the Bayou Liberty basin is included in this mailing. The Plan studied the hydrology of the drainage basins in the eastern portion of the Parish, and evaluated the present capacity of the various drainage channels and the required capacity of the channels in a 10- year rain event in light of projected development patterns over the next 25 years (pages 75-79). The data is summarized in Table 9 (page 80) and the data for Bayou Liberty is as follows:

BAYOU LIBERTY

Design Point (location)	Present Capacity (cfs)	Required Capacity (cfs)
Journey Road	50	2525
Royal Golf Course	410	3059
Scenic Street	1172	3668
North of I-12	972	3692
North of Hwy 190	948	3692
Sylve Road	2198	4165
Oak Ridge Ave.	4004	4462

	Present Capacity (cfs)	Required Capacity (cfs)
Christi Ann Lea Subdivision	2973	4687
Bayou Liberty Road	3054	4812

The data for the Bayou Liberty basin may well underestimate flooding in a 10-year event because the 1983 Master Drainage Plan land use projections for the Bayou Liberty basin do not appear to have anticipated the enormous development in the Bayou Liberty basin north of US Hwy 190 and north of Interstate 12.

There is risk that the proposal may increase flooding if the wind blows from a direction, from which levee does not give protection, rather such a levee may trap water along Bayou Liberty properties. Environmental impact statement is required before a decision is made on this project.

(4) Effect On Historic Properties and Community Must Be Considered.

The Corps must also take into account the adverse effect of proposal on the historic properties and historic community in the lower Bayou Liberty basin.

Physical destruction or damage attributable to increased flooding would have an adverse effect on the historic properties. The oldest homes are located on the highest ground along the Bayou and for the most part have been spared flood waters other than Hurricane Katrina. But with increased development will come further increases in stormwater runoff, particularly in the case of large developments such as the multi-family residential development proposed by applicants. It is only a matter of time, if development continues unchecked, before the historic properties along the Bayou will also flood.

In addition, the development's negative impact on water quality would be an alteration of the historic properties' setting. These historic properties owe their location to the Bayou, and for the Bayou to become polluted due to development adversely affects their character.

As noted in the St Tammany Parish's 1983 Master Drainage Plan, prepared by Burk & Associates, (pages 4-6), the area which is now the City of Slidell was settled in the mid-to-late 1800's, but the lower Bayou Liberty area was settled even earlier, beginning in the first half of the 1700's, shortly after the French founded the City of New Orleans. In fact, ''Bonfouca'' was the first recorded (1740) European place name on the north shore of Lake Pontchartrain (see excerpt, sent with this letter, from ''St. Tammany Parish: L'Autre Cote du Lac'' by Frederick s. Ellis, at page 37). The community of Bonfouca was located adjacent to the site of St. Genevieve Church where Highway 433 (Bayou Liberty Road) crosses Bayou Liberty, and in fact this place name is still used on maps of the U.S. Geological Survey. The Diary of Francois Sidoine Pichon (one volume, written in the original French, can be accessed at library of Tulane University) documents life at Bonfouca on Bayou Liberty in the years 1848 to 1886. There are existing homes in the lower Bayou Liberty area dating from the late 1700's and early 1800's, as listed below.

It should be noted that before the arrival of Europeans, Native Americans lived on the north shore of Lake Pontchartrain. The Acolapissa preceded the Choctaw. At the St Tammany Parish Library, Covington, Louisiana, The St. Tammany Historical Society's Vol 7, December 1986, ''Chahta-Ima and St. Tammany's Choctaws'', by Blaise C. D'Antoni, documents the presence of Choctaw people on Bayou Liberty in 1736 and notes the site of a Choctaw trading post in the 1760s where the Boy Scouts of America, Camp Salmen, was later located. This old trading post is listed by owner St. Tammany Parish as "Camp Salmen House" on the National Register of Historic Places. This old trading post, also commonly referred to as "Camp Salmen Lodge", is part of Camp Salmen Nature Park, owned and operated by St. Tammany Parish. Obstruction of drainage via Bayou Liberty or tidal surge trapped by proposed levee could this historic Camp Salmen (Lodge) House (trading post) listed on the National Register of Historic Places, part of Camp Salmen Nature Park, and the whole park may be adversely affected.

The focal point of the Bonfouca community was and is the St. Genevieve Church on the west bank of the Bayou Liberty amid enormous old oak trees. The first St. Genevieve Church was a small brick chapel built in 1852-1853 by Madame Anatole Cousin, the former Camille Pichon who was the daughter of Genevieve Dubuisson and Francois Pichon. The famous Abbe (Pere or Rev.) Adrian Rouquette, priest, poet and friend of the Choctaw -- called Chahta-Ima (''like a Choctaw") by the Choctaw -- was a nephew of Anatole Cousin. Rev. Adrian Rouquette often celebrated Mass at St. Genevieve. Among those who attended services at St. Genevieve were Choctaw Indians. The small brick chapel was replaced with a larger wood and brick church in 1914. Both the brick chapel and its graceful replacement faced the Bayou which functioned as a ''road'' in earlier times; people came to church by pirogues and skiffs. In 1958, the third St. Genevieve church was built and reoriented to the land road, now Louisiana Hwy 433;

this 1958 church was badly damaged in Hurricane Katrina. The Archdiocese of New Orleans authorized the building of the current fourth St. Genevieve Church which now stands on the same site, thanks to the contributions of dedicated St. Genevieve parishioners, post-Hurricane Katrina. The brick foundations of the first two St. Genevieve Church structures are visible today beneath the towering oaks between the Parish Hall and a small brick chapel built in modern times. A history of St Genevieve Church and site is included with this letter.

Today, the area around the Church bustles with activity: parishioners attending Church functions, people fishing on the pier maintained by the Church, traffic going over the adjacent Bayou Liberty bridge. The church bells and the horn announcing the opening and closing of the bridge for boats can be heard at homes up and down the Bayou. St. Genevieve Church is located on historic high ground known as La Butte Dominique. Increasingly, as development has taken place upstream, the banks of Bayou Liberty around the Church are littered with trash in the aftermath of heavy rain storms.

The Dubuisson Cemetery, also located on the west bank of Bayou Liberty at the end of West Dubuisson Road, was established in 1821. The inscriptions on many of the oldest tombs are in French. For example, one reads: 11 Ici repose Genevieve Isabelle Dubuisson, Veuve Francois Pichon, nee Pascagoula, le 6 Avril 1783, morte a Bonfouca, le 12 Septembre 1844" (here lies Genevieve Isabelle Dubuisson, widow of Francois Pichon, born in Pascagoula, April 6, 1783, died at Bonfouca, 12 September 1844). All the families who have settled the area for almost two hundred years are represented in the cemetery (Dubuisson, Pichon, Galatas, Faciane, Cousin, Narcisse, Doucette, Madison, etc.) Originally, funeral processions came up the Bayou from St. Genevieve Church by pirogue or other types of boats, including schooners. The cemetery was flooded in May 1995. A few tombs floated loose in a tropical storm in 2001, but many tombs floated far downstream in Hurricane Katrina 2005, with difficult recovery and identification. Long-time residents express concern for her family members' graves due to high water levels flooding the Dubuisson Cemetery, occurring more frequently to the present time July 2020.

The Pena Home on the west side of the Bayou is an Acadian cottage that may date from late 18th century or early 19th. It has been in the Pena family since it was built, and Diane Pena and their children, the current residents, are at least the 5th generations of Penas to live in the house. Several years ago, the Louisiana Historical Society approached the family about taking the house over, but the Penas turned them down. Diane Pena says that the house is located on a high spot but did flood with Katrina. Ms. Pena says that after heavy rains, the quality of the Bayou water has been negatively affected by runoff from development upstream.

The 1760 Carriere-Dubourg House, also called "Bright House", is located just downstream from Camp Salmen on the east bank of Bayou Liberty, and is listed on the Historic American Buildings Survey (HABS) of the 1930s. The Galatas Home was badly damaged by Hurricane Katrina. The Galatas home was located on the east side of Bayou Liberty at the Bayou end of Faciane Road.

The Francois Cousin House is now owned by Lowry-Collins family; it is located on the west bank of Bayou Liberty off Gwin Road. This historic Francois Cousin House, listed on the National Register of Historic Places, is a bayou cottage of brick-between-post construction built between 1787 and 1789 (as documented by the state of Louisiana in records maintained at the Cabildo). The property was deeded to Francois Cousin by Spanish land grant. Cousin was one of the largest landowners in the area, and the site of the Lowry home was once a brickyard and a lumberyard. In more than two-hundred-year history, the Bayou comes closer and closer to the house in major storms. Water in any of these historic homes

can cause sure destruction of interior hand-made bricks as well as bousillage (mud, lime and deer hair). Bricks made on this site were used to build the St. Louis Cathedral in New Orleans.

Also listed on the HABS of the 1930s, located on the west bank of Bayou Liberty, is “The Pink House” dating from early 1800's, brick-between-post, made with bousillage.

The Dubuisson-Whitney-Williams Home, ''Kindelwood,'' on the east side of Bayou Liberty off Bayou Liberty Road is a Creole home built between 1800 and 1815. The site was originally a brick factory. The house flooded in May 1995 and Katrina.

The historic Dubuisson land grant site, later owned by descendants of Francois Cousin, is now called “Tranquility” located on the west bank of Bayou Liberty. The main house contains brick-between-post original core dating back to Spanish land grant to Francois Dubuisson in 1788. Dubuisson descendants transferred the property to Cousin descendants, then subsequent succession of owners to present, with increasing frequency of high water levels on Bayou Liberty threatening the historic mansion.

(5) The negative effect of the filling in the wetlands upstream is associated with increased flooding in the Bayou Liberty basin below the proposed site and CANNOT BE COMPENSATED FOR by mitigation payments to purchase or preserve wetlands OUTSIDE OF the BAYOU LIBERTY BASIN.

(6) Applicants have not specified any measures to control ''non-point source pollution'' -- construction runoff, erosion, and post- construction runoff of pollution from the parking lots-~ which if not controlled will damage the water quality of Bayou Liberty.

(7) The water quality of Bayou Liberty has declined as development has taken place in the basin. Long-time residents have seen the waters of the Bayou muddied by development and filled with trash.

If applicants submit significant additional information on any of the issues raised in this comment or any other issue, the Corps should permit the public an opportunity to comment by reissuing the public notice and reopening the comment period, 33 C.F.R. 325.2(a)(1). The issuance of a bare bones public notice and minimal details with respect to the drainage plans and other plans of applicants, without an opportunity to comment on further submissions from applicants relevant to the ultimate decision of the Corps, would deny due process.

Applicants' proposed project will have major effects on the surrounding area, and the Corps should hold a public hearing on the permit application. Thank you for your attention.

Sincerely,

Jeanne A. Stangle, MD
(also known as Mrs. Aynaud Foster Hebert)
Bayou Liberty resident