Mentab, Inc.
[redacted]
Metairie, Louisiana 70055

August 31, 2023

By Mail
U.S. Army Corps of Engineers, New Orleans District
Attention: Chief, Environmental Branch
7400 Leake Avenue
New Orleans, Louisiana 70118

By Email: sttammanyfs@usace.army.mil

Re: Request for Public Comment

Mentab, Inc. (Mentab), a corporate entity, along with its respective shareholders, hereby submits this public comment in **opposition to the Optimized Tentatively Selected Plan (OTSP) for West Slidell** proposed in the St. Tammany Parish, Louisiana Feasibility Study – Revised Draft Integrated Feasibility Report and Environmental Impact Statement (RDIFR-EIS "Report") prepared July 2023 by the U.S. Army Corps of Engineers (USACE). We are opposed to the natural environment impacts and the economic and real estate impacts of the proposed levee placement to Mentab's land and other rural land lying between Slidell and Lacombe.

Background

The land on which the West Slidell levee ties into high ground is property owned by Mentab. Mentab is a family corporation owning land passed down through family members for over 200 years. The proposed levee in West Slidell - west of Bayou Paquet and south of So. Tranquility Road - runs through the middle of our property. **Mentab's property represents approximately 11% or 2 miles of the 18.5 miles of levee and floodwall**. Likely, there are no other private landowners whose land is as materially impacted by this levee placement.

The levee path, as drawn in both 2021 and 2023, cuts through our land in a line following So. Tranquility Road and CC Road rendering 700 +/- acres of our land on the unprotected side of the levee. In addition, the levee as re-routed in 2023 was placed on top of our existing historical homestead built in 1829. The alignment change which placed the levee on our homesite can be seen by referring to Figure 4-6 page 141 of the

Main Report pointed to by the marker labeled “Reroute Alignment in Bayou Paquet Watershed”.

During the feasibility study process in 2020 and 2021, Mentab was not considered a stakeholder or informed of the numerous alternative paths being drawn through our property. In late July 2021 **after the first public comment period**, the USACE made a Request of Entry and Mentab became aware of the USACE plans for our private property. We were finally allowed a meeting with the USACE in July 2022. Nevertheless, the USACE has not addressed the ill-advised placement through this rural residential area or the issue of taking our land and the undesired consequences to the land west of the levee in the latest OTSP. The expropriation of our private land is unacceptable when alternative paths including Federal land are available and alternative nonstructural solutions are possible.

Adverse Economic Impact on Mentab Land Value

Our unimproved rural land that does not have major flood issues and which is good land available for future expansion of West Slidell is adversely affected by the proposed levee placement. Notwithstanding the undeniable negative impact of a structural levee on the natural land ecology, a levee in this location will have significant real estate and economic consequences. 80% of our landholdings will forever lie immediately outside the proposed levee system. Insurance on this land will be unobtainable, land resale value will decrease, and the future economic growth of this old established low density residential area with expansion potential in West Slidell will be damaged.

The taking of 2 miles or 50 +/- acres of land to construct the levee puts the adjacent 700 acres of Mentab’s land (80% of our acreage) out of commerce for St. Tammany Parish future development. It may be the USACE preference to construct the levee in the present alignment, but it does irreparable damage to all landowners’ properties south of Highway 190 and west of the proposed levee, rendering that land a flood plain.

Comments on Benefit-to-Cost (BCR) Analysis

The cost-benefit analysis (also referred to as the benefit to cost ratio (BCR)) used by the USACE has resulted in an adverse alignment for Mentab. For example, the land and homes west of the levee extending to Lacombe are being ‘screened out’ because of a low BCR. If this land is not screened out, the levee would not be running through our property.

Likewise, throughout the selection process the USACE has avoided placement on Federal Wildlife Refuge Land due to the higher cost of acquiring federal land and

mitigation requirements. Table 4-17 on page 142 quantifies the alignment cost impacts to the Refuge and Mitigation. If a levee system ran parallel to the Lake through Federal land, then the levee would not be running through our property.

Using parameters such as the BCR may not result in the best placement or meet the intended objectives of the plan for protection. The current placement merely hugs existing homesites on the West Slidell leg as evidenced by the floodwalls placed on the sides of homes at 32365 Bayou Paquet Road, 32271 Dumas Road, 32147 West Doucette Road, and 32060 and 32068 CC Road. It is our opinion that a well thought out placement based on topography has not been achieved in this proposal.

Conclusion

The current West Slidell levee placement, the desire to avoid building on adjacent Federal land, and the USACE's deferral of placement adjustments until the Pre-Construction Engineering and Design (PED) stage, only serves to increase our concern that the USACE is inflexible and resistant to public engagement. Statements regarding public sentiment in West Slidell are misleading in saying that the structural levee is well received in West Slidell.

There is an unpredictable reality of levee protection, and of hurricane and storm systems, and of the resulting damage to adjacent property. The impact of surge flooding in Slidell can be as much a result of levee protection across the Lake in New Orleans, or the absence of protection at the Rigolets, as it is of the surge event itself. For this reason, Mentab recommends and supports efforts such as the Lake Pontchartrain Barrier project which aims to protect the entire lake, its ecosystems, and all surrounding parishes.

Mentab also recommends and supports increasing natural protections and expending resources for water management – bayou clearing and dredging, channel improvements, culverts, restoration of marshland, etc. - so that placement of a structural levee does not run through this West Slidell area. The cost benefit analysis of using Natural Resources for protection has not been fully considered. There is an opportunity to protect the function and increase the resiliency of the ecosystem in West Slidell to reduce flood damage. For this reason, we recommend that a levee for East and South Slidell be designed separate from the plans for West Slidell.

In summary, we strongly oppose the proposed OTSP placement of the West Slidell Levee across our property without our input and without consideration of the environmental and economic impacts to Mentab's property.

If a levee is inevitable, we suggest two alignments for consideration in the PED phase.

1. West Slidell to Lacombe along Bayou Paquet Road – starting at Bayou Liberty and Keller Road, run the levee south of Keller Road and then parallel with the Lake south of and in line with Bayou Paquet Road. This levee placement would address the flooding on Bayou Paquet Road and protect residents on Keller Road and Bayou Paquet Road, in addition to the Pine Ridge Subdivision, Mayfield School, and other residents lying west of the OTSP. This placement would also protect future development plans for the North Shore corridor and Lacombe. A levee through Federal Wildlife Refuge Land is possible in this area.

2. The Local Landowner Alternative suggested earlier this year to the USACE – this alternative is the West Slidell 2021 alignment modified for neighbor concerns. The alignment places the levee south of Keller Road on the Refuge border and travels to high ground across the southern border/acreage of Mentab's property turning north on the west side of our property to the west side of the Pine Ridge Subdivision and further as deemed necessary.

Please direct any questions that you may have to Bob Menard or Leslie Sharkey. Amy Dixon has our contact information.

Sincerely,

LMSharkey

Leslie Menard Sharkey
Mentab, Inc.

Copies via email to:

- Colonel Cullen A. Jones, PMP, P.E. - Commander New Orleans District - USACE
- John Bel Edwards – Governor of Louisiana
- Steve Scalise - U.S. Congress District 1
- Bill Cassidy - U.S. Senator
- John Kennedy - U.S. Senator
- Paul Hollis - Louisiana House District 104
- Sharon Hewitt - Louisiana Senate District 1
- Arthur Laughlin - St. Tammany Parish District 11 Councilman
- Suzanne Krieger – St. Tammany Levee, Drainage, and Conservation District