

# RESTORE

## THE MISSISSIPPI RIVER DELTA



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May 22, 2020

Patrick Smith,  
U.S. Army Corps of Engineers,  
Regional Planning and Environment Division South,  
PDS-C, 7400 Leake Avenue,  
New Orleans, Louisiana 70118  
mvnenvironmental@usace.army.mil

**Re: Comments on the *DRAFT Supplemental Environmental Assessment 571 - West Shore Lake Pontchartrain Hurricane and Storm Damage Risk Reduction Levee System***

Dear Mr. Smith,

Restore the Mississippi River Delta Campaign (MRD) is a coalition of the National Audubon Society, the Coalition to Restore Coastal Louisiana, Environmental Defense Fund, the National Wildlife Federation, and the Lake Pontchartrain Basin Foundation, representing thousands of Louisiana members and supporters. The MRD works together to advocate for science-based restoration efforts in coastal Louisiana, and we are particularly supportive of large-scale restoration projects that revitalize Mississippi River Delta ecosystems. As organizations with long-standing interest in coastal projects and on behalf of our supporters, we are writing to comment on the points listed below:

- 1. The proposed alignment (Figure 1), closer to the railroad and lake shoreline, could affect the Manchac Landbridge Sediment Diversion Project (ID: 001.DI.100).** As currently envisioned in the Louisiana Coastal Master Plan 2017, the conceptual Manchac Diversion would divert up to 2,000 cfs through the Bonnet Carré Spillway west guide levee when the spillway is operated for flood control. The water would flow through a structure in the guide levee into a conveyance channel, which would carry the water northward, presumably via the I-55 borrow canal. An existing network of canals between the west guide levee and the I-55 borrow canal might have served as the basis for conveyance of this water absent a new levee. The current proposed alignment would necessitate building a new conveyance channel between the West Shore Lake Pontchartrain (WSLP) levee and the railroad. The Supplemental Environmental



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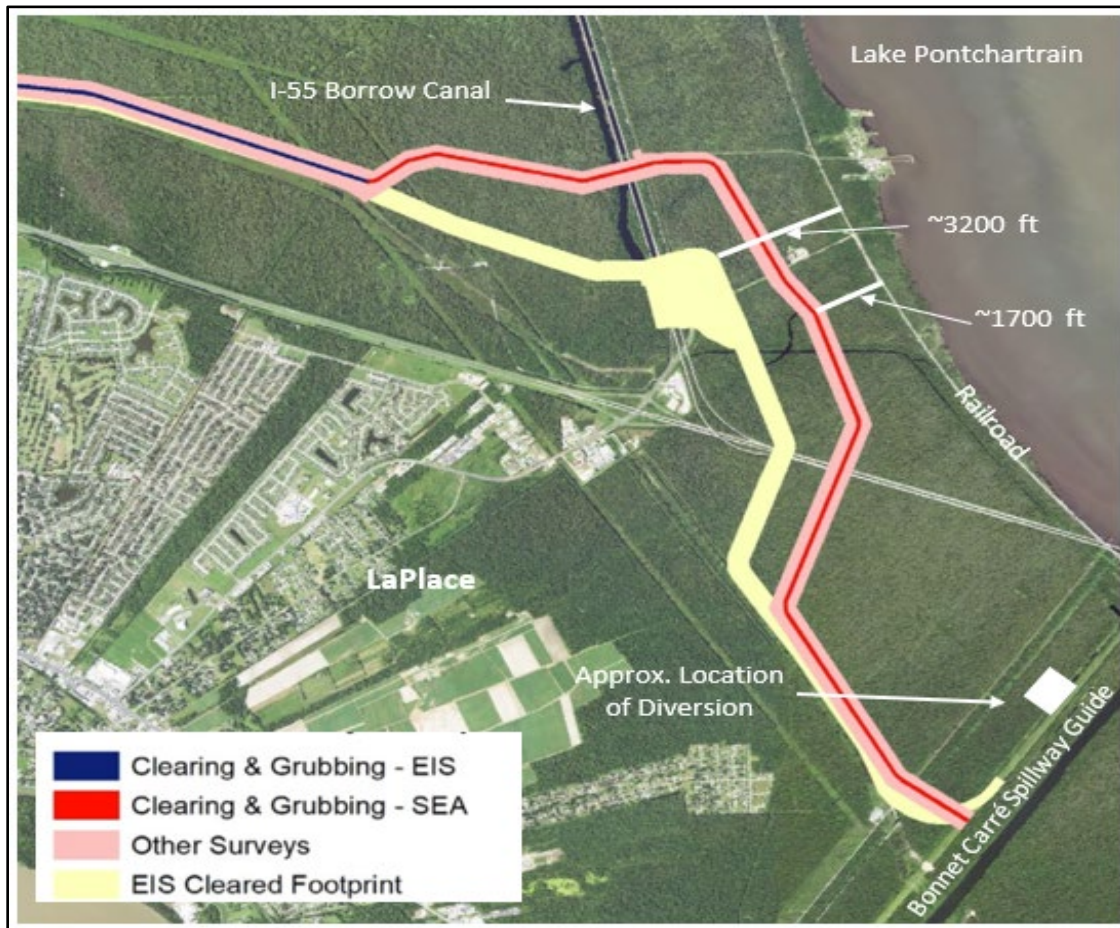
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Assessment (SEA) shows that the proposed alignment decreases that corridor width, with the narrowest point between the levee and railroad at about 1,700 ft (Figure 1). In the original alignment, the narrowest point between the levee and railroad was about 3,200 ft (Figure 1). Due to construction limitations and buffers near levees and railroad's right-of-way, this change in alignment will affect the Manchac Diversion project. We strongly urge early consultation with CPRA engineers to accommodate a future Manchac Landbridge Diversion.



*Figure 1: Proposed SEA 571 Alignment*





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The corridor can be further constrained for conveyance of the diversion flow due to possible restrictions of activities in the vicinity of the levee and the railroad. We would like to know:

1. What would be the distance from the crown of the proposed levee within which activity would require 408 approval? and
2. What distance from the railroad within which activities might be preclude construction for the diversion project?

Another complicating issue of the West Shore levee is the local gravity drainage features proposed through the levee. The Manchac Landbridge diversion would raise water levels on the protected side of the levee. This could have at least two negative consequences: backflow through the levee drainage structure raising water levels on the protected side of the levee, and closing the drainage structure to prevent back flow would prevent drainage on the protected side and raise water levels within the protected side of the levee.

To clarify our understanding, please describe the functionality of the drainage structure with the construction of the Manchac landbridge diversion.

2. **In Appendix VII, USFWS notes that any impacts occurring on LDWF owned property from WSLP should only be mitigated on LDWF property.** USFWS brings up the possibility of the River Reintroduction into Maurepas Swamp (RRMP) diversion project (ID: 001.DI.21) as mitigation for WSLP since many of the benefits of that diversion would accrue are on LDWF property. The RRMP project is slated for \$130 M in funding by the RESTORE Council, of which USACE is a member, but additional funds are needed. CPRA has requested that RRMP be used as mitigation for WSLP.

In response to our April 3<sup>rd</sup>, 2020, Mississippi River Commission High River Testimony (see attached testimony), Major General Toy responded (see attached response), *“The New Orleans District is currently developing the West Shore Lake Pontchartrain Mitigation Plan and evaluating innovative approaches to address mitigation requirements, including the Coastal Protection and Restoration Authority Board’s River Reintroduction at Maurepas Swamp. The New Orleans District’s technical evaluation of diverting Mississippi River water and nutrients*



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*into the Maurepas Swamp is scheduled to be completed in July 2020, at which time the Maurepas Swamp Project will be ranked against the other potential mitigation alternatives to determine which alternatives will be included in the WSLP Mitigation Plan.” We again strongly urge that this project be considered as mitigation for the WSLP project.*

3. **According to Tables 11 and 12 (page 37), overall, there is a decrease in the mitigation requirements between the 2016 EIS and the proposed action SEA by 110 AAHUs.** The proposed action increases the acres of swamp impacts from 9,596 to 10,892 acres, but it decreases the AAHUs impacts from 1,118 to 952. The proposed action increases bottomland hardwood impacts from 238 acres to 4,877 acres or 119 to 294 AAHUs. While we understand that AAHU and acreage calculations are being continuously refined, the language presented in the SEA is unhelpful, the tables are confusing, and no coherent explanation of the changes is presented to the reader. These metrics are important to understand the performance and/or impacts of a project and to delineate wetland mitigation requirements. We request the USACE explain this section in simpler terms and also state the assumptions made in calculating the ‘AAHUs,’ especially where the changes in ‘AAHUs’ decrease but the corresponding ‘Acres’ increase.
4. The WSLP project will impound wetlands, but its purpose is not to increase or induce future development. Indeed, given that those wetlands exist on the lowest elevations in the protected area, any conversion of wetlands for development purposes would reduce the risk reduction benefits of the project. For those reasons, and a host of other reasons grounded in ecological importance of wetlands, this project must be designed to maintain existing hydrologic conditions to the maximum extent possible. To do that, as the SEA contemplates, monitoring and responsibility for ongoing adaptive management of hydrology will be necessary. USACE, in coordination with the local sponsor, should set up a monitoring regime to ensure maintenance of wetland hydrology and healthy vegetation, and to allow adaptive modifications as conditions evolve to provide net benefits to impounded or semi-impounded wetlands.

In conclusion, we appreciate the opportunity to provide comments on this Supplemental Environmental Assessment document. We are pleased to see USACE continuing their in-depth efforts to study environment impacts for much needed projects. This process has already advanced coastal



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risk reduction and we hope it continues to push forward projects consistent with the State's Coastal Master Plan. We hope these comments underscore the importance of continuing environmental responsibility as we work together toward a sustainable coast.

Sincerely,

Brian Moore  
Legislative Director  
National Audubon Society

Kim Reyher  
Executive Director  
Coalition to Restore Coastal Louisiana

Natalie Snider  
Senior Director, Coastal Resilience  
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John Lopez, Ph.D.  
Director, Coastal Sustainability Program  
Lake Pontchartrain Basin Foundation

David Muth  
Director, Gulf Restoration Program  
National Wildlife Federation

