

Addendum to the Final Independent External Peer Review Report for the Lake Pontchartrain and Vicinity, Louisiana Coastal Storm Risk Management Project Draft General Reevaluation Report

Prepared by
Battelle Memorial Institute

Prepared for
Department of the Army
U.S. Army Corps of Engineers
Risk Management Center
Huntington District

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LIST OF ACRONYMS

DOI	Department of the Interior
DrChecks	Design Review and Checking System
EC	Engineer Circular
GRR	General Reevaluation Report
IEPR	Independent External Peer Review
LPV	Lake Pontchartrain and Vicinity
NPS	National Park Service
USACE	United States Army Corps of Engineers

1. INTRODUCTION

This document is an addendum to the Final Independent External Peer Review (IEPR) Report for the Lake Pontchartrain and Vicinity (LPV), Louisiana, Coastal Storm Risk Management Project Draft General Reevaluation Report (hereinafter: LPV Draft GRR IEPR) submitted on February 17, 2020, by Battelle. It was prepared to document activities associated with the IEPR Panel's review of the public comments on the LPV Draft GRR.

This addendum contains one additional Final Panel Comment (presented in Section 3) and briefly details the IEPR process that determined the need for, and led to the generation of, this comment. The Final Panel Comment in this addendum is numbered 11, continuing the Final Panel Comment numbering presented in the LPV Draft GRR Final IEPR Report, which stopped at Final Panel Comment 10.

2. METHODS

This section summarizes the activities associated with the review of the public and agency comments conducted for this project.

Battelle received electronic versions of the public comments from the U.S. Army Corps of Engineers (USACE) on February 10, 2020. The PDF file supplied by USACE contained 35 pages of comment letters from various state and Federal agencies, non-governmental organizations, and members of the general public.

In accordance with procedures described in the Department of the Army, USACE, Engineer Circular (EC) *Review Policy for Civil Works* (EC 1165-2-217)¹, Battelle focused the IEPR Panel's public comment review on assessing scientific and technical issues pertaining to the assumptions, data, methods, and models used in the project.

Each panel member was asked to independently determine whether the public comments contained any additional scientific or technical concerns about the project that were not previously identified, and that should be addressed by USACE in the LPV Draft GRR project documents. The Panel was charged with focusing on discipline-specific scientific and technical issues and not policy-related comments, per EC 1165-2-217.

The LPV Draft GRR IEPR panel members received the public and agency comments from Battelle on February 12, 2020. The panel members reviewed comment letters from state and Federal agencies as well as emails, letters, and comment cards from a variety of companies, non-profit organizations, and members of the general public.

The panel members were required to answer one charge question about the public comments:

- 1. Do the public comments raise any additional discipline-specific technical concerns with regard to the overall report?**

¹ USACE (2018). Water Resources Policies and Authorities: Review Policy for Civil Works. Engineer Circular (EC) 1165-2-217. Department of the Army, U.S. Army Corps of Engineers, Washington, D.C. February 20.

The panel members submitted responses to this charge question, and Battelle reviewed those responses to identify any issues, areas of potential conflict, and other overall impressions. Each panel member's individual comments were shared with the full Panel. Battelle then discussed and confirmed via email whether any of their identified issues should be carried forward as Final Panel Comments.

Based on the Panel's review, most of the public comments fell into the category of general support or opposition. By the end of the discussion, the panel members identified one issue within the public comments that needed to be addressed in order to strengthen the LPV Draft GRR. This issue is presented in Final Panel Comment 11 (Section 3).

All panel members reviewed and provided input on the issue discussed in Final Panel Comment 11. Battelle prepared this addendum and conducted a final review and edit of the Final Panel Comment for clarity and consistency. There was no direct communication between the Panel and USACE during the review and preparation of the Final Panel Comments.

Battelle will enter Final Panel Comment 11 into USACE's Design Review and Checking System (DrChecks), a Web-based software system for documenting and sharing comments on reports and design documents, so that USACE can review and respond to it. USACE will provide an Evaluator Response to the Final Panel Comment, and the Panel will respond via BackCheck Response to the Evaluator Response. The USACE and Panel responses will be documented in DrChecks.² Battelle will provide USACE and the Panel with a PDF printout of all DrChecks entries, through comment closeout, as a final deliverable and record of the results of the IEPR and the public and agency comment review.

3. FINAL PANEL COMMENTS

This section presents the full text of Final Panel Comment 11 prepared by the LPV Draft GRR IEPR panel members.

² Battelle is scoped with uploading the Panel's BackCheck Responses in DrChecks on behalf of the Panel.

Final Panel Comment 11

The Jean Lafitte National Historic Park and Preserve (Chalmette Battlefield and Chalmette National Cemetery unit) would be considered a significant historic resource and sensitive noise receptor, but these resources are not included in the LPV Draft GRR.

Basis for Comment

In a letter dated February 3, 2020, provided to USACE during the public comment period, the U.S. Department of the Interior (DOI), Office of Environmental Policy and Compliance, stated that the I-wall on the levee within National Park Service (NPS) lands of the Jean Lafitte National Historic Park and Preserve (Chalmette Battlefield and Chalmette National Cemetery unit) could potentially be impacted by proposed project activities. The letter further requests that Sections 4.11 and 4.13 and Sections 7.11 and 7.13 document the presence of the battlefield and cemetery, as well as any potential temporal or physical impacts related to visitors' use of the cemetery and battlefield.

Based on the NPS's *General Management Plan Amendment/Development Concept Plan/Environmental Assessment* (EA), the preferred alternative considered in that plan identified new structures envisioned on the levee in the area where flood wall improvements are proposed, and there could be impacts to the historic cemetery access road where a turnaround abutting the levee is envisioned (NPS, 2011; page 65). The EA also identified the location of the National Cemetery located within the Park grounds, which also abuts the levee.

The Panel believes that, in addition to the DOI concerns raised and actions requested in its letter, impacts to sensitive noise resources such as the Chalmette National Cemetery should be assessed, especially given its proximity to the levee improvements proposed. Cemeteries are generally considered sensitive noise receptors, and potential impacts from construction noise at the cemetery do not appear to be documented in Sections 4.15 and 7.15 of the LPV Draft GRR. Additionally, Sections 4.15 and 7.15 do not appear to contain information on how the proposed improvements at the levee at this location would affect the viewscape of the Grand Army of the Republic Monument, a significant landmark within the Chalmette National Cemetery.

Significance – Medium/Low

Without information regarding the Jean Lafitte National Historic Park and Preserve (Chalmette Battlefield and Chalmette National Cemetery unit), the assessment of historic resources and sensitive noise receptors in the LPV Draft GRR is incomplete, and it is uncertain whether an analysis of impacts to these resources would affect the implementation of the Tentatively Selected Plan.

Recommendations for Resolution

1. Revise Sections 4.15 and 7.15 to reflect the presence of this historic resource as a sensitive noise receptor, and document potential noise impacts from construction to the park, battlefield, and cemetery.
2. Revise Sections 4.12 and 7.12 to document the presence of the park and describe potential impacts to aesthetics and the view scape at the Chalmette National Cemetery.

Literature Cited

NPS (2011). Chalmette Unit. Jean Lafitte National Historical Park and Preserve. General Management Plan Amendment/Development Concept Plan/Environmental Assessment. National Park Service, Planning, Environment & Public Comment. Accessed February 17, 2020 from <https://parkplanning.nps.gov/document.cfm?parkID=387&projectID=12588&documentID=41115>.

4. REFERENCES

NPS (2011). Chalmette Unit. Jean Lafitte National Historical Park and Preserve. General Management Plan Amendment/Development Concept Plan/Environmental Assessment. National Park Service, Planning, Environment & Public Comment. Accessed February 17, 2020 from <https://parkplanning.nps.gov/document.cfm?parkID=387&projectID=12588&documentID=41115>.

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