



UNITED FOR A HEALTHY GULF

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RE: **MVN-2017-01217** - Southern Lifestyle Development, Templeton Ridge (**WQC 180823-02**)

Dear Mr. Crowe, Ms.Hill,

I am writing on behalf of Gulf Restoration Network (“GRN”), a diverse coalition of individual citizens and local, regional, and national organizations committed to uniting and empowering people to protect and restore the natural resources of the Gulf of Mexico. We have serious concerns about the application for a Section 404 Permit (**MVN-2017-01217**) and Water Quality Certification (**WQC 180823-02**) submitted to the United States Army Corps of Engineers (“Corps”) and Louisiana Department of Environmental Quality (“LDEQ”), respectively, by Southern Lifestyle Development (“Applicant”) for the Templeton Ridge subdivision (“Project”).

The Applicant requests Section 404 permitting and a Water Quality Certification (“WQC”) for its proposed construction of a multipurpose slab-on-grade development with parking (“Project”). The Project would remove many acres of forested wetlands from an highly vulnerable area within a heavily impacted watershed, in East Baton Rouge Parish. It is not in the public's interest to subsidize the increase of residential flooding by permitting this applicant to place 602 lots and even more residents in harm's way, while removing much-needed flood mitigation in the form of riparian wetland forest.

The Corps and LDEQ must demand the Applicant conduct an Area-Wide Environmental Impact Statement (“PEIS”) for cumulative impacts to hydrology and to wetlands of residential and commercial slab construction within the Amite watershed to gain further insight into the economic impacts of this sort of wetland destruction in the Amite watershed. This is beyond urgent, given the events of March 2016, the increasing likelihood of other such events, and the

extreme amount of repetitive-loss slab properties in East Baton Rouge Parish. Naming the site "Templeton Ridge" speaks to the deceptive nature of the development. We are beyond exhausted by our members being trapped into flood-prone housing.

Although the Applicant also proposes to buy credits from a mitigation bank to offset any unavoidable losses to wetland functions caused by project implementation, we are concerned about the inevitable indirect and cumulative wetland effects that may result from a project of this scale, and the abysmal lack of information on local hydrology and floodplain mitigation. All known mitigation banks will not mitigate floodplain impacts of this development, as they are outside this watershed.

Riparian impacts must be mitigated in-kind, with stream mitigation. There are tens of thousands of acres of abandoned mine sites upstream of this proposal that could serve as cost-effective stream mitigation and riparian lift.

No mention is made regarding how the residents of East Baton Rouge Parish would benefit from the Project, when the risks of displacing riparian flood mitigation are obvious. Community members are likely to be left with the usual unaccounted, externalized costs of the Project that come from reduced flood protection.

GRN writes this preliminary objection to the Applicant's request for a Section 404 Permit and WQC, and we ask The Corps and LDEQ to deny this request based on the following concerns:

SUMMARY

- 1. The Project is inconsistent with Louisiana's Comprehensive Master Plan for a Sustainable Coast and a 2016 Executive Order.**
- 2. Water dependence of the Project has not been demonstrated by the Applicant.**
- 3. Project Alternatives have not been addressed.**
- 4. Direct, indirect, secondary, and cumulative impacts must be fully considered.**
- 5. The Applicant must notify local floodplain officials of this permit, since the proposed site sits within an area vulnerable to flooding.**
- 6. The Public Notice fails to adequately describe the mitigation plan.**
- 7. The final plan, with mitigation plan included, should be made available to the public before any permits are granted.**
- 8. We question whether any wetland mitigation could completely replace the functions and values lost.**
- 9. The Project warrants a Programmatic, or Area-Wide, Environmental Impact Statement (PEIS).**
- 10. The Project does not appear to offer any public benefit or be in the public interest.**

In order to keep us and the public properly informed, we request notification of denials, approvals, and/or changes to the Applicant's request for a Section 404 Permit and WQC. As previously stated, we see pressing needs to conduct a PEIS and to hold a public hearing to fully weigh the continued impacts to hydrology and riparian forests in the Amite River watershed.

We look forward to a written response.

For a healthy Gulf,
[sent via e-mail]

A handwritten signature in black ink, appearing to read 'Scott Eustis', written in a cursive style.

Scott Eustis
Community Science Director

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