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## 5/29/2020

Lafayette City-Parish Consolidated Government through Lafayette City-Parish President Josh Guillory 705 West University Avenue Lafayette, LA 70506 *Via Certified Mail* 

The Honorable Clay Higgins U.S. Representative for the 3<sup>rd</sup> District of Louisiana 424 Cannon House Office Building Washington, DC 20515 *Via Certified Mail* 

Col. Steven Murphy U.S. Army Corps of Engineers, New Orleans District 7400 Leake Ave. New Orleans, LA 70118 *Via Certified Mail* 

## **RE:** Notice of Threat from Various Drainage Projects for Widening, Clearing, and Improvement Projects, Lafayette Parish

Dear Sirs:

We, the undersigned, and Dredge the Vermilion, Inc., on behalf of ourselves as well as numerous individual homeowners and business owners who reside and conduct business in Lafayette Parish and/or the City of Lafayette submit this correspondence to voice our concerns over a growing threat of future flooding. We have grave concerns over LCG's ongoing, proposed, and planned projects involving the deepening, widening, clearing, and other improvement of certain coulees, canals, drainages, and other water ways, throughout the Parish in recent months and years. LCG states that it has 77 such projects identified, 27 of which are presently in one stage or another of completion. This likely does not include other projects funded through other sources.

Significantly, these projects do not include any action for addressing the largest drainage artery of our Parish, the Vermilion River, or any of its natural flood plain and retention areas such as the Cypress Island Swamp. In essence, LCG's drainage projects are improving the ability of numerous waterbodies to carry water to the Vermilion, with increased volume and velocity, and the absence of any diversion or significant retention, while at the same time, nothing being done to improve the ability of the Vermilion to carry water north to the natural overflow in Cypress Island swamp or south to the Gulf. While we understand this is a complex matter, we believe that improving drainage around the Parish, without providing diversion or adequate retention before improving drainage on the Vermilion is only making a bad situation worse.

An example of this phenomenon is playing out in a recent project on Coulee Iles Des Cannes, near the Town of Scott. Since the flood of 2016, LCG has conducted a massive widening, deepening, clearing, and improvement project on Ile Des Cannes under the project CDBG-DR GRANT NO 28PARA3401 DRAINAGE IMPROVEMENTS TO COULEE ILE DES CANNES: FENETRE ROAD TO OLD SPANISH TRAIL. Worse yet, it appears that an additional \$2.4 million has recently been secured through the Federal Emergency Management Agency's Hazard Mitigation Grant Program for further improvements on Coulee Ile Des Cannes downstream of the completed portion referenced above.

One of the most disturbing aspects of the aforementioned Ile Des Cannes Coulee project, which was originally designed in 1986, is that it was undertaken without a serious study or analysis of the potential consequences for downstream interests faced with a drastic increase in the capacity and velocity of Ile Des Cannes. While there seem to be some obscure plans for the inclusion of a woefully inadequate detention pond at some point before Ile Des Cannes meets the Vermilion, there is no evidence of any funding, planning, or construction operations for same to date. Further, this project channelized an existing floodway, thereby removing some of the natural retention capacity the Coulee had prior to the project.

With regard to the effects Ile Des Cannes had *prior to* these improvement projects, attached for your review is a copy of an "Analysis of Ile des Cannes Impact on Vermilion River Levels" prepared at the request of Dredge the Vermilion and other interested parties, including input from hydrologist, Dr. Michael Waldon and Professional Civil Engineer Pamela Granger dated August 26, 2019. The document speaks for itself. As the report provides, the elevation gradient from the head waters of Ile Des Cannes to its confluence with the Vermilion River near Maurice is significantly greater than the elevation gradient on the Vermilion River from Lafayette to the its outfall at Vermilion Bay. Importantly, Ile Des Cannes drains an approximate 40+ square mile watershed on the western side of Lafayette Parish, thus, it carries a large volume of water in any rain event. Our failed efforts to receive from LCG a copy of any engineering analysis concerning the impact on the Vermilion River levels by the Ile Des Cannes widening and deepening project leads us to believe no such analysis was ever conducted.

The report concludes that this difference contributes to Ile Des Cannes "overwhelming" the Vermilion River during rain events, which results in the River back-flowing upstream and into

Lafayette. Significantly, this report indicates that this was the case in the August 2016 flood, **BEFORE THE AFOREMENTIONED DRAINAGE PROJECT OCCURRED**. This analysis clearly shows that these projects have only served to make a bad situation worse. We are deeply concerned that these past and future channel improvements will greatly increase the rate of flow in a waterway that is already overwhelming the Vermilion, and thus greatly exacerbate the problems as detailed in the attached report. It goes without saying that back flooding of the Vermilion into Lafayette poses a great risk to homes and businesses along the River and causes back-flooding into the many other tributaries that would otherwise flow into the River from the Parish and hence flooding along those tributaries.

As mentioned above, Coulee Iles Des Cannes is only one of many drainage projects which serve only to direct more water more rapidly into the Vermilion. Failing to address the Vermilion itself, or any of its retentions or natural overflow floodplains, will only serve to exacerbate the massive damages this community suffered in August of 2016 should a similar rain event occur in the future.

To highlight the emergent threat these sorts of projects are posing, we also attach an analysis of the effect that several rain events have had on the Vermilion since August of 2016. The most telling of the events referenced is the relatively minor rain event the Lafayette area experienced on May 14, 2020. As can be seen, on that date, the Acadiana area experienced a rain event with recorded rainfall of 4.5 inches at the Lafayette Airport and 1.5 inches recorded on the southern reaches of the Parish. While the recorded precipitation throughout the area varies, this is very typical spring rain event and is far less than the August 2016 event. Under any circumstance, the attached chart which is based off of River Stage recordings at the Surrey Street Bridge, reveals that within the matter of two hours, the Vermilion River rose by 3.5 feet to above flood stage! Further, within an hour and 15 minutes, the River went from flowing downstream at 1,000 CFS to reversing its flow toward upstream at a rate of 3,060 CFS! The other rain events referenced exhibit a similar and disturbing pattern. These figures are self-explanatory and are clearly a sign of things to come. It goes without saying that another rain event such as that of August 2016 would be absolutely devastating to this community. The figures on this chart suggest that even a much smaller rain event will be devastating. They further serve to bolster the purpose of this letter, which is to put LCG on notice that drainage improvement projects such as the Iles Des Cannes are making a bad situation worse.

We believe that LCG's continued efforts to improve drainage with projects such as those on Ile Des Cannes will inevitably result in dire consequences for property owners in Lafayette, St. Martin, Iberia, St. Mary, St. Landry, and Vermilion Parishes. Please allow this letter to serve as formal notice of the threat LCG's past and continued future drainage improvements to Coulee Ile Des Cannes and other drainage ways pose to the citizenry of this parish, as well as others in the future. These continued improvements will expose LCG to significant liability in the future, resulting from property losses and potentially personal damages. Furthermore, should these improvements lead to increased risk of flooding for property owners, LCG will or may face exposure for inverse condemnation takings and damages.

As citizens of this community, and speaking on behalf of many who have suffered flooding losses in the past, we strongly urge LCG to take immediate action to address this risk, including

ceasing all widening and clearing operations pending a valid and serious study of the consequences of same, and forthwith exercise all necessary care to prevent the harm that the attached report indicates will occur in a future rain event if projects such as this are continued through completion as presently planned.

Thanking you in advance for your attention to this matter, I remain

Yours very truly,

David Dixon President, Dredge the Vermilion, Inc.

Harold Schoeffler Vice-President

Brent Logan Secretary – Treasurer

Karen Hail Board Member

Thomas Guilbeau JD Board Member

Bob Hammack JD Board Member

Jeffery Svendson Board Member

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cc: Lafayette City-Parish Consolidated Government Legal Department 705 West University Avenue Lafayette, LA 70506 Lafayette City Council Through Council Members Pat Lewis, District 1 Andy Naquin, District 2 Liz Hebert, District 3 Nanette Cook, District 4 Glenn Lazard, District 5 P.O. Box 4017-C Lafayette, LA 70502

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Mr. Tony Robinson, Regional Administrator, Federal Emergency Management Agency, Region VI FRC 800 North Loop 288 Denton, TX 76209-3698

Honorable William K. "Bill" Fontenot Parish President, St. Landry Parish, La 118 South Court Street, Suite 113 Opelousas, LA 70570

Honorable Chester Cedars Parish President, St. Martin Parish, La P.O. Box 9 St. Martinville, LA 70582 Honorable M. Larry Richard Parish President, Iberia Parish, LA Courthouse Building 300 Iberia Street, Suite 400 New Iberia, LA 70560-4543

Honorable Dane Hebert President, Vermilion Parish Police Jury 100 North State Street Abbeville, Louisiana 70510

Honorable David Hanagriff Parish President, St. Mary Parish, La 5th Floor Courthouse 500 Main St. Franklin, LA 70538

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