**DEPARTMENT OF THE ARMY**
VICKSBURG DISTRICT, CORPS OF ENGINEERS
4155 CLAY STREET
VICKSBURG, MISSISSIPPI 39183-3435

REPLY TO
ATTENTION OF:

August 11, 2009

Planning, Programs, and
Project Management Division
Planning and Project
Management Branch

Mr. Billy Orr, Chairman
Rankin-Hinds Pearl River Flood
and Drainage Control District
P.O. Box 320069
Flowood, Mississippi 39232-0069

Dear Mr. Orr:

I refer to your letter of July 27, 2009, requesting the U.S. Army Corps of Engineers, Vicksburg District, clarify the linkage between the LeFleur Lakes Plan (Lakes Plan) presented in the February 2007 Preliminary Draft Report provided to the Rankin-Hinds Pearl River Flood and Drainage Control District (RHPRFDCD) and a plan (also referred to as the Two Lakes Plan) as developed by Mr. John McGowan. We will address the 2007 draft feasibility study itself later in this letter. You specifically requested further clarification on modifications made to the Lakes Plan during the study and the effects on the environmental impact of the project, level of flood protection, and cost.

Please note that the Corps did not study any Two Lakes Plan proposed by Mr. McGowan nor did we link Mr. McGowan's original proposal with the study of alternatives desired by RHPRFDCD. The Corps proceeded with the cost-shared feasibility study as described below.

Subsequent to signing the Feasibility Cost-Sharing Agreement (FCSA) in October 2003, between the Corps and RHPRFDCD and in accordance with the Project Management Plan (PMP), feasibility studies were initiated. The RHPRFDCD provided the majority of the 50 percent non-Federal share of the study cost by furnishing work-in-kind (WIK) via your engineering contractor, Waggoner Engineering, Inc. At the request of RHPRFDCD and as documented in the FCSA and PMP, studies were limited to only two alternatives--the National Economic Development Plan, which is a comprehensive levee plan, and the Lakes Plan.

During the course of the study from October 2003 through calendar year 2006, features of the Lakes Plan were modified at the request of your contract engineer and RHPRFDCD. The Corps consented and proceeded with such modifications since they did not change the overall concept of a Lakes Plan.

Any variation of a Lakes Plan has similar environmental effects. A Lakes Plan with an upper and lower lake encompassing approximately 5,000 acres is not likely to be environmentally acceptable as a Federal flood damage reduction alternative compared to the less damaging levee alternative. My letter of February 14, 2007, states ". . . the levee plan conforms to Federal environmental objectives with its significantly less adverse impacts.

As the feasibility study proceeded, hydraulic investigations indicated that flood stage reduction for the Lakes Plan decreased progressively as water moved downstream from the Ross Barnett Reservoir Dam. The flood stage essentially returned to existing conditions immediately downstream of the lower weir. Flood stage reduction from any plan with lakes is primarily due to stream channelization. Therefore, the Richland and South Jackson levee areas, which are both located below the lower weir, would not receive flood damage reduction from the Lakes Plan. Additionally, both Lynch and Town Creeks would flow into the lower lake. This area would also not experience any significant flood reduction. Flood damages in Lynch and Town Creeks could be exacerbated from the Lakes Plan, the result of large headwater floods meeting the permanent pool created by the lower weir. Studies indicated that the Lakes Plan alone would provide a 52 percent degree of flood protection as compared to 79 percent for the comprehensive levee plan.

During the feasibility study, the Corps and your contract engineer agreed to make the Lakes Plan analysis comparable, in terms of flood reduction, to the comprehensive levee plan. We first investigated continuing channel improvement downstream below the lower weir. These investigations indicated that channel improvements would need to be extended downstream a distance of approximately 13 river miles to near Byram to achieve the flood reduction comparable to the comprehensive levee plan. These results were presented to the RHPRFDCD Flood Control Committee in the summer of 2005. The investigation also revealed additional adverse environmental losses that would be incurred from this stream channelization. In view of these

findings, your engineer agreed that a better solution would be to study the inclusion of levees in Richland, South Jackson, and Town and Lynch Creeks. Pumps were also considered necessary in Town and Lynch Creeks due the permanent pool created by the lower weir. Costs for these levees and pump stations are estimated at approximately $160 million of the $1.4 billion Lakes Plan total costs. Economic feasibility would be little improved by removing these costs.

A decision has been reached to publicly release the 2007 preliminary draft feasibility study at this time. Because the study has not been acted upon by RHPRFDCD in over 2 years, it has lost the merits of protection sought by the deliberative process privilege. Under present policy of the current Administration, we cannot articulate any foreseeable harm to the agency if it is now released. Once publicly released, we will be able to discuss the preliminary draft feasibility study in open sessions with RHPRFDCD, if needed. This report and its findings have not proceeded beyond the preliminary draft phase or undergone any form of internal technical review or external peer review since RHPRFDCD has not notified the Corps of willingness to proceed.

As discussed during our meeting on December 4, 2006, and stated in my February 14, 2007, letter to you, we are available to discuss any remaining issues. If you need additional information or have any questions, please contact Mr. Gary Walker, Senior Project Manager (telephone 601) 631-5469).

Sincerely,

Douglas J. Kamien, P.E.
Chief, Planning, Programs, and
Project Management Division