

On June 27, 2014, the Corps of Engineers formally declared its final Record of Decision for the Westfield Boulevard Flood Wall as the alignment it will pay 75% of cost to complete its White River Flood Damage Risk Reduction Project.

This crosses the canal with a DPW flood gate and does not prevent washing out the canal berm at the 56th Street river bend during the design flood.

The City has said it will not participate in this alignment to complete the project.

However well-intended that position is, it is clear that many property owners in the 100-year flood plain are increasingly worried about significant loss of property values as federal flood insurance subsidies are reduced compared to significant gain if they are taken out of the flood plain. If the only ready-to-go option with federal funding is the Westfield option across the canal, it is likely that sooner or later that the earlier political pressure for the Westfield wall returns.

The strong opposition to Westfield Boulevard option last summer by many mid-town neighborhoods was on the assumption that they would be out of flood plain by the canal berm enhancement option. If they are not removed from the flood plain, that public opposition to Westfield option evaporates.

Since September 2013, the City has used the TAG general arguments that the option to put a flood wall outside the canal at the river bend and enhance the west bank of the canal for a short stretch south of 53rd Street would achieve all of the Westfield flood protection plus not require a flood gate across the canal.

Unfortunately, the technical resources the City has used to develop the argument to get the Corps experts to change their minds have not been adequate for that task. The formal design the City used to request an extension of the EIS public comment period was to enhance the canal tow path from Canal Boulevard south to 38th street, an unnecessary feat that would cost five or six times the cost of the Westfield Wall and therefore was dismissed out of hand by the Corps.

In the June Record of Decision, the Corps stated that the City has yet to provide it with adequate information about technical feasibility and economics of that alternative. The City strategy seems to expect the Corps itself to do the heavy-lifting of a serious technical and economic analysis.

The TAG recommended that Citizens Energy Group offer to pay for a consulting firm with special expertise and experience at working constructively with the Corps to do that heavy-lifting to assist the City's consultant. The task

should be to take the Corps' own design of a 3400-foot reinforced canal tow path and then answer the three technical questions the Corps raised. The Corps chose the Westfield Boulevard Flood Wall instead of doing a serious technical study of those questions 1) how deep is an I-wall needed to reinforce the canal berm, 2) how to remove trees from 15 feet of base of I-wall (which is inside west side of berm) without having the removed roots cause a break in the berm before its reconstruction and 3) for southern segments where no I-wall reinforcement is needed and the berm itself is satisfactory, how to make the slopes on both sides a shallower slope to FEMA specifications). In addition the design should consider what are the design options that are least intrusive on adjacent residential property owner properties? What are the costs of different choices? How far down the canal does the berm need to be for levee specs for 95% 300-y protection of project area (which is the land north of Butler University)? how far for 95% 100-year flood protection?

The task should also provide substantive legal and technical support to request the Corps to finish the project to the 95% 100-year flood instead of the 95% 300-year flood built so far. It is the 95% 100-year flood protection that removes properties from 100-year plain for FEMA flood insurance purposes. In this location that level of protection is popularly referred to as the "500-year flood." It is the right of the local partner to request a lower level of protection than the maximum that the federal agency would otherwise be allowed to engaged in. That would lower costs to local entities and expand flexibility of options.

The TAG recommends this study by special experts credible with the Corps be accomplished as soon as possible to allow the City to succeed at what the City now has decided is the strategy it would like to pursue to save both the canal and the neighborhoods. Obtaining this information is absolutely necessary if there would be hope to avoid rising political pressure in the years ahead to save the integrity of some large, established neighborhoods by asking the Corps to build the already-approved Westfield Wall with its flood gate across the canal.