

30 July 2018

South Tangipahoa Port Commission

RE: Increasing flood hazard at Port Manchac

Dear Commissioners,

We at GRN are distressed to hear the initiative to put Tangipahoa and Louisiana residents in the path of hurricane surge--"The Villages at Port Manchac" proposal. This proposal would place over 100 residences (currently proposed as slab-on-grade) into a velocity hazard zone, with a base flood elevation of 10ft in 2018, and above 14ft by 2067. This would likely place residences in South Tangipahoa into a voluntary buyout zone as soon as 2042, when sea level rise is predicted to rapidly increase.

We plead that the Commission delay any votes until CPRA evaluates¹ the updated costs to the State Master Plan (Project TAN.050) from this development.

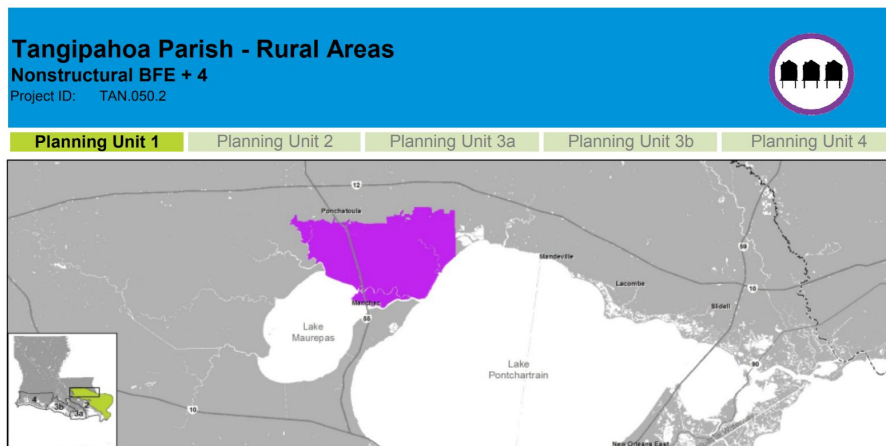


Figure 1. Map of TAN.050, [2012 State Master Plan](#) Appendix A-2 SE 204

¹ Under its authority over coastal permits 49 Section 214.3.1.B(2)(d)

(d) Review and modify proposed coastal use permits prior to issuance to the extent that such permits would authorize activities which significantly affect integrated coastal protection projects or which significantly diminish the benefits of projects intended to protect, conserve or enhance coastal areas and to require the issuance of permits for public or private integrated coastal protection projects or plans.

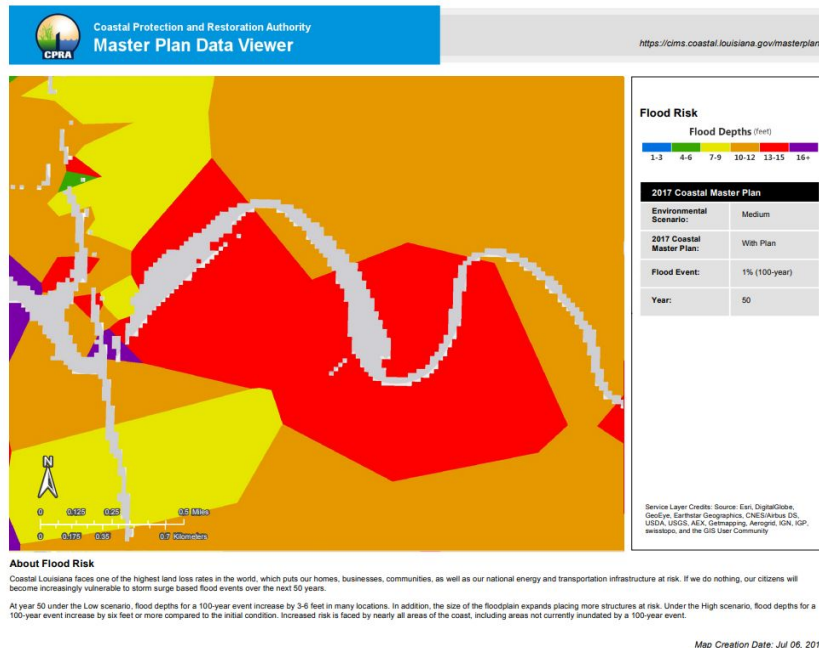


Figure 2. CPRA flood risk maps for the 100-year surge for 2067, showing a 13-15ft Base Flood Elevation for Port Manchac (red polygons). Note that the Port location is at higher risk for surge compared to most other areas in North Pass. This map was created by GRN using the CPRA flood risk information tool, online at <http://coastal.la.gov/flood-risk-resilience-viewer/>

The current residences in the Port Manchac are west of the railroad, likely because the railroad acts as an unengineered storm surge barrier. Isaac overtopped it, Hurricane Ike's surge pressed against it, but it is an informal "line of defense." As with a coastal levee, water piles up to the east of the railroad. North Pass acts as a natural funnel for storm surge. Metaphorically, the Port Property lies between the hammer of hurricane surge and the anvil of the railroad. This is not a safe place to encourage Louisiana residents to build California ranch homes.

It is unethical to mislead Louisiana residents that habitation in this area will be made safe with vague promises of "engineering", when the State's own engineering and planning has already enumerated the high cost to taxpayers of this kind of development.

We urge the Port Commission to delay any approvals or resolutions regarding "The Villages" until CPRA has updated the Non-Structural Program Plan for rural Tangipahoa Parish (TAN.050.2) with cost estimates. Appended is the 2012 evaluation of the cost to "floodproof" structures in the area. **In 2012, the cost to floodproof coastal Rural Tangipahoa was from \$72 to \$102.4 Million for 610 structures.** The costs of the project has no doubt increased in the 2017 plan--costs for St Tammany Parish increased from \$250 Million (2012) to \$1.6 Billion (2017).

Increasing the number of structures by 100-300 would significantly increase the cost of this plan to Louisiana taxpayers with little to no state or local benefit-especially if the design for the houses remains slab-on-grade. Unimproved lots, as proposed, would run around one hundred thousand. If built, structures will likely cost closer to one million than one hundred thousand. **At current available estimates, this project would likely double the cost of future floodproofing for South Tangipahoa.**

This extreme level of flood risk will remain for this area, whether or not the State can afford the construction of a surge gate on the Rigolets / Chef Pass.

Consult with Lake Pontchartrain Basin Foundation directly

Tourism activity is increasing in South Tangipahoa, thanks to decades of work by Lake Pontchartrain Basin Foundation (LPBF) and the State to clean the water of human waste. But adding so many new sources of human waste in these wetlands will require a major effort to maintain the area for swimming and fishing.

We urge the Commission to keep or to develop the wetlands here as a public ecotourism opportunity--economic development for the public interest, in line with the Port's mission, without residences. This would develop the area for maximal economic value to the State and local economy, while minimizing hazards to current and future Tangipahoa residents.

Most ecotourism areas in the area, such as Wetland Watchers' Park in St Charles, provide ample economic opportunity for local and regional residents without affecting more than 5 to 10 acres of wetlands. Destroying 100 acres of coastal marsh that could be restored to cypress forest is simply unacceptable. GRN will pursue any and all means within our power to protect and preserve these wetlands, which are critical storm surge protection for Tangipahoa and Parishes upstream. **In our interpretation of the 2011 LPBF policy recommendations, these wetlands must be conserved. But the Commission must meet with Lake Pontchartrain Basin Foundation directly to ascertain their position.**



Figure 14: Priority conservation areas in the report area, as delineated by the Lake Pontchartrain Basin Foundation and The Nature Conservancy, where development should not occur.

Figure 3. From the June 2011 LPBF Land Use Recommendations downloaded from saveourlake.org, "[Northshore Restoration](#)" Page 38 (Figure 14). North Pass is listed as a conservation area (green) as well as a natural "coastal line of defense."

We encourage the Commission to delay any decisions until the Commission has met with the experts at the Foundation themselves, specifically Drs Lopez and Henkel, who co-authored a series of recommendations in 2011 that the Villages seems to be misquoting.

GRN would encourage a genuine attempt at an ecotourism facility for the South Tangipahoa Port, but not this attempt to make money off the public's dime. We know that such facilities, such as Fontainebleu State Park, or Wetland Watchers Park, do not require the destruction of such large swaths of coastal marshes, marshes that themselves provide economic services to the tune of \$300,000 /year. Such ecotourism efforts do not take away public access to North Pass, but encourage maritime commerce and a resilient water economy.

We thank you for your time and efforts to develop the public economy on the waters of Louisiana.

For a healthy Gulf,

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Terry Jones

Figure 4. Terry Jones, "The Villages" presentation, showing canal development of slab-on-grade residences in 100 acres of coastal marshland on one mile of wetland streams. Screenshot from [online video](#).

Tangipahoa Parish - Rural Areas

Nonstructural BFE + 4

Project ID: TAN.050.2



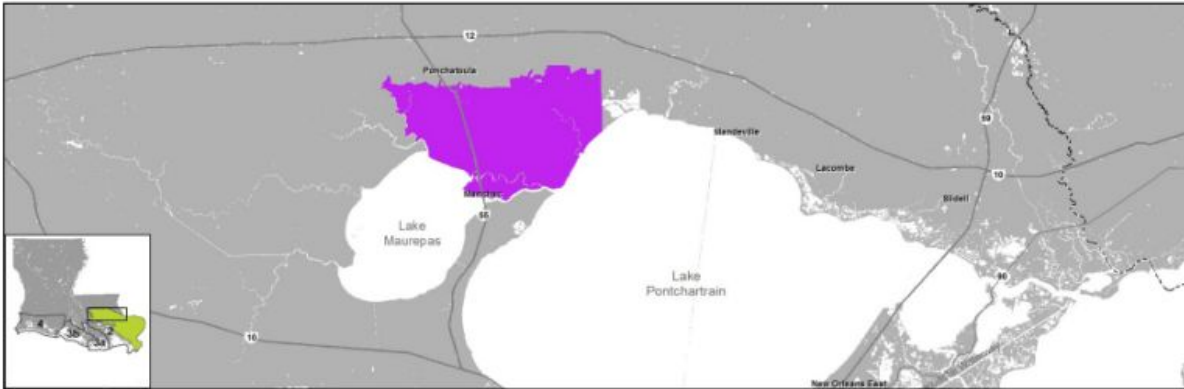
Planning Unit 1

Planning Unit 2

Planning Unit 3a

Planning Unit 3b

Planning Unit 4



Project Source

Developed for the 2012 Coastal Master Plan

Project Status

Conceptual Phase

Description

Combination of commercial and residential floodproofing to 3 feet and elevating residences to the Base Flood Elevation plus 4 feet within rural areas of Tangipahoa Parish.

Nonstructural projects in the master plan analysis provided a means of evaluating their contribution to the coast wide risk reduction goal. Nonstructural projects do not define specific houses and businesses to be protected. The development of the nonstructural program, in coordination with communities, will help define the actual design and implementation of these measures.

Scale of Influence



Estimated Damages Risk Reduction

FWOA = Future without Action
FWP = Future with Project

	Moderate		Less Optimistic	
	FWOA	FWP	FWOA	FWP
50 Year Event	\$771M	\$620M	\$925M	\$789M
100 Year Event	\$930M	\$801M	\$971M	\$877M
500 Year Event	\$990M	\$941M	\$1015M	\$964M

Project Cost Estimate

*Does not represent specific houses and businesses to be protected.

Nonstructural Measure	Estimated Number of Structures*	Cost
Floodproofed	10	\$ 2,852,000
Residential Elevated	600	\$ 99,556,000
Voluntary Residential Acquired	0	\$ -
Total	610	\$ 102,408,000

2012 Coastal Master Plan
Project Fact Sheet

SE-204

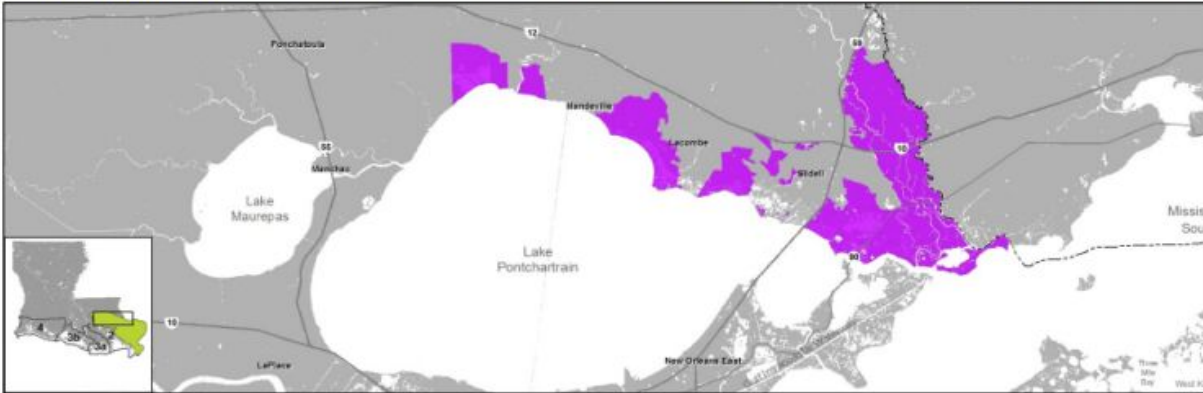
Saint Tammany Parish - Rural Areas

Nonstructural BFE + 4

Project ID: STT.050.2



Planning Unit 1 | Planning Unit 2 | Planning Unit 3a | Planning Unit 3b | Planning Unit 4



Project Source Developed for the 2012 Coastal Master Plan

Project Status Conceptual Phase

Description Combination of commercial and residential floodproofing to 3 feet, elevating residences to the Base Flood Elevation plus 4 feet, and voluntary acquisition of residential structures within rural areas of Saint Tammany Parish.

Nonstructural projects in the master plan analysis provided a means of evaluating their contribution to the coast wide risk reduction goal. Nonstructural projects do not define specific houses and businesses to be protected. The development of the nonstructural program, in coordination with communities, will help define the actual design and implementation of these measures.



Estimated Damages Risk Reduction	Moderate		Less Optimistic	
	FWOA	FWP	FWOA	FWP
50 Year Event	\$1849M	\$1561M	\$2221M	\$1749M
100 Year Event	\$2518M	\$1999M	\$3478M	\$2861M
500 Year Event	\$4411M	\$3758M	\$4806M	\$4198M

FWOA = Future without Action
FWP = Future with Project

Project Cost Estimate	Nonstructural Measure	Estimated Number of Structures*		Cost
		Count	Value	
<i>*Does not represent specific houses and businesses to be protected.</i>	Floodproofed	50	\$	34,856,000
	Residential Elevated	1110	\$	198,458,000
	Voluntary Residential Acquired	50	\$	17,589,000
	Total	1210	\$	250,903,000

2012 Coastal Master Plan
Project Fact Sheet

SE-200

