



Coastal Protection and Restoration Authority  
150 Terrace Avenue, Baton Rouge, LA 70802 | [coastal@la.gov](mailto:coastal@la.gov) | [www.coastal.la.gov](http://www.coastal.la.gov)

## 2017 Coastal Master Plan

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# Attachment G2-C: Public Comments



Report: Final

Date: April 2017

Prepared By: Nick Speyrer and Avery Woodard (Emergent Method)

Dear CPRA,

I am concerned for Louisiana's coastal communities. The homes of many families are at risk of getting washed away due to extreme weather conditions such as rising seas, flooding, and storm surges.

These weather patterns will devastate many families — they will be without a home.

The state offered potential solutions that include flood proofing, home elevation, and voluntary relocation programs, however ~~not~~ sufficient funding hasn't been offered to implement these solutions. Priority should be given to low-income and high-risk flood communities.

We are the only hope for the coastal

Communities

Respectfully,  
Crysten Price  
Aupt Price

Dear CPRA:

LA Coastal Communities are at risk of getting washed away from rising seas, flooding, and storm surge. We are glad to see that Draft Louisiana Coastal Master plan prioritizes wetland restoration efforts that will make our communities safer and protect our economy in the long run, but we are past the point where levees and coastal restoration alone are enough to protect communities. The state has laid out potential solutions in the Coastal Master Plan but has not offered enough funding to implement these solutions. Gov. Edwards must lead the way in providing communities with the resources needed to ensure that they have a future. For every dollar spent on structural projects and mitigation measures, 20 cents should be allocated to non-structural protections. Low income and high risk flood communities should be given priority for funding. Using a cost benefit model leaves our most at risk communities out. It is past time for the state of LA to stand up for our coastal communities that are most at risk.

Sincerely,  
Kathleen Lindsey  
100 LaSalle Ct  
New Orleans, LA 70118  
713-305-7272  
KathleenLO529@gmail.com

The Coastal Protection and Restoration Authority  
P.O. Box 44027  
Baton Rouge, LA 70804

Dear CPRA,

Many Louisiana coastal communities are at risk of severe flooding and getting washed away from storms and rising sea levels. These communities must be protected by our government through more funding allotted to them for resources, including floodproofing, home elevation, and voluntary relocation programs. The Draft Louisiana Coastal Master Plan helps protect our wetlands in the long term, but currently many communities and families are being forced to repair or move from their homes due to rising sea levels and flooding. These smaller communities are a greatly important part of the wider community of Louisiana and must be protected in spite of their size. Gov. Edwards must lead in ensuring this by providing 20 cents for every dollar spent on structural projects to non structural protection for these communities, especially the ones coming from low incomes

and high risk flood communities.  
Louisiana and our government  
must stand up for these  
communities' protection.

Sincerely,

Emily Ortiz

100 LaSalle

New Orleans, LA 70118

251-622-7426

ecortiz@loyno.edu

C.C: Governor John Bel Edwards,  
State legislators, Parish officials

Dear CPRA:

LA Coastal Communities are at RISK of getting washed away from rising seas, flooding, and storm surge. We are glad to see that Draft Louisiana Coastal Master plan prioritizes wetland restoration efforts that will make our communities safer & protect our economy in the long run, but we're past the point where levees & coastal restoration alone are enough to protect communities. The state has laid out potential solutions in the Coastal Master Plan like floodproofing, home elevation, and voluntary relocation programs that can protect our communities quickly, but has not offered enough funding to implement these ~~solutions~~ solutions. Gov. Edwards must lead the way in providing communities with the resources needed to ensure that they have a future. For every dollar spent on structural projects & mitigation measures, 20 cents should be allocated to non structural protections. Low income & high risk flood communities should be given priority for funding. Using a cost benefit model leaves our most at risk communities out. ~~It's~~

past time for the state of LA  
to stand up for our Coastal  
communities that are most  
at risk.

Sincerely,  
Samantha Griffin

Dear CPRA:

The state has laid out potential solutions in the Coastal Master Plan like floodproofing, home, home elevation and voluntary relocation programs that can protect our communities quickly, but has not offered enough funding to implement these solutions. Although I have no way financially support this it is an issue that I fully support for the future of ~~our~~ not only our state, but our country

Sincerely,

Nancyda Awta

Jeffrey D Gardner  
4528 S Prieur St  
New Orleans LA 70125

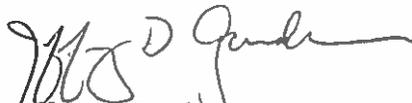
February 16, 2017

The Coastal Protection and Restoration Authority  
PO Box 44027  
Baton Rouge LA 70804

Dear CPRA,

- LA Coastal Communities are at risk of getting wasted away from the rising seas, flooding and storm surge. We are glad to see that Draft Louisiana Coastal Master Plan prioritizes wetland restoration efforts that will make our communities safer and protect our economy in the long run, but we are past the point where levees and coastal restoration alone are enough to protect communities.
- The state laid out potential solutions in the Coastal Master Plan like floodproofing, home elevation and voluntary relocation programs that can protect our communities quickly, but has not offered enough funding to implement these solutions.
- Gov. Edwards must lead the way in providing communities with resources needed to ensure that they have a future. For every dollar spent on structural projects and mitigation measures 20 cents should be allocated to non-structural protections such as floodproofing and home elevations.
- Low income and high risk communities should be given priority for funding. Using a cost benefit model leaves our most at risk communities out. It's past time for the state of Louisiana to stand up for our coastal communities that are most at risk.

Sincerely,



Jeffrey D Gardner

Cc: Gov. John Bel Edwards, state legislators, parish officials

Dear CPRA,

I am concerned w/ the lack of funding for our vulnerable communities, regarding floodproofing, home elevation and relocation programs. Our communities & culture need this protection. Please consider more funding for these efforts in the Coastal Master Plan.

Respectfully,



Dear CPRA,

I am writing to you today to voice my concern about LA Coastal Communities and their risk of getting washed away by rising sea levels, flooding and storm surge. I appreciate and acknowledge every thing DRAFT Louisiana Coastal Master plan has set in place for the restoration of the wetlands but were past the point of levees & Coastal Restoration being enough to protect communities; WE NEED TO DO MORE!

Sincerely,

Jeremiah Edness

• 4219 Vincennes Pl.  
New Orleans, LA 70125  
(610) 766-0156  
Jeremiah.Edness@gmail.com

Dear CPRA:

Low income & high risk<sup>flood</sup> communities should be given priority for funding. Using a cost benefit model leaves our most at risk communities out. It's past time for the state of LA to stand up for our coastal communities that are most at risk.

Sincerely,



Charles McLaughlin  
2816 General Pershing St.  
New Orleans, LA  
70115

CWMcLaughlin814@gmail.com

Dear CPRA,

I am writing to you today as a current Louisiana resident who is concerned with the extreme environmental degradation taking place in our state. It is old news that we are losing a football field of wetlands every 48 minutes. These wetlands protect our state from the dangers of rising sea levels, flooding, and storm surge and we NEED them.

We are in a CRITICAL SITUATION. Climate change is spiraling out of control and no one knows when the next major storm will hit. The potential solutions in the Coastal Master Plan can help, but not without adequate funding.

Low income and high risk flood communities are at the biggest disadvantage to the impacts of climate change. These people should be given priority and not put on the back burner so to speak. There are coastal communities ALREADY being displaced here in Louisiana, as well as around the world, and it is only getting started. I urge you, on the behalf of all of us in Louisiana, to do what is ultimately the right thing to do and help these communities most at risk.

Sincerely,

David D'Angelo

2524 Jean St,  
New Orleans, LA 70115  
Daviddangelo1994@gmail.com

The Coastal Protection and Restoration Authority  
P.O. Box 44027  
Baton Rouge, LA 70804

Dear CPRA:

I am Shannon Hester, a student in New Orleans, and a very concerned citizen. LA coastal communities are at risk of getting washed away from rising seas, flooding and storm surge. We are glad to see that Draft Louisiana Coastal Master Plan prioritizes wetland restoration efforts that will make our communities safer and protect our economy in the long run, but we're past the point where levees and coastal restoration alone are enough to protect communities. The state has laid out potential solutions in the Coastal Master Plan like flood proofing, home elevation, and voluntary relocation programs that can protect our communities quickly, but has not offered enough funding to implement these solutions. Gov. Edwards must lead the way in providing communities with the resources needed to ensure that they have a future. Low income and high risk communities should be given priority for funding, for they are usually left out in a cost benefit model. It's past time for the state of LA to stand up for our coastal communities that are most at risk.

Sincerely,

Shannon Hester

133 Humphrey Ave. Bayoune, NJ 07002

100 LaSalle Ct. New Orleans, LA 70118

(201)-978-2573

shannon3hester@gmail.com

Dear Coastal Protection and  
Restoration Authority,

Louisiana is an incredible state filled with incredible people that have created a wonderful and unique culture. Coastal communities provide us with the resources to continue practicing our culinary culture. They are at high risk due to the coastal erosion. Rising seas, flooding or a storm surge could wipe them out.

It is excellent to see that the Draft Louisiana Coastal Master plan prioritizes wetland restoration. It does seem as though we are past the point where levees and coastal restoration alone offer enough protection. Floodproofing, home elevation and voluntary relocation programs were delineated in the Coastal Master Plan, but the funding for them was not offered.

Gov. Edwards must lead the way in providing the resources to ensure a future for Louisiana residents.

Sincerely  
Abby Perkins

Dear CPRA,

During my time here in New Orleans I have had the opportunity to meet many native Louisianians and hear about their experiences in this state. Having come to this state after Katrina, I have put some effort into hearing stories about how hurricanes and other natural disasters affect communities. Working in conjunction with various groups I have also been introduced to the concept of ~~loss~~ landloss in Southern Louisiana due to the rising levels of the Gulf of Mexico. In no way would I be considered an expert on the situation but I can say that I have listened to and spoken with many experts who have tirelessly worked to inform the nation of Louisiana's ~~ecology~~ environmental disaster. Recently I have come <sup>across</sup> ~~across~~ the idea of non-structural protections and how it is beneficial to ~~something~~ give them more importance. Allocating 20 cents to non-structural protections for every dollar spent on structural ~~and~~ projects and mitigation measures can assist in providing communities with a variety of resources to ensure their well-beings. ~~From one transpl~~

From one transplant who's love of Louisiana's ~~land~~ environmental wealth knows no end, thank you.

Nickolas Moore

817 Adams St LA 70114

510-499-0511 nickolasmooore@gmail.com

Dear CPRA,

While your work prioritizing wetland restoration efforts in the Draft Louisiana Coastal Master Plan is admirable and appreciated, particularly as far as protecting our communities and economy in the long run, LA coastal communities are still at risk of getting washed away from rising seas, flooding, and storm surge. Though solutions such as floodproofing, home elevation, and voluntary relocation programs have been laid out, the fact remains that these projects are largely without proper funding.

For every dollar spent on structural projects and mitigation, 20 cents should be ~~allocated~~ allocated to the sorts of non structural protections mentioned above. It is the responsibility of Gov. Edwards to lead the way in ensuring these coastal communities are safe and provided the future option to ~~remain~~ remain where they live today.

Low income and high risk communities in particular, and consequentially those most likely to experience the full effects of rising sea levels, flooding, and storm surges, should be given priority for funding: using a cost benefit model leaves our most at-risk communities out. These are protections owed, ~~not~~ deserved, and greatly needed.

Sincerely,

  
Madelyn Fox

817 Adams St

New Orleans, LA, 70118 Page | 1225  
~~maddygreerfox@gmail.com~~ maddygreerfox@gmail.com

Dear CPRA,

It has been brought to my attention that the LA Coastal Communities are at risk of being washed away by rising sea levels, flooding, and storm surge. I understand that you are doing your best to restore wetlands that will make our communities safer, however we are past the point where levees and coastal restoration will be able to protect coastal communities.

~~However~~ The state has come up with the Coastal Master Plan which consists of potential solutions such as flood proofing, home elevation, and voluntary relocation programs. However, they have not offered any funding to implement these solutions.

Governor Edwards must prioritize providing communities with the resources <sup>needed</sup> to ensure that they have a future. For every dollar spent on structural projects and mitigation measures, 20 cents should go towards non structural protections

Low income and high risk flood communities should be given priority for funding.

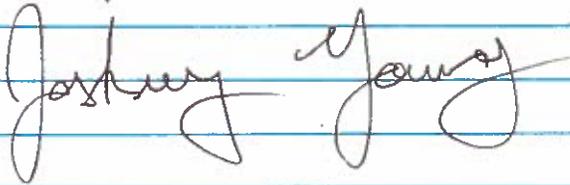
Sincerely,  
Sara O'Doherty  
5416 Story Street  
New Orleans, LA 70115  
saodohert@my.louisiana.edu

The Coastal Protection and Restoration Authority  
P.O. Box 44027  
Baton Rouge, LA 70804

Dear CPRA:

LA Coastal Communities are at risk of getting washed away from rising seas, flooding and storm surge. We are glad to see that Draft Louisiana Coastal Master plan prioritizes wetland restoration efforts that will make our communities safer and protect our economy in the long run, but we are past the point where levees and coastal restoration alone are enough to protect communities. The state has laid out potential plans, but has not given enough funding to enact these plans. We propose that 20 cents for every dollar spent can be saved, allocated towards non structural protections such as floodproofing and home elevation. Low income and high risk flooding communities should be given priority for funding.

Sincerely,



Marissa DeQueant

Dear CPRA,

I have lived in South Louisiana my entire life. Because of rising sea levels and flooding, LA coastal communities are at high risk of getting washed away. I realize that the Draft Louisiana Coastal Master Plan prioritizes wetland restoration, but it seems like we are ~~the~~ past the point where levees and coastal restoration alone are enough to protect the Louisiana Coastal communities.

Floodproofing, home elevation, and relocation programs have been laid out as potential solutions in the Coastal Master Plan. The problem is that there has not been enough funding to begin implementing these solutions. Governor Edwards has to take ~~the~~ the lead in providing Louisiana Coastal Communities with resources ensuring their future here. For every dollar spent on structural projects and mitigation, 20 cents could be allocated to non-structural protections like floodproofing and home elevation. High risk flood communities and low income communities should be given priority for funding. A cost benefit ~~analysis~~ model leaves most of the ~~case~~ high risk communities out. ~~the~~

Please take this into consideration.

Dear CPRA,

Louisiana's coastal communities are in danger of being washed over by rising seas, flooding and storm surge. We are glad to see the Draft Louisiana Coastal Master plan make Wetland restoration a top priority. However we are past the point where levees and Coastal restoration alone are enough to protect communities. Governor Edwards must lead the way in providing communities the resources they need to make sure they exist in the future. 20 cents of every dollar spent should be put towards non-structural protections like flood proofing and home elevation. In addition to that, low income and high risk communities should be given priority funding.

Sincerely, Sherif

779 Montgomery

Jersey City

New Jersey

07306

917-494-4802

Selmetwa@gmail.com

Dear CPRA:

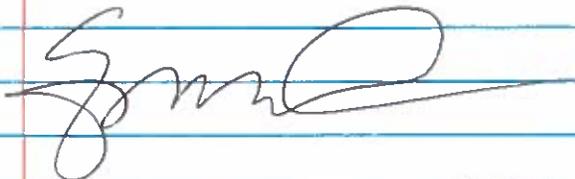
The Louisiana Coastal Communities are at a very upsetting risk of being washed away from the rising seas and more violent storms. We are far past the point where levees and coastal restoration alone can help and protect the communities and land.

Low income and high risk flood communities should be given priority. Please. We all share this earth and need to protect each other in the world.

For every dollar spent on structural and mitigation measures, 20 cents should be allocated to non structural protections.

Sincerely,

Emma Arnold  
100 LaSalle Court  
New Orleans, LA 70118



The Coastal Protection and Restoration Authority  
P.O. Box 44027  
Baton Rouge, LA 70804

2017 Coastal Master Plan: Public Comments

Dear CPRA,

Rising seas, flooding, and storm surge are affecting LA coastal communities. These communities are at risk, and need the help and support to avoid getting washed away. To protect these communities, we need to move past levees and coastal restoration. Draft Louisiana Coastal Master plan focuses on wetland restoration efforts that will make our communities safer and protect our economy. Through the Coastal Master Plan, the state produced some solutions that will result in quick fixes. However, there is not enough funding offered to put the changes in effect. We need Governor Edwards to lead the way in ensuring a future for these communities. For every dollar spent on structural changes, 20 cents should be put to non-structural changes. Therefore, the communities that have the highest flood risk and are low income deserve the funding. It is time for <sup>the state of</sup> Louisiana to help protect these communities from devastation and destruction.

Sincerely,

Kaitlyn Cleveland

17204 St. Gertrude Dr.  
Covington, LA 70435  
(985) 893-9589  
kaitlyn.cleveland@charter.net

Area CPRA;

It has been brought to my attention Louisiana coastal communities are highlighted risk of being wiped out by natural occurrences in the environment. I'm glad to see the Draft Louisiana Coastal Master plan priority's wetland restoration efforts that will protect and insure the future of our communities. We are past the point that levees and coastal restoration alone are not enough to help us.

The Coastal Master Plan involves potential solutions for the naturally occurring inconveniences such as flood proofing, home elevation and voluntary relocation. It is up to Gov. Edwards to lead this ecological revolution in order to insure the future of our community. For every ~~one~~ dollar ~~is~~ spent on structural projects and mitigation measures, 20 cents should be allocated to non-structural protections such as flood proofing and home elevation. It is the less fortunate who should be given priority when it comes to funding. It's time for Louisiana's government to stand up for our coastal communities, which are most at risk.

Sincerely, Enriquez  
 Albert Henriquez  
 8517 SW 8th Avenue  
 33143, Miami FL

The Coastal Protection and Restoration Authority  
P.O. Box 44027  
Baton Rouge, LA 70804

Dear CPRA: I am concerned about the safety of marginalized communities and people of color over the next few decades due to climate change. The state of Louisiana is losing huge amounts of water every day. Poorer communities in Louisiana don't have the infrastructure in order to protect them if a disaster came. The coastal communities of Louisiana are the areas most at risk. Please protect them by giving priority funding to coastal community development and infrastructure. You'll be doing an amazing service to so many people.

Sincerely,  
Maurice Huff  
100 LaSalle Court Buddig Hall  
New Orleans, LA 70118

Dear CIRA,

Many communities in coastal Louisiana are vanishing with every storm that comes through. The Draft Louisiana Coastal Master Plan was great, but now we are past that point. Elevating levees and homes will not be enough. Governor Edwards could lead the way to a new path for us. If for every dollar spent 20¢ is given to nonstructural protections we could start to save Louisiana. It is hard to see the levees being built up behind my house in Kenner over and over again. I feel like we are still not fixing the main problem.

Sincerely, Lori ~~Sutherland~~

68 Verde St.

Kenner, La 70065

504-794-5303

l6tsuth@gmail.com

Sarkely Morales

Dear CPRA:

Right now there are people in our coast that are being affected by the current state our world is in. Many of these communities are at danger of losing their homes; by being washed away from rising seas, flooding and storm surge. The state has laid out potential solutions in the Coastal Master Plan like floodproofing, home elevation and voluntary relocation programs that can protect our communities quickly, but has not offered enough funding to implement these solutions. It is important and the last resort for these communities to be protected by their state.

Sincerely,

Sarkely Morales

Dear CPRA:

Social justice issues matter for the future of the people who live in the water lands of Louisiana. We need to protect our people and communities, money needs to be allocated for the people of human life. These people would leave their homes.

Rising seas, flooding, and storm surge is a very serious problem for LA coastal communities. In order to implement the solutions laid out, we need to have the funds.

Gov. Edwards, this lays in your hands! Lead the way in helping these communities. Low income, high risk should be helped FIRST! The state of LA needs to take a stand and help its citizens!!

Sincerely, *Athena*

Athena Kennedy

2229 Milan St.

New Orleans, LA 70115

(703) 638-9871

athena.kennedy@yahoo.com

Dear CPRA:

Coastal communities in Louisiana are at high risk of getting washed away due to climate issues like rising sea levels, flooding, and storm surge. Low income communities are often the most high-risk flood communities, therefore these communities should be allocated the most funding. The current draft of the Louisiana Coastal Master Plan leaves these high-risk communities out, because the Plan uses a cost benefit model. This draft of the Master Plan also is lacking in non-structural protection solutions like flood-proofing and home elevation. I suggest that for every dollar spent on structural projects, 20 cents should be allocated to non-structural projects like flood proofing and home elevation.

Sincerely,

Annie Skivington  
200 LaSalle Court  
New Orleans, LA 70118

Dear CPRA,

Restoring wetlands in Louisiana is extremely important ~~project~~ if we want communities to be preserved. Providing funding to restore wetlands will save communities and allow those communities that are currently at risk of being ruined due to flooding to be saved. This isn't just our issue, it is the next generation's issue as well. Please provide this funding, so that it will not be as big of an issue in the long run.

Victoria

Dear CPRA,

I believe that making sure no more of Louisiana's land gets eroded away into the Gulf should be a priority. I've lived in Baton Rouge my entire life, so therefore the flooding of our coast never directly affected me. However, after the devastating floods in Baton Rouge in the fall of 2016, I have seen first hand the struggle of losing your home to water.

If there is no more Louisiana left, than who are you governing?

*Danielle Bell*

Dear CPRA,

As you know, LA Coastal communities are at risk from rising seas, flooding + storm surge. As a resident of Louisiana, I appreciate the Draft Louisiana Coastal Master Plan + it's efforts to restore wetlands to protect communities + our economy, however, levees + coastal restoration alone is not enough anymore.

I am aware that Louisiana has provided potential solutions like floodproofing, home elevation, + voluntary relocation programs to efficiently protect communities, but is left without funding to implement these ~~more~~ necessary actions.

= It is imperative that Governor Edwards leads the way in providing communities with resources necessary for their future. This is why for every dollar spent on structural projects + mitigation measures, 20 cents should be allocated to non structural protections such as floodproofing + home elevations.

The state of Louisiana must take responsibility + protect low income, high risk communities. Cost benefit models do not do this and therefore are ineffective in ensuring the safety and well being of these Americans. Taking this step must be taken now, as it is long overdue.

Thank You For Your Time,

Hayley Fisse

Dear CPRA:

Louisiana's coast is getting washed away as we speak. We cannot count on levees and coastal restoration because they are not enough to protect these communities. Of course, we appreciate Draft Louisiana Coastal Master's hard work, but we need more than just their plan. There are solutions provided like floodproofing, home elevation, and voluntary relocation programs, but we cannot execute these plans without enough funding. Governor Edwards is a huge source in helping us solve this problem. The state of Louisiana is counting on you now more than ever.

Sincerely,  
Summi Rae Blanchard

Dear CPRA:

LA coastal communities are at risk of getting washed away from rising seas, flooding & storm surge. We are glad to see that Draft Louisiana Coastal Master Plan prioritizes wetland restoration efforts that will make our communities safer and protect our economy in the long run, but we're past the point where levees and coastal restoration alone are enough to protect communities.

Low income and high risk flood communities should be given priority for funding. Using a cost benefit model leaves our most at risk communities out. It is past time for the state of LA to stand up for our coastal communities that are most at risk!

Sincerely,

Conlan Rome

6109 Marinal Foch St.

New Orleans, LA 70124

504-444-3777

conlanrome@gmail.com

THE COASTAL PROTECTION AND RESTORATION AUTHORITY  
P.O. BOX ~~9440~~ 44027  
BATON ROUGE, LA 70804

DEAR CPRA,

I SEE YOUR EFFORTS TO PRIORITIZE WET LAND RESTORATION. BUT AS A MEMBER OF THE COASTAL COMMUNITY LEVEES AND RESTORATION ~~IS~~ IS NOT ENOUGH. WE ARE IN RISK OF LOSING SUCH IMPORTANT CULTURAL POCKETS OF THE SOUTH. WHILE SOLUTIONS HAVE BEEN LAID OUT, HOW TO IMPLEMENT SAID SOLUTIONS, SEEMINGLY HAVE BEEN FORGOTTEN. WE NEED A LEADER THAT WILL GIVE US WAYS TO IMPLEMENT THESE SOLUTIONS IN HOPES WE CAN STILL HAVE A FUTURE. THE TIME IS NOW! LOW INCOME AND HIGH FLOOD RISK AREAS MUST TAKE PRIORITY. FOR THE BASIC COST BENEFIT LEAVES THEM OUT.

THANK YOU FOR YOUR EFFORTS. NOW LETS PERFECT THEM SO WE ARE ALL PROTECTED.

SINCERELY,

  
KELSEY BREHM

Dear CPRA,

As a Sophomore at Loyola University, I find myself feeling distant from wetlands and swamps. Living in the Westbank, I found out fast how close I lived to them. By the time I turn to a grandfather, I might see a very different Louisiana, and might not be seeing home the way I remember.

While the Draft Louisiana Coastal Master plan can make our communities safer and protect both us and our economies, just restoring the coast and levees is far from the end of what we should be able to accomplish to save Louisiana. We can have more funding, more resources, and more measures to create both a better and more efficient protection system. More money needs to be spent on flood protection and home elevation, because one or two lines of defense doesn't cut it for hurricanes.

It's low income and high risk flood communities that need the funding the most. Taking the most utilitarian of approach doesn't always save part of our culture and our way of life as Louisianans.

Mason Chang



33 Magnolia Trace Dr.

Harvey, Louisiana 70058

(281) 857-0850

[mwchang@my.loyno.edu](mailto:mwchang@my.loyno.edu)

Governor John Bel Edwards

Good afternoon,

Please review the attached comments from St. John the Baptist Parish.

Thanks,  
Megan Collins

*Megan Collins*  
Executive Assistant to the Parish President  
St. John the Baptist Parish  
[m.collins@stjohn-la.gov](mailto:m.collins@stjohn-la.gov)  
985.652.9569



St. John the Baptist Parish  
Office of the Parish President

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**MEMORANDUM**

Date: March 20, 2017

To: Bren Haase, Chief of Planning and Research – CPRA

Cc: Chip Kline, Deputy Director – CPRA  
Alexandra Carter, Director of Planning and Zoning – St. John the Baptist Parish  
Evelyn Campo, Coastal Zone Administrator – St. John the Baptist Parish

From: Natalie Robottom, Parish President – St. John the Baptist Parish *NR*

Re: CPRA Draft Master Plan Comments

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St. John the Baptist Parish supports adoption of the 2017 update to Louisiana’s Comprehensive Master Plan for a Sustainable Coast. Further, the Parish Administration would like to emphasize the urgent need for the funding and construction of the federally authorized West Shore Lake Pontchartrain Levee Project. This project will provide critical flood and surge protection to over 13,000 homes and businesses and has been estimated to have an average annual benefit of over \$97 million. This project would also protect portions of the Interstate system (I-10 & I-55) subject to storm surge and flooding that are integral to regional evacuations and access to local industry.

St. John the Baptist Parish supports the addition of nonstructural mitigation projects to the Master Plan and respectfully requests that this project area be expanded to more structures and to include property in the LaPlace, Reserve and Garyville regions. Over 10,000 residents currently live within the Special Flood Hazard Area (SFHA) or the 100-year floodplain in the Parish, and the provision of nonstructural mitigation to these areas is critical to its long-term sustainability.

St. John the Baptist Parish also requests inclusion of a shoreline protection project along the southwestern shore of Lake Pontchartrain. The stabilization of this shoreline, which is experiencing a land loss rate of ten feet per year, would offer such benefits as a reduction in storm surge for 30,000 LaPlace residents, protection of the potable water system (which was shut down due to storm surge from Hurricane Isaac), and reduction in storm surge for evacuation routes serving the southeast Louisiana region.

Finally, St. John the Baptist Parish recognizes the regional function that the Maurepas wetlands serve, and we support the proposed East Maurepas Diversion project. St. John the Baptist Parish requests the inclusion of a project focused on marsh creation in the vicinity of Lake Maurepas in future iterations of the Master Plan. A focus on this type of project is critical to reducing flood and storm surge risks for residents of Reserve and Garyville and would provide storm protection to evacuation routes.

## Zachary Rosen

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**From:** Nick Speyrer <nick@emergentmethod.com>  
**Sent:** Saturday, March 25, 2017 9:14 AM  
**To:** Nick Speyrer  
**Cc:** Darryl Clark; Bren Haase  
**Subject:** FW: FWS Comments to the Draft 2017 State Master Plan  
**Attachments:** 20170324\_Final\_FWS\_2017\_State\_Master\_Plan\_Comment\_Letter.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

All:

See the below email from Darryl Clark. He asked that I share FWS' comments on the 2017 Coastal Master Plan with the FDT. Hope you are well – have a great weekend!

Nick

**From:** Clark, Darryl [mailto:darryl\_clark@fws.gov]  
**Sent:** Friday, March 24, 2017 3:51 PM  
**To:** Bren Haase <bren.haase@la.gov>  
**Cc:** Michael Ellis <michael.ellis@la.gov>; Jeff Weller <Jeff\_Weller@fws.gov>; Ronald Paille <Ronald\_Paille@fws.gov>; Nick Speyrer <nick@emergentmethod.com>  
**Subject:** FWS Comments to the Draft 2017 State Master Plan

Bren,

Attached is the FWS draft 2017 State Master Plan comment letter. The original will be mailed to Johnny Bradberry.

We appreciate you, Nick Speyrer, and the CPRA plan development team for leading the 2017 State Master Plan effort.

The Plan will benefit coastal Louisiana by providing storm protection and restore and protect coastal habitats for fish and wildlife resources. The Service commends the state for its inclusion of state, local, and federal agencies, non-governmental agencies, and coastal stakeholders in the Plan's development stages on the Framework Development Team and focus groups.

Darryl

--

Darryl Clark  
U. S. Fish and Wildlife Service  
CWPPRA Coordinator  
LA Ecological Services Office  
646 Cajundome Blvd., Suite 400

Lafayette, LA 70506  
337-291-3111 (phone)  
337-291-3139 (fax)  
[Darryl\\_Clark@fws.gov](mailto:Darryl_Clark@fws.gov)  
[Website](#)  
[LAES Office Facebook](#)

***NOTE: This email correspondence and any attachments to and from this sender is subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.***



## United States Department of the Interior

FISH AND WILDLIFE SERVICE

646 Cajundome Blvd.

Suite 400

Lafayette, Louisiana 70506

March 24, 2017



Mr. Johnny B. Bradberry  
 Executive Assistant to the Governor  
 For Coastal Activities  
 Chairman  
 Louisiana Coastal Protection and Restoration Authority  
 P. O. Box 94004  
 Baton Rouge, Louisiana 70804

Dear Mr. Bradberry:

The Fish and Wildlife Service (Service) appreciates the opportunity to review the draft 2017 “Louisiana’s Comprehensive Master Plan for a Sustainable Coast” (Plan) released on January 3, 2017. The Plan consists of 120 protection and restoration projects that address the large and complex issues of coastal land loss, restoration, management and protection within Louisiana’s coastal zone. The Service reviewed the Plan and provides the following comments, jointly developed between the Louisiana Ecological Services Office and the Southwest and Southeast National Wildlife Refuges Complexes, in accordance with provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.), the National Environmental Policy Act (83 Stat. 852, as amended; 42 U.S.C. 4321-4347), the Migratory Bird Treaty Act (MBTA) (40 Stat. 755, as amended; 16 U.S.C. 703 et seq.), the Coastal Barrier Resources Act of 1982 (96 Stat. 1653, as amended; 16 U.S.C. 3501 et seq.), and the National Wildlife Refuge Improvement Act (111 Stat. 1252, as amended; 16 U.S.C. 668 et seq.).

### General Comments

If implemented the Plan will benefit coastal Louisiana by providing storm protection for its residents, while restoring and protecting coastal habitats for fish and wildlife resources. The Service commends the state for its inclusion of state, local, and federal agencies, non-governmental agencies, and coastal stakeholders in the Plan’s development stages on the Framework Development Team, focus groups, Science and Engineering Board, and Technical Advisory Committees.

We commend the State for including bold actions to restore wetlands in the Barataria and Breton Sound basins via Mississippi River sediment diversions. The Service supports sediment diversions as a cost effective sustainable way to maintain and restore marshes that have converted to open water due to sea level rise, subsidence, saltwater intrusion and the lack of river sediment.

The Plan includes large marsh restoration projects using dredged material from the Mississippi River, coastal bays, and the Gulf of Mexico. The Service supports the inclusion of marsh restoration east and west of Calcasieu Lake, the southcentral Terrebonne basin, the Highway 1

corridor, the Barataria and Breton Sound Basin Landbridges, the Orleans Landbridge, and north shore of Lake Pontchartrain.

Some areas of the coast seem to lack restoration features. Those areas include the western Barataria Basin and some portions of the eastern Terrebonne Basin. We recommend that the revised Plan include marsh creation projects in those areas.

#### Threatened and Endangered Species

Enclosed is the current list, by parish, of threatened and endangered species and their critical habitats in coastal Louisiana to assist you in assessing potential project effects. As you assess project effects to listed species, please consider direct and indirect effects of all aspects of the project. The Service is willing to meet with CPRA to explore proactive ways to address federally protected species concerns. We encourage State project managers to contact our office early in project design (our Endangered Species Coordinator is Monica Sikes, [Monica\\_Sikes@fws.gov](mailto:Monica_Sikes@fws.gov), 337-291-3118) in order to address any potential impacts to listed species in a timely manner.

#### Wetland Regulatory, Migratory Birds, Coastal Barrier Resources Act, and National Wildlife Refuges

The Service requests that State project managers coordinate with the Louisiana Ecological Services Office early for projects with migratory bird and wetland regulatory issues. Our Migratory Bird Contact is Angela Trahan ([Angela\\_Trahan@fws.gov](mailto:Angela_Trahan@fws.gov), 337-291-3137). Our regulatory program contact is David Soileau ([David\\_Soileau@fws.gov](mailto:David_Soileau@fws.gov), 337-291-3109). Coordination under the Coastal Barrier Resources Act may be necessary for some projects, and our contact is Amy Trahan ([Amy\\_Trahan@fws.gov](mailto:Amy_Trahan@fws.gov), 337-291-3126). Coordination may be needed with specific national wildlife refuges for Special Use Permits and determinations of compatible use for work on Louisiana national wildlife refuges, please contact Neil Lalonde ([Neil\\_Lalonde@fws.gov](mailto:Neil_Lalonde@fws.gov), 985-882-2000), supervisor - Southeast LA National Wildlife Refuges Complex, and/or Christian Eggleston ([Christian\\_Eggleston@fws.gov](mailto:Christian_Eggleston@fws.gov), 337-598-2216), supervisor - Southwest LA National Wildlife Refuges Complex. The Service is willing to cooperate fully with the implementation of restoration projects on refuges.

#### Specific Comments

##### Southwest Coast

Page 106, Figure 4.14 Southwest Coast Map, Gulf Shoreline Protection from Lower Mud Lake to Rollover Bayou (2012 Plan, 004.SP.05a) – The Service recommends the State include Gulf shoreline stabilization along the southwestern LA coast, especially in areas of greatest erosion. This section of the Chenier Plain Gulf shoreline, especially near Rockefeller State Wildlife and Game Preserve, is currently experiencing some of the highest erosion rates along the Louisiana Gulf coast (> 40 feet/year). With warm winters, the frequency of southerly winds is greater, and the corresponding shoreline erosion rates are greater. If such conditions become common in the future, this measure may provide more benefits than previously determined. In some critical

places, continued erosion may breach into interior waterbodies causing hydrologic disruptions such as increased tidal exchange and saltwater intrusion. This feature could be reduced to protect some of the smaller more critical reaches.

Page 106, Calcasieu Ship Channel Gulf Salinity Control Structures (004.HR.06) – The Service supports the concept of structures to help mitigate saltwater intrusion into Calcasieu Lake and surrounding marshes caused by the construction of the Calcasieu Ship Channel. The Service recommends that this hydrologic restoration project be designed to allow estuarine fish and shellfish ingress and egress (i.e., white and brown shrimp and blue crabs).

Southwest Coast Chenier Restoration - The Service recommends that the ridge restoration features (Cheniers) identified in the Southwest Coast Region of the 2012 State Master Plan be included in the 2017 Plan. Cheniers act as natural levees against storm surges, provide habitat for wildlife resources in the face of climate change, and are a first line of defense that front thousands of acres of estuarine marsh including marshes and coastal prairies managed by the National Wildlife Refuge system. Further, Cheniers provide important stopover habitat for large densities of trans-Gulf migrating songbirds.

Chenier forested habitats are threatened by invasive species, reduction in native forested, scrub-shrub, and grassland vegetation due to cattle grazing, shoreline erosion, marsh loss, sea-level rise, and development pressure. Protecting the Southwestern LA Chenier habitat and restoring it to pre-Rita conditions by reforestation will improve, protect and maintain an invaluable existing land feature and natural habitat and improve risk reduction inland areas in a cost-effective manner.

Pages 106, 110, Marsh Creation East of White Lake (004.MC.102) – The Service recommends the removal or a scaling-down of this marsh creation feature east of White Lake. This is not an area of restoration need; the land loss rate is very low in this area. An examination of aerial photography indicates very little land loss.

Pages 106, 111, Pecan Island Ridge Restoration (004.RC.03) – The Service recommends that the Pecan Island Ridge restoration feature be eliminated and more marsh creation southwest of Pecan Island be included in the 2017 Plan. This ridge restoration feature would be costly and extremely difficult to implement given the extent of Pecan Island development. The measure would also affect some existing Chenier forests and woody habitats, which have suffered severe losses throughout the coastal area.

Marsh Creation Southwest of Pecan Island – The Service recommends that Pecan Island Ridge Restoration funding be used to include marsh creation southwest of Pecan Island to Rollover Bayou. Historic land loss has been great in this area.

Page 106, East Rainey Marsh Creation (004.MC.07) - The vast majority of this area, east of Freshwater Bayou to Vermilion Bay, has minimal open water and does not appear to be in need of restoration (1985-2016 USGS loss rate is +0.05 %/year; a gain). This measure could be eliminated or scaled down to make funds available for other projects with greater need.

## Central Coast

Page 107, Marsh Island Marsh Creation (03b.MC.03) – Much of the Marsh Island marsh creation features could be reduced or eliminated due to low loss rates, except for the northeastern tip of the island. Loss rates for western Marsh Island are -0.07%/year and -0.04%/year for eastern Marsh Island.

Pages 107, 111, Point au Fer Island Marsh Creation (03b.MC.09) – The Service recommends the elimination of this measure because it is not an area of restoration need. Currently, Point au Fer Island is in the direct sediment influence of the Atchafalaya River and is stable. Interior loss rates for Point au Fer Island are -0.06%/year for the western portion of the island and +0.02%/year for the eastern portion. We recommend that marsh creation planned for Pointe Au Fer Island be relocated to areas of need in the upper Terrebonne and Timbalier Bay marsh rims, or for southwestern LA Gulf of Mexico shore protection.

Page 112, 113, Increase Atchafalaya Flow to Eastern Terrebonne (03b.DI.04) - The Service supports the implementation of the Increase Atchafalaya Flow to Terrebonne measure to flow more fresh water to eastern Terrebonne Basin marshes currently lacking in freshwater and sediment. To carry the desired flows to areas of need down the Houma Navigation Canal (HNC) and east of the HNC, the proposed Morganza to the Gulf floodgate on the GIWW west of Houma will have to be sized to accommodate the desired flows. The Service recommends the inclusion of a number of smaller water distribution measures to distribute GIWW freshwater flows to central Terrebonne basin marshes.

Pages 113, 114, Mauvais Bois Ridge Restoration (03a.RC.04) - This ridge is partially forested; restoration would result in extensive impacts to those forests, which provide substantial surge reduction benefits and essential forested habitat for trans-Gulf migrating songbirds. The Service recommends that this measure should be reformulated to omit forested sections and focus on areas in need of restoration.

Small Bayou LaPointe Ridge Restoration – The Service recommends that the State include Small Bayou LaPointe Ridge Restoration in the 2017 Plan. This is a better ridge to restore than the Mauvias Bois ridge for providing storm surge protection to the area. It is located south of the sensitive fresh marsh area, which is the site of several CWPPRA projects maintaining this very critical landscape feature, which separates the brackish tidal environment from the fresh water floating marshes of the upper Penchant Basin.

Pages 113, 115, North Lake Boudreaux Shore Protection (03a.SP.100) – The Service recommends that this shoreline protection measure contain an adjoining band of marsh creation. Because of the rapid interior marsh loss rates, this shore protection measure will soon be standing alone surrounded by open water without the added marsh creation.

Southeast Coast

Mississippi River Birdsfoot Delta - The proposed sediment diversions and other large-scale restoration projects contained in the plan may take decades to implement. The Service requests that consideration be given, in the interim, to include sediment diversions and other restoration projects in the Mississippi River Birdsfoot Delta to help maintain deltaic processes and the public lands and resources it contains.

Page 117, 118, Central Wetlands Diversion Project (001.DI.18) – The Service recommends that provisions be included in the Central Wetlands Diversion to provide Paris Road flood protection. The proposed 5,000 cfs Central Wetlands Diversion Project near Violet, LA, would likely cause flooding problems along Paris Road in Chalmette, Louisiana, unless that area was protected from project-induced high water levels.

Pages 117, 118, Adams Bay Ridge Restoration (002.RC.101) - This is a confusing feature, it is not a distributary ridge, and it is the bayward face of marshes along a fault line. Rather than construct a ridge feature on the marsh, a less damaging alternative may be to construct a shore protection feature at this location. If a ridge restoration feature is constructed at this site, it should be armored to reduce wave-related erosion.

The Service supports approval and implementation of the State's 2017 Master Plan, which will provide protection and restoration to the Louisiana coastal zone and quite possibly lead to maintaining and restoring more than 800 square miles (512,000 acres) of marsh in the next 50 years.

We look forward to working with the State to address the above concerns. We appreciate and commend this effort to address the large and complex LA coastal restoration issue, and thank you for the opportunity to be a member of the Framework Development Team and to provide comments on the draft 2017 Master Plan. If your staff has any questions regarding our comments, please have them contact Mr.'s Darryl Clark or Ronald Paille of our staff at 337/291-3100.

Sincerely,



Jeffrey D. Weller  
Program Supervisor  
Arkansas, Louisiana, Mississippi,  
and Alabama

Enclosure: Coastal Louisiana Threatened and Endangered Species List

cc: (via e-mail)

Southeast National Wildlife Refuges Complex, Lacombe, Louisiana

Southwest National Wildlife Refuges Complex, Bell City, Louisiana

NOAA, NMFS, Baton Rouge, Louisiana

US EPA, Dallas, Texas

Department of Agriculture, NRCS, Denham Springs and Alexandria, Louisiana

Corps of Engineers, New Orleans, Louisiana

Louisiana Coastal Protection and Restoration Authority, Baton Rouge, Louisiana

Louisiana Department of Wildlife and Fisheries, Baton Rouge, Louisiana

Louisiana Department of Natural Resources, Office of Coastal Management, Baton  
Rouge, Louisiana

State Master Plan Framework Development Team

3/24/2017

**Federally Listed Species in Coastal Louisiana – FWS Responsibility****MAMMALS**

<b><u>MAMMALS</u></b>	<b><u>STATUS*</u></b>	<b><u>DISTRIBUTION IN LOUISIANA</u></b>
Manatee, West Indian ( <i>Trichechus manatus</i> )	E	Lake Pontchartrain & tributaries on North shore; also along LA Gulf coast

**BIRDS**

Plover, piping ( <i>Charadrius melodus</i> )	T, CH	Coastal barrier islands and beaches
Woodpecker, red-cockaded ( <i>Picoides borealis</i> )	E	May occur statewide except in the Delta; but in the coast occurs in Calcasieu, Livingston, Tangipahoa, and St. Tammany Parishes
Knot, red ( <i>Calidris canutus ssp. rufa</i> )	T	Coastal barrier islands and beaches

**REPTILES**

Tortoise, gopher ( <i>Gopherus polyphemus</i> )	T	Washington, St. Tammany, and Tangipahoa Parishes
Turtle, ringed map ( <i>Graptemys oculifera</i> )	T	Pearl and Bogue Chitto Rivers
Turtle, loggerhead sea ( <i>Caretta caretta</i> ) **	T	Coastal waters; Possible/historic nesting on Chandeleur Island chain
Turtle, Kemp's ridley sea ( <i>Lepidochelys kempii</i> ) **	E	Coastal waters
Turtle, green sea ( <i>Chelonia mydas</i> ) **	T	Coastal waters
Turtle, hawksbill sea ( <i>Eretmochelys imbricata</i> ) **	E	Coastal waters
Turtle, leatherback sea ( <i>Dermochelys coriacea</i> ) **	E	Coastal waters

**FISH**

Sturgeon, Atlantic ( <i>Acipenser oxyrinchus desotoi</i> )***T, CH		Pearl River & Lake Pontchartrain & their tributaries
Sturgeon, pallid ( <i>Scaphirhynchus albus</i> )	E	Mississippi River & Atchafalaya Rivers

**INVERTEBRATES**

Mussel, Alabama heelsplitter ( <i>Potamilus inflatus</i> )	T	Amite River
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**PLANTS**

Louisiana quillwort ( <i>Isoetes louisianensis</i> )	E	Washington and St. Tammany Parishes
--	---	-------------------------------------

**Notes:**

Status\*

E = Endangered – any species which is in danger of extinction throughout all or a significant portion of its range.

T = Threatened – any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

C = Candidate – plant and animal taxa considered for possible addition to the List of Endangered and Threatened Species. These are taxa for which the Service has on file sufficient information on biological vulnerability and threat(s) to support issuance of a proposal to list, but issuance of a proposed rule is currently precluded by higher priority listing actions.

\*Critical Habitat – for listed species consists of: (1) the specific areas within the geographical area occupied by the species, at the time it is listed in accordance with the provisions of section 4 of the Act, on which are found those physical or biological features (constituent elements) (a) essential to the conservation of the species and (b) which may require special management considerations or protection; and (2) specific areas outside the geographical area occupied by the species at the time it is listed in accordance with the provisions of section 4 of the Act, upon a determination by the Secretary that such areas are essential for the conservation of the species.

\*\*FWS shares responsibility for sea turtles with National Marine Fisheries Service (NMFS). FWS is the responsible agency for sea turtles on land (i.e., nesting) and NMFS when they are in the marine environment.

\*\*\*FWS shares responsibility for Gulf sturgeon based on project location and lead federal agency.

Notes:

- For Louisiana the FWS web site lists 39 species on the Federal Threatened and Endangered Species List
- In the Louisiana coastal zone, 11 species that are on the Endangered Species List and are under FWS jurisdiction. That group consists of 1 mammal, 3 birds, 2 fish, 3 turtles, 1 mussel, and 1 plant. (FWS shares responsibility for Atlantic sturgeon and nesting loggerhead sea turtles with NMFS).
- The bald eagle was officially removed from the List of Endangered and Threatened Species on August 8, 2007, the brown pelican was officially removed from the List of Endangered and Threatened Species on December 17, 2009, and the Black Bear was removed from the list in May 2015.

# Share Your Thoughts on the 2017 Master Plan!

Let us know what you thought of the  
2017 Draft Coastal Master Plan



Name: Kellyn La Cour-Comant circle meeting location: Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: Houma, Terrebonne, 70360

Email: klacourcomant@its.nicholls.edu

Comments: Thanks for yalls work. But

There are zero non-structural projects proposed for the southernmost

coastal regions, which are most at risk and where many tribal

communities reside, who have been forcibly displaced for centuries. Voluntary

acquisition is a passive aggressive way to phrase forced relocation of climate change

refugees. I understand elevating homes > 14' floods raises insurance rates, but

there are alternatives, i.e. cement homes, floating/tethered homes, houseboats.

To completely disregard these residents and communities is a shame. I put forward to

spending with ya'll more at first month: UHN roundtable.

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov).

Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master

plan, and all comments received will be included in the final master plan's appendices.



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**Name:** Mona Billiot **circle meeting location:** Lake Charles | New Orleans | Houma | Mandeville

**City, Parish, Zip Code:** Houma Terrebonne 70364

**Email:** mpfitre1@live.com

**Comments:** I'm very excited to see a plan to save our State and Homes and look forward in to see more of what will become ounce this Plan is done. Thanks and God Bless our Louisiana.

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



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Name: Toby Reberic circle meeting location: Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: Houma Terrebonne, 70360

Email: Toby@advantagevalve.com

Comments: I own property below the HWY 56 Floodgate I am concerned with the height of water rise on my property since the levee has been installed. Water is regularly not on my property. Since the construction of the levee that has changed. I wonder what my options are moving forward. I will have to raise my land and that will create problems with the current height of my structure.

(flip over and write on back if you need more space)

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So I am just wondering if I am the only person with this problem. I also wonder if there is a setup that I can talk to.



# Share Your Thoughts on the 2017 Master Plan!

Let us know what you thought of the  
2017 Draft Coastal Master Plan

circle meeting location:  
Lake Charles | New Orleans | Houma | Mandeville

Name: Kalli Profit

City, Parish, Zip Code: 70605

Email: kalliprofit@gmail.com

Comments:

Hydrologic restoration is a necessity in the modern age of our environmental design. For the health of the land, the animals, the plants, the water - AND THE PEOPLE.

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



# Share Your Thoughts on the 2017 Master Plan!

Let us know what you thought of the  
2017 Draft Coastal Master Plan

Name: John Allaire circle meeting location: Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: 621 Gulf Beach Hwy Holly Beach 70651

Email: JohnCAllaire@yahoo.com

Comments: You are doing a good job!

Is there any plans for the future to

expand the project CS-59 to include

areas to the east and west of the

current project boundaries.

The entire marsh on the west side of

the Calcasieu River from Hwy 82 north

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.

To the ~~east~~ west extending to Hwy 27.



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2017 Draft Coastal Master Plan

circle meeting location:  
Lake Charles | New Orleans | Houma | Mandeville

Name: Rosa Herrin

City, Parish, Zip Code: New Orleans, LA 70122

Email: rosa.herrin@oxfam.org

Comments: The Draft plan is missing a community economic development approach. Communities most at risk should be prioritize. CPRA needs to provide accurate, accessible & consistent information using trusted partners. Public input & citizens' science should be taken more seriously. Community stakeholder group's feedback must be given equal weight in the planning process.

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.

see back

- Structural projects must be accompanied by non structural mitigation measures.
- For every 80 units allocated or spent on structural projects, 20 units must be allocated or spent on nonstructural projects.



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Let us know what you thought of the  
2017 Draft Coastal Master Plan

Name: Ray Armin Jr. circle meeting location: Lake Charles / New Orleans / Houma / Mandeville

City, Parish, Zip Code: New Iberia Iberia parish, 70560

Email: Iberialeeve@gmail.com

Comments: In the 2017 master plan there is no weight given to shoreline protection except where it creates a ~~small~~ <sup>prescribed</sup> amount of Marsh Creation. Although Marsh Creation is important protection of what is currently present is very important also. Shoreline protection will create some marsh, but ~~the~~ the standards of multiple square acres or more is too big of a leap. Shoreline protection should be weighted to recognize its ability to ~~some what~~ <sup>lose</sup> ~~has not yet been lost.~~ <sup>fill in</sup> ~~Not sure what you want to say yet?~~ <sup>fill in</sup> ~~Fill out a comment form online at coastal.la.gov. Or email us at masterplan@la.gov.~~ <sup>fill in</sup> ~~Public comments will be accepted until March 26, 2017. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.~~



Thanks for what you have accomplished  
TODATE

# Share Your Thoughts on the 2017 Master Plan!

Let us know what you thought of the  
2017 Draft Coastal Master Plan

2017 Coastal Master Plan: Public Comments

Name: John Allaire  circle meeting location:  
Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: 621 Gulf Beach Hwy, Holly Beach, LA 70053

Email: JohnCAllaire@yahoo.com

Comments: ① @ Du Project CS 31 Holly Beach Sand Management there has been a loss of over 50' of shoreline sand to a depth of 3 feet in T 15S, R10W sections 28, 27, 26, 25, 24, 23, 22. Is there a plan to address this situation?  
② Is anyone monitoring this situation?

(flip over and write on back if you need more space)

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



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Name: Polly Glover circle meeting location: Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: Ascension parish

Email: Polly.glover@apsborg

Comments: As a board member of CRCL I applauded the CPRA for a rigorous approach to implementing sediment diversions in the 2017 Master Plan. Please consider expediting the diversions to add more land for the next generations who inherit our CRISIS! Sincerely Polly Glover  
(flip over and write on back if you need more space)

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



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Name: Amanda Voisin circle meeting location: (Houma) Mandeville

Lake Charles | New Orleans

City, Parish, Zip Code: 4876 Hwy 1, Marshes LA 70375, Lafourche Parish

Email: voisina@lafourche.gov

Comments: More detailed written comments will be submitted at a later date

- Appreciate Marsh Creation being included on both sides of Hwy 1 below Golden Meadow - protecting Hwy 1 is parish priority
- Include North Barataria Bay Marsh Creation in Master Plan (modelled but not included in Draft); Extend lower Barataria MC - Component A westward
- Trade off to include and modify the above projects → remove Area Sediment Diversion (reasons will be included in more detail in written comments)

(flip over and write on back if you need more space)

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



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Let us know what you thought of the  
2017 Draft Coastal Master Plan

circle meeting location:  
Lake Charles | New Orleans | Houma | Mandeville

Name: Daniel Rector

City, Parish, Zip Code: Covington, LA 70435

Email: danielrector2014@gmail.com

Comments:

would like to comment on the  
reason for the biggest loss of wetlands

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



# Share Your Thoughts on the 2017 Master Plan!

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2017 Draft Coastal Master Plan

Name: Khair Nguyen circle meeting location: Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: \_\_\_\_\_

Email: khairnguyen@mgawncdc.org

Comments: Will there be business development assistance for those that will be affected by structural projects such as shrimpers? These residents will have their livelihoods affected so they may need to change careers. If the structural projects cause this, there should be programs that will help them.

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



# Share Your Thoughts on the 2017 Master Plan!

Let us know what you thought of the  
2017 Draft Coastal Master Plan

circle meeting location:

Lake Charles | New Orleans | Houma | Mandeville

Name: Charles C. Mespeler

City, Parish, Zip Code: N.D., Orleans, 70115

Email: N/A

Comments:

We must keep est. much salt/water out. With multiple lines of raised ferries to keep as much fresh water working for us.

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



# Share Your Thoughts on the 2017 Master Plan!

Let us know what you thought of the  
2017 Draft Coastal Master Plan

Name: Arthur Johnson circle meeting location: Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: Kenner, Jefferson, 70065

Email: artjohnson51@hotmail.com

Comments: The Master Plan does not appear to make use of  
subsurface geology (such as shallow faulting) that  
creates or enhances localized land loss. New interpretations  
of geophysical data are becoming available

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov).  
Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.

## MASTER PLAN MEETING

My name is Warren Coco I am the founder and owner of Go-Devil Mfg. I am 62 years old and have been and avid waterfowl hunter for almost 50 years . My early days of duck hunting started at Manchac then moved on to Pass a Loutre then went to Hackberry La then to Maurepas Swamp when that played out due to nonnative vegetation I was fortunate enough to buy 1600 acres of marshland in Cameron parish south west of Hackberry La. I have also been blessed with an opportunity to purchase interest in a 2200-acre cotton and soybean farm located on the Red and Black rivers in Catahoula parish. I manage both properties for waterfowl. I have been hunting and fishing on the coast of Louisiana for 44 years and have seen firsthand the losses from coastal erosion. One of my best bass fishing spots at Pass a Loutre is now 300 yards in the Gulf of Mexico. In my travels across the coast I got to meet a lot of the old timers and heard the stories of hunting and fishing of years ago. One comment made after Hurricanes Betsy and Camille by Bennie Loga who was the manager of the Pass a Loutre WMA the only way they are going to save this land is to dynamite the pass banks. This is now being done and they are called diversions. If the powers to be would have listened to Bennie the mouth of the river would be in a lot better shape now. I can remember when Christmas trees were being collected and placed between fences to try to build sediments. This process has been pretty much abandoned now that terrace levees are being constructed. Diversions, terraces and pumping dredge spoil into open water areas are the only we are going to try to save what we have left. Saving the coast of Louisiana is going to be a very expensive process. I know this first hand I am doing a wetland restoration project on my property in Hackberry to restore the hydrology as it used to be before the ship channels were dug on the Sabine and Calcasieu. I purchased a Marsh Buggy Excavator to do this project. I have moved every yard of dirt on this project myself. I have built 2-1/2 miles of terrace levees and in process of building a protection levee 2 miles long with water control structures and have planted grass on all of it. I also do the maintenance on this machine such as sandblasting, painting chain replacement. I am due to replace the chains this summer for the second time at a cost of 11,000 dollars for chains and bolts no labor. I have not applied for any federal or state funding for this project. I have paid the entire bill out of my pocket. Ducks Unlimited donated the structures on my property. I put a conservation on my property in Cameron several years ago through Ducks Unlimited to the Americas wetlands trust. I received a tax credit for this. Ducks Unlimited received a 480,000 Dollars in matching funds to spend on projects. Ducks Unlimited has now applied for matching funds for the work I am currently doing to the value of 594,000 dollars which will be spent on wetland projects. I am proud to be a part of restoring the coast and also generating funds to do more. One thing that really upsets me are the people that cry about monies being spent on the Rich man's property. They need to understand that most of the wetlands in this state are private ownership and the landowners pay taxes on it. I am going to quote Hugh Bateman whom retired from the Louisiana Dept. of Wildlife and Fisheries then went to work for Ducks Unlimited on landowner projects who is now retired. He said show me a poor man with some property that will qualify for a project and we will be happy to do one on his property. Browsing the internet this morning I am seeing different people objecting to these diversions because the Freshwater will change the water where they are fishing. These are probably the same people that are fishing where their grandfathers once trapped. 25 years ago I made a statement that I can fix the coast of Louisiana. Give me the keys to the Big Monster (Army Corps of Engineers) and I will make the Mississippi River flow west to Texas. But you have to tell all the special interest to go you know where. In the process now proposed with the master plan is going to affect some people. You can never make everyone happy. They need to look at the whole big picture and for the greater good of the wetlands. I totally support the master plan that is proposed with all of

the projects. None of these projects will directly affect my property but in the long haul will help protect my property and the properties around me. I fell every sportsman needs to get behind this Master Plan and also support organizations such as Ducks Unlimited Vanishing Paradise and other organizations that are dedicated in preserving our wetlands. Thank you for giving me the opportunity to express my thoughts on this project.

## 2017 Louisiana Coastal Master Plan Comments

*As presented by South Central Industrial Association*

- **Get restoration done now:** One of the most significant and urgent issues facing our state is the loss of our coast. We must act to secure a strong, safe and productive future for the people, wildlife and industries of coastal Louisiana.
  - We applaud the plan again acknowledging the importance of our “working coast” and our contributions to the national economy.
  - We are encouraged to see the draft master plan include implementation periods that prioritize how projects should be advanced over time.
  - We are supportive of the prioritization of projects that are allocated funds regardless of implementation period. (i.e. 50ft channel draft provides sediment to complete Golden Meadow to Fourchon Marsh Creation, it should “jump” from 2<sup>nd</sup> implementation period to 1<sup>st</sup>.)
- **We support the consistency of the master plan process,** as it is publicly-informed, grounded in the best available science, balances coastal restoration with protection and is realistic about the challenges we face.
  - Now more than ever, there will be national and international attention on this ambitious restoration effort, and this undoubtedly includes any potential future investors in the industries of coastal Louisiana. The “red” Future Without Action Map (which is a misnomer) conveys an unsustainable business environment for many areas along our coast, including Port Fourchon.
- **Louisiana’s land loss crisis requires a comprehensive suite of restoration projects,** including delivering freshwater and sediment, barrier islands, marsh creation, hydrologic restoration, ridge restoration, shoreline protection and oyster reef restoration.
  - Supportive of barrier island and headland restoration and maintenance, an important component of our coastal restoration toolkit that should be prioritized and funded going forward.
- We need to **put our existing funding resources to work wisely – and quickly – and secure additional resources** to maintain as much of the Louisiana we all know and love.
  - In addition to the steady revenue stream coming to the state over the next 15 years from the BP settlement, the people of Louisiana and its leaders must develop additional and dependable revenue streams and cost-saving opportunities, such as bonding and creative financing for projects, to fund the master plan in its entirety. Many of our members have experience in this area, and we want to be a resource to the State in this arena.
- **The state should take advantage of the tremendous economic and job creation opportunities available by advancing the master plan.**
  - Over the next 10 years, nearly 60,000 jobs will be supported by investments in restoration, with 24,000 jobs created in the New Orleans region alone in water management and energy sectors.
  - Recent analysis has shown the water management sector is the fastest growing job sector in Louisiana’s Coastal Zone, with an average salary of nearly \$70,000.
  - SCIA prides itself on our accomplishments in workforce development, and we support the expansion and inclusion of the water management sector in the arena, as it provides diversity and support of our industry.

**South Central Industrial Association – PO Box 2143 – Houma, LA 70361 – 985-851-2201**  
**The Atrium - Suite 500 B**  
**1340 Tunnel Boulevard, Houma, LA 70360**  
**Jane Arnette, Executive Director**  
**[jane@sciaonline.net](mailto:jane@sciaonline.net)**



## ST. MARY LEVEE DISTRICT

7327 Hwy 182 East

P.O. Box 2079

Morgan City, LA 70381

(985) 380-5500

As Executive Director of the St. Mary Levee District I would like to offer the following comments to the CPRA's State Master Plan for 2017.

1. We would encourage the CPRA Board to include the Bayou Chene Flood Protection and Diversion project in the 2017 plan. This project was previously included in the 2012 plan. I believe it was included in the plan primarily due to the success of the temporary project implemented in 2011, which protected property with an assessed valuation of over \$300,000,000, and a population of over 28,000 Louisiana residents from the potential devastation due to the River Flood of 2011. We were quite disappointed in its exclusion from the 2017 plan despite the fact that once again temporary flood protection measures were necessary in early 2016 as the USACE threatened to again operate the Morganza Spillway for only the third time in its history. These historic floods seem to be coming with more regularity. This project has proven itself as an effective method at preventing flooding at a cost that is very reasonable when compared to other project alternatives identified for this area. Additionally, this project enjoys regional support as the entire 6 parish region recognizes the benefit of this project and has pledged to us their support. I also enclose a copy of the resolution passed by the Board of Commissioners of the St. Mary Levee District in opposition to the exclusion of the Bayou Chene project from the 2017 Master Plan.
2. The Morgan City Back Levee (03b.HP.10) projects are included in the Master Plan however, the implementation period has been extended out to the 31-50 year time period. This project, with State assistance and local funding is nearing construction of significant portions of this project. Its full implementation is critical for our area as it will allow the citizens of Morgan City and surrounding areas of St. Mary Parish to achieve 100 year flood protection and give the residents the Flood Insurance status previously enjoyed. As you know, Coastal Louisiana is a working coast, and as such, having people able to work in this vital region is important. This level of flood protection is critical to maintain the vital economy of the State of Louisiana. A small, timely investment by CPRA in this project will go a long way to providing protection from storm surges and allow for a continuing presence in Coastal Louisiana for critical services.
3. The St. Mary Levee District has developed an interim protection plan for the residents living along Bayou Teche between the Charenton Canal and the Wax Lake Outlet in St. Mary Parish. This project, referred to as the Bayou Teche Flood Protection Project, would provide protection anticipated to be provided by the Iberia/St. Mary Upland Levee Project, however that project (Iberia/St. Mary) will need several other components in order to be effective. For an estimated \$10 million the Bayou Teche Flood Protection project could be implemented and stop several instances of repetitive flood losses due to hurricane storm surge. This protection is permitted by both the La. DNR and the USACE. We simply ask that you recognize the Bayou Teche Flood Protection Project as a separable component of the Iberia/ St. Mary Upland Project.



## ST. MARY LEVEE DISTRICT

7327 Hwy 182 East

P.O. Box 2079

Morgan City, LA 70381

(985) 380-5500

4. The St. Mary Levee District supports the efforts and comments made by the Morgan City Harbor and Terminal District (Port of Morgan City) regarding projects of their interest. Specifically, we support the Point Au Fer (03b.MC.09) restoration project. This project would provide a disposal area for dredged material from the Atchafalaya River which could improve the ability of the River to carry flood flows. Additionally, we support their interest in the Atchafalaya River Long Distance Pipeline Project which has been supported by residents of our region for many years. We all recognize the benefit of healthy marsh lands to our south protecting us from storm surge.
  
5. We would also like for the CPRA to consider the opportunities that would be provided by coordinating the Increase Atchafalaya Flow to Terrebonne project with the Bayou Chene project. We believe this coordination would allow for a more effective River diversion project that would provide fewer local negative impacts.

We plan to offer additional comments for your consideration in the form of written comments prior to the close of the public comment period.

Sincerely,

A handwritten signature in blue ink that reads "Timothy Matte".

Timothy Matte, Executive Director



GORDON E. DOVE  
PARISH PRESIDENT

## OFFICE OF THE PARISH PRESIDENT

TERREBONNE PARISH CONSOLIDATED GOVERNMENT  
P.O. Box 6097  
HOUMA, LOUISIANA 70361-6097



(985) 873-6401  
FAX: (985) 873-6409  
E-MAIL: gdove@tpcg.org

January 24, 2017

Coastal Protection and Restoration Authority  
ATTN: Mr. Johnny Bradberry  
P.O. Box 44027  
Baton Rouge, LA 70804-4027

RE: CPRA 2017 Draft Coastal Master Plan

Dear Mr. Bradberry:

After reviewing Louisiana's Comprehensive Master Plan for a Sustainable Coast-2017 Draft Plan released on January 3, 2017, we have some concerns about elements of the draft plan as they relate to Terrebonne Parish and the Terrebonne Basin located between the Atchafalaya River and Bayou Lafourche. Consequently, we offer the following comments.

As you know, Terrebonne Parish Consolidated Government (TPCG), and the residents and businesses in the Terrebonne Basin have been very active in coastal restoration and hurricane protection for over thirty years. We also wholeheartedly applaud the work your agency has accomplished since its creation in 2005 in the Terrebonne Basin. Although great strides have been taken in the last decade, efforts need to continue as there is still much work to be finished in our local and state coastal restoration and protection plans.

Since plans were first developed in the early 1980s to protect our coast and coastal communities in Terrebonne Parish, these plans have been based on our "multiple lines of defense" strategy which posits that no one element alone will be sufficient to achieve our ultimate goal. Under this strategy, our barrier islands are the first line of defense in this strategy. Next are land bridges/lake rims, and our third line of defense is the Morganza to the Gulf (MTG) Hurricane Protection Levee system. While our hurricane/flood risk reduction strategy contains additional lines of defense, including the internal drainage levees that surround our coastal communities south of Houma, the three mentioned here are most important for our discussion about the 2017 Coastal Master Plan. Our multiple lines of defense strategy was included in both the 2007 and 2012 Coastal Master Plan. Unfortunately, this same strategy is not specifically included in the 2017 plan.

In the 2012 Master Plan, both the Isles Dernieres Barrier Island Restoration and the Timbalier Islands Barrier Island Restoration were included. The aim of these projects was to restore and provide dune, beach, and back barrier marsh habitat and to provide storm surge and wave attenuation for the entire

Terrebonne Basin. Now it appears that CPRA is proposing to transition “from a focus on construction” of our barrier islands “to a focus on strategic maintenance,” thereby eliminating these two projects from the 2017 Coastal Master Plan. Such a transition before these two barrier island chains are completely restored would be a serious mistake and would threaten to dangerously weaken our multiple lines of defense hurricane and storm surge protection strategy upon which the citizens of Terrebonne Parish have relied for many years. Obviously, we request CPRA’s proposed transition to maintenance back to the complete restoration of our barrier islands which include Raccoon, Trinity, East, Wine, and Timbalier Islands, as in the 2012 Master Plan. The restoration of Whiskey Island is currently underway. Our barrier islands as a complete system function to separate the Gulf of Mexico from Terrebonne Bay and Timbalier Bay and serve as our first line of defense against storm surge from hurricanes and tropical events. Rebuilding only part of this system (Whiskey and East Timbalier Islands) will not restore the full functionality of the entire system and make it much more difficult for Terrebonne Parish to safely weather hurricane tidal surge. With no barrier islands between Whiskey Island and East Timbalier Island, a gap of approximately twenty-eight miles, Terrebonne’s first line of defense strategy is seriously compromised.

According to the Louisiana Coastal Area (LCA) Ecosystem Restoration Study–Terrebonne Basin Barrier Shoreline Restoration completed by the Corps of Engineers and CPRA in October 2010,

“The Terrebonne Basin barrier shoreline is a unique ecosystem that helps to maintain the integrity of the gulf shoreline and protects the interior coast from further degradation. Aside from supporting coastal habitats, ***the coastal barrier chains in Louisiana are the first line of defense for protecting wetlands, inland bays, and mainland regions*** [emphasis added] from direct effects of wind, waves, and storms. The barrier systems serve multiple defensive purposes to:

- Reduce coastal flooding during periods of storm surge.
- Prevent direct ocean wave attack, ***which would accelerate rates of erosion and degradation of marshes and other wetlands*** [emphasis added]; and
- Help maintain gradients between saline and freshwater, thereby preserving estuarine systems.”

Because of these unique ecosystem and storm surge values, the Terrebonne Basin barrier island system, from Raccoon Island to East Timbalier Island, must be restored and, therefore, must be included in the 2017 Coastal Master Plan.

In addition to the restoration of Terrebonne’s barrier islands discussed above, the construction of a land bridge/lake rim across eastern Terrebonne from the Bayou Terrebonne ridge to the Bayou Lafourche ridge is a key component of our long term plan to keep Terrebonne Parish intact. This project functions

as our second line of defense to protect the communities of Pointe Aux Chenes, Montegut, Chauvin, Bourg, and even Houma. In addition, it also functions to provide wave attenuation benefits to the MTG hurricane projection levee, specifically Reach J-2. Eastern Terrebonne's survival is based on the construction of this land bridge/lake rim project and the introduction of freshwater via the GIWW, or Bayou Terrebonne, or Bayou Lafourche. Therefore, we request CPRA to include this same land bridge/lake rim project in the 2017 Coastal Master Plan that was included in the 2012 Plan. Without this project we will see twenty-five miles of open water between Timbalier Island and Reach J-2 of Morganza in probably less than a decade, or even more open water if Timbalier Island disappears or is unable to function as needed. If that happens, the future for eastern Terrebonne and its communities is unsustainable.

Also, we note that the Long Distance Sediment Pipeline Project bringing sediment from the lower Atchafalaya River into Terrebonne Parish is not in the 2017 Draft Plan. The State and Terrebonne Parish equally shared in the cost of the feasibility study for this project which determined that the pipeline was the best way to introduce Atchafalaya River sediment into the marshes of southern Terrebonne Parish. This sediment pipeline project would also support the South Terrebonne Marsh Creation site (03a.MC.100) that is included in the 2017 Master Plan. We request, therefore, that you give this sediment pipeline project due consideration for its considerable merits and the marsh creation benefits it promises according to the feasibility study.

We wholeheartedly support and applaud CPRA's inclusion of Morganza to the Gulf levee system in the 2017 plan's short and long term flood protection strategy for Terrebonne Parish. In addition, we also support inclusion of the Bayou Chené Floodgate in western Terrebonne to protect that side of the parish from backwater flooding from the Atchafalaya River when the Corps of Engineers opens the Morganza Spillway (which has been done in recent years).

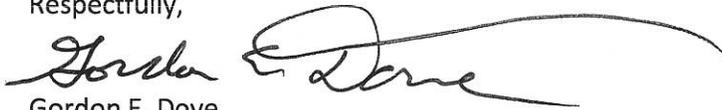
We, of course, are cognizant of the difficult position CPRA faces as it attempts to prioritize projects in such a fiscal and sediment constrained environment. Nevertheless, we would be remiss and do our citizens a disservice if we fail to point out that the omissions in the 2017 Coastal Master Plan, as they relate to Terrebonne Parish, seriously, if not fatally degrade our multiple lines of defense strategy for Terrebonne which is designed to protect us from storm surges from the Gulf of Mexico which is at our doorstep. We must have the complete restoration of all our barrier islands, the land bridge/lake rim in eastern Terrebonne, the completion of the Morganza to the Gulf hurricane protection levee, and the other projects for the Terrebonne Basin in the 2017 draft Plan to ensure our survival.

In our opinion, all of these projects we have mentioned in this letter meet the five main objectives as outlined in the 2017 Coastal Master Plan, namely,

- Flood Protection – Improve flood protection for families and businesses.
- Natural Processes – Harness the natural processes that built our coastal landscape, in this case hydrologic restoration.
- Coastal Habitats – Restore and protect coastal habitats.
- Cultural Heritage – Sustain our unique cultural heritage.
- Working Coast – Ensure that our coast continues to be both a Sportsman’s Paradise and a hub of commerce and industry.

Thank you very much for giving Terrebonne Parish the opportunity to comment on the 2017 Draft Coastal Master Plan. We hope you will be able to comply with our requests.

Respectfully,

A handwritten signature in black ink, appearing to read "Gordon E. Dove", with a long, sweeping horizontal flourish extending to the right.

Gordon E. Dove  
Parish President  
Terrebonne Parish Consolidated Government.

Cc: Council Reading File

January 24, 2017

RE: Coastal Restoration Projects at the Mouth of the Tchefuncte River, in Western St Tammany Parish

To Whom It May Concern,

At a meeting was held on 1/6/17, attended by the following parties and each of their respective engineering firms;

- The Honorable Mayor of the Town of Madisonville (Madisonville) Jean Pelloat
- Several members of the Board of Directors of the Lake Pontchartrain Basin Maritime Museum (LPBMM)
- Several of the Board of Directors of the Tchefuncte River Foundation (TRF),

The above parties have a common goal, to create protective barriers at the mouth of the Tchefuncte River, and at the Tchefuncte River Range Rear Light (Light House) located approximately one third of a mile to the West of the current mouth of the river. The proposed barriers will serve as shoreline protection at the mouth of the River, the public boat launch, the Light House (circa 1868) , the Madisonville 2400+ acre marsh and in turn the Town of Madisonville itself, against wave surge and continued coastal erosion. While each project is in different stages of design, permitting and funding, it was discussed that by combining the projects into one master project with multiple phases that it might A) eliminate any overlap or duplication of effort/need thereby reducing overall costs, and B) simplify the access to funding.

An outline of our projects is as follows:

Phase I - Town of Madisonville represented herein by the LPBMM, under a Light House management agreement dated 5/24/00. Lighthouse area construction of a bulkhead, breakwater and dock/pier to allow for boat access to the Light House. The design is complete, and a Coastal Use permit has been issued dated 11/7/16. \$1.5MM.

Phase II – Tchefuncte River Foundation (TRF) Design Engineering for the Breakwater - Detailed engineering design services, surveying, environmental assessment and permitting - \$275,000

Phase III – Tchefuncte River Foundation (TRF) Construction of the Breakwater - \$3,000,000

Phase IV – Rebuilding of the Land Bridge (along part of the northern side of the Breakwater - approx. 2,000 square yards) - \$100,000

Acknowledging that the focus of CWPPRA is to identify, prepare and fund construction of coastal wetlands restoration projects, we submit that our combined missions achieve that goal. Benefits include Coastal Restoration, land creation and flood prevention, by reducing storm surge and wave action. The Light House is an active aid to navigation, and this project will allow the Museum to promote History,

Education and Tourism. Recreation will also be enhanced with safer boating and fishing at the mouth of the River.

We are available to provide as much detail as needed, for your consideration. Please contact Mayor Pelloat at the Town of Madisonville with questions, requests for more details or to arrange a meeting.

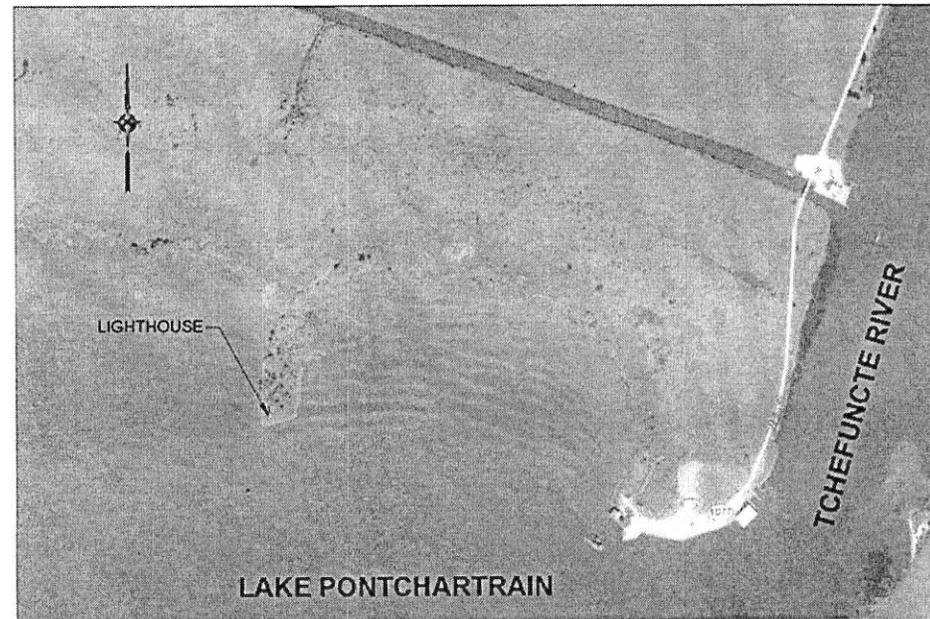
Town of Madisonville  
Mayor Jean Pelloat  
[jpelloatmayor@townofmadisonville.org](mailto:jpelloatmayor@townofmadisonville.org)  
985-845-7311

Lake Pontchartrain Basin Maritime Museum  
Skipper Chenault, President  
[atc@frfirm.com](mailto:atc@frfirm.com)  
985-845-9800

Tchefuncte River Foundation  
Kyle Catalano, President  
[kyle@clean-title.com](mailto:kyle@clean-title.com)  
985-373-5908

# TCHEFUNCTE RIVER LIGHTHOUSE HABITAT RESTORATION & SHORELINE PROTECTION FOR EDUCATIONAL OUTREACH

Rob Delaune, P.E.  
Andrew Woodroof, P.E.

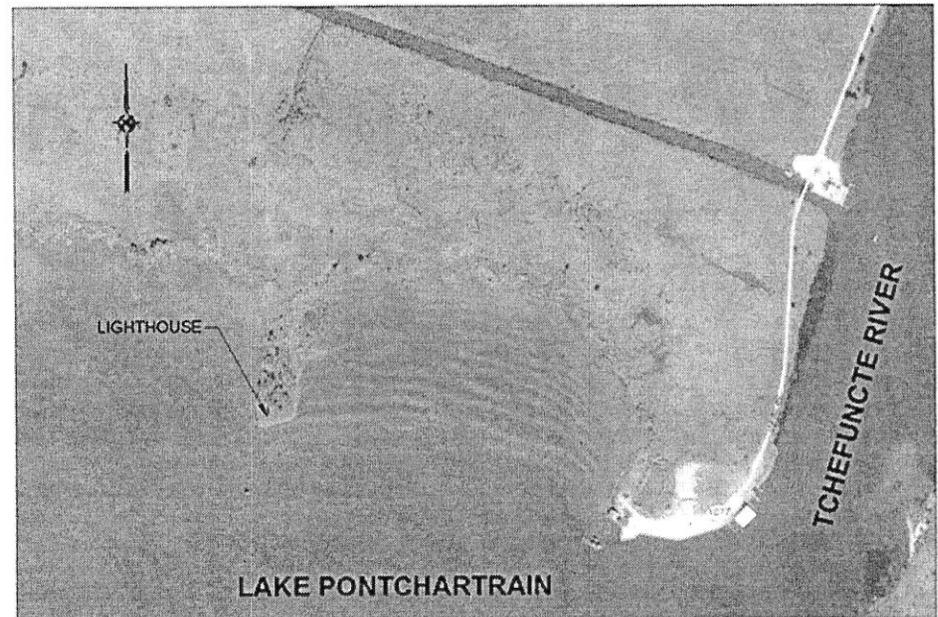


## PROJECT GOALS

1. Protect and maintain the existing shoreline of the peninsula surrounding the Tchefuncte River Lighthouse
  - a. Breakwater
  - b. Bulkhead
2. Construct new dock for access to Tchefuncte River Lighthouse for public education activities

## PROJECT BENEFITS

1. Coastal Protection and Restoration
2. Recreational
3. Educational Outreach
4. Navigation
5. Historic Preservation



# CONSTRUCTION DOCUMENTS

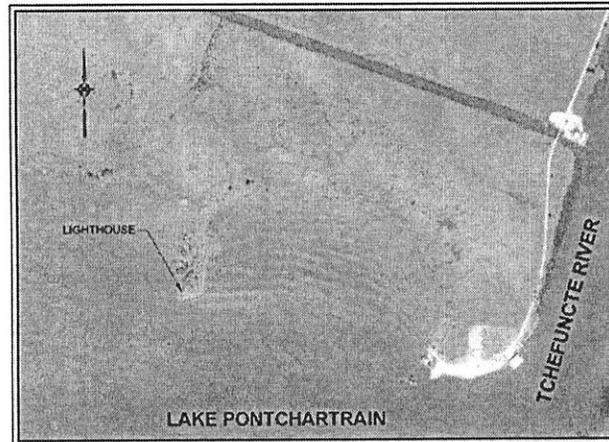
## LAKE PONTCHARTRAIN BASIN MARITIME MUSEUM

TCHEFUNCTE RIVER LIGHTHOUSE HABITAT RESTORATION  
SHORELINE PROTECTION FOR EDUCATIONAL OUTREACH  
TOWN OF MADISONVILLE, LOUISIANA



**INDEX TO SHEETS**

SHEET NO.	DESCRIPTION OF SHEETS
1	TITLE SHEET
2	GENERAL NOTES
3	SUMMARY OF QUANTITIES
4	OVERALL SITE PLAN
5	BREAKWATER DETAILS
6	PIER PLAN SECTIONS & DETAILS
7	PIER SECTIONS & DETAILS
8	PIER AND BREAKWATER PROFILE
9	BULKHEAD SECTIONS & DETAILS
10	CROSS SECTIONS
11	CROSS SECTIONS
12	MARKER HAZARD MARKER DETAILS
13	TURBIDITY CURTAIN DETAILS
14	SURVEY



**LAYOUT MAP**  
SCALE: 1/8" = 1'-0" (AS SHOWN)  
0 50 100 150 200

**LPBMM BOARD OF DIRECTORS - EXECUTIVE COMMITTEE**  
 A. T. SKIPPER CHENAULT      PRESIDENT  
 JOHN GNIADY                  VICE PRESIDENT  
 TOM MEEHAN                 SECRETARY  
 BARNEY KNOESS             TREASURER  
 LYNN HAASE                 PAST PRESIDENT

PREPARED BY AND RECOMMENDED FOR APPROVAL BY:

ANDREW WOODROOF, P.E.      DATE  
 DIGITAL ENGINEERING & IMAGING INC.



APPROVED BY:

DONALD LYNCH      DATE  
 LAKE PONTCHARTRAIN BASIN MARITIME MUSEUM

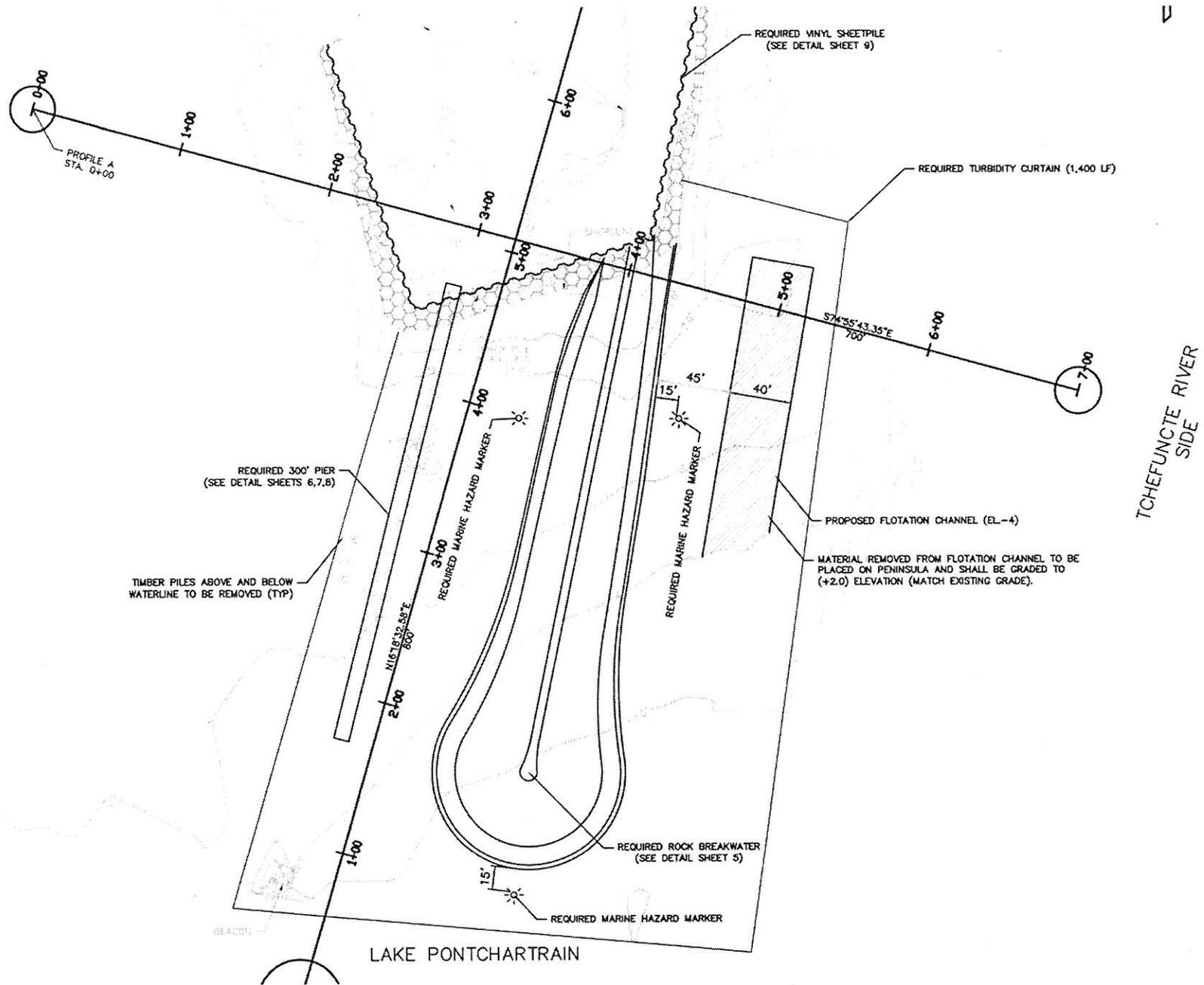
**FINAL**

DES JOB #40-001  
 JANUARY 2018

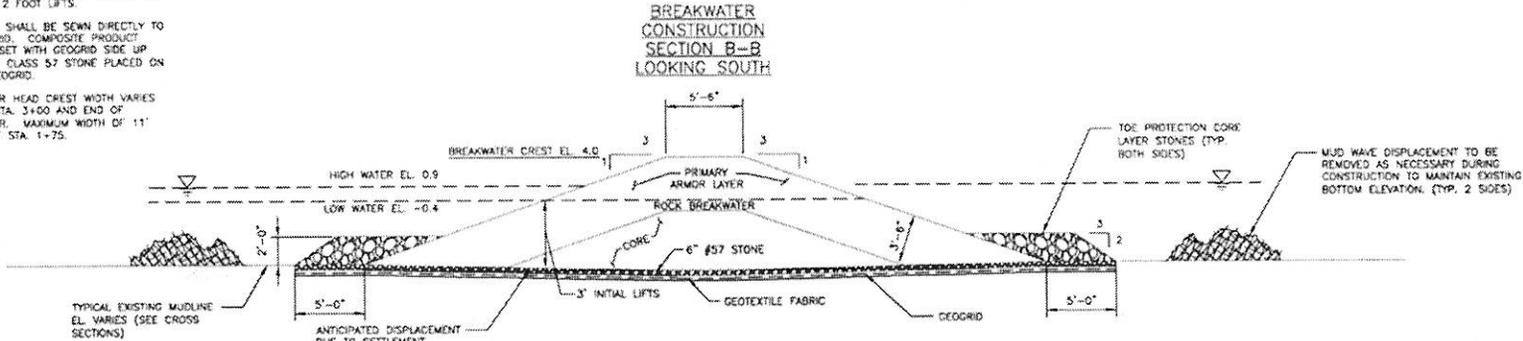
**TYPE OF CONSTRUCTION:**  
 ROCK BREAKWATER CONSTRUCTION  
 PIER CONSTRUCTION  
 BULKHEAD CONSTRUCTION  
 FLOTATION CHANNEL DREDGING



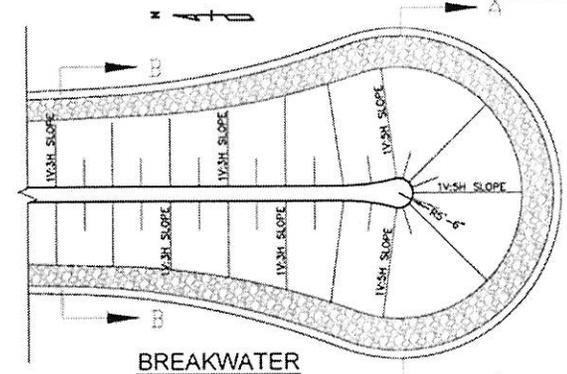
4275 BISHOPVILLE AVENUE, SUITE 200, METairie, LA 70002, (504) 885-6100



- NOTE:
1. STONE SHALL BE PLACED IN 3 FOOT LIFTS UNTIL THE STONE REACHES ABOVE THE WATER SURFACE. STONE PLACED ABOVE THE WATER SURFACE SHOULD BE PLACED IN 2 FOOT LIFTS.
  2. GEOTEXTILE SHALL BE SEWN DIRECTLY TO THE GEGRID. COMPOSITE PRODUCT SHALL BE SET WITH GEGRID SIDE UP AND 6" OF CLASS 57 STONE PLACED ON TOP OF GEOTEXTILE.
  3. BREAKWATER HEAD CREST WIDTH VARIES BETWEEN STA. 3+00 AND END OF BREAKWATER. MAXIMUM WIDTH OF 11' OCCURS AT STA. 1+75.



**TYPICAL SECTION THRU PROPOSED BREAKWATER  
STA. 2+42 TO STA. 5+22**  
SCALE: N.T.S.



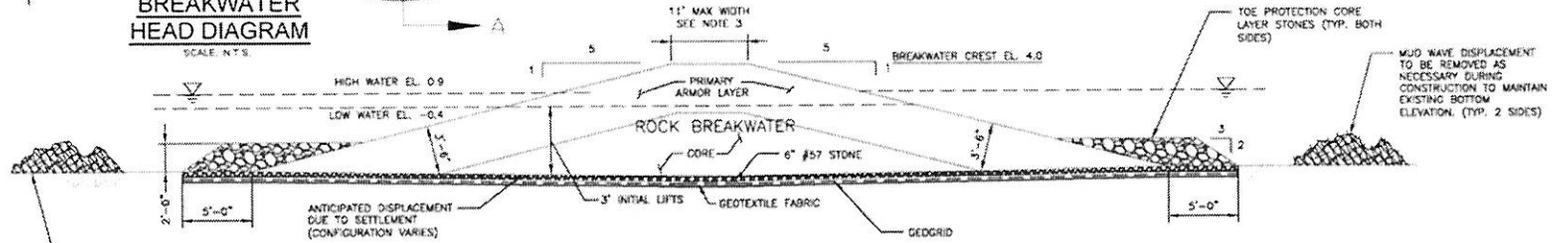
**BREAKWATER HEAD DIAGRAM**  
SCALE: N.T.S.

PRIMARY ARMOR LAYER RIP-RAP GRADATION

PERCENT LIGHTER BY WEIGHT (POUNDS)	GRADATION LIMITS INDIVIDUAL STONE WEIGHT (POUNDS)	
	UPPER LIMIT	LOWER LIMIT
100	1500	600
50	650	300
15	330	100

CORE LAYER RIP-RAP GRADATION

PERCENT LIGHTER BY WEIGHT (POUNDS)	GRADATION LIMITS INDIVIDUAL STONE WEIGHT (POUNDS)	
	UPPER LIMIT	LOWER LIMIT
100	850	260
50	280	130
15	130	40



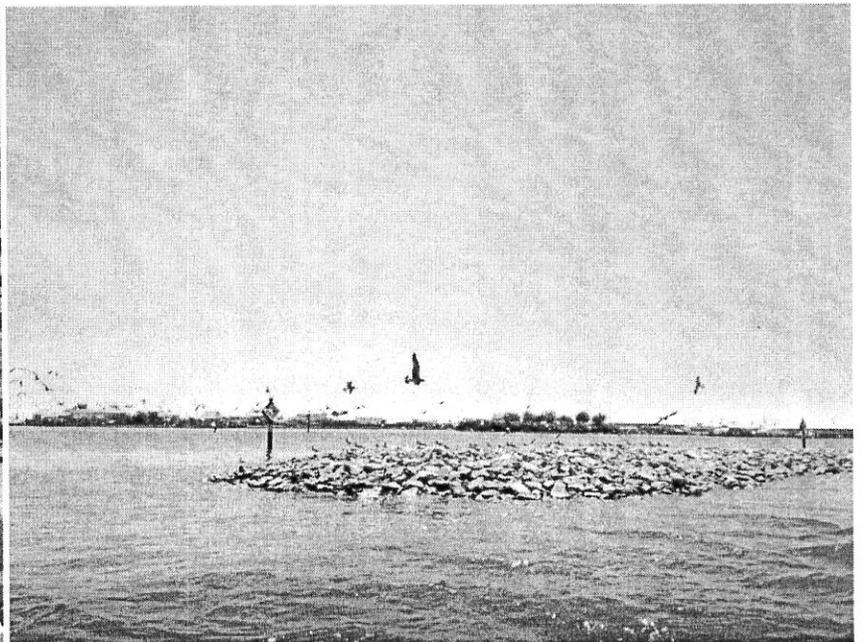
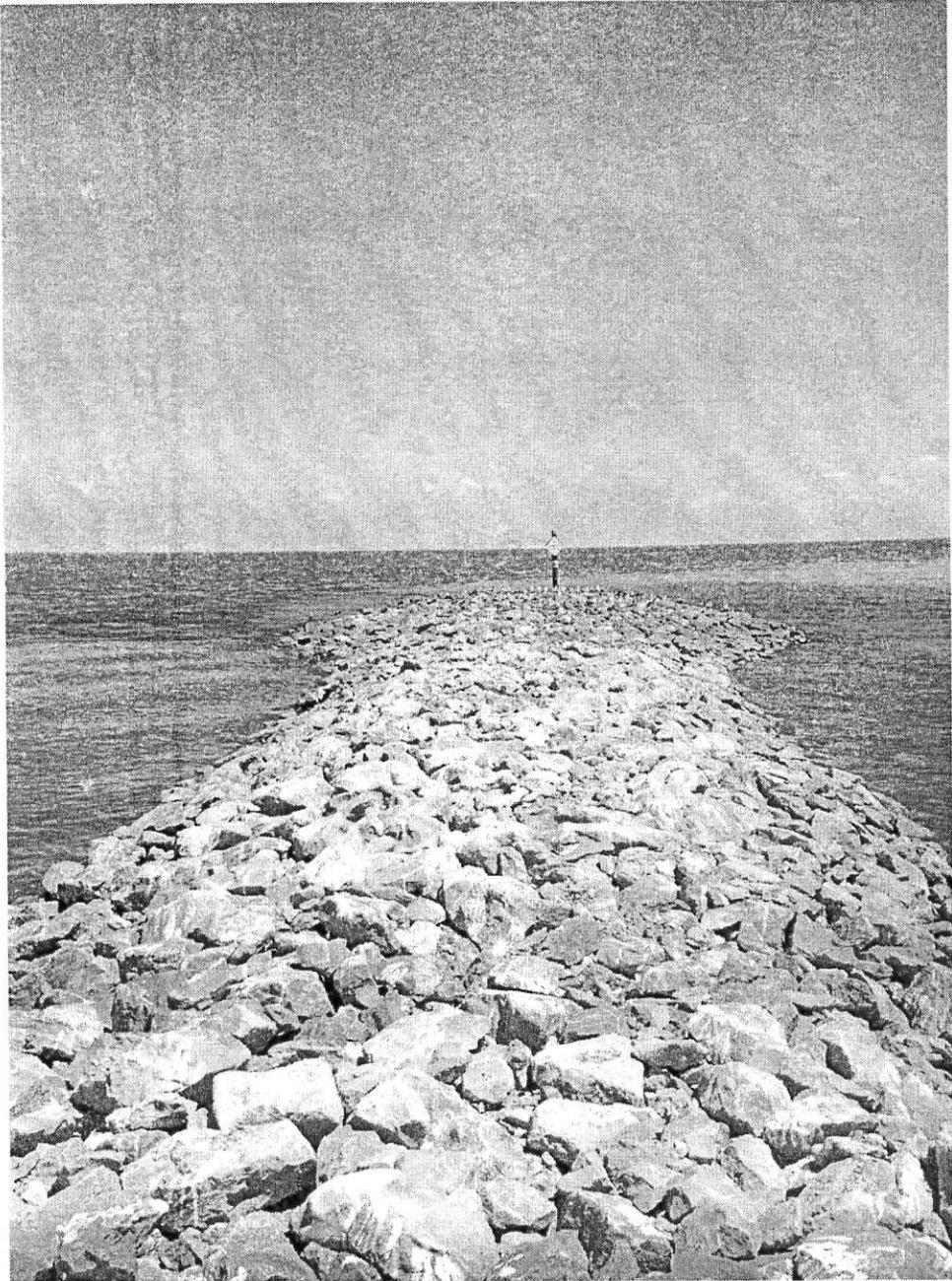
**TYPICAL SECTION THRU PROPOSED BREAKWATER  
STA. 1+34 TO STA. 2+42**  
SCALE: N.T.S.

PROJECT NO.	640-001
DATE	JANUARY 2016
SCALE	NOT TO SCALE
SHEET NO.	5

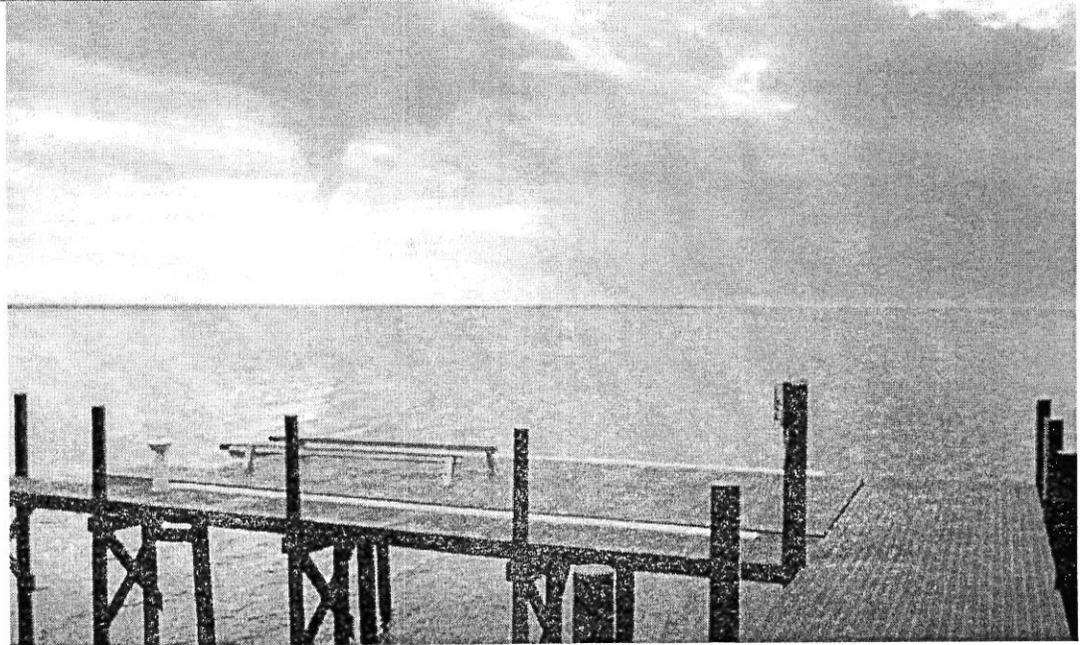
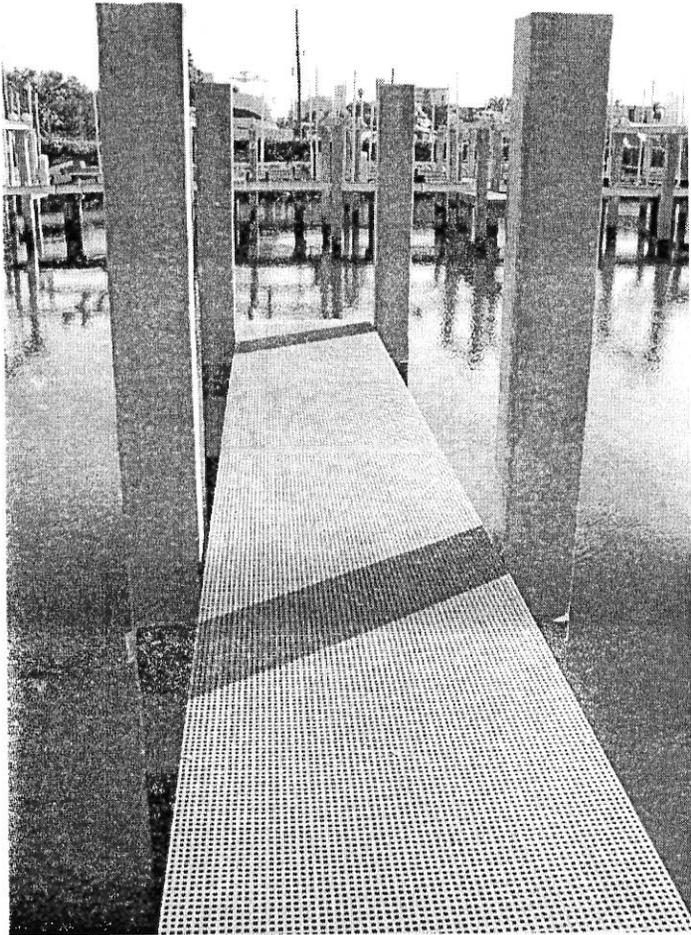
digital engineering

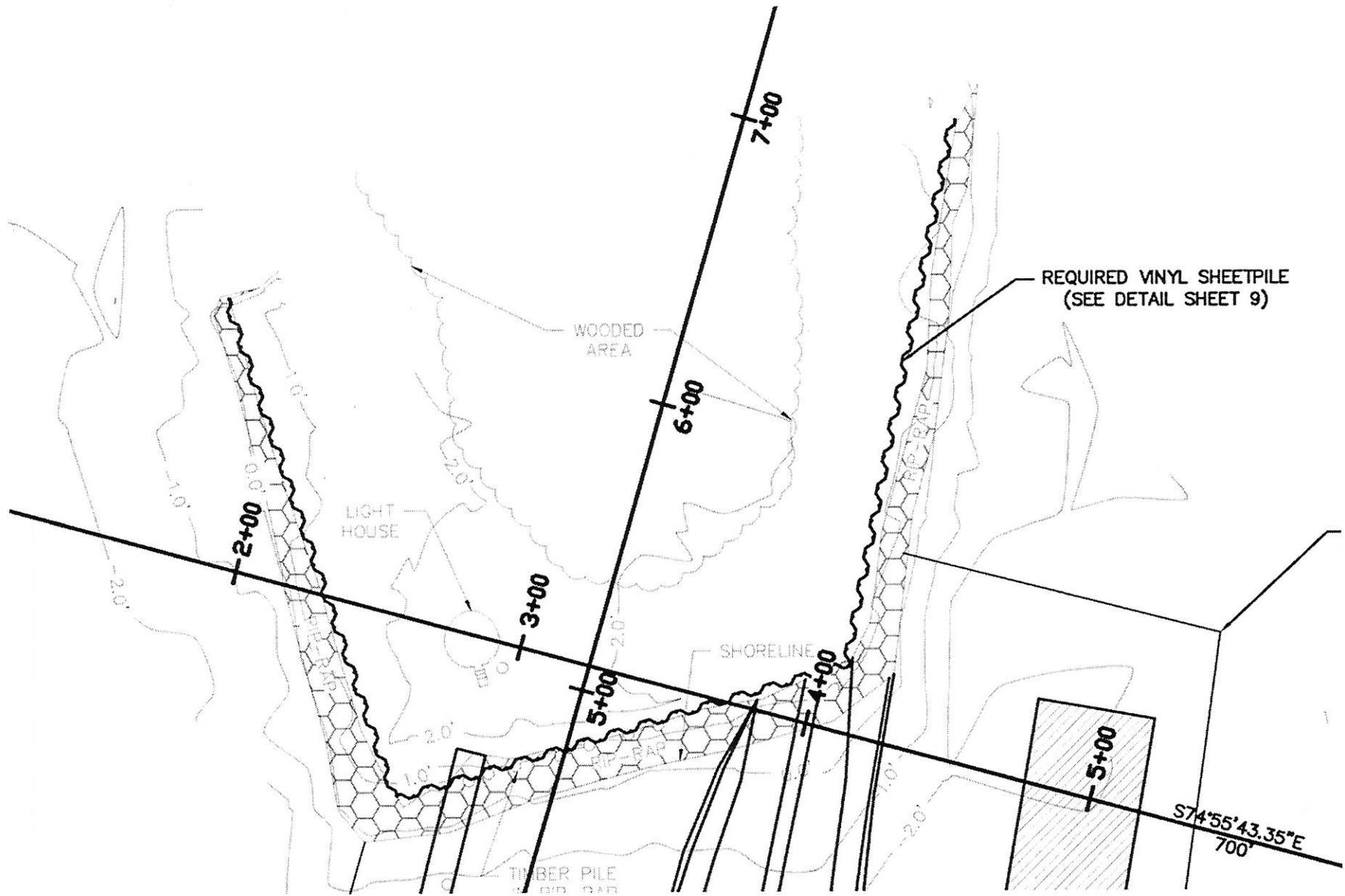
LAKE PONTOCHARTRAIN BASIN MARITIME BOULEVARD  
LAKE PONTOCHARTRAIN BASIN RESTORATION PROGRAM  
TOCHUACTE RIVER LIGHTHOUSE PROTECTION  
87 TAMMANY PARK BOULEVARD  
NEW ORLEANS, LA 70114  
PHONE: 504.586.4400  
FAX: 504.586.4401  
WWW.DIGITALENGINEERING.COM

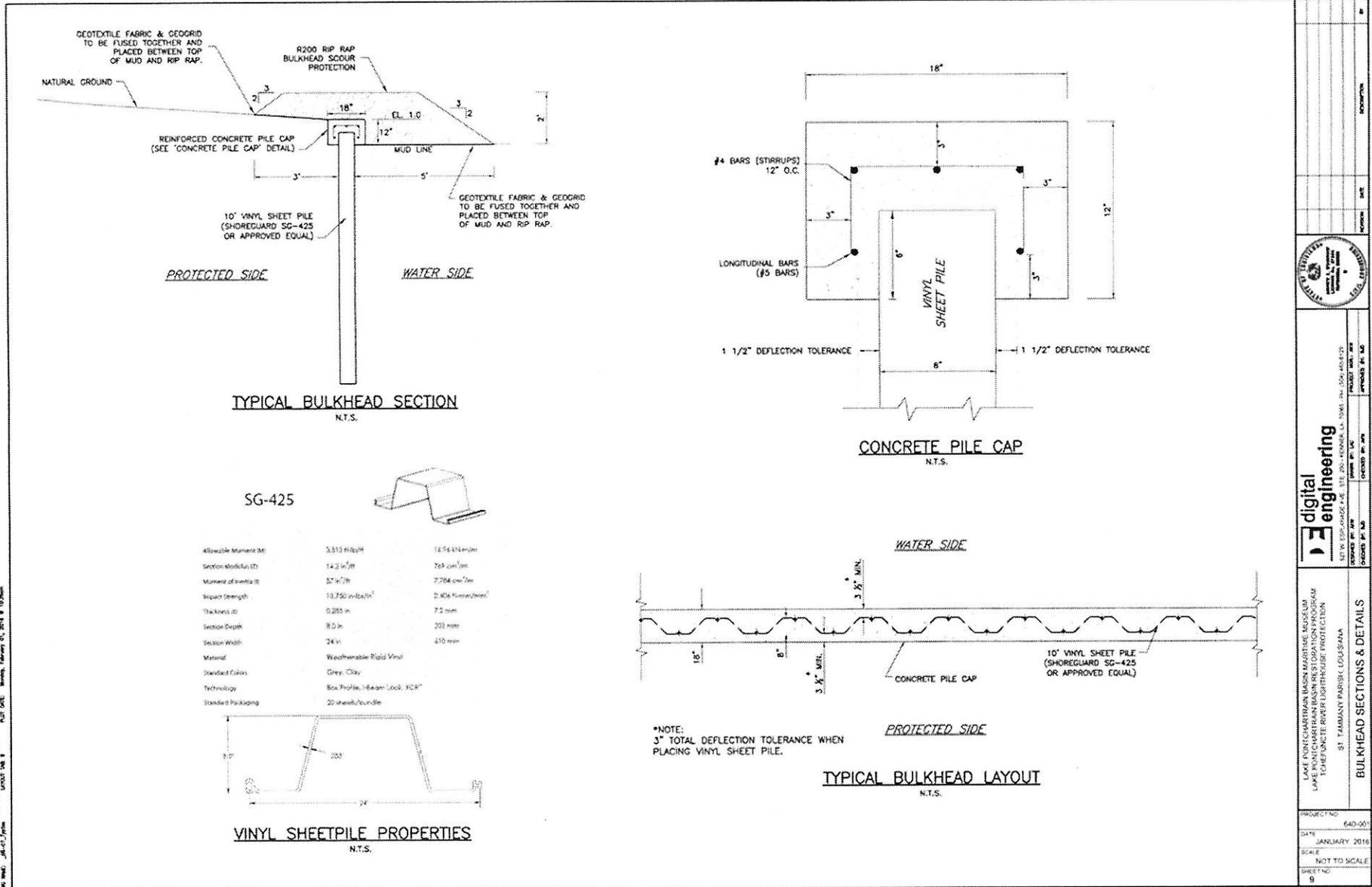
DESIGNED BY: JAC  
CHECKED BY: JAC  
APPROVED BY: JAC









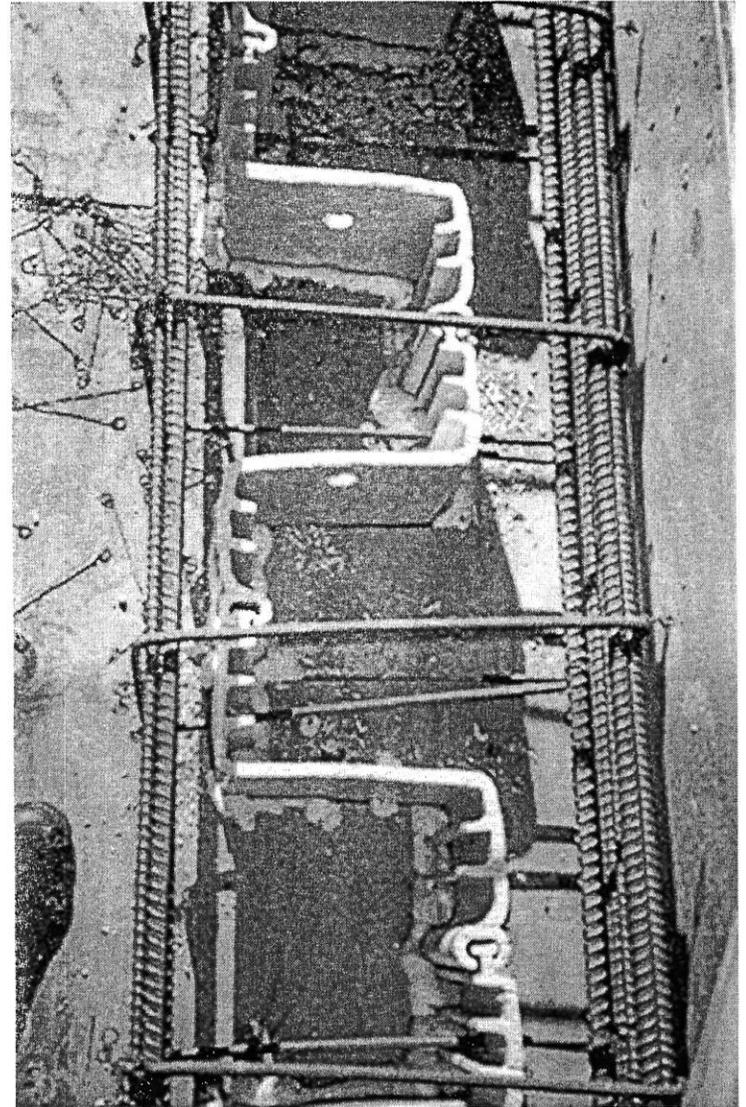
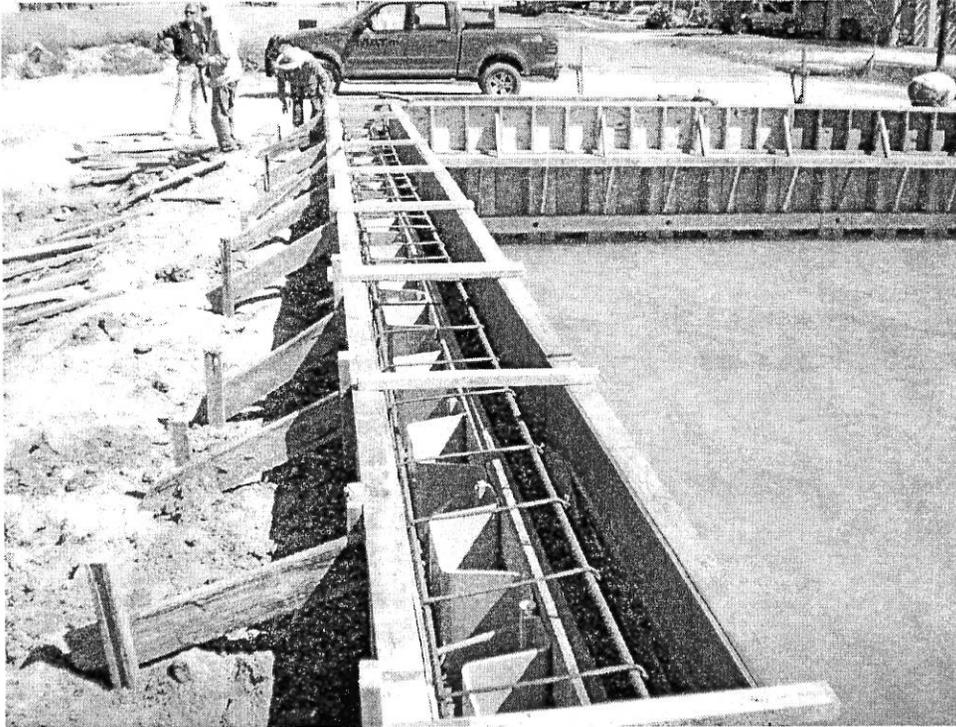


PROJECT NO.	640-001
DATE	JANUARY 2016
SCALE	NOT TO SCALE
SHEET NO.	9

**digital engineering**  
 5175 E. 11th Street, Suite 100, Denver, CO 80231  
 (303) 751-1111  
 www.digital-engineering.com

**BULKHEAD SECTIONS & DETAILS**

LAGI CONSULTING ENGINEERS ARCHITECTS  
 10000 E. 17th Avenue, Suite 100, Denver, CO 80231  
 (303) 751-1111  
 www.lagi.com

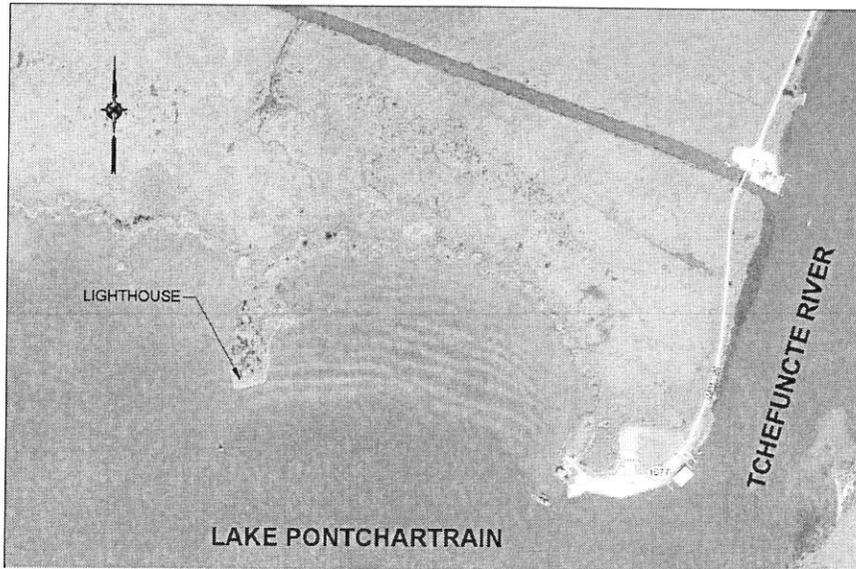


Project Cost Estimate				
Item	Quantity	Unit	Unit Price	Cost (\$)
Mobilization	1	LS	\$60,000.00	\$60,000
Rip-rap R1500	2600	TON	\$70.00	\$182,000
Rip-rap R650	2600	TON	\$70.00	\$182,000
Rip-rap R200	500	TON	\$60.00	\$30,000
Geogrid	2600	SY	\$10.00	\$26,000
#57 Stone	1750	TON	\$60.00	\$105,000
Flotation Channel	250	CY	\$10.00	\$2,500
Turbidity Curtain	1400	LF	\$60.00	\$84,000
Geotextile	2600	SY	\$8.00	\$20,800
Hazard Markers	3	EA	\$6,000.00	\$18,000
Vinyl Sheetpile w/Concrete Cap	6000	SF	\$30.00	\$180,000
Wooden Pier w/Composite Deck	15	20' SPAN	\$11,375.00	\$170,625
Pier Landing Stairs w/Concrete Pad	1	LS	\$10,000.00	\$10,000
Wooden Pile	48	EA	\$2,500.00	\$120,000
Pile Removal	50	EA	\$1,000.00	\$50,000
Fill and Grading	250	CY	\$20.00	\$5,000
Sub-total				\$1,245,925
Contingency (15%)				\$186,889
<b>Construction Total</b>				<b>\$1,432,814</b>
<i>ASCE Consulting Eng. Curve A - 7.25%</i>				
Bidding				\$5,100
Construction Admin. & Record Drawings				\$25,500
Resident Inspection				\$72,000
Materials Testing				\$10,000
<b>Total Project Cost</b>				<b>\$1,545,414</b>

## FACT SHEET

## TCHEFUNCTE RIVER LIGHTHOUSE HABITAT RESTORATION &amp; SHORELINE PROTECTION FOR EDUCATIONAL OUTREACH

The objective of this project is to protect and maintain the existing shoreline of the peninsula surrounding the historic Tchefuncte River Lighthouse which still functions as an aid to navigation and to construct a pier to create access to the lighthouse. Once completed, the pier will be used by the Lake Pontchartrain Basin Maritime Museum (LPBMM) to access the lighthouse for public education activities.



## Project Goals

- Protect and maintain the existing shoreline of the peninsula at the site of the lighthouse
- Construct new pier structure for access to the Tchefuncte River Lighthouse

## Project Location

- Pontchartrain Basin, St. Tammany Parish

## Project Status

- Engineering and Design

## Project Type

- Shoreline Protection
- Educational Activities
- Recreation
- Navigation

## Project Cost

- \$1,545,414.00





**DEPARTMENT OF NATURAL RESOURCES  
OFFICE OF COASTAL MANAGEMENT**

P.O. BOX 44487  
BATON ROUGE, LOUISIANA 70804-4487  
(225)342-7591  
1-800-267-4019

**COASTAL USE PERMIT/CONSISTENCY DETERMINATION**

**C.U.P. No.:** P20160316

**C.O.E. No.:** MVN-2016-0731-EPP

**NAME:** TOWN OF MADISONVILLE  
c/o DIGITAL ENGINEERING  
527 W. ESPLANADE AVE., SUITE 200  
KENNER, LA 70065  
Attn: Andrew Woodroof

**LOCATION:** Saint Tammany Parish, LA  
Lat 30-22-36 N / Long. 90-10-09 W; Lake Ponchartrain; Town of Madisonville, LA -- 70447

**DESCRIPTION:** Proposed construction of a new breakwater and bulkhead to protect the existing Tchefuncte River Lighthouse. In addition, a new pier will be constructed to allow for boat access to lighthouse. Approximately 940 cy of waterbottoms will be excavated for a proposed floatation channel and placed between the proposed bulkhead and shoreline. Approximately 3,630 cy of riprap/stone material will be required.

In accordance with the rules and regulations of the Louisiana Coastal Resources Program and Louisiana R.S. 49, Sections 214.21 to 214.41, the State and Local Coastal Resources Management Act of 1978, as amended, the permittee agrees to:

1. Carry out, perform, and/or operate the use in accordance with the permit conditions, plans and specifications approved by the Department of Natural Resources.
2. Comply with any permit conditions imposed by the Department of Natural Resources.
3. Adjust, alter or remove any structure or other physical evidence of the permitted use if, in the opinion of the Department of Natural Resources, it proves to be beyond the scope of the use as approved or is abandoned.
4. Provide, if required by the Department of Natural Resources, an acceptable surety bond in an appropriate amount to ensure adjustment, alteration, or removal should the Department of Natural Resources determine it necessary.
5. Hold and save the State of Louisiana, the local government, the department, and their officers and employees harmless from any damage to persons or property which might result from the use, including the work, activity, or structure permitted.
6. Certify that the use has been completed in an acceptable and satisfactory manner and in accordance with the plans and specifications approved by the Department of Natural Resources. The Department of Natural Resources may, when appropriate, require such certification to be given by a registered professional engineer.
7. All terms of the permit shall be subject to all applicable federal and state laws and regulations.
8. This permit, or a copy thereof, shall be available for inspection at the site of work at all times during operations.
9. The applicant will notify the Office of Coastal Management of the date on which initiation of the permitted activity described under the "Coastal Use Description" began. The applicant shall notify the Office of Coastal Management by entering a commencement date through the online system, or by mailing said information to OCM.
10. Unless specified elsewhere in this permit, this permit authorizes the initiation of the coastal use described under "Coastal Use Description" for two years from the date of the signature of the Secretary or his designee. If the coastal use is not initiated within this two year period, then this permit will expire and the applicant will be required to submit a new application. Initiation of the coastal use, for the purposes of this permit, means the actual physical beginning of the use of activity for which the permit is required. Initiation does not include preparatory activities, such as movement of equipment onto the coastal use site, expenditure of funds, contracting out of work, or performing activities which by themselves do not require a permit. In addition, the permittee must, in good faith, and with due diligence, reasonably progress toward completion of the project once the coastal use has been initiated.
11. The following special conditions must also be met in order for the use to meet the guidelines of the Coastal Resources Program:
  - a. All logs, stumps and other debris encountered during dredging activities shall be removed from the site during or immediately after the activity and disposed of in accordance with all applicable laws and regulations.
  - b. That permittee shall insure that all sanitary sewage and/or related domestic wastes generated during the subject project activity and at the site, thereafter, as may become necessary shall receive the equivalent of secondary treatment (30 mg/l BOD5) with disinfection prior to discharge into any of the streams or adjacent waters of the area or, in the case of total containment, shall be disposed of in approved sewerage and sewage treatment facilities, as is required by the State Sanitary Code. Such opinion as may be served by those comments offered herein shall not be

Page: 2 of 4  
 C.U.P. No.: P20160316  
 C.O.E. No.: MVN-2016-0731-EPP



construed to suffice as any more formal approval(s) which may be required of possible sanitary details (i.e. provisions) scheduled to be associated with the subject activity. Such shall generally require that appropriate plans and specifications be submitted to the Department of Health and Hospitals for purpose of review and approval prior to any utilization of such provisions.

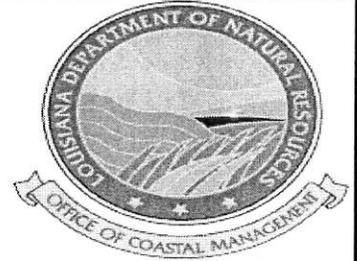
- c. That a Class D permit is received from the Division of Administration, State Land Office prior to the initiation of construction.
- d. All structures built under the authorization and conditions of this permit shall be removed from the site within 120 days of abandonment of the facilities for the herein permitted use, or when these structures fall into a state of disrepair such that they can no longer function as intended. This condition does not preclude the necessity for revising the current permit or obtaining a separate Coastal Use Permit, should one be required, for such removal activities.
- e. Structures must be marked/lighted in accordance with U. S. Coast Guard regulations.
- f. Manatee (*Trichechus manatus*) may occur in the surrounding water bodies of your site location. Manatees are large mammals inhabiting both fresh and salt water. Although most manatees are year round residents of Florida or Central America, they have been known to migrate to areas along the Atlantic and Gulf coast during the summer months. Manatee is an endangered species protected under the Endangered Species Act of 1973 and the Federal Marine Mammal Protection Act of 1972. In Louisiana, taking or harassment of a manatee is in violation of state and federal law. Critical habitat for manatee includes marine submergent vascular vegetation (sea-grass beds). Areas with sea-grass beds should be avoided during project activities if possible. Report all manatee sightings to the Louisiana Department of Wildlife and Fisheries at 225-765-2809 or 1-800-442-2511.

Submerged aquatic vegetation (SAV) may be present in the project vicinity. Submerged aquatic vegetation is considered critically imperiled in Louisiana due to its extreme rarity and vulnerability. This extremely productive community type is known to provide food for a number of species, including the federally endangered manatee (*Trichechus manatus*). SAV acts as nursery areas and provide refuge for the young of many fishes and invertebrates. Work activities should be completed in such manner as to minimize the impacts to this natural community. If the project is to occur at a water depth of 4 feet (1.2 meters) or less, a field visit should be conducted at the worksite to look for evidence of SAV. If no SAV is found near the proposed project, no further consultation with LDWF will be necessary. If SAV is found near the proposed project, further consultation with LDWF will be required. Contact Chris Reid at (225) 765-2820 to coordinate activities.

No other impacts to rare, threatened or endangered species or critical habitats are anticipated from the proposed project. No state or federal parks, wildlife refuges, wildlife management areas or scenic rivers are known at the specified site or within ¼ mile of the proposed project.

The Louisiana Natural Heritage Program (LNHP) reports summarize the existing information known at the time of the request regarding the location in question. LNHP reports should not be considered final statements on the biological elements or areas being considered, nor should they be substituted for on-site surveys required for environmental assessments. If at any time LNHP tracked species are encountered within the project area, please contact our biologist at 225-765-2643.

- g. That a turbidity curtain will be maintained until project completion to avoid excess dredge material(s) from blocking navigational access or entering into adjacent waterways.
- h. This permit does not convey any property rights, mineral rights, or exclusive privileges; nor does it authorize injury to property.
- i. That a commercial water bottom lease is obtained from the Division of Administration, State Land Office at the



Page: 3 of 4  
C.U.P. No.: P20160316  
C.O.E. No.: MVN-2016-0731-EPP

completion of construction activities.

- j. Permittee is subject to all applicable state laws related to damages which are demonstrated to have been caused by this action.
- k. Permittee shall allow representatives of the Office of Coastal Management or authorized agents to make periodic, unannounced inspections to assure the activity being performed is in accordance with the conditions of this permit.
- l. Permittee shall comply with all applicable state laws regarding the need to contact the Louisiana One Call (LOC) system (1-800-272-3020) to locate any buried cables and pipelines.
- m. This permit authorizes the initiation of the Coastal Use described under "Coastal Use Description" for two (2) years from the date of the signature of the Secretary or his designee. Initiation of the Coastal Use, for purposes of this permit, means the actual physical beginning of the use or activity for which the permit is required. Initiation does not include preparatory activities, such as movement of equipment onto the Coastal Use site, expenditure of funds, contracting out of work, or performing activities which by themselves do not require a permit. In addition, Permittee must, in good faith and with due diligence, reasonably progress toward completion of the project once the Coastal Use has been initiated. If the Coastal Use is not initiated within this two (2) year period, an extension may be granted pursuant to the requirements contained in the Rules and Procedures for Coastal Use Permits (Title 43:1.723.D.). Please note that a request for permit extension MUST be made no sooner than one hundred eighty (180) days and no later than sixty (60) days prior to the expiration of the permit.

The expiration date of this permit is five (5) years from the date of the signature of the Secretary or his designee. If the Coastal Use is not completed within this five (5) year period, an extension may be granted pursuant to the requirements contained in the Rules and Procedures for Coastal Use Permits (LAC 43:1.723(D)).

Upon expiration of this permit, a new Coastal Use Permit will be required for completion of any unfinished or uncommenced work items and for any maintenance activities involving dredging or fill that may become necessary. Other types of maintenance activities may also require a new Coastal Use Permit.

- n. This determination does not eliminate the need to obtain a permit from the United States Army, Corps of Engineers or any other Federal, state or local approval that may be required by law. The drawings submitted with your referenced application are attached hereto and made a part of the record.

\*\*\*\*\* End of Conditions \*\*\*\*\*

By accepting this permit the applicant agrees to its terms and conditions.

I affix my signature and issue this permit this 7th day of November, 2016.

THE DEPARTMENT OF NATURAL RESOURCES

Karl L. Morgan, Administrator  
Office of Coastal Management

This agreement becomes binding when signed by Administrator of the Office of Coastal Management Permits/Mitigation Division, Department of Natural Resources.

Attachments

Page: 4 of 4  
C.U.P. No.: P20160316  
C.O.E. No.: MVN-2016-0731-EPP



**Final Plats:**

1) P20160316 Final Plats 10/20/2016

cc: Martin Mayer, COE w/attachments  
Dave Butler, LDWF w/attachments  
Les Rosso, State Land w/attachments  
Johan Forsman, DHH w/attachments  
Elizabeth Hill, DEQ w/attachments  
Jessica Diez, OCM w/attachments  
Craig Leblanc, OCM/FI w/attachments  
Saint Tammany Parish w/attachments

TOWN OF MADISONVILLE w/attachments



# Share Your Thoughts on the 2017 Master Plan!

Let us know what you thought of the  
2017 Draft Coastal Master Plan

Name: Mike Stoute circle meeting location: Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: Earth Lumbion 70533

Email: mstoute44@aol.net

Comments: The major problem in my opinion is we need to slow down tide movement, rebuild coastal reef from Marsh Island + Achif. Decker

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



# Share Your Thoughts on the 2017 Master Plan!

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2017 Draft Coastal Master Plan

circle meeting location:  
Lake Charles | New Orleans | Houma | Mandeville

Name: *Joseph R. Duvier, Jr*

City, Parish, Zip Code: *Exoth, Vermilion 70533*

Email: \_\_\_\_\_

Comments: *Rebuild Coastal Roads that were  
Dredged in 40's 50's 60's*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

[flip over and write on back if you need more space]

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2017 Draft Coastal Master Plan

Name: Troy Dubois circle meeting location: \_\_\_\_\_  
 City, Parish, Zip Code: Delcambre, Vermilion 70528 Lake Charles | New Orleans | Houma | Mandeville  
 Email: troy@delcambre.net or isadore@delcambre.estate@gmail.com

Comments:

Army Core needs to work w/private landowner  
 that want to do projects to protect marshland  
 to make the permit process + cost easier  
 for these projects to happen

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



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Name: Loren Lanzek circle meeting location: Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: Erath, Vermilion 70533

Email: gwendym@gmail.com

Comments:

Need more shoreline protection + channel spoilbanks included (conceptually) in plans.

Terracing and rocks along channels work.

\* mimic natural processes

(flip over and write on back if you need more space)

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



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2017 Draft Coastal Master Plan

Name: ART MI XON circle meeting location: Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: NEW IBERIA LA 70563

Email: ART M @ KCSA CPAS, COM

Comments:

THERE APPEARS TO BE LESS EMPHASIS ON PROTECTION (IN THE SOUTH WEST) IN THE 2017 PLAN COMPARED TO THE 2012 PLAN

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until March 26, 2017. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



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circle meeting location:

Lake Charles | New Orleans | Houma | Mandeville

Name: Ellen Simmons Bales

City, Parish, Zip Code: Orleans, 70118 & Avery Island, Thibodaux 70513

Email: ellenbales@gmail.com

Comments:

Marsh creation projects in Vermilion & Iberville Parishes are vitally important and should be kept. Shoreline protection is equally important and these projects should be put back in the Master Plan - Can't have one without the other!

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.

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2017 Draft Coastal Master Plan

Name: *Ruby Tremiv SR*

circle meeting location:

Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: *New Iberia 70560*

Email: *rayl.brenda@yahoo.com*

Comments:

*Shore line protection should be balanced with marsh creation. ~~is~~ More shore line protection is needed in the 2017 plan.*

*Keep features such as marsh building in Rainedy marshes, Marsh Island, Point Au Fer without these protections to the maintenance will lose our Louisiana.*

[flip over and write on back if you need more space]

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circle meeting location:

Lake Charles | New Orleans | Houma | Mandeville

MAC BALL

City, Parish, Zip Code: NEW ORLEANS 70118 / AVERY ISLAND 70518  
Abbeville

Email: MAC@wbae.com

Comments:

WHY IS SHORELINE PROTECTION NOT (OR  
NO LONGER IN) THE MASTER PLAN and  
WHAT CAN BE DONE ABOUT IT? MARSH  
CREATION + SHORELINE PROTECTION ARE  
BOTH TOOLS NEEDED IN THE TOOL KIT +

~~SHORELINE PROTECTION~~  
SHORELINE PROTECTION IS FAR MORE EFFECTIVE...  
(flip over and write on back if you need more space)

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov).  
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plan, and all comments received will be included in the final master plan's appendices.

— WITHOUT IT MARSH GROWTH IS ENDANGERED —



# Share Your Thoughts on the 2017 Master Plan!

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2017 Draft Coastal Master Plan

Name: Clair Hebert Marceaux circle meeting location: Lake Charles New Orleans | Houma | Mandeville

City, Parish, Zip Code: Cameron, Cameron 70631

Email: clair@cameronparishport.com

Comments: Please consider (adding more than what is already included) more shoreline protection projects; please consider giving some 'approval' or written support of projects that are in the southwest coastal study, but not yet included in the comprehensive Master Plan 2017.

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



# Share Your Thoughts on the 2017 Master Plan!

Let us know what you thought of the  
2017 Draft Coastal Master Plan

Name: M. M. Zell circle meeting location: Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: 70503

Email: mmbell@thetechegroup.com

Comments: If you allow one more tablespoon of dredge material to be dumped in the GOM I'm leaving POT that in the marsh.

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



2017 Coastal Master Plan: Public Comments

# Share Your Thoughts on the 2017 Master Plan!

Let us know what you thought of the  
2017 Draft Coastal Master Plan

Name: Cynthia L. Sellers circle meeting location: Orleans  
Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: Cameron, LA 70631

Email: cyndiselle@hotmail.com

Comments: Without shoreline protection, especially at Bilbo and Bob and Rockefeller Refuges - marsh creation is futile.  
When the beach is gone and salt water reaches to the fresh marsh - it will die and become open salt water.

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



# Share Your Thoughts on the 2017 Master Plan!

Let us know what you thought of the  
2017 Draft Coastal Master Plan

Name: Davy Doney circle meeting location: Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: CAHON 70631

Email: D.Doney@Cahon.net

Comments: Why is the CORE of Eng MAKING Ventura  
Pump 95% ~~to~~ miles BACK to the LAKE, when 1/4  
they could JUST pump it to the Beach  
mile AWAY  
without A 2 yr Delay on PERMIT

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



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Let us know what you thought of the  
2017 Draft Coastal Master Plan

Name: Jeannine Meeds circle meeting location:  
Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: P.O. Box 1546 Lacombe LA 70445

Email: jeannine.meeds@gmail.com

Comments:

Our parish government through their zoning decisions allows building of residences & commercial buildings in areas which are destined to flood (worse with subsidence & sea level rise) and should not be developed. I urge education to parish government officials to

(flip over and write on back if you need more space)

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.

not allow this ill conceived development,



# Share Your Thoughts on the 2017 Master Plan!

Let us know what you thought of the  
2017 Draft Coastal Master Plan

Name: Beth Schwander circle meeting location: Mandeville  
Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: Metairie, Jefferson Parish 70005

Email: h2ofrog123@aol.com

Comments: ~~idea~~ Money earmarked for the Coastal Restoration  
Master Plan should not include elevation of properties.  
FEMA + flood insurance should handle these issues.

Parishes need to work together on flood plain management.

[flip over and write on back if you need more space]

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# Share Your Thoughts on the 2017 Master Plan!

Let us know what you thought of the  
2017 Draft Coastal Master Plan

Name: Stephen J. Champagne circle meeting location: Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: 1133 Louisiana Ave, New Orleans, LA 70115

Email: schampagne2@cox.net

Comments: 1) There are other projects that were not identified prior to the deadline. Will there be other opportunities to present projects, IF so when?

2) Can funding be drawn from both structural and non-structural projects? If it changes the flood elevation

3) Consider the Tchoupart River Area, Wood Island protection, ~~Port of~~ replacement & marsh creation project. [flip over and write on back if you need more space]

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2017 Draft Coastal Master Plan

Name: Captain Brent Bangee's

circle meeting location:  
Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: Baton Rouge, Jefferson, 70036

Email: bandedic@yahoo.com

Comments: I feel we should emphasize more on "fresh water" long term other than temporary displacement due to diversion's for sediment.

[flip over and write on back if you need more space]

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2017 Draft Coastal Master Plan

Name: Adren Biley circle meeting location:  
Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: 3869 Privateer Blvd, ~~St~~ Barataria Island

Email: \_\_\_\_\_

Comments: How will the plan address potentially unemployed fishermen? We would like to know that contractors will hire locally and that training for new jobs would be provided.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

[flip over and write on back if you need more space]

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2017 Draft Coastal Master Plan

Name: Albert L. Dierckx, Jr. circle meeting location:  
Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: 2566 Sean LaPitHe Blvd, LaPitHe, La, 70067

Email: \_\_\_\_\_

Comments: in order of importance what level of  
importance is barrier is, restoration & land building  
on the scale of the master plan.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

[flip over and write on back if you need more space]

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# Share Your Thoughts on the 2017 Master Plan!

Let us know what you thought of the  
2017 Draft Coastal Master Plan

Name: Edward G. Pervin, Sr. circle meeting location: Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: Lafitte, La. Jeff. 70067

Email: \_\_\_\_\_

Comments: Thanks for coming to Lafitte. We need the Barataria Land Bridge completed. Will they use the footprint of this ridge to build a 100yr. hurricane protection levee. This is the only comm. (Parish Jeff.) that is not protected by a hurricane protection levee.

[flip over and write on back if you need more space]

Not sure what you want to say yet? Fill out a comment form online at [coastal.la.gov](http://coastal.la.gov). Or email us at [masterplan@la.gov](mailto:masterplan@la.gov). Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



# Share Your Thoughts on the 2017 Master Plan!

Let us know what you thought of the  
2017 Draft Coastal Master Plan

OVER

Name: Alison Maulhardt

circle meeting location:  
Lake Charles | New Orleans | Houma | Mandeville

City, Parish, Zip Code: \_\_\_\_\_

Email: \_\_\_\_\_

Comments: Presentation: Explain Planning tool  
project selection and ~~the~~ planning process  
and flood modeling. ~~too~~ Not technical  
enough

Maps: 1. I wanted to see a land cover / vegetation  
type map

2. Project map should symbolize Project Ph

[flip over and write on back if you need more space]

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Public comments will be accepted until **March 26, 2017**. Feedback will be used in the development of the final master  
plan, and all comments received will be included in the final master plan's appendices.

3. Included Roads & landmarks on Project map OVER

mention → Call for projects opportunity

### Prioritize Restoration, Diversions, and Protect Birds

Dear Louisiana Coastal Protection & Restoration Authority,

I support the master plan process because the loss of our coast is one of the most urgent problems facing our state and the 100 million birds that live or pass through the Mississippi River Delta each year.

I urge you to put our state's existing funding resources to work wisely--and quickly--to restore our coast for people and for birds. I also encourage the state to work to secure additional resources to maintain as much of the Louisiana we all know and love.

Louisiana should focus funding on large-scale restoration projects first. These projects, including sediment diversions, will have a greater impact over time and support investments made in other restoration and risk-reduction projects.

I am encouraged to see that sediment diversion projects remain a foundation of the 2017 Draft Coastal Master Plan. I implore you to continue prioritizing sediment diversion projects, so we can leverage the Mississippi and Atchafalaya Rivers to build and sustain land as soon as possible.

I support the work CPRA and the state has already begun and hope the state will continue working to get critical restoration projects in place and operational as soon as possible.

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### Mississippi River Gulf Outlet Restoration Priorities

To whom it may concern:

I applaud the 2017 Draft State Coastal Master Plan restoration and protection projects proposed in the ecosystem impacted by the Mississippi River Gulf Outlet. Restoring the ecosystem severely degraded by the MRGO is of great importance and urgency to local communities and to all who support Mississippi River Delta restoration.

The 2017 Draft State Coastal Master Plan addresses critical needs in the 600,000 acres MRGO ecosystem area. I am pleased to see the following proposed restoration projects:

- New Orleans East Landbridge Restoration: providing storm surge protection to over 1.5 million residents;
- Bayou la Loutre Ridge Restoration: providing storm surge protection as well as critical bird habitat;
- Lake Borgne Shoreline Restoration: providing critical to storm surge protection along for levees and communities;
- Central Wetlands Diversion and Marsh Creation: recreating the historic connection between the Mississippi River and the surrounding wetlands to sustain habitat;
- Golden Triangle Marsh Creation: buffering the new surge barrier and enhancing estuarine habitat.

The Coastal Protection and Restoration Authority should consider reassessment of Biloxi Marsh oyster reefs and marsh creation in the plan. The omission of oyster reefs and screening out of large-scale marsh restoration projects in the Biloxi Marsh leaves a gap in storm buffering for communities in St. Bernard Parish and New Orleans, as well as communities in coastal Mississippi and around Lake Pontchartrain. Because of the size and importance of this landscape feature, I request reassessment of the area's performance using smaller project increments, and under an accelerated time frame, to best determine how the area will respond in the future with action.

I appreciate your consideration of these comments. Thank you for your work on this plan, which is critical to the future of Louisiana.

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### Nonstructural Program Support

Louisiana's coastal communities are at risk of getting washed away from rising seas, flooding, and storm surge. It's past time for the state of Louisiana to stand up for the people most at risk of rising seas, coastal land loss and flooding. We urge you to support nonstructural flood protections in the Coastal Master Plan.

Communities know best what they need. The state must provide money, education, and resources so that our communities have the ability to keep their heads above water.

We are past the point where levees and coastal restoration are enough to protect communities.

The state has laid out potential solutions in the Coastal Master Plan like floodproofing, home elevation and voluntary relocation programs, but has not offered much funding to implement these solutions. Gov. Edwards, you must lead the way in providing communities with the resources needed to ensure that they have a future.

Communities like Isle de Jean Charles have developed innovative solutions for maintaining their culture and the future of their community. Unfortunately, most of our most vulnerable communities have not been given access to the resources they need to protect their homes and families. Nonstructural funding is prioritized for communities inside levees, when it is those outside that need the most help.

The Coastal Master Plan exists to make our communities more resilient in the face of sea level rise, wetlands loss, and flooding. Governor Edwards, stand up for nonstructural protections and ensure that our coastal communities have the resources they need to keep their heads above water.

Thank you for protecting our coasts,

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## Nonstructural Program Support (2)

To whom it may concern:

Louisiana's coastal communities are at risk of getting washed away from rising seas, flooding, and storm surge. I'm glad to see that Draft Louisiana Coastal Master plan prioritizes wetland restoration efforts that will make our communities safer and protect our economy in the long run, but we're past the point where levees and coastal restoration alone are enough to protect communities. Louisiana must stand up for the people most at risk of rising seas, coastal land loss and flooding. I urge you to support nonstructural flood protections in the Coastal Master Plan.

Communities know best what they need. The state must provide money, education, and resources so that our communities have the ability to keep their heads above water.

The state has laid out potential solutions in the Coastal Master Plan like floodproofing, home elevation and voluntary relocation programs, but has not offered much funding to implement these solutions. Gov. Edwards, you must lead the way in providing communities with the resources needed to ensure that they have a future.

Communities like Isle de Jean Charles have developed innovative solutions for maintaining their culture and the future of their community. Unfortunately, most of our most vulnerable communities have not been given access to the resources they need to protect their homes and families. Nonstructural funding is prioritized for communities inside levees, when it is those outside that need the most help.

The Coastal Master Plan exists to make our communities more resilient in the face of sea level rise, wetlands loss and flooding. Governor Edwards, stand up for nonstructural protections and ensure that our coastal communities have the resources they need to keep their heads above water.

Thank you for protecting our coasts,

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### Prioritize Large-Scale Restoration and Diversions

Dear CPRA,

I support the master plan process because the loss of our coast is one of the most urgent problems facing our state.

I urge you to put our state's existing funding resources to work wisely – and quickly – to restore our coast. I also encourage the state to work to secure additional resources to maintain as much of the Louisiana we all know and love.

Louisiana should focus funding on large-scale restoration projects first. These projects – including sediment diversions – will have a greater impact over time and support investments made in other restoration and risk-reduction projects.

I am encouraged to see that sediment diversion projects remain a foundation of the 2017 Draft Coastal Master Plan. I implore you to continue prioritizing sediment diversion projects, so we can leverage the Mississippi and Atchafalaya Rivers to build and sustain land as soon as possible.

I support the work CPRA and the state has already begun and hope the state will continue working to get critical restoration projects in place and operational as soon as possible.

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### Support for Restoring the Sportsman's Paradise

Dear CPRA [masterplan@la.gov](mailto:masterplan@la.gov),

I support the master plan process because the loss of our coast is one of the most urgent problems facing our state. Louisiana is losing its Sportsman's Paradise. We must act now - and boldly - if we are to save this paradise for future generations of sportsmen and women.

I urge you to put our state's existing funding resources to work wisely - and quickly - to restore our coast. I also encourage the state to work to secure additional resources to maintain as much of the Louisiana we all know and love.

Louisiana should focus funding on large-scale restoration projects first. These projects - including sediment diversions - will have a greater impact over time and support investments made in other restoration and risk-reduction projects.

I am encouraged to see that sediment diversion projects remain a foundation of the 2017 Draft Coastal Master Plan. I implore you to continue prioritizing sediment diversion projects, so we can leverage the Mississippi and Atchafalaya Rivers to build and sustain land as soon as possible.

The Mississippi River has worked for thousands of years to build the delta we call home. We must put it back to work to save our coast - the sooner the better.

I support the work CPRA and the state has already begun and hope the state will continue working to get critical restoration projects in place and operational as soon as possible. The time to act is now.

Sincerely,

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<b>Public Comment Entry #:</b> 116
<b>First Name:</b> Richard
<b>Last Name:</b> Condrey
<b>City:</b> Baton Rouge
<b>State:</b> LA
<b>Content:</b> March 26, 2017  Re: Figure 4.6  Dear CPRA  The 2017 Draft Master Plan’s Figure 4.6 depicts “Predicted land gained and maintained along the Louisiana coast under the Medium Environmental Scenario over the next 50 years as an outcome of implementing 2017 Coastal Master Plan projects. Red indicates areas predicted to be lost, light green indicates areas where land would be created, and dark green indicates areas where existing land that would otherwise be lost will instead be maintained.”  I have two questions on this figure.  First, most of the barrier islands which lie east of Caillou Bay appear to be red in the figure. Does the figure ‘predict’ that the only remnant of these barrier islands which is expected to remain under the conditions represented by this figure is the Gulf-side area of Grand Isle which is outlined in black? If not, would you explain?  Second, much of the “green” land in the figure will extend out into open water as ‘fingers’ of land as the current land around these “green” areas are “red” and will be lost. From my reading of the historical observations of eye witnesses to our coast from ca. 1537 to 1870, I do not see that these ‘fingers’ are sustainable. Would you direct me to those sections of the draft plan which document the scientific studies which will assure me that these ‘fingers’ of land will be natural sustainable and thus safe for human occupation?  Thank you for your help, Richard Condrey coecnd@lsu.edu
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 115
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<b>Last Name:</b> WILSON
<b>City:</b> RIVER RIDGE
<b>State:</b> LA
<p><b>Content:</b> Andrew C. Wilson 121 Hazel Dr. River Ridge, LA 70123</p> <p>March 26, 2017</p> <p>Mr. Johnny Bradberry, Chairman Coastal Protection and Restoration Authority Governor's Executive Assistant for Coastal Activities Capitol Annex Building, Suite 138 Baton Rouge, LA 70802</p> <p style="text-align: center;">RE: 2017 Draft Louisiana's Comprehensive Master Plan for a Sustainable Coast</p> <p>Dear Mr. Bradberry:</p> <p>As a private citizen, and as an environmental litigator who has represented and advised the State of Louisiana concerning coastal restoration issues at various times for many years, I greatly appreciate the opportunity to comment upon the captioned Master Plan.</p> <p>Initially, I wish to commend the efforts of all those within State government whose efforts over decades have led to this latest Plan which clearly sets forth the State's goals, initiatives and achievements to date, as well as its specific plans for the immediate future, while at the same time describes in detail those issues, hurdles, and obstacles which the State must overcome in order to make this Master Plan a reality. It is also reassuring to note from the Master Plan the actual implementation of the significant land building projects at Bayou Dupont, Schofield Island, Caminada Headlands (I&amp;II), and Caillou Lake Headlands. Additionally, as written, the Plan informs at a comprehensive level not only interested governmental agencies, but stakeholders, all of Louisiana's citizens and hopefully the rest of the country as well, and all this in an interesting and very readable format which, at the same time, captures the spirit and culture that is Louisiana.</p> <p>This said, I am informed by my litigation experience and personal observations that there may be additional issues that should be addressed with greater emphasis. These follow.</p> <p>1. Mitigation for Stakeholders</p> <p>One of the first, major coastal restoration projects was and is the Caernarvon freshwater diversion structure. This project was intended to re-introduce freshwater from the Mississippi River so as to</p>

restore fresher, historical salinity conditions and build land in the Breton Sound hydrological basin within Plaquemines Parish and St. Bernard Parish.

Soon after the structure began operation, multiple lawsuits were filed by oyster leaseholders in 1994, alleging oyster mortality from the freshwater outfall associated with the project. The litigation went on for more than a decade, causing severe delays in multiple coastal restoration projects due to the State's fears of liability exposure. The Caernarvon project itself could not be operated at intended levels due to this litigation. Eventually the litigation concluded in the U.S. Supreme Court in May of 2005, over eleven years after the litigation had been instituted. Tragically, if not ironically, this was just three months before Katrina roared ashore in Breton Sound in August 2005, tearing through wetlands that were never reestablished by the project at intended levels.

The lesson from this situation is that the State must make every effort now to allow oyster harvesters as well as other members of the commercial and recreational fishing communities, and anyone else potentially adversely affected, an optimum opportunity to mitigate any potential losses that might result from the coastal restoration projects associated with the Master Plan. Indeed, as Charles Darwin expressed long ago, adaptation to changes in an ecosystem is the key to survival. To allow the various fishing industries to do so, the State may want to consider heightened levels of communication as to the likely changes to the ecosystem, particularly as regards modeling and/or real-time monitoring of the existing salinity regimes using satellite communication from data collection platforms within the various hydrological basins which will likely be affected by planned projects. In addition, with regard to the oyster industry, the State may want to consider education programs and fostering of "alternative oyster culture" methods involving "off-bottom oyster culture" which would allow oyster farmers to relocate their operations when adverse salinity conditions might occur as a result of freshwater and sediment diversion projects.

## 2. Spreading the word

Throughout this draft of the Master Plan, a recurring theme is the issue of funding. While the Master Plan describes in detail various existing sources of funding, it is clear that the available sources of funding at the present time are inadequate for the task at hand. Consequently, resources must be had elsewhere. To date, it does not appear that significant funding from federal sources is in the offing.

In this regard, during a recent trip to Washington DC last week on behalf of the Orleans Audubon Society/National Audubon Society to meet with members of Louisiana's Congressional delegation, I learned that it will be difficult for the State to procure funding at a level that would meet the State's needs for this dire situation. This is particularly so given the current administration and the Congressional outlook which are both focused on austerity concerns. The only way to change this dynamic is to educate the rest of the country as to: (1) the economic value of the Mississippi River Delta to the rest of the country; (2) the rapidity with which that Delta is being lost, and, (3) the necessity for immediate and effective action to save this invaluable resource.

Recently, at a public hearing in New Orleans, the Colonel for the New Orleans District of the U.S. Corps of Engineers indicated that one of the major sediment-diversion projects included in the Master Plan, the Mid-Barataria Sediment Diversion Project, would likely not receive permit approval until 2022. From a practical standpoint, based upon typical timelines for past coastal restoration projects in Louisiana, this would suggest that in all likelihood, the project would not be in operation until close to 2030. By that time, much of the land at issue will have been lost and the project might well have become obsolete. I strongly encourage the State to work with the Corps and other interested agencies toward coordination and accountability toward moving these projects forward on a more accelerated basis.

Another concern is that other areas of the country which are clearly dependent upon the Mississippi River Delta and the resources of the State of Louisiana, as well as federal agencies including the Corps which oversee activities associated with the Mississippi River, do not appear to be aware of the interdependence and effects of activities occurring upstream from Louisiana. Farmers in the Midwest are often opposed to any regulation that would keep fertilizer from agricultural run-off from entering the Mississippi River and adding to eutrophication not only in the offshore “dead zone” but in the areas receiving diverted freshwater from coastal restoration projects. The Mid-West needs to be reminded that the Mid-west needs the Port of New Orleans to export its grain. At the same time, the Corps appears to be unable to reconcile its activities in restraining suspended sediment behind dams upriver from Louisiana, with attempting to achieve maximum beneficial effects from sediment loads in sediment diversion projects further downstream in Louisiana. These situations present cognitive dissonance as to Louisiana’s coastal issues.

Accordingly, it might be advisable for the State to consider spending some of the currently available funds associated with the BP Settlement and/or other sources for a major informational and educational effort aimed toward informing the rest of the country how it is in the best interests of the country to focus on saving this invaluable resource that is Louisiana. This position could be presented from any number of perspectives, but particularly from commercial, economical and energy standpoints, not to mention those associated with eco-tourism and the ecosystems themselves. Sadly, at present, our country appears distracted by various informational campaigns associated with exaggerated threats related to enemies abroad and domestic terrorism. Perhaps it is time for the State to launch an informational campaign at the same level to address a real threat: a threat literally to our own shores and their very existence, albeit a natural one.

### 3. “Changing Course”

In the Master Plan, a reference is made to a potential initiative to develop a new Delta within the existing Mississippi River. In fact, a competition was apparently held toward isolating the optimum strategy in this regard. This approach would seem to make sense, as if projects are going to be implemented in accordance with the glacial pace recently projected by the Corps, it may be necessary to pursue a much more radical approach toward coastal restoration. This is because many of the contemplated projects may simply be “too little, too late” in the larger picture.

Under these circumstances, the State may want to consider placing this strategy at a higher level of importance and on a “fast track.” This is particularly so since many of the contemplated projects associated with the Master Plan may be rendered obsolete simply due to the passage of time.

Once again, this is to thank you for the opportunity to comment on this draft Master Plan which is being issued at a critical time in Louisiana’s natural and anthropogenic history.

With kind regards, I am

Sincerely,  
Andrew C. Wilson

**Attachments:**

<b>Public Comment Entry #:</b> 114
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<b>City:</b> Baton Rouge
<b>State:</b> LA
<b>Content:</b> Comments: Appendix E - Attachment E1 - 5.2 Building Codes & 5.2.1 Infrastructure and Building Standards Recommendations
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/f13a21b0-f4cb-0134-1ae7-6abd80a12d20/CPRAComments.SH.docx">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/f13a21b0-f4cb-0134-1ae7-6abd80a12d20/CPRAComments.SH.docx</a>

## 5.2 Building Codes

The latest edition of the American Society of Civil Engineer's Flood-Resistant Design and Construction Standard (ASCE 24-14) sets forth important standards to decrease buildings' vulnerability to flood risk. ASCE-24 provides minimum requirements for the siting, design, and construction of buildings in flood hazard areas subject to building code requirements. These standards apply to a wide range of building types including commercial, residential, industrial, educational, healthcare, critical facilities, and others. ASCE-24 is a referenced standard in the I-Codes, and buildings and structures within the scope of IBC and proposed to be located in any flood hazard area must be designed in accordance with it.

Additionally, FEMA requires that Hazard Mitigation Assistance (HMA) applicants and subapplicants design and construct all projects located in the flood hazard areas in conformance with ASCE/SEI 24-14, or latest edition, as a minimum standard, or the Applicant's equivalent minimum design standard.

ASCE-24-14 flood standards are defined according to a structure's Flood Design Class which is based on building type, occupancy, and location in FIRM flood zone. For instance, single-family residential and small commercial structures are Class 2 and must be elevated to the BFE +1 foot or Local Design Flood Elevation (DFE) (whichever is higher); Class 4 structures such as hospitals, emergency shelters, critical facilities, etc. must be elevated to the BFE +2 feet, local DFE, or 500-year flood elevation (whichever is higher).

In addition to having robust building codes it is also important to enforce the codes with uniformity and regularity. After Hurricane Katrina, GOHSEP obtained \$10.5 million in federal hazard mitigation grant funds to develop better local capacity to enforce building codes. The resulting program, administered by the Department of Public Safety and LSUCCC, offers training, education, technical support, and direct funding for regional code offices working in a number of parishes (FEMA, 2013a). Such activities are a model for other jurisdictions and state and local agencies need to continue to build capacity to enforce local building codes across the coast.

It is recommended that LSUCCC and local parishes continue to adopt updated standards and, based on the potential for increasing risk, consider new higher ordinances or regulations above the minimum requirements. The LSUCCC and local parishes must maintain minimum disaster related provisions of the adopted model code, including freeboard provisions for the most current versions of the International Building Code and International Residential Code when updating the building code. Adopting higher regulatory standards such as increased freeboard, additional levels of protection for structures behind levees, or cumulative substantial damage tracking requirements must be strongly considered.

### 5.2.1 Infrastructure and Building Standards Recommendations

Uniform Construction Code Council:

- Increase resilience of building stock by updating building standards for high risk structures in the floodplain and continuing to provide resources for local implementation and enforcement of LSUCC standards.
  - Create state wide standard process for building code enforcement.
  - Update building code standards to promote flood damage reduction by adopting the 2015 IRC and IBC, and prevent the weakening of the code by deleting the statewide freeboard requirement.
  - Update building code standards to promote storm damage reduction including high-wind design requirements in the 2015 IRC.

Parish and Municipal Governments:

- Increase resilience of building stock by strengthening building standards for high risk structures in the floodplain in accordance with ASCE-24-14, and increase enforcement of these standards.
- Residential and Commercial Development:
  - Encourage new construction that prioritizes disaster resilient design - focusing on flood protection height, wind resistance, and green infrastructure that will ensure the sustainability of the community and tax base.
  - Development, land use, and drainage projects should be considered on watershed basis verses parish or community boundaries.
  - Require more stringent development standards for new construction that require a Flood Insurance Study for neighborhoods under 50 structures and 5 acres or less.
  - Subdivisions in the Special Flood Hazard Area should discourage imported fill to meet the base flood elevation, as it could change the surrounding hydrology and adversely affect existing building stock.
  - Participate in mutual aid emergency response programs, such as EMAC/IMAC, to help communities and residents recover more quickly post-disaster.

<b>Public Comment Entry #:</b> 113
<b>First Name:</b> Jennifer
<b>Last Name:</b> Coulson
<b>City:</b> Pearl River
<b>State:</b> LA
<b>Content:</b> Please see the attached letter of comment.
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/30a135e0-f4c7-0134-30d5-6abd80a12d20/OAS_2017_Master_Plan_Comments.pdf">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/30a135e0-f4c7-0134-30d5-6abd80a12d20/OAS_2017_Master_Plan_Comments.pdf</a>



64340 Fogg Lane

Pearl River, LA 70452-5206

OrleansAudubon@aol.com

26 March 2017

Mr. Johnny Bradberry, Chairman  
Coastal Protection and Restoration Authority of Louisiana  
Governor's Executive Assistant for Coastal Activities  
Capitol Annex Building, Suite 138  
Baton Rouge, LA 70802

Re: 2017 Draft "Louisiana's Comprehensive Master Plan for a Sustainable Coast"

Dear Mr. Bradberry:

The Orleans Audubon Society considers the 2017 Draft "Louisiana's Comprehensive Master Plan for a Sustainable Coast" to be of vital importance to Louisiana's birds, other wildlife and humans. We applaud the efforts of the Coastal Protection and Restoration Authority and its many partners in developing this comprehensive and ambitious plan to combat coastal land loss and provide enhanced flood protection to Louisiana's citizens.

As a general, overarching comment, we encourage the state to take a much more aggressive approach toward using sediment diversion in its coastal marsh restoration projects. The sediment in the Mississippi and Atchafalaya rivers has the power to build land and the Draft 2017 Plan is underutilizing this natural resource. Louisiana needs more large-scale sediment diversion projects.

A main criticism is that many proposed levees and other flood control structures will negatively impact the environment, yet the Draft 2017 Plan does not describe how these impacts will be mitigated. For example, the Pontchartrain Barrier, Morganza to the Gulf and the Upper Barataria Risk Reduction projects will jeopardize important estuaries. The Plan needs to propose ways to build barriers that facilitate or mimic these natural processes via gates, diversions, etc., while still protecting people and homes.

We hope that the following projects nearing implementation will be fast-tracked as high priorities: East Maurepas Basin, Mid-Barataria and Mid-Breton sediment diversions and the plan to increase the Atchafalaya's flow to Terrebonne (03b.DI.04). The Maurepas Basin's state of deterioration is a matter of extreme urgency: without rapid intervention, the entire area is likely to convert to open water in the near future. In addition, we would like to see the Plan include restoration projects for the western Barataria Basin and parts of eastern Terrebonne Basin that at present seem to be neglected.

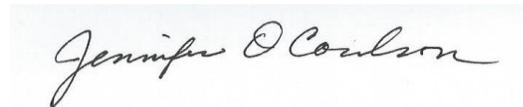
We would like to offer comments about several coastal restoration needs in southwest Louisiana. The 2017 Draft Plan does not adequately address the extreme rate of coastal land loss in Cameron Parish, especially the Rockefeller Wildlife Refuge's coastline. We recommend adding shoreline protection for this area. The 2012 Plan included restoration of the coastal chenier ridges in southwest Louisiana, and we recommend that this project be carried over into the 2017 Plan. These cheniers, heavily damaged by Hurricane Rita, are in desperate need of reforestation. Coastal cheniers provide natural protection for interior marshes and are incredibly important habitat for neotropical migratory songbirds. The proposed project to decrease salt water intrusion by adding salinity control measures on the Calcasieu Ship Channel is much needed.

Hopefully the state is developing a long-term plan to educate the taxpayers nationwide and Congress about the importance of investing in coastal restoration and flood protection now and over the next 50 years.

From the perspectives of both planning and fund-raising, it would be prudent to develop comprehensive partnerships with the coastal states we share borders with, Texas and Mississippi. Once these partnerships are established, Louisiana needs to consider the Sabine and Pearl rivers as sources for diversions.

Thank you for continuing to involve the public in the development of "Louisiana's Comprehensive Master Plan for a Sustainable Coast" and thank you for this opportunity to provide comments.

Respectfully Submitted,

A handwritten signature in black ink that reads "Jennifer O. Coulson". The signature is written in a cursive style and is positioned above a light blue rectangular background.

Jennifer O. Coulson, Ph.D.

President and Conservation Chair

<b>Public Comment Entry #:</b> 112
<b>First Name:</b> Brandon
<b>Last Name:</b> Champagne
<b>City:</b> Youngsville
<b>State:</b> LA
<p><b>Content:</b> Projects</p> <p>Overall, I found the projects to be well defined and thought out. I liked seeing the integration of project types in order to maximize natural land-building effects. However, I also believe that there needs to be a push for local/regional projects that, although they may not build enough land to be considered in the master plan, still sustains marsh in critical areas of the coast. I think there needs to be a more collaborative effort between CPRA and similar agencies towards these smaller projects, by means of creating a separate entity to manage them or by creating regional offices that can plan small-scale hydrologic restoration or hard stabilization projects. Investing in these local projects is critical to the “Multiple Lines of Defense” strategy. Additionally, these smaller projects will presumably take less time to acquire permits and construct, making them both economical and immediate. I believe this “marsh-by-marsh” approach is essential for efficiency in both coastal restoration and hurricane response.</p> <p>As far as the projects listed in the plan, the most important ones I would like to see soon are the Mid-Barataria and Breton Sound diversions. It’s unacceptable that these projects may have to wait a decade to become operational. Additionally, I’d like to see the increased flow of the Atchafalaya River into Terrebonne Bay. In order to maximize the effectiveness of these projects, I also believe that dam removal projects further up the Mississippi River can significantly increase the land-building potential of any proposed sediment diversion. It’s up to federal and state agencies to get the ball going on these projects and realize their potential now rather than later.</p> <p>Science</p> <p>The scientific advancements, particularly in coastal modelling, has advanced the credibility of the projects advocated in the master plan. Although they can never be perfect, it’s clear that the models used in this draft master plan are more inclusive and integrated among various parameters. My only comment is that perhaps, along with updating the master plan every five years, the CPRA should also publish a “technical report” for all of the researchers dedicated to pure coastal research. In order to make their scientific contributions even more valid, I believe it’s important for the researchers involved to make a consensus on all aspects of their research, whether it be modelling or experimentation. Because the fields of research included in this master plan are so diverse, it’s important to make sure that the advancements in scientific capabilities are communicated concisely and that all researchers in a research topic are on the same page. The standardization of these methods and analyses is important for researchers and managers to accurately predict and plan for future conditions.</p> <p>Community Outreach</p>

My biggest caveat towards this very well-written, well-presented document is the lack of committed, genuine outreach. Being from the bayous of Louisiana, it's clear to me how important it is that the State of Louisiana be fully committed to the protection and restoration of coastal Louisiana. With the loss of homes, the loss of marsh, and the loss of generations of fishing opportunities, the culture of Louisiana is at risk of being lost. Being on the same page is extremely important, and I believe that hearing and learning from each other is crucial. Cajun fisherman have years of firsthand experience in the marsh. Since the most fundamental part of research is observation, utilizing these experiences as observations can ignite new research ideas and possibly lead to new, bolder solutions. Information is critical for these projects, and the best way to fuel and sustain these new ideas is to utilize Louisiana's most overlooked resource; its people.

One institution that has thoroughly impressed me with its capacity to reach out to these communities is the Water Institute of the Gulf, specifically the People, Resources, and Technology Division. There, researchers are constantly reaching out to the communities in small, specific ways. They may ask coastal residents to mark land loss on a map or circle the most vulnerable structures in their community. Modeling The Water Institute's approach would be beneficial for not only the research being conducted on the coast, but would also create a more inclusive environment where everyone feels welcome to the table. Seminars and lectures being presented by the CPRA and similar agencies are helpful, but not enough to make everyone feel included in the decision making process. In order for that to happen, coastal residents need to be engaged with the design process and feel like their contributions are important to the future of our coast. Accomplishing this task is enormous, but hopefully some creative solutions by the CPRA team will help put the needs of the communities back into perspective.

Another institution that has directly helped these communities is the Louisiana Sea Grant program. However, because of projected budget cuts, it is possible that this program could be forced to close in the near future. I firmly believe that this institution is a key link between these communities, their state government, and the collegiate research being conducted around the state. With this said, the Sea Grant program needs to find a way to remain in operations, despite the cost.

**Attachments:**

<b>Public Comment Entry #:</b> 111
<b>First Name:</b> Monique
<b>Last Name:</b> Verdin
<b>City:</b> Saint Bernard
<b>State:</b> None
<p><b>Content:</b></p> <p>I am a citizen of the United Houma Nation and a resident of eastern St. Bernard Parish. I sit on the Tribal Council for the United Houma Nation representing District 7, encompassing St. Bernard and Plaquemines Parishes, as well as the town of Gretna. It is with great concern that our Houma Nation is threatened with unprecedented land loss and sea-level rise, especially given the fact that most of our tribal communities lie in coastal communities at the ends of the bayous from the Atchafalaya River to the state of Mississippi.</p> <ul style="list-style-type: none"> <li>• The 2017 Coastal Master Plan does not mention anything about the closing of oil and gas canals across the coast. We know the detriment these canals cause of the landscape and it is crucial for the master plan to include the closing of these canals in order to restore the wetlands in a responsible way.</li> <li>• Many sacred cultural and heritage sites, such as indian mounds as well as cemeteries in addition to important fishing communities, are found across southeast Louisiana. The protection of these sites should be prioritized and a metric should be included equal to "working coast" or "navigation". Strategies should consider how best to restore wetlands and protect significant locations.</li> <li>• More clarification needs to be included in the next iteration of the Master Plan regarding how communities eligible for "Nonstructural" projects get prioritized? What are the consequences of participating (or not) in relocation, flood proofing business, or elevating homes?</li> </ul> <p>Thank you for your time and consideration, Monique Verdin</p>
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 110
<b>First Name:</b> John
<b>Last Name:</b> Bourdeau
<b>City:</b> Denton
<b>State:</b> TX
<b>Content:</b> 5.2.1 Infrastructure and Building Standards Recommendations
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/3d125390-f4c3-0134-d927-6abd80a12d20/CPRAComments_JB.docx">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/3d125390-f4c3-0134-d927-6abd80a12d20/CPRAComments_JB.docx</a>

### 5.2.1 Infrastructure and Building Standards Recommendations

Below are CPRA's recommendations to stakeholders for incorporating flood risk reduction principles into the enhancement of infrastructure and building standards:

DOTD:

- Integrate transportation modeling and planning with parish land use planning to align state and local infrastructure investments.
  - Incorporate projected future environmental conditions and climate change including sea level rise, subsidence, land loss, flood risk, and their potential impacts on communities in DOTD's transportation modeling and planning process when evaluating the cost benefit of infrastructure projects.
  - Utilize, to the best extent possible the projections of sea level rise, subsidence, land loss, flood risk, and their potential impacts on communities in DOTD's transportation modeling and planning process when evaluating the cost benefit of infrastructure projects.
  - Utilize, to the best extent possible, the projections of sea level rise, subsidence, land loss, and flood risk developed in support of the 2017 Coastal Master Plan to create a unified and state wide approach to hazard identification and mitigation.

DOTD and Department of Public Service:

- Consider climate change impacts in the planning, design, and cost of infrastructure improvements projects (including roadways, water, wastewater, and utility systems).
  - Incorporate projected future environmental conditions and climate change including sea level rise, subsidence, land loss, and increasing flood risk when conducting cost benefit/cost-effectiveness analysis including impacts on operating and maintenance costs in all DOTD activities.
  - Consider measures to make infrastructure more resilient to flood risk including installing generators at all critical facilities and elevating roads with a history of flooding where possible.

Uniform Construction Code Council:

- Increase resilience of building stock by updating building standards for high risk structures in the floodplain and continuing to provide resources for local implementation and enforcement of LSUCC standards.
  - Create state wide standard process for building code enforcement.
  - Update building code standards to promote flood damage reduction by adopting ASCE-24-14 into the 2015 IRC
  - **Prevent the weakening of the code by deleting higher standards, such as freeboard.**
  - Update building code standards to promote storm damage reduction including high-wind design requirements in the 2015 IRC.

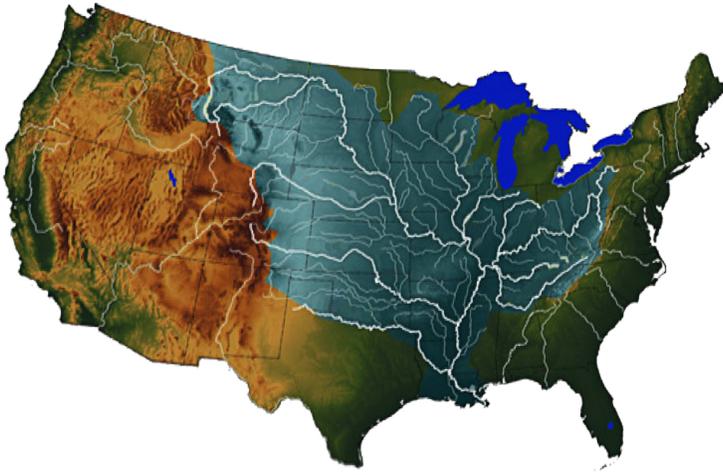
- Maintain minimum disaster related provisions of the adopted model code and adopt higher regulatory standards such as increased freeboard, additional levels of protection for structures behind levees, or cumulative substantial damage tracking requirements.

Parish and Municipal Governments:

- Increase resilience of building stock by strengthening building standards for high risk structures in the floodplain in accordance with ASCE-24-14, and increase enforcement of these standards.
  - Avoid building slab-on-grade residential homes that require imported fill in flood prone areas. Instead use open, pier and beam foundations that will not adversely impact neighboring structures or communities downstream.

<b>Public Comment Entry #:</b> 109
<b>First Name:</b> Tommy
<b>Last Name:</b> LeJeune
<b>City:</b> Gueydan
<b>State:</b> LA
<b>Content:</b> We need better drainage on Talens Landing Road.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 108
<b>First Name:</b> Sean
<b>Last Name:</b> Duffy, Sr.
<b>City:</b> Metairie
<b>State:</b> LA
<b>Content:</b> Please accept the attached as the official comments from the Big River Coalition on the State of Louisiana's Draft Master Plan for 2017.
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/86d3c380-f4bc-0134-30d5-6abd80a12d20/Comments_on_Louisiana_s_Comprehensive_Master_Plan_for_a_Sustainable_Coast_2017_Draft_.pdf">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/86d3c380-f4bc-0134-30d5-6abd80a12d20/Comments_on_Louisiana_s_Comprehensive_Master_Plan_for_a_Sustainable_Coast_2017_Draft_.pdf</a>



Sean M. Duffy, Sr.  
Executive Director  
4741 Utica Street, Suite 200  
Metairie, LA 70006

Office (504) 833-4190 x 805  
Cellular (504) 338-3165

March 26, 2017

## Comments on Louisiana's Comprehensive Master Plan for a Sustainable Coast 2017

Mr. Johnny Bradberry  
P.O. Box 94004  
Baton Rouge, LA  
70804-9004

Mr. Bradberry,

The Big River Coalition (BRC) was created in Fiscal Year 2011 in response to the announcement by the Commander of the United States Army Corps of Engineers' (USACE) Mississippi Valley Division that confirmed the discontinuation of reprogramming funds to maintain the Mississippi River Ship Channel Gulf to Baton Rouge (Louisiana). This position change immediately meant the Mississippi River Ship Channel would no longer receive preferential treatment. Shortly after the 1989 grounding of the M/V MARSHAL KONYEV (Pilottown) that, in essence, closed the Ship Channel to all traffic, the USACE's Headquarters announced in a position statement that it would maintain the nation's most critical navigation channel. The BRC's originally focused on obtaining additional funding to supplement the shortfall in the Corps' Operations and Maintenance budget, to strive to establish a legislative firewall around the Harbor Maintenance Trust Fund and to represent members of the Mississippi River navigation industry in matters related to coastal restoration. As our membership grew and continued to make effective progress on these initiatives, members supported the Coalition's commitment to actively advocate for the deepening of the Mississippi River Ship Channel Gulf to Baton Rouge to 50 feet.

The Coalition strives to maximize the economic efficiencies that promote increased maritime commerce and international trade. The Lower Mississippi River Deep-Draft Ports Complex (Baton Rouge, South Louisiana, New Orleans, St. Bernard, and Plaquemines) is a powerhouse in international trade and the nation's busiest port system. The cargoes moved through these five ports account for nearly 70 percent of the Nation's grain exports and more than 20 percent of the Nation's coal and petroleum cargoes.

The Coalition has also worked with the Corps to increase the beneficial use of dredge material in the extreme lower river (below Venice), through the utilization of cutterhead dredges as part of the Corps channel maintenance program. The Corps with the assistance of navigation industry leaders began utilizing cutterhead dredges in the area of Southwest Pass in 2009. This effort has created nearly 6,000 acres of new land in this environmentally sensitive bird's-foot delta by removing sediment from the navigation channel and beneficially utilizing it along the channel edges. The newly created land or wetlands conversely protect the critical navigation channel from storm surge and/or thalweg capture and has received recognition from state and federal government partners for the benefits of creating land in this delicate deltaic region. The Coalition would like to ensure that future land loss modeling efforts accurately

account for the increased acreage and acknowledge that additional acreage will continue to be added on an annual basis.

<b>Fiscal Year</b>	<b>Southwest Pass</b>	<b>Hopper Dredge Disposal Area</b>
<b>2009</b>	<b>100 Acres</b>	
<b>2010</b>	<b>67Acres</b>	<b>466 Acres</b>
<b>2011</b>	<b>199 Acres</b>	<b>70 Acres</b>
<b>2012</b>	<b>615 Acres</b>	<b>0 Acres</b>
<b>2013</b>	<b>612 Acres</b>	<b>851 Acres</b>
<b>2014</b>	<b>572 Acres</b>	<b>None (Combined for FY 15)</b>
<b>2015</b>	<b>364 Acres</b>	<b>667 Acres</b>
<b>2016</b>	<b>768 Acres</b>	<b>4 Acres</b>
<b>2017</b>	<b>Ongoing</b>	<b>570 Acres Plus</b>
<b>TOTAL</b>	<b>3,297 ACRES</b>	<b>2,628 ACRES</b>

As you will recall the CPRA also recognized these beneficial use efforts by finding them “complimentary to or consistent with” the State’s Master Plan in a letter dated March 4, 2016 and signed by you as the Chairman of the CPRA Board. The navigation industry and river pilot associations are proud of this project. We are also dedicated to and driven by necessity to increase not only the amount of material beneficially used, but to expand areas where beneficial use can be done. Most notably on the Deep Draft Crossings between New Orleans and Baton Rouge.

The Coalition is hopeful that the CPRA will honor the quote below from the Draft Master Plan for 2017 and work with the navigation industry to develop methods to effectively help remove more sediment from the channel and beneficially use it near the areas where navigational channel maintenance dredging occurs, i.e. the area of Southwest Pass and on the Deep Draft Crossings.

“As the state implements the large-scale marsh creation projects laid out in the master plan, it is imperative that we use the sediment from all applicable dredging activities.”

The economic impact of the Lower Mississippi River Deep-Draft Ports Complex is nationally significant. Louisiana industries dedicated to national and global trade account for 396,300 jobs and \$19.5 billion in earnings. More than 170,000 of these Louisiana jobs are solely dependent upon international trade. Louisiana exports have doubled from \$32 billion in 2009 to more than \$65 billion in 2014. The exports handled by the Lower Mississippi Deep-Draft Ports Complex have increased an astounding 227 percent in the past decade. In fact, 25 percent of Louisiana’s Gross Domestic Product is derived from exports, the largest amount ever recorded for any single state in the United States. Louisiana ports carry over 25% of the country’s waterborne trade. Regardless of the metric, Louisiana’s economy depends upon robust international trade.

As reproduced from the Draft Master Plan for 2017:

“In 2010, seven independent researchers examined the coast’s provision of ecosystem services. Their report stated that the Mississippi River Delta provides at least \$12 to \$47 billion in benefits to people each year. If this natural capital were treated like an economic asset, its total economic benefit to the nation would be \$330 billion to \$1.3 trillion per year. Over a 100-year period, the value of the coast’s ecological services alone would be between \$237 billion and \$4.7 trillion. The researchers note that many data gaps remain in our understanding of what the coast provides. As we learn more, our appreciation of the coast’s value will likely increase significantly.”

# BIG RIVER COALITION

The Big River Coalition desires to work directly with the CPRA to increase the beneficial use of dredged material when performing maintenance dredging on the Mississippi River Ship Channel (MRSC). The Coalition believes the deepening of the MRSC to 50 feet will provide an excellent opportunity to increase the amount of beneficial use of dredged material. The draft General Reevaluation Report on the MRSC deepening project predicts that lowering the navigation channel to 50 feet would create nearly 1,500 acres through beneficially use in the environmentally sensitive bird's-foot delta.

Sincerely,

*Sean M. Duffy, Sr.*

Sean M. Duffy, Sr.  
Executive Director

<b>Public Comment Entry #:</b> 107
<b>First Name:</b> Kim
<b>Last Name:</b> Nehrbass
<b>City:</b> Lafayette
<b>State:</b> LA
<b>Content:</b> I laud your efforts to save our coast. I would like to see more emphasis on saving the frontline such as rock barriers that allow sediment to collect behind them. I realize that this may be futile long term with subsidence and rising water levels but it will extend the life for a while at least. Thanks!
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 105
<b>First Name:</b> Kelly
<b>Last Name:</b> Thomason
<b>City:</b> Luling
<b>State:</b> LA
<b>Content:</b> We support the Coastal Master Plan as detailed in the attached letter.
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/8b64fa80-f4a0-0134-d927-6abd80a12d20/Monsanto_Letter_of_Support_-_Coastal_Master_Plan_.docx">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/8b64fa80-f4a0-0134-d927-6abd80a12d20/Monsanto Letter of Support - Coastal Master Plan .docx</a>

March 29, 2017

The Coastal Protection and Restoration Authority  
P.O. Box 44027  
Baton Rouge, LA 70804

Re: Draft 2017 Coastal Master Plan Comments

Dear Mr. Bradberry:

Monsanto is in support of the Draft 2017 Coastal Master Plan. Protecting and conserving Louisiana's diminishing coast is vital to the future of our company, our employees, and our way of life.

Specifically, the following structural flood protection projects included in the plan have our full support:

- West Shore Lake Pontchartrain – 001.HP.05
- Upper Barataria Risk Reduction – 002.HP.06
- Greater New Orleans High Level – 001.HP.04

These projects provide flood protection to our facility, located at 12501 River Road, Luling, LA, 70070, as well as our hundreds of employees that support our facility and live inside the protection areas. We applaud CPRA's efforts in preparing the plan and find it to be an instrumental proposal that aims to make coastal restoration and flood protection a reality in Louisiana.

If you have any questions about please feel free to contact Kelly Thomason, Monsanto Business Unit Leader, at (985) 785-3524.

Sincerely,

Kelly Thomason  
Business Unit Leader  
Monsanto Company

<b>Public Comment Entry #:</b> 103
<b>First Name:</b> Stephen
<b>Last Name:</b> Deep
<b>City:</b> Slidell
<b>State:</b> LA
<b>Content:</b> I live in Eden Isles outside of Slidell, LA.  I am concerned that current planning does not adequately address property concerns in my neighborhood.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 102
<b>First Name:</b> Libby
<b>Last Name:</b> Nehrbass
<b>City:</b> Lafayette
<b>State:</b> LA
<b>Content:</b> I attended the CRCL Coastal Road Show in Abbeville where I got a thorough introduction to the 2017 Master Plan for a Sustainable Coast. Though I am not qualified to argue in favor or against specific projects within the plan, I am able to share my enthusiasm for the quality of thought and conversation that went into the development of that plan. I whole-heartedly support the adoption of the plan next month.  Our coastline must be our first priority in our conversations about our state's future, and we must learn to consider our precious coast and nature itself as the most critical components of our "infrastructure", since without a clear knowledge and respect for the underlying systems and processes which sustain them, we might as well build our hopes for a prosperous future (or any future at all) on clouds.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 101
<b>First Name:</b> Timothy
<b>Last Name:</b> Saucier
<b>City:</b> Gheens
<b>State:</b> LA
<b>Content:</b> I am very displeased on the new coastal protection project. I live in the Gheens community and left out the protection. I pay taxes like everyone else. My property value will drop and my insurance will go up. Who will be held responsible for my loses. This is not fair for everyone in our community.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 100
<b>First Name:</b> Logan
<b>Last Name:</b> Burke
<b>City:</b> New Orleans
<b>State:</b> LA
<b>Content:</b> Please see attached comments.
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/517beb80-f45d-0134-d927-6abd80a12d20/CPRA2017AAE.docx">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/517beb80-f45d-0134-d927-6abd80a12d20/CPRA2017AAE.docx</a>

**Comments from the Alliance for Affordable Energy****March 26, 2017**

We appreciate the opportunity to submit these comments. The Alliance for Affordable Energy is a Louisiana non-profit with the mission of consumer and environmental protection related to energy matters. There is no doubt our coastal crisis is related to our history as an “energy state.” With these comments, we recommend the state’s very survival depends on a move toward being a “clean energy state.” Solutions exist, but in order to preserve our state and spend both state and federal money to do so, we must acknowledge, mitigate, and adapt to the causes of our crisis.

**THE CAUSE**

Louisiana’s rapidly disappearing coast is an existential crisis. Either we will find a way to stem the tide of land loss in the next generation, or we will be forced to drastically realign the physical, cultural, and economic landscape of our state. Louisiana’s Coastal Master Plan represents an ambitious effort to adapt and meet the challenges ahead. It is rightly praised for being developed with world-class science and adapting to new information. Unlike the 2012 plan developed under Gov. Jindal, for example, the 2017 Draft uses the term “climate change” to describe the problem.

There is, however, a glaring omission. If the plan were truly based on best-available science, it would not only mention climate change but also point out that man-made carbon emissions are a leading driver of climate change and its impacts, including coastal land loss. As it stands, the Draft 2017 Coastal Master Plan uses science to treat the symptoms of climate change while largely ignoring the causes and solutions.

Louisiana’s coast is disappearing due to a combination of factors such as subsidence, sea level rise, and saltwater intrusion. Louisiana plans to spend \$50 billion on the Coastal Master Plan, though in reality the costs are likely to be much higher. At the same time, utility customers are paying to build and maintain fossil fuel power plants. The best available science tells us that those power plants contribute to the very same sea level rise that we’re paying to adapt to. We’re drilling holes in our own life boat, and we’re paying for both sides.

People will point out that global warming is, too large a problem, that Louisiana alone cannot do enough to reduce emissions. But that doesn’t mean we should be hastening our own demise. While sea-level rise poses problems for coastal areas around the world, South Louisiana is one of the most vulnerable spots on

the planet. The technology to phase out fossil fuel exists, it's affordable, and it creates jobs.

CPRA should acknowledge the link between sea level rise, climate change, and carbon emissions and urge other state actors to consider this link in their decision making. The Plan should send the signal that we are truly committed to letting the science shape the policy, not the other way around. Practically, it will give us a better shot at protecting and restoring our coast, and we need all the help we can get.

### **THE SOLUTIONS**

Despite so much at stake, Louisiana's new 2017 Plan is silent on the success of renewable energy and energy efficiency programs that are already having clear success in New Orleans and many other parts of the state. Energy efficiency programs reduce power plant emissions that can help prevent the worst-case sea-level rise from coming to pass.

Just as the Plan includes non-structural adaptation solutions including elevating buildings in vulnerable communities, it should propose mitigation solutions like expanding ambitious efficiency programs statewide. Last year in New Orleans, for every dollar spent - customers reaped \$1.90 in cost savings. These cost savings are distinct from the billions the state could save from emissions reductions and their long-term costs.

Louisiana's actions - including the promotion of energy efficiency and clean energy - not only contribute to the solution...they are a critical display of leadership that the rest of the nation must see to believe that they too must do their part. A failure to act, sends a signal to others that action is not needed and that loss of Louisiana's coast is not important enough for us, so why should it be to them?

Louisiana's Coastal Protection Plan should set out a vision for tackling the problem on all fronts. It should demonstrate at home the policies and actions other cities and states should follow., particularly in the areas of clean energy alternatives to reduce the likelihood of the worst case scenario.

Gov. Edwards recently said:

"Before we can ever have any hope of asking taxpayers around the country to come to Louisiana and help us restore our coast, we have to be able to show them that we did everything that we could, reasonably, that is within our power."

While carbon and methane emissions are a leading driver of our coastal land

loss predicament, the Coastal Master Plan as currently written largely overlooks this fact, but it not entirely silent on the matter...hidden in Appendix C2, it states the key determinant of sea level rise is atmospheric concentrations of heat-trapping carbon pollution. — And there you have it — reducing carbon pollution today will reduce the likelihood of the worst-case, high sea-level rise scenario which in turn would cost billions of dollars more in expensive engineers fixes to problems we should aim to prevent. Like health care - an ounce of prevention is worth a pound of cure. Let's do our part today to keep Louisiana environmentally and economically healthy and save ourselves a trip to the emergency room for failing to act on a still preventable catastrophe.

It's dollars and sense, let's do the right thing with energy efficiency and renewable energy - and let's do it now, otherwise climate science suggests we will simply be throwing billions of dollars and our state into the Gulf of Mexico.

Thank you for the opportunity to offer our thoughts on the 2017 Louisiana Coastal Master Plan.

Logan A. Burke

Executive Director

Alliance for Affordable Energy

<b>Public Comment Entry #:</b> 99
<b>First Name:</b> Curtis
<b>Last Name:</b> Carrington
<b>City:</b> Geismar
<b>State:</b> LA
<b>Content:</b> Please see the attached document for submitted comments in regards to the 2017 Coastal Master Plan
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/51494500-f45b-0134-1ae7-6abd80a12d20/LA_Coastal_Master_Plan_Comments_Final.docx">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/51494500-f45b-0134-1ae7-6abd80a12d20/LA_Coastal_Master_Plan_Comments_Final.docx</a>

The Coastal Protection and Restoration Authority,

The Louisiana Coastal Plan will have an affect on all organization and companies represented in the proposed areas for project construction. The plan seems to have very important projects that are needed for the development and safety of our coast and Enterprise Products (EPD) is willing to take a front seat when it comes to development and planning to stay informed on how these projects not only affect us and surrounding companies, but allow for the safest and most effect projects that help save the LA coast.

Enterprise Products has viewed the proposed coastal plan and provides the following comments:

- EPD has critical infrastructure around the St. Mary and Vermillion parishes. Projects that will work to fortify the coast around the Neptune, Calumet and Sea Robin areas would be beneficial.
- Current infrastructure at Sorrento sites is already flooding periodically due to normal weather and land reconstruction or a levee around the surface assets would not only benefit EPD but also other major stakeholders along the coast like Exxon and Shell.
- The EPD Toca-Norco NGL line will remain in service. The Barataria basin projects will help maintain cover for our pipe.
- The Coastal Master Plan needs to address the intracoastal waterway and its effect on all shoreline entities south of it due to spoils deposition and watershed diversion.

The few points mentioned above are insight to projects along the Louisiana coast that EPD has dedicated much time and energy into. As part of the planning of these projects and future endeavors , we must take into the account the future projects of the LA Coastal plan as well. To save time, resources, and control finances, it is critical that as the LA Coastal plan moves forward, stakeholders along the coast are informed early on during the beginning phases of the various project initiatives (like planning and design).

Enterprise is looking to be considered in all plans moving forward involving coastal projects.

Thank you,

Enterprise Products

<b>Public Comment Entry #:</b> 98
<b>First Name:</b> Richard
<b>Last Name:</b> Condrey
<b>City:</b> Baton Rouge
<b>State:</b> LA
<b>Content:</b> My fourth set of comments "Questioning the 2017 Draft Plan's assumptions of declining rates of land loss and subsidence" is attached as a pdf file
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/d9c6c1e0-f440-0134-3dac-76b4e0029ebf/March_26_Condrey_4_th_set_of_comments.pdf">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/d9c6c1e0-f440-0134-3dac-76b4e0029ebf/March_26_Condrey_4_th_set_of_comments.pdf</a>

March 26, 2017

Re: Questioning the 2017 Draft Plan's assumptions of declining rates of land loss and subsidence

Dear CPRA,

In my first 2017 Draft Master Plan comment to you, I noted that

... my analysis of Couvillion et al.'s (2011) data did not support the assumption of any statistically valid impact of management or hurricanes on "a constant rate of land loss in coastal Louisiana of 69.1 km<sup>2</sup>/yr (1.47 football fields/hr) for 1932 through 2010" (Condrey et al. 2014, p. 34 and Figure 8 on p. 46...

(Condrey to CPRA, March 21, 2017, second paragraph), that I had been unable to

... to derive Couvillion et al.'s (2011) "Regression trend line, 1985-2010" discussed in their Figure 5.

(Condrey to CPRA, March 21, 2017, third paragraph), and provided attachments in support of my observations and questions.

Though my first comment concerned the impact of these issues on the rates of land loss projected in CPRA (2012), my review of your 2017 Draft Master Plan (<http://coastal.la.gov/a-common-vision/2017-draft-coastal-master-plan/>) suggests that these issues also impact the rates of land loss projected in the 2014 Draft Master Plan for at least two reasons outlined below.

**First**, Couvillion et al.'s (2011) "Regression trend line, 1985-2010" with its slope of 16.6 sq mi /yr is accepted as evidence that Louisiana's rate of land loss has decline. For example, in Appendix C of the Draft 2017 Plan) we find:

Coastal Louisiana has experienced dramatic land loss since at least the 1930's ... and a current land loss rate of 16.6 square miles per year.

(Meselhe et al. 2016, page iv, [http://coastal.la.gov/wp-content/uploads/2016/04/Appendix-C\\_Chapter-1.pdf](http://coastal.la.gov/wp-content/uploads/2016/04/Appendix-C_Chapter-1.pdf)) which is later reinforced by:

Coastal Louisiana has experienced dramatic land loss since at least the 1930's (Couvillion et al. 2011) ... and a current land loss rate of 16.6 square miles per year (Couvillion et al. 2011).

As detailed in Condrey to CPRA 2017, I do not find that Couvillion et al.'s 2011 published data can be used to reproduce his published trend line slope of 16.6 sq mi /yr and that this same data support a single (undiminished) rate of land loss of 26,7 sq mi/yr (69.1 km<sup>2</sup>/yr).

The point is not minor, as it appears you are using the assumption that Louisiana's current rate of land loss has decline in constructing and evaluating your land loss projections. I hope that I am wrong as I find no statistical justification for this assumption and that its use would greatly overestimate the time Louisiana's coastal residents have to respond to land loss in the near future. I suggest that your 2017 Master Plan at least acknowledge my concerns, or resolve these issues. I will be glad to assist you in those efforts.

**Second**, in Attachment C2-2: Subsidence, I find

The 2012 Coastal Master Plan 'moderate' scenario assumed that future subsidence rates would be 20% of the identified range of subsidence rates for each region. This value was selected based on observations (e.g., Kolker et al., 2011) that report historical subsidence rates are declining and thus suggesting that subsidence over the next 50 years may be on the lower end of the range. The 'less optimistic' scenario assumed that the recent decline in subsidence rates would not continue and the subsidence rate selected for the modeling was the median value of the range in each region.

(Reed and Yuill 2016, page 1, [http://coastal.la.gov/wp-content/uploads/2016/04/Attachment\\_C2-2\\_02012017.pdf](http://coastal.la.gov/wp-content/uploads/2016/04/Attachment_C2-2_02012017.pdf) ), and

Given the lack of definitive data or studies on which to justify modifying the spatial polygon boundaries or the plausible range of subsidence rates, the recommendation is for the 2017 Coastal Master Plan modeling effort to use the same polygons and plausible ranges as the 2012 Coastal Master Plan (Figure 1, Table 1).

(Reed and Yuill 2016, page 8).

My initial review of Kolker et al. 2011 (<http://onlinelibrary.wiley.com/doi/10.1029/2011GL049458/abstract> ) suggest that a portion of their analysis is dependent upon Couvillion et al. (2011) data for Barataria Bay (i.e., their Figure 2e). While I am not familiar with their statistical procedure, I note that Couvillion et al.'s published data for Barataria Bay also appear to be consistent with a single rate of land loss when I conduct an Analysis of Covariance using SAS. This suggests to me that at least the Barataria Bay portion of Kolker et al.'s analysis is open to a different interpretation – one which would not justify an assumption of continuing declines in rates of subsidence in your 'near future' projections. I would be glad to discuss my concerns with you as also relate to a possible overestimate in the time Louisiana's coastal residents have to respond to land loss in the near future.

Yours,  
Richard Condrey  
coecnd@lsu.edu

<b>Public Comment Entry #:</b> 97
<b>First Name:</b> Richard
<b>Last Name:</b> Condrey
<b>City:</b> Baton Rouge
<b>State:</b> LA
<b>Content:</b> March 26, 2017  Re: Barrier Islands  Dear CPRA.  On August 4, 2014 I sent a series of questions (attached) to members of your team regarding my review of CEC [2012] Barrier system performance assessment: Technical memorandum 4.  The questions related to an un-going discussion we were having over the eventual construction of my Figure 9 of Condrey et al. (2014, also attached). Here my statistical analysis of the available published data on barrier island loss in coastal Louisiana from ca. 1855 to the latest available coast-wide data was inconsistent with the assumption that Louisiana's barrier island restoration efforts were working.  My recollection of the phone conversation I had with members of your team following my August 4, 2014 questions was that I was correct in my approach and concerns, as expressed in both my list of questions and my barrier island analysis in Condrey et al. (2014).  As such I surprised to find in my review of the 2017 Draft Master Plan and its appendices no references to the insightful findings of your group regarding my questions of August 4, 2014, or to my published concerns for the validity of your barrier island restoration program.  Rather if find:  The Future of Barrier Islands. Louisiana has spent hundreds of millions of dollars over the past two decades restoring its barrier shoreline and plans to continue to invest in these features. The progress we have made in recent years in restoring our barrier shorelines has allowed us to begin consideration of transitioning from a focus on construction to a focus on strategic maintenance. Unlike the 2012 Coastal Master Plan, which specified barrier island chains to be restored, the 2017 Coastal Master Plan recommends funding Louisiana's barrier island program, which CPRA is currently developing. Rather than recommending specific barrier island/  headland projects and assigning them to a certain implementation period, given the uncertainty of events like hurricanes, CPRA intends to have plans for restoration of the Terrebonne and Barataria barrier shorelines ready so that when future hurricanes do impact these areas, we can react quickly to restore the impacted barrier shoreline. This decision was informed through the 2017 modeling effort; model results indicated that, under the High Environmental Scenario, recently restored barrier islands and headlands were surviving in some manner. This informed our decision to take \$1.5 billion from our

\$25 billion restoration budget before project sequencing and set it aside to fund the barrier island program.

(Draft 2017 Master Plan, pages 85-86).

I am not comforted by a modeling effort's suggestion that "recently restored barrier islands and headlands were surviving in some manner" when the limited available published data do not support the assumption that barrier island restoration efforts are working. I do not find that this is a safe assumption for the communities which will be adversely affected if these assumptions are not correct.

I would appreciate your guidance and hope that I have made an error in failing to find a reference to the errors which our 2014 discussions found in CEC [2012] Barrier system performance assessment: Technical memorandum 4 and in our agreement over the approach and findings regarding Louisiana's barrier islands which I published in Condrey et al. (2014).

Thank you for your consideration,  
Richard Condrey  
coecnd@lsu.edu

**Attachments:**

[https://citizenreach.s3.amazonaws.com/uploads/attachment/file/27a47570-f43c-0134-bb7c-76b4e0029ebf/Condrey\\_questions\\_on\\_CEC\\_2014.docx](https://citizenreach.s3.amazonaws.com/uploads/attachment/file/27a47570-f43c-0134-bb7c-76b4e0029ebf/Condrey_questions_on_CEC_2014.docx)

August 4, 2014

Dear CPRA ,

Thank you for our phone conversation of the week of June 23, 2014, for your patience in receiving my questions on CEC [2012] *Barrier system performance assessment: Technical memorandum 4* (attached), for agreeing to forward these questions to the appropriate analyst in CEC so that we could discuss them over the phone call, and for agreeing to arrange that phone call.

My questions are:

- 1) On page 4 of CEC [2012] we find:

*The historical records of shoreline positions and change rates over time were obtained by downloading the Barrier Island Comprehensive Monitoring program (BICM) (UNO & USGS, 2009) data files from the internet at the following web address: ftp://ftp.dnr.state.la.us/bicm/. These data files (Excel spreadsheets) contained shoreline positions over time corresponding to mapped shorelines (GIS shape files) measured off of Mean High Water (MHW) transects...*

I believe that a portion of CEC's pre-2006 shoreline data referenced on page 4 was derived from Martinez et al. (2009) and McBride and Byrnes (1997). Am I correct?

- a. If not what publications provided the shoreline data for the Terrebonne Basin islands.
- b. If so, how did CEC convert the "high-water shoreline (HWL)" measurements used by Martinez et al. and McBride/Byrnes to Mean High Water (MHW), or did CEC consider HWL=MHW, despite the considerations provided in Ruggiero and List (2009, attached)?

- 2) Also on page 4 of CEC (2012) we find:

*...no comprehensive data sets presenting individual barrier shoreline land areas were found for the remainder of the barrier systems [outside of the Terrebonne Barrier System] corresponding to the time period analyzed herein [1985 -2006].*

I believe that this is a true statement as Martinez et al. (2009) and McBride and Byrnes (1997) confine their discussion to barrier islands. Am I correct?

I also believe that this statement is true for those Louisiana barrier islands not in the Terrebonne Barrier System for the period 2005 to present.

- a. Am I correct?
- b. Or are there post-2005 comprehensive barrier island land area studies for the entire Louisiana coast? If so, were these used in CPRA (2014)? If not, when will this data set be compiled and made available to the public?

- 3) Can I obtain a table listing the data (island, year, area) used to plot Figures 15 – 20 in CEC [2014, pages 22-26], or should I derive these points from the published graphs?

4) On page 21 of CED [2012] we find:

*Utilizing the USGS data from 1985 to the year of the first identified CWPPRA restoration project detailed in the first technical memorandum, Database Summary and Data Gap Analysis, pre-restoration land acreages were analyzed to derive the pre-restoration linear trend [Line X] and the projected Year of Disappearance (YOD) based upon the extrapolation of the trend line into the future until it reaches zero acres. Applying the same trend line [Line X] from the year of the most recent restoration project, a new YOD for each island was projected.*

This approach excludes 40% of the post-1984 data points from a derivation and testing of CEC's trend analysis. I do not understand how one can statistically justify applying Line X to the most recent elevation measured? Is there a statistical basis for CEC's approach? Is so, could I obtain a citation for the most authoritative article which justifies this approach?

Thanks for considering my questions. Please do not hesitate to call me at 225-769-7905 if you have any questions.

I look forward to discussing these topics with CEC (and you if you have time) over the phone in the near future. Please let me know when I can expect that phone call to occur. The present week looks good for me.

Yours,

Richard Condrey  
[coecnd@lsu.edu](mailto:coecnd@lsu.edu)  
225-789-7905

<b>Public Comment Entry #:</b> 95
<b>First Name:</b> Sherwood
<b>Last Name:</b> Gagliano
<b>City:</b> Baton Rouge
<b>State:</b> LA
<p><b>Content:</b> I am an environmental scientist and have been professionally involved in coastal restoration in Louisiana since 1969.</p> <p>In reviewing the draft 2017, coastal master plan I was very concerned to learn that the use of induced oyster reefs was not included in the plan even though it had been included in the previous master plan. This living shoreline approach has proven to be effective for protection of shoreline and banklines, creation of fishery habitat, and is an important component of restoration planning.</p> <p>The Water Institute of the Gulf and the St. Bernard Parish Coastal Restoration Advisory Committee have recommended the approach and a number of oyster reef projects have been constructed in the parish through various grants. In 2009 my firm teamed with The Nature Conservancy on a proposal for an oyster reef shoreline stabilization project that was funded through the National Oceanic and Atmospheric Administration (NOAA) under the American Recovery and Reinvestment Act on Grand Isle and along shorelines in St. Bernard Parish.</p> <p>I respectfully request that living shorelines and induced oyster reefs be included in the 2017 Coastal Restoration Plan.</p> <p>Regards, Sherwood M. Gagliano Phd CEO Coastal Environments, Inc. 1260 Main St. Baton Rouge LA, 70802 Office (225) 383-7455 Email <a href="mailto:sgagliano@coastalenv.com">sgagliano@coastalenv.com</a></p>
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 94
<b>First Name:</b> Anthony
<b>Last Name:</b> Streva
<b>City:</b> Morgan City
<b>State:</b> LA
<b>Content:</b> I am making comments on the DRAFT 2017 COASTAL MASTER PLAN.  I support using dredge material from the Atchafalaya River for marsh creation on Point Au Fer.  I support the concept of a long distance sediment pipeline from the Atchafalaya River to marsh creation sites in Eastern Terrebonne Parish.  I have concerns about the Increase Atchafalaya Flow to Terrebonne Parish diversion. I am asking for modeling and answers to a number of questions submitted by the Port of Morgan City.  I support the St. Mary Levee District's request to include the Bayou Chene Flood Protection and Diversion Project in the 2017 Master Plan.  I support the St. Mary Levee District's request to complete the Morgan City Back Levee Project in the near future.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 93
<b>First Name:</b> Kenneth
<b>Last Name:</b> Ragas
<b>City:</b> New Orleans
<b>State:</b> LA
<b>Content:</b> Please include the attached USGS Vibracore data to compare diversions versus dredging using a cost of \$6 per cubic yard.  Please respond as to your acceptance of my comments at the above email address.
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/bffa5860-f3c5-0134-7f64-76b4e0029ebf/USGS_VIBRACORE_SAMPLES.jpg">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/bffa5860-f3c5-0134-7f64-76b4e0029ebf/USGS_VIBRACORE_SAMPLES.jpg</a>

U.S. Geological Survey Data Series 344

# Archive of Sediment Data Collected from Sandy Point to Belle Pass, Louisiana, 1983 through 2000 (Vibracore Surveys: 00SCC, CR83, P86, and USACE Borehole Cores)

U.S. Geological Survey Data Series 344

By Chandra A. Dreher,<sup>1,3</sup> James G. Flocks,<sup>2</sup> Nick F. Ferina,<sup>2</sup> and Mark A. Kulp<sup>3</sup>

<sup>1</sup>Jacobs Technology Inc., St. Petersburg, FL 33701.

<sup>2</sup>U.S. Geological Survey, St. Petersburg, FL 33701.

<sup>3</sup>University of New Orleans, New Orleans, LA 70148.

[U.S. Department of the Interior](#)

[U.S. Geological Survey](#)

[Florida Integrated Science Center - Coastal and Watershed Studies](#)

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<b>Public Comment Entry #:</b> 92
<b>First Name:</b> Marc
<b>Last Name:</b> Ehrhardt
<b>City:</b> New Orleans
<b>State:</b> LA
<p><b>Content:</b></p> <p>The Grow Louisiana Coalition represents more than 22,600 Louisiana residents who support the positive impact the oil and natural gas industry has on our state.</p> <p>Throughout history, leaders from our home parishes to Baton Rouge to Congress made the decision to explore for energy to meet the priorities of the time. Louisiana answered the call in every case as Louisiana's "working coast" was born. The oil and gas industry - along with the maritime, shipbuilding, lumber and commercial fishing industries among others - grew in Louisiana because of our vast resources, our rivers and ports and our unique people.</p> <p>The oil and natural gas industry in Louisiana is the No. 1 private investor in the coast. It has been for two decades. The people of the oil and gas industry are the people of Louisiana. They live, work and raise their families across south Louisiana and in every parish of the state. The industry invests in the coast because it's our livelihood and our people depend on the coast. The industry has played an integral part in coastal restoration and supports the fundamental purpose of the Coastal Master Plan.</p> <p>In fact, a safe, productive oil and natural gas industry in Louisiana will be one of the largest sources of recurring revenue for the coast. Without a working coast and productive industry, Louisiana struggles even more to fund this Master Plan.</p> <p>Through the execution of the Coastal Master Plan, we encourage the Coastal Protection and Restoration Authority to uphold three key principles which can ensure the best work gets done and provides Louisiana with a strong working coast for generations to come.</p> <ul style="list-style-type: none"> <li>• Follow the best science available and include the highest levels of financial accountability so that resources being invested by the industry now and in the future are put to the best use.</li> <li>• Uphold the goals stated in the master plan to pursue solutions that can benefit our communities and the foundation of Louisiana's working coast that employs hundreds of thousands of working families.</li> <li>• Believe that the best science plus the best accountability equals the best future for our communities and way of life. The energy industry is the No. 1 private investor in Louisiana's coast. The best solution is working with the best science available, which the industry has, and investing our financial resources, which the industry is doing and has done for decades, into projects that can ensure both a protected coast and a working coast.</li> </ul> <p>Thank you for your consideration of our comments and the hard work invested in this plan.</p>
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 91
<b>First Name:</b> Catherine
<b>Last Name:</b> Holcomb
<b>City:</b> Morgan City
<b>State:</b> LA
<b>Content:</b> 70380 I am making comments on the DRAFT 2017 COASTAL MASTER PLAN. I support using dredge material from the Atchafalaya River for marsh creation on Point Au Fer. I support the concept of a long distance sediment pipeline from the Atchafalaya River to marsh creation sites in Eastern Terrebonne Parish. I have concerns about the Increase Atchafalaya Flow to Terrebonne Parish diversion. I am asking for modeling and answers to a number of questions submitted by the Port of Morgan City. I support the St. Mary Levee District's request to include the Bayou Chene Flood Protection and Diversion Project
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 90
<b>First Name:</b> Timothy
<b>Last Name:</b> Allen
<b>City:</b> Houma
<b>State:</b> LA
<b>Content:</b> See attached letter/map.
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/4a4574c0-f2ff-0134-f0ea-1a65b667130d/Master_Plan_Comments_-_ALM_17.pdf">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/4a4574c0-f2ff-0134-f0ea-1a65b667130d/Master_Plan_Comments_-_ALM_17.pdf</a>



Mailing Address:  
Post Office Box 206, Houma, LA 70361-0206

Deliveries Only:  
1913 LaTerre Court, Houma, LA 70363-7525

March 24, 2017

Mr. Chuck Perrodin  
Coastal Protection and Restoration Authority  
P.O. Box 44027  
Baton Rouge, Louisiana 70804

RE: 2017 Master Plan Comments

Dear Mr. Perrodin:

I commend the efforts of you and the CPRA staff in the development of the 2017 Master Plan document. The inclusion of the interactive map with the online version on the plan is especially helpful. I'll keep our comments brief, as I know you'll have a multitude of comment letters to review and ponder. The following comments are from the perspective of a large coastal landowner that has many years of experience with the coastal restoration initiative, both privately and publicly funded. Please accept our comments for the DRAFT 2017 Master Plan as follows:

- Landowner input and involvement is crucial. With the majority of the land along the coast held in private ownership, it baffles me why more credence seems to be given to folks who neither live, work or pay taxes in the area of proposed protection. The plan should speak to the fact that projects will be considered only when there are willing landowners, and expropriation will not be a tool employed to accomplish this plan.
- The plan should allow for the use of hard bankline stabilization along federal navigation channels. Though these channels were created by Federal authority, they were built with the benefit of the citizens of Louisiana in mind, and failure to hardline the banks of these channels will continue to lead to large amounts of wetland destruction, especially along the GIWW.
- The Master Plan is silent on the state's Conservation and Restoration Partnership Fund. This a worthwhile program that should be continued and addressed in the Plan. A stable though modest funding stream (\$1–2MM annually) should be maintained to allow landowners and local governments the opportunity to compete for funding to put meaningful, small scale restoration and conservation practices on the ground.
- The Mud Lake Marsh Creation (004.MC.04) project is partially on our land, and we support it, but there is an active oil and gas field within this project area for which landowners and oil and gas operators can be an invaluable wealth of information for you during project design.
- Why is the Increase Atchafalaya Flow to Terrebonne project (03b.DI.04) listed with the Southwest Coast projects? It should be included in the Central Coast projects.
- We cannot support the Mauvais Bois Ridge Restoration project (03a.RC.04); a significant portion of which is located on Apache property. This is an existing, pristine ridge which shouldn't be touched. Furthermore, we will not grant 'landrights' for this project, so it is requested that you eliminate this project from the Master Plan.

- We do, however, support a ridge feature further south which would protect the Mauvais Bois ridge. This proposed ridge restoration feature should follow the north bank of Lake DeCade and Bayou DeCade. See attached map. This proposed alternate ridge alignment has already been adopted by several CWPPRA projects (TE-28, TE-34a, TE-72 and TE-138) and privately funded restoration efforts. This suite of projects, along with TE-44, in combination with a newly created ridge feature would create a 'land bridge' in central Terrebonne while providing more benefits (and not impact pristine wetlands) like your Mauvais Bois Ridge project.
- Apache is also an affected landowner for the Bayou Pointe au Chene Ridge Restoration project (03a.RC.06) in Terrebonne. While we certainly support the concept, we are not in favor of creating adjacent, large borrow channels through vegetated wetlands in order to construct this ridge.
- Your support of the Morganza to the Gulf and HNC lock are appreciated and are absolutely essential to the sustainability of the land, culture and people of Terrebonne Parish.

In conclusion, you have much work to do to correct what we perceive as oversights of the Plan before submitting it to the legislature. We are happy to answer any questions or otherwise support your efforts to finalize and implement this Master Plan for protecting coastal Louisiana.

Sincerely,

**APACHE LOUISIANA MINERALS LLC**



Timothy J. Allen, PLS  
General Manager

encl



<b>Public Comment Entry #:</b> 89
<b>First Name:</b> Bart
<b>Last Name:</b> Haddad
<b>City:</b> Purvis
<b>State:</b> MS
<b>Content:</b> I don't see where there is any restoration planned for the Biloxi Marsh as there was in 2012? This area is world reknown for the opportunity for flyfishermen to catch bull redfish. They come from all over the world. The State will be making a grave error by not tying to protect this habitat.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 88
<b>First Name:</b> Suzanne
<b>Last Name:</b> Carlos
<b>City:</b> Houma
<b>State:</b> LA
<p><b>Content:</b> To Whom It May Concern:</p> <p>The Houma-Terrebonne Chamber of Commerce would like to thank the Coastal Protection and Restoration Authority for its past work in the Barataria and Terrebonne Basins, specifically we appreciate your commitment to the Morganza to the Gulf hurricane protection, including the Houma Navigational Canal lock complex. Our chamber has a membership of over 700 businesses and organizations that employ approximately 23,000 people living across this region, and these projects are vital to the businesses in our region and to our community.</p> <p>One of the most significant and urgent issues facing our state, as you know, is the loss of our coast. The Houma-Terrebonne Chamber of Commerce believes that Louisiana's land loss crisis requires hurricane protection and a comprehensive suite of restoration projects, including barrier islands, marsh creation, hydrologic restoration, ridge restoration, shoreline protection, and oyster reef restoration.</p> <p>As you are aware, the Barataria and Terrebonne Estuaries are experiencing the fastest erosion rates in the state. In light of this, we feel that Master Plan projects located in the eastern portions of Terrebonne Parish should be moved to your First Period of Implementation, since this area is most in need of restoration. We ask that the state focus funding on large-scale restoration projects, so there's a greater impact over time and to support investments made in other restoration and risk-reduction projects.</p> <p>To secure a sustainable future for coastal Louisiana, the Houma-Terrebonne Chamber supports the complete restoration of the barrier islands and headland. We believe that this is an important component of our coastal restoration and should be prioritized and funded. We also support the use of the land-building power of the Mississippi and Atchafalaya Rivers to the greatest extent possible.</p> <p>In addition to the revenue coming to the state over the next 15 years from the BP settlement, the people of Louisiana and its leaders must develop additional and reliable revenue streams to fund the entire master plan.</p> <p>And finally, we urge the state to take advantage of the incredible economic and job creation opportunities that would be available with the advancement of the master plan. Recent analysis has shown the water management sector is the fastest growing job sector in Louisiana's Coastal Zone, with an average salary of almost \$70,000. Over the next 10 years, nearly 60,000 jobs could be supported by investments in restoration. Jobs that are sorely needed.</p> <p>Respectfully, Kate Theriot 2017 Chairwoman</p>

**Attachments:**

[https://citizenreach.s3.amazonaws.com/uploads/attachment/file/e3acb9b0-f2fa-0134-f0ea-1a65b667130d/Comments\\_to\\_CPRA\\_on\\_Coastal\\_Master\\_Plan\\_2-22-17.pdf](https://citizenreach.s3.amazonaws.com/uploads/attachment/file/e3acb9b0-f2fa-0134-f0ea-1a65b667130d/Comments_to_CPRA_on_Coastal_Master_Plan_2-22-17.pdf)

February 21, 2017

Coastal Protection and Restoration Authority  
150 Terrace Ave.  
Baton Rouge, LA 70802  
Re: 2017 Coastal Master Plan

To Whom It May Concern:

The Houma-Terrebonne Chamber of Commerce would like to thank the Coastal Protection and Restoration Authority for its past work in the Barataria and Terrebonne Basins, specifically we appreciate your commitment to the Morganza to the Gulf hurricane protection, including the Houma Navigational Canal lock complex. Our chamber has a membership of over 700 businesses and organizations that employ approximately 23,000 people living across this region, and these projects are vital to the businesses in our region and to our community.

One of the most significant and urgent issues facing our state, as you know, is the loss of our coast. The Houma-Terrebonne Chamber of Commerce believes that Louisiana's land loss crisis requires hurricane protection and a comprehensive suite of restoration projects, including barrier islands, marsh creation, hydrologic restoration, ridge restoration, shoreline protection, and oyster reef restoration.

As you are aware, the Barataria and Terrebonne Estuaries are experiencing the fastest erosion rates in the state. In light of this, we feel that Master Plan projects located in the eastern portions of Terrebonne Parish should be moved to your First Period of Implementation, since this area is most in need of restoration. We ask that the state focus funding on large-scale restoration projects, so there's a greater impact over time and to support investments made in other restoration and risk-reduction projects.

To secure a sustainable future for coastal Louisiana, the Houma-Terrebonne Chamber supports the complete restoration of the barrier islands and headland. We believe that this is an important component of our coastal restoration and should be prioritized and funded. We also support the use of the land-building power of the Mississippi and Atchafalaya Rivers to the greatest extent possible.

In addition to the revenue coming to the state over the next 15 years from the BP settlement, the people of Louisiana and its leaders must develop additional and reliable revenue streams to fund the entire master plan.

And finally, we urge the state to take advantage of the incredible economic and job creation opportunities that would be available with the advancement of the master plan. Recent analysis has shown the water management sector is the fastest growing job sector in Louisiana's Coastal Zone, with an average salary of almost \$70,000. Over the next 10 years, nearly 60,000 jobs could be supported by investments in restoration. Jobs that are sorely needed.

Respectfully,



Kate Theriot  
2017 Chairwoman

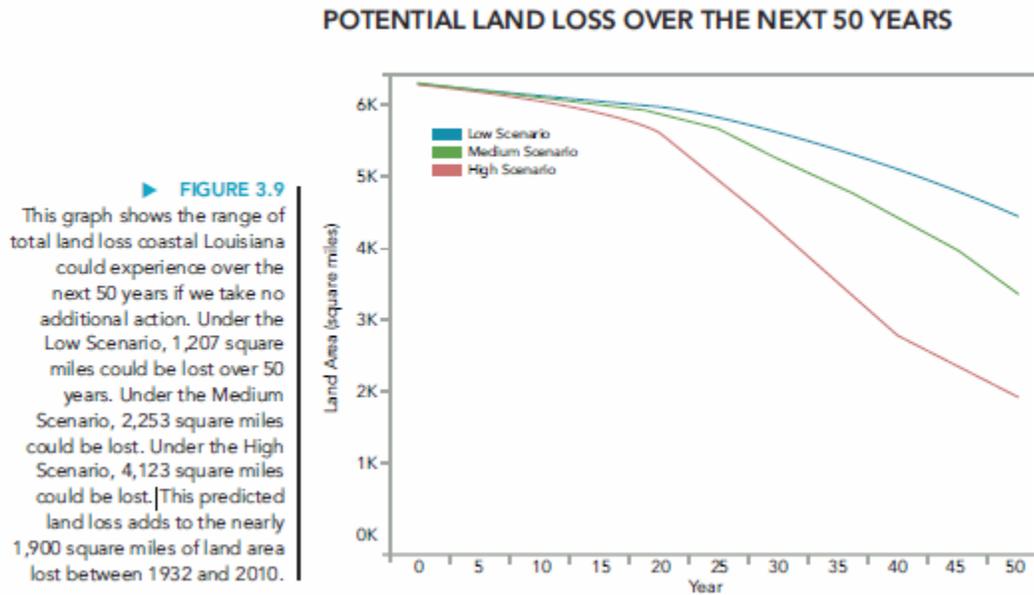
<b>Public Comment Entry #:</b> 87
<b>First Name:</b> Karen
<b>Last Name:</b> Laughlin
<b>City:</b> Morgan City
<b>State:</b> LA
<b>Content:</b> I am making comments on the DRAFT 2017 COASTAL MASTER PLAN.  I support using dredge material from the Atchafalaya River for marsh creation on Point Au Fer.  I support the concept of a long distance sediment pipeline from the Atchafalaya River to marsh creation sites in Eastern Terrebonne Parish.  I have concerns about the Increase Atchafalaya Flow to Terrebonne Parish diversion. I support the St. Mary Levee District's request to include the Bayou Chene Flood Protection and Diversion Project in the 2017 Master Plan.  I support the St. Mary Levee District's request to complete the Morgan City Back Levee Project in the near future.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 86
<b>First Name:</b> Richard
<b>Last Name:</b> Condrey
<b>City:</b> Baton Rouge
<b>State:</b> LA
<b>Content:</b> I have a question on Figure 3.9 of the 2017 Draft Master Plan. I have attempted to attach this question as a pdf file as my efforts to cut and paste the word document with its two figures in this box were not successful. Please let me know if my attachment does not come through.
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/d54fccc0-f2f8-0134-c9f5-1a65b667130d/Condrey_March_24_2017.pdf">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/d54fccc0-f2f8-0134-c9f5-1a65b667130d/Condrey_March_24_2017.pdf</a>

March 24, 2017

Dear CPRA,

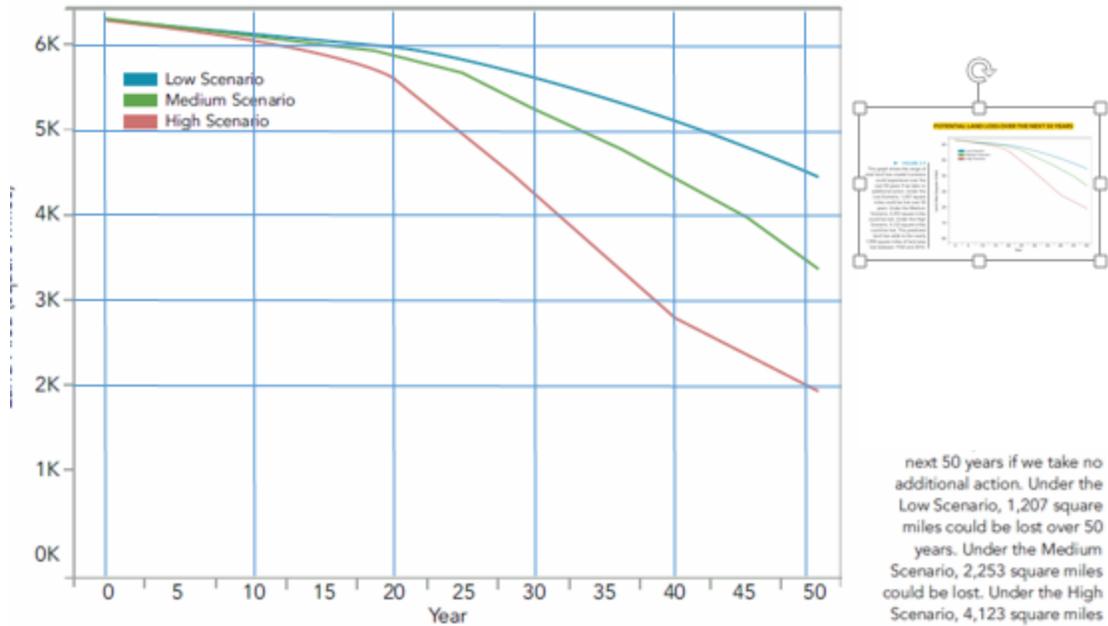
Figure 3.9 (copied below) on page 72 of the 2017 DRAFT Master Plan (CPRA 2017) “shows the range of total land loss coastal Louisiana could experience over the next 50 years if we take no additional action” under your Low, Medium, and High Scenario:



I believe there is a disagreement between the figure’s legend and the figure’s graph. Please let me know if my calculations are correct or where I have gone wrong.

The second sentence of the figure’s legend states “Under the Low Scenario, 1,207 square miles could be lost over 50 years. Under the Medium Scenario, 2,253 square miles could be lost. Under the High Scenario, 4,123 square miles could be lost.

At year 0, the graph seems to suggest (as below) that the area being considered is approximately 6,300 (6.3 K) square miles. Then at year 50, the graph seems to suggest that this same area will have 4,500 square miles under the Low Scenario, 3,500 square miles under the Medium Scenario, and 2,000 square miles under the High Scenario.



These land areas at year 50 are considerably (especially for the Low and Medium Scenarios) different than what I calculate when I subtract the 50 year land loss estimates for these three scenarios given the figure's caption from the graph's land estimate at year 0. Here I calculate 6,300 square miles - 1,207 square miles = 5,093 square miles for the Low Scenario, 6,300 square miles - 2,253 square miles = 4,047 for the Medium Scenario, and 6,300 square miles - 4,123 square miles = 2,177 square miles for the High Scenario.

Have I made a mistake? If not, which numbers should I use?

Thank you for your help,  
Richard Condrey  
coecnd@lsu.edu

CPRA (Coastal Protection and Restoration Authority of Louisiana). 2017. DRAFT Louisiana's Comprehensive Master Plan for a Sustainable Coast. Coastal Protection and Restoration Authority of Louisiana. Baton Rouge, LA. 167 pp. [http://coastal.la.gov/wp-content/uploads/2016/08/2017-MP-Book\\_2-page-spread\\_Combined\\_01.05.2017.pdf](http://coastal.la.gov/wp-content/uploads/2016/08/2017-MP-Book_2-page-spread_Combined_01.05.2017.pdf) accessed 3/24/2017.

<b>Public Comment Entry #:</b> 85
<b>First Name:</b> Harvey
<b>Last Name:</b> Stern
<b>City:</b> New Orleans
<b>State:</b> LA
<b>Content:</b> Please see attached comments
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/13bd41b0-f2f6-0134-f0ea-1a65b667130d/2017%20Coastal%20Master%20Plan%20Sierra%20Club%20comments.docx">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/13bd41b0-f2f6-0134-f0ea-1a65b667130d/2017 Coastal Master Plan Sierra Club comments.docx</a>



## SIERRA CLUB

New Orleans Group, Delta Chapter



New Orleans Group of Sierra Club,  
740 7<sup>th</sup> Street  
NewOrleansLA70115  
March 24, 2017

The New Orleans group of the Sierra Club offers the following comments on the draft 2017 La. Comprehensive Master Plan for a Sustainable Coast

Apply the Louisiana Public Trust Doctrine to the Lake Pontchartrain Barrier project (001.HP.08) and the Slidell Ring Levee (001.HP.13) prior to these projects' consideration for inclusion in the Coastal Master Plan.

"The Louisiana Public Trust Doctrine requires a reasonable, individualized and good faith consideration of factors to determine that adverse environmental impacts have been minimized or avoided to the extent consistent with public welfare. Environmental costs and benefits shall be given full consideration along with economic and other factors" ("The Public Trust Doctrine Under Louisiana Law"—A presentation to La Coastal Protection and Restoration Authority, January 18, 2011, Mark Davis, Director, Tulane Institute on Water Resources Law and Policy.) Several factors justify postponing inclusion of these projects into the Master Plan until a substantive public trust review is completed for these projects:

(a) Induced development is referenced throughout the draft Master Plan, especially in Appendix E, and is particularly applicable in regard to these projects. Appendix E states that induced development "occurs when the construction of structural risk reduction projects unintentionally [?] encourages development in flood hazard areas...they can provide a false sense of protection". Although Lake Pontchartrain is effectively a brackish bay-- an arm of the Gulf-- promoting development along and near the "lakeshore" induces the "false sense of protection" that these proposed projects will only exacerbate. Including these projects in the 2017 Master Plan without Public Trust review will certainly promote induced development in the very low lying floodplains that environmentally appropriate land use policies promoted in Appendix E would discourage. Indeed, growth in the Slidell to Mandeville North Shore floodplain is proceeding unabated.

(b) The enormous projected cost (sure to increase) of 2.4 billion dollars for the lake Pontchartrain Barrier project and 181 million dollars for the Slidell Ring Levee further justifies comprehensive Public Trust assessment. The Louisiana Public Trust requirement that economic and environmental cost/benefit analysis be performed is certainly applicable given the tremendous costs of these projects. The existing "extensive modeling analysis confirming the storm surge and damage reduction benefits of the Barrier project"

(p.140 of the draft plan) should be made available for public review and comment, and third party peer review (in cooperation with the Science and Engineering Board) to confirm that the Public Trust threshold has been achieved.

(c) Given that the Barrier and Ring Levee projects are not likely to be designed and funded in the near term, it is reasonable to request that these projects be deleted from the 2017 plan, but tentatively included in the 2022 plan pending Public Trust review justifying them.

### Incorporate Appendix E Land Use/Resiliency policy recommendations into Chapter 5: Implementation Strategy Policy Tools

A big ‘thumbs up’ to the Land Use and Resiliency Policies and recommendations found in Appendix E, specifically

- “Effective land use plans can direct development away from high hazard areas and can help to preserve the natural functions of floodplains and other critical areas.
- Land use planning is an essential ingredient in reducing flood risk to future building inventory.
- In terms of planning for future growth, a particularly challenging issue facing many communities in coastal Louisiana is induced development. Induced development occurs when the construction of structural risk reduction projects (e.g., levees) unintentionally encourages development in flood hazard areas as these projects can provide a false sense of protection. If the residual flood risk associated with structural projects is not considered in land use planning, development may gravitate to areas behind levees rather than in areas that are less hazardous to build.
- Limiting induced development during the planning, design, and implementation of structural protection projects can be accomplished by implementing a land use plan, creating stricter development standards for areas protected by levees, or maintaining pre-structural project flood damage prevention standards. “

Attachment E1 (Coastal Master Plan Flood Risk and Resilience Program Policy Recommendations) has also several words to the wise, which, if taken to heart, can only strengthen this plan::

- “The State statutes should be revised to require Parishes and municipalities to develop master plans that address sea level rise, subsidence, flood risk and land loss CWPPRA should lobby state legislators regarding this important recommended revision
- DNR should revise the “fastland “ exemption from Coastal use Permits—specifically to require Coastal use permits for properties that are projected to be below 5 feet above sea level in the next 50 years, as well properties newly encircled by levees (induced development)
- Prohibit development in wetlands and other environmentally sensitive areas and avoid development that would require new infrastructure in coastal areas”

Several pending joint CORPS/DEQ permit applications highlight the need to take your own recommendations seriously:

- (a) Near Covington adjacent to HWY 1095 is a proposed business park and residential development that would destroy nearly 15 acre of forested pine wetlands. This location is in the heart of the proposed 1.6 billion dollar St. Tammany Parish Non Structural Risk Reduction project (STT.01N)
- (b) Further west in Ascension parish, the Brookstone subdivision application is pending, which would destroy several acres of wetlands in one of the most heavily damaged areas from the August 2016 flooding. The adjacent existing subdivision—Quail Creek --submitted nearly 150 letters of opposition to Brookstone, in recognition of the vital water retention role that the lowlying proposed Brookstone subdivision site played in barely preventing flooding of their adjacent subdivision. This proposed subdivision also highlights the adverse cumulative impact of flooding and habitat loss that accompanies development induced wetland loss.
- (c) Among the most blatant examples of unwise development in the coastal zone floodplain is the existing Chemical Waste Management hazardous Waste landfill near Bayou Chopique in Calcasieu parish, less than 30 miles form the Gulf of Mexico (about the distance from Metairie to Mandeville over the Causeway). 29 acres of jurisdictional wetlands and waterbottoms will be lost for the expansion of this land fill, if permitted. The applicant had previously purchased mitigation bank credits to “compensate” for lost wetlands. It so happens this hazardous waste landfill is in the vicinity of no less than 12 proposed hydrologic modification projects listed in the draft comprehensive master plan.

In all these cases the applicant has requested, and based on thousands of previous similar applications, will likely receive permission for off site mitigation (mitigation banking)

Your own recommendations in Attachment E1 promote avoidance of wetlands --contrary to what is likely to be granted in the above examples. Mitigation banks have a mixed record at best when it comes to preserving or reviving coastal wetlands. In particular, we need to start thinking of our threatened coastal forested wetlands as a non-renewable resource—especially where salt water intrusion persists. Again, avoidance of development in wetlands must be the policy--not offsite mitigation --when it comes to CORPS and Coastal Use permits. Please give your own recommendations in Attachment E1 as much attention and effort as the structural risk reduction projects outlined in your plan

CWPRA should formalize a LA Coastal Use Permit and Corps 404 Permit Application Review procedure for Development in the Coastal Zone (Consistency review)

The forthright statement in Appendix E that "development should be prohibited in wetlands and environmentally sensitive areas", justifies a recommendation CPRA should review and comment on all Coastal Zone Management and coastal Corps 404 permit applications. The three pending permit applications described above exemplify the need for formal CPRA review. To be consistent with its own Appendix E recommendations, CWPRA should stress avoidance of wetlands in its comments and oppose offsite mitigation(mitigation banking). Additionally, and again in accordance with its own master plan land use policy, CWPRA should oppose development that would require new infrastructure in coastal areas.

CWPRA's review process should also incorporate its own recommendation (Flood Risk and Resilience Program Policy Recommendations 4.3.1, p. 25—Appendix E) that the Coastal Use Permit review process "incorporate future 2017 Coastal master Plan projections of land loss in the CUP evaluation process including subsidence and sea level rise."

This formalized review procedure should be incorporated in the Policy Tools section of the Draft Master Plan (p.141)

Thank you for the opportunity to comment.

Harvey Stern  
Delta Chapter and New Orleans Group Executive Committee

<b>Public Comment Entry #:</b> 84
<b>First Name:</b> Cyrus
<b>Last Name:</b> Provost
<b>City:</b> Morgan City
<b>State:</b> LA
<b>Content:</b> I am making comments on the DRAFT 2017 COASTAL MASTER PLAN.  I support using dredge material from the Atchafalaya River for marsh creation on Point Au Fer.  I support the concept of a long distance sediment pipeline from the Atchafalaya River to marsh creation sites in Eastern Terrebonne Parish.  I have concerns about the Increase Atchafalaya Flow to Terrebonne Parish diversion. I am asking for modeling and answers to a number of questions submitted by the Port of Morgan City.  I support the St. Mary Levee District's request to include the Bayou Chene Flood Protection and Diversion Project in the 2017 Master Plan.  I support the St. Mary Levee District's request to complete the Morgan City Back Levee Project in the near future.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 83
<b>First Name:</b> Ed
<b>Last Name:</b> Fike
<b>City:</b> Baton Rouge
<b>State:</b> LA
<b>Content:</b> On behalf of DP Land, LLC (DPL), Coastal Environments, Inc. (CEI) commends the CPRA for continuing to include 004.MC.13 (Cameron Meadows Marsh Creation) in the 2017 Master Plan as one its westernmost marsh creation projects. During the past 12 years of working for DPL, CEI has observed an active land management effort and a true commitment of stewardship. The location of the Cameron Meadows tract south of, and adjacent to, the Sabine National Wildlife Refuge will provide protection to those public lands. Cameron Meadows is rich in natural resources and restoration of marsh in its open water areas will ensure same. Thank you for the opportunity to make these comments.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 82
<b>First Name:</b> Jim
<b>Last Name:</b> Stark
<b>City:</b> Cocoa Beach
<b>State:</b> FL
<b>Content:</b> See attached letter, thanks
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/316c4be0-f2eb-0134-c9f5-1a65b667130d/GICA_Comments_DRAFT_2017_Coastal_Master_Plan.pdf">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/316c4be0-f2eb-0134-c9f5-1a65b667130d/GICA_Comments_DRAFT_2017_Coastal_Master_Plan.pdf</a>



Gulf Intracoastal Canal Association  
PO Box 321649  
Cocoa Beach, FL 32932  
[www.gicaonline.com](http://www.gicaonline.com) · 901-490-3312

March 24, 2017

The Coastal Protection and Restoration Authority  
P.O. Box 44027  
Baton Rouge, LA 70804

RE: DRAFT 2017 Coastal Master Plan Comments

Dear Sir or Madam:

Thank you for the opportunity to comment on Louisiana's 2017 Draft Coastal Master Plan. I am writing as the President, Gulf Intracoastal Canal Association (GICA) and am very pleased to have participated as an alternate member of the Framework Development Team and Navigation Focus Group building the 2017 and 2012 Master Plans.

GICA is a 112-year-old trade association representing 200 industry member companies involved in towboat and barge operations, shipping, shipyards and associated waterways industries which use the 1300 miles of Gulf Intracoastal Waterway (GIWW) between Brownsville, Texas and St. Marks, Florida. GICA is committed to facilitating commerce through ensuring safe, reliable and efficient Gulf Coast waterways.

The GIWW flows through five Gulf states and is a critical *connecting link* that ties numerous coastal ports together as well as providing access to inland river ports in the nation's heartland through its connection to the Mississippi River. It is especially important to Louisiana's economy, each year facilitating shipping of over 70 million of tons of petrochemical, oil, finished products and commodities through the state to, and from, key markets.

GICA supports the master plan process and again applauds the inclusion of navigation industry representatives of the on the Framework Development Team. Recognizing the importance of a working coast throughout all planning phases contributes significantly to ensuring long term economic viability for many industries doing business in Louisiana. Quite simply, without a sustainable coast, there is no *intracoastal*, safe, protected, waterway for transport of raw materials and products to plants and consumers. GICA urges Louisiana to expedite processes and plans to get restoration and protection projects funded and moving forward now. Preserving this working waterway, and the Louisiana jobs and businesses that depend on it, are a critical consideration.

Generally, GICA recognizes and agrees that the state's land loss problems will need a comprehensive array of restoration projects and supports barrier island building, marsh creation, hydrologic and ridge restoration, shoreline protection, and oyster reef restoration. Prioritization of projects that save the most land with the greatest impacts over time must move forward soonest, while taking advantage of the significant job creation opportunities made available implementing the Plan.

As with the 2012 Master Plan, our review of the 2017 Draft Master Plan resulted in no specific objections to the suite of projects outlined in the in the plan. As described, the projects *in this conceptual phase* appear to present no significant negative operational or safety impacts to the inland waterways navigation industry and the GIWW and will be instrumental in building land to both restore and protect Louisiana's coast. However, GICA asks that our Association and members be included in future discussions and plan development for these specific projects:

- Lafitte Ring Levee Project (002.HP.07). The conceptual plan for this project includes at least two barge gates on the GIWW which could impact navigation safety and efficiency. As project design progresses, consideration should be given to alternate alignments which may eliminate the gates on the GIWW, avoid navigation safety issues, and significant construction and O&M costs.
- Increase Atchafalaya Flow to Terrebonne (03b.DI.04). This project includes dredging of the GIWW and construction of a bypass structure at the Bayou Boeuf Lock from the Atchafalaya River to Terrebonne marshes. GICA and tow industry experts met with CPRA staff in 2016 to discuss navigation impacts of a bypass structure at Bayou Boeuf Lock. At this point it appears that our concerns regarding how increased flows will affect safe navigation have not yet been resolved. GICA looks forward to further dialog as planning progresses to ensure tows enjoy safe passage through the lock.
- Morganza to the Gulf (03a.HP.02b). This project includes several sector gates located on the GIWW which have the potential to negatively affect the safe and efficient flow of commerce. Planners are strongly urged to carefully consider gate sizing, operations, and locations to minimize GIWW navigation restriction.

GICA again appreciates the comprehensive nature of this effort. I am again pleased to have been invited to participate and look forward to continued progress with this next iteration of master planning.

Sincerely,



Jim Stark,  
President

<b>Public Comment Entry #:</b> 81
<b>First Name:</b> Spencer
<b>Last Name:</b> Murphy
<b>City:</b> NEW ORLEANS
<b>State:</b> LA
<b>Content:</b> Please see attached comments filed on behalf of Canal Barge Company, Inc. Thank you for the opportunity to comment.
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/3b09e220-f2df-0134-f0ea-1a65b667130d/Comments_to_Master_Plan_Louisiana_2017.docx">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/3b09e220-f2df-0134-f0ea-1a65b667130d/Comments_to_Master_Plan_Louisiana_2017.docx</a>

Thank you for the opportunity to comment on the State of Louisiana's 2017 Comprehensive Master Plan for a Sustainable Coast (the "Master Plan"). The following comments are submitted on behalf of Canal Barge Company, Inc.

### **Background**

Canal Barge Company, Inc. ("CBC") is one of the largest privately owned inland marine transportation companies in the United States, employing over 43 towing vessels and over 850 barges in the Inland Waterways and the Gulf of Mexico. Our area of operations stretches from Brownsville, TX to Pittsburgh, PA, and CBC employs over 850 personnel across 25 states.

CBC is a family-owned business headquartered in New Orleans, Louisiana. Our executive team is active in both national and regional efforts to develop a systematic approach to water management; both President/CEO Merritt Lane and General Counsel Spencer Murphy were members of the Master Plan's Framework Development Team ("FDT") and also participated in the Navigation Focus Group. Our presence in New Orleans means we understand the need for coastal restoration and flood protection in order to protect our Gulf Coast communities; our presence across our nation's waterways means we understand the importance of navigation to our regional and national economy. We support efforts for coastal restoration and flood protection that can co-exist with and even bolster our nation's vital marine highways, and as further described below, CBC sees the Master Plan as an important step forward in those efforts.

### **Marine Highways**

The Master Plan has the potential to impact two of our nation's most important commercial waterways: the Mississippi River and the Gulf Intracoastal Waterway ("GIWW"). According to the State of Louisiana, over 500 million tons of waterborne commerce (20% of the nation's total) travels through Louisiana each year on these waterways. The Mississippi River is one of the key economic engines of our nation and provides the most efficient means for American farmers and manufacturers to get their goods to market. For example, over 60% of our country's grain exports move through Louisiana on the Mississippi River.

Less well known than the Mississippi, but equally important, the GIWW is the nation's third busiest waterway – only the Mississippi River and Ohio River carry more goods each year than the GIWW. The GIWW is a 1300 mile system of channels and tributaries that runs from Brownsville, TX to St. Mark's, FL and connects the Gulf Coast to the Mississippi River. It provides a vital link between the Gulf Coast's petrochemical refineries and the rest of our nation, and directly and indirectly supports tens of thousands of jobs.

What makes navigation particularly relevant to the State is that the maritime industry provides one out of every 8 jobs in Louisiana (as found in a study by Dr. Tim Ryan of University of New Orleans), and further, water transport is by far the most fuel efficient and environmentally friendly mode of transportation. A recent study by the Texas Transportation Institute found that relative to truck or rail, barge transportation:

- 1) Produces fewer CO2 emissions,
- 2) Results in fewer spills of hazardous materials,
- 3) Operates with greater fuel efficiency, and
- 4) Results in fewer injuries and fatalities.

With those facts in mind, the State should take care that implementing the Master Plan does not drive commerce away from our navigable waterways. Rather, a responsible and environmentally sound policy should encourage the use of our commercial waterways over the coming decades to protect both our State's economic interests, and the livelihoods of thousands of its citizens.

### **The Master Plan Properly Recognizes the Important Role of Navigation**

Through its participation in the FDT, CBC has gained valuable insight into the process that created the Master Plan, and we are pleased to note that the Master Plan promotes a viable working coast to support regionally and nationally important businesses and industries. Further, the State created a Navigation Focus Group to ensure that navigation stakeholders had the opportunity to provide direct feedback into the drafting of the Master Plan. CBC also supports the State's decision to use "Support for Navigation" as one of the metrics used to evaluate projects for the Master Plan. The State is to be commended for its efforts to reach out to navigation stakeholders, and we encourage the State to maintain a dialogue with industry as the Master Plan's projects are implemented in the coming years.

### **Protecting Navigation During Implementation of the Master Plan**

As the State finalizes the Master Plan, we submit that one important area of focus should be to limit or eliminate any new structures built on federally authorized waterways. This is so not simply because it would reduce the overall impact to navigation, but also because there are likely much more cost-efficient and/or easier methods to achieve the same beneficial effects to restoration or flood protection. We ask that the State consider the following factors for any new gates or structures across the GIWW:

**a) Operational Safety:** Any structures built in a waterway increase the likelihood of vessel casualties, which obviously would bring a negative impact to the restoration/protection benefits of the structure. The State should view the GIWW and Mississippi River in the same way it views Interstate 10. Building a structure across a major commercial/industrial transportation artery invites a level of risk that is not present for other restoration or protection features. It is not in anyone's interest to see a vessel casualty involving a critical flood control structure, or for vessels to become stranded along the banks during an unplanned floodgate closure.

**b) Construction Delay:** The construction and maintenance of nation's marine infrastructure on federal waterways is the exclusive domain of the US Army Corps of Engineers. Currently, there are over 20 lock and dam projects (either new construction or major rehab) on the Corps' project backlog, most of which are over budget and off-schedule. Given the above, it is extremely unlikely that a new lock could be authorized, funded, and constructed on the GIWW in the foreseeable future until the current backlog of projects is addressed.

**c) Unplanned Costs:** One aspect of the Master Plan that needs further study is the cost to operate and maintain new structures. Even assuming the timely construction of new locks or gates, if they are viewed as 'flood protection' projects and not 'navigation' projects, the Corps will push back on the O+M responsibility for the structures. This situation exists today for the West Closure Complex and the IHNC Floodgate near New Orleans. Efforts are underway to ensure that the Corps retains O+M responsibility for these structures given their navigation function and location on a key federal waterway, but because of the Corps' interpretation of authorization language for these projects, it is possible that critical resources (both funds and personnel) will continue to be diverted from the local/regional levee authorities to operate these structures. Adding more locks or gates on the GIWW under the auspices of the State's Master Plan will undoubtedly lead to similar problems.

### **The Master Plan Should Be Implemented With a Sense of Urgency**

A positive aspect of the Master Plan is that it prioritizes projects across a 50 year planning horizon while seeking to fund projects that deliver the highest impact. We urge the State to move forward with all available speed on projects scheduled for the first phase of work. With the availability of RESTORE Act funds, the State has an opportunity to build on the progress of the last 11 years and bring many key projects from planning phase to construction.

One area that will certainly pose a challenge to fast implementation of the Master Plan is federal permitting. We urge the State to leverage outside stakeholders and other entities that can assist in pushing the Corps of Engineers and other agencies to streamline their permitting processes on these vital projects.

### **Conclusion**

Like many members of the Louisiana maritime industry, Canal Barge Company understands the importance of restoring our coast and protecting our citizens from storm flooding. If coastal erosion continues unabated, we may very well lose the very waterways upon which our business operates, and if our communities are not protected, we may lose our workforce, and our own homes. We thank the State for the opportunity to comment on the Master Plan, and hope that our comments will provide useful, 'real-world' feedback that will help improve the final version of the Master Plan.

Best regards,

Spencer Murphy  
General Counsel  
Canal Barge Company, Inc.

<b>Public Comment Entry #:</b> 80
<b>First Name:</b> Jay
<b>Last Name:</b> Walker
<b>City:</b> Houma
<b>State:</b> LA
<b>Content:</b> See attached file.
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/f06f1040-f2db-0134-c9f5-1a65b667130d/CPRA_CommentsMAC.pdf">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/f06f1040-f2db-0134-c9f5-1a65b667130d/CPRA_CommentsMAC.pdf</a>

March 24, 2017

Louisiana Coastal Protection and Restoration Authority  
Post Office Box 44027  
Baton Rouge, LA 70804  
*Submitted via masterplan@la.gov*

RE: Draft 2017 Coastal Master Plan

In 2006, a group of Terrebonne Parish community leaders created the Morganza Action Coalition (MAC) to promote federal authorization and funding of the Morganza-to-the-Gulf Hurricane Protection System. In 2016, we expanded our work to support levee projects of the North Lafourche Levee District and South Lafourche Levee District in addition to the work of the Terrebonne Levee and Conservation District on the Morganza project.

We are pleased to see the Morganza system once again proposed for inclusion in the 2017 Coastal Master Plan. MAC urges the CPRA, Governor Edwards and our Louisiana Legislature to continue to make the completion of this system, particularly the HNC Lock Complex, a high priority for funding in our state's integrated coastal protection and restoration plan.

The Morganza levee, lock and floodgate system consists of approximately 98 miles of earthen levee, 22 floodgates on navigable waterways, 23 environmental water control structures, and a lock complex in the Houma Navigation Canal with an adjoining floodgate and a dam closure. After nearly 30 years of studies on the Morganza system, it was federally authorized by Congress in 2014.

Morganza is designed to protect more than 150,000 residents in Terrebonne and Lafourche. Morganza is also essential to the sustainability, economic viability, and growth of Terrebonne and Lafourche Parishes, as well as our ability to continue to fuel and feed this entire nation. In fact, the entire Morganza system and Lafourche levee ties – from Golden Meadow to Gibson – protects the homes and businesses of thousands of workers who provide vital services to the Gulf of Mexico energy hub of Port Fourchon, not to mention miles of pipelines and other critical energy infrastructure.

These reasons are why the residents of Terrebonne Parish and Lafourche Parish have voted to tax themselves to fund construction of Morganza and other local levees, despite the federal government's unwillingness to fund such a critical project for our nation's energy and economic security. The State of Louisiana has recognized the importance of Morganza, and thanks to state appropriations and local tax revenue, \$350 million in local and state money has been spent or committed to date on the Morganza

system – a federally approved system that currently receives NO Federal funding.

With these local and state funds, the Terrebonne Levee District is working diligently to build the first lift of the Morganza system, with the help of the North Lafourche Levee District and South Lafourche Levee District for tie-ins on the eastern end of the hurricane protection system.

Before the start of our 2017 hurricane season, we anticipate Reach E to be completed, providing at least 36 miles of levees along the Morganza alignment – all built with only local and state funding. Design is also underway for the HNC Lock Complex, which is the centerpiece of the Morganza system, protecting the city of Houma and providing significant environmental benefits.

MAC continues to aggressively advocate for state and federal dollars to fund completion of the lock complex as soon as possible, as well as the remaining levee segments and floodgates in the Morganza system. The survival of our critical Bayou Region depends on it.

Once again, thank you for recognizing the value of the Morganza to the Gulf in Louisiana's Coastal Master Plan and for supporting our region's efforts to fund and build the system. Our Bayou Region communities not only need the protection Morganza will provide - we deserve it!

Thank you,



Jay Walker  
President

<b>Public Comment Entry #:</b> 79
<b>First Name:</b> Laura
<b>Last Name:</b> Dozar
<b>City:</b> Berwick
<b>State:</b> LA
<b>Content:</b> I support using dredge material from the Atchafalaya River for marsh creation on Point Au Fer.  I support the concept of a long distance sediment pipeline from the Atchafalaya River to marsh creation sites in Eastern Terrebonne Parish.  I have concerns about the Increase Atchafalaya Flow to Terrebonne Parish diversion. I am asking for modeling and answers to a number of questions submitted by the Port of Morgan City.  I support the St. Mary Levee District's request to include the Bayou Chene Flood Protection and Diversion Project in the 2017 Master Plan.  I support the St. Mary Levee District's request to complete the Morgan City Back Levee Project in the near future.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 78
<b>First Name:</b> Doug
<b>Last Name:</b> Daigle
<b>City:</b> Baton Rouge
<b>State:</b> LA
<b>Content:</b> [Corrected comments]  Louisiana Hypoxia Working Group Room 1197 Energy, Coast, & Environment Building Baton Rouge, LA 70803  March 23, 2017  Bren Haase Coastal Protection and Restoration Authority P.O. Box 44027 Baton Rouge, La 70804  Dear Bren,  I'm enclosing comments on the 2017 update of the Coastal Master Plan, specifically the section on Gulf of Mexico Hypoxia (p. 143), on behalf of the Louisiana Hypoxia Working Group. The Louisiana Hypoxia Working Group is a monthly forum for agencies, researchers, officials and stakeholders that has met since 2003. The Group was formed to help coordinate and support implementation of the Gulf Hypoxia Action Plan in Louisiana, and we continue to do outreach communication, and information exchange with all those groups. We appreciated being consulted for the 2007 and 2012 versions of the Master Plan.  My comments are divided into a general discussion of the issue in response to the Draft Plan's text, and then suggested changes to the text.  Sincerely, Doug Daigle Coordinator Louisiana Hypoxia Working Group  Discussion  The discussion of the Gulf Hypoxia issue on page 143 of the 2017 Draft Master Plan is incomplete in some important respects. The text mentions the Gulf Hypoxia Action Plan, which is the national vehicle for addressing this issue under the auspices of the Mississippi River/Gulf of Mexico Watershed Nutrient Task Force. Louisiana has been a participant in this effort since it began in 1997, along with key federal agencies and other states along the Mississippi and Ohio Rivers.

The initial version of the Action Plan in 2001 called for achieving an average annual size of the Gulf Hypoxic zone of 5000 square kilometers (about 1950 square miles) by 2015. This central goal of the Plan was reaffirmed in its 2008 revision, but was not achieved by 2015. In 2014 the Task Force began an assessment process to address this situation. They agreed to retain the 5000 square kilometer goal, but adopted a new target date of 2035 for achieving this. They also committed to an Interim Target of achieving a 20% reduction in nutrient loading (nitrogen and phosphorus) to the Gulf by 2025. These are now the key components of the Action Plan.

The Interim Target is the key milestone for reaching the central goal of the Action Plan \_ if it is met, then achieving the Coastal Goal (5000 square kilometer average annual size of the zone) is also achievable. If it isn't, then reaching that goal is not likely. The 20% reduction represents a cumulative result of efforts by states, agencies, and other players in the Mississippi River Basin. It is also a commitment \_ Louisiana, along with the other Task Force states and partner agencies, committed to work to help reach the Interim Target. The Interim Target is, or should be, the focus of action by the Task Force states.

As the Master Plan text mentions, Louisiana developed a state nutrient strategy, following the 2008 Action Plan agreement that each state develop a Nutrient Reduction Strategy, but chose to cast it as a Nutrient Management Strategy, despite its earlier agreement. Louisiana's strategy was adopted in 2014, before the Interim Target as agreed on by the Task Force, and was thus not specifically designed to meet that Target. Many of the elements it contains can help meet it, if carried out on a timetable that can do so. The centerpiece of the Louisiana nutrient strategy, river diversions, could only contribute through the existing diversions, since the next new diversion (Mid-Barataria) is slated to begin construction in 2021 or 2022, and thus is unlikely to be completed before 2025. Any impact from existing diversions can be measured through the monitoring system mentioned on p. 143.

Louisiana's contribution to reaching the Interim Target will largely come from the other elements of its strategy, primarily point and non-point source nutrient reductions. There has been progress in both these areas, but there are opportunities to expand activity in both as well. We have pointed out that one opportunity has come about through the RESTORE Act, which can fund projects that directly benefit the health of the Gulf of Mexico. Louisiana has the option of directing a small portion of RESTORE Act funds to conservation and agricultural management efforts in the Ouachita River Basin in the northeast part of the state, which is its major area of nutrient loading to the Gulf (through the Atchafalaya River). This area has seen considerable conservation work already through the efforts of the Louisiana Office of Soil and Water Conservation, Department of Environmental Quality, and the U.S. Department of Agriculture's Natural Resources Conservation Service (NRCS), along with private partners like Ducks Unlimited and the Nature Conservancy. So important groundwork has been laid should the state decide to take advantage of this opportunity.

It has always been recognized that most of the nutrient loading to the Mississippi River comes from upstream in the basin. Louisiana can do much more to promote and support greater action upriver, both through outreach by the Governor and through efforts by our Congressional delegation to obtain more funding for Action Plan implementation upriver. Doing so is clearly in the state's interest, since the impacts of Gulf Hypoxia on fisheries, the seafood industry, and our coastal ecosystems are felt here. There are benefits for upriver states in improving water quality, soil conservation, agricultural efficiency, and wildlife habitats, which have long been points of agreement in the joint effort to address this important problem. An important collateral benefit to Louisiana of achieving the 20% reduction in nutrient loading to the Gulf is that doing so can help alleviate some of the concerns that a number of stakeholders have expressed about the negative impacts of directing river diversions into coastal basins and estuaries.

**Suggested Text Changes**

In the interests of accuracy, the sentence stating that the state Nutrient Management Strategy is aligned to the goals of the Action Plan should be dropped. A more accurate and complete statement would something like the following.

“In 2015, the Gulf Hypoxia Action Plan was revised to aim for reaching its central goal of an average annual size of the hypoxic zone of 5000 square kilometers (1950 square miles) by the year 2035. The Task Force also committed to reach an Interim Target of achieving a 20% reduction in nutrient loading to the Gulf by 2025. The Interim Target would be reached by the cumulative efforts of Task Force states and agencies, along with partners the private sector, through programs and projects in the Mississippi River Basin.

“Louisiana adopted a Nutrient Management Strategy in 2014 which focuses on six key areas: river diversions, nonpoint source management, point source pollution management, incentives, leveraging opportunities, and new science-based technologies and applications. Several of these can be employed to help reach the 2025 Interim Target. As a collateral benefit, achieving a 20% reduction in nutrient loading to the Gulf could help alleviate the concerns of some stakeholders about directing Mississippi River water into coastal bays and estuaries.

“The Louisiana Nutrient Management Strategy is being implemented by an interagency team [continue with current text].”

**Attachments:**

[https://citizenreach.s3.amazonaws.com/uploads/attachment/file/4d26fb40-f2ca-0134-421d-1a65b667130d/LHWG\\_Comments\\_2017\\_CMP.docx](https://citizenreach.s3.amazonaws.com/uploads/attachment/file/4d26fb40-f2ca-0134-421d-1a65b667130d/LHWG_Comments_2017_CMP.docx)

**Louisiana Hypoxia Working Group  
Room 1197  
Energy, Coast, & Environment Building  
Baton Rouge, LA 70803**

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March 23, 2017

Bren Haase  
Coastal Protection and Restoration Authority  
P.O. Box 44027  
Baton Rouge, La 70804

Dear Bren,

I'm enclosing comments on the 2017 update of the Coastal Master Plan, specifically the section on Gulf of Mexico Hypoxia (p. 143), on behalf of the Louisiana Hypoxia Working Group. The Louisiana Hypoxia Working Group is a monthly forum for agencies, researchers, officials and stakeholders that has met since 2003. The Group was formed to help coordinate and support implementation of the Gulf Hypoxia Action Plan in Louisiana, and we continue to do outreach communication, and information exchange with all those groups. We appreciated being consulted for the 2007 and 2012 versions of the Master Plan.

My comments are divided into a general discussion of the issue in response to the Draft Plan's text, and then suggested changes to the text.

Sincerely,

Doug Daigle  
Coordinator  
Louisiana Hypoxia Working Group

Discussion

The discussion of the Gulf Hypoxia issue on page 143 of the 2017 Draft Master Plan is incomplete in some important respects. The text mentions the Gulf Hypoxia Action Plan, which is the national vehicle for addressing this issue under the auspices of the Mississippi River/Gulf of Mexico Watershed Nutrient Task Force. Louisiana has been a participant in this effort since it began in 1997, along with key federal agencies and other states along the Mississippi and Ohio Rivers.

The initial version of the Action Plan in 2001 called for achieving an average annual size of the Gulf Hypoxic zone of 5000 square kilometers (about 1950 square miles) by 2015. This central goal of the Plan was reaffirmed in its 2008 revision, but was not achieved by 2015. In 2014 the Task Force began an assessment process to address this situation. They agreed to retain the 5000 square kilometer goal, but adopted a new target date of 2035 for achieving this. They also committed to an Interim Target of achieving a 20% reduction in nutrient loading (nitrogen and phosphorus) to the Gulf by 2025. These are now the key components of the Action Plan.

## Louisiana Hypoxia Working Group – Master Plan Comments - 2

The Interim Target is the key milestone for reaching the central goal of the Action Plan – if it is met, then achieving the Coastal Goal (5000 square kilometer average annual size of the zone) is also achievable. If it isn't, then reaching that goal is not likely. The 20% reduction represents a cumulative result of efforts by states, agencies, and other players in the Mississippi River Basin. It is also a commitment – Louisiana, along with the other Task Force states and partner agencies, committed to work to help reach the Interim Target. The Interim Target is, or should be, the focus of action by the Task Force states.

As the Master Plan text mentions, Louisiana developed a state nutrient strategy, following the 2008 Action Plan agreement that each state develop a Nutrient Reduction Strategy, but chose to cast it as a Nutrient Management Strategy, despite its earlier agreement. Louisiana's strategy was adopted in 2014, before the Interim Target as agreed on by the Task Force, and was thus not specifically designed to meet that Target. Many of the elements it contains can help meet it, if carried out on a timetable that can do so. The centerpiece of the Louisiana nutrient strategy, river diversions, could only contribute through the existing diversions, since the next new diversion (Mid-Barataria) is slated to begin construction in 2021 or 2022, and thus is unlikely to be completed before 2025. Any impact from existing diversions can be measured through the monitoring system mentioned on p. 143.

Louisiana's contribution to reaching the Interim Target will largely come from the other elements of its strategy, primarily point and non-point source nutrient reductions. There has been progress in both these areas, but there are opportunities to expand activity in both as well. We have pointed out that one opportunity has come about through the RESTORE Act, which can fund projects that directly benefit the health of the Gulf of Mexico. Louisiana has the option of directing a small portion of RESTORE Act funds to conservation and agricultural management efforts in the Ouachita River Basin in the northeast part of the state, which is its major area of nutrient loading to the Gulf (through the Atchafalaya River). This area has seen considerable conservation work already through the efforts of the Louisiana Office of Soil and Water Conservation, Department of Environmental Quality, and the U.S. Department of Agriculture's Natural Resources Conservation Service (NRCS), along with private partners like Ducks Unlimited and the Nature Conservancy. So important groundwork has been laid should the state decide to take advantage of this opportunity.

It has always been recognized that most of the nutrient loading to the Mississippi River comes from upstream in the basin. Louisiana can do much more to promote and support greater action upriver, both through outreach by the Governor and through efforts by our Congressional delegation to obtain more funding for Action Plan implementation upriver. Doing so is clearly in the state's interest, since the impacts of Gulf Hypoxia on fisheries, the seafood industry, and our coastal ecosystems are felt here. There are benefits for upriver states in improving water quality, soil conservation, agricultural efficiency, and wildlife habitats, which have long been points of agreement in the joint effort to address this important problem. An important collateral benefit to Louisiana of achieving the 20% reduction in nutrient loading to the Gulf is that doing so can help

### Louisiana Hypoxia Working Group – Master Plan Comments - 3

alleviate some of the concerns that a number of stakeholders have expressed about the negative impacts of directing river diversions into coastal basins and estuaries.

#### Suggested Text Changes

In the interests of accuracy, the sentence stating that the state Nutrient Management Strategy is aligned to the goals of the Action Plan should be dropped. A more accurate and complete statement would something like the following.

“In 2015, the Gulf Hypoxia Action Plan was revised to aim for reaching its central goal of an average annual size of the hypoxic zone of 5000 square kilometers (1950 square miles) by the year 2035. The Task Force also committed to reach an Interim Target of achieving a 20% reduction in nutrient loading to the Gulf by 2025. The Interim Target would be reached by the cumulative efforts of Task Force states and agencies, along with partners the private sector, through programs and projects in the Mississippi River Basin.

“Louisiana adopted a Nutrient Management Strategy in 2014 which focuses on six key areas: river diversions, nonpoint source management, point source pollution management, incentives, leveraging opportunities, and new science-based technologies and applications. Several of these can be employed to help reach the 2025 Interim Target. As a collateral benefit, achieving a 20% reduction in nutrient loading to the Gulf could help alleviate the concerns of some stakeholders about directing Mississippi River water into coastal bays and estuaries.

“The Louisiana Nutrient Management Strategy is being implemented by an interagency team [continue with current text].”

<b>Public Comment Entry #:</b> 76
<b>First Name:</b> Monica
<b>Last Name:</b> Mancuso
<b>City:</b> Morgan City
<b>State:</b> LA
<b>Content:</b> I am making comments on the DRAFT 2017 COASTAL MASTER PLAN.  I support using dredge material from the Atchafalaya River for marsh creation on Point Au Fer.  I support the concept of a long distance sediment pipeline from the Atchafalaya River to marsh creation sites in Eastern Terrebonne Parish.  I have concerns about the Increase Atchafalaya Flow to Terrebonne Parish diversion. I am asking for modeling and answers to a number of questions submitted by the Port of Morgan City.  I support the St. Mary Levee District's request to include the Bayou Chene Flood Protection and Diversion Project in the 2017 Master Plan.  I support the St. Mary Levee District's request to complete the Morgan City Back Levee Project in the near future.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 75
<b>First Name:</b> Michael
<b>Last Name:</b> Tritico
<b>City:</b> Longville
<b>State:</b> LA
<b>Content:</b> Attached is a 5 page set of comments from RESTORE. I will also be mailing a hard copy of the comments tomorrow, 03/24/2017. I would hope that comments that arrive Monday morning 03/27/2017 would be acknowledged as having made the deadline of March 26 even though that day will be a Sunday and a day with no mail service. Thank you for the opportunity to submit comments. Michael Tritico
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/88a795c0-f26b-0134-28f7-2e85a4fc0d5e/RESTOREcmts2017CPRAplan.doc">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/88a795c0-f26b-0134-28f7-2e85a4fc0d5e/RESTOREcmts2017CPRAplan.doc</a>

RESTORE  
P.O. Box 233  
Longville, LA  
70652

Louisiana CPRA  
P.O. Box 44027

Baton Rouge, Louisiana 70804

Re: Comments on 2017 Master Plan

To Louisiana CPRA,

I am enclosing the following comments on behalf of RESTORE (Restore Explicit Symmetry To Our Ravaged Earth), a non-profit organization based in Southwest Louisiana (not to be confused with the RESTORE Act or Council.) Our area of focus is Southwest Louisiana, and our comments will focus on that portion of the Coastal Master Plan.

The 2017 Draft describes two major Southwest Louisiana projects in its opening section. The Cameron Shoreline Restoration, which dredged sites 20 miles offshore to move nearly 2 million cubic yards of beach-grade sands to build up and widen eroded sections of the beach. The Calcasieu Ship Channel Salinity Control Measure, which was under consideration in the 2012 Master Plan, is still under design and has expanded to include a series of gates, locks, and sills to block saltwater intrusion.

RESTORE had suggested a saltwater control structure at the mouth of Calcasieu Pass 20 years ago. The original 18 foot deep channel, which had a hemispherical sand bar at its mouth that blocked most of the salt water, has been dredged to 40 feet deep in some places, 45 in others. The sand bar has been removed. The meander loops have been cut out, straightening the river and altering the natural hydrological system.

The 2017 draft gives a summary of what has happened in this area that also points to the biggest problem facing the coastal program here:

“The hydrology of the Chenier Plain has been substantially altered by the construction of navigation channels including the Calcasieu Ship Channel, Sabine-Neches Waterway, Gulf Intracoastal Waterway and numerous smaller canals. Saltwater intrusion due to these channels and relative sea level rise are considered to be the largest drivers of wetland loss in the Chenier Plain. “ (p. 40)

A recent paper by scientists at Tulane University puts the problem in even starker terms, concluding that 58% of the sites they examined in Southwest Louisiana are not expected to keep pace with relative sea-level rise, meaning that this part of the coast is more vulnerable than had been realized, even compared with the rapid subsidence of areas near the Mississippi River. (Janowski, et al, “Vulnerability of Louisiana’s coastal wetlands to present day rates of relative sea-level rise,” Nature Communications 8, March 14, 2017; <http://www.nature.com/articles/ncomms14792>).

Projected sea-level rise presents an even more imposing challenge, because it will be driven by the global process of a warming climate resulting from build-up of carbon,

methane, and other greenhouse gases from human activities. While this is a global process, Southwest Louisiana is playing a prominent role. The non-profit group Environmental Integrity Project released a report in 2016, “Greenhouse Gases from a Growing Petrochemical Industry,” that projected this state’s ghg emissions to grow by a third because of projects being approved or proposed, many of them in SW Louisiana (<https://www.desmogblog.com/sites/beta.desmogblog.com/files/Petrochemical%20Industry%20Pollution.pdf>).

This report states that

“In the Bayou state, 20 petrochemical projects were proposed or authorized in 2015 that are expected to produce the equivalent of 68 million tons per year of carbon dioxide, as much as 15 new coal power plants. To put this in perspective, Louisiana today only has only six coal plants operating at four locations. The entire state – including its electric utility sector -- produces about 230 million tons of greenhouse gases per year, according to a 2012 estimate from the World Resource Institute. That means the projects proposed or permitted in just one year -- 2015 – will boost the state’s total emissions by about 30 percent.” (p. 2)

Some of the largest facilities – and emissions per tons annually – are in Southwest Louisiana:

Sabine Pass Liquid Natural Gas (LNG) Terminal, Cameron, La – 7,919,243 tons

Lake Charles Methanol and Methanol Gasification Facility, Calcasieu, LA – 6,015,208 tons

Trunkline LNG Export, Lake Charles Liquefaction Export Terminal – 4,513,540 tons

Venture Global Calcasieu Pass, LLC, Cameron, La – 4,505,232

For a point of comparison, the report states that “a 500 megawatt coal plant running at full capacity around the clock will release about 4.6 million tons of carbon dioxide a year. By comparison, the Cameron LNG Liquefaction plant... which received a permit on January 14, 2016, is authorized to emit twice that much – up to 9 million tons of greenhouse gases per year.” (p.2)

They estimate that the seven LNG terminals that were proposed or permitted in Louisiana in 2015 that could eventually release 32.6 million tons per year of greenhouse gases – the equivalent of seven new coal-fired power plants.

Louisiana has not been requiring carbon capture and/or storage at these facilities. As RESTORE noted in our comments (2016) to the Louisiana Department of Environmental Quality (LDEQ) on the permit for the Magnolia LNG Facility: “pages after pages of alternatives... were rejected for diminishing greenhouse gas emissions. Even though the Denbury Green Pipeline is only 20 miles north of the Magnolia LNG Facility, carbon capture and sequestration was ruled out entirely. Furthermore, nowhere does the company or LDEQ acknowledge that methane emissions have 25 times the adverse impact on climate change as do carbon dioxide emissions... Surely the effect of climate change on the acceleration of the rise in sea level should have gotten LDEQ’s attention here in Louisiana where we have already seen thousands of people affected by inundations.”

Despite the state's lack of initiative on this issue, the federal government has been willing to invest in such possibilities here (at least under the Obama administration.) The Washington Post on December 21, 2016 carried an article describing the U.S. Department of Energy's announcement that it was prepared to guarantee up to \$2 billion in loans to the Lake Charles Methanol Project for carbon capture and storage (CCS). The Project is described as a variation of the usual CCS, in which carbon would be stripped out of petroleum coke, a by-product of oil refining. The project could have potentially stored 4.2 million tons of carbon dioxide a year, larger than most other CCS projects thus far.

Instead of continuing to miss opportunities to include climate and greenhouse gas emissions in its decisions and policies, the state should make the sensible choice to change course on this issue, for economic as well as environmental reasons. Both come together in the Coastal Master Plan, and in Southwest Louisiana in particular, where billions in tax incentives have been given for new industrial facilities, and the costs of maintaining and improving the port and Channel facilities are rising along with coastal protection and restoration's price tag for proposed levees and marsh restoration.

Another document of record, the *Southwest Coastal Louisiana Study* (2016) prepared by the Corps of Engineers and partner looked at the worsening situation for the Chenier Plain, recognized that its efforts at coastal storm damage risk reduction and ecosystem restoration will be affected over time by sea-level rise and other climate changes (Appendix O, p. O-3), and recommends a combination of non-structural adaptation and response measures combined with aggressive ecosystem restoration.

(<http://www.mvn.usace.army.mil/About/Projects/Southwest-Coastal/>)

Neither the Coastal Master Plan nor the Southwest Study address the greenhouse gas factor in fueling sea-level rise, flooding, and land loss, but the success of both efforts clearly depends on doing so. Just as RESTORE's comments about sea level rise were ignored many years ago, it is a disgrace that climate change voices are also being ignored.

In past comments RESTORE has pointed out that the maritime and petrochemical industries of Southwest Louisiana are claiming to be capitalistic and elements of a free enterprise system but they pay only a very small share of the costs of maintenance dredging of the Calcasieu Ship Channel. Furthermore, they pay nothing to the homeowners in the City of Lake Charles who are having to elevate their houses because the straightening and deepening of the Calcasieu River now provides a high speed conduit for sea water to travel inland and onto the streets and into the neighborhoods of the town during even weak hurricanes. I have heard the phrase: "Cost of doing business..." from true capitalists, but not from the quasi-capitalists in the maritime and petrochemical businesses.

RESTORE has asked before and we now ask again: How much marsh is lost for every additional depth of dredging that happens in the Calcasieu Ship Channel? We saw how much the authorized 40 foot depth destroyed by 2012, (although the connection was not spelled out), but how much more is being lost with the implementation of the

unauthorized “advanced dredging” down to 45 feet? Surely that calculation is not beyond the expertise of your engineers.

The Port of Lake Charles is running a commercial on local television saying that they need public support for taxpayer money to dredge the Ship Channel since 46 cents of every dollar that circulates in Southwest Louisiana is generated by that channel. If the channel is that lucrative then surely its prime beneficiaries can pay their own way, if they are true capitalists. If not, then they are simply powerful hogs at the public trough and should be ashamed of themselves for perpetrating the myth of free enterprise here.

Something else we have plead for, year in and year out, is that the dredging of the Calcasieu Ship Channel, if it does occur, be timed to take place when there are not significant migrations of aquatic organisms into or out of the wetlands and river. RESTORE has repeatedly, since 1977, provided a Migratory Clock diagram to show when the major pulses of migratory animals occur. If you really care to see it, check your files. (Surely you have enough staff members that one of them could view the diagram and at last make some kind of comment about it, good or bad. That is just common courtesy.)

RESTORE has also asked repeatedly that you provide the public with truthful assessments of specific projects that were implemented before tropical storms and exactly how those projects each fared with each subsequent storm. It makes no sense to hide a project’s having been washed away and then propose another project at the same distance from the coastline, equally as vulnerable, equally as likely to be a waste of money. It is time for you to provide those project fates clearly and without spin.

Something that would be especially helpful in the best element of our coastal planning process, which is the sensible concept of relocation, would be an easy to provide map showing, from the Texas border to the Mississippi border, the maximum inshore limit of storm surge based upon the National Hurricane Center’s SLOSH model, with another contour inland from that line showing the location of a twenty-five foot higher buffer elevation. That should be an elevation to where people could relocate knowing that they would likely be immune to storm surge for a generation or two at least.

RESTORE was, we believe, the first entity to beg for inclusion of sea level rise data in the coastal restoration process. We were the first to suggest a sea water control structure at the mouth of the Calcasieu Ship Channel. We have been the first to ask for truthful assessments of the fate of implemented projects. We are the first to have provided a workable compromise (migratory clock based dredging) to try to offset adverse impacts of the maritime and petrochemical industries’ relentless push for increased dredging. Although RESTORE was not formed until 1974, as an individual I called for relocation of vulnerable communities at least as early as 1973. I do

appreciate that things have moved (very begrudgingly) in the direction of our leadership. One would think that a complete and thorough review of all the past comments and testimonies RESTORE has submitted might go a long way in helping new planners catch up. To any of you who are not too proud to see realities that some of your peers continue to avoid, thank you for having the courage to choose a path of common sense backed up by good science.

Sincerely,

Michael Tritico, Biologist and President of RESTORE

<b>Public Comment Entry #:</b> 74
<b>First Name:</b> Kenneth
<b>Last Name:</b> Ragas
<b>City:</b> New Orleans
<b>State:</b> LA
<b>Content:</b> The 2017 master plan contains the same unjust river diversion projects as the 2012 plan. It is obvious that public input is totally ignored by Mr. Bradberry and his staff. CPRA was established for the people not for projects to be shoved down the throats of the stake holders. The attachments clearly shows that the validation of the diversion model is erroneous.
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/d0748c40-f21e-0134-2381-2e85a4fc0d5e/West_Bay_2010_Island_Construction.jpg">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/d0748c40-f21e-0134-2381-2e85a4fc0d5e/West_Bay_2010_Island_Construction.jpg</a>

## SRED Construction 2010

West Bay Diversion



750,000 yd<sup>3</sup> placed from Anchorage

Island Dimensions:

5000' x 500' x 8' (+4' MSL)  
60 acres

Total BU acres built to date=511 acres at \$20M  
4.19MCY \$4.75/CY

10.00 x 7.50 in

<b>Public Comment Entry #:</b> 73
<b>First Name:</b> John
<b>Last Name:</b> Driscoll
<b>City:</b> Metairie
<b>State:</b> LA
<b>Content:</b> Comments to the Draft 2017 Coastal Master Plan
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/eb38d010-f215-0134-28f7-2e85a4fc0d5e/2017_Master_Plan_Comments_-_JDriscoll.pdf">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/eb38d010-f215-0134-28f7-2e85a4fc0d5e/2017_Master_Plan_Comments_-_JDriscoll.pdf</a>

John J. Driscoll  
5200 Alphonse Court  
Metairie, Louisiana 70006  
(504)329-6310  
jjdmetla@bellsouth.net

March 23, 2017

**DRAFT 2017 Coastal Master Plan - Public Comment**

The Coastal Protection and Restoration Authority  
P.O. Box 44027  
Baton Rouge, Louisiana 70804

I have been involved in Louisiana coastal issues and projects for over 30 years. That experience has involved writing letters to the editor of the Times-Picayune, writing letters to members of Louisiana's Congressional delegation and others including the governor's office, successfully negotiating with the U.S. Army Corps of Engineers (Corps) and winning a design revision to a Corps project, serving on the board of the Coalition to Restore Coastal Louisiana (CRCL (1998 – 2002)) and working as an active committee member of Ducks Unlimited (1993 – present) and serving on Ducks Unlimited's state executive committee (2010 – 2012). More recently, I have served the Tulane Institute on Water Resources Law and Policy as a financial analyst in assisting the Institute in publishing three white papers (Financing the Future I, II and III) in the Financing the Future series. Those papers focused on the need to find reliable and predictable funding sources for coastal restoration and that a lack of funding has limited restoration progress.

The comments below represent those of no one other than myself.

My comments to the 2017 Draft of the Louisiana Comprehensive Master Plan for a Sustainable Coast (Plan, Master Plan or 2017 Master Plan) follow:

**Master Plan Background**

The Coastal Protection and Restoration Authority (CPRA) is required to develop a master plan every 5 years and an annual plan every year that includes at least a three-year projection of expenditures and funding available for projects and programs contained in the master plan. These plans are subject to the approval of the state legislature.

The CPRA issued its first master plan in 2007 and its second master plan in 2012 (2012 Master Plan). The third iteration of the plan, the 2017 Master Plan, was issued in draft form for public comment in January 2017. The current annual plan, the 2017 Annual Plan, outlines planned expenditures and funding sources for state fiscal years 2018 through 2020.

**Lack of Funding**

The 2012 Coastal Master Plan had a \$50 billion constant dollar (without inflation) price tag spread over a 50 year implementation period. The 2012 Master Plan was a front-end loaded plan: \$26 billion in the first 20 years (an average of \$1.3 billion per year), \$15 billion in the following 20 years and \$9 billion in the final 10 years. As Financing the Future II pointed out, adding inflation at just 2.3% to these figures increased the cost and therefore the funding required to implement the 2012 Master Plan to approximately \$92 billion. Even after including the Master Plan's two major sources of funding, the Gulf of Mexico Energy Security Act (GOMESA) and the BP Oil Spill fines and settlement, that paper identified a \$71 billion funding gap with much of the shortfall occurring in the first 20 years. Subsequent analysis

identified a funding gap of \$22 billion in the critical first 20 years of the plan. Financing the Future II also estimated that the CPRA had significantly underspent the amount of money required to implement the 2012 Master Plan: “In the years since the 2012 Coastal Master Plan was published, the LACPRA has yet to bring in enough revenue in any year to meet its mark of \$1.3 billion in either 2010 nominal or real dollars. If we look at each annual plan’s projected three-year revenues from FY 2012-2016, the average total for each three year period is only \$1.476 billion, which breaks down into average annual revenue of just \$492.1 million.”

Determining actual historical expenditures on Master Plan projects for the Financing the Future II analysis was not possible because, although the CPRA is charged with spending hundreds of millions of dollars, it has only just recently been able to account for expenditures on a project by project basis. Yes, that’s right. The CPRA cannot tell what it has actually spent on the individual projects under its stewardship from the inception of the authority (2008) through June 30, 2014 when it made a switch to a new accounting system. Even though the Authority says it has the ability to track costs by project now, it is unclear whether or not it is actually using the new system to properly account for project costs since no historical data is presented in either the 2017 Master Plan or 2018 Annual Plan.

### **Legislative Auditor Report**

The Louisiana Legislative Auditor completed a “performance audit” of the CPRA “to evaluate the CPRA’s oversight of project funding and outcomes”. Its report, Oversight of Project Funding and Outcomes Coastal Protection and Restoration Authority, was issued in January 2016. Its findings, quoted below, offer a glimpse into the lack of financial acumen at the Authority.

- CPRA has identified \$19.5 billion in potential funding for the \$50 billion Master Plan: however, only \$9.7 billion of this potential funding is guaranteed.
- CPRA did not account for inflation and project scope changes in its cost projections, which could increase or decrease the total estimated funding needed to complete Master Plan projects.
- Until fiscal Year 2015, CPRA management was unable to determine actual state costs, including contract expenditures on a project-by-project basis. However, CPRA converted to a new accounting system in [fiscal] 2015 that will allow them to track actual project costs.
- CPRA has not verified that the state matches for cost-sharing projects led by the federal government are correct. Since 2008, the state’s cost share for Coastal Wetlands Planning, Protection, and Restoration Act (CWPPRA) projects led by the federal government has been \$47.7 million. However, CPRA has not verified the accuracy of this amount.
- CPRA does not require that pre-construction agreements with levee districts for protection projects outline the estimated operation and maintenance costs or how these costs will be paid. Without proper maintenance, the lifespan of projects may be shortened by the natural environment and its intended benefits may not be fully realized.
- CPRA does not evaluate whether projects are meeting the objectives in the Master Plan. This information is important because it shows whether expected results are being achieved.
- To increase the transparency of its activities, CPRA should develop a public report to communicate actual funding and expenditures and whether Master Plan

objectives are being met. Showing this information may also help the state attract the additional funding it will need to fully implement its Master Plan.

### **Observations Regarding the 2017 Master Plan and 2018 Annual Plan**

I am a CPA by training and a financial analyst by profession. I hold a B.A. in Economics from Louisiana State University and a M.B.A. from Tulane University. I have run financial planning and analysis for two Fortune 300 companies and have been an investment officer with two private equity funds. I have authored many plans.

Like its predecessor, the 2012 Master Plan, the 2017 Master Plan provides virtually no information on funding or historical costs on either a project basis or in total. While the Master Plan totals some 167 pages not counting appendices, the report devotes only one half of a page (page 82) to “Setting A Budget” and only 4 pages (pages 126 – 129) to a brief and mostly unquantified discussion of near term funding sources. Nowhere in either the 2017 Master Plan or 2018 Annual Plan is long term funding discussed or quantified.

In my opinion, financial reporting for Louisiana’s coastal activities has some serious shortcomings. Additional observations on the inadequacy of the 2017 Master Plan and 2018 Annual Plan as they relate to financial reporting, transparency and accountability follow:

- **Financial Reporting 1** - Plans are not just about the future. They are about the past as well because the past serves as a benchmark for the future. We are about 10 years out from the 2007 Master Plan, yet there is not a single schedule comparing progress on the ground or monies spent on a historical basis to Master Plan objectives or prior year’s budgets. No one knows how much money has been spent, what progress has been made or what it has been spent on.
- **Financial Reporting 2** - The Summary Expenditure Schedule outlining planned expenditures in the 2018 Annual Plan (Table ES-2: Projected Three-Year Expenditures’ (FY 2018 – FY 2020) on page 69) does not classify expenditures by projects, but rather by the funding sources (“revenues” in Master Plan vernacular) that finance them – a very strange presentation which sheds no light at all on the question of which projects are actually being constructed or how much those projects cost. The line items on the expenditure schedule for the year 2018 total 22 lines covering \$663.3 million of expenditures. Eleven of those lines covering \$551.3 million of expenditures are repeated on the Projected Three-Year Revenue schedule. This redundancy provides zero information about the nature of the expenditures.
- **Financial Reporting 3** - There are detailed schedules that support the Summary Expenditure Schedule contained in the 2018 Annual Plan. Some of the schedules are in the main body of the Annual Plan and others can be found in Appendix B – Three-Year Expenditure Projections. Best practices in financial reporting require that detailed schedules “tie back” to summary schedules and in that way assure accuracy and inform the reviewer that the details are inclusive of all the items represented in the summary. A few of the detailed schedules do “tie back” to the Summary Expenditure Schedule, however, most do not, leaving doubt about what those schedules actually represent.
- **Financial Reporting 4** - While the 2017 Master Plan declares itself to be “front-loaded for the first 30 years”, the Plan does not provide any breakdown of its spending plans other than the 3 years (2018, 2019 and 2020) included in the 2018 Annual Plan. It is, therefore, impossible to estimate the total funding that the 2017 Master Plan will require in inflation adjusted dollars.
- **Financial Statements** - The CPRA is a division of the Governor’s Office. As such, the CPRA does not issue its own financial statements. However, an authority with so much money under its care and charged literally with saving South Louisiana should issue its own financial statements

along with the disclosures required in accordance with Generally Accepted Accounting Principles (GAAP) including a management discussion and analysis, a reconciliation of actual results to the prior year's budget and supplemental information as required to inform the public of its progress in fulfilling its mission of protecting and restoring the Louisiana coast.

- **Longer Time Horizon** - From conception to completion, coastal restoration and protection projects can take over a decade to complete. While the law that set up the Master Plan process requires a minimum 3 year planning horizon, three years is simply too short a timeframe to develop funding plans that are required to see projects (many of which cost hundreds of millions of dollars) successfully completed from start to finish. A 10 year planning horizon is required.
- **Budget v. Actual** - The annual plans do not provide an analysis of performance against prior year's budgets either on a macro basis (e.g. prior year's planned expenditures in total v. actual, miles of levees planned v. actually constructed, etc.) or micro basis (e.g. metrics on specific projects – planned v. actual expenditures, revisions to total project budgets, revisions to completion dates, etc.). Periodic review of project costs against budgets is required to control costs, maintain quality standards, manage project progress and hold contractors accountable. There is no evidence that the CPRA has these processes in place.
- **Funding Surplus/Gap** - Funding has been and will continue to be the single most important factor in fixing our coast. Yet, the Master Plan does not quantify either how much money is available by year or what the funding gap is in any one year or in total. A plan without a funding plan is not a plan at all. We don't know if the spending proposals found in the 2018 Annual Plan (a total of \$2.45 billion for 3 years or about \$816 million per year) are consistent with the 2017 Master Plan goals or not since spending goals, which would generally follow progress on the ground, were not disclosed. However, it is clear that an average spend rate of \$816 million per year would be less than half of the amount mandated by the now 5 year old 2012 Master Plan.

### Conclusion

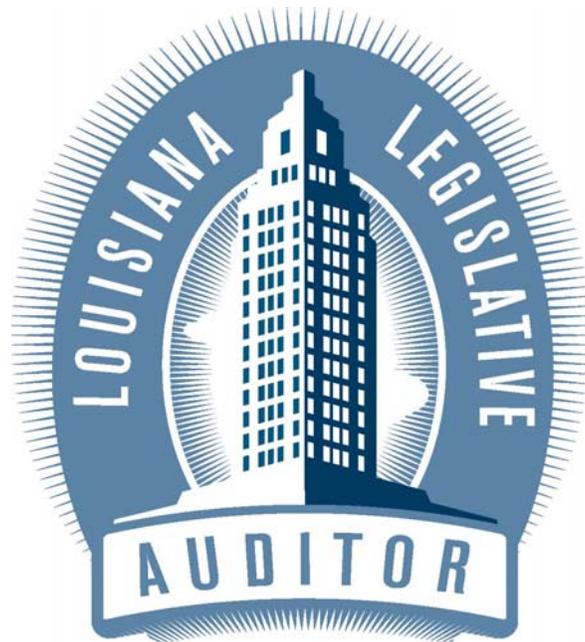
There are many ways to achieve meaningful financial reporting, transparency and accountability. Unfortunately, current plan processes and formats do not achieve those ends. The CPRA is an agency responsible for hundreds of millions of dollars in annual expenditures and the management of projects critical to the survival of South Louisiana. Yet, it has a long way to go to achieve the stewardship, accountability and transparency required of an agency with that level of responsibility.



John J. Driscoll  
Private Citizen

Attachment: Oversight of Project Funding and Outcomes – Coastal Protection and Restoration Authority, Louisiana Legislative Auditor. Issued January 20, 2016.

**OVERSIGHT OF PROJECT FUNDING AND OUTCOMES**  
**COASTAL PROTECTION AND RESTORATION AUTHORITY**



**PERFORMANCE AUDIT SERVICES**  
**ISSUED JANUARY 20, 2016**

**LOUISIANA LEGISLATIVE AUDITOR  
1600 NORTH THIRD STREET  
POST OFFICE BOX 94397  
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**DIRECTOR OF PERFORMANCE AUDIT SERVICES**  
KAREN LEBLANC, CIA, CGAP, MSW

**FOR QUESTIONS RELATED TO THIS PERFORMANCE AUDIT, CONTACT  
GINA BROWN, PERFORMANCE AUDIT MANAGER,  
AT 225-339-3800.**

Under the provisions of state law, this report is a public document. A copy of this report has been submitted to the Governor, to the Attorney General, and to other public officials as required by state law. A copy of this report is available for public inspection at the Baton Rouge office of the Louisiana Legislative Auditor.

This document is produced by the Louisiana Legislative Auditor, State of Louisiana, Post Office Box 94397, Baton Rouge, Louisiana 70804-9397 in accordance with Louisiana Revised Statute 24:513. Six copies of this public document were produced at an approximate cost of \$10.50. This material was produced in accordance with the standards for state agencies established pursuant to R.S. 43:31. This report is available on the Legislative Auditor's website at [www.la.la.gov](http://www.la.la.gov). When contacting the office, you may refer to Agency ID No. 9726 or Report ID No. 40150007 for additional information.

In compliance with the Americans With Disabilities Act, if you need special assistance relative to this document, or any documents of the Legislative Auditor, please contact Elizabeth Coxe, Chief Administrative Officer, at 225-339-3800.



LOUISIANA LEGISLATIVE AUDITOR  
DARYL G. PURPERA, CPA, CFE

January 20, 2016

The Honorable John A. Alario, Jr.,  
President of the Senate  
The Honorable Taylor Barras,  
Speaker of the House of Representatives

Dear Senator Alario and Representative Barras:

This report provides the results of our performance audit on the Coastal Protection and Restoration Authority (CPRA). The purpose of this report is to evaluate CPRA's oversight of project funding and outcomes and to identify how CPRA could help the state receive the additional funding needed to fully implement the coastal protection and restoration projects in the Master Plan.

The report contains our findings, conclusions, and recommendations. Appendix A contains CPRA's response to this report. I hope this report will benefit you in your legislative decision-making process.

We would like to express our appreciation to the management and staff of CPRA for their assistance during this audit.

Sincerely,

A handwritten signature in blue ink that reads "Daryl G. Purpera".

Daryl G. Purpera, CPA, CFE  
Legislative Auditor

DGP/aa

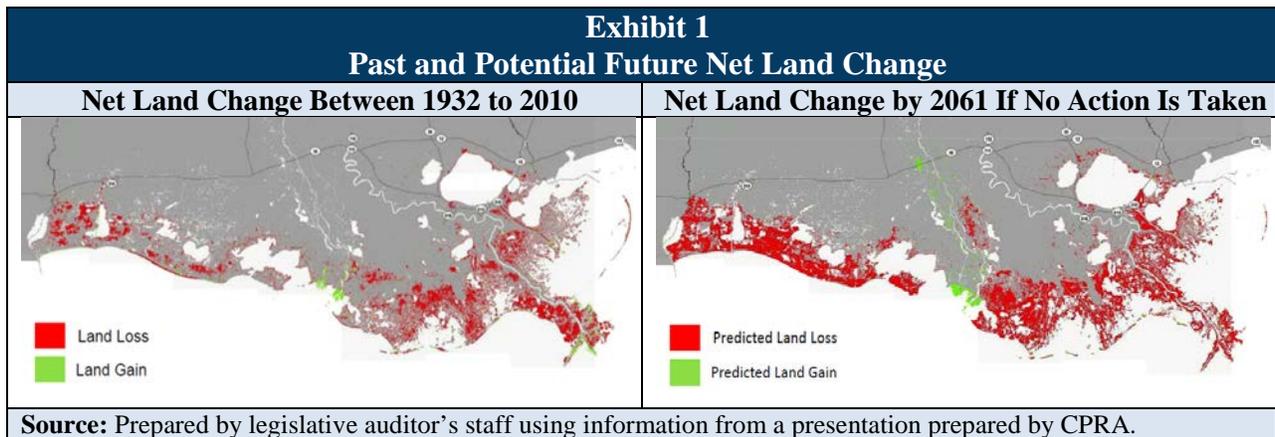
CPRA 2015



## Introduction and Summary of Findings

This report provides the results of our performance audit on the Coastal Protection and Restoration Authority (CPRA). In 2009, Act 523 created CPRA as an implementation and enforcement arm of the CPRA Board. CPRA is tasked with updating and implementing a Master Plan to address coastal issues in Louisiana. CPRA issued its first Master Plan update in 2012,<sup>1</sup> which includes a 50 year, \$50 billion budget for 109 projects that are designed to help prevent and restore coastal land loss and increase flood protection in Louisiana.

According to CPRA, since the 1930s, Louisiana has lost 1,883 square miles of land, and is currently losing land (primarily wetlands and barrier islands) at a rate of 16 square miles per year.<sup>2</sup> If no action is taken, Louisiana could lose approximately 1,765 square miles of land over the next 46 years, which equates to approximately 854,260 football fields of land or more than 10 times the land area that makes up the city of New Orleans. Exhibit 1 shows the potential land loss if no action is taken.



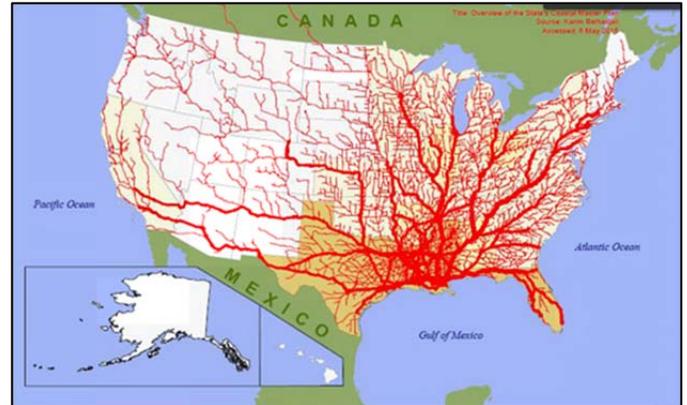
<sup>1</sup> The first Master Plan was issued in 2007 under the direction of the CPRA Board.

<sup>2</sup> Wetlands are important as they serve as storm surge barriers, which reduce the risk of flooding. Barrier islands serve as the first line of defense from storm surge by providing barriers that reduce the severity of winds and ocean waves before they reach the mainland, and they protect coastal wetlands from erosion.

Coastal protection and restoration projects are not just important to Louisiana, but also to the nation as a whole for the following reasons:

- More than \$100 billion worth of infrastructure is concentrated along Louisiana's Gulf Coast to support state and national coastal and offshore oil and gas exploration, production, transportation, and refining.
- Louisiana is among the top port states in the nation by total annual tonnage and is responsible for an average of \$134 billion in imports and exports annually, as shown in Exhibit 2.
- The lives of Louisiana residents and the preservation of its unique culture depend on the eroding wetlands and barrier islands.
- Louisiana's coastal wetlands provide habitats for multiple species of marine life.

**Exhibit 2**  
**Distribution of Cargo from Louisiana Ports**  
**throughout the United States**



**Source:** Prepared by legislative auditor's staff from a presentation prepared by CPRA.

The objective of this audit is to evaluate CPRA's oversight of project funding and outcomes and to identify how CPRA could help the state receive the additional funding needed to fully implement Master Plan projects. Overall, we found the following:

- CPRA has identified \$19.5 billion in potential funding for the \$50 billion Master Plan; however, only \$9.7 billion of this potential funding is guaranteed.
- CPRA did not account for inflation and project scope changes in its cost projections, which could increase or decrease the total estimated funding needed to complete Master Plan projects.
- Until fiscal year 2015, CPRA management was unable to determine actual state costs, including contract expenditures on a project-by-project basis. However, CPRA converted to a new accounting system in 2015 that will allow them to track actual project costs.
- CPRA has not verified that the state matches for cost-sharing projects led by the federal government are correct. Since 2008, the state's cost share for Coastal Wetlands Planning, Protection, and Restoration Act (CWPPRA) projects led by the federal government has been \$47.7 million. However, CPRA has not verified the accuracy of this amount.
- CPRA does not require that pre-construction agreements with levee districts for protection projects outline the estimated operation and maintenance costs or how

these costs will be paid. Without proper maintenance, the lifespan of projects may be shortened by the natural environment and its intended benefits may not be fully realized.

- CPRA does not evaluate whether projects are meeting the objectives in the Master Plan. This information is important because it shows whether expected results are being achieved.
- To increase the transparency of its activities, CPRA should develop a public report to communicate actual funding and expenditures and whether Master Plan objectives are being met. Showing this information may also help the state attract the additional funding it will need to fully implement its Master Plan.

Appendix A-1 contains CPRA's response to our report under the previous executive director; Appendix A-2 contains CPRA's response from the new executive director. Appendix B contains our scope and methodology, and Appendix C provides an overview of CPRA and a brief history of the agency.

**Objective: To evaluate CPRA’s oversight of project funding and outcomes and to identify how CPRA could help the state receive the additional funding needed to fully implement Master Plan projects.**

Master Plan projects are vital to the coastal issues Louisiana is facing, but they cannot be implemented without sufficient, guaranteed funding. CPRA funds its projects using a combination of federal funds, constitutionally-dedicated state funds, and one-time disaster relief funds, as shown in Exhibit 3. Appendices D and E provide more detail on the projects completed, projects still in progress, and the source of project funding. As also shown in Exhibit 3, CPRA estimates that approximately \$12.4 billion worth of coastal protection and restoration projects have been constructed or are under construction since 2008. This includes approximately \$400 million (3%) for work related to the \$50 billion Master Plan, resulting in billions of dollars of work remaining.

<b>Exhibit 3</b>			
<b>Estimated Project Costs by Funding Source</b>			
<b>Coastal Protection and Restoration Projects</b>			
<b>January 1, 2008, through June 30, 2015</b>			
<b>Funding Source</b>	<b>Constructed</b>	<b>Under Construction</b>	<b>Total</b>
State	\$1,408,558,225	\$206,457,389	<b>\$1,615,015,614</b>
Federal	6,722,997,077	3,553,208,506	<b>10,276,205,583</b>
Oil-Spill	366,840,226	147,063,587	<b>513,903,813</b>
<b>Total</b>	<b>\$8,498,395,528</b>	<b>\$3,906,729,482</b>	<b>\$12,405,125,010</b>
<b>Source:</b> Prepared by legislative auditor’s staff using information obtained from CPRA.			

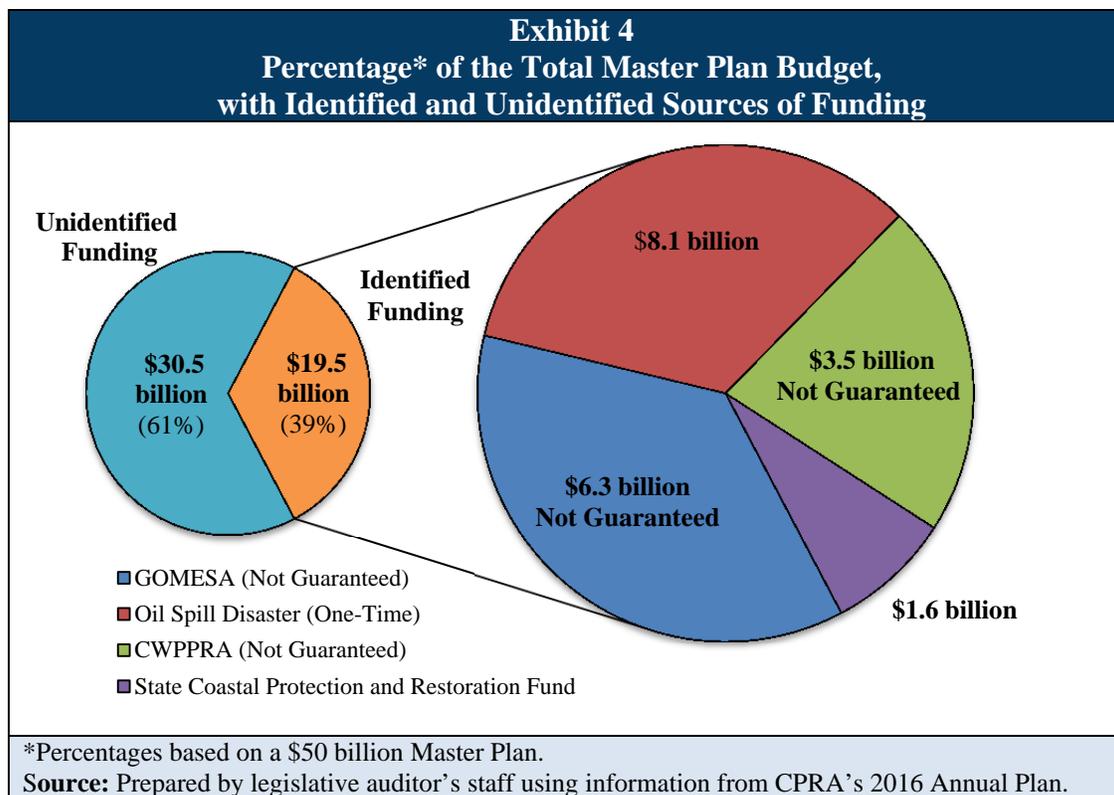
Of the \$50 billion CPRA estimates is needed to fully implement all Master Plan projects, the agency has identified as much as \$19.5 billion (39%) in potential funding. However, only \$9.7 billion of this funding is guaranteed. In addition, CPRA did not include inflation and scope increases in the Master Plan, so the amount of funding needed is likely higher. To help the state attract the additional funding it will need, CPRA should determine the actual state costs for each project and measure whether projects meet the objectives of the Master Plan. Greater transparency through public reporting of CPRA’s financial activities and project outcomes will help demonstrate that the dollars the state received were spent for their intended purpose. These areas are discussed in more detail below.

**CPRA has identified \$19.5 billion in potential funding for the \$50 billion Master Plan; however, only \$9.7 billion of this potential funding is guaranteed.**

According to CPRA, the \$50 billion estimate to implement the Master Plan represents the minimum amount required to provide Louisiana with the resources needed to significantly reduce coastal land loss and adequately reduce storm surge flood risk. Of the \$50 billion, CPRA has identified approximately \$19.5 billion (39%) in potential funding. However, only \$9.7 billion

(50%) of this potential funding is guaranteed. The \$9.7 billion in guaranteed funding consists of up to \$8.1 billion in one-time oil spill disaster funds and \$1.6 billion from the Coastal Protection and Restoration Trust Fund and interagency transfers from the Department of Transportation and Development.

The remaining \$9.8 billion in potential funding is not guaranteed and consists of \$6.3 billion from the Gulf of Mexico Energy Security Act (GOMESA) and \$3.5 billion from the Coastal Wetlands Planning Protection and Restoration Act (CWPPRA).<sup>3</sup> CPRA anticipates receiving \$140 million per year (beginning in FY 2018) from GOMESA, but this funding could be redirected by Congress for other environmental initiatives. Also, although CPRA anticipates receiving approximately \$74.2 million annually from the CWPPRA program for coastal wetlands restoration, and the program has been in effect for 25 years, it will require reauthorization by 2019 to continue. Exhibit 4 summarizes identified and unidentified sources of funding.



**Recommendation 1:** CPRA should continue to proactively identify additional sources of guaranteed revenue so that it can fully implement all Master Plan projects.

**Summary of Management's Response:** CPRA concurs with the finding and the recommendation. See Appendix A-1, page 1, for CPRA's complete response.

<sup>3</sup> This amount was based on Louisiana receiving \$140 million annually from GOMESA for 45 years, beginning in FY18, and \$74.2 million annually from CWPPRA over the next 47 years, the remaining number of years in the Master Plan's implementation timeline, at the time of this analysis.

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**CPRA did not account for inflation and project scope changes in its cost projections, which could increase or decrease the total estimated funding needed to complete Master Plan projects.**

CPRA did not include cost-increasing factors such as inflation and project scope increases when developing the Master Plan budget. As a result, the amount needed to fully fund all of its projects is likely higher. The Tulane Institute on Water Resources Law and Policy estimates<sup>4</sup> that inflation could actually cause the cost of the fully-implemented Master Plan to fall between \$94.7 billion and \$113 billion, an 89% to 126% increase in CPRA's original estimate. In addition to inflation, the projects in the Master Plan may increase in cost due to unforeseen scope increases. For example, the "Morganza to the Gulf" project has substantially increased in cost projections from \$3.96 billion to approximately \$7 billion (a 77% increase) since the Master Plan was issued in 2012. This increase is the result of a number of changes to the project, such as a 36-mile extension of the levee system.

These two cost-increasing factors are similar to what occurred with the Comprehensive Everglades Restoration Plan (CERP) in Florida, which began in 2000. The CERP began as a 30-year plan with an original price tag of \$8.2 billion. However, in its 2010 update, the budget for this plan increased by 65%, or \$5.3 billion, to \$13.5 billion due to inflation adjustments and scope changes. CPRA will have the opportunity to adjust the estimated cost of the state's Master Plan in 2017 and with each subsequent Master Plan update. In these updates, CPRA should consider amending each Master Plan's cost estimate using adjustment factors for inflation and including an allowance for increases or decreases in project scope over the years. CPRA should also clearly explain why these adjustments were made.

**Recommendation 2:** To provide more accurate estimates of the total coastal investment needed, CPRA should amend each Master Plan's cost estimate using adjustment factors for inflation and including an allowance for increases or decreases in project scope over the years. CPRA should also clearly explain why these adjustments were made.

**Summary of Management's Response:** CPRA does not concur with this finding and recommendation. According to CPRA, incorporating inflation into the cost of the projects for the 2017 Master Plan update was considered. However, after much discussion among the Master Plan team members, the decision was made to not adjust for inflation and potential project scope increases. See Appendix A-1, pages 1-2, for CPRA's complete response.

**LLA Additional Comments:** Accounting for inflation and project scope changes in Master Plan cost projections would more accurately depict the true cost of the Master Plan projects.

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<sup>4</sup> Financing the Future - Turning Coastal Restoration and Protection Plans Into Realities: The Cost of Comprehensive Coastal Restoration and Protection (2014)

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**Until fiscal year 2015, CPRA management was unable to determine actual state costs, including contract expenditures on a project-by-project basis.**

From January 1, 2008, through June 30, 2015, CPRA estimates that the state has spent \$620.6 million<sup>5</sup> in state revenue and oil-spill relief dollars for 64 completed projects and has spent or allocated another \$353.5 million<sup>6</sup> for 21 projects that are under construction.<sup>7</sup> During fiscal year 2015, CPRA had 207 contracts with a net contract amount of \$960 million for the implementation of Master Plan projects. Appendices F and G show a list of CPRA contracts in fiscal year 2015 and the total contract amount for each contractor. Services provided by these contracts include general administration services (e.g. legal), environmental services, project feasibility studies, project design services, project construction in which CPRA contracts directly for services, and agreements with local governments to provide funding for locally-led construction work. However, CPRA management could only provide estimated cost information because it was unable to determine what has actually been spent on each project.

According to CPRA, the state's accounting system it used prior to 2015 did not allow it to record expenditure information on a project-by-project basis. Although project managers assigned to each project track contract expenditures for their projects, CPRA management was not able to calculate costs for all projects using its accounting system. CPRA recognized the state's accounting system as a limitation to reporting cost on a project-by-project basis and was one of the first agencies to convert its financial accounting system to LaGov. This new system allows CPRA to account for actual expenditures on each project.

**Recommendation 3:** CPRA should record how much has been spent on a project-by-project basis for coastal protection and restoration, including how much has been spent on contracts for each project.

**Summary of Management's Response:** CPRA concurs with the finding and recommendation. See Appendix A-1, page 2, for CPRA's complete response.

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<sup>5</sup> As shown in Exhibit 3 on page 4 of this report, State Constructed amount (\$1,408,558,225) + Oil-Spill Constructed amount (\$366,840,226) - \$1,154,847,077 (not shown in Exhibit 3). The approximately \$1.15 billion represents the state's obligation (excluding interest) of HSDRRS projects that it has not yet begun to repay.

<sup>6</sup> As shown in Exhibit 3 on page 4 of this report, State Under Construction amount (\$206,457,389) + Oil-Spill Under Construction amount (\$147,063,587).

<sup>7</sup> The total estimated cost of these projects is \$12.4 billion, as stated in Exhibit 3. However, the federal government is responsible for the majority of this cost, and CPRA cannot track most of these expenses.

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**CPRA has not verified that the state matches for cost-sharing projects led by the federal government are correct.**

Projects can be fully funded by the state, fully funded by a federal sponsor, or funded through cost-share agreements between the state and a federal sponsor. Currently, CPRA is only able to verify that the state's share is correct when CPRA is the project lead. However, if a federal sponsor (e.g. the United States' Army Corps of Engineers) leads a project, it pays for most expenditures up front and seeks reimbursement from the state for the balance of its share upon completion. To inform the state of its share, the federal government either sends an annual report or a letter to CPRA that includes how much the state owes for certain projects. However, CPRA has not verified that the matching amounts the state owes are correct. According to CPRA management, it has limited ability to see the details of the federal government's expenditures, even though it has requested this information in the past. Specifically, CPRA has requested information for the Louisiana Coastal Area (LCA) program,<sup>8</sup> but no projects under this program have entered the construction phase. CPRA has not, however, requested this information in an attempt to verify the state's match for projects under the CWPPRA program. As of December 2015, this is the only program CPRA is cost-sharing with the federal government for construction projects that have been completed.

The federal government is the lead for some projects that fall under the CWPPRA program and all of the Hurricane Storm Damage Risk Reduction System (HSDRRS) projects. These federally-led cost-share projects were estimated to cost approximately \$3.6 billion over the last 7.5 years, with the state's share ranging from approximately 15% to 35%. Since 2008, the state's cost share for CWPPRA projects led by the federal government has been \$47.7 million. However, CPRA has not verified the accuracy of this amount. The state has not started paying back the amount owed for HSDRRS projects, which amounts to \$2.95 billion with interest over a payback period of 30 years beginning in 2019. HSDRRS contracts between the state and federal sponsors require each party to provide the other with any information or documents concerning the federally-led projects as soon as possible. As a result, CPRA has the opportunity to verify the state's share for the HSDRRS program before making any payment to the federal government.<sup>9</sup>

**Recommendation 4:** CPRA should obtain actual cost information for federally-led projects from its federal partners so that it can verify that it is paying the correct match.

**Summary of Management's Response:** CPRA partially concurs with the finding and the recommendation. According to CPRA, it has historically had difficulty with obtaining expenditure detail from its federal sponsors, because they have been unwilling to provide it even though CPRA has requested it. According to CPRA, it is making progress with the LCA program, and will be more aggressive with its efforts to obtain the detail from the federal sponsors to completely verify the costs of the federal sponsor. See Appendix A-1, page 2, for CPRA's complete response.

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<sup>8</sup> Since this program is currently conducting feasibility studies and has not entered the construction phase, it was excluded from the projects we evaluated.

<sup>9</sup> CPRA has asked LLA for assistance with verifying the accuracy of the state's cost share for work conducted by the United States Army Corps of Engineers. LLA is exploring this request.

**LLA Additional Comments:** Although CPRA has requested federal cost information from the Corps of Engineers for the LCA program, it has not requested this information for the CWPPRA program which was the only program CPRA was cost-sharing at the time of our audit.

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**CPRA does not require that pre-construction agreements with levee districts for protection projects outline the estimated operation and maintenance costs or how these costs will be paid.**

Operations and maintenance (O&M) is the final phase<sup>10</sup> of a protection or restoration project. Projects require routine and major maintenance to ensure that they maintain the level of condition necessary to continue to achieve their intended purpose. Without proper maintenance, the lifespan of projects may be shortened by the natural environment and their intended benefits may not be fully realized. Specifically, for structural protection projects,<sup>11</sup> the lack of sufficient maintenance may lead to decreased flood protection and increased risk to lives and property. This could require reconstruction of the same Master Plan project in the future. In addition, if the O&M requirements for projects are not met before a disaster occurs, the federal government may deny requests for reimbursement, and local citizens may have to be responsible for the repair costs. Furthermore, flood insurance rates set by FEMA may subsequently increase in some areas, causing a larger financial burden on local communities.

After the completion of protection projects, the O&M responsibilities are passed down to the local governments and levee districts based on state laws and intergovernmental agreements signed between CPRA and levee districts before construction begins.

**Outlining the estimated O&M cost and how it will be paid in the pre-construction intergovernmental agreement (IGA) may help levee districts better prepare for these future costs.** Because levee districts are required to operate and maintain protection projects once completed,<sup>12</sup> they must sign an IGA with CPRA stating it will be their sole responsibility to “operate, maintain, repair, replace, and rehabilitate completed projects.” However, CPRA does not require that this agreement include the estimated O&M cost or require districts to actually show a plan of action and timeline for how funding will be secured. Because districts may have to obtain additional revenue through flood protection millage increases to maintain federal compliance, including this information in the IGA may help prevent projects from falling out of compliance with federal standards due to lack of funding after the project is completed. For example, on November 21, 2015, Jefferson Parish voters rejected a 5.5-mil property tax increase that would have provided funding to maintain and operate the West Bank’s flood protection system.

<sup>10</sup>Typical project phases include planning, engineering and design, construction, and operation and maintenance.

<sup>11</sup> In the Master Plan, protection projects are defined as either structural or non-structural. Structural projects include levees, concrete walls, flood gates, and pumps. Non-structural projects include risk reduction measures such as elevating or flood-proofing buildings.

<sup>12</sup> Restoration projects also need O&M, but these costs are comparably smaller and typically covered by the state or federal government.

Of the 109 projects in the 2012 Master Plan, 15 protection projects will require levee districts to pay for major O&M costs. As of November 2015, only two of these projects had entered the construction phase. This gives CPRA an opportunity to start requiring levee districts to show how they will pay for O&M costs when the IGA is signed. Exhibit 5 summarizes the 15 protection projects that will require local levee districts to pay for their O&M costs.

<b>Exhibit 5 - Master Plan Structural Protection Project List</b>				
<b>Protected Area* (by Levee District)</b>	<b>Project Names</b>	<b>Population</b>	<b>Estimated Cost of Projects</b>	<b>Per Capita Cost of Project</b>
Lafitte and Vicinity	1. Lafitte Ring Levee	7,000**	\$870,000,000	\$124,286
St. Mary Parish	2. Amelia Levee Improvements (3E)	54,650	\$1,703,000,000	\$31,162
	3. Morgan City Back Levee			
	4. Bayou Chene Floodgate			
	5. Berwick to Wax Lake			
	6. Franklin and Vicinity			
Terrebonne and Lafourche Parish	7. Morganza to the Gulf (high)*** <i>(has entered the construction phase)</i>	208,178	\$3,964,000,000	\$19,041
Vermilion and Iberia Parish	8. Abbeville and Vicinity	131,239	\$2,307,000,000	\$17,579
	9. Iberia/Vermilion Upland Levee			
St. John the Baptist Parish	10. Greater New Orleans LaPlace Extension	45,924	\$457,000,000	\$9,951
GNO/SLFPA - E	11. Greater New Orleans High Level	623,508	\$1,611,000,000	\$2,584
Lafourche Parish	12. Maintain Larose to Golden Meadow <i>(has entered the construction phase)</i>	96,318	\$228,000,000	\$2,367
GNO/SLFPA-W	13. Maintain West Bank Levees	179,571	\$193,000,000	\$1,075
St. Tammany Parish	14. Lake Ponchartrain Barrier	233,740	\$157,000,000	\$672
	15. Slidell Ring Levee			
<p><b>Source:</b> Prepared by legislative auditor’s staff using 2012 Master Plan and 2010 Census Data.                      *These protected areas were selected based on the geographic area(s) that contain the majority of the structural protection projects listed. However, some projects cross over into one or more additional areas. Information regarding the actual area(s) and population(s) that will be responsible for these costs is not yet available.                      ** Estimation provided by Lafitte Area Independent Levee District personnel.                      *** This reflects a single project – Morganza to the Gulf – which has increased to almost \$7 billion, which is not reflected in the Master Plan.</p>				

As shown in Exhibit 5, some of the most expensive projects will have to be maintained by a smaller population compared to projects that have a larger tax base. For example, St. Mary Parish has a population of approximately 54,650, but will be responsible for maintaining \$1.7 billion worth of protection projects to provide greater flood protection for the area. Including the estimated O&M costs and how it will be funded in the IGA is important because, as seen in Exhibit 5, small tax bases in some local levee districts could result in districts struggling to find the resources to maintain completed and future projects.

**Recommendation 5:** CPRA should require that IGAs with local entities outline estimated costs for operation and maintenance. The IGA should also require that local entities include a plan of action and timeline for how the funding will be secured.

**Summary of Management’s Response:** CPRA concurs with the finding and recommendation. See Appendix A-1, page 3, for CPRA’s complete response.

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### **CPRA does not evaluate whether projects are meeting the objectives in the Master Plan.**

As coastal protection and restoration funding is invested in projects to address Louisiana’s coastal needs, it is important for CPRA to show outcomes the state received in return for the money spent, such as increased flood protection and whether these outcomes meet the Master Plan’s objectives. While CPRA does pre-screen projects through computer modeling to determine whether these projects will align with the Master Plan objectives, CPRA has not yet developed measurements to evaluate whether projects are meeting the Master Plan’s objectives as the projects are completed. Exhibit 6 shows the Master Plan objectives.

CPRA management currently uses two performance indicators to report the results of coastal protection and restoration projects in the Executive Budget and their annual plan. These indicators are “*Acres Directly Benefited by Projects Constructed*” and “*Miles of Levee Improved by Project being Constructed.*”

#### **Exhibit 6 2012 Master Plan Objectives**

1. **Flood Protection** - Reduce economic losses from storm surge based flooding to residential, public, industrial, and commercial infrastructure.
2. **Natural Processes** - Promote a sustainable coastal ecosystem by harnessing the natural processes of the system.
3. **Coastal Habitats** - Provide habitats suitable to support an array of commercial and recreational activities coast-wide.
4. **Cultural Heritage** - Sustain the unique cultural heritage of coastal Louisiana by protecting historic properties and traditional living cultures and their ties and relationships to the natural environment.
5. **Working Coast** - Promote a viable working coast to support regionally- and nationally-important businesses and industries.

**Source:** Prepared by legislative auditor’s staff using the 2012 Master Plan.

Although CPRA projects have created or improved 27,457 acres of land and 264 miles of levees, it has not reported on the impact these acres and miles have had on achieving the Master Plan's objectives. For example, although the "acres benefited" indicator may show that the state has gained land from completed projects, it does not show if the state's net land gain or loss over a given period of time has improved and how it benefits the coast and residents.

Good outcome performance indicators<sup>13</sup> should measure results and assess impact and effectiveness. These indicators are important because they show whether expected results are being achieved. CPRA should consider measuring Master Plan objectives by creating interim performance targets, comparing indicator results over time, and developing a mix of scientific indicators that can be easily understood by other third-party stakeholders as the projects are being completed. While CPRA has listed indicators on net land gained and reductions in expected annual damage in its strategic plan, it has not begun to calculate or report these indicators and these alone are not sufficient to show that all objectives of the Master Plan are being met. Therefore, CPRA should be proactive in developing indicators that measure project outcomes and how those outcomes address the Master Plan's objectives. This would help the state attract the additional financial support it needs to fully implement the Master Plan.

**Recommendation 6:** CPRA should measure whether its projects are meeting the Master Plan's objectives.

**Summary of Management's Response:** CPRA partially concurs with the finding and recommendation. According to CPRA, all projects are vetted through a rigorous evaluation to determine if it will meet one or more master plan objectives. See Appendix A-1, page 3, for CPRA's complete response.

**LLA Additional Comments:** While CPRA does pre-screen projects through computer modeling to determine whether these projects will align with the Master Plan objectives, CPRA has not yet developed measurements to evaluate whether projects are actually meeting the Master Plan's objectives as the projects are completed. CPRA should consider measuring Master Plan objectives by creating interim performance targets, comparing indicator results over time, and developing a mix of scientific indicators that can be easily understood by other third-party stakeholders.

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**To increase the transparency of its activities, CPRA should develop a public report to communicate actual funding and expenditures and whether Master Plan objectives are being met.**

Per state law (R.S. 49:214), CPRA issues an annual report each year that includes a three-year funding projection and a description and status of all projects pertaining to integrated coastal protection. However, this annual report does not show actual funding and expenditures or how the coastal protection and restoration projects meet the objectives of the Master Plan. To

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<sup>13</sup> Per Manageware, the state's "how to" guide for its performance-based budgeting process.

increase its transparency, CPRA should develop a report that includes this information. Providing this information may also help the state attract the additional funding it will need to fully implement its Master Plan.

Stakeholders we met with stated that public reporting is important to demonstrate accountability for funds. As the Public Affairs Research Council reported in 2014, it is likely that the state is being watched closely by Congress and stakeholder organizations to determine how responsible and transparent it will be with the coastal funding it currently has and the funding it will begin to receive in the relatively near future. If stakeholders could evaluate the details of how coastal funds were spent, this may increase the confidence that these funds are being used properly.

As an example of reporting actual funding and expenditures for such a large scale initiative, Florida's Comprehensive Everglades Restoration Plan (CERP) developed an annual report that includes detailed, actual prior-year budget information for both state and federal funding sources. Also, to determine and communicate how well restoration goals are being met, CERP developed a set of system-wide ecological indicators that demonstrate how the ecosystem is responding to restoration and management activities. These indicators are reported every two years.

**Recommendation 7:** CPRA should develop a public report, either in the annual plan or in a separate report, communicating actual project funding and expenditures, as well as how Master Plan objectives are being met.

**Summary of Management's Response:** CPRA concurs with the finding and recommendation. See Appendix A-1, page 3, for CPRA's complete response.

**Matter for Legislative Consideration:** Similar to Florida, the legislature may want to consider requiring that CPRA report on its progress toward meeting the Master Plan's objectives.

## **APPENDIX A: MANAGEMENT'S RESPONSE**



# State of Louisiana

**BOBBY JINDAL**  
GOVERNOR

January 5, 2016

Daryl G. Purpera, CPA, CFE  
Louisiana Legislative Auditor  
P.O. Box 94397  
Baton Rouge, LA 70804

RE: Performance Audit – Coastal Protection and Restoration Authority

Dear Mr. Purpera:

Your staff recently conducted a Performance Audit on the Coastal Protection and Restoration Authority. We have reviewed the report and provide the following response to each finding and recommendation.

**Finding #1:** CPRA has identified \$19.5 billion in potential funding for the \$50 billion Master Plan; however, only \$9.7 billion of this identified funding is guaranteed.

**Recommendation #1:** CPRA should continue to proactively identify additional sources of guaranteed revenue so that it can fully implement all Master Plan projects.

- CPRA concurs with the finding and the recommendation.

**Finding #2:** CPRA did not account for inflation and project scope changes in their cost projections which could increase or decrease the total estimated funding needed to complete Master Plan projects.

**Recommendation #2:** To provide more accurate estimates of the total coastal investment needed, CPRA should amend each Master Plan's cost estimate using adjustment factors for inflation and including an allowance for increases or decreases in project scope over the years. CPRA should also clearly explain why these adjustments were made.

- CPRA does not concur with this finding and recommendation. During the audit process, we explained to the audit team that incorporating inflation into the cost of the projects for the 2017 Master Plan update was considered. However, after much discussion among the Master Plan team members, the decision was made to not adjust for inflation and potential project scope increases for the following reasons:
  - The \$50 billion dollar figure is intended as a funding constraint rather than a price tag for coastal restoration and protection. Enforcing this realistic constraint allows for the prioritization of projects within a reasonable budget.
  - Implementation of the Master Plan occurs by funding individual projects within the plan as dollars become available.

## Executive Division

Mr. Purpera  
 January 5, 2016  
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- Master Plan project cost estimates are based on real data from current projects. New cost data is incorporated into the five year update and cost estimates are adjusted accordingly.
- Over a planning horizon of 50 years, it is difficult to account for factors such as improvements in technology, market competition (dredging) or other advancements that could drive project costs down.
- During the ongoing 2017 Master Plan development, we will communicate in the Master Plan the decisions made regarding incorporation of inflation and potential project scope increases so that all interested parties have a clear understanding.

**Finding #3:** Until fiscal year 2015, CPRA management was unable to determine actual state costs, including contract expenditures on a project-by-project basis. However, CPRA converted to a new accounting system in 2015 which will allow them to track actual project costs.

**Recommendation #3:** CPRA should use LaGov to record how much has been spent on a project-by-project basis for coastal protection and restoration including how much has been spent on contracts for each project.

- CPRA concurs with the finding and the recommendation. We will utilize the LaGov accounting system to the fullest extent available to us. Reporting expenditures by project and by funding source is essential, and CPRA is committed to increased transparency on project expenditures.

**Finding #4:** CPRA has not verified that the state matches for cost sharing projects led by the Federal government are correct.

**Recommendation #4:** CPRA should obtain actual cost information for federally led projects from its federal partners so that it can verify that it is paying the correct match.

- CPRA partially concurs with the finding and the recommendation. CPRA has historically had difficulty with obtaining expenditure detail from its federal sponsors, because they have been unwilling to provide it. Therefore, it is not as simple as stated in the finding. As explained to the audit team, CPRA has limited ability to see the details of the Federal government's expenditures even though it has been requested by CPRA. We are making progress with the LCA program, and will certainly be more aggressive with our efforts to obtain the detail from the federal sponsors to completely verify the costs of the federal sponsor. CPRA cannot force the federal sponsors provide the detailed information.
- CPRA has engaged the Legislative Auditor's Office to audit the Corps of Engineers' expenditures on the Hurricane Storm Damage Risk Reduction System, which is a cost-share arrangement. It is not yet known if we will be able to gain access to the Corp's records.

Mr. Purpera  
January 5, 2016  
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**Finding #5:** CPRA does not require that pre-construction agreements with levee districts for protection projects outline the estimated operation and maintenance costs or how these costs will be paid.

**Recommendation #5:** CPRA should require that intergovernmental agreements (IGA) with local entities outline estimated costs for operation and maintenance. The IGA should also require that local entities include a plan of action and timeline for how the funding will be secured.

- CPRA concurs with the finding and recommendation. We will begin working with the levee districts to incorporate an estimate for operation and maintenance costs as well as a plan of action and timeline for the district to secure appropriate funding.

**Finding #6:** CPRA does not evaluate whether projects are meeting the objectives in the Master Plan.

**Recommendation #6:** CPRA should measure whether their projects are meeting the Master Plan's objectives.

- CPRA partially concurs with the finding and recommendation. As stated in the report, "While CPRA does pre-screen projects through computer modeling to determine whether these projects will align with the Master Plan objectives, CPRA has not yet developed measurements to evaluate whether projects are meeting the Master Plan's objectives, as shown in Exhibit 6." All projects are vetted through a rigorous evaluation to determine if it will meet one or more master plan objectives.
- There is an evaluation process during Master Plan development that helps us understand a project's ability to meet the master plan objectives. Project ideas are first evaluated based on preliminary screening criteria which include size threshold, geographic area, adequate information, consistency with Master Plan principles and objectives, and duplicative effects.
- This preliminary screening process results in a list of candidate projects. The candidate projects are then modeled and evaluated on their ability to build and maintain land and reduce damages from storm surge. The projects are also evaluated through the use of decision criteria, which are tied directly to the five objectives of the master plan. The results of this technical analysis and feedback from the public inform which projects best meet the Master Plan objectives and are, therefore, included in the plan.

**Finding #7:** To increase the transparency of their activities, CPRA should develop a public report to communicate actual funding and expenditures and whether Master Plan objectives are being met.

**Recommendation #7:** CPRA should develop a public report, either in the annual plan or in a separate report, communicating actual project funding and expenditures as well as how Master Plan objectives are being met.

- CPRA concurs with the finding and recommendation. Our new financial system will provide us the ability to report this information either online or in a report.

Mr. Purpera  
January 5, 2016  
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We value the experience of the audit process and view it as an opportunity to discover ways to improve our methods of doing business. We fully appreciate the time and effort the audit team spent to conduct this audit and meet with many CPRA staff to understand the operations of the agency. We believe the observations noted by the auditors will be helpful to us as we move forward with implementing the Master Plan projects.

Should you have any questions or need additional information regarding our response, please contact me or Janice Lansing, Chief Financial Officer, at 342-7308. We look forward to working with you and your staff again.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Graham', with a long horizontal flourish extending to the right.

Kyle Graham  
Executive Director

c: Janice Lansing, Chief Financial Officer



# State of Louisiana

JOHN BEL EDWARDS  
GOVERNOR

January 15, 2016

Daryl G. Purpera, CPA, CFE  
Louisiana Legislative Auditor  
P.O. Box 94397  
Baton Rouge, LA 70804

RE: Performance Audit – Coastal Protection and Restoration Authority

Dear Mr. Purpera:

Your staff recently conducted a Performance Audit on the Coastal Protection and Restoration Authority, for which a response was provided by the previous Executive Director. As the new Executive Assistant to Governor John Bel Edwards for Coastal Activities, I have reviewed the report and am writing to provide my comments.

We also value the audit process and view it as an opportunity to discover ways to improve an agency's methods of doing business. It appears to me that the observations noted by the auditors will be helpful to us as we move forward with implementing the Master Plan projects. We plan to take each finding and recommendation seriously and to take the appropriate actions to address them. The Coastal Protection and Restoration Authority is committed to operating as efficiently and effectively as possible, and these audit findings will allow for Master Plan projects to be implemented in a more timely, cost effective, and transparent manner.

Thank you for the opportunity to respond. I look forward to working with you and your staff in the future.

Sincerely,

Johnny Bradberry  
Executive Assistant - Coastal Activities

c: Janice Lansing, Chief Financial Officer

## APPENDIX B: SCOPE AND METHODOLOGY

We conducted this performance audit under the provisions of Title 24 of the Louisiana Revised Statutes of 1950, as amended. The purpose and objective of this report is to evaluate the Coastal Protection and Restoration Authority’s (CPRA) oversight of coastal project funding and outcomes, and to identify how CPRA could help the state receive the additional funding support needed to fully implement the Coastal Master Plan projects. Our audit covered coastal protection and restoration projects completed since the Master Plan was first issued in 2007, projects that are currently under construction, and projects that will be implemented as part of the Master Plan.

We conducted this performance audit in accordance with generally-accepted government auditing standards issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide reasonable basis for our findings and conclusions based on our audit objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. To answer our objective, we reviewed internal controls relevant to the audit objective and performed the following audit steps:

- Reviewed the Master Plan and interviewed CPRA staff to discuss the coastal issues that Louisiana is facing and the importance of Louisiana’s coast.
- Reviewed applicable federal and state laws regarding the history of the federal and state governments’ efforts in protecting and restoring Louisiana’s coast.
- Conducted site visits with CPRA staff to observe different types of projects to understand why these projects are necessary and how they contribute to the protection and restoration of Louisiana’s coast.
- Reviewed CPRA’s Internal Monthly Progress Reports and annual reports to identify a list of projects that have been completed since 2007 and projects that are currently under construction.
- Used the Master Plan “Crosswalk” provided by CPRA (which includes a list of initiated Master Plan projects) to determine the implementation status of the \$50 billion, 50-year Master Plan.
- Researched funding sources that are significant to the implementation of the Master Plan and calculated the total percentage of the \$50 billion Master Plan that could be covered by these potential funding amounts.
- Researched the possible effect of inflation on the overall cost of the Master Plan.

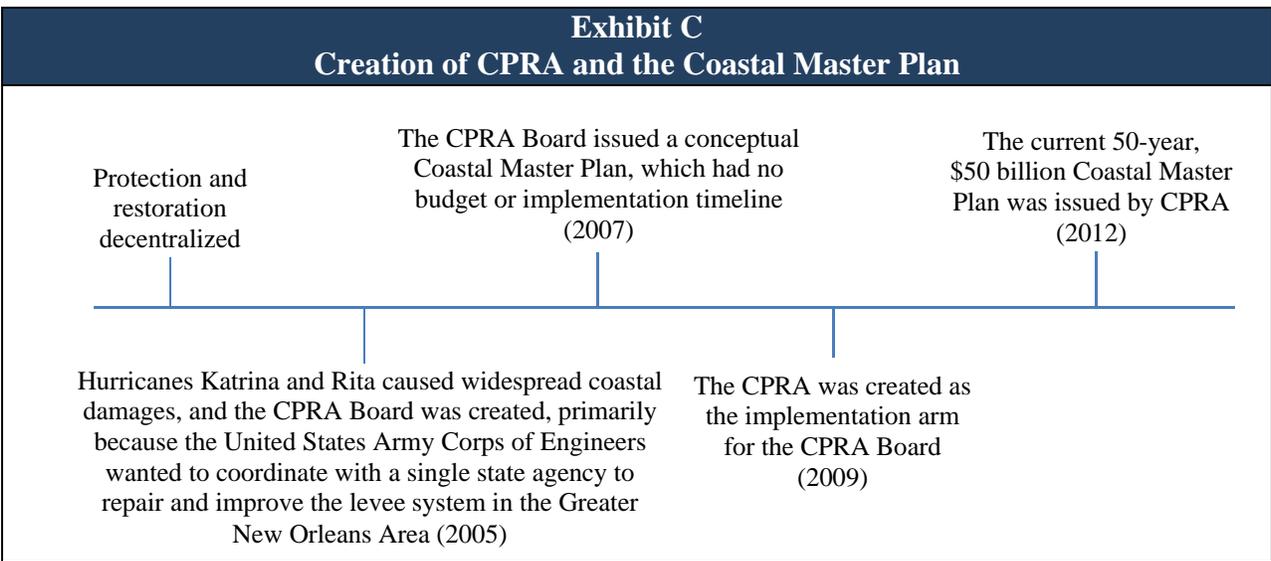
- Researched Florida's Comprehensive Everglades Restoration Plan (CERP) and determined how inflation and scope changes increased the overall cost of Florida's restoration plan.
- Compared the projected project costs and populations of areas with proposed structural protection projects to identify potential difficulties smaller parishes may have in funding the operations and maintenance costs.
- Reviewed the Executive Budget documents, CPRA's Internal Monthly Progress Reports, CPRA's Annual Plans, CPRA's Strategic Plan, and Master Plan, and interviewed CPRA staff to determine if Master Plan objectives are measured.
- Researched best practices from Florida's CERP.

## APPENDIX C: OVERVIEW AND HISTORY OF CPRA

**Overview of CPRA.** During fiscal year 2015, CPRA had total expenditures of \$286 million. Of these expenditures, \$20.3 million (7%) was for administration, \$230.6 million (81%) was for construction projects, and \$35.1 million (12%) was for non-construction projects such as the development of a coastal monitoring system. CPRA had 169 staff and 207 contracts to oversee and implement projects during fiscal year 2015. These contracts have a net contract amount of \$960 million.

**History of CPRA.** In response to the devastation of hurricanes Katrina and Rita, the federal government agreed to partner with Louisiana to rebuild and improve the levee system around New Orleans if there was a single state agency to coordinate efforts and develop a plan of action to address the state’s coastal issues. In 2005, the legislature created a single oversight authority called the Coastal Protection and Restoration Authority Board (Board) and tasked the Board with developing and implementing a comprehensive coastal protection and restoration Master Plan for the state.

The Board issued the first Master Plan in 2007 with no budget or implementation timeline. In 2009, Act 523 created the Coastal Protection and Restoration Authority (CPRA), an implementation arm of the Board, through consolidation of restoration and protection personnel, primarily from the Department of Natural Resources and the Department of Transportation and Development. The Board tasked CPRA with updating the Master Plan, resulting in CPRA issuing its first updated Master Plan in 2012. The plan must be updated every five years. The development of the Master Plan represented the beginning of an estimated \$50 billion, 50-year coastal protection and restoration plan. Exhibit C below illustrates these events.



**Source:** Prepared by legislative auditor’s staff using information provided by CPRA.

## APPENDIX D: PROTECTION AND RESTORATION PROJECTS COMPLETED (JANUARY 2008-JUNE 2015)

Project (Master Plan Related Project Highlighted in Yellow)	Date Completed	Location (Parish)	Source of Funding	Total Estimated Cost	Acres/Miles Improved
<b>Barrier Island (BI) / Headland Restoration (HR)</b>					
Emergency Barrier Berms	4/19/2011	St. Bernard, Plaquemines	Oil Spill	\$251,000,000	1,417 acres
Caminada Headland Beach and Dune Restoration	12/29/2014	Lafourche	CIAP (Federal)	70,679,580	303 acres
Riverine Sand Mining/Scofield Island Restoration	8/14/2013	Plaquemines	Oil Spill	60,839,484	606 acres
Pelican Island and Pass La Mer to Chalant Pass Restoration	11/28/2012	Plaquemines	CWPPRA (Federal/State Cost Share)	52,893,695	1,117 acres
Shell Island East-BERM	8/16/2014	Plaquemines	Oil Spill	47,679,580	307 acres
Cameron Parish Shoreline Restoration	4/22/2014	Cameron	State	45,800,000	523 acres
West Belle Pass Barrier Headland Restoration	11/23/2012	Lafourche	CWPPRA	39,422,093	389 acres
Pass Chalant to Grand Bayou Pass Barrier Shoreline Restoration	6/11/2009	Plaquemines	CWPPRA	37,023,827	359 acres
Whiskey Island Back Barrier Marsh Creation	10/30/2009	Terrebonne	CWPPRA	26,831,855	270 acres
East Grand Terre	11/11/2010	Jefferson	CIAP, State Surplus Funds	25,426,247	683 acres
<b>BI/HR Total</b>				<b>\$657,596,361</b>	<b>5,974 acres</b>
<b>Diversion</b>					
Bayou Lafourche Freshwater Introduction	10/5/2011	Lafourche	State Surplus	\$20,000,000	
<b>Diversion Total</b>				<b>\$20,000,000</b>	
<b>Hydrologic Restoration</b>					
Penchant Basin Natural Resources Plan, Increment 1	12/15/2011	Terrebonne	CWPPRA	\$18,878,814	675 acres
MRGO Closure Structure	7/20/2009	St. Bernard	Federal Hurricane Relief	14,116,500	2,343 acres
Cameron-Creole Levee Maintenance	6/6/2011	Cameron	CWPPRA	13,850,000	2,602 acres
East Sabine Lake Hydrologic Restoration	8/11/2009	Cameron	CWPPRA	6,864,413	281 acres
Black Bayou Culverts Hydrologic Restoration	1/1/2010	Cameron	CWPPRA	6,641,125	540 acres

<b>Project (Master Plan Related Project Highlighted in Yellow)</b>	<b>Date Completed</b>	<b>Location (Parish)</b>	<b>Source of Funding</b>	<b>Total Estimated Cost</b>	<b>Acres/Miles Improved</b>
South Lake Decade Freshwater Introduction	7/12/2011	Terrebonne	CWPPRA	\$6,473,826	202 acres
Coastal Wetlands - Riverbend	1/31/2015	St. Bernard	CIAP	2,000,000	346 acres
<b>Hydrologic Restoration Total</b>				<b>\$68,824,678</b>	<b>6,989 acres</b>
<b>Marsh Creation</b>					
Dedicated Dredging on the Barataria Land Bridge	4/15/2010	Jefferson	State, CWPPRA, CIAP	\$36,281,893	2,800 acres
Mississippi River Sediment Delivery System - Bayou Dupont	5/20/2010	Jefferson, Plaquemines	CWPPRA, ARRA (Federal)	26,797,363	577 acres
Goose Point/Point Platte Marsh Creation	2/12/2009	St. Tammany	CWPPRA	22,117,777	436 acres
Black Lake Supplemental Beneficial Use Disposal Area	12/17/2010	Cameron	State	21,034,329	440 acres
Sabine Refuge Marsh Creation, Cycle 2	8/31/2010	Cameron	CWPPRA	17,750,000	
East Marsh Island Marsh Creation	1/19/2011	Iberia	CWPPRA	14,617,792	1,159 acres
Fringe Marsh Repair	1/17/2014	Plaquemines	CIAP	8,756,606	300 acres
NRDA Lake Hermitage Marsh Creation INCR2	12/5/2014	Plaquemines	Oil Spill	7,321,162	101 acres
Beneficial Use 2008 - Sabine Cycle	5/14/2010	Cameron	State	6,636,312	227 acres
Marsh Creation Near Freshwater Bayou	6/10/2015	Vermilion	State	5,700,000	96 acres
Dedicated Dredging - Point au Fer	1/15/2008	Terrebonne	State	2,469,250	67 acres
<b>Marsh Creation Total</b>				<b>\$169,482,484</b>	<b>6,203 acres</b>
<b>Oyster Barrier Reef</b>					
Bioengineered Oyster Reef	2/15/2012	Cameron	CWPPRA	\$1,510,433	5 acres
<b>Oyster Barrier Reef Total</b>				<b>\$1,510,433</b>	<b>5 acres</b>
<b>Other</b>					
Bayou Lafourche Fresh Water District - Walter S. Lemann Memorial Pump Station Renovations	10/6/2014	Ascension	Federal Hurricane Disaster	\$3,194,355	
Sediment Containment System for Marsh Creation Demonstration	8/21/2013	St. Charles	CWPPRA	2,323,073	3 acres
Enhancement of Barrier Island Vegetation Demonstration	10/14/2011	Terrebonne	CWPPRA	2,169,264	
CIAP Performance Evaluation - Rockefeller Refuge Performance Monitoring	4/23/2012	Cameron, Vermilion	CIAP	404,637	
Lost Lake Vegetation Project	6/14/2011	Terrebonne	Federal	161,000	
<b>Other Total</b>				<b>\$8,252,329</b>	<b>3 acres</b>

<b>Project (Master Plan Related Project Highlighted in Yellow)</b>	<b>Date Completed</b>	<b>Location (Parish)</b>	<b>Source of Funding</b>	<b>Total Estimated Cost</b>	<b>Acres/Miles Improved</b>
<b>Shoreline Protection</b>					
North Lake Mechant Landbridge Restoration	12/16/2009	Terrebonne	CWPPRA	\$40,254,428	604 acres
Barataria Basin Landbridge Shoreline Protection, Phase 1 and 2	3/5/2009	Jefferson	CWPPRA	32,538,623	1,304 acres
Orleans Land Bridge SP and Marsh Creation	6/3/2013	Orleans	CIAP	30,420,000	140 acres
Jonathan Davis Wetland Protection	1/12/2012	Jefferson	CWPPRA	30,136,616	510 acres
Lake Borgne Shoreline Protection	6/18/2009	St. Bernard	CWPPRA	26,793,123	229 acres
Biloxi Marsh	7/8/2014	St. Bernard	State	22,000,000	110 acres
Raccoon Island Shoreline Protection/Marsh Creation Project	4/25/2013	Terrebonne	CWPPRA	21,364,793	16 acres
West Lake Boudreaux Shoreline Protection and Marsh Creation	12/8/2008	Terrebonne	CWPPRA	19,143,813	145 acres
South Shore of the Pen Shoreline Protection and Marsh Creation	5/8/2012	Jefferson	CWPPRA	17,475,047	211 acres
Freshwater Bayou Bank Stabilization (CIAP)	6/9/2014	Vermilion	CIAP	13,568,804	223 acres
GIWW Bank Restoration of Critical Areas in Terrebonne	3/24/2014	Terrebonne	CWPPRA	13,022,245	345 acres
Grand Lake Shoreline Protection	1/26/2010	Cameron	CIAP	9,912,919	495 acres
Rockefeller Refuge Gulf Shoreline Stabilization Demonstration Project	10/26/2009	Cameron	CIAP	8,500,000	23 acres
GIWW Bank Restoration of Critical Areas in Terrebonne	8/6/2010	Terrebonne	CIAP	7,274,676	1,180 acres
Lake Salvador Shoreline Protection (Phase III)	1/18/2009	St. Charles	CIAP	3,452,189	844 acres
Shoreline Protection Emergency Restoration	10/17/2013	Plaquemines	CIAP	355,780	16 acres
<b>Shoreline Protection Total</b>				<b>\$296,213,056</b>	<b>6,395 acres</b>
<b>Total Restoration</b>				<b>\$1,221,879,341</b>	<b>25,569 acres</b>
<b>Hurricane Protection</b>					
Lake Pontchartrain and Vicinity			HSDRRS	\$4,218,256,580	128 miles
West Bank and Vicinity			HSDRRS	1,900,000,000	71 miles
Southeast Louisiana			HSDRRS	600,000,000	
New Orleans to Venice			HSDRRS	464,000,000	58 miles
Larose to Golden Meadow - Flood Protection (Master Plan)	9/5/2014	Lafourche	State	19,820,000	23 miles
St. Bernard Parish 40 Arpent Levee Repairs	2/28/2011	St. Bernard	State	\$5,000,000	

<b>Project (Master Plan Related Project Highlighted in Yellow)</b>	<b>Date Completed</b>	<b>Location (Parish)</b>	<b>Source of Funding</b>	<b>Total Estimated Cost</b>	<b>Acres/Miles Improved</b>
Franklin Floodgate Sinkable Barge and Pump Station (Phase 1)	10/30/2013	St. Mary	Federal Hurricane Relief	4,031,997	0.20 miles
East Harvey Canal Interim Hurricane Protection - Phase 1	7/8/2009	Jefferson	State	4,000,000	
Madisonville Bulkhead Project	11/28/2014	St. Tammany	Federal Hurricane Relief	2,144,266	0.10 miles
Valentine to Larose	3/14/2014	Lafourche	State	1,000,000	0.38 miles
<b>Hurricane Protection Total</b>				<b>\$7,218,252,843</b>	<b>281 miles</b>
<b>Infrastructure</b>					
LA-1 Improvements - Fourchon to Leeville Bridge	10/25/2010	Lafourche	CIAP	\$33,000,000	
LA 1 Improvements - Fourchon to Leeville Bridge (CIAP)	8/30/2009	Jefferson	State	18,000,000	
Morgan City Industrial Road	1/15/2015	St. Mary	CIAP	1,247,000	
Port of Iberia Bridge Replacement - David Dubois Road over Commercial Canal	5/16/2013	Iberia	CIAP	1,058,013	
Port of Iberia Bridge Replacement - Port Road over Commercial Canal	5/16/2013	Iberia	CIAP	625,792	
Trosclair Road	7/30/2009	Cameron	CIAP	400,000	
<b>Infrastructure Total</b>				<b>\$54,330,805</b>	
<b>Total Protection and Infrastructure</b>				<b>\$7,272,583,648</b>	<b>281 miles</b>
<b>Source:</b> Prepared by legislative auditor's staff using information obtained from CPRA.					

## APPENDIX E: PROTECTION AND RESTORATION PROJECTS STILL IN PROGRESS (JANUARY 2008-JUNE 2015)

Project (Master Plan Related Projects Highlighted in Yellow)	Estimated Completion Date	Location (Parish)	Source of Funding	Total Estimated Cost	Projected Acres/Miles Benefited
<b>Barrier Island (BI) / Headland Restoration (HR)</b>					
Caminada Headland Beach and Dune Restoration INCR2 (Master Plan)	11/23/2016	Jefferson, Lafourche	Oil Spill	\$147,063,587	489 acres
<b>Total BI/HR</b>				<b>\$147,063,587</b>	<b>489 acres</b>
<b>Hydrologic Restoration</b>					
Central Wetlands Demonstration	1/12/2017	Orleans	CIAP (Federal)	\$3,561,832	17 acres
LPV Task Force Guardian Mitigation- Bayou Sauvage	7/1/2015	Orleans	HSDRRS	1,960,497	191 acres
<b>Total Hydrologic Restoration</b>				<b>\$5,522,329</b>	<b>208 acres</b>
<b>Marsh Creation</b>					
Mississippi River Long Distance Sediment Pipeline	10/5/2015	Jefferson, Plaquemines	CIAP	\$66,310,461	415 acres
Lake Hermitage Marsh Creation	7/29/2015	Plaquemines	CWPPRA (Federal/State Cost Share)	44,050,491	599 acres
Grand Liard Marsh and Ridge Restoration (Master Plan)	8/26/2015	Plaquemines	CWPPRA	42,804,677	502 acres
Bayou Dupont Marsh and Ridge Creation	10/5/2015	Jefferson	CWPPRA	38,324,646	317 acres
South Lake Lery Shoreline and Marsh Restoration (Master Plan)	5/2/2016	Plaquemines	CWPPRA	33,716,987	652 acres
Sabine Refuge Marsh Creation Cycles 4 and 5	7/8/2015	Cameron	CWPPRA	11,838,649	460 acres
Previously Authorized Mitigation WBV	2/13/2018	Jefferson, St. Charles	HSDRRS	11,000,000	1,217 acres
<b>Total Marsh Creation</b>				<b>\$248,045,911</b>	<b>4,162 acres</b>
<b>Other</b>					
Mississippi River Delta Strategic Planning - SSPM Expansion	3/11/2016	East Baton Rouge	CIAP	\$13,520,000	
<b>Total Other</b>				<b>\$13,520,000</b>	
<b>Shoreline Protection</b>					
LPV Mitigation Project, Manchac WMA Marsh Creation	1/28/2016	St. John the Baptist	HSDRRS	\$40,989,172	110 acres

<b>Project (Master Plan Related Projects Highlighted in Yellow)</b>	<b>Estimated Completion Date</b>	<b>Location (Parish)</b>	<b>Source of Funding</b>	<b>Total Estimated Cost</b>	<b>Projected Acres/Miles Benefited</b>
Barataria Basin Landbridge SP- Phase 3-CU7 and 8	11/2/2016	Jefferson, Lafourche	CWPPRA	\$26,351,988	5,587 acres
Non-rock Alternatives to Shoreline Protection Demo	11/13/2015	Iberia	CWPPRA	7,358,699	
Grand Isle - Fifi Island Breakwaters	12/31/2015	Jefferson	State	6,000,000	
East LaBranche Shoreline Protection	10/15/2015	St. Charles	CIAP	3,753,816	16 acres
<b>Total Shoreline Protection</b>				<b>\$84,453,675</b>	<b>5,713 acres</b>
<b>Total Restoration</b>				<b>\$498,605,502</b>	<b>10,572 acres</b>
<b>Hurricane Protection</b>					
Lake Pontchartrain and Vicinity			HSDRRS	\$1,014,755,700	All in Appendix D
West Bank and Vicinity			HSDRRS	1,600,000,000	All in Appendix D
Southeast Louisiana			HSDRRS	494,000,000	
Morganza to the Gulf (Master Plan)	N/A	Lafourche, Terrebonne	State	156,703,835	18 miles
New Orleans to Venice			HSDRRS	130,500,000	All in Appendix D
Jean Lafitte Tidal Protection	2/15/2016	Jefferson	State	23,032,639	3 miles
St. Charles West Bank Hurricane Protection Levee	10/30/2017	St. Charles	State	14,500,000	9 miles
<b>Total Hurricane Protection</b>				<b>\$3,433,492,174</b>	<b>30 miles</b>
<b>Infrastructure</b>					
Acadiana Regional Airport Street Improvements - Admiral Doyle Drive	10/15/2015	Iberia	CIAP	\$1,114,972	
<b>Total Infrastructure</b>				<b>\$1,114,972</b>	
<b>Total Protection and Infrastructure</b>				<b>\$3,434,607,146</b>	<b>30 miles</b>
<b>Source:</b> Prepared by legislative auditor's staff using information obtained from CPRA.					

## APPENDIX F: CPRA CONTRACTS ACTIVE IN FISCAL YEAR 2015 WITH GOVERNMENTAL ENTITIES

Contractor	Number of Contracts	Net Contract Amount (With Amendments)
Terrebonne Levee and Conservation District	2	\$149,819,806
Louisiana Department of Wildlife and Fisheries	6	21,159,463
Bayou Lafourche Fresh Water District	1	20,000,000
Lafitte Area Independent Levee District	3	17,730,000
Sewerage and Water Board of New Orleans	2	11,811,832
Louisiana State University	10	8,349,274
St. Charles Parish Council	2	8,344,530
U.S. Geological Survey	9	8,177,297
Terrebonne Parish Consolidated Government	2	4,050,000
Louisiana Universities Marine Consortium	4	3,917,829
St. Mary Parish Consolidated Gravity Drainage District No. 2	1	3,870,000
Plaquemines Parish Government	2	3,550,000
Southeast Louisiana Flood Protection Authority - East	1	3,000,000
Lake Charles Harbor and Terminal	1	3,000,000
Town of Madisonville	1	2,515,654
St Bernard Parish Government	1	2,000,000
Iberia Parish Government	1	1,672,500
St. Mary Parish Council	1	1,655,000
Louisiana Department of Agriculture and Forestry	2	1,600,000
Louisiana State University Agricultural Center	1	1,500,000
Vermilion Parish Police Jury	1	360,000
University of Louisiana at Lafayette	2	291,765
City of New Orleans Audubon Park Commission	1	175,000
Louisiana Department of Transportation and Development	1	100,000
Nicholls State University	1	87,000
Cameron Parish Police Jury	1	75,000
St. James Parish Government	1	72,000
City of Mandeville Police	1	25,000
University of New Orleans	1	3,000
<b>Total</b>	<b>63</b>	<b>\$278,911,949</b>
<b>Source:</b> Prepared by legislative auditor's staff using information obtained from CPRA and State's Contract Financial Management System (CFMS).		

## APPENDIX G: CPRA CONTRACTS ACTIVE IN FISCAL YEAR 2015 WITH NON-GOVERNMENTAL ENTITIES

Contractor	Number of Contracts	Net Contract Amount (With Amendments)
Weeks Marine, Inc.	4	\$280,007,897
HDR Engineering, Inc.	2	34,791,547
Water Institute of the Gulf	1	30,000,000
Coastal Estuary Services, LLC	1	20,385,596
Pine Bluff Sand & Gravel Company	1	15,702,993
Luhr Bros., Inc.	2	13,476,235
G.E.C., Inc.	3	13,000,000
CB&I Government Solutions, Inc.	2	10,500,000
Arcadis US, Inc.	3	10,000,000
Coastal Engineering Consultants, Inc.	2	10,000,000
Atkins North America, Inc.	2	9,500,000
Tetra Tech, Inc.	2	8,000,000
T. Baker Smith, LLC	2	8,000,000
Moffatt & Nichol, Inc.	2	7,500,000
Burk-Kleinpeter, Inc.	1	7,000,000
BCG-Dewberry JV	2	7,000,000
Stegall-Benton, LLC	2	7,000,000
Coast & Harbor Engineering, Inc.	2	6,000,000
C.H. Fenstermaker & Associates, LLC	2	6,000,000
CDM Smith, Inc.	2	6,000,000
URS Corporation	2	6,000,000
CH2M Hill	2	6,000,000
International Consulting Acquisition Corp.	1	5,673,870
Royal Engineers & Consultants, LLC	3	5,250,000
CSRS, Inc.	2	5,049,000
Covington Land Services, Inc.	1	5,000,000
Land Management Services, LLC	1	5,000,000
Oil Land Services, Inc.	1	5,000,000
SWCA Environmental Consultants	1	5,000,000
Professional Engineering Consultants Corporation	1	5,000,000
GCR, Inc.	1	5,000,000
Access Land & Title Services	1	5,000,000
Ardaman & Associates, Inc.	2	5,000,000
SJB Group, LLC	1	5,000,000
Louisiana Property Acquisition Company, LLC	1	5,000,000
Technology Engineers, Inc.	1	4,650,000
Great Lakes Dredge & Dock Company	1	4,250,220
Providence Engineering & Environmental Group, LLC	2	3,850,000
Lonnie G. Harper & Associates, Inc.	2	3,500,000
Grillot Construction, LLC	1	3,365,634

Oversight of Project Funding and Outcomes

<b>Contractor</b>	<b>Number of Contracts</b>	<b>Net Contract Amount (With Amendments)</b>
GeoEngineers, Inc.	1	\$3,000,000
BEM Systems, Inc.	1	3,000,000
W.F. Baird & Associates, Ltd	1	3,000,000
Neel-Schaffer, Inc.	1	3,000,000
Eustis Engineering Services, LLC	1	3,000,000
Ben C. Gerwick, Inc.	1	3,000,000
AECOM USA, Inc.	1	3,000,000
MWH Americas, Inc.	1	3,000,000
Sigma Consulting Group, Inc.	1	3,000,000
C & C Technologies, Inc.	1	3,000,000
Brown and Caldwell, Inc.	1	3,000,000
Stanley Consultants, Inc.	1	3,000,000
Stantec Consulting Service, Inc.	1	3,000,000
John Chance Land Surveys, Inc.	1	3,000,000
HNTB Corporation	1	3,000,000
Ducks Unlimited	3	2,425,537
Sealevel Construction, Inc.	1	2,004,442
Morris P. Hebert, Inc.	2	2,000,000
Bertucci Contracting	1	1,901,719
Oats & Marino, APPC	1	1,700,000
Alden Research Laboratory	1	1,487,690
Professional Construction Services, Inc.	1	1,206,500
Methods Technology Solutions, Inc.	1	1,200,000
The Trust for Public Land	1	1,025,000
Acadian Environmental, Inc.	2	1,005,000
Water Campus, LLC	1	1,000,000
EMC, Inc.	1	1,000,000
HydroTerra Technologies, LLC	1	1,000,000
Lowe Consulting, LLC	1	1,000,000
Chustz Surveying, Inc.	1	1,000,000
Plauche & Carr, LLP	1	1,000,000
Coalition to Restore Coastal Louisiana	4	931,907
CF Bean, LLC	1	795,680
Volute, Inc.	1	496,053
Soil Erosion Services, LLC	3	420,872
Gahagan & Bryant Associates, Inc.	1	400,000
RAND	1	400,000
The Nature Conservancy	1	400,000
Ecological Restoration Services, LLC	1	308,840
Dennis, Bates & Bullen, LLP	1	300,000
Vilar & Elliott, LLC	1	250,000
Innovative Emergency Management	2	249,020
Dunlap Fiore, LLC	1	225,000
Kantrow, Spaht, Weaver & Blitzer	1	225,000
Wharton-Smith, Inc.	1	198,565
Breazeale, Sachse & Wilson, LLP	1	150,000
Janke & Associates, APLC	1	100,000

<b>Contractor</b>	<b>Number of Contracts</b>	<b>Net Contract Amount (With Amendments)</b>
Comite Resources, Inc.	1	\$100,000
Restore the Earth Foundation	1	100,000
Apache Louisiana Minerals, LLC	2	58,750
Independent Land Services, LLC	1	49,999
Dan Delich Consulting	1	48,000
Rose Financial Services, LLC	1	43,000
Leonard Shabman	1	42,500
Carl T. Friedrichs	1	37,500
Daniel L. Childers	1	37,500
Jennifer L. Irish	1	37,500
Edward Donald Houde	1	37,500
Ventura Publishing & Research, LLC	1	37,500
Michael K. Orbach	1	37,500
WaterWonks, LLC	1	37,500
B & J, Inc.	1	35,800
Associated Reporters, Inc.	1	25,000
Mary Catherine Hager	1	20,000
Patrice Melnick	1	10,000
<b>Total</b>	<b>144</b>	<b>\$681,055,364</b>
<b>Source:</b> Prepared by legislative auditor's staff using information obtained from CPRA and state's Contract Financial Management System (CFMS).		

<b>Public Comment Entry #:</b> 72
<b>First Name:</b> Kali
<b>Last Name:</b> Roy
<b>City:</b> New Orleans
<b>State:</b> LA
<b>Content:</b> The Master Plan currently does not include research nor improvement to the infrastructure around large-scale evacuation in and through the Greater New Orleans area. While considered "the last line of defense" for coastal protection to tropical storms, we know that during larger storm surge and flooding events evacuation is the only option that will nearly guarantee prevention of loss of life. While mandatory evacuations are declared by the state and handled by the parishes, the infrastructure of that system will need review and improvement-- including ensuring the roads/highways leading out have a safe BFE in case of severe traffic backup during contraflow. Cars breaking down and running out of gas cause a severe impediment to traffic flow, and when you are moving over 2 million people out of the area-- this can create a situation where people are sitting in their cars on bridges when the hurricane force winds hit the coast. Is the state looking at this?
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 71
<b>First Name:</b> Max
<b>Last Name:</b> Hungerford
<b>City:</b> Gueydan
<b>State:</b> LA
<b>Content:</b> I am probably the longest living individual in this area, and this has been the fourth time that I have experienced severe flooding. In my opinion, drainage through the locks is not adequate for these types of situations. All four times, the locks remained closed too long and this last flooding sent approximately 1 foot of water on my property for approximately 10 days. Max
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 70
<b>First Name:</b> Emma
<b>Last Name:</b> Weisner
<b>City:</b> New Orleans
<b>State:</b> LA
<b>Content:</b> This is such an important issue! Glad the government is focusing on it and working to preserve the LA coast. That being said, I would like to see the Native American tribes in the area included in the plan and their sacred sites protected as well.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 69
<b>First Name:</b> David
<b>Last Name:</b> Lindenfeld
<b>City:</b> Baton Rouge
<b>State:</b> LA
<b>Content:</b> See attached file.
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/413cd060-f13e-0134-6ed4-2209579c9604/Bayou_Manchac_concern_for_Coastal_Management.docx">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/413cd060-f13e-0134-6ed4-2209579c9604/Bayou Manchac concern for Coastal Management.docx</a>

I am a concerned citizen and member of Together Baton Rouge, a citizens' organization. Although I am not a technical expert, I have been investigating the possibility of future flooding in our area since the August 2016 disaster.

While I realize that East Baton Rouge Parish does not officially fall within the coastal zone, I have serious concerns about the impact of coastal erosion and flooding on parts of Baton Rouge, due to possible elevated water levels in Lake Maurepas and consequent backwater flooding into our area. As I understand it, such elevated levels could result from several scenarios: 1) a storm surge due to a hurricane; 2) the so-called "tilting" of water within Maurepas due to a lesser storm that stalled in this region, affecting both the lake itself and the lower Amite basin; 3) a similar "tilt" due to high winds (less likely).

A report by the Pontchartrain-Maurepas Surge Consortium from May 2016—before the August flood—states, "Although Baton Rouge is not considered a coastal city, during the past few decades Greater Baton Rouge has sprawled eastward into bedroom communities, while hurricane surge inundation seems to be incrementally moving further westward toward Baton Rouge. These trends suggest that the outlying communities of our state capital are no longer insulated from the crisis in our coastal zone." (p. 8)

According to an article in the Baton Rouge Advocate on February 6 2017 by Steve Hardy, "Researchers modeled hundreds of thousands of storms and found that the risk of flooding around Baton Rouge shoots up precipitously from the worst-case Category 2 storm and the most destructive Category 3 storm. . . [The latter] could push water over much of Baton Rouge that lies between Highland Road and the Mississippi River, depending on the storm's track and conditions at the time. It also could cause Ward Creek to overrun and the Amite River to overflow, especially south of Interstate 12." The article was based on the latest version National Hurricane Center's Storm Surge Hazard Map.

An especially precarious waterway in this scenario is Bayou Manchac, a tributary of the Amite River, which is fed in turn by the tributaries of Bayou Fountain, Ward's Creek, and Bayou Duplantier, all of which penetrate deep into South Baton Rouge. During the August 2016 flood, there was significant backflow in these waterways. Water levels in Bayou Manchac itself rose from 6 to 15 feet between August 12 and 14. This water spilled over Alligator Bayou Road to the south into the Spanish Lake basin in Ascension Parish, where it stayed, flooding homes for several weeks. An event even half this size which did not reach Spanish Lake could easily flow back into the aforementioned tributaries to the north. There is of course need to do something about the flow of water in Bayou Manchac that would reduce the risk of flooding in both Ascension and East Baton Rouge Parishes.

While this may be beyond the purview of the 2017 coastal management plan, it is urgently needed to be part of the next revision.

David Lindenfeld

4759 Newcomb Drive

Baton Rouge, LA 70808

<b>Public Comment Entry #:</b> 67
<b>First Name:</b> Raymond "Mac"
<b>Last Name:</b> Wade
<b>City:</b> Morgan City
<b>State:</b> LA
<p><b>Content:</b> On behalf of the Port of Morgan City, I offer the following comments regarding CPRA’s 2017 Draft Coastal Master Plan.</p> <p>We propose using sediment from the Atchafalaya River to (1) create marsh on Point Au Fer in Western Terrebonne Parish and (2) for marsh creation projects in Eastern Terrebonne Parish.</p> <p>(1) The marsh creation project titled Point Au Fer Island Marsh Creation Project ID: 03b.MC.09 is currently included in the 2017 Draft Coastal Master Plan. The Project Factsheet description states “Creation of approximately 13,000 acres of marsh on Point Au Fer Island to create new wetland habitat and restore degraded marsh.” We believe it is imperative that this project remain in the final 2017 Master Plan document.</p> <p>Point Au Fer serves as the barrier island that provides the first line of protection from storm surge to Morgan City and the surrounding area as called for in the “multiple lines of defense” strategy used by the Coastal Protection and Restoration Authority (CPRA) in both the 2012 Master Plan and the Draft 2017 Master Plan.</p> <p>In CPRA’s Flood Risk and Resilience Program it states “To protect communities from coastal flooding, we must take a “multiple lines of defense approach.” If the Point Au Fer project is removed from the 2017 Master Plan, there will be no opportunity to maintain Morgan City’s first line of defense at Point Au Fer through federally funded programs that require the State’s cost-share. It would be a disservice to remove the only coastal restoration protection project afforded the Morgan City area by the “multiple lines of defense strategy” in the 2017 Plan. Therefore, we strongly recommend that CPRA leave the Point Au Fer Island Marsh Creation Project ID: 03b.MC.09 in the Draft 2017 Master Plan as proposed.</p> <p>(2) We are also in support of a long-distance sediment pipeline which would be strategically placed in the Atchafalaya River sending sediment to East Terrebonne Parish for marsh creation at sites that are currently included in the Draft Master Plan.</p> <p>The Atchafalaya River is one of America’s greatest natural resources. When dredge material is used beneficially, islands are created with nutrient rich sediment where vegetation grows naturally and birds and wildlife claim the area as their habitats almost immediately. In an interview with Fox 8 News, Chris Allen, CPRA Project Manager for a beach restoration project in Plaquemines Parish, referring to the Mississippi River, stated that, “the river provides better sand than the offshore material used on beaches in the past.” The Atchafalaya River carries those same sediments. Fish, wildlife and coastal habitats can be created, community resilience can be promoted by creating natural buffers from storms, and flood waters can flow out to the Gulf more quickly through dedicated dredging of the Atchafalaya River with increased beneficial use of sediment.</p>

It should be noted that if rivers are not allowed to drain and flow past communities, then damage from any coastal flooding event would be exacerbated. Should dedicated dredging not be considered part of the “multiple line of defense approach” thereby eliminating the threat of combined riverine, backwater and coastal flooding, providing flood risk reduction for communities?

While the Increase Atchafalaya Flow to Terrebonne Parish is intended to create marsh in Eastern Terrebonne Parish, the Port of Morgan City has serious concerns about possible effects on Bayou Chene and the Atchafalaya River to the Gulf of Mexico and the stakeholders who depend on these waterways for their existence.

We understand that there is still a great deal of modeling to be done and additional stakeholders who should be consulted. The Port and our stakeholders are looking for answers to the following questions:

- (1) What will be the changes in velocity along the GIWW? If there are changes, how will this affect the bottom line for the shipper/carrier? It is believed that during times of greater flow, the shipper may incur more costs because it will require greater horsepower to navigate the area with their tows. Will there also be safety concerns involved?
- (2) Will there be increased sedimentation at docks along the GIWW? These are privately owned facilities who pay to maintain their own waterfronts. Will this increase their maintenance costs? Will there be any compensation from the State for any hardships created?
- (3) What will the changes in velocity be down Bayou Chene and the Atchafalaya River out to the Gulf of Mexico? Will tows be affected in any way? Will more horsepower be required, thereby incurring more costs to industry?
- (4) What will water elevations be in the GIWW, Bayou Boeuf and Lake Palourde when water is sent through the diversion at various flow rates?
- (5) When the flow rate is at maximum capacity and there is a major rain event in the Lake Verret system, how long will it take for water elevations to go down once the system is shut off?
- (6) Will there be additional sediment accumulation along Bayou Chene and the Atchafalaya River to the Gulf of Mexico? Will there be any compensation from the State to assist with dredging the additional sedimentation that is likely to accumulate?
- (7) Have you spoken to a variety of stakeholders and users who can give you a broad perspective of concerns? Who have you spoken to? Do you have written comments?

We would strongly suggest that you look in to the possibility of an alternative to the Increase Atchafalaya Flow to Terrebonne Project that would accomplish your goals with less possible impact on industry. We request that through value engineering you investigate increasing waters from Lake Verret through Lake Palourde and Bayou Boeuf and reducing the flow from the Atchafalaya River to the proposed area. There is a relationship within this watershed that should be appropriately considered.

We also strongly recommend that rainfall be included in your modeling. We were told by a CPRA expert that Lake Verret and Lake Palourde cannot be considered in your modeling because they only hold black water which would not be beneficial to the flow of fresh water to Terrebonne. It appears that because you must look at worst case scenario your modeling is based on no rain falling. We would

suggest that you look at rainfall history for the area to develop a more likely rainfall amount in the basin over the next 50 years, considering that, according to National Weather Service records, annual rainfall averages over the past 50 years have been 60.81 inches with a minimum annual average of 40.71 inches in 2011.

Finally, the Port of Morgan City is in support of the St. Mary Levee District's Bayou Chene Flood Protection and Diversion Project and strongly encourage you to include this project in the final 2017 Master Plan. As an added benefit, we believe that this project will enhance the natural flow of water from Lake Verret to eastern Terrebonne Parish and would provide protection from backwater flooding in St. Mary, Terrebonne, Assumption, St. Martin, Iberville and Lafourche Parishes.

Additionally, the Morgan City Back Levee (03b.HP.10) projects are included in the Master Plan; however, the implementation period has been extended out to the 31 to 50-year period. This project, with State assistance and local funding is nearing 80% completion. Its full implementation is critical for Morgan City and surrounding areas to achieve 100-year flood protection which will give residents the Flood Insurance status previously enjoyed.

In closing, I would like to note that the concepts we are supporting are regional in nature and can provide benefits to multiple parishes beyond Morgan City and St. Mary Parish.

**Attachments:**

<b>Public Comment Entry #:</b> 66
<b>First Name:</b> Mark
<b>Last Name:</b> Breux
<b>City:</b> Gheens
<b>State:</b> LA
<b>Content:</b> The second draft leaves the Gheens community out of the loop and will not be included within the levee system. This is unfair to the people who live in this community. We are citizens of the State of Louisiana and deserve to be included and protected.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 65
<b>First Name:</b> Anne
<b>Last Name:</b> Parr
<b>City:</b> HOUMA
<b>State:</b> LA
<b>Content:</b> Glyphosate is a chemical used in herbicides such as Monsanto's "Roundup." It does not work specifically against any particular weed, but kills all herbage -- weeds and beneficial organisms including marsh grass. Our coastal parishes currently allow this chemical to be sprayed along bayous and other waterways, and it is destroying our coastline, not to mention our communities since it is suspected of being a carcinogen and has also been linked in some studies to autism and birth defects. My comment is to ban the spraying of herbicides altogether or at least within 100 feet of any body of water. Vinegar kills weeds and is non-toxic, or machinery does a fine job. Thank you for considering my comments.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 64
<b>First Name:</b> David
<b>Last Name:</b> Dardar
<b>City:</b> St.bernard
<b>State:</b> LA
<b>Content:</b> Dredge sediment from the river & dump it in the mouth of the caernarvon diversion while it is flowing. The diversion will spread it throughout the area. Then use smaller dredges to keep the main bayous navigable.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 62
<b>First Name:</b> Blaise
<b>Last Name:</b> LeCompte
<b>City:</b> Chauvin
<b>State:</b> LA
<b>Content:</b> I would like to urge that the Master Plan include a provision that no toxic / weed killing type chemicals be allowed to be used within 100 feet of any water body. While we are in the mode of rebuilding and restoring our coast any attempt to "kill" vegetation would be counter productive and hazardous to our environment and health of those working in our coastal environments. We must find other ways of eliminating invasive plants and carefully consider alternatives to restore our environment to its once pristine state. Thanks for your consideration.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 61
<b>First Name:</b> Peggy
<b>Last Name:</b> Ohler
<b>City:</b> Slidell
<b>State:</b> LA
<b>Content:</b> It is imperative that the Senate strongly supports and passes legislation for the Homeowners Flood Insurance Affordability Act asap. The House should also be urged to do the same. Please help Louisiana's residents who have already been through hell with the flooding over the past years. We are already Insurance poor and any increase in premiums will result in either people moving out of the state or disastrous flooding and many people without insurance. Thank you!
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 60
<b>First Name:</b> Randy
<b>Last Name:</b> Moertle
<b>City:</b> Lockport
<b>State:</b> LA
<b>Content:</b> See attached letter.
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/343ac420-ed58-0134-1055-4609657a2091/RCA_Draft_2017_Master_Plan_comment_letter_3.17.17.pdf">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/343ac420-ed58-0134-1055-4609657a2091/RCA Draft 2017 Master Plan comment letter 3.17.17.pdf</a>



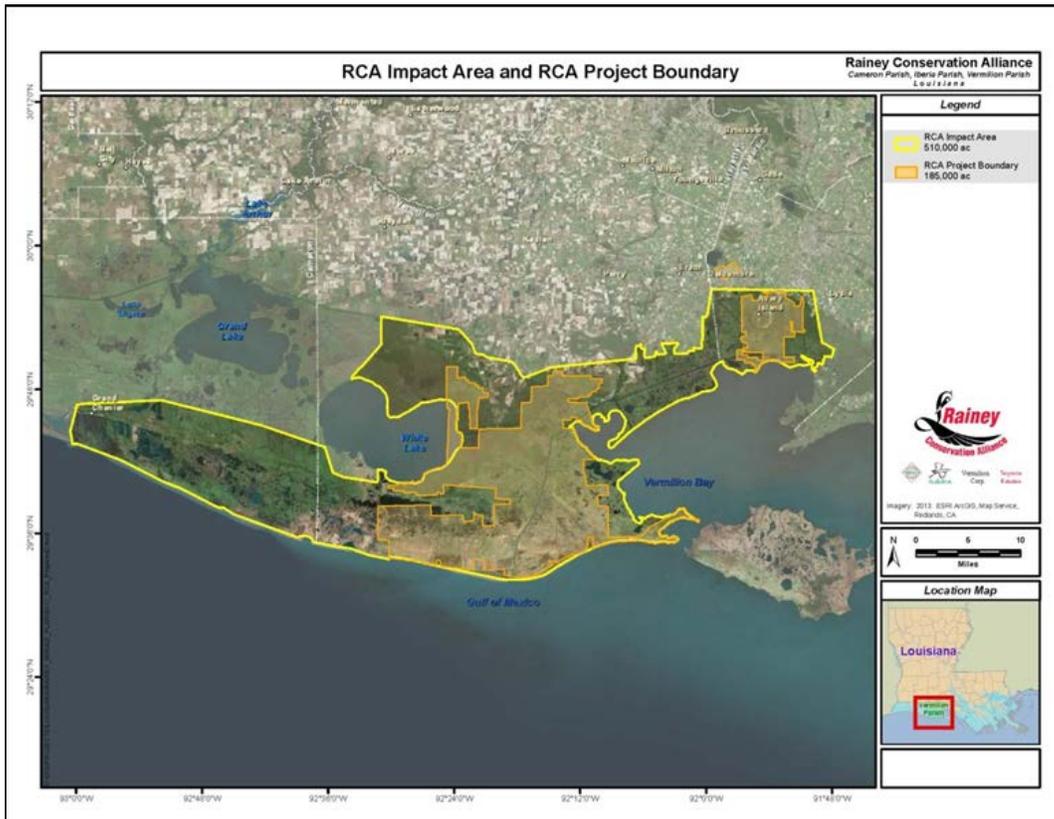
March 17, 2017

The Coastal Protection and Restoration Authority  
 P.O. Box 44027  
 Baton Rouge, LA 70804

**RE: Draft 2017 Coastal Master Plan Letter of Support**

Dear Coastal Protection and Restoration Authority (CPRA):

The Rainey Conservation Alliance (RCA) is a coalition of landowners and land managers working together in Vermilion and Iberia Parishes. Each member of the RCA has a long history in the region and a deep commitment to Louisiana’s people, wetlands, waters, and wildlife. Collectively, the RCA members own and manage 187,000 acres of Louisiana coastal wetlands (Figure 1). Our specific members include Paul J. Rainey Sanctuary, Vermilion Corporation, Sagrera Estates, E.A. McIlhenny Enterprises LLC, Avery Island Inc., and McIlhenny Resources properties. Our goal is to protect and restore wetlands within the region through a coordinated collective effort of personnel and resources. The RCA also works closely with the Louisiana Department of Wildlife and Fisheries that own Rockefeller Wildlife Refuge and State Wildlife properties that abut RCA properties in Vermilion Parish on the west and east sides.



The RCA would like to express our support for the State's *Draft 2017 Louisiana's Comprehensive Master Plan for a Sustainable Coast* (Draft 2017 MP). Our properties are currently included in the Draft 2017 MP for the following projects:

#### **Marsh Creation (MC)**

1. East Rainey MC (03b.MC.07)
2. Freshwater Bayou North MC (004.MC.100)
3. Freshwater Bayou South MC (004.MC.101)
4. East Pecan Island MC (004.MC.16)
5. White Lake MC (004.MC.102)
6. West Rainey MC (004.MC.07)

#### **Shoreline Protection (SP)**

1. Freshwater Bayou SP (03b.SP.01)
2. Freshwater Bayou Canal SP (004.SP.03)

#### **Ridge Restoration**

1. Cheniere au Tigre Ridge Restoration (004.RC.02)
2. Pecan Island Ridge Restoration (004.RC.03)

As the landowner/managers we believe it is imperative that the referenced projects remain in the final 2017 MP document for the following reasons:

1. **Science and Modeling** – Page ES-11 of the Draft 2017 MP, states that science and modeling approach “is used across the world as a model for science-based coastal decision making.” We believe that the modeling approach is the best alternative we have at this time to assess projects on a scale commensurate with the scope of the Louisiana coastal wetlands. We understand that models are fallible and are only as good as the data put into them, but this science is improving and provides an unbiased methodology of ranking and prioritizing projects. Therefore, we believe that those projects that made it into the Draft 2017 MP should remain in the final document based on the existing science and not be removed for political expediency.

Comments supporting our position on the science and modeling used to develop the 2017 MP were given in Houma, LA at the Coastal Protection and Restoration Act (CPRA) public meeting on January 24, 2017 as follows:

- State Senator Norby Chabert (Chairman of Senate Natural Resources Committee) praised the science and technology that was used to develop the MP.
- Johnny Bradberry (Executive Assistant of Coastal Activities and Chairman of the CPRA) stated that the best science available was used in formulating the plan.
- Bren Hasse (Assistant Administrator CPRA) stated that there was improved science and technical analysis in developing the 2017 MP over that used in the 2012 MP.

- Jerome Zeringue (Louisiana Representative for District 52) stated that the plan was based on science.
  - Randy Moertle (RCA Executive Director) made similar comments of support for the science based project selection process of the plan.
2. **Multiple Lines of Defense** – The RCA properties serve as the first line of protection from tropical storms for Lafayette, Abbeville, and New Iberia to the north, Lake Charles to the west, and Morgan City to east as called for in the “*multiple lines of defense*” strategy used by the Coastal Protection and Restoration Authority (CPRA) in both the 2012 Master Plan and the Draft 2017 Master Plan. In CPRA’s Flood Risk and Resilience Program it states, and I quote, “To protect communities from coastal flooding, we must take a “*multiple lines of defense approach*”<sup>1</sup>.” This strategy was also reinforced by America’s Wetland Foundation (AWF) which stated “There are solutions to restoring the values of the coast that science agrees must move forward immediately. A comprehensive process is required, knowing that success must include both integrated ecosystem restoration and hurricane protection - often called “*multiple lines of defense*,” which was the goal of Louisiana’s Comprehensive Master Plan for a Sustainable Coast.”<sup>2</sup> All of the referenced projects provide valuable protection from tropical storms to our most highly populated areas in Southwest and Central Louisiana. If any of our ten referenced projects from the 2017 MP are removed, it will diminish our abilities to reinforce our “multiple lines of defense” strategy that is a cornerstone to our integrated coastal land building and risk reducing plan.

Comments supporting the “multiple lines of defense” strategy were given in Houma, LA at the Coastal Protection and Restoration Act (CPRA) public meeting on January 24, 2017 by the following individuals:

- Gordy Dove (Terrebonne Parish President) stated that “multiple lines of defense” were necessary and vital for the protection of the parish.
  - Reggie Dupre (Executive Director of the Terrebonne Levee and Conservation District) touted the “multiple lines of defense” strategy and stated that it was essential to protection of infrastructure.
3. **RCA Framework Development Team and Landowner Focus Group Participation** – Cynthia Duet (National Audubon Society) was appointed and actively participated in the Framework Development Team for both the 2012 and 2017 Master Plans. Sherrill Sagrera (Sagrera Estates) and Randy Moertle were appointed and participated in the Landowner Focus Group for both the 2012 and 2017 Master Plans. Their combined 100 year plus of coastal wetland experience were invaluable in assisting the CPRA developers in understanding conditions, concerns, and consensus strategies for providing protection and restoration to southwest Louisiana in the planning and design of both MPs. Each of the projects included in the draft have been vetted not only by the CPRA, but also by the regional landowners,

<sup>1</sup> <http://coastal.la.gov/a-common-vision/2017-master-plan-update/ccrp/>

<sup>2</sup> <https://www.americaswetland.com/custompage.cfm?pageid=258>

parish governments, and local interests as critical to the protection and restoration to our area and region.

## **RCA 2017 MP IMPROVEMENT RECOMMENDATIONS**

### **Shoreline/Bank line Protection**

The one area of greatest concern for the RCA in the 2017 MP has been the obvious lack of shoreline and bank line protection projects. Although we greatly appreciate those projects included in the plan, we believe the single greatest flaw of the plan is providing a mechanism to allow State funding to be used strategically along shorelines and bank lines where there are marsh creation sites planned and/or already funded for construction. It seems counter intuitive to plan or actually construct a marsh creation project along a bay or navigation channel that has no foreshore protection barrier. As we know, an unprotected shoreline will allow erosion and tidal scouring processes to continue unabated which will greatly diminish the effectiveness and longevity of any marsh creation projects constructed.

We would recommend that those shoreline and bank line projects that were in the 2012 MP be reinstated into the 2017 MP, but under a no-cost category. This would not compromise the cost of the \$50 billion 2017 MP and would afford the CPRA with the option and flexibility to strategically place rock on the foreshore of newly created wetlands where absolutely essential (e.g. along a navigation channel). The other option would be to have a CPRA policy position change that would allow shoreline and/or bankline protection in front of any new marsh creation site on a project determined on a project by project and/or funding availability basis.

## **CONCLUSION**

In conclusion, the RCA would like to commend all the planners, modelers, and stakeholders that have worked tirelessly in developing the Draft 2017 MP. We understand the enormity of the task and support both the science and the multiple lines of defense strategy used to develop the Draft 2017 Master Plan. We would strongly recommend that CPRA leave the previously referenced projects mentioned in this letter of support in the final 2017 Master Plan.

We thank you for your consideration of our comments.

Sincerely,



Randy Moertle  
Rainey Conservation Alliance - Executive Director

<b>Public Comment Entry #:</b> 59
<b>First Name:</b> Lauren
<b>Last Name:</b> Averill
<b>City:</b> Jefferson
<b>State:</b> LA
<b>Content:</b> Jefferson Parish's comments to the master plan are attached in the letter below.  Regards, Lauren E. Averill, P.E. Jefferson Parish Coastal Zone Coordinator
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/84741ec0-ed52-0134-f438-4609657a2091/Jefferson_CPRA_Master_Plan_2017_Official_Comments.pdf">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/84741ec0-ed52-0134-f438-4609657a2091/Jefferson_CPRA_Master_Plan_2017_Official_Comments.pdf</a>



# JEFFERSON PARISH

Office of the President

March 16, 2017

**Michael S. Yenni**  
Parish President

Mr. Johnny Bradberry  
Governor's Executive Assistant for Coastal Activities  
Coastal Protection and Restoration Authority  
P.O. Box 44027  
Baton Rouge, LA 70804

**Reference: The State of Louisiana's Comprehensive Master Plan for a Sustainable Coast**

Dear Mr. Bradberry:

Barataria Basin is located in Jefferson Parish and has the highest coastal land loss in the state and was ground zero for the Deep Water Horizon Oil in the summer 2010. Our residents are still recovering from the impacts from this ecological and economic disaster, yet the state is spending the largest portion of its Restore Act Direct Component funds and Spill Impact Component funds in areas that had minimal oil impacts. To add to this man-made disaster, the draft current 2017 Coastal Master Plan provides limited coastal restoration for our Parish.

### Jefferson Parish Priority Projects for the 2017 Coastal Master Plan

CPRa has committed to Jefferson Parish that two crucial projects essential to coastal restoration, risk reduction and sustainability will be included in the Final 2017 Coastal Master Plan: 1. Lafitte Tidal Levees (a system of 10 separate tidal levee projects) and 2. The Mississippi River Long Distance Sediment Pipeline Project - Phase II – West of Barataria. Both the State and Jefferson Parish have already committed and have spent funds on these projects. CPRa states that "the master plan, in its purest sense, is a list of projects that build or maintain land and reduce the risk to our communities." Therefore, we expect that these eleven projects will be listed projects in the 2017 Coastal Final Plan, whether that be in the Future Without Action Project List, or the Selected Projects list in the 2017 Master Plan, as shown in the tables at the end of this letter. We also suggest the creation of a FWOA Map, depicting the location and footprints of the projects included in the FWOA project list, as well as the creation of fact sheets for these projects:

- Town of Lafitte Tidal Levees  
Tidal ring levees for Lafitte's ten (10) drainage basins are necessary to provide flood protection for this area in advance of several other Master Plan projects which will raise water levels in the Lafitte area. The 2017 Master Plan's Mid Barataria Sediment Diversion, Ama Sediment Diversion, the Upper Barataria Risk Reduction project, and the completion of the Western Closure Complex, will further impact the Lafitte community by increasing the risk of flooding, and tidal levees must be constructed in the first implementation period to provide crucial flood protection for the Lafitte area.

Joseph S. Yenni Building – 1221 Elmwood Park Blvd – Suite 1002 – Jefferson, LA 70123 – PO Box 10242 – Jefferson, LA 70181-0242

Office 504.736.6400 – Fax 504.736.6638

General Government Building – 200 Derbigny St – Suite 6100 - Gretna, LA 70053 – PO Box 9 – Gretna, LA 70054

Office 504.364.2700 – Fax 504.364.2828

Email: MYenni@jeffparish.net Website: www.jeffparish.net

- Mississippi River Long Distance Sediment Pipeline – Phase 2

The Mississippi River Long Distance Sediment Pipeline (BA-43) was specified in the Louisiana CIAP plan approved by the Department of Interior in 2010, to rebuild the Barataria Landbridge and adjacent marsh using sediment from the Mississippi River from Plaquemines Parish, through Jefferson and into Lafourche Parish.

Phase 1 of BA-43 was completed in 2015 and rebuilt land between the Mississippi River and the east bank of Bayou Barataria Waterway. Prior to the pipeline removal during the fall of 2017, several marsh creation projects were constructed using Mississippi River sediment, a renewable resource, via the pipeline corridor.

Phase 2 of the Mississippi River Long Distance Sediment Pipeline (BA-43) will rebuild the Barataria Landbridge westward from the Barataria Bay Waterway into Lafourche Parish. Currently there is a serious void in projects on the western reach of Barataria Bay and implementation of this project will provide a conduit for future coastal restoration projects in this area to be built using Mississippi River sediments. Language should be added to the Plan that makes it clear that this project is a Master Plan project to move forward in the first implementation period.

The Barataria Landbridge and the south shoreline of Lake Salvador are critical landforms to the protection of Jefferson Parish west bank communities, particularly in the Lafitte area, and the west bank Hurricane and Storm Damage Risk Reduction System (HSDRRS). The Barataria Landbridge also serves an important ecological function by reducing salt water intrusion into the upper basin. Construction of the Barataria Bay Waterway, numerous other man-made canals constructed in support of the oil and gas industry, and wetland loss due to natural forces and subsidence have diminished the ability of the Landbridge to act as an additional line of defense from storm surge & salt water intrusion.

There following two projects were in the 2012 Master Plan and early drafts of the 2017 Master plan, but were removed in the final draft made January 3, 2017:

- South Lake Salvador Shoreline Protection

The marsh along the southern shoreline of Lake Salvador has also suffered from the construction of a federal navigation channel, the Gulf Intracoastal Waterway, as well as from the construction of oil and gas access canals and erosion from natural forces. This line of defense is on the verge of collapse, allowing storm surge from Lake Salvador to directly impact communities in the Lafitte area. While much has been done to stabilize marsh east of the Barataria Bay Waterway, Jefferson and Lafourche parishes will be vulnerable until the south shore of Lake Salvador is stabilized.

- Barataria Bay Rim Restoration Project:

The lack of restoration projects on the western side of the Barataria Basin leaves Jefferson Parish extremely vulnerable to storm surge and excludes the Barataria Bay Rim Marsh Creation project. Sustaining the marsh fringe of Barataria Bay is not only important for fisheries habitat, but it also protects the large expanse of marsh that serves as the second line of defense for lower Barataria communities. The Barataria Bay Rim Marsh Creation project can be constructed incrementally, providing opportunity for project advancement as funding sources are identified.

Jefferson Parish is disappointed that the following four (4) projects which were included in earlier 2017 Master Plan drafts as late as October 2016 were not included in the Draft Plan released on January 3, 2017, and Jefferson Parish requests that these projects be reinserted into the Draft Plan as their absence in the Plan makes it difficult to secure funding from other venues such as CWPPRA, NRDA, RESTORE Act, and others.

- 002.SP.107 Shoreline Protection on south shore of Lake Salvador
- 002.MC.07 Barataria Bay Rim Marsh Creation
- 002.MC.100 North Barataria Bay Marsh Creation
- 002.SP.101 Fifi Island Shoreline Protection

It is not clear to us why these projects fell out of the Master Plan between October and January, yet if they were removed due to costs or size constraints, we ask that there be language in the Plan that would deem these projects consistent with the Master Plan in order for Jefferson Parish to pursue other funding venues. Some iteration of three (3) of these projects (002.SP.107, 002.MC.07, 002.MC.100) have been CWPPRA candidates in the past, and we are concerned that their omission from the Master Plan will hinder their consideration on future CWPPRA lists.

#### Ama Diversion Fund Re-allocation

As an alternative to the costly, redundant, and potentially damaging Ama Sediment Diversion, we propose freeing the nearly \$1 billion in the plan's budget devoted to the project and substituting it with projects that continue the exemplary work already completed by CPRA through utilization of the Mississippi River Long Distance Sediment Pipeline. The Bayou Dupont Sediment Delivery System (BA-39), the Bayou Dupont Marsh and Ridge Creation Project (BA-48), the Bayou Dupont Marsh Creation #3 and Terracing Project (BA-164), and the extension of the corridor through the Mississippi River Long Distance Sediment Pipeline East of the Barataria Waterway (BA-43-EB) all prove the viability of transporting the same riverine resources utilized by sediment diversions to more targeted areas of dire need throughout the Barataria Basin.

Jefferson Parish urges CPRA to consider reallocation of a portion of funds from Ama Sediment Diversion to fund Phase 2 of the Long Distance Sediment Pipeline. The Ama Sediment Diversion (Project ID: 001.DI.101), while a definitively beneficial project in its own right, addresses an area already targeted by other projects, both in the proposed plan and already constructed, including the Mid-Barataria Diversion (Project ID: 002.DI.102) located near Myrtle Grove in Plaquemines Parish. The Ama Sediment Diversion is proposed to be constructed in incredibly close proximity to the Davis Pond Freshwater Diversion, which has been operating successfully for nearly 15 years. The addition of the Ama Sediment Diversion's 50,000 cfs of proposed freshwater flow into the vicinity of the Davis Pond outfall area will cause higher water levels in addition to sea level rise, especially for the town of Jean Lafitte, which has no structural flood protection proposed in the current Draft 2017 Master Plan.

#### Jefferson Parish Project Priority List

As discussed above, the CPRA Coastal "master plan, in its purest sense, is a list of projects" and the tables below list the Jefferson Parish projects we wish to be included, as either Future Without Action (FWOA (Attachment A1) or Projects Selected for the 2017 Coastal Master Plan.

## Attachment A1: Projects to be in 2017 FWOA

Project ID	Project Name	Program	Project Type	Last Year of Construction
BA-0043-EB	Long Distance Mississippi River Sediment Pipeline – Phase 2 (West of Barataria to Lafourche Parish)	CIAP (St.)	MC	Pending
BA-0075-1	Jean Lafitte Tidal Protection	Surplus 07	HP	Pending
BA-0075-2*	Rosethorne Tidal Protection	Surplus 07	HP	Pending
BA-0075-3	Fischer School Basin	CPRA	HP	

Southeast				
Projects Selected in the 2017 Coastal Master Plan				
Project Type	Project No.	Project Description	Implementation Period	Page
Structural Protection	002.HP.##	Goose Bayou Tidal Protection	Year 1-10	
	002.HP.##	Lower Lafitte Tidal Protection	Year 1-10	
	002.HP.##	Paillet Basin Tidal Protection	Year 1-10	
	002.HP.##	Crown Point Tidal Protection	Year 1-10	
	002.HP.##	Lower Barataria Tidal Protection	Year 1-10	
	002.HP.##	Upper LA 45 Tidal Protection	Year 1-10	
	002.HP.##	Lower LA 45 Tidal Protection	Year 1-10	
Marsh Creation	002.HP.##	Jones Point Tidal Protection	Year 1-10	
	002.MC.07	Barataria Bay Rim Marsh Creation	Year 1-10	
Shoreline Protection	002.SP.105	North Little Lake Shoreline Protection		

In conclusion, Jefferson Parish appreciates the opportunity to comment on the draft 2017 Master Plan and looks forward to working together with CPRA on the projects listed above to sustain and build a resilient coast for not only Jefferson Parish, but the entire coast of the State of Louisiana.

Sincerely,

**MICHAEL S. YENNI**  
President

cc: Honorable Chris Roberts, Jefferson Parish Councilman, Chairman-at-Large  
 Honorable Ricky Templet, Jefferson Parish Councilman, District 1  
 Mr. Johnny Bradberry, Chairman of the CPRA  
 Mr. Chip Kline, Deputy Director for Coastal Activities  
 Mr. Bren Haase, CPRA Coastal Resources Administrator  
 Ms. Lauren Averill, Jefferson Parish Coastal Zone Management Coordinator

<b>Public Comment Entry #:</b> 58
<b>First Name:</b> Thomas
<b>Last Name:</b> Thompson
<b>City:</b> Eden Isles
<b>State:</b> LA
<p><b>Content:</b> Make Flood Insurance Rates an Integral Part of CPRA Project Selection</p> <p>Surge flooding is not the most significant risk facing Louisiana residents living along the coast. Residents can always evacuate and rebuild.</p> <p>The most significant issue facing Louisiana residents living along the coast is the loss of affordable flood insurance.</p> <p>Washington has made it clear, they want out of the flood insurance business! Once that happens, it will be impossible for people to live anywhere that does not have levee protection.</p> <p>CPRA Master Plan Project selection must place a priority on projects that will lower flood risk to a point where flood insurance is affordable.</p> <p>Marsh creation projects will not provide flood insurance relief, but levees, elevation grants and buyouts will. This is where the CPRA needs to concentrate its efforts.</p>
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 57
<b>First Name:</b> Mike
<b>Last Name:</b> Rbertshaw
<b>City:</b> New Orleans
<b>State:</b> LA
<b>Content:</b> My comments are as follows:  1) Urgency! Urgency! Urgency! <b>DRASTICALLY</b> speed up the process of putting the Mississippi River back to work through large scale diversions.  2) To the degree that you have a say in it, it seems counterproductive to have all of these projects to rebuild land while we're still cutting, or proposing to cut pipelines through our coast (Bayou Bridge). The CPRA should use whatever authority it can muster to stridently oppose any new pipeline construction.  Thank you, Mike Robertshaw
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 56
<b>First Name:</b> George
<b>Last Name:</b> Ricks
<b>City:</b> St. Bernard
<b>State:</b> LA
<b>Content:</b> SEE ATTACHED FILE
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/d9d98100-eaf8-0134-5b2a-22de39f91ffe/2017_Master_plan_comments.pdf">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/d9d98100-eaf8-0134-5b2a-22de39f91ffe/2017_Master_plan_comments.pdf</a>

March 1, 2017

Coastal Protection and Restoration Authority  
P.O. Box 44027  
Baton Rouge, Louisiana 70804

Re: 2017 Coastal Master Plan Comments

To whom it may concern:

The Save Louisiana Coalition has been very active in the efforts to promote responsible coastal restoration, along with our vigilance to protect our valuable Commercial and Recreational fishing industries. We also strive diligently to promote and protect our seafood industries so vitally important to the economy of some communities, like St. Bernard and Plaquemines, as well as the culture and heritage of the fishing families who provide the bounty of 25% of the nation's seafood.

We sincerely appreciate the recent efforts of the CPRA to improve communication with local governments and coastal stakeholders who will be most affected by some projects in the 2017 Master Plan. The SLC looks forward to working more closely to voice the concerns of the fishing and coastal communities to further a Master Plan that more accurately reflects the needs of a true working coast. Our organization looks forward to promoting such a plan.

The SLC would like to thank the CPRA for the following projects included in the draft of the 2017 Master Plan.

1. Bayou Loutre Ridge Restoration
2. Bayou Terre Aux Beoufs Ridge Restoration
3. Breton Marsh Creation
4. Lake Borgne Marsh Creation

We also are pleased to see that the large scale 250,000 cfs diversions have been excluded from the 2017 Master Plan. However, the SLC remains concerned about the proposed Central Wetlands Diversion at Violet.

Because of the preliminary cost estimate (\$231 Million), project location, and projected benefits, we feel that the cost-benefit ratio and lengthy permitting process will ultimately make the proposed project infeasible. The SLC recommends these funds be redirected to marsh creation projects in Lake Lery, Biloxi Marsh, or rebuilding Chandeleur Island.

The SLC will also continue to closely monitor the permitting process of the Mid Barataria, Mid Breton and Lower Breton Sediment Diversions. We would like to remind the Coastal Protection and Restoration Authority of the importance of the Marine Mammal Protection Act, and that both the Barataria and Breton Sound Basins are Federally Classified as Essential Fish Habitat, and therefore protected under the Magnuson-Stevens Act. The SLC firmly believes these diversion projects cannot be operated in any adaptive management regime to protect our fisheries, and still offer any substantial land building capabilities, nullifying any cost-benefit. Therefore, we are firmly opposed to any diversions being constructed in the Breton Sound or Barataria basins.

The SLC also suggests that the CPRA strongly consider designing and constructing a sediment pipeline for the East Bank of the Mississippi River. The CPRA has seen the great success and land building capabilities of the long distance sediment pipeline on the West side of the river. The same can be accomplished on the East bank, providing a sustainable source of sediment for years to come, in a more affordable and efficient manner than sediment diversions, with minimum effects to our wetlands and fisheries.

The SLC also would like to stress the importance of the Biloxi Marsh in protecting St. Bernard, New Orleans, and St. Tammany Parishes from storm surge. We suggest the Point Aux Marchettes Shoreline Protection and Marsh Terracing project be included in the 2017 Master Plan. Furthermore, the SLC also supports barrier island restoration and the overall multiple lines of defense strategy for protecting coastal Louisiana.

The SLC would also like to see the Levee Project in Lafitte, previously in the 2012 Master Plan be included in the 2017 Master Plan. This higher levee is crucial to protect Lafitte.

Two Levee projects in Plaquemines, the Phoenix to Bohemia back levee, and the Braithwaite to White Ditch back levee, were excluded from the plan. The SLC would like these projects included, as they are crucial in storm surge protection.

The SLC believes that the Caernarvon Freshwater Diversion should only be operated for the purpose of modifying salinity to enhance our local fisheries. It was not designed to build land, nor should it be considered for this purpose. Scientific evidence has shown a drastic reduction of below ground biomass was caused by nutrient overload due to overuse of the diversion prior to hurricane Katrina.

We applaud the CPRA for stressing the importance and significance of Louisiana's working coast, and hope that the CPRA continues the quest, and puts more value in the input of the fishing community and the knowledge that has been acquired by generations of families who make this coast work!

The SLC looks forward to continuing our efforts and hopes that a stronger working relationship with the CPRA can continue, not only to rebuild our coast, but enhance, not harm our valuable fishing resources and communities.

Thank you for your consideration. If you have any questions, please feel free to contact me.  
([georgericks15@gmail.com](mailto:georgericks15@gmail.com))

Sincerely,

Captain George Ricks  
President  
The Save Louisiana Coalition

<b>Public Comment Entry #:</b> 55
<b>First Name:</b> Sherry
<b>Last Name:</b> Seat
<b>City:</b> Cameron
<b>State:</b> LA
<b>Content:</b> The Master Plan does not include shoreline protection/restoration which is desperately needed, and has been proven to help sustain our wetland/Cheniere plain. As a beach resident in Cameron Parish for 14 years, I see the beach and shoreline everyday, so I can also see the loss from the erosion. Without the shoreline restoration in 2002, the beaches in the Johnson Bayou would not have remained after both Hurricanes Rita 2005 & Ike 2008. The Chenier Plain with our working wetlands is vital in La and the only one in U.S. . It is also one of three major plains of its kind in the world. Your plan includes Marsh restoration, which is needed, but how will the marshes be sustained? Without shoreline protection, salt water intrusion will follow and destroy the marsh progress. I urge you to rethink the plan to include shoreline protection, as it is the first line of defense from a storm. My plea is not for me & my home, houses can be rebuilt. This is about saving a very unique area in La & U.S. The land is vital to the people and the people are vital to the land. Thank you for allowing me to voice my opinion.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 54
<b>First Name:</b> Jeannette
<b>Last Name:</b> Dubinin
<b>City:</b> Baton Rouge
<b>State:</b> LA
<b>Content:</b> Summary of CPEX's comments:  <ul style="list-style-type: none"> <li>- identify and dedicate funding for the Flood Risk and Resilience Program (aka nonstructural program)</li> <li>- expand eligibility and activities for CPRA nonstructural funds</li> <li>- increase incentives and enforcement of nonstructural activities</li> <li>- align and strengthen prerequisites and incentives of structural and nonstructural activities.</li> </ul> <p>More detailed comments are attached.</p>
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/9bb73b00-e806-0134-5eb0-666f31f68106/CPRA_2017DRAFTCoastalMasterPlan_CPEX_Public_Comments.pdf">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/9bb73b00-e806-0134-5eb0-666f31f68106/CPRA_2017DRAFTCoastalMasterPlan_CPEX_Public_Comments.pdf</a>

March 10, 2017

To whom it may concern,

Center for Planning Excellence (CPEX) is a non-profit organization that coordinates urban, rural and regional planning efforts in Louisiana. We provide best-practice planning models, innovative policy ideas, and technical assistance to individual communities that wish to create and enact comprehensive plans that guide transportation, infrastructure and land use investments and inform quality design for the built environment. As such, CPEX's work focuses on planning, land use, development standards, public outreach and engagement, and developing implementation strategies. Many of these activities are a part of the Flood Risk & Resilience Program.

CPEX commends CPRA for a strong and forward-looking framework to address the planning and implementation needs to reduce flood risk in coastal Louisiana. To that end, CPEX is providing public comments on the 2017 Draft Coastal Master Plan that will further strengthen the Flood Risk & Resilience Program and its framework. The public comments suggest to:

- identify and dedicate funding for the Flood Risk and Resilience Program (aka nonstructural program);
- expand eligibility and activities for CPRA nonstructural funds;
- increase incentives and enforcement of nonstructural activities; and
- align and strengthen prerequisites and incentives of structural and nonstructural activities.

The detailed public comments can be found below.

For additional information and/or questions, please contact Center for Planning Excellence.

Sincerely,



Jeannette Dubinin

Director of Coastal Program

# Implementing a “Multiple Lines of Defense” Concept through Nonstructural Flood Risk Reduction in South Louisiana

*Public Comment on the CPRA 2017 DRAFT Coastal Master Plan  
Friday, March 10, 2017*

## **Introduction: The Ascendant Consensus for Multiple-Lines-of-Defense**

Standing between South Louisiana communities and encroaching floodwaters is a vast network of structural defenses – mainly levees and floodwalls. This system of structural protection has grown and evolved over centuries. Construction accelerated following the Mississippi River flood of 1927 and again after hurricanes Katrina and Rita. But as those 2005 hurricanes and the floods of 2016 demonstrated, levees alone are not sufficient to protect life and property. At stake is the economic, social, and cultural viability of South Louisiana – the survival of our coast and its communities.

In South Louisiana, a comprehensive approach to managing flood risk, known as “multiple lines of defense,” has emerged as the preferred strategy (Lake Pontchartrain Foundation: 2008). In it, all “lines” work together to reduce aggregate risk: the “front lines” reduce impacts behind them, and the “rear lines” mitigate residual risk and protect against failures. Louisiana’s barrier islands reduce impacts of hurricanes on restored wetlands (restoration projects); wetlands reduce impacts on primary levees and stormwalls, which are potentially backed up by smaller neighborhood levees (structural protection); the final lines are activities that mitigate risk for individual structures, including flood proofing, elevation, and relocation (nonstructural protection). Nonstructural protection is supported by programmatic initiatives such as planning, zoning, freeboard, code enforcement, flood insurance, public education, and evacuation. In exposed places that will not receive restoration or structural protection projects, nonstructural investments are the only practical defenses against flood damage.

The multiple-lines-of-defense strategy has attained near-universal consensus and support from scientists, academics, impacted local communities, and advocacy groups. Most importantly, the state’s plan for the coast now fully embraces all lines of the concept, including the nonstructural “rear” ones (CPRA: 2017, p. E 3). For the first time, the Coastal Protection and Restoration Authority (CPRA) 2017 Coastal Master Plan – Louisiana’s blueprint for integrated coast-wide risk reduction – establishes a formal program for funding and implementing nonstructural flood-risk initiatives, alongside the coastal restoration and investments in structural protection that have been part of CPRA’s Master Plans since 2007. These nonstructural flood-risk initiatives – the “rear lines” – make up the CPRA’s Flood Risk & Resilience Program.

The below summary and recommendations for revisions to the 2017 Coastal Master Plan Draft focus on the Flood Risk & Resilience Program.

### Funding for Flood Risk & Resilience Program

In 2012, CPRA estimated that achieving comprehensive risk reduction would require approximately \$10.2 billion be invested in the then-called nonstructural program – the equivalent of 20% of all protection and restoration funding over 50 years (CPRA: 2012, p. 36). CPRA reiterated this ambitious figure three years later (CPRA: 2015), but the 2017 Coastal Master Plan's more sophisticated modeling reduced the nonstructural component to \$6.1 billion, or about 12% of the total estimated outlay (CPRA: 2017, p. 92).

Rather than dedicate funds in advance, CPRA allocates funding to the Flood Risk & Resilience Program every three years, as they accrue from state oil and gas revenues, GOMESA, WRDA, FEMA and HUD mitigation and disaster funds, and private investment. These allocations are reported, and project status is updated, in CPRA Annual Plans (CPRA: 2017 Annual Plan, p. xi).

Nonstructural investments are proven to make fiscal sense. A landmark 2005 study (cited by CPRA) found that every \$1 spent on non-levee mitigation yields approximately \$4 in savings (NIBS: 2005). Among the projects recommended in the 2017 Coastal Master Plan, 5 of the 20 that generate the greatest absolute risk reduction are nonstructural, and 15 of the 20 most cost-effective projects are nonstructural (CPRA: 2017, pp. D 60-1).

### CPRA's Flood Risk & Resilience Project Funding Program

Under the 2017 Coastal Master Plan, CPRA will provide funding primarily for three nonstructural activities: for *non-residential* structures 0-3 feet below the 1% annual chance flood, CPRA funds flood proofing; for *residential* structures 3-14 feet below, structural elevation; and for *residential* structures more than 14 feet below, voluntary acquisition and relocation (CPRA: 2017, p. E 9). Support is also available for technical assistance and capacity building associated with application and eligibility requirements (CPRA: 2017, p. E 28).

CPRA's Flood Risk & Resilience program spatially integrates nonstructural investments with restoration and structural protection projects in the 2017 Coastal Master Plan. This supports the multiple-lines-of-defense concept by meaningfully aligning nonstructural investment variously to land behind planned or existing levees as well as to unprotected areas (CPRA: 2017, p. 90-1). CPRA will provide a baseline cost-share of 90:10 (state:local) for all nonstructural funding.

The 2017 Coastal Master Plan accomplishes its nonstructural program in several phases. First, CPRA's 2017 Coastal Master Plan used a sophisticated risk assessment model to determine eligibility for funding of nonstructural activities. Fifty-four coastal "project areas" were established, bounded by political boundaries, existing or proposed levee-protected areas, or other relevant geographical or hydrological features (CPRA: 2017, p. E 13). (CPRA concedes that it does not yet have a sound methodology for incorporating programmatic nonstructural activities such as planning and zoning into its modeling (CPRA: 2017, pp. C 11-12)). The project areas were then modeled through multiple scenarios using different environmental and protection-and-restoration assumptions. Finally, the project areas were scored according to criteria that included mitigation of flood risk, economic impact, cost effectiveness, reduction of insured losses, and protection of vulnerable populations (CPRA: 2017, p. E 10-16).

Of the project areas initially considered, 32 were identified as eligible (CPRA: 2017, p. E3 2) for nonstructural project funds. The model selected nonstructural project areas that have levees; are slated to receive levees, where nonstructural efforts will therefore maximize the utility of those investments; and that neither have levees nor are planned to, and therefore can only be mitigated via nonstructural means (CPRA: 2017, pp. 100-101). Once a project area is deemed

eligible, its parish government must apply to CPRA for nonstructural funding; applications will be reviewed by the Flood Risk & Resilience Subcommittee (CPRA: 2017, p. E 7).

Second, as a pre-requisite for receipt of any nonstructural project funding, CPRA will require that applicants have (or draft and adopt) and enforce a hazard mitigation plan and (where applicable) a local comprehensive plan, and that these are both consistent with the Coastal Master Plan (CPRA: 2017, p. E 21). This further supports alignment of various efforts, consistent with a multiple-lines-of-defense strategy.

Finally, CPRA incentivizes additional programmatic nonstructural activities by offering incentives to communities participating in nonstructural projects by reducing local cost-share. The three incentivized activities are increased Community Rating System (CRS)<sup>1</sup> participation, requiring 2 feet of freeboard, and enacting policy to direct infrastructure towards low-risk areas. Each activity adds 5% to the state's 90% share of nonstructural project costs; therefore, pursuing any two activities reduces the local share to 0% (CPRA: 2017, p. E 25-6).

Separate from project funding, CPRA has begun to lead increased coordination across state agencies and between the various levels of government via its Flood Risk & Resilience Subcommittee (CPRA: 2017, p. E 7). CPRA also offers a series of excellent (but non-binding) recommendations for improving and integrating local comprehensive, land use, recovery, and hazard mitigation plans; local development ordinances, regulations, and building codes; FEMA's National Flood Insurance Program (NFIP); and the state DNR's Coastal Zone Management (CZM) program (CPRA: 2017, pp. E1 1-31). And CPRA has developed a Coastal Master Plan Data Viewer, an interactive tool that helps local communities develop resiliency measures by providing data and visibility on flood depth, expected annual damages, and Coastal Master Plan projects in the pipeline (CPRA: 2017, p. ES-20).

CPRA's selection and eligibility criteria thus make several key linkages, connecting objective measures of risk with alignment between local projects and planning and the state's Coastal Master Plan. The 2017 Coastal Master Plan has the potential to provide an even stronger framework by identifying sustainable program funding, expanding the application eligibility criteria and eligible activities, increasing the incentives for complementary programmatic nonstructural measures, and including again a stronger outreach and education component.

<sup>1</sup> The Community Rating System (CRS) is a voluntary incentive program of the National Flood Insurance Program (NFIP) that recognizes and encourages community floodplain management activities that exceed minimum NFIP requirements. As a result, flood insurance premium rates are discounted to reflect the reduced flood risk resulting from the community actions meeting the goals of the CRS.

## Recommendations for 2017 CPRA Coastal Master Plan

The many excellent aspects of the 2017 Coastal Master Plan notwithstanding, any ambitious and complex undertaking such as this one will have opportunity for further improvements. CPEX's public comments and recommendations are listed below.

### 1. CPRA Nonstructural Funding

- a. Dedicated funding for nonstructural activities: The 2017 Coastal Master Plan proposes funding nonstructural activities at \$6.1 billion over 50 years – approximately 12% of total funding, or 24% of all protection funding (CPRA: 2017, p. 92). This commitment to a multiple-lines-of-defense strategy is both laudable and fiscally responsible. However, CPRA currently does not expressly *dedicate* any funds for nonstructural activities.  
 → *A nonstructural funding stream should be dedicated, either via a dollar amount (absolute) or via percentage (relative) formula.*
- b. Annual nonstructural funding: The 2017 Coastal Master Plan draft is the first 5-year update to establish a nonstructural program (the Flood Risk & Resilience Program). As a result, to-date no Annual Plan has allocated funds to nonstructural projects. In order for Annual Plans to be consistent with the 2017 Coastal Master Plan, each Annual Plan would have to allocate not less than the percentage described in the 2017 Coastal Master Plan – that is, 12% of all annual funding or 25% of protection funding (CPRA: 2017, p. 92). In fact, whereas the 2017 Coastal Master Plan calls for implementation of most nonstructural work during years 1-30 (CPRA: 2017, pp. E 32; E2 8-9), annual outlays on nonstructural will need to *exceed* the percentages laid out in the Coastal Master Plan if its risk-reduction goals are to be realized.  
 → *All Annual Plans from 2018 onward should allocate to nonstructural projects not less than 12% of total annual protection-and-restoration funding, or 25% of protection funding (whichever is greater).*

### 2. Authority to Allocate CPRA Nonstructural Funding

- a. Clarifying the authority of the Flood Risk & Resilience Subcommittee: The 2017 Coastal Master Plan states that the Flood Risk & Resilience Subcommittee – which includes CPRA, GOHSEP, and several other state agencies – will allocate nonstructural project funds to parishes (CPRA: 2017, p. E 9). However, the document subsequently contains language that appears to indicate only CPRA and GOHSEP will jointly have such authority (CPRA: 2017, p. E 17)  
 → *The Coastal Master Plan language should be amended and clarified to place local nonstructural funding allocation authority with CPRA Flood Risk & Resilience Subcommittee.*

### 3. Applicant Eligibility for CPRA Nonstructural Funds

- a. Applications from entities other than parishes, under certain circumstances: Under the 2017 Coastal Master Plan, only parishes are eligible to apply for and receive nonstructural funds from CPRA. This intends to locate nonstructural planning and program implementation at a sub-regional level, and is consistent with the GOHSEP/HMA grant-administration model (CPRA: 2017, pp. 100-101).  
 → *This eligibility criterion should be amended to allow for cases in which a parish government opts not to pursue nonstructural project funding, in which case other entities (e.g., municipalities, levee districts, or even non-profits) should be eligible to apply to the Flood Risk & Resilience program and administer the funds.*

- b. Prerequisites for receipt of nonstructural project funds: As a prerequisite for receipt of CPRA nonstructural project funds, under the 2017 Coastal Master Plan local governments are required to adopt and enforce local hazard mitigation plans and (where applicable under existing state statute) comprehensive plans; moreover, these must be consistent with the Coastal Master Plan itself (CPRA: 2017, p. E 21). These are excellent requirements that will result in a coherent approach to implementation of a multiple-lines-of-defense strategy with support and planning from levels of government. Moreover, the 2017 Coastal Master Plan recognizes the additional value of zoning and the state Uniform Construction Code in its recommendations appendix (CPRA: 2017, p. E1 18).

→ *Whereas adoption of comprehensive planning provides a framework for jurisdiction-wide risk reduction, it should be a prerequisite for receipt of any CPRA nonstructural project funds, notwithstanding existing exemptions related to comprehensive or master plans under state statute.*

→ *Whereas adoption and enforcement of zoning (concurrent with the comprehensive plan), and the state Uniform Construction Code directly implement risk reduction at the local-government scale, these should be prerequisites for receipt of any CPRA nonstructural project funds.*

- c. Eligibility of project areas for nonstructural funding in locations where risk is increased by Coastal Master Plan structural or restoration investments: There are structural/restoration investments in the 2017 Coastal Master Plan that have the adverse effect of worsening flood risk in some locations. In many parts of southeastern Louisiana, this is an inevitable result of structural or restoration protection. Due to the plan's mapping resolution (CPRA: 2017, pp. 146-7, D 90-2), it is not clear whether all such adversely impacted places are eligible project areas for nonstructural funds (CPRA: 2017, p. 101).

→ *Any location where risk is increased due to the 2017 Coastal Master Plan should be an eligible project area for nonstructural funding under the plan.*

#### 4. Incentivizing Programmatic Nonstructural Activities

- a. Incentives for programmatic risk reduction measures: The 2017 Coastal Master Plan proposes a base 90:10 state:local cost-share on nonstructural activities, with additional 5% incentives to parishes that undertake enhanced CRS participation, adoption of 2' freeboard, or planning and regulation to steer infrastructure investment away from high-risk areas (CPRA: 2017, pp. E 25-6). Therefore, any two such activities would result in a 100:0 cost share. This is a good basis for funding physical nonstructural work and incentivizing additional programmatic work.

→ *The state should increase its leverage by beginning with a less advantageous cost split (for example, 80:20) on one hand, and increasing the incentive for the programmatic nonstructural activities (for example, to 10%) on the other.*

- b. Mechanism for accountability and enforcement of incentivized activities: As a prerequisite for receipt of CPRA nonstructural project funds, under the 2017 Coastal Master Plan local governments are required to adopt *and enforce* local comprehensive and hazard mitigation plans; enforcement is validated every three years (CPRA: 2017, p. E 21). This enforcement mechanism ensures program compliance and the advancement of strategic goals. Currently, however, a parallel enforcement

mechanism is *not* described for the three incentivized activities (i.e., CRS, freeboard, and locating infrastructure to low-risk areas) (CPRA: 2017, pp. E 25-6).

→ *CPRA should describe such an enforcement mechanism for incentivized activities.*

## 5. *Activities Eligible for CPRA Nonstructural Funding*

- a. Funding for residential structures 0-3 feet below the 1% annual chance flood: Currently, the 2017 Coastal Master Plan intends to fund flood proofing for structures 0-3 feet below the 1% annual chance flood, but *only for commercial structures*. Meanwhile, a structure must be 3-14 feet below the 1% annual chance flood to qualify for structural elevation (CPRA: 2017, p. E 29). Therefore, *no funding support is currently envisioned for residential structures 0-3 feet below the base flood elevation*. Although this is consistent with NFIP policy, it is contrary to a multiple-lines-of-defense approach, as well as to common sense.

→ *CPRA should either fund flood proofing of residential structures 0-3 feet below the 1% annual chance flood, or allow such structures to be eligible for elevation (including 2 feet of freeboard).*

- b. Demolition/ reconstruction on-site, where cost-effective: Currently, the 2017 Coastal Master Plan intends to fund elevation as the exclusive nonstructural activity for structures 3-14 feet below the 1% annual chance flood (CPRA: 2017, p. E 30). However, in some cases (e.g., brick slab-on-grade construction) elevation may be less cost effective than complete demolition and construction of an elevated structure on-site.

→ *CPRA should therefore allow complete demolition and reconstruction on-site only in cases where it is shown to be the most cost-effective option.*

- c. Funding for local technical assistance and capacity building: The 2017 Coastal Master Plan allows for use of project funding in support of local technical assistance and capacity building related to activities that are prerequisites for nonstructural project funding (i.e., hazard mitigation plans and comprehensive plans consistent with the Coastal Master Plan) (CPRA: 2017, p. E 28). CPRA has indicated that reimbursement for such efforts could be as much as 5% of project costs. CPRA will also reimburse local applicants for application costs, including determining cost-share. These measures will help support local participation in nonstructural programs. However, comparable technical assistance and capacity building is not currently available in support of incentivized activities (i.e., CRS, freeboard, and steering infrastructure away from risk). This omission constitutes a significant counter-incentive to activities CPRA hopes to encourage.

→ *Support for local technical assistance and capacity building should therefore include the incentivized activities under the nonstructural program.*

→ *As a further inducement to participation in the three incentivized activities, CPRA should also add increasing the 5% match for technical assistance and capacity building to the incentives.*

→ *CPRA and the Flood Risk & Resilience Subcommittee should explore development of a more thorough and comprehensive program of technical assistance and capacity building, to include both direct staffing (case manager) support and on-call advising from subject-matter-experts; partnerships with university and non-profit partners should be explored.*

- d. Outreach and Education: Currently, CPRA and the 2017 Coastal Master Plan promote utilization of its Coastal Master Plan Data Viewer as the primary means of outreach and

education (CPRA: 2017, p. ES-20). This tool is indeed an effective means for communicating risk, but it would benefit greatly by support from a robust public outreach and education strategy that strategically targets local elected leaders and government agency staff; property owners; and real estate, development, and construction industry practitioners. Meanwhile, the 2017 Coastal Master Plan does not propose to directly fund outreach and education in support of nonstructural (or other) efforts to reduce risk, notwithstanding the proven efficacy of such efforts (CPRA: 2017, p. E 10).

→ *CPRA and the Flood Risk & Resilience Subcommittee should therefore explore funding public outreach efforts through the Coastal Master Plan, or identify alternate programs and funding streams that could support an integrated public outreach and education strategy and program; partnerships with university and non-profit partners should be explored.*

## 6. Prerequisites and Incentives Related to CPRA Structural Protection Funding

- a. Prerequisites for receipt of CPRA structural protection funds: As noted above, as a prerequisite for receipt of CPRA Flood Risk & Resilience project funds, under the 2017 Coastal Master Plan local governments are required to adopt and enforce local comprehensive and hazard mitigation plans, and these must be consistent with the Coastal Master Plan (CPRA: 2017, p. E 21). We have further previously recommended that adoption and enforcement of zoning (concurrent with the local comprehensive plan) and the state Uniform Construction Code be similarly required for receipt of such funds, consistent with the direction of the Coastal Master Plan nonstructural recommendations appendix (CPRA: 2017, p. E1 18). Currently, no such prerequisites are attached to receipt of funds for *structural* protection project funding. But extension of such prerequisites to *structural* project funding would be consistent with the 2012 Coastal Master Plan, which urged project funding for new levees to “require implementation of certain nonstructural programmatic measures to coincide with implementation of structural ... projects” (CPRA: 2012, p. F2 10). Furthermore, CPEX’s research in The View from the Coast indicated that local government would in some cases be amenable to such requirements being dictated by the state, because this would remove the requirements from the realm of local politics and thus reduce the political risk for local leaders to do the right thing (CPEX: 2015, p. 31).

→ *CPRA should therefore consistently implement its commitment to a multiple-lines-of-defense approach by also establishing pre-requisites for receipt of funding for structural protection measures that match those for nonstructural funding.*

- b. Incentives for receipt of CPRA structural protection funds: The logic described in the above recommendation applies equally to activities that are incentivized under the 2017 Coastal Master Plan (CPRA: 2017, p. E 25-6).

→ *For structural protection projects, CPRA should also incentivize the same three activities that are currently incentivized only for nonstructural funding (i.e., CRS, freeboard, and locating infrastructure to low-risk areas).*

- c. Requiring risk-reduction activities behind existing or planned levees: A thorough embrace of a multiple-lines-of-defense strategy implies mitigation and risk-reduction activities in areas that are protected by levees, or that are planned to receive such protection. As presently envisioned, requirements and programs for such areas are voluntary only. This can at best result in a partial solution on the ground.

→ *Therefore, CPRA and the Flood Risk & Resilience Subcommittee should explore policy options for requiring implementation of appropriate nonstructural measures (e.g., additional freeboard) behind CPRA-funded or other existing levees.*

## References

- Center for Planning Excellence, "The View From the Coast: Local Perspectives and Policy Recommendations on Flood Risk Reduction in South Louisiana." (CPEX: 2015)
- Lake Pontchartrain Foundation and Coalition to Restore Coastal Louisiana, "Multiple Lines of Defense 2008 Report, Version 1." (McKnight Foundation: 2008).
- Louisiana Coastal Protection and Restoration Authority. "CPRA Flood Risk & Resilience Program Update: Stakeholder Webinar." Webinar, August 18, 2015.
- . "Integrated Ecosystem Restoration & Hurricane Protection in Coastal Louisiana: Fiscal Year 2017 Annual Plan." (State of Louisiana: 2017).
- . "Louisiana's Comprehensive Coastal Master Plan for a Sustainable Coast." (State of Louisiana: 2012).
- . "Louisiana's Comprehensive Coastal Master Plan for a Sustainable Coast." (State of Louisiana: 2017).
- National Institute of Building Sciences Multihazard Mitigation Council. "Natural Hazard Mitigation Saves: An Independent Study to Assess the Future Savings from Mitigation Activities." (National Institute of Building Sciences: 2005).

<b>Public Comment Entry #:</b> 53
<b>First Name:</b> Cindy
<b>Last Name:</b> Campisi
<b>City:</b> Abbeville
<b>State:</b> LA
<b>Content:</b> We need a levee of significant height south of Hwy 330 and south of Perry along with some type of locks system to have any hope of preserving the cities of Vermilion Parish. Perhaps a levee along the intracoastal canal as has been discussed in the past? This must be done without delay. There is no more time to waste.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 52
<b>First Name:</b> James
<b>Last Name:</b> Wilkins
<b>City:</b> Baton Rouge
<b>State:</b> LA
<p><b>Content:</b></p> <p>It is encouraging to see CPRA acknowledging the effects of sea level rise in the 2017 Master Plan. The rate of sea level increase may be a little low given the most recent estimates but probably the highest that is politically acceptable given our state's position on climate change. Our politicians' general denial of anthropogenic climate change could hurt Louisiana's coastal restoration efforts from a number of perspectives. Leading the charge to undo global climate change efforts could result in a much higher rates of sea level rise and thus swamp any efforts we might make towards restoration. It also makes us look disconnected from reality when we use sea level rise as a cause of our coastal land loss problems while also denying the phenomenon and its causes. In our coastal restoration efforts we must always use the best available science to guide us.</p> <p>In the debate over the ownership of newly created land we should not forget why we are in the predicament of having to attempt such a monumental task as proposed in the Master Plan. A significant part of our plight is human disregard for natural systems. If private property owners are given ownership of created land it should only be with the absolute prohibition of activities that damage that land, especially activities like dredging, that have been responsible in a large part for where we are now. This could be in the form of conservation easements that would acknowledge the public benefits of private land for storm surge protection, habitat, fisheries production, carbon sinks, etc. Likewise, if the created land is in state ownership the state should not allow any activity that that would threaten to undo restoration. It will be a permanent black eye on the state of Louisiana if we seek and receive taxpayer money to restore our coast then turn around and do the same stupid things that got us here in the first place.</p> <p>The persistent hypoxia that has plagued the Gulf of Mexico could affect coastal restoration. Diversions might be curtailed to avoid adding more nutrients to areas already in extreme hypoxic conditions. Louisiana should support measures to control nutrient loading all along the Mississippi River basin including within Louisiana.</p>
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 51
<b>First Name:</b> Murray
<b>Last Name:</b> Starkel
<b>City:</b> Southlake
<b>State:</b> TX
<p><b>Content:</b> As CPRA is in the process of gaining legislative approval for outcome based performance contracts where they can competitively bid full-delivery contracts to vendors that will acquire the land / land rights, design, permit, build, then maintain to a performance standard and only pay for completed projects with payments over an extended period of time up to 25 years, the master plan needs to address this tool that will bring private sector dollars into financing these projects with payback over time. This is exactly the program successfully used in the state of NC for their Full-delivery Ecosystem Enhancement Program. Here is a link to their program by the numbers: <a href="http://nccoastalreserve.net/web/eep/by-the-numbers">http://nccoastalreserve.net/web/eep/by-the-numbers</a></p> <p>CPRA must ensure that they fully consider this mechanism to accelerate the restoration of critical wetland habitat by using this method in conjunction with other traditional procurement methods such as DB / DBB or CMAR. They must also consider programmatically allocating funding from very secure funding mechanisms such as the DWH NRDA, RESTORE Act, and NFWF's Gulf Environmental Benefit Fund across a outcome based performance contract INSTEAD of getting bond financing. Bond financing can be helpful but adds additional unnecessary costs to the procurement of the projects when programmatically committing the funding costs CPRA and the federal government nothing.</p> <p>Lastly, I encourage CPRA to modify their annual spending plan to include a pilot / demonstration project using the new procurement method of outcome based performance contract where CPRA can solicit vendors who will select a site that is consistent with (on, inclusive, adjacent to current master plan project), acquire the land / land rights for that site, and design, permit, and build at their expense the project with payment made as supply contract for the commodity of restored acres. I've attached draft language for the plan modification to this comment.</p>
<p><b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/2e553d20-e65f-0134-3ef9-7e1156c8d040/Annual Plan mods for Pay For Success ESP.docx">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/2e553d20-e65f-0134-3ef9-7e1156c8d040/Annual Plan mods for Pay For Success ESP.docx</a></p>

**On page 47 after the Ongoing Programs insert:**

**New Initiatives**

Outcome Based Performance Contracts – The administration is seeking approval this legislative session to utilize Outcome Based Performance Contracts for the purposes of marsh restoration. If approved this progressive form of contracting will allow CPRA to utilize a competitive process to award a single contract to: finance, engineer, construct, and monitor marsh restoration projects. The contractor would receive payment only once established success criteria are met. Payment terms could extend for numerous years after the project success has been determined. Outcome based performance contracts shift risk of success onto the contractor and allows CPRA to utilize future revenues to construct projects now. A pilot marsh project of up to \$75M utilizing NRDA or RESTORE or GOMESA funding is expected to be awarded in FY18

**Within Table 3-4: Projected Three-Year Schedules for Active State-Only Projects**

Include a new project : Marsh Creation utilizing Outcome Based Performance Contract

**In Appendix B Table B-4 State-Only Project Expenditure (Non-Surplus)**

Include a category: Projects with Future NRDA, RESTORE, or GOMESA funds

Include a project: Marsh Creation utilizing Outcome Based Performance Contract

Include expenditures of \$75M in FY2018 with payment over multiple years per upcoming legislation.

<b>Public Comment Entry #:</b> 50
<b>First Name:</b> Acy
<b>Last Name:</b> Cooper Jr
<b>City:</b> Venice
<b>State:</b> LA
<b>Content:</b> Please see attached document for my comments.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 49
<b>First Name:</b> Glenn
<b>Last Name:</b> DeCuir
<b>City:</b> Lafayette
<b>State:</b> LA
<b>Content:</b> While I understand the need for all types of restoration it is disappointing to see no shoreline protection for the southwest coast in the master plan. I have property on Constance Beach and have seen the effectiveness the rock breakers provide allowing for dunes to be created and flourish because of this form of shoreline protection. The breakers also provide fish habitat which is a great. Shoreline protection should be a priority to protect our coast & marshes. Without it, marsh restoration will be next inline to wash away once the shoreline is gone.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 48
<b>First Name:</b> Jenny
<b>Last Name:</b> Robertson
<b>City:</b> Lafayette
<b>State:</b> LA
<b>Content:</b> Please keep shoreline protection language in the master plan. Louisiana can't afford to keep losing healthy marshes and land. Thank you!
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 47
<b>First Name:</b> Anne
<b>Last Name:</b> Babineaux
<b>City:</b> Lafayette
<b>State:</b> LA
<b>Content:</b> I support the Draft 2017 Master Plan for Coastal Protection
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 46
<b>First Name:</b> Anne
<b>Last Name:</b> Hollier
<b>City:</b> Lafayette
<b>State:</b> LA
<b>Content:</b> I have been to 2 of the 2017 La Comprehensive Master Plan road tours for Vermilion and Cameron Parishes. I was SHOCKED to see the shift from shoreline protection to marsh creation from the 2012 plan! It is imperative that we implement shoreline protection ASAP! I support the experimental process of testing methods for less expensive more successful shoreline protection while we still can! The shoreline protection at Holly beach is working!!!! Without the shoreline protection the marsh will die!  PLEASE CONTINUE WITH SHORELINE PROTECTION!  Anne Hollier
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 45
<b>First Name:</b> Kristin
<b>Last Name:</b> Engelbrecht
<b>City:</b> Lafayette
<b>State:</b> LA
<b>Content:</b> Please also consider focusing resources towards our coastline.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 44
<b>First Name:</b> Lori
<b>Last Name:</b> Henderson
<b>City:</b> Arnaudville
<b>State:</b> LA
<b>Content:</b> Please please please save our coast line, our wetlands and all costal marshes. We need these to protect the land from future storms for wildlife habitat.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 43
<b>First Name:</b> Peter
<b>Last Name:</b> Bulliard
<b>City:</b> Laf
<b>State:</b> LA
<b>Content:</b> Please secure our coastline.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 42
<b>First Name:</b> Aran
<b>Last Name:</b> Donovan
<b>City:</b> New Orleans
<b>State:</b> LA
<b>Content:</b> Please defend against the erosion of our coasts. We desperately need shoreline protection.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 41
<b>First Name:</b> Pat
<b>Last Name:</b> Gallagher
<b>City:</b> New Orleans
<b>State:</b> LA
<b>Content:</b> We must do more not less to protect and rebuild our coastline and we should start by holding Big Oil to their contractual obligations to fix what they broke.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 40
<b>First Name:</b> Matthew
<b>Last Name:</b> Sakakeeny
<b>City:</b> New orleans
<b>State:</b> LA
<b>Content:</b> Shoreline protections need to be added back to the master plan. The SW La. coast is being eroded inland by 300' a year. The healthy marsh is only 3/4 of a mile inland. Without shoreline protections that marsh will die. We need shoreline protection added to this plan.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 39
<b>First Name:</b> Robin
<b>Last Name:</b> Parrott
<b>City:</b> Walker
<b>State:</b> LA
<b>Content:</b> We need shoreline protection. We can't afford to lose anymore of Louisiana!
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 38
<b>First Name:</b> Autumn
<b>Last Name:</b> Cyr
<b>City:</b> New Orleans
<b>State:</b> LA
<b>Content:</b> We need shoreline protections in place to save the marsh and keep a healthy ecosystem!!!
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 36
<b>First Name:</b> Douglas
<b>Last Name:</b> Frey
<b>City:</b> Zachary
<b>State:</b> LA
<b>Content:</b> I'm writing to say that I fully support the 2017 Coastal Master Plan. While some critics argue that taxpayers shouldn't fund private marsh areas, I strongly disagree. The coastal marsh is not only a storm surge buffer that protects entire cities, but the marshes of coastal Louisiana also support a multitude of fish, shellfish, and waterfowl. I fish and hunt on public lands/waterways and without a doubt will benefit from this plan.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 35
<b>First Name:</b> Robert
<b>Last Name:</b> Gros
<b>City:</b> Leeville
<b>State:</b> LA
<b>Content:</b> I'm 100% in favor of saving our wetlands. I'm 100% against saving private property with public funds without public access on the waters for recreational use. If it's saved and no one can enjoy it, who gives a damn if it's there. Quit spending my money to save someone else's marsh!
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 34
<b>First Name:</b> John
<b>Last Name:</b> Monzon
<b>City:</b> Marrero
<b>State:</b> LA
<b>Content:</b> Thanks for presenting the 2017 master plan to the board of commissioners on the 21st of this month. During the presentation our board president, Susan Maclay, inquired about funding levee lifts on the West Bank and Vicinity projects. Currently, the West Authority is facing a \$10 million deficit in funding for the levee lifts prior to armoring projects. Does CPRA have any plans to assist the SLFPA-West in lifting/raising the levees in the future?  Your consideration will be greatly appreciated.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 33
<b>First Name:</b> Ray
<b>Last Name:</b> Parden
<b>City:</b> Albany
<b>State:</b> LA
<b>Content:</b> I do not agree with tax dollars being spent to restore private land in the marsh unless the tidal waters are made available to the public for hunting and fishing. We are the only state that lets private entities control tidal waters to prevent citizens from using them to fish in. How can you own water that is connected to the gulf... it's not land, it's water.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 32
<b>First Name:</b> Matt
<b>Last Name:</b> Fiske
<b>City:</b> Walker
<b>State:</b> LA
<b>Content:</b> I am in support of coastal restoration, however I am not in support of using public funds to restore privately owned land.  A large portion of the deterioration of our coastline is due to oil exploration. This exploration was conducted on privately owned land which the owners were well compensated for.  To facilitate this exploration they opened their land to public natural resources i.e. navigable water by digging an network of canals.  Now you are proposing to fix the problem with public funds for landowners that will not allow the public to use the natural resources that they have profited from for years as they helped to create the problem. The land owners and oil companies are responsible for a portion of the problem, therefore if public funds are to be used to fix then the public should have access to the public resources which they have enjoyed use and profit from.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 31
<b>First Name:</b> Rusty
<b>Last Name:</b> Jackson
<b>City:</b> Franklinton
<b>State:</b> LA
<b>Content:</b> Re: DRAFT 2017 Coastal Master Plan.  I am in support of coastal restoration but I am not in support of using public monies on private lands. Especially when those tidal waters and lands are being posted as private and the public is NOT allowed to fish nor navigate those free flowing tidal waters!!!!
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 30
<b>First Name:</b> Brian
<b>Last Name:</b> Daughdril
<b>City:</b> Youngsville
<b>State:</b> LA
<b>Content:</b> I do not believe that we should be restoring privately owned land. Our tax dollars should go to restoring public lands that everyone has access to. The state is not going to come mow my grass or fix my driveway because that is my property and my responsibility. Fix our public lands!
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 29
<b>First Name:</b> Jeff
<b>Last Name:</b> Glines
<b>City:</b> Howard
<b>State:</b> KS
<b>Content:</b> I enjoy fishing the marshes of South Louisiana and travel there twice a year.  I cannot continue to support a state that uses public money to restore private marshland destroyed by private companies/individuals who will then deny the tourist (me) access to fish those areas. I will take my money to Florida.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 28
<b>First Name:</b> Joseph
<b>Last Name:</b> Piechowicz
<b>City:</b> Mandeville
<b>State:</b> LA
<b>Content:</b> I appreciated the presentation in Mandeville last month. I would like to see a follow up meeting later in the year, but specifically tailored to what is happening in St. Tammany parish and nearby coastal areas, i.e. Rigolets, Lake Ponchartrain, Tchefuncte river outlet in Madisonville, etc.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 27
<b>First Name:</b> Megan
<b>Last Name:</b> Assaf
<b>City:</b> BATON ROUGE
<b>State:</b> LA
<b>Content:</b> Hi. I recently went for a visit to the coastline of Louisiana with some friends and learned more about what is being done, or not done, to ensure shoreline protection.  I do not want Louisiana to wash away.  Please add shoreline protection, such as near shore rock breakwaters, to the current Louisiana Coastal Master Plan.  Reducing the impact of the gulf currents and waves with shoreline protection just makes sense! It will ensure that inland restoration projects will have a better chance of succeeding, and reduce marshland erosion.  Thank you for your consideration. Please include it!!
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 26
<b>First Name:</b> Nettie
<b>Last Name:</b> McDaniel
<b>City:</b> Lafayette
<b>State:</b> LA
<b>Content:</b> I would like you to consider adding shoreline protection to the current Louisiana Coastal Master Plan. I saw photos of the areas of the coast which had light rock shoreline protection and the inland grasses and shoreline were not nearly as disturbed as the shoreline without protection. Reducing wave energy with shoreline protection will ensure that inland restoration projects will have a better chance of success and lessen marshland erosion.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 25
<b>First Name:</b> Susan
<b>Last Name:</b> Hester Edmunds
<b>City:</b> New Iberia
<b>State:</b> LA
<b>Content:</b> To whom it may concern:  I am writing to ask the review committee to add shoreline protection to the Coastal Master Plan. Our coastal marshes are invaluable for so many reasons--the nursery for our beloved seafood, habitat for wildfowl and mammals and also storm surge and hurricane protection for coastal communities. In addition if inland coastal restoration projects are to succeed long term, the steady wave and wind erosion of our coastline needs to be halted or else the restored marshes will just eventually be washed away.  Thanks for your time in considering my comments.  Sincerely, Susan Hester Edmunds
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 23
<b>First Name:</b> Martin
<b>Last Name:</b> Floyd
<b>City:</b> Cheneyville
<b>State:</b> LA
<b>Content:</b> Please add shoreline protection, such as rock breakwaters, to the most recent LA Coastal Master Plan. Reducing waves energy ensure that inland restoration projects will have a better chance of success. All restoration should remain in the toolbox so that projects can be tailored to what can actually solve the problem.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 22
<b>First Name:</b> Amy
<b>Last Name:</b> Andaya
<b>City:</b> Carencro
<b>State:</b> LA
<b>Content:</b> Please add shoreline protection, such as near shore rock breakwaters, to the current Louisiana Coastal Master Plan. Reducing wave energy with shoreline protection will ensure that inland restoration projects will have a better chance of success and lessen marshland erosion
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 21
<b>First Name:</b> Jeff
<b>Last Name:</b> Wilson
<b>City:</b> Mandeville
<b>State:</b> LA
<b>Content:</b> I would like to see a more aggressive schedule for the protection structure at the Rigolets for Lake Pontchartrain. This could be done by stepping away from some of the new levees and adding new lifts to existing levees around the lake. Is the 50 billion dollar budget include USCOE projects? The losses and insurance payouts should be used to lever more money for the protection around Lake Pontchartrain. I fear that with the additional levees in St. John Parish, St. Tammany, Tangipahoa and Livingston Parishes are going to get more water. During Isaac, water was within 1 _” of getting in my house.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 20
<b>First Name:</b> Thomas
<b>Last Name:</b> Thompson
<b>City:</b> Eden Isles
<b>State:</b> LA
<p><b>Content:</b> Request All St. Tammany Parish Projects Be Placed On Hold Until The CPRA's Parish Reconnaissance Study Is Completed. The Proposed 2017 Master Plan Projects Have Not Been Approved By The St. Tammany Levee Board Or Undergone A Public Review/Comment Process Or Environmental Studies Or Modeling.</p> <p>Justification for placing all St. Tammany Parish Government's proposed CPRA Projects on hold until the CPRA's Parish Reconnaissance Study is completed and approved by the St. Tammany Parish Levee Board:</p> <p>1 - St. Tammany Parish Government is requesting \$362,694,957 for marsh creation along its coast line. The marsh creation projects do not provide flood protection, lower base flood elevations or reduce flood insurance rates. In addition, the marsh creation projects are of little or no value since the CPRA has concluded the potential land loss, in this area, over the next 50 years, under the medium environmental scenario, with no further coastal protection or restoration action, is minimal.</p> <p>In reality the proposed marsh creation projects may increase flooding. Case in point are the marsh creation projects at the mouth of bayous and rivers that may restrict out flow and create increased flood levels up stream. Certainly the Parish's "Faciane Canal Marsh Creation" project at the mouth of Bayou Bonfouca and Bayou Liberty has the potential to restrict outflow into the lake and create up stream flooding of populated areas. The Parish is proposing these marsh projects without valid studies evaluating potential flood risk.</p> <p>The CPRA's 2017 Master Plan Attachment 9, Parish Fact Sheet, page 45, states:</p> <p>"St. Tammany Parish faces minimal potential land loss over the next 50 years under the medium environmental scenario with no further coastal protection or restoration action. However, with no future action, the southern portion of the parish faces increased future storm surge based flood risk. Over the next 50 years (under the medium environmental scenario), 100-year flood depths increase substantially to 7-15 feet and above along the Northshore of Lake Pontchartrain. The towns of Mandeville, Lacombe, and Slidell all face increased risk."</p> <p>Based upon the CPRA's assessment of the minimal potential for land loss and the increased future storm surge flood risk, why is St. Tammany Parish Government requesting \$362.6 million for marsh creation instead of surge protection projects?</p> <p>2 - The Slidell Ring Levee is being built without an Environmental Impact Study or modeling to evaluate its impact on communities just outside of the Slidell limits. It is obvious that the levee will increase flooding in communities just outside of Slidell city limits. The extent of the increase flood</p>

risk is unknown. This project goes against sound engineering standards and makes not only the Parish but the State liable for the flood damage the Slidell ring levee will cause.

3 - Other than the Slidell Ring Levee, the only other surge protection projects St. Tammany Government is proposing is elevating or buying out homes and businesses. The number of structures listed for buyout or elevating within the designated area are grossly under estimated. For example the number of homes located within the small four square mile area south of Slidell between Highway 11 and I-10 has over 3,000 structures that would cost almost one billion dollars to elevate even if it were practical to do so, which it is not. St. Tammany Government's position to elevate or buying out homes and businesses without first studying the possibility of developing more cost effective methods of surge protection for these locations does not make sound economic or engineering sense.

St. Tammany Parish Government submitted its list of projects without going through a proper environmental assessment or review and comment process. Now that a St. Tammany Parish Levee Board has been established all St. Tammany Parish environmental, drainage and flood projects, located within the levee district, should go through the proper review process and Levee Board approval before authorization is given.

Thomas Nolan Thompson  
217 Windward Passage  
Eden Isles, La. 70458  
thomasthompson@yahoo.com  
985-285-1768

**Attachments:**

<b>Public Comment Entry #:</b> 19
<b>First Name:</b> Thomas
<b>Last Name:</b> Thompson
<b>City:</b> Eden Isles
<b>State:</b> LA
<p><b>Content:</b> Request Redistribution of Resources</p> <p>At the Master Plan/Annual Plan Public Hearing on Wed, Jan 25, 2017 in Mandeville, it was stated that CPRA resources have been equally divided between environmental projects such as marsh creation/cultural heritage projects and flood protection projects.</p> <p>Marsh creation for wildlife, recreational and commercial activity is important, but without a human population to benefit from these environmental activities their value is greatly diminished.</p> <p>When weighing the value of human life versus the value of wildlife, recreational and commercial activities - human life must be given a higher priority.</p> <p>Marsh creation does not protect people from storm surge.</p> <p>Marsh creation does not protect people from sea level rise.</p> <p>Marsh creation does not lower FEMA's flood insurance rates.</p> <p>Without a combination of surge and sea level rise protection and affordable flood insurance our coastal human population will disappear regardless of how much marsh has been created. GNOinc's January 27, 2017 Coalition for Sustainable Flood Insurance white paper emphasizes the critical need for human protection projects.</p> <p>I request a master plan that puts human life above wildlife habitat and recreational activities. I support a more humanistic distribution of resources; such as 25% for environmental projects and 75% for real flood protection projects.</p> <p>Thomas Nolan Thompson 217 Windward Passage Eden Isles, La. 70458 thomasthompson@yahoo.com 985-285-1768</p>
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 18
<b>First Name:</b> Thomas
<b>Last Name:</b> Thompson
<b>City:</b> Eden Isles
<b>State:</b> LA
<p><b>Content:</b> Request The Lake Pontchartrain Barrier Structural Project Be Designated The CPRA’s “Number One” Priority And Total Effort Be Made To Fast Track Its Implantation</p> <p>The Lake Pontchartrain Barrier Structural Project is the most important, cost effective project in the state.</p> <p>Both the Corp’s 2009 study and the CPRA’s 2016 study document that low level, overtopping structures at the Rigolets and Chef Passes will significantly reduce storm surge within the Lake Pontchartrain Basin without causing significant impact to populated areas of Mississippi.</p> <p>If the Corps ever releases its Environmental Impact Statement showing the full impact “ALL” their structures have had collectivity on the surrounding Lake Pontchartrain Basin, then the Corps will be required to mitigate that damage and the Lake Pontchartrain Barrier Structural Project can be “Fast Tracked” for construction.</p> <p><a href="http://youtu.be/PkmatvfMIRk">http://youtu.be/PkmatvfMIRk</a></p> <p>The CPRA needs to push for this “Fast Track” solution for this most critical project in the State.</p> <p>Thomas Nolan Thompson 217 Windward Passage Eden Isles, La. 70458 thomasthompson@yahoo.com 985-285-1768</p>
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 17
<b>First Name:</b> Jimmy
<b>Last Name:</b> Babin
<b>City:</b> Saint Amant
<b>State:</b> LA
<p><b>Content:</b> The Great Flood of 2016</p> <p>And how it could have been avoided!!!</p> <p>The problem started with the rain that fell within 3 days of over 30 inches due to a cell setting over us from the Gulf of Mexico. Starting on the day it started raining, the next problem is growth of all the areas that is now concrete and asphalt with large drainage ditches to carry the water away until they started backing up because all the drainage below that has not been kept up with as it is improved up stream and “out of sight out of mind” downstream. Even an old farmer knows when he plants a garden, he has to dig a drain for it that goes to the lowest area and maintain that thru out the years.</p> <p>The fix for all this problem is really very simple and in each parish and town there is a Drainage Department! In that Drainage Department should be a plan for once the water is draining away from that community it needs another place to go. This is not engineering or science, it is common sense. Water will seek its own level as we all know, but it also flows downhill. And somewhere downhill there is a place for it to find that level, wherever you design it to go.</p> <p>Spending money on protection is what we all do when we buy insurance and these companies have to make money to support their big habits. They charge you for the risks they are about to take and will respond a lot slower paying it out than they do collecting it or re-investing it to make more until they need it. So in the end it is still the individuals that work for a living and would like to have nice homes and vehicles that really pay the price.</p> <p>All this being said, with the taxes we pay and the insurance we pay, really needs to be re-evaluated to paying out for insurance or prevention. Everyone has this safety thing shoved at us daily, weather it is on the job, behind the wheel, or medical for better health. If they can tell us poor folks how to be safe, they need to start practicing what they preach.</p> <p>The first response by the people is to quit building and adding more people to our communities that clear and raise lands that once held the water. I feel that is the wrong thing to do. We should all encourage growth be it residential, commercial, or industrial. These are the areas that improve our tax base and way of life that adds not only to schools, but highways to aid in traffic flow, and drainage that works. This flood has a financial impact of \$3.5 Billion just for the devastation and an estimated \$4 Billion in loss of revenue from taxes and relocating the people affected. This is just to name some. Wouldn't this money been better used in a protection method than a rescue and recovery method?</p> <p>In this article, there are some concepts pulled together by people affected by this flood that will help to get this problem resolved so the next time we have a lot of rain, it will not impact so many people. Those of us that live on the rivers pay the price for flooding, but not to the magnitude this event caused.</p>

There are areas that were not in a flood zone that took on more water than some that lives on the river. Government feels that building levees with pumps and retention ponds is the answer to the problem. During this flood it was proven it did not work. So let us discuss these areas.

1----- The Comite Diversion canal has been ongoing since 1985 and is still a long ways off to completion. This project has been hammered by politics, lawyers, engineering, DNR, and Corps of Engineers. Money has been taken from the project and more restriction added to it with much more revenue required to complete it. Somewhere this has to stop!

2----- Each Parish should be held accountable for their water discharge and held liable for a lawsuit if it damages their neighbors downstream. For every action there is a reaction and when you design something upstream there should be a plan for the downstream to function properly and the price should be shared and supported by the state. For an example of Bayou Manchac should be opened up and linked to the Mississippi River with flood gates and pumps so water can flow both ways to aid in draining Baton Rouge and also sending fresh water into the swamps and rivers to help keep our swamps alive.

3----- Spanish Lake was drained and more homes built which bit the home owners hard. Then draining that area was a slow process. This plan should have been thought out a lot more before that process happened. There is a way to fix that process also if we just think about it. Adding flood gates and pumps may not do the job.

4----- The Amite River flooded Denham Springs due to the fact it being silted in below and could not drain. That could be an easy fix!

5----- Other drainage canals leading to the Amite from Walker area was clogged up which made that area back up and the wall in the middle of I-12 was a disaster!

6----- The Port Vincent bridge holds back a lot of water flow so it would be necessary to start another drain area around that area buy putting a canal above that bridge and below Bayou Manchac that can help get the water on down quicker. It could run along the existing levee and the spoils bank could add to the reinforcing of protecting levee and bring it all the way to Pit Amite so it can discharge between Blind River and the Diversion Canal.

7----- Coyell Canal is another area that needs cleaning out to allow drainage from Livingston Parish

8----- The Amite River at the weir needs to have the corner cut back and rounded out to encourage the water to travel down the Amite at that point. The river also needs to be cleaned out all the way to Lake Maurepas as it is silted in and logs and stumps need to be removed.

9----- Blind River where the Diversion Canal enters is sanded in all the way to Lake Maurepas and needs to be cleaned out. Also Blind River needs to be brought to the Mississippi River to help keep the water off St. James area. There again it needs pumps and locks to allow water to go into the Mississippi River and also fresh water from the Mississippi to flow into Blind River to assist in improving the swamps growth.

10----- The pass at Manchac is restricted too much to allow the water to flow out at a time of need. There should be some flood gates installed so as to regulate the fresh water flow into Lake Ponchatrain and restrict the flow at times of storm surge so as to avoid salt water intrusions into Lake Maurepas. We already have a problem with salt water intrusion in our drinking water and this will help slow that process down.

These are just a few of the items to look at to assist in making the flood waters go down faster, reduce flood insurance requirements, amount of money the government has to pay out to the residents, give the government a more stable tax base, and improving our quality of life!!! What more could anyone ask for?

Things that get in the way of expediting this project and drive up cost:

1----- DNR and Corps of Engineers will study this to death and drag the project on for years.

2----- Engineering firms will take too long getting the plan together must less all the approvals from every fish and tree lobbyist at the capital. There needs to be a firm or group working on each phase at the same time with one person overseeing the entire picture.

3----- Multiple contractors will be required to accomplish this project and a clear scope of work to eliminate over runs and get job done on schedule.

4----- In doing anything digging in the dirt, river, or swamp there are many organizations that get in the way and will need to be kept away from this project due to dragging it out too long. This is a must to expedite this project due to the urgency to stop flooding as we have just seen. If there is an animal or tree in danger by this project being done, what about the human life? There must be some sacrifice to save properties and lives from this devastation.

5----- All our politicians needs to get behind this quickly to appropriate the money required and shove it thru on an expedited basis and other than that roll up their sleeves, put on some work boots, and get on the project site to physically see what goes on and help with short cut solutions.

Frustrations and inadequacies are proven during this flood and needs to be addressed.

The Comite Diversion Canal is a prime example of how long it takes when everyone is in the way. Since 1985 until 2016 and still a long way off is unacceptable and a crying shame!!!

The way FEMA has handled this flood is unacceptable!!! There was too slow of a response all the way around. And when the citizens take matters in their own hands to start a rescue procedure (Cajun Navy for example along with friends and family) they were criticized and requested to go to a class and obtain a license to do what us hometown folks do naturally.

The money plan to get people back into their homes is a joke!!! Dragging out payments weather from insurance companies or FEMA and the requirements you have to meet when you have lost everything is absolutely unacceptable! The problem is too little, too late, and frustrating rules. These entities needs to be forced by law to respond quickly. If you didn't pay your taxes or insurance, you are notified promptly and also the bank that holds your note where your note will be called or an expensive policy will be purchased for you or a lien placed on your properties and bank account.

The FEMA trailers and a shelter in home has proven problematic and needs to change. At the price of +/- \$130,000 per trailer and +/- \$15,000 for a shelter in place could be spent better by giving the people the money to start with as just like in the rescue mode, it is proven the people will do a better job themselves. They may need some guidance like a list of qualified contractors or house / camper trailer dealers within a 250 mile radius so they can get their own. Also the permits to put these units in place take too long!!

The local government cannot even get their plan together on deciding what to do with a home or even estimating amount of damages! There are people already back in their home after a rebuild and then get a letter from the parish they have to elevate or demo their home is very disheartening and inhumane!!!

**Attachments:**

<b>Public Comment Entry #:</b> 16
<b>First Name:</b> foster
<b>Last Name:</b> creppel
<b>City:</b> Myrtle Grove
<b>State:</b> LA
<b>Content:</b> a few minor changes to previous attachment.
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/1d3243d0-c713-0134-1413-463ef785f274/Letter to the e.docx">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/1d3243d0-c713-0134-1413-463ef785f274/Letter to the e.docx</a>

Plaquemines Parish, the last 100 miles of the Mississippi River Delta, “The epicenter of wetlands loss”, Chip Cline.

My name is Foster Creppel and my parents and I bought Woodland Plantation 20 years ago, January 22, 1997. During those 20 years, I have watched the population and land mass shrink at an alarming rate all the while building a successful tourism business half way between New Orleans and Venice. Woodland is dependent on a healthy estuary and fishery. Most of our customers are from other states and come here for the fantastic fishing, hunting, birding, citrus, wonderful food (seafood), culture, and history. When I started restoring Woodland most locals thought it wouldn't survive and that I was crazy, “who will want to visit here?” they asked and to be honest, I had doubts myself. It took much longer than anticipated and a lot more money but with persistence, hard work, a strong will and patience we thrived.

When Europeans came to Plaquemines it was an estuary that was building land. Deltas and estuaries are dynamic and always in flux. They're made off cypress swamps, distributaries, Chenier's, fresh and salt water bayous, grasslands, bays, oyster banks with trillions of oysters as far as one could see where the salinity was right. At one time, there was 65 plantations south of New Orleans. It was a very fertile, rich environment. After the plantations were gone we clear cut the cypress swamps. We dredged logging canals into the cypress forest that allowed salt water in. While doing so we destroyed the windbreaks and freshwater environments that filter the river water and where algae is supposed to exist. Then when the steam engine came into play they oyster banks had no chance, we harvested trillions or oysters in a destructive manner. These vast reefs provided a buffer from storm surges. They occupied an area where the delta met the sea. They were the bulkhead of our delta. Then in 1934 the Corps of Engineers built the levee constraining the river that built our delta and all of Plaquemines Parish. It cut off all the distributaries Bayou Lafourche, Bayou Terrebonne, bayou barataria, bayou des familles and many more were cut off from their source.

Then, in the 1930s came the oil and gas industry. Other than levee building my family has been involved in all these industries.

All of these activities by man are what have led Plaquemines Parish to the point where it is today, a dying place, unable to support the people that depend on it, in the critical care unit with the coastal master plan as its life support system. Now we find ourselves asking congress and the rest of the United States to help us restore our coast. We know it's going to cost billions of dollars but the three main culprits, and believe me I know the blood is on all of our hands, are still engaged in harvesting the delta in a destructive manner. There is not enough money in the world to save our coast if we continue to destroy it. We're continuing to dig vast holes between the front and back levees to build more levees that almost every scientist tells us is going to sink into the sea. It doesn't make sense.

We have to understand where we live. The brown shrimp is an invasive species, we're going to not introduce fresh water to protect an invasive crustacean while we are washing away? We have siphons and diversions that we aren't using because of pressure from special interest groups. We spent millions of dollars on these projects, yet don't use them. It doesn't make sense.

We should start lowering our levees, raising our houses and reintroducing the river, that built our coast. My insurance agent tells me every year I live on a flood plain. It is supposed to flood. We should start building levees perpendicular or at 45 degree angles from the river like the old river distributaries and oak ridges once were. We should encourage and help farming oysters in suspended cages, we should pay oyster fishermen to help us rebuild our natural oyster reefs not for harvesting but for coastal restoration and preserves. We need to all work together if we are going to survive here. It is a daunting challenge we are facing but with understanding, commitment, cooperation, political will, patience, sacrifice and time we may thrive again. I'm an optimist.

<b>Public Comment Entry #:</b> 15
<b>First Name:</b> Alvin
<b>Last Name:</b> Samuels
<b>City:</b> Metairie
<b>State:</b> LA
<p><b>Content:</b></p> <ol style="list-style-type: none"> <li>1. BP operations are still suspect there claim to faster lower cost is a warning signal.</li> <li>2. Oil muds are much more expensive and make kick detection much more difficult and harder to control.</li> <li>3. LSU Kick training using oil vs water muds should be mandatory.</li> <li>4. EVTN oil/water/solid separators should be strategically located in the active drilling areas. (I am a stockholder)</li> </ol> <p>By way of example my last well drilling experience involved drilling 25 miles east of the BP blowout. 23,000 feet in 18 days using a low solids, water based fluid. (fastest ever) and repeatable with properly trained crews.</p> <p>After this well I was one of three Staff Drilling Engineers transferred to Shell's Deep Drilling Study Group (25,000, 350 degrees + 50% H<sub>2</sub>S.) Discovered unique reactive iron oxide, Founded Sulfatreat then sold company to Schlumberger/Smith.</p>
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 12
<b>First Name:</b> Curtiss
<b>Last Name:</b> Price
<b>City:</b> Morgan City
<b>State:</b> LA
<b>Content:</b> Gentleman, I have read articles in the daily paper. First I do not understand spending millions of dollars on diversion projects, when they are not put to use. What would the poor Fisherman would say if natural channels were opened up. ( Bayou La Fourche, Laffite Channel, Buras Lock Channel, plus a few more all on West side of River) it is amassing what this would do to ward building off land on our coast. xxxxxxxxxxxx I want to get to the subject of spoil bank dredging, and where to get the material to build our coastal Marshes UP to stop salt Water intrusion. When I was living back in the 1941 to today, Atchafalaya River ran from Morgana to the Gulf of Mexico through two very large lakes, Grand Lake and Six Mile Lake. Where are these lakes now? They are silted in to where there is only a channel for the river and Calumet Cut. How many cubic yards of silt there is that could be used to build our coast. The hundred of million dollars going to be spent on ineffective ways, WE could pump spoil silt through Plastic Pipe down south to save Houma and points south from the next Major Hurricane. There is a time line attached. Like Yesterday. Spend where WE can get the most for our dollar. I am sure there will be many saying this would destroy the Basin, I say bring it back to what it used to be in its glory days. Atchafalaya River was at one time over 100 feet deep. Now We have to fight to get money to keep to at 22 feet. What a revolting development WE are in. I am 75 years young. I can see US losing all below Intercoastal Channel below Houma and east of Bayou Bouf, IN MY LIFE TIME. Money for Bayou Chane flood gate was left out, WHY? Could go on But Hy. Dept. need more money to build another bridge across Mississippi River.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 11
<b>First Name:</b> Angela
<b>Last Name:</b> Guidry
<b>City:</b> Grand Chenier
<b>State:</b> LA
<p><b>Content:</b></p> <p>As a lifelong resident of lower Cameron Parish, I have witnessed shoreline loss in my short lifetime. As a child, my mother told countless stories of the cattle pasture south of Hwy 82 in front of her parents home. She learned to drive a truck in that pasture as a child. In her lifetime that pasture was reduced to open salt water. Why? The answer is simple. Levees were constructed, salt water was introduced during high tide events and the natural drainage pattern was altered. Couple that with the alarming rate that we are losing our shoreline in Southwest Louisiana. I currently live on that property my mother grew up on. If we don't use our resources to protect the shoreline here and return our natural drainage patterns in our marshes, Hwy 82 will be our beach front property in my or certainly my son's lifetime. That would be a total land loss/transformation across 3 generations. That type of habitat loss and change is unacceptable to me and should be the citizens of Louisiana. All too often the largest portion of the restoration dollars are spent where the largest population of our state lives. Southwestern Louisiana has been overlooked for projects for too long. our fragile ecosystem can not tolerate continued abuse.</p> <p>As a college student, I left Louisiana to pursue a PhD in soil chemistry. I returned to family property 12 years later, after earning my degree and working in several jobs. I brought back a greater appreciation for our little slice of heaven in lower Cameron Parish. It is my hope that my son's children will one day be able to enjoy and appreciate the resources we have at our disposal here.</p>
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 10
<b>First Name:</b> byron
<b>Last Name:</b> almquist
<b>City:</b> metairie
<b>State:</b> LA
<b>Content:</b> \$15 fee to park a car. !!!!!!! really offensive  We were looking forward to attending the public meeting in New Orleans on Jan 18th but when we found it that it would cost \$15 to park our car, we went home. The Port of New Orleans was an extremely poor choice for the New Orleans hearing. It was hard to find and there was no public parking. The master plan may or may not have some merit but we will never know.  The announcement about the date and the location of the public hearing should have included the information that there was no public parking available. It would have been wise to also included the information that private parking was available for \$15 per car. I wonder how many other people were so offended by the lack of public parking that they also went home.  I think the failure to inform the public about the lack of public parking speaks very poorly of whoever planned this event - and taints the entire master planning process. If a public hearing cannot be handled property, how the the coast be restored????
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 9
<b>First Name:</b> Craig
<b>Last Name:</b> Colten
<b>City:</b> Baton Rouge
<b>State:</b> LA
<p><b>Content:</b> The 2017 draft contains some noteworthy improvements and boldly acknowledges climate change as a factor in rising sea level and the impending threat it poses to our coast. It is clearly illustrated and generally well edited. It is a useful document for a portion of its stated purposed, but has shortcomings that I outline below.</p> <p>From the very outset, p. ES-2, the document reveals a stark contrast between natural biophysical processes and human-induced processes. There is a list of several “natural” processes compared to only two examples of human related processes: “disconnecting the Miss River from coastal marshes, and human impacts.” The disproportionate attention given to biophysical dimensions over human dimensions continues through out the document, and thereby diminishes the need to incorporate social sciences and humanities in a more robust and parallel manner. The entire enterprise that drives CPRA and the Master Plan is inherently a human endeavor, and thereby demands attention to and inclusions of the social sciences and humanities.</p> <p>P ES-6 - the discussion of flooding makes no mention of human decisions to continue living in flood prone locations, of the policies that promote such decisions, and even more importantly of the permitting of activities that created this perilous situation for residents. Where is the sociological, anthropological, political, geographical, and historical analysis of this situation? Any plan dealing with restoration and protection of the coast should concern itself with the people who live there and the manner by which they make decisions regarding where they live and how they earn a living.</p> <p>Fig. ES-2 - this map fails to depict the true geography of human settlement in the coastal region; the identification of a few towns does not show the geographic distribution of where people live and work. It does not reveal the extend of the relationship of land loss to residents and economic activities.</p> <p>Fig ES-3 - this map also fails to show the relationship of coastal populations (according to the text on ES-8 – “millions of people”); where are those people, how much will they be impacted?</p> <p>P ES-11 - In reference to the scale of development, we are encouraging the scale of development now taking place? One must question whether or not that is sensible? How much of that investment could be made more prudently farther inland, reducing costs and the need for some of the coastal investments? There will still be a working coast, but one with safe people and infrastructure if we encourage inland activity.</p> <p>P ES-13 – “this abundance is only possible because our coastal wetlands provide habitats . . .” I wonder how this statement and the current plans to build two large diversions (Mid-Barataria and Mid-Breton ??) square with maintaining habitat. Barataria is a major shrimp habitat and oyster lease bay that will endure major ecological changes when the sediment diversion is opened.</p>

P ES 16 - the explicit mention of estimates for the number of potential voluntary acquisitions is a major step forward from the 2012 master plan; while still inadequate, the expanded discussion of non-structural options is a tentative step forward.

P ES-19 - this document would benefit from a robust discussion about the numerous examples of coastal populations who had learned to live with water only to have to relearn to live with different water over the past several centuries; levees and outlets have altered the ecology of the coastal marshes and swamps and those who made a living from resources there have adapted repeatedly as stronger and more expansive flood control programs were put in place, likewise as oil exploration and extraction have transformed the landscape and habitats, residents have adapted, but without compensation or assistance (in most cases).

p 28 - the 2017 master plan retains an unbalanced focus on science and engineering. Environmental management and indeed science and engineering are human enterprises and involve complex social processes, the millions of people living on the coast, those living in “our local communities” are neglected by the narrow emphasis on science and engineering, a huge part of the problem can be more appropriately addressed with social sciences and humanities, use of the “best available” social sciences and humanities would make the master plan a more socially attentive and responsive document for the residents of Louisiana.

p 29 - again, where is social science and humanities in the “state of the art” analysis, the 2017 master plan efforts, as previous versions, has a “solid scientific and technical foundation” but it is noteworthy in the absence of a comparable foundation in humanities and social sciences.

p 29 - there are public outreach programs, but I see nothing about truly public participatory methods (a prominent specialization in social sciences/humanities).

Adaptation, as a tactic, appears to have an enlarged role, this is sensible.

Are the various stakeholder committees equally weighted? My last review of several committees suggested that landowners and industry organizations had a larger presence in the stakeholder ranks, and generally professional representation.

p 53 - Recent scholarship has shown that one of the glaring weaknesses in our state’s resilience has been an inability to mesh local traditional resilience with formal top-down government/corporate resilience programs. How fully connected are local organizations in the Flood Risk and Resilience Subcommittee? What are the mechanisms for the formal resilience programs to integrate with the informal, local practices?

During the past year I frequently visited the CPRA web page calendar to see listings of the various community meetings. They were not posted at several times I tried to get particulars on those meetings.

With all the modeling, how has CPRA factored in the vagaries/uncertainties of the expanding fiscal conservatism at all levels of government?

The population growth scenario of .76 % is unrealistic, particularly given, as you note, the growth rate was 0% between 2000 and 2010, and with impending disruptions due to restoration projects and sea level rise, a decline is more likely.

P 79 - caption (lower right) acknowledges that costs are not just financial - how does CPRA factor in what counts to local residents, and not just what can be counted in its standard metrics? The metrics rely quite heavily on standard economic/financial accounting.

P 82 - where is the justification for the 50/50 split on restoration and risk reduction? It seems the 50 percent for restoration over values ecosystems/biophysical processes and seriously undervalues human dimensions - including livelihoods, safe residences, and culture preservation/restoration.

p 87 - some of the concerns of residents expressed in the CPRA-funded scenario-building workshops emphasized long-term commitment to restoration funding and scaling projects to fit local livelihoods and communities are not included/mentioned here.

P 92 - nonstructural budget remains a small share of the total budget.

p 98, fig 4.7 - what is missing here is the damage/disruption to current local economies/livelihoods that will result from restoration projects, in particular the Morganza to the Gulf (p 99, fig 4.8)

p 100-101 - risk reduction maps fail to clearly depict human populations that will or will not be benefitted by risk reduction.

p 103 - again metrics fail to go beyond the standard economic measures, where are the true social/cultural costs?

P 129 - relying on “future disaster-based funding” for non-structural mitigation greatly diminishes the likelihood of any regular funding and continues to rely on funds for structural projects at the expense of more cost effective non-structural options. Waiting for disaster-based funding has been Louisiana’s traditional, and largely after-the-fact approach. For example, the current spending plan for the August 2016 flood recovery heavily invests in redeveloping on the flood footprint and neglecting long-term mitigation. The master plan can do better.

P 131-2 Discussion of mid-Barataria diversion makes no mention of the type of community participation and engagement recommended by the CPRA funding report by the Water Institute of the Gulf on Social Impact Assessment.

P 134 - the 2017 non-structural discussion contains a confusing statement - in terms of the “total structures” - it appears that this is actually a structural; also if the risk reduction program employs the best available climate science (which is entirely appropriate and certainly wise), where is the best available social science and humanities on how people will deal with the non-structural program?

P 138 - the LA SAFE project is a worthy addition, even though a bit tardy.

p 146 - while adaptive management offers a flexible approach that builds in on-going monitoring, assessment, and adjustment to ensure improving performance, it turns the Louisiana coastal landscape in to a giant outdoors laboratory experiment. We have been doing this to some extent (albeit without the built-in mechanisms for adaptation) for years without great success in terms of flood protection and coastal management. It smacks of hubris and neglects our past failures.

#### Appendix B: People and the Landscape

p 7/8 - I would like to encourage CPRA to diminish the bold statement that there is time for communities to plan for the future if we are asking people NOW to invest funds in coastal

restoration, then it is time for communities to begin planning and carrying out those plans. Just as it takes years to design and permit engineering projects, making resettlement a viable option and carrying out such actions also takes time. The time frame is seriously discounted here.

P 9 - the rising cost of flood insurance alone should reinforce the need to begin active and aggressive planning for relocation/resettlement for both safety and economic viability of coastal residents.

p 10 - the extraordinary repetitive flood losses underscores the inadequate incorporation of human dimensions in previous master plans and inadequate efforts carried out at the local level; the map does not distinguish between coastal flooding, inside the levee flooding in urban areas due to precipitation, and riparian flooding which is confusing when used in this context. Much of the repetitive costs are in the urban New Orleans area and within river/hurricane protection levees. Flooding in those areas has much to do with failure to implement sensible land use planning and lapses in meeting NFIP standards \_ or human not nature induced damages.

P 13 - the challenge to conventional wisdom is a useful statement, and should be used to provide a more assertive set of planning and policy tools to assist resettlement in safe zones, no such information is provided in the master plan (that is: where are the safe areas?)

P 27 Is the 100-year flood depths elevation safe?

P 29 what level of protection for traditional fishing villages and what level of support for agricultural communities? Why select a lower safety standard for strategic assets and historic properties? (50 year flood) Why neglect social and cultural infrastructure that enable communities to survive? No mention here.

**Attachments:**

<b>Public Comment Entry #:</b> 8
<b>First Name:</b> Robert
<b>Last Name:</b> Dupuy
<b>City:</b> New Orleans
<b>State:</b> LA
<b>Content:</b> As a 30 year USCG Captain I have spent many years at our barrier islands, all of the sand from the disappearing Chandelier, Curlew, Gosier & Breton Islands is now deposited behind these islands in Chandelier & Breton Sounds, all that needs to be done is to operate dredges 24/7 pumping all the sand back onto these islands & even connecting them all together. The Dredges could be operated as state prisons where the inmates would actually work & learn a new trade. Please no more studies, start pumping sand!
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 7
<b>First Name:</b> Kenneth
<b>Last Name:</b> Ragas
<b>City:</b> New Orleans
<b>State:</b> LA
<p><b>Content:</b> Dredging/Pipelining (DP) cost versus Sediment Diversion (SD) cost: Please calculate the DP cost versus the SD cost using the DP cost that was used on CWPPRA Project BA-68 / CPRA Project 002.CO.01 to compare DP vs. SD.</p> <p>The noted Grand Liard Marsh/ Ridge Restoration project borrow cost was \$6/cu. yd. The borrow was sourced from the Gulf of Mexico near shore of the Sandy Point area. Based on sampling data taken from the USGS Geological Survey Data Series 344 (Sandy point to Belle Pass) the quality of material from near shore of the barrier islands is ideal for restoration projects. Also, the Community Conversations program is greatly appreciated. Will the CPRA consider the recommendation of the Expert Panel on Sediment Diversions to use an independent facilitator for future community involvement?</p> <p>How much information is available to the stake holders of Southeast Louisiana? Is the SD computer model available for an independent scientific analysis and validation?</p> <p>Please find attached the noted USGS Survey Series 344 and the Expert Panel's Recommendations.</p>
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 6
<b>First Name:</b> Steve
<b>Last Name:</b> Oertling
<b>City:</b> duson
<b>State:</b> LA
<b>Content:</b> We have been waiting for years for the rocks to be extended pass Long Beach, Johnson Bayou, La. We have lost of 200ft of beach and our rd washes out couple times a year. Our camps are +- 30ft from wave action on high tide. It wont be long before there washed away. I thought maybe now with all the BP money we would get it done since its supposed to go to coastal restoration not these inland water projects. Please let me know what to do.
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 4
<b>First Name:</b> Gary
<b>Last Name:</b> LaFleur
<b>City:</b> Thibodaux
<b>State:</b> LA
<b>Content:</b> Colleagues, Thanks for all the hard work on this document. I appreciate that you have compiled Parish Fact Sheets. These are useful and concise. However, on the second sheet of each Parish Summary you have included a graph with Square Miles on the Y-axis. It would be easier to compare these between parishes if they all had a minimum value of Zero on the Y axis, and if they all had the same Maximum value, such as 1000. For instance, setting the max and min values at 1000 and 400 for Lafourche, but 600 and 200 for Plaquemines makes these two graphs quite hard to compare. Good luck fighting the good fight, g
<b>Attachments:</b>

<b>Public Comment Entry #:</b> 3
<b>First Name:</b> KENNETH
<b>Last Name:</b> RAGAS
<b>City:</b> New Orleans
<b>State:</b> LA
<b>Content:</b> Is the sediment load of the MR been updated from the data in the attachment?
<b>Attachments:</b> <a href="https://citizenreach.s3.amazonaws.com/uploads/attachment/file/78dcaa70-b3ff-0134-066d-62e4006a8a7b/Estimated_Sediment_Load.jpg">https://citizenreach.s3.amazonaws.com/uploads/attachment/file/78dcaa70-b3ff-0134-066d-62e4006a8a7b/Estimated_Sediment_Load.jpg</a>

