



Scott Eustis <scott@healthygulf.org>

Gulf Restoration Network comments on FY 2016 Annual Plan

8 messages

Scott Eustis <scott@healthygulf.org>

Thu, Mar 19, 2015 at 12:17 AM

To: "Chuck Perrodin (CPRA)" <Chuck.Perrodin@la.gov>

Attached are our comments. Please reply upon receipt, if you could.

Yours,

Scott

—

Scott Eustis, M.S.
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Gulf Restoration Network

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**Gulf Restoration Network comments on FY 2016 Annual Plan .pdf**

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Chuck Perrodin (CPRA) <Chuck.Perrodin@la.gov>

Thu, Mar 19, 2015 at 9:54 AM

To: Scott Eustis <scott@healthygulf.org>

This is to verify that we have received you ,rAnnual Plan comments.

Thank you.

**Chuck Perrodin**

CPRA Public Information Director

450 Laurel Street – Suite 1501

Baton Rouge LA 70801

Website: coastal.la.gov

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From: Scott Eustis [mailto:scott@healthygulf.org]
Sent: Thursday, March 19, 2015 12:18 AM
To: Chuck Perrodin (CPRA)
Subject: Gulf Restoration Network comments on FY 2016 Annual Plan

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Scott Eustis <scott@healthygulf.org> Thu, Mar 19, 2015 at 12:05 PM
To: Raleigh Hoke <raleigh@healthygulf.org>, Steve Murchie <steve@healthygulf.org>, Cynthia Sarthou <cyn@healthygulf.org>, Matt Rota <matt@healthygulf.org>

last minute comments

I apologise for the verbosity

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Scott Eustis <scott@healthygulf.org> Thu, Mar 19, 2015 at 12:32 PM
To: Raleigh Hoke <raleigh@healthygulf.org>, Steve Murchie <steve@healthygulf.org>, Cynthia Sarthou <cyn@healthygulf.org>, Matt Rota <matt@healthygulf.org>

Again, apologies for the unedited nature of the comment letter, i wanted to provide specific examples of some the policy jargon that CPEX et al are pushing, and deadlines are deadlines.

I'm still writing a lot of jargon, rather than communicating. This is shorter:

We have been encouraged by the state's holding community conversations about flood risk management. These sessions were a great process for CPRA to hear the difficult discussions Louisiana residents are having with one another and with their local governments across the coast.

However, the parishes and FEMA are carrying a large, unacknowledged burden in protecting coastal residents from hurricanes that CPRA should acknowledge, coordinate, and assist.

CPRA should acknowledge and communicate the great strides that Terrebonne parish has made in their hazard mitigation program. CPRA should acknowledge and communicate the work of Jefferson and Orleans parishes to coordinate in their water management strategy. CPRA could coordinate 'lessons learned' among parishes in their struggles to implement FEMA's CRS--those guidelines and categories were not written for our unique area of the country.

CPRA should work with economic development departments to implement the innovative engineering outlined in LDEQ's BMPs for stormwater management, to ensure a robust, "emerging environmental" or "water management" economy.

[some stuff about how the real estate industry needs to listen up and shape up]

Flood Protection and wetland restoration means jobs for Louisiana residents, inside the levees as well as outside; but only if CPRA leads the way.

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Floodproofing and relocation are urgent coastal needs. CPRA needs to coordinate the multitude of parish and federal efforts at resilience, provide capacity where it is lacking at the parish level, and plan to dedicate funding to “non-structural” floodproofing and relocation.

We have been encouraged by the recent discussion held on the flood-risk communication tool², and CPRA’s coordination with various advocacy groups across the coast. These community sessions were important for starting and continuing discussions with parishes and local residents about the intricacies of securing persons and property against hurricane damage and devastation. This kind of effort should continue and provide an ongoing process for CPRA to hear the difficult discussions Louisiana residents are having with one another and with their local governments across the coast.

But the parishes and FEMA continue to bear the burden of providing planning, and funding for floodproofing residents, and no authority governs coordination among parishes or the difficult problem of relocation of communities. Residents are already leaving the coast, and our coastal cultures are

1 A diverse coalition of individual citizens and local, regional, and national organizations committed to uniting and empowering people to protect and restore the resources of the Gulf of Mexico.

2 <http://cims.coastal.louisiana.gov/floodrisk/>

disintegrating as a result³. As the Coastal Authority, CPRA should materially provide for the parishes where capacity for local planning and floodproofing support are lacking, and provide a clearinghouse for best management practices for common problems in floodplain management. As the Coastal Authority, CPRA has an affirmative role to engage the real estate industry about the ways in which the private sector can sustain both the public interest as well as economic development in a “water management” sector. A significant economic development opportunity will escape the state if CPRA does not step into an authoritative role.

GRN staff have been working to organize a collaborative in the Greater New Orleans area to implement a water management strategy⁴ for the Greater New Orleans area, which is organized by the artificial “watersheds” that have been created by the levee and drainage system. Although pursuing the exact goals of the CPRA and master plan, and using a similar logic of funding infrastructure to avoid hurricane and other flood damage, the SMP and Annual Plan does not mention this strategy, what Orleans and Jefferson Parishes are doing or not doing to implement it, nor what or how other parishes can learn or can teach in order to achieve protection from flooding behind the levee walls. Terrebonne Parish has a vigorous hazard mitigation program that could provide many lessons learned to Parishes.

Members of this collaborative have provided venues for parish employees to discuss the details and difficulties of navigating FEMA’s Community Ratings System (CRS), and how elements of the water strategy written for the Greater New Orleans do not fall neatly into CRS categories that FEMA has written for the majority of United States communities that do not live within a forced drainage system that receives 60 inches of rain a year. We are proud to be part of a collaborative that has provided a venue for informal interaction among parish employees concerned with aspects of permitting, stormwater management, planning, and hazard mitigation; but this role should belong to CPRA.

In 2010, engineering and planning consultants prepared a technical and educational guidance document for LDEQ⁵ that provides preliminary engineering plans and diagrams for residents and commercial facilities to implement best stormwater management practices. The goal of the report was to provide guidance for creating floodproof development in the GNO area post-Katrina. These BMPs are tailored to

handle the volumes and the pollution unique to our developed coastal areas. GRN is involved in environmental permitting (DNR and LDEQ) that CPRA maintains authority over by statute and executive order. In our review of hundreds to thousands of wetlands and floodplain permits since 2010, the instances of these BMPs appearing in permit applications is vanishingly small, despite the enormous benefits to flood protection they could provide. It occurs to us that stormwater, pollution, and wetlands permits are an inconvenient venue for developers to have to consider appropriate engineering

3 Community Resettlement Prospects in Southeast Louisiana, Water Resources Law Institute, 2015

4 <http://livingwithwater.com/projects/gnowms/>

5 Stormwater BMP Guidance Tool: A Stormwater Best Management Practices Guide for Orleans and Jefferson Parishes October, 2010 http://www.bayoulandrcd.org/files/Bayou_Land_Guidance_NO_BMP.pdf

alternatives for their proposals, but currently there is no other venue to discuss why industrial developments should be planning to build-in additional floodproofing if they plan on building in coastal Louisiana. Instead, CPRA should be the leader in communicating to industry leaders and economic development departments the risks of not following these best practices.

This 'non-structural' engineering report seems to sit shelved and unread, in the same manner as many wetland restoration reports were until the CPRA began the State Master Planning process.

Waiting for FEMA is not a plan. If CPRA considers any floodproofing, resilience, or relocation activities listed here as outside its authority under Act 8 and like legislation, this should be made explicit. CPRA was created in response to the IPET's concern about a lack of central authority governing hurricane protection, and we feel that there are many gaps in governance and coordination that CPRA could fill.

While we do not know precisely where the storm will strike this year, we know well which areas are vulnerable, and which populations are already migrating away from the coast. Some funding must be dedicated to implementing a non-structural program that allows communities to relocate together and plan together before the storm comes. We were hopeful to see more non-structural implementation than exists in the Annual Plan FY 2016.

We ask that CPRA dedicate funding in Annual Plan FY 2016-2018 to non-structural protection to match the spirit of the SMP, in order to establish coordination between parishes and agencies engaged in floodplain management and planning and provide funding and capacity where parishes are lacking.

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Cynthia Sarthou <cyn@healthygulf.org>
To: Scott Eustis <scott@healthygulf.org>

Thu, Mar 19, 2015 at 12:41 PM

Good work Scott

On Thu, Mar 19, 2015 at 12:05 PM, Scott Eustis <scott@healthygulf.org> wrote:

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Cynthia (Cyn) Sarthou
Executive Director
Gulf Restoration Network
(504) 525-1528 ext 202
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Scott Eustis <scott@healthygulf.org>
To: "Nguyen, May" <mnguye8@tulane.edu>, Barry Kohl <Bkohl40@cs.com>

Thu, Mar 19, 2015 at 1:59 PM

master plan comments, abbreviated

also, some scratch notes on the city park debacle --not a comment, just some notes

here's a link to my notes from the other week.

Wetland Strategy 2015

<http://goo.gl/i3xeLH>

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2 attachments



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Objections to City Park Golf Course Hole 5 Impacts on Couturie Forest updated.pdf

1806K

Nguyen, May <mnguye8@tulane.edu>
To: Scott Eustis <scott@healthygulf.org>

Mon, Mar 23, 2015 at 12:16 PM

Wow Scott, you're done pretty thorough research on City park issue.

My understanding is that there are several young attorneys working on it pro bono. A member of the group "city park for everyone" reached out to us about representation a couple of weeks ago, but I never heard back.

May

From: Scott Eustis [mailto:scott@healthygulf.org]

Sent: Thursday, March 19, 2015 2:00 PM

To: Nguyen, May; Barry Kohl

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Scott Eustis <scott@healthygulf.org>
To: Brett Long <brett.a.long@gmail.com>

Tue, Mar 24, 2015 at 10:59 AM

Annual plan comments to CPRA

----- Forwarded message -----

From: **Scott Eustis** <scott@healthygulf.org>

Date: Thu, Mar 19, 2015 at 12:17 AM

Subject: Gulf Restoration Network comments on FY 2016 Annual Plan

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3/24/2015

Gulf Restoration Network Mail - Gulf Restoration Network comments on FY 2016 Annual Plan



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