

ASSOCIATION OF LEVEE BOARDS OF LOUISIANA

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“Without Flood Control, Nothing Else Matters.”

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February 23, 2012

Mr. Karim Belhadjali
Coastal Protection and Restoration Authority
P.O. Box 44027
Baton Rouge, LA 70804

Re: Draft 2012 Louisiana’s Comprehensive Master Plan for a Sustainable Coast

Dear Mr. Belhadjali:

The Association of Levee Boards of Louisiana supports the Draft 2012 Louisiana’s Comprehensive Master Plan for a Sustainable Coast. We appreciate the scope and complexity of such a huge task. We believe that your task force has stated the problems well and we appreciate the enormous effort of all of those who have worked on this Draft Plan. However, we ask that the following concerns be addressed before the document is finalized and submitted to legislation.

Our concerns and comments are based on the goals which the Association has been implementing since 1995. Please keep in mind the motto of the Association of Levee Boards of Louisiana. “Without Flood Protection, Nothing Else Matters”. This is a hard fact for all of our coastal communities.

COMPREHENSIVE HURRICANE PROTECTION STRATEGIC PLAN OF THE ASSOCIATION OF LEVEE BOARDS OF LOUISIANA

The Association has been working under these precepts since 1995 with the creation of the Comprehensive Hurricane Protection Committee.

GOAL 1. TO POSITION THE STATE TO MAKE BETTER DECISIONS

OBJECTIVE

- 1. To build on the mutual benefits derived from programs and projects.*
- 2. To maximize benefits from projects that provide hurricane protection, restore wetlands, rehabilitate infrastructure, do not adversely impact navigation routes, and protect hurricane evacuation projects.*

3. *To eliminate and avoid conflicts among existing or proposed hurricane protection, wetlands restoration, infrastructure rehabilitation, navigation, and hurricane evacuation projects.*
4. *To approach hurricane protection from a state perspective while working within the context of a watershed, such as the Barataria system or the Calcasieu River watershed.*

GOAL 2. TO EDUCATE THE PUBLIC THROUGH OUTREACH

OBJECTIVE

1. *To inform the general public on coordination of hurricane-related projects and coastal restoration projects.*
2. *To advise the individual what he/she must do to protect themselves even if hurricane protection structures are built or upgraded.*

GOAL 3. BETTER MANAGE THE FINANCING OF HURRICANE RELATED PROGRAMS OR PROJECTS

OBJECTIVE

1. *To coordinate federal, state, and local financing of hurricane projects and coastal restoration projects.*
2. *To combine or match hurricane project funds with other sources of financing, such as storm water management, evacuation routes, or flood damage reduction, thereby distributing the costs of projects equitably among several participants while achieving multiple objectives.*

GOAL 4 -TO MAKE A HURRICANE RESISTANT COAST

OBJECTIVE

1. *To foster activities in the coastal zone that are compatible with both the risks to human life and property and the risks to the natural functions posed by these human activities.*
2. *To sustain the resource base and economic vitality of the coastal zone by encouraging mitigation practices that reduce flood damages.*
3. *To address the issues of repetitive losses, nonstructural alternatives, and structural projects within the coastal zone.*

It is from these goals and our work experience that we base the following broad recommendations:

1. In all basins develop a land bridge concept that assists flood protection during storm threats, but allow unimpeded water exchange during all other times. Target the salinity levels based on these cross basin barriers.
Major ridges must be maintained. As an example, the loss of the Bayou Lafourche Ridge separating the Barataria Bay System and the Timbalier Terrebonne Bay Areas will create a large super coastal bay system making storm flooding grow and accelerating wetlands erosion.
2. Prioritize wetland projects which are in a protective relationship with community infrastructure for synergistic effects.

3. Prioritize maintenance of broken marsh, lake and bay edges over filling holes and open water.
4. Develop a procedure that allows in-basin dredging where cost effective, and is environmentally sound. This procedure could also be used to help maintain larger projects which have been created by the introduction of materials from external sources.
5. Seriously consider the comments and concerns of the parish Coastal Zone Management committees, Levee Districts and non-profits, whose board members live in coastal communities.

Under the same guiding principles and goals, the Association highly recommends that the following specific concerns be addressed in the final plan.

- A) We support all of the structural protection projects currently in the draft plan. Further, while we support coastal restoration efforts, it is imperative that these structural projects not be removed from the plan.
- B) We feel that the plan must be revised to include the following structural protection projects.
 - i. The flood protection that was supposed to be included for the Donaldsonville to the Gulf project.
 - ii. Morganza to the Gulf; Houma to Gibson
 - iii. Gibson to Morgan City (including the Bayou Chene structure)
- C) Whenever possible, funds to execute elements of this plan should be sent to Levee Districts and Parishes to implement the projects to take advantage of local knowledge and construction expertise, as well as expropriation authority so that projects across the coast can be built more quickly and at lower cost.

We believe the Plan has captured most of the available technical knowledge, but has not fully utilized the available practical knowledge. We hope that our recommendations help address that weakness and we thank you for the opportunity to comment.



Windell A. Curole, Chairman
Comprehensive Hurricane Protection
Committee for the
Association of Levee Boards of Louisiana