



ST. TAMMANY LEVEE, DRAINAGE AND CONSERVATION DISTRICT

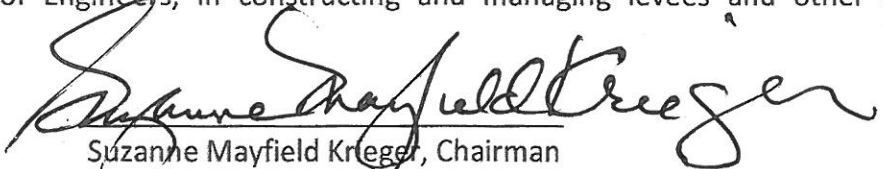
FEMA's Risk Rating 2.0, Declaration St. Tammany Levee, Drainage and Conservation District April 2023

FEMA's Risk Rating 2.0's methodology and lack of transparency harms the St. Tammany Levee, Drainage and Conservation District's ability to carry out its statutory charge to build and maintain levees to defend St. Tammany Parish

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1. The St. Tammany Levee, Drainage and Conservation District has the following concerns associated with FEMA's Risk Rating 2.0.
2. The area within the St. Tammany Levee, Drainage and Conservation District is prone to flooding due to miles of Lake Pontchartrain shoreline, with direct access to the Gulf of Mexico, in addition to miles of rivers, bayous and drainage canals, and acres of low elevation plains.
3. Recognizing the extreme flood risk within the jurisdiction of the St. Tammany Levee, Drainage and Conservation District, it has formed a partnership with St. Tammany Parish Government, the Louisiana Coastal Protection and Restoration Authority (CPRA) and the U. S. Army Corps of Engineers (USACE) to develop a comprehensive flood mitigation plan to provide necessary flood protection.
4. Funding for a proposed \$4.2 billion USACE flood risk plan requires a 35% government match. In addition, a proposed local, parish and state flood protection plan has been approved to address communities left out of the USACE's project. However, the proposed flood protection plans require hundreds of millions in funding to build and maintain the system.
5. To address this flood risk, the St. Tammany Levee, Drainage and Conservation District authority will require approval of an annual levee district tax for the purpose of constructing and maintaining levees, elevating and flood proofing structures, and improve drainage systems needed to protect against flooding.
6. A major justification for imposing necessary flood protection taxes (needed to build and maintain flood protection projects) is the incentive that flood protection taxes (like that from a levee district) would be offset by a decrease in flood insurance cost. However, with the current structure of insurance rates through FEMA's Risk Rating 2.0, flood mitigation discounts do not adequately recognize the value of the flood mitigation and flood protection projects proposed for St. Tammany Parish.

7. USACE and CPRA rely on levees and elevating structures for flood protection.
8. Under FEMA's Risk Rating 2.0, elevating a structure above the BFE appears to have a negligible effect on the insurance rate charged.
9. FEMA's Risk Rating 2.0 has increased the cost of flood insurance for areas protected by levees and elevated properties alike, which may eliminate the incentive to invest in future flood protection projects.
10. Many of the people living in the St. Tammany Levee, Drainage and Conservation District are in a flood plain and are therefore required to purchase flood insurance. FEMA's Risk Rating 2.0 either has already increased the flood insurance rates for those people and businesses or will increase their rates when their NFIP policies renew.
11. As rates increase, people and businesses in the St. Tammany Levee, Drainage and Conservation District are likely to be priced out of their properties and forced to move to out of Saint Tammany Parish, which may decrease the district's financial ability to fulfill its statutory charge to provide flood protection. This exodus may negatively affect the property values and reduction in property taxes, further decreasing St. Tammany Parish's ability to afford the construction and maintenance of flood protection projects.
12. Even if no one were to leave St. Tammany Parish, FEMA's Risk Rating 2.0 increased cost of flood insurance, is still likely to negatively affect property values and reduction in property taxes by thereby decreasing the St. Tammany Levee, Drainage and Conservation District's ability to fulfill its duty to construct and maintain levees that protect its residents and their property.
13. FEMA's Risk Rating 2.0 does not fully account for the protection afforded by levees and elevating structures or for their associated reduction in recovery costs. By not recognizing the full value of levees and elevating structures, FEMA's Risk Rating 2.0 will likely decrease the St. Tammany Levee, Drainage and Conservation District's ability to generate tax revenues to build and maintain flood protection projects and inhibit the district from carrying out its statutory charge to build and maintain levees that defend the communities the district must protect.
14. FEMA's Risk Rating 2.0's reluctance to reduce rates in proportion to the cost benefit ratio of proven mitigation measures of levees and elevating structures significantly limits the St. Tammany Levee, Drainage and Conservation District's financial ability to fulfill its statutory charge to provide flood protection.
15. FEMA's Risk Rating 2.0's changes to the mitigation discount methodology does not encourage proactive flood protection (as promoted by FEMA), instead it puts more people, structures, and community infrastructure at risk, increasing FEMA's financial liability.
16. The St. Tammany Levee, Drainage and Conservation District believes that Risk Rating 2.0's mitigation methodology will harm its ability to partner with FEMA and other federal agencies, like the Army Corps of Engineers, in constructing and managing levees and other flood mitigation projects.


Suzanne Mayfield Kreeger, Chairman
St. Tammany Levee, Drainage and Conservation District