

Gulf Islands Conservancy, Inc
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United for a Healthy Gulf

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- **The Expansion of the cargo Port of Gulfport is not necessary because:**
 - Estimated growth in the cargo container market is unlikely to occur at the rates predicted due to increased transportation costs and other economic conditions.
 - Gulfport lacks the high-capacity, high-volume railway lines needed to efficiently ship large amounts of goods into interior states and the nearby population alone is not large enough to economically support an expanded cargo port.
- **Negative impacts to the human and natural environment from the cargo port expansion and related channel deepening will be significant and permanent.**
 - The dredging of a new, big ditch for navigation through 400 acres of ocean bottom in the Mississippi Sound could have significant negative impacts on sedimentation, channel shoaling, beach erosion, coastal wildlife like shrimp and oysters along with endangered species like the Gulf Sturgeon, the health of water in the Sound, and the families who rely on the Sound for their livelihoods and recreation.
 - This project could pollute the air, contribute to sea level rise and global warming, and significantly increase road and train traffic in surrounding communities.
 - Minority and low-income communities in and around Gulfport that have already borne the brunt of development, pollution, and poverty should not be asked to once again sacrifice their health and security.
- **There are several alternatives to consider instead of this unnecessary and destructive proposal, including but not limited to:**
 - **Alternative 1 – Port Restoration and Hurricane Protection Alternative:**

The Port Restoration and Hurricane Protection Alternative would only include repairs to the existing port infrastructure including hurricane protection measures for the Port of Gulfport. There would be no expansion of the pier/wharf, no dredging for expanded navigation channels, no dredging for expanded berths, and no dredging for expanded basins, and no need for the construction of new revetments, jetty structures, bulkheads,

breakwaters, and piers.

- **Alternative 2 – Repair Commercial Small Craft Channel and Harbor:**
The EIS should consider repairing the Commercial Small Craft Channel and Harbor located on the west side of the proposed project.
- **Alternative 3- No Expansion of the Navigation Channel:**
The USACE states that “deepening and widening the Gulfport Harbor Federal Navigation Channel is not required to support the project as proposed at this time...” Therefore, there is no justifiable need to dredge the Mississippi Sound.
- **Alternative 4- No North Harbor Cut :**
The USACE states that “deepening and widening the Gulfport Harbor Federal Navigation Channel is not required to support the project as proposed at this time...” Therefore, there is no justifiable need to dredge the Mississippi Sound.
- **Alternative 5- No East Pier:**
Alternative 5 would exclude the new revetment that would cross the Yacht Basin Channel on the east side of the Port.
- **Alternative 6- Shipping Storage Area Relocated to Uplands:**
The storage container area will be impacting 63 acres of wetlands in the Coastal Zone. The Port should find a property further north to avoid and minimize permanent damage to wetlands.
- **Alternative 7- Administrative Buildings are LEED-Certified:**
Construction of any new buildings should be LEED-certified as well as any new, modern maintenance and ancillary buildings.
- **Alternative 8- Port Leases Include Environmental Controls:**
According to MSPA, all the piers are public, though most facilities are operated through leases, operating or space assignment agreements with private operators or users. Leases and space assignment agreements should include environmental controls.

We expect that all Environmental controls by state, local, and federal regulatory agencies will be implemented. All alternatives to include recently approved projects to continue:

- 84-acre Permitted Fill project
- 25 feet Port Elevation Project

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!!!! IMPORTANT NOTICE !!!!

Enclosed is a new policy form for your Mississippi Windstorm Underwriting Association policy. While this policy form looks very different, your coverage is essentially the same. **Please review this policy carefully as it is the only basis upon which Mississippi Windstorm Underwriting Association will base its coverage decisions.**

We have highlighted some points of this policy below, but reading your policy is the only way to learn the terms of your coverage.

- **This is a windstorm and hail only policy.** It does not provide coverage for losses caused by any other peril, such as flood, fire, or theft.
- A covered loss to your insured structure can be made at replacement cost so long as at the time of the loss the limits of insurance you carry on the structure is 80% or greater of the total value of your structure.
- A covered loss to your insured contents is available only on an actual cash value basis.
- A covered loss to an additional structure at the insured location can be recovered. Any recovery for damage to an additional structure is limited to 10% of the limits in insurance available for the insured structure. Any recovery for damage to an additional structure reduces the amount of insurance available to be paid for covered damage to your insured structure.
- Certain living expenses incurred as result of a covered loss can be recovered. Any recovery for additional living expenses as a result of a covered loss is limited to 10% of the limits in insurance available for the insured structure. Any recovery for living expenses reduces the amount of insurance available to be paid for covered damage to your insured structure.
- Certain living expenses incurred as a result of a mandatory evacuation issued by civil authority, such as transportation, food, or lodging incurred to comply with the mandatory evacuation, can be recovered. In order to receive additional living expense as a result of a mandatory evacuation, you must present receipts for the paid expenses. Coverage for such mandatory evacuation living expenses is limited to \$1,500.00. Any recovery for living expenses reduces the amount of insurance available to be paid for covered damage to your insured structure.
- There is no coverage available for lost income. This includes a loss of rent as well as any other business operation.
- Among other things, this policy does not provide coverage for trees, shrubs, plants, lawns, fences, walls, or any vehicle.
- This policy has a fully earned premium. When this policy is canceled, no premium will be returned to you or the mortgagee unless it was canceled for one of the following reasons:
 1. Total loss of property
 2. Property is sold
 3. Coverage is moved to an insurance company
 4. Business has ceased operations

Sierra Club

Gulfport Harbor Expansion EIS scoping meeting

Submitted by: Steve Shepard, Gulf Coast Group Chair
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Comments: The Gulf Coast Group of the MS Chapter of the Sierra Club objects to every aspect of this harbor expansion project on environmental grounds. We request that all environmental concerns are addressed within this planned document, not just harbor expansion and channel dredging—as are all aspects of economic/cost-benefit analysis.

The Gulfport harbor expansion proposes to dredge the ship channel and dispose of spoil increasing the already destructive channels size and potential for erosion and magnifying storm surge damage during hurricanes. The Army Corps recently closed the Miss. Gulf Outlet Canal after decades of destructive erosion and magnified damage to communities near the canal. In addition any expansion of the channel only magnifies the saltwater intrusion problem, elimination of freshwater wells, damage to the estuary's biotic communities. What about the Gulfport ship channel is different and less potentially destructive than the Miss. Gulf Outlet Canal? It should be kept to its current size and depth if not made smaller.

The proposal to build a 25 foot tall island using soil barged in from who-knows-where is also a bad idea with a magnified potential for hypoxia in near shore waters, a cutting off of currents and wave actions on a daily basis, a reduction of sea life and potential for sea grass beds and other healthy water bottoms. The existing man-made island has stifled the proliferation of natural biotic communities. There is no need to make this situation worse by adding onto the existing harbor and piling the soils into an even higher and wider obstruction to a healthy marine ecology in the area.

The industrializing of the seashore at hwy 49, usually the entry point for tourists and the source of ½ of the current harbor's economic gain from the Island View Casino, will be severely disrupted and should discourage this plan's implementation or the Army Corp's agreement to approve it since the loss of revenue could easily outstrip any slight gains from the enlarged terminals for off-loading produce/merchandise.

Tourism has become, since legalized gaming, a resource of singular importance and this harbor's expansion with nothing but ship offloading—something carried out in Pascagoula, New Orleans, Mobile, Pensacola—precludes and prevents the healthy maintenance and expansion of tourism on this coast.

The industrializing of this area is not justified by the premise that this port will successfully gain enough new business to offset the economic declines caused by its unattractive and unhealthy environment making tourism unlikely and causing coastal transit far more difficult for tourists.

The road-building and railroad expansions so that hundreds of trucks and numerous locomotives can drive through from interstates and rail spurs to the port offer not only a tremendous impediment to visitation and tourism, but pour unacceptable pollutants from diesel engines and bunker fuel on ships into the community and into the lungs of visitors coming for clear skies and pristine vistas where ever

possible.

This project is bigger than the harbor dredging and island building; the problems are manifest from the top of the City of Gulfport to the end of the channel outside Ship and Cat Islands. The EIS must include all aspects of the change being wrought on this area—not just dredging and filling, but road-building, rail expansion, the inland port location, the racial justice implications of MDOT routes, whether or not the roads and rail are elevated, the air pollution from ships in port or automobiles OR from the coal-fired power plant located nearby which supplies electricity to ships tied at the dock.

Every aspect of this proposal should be included in the EIS and without that no reasonable EIS can be developed.

As for the air pollution magnified through so many diesel trucks, so many diesel locomotives, so many ships burning bunker fuel: The requirement for allowing this expansion to take place—should this project go forward—should emphatically and absolutely require only the properly maintained diesel trucks and diesel locomotives with only the latest and best pollution control devices installed and using only diesel fuel refined so that sulfur and other pollutants are minimized when burned.

Ships approaching the Gulfport ship channel should switch to cleaner fuels fifty miles from port—as required in the Los Angeles port to help lower the amount of pollution released in this community.

The roads should not be elevated and the inland port should be placed above I-10 so that survival in serious hurricanes can more realistically happen.

Approaches to this port from the north by rail and road ought to take into account the economic status of communities with the roads avoiding economically challenged communities as often as these corridors will avoid wealthy neighborhoods. There should not be another opportunity to blight the historic Turkey Creek Community without making sure that the same corridor affects the homes of former mayors, millionaire businesspeople, and others normally immune from expansions of noise and pollution.

In closing, We at the Sierra Club would argue that the environmental price to pay for this expansion is too great, that if the economic gain is weighed against the potential economic loss, and the overall cost is compared to the handful of jobs guaranteed, whether from an environmental or economic viewpoint, the best alternative in this case is to do nothing—no expansion of harbors channels or roadways-- and leave bad enough alone to do no more harm than is already endured by a city struggling to recover from its last and worst hurricane.

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