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HISTORIC TAX CREDIT TOOL BOX 🌿

Safeguarding Sandpiper Cove: How a New Floodwall Seeks to Protect a Historic Affordable Housing Complex

CINDY HAMILTON, HERITAGE CONSULTING GROUP

In early September 2008, a tropical storm began churning westward from Puerto Rico, gathering strength as it hurtled toward the island of Galveston, Texas. By the afternoon of Sept. 3, “Ike” had become a major hurricane, increasing in intensity as it plowed through the Gulf of Mexico with winds up to 145 mph.

With each passing day, the storm’s path traced the track of a hurricane that had struck Galveston a century earlier, Sept. 8, 1900; that hurricane killed more than 8,000 people, making it (according to the National Weather Service) the deadliest natural disaster in the history of the United States. Hurricane Ike’s trajectory bore all the indicators of a similar disaster for Galveston, and at 2:10 a.m. Saturday, Sept. 13, it made landfall.

History of Sandpiper Cove

On the north side of Galveston, residents of the Sandpiper Cove complex attempted to evacuate or hunkered down in their apartments. The complex of 23 two-story residential buildings (historically known as the Parkland Apartments) was built between 1968 and 1970 by a local developer, the Galveston Central Area Inc., in partnership with the Eliza and Harris Kempner Fund. Although the developers used funding from the U.S. Department of Housing and Urban Development’s

Image: Courtesy of Heritage Consulting Group
Sandpiper Cove was the first privately developed affordable housing development in Galveston, Texas. It’s shown here with a view of its floodwall.

Section 221(d)(3) mortgage program and the Federal Housing Administration's rent supplement program, the complex nevertheless represented a shift toward privatization in the federal government's public housing strategy in the late 1960s and early 1970s. The Sandpiper Cove site was the first privately developed affordable housing project in Galveston.

Designed by architect Herbert Hudler Jr., the low-rise residential buildings are on Winnie Street, three blocks north of Texas Highway 87, the main east-west arterial road on Galveston Island. The buff-brick buildings were designed to be relatively simple on the exterior, with minimal ornamentation, as was typical in the middle of the 20th century. On the interior, the units housed low- and moderate-income families, with preference given to handicapped individuals, single people 62 and older, and families displaced by government actions (e.g., large-scale renewal projects). Altogether, the apartment buildings (and their shared community building) occupied a 7-acre site notable for its open character and its proximity to the Port of Galveston just a half-mile north.



Image: Courtesy of Heritage Consulting Group
The National Park Service acknowledged the flooding risk present for Sandpiper Cove and determined that a proposed 2,800 linear-foot wall would meet the Secretary of the Interior's Standards for Rehabilitation.

A Vulnerable Landscape

As Hurricane Ike bore down on the island, those characteristics of the Sandpiper Cove site left the complex extremely vulnerable. With no buffer from the storm's gusts (up to 110 mph by the time Ike reached Galveston) and the port's flooding, Sandpiper Cove faced hours of wind damage and days of cascading floods. The roofs were ripped off some buildings, exposing the second-

floor apartments to the elements, and the water levels rose several feet within the first-floor units. By the time the hurricane dissipated Sept. 15, Sandpiper Cove had seen at least one fatality from the storm and sustained a portion of the overall storm damages of \$38 billion.

In the immediate aftermath of the hurricane, Sandpiper Cove's owners redressed the most urgent condition issues. In the years that followed, however, it became evident that the complex needed more substantial rehabilitation. In 2021, the ITEX Group acquired the property through an affiliated entity and began to pursue historic rehabilitation tax credits (HTCs) for the undertaking. The complex was successfully nominated to the National Register of Historic Places based on its significance as the first and only known example in Galveston of private affordable housing supported by FHA Section 221(d)(3). With that designation in hand, the developers submitted their proposed scope of rehabilitation work for state and federal review.

Scoping the Solutions

In many ways, the scope was typical for an HTC-supported rehabilitation. It would include limited masonry restoration, window reglazing where necessary, updates to the floor plans to meet current ADA requirements and improvements to the mechanical/engineering/plumbing and HVAC systems to upgrade the aging buildings. The major challenge for this undertaking, however, stemmed from the impacts of Hurricane Ike 14 years earlier, and the city's evolving Flood Damage Prevention Ordinance that seeks to prevent any comparable disasters.

As Hurricane Ike made clear, the Sandpiper Cove buildings are located at-grade and within the flood plain; in their pre-rehabilitation form, they did not meet the ordinance's current requirements. Most new construction in the area complies with the ordinance by placing all structures on raised pedestals or stilts and the ITEX Group explored raising the Sandpiper Cove buildings

to comparable elevations. This option proved infeasible, though: apart from the significant financial costs of that approach, the project team expressed concern that the buildings' structural integrity would be compromised by such an effort.

Instead, the ITEX Group, its lender and equity partners determined that a new floodwall around the site represented the best alternative; it was not only more cost-efficient, but also the less-invasive option to mitigate against future flood events as climate change accelerates.

A New Floodwall to Protect Old Buildings

But a new floodwall was a tough sell for this HTC-supported project. For a site that had always been open, a new perimeter barrier marked a significant alteration to the historic character of the National Register-designated site. The initial HTC application required amendments, as the design and engineering team refined the scheme in collaboration with reviewers.

HTC reviewers from the National Park Service (NPS) acknowledge that flooding risk presents an increasing challenge for many historic properties throughout the country. In 2021, the agency published the Guidelines on Flood Adaptation for Rehabilitating Historic Buildings in response to these hazards. With respect to the circumstances at Sandpiper Cove, NPS's Technical Preservation Services (TPS) staff who administer the HTC program, recognized the scale of the issue—and the potential threat of doing nothing.

“The [Sandpiper Cove] project is a large, multiple-building complex consisting of over 20 buildings that all required substantial flood protection,” a NPS TPS representative said. “Given the number of buildings and slab-on-grade construction, [the] developer in this case proposed constructing a flood wall to protect the entire property, and it was determined to be an appropriate strategy that avoided having to alter each building.” The

NPS determined that the proposed wall would meet the Secretary of the Interior's Standards for Rehabilitation.

Flood Protection Above and Below Ground

Measuring 2,800 linear feet, the wall was no small part of the overall rehabilitation. It encloses the entire property, with the sole exceptions of the drive gates, walk gates and the clubhouse. In these locations, moveable gates can be closed and reinforced with aluminum flood logs during major storms.

The final floodwall design is deliberately simple in profile, like the exteriors of the buildings that the structure protects. To ensure further compatibility between the old and the new, the development team sought to color-match the wall with the existing exteriors—a design decision that proved more challenging than anticipated. Eventually, though, they were able to create a veneer that mimicked the buff color of the apartment buildings, ensuring that the new addition complemented the historic buildings.

The less-visible parts of the floodwall were equally complex, and critical to the barrier's effectiveness. The wall itself stands 8 feet above grade and rests on concrete strip footing, but below the surface, sheet piles alternating between 25 feet and 12.5 feet burrow underground to mitigate the seepage of floodwater through the island's permeable soils and erodible sands. The presence of the sheet piles required the relocation of existing underground utility lines, but in the course of that construction, the developers were able to install supplemental pumps and a drainage system to remove surface water runoff and floodwater seepage.

A Model for Mitigation

Although Sandpiper Cove's floodwall required site-specific engineering and design, the process that arrived at those solutions can be a model for other historic properties that might be eligible for HTCs but

face significant flood risks. First, the NPS recommends that developers thoroughly document the flood risk. They should then assess alternative design strategies; a floodwall may prove to be the best option, for the same reasons it was the selected approach for Sandpiper Cove, but other strategies may be more appropriate. Next, the developer and design team should ensure that the mitigation scheme meets the Standards for Rehabilitation; the supplemental Guidelines on Flood Adaptation for Rehabilitating Historic Buildings can be a useful resource. Most importantly, the NPS recommends that the development team work closely with the appropriate state historic preservation office (SHPO) to request a preliminary consultation with the NPS early in the planning. “Adaptation treatments should

increase the building’s resilience to flooding risks,” a NPS TPS representative said, “while preserving as much as possible significant historic materials, features or spaces.”

Conclusion: Made to Last

The construction of Sandpiper Cove’s floodwall amounted to \$3.8 million of the complex’s overall \$54.6 million rehabilitation. But for the ITEX Group and the residents of the site’s 192 apartments, there is no price tag on the lives and livelihoods that may be saved by this new barrier. Although extreme weather events are increasingly likely in the face of climate change, Sandpiper Cove’s new floodwall aims to secure a better future for this significant site, so that history does not repeat itself. ❖

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