



LOUISIANA WILDLIFE FEDERATION

The voice of Louisiana's wildlife and natural resources since 1940.

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March 17, 2023

Coastal Protection & Restoration Authority
150 Terrace Avenue
Baton Rouge LA 70802
via: masterplan@la.gov

RE: Draft 2023 Louisiana's Master Plan for a Sustainable Coast (Coastal Master Plan)

Dear CPRA,

Louisiana Wildlife Federation (LWF) has long championed the continued refinement and improvements to the state's coastal efforts through the Coastal Master Plan. LWF commends CPRA for their commitment to making every iteration of this plan more thorough and effective by building on successes of past plans and using stakeholder engagement to improve future processes, transparency, and community outreach.

The following comments are offered in the spirit of expanding those efforts to increase stakeholder understanding and engagement with the 2023 Coastal Master Plan.

Outreach and Engagement: Community Conversations and Public Hearings

Outreach and engagement efforts have greatly improved over the years, and this has been no exception for the draft 2023 Coastal Master Plan. LWF applauds CPRA's efforts to engage with community partners through the Community Conversation meetings held in nine communities across the coast. Having these more informal meetings that offer conversational engagement with residents in their local communities is a critical part of the outreach and engagement process and we strongly encourage CPRA to continue these dialogues in the future. A way to increase the impact of such dialogues would be to offer these opportunities earlier in the drafting process – rather than at the end of that process – to provide residents adequate time to familiarize themselves with the process prior the official draft release.

LWF was pleased to see maps with improved readability – both in the plan itself and printed and displayed during public meetings. The ariel view maps of each region were an especially helpful addition to visualize proposed projects on the landscape for each region of the coast. The decision to address issues on a more regional level is an improvement and we are glad to see that CPRA took this feedback from the 2017 Coastal Master Plan to improve the planning process by incorporating regional workgroups to help develop and refine project ideas.

Including the Master Plan Data Viewer at public hearings was a great addition. It would be worth speaking a little more on this at the end of the presentation for any attendees that might not have had the time to arrive earlier in the afternoon during the open house. There was a focus on the data viewer during the Community Conversations but not as much at the public hearings.

The presentations given during the public hearings were very informative. LWF would like to offer a few suggestions to make this information more digestible for a general audience. CPRA should be mindful of using jargon such as “1% Annual Exceedance Probability”; explaining that CPRA looked at storms with a 1% chance of happening in any given year (and stressing the fact that such storms can occur more often than once every 100 years) would be more easily understandable. It would also be helpful to provide examples of storms that fall under such a category. Real world examples help visualize the concept and should therefore be given both during public hearings and in the master plan document itself.

The master plan presentation includes a slide on risk reduced at year 50 compared to a future without action. It would be helpful to give more context as to what those metrics are. People that are not familiar with the plan may not remember what expected annual damage in dollars (EADD) and expected annual structural damage (EASD) means. While the information given in presentations is valuable, it can be a lot to digest at one time for someone not familiar with the process. When explaining the reductions in figures associated with each metric, it would help to state, as is stated in the plan, that EADD is “an annualized estimate of storm surge damage. EADD includes damage to structures, their contents, and other direct losses incurred during the recovery period after a storm event, such as lost wages, [and] costs associated with evacuation and temporary displacement...EASD is reported in ‘structure equivalents’ and represents an aggregate risk to structures, with damage to each structure expressed as a proportion of its replacement cost”. It would be worth reiterating that EASD is a new metric added to this master plan and explain how it makes project selection a more equitable process.

Having a virtual meeting option is important and we encourage CPRA to always include this as part of its outreach efforts. A standalone virtual meeting, conducted strictly for an online audience, should give an overview of the entire plan as well as some specifics on each region. This could be a slightly longer meeting than typical 30-minute max in-person presentations in order to serve as a useful resource during the open comment period. In-person meetings could take a deeper dive into the benefits to the areas in which the meeting is held; these meetings could also be live-streamed. While live-streaming in-person meetings can be helpful for those unable to attend in their region on the meeting date, these should be offered in addition to (not in the place of) an online-only version of the presentation.

The Houma meeting is the only version of the master plan presentation available online. There is a lag in viewing the land change maps at different decades compared to the audio. This could perhaps be fixed by the presenter taking a few more seconds between maps before proceeding to the next decade in order for the viewer to adequately follow along. This also highlights the importance of having a meeting for an online-only audience.

Since this master plan process has included regional workgroups, it would make sense to have a public hearing for each region. CPRA does a good job of covering most of the coast, however, the following proposed locations would include Abbeville and a location in the River Parishes:

- Chenier Plain: Lake Charles
- Central Coast: Abbeville and Morgan City (the Morgan City hearing could combine an overview of the Master Plan with the Atchafalaya Basin Annual Plan hearing)

- Terrebonne Basin: Houma
- Barataria and Pontchartrain/Breton Basins: River Parishes and New Orleans

When meetings start at 5:30 pm, it is difficult for residents to travel over an hour and make it in time. If someone were to work until 5pm, for instance, they would miss the meeting entirely as presentations rarely last more than 30 minutes. This is why we would suggest adding Abbeville in addition to Lake Charles for public hearings and having a meeting in the River Parishes rather than (or in addition to) Baton Rouge, as Baton Rouge is notorious for poor traffic flow during this time and could make it equally difficult to get to for those that live or work in the River Parishes to make it to a meeting on time.

It is also important to consider the fact that not everyone has reliable broadband internet access. There needs to be more efforts in the future to communicate with communities in addition to digital communications via social media and email. Other methods to reach out to communities could be more direct by posting flyers about upcoming meetings (Community Conversations, calls for project ideas, official public hearings, etc.) in parish government offices, community centers, recreation centers, etc. CPRA could collaborate with local officials to determine other ways to expand communication efforts to ensure residents have the opportunity to engage.

Additional ways to increase accessibility include offering materials in multiple languages. This has been done before and would be helpful to offer for both the draft and final versions of the plan in order for non-English-speaking stakeholders to engage more fully in the process. Also, the 2017 Coastal Master Plan was made available in public libraries. LWF strongly encourages this for the 2023 plan and to make this a standard practice for all future iterations as well. In the printed version of the plan, there could be some improvements to the maps that are laid out over two pages. The portion of the map that falls in the spine of the book cannot be seen without damaging the binding. It might be helpful for final versions to include a wider page that is folded and can be opened to see the entire map rather than the map printed on two adjacent pages. This way, if schools or public libraries have printed copies (or anyone else for that matter), they can see that section of the coast and what is depicted on the maps. Another alternative would be to have printed versions spiral bound like the FY24 Annual Plan or rotate the maps so that they are in landscape view along the shorter edge of the paper.

Once a final version of the master plan is released, there should be a way to request a hard copy, and this should be clearly stated in the final plan as well as on the master plan website. Draft versions of the plan are made available in print during public hearings. Often, this is the only version people have even after edits are made for a final plan, leaving them with an outdated hard copy. Offering the opportunity to request a final copy could help ensure that stakeholders who regularly reference the document can have a current version on hand.

Master Plan Website

On the main master plan page, there is a Technical Appendices link. For the layperson, however, this may seem like something to pass over, as one might assume that it may only contain information that gets “in the weeds”, such as specifics on model improvements. It would be

helpful to call out a little detail on what resources are offered under the Technical Appendices as there is a lot of valuable information that is not overly technical. For instance, the project, parish, and regional fact sheets are located here; it would be helpful for those links to be in a more prominent location (or added to the main master plan webpage as well); at the very least, it should be called out that the Technical Appendices link is where to find that information. Perhaps a section entitled “Additional Resources” could offer a bulleted list of links appendices, fact sheets, and other more useful supplemental materials for the general public to reference.

The fact sheets are not only difficult to locate if you do not know where to look but are also very cumbersome to navigate once the file is opened. The Project Fact Sheets (Attachment F2) document is 94 pages while the Parish Fact Sheets (Attachment F3) document spans 43 pages. While the parish and regional sheets include a table of contents with corresponding page numbers, this is missing from the Project Fact Sheets document. Also, while it makes sense to have these each as single attachments to include for purposes of the plan as a whole, this is not a user-friendly format as a general reference for stakeholders. It would be much more helpful to include these fact sheets as standalone files that can be downloaded or printed.

The draft plan included FAQs at the end of each section, which were a great addition. It would also be helpful for the questions to be compiled into a single FAQ document to be added to the master plan website. This could also be located under an “Additional Resources” section.

The Master Plan Data Viewer is an incredibly useful tool and LWF is pleased to see continued improvements and additions to this resource. We suggest that CPRA double-check the search feature to make sure it is working properly; last we checked, it was not responsive to search inquiries. It would also be helpful under the Projects tab of the viewer to organize the list by each of the categories. The list is organized alphabetically by project name, however, it would be useful to also reorder the list according to project type or parish, for instance.

Regarding the interactive project map, there is an issue with using this map on a mobile device. When zooming into the map to try to select a project, the icons do not auto-adjust in size as they do on the desktop version. This makes it difficult to select certain projects since the icons are stacked one atop another in the zoomed out view. Similarly, the text stays zoomed in a very large font when you zoom in and click on a project. Also, if someone rotates their phone to view the map in a landscape mode, they are unable to view the map of projects as it does not auto-adjust. We advise someone to review the mobile accessibility of this interactive map to fix these issues; this seems to be an issue for android users but not iPhone users.

Visuals in the draft 2023 Coastal Master Plan

The project type icons and maps have significantly improved, and we commend this attention to detail to make the plan easier to read. Additionally, the explanations with the schematic crosscut with project features for each project type are incredibly useful visualizations and we commend CPRA for this improvement as well.

The Timeline of Progress is also a great overview of notable events and milestones achieved since 2005. It would be great if this could be an interactive online resource as well that is continually updated as time goes on and more work is completed, and key achievements realized. Examples of how this could be made interactive include linking a CPRA press release for each milestone/notable event as a way to offer more background and detail. Additionally, the user could hover over or click the numbers listed in the line graphs of “Projects Beginning Construction” and “Projects Completed” to get a brief overview to a list of projects. Another feature could give more detail when hovering/clicking the “Planned Annual Expenditure” totals; this could send the user to a list of expenditures by project, parish, region, and project type. It would also be helpful for these totals to depict “actual” expenditures rather than “planned” since totals for past years are known.

Maps are powerful tools for stakeholders to envision and communicate consequences of various scenarios on specific areas of interest. To help compare and contrast maps of a Future Without Action (FWOA) vs. Future With Action (FWA) as well as comparing sea level rise scenarios, it would be helpful, in addition to the current layout of the maps, to offer pages with an “At-a-Glance” view where the visuals are stacked one above another for the following:

1. Land Change: FWOA, lower vs. higher scenario
2. Land Change: FWA, lower vs. higher scenario
3. Land Change: FWOA, lower scenario vs. FWA, lower scenario
4. Flood Depths: FWOA, lower vs. higher scenario
5. Flood Depths: FWA, lower vs. higher scenario
6. Flood Depths: FWOA, lower scenario vs. FWA, lower scenario

Since the only conditions used throughout the plan for maps and other comparisons are the FWOA and FWA, LWF suggests removing the section that discusses future without currently funding projects (FWOCFP). This causes some confusion with a future without action. Perhaps this would be better suited as a call out box in the FWOA section that states that other model runs considered only projects that have been constructed with a note of the appendix where more information can be found. This section could cause more confusion than understanding.

The benefits over time includes several graphs that show impacts of the plan. The graph depicting land area built or maintained (Figure 5.4) could use a bit more description to clarify the results. One might assume that benefits of implementing the projects in the plan would be more pronounced under the lower scenario; however, the graph indicates this is not the case. More detail explaining these results could reduce confusion.

Projects and Programs

LWF is pleased to see major projects moving to the FWOA condition – particularly the River Reintroduction into Maurepas Swamp and the Mid-Barataria and Mid-Breton Sediment Diversions. LWF eagerly awaits ground-breaking for these restoration projects.

Regarding diversions, there needs to be more details given about diversions being considered programmatically rather than specific proposed projects. The Upper Basin Diversions Program is given some explanation in the plan but could use a bit more detail. For example, are there projects that are completely removed? What about the Union Diversion, which has funds allocated in the annual plan? Explanation on specific projects that have previously been in the plan (like Union and Ama and Central Wetlands) need to be discussed here.

To further explain changes from one plan to another, LWF strongly recommends CPRA offer an online resource that clearly lists: (1) projects in the 2023 Coastal Master Plan that were carried over from the 2017 plan; (2) projects that were removed from the plan with an explanation of why; and (3) projects that are new additions to the plan.

Additional Comments on the draft 2023 Coastal Master Plan

Prior to Chapter 1, there should be an Executive Summary. This should also be a stand-alone document on the master plan website that can be shared broadly to educate residents and other stakeholders that are not familiar with the plan. Summaries are helpful for people that may be new to learning about the plan and for people that may not have time to read the plan in its entirety.

Prior to the summary should be a List of Abbreviations; while many of the appendices include one, this is missing from the main document. The table of contents should be more comprehensive and list section titles in each chapter to more quickly find information.

LWF commends CPRA on improving modeling parameters to include not just the value of individual structures, but the number of structures impacted in a given area as well. The Expected Annual Structural Damage (EASD) metric is a great improvement. In Chapter 2, this metric is explained in a bit more detail. A very important point is made: “It is important to consider the proportional flood damages that are represented by EASD so that the project selection process will not be more heavily weighted toward reducing damages in affluent communities at the expense of communities with lower property values.” This is a point that should be highlighted in the introduction as well as an executive summary as it is a very critical point to note how this plan is made more equitable than past plans.

Included in 2017 Coastal Master Plan was an infographic depicting the economic importance of Louisiana’s coast. The Master Plan Data Viewer in that section was helpful as well to bring that to people’s attention. These should be updated and added to an Executive Summary section in the 2023 Coastal Master Plan as well.

The call out boxes that lists relevant appendices are very helpful. However, since the appendices are not at the end of the master plan document itself but are instead in a different location on the website, it would be even more helpful to note the website URL and include a QR code that links to that section of the 2023 Plan Appendices website (just as is done on each map that links to the main master plan website). Additionally, the 2017 Coastal Master Plan mentioned appendices on

the “Contents” page; this should also be added to the 2023 Coastal Master Plan “Contents” page and include the URL.

It would also be helpful in The Current Outlook section of Chapter 3 (pgs.36-39), to add a similar call out box to Appendix F – particularly the 2023 FWOA Project List (Supplemental Material F1.1). In this part of Chapter 3, future without action is explained in further detail, so it would be helpful to note where to find the list of projects included in the FWOA condition.

The Funding and Implementation section should be separated as standalone sections. It might be more appropriate to include the section on funding in chapter 1 or 2 with other background information. A section on implementation could also give general details on implementation periods. Furthermore, there should be explanation on the implementation years given in the Master Plan Data Viewer as to how these years were determined. It should also provide more information on how CPRA plans to utilize the \$11.2 billion set aside for nonstructural measures. There isn’t much explanation as to how these funds are planned to be spent or what entity will oversee this. Clearly, there are unknowns as far as what exact properties would get money, but there needs to be more description as to the programmatic plans. As the years progress, the impacts of sea level rise compounded with subsidence will make nonstructural protection increasingly important for communities to understand so that they weigh their options to protect themselves from future risks.

Funding coastal restoration and protection projects can be very complex to understand. While CPRA has done a good job of including information on the various funding sources and entities, it would help if the information were laid out in different segments. It might be more easily digestible to break it up into major sources of funding such as oil spill settlement funds (RESTORE, NFWF, NRDA), state and local funds (Coastal Trust Fund, capital outlay), federal sources (CWPPRA, GOMESA, WRDA), as well as other funding priorities and sources (IIJA, Supplemental Disaster Relief), etc. An additional segment to the funding section of the plan should highlight the fact that the master plan currently does not have enough funding identified to implement all projects. It would be worth noting efforts underway to secure funding to fill that gap.

Regarding engagement with the master plan process, it would be helpful to list in the plan additional background information on how advisory and workgroup members are selected and, if applicable, how others can get in contact with CPRA if they are interested in learning more and/or being involved in future advisory roles. It would be helpful for CPRA to also include some guidance on how to suggest a project idea for the next master plan. Some of this can just be referenced toward the end of the document with a link to the website where they can learn more.

The Beyond the Master Plan section is a nice way to conclude the plan to describe additional work being done to address Louisiana’s coastal challenges. Website addresses should be listed for each program that is mentioned in this section. Other additions consider include:

- The Louisiana Hypoxia Working Group and the Gulf of Mexico Hypoxia Action Plan
- The National Estuarine Research Reserve program and the nomination of the Atchafalaya Basin to serve as Louisiana’s first NERR

- The Water Institute of the Gulf
- The LSU Center for River Studies

As was mentioned during the public hearings, what's at stake are Louisiana homes, jobs, and culture. It was stated that "the goal is to have a resilient coast in which people can continue to live and work and take advantage of all the things that make the coast of Louisiana so economically and ecologically and culturally valuable". This planning process has made great improvements to more fully consider human impacts when considering projects. In 2017, CPRA released a document, *People and the Landscape* (Appendix B), that reviewed the plan as it relates to Louisiana's coastal residents. It included discussions on land loss, insurance, population shifts, and flood risk as well as economic opportunities and the importance of our coast to the nation. It would be very helpful for CPRA to continue offering this non-technical summary of master plan themes and findings that can be shared with residents, parish leaders, and other stakeholders. We suggest including additional explanation of adaptation and nonstructural protection in this document in addition to the previously mentioned topics and include more information on the Master Plan Data Viewer. Including visuals like the community cross section with high tide flooding elevations would be a good addition to this document as well. As years progress and funding from the *Deepwater Horizon* settlement wind down, having a resource like this would be valuable to highlight the importance of securing additional funding for coastal restoration and protection projects.

LWF is pleased to see a continued commitment by CPRA to develop a comprehensive plan that takes all the stakeholders into account. We offer these additional suggestions for further clarity and accessibility of information and look forward to seeing this progress continue.

Louisiana Wildlife Federation is a statewide, nonprofit organization that represents 19 affiliate organizations and more than 8,000 members dedicated to the conservation of Louisiana's wildlife and natural resources. Thank you for the opportunity to submit these comments for consideration.

Sincerely,



Stacy Ortego
Coastal Policy Manager