



LOUISIANA WILDLIFE FEDERATION

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

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July 9, 2024

To: driveinitiative@la.gov

Re: Comments on the Presentation to the Natural Resources Steering Commission Meeting of June 18, 2024

To Whom It May Concern:

Louisiana Wildlife Federation (LWF) appreciates the opportunity to comment on presentations made to the Natural Resources Steering Commission (NRSC) regarding the Departmental Review for Innovation and Visionary Enhancement (DRIVE) and reorganization of the Department of Energy and Natural Resources (DENR) at the meeting held June 18, 2024.

Over its eight decades as an organization, LWF has facilitated citizen action and engagement in natural resources management on behalf of our membership that has been comprised of hunters, anglers, paddlers, campers, boaters and birders who appreciate Louisiana's abundance of wildlife and the heritage of outdoor recreation we enjoy. Our membership of more than 11,000 today prioritize coastal sustainability, comprehensive water management, and wildlife conservation as crucial for Louisiana's economic and environmental stability.

LWF believes there is always room for improvement and modernization, and we commend the Governor, the Steering Commission, and the DENR for undertaking this exercise. LWF supports the Commission's goals to increase transparency, efficiency, and coordination, utilize clear and intuitive governance, and ensure sustainability. In particular, we commend the DRIVE initiative for its focus on fostering collaboration and information sharing across agencies. These efforts will improve decision-making and manage the state's natural resources and associated infrastructure in a way that complements the state's overall infrastructure needs.

At this time, our comments are limited to general observations and in response to the stated recommendations presented for the NRSC's consideration. With the addition of specific recommendations the Steering Commission may consider, we look forward to the opportunity to provide further comments.

Water Resources

In the reorganization of DENR provided for by HB 810, LWF supports the creation of the Office of Land & Water that could facilitate a more comprehensive management of the state's water resources. Currently, there is no Division of Water in DENR and management of surface water and groundwater is spread among different agencies and authorities. LWF supports the work that a groundwater authority for each of the aquifers in the state can provide in coordination for conservation management and usage unique to each. But Louisiana is behind in creating a water budget and effectively tracking withdrawals and usage of the water sources of the state. This

makes it difficult to prioritize uses or protect quality and quantity for future use in the state. Clean and potable water is vital for life. Water is also important for economic growth and this state perceives that water is in abundance and will continue to be so without management of use. But overuse, uses leading to poor quality, and threats from reduced flow are real challenges to long-term prosperity. Impact from predicted increases in flood and drought cycles point to coordinated management being prudent and necessary now.

LWF urges this administration to continue looking at the role DENR and other state agencies can play in comprehensive management of water for Louisiana. This can include the creation of a centralized water resources management office, such as a Division of Water in DENR. Other actions could include seeking enhanced data collection and analysis that can inform decision making about not just water agreements and utilization but assist in watershed management. A state water management plan is needed.

Related to this, the administration should continue evaluating how the Louisiana Watershed Initiative can realize the goals of full watershed-based floodplain management using the models being developed for use in planning.

The Water Resources Commission has been playing a useful role in addressing concerns around the sale and removal of water from the state and additional water issues that continue to emerge. This Commission meets regularly and would serve an important role in supporting the DENR recommendations relative to a water master plan because it brings together stakeholders from transportation, manufacturing, agriculture, and municipal users for important feedback, guidance, and advice. They can also become champions for proposed changes.

Renewable Energy

LWF appreciates the recommendations related to renewable energy siting that include “partnering with the Bureau of Ocean and Energy Management and the National Oceanic and Atmospheric Administration and the National Centers for Coastal Ocean Science to pursue programmatic and geospatial planning and stakeholder outreach for offshore wind development in state waters.”

We would agree that “planning and outreach efforts are essential in allowing Louisiana to responsibly and equitably advance offshore wind development and reach the state’s procurement goal of 5 gigawatts of offshore wind by 2035.” Industry can help with education and the state agency responsible for siting projects must be as transparent as possible throughout the process so that citizens know how these decisions are being made.

HB 810 created the Office of Energy with a broad mandate to “organize, plan, supervise, direct, administer, execute, and be responsible for the functions and programs relating to the deployment and operation of alternative energy infrastructure in this state in a manner that results in affordable and reliable energy.” LWF would want to see more specificity of what authorities the Office of Energy will have as compared to the Public Service Commission.

Related to this, creating a Division of Power would be better suited in the new Office of Energy.

The planning and use of renewable energy sources is becoming a part of the mix of energy production in Louisiana and should no longer be described as “alternative” when Louisiana is, for example, already permitting solar and wind projects.

We commend the recommendations to continue collaboration and data sharing with entities like The Water Institute of the Gulf or the LSU Center for Energy Studies for how these partnerships can enhance or support the State’s work. It does allow for adding different funding support needed for science and data sources while providing for independent input for natural resource management.

CPRA

It is understandable that the DRIVE initiative is reviewing how the state is managing coastal restoration and flood protection. Having a Governor’s Office of Coastal Activities elevates the importance of our coastal resources and attendant land loss. It has been incredibly helpful to have CPRA created and function as it does today to integrate protection and restoration planning for the entire coastal zone. This work requires a broad focus that transcends more than one state and agency and draws interest from a large and diverse group of stakeholders. We, therefore, continue to advocate for maintaining CPRA as an independent agency as it is structured today.

The size of Louisiana’s coastal zone and the scope of planning and management of restoration and flood protection in that vast estuarine area warrants a focused agency, as CPRA is, to coordinate it. CPRA should stay focused on that purpose to continue the good progress that has been made. Adding management of flood protection in other areas of the state to CPRA’s mission could hinder its effectiveness for the unique estuarine habitat and tidal influences being managed.

LWF appreciates the administration seeking ways to expand and create funding for coastal projects identified in the state’s Coastal Master Plan. It is crucial that State government and citizens stay focused on the projects and funding needed to maintain stability and sustainability to Louisiana’s coastal zone in the coming decades.

In the presentation to the NRSC, CPRA’s expertise was touted, and it was suggested that this experience could provide guidance and assistance to DENR in developing its contracting services in order for DENR to effectively manage increased federal grants. But LWF would not support combining and restructuring CPRA in such a way to provide services to both. LWF does not support moving CPRA into DENR.

In the presentation, we heard that while CPRA cited its proficiency in procuring projects, they have now had to transfer that responsibility to the Office of State Procurement which has consolidated all procurement. But the Office of State Procurement does not have the in-house expertise of CPRA. LWF urges the state to return that function to CPRA and allow them to enhance their staff to procure projects.

Boards and Commissions

JML 24-13 called for a review of all natural resources-related boards and commissions. The initial review report identified the overly large size of membership or overlapping purpose as reasons to consider trimming or eliminating a board or commission. Maintaining broad representation for input from diverse interests and providing a forum for public input and visible decision making are very important purposes of commissions, advisory groups, and boards.

LWF respectfully asks: Are members not being appointed to these boards and commissions? Are meetings being called but appointed members are not attending? Merely because meetings are not being called does not mean there is no interest.

There are three boards and commissions, in particular, that LWF believes serve a vital role and should continue:

The CPRA Board and Governor's Advisory Commission for Coastal Protection, Restoration and Conservation have different purposes and allow for different members to fulfill the needs of leadership and engagement for Louisiana's substantial coastal wetland loss and management. When considering whether to reduce the Governor's Advisory Commission, careful consideration should be given to who or what organizational representation is being recommended for removal and whether that eliminates voices representing key constituencies.

LWF has previously stated that the Oilfield Site Restoration Commission serves an important oversight role and brings together industry and environmental groups to work on the real safety and environmental concerns presented by the large amount of abandoned oil wells in the state.

LWF continues to support the Water Resources Commission for providing a useful role with input from the varied stakeholders as Louisiana pursues comprehensive water management for the State. Water is a strategic and valuable natural resource for the state and poor management of it impacts everyone.

We offer these comments for consideration as you move forward in recommendations and action and please call on LWF for any assistance we can provide in engagement or analysis.

Sincerely,



Rebecca Triche
Executive Director