



LOUISIANA WILDLIFE FEDERATION

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

PO Box 65239, Baton Rouge, LA 70896
8480 Bluebonnet Blvd. Suite F, Baton Rouge, LA 70810

(225) 344-6707
www.lawildlifefed.org

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J. Clay Parker
Special Counsel
Governor's Office of Coastal Activities

Email: clay.parker@la.gov and driveinitiative@la.gov

Re: Draft Report of The Natural Resources Steering Commission Pursuant to Executive Order JML 24-77

Louisiana Wildlife Federation (LWF) appreciates the opportunity to comment on the "Draft Report of the Natural Resources Steering Commission," a direct result of the Governor's executive order, Departmental Review for Innovation and Visionary Enhancement (DRIVE), and reorganization of the Department of Energy and Natural Resources (DENR).

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

LWF commends the immense work of the Governor, the Steering Commission, and DENR that has gone into the recommendations of the draft report with a purpose of modernizing and streamlining natural resource management around the state.

While there are a number of admirable recommendations included in the draft document, including the need for DENR internal restructuring around permitting and enforcement, there are a number of recommendations that are either unclear or confusing at this time. While some of these recommendations may be explained further during a public meeting to be held one day after written comments are due, these written comments must rely solely on the draft document provided.

In general, the biggest concern is the apparent lack of public input and stakeholder engagement included in some of the more outward facing aspects of the recommendations. For example, there is little indication that levee boards, water commissions such as the Sparta Ground Water Commission, the Louisiana Watershed Initiative, or many other groups currently working on water management and flood control were included in discussions about forming an Upland Resource Management Authority.

In addition, with the release of the document late in the evening of Friday, Sept. 13, just days after Hurricane Francine made landfall in the state, and comments due by midnight Thursday, Sept. 19, there was little time to read and digest the draft recommendations. The decision to have public comments due nine hours before the public meeting neither allows for inclusion of public comment in the discussion nor allows for the benefit of hearing the presentations at the public meeting which may have answered many of the following questions.

Relying on the draft document, LWF outlines our thoughts, and sometimes concerns, about the recommendations presented in the following comments.

NRSC-1-2024: Implementation

The recommendations include the formation of a five-member Steering Commission that would include “(1) a commissioner representing coastal activities, (2) a commissioner representing statewide interests on natural resources and energy resiliency and infrastructure, (3) a commissioner representing finance, economic development, and planning, (4) a commissioner representing the head of the Department of Energy & Natural Resources, and (5) a commissioner representing energy resources management.”

Currently, the Steering Committee makeup doesn’t specifically include representation from Louisiana Coastal Protection and Restoration Authority (CPRA) or the envisioned Upland Resources Management Authority (URMA). As the leaders of these two organizations will have essential knowledge and expertise on their respective duties, it seems imperative that they also have a formal place on the Steering Committee.

The recommendations also call for the Governor’s Office of Coastal Activities (GOCA) to take on a statewide planning and policy role in order to provide strategic direction for CPRA (for coastal areas) or URMA (for non-coastal areas). This Planning and Policy (PP) would take on the roles of developing strategic direction, evaluation of cost estimates, and project specifications leaving CPRA and URMA with the sole duty of implementation. As stated in the recommendations, this stripping of duties from CPRA flies in the face of previous praise of CPRA’s effectiveness as an organization toward a well-defined goal of coastal restoration and protection.

For example, Louisiana’s Coastal Master Plan receives international praise not because it is a list of projects, but because it is a deeply researched, science-based plan that evaluates cumulative impacts, benefits, and costs for the larger good. In short, the Coastal Master Plan is a coastal strategy that is underpinned by lessons learned, up-to-date science and research, and extensive stakeholder input which is updated every six years specifically in order to incorporate new discoveries and science. As a result of this extensive input, the Louisiana Coastal Master Plan receives unanimous approval from the legislature.

As part of this, there is an implementation plan in the form of CPRA’s Annual Plan which outlines the short-term spending expected on projects, already vetted through the Coastal Master Plan process.

Taking away this planning and budgetary work from CPRA would essentially turn the authority into a construction firm that has no control over the sequence of construction or the benefit of long-term construction goals as found in the Coastal Master Plan and Annual Plan.

In short, the current recommendation adds layers of bureaucracy to fixing a problem that doesn’t exist at CPRA, i.e. lack of planning, policy, and cost analysis. These recommendations seek to reform a process so valued that the Natural Resources Steering Commission holds it up as the example other state agencies should emulate. From the report, “In contrast, CPRA and GOCA have shown how a well-integrated planning process at the intersection of the Executive and Legislative branches can provide strategic oversight and growth opportunities.”

Even if the PP were to form a team to perform this work from current employees at CPRA, Department of Transportation and Development, and Department of Energy and Natural Resources, the learning curve of building a new team to deliver these guidance documents for the coast, such as the Coastal Master Plan, would defeat the Commission’s statement that the work would be done “with consideration not to dilute a coastal focus.”

CPRA was formed in 2006 for the express reason of bringing together coastal duties previously scattered among different state agencies into a single entity with no divided loyalties. The recommendations

presented in this report represent a step backwards for the state's coastal efforts at the exact time we should be looking forward to address our coastal crisis.

The formation of URMA would be modeled on CPRA and would be focused on non-coastal flood protection. Flooding is not just a coastal concern as the 2016 floods clearly demonstrated and this is a great step in continuing to recognize statewide vulnerability. However, it is unclear how the ongoing Louisiana Watershed Initiative will be incorporated into these efforts, how URMA will be staffed, and where funding for the program will be generated. Although the report states that the Natural Resources Trust Authority will be "valuable funding mechanism" for both URMA and CPRA, it is unclear how that funding structure will be set up and how it will be distributed. More details on the funding mechanisms and distribution are needed.

NRSC-2B-2024: Boards & Commissions

In this section there is a recommendation to reduce the size of the "CPRA Advisory Board" by half. It is unclear whether this refers to the CPRA Board or the Governor's Advisory Commission on Coastal Protection, Restoration, and Conservation.

If this refers to the CPRA Board, concerns arise from reducing the board to the point that it ceases to serve the function of representing the broad range of interests across Louisiana's coast. The issues facing southwest Louisiana are very different than those that face south central or southeast Louisiana and those voices can be lost if the board is made up of only members who live and work in Baton Rouge or southeast Louisiana.

If this refers to the Governor's Advisory Commission on Coastal Protection, Restoration, and Conservation, a group that performs a very different function than the CPRA Board, this is also a concern. The Governor's Advisory Commission on Coastal Protection, Restoration, and Conservation provides a valuable service in bringing more voices to the critical issues of coastal restoration and protection in the state and over the years has been a forum to vet different coastal concepts, funding mechanisms, and projects. Reducing this group by an arbitrary number (half) would effectively reduce the voice of important coastal voices in the ongoing discussion about the future of Louisiana's coast. We would recommend a conversation with the commission to reexamine membership makeup before decisions are made about what sectors of the coastal community should be removed.

NRSC-3A-2024: Natural Resources Trust Authority

The Steering Committee recommends collaboration between DENR and CPRA to enhance collaboration and creation of a workflow that allows the two agencies to collaborate on grant support through the Indefinite Delivery Indefinite Quantity Process. While using CPRA's work as a model is laudable, we have concerns that collaboration may take away from CPRA's specialized work

In addition, it is unclear how the Coastal Trust Fund will, or won't, be incorporated into the Natural Resources Trust Authority. If it is incorporated, it appears that the State Mineral and Energy Board would have authority over these funding streams without the mandate of coastal restoration and protection currently housed at CPRA and GOCA.

A clearer outline/flowchart is needed for how this Natural Resources Trust Authority will work, what funding streams will be included, how it will fund the additional URMA creation, and how funding will be allocated.

The Natural Resources Steering Commission recommendation report states that, "By enhancing transparency and financial oversight, the Trust will gain legislative support, as lawmakers will be reassured that public funds are being managed responsibly and in alignment with the state's strategic

goals.” However, CPRA already enjoys legislative support and produces transparency in planning, policy, and spending through the Coastal Master Plan and the Annual Plan process.

General comments

The reorganization and renaming of a number of departments would be greatly clarified through an organizational chart from the Natural Resources Steering Commission that clearly shows how responsibilities and authorities would flow within the proposed changes. There are also a number of areas that are labeled as needing continued exploration which ultimately could influence the feasibility of recommended changes. We would recommend taking the time to work out more details on the general concepts presented here before moving these recommendations toward adoption.

We would disagree with the report’s conclusion that states, “The structure proposed herein also addresses public comments in *ensuring CPRA remains independent* and improves the function of all offices within the state’s natural resources management structure.”

While it is true that CPRA is left to be independent, large portions of what makes the agency successful such as science-based strategic planning, implementation annual planning, and broad stakeholder engagement, would be removed through this plan. CPRA would essentially be an implementation organization, taking away the greatest strengths of the program which has been the planning, prioritization, and funding analysis to develop and implement a rigorous, science-based approach to comprehensive coastal restoration.

In addition, it isn’t clear from the document what entity will be responsible for response and coordination before, during, and after tropical storms and hurricanes. Currently, CPRA provides a central clearing house for requests for many coastal parishes in facilitating preparation and recovery work. Will this aspect now be housed in PP or individually in CPRA and URMA?

Also, the current recommendations don’t provide any analysis of what this reorganization as proposed will cost (moving programs, staffing requirements, permit consolidation savings, etc.) or how much it will save the state. While only one measure of efficiency, the cost/benefit of making these changes seems critical in determining whether the recommendations will be beneficial in the short or long-term management of these critical natural resources.

We understand the Natural Resources Steering Commission was given an extremely difficult task of both streamlining for efficiency while also creating new organizations with added responsibilities and duties. Our criticisms and concerns listed here are offered in the spirit of helping you succeed for the benefit of the state.

Again, thank you for the opportunity to comment on this ambitious undertaking for the state of Louisiana.

Please reach out if we can provide any assistance.

Sincerely,



Rebecca Triche
Executive Director