



# LOUISIANA WILDLIFE FEDERATION

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

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Re: Ongoing Feedback and Input on Proposed Reorganization Phase 5 Outline Draft – 2024 JML-13

Louisiana Wildlife Federation (LWF) appreciates the opportunity to comment on the “Ongoing Feedback and Input on Proposed Reorganization Phase 5 Outline Draft – 2024 JML-1” document.

LWF commends the immense work the Department of Energy and Natural Resources (DENR) has put 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 clear recommendations included in the draft document, including the adoption of a five-year planning horizon, development of more specific job descriptions, and a push to foster innovation, there remains a number of questions, concerns, and confusion around several elements.

Under the Strategic Governance section, the document outlines the creation of the Natural Resources Commission (in previous documents called the Steering Committee) that would include seven members made up of agency executives involved in natural resources management and one representing statewide flood control interests.

As outlined in this draft, the proposed Natural Resources Commission 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 commission. In addition, the current document names a seventh member who would represent statewide flood control interest and says it would be the chief executive of (...) as appointed by the Governor, but it is unclear which organization is being referred to in this instance on page 9 of the document.

For a commission where one of the main missions would be inter-agency collaboration, particularly flood management and coastal restoration, not including the state's lauded coastal agency on the commission is an oversight that needs to be corrected. In multiple places, both in this current document and previous iterations, the success and efficiency of CPRA has been lauded as a model for other state agencies to follow. That kind of experience should be exactly what the state would want to include on a newly formed Natural Resources Commission.

As stated previously, there are a lot of admirable changes included in the report such as streamlining operations, job descriptions that focus on duties rather than compliance, and restructuring the department's culture.

However, while there is an entire page dedicated to “Developing a Proactive Approach to an Innovative Culture,” there is no equal emphasis on how some of the major changes such as the development of URMA or the integration of CPRA are expected to unfold.

During the previous hearing on September 20, 2024, the audience was told that many of the questions about CPRA would be addressed through a more detailed DENR document expected in a few months. However, this more detailed account of DENR reorganization gives very little detail in terms of how URMA and CPRA would operate, how the now-Natural Resources Commission would interact with URMA and CPRA, and how the Coastal Protection and Restoration Authority board and the Governor's Advisory Commission on Coastal Protection, Restoration and Conservation would be impacted or changed as suggested in the previous document.

As briefly outlined in the current document, Natural Resources Commission would handle communications and public engagement with coordination with both CPRA and URMA. It's unclear what outreach this would involve. For example, in just the production and planning for the 2023 Coastal Master Plan, CPRA and its partners had 218 engagement touch points including 74 public briefings, 23 conferences and 28 regional workgroup meetings. Just this one plan development included more than 200 hours of engagement, with 118 technical partners from 31 organizations, involving 113 advisory group members from 85 organizations ([2023 Louisiana Coastal Master Plan, page 19](#)).

It is this level of community engagement that has made the Coastal Master Plan so successful over the years in bringing science-based decision making to some of the toughest choices facing our coast. It's unclear if DENR intends for the Natural Resources Commission to take over this kind of work, or be an umbrella for statewide initiatives.

LWF applauds the formation of URMA, but it appears that the organizing framework for the new group has drastically changed since it was last publicly discussed. First, it appears that the intent is to expand the Red River Waterways Commission to take over the role as URMA, but it is not clear if this authority would expand slightly or if it would expand to take over flood protection for all non-coastal areas. Funding for URMA would come from a dedicated \$20 million annually, but it is not made clear where this money would come from and whether it would be transferred from the Department of Transportation and Development or if it would be new funding.

In addition, the Natural Resources Commission would be "replacing temporary committees or task forces," but there are no specifics given on which committees or task forces are envisioned to be replaced.

The inclusion of some workflow charts was helpful to a point, but many also created more confusion. For instance, the workflow chart on page 10 outlines that the Office of Natural Resources Commission will have three main inflows from intergovernmental affairs, commission affairs, and communication. However, this and the adjoining offices all flow into the Department of Energy and Conservation. That name is repeated on page 11 on the same diagram as Department of Energy and Natural Resources. Consistency on the department's name, other than in the section that discusses the rebranding, would help clarify the document and workflow structure. Other clarity issues would include making sure to include captions under graphics to better explain what they are trying to represent (page 14, page 19).

In addition, the plan calls for an annual review and legislative feedback on URMA and CPRA. Currently, CPRA already undergoes this kind of review through the [development of the Annual Plan](#) and subsequent approval through the legislature. Any additional annual review would be a duplication of efforts and onerous on the CPRA staff, taking away time from the important work of coastal restoration and protection.

In addition, while the document talks about nuclear energy, wind, solar, hydrogen, and other renewable energies aren't included in the document (other than a brief mention of decommissioning) despite the [billions in investments that are taking place in Louisiana around renewable energy](#). There are real needs

around facilitating this boom in energy investment with DENR being the prime department responsible, which should be reflected in any reorganization effort.

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 24 affiliates across the state and more than 12,000 individual members prioritize coastal sustainability, comprehensive water management, and wildlife conservation as crucial for Louisiana's economic and environmental stability.

Again, thank you for the opportunity to comment on this ambitious undertaking for the state of Louisiana. Our criticisms and concerns listed here are offered in the spirit of helping you succeed for the benefit of the state.

Please reach out if we can provide any assistance.

Sincerely,

A handwritten signature in cursive script that reads "Rebecca Triche".

Rebecca Triche  
Executive Director