



## 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](http://www.lawildlifefed.org)

September 5, 2025

Amelia Wolfe  
Office of Wildlife - Scenic Rivers  
Louisiana Department of Wildlife and Fisheries  
P. O. Box 98000  
Baton Rouge, LA 70898-9000

via email [awolfe@wlf.la.gov](mailto:awolfe@wlf.la.gov)

RE: NOI to amend the LDWF Natural and Scenic Rivers Program

Dear Ms. Wolfe and LWF Commissioners:

Louisiana Wildlife Federation (LWF) is providing written comment on the Notice of Intent (NOI) to modify LAC 76: IX.103, 109, 111, 117, and 118, to make changes to the Louisiana Department of Wildlife and Fisheries (LDWF) Natural and Scenic Rivers Program by clarifying allowable timber harvest activities, reducing the evaluation period and the number of publications required by permit applicants, extending the term for which permits are valid, and adopting new rules for expedited permitting.

The Louisiana Legislature created the Louisiana Natural and Scenic Rivers System in 1970. From small creeks to large rivers, the Louisiana Department of Wildlife and Fisheries administers the Scenic Rivers Program, encompassing over 60 waterbodies constituting an estimated 3,100 miles of the state's streams, rivers and bayous. Waterways accepted into the system as a Louisiana Designated Historic or Natural & Scenic River are afforded safeguards that protect the aesthetic, scenic, and recreational qualities of the body of water. In addition, the protection of the stream's fish, wildlife, botanical resources, and the stream's natural and physical features are preserved.

These benefits are accomplished in part by ensuring certain activities are prohibited on designated Natural and Scenic Rivers because of their detrimental ecological impacts on the streams. These prohibited activities currently include channelization, clearing and snagging, channel realignment, reservoir construction, commercial cutting of trees within 100 feet of the ordinary low water mark, and the use of a motor vehicle on the stream. A Scenic River Permit is required for all activities on or near system rivers that may detrimentally impact the ecological integrity, scenic beauty or wilderness qualities of those rivers. These permits, when granted, contain specific conditions aimed at preserving the stream's natural character and quality.

The current NOI, as submitted, proposes the following specific changes to the permit process that the LWF would like to provide comments on for each.

The first modification identified in the rule change is the effort to clarify allowable timber harvest activities within 100' of designated scenic rivers. This change addresses the removal of trees, either as single scattered individuals, or in small groups, whereby the remaining average basal area

is no less than 50 square feet per acre. The select harvesting of trees, adjacent to or within the 100' buffer of a Scenic River, in accordance with R.S. 56:1854, would be allowed, provided that the harvest methodology is compliant with the definition of selective harvesting under §103. These regulations include the requirement that written notification of selective harvesting is given to the Louisiana Office of Forestry and LDWF Scenic Rivers prior to commencement. LWF recognizes that the previous methodology used to evaluate the removal of trees along a scenic river was often identified as confusing and inconsistent with current forestry practices. LWF can support this correction as an effort to eliminate the confusion related to timber harvest and to be more consistent with current best practices of forestry management.

The second change to the regulations would seek to reduce the evaluation period for permits from 45 days to 30 days, as well as reduce the required number of public notice publications from 3 to 1. These changes can be acceptable if an effort is made to balance the process by providing a vehicle for online access to permits and public notices on the LDWF Website. Public notices are necessary to serve the public's best interests. Providing real-time access to this information would be consistent with other state agencies in how permits are presented for public review. Locating all permits, applications, and notices on the LDWF Website would provide real-time transparency and streamline the permitting process.

Third, the proposed NOI seeks to extend the term for which permits are valid. Current regulation states that permits shall expire if the activity has not begun within 18 months of permit issuance, except that the administrator may grant a maximum of two extensions of six months each. The proposed change would increase the expiration time frame to two years, for the start of activity, and would extend the extensions allowed to one-year time periods. While LWF views the current time structure as adequate, we do not oppose the extension modifications.

Lastly, the NOI seeks to establish a General Permit process that would allow LDWF to, without inspection, approve permit activities that have been determined to have no significant deleterious impact on the system. A General Permit, which, if granted, could afford a more expeditious review process and would not require a public comment period. Such activities would require the evaluation set forth in §117.C-G and are limited to the following categories:

1. General maintenance of existing structures, to include in-kind replacements. Specifically, when the original project was unpermitted. (Bridges are not included.)
2. New residential construction of non-inhabitable structures over water including, but not limited to, pilings, boat sheds, docks, walkways, and piers. Such structures shall be designed in compliance with all applicable regulations and law. Under this category, the structure size shall be no greater than 800 square feet.
3. New bank line stabilization projects. Under this category, bank line stabilization shall be limited to 200 linear feet with minimal backfill. Concrete mats and other similar structures will not qualify.
4. New boring or horizontal directional drilling (HDD) installation of sewer lines, water lines, and transmission cables. Overhead transmission lines and rights-of-way will not qualify.
5. Rebuilding or renovations of a single residence or camp. Shall not include commercial operations or activities. Must have sanitary treatment plan and Department of Health approval prior to issuance of this general permit.
6. Maintenance and dredging of existing boat slips and boat ramps.
7. Habitat improvements to riparian ecological functions within 100' buffer when exceeding the selective harvest definition as outlined in §103.

We acknowledge that streamlining these activities would allow staff more time to manage larger permit requests. But new bank line stabilization projects, maintenance dredging, and undescribed habitat improvements to riparian ecological functions should remain within the normal permitting process. These activities have the potential to significantly impact the waterbody in question and maintaining oversight of these activities would be in the best interest of the river, as well as the public.

Further, LWF recommends reestablishing the Scenic River Advisory Council to provide guidance and oversight to the program to help address the growing challenges faced by our scenic rivers system. The Scenic Rivers Program offers a unique opportunity for individuals and communities to get involved in protecting, conserving, and preserving two of Louisiana's greatest natural resources, its water and its wilderness. Too often, attacks from development and industry have threatened to remove the protections that have served to safeguard our natural resources, and we believe that restoring the Scenic Rivers Advisory Council would provide an additional layer of accountability for all parties involved.

We applaud the State of Louisiana for their efforts to have strong restrictions and protections on our scenic waterways that preserve these precious resources for future generations. LWF was a leader in establishing Louisiana's Natural and Scenic Rivers System 55 years ago. Decisions that impact flood control management and river management must be made based on good information and provide meaningful participation in the permitting process, especially for those who might be impacted by those decisions. The Natural and Scenic Rivers Program is working, and these streams and rivers deserve to be properly managed so that they continue to provide services such as floodwater storage, fish and wildlife habitat, and opportunities for residents and visitors to enjoy.

Louisiana Wildlife Federation is a statewide, nonprofit organization that represents 23 affiliate organizations and more than 11,000 members dedicated to the conservation of Louisiana's wildlife and natural resources.

Thank you for your consideration of these comments.

Sincerely,

*Rebecca Triche*

Rebecca Triche  
Executive Director  
Louisiana Wildlife Federation