



LOUISIANA WILDLIFE FEDERATION

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

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Louisiana Department of Conservation and Energy
Office of Coastal Management
Attn: Lorna Putman-Duhon
P.O. Box 44487, Baton Rouge, LA 70804
lorna.putman-duhon2@la.gov

RE: Coastal Use Permit P20260483 (Stream West Park-and-Ride, Johnson Bayou) and
Related Applications P20260482 and P20260563

Dear Ms. Putman-Duhon:

The Louisiana Wildlife Federation (LWF) submits these comments on Coastal Use Permit application P20260483, the proposed 665-vehicle Stream West park-and-ride facility near Young's Road in Johnson Bayou, Cameron Parish.

Founded in 1940, LWF is Louisiana's oldest and largest conservation organization, representing more than 11,000 members and 23 affiliate organizations dedicated to the stewardship of Louisiana's fish, wildlife, and coastal habitat. Our comments are confined to that mission: the impacts of this facility on wildlife and wildlife habitat.

LWF does not oppose the Commonwealth LNG project or the workforce it supports. Our concern is the siting of a large, lit, and continuously trafficked parking installation within the coastal habitat of western Cameron Parish, one of the most important landscapes for migratory birds and coastal wildlife on the Gulf of America.

Western Cameron Parish is a landscape of national importance to migratory birds and coastal wildlife.

The cheniers, marshes, beaches, and wetlands of the Johnson Bayou area sit within one of the most significant migratory corridors on the continent. For neotropical songbirds completing the nonstop crossing of the Gulf of America each spring, this coastline is the first landfall, the place exhausted migrants rest and feed before continuing north along the Mississippi Flyway. The same landscape hosts the Peveto Woods Bird Sanctuary and supports shorebirds, wading birds, waterfowl, raptors, and countless other species year-round. The Stream West site lies within this broader habitat system; impacts to it are not confined to its footprint, because birds, water, and wildlife move across the surrounding cheniers and marsh.

A facility of this size introduces disturbances that fall directly on migratory and coastal birds.

A 665-vehicle park-and-ride operating on a construction schedule, with shuttle service and daily vehicle turnover, introduces the categories of disturbance most damaging to migratory and resident birds in a coastal setting:

- Artificial light at night. Security and operational lighting is the foremost wildlife concern. Night-migrating songbirds orient by natural light cues, and artificial light draws them off course, disorients them, and causes collisions and fatal energy depletion, harm concentrated along exactly this stretch of first-landfall coast. LWF urges that no permit issue without a binding, enforceable lighting plan: full cut-off, downward-directed, shielded fixtures, minimized height and intensity, motion-activation where feasible, and dark-sky-compliant design consistent with Lights Out principles.
- Noise and continuous disturbance. Sustained vehicle and shuttle activity degrades the resting and feeding function of surrounding chenier and marsh habitat during the narrow, energy-critical migration window.
- Habitat loss and hydrology. Clearing and filling coastal land for impervious parking removes and fragments marsh and chenier-edge habitat used by shorebirds, wading birds, and waterfowl, and can alter local hydrology across a wider area than the development footprint itself.
- Stormwater runoff. Runoff from a large impervious surface, carrying automotive fluids and sediment, discharging into adjacent coastal wetlands and waters presents a water-quality concern for that habitat and the fisheries it supports.

The cumulative impact must be evaluated as a whole.

This facility is one of three park-and-ride applications — P20260482, P20260563, and P20260483 — all supporting the same Caturus/Commonwealth LNG construction project and together adding more than 2,000 worker vehicles daily to this coastal landscape. Reviewed separately, no single proceeding accounts for their combined lighting, traffic, habitat, and hydrologic effects. Cumulative impact cannot be assessed one permit at a time; it can only be understood by considering the facilities together. LWF respectfully requests that the Department suspend the three separate proceedings and consolidate them into a single public hearing in Johnson Bayou, so that the combined effect on wildlife, habitat, and coastal resources can be evaluated on one record before any permit is issued.

Recommendation.

The Louisiana Wildlife Federation respectfully requests that the Department: (1) not issue Coastal Use Permit P20260483 as proposed; (2) consolidate P20260482, P20260563, and P20260483 into a single public hearing addressing their cumulative impacts; and (3) condition any approval on a binding, enforceable dark-sky lighting plan and appropriate stormwater and buffer measures sufficient to protect the surrounding coastal habitat and the migratory birds that depend on it. These are reasonable, habitat-focused safeguards for a landscape of national

significance to migratory birds, and they can be achieved without preventing the workforce staging the project requires.

Thank you for your consideration. LWF welcomes the opportunity to participate in a public hearing and to provide additional information at the Department's request.

Respectfully submitted,

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