



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 P20260563 (Targa Park-and-Ride, Johnson Bayou) and Related Applications P20260482 and P20260483

Dear Ms. Putman-Duhon:

The Louisiana Wildlife Federation (LWF) submits these comments on Coastal Use Permit application P20260563, the proposed 900-vehicle Targa park-and-ride facility in Johnson Bayou, Cameron Parish.

Founded in 1940, LWF is one of 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 this facility, a large, lit, continuously trafficked parking installation, immediately across the highway from Peveto Woods Bird Sanctuary, one of the most significant migratory bird sites on the Gulf Coast.

Peveto Woods is a coastal chenier of national significance.

Peveto Woods Bird Sanctuary is internationally recognized as a premier trans-Gulf migratory stopover. For neotropical songbirds completing the nonstop crossing of the Gulf of America each spring, cheniers like Peveto are the first landfall, the place exhausted migrants drop in to rest and feed before continuing north along the Mississippi Flyway. During migration and fallout conditions, these woods concentrate thousands of warblers, tanagers, buntings, orioles, and other species in a small, irreplaceable patch of forested ridge. The entire conservation value of the site depends on its remaining a quiet, dark refuge where depleted birds can recover.

The proposed facility places that value directly at risk.

A 900-vehicle park-and-ride operating on the construction schedule described, with continuous shuttle service and daily vehicle turnover, introduces exactly the disturbances most damaging to a migratory stopover, immediately adjacent to the sanctuary:

- Artificial light at night. Security and operational lighting at a facility of this size is the foremost 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 that falls hardest on precisely the exhausted migrants Peveto Woods exists to shelter. 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 function of an adjacent stopover, where the birds' survival depends on undisturbed feeding and recovery during a narrow migration window.
- Habitat and hydrology. Clearing and filling coastal land for impervious parking alters the marsh and chenier-edge habitat that supports shorebirds, wading birds, and waterfowl beyond the wooded sanctuary itself, and can affect local hydrology.
- Stormwater runoff. Runoff from a large impervious parking surface, carrying automotive fluids and sediment, discharging into adjacent coastal wetlands and waters presents a water-quality concern for the 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. Reviewed separately, no single proceeding accounts for their combined footprint, lighting, traffic, and habitat effects. Cumulative impact is not the sum of three permits considered in isolation; it can only be assessed 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 P20260563 as proposed; (2) consolidate P20260482, P20260563, and P20260483 into a single public hearing addressing their cumulative impacts; and (3) condition any approval of a facility adjacent to Peveto Woods on a binding, enforceable dark-sky lighting plan and appropriate stormwater and buffer measures sufficient to protect the sanctuary's function as a migratory stopover. These are reasonable, habitat-focused safeguards for a site 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,

Rick Owens
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