

1. To Whom it May Concern:

I am very opposed to eliminating the Coastal Protection and Restoration Authority as an independent agency. The CPRA has a vital, independent role in working to stem the land loss crisis in Louisiana through development and implementation of the scientifically designed Master Plan. The Department of Energy and Natural Resources may have conflicts of interest that limit its ability to make the best decisions to stem this crisis. The continued land loss, coupled with sea-level rise and increased severity of hurricanes, has lead to an insurance crisis in the state as well, that very may well lead to an economic crisis. The future of Louisiana is at stake.

Sincerely,

Stephan D. Howden

713 Colbert St.

Mandeville, LA 70448

showdens@gmail.com

2. **Stakeholder Information:**

Full Name: Laura Comiskey Broders

Louisiana Resident: Yes

E-Mail Address: lgcbroders@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? I am opposed to eliminating CPRA as an independent agency and placing it within DENR. CPRA is an implementation agency that develops, oversees and implements a scientifically based Master Plan. DNR issues and enforces permit requirements. There is a definite conflict here which will result in a less effective and productive CPRA. Two totally and distinct missions.

How has or may it impacted you? Your organization?

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? In-Person

3. Dear Governor Landry,  
I am opposed to eliminating CPRA as an independent agency and placing it within DENR. CPRA is an implementation agency that develops, oversees and implements a scientifically based Master Plan. DNR issues and enforces permit requirements. There is a definite conflict here which will result in a less effective and productive CPRA. Two totally and distinct missions.  
Yours very truly,  
Laura Comiskey Broders  
New Orleans  
[lgcbroders@gmail.com](mailto:lgcbroders@gmail.com)
  
4. I'm writing to voice my opposition to eliminating the Coastal Protection and Restoration Authority as an independent agency. Our land loss crisis is an existential crisis that negatively impacts our way of life and culture. Because of this, CPRA deserves a prominent position within the state government, not buried within a division of the Department of Energy and Natural Resources. The regulatory agency that issues and enforces permit requirements has a definite conflict of interest with CPRA, which as an implementation agency develops, oversees and implements a scientifically based Master Plan. The agencies have two totally unique and distinct missions.  
David Kroll  
2800 Octavia St.  
New Orleans, LA 70115  
[David.s.kroll@gmail.com](mailto:David.s.kroll@gmail.com)
  
5. I am opposed to eliminating CPRA as an independent agency. It has soared under four governors, creating the master plans for coastal restoration as well as executing these projects. One can't challenge or criticize its success!  
CPRA must remain an independent agency. Serious legislation has occurred over the past 20 years which resulted in a single state entity able to prioritize Louisiana's coastal protection and restoration efforts in a comprehensive and principled manner. Look at what has been accomplished!  
CPRA is an implementation agency that develops, oversees and implements a scientifically based Master Plan. DNR issues and enforces permit requirements. There is a definite conflict here which will result in a less effective and productive CPRA. Two totally and distinct missions.  
Marion "Penny" Freistadt, PhD, MBA, MSc  
504-352-2142  
[marionfreistadt@yahoo.com](mailto:marionfreistadt@yahoo.com)
  
6. I am against the elimination of CPRA as an independent agency. Its success has been extraordinary. In 2024 this independent agency is overseeing \$1.6 Billion dollars in coastal projects, which benefit our citizens and state. If it ain't broke...what are you fixing?  
940 Poydras St., Apt 1304  
New Orleans LA 70112

Donna Wakeman  
Donna.wakeman@gmail.com

7. Dear Gov. Landry and other pertinent state officials,  
Since its creation in recognition of the importance of coastal and hurricane protection, the Coastal Protection and Restoration Agency has been independent and extraordinarily successful in overseeing and safeguarding the projects that are so vital to our state's endangered coast. Please ensure that it remains an independent agency, not subject to political interference, or subsumed into another entity with different goals.  
Sincerely,  
Jim Amoss, resident of New Orleans  
Sent from my iPhone  
Jamoss3@aol.com
  
8. Many concerned citizens are opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture, and all the things we love about our state.  
CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different and arguably conflicting mission.  
CPRA is an implementation agency that develops, oversees, and implements a scientifically based Master Plan. DNR issues and enforces permit requirements.  
The inherent conflict will result in a less effective and productive CPRA, to the detriment of the people of our state.  
The executive order should be rescinded.  
Brooke Duncan III  
504-453-3971  
Brooke.duncan.nola@gmail.com
  
9. Dear Sir or Madam,  
I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture, people's livelihoods, and all the things we love about our state. CPRA deserves a prominent position within state government. It should not be buried within a division of a regulatory agency that has a completely different mission.  
Thank you.  
Carol Gniady  
910 St. Roch Avenue  
New Orleans, LA 70117  
carolgniady@icloud.com
  
10. Please mark me down as one among those many thousands of people who oppose the recent proposal to sever the independence of our CPRA. The agenda of the CPRA should be that of an independent science – based institution. To inject politics into it now, after, four governors and many years of independence, that is not a good idea. Here's why I think so.

First, I assure you that I am reasonably well informed as to the engineering, design, construction schedule, efficacy, and projections for this desperately needed project. I have attended meetings, spoken with many others, and visited the site.

Newspaper headlines just this week again report that another study, this one by a distinguished Tulane team of relevant scientists, confirms that we are on track - without doing anything - of losing a Connecticut sized chunk of our precious coastal wetlands in just 50 years. We've already lost a chunk the size of Delaware. Please, let's do better for our progeny and our legacy.

Thank you.

David Campbell,

Folsom, Louisiana.

davidcampnola@gmail.com

11. Dear Sirs:

It has been brought to my attention that Governor Landry recently issued an Executive Order to explore merging Louisiana's Coastal Protection and Restoration Authority (CPRA) with the state's Department of Energy and Natural Resources (DNR). In my opinion, the consolidation of the CPRA with the DNR would be a mistake as the two agencies' missions are separate and distinct: 1) the CPRA's principal objectives are to protect and restore Louisiana's coastline, and to create and implement flood / coastal protection projects, while, 2) the DNR is an entity that focuses primarily on energy issues.

CPRA has very successfully accomplished its mission since its inception, and it is important that it maintains the independence necessary to continue that duty. CPRA should be allowed to exist as an independent agency, and not be subject to, or become part of, an agency that does not share a similar purpose.

In sum, the CPRA's success and independence is of paramount importance to the State of Louisiana and its citizens.

I thank you very much for your consideration of my request.

Yours sincerely,

Charles L. Whited, Jr.

1432 Octavia Street

New Orleans, Louisiana 70115

charleswhited@icloud.com

12. I'm writing to voice my opposition to eliminating the Coastal Protection and Restoration Authority as an independent agency. Our land loss crisis is an extensive crisis that negatively impacts our way of life and culture.

CPRA deserves a prominent position within the state government, not buried within the division of the Department of Energy and Natural Resources. The regulatory agency that issues and enforces permit requirements has a definite conflict of interest with CPRA.

This is an implementation agency that develops, oversees and implement a scientifically based master plan. The agencies have two totally unique and distinct missions.

Daphne Smith

daphnersmith@gmail.com



13. I'm writing to voice my opposition to eliminating the Coastal Protection and Restoration Authority as an independent agency. Our land loss crisis is an existential crisis that negatively impacts our way of life and culture. Because of this, CPRA deserves a prominent position within the state government, not buried within a division of the Department of Energy and Natural Resources. The regulatory agency that issues and enforces permit requirements has a definite conflict of interest with CPRA, which as an implementation agency develops, oversees and implements a scientifically based Master Plan. The agencies have two totally unique and distinct missions.

Jamie Amdal Hughes

Realtor, PRC Historic Home Specialist

504.300.0700 (office)

504.913.0597 (mobile)

jamie@reverealtors.com | jamie.reverealtors.com

1477 Louisiana Ave. Suite 101 | New Orleans, LA | 70115

14. Excellent! And very diplomatic!!!

Carmen L. Duncan

CRS, ABR, HHS, MBA, CLHMS

"Your Real Estate Resource"

RE/MAX n.o. properties

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New Orleans, LA 70118

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504-452-6439 Direct

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Sent from my iPhone

Carmenlduncan9@gmail.com

On Feb 17, 2024, at 3:37 PM, Anne Milling <amilling504@gmail.com> wrote:

THANK YOU, GOV. LANDRY, FOR THE OPPORTUNITY TO COMMENT ON YOU PROPOSED PLAN TO PLACE CPRA UNDER THE DEPARTMENT OF ENERGY AND NATURAL RESOURCES.

WE, THE WOMEN OF THE STORM, A NON PROFIT, NON-POLITICAL ORGANIZATION COMPOSED OF DIVERSE WOMEN FROM ACROSS LOUISIANA AND THE METROPOLITAN AREA, ARE OPPOSED TO YOUR PROPOSITION FOR THE FOLLOWING REASONS:

1. THIS AUTHORITY WAS EXPRESSLY CREATED BY STATUE IN 2005 TO BE INDEPENDENT AND LED BY THE GOVENOR'S OFFICE. REMOVING THIS INDEPENDENCE DIMINISHES THE INPORTANCE OF ONE OF THE MOST SUCCESSFUL AGENCIES IN STATE GOVERNMENT.
2. THE WOS WALKED THE HALLS OF CONGRESS IN 2006 URGING ITS MEMBERS TO PASS THE GOMESA BILL. THE KEY SELLING POINT WAS THAT THE DOLLARS WOULD BE PUT UNDER CPRA AND USED SOLELY FOR COASTAL RESTORATION AND PROTECTION. CPRA'S

INDEPENDENCE WAS CRITICAL TO GETTING GOMESA PASSED! AFTER THE BP OIL SPILL, AGAIN HAVING AN INDEPENDENT CPRA UNENCUMBERED FROM GOVERNMENT BUREAUCRACY ALLOWED US TO RECEIVE THE MILLIONS OF DOLLARS FROM THIS DISASTER.

2. THIS PROPOSITION DILUTES AND DIMISHES CPRA. DON'T BURY CPRA IN A REGULATORY AGENCY THAT HAS A COMPLETELY DIFFERENT MISSION. PLACING CPRA IN A BUREAUCRATIC QUAGMIRE IS NOT WHAT LOUISIANA AND ITS CITIZENS DESERVE.

4. IT'S NOT BROKEN...DON'T FIX IT! CPRA CONTINUES TO MAKE RECORD BREAKING INVESTMENTS IN OUR COAST. THESE PROJECTS ARE A RESULT OF THE SCIENCE LED PLANNING OF THE "MASTER PLAN." EVERY FIVE YEARS THE CPRA MASTER PLAN HAS HAD THE UNANIMOUS BLESSING OF THE ENTIRE LOUISIANA LEGISLATURE. WHY WOULD YOU WANT TO RUN THE RISK OF UNDERMINING WHAT HAS BEEN SO HIGHLY SUCCESSFUL WITH SUPPORT FROM BOTH OUR ELECTED OFFICIALS AND THEIR CONSTITUENTS?

WE APPRECIATE YOUR DESIRE TO STREAMLINE GOVERNMENT BUT THIS IS NOT THE ANSWER. IT IS OUR HOPE YOU WILL GIVE CPRA YOUR UNCONDITIONAL SUPPORT AND LET IT CONTINUE FULLFILLING ITS SERIOUS MISSION ON BEHALF OF THE PEOPLE OF LOUISIANA.

ANNE M. MILLING

FOUNDER, WOMEN OF THE STORM

15. THANK YOU, GOV. LANDRY, FOR THE OPPORTUNITY TO COMMENT ON YOU PROPOSED PLAN TO PLACE CPRA UNDER THE DEPARTMENT OF ENERGY AND NATURAL RESOURCES.

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ANNE M. MILLING  
FOUNDER, WOMEN OF THE STORM  
Amilling504@gmail.com

16. The Honorable Jeffery Landry

Governor of Louisiana

Dear Governor Landry,

As a former resident and constant visitor, I oppose eliminating CPRA as an independent agency. Louisiana's land loss crisis is an existential crisis. It impacts peoples' way of life, the culture, and everything loved about this state. CPRA deserves a prominent position within state government, not buried within a regulatory agency's division with a completely different mission.

Sincerely,

Sandra Steinberg  
slsteinberg@gmail.com

17. I am opposed to eliminating CPRA as an independent agency. It has soared under four governors, creating the master plans for coastal restoration as well as executing these projects. In 2024 this independent agency is overseeing \$1.6 Billion dollars in coastal projects, which benefit our citizens and state.

It is critical CPRA be an independent agency. CPRA is an implementation agency. There is a conflict with placing it within DENR which has a different mission and is a regulatory body which issues permits.

Louisiana needs to keep making progress with coastal preservation on the basis of good science, rather than political interests.

Barbara B. Mollere  
New Orleans, LA  
babsmollere@gmail.com

18. THANK YOU, GOV. LANDRY, FOR THE OPPORTUNITY TO COMMENT ON YOU PROPOSED PLAN TO PLACE CPRA UNDER THE DEPARTMENT OF ENERGY AND NATURAL RESOURCES.

WE, THE WOMEN OF THE STORM, A NON PROFIT, NON-POLITICAL ORGANIZATION COMPOSED OF DIVERSE WOMEN FROM ACROSS LOUISIANA AND THE METROPOLITAN AREA, ARE OPPOSED TO YOUR PROPOSITION FOR THE FOLLOWING REASONS:

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ANNE M. MILLING  
FOUNDER, WOMEN OF THE STORM  
Amilling504@gmail.com

19. Fold the Coastal Authority and Restoration Authority (CPRA) into the Department Energy and Natural Resources (DENR)?

Why do that? Does it enhance the mission of CPRA, or promise to enlarge its effectiveness and critically important functions? Not likely. A lateral move for some dubious administrative re-organization does not appear to be warranted, especially where there is demonstrated incongruity between the essential purposes of the two agencies.

This proposal, at best, must be subject to far more scrutiny than an executive order would permit. I oppose the proposed order and urge that it be withdrawn.

Michael Duplantier  
New Orleans, Louisiana  
duplantier@bellsouth.net

20. Governor Landry's idea to move the Coastal Protection and Restoration Authority into LEDNR will add a major burden to that agency. The addition almost certainly will further diminish the

effectiveness of all the programs covered, which, I suppose, could be a reflection of that man's limited insight.

However, maybe some kind of freak inversions will happen in the process, with a cessation of re-funding of coastal projects that were damaged or destroyed by tropical storms, or indefensible embarrassment of responsible parties for methane leaking oil and gas wells in the wetlands, as will be revealed by the soon-to-be-launched EDF MethaneSAT.

Yes, Landry, Make Louisiana Grovel Again! - what a legacy!

Michael Tritico

Restore Explicit Symmetry To Our Ravaged Earth

michaeltritico@yahoo.com

21. I think that is the point. Give enforcement to an agency that already does not have sufficient personnel for enforcing oil and gas regulations. The office of legislative auditor has already documented its lax enforcement efforts in several previous audits. May 28, 2014 comes to mind. You can Google it.

Sent from my iPhone

Mike Veron

mike@veronbice.com

On Feb 17, 2024, at 11:45 AM, Michael Tritico <michaeltritico@yahoo.com> wrote:

Governor Landry's idea to move the Coastal Protection and Restoration Authority into LEDNR will add a major burden to that agency. The addition almost certainly will further diminish the effectiveness of all the programs covered, which, I suppose, could be a reflection of that man's limited insight.

However, maybe some kind of freak inversions will happen in the process, with a cessation of re-funding of coastal projects that were damaged or destroyed by tropical storms, or indefensible embarrassment of responsible parties for methane leaking oil and gas wells in the wetlands, as will be revealed by the soon-to-be-launched EDF MethaneSAT.

Yes, Landry, Make Louisiana Grovel Again! - what a legacy!

Michael Tritico

Restore Explicit Symmetry To Our Ravaged Earth

22. I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture and all the things we love about our state.

CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different mission.

Thank you,

Julie & David Benson

922 Ursulines St.

jybenson@earthlink.net

23. I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture and all the things we love about our state.

CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different mission.

Gary C. Watson

Phone: 504.975.4279

Fax: 504.534.3058

Email: [gary@garywatsonllc.com](mailto:gary@garywatsonllc.com)

24. Legislators,

I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture and all the things we love about our state. CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different mission.

Brooke Randolph

6000 Dauphine

NOLA 70117

Gbrandolph2@gmail.com

25. To Whom it May Concern,

I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture and all the things we love about our state.

CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different mission.

Yours sincerely,

Katherine Cecil

katherine@cecilm.com

26. CPRA must be continued as an individual agency CPRA is an independent agency that develops and implements a scientifically based master plan. DNR is a permitting mechanism. The proposed plan would severely diminish the capacities of CPRA to restore and maintain our coastal wetlands.

Ronald J French MD

Sent from my iPhone

ronaldjrench@aol.com

27. It is imperative CPRA remain as an independent agency. Not only does this dilute and diminish CPRA as a stand alone entity at the forefront of state government but DENR (Dept. of energy and natural resources) has a completely different mission, a regulatory body which issues permits.

Respectfully,

Peter Lusk, Jr.

Founder

ProCapital, LLC

Mobile: +1-914-714-0735

www.procapitalllc.com  
SUCCEED IN RAISING CAPITAL  
pluskjr@procapitalllc.com

28. **Stakeholder Information:**

Full Name: Barbara G. Bush

Louisiana Resident: Yes

E-Mail Address: Bgbush479@gmail.com

Organization (if applicable): Citizens for 1

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Governor Landry's proposed elimination of CPRA as an independent agency

How has or may it impacted you? Your organization? CPRA must remain an independent agency. I have been involve in passing effective legislation over the past 20 years which resulted in a single state entity able to prioritize Louisiana's coastal protection and restoration efforts in a comprehensive and principled manner. This action would undermine all that we worked for and accomplished, as well as the accomplishment of CPRA as an independent agency.. I am opposed to eliminating CPRA as an independent agency. It's success has been extraordinary. In 2024 this independent agency is overseeing \$1.6 Billion dollars in coastal projects, which benefit our citizens and state. It has been extremely effective and efficient as it is. CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different mission.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? In-Person

29. Dear Sir or Madam:

I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture and all the things we love about our state. CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different mission.

Thank you.  
Jim King  
Jim.king.jr@gmail.com

30. MAINTAIN CAPRA AS A SEPARATE ENTITY

Thank you.  
[darienc@bellsouth.net](mailto:darienc@bellsouth.net)

31. dear governor landry,

As a lifelong fisherman who has watched the birdfoot delta of Louisiana in southern Plaquemines Parish dramatically shrink year by year, I am grateful for the efforts, research and action of the Coastal Protection and Restoration Agency.

Louisiana is so fragile. We are on the leading edge of land loss and climate change, and our state's management of these vital issues is on the national and international radar....how we deal with these immense problems is being watched and scrutinized. It is important that the CPRA remain an independent agency within the Governor's Office. This makes comprehensive planning and action more straightforward and less bureaucratic than if the CPRA was folded under the Department of Energy and Natural Resources.

Please, governor, show our citizens and the country that is watching what we do, continue to support an independent agency under your office that can address the challenges of our land loss. Our very survival depends on this.

Karin Giger  
New Orleans and Venice, LA  
nolaviking@cox.net

32. I am opposed to eliminating CPRA as an independent agency. It has been so successful under four governors, creating the master plans for coastal restoration as well as executing these projects! One can't and shouldn't challenge or change this success. CPRA must remain an independent agency.

I hope this letter counts for something.

Suzanne Phelps  
suzanneawp@aol.com

33. Please note my email above is in reference to Executive Order JML-13

On Fri, Feb 16, 2024 at 5:14 PM PHYLLIS HUGG <pjhugg2017@gmail.com> wrote:

CPRA must be an independent agency. CPRA is an implementation agency that develops, oversees, and implements a scientifically based Master Plan, while DNR issues and enforces permit requirements. There is a definite conflict here that will result in a less effective and productive CPRA. Two totally and distinct missions.

Thank you,  
Phyllis Hugg  
Pjhugg2017@gmail.com



34. CPRA must be an independent agency. CPRA is an implementation agency that develops, oversees, and implements a scientifically based Master Plan, while DNR issues and enforces permit requirements. There is a definite conflict here that will result in a less effective and productive CPRA. Two totally and distinct missions.

Thank you,  
Phyllis Hugg  
Pjhugg2017@gmail.com

35. CPRA must remain an independent agency. One cannot challenge or criticize its success. A merger into DENR will lower its profile, its priority, and its effectiveness. If it ain't broke, don't fix it!

Thank you,  
David Speights  
825 Royal Street  
New Orleans, LA 70116  
504-919-8144  
504-522-8255  
Dspeights1@icloud.com

36. To Whom It May Concern,

As a lifelong resident of Louisiana, it has come to my attention that our new governor has issued an executive order calling for the independent CPRA to be placed under the Dept of Energy and Natural Resources. It is critical CPRA be an independent agency. It is because of its independence and history of projects based on science, not politics, which has made Louisiana and CPRA the recipient of millions of dollars from the BP oil spill. Our previous four governors have supported the independence of this agency and it would be a mistake to change that now.

Best regards,  
Corky Willhite  
936 Saint Peter St  
New Orleans LA 70116  
cell: 504-401-1131  
[corkyinnola@gmail.com](mailto:corkyinnola@gmail.com)

37. I am opposed to eliminating CPRA as an independent agency. It has soared under four governors, creating the master plans for coastal restoration as well as executing these projects. In 2024 this independent agency is overseeing \$1.6 Billion dollars in coastal projects, which benefit our citizens and state.

Karen Snyder  
320 N Carrollton Ave #303  
NOLA 70119  
Klsnyder299@gmail.com

38. I am opposed to eliminating CPRA as an independent agency. It has soared under four governors, creating the master plans for coastal restoration as well as executing these projects. In 2024 this independent agency is overseeing \$1.6 Billion dollars in coastal projects, which benefit our citizens and state.

Anne Robichaux  
mladybelle@hotmail.com

39. I am opposed to eliminating the CPRA as an independent agency.

[Lizreed1223@yahoo.com](mailto:Lizreed1223@yahoo.com)

40. I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture and all the things we love about our state. Every summer I get nervous about whether a hurricane will wipe us out. Insurance rates are going crazy and will only get worse if we don't address our coastal issues . I am wealthy enough to sustain this, but who will want to live here if most people cannot afford to live and work here?

CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different mission.

Julia Lennox  
1313 8th street . Nola  
Sent from Proton Mail for iOS  
Julia.lennox@pm.me

41. Please Please DO NOT eliminate CPRA for the following reasons:

1. It has soared under four governors, creating the master plans for coastal restoration as well as executing these projects. One can't challenge or criticize its success!
2. Serious legislation has occurred over the past 20 years which resulted in a single state entity able to prioritize Louisiana's coastal protection and restoration efforts in a comprehensive and principled manner. Look at what has been accomplished!
3. Not only does this dilute and diminish CPRA as a stand alone entity at the forefront of state government but DENR (Dept. of energy and natural resources) has a completely different mission, a regulatory body which issues permits.
4. It's success has been extraordinary. In 2024 this independent agency is overseeing \$1.6 Billion dollars in coastal projects, which benefit our citizens and state. If it ain't broke...what are you fixing?
5. It is because of its independence and history of projects based on science, not politics, which has made Louisiana and CPRA the recipient of millions of dollars from the BP oil spill.

Sincerely,  
Linda J. Marchand  
5406 Hewes St  
New Orleans, LA 70125  
5048124660  
Lindamarchand607@gmail.com

42. Sent from my iPad

Gov. Landry issued an executive order, calling for the independent CPRA (Coastal Protection and Restoration Authority) This is not the time for Louisiana to go backward with its effective coastal programs nor be placed in a bureaucratic quagmire.

1. I am opposed to eliminating CPRA as an independent agency. It has soared under four governors, creating the master plans for coastal restoration as well as executing these projects. One can't challenge or criticize its success!

2. CPRA must remain an independent agency. Serious legislation has occurred over the past 20 years which resulted in a single state entity able to prioritize Louisiana's coastal protection and restoration efforts in a comprehensive and principled manner. Look at what has been accomplished!

3. It is imperative CPRA remain as an independent agency. Not only does this dilute and diminish CPRA as a stand alone entity at the forefront of state government but DENR (Dept. of energy and natural resources) has a completely different mission, a regulatory body which issues permits.

4. I am opposed to eliminating CPRA as an independent agency. It's success has been extraordinary. In 2024 this independent agency is overseeing \$1.6 Billion dollars in coastal projects, which benefit our citizens and state. If it ain't broke...what are you fixing?

5. It is critical CPRA be an independent agency. It is because of its independence and history of projects based on science, not politics, which has made Louisiana and CPRA the recipient of millions of dollars from the BP oil spill.

6. I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture and all the things we love about our state.

CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different mission.

7. CPRA must be an independent agency and placing it within DENR. CPRA is an implementation agency that develops, oversees and implements a scientifically based Master Plan. DNR issues and enforces permit requirements. There is a definite conflict here which will result in a less effective and productive CPRA. Two totally and distinct missions.

Richard Foster

1424 2nd Street

New Orleans LA 70130

Rfoster32@cox.net

43. It is critical CPRA be an independent agency. It is because of its independence and history of projects based on science, not politics, which has made Louisiana and CPRA the recipient of millions of dollars from the BP oil spill.

CPRA must remain independent!!!

Margaret S Phelps

Former Chair- Citizens for 1 Greater New Orleans

Msp1161@aol.com

44. Dear Sirs:

CPRA must remain an independent agency. Serious legislation has occurred over the past 20 years which resulted in a single state entity able to prioritize Louisiana's coastal protection and restoration efforts in a comprehensive and principled manner. Look at what has been accomplished!

Best,

Dr. Edward D. Levy, Jr.

Edl8837@att.net

45. Gentlemen, I am opposed to eliminating CPRA as an independent agency. Their work has and will continue to be THE crucial element in protecting and restoring our coast. It must remain

independent, not buried in another government department. Jimmy Reiss, New Orleans  
jreiss@reisscompanies.com

46. CPRA must remain an independent agency. Serious legislation has occurred over the past 20 years which resulted in a single state entity able to prioritize Louisiana's coastal protection and restoration efforts in a comprehensive and principled manner. Look at what has been accomplished.

Melanee Usdin

New Orleans

melaneeu@icloud.com

47. Gov. Landry issued an executive order calling for the independent CPRA (Coastal Protection and Restoration Authority) to be placed under the Department of Energy and Natural Resources. I am writing in strong opposition to that order. The CPRA has a proven record of success. Much of the reason for its success is its independence. Many funders want to avoid being caught in government red tape and want to know clearly that their donation is being used as intended, with provable outcomes. This is not a role that a government agency can fulfill.

One thing we can count on is that hurricanes will hit our area. Failures to protect citizens from anticipated events will be brought to light. You can count on the fact that Louisianans, like myself, will point to this decision to take a well-functioning entity and compromise its function for no apparent reason.

I traveled with the Women of the Storm in Katrina's aftermath to Washington, D.C. Protecting our coastline is Katrina's legacy and gift to generations of Louisianians. Please ensure this vital work will continue.

Pamela Steeg

1620 State Street

New Orleans, LA 70118

(504) 875-6173

pwsteeg@gmail.com

48. I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture and all the things we love about our state.

CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different mission.

CPRA must be an independent agency and placing it within DENR. CPRA is an implementation agency that develops, oversees and implements a scientifically based Master Plan. DNR issues and enforces permit requirements. There is a definite conflict here which will result in a less effective and productive CPRA. Two totally and distinct missions.

Thank you.

Joseph Fay  
3128 Annunciation Street  
New Orleans, LA 70115  
joefaynola@gmail.com

49. Dear Sir:

CPRA must remain an independent agency. Serious legislation has occurred over the past 20 years which resulted in a single state entity able to prioritize Louisiana's coastal protection and restoration efforts in a comprehensive and principled manner. Look at what has been accomplished!

Thanks for your consideration,

Cathy Isaacson  
2400 St Charles Ave #302  
New Orleans, LA. 70130  
cwisaacson@gmail.com

50. **Stakeholder Information:**

Full Name: Tina Freeman

Louisiana Resident: Yes

E-Mail Address: teafree@me.com

Organization (if applicable): New Orleans Town Gardeners

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? EO-JML-13

How has or may it impacted you? Your organization? The protection of our Coast is vital to our continued survival

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. It is imperative CPRA remain as an independent agency. Not only does this dilute and diminish CPRA as a stand alone entity at the forefront of state government

but DENR (Dept. of energy and natural resources) has a completely different mission, a regulatory body which issues permits.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

### **Conclusion**

Why should your proposed changes be implemented? The CPRA and its autonomy is vital to the perception the State of Louisiana can properly manage the funds received.

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

### **Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

51. TWENTY YEARS HAVE CREATED A MISSION, PLAN, FUNDING, GOALS, AND EXECUTION TO COUNTER THE BIGGEST THREAT THIS STATE HAS EVER KNOWN. IT IS IMPERATIVE THAT CPRA BE MAINTAINED AS AN INDEPENDENT AGENCY. PLACING CPRA UNDER THE DEPARTMENT OF ENERGY AND NATURAL RESOURCES WOULD SEVERELY DIMINISH THE EXTRAORDINARY SUCCESS AND FUTURE OF CPRA IN FURTHERING ITS MISSION.

WHY WOULD ANY RESPONSIBLE GOVERNMENT BASE THE FUTURE OF THE STATE ON POLITICS AND NOT SCIENCE?

DEFEAT THIS MADNESS OF A EXECUTIVE ORDER.

THANK YOU FOR YOUR ATTENTION,

SHAUN DUNCAN

ssduncan@me.com

52. To Whom It May Concern:

I am writing to express my opposition to eliminating CPRA as an independent agency. Not only would this dilute and diminish the CPRA as a stand-alone entity, but it would subject its important role to a department (the Department of Energy and Natural Resources) with a completely different mission, one that could potentially contradict its own. There is no logical rationale behind this change. The CPRA has worked well under four governors and has been lauded nationally and internationally for its scientifically-informed approach, which is evident in the master plans for coastal restoration and their execution to date. Let us not tamper with what is tried and true.

Sincerely,

Ludovico Feoli, PhD.

Executive Director

Center for Inter-American Policy and Research

Tulane University

lfeoli@tulane.edu

53. I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture and all the things we love about our state.

CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different mission.

Carol Allen

New Orleans, 70130

Our lives begin to end the day we become silent about things that matter. MLK

nolacarol@gmail.com

54. I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture, and all the things we love about our state. CPRA deserves a prominent position within state government. It should not be buried within a division of a regulatory agency that has a completely different mission.

Cathy Hightower

bilcathigh@bellsouth.net

To whom it may concern:

I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture, and all the things we love about our state. CPRA deserves a prominent position within state government. It should not be buried within a division of a regulatory agency that has a completely different mission.

Thank you in advance for representing the will of people you serve.

Sincerely,

Julienne B. Vatev

jvatev@gmail.com

55. Keep the Coastal Protection and Restoration Authority (CPRA) independent. CPRA's projects have helped Louisiana and have put millions of dollars to use on scientifically important projects. Global warming is real and so are rising waters. CPRA is important to charting the survival of Louisiana's coastal economy. Political games cannot replace science.

Keith Hardie

[keithhardie@yahoo.com](mailto:keithhardie@yahoo.com)

56. I am opposed to eliminating CPRA as an independent agency. It's success has been extraordinary. In 2024 this independent agency is overseeing \$1.6 Billion dollars in coastal projects, which benefit our citizens and state. If it ain't broke...what are you fixing?

genie goldring

--

Genie Goldring

The Inner Pup | Co-Founder | VP

504-400-2818 | [gene@theinnerpup.org](mailto:gene@theinnerpup.org)

Heartworm Treatment Application

Chocolate Cake Campaign

@theinnerpup

57. I support putting CPRA in the Department of Natural Resources. That the agency is campaigning so actively to resist the move probably tells you all you need to know.

Matt Isch

Telephone: (225) 772-3014

Email: [matt@mattisch.com](mailto:matt@mattisch.com)

**58. Stakeholder Information:**

Full Name: Honora Buras

Louisiana Resident: Yes

E-Mail Address: honoraburas@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? changes to CPRA and other related entities

How has or may it impacted you? Your organization? I was an employee of DNR's Coastal Restoration Division, later OCPR, then CPRA before, during, and after creation of CPRA, from 1998-2021 and personally experienced the repercussions and disruptions of multiple reorganizations during that time period, some for the better, some worse, all being highly disruptive. The worst was the way CPRA was initially created (as OCPR) by putting DOTD engineers in charge who had no relevant knowledge or experience of our work, our employees, or the culture of the agency. It made silos worse, decreased efficiency and was a nightmare for many of the professional, dedicated civil servants involved. During the transition period, there were many issues associated with still being officially different agencies with no real HR or Accounting or IT that worked for all of us. For 3 years, I was a DNR employee working for a DOTD chain of command in a position I was not qualified for, nor did I wish to be in. It changed the culture of what had been a great, collaborative place of work and pitted employees against each other. Many of the things that were good were destroyed in the name of efficiency which was not really achieved in reality. Many silos still exist within the agency and perhaps those should be addressed first. The CPRA Board should be the place for coordination between agencies at the higher levels. Encouragement of working staff from different agencies to coordinate where appropriate is better than merging agencies. Please consider how this will work in the real world with real people. Each of the agencies and offices involved has extremely dedicated professional civil servants who will be less productive before, during and immediately after any reorganization (or rumors of one). The uncertainty and disruption will have the opposite effect from what is intended and you will lose the best and brightest if not careful. There is also a concern in changing physical locations. We were moved to a rented building that cost more than where we had been, also before the phones and computers were set up. CPRA is now on the Water Campus in a building that is already overcrowded. I was in 5 different buildings and countless internal office moves during my career. Each move had costs and serious disruptions to productivity and efficiency.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? When OCPR (later CPRA) was first formed, there were many legal and accounting issues due to contracts in



DNR's name and OCPR not having any legal authority over them. There were issues with employees' payroll and HR being in other agencies.

Does it fall under existing statutes? Regulations?

### **Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs? Eventually CPRA became a legal entity as an Office of the Governor and developed its own HR and Accounting offices, but was also internally restructured and physically moved several times, each causing issues with productivity and employee morale and retention. Every new governor or Director/Secretary felt the need to reorganize us and it rarely caused any positive changes for the work or the majority of the employees involved. However, moving CPRA back under DNR (now DENR) would be a huge mistake now that CPRA has earned international respect for the science-based planning and decision process. Although improvements to that process are always being made as new information and technology is available, it is essential that their work be based on the science of what is best for the living natural resources of the coast (lands, waters and people), free from undue industry influence and politics. Moving the Coastal Management Division from DENR to CPRA would potentially be a better move to help in that mission. We worked together well when we were under the same umbrella, keeping all coast- focused entities together.

Provide historical context and perspective.

### **Conclusion**

Why should your proposed changes be implemented? I suggest asking the affected employees (current and former) of each agency what they think is needed (or not). They are people, not names in an org chart. The professional civil servants who do the work of each agency involved know what works and what could be improved. Treat them as the professionals they are, respect their knowledge, experience and dedication, and pay them competitive wages. Newly appointed heads of agencies rarely know what is really needed, and what is already working well.

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

### **Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual, In-Person

59. Absolutely opposed to merging polluting oil industry with what should be natural resources protection agencies. This is a ridiculous short sighted agenda guaranteed to destroy our already struggling environment. Perhaps Mr Landry and his friends be required to move to New Orleans east and see how it works out for them.

Kaya Caputo  
Yuskeya7@gmail.com

60. I strongly oppose merging Louisiana Coastal Authority with other energy agencies, The Coastal Authority must remain strong and independent.

Ms. C deBen

[debengrant@hotmail.com](mailto:debengrant@hotmail.com)

**61. Stakeholder Information:**

Full Name: Linda Easterlin

Louisiana Resident: Yes

E-Mail Address: linda@easterlincomm.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? I am strongly opposed to merging the Department of Energy and Natural Resources and the Coastal Protection and Restoration Authority.

How has or may it impacted you? Your organization? Our state is at great risk of changes caused climate change and rising seas. I am impacted because I want to preserve our state and stop land loss. I am impacted because I don't want my New Orleans home to be waterfront property, or worse, lost. I want to preserve our state for my children and grandchildren.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. My historical analysis is that many in our state have played politics and control with the issue of stopping land loss. This must be stopped for the sake of our current and future citizens.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented? Every qualified expert acknowledges climate change and the risks it poses to our state. Because of this risk, the coastal agency need to stand on their own, not being merged with other departments. The problems are unique, they need unique attention. This is too important to play politics with. Use specific details to support the case. Climate change and rising seas are not a liberal hoax. They are threats to each citizen and our children and grandchildren.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

**62. Stakeholder Information:**

Full Name: Carol Wilson

Louisiana Resident: Yes

E-Mail Address: Cwilson1276@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing?

How has or may it impacted you? Your organization? Merging CPRA with our DoE and DNR that mostly deals with oil and gas licensing constitutes conflict of the interests and focus of the two groups. This would be catastrophic to the protection of our wetlands and coastal areas and communities.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

**63. Stakeholder Information:**

Full Name: Joan Lynam

Louisiana Resident:

E-Mail Address: lynam.joan@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? The need for economic development in rural areas.

How has or may it impacted you? Your organization? Farmers need ways to make more income from food crops.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? No

Does it fall under existing statutes? Regulations? No

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. Wastes from food production in Louisiana, such as rice husks, sugarcane bagasse, and cotton gin trash are frequently landfilled. They need to be converted into bioproducts. More state funding is needed to develop these techniques.

Did the program your comment concerns change over time? Did it evolve into associated programs? No

Provide historical context and perspective. N/A

**Conclusion**

Why should your proposed changes be implemented? Farmers and food processors (millers) need ways to make more income from food crops.

Use specific details to support the case. N/A

Reference relevant citations to strengthen your argument. N/A

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

64. Coastal and energy departments. Do not merge them. They have no mutual interests - not in how this state is run. Or how the energy sector works.

Views my own

Mari Kornhauser

Forgive short missive and misspelling as I am on my iPhone

Kaynine82@hotmail.com

65. **Stakeholder Information:**

Full Name: Lynda Gladney

Louisiana Resident:

E-Mail Address: lyndagladney@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Coastal protection

How has or may it impacted you? Your organization? The future of our people living in coastal areas is at risk as is the very existence of our coast. Hurricane protection, the fishing industry, land loss, recreation, flooding, shipping, tourism, quality of life & much more is impacted by the health of our coast.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? not sure

Does it fall under existing statutes? Regulations? yes

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. If we are not proactive our state/coastline will erode leaving a smaller land mass & put millions of people at risk

Did the program your comment concerns change over time? Did it evolve into associated programs? ?

Provide historical context and perspective. We are losing acres of coastline & hurricane protection every day

**Conclusion**

Why should your proposed changes be implemented? To save lives & land

Use specific details to support the case. We are losing acres of coastline every day

Reference relevant citations to strengthen your argument. n.a.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual,In-Person

66. **Stakeholder Information:**

Full Name: Joyce Dombourian

Louisiana Resident: Yes

E-Mail Address: joyce.dombourian@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? CPRA

How has or may it impacted you? Your organization? As a resident of New Orleans, I urge that the mission of the CPRA be assisted and expedited, not diminished or delayed. It is critical to stemming departures from Louisiana and to reestablishing an insurance marketplace.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? Don't know

Does it fall under existing statutes? Regulations? Don't know

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)?

67. I feel merging energy and coastal protection plan would be a mistake. These 2 user groups often have competing agendas and oil has deeper pockets. Let's not neuter coastal protection.

Sent from my iPhone

[daveandand@gmail.com](mailto:daveandand@gmail.com)

68. In reading about reorganizing a number of the agencies of Louisiana government, I object to placing the Coastal Protective and Restoration Authority within the Department of Energy and Natural Resources, which would be like a minnow swallowing a whale. CPRA is too important to the existence of our state not to retain its more visible and important position it now holds within the Office of the Governor.

Thank you,

Susan Riley Billings  
susanrileybillings@gmail.com

69. It is a horrible idea to consolidate the CPRA and DNR. CPRA plays a vital role in protecting and restoring Louisiana's coast. It has been successfully involved in projects covering hundreds of acres and millions of dollars. To fold it into another agency would downgrade the organization and add a layer of bureaucracy to bringing projects to completion. Our coast is too important.

Cathy Coates  
225 284 8312  
Baton Rouge, LA  
ccbr@att.net

**70. Stakeholder Information:**

Full Name: Brett Furr

Louisiana Resident: Yes

E-Mail Address: brett.furr@taylorporter.com

Organization (if applicable): Taylor Porter - counsel for Baton Rouge Water Works Company

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Redundancy, lack of oversight and technical expertise on the Capital Area Ground Water Commission

How has or may it impacted you? Your organization? CAGWC Assesses unconstitutional severance taxes, CAGWC has tripled those taxes in the last 3 years, has acted without any meaningful oversight whatsoever, CAGWC has attempted to confiscate BRWW's property and has refused to follow public bid law, has incurred debt without authorization and has the proceeds of its tax collections on meaningless and redundant projects that benefit no one.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? Under Constitution Art. 9, Section 1, water is a natural resource . Severance taxes are defined in Constitution Art. 7 Section 4(B) as taxes levied on natural resources at the time and place of severance. Under Article 7, Section 4(C), Political Subdivisions may not levy a sales tax. CAGWC is a political subdivision under La. R.S. 38:3072. CAGWC is levying an unconstitutional tax, disguised as a pumpage charge, based on the volume of water severed from the ground.

Does it fall under existing statutes? Regulations? La. 38:3097.1 was passed in 2003. It vested exclusive jurisdiction over all groundwater to the state (not political subdivisions) under the administration of the Commissioner of Conservation. This statute preempts and supersedes all other statutes. Nevertheless, CAGWC has continued to act as outlined above. In addition, 56 La. Adin. Code Section 707 was passed by the CAGWC purporting to unilaterally grant it the right to enter onto well owners' property and permanently set up metering and related equipment. Not even DEQ has this this right.

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. Citations are above.

Did the program your comment concerns change over time? Did it evolve into associated programs? The actions of the CAGWC have taken on a life of their own without any supervision. It has entered into contracts without obtaining approval of DNR, OC, DOA, AG and the State Bond Commission. The Commissioner of Conservation has not exercised any oversight.

Provide historical context and perspective. CAGWC was established in 1974. BRWW was involved in lobbying for its creation. Unfortunately, the way it was created as a political subdivision, it is accountable to no one.

### **Conclusion**

Why should your proposed changes be implemented? CAGWC should be brought under the jurisdiction and control of the Executive Department of the State - DNR in particular. In contrast to DNR, CAGWC has no technical expertise. The provisions of 38:3097.1 should be more fully implemented with the role of CAGWC subsumed into DNR.

Use specific details to support the case. Details outlined above. Happy to discuss more fully.

Reference relevant citations to strengthen your argument. Citations are above.

### **Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? In-Person

## 71. Stakeholder Information:

Full Name: Matthew Roe

Louisiana Resident: Yes

E-Mail Address: r.matthew.roe@gmail.com

Organization (if applicable): it is not applicable

### **Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Consolidation of CPRA into DENR

How has or may it impacted you? Your organization? That is not applicable.

### **Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? I'm not a lawyer, so I don't know. However, rolling CPRA and Louisiana Oil Spill Coordinantor's Office under DENR seems like an ethical issue. There is going to be major conflicts of interest as these three departments work toward different goals, but if combined it seems like the oil and gas industries would be given priority over coastal restoration projects and especially reports and response to oil spills. But the real problem is that so many of the coastal problems stem from the oil and gas industry. Everything would be at odds and we all know, you know --I know, that big money from oil and gas is going to get their way. And for the love of god, the coast needs restoration. Wetlands and barrier islands slow down and reduce damage from hurricanes.

Does it fall under existing statutes? Regulations? I don't know.

### **Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. No, this is a public comment -- a comment from the public. I do not need to include citations.

Did the program your comment concerns change over time? Did it evolve into associated programs? Well, I hope it doesn't.

Provide historical context and perspective. Just an FYI, your public comment form sucks.

### **Conclusion**

Why should your proposed changes be implemented? I'm not the one wanting change, you are. Why should your proposed changes be implemented? Will there be oversight to guarantee there will be no conflicts of interest? How will you reconcile the oil and gas industry vs climate change and the need for coastal projects because hurricanes are getting stronger due to climate change.

Use specific details to support the case. You, use specific details to support the case.

Reference relevant citations to strengthen your argument. You, reference relevant citations to strengthen your argument.

### **Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? No

72. Thank you for the opportunity to comment. In the words of almost everyone's dad at some point in their lives: "if it ain't broke, don't fix it." This is true of many, many things, and it's certainly true of Louisiana's Coastal Protection and Restoration Authority.

After six years of working for this organization, I can vouch firsthand for the top-notch level of professionalism and quality of work that Team Coastal provides to the citizens of Louisiana. In a state that consistently struggles to retain its best and brightest, here you have an institution that is a destination for engineers, scientists, and other professionals who want to contribute to the greater good. I came to Louisiana as a graduate student at LSU hoping to learn more about wetland ecosystems and planning to continue my career elsewhere. But instead I found myself with a highly engaging, good-paying job in my career field, so I stayed in Baton Rouge, made friends here, and started a family. CPRA is a success story.

I can appreciate the new administration's interest in improving the functionality of state government; my advice would be to stand up CPRA as an example of a state institution that is working well, and ask yourselves how to emulate this success in other agencies.

- April Newman
- H2ohmm@gmail.com

73. **Stakeholder Information:**

Full Name: Rebecca Ann Harmon

Louisiana Resident: Yes

E-Mail Address: rebeccaaharmon@yahoo.com

Organization (if applicable):

### **Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Coastal preservation should not be merged with energy division! More work for already stretched thin divisions of the State Employees!!!

How has or may it impacted you? Your organization?

### **Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?



Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. As a State employee, it feels like we are a the dumping ground to do more work than is possible for an employee in a 40 hour work week.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? No

74. It was of interest to me that your request for comments to consolidate a number of agencies was published in NO Times Picayune the same day that a report was published verifying that the Calcasieu was the 2nd most polluted river in North America. It was determined that industrial waste and plant discharges were responsible.

Consolidation of agencies is not an answer to Louisiana's reputation as a polluted state that caters only to the polluters with favorable legislation and oversight.

Mark me down as opposed to any consolidation that is being considered by your administration.

With kind regards,

Frank McStravick

Citizen of Louisiana

[fwillsmay@gmail.com](mailto:fwillsmay@gmail.com)

75. **Stakeholder Information:**

Full Name: Aaron Giambattista

Louisiana Resident: Yes

E-Mail Address: agiamba@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Do not consolidate the CRPA

How has or may it impacted you? Your organization? it's protecting louisiana

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? who cares, youre gonna do it anyways

Does it fall under existing statutes? Regulations? who cares, youre gonna do it anyways

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. we're losing a lot of land!

Did the program your comment concerns change over time? Did it evolve into associated programs? yes

Provide historical context and perspective. no

**Conclusion**

Why should your proposed changes be implemented? leave it be

Use specific details to support the case. no

Reference relevant citations to strengthen your argument. no

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual,In-Person

76. I don't agree with consolidating the state Coastal Protection and Restoration Authority and several other agencies with the Department of Energy and Natural Resources.

This would make environmental issues below the goals of the energy department.

We have a history of the energy industry hurting our environment. Thousands of leaking orphaned wells and thousands of miles of abandoned service canals are prime examples.

Separate agencies give us a better chance of preventing future problems.

Sent from my iPhone

Paul LaCoste

[paulacoste@gmail.com](mailto:paulacoste@gmail.com)

77. Secretary Tyler Gray,

I wholeheartedly support the governor's initiative to merge departments, and eliminate some boards & commissions. This initiative will result in cost-saving efficiencies and better service to the people of Louisiana. If the need exists, I am willing to serve as an un-paid volunteer to progress the initiative.

The newspaper article specifically references Capital Area Groundwater Conservation District and the Water Resource Commission. My education/training/expertise overlaps these 2 particular bodies, and I have attended meetings and even served as a Commissioner on CAGCD before resigning. I don't believe either of these are able to serve their original publicly stated purposes, and could be readily integrated into an existing state agency(s) and better serve Louisiana.

I further suggest consideration of merging LaDEQ and LaDNR, in particular those areas of overlapping and sometimes conflicting regulatory efforts.

Please do not hesitate to contact me if I can be of any assistance regarding this initiative; I welcome the opportunity to assist -

Scott M. Bergeron, P.E., P.G. (Louisiana)

[s Bergeron@envirodepot.com](mailto:s Bergeron@envirodepot.com)

78. I have the same concerns I always have regarding corporate mentality. The combining of protection agencies with the oil business is unsettling to me because the oil business is a bully with slippery morals.

The concern is that corporations are hardly manageable. Sometimes things more important than money and power fall pray, slowly and relentlessly thru the courts and the greed of humanity.

We must be extremely careful that we do not further corrupt this globe. People create garbage out of beauty without reminders from controls.

Thank you Jane Orr

[Janeorr5@gmail.com](mailto:Janeorr5@gmail.com)

79. I want to express my opposition to consolidation of CPRA with other state agencies. It has been an absolute delight to work with a state agency that can act swiftly and directly based on good science and local input. It is impossible to see how merging with other agencies, and supervisors in particular, would make this agency more nimble, cost effective, or creative. It would NOT.

If Governor Landry is opposed to government bureaucrats responding like government bureaucrats, please ask him to listen to all of the state agencies with experience working with CPRA.

I applaud his appointment of Glenn Ledet as Executive Director in particular. Glenn is a steady hand and clear thinker. He is a great engineer and scientist.

Stanford A. Owen, MD

Commissioner, St. Tammany Parish Levee Drainage and Conservation District

[drowenmd@icloud.com](mailto:drowenmd@icloud.com)

80. Consolidating the state Coastal Protection and Restoration Authority within the Department of Energy and Natural Resources would be an unmitigated disaster for Louisiana, removing an executive check on oil and gas companies that is critical to keeping this state, its coasts, and its seafood healthy for our grandchildren. Conservatism demands conservation. I urge you not to advance this scheme.

Chris Caterine

5124 Laurel St, New Orleans, LA 70115

[clcaterine@gmail.com](mailto:clcaterine@gmail.com)

81. An absolutely terrible idea. Don't do it.

Peter Derbes

[pderbes@gmail.com](mailto:pderbes@gmail.com)

82. **Stakeholder Information:**

Full Name: Mark Francis Marley

Louisiana Resident: Yes

E-Mail Address: markswimmarley@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Governor Landry's obvious fealty to the petrochemical industry, his willful lack of concern regarding damage to the environment and the carbon caused climate crisis, and his loyalty to former President Trump, a sociopath and wannabe dictator, warrant suspicion of anything he proposes.

How has or may it impacted you? Your organization? Landry's climate crisis enabling endangers Earth's ecosystems and every living thing on Earth.

### **Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

### **Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. Landry has said that global warming is a hoax . That statement is a blatant lie.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

### **Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

### **Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? In-Person

83. If we're going to reorganize CPRA--let's consider 3 points.

Let's start by all acknowledging that the two terms "coastal protection" and "coastal restoration" are really misnomers and thus misleading as missions for organizing two critical AND DISTINCT state efforts.

1. There is no such thing as "protecting" anyone from coastal flooding; the only thing possible is some practical degree of "coastal flood risk reduction"—for some communities.

- Hence the Corps' use of the term "risk reduction" in renaming of the New Orleans regional levee system and in the title of studies for flood mitigation projects.

- As is becoming more PAINFULLY OBVIOUS every year, the true value of any investment in flood risk reduction (riverine and coastal) must be measured in terms of controlling the escalating actuarial cost of flood insurance.

2. There is also no such thing as "restoring" Louisiana's coast; the only thing possible is some practical degree of "coastal ecosystem enhancement"—for some areas.

- The real goal is not "land" per se, but functional habitat; and crucially, counter to much misinformation, projects for wetland creation, barrier island nourishment, diversions, etc. have negligible "bankable" coastal flood risk reduction benefit.

- The true value of any investment for this goal must be measured in terms of long-term ecosystem productivity according to key fish and wildlife indicator species.

Thus,

3. We need two distinct agencies with all the proper authority AND POLITICAL SUPPORT necessary to focus on the two distinct and critical priorities of "flood risk reduction" and "ecosystem enhancement" for our coast.

- Wherever it's housed, an agency focused on coastal flood risk reduction should

- be part of a dedicated statewide riverine and coastal flood risk reduction agency; and

☒ closely coordinate with agencies focused on other waterbody infrastructure projects, use, and regulation (DOTD, DEQ, DNR) as well as on storm disaster preparedness, response, and recovery (GOHSEP and OCD).

- Wherever it's housed, an agency focused on coastal ecosystem enhancement should ☒ be part of a dedicated statewide upland, wetland, and coastal ecosystem enhancement agency; and

☒ closely coordinate with the agencies focused on commercial/recreational use of eco-resources, and water use and quality, (DWF, DNR, and DEQ).

- Both statewide agencies should be professionally staffed and funded to get the most statewide bang on their respective missions for the taxpayer's dollar.

If we can all agree on these three points, we'll be much more likely to succeed at reasonable goals for our coast!

Some of you will recognize these points from my missives over the past years!



Cheers.

Bob

I periodically bcc emails on Louisiana coastal and flood risk issues to a list of over 800 folks. Please don't hesitate to let me know if you do not want to receive these emails.

Bob Jacobsen PE

Environmental, Coastal, & Flood Hydrology

Bob Jacobsen PE, LLC

7504 Menlo Drive

Baton Rouge, LA 70808

225.678.2414

[www.bobjacobsenpe.com](http://www.bobjacobsenpe.com)

[bobjacobsenpe@gmail.com](mailto:bobjacobsenpe@gmail.com)

84. The proposal to consolidate the Coastal Protection & Restoration Authority with the Department of Energy and Natural Resources is incredibly ill-founded, insane, and possibly evil. The two entities are in a natural conflict with each other. They can never be on the same team as they have opposite goals and supporters. If this meant as a joke, this newly elected governor is NOT funny. It almost appears to be indicative of vast ignorance on Mr. Landry's part or an early attempt to abuse his power. Or both.

Roslyn Elfer

[roslynelfer@gmail.com](mailto:roslynelfer@gmail.com)

85. I am opposed to the consolidation because it reduces the seriousness of climate change.

Kenneth Mitchell

[Kennethmitchell1140@gmail.com](mailto:Kennethmitchell1140@gmail.com)

86. See story

Angela deGravelles

[prpro@eatel.net](mailto:prpro@eatel.net)

87. Please leave CPRA alone. They do excellent work. I have seen it first hand in Plaquemines Parish. I know nothing about the politics of the agency but I do know that they work hard at restoring the coastline. Thanks for listening.

Jak Kunstler.

Written stream of consciousness with no regard for punctuation or grammar.

[jak@knsworks.com](mailto:jak@knsworks.com)

88. The proposed merger is going in the wrong direction. The intent may be to save money, but saving money won't matter much if we vitiate efforts to save our coastline. News reports say that CPRA's staff will be reduced, a clear indication that the move is designed to lessen the impact of the CPRA. Moreover, the CPRA is no friend of the energy companies that have contributed to the decimation of our coastline. The merger doesn't just place the fox in the chicken coop; it puts him in charge of it. There are many factors that are causing the erosion of our coast. The fixed channeling of the river over the past century may be at the top of the list. But to be in denial of the role that the oil and gas industry has played is just a self-serving maneuver for political support from the state's richest, most powerful players. It's craven politics, pure and simple. It reflects a complete lack of concern for the long term well being of Louisiana.

Scott Howard

Sent from my iPad

[scottphoward@gmail.com](mailto:scottphoward@gmail.com)

89. Absolutely consolidate. We taxpayers are tired of higher taxes for agencies that do the same jobs!!!!!!

When you finish that please continue with other agencies with the rest of the state government.

Lastly we working class need tax breaks once there is savings.

Thank you Jeff Landry

Nicea Barry

6735 Riverside Dr

Harahan, LA. 70123

504.376.7658

[Nicea.barry@yahoo.com](mailto:Nicea.barry@yahoo.com)

90. I'm begging you to not mess with CPRA. They are one of the most effective governmental entities we have and they need to stay that way if we want to have a future in this state

Coryell Kelsey

[koryellkelsey@icloud.com](mailto:koryellkelsey@icloud.com)

91. Full Name: Karen L Stephens

Louisiana Resident: Yes

E-Mail Address: [legislady@hotmail.com](mailto:legislady@hotmail.com)

Organization (if applicable): --None--

Comments TERRIBLE IDEA TO RE-ORG CPRA!

92. Dear Mr. Landry,

I am writing today in opposition to the proposal to merge DENR and CPRA. As a former employee of DENR division Office of Coastal Management, I believe this will politicize future restoration and drainage improvement projects such as Mid-Breton Sediment diversion causing further delays in already arduous process to receive a permit. This is not something anyone wants. DENR OCM is one of the best Coastal programs in the country. Louisiana tax payers are not footing the bill for federally funded project for Coastal Restoration. Those funds are provided by Congress and distributed through NOAA. So this plan doesn't have merit to saving taxpayers money. If anything there are sections with DNR, such as pipeline division, conservation and OCM surveillance & Enforcement which are defunct sections. These sections being reallocated like oil spill going to DOA would be more better suited for being blanketed into CPRA so they can be run without political influence. As the program is currently run, they allow for numerous local Coastal program agencies commit violation after violation without recourse. Penalties alone and actually being enforced under CPRA authority alone could cover the loss to Taxpayers. However, Terrebonne, Lafourche and Plaquemines get away time and time again undermining federal Master Plan projects. So not sure anything will help. Case in point Terrebonne consolidated levee district building levees and digging borrow pits in front of Morganza to the Gulf Levee System. A federally funded project How will this make anything better? The system works but there are far too many middle managers and subsections that interfere with the agencies ability to be effective. If you would like to discuss further on the shortcomings of both DENR & CPRA and want a real solution to fix it please reach out to me.

b-rad joseph

[bradleyhester0@gmail.com](mailto:bradleyhester0@gmail.com)

93. As a science teacher I have been to many workshops about wetlands at LUMCON at Cocodrie, the 4-H camp at Wildlife and Fisheries camp in Woolworth, state science convention in New Orleans, and many locations in Terrebonne Parish.

Learning to protect our wetlands

and our abundant seafood and game animals was part of our curriculum and they are also important to our local economy.

Many of my 7th grade students are in the oilfield now as was my husband for 37 years with Texaco and Chevron.

But my former students actually work in North Dakota, Pennsylvania, Texas, and New Mexico. Don't destroy our seafood industry to chase oilfield jobs that have gone to onshore fracking locations out of state.

P.S. You now have a doctor running the state treasury department and another doctor running the Wildlife and Fisheries departments.

Why?

Taking coastal restoration money which has been incredibly successful in helping our coastal parishes and giving it to Energy department and oilfield companies Would be foolish.

No, do not combine coastal resources with energy department.

BTW \$3 million to send Louisiana national guard troops to Texas border so you can kiss up to Trump instead of fixing our roads before New Orleans Super Bowl is dumb... Kind of like things Bobby Jindal did before he became known as one of our worst governors ever.

Thank you for your time,

Annette LeBouef

Terrebonne Parish

Sent from my iPad

[lebouefannette@gmail.com](mailto:lebouefannette@gmail.com)

94. First Name Brian

Last Name Brining

E-Mail Address Damndragon@aol.com

Business/Organization None

Comments I think combining the coastal and Energy boards is a mistake and in the end will cost us more than having two separate boards. I can conflict on what their priorities will be. I'm all for drilling but not at the cost of loosing more of our coast. One board needs to be completely focused on our coast and combing them will water that down and slow it down. I see the effects of loosing our coast daily. I'm on the water daily. I hope you consider my comments as they are meant. Constructive. Thank you sir.

95. **Stakeholder Information:**

Full Name: Linda Kocher

Louisiana Resident: Yes

E-Mail Address: lindabkocher@gmail.com

Organization (if applicable): Not applicable

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Reduction in the number of board members and advisors at the Coastal Protection and Restoration Authority (CPRA) after consolidating CPRA under the LA Dep't. of Energy and Natural Resources

How has or may it impacted you? Your organization? This would certainly have a negative impact on the coast, and thereby the entire state, by having fewer experts having input on our coastal problems.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?



Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? No

96. **Stakeholder Information:**

Full Name: Bonnie Bess Wood

Louisiana Resident: Yes

E-Mail Address: beebeewood@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing?

How has or may it impacted you? Your organization? There is no reason to consolidate the Coastal Protection and Restoration Authority (CPRA) underneath the Louisiana Department of Energy and Natural Resources. And reducing the number of board members and advisors at the CPRA is not justified. Neither of these measures is beneficial. If it ain't broke, don't try to fix it!

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)?

97. Mr Gray,

I believe that the attempt to essentially terminate the CPRA by merging it with the DENR is simply an act of political corruption driven by a desire to weaken any environmental initiatives in our state and siphon funds that are earmarked for coastal restoration. The CPRA needs to remain independent of political hijinx. Our homes and lives are at stake. Congress has mandated the creation of the CPRA precisely to do the emergency work of protecting our coast and to keep it free of the negative influences of special interest groups like oil and gas. Those politicians who have sold the people's power over to these private interests will be prosecuted, in due time. We are familiar with this game. I implore you to keep this one decent initiative free of corruption. Let the CPRA continue its work.

Furthermore, this process needs a study done to prove that this change would be beneficial to Congress' mandate to protect the coast, and there needs to be opportunity for public vote.

Ray Jackson

940 Desire St.

New Orleans, La 70117

offroadmoose@yahoo.com

98. To whom it may concern,

I am writing to express my dismay over the proposal to consolidate the state's Coastal Protection and Restoration Authority into the Department of Energy and Natural Resources. While I understand the desire to streamline the state government, the roles of the CPRA do not overlap and potentially conflict with those of the Department of Energy and Natural Resources. The Louisiana coast is more than a source of energy and natural resources; it is the home of many Louisianans. Those constituents have already lost land, lives and property and deserve protection. I urge you to consider these points:

1. The CPRA must remain an independent agency. The current structure is working to keep us safe from storms and protect our people and economy.
2. The current structure keeps politics out of decision-making about what is best for our state's coastal program.
3. The state's coastal program has created thousands of jobs. For this reason and others, coastal restoration is strongly supported by voters across the state and has earned virtually unanimous support across multiple administrations and Legislatures.
4. There is a serious risk of unanticipated consequences that could slow down the implementation of critical projects and threaten funding needed to build them.
5. More time must be devoted to studying the effects of any significant changes such as this. The administration also should be clear about the reasons for any proposed change and consider their validity. For example, is folding CPRA into DENR intended to help the state implement projects faster?
6. Public input is critical to this process.

Sincerely,

Kathe Managan

Kathe Managan, PhD

Instructor, Linguistic Anthropology

University of Louisiana at Lafayette

email: [kathe.managan1@louisiana.edu](mailto:kathe.managan1@louisiana.edu)

<https://louisiana.academia.edu/KatheManagan>

99. **Stakeholder Information:**

Full Name: Kris Rice

Louisiana Resident: Yes

E-Mail Address: [iloveoctober88@yahoo.com](mailto:iloveoctober88@yahoo.com)

Organization (if applicable):

Make a Case for Change:

Identify the Issue

What is the specific issue you are addressing? Executive Order JML-13

How has or may it impacted you? Your organization? Yes

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? Yes

Does it fall under existing statutes? Regulations? Yes

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. NO TO Executive Order JML-13

Did the program your comment concerns change over time? Did it evolve into associated programs? NO

Provide historical context and perspective. NO TO Executive Order JML-13

**Conclusion**

Why should your proposed changes be implemented? NO TO Executive Order JML-13

Use specific details to support the case. NO TO Executive Order JML-13

Reference relevant citations to strengthen your argument. NO TO Executive Order JML-13

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual, In-Person

100. **Stakeholder Information:**

Full Name: Mary E; Gehman

Louisiana Resident: Yes

E-Mail Address: megehmanb@bellsouth.net

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? JML-13 (executive order)

How has or may it impacted you? Your organization? Folding the Coastal Protection and Restoration Authority into the La. Dept. of Energy and Natural Resources and reducing thereby the number of CPRA board members and advisors will mean less information and studies by the CPRA made available to the community. It will also reduce the current amount of information regarding coastal restoration issues from experts in their fields from which the CPRA draws its reports to the public. Why make this change when the CPRA members serve without pay? How does reducing their number and impact help the state of Louisiana? I can see no gain for us citizens who deal with coastal erosion and its profound effects -- so why do it?! We need all the expert advice and information we can get. I have been a victim of both hurricanes Katrina and Ida, having to spend lots of money beyond what homeowners' insurance paid me for repairs. In fact, the ever-increasing ferocity of hurricanes and tropical storms on our coastal region, due in part to loss of buffer wetlands, has raised our insurance rates to a point where some of us have to sell our homes or go without coverage. That hits us all very personally! We have to be doing more -- not less -- to address that!

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? It is a legal one in that it means the state has to sue the insurance companies when they fail to pay for repairs from

storms, also when insurance companies leave the state and do not address the personal suits against them filed by their clients who were not compensated properly.

Does it fall under existing statutes? Regulations? No.

### **Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs? Not that I know of.

Provide historical context and perspective. See my initial message above

### **Conclusion**

Why should your proposed changes be implemented? See my initial comments above

Use specific details to support the case. See my initial comments above

Reference relevant citations to strengthen your argument. See my initial comments above

### **Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

101. Hello-

I'm writing to express my concerns about the CPRA reorganization discussions occurring. Coastal restoration and protection is a key function of state government and has been strongly and consistently supported by Louisiana's citizens for many years. Keeping the agency as apolitical as possible is the best way for it to execute on its mission and preserve and protect our coast. I encourage the governor and other stakeholders to prioritize CPRA's independence and not take any action to slow down its momentum on the many real projects that are producing tangible results.

Thanks for your time.

John Morello

john@morello.net

mobile / text: 1.225.229.3810

19419 N Trent Jones Dr

Baton Rouge, LA 70810

102. **Stakeholder Information:**

Full Name: Christine L. Day

Louisiana Resident: Yes

E-Mail Address: chrisday0829@gmail.com

Organization (if applicable):

### **Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? The proposed consolidation of the Coastal Protection and Restoration Authority into the Department of Energy and Natural Resources, which is a TERRIBLE idea.

How has or may it impacted you? Your organization? Land loss, especially wetlands loss, impacts me as a Louisiana resident. Not only is much of our coastal land area disappearing

where people live, work, and enjoy recreation; much of that land protects our city and other areas from more devastating hurricane damage.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective. 98% of climate scientists, as well as virtually all national and international scientific associations, agree that climate change is a major contributor to Louisiana's land loss. Use of fossil fuels is a major contributor to climate change. In addition, lawsuits brought by Louisiana regional governments charge that oil companies have not fulfilled their contractual obligations to repair the damage done by their dredging and drilling, adding further to our land loss. Governor Landry has never made a secret of his support for the fossil fuel industry. I have no problem with supporting this major sector of our economy, but it is not properly balanced with concern and action on behalf of our environment, and in particular our coast. Already the governor has appointed numerous fossil fuel company executives to important state environmental leadership positions (for example at DENR, DEQ, and the Governor's Advisory Commission on Coastal Protection), and in the past had referred to climate change as a "hoax." (I recognize that he surely must be familiar with the scientific consensus by now though.)

**Conclusion**

Why should your proposed changes be implemented? I am afraid that moving CPRA into DENR will slow and subjugate coastal restoration efforts to oil and gas (fossil fuels) interests--in particular their short-term profits, at the expense of longer-term coastal restoration and protection, which includes protection from increasingly strong hurricanes. PLEASE don't do it! Please allow CPRA the authority, autonomy, and resources it needs to work on vital coastal issues.

Use specific details to support the case.

Reference relevant citations to strengthen your argument. See the recently published study of coastal land loss by three Tulane University researchers, referenced in this article: [https://www.nola.com/news/environment/new-study-sees-the-sobering-future-of-louisianas-coast/article\\_2a27f818-cb7d-11ee-a5b0-736ab3036500.html](https://www.nola.com/news/environment/new-study-sees-the-sobering-future-of-louisianas-coast/article_2a27f818-cb7d-11ee-a5b0-736ab3036500.html). The projections based on their findings are frightening, but they also emphasize that it is not too late to slow and remediate land loss! The future economic, cultural, and recreational assets--their very survival--depend on it.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)?

103. **Stakeholder Information:**

Full Name: Alexander A. Bernhard

Louisiana Resident: No

E-Mail Address: aabernhard@comcast.net

Organization (if applicable): WilmerHale LLP (retired)

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Reduction in number of Board members of CPRA

How has or may it impacted you? Your organization? Born in NO and intended to come back to get buried there and want some coast line left to protect my grave.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? no

Does it fall under existing statutes? Regulations? yes

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

104. Governor Landry i thought it was a republican mandate that government should stay out of the everyday lives of the people but since your short term in office all you have done is meddle and in a negative way i might add slow down catch your breath stop being reactive and come up with a plan to govern and not rule...please thank you  
J Spears  
[Joeby12@gmail.com](mailto:Joeby12@gmail.com)

105. **Stakeholder Information:**

Full Name: Mary Hannon

Louisiana Resident: No

E-Mail Address: dhannon@bellsouth.net

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? CPRA Board

How has or may it impacted you? Your organization?

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented? Please do not reduce and consolidate the CPRA Board. This is unnecessary, and the members are not compensated.

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

106. Dear Secretary Gray,

With children and grandchildren in New Orleans and siblings, nieces, nephews and hundreds of cousins throughout Terrebonne and Lafourche Parishes and as a member of the Coalition to Restore Coastal Louisiana and a member of the Coastal Advisory Council we have long standing interest in the protection and restoration of Louisiana's coastal wetlands and barrier islands. These play crucial roles in storm protection, navigation, oil and gas production and seafood. And all of this is threatened by subsidence, erosion and sea-level rise. There are few issues more important to the future of Louisiana.

The proposal to fold the CPRA into DNR is, absolutely, a step in the wrong direction. Under CPRA, Louisiana has led the country in science-based coastal protection and restoration projects that focus on the long term survival of our coast and the people who live and work there.

DNR has a different mission within a shorter time frame. The two agencies should not be combined and to do so would be extremely short sighted. It would send a clear message to the citizens of Louisiana and the country that short-term interests are more important than the long-term survival of our coastal wetlands and barrier islands and all of the benefits they bring.

We urge you to leave CPRA as a separate, independent authority.

Sincerely,

Robert and Carolyn Gorman

Robert D. Gorman

rdfgorman@gmail.com

(985) 805-0372

107. **Stakeholder Information:**

Full Name: Lauralee Perez

Louisiana Resident: Yes

E-Mail Address: laura@perezweb.net

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Combining CPRA and DENR under one office  
How has or may it impacted you? Your organization? This move would have an effect on everyone in Louisiana. CPRA should remain separate as it is essential for our state's protection from coastal erosion and emergency response to catastrophic natural disasters. The mission of these 2 entities are completely separate and parallel, not much overlap.

#### **Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? That is not within my knowledge base.

Does it fall under existing statutes? Regulations? I do not know.

#### **Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. I am not interested in doing research but I am positive that such is readily available to you.

Did the program your comment concerns change over time? Did it evolve into associated programs? Same.

Provide historical context and perspective. Same.

#### **Conclusion**

Why should your proposed changes be implemented? I do not want to make a proposal for change! I want to leave these 2 as they stand. CPRA has had a tremendous impact on our success at mitigating damage. Combining these 2 entities would be a step backward for our state! This question should read "why should our proposed changes be implemented!" You have not shown me any valid reason to do so especially these professional committee members with expertise in their respective fields are not being paid!

Use specific details to support the case. I have no specifics at hand.

Reference relevant citations to strengthen your argument. Same. (I would like to comment that this "public comment portal" is not user-friendly! If you are seeking input from the general public citizenry who have informed themselves on the topics, why would we be expected to give detailed history, laws, citations, and background here? I wish to express my own opinion as an educator who is interested in the ecology of our state.)

#### **Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

#### 108. **Stakeholder Information:**

Full Name: Marsha Walley

Louisiana Resident: Yes

E-Mail Address: Mnwalley@hotmail.com

Organization (if applicable):

#### **Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Consolidating and reducing the number of board members on the Coastal Protection and Restoration Authority

How has or may it impacted you? Your organization? It will impact the coastal issues around southern Louisiana where I have a home and will reduce the maximum amount of protection and professional input to avoid another disaster like the federal levy failure of 2005.



**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? Yes

Does it fall under existing statutes? Regulations? Yes

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. Governor Jeff Landry is working to consolidate the coastal protection and restoration authority underneath the Louisiana Department of energy and natural resources. I see no plausible reason that this merger is needed. In addition, he also seeks to reduce the number of board members and advisors at this authority. Many of those on those boards receive no compensation and therefore I see no reason to reduce the valuable input from credentialed experts especially if they are not compensated.

Did the program your comment concerns change over time? Did it evolve into associated programs? No

Provide historical context and perspective. Governor Jeff Landry is working to consolidate the coastal protection and restoration authority underneath the Louisiana Department of energy and natural resources. I see no plausible reason that this merger is needed. In addition, he also seeks to reduce the number of board members and advisors at this authority. Many of those on those boards receive no compensation and therefore I see no reason to reduce the valuable input from credentialed experts especially if they are not compensated.

**Conclusion**

Why should your proposed changes be implemented? To provide the maximum possible ability to protect Louisiana

Use specific details to support the case. Governor Jeff Landry is working to consolidate the coastal protection and restoration authority underneath the Louisiana Department of energy and natural resources. I see no plausible reason that this merger is needed. In addition, he also seeks to reduce the number of board members and advisors at this authority. Many of those on those boards receive no compensation and therefore I see no reason to reduce the valuable input from credentialed experts especially if they are not compensated.

Reference relevant citations to strengthen your argument. None

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? No

**109. Stakeholder Information:**

Full Name: Hirschel T. Abbott, Jr.

Louisiana Resident: Yes

E-Mail Address: habbott@stonepigman.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Opposition to consolidation of the CPRA into the Department of Energy and Natural Resources

How has or may it impacted you? Your organization? This will diminish the expertise and functionality of the CPRA and serves no valid purpose.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented? The proposed consolidation should NOT be implemented. The CPRA serves a very valid and important benefit related to coastal protection and should not be subservient to the Department of Energy and Natural Resources.

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

110. **Stakeholder Information:**

Full Name: Denise L Paddock

Louisiana Resident: Yes

E-Mail Address: paddockdl@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Placing the Coastal Protection and Restoration Authority (CPRA) underneath the Louisiana Department of Energy and Natural Resources

How has or may it impacted you? Your organization? I live in New Orleans, survived the long rebuild of our city along with many others after the failure of the levees. I have read the science that shows the rapidly eroding coastline. I expect those who govern our state to ensure safety of its people, including proper and thorough oversight to reduce coastal erosion. I also expect them to look to science to guide us.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. There is no plausible reason that this merger is needed and certainly we need properly credentialed board members. No member of either board even receives any form of compensation. Even some conservative voices have protested that this move is counter to what our state should be doing. We should be strengthening the CPRA, not weakening it.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective. We have had several hurricanes within the last 20 years that show us that our vanishing land and barrier islands increases our chances of devastating storms. This is not just some idle thinking or belief. There is abundant science that shows what is happening to our land and the effects of a violent storm meeting an eroding coastline and rising waters. The CPRA was formed to work to solve the threat this presents.

**Conclusion**

Why should your proposed changes be implemented? We need to keep a strong CPRA in place to ensure the safety of Louisiana citizens, to ensure that there is even a Louisiana for future for people to live in.

Use specific details to support the case. I live here. I survived Katrina in 2005 and endured subsequent hurricanes and also seen the devastation to other Louisiana areas resulting from increasingly strong storms. I would like to know that my state government cares about me and others.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

111. **Stakeholder Information:**

Full Name: Julie Schwam Harris

Louisiana Resident: Yes

E-Mail Address: julieschwamh@gmail.com

Organization (if applicable): Citizen Advocate

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? I oppose putting the CPRA under the Department of Energy and Natural Resources.

How has or may it impacted you? Your organization? The CPRA has to do what it needs to do to save Louisiana from washing away. It needs to be high profile and not buried under an administrative department that works with interests that are the opposite of Coastal Restoration.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented? I am proposing a status quo that works. The change being proposed is damaging to the goal.

Use specific details to support the case.

Reference relevant citations to strengthen your argument. I am a citizen who has followed the washing away of our state due to negligent policies at the state and federal level. I am 71 years old and want the state to be here for the future. You should be doing what will preserve it, not further endanger it.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

112. **Stakeholder Information:**

Full Name: Susan G. Guidry

Louisiana Resident: Yes

E-Mail Address: susanguidrynola@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Governor's proposal to move CRPA under DENR, and related consolidations that would shift focus and resources away from coastal preservation and restoration and would promote more destructive oil and gas activity.

How has or may it impacted you? Your organization? We are losing our coastal areas faster than anywhere in the world. Coastal preservation and restoration must supersede government subsidizing big oil.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective. CPRA was created after Hurricane Katrina and the failure of our federal levee system. It has been hugely successful and attracted enormous amounts of funding, created thousands of jobs and has a voluntary board of professionals with needed expertise.

**Conclusion**

Why should your proposed changes be implemented? I do not want the proposed changes. The governor wants them to consolidate his power in this area.

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

113. I am writing to urge that CPRA remain an independent agency. It is because of its independence and history of projects based on science, not politics, which enabled Louisiana and CPRA to become the recipient of millions of dollars from the BP oil spill.

Our land loss crisis is an existential crisis. It impacts our way of life, our culture and all the things we love about Louisiana.

CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different mission.

Thank you.

Nathan Chapman

715 Ursulines

New Orleans, LA 70116

[nathanechapman@gmail.com](mailto:nathanechapman@gmail.com)

114. I am strongly opposed to moving CPRA under the Dept of Energy & Natural Resources. The Dept of Energy & Natural Resources has an entirely different mission - one that promotes the interests of the energy and petrochemical industries. These industries have been a strong contributor to the damage that CPRA is trying to correct. As a master naturalist in this state, I am keenly aware of the work that has been accomplished by CPRA. To roll it under a government department will expose CPRA to unnecessary political influences and roadblocks, causing it to compete for state and federal dollars with pro-energy interests that do not acknowledge proven science regarding climate change. It is imperative that CPRA remain an independent organization.

Sincerely,

Deanna Lyons

[ellumbee@gmail.com](mailto:ellumbee@gmail.com)

New Orleans, LA

115. **Stakeholder Information:**

Full Name: Leonardo Culotta

Louisiana Resident: Yes

E-Mail Address: [lculotta@aol.com](mailto:lculotta@aol.com)

Organization (if applicable): Mr.

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Reduction in the number of personnel on the Coastal Protection and Restoration Authority. I understand that the members are not paid, so there is no monetary reason for any reduction.

How has or may it impacted you? Your organization?

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? No

116. **Stakeholder Information:**

Full Name: Sam Stout

Louisiana Resident: Yes

E-Mail Address: sam4nfriends@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Landry's desecration of the governor's office and his destructive neo-fascist agenda

How has or may it impacted you? Your organization? Has led us to seriously consider leaving the state completely

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)?

117. I am very opposed to the proposed consolidation of the CPRA with the Department of Energy and Natural Resources. The CPRA must remain an independent agency. The current structure is working and has public confidence. Consolidating this agency into another will jeopardize that confidence and introduce politics into decision making. Not only has the CPRA been successful in its projects and creating thousands of jobs but consolidation may slow down the work that is being done and work that is planned.

Please leave CPRA an independent agency.

James Wiltenmuth

[jmwiltenmuth@gmail.com](mailto:jmwiltenmuth@gmail.com)

118. **Stakeholder Information:**

Full Name: Henry Sirgo

Louisiana Resident: No

E-Mail Address: hsirgo@yahoo.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? The proposed consolidation will hamper the effectiveness of the Coastal Protection and Restoration Authority by weakening its focus on coastal restoration projects which have been implemented for several decades.

How has or may it impacted you? Your organization? I resided in southern Louisiana for more than sixty-four years and continue to love visiting friends and family there. I admire the leadership on protecting the coast demonstrated by Governors Treen, Roemer, and Foster; as well as Lake Charles Mayors Mount, Roach, and Hunter.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. Hurricanes Betsy, Rita, and Ike affected me. I have memories and knowledge of the effects of Hurricane Audrey, Hurricane Laura, and Hurricane Delta. The integrity of the CRPA must be maintained to protect the seafood industry and quality of life in Louisiana.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective. F.L. Bates, C.W. Fogleman et al. 1965. A LONGITUDINAL STUDY OF HURRICANE AUDREY. (Disaster Study Number 18, Disaster Research Group.

**Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case. I observed first-hand Mayor Roach and Senator Mount in Cameron Parish demonstrating the effectiveness of projects at protecting our beloved Louisiana coast.

Reference relevant citations to strengthen your argument. Gay M. Gomez. 2008. THE LOUISIANA COAST: GUIDE TO AN AMERICAN WETLAND. College Station: Texas A&M University Press. American Press. SURVIVING RITA: HOPE AMID RUIN IN SOUTHWEST LOUISIANA.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

119. I am opposed to eliminating CPRA as an independent agency. CPRA deserves a prominent position within state government. It should not be buried within a division of a regulatory agency (DNR) that is tasked with issuing permits and enforcement - a completely different mission from CPRA. Additionally, the CPRA's independence and history of projects has made

Louisiana and CPRA the recipient of millions of dollars from the BP oil spill. Finally, there is no reason to reduce the number of board members and advisors at CPRA, as they are not compensated, and the state benefits from their valuable input.

Lynnette Judge  
1512 Audubon St  
New Orleans, LA 70118  
[lfjudge@cox.net](mailto:lfjudge@cox.net)

120. **Stakeholder Information:**

Full Name: Lynnette Judge

Louisiana Resident: Yes

E-Mail Address: lfjudge@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Executive Order JML-13

How has or may it impacted you? Your organization? I am opposed to eliminating CPRA as an independent agency. CPRA deserves a prominent position within state government. It should not be buried within a division of a regulatory agency (DNR) that is tasked with issuing permits and enforcement - a completely different mission from CPRA. Additionally, the CPRA's independence and history of projects has made Louisiana and CPRA the recipient of millions of dollars from the BP oil spill. Finally, there is no reason to reduce the number of board members and advisors at CPRA, as they are not compensated, and the state benefits from their valuable input.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? No

121. To Whom It May Concern,

My name is Sarah Giles. I am a biologist, charter fishing guide, and board member of the Coalition to Restore Coastal Louisiana. I strongly oppose combining CPRA with DENR. CPRA must remain an independent agency. The current structure is working to keep us safe from



storms and protect our people and economy. CPRA is one of the most effective and nimble state agencies this state has. It needs to remain an independent organization in order to maintain this ability to get coastal restoration projects done quickly and as cost effectively as possible. The current structure keeps politics out of decision-making about what is best for our state's coastal program. The state's coastal program has created thousands of jobs. For this reason and others, coastal restoration is strongly supported by voters across the state and has earned virtually unanimous support across multiple administrations and Legislatures. There is a serious risk of unanticipated consequences that could slow down the implementation of critical projects and threaten funding need to build them. More time must be devoted to studying the effects of any significant changes such as this. The administration also should be clear about the reasons for any proposed change and consider their validity.

Thank you,

Sarah Giles

[Sarah.cr.giles@gmail.com](mailto:Sarah.cr.giles@gmail.com)

122. To whom this may concern:

The preservation of CPRA as an independent agency is paramount. Over the past two decades, CPRA has thrived as a cornerstone of Louisiana's coastal protection and restoration efforts, underpinned by principled legislation and unwavering commitment. Its accomplishments, guided by science rather than politics, are undeniable. Under its stewardship, CPRA has orchestrated the execution of coastal restoration master plans, securing \$1.6 billion for crucial projects benefiting our citizens and state. Its independence has been pivotal, drawing significant funding post-BP oil spill. Placing CPRA within DENR threatens its autonomy and effectiveness, as their missions diverge sharply. CPRA's crucial role in addressing our existential land loss crisis demands its prominence in state government, safeguarding our way of life and cultural heritage. Any attempt to dismantle CPRA risks undermining the monumental progress achieved, jeopardizing the very essence of Louisiana's future.

LIZA FEOLI

Business Development Director

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2401 Bienville Street, NOLA 70119

123. **Stakeholder Information:**

Full Name: Mtumishi St . Julien

Louisiana Resident: Yes

E-Mail Address: [mtumishi@thesifa.com](mailto:mtumishi@thesifa.com)

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Against consolidation of Coastal Protection and Restoration Authority (CPRA) into La. Dept. Of Energy and Natural Resources.

How has or may it impacted you? Your organization?

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented? We don't see how reducing valuable input from credentialed experts is beneficial to the state of Louisiana—especially if they are not compensated.

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? No

124. **Stakeholder Information:**

Full Name: Jean F Person

Louisiana Resident: Yes

E-Mail Address: personjf@aol.com

Organization (if applicable): Levees.org

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Coastal Protection and Restoration Authority merger

How has or may it impacted you? Your organization? Should remain an entity separate from Dept of Energy and Natural Resources

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? I don't know offhand but if it is, I will vote "NO" to make the change.

Does it fall under existing statutes? Regulations? I presume it does.

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented? No change!

Use specific details to support the case. There is no plausible reason that this merger is needed or to reduce the number of board members and advisors at the CPRA. No board members or advisors receive any form of compensation. The valuable input from credentialed experts is beneficial to the state of Louisiana—especially if they are not compensated.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

125. I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture and all the things we love about our state. CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different mission.

Thank you for your attention to this important matter,

Ann Thorpe Thompson

[Annthomps89@gmail.com](mailto:Annthomps89@gmail.com)

126. **Stakeholder Information:**

Full Name: Doris Elaine Starnes

Louisiana Resident: Yes

E-Mail Address: fleurdelee721@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? The merging of CPRA and the Louisiana Dept of Energy and reduction of board members and credentialed experts is a terrible idea. There is no need or reason for this since none of these people are compensated. In view of the floods of 2005 we need to be grateful and happy to have credentialed experts who are not charging us to give us their unbiased opinion . WE NEED THEM exactly where they are. It makes no sense to merge or reduce these entities and it only lowers the public trust as well as the insurance companies desire to insure in this area. Please don't do this. It is costing the state nothing and is really very effective exactly like it is. The sea level is rising and if anything we need more experts input to advise a city below sea level. Please don't do this.

How has or may it impacted you? Your organization? I was impacted by the Army Corps of Engineers Federal flood of 2005. I lost my home filled with irreplaceable art and antiques. The toll it took mentally, financially , physically and in every way cannot be imagined. The hundreds of thousands of residents who suffered from this deserve the best advisors and that's what we now have. With the sea level rising , we need more experts to operate independently to advise us. One more flood like the last one and no one will want to live here..

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? It could become a legal one if the merged groups and reduced boards experience another flood like the Federal one in 2005.. WE 've worked hard to have the experienced experts we now have .. and they are NOT COMPENSATED.. so what's the problem?

Does it fall under existing statutes? Regulations? I don't know

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. Any relevant information I had was lost in the Federal flood of 2005.. Read the papers from that time.. ask anyone who was exiled for months and had to

start over. Ask about the toll the stress and agony of dealing with it took.. Don't do this to the citizens of this state again.

Did the program your comment concerns change over time? Did it evolve into associated programs? The governor is trying to change it and it will endanger all the people in south Louisiana. WE are blessed and lucky to have the uncompensated experts we now have..please don't make any changes.. it's working as it is.

Provide historical context and perspective. THE FEDERAL FLOOD OF 2005 SHOULD BE ENOUGH to not merge the boards and reduce the members. It's not costing us anything

**Conclusion**

Why should your proposed changes be implemented? Because they are working as they are and don't need to be merged or reduced. and its costing the state nothing. LEAVE IT ALONE

Use specific details to support the case. I lost everything.. just ask the insurance sompanies or read the papers.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? In-Person

127. **Stakeholder Information:**

Full Name: Wendy King

Louisiana Resident: Yes

E-Mail Address: wking70118@yahoo.com

Organization (if applicable): New Orleans Sierra Club

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Governor Jeff Landry seeks to consolidate the Coastal Protection and Restoration Authority (CPRA) underneath the Louisiana Department of Energy and Natural Resources. We see no plausible reason that this merger is needed.

How has or may it impacted you? Your organization? Furthermore, Gov Landry also seeks to reduce the number of board members and advisors at the CPRA.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? We have spoken with many of our colleagues who serve on both boards, and none of them has ever received any form of compensation. We don't see how reducing valuable input from credentialed experts is beneficial to the state of Louisiana—especially if they are not compensated.

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented? We need to restore the coast, without the negative impacts of oil and gas drilling and exploration on coastal restoration.

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual, In-Person

128. 1. I am opposed to eliminating CPRA as an independent agency. It has soared under four governors, creating the master plans for coastal restoration as well as executing these projects. One can't challenge or criticize its success!
2. CPRA must remain an independent agency. Serious legislation has occurred over the past 20 years which resulted in a single state entity able to prioritize Louisiana's coastal protection and restoration efforts in a comprehensive and principled manner. Look at what has been accomplished!
3. It is imperative CPRA remain as an independent agency. Not only does this dilute and diminish CPRA as a stand alone entity at the forefront of state government but DENR (Dept. of energy and natural resources) has a completely different mission, a regulatory body which issues permits.
4. I am opposed to eliminating CPRA as an independent agency. Its success has been extraordinary. In 2024 this independent agency is overseeing \$1.6 Billion dollars in coastal projects, which benefit our citizens and state. If it ain't broke...what are you fixing?
5. It is critical CPRA be an independent agency. It is because of its independence and history of projects based on science, not politics, which has made Louisiana and CPRA the recipient of millions of dollars from the BP oil spill.
6. I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture and all the things we love about our state. CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different mission.
7. CPRA must be an independent agency and placing it within DENR. CPRA is an implementation agency that develops, oversees and implements a scientifically based Master Plan. DENR issues and enforces permit requirements. There is a definite conflict here which will result in a less effective and productive CPRA. Two totally and distinct missions.

Jonathan Kardon  
kardon.jon@gmail.com  
1705 Burgundy Street  
New Orleans, LA 70116

129. **Stakeholder Information:**

Full Name: Carl Baribault  
Louisiana Resident: Yes  
E-Mail Address: cbaribault@bellsouth.net  
Organization (if applicable):  
**Make a Case for Change:**  
Identify the Issue

What is the specific issue you are addressing? Governor Jeff Landry seeks to consolidate the Coastal Protection and Restoration Authority (CPRA) underneath the Louisiana Department of Energy and Natural Resources.

How has or may it impacted you? Your organization? I am a taxpayer, and I find that merging agencies with potential conflicts of interest counter productive at best and appalling at worst.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? No.

Does it fall under existing statutes? Regulations? Yes.

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. See issue above.

Did the program your comment concerns change over time? Did it evolve into associated programs? No.

Provide historical context and perspective. See issue above.

**Conclusion**

Why should your proposed changes be implemented? We see no plausible reason that this merger is needed.

Use specific details to support the case. We don't see how reducing valuable input from credentialed experts is beneficial to the state of Louisiana—especially if they are not compensated.

Reference relevant citations to strengthen your argument. We have spoken with many of our colleagues who serve on both boards, and none of them has ever received any form of compensation.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? No

130. I am opposed to eliminating CPRA as an independent agency. Serious legislation has occurred over the past 20 years which resulted in a single state entity able to prioritize Louisiana's coastal protection and restoration efforts in a comprehensive and principled manner. Look at what has been accomplished!

Respectfully,

Joan Jacob

[Joan.jacob184@gmail.com](mailto:Joan.jacob184@gmail.com)

131. **Stakeholder Information:**

Full Name: Alex DeGiulio

Louisiana Resident: Yes

E-Mail Address: adegulio22@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? I am against merging the Department of Energy and Natural Resources, Coastal Protection and Restoration Authority, the Louisiana Oil-Spill Coordinator's Office, and the Office of State Lands.

How has or may it impacted you? Your organization? As a resident of Louisiana, I depend on the work done by the Coastal Protection and Restoration Authority to ensure the safety, insurability, and longevity of my residence and livelihood. Any changes to the oversight and management of the CPRA would negatively impact the work they do to ensure the continued existence of Louisiana. The CPRA is a highly successful bipartisan agency that is perhaps the most effective agency in the Louisiana state government - namely because it operates independently and with bipartisan support. Any changes will undermine the substantial progress already made.

### **Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

### **Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. Louisiana is facing a land loss crisis. We have already lost an area the size of Delaware. Besides insurance, this is the single biggest challenge facing our state and must be addressed by an independent agency that has the resources and power to confront the crisis. Any efforts to combine the CPRA or change its oversight and management will undermine its ability to perform the critical mission in front of it.

Did the program your comment concerns change over time? Did it evolve into associated programs? In December 2005, meeting in a special session to address recovery issues confronting the state following Katrina and Rita, the Louisiana Legislature restructured the State's Wetland Conservation and Restoration Authority to form the Coastal Protection and Restoration Authority.

Provide historical context and perspective. The CPRA is a highly successful organization that has rebuilt and strengthened large portions of our coast line. It has proven effective at combating the land loss crisis. I do not understand why the State of Louisiana would seek to alter an authority with a superb bipartisan track record, one that benefits oysterman, fishermen, recreational users, and all inhabitants of southern Louisiana. The independent nature of CPRA permits it to operate with other agencies (both federal and state) to advance projects with minimal red tape. The importance of the CPRA cannot be under valued - it represents the continued ability for Louisiana residents to reside in coastal communities. Without an effective CPRA, Louisiana residents should prepare for a future without Southern Louisiana.

### **Conclusion**

Why should your proposed changes be implemented? I am not recommending proposed changes. I am opposed to any consolidation or restructuring of the Coastal Protection and Restoration Authority.

Use specific details to support the case. It is important that CPRA operates independently as a bipartisan effort to address our state's land loss crisis. Consolidation - particularly with the Department of Energy and Natural Resources - is problematic because it will alter the oversight and mission of the CPRA. The condition and crisis on our coast should be treated with the respect it deserves.

Reference relevant citations to strengthen your argument.

### **Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)?

In-Person

132. I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture and all the things we love about our state.  
CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency.  
Thank you,  
Thomas Bryan  
cell 804-513-9309 / [tpbryan@gmail.com](mailto:tpbryan@gmail.com)
133. I am opposed to eliminating CPRA as an independent agency. Not only does this dilute and diminish CPRA as a stand alone entity at the forefront of state government but DENR (Dept. of energy and natural resources) has a completely different mission, which is a regulatory body which issues permits.  
Sincerely,  
Molly Phayer  
[mfphayer@gmail.com](mailto:mfphayer@gmail.com)
134. I am opposed to eliminating CPRA as an independent agency and placing it within DENR. CPRA is an implementation agency that develops, oversees and implements a scientifically based Master Plan. DNR issues and enforces permits requirements, and regulates industry. There is no alignment of mission , as the two agencies are completely distinct. As such, it will result in both being less effective and productive. If you care about Louisiana's future, this cannot be allowed to happen.  
Sent from Mail for Windows  
[apbanos@gmail.com](mailto:apbanos@gmail.com)
135. To Whom It May Concern: As one who has been at the coastal restoration table since inception under Governor Foster, it is shocking to hear of a proposal to diminish the highly successful and independent CPRA. What a star in the Louisiana galaxy this agency has been under the past four governors! Why tarnish what has shined?  
As the chairman of the Governor's Advisory Commission under Gov. Blanco, Jindal and Edwards, I have stood in awe of the accomplishments of each administration. Dedicated, independent and with the best science, CPRA has charted a positive path for restoration and protection for one of the most fragile eco-systems and coasts in the world. It is because of this independence that Congress approved GOMESA in 2006, giving Louisiana at long last a small share of oil and gas revenue, dedicated to coastal restoration. It is because of its independent track record and accomplishments that Louisiana has been awarded the lion's share of the BP oil spill dollars. It is because of the highly successful projects of this independent agency that national foundations have invested in Louisiana and its environmental programs.  
Now is not the time to dimmish its posture in state government. Now is not the time to bury it in a bureaucratic quagmire. Now is the time for Gov. Landry to embrace and take pride in



CPRA's many accomplishments. Now is the time for Gov. Landry to give his imprimatur to CPRA and its importance as an independent agency under his domain.

R. King Milling

[Amilling504@gmail.com](mailto:Amilling504@gmail.com)

136. Dear Governor Landry and team,

I am opposed to eliminating CPRA as an independent agency. It has provided outstanding leadership under four governors, two Republican, two Democrat, creating the master plans for coastal restoration as well as executing these projects. This year it is implementing \$1.6 billion in projects.

To be effective, the CPRA needs to remain an independent agency able to prioritize Louisiana's coastal protection and restoration efforts in a comprehensive and principled manner.

Not only does a merger dilute and diminish CPRA as a stand alone entity at the forefront of coastal restoration efforts, but DENR has a completely different mission as a regulatory body which issues permits.

Please focus on fighting coastal land loss, not on rearranging the organizational chart of state government. The results the people of Louisiana need are projects being implemented timely. We've got an organization ready and able and doing it in CPRA. Please don't try to fix something that isn't broken.

Andy Kopplin

1016 N Lopez

New Orleans, LA 70119

[andykopplinnola@gmail.com](mailto:andykopplinnola@gmail.com)

137. It is imperative that CPRA remain an independent agency in LA. Its success has been extraordinary, working under four governors. In 2024 this independent agency is overseeing \$1.6 Billion dollars in coastal projects which benefit our citizens and our state. It has created the master plans for coastal restoration as well as effectively executing these projects. I am strongly opposed to eliminating CPRA as an independent agency.

Lynda Gladney

820 Esplanade Ave, New Orleans, LA 70116

504-390-3114

[lyndagladney@gmail.com](mailto:lyndagladney@gmail.com)

138. To whom it may concern,

I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture and all the things we love about our state. CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different mission.

Thank you for your attention.

Sincerely

Kerstin Hoener

[Hoenerk13@gmail.com](mailto:Hoenerk13@gmail.com)

139. Gentlemen, I am opposed to eliminating CPRA as an independent agency. Their work has and will continue to be THE crucial element in protecting and restoring our coast. It must remain independent, not buried in another government department.  
Pixie Reiss, New Orleans  
[pixiereiss@gmail.com](mailto:pixiereiss@gmail.com)
- I am opposed to removing the coastal reclamation authority as an independent agency It has done a good job and managed its funding well Sally Reeves  
5801 st Charles avenue  
New Orleans La 70115  
Sent from my iPhone  
[sakr@cox.net](mailto:sakr@cox.net)
140. It is imperative that CPRA remain as an independent agency. Not only does this proposal dilute and diminish CPRA as a stand alone entity at the forefront of state government but DENR (Dept. of energy and natural resources) has a completely different mission, a regulatory body which issues permits  
Steven Usdin  
6 Richmond Place  
New Orleans, La. 70115  
504-388-3063  
[susdin@barrassousdin.com](mailto:susdin@barrassousdin.com)
141. I am opposed to eliminating CPRA as an independent agency and placing it withing DENR. CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different mission. Our land loss crisis impacts our way of life, our culture and all the things we love about Louisiana. Merging these two agencies will result in a less effective and productive CPRA. Now is not the time to go backwards.  
Katherine Bourg  
[kmbourg@me.com](mailto:kmbourg@me.com)
142. I am opposed to eliminating CPRA as an independent agency. The success speaks for itself.  
Thank you, Mary Hines Sent from my iPhone  
[mhhines@gmail.com](mailto:mhhines@gmail.com)
143. To whom it may concern.  
I am a lifelong Louisiana resident, and I am opposed to eliminating CPRA as an independent agency. It has soared under four governors, creating the master plans for coastal restoration as well as executing these projects. One can't challenge or criticize its success.  
CPRA must remain an independent agency. Serious legislation has occurred over the past 20 years that resulted in a single state entity able to prioritize Louisiana's coastal protection and restoration efforts in a comprehensive and principled manner.

Look at what has been accomplished!

It is imperative that CPRA remain an independent agency. Not only does this merger dilute and diminish CPRA as a stand alone entity at the forefront of state government but the Dept. of Energy and Natural Resources has a completely different mission: it's a regulatory body that issues permits.

Respectfully,

Ama Rogan

[arogan@tulane.edu](mailto:arogan@tulane.edu)

144. CPRA must be an independent agency and placing it within DENR will diminish inroads that have been made and future endeavors. CPRA is an implementation agency that develops, oversees and implements a scientifically based Master Plan. DNR issues and enforces permit requirements. There is a definite conflict here which will result in a less effective and productive CPRA. Two totally and distinct missions.

Ann Rabin

Citizen of Louisiana for 74 years!

70115

Sent from my iPhone

[annlrabin@gmail.com](mailto:annlrabin@gmail.com)

145. CPRA needs to remain an independent agency. There has been serious pain staking legislation that has occurred over the past 20 years. It has resulted in a single state entity which has been able to prioritize Louisiana's coastal protection and restoration efforts in a comprehensive and principled manner. Look at what we have been able to accomplish! Do we need to help you?

I am one of the Women of the Storm and wrote Hurricane Katrina her devastation and lessons for us all and was nominated for an Audi which can be downloaded from iTunes. Also, I took the congressional Codel on many tours and showed them our destruction.

Pamela Pipes

[Pamela@pamelapipes.com](mailto:Pamela@pamelapipes.com)

(504) 957-8108

Sent from I-phone

146. I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture and all the things we love about our state.

CPRA must maintain a prominent and independent position within state government and not be buried within a division of a regulatory agency that has a completely different mission and directive. I would venture to say that there is likely a conflict of interest in doing so, in any case.

Respectfully,

Allison

Allison Lewis Stouse

[allisonstouse@me.com](mailto:allisonstouse@me.com)

147. Hello,

I am writing to express my strong opinion that CPRA must remain an independent agency. Serious legislation has occurred over the past 20 years which resulted in a single state entity able to prioritize Louisiana's coastal protection and restoration efforts in a comprehensive and principled manner. Let's keep its success going!

Nathalie Jordi

Nathalie Jordi

504.715.7142

[Nathalie.jordi@gmail.com](mailto:Nathalie.jordi@gmail.com)

148. Gov. Landry,

I'm opposed to eliminating CPRA as an independent agency. Its success has been extraordinary. In 2024 this independent agency is overseeing \$1.6 billion dollars in coastal projects, which benefit our citizens and state. If it ain't broke...what are you fixing. Concentrate on the things that need to be fixed, PLEASE, as there are many.

Congratulations on the crime committee you appointed for New Orleans. I look forward to doing whatever to make our city safer and to have a better quality of life.

Many thanks for your consideration.

Michie Bissell

1026 St. Philip St.

N.O., La. 70116

[michiebissell@gmail.com](mailto:michiebissell@gmail.com)

149. To Whom it May Concern:

It is imperative that CPRA remain an independent agency. Not only does this merger dilute and diminish CPRA as a stand alone entity at the forefront of state government but the Dept. of Energy and Natural Resources has a completely different mission: it's a regulatory body that issues permits.

Sincerely,

Cammie Hill-Prewitt (she/her/hers)

Residency Coordinator

[www.astudiointhewoods.org](http://www.astudiointhewoods.org)

[info@astudiointhewoods.org](mailto:info@astudiointhewoods.org)

150. I am adamantly opposed to eliminating CPRA as an independent agency. Louisiana's loss of land is catastrophic. Our culture, traditions and way of life are dependent on saving our wetlands and coast. Our land! The CPRA is essential to protecting our natural resources - and protecting all of us from increasing hurricanes. Thus it need to be an independent entity within Louisiana government - and NOT buried is an agency with a totally different mission.

Jane Ferguson

Jane Pugh Ferguson (Mrs. Charles A.)

123 Walnut St. (Unit 801)

New Orleans, La. 70118

[nolajane123@gmail.com](mailto:nolajane123@gmail.com)

151. I am opposed to eliminating CPRA as an independent agency. Its success has been extraordinary. In 2024 this independent agency is overseeing \$1.6 Billion dollars in coastal projects, which benefit our citizens and state. If it isn't broke, what exactly are you fixing?

Brett Davis

3966 Magazine St.

New Orleans, LA 70115

[Cbdavis4@gmail.com](mailto:Cbdavis4@gmail.com)

152. It is very important CPRA REMAINS an independent agency. It is an agency based on science not politics, which has made LA and CPRA THE recipient of millions of dollars from the awful BP oil spill. I am opposed to eliminating CPRA as an independent agency.

Ann Cox Strub

Sent from my iPhone

[anncoxstrub@icloud.com](mailto:anncoxstrub@icloud.com)

153. Dear Sirs ,

It has come to our attention that you are thinking of moving the most successful of Louisiana endeavors, the CPRA under the umbrella of a completely different agency.

This is a frightening thought . We have an incredibly successful agency doing vital work to save our coast and you want to bury it in an agency that has a completely different function. Please , please reconsider this possibly catastrophic move. Time is of the essence in saving our coast. We need action and forward thinking and so far the CPRA is our best hope.

Thank you,

Kent G. Davis

[Cbdavis3@cox.net](mailto:Cbdavis3@cox.net)

154. It is essential that CPRA remains as an independent agency. Not only does this dilute and diminish CPRA as a stand alone entity at the forefront of state government but DENR (Dept. of Energy and Natural Resources) has a completely different mission, a regulatory body which issues permits.

Thank you, Jane Dowty (Natchitoches)

[Jane.dowty@gmail.com](mailto:Jane.dowty@gmail.com)

155. Dear Governor Landry,

As a lifelong citizen and resident of Louisiana, I am opposed to merging CPRA into the Department of Energy and Natural Resources (DENR). CPRA has a starring role in tackling Louisiana's most existential issue: coastal erosion and sea-level rise. There is an old saying that "if it ain't broke, don't fix it." CPRA has thrived under four different governors since its inception. As an independent agency, CPRA is less likely to be politicized and made ineffectual. We cannot compromise the agency or its mission!

It makes no sense merging CPRA into the DENR, the former being an agency with singular focus to prioritize Louisiana's coastal protection and restoration efforts in a comprehensive

and principled manner and the latter being a regulatory agency. CPRA is an implementation agency that develops, oversees, and implements a scientifically based Master Plan. DNR issues and enforces permit requirements. There is a definite conflict there which will result in a less effective and productive CPRA. Two totally and distinct missions.

Please DO NOT merge CPRA into DENR.

Best wishes,

Christian T. Brown

Managing Member

NOLA Holdings, LLC

1240 Camp Street

New Orleans, LA 70130

(504) 957-9100

[ctbrown@nolaholdings.com](mailto:ctbrown@nolaholdings.com)

156. **Stakeholder Information:**

Full Name: Stephen C. Picou

Louisiana Resident: Yes

E-Mail Address: stevepicou@yahoo.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? JML-13 authorizing changes in the administration and management of the Coastal Protection and Restoration Authority. I oppose these changes.

How has or may it impacted you? Your organization? The management of planning and projects to manage coastal land loss and its impacts directly affects my ability to thrive in South Louisiana.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? Obviously, if it involves authorization, legislation, and public administration.

Does it fall under existing statutes? Regulations? You all run government and know full well the answers to these questions.

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. I am a lifelong Louisiana resident, born and raised here for more than six decades.

Did the program your comment concerns change over time? Did it evolve into associated programs? Every program evolves. This is an unnecessary question for a public-facing site in which general public comments are sought.

Provide historical context and perspective. You all live here, and some (important) new appointees have no connection or history here. Again, this question is not meant to solicit general comments from citizens and is likely intended (as most of these questions seem) to confuse, confound, and reduce public input.

**Conclusion**

Why should your proposed changes be implemented? I propose no change and strongly support the Coastal Protection and Restoration Authority's retention of its current administrative structure, authority, and operations.

Use specific details to support the case. Again, y'all are making this process too complicated for the average citizen. I have an advanced degree and find these questions tedious, and too legal.

Reference relevant citations to strengthen your argument. This is not a thesis or a legal forum. You intimidate the average citizen seeking to provide input. I strongly disagree with the form and format of this web page and process and urge you to simplify and make citizen participation easier.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

157. To Whom It May Concern:

I am writing to express my strong support for maintaining the Coastal Protection and Restoration Authority (CPRA) as an independent agency. The current structure of CPRA has been effective in safeguarding our state from storms, protecting our people, and bolstering our economy.

One of the key advantages of the current structure is that it keeps politics out of decision-making regarding our state's coastal program. This ensures that decisions are made based on what is best for our coastal areas, free from external influences.

Furthermore, the state's coastal program has been instrumental in creating thousands of jobs. It enjoys strong support from voters across the state and has received near-unanimous support from multiple administrations and Legislatures.

There is a genuine concern that significant changes to CPRA's structure could lead to unanticipated consequences, potentially slowing down the implementation of critical projects and threatening the funding needed to complete them. It is imperative that more time be devoted to studying the effects of such changes, and the administration should be transparent about the reasons behind any proposed changes and their potential benefits.

Finally, public input is crucial in this process. Any decision regarding CPRA's structure should involve extensive public consultation to ensure that the voices of all stakeholders are heard.

In conclusion, maintaining the independence of CPRA is vital for the continued success of our coastal protection and restoration efforts. I urge you to carefully consider these points and support the continued independence of CPRA.

Sincerely,

Mindy Nunez Airhart

[mindy@sse-la.com](mailto:mindy@sse-la.com)

158. **Stakeholder Information:**

Full Name: Patricia Keegan

Louisiana Resident: Yes

E-Mail Address: trish@lennonkeegan.com

Organization (if applicable): Levees.org

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Governor Jeff Landry seeks to consolidate the Coastal Protection and Restoration Authority (CPRA) underneath the Louisiana Department of Energy and Natural Resources. I see no plausible reason that this merger is needed. Furthermore, Gov Landry also seeks to reduce the number of board members and advisors at the CPRA. We have spoken with many of our colleagues who serve on both boards, and none of them has ever received any form of compensation. We don't see how reducing valuable input from credentialed experts is beneficial to the state of Louisiana—especially if they are not compensated.

How has or may it impacted you? Your organization? CPRA has an excellent record of restoring critical wetlands that protect our coastline, our cities and its citizens and property. Levees.org is in sync with these actions for the same reasons. My family and I directly benefit from this work.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented? I propose that CPRA and LDENR remain independent entities-their organizational goals are unique from each other.

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? No

159. Dear Mr. Secretary:

Based on what is proposed and contemplated in Executive Order No. JML 24-13, CPRA should not be restructured. If something is not broken, then it should not be fixed. CPRA has flourished as an independent agency since its inception in the wake of Katrina, and its structure, which has fostered the Agency's growing successes, should not be transformed.

There are several pieces of the effort set forth in Executive Order No. JML 24-13 reflecting sensible and sound policy. For example, the effort to consolidate oversight and management of several smaller boards and commissions under an umbrella entity that would more effectively coordinate related goals is certainly something that would both reduce bureaucracy and increase the efficiency in the state. However, with regard to CPRA, dismantling its independence runs counter to the basic structure and resultant success of the Agency. As many accomplished legislators on both sides of the aisle (and for many years) would note, CPRA is, by design, an independent authority of the state government. Its current structure was deliberately designed to remove it from the swaying pendulum of politics and



insulate it from excessive executive, legislative, or even judicial pressure or interference. This is because the unique mission and founding intent behind CPRA is that it must address massive regional problems over timeframes of decades. CPRA's core responsibilities of being in charge of the Master Plan, the Trust Fund, and executing projects under the Master Plan mirror those decade-expansive timeframes.

Accordingly, the formation and structuring of CPRA was no accident. The Legislature, along with the Governor's Office, the courts, and thousands of interested stakeholders came together resulting in the realization of the way in which CPRA was and is situated in the state government, organized, and operated. CPRA is vested with a set of authorities and powers that, by necessity, must be exercised with a view towards the long term. The problem with putting CPRA in an existing structure that serves the current elected Administration is simply that administrations change, including at least every eight years, and sometimes more frequently. If CPRA is forced to change, tacking every eight or four years in the process of executing a 50-year Master Plan, then CRPA will simply be rendered irrelevant. Such artificial administration-dependent dynamics are not in accord with the way in which the Agency is designed to operate.

Importantly, the Governor's Office already has significant control and influence on CPRA's directives through the Governor's Office of Coastal Activities. Placing CPRA under DNR would only serve to make the process by which the Governor's Office of Coastal Activities interacts with CPRA, not to mention other stakeholders' necessary interactions, more cumbersome, not less. Thus, in direct contravention of the stated goal of the Executive Order, inefficiencies and project delays, at the very least, would result.

Legislators from both sides of the aisle and from across the state have long bragged about the independent success of CPRA, along with the positive economic impact by the Louisiana companies implanting work under its Master Plan such success has brought. Quite simply, there is no reason to tamper with the structure at the basis of those successes.

Respectfully submitted,

-Brendan Hughes

[Brendan.n.hughes@gmail.com](mailto:Brendan.n.hughes@gmail.com)

160. Attached and pasted below:

Re: Comment for Executive Order JML 24-13, which was issued regarding the review and consideration of optimizing various offices, agencies, and authorities including the Coastal Protection and Restoration Authority and the Louisiana Department of Energy and Natural Resources.: JML-Executive-Order-13.pdf (louisiana.gov)

Over its eight decades as an organization, Louisiana Wildlife Federation (LWF) has facilitated citizen action and engagement in natural resources management on behalf of our membership that has been comprised of hunters, anglers, paddlers, campers, boaters and birders who appreciate Louisiana's abundance of wildlife and the heritage of outdoor recreation we enjoy. Our membership of more than 10,000 today prioritize coastal habitat conservation and sustainability as crucial for Louisiana's economic and environmental stability.

Because our membership values Louisiana's wildlife and the habitat that has earned Louisiana's reputation as Sportsman's Paradise, our members have keenly and earnestly

worked to draw attention and effective action to address Louisiana's coastal land loss crisis since the 1980s. Over that time, we have collectively witnessed and offered our participation in the actions the state has taken to address this crisis.

It's understandable that your administration would want to look at how the state is managing coastal restoration and flood protection. There is always room for improvement. Each governor since Governor Roemer has given coastal restoration increasing priority and attention. Since Act 6 enacted by the state legislature in 1989 began to address coastal restoration and created a division at what was then called Louisiana Department of Natural Resources, the planning, management, and implementation has grown to require its own entity for coordination. This was recognized by the legislature and citizens after Hurricanes Katrina and Rita in 2005.

Having a Governor's Office of Coastal Activities elevates the importance of our coastal resources and attendant land loss crisis. It's been incredibly helpful to have CPRA created and function as it is today to integrate protection and restoration planning for the entire coastal zone. This work requires a broad focus that transcends more than one state agency and draws interest from a large and diverse group of stakeholders. The Governor's Advisory Commission on Coastal Protection, Restoration, and Conservation, on which LWF's executive director currently serves, does provide input for planning to help work through conflicts or divided interests in a more coordinated way. Its purpose is valuable to identify and discuss emerging issues with perspective from a cross section of stakeholders.

The momentum gained since the state consolidated work in CPRA has been tremendous. Accolades for Louisiana's planning and management of coastal restoration through CPRA, from national and international interests, has been a bright spot of pride for our state. To be seen as a leader in a field that needs engineering, construction, and research is certainly where Louisiana should continue striving to stay on top. CPRA as it is formed today has gotten us to that level.

It's important to acknowledge that CPRA's last two annual plans were able to budget spending for a billion dollars each year and mainly for project construction.

For example, the year ahead includes a \$1.68 billion budget of which less than \$25 million is state funding. CPRA consistently leverages non-state funding. Only 1% of that \$1.68 billion is planning dollars. The vast majority of funds are for project implementation and operation. Since 2007, CPRA has seen success in the form of 358 miles of levee improvement, 60 miles of barrier island and headland restoration, and restoration project benefits covering 82 square miles of coastal habitat. This is real progress.

The coastal zone comprises nearly half our state and is home to a majority of our citizens. The complex levels of coordination among agencies and with local and federal entities while looking toward the expanding footprints of new energy production in Louisiana's coast requires an agency like CPRA to manage the larger picture.

One of LWF's ongoing concerns is assuring our coastal estuaries are allowed to remain as natural in function as possible to maintain the renowned productivity in seafood and wildlife that Louisiana has historically enjoyed and benefitted from. To have CPRA focused on balancing protection and restoration is vital. The planning process needed to strike this balance and possible trade-offs should not be buried in one agency or another. We have been there before as a state.

LWF's commitment to citizen input can be seen in the commissions and task forces for which we have the duty and honor to recommend appointments. Some of these are mentioned in the Executive Order. LWF's membership values this kind of stakeholder engagement and transparency. The Oilfield Site Restoration Commission serves an important oversight role and brings together industry and environmental groups to work through the real safety and environmental concerns presented by the large amount of abandoned oil wells in the state. LWF recommends keeping this commission that is currently connected to the Oil-Spill Coordinator's Office but would be no less effective connected to LDENR.

Finally, LWF has identified water management as another high priority for Louisiana and the state is slow in securing this resource for the future. While many see Louisiana as having an overabundance of water, that is not always the case. Freshwater and potable water is essential for people and wildlife and it is vital to Louisiana's economy. To squander or waste it is not in the citizens' interest and there are opportunities and threats to Louisiana's water future. The Sparta Groundwater Conservation District and the Capital Area Groundwater Conservation District each represent areas where groundwater has been or is being overused. Management is needed. Yet groundwater is only one aspect of the full picture of water management. Transportation, manufacturing, agriculture, and municipal users are just a few of the stakeholders. This is where the Water Resources Commission has been playing a useful role and was created to address concerns around the sale and removal of water from the state but more issues for water have emerged. This Commission meets regularly and has been connected to LDENR. LWF also has a role in recommending an appointment to represent conservation interests. We strongly believe this commission is needed at this time.

Thank you for the opportunity to comment on Executive Order Number JML 24-13 and we look forward to offering more comments once we see the coming report of February 23, 2024. Please call on LWF for any assistance we can provide the new administration.

Rebecca Triche

Executive Director

Louisiana Wildlife Federation

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# 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  
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February 21, 2024

To: [driveinitiative@la.gov](mailto:driveinitiative@la.gov)

Re: Comment for Executive Order JML 24-13, which was issued regarding the review and consideration of optimizing various offices, agencies, and authorities including the Coastal Protection and Restoration Authority and the Louisiana Department of Energy and Natural Resources.: [JML-Executive-Order-13.pdf \(louisiana.gov\)](#)

To Whom It May Concern:

Over its eight decades as an organization, Louisiana Wildlife Federation (LWF) has facilitated citizen action and engagement in natural resources management on behalf of our membership that has been comprised of hunters, anglers, paddlers, campers, boaters and birders who appreciate Louisiana's abundance of wildlife and the heritage of outdoor recreation we enjoy. Our membership of more than 10,000 today prioritize coastal habitat conservation and sustainability as crucial for Louisiana's economic and environmental stability.

Because our membership values Louisiana's wildlife and the habitat that has earned Louisiana's reputation as Sportsman's Paradise, our members have keenly and earnestly worked to draw attention and effective action to address Louisiana's coastal land loss crisis since the 1980s. Over that time, we have collectively witnessed and offered our participation in the actions the state has taken to address this crisis.

It's understandable that your administration would want to look at how the state is managing coastal restoration and flood protection. There is always room for improvement. Each governor since Governor Roemer has given coastal restoration increasing priority and attention. Since Act 6 enacted by the state legislature in 1989 began to address coastal restoration and created a division at what was then called Louisiana Department of Natural Resources, the planning, management, and implementation has grown to require its own entity for coordination. This was recognized by the legislature and citizens after Hurricanes Katrina and Rita in 2005.

Having a Governor's Office of Coastal Activities elevates the importance of our coastal resources and attendant land loss crisis. It's been incredibly helpful to have CPRA created and function as it is today to integrate protection and restoration planning for the entire coastal zone. This work requires a broad focus that transcends more than one state agency and draws interest from a large and diverse group of stakeholders. The Governor's Advisory Commission on Coastal Protection, Restoration, and Conservation, on which LWF's executive director currently serves, does provide input for planning to help work through conflicts or divided interests in a more coordinated way. Its purpose

is valuable to identify and discuss emerging issues with perspective from a cross section of stakeholders.

The momentum gained since the state consolidated work in CPRA has been tremendous. Accolades for Louisiana's planning and management of coastal restoration through CPRA, from national and international interests, has been a bright spot of pride for our state. To be seen as a leader in a field that needs engineering, construction, and research is certainly where Louisiana should continue striving to stay on top. CPRA as it is formed today has gotten us to that level.

It's important to acknowledge that CPRA's last two annual plans were able to budget spending for a billion dollars each year and mainly for project construction.

For example, the year ahead includes a \$1.68 billion budget of which less than \$25 million is state funding. CPRA consistently leverages non-state funding. Only 1% of that \$1.68 billion is planning dollars. The vast majority of funds are for project implementation and operation. Since 2007, CPRA has seen success in the form of 358 miles of levee improvement, 60 miles of barrier island and headland restoration, and restoration project benefits covering 82 square miles of coastal habitat. This is real progress.

The coastal zone comprises nearly half our state and is home to a majority of our citizens. The complex levels of coordination among agencies and with local and federal entities while looking toward the expanding footprints of new energy production in Louisiana's coast requires an agency like CPRA to manage the larger picture.

One of LWF's ongoing concerns is assuring our coastal estuaries are allowed to remain as natural in function as possible to maintain the renowned productivity in seafood and wildlife that Louisiana has historically enjoyed and benefitted from. To have CPRA focused on balancing protection and restoration is vital. The planning process needed to strike this balance and possible trade-offs should not be buried in one agency or another. We have been there before as a state.

LWF's commitment to citizen input can be seen in the commissions and task forces for which we have the duty and honor to recommend appointments. Some of these are mentioned in the Executive Order. LWF's membership values this kind of stakeholder engagement and transparency. The Oilfield Site Restoration Commission serves an important oversight role and brings together industry and environmental groups to work through the real safety and environmental concerns presented by the large amount of abandoned oil wells in the state. LWF recommends keeping this commission that is currently connected to the Oil-Spill Coordinator's Office but would be no less effective connected to LDENR.

Finally, LWF has identified water management as another high priority for Louisiana and the state is slow in securing this resource for the future. While many see Louisiana as having an overabundance of water, that is not always the case. Freshwater and potable

water is essential for people and wildlife and it is vital to Louisiana's economy. To squander or waste it is not in the citizens' interest and there are opportunities and threats to Louisiana's water future. The Sparta Groundwater Conservation District and the Capital Area Groundwater Conservation District each represent areas where groundwater has been or is being overused. Management is needed. Yet groundwater is only one aspect of the full picture of water management. Transportation, manufacturing, agriculture, and municipal users are just a few of the stakeholders. This is where the Water Resources Commission has been playing a useful role and was created to address concerns around the sale and removal of water from the state but more issues for water have emerged. This Commission meets regularly and has been connected to LDENR. LWF also has a role in recommending an appointment to represent conservation interests. We strongly believe this commission is needed at this time.

Thank you for the opportunity to comment on Executive Order Number JML 24-13 and we look forward to offering more comments once we see the coming report of February 23, 2024. Please call on LWF for any assistance we can provide the new administration.

Sincerely,

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

Rebecca Triche  
Executive Director

161. **Stakeholder Information:**

Full Name: Sandra Rosenthal

Louisiana Resident: Yes

E-Mail Address: sandy@levees.org

Organization (if applicable): Levees.org

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Movement of the CPRA to under the Dept of Energy and Natural Resources.

How has or may it impacted you? Your organization? I am a resident of coastal LA. Flood protections projects sponsored locally by the CPRA

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? Yes. A constitutional amendment was passed after Hurricane Katrina.

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. Public Law 109-148 setup the CPRA whose chair reports to the Governor. This should not change. I also don't feel the the number of board members and advisory board members should reduced. especially since, in my understanding none are compensated.

Did the program your comment concerns change over time? Did it evolve into associated programs? No

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented? 1. The CPRA should report to the Governor, not to the DNR. 2. The number of advisors in the CPRA should not be reduced if they are not compensated. 3. The number of Board members in the CPRA should not be reduced if they are not compensated.

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? In-Person

162. To whom it may concern,

Hello, my name is Annabelle Owens and I am a resident of Louisiana. I have an educational background in Biology, with a focus in public health. Due to my background knowledge and education, I am strongly opposed to the consolidation of Coastal Protections with the Department of Energy and Natural Resources. This concerns me because this consolidation would likely leave the protections of the coast in the hands of those with conflicts of interest, including backgrounds in the energy or fossil fuel fields. Please consider my comment and

vote not to consolidate these departments. The livelihood of Louisiana's coast is in your hands, and the people of Louisiana will not forget what you do with it.

Thank you,

Annabelle Owens

[Annabelle.owens01@gmail.com](mailto:Annabelle.owens01@gmail.com)

**163. Stakeholder Information:**

Full Name: Margie Vicknair-Pray

Louisiana Resident: Yes

E-Mail Address: nolamargie@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? EO-JML-13

How has or may it impacted you? Your organization? As a Louisiana native and resident, I am appalled by our State's lack of concern for future generations of Louisianans. I am further appalled by your total lack of regard for our State's resources. The consolidation of the Department of Energy and Natural Resources, Coastal Protection and Restoration Authority, the Louisiana Oil-Spill Coordinator's Office, and the Office of State Lands is not viable or productive, except for allowing oil and gas to control, destroy and pollute even more than they already do. Your grandchildren will remember you as a despicable sell-out who poisoned their future. And so will I.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? The citizens of Louisiana own the resources, not the Government. The Government is supposed to protect citizens and manage the State's resources to benefit the people.

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs? No, the program did not "evolve." It's been hijacked.

Provide historical context and perspective. We were once the leading producer of seafood in the nation. Thanks mostly to oil and gas we can no longer provide a surplus of seafood. Yet your idea of consolidating departments allows for more devastating actions against the people who are really the heart of Louisiana - the shrimpers, fishermen, oystermen crawfish farmers and recreational fishermen and hunters who are seeing a shortage of everything that they depend on thanks to destruction of the environment.

**Conclusion**

Why should your proposed changes be implemented? The proposed changes (consolidation) should NOT be implemented.

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**



Would you be interested in attending stakeholder meeting(s)?

Virtual,In-Person

164. Secretary Gray,

Please see the attached document for comments regarding Executive Order JML-13 on behalf of Restore the Mississippi River Delta Coalition.

Thank you,

Lauren C. Bourg

Director

Restore the Mississippi River Delta

225.776.9838 (c)

Audubon Delta

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[lauren.bourg@audubon.org](mailto:lauren.bourg@audubon.org)

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February 21, 2024

Office of the Governor  
PO Box 94004  
Baton Rouge, LA 70804

**RE: Executive Order JML-13: Consolidation of Natural Resources and Energy Related Executive Branch Functions, Powers, Duties, and Responsibilities**

Dear Secretary Gray,

We are writing on behalf of four members of The Restore the Mississippi River Delta Coalition, the Environmental Defense Fund, National Audubon Society, the National Wildlife Federation and Pontchartrain Conservancy. Together, we have worked with the Coastal Protection and Restoration Authority since its very early days to bring technical, community outreach, communications and policy expertise to the cause of coastal restoration. During this time, our coalition members have served in a wide array of partnership roles, including advisory and technical working groups for Coastal Master Plan processes, Governor's Advisory Commission, and as a regular supporter of coastal funding initiatives. Our advocacy efforts educate key stakeholders, ensure widespread engagement and provide public, technical and policy support. This work is most effective, largely due to the accessibility and responsiveness of CPRA made possible through its standalone structure. It is a win-win for the coast and for our communities.

Over the years, Restore the Mississippi River Delta (MRD) and Louisiana's Coastal Protection and Restoration Authority (CPRA) have had many successes across coastal Louisiana. The MRD acts as a key point of connection to CPRA's work—most notably the Coastal Master Plan – for thousands of coastal stakeholders, ranging from community leaders to business interests to sportsmen. With CPRA, we have helped provide logistical and content support for hundreds of community conversations and other public meetings throughout the state about the Coastal Master Plan and its projects, like sediment diversions, so the public can enter dialogue directly with CPRA leaders. The MRD also coordinates with CPRA on federal opportunities – helping to guide the U.S. Army Corps of Engineers (USACE) since 2007 on the Mississippi River-Gulf Outlet ecosystem restoration and advocating for RESTORE Act implementation and project selection. Working together, we have protected billions of dollars in secured funding for restoration and protection projects, continue to explore new options and finance mechanisms to secure future funds and have identified and successfully advocated for innovative cost-saving strategies for project mitigation (e.g., mobilized public support and coordinated with the USACE and CPRA to secure the CPRA Maurepas freshwater diversion as the mitigation for the USACE West Shore Lake Pontchartrain levee project).

For over 20 years, four Louisiana governors and the Louisiana Legislature have recognized the centrality of the coastal crisis to the safety, prosperity and future of coastal Louisiana. They have passed legislation, enacted policies and supported constitutional amendments to enable a single state entity to prioritize Louisiana's coastal protection and restoration efforts in a comprehensive and principled manner.



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Louisiana's Coastal Protection and Restoration Authority (CPRA) is now the standard bearer for national efforts to protect people, assets and the natural environment from the threats of hurricanes and sea level rise. The program that has evolved is supported by countless advocates from a diverse group of stakeholders including community groups, industry, environmental organizations and business interests. CPRA's nationally and internationally recognized accomplishments are the result of the agency's singular focus on coastal protection and restoration work, and their commitment to science-based planning, proven track record of project implementation and wide-ranging support from the public and stakeholders is still evident and relevant today. Despite Louisiana's laudable accomplishments, the coastal crisis is as serious and dire as ever.

The CPRA exemplifies effectiveness and efficiency in state government. Over the last few years, the CPRA has delivered record-breaking levels of investment in largest-of-their-kind projects that have protected communities, preserved and restored ecosystems and both guarded and spawned economic activity. Since 2007, CPRA has completed 157 projects, benefiting 55,000 acres of coastal wetlands, improving 370 miles of levees and constructing 70 miles of barrier islands. Other states and countries are looking to Louisiana as a model for approaching an existential climate and land loss crisis. CPRA's science-based planning and project implementation expertise is the gold standard for facing the growing environmental threats facing coasts everywhere.

Moving the restoration and protection functions currently housed at CPRA under the Department of Energy and Natural Resources (DENR) would dilute and diminish the importance of the coastal crisis by diminishing the agency's status as a standalone, independent entity prominently seated at the forefront of state government. This proposed change in structure would be a misguided and ill-timed de-prioritization of an issue that still demands the state's attention at the highest levels. While the structure of the state's coastal program came into being nearly 20 years ago following the devastation of Hurricanes Katrina and Rita, the record storm seasons of 2020 and 2021 provide fresh evidence of the urgency and severity of the threats facing coastal communities across Louisiana—and the incredible impact of restoration and protection measures implemented to date by the CPRA that lessened the severity of the impacts of those storms on the landscape. The state's own projections warn of a coast facing increasing challenges of land loss and storm surge risk in the future, warnings supported by the world's leading scientists.

The successes of the coastal program are the product of a lean and focused organization that leverages around \$25 million of state mineral revenues into an over-\$1-billion-a-year construction program that benefits every community along the coast and the entire state. Louisiana's coastal program was specifically designed to highlight and focus state and national attention on a matter of extreme urgency and consequence for the future of Louisiana. Any attempt to reorganize this efficient and essential part of Louisiana's government risks distraction from the critical mission at hand.

The following specific comments and examples illustrate this position further.

### Origins of the Coastal Program

The coastal program evolved from the late 1970s and 1980s through the creation of the Coastal Resources Program (followed by the federally approved Coastal Zone Management Program, 1980) and the Office of Coastal Restoration and Management program and fund (1989). Congress passed the Coastal Wetlands Planning Protection and Restoration Act



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(CWPPRA) in 1990, bringing much-needed federal funding into the equation for coastal wetlands protection at that time. These efforts, housed within the Department of Natural Resources, coupled with levee management under the Department of Transportation and Development public works section, proceeded separately into the early 2000s.

Following the devastating 2005 hurricane season, Congress and the Corps of Engineers demanded a single state entity as their partner for rebuilding, managing, and operating and maintaining the construction of the New Orleans Area Hurricane Storm Damage Risk Reduction System. The engineering and science community also agreed through a variety of papers and reports in 2005 and 2006 that the key to Louisiana's future success would hinge on the integration of existing but disparate agency functions into one cohesive organization whose sole purpose was the restoration and protection of Louisiana's fragile coast.

In response, state leaders crafted the unique structure of the CPRA board and implementation office (see further details below) to specifically address the prior deficiencies in governance exposed by Hurricanes Katrina and Rita. Prior to the creation of CPRA, the state lacked a single, comprehensive vision for the protection and restoration of the coast. Both the Department of Natural Resources and the Department of Transportation and Development routinely engaged Congress and other stakeholders with competing interests relating coastal issues, and the oversight responsibilities for maintenance of the standards and operations of levee systems was not centralized.

The creation of CPRA within the Office of the Governor from portions of the Department of Natural Resources and portions of the Department of Transportation and Development gave an existential issue facing the entire coast the highest priority and visibility within the state. It established a single entity with the responsibility and authority to address the coastal crisis; it empowered it to efficiently and clearly engage with federal partners and Congress to expedite the completion of the GNO HSDRRS; and it instituted the development of a systematic and comprehensive approach to managing and responding to a crisis that involves multiple state agencies, natural resources, stakeholder groups and communities.

Disengaging these issues from existing departments and creating a new state agency took multiple pieces of legislation over years, including reauthorizations, allowing several different points to examine its effectiveness and efficiencies.

### **The Nature of the Coastal Crisis**

The nature of the coastal problem is one of both increasing land loss and rising storm surge flood risk, and whose implications are all-encompassing. With direct and indirect consequences of this crisis intersecting the authorities and expertise of multiple state and federal entities, the Governor's Office and the multi-agency and regionally representative CPRA Board are uniquely suited to oversee and manage a coordinated state response. Rather than being "isolated unnecessarily," Louisiana's coastal program was specifically designed to highlight and focus state and national attention on a matter of extreme urgency and consequence for the future of Louisiana. Since 2005, CPRA has successfully led the implementation of critical projects to protect and restore the coast. Despite these efforts, risks to Louisiana's coast remain high today and are projected to increase in the future. Given the continued threat, the highest levels of the executive branch should remain intently focused on maintaining CPRA's positive momentum.





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### Emergency Response Function

Coordination and consistency across agencies and across levels of government is essential during and immediately after natural disasters. CPRA excels at providing clear and consistent communication, resources and support to local governments, local levee districts and other state agencies during tropical weather and major flooding events.

This element of CPRA's structure represents a direct reform following the disasters of Hurricanes Katrina and Rita when *Hurricane Katrina: a Nation Still Unprepared*, a special report of the Committee on Homeland Security and Government Affairs, found that "neither LA DOTD nor any state agency made sure that the state's levee districts were integrated into the state's emergency-planning process, much less genuinely prepared for an emergency. As a result, when Katrina made landfall, no Orleans Levee District personnel were located at, or in contact with, emergency managers in Baton Rouge; nor was any mechanism in place to request additional support from the state." The committee also found that in the immediate aftermath of Katrina, "resolving the dispute over who was in charge of the repair effort and the full-scale efforts to fill the breaches took three days. No such dispute should have occurred, and resolution should not have taken so long. Responsibilities among the levee districts, the LA DOTD, and the Corps should have been understood and documented...In the end, neither the Corps, the LA DOTD, nor the levee districts had any plan in place, nor had they determined or planned in advance who would be responsible for, and have the assets nearby, to address a major breach of the levees or floodwalls."

Today's CPRA is a well-oiled response machine that knows and serves its emergency roles and functions. Staff is integral to the Unified Command Group response group allocated to the Emergency Operations Center during natural and technical disasters, providing resources such as modeling and engineering expertise, commanding logistics supports for local parishes and flood authorities, and providing support to other agencies and emergency responders, leveraging strong relationships with local officials, the congressional delegation and even the USACE to expedite response and recovery. Changes to the structure of CPRA should not hinder its successful emergency response role.

### Public Support for CPRA and the Coastal Master Plan

Since the passage of Act 8 of the First Extraordinary Session of 2005, the residents of Louisiana have benefited from a single voice and single point of entry for engaging with the state on coastal protection and restoration issues. Over the course of nearly 20 years, people, businesses and organizations inside and outside of Louisiana have learned to engage with the CPRA through its monthly board meetings, Governor's Advisory Commission meetings, Coastal Master Plan and Annual Plan processes and public meetings, and other direct points of engagement with program staff.

The consistent public engagement and education efforts coupled with aggressive project implementation have garnered tremendous public support for the state's coastal program. Bipartisan polling conducted by our organizations in 2023 showed that 95 percent of respondents support working to maintain as much coastal land as possible. Louisiana voters also largely approve of how the state is tackling its land loss crisis, with 92 percent agreeing it is important to have a comprehensive plan (the Coastal Master Plan) to deal with land loss using the latest science. This public support has been echoed by the state Legislature with unanimous passage of the 2007, 2012, 2017 and 2023 Coastal Master Plans.



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Our coalition has directly engaged citizens hundreds of thousands of times in CPRA coastal processes. Consolidating the functions of CPRA within DENR will create confusion for voters familiar with the CPRA, its projects, plans and programs. The value of this support translates into supportive comments, letters, and advocacy that help to secure federal funding, Army Corps of Engineers projects in Louisiana, and other grants and opportunities that benefit Louisiana's coast.

### Maximizing Funding for the Coast

CPRA is a highly efficient and effective organization that receives virtually no funding from the state's general fund. Relying on between \$5 million and \$25 million of annual support in the form of mineral revenues (i.e. not general taxpayer funds), the CPRA and its roughly 180 employees regularly oversee and implement a \$600 million to \$1.7 billion comprehensive program of protection and restoration projects. The Annual Plan proposed for FY25 lists \$1.68 billion in expenditures with \$1.32 billion allocated to construction with recurring state dollars representing a mere 1.5% of CPRA's projected revenues. This level of annual spending produces nearly 11,000 direct jobs with a labor income of \$560 million, according to our partners at GNO, Inc. Job creation and labor income multiplies with indirect jobs and does not include the billions of dollars of funding directed to the New Orleans District of the Army Corps of Engineers for its current portfolio of projects.

There can be no "wiser use of state funds" than to allow a program that consistently utilizes fewer than \$25 million of state funds to draw down over a billion dollars of nonstate revenues for a construction program that provides billions of dollars of benefits to the people, economy and natural resources of the state.

### "A Better Business Climate"

One of the stated goals in EC JML 2024-13 is to create a "better business climate" for industry and the DENR. The singular focus of the state's coastal program streamlines engagement, concentrates expertise, and provides clear and direct avenues for private sector engagement through transparent and consistent processes and timelines. Moreover, the coastal program has excelled at partnering with other state agencies, business groups and the private sector to encourage and grow workforce opportunities, economic development opportunities, and generally maximize the economic impacts of investments in the protection and restoration of Louisiana's coast through activities like Industry Day, their partnership with the Louisiana Workforce Commission around the Louisiana First Hiring Act, and their partnership with Louisiana Economic Development that created the Coastal Technical Assistance Center (CTAC).

The surest route to a better business climate in Louisiana is to address the perception and reality of Louisiana's coastal risk. CPRA consistently invests (almost exclusively) federal and private (oil spill settlement) funds in proven, science-backed, proactive projects that protect communities and ecosystems against the risks from rising sea levels and hurricane storm surge.

### Contracts and Legal Questions

Since its inception, the CPRA has penned countless contractual agreements with parties such as the U.S. Army Corps of Engineers (Corps), U.S. Department of Justice, Louisiana Trustee Implementation Group (TIG), the RESTORE Council, National Fish and Wildlife Federation (NFWF), landowners across the coastal area and many others under its "single state authority" designation to implement hurricane protection and restoration projects in the coastal area.



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No longer a new agency, CPRA currently benefits from the efficiencies garnered from the considerable investment of time and effort to establish its contracting authority following its creation from portions of DNR and DOTD. To move CPRA back under DNR could add additional layers of contract review, approval and process that could cost time and create a burden for the DENR Office of the Secretary. Should DENR assume contracting on behalf of CPRA, it will be forced to balance the priorities of executing coastal construction contracts with other energy or coastal management contracts. More concerning is the potential that this change in contracting authority would trigger hundreds of amendments (and potentially requests to renegotiate) on existing contracts, sending contracts currently in process into limbo until they can be redrafted under a new system.

Contracts are but one example of a myriad of unnecessary administrative tasks and functions (like human resources, IT, specialized legal defense and accounting) that will be necessitated to undo a merger of agency functions, a waste of time and energy that is better spent on implementing projects.

### **Compatibility with DENR Mission and Natural Resources Management**

The core mission of the DENR is “to ensure and promote sustainable and responsible use of the natural resources of our state so that they are available for the enjoyment and benefit of our citizens now and in the future.” Article IX of the Louisiana Constitution further notes that “the natural resources of the state, including air and water, and the healthful, scenic, historic and aesthetic quality of the environment shall be protected.” While the terms “resources” and “use of natural resources” noted in the mission statement are broad, and while they may give a passing nod to protecting wetlands, none of this terminology applies to the types of infrastructure and engineering required in the implementation and oversight of hurricane protection systems. Floodgates, levees, floodwalls and the like are not a similar service offering to traditional activities of the DENR. This is an unnatural fit that underscores the very reasons that DNR and DOTD staff were molded into the original CPRA rather than being absorbed within DNR nearly 20 years ago.

Additionally, DENR is not now and has never been a public works entity. The original functions and services taken from the Department of Transportation and Development to create CPRA are a linchpin of the organization’s work. DOTD still manages river levees and other flood response activities outside of the coastal area and maintains familiar partnerships with CPRA when needed. Placing CPRA under the DENR would create stovepipes and distance between these entities that could cause unnecessary challenges in communication and efficiency.

### **Permitting and Regulatory Enforcement**

A balanced approach to permitting, enforcement and management practices related to the state’s fragile coast requires the separation of decisions relating to the permitting of activities along the coast from those related to the protection and restoration of that coast. Permitting requires managing regulatory relationships with industry and other users that are different from and detrimental to the types of partnerships required to advance restoration or protection projects.

DENR issues and enforces permit requirements as a function of the Office of Coastal Management under the purview of the Office of Assistant Secretary. CPRA is an implementation agency that develops, oversees and implements a





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scientifically based Coastal Master Plan. The current permitting process requires minimal input from CPRA through a check for inconsistency and does not delay the approval process.

Putting CPRA under DENR would place it within the agency responsible for regulating coastal use permits. This conflict was deliberated in the past, and the determination, supported by both industry and coastal stakeholders, was that these functions should remain housed in separate agencies.

### **Additional Comments Related to Coastal Boards and Commissions**

Reflection on the implications of the coastal crisis reveals that the issues, the science and the stakeholders are too diverse and important to be relegated to a single state agency or single monthly board meeting. Additional boards and commissions dedicated to coastal issues provide space to hold deeper and more specific conversations that can better inform decision-makers, interest groups and the public about potential projects or policies.

The Governor's Advisory Commission on Coastal Protection, Restoration, and Conservation is explicitly designed by the Legislature to collect input from and disseminate information to a wide range of stakeholders impacted by the coastal crisis and the state's response. Diminishing or eliminating this outlet for quality information and discussion would do a disservice to the complexity of the coastal issue and the different people and groups who are invested in shaping the state's response.

Specially established boards, commissions or advisory panels can serve critical roles in finding common ground and formulating policy responses to complex issues that affect multiple government agencies, economic sectors or communities.

Government efficiency is not improved when a highly effective and transparent agency is buried under additional layers of bureaucracy and oversight at an already large state agency with many responsibilities of its own. Furthermore, consolidating the functions of CPRA within DENR would create, not eliminate public, industry and governmental confusion when it comes to the state's efforts to combat the coastal crisis.

The CPRA and the structures that support it are still as vital and essential as ever. The reforms established in the aftermath of Hurricanes Katrina and Rita are working as intended or properly formulated to address the continuing and existential nature of the coastal crisis. Rather than being "isolated unnecessarily," Louisiana's coastal program was specifically designed to highlight and focus state and national attention on a matter of extreme urgency and consequence for the future of Louisiana.

In conclusion, the state's coastal program is already an expression of government efficiency in that it was formed by consolidating disparate functions of two separate agencies to achieve better outcomes related to comprehensive planning, project implementation and securing federal funding and policy support. The state's response to the coastal crisis, with impacts and implications that cross the authorities and expertise of multiple state and federal entities, is better served by the Governor's Office and the multi-agency and regionally representative CPRA Board than a subsidiary of a single state agency.





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Finally, Executive Order JML 2024-13 requires that the secretary of DENR submit the first report of recommendations and reorganization, with the first report due no later than Friday, February 23, 2024. We look forward to reviewing and responding to the February report and future reports on this matter.

Sincerely,

Kristi Trail  
Executive Director  
Pontchartrain Conservancy

Amanda Moore  
Director, Gulf Program  
National Wildlife Federation

Lauren Bourg  
Director, Mississippi River Delta Program  
National Audubon Society

Will McDow  
Senior Director, Climate Resilient Watersheds  
Environmental Defense Fund



165. 2/21/24

Dear Governor Landry and Staff:

Please do not merge the Capital Area Groundwater Conservation District with any other entity. This District has the important duty of providing water for the Baton Rouge area of 400,000 people. This task is too important to include it with tasks from other agencies. Citizens need to be able to determine the status of our groundwater and track its use. The USA and normally wet Louisiana experiences of drought in 2023 argue for sole consideration for this important resource. I would remind you that only in February 2024, this month, did the Baton Rouge area move out of Severe Drought status. The 5-6 week period of no rain this past summer (2023) was one of the most awful times of the 52 years I have lived in Baton Rouge. And we can expect more of the same as meteorologists predict less rain more often in the future. The 400,000 or so residents of Baton Rouge need to be able to count on our Baton Rouge Aquifer for our water needs. We will be able to do that best if the Capital Area Groundwater Conservation District remains distinct with the purpose of protecting Baton Rouge's groundwater.

I would also ask that you keep the leadership of that group as it was during Gov. Edwards last year. No water professional or Exxon employee should head this commission, nor should the Conservation District membership be stacked with business representatives primarily. Knowledgeable experts from different areas should be on this board and lead it. I would encourage you to include scientists and environmentalists as well as a member from the Baton Rouge Water Company in addition to some members from the Baton Rouge business community--the head of the Chamber of Commerce, perhaps, or the head of Visit Baton Rouge.

Thank you for your consideration.

Sincerely yours,

Mary Sue Garay

(for my husband and myself)

429 West Woodruff Dr.

Baton Rouge, LA 70808

[Garay2@cox.net](mailto:Garay2@cox.net)

166. February 21, 2024

To: Secretary Tyler Gray

From: Jennifer Coulson, President, Orleans Audubon Society

Re: Executive Order JML 24-13, Possible Incorporation of CPRA in Department of Energy and Natural Resources

Thank you for the opportunity to provide feedback on Executive Order JML 24-13., On behalf of the approximately 1,100 members of Orleans Audubon Society in Southeast Louisiana, I write today to strongly oppose the proposal to move the Coastal Protection and Restoration Authority (CPRA) under the Department of Energy and Natural Resources.

In a nutshell, our argument is simple--"If it ain't broke, don't fix it." Indeed, not only is CPRA not broken, it represents what is arguably the most successful innovation in Louisiana state government in recent decades. CPRA is functioning as a lean, fast moving response to our

state's perilous coastal land loss crisis, mobilizing billions of dollars in the effort to restore our coast and reduce storm risk in our coastal communities. It has been a model for the world, and a shining example of how Louisiana responded to multiple crises with imagination and skill, and by minimizing the cost of getting well-designed, scientifically based, fiscally responsible projects implemented.

Adding another layer of bureaucratic oversight above CPRA will inevitably slow down its work, increase costs, and reduce its effectiveness.

Sincerely,

Jennifer Coulson

President

Orleans Audubon Society

orleansaudubon@aol.com

<http://jjaudubon.net/>

167. **Stakeholder Information:**

Full Name: Andrew C .Wilson

Louisiana Resident: Yes

E-Mail Address: andreww10@att.net

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? CPRA needs to remain an entirely independent entity that controls the decision-making related to coastal restoration and coastal protection by serving as the hub at the center of all the agencies and entities involved with the coast as they address stakeholders and the federal funding sources. The idea of instead creating a large, inefficient, monolithic bureaucracy bedeviled by conflicts of interest, mandates at cross-purposes, "turf wars," and a lack of meaningful administrative oversight, which will be fueled with billions of state and federal dollars and guided only by political goals and special interests, will not serve the people of the State of Louisiana. Such an approach is begging for corruption at the highest level. Huey Long and Edwin Edwards are probably standing up in their respective graves and saluting, rather than rolling over. "It's Déjà vu all over again," as Yogi Berra would say.

How has or may it impacted you? Your organization? I will be impacted if the State washes away. It will hamper if not halt efficient and science-based ongoing coastal restoration efforts. Think of the colossal waste of taxpayer dollars associated with the useless "sand berms" created at the whim of Bobby Jindahl, before CPRA developed some semblance of independence.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? Yes, it is a legal issue. The proposed edict will violate the La. Constitution related to the fundamental doctrine of separation of powers set forth in Art. §1. Three Branches and §2. Limitations on Each Branch. The proposal in the Ex. Order also ignores the fact that many of these individual commissions, agencies, offices, departments and other entities were established by the Legislature. Accordingly, they should only lose their individual status as a result of a well

thought out decision by the Legislature which formed them, after receiving comments in Committee Hearings from the interested stakeholders. To proceed otherwise and simply dissolve them through an edict of the Executive Branch violates the fundamental doctrine of separation of powers and is therefore unconstitutional. In addition the Ex. Order would invade the province of the legislative Branch related to mergers as set forth in Art. IV §20. Appointment of Officials; Merger, Consolidation of Offices and Departments.

Does it fall under existing statutes? Regulations? It falls under La. R.S. 36§1 et seq. in too many areas to include in this small space. The issues relate to reporting, administrative oversight and conflicting mandates. The proposal to combine a number of diverse entities which exist for entirely distinct purposes into one giant monolith recreates all the inefficiencies of the Corps of Engineers on a State level with none of the benefits. In essence the proposed Executive Order would create an administrative "Tower of Babel" with widespread confusion and blockages in communication channels between and among all of the entities that have been thrown together. The proposal is reminiscent of a Soviet "Five-Year Plan" in terms of its inefficient, centralized control but may be even less efficient as it will operate solely on the whim of the Executive Branch and not the wisdom and expertise of the individual commissions, agencies, offices, boards and other administrative entities which will have formerly existed.

#### **Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. In the pre-CPRA era, the mistakes made by both the State and stakeholders which led to the eleven (11) years of litigation (1994-2005) over the Caernarvon freshwater diversion structure and the La. Supreme Court's decision in *Avenal v. State*, 03-3521 (La. 10/19/04); 886 So.2d 1085 present a classic example of how not to proceed in conflict resolution. Without an independent entity such as CPRA to serve as a hub for policy and decision-making, the State's approach which started in the Edwards administration consisted of a series of wildly uncoordinated gestures to the oyster industry and other stakeholders such as large landowners which only served to inflame all private interests. Back then, there was no forum for intelligent, reasoned discussion that is now available with the CPRA, as augmented by the Governor's Coastal Restoration Advisory Commission and the Climate Task Force. Those current forums allow for consensus and conflict resolution.

Did the program your comment concerns change over time? Did it evolve into associated programs? CPRA came into existence as did the Governor's Coastal Commission during the *Avenal* litigation.

Provide historical context and perspective. Policy should not be driven by litigation. While the *Avenal* litigation and related decisions made new law which aided the resolution of the existing coastal conflicts given the finality of the *Avenal* mandate, an atmosphere of productive communication followed between and among the State and the interested stakeholders. That opportunity for consensus will be lost if CPRA and the related commissions are absorbed into the large, state, bureaucratic monolith akin to a "State Corps of Engineers," which is contemplated by the Ex. Order.

#### **Conclusion**

Why should your proposed changes be implemented? What I suggest is no changes, and that all of the entites referenced in the Ex. order remain as is. This will preserve the status quo and the progress made to date, with more on the horizon.

Use specific details to support the case. If CPRA and the other entites referenced in the Ex. order are not left independent , the State's coastal restoration efforts will descend into chaos as the Jindahl administration showed. In those days, the Executive Branch was "calling all the shots" in a haphazard, high-handed and unproductive series of uncoordinated decisions and actions. While CPRA arose out of those ashes, it is a "fine tuned machine" as it is at this time when compared to what the Ex. Order portends.

Reference relevant citations to strengthen your argument. This question is obtuse and makes no sense. Perhaps reference to the failures of the historical Soviet 5 year plans and the bureaucratic monoliths in Russia, North Korea, and China ove the past 8 decades through th eprent should provide ample and appropriate analogies.

#### **Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual,In-Person

168. The proposal to combine a number of diverse entities which exist for entirely distinct purposes into one giant monolith recreates all the inefficiencies of the Corps of Engineers on a State level with none of the benefits. In essence the proposed Executive Order would create an administrative "Tower of Babel" with widespread confusion and blockages in communication channels between and among all of the entities that have been thrown together. The proposal is reminiscent of a Soviet "Five-Year Plan" in terms of its inefficient, centralized control. But, as proposed, it may be even less efficient as it will operate solely on the whim of the Executive Branch with little or no input from outside, and not the wisdom and expertise of the individual commissions, agencies, offices, boards and other administrative entities which will have formerly existed.

Further, if combined, the conflicting mandates of these individual entities will inevitably lead to conflicts of interest given the differing purposes of each. These entities were created to focus on particular subject matters and issues. By design, their individual mandates were and are intended to focus their efforts on specific goals which may conflict with other entities' mandates, thus triggering decisions based upon compromise and consensus, rather than pre-determined outcomes. If combined into one entity, that opportunity for individual focus will be lost. In the same vein, with regard to the commissions created by the Executive Branch, these were intended to allow for more public participation and to assist in decision-making. If they are absorbed into the new monolith, any progress made to date by these commissions and their findings will be lost to history, rendering all of their efforts through the years, a colossal waste of time.

The proposal in the Ex. Order also ignores the fact that some of these individual commissions, agencies, offices, departments and other entities were established by the Legislature. Accordingly, they should only lose their individual status as a result of a well thought out decision by the Legislature which formed them, after receiving comments in Committee Hearings from the interested stakeholders. To proceed otherwise and simply dissolve them through an edict of the Executive Branch violates the fundamental doctrine of separation of powers and is therefore unconstitutional. More specifically, the proposed Ex. Order will

violate the La. Constitution and the fundamental doctrine of separation of powers set forth in Art. §1. Three Branches and §2. Limitations on Each Branch. In addition, the Ex. Order would invade the province of the legislative Branch related to mergers as set forth in Art. IV §20. Appointment of Officials; Merger, Consolidation of Offices and Departments. Also worthy of note is that the Ex. Order triggers many concerns in La. R.S. 36 §1 et seq. in too many sections to include or list in this brief comment. These concerns relate to reporting, administrative oversight and conflicting mandates.

Finally, these entities referenced in the Ex. Order exist because they possess special expertise due to their intimate association with the narrow subject matter that is theirs to consider according to their respective mandates established when they were created. Combining them together into one massive amalgam will dilute their effectiveness and render them useless as well as irrelevant. And “politics as usual” will prevail with all decisions being made by and for the benefit of the Executive Branch. Huey Long is probably standing up in his grave and applauding, rather than rolling over. “It’s Déjà vu all over again,” as Yogi Berra would say.

Andrew Wilson

[Andreww10@att.net](mailto:Andreww10@att.net)

169. Secretary Gray,

Please see the attached document for comments regarding Executive Order JML-13 on behalf of the National Audubon Society.

Thank you,

Lauren C. Bourg

Director

Restore the Mississippi River Delta

225.776.9838 (c)

Audubon Delta

3801 Canal Street, Suite 400

New Orleans, LA 70119

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February 21, 2024

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Office of the Governor  
PO Box 94004  
Baton Rouge, LA 70804

**Re: Executive Order JML-13: Consolidation of Natural Resources and Energy Related Executive Branch Functions, Powers, Duties, and Responsibilities**

Dear Secretary Gray:

The National Audubon Society (Audubon) appreciates the opportunity to provide comments regarding the proposed consolidation and reorganization of specific offices and agencies, including the Department of Energy and Natural Resources, Coastal Protection and Restoration Authority, the Louisiana Oil-Spill Coordinator's Office, and the Office of State Lands. Audubon protects birds and the places they need, today and tomorrow, through the Americas using science, advocacy, education, and on-the-ground conservation.

Our organization advocates against merging the Coastal Protection and Restoration Authority (CPRA) with the Department of Energy and Natural Resources, as we believe it would introduce unnecessary bureaucracy and potentially hinder project progress, which could adversely affect coastal communities. CPRA should remain a stand-alone, independent entity prominently seated at the forefront of state government.

Audubon has a long history of conservation work in Louisiana. For a full century, our ownership of the 26,000-acre Paul J. Rainey Wildlife Sanctuary in southwest Louisiana has made Audubon a stakeholder with real interests and concerns over the health and sustainability of this landscape.

As the fourth-largest river system in the world and a major North American flyway, the Mississippi River serves as a hemispheric superhighway for migrating birds, and for shipping and commerce. The river contributes \$400 billion to the U.S. economy each year and provides a home for over 12 million people within the basin.

However, Louisiana's coastline—including the incredibly valuable and productive Mississippi River Delta—is vanishing at an alarming rate. We're losing a football field of wetlands every 100 minutes, while also facing more frequent and intense storms. We must continue to prioritize the restoration of our coast and protection of our communities for both people and birds. Over 350 species of birds use parts or all of the Mississippi River basin during their annual life cycle, 20 percent of which are listed as continental or regional birds of conservation concern. This includes migratory shorebirds like the Least Tern that nests along the Gulf Coast and on sandy river flats in Missouri and Mississippi, and the Prothonotary Warbler that nests in tree cavities throughout the region's floodplain forests.

As a Restore the Mississippi River Delta Coalition member, Audubon partners with the National Wildlife Federation, the Environmental Defense Fund, Coalition to Restore Coastal Louisiana, and Pontchartrain Conservancy to advance a just, climate-resilient coast where people and nature thrive. For Audubon, this is a priority as the Mississippi River Delta ecosystem and coastal Louisiana support 100 million migratory, nesting, and wintering birds. Protecting and restoring this vital habitat is crucial to the health and survival of many of these species.

The National Audubon Society and our regional office, Audubon Delta, has worked alongside the Coastal Protection and Restoration Authority (CPRA) for 17 years to contribute our technical, community outreach, communications, and policy expertise to the cause of coastal restoration.

Throughout this period, Audubon and our coalition partners have played diverse roles in various partnership capacities, such as serving on advisory and technical working groups for Coastal Master Plan processes, the Governor's Advisory Commission, and consistently supporting coastal funding initiatives. Our advocacy endeavors aim to inform key

stakeholders, promote broad engagement, and offer public, technical, and policy support. The effectiveness of our efforts largely hinges on the accessibility and responsiveness of CPRA, facilitated by its independent structure. Ultimately, this collaboration benefits both the coast and our communities, representing a mutually advantageous outcome.

Focusing on coastal priorities aligns precisely with the desires of the Louisiana public. According to a 2023 poll, 84 percent of Louisiana voters expressed support for lawmakers who support taking strong action to protect and restore their state's coastal areas and wetlands. Additionally, most Louisiana voters endorse the state's approach to addressing the land loss crisis, with 92 percent recognizing the importance of implementing a comprehensive plan to deal with land loss using the latest science.

It is clear that Louisiana's coastal program works. For more than two decades, Louisiana's executive and legislative branches have supported a unified effort to prioritize coastal protection and restoration through the CPRA. This effective agency, with a modest staff of just 180 members, has utilized over 1 billion dollars annually to implement restoration and protection projects. This effort has seen significant achievements, including completing 157 projects, benefiting 82 square miles of coastal wetlands, improving 358 miles of levees, and building 60 miles of barrier islands.

Public support for the coastal program remains emphatic with polls showing 95 percent in support of working to maintain as much coastal land as possible. The legislature has also shown unanimous support for the 2007, 2012, 2017, and 2023 coastal master plans.

Coastal projects not only mitigate risks to communities and safeguard vital economic sectors, but also preserve ecosystems crucial for Louisiana's culture, recreation, and tourism industries, generating job opportunities and economic growth. For example, the projected outcomes of the 2023 Coastal Master Plan indicate a significant economic impact, expected to prevent annual damages totaling between \$10.7 billion and \$14.5 billion. Additionally, the plan is anticipated to generate nearly 11,000 direct employment opportunities, with a combined labor income exceeding \$651 million.

We also emphasize the importance of incorporating public input into this process and urge thorough consideration before any decisions are finalized. Communities are deeply involved and committed to this endeavor, making their input indispensable and deserving of careful consideration.

Overall, the proposed projects outlined in the 2023 Coastal Master Plan would prevent significant loss of wetlands, economic damages, and protect thousands of homes and businesses. CPRA is one of the most effective, efficient, science-backed, and publicly supported agencies the state has in its arsenal for fighting the coastal land loss crisis.

There are no doubts that CPRA and its support structures remain essential, effective, and relevant in addressing the ongoing coastal crisis. The Louisiana Coastal Program was specifically created to draw attention to the urgent need to address coastal issues, and any attempts to reorganize it would divert focus from its critical mission.

The land loss challenges facing coastal Louisiana must be met with robust restoration and protection efforts from a stand-alone, independent entity if the region is to remain a safe haven for people and birds alike.

Sincerely,

A handwritten signature in cursive script, appearing to read "Brian Moore".

Brian Moore  
Vice President, Coastal Policy  
National Audubon Society



170. Secretary Gray,

Please see the attached document for comments regarding Executive Order JML-13 on behalf of Restore the Mississippi River Delta Coalition.

Thank you,

Lauren C. Bourg

Director

Restore the Mississippi River Delta

225.776.9838 (c)

Audubon Delta

3801 Canal Street, Suite 400

New Orleans, LA 70119

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# RESTORE

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February 21, 2024

Office of the Governor  
PO Box 94004  
Baton Rouge, LA 70804

**RE: Executive Order JML-13: Consolidation of Natural Resources and Energy Related Executive Branch Functions, Powers, Duties, and Responsibilities**

Dear Secretary Gray,

We are writing on behalf of four members of The Restore the Mississippi River Delta Coalition, the Environmental Defense Fund, National Audubon Society, the National Wildlife Federation and Pontchartrain Conservancy. Together, we have worked with the Coastal Protection and Restoration Authority since its very early days to bring technical, community outreach, communications and policy expertise to the cause of coastal restoration. During this time, our coalition members have served in a wide array of partnership roles, including advisory and technical working groups for Coastal Master Plan processes, Governor's Advisory Commission, and as a regular supporter of coastal funding initiatives. Our advocacy efforts educate key stakeholders, ensure widespread engagement and provide public, technical and policy support. This work is most effective, largely due to the accessibility and responsiveness of CPRA made possible through its standalone structure. It is a win-win for the coast and for our communities.

Over the years, Restore the Mississippi River Delta (MRD) and Louisiana's Coastal Protection and Restoration Authority (CPRA) have had many successes across coastal Louisiana. The MRD acts as a key point of connection to CPRA's work—most notably the Coastal Master Plan – for thousands of coastal stakeholders, ranging from community leaders to business interests to sportsmen. With CPRA, we have helped provide logistical and content support for hundreds of community conversations and other public meetings throughout the state about the Coastal Master Plan and its projects, like sediment diversions, so the public can enter dialogue directly with CPRA leaders. The MRD also coordinates with CPRA on federal opportunities – helping to guide the U.S. Army Corps of Engineers (USACE) since 2007 on the Mississippi River-Gulf Outlet ecosystem restoration and advocating for RESTORE Act implementation and project selection. Working together, we have protected billions of dollars in secured funding for restoration and protection projects, continue to explore new options and finance mechanisms to secure future funds and have identified and successfully advocated for innovative cost-saving strategies for project mitigation (e.g., mobilized public support and coordinated with the USACE and CPRA to secure the CPRA Maurepas freshwater diversion as the mitigation for the USACE West Shore Lake Pontchartrain levee project).

For over 20 years, four Louisiana governors and the Louisiana Legislature have recognized the centrality of the coastal crisis to the safety, prosperity and future of coastal Louisiana. They have passed legislation, enacted policies and supported constitutional amendments to enable a single state entity to prioritize Louisiana's coastal protection and restoration efforts in a comprehensive and principled manner.



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Louisiana's Coastal Protection and Restoration Authority (CPRA) is now the standard bearer for national efforts to protect people, assets and the natural environment from the threats of hurricanes and sea level rise. The program that has evolved is supported by countless advocates from a diverse group of stakeholders including community groups, industry, environmental organizations and business interests. CPRA's nationally and internationally recognized accomplishments are the result of the agency's singular focus on coastal protection and restoration work, and their commitment to science-based planning, proven track record of project implementation and wide-ranging support from the public and stakeholders is still evident and relevant today. Despite Louisiana's laudable accomplishments, the coastal crisis is as serious and dire as ever.

The CPRA exemplifies effectiveness and efficiency in state government. Over the last few years, the CPRA has delivered record-breaking levels of investment in largest-of-their-kind projects that have protected communities, preserved and restored ecosystems and both guarded and spawned economic activity. Since 2007, CPRA has completed 157 projects, benefiting 55,000 acres of coastal wetlands, improving 370 miles of levees and constructing 70 miles of barrier islands. Other states and countries are looking to Louisiana as a model for approaching an existential climate and land loss crisis. CPRA's science-based planning and project implementation expertise is the gold standard for facing the growing environmental threats facing coasts everywhere.

Moving the restoration and protection functions currently housed at CPRA under the Department of Energy and Natural Resources (DENR) would dilute and diminish the importance of the coastal crisis by diminishing the agency's status as a standalone, independent entity prominently seated at the forefront of state government. This proposed change in structure would be a misguided and ill-timed de-prioritization of an issue that still demands the state's attention at the highest levels. While the structure of the state's coastal program came into being nearly 20 years ago following the devastation of Hurricanes Katrina and Rita, the record storm seasons of 2020 and 2021 provide fresh evidence of the urgency and severity of the threats facing coastal communities across Louisiana—and the incredible impact of restoration and protection measures implemented to date by the CPRA that lessened the severity of the impacts of those storms on the landscape. The state's own projections warn of a coast facing increasing challenges of land loss and storm surge risk in the future, warnings supported by the world's leading scientists.

The successes of the coastal program are the product of a lean and focused organization that leverages around \$25 million of state mineral revenues into an over-\$1-billion-a-year construction program that benefits every community along the coast and the entire state. Louisiana's coastal program was specifically designed to highlight and focus state and national attention on a matter of extreme urgency and consequence for the future of Louisiana. Any attempt to reorganize this efficient and essential part of Louisiana's government risks distraction from the critical mission at hand.

The following specific comments and examples illustrate this position further.

### Origins of the Coastal Program

The coastal program evolved from the late 1970s and 1980s through the creation of the Coastal Resources Program (followed by the federally approved Coastal Zone Management Program, 1980) and the Office of Coastal Restoration and Management program and fund (1989). Congress passed the Coastal Wetlands Planning Protection and Restoration Act



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(CWPPRA) in 1990, bringing much-needed federal funding into the equation for coastal wetlands protection at that time. These efforts, housed within the Department of Natural Resources, coupled with levee management under the Department of Transportation and Development public works section, proceeded separately into the early 2000s.

Following the devastating 2005 hurricane season, Congress and the Corps of Engineers demanded a single state entity as their partner for rebuilding, managing, and operating and maintaining the construction of the New Orleans Area Hurricane Storm Damage Risk Reduction System. The engineering and science community also agreed through a variety of papers and reports in 2005 and 2006 that the key to Louisiana's future success would hinge on the integration of existing but disparate agency functions into one cohesive organization whose sole purpose was the restoration and protection of Louisiana's fragile coast.

In response, state leaders crafted the unique structure of the CPRA board and implementation office (see further details below) to specifically address the prior deficiencies in governance exposed by Hurricanes Katrina and Rita. Prior to the creation of CPRA, the state lacked a single, comprehensive vision for the protection and restoration of the coast. Both the Department of Natural Resources and the Department of Transportation and Development routinely engaged Congress and other stakeholders with competing interests relating coastal issues, and the oversight responsibilities for maintenance of the standards and operations of levee systems was not centralized.

The creation of CPRA within the Office of the Governor from portions of the Department of Natural Resources and portions of the Department of Transportation and Development gave an existential issue facing the entire coast the highest priority and visibility within the state. It established a single entity with the responsibility and authority to address the coastal crisis; it empowered it to efficiently and clearly engage with federal partners and Congress to expedite the completion of the GNO HSDRRS; and it instituted the development of a systematic and comprehensive approach to managing and responding to a crisis that involves multiple state agencies, natural resources, stakeholder groups and communities.

Disengaging these issues from existing departments and creating a new state agency took multiple pieces of legislation over years, including reauthorizations, allowing several different points to examine its effectiveness and efficiencies.

### **The Nature of the Coastal Crisis**

The nature of the coastal problem is one of both increasing land loss and rising storm surge flood risk, and whose implications are all-encompassing. With direct and indirect consequences of this crisis intersecting the authorities and expertise of multiple state and federal entities, the Governor's Office and the multi-agency and regionally representative CPRA Board are uniquely suited to oversee and manage a coordinated state response. Rather than being "isolated unnecessarily," Louisiana's coastal program was specifically designed to highlight and focus state and national attention on a matter of extreme urgency and consequence for the future of Louisiana. Since 2005, CPRA has successfully led the implementation of critical projects to protect and restore the coast. Despite these efforts, risks to Louisiana's coast remain high today and are projected to increase in the future. Given the continued threat, the highest levels of the executive branch should remain intently focused on maintaining CPRA's positive momentum.





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### Emergency Response Function

Coordination and consistency across agencies and across levels of government is essential during and immediately after natural disasters. CPRA excels at providing clear and consistent communication, resources and support to local governments, local levee districts and other state agencies during tropical weather and major flooding events.

This element of CPRA's structure represents a direct reform following the disasters of Hurricanes Katrina and Rita when *Hurricane Katrina: a Nation Still Unprepared*, a special report of the Committee on Homeland Security and Government Affairs, found that "neither LA DOTD nor any state agency made sure that the state's levee districts were integrated into the state's emergency-planning process, much less genuinely prepared for an emergency. As a result, when Katrina made landfall, no Orleans Levee District personnel were located at, or in contact with, emergency managers in Baton Rouge; nor was any mechanism in place to request additional support from the state." The committee also found that in the immediate aftermath of Katrina, "resolving the dispute over who was in charge of the repair effort and the full-scale efforts to fill the breaches took three days. No such dispute should have occurred, and resolution should not have taken so long. Responsibilities among the levee districts, the LA DOTD, and the Corps should have been understood and documented...In the end, neither the Corps, the LA DOTD, nor the levee districts had any plan in place, nor had they determined or planned in advance who would be responsible for, and have the assets nearby, to address a major breach of the levees or floodwalls."

Today's CPRA is a well-oiled response machine that knows and serves its emergency roles and functions. Staff is integral to the Unified Command Group response group allocated to the Emergency Operations Center during natural and technical disasters, providing resources such as modeling and engineering expertise, commanding logistics supports for local parishes and flood authorities, and providing support to other agencies and emergency responders, leveraging strong relationships with local officials, the congressional delegation and even the USACE to expedite response and recovery. Changes to the structure of CPRA should not hinder its successful emergency response role.

### Public Support for CPRA and the Coastal Master Plan

Since the passage of Act 8 of the First Extraordinary Session of 2005, the residents of Louisiana have benefited from a single voice and single point of entry for engaging with the state on coastal protection and restoration issues. Over the course of nearly 20 years, people, businesses and organizations inside and outside of Louisiana have learned to engage with the CPRA through its monthly board meetings, Governor's Advisory Commission meetings, Coastal Master Plan and Annual Plan processes and public meetings, and other direct points of engagement with program staff.

The consistent public engagement and education efforts coupled with aggressive project implementation have garnered tremendous public support for the state's coastal program. Bipartisan polling conducted by our organizations in 2023 showed that 95 percent of respondents support working to maintain as much coastal land as possible. Louisiana voters also largely approve of how the state is tackling its land loss crisis, with 92 percent agreeing it is important to have a comprehensive plan (the Coastal Master Plan) to deal with land loss using the latest science. This public support has been echoed by the state Legislature with unanimous passage of the 2007, 2012, 2017 and 2023 Coastal Master Plans.



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Our coalition has directly engaged citizens hundreds of thousands of times in CPRA coastal processes. Consolidating the functions of CPRA within DENR will create confusion for voters familiar with the CPRA, its projects, plans and programs. The value of this support translates into supportive comments, letters, and advocacy that help to secure federal funding, Army Corps of Engineers projects in Louisiana, and other grants and opportunities that benefit Louisiana's coast.

### Maximizing Funding for the Coast

CPRA is a highly efficient and effective organization that receives virtually no funding from the state's general fund. Relying on between \$5 million and \$25 million of annual support in the form of mineral revenues (i.e. not general taxpayer funds), the CPRA and its roughly 180 employees regularly oversee and implement a \$600 million to \$1.7 billion comprehensive program of protection and restoration projects. The Annual Plan proposed for FY25 lists \$1.68 billion in expenditures with \$1.32 billion allocated to construction with recurring state dollars representing a mere 1.5% of CPRA's projected revenues. This level of annual spending produces nearly 11,000 direct jobs with a labor income of \$560 million, according to our partners at GNO, Inc. Job creation and labor income multiplies with indirect jobs and does not include the billions of dollars of funding directed to the New Orleans District of the Army Corps of Engineers for its current portfolio of projects.

There can be no "wiser use of state funds" than to allow a program that consistently utilizes fewer than \$25 million of state funds to draw down over a billion dollars of nonstate revenues for a construction program that provides billions of dollars of benefits to the people, economy and natural resources of the state.

### "A Better Business Climate"

One of the stated goals in EC JML 2024-13 is to create a "better business climate" for industry and the DENR. The singular focus of the state's coastal program streamlines engagement, concentrates expertise, and provides clear and direct avenues for private sector engagement through transparent and consistent processes and timelines. Moreover, the coastal program has excelled at partnering with other state agencies, business groups and the private sector to encourage and grow workforce opportunities, economic development opportunities, and generally maximize the economic impacts of investments in the protection and restoration of Louisiana's coast through activities like Industry Day, their partnership with the Louisiana Workforce Commission around the Louisiana First Hiring Act, and their partnership with Louisiana Economic Development that created the Coastal Technical Assistance Center (CTAC).

The surest route to a better business climate in Louisiana is to address the perception and reality of Louisiana's coastal risk. CPRA consistently invests (almost exclusively) federal and private (oil spill settlement) funds in proven, science-backed, proactive projects that protect communities and ecosystems against the risks from rising sea levels and hurricane storm surge.

### Contracts and Legal Questions

Since its inception, the CPRA has penned countless contractual agreements with parties such as the U.S. Army Corps of Engineers (Corps), U.S. Department of Justice, Louisiana Trustee Implementation Group (TIG), the RESTORE Council, National Fish and Wildlife Federation (NFWF), landowners across the coastal area and many others under its "single state authority" designation to implement hurricane protection and restoration projects in the coastal area.



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No longer a new agency, CPRA currently benefits from the efficiencies garnered from the considerable investment of time and effort to establish its contracting authority following its creation from portions of DNR and DOTD. To move CPRA back under DNR could add additional layers of contract review, approval and process that could cost time and create a burden for the DENR Office of the Secretary. Should DENR assume contracting on behalf of CPRA, it will be forced to balance the priorities of executing coastal construction contracts with other energy or coastal management contracts. More concerning is the potential that this change in contracting authority would trigger hundreds of amendments (and potentially requests to renegotiate) on existing contracts, sending contracts currently in process into limbo until they can be redrafted under a new system.

Contracts are but one example of a myriad of unnecessary administrative tasks and functions (like human resources, IT, specialized legal defense and accounting) that will be necessitated to undo a merger of agency functions, a waste of time and energy that is better spent on implementing projects.

### **Compatibility with DENR Mission and Natural Resources Management**

The core mission of the DENR is “to ensure and promote sustainable and responsible use of the natural resources of our state so that they are available for the enjoyment and benefit of our citizens now and in the future.” Article IX of the Louisiana Constitution further notes that “the natural resources of the state, including air and water, and the healthful, scenic, historic and aesthetic quality of the environment shall be protected.” While the terms “resources” and “use of natural resources” noted in the mission statement are broad, and while they may give a passing nod to protecting wetlands, none of this terminology applies to the types of infrastructure and engineering required in the implementation and oversight of hurricane protection systems. Floodgates, levees, floodwalls and the like are not a similar service offering to traditional activities of the DENR. This is an unnatural fit that underscores the very reasons that DNR and DOTD staff were molded into the original CPRA rather than being absorbed within DNR nearly 20 years ago.

Additionally, DENR is not now and has never been a public works entity. The original functions and services taken from the Department of Transportation and Development to create CPRA are a linchpin of the organization’s work. DOTD still manages river levees and other flood response activities outside of the coastal area and maintains familiar partnerships with CPRA when needed. Placing CPRA under the DENR would create stovepipes and distance between these entities that could cause unnecessary challenges in communication and efficiency.

### **Permitting and Regulatory Enforcement**

A balanced approach to permitting, enforcement and management practices related to the state’s fragile coast requires the separation of decisions relating to the permitting of activities along the coast from those related to the protection and restoration of that coast. Permitting requires managing regulatory relationships with industry and other users that are different from and detrimental to the types of partnerships required to advance restoration or protection projects.

DENR issues and enforces permit requirements as a function of the Office of Coastal Management under the purview of the Office of Assistant Secretary. CPRA is an implementation agency that develops, oversees and implements a





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scientifically based Coastal Master Plan. The current permitting process requires minimal input from CPRA through a check for inconsistency and does not delay the approval process.

Putting CPRA under DENR would place it within the agency responsible for regulating coastal use permits. This conflict was deliberated in the past, and the determination, supported by both industry and coastal stakeholders, was that these functions should remain housed in separate agencies.

### **Additional Comments Related to Coastal Boards and Commissions**

Reflection on the implications of the coastal crisis reveals that the issues, the science and the stakeholders are too diverse and important to be relegated to a single state agency or single monthly board meeting. Additional boards and commissions dedicated to coastal issues provide space to hold deeper and more specific conversations that can better inform decision-makers, interest groups and the public about potential projects or policies.

The Governor's Advisory Commission on Coastal Protection, Restoration, and Conservation is explicitly designed by the Legislature to collect input from and disseminate information to a wide range of stakeholders impacted by the coastal crisis and the state's response. Diminishing or eliminating this outlet for quality information and discussion would do a disservice to the complexity of the coastal issue and the different people and groups who are invested in shaping the state's response.

Specially established boards, commissions or advisory panels can serve critical roles in finding common ground and formulating policy responses to complex issues that affect multiple government agencies, economic sectors or communities.

Government efficiency is not improved when a highly effective and transparent agency is buried under additional layers of bureaucracy and oversight at an already large state agency with many responsibilities of its own. Furthermore, consolidating the functions of CPRA within DENR would create, not eliminate public, industry and governmental confusion when it comes to the state's efforts to combat the coastal crisis.

The CPRA and the structures that support it are still as vital and essential as ever. The reforms established in the aftermath of Hurricanes Katrina and Rita are working as intended or properly formulated to address the continuing and existential nature of the coastal crisis. Rather than being "isolated unnecessarily," Louisiana's coastal program was specifically designed to highlight and focus state and national attention on a matter of extreme urgency and consequence for the future of Louisiana.

In conclusion, the state's coastal program is already an expression of government efficiency in that it was formed by consolidating disparate functions of two separate agencies to achieve better outcomes related to comprehensive planning, project implementation and securing federal funding and policy support. The state's response to the coastal crisis, with impacts and implications that cross the authorities and expertise of multiple state and federal entities, is better served by the Governor's Office and the multi-agency and regionally representative CPRA Board than a subsidiary of a single state agency.





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Finally, Executive Order JML 2024-13 requires that the secretary of DENR submit the first report of recommendations and reorganization, with the first report due no later than Friday, February 23, 2024. We look forward to reviewing and responding to the February report and future reports on this matter.

Sincerely,

Kristi Trail  
Executive Director  
Pontchartrain Conservancy

Amanda Moore  
Director, Gulf Program  
National Wildlife Federation

Lauren Bourg  
Director, Mississippi River Delta Program  
National Audubon Society

Will McDow  
Senior Director, Climate Resilient Watersheds  
Environmental Defense Fund



171. Good Afternoon,

I am a Louisiana homeowner facing rising flood and home insurance costs due to my local and federal government's failures to address man-made coastal erosion. Louisiana is at an historic moment. It is not hyperbolic to say that what we do next will determine the fate and survival of our state. If you live in Louisiana, regardless of how you identify politically, there is no denying our coastal land loss. This was a dire and well known crisis when Republican Governor Mike Foster was in office in 1995, and it is an even more dire and well known crisis now that Republican Governor Jeff Landry is in office in 2024. This is a settled reality.

The Coastal Protection and Restoration Authority (CPRA) is Louisiana's primary weapon in the fight against coastal land loss. The CPRA was created by a bipartisan legislature under Republican Governor Bobby Jindal in response to Hurricane's Katrina and Rita, storms that would not have been so catastrophic had Louisiana not lost so much land to man-made coastal erosion.

Unfortunately, Governor Jeff Landry has revealed himself to be on the side of coastal erosion. His Executive Order JML-13 seeks to move CPRA offices out of the governor's office, and consolidate it with the notoriously corrupt state agency the Department of Energy and Natural Resources (DENR).

Landry wants to REDUCE the size of the already meager 21-person CPRA board of directors and the 35-person Governor's Advisory Commission on Coastal Protection, Restoration and Conservation. This move will weaken the sole government entity tasked with saving Louisiana's coasts.

Coastal restoration must be front and center of any Louisiana civic agenda, and robustly funded by the two entities responsible for Louisiana's land loss: our government and the oil and gas industry. Louisianans pay for our government's failure to fix our coast year after year with blue roofs, flooded homes, and exorbitant insurance costs. It seems that Governor Landry wants us to pay more.

The enemy is at the gates and washing away our land. The governor is proposing that we pay the enemy to take more of our land. We must unite in the fight to save southern Louisiana. We must not reduce the CPRA, but expand it to include more Louisianans ready to rebuild our coasts.

Louisiana public policy expert Megan Milliken Biven has proposed more muscular strategies to make progress on our fight to save southern Louisiana from future land loss: 1) work with the Department of the Interior to fully remove decommissioned in place pipelines on our coast, 2) lead the fight to restore our public dredge fleet, 3) be a leading negotiator at the Lower Mississippi River Comprehensive Management Study. Louisiana must place priority on participating in this process and advocate for the overall health of the Mississippi River Basin, 4) Put Louisianans back to work plugging oil and gas wells and refilling pipeline canals.

This moment in history demands much of us. Please legislate knowing our state's fate depends on what your administration does next.

Evan Sipher

[evansipher@gmail.com](mailto:evansipher@gmail.com)

172. Dear DENR Team,

Please find the attached public comment, on behalf of Greater New Orleans, Inc. and our Coalition for Coastal Resilience and Economy (CCRE). We appreciate the opportunity to comment and your review.

Thank you,

Peter

Peter Waggoner

Public Policy Director

Greater New Orleans, Inc.

1100 Poydras Street, Suite 3475

New Orleans, LA 70163

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[www.gnoinc.org](http://www.gnoinc.org)

504.527.6980



10 PARISHES  
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St. James  
St. John the Baptist  
St. Tammany  
Tangipahoa  
Washington

February 20, 2024

Submitted via email to [driveinitiative@la.gov](mailto:driveinitiative@la.gov)

RE: Public Comment on Executive Order JML-13

Dear Secretary Gray,

Greater New Orleans, Inc. (GNO, Inc.) is the regional economic development organization for ten parishes of Southeast Louisiana. GNO, Inc. appreciates Governor Landry's interest in creating substantial growth for Louisiana industries and optimizing various offices, agencies, and authorities. GNO, Inc. also values your work to coordinate and champion the State's energy and natural resources through your leadership of the Department of Energy and Natural Resources (DENR) and this specific review process.

For GNO, Inc., economic development and coastal restoration are mutually dependent. By investing – philosophically, legislatively, and financially – in restoring the coast, we believe that we can better protect and promote existing and future investment throughout Louisiana. A resilient coast supports our economy agnostically across key sectors, from to trade and logistics to energy. Our coast protects critical facilities, infrastructure, and assets that are uniquely located in Louisiana, yet have downstream implications on the national and global economies. Accordingly, GNO, Inc. is deeply vested in ensuring that we have a sustainable and resilient coastal environment. In hand, GNO, Inc. has a history of collaboration with the Coastal Protection and Restoration Authority (CPRA).

Ten years ago, recognizing the absence of a unified voice from the greater business community advocating for coastal restoration, GNO, Inc. established the Coalition for Coastal Resilience and Economy (CCRE). This neutral, nonpartisan group of business leaders from Southeast Louisiana acts as an informed voice to advance the resilience of coastal Louisiana's wetlands, rivers, deltas, and their associated economic benefits. CCRE is a business-led group whose mission is to:

- Support the full adoption and implementation of the Louisiana Coastal Master Plan;
- Advocate for maintenance of existing and enactment of new revenue streams (e.g., GOMESA, RISEE Act, Coastal Carbon Markets);
- Market the business case for coastal restoration in Louisiana; and
- Create opportunities to engage local business and workforce in the Master Plan's implementation

GNO, Inc. and CCRE have experienced and underscored the tangible economic impacts of CPRA's work. In FY25 alone, we project that Annual Plan implementation will support 10,983 direct jobs and \$651,402,323.28 in labor income. To maximize Master Plan implementation's economic benefits within Louisiana, GNO, Inc. hosts "Securing Coastal Contracts" workshops and webinars, in partnership with CPRA, the Coastal Technical Assistance Center (CTAC), and additional technical assistance providers. These sessions are oriented towards disadvantaged business enterprises, with the goal of using coastal contracting to grow generational wealth and Louisiana-based private sector expertise.

In fact, CPRA was originally authorized with economic impacts in mind. Act 8 of the 2005 First Extraordinary Session states, "The state must have a single agency with authority to articulate a clear statement of priorities and to focus development and implementation of efforts to achieve comprehensive coastal protection. Without this authority, the safety of citizens, the viability of the state and local economies, and the long-term recovery from disasters such as Hurricanes Katrina and Rita remain in jeopardy." Furthermore, CPRA, by law,

considers economic impacts of projects within the Master Plan: “Where feasible, the comprehensive master plan shall include scientific data and other reasons, including but not limited to the social, geographic, economic, engineering, and biological considerations as to why each project or program was selected for inclusion.”

Stability for CPRA is important to sustain economic impacts of coastal projects and deliver on commitments of the 50-year, \$50B 2023 Coastal Master Plan, as unanimously approved by the Louisiana State Legislature. The FY25 Annual Plan – just like the FY22, FY23, and FY24 annual plans – proposes a record-breaking expenditure, project scale, and economic impact. This progress reflects CPRA’s consistent effectiveness and efficiency.

CPRA’s Master Plan expresses a collective responsibility of “coordinated action from our state, federal, and local government partners, and various other stakeholders including non-governmental organizations, business, industry, and academic and research.” CPRA has fostered partnerships with local governments, working together on local, non-state projects. Furthermore, CPRA has a working relationship – and formal agreements as a local sponsor – with the U.S. Army Corps of Engineers (USACE). Now, USACE is expending a record amount and has various projects affecting Coastal Louisiana in various stages, like the MRGO Ecosystem Restoration project, the West Shore Lake Pontchartrain project, and levee lifts for Lake Pontchartrain & Vicinity and West Bank & Vicinity. Any change in authority should ensure that new and existing funding sources – including federal appropriations, Louisiana Trustee Implementation Group (LA TIG), and National Fish and Wildlife Foundation (NFWF) – are not jeopardized. This is particularly important in the face of a coastal fiscal cliff, anticipated in 2032, which must be avoided through intentional education and prudent prioritization.

There is hope for Louisiana’s coast. Louisiana has been losing coastal wetlands since at least the 1930s, with the leveeing of the Mississippi River and the subsequent starvation of sediment supply. But, the long-term rate of land loss has slowed since its peak in the 1970s and has further slowed since 2010. Projects like the Mid-Barataria Sediment Diversion will restore sediment supply, and cumulatively, implementing all projects identified in the 2023 Coastal Master Plan could make our coastal communities less vulnerable to tropical storms and hurricanes in 50 years than they are today.

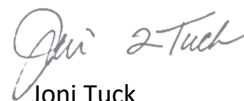
Still, it is worth underscoring the unique need for prioritizing coastal investments in Louisiana. Since the 1930s, Louisiana has lost over 1 million acres or 2,000 square miles of land, an area larger than the State of Rhode Island and about the size of the State of Delaware. Louisiana accounts for 80% of the nation’s coastal land loss, and we are often cited as having the highest rates of land loss in the world.

Thus, it’s critical to consistently and urgently advance Coastal Master Plan implementation, which not only creates direct jobs, but supports all jobs across Louisiana. GNO, Inc. and CCRE recognizes the vital roles that CPRA and DENR both play to support our environment and economy, with reliability and continuity for public and private sector partners. In conclusion, we appreciate the opportunity to comment and the Landry Administration’s care for coastal Louisiana, considering its symbiotic relationship with economic development.

Sincerely,



Michael Hecht  
President & CEO



Joni Tuck  
CCRE Chair

173. Good Afternoon,

I am a Louisiana homeowner facing rising flood and home insurance costs due to my local and federal government's failures to address man-made coastal erosion. Louisiana is at an historic moment. It is not hyperbolic to say that what we do next will determine the fate and survival of our state. If you live in Louisiana, regardless of how you identify politically, there is no denying our coastal land loss. This was a dire and well known crisis when Republican Governor Mike Foster was in office in 1995, and it is an even more dire and well known crisis now that Republican Governor Jeff Landry is in office in 2024. This is a settled reality.

The Coastal Protection and Restoration Authority (CPRA) is Louisiana's primary weapon in the fight against coastal land loss. The CPRA was created by a bipartisan legislature under Republican Governor Bobby Jindal in response to Hurricane's Katrina and Rita, storms that would not have been so catastrophic had Louisiana not lost so much land to man-made coastal erosion.

Unfortunately, Governor Jeff Landry has revealed himself to be on the side of coastal erosion. His Executive Order JML-13 seeks to move CPRA offices out of the governor's office, and consolidate it with the notoriously corrupt state agency the Department of Energy and Natural Resources (DENR).

Landry wants to REDUCE the size of the already meager 21-person CPRA board of directors and the 35-person Governor's Advisory Commission on Coastal Protection, Restoration and Conservation. This move will weaken the sole government entity tasked with saving Louisiana's coasts.

Coastal restoration must be front and center of any Louisiana civic agenda, and robustly funded by the two entities responsible for Louisiana's land loss: our government and the oil and gas industry. Louisianans pay for our government's failure to fix our coast year after year with blue roofs, flooded homes, and exorbitant insurance costs. It seems that Governor Landry wants us to pay more.

The enemy is at the gates and washing away our land. The governor is proposing that we pay the enemy to take more of our land. We must unite in the fight to save southern Louisiana. We must not reduce the CPRA, but expand it to include more Louisianans ready to rebuild our coasts.

Louisiana public policy expert Megan Milliken Biven has proposed more muscular strategies to make progress on our fight to save southern Louisiana from future land loss: 1) work with the Department of the Interior to fully remove decommissioned in place pipelines on our coast, 2) lead the fight to restore our public dredge fleet, 3) be a leading negotiator at the Lower Mississippi River Comprehensive Management Study. Louisiana must place priority on participating in this process and advocate for the overall health of the Mississippi River Basin, 4) Put Louisianans back to work plugging oil and gas wells and refilling pipeline canals.

This moment in history demands much of us. Please legislate knowing our state's fate depends on what your administration does next.

Shannon Sipher

[shannonmorley@gmail.com](mailto:shannonmorley@gmail.com)

174. I have attached LMOGA comments on Executive Order JML-13. If you have any questions or comments, please contact me. Thanks.

Best Regards,

Damien Watt

Director of Environmental Affairs

LMOGA

730 North Boulevard

Baton Rouge, Louisiana, 70802

225.387.3205

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[Damien.Watt@lmoga.com](mailto:Damien.Watt@lmoga.com)



Louisiana Mid-Continent  
Oil & Gas Association

February 21, 2024

Office of Governor Jeff Landry  
State Capitol  
P.O. Box 94004  
Baton Rouge, LA 70804-9004

Subject: Enhancing Louisiana's Economy through Efficient Regulatory Reform: Feedback on Executive Order JML-13

Dear Governor Landry,

Louisiana Mid-Continent Oil and Gas Association (LMOGA) is a state trade association representing all oil and natural gas industry sectors in Louisiana and the Gulf of Mexico. Our members provide safe, affordable, reliable energy products that make modern life possible and meet the demands of a global economy. LMOGA appreciates the Louisiana Department of Natural Resources (LDNR) engaging stakeholders in the regulatory process and fostering a collaborative environment that encourages constructive dialogue.

We recognize the importance of a streamlined regulatory framework that not only ensures environmental stewardship and public safety but also fosters industry growth and competitiveness. An efficient, transparent, and predictable regulatory environment is crucial for attracting investment, encouraging innovation, and ensuring the sustainable development of Louisiana's oil and gas resources.

Our commitment to Louisiana's prosperity drives us to support a regulatory approach that balances economic development with environmental and safety standards. We are eager to collaborate with your office and relevant state departments, offering our expertise towards refining a regulatory structure that encourages industry innovation and competitiveness. We trust that through collective efforts, we can achieve a regulatory environment conducive to attracting investments, thereby securing the future of Louisiana's oil and gas industry and its contribution to both the state and national economy.

LMOGA firmly believes that energy production and environmental preservation can coexist harmoniously. LMOGA's members will continue delivering energy that improves lives, increases national security, and protects the environment for future generations. We look forward to the opportunity to participate in this crucial dialogue and contribute to the development of regulations that support industry growth while safeguarding Louisiana's natural resources and communities.

Sincerely,

A handwritten signature in black ink that reads "Tommy Faucheux".

Tommy Faucheux  
President, Louisiana Mid-Continent Oil and Gas Association





175. February 21, 2024

Mr. Tyler Gray, Secretary

Louisiana Department of Energy and Natural Resources.

Re: EO-JML 24-13

Dear Tyler,

First, let me congratulate you on your new position. It is an important one and you bring a wealth of experience and contacts to it that should serve you and the State well. If I can be of any service to you in this adventure please don't hesitate to ask. I am writing now to offer some thoughts about EO-JML-24-13. I will confine these comments to aspects of the EO dealing with the roles and possible reorganization of the State's Coastal Restoration and Protection program and the Climate Initiatives Task Force. I am of course interested in the other aspects of the EO (LOSCO, State Lands, water management) but quite frankly can't see what is being proposed well enough to comment speak to them at the moment. I look forward to learning more about those and will reserve my thoughts and comments until then. With that prelude I would like to offer these thoughts about the EO.

Comments on EO JML 24-13

Few responsibilities of the State of Louisiana and its Governor rival those associated with the future of coastal Louisiana. Simply put, the stewardship of the state's coastal waters, wetlands, uplands and fastlands will dictate whether Louisiana, as we know it, will survive, much less prosper. It is a challenge that touches every aspect of our culture, natural heritage, economy and security. It is a challenge that will require forging of working relationships with our federal government and our sister states. And it is a challenge that will require working with diverse constituencies in order to seek common purpose and reduce conflicts. We know these things because that has been our State's experience over the past 40 years. It is experience worth honoring and building on.

Each new Administration brings with it the opportunity to reassess how the state can best meet its responsibilities to our coast and its people. It is now Governor Landry's turn and he has indicated in Executive Order JML 24-13 that he is interested in reorganizing the functions of the executive branch to better and more efficiently conserve and enhance the human and natural resources of the state with a specific eye toward creating a better prospective business climate in the State. The Governor is clear that the business climate he is focused on is that relating to natural resources and energy development and his preferred approach is to consolidate various areas of responsibility within the Department of Energy and Natural Resources (DENR). This includes the Coastal Protection and Restoration Authority (CPRA), the Governor's Office of Coastal Activities (GOCA), the Coastal Protection and Restoration Authority Board, and the Governor's Advisory Commission on Coastal Protection, Restoration, and Conservation (among others). Governor Landry has tasked the Secretary of the DENR with reviewing possibilities of consolidating those offices and programs with his agency.

To do that, the Secretary and the Governor will need to answer three questions:

1. Why are the State's coastal restoration, protection, and conservation efforts organized as they are?

2. Are there ways to make the State's coastal program more effective, efficient and confidence inspiring?

3. How would shifting CPRA, GOCA and the Advisory Commission to DENR produce actual improvements in how the coastal restoration, protection and conservation program pursues its mission and if and how that would improve the business climate for energy development? The answer to the first question lies in the history of the Louisiana's coastal restoration and protection program. Louisiana is no stranger to managing and benefiting from its vast wealth of natural resources. That vast abundance combined with improvements to flood control, navigation and the conversion of wetlands to drained or fastlands, the profits from timber, sulphur, salt, and oil and gas brought growth and prosperity to our state and our nation. But those benefits came at a cost to the resilience and sustainability of our coast, a fact that had been known in 1800s but that was not acted until much later. By the time the state and the nation came to terms with that reality in the late 1980s and 1990s, the state had already lost more than 1 million acres of coastal land loss. As dramatic as that figure is, the impact is more accurately measured by the loss of storm protection, loss of job and culture sustaining fish and wildlife populations and habitat, private lands and local tax bases, and escalating cost of living and doing business—not just the energy business--here. Those realities are what the state's coastal restoration, protection and conservation program was created to contend with, starting with Act 6 of the second extraordinary legislative session of 1989. In Act 6 the Legislature recognized the existential crisis posed by coastal land loss and the need for a coordinated and comprehensive a way to deal with it. Act 6 recognized the need for a robust role for the DENR's predecessor, the Department of Natural Resources (DNR), by creating at DNR the Office of Coastal Restoration and Management in order to administer the state's Coastal Use regulatory program under the Coastal Zone Management Act and to oversee the implementation of specific coastal restoration projects (coastal protection was not initially a focus of the coastal program and was still vested in the Department of Transportation and Development). More importantly, it also created the Wetlands Conservation and Restoration Authority (the predecessor of CPRA) within the Office of the Governor as well as the position of Executive Assistant for Coastal Activities in order to bring overall vision and coordination to state's coastal policies and programs. It was clearly understood at that time that while each state agency had an interest in some aspect of planning for the future of our coast, they each had too narrow a mission and too specific a constituency to be given overall responsibility for such a vital undertaking. That conclusion has been reinforced repeatedly by the legislature and was fundamental to the 2002 recommendations of Committee on the Future of Coastal created by Governor Foster and to creation of the current CPRA and the Advisory Commission and the expansion of their mission to include flood protection following Hurricanes Katrina and Rita in Governor Blanco's administration. Indeed, it is important to understand the DNR's role in the implementation of coastal restoration projects was largely shifted to the Governor's office to achieve great efficiencies and transparency as coastal protection and community adaption became larger parts of state's coastal program. That was not done to amass power in the Governor's office nor to penalize DNR. It was done because it made sense to the legislature and to the public. The wisdom of that approach was recognized and rewarded in the days following the Deep Water Horizon tragedy when Louisiana's approach to dealing with coastal restoration and protection was key to decision

by the nation to redirect billions of dollars that were preprogrammed to go to the U.S. Treasury into

In short, while there will always be room for improvement, the roles played by the Governor's office in the state's coastal program is not accidental and is not duplicative or contradictory to any state agency. Indeed, its entire reason for its existence is to deal with responsibilities not met by any single agency and to provide a framework for coordinating state priorities, resources and responsibilities.

With regard to the second question, the answer is undoubtedly yes, as the evolution the coastal program and roles played by state agencies and the Governor's office bear witness. But that does not mean that the process set in motion by Governor Landry's EO is the way to do it. To ask the new Secretary of DENR to undertake a review of programs, personnel and agencies with which he and DENR have little history and experience is unfair to them and to the program.

To ask them to do that while advancing the interests of the energy sector as a primary driver is to misunderstand the different missions, talents and experiences of DENR and the Governor's Office. It is akin to using a microscope to do the work of a telescope. It is the wrong tool for the job. And we should be clear, when it comes to coastal protection, restoration, protection, conservation, community adaption and energy development and management the Governor's office and DENR have very different jobs and always have. A better model would be to utilize the Advisory Commission, perhaps in tandem with the approach Governor Foster employed in creating the Committee on the Future of Coastal Louisiana mentioned earlier. At the least that approach would allow for adequate time for public engagement and careful deliberation to meet the historic levels of transparency and public confidence that the coastal program has enjoyed. The fact the EO seems to view the Advisory Commission too big (ie. Inclusive) and a burden is to misunderstand it. If anything, the Advisory Commission is an underutilized tool that would best be asked to be a more substantive source of input and advice. Indeed, since improved transparency is an explicit goal of the EO reducing the size and role of the Advisory Commission without clear cause would be contrary the entire history of the restoration and protection program and the stated objectives of Governor Landry.

Finally, with respect to the third question, it is difficult to see how the realignment would create either a more efficient, confidence inspiring coastal program or a more advantages business climate—especially for businesses outside of the oil and gas sector. The EO seems to be premised on the belief that the current alignment creates confusion, conflict and redundancy. But where is the evidence? Even if that were true, why is DENR presumed to be the solution to that problem and why is DENR the investigator and the one making the recommendations. And finally, why does this need to be done by February 23, 2024? The EO offers no explanation for that urgency and the accompanying lack of public input and discussion.

Coastal Louisiana is much more than a place on a map and much more than a definer of a people and of cultures. It is much more than an ecological treasure and much more than host to vital industries and economic activities. It is, of course, all of those things, but it is much more—it is any many ways central to who we are as a state and a people. What happens in and to our coast touches the lives of every living citizen and those yet to come. They may not

hunt or fish. They may not work in the navigation, tourism or energy sectors but if they care about what they eat, if they care about how the goods they buy or see get to market, if they care about the continuing to attract visitors from around the world and if they care about the availability and cost of insurance then they have a stake in the future of this coast. Those are the very reasons the State and its people have made coastal Louisiana a priority. They may not understand all of the science, law, and technology that go into keeping our coast as healthy as possible but they have long understood that a job that big is more than any single state agency can handle and that, in Louisiana anyway, to be real priority it has to be one for the Governor. To be sure the energy sector is an important part of that effort, but our State knew prosperity well before the energy sector developed in the 20th century. Our history also teaches that even prosperity comes with costs that are best acknowledged and addressed. After all, much of coastal restoration program is really an attempt to mitigate for the legacies of levees, canals, drainage, fluid extraction and channelization that came with spurring our historic prosperity. It would be a disservice to ascribe too much credit (or blame) to any one sector for our State's historic prosperity and it would be unwise and quite likely a violation of the State's responsibilities under Article 9 of our Constitution to give any one sector a privileged position as we plan for the future. Striking the right balances will not be easy and in that sense the task given you in the EO is not an enviable one. I strongly urge you to recommend to the Governor a more thoughtful, transparent, and purpose driven approach to aligning the missions and resources of the Executive Branch the challenges and opportunities that lie ahead.

Thank you for your consideration. Please note that in these comments I am speaking only for myself and not for Tulane Law School or Tulane University. Those affiliations are noted only for identification purposes only.

Mark S. Davis,  
Robert C. Cudd Professor of Environmental Law  
Director, Tulane Center for Environmental Law  
Tulane Law School  
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504-865-5982 504-919-8324

176. Dear Mr. Secretary:

Based on what is proposed and contemplated in Executive Order No. JML 24-13, CPRA should not be restructured. If something is not broken, then it should not be fixed. CPRA has flourished as an independent agency since its inception in the wake of Katrina, and its structure, which has fostered the Agency's growing successes, should not be transformed.

There are several pieces of the effort set forth in Executive Order No. JML 24-13 reflecting sensible and sound policy. For example, the effort to consolidate oversight and management of several smaller boards and commissions under an umbrella entity that would more effectively coordinate related goals is certainly something that would both reduce bureaucracy and increase the efficiency in the state. However, with regard to CPRA, dismantling its independence runs counter to the basic structure and resultant success of the Agency. As many accomplished legislatures on both sides of the aisle (and for many years) would note, CPRA is, by design, an independent authority of the state government. Its current

structure was deliberately designed to remove it from the swaying pendulum of politics and insulate it from excessive executive, legislative, or even judicial pressure or interference. This is because the unique mission and founding intent behind CPRA is that it must address massive regional problems over timeframes of decades. CPRA's core responsibilities of being in charge of the Master Plan, the Trust Fund, and executing projects under the Master Plan mirror those decade-expansive timeframes.

Accordingly, the formation and structuring of CPRA was no accident. The Legislature, along with the Governor's Office, the courts, and thousands of interested stakeholders came together resulting in the realization of the way in which CPRA was and is situated in the state government, organized, and operated. CPRA is vested with a set of authorities and powers that, by necessity, must be exercised with a view towards the long term. The problem with putting CPRA in an existing structure that serves the current elected Administration is simply that administrations change, including at least every eight years, and sometimes more frequently. If CPRA is forced to change, tacking every eight or four years in the process of executing a 50-year Master Plan, then CRPA will simply be rendered irrelevant. Such artificial administration-dependent dynamics are not in accord with the way in which the Agency is designed to operate.

Importantly, the Governor's Office already has significant control and influence on CPRA's directives through the Governor's Office of Coastal Activities. Placing CPRA under DNR would only serve to make the process by which the Governor's Office of Coastal Activities interacts with CPRA, not to mention other stakeholders' necessary interactions, more cumbersome, not less. Thus, in direct contravention of the stated goal of the Executive Order, inefficiencies and project delays, at the very least, would result.

Legislatures from both sides of the aisle and from across the state have long bragged about the independent success of CPRA, along with the positive economic impact by the Louisiana companies implanting work under its Master Plan such success has brought. Quite simply, there is no reason to tamper with the structure at the basis of those successes.

Respectfully submitted,

-Brendan Hughes

P.S. Please kindly confirm receipt. Thank you.

[Brendan.n.hughes@gmail.com](mailto:Brendan.n.hughes@gmail.com)

177. Good afternoon,

Please find attached my public comments to JML 24-13.

Best,

Haley Gentry

[hgentry@tulane.edu](mailto:hgentry@tulane.edu)

February 21, 2024

To Whom It May Concern:

I am writing to submit public comments in response to the proposal in Executive Order No. JML 24-13 to consolidate the Coastal Protection and Restoration Authority under the Louisiana Department of Energy & Natural Resources. We find ourselves at a very important moment in time where our decisions today will largely determine future environmental and socioeconomic conditions for all Louisianans. Sea level rise and coastal erosion threaten the future viability of Louisiana's coast and bring along with them irreversible, cascading impacts.

First, the proposed consolidation would undermine CPRA's mission and create inconsistency within LDENR. For one, CPRA does not have regulatory authority. Its implementing statute provides that "In the past, efforts by the state to address the myriad, interrelated problems of coastal protection have been inadequate, fragmented, uncoordinated, and lacking in focus and strong direction. The state must have a single agency with authority to articulate a clear statement of priorities and to focus development and implementation of efforts to achieve comprehensive integrated coastal protection."<sup>1</sup> On the other hand, LDENR is primarily a regulatory agency that is "responsible for the conservation, management, and development of water, minerals, and other such natural resources of the state, including coastal management, except timber and fish and wildlife and their habitats."<sup>2</sup> Historically, the relaxed regulatory oversight of oil and gas operations along the Louisiana coast led to widespread coastal erosion from canal digging, drilling, dredging, and failure to maintain and close channels. While these are not the only activities that contributed to the current coastal land crisis, they played a major role. There was (and still is) an urgent need to remediate damages to coastal resources – the very reason the state legislature created CPRA.

CPRA has been so successful over the years because of its commitment to science, data, and modelling, which informs a multi-year process for pursuing major projects to reduce flood risk. This has helped to shield CPRA's mission from political polarization. It's also important to note state legislators' overwhelming support for the Coastal Master Plan. Last May, state lawmakers unanimously approved the 2023 Plan.<sup>3</sup> This process, which has been improved upon since CPRA's creation in 2005, works. Like any governmental entity, there are changes that it might benefit from, but consolidation with the agency that oversees the development of extractive industries in the coastal zone is not the answer.

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<sup>1</sup> La. Rev. Stat. § 49:214.1.

<sup>2</sup> La. Rev. Stat. § 36:351(B).

<sup>3</sup> Claire Sullivan, Louisiana's \$50 Billion Coastal Plan Unanimously Approved by Legislature, Louisiana Illuminator (May 28, 2023) <https://lailuminator.com/2023/05/26/louisianas-50-billion-coastal-plan-unanimously-approved-by-legislature/>

As discussed above, CPRA does not deal with regulatory matters and operates in its own lane to conduct research and modeling to prioritize projects of the highest importance for efficient implementation. Meanwhile, LDENR does not have the structural organization or resources to take on CPRA's functions. In fact, just last week, a spokesman for LDENR said that the agency is not "budgeted or authorized to do ahead-of-the-time research."<sup>4</sup> This is a clear indication that it cannot and will not be able to carry forward CPRA's responsibilities.

Second, this proposed change threatens to undo important progress in coastal protection efforts, creating further uncertainty for the future of the state's coastal communities. To start, the Coastal Master Plan does not have a permanent stream of funding and faces a financial cliff in the coming years after Deepwater Horizon settlements run out. A consolidation of CPRA into LDENR could make that process even more difficult. What's more, section 3 of JML 24-13 lists twelve other entities that will be considered for consolidation or reorganization. This includes many entities that support responsible management of our state's natural resources and represent a wide array of interests beyond environmental. The E.O. mentions the importance for "boards and commissions to serve a constitutionally or statutorily defined purpose," to which I make note of Article IX, Section 1 of the Louisiana Constitution. It provides in part, "The natural resources of the state, including air and water, and the healthful, scenic, historic, and esthetic quality of the environment shall be protected, conserved, and replenished insofar as possible and consistent with the health, safety, and welfare of the people." CPRA fulfills this role pursuant to laws enacted by the legislature. Further, if we continue to prioritize energy and industrial development, the array of those entities identified in section 3 are very much needed, in some shape or form, to ensure our natural resources may be "protected, conserved, and replenished," as intended by the state Constitution. What about abandoned wells? Site remediation? Irreversible atmospheric change from increased industrial emissions?

The oil and gas industry has successfully lobbied for exemption after exemption under key environmental and public health laws. These companies benefit from an extremely business friendly tax code. I struggle to see how sidelining coastal restoration and resilience programs for the oil and gas industry can be in the public interest of Louisiana – or how placing CPRA functions under the industries' permitting authority would benefit them either. To illustrate the inconsistencies, Louisiana and many of its local entities are currently suing FEMA over its new risk rating system for the National Flood Insurance Program which has led to rising premiums because of severe flood risk from stronger storms and sea level rise. So, with the cost of both homeowners and flood insurance skyrocketing in Louisiana, it would be a disservice to the

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<sup>4</sup> Tristan Baurick, Louisiana's Unusual Nearshore Wind Farms Could be Bird 'Minefields' (Feb. 12, 2024) [https://www.nola.com/news/environment/louisianas-unusual-wind-farms-could-be-bird-minefields/article\\_6d8107d6-c785-11ee-a16a-6fe8cf952c91.html](https://www.nola.com/news/environment/louisianas-unusual-wind-farms-could-be-bird-minefields/article_6d8107d6-c785-11ee-a16a-6fe8cf952c91.html)

people of this state to undermine critical government programs that aim to reduce risk to coastal property and other key assets.

Finally, the timing of these executive orders cannot be overlooked. It is difficult to ignore the fact that this request for comments came on a Friday when Mardi Gras celebrations were well underway for large portions of the state. Twelve days is not a sufficient time for widespread, meaningful input in any circumstance. When you calculate the holiday, the Governor realistically only gave seven days weekdays to weigh in on a proposal that would severely undermine coastal protections efforts. Then, there is JML 24-13's February 23<sup>rd</sup> deadline for the LDENR Secretary to make recommendations on the proposal, just two days after the public comment deadline. That raises serious questions about whether any public input will actually be considered in those recommendations. Such a large undertaking, as is envisioned by JML 24-13, should warrant much more detailed consideration and public input.

Over two million Louisiana citizens reside in the coastal zone. If there is no livable coast, there is no real future for the state—including the oil and gas industry. This administration must take a hard look at what these proposed policies will mean for the future of Louisiana. We are already one of the most industrialized states in the country, and there will still be new jobs and industrial development as things currently stand. What will change is our ability to manage and adapt to changes in the coastal landscape.

I hope that the concerns raised in these comments are helpful and informative. Thank you for your consideration.

Best,  
Haley Gentry



178. **Stakeholder Information:**

Full Name: Krystal Kincaid

Louisiana Resident: Yes

E-Mail Address: krystalkincaidd@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? EO-JML-13 COMMENTS

How has or may it impacted you? Your organization?

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented? If the Landry Administration is searching for more muscular strategies to make progress on this fight, may we offer four suggestions? Work with the Department of the Interior to fully remove decommissioned in place pipelines on our coast. The Bureau of Safety and Environmental Enforcement has allowed transnational companies to leave 97% of pipelines (18,000 miles) on the seafloor on Louisiana's coast. While these pipelines no longer transport oil or gas, they do obstruct Louisiana's access to sand for coastal restoration projects. The Secretary of the Interior has not exercised her authority to order those pipeline's removal. But your Administration's governance and leadership could force the action putting Louisiana workers and vessels to work today, while clearing CPRA's path to access that sand for our coast. Lead the fight to restore the public dredge fleet. You can't win a fight with one arm tied behind your back, and Louisiana has both arms tied. The United States used to lead the world in dredging technology to ensure that our 12,000 miles of inland and intracoastal waterways were navigable, our 180 ports accessible, and our 95,471 miles of shoreline and beaches nourished. Indeed, at its height the U.S. Corps built 150 dredges between 1899 and 1949. Today, American cities and even Corps districts squabble for access to a small and outdated fleet. Why? Because a cartel of companies bought some senators in the 1970s and forced the Corps to mothball its fleet and use only vessels owned by these same companies. While Louisiana is waiting, China is building. In the last twenty years China has built over 20 jumbo trailing suction hopper dredgers and launched at least 44 large cutter suction dredgers. As China is literally shaping the world, we are just accepting a condition a few bribed and long dead Senators forced upon us. But you could lead the fight to restore the public dredge fleet. We don't rent firetrucks or tanks, nor should we rent this critical piece of equipment. We could build many of the new

fleet in Louisiana shipyards, with one or two permanently docked at our coast to do the necessary work of rebuilding our state's coast. Be a leading negotiator at the Lower Mississippi River Comprehensive Management Study. Louisiana is a creation of the Mississippi River. Whether it's the 40 thousand plus locks and dams holding back sediment or big-ag failing to prevent nutrient runoff, it all runs downstream and impacts our industries and communities. Louisiana must place priority on participating in this process and advocate for the overall health of the Mississippi River Basin. Put Louisianans back to work plugging oil and gas wells and refilling pipeline canals. Louisiana could receive a total \$206.5 million in Infrastructure Investment and Jobs Act of 2021 (IIJA) funds to clean up their orphaned wells. This includes \$25 million in initial grants, \$111.5 million in formula grants and up to \$70 million in performance grants. Louisiana is also eligible for \$15.7 million in plug marginal wells to reduce methane emissions. This funding is crucial but will only address a part of Louisiana's total unplugged, non-producing inventory of wells (not to mention that dozens of new wells are orphaned every month). Louisiana's coastal crisis and remediation of retired oil and gas liabilities are not mutually exclusive activities. Between 1937 and 1977, more than 6,300 exploratory wells and more than 21,000 development wells were drilled in Louisiana's eight southernmost parishes. Agerton et. al estimate that just under 5,000 of Louisiana's unplugged wells are currently situated in Louisiana's wetlands and inland waterways and 2,612 unplugged wells in Louisiana state waters. In our national survey of oil and gas workers, we found that just under half (44%) of Louisiana-based survey respondents said they had been let go at least once prior to 2020 and 15% reported having been let go more than once. This bears out in the employment data. Between 2008 and 2019, direct employment in "Drilling Oil & Gas Wells" crashed by 62% and "Support Activities for Oil & Gas Operation" decreased by 26% in Louisiana. At the same time offshore production in the federal waters of Louisiana increased by 44%. Despite a dramatic increase in production, jobs in production plummeted. In Louisiana, direct upstream and exploration oil and gas sector jobs now account for less than 2% of the total state civilian workforce. And that number is only decreasing. But we could bring our Oilfield Site Restoration Program in-house, acquire workover rigs and vessels, and employ Louisianans directly. Louisiana could lead the nation in well plugging and restoration.

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

179. **Stakeholder Information:**

Full Name: H J BOSWORTH JR

Louisiana Resident: Yes

E-Mail Address: hjbosworthJR@YAHOO.COM

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Consolidation of the Coastal Protection and Restoration Authority underneath the Department of Energy and Natural Resources

How has or may it impacted you? Your organization? Reducing the number of board members and advisors at the CPRA will lessen the effectiveness of the CPRA.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?    yes

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.    The CPRA was established as directed by the federal government in 2005-2006 to serve as a single agency to work with the feds in matters of flood control.

Did the program your comment concerns change over time? Did it evolve into associated programs?    The CPRA has evolved over the past 18 years

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?    The legislature SHOULD NOT CHANGE the CPRA. It should remain as-is and not be watered down and subject to another department's management.

Use specific details to support the case.    Advisors to the CPRA are often unpaid and are helping the state remain safe and flood control free from political influences.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)?    Virtual

180.    CPRA must remain an independent agency. Serious legislation has occurred over the past 20 years which resulted in a single state entity able to prioritize Louisiana’s coastal protection and restoration efforts in a comprehensive and principled manner. Look at what has been accomplished! It’s success has been extraordinary. In 2024 this independent agency is overseeing \$1.6 Billion dollars in coastal projects, which benefit our citizens and state.

Sincerely,

Courtney Le Clercq

courtney le clercq | member

johnson rice & company, llc

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new orleans, louisiana 70113

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(504) 584-1236 direct

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181.    There is nothing more important to the State of Louisiana than restoring and maintaining the coast. Please keep CPRA as a stand-alone entity with the prominence and independence it deserves. It should not be folded into anything, much less an energy department.

Sincerely yours,

Janet Howard

[janethoward@gmail.com](mailto:janethoward@gmail.com)

182. **Stakeholder Information:**

Full Name: Shane Holmes

Louisiana Resident: No

E-Mail Address: shanewinfieldholmes@gmail.com

Organization (if applicable): Levees.Org

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? I am coming out against a proposal to consolidate the Coastal Protection and Restoration Authority (CPRA) underneath the Louisiana Department of Energy and Natural Resources. I am also opposed to a plan to reduce the number of board members and advisors at the CPRA.

How has or may it impacted you? Your organization? Reducing the number of board members and advisors at CPRA means there are less people on hand to get residential input on coastal planning for upcoming hurricanes.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. When Hurricane Katrina struck New Orleans in August 2005 the damage was extensive and the government response extremely delayed. But a huge part of the reason for the damage and delay in response was the way the organization structure of FEMA was changed after the 9/11 terrorist attacks. After 9/11, the Department of Homeland Security was created and FEMA was placed underneath that department. Prior to this change, FEMA was a department where the top organizational member was member of the President's cabinet. But after the Department of Homeland Security was created, the organizational change meant that the Security of Homeland Security became the person that was a member of the cabinet. The practical implications of this was that instead of the head of FEMA being the table during preparations and response discussions with President Bush for Hurricane Katrina, the Secretary of Homeland Security was.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented? Both boards should not be reduced as the board members are volunteers.

Use specific details to support the case. Volunteers are not paid and would it would not impact the budget for the volunteers to be let go. Also, both boards have been consulted and neither one sees any benefit to cutting the number of people.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? No

183. **Stakeholder Information:**

Full Name: Rachel McCaleb Watts

Louisiana Resident: Yes

E-Mail Address: wattsrachelm@gmail.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? consolidating the Coastal Protection and Restoration Authority (CPRA) underneath the Louisiana Department of Energy and Natural Resources.

How has or may it impacted you? Your organization? This seems like a conflict of interests. We need radical change in our energy use and many other areas if we want even a prayer of saving our state.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? No? Not sure

Does it fall under existing statutes? Regulations? Not sure

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? No

184. **Stakeholder Information:**

Full Name: Megan Biven

Louisiana Resident: Yes

E-Mail Address: megan@truetransition.org

Organization (if applicable): True Transition

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? These comments are in reference to the potential reorganization of the Coastal Protection and Restoration Authority. We are concerned that if the Coastal Protection and Restoration Authority is folded back under the Department of Energy and Natural Resources roof, its mission will be muddled and its mandate weakened. The author of this comment has some relevant background she would like to share that leads her to this conclusion. I used to work for the Bureau of Ocean Energy Management where among other tasks I helped plan oil and gas lease sales for the United States government primarily off the coast of Louisiana. BOEM and BSEE process dozens of

seismic, drilling and exploration permits a week. It also manages the nation's Marine Minerals Program - a program critical to states like Louisiana who rely upon the high quality sediment in federal waters for coastal restoration projects. During the first shale boom, companies began stampeding out of the shallow Gulf, relinquishing their oil and gas leases left and right. They also requested, and more often than not, succeeded in decommissioning their pipelines in place on the seafloor. Now both federal regulation, the lease contract, and federal law require and assume that once commercial activities have ceased, the seafloor will be cleared of all obstructions. Nevertheless, this office allowed companies to decommission in place thousands of miles of pipeline in a short period. This was able to happen because the mission for both agencies is and remains to promote expeditious oil and gas development on the OCS. (Contrary to popular rhetoric, staff within the agency have PD's whose salaries and career advancement are explicitly tied to these missions.) The Marine Minerals Program sounded the alarm that these pipelines (of no public use mind you) were located in prime borrow areas. It took several years of internal lobbying to end the practice in high quality borrow areas. It was finally with the intervention and advocacy of the Louisiana Coastal Protection Restoration Authority that the Marine Minerals Program succeeded in adding an additional review to these requests. The U.S. federal government could now decline the request of a transnational firm who wanted to decommission a pipeline in a high value sand area because of the strength of a state agency. This story has a few lessons. One being that the CPRA has evolved into a powerful and influential organization. With Texas' planned Ike's dike and East Coast states planning their own large scale coastal programs, Louisiana leadership would be making a regrettable decision to relinquish this power and influence. Second, in an organization with competing missions, the one with the incumbent mission will win. There will be conflict. Indeed, in the 1940s, the Louisiana Department of Conservation contained both Minerals and Wildlife divisions which created a great deal of internal conflict, "it is by all now realized that the Conservation of the wildlife has no relation to oil and gas and other minerals and same should be separated in distinct departments. For instance in some cases we see one official in the Wildlife Division making an effort to stop the pollution of a stream by oil or salt water from oil wells when another division of the Department may consider each pollution as temporary and necessary for the production of oil and gas." (September 1944 - Synopsis and History of Fresh Water Game Laws of Louisiana). As a result, on November 7, 1944, Louisiana citizens approved a constitutional amendment that divided the Department of Conservation into three agencies: the Department of Conservation, the Forestry Commission, and the Department of Wildlife and Fisheries. (Arnold, John T, 2020).

How has or may it impacted you? Your organization? The future of our families and represented stakeholder communities rely upon the success of the Coastal Protection and Restoration Authority. It matters little whether our constituents have a job if they can't secure home insurance. Additionally, we have found that both upstream and downstream oil and gas employers are whittling down their employment rolls in Louisiana. For Louisiana oil and gas workers, a transition has already begun. Three separate refineries closed in the last three years (firing 2,100 Louisiana workers) bringing the number of refineries in the state down to 15 facilities. But those 15 facilities are distilling more today than when the state boasted 34 refineries. Between 2008 and 2019, direct employment in "Drilling Oil & Gas Wells" crashed by 62% and "Support Activities for Oil & Gas Operation" decreased by 26% in Louisiana. At

the same time offshore production in the federal waters of Louisiana increased by 44%. Despite a dramatic increase in production, jobs in production plummeted. In Louisiana, direct upstream and exploration oil and gas sector jobs now account for less than 2% of the total state civilian workforce. The employment trends are plain as day. We believe that the state master plan project and cleaning up no longer in use oil and gas infrastructure will create durable employment opportunities for displaced oil and gas workers.

### **Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? Yes. There are several sections within the Louisiana Constitution specifically pertaining to the management of the Coastal Protection and Restoration Fund. It makes clear that the funds shall be administered by the Coastal Protection and Restoration Fund in accordance with the State Master Plan. It is our concern that if the CPRA is subsumed into the DENR with a mandate to promote a “prospective business environment,” then its mission and purpose will be compromised. What good is a “prospective business climate” if employees can’t secure home insurance or if businesses and schools will be underwater? In this moment, we require clarity of purpose and leadership that will not waver. §10.2. Coastal Protection and Restoration Fund Section 10.2(A) There shall be established in the state treasury the Coastal Protection and Restoration Fund to provide a dedicated, recurring source of revenues for the development and implementation of a program to protect and restore Louisiana’s coastal area. (D) The money in the fund may be appropriated for purposes consistent with the Coastal Protection Plan developed by the Coastal Protection and Restoration Authority, or its successor. No appropriation shall be made from the fund inconsistent with the purposes of the plan. Additionally, the Louisiana Constitution clearly prioritizes the public benefits derived by coastal restoration and flood protection. For instance, in the cases of State expropriation or action to take private property, a party has the right to trial by jury to determine whether the compensation is just, except in the takings of property for levee and levee drainage purposes or for the purposes of wetland restoration. Please see below: (E) This Section shall not apply to appropriation of property necessary for levee and levee drainage purposes. (F) Further, the legislature may place limitations on the extent of recovery for the taking of, or loss or damage to, property rights affected by coastal wetlands conservation, management, preservation, enhancement, creation, or restoration activities.

Does it fall under existing statutes? Regulations? As your office well knows, the Louisiana Legislature and prior Administrations worked to create a locus of expertise and efficiency. Below is a sampling of the statutes that created the CPRA and the regulations that describe its authorities and powers. 2005 – Act 8 of the First Extraordinary Session of 2005 2008 - Executive Order BJ 2008-7 2009 – Act 523 of the Louisiana Legislature 2012 – Act 604 of the Louisiana Legislature La. R.S. 49:214.1 La. R.S. 49:214.5.5 La R.S. 49:214.5.6 La. R.S. 49:214.2(3) La. R.S. 49:214.2(10) La. R.S. 49:214.5.6 and Article I Section 4 of the Louisiana Constitution Act 523 of 2009 Regular Legislative Session enacted La. R.S. 49:214.6.9. which grants authority for integrated coastal protection surveying Acts 2006, No. 626: amended La. R.S. 41:1702(D)(2)

### **Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. Executive Order JML-2413 hints at tucking the CPRA back under

the weight of competing missions as to create “a better prospective business climate.” It is not only a departure from consensus, but a retreat from the fight. Prior to 2005, Louisiana’s attempts to stave off this inundation were scattered and inadequate. The Louisiana State and Local Coastal Resources Management Act (Act 361) was passed in 1978 to regulate the activities that affect wetland loss and allowed parishes to apply for their own permitting program. The resulting Louisiana Coastal Resources Program (LCRP) became a federally approved coastal zone management program in 1980. Authorized by Congress in 1990, the Louisiana Coastal Wetland Conservation and Restoration Management Act took several important steps towards building state capacity. It brought the LCRP, Louisiana’s federally approved coastal management program under the management of the DNR. It then tasked the DNR with creating a comprehensive coastal restoration plan and created the Coastal Restoration Division (CRD) to house the expertise to do so. It also created a fund, the Wetland Conservation and Restoration Fund (Wetland Trust Fund). Monies for the fund continue to accrue from taxes on oil and gas activities and are devoted specifically to CRD projects within the comprehensive plan. It also created a state level authority, the Wetlands Conservation and Restoration Authority (WCRA), to oversee the pla. Within a year, a related federal bill, the Coastal Wetlands Planning, Protection, and Restoration Act (CWPPRA), was passed. It provided for 75/25 federal/state cost sharing. Although some of the money is directed towards other states, a majority of the funds – created from taxing fishing equipment, motorboats, and engine fuel – is dedicated to Louisiana. The state receives approximately \$50 million annually (National Research Council, 2005). Approximately 30% goes towards the National Coastal Wetlands Conservation Grant Program and the North American Wetlands Conservation Fund. The other 70% goes towards the Army Corps of Engineers for construction and other associated activities in the Louisiana coast. The Breaux Act, as it is called in Louisiana after its sponsor the popular and longtime senator John Breaux, created a state and federal collaborative called the Breaux Act Task Force to oversee the development of a comprehensive restoration plan. This plan stipulated that any and all programs affecting coastal wetlands would be consistent with its purposes yet gave no procedural guidance on how to do so and was not enforced (Coastal 2050, 1998). The model for restoration set by the Breaux Act Task Force continues to be used today, amidst some controversy. Annually, the Breaux Act Task Force submits a Project Priority List (PPL) to Congress. Before the CPRA was created, the DOTD was responsible for hurricane protection (predominately via levee building), and the LDNR was responsible for coastal restoration. There was an identified need for increased cooperation between the two agencies, but sufficient and necessary incentive did not yet exist to overcome barriers preventing a voluntary formal agreement between the two agencies. Coastal restoration and protection projects competed for funds through the same funding processes, on the federal level through the Water Resources Development Act and similarly at the state level within appropriative committees of the legislature. The two agencies were not only adversarial in terms of funding, but also differed procedurally. Communication between the two was limited. Talks meant to bring about improved coordination and possible merger between the two agencies ended with no finished product largely due to disagreement concerning funding. The Water Resources Development Act (WRDA) authorizes but does not fund projects. Funding comes later through the appropriations process, specifically the Energy and Water Development Appropriations bill.



Louisiana frequently found itself in competition with Florida, whose comprehensive Everglades Restoration Project put it on stronger footing with federal partners. The 2005 hurricane season reinforced the importance of comprehensive planning to decision-makers and brought back Coastal 2050-like initiatives only with a greater sense of urgency: regional public meetings, reducing the number of planning units, consolidating cumbersome political jurisdictions, building state capacity through strong leadership at the executive level and technical expertise, and addressing linkages among coastal activities at all possible levels. Most importantly, it brought the activities of the DNR and the DOTD under one roof which would allow the state to act as a full partner to the Corps, not just a consumer of services. The original statute passed in 1989, about 16 years previous, reads “efforts by the state to address the myriad interrelated problems of coastal land loss have been inadequate, fragmented, uncoordinated, and lacking in focus and strong direction.” The goal of the original authority was to strike a “balance between development and conservation”(La. R.S. 49:213:1(C)). The Louisiana Legislature created the Louisiana Coastal Protection and Restoration Authority (CPRA) to elevate the coastal crisis to the appropriate level and end the confusion once and for all. With the state’s experts finally sitting in one room, we also got our first comprehensive plan to save our coast. This was critical in helping Louisiana secure a larger share of the royalties from oil and gas produced off our coast. In the late Morgan Nicole Crutcher’s graduate thesis, she explains the history and challenges faced by the CPRA. She interviewed a variety of Louisiana officials who participated in the process who explained how prior dysfunctions gave rise to a new culture that was akin to 1960s NASA. With the CPRA, Louisiana has been able to create a structure and organization capable of meeting the monumental task in front of it. As one contributor to the State Plan explained to her, “It gave us the opportunity...to go to Washington with a document in hand and say, ‘Look, Louisiana is serious. We are moving forward with or without the help of the federal government or the ability of the Corps of Engineers to move forward in a timely fashion. We have chosen to take control of our own destiny.” For a detailed history of Louisiana coastal restoration prior to the CPRA with specific dates and statutes, we highly recommend you review Morgan Crutcher’s thesis:

<https://deepblue.lib.umich.edu/bitstream/handle/2027.42/85798/Morgan%20Crutcher%20Thesis%20Final%20August%2016%202011%20pdf.pdf?sequence=1&isAllowed=y>

Did the program your comment concerns change over time? Did it evolve into associated programs? Yes, as the above comments speak to the Coastal Protection Restoration Authority grew out of a moment of crisis and a legacy of disorder. The CPRA has quickly grown into one of the nation’s most sophisticated and coherent large-scale restoration programs. Louisiana’s future business and economic prospects have a hard stop unless we appropriately address our coastal crisis. It is also true that the CPRA is not enough. There are material constraints to Louisiana achieving the task in front of it. We offer four recommendations in addressing some of them. Work with the Department of the Interior to fully remove decommissioned in place pipelines on our coast. The Bureau of Safety and Environmental Enforcement has allowed transnational companies to leave 97% of pipelines (18,000 miles) on the seafloor on Louisiana’s coast. While these pipelines no longer transport oil or gas, they do obstruct Louisiana’s access to sand for coastal restoration projects. The Secretary of the Interior has not exercised her authority to order those pipeline’s removal. But your

Administration's governance and leadership could force the action. It could also put Louisiana workers and vessels to work today, while clearing CPRA's path to access that sand for our coast. Lead the fight to restore the public dredge fleet. You can't win a fight with one arm tied behind your back, and Louisiana has both arms tied. The United States used to lead the world in dredging technology to ensure that our 12,000 miles of inland and intracoastal waterways were navigable, our 180 ports accessible, and our 95,471 miles of shoreline and beaches nourished. Indeed, at its height the U.S. Corps built 150 dredges between 1899 and 1949. Today, American cities and even Corps districts squabble for access to a small and outdated fleet. Why? Because a cartel of companies bought some senators in the 1970s and forced the Corps to mothball its fleet and use only vessels owned by these same companies. While Louisiana is waiting, China is building. In the last twenty years China has built over 20 jumbo trailing suction hopper dredgers and launched at least 44 large cutter suction dredgers. As China is literally shaping the world, we are just accepting a condition a few bribed and long dead Senators forced upon us. But you could lead the fight to restore the public dredge fleet. We don't rent firetrucks or tanks, nor should we rent this critical piece of equipment. We could build many of the new fleet in Louisiana shipyards, with one or two permanently docked at our coast to do the necessary work of rebuilding our state's coast. Be a leading negotiator at the Lower Mississippi River Comprehensive Management Study. Louisiana is a creation of the Mississippi River. Whether it's the 40 thousand plus locks and dams holding back sediment or big-ag failing to prevent nutrient runoff, it all runs downstream and impacts our industries and communities. Louisiana must place priority on participating in this process and advocate for the overall health of the Mississippi River Basin. Put Louisianans back to work plugging oil and gas wells and refilling pipeline canals. Louisiana could receive a total \$206.5 million in Infrastructure Investment and Jobs Act of 2021 (IIJA) funds to clean up their orphaned wells. This includes \$25 million in initial grants, \$111.5 million in formula grants and up to \$70 million in performance grants. Louisiana is also eligible for \$15.7 million in plug marginal wells to reduce methane emissions. This funding is crucial but will only address a part of Louisiana's total unplugged, non-producing inventory of wells (not to mention that dozens of new wells are orphaned every month). Louisiana's coastal crisis and remediation of retired oil and gas liabilities are not mutually exclusive activities. Between 1937 and 1977, more than 6,300 exploratory wells and more than 21,000 development wells were drilled in Louisiana's eight southernmost parishes. Agerton et. al estimate that just under 5,000 of Louisiana's unplugged wells are currently situated in Louisiana's wetlands and inland waterways and 2,612 unplugged wells in Louisiana state waters. In our national survey of oil and gas workers, we found that just under half (44%) of Louisiana-based survey respondents said they had been let go at least once prior to 2020 and 15% reported having been let go more than once. This bears out in the employment data. Between 2008 and 2019, direct employment in "Drilling Oil & Gas Wells" crashed by 62% and "Support Activities for Oil & Gas Operation" decreased by 26% in Louisiana. At the same time offshore production in the federal waters of Louisiana increased by 44%. Despite a dramatic increase in production, jobs in production plummeted. In Louisiana, direct upstream and exploration oil and gas sector jobs now account for less than 2% of the total state civilian workforce. And that number is only decreasing. With advances in oil and gas drilling technology (laterals and automation), the upstream oil and gas industry is leaner. But Louisianans with expertise and oilfield experience are an asset waiting to be put

to use. Addressing no longer in use oil and gas wells in the coastal zone (including offshore) could create tens of thousands of jobs. Louisiana could lead the nation in well plugging and restoration and remove the obstacles in the way of full coastal remediation.

Provide historical context and perspective. OCS Pipelines: When an oil and gas operator signs a lease with BOEM, they agree to remove all equipment and clear the seafloor when the infrastructure is no longer useful for operation. The Secretary has the authority to unilaterally determine infrastructure is no longer useful for operation. The operator then has one year to remove its equipment. The Bureau of Safety and Environmental Enforcement has allowed the offshore oil and gas industry to leave 97% of pipelines (18,000 miles) on the seafloor when no longer in use. Aging oil and gas infrastructure is inhibiting access to offshore sand resources for coastal restoration. 30 CFR § 250.1754 establishes clear authority to the BSEE Regional Supervisor to order the removal of a pipeline decommissioned in place if that pipeline constitutes an obstruction. These pipelines provide no physical or material benefit to the American public, but they do impose an artificial limit on how much sand is available for coastal restoration. Dredge Fleet: Failures of private firms to fulfill urgent channel deepening contracts in New York Harbor and the subsequent dearth of bidders on new contracts produced a situation which demanded a public option. In 1902, the federal government initiated a program of hopper dredge construction, adding 16 vessels to the dredging fleet by 1908. Public hopper dredges operated in the coastal waters of the Atlantic and the Pacific, in the Mississippi River Passes and in the Great Lakes. Recognizing the need for a central design agency to develop the plant and programs of a growing dredging fleet, the Secretary of War in 1908 established a Marine Division in the Office of the Chief of Engineers in Washington, D.C. This design group made significant contributions to the development of dredge pumps and other specialized machinery, and the first diesel-electric dredges were designed and built in 1918. The hopper dredge soon developed into a complex specialized vessel requiring maintenance and occasional updating and conversion. In total the Corps built 150 dredges of various types and purposes between 1899 and 1949. Until the 1960s, the nation's development of Federal navigation waterways and port access channels was primarily accomplished by the Corps dredging fleet. Then, in the mid-1960s, the Corps was faced with replacing aging dredges and Congress slowed its investment in deeper ports and channels. Total dredging (performed by both government and private industry) began to decline significantly, dropping from 480 million cubic yards in 1963 to 282 million in 1979. In his official military memoir, Lieutenant General John W. Morris described how during his tenure there had been no public works authorization bill, or omnibus bill, and many projects had been waiting for funding for years. In 1972, Congress imposed a multi-year dredge moratorium - intentionally holding funds for replacement of public dredges hostage until a "National Dredging Study" on privatizing the fleet was completed. Meanwhile, private industry was actively lobbying Congress to choke the Corps of appropriations for the modernization and replacement of dredges in the Corps fleet. John A. Downs, then-President of Chicago's Great Lakes Dredge & Dock and the President of the National Association of Dredging Contractors, testified in several Congressional appropriations committee hearings to not fund or replace existing Corps hopper dredge vessels and that if the government even considered replacement it should first consult industry. Essentially, private industry was directing Congress (and succeeding) to hold dredging funding hostage. In 1976, the Senate

Committee on Environment and Public Works Subcommittee on Water Resources held a hearing on proposed legislation, H.R. 7744, to privatize the public dredge fleet. Critics were incredulous, while defenders were dismissive, evoking now familiar rhetoric on smaller government and an almost naive faith that 'it will just work out.' A private consultancy's study on privatizing the public fleet forecasted that American citizens would pay between 20 and 26 percent more for industry to do all of the necessary work versus an exclusive Corps fleet. When the Corps and industry were grilled on the rate forecasts, the answers were evasive explaining that the Corps "expect[ed] that the extensive competition which has been available in the past will continue to be available, which should keep the contract bids within a reasonable range." No evidence was presented to support this claim. Congress passed the Minimum Fleet Legislation Public Law 95-269 of April 26, 1978. The new policy directed the Corps to utilize its own fleet only when a private bid exceeded the government bid by 25 percent (there's those forecast figures put to use). Since the 1990s, Congress has passed several rounds of legislation that have effectively crippled public dredging capacity and placed American ports, inland waterways and coasts at the mercy of just five companies. The Wheeler, a Corps' hopper dredge built in the Avondale shipyard specifically to maintain navigation for the Mississippi River Head of Passes, had its workday schedule limited to only 55 workdays per year plus emergencies (ready-reserve status). For context, the Corps estimates that it spends \$12.5 million annually to maintain the Wheeler in ready reserve status, of which \$8.4 million is needed to cover the costs incurred when the vessel is idle. Three separate chairs of that subcommittee sponsored legislation placing restrictions on the Corps dredge fleet. Each Congressman, John Meyers, Tom Bevill and H.L. Callahan, would leave their careers in government service to work for a government relations firm, Dawsons & Associates, where each would work as a lobbyist representing the same dredging company, Chicago-based Great Lakes Dredge and Dock. . In less than ten years, prices had increased by over 117%, but the amount dredged had only increased 9%. And while the \$/cubic yard figures appear modest (\$2.57/cubic yard in 2003 and \$5.13/cubic yard in 2012), the impacts on total dredged material are not. Louisiana is forced to adjust its large-scale ambitions because of cronyism. Orphan Wells: Between 1999 and 2022, Louisiana's OSR program plugged 1,758 orphaned wells. In that same time period, 5,629 new oil and gas wells were orphaned under the oversight of the Louisiana Department of Energy and Natural Resources. Louisiana's DNR currently lists 4,533 orphaned wells. In some regions, orphan well inventories are the relics of industry from over a century ago. But Louisiana's ever ballooning orphan well inventories are the discards of modern oil and gas producers. While Louisiana's OSR program successfully plugged 120 wells between January and March 2023, in the same period, an additional 150 wells were orphaned.

### **Conclusion**

Why should your proposed changes be implemented? Because we all care about the future of Louisiana and they are necessary for its survival.

Use specific details to support the case. Louisiana needs a strong central authority with a clear mandate. The Coastal Protection and Restoration Authority and its Board are the result of bipartisan planning and agreement and the will of the Louisiana public. It has formed the institutional knowledge and processes that will be key in achieving our coastal and storm protection goals. Other state actions and agencies should not pursue policies that undermine

or harm our coastal restoration plan. The current CPRA structure and autonomy are designed to prevent these scenarios. The expertise provided by the Governor's Advisory Commission on Coastal Protection, Restoration and Conservation ensures the State's Coastal Master Plan is nimble and the Governor's Office can act based on the latest engineering and scientific advances. We leave a quote from the 1910 Louisiana Conservation Commission (DNR and Wildlife and Fisheries predecessor). Even over a century ago, our leadership understood that Louisiana's rare bounty was something to protect. We have an obligation to our children and grandchildren to restore this paradise before it's lost. "In the case of those who look alone to their own profits, totally regardless of public welfare, the law must enter on behalf of the public, and regulation the operation of this class. The operator in natural resources, who operates solely for his own profit and without regard to the effect of his operation on the public welfare proceeds on the theory that thwart he has bought and paid for, he may do with as he pleases. He is wrong. It is the principle of law necessarily adopted by men when they associate themselves together in government, that the rights of the individual must necessarily be limited by the rights of his fellow individual. To say that a man may do what he pleases with his own is denied in a thousand ways, not only by law, but by custom and even public opinion."

Reference relevant citations to strengthen your argument. Caffey RH, Petrolia D, Georgious IY, Miner M, Wang H, Kime B. 2020. Economic and geomorphic comparison of Outer Continental Shelf sand and nearshore sand for coastal restoration projects. New Orleans (LA): US Department of the Interior, Bureau of Ocean Energy Management. 54 p. Contract No.: M15AC00013. Report No.: OCS Study BOEM 2020-035. [https://espis.boem.gov/final%20reports/BOEM\\_2020-035.pdf](https://espis.boem.gov/final%20reports/BOEM_2020-035.pdf) U.S. GAO. Offshore Oil and Gas: Updated Regulations Needed to Improve Pipeline Oversight and Decommissioning. GAO-21-293 <https://www.gao.gov/assets/gao-21-293.pdf> Arnold, John A. "A Thousand Ways Denied: The Environmental Legacy of Oil in Louisiana" LSU Press, 2020. Percy N. Browne, "Synopsis and History of Fresh Water Game Laws of Louisiana," Louisiana Conservationist 2, no. 10 (September 1944): 3. Castor, Rebekah. More insurance companies pull out of Louisiana: 'We are in a crisis' January 2023. Fox Business. <https://www.foxbusiness.com/features/more-insurance-companies-pull-out-louisiana-crisis> Smith, Mike. This study has seen the future of Louisiana's coast. It's a sobering glimpse of what's ahead. The Times Picayune. February 2024. [https://www.nola.com/news/environment/new-study-sees-the-sobering-future-of-louisianas-coast/article\\_2a27f818-cb7d-11ee-a5b0-736ab3036500.html?utm\\_medium=social&utm\\_source=twitter&utm\\_campaign=user-share](https://www.nola.com/news/environment/new-study-sees-the-sobering-future-of-louisianas-coast/article_2a27f818-cb7d-11ee-a5b0-736ab3036500.html?utm_medium=social&utm_source=twitter&utm_campaign=user-share) Morgan Nicole Crutcher. Building the Plane We're Flying: Challenges and Opportunities in Louisiana Coastal Restoration and Protection. A thesis submitted in partial fulfillment of the requirements for the degree of Master of Science (School of Natural Resources and the Environment) University of Michigan August 2011. <https://deepblue.lib.umich.edu/bitstream/handle/2027.42/85798/Morgan%20Crutcher%20Thesis%20Final%20August%2016%202011%20pdf.pdf?sequence=1&isAllowed=y> Sneath, Sarah. Louisiana needs sand to rebuild its coast. Old oil and gas pipelines are blocking the way. August 2021. Washington Post. <https://www.washingtonpost.com/climate-environment/2021/08/05/louisiana-gulf-abandoned-pipelines/> Biven, Megan. Dredging Up

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**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)?

Virtual,In-Person

185. Good Morning,

Please see attached for our comments on EO-JML-13. Thank you for your time and consideration. Please let us know if you have any questions.

Kind regards,

Megan Biven

True Transition

[megan@truetransition.org](mailto:megan@truetransition.org)



VIA EMAIL TO [DRIVEINITIATIVE@LA.GOV](mailto:DRIVEINITIATIVE@LA.GOV) AND [TYLER.GRAY@LA.GOV](mailto:TYLER.GRAY@LA.GOV)

February 21, 2024

The Honorable Jeff Landry  
Governor of Louisiana  
PO Box 94004  
Baton Rouge, LA 70804

Mr. Tyler Gray  
Secretary of  
Louisiana Department of Energy and Natural Resources  
Office of the Secretary  
P.O. Box 94396 Baton Rouge, LA 70804

Re: Comment on Executive Order JML-13

Dear Governor Landry & Secretary Gray,

Please accept the following comments submitted on behalf of True Transition. We appreciate the opportunity to provide these comments in response to the Office of the Governor's request for public comment. True Transition connects research to the challenges facing working people in the energy sector to build worker power, ensure safe and healthy working conditions, energy security, and shared prosperity.

The Coastal Protection and Restoration Authority (CPRA) is a critical institution in Louisiana's fight to save our coast and protect our coastal and inland communities. Louisiana previously suffered under the dysfunction of agencies with competing missions and an incoherent and at odds coastal management program. The CPRA is a bipartisan success story in imposing order upon chaos. Top-down executive level leadership at the state level facilitated an increase in coordination between multiple levels of government and markedly improved government efficiency.

Coastal restoration is an evolving field. The scale of Louisiana's coastal mission is so massive and unprecedented, that we are literally building the plane as we are flying it. The Governor's Advisory Commission on Coastal Protection, Restoration and Conservation ensures that the practitioners of this plan are not siloed in Baton Rouge, but instead in communication with the latest engineering and science developments in real time. We understand the desire to accelerate the progress that has been made, but we would caution putting CPRA back under the Department of Energy and Natural Resources. It is critical that the CPRA maintains its autonomy and crystal clear mandate. It is critical that coastal restoration remains our state's primary mission and priority.

We have formatted our comments to conform to the format requested on the Public Comment Portal.



### **What is the specific issue you are addressing?**

These comments are in reference to the potential reorganization of the Coastal Protection and Restoration Authority. We are concerned that if the Coastal Protection and Restoration Authority is folded back under the Department of Energy and Natural Resources roof, its mission will be muddled and its mandate weakened.

The author of this comment has some relevant background she would like to share that leads her to this conclusion. I used to work for the Bureau of Ocean Energy Management where among other tasks I helped plan oil and gas lease sales for the United States government primarily off the coast of Louisiana. BOEM and BSEE process dozens of seismic, drilling and exploration permits a week. It also manages the nation's Marine Minerals Program - a program critical to states like Louisiana who rely upon the high [quality sediment in federal waters](#) for coastal restoration projects. During the first shale boom, companies began stampeding out of the shallow Gulf, relinquishing their oil and gas leases left and right. They also requested, and more often than not, succeeded in decommissioning their pipelines in place on the seafloor. Now both federal regulation, the lease contract, and federal law require and assume that once commercial activities have ceased, the seafloor will be cleared of all obstructions. Nevertheless, this office allowed companies to [decommission in place](#) thousands of miles of pipeline in a short period.

This was able to happen because the mission for both agencies is and remains to promote expeditious oil and gas development on the OCS. (Contrary to popular rhetoric, staff within the agency have PD's whose salaries and career advancement are explicitly tied to these missions.) The Marine Minerals Program sounded the alarm that these pipelines (of no public use mind you) were located in prime borrow areas. It took several years of internal lobbying to end the practice in high quality borrow areas. It was finally with the intervention and advocacy of the Louisiana Coastal Protection Restoration Authority that the Marine Minerals Program succeeded in adding an additional review to these requests. The U.S. federal government could now decline the request of a transnational firm who wanted to decommission a pipeline in a high value sand area because of the strength of a state agency.

This story has a few lessons. One being that the CPRA has evolved into a powerful and influential organization. With Texas' planned Ike's dike and East Coast states planning their own large scale coastal programs, Louisiana leadership would be making a regrettable decision to relinquish this power and influence. Second, in an organization with competing missions, the one with the incumbent mission will win. There will be conflict. Indeed, in the 1940s, the Louisiana Department of Conservation contained both Minerals and Wildlife divisions which created a great deal of internal conflict, "it is by all now realized that the Conservation of the wildlife has no relation to oil and gas and other minerals and same should be separated in distinct departments. For instance in some cases we see one official in the Wildlife Division making an effort to stop the pollution of a stream by oil or salt water from oil wells when another division of the Department may consider each pollution as temporary and necessary for the production of oil and gas." (September 1944 - Synopsis and History of Fresh Water Game Laws of Louisiana). As a result, on November 7, 1944, Louisiana citizens approved a constitutional amendment that divided the Department of Conservation into three agencies: the Department of Conservation, the Forestry Commission, and the Department of Wildlife and Fisheries. (Arnold, John T, 2020).

### **How has or may it impacted you? Your organization?**

The future of our families and represented stakeholder communities rely upon the success of the Coastal Protection and Restoration Authority. It matters little whether our constituents have a job if they can't secure home insurance.

Additionally, we have found that both upstream and downstream oil and gas employers are whittling down their employment rolls in Louisiana. For Louisiana oil and gas workers, a transition has already begun. Three separate refineries closed in the last three years (firing 2,100 Louisiana workers) bringing the number of refineries in the state down to 15 facilities. But those 15 facilities are distilling more today than when the state boasted 34 refineries. Between 2008 and 2019, direct employment in "Drilling Oil & Gas Wells" crashed by 62% and "Support Activities for Oil & Gas Operation" decreased by 26% in Louisiana. At the same time offshore production in the federal waters of Louisiana increased by 44%. Despite a dramatic increase in production, jobs in production plummeted. In Louisiana, direct upstream and exploration oil and gas sector jobs now account for less than 2% of the total state civilian workforce. The employment trends are plain as day.

We believe that the state master plan project and cleaning up no longer in use oil and gas infrastructure will create durable employment opportunities for displaced oil and gas workers.

**Is the issue a legal one? If so, is it addressed in the constitution?**

Yes. There are several sections within the Louisiana Constitution specifically pertaining to the management of the Coastal Protection and Restoration Fund. It makes clear that the funds shall be administered by the Coastal Protection and Restoration Fund in accordance with the State Master Plan. It is our concern that if the CPRA is subsumed into the DENR with a mandate to promote a "prospective business environment," then its mission and purpose will be compromised. What good is a "prospective business climate" if employees can't secure home [insurance](#) or if businesses and schools will be [underwater](#)? In this moment, we require clarity of purpose and leadership that will not waver.

§10.2. Coastal Protection and Restoration Fund Section 10.2(A) There shall be established in the state treasury the Coastal Protection and Restoration Fund to provide a dedicated, recurring source of revenues for the development and implementation of a program to protect and restore Louisiana's coastal area.

(D) The money in the fund may be appropriated for purposes consistent with the Coastal Protection Plan developed by the Coastal Protection and Restoration Authority, or its successor. No appropriation shall be made from the fund inconsistent with the purposes of the plan.

Additionally, the Louisiana Constitution clearly prioritizes the public benefits derived by coastal restoration and flood protection. For instance, in the cases of State expropriation or action to take private property, a party has the right to trial by jury to determine whether the compensation is just, except in the takings of property for levee and levee drainage purposes or for the purposes of wetland restoration. Please see below:

(E) This Section shall not apply to appropriation of property necessary for levee and levee drainage purposes.

(F) Further, the legislature may place limitations on the extent of recovery for the taking of, or loss or damage to, property rights affected by coastal wetlands conservation, management, preservation, enhancement, creation, or restoration activities.

## **Does it fall under existing statutes? Regulations?**

As your office well knows, the Louisiana Legislature and prior Administrations worked to create a locus of expertise and efficiency. Below is a sampling of the statutes that created the CPRA and the regulations that describe its authorities and powers.

2005 – Act 8 of the First Extraordinary Session of 2005

2008 - Executive Order BJ 2008-7

2009 – Act 523 of the Louisiana Legislature

2012 – Act 604 of the Louisiana Legislature

La. R.S. 49:214.1

La. R.S. 49:214.5.5

La R.S. 49:214.5.6

La. R.S. 49:214.2(3)

La. R.S. 49:214.2(10)

La. R.S. 49:214.5.6 and Article I Section 4 of the Louisiana Constitution

Act 523 of 2009 Regular Legislative Session enacted La. R.S. 49:214.6.9. which grants authority for integrated coastal protection surveying

Acts 2006, No. 626: amended La. R.S. 41:1702(D)(2)

**Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.**

Executive Order JML-2413 hints at tucking the CPRA back under the weight of competing missions as to create “a better prospective business climate.” It is not only a departure from consensus, but a retreat from the fight. Prior to 2005, Louisiana’s attempts to stave off this inundation were scattered and inadequate.

The Louisiana State and Local Coastal Resources Management Act (Act 361) was passed in 1978 to regulate the activities that affect wetland loss and allowed parishes to apply for their own permitting program. The resulting Louisiana Coastal Resources Program (LCRP) became a federally approved coastal zone management program in 1980.

Authorized by Congress in 1990, the Louisiana Coastal Wetland Conservation and Restoration Management Act took several important steps towards building state capacity. It brought the LCRP, Louisiana’s federally approved coastal management program under the management of the DNR. It then tasked the DNR with creating a comprehensive coastal restoration plan and created the Coastal Restoration Division (CRD) to house the expertise to do so. It also created a fund, the Wetland Conservation and Restoration Fund (Wetland Trust Fund). Monies for the fund continue to accrue from taxes on oil and gas activities and are devoted specifically to CRD projects within the comprehensive plan. It also created a state level authority, the Wetlands Conservation and Restoration Authority (WCRA), to oversee the pla.

Within a year, a related federal bill, the Coastal Wetlands Planning, Protection, and Restoration Act (CWPPRA), was passed. It provided for 75/25 federal/state cost sharing. Although some of the money is directed towards other states, a majority of the funds – created from taxing fishing equipment, motorboats, and engine fuel – is dedicated to Louisiana. The state receives approximately \$50 million annually (National Research Council, 2005). Approximately 30% goes towards the National Coastal Wetlands Conservation Grant Program and the North American Wetlands Conservation Fund. The other 70% goes towards the Army Corps of Engineers for construction and other associated activities in the Louisiana coast. The Breaux Act, as it is called in Louisiana after its sponsor the popular and longtime

senator John Breaux, created a state and federal collaborative called the Breaux Act Task Force to oversee the development of a comprehensive restoration plan.

This plan stipulated that any and all programs affecting coastal wetlands would be consistent with its purposes yet gave no procedural guidance on how to do so and was not enforced (Coastal 2050, 1998). The model for restoration set by the Breaux Act Task Force continues to be used today, amidst some controversy. Annually, the Breaux Act Task Force submits a Project Priority List (PPL) to Congress.

Before the CPRA was created, the DOTD was responsible for hurricane protection (predominately via levee building), and the LDNR was responsible for coastal restoration. There was an identified need for increased cooperation between the two agencies, but sufficient and necessary incentive did not yet exist to overcome barriers preventing a voluntary formal agreement between the two agencies. Coastal restoration and protection projects competed for funds through the same funding processes, on the federal level through the Water Resources Development Act and similarly at the state level within appropriative committees of the legislature. The two agencies were not only adversarial in terms of funding, but also differed procedurally. Communication between the two was limited. Talks meant to bring about improved coordination and possible merger between the two agencies ended with no finished product largely due to disagreement concerning funding.

The Water Resources Development Act (WRDA) authorizes but does not fund projects. Funding comes later through the appropriations process, specifically the Energy and Water Development Appropriations bill. Louisiana frequently found itself in competition with Florida, whose comprehensive Everglades Restoration Project put it on stronger footing with federal partners.

The 2005 hurricane season reinforced the importance of comprehensive planning to decision-makers and brought back Coastal 2050-like initiatives only with a greater sense of urgency: regional public meetings, reducing the number of planning units, consolidating cumbersome political jurisdictions, building state capacity through strong leadership at the executive level and technical expertise, and addressing linkages among coastal activities at all possible levels. Most importantly, it brought the activities of the DNR and the DOTD under one roof which would allow the state to act as a full partner to the Corps, not just a consumer of services.

The original statute passed in 1989, about 16 years previous, reads “efforts by the state to address the myriad interrelated problems of coastal land loss have been inadequate, fragmented, uncoordinated, and lacking in focus and strong direction.” The goal of the original authority was to strike a “balance between development and conservation”(La. R.S. 49:213:1(C)).

The Louisiana Legislature created the [Louisiana Coastal Protection and Restoration Authority \(CPRA\)](#) to elevate the coastal crisis to the appropriate level and end the confusion once and for all. With the state’s experts finally sitting in one room, we also got our first comprehensive [plan](#) to save our coast. This was critical in helping Louisiana secure a larger share of the royalties from oil and gas produced off our coast. In the late Morgan Nicole Crutcher’s [graduate thesis](#), she explains the history and challenges faced by the CPRA. She interviewed a variety of Louisiana officials who participated in the process who explained how prior dysfunctions gave rise to a new culture that was akin to 1960s NASA. With the CPRA, Louisiana has been able to create a structure and organization capable of meeting the monumental task in front of it. As one contributor to the State Plan explained to her, “It gave us the opportunity...to go to Washington with a document in hand and say, ‘Look, Louisiana is serious. We are moving forward with

or without the help of the federal government or the ability of the Corps of Engineers to move forward in a timely fashion. We have chosen to take control of our own destiny.”

For a detailed history of Louisiana coastal restoration prior to the CPRA with specific dates and statutes, we highly recommend you review Morgan Crutcher’s thesis: <https://deepblue.lib.umich.edu/bitstream/handle/2027.42/85798/Morgan%20Crutcher%20Thesis%20Final%20August%2016%202011%20pdf.pdf?sequence=1&isAllowed=y>

**Did the program your comment concerns change over time? Did it evolve into associated programs?**

Yes, as the above comments speak to the Coastal Protection Restoration Authority grew out of a moment of crisis and a legacy of disorder. The CPRA has quickly grown into one of the nation’s most sophisticated and coherent large-scale restoration programs.

Louisiana’s future business and economic prospects have a hard stop unless we appropriately address our coastal crisis. It is also true that the CPRA is not enough. There are material constraints to Louisiana achieving the task in front of it. We offer four recommendations in addressing some of them.

1. **Work with the Department of the Interior** to fully remove decommissioned in place pipelines on our coast. The Bureau of Safety and Environmental Enforcement has allowed transnational companies to leave [97% of pipelines](#) (18,000 miles) on the seafloor on Louisiana’s coast. While these pipelines no longer transport oil or gas, they do obstruct [Louisiana’s access to sand](#) for coastal restoration projects. The Secretary of the Interior has not exercised her authority to order those pipeline’s removal. But your Administration’s governance and leadership could force the action. It could also put Louisiana workers and vessels to work today, while clearing CPRA’s path to access that sand for our coast.
2. **Lead the fight to restore the public dredge fleet.** You can’t win a fight with one arm tied behind your back, and Louisiana has both arms tied. The United States used to lead the world in dredging technology to ensure that our 12,000 miles of inland and intracoastal waterways were navigable, our 180 ports accessible, and our 95,471 miles of shoreline and beaches nourished. Indeed, at its height the U.S. Corps built 150 dredges between 1899 and 1949. Today, American cities and even Corps districts squabble for access to a small and outdated fleet. Why? Because a [cartel of companies](#) bought some senators in the 1970s and forced the Corps to mothball its fleet and use only vessels owned by these same companies. While Louisiana is waiting, China is building. In the last twenty years China has built over [20 jumbo trailing suction hopper dredgers](#) and launched at least 44 large cutter suction dredgers. As China is literally shaping the world, we are just accepting a condition a few bribed and long dead Senators forced upon us. But you could lead the fight to restore the public dredge fleet. We don’t rent firetrucks or tanks, nor should we rent this critical piece of equipment. We could build many of the new fleet in Louisiana shipyards, with one or two permanently docked at our coast to do the necessary work of rebuilding our state’s coast.
3. **Be a leading negotiator** at the [Lower Mississippi River Comprehensive Management Study](#). Louisiana is a creation of the Mississippi River. Whether it’s the 40 thousand plus locks and dams holding back [sediment](#) or big-ag failing to prevent [nutrient runoff](#), it all runs downstream and impacts our industries and communities. Louisiana must place priority on participating in this process and advocate for the overall health of the Mississippi River Basin.

4. **Put Louisianans back to work** plugging oil and gas wells and refilling pipeline canals. Louisiana could receive a total \$206.5 million in Infrastructure Investment and Jobs Act of 2021 (IIJA) funds to clean up their orphaned wells. This includes \$25 million in initial grants, \$111.5 million in formula grants and up to \$70 million in performance grants. Louisiana is also eligible for \$15.7 million in plug marginal wells to reduce methane emissions. This funding is crucial but will only address a part of Louisiana’s total unplugged, non-producing inventory of wells (not to mention that dozens of new wells are orphaned every [month](#)). Louisiana’s coastal crisis and remediation of retired oil and gas liabilities are not mutually exclusive activities. Between 1937 and 1977, more than 6,300 exploratory wells and more than 21,000 development wells were drilled in Louisiana’s eight southernmost parishes. [Agerton et. al](#) estimate that just under 5,000 of Louisiana’s unplugged wells are currently situated in Louisiana’s wetlands and inland waterways and 2,612 unplugged wells in Louisiana state waters.

In our [national survey of oil and gas workers](#), we found that just under half (44%) of Louisiana-based survey respondents said they had been let go at least once prior to 2020 and 15% reported having been let go more than once. This bears out in the employment data. Between 2008 and 2019, direct employment in “Drilling Oil & Gas Wells” crashed by 62% and “Support Activities for Oil & Gas Operation” decreased by 26% in Louisiana. At the same time offshore production in the federal waters of Louisiana increased by 44%. Despite a dramatic increase in production, jobs in production plummeted. In Louisiana, direct upstream and exploration oil and gas sector jobs now account for less than 2% of the total state civilian workforce. And that number is only decreasing. With advances in oil and gas drilling technology (laterals and automation), the upstream oil and gas industry is leaner. But Louisianans with expertise and oilfield experience are an asset waiting to be put to use. Addressing no longer in use oil and gas wells in the coastal zone (including offshore) could create tens of thousands of jobs. Louisiana could lead the nation in well plugging and restoration and remove the obstacles in the way of full coastal remediation.

### **Provide historical context and perspective.**

OCS Pipelines: When an oil and gas operator signs a lease with BOEM, they agree to remove all equipment and clear the seafloor when the infrastructure is no longer useful for operation.<sup>1</sup> The Secretary has the authority to unilaterally determine infrastructure is no longer useful for operation.<sup>2</sup> The operator then has one year to remove its equipment.<sup>3</sup> The Bureau of Safety and Environmental Enforcement has allowed the offshore oil and gas industry to leave 97% of pipelines (18,000 miles) on the seafloor when no longer in use.<sup>4</sup> Aging oil and gas infrastructure is inhibiting access to offshore sand resources for coastal restoration. 30 CFR § 250.1754 establishes clear authority to the BSEE Regional Supervisor to order the removal of a pipeline decommissioned in place if that pipeline constitutes an obstruction. These pipelines provide no physical or material benefit to the American public, but they do impose an artificial limit on how much sand is available for coastal restoration.

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<sup>1</sup> BOEM, “OIL AND GAS LEASE OF SUBMERGED LANDS UNDER THE OUTER CONTINENTAL SHELF LANDS ACT,” Sec. 22(a),

<https://www.boem.gov/sites/default/files/about-boem/Procurement-Business-Opportunities/BOEM-OCS-Operation-Forms/BOEM-2005.pdf>.

<sup>2</sup> *Id.* at Sec. 22(b).

<sup>3</sup> *Id.* at Sec. 22(c).

<sup>4</sup> U.S. Government Accountability Office, “Offshore Oil and Gas: Updated Regulations Needed to Improve Pipeline Oversight and Decommissioning,” March 19, 2021, <https://www.gao.gov/products/gao-21-293>.



Dredge Fleet: Failures of private firms to fulfill urgent channel deepening contracts in New York Harbor and the subsequent dearth of bidders on new contracts produced a situation which demanded a public option. In 1902, the federal government initiated a program of hopper dredge construction, adding 16 vessels to the dredging fleet by 1908. Public hopper dredges operated in the coastal waters of the Atlantic and the Pacific, in the Mississippi River Passes and in the Great Lakes. Recognizing the need for a central design agency to develop the plant and programs of a growing dredging fleet, the Secretary of War in 1908 established a Marine Division in the Office of the Chief of Engineers in Washington, D.C.<sup>5</sup> This design group made significant contributions to the development of dredge pumps and other specialized machinery, and the first diesel-electric dredges were designed and built in 1918. The hopper dredge soon developed into a complex specialized vessel requiring maintenance and occasional updating and conversion. In total the Corps built 150 dredges of various types and purposes between 1899 and 1949.<sup>6</sup> Until the 1960s, the nation's development of Federal navigation waterways and port access channels was primarily accomplished by the Corps dredging fleet. Then, in the mid-1960s, the Corps was faced with replacing aging dredges and Congress slowed its investment in deeper ports and channels. Total dredging (performed by both government and private industry) began to decline significantly, dropping from 480 million cubic yards in 1963 to 282 million in 1979.

In his official military memoir, Lieutenant General John W. Morris described how during his tenure there had been no public works authorization bill, or omnibus bill, and many projects had been waiting for funding for years.<sup>7</sup> In 1972, Congress imposed a multi-year dredge moratorium - intentionally holding funds for replacement of public dredges hostage until a "National Dredging Study" on privatizing the fleet was completed. Meanwhile, private industry was actively lobbying Congress to choke the Corps of appropriations for the modernization and replacement of dredges in the Corps fleet. John A. Downs, then-President of Chicago's Great Lakes Dredge & Dock and the President of the National Association of Dredging Contractors, testified in several Congressional appropriations committee hearings to not fund or replace existing Corps hopper dredge vessels and that if the government even considered replacement it should first consult industry.<sup>8</sup> Essentially, private industry was directing Congress (and succeeding) to hold dredging funding hostage.

In 1976, the Senate Committee on Environment and Public Works Subcommittee on Water Resources held a hearing on proposed legislation, H.R. 7744, to privatize the public dredge fleet.<sup>9</sup> Critics were

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<sup>5</sup> U.S. Army Corps of Engineers. (1954). *The Hopper Dredge: Its History Development and Operation*.

[https://books.google.at/books?id=4k0sAAAAYAAJ&pg=PA13&lpg=PA13&dq=history+corps+dredge+fleet&source=bl&ots=lu7GfPdEIJU&sig=ACfU3U0v\\_3QxKcxggvbmHe0rluKhg-3FpO&hl=en&sa=X&ved=2ahUKEwjZ8lv\\_rKvpAhUxtHEKH0-ZAC8Q6AEwBnoECAgQAQ#v=onepage&q&f=false](https://books.google.at/books?id=4k0sAAAAYAAJ&pg=PA13&lpg=PA13&dq=history+corps+dredge+fleet&source=bl&ots=lu7GfPdEIJU&sig=ACfU3U0v_3QxKcxggvbmHe0rluKhg-3FpO&hl=en&sa=X&ved=2ahUKEwjZ8lv_rKvpAhUxtHEKH0-ZAC8Q6AEwBnoECAgQAQ#v=onepage&q&f=false)

<sup>6</sup> Colton, Tim. (2016). *U.S. Army Corps of Engineers - Dredges*. U.S. Army Corps of Engineers - Dredges

Most recent update: December 1, 2016. <http://shipbuildinghistory.com/smallships/armycorpsdr.htm>

<sup>7</sup> U.S. Defense Technical Information Archive. (2000). DTIC ADA392660: *Engineer Memoirs. Lieutenant General John W. Morris*.

[https://archive.org/details/DTIC\\_ADA392660/page/n87/mode/2up/search/\(%22dredge+fleet%22+\)?q=%28%22dredge+fleet%22+%29](https://archive.org/details/DTIC_ADA392660/page/n87/mode/2up/search/(%22dredge+fleet%22+)?q=%28%22dredge+fleet%22+%29)

<sup>8</sup> United States. Congress. Senate. Committee on Appropriations. (1975). *Public works for water and power development and energy research appropriations for fiscal year 1976: hearings before a subcommittee of the Committee on Appropriations, United States Senate, Ninety-fourth Congress, first session on H.R. 8122* .... Washington: U.S. Govt. Print. Off.

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<sup>9</sup> United States. Congress. Senate. Committee on Environment and Public Works. Subcommittee on Water Resources. (1978). *Contract dredging: hearing before the Subcommittee on Water Resources of the Committee on Environment and Public Works, United States Senate, Ninety-fifth Congress, second session, on H.R. 7744* ... January 24, 1978. Washington: U.S. Govt. Print. Off.

<https://hdl.handle.net/2027/mdp.39015078591404?urlappend=%3Bseq=75> (Author's Note: the page is cited exclusively from this 1978 Committee debate)

incredulous, while defenders were dismissive, evoking now familiar rhetoric on smaller government and an almost naive faith that ‘it will just work out.’ A private consultancy’s study on privatizing the public fleet forecasted that American citizens would pay between 20 and 26 percent more for industry to do all of the necessary work versus an exclusive Corps fleet. When the Corps and industry were grilled on the rate forecasts, the answers were evasive explaining that the Corps “expect[ed] that the extensive competition which has been available in the past will continue to be available, which should keep the contract bids within a reasonable range.” No evidence was presented to support this claim.

Congress passed the Minimum Fleet Legislation Public Law 95-269 of April 26, 1978. The new policy directed the Corps to utilize its own fleet only when a private bid *exceeded* the government bid by 25 percent (there’s those forecast figures put to use). Since the 1990s, Congress has passed several rounds of legislation that have effectively crippled public dredging capacity and placed American ports, inland waterways and coasts at the mercy of just five companies. The *Wheeler*, a Corps’ hopper dredge built in the Avondale shipyard specifically to maintain navigation for the Mississippi River Head of Passes, had its workday schedule limited to only 55 workdays per year plus emergencies (ready-reserve status). For context, the Corps estimates that it spends \$12.5 million annually to maintain the *Wheeler* in ready reserve status, of which \$8.4 million is needed to cover the costs incurred when the vessel is idle.<sup>10</sup>

Three separate chairs of that subcommittee sponsored legislation placing restrictions on the Corps dredge fleet. Each Congressman, John Meyers, Tom Bevill and H.L. Callahan, would leave their careers in government service to work for a government relations firm, Dawsons & Associates, where each would work as a lobbyist representing the same dredging company, Chicago-based Great Lakes Dredge and Dock.<sup>11</sup> . In less than ten years, prices had increased by over 117%, but the amount dredged had only increased 9%. And while the \$/cubic yard figures appear modest (\$2.57/cubic yard in 2003 and \$5.13/cubic yard in 2012), the impacts on total dredged material are not. Louisiana is forced to adjust its large-scale ambitions because of cronyism.

Orphan Wells: Between 1999 and 2022, Louisiana’s OSR program plugged 1,758 orphaned wells.<sup>12</sup> In that same time period, 5,629 new oil and gas wells were orphaned under the oversight of the Louisiana Department of Energy and Natural Resources. Louisiana’s DNR currently lists 4,533 orphaned wells. In some regions, orphan well inventories are the relics of industry from over a century ago. But Louisiana’s ever ballooning orphan well inventories are the discards of modern oil and gas producers. While Louisiana’s OSR program successfully plugged 120 wells between January and March 2023, in the same period, an additional 150 wells were orphaned.<sup>13</sup>

### **Why should your proposed changes be implemented?**

Because we all care about the future of Louisiana and they are necessary for its survival.

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<sup>10</sup> USACE, Report To Congress: Hopper Dredges, June 3, 2005, <http://www.aapa-ports.org/files/PDFs/reporttocongress3Junefinal3nov05.pdf>

<sup>11</sup> Santos, Adolfo. (2005). Do Members of Congress Reward Their Future Employers?: Evaluating the Revolving Door Syndrome. University Press of America.

<sup>12</sup> All new orphaned well counts and OSR P&A counts come from the Louisiana Performance Accountability System. <https://www.doa.la.gov/doa/opb/performance/lapas/>

<sup>13</sup> Upton, Greg. Progress Report: Oilfield Site Restoration using IJA Funds. March 31, 2023 <https://www.lsu.edu/ces/publications/2023/osrprogressreport.pdf>



### **Use specific details to support the case.**

Louisiana needs a strong central authority with a clear mandate. The Coastal Protection and Restoration Authority and its Board are the result of bipartisan planning and agreement and the will of the Louisiana public. It has formed the institutional knowledge and processes that will be key in achieving our coastal and storm protection goals. Other state actions and agencies should not pursue policies that undermine or harm our coastal restoration plan. The current CPRA structure and autonomy are designed to prevent these scenarios. The expertise provided by the Governor's Advisory Commission on Coastal Protection, Restoration and Conservation ensures the State's Coastal Master Plan is nimble and the Governor's Office can act based on the latest engineering and scientific advances.

We leave a quote from the 1910 Louisiana Conservation Commission (DNR and Wildlife and Fisheries predecessor). Even over a century ago, our leadership understood that Louisiana's rare bounty was something to protect. We have an obligation to our children and grandchildren to restore this paradise before it's lost.

“In the case of those who look alone to their own profits, totally regardless of public welfare, the law must enter on behalf of the public, and regulation the operation of this class. The operator in natural resources, who operates solely for his own profit and without regard to the effect of his operation on the public welfare proceeds on the theory that thwart he has bought and paid for, he may do with as he pleases. He is wrong. It is the principle of law necessarily adopted by men when they associate themselves together in government, that the rights of the individual must necessarily be limited by the rights of his fellow individual. To say that a man may do what he pleases with his own is denied in a thousand ways, not only by law, but by custom and even public opinion.”

### **Reference relevant citations to strengthen your argument.**

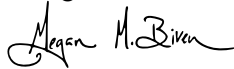
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18. Baurick, Tristan. 'It's too far gone': Old oil wells and pipelines doom big effort to save this Louisiana island. The Times Picayune. May 2020. [https://www.nola.com/news/environment/its-too-far-gone-old-oil-wells-and-pipelines-doom-big-effort-to-save-this/article\\_7c9bfb34-9c6b-11ea-819e-d32606b97a31.html](https://www.nola.com/news/environment/its-too-far-gone-old-oil-wells-and-pipelines-doom-big-effort-to-save-this/article_7c9bfb34-9c6b-11ea-819e-d32606b97a31.html)
19. Leo Lindner and Megan Biven. The Future of Energy & Work in the United States: The American Oil & Gas Worker Survey. True Transition. March 2023. [https://www.truetransition.org/\\_files/ugd/0ad80c\\_069ea867b3f044afba4dae2a1da8d737.pdf?index=true](https://www.truetransition.org/_files/ugd/0ad80c_069ea867b3f044afba4dae2a1da8d737.pdf?index=true)
20. U.S. Energy Information Administration. Louisiana Number and Capacity of Petroleum Refineries. [https://www.eia.gov/dnav/pet/pet\\_pnp\\_cap1\\_dcu\\_SLA\\_a.htm](https://www.eia.gov/dnav/pet/pet_pnp_cap1_dcu_SLA_a.htm)
21. In 1982, 34 Louisiana refineries distilled 2,506,871 barrels per day, and in 2022, 15 refineries are distilling 2,922,541 barrels per day. [https://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=PET&s=8\\_NA\\_8D0\\_SLA\\_4&f=A](https://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=PET&s=8_NA_8D0_SLA_4&f=A)

22. Upstream employment figures from ICF (on behalf of The Louisiana Mid-Continent Oil & Gas Association (LMOGA) & American Petroleum Institute (API)) “The Economic Impact of the Oil and Natural Gas Industry in Louisiana” (October 2020) <https://www.lmoga.com/assets/uploads/documents/LM>
23. US Bureau of Labor Statistics. Louisiana at a Glance. <https://www.bls.gov/eag/eag.la.htm>; Louisiana Workforce Information Review 2021
24. Statewide Report. Louisiana Workforce Commission. [https://www.dol.gov/sites/dolgov/files/eta/Performance/pdfs/annual\\_economic\\_reports/2021/LA%20PY%2020%20--%20Workforce%20Information%20Review%202021.pdf](https://www.dol.gov/sites/dolgov/files/eta/Performance/pdfs/annual_economic_reports/2021/LA%20PY%2020%20--%20Workforce%20Information%20Review%202021.pdf)
25. *Report of the Louisiana Conservation Commission of 1910-1912. 9.*

Thank you for your time, dedication, and consideration of our comments.

Sincerely,  
Megan Biven



True Transition

186. **Stakeholder Information:**

Full Name: Sandy Denapolis-Bosarge

Louisiana Resident: Yes

E-Mail Address: sdenapolis@yahoo.com

Organization (if applicable): River Region Republican Women

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Merging Coastal Protection and Restoration Authority and its board with Louisiana Department of Energy and Natural Resources

How has or may it impacted you? Your organization? I am a concern citizen opposed to this merger. I feel it would greatly dilute the CPRA and its mission is separate and apart from that if the Department.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? Organizational not legal issue

Does it fall under existing statutes? Regulations? No this is proposed Executive Order from Governor Landry

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. For nearly two decades, the CRPA has been a stand-alone agency in charge of coastal protection.

Did the program your comment concerns change over time? Did it evolve into associated programs? Yes. For example, two years ago, the CRPA assumed control of the 15 BILLION dollar hurricane protection system from the Army Corps of Engineers.

Provide historical context and perspective. The CRPA has been instrumental in coordinating with the federal government in funding coastal and levee protection for southeast Louisiana.

**Conclusion**

Why should your proposed changes be implemented? I oppose thud proposed change. Leave the CRPA as a separate agency.

Use specific details to support the case. If "it ain't broke...don't fix it"!

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

187. Please do not go along with the governor's plan to consolidate the Coastal Protection and Restoration Authority into the Department of Energy and Natural Resources. The current structure keeps us safe from storms and protects us.

Marie Gould

[marie@lostlandstours.org](mailto:marie@lostlandstours.org)

188. **Stakeholder Information:**

Full Name: Kendall A. Gaddy

Louisiana Resident: Yes

E-Mail Address: gaddyk16@gmail.com

Organization (if applicable): Former Board member Southeast Louisiana Flood Protection Authority - West

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Objection to agency consolidation proposal

How has or may it impacted you? Your organization? This proposal adds government bureaucracy and inter-agency competition.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented? I am absolutely opposed to consolidating CPRA within LDENR. This proposal to set up a mega-bureaucracy appears to be pure political maneuvering. Louisiana's CPRA has been nationally recognized as the gold standard in the fight against coastal land loss. To restructure this agency at this critical time risks de-prioritizing and diluting its proven effectiveness, independence and standing. Furthermore, such restructuring appears counterproductive to CPRA's fundamental purpose and operational efficiency by setting up potential inter-agency conflicts of interest, more competition for funding and adding more layers of government bureaucracy.

Use specific details to support the case. CPRA was founded to be an independent government agency overseen by credentialed experts and supplemented by input from nationally recognized professional organizations. The public demanded this independence and accountability after Hurricane Katrina and the BP oil spill. It is difficult to see how reducing valuable input from credentialed experts is beneficial to the state of Louisiana—especially if the experts are not compensated.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

189. To whom it may concern,

I'm writing to express my opposition to consolidation of the Louisiana Coastal Protection and Restoration Authority in to the DENR. As you know, coastal land loss is one of the most pressing issues facing Louisiana today. Without a healthy coast, the impact of hurricanes and other weather events will continue to increase in severity, making Louisiana a more challenging place to live and do business. Beyond that, our biologically unique and beautiful coast is one of the state's most valuable assets and enables Louisiana's way of life and worldwide reputation as the Sportsman's Paradise.

It is imperative for the quality of life and economic competitiveness of Louisiana that we have a State level agency focused on the objective of protecting and restoring our coast. I urge you to spend more time studying the potential consequences of this agency consolidation initiative and to solicit public input as part of the process. I think you will find that coastal protection and restoration is a critical issue that unites all Louisianans.

Sincerely,

Sam Miles | Vice President, Corporate Development

INTERNATIONAL-MATEX TANK TERMINALS

400 Poydras Street, Suite 3000

New Orleans, LA 70130

Office (504) 619-2322

Cell (423) 653-2817

Email [SamMiles@imtt.com](mailto:SamMiles@imtt.com)

190. **Stakeholder Information:**

Full Name: Barbara Johnson

Louisiana Resident: Yes

E-Mail Address: barbara@thegreatdeltatours.com

Organization (if applicable): The Great Delta Tours

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? The proposed merger of Department of Natural Resources(DNR) and the Coastal Restoration Protection Authority (CPRA)

How has or may it impacted you? Your organization? Coastal land loss is an existential threat to every resident and business in Louisiana. This enormous challenge, however, also provides significant economic development opportunities for local communities and the state of Louisiana. It is essential, as established after Hurricane Katrina devastated south Louisiana in 2005, that the state designate one organization at the highest level of state government, directly reporting to the Governor, whose sole purpose is to address both coastal wetlands restoration and the physical infrastructure required to reduce flooding and increase hurricane projection in the state. Over 1 billion dollars is being invested annually in rebuilding wetlands and flood protection in Louisiana. This is an investment that is creating thousands of jobs annually, diversifying the state's economy and supporting local companies throughout the state. Because of the scale of the threat to Louisiana's future, as well as the potential for business growth, it is essential that the organizational structure and mandate be laser-focused and come from the highest levels of government in Louisiana. The people of Louisiana have consistently supported the state's coastal restoration strategy in polls that indicate over a 70% support rate for investing in coastal restoration as a top state priority since 2007 . The organizational structure and leadership need to reflect this mandate from the people of Louisiana

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? It is legal in that the organizational structure needs to reflect a mandate, focus, funding and leadership from the Governor's Office.

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective. After Hurricane Katrina, the state was mandated to consolidate organizations to have one voice, organization, game plan and focus for coastal restoration and flood protection.

**Conclusion**

Why should your proposed changes be implemented? It is critical that the state of Louisiana be laser-focused with the organizational power, leadership and funding to strategically implement effective coastal restoration and risk reduction projects in the state.

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

191. **Stakeholder Information:**

Full Name: Sandra Keegan

Louisiana Resident: Yes

E-Mail Address: sandra@forrester.eu

Organization (if applicable): Retired

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? The proposal to consolidate the Coastal Protection and Restoration Authority with the Louisiana Department of Energy and Natural Resources. In addition, the proposal to reduce the number of board members and advisors at the Coastal Protection and Restoration Authority.

How has or may it impacted you? Your organization? As a native born Louisianian, I feel strongly that the expert advice and opinions rendered to the two entities are put to best use in each instance separately, and are provided without cost to the two boards. If there is a good case to be made for merging these two boards, I have yet to see it.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. The two boards have operated separately and independently, and the outcomes have been better and well-considered.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective. There are areas of Louisiana which are far more vulnerable to climate eruptions than other areas. The

## Conclusion

Why should your proposed changes be implemented? The proposed merger should be abandoned in favor of retaining the existing boards and their inter-operation. The nature of protecting and restoring Louisiana's coastal marshes and wetlands along with the areas lying close to the Mississippi and Atchafalaya basin deserve particular oversight using specialist expertise. The Louisiana Department of Energy and Natural Resources takes a different point of departure as its overarching aims where protection and restoration of fragile ecological systems may be relegated to second priority status. The Coastal Protection and Restoration Authority will provide necessary authoritative opinions backed up by scientific expertise, at no cost to the state. These authoritative opinions and recommendations can then be examined and discussed by the Louisiana Department of Energy and Natural Resources in light of their overarching statutory aims. As we engineers at South Central Bell used to say, "If it ain't broke, don't fix it."

Use specific details to support the case. The separation of the boards using experts in their respective fields involves no financial outlays for the state in terms of receiving the expert advice and opinions they provide. This strengthens the case for maintaining two separate boards.

Reference relevant citations to strengthen your argument.

## Public Meetings Attendance

Would you be interested in attending stakeholder meeting(s)? Virtual

192. I urge that this proposal not take place for a number of reasons, most specifically the following:

- CPRA must remain an independent agency. The current structure is working to keep us safe from storms and protect our people and economy.
- The current structure keeps politics out of decision-making about what is best for our state's coastal program.
- The state's coastal program has created thousands of jobs. For this reason and others, coastal restoration is strongly supported by voters across the state and has earned virtually unanimous support across multiple administrations and Legislatures.

Of all state agencies that I have had to deal with, CPRA seems to have its act together. They move things effectively and efficiently. I don't see any reason why this move would be a good idea.

Sincerely

Randy Smith

Concerned Citizen

[smittygeauxhard@gmail.com](mailto:smittygeauxhard@gmail.com)

193. This letter is written to state my strong concern and opposition to the changes proposed in Executive Order JML-13.

As a decades-long coastal advocate who has spent her lifetime working to restore Louisiana's greatest asset, it concerns me that the CPRA, a stand alone independent agency under the previous 4 administrations, will possibly not continue in that capacity. The separation from DNR was so to allow the CPRA to work independently on our Coastal wetlands crisis. That



focus allowed for us to finally begin making some progress on a crisis that impacts not only Louisiana but the Nation and the World. I am opposed to the CPRA being placed back under DNR. They are getting the work done and the old adage "if it ain't broke don't try to fix it rings true". Truly baffling why the change is being brought up.

I am opposed to this order. Thank you for your consideration and I ask that these comments be submitted to record.

Sincerely,

Polly Glover

[Pollygl4585@gmail.com](mailto:Pollygl4585@gmail.com)

194. **Stakeholder Information:**

Full Name: Charles F. Speed

Louisiana Resident: Yes

E-Mail Address: CharlieFSpeed@gmail.com

Organization (if applicable): Association for Materials Protection and Performance (AMPP)  
Southeast Louisiana Chapter

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Office of Coastal Restoration should address the potential for corrosion of the bare carbon steel installed in the New Orleans Levee System  
How has or may it impacted you? Your organization? It has been 14 years since the USACE install 80% of the steel pilings in the ground without any reports or technical follow-up. AMPP SELA formerly NACE New Orleans has been unable to find out any information about the potential for significant corrosion. We believe there is a potential for the pilings to corrode after many years which could lead to another levee disaster.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? The decision not to coat the levee piping was against the recommendation of the Levee Boards and the Office of Coastal Restoration.

Does it fall under existing statutes? Regulations? Water act section 1010

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. Some information can be found at [www.AMPP.org/nola](http://www.AMPP.org/nola). SEE COMMUNITIE ACTION

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective. AMPP SELA is a non profit professional society that address corrosion issue.?

**Conclusion**

Why should your proposed changes be implemented? It is too late to coat the buried steel; however, another barrier to corrosion may be applicable I.e. Cathodic Protection

Use specific details to support the case. See the May 2023 National Academy of Science report on bare steel in the ground

Reference relevant citations to strengthen your argument. AMP standards for protecting buried steel

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? In-Person

195. To whom it may concern,

Please find attached public comments on JML-13 from the Coalition to Restore Coastal Louisiana.

Best regards,

James Karst

Director of communications

Coalition to Restore Coastal Louisiana

New Orleans Office: 3801 Canal Street • Suite 400 • New Orleans, LA 70119 • (504) 220-7899

Support CRCL, and together we can build a stronger coast!

[James.karst@crcl.org](mailto:James.karst@crcl.org)



**Board of Directors**

February 20, 2024

Kimberly Reyher  
**Executive Director**

Dear Secretary Gray,

Parker Kilgore  
**Chairman**

We are writing in response to the Landry administration's request for public comment on [JML-13](#), "an initiative to review and consider optimizing various offices, agencies, and authorities" within the Department of Energy and Natural Resources, including, potentially, the state's Coastal Protection and Restoration Authority.

Ashley Liuzza  
**Vice Chair**

Nene Gianfala  
**Treasurer**

The Coalition to Restore Coastal Louisiana, which was incorporated 36 years ago, played a foundational role in the state's coastal program. CRCL's mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. More than 2,300 people volunteered with our organization in 2023, and we reached more than 4,000 others through our advocacy and outreach events. Through our board of directors, Coastal Advisory Council, volunteers and thousands of other supporters, we represent a diverse set of interests across our state.

Will Norman  
**Secretary**

Mindy Nunez Airhart  
Donald Brinkman  
Steve Chustz  
Rob Gardiner  
Sarah Giles  
Brendan Hughes  
Devyani Kar  
Heather Layrisson  
Terrence Lockett  
Sam Miles  
Brock Piglia  
John Ross  
Randy Smith  
Kristian Sonnier  
Beau Tate

Our organization believes consolidating the Coastal Protection and Restoration Authority with the Department of Energy and Natural Resources would not help our state address coastal land loss. CPRA remaining an independent agency that reports directly to the governor ensures its effectiveness and sense of urgency are maintained. The CPRA is a global leader in establishing how coastal protection and restoration are conducted. Placing it within another agency would create additional bureaucracy and may slow project implementation. It would also send the wrong message to coastal communities.

In the influential 1989 paper "Here Today and Gone Tomorrow?", CRCL called for the creation of an independent office of coastal restoration that is accountable solely to the governor, the Legislature and the public, writing:

*This office should combine coastal management, regulatory and restoration functions. ... All existing coastal programs should be transferred to this office. We are therefore not proposing another bureaucratic layer but centralization of all coastal resource operations in this office.*

More than 15 years later, after Hurricanes Katrina and Rita, that office came into being with the creation of the CPRA. The agency has become among the most effective in our state and recognized as a leader around the world, one that has based its decision-making on science. Having its leadership at the governor's office level has been a crucial component of efficient implementation of projects in the short term and is also important to longer-term planning and emergency response.

The CPRA is operating at a record level, with more projects in progress than ever before, and with the largest coastal restoration project in U.S. history finally under construction after decades of planning. Louisiana is making progress in building new land and correcting the fundamental causes of land loss, in large part due to CPRA's independence from other state agencies. Folding the CPRA into DENR runs the risk of slowing this momentum, potentially making the state's work to save coastal wetlands before they disappear *less* efficient.

**3801 Canal Street, Suite 400  
New Orleans, LA 70119  
CRCL.org**



**Board of Directors**

Kimberly Reyher  
**Executive Director**

Parker Kilgore  
**Chairman**

Ashley Liuzza  
**Vice Chair**

Nene Gianfala  
**Treasurer**

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Terrence Lockett  
Sam Miles  
Brock Piglia  
John Ross  
Randy Smith  
Kristian Sonnier  
Beau Tate

There is widespread public support for the coastal program as it now exists, both from the people of Louisiana and from the Legislature. This can be seen in the [independent polling](#) of voters, with more than 90% of them supporting science-based action, and in the unanimous or near-unanimous support for the state's Coastal Master Plan and Annual Plans in recent years. That restoration projects are creating thousands of good-paying jobs is undoubtedly a key component of this support.

We understand that there are inefficiencies in state government and areas in which agencies have competing interests. We recognize that JML-13 was issued to address these issues. However, the CPRA has been a major success story for our state. We are concerned that consolidating the CPRA with DENR without careful study may cause unintended consequences that impede the implementation of restoration projects and threaten funding. For instance, the CPRA has many contractual agreements with parties such as the Army Corps of Engineers, the RESTORE Council and landowners across the state as the "single state authority" on coastal projects. Restructuring the CPRA could require the renegotiation of these contracts and other agreements, which could jeopardize project implementation and the state's credibility with partners.

While we recognize that change is inevitable, we think it's important to ask why this change is being proposed. What problem is it seeking to solve? If any changes are to be made, we believe they should *accelerate* the momentum of coastal restoration along our coast, not potentially slow it. With every delay, we lose more land.

We also consider public input critical to this process and hope that it is adequately considered before a decision is made. Public support for coastal restoration has been a driving factor in the successes we are seeing. Communities are invested and engaged in the work. Their input must be considered.

The bottom line is that the restoration of our coast is too important to enact swift changes such as this proposed consolidation.

We look forward to the specifics of the Feb. 23 report on the proposed consolidation. At this juncture, we urge the administration to maintain the CPRA as a separate agency, ensuring that project timelines are not extended and that the coastal program remains a top priority within the governor's office.

We appreciate the opportunity to provide comments, and we look forward to working with you to protect our residents and our coastal resources.

Sincerely,

Kimberly Davis Reyher  
Executive Director

Parker Kilgore  
Board Chairman

196. Please see comments below...

----- Forwarded Message -----

From: Ivy Mathieu <[ivy\\_mathieu@yahoo.com](mailto:ivy_mathieu@yahoo.com)>

To: [driveinitiative@la.gov](mailto:driveinitiative@la.gov) <[driveinitiative@la.gov](mailto:driveinitiative@la.gov)>

Sent: Tuesday, February 20, 2024 at 03:27:04 PM CST

Subject: Public Comment re Consolidating the CPRA into Dept of Energy & Natural Resources

I am vehemently against merging CPRA with the Dept of Energy and Natural Resources. The eroding coastline doesn't need this political intervention under the guise of efficiency. The haphazard method of merging key agencies without studying the impact is ill advise. There should be clear articulated reasons for this and any other proposed changes going forward.

CPRA should continue to operate independent in designing and planning what is best for Louisianans to remain in place and earn a living near the coast without undue influence of the industries that created this coastal erosion crisis. Also, there needs to be a focus on talent that is outside of the oil and gas industry to lead these government agencies. Because we need and deserve a real shot in preserving our land, water, air, culture, languages, Creole, Cajun, & Indigenous heritage by thoughtful leadership who centers our needs above the industrial complexes that have scared the aforementioned without having to pay any real financial or reputational cost, including being held liable or accountable. Louisianans cannot afford more man-made disruptions on top of "natural" disasters in our lives!

Thanks,

Ivy Mathieu

P.O. Box 2491

LaPlace, LA 70069

[ivy\\_mathieu@yahoo.com](mailto:ivy_mathieu@yahoo.com)

197. I am vehemently against merging CPRA with the Dept of Energy and Natural Resources. The eroding coastline doesn't need this political intervention under the guise of efficiency. The haphazard method of merging key agencies without studying the impact is ill advise. There should be clear articulated reasons for this and any other proposed changes going forward.

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Thanks,

Ivy Mathieu

P.O. Box 2491

LaPlace, LA 70069

[ivy\\_mathieu@yahoo.com](mailto:ivy_mathieu@yahoo.com)

198. I've been impressed with the CPRA's recent response to our state's coastal crisis and feel like consolidating CPRA and DENR is going to slow down the momentum that CPRA, and other stakeholders like CRCL, have been working so hard to build. Please consider allowing the CPRA to continue its important work unimpeded by a needless consolidation effort.

Thank you,

Kristian Sonnier, Coalition to Restore Coastal Louisiana (CRCL) board member.

[kssonnier@gmail.com](mailto:kssonnier@gmail.com)

199. Dear Governor Landry and your administration,

I moved back to Louisiana from the East Coast and helped start a business that has hired more than 450 people in the last two years. I joined many non-profit efforts to help restore our working coastline. I value the progress made by the CPRA as a stand alone entity and the coalition support they have earned to insure Louisiana remains a place that will attract the right business owners and citizens to move here.

CPRA must remain an independent agency. The current structure keeps us safe and protects both people and the economy. The current structure keeps politics out of decision-making about what is best for our state's coastal program.

The state's coastal program has created thousands of jobs. For this reason and others, coastal restoration is strongly supported by voters across the state and has earned virtually unanimous support across multiple administrations and Legislatures. This progress helped elect the current administration.

There is a serious risk of unanticipated consequences that could slow down the implementation of critical projects and threaten funding need to build them.

We hope you'll take this need both seriously and swiftly remove the politics from it.

Onward,

J.R.

--

John D. Ross, Jr.

My daily thoughts on Twitter

LinkedIn Profile

203-722-9655

[johnrossjr@gmail.com](mailto:johnrossjr@gmail.com)

200. To whom it may concern,

I submit this comment IN OPPOSITION to executive order JML-13 and more specifically IN OPPOSITION to the consolidation of the Coastal Protection and Restoration Authority with the Department of Energy and Natural Resources and also specifically IN OPPOSITION to the consolidation of the Office of State Lands with the Department of Energy and Natural Resources.

I am a recreational fisherman who owns a boat and fishes in the Rigolets, Hopedale/Shell Beach areas, Golden Meadow, and occasionally Grand Isle.

I am also a surfer who surfs in Grand Isle and on Lake Pontchartrain.

Combining the Coastal Protection and Restoration Authority (CPRA) with the Department of Energy and Natural Resources (DENR) makes no sense and is a terrible policy idea.

The Coastal Protection and Restoration authority does not have the same goals as the Department of Energy and Natural Resources. In fact, they have opposing goals.

The CPRA wants to protect our coast and marshland. The DENR wants to open our coast and marshland to more oil drilling and energy producing activities. How can these offices be combined when they want different things? The DENR is not focused on protecting our coast and marshland. The DENR is just fine with destroying even more of our coast and marshland by opening it up to energy producing activities.

Anyone can see the harm that energy producing activities have done to our coast and marshland. From oil spills to the manmade canals that lead to disappearing marsh.

I am only 33 years old and I have seen the marshes where I fish disappearing.

Protecting our coast and marshland has broad bipartisan support. Opening up our coast and marshland to more energy producing activities does not have broad bipartisan support.

Climate change is real, and it is caused by using fossil fuels for energy. Predicted future sea-level rise is alarming. We need a distinct and separate entity that focuses on protecting our coast and marshland. We need to use less fossil fuels, not more. We don't need more energy producing activities close to our coast. We will have future hurricanes that strike and cause extra damage because of the energy producing activities close to the coast.

We are blessed in Louisiana with beautiful beaches, coastline, and marshes. I would like those things to still be present when my four month old son grows up.

I submit the same comments and reasons above for my opposition to combining the Office of State Land with the DENR.

All of these entities that the governor proposes combining are separate entities for good reason. They should stay that way.

Sincerely,

Colin L. Casciato

[colincasciato@gmail.com](mailto:colincasciato@gmail.com)

201. Dear Governor,

I write to express my opposition to your plan to consolidate agencies under DENR. I have experience as director of another state's Bureau of Public

Lands when it was reorganized, and the effects were disappointing at best. A lot of energy and time was wasted with no real benefit.

CPRA has operated extremely well under the current structure, and I have no doubt that it will be responsive to your office. The momentum that CPRA has generated is impressive. Louisiana's coastal plan is by far the best in the nation. Upsetting this pattern is a dangerous and wrong move. Please listen to those who strongly advise you not to go through with it. Keep CPRA free of the bureaucracy and political influences that are such dangers to a science driven agency that has the most widespread level of public satisfaction among all agencies.

Sincerely,

Robert Gardiner

1030 Webster St, New Orleans, LA 70118



[roberthgardiner@gmail.com](mailto:roberthgardiner@gmail.com)

202. Executive Order JML-13

Please do NOT consolidate the Coastal Protection and Restoration Authority (CPRA) underneath the Louisiana Department of Energy and Natural Resources.

I see no plausible reason that this merger is needed.

I also do not want Gov Landry to reduce the number of board members and advisors at the CPRA. The present board members do NOT receive any form of compensation. They are free, credentialed experts giving valuable input beneficial to the state of Louisiana.

Please do not change the CPRA.

Sincerely,

Jamie Hill, 872 Taft Pl, New Orleans, LA 70119

[jamielhill@gmail.com](mailto:jamielhill@gmail.com)

203. On the proposal to merge departments, it seems that the joining should not be under Energy and Natural Resources. It should be under Coastal Protection and Restoration Authority.

Our coast is and has been under threat from action and inaction of the Energy Department. Energy and Natural Resources have caused marsh erosion as a result of failure to require energy companies to recover canals dug for the explicit use of resource exploration. These canals are a continuing menace to the marsh that Coastal Restoration is trying to combat. Placing Energy over Coastal Restoration is the fox guarding the hen house.

The second impact of Energy is the unencumbered emission of CO2 and methane which are the main culprits in global warming and sea level rise. The latter is a risk to our coastline through marsh inundation. Hot water expands.

By emphasizing Energy as lead for these issues we overlook the golden goose - our "sportsman's paradise" moniker. Without healthy marsh and forests we risk killing the golden goose. It also risks killing our fishing industry through marsh destruction.

Coastal Protection and Restoration needs to lead not follow for the wellbeing of Louisiana.

Earl Pratz

[ehpratz@att.net](mailto:ehpratz@att.net)

204. **Stakeholder Information:**

Full Name: James Dart

Louisiana Resident: Yes

E-Mail Address: news@archdart.com

Organization (if applicable):

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Proposed Consolidation of Coastal Restoration Authority underneath the Dept of Energy and Natural Resources

How has or may it impacted you? Your organization? I am a board member of Cattle Farms Inc/Cattle Farms Management llc, owners of property in lower Plaquemines Parish deeply affected by coastal erosion, sea level rise, etc all caused by fossil fuel- driven climate change.



**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented? I see absolutely no reason for this merger; indeed, the arguments against it are self-evident to anyone aware of the continued, existential threat coastal erosion presents to the entire state, region and nation. Use specific details to support the case.

Reference relevant citations to strengthen your argument. We see no plausible reason that this merger is needed. Furthermore, Gov Landry also seeks to reduce the number of board members and advisors at the CPRA. We have spoken with many of our colleagues who serve on both boards, and none of them has ever received any form of compensation. I fail to see how reducing valuable input from credentialed experts is beneficial to the state of Louisiana—especially if they are not compensated.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? In-Person

205. **Stakeholder Information:**

Full Name: Franklin Beau Davis

Louisiana Resident: No

E-Mail Address: brassworksmusic@gmail.com

Organization (if applicable): Brassworks Music

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Absorbing the Coastal Protection and Restoration Authority into the the Louisiana Department of Energy and Natural Resources and thereby reducing the number of board members and advisors at the CPRA.

How has or may it impacted you? Your organization? Not me or my business, but the citizens of Louisiana

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? No

Does it fall under existing statutes? Regulations? Not to my knowledge

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. I stand with Levees.org in requesting that the CPRA remain independent, with no reduction in the number of board members and advisors.

Did the program your comment concerns change over time? Did it evolve into associated programs? Not to my knowledge

Provide historical context and perspective. The CPRA has provided the services of many volunteer advisors and should still do so under any reorganization. Downsizing it and putting it under other authorities will stifle its effectiveness and negate its mission.

### **Conclusion**

Why should your proposed changes be implemented? I don't see how reducing valuable input from credentialed experts who volunteer their expertise is beneficial to the state of Louisiana.

Use specific details to support the case. See above.

Reference relevant citations to strengthen your argument. See Mark Schleifstein's article here: [https://www.nola.com/news/environment/gov-jeff-landry-wants-changes-to-louisianas-coastal-agency/article\\_23e3d054-c46f-11ee-8638-6b00071c2e97.html](https://www.nola.com/news/environment/gov-jeff-landry-wants-changes-to-louisianas-coastal-agency/article_23e3d054-c46f-11ee-8638-6b00071c2e97.html)

### **Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? No

## 206. **Stakeholder Information:**

Full Name: Matt Hampsey

Louisiana Resident: Yes

E-Mail Address: mhampsey31@gmail.com

Organization (if applicable):

### **Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? The proposed consolidation of the Coastal Protection and Restoration Authority (CPRA) underneath the Louisiana Department of Energy and Natural Resources.

How has or may it impacted you? Your organization? I am worried about a conflict of interest by consolidating the CPRA underneath the LA Dept of Energy and Natural Resources.

### **Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? I am unsure

Does it fall under existing statutes? Regulations? Yes

### **Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. Governor Landry seeks to consolidate the Coastal Protection and Restoration Authority (CPRA) underneath the Louisiana Department of Energy and Natural Resources and I see no plausible reason that this merger is needed. Furthermore, Gov Landry also seeks to reduce the number of board members and advisors at the CPRA. The members who serve on both boards do not receive any form of compensation. I don't see how reducing valuable input from credentialed experts is beneficial to the state of Louisiana—especially if they are not compensated. I am unsure of the law but I do not believe in reducing

Did the program your comment concerns change over time? Did it evolve into associated programs? not sure

Provide historical context and perspective. Current models indicate that LA will lose most of its coast and wetlands in the coming years if we stay on the course we are on. This is not the time to be reducing subject matter experts voice in these matters

### **Conclusion**

Why should your proposed changes be implemented? Our ability to live in south LA depends on this.

Use specific details to support the case. Predicting climate impacts is challenging and has to date relied on indirect methods, notably modeling. Here we examine coastal ecosystem change during 13 years of unusually rapid, albeit likely temporary, sea-level rise ( $> 10 \text{ mm yr}^{-1}$ ) in the Gulf of Mexico. Such rates, which may become a persistent feature in the future due to anthropogenic climate change, drove rising water levels of similar magnitude in Louisiana's coastal wetlands. Measurements of surface-elevation change at 253 monitoring sites show that 87% of these sites are unable to keep up with rising water levels. We find no evidence for enhanced wetland elevation gain through ecogeomorphic feedbacks, where more frequent inundation would lead to enhanced biomass accumulation that could counterbalance rising water levels. We attribute this to the exceptionally rapid sea-level rise during this time period. Under the current climate trajectory (SSP2-4.5), drowning of ~75% of Louisiana's coastal wetlands is a plausible outcome by 2070.

Reference relevant citations to strengthen your argument. A study recently published in the journal Nature Climate Change predicts that millions will move inland in coming years. <https://www.nature.com/articles/s41467-024-45487-6#citeas> Here is the abstract: Predicting climate impacts is challenging and has to date relied on indirect methods, notably modeling. Here we examine coastal ecosystem change during 13 years of unusually rapid, albeit likely temporary, sea-level rise ( $> 10 \text{ mm yr}^{-1}$ ) in the Gulf of Mexico. Such rates, which may become a persistent feature in the future due to anthropogenic climate change, drove rising water levels of similar magnitude in Louisiana's coastal wetlands. Measurements of surface-elevation change at 253 monitoring sites show that 87% of these sites are unable to keep up with rising water levels. We find no evidence for enhanced wetland elevation gain through ecogeomorphic feedbacks, where more frequent inundation would lead to enhanced biomass accumulation that could counterbalance rising water levels. We attribute this to the exceptionally rapid sea-level rise during this time period. Under the current climate trajectory (SSP2-4.5), drowning of ~75% of Louisiana's coastal wetlands is a plausible outcome by 2070.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

207. **Stakeholder Information:**

Full Name: Emily May

Louisiana Resident: Yes

E-Mail Address: emilybmay4@gmail.com

Organization (if applicable): N/A

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? consolidation of the Coastal Protection and Restoration Authority (CPRA) underneath the Louisiana Department of Energy and Natural Resources. We don't see how reducing valuable input from credentialed experts is beneficial to the state of Louisiana—especially if they are not compensated.

How has or may it impacted you? Your organization? CPRA is more accessible as it stands alone. It is clear what they are doing and it is easy to have any questions answered by their personnel.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? No

208. I am opposed to eliminating CPRA as an independent agency. Our land loss crisis is an existential crisis. It impacts our way of life, our culture and all the things we love about our state.

CPRA deserves a prominent position within state government, not buried within a division of a regulatory agency that has a completely different mission.

Thank you,

Peggy Bourg

Harahan LA resident

[Pegbourg83@gmail.com](mailto:Pegbourg83@gmail.com)

209. **Stakeholder Information:**

Full Name: Marchal William

Louisiana Resident: Yes

E-Mail Address: awmarchal@cox.net

Organization (if applicable): St Paul Hunting and Fishing Club

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Combining LADENR and CPRA

How has or may it impacted you? Your organization? This is like letting the fox guard the henhouse

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? Yes. Keep them separate

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual, In-Person

210. **Stakeholder Information:**

Full Name: Alvin DuVernay III

Louisiana Resident: Yes

E-Mail Address: alduvernay@gmail.com

Organization (if applicable): CRCL

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? CPRA & DENR Consolidation

How has or may it impacted you? Your organization? Impede coastal restoration

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented? To whom, I strongly oppose the consolidation of the DENR and CPRA. Including Energy into the Natural Resources Department shall dilute the mission to protect and enhance our environment and natural resources. Further dilution of that mission by including CPRA into that department flies in the face of smart, sustainable stewardship and shall impede our ability to recover and restore our state from generations of natural and man-made destruction. I have lived, worked and played in S La for over seven decades. I'm a geoscientist and an avid outdoorsman so I am intimate with how our state was created and likewise, how and why it is disappearing. CPRA was created after Katrina to explicitly and with laser focus address the overwhelming challenges of protection and restoration. They have delivered multiple SMART plans based on science and empirical data. They have delivered many effective projects with like minded organizations through coordination and coalition. Projects that demonstrably keep us safe from storms and

protect our people, landscape and economy. Nay, they enhance the economy. They were able to do so precisely because of their focus and ability to operate independent of conflicting missions and/or agendas and most importantly politics. I've never been more impressed with any government agency. Any! Our disappearing coast is beyond critical due to a century of neglect, special interests and inaction. Consolidation WILL slow down the implementation of critical projects and threaten funding needed to build them. If you think this is not so, you haven't been paying attention. Please do not allow this consolidation to happen. We are desperate to fix our broken coast and CPRA, as is, has verifiably demonstrated that they have the tools to do it. By the way, what's the rush? Take a breath. Think this through. How do you see this improving efficiencies and synergies? Give us citizens information on your thinking. On your motivation. And most importantly, give us time to react to the plan and let our wishes be known. Alvin E DuVernay III 6533 General Haig NO, La alduvernay@gmail.com 504 813-1324

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

#### **Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? In-Person

211. To whom,

I strongly oppose the consolidation of the DENR and CPRA. Including Energy into the Natural Resources Department shall dilute the mission to protect and enhance our environment and natural resources. Further dilution of that mission by including CPRA into that department flies in the face of smart, sustainable stewardship and shall impede our ability to recover and restore our state from generations of natural and man-made destruction.

I have lived, worked and played in S La for over seven decades. I'm a geoscientist and an avid outdoorsman so I am intimate with how our state was created and likewise, how and why it is disappearing.

CPRA was created after Katrina to explicitly and with laser focus address the overwhelming challenges of protection and restoration. They have delivered multiple SMART plans based on science and empirical data. They have delivered many effective projects with like minded organizations through coordination and coalition. Projects that demonstrably keep us safe from storms and protect our people, landscape and economy. Nay, they enhance the economy. They were able to do so precisely because of their focus and ability to operate independent of conflicting missions and/or agendas and most importantly politics. I've never been more impressed with any government agency. Any!

Our disappearing coast is beyond critical due to a century of neglect, special interests and inaction. Consolidation WILL slow down the implementation of critical projects and threaten funding needed to build them. If you think this is not so, you haven't been paying attention. Please do not allow this consolidation to happen. We are desperate to fix our broken coast and CPRA, as is, has verifiably demonstrated that they have the tools to do it.

By the way, what's the rush? Take a breath. Think this through. How do you see this improving efficiencies and synergies? Give us citizens information on your thinking. On your motivation. And most importantly, give us time to react to the plan and let our wishes be known.

Alvin E DuVernay III

6533 General Haig  
NO, La  
alduvernay@gmail.com  
504 813-1324

212. **Stakeholder Information:**

Full Name: Laura Paul

Louisiana Resident: Yes

E-Mail Address: laura@lowernine.org

Organization (if applicable): lowernine.org

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? consolidation of the Coastal Protection and Restoration Authority (CPRA) underneath the Louisiana Department of Energy and Natural Resources

How has or may it impacted you? Your organization? Don't see how reducing valuable input from credentialed experts is beneficial to the state of Louisiana—especially if they are not compensated.

**Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? No

Does it fall under existing statutes? Regulations? No

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

213. Dear Governor Landry and Secretary Gray,

Attached please find a letter from the Bureau of Governmental Research commenting on Executive Order JML-24-13, specifically the inclusion of the Coastal Protection and Restoration Authority and the CPRA Board in the proposed consolidation and reorganization of certain state entities into the Department of Energy and Natural Resources. Please include our letter in the public comments on this proposal.

We appreciate the chance to share our thoughts, and thank you for your consideration.

Sincerely,

Stephen

Stephen Stuart

Vice President & Research Director  
Bureau of Governmental Research  
1055 St. Charles Avenue, Suite 200  
New Orleans, LA 70130  
(504) 525-1668  
<https://www.bgr.org/>  
[sstuart@bgr.org](mailto:sstuart@bgr.org)





VIA EMAIL TO [DRIVEINITIATIVE@LA.GOV](mailto:DRIVEINITIATIVE@LA.GOV) AND [TYLER.GRAY@LA.GOV](mailto:TYLER.GRAY@LA.GOV)

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February 20, 2024

The Hon. Jeff Landry  
Governor  
State of Louisiana  
Office of the Governor  
P.O. Box 94004  
Baton Rouge, LA 70804

Mr. Tyler Gray  
Secretary  
Louisiana Department of Energy and Natural Resources  
Office of the Secretary  
P.O. Box 94396  
Baton Rouge, LA 70804

Re: Comment on Executive Order JML 24-13

Dear Governor Landry and Secretary Gray:

The Bureau of Governmental Research (BGR) is a private, nonprofit, independent public policy research organization based in New Orleans. We are writing to comment on the governor's proposal to consolidate and reorganize the Coastal Protection and Restoration Authority (CPRA) and the CPRA Board under the Louisiana Department of Energy and Natural Resources (the Department).

In September 2006, Louisiana voters took a new approach to hurricane protection and coastal restoration. The centerpiece was the CPRA, [which BGR supported](#). The CPRA raised the profile of coastal protection as a vital issue for Louisiana. It brought together functions of multiple state departments to centralize accountability. And it became responsible for coastal policy and comprehensive planning to use the public's resources effectively. Creating the CPRA was a pivotal move for Louisiana to secure federal government funding to rebuild from hurricanes Katrina and Rita in 2005.

Nearly two decades later, residents and businesses can see the benefits of having a stand-alone agency dedicated solely to restoring and protecting the coast. They enjoy much better protection from hurricane storm surge than ever before. Two years ago, the CPRA assumed control of the \$15 billion hurricane protection system for southeast Louisiana from the U.S. Army Corps of Engineers. The CPRA has taken on the critical responsibility to operate and maintain the system in coordination with local

governments and levee authorities. The CPRA has also advanced a wide range of projects to rebuild natural wetlands to buffer future storm surges.

The public has [few details](#) on the proposed consolidation and reorganization. The Department could absorb the CPRA and its governing board. It also could absorb other state agencies, boards and commissions that deal with natural resources and energy. The governor's [executive order](#) and [memorandum](#) call for the Department's initial report by February 23. The memo states this is only a first step in the administration's review, not a final decision. The stated goal is to optimize, rather than eliminate, the essential functions of the entities involved.

The governor's memo offers only general reasons for this new approach. It states that "the current separation of related coastal, energy, emergency response, and state lands functions into distinct silos creates inherent inefficiencies, limits solutions and communications, and compromises effectiveness resulting in a waste of time, effort, and resources of tax dollars." The effort seeks a "more cohesive organizational structure."

State agencies, boards and commissions tend to pile up over many years. The executive order lists more than a dozen besides the CPRA. Any new governor should evaluate their necessity and seek efficiencies to save taxpayer money. But there are valid reasons to keep the CPRA and its board separate from the Department:

- **The work of the CPRA and its board is distinct from the Department's mission.** Protecting Louisiana's coast is a multi-agency effort. It goes well beyond the Department's mission of promoting sustainable and responsible use of Louisiana's natural resources. The membership of the [CPRA's board](#) reflects many interests in the coast's future and incorporates a broad range of perspectives into coastal policy making. First, the governor is closely involved. The executive assistant to the governor for coastal activities chairs the CPRA board. And, with input from levee boards and local governments, the governor appoints eight citizens from across south Louisiana. The Department's secretary is one of many state officials with a seat on the board. These officials all have relevant roles for the coast, including transportation, wildlife and fisheries, environmental quality, economic development, agriculture and forestry, insurance, and disaster preparedness and emergency response. This is far from operating in a silo. Consolidating the CPRA into Energy and Natural Resources could weaken this holistic approach. Even if the CPRA board remains, the Department's greater control could blur lines of responsibility for other board members.
- **The CPRA and its board provide public transparency and accountability.** The CPRA and its board act as the unified voice of coastal protection and restoration, which involves many communities and their local governments. They can participate in public CPRA meetings and planning sessions. And they can access the master plan, progress reports, interactive maps, educational videos and more on the CPRA's website, [coastal.la.gov](http://coastal.la.gov). They know the CPRA and its board are responsible, even if they may disagree with a policy decision. Placing the CPRA and its board within the Department could create confusion and reduce accessibility. It would be less clear whether the board or the Department is in charge. This could diminish public trust in the long-term restoration effort. Consolidation

into the Department also could reduce much-needed public visibility for the multi-decade coastal protection and restoration effort.

- **The CPRA and its board can help make the case for future federal funding for the coast.** Merging the CPRA into the Department would be a complex, multi-year task. It would require much attention to legislation, governance and operations. This may cost the state time and momentum to secure new federal funding. The [Public Affairs Research Council of Louisiana has reported](#) that coastal funding will reach a “fiscal cliff” in about eight years. At that time, the state will run out of money from the Deepwater Horizon oil spill settlement. Funding, not the CPRA’s current structure and governance, is the major issue in coastal restoration and protection. The governor must keep that financial horizon in view. A distinct and independent CPRA can help make Louisiana’s case by keeping up the pace of coastal restoration projects.

Thank you for considering our comments.

Sincerely,



Rebecca Mowbray

President and CEO

*Samuel Zemurray Chair in Research Leadership*

Bureau of Governmental Research

214. **Stakeholder Information:**

Full Name: Rodney Omar Casimire

Louisiana Resident: Yes

E-Mail Address: katrinanationalmuseum@gmail.com

Organization (if applicable): Katrina National Memorial Park Charitable Foundati

**Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Merging two agencies that are responsible for addressing climate change and its effects on Louisiana's wetlands could be seen as a bad idea for several reasons: Specialization and Focus: Each agency might have specialized knowledge and expertise in their respective areas. Merging them could dilute this expertise and lead to a loss of focus on specific issues, such as the unique challenges facing Louisiana's wetlands. Resource Allocation: Combining agencies might lead to a reallocation of resources that could disadvantage efforts to combat climate change or protect the wetlands. There might be competition for funding and attention within the merged entity. Bureaucratic Challenges: Mergers can lead to increased bureaucracy, which might slow down decision-making and implementation of critical initiatives. In the face of urgent issues like climate change and wetland degradation, this could be detrimental. Stakeholder Engagement: Different agencies might have established relationships with specific stakeholders, such as environmental groups, local communities, or industry partners. Merging agencies could disrupt these relationships and hinder collaborative efforts. Policy Alignment: If the missions or approaches of the two agencies are not closely aligned, merging them could lead to conflicts in policy direction and priorities. In the context of Louisiana's wetlands, which are facing significant threats from climate change, such as rising sea levels, increased storm intensity, and coastal erosion, it is crucial to have dedicated, focused efforts to address these challenges effectively. Merging agencies might compromise the ability to respond swiftly and effectively to the specific needs of this critical ecosystem.

How has or may it impacted you? Your organization? Merging two agencies that are responsible for addressing climate change and its effects on Louisiana's wetlands could be seen as a bad idea for several reasons: Specialization and Focus: Each agency might have specialized knowledge and expertise in their respective areas. Merging them could dilute this expertise and lead to a loss of focus on specific issues, such as the unique challenges facing Louisiana's wetlands. Resource Allocation: Combining agencies might lead to a reallocation of resources that could disadvantage efforts to combat climate change or protect the wetlands. There might be competition for funding and attention within the merged entity. Bureaucratic Challenges: Mergers can lead to increased bureaucracy, which might slow down decision-making and implementation of critical initiatives. In the face of urgent issues like climate change and wetland degradation, this could be detrimental. Stakeholder Engagement: Different agencies might have established relationships with specific stakeholders, such as environmental groups, local communities, or industry partners. Merging agencies could disrupt these relationships and hinder collaborative efforts. Policy Alignment: If the missions or approaches of the two agencies are not closely aligned, merging them could lead to

conflicts in policy direction and priorities. In the context of Louisiana's wetlands, which are facing significant threats from climate change, such as rising sea levels, increased storm intensity, and coastal erosion, it is crucial to have dedicated, focused efforts to address these challenges effectively. Merging agencies might compromise the ability to respond swiftly and effectively to the specific needs of this critical ecosystem.

### **Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution? Merging two agencies that are responsible for addressing climate change and its effects on Louisiana's wetlands could be seen as a bad idea for several reasons: Specialization and Focus: Each agency might have specialized knowledge and expertise in their respective areas. Merging them could dilute this expertise and lead to a loss of focus on specific issues, such as the unique challenges facing Louisiana's wetlands. Resource Allocation: Combining agencies might lead to a reallocation of resources that could disadvantage efforts to combat climate change or protect the wetlands. There might be competition for funding and attention within the merged entity. Bureaucratic Challenges: Mergers can lead to increased bureaucracy, which might slow down decision-making and implementation of critical initiatives. In the face of urgent issues like climate change and wetland degradation, this could be detrimental. Stakeholder Engagement: Different agencies might have established relationships with specific stakeholders, such as environmental groups, local communities, or industry partners. Merging agencies could disrupt these relationships and hinder collaborative efforts. Policy Alignment: If the missions or approaches of the two agencies are not closely aligned, merging them could lead to conflicts in policy direction and priorities. In the context of Louisiana's wetlands, which are facing significant threats from climate change, such as rising sea levels, increased storm intensity, and coastal erosion, it is crucial to have dedicated, focused efforts to address these challenges effectively. Merging agencies might compromise the ability to respond swiftly and effectively to the specific needs of this critical ecosystem.

Does it fall under existing statutes? Regulations? Merging two agencies that are responsible for addressing climate change and its effects on Louisiana's wetlands could be seen as a bad idea for several reasons: Specialization and Focus: Each agency might have specialized knowledge and expertise in their respective areas. Merging them could dilute this expertise and lead to a loss of focus on specific issues, such as the unique challenges facing Louisiana's wetlands. Resource Allocation: Combining agencies might lead to a reallocation of resources that could disadvantage efforts to combat climate change or protect the wetlands. There might be competition for funding and attention within the merged entity. Bureaucratic Challenges: Mergers can lead to increased bureaucracy, which might slow down decision-making and implementation of critical initiatives. In the face of urgent issues like climate change and wetland degradation, this could be detrimental. Stakeholder Engagement: Different agencies might have established relationships with specific stakeholders, such as environmental groups, local communities, or industry partners. Merging agencies could disrupt these relationships and hinder collaborative efforts. Policy Alignment: If the missions or approaches of the two agencies are not closely aligned, merging them could lead to conflicts in policy direction and priorities. In the context of Louisiana's wetlands, which are facing significant threats from climate change, such as rising sea levels, increased storm intensity, and coastal erosion, it is crucial to have dedicated, focused efforts to address these

challenges effectively. Merging agencies might compromise the ability to respond swiftly and effectively to the specific needs of this critical ecosystem.

### **Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc. Merging two agencies that are responsible for addressing climate change and its effects on Louisiana's wetlands could be seen as a bad idea for several reasons: Specialization and Focus: Each agency might have specialized knowledge and expertise in their respective areas. Merging them could dilute this expertise and lead to a loss of focus on specific issues, such as the unique challenges facing Louisiana's wetlands. Resource Allocation: Combining agencies might lead to a reallocation of resources that could disadvantage efforts to combat climate change or protect the wetlands. There might be competition for funding and attention within the merged entity. Bureaucratic Challenges: Mergers can lead to increased bureaucracy, which might slow down decision-making and implementation of critical initiatives. In the face of urgent issues like climate change and wetland degradation, this could be detrimental. Stakeholder Engagement: Different agencies might have established relationships with specific stakeholders, such as environmental groups, local communities, or industry partners. Merging agencies could disrupt these relationships and hinder collaborative efforts. Policy Alignment: If the missions or approaches of the two agencies are not closely aligned, merging them could lead to conflicts in policy direction and priorities. In the context of Louisiana's wetlands, which are facing significant threats from climate change, such as rising sea levels, increased storm intensity, and coastal erosion, it is crucial to have dedicated, focused efforts to address these challenges effectively. Merging agencies might compromise the ability to respond swiftly and effectively to the specific needs of this critical ecosystem.

Did the program your comment concerns change over time? Did it evolve into associated programs? Yes

Provide historical context and perspective. Merging two agencies that are responsible for addressing climate change and its effects on Louisiana's wetlands could be seen as a bad idea for several reasons: Specialization and Focus: Each agency might have specialized knowledge and expertise in their respective areas. Merging them could dilute this expertise and lead to a loss of focus on specific issues, such as the unique challenges facing Louisiana's wetlands. Resource Allocation: Combining agencies might lead to a reallocation of resources that could disadvantage efforts to combat climate change or protect the wetlands. There might be competition for funding and attention within the merged entity. Bureaucratic Challenges: Mergers can lead to increased bureaucracy, which might slow down decision-making and implementation of critical initiatives. In the face of urgent issues like climate change and wetland degradation, this could be detrimental. Stakeholder Engagement: Different agencies might have established relationships with specific stakeholders, such as environmental groups, local communities, or industry partners. Merging agencies could disrupt these relationships and hinder collaborative efforts. Policy Alignment: If the missions or approaches of the two agencies are not closely aligned, merging them could lead to conflicts in policy direction and priorities. In the context of Louisiana's wetlands, which are facing significant threats from climate change, such as rising sea levels, increased storm intensity, and coastal erosion, it is crucial to have dedicated, focused efforts to address these challenges effectively.

Merging agencies might compromise the ability to respond swiftly and effectively to the specific needs of this critical ecosystem.

### **Conclusion**

Why should your proposed changes be implemented? Don't move ahead with the merger.

Use specific details to support the case. Merging two agencies that are responsible for addressing climate change and its effects on Louisiana's wetlands could be seen as a bad idea for several reasons: Specialization and Focus: Each agency might have specialized knowledge and expertise in their respective areas. Merging them could dilute this expertise and lead to a loss of focus on specific issues, such as the unique challenges facing Louisiana's wetlands. Resource Allocation: Combining agencies might lead to a reallocation of resources that could disadvantage efforts to combat climate change or protect the wetlands. There might be competition for funding and attention within the merged entity. Bureaucratic Challenges: Mergers can lead to increased bureaucracy, which might slow down decision-making and implementation of critical initiatives. In the face of urgent issues like climate change and wetland degradation, this could be detrimental. Stakeholder Engagement: Different agencies might have established relationships with specific stakeholders, such as environmental groups, local communities, or industry partners. Merging agencies could disrupt these relationships and hinder collaborative efforts. Policy Alignment: If the missions or approaches of the two agencies are not closely aligned, merging them could lead to conflicts in policy direction and priorities. In the context of Louisiana's wetlands, which are facing significant threats from climate change, such as rising sea levels, increased storm intensity, and coastal erosion, it is crucial to have dedicated, focused efforts to address these challenges effectively. Merging agencies might compromise the ability to respond swiftly and effectively to the specific needs of this critical ecosystem.

Reference relevant citations to strengthen your argument.

### **Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)? Virtual

#### 215. **Stakeholder Information:**

Full Name: Philip Cherry

Louisiana Resident: Yes

E-Mail Address: pacherry@earthlink.net

Organization (if applicable):

#### **Make a Case for Change:**

Identify the Issue

What is the specific issue you are addressing? Burying the Coastal Protection and Restoration Authority under Department of Energy and Natural Resources

How has or may it impacted you? Your organization? Placing responsibility for restoring Louisiana's shrinking coastline under an agency long captured by the industry that caused most of the damage.

#### **Legal Framework**

Is the issue a legal one? If so, is it addressed in the constitution?

Does it fall under existing statutes? Regulations?

**Historical Analysis**

Include as much history of the relevant issue, rule or law using specific dates, relevant references, citations, etc.

Did the program your comment concerns change over time? Did it evolve into associated programs?

Provide historical context and perspective.

**Conclusion**

Why should your proposed changes be implemented?

Use specific details to support the case.

Reference relevant citations to strengthen your argument.

**Public Meetings Attendance**

Would you be interested in attending stakeholder meeting(s)?      No

216. I understand the governor seeks to consolidate the CRCL with the Dept of Energy. This is ill-advised. The coast is in crisis and needs specific and special attention and resources. This isn't a political issue. Without a resilient coast, the state's economic future is made more dire, and entire industries will be at risk, not to mention lives, communities, and culture. Keep the CRCL independent and politics out of the state's coastal plan.

Thanks,

Brent

[brent@shady.la](mailto:brent@shady.la)