



2023 COASTAL MASTER PLAN

# PUBLIC COMMENTS

SUPPLEMENTAL MATERIAL A.2

REPORT: VERSION 02

DATE: APRIL 2023

PREPARED BY: CPRA



COASTAL PROTECTION AND  
RESTORATION AUTHORITY  
150 TERRACE AVENUE  
BATON ROUGE, LA 70802  
[WWW.COASTAL.LA.GOV](http://WWW.COASTAL.LA.GOV)

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## CITATION

Coastal Protection and Restoration Authority of Louisiana. (2023). 2023 Coastal Master Plan: Supplemental Material A.2: Public Comments. Version 2. (p. 370). Baton Rouge, Louisiana: Coastal Protection and Restoration Authority.

# OVERVIEW

Following the completion of the 2023 Draft Coastal Master Plan, CPRA sought insight from various stakeholders through an official public comment period that began January 6<sup>th</sup>, 2023 and concluded on March 25<sup>th</sup>, 2023.

Over the course of the public comment period, CPRA received a total of 209 public comments from stakeholders. All of the submissions were aggregated and reviewed by CPRA's team and were considered during the creation of the final 2023 Coastal Master Plan. The following attachment is a compilation of all submissions.

## CPRA Master Plan

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**From:** CPRA Website <cpra@info.la.gov>  
**Sent:** Wednesday, January 11, 2023 1:00 PM  
**To:** Master Plan  
**Subject:** New submission from Contact Us

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

### Name

Ron Spencer

### Phone

### Email

### Message

Hello,  
The Joe W. and Dorothy Dorsett Brown Foundation funded the development of a consortium with the Water Institute of the Gulf, Bywater, Lumcon, the Salk Institute, and the Pontchartrain Basin Foundation, in order to evaluate approaches to the restoration of coastal plant species. The value of Typha species, particularly as regards to the plant's capacity to sequester massive amounts of carbon via suberin in its root system, was particularly noted.  
It would be very helpful to the Brown Foundation and members of the consortium to know if this effort was of any value in the development of the 2023 iteration of the master plan. Thank you for your efforts in the project.  
R.P. Spencer, M.D.

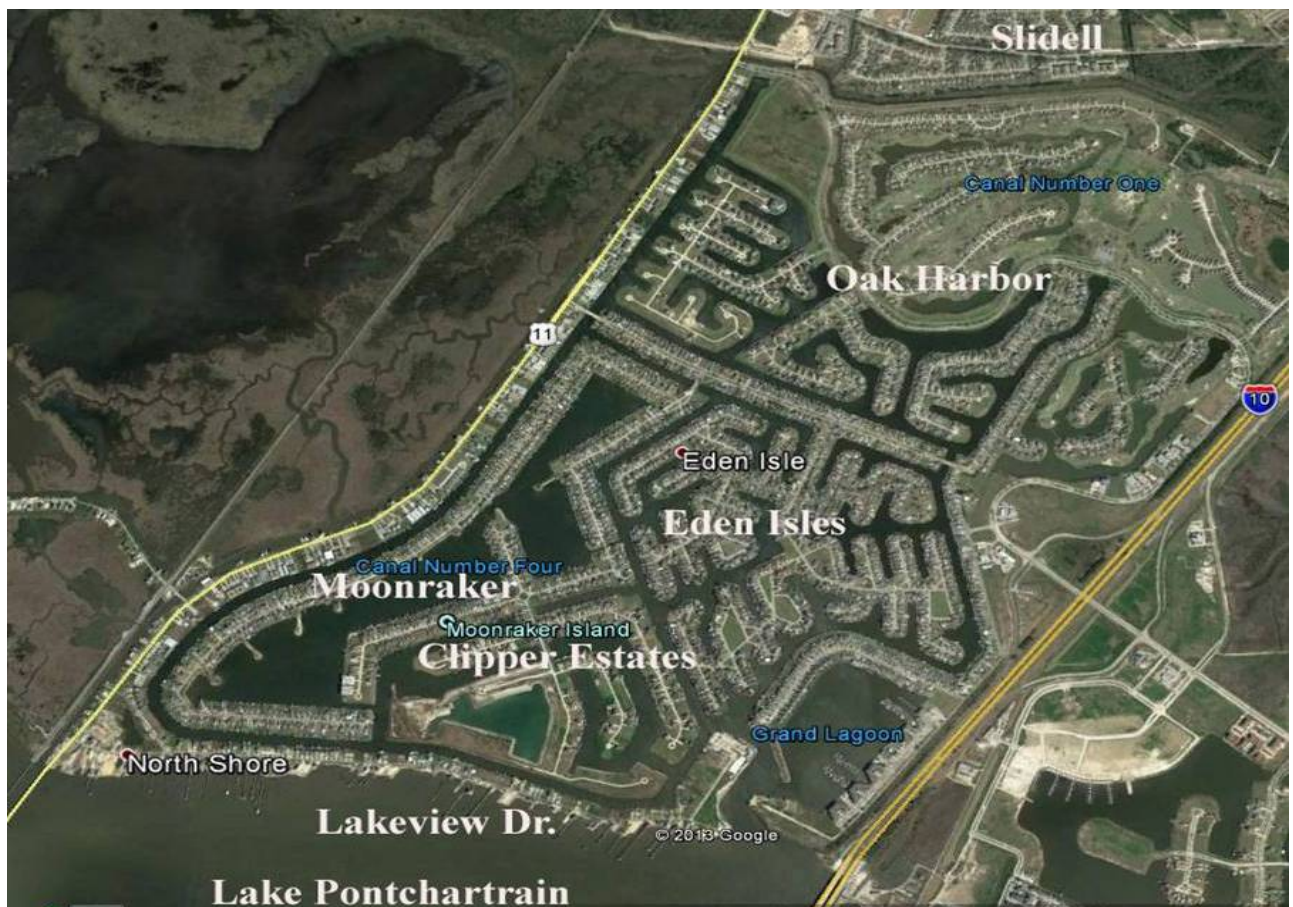
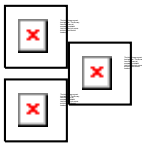


## CPRA Master Plan

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**From:** Thomas Thompson  
**Sent:** Friday, January 13, 2023 8:09 AM  
**To:** Master Plan  
**Cc:** Chip Kline; Brent.Haase@la.gov; Skrieger.stldcd@aol.com; shewitt@legis.la.gov; Hse090@legis.la.gov; Robyn@mail.house.gov; mcooper@stpgov.org; Jake.airey@stpgov.org; rbpausina@stpgov.org;  
Comments to the 2023 DRAFT Coastal Master Plan for documentation  
  
**Subject:**

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.



I respectfully request the CPRA honor their commitment to Eden Isles and “unequivocally” include the Eden Isles structural protection plan in the state’s coastal master plan.

Only one sentence in the draft 2023 master plan on pages 153, addresses protection for Eden Isles and, it simply says:

*“USACE’s TSP included a significant nonstructural component. As this project progresses, CPRA, USACE, and St. Tammany Parish will look for opportunities to further reduce risk for communities like Eden Isles that sit outside of the current structural protection alignment.”*

**“To look for opportunities” IS NOT A COMMITMENT** to the communities at the highest risk from surge-based flooding in coastal Louisiana.

**A true commitment statement would read as follows:**

CPRA structural projects shall be implemented to supplement the USACE’s TSP plan in order to extend structural protection to the state’s highest risk communities like Eden Isles that sit outside of the current structural protection alignment.

In addition, the Eden Isles structural protection project needs to be included in the list of Master Plan structural risk reduction projects.

ID#	Project Name	Description	IP	Cost \$
TBD	Eden Isles structural protection Project	Provide structural protection to the community south of Slidell, north of Lake Pontchartrain, east of Highway 11, and west of Interstate 10. The project will feature a gate and pump station at the mouth of the Oak Harbor Marina in addition to additional surge reduction structures.	?	100M

The CPRA must honor their commitment to unequivocally include the Eden Isles’ structural protection plan into the 2023 master plan\*.

\* CPRA leadership commitments made:

**2021-07-08**, State Senator Sharon Hewitt, CPRA Chairman Chip Kline, President St. Tammany Parish Mike Cooper, Chairman St. Tammany Levee District Suzanne Krieger, along with local, parish and state officials met in support of the USACE St. Tammany flood protection Feasibility Study. In addition, the group agreed to supplement the USACE plan with the CPRA, STPG, STLDCD protection plan for Eden Isles to provide a resilience project for Eden Isles through evaluation of the following:

- Resilience and Elevation of Roadway Corridors, raising and flood-proofing of the roadway corridor around Eden Isles (I-10, Highway 11, and Lakeview Drive)
- Floodgate & Pump Station Complex, potential floodgate and pump station complex at Eden Isles Grand Lagoon

Implementation of the project can be conducted through the following items

- STPG and STLDCD will begin evaluating the roadway improvements using the existing funding through the St. Tammany Parish Coastal Study
- STPG and STLDCD will work to secure funding for the project through the Louisiana Watershed Initiative or other sources
- CPRA will work to include the Eden Isle Resilience Project in the State’s 2023 Coastal Master Plan and will utilize existing funding to evaluate the design and benefits of a floodgate/pump station complex at Eden Isles
- St. Tammany Parish Northshore Delegation will continue to work to appropriate funding as needed through Capital Outlay or other sources

- **2021-08-13**, Meeting held by Congressman Steve Scalise and State Senator Sharon Hewitt. Others in attendance were: CPRA Chairman Chip Kline, CPRA Operations Chief Ignacio Harrouch, President St. Tammany Parish Mike Cooper, Chairman St. Tammany Levee District Suzanne Krieger, Vice-Chairman St. Tammany Levee District John Faust, Councilman St. Tammany Parish Jake Airey. All in attendance agreed that the St. Tammany Levee Board/St. Tammany Parish Government's preferred plan for communities like Eden Isles that sit outside of the current structural protection alignment be funded and included in the 2023 state master plan

- **2022-03-15**, Meeting with Governor Edwards, where the CPRA committed to including protection plans for Eden Isles, Military Road and Highway 433 areas in the 2023 master plan. The meeting was attended by: CPRA Chairman Chip Kline, Director of Intergovernmental Affairs Russell Caffery, President St. Tammany Parish Mike Cooper, Chairman St. Tammany Levee District Suzanne Krieger, Vice President Neel-Schaffer, Inc. Glenn Ledet

**2022-10-19**, Monthly CPRA meeting held in St. Bernard Parish, the CPRA Chairman committed to include the Eden Isles structural protection plan in the 2023 master plan once he received a formal request from State Senator Sharon Hewitt, President of the St. Tammany Parish Michael Cooper, and Chairman of the St. Tammany Parish Levee District Suzanne Kreiger

**2022-11-04**, The formal request from State Senator Sharon Hewitt, President of the St. Tammany Parish Michael Cooper, and Chairman of the St. Tammany Parish Levee District Suzanne Kreiger, was sent in accordance with the CPRA Chairman's "FINAL" requirement needed to include flood risk reduction projects for South Slidell, Eden Isles, Highway 433 and Military Road into the 2023 master plan

**2022-11-16**, Monthly CPRA meeting held in St. Tammany Parish, the CPRA Chairman committed to include an Eden Isles structural protection plan in its 2023 master plan

**2022-11-16**, CPRA public 2023 master plan meeting held in Lacombe, Bren Haase, CPRA Executive Director committed to include an Eden Isles structural protection plan in its 2023 master plan

Sincerely,

Tom Thompson

## CPRA Master Plan

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**From:** Thomas Thompson  
**Sent:** Friday, January 13, 2023 11:22 AM  
**To:** Master Plan  
**Subject:** Comments to the 2023 DRAFT Coastal Master Plan for documentation  
**Attachments:** 2023-01-13 Comment Letter to the 2023 DRAFT Coastal Master Plan.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

PDF of comments

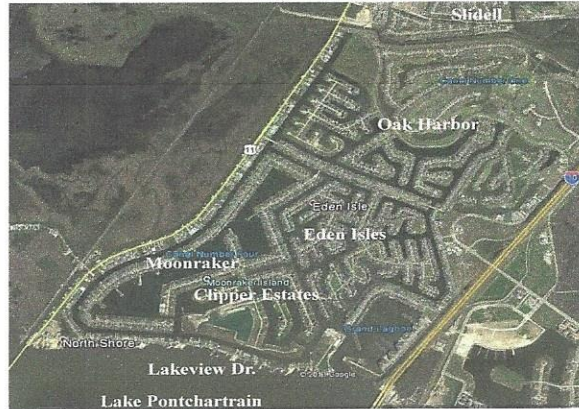
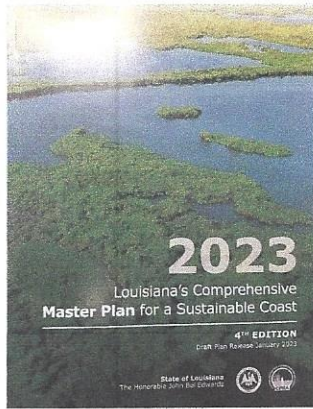
On Friday, January 13, 2023 at 08:09:49 AM CST, Master Plan <masterplan@la.gov> wrote:

Thank you for your email and your interest in the 2023 Coastal Master Plan. As needed, someone from our team will follow up with you as soon as possible.

Thanks again for your interest in protecting and restoring our coast,  
The Master Plan Team



**Public Comment**  
to the proposed  
**CPRA 2023 DRAFT Coastal Master Plan**  
Submitted on January 13, 2023



I respectfully request the CPRA honor their commitment to Edén Isles and “unequivocally” include the Edén Isles structural protection plan in the state’s coastal master plan.

Only one sentence in the draft 2023 master plan on pages 153, addresses protection for Edén Isles and, it simply says:

*“USACE’s TSP included a significant nonstructural component. As this project progresses, CPRA, USACE, and St. Tammany Parish will look for opportunities to further reduce risk for communities like Edén Isles that sit outside of the current structural protection alignment.”*

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**A true commitment statement would read as follows:**

CPRA structural projects shall be implemented to supplement the USACE’s TSP plan in order to extend structural protection to the state’s highest risk communities like Edén Isles that sit outside of the current structural protection alignment.

In addition, the Edén Isles structural protection project needs to be included in the list of Master Plan structural risk reduction projects.

ID#	Project Name	Description	IP	Cost \$
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The CPRA must honor their commitment to unequivocally include the Eden Isles' structural protection plan into the 2023 master plan\*.

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- St. Tammany Parish Northshore Delegation will continue to work to appropriate funding as needed through Capital Outlay or other sources

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Sincerely,

A handwritten signature in cursive script that reads "Thompson". The signature is written in dark ink and is positioned below the word "Sincerely,".

Tom Thompson  
217 Windward Passage  
Eden Isles, La. 70458  
[ThomasThompson@Yahoo.com](mailto:ThomasThompson@Yahoo.com)  
985-285-1768

## CPRA Master Plan

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**From:** Mark L. McNamara  
**Sent:** Tuesday, January 17, 2023 2:20 PM  
**To:** Master Plan  
**Cc:** Debra Leard; Hayley Landry  
**Subject:** 2023 Master Plan

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hi. Thank you for your efforts regarding the Louisiana coastal master plan. I am following up on the master plan 101 webinar invitation for questions. This probably already exists, but I have not seen it. Is there a list anywhere of projects proposed in the 2017 master plan that are not carried forward in the 2023 plan? Furthermore, is there a central document one could look to that explains why some of these projects were deemphasized?

Many thanks  
Mark McNamara.

Sent from my iPhone



## CPRA Master Plan

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**From:** Nathaniel Goetz  
**Sent:** Thursday, January 19, 2023 2:06 PM  
**To:** Master Plan  
**Subject:** 2023 DRAFT Coastal Master Plan Inquiry

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

To whom it may concern at the CPRA,

My name is Nathaniel, I'm a recent Columbia University grad in Environmental Engineering with a current research focus in ecohydrology and coastal wetlands. I reviewed your 2023 Master Plan and have a few questions. Please let me know your thoughts as soon as possible, and if there is anything else I can do to help.

First for the Marsh Creation projects, are there any plans to minimize sediment dredging impacts, particularly habitat disturbance along coastal bottom waters? Do you know if sediment will be harvested from "Borrow Sources" in or around known oyster reefs areas offshore? I noticed that Oyster Reef Restoration is one of the listed project types, however it seems there is little relevant information provided. It also appears from the 50-year project timeline map that there are no oyster reef restoration projects planned throughout the southern LA coast, is this correct? Is it safe to assume that deepening the Gulf for sediment dredging is counter-productive for diffusing wave energy in the region, thus likely increasing demand for preserving and/or restoring these "ocean" floor habitats? Lastly, are the earth containment dikes designed to restrict tidal flows from entering and exiting the new coastal wetlands? If so, what will be the extent of tidal restriction? Will dikes be accompanied by an inlet/outlet structure to support aquatic passability and ensure proper salinity levels that prevent the spread of invasive salt-intolerant marsh?

For the Sediment Diversions, will the designed intake structures ensure optimal sediment transport that prevents accumulation at the hydrologic barriers, i.e. the flood gates or intake armoring? How will these structures impact regional aquatic passability, and are there plans to fund relevant monitoring or surveying efforts post-construction?

Thank you for your time and consideration. I look forward to receiving a thorough response to the above questions and comments.

Best regards,  
Nathaniel

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Nathaniel Goetz (he/him)  
MS Student | Earth and Environmental Engineering  
Columbia University, New York, NY

## CPRA Master Plan

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**From:** CPRA Website <cpra@info.la.gov>  
**Sent:** Friday, January 20, 2023 5:23 PM  
**To:** Master Plan  
**Subject:** New submission from Contact Us

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Name
Anandi Premllall
Phone
Email
Message
Are you considering installing myco-filtration barriers along the coast and along areas that lead to water bodies to protect them from being contaminated and to preserve the wildlife and ecology of our water systems?

## CPRA Master Plan

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**From:** CPRA Website <cpra@info.la.gov>  
**Sent:** Sunday, January 22, 2023 9:10 AM  
**To:** Master Plan  
**Subject:** New submission from Contact Us

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

### Name

Michele Long

### Phone

### Email

### Message

Thank you for including the Cameron Gulf Shoreline Restoration project in the FY2024 plan. As written the estimated cost will be \$8 million with the funding source coming from the state. My question is will the state be providing the full \$8 million to begin the project in mid-2023?

Again, thank you for working with us in Southwest Louisiana. This project will go a long way to better harden the coastline which in turn will help protect the marshes and points north.

Respectfully,  
Michele Long  
Cameron Parish Beachfront Development District #1

## CPRA Master Plan

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**From:** CPRA Website <cpra@info.la.gov>  
**Sent:** Monday, January 30, 2023 11:33 AM  
**To:** Master Plan  
**Subject:** New submission from Contact Us

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

### Name

Andrew Kazal

### Phone

### Email

### Message

Hello,

Hope all is well with you! I have been skimming through the 2023 master plan update and noticed that while there are plenty of general, high-level comparisons to the 2017 master plan, there is no explicit explanation of difference of acreage, etc. Perhaps I missed it, but could you comment on or direct me to a more explicit description of the differences between the 2017 and 2023 master plans? For example, choosing more of a 1-1 comparison, under a high environmental scenario at year 50 of the modeling with plan, what is the difference in land gained/maintained/lost between 2017 and 2023? Are there significant differences in the future landscape under a high environmental scenario between 2017 and 2023?

Thank you in advance for your help!

All the best,  
Andrew

## CPRA Master Plan

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**From:** Kazal, Andrew  
**Sent:** Monday, January 30, 2023 12:33 PM  
**To:** Master Plan  
**Subject:** 2017 vs 2023 master plan viewer

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Hello!

I would like to suggest that the master plan data viewer that has been drafted for the 2023 master plan also include some sort of comparison to the 2017 data viewer (e.g., show the rasters for land loss/gain from 2017 overlaid with 2023, or show rasters where those extents differ).

Thanks!

Andrew



Andrew Kazal (he/him), Climate Change & Sustainability Researcher  
[icf.com/climate/work](https://icf.com/climate/work) | [LinkedIn](#)

## CPRA Master Plan

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**From:** John-Dale-Zach Lea  
**Sent:** Tuesday, January 31, 2023 10:53 AM  
**To:** Master Plan  
**Cc:** Chip Kline; Charles Sutcliffe  
**Subject:** Public Comment on Mid Barataria Sediment Diversion

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

The MBSD project should be scrapped and the funds reprogrammed to more economically efficient marsh building projects like the Lake Borgne Marsh Building Project. On a simple cost-per-acre-built assessment, the Lake Borgne project is a much better use of public funds for protecting and restoring our coastal zone. The MBSD costs \$156,000 per acre. The Lake Borgne project costs \$42,000 per acre. The Lake Borgne project is approximately four times more cost effective than the MBSD.

The Lake Borgne project will provide approximately 4 square miles of protected (by levees), brackish water marsh in less than 5 years. The MBSD will provide 25 square miles of unprotected (no levees), fragile, freshwater marsh (poor storm protection) in 50 years. The 25 square miles of freshwater marsh (expected of MBSD) could be destroyed by a single hurricane: Hurricanes Katrina and Rita destroyed 200 square miles of coastal land. Hurricane Ida destroyed approximately 100 square miles of coastal land.

The Lake Borgne project is more ecologically sound than the MBSD. The MBSD will flood the Barataria Basin with pollution-carrying, fresh Mississippi River water. Because oysters cannot survive in fresh water, the MBSD will destroy the oyster fishery (approximately 50% of the State's oyster production) in Barataria Basin.

The MBSD is not essential for the protection and restoration of our coastal zone and is inconsistent with the CPRA mandate to protect and restore coastal communities and renewable natural resources. Please deprogram the MBSD. Use the funds to build protected marsh and hard land like the Lake Borgne project and the Queen Bess Island rebuild project.

John Dale "Zach" Lea, Ph.D.

Agricultural Economist, Exclusive Shellevator Dealer for Louisiana  
Coastal Development Projects

## CPRA Master Plan

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**From:** Robert Gorman  
**Sent:** Monday, February 6, 2023 7:50 PM Master  
**To:** Plan  
**Subject:** Public Comment

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

To whom it may concern:

I am a member of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I raised my family at our home along Bayou Lafourche and my wife is a native of Chauvin, LA where she was born and raised. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan.

Coastal land loss is one of the most significant and urgent issues facing our state. As such, restoration projects must be implemented as soon as possible. With every minute lost, we are losing ground. Our state must act to advance an equitable, safe and flourishing coast for Louisiana's communities, ecosystems and economy.

Louisiana has made significant progress in implementing restoration projects across the coast. We must continue. To ensure a better future for our state, we must move forward to build and sustain the Mississippi River Delta.

Because they can make the most impact over time and support other investments made in restoration and risk-reduction projects, I believe the state should focus funding on large-scale projects first.

I strongly support the draft Coastal Master Plan. I am encouraged to see that it includes implementation periods that prioritize how projects should be advanced over time. I also support the Master Plan process, as it is publicly informed and grounded in the best available science. It also balances coastal restoration with protection and is realistic about the challenges we face along our coast.

This process should serve as a model for how to involve experts, residents and other stakeholders in the decisions, and the foundation in science is of critical importance.

I encourage the state to continue to find opportunities to reach wider audiences. I also encourage CPRA to continue to find new and accessible ways to include all stakeholders in the process. The Master Plan Viewer is a welcome tool for communicating with people about projects in their own backyards.

Robert D. Gorman

## CPRA Master Plan

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**From:** Wesley Kelso <kelso.wesley@yahoo.com>  
**Sent:** Monday, February 6, 2023 8:14 PM  
**To:** Master Plan  
**Subject:** MBS Diversion

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

According to the United States Geological Survey (USGS), Louisiana's rate of land loss ranges from 10.8-32 square miles per year. Whereas, the final Environmental Impact Statement (EIS) for the Mid Barataria Sediment Diversion project states that the project is expected to create approximately 20.9 square miles by 2070 (ES.4.1 Geology and Soils, ES-7).

Using the rate of land loss from the USGS, in the next 50 years, Louisiana is expected to lose anywhere from 540-1600 square miles. Why are we squandering nearly \$2 billion on a project that will not create even a fraction of the land that we will lose in this timeframe?

As a resident of the southern part of Plaquemines parish we as a community will not survive without our seafood industry and if our people can't work we won't have a community at all this is what the Mid-Barataria diversion is going to do to our community's.

Kill our shrimp, Oysters, fish and let's not forget about the impact it will do to the wildlife. So ask any person from my area Dredging is the way to go.

SO STOP TRYING TO KILL MY HOME TOWN

[Sent from Yahoo Mail on Android](#)



## CPRA Master Plan

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**From:** Will Norman  
**Sent:** Tuesday, February 7, 2023 8:11 AM  
**To:** Master Plan  
**Cc:** Will Norman  
**Subject:** Public Comment

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

To whom it may concern:

I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan.

Coastal land loss is one of the most significant and urgent issues facing our state. As such, restoration projects must be implemented as soon as possible. With every minute lost, we are losing ground. Our state must act to advance an equitable, safe and flourishing coast for Louisiana's communities, ecosystems and economy.

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**Will Norman**  
Sr. Client Services Lead

**SWCA Environmental Consultants**  
1651 Lobdell Ave, Bldg. A  
Baton Rouge, LA 70806  
P 225.320.5896 | C 225.636.0114



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## CPRA Master Plan

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**From:** Jane Bladsacker  
**Sent:** Tuesday, February 7, 2023 8:19 AM Master  
**To:** Plan  
**Subject:** Public comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Once again, I object to the mid barataria diversion of the Mississippi River. I object to the affects this diversion will have on the brown shrimp, oysters, dolphins, and wild life as they pour fresh water into the bayous. I object to the devastation to the communities and neighborhoods it will cause as we are flooded out. I am for saving the coast of La. I am for building the marsh. But, I am for dredging and other proven methods of saving the coast that does not kill and destroy marine life, occupations, and whole communities! The water that will be forced into our neighborhoods to flood our streets, our homes, our vehicles for possibly 180 days out the year, will destroy our homes, marine life, and bring with it toxins and pollution that may cause health issues. How is this okay? It's being kept a secret from the public that our neighborhoods will be manually flooded out for up to 180 days a year! This will destroy our homes as well as many people's occupation and way of living. This is not a few "camps" and "vacation homes" that are affected, as has been reported, to down play the fact that this is our houses ... we live here year round. No, we live here as a community. These are our homes! We have no place to go when the streets will be flooded for 180 days! No access in or out! How do we go to work, school, get groceries? What about the fact that it will flood our vehicles? It will affect our water, no trash pickup because streets will be flooded. No deliveries or mail. We either get out (and go where) or stuck in the middle of a flood! How can this be okay? Could you survive if suddenly you were told there will be 180 days possible of 3ft of water every year flooding your neighborhood, your streets, your vehicles. What would you do? We have poured our entire lives' savings and work into building our home. This is what we have worked for our entire lives with retirement in two more years. And now, everything will be destroyed by an experiment that may or may not work in 50 years and will only add 21 miles of marsh when other proven methods will add that much marsh without the devastation in 3 months!!! And we've heard that even if our homes are offered to be bought out, it will be at a ridiculous rate of 1/3 of what it cost us to build and the original value. How is it okay that you are taking such advantage of people?

I would like to state that I am against the mid Barataria diversion and the destruction and devastation that it will cause to marine life, occupations, peoples homes and communities, as well as their vehicles and houses, streets. I am against the toxins and pollution that will be released in our backyards as the bayou is our backyard. I am definitely for coastal restoration, but, in ways that will not cause destruction and devastation and maybe even health issues to me, my family, and affect real people.

Jane Bladsacker  
Resident of Myrtle Grove

## CPRA Master Plan

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**From:** Kristian Sonnier  
**Sent:** Tuesday, February 7, 2023 10:25 AM  
**To:** Master Plan  
**Subject:** public comment

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

To whom it may concern:

I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan.

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Louisiana has made significant progress in implementing restoration projects across the coast. We must continue. To ensure a better future for our state, we must move forward to build and sustain the Mississippi River Delta.

Because they can make the most impact over time and support other investments made in restoration and risk-reduction projects, I believe the state should focus funding on large-scale projects first.

I strongly support the draft Coastal Master Plan. I am encouraged to see that it includes implementation periods that prioritize how projects should be advanced over time. I also support the Master Plan process, as it is publicly informed and grounded in the best available science. It also balances coastal restoration with protection and is realistic about the challenges we face along our coast.

This process should serve as a model for how to involve experts, residents and other stakeholders in the decisions, and the foundation in science is of critical importance.

I encourage the state to continue to find opportunities to reach wider audiences. I also encourage CPRA to continue to find new and accessible ways to include all stakeholders in the process. The Master Plan Viewer is a welcome tool for communicating with people about projects in their own backyards.

## CPRA Master Plan

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**From:** John-Dale-Zach Lea  
**Sent:** Wednesday, February 8, 2023 11:17 AM  
**To:** Master Plan  
**Subject:** Combine Storm Protection with Oyster Industry Expansion. Scrap the Mid Barataria Sediment Diversion

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

There are, at least, two problems with the Mid-Barataria Sediment Diversion.

#1. It mismanages public funds because the MBSD builds marsh at four times the cost of other CPRA marsh building projects, such as, the CPRA Lake Borgne Marsh Building Project. (\$136,000/acre vs. \$42,000/acre). The MBSD will build 25 square miles of freshwater marsh. That's 1.25% of the 2,000 acres we have lost. So, the MBSD is not essential for coastal protection and restoration---an unnecessary cost. The future without the MBSD could be brighter than foretold by CPRA. The CPRA MBSD project should be scrapped, and the funds reprogramed to more cost-effective marsh building (storm dampening) projects like the CPRA Lake Borgne Marsh Building Project.

#2. It mismanages our unique and, otherwise, renewable oyster resources. The MBSD will flood the Barataria Basin with pollution-carrying, fresh Mississippi River water. (See below) Because oysters cannot survive in fresh water, the MBSD will destroy the oyster fishery in Barataria Basin (approximately 30% of the State's oyster production). If we build the MBSD, storm protection might increase by 25 square miles of freshwater marsh. But some 300,000 acres (469 square miles) of oyster leases/farms will be destroyed.

CPRA is missing the enormous political and financial opportunity of "Combining Storm Protection with the Expansion of the Oyster Industry." With this focus, CPRA would manage the salinity in Barataria Bay for maximum oyster production. CPRA could do this by using rebuilt islands, levees, and terraces to control water flow for salinity management AND reduce storm impacts. With good management of the salinity, 300,000 acres in Barataria Bay could produce 60,000,000 sacks of oysters. That's 33 times the State's typical annual production of about 1,800,000 sacks. MBSD destroys that potential future.

Why trade 470 square miles of oyster resource for 25 square miles of freshwater marsh? Why not combine storm protection with the expansion of the oyster industry?

See: <https://www.coastalnewsintoday.com/post/tx-hurricane-harvey-more-than-doubled-the-acidity-of-texas-galveston-bay-threatening-oyster-reefs>



John Dale "Zach" Lea, Ph.D.  
Agricultural Economist, Exclusive Shellevator Dealer for Louisiana  
Coastal Development Projects

## CPRA Master Plan

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**From:** KENNETH RAGAS  
**Sent:** Wednesday, February 8, 2023 3:32 PM  
**To:** Master Plan  
**Subject:** Attachment tells it all!!  
**Attachments:** CCI\_000011.jpg

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

# Use Mid-Barataria Diversion to provide needed pipelining, dredging

Viability of the Mid-Barataria Sediment Diversion depends on the scientific approach used by the Coastal Protection & Restoration Authority. My scientific background and common sense tell me that the project is experimental.

The scientific method does not include using current parameters spread over a 50-year period. That's impossible.

Who is to tell what Mississippi River specs will be next year, let alone in a 50-year period?

The future configuration and composition is an unknown. It depends on what future leaders determine. Government structures will determine current unknowns.

Plaquemines and St. Bernard parishes have opposed the diversions. Parts of Jefferson Parish's coastal areas will also be directly affected, including Lafitte and Grand Isle.

This means southeast Louisiana citizens are being ignored. Why? Affected citizens need and want additional storm surge protection. Diversions will not provide it.

Timely storm surge protection can

be provided by other proven methods. Dredging and pipelining have been effectively used elsewhere. The CPRA believes that method will be too costly.

The CPRA uses the river as the source of borrow to determine cost-effectiveness of that type of project. The cost of pipelining from the river is not the best method.

Past projects include using borrow mined just offshore from west bank barrier islands. That area has been cored extensively from the mouth of Southwest Pass to Grand Isle. Cores show the composition as being excellent and short pipelines can be used as was done on the Bayou Grand De Liard ridge restoration project. The borrow cost for that project was supplied by Weeks Marine for \$6 per cubic yard using a seven-mile pipeline. River dredging and pipelining cost about \$18 per cubic yard.

Using the \$2.5 billion cost of the MBSD to fund dredging and pipelining will provide a timely source of needed storm surge protection.

**KEN RAGAS**  
retired FEMA  
Algiers



**From:** Glenn Michael Harper  
**Sent:** Wednesday, February 8, 2023 5:47 PM  
**To:** Master Plan; Glenn Michael Harper  
**Subject:** Harper Comment on the Official Written 2023 draft Coastal Master Plan

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

*Re: Harper Comment on the Official Written  
2023 draft Coastal Master Plan*

One Word: **REVETMENT!!!!!!**

Stop wasting **Billions** of dollars on **pumping sand**.

Let's build something with our **Billions** of dollars besides **big piles of sand**.

The **US Army Corps of Engineers** are the experts in **REVETMENT**.

We have successfully tamed the Mississippi River and Tributaries with over 3700 miles of **REVETMENT**.



Surely we can do the same for the Louisiana Coast.

**REVETMENT!!!!**

## CPRA Master Plan

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**From:** Terrence Lockett  
**Sent:** Thursday, February 9, 2023 8:40 AM  
**To:** Master Plan  
**Subject:** Public Comment

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

To whom it may concern:

I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan.

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Louisiana has made significant progress in implementing restoration projects across the coast. We must continue. To ensure a better future for our state, we must move forward to build and sustain the Mississippi River Delta.

Because they can make the most impact over time and support other investments made in restoration and risk-reduction projects, I believe the state should focus funding on large-scale projects first.

I strongly support the draft Coastal Master Plan. I am encouraged to see that it includes implementation periods that prioritize how projects should be advanced over time. I also support the Master Plan process, as it is publicly informed and grounded in the best available science. It also balances coastal restoration with protection and is realistic about the challenges we face along our coast.

This process should serve as a model for how to involve experts, residents and other stakeholders in the decisions, and the foundation in science is of critical importance.

I encourage the state to continue to find opportunities to reach wider audiences. I also encourage CPRA to continue to find new and accessible ways to include all stakeholders in the process. The Master Plan Viewer is a welcome tool for communicating with people about projects in their own backyards.

Terrence D.Lockett M.Ed CCC-SLP-L Orbis non sufficit

## CPRA Master Plan

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**From:** Chris Washington <noreply@crcl.org>  
**Sent:** Monday, February 13, 2023 10:46 AM  
**To:** Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Chris Washington

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Thank you

## CPRA Master Plan

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**From:** Ms. Nathalie Camus <noreply@crcl.org>  
**Sent:** Monday, February 13, 2023 10:56 AM  
**To:** Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Nathalie Camus

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## CPRA Master Plan

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**From:** George Bond <noreply@crcl.org>  
**Sent:** Monday, February 13, 2023 11:00 AM  
**To:** Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

George Bond

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## CPRA Master Plan

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**From:** Ms. Kelly Riley <noreply@crcl.org>  
**Sent:** Monday, February 13, 2023 11:01 AM  
**To:** Master Plan  
**Subject:** Coastal Master Plan

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Kelly Riley

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Thank you

## CPRA Master Plan

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**From:** Ryan Hanson <noreply@crcl.org>  
**Sent:** Monday, February 13, 2023 11:04 AM  
**To:** Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ryan Hanson

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Thank you



## CPRA Master Plan

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**From:** Ms. Barbara K. Johnson <noreply@crcl.org>  
**Sent:** Monday, February 13, 2023 11:18 AM  
**To:** Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Barbara K. Johnson

I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan.

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Key projects for the New Orleans area that protect 1.5 million people from hurricanes and storm surge include: (1) New Orleans Land Bridge Projects; (2) Restoration of Bayou Bienvenue Triangle; and (3) Bayou Terre Aux Bouef Ridge.

I strongly support the draft Coastal Master Plan. I am encouraged to see that it includes implementation periods that prioritize how projects should be advanced over time. I also support the Master Plan process, as it is publicly informed and grounded in the best available science. It also balances coastal restoration with protection and is realistic about the challenges we face along our coast. This process should serve as a model for how to involve experts, residents and other stakeholders in the decisions, and the foundation in science is of critical importance.

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## CPRA Master Plan

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**From:** Mr. Christian Britto <noreply@crcl.org>  
**Sent:** Monday, February 13, 2023 12:09 PM  
**To:** Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Mr. Christian Britto

I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan.

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## CPRA Master Plan

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**From:** Debasri Roy <noreply@crcl.org>  
**Sent:** Monday, February 13, 2023 12:11 PM  
**To:** Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Debasri Roy

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## CPRA Master Plan

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**From:** Lance Speidell <noreply@crcl.org>  
**Sent:** Monday, February 13, 2023 12:47 PM  
**To:** Master Plan  
**Subject:** Public Comment on CMP

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

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Thank you

## CPRA Master Plan

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**From:** Rob Gardiner  
**Sent:** Monday, February 13, 2023 12:56 PM  
**To:** Master Plan  
**Subject:** State plan

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Dear Sir/Madam,

I am writing to express my support for the update to the state's master plan for coastal restoration. It is the most important priority that Louisiana faces, and we need to direct as many resources as we can muster to address it. In addition, the urgency is a five-alarm equivalent, as it is far better to protect what we still have than to try to recover what has been lost. I want to emphasize several aspects of the plan, in particular.

1. It is great that we have movement at last toward building the two huge river diversion projects. Smaller diversions further up-river are urgently needed as well. Davis Pond and Carnarvon have shown how valuable small diversions can be wherever they are feasible. Ama, Union, Violet, and other sites should be explored and planned for the next round of funding.
2. The potential for allowing more spontaneous crevasses such as Mardi Gras Pass and Neptune Pass on the east side of the river to allow nature's enormous power to restore wetlands through the redevelopment of natural delta land building processes should be considered. The more sediment that can be directed to a variety of sites that are well north of the Birdsfoot, the better for everyone. We need to do some of these cheaply and without fully engineered approaches.
3. Louisiana needs to increase its efforts to obtain Federal funding to protect national assets within Louisiana, including waterfowl habitat, fisheries nursery areas, oil and gas infrastructure, transportation corridors, and other resources that are national in nature and have been damaged by excessive levee building by the USACOE. We also need to put priority on balancing the navigational mission of USACOE with the environmental needs for wetlands sedimentation renewal. If this means making better use of dredge "spoil" for beneficial wetlands restoration, even at higher costs than other disposal methods, it should be required of the Corps.
4. Science should drive decision-making, not politics. Public opinion is strongly on the side of diversions to reintroduce annual sediment delivery into wetlands, in line with the science that has demonstrated how well restoration projects work. Many of the negative, short term, economic impacts on the fishing industry may require compensatory payments, but the future of fishing in a collapsing wetlands area is equally devastating to those commercial interests. It is just that the restoration projects may seem a more imminent threat. In truth, the threat of losing our wetlands habitat and its ability to reduce the impact of hurricanes is hundreds of times greater. A far larger number of people and resources need that protection.

Sincerely,

Robert Gardiner

## CPRA Master Plan

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**From:** debbie savoie  
**Sent:** Monday, February 13, 2023 6:45 PM  
**To:** Master Plan  
**Subject:** Public comment

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

For the record, I support and recommend shoreline protection projects and storm surge protection projects to be my highest priorities for the future of planning within the State Coastal Master Plan for SWLA."

Sincerely,

Debbie Savoie

Cameron Parish Resident

## CPRA Master Plan

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**From:** Chad Chauffe <noreply@crcl.org>  
**Sent:** Tuesday, February 14, 2023 3:09 PM  
**To:** Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Chad Chauffe

Growing up around New Iberia I've always heard of the shocking statistic of Louisiana losing about a football field's worth of coastline every hour. It has always stood out in my mind. Now as an adult and resident of the greater New Orleans metro area, I have become a volunteer in my community for the sake of giving back to my beautiful state and fighting coastal erosion and land loss. I primarily volunteer at organizations like the Coalition to Restore Coastal Louisiana (CRCL) a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all.

Having said all of that, I am writing today to contribute my public comments and voice my support for the draft 2023 Coastal Master Plan.

Coastal land loss is one of the most significant and urgent issues facing our state. As such, restoration projects must be implemented as soon as possible. With every minute lost, we are losing ground. Our state must act to advance an equitable, safer and flourishing coast for Louisiana's communities, ecosystems and economy. Louisiana has made significant progress in implementing restoration projects across the coast. We must continue. To ensure a better future for our state, we must move forward to build and sustain the Mississippi River Delta. Because they can make the most impact over time and support other investments made in restoration and risk-reduction projects, I believe the state should focus funding on large-scale projects first.

I strongly support the draft Coastal Master Plan. I am encouraged to see that it includes implementation periods that prioritize how projects should be advanced over time. I also support the Master Plan process, as it is publicly informed and grounded in the best available science. It also balances coastal restoration with protection and is realistic about the challenges we face along our coast. This process should serve as a model for how to involve experts, residents and other stakeholders in the decisions, and the foundation in science is of critical importance.

I encourage the state to continue to find opportunities to reach wider audiences. I also encourage CPRA to continue to find new and accessible ways to include all stakeholders in the process. The Master Plan Viewer is a welcome tool for communicating with people about projects in their own backyards.

Thank you

## CPRA Master Plan

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**From:** Kris Bonsall  
**Sent:** Wednesday, February 15, 2023 9:55 AM  
**To:** Master Plan  
**Subject:** Public Comment

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

"For the record, I support and recommend shoreline protection projects and storm surge protection projects to be my highest priorities for the future of planning within the State Coastal Master Plan for SWLA."



## CPRA Master Plan

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**From:** Vickie Kiffe  
**Sent:** Thursday, February 16, 2023 8:51 AM  
**To:** Master Plan  
**Subject:** Public Comment

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

"For the record, I support and recommend shoreline protection projects and storm surge protection projects to be my highest priorities for the future of planning within the State Coastal Master Plan for SWLA."

Thanks

Vickie Kiffe

## CPRA Master Plan

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**From:** TINA SAVOIE  
**Sent:** Thursday, February 16, 2023 10:27 AM  
**To:** Master Plan  
**Subject:** Support for shoreline protection

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

To Whom It May Concern:

I support and recommend shoreline protection projects and storm surge protection projects to be my highest priorities for the future of planning within the State Coastal Master Plan for SWLA."

Thank you,

Tina Savoie

## CPRA Master Plan

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**From:** Cameron Parish Waterworks District #2  
**Sent:** Thursday, February 16, 2023 10:38 AM  
**To:** Master Plan  
**Subject:** Public Comment

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

For the record, I support and recommend shoreline protection projects and storm surge protection projects to be my highest priorities for the future of planning within the State Coastal Master Plan for SWLA.

*Thank you,  
Shaun Kyle  
Office Manager  
Cameron Parish Waterworks District 2*

## CPRA Master Plan

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**From:** Kevin Savoie  
**Sent:** Thursday, February 16, 2023 12:17 PM CPRA  
**To:** Master Plan  
**Subject:** Draft Master Plan 2023 comments  
**Attachments:** CPRA comments23.docx

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Please consider my attached comments.

2/16/23

CPRA Draft 2023 Coastal Master Plan Public comments

By Kevin A. Savoie, Louisiana Sea Grant Agent, coastal landowner, and lifelong resident of Cameron Parish

I am writing in support of projects which will improve hydrology/drainage in the chenier plain region of the coast. These projects should also be constructed and managed with future projects in mind, specifically CS-87. I am in support of this project along with the recommendation to consider future hydrologic modifications to the washout/ ship channel interface. Rebuilding in the right of way of the Calcasieu Ship Channel spoil area; an armored levee containment feature would serve many benefits:

1. Would enhance fisheries production in the Calcasieu Lake estuary by reducing the ~ 4-mile-wide opening from the ship channel to the lake, down to 4-5 (or whatever would be deemed most effective) gaps. This would reduce the volume of tidal amplitude, yet direct water flows through the gaps and into the lake, keeping oyster reefs in the lake adjacent to these gaps swept clean, healthy, and sustainable.
2. Healthy oyster populations near these gaps would become a mecca for coastal fishermen pursuing spotted seatrout, redfish, black drum, sheepshead, flounder as well as habitat for the many nontarget finfish and crustaceans, and many other estuarine species.
3. Improved water flows adjacent to these gaps would be ideal sites for future cultch plants to enhance the oyster production in the east side of Calcasieu Lake's conditional management area 29. This area has been in decline for many years now and is experiencing very slow recovery, while West Cove, conditional management area 30 had a stock assessment increase of 3-4 fold over the last 3 years.
4. Provide additional dredge containment area for many projects in the Cameron area as well as future dredging projects on the Calcasieu ship channel.
5. These containment areas could be used as additional nesting grounds for the growing populations of Brown Pelicans and other shorebirds currently nesting on Rabbit Island in the nearby West Cove.

I am opposed to any dedicated dredging projects which use Calcasieu Lake bottom as a borrow site. Putting sediments in suspension undoubtedly, has negative effects on the productivity of the Calcasieu Lake estuary.

## CPRA Master Plan

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**From:** Kyla Richard  
**Sent:** Thursday, February 16, 2023 2:15 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

"For the record, I support and recommend shoreline protection projects and storm surge protection projects to be my highest priorities for the future of planning within the State Coastal Master Plan for SWLA."



## CPRA Master Plan

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**From:** Chris Savoie  
**Sent:** Friday, February 17, 2023 9:41 AM CPRA  
**To:** Master Plan  
**Subject:** CPRA public hearing

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

To whom it may concern,

For the record, I support and recommend shoreline protection projects and storm surge protection projects to be my highest priorities for the future of planning within the State Coastal Master Plan for South West Louisiana.

Chris Savoie

## CPRA Master Plan

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**From:** David French  
**Sent:** Friday, February 17, 2023 10:54 AM CPRA  
**To:** Master Plan  
**Subject:** public comment

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

"For the record, I support and recommend shoreline protection projects and storm surge protection projects to be my highest priorities for the future of planning within the State Coastal Master Plan for SWLA."

Thank you,

*Capt. David R. French, Warden*  
**Cameron Parish Sheriff's Office**  
*124 Recreation Center Lane*  
*P. O. Box 1250*  
*Cameron, LA 70631*  
*Main: (337) 775-5111*  
*Office: (337) 775-2127*  
*Cell: (337) 796-1289*





## CPRA Master Plan

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**From:** Michele Long  
**Sent:** Friday, February 17, 2023 3:22 PM  
**To:** CPRA Master Plan  
**Cc:** Russell Badon; Tammy Erbelding; Nikki Norman; Gmail; Sonny McGee; Bourriaque Rep. Ryan (District Office)  
**Subject:** Public Comment  
**Attachments:** Cameron Parish Beachfront Development District #1.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.



## **Cameron Parish Beachfront Development District #1**

When industry, parish government, and community  
come together, great things can happen.

Join us on Facebook "Cameron Parish Beachfront Development District #1"

**See attached comment/Letter of Support**

😎 *Seas the Day!!!*

## **Cameron Parish Beachfront Development District #1 Johnson Bayou • Holly Beach**

Dear Louisiana Coastal Protection & Restoration Authority,

We, the Cameron Parish Beachfront Development District #1, are writing in support of the Cameron Gulf Shoreline Restoration Project in the FY24 Plan of the Coastal Master Plan.

Past restoration efforts have proved successful in accruing sand and preventing further erosion along areas of beaches that received rock breakwaters in 2021. By “strengthening, expanding, and extending existing rock breakwaters,” the Cameron Gulf Shoreline Restoration Project will continue the vital task of protecting our Southwest Louisiana communities.

Cameron Parish Beachfront Development District #1 will continue seeking effective ways to reduce the risk of erosion from hurricanes and sea level rise. Hardening our coast with rock breakwaters will not only help our communities but also marshes and communities to the north.

Respectfully,

Cameron Parish Beachfront Development District #1 Commissioners

Russell Badon  
Tammy Erbelding  
Michele Long  
Nikki Norman



148 Smith Circle  
Cameron, LA 70631

(409) 893-2154

[Mlong0813@yahoo.com](mailto:Mlong0813@yahoo.com)

Cameron Parish Beachfront  
Development District #1-Facebook

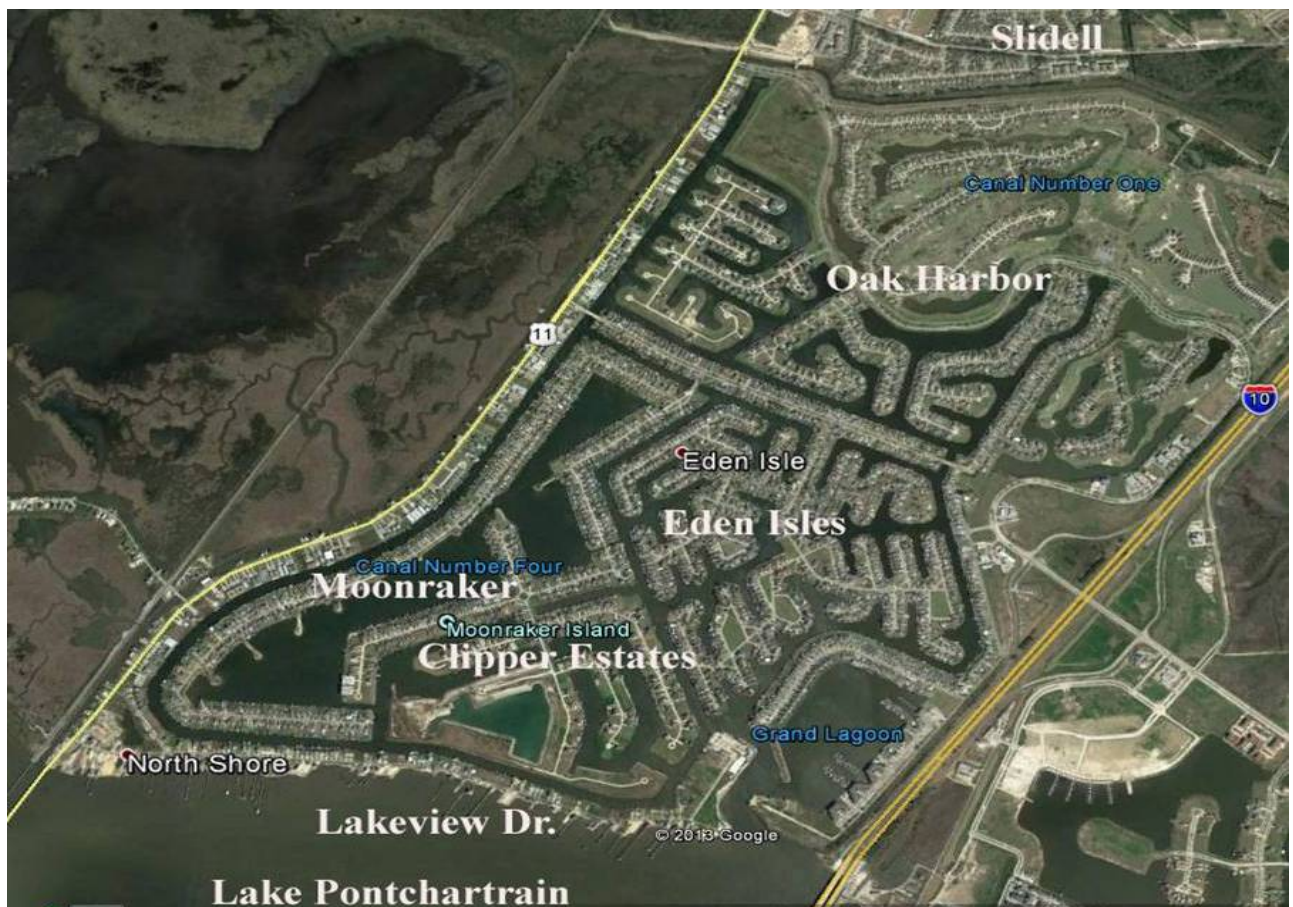
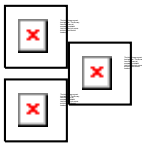


## CPRA Master Plan

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**From:** Thomas Thompson  
**Sent:** Friday, January 13, 2023 8:09 AM  
**To:** Master Plan  
**Cc:** Chip Kline; Brent.Haase@la.gov; Skrieger.stldcd@aol.com; shewitt@legis.la.gov; Hse090@legis.la.gov; Robyn@mail.house.gov; mcooper@stpgov.org; Jake.airey@stpgov.org; rbpausina@stpgov.org;  
Comments to the 2023 DRAFT Coastal Master Plan for documentation  
  
**Subject:**

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.



I respectfully request the CPRA honor their commitment to Eden Isles and “unequivocally” include the Eden Isles structural protection plan in the state’s coastal master plan.

Only one sentence in the draft 2023 master plan on pages 153, addresses protection for Eden Isles and, it simply says:

*“USACE’s TSP included a significant nonstructural component. As this project progresses, CPRA, USACE, and St. Tammany Parish will look for opportunities to further reduce risk for communities like Eden Isles that sit outside of the current structural protection alignment.”*

**“To look for opportunities” IS NOT A COMMITMENT** to the communities at the highest risk from surge-based flooding in coastal Louisiana.

**A true commitment statement would read as follows:**

CPRA structural projects shall be implemented to supplement the USACE’s TSP plan in order to extend structural protection to the state’s highest risk communities like Eden Isles that sit outside of the current structural protection alignment.

In addition, the Eden Isles structural protection project needs to be included in the list of Master Plan structural risk reduction projects.

ID#	Project Name	Description	IP	Cost \$
TBD	Eden Isles structural protection Project	Provide structural protection to the community south of Slidell, north of Lake Pontchartrain, east of Highway 11, and west of Interstate 10. The project will feature a gate and pump station at the mouth of the Oak Harbor Marina in addition to additional surge reduction structures.	?	100M

The CPRA must honor their commitment to unequivocally include the Eden Isles’ structural protection plan into the 2023 master plan\*.

\* CPRA leadership commitments made:

**2021-07-08**, State Senator Sharon Hewitt, CPRA Chairman Chip Kline, President St. Tammany Parish Mike Cooper, Chairman St. Tammany Levee District Suzanne Krieger, along with local, parish and state officials met in support of the USACE St. Tammany flood protection Feasibility Study. In addition, the group agreed to supplement the USACE plan with the CPRA, STPG, STLDCD protection plan for Eden Isles to provide a resilience project for Eden Isles through evaluation of the following:

- Resilience and Elevation of Roadway Corridors, raising and flood-proofing of the roadway corridor around Eden Isles (I-10, Highway 11, and Lakeview Drive)
- Floodgate & Pump Station Complex, potential floodgate and pump station complex at Eden Isles Grand Lagoon

Implementation of the project can be conducted through the following items

- STPG and STLDCD will begin evaluating the roadway improvements using the existing funding through the St. Tammany Parish Coastal Study
- STPG and STLDCD will work to secure funding for the project through the Louisiana Watershed Initiative or other sources
- CPRA will work to include the Eden Isle Resilience Project in the State’s 2023 Coastal Master Plan and will utilize existing funding to evaluate the design and benefits of a floodgate/pump station complex at Eden Isles
- St. Tammany Parish Northshore Delegation will continue to work to appropriate funding as needed through Capital Outlay or other sources

- **2021-08-13**, Meeting held by Congressman Steve Scalise and State Senator Sharon Hewitt. Others in attendance were: CPRA Chairman Chip Kline, CPRA Operations Chief Ignacio Harrouch, President St. Tammany Parish Mike Cooper, Chairman St. Tammany Levee District Suzanne Krieger, Vice-Chairman St. Tammany Levee District John Faust, Councilman St. Tammany Parish Jake Airey. All in attendance agreed that the St. Tammany Levee Board/St. Tammany Parish Government's preferred plan for communities like Eden Isles that sit outside of the current structural protection alignment be funded and included in the 2023 state master plan

- **2022-03-15**, Meeting with Governor Edwards, where the CPRA committed to including protection plans for Eden Isles, Military Road and Highway 433 areas in the 2023 master plan. The meeting was attended by: CPRA Chairman Chip Kline, Director of Intergovernmental Affairs Russell Caffery, President St. Tammany Parish Mike Cooper, Chairman St. Tammany Levee District Suzanne Krieger, Vice President Neel-Schaffer, Inc. Glenn Ledet

**2022-10-19**, Monthly CPRA meeting held in St. Bernard Parish, the CPRA Chairman committed to include the Eden Isles structural protection plan in the 2023 master plan once he received a formal request from State Senator Sharon Hewitt, President of the St. Tammany Parish Michael Cooper, and Chairman of the St. Tammany Parish Levee District Suzanne Kreiger

**2022-11-04**, The formal request from State Senator Sharon Hewitt, President of the St. Tammany Parish Michael Cooper, and Chairman of the St. Tammany Parish Levee District Suzanne Kreiger, was sent in accordance with the CPRA Chairman's "FINAL" requirement needed to include flood risk reduction projects for South Slidell, Eden Isles, Highway 433 and Military Road into the 2023 master plan

**2022-11-16**, Monthly CPRA meeting held in St. Tammany Parish, the CPRA Chairman committed to include an Eden Isles structural protection plan in its 2023 master plan

**2022-11-16**, CPRA public 2023 master plan meeting held in Lacombe, Bren Haase, CPRA Executive Director committed to include an Eden Isles structural protection plan in its 2023 master plan

Sincerely,

Tom Thompson

## CPRA Master Plan

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**From:** Kip Paxton  
**Sent:** Saturday, February 18, 2023 1:53 PM  
**To:** CPRA Master Plan  
**Subject:** The Future of the Coast is in Your Hands

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Hi,

My name is Kip, and I just want to say that when I saw that the Mid-Barataria Sediment Division had actually been approved and funded, I very nearly cried. I'm from Louisiana originally, and even though I'm in the northeast now, I still have a deep connection to the coast. This plan is the best thing that has ever happened; I'm continually stunned that it actually passed. It is a great first step, and the long-term benefits absolutely outweigh the short-term detriments.

I'd much rather have a healthy coast in 50 years than cheap oysters and speckled trout tomorrow.

On that note, I come to the point. Please, please, PLEASE don't let the fishing community convince you to pull the plug on the Coastal Master Plan. Don't let it fall quietly into obscurity. I read that the next phase is going to be considered in August and next year as well; by that point the South is going to be feeling the economic effects of the diversion. The fishing community is going to use this to get more people on their side; please don't let them. The future of our coast is more important than this. The future of Louisiana's wetlands is more important than this and is too important to let economics determine its fate this time. We can't afford it; the COAST can't afford it, and the irony is that those who are the most active opponents to this plan are the ones who have the most to lose if it fails.

Don't lose sight of the goal in the face of the coming turmoil. You've already helped a great thing happen; I hope and pray that you can usher in even more.

Thank you for your time,

Kip Paxton



## CPRA Master Plan

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**From:** Salvador Naranjo  
**Sent:** Sunday, February 19, 2023 12:06 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

For the record, I support and recommend shoreline protection projects and storm surge protection projects to be my highest priorities for the future of planning within the the State Coastal Master Plan for SWLA.

Salvador Naranjo  
Cameron Parish Resident

Sent from my iPhone

## CPRA Master Plan

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**From:** Marina Clay  
**Sent:** Wednesday, February 22, 2023 9:27 AM  
**To:** CPRA Master Plan  
**Subject:** FW: Comments on CPRA 2023 Master Plan  
**Attachments:** RESTOREcmts2023CWPRAMasterPlan.doc; MigratoryClock2021.pdf

Comments from Michael Tritico below!

**Marina Gelpi Clay** | Coastal Protection and Restoration Authority

Director of Communications and Engagement  
150 Terrace Avenue | Baton Rouge, LA 70802  
o: 225.342.0168 | c: 985.718.8560  
[www.coastal.la.gov](http://www.coastal.la.gov)



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**From:** GOV Coastal <coastal@LA.GOV>  
**Sent:** Tuesday, February 21, 2023 3:32 PM  
**To:** Marina Clay <Marina.Clay@la.gov>; Nick Gremillion <Nick.Gremillion@la.gov>  
**Subject:** FW: Comments on CPRA 2023 Master Plan

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**From:** Michael Tritico  
**Sent:** Tuesday, February 21, 2023 3:30:28 PM (UTC-06:00) Central Time (US & Canada)  
**To:** GOV Coastal  
**Subject:** Comments on CPRA 2023 Master Plan

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Please accept the attached comments with the also attached Migratory Clock diagram. Thank you.

Michael Tritico  
Restore Explicit Symmetry To Our Ravaged Earth

**RESTORE**  
P.O. Box 233  
Longville, LA 70652  
(337)-725-3690  
[michaeltritico@yahoo.com](mailto:michaeltritico@yahoo.com)

Mardi Gras 2023  
February 21, 2023

Coastal Protection & Restoration Authority  
Master Plan Public Comments  
150 Terrace Avenue  
Baton Rouge LA 70802

RESTORE's Comments on the 2023 Master Plan

Dear Coastal Protection and Restoration Authority:

Thank you for the opportunity to submit comments, again, although it is apparent that the many comments I have submitted through the years have had little to no effect. As I testified in the Public Meeting last week, things that I brought up years ago, using documentations, took years to be recognized, admitted, and incorporated into the planning process. It is now too late to even try to implement some of the things that could have worked had they been done at the proper times.

Nevertheless I am compelled to continue to try to participate in your planning system.

From the deepest parts of the ocean to the top of our atmosphere, from the poles to the Amazon rain forest, from the Gulf Coast beach to the piney woods, humans have ruined what God created.

The other people who spoke at the Burton Coliseum in Lake Charles last week proved that the old mindsets of denial of reality and blind faith in false hopes has not weakened. Calling for more dredgings when dredging is one of the things that destroys the natural equilibria, calling for more levees when levees interrupt natural water flows and sediment distributions, calling for "rocks, rocks, rocks!" when the ocean is swelling to such a height that the mud would not be able to support a wall high enough to keep it out, (and the rocks' deflections of coastal current energies toward Texas would just export problems to those neighbors): those are just wrong-headed wishes from ignorant people who consciously refuse to learn.

CPRA is guilty of sustaining the wishful thinking of Louisiana coastal residents instead of telling them the truths that would help them do smart planning. You must stop exacerbating the coastal problems by failing to show leadership and by instead pandering to a herd mentality.

Fighting nature is a lost cause. Living in harmony with nature is a necessity.

Accordingly, CPRA must dramatically shift its approaches to how it spends the billions of dollars that are being entrusted to it for proper protection of people near coastal areas and proper attempts to restore viable coastal ecosystems.

CPRA must decide if it is really anything other than an enabler, a pawn being manipulated for prolonging a dying experiment in non-sustainable economic practices across the Louisiana coastal zone.

For example, as long as CPRA assumes that the Calcasieu Ship Channel must be allowed to exist, there can be no restoration of natural balance in that region.

Removal of the hemispherical sand bar at the mouth of the Calcasieu River, shortcutting the meander loops upstream, and deepening the channel from 18 feet to 47 feet allows ruinous amounts of saltwater to rush in from the Gulf constantly with the tide and with south winds. When hurricanes come ashore just west of the river, sea water gets into Lake Charles.

Meanwhile CPRA has decided to abandon the project that would have directly blocked the incoming salt water and instead spend that \$300+ million to try to sustain the unnatural replacement of brackish and fresh marshes with salt marshes.

That is the opposite of coastal restoration and a brazen betrayal of the early hopes that had been held out to those of us who tried to believe that things might be changing for the better.

If CPRA wants to do the right thing anywhere in the Calcasieu Basin it must work to get the maritime industry to go to Lighters and stop pushing for dredging. The river must be allowed to return to its functional ecological morphology. Even though sea level is rising, if the river were allowed to silt in to a shallower depth and the hemispherical sand bar were reestablished, the salt burning of fresh marshes would be greatly-slowed. The declines in aquatic biota, such as speckled trout, would be ameliorated. Nature could begin to heal itself and adapt somewhat to climate disruptions.

One thing that should not be too very challenging for CPRA to accomplish as a first step in really facing the Calcasieu Ship Channel disaster would be to calculate how much extra salt comes in for each extra foot of dredged channel depth. I have asked, repeatedly, that those calculations be done and made public but there seems to be some fear of those numbers by the people who want the big ships to be able to get loaded heavier and heavier, without having to pay for the socialist subsidies they get by having someone else pay to dredge, dredge, dredge. Why can CPRA not make part of the 2023 Master Plan a simple project and report: calculation of the degree of saltwater intrusion for each foot of increase in the depth of channel?

On the topic of socialism for faux-capitalists: No longer can CPRA leaders allow selfish corporate projects such as the \$400,000 oilfield road (CS-0047) which, in no way could have been justified as either protective of the public or restorative of wetlands.

No longer can CPRA leaders “throw good money after bad” by spending money to repair previously-authorized and implemented projects damaged by fresh tropical storms. Lessons must be learned. The public has a right to know annually, through a simple report: each project that sustained storm damage during the passage of the latest storms, to what degree, and what possible logic could exist for going back and spending money again only to risk that new investment rather than spending the money more wisely farther inland.

As I said when I spoke at the Public Meeting last week, CPRA would get a lot more “bang for the buck,” by spending money on relocation of people to high ground and elevation of homes for people who actually must live near the coast, people such as shrimpers. It might be a worthwhile expenditure to

establish, on high ground in Beauregard Parish, a dedicated evacuation complex for those renewable-resource harvesters so that they could have a greater degree of protection for their families, a secure place to go during storms that might overwhelm the elevation efforts.

In general, CPRA should tell everyone else to relocate or not expect repetitive financial bailouts with each of the oncoming storms. Cameron Parish will be under the ocean eventually, as will New Orleans, most of Calcasieu Parish, and most of the populated coastal areas of the planet. Giving people false hope should not be a budget item.

The concept of BUDM is, as I have said repeatedly, an oxymoron that every time it is presented shows the shallow-mindedness of planners. Dredging creates numerous problems that moving the mud somewhere else does not solve. Cutting off an arm to cure a wart makes no sense. Beneficial Use of Dredged Material makes the same amount of sense. CPRA must stop participating in that propaganda charade.

Absolutely absent from your 2023 Master Plan is consideration of a very acute coastal problem that could be solved almost immediately! I have previously sent to you documentation of how the invasive species *Bos taurus* does not belong near marshes because it forces natural herbivores such as muskrat and insects toward the centers of the marsh. That creates “overgrazing” and “ponding out” of the marshes.

Accelerating that process was the misguided practice of killing by traps, poisons, and guns the species *Canis rufus* which the Creator had provided as a protective barrier for the marshes. The Red Wolves did that through prevention of the approach of the large herbivore species *Bison bison*. A few generations of a foolhardy heritage that almost caused the extinction of an entire species is no reason to allow that heritage to continue. CPRA should aggressively educate the young people of Cameron Parish that the wetlands will last decades longer without their husbandry of animals not meant to be there. CPRA could buy and butcher all the cattle in the parish and set up STEM scholarships for the young people with a mere fraction of what you will waste on BUDM projects. Just yesterday it was announced that the same problem of *Bos taurus* ruining habitats out west has warranted Federal intervention: [www.usatoday.com/story/news/nation/2023/02/20/feral-cattle-shot-new-mexico-gila/11303462002/](https://www.usatoday.com/story/news/nation/2023/02/20/feral-cattle-shot-new-mexico-gila/11303462002/).

On the topic of education: Why not a Migratory Clock at Port Wonder? At Port Leveque, Australia a pop-culture style version of the local phenomenology has become a tourist attraction. It very colorfully shows when certain things happen there. Something really worthwhile CPRA could do would be to shift a few thousand dollars of money that would be washed away at some token BUDM project near the coast to the Port Wonder project for an interactive Migratory Clock. Children could push buttons to light up icons of shrimp, squid, crab larvae, redfish... to see when and where those things go. I have sent you the Migratory Clock Diagram for the Calcasieu Estuary previously but I am going to attach it again in the hope that you will incorporate it into your planning thoughts as well as implement it in the greatly-needed educational expenditures that you should be prioritizing.

“Rocks, rocks, rocks!” ??? NO!!! Relocation, relocation, relocation!!!

Sincerely,

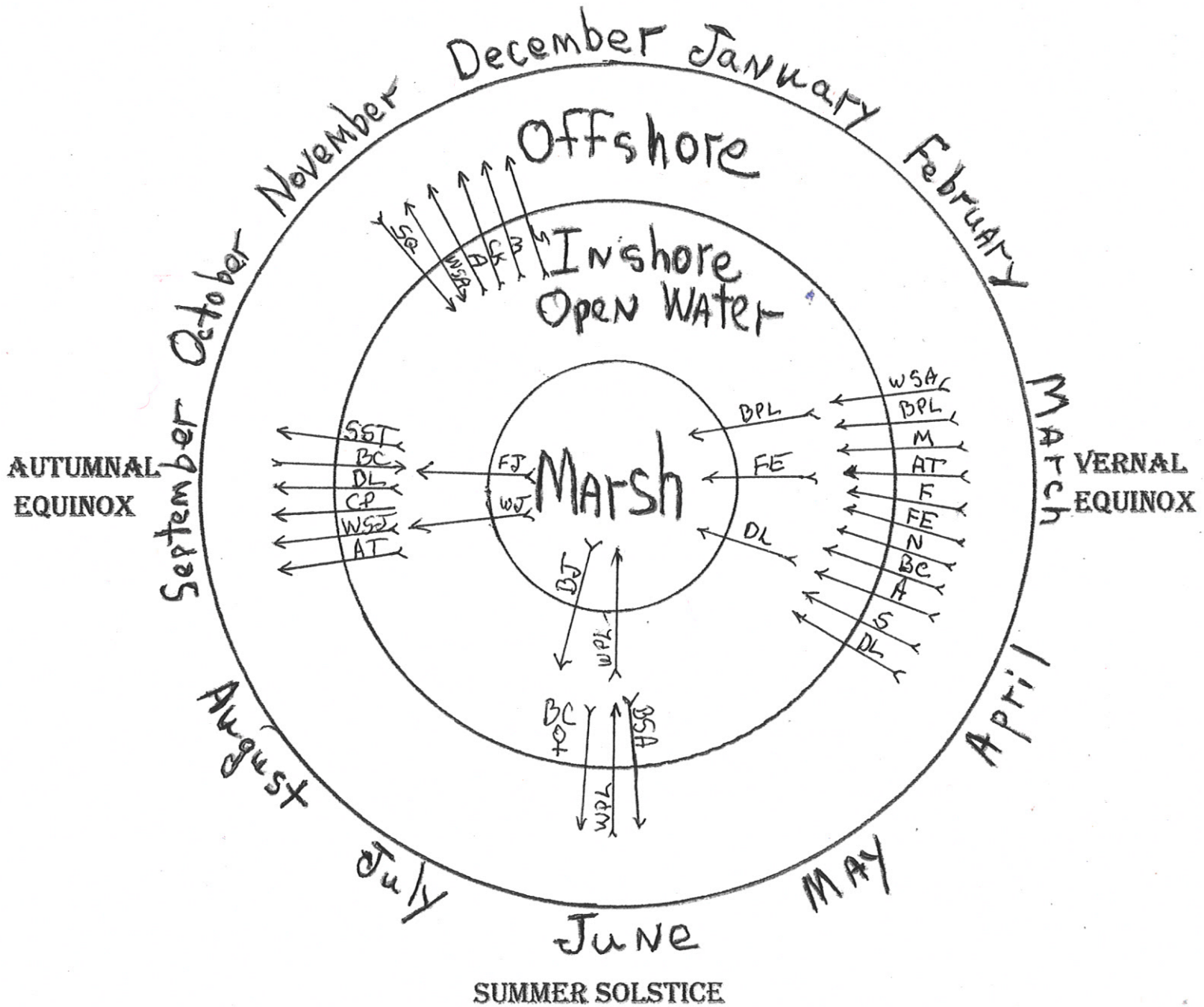
Michael Tritico, Biologist and President of RESTORE  
**Restore Explicit Symmetry To Our Ravaged Earth**

# MIGRATORY CLOCK FOR CALCASIEU REGION

Southwest Louisiana

(Based on 1971 Data from Louisiana Wildlife and Fisheries)

WINTER SOLSTICE



S=Spot  
F=Flounder  
CK=Croaker  
SST=Sand Seatrout  
M=Menhaden  
AT= Atlantic Threadfin  
FE= Fish Eggs  
BC=Blue Crab  
SQ = Squid

Cp=Centropages  
A=Acartia tonsa  
N=Copepod Nauplii  
DL=Decapod Larvae  
WSA=White Shrimp Adult  
WJ=White Shrimp Juvenile  
WPL=White Shrimp Postlarvae  
BSA=Brown Shrimp Adult  
BJ= Brown Shrimp Juvenile  
BPL= Brown Shrimp Postlarvae

## CPRA Master Plan

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**From:** Walt Leger III  
**Sent:** Thursday, February 23, 2023 7:46 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment-2023 Coastal Master Plan

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

To whom it may concern:

I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan. I am also a former Louisiana Legislator who supported previous versions of the Coastal Master Plan and fought to secure funding for critical restoration projects. I continue to be inspired that our state is leading the way in science based planning to build a more resilient Louisiana for future generations.

Coastal land loss is one of the most significant and urgent issues facing our state. As such, restoration projects must be implemented as soon as possible. With every minute lost, we are losing ground. Our state must act to advance an equitable, safe and flourishing coast for Louisiana's communities, ecosystems and economy.

Louisiana has made significant progress in implementing restoration projects across the coast. We must continue. To ensure a better future for our state, we must move forward to build and sustain the Mississippi River Delta.

Because they can make the most impact over time and support other investments made in restoration and risk-reduction projects, I believe the state should focus funding on large-scale projects first.

I strongly support the draft Coastal Master Plan. I am encouraged to see that it includes implementation periods that prioritize how projects should be advanced over time. I also support the Master Plan process, as it is publicly informed and grounded in the best available science. It also balances coastal restoration with protection and is realistic about the challenges we face along our coast.

This process should serve as a model for how to involve experts, residents and other stakeholders in the decisions, and the foundation in science is of critical importance.

I encourage the state to continue to find opportunities to reach wider audiences. I also encourage CPRA to continue to find new and accessible ways to include all stakeholders in the process. The Master Plan Viewer is a welcome tool for communicating with people about projects in their own backyards.

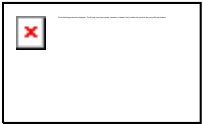
Walt

Walter J. Leger III  
President & CEO

[NewOrleans.com](http://NewOrleans.com)



THE OFFICIAL DESTINATION  
MARKETING AND SALES ORGANIZATION FOR THE  
NEW ORLEANS TOURISM INDUSTRY



Sent from Walt's iPhone



## CPRA Master Plan

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**From:** Donna Betzer <noreply@crcl.org>  
**Sent:** Monday, February 27, 2023 2:44 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Donna Betzer

I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan.

Coastal land loss is one of the most significant and urgent issues facing our state. As such, restoration projects must be implemented as soon as possible. With every minute lost, we are losing ground. Our state must act to advance an equitable, safer and flourishing coast for Louisiana's communities, ecosystems and economy.

Louisiana has made significant progress in implementing restoration projects across the coast. We must continue. To ensure a better future for our state, we must move forward to build and sustain the Mississippi River Delta. Because they can make the most impact over time and support other investments made in restoration and risk-reduction projects, I believe the state should focus funding on large-scale projects first.

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Thank you

## CPRA Master Plan

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**From:** Ms. Robin Morales <noreply@crcl.org>  
**Sent:** Monday, February 27, 2023 2:48 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Robin Morales

I am a supporter of the Coalition to Restore Coastal Louisiana on the draft 2023 Coastal Master Plan. Coastal land loss is one of the most significant and urgent issues facing our state. As such, restoration projects must be implemented as soon as possible. With every minute lost, we are losing ground. Our state must act to advance an equitable, safer and flourishing coast for Louisiana's communities, ecosystems and economy. Louisiana has made significant progress in implementing restoration projects across the coast. We must continue. To ensure a better future for our state, we must move forward to build and sustain the Mississippi River Delta. Because they can make the most impact over time and support other investments made in restoration and risk-reduction projects, I believe the state should focus funding on large-scale projects first.

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Thank you  
Robin MOrales

## CPRA Master Plan

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**From:** Walter Lance Speidell <noreply@crcl.org>  
**Sent:** Monday, February 27, 2023 2:51 PM  
**To:** CPRA Master Plan  
**Subject:** Comment time

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan.

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## CPRA Master Plan

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**From:** David LaBreche <noreply@crcl.org>  
**Sent:** Monday, February 27, 2023 3:08 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan.

It looks like, even with all the planned action, there will still be great land loss. I suggest that the oil and gas industry, which has exploited the coast and off-shore areas, must be mobilized. They do not see any economic advantage for themselves in saving the coast, and our political leaders have not bothered to motivate them. This must change.

Coastal land loss is one of the most significant and urgent issues facing our state. As such, restoration projects must be implemented as soon as possible. With every minute lost, we are losing ground. Our state must act to advance an equitable, safer and flourishing coast for Louisiana's communities, ecosystems and economy.

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Thank you

## CPRA Master Plan

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**From:** Wendy Pabian <noreply@crcl.org>  
**Sent:** Monday, February 27, 2023 3:33 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Wendy Pabian

I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan.

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Thank you

## CPRA Master Plan

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**From:** Ms. Jennifer Bradford <noreply@crcl.org>  
**Sent:** Monday, February 27, 2023 4:11 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Jennifer Bradford

I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan.

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Thank you

## CPRA Master Plan

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**From:** Ms. Allison Vaughn <noreply@crcl.org>  
**Sent:** Monday, February 27, 2023 5:19 PM  
**To:** CPRA Master Plan  
**Subject:** I support coastal restoration efforts

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Allison Vaughn

I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan.

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## CPRA Master Plan

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**From:** morgan miller <noreply@crcl.org>  
**Sent:** Monday, February 27, 2023 5:27 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment

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Thank you



## CPRA Master Plan

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**From:** Shannon Sipher <noreply@crcl.org>  
**Sent:** Monday, February 27, 2023 6:25 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment / Public Dredge Fleet

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

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I think lawmakers need to consult with Megan Milliken Biven on her plan for a Public Dredge Fleet to help rebuild our starved coasts. [https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_url5121.crcl.org\\_ls\\_click-3Fupn-3Dx3fBoDjLoK7Tcxhnw1aZtIXLYmSBmCb3I74hTavpXZ987pQfQfgK2AHxzaX3ShlQKlGnx7Z3QqTZsAR9PKm-2D2F0Y7c-2D2FeknChgkkqkRB59scJE-2D3D-5FiCr-5FIOPUpQ992rdPIkm-2D2FJ4tOMBF7cT-2D2B2mjLO6coKWJ3Ndno8VHfslbQGOi5tAC2BOej4yxidNvHntLAI5xmA44o9-2D2BqgE9zoLohOTlh3dVebWvalyy7byCs7jBOhXZZr8rqOrU0dzD1QalbQsfQyBapFKRuA4L6zEpTerJ5s5zoDpi3B3eKmrBQs4TEzhDimFaGpgLxQhzFICtMprMmLlzaQjNw-2D3D-2D3D&d=DwIDaQ&c=xIPCXuHzMdaH2Flc1sgyicYpGQbQbU9KDEmgNF3\\_wl0&r=fZ-BuiFtFug27X\\_5grtgznXYMUfdc1VYGmqrWgfMTVo&m=xCQGxmjdIUAI35PWtX6bad\\_uqbYmqPKA0M\\_w3H6t2FAf-gWhS-kfhx\\_yRnDnj9&s=AYnPy9c9\\_p1ddh6ujYKcdgl4wiOrX3DvizjNc9zsQ7o&e=](https://urldefense.proofpoint.com/v2/url?u=http-3A__url5121.crcl.org_ls_click-3Fupn-3Dx3fBoDjLoK7Tcxhnw1aZtIXLYmSBmCb3I74hTavpXZ987pQfQfgK2AHxzaX3ShlQKlGnx7Z3QqTZsAR9PKm-2D2F0Y7c-2D2FeknChgkkqkRB59scJE-2D3D-5FiCr-5FIOPUpQ992rdPIkm-2D2FJ4tOMBF7cT-2D2B2mjLO6coKWJ3Ndno8VHfslbQGOi5tAC2BOej4yxidNvHntLAI5xmA44o9-2D2BqgE9zoLohOTlh3dVebWvalyy7byCs7jBOhXZZr8rqOrU0dzD1QalbQsfQyBapFKRuA4L6zEpTerJ5s5zoDpi3B3eKmrBQs4TEzhDimFaGpgLxQhzFICtMprMmLlzaQjNw-2D3D-2D3D&d=DwIDaQ&c=xIPCXuHzMdaH2Flc1sgyicYpGQbQbU9KDEmgNF3_wl0&r=fZ-BuiFtFug27X_5grtgznXYMUfdc1VYGmqrWgfMTVo&m=xCQGxmjdIUAI35PWtX6bad_uqbYmqPKA0M_w3H6t2FAf-gWhS-kfhx_yRnDnj9&s=AYnPy9c9_p1ddh6ujYKcdgl4wiOrX3DvizjNc9zsQ7o&e=)

Thank you

## CPRA Master Plan

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**From:** Mr. Caleb Izdepski <noreply@crcl.org>  
**Sent:** Monday, February 27, 2023 6:53 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Mr. Caleb Izdepski

I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan.

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## CPRA Master Plan

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**From:** King Milling <noreply@crcl.org>  
**Sent:** Tuesday, February 28, 2023 7:19 AM  
**To:** CPRA Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

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## CPRA Master Plan

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**From:** Kenneth Teague  
**Sent:** Thursday, March 2, 2023 10:07 AM  
**To:** CPRA Master Plan; Stuart Brown  
**Cc:**  
**Subject:** Comments on 2023 Draft Louisiana's Comprehensive Master Plan for a Sustainable Coast  
Teague comments.pdf  
**Attachments:**

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

My comments are attached.

Ken Teague

March 2, 2023

Coastal Protection & Restoration Authority  
Master Plan Public Comments  
150 Terrace Avenue  
Baton Rouge LA 70802

Dear Sir/Ms.: I have reviewed the 2023 DRAFT Coastal Master Plan, and I have the following comments:

- Qualifying statements
  - The current plan is similar to its predecessors, and thus whatever shortcomings it has, previous versions of the Coastal Master Plan also had them, and probably more. However, for personal reasons, this is the first chance I have had to review and comment on any of the versions of the Louisiana Coastal Master Plan. As such, my comments may constitute "a late hit", which is often roundly criticized in the government and regulatory community. Better late than never, I say.
  - In addition, I was unable to carefully review the entire Master Plan and all supporting documents. So, it is very possible that some of my assertions may not be accurate, simply because I may have missed some of the information in the document. If that turns out to be the case, I apologize.
- The Master Plan places a very high value on creating marsh using dredged material, as the dominant approach to Louisiana coastal restoration. This is misguided.
  - First, it does not directly respond to the fundamental cause of Louisiana coastal wetland collapse, nor does it mimic the processes that created and sustained the Mississippi River Delta. It also does not respond appropriately to the actual causes of wetland loss in the Chenier Plain, which are largely due to the effects of the Calcasieu Ship Channel, but also possibly due to historic misguided efforts- specifically wetland impoundment.
  - Second, the Master Plan, and virtually all Louisiana coastal restoration efforts, ignore the high likelihood of negative impacts due to the dredging of a large number of very large and deep holes in what are naturally shallow bays and coastal lakes. Nobody has bothered to even question whether there might be negative impacts from doing this, particularly on a large scale. Cumulative impacts are a serious concern, in my opinion. Many of these dredge pits will almost certainly result in low dissolved oxygen in bottom waters during the summer. In addition, for the most part, past, present, and future proposed marsh creation projects have completely ignored the possibility that some of the dredged material proposed to be used for marsh creation may be contaminated. This dredged material should be tested. The fact that it is not is shocking.

- The plan fails to clearly articulate the fundamental underlying reasons why Louisiana coastal wetlands are collapsing, and fails to propose appropriate responses in some cases:
  - The historic elimination of the connection between the Mississippi River and its Delta.
    - The enormous importance of reconnecting the Mississippi River to the Delta is not properly emphasized. This importance is well-documented in the scientific literature, and should be common sense. In addition, it is unclear whether the few proposed projects that are relevant to this critical concept, which ARE in the plan, are sufficient given the scale of the problem. Nonetheless, I recognize how difficult it has been for the state to gain approval for the few attempts to reconnect the river to its delta. Those who have worked hard to gain this approval are to be commended. Nonetheless, the fact there are so few such proposals in the plan, and how strong the opposition to doing this actually is, does not bode well for the future, and constitutes a major weakness of this plan.
  - Extreme human alteration of the limited natural connectivity of several coastal basins with the Gulf of Mexico, and of the coastal basins with each other, due to navigation channels.
    - This has resulted in dramatically increased salinity inland, and greater hydrologic exchanges between estuaries and the Gulf, and between wetlands and estuaries. This has been a huge problem for the Breton Sound and Lake Pontchartrain Basins, due to the MRGO (historically; effects recently partially mitigated); the Calcasieu and Sabine Basins, due to the Calcasieu Ship Channel and the Sabine-Neches Navigation Channel; and for the Terrebonne Basin, due to the Houma Navigation Channel.
    - Finally, the GIWW has greatly increased connectivity between adjacent coastal basins, also causing increased salinity in some cases, and increased hydrologic exchanges.
    - Mitigating the enormous negative effects of deep draft navigation channels and the Gulf Intracoastal Waterway, on coastal Louisiana, is extremely difficult and has not been addressed in the Master Plan at a scale that would significantly address the problems. I don't have the answers, but the subject certainly warrants much more attention than it has gotten. While it is certainly a very difficult scientific and engineering problem, it doesn't help that there is almost certainly a major lack of political will to address this, due to potential impacts to navigation.
- The dense web of oil and gas canals throughout coastal Louisiana.
  - These fundamentally alter coastal/wetland hydrology, at multiple spatial scales. They increase hydrologic exchanges and in many cases, salinity, in the general vicinity of wetlands. However, spoil banks may limit connectivity between canal waters and wetlands. This effect of spoil banks is often cited as a reason not to backfill them, though this is surely incorrect. Unfortunately spoil banks can alter wetland hydrology, resulting in impoundment or semi-impoundment of wetlands, which may increase wetland loss rates.

- One of the major flaws of the Master Plan is the complete avoidance of even a mention of oil and gas canal backfilling as a viable coastal restoration approach, much less disclosing how important this approach should be, and how cost-effective it is. Clearly, the only reason the Master Plan is silent on this subject is the extreme political opposition to it. Oil and gas interests are violently opposed to it, presumably because it would make potential future oil and gas exploration and production more difficult and expensive. Once, prior to 2013, a major oil and gas company actually directed the U.S. Environmental Protection Agency, in writing, to cease and desist from exploring the potential for further backfilling of oil and gas canals in Jean Lafitte National Park, by the CWPPRA program. Take note- a major oil and gas company actually threatened the Federal government in writing, seeking to stop them from further considering backfilling of oil and gas canals on Federal property.
- The other likely reason the Master Plan is silent on canal backfilling, is because local people like the convenience of using them as aquatic highways, facilitating transport by boat through the wetlands. But this is not a good argument for avoiding addressing a major contributor to coastal wetland ecosystem collapse. Either you are serious about addressing coastal annihilation, or you are not. If the State of Louisiana wants the public to believe they are serious about coastal protection and restoration, it will reverse its policy of ignoring the importance of oil and gas canals as a cause of coastal wetland collapse, and begin undertaking canal backfilling on a very large scale, immediately.
- Climate change and sea level rise. Rising global temperatures are increasing water surface elevations globally, including in coastal Louisiana, resulting in increasing submergence of wetlands, making it even more important for the Mississippi River to provide sediments to wetlands, and increasing the importance of true hydrologic restoration as a means of restoring accretionary processes. In addition, climate change is causing more and stronger tropical storms. While coastal Louisiana developed with tropical storms occurring historically, the frequency and magnitude of these storms may not have been what they are today, or what they may be in the future.
- Effects of shallow subsurface fluid (oil, natural gas) withdrawal, resulting in faulting. This in turn resulted in loss of wetland elevation, in turn resulting in greatly increased wetland flooding- in certain areas with intensive historic oil and gas withdrawal. This cause of Louisiana coastal wetland loss is rarely acknowledged. While the implications for coastal restoration are unclear to me, at a minimum it suggests that the oil and gas industry clearly is partly to blame for coastal collapse. It is critical that the State of Louisiana acknowledge this, and ensure that future oil and gas activities in the coastal zone do not have this effect. It also has some implications for whether it makes sense to undertake restoration in areas that are actively faulting, and implications for appropriate funding sources for restoration.

- The potential role of intentional impoundment of coastal wetlands. The Master Plan talks a lot about excessive water levels in the Chenier Plain, but amazingly, it seems to avoid acknowledging the possibility that these excessive water levels may be caused by the extensive impoundment there. I would not be surprised if the science is still not sufficient to conclude this is the case, but I doubt adequate scientific explanations attributable to other potential causes exists either, and there are certainly reasons to be suspicious regarding the hydrologic effects of extensive coastal wetland impoundment.
  - Of course there are other causes of coastal wetland collapse in Louisiana, but these are the major ones, in my opinion.
- The relatively high importance of barrier island/barrier shoreline restoration and protection- by artificially subsidizing the sand budgets of these islands- is not sufficiently emphasized, though the projects that would achieve this may actually be in the plan. This is well-documented in the scientific literature, and in historic special studies.
  - The idea of "ridge restoration" gained traction in the Louisiana coastal restoration community after Hurricane Katrina, and becomes more popular every year it seems. However, any attempt to identify scientific support for the idea will come up lacking. While it is possible that directed scientific attention to the idea will eventually result in scientific support for it, there is currently virtually no documentation of scientific support for this being an important approach to restoring coastal Louisiana. The emphasis on it in the Master Plan and in other Louisiana coastal restoration programs is either premature, or misguided.
  - The concept of "land bridge" has gained traction within the Louisiana coastal restoration community since Gagliano coined the term long ago, and especially since the Bayou Dupont marsh creation project was undertaken. While others asserted that this project was important as the first step in restoration of a "land bridge", the Federal sponsors did not envision this as a purpose of the project, at least not prior to 2013. Gagliano specifically applied the term to the wetlands connecting the west bank of the Mississippi River and the north shore of Lake Pontchartrain in the vicinity of Slidell. These wetlands also formed the eastern boundary of Lake Pontchartrain, and the western boundary of Lake Borgne. Now, some seem to use the term extremely liberally, to justify nearly any proposed marsh creation project that connects two existing marshes, implying the proposed project has some vaguely-articulated but very important higher function. I assert such suggestions are nearly meaningless. If you really believe the idea has scientific merit, formally task the appropriate scientific experts with better defining the terminology and how it can legitimately be used to add further justification to proposed projects (if it can). The emphasis placed on the idea by the Master Plan is either premature, or misguided.



In summary, while many repeatedly applaud Louisiana's Master Plan efforts, I find them biased and lacking. I encourage the State of Louisiana to do better by addressing the issues I have raised here. However, I do want to applaud the State for continuing to pursue the important mid-Barataria Sediment Diversion project, despite fierce opposition.

In the event that there are questions whether some guy in Texas is qualified to make such comments, please note: I was educated in coastal and wetland ecology at one of the best university departments devoted to coastal science, in the country- what was then LSU's Marine Sciences Department, the Center for Wetland Resources, including the Coastal Ecology Laboratory. I learned about coastal Louisiana from some of the best minds that ever thought about it. And I spent many years working on it professionally.

Sincerely,  
Kenneth G. Teague, PWS (emeritus), Senior Certified Ecologist  
Austin, Texas

## CPRA Master Plan

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**From:** Ms. Lynn Wilbur <noreply@crcl.org>  
**Sent:** Sunday, March 5, 2023 12:04 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Lynn Wilbur

I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan.

Coastal land loss is one of the most significant and urgent issues facing our state. As such, restoration projects must be implemented as soon as possible. With every minute lost, we are losing ground. Our state must act to advance an equitable, safer and flourishing coast for Louisiana's communities, ecosystems and economy.

Louisiana has made significant progress in implementing restoration projects across the coast. We must continue. To ensure a better future for our state, we must move forward to build and sustain the Mississippi River Delta. Because they can make the most impact over time and support other investments made in restoration and risk-reduction projects, I believe the state should focus funding on large-scale projects first.

I strongly support the draft Coastal Master Plan. I am encouraged to see that it includes implementation periods that prioritize how projects should be advanced over time. I also support the Master Plan process, as it is publicly informed and grounded in the best available science. It also balances coastal restoration with protection and is realistic about the challenges we face along our coast. This process should serve as a model for how to involve experts, residents and other stakeholders in the decisions, and the foundation in science is of critical importance.

I encourage the state to continue to find opportunities to reach wider audiences. I also encourage CPRA to continue to find new and accessible ways to include all stakeholders in the process. The Master Plan Viewer is a welcome tool for communicating with people about projects in their own backyards.

Thank you

## CPRA Master Plan

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**From:** Mr. ALVIN DUVERNAY III <noreply@crcl.org>  
**Sent:** Sunday, March 5, 2023 2:46 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Mr. ALVIN DUVERNAY III

These are my public comments on the 2023 Coastal Master Plan.

I've observed and intimately lived with the changes to coastal La for two thirds of a century. As an outdoor fanatic and a geoscientist, I must declare that the, mostly anthropogenic, land loss and ecologic destruction is and has been alarming. As such, I couldn't have been more excited when the CPRA was formed and the first Master Plan rolled out after Katrina. I read the plan and reveled in the clear path forward. It articulated what must be done, how to do it and of course the cost. At the time, it looked to me that it was possible to get ahead of the problem. The plan was solid.

Over the years my excitement morphed into frustration by the pace of implementation. The need for intervention and action was obvious and demonstrable; the advocacy from scientists and stakeholders was abundant. Equally abundant was the lack of urgency, political will and funding from policy makers and obstruction from special interests which has impaired the sense of urgency and timely progress. Enough already! Our state must act boldly and with resolve to advance an equitable, safe and flourishing coast for Louisiana's communities, ecosystems and economy.

The current plan is impressive as were the previous three. It adheres to fundamental scientific method; utilizes cogent modeling, iterations and metrics; and employs multiple, realistic what-if scenarios. The plan thoroughly factors in industry, recreation, and communities (indigenous and non). This is indeed what science should look like and I support it completely.

In the last several years my frustration over the pace of implementation has begun to morph back into excitement as I've seen more movement and progress in restoration activity. We have truly made significant progress in implementing restoration projects across the coast.

I've worked with CRCL and other restoration groups as a volunteer for over fifteen years. I've lived, worked and played in coastal La for over seventy. I've seen the ecologic destruction due to our activities and/or neglect. Likewise, I've seen the benefits from restoration projects. I believe that restoration should be our top priority – above politics, above fishing, above culture and heritage, economy, energy extraction, transportation, etc. Again, our state must act boldly and with resolve to advance an equitable, safe and flourishing coast for Louisiana's communities, ecosystems and economy. If not, all of the above is moot and/or will cease to exist.

I'll end with one example of my personal experience with the coastal issues facing us. It is a true story of degradation and subsequent rejuvenation. Hopefully, this illustrates the importance that the success of this plan is to me and more importantly, the power we have to repair our mistakes when given the opportunity and the will to act.

In 1972 I built a camp with my best friend in the upper Barataria Basin near Lake Salvador just South of the current Davis Pond diversion. The 70's were my college and early professional life years where I learned my trade as a sedimentary

geologist and paleontologist. It was then that I became aware and intimate with the mechanics of our ecosystems. It was then that I learned of the methodical and unrelenting demise of our coastal environment; of the merciless disappearance of marshlands and islands; of the steady encroachment of salt water. Over the years I observed the relentless mutation of our camp area around Bayou Des Allemandes from a near pristine freshwater environment to one of more saltwater influence and less marshland. Where we used to exclusively catch freshwater species (Bass, Bream and Freshwater Cats), we started catching more saltwater species (Specs, Reds, Hardhead Cats). The ecologic and environmental transfiguration was stark. Even the bugs changed. For the worst.

Then in the early 2000's the Davis Pond freshwater diversion started operating. I'd followed its progress from design through implementation. I'd studied the models and was very hopeful yet not optimistic that I would ever live to see any significant positive impact. I was wrong. Less than two decades later the environment, including the fauna and flora, are as I remember when I first explored and played in the area as a teenager. In my lifetime, Bream and Bass and Catfishing has never been better.

I recently toured the Davis Pond area. I walked on flotant marsh and hard ground willow tree forest that just a few years ago was open water. That one project restored, created and sustained land and reversed the certain demise of an entire ecosystem. It's working beyond my wildest dreams.

The 2023 Coastal Master Plan is a gem. Work it. Sell it. Fund it. Advocate everywhere. The clock is ticking so try to prioritize the large-scale projects. Fast track the small ones. And every little chance you get – HURRY UP!

## CPRA Master Plan

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**From:** Camille Strachan  
**Sent:** Monday, March 6, 2023 1:08 PM  
**To:** CPRA Master Plan  
**Cc:** Weasy BLODGETT; Sebastian Bland; Spoon Dickey; spoon dickey; Jody Hotchkiss; Andrew Hovet; Walter Keenan; Hannah Lissette; Vanna Forsyth McDonald; HANNAH WHITNEY  
**Subject:** Public Comment 2023 Coastal Master Plan

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Dear Coastal Protection and Restoration Authority:

The Bradish Johnson Co, Limited, (BJCo) is the owner of approximately 10,000 acres of marsh to the west of the Mississippi near West Pointe ala Hache. Its holdings are generally bounded by Grand Bayou on the east and Bayou Grande Cheniere on the west. As the manager of this property, and on behalf of its board of directors, I am writing to commend CPRA for its past work, its leadership in developing the master planning process, and its production of the 2023 Draft.

Here are come comments and questions for your consideration:

### **I. Comments:**

A. Given the nature of BJCo's holdings, the board is particularly interested in Ridge and Marsh Remediation Projects, both for their individual benefits to marsh remediation and as part of strategic plans to diminish storm surge flooding as laid out in the Introduction to the Plan on pp 1-16. The CWPPRA-funded BA-42 project (completed in 2015), the NRDA-funded BA-240 (now in progress), CWPPRA's construction funding for BA-217, and BA-257 (funded for E&D) are examples of dual purpose objectives because rebuilt marshes and ridges are the first line of defense against storm surges.

B. We fully support CPRA's focus on a close working relationship with landowners and the efficient use of resources described on p. 7. We appreciate your outreach and the shared interest of other landowners near the BJCo property.

### **II. Questions based on matters of special interest to landowners in the area:**

A. Efficient use of resources. There are areas not mentioned in the draft 2023 Plan that are adjacent to, or very near BA-42, BA-240, BA-217, and BA-257 projects and other projects for which the dredged material delivery systems and construction elements are already in place. Can the 2023 Draft Plan address this circumstance?

B. What about potential projects that are within the draft's mapped areas, but not currently listed in the 2023 Draft Plan? We understand that certain sources of funding are only available to projects "within the master plan". Given the time and resources necessary to do successful projects, how can this be remedied?

We welcome any comments or questions that you may have. Please let me know if you have any questions or need any additional information.

With thanks for your attention,

Camille Strachan  
BJCo General Manager

--

Camille Jones Strachan Attorney, LLC

## CPRA Master Plan

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**From:** St. Mary Excel Community  
**Sent:** Monday, March 6, 2023 3:30 PM  
**To:** CPRA Master Plan  
**Cc:** Catherine Holcomb  
**Subject:** 2023 Draft Coastal Master Plan - Comments  
**Attachments:** 2023 CMP Comments St. Mary Excel.pdf  
  
**Importance:** High

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

St. Mary Excel makes comments on the 2023 Draft Coastal Master Plan

**Please advise of receipt.**

Regards,

Monica L. Mancuso, Ph.D.

Executive Director

St. Mary Excel



Advocating Economic Diversification for Educational and Cultural Advancement

March 6, 2023

St. Mary Excel, a non-profit, in Morgan City, LA submits the following comments for the 2023 Coastal Master Plan.

The 2023 Coastal Master Plan (CMP) would benefit from inclusion of localized, Atchafalaya, programmatic projects taking place to protect the Louisiana (LA) coastline. Although localized, these projects impact the entire coast and need to be supported and funded by inclusion in the 2023 CMP to maximize LA coastal benefit.

The two localized projects, referenced in these comments, embrace what is at risk along the LA coastline; 50% of the nation's refining capacity, 20% of the nation's natural gas supply, 90% of the offshore energy supply, along with ports for shipping grain.

The localized coastline projects below put an empowered human-capital workforce equipped with resources to protect the asset of the LA coast: the most productive estuary south of Alaska.

- Project One: Atchafalaya Resilience Lab at Coastal Morgan City, LA  
"Resilience" was first presented in the CMP in 2007. A Louisiana resilience lab in an accretion-forming, legacy-oil-and-gas community located along the coastline can provide huge benefit to coastal restoration. The Morgan City, LA coastal community has the sentiment of LA's energy production, the stressors and shocks of a coastal community, a 100-year-event levee system, and reflects in micro what restoration efforts aim to provide for LA, a restored and thriving coast.

The lab would extend the monitoring and modeling work taking place in LA research universities and extend the academic work into the impacted area. The coastal lab would provide a presence from which to field-test resilience factors of coastal restoration. The lab would vest proximal researchers within the habitat of the 30% flow of the Mississippi, the Atchafalaya area. These researchers would be located for field testing nature-based solutions to wetland loss. The researchers would be located within the Atchafalaya providing a presence and perspective appropriate to such an impacted CMP impacted area where multi-dimensional simulations of channel hydrodynamics and sediment transport strengthen predictions for Mississippi diversions, coastal restoration, and floodgate decisions.

### *Directors*

Catherine P. Holcomb  
Ruby Maize  
Margaret Metz Theriot  
Alice Pecoraro  
Kelly Lind Boudreaux  
Laura Dozar  
(Emeritus)  
Lucien "Lu" Cutrera  
(Emeritus)  
Lauren V. Hebert  
(Emeritus)  
Gerard Bourgeois  
(Emeritus)

### *Advisory*

Lou Tamporello  
Colleen Askew  
Clarence Robinson  
Peter Boudreaux  
Ambre Wilson  
Courtney "Schola" Long  
Lea Hebert  
Kimberlin McPherson  
Evan Boudreaux  
Vera Judycki  
Leslie Smith  
Rev. Marty Harden  
Lesley Washington  
Cherie Laiche





## Advocating Economic Diversification for Educational and Cultural Advancement

Two examples contribute to inclusion of an Atchafalaya Resilience lab at Coastal Morgan City, LA.

First, resilience lab field-testing adds an additional layer of science and can be justified in a cost-benefit analysis in an accretion forming area contributing evidence for macro expenditures for building the coast in eroding areas.

Secondly, the localized human capital perspective needs increased representation within the CMP. The community of Morgan City, LA is small enough to assess and provide feedback during and after storm and water events.

In addition, much can be tested to determine best practices for community engagement in resilience practices of: building codes and materials, water event responses, cultural impacts and more. As one example, models for the hardening, smartening and greening of the electrical grid within a marsh protected area would be tested in situ to provide great benefit to coastal restoration and re-building practices. This is just one example and numerous possibilities exist when researchers field test within an impacted coastal area.

- **Project Two: Atchafalaya Coastal Science and Maritime High School at Morgan City, LA**

The CMP needs to include a workforce pipeline of coastal stewards through a residential high school. The school would draw students from across LA. Students would be immersed in coastal science and maritime curriculum within the Atchafalaya River/Delta/Basin/Coast. Students would engage with coastal researchers present both at the resilience lab and also at the Atchafalaya National Estuarine Research Reserve. Students would engage in internships appropriate to a working LA coast and they upon high school graduation could continue working within the coast or continue studies within a coastal studies university. The need is that students begin exploration of coastal careers while they are still in high school.

The draft CMP needs to advance beyond vegetative plantings and oyster hatching to coastal human capital development. Inclusion of the two projects, Atchafalaya resilience lab and coastal science high school, need inclusion in the programmatic restoration part of the 2023 CMP. One project would develop



Advocating Economic Diversification for Educational and Cultural Advancement

aspiring coastal workers, and the other project would place those workers most appropriately on impacted coast.

## CPRA Master Plan

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**From:** tpoche7  
**Sent:** Monday, March 13, 2023 9:47 AM  
**To:** CPRA Master Plan  
**Subject:** St.James Parish

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

What are the plans for St. James Parish? With the levees being built in St.John that bring alot more flood water to St. James.

Sent from my Galaxy

## CPRA Master Plan

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**From:** Paul Dittman  
**Sent:** Tuesday, March 14, 2023 9:39 AM  
**To:** CPRA Master Plan  
**Subject:** Public Comment  
**Attachments:** 230314 GICA Comments DRAFT 2023 CPRA Master Plan.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.



Gulf Intracoastal Canal Association

PO Box 2698

Covington, LA 70434

[www.gicaonline.com](http://www.gicaonline.com) · 985-302-6666

March 14, 2023

Coastal Protection & Restoration Authority (CPRA)  
Attention: Master Plan Public Comments  
150 Terrace Avenue  
Baton Rouge LA 70802

**Subj: DRAFT 2023 Coastal Master Plan Comments**

Dear Sir or Madam:

Thank you for the opportunity to comment on Louisiana's 2023 Draft Coastal Master Plan. GICA is a 118-year-old trade association representing over 160 member companies involved in towboat and barge operations, shipping, shipyards and associated maritime industries which use the 1300 miles of Gulf Intracoastal Waterway (GIWW) between Brownsville, Texas and St. Marks, Florida. GICA is committed to facilitating commerce through ensuring safe, reliable and efficient Gulf Coast waterways.

The GIWW is the third busiest inland waterway in the nation for tonnage handled after the Mississippi River and Ohio River. However, for cargo value, it ranks as one of the highest nationally. The GIWW provides the connective tissue linking our **nation's** petrochemical epicenters in southwest Louisiana and Texas with the rest of the country through direct access to the Mississippi River system. Any structures placed along the GIWW, and any modification to the navigable channel's configuration, must be managed in close consultation with the maritime industry. Early and effective communication is essential to ensure any proposed changes will not disrupt or endanger commercial navigation which could result in **national level supply chain disruptions**. In addition, the GIWW is critical to Louisiana's economy, each year facilitating over 70 million of tons of petrochemical, oil, finished products and other commodities through the state to, and from, key markets.

Recognizing the importance of a working coast throughout all CPRA planning phases contributes significantly to ensuring long term economic viability for many industries doing business in Louisiana. Quite simply, without a sustainable coast, there is no GIWW. Generally, GICA recognizes and agrees that the state's land loss problems

will need a comprehensive array of restoration projects and supports barrier island building, marsh creation, hydrologic and ridge restoration, shoreline protection, and oyster reef restoration.

As with the 2017 Master Plan, our review of the 2023 Draft Master Plan resulted in no specific objections to the suite of projects outlined in the plan. **However, any proposed diversion projects impacting routine water flow on the GIWW and any proposed structures restricting the channel or forming a closure on a navigable waterway should be coordinated with GICA from the outset of the design and permitting process to identify and manage any potential navigation safety concerns.**

Additionally, GICA requests to be included in all future discussions and plan development for the following specific projects noted in the DRAFT 2023 Coastal Master Plan:

1. Lafitte Ring Levee Project (ID# 083)
2. Iberia/St. Mary Upland Levee (ID# 150)
3. Atchafalaya Diversion (ID# 362)
4. Morganza to the Gulf (ID# 110B)
5. Slidell Ring Levees (ID# 032)
6. Abbeville and Vicinity (ID# 292)
7. Amelia Levee Improvements (ID#144)
8. Upper Barataria Risk Reduction (ID# 082)

All these projects either **directly impact the GIWW** or include the installation of “barge gates” of varying sizes on what appear to be ancillary and/or connecting waterways to the GIWW. Early coordination with GICA during the planning and design of these projects is critical to ensure any possible impacts to marine transportation are identified and appropriate mitigations taken to ensure continued safe navigation and maritime transportation efficiencies. Planners are strongly urged to carefully consider gate sizing, operations, and locations to minimize navigation restrictions.

GICA appreciates Louisiana’s comprehensive approach to coastal restoration and looks forward to supporting CPRA’s efforts in the future.

Sincerely,

**Paul Dittman**  
President  
Gulf Intracoastal Canal Association

**Paul Dittman**

President

Gulf Intracoastal Canal Association

PO Box 2698

Covington, LA 70434

985.302.6666

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



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March 14, 2023

Coastal Protection & Restoration Authority (CPRA)

Attention: Master Plan Public Comments

150 Terrace Avenue

Baton Rouge LA 70802

**Subj: DRAFT 2023 Coastal Master Plan Comments**

Dear Sir or Madam:

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Recognizing the importance of a working coast throughout all CPRA planning phases contributes significantly to ensuring long term economic viability for many industries doing business in Louisiana. Quite simply, without a sustainable coast, there is no GIWW. Generally, GICA recognizes and agrees that the state's land loss problems will need a comprehensive array of restoration projects and supports barrier island building, marsh creation, hydrologic and ridge restoration, shoreline protection, and oyster reef restoration.



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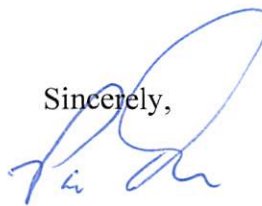
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GICA appreciates Louisiana’s comprehensive approach to coastal restoration and looks forward to supporting CPRA’s efforts in the future.

Sincerely,



**Paul Dittman**

President

Gulf Intracoastal Canal Association



## CPRA Master Plan

---

**From:** Cindy Cutrera. Port of Morgan City  
**Sent:** Friday, March 17, 2023 12:06 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment  
**Attachments:** 2023 coastal master plan comments final.docx

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Please find attached comments on the 2023 Coastal Master Plan being submitted by the Port of Morgan City.

*Cindy Cutrera, IMPE, CLED*  
Economic Development Manager  
Port of Morgan City  
7327 Highway 182 - Office  
800 Youngs Road - Port Terminal  
P. O. Box 1460, Morgan City, LA 70381  
Office 985-384-0850, Ext. 114 . Fax 985-385-1931



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



**MORGAN CITY HARBOR AND TERMINAL DISTRICT**

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TELEPHONE (985) 384-0850 • FAX (985) 385-1931

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March 17, 2023

La Coastal Protection & Restoration Authority

Port of Morgan City Comments : 2023 Coastal Master Plan

The Port of Morgan City would like to congratulate The Louisiana Coastal Protection and Restoration Authority for your many coastal protection and restoration achievements and to thank you for your support for flood protection and recreation in St. Mary Parish.

As land continues to build on the Atchafalaya River, we recognize that surrounding areas or not as fortunate. We recognize that if areas east and west of us are not protected and/or restored, we also become more vulnerable to tropical storms and hurricanes. We also recognize the Atchafalaya River can be a solution to our neighbors' land loss, but not to the detriment of industry and the economy of East St. Mary Parish.

Many concerns have been expressed by local stakeholders and waterway users who navigate through our Port district regarding Project 139b (Increase Atchafalaya Flow to Terrebonne) (TE-110) which is currently being engineered by CPRA. We recognize that modeling is progressing to address the concerns that have been expressed, but the list is lengthy.

The following is a summary of some of these concerns:

- The potential for inordinate currents when the structure north of the lock is opened drawing tows into the protection cells adjacent to the structure when coming east from the Atchafalaya River

---

*President Peter Orlando*

*Vice-President Ben Adams*

*Treasurer Deborah Garber*

*Secretary Steven Cornes*

Commissioners: • **Joseph Cain** • **Adam Mayon** • **Troy Lombardo** • **Matthew Glover** • **Matthew Tycer**

**Raymond "Mac" Wade, CPE**  
Executive Director

- Effects of currents in context with higher winds, impaired visibility and channel alignment
- Impacts created by eddies forming in the vicinity of the Bayou Boeuf Lock
- The inability of tows to be able to push in and stage on either side of the lock
- Flow (velocity) created north of the lock will turn the slack water channel into a flowing waterway and will severely impact facilities which off and onload vessels for offshore (Experienced boat captains have indicated that an increase as little as one knot will impact navigation and dock activities.)
- Flow created north of the lock in the slack water channel that may result in siltation impacting shipyard operations
- Possible destabilization of bulkheads along the project area, especially with additional dredging depths being proposed by the project
- Once dredged will the GIWW be maintained at a -20 to -25 feet? While the GIWW is authorized at -12', much of the industrial area on the GIWW is at or near -20'. If that depth is lost due to sedimentation, will CPRA be responsible for removing excess sediment?
- Operation impacts for Ferry to Avoca Island
- Concerns about protection piles blocking the public boat launch (Will the boat launch still be available?)
- Impacts to Hugh & Byrnes Young Marine Facility (SLCC-Young Memorial) diving program
- Increased Sedimentation on the GIWW, and in the Atchafalaya Bar Channel, on Bayou Chene, or from the Chene to the Lower Atchafalaya Bay (Is adequate modeling being performed for the entire area? Modeling below Crewboat Cut should be done as this is where sedimentation normally occurs; modeling should be included below Crewboat Cut to indicate whether or not sediment accumulation would be exacerbated.)
- Changes in velocity or potential for sedimentation on the Atchafalaya River from the GIWW at Berwick to the Gulf of Mexico (Is adequate modeling being performed for the entire area? The Atchafalaya River at the GIWW in

Berwick to Crewboat Cut is not part of the Federally authorized Atchafalaya River and Bayous Black, Boeuf and Chene which means that authorized funding would not be available should sedimentation occur in that area. Therefore, careful and thorough modeling should be performed for that area.)

During a Stakeholder Meeting held at the Port of Morgan City offices in Morgan City, LA on March 2, 2023, attendees (CPRA, Gulf Intracoastal Canal Association, U. S. Coast Guard, St. Mary Levee District, the Port of Morgan City, St. Mary Parish Government, Terrebonne Parish Government, navigation interests, and local facility operators) heard from leaders from Terrebonne Parish that they are not in favor of TE-110 as they are concerned that the muddy waters of the Atchafalaya River will impact the pristine black water of Terrebonne Parish marshes.

In our capacity as the Port Authority and the non-federal sponsor of the Atchafalaya River and Bayous Boeuf, Black and Chene Federally Authorized Project, and being aware that the parish this project was designed to help is not in favor of the project, we have the responsibility of pointing out that we fail to see the benefit to the economy of St. Mary Parish while a serious concern exists for the ability to safely navigate the waterways.

This is the only diversion in the Master Plan that is being planned to go directly through a very significant industrial area which causes business interruption concerns both during construction and during operation once the structure is completed.

Local fabrication and shipyards, many located along the proposed project area, support wind and alternative energy operations and liquified natural gas operations. They provide for our national defense and support our country as a national economic power. They have made significant investments in their facilities and have grown jobs that support new construction, repair, and

conversions for all types of government marine vessels, dredges and drydocks through the award of contracts that support the U. S. Department of Defense and the U. S. Department of Homeland Security.

We understand that cost-benefit calculations are derived using the cost of a project and the value of land created, or fresh water diverted, and that once the benefit is calculated, other factors such as how business operations are affected will be considered. We ask that any detriment to industry be closely reviewed as a part of the TE-110 evaluation process.

As stated earlier, we recognize the Atchafalaya River can be a solution to land loss; however, we encourage CPRA to explore other options besides Project 139b (TE-110) to deliver fresh water to the appropriate areas and/or to take advantage of beneficial use of Atchafalaya River sediment.

The 2023 Draft Coastal Master Plan offers the Atchafalaya River Diversion Project ID: 108 as a potential alternative to TE-110. However, there is not enough information on this option for the Port to provide an opinion at this time. However, it appears there could be navigational concerns with this project as well if additional flow is pushed across Bayou Chene. It should be noted that Bayou Chene is the industrial route to the Gulf of Mexico and is also used as an alternate route for the Bayou Boeuf Locks during emergency situations.

Other possible options, or perhaps a combination of options, have been discussed that could fulfill CPRA's commitment to the coast by providing flood protection, harnessing our natural resources, providing coastal habitats, and sustaining our unique cultural heritage, while still promoting a viable working coast to support regionally and nationally important businesses and industries.

We believe the Lake Verret and the Bayou Chene to Bayou Penchant areas and the Atchafalaya River Below Crewboat Cut could provide solutions through a possible combination of large and small projects such as:

- Diverting fresh water to Eastern Terrebonne from Lake Verret (The water out of the Verrett Basin is not sediment laden and wouldn't interfere with the black waters of Terrebonne Parish.)
- Widening/deepening of Bayou Copasaw and Minors Canal, with controls for salinity if it occurs, along with the construction of Western Terrebonne Hydrologic Restoration Project ID #342 (in the 2023 Master Plan) at an estimated cost of \$22 million (This is a hydrologic restoration project to reconnect freshwater flows from Bayou Penchant to southern Terrebonne marshes by re-establishing flow through Bayou Carencro.)
- Considering an Atchafalaya River Sediment Diversion to Eastern Terrebonne from the Crewboat Cut area utilizing a prior concept proposed by Terrebonne Parish Government of a sediment pipeline delivery to sediment starved areas
- Utilizing the Bayou Chene Flood Control Structure as a diversion structure by installing a lock system in conjunction with the flood control structure similar to the \*HNC Lock and Bubba Dove Floodgate. With the ability to leave the Flood Control Structure on Bayou Chene closed for a longer period backwater flooding issues would be prevented, the Verrett Basin would be allowed to drain out to the GIWW and Eastern Terrebonne Parish without forcing additional Atchafalaya River water in that direction, southern to southeastern Terrebonne could benefit from the fresh Atchafalaya River water and sediment, and a longer window for navigation and business continuation would be possible.

*\*“ The HNC Lock will allow a longer window of opportunity for navigation activities when the adjacent Bubba Dove Floodgate is closed to protect communities from storm surge or high water events. During gate closures, the lock will allow vessels to travel in either direction on the HNC, enabling officials to close the floodgate earlier and keep it closed longer, benefiting the area’s ecosystem suffering from saltwater intrusion.” Source: CPRA*

Furthermore, we understand that Terrebonne Parish has constructed, or is planning to construct, pump stations that will move fresh water from north to south. We encourage CPRA to include these pump stations in their modeling.

In closing, we appreciate CPRA's participation in both private and public stakeholder meetings. We would like to stress the importance of local input and urge CPRA to continue to collaborate with local stakeholders who recognize both the benefits and the disadvantages of a proposed project in the places they live, work and play.

Sincerely,

Raymond M. "Mac" Wade  
Executive Director  
Port of Morgan City

## CPRA Master Plan

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**From:** kl.walter  
**Sent:** Monday, March 20, 2023 12:13 PM  
**To:** CPRA Master Plan  
**Subject:** Paper for Louisiana Conference Transaction Publication on Surfactants to Prevent Storm Surge  
**Attachments:** Use of Surfactants to Reduce Hurricane Storm Surge - 3-20-23.pdf

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**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

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CPRA Authors:

The attached .pdf document is our contribution as a comment to the draft document *2023 Draft Coastal Master Plan* authored by the Louisiana Coastal Protection and Restoration Authority (CPRA).

We are proposing considering adding an environmentally friendly surfactant to the sea water near the coastline at the predicted hurricane landfall location. This is expected to reduce the water's surface tension and lead to a reduction in the height of the storm surge waves. The first step would be to add surface tension as a parameter to existing computer models that predict storm surge height. If results of this modeling look promising, other steps outlined in the attachment can be carried out to determine the practicality and costs of adding such surfactant to coastal waters just before a hurricane's landfall. These costs can be weighed against estimated costs for coastal storm surge damage, both with the currently existing protection and with added costs of other proposed storm surge improvements (e.g., new or higher sea walls and levees, flood gates, etc.).

We have applied for a patent to use surfactants in this way, and are willing to allow its use at no cost to any university, government agency or company that undertakes the suggested computer modeling.

Thanks for allowing such additional suggestions from interested parties.

Should you have any questions or need more information, please contact us.

Sincerely,

John B. Huber

Kenneth L. Walter, Ph.D.

Sent from [Mail](#) for Windows



## PROPOSAL TO EXAMINE SURFACTANT ADDITION AS A MEANS OF REDUCING HURRICANE STORM SURGE

by John B. Huber and Kenneth L. Walter, Ph.D. (3-20-23)

*Louisiana's Comprehensive Master Plan for a Sustainable Coast*, Draft, 2023 4<sup>th</sup> Edition, details several methods for reducing the impact of hurricane storm surge on coastal areas. These consist primarily of building (or raising the height of existing) seawalls and levees and pumping out water that overtops them or leaks through them. With the exception of closing floodgates, there appears to be no method in use to mitigate the effects of hurricane storm surge at the time and place where a hurricane is approaching.

We are suggesting that adding surfactant to sea water near the coastline on the projected hurricane path is a method that is worthwhile investigating. If surfactant is added to sea water, the lower resulting surface tension should lower the wave height compared to what it would otherwise be. This means that waves approaching the physical barriers in place (seawalls, gates, levees, etc.) might not overtop them, or overtop them with a significantly reduced sea water flow.

Computer models already exist that predict the coastal wave height as a function of known hurricane properties (wind speed, forward motion speed, water surface temperature, tides, and slopes of coastal distance vs. water depth). Adding the property of the sea water's surface tension to the model could be done to modify the wave height prediction. The initial goal would be to see how much the sea water's surface tension would have to be reduced so that a significant benefit could be achieved. Two important secondary goals are to estimate both the length of coastline that needs protecting and the distance out to sea perpendicular to the coastline that the surface tension must be reduced. A third secondary goal for the computer model is to predict how fast wave and current mixing will reduce the concentration of surfactant over time after it has been applied at or near the surface.

Once the effective range of surface tension has been established, it becomes an engineering design problem as to how to reduce the surface tension into this range and keep it there for a sufficiently long time to be effective. The next step would be to experimentally determine in a laboratory the functional relationships between sea water surface tension and both surfactant concentration (in parts per million) and the sea water surface temperature. When the above work has been completed, we can make an estimate for how much volume of surfactant will be needed for a given hurricane and landfall location. This may be in the neighborhood of 10's of millions of gallons.

Then the problem becomes how this surfactant is to be spread and maintained over the required sea water surface area. Consideration should be given to distribution from fixed offshore platforms housing surfactant storage tanks if mixing by wave action is quickly attained at relatively shallow depths. Distribution from surface vessels and/or aircraft may be required in addition to, or instead of, fixed platforms. These latter assets must be deployed about one or two days prior to the hurricane reaching the coastal vicinity depending on the hurricane forward speed, the water surface area to be covered, and the number of vessels/planes employed.

The total capital and operating costs including assets utilized short term (e.g., surfactant-distribution vessels, planes, manpower) and long term (e.g., initial cost of surfactant, storage facilities, piping, offshore platforms, maintenance) must be estimated per storm. These costs would then be compared

to the estimated costs of storm surge damage for two cases – one case with no improvements and another with higher sea walls, levees, flood gates, etc.

Two other important items are yet to be considered. One is that the surfactant used must be “environmentally friendly.” This means that it must be essentially non-toxic to sea flora and fauna both in the water and on land or marshes near the coastline. There would have to be an extensive environmental testing program to prove that this is true.

A second item is that the chosen surfactant must be capable of effective operation in both salt water and the relatively cool sea water temperatures. Most surfactants are currently used in the detergents sold for washing clothes and dishes, where fresh water and relatively hotter temperatures prevail. However, there is work going on to develop such surfactants. The storage “shelf life” of such surfactants must also be estimated.

The authors of this paper have applied for a patent relative to using surfactants to minimize storm surges during hurricanes. We are willing to license what, if any, patent rights that might accrue at no cost to any university, government agency or company capable of running and modifying the computer models discussed above.

## CPRA Master Plan

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**From:** Megan C. Dufrene  
**Sent:** Tuesday, March 21, 2023 8:23 AM  
**To:** CPRA Master Plan  
**Subject:** Public Comment  
**Attachments:** CPRA FY 2023 Master Plan Comment Letter- Lafourche Parish.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Good Morning,

Attached you will find a public comment letter on behalf of Lafourche Parish Government regarding the 2023 Master Plan. Please review the letter at your convenience. If there is anything that needs to be adjusted or if you need anything else, please do not hesitate to contact me anytime. We appreciate all of CPRA's dedicated work to complete the Master Plan. We look forward to continuing to work together in great efforts to improve our coast.

Thank you and have a great day,  
Megan Dufrene  
Lafourche Parish Government  
Office of Coastal Zone Management  
4876 Hwy 1 | PO Box 425 | Mathews, LA 70375  
[www.lafourchegov.org](http://www.lafourchegov.org)



4876 Highway 1 - Mathews, LA 70375  
P.O. Box 425 - Mathews, LA 70375  
985-537-7603 - FAX 985-532-2845

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

Archie Chaisson, III, *Parish President*

Office of Coastal Zone Management

March 22, 2023

Coastal Protection and Restoration Authority  
Master Plan Public Comments  
150 Terrace Avenue  
Baton Rouge, LA 70802

## RE: DRAFT FISCAL YEAR 2023 MASTER PLAN

Lafourche Parish commends the Coastal Protection, Restoration Authority (CPRA) for its accomplishments in the FY 2023 Draft Master Plan and appreciates the hard work and dedication in ensuring that comprehensive coastal protection and restoration advances in our communities. This plan includes the most comprehensive and largest investment towards coastal restoration and protection, with the majority of this funding dedicated to construction, and this is a testimony to not only the stance the State has taken to get as many projects on the ground as quickly as possible but to the tremendous effort in partnering with parishes, levee districts, and other involved entities to make sure all projects have the greatest impact once implemented.

Lafourche Parish has reviewed the FY 2023 Draft Master Plan and would like to submit the following comments:

### *South-East Golden Meadow Marsh Creation – Central:*

The southeast Golden Meadow Marsh Creation (central) is a creation of marsh area that will highly benefit many aspects of lower portion Lafourche parish. It will aid in protecting the community located near a flood gate that is extremely vulnerable to high water during storms due to being so close in proximity of the Gulf of Mexico waters. This project will also reduce wave energy against the levee system which ultimately help us fight against coastal erosion in the area as well. The marsh creation would fill in areas that have already began to erode due to aggressive the wave energy and frequent storms. These areas are typically deeper than 2.5 feet along the levee system. This marsh creation would provide healthy marsh enhancement to an area that was significantly impacted by hurricane Ida in 2021. Hurricane Ida destroyed majority of the marsh in this area leaving the land exposed to storm surge impacts.

### *Eastern Terrebonne Landbridge – East:*

The creation of this Landbridge is beneficial to areas from Bayou Point Aux Chenes to South Lafourche Parish, just below Catfish Lake. This project will create new healthy wetland area that will ultimately protect additional wetland that is located further inland between Terrebonne and Lafourche Parish. In addition, the Landbridge will also assist in the Larose Freshwater Diversion project that will reduce the salinity of the water above Catfish Lake as well. This will also encourage natural vegetation to grown within the protected area which will provide potential for future wetland and marsh habitats for marine life. Creating the Landbridge will restore approximately 44,000 feet of the Bayou Pointe Aux Chenes ridge as well. The Landbridge will include approximately 30,000 feet (6 miles) of shoreline revetment in order to limit the amount of erosion in areas that are already exposed to high wave action and erosion.

Archie Chaisson, III	Parish President
Jerry Jones	District 1
William "T-Boo" Adams	District 2
Michael Gros	District 3
Aaron "Bo" Melvin	District 4

Jim Wendell	District 5
Terry Arabie	District 6
Armand Autin	District 7
D'Iynn Chiasson	District 8
Daniel Lorraine	District 9

*Upper Barataria Risk Reduction:*

The Upper Barataria Risk Reduction project is the construction and improvement of a protection levee. This includes constructing the levee to an elevation of 10.5 or 15 feet (NVAD88) along highway 90 between the West Bank and Raceland. This levee has the potential to protect the natural land and the community that are often exposed to dangerously high-water levels, as well as protecting a portion of a state highway (highway 90). With the Upper Barataria Risk Reduction levee in place, the flood risk for the local communities will be significantly lower.

*Morganza to the Gulf:*

This project consists of the construction and improvement of a levee that surrounds and protects areas of both Terrebonne and Lafourche Parish. In Lafourche Parish, this levee provides protection for communities from Larose to Humphrey's Canal, which has an estimated population of 230k. The levee reduces the wave energy that impacts the land which also aids in preventing erosion.

*Southeast Golden Meadow Marsh Creation:*

The creation of marsh in the Southeast Golden Meadow area is crucial to protect both the land and wildlife. This area was openly exposed to Hurricane Ida. In which significantly impacted the existing marsh that provided a buffer to the surrounding flood protection system and communities. The area of interest is a highly recreational area for southern fisherman which provides for families in the surrounding communities. This marsh creation will create marsh nourishment which will ultimately provide a habitat for marine life. In addition to positively impacting marine life the marsh creation will also protect the portions of the levee that are already exposed to open water and high wave energy.

*Larose to Golden Meadow:*

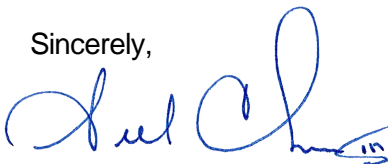
The Larose to Golden Meadow project includes improvements to a levee bringing the elevation to approximately 12 to 20 feet (NAVD88) within the Larose to Golden Meadow levee system. This project includes approximately 240,000 feet of earthen levee and 7,100 feet of T-wall. It protects an estimated population of 31k within the Southern Bayou Lafourche area. This area is extremely vulnerable to strong storms and hurricanes as it is closest to the Gulf of Mexico's water. With every incoming storm, the risk of erosion and flooding increases for those communities.

*Grand Bayou Freshwater Reintroduction (Pump Station):*

The Grand Bayou Freshwater Reintroduction project continues to be a top priority project for Lafourche Parish, in which we were able to leverage our local RESTORE Act funds through the CPRA Parish Matching Opportunity Program for the engineering and design of this project. Through this project, we will be able to make a systematic change to an area that receives little to no sediment input into its system. By introducing more freshwater into the area south of the GIWW, either naturally or by pump, we will be able to see a long-term and sustainable environment for fresh marsh habitat. As we continue to develop this project and complete the engineering and design, we look forward to partnering with CPRA to progress this project toward construction and implementation.

Lafourche Parish has a responsibility to protect the communities, natural resources, and infrastructure of our parish, and we stand ready to work with CPRA staff to find innovative ways to fund and implement these and future projects to ensure that they align with both parish and state priorities and goals. While we understand the budget constraints that are taken into consideration in the production of the 2023 Master Plan, we appreciate CPRA's consideration of our comments in this letter with regards to the FY 2023 Draft Master Plan.

Sincerely,



Archie Chaisson  
Lafourche Parish President

## CPRA Master Plan

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**From:** David Christopher Podgorski  
**Sent:** Tuesday, March 21, 2023 3:44 PM  
**To:** CPRA Master Plan  
**Subject:** 2023 Coastal Master Plan

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Dear CPRA,

I write to express my support of the 2023 CMP. I also want to express my support and gratitude to the CPRA for developing a more inclusive, forward-thinking position toward applied science.

Regards,  
David

David C.Podgorski (He, Him)  
Assistant Professor  
Department of Chemistry  
Pontchartrain Institute for Environmental Sciences  
Shea Penland Coastal Education Research Facility  
Chemical Analysis & Mass Spectrometry Facility  
University of New Orleans

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## CPRA Master Plan

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**From:** John Lane  
**Sent:** Wednesday, March 22, 2023 9:53 AM  
**To:** CPRA Master Plan  
**Subject:** Public Comment  
**Attachments:** SBPG Comments 2023 State Master Plan.docx

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Sent from my iPad

Thanks

John Lane



Guy McInnis  
Parish President

*St. Bernard Parish Government*

8201 West Judge Perez Drive    Chalmette, Louisiana, 70043  
(504) 278-4227    Fax (504) 278-4330  
[www.sbpge.net](http://www.sbpge.net)

March 20, 2023

Louisiana Coastal Protection and Restoration Authority  
150 Terrace Avenue  
Baton Rouge, Louisiana 70802

Re: 2023 State Master Plan Comments

To Whom It May Concern:

Please see the below comments from St. Bernard Parish Government (SBPG) regarding the draft 2023 State Master Plan.

1. **MRGO Ecosystem Restoration Plan.** Although the plan is referenced on page 151, it is unclear how the plan will ultimately be integrated into the 2023 State Master Plan and future planning and implementation efforts.
2. **Bayou La Loutre Ridge Restoration and Marsh Creation.** This project is not referenced in the draft 2023 State Master Plan. SBPG is generally aware that this project will be transitioned from CWPPRA into a different program. However, the next steps and timeline for initiating construction are unclear. The project has been funded since 2016.
3. **Largescale Sediment Diversions.** Please see below.

SBPG remains opposed to largescale sediment diversions in coastal Louisiana. The environmental impact statement (EIS) for the proposed *Mid-Barataria Sediment Diversion* project validated the Parish's concerns regarding the potential impacts of such projects. Additionally, SBPG's ongoing consultation with stakeholder groups has yielded new insights into the project's likely devastating adverse impacts. Although the comments outlined below are the specific to Mid-Barataria, they are illustrative of SBPG's general concerns with proposed largescale sediment diversions coastwide.



The Parish's comments regarding the draft EIS can be summarized as follows:

1. The stated project purpose and need are inconsistent with the actual project scope of work and likely outcomes;
2. The environmental and economic risks associated with the largescale diversion of freshwater into Louisiana's estuaries is well-documented;
3. The EIS describes the project's likely severe adverse impacts on the natural environment, including many that will be permanent;
4. The EIS describes the project's likely severe adverse impacts on the socioeconomic well-being of coastal communities;
5. The EIS identifies many particularly vulnerable communities that are likely to be disproportionately impacted by the proposed project;
6. The land-building capacity of the proposed project is likely overstated and the EIS supports previous findings regarding the possibility of the project causing land loss and increasing flood risk; and
7. The operational regime for the project may evolve in a manner that exacerbates adverse impacts to the natural and human environment over time.

The final EIS validated SBPG's concerns regarding the draft EIS. The Parish's comments regarding the final EIS are provided below.

***Large-scale marsh creation was dismissed as a project alternative, yet such projects are the centerpiece of the 2017 State Master Plan.***

The State of Louisiana has created over 40,000 acres of land via large-scale marsh creation since the 1990's. According to CPRA, \$18 billion in 2017 State Master Plan funding is dedicated to marsh creation while only \$5 billion is dedicated to sediment diversions (2017, ES-16). The periodic maintenance of large-scale marsh creation projects involves incidental expenses that CPRA has understood and accepted for decades.

***The Mississippi River already provides a sustainable source of sediment for coastal restoration.***

The Mississippi River will continue providing a sustainable source of sediment in perpetuity, as evidenced by the US Army Corps of Engineers (USACE) Operations and Maintenance program:

The U.S. Army Corps of Engineers, New Orleans District has the largest annual channel Operations and Maintenance (O&M) program in the nation and dredges an average of 77 million cubic yards (mcy) of material annually during maintenance dredging of federal navigation channels. (USACE, n. d.)

Since 2007, the USACE New Orleans District has beneficially used dredged material to create over 68 square miles (43,520 acres) of land despite only utilizing 42% of available/suitable dredged material (USACE, n. d.). USACE-managed hopper dredge disposal areas (HDDA) along the lower Mississippi River regularly contain millions of cubic yards of sediment.

***Long-distance sediment pipelines have the potential to deliver sediment from the Mississippi River to coastal restoration project sites throughout southeast Louisiana.***

The *East Bank Sediment Pipeline* project (CPRA BS-33) illustrates the potential utility of long-distance sediment pipelines in coastal Louisiana. The 2017 State Master Plan includes over 50,000 acres of marsh creation in the Breton Basin. The Mississippi River provides an out-of-system, renewable source of sediment for such projects.

***Restoring Louisiana's coast is an urgent, existential concern for residents and businesses. The region is in need of cost-beneficial coastal restoration projects that yield immediate results, particularly as it relates to flood risk reduction.***

Louisiana has experienced approximately 2,000 square miles of coastal land loss over the past century. Much of this has been caused by development practices (flood control projects, oil and gas exploration, and navigation canals) and tropical weather events. St. Bernard Parish was ground zero for Hurricane Katrina (2005), when levee failures caused over 100 fatalities and damaged or destroyed virtually all 67,000 structures in the parish. Nearly 5 million barrels of crude oil were later spilled near St. Bernard Parish during the *Deepwater Horizon* event (2010). The parish was subsequently impacted by the *Gulf of Mexico Freshwater Flooding* (2019) federal fishery disaster. Consequently, St. Bernard Parish and many neighboring communities have been in a constant state of disaster recovery for over 17 years.

CPRA projects that the parish may lose up to 72% (237 square miles) of its remaining coastal wetlands over the next 50 years. According to FEMA, 94% of the parish is in the Special Flood Hazard Area and the National Risk Index for St. Bernard Parish is higher than the national and state averages. Neighboring communities are similarly situated, and the region is in desperate need of coastal restoration projects that yield immediate results, particularly as it relates to flood risk reduction. The proposed project does not address this urgent, existential concern.

***Because restoring Louisiana's coast is an urgent, existential concern for residents and businesses, CPRA should not waste time and resources on an unproven project type.***

The 2017 State Master Plan highlights the importance of maintaining Louisiana's *working coast*, which CPRA describes as those ecological services that also generate economic benefits, including everything from oil and gas production to fish and wildlife habitat. The state has 15,000 miles of coastline and is home to 41% of all coastal wetlands in the US (NOAA, 2021, p. 17). Additionally, Louisiana has the second highest commercial seafood landings in the US and 25% of all seafood consumed in the country

is harvested from the state's waters (Jones, 2015). CPRA provides many other key statistics regarding economic activity along Louisiana's coast:

- 75% of Louisiana's commercial fin and shellfish depend on healthy coastal wetlands for spawning, nursery habitat, and feeding; and
- Ecological services (natural capital) in the state have an estimated value of \$1.3 trillion. (CPRA, 2017, p. ES-12).

Given the economic and cultural significance of Louisiana's coastal resources, litigation regarding largescale sediment diversions appears to be inevitable. Involved parties will incur significant legal expenses and proposed projects will ultimately be delayed or cancelled. CPRA time and resources would be more effectively dedicated to established, cost-beneficial project types such as large-scale marsh creation.

***The mitigation budget for the proposed project will not sufficiently address the impacts described in the final EIS.***

The Bonnet Carre' Spillway released approximately 10 trillion gallons of freshwater into the Pontchartrain Basin during the Gulf of Mexico Freshwater Flooding federal fishery disaster (2019). According to the Louisiana Department of Wildlife and Fisheries (LDWF), this event caused over \$267 million in damage in Louisiana alone (LDWF, 2021). Mississippi and Alabama also claimed hundreds of million in damages and were ultimately included in the resulting federal fishery disaster declaration. Based on the proposed project's scope of work and operational regime, similar impacts could be expected in the Barataria Basin annually.

## References

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<https://www.mvn.usace.army.mil/About/Offices/Operations/Beneficial-Use-of-Dredged-Material/>

**4. Black Bay Ridge Project.** SBPG proposed this project for inclusion in the 2023 State Master Plan but it has not been included in the draft. Please see below.

The 2023 State Master Plan is applying the Multiple Lines of Defense Strategy <sup>(1, 2)</sup> to create a sustainable landscape for Louisiana residents and businesses to thrive and prosper. All State Master Plans to date (2007, 2012, 2017 and Draft 2023) outline the benefits of a system that includes barrier islands, ridges, and marsh platforms, in combination with levees, floodgates and other structural improvements. In addition, storm-proofing, home elevations, buy-outs and relocations are also critical elements introduced to the planning efforts for a comprehensive approach.

Barrier islands and ridges with back-barrier marshes play a vital role in establishing the first line of defense in bay systems. They are part of a system that consistently changes in shape and location, through roll-over and reworking events induced by storms and consistent wave impacts. Therefore, the system as a whole is more important than each individual island or ridge. Each bay system requires an individual evaluation of the applicable multiple lines of defense system.

As can be seen in Figures 1 and 2 below, Terrebonne and Barataria Bays both have a first line of defense system that includes multiple islands. However, Breton Bay, has very limited protection, while being exposed to some of the highest (>21ft) flood depths, even with implementation of the State Master Plan. When comparing projected flood depths at year 50 with and without the current State Master Plan, there is barely any difference.

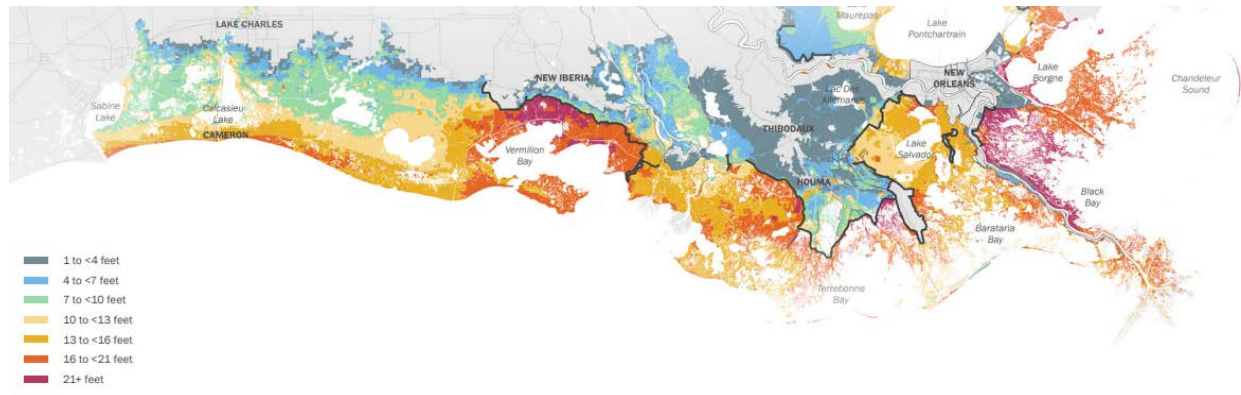
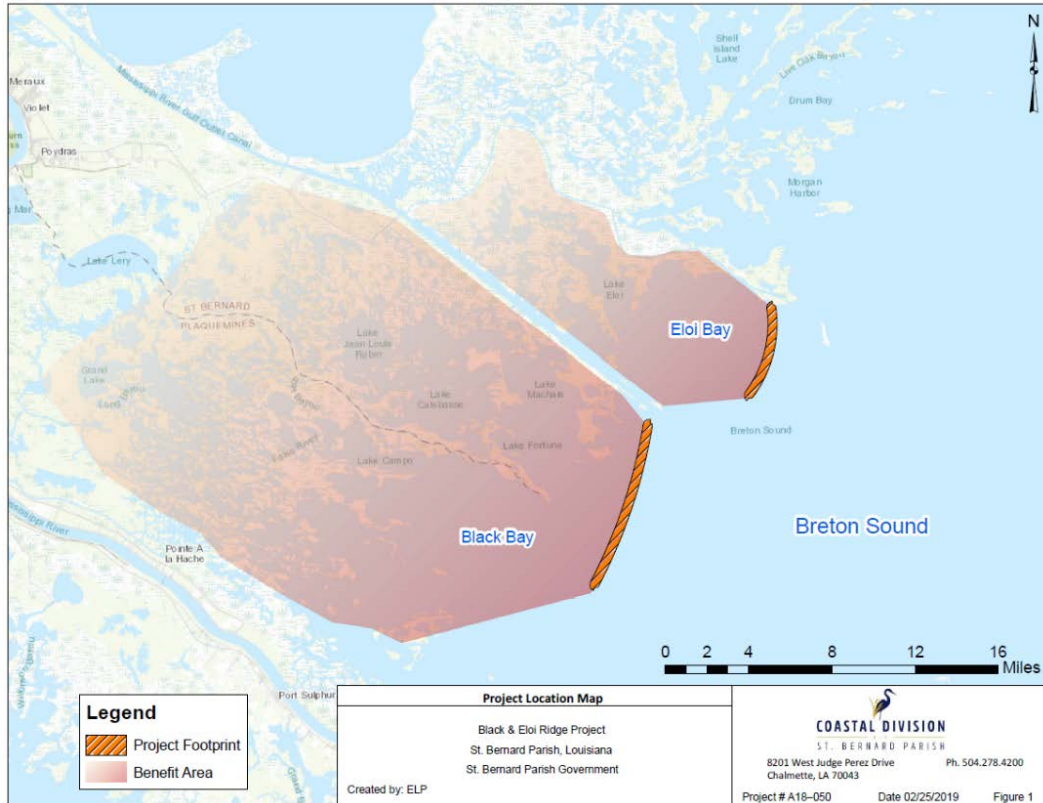


Figure 1: Draft 2023 State Master Plan: Flood Depths with State Master Plan at Year 50 (Lower Scenario)





*Figure 3: General Vicinity of Proposed Black & Eloi Bay first Line of Defense System*

The Breton and Chandeleur Islands are located too far from the current extent on the St. Bernard Parish and Plaquemines coastal marshes to provide sufficient wave attenuation or storm surge protection. The Draft 2023 State Master Plan does not include any projects that offer wave attenuation or storm surge protection for the coastal marshes in the proximity of the MRGO near Eloi Bay and Black Bay. Even with the Mid-Breton sediment diversion, St. Bernard Parish is expected to lose most of its coastal marsh in the coming decades.

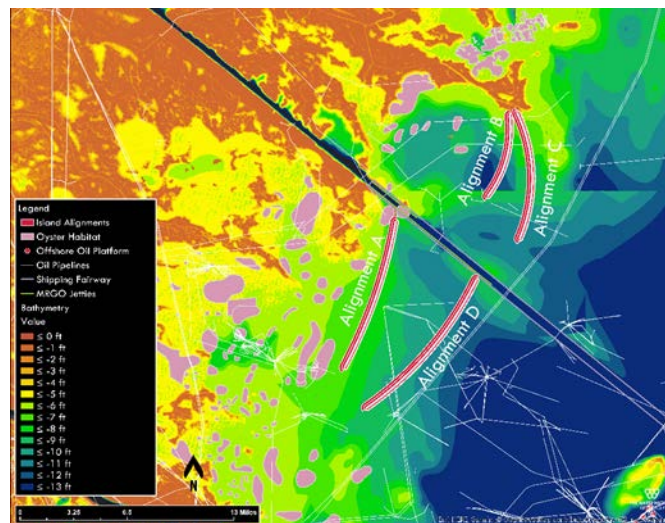
The proposed Black and Eloi Bay Ridge Project will provide immediate and much needed protection for these areas by absorbing wind and wave energy from the Gulf of Mexico and serving as a barrier to prevent further saltwater intrusion into the area. Additionally, the project will function in tandem with other State Master Plan projects proposed for the Breton and Pontchartrain Basins and, therefore, will contribute a positive impact to their functionality. As part of this project, SBPG is proposing to create two vegetated ridges with associated foreshore ridge stability foundations and back marshes at Black Bay and Eloi Bay in order to provide wave attenuation and storm protection for coastal marsh areas in St. Bernard Parish. The proposed design for the Eloi Bay portion extends south from Point Chicot toward the terminus of the MRGO. The Black Bay segment is proposed to extend south from Gardner Island toward the mouth of Black Bay. The location of the proposed alignments was historically part of the St. Bernard Delta complex. During portions of the growth and subsequent transgression of this delta, the area was at the forefront of the basin's interface with the Gulf of Mexico. The general vicinity of the project was carefully selected by evaluating historic land masses in the region (see Figure



4) as well as oyster habitat, pipelines, and bathymetry constraints. It is understood that more in-depth modeling during final design phase will refine exact location, shape and size of the project, as is the case for all projects undertaken by CPRA and its partners implementing State Master Plan projects. However, CPRA endorsed ICM Modeling was conducted for preliminary evaluation of potential alignments (Figure 5).



*Figure 4: Planning Level Alignment on Historical Map Overlay (1778)*



*Figure 5: ICM Model Set-Up for Planning Level Evaluation of Project*

Initial modeling has shown that the project would provide positive outcomes anticipated from a first line of defense system, such as reducing incoming wave heights and wave driven erosional forces on the protected side of the project area as well as reducing saltwater intrusion, hence promoting improved conditions for marshes.

The Eloi Bay and Black Bay segments of the project will be approximately 5.0 miles and 8.7 miles long respectively. The completed Eloi Bay and Black Bay segments will create approximately 1,063 acres and 1868 acres respectively of valuable wildlife habitat that will serve as nesting and foraging grounds for migratory bird, commercially important fisheries species, and potentially endangered sea turtles (which have recently been spotted nesting on the Chandeleur Islands). The newly created land would also provide an important waypoint for migratory birds moving along the Mississippi Flyway, an important migration route utilized by many bird species. Additionally, the construction of the project intends to use dredged sediment from the Mississippi River, a regenerating resource, which has been proven as an excellent borrow source for coastal restoration projects. Adding Mississippi River sand into the adjacent coastal areas is re-introducing a sediment source into the bay system that has been prevented from naturally nourishing the bay system by levees.

This project is consistent with State Master Plan objectives and principles and can be named ridge or barrier island. However, more important than its name is its function as a first line of defense. The proposed dune/ridge element in conjunction with the associated foreshore and marsh creation elements will provide valuable and immediate frontline protection for the coastal communities and ecosystems of St. Bernard and Plaquemines Parishes while creating thousands of acres of valuable coastal habitat.

In conclusion, and based on facts presented above, we request that this project be reconsidered for inclusion in the 2023 State Master Plan.

<sup>(1)</sup> [Multiple Lines of Defense Strategy - Pontchartrain Conservancy \(scienceforourcoast.org\)](https://scienceforourcoast.org/)

<sup>(2)</sup> <https://www.erdc.usace.army.mil/Media/Images/igphoto/2002513073/>

Thank you for your time and consideration.

Sincerely,

Guy McInnis  
Parish President  
St. Bernard Parish Government



## CPRA Master Plan

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**From:** Jenny Schexnayder  
**Sent:** Wednesday, March 22, 2023 1:29 PM  
**To:** Chip Kline; CPRA Master Plan; Bren Haase  
**Cc:** Enger Kinchen; Elizabeth Shoenfelt  
**Subject:** Public Comment in Support of the Coastal Master and Annual Plans  
**Attachments:** 2023 03-17 to Chip Kline-Coastal Master Plan-Letter of Support.pdf; 2023 03-17 to Chip Kline-CPRA 2023 Annual Plan-Letter of Support.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

On behalf of Dr. Clune, please accept these letters of support.



### Jenny Schexnayder

Coastal Program Manager  
Office of Coastal Support

**Nicholls State University**

Office: 985.448.4442

<https://www.nicholls.edu/coastal-center>

<https://bayouregionincubator.org>





**Nicholls State University**

**Office of the President**

P.O. Box 2001 | Thibodaux, LA 70310 | 985.448.4003 | 985.448.4920 [F]

March 17, 2023

**Via Electronic Transmittal Only**

Chip Kline  
Executive Assistant to the Governor for Coastal Activities  
Chairman, Louisiana Coastal Protection and Restoration Authority Board  
P.O. Box 94004  
Baton Rouge, LA 70804

Dear Mr. Kline:

On behalf of our university, please know my support for CPRA's 2023 Coastal Master Plan.

As the closest university to the region of greatest land loss and subsidence in the state, together with 87% of our students, faculty, and staff living in communities of coastal parishes, we at Nicholls understand first-hand the coastal problems faced by the state. And since our doors opened in 1948, our campus here in Thibodaux is closer to the nearest Gulf coastline than ever before. We are proud of our 75-year history of serving coastal communities and supporting their resilience, and we join you in continuing commitment to these goals. Through the developing Coastal Center on our campus, we look forward to a greater relationship with CRPA in addressing the state's coastal problems, which, as you are aware, are as critical in our service region as any other.

As per the agreement we signed with Governor Edwards in 2019, the Coastal Center will address coastal issues with particular attention to the dynamics of the Atchafalaya and Terrebonne basins. Our science and engineering faculty have undertaken research and environmental assessment in these basins for many years now, and their expertise will form the basis of our team at the Coastal Center.

I appreciate CPRA's efforts in continuing to involve the public in the development of the Coastal Master Plan. In a parallel fashion, our coastal team is working with regional levee and freshwater districts to develop the most effective and economical programming for our future work.

We support the 2023 Coastal Master Plan, and we look forward to serving our communities and the Louisiana coast.

Sincerely,

Jay Clune, PhD  
President



**Nicholls State University**

**Office of the President**

P.O. Box 2001 | Thibodaux, LA 70310 | 985.448.4003 | 985.448.4920 [F]

March 17, 2023

**Via Electronic Transmittal Only**

Chip Kline  
Executive Assistant to the Governor for Coastal Activities  
Chairman, Louisiana Coastal Protection and Restoration Authority Board  
P.O. Box 94004  
Baton Rouge, LA 70804

Dear Mr. Kline:

I am writing to acknowledge our university's support for CPRA's 2024 Annual Plan. The suite of projects designed to restore islands and shoreline, create marsh, improve flood protection and river hydrology, and address climate issues in Louisiana directly impacts our university's service region and both improves opportunities for our students and protects their homes.

As the closest university to the region of greatest land loss and subsidence in the state, together with 87% of our students, faculty, and staff living in communities of coastal parishes, we at Nicholls understand first-hand the coastal problems faced by the state. And since our doors opened in 1948, our campus here in Thibodaux is closer to the nearest Gulf coastline than ever before. We are proud of our 75-year history of serving coastal communities and supporting their resilience, and we join you in continuing commitment to these goals. Through the developing Coastal Center on our campus, we look forward to a greater relationship with CRPA in addressing the state's coastal problems, which, as you are aware, are as critical in our service region as any other.

We support the 2024 Annual Plan, and we look forward to joining you in serving our communities and the Louisiana coast.

Sincerely,

Jay Clune, PhD  
President

## CPRA Master Plan

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**From:** RYAN Lambert  
**Sent:** Wednesday, March 22, 2023 7:29 PM  
**To:** CPRA Master Plan  
**Subject:** master plan comments

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I am a supporter of the master plan since inception and still support the projects in the plan. As of now we are starting to see the results of the hard work that's been done. It is a rare exception that I don't agree with a project. I have to let my thoughts be known about Mid Breton diversion before it progresses any further. With the east side of the Mississippi River receiving upwards of 5 to 6 hundred thousand cfs there comes a time when we have enough water going through that side of the river. I don't see what another 35,000 cfs is going to do anymore to help the problem. There are many reasons for my opinion, one being the cost of putting another diversion into the east side of the river when its not needed. Second is the \$378,000,000 of payouts to special interest groups. The very same groups will be in line to get \$\$\$ from Mid Breton as well. Last but most important is the amount of water that is being diverted out of the river. With 500,000 to 600,00 on the east side and another 75,000 to come out for Mid Barataria we are getting very close to the amount that is going to trigger the navigation industry to fight to stop anymore water from being taken out of the river.

The problem with coastal erosion is that it is no longer coastal, There are redfish in the northern most reaches of the Barataria basin. The oaks are dying all the way to lake Boeuf and on every ridge from LA 3127 to Lake Boeuf. We are losing our cypress swamps as we speak. There is salt water intrusion throughout the entire basin. We should use the \$\$\$ from Mid Breton to put water into North Lake DesAlemands. This would save thousands of acres of swamps and start to rebuild the natural estuary through out the basin. Putting water into the system so far north will clean the water of any nitrates and sediment before reaching the gulf reducing the dead zone even more that it was this year. The water will flow through all the lakes and bayous in the Barataria system before reaching the gulf. The water and the dollars will be better spent doing this rather than putting more water into the east.

Thanks

Capt Ryan Lambert

## CPRA Master Plan

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**From:** Addison Ellis <noreply@crcl.org>  
**Sent:** Thursday, March 23, 2023 9:58 AM  
**To:** CPRA Master Plan  
**Subject:** CMP Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Addison Ellis

I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan.

Coastal land loss is one of the most significant and urgent issues facing our state. As such, restoration projects must be implemented as soon as possible. With every minute lost, we are losing ground. Our state must act to advance an equitable, safer and flourishing coast for Louisiana's communities, ecosystems and economy.

Louisiana has made significant progress in implementing restoration projects across the coast. We must continue. To ensure a better future for our state, we must move forward to build and sustain the Mississippi River Delta. Because they can make the most impact over time and support other investments made in restoration and risk-reduction projects, I believe the state should focus funding on large-scale projects first.

I strongly support the draft Coastal Master Plan. I am encouraged to see that it includes implementation periods that prioritize how projects should be advanced over time. I also support the Master Plan process, as it is publicly informed and grounded in the best available science. It also balances coastal restoration with protection and is realistic about the challenges we face along our coast. This process should serve as a model for how to involve experts, residents and other stakeholders in the decisions, and the foundation in science is of critical importance.

I encourage the state to continue to find opportunities to reach wider audiences. I also encourage CPRA to continue to find new and accessible ways to include all stakeholders in the process. The Master Plan Viewer is a welcome tool for communicating with people about projects in their own backyards.

Thank you

## CPRA Master Plan

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**From:** April Echevarria  
**Sent:** Thursday, March 23, 2023 12:04 PM  
**To:** CPRA Master Plan  
**Cc:** William B. Rudolf; ecmcdade@bellsouth.net; Bren Haase; Chip Kline; Stuart Brown  
**Subject:** Public Comment  
**Attachments:** Biloxi Marsh and Lake Eugenie Comments for CMP23 -FINAL 3-23-23 Executed.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Attached please find Biloxi Marsh and Lake Eugenie comments for CMP 2023.

The original will be sent via Federal Express today.

Thank you,

April

April R. Echevarria

Biloxi Marsh Lands Corporation  
Lake Eugenie Land & Development, Inc.  
One Galleria Blvd., Suite 902  
Metairie, Louisiana 70001  
(504) 837-4337

March 23, 2023

**VIA Email: masterplan@la.gov**

The Coastal Protection and Restoration Authority  
Master Plan Public Comments  
150 Terrace Avenue  
Baton Rouge, LA 70802

RE: Comments  
DRAFT 2023 Coastal Master Plan

Dear CPRA Members:

Biloxi Marsh Land Corporation (BILOXI) and Lake Eugenie Land & Development, Inc. (LAKE EUGENIE) appreciate this opportunity to submit comments to the Coastal Protection and Restoration Authority (CPRA) concerning the DRAFT 2023 Coastal Master Plan (CMP23). BILOXI and LAKE EUGENIE own approximately 150,000 acres of marsh lands located in St. Bernard Parish, Louisiana which make up a portion of the 450,000-acre Biloxi Marsh Complex (BMC) southeast of New Orleans and south of Slidell, Louisiana. Since 1957, BILOXI has made available over 35,000 acres of property, at no cost, that constitute the Biloxi Wildlife Management Area (WMA), which is enjoyed by the public for multiple recreational uses. BILOXI and LAKE EUGENIE have been and continue to be proactive in efforts to protect and restore Louisiana's coast and for many years, have supported scientific research focused on identifying root causes for land loss in the BMC as well as examining its potential for long-term sustainability. Considerable efforts including scientific evaluations, project proposals, research reports and peer-reviewed publications compiled since 2006 have been provided to the CPRA. Scientific resources are available on the BILOXI website<sup>1</sup>, link provided below. In addition, presentations were made at public forums such as Louisiana Coastal Geology Symposium (McDade, 2019), State of the Coast (McDade, 2020), and Back to the Basin (Day, 2019).

- Website: Biloxi Marsh Lands Corporation -- Biloxi Marsh Coastal Restoration
- Peer-reviewed scientific journal articles: Kemp et al. 2021; Lane et al. 2021
- Reports transmitted to CPRA: Day et al, 2019, Poirrier 2019
- Project Proposal submitted in response to RFP for CMP 2023: Rudolf 2019
- Comments by BILOXI and LAKE EUGENIE in response to DRAFT Coastal Master Plan: 2017: Rudolf 2017, McLindon 2017, Kemp and Day 2017
- Project proposals and rationale: The Biloxi Marsh Stabilization and Restoration Plan, 2006

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<sup>1</sup> <https://biloximarshlandscorp.com/biloxi-marsh-coastal-restoration/>

## **Significance of the BMC**

Our March 24, 2017, comments for DRAFT 2017 Coastal Master Plan provide detail on the economic value of BMC goods and services including: hurricane and flood protection, fisheries, wildlife habitat, water quality, and recreation. Because of its size, the high level of commercial and recreational fisheries, and its value as a natural habitat, marshlands of the BMC, Lake Borgne, and Chandeleur Sound comprise one of the most important areas in the coastal zone.

## **2023 DRAFT Coastal Master Plan (CMP23) Comments**

Overall, CMP23 is an improvement over the 2017 Coastal Master Plan as it includes some projects for the combined Pontchartrain/Breton Basins. However, we are concerned that CMP23, like earlier master plans, has not definitively acknowledged nor addressed the root cause of degradation in the BMC, and thus, does not properly prioritize projects necessary to protect and restore this important land mass within a reasonable timeline. To be clear, armoring and stabilizing the southeastern Lake Borgne shoreline to prevent significant marsh loss is the immediate priority and requires prompt implementation. This prioritization should not diminish the critical need for the implementation of other projects including without limitation those projects set forth in USACE-MRGO Ecosystem Restoration Plan (USACE 2012) to save this massive wetland area. Furthermore, projects that improve the long-term sustainability of the BMC will benefit the other planned projects in the Lake Pontchartrain Basin through an integrated approach for projects.

There are improvements needed to be addressed in the CMP23 prior to its adoption. The following are specific items that should be addressed in the CMP23 related to the BMC:

- **CMP23 should clearly acknowledge that the root cause for degradation in the BMC is marsh edge erosion along a portion of the western shoreline of the peninsula with Lake Borgne resulting in shoreline retreat, compounding marsh loss from increased hydrologic connections to the marsh interior.** Like other Louisiana coastal marshes, BMC has suffered land loss in the last century (Couvillion et al. 2016, Penland et al. 2000), but unlike other coastal marshes, subsidence is not the chief culprit causing areas of emergent marsh to become open water (Day et al. 2019, Lane et al. 2020, Kemp et al. 2021). Land loss in the BMC has been shown to result from marsh edge erosion due to extreme shoreline retreat along the western shoreline of the BMC peninsula with Lake Borgne from near St. Malo to Three Mile Bay (Couvillion et al. 2016) which in turn has accelerated exposure to the marsh interior, increasing tidal flux and marsh loss. Cold fronts severely batter the BMC at least 10-20 times each year with strong winds that rapidly shift in direction from southerly to northerly following each frontal passage causing rapid water level drop (Moeller et al, 1998, Feng 2009), a scenario which negatively affects the BMC particularly along the southeastern shoreline of Lake Borgne area due to its local geographic configuration (Guo et al. 2020, Trosclair 2013). The high frequency of frontal passages and the well-documented detrimental effects must be an important component of designing and prioritizing projects for the BMC and obviously dictates that shoreline protection be implemented as soon as possible. In its natural condition, the BMC shoreline was protected by naturally formed berms composed of shell from Lake Borgne's vibrant population of *Rangia* clams (Poirrier, 2019, Poirrier 2013). **CPRA should acknowledge the root cause for degradation in the BMC and promptly implement projects which address and resolve this root cause.**



- CMP23 should include and prioritize the completion of PO72 as initially designed and approved for implementation and should be expanded to include additional shoreline to Malheureux Pt.** To stem land loss in the BMC, the need for protection of the western shoreline from damaging waves and tidal incursion with a rock berm has been recognized since 2006 to be a high priority to prevent shoreline retreat and further degradation of the BMC (King et al., 2006) and was a cornerstone of our submittal for CMP23 in response to CPRA's project solicitation in 2019 (Rudolf, 2019). PO-72, a CWPPRA project completed in 2014, clearly has had a strong benefit for sediment capture in satellite aerial views in time series from Google Earth and appears to create an environment conducive to marsh growth into Lake Borgne (Day et al. 2019, Lane et al., 2020). But only 4 miles of the planned 7-mile extent of PO-72 were completed, and now, the shoreline that was not protected by PO-72 to Malheureux Pt. is the area with the worst shoreline retreat. We are pleased to be included in the planning process for the 3 miles of protection of CWPPRA PPL33 Biloxi Marsh Shoreline Protection project currently under development and look forward to following this critically important project through to funding and implementation. However, this project is merely the portion of PO-72 that was not completed despite being planned, permitted, and funded. While we are grateful for any project in the BMC, the 3 miles of protective berm proposed for PPL33 are not of the scale needed to protect the whole NW-projecting point from the end of PO-72 past Malheureux Pt. as we originally proposed. Our proposal as modelled for CMP23 and ultimately not chosen, coupled with the extension of PO-72 in PPL33 and the Three Mile Bay project that is in CMP23 are all critically needed to protect the western BMC shoreline.
- CMP23 should include other critical elements of our project proposal: "Leveraging Natural Resilience to Ensure Long Term Sustainability of Biloxi Marsh Complex"** As discussed above, one element of our 2019 project proposal for CMP23 includes a shore-parallel concrete berm to address shoreline retreat from the end of PO-72 to Malheureux Pt. Marsh creation using dredged material and marsh nourishment using thin-layer sediment dispersal methods are other important components of our integrated project proposal. Beneficial use of dredged material and adding mineral sediment to the marsh where possible would augment and improve the success of the overall project area and benefit a larger area than just the project footprint. Long-term, with a protective berm, BMC's stable geologic environment would be expected to have a positive effect on project longevity and its ecosystem.
- CMP23 should include all elements of the MRGO Ecosystem Restoration Plan** (USACE 2012). The recent announcement that the Federal government intends to fund the State's share of the costs associated with the implementation of this plan is encouraging. CPRA and the USACE should work together to identify funding sources for the prompt implementation of this plan. Prompt funding and impletion of all the components of this plan are required to stabilize and restore the BMC from the well documented disastrous effects of the construction and operation of the MRGO on the BMC (USACE 2008).
- CPRA should not overemphasize projects that build new land at the expense of developing and supporting projects that preserve existing, but vulnerable coastal lands like the BMC shoreline and marsh interior.** While CPRA has acknowledged the scientific results and benefits of shoreline protection along Lake Borgne, these tenets have not instigated urgency, and projects designed to stem land loss for much of the BMC remain uncompleted. It seems CPRA evaluation

methods for project selection leave important areas with simple solutions out of action in part because of decision-making criteria based on models with inappropriate, incomplete, or incorrect data and assumptions (Rudolf 2017, Kemp and Day 2017, McLindon 2017, Day et al 2019).

Thank you for the opportunity to provide comments to the DRAFT 2023 Coastal Master Plan. Please let us know if you have any questions or wish to discuss any of the comments.

Sincerely,



William Rudolf

President & CEO, Biloxi Marsh Land  
Corporation and Vice President & General Manager,  
Lake Eugenie Land & Development, Inc.

Cc- Chip Kline, Chairman CPRA  
Bren Haase, Executive Director CPRA  
Stuart Brown, CPRA  
Board of Directors, Biloxi & Lake Eugenie

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## CPRA Master Plan

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**From:** Roy, Kevin  
**Sent:** Thursday, March 23, 2023 3:07 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment  
**Attachments:** FWS SMP Comments\_3-23-2023.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Attached are comments on the draft 2023 State Coastal Master Plan.

Kevin Roy  
CWPPRA Program Coordinator  
U.S. Fish and Wildlife Service  
Louisiana Ecological Services  
200 Dulles Drive  
Lafayette, LA 70506



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Louisiana Ecological Services  
200 Dulles Drive  
Lafayette, Louisiana 70506



March 23, 2023

Coastal Protection and Restoration Authority  
Master Plan Public Comments  
150 Terrace Avenue  
Baton Rouge, LA 70802

To Whom It May Concern:

The Fish and Wildlife Service (Service) submits the following comments on the 2023 Draft Coastal Master Plan:

- 1) A distinction should be made between ridge projects along historical ridges (e.g., Bayou L'Ours Ridge Restoration) where the intent is to restore forested, upland ridge habitat and the "ridge" feature associated with landbridge projects (e.g., Eastern Terrebonne Landbridge). The "ridge" feature associated with landbridge projects may be more appropriately designated/described as a lakeshore/bayshore elevated berm.
- 2) Further clarification is needed on the features associated with landbridge projects (e.g., Eastern Terrebonne Landbridge, Mid-Barataria Landbridge-West, etc.). For example, Map 6.10 on page 127 indicates bank stabilization and ridge restoration associated with the Eastern Terrebonne Landbridge Project. However, the description of the Eastern Terrebonne Landbridge Project on page 128 indicates shoreline revetment but fails to mention ridge restoration or bank stabilization.
- 3) The 2017 State Master Plan viewer included options for different basemaps (e.g., imagery and topo). Please include satellite imagery, aerial photography, and topo maps as options for 2023 State Master Plan Data Viewer.
- 4) Figures 6.14 on page 128 and 6.18 on page 140 should include a description of the ridge and bank stabilization components of the landbridge project features. The current descriptions included shoreline revetment. However, the figures on pages 126-127 and 138-139 indicate bank stabilization and ridge features associated with the landbridge projects.
- 5) The Large Scale Barataria Marsh Creation feature is located within the immediate outfall of the Mid-Barataria Sediment Diversion. Construction of the Mid-Barataria Sediment Diversion is scheduled to begin in Summer 2023 and is projected to restore/maintain thousands of acres of marsh within this area. The Future Without Action scenarios depicted on pages 40-43 indicate land gain under the Lower Scenario and land

maintenance (i.e., no land loss) under the Higher Scenario. A 15,000-acre marsh creation feature within the land-building footprint of a major sediment diversion does not appear to be a wise use of restoration resources. The coastal community would be better served if those resources were allocated to areas of greater need and without the benefit of a sediment diversion.

- 6) Several CWPPRA projects recently approved for construction could be “added” to project feature polygons and those polygons revised. Examples include BS-32 Mid Breton Landbridge Marsh Creation and Terracing, BS-38 Breton Landbridge Marsh Creation-West, and CS-78 No Name Bayou Marsh Creation and Nourishment.
- 7) The image caption on page 153 should be revised to “New Orleans Landbridge Shoreline Stabilization and Marsh Creation (PO-169). The project began construction in 2022.
- 8) Please consider extending the North and East Lake Lery Marsh Creation Project along the entire eastern Lake Lery shoreline. The area north of Lake Lery is certainly a key feature in affording protection to the communities and storm protection features to the north. Restoration within that area was identified as a project feature based on marsh loss projected over the next 50 years under the Future Without Action scenario. Currently, several thousand acres of marsh exist north of the lake. In contrast, the entire eastern Lake Lery shoreline has eroded, marsh east of the lake has almost entirely disappeared, and only small islands of marsh remain between the lake and the community of Delacroix and Highway 300. The community, highway, and two previously constructed marsh creation areas will become increasingly vulnerable to wave energy resulting from several miles of fetch across Lake Lery. This is one of the most critical areas to address in the upper Breton Sound Basin. An extension of this feature along the eastern Lake Lery shoreline would seem to be in the best interest of the communities and infrastructure within the project vicinity.
- 9) Please consider an alignment shift in the southern end of the Mid-Barataria Landbridge – West feature to continue along the Bay L’Ours/Bay Dos Gris shoreline and connect with the BA-37 Little Lake Shoreline Protection-Dedicated Dredging near Round Lake Project. This would provide an opportunity to take advantage of existing shoreline protection, potentially “re-purpose” other existing shoreline protection features, and extend the landbridge function by connecting to an existing CWPPRA project.

If you have any questions regarding these comments, please contact me at [kevin\\_roy@fws.gov](mailto:kevin_roy@fws.gov) or (337) 291-3120.

Sincerely,

Kevin J. Roy  
CWPPRA Program Coordinator

## CPRA Master Plan

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**From:** Allen, Timothy  
**Sent:** Thursday, March 23, 2023 3:32 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment  
**Attachments:** Master Plan Comments - ALM'23.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Thank you for the opportunity to submit these comments.

Timothy J. Allen, PLS  
***Apache Louisiana Minerals LLC***  
A subsidiary of ***Apache Corporation***  
P.O. Box 206, Houma, LA, 70361  
Phone (985) 879-3528 Ext. 8719





**APACHE LOUISIANA MINERALS LLC**  
(985) 879-3528 TEL · (985) 876-5267 FAX

Mailing Address:  
Post Office Box 206, Houma, LA 70361-0206

Deliveries Only:  
1913 LaTerre Court, Houma, LA 70363-7525

March 20, 2023

Coastal Protection and Restoration Authority  
Master Plan Public Comments  
150 Terrace Avenue  
Baton Rouge, Louisiana 70802

Master Plan Team:

We commend the efforts of the CPRA staff in the development of the 2023 Master Plan document. The online interactive map is a great tool to help visualize the plan throughout the next 50 years. The following comments are from the perspective of a large coastal landowner with many years of experience dealing with the coastal restoration initiative, both privately and publicly funded. Please accept our comments for the DRAFT 2023 Master Plan as follows:

- Landowner input and involvement is crucial with the majority of the land along the coast held in private ownership. Landowners aren't merely 'stakeholders', they are integral partners with CPRA in implementing the Master Plan. More credence should be given to the folks who live, work and pay taxes in the area of proposed protection. The plan should speak to the fact that projects will be considered only when there are willing landowners, and expropriation will not be a tool employed to accomplish this plan.
- We support the continued use and implementation of the Conservation and Restoration Partnership Fund, and further, request that the funding for this program be increased annually.
- The Mud Lake Marsh Creation (Project ID: 210) project is partially on Apache land and we support the concept of marsh creation here. However, there is an active oil and gas field within this project area for which landowners and oil and gas operators can be an invaluable wealth of information for you during project design to avoid conflicts and ensure implementation.
- We support the concept of moving Atchafalaya River water eastward into Terrebonne Parish to combat the effects of saltwater intrusion in the lower reaches of the parish (Project ID: 362). This is the only meaningful solution for lower Terrebonne. The Increase Atchafalaya Flow to Terrebonne (TE-110) project has been on the books for nearly 10 years with little progress toward implementation. Your newly added Atchafalaya River Diversion project (108) promises to be equally difficult and will likely not significantly help lower, central Terrebonne. We urge you to find a meaningful, economical way to harness this river water and divert it to the areas of need.
- We support the Western Terrebonne Hydrologic Restoration project (Project ID: 342) to re-establish freshwater flows through Bayou Carencro, allowing freshwater flow to combat saltwater intrusion in western Terrebonne Parish. This project is located on our neighboring landowner, and we urge you to coordinate with them regarding this project design.
- We are an affected landowner and support the Four League Bay – Blue Hammock Bayou Marsh Creation project (Project ID: 337) to restore degraded marsh and reduce wave erosion along these large waterbodies. We also support the Point Au Fer project (Project ID #344-b), however, the



needs in eastern Terrebonne are more immediate, therefore, the implementation period for these two projects should be delayed.

- We do not support the Mauvais Bois Ridge Restoration project (Project ID: 130); a significant portion of which is located on Apache property. The eastern half of the delineated project is a pristine cypress ridge which should be left untouched. Furthermore, we will not grant 'landrights' for the portion of this project located on our property, so it is requested that you eliminate this project from the Master Plan. We had previously requested this project be removed from the 2017 Master Plan also. If you choose to keep this project in the Plan, it should certainly not be in implementation period one. We suggest that your efforts at restoration in this area of the coast should be directed to the following bullet point:
- We support the Bayou Decade Ridge Restoration (Project ID: 127), the North Lake Mechant Marsh Creation – West (Project ID: 286D) and the North Lake Mechant Marsh Creation – East (Project ID: 286C) projects to continue the 'land bridge' concept in central Terrebonne that has been adopted by several constructed CWPPRA projects (TE-28, TE-34a, TE-44, TE-72 and TE-138), along with privately funded restoration efforts. This suite of projects, along with CWPPRA projects TE-156 & TE-156, would provide more synergistic benefits (and not impact pristine wetlands) like the proposed Mauvais Bois Ridge project mentioned above.
- Apache is an affected landowner for portions of the Eastern Terrebonne Landbridge - West and Central (Project ID 335E), Eastern Terrebonne Landbridge - East (Project ID:335D) and Lower Barataria Landbridge – East (Project ID: 325C) projects. While we certainly support these concepts and recognize they are highly regarded by the respective parish officials, we are not in favor of creating adjacent, large borrow channels through vegetated wetlands in order to construct these landbridge/ridge features.
- CPRA support of the Morganza to the Gulf and HNC lock are appreciated and are absolutely essential to the sustainability of the land, culture and people of Terrebonne and Lafourche Parish. We encourage the continued efforts to develop an operating regime for the HNC lock complex in order to combat saltwater influence and move seasonally available freshwater into the adjacent wetlands.

In conclusion, we respectfully request that our comments be incorporated into your draft Master Plan before submitting it to the legislature. We are happy to answer any questions or otherwise support your efforts to finalize and implement this Master Plan for protecting coastal Louisiana.

Sincerely,

**APACHE LOUISIANA MINERALS LLC**



Timothy J. Allen, PLS  
General Manager

## CPRA Master Plan

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**From:** Chris Macaluso  
**Sent:** Thursday, March 23, 2023 3:48 PM  
**To:** CPRA Master Plan  
**Cc:** Kendra Davis  
**Subject:** Comments and Scorecard for 2023 Draft Coastal Master Plan  
**Attachments:** master plan comments .docx; 2023 Master Plan Scorecard.docx

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Dear CPRA Master Plan team,

Please see the attached documents containing the comments from the Theodore Roosevelt Conservation Partnership on the 2023 Draft Master Plan as well as a "scorecard" of how the draft plan performed according to the priorities of the TRCP and its partners.

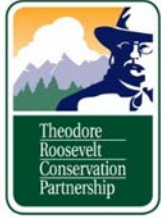
Thanks for the opportunity to comment on the plan and for working with our organization and many others throughout the development of the Draft Plan.

Sincerely,

Chris Macaluso

Center for Marine Fisheries Director

Theodore Roosevelt Conservation Partnership



## Theodore Roosevelt Conservation Partnership

529 14<sup>th</sup> Street NW, Suite 500

Washington, DC 20045

March 23, 2023

Louisiana Coastal Protection and Restoration Authority

### **RE: Draft 2023 Louisiana's Comprehensive Master Plan for a Sustainable Coast**

The Theodore Roosevelt Conservation Partnership is a national non-profit organization that works with 63 partner organizations, including some of the largest habitat conservation and hunting and angling trade and advocacy groups in the United States. The TRCP's mission is "to guarantee all Americans quality places to hunt and fish." We accomplish this mission by uniting and amplifying our partners' voices to advance America's legacy of conservation, habitat and access.

The TRCP has been highly engaged in advocating for the comprehensive restoration of coastal Louisiana for the last decade. The Mississippi and Atchafalaya Deltas, the Chenier Plain, the Lake Pontchartrain Basin and all South Louisiana's wetlands, swamps, bayous, lakes and rivers offer some of the world's best hunting and angling opportunities. The TRCP and its partners have long recognized these habitats are imperiled for a variety of reasons including subsidence, sediment starvation, sea level rise, hurricanes, saltwater intrusion, man-made navigation channels and the 2010 Deepwater Horizon oil disaster among others. Louisiana's coastal habitats and its communities are threatened by the loss of more than 2000 square miles of wetlands, barrier islands, swamps and other ecosystems over the last century, jeopardizing the rich culture, productive fisheries and economic viability of the entire Gulf of Mexico region.

The TRCP offers the following comments regarding the Draft 2023 Comprehensive Master Plan for a Sustainable Coast:

The Louisiana CPRA is to be commended for another outstanding iteration of the Master Plan. Since 2007, Louisiana has been a leader in the development and implementation of large-scale ecosystem restoration efforts thanks to the Master Plan process. The 2023 Master Plan builds off a strong foundation of combining habitat restoration with levees, floodgates, pumps and other physical structures in establishing a multiple lines of defense strategy that incorporates natural infrastructure with man-made physical structures. Incorporating this approach is something TRCP and its partners are pushing for in other large-scale, river basin and coastal ecosystem management plans. The 2023 Draft Plan continues the precedent set in previous plans to split financial resources as evenly as possible between physical structures and habitat restoration, which the TRCP commends.

The Draft Plan contains several maps that detail what the best available science and models predict for the future of coastal Louisiana, including maps that project future land loss predictions and storm surge

inundation potentials both without projects prescribed in the plan and without. This marks an improvement over past plans that did not have the sophisticated modeling available now and it also, hopefully, helps the public and lawmakers better grasp the future of Louisiana's coast. Despite the laudable goals of the plan and the ambitious list of projects, the plan does not veil the fact that some areas cannot be afforded levee protection, that levees will not safeguard all communities and that coastal land loss will continue in nearly every basin even with project construction. The plan does include efforts like potential land acquisitions, home elevations and other efforts to help mitigate the impacts from hurricanes, sea level rise and other factors and its important for the CPRA to continue to inform coastal residents about future threats and available opportunities to help guard against those threats.

The 2023 Draft Plan also paints a realistic picture of available resources, including identifying and explaining the various funding sources being used for project development and construction. The plan is also candid in the limitations of those resources and how additional funding sources will have to be identified. The TRCP is pledging to assist the CPRA in helping secure additional funding sources through federal legislation, appropriations and other processes in the future. In addition to addressing the funding sources and their limitations, the plan also does a good job of explaining that natural resources, especially sediment, is also limited and may not be readily available to build every project in the plan, which reinforces the need to utilize the available sediment suspended in the Mississippi and Atchafalaya Rivers through diversions. The plan also does a good job of prioritizing projects that can deliver the maximum benefits to the ecosystem and to coastal communities given the limitations on financial and sediment resources, calling for those projects to be built within the next 10-25 years while envisioning construction of additional projects beyond that timeframe should financial and natural resources become available.

The CPRA is to be commended for again prioritizing public outreach and engaging stakeholders throughout the plan's development. The number and quality of the public meetings held and CPRA's willingness to meet with groups like the Louisiana Charterboat Association, Coastal Conservation Association, concerned citizens across the coastal parishes and consistently engage legislators and public officials in the process demonstrates a true commitment to getting public buy-in in the process. CPRA's public engagement efforts should serve as a model to other state and federal agencies of how to engage with the public on complex environmental and resource management issues.

The plan also does a good job of illustrating how successful the Master Plan process has been in the past and how past plans have resulted in large-scale improvements to coastal habitats and protection for coastal communities. Recognizing these accomplishments and bringing public attention to them shows the commitment of the agency to utilizing public funds for their intended purposes and for the best public benefit and demonstrates CPRA's commitment to continue that effort in the 2023 plan and beyond.

While the plan overall is excellent and represents the most comprehensive, scientifically-based and realistic Master Plan to date, there are some areas the TRCP and its partners believe will improve the Draft Plan before it is submitted to the Louisiana Legislature for approval.

First, an executive summary that details the overall funding sources, the number and types of projects included in the plan and the benefits of those projects would help the public better comprehend the plan. The plan is extremely detailed and contains more specific information about projects than past

plans. However, these details are spread throughout the document and can be difficult to ascertain without an thorough reading of the plan, something the majority of the public is not likely to do. An executive summary will help the public understand the basics of the plan without having to take the two hours or more to read the plan thoroughly.

Though diversions are just one of many project types in the plan, they are generally the restoration projects that draw the most public attention and tend to be most polarizing. The plan dedicates some language and space to highlighting the projects and includes the projected land gains from both the Mid-Barataria and Mid-Breton Diversion projects. However, there is very little explanation of the implicit need for diversions in order to have the opportunity to begin reversing the damage brought by sediment loss, subsidence and saltwater intrusion. There is also no explanation of the mitigation efforts the CPRA has prescribed for the impacts of the Mid-Barataria Diversion nor the benefits the project and other diversions will bring to fisheries and wildlife resources in the future. The TRCP appreciates that this is a comprehensive plan that takes accounts for all restoration and protection efforts and focuses on “big picture” priorities. However, given the level of public discourse concerning diversions and the continued strong opposition to the projects by some commercial fishing groups, it is worth considering including a section of the Master Plan that explains in detail the expected benefits of the projects, how they are essential and are the best options available to sustaining and reviving coastal marshes and swamps in the Mississippi River Delta, the species of fish and wildlife that will benefit most from the projects, what fish and wildlife could be potentially detrimentally affected and what the future of the coastal basins and swamps could look like from an ecological productivity and coastal protection perspective once the projects are operational.

The TRCP commends the CPRA for including additional diversions in the upper Barataria Basin and Maurepas Swamp in the draft plan as well as for pointing out that it will continue to work with the Corps of Engineers on its Lower Mississippi River Comprehensive Management Study to determine how diversion operation can be used as flood control on the river and to determine potential flooding in the basins due to diversion operation. The CPRA should continue to provide to the public as much information as possible concerning diversions and how the projects can be used for both habitat restoration, fisheries and wildlife enhancement and flood control.

The TRCP has scored the 2023 Draft Master Plan according to the priorities of its partners and the hunting and angling community it represents. The score card is included in this email and goes into more detail about how the Draft Plan addresses or falls short in addressing the concerns and priorities of our organization and its partners. Assuming the plan passes the legislature, the 2023 Master Plan will receive an “A” grade according to the scorecard.

The TRCP appreciates the opportunity to comment on the 2023 Draft Master Plan and we look forward to continuing to work closely with the CPRA to advance the 2023 plan and future master plans.

Sincerely,

Chris Macaluso

Director, Center for Marine Fisheries

Theodore Roosevelt Conservation Partnership

2023 Louisiana Coastal Master Plan Hunter/Anger Scorecard

Project Criteria	3: Strongly Agree	2: Agree	1: Somewhat Disagree	0: Strongly Disagree	Score
The plan is based in science and reflects the latest scientific modeling.	The plan is thoroughly scientific based and modeling of projected land loss scenarios, sea level rise and future without action is extensive. Also, the anticipated benefits of the Mid Barataria Diversion, Mid Breton Diversion on land building are clearly demonstrated. The plan clearly explains how the modeling has evolved as greater understandings of sea level rise, subsidence, additional land loss, sediment availability have developed.				3
The plan maintains a commitment to sediment diversions and other diversions as a cornerstone of restoration efforts.	The 2023 plan clearly maintains a commitment to the Mid-Barataria and Mid-Breton diversions and is the first master plan to include the positive				3

2023 Louisiana Coastal Master Plan Hunter/Anger Scorecard

	land-building and habitat maintenance capacities and expectations of the Mid Breton, Mid Barataria and Maurepas Swamp Diversions. It also describes how upper basin diversion projects will be needed to improve habitat quality or coastal swamps. While the additional upper basin diversions are not slated for construction in the near-term like Mid Barataria and Mid Breton and Maurepas Swamp, the plan does envision construction and prescribes adaptive design, working with the Corps of Engineers on its Lower Miss River Study and how future diversions				
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2023 Louisiana Coastal Master Plan Hunter/Anger Scorecard

	will need to be designed and operated in concert with existing projects to limit inundation and maximize available sediment and water resources.				
The plan uses modeling to determine optimum diversion operations for sediment delivery with regard to impacts on fish and wildlife and prescribes mitigation measures to help fisheries adapt to changes.		Modeling has been used extensively to determine optimum diversion operations to maximize sediment delivery. Mitigation measures have been prescribed in detail for the Mid Barataria Diversion, through the Corps of Engineers permitting documents with the CPRA detailing how it will mitigate impacts to the			2

2023 Louisiana Coastal Master Plan Hunter/Anger Scorecard

		basin caused by diversion operation. However, many of those details are not included in the master plan as they have evolved outside of the Master Plan development process.			
The plan contains information related to expected impacts of diversions for important recreational fishing species and forage base.			The plan does not go into great detail about the impacts of diversions to recreational fish species and the forage base. While there is ample information about the land-building capacities of the diversions and the need to introduce freshwater and sediment into basins where lack of sediment and freshwater have led to marsh loss and subsidence and some general descriptions of benefits of diversions, a specific section of the plan detailing the needs		1

2023 Louisiana Coastal Master Plan Hunter/Anger Scorecard

			for diversions and the necessity of using the Mississippi/Atchafalaya Rivers to rebuild and sustain critical fisheries habitat could help educate the public about the critical need to utilize the freshwater and sediment resources.		
The plan presents a realistic picture of available funding sources.	The plan goes into great detail about current funding sources, listing the expected amounts of funds coming from various sources including from recently-passed federal legislation like infrastructure and hazard mitigation bills. The plan calls for an optimistic \$50 billion in projects over the next 50 years, but is realistic in acknowledging that not all of that funding is secured and additional, broad funding opportunities will				3

2023 Louisiana Coastal Master Plan Hunter/Anger Scorecard

	have to be secured to afford that level of investment.				
The plan maintains, to the extent practicable, a 50-50 balance of investment in storm protection infrastructure and habitat/ecosystem restoration.	The plan does roughly divide the investments of available funds evenly between a variety of habitat restoration efforts like ridge and marsh restoration, marsh creation, diversions, barrier island maintenance and others and physical structures such as levees and floodgates. The 2023 plan also, for the first time, sets aside funds for project maintenance, as well as commits funding to community resilience efforts beyond levees and other physical structures. Also worth noting, the plan takes into				3

2023 Louisiana Coastal Master Plan Hunter/Anger Scorecard

	account available sediment resources.				
The plan presents the worst-case scenarios for coastal communities based on projected sea-level rise and subsidence and paints a clearer picture of future risk.	The plan extensively details worst-case scenarios including multiple maps of anticipated land loss and flood depth risks based on various scenarios of subsidence and sea level rise from minimum sea level rise to maximum sea level rise based on the best available modeling. The maps also go into deep detail about the future risks of land loss and flood risks both without construction of Master Plan projects and with construction. The plan also does an excellent job of detailing the financial impacts and the expected financial losses with				3

2023 Louisiana Coastal Master Plan Hunter/Anger Scorecard

	sea level rise, flooding, storm threats and other environmental conditions.				
The plan was presented to the public with ample opportunity for public engagement and had specific engagement with the sportsmen’s community.	As with past iterations of the Master Plan, the CPRA is to be commended for its outstanding work in engaging with the public to solicit recommendations for the plan and to listen to concerns from various constituents across Louisiana’s coast. As illustrated in the plan and verified through first-hand accounts and public discourse, the CPRA has conducted 60 community briefings with concerned citizens and non-profit organizations, has engaged regularly with the Coastal Advisory Team and Regional Workgroups, has				3

2023 Louisiana Coastal Master Plan Hunter/Anger Scorecard

	spoken about the plan at more than 20 conferences and has conducted multiple regional workshops to discuss the Master Plan modeling and the data viewer tool. The CPRA has also provided consistent engagement with the media regarding the plan and the projects contained. CPRA has engaged directly with sportsmen’s groups, including speaking at the CCA Louisiana State Convention in early March 2023.				
The plan is approved by the CRPA with broad public support					

Score Assessment:

- “A” – 22-27 points
- “B” – 18-21 points
- “C” – 14-18 points
- “D” – 10-13 points
- “F” – less than 10 points

## CPRA Master Plan

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**From:** Bonnie Clements  
**Sent:** Thursday, March 23, 2023 4:06 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment - 2023 Master Plan  
**Attachments:** Comments to Master Plan by Bonnie Clements.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Please see my comprehensive comments attached.

Thank you.

**Bonnie Clements**



The 2023 Louisiana's Comprehensive Master Plan for a Sustainable Coast (4th Edition) presents well as a nice publication but I find it doesn't necessarily reflect what is happening in practice or in reality. My comments address concerns, observations and solutions.

The Master Plan predictions of land loss and storm surge are based off of computer generated models thus the predications could be misleading, as they can be manipulated easily to justify proposed projects. During a community meeting I attended in October, 2022, held by the Louisiana Coastal Protection and Restoration Authority (CPRA), the audience was only presented with compelling, computer generated graphs of what will happen if nothing is done. My impression was these computer generated models were being used to promote fear and perhaps to reduce or even eliminate public comments and inquiries into proposed projects in the Master Plan.

The equal division of the \$50 Billion total budget, which allows for \$25 Billion for Restoration Projects and \$25 Billion for Risk Reduction Projects, seems arbitrary. It is important to note that this grandiose budget does not appear to include common sense ditch clearing, maintenance and widening as needed, to allow for rain and flood waters to flow freely rather than backing up onto private property and roads. The fact that there are multiple federal, state and local agencies and authorities mandated to address sustainable coastal and flood protection further complicates the division of the total budget and allocation of funds. Moreover, the division of the total budget becomes irrational when restoration projects are being compromised or even destroyed by risk reduction projects.

As an example, the \$28M post-Katrina Bayou Bonfouca Marsh Creation project successfully completed will be compromised if not obliterated by the proposed Slidell Levee "risk reduction project" for storm surge protection. Notably, CPRA has acknowledged flooding outside of levees will be increased by virtue of the levees. Federally sponsored by the US Fisheries & Wildlife Service and ironically sponsored locally by CPRA, who supports the Slidell Levee, the Bayou Bonfouca Marsh Creation project created 604 acres of marshland and nourished another 310 acres of marshland with sediment pumped from Lake Pontchartrain. Historic marsh ponds also were restored. The potential obliteration and squander of the \$28M cost of the Bayou Bonfouca Marsh Creation "restoration project" in favor of what seems to be an ill-conceived, very costly "risk reduction" levee project (that won't protect against rain or riverine flooding) defies logic and underscores how economic prudence becomes diminished.

Local parish levee boards appear to be acting on special interests by prioritizing certain projects, without regard to the negative impact on neighboring parishes or even within their own parish. For instance, in order of priority, the breakwater for the Eden Isles subdivision located along Lake Pontchartrain in Slidell, to be funded through the Gulf of Mexico Energy Security Act (Dept. of the Interior), is to be completed before the two other planned breakwaters for the immediate neighboring communities to the west and east of Eden Isles - Carr Dr. and Lakeshore Blvd. - both designed but not funded. Four Board Members for the St. Tammany Levee, Drainage, and Conservation District reside in Eden Isles. The construction of the Eden Isles breakwater likely will cause neighboring communities to experience increased flooding and collection of debris, by pushing additional waters in their direction. These breakwaters ought to be constructed simultaneously, if they are constructed at all. Furthermore, Eden Isles also seeks protection by constructing a levee ring

around its development. This would cause increased flooding of communities outside of the levee. Prioritizing certain projects based on special interests, especially the interests of those in public service, indicates such projects are not taking into account the general public's best interest.

Unified efforts are fundamental to the public's best interests. For example, levees on the south shore and north shore of Lake Pontchartrain would only seem to result in pushing flood waters back and forth between both shores. Working in cooperation and engaging in productive communication about projects in the works needs to be fostered among the various agencies and authorities mandated to address sustainable coastal and flood protection. Evaluating projects before being implemented to assure they will not be counterproductive to other projects is pivotal to the success of flood protection measures.

Viable solutions that benefit everyone must take priority. Barrier island, coastal and marsh restoration through dredging ought to be the highest priority as the first line of defense that has served as the primary protection for flood prone coastal areas for centuries. Once initially restored as needed, periodic restoration maintenance will need to occur. This seems far more effective and practical than the required upkeep of building back up levees as they breakdown, as they do not provide the same widely beneficial flood protection results. Dredging will increase volume capacity for improved water retention in coastal bodies of water and will provide the much needed sediment to restore these crucial areas for lasting sustainability. Also of utmost importance ought to be the re-initiation of the Army Corps of Engineers' Barrier Plan to control flood waters at the Rigolets and Chef Menteur Pass areas for the benefit of all parishes under threat of storm surge flooding. Spending billions of dollars on multiple, localized projects, that in many instances likely will work against each other, is futile if not reckless when clearly viable solutions for the collective good exist.

Finally, among the primary causes of harmful flooding is unbridled development and development destroying wetlands, which need to be eliminated. Eden Isles is just one example of a development utilizing in-fill and concrete pour into what formerly was 5,300-acres of marshland, resulting in millions of dollars of subsequent flood protection costs where the greatest natural resource for flood protection once existed. Common sense development (e.g., low density, raised structures, no concrete slab homes) in environmentally sensitive areas, along with the implementation - once and for all - of a permanent, federal moratorium on development in wetlands, are paramount to protecting against harmful flooding. Without this, the Master Plan merely becomes academic.

Submitted by:  
Bonnie Clements

## CPRA Master Plan

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**From:** Paul, Britt - FPAC-NRCS, LA  
**Sent:** Thursday, March 23, 2023 4:36 PM  
**To:** CPRA Master Plan  
**Cc:** Trahan, Angela - FPAC-NRCS, LA; Boustany, Ron - FPAC-NRCS, LA; McGinnis, Thomas - FPAC-NRCS, LA  
**Subject:** Public Comment  
**Attachments:** NRCS Comments 2023 Master Plan\_20230323\_FINAL.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Please accept the attached NRCS comments on the 2023 Master Plan.  
Thanks,

Britt

\*\*\*\*\*

W. Britt Paul, P.E.  
Assistant State Conservationist/Water Resources  
USDA-NRCS

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March 23, 2023

Mr. Kyle R “Chip” Kline, Jr.  
Coastal Protection & Restoration Authority  
150 Terrace Avenue  
Baton Rouge LA 70802

RE: Master Plan Public Comments - Louisiana's Comprehensive Master Plan for a Sustainable Coast

Dear Mr. Kline:

The Natural Resources Conservation Service (NRCS) commends the State of Louisiana's effort in developing the Draft 2023 Comprehensive Master Plan for a Sustainable Coast (Master Plan) which provides a vision for the coast and commitment to invest in and implement restoration and protection projects. We particularly value the ongoing refinement of the evaluation tools to guide project selection including interactions among projects. We also appreciate the opportunity to participate on the Master Plan's Regional Workgroups and Coastal Advisory Team (CAT). Please consider and utilize the following comments.

### **General Comments**

While it is the State's intent is to prioritize restoration and protection projects based on the best available information and model inputs, the State recognizes that there remains uncertainty as to how our coast will change due to many factors including storm loss. We commend and continue to support more flexibility and willingness to address areas of need including significant storm losses as was the case for Hurricane Ida. More importantly, the CWPPRA agencies, Parishes and local stakeholders have identified many areas outside of the selected polygons that are equally or more critical to restore. We encourage the State to consider additional flexibility with the proposed marsh creation polygons/acres within each basin to allow for project implementation programs like the Coastal Wetlands Planning, Protection and Restoration Act (CWPPRA) to adapt to developing areas of need, especially for areas identified in Implementation Period 2.

To evaluate the long list of potential projects and consider the countless variables and unknowns, the State had to make several decisions and assumptions. The Master Plan does a very good job of documenting and explaining the rationale for such. We commend the State for configuring the Planning Tool to allow borrow from more than one source including from within



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State Office  
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Alexandria, Louisiana 71302  
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*Helping People Help the Land*

Mr. Kyle R “Chip” Kline, Jr.

the system and capture that constraint in the budget rather than eliminating projects based on no sediment sources being available outside the system. This is another example of incorporating flexibility into the plan.

The “Landbridge” project type described in the 2023 Master Plan is an alignment of ridge and marsh creation with some channel maintenance that runs across broken marsh connecting historic ridges. Although similar, this is not a landbridge (or land bridge).

Within coastal Louisiana, a landbridge is an existing geomorphic feature that separates larger water bodies. Landbridge projects have reinforced existing marshes to prevent the coalescing of water bodies. Precedent for the use of this term is in the name of several coastal restoration projects: BA-27a-d Barataria Basin Landbridge Shoreline Protection Phases 1-4, BS-32 Mid Breton Land Bridge Marsh Creation and Terracing, BS-38 Breton Landbridge Marsh Creation (West), ME-19 Grand-White Lakes Landbridge Protection, and PO-169 New Orleans Landbridge Shoreline Stabilization and Marsh Creation. Many project types are utilized to protect landbridges: bank stabilization, marsh creation, shoreline protection, terracing, ridge restoration, and vegetative plantings. There are many instances where projects have been synergistically linked to reinforce a long landbridge. Having duplicated terminology for project types is confusing when evaluating projects and establishing criteria assessments. This conceptual alignment of a constructed strip of ridge and marsh over existing marsh should have a unique name such as Line of Defense Strategy or Critical Landscape Feature Alignment.

NRCS recognizes the success of traditional landbridge projects and the strength in aligning critical feature projects to achieve a greater restoration result; NRCS also commends CPRA for utilizing such a strategy. However, NRCS is concerned that this approach would have unintended consequences on our coastal marsh systems by converting tidal marsh into impounded marsh. Tidal marshes to the north of the alignment will be separated from much of the sustaining processes unless other costly rehabilitation is implemented. The functions and values of these remaining tidal marshes include exchanging water, organic materials, nutrients, and organisms with surrounding estuarine waters. The “Landbridge” alignment could potentially impound tidal marshes to the north (decrease drainage potential and increase water retention), a common unintended consequence of these types of actions (e.g., intersecting canals, flood protection levees, roadways, agriculture parcels, pasture maintenance) thereby reducing water exchange, lowering vegetation productivity, and reduce fisheries ingress/egress, all leading to further deteriorated marshes. Almost every straight-lined polygon of open water in coastal Louisiana started out as an impoundment, either purposefully or unintended. CWPPRA and the restoration community has been fighting against these unintended consequences for their whole existence. NRCS requests that the “landbridge” concept be further evaluated, refined, and realigned to ensure that these unintended consequences are addressed and minimized.

### **Specific Comments**

It is unclear how the Calcasieu – Sabine Large Scale Marsh and Hydrologic Restoration (CS-87) project is considered in the 2023 draft Master Plan. If it is considered in the FWOA condition since it is funded for construction, the marsh creation planned for the Cameron Creole Watershed should be significantly reduced. However, if it is not considered in the FWOA condition and is a feature of the 2023 draft Master Plan, we recommend that the hydrologic features associated with CS-87 also be incorporated into the plan and the modeling.

NRCS supports the goals and stated potential of the Mermentau Basin Hydrologic Restoration project and believes that not only would it result in healthier more sustainable marshes but also could benefit agricultural industries in the area. We value the State’s efforts and encourage the State to continue to work with local stakeholders to find good ecologically sound and balanced solutions including hydrologic management that serves both ecological and economic objectives.

NRCS commends the State’s efforts to define the Eastern Terrebonne Landbridge alignments. We see this as a commitment to developing a restoration plan for the Eastern Terrebonne Basin and look forward to continuing our planning efforts along with the stakeholders to refining this alignment. Unfortunately, the current alignment could be very challenging to design and build due to the deep water, tide currents, and wave energy. Furthermore, much of the area identified consists of relatively stable salt marsh and restorative action would involve mainly nourishment. Perhaps the State should consider more interior alignment to include investments that have already been made through CWPPRA to restore marsh around Catfish Lake and would reduce incidence of impounding additional tidal marsh.

The Mid-Barataria and Mid-Breton Sediment Diversions are included in the Future-Without-Action (FWOA) condition. NRCS has some reservations with including these two projects under this scenario, particularly the Mid-Breton Sediment Diversion which does not have a final Environmental Impact Statement. However, we recognize the need to make decisions that best address future planning efforts. With that said, our comments on previous Master Plan’s regarding existing siphons and diversion remain. We continue to recommend that the State take immediate action to work with local governments and stakeholders to ensure that all existing siphons and diversions be operated as designed and more consistently than in recent years.

The FWOA condition includes the Mid-Barataria Sediment Diversion, which is responsible for creating marsh through sediment deposition within the immediate outfall area. NRCS questions the strategy for including the Large-Scale Barataria Marsh Creation in the outfall of the diversion and accounting for it in the overall budget. We recommend that marsh creation investments be implemented further away from the diversion outfall in areas not influenced by sediment from the diversion.

Although it is identified by the Planning Tool as an Implementation Period 2 project, it is difficult to see the need for the Lower Barataria Landbridge which is currently consists of vast

Mr. Kyle R “Chip” Kline, Jr.

amounts of existing marsh. For future model iterations of the Master Plan, we recommend that the configuration of the Lower Barataria Basin Landbridge be modified to align with the historic Bayou Grand Chenier and the restoration investments currently being implemented in that area. We also recommend that the North Barataria Bay Marsh Creation be shifted west to support the Bayou L’Ours Ridge Restoration and to restore the lake rim structural framework that experienced significant damage and loss due to Hurricane Ida. Establishing this framework could provide opportunities for other funding resources to restore interior landscapes.

The Uhlan Bay Marsh Creation project is within an area influenced by the Bohemia Spillway. Marshes are sustainable in this basin, and new land is forming due to the influence of the Mississippi River through the Spillway. This area would benefit from a less costly alternative of outfall management through improving the ability of the distributary channels such as the Back Levee Canal, Johns Bayou, Grand Bayou, and others.

Hopedale Marsh Creation project area is an isolated area that is protected by the Mississippi River Gulf Outlet spoil bank and the historic Bayou La Loutre Ridge. We recommend this restoration be invested in more vulnerable areas of the basin.

The Chef Menteur Mitigation Bank has been approved by the U.S. Army Corps of Engineers (USACE) to provide mitigation requirements under Section 404 of the Clean Water Act as well as the Louisiana Coastal Resources Program/Coastal Use Permits through the Louisiana Department Natural Resources, Office of Coastal Management. This mitigation bank occurs within the New Orleans East Marsh Creation project area. To date over 500 acres of coastal marsh habitat has been restored and several thousand additional acres are set aside for restoration through that bank < <https://ecosystempartners.com/project/chef-menteur-pass/> >. We recommend that the 500-acre restoration be considered in the Future-Without-Currently-Funded-Projects condition within the 2023 Master Plan. While the remaining restoration is not certain, funding would be limited due to the restrictions that could be associated with the banking requirements. We recommend coordination with the mitigation bank and the USACE.

The marsh creation on the eastern edge of the Biloxi marshes (i.e., Three Mile Pass MC and HR) will be very challenging to design and build due to the deep water, tide currents, and wave energy. The vulnerability of that restoration is also a concern.

Thank you for the opportunity to comment on the 2023 Draft Master Plan. NRCS looks forward to continued participation on the CAT and Regional Workgroups as the State moves forward with implementation. Please contact me (318-473-7756) if you have questions regarding these comments.

Sincerely,

W. Britt Paul, ASTC (WR), NRCS, SO, Alexandria, LA

## CPRA

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### Master Plan

**Sent:**  
**From:**  
**To:**  
**Subject:**

Polly Glover  
Friday, March 24, 2023 9:46 AM  
CPRA Master Plan  
Polly Glover shared "Document 8" with you.

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.



## Polly Glover shared a file with you

Masterplan Team Please see the enclosed link with comments on the 2023 Masterplan. Thanks Polly Glover



Document 8.docx

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March 24, 2023

Coastal Protection Restoration Authority

Masterplan 2023 Committee

This letter is being written in support of the 2023 Masterplan that is presently up for public comment. Thank you for giving me the opportunity to provide my views.

As a life long conservation advocate who has worked for decades to bring awareness on all levels to our unique and dire wetlands crisis I am happy to support the 2023 plan. After attending public meetings statewide, reading and reviewing the plan both online and in the paper version it appears that we finally are taking a more regional approach to addressing the land changes that occurring. Recognizing the need for a regional approach shows that we know each area has their own set of unique needs and potential challenges that cannot be approached with a one size fits all point of view. The plan also addresses the challenges we are facing with climate change and the scenarios which are ever changing with those impacts from it.

I would however like to request that the CPRA continues to push for future funding mechanisms to keep our barrier islands intact. Those islands work not only as our first line of defense from storms but also work to provide habitat and critical protection of our rapidly eroding interior wetlands.

Thank you for the effort put in by the team on this plan and thank you for all the efforts that you do to provide protection of our wetlands for our citizens.

My best,

For our Coast

Polly Glover

## CPRA Master Plan

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**From:** Martin Landrieu  
**Sent:** Friday, March 24, 2023 10:01 AM  
**To:** CPRA Master Plan  
**Subject:** Comment to Draft Coastal Master Plan

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

I am writing to support the Master Plan, and the Master Plan process. The process appears to be publicly informed and grounded in the best available science. It balances coastal restoration with protection and is realistic about the challenges we face.

To secure a sustainable future for coastal Louisiana, we need to continue to use the land-building power of the Mississippi River to the greatest extent possible. I am encouraged to know that sediment diversions from previous Coastal Master Plans are moving forward to construction. Projects like the Mid-Barataria Sediment Diversion and the Mid-Breton Sediment Diversion are crucial to both building and maintaining land as well as protecting investments made in levees and other protection projects. I urge the state to advance these projects as quickly as possible.

It goes without saying that Louisiana needs to put its existing funding resources to work wisely – and quickly – and secure additional resources to maintain as much of our coast as possible. The Master Plan addresses our resource limitations by prioritizing projects that will have the greatest impact and save the most land over time.

Thanks You.

**Martin E. Landrieu**

## CPRA Master Plan

---

**From:** Emily Vuxton  
**Sent:** Friday, March 24, 2023 10:36 AM CPRA  
**To:** Master Plan  
**Subject:** Public Comment  
**Attachments:** TNC Master Plan Public Comments.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Hello,

Please see attached for The Nature Conservancy's comments on the Master Plan.

Thank you,  
Emily

**Emily Vuxton**  
**Director of External Affairs**

[nature.org/louisiana](https://nature.org/louisiana)

**The Nature  
Conservancy of  
Louisiana**  
205 N. Fourth St.  
Baton Rouge, LA 70801



Coastal Protection & Restoration Authority (CPRA)  
Re: Public Comments –2023 Coastal Master Plan  
150 Terrace Avenue  
Baton Rouge, LA 70802

Dear CPRA,

Thank you for the opportunity to comment on the 2023 Coastal Master Plan.

The Nature Conservancy (Conservancy) is a global environmental non-governmental organization with the mission to conserve the lands and waters on which all life depends. With the support of more than one million members globally, the Conservancy has protected more than 120 million acres of land, 5,000 river miles and currently manages more than 150 marine conservation projects around the world. Across 79 countries and all 50 states in the U.S, the Conservancy has been working to conserve, protect, and restore coastal and marine habitats and species for over four decades. We use a science-based and consensus-oriented approach to find solutions that are good for people and nature. In Louisiana we have worked with public and private partners to conserve over 300,000 acres of important habitats.

We congratulate CPRA on its completion of the 2023 Coastal Master Plan (CMP). The Plan continues to use world class science and modelling to create action for coastal restoration and protection that serves as a model for the rest of the world. TNC is proud to serve as a key partner to CPRA in achieving systems-scale restoration along the coast of Louisiana. We believe that CPRA has created a rigorous, scientifically defensible plan that has incorporated significant community feedback and outreach. CPRA can be proud of its efforts.

We have included comments, section by section, to the plan below.

### INTRODUCTION

The introduction serves as an excellent primer for individuals to gain an understanding of where we have been, as well as the stage setting for how we reached the current point we are at. We believe a similar introduction should be included in all iterations of the CPRA Annual Plan, as new individuals will continue to engage with CPRA planning documents in the interim years between the release of new Coastal Master Plans.

### UNDERSTAND

The understand section builds on the primer offered in the introduction to expand on the work done not just by CPRA but by other public, private and community entities to build and contribute to the plan. Additionally, a basic explanation of the modelling done in the Master Plan is important for readers to understand the underpinnings of the plan.

### PREDICT

We believe the predictive models are a meaningful way to both plan for the future of the coast and can be a valuable tool in communicating with stakeholders on real and anticipated threats and outcomes. While modeling is an excellent tool, we encourage as much explanation around what is expected against what has been observed to strengthen public understanding and acceptance in the use and adaptability of models.

### EVALUATE

In many ways, the evaluate section is the heart of the plan. It offers a scientifically defensible way of determining the best investments for protecting and restoring our coast. It also offers a clear description of different project types, which is helpful for individuals new to the plan and coastal restoration and protection in general. The visualizations in this section are also very clear and helpful and should be used in future presentations to stakeholder groups to illustrate the types of projects CPRA constructs and operates.

### TAKE ACTION

The take action section is very comprehensive and serves as a great guide for individuals seeking to understand the projects that are being undertaken in their area. The future with and without action maps, perhaps the most used images from every master plan, will be important for communicating the need for urgent action.

There is still an ongoing need within CPRA to more fully define and build out its work in nonstructural protection. The plan allocates \$11.2 billion to nonstructural measures yet notes that the “CPRA does not traditionally implement these project types. One exception is the USACE Southwest Coastal Louisiana project.” If CPRA does not and does not plan to implement these projects, it is puzzling what exactly \$11.2 billion dollars is going to be spent on. Considering that this is a little under half of the protection budget it is confusing where this number originated from if there are no, or few, projects defined for it. We request that CPRA continues to report on this pot of money and what it is intended for if funds should become available.

We appreciate the description of the different funding sources that are currently funding the plan. As CPRA hits its “fiscal cliff” we believe that it is important for CPRA to continue to advocate for new funding for the plan (including the possible passage of the RISEE and BREEZE acts) as well as engage private industry and stakeholders to make them collaborative partners in determining how we will continue to fund the plan.

### REGIONAL APPROACH

This section is essential because it provides an easy breakdown for parish officials and other stakeholders who are solely interested in what is occurring in specific areas of the coast. It would likely be helpful to these individuals to have these regional overviews turned into one or two paggers that could be used for outreach.

### BEYOND THE MASTER PLAN

We appreciate the inclusion of several important initiatives that TNC is involved in this section, including the Atchafalaya Basin Program and the Climate Initiatives Task Force. We continue to support the East Grand Lake project. We also encourage the inclusion of the Atchafalaya National Estuarine Research Reserve into future plans as many of the core science and monitoring programs required by Reserves will support coastal restoration aims. We also thank you for inviting us to participate on the Coastal Advisory Team.



**The Nature Conservancy in Louisiana**  
PO Box 4125  
Baton Rouge, LA 70821  
225-338-1040 | LAFO@tnc.org

In summary, we congratulate you and thank you for your work on this ambitious plan. We look forward to supporting its passage through the legislature this spring session.

Sincerely,

A handwritten signature in blue ink that reads "Karen Gautreaux".

Karen Gautreaux  
Louisiana State Director

## CPRA Master Plan

---

**From:** Trail, Kristi  
**Sent:** Friday, March 24, 2023 10:41 AM  
**To:** CPRA Master Plan  
**Subject:** Comments on 2023 Draft coastal master plan  
**Attachments:** CMP\_CommentLetter\_2023.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Attached please find comments from Pontchartrain Conservancy on the Draft 2023 Comprehensive Master Plan for a Sustainable Coast.

Thank you,  
Kristi

-----

Kristi L. Trail, P.E.

Executive Director

Pontchartrain Conservancy



## [OFFICERS]

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**Kristi Trail**  
*Executive Director*

March 24, 2023

Mr. Kline, Chairman CPRA Board  
Mr. Haase, Executive Director  
Coastal Protection and Restoration Authority  
150 Terrace Ave.  
Baton Rouge, LA 70802

## **Re: Comments on the Draft 2023 Comprehensive Master Plan for a Sustainable Coast**

Dear Chairman Kline and Mr. Haase,

At Pontchartrain Conservancy (PC), our mission is to drive environmental sustainability and stewardship through scientific research, education, and advocacy. PC's policies and advocacy are grounded in science and it is for this reason that we respectfully urge you to consider these comments regarding CPRA's Draft *2023 Louisiana's Comprehensive Master Plan for a Sustainable Coast* (2023 CMP).

First and foremost, CPRA is to be commended on the plan as a whole. The CMP is years in the making and requires painstaking levels of detail and focus to complete such an enormous plan. Furthermore, PC is encouraged that the CPRA takes stakeholder comments into consideration as each plan iteration develops. For example, in 2017 PC championed the idea that subsidence rates were likely lower in certain parts of the coast than reflected by the 2012 and 2017 subsidence maps. The reinspection and adjustment in subsidence rates by Fitzpatrick et al. for the 2023 CMP made it possible that Biloxi Marsh and Chandeleur Islands/Sound restoration projects be reconsidered. As a result, restoration in Biloxi Marsh and Chandeleur Sound is now reinstated in the 2023 CMP. This example demonstrates the iterative process that gives the CMP one its greatest strengths, it evolves as the scientific process continues.

It is a spectacular achievement for the state to have both Mid-Barataria and Mid-Breton Sediment Diversions moving forward. Additionally, the level of projected funding for in FYs 2023, 2024 and beyond is allowing a

## [NEW CANAL LIGHTHOUSE]

**Education, Development & Outreach**  
8001 Lakeshore Dr.  
New Orleans, LA 70124

## [MAILING ADDRESS]

P.O. Box 6965  
Metairie, LA 70009  
504.836.2215 | ScienceForOurCoast.org

## [CORPORATE OFFICE]

**Coastal, Water Quality & GIS**  
3501 N. Causeway Blvd. Suite 220  
Metairie, LA 70002



breakneck pace for project construction that is thrilling to witness. However, there are a number of concerns with regard to the 2023 CMP that CPRA should address in the final version related to sediment diversions and ridge restoration. The Central Wetlands Diversion is the only named and planned diversion in the 2023 CMP, and our opinion is that the state is missing a valuable opportunity to capitalize on the recent wins with Mid-Barataria Sediment Diversion. Mostly, by listing diversions as “programmatic” the distinction could cause support for diversions to wane over the years before the next plan. Additionally, the one named diversion in the CMP 2023 (Central Wetlands Diversion) is only 5000 ft<sup>3</sup>/s and will only benefit an area within the Hurricane and Storm Damage Risk Reduction System (HSDRRS) and thus will not build land outside HSDRRS. Land building and maintenance with a diversion should be prioritized outside HSDRRS. This project should be excluded from the 2023 CMP. Alternatives already exist that can benefit the Central Wetlands (e.g. Violet Siphon) and these should be used and potentially expanded before valuable time and resources are spent on a new diversion. Furthermore, the decision to exclude sediment diversion project candidates and change sediment diversions to “Programmatic” warrants further explanation.

Another concern is in regards to ridge restoration projects. The lack of these projects in the Pontchartrain Basin is unfortunate. This is especially curious given the numerous marsh creation projects beyond implementation year 20 in the vicinity of natural ridges (e.g. Carlisle and Bayous La Loutre and Terre-Aux-Boeuf). Although clearly CPRA must balance objective project selection criteria, this issue is pressing nonetheless because ridges are a valuable habitat type that are left out of the Pontchartrain Basin in the 2023 CMP. CPRA should reconsider adding this project type back to the Pontchartrain Basin’s suite of projects.

CPRA is to be applauded for its forward thinking and inclusion of the final chapter of the CMP “Beyond the Master Plan”. However, a few comments should be considered within this section. CPRA should take a more direct approach in confronting an issue that needs more attention, which is more stringent development practices along the Northshore of Lake Pontchartrain. The lack of unified standards for building elevation/flood proofing across communities and the ability of developers and local agencies to side-step existing codes warrants discussion. Especially in light of the fact that CPRA develops community vulnerability indices for Louisiana, it seems prudent to take a more deliberate stance on informing communities about their changing risks as individual development projects take shape. Specifically, CPRA’s Coastal Use Permit and consistency with the CMP authority can directly confront projects that have detrimental impacts on community vulnerability. CPRA should utilize its existing regulatory authority and play a more active role in the permitting process with regard to development projects that negatively influence community vulnerability.

Harnessing the Mississippi River’s resources is a key way in which Louisiana’s coast will be sustainable through the 21<sup>st</sup> century and beyond. That said, CPRA should add additional language to the section “Lowermost Mississippi River Management Program” that highlights strategies for CPRA to capitalize on rapidly evolving situations (e.g. Mardi Gras and Neptune Passes). For example, Mardi Gras

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Pass is building wetlands on the east bank of the river within the footprint of the Uhlman Bay Marsh Creation project. Thus, the Uhlman Bay Marsh Creation project is essentially not needed because the entire project area is either newly emergent wetlands or under the influence of Mardi Gras Pass water and sediment discharge. Removing this project from the CMP entirely is the best course of action given these recent developments. Similarly, Neptune Pass's recent expansion is leading to land growth. This is a space that CPRA can elaborate on how it will manage emerging situations. CPRA can capitalize on opportunities to harness river resources. Adaptively managing situations like Mardi Gras and Neptune Passes should be a priority for CPRA.

We would like to thank you and your organization for your continued partnership and support of our organization and our work.

Sincerely,



Kristi Trail, P.E.  
Executive Director

[NEW CANAL LIGHTHOUSE]

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New Orleans, LA 70124

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Metairie, LA 70002

## CPRA Master Plan

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**From:** joseph.orgeron  
**Sent:** Friday, March 24, 2023 1:04 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comments -- From Restore Or Retreat  
**Attachments:** RoR 2023 Master Plan Comments\_20230324.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Please see the attached PDF with Restore Or Retreat's official comments for the 2023 Master Plan.

Thanks and regards,  
JoeO



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**Joseph Orgeron, Ph.D.**  
Executive Director, Restore or Retreat, Inc.  
o: 985-448-4485 |  
[Joseph.Orgeron@Nicholls.edu](mailto:Joseph.Orgeron@Nicholls.edu)  
[RestoreOrRetreat.org](http://RestoreOrRetreat.org)



P.O. Box 2048-NSU · Thibodaux, Louisiana 70310 · (985) 448-4485 · Fax (985) 448-4486  
Joseph.Orgeron@Nicholls.edu · [www.RestoreOrRetreat.org](http://www.RestoreOrRetreat.org)

**March 24, 2023**

**Coastal Protection and Restoration Authority**

P.O. Box 44027  
Baton Rouge, LA 70804

**Re: Restore or Retreat's Comments on 2023 Master Plan**

**Dear Master Plan Committee:**

Restore or Retreat (RoR) is a non-profit coastal advocacy group created in 2003 by coastal Louisiana residents and stakeholders who recognize that the Barataria and Terrebonne basins are simultaneously the two most productive as well as rapidly eroding estuaries on earth. For the residents of the Lafourche and Terrebonne areas, this erosion represents an economic and ecological crisis. With a growing membership of businesses and individuals, RoR seeks to identify and expedite the implementation of aggressive, large-scale restoration projects to protect this irreplaceable region. In addition to co-hosting a Lower Lafourche community engagement roundtable in November 2022 and attending the January public hearing held in Houma, RoR would like to respectfully submit the following additional comments regarding the 2023 Louisiana Comprehensive Master Plan for a Sustainable Coast, 4<sup>th</sup> Edition.

First, let us begin by thanking you for your past work in the Barataria and Terrebonne Basins, including the recent completion of work along both sides of Bayou Lafourche and the Caminada Headlands. We look forward to construction beginning on the Mid-Barataria Landbridge - West Project (326b) and other major projects like Eastern Terrebonne Landbridge - East (335d); we would like to see these important projects moving forward soon. RoR would like to also continue partnering with you on outreach related to all the projects in the Barataria & Terrebonne Basins so that we can ensure cooperative implementation from all concerned stakeholders.

***Continued Importance of the Master Plan***

We stand with you in recognizing one of the most significant and urgent issues facing our state is the loss of our coast, especially with our organization based in the epicenter of that loss. We believe that sense of urgency is appropriately reflected in the reconfiguration and prioritization of how projects advance over time, including and especially, the critical first 10-year implementation period.

We are also supportive of the prioritization of projects from currently allocated funds, regardless of implementation period. We believe this would allow the local, state, and federal partners to best leverage any potential funding sources made available and even encourage those partners to seek additional new funding sources.

***Funding the Master Plan***

Although funding the Master Plan remains outside the scope of this comment document, we would like to underscore the need to develop additional and dependable revenue streams and cost saving opportunities by the state and its partners, such as bonding and creative financing for projects, to fund the Master Plan in its entirety. Funding streams associated with the 2010 Deepwater Horizon tragedy provide us with a steady stream of one-time only funding through 2032, but we should capitalize on that momentum to generate the capital needed to fund the program in its entirety as best as possible. To this end, RoR is in full support of efforts currently underway in the US Congress to increase GOMESA revenue from OCS offshore energy production as well as initiative to supplement funding with additional state level dedications from offshore renewable revenue.

***Project Specifics***

Overall, we believe the state should continue to prioritize for large-scale restoration projects first, so they can have a greater impact over time and support investments made in other restoration and risk reduction projects. We also believe to secure a sustainable future for coastal Louisiana, we need to use the land building power of the Mississippi and Atchafalaya Rivers to the greatest extent possible. The state should explore leveraging the land building powers of these rivers on an even greater scale in future versions of the Master Plan, and we look forward to seeing even more of this freshwater and sediment captured in future iterations of the Master Plan.

With that said, we are encouraged to see diversions remain a cornerstone of the master plan, including the Mid-Barataria Sediment Diversion, as we believe this is crucial to both building and maintaining land and protecting investments made in levees and other protection projects. In addition to diversions, Louisiana's land loss crisis requires a comprehensive suite of restoration projects, including barrier islands, marsh creation, hydrologic restoration, ridge restoration, shoreline protection and oyster reef restoration. We support continued barrier island and headland restoration and maintenance, an important component of our coastal restoration toolkit that should be prioritized and funded going forward. We are also grateful to see in the inclusion of extensive marsh creation south of Golden Meadow to provide additional protection to this community's ring levee system which performed so well for hurricane Ida. Marsh restoration in this area provides a tremendous amount of protection for those within the Larose to Golden Meadow system, as well as the people of the Terrebonne Basin when storms approach our coast.

In conclusion, we acknowledge the hard work of the many team members who worked countless hours on this commendable effort, and we look forward to continuing to work with the State to further refine our Master Plan and its future iterations. Thank you for your time and for the opportunity to submit these comments.

Sincerely,



**Joseph A. Orgeron, Ph.D.**

Executive Director

Restore or Retreat, Inc.

## CPRA Master Plan

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**From:** Don Caffery  
**Sent:** Friday, March 24, 2023 2:05 PM  
**To:** CPRA Master Plan  
**Subject:** 2023 Coastal Master Plan - Public Comments  
**Attachments:** CMP Comments (2023).pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Good Afternoon:

I have attached a public comment to the 2023 CPRA Coastal Master Plan on behalf of the Natural Resources Management Association.

Please contact me if I can provide any additional information.

Sincerely,

Don

--

Don Caffery

543 Spanish Town Road  
Baton Rouge, Louisiana 70802  
Office: (337) 761-6627





March 24, 2023

Coastal Protection and Restoration Authority  
Master Plan Public Comments  
50 Terrace Avenue  
Baton Rouge, Louisiana 70802

*Sent Via Email: [masterplan@la.gov](mailto:masterplan@la.gov)*

To Whom It May Concern:

The Natural Resources Management Association (“NRMA”) and its members represent approximately two million acres of coastal wetlands in the Coastal Zone. Decades of ownership and management experience paired with local knowledge allows NRMA members to capitalize on opportunities to plan and implement conservation projects and administer best management practices for wildlife. Stewardship of these diverse habitats and natural resources is one of our primary objectives.

NRMA supports the Coastal Protection and Restoration Authority (“CPRA”) efforts to benefit coastal residents, communities, and economies. NRMA submits the following comments on behalf of its members:

### **STRATEGIC PLANNING & A PART OF THE SOLUTION**

NMRA commends CPRA for its efforts and implementation of restoration projects since its inception in 2005. The collective time commitment is an asset that cannot be overlooked. However, property owners are underutilized by CPRA. NRMA believes local knowledge provided by property owners is critical to the success of future restoration planning efforts.

CPRA cites citizens and communities, academia, governments, industry, non-profits and non-governmental organizations, and professional networks as “Coastal Partners.” CRPA does not cite the private property owners upon which many of its projects occur as partners; instead, we are viewed as a stakeholder with a limited role on an advisory commission.

NRMA suggests that property owners are not stakeholders - we are, and should be considered, dedicated and necessary partners. Property owners have an unrivaled historical knowledge of coastal processes and could be a tremendous asset in the planning, development, and implementation of projects. CPRA should engage property owners as necessary partners as early as possible, as this would ensure projects respect private property rights and the potential benefits derived or credited therefrom.

The 2023 Master Plan is a step in the right direction. Additionally, it incorporates plans established at the parish level that address regional restoration techniques. NRMA supports these plans and suggests they receive adequate acknowledgment and consideration as part of the overall plan process moving forward. We appreciate CPRA's efforts to identify those differences and encourage the continued use of science and site-specific analysis during the planning, development, and evaluation process.

### **A HISTORY OF CHANGE**

NRMA members have managed property for generations. We suggest a history of private property ownership and stewardship could complement this section of the Master Plan, as private property rights are acknowledged throughout Louisiana law. NRMA is available to assist with the drafting or development of that content for this, or any future, Master Plan.

On behalf of the NRMA, we applaud the collective effort to assemble the 2023 Louisiana Comprehensive Master Plan. We look forward to working together as we build a more resilient and sustainable coast.

Sincerely,



Donelson T. Caffery III  
President, NRMA



## CPRA Master Plan

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**From:** Scott Eustis  
**Sent:** Friday, March 24, 2023 2:08 PM  
**To:** CPRA Master Plan  
**Subject:** 2023 Healthy Gulf individual climate impacts comment on air permit consistency review  
**Attachments:** Louisiana Petrochemical Emissions Contribution to State Wetlands Loss.xlsx; 2023 Healthy Gulf individual climate impacts comment on air permit consistency review.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

I am sending this comment as a supplement to the larger Healthy Gulf comments. Here, items are repeated, but worksheets and methods are attached.

I request a meeting with CPRA concerning consistency review processes, specifically consistency review for these and other air permits. Please contact me at [scotteustis@healthygulf.org](mailto:scotteustis@healthygulf.org), 504 237 0323.

Louisiana Petrochemical Emissions Contribution to Global Emissions and State Wetlands Loss

EDIT the cyan cel with the AI Number, and permitted CO2e number							
AI	138,781,285			time frame			
				1990-2018	2018	1930 - 1990	2017-2067
				0.18			
				0.041			
						0.79	
						0 percent increase	
						0 percent of new total	
Proposed Facility MTCO2e / yr							



935 Gravier St, STE 700  
New Orleans, LA 70112

Coastal Protection & Restoration Authority  
Master Plan Public Comments  
150 Terrace Avenue  
Baton Rouge LA 70802  
[masterplan@la.gov](mailto:masterplan@la.gov)

**Friday, March 24, 2023**

I am sending this comment as a supplement to the larger Healthy Gulf comments. Here, items are repeated, but worksheets and methods are attached.

I request a meeting with CPRA concerning consistency review processes, specifically consistency review for these and other air permits. Please contact me at [scotteustis@healthygulf.org](mailto:scotteustis@healthygulf.org), 504 237 0323.

Louisiana is disappearing, disintegrating from the inside out. CPRA had very high ambitions in 2007 and especially after 2012, and has achieved much, given it was given the Authority to tackle the conflicts between state agencies –levee districts, the department of transportation, as well as Office of Coastal Management decisions on wetlands.

**In 2023, we need CPRA to extend consistency review to LDEQ Air Permits for major petrochemical facilities–facilities that would be included in the EPA's FLIGHT data as major carbon dioxide polluters.**

In 2012, Native leaders like Chief Thomas Dardar and Elder Rosina Philippe were on the cover of the Louisiana Coastal Master Plan document. In 2020, Elder Rosina<sup>1</sup> petitioned the UN on the matter that Louisiana was committing forced displacement due to its lack of action on climate action. Although CPRA has been in discussion with Grand Bayou Atakapas / Ishak Chawasha, there remains much more to be done.

The Governor's Climate Task Force has described the impacts of climate change, on our wetlands, as well as a bare minimum of hope for our coast, our food, and our shelter. CPRA has a unique authority to incorporate the science of the task review climate emission permits that significantly impact its projects<sup>2</sup>.

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<sup>1</sup> ■ 2020 Louisiana Native UN Complaint Final abridged Grand Bayou.pdf  
[https://drive.google.com/file/d/1ciM08oDm5gEPHljK01pQGO3SnKz\\_uJ0V/view?usp=sharing](https://drive.google.com/file/d/1ciM08oDm5gEPHljK01pQGO3SnKz_uJ0V/view?usp=sharing)

<sup>2</sup> RS 49:214.3.1(B)(2)(d) Review and modify proposed coastal use permits prior to issuance to the extent that such permits would authorize activities which significantly affect integrated coastal protection projects or which significantly diminish the benefits of projects intended to protect, conserve or enhance coastal



935 Gravier St, STE 700  
New Orleans, LA 70112

***The impacts to people being felt today in Louisiana include direct physical, mental, and financial tolls from extreme weather and indirect impacts to social systems and infrastructure that is struggling to cope with the increasing prevalence and severity of natural disasters. As is the case globally, Louisiana's low-income communities, communities of color, Indigenous people, and other marginalized residents are being hit especially hard because they are more likely to live in areas vulnerable to extreme weather and are typically less financially able to take on the economic challenges of recovery or relocation. These groups have been excluded from the opportunity to build wealth for generations, are more likely to live and work in overburdened communities, are more likely to live in areas with higher flood risk, and are more likely to experience insufficient or delayed investments in infrastructure and disaster recovery efforts.***<sup>3</sup>

Despite the goals of the LA Climate Task Force, Large Petrochemical facilities would increase Louisiana's major 2018 GHG emissions<sup>4</sup> by tens of percentage points, and comprise over twenty percent of those new industrial and power emissions.

Louisiana's petrochemical emissions, such as the Proposed Formosa Plastics Plant ("aka FG LA"), and the emissions from LNG exports, are large enough to impact coastal wetlands around the world. Formosa's permitted (not lifecycle) emissions are over 13MT CO<sub>2</sub>e<sup>5</sup>, representing 8.9% of Louisiana's 2018 emissions.. They will certainly affect CPRA's coastal projects. The new Ammonia facilities (Air Products, Nutrien, CF Industries, etc) proposed for "Carbon Capture" will also be major sources of carbon dioxide **increases** in the state, despite the deceptive branding. LNG Export proposals are numerous in the Coastal Zone, and 10<sup>6</sup> of these projects would emit over 67 MT CO<sub>2</sub>e annually for the next 50 years.

Petrochemical plants constituted 79%<sup>7</sup> of Louisiana's industrial and power emissions, as of 2018. Louisiana is 4.1% of USA emissions (1990-2018)<sup>8</sup>, and USA emissions are roughly 18% of Global emissions (1990-2018)<sup>9</sup>. Assuming these trends stabilize or worsen, which seems

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areas and to require the issuance of permits for public or private integrated coastal protection projects or plans. <https://www.legis.la.gov/legis/Law.aspx?p=y&d=672063>

<sup>3</sup> Louisiana Climate Action Plan, 2022, page 19, "The Risks of Inaction"

<sup>4</sup> Data Extracted from EPA's FLIGHT Tool (<http://ghgdata.epa.gov/ghgp>)

<sup>5</sup> Doc 11454855 <https://edms.deq.louisiana.gov/app/doc/view?doc=11454855>

<sup>6</sup> 99407 Cameron LNG LLC - Cameron LNG Facility, 119267 Sabine Pass LNG LP - Sabine Pass Liquefaction LLC, 185639 Magnolia LNG LLC - Magnolia LNG Facility, 191665 Cheniere Energy Inc/Sabine Pass LNG, 194203 Venture Global Calcasieu Pass LLC - Calcasieu Pass LNG Project, 197379 Venture Global Plaquemines LNG LLC - Plaquemines LNG Project, 201334 Driftwood LNG LLC, 218335 Venture Global Delta LNG LLC - Delta LNG Project, 221642 Commonwealth LNG LLC - Commonwealth LNG & Pipeline Project, 232172 Venture Global CP2 LNG LLC - CP2 LNG Terminal

<sup>7</sup> Louisiana Climate Action Plan, 2022, page 11, Figure 4.

<sup>8</sup> Louisiana 2021 GHG Inventory. Prepared on behalf of the Governor's Office of Coastal Activities David E. Dismukes, Ph.D., LSU Center for Energy Studies

[https://www.lsu.edu/ces/publications/2021/louisiana-2021-greenhouse-gas-inventory-df-rev\\_reduced.pdf](https://www.lsu.edu/ces/publications/2021/louisiana-2021-greenhouse-gas-inventory-df-rev_reduced.pdf)

<sup>9</sup> EDGAR average over six time series, 1990 - 2018 to match the Dismukes analysis.

[https://edgar.jrc.ec.europa.eu/country\\_profile/USA](https://edgar.jrc.ec.europa.eu/country_profile/USA)



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New Orleans, LA 70112

likely, Formosa's emissions are  $0.0892 * (0.8 * 0.79 * 0.041 * 0.18)$  of global emissions. If global sea level rise is responsible for 80% of relative water rise across the state,<sup>10</sup> Formosa is thus, at least, liable for  $0.0892 * (0.00466416)$  of the wetlands lost via changed climate forces.

Similarly, LNG plants will emit 67 MT CO<sub>2</sub>e, over the next 50 years, according to a review of LDEQ AIs listed. This represents a 48% increase. And makes LNG companies liable for  $(0.3277 * 0.00466416)$  of the wetlands lost via changed climate forces –many of which are wetlands restored as CPRA projects.

There are thousands of acres of wetlands drowned because of the Fossil Gas plants we have. We can't afford any more wetlands for fossil fuel plants. Even in the 1990s, sea level rise was visible as regional waterlogging in the lower Barataria Terrebonne Estuary, and at 21,069 acres according to the USGS evaluation of Deltaic wetlands loss<sup>11</sup>. Even if we froze our projection of the impact of the heating, rising sea at this time scale, **Formosa, at 8.9%, would still be liable for some 8.77 acres of land loss, even if sea level rise does not increase at all.** LNG export proposals would be liable for **32.21 acres**.

These are already large impacts, under the LDNR OCM NAJ guidelines<sup>12</sup>. These impacts require avoidance and mitigation, assuming no increase in sea level rise.

In the future, the vast majority (75%, or 3,090 square miles / 1.977 million acres, according to LA CPRA<sup>13</sup>) of the loss of up to another 4,120 square miles<sup>14</sup> of coastal wetland can be attributed to sea level rise from Formosa's and other's CO<sub>2</sub>e pollution.

Formosa's 8.9% of 80% of 79% of 4.1% of 18% of 3,090 square miles is 1.28 square miles or **823 acres of land lost to the Gulf**, from the water increasingly swollen by Formosa's carbon pollution. As we doubt Formosa will be in operation through 2067, to sustain 8.9% of state emissions, so the acreage of wetland loss from the Formosa plant lies somewhere in between—but it is not zero. On the other hand, LNG Export proposals have all announced that

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<sup>10</sup> August 3, 2016, Governor's Advisory Commission on Coastal Protection, Restoration, and Conservation August 3, 2016 - 2017 Coastal Master Plan Planning for an Uncertain Future 2017 Coastal Master Plan\_GAC\_8-3-1 - Karim Belhadjali.pdf at <https://cims.coastal.louisiana.gov/recorddetail.aspx?root=0&sid=18787>

<sup>11</sup> Process Classification of Coastal Land Loss between 1932 and 1990 in the Mississippi River Delta Plain, Southeastern Louisiana She Penland, Department of Geology and Geophysics, University of New Orleans, New Orleans, LA 70148 <https://pubs.usgs.gov/of/2000/of00-418/ofr00-418.pdf>

<sup>12</sup> [http://data.dnr.louisiana.gov/ABP-GIS/ABPstatusreport/NAJ\\_Combined\\_Document\\_5\\_10\\_2013.pdf](http://data.dnr.louisiana.gov/ABP-GIS/ABPstatusreport/NAJ_Combined_Document_5_10_2013.pdf)

<sup>13</sup> "Haase said state land-loss modeling concluded that 75% of the marsh loss [modeled from 2017 to 2067] was attributed to rising water levels" "We're screwed": The only question is how quickly Louisiana wetlands will vanish, study says BY MARK SCHLEIFSTEIN | STAFF WRITER PUBLISHED MAY 22, 2020 AT 1:00 PM

[https://www.nola.com/news/environment/article\\_577f61aa-9c26-11ea-8800-0707002d333a.html](https://www.nola.com/news/environment/article_577f61aa-9c26-11ea-8800-0707002d333a.html)

<sup>14</sup> <https://coastal.la.gov/whats-at-stake/a-changing-landscape/>



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New Orleans, LA 70112

their project life is 50 years<sup>15</sup>. Therefore, the Louisiana wetlands drowned by LNG Export CO<sub>2</sub>e is closer to  $(0.3277 * 0.00466416 * 3090) = 4.72$  square miles, or **3,023 acres**.

This is a crisis. The full police power of the state shall be exercised to address the loss and devastation to the state and individuals arising from hurricanes, storm surges and flooding and to address the rapid, ongoing, and catastrophic loss of coastal Louisiana in order to devote the maximum resources of the state to meet these immediate and compelling public necessities of integrated coastal protection. (La R.S. 49:214.5.6)

***CPRA must describe the acres of wetlands drowned from by major carbon polluters over the current planning period before any air permit can be issued.*** LDEQ cannot permit this air pollution, which erases Louisiana from the map, until such an assessment is completed.

For a healthy Gulf,

A handwritten signature in black ink, appearing to read "Scott Eustis", written over a light gray background.

Scott Eustis  
Community Science Director  
Healthy Gulf, 935 Gravier Ste 700  
New Orleans, LA 70112

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<sup>15</sup> Elizabeth Dolezal, VP of Regulatory Affairs, personal communication, CP2 LNG Hearing, Vinton, LA, 2023

## CPRA Master Plan

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**From:** Doug Daigle  
**Sent:** Friday, March 24, 2023 3:16 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment Draft 2023 CMP - Louisiana Hypoxia Working Group  
**Attachments:** LHWG Public Comments on 2023 Draft La CMP.docx

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Attached please find comments on the Draft 2023 Comprehensive Master Plan for a Sustainable Coast from the Louisiana Hypoxia Working Group.

Sincerely,  
Doug Daigle  
Louisiana Hypoxia Working Group  
Room 1197  
Energy, Coast, & Environment Building  
Louisiana State University  
Baton Rouge, LA 70803

**Louisiana Hypoxia Working Group  
Room 1197  
Energy, Coast, & Environment Building  
Louisiana State University  
Baton Rouge, LA 70803**

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March 24, 2023

Coastal Protection & Restoration Authority  
Master Plan Public Comments  
150 Terrace Avenue  
Baton Rouge LA 70802

The following comments on the 2023 Draft *Comprehensive Master Plan for a Sustainable Coast* on behalf of the Louisiana Hypoxia Working Group (LHWG). The points made reflect discussions over the past several years by participants in the LHWG.

The LHWG was started in 2003 to help implement and support the *Gulf Hypoxia Action Plan* in Louisiana, and has met on a monthly basis since then. It currently serves as a forum for agencies, researchers, and stakeholders to share information and ideas about activities underway that support the Action Plan in Louisiana, and remains the only open and consistent public outreach effort to do so in the state.

The *Gulf Hypoxia Action Plan* (GHAP) represents a cooperative agreement between key federal agencies, twelve states in the Mississippi and Ohio River Basins, and research institutions (the Land Grant Universities in these States), with participation by private sector and stakeholder organizations.

The 2012 and 2017 versions of the *Comprehensive Master Plan* (CMP) included sections on the GHAP. The 2023 Draft did not. CPRA staff stated at the BR Public Meeting on January 31, 2020 in Baton Rouge that a section on the GHAP would be added for the final version.

For that reason, it seems beneficial to clarify again the core components of the GHAP. The central Goal of the GHAP has been carried over from its first version in 2001: achieving an average annual size for the Gulf Hypoxic Zone of 5000 square kilometers (1950 square miles), on a five-year running average. The 2001 version of the GHAP set the date of 2015 for achieving this Goal. When the Task Force failed to reach that deadline, the GHAP was revised in 2015 and set a new target date of 2035. Ahead of that, the 2015 Revised Goal of the GHAP set an Interim Target of achieving a 20% reduction of Nitrogen and Phosphorus loading from the Mississippi-Atchafalaya River Basin (MARB) to the Gulf by the year 2025.

The language in the 2017 CMP therefore is inaccurate - the Gulf Hypoxia Task Force was not established in 1997 merely "to understand the causes and effects of eutrophication in the Gulf" and to "coordinate management activities throughout the [MARB] to reduce its impacts," but to achieve nutrient load reductions that result in reaching the Target and Goal set out in the GHAP.



## LHWG Comments on 2023 Draft Comprehensive Master Plan - 2

A similar problem is evident in the 2017 CMP's description of the State "aligning to the goals of the Gulf Hypoxia Action Plan" - the State made a commitment along with the other signatories to the GHAP to help achieve its goals, the primary one being reduction of nutrient loads to reduce the size of the Gulf Hypoxic Zone. The title of the 2014 "Louisiana Nutrient Management Strategy" reflected a decision by some Louisiana agency personnel not to honor the State's commitment to fulfill the requirement in the 2008 *Action Plan* revision to develop a State Nutrient **Reduction** Strategy (emphasis added). Fortunately, the other States on the HTF did honor that commitment in the development of their State Strategies, and Louisiana amended its Strategy's title in the 2019 update to read "Nutrient Reduction and Management Strategy" (hereafter "State Nutrient Strategy.")

The key method for achieving adequate levels of nutrient load reductions remains agricultural conservation and management programs, along with other efforts (point source reductions, wetland restoration) that can be implemented on the timelines called for in the GHAP. The State's Nutrient Strategy has indicated an apparent confusion on this point, since it made river diversions for coastal restoration the main tool of the Strategy, but it has been clear for a number of years that another diversion would not be completed before the GHAP's 2025 Interim Target date. Assuming that additional diversion projects are completed ahead of the 2035 Goal date, they can be assessed for their contribution towards that milestone.

It has always been clear that diversions have no effect until they are operational, so until that point, they make no contribution to the GHAP. (A similar consideration holds for the state Water Quality Trading Program.) The GHAP has opened a window for at least the last 20 years to help reduce nutrient loads in the Mississippi and Atchafalaya Rivers before the next diversion project comes online. That opportunity still exists, although the window is closing. In addition to fulfilling the commitment that the State and other GHAP signatories have made, this step would help alleviate some of the concerns that a number of stakeholders who depend on coastal fisheries have expressed about impacts of diversions during that 20-year time period.

The HTF has, unfortunately, not made the 2025 Interim Target its main priority since 2015, nor has the State of Louisiana insisted that it do so. There are recent developments at the federal and Congressional levels that will provide additional resources on a significant scale. Louisiana's Congressional Delegation has for over a decade sponsored appropriations requests submitted by constituents to support implementation of the GHAP, and Senator Cassidy sponsored a provision in the 2021 Bipartisan Infrastructure Law (IIJA) that provides direct funding to the HTF States to do so over the next five years (utilizing the model from those earlier appropriations requests).

The first installment of these BIL funds will largely be spent in Northeast Louisiana, where most of the State's nutrient load to the Mississippi-Atchafalaya Rivers (and the Gulf) comes from. That portion of the State's BIL Work Plan will be undertaken by the Louisiana Office of Soil and Water Conservation and local Conservation Districts, and thus directly support reaching the goals of the GHAP, something that has long been supported by Louisiana's stakeholders, Legislature, and Congressional Delegation.

## LHWG Comments on 2023 Draft Comprehensive Master Plan - 3

Significant funding in the Inflation Reduction Act (IRA) and other recent federal legislation that expands the scale of climate-friendly agriculture will also help improve water quality in the MARB over the next decade, as can increased dedicated funding for the Land and Water Conservation Fund and America the Beautiful Program. Both of the latter programs can be utilized by the “Louisiana Outdoors Forever” Initiative passed by the Legislature in 2022.

Also at the state level, Louisiana, along with the other 5 Gulf States, received funding in 2017 under the BP Disaster Natural Resources Damage Assessment (NRDA) specifically allocated for non-point source nutrient pollution reduction. While neither State has prioritized the GHAP in spending the funds thus far, Louisiana directed part of the funds to projects that have some nutrient reduction benefit for the Gulf. The State retains \$10.5 million of the original \$20 million that has sat unspent since 2018, but could be directed to directly support the GHAP.

In conclusion, appropriate language on the GHAP for the 2023 CMP Revision should a) reaffirm the State of Louisiana's commitment to helping to achieve the Target and Goal of the GHAP, which means taking actions that can be implemented on the timelines specified there; and b) commit to assessing the impacts of coastal diversion projects on Gulf Hypoxia as they become operational (such impacts would be measured over time).

Sincerely,

Doug Daigle  
Coordinator  
Louisiana Hypoxia Working Group

### References:

Louisiana Hypoxia Working Group  
<https://www.facebook.com/Louisiana-Hypoxia-Working-Group-114808855347180/>

*Action Plan for Reducing Hypoxia in the Northern Gulf of Mexico* (2001, 2008, 2015)  
<https://www.epa.gov/ms-htf/hypoxia-task-force-action-plans-and-goal-framework>

*Louisiana Nutrient Reduction and Management Strategy*; BIL Work Plan  
<https://www.deq.louisiana.gov/page/nutrient-management-strategy>

Louisiana Trustees Final Restoration Plan #4 for Recreation and Nutrient Reduction  
<https://www.gulfspillrestoration.noaa.gov/2018/07/louisiana-trustees-release-final-restoration-plan-4-recreational-use-and-nutrient-reduction>

HCR 98, Louisiana Legislature 2022 Regular Session  
<https://legis.la.gov/Legis/BillInfo.aspx?i=243415>

## CPRA Master Plan

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**From:** Ben Malbrough  
**Sent:** Friday, March 24, 2023 3:19 PM  
**To:** CPRA Master Plan  
**Cc:** Brian Lezina; Dustin Rabalais  
**Subject:** Master Plan Comment

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Please accept this email as a formal comment from Bayou Lafourche Fresh Water District (BLFWD) on the 2023 Draft Coastal Master Plan (Plan).

Overall, BLFWD is pleased with the Plan, but there are some things we would like to be reconsidered, specifically as it relates to Bayou Lafourche at Larose. The current Plan appears to aim at directing all of the additional flow into Bayou Lafourche east of Larose into the Barataria Basin (based on the description of Project 322). While we are all for reducing salinities anywhere we can, we feel that the focus of utilization of Bayou Lafourche water as it relates to reducing salinities should be immediately west of Larose through Grand Bayou. Currently, there is a 2017 Coastal Master Plan Project (03a.HR.100: Grand Bayou Hydrologic Restoration) that is currently being funded by CPRA and in the Annual Plan that aims to do just what we think should be done in this area. This project will utilize GIWW and the increased Bayou Lafourche flow to maximize fresh water to the eastern Terrebonne Basin which is in much more dire need of continuous flow of fresh water. Currently the Plan not only doesn't include the Grand Bayou Project, but it aims to direct the increased flow of Bayou Lafourche in the opposite direction of what we have been trying to achieve with the implementation of almost \$180,000,000 of the Mississippi River Reintroduction into Bayou Lafourche Project (MRRBL). BLFWD has spent a tremendous amount of money and effort trying to maximize the benefit of Bayou Lafourche flows into eastern Terrebonne, and we still think the focus of these flows need to be directed there. In addition, we feel it absolutely necessary to add the Grand Bayou Hydrologic Restoration back into the Plan. Another note is that utilizing the template set up by CPRA in using Maurepas Diversion to offset the mitigation costs of the West Shore Project, BLFWD feels that the MRRBL is functionally equivalent enough to warrant a discussion about it being utilized to offset mitigation costs for Morganza to the Gulf, and the Grand Bayou Project is a key component in recognizing those salinity reduction benefits.

Please consider these comments when finalizing your plan, and feel free to reach out to me for any of the information, models, reports, etc. that we have completed in analyzing these projects.

Thanks

**Ben Malbrough, P.E.**  
**Executive Director**  
**Bayou Lafourche Fresh Water District**  
1016 St. Mary Street  
Thibodaux, LA 70301  
Office: (985) 447-7155  
Fax: (985) 447-6307

## CPRA Master Plan

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**From:** Johnson, Erik  
**Sent:** Friday, March 24, 2023 4:00 PM  
**To:** CPRA Master Plan  
**Cc:** O'Neal, Dawn  
**Subject:** public comment  
**Attachments:** 2023CMP\_AudubonComments-2023-03-24.pdf

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**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

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Hello CPRA Master Plan review team,

Please accept the attached letter as a public comment to the 2023 Draft Comprehensive Master Plan for a Sustainable Coast on behalf of the National Audubon Society.

Many thanks!  
Erik

—  
**Erik I. Johnson, Ph.D.**  
Director of Conservation Science  
Audubon Delta

**National Audubon Society**  
[audubon.org](https://audubon.org)

Re: Louisiana's 2023 Comprehensive Master Plan for a Sustainable Coast

24 March 2023

To: Coastal Protection Restoration Authority, Office of the Governor

Thank you for this opportunity to comment on Louisiana's 2023 Comprehensive Master Plan for a Sustainable Coast ("Master Plan"). On behalf of our 1.5 million members, the National Audubon Society (hereafter "Audubon"), which focuses on making places healthier and more resilient for birds and people, we extend our appreciation to the CPRA and their team of scientists and engineers that have taken bold action and significant investments to protect and preserve our cultural and natural heritage. Audubon has had a presence on the Gulf Coast for over a century, and as a landowner in coastal Vermilion Parish since 1924, we share CPRA's deep commitment to improve the region's sustainability and to support investments in natural infrastructure for birds and people. In addition to the comments we shared with CPRA along with our Mississippi River Delta Coalition partners, we would like to offer the additional comments.

Audubon has been part of a coalition of landowners in southwestern Louisiana since 2010 known as the Rainey Conservation Alliance (RCA). Collectively, the RCA manages 187,000 acres of coastal wetlands and work collectively to leverage resources to benefit the region, recognizing that supporting restoration in neighboring lands benefits the whole. The Master Plan project selection is well aligned with the 2022 RCA Management Plan, which identifies \$250 million in restoration need in the region. The RCA Management Plan<sup>1</sup> and Dashboard<sup>2</sup> can be accessed online. We offer three recommendations, however, to improve the 2023 Master Plan's alignment of the need recognized by the RCA:

- 1) The East Rainey Marsh Creation polygon should be expanded to the north and west (to the McIlhenny Canal) to encompass the Bay Coast Management Unit as well as Belle Isle Lake<sup>2</sup>. The Belle Isle Lake terraces built in the early 2000s are now almost completely submerged, making the landbridge between the lake and canal at risk to breaching. A breach would create much greater exchange with Vermilion Bay, threatening wetlands and associated restoration investments between Belle Isle Lake and Freshwater Bayou. The 1,800-acre Bay Coast Management Unit has seen a conversion of 179 acres (about 10% of the area) from wetlands to open water between 2003 and 2019, and is at risk to further wetland loss and breaching into Vermilion Bay without restoration action.

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<sup>1</sup> Rainey Conservation Alliance 2022 Management Plan:  
<https://nationalaudubon.box.com/s/jnm9uwp6lg00z7kvjqgo8lnx3ulyqycd>

<sup>2</sup> Rainey Conservation Alliance 2022 Management Plan Project Dashboard:  
<https://audubon.maps.arcgis.com/apps/dashboards/93fea07c389d4118975e7d97907d5d08>

- 2) The West Rainey Marsh Creation polygon does not need to include the Deep Lake Management Unit (a potential trade for the expansion request of East Rainey Marsh Creation described above). We have partnered with Ducks Unlimited, Wildlife Conservation Society, North American Wetlands Conservation Act, and National Fish and Wildlife Foundation to invest in the restoration of those approximately 4,000 acres by restoring hydrologic functioning, adding terraces, and dredging for creating marsh.
- 3) We would like to see the inclusion of a polygon that reflects the South Avery Island Shoreline Protection and Marsh Restoration project<sup>2</sup>, considered for CWPPRA PPL32 and PPL33 Phase I funding. This project would benefit 570 acres of wetlands and prevent the Intracoastal Waterway from merging with Vermilion Bay, thereby protecting important ecological, ecotourism, and business assets on Avery Island.

We appreciate that shoreline protection projects are now considered programmatic and consistent with the Master Plan, as communities, landowners, and restoration practitioners in southwestern region have been requesting shoreline protection projects since the very first Master Plan in 2007. There are several areas of shoreline protection needed in the RCA area (see RCA Management Plan Project Dashboard).

Finally, we urge CPRA to keep the polygon boundaries of the Mud Lake Marsh Creation project, as this polygon includes the most important known Eastern Black Rail habitat in Louisiana. This species was only recently discovered in 2017-2019 to have year-round (breeding and over-wintering) populations in Louisiana<sup>3</sup>, and was listed as threatened on the Endangered Species List in 2020. Without action, the Eastern Black Rail has been modeled to go extinct by 2068<sup>4</sup>. Restoration action to rebuild high marsh (i.e., irregularly inundated by storm surge, dominated by *Spartina spartinae*, and maintained by fire) is urgently needed to support this species. Unfortunately, the proposed Commonwealth LNG export terminal would fall within the footprint of the critically important Mud Lake Marsh Creation project, and that terminal would destroy habitat that supports about 2% of the entire Eastern Black Rail population, and in our opinion, an estimated 15-30% of Louisiana's population. This proposed LNG export terminal should not be allowed, and is inconsistent with the goals of the Master Plan. Furthermore, we would be eager to work with CPRA and other restoration partners to develop project designs that rebuild high marsh habitat in the region to support Eastern Black Rails and serve as ridges that protect wetlands and communities to the north.

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<sup>3</sup> Johnson, E.I., and J. Lehman. 2021. Status and habitat relationships of the Black Rail (*Laterallus jamaicensis*) in coastal Louisiana, USA. *Waterbirds* 44:234-244.

<sup>4</sup> <https://ecos.fws.gov/ServCat/DownloadFile/154242>



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[la.audubon.org](http://la.audubon.org)

Thank you again for considering these comments. We look forward continuing to work with the CPRA to ensure a more sustainable future for Louisiana's coast.

Sincerely,

A handwritten signature in black ink, appearing to read "Dawn O'Neal", with a long horizontal line extending to the right.

Dawn O'Neal  
Vice President, National Audubon Society  
Executive Director, Audubon Delta

## CPRA Master Plan

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**From:** Michelle Gonzales  
**Sent:** Friday, March 24, 2023 4:05 PM  
**To:** CPRA Master Plan  
**Subject:** JP Master Plan Comments  
**Attachments:** JP DCMP Comments.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Please see attached comments.

**Michelle M. Gonzales, CFM** | Director  
**Ecosystem and Coastal Management**  
Jefferson Parish Government  
1221 Elmwood Pk Blvd Suite 310 | Jefferson, LA 70123  
o: 504.736.6653

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# JEFFERSON PARISH

## ECOSYSTEM AND COASTAL MANAGEMENT

CYNTHIA LEE SHENG  
PARISH PRESIDENT

MICHELLE M. GONZALES  
DIRECTOR

March 25, 2023

Attention: Coastal Protection and Restoration Authority

Reference: Public Comment - 2023 Draft Coastal Master Plan Barataria Basin in Jefferson Parish – Jefferson Parish Government: Department of Ecosystem and Coastal Management

Transmitted via email to: **masterplan@la.gov**

To Whom It May Concern:

The Parish of Jefferson's Department of Ecosystem and Coastal Management offers the following comments to the Coastal Protection and Restoration Authority (CPRA) regarding the 2023 Louisiana's Comprehensive Master Plan for a Sustainable Coast, 4<sup>th</sup> Edition, Draft Plan (released January 2023).

As stated in the draft Coastal Master Plan (DCMP), Attachment F3, Parish Fact Sheets, "Jefferson Parish is the second-most populous parish in the state (after East Baton Rouge Parish) with about 436,000 residents in 2015." Accordingly, Jefferson Parish is the most populous parish in the Louisiana coastal zone. Jefferson Parish communities outside of the Greater New Orleans Hurricane and Storm Damage Risk Reduction System (HSDRRS), particularly the Town of Lafitte; its surrounding communities of Lower Lafitte, Barataria, and Crown Point; and Grand Isle, "suffered devastating storm surge impacts" from Hurricane Ida in 2021, and residents and businesses are still in recovery mode today (CPRA, 2023, p. 136).

The Multiple Lines of Defense Strategy (Lopez, 2006) for the Barataria Basin and Jefferson Parish includes barrier islands, the Barataria Basin landbridge and constructed levee systems, as well as establishing and sustaining wetland habitat. The 2023 DCMP includes twelve (12) projects for the Barataria Basin to restore and enhance these lines of defense.

Jefferson Parish is fully supportive of the following projects within Jefferson Parish and the benefits they will provide to our vulnerable communities:

- Lafitte Ring Levee (2023 Draft State Master Plan Project #083) to provide a levee system for additional defense against hurricane induced storm surge for some of the parish's most vulnerable communities.

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- Caminada Bay Marsh Creation and Fifi Island Ridge (2023 Draft State Master Plan Project #329) to fortify our barrier island system to provide wave and storm surge attenuation.

Jefferson Parish, however, is concerned that restoration in critical areas of the parish is not fully addressed and that the DCMP relies too heavily on the success of the Mid-Barataria Sediment Diversion (MBSD) to restore and sustain the Barataria Basin landbridge. “The 2023 Coastal Master Plan assumes that the Mid-Barataria Sediment Diversion is actively operating throughout the entire 50-year period of evaluation.” (p. 137). In our opinion, this assumption could lead to inexact conclusions and omission of marsh creation projects in critical areas of the Barataria Basin landbridge.

In its current form, the DCMP includes no projects west of the Barataria Bay Waterway (BBW) in the mid-Barataria landbridge area between the southern shoreline of Lake Salvador and the northern and eastern shorelines of Little Lake. Jefferson Parish is extremely concerned with the lack of projects on the mid-Barataria Basin landbridge west of the BBW in the 2023 DCMP.

The edge marsh and marsh remnants on the landbridge are being eroded from the north as well as from the south. Extensive damage has occurred to wetlands that separate Lake Salvador from the Gulf Intracoastal Waterway (GIWW). The land masses between Bayou Perot and Bayou Rigolettes as well as those unrestored areas surrounding Little Lake, including the eastern and northern portions, are rapidly disappearing. Bays and inlets in the area are widening as marsh edge is eroding. These large openings create conduits for sediment to leave the basin, resulting in extensive marsh loss that ultimately will increase fetch from the Gulf to the Hurricane Storm Damage Risk Reduction System, as supported by the following:

- a. “The dominant water exchange route between the upper and lower basin is through Little Lake, Bayou Perot, and Lake Salvador.” (Louisiana Coastal Wetlands Conservation and Restoration Task Force, 1993, p. 7).
- b. Within the Barataria Basin, net sediment transport mainly occurs during cold front passages. (Li et al., 2021).
- c. “The biggest factor affecting coastal erosion is the strength of the waves breaking along the coastline. A wave’s strength is controlled by its fetch and the wind speed. Longer fetches and stronger winds create bigger, more powerful waves that have more erosive power.” (Jackson, 2014).
- d. “Because existing marsh landbridges are identified as a Line of Defense and, therefore, a priority for preservation or restoration, this places priority on existing marsh remnants.” (Lopez, 2006, p. 20).

The currently effective 2017 Coastal Master Plan includes two large-scale Barataria marsh creation projects on the landbridge, one east of the BBW (Large-Scale Barataria Marsh Creation – Component E: 2017 State Master Plan Project #002.MC.05e) and one west of the BBW (Lower Barataria Marsh Creation - Component A: 2017 State Master Plan Project #002.MC.04a). In its current draft form, the 2023 DCMP update eliminates the authorized Lower Barataria Marsh Creation - Component A west of BBW and replaces the Large-Scale Barataria Marsh Creation –

Component E east of the BBW with large-scale marsh creation (090c) in the vicinity of the Mid-Barataria Diversion.

Elimination of marsh creation west of the BBW creates obstacles for Jefferson Parish's primary restoration goal, which is to complete and maintain the Barataria Landbridge, with emphasis on those areas west of the BBW. Completing this goal will provide a maintained habitat feature in our multiple lines of defense to better protect Lafitte and its surrounding communities, the west bank of Jefferson Parish, and the entirety of the Greater New Orleans metropolitan area from the direct potential surge conduit in the Barataria Basin.

The Parish has significantly invested in planning as well as engineering and design for the West Barataria (WB) Marsh Creation Project, which is in furtherance and conformity and is directly abutting the 2017's Plan's Lower Barataria Marsh Creation - Component A Project (#002.MC.04a). The project would use Mississippi river sediment delivery via pipeline to facilitate immediate marsh creation west of Bayou Barataria.

- a. WB01 would extend the existing sediment delivery corridor to Harvey Cut at its opening into Turtle Bay. This project is currently in the last stages of final design and a joint permit application is under review.
- b. WB02 would create 516 acres of marsh west of the BBW adjacent to the remnant Barataria ridge which was severed when the BBW was constructed. Preliminary design for this project is 90% complete.
- c. WB03 would create 421 acres of marsh adjacent to WBA-02. Preliminary design is 80% complete.

As stated above, Jefferson Parish requests that the Lower Barataria Marsh Creation - Component A: (State Master Plan Project #002.MC.04a) be included in the final version for the 2023 Coastal Master Plan.

Sincerely,



Michelle Gonzales

## References

- Coastal Protection and Restoration Authority. (2023, January). 2023 Louisiana's Comprehensive Master Plan for a Sustainable Coast, 4<sup>th</sup> Edition, Draft Plan. <https://coastal.gov/our-plan/2023-coastal-master-plan/>
- Jackson, Alex. (2014, July 6). Coastal Erosion, Factors affecting the rate of erosion. Geography as Notes. <https://geographyas.info>
- Li, G., Xu, K., Xue, Z., Liu, H., & Bentley, S. (2021, February 5). Hydrodynamics and sediment dynamics in Barataria Bay, Louisiana, USA. *Estuarine, Coastal and Shelf Science*, 249. <https://doi.org/10.1016/j.ecss.2020.10709>
- Louisiana Coastal Wetlands Conservation and Restoration Task Force. (1993, November). Louisiana coastal wetlands restoration plan, Barataria basin, Appendix D. [https://lacoast.gov/reports/CWCRP/1993/Appendix\\_D\\_BaratariaBasin.pdf](https://lacoast.gov/reports/CWCRP/1993/Appendix_D_BaratariaBasin.pdf)
- Lopez, John A. (2006, January 6). The Multiple Lines of Defense Strategy to Sustain Coastal Louisiana. <https://scienceforourcoast.org/wp-content/uploads/PDF-Documents/MLODSfullpt2-06.pdf>

## CPRA Master Plan

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**From:** Lisa Diaz  
**Sent:** Friday, March 24, 2023 4:31 PM  
**To:** CPRA Master Plan  
**Cc:** Joya Manjur  
**Subject:** Sierra Club Comments on Draft Coastal Master Plan  
**Attachments:** Sierra Club Comments on Draft Coastal Master Plan.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Good afternoon,

Sierra Club submits the attached comments on the 2023 draft Coastal Master Plan. Should you have any questions or concerns please do not hesitate to contact me.

Kind Regards,



*Lisa M. Diaz*  
Associate Attorney  
Sierra Club Environmental Law Program  
910 Julia Street  
New Orleans, LA 70113  
(t) 305-336-2258

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**SIERRA  
CLUB**

**910 Julia Street  
New Orleans, LA 70113  
TEL.: (305) 336-2258**

March 24, 2023

Coastal Protection and Restoration Authority  
150 Terrace Avenue  
Baton Rouge, LA 70802  
masterplan@la.gov

**RE:** Comments on 2023 Draft Coastal Master Plan

Dear Coastal Protection and Restoration Authority:

Please consider the following comments submitted by Sierra Club<sup>1</sup> on the Coastal Protection and Restoration Authority's ("CPRA") 2023 draft Coastal Master Plan ("Draft CMP").

### **SUMMARY**

The current version of the CPRA's draft CMP fails to include significant information that must be evaluated. Pursuant to La. R.S. 49:214.5.2, "the master plan shall include a comprehensive strategy addressing the protection, conservation, enhancement, and restoration of the coastal area[.]" In creating the master plan, the CPRA should combine "coastal restoration, coastal zone management, storm damage reduction, hurricane protection, flood control, and the protection, conservation, restoration, and enhancement of coastal wetlands, marshes, cheniers, ridges, coastal forests, and barrier shorelines or reefs[.]"<sup>2</sup> The draft CMP fails to provide a comprehensive I.T. analysis of the selected projects, does not consider environmental justice communities, and ignores the effects that industry will have on the coastal area and the environment, thus providing inaccurate figures. Consequently, the CPRA should consider the submitted comments and implement the requested changes in the draft CMP in order to comply with its obligations to form a comprehensive coastal master plan.

### **SPECIFIC COMMENTS**

#### **I. The Coastal Master Plan must include a comprehensive I.T. analysis of the environmental consequences associated with the plan.**

The Louisiana Constitution Article IX, Section I provides for the protection and

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<sup>1</sup> Sierra Club is the nation's oldest grassroots organization. Sierra Club's Dirty Fuels Campaign tackles the pressing problems of global warming, air pollution, water pollution, and the national dependence on non-renewable energy sources such as liquid natural gas.

<sup>2</sup> La. R.S. 49:214.2.12.

conservation of the state's natural resources as a public trust.<sup>3</sup> The Supreme Court interpreted this provision to "impose[] a duty of environmental protection on all state agencies and officials, establish[] a standard of environmental protection, and mandate[] the legislature to enact laws to implement fully this policy."<sup>4</sup> The Court has interpreted this constitutional standard as a "rule of reasonableness" which "requires a balancing process in which environmental costs and benefits must be given full and careful consideration along with economic, social and other factors."<sup>5</sup>

Agencies must consider several factors when making a decision that impacts the environment, including: (1) the potential and real adverse environmental effects of the proposed project have been avoided to the maximum extent possible; (2) whether the social and economic benefits of the project outweigh the environmental impact costs; and (3) whether there are alternative projects and alternative sites or mitigating measures which would offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable.<sup>6</sup> This is known as an I.T. analysis. The draft CMP has a significant role in shaping Louisiana's coastal environment for years to come. Thus, the CPRA must conduct a clear, comprehensive I.T. analysis of the plan in order to satisfy its responsibility under the Louisiana Constitution. In order to comply with its requirements under Article IX, the CPRA must engage in an "individualized consideration" of the factors.

While the draft CMP explains many of the positive environmental impacts and financial costs of the projects, there are several glaring omissions. As discussed in Section III, the draft CMP fails to discuss the adverse environmental impacts and costs of industry activities, including but not limited to LNG activities, on the Louisiana coast. Second, as discussed in Section II, the draft CMP does not adequately address social factors like race and income in the communities in which the projects are proposed. Without analyzing the socioeconomic context of each project, the CPRA cannot accurately calculate the true costs and benefits of the projects. Finally, though the draft CMP states that the CPRA used "The Planning Tool" to analyze alternative projects, the draft does not provide any specific details about those potential alternatives. In absence of adequate information about alternatives, it is not clear if the alternative projects could offer more protection to the environment than the proposed projects. Thus, the CPRA must conduct a thorough I.T. analysis and communicate the full extent of the environmental impacts; analyze the social and economic costs and benefits; and discuss in detail any alternative projects that were under consideration.

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<sup>3</sup> "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. The legislature shall enact laws to implement this policy." La. Const. art. IX, § 1.

<sup>4</sup> *Save Ourselves, Inc. v. Louisiana Env'tl. Control Comm'n*, 452 So.2d 1152, 1156 (La. 1984).

<sup>5</sup> *Matter of American Waste and Pollution Control Co.*, 642 So.2d 1257, 1262 (La. Sept. 15, 1994) (quoting *Save Ourselves*); *Save Ourselves*, 452 So.2d at 1157.

<sup>6</sup> *In re Rubicon, Inc.*, 95-0108 (La. App. 1 Cir. 2/14/96); 670 So.2d 475,482 (citing *Save Ourselves*, 452 So.2d at 1157).

## **II. The Coastal Master Plan must include an environmental justice analysis.**

Louisiana state law requires the coastal master plan to “include a comprehensive strategy addressing the protection, conservation, enhancement, and restoration of the coastal area through the construction and management of integrated coastal protection projects and programs.”<sup>7</sup> It must also include information about the “social, geographic, economic, engineering, and biological considerations as to why each project or program was selected for inclusion,” where feasible.<sup>8</sup> To fulfill these statutory requirements, the CPRA must include a comprehensive environmental justice analysis in the draft CMP.

Environmental justice, as defined by the Environmental Protection Agency (“EPA”), is “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.”<sup>9</sup> Achieving environmental justice requires ensuring that all people enjoy the same degree of protection from environmental and health hazards, and equal access to the decision-making process to have a healthy environment in which to live, learn, and work.<sup>10</sup>

In Louisiana the communities which are at the highest risk for coastal land loss, flooding, storm surges, and climate change are also the state’s most socially vulnerable communities.<sup>11</sup> As depicted in Figure 1, a majority of Louisiana’s coastline is above the 70th percentile on EJScreen’s demographic index, which indicates that the percent of low-income and people of color population is higher than in 70 percent of the nation.<sup>12</sup>

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<sup>7</sup> La. R.S. 49:214.5.2(A)(2).

<sup>8</sup> La. R.S. 49:214.5.3(D)(1).

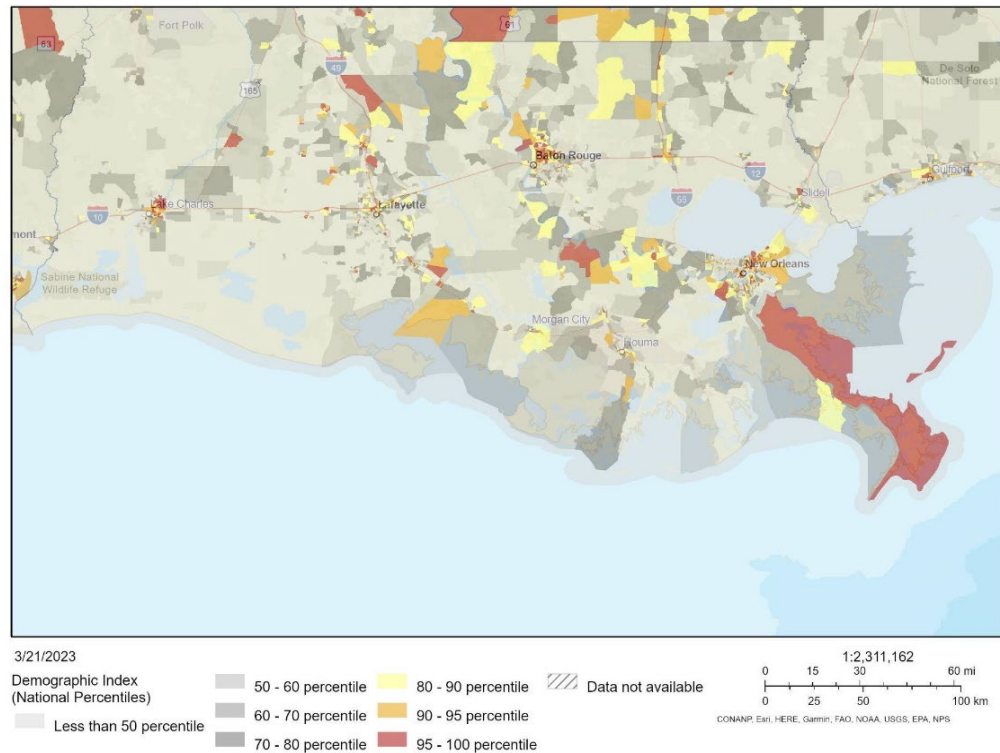
<sup>9</sup> U.S. EPA, Environmental Justice, <https://www.epa.gov/environmentaljustice>.

<sup>10</sup> *Id.*

<sup>11</sup> A recent U.S. EPA report concluded that socially vulnerable populations may be more exposed to the highest impacts of climate change. It focused on four categories of social vulnerability: income, educational attainment, race and ethnicity, and age. U.S. EPA., Climate Change and Social Vulnerability in the United States: A Focus on Six Impacts. U.S. Environmental Protection Agency (2021), [www.epa.gov/cira/social-vulnerability-report](http://www.epa.gov/cira/social-vulnerability-report).

<sup>12</sup> U.S. EPA, EJScreen Technical Documentation (2022), at 26, <https://www.epa.gov/system/files/documents/2023-01/EJScreen%20Technical%20Documentation%20October%202022.pdf>. (EJScreen is an environmental justice mapping and screening tool designed by the U.S. EPA which uses socioeconomic indicators such as race and income as indicators of a community’s potential susceptibility to environmental impacts.).





**Figure 1**, EJScreen demographic index. Data: EJScreen, EPA.<sup>13</sup>

A high demographic index generally correlates with greater exposure to environmental burdens than the general population as a whole and may indicate increased susceptibility to environmental burdens.<sup>14</sup> Thus, certain coastal communities in Louisiana with a high demographic index are particularly vulnerable to the increasing environmental burdens associated with climate change and sea level rise. Those who are already vulnerable due to a range of social, economic, historical, and political factors have a lower capacity to prepare for, cope with, and recover from climate change impacts.<sup>15</sup> As is evident in Figure 1, Louisiana’s coastal communities do not all share the same future capacity to bear additional environmental impacts. The communities with a higher demographic index are at higher risk of harm from future coastal land loss, flooding, sea level rise, and other impacts. Thus, it is essential that the CPRA center environmental justice in planning for the future of Louisiana’s coast, to ensure that the environmental burdens do not disproportionately fall upon the most vulnerable communities.

It is not clear from the draft CMP that the CPRA has adequately addressed environmental justice, procedurally or substantively. First, the draft CMP states that the CPRA interacted with “a broad array of local stakeholders, communities, and technical experts,” but it does not provide any detail about the nature and extent of the interactions, or about which communities were

<sup>13</sup> *Id.*

<sup>14</sup> *Id.* at 24.

<sup>15</sup> Climate Change and Social Vulnerability in the United States, *supra* note 11 at 9.

contacted.<sup>16</sup> This is a significant omission, particularly in light of the historic barriers to public participation in the communities most vulnerable to climate impacts. The CPRA must make transparent, meaningful efforts to engage the most vulnerable coastal communities. Second, the CPRA has not provided adequate information about all of the environmental impacts covered in the draft CMP, most notably in omitting any analysis of LNG impacts, as discussed further in Section III. Thus, members of the impacted communities do not have enough accurate information about the plan to comment on it in a fully informed manner. This prevents meaningful participation and obstructs environmental justice.

Moreover, the draft CMP does not incorporate any efforts toward substantive environmental justice. It does not provide any demographic or socioeconomic information about the communities impacted by coastal issues or involved in the projects. It does not make any attempt to ensure that projects and funds go to the communities that most need support. In fact, the draft CMP states that “the projects evaluated in the master plan process are compared based upon their performance with regard to two decision drivers: land area built and maintained and reduction of flood risk.”<sup>17</sup> Limiting project performance evaluations to those two factors wholly ignores the potential social impacts of the projects and the differing levels of need for flood risk reduction based on community resilience capacity, which violates the CPRA’s duty to develop a comprehensive strategy for coastal management.

The CPRA must include more information about the disparate impacts of climate change on Louisiana’s coastal communities. It should prioritize low-income communities and communities of color when allocating projects and funding. It should consider including maps or overlays of socioeconomic data in the draft CMP and project-specific plans, in order to ensure equitable distribution of resources and accountability to environmental justice priorities. Finally, it should analyze social and economic factors as decision drivers in evaluating project performance, and explain the environmental justice reasons for considering such factors.

### **III. The Coastal Master Plan must address the adverse impacts of industry on coastal areas.**

The draft CMP should include a comprehensive strategy, but that cannot be achieved without examining the cumulative impacts of industry, such as oil-and-gas and petrochemical infrastructure. As previously stated, “the master plan shall include a comprehensive strategy addressing the protection, conservation, enhancement, and restoration of the coastal area[.]”<sup>18</sup> which should combine “coastal restoration, coastal zone management, storm damage reduction, hurricane protection, flood control, and the protection, conservation, restoration, and enhancement

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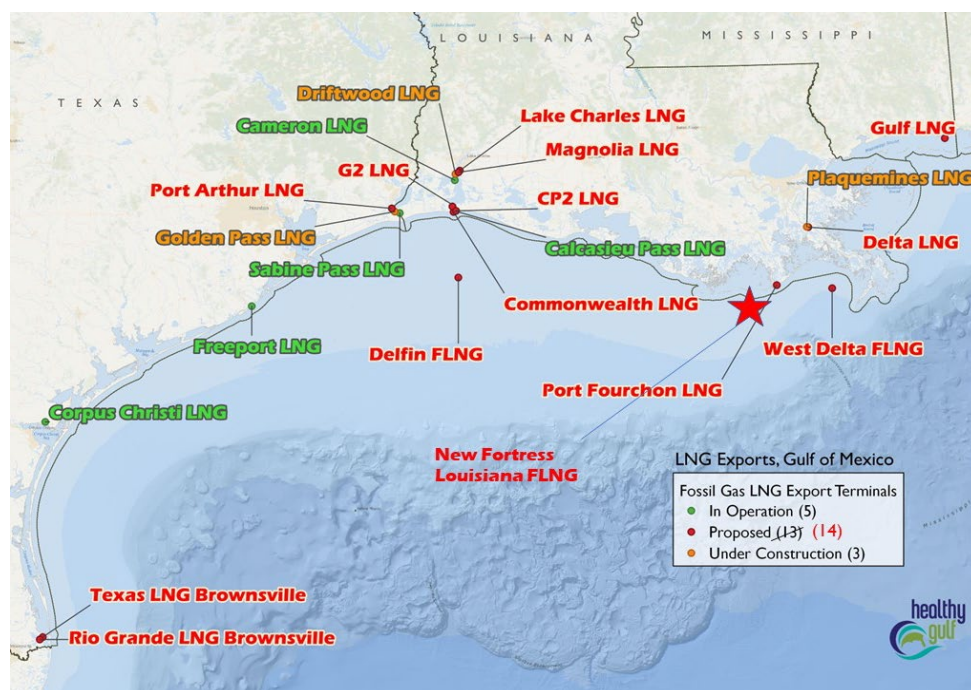
<sup>16</sup> Louisiana Coastal Protection and Restoration Authority, Louisiana’s Comprehensive Master Plan for a Sustainable Coast, 4th Edition, Draft Plan Release January 2023, at 26, [https://coastal.la.gov/wp-content/uploads/2023/01/230105\\_CPRA\\_MP-Draft\\_Final-for-web\\_spreads-main.pdf](https://coastal.la.gov/wp-content/uploads/2023/01/230105_CPRA_MP-Draft_Final-for-web_spreads-main.pdf) (hereinafter “Draft CMP”).

<sup>17</sup> *Id.* at 52.

<sup>18</sup> La. R.S. 49:214.5.2.

of coastal wetlands, marshes, cheniers, ridges, coastal forests, and barrier shorelines or reefs[.]”<sup>19</sup> The draft CMP lacks a comprehensive strategy because it fails to address the effects of industry, specifically the liquified natural gas (“LNG”) export industry, on wetlands and cheniers as well as climate change.

The draft CMP ignores the adverse effects associated with LNG export facilities in Louisiana. This is concerning given that there are approximately ten LNG export facilities which are currently in the permitting process in and off the coast of Louisiana with another two under construction, *see* Figure 2. The CPRA should assess and include the combined environmental impacts of these and other industries in Louisiana, particularly in terms of the collective loss of wetlands, habitat, and the increasing greenhouse gas emissions (“GHG”).



**Figure 2**, LNG terminals in operation, under construction and proposed in Texas, Louisiana, Mississippi, and offshore. Data: Energy Information Administration, Federal Energy Regulatory Commission, Healthy Gulf.

**A. The Coastal Master Plan does not address land loss attributed to industry.**

The draft CMP anticipates the allocation of \$16 billion towards marsh creation.<sup>20</sup> And it claims that since 2007 the CPRA’s projects have benefited 55,807 acres, placed 193,000,000 cubic yards of sediment . . . and restored 71.6 miles of barrier islands.<sup>21</sup> However, these figures are

<sup>19</sup> La. R.S. 49:214.2.12.

<sup>20</sup> Draft CMP, *supra* note 15 at 75.

<sup>21</sup> *Id.* at 11.

misleading as the CPRA overlooks the number of wetlands, marsh, cheniers, and total land loss attributed to industry development since 2007. As a result of this loss the \$16 billion allocated towards marsh creation will prove to be insufficient to protect the coast and communities who inhabit the coastal area.

The draft CMP acknowledges that many coastal industries and businesses rely on coastal communities that are disappearing due to a myriad of factors including repeated flooding.<sup>22</sup> It also acknowledges that “[b]oth natural processes – such as hurricanes, erosion, subsidence, sea level rise – and human-made challenges – like the cutting of canals, oil spills, and building levees on the Mississippi River – impact coastal wetlands and barrier islands and undermine their ability to replenish naturally.”<sup>23</sup> However, the draft CMP lacks a comprehensive analysis of the land loss attributed to industry and consequently paints an inaccurate picture of the future of Louisiana’s coastal area.

The draft CMP predicts that “[f]ully implementing the plan could reduce [expected annual damage in dollars] by up to 70% under the lower scenario and 60% under the higher scenario compared to a future without action.”<sup>24</sup> But these reductions in annual damage fail to consider the increased risk associated with the destruction of wetlands by industry. The construction and operation of the proposed LNG export facilities alone will permanently impact 1,427.5 acres of wetlands and temporarily impact 527.5 acres of wetlands.<sup>25</sup> This is only a small fraction of the number of wetlands lost to industry development.

Wetlands are crucial to the survival of Louisiana’s coastal area because wetlands act as natural storm buffers and flood mitigators.<sup>26</sup> Consequently, the vast number of wetlands lost to the development of LNG export facilities and the oil and petrochemical industry must be evaluated by the CPRA in the final coastal master plan.

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<sup>22</sup> *Id.* at 23.

<sup>23</sup> *Id.*

<sup>24</sup> *Id.* at 86.

<sup>25</sup> The permanent and temporary wetland impacts were calculated utilizing the information provided in the Final Environmental Impact Statements issued by the Federal Energy Regulatory Commission. These numbers account for only six of the proposed LNG export facilities. The following facilities were accounted for: Commonwealth LNG, CP2 LNG, Driftwood LNG (includes impacts of associated pipeline infrastructure), Lake Charles LNG, Magnolia LNG, and Plaquemines LNG (includes impacts associated with the Gator Express Pipeline).

<sup>26</sup> U.S. EPA, *Wetlands: Protecting Life and Property from Flooding* (May 2006), <https://www.epa.gov/sites/default/files/2016-02/documents/flooding.pdf>.

Failing to address the impacts of industry on the coastal area and on crucial habitats such as wetlands does not comply with the CPRA's duties to create a comprehensive plan. Moreover, the land loss and destruction of wetlands and marshes will leave coastal communities vulnerable to climate change and sea level rise.

B. The Coastal Master Plan does not address greenhouse gas emissions attributed to industry.

Louisiana state law supports the consideration of climate change adaptation in an environmental analysis.<sup>27</sup> The draft CMP acknowledges that “an additional 1.6 ft of sea level rise is expected over the next 50 years, adding height to already damaging storm surge levels. As a result of climate change, hurricanes are assumed to increase in intensity by 5% over the same period, exacerbating the risk posed by storm surge.”<sup>28</sup> The draft CMP also considers and integrates the National Oceanic and Atmospheric Administration sea level guidance and the Intergovernmental Panel on Climate Change into its modeling.<sup>29</sup> However, the draft CMP fails to account for the immense amount of greenhouse gas (“GHG”) released by industry in Louisiana.

Of particular concern is the anticipated amount of GHG emissions which will be released by LNG export facilities. Life cycle emissions for LNG export facilities will drastically contribute to climate change, which is detrimental to coastal communities. For example, the life cycle emissions for the approved and under construction Plaquemines LNG facility which is presently authorized for a peak liquefaction capacity of 24.0 million metric tons per annum (“MMTPA”) is estimated to emit 145 million metric tons of carbon dioxide equivalent (“MMT CO<sub>2</sub>e”) per year from the fracking process to end use in other parts of the world.<sup>30</sup> These lifecycle emissions are equivalent to the annual emissions from 37 coal plants or 31.6 million cars.<sup>31</sup>

In the draft CMP the CPRA analyzes their projects up to 50 years out, the CPRA should also analyze and consider the effects that increased GHG emissions will have on the success of their projects. Failing to consider industries contribution to GHG emissions and climate change does not allow for a comprehensive analysis. The CPRA should consider GHG emissions and other impacts from past, present, and reasonably foreseeable new industrial projects in the final coastal master plan.

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<sup>27</sup> La. Const. art. IX, §1.

<sup>28</sup> Draft CMP, *supra* note 15 at 44.

<sup>29</sup> *Id.* at 24.

<sup>30</sup> Cara Bottorff, *LNG Export Expansion Would be a Climate Disaster*, Sierra Club (June 30, 2022), <https://www.sierraclub.org/articles/2022/06/lng-export-expansion-would-be-climate-disaster>.

<sup>31</sup> *Id.*

## **CONCLUSION**

Sierra Club requests that the CPRA reanalyze portions of the draft CMP to ensure that it complies with its duty to create a comprehensive master plan. Presently, the draft CMP is insufficient as it lacks an adequate I.T. analysis, fails to address environmental justice concerns, and ignores industry effects on the coastal area. Sierra Club requests that the CPRA address these issues. Thank you for the opportunity to submit comments on the 2023 draft CMP. Please feel free to contact Lisa Diaz, attorney for Sierra Club, with any questions.

### **Respectfully submitted by:**

/s/ Lisa Diaz  
Lisa Diaz  
Sierra Club  
910 Julia Street  
New Orleans, LA 70113  
(305) 336-2258 (tel)  
Email: [lisa.diaz@sierraclub.org](mailto:lisa.diaz@sierraclub.org)  
*Attorney for Sierra Club*

## CPRA Master Plan

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**From:** Simone Maloz  
**Sent:** Friday, March 24, 2023 4:49 PM  
**To:** CPRA Master Plan  
**Cc:** Chip Kline; Bren Haase  
**Subject:** MRD CMP23 Comments  
**Attachments:** MRD 2023 Draft CMP Comments.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Good afternoon,

Thank you for the tireless work to craft the 2023 Coastal Master Plan, and we appreciate the opportunity to provide comments and feedback. Please see attached.

Sincerely,  
Simone Maloz  
Campaign Director  
Restore the Mississippi River Delta  
985/688.3290 cell

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March 24, 2023

Coastal Protection and Restoration Authority  
Master Plan Public Comments  
150 Terrace Avenue  
Baton Rouge, LA 70802  
[masterplan@la.gov](mailto:masterplan@la.gov)

### Re: Comments on Louisiana's Comprehensive Master Plan for a Sustainable Coast, 4<sup>th</sup> Edition

Dear Chairman Kline and Executive Director Haase:

Restore the Mississippi River Delta (MRD) appreciates this opportunity to provide input on the most recent iteration of Louisiana's Comprehensive Master Plan for a Sustainable Coast (Coastal Master Plan). MRD is a coalition of national and regional nonprofit organizations working to advance an equitable, safer, and flourishing coast for Louisiana's communities, ecosystems, and economy. We are represented by conservation, policy, science, and outreach experts from Environmental Defense Fund, National Audubon Society, the National Wildlife Federation, Coalition to Restore Coastal Louisiana, and Pontchartrain Conservancy.

We write today to once again express our support of the Coastal Master Plan (CMP) and the process that the Coastal Protection and Restoration Authority (CPRA) has developed over the previous iterations to become more inclusive, more responsive, and more forward-thinking in terms of applied science, community engagement, and proposing pragmatic solutions for the existential challenges facing our state. As a Gulf of Mexico state, Louisiana is facing more frequent severe weather events, rising sea levels, and increasingly challenging decision points regarding the natural and built environment, and in response the Coastal Master Plan presents a unified vision with bipartisan support, as coastal communities, business interests, environmental advocates, and all levels of government come together to inform the solutions identified in this draft plan. The Louisiana Coastal Master Plan remains a remarkable achievement; establishing a programmatic response based on the latest science to address clear and present challenges and opportunities for our state. The projects and solutions identified are on the cutting edge of climate change adaptation and damage mitigation, seeking a more resilient, sustainable, and ecologically healthy future while leading the rest of the nation by example.

Our organizations have participated in the CMP process since inception, and we provide the following comments on the January 2023 Draft Plan Release to provide the perspective of people deeply rooted in the Louisiana communities in which we live and work, informed by best available science, seeking to advance thoughtful and equitable solutions. For ease of reference, our comments have been organized into three categories:

- *Coastal Master Plan Process*: comments regarding the process utilized to inform the Draft Plan Release; focusing on inclusivity, access for Louisiana residents and communities, and the





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outward-facing initiatives undertaken by CPRA, representatives of the State of Louisiana, and their agents throughout the years leading up to the January draft and the rollout timeline.

- *Coastal Master Plan Content*: comments which relate to the material presented in the Draft Plan Release, with an eye to technical review of proposed solutions, equity in application, and the comprehensive nature of the plan.
- *Coastal Master Plan Implementation*: comments focusing on the deployment of the Coastal Master Plan across all levels of state government, aligning state efforts with federal initiatives, and opportunities for accomplishing CMP goals through partnerships and collaborative action.

We submit these comments and observations for the review of CPRA staff and State leadership, with the shared objective of a stronger, more informed CMP. We commend CPRA staff and consultants for their determined work on this product, and the pragmatic and science-based approach the CMP project team has relied upon to identify and propose solutions.

### I. Coastal Master Plan Process

The following comments will focus on the process utilized by CPRA and State of Louisiana staff to update the CMP, incorporating scientific assessment and stakeholder engagement into an updated look at the Louisiana coast.

There are opportunities throughout the Master Plan process that CPRA can improve to create a more equitable and representative CMP in the future. Although MRD acknowledges steps the state has taken over the last 6 years, we see missed opportunities in the development and rollout of the draft CMP. We urge CPRA to strive for equitable processes by diversifying the membership of the Master Plan Advisory Groups, making the CMP processes clearer to the public through a transparent timeline, and improving the representation of marginalized communities in the document. We ask that this document improve its acknowledgment and recognition of Louisiana's indigenous population and their history along the coastal region. Regarding the release of the draft plan, we see room for improvement in addressing barriers to access (to the plan and to some public meetings), limited availability of translated materials, lack of a summary document for review during the public comment period, limited print copies, and challenges related to internet accessibility.

#### *Diversity in Contributors to CMP*

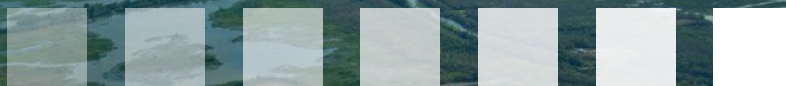
The MRD urges CPRA to continue to take steps in making the Coastal Master Plan process as transparent as possible. This includes providing notice when the Advisory Groups are formed for the next CMP, public access to key points on the timeline for the next CMP and further engagement with active environmental groups in Louisiana.

The MRD appreciates the transparency of the CMP, especially where it lists those involved in the Advisory Groups. The MRD encourages CPRA to review options of all stakeholders and in the future strive to increase diversity of these groups by inviting new experts and community members that have not previously been involved. The CMP process should strive for representative diversity in age, race,



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gender, and location in gathering feedback as it relates to the state of Louisiana. Taking the first step towards this equitable future requires accountability and transparency.

### *Public Engagement Efforts*

Only some environmental groups active in Louisiana were engaged in the CMP development, but several energy companies were members of the Coastal Advisory Team and Regional Working Groups. We recognize the value of representation across the business and industrial sectors of Louisiana, but again emphasize the value of diversity in representation, and encourage CPRA and Governor's Office to reach out to amplify voices that have not been present in the future. CPRA should strive for more balance between coastal stakeholders when forming Advisory Groups for the next CMP.

The MRD urges CPRA to make the Coastal Master Plan processes clearer and more accountable to the public. This can be addressed through a public facing timeline of the Coastal Master Plan process that outlines the various points in which the public can get involved in the multi-year process.

There were extensive outreach efforts leading up to the release of the draft that we led and organized, with nine community meetings across coastal parishes, and we recognize the great effort on CPRA's part to be available for any community-based meeting requests throughout the CMP process. This outreach is essential to the success of Louisiana's coastal program. We appreciate this work to increase access to information and to hear from people who are new to the CMP process. We would like these outreach efforts to continue to expand to create engagement opportunities throughout the creation of the draft, with ample time for residents to become familiar with the project selection process prior to the release of the draft. Before the 2017 plan was released, CPRA hosted focus groups to plan with stakeholders such as landowners, navigation and industry. We would like to see a similar focus on programmatic details of nonstructural interventions, workforce development, diversions and living shorelines. We agree the regional planning teams are necessary, but we think we should expand the subjects to include coast-wide issues.

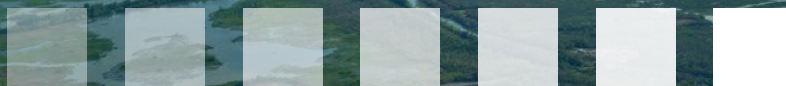
### *Public Comment Period*

Our comments regarding the public comment period are mostly centered on greater accessibility for the public and stakeholders, and how CPRA could expand their approach in the next CMP to ensure access to the document is available to as many people as possible in the state.

We would like to greatly encourage the development of an Executive Summary. The lack of an Executive Summary during the comment period is a barrier to access. We strongly encourage CPRA to provide various translations of the Executive Summary as soon as possible, and in the future, the MRD would encourage CPRA to make translations of summaries available during the public comment period. Translating this document is a strong best practice that began in 2017, and we would like to see translated materials provided throughout the process.

Without condensed summaries available to print or a pre-conceived plan to deliver them across the





state, print copies of the Draft Plan seem limited. MRD encourages CPRA and State to make print copies more readily available along the coastal parishes and throughout Louisiana, so stakeholders and members of the public may have easier access to this important information. Along the same lines, MRD recommends more meetings to allow public comments in coastal parishes, as they are the most impacted.

Roughly 60% of all internet traffic is mobile, and mobile usage increases in rural households without access to high-speed home internet. Without a mobile-first approach to lengthy documents, the ability for some/most people to engage with the document via mobile device is limited. MRD recommends the text of the document and other associated planning efforts be posted in full on mobile friendly websites to improve functionality, readability, and accessibility.

## II. Coastal Master Plan Content

The following comments concern the content of the Draft Plan release, focusing on the presentation of information and solutions in the plan, as well as constructive edits or changes in methodology for the analysis and presentation of proposed projects.

### *Mapping and Graphical Content*

For the purposes of succinct, powerful communications with the public, we suggest CPRA include in the 2023 Master Plan same-page, side-by-side visuals of the following maps: (1) land change for both environmental scenarios (no action) and (2) Future With Action (FWA) and Future Without Action (FWOA) for both environmental scenarios. Having these visuals on one page, we find, makes it easier to see, communicate, and digest differences in environmental scenarios and no action consequences. The differences between these two scenarios are unclear since yet-to-be constructed, major diversion projects are considered to be on the landscape in the FWOA. The starting point in these comparisons is critical to public understanding. We encourage CPRA to clarify that the FWOA scenario includes x number of constructed projects, \$x investment in restoration, and assumes keystone projects like Mid-Barataria and Mid-Breton are implemented. We also encourage CPRA to consider sharing project benefits beyond land built or gained, as in the case of the Mid-Barataria Sediment Diversion, the mapping of land gained does not fully convey the totality of project benefits.

We recommend CPRA include clear graphics and callouts on Master Plan visuals that show constructed projects and their footprints on the landscape along with proposed 2023 Master Plan projects. We commend the work CPRA has completed to date on these projects, and we believe they should showcase those successes along with future project plans to increase public visibility and understanding for the public to see and understand.

With regards to project factsheets, there are a few suggestions we have for clarification and visualization of the candidate projects:

- First, an explanation of projects with letters attached to their project identification number – or rather an explanation of the letters themselves – would work to clear confusion around those







“special” projects.

- Second, we believe the factsheets should showcase completed project benefits and the total project footprint, alongside those proposed, on map visuals.

With regards to the CMP Viewer, the implementation year assignments require more explanation. The usage of specific implementation years is not clear. For example, it is not clear if Year 7 means 2030 or otherwise. We recommend they be updated as new information comes online and in the case that projects are not on schedule. Also, specifically for the project for the upper basin diversions programs: it is not clear what “implementation years” means for this project as five years seems unattainable.

### *Representation of Louisiana Communities*

Through MRD’s review of the Draft Plan, we found there are specific opportunities to improve representation of Louisiana people and communities throughout the document before it moves to the final report. Below, we have highlighted specific inclusions in the Draft Plan that we find commendable and beneficial, as well as some suggested edits.

- Section “THIS UPDATE OF THE MASTER PLAN” (Pages 14 and 15): We are encouraged to see the inclusion of tribal communities in the plan. These resettlement efforts have caused strife but are important work.
- Section “A PART OF THE SOLUTION” (Pages 18 and 19): This section is an appropriate space to communicate how the Draft Plan Release and the solutions identified will protect or prioritize marginalized groups and communities. MRD urges CPRA to address this in the final CMP.
- Section “A HISTORY OF CHANGE” (Pages 22 and 23): Although it is commendable to see acknowledgement of Louisiana’s Indigenous population in a section dedicated to history of the state, we believe CPRA can and should go a step further. Using tools such as Louisiana’s own [Office of Indian Affairs](#), the CMP can recognize these communities properly and specifically. Additional history of these tribes along coastal Louisiana would improve the plan’s representation and scope.
- Section “PEOPLE IN THE PROCESS” (Pages 26-27): We are encouraged to see this inclusion, which provides more transparency. However, this section could be more impactful and provide a greater resource with more concrete links between the input these individuals provided, and the impact on the solutions and policies proposed in the Draft Plan Release.

We think this is the most people-centered master plan to date and applaud CPRA for using innovative methods to show the value of communities beyond monetary metrics. We especially appreciate the use of demographic data and community metrics in the project selection process, as well as the use of expected annual structural damage (EASD) in reviewing project options. These methods help make the selection process more equitable by ensuring that project benefits are not concentrated in more affluent areas. The extensive use of visual aids throughout the master plan improves the readability of the document, making it more accessible to a wide variety of audiences. We recognize CPRA aimed to display information in a variety of ways to accommodate different types of readers.

This draft CMP aims to place a greater focus on people, which is evident by providing historical



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context for how the region developed. We appreciate the acknowledgement of Indigenous communities in a historical context, but as mentioned, we encourage CPRA to name the tribes that currently live in coastal Louisiana and voice their specific vulnerability to climate change impacts.

### *Sediment Diversion and River Re-Introduction Projects*

We appreciate significant time and resources have been dedicated to creating and implementing diversions in the history of the master planning process. However, we hope the decision to make the diversions programmatic is one that allows CPRA to continue work on modeling and planning for a system of diversions that maximizes their coastal restoration potential. We encourage CPRA to continue to develop plans for a system of diversions that can be adaptively managed according to the appropriate triggers and operational goals. Designating diversions operations into programmatic details greatly decreases the transparency of how these projects will be operated. Communities along the Louisiana coast would benefit from more information about individual diversion projects to make decisions around their homes and livelihoods.

We request explanations regarding where the Union Diversion has landed in this iteration of the Coastal Master Plan. Unlike the Increase Atchafalaya Flow to Terrebonne Marshes project, which finds itself in the Atchafalaya Diversions program but still is identified with a project ID, Union is not called out specifically in the Upper Diversions program nor is its assigned Project ID. Therefore, additional clarification on where Union exists within the programmatic diversions would be beneficial. We are pleased to see the Increase Atchafalaya Flow to Terrebonne project called out for the Terrebonne region. This project is the only real hydrologic solution proposed for Western Terrebonne in the Master Plan, and without it, there is nothing to prevent the eventual collapse of that region's ecosystem and habitats. Therefore, continued progress on this project should remain a priority for CPRA and its partner organizations working together towards implementation.

The plan changes the previous designation of "Sediment Diversion Projects" to "Sediment Diversion Programs." We recommend CPRA provide more context around this change, for example what the specific differences in operation will be for a "diversion project" as compared to a "diversion program." Additionally, there is very limited information around how adaptive management principles will be implemented into the operations of diversions and further details on those principles would be useful to include in this section.

### *Fisheries*

The Draft CMP references the many significant considerations around fish, fisheries, and fishing-dependent communities. Healthy populations are indicators for a healthy estuary and provide an economic driver for industries, communities, and fishers (both commercial and recreational). With fisheries playing such a significant role for the environment and coastal communities, we recommend the CMP includes a standalone section that discusses fisheries in the context of the CMP planning process, public engagement and outreach, and significant project implications.



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This section should elaborate how “The ecosystem benefits provided by the plan will support commercial and recreational fisheries and wildlife across the coast and provide additional benefits to our communities” (p.15). It should also explain how input garnered from conversations with fishers and fishing dependent communities throughout the plan development (referenced p.26) was documented, evaluated, and reflected in the planning process. Lastly, it should include a specific discussion on the process for developing mitigation and stewardship actions to assist in fisheries transition. This could be discussed in terms of the completed EIS for the Mid-Barataria Sediment Diversion, as well as the expectation for future processes or projects such as the Mid-Breton Sediment Diversion.

### *Draft Master Plan Suggested Content and Specific Project Recommendations*

Glossary of Terms: We recommend the final CMP include a glossary of terms, or a primer for interested parties delving into the CMP for the first time. A glossary or “key terms” section which defines the applicable acronyms would be advantageous and improve accessibility, and a primer on reading and interpreting infographics would also foster greater understanding of the plan contents.

Frequently Asked Questions: We commend CPRA project team on the Frequently Asked Questions (FAQ) at the end of each section, and greatly appreciate the inclusion of a staff contact. We recommend a standalone “Contact Us” page where interested parties can easily find their subject matter area of interest and the appropriate CRPA staff contact or resource.

HSDRRS Visuals: The Draft Plan communicates a lack of cautionary messaging for the New Orleans metro area that is surrounded by the U.S. Army Corps of Engineers’ Hurricane & Storm Damage Risk Reduction System (HSDRRS). In map visuals, the city remains a gray area, insufficiently communicating the risk to Greater New Orleans residents. We recommend adding clearer, more direct language that discusses the risks and vulnerabilities posed for over a million people who rely on the system and the environment as the coastline changes and develops over time.

Nonstructural Interventions: Limited details are provided in the Draft Plan regarding the implementation of nonstructural interventions, such as what entities may implement such a project, or what sort of project would qualify. As sea level continues to increase, we expect there will be a larger need for nonstructural interventions, so we recommend a more detailed and focused discussion regarding the programmatic implementation of these programs and projects.

Inconsistencies with Programmatic Restoration: Some community members have shared that when they try to submit a project idea to the Coastal Wetlands Planning, Protection and Restoration Act (CWPPRA) program, the application was denied for not being consistent with the state’s master plan, when these projects would be considered programmatic restoration. To remedy instances like that, we recommend CPRA update [this document](http://coastal.la.gov/wp-content/uploads/2016/04/Master-Plan-Consistency-Guidelines-2017.pdf) (http://coastal.la.gov/wp-content/uploads/2016/04/Master-Plan-Consistency-Guidelines-2017.pdf) from 2017 on what is considered in accordance with the 2023 plan and include it in the final draft of the CMP. Furthermore, we would also encourage development of a Toolkit on how to submit a project for Master Plan consideration to encourage more stakeholder and public involvement in the creation of the 2029 plan.







### III. Deploying the Coastal Master Plan

In the upcoming years, coastal Louisiana will continue to confront the challenges of adapting to climate change and rising sea levels. The CMP is our blueprint for moving forward in a sustainable manner. Additional opportunities for restoring and protecting our coast will arise, while bolstering our economic growth, providing jobs to Louisiana residents, and providing the means to uplift our vulnerable and disadvantaged people and communities. These opportunities will best be realized by incorporating the principles of sustainability, innovation, and forward-thinking resilience found in the CMP across all of state government and through the proactive planning and action by state agencies and elected officials. In the following comments, we commend CPRA and State for identification of beneficial initiatives that will follow the adoption of the CMP, and we encourage multi-agency actions that will bolster the objectives of the CMP across the coast.

#### *Beyond the Master Plan*

We commend CPRA for the inclusion of the “Beyond the Master Plan” section of the Draft Master Plan and express our support for most of these initiatives. This section demonstrates the State’s intent to incorporate the objective of a more sustainable coast across the operations of State government and programming, while identifying key programs like the Southwest Coastal Louisiana program and CWPPRA which are key to planning and implementation efforts for coastal resilience.

The Adaptive Governance Initiative is a massive step forward in aligning the efforts and financial resources of State agencies to shared sustainability goals with the guidance of the Chief Resilience Officer and agency resilience coordinators. We believe this position is a critical role, and support efforts to ensure the permanence of the position moving forward, and in any future administration.

The Climate Initiatives Task Force has initiated a planning effort to reduce emissions and provide a cleaner future for an economically strong Louisiana to the forefront of statewide conversations and brought solutions from across the spectrum to the Louisiana Climate Action Plan. Louisiana has gained nationwide attention for this whole-state, multi-stakeholder approach to decarbonizing our state, and established a blueprint for emissions reduction; if we can align and follow through with the action items identified in the Action Plan. To monitor progress toward these emission-reduction goals and track progress and initiatives that will establish a clean energy economy in Louisiana, we recommend the Climate Initiatives Task Force, and the associated Advisory Group and committees continue their work moving forward.

#### *State Permitting Authority and Coastal Integrity*

Community members in Cameron and Plaquemines Parishes have expressed that the construction of Liquefied Natural Gas (LNG) export terminals in their communities act in opposition to the goals of the CMP. Furthermore, the future emissions potential of these export terminals seems counterintuitive to the objectives of the Climate Action Plan and the resilience stressors identified in the CMP. We understand that CPRA’s authority is limited in this area but believe the ability to determine Master Plan



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consistency is an important tool that CPRA could wield more often to help hold the Department of Natural Resources (DNR) accountable to the CMP before issuing coastal use permits. Additionally, CPRA could build on their recent successful in-lieu mitigation plan with the West Shore Lake Pontchartrain levee and Maurepas Swamp projects and more regularly propose wetland mitigation measures take place in the basin of construction, ideally through more in-lieu projects, and not move elsewhere. At minimum, CPRA should provide the public information about their CMP consistency determinations, and as feasible, develop a mechanism to accept public concerns and mitigation ideas before making consistency determinations.

### *Equity*

While we deeply commend CPRA for the extensive work and thorough improvements to this plan and its process, we would like to see CPRA consider impacts to people as a bigger focus in project selection, implementation, and operations as well as mitigation efforts, nonstructural intervention and future protection. CPRA has voiced their goal is to incorporate equity as a focus of the 2029 Master Plan, and we would like to see these initiatives start sooner so that principles and actions that put people first – inclusion in planning, transparent communications, justice, and community-driven solutions - are at the forefront of major decisions moving forward.

### IV. Closing

We appreciate the opportunity to provide the perspective of MRD in these comments and constructive improvements to the Draft Master Plan. We would like to re-emphasize our strong support of the CMP and the process CPRA has developed. The projects and programs identified in the CMP are publicly informed, backed by the best available science, and represent Louisiana's best chance for an economically vibrant, environmentally diverse, and flourishing coast.

Sincerely,

Simone Maloz

Campaign Director

Restore the Mississippi River Delta

Kristi Trail

Executive Director

Pontchartrain Conservancy





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Kimberly Davis Reyher

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Coalition to Restore Coastal Louisiana

Cathleen Berthelot

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Environmental Defense Fund

Brian Moore

Vice President, Coastal Policy

National Audubon Society

Amanda Moore

Director, Gulf Program

National Wildlife Federation



## CPRA Master Plan

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**From:** Scott Eustis  
**Sent:** Friday, March 24, 2023 7:27 PM  
**To:** CPRA Master Plan  
**Cc:** Sheehan Moore; Naomi Yoder; Matt Rota  
**Subject:** Healthy Gulf Comments on the Draft 2023 Coastal Master Plan 24 March 2023  
**Attachments:** Healthy Gulf Comments on the Draft 2023 Coastal Master Plan 24 March 2023.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

See attached for our final comments. These comments are inclusive of the LDEQ consistency comment sent earlier, just without the worksheet.

For a healthy Gulf,

Scott



Coastal Protection & Restoration Authority  
Master Plan Public Comments  
150 Terrace Avenue  
Baton Rouge LA 70802  
[masterplan@la.gov](mailto:masterplan@la.gov)

**Friday, March 24, 2023**

**RE: Healthy Gulf Comments on the Draft 2023 Coastal Master Plan**

We are writing on behalf of Healthy Gulf, a diverse coalition of more than 25,000 individual citizens and local, regional, and national organizations committed to providing the research, communications, and coalition-building tools needed to reverse the long pattern of over-exploitation of the Gulf of Mexico's natural resources.

As always, we welcome the Coastal Protection and Restoration Authority's (CPRA) efforts at engaging Louisianans in a science-based planning process aimed at restoring wetlands and working together towards a sustainable coast. In what follows, we offer our recommendations based on the draft of the 2023 Coastal Master Plan.

**I. CPRA must put local, community-led non-structural risk reduction at the center of the Coastal Master Plan**

Flood protection and restoration projects are important parts of protecting our coast. But more than anything, Louisianans need clear, material commitments from the state to support communities in developing non-structural adaptations to coastal land loss. In the draft Master Plan, CPRA acknowledges the importance of these measures and allocates almost a quarter of its \$50 billion figure to them. We note this increase compared to the 2017 Master Plan, from \$6 billion to \$11 billion. However, CPRA fails to advance a clear plan for how this will go forward, largely punting the issue to other agencies. CPRA should provide incentives for community-level approaches to elevation, flood-proofing, relocation, and other initiatives, prioritizing those who are most at risk and low-income residents. This means leveraging CPRA and state financial resources towards community-wide approaches, encouraging and concretely supporting neighbors as they take action together to preserve the character and function of coastal neighborhoods as they take steps to improve collective resiliency *meaningfully*. Residents need to know their options, as well as what the state is planning to do to help beyond just technical solutions or top-down resettlement projects. *Given FEMA and OCD's history of discriminatory practices in hazard mitigation, CPRA will likely play a critical role in Louisiana's ability to comply with federal Justice40 policies<sup>1</sup>.*

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<sup>1</sup>Justice40:



In order for communities in South Louisiana to thrive, there must be a predictable response from CPRA and Louisiana in the wake of future hurricanes. If CPRA prioritizes supporting community response and rebuilding plans now, before the next hurricanes, then communities will be able to make decisions after hurricanes. Further, these plans must be backed by funds that can support elevation, flood proofing, and relocation before and after the next hurricanes.

## **II. CPRA must deepen its commitment to make consistency part of its planning**

Louisiana law empowers CPRA leadership, through the Governor's Office of Coastal Activities, to ensure that coastal development is consistent with the Master Plan.<sup>2</sup> CPRA names consistency as its first principle,<sup>3</sup> and links to the 2016 executive order requiring all state agencies to operate their regulatory and other activities “in a manner consistent with the Coastal Master Plan and public interest.”<sup>4</sup> Louisiana’s coastal environment is under assault not just from rising seas and intensifying storms, but from destructive industrial development past, present, and future – development that happens with state permits, the large majority of which go unchallenged and unchanged by CPRA. The Master Plan is ineffective without enforcement and protection of the vision it advances; it is incomplete so long as it contains only lists of projects with no plan for the proactive defense of Louisianans’ air, land, and water. Accordingly, we call on the agency to prevent wetlands destruction, get serious about local drivers of climate change, and oppose projects that propose the “beneficial use of dredged material” in CPRA project areas.

### **A. CPRA must prevent the destruction of currently existing wetlands**

While we applaud CPRA's efforts to improve the coast by building thousands of acres of wetlands and creating marsh and better drainage, CPRA needs to also use its authority to prevent destructive new coastal development. CPRA consults on “Coastal Use Permits” (CUPs) issued by the Louisiana Department of Natural Resources (LDNR). CPRA has never used its authority to intervene to block a wetlands-destroying project. Many of these Coastal Use Permits authorize the destruction of wetlands at the hands of fossil fuel facilities, which only adds to changes in the climate that are raising sea levels, intensifying hurricanes, and driving more land loss in the region. For instance, in southwest Louisiana, the proposed CP2 LNG terminal and the CP Express pipeline would require over 2,000 acres of land for their construction.<sup>5</sup> The Commonwealth LNG project in Cameron Parish will impact 139.5 acres of wetlands, with 89.9 acres of

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A WHOLE-OF-GOVERNMENT INITIATIVE <https://www.whitehouse.gov/environmentaljustice/justice40/>

<sup>2</sup> [RS 49:214.3.1](#)

<sup>3</sup> <https://coastal.la.gov/principles/>

<sup>4</sup> [Executive Order No. JBE 2016-09](#)

<sup>5</sup> See CP2 LNG and CP Express Draft Environmental Impact Statement: <https://elibrary.ferc.gov/eLibrary/filedownload?fileid=C947EEA7-0E58-CF44-86C2-85CB1EF00000>. Construction would impact 674 acres of wetlands, and the projects would permanently destroy 281 acres of wetlands.



permanent impacts.<sup>6</sup> And practically speaking, these facilities get in the way of the projects that CPRA has deemed vital. For example, the area of the Mud Lake Marsh Creation project (210) directly overlays the proposed Commonwealth LNG export terminal and its pipeline. Preventing this LNG terminal and others like it from being built *must* be a priority for CPRA, given the simplest definition of consistency. ***We request these projects be declared inconsistent.***

CPRA has the authority to intervene in fastland designations, and determinations that massive coastal wetland impacts do not require a coastal permit. CPRA must review these determinations. In 2006, just before he became a Parish President, the Lieutenant Governor requested a fastland designation for his plantation property, even though there had never been a levee around Citrus Lands<sup>7</sup>, and Citrus Lands has been, in fact, the drainage corridor for West Bank Plaquemines after hurricanes<sup>8</sup>. For example, Lafitte is not considered Fastland, even though it has a levee<sup>9</sup>. This enabled the Lt Governor to flip a low-value-per acre plantation into a massive piece of industrial real estate<sup>10</sup>, and borrow pit companies to make billions hauling dirt without a coastal use permit, or mitigating wetlands in CPRA project areas. This real estate decision has cost the state millions<sup>11</sup> in wetland mitigation and CPRA project funding, severely impacting CPRA funding. Intervention in this 'fastlands' designation could have funded the Grande Cheniere Ridge Marsh Creation Project (BA-0240)<sup>12</sup>. ***We request that CPRA reverse LDNR Local Coastal Program's arbitrary decision to designate Citrus Lands fastlands.***

Why is Louisiana authorizing wetlands destruction while investing millions in taxpayer dollars to build them back? CPRA needs to see that existing wetlands *preservation* is as important a strategy for coastal protection as building *new* wetlands. That means taking a stance to oppose and intervene against new coastal development that is at odds with its mission. CPRA's default position, and the position of the Coastal Master Plan, must be to deny permits that would destroy wetlands, especially in areas where the State is actively attempting to build, restore, or preserve them.

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<sup>6</sup> See Commonwealth LNG Draft Environmental Impact Statement, Appendix C:

[https://elibrary.ferc.gov/eLibrary/docinfo?accession\\_number=20220909-3017](https://elibrary.ferc.gov/eLibrary/docinfo?accession_number=20220909-3017)

<sup>7</sup> LDNR Doc ID 110336828, 08/26/2022 <https://srfxprod.dnr.state.la.us/dnrservices/redirectUrl.jsp?DocID=110336728&sysType=1>

<sup>8</sup> Gustav and Ike – "Three (3) breaches were caused by Hurricanes Gustav and Ike, and four (4) were manmade to drain the water from the parish after the storms." Plaquemines Parish Government Coastal Use Permit P20090229

[https://sonlite.dnr.state.la.us/sundown/cart\\_prod/cart\\_cmd\\_permit.cart\\_permit\\_frame?pcup\\_num=P20090229](https://sonlite.dnr.state.la.us/sundown/cart_prod/cart_cmd_permit.cart_permit_frame?pcup_num=P20090229)

<sup>9</sup> Screen Capture of LDNR fastlands Nov 2022 This is a true screen capture of the SONRIS GIS Nov 4th, 2022, showing the "Fastlands" layer, the "Populated Areas" Layer, and the 2016 CIR Aerial Photo. Citrus Lands (District 7 Plaquemines) has been considered "fastlands" since August 2006, while Lafitte, a populated area with a levee system, is not considered fastlands.

[https://live.staticflickr.com/65535/52476667541\\_3686cde486\\_k.jpg](https://live.staticflickr.com/65535/52476667541_3686cde486_k.jpg)

<sup>10</sup> 1616913 PLAQUEMINES LAND VENTURES LLC 1001 19TH ST NORTH, SUITE 1500 ARLINGTON VA 22209 Purchased Parcel from Duckland LLC Jan 20th, 2022.

<sup>11</sup> Key program for coastal restoration is spending millions on forests instead

"They are basically going the cheap route because bottomland hardwood is just so much cheaper than marsh restoration."

<https://www.wvtv.com/article/news/investigations/david-hammer/key-program-for-coastal-restoration-is-spending-millions-on-forests-instead/289-9730a373-6670-4017-85da-148a9df870d6>

<sup>12</sup> P20200522. Proposed restoration of approx. 624 acres of marsh habitat and establish approx. 12,700 linear feet of ridge habitat for the Grande Cheniere Ridge Marsh Creation (BA-0240),



## **B. CPRA should consider threats to the climate as threats to the coast**

In addition to directly destroying wetlands, coastal development in Louisiana for oil and gas extraction, processing, and transport also contributes to changes in the climate. Louisiana is a national hub for petroleum products that produce harmful greenhouse gasses here in the state as well as upstream and downstream, cradle to grave. These emissions lead to rising sea levels, intensifying hurricanes, and increased rainfall and flood risk for Louisiana. CPRA knows about climate change and this Master Plan is full of references to the threats it poses to the coast. However, it's largely treated as an externality, not something that industrial facilities in Louisiana are contributing to and exacerbating. CPRA expresses a passing hope that the Master Plan might be a "catalyst" for necessary greenhouse gas reductions<sup>13</sup> but relegates a section on Climate Initiatives Task Force to things "Beyond the Master Plan."

We disagree that targeting emissions reduction is beyond the scope of CPRA's activities. Without taking a meaningful position on Louisiana's polluters, no matter how politically delicate, CPRA's projects are only band-aids on a set of problems that show no sign of slowing. This means, in part, intervening forcefully against projects with excessive emissions. For instance, the Commonwealth LNG project currently seeking a Coastal Use Permit from LDNR would emit over 3.5 million tons of greenhouse gasses – in addition to harmful compounds that impact our air quality locally. The total emissions of ten LNG Export facilities found on LDEQ's EDMS is 67 MT CO<sub>2</sub>e per year, which would be a 48% increase of Louisiana's 2018 FLIGHT emissions from refineries stated to operate for 50 years.

Louisiana is disappearing, disintegrating from the inside out. CPRA had very high ambitions in 2007 and especially after 2012, and has achieved much, given it was given the Authority to tackle the conflicts between state agencies –levee districts, the department of transportation, as well as Office of Coastal Management decisions on wetlands.

**In 2023, CPRA must extend consistency review to LDEQ Air Permits for major petrochemical facilities–facilities that would be included in the EPA's FLIGHT data as major carbon dioxide polluters.**

In 2012, Native leaders like Chief Thomas Dardar and Elder Rosina Philippe were on the cover of the Louisiana Coastal Master Plan document. In 2020, Elder Rosina<sup>14</sup> petitioned the UN on the matter that Louisiana was committing forced displacement due to its lack of action on climate action. Although CPRA has been in discussion with Grand Bayou Atakapas / Ishak Chawasha, there remains much more to be done.

The Governor's Climate Task Force has described the impacts of climate change, on our wetlands, as well as a bare minimum of hope for our coast, our food, and our

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<sup>13</sup> Draft 2023 Coastal Master Plan, p.74

<sup>14</sup> 2020 Louisiana Native UN Complaint Final abridged Grand Bayou.pdf  
[https://drive.google.com/file/d/1ciM08oDm5gEPhljK01pQG03SnKz\\_uJ0V/view?usp=sharing](https://drive.google.com/file/d/1ciM08oDm5gEPhljK01pQG03SnKz_uJ0V/view?usp=sharing)





shelter. CPRA has a unique authority to incorporate the science of the task review climate emission permits that significantly impact its projects<sup>15</sup>.

*The impacts to people being felt today in Louisiana include direct physical, mental, and financial tolls from extreme weather and indirect impacts to social systems and infrastructure that is struggling to cope with the increasing prevalence and severity of natural disasters. As is the case globally, Louisiana's low-income communities, communities of color, Indigenous people, and other marginalized residents are being hit especially hard because they are more likely to live in areas vulnerable to extreme weather and are typically less financially able to take on the economic challenges of recovery or relocation. These groups have been excluded from the opportunity to build wealth for generations, are more likely to live and work in overburdened communities, are more likely to live in areas with higher flood risk, and are more likely to experience insufficient or delayed investments in infrastructure and disaster recovery efforts.*<sup>16</sup>

Despite the goals of the LA Climate Task Force, Large Petrochemical facilities would increase Louisiana's major 2018 GHG emissions<sup>17</sup> by half or more. Louisiana's petrochemical emissions, such as the Proposed Formosa Plastics Plant ("aka FG LA"), and the emissions from LNG exports, are large enough to impact coastal wetlands around the world. Formosa's permitted (not lifecycle) emissions are over 13MT CO<sub>2</sub>e<sup>18</sup>, representing 8.9% of Louisiana's 2018 FLIGHT emissions. They will certainly affect CPRA's coastal projects. The new Ammonia facilities (Air Products, Nutrien, CF Industries, etc) proposed for "Carbon Capture" will also be major sources of carbon dioxide **increases** in the state, despite the deceptive branding. LNG Export proposals are numerous in the Coastal Zone, and 10<sup>19</sup> of these projects would emit over 67 MT CO<sub>2</sub>e annually for the next 50 years.

Petrochemical plants constituted 79%<sup>20</sup> of Louisiana's industrial and power emissions, as of 2018. Louisiana is 4.1% of USA emissions (1990-2018)<sup>21</sup>, and USA

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<sup>15</sup> RS 49:214.3.1(B)(2)(d) Review and modify proposed coastal use permits prior to issuance to the extent that such permits would authorize activities which significantly affect integrated coastal protection projects or which significantly diminish the benefits of projects intended to protect, conserve or enhance coastal areas and to require the issuance of permits for public or private integrated coastal protection projects or plans. <https://www.legis.la.gov/legis/Law.aspx?p=y&d=672063>

<sup>16</sup> Louisiana Climate Action Plan, 2022, page 19, "The Risks of Inaction"

<sup>17</sup> Data Extracted from EPA's FLIGHT Tool (<http://ghgdata.epa.gov/ghgp>)

<sup>18</sup> Doc 11454855 <https://edms.deq.louisiana.gov/app/doc/view?doc=11454855>

<sup>19</sup> LDEQ EDMS, AI Numbers-99407 Cameron LNG LLC - Cameron LNG Facility, 119267 Sabine Pass LNG LP - Sabine Pass Liquefaction LLC, 185639 Magnolia LNG LLC - Magnolia LNG Facility, 191665 Cheniere Energy Inc/Sabine Pass LNG, 194203 Venture Global Calcasieu Pass LLC - Calcasieu Pass LNG Project, 197379 Venture Global Plaquemines LNG LLC - Plaquemines LNG Project, 201334 Driftwood LNG LLC, 218335 Venture Global Delta LNG LLC - Delta LNG Project, 221642 Commonwealth LNG LLC - Commonwealth LNG & Pipeline Project, 232172 Venture Global CP2 LNG LLC - CP2 LNG Terminal

<sup>20</sup> Louisiana Climate Action Plan, 2022, page 11, Figure 4.

<sup>21</sup> Louisiana 2021 GHG Inventory. Prepared on behalf of the Governor's Office of Coastal Activities David E. Dismukes, Ph.D., LSU Center for Energy Studies  
[https://www.lsu.edu/ces/publications/2021/louisiana-2021-greenhouse-gas-inventory-df-rev\\_reduced.pdf](https://www.lsu.edu/ces/publications/2021/louisiana-2021-greenhouse-gas-inventory-df-rev_reduced.pdf)



emissions are roughly 18% of Global emissions (1990-2018)<sup>22</sup>. Assuming these trends stabilize or worsen, which seems likely, Formosa's emissions are  $0.0892 * (0.8 * 0.79 * 0.041 * 0.18)$  of global emissions. If global sea level rise is responsible for 80% of relative water rise across the state,<sup>23</sup> Formosa is thus, at least, liable for  $0.0892 * (0.00466416)$  of the wetlands lost via changed climate forces.

Similarly, LNG plants will emit 67 MT CO<sub>2</sub>e, over the next 50 years, according to a review of LDEQ AIs listed. This represents a 48% increase. And makes LNG companies liable for  $(0.3277 * 0.00466416)$  of the wetlands lost via changed climate forces –many of which are wetlands restored as CPRA projects.

There are thousands of acres of wetlands drowned because of the fossil gas plants we have. We can't afford any more wetlands for fossil fuel plants. Even in the 1990s, sea level rise was visible as regional waterlogging in the lower Barataria Terrebonne Estuary, and at 21,069 acres according to the USGS evaluation of Deltaic wetlands loss<sup>24</sup>. Even if we froze our projection of the impact of the heating, rising sea at what has happened in the past, **Formosa, at 8.9%, would still be liable for some 8.77 acres of land loss, even if sea level rise does not increase at all.** LNG export proposals would be liable for **32.21 acres**. These are already large impacts, under the LDNR OCM NAJ guidelines<sup>25</sup>. These impacts require avoidance and mitigation, assuming no increase in sea level rise.

But CPRA has stated that the vast majority (75%, or 3,090 square miles / 1.977 million acres<sup>26</sup>) of the loss of up to another 4,120 square miles<sup>27</sup> of coastal wetland can be attributed to sea level rise, largely<sup>28</sup> from Formosa's and other's CO<sub>2</sub>e pollution.

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<sup>22</sup> EDGAR average over six time series, 1990 - 2018 to match the Dismukes analysis.

[https://edgar.jrc.ec.europa.eu/country\\_profile/USA](https://edgar.jrc.ec.europa.eu/country_profile/USA)

<sup>23</sup> August 3, 2016, Governor's Advisory Commission on Coastal Protection, Restoration, and Conservation August 3, 2016 - 2017 Coastal Master Plan Planning for an Uncertain Future 2017 Coastal Master Plan\_GAC\_8-3-1 - Karim Belhadjali.pdf at

<https://cims.coastal.louisiana.gov/recorddetail.aspx?root=0&sid=18787>

<sup>24</sup> Process Classification of Coastal Land Loss between 1932 and 1990 in the Mississippi River Delta Plain, Southeastern Louisiana Shea Penland, Department of Geology and Geophysics, University of New Orleans, New Orleans, LA 70148 <https://pubs.usgs.gov/of/2000/of00-418/ofr00-418.pdf>

<sup>25</sup> [http://data.dnr.louisiana.gov/ABP-GIS/ABPstatusreport/NAJ\\_Combined\\_Document\\_5\\_10\\_2013.pdf](http://data.dnr.louisiana.gov/ABP-GIS/ABPstatusreport/NAJ_Combined_Document_5_10_2013.pdf)

<sup>26</sup> "Haase said state land-loss modeling concluded that 75% of the marsh loss [modeled from 2017 to 2067] was attributed to rising water levels" "We're screwed": The only question is how quickly Louisiana wetlands will vanish, study says BY MARK SCHLEIFSTEIN | STAFF WRITER PUBLISHED MAY 22, 2020 AT 1:00 PM

[https://www.nola.com/news/environment/article\\_577f61aa-9c26-11ea-8800-0707002d333a.html](https://www.nola.com/news/environment/article_577f61aa-9c26-11ea-8800-0707002d333a.html)

<sup>27</sup> <https://coastal.la.gov/whats-at-stake/a-changing-landscape/>

<sup>28</sup> Over 80%, based on 2017 Coastal Master Plan Planning for an Uncertain Future 2017 Coastal Master Plan\_GAC\_8-3-1 - Karim Belhadjali





Marsh disintegration from regional waterlogging forces, south of Bayou Grande Cheniere, Plaquemines Parish, 2019.

Formosa's 8.9% of 80% of 79% of 4.1% of 18% of 3,090 square miles is 1.28 square miles or **823 acres of land lost to the Gulf**, from the water increasingly swollen by Formosa's carbon pollution. As we doubt Formosa will be in operation through 2067, to sustain 8.9% of state emissions, so the acreage of wetland loss from the Formosa plant lies somewhere in between—but it is not zero. On the other hand, LNG Export proposals have all announced that their project life is 50 years<sup>29</sup>. Therefore, the Louisiana wetlands drowned by LNG Export CO<sub>2</sub>e is closer to  $(0.3277 * 0.00466416 * 3090) = 4.72$  square miles, or **3,023 acres**. This is a crisis. *The full police power of the state shall be exercised to address the loss and devastation to the state and individuals arising from hurricanes, storm surges and flooding and to address the rapid, ongoing, and catastrophic loss of coastal Louisiana in order to devote the maximum resources of the state to meet these immediate and compelling public necessities of integrated coastal protection.* (La R.S. 49:214.5.6)

<sup>29</sup> Elizabeth Dolezal, VP of Regulatory Affairs, personal communication, CP2 LNG Hearing, Vinton, LA, 2023



***After reviewing CO<sub>2</sub>e emissions in LDEQ Title V permit applications for consistency, CPRA must enumerate the acres of wetlands drowned from by major carbon polluters over the current planning period before any air permit can be issued.*** LDEQ cannot permit this air pollution, which erases Louisiana from the map, until such an assessment is completed.

Assessing these climate pollution impacts to Louisiana's wetlands and CPRA's projects is the most authoritative way for Louisiana to comply with 2021 federal executive orders on the climate<sup>30</sup> consistent with the latest 2023 guidance from US CEQ<sup>31</sup>.

Louisiana's coastal land loss crisis is a climate justice issue, and CPRA is ahead of many federal agencies in assessing problems and creating solutions to climate justice issues. CPRA simply does not act enough. CPRA has the duty and opportunity to act; it has the authority and the financial interest, as well as an advanced, science-based implementation strategy. The state has the final say on projects like these that threaten to increase the world's dependence on fossil fuels and accelerate climate change and the destruction of CPRA projects. ***CPRA needs to analyze and describe to agencies like LA OCD, LDNR and LDEQ to make it clear that major fossil fuel projects are not consistent with coastal protection. In fact, they're a major driver of coastal land loss, including cultural and economic loss, to date and into the future.***

### **C. CPRA should oppose the “Beneficial Use of Dredged Material” in restoration areas dredging from industrial areas.**

While beneficial use of dredge materials, especially from the Mississippi River, where relatively clean sediment is accreted, Sediment dredged from industrial waterways with contaminated sediment should not be used for Beneficial Use.

For example, right now CP2 LNG ([P20211131](#)) and Commonwealth LNG ([P20190900](#)) both have Coastal Use Permits that would deliver dredged and excavated sediment from the bottom and banks of the Calcasieu River and Ship Channel onto the [south-southeast bank of Calcasieu Lake](#) into the area planned for Calcasieu Ship Channel Marsh Creation (228).

This is against the rigorous planning and environmental assessment conducted for the CS-78 No Name Bayou Marsh Creation CWPPRA project ([P20220440](#))<sup>32</sup>, which

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<sup>30</sup> Section 2(e) Executive Order 13990 on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis  
<https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-protecting-public-health-and-environment-and-restoring-science-to-tackle-climate-crisis/>

<sup>31</sup> Guidance on Consideration of Greenhouse Gas Emissions and Climate Change. CEQ  
[https://obamawhitehouse.archives.gov/sites/whitehouse.gov/files/documents/nepa\\_final\\_ghg\\_guidance.pdf](https://obamawhitehouse.archives.gov/sites/whitehouse.gov/files/documents/nepa_final_ghg_guidance.pdf)

<sup>32</sup>No Name Bayou CS-78 <https://lacoast.gov/new/projects/Info.aspx?num=CS-78>



carefully sourced its material from Lake Calcasieu in a manner to avoid the impacts to fisheries that CP2 LNG and Commonwealth LNG are recklessly damaging.

The sediments from the Calcasieu Ship Channel must be rigorously tested for toxins - it would be an exceptionally bad idea to transpose toxic sediments (and resuspend toxins in the process) into an area of ecological restoration. Similarly, Driftwood LNG plans to pipe sediment from its dock excavation and land clearing into a beneficial use of dredged material area that is hydrologically connected to the West Brown Lake Marsh Creation project. ***CPRA must use its authority to make these projects consistent with the Master Plan.***

### **III. CPRA should discuss coastal litigation as a funding source and identify projects that would benefit from it**

Louisiana is home to tens of thousands of former oil and gas employees, their families, and their communities. The "working coast" is no longer working, and soon, it will be much less of a coast. There were less than 100 wells drilled across the state in 2022<sup>33</sup>, and offshore activity has been lowered considerably by competition from onshore fracking in 2013. Despite Scott Angelle's recent directorship of BSEE, and his promises to drill the industry's way back to prominence, the oil industry's damages to the state have outweighed its benefits for over a decade, and the decline shows no sign of slowing.

Many of us in the state know, better than the companies themselves, the ecological damages that oil and gas have wreaked on state's coastal wetlands in the past three generations. It is past time that CPRA admitted this in public view, because most of the ecological restoration CPRA conducts is merely the repair of old oil fields, oil fields currently subject to coastal litigation<sup>34</sup>.

CPRA is already releasing some numbers on how litigation against oil companies is rebuilding the coast, even if we have to read between the lines. According to the CPRA Annual Plan 2024, Table 12<sup>35</sup>, over 66% of the funding for CPRA came from coastal litigation, namely against Transocean and BP, and others. Although much is made of offshore revenue contributions, such funding provided less than State spending into the program.

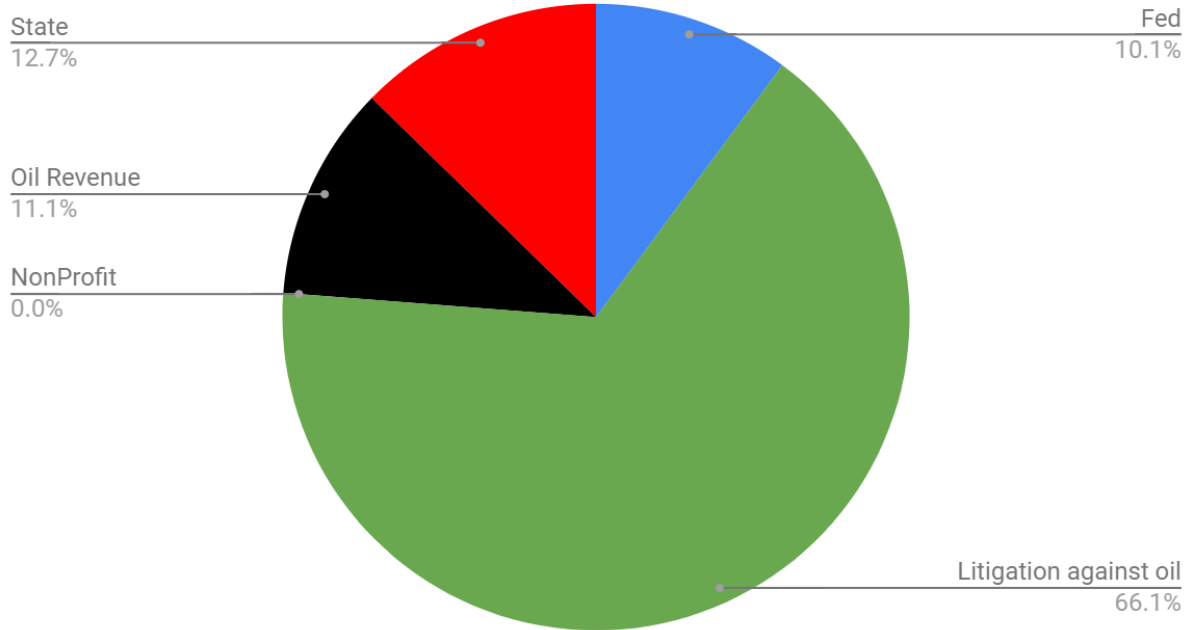
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<sup>33</sup> SONRIS.com, shapefile 8866.zip, Oil and Gas Wells

<sup>34</sup> [U.S. Supreme Court declines to hear oil firms' appeal of coastal lawsuit ruling BY MARK SCHLEIFSTEIN | Staff writer Feb 28, 2023](#)

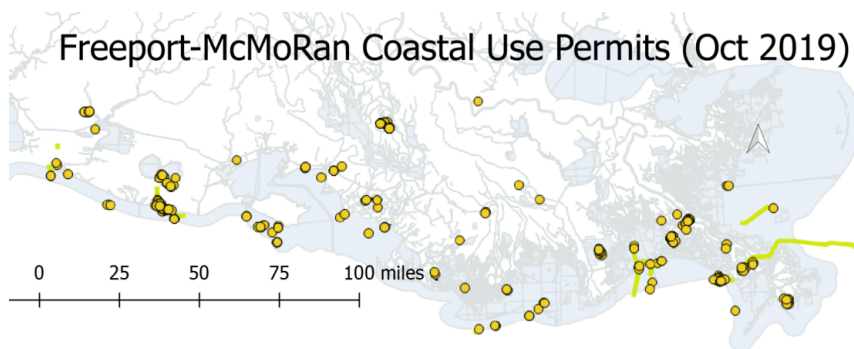
<sup>35</sup>TABLE 12: PROJECTED THREE-YEAR REVENUES (FY 2022 - 2024)  
[https://coastal.la.gov/wp-content/uploads/2023/01/CPRA\\_FY24-AP\\_Draft\\_proof.pdf](https://coastal.la.gov/wp-content/uploads/2023/01/CPRA_FY24-AP_Draft_proof.pdf)

## CPRA FY 24 Three Year Expenditures 2024-2026



Summary of [Annual Plan FY 2024](#), Page 101, Table 12 Projected Expenditures, \$4.6 Billion

Although their contribution to Louisiana's land loss was not as large as many companies, Freeport McMoran has recently settled with the State and Parishes for \$100 Million<sup>36</sup> over 22 years. Freeport's impact to the coast was more limited than the impact of many companies.

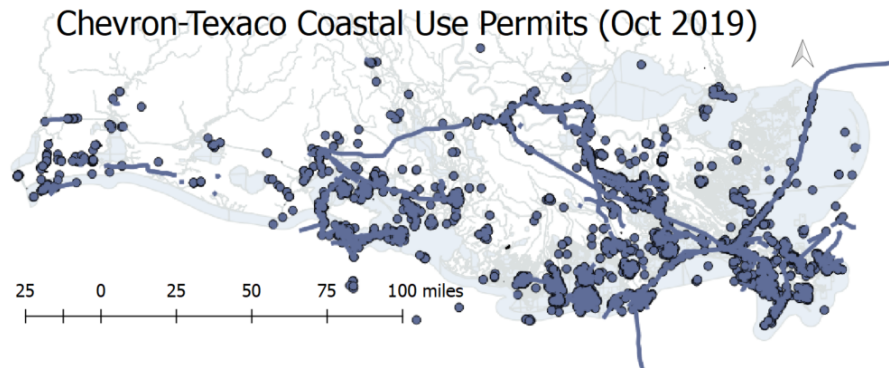


Freeport McMoRan Coastal Use Permits, Oct 2019, SONRIS.com

<sup>36</sup> [Deal reached in \\$100 million settlement with Freeport over decades of coastal damage](#)  
BY TRISTAN BAURICK | Staff writer Oct 25, 2022



Although much public uncertainty exists regarding the fate of the expenditures over 22 years, CPRA has a history of following and publishing these parish projects in its master plan and annual plans. CPRA will also have to determine the consistency of these expenditures with the State Master Plan in such time.



Chevron-Texaco Coastal Use Permits, Oct 2019, SONRIS.com

***CPRA has a unique role and duty to communicate the benefits of coastal litigation against the companies, and must communicate to the public how these parish monies are being spent, consistent with the Master Plan, as CPRA communicates the expenditures from the BP litigation.***

The Louisiana law that established CPRA reads, in part, “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.” Most of our recommendations boil down to this. CPRA’s work cannot be confined to the technocratic work of modeling environmental scenarios and recommending projects. If millions of taxpayer dollars are going to wetlands restoration and risk reduction projects, then CPRA also needs to protect that investment. It should name names when it sees companies acting in bad faith to continue destroying our coast for profit, intervene in those projects getting permits to ensure their consistency with the Master Plan, and lay out a clear path to a just and protected coast for Louisianans.



For a Healthy Gulf [sent via email],

A handwritten signature in black ink that reads "Naomi Yoder".

**Naomi Yoder**  
Staff Scientist  
Healthy Gulf

A handwritten signature in black ink that reads "Sheehan Moore".

**Sheehan Moore**  
Research Volunteer  
Healthy Gulf

A handwritten signature in black ink that reads "Scott Eustis".

**Scott Eustis**  
Community Science Director  
Healthy Gulf

A handwritten signature in blue ink that reads "Matt Rota".

**Matt Rota**  
Senior Policy Director  
Healthy Gulf



## CPRA Master Plan

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**From:** Andrew Brien  
**Sent:** Friday, March 24, 2023 8:35 PM  
**To:** CPRA Master Plan  
**Subject:** 2023 Draft Coastal Master Plan

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Dear CPRA,

As someone who has spent the overwhelming majority of my life living in Southeast Louisiana and often traveled south on LA-1 to Grand Isle, I have been a first-hand witness to the coastal land loss and how it has affected the great state of Louisiana. I therefore write to provide my support for the 2023 Draft Coastal Master Plan.

One of the most significant and urgent issues facing our state is the loss of our coast. We must act to advance a safer, flourishing, more equitable coast for Louisiana's communities, ecosystems, and economy. The state has made significant progress in implementing restoration projects across our coast. We must continue to move forward on building and sustaining the Mississippi River Delta and our entire coast to ensure a better future for Louisiana.

I support the Master Plan process, as it is publicly informed, grounded in the best available science, balances coastal restoration with protection, and is realistic about the challenges we face. Louisiana's process for the Master Plan should serve as a model for how to involve experts, community residents, and other stakeholders in the decision process grounded in science. Scientists, landowners, federal agencies, and community leaders on the Coastal Advisory Team and multiple regional working groups, along with comments and submissions from the public and input contributed during multiple series of open community meetings, all informed what ultimately ended up in the draft plan. I appreciate that the Coastal Master Plan Viewer was released at the same time as the draft Plan to give people the opportunity to explore restoration and risk-reduction projects in their own backyard. An important issue in our fight for the coast is public education, and the Viewer does just that by providing a plethora of information to anyone with an internet connection.

We need to put our existing funding resources to work wisely -- and quickly -- and secure additional resources to maintain as much of Louisiana as possible. The Master Plan addresses our resource limitations by prioritizing projects that will have the greatest impact and save the most land over time. As the steady revenue stream from the Deepwater Horizon settlement is spent, the people of Louisiana and its leaders must develop additional and dependable revenue streams and cost-saving opportunities, such as bonding for projects, to fund the master plan in its entirety.

The state should take advantage of the tremendous economic and job creation opportunities available by advancing the Master Plan. The coastal economy is estimated to create 26,000 jobs in our region, most of them being high-wage, high-demand positions. Partnerships between regional businesses and education programs are filling the pipeline for these skilled jobs. A talented workforce is ready and able to build our future. Investing in our local workforce is the best way to grow our regional tax base, a thriving economy, and our long-term economic health.

Regarding specific projects, I support the strategic use of marsh creation, landbridges, ridges, and other restoration projects that can reduce storm surge damage, and I support investments in levees and other risk-reduction measures in our region.

Thank you for your time, efforts, and attention to this significantly important issue.

Sincerely,

Andrew J. Brien  
Attorney  
(985) 859-8438  
[McDowell Hetherington](#)  
[LinkedIn](#)



## CPRA Master Plan

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**From:** Michael Biros  
**Sent:** Friday, March 24, 2023 11:15 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment

**EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.**

I am writing to express my support for the 2023 Draft Coastal Masterplan (CMP) with a few suggestions for areas that CPRA and the State should work to improve.

The CMP is a world-class document based on years of science that has been refined and adapted over the years. From a scientific standpoint, it is robust and grounded in the best available numerical modeling, geosciences, and estuarine science. I strongly urge the State to adopt it and work diligently towards its full funding and implementation.

However the following are a few points that I would to see addressed:

The most critical variable determining the success or failure of the CMP is not funding, sediment budgets, or subsidence rates. It's carbon emissions. If emissions continue to rise, the CMP is most certainly primed for failure. If emissions fall, the CMP has a chance to succeed. There is no amount of restoration or mitigation funding that can offset the impact of rapid sea level rise/wetland loss due to continued increasing carbon emissions. Since this fundamental truth is so foundational to the issue at hand, the CMP should lead with this. By not giving this fact prominence proportional to it's weight, the CMP falls short on the single most important factor that everything else hinges on.

No matter how politically fraught the issue of decarbonization is in this oil producing state, the science on this matter is abundantly clear. We must rapidly decarbonize to restore coastal Louisiana. The issues are attached at the hip. Anything less is effectively climate denial.

This should take primacy over all other components of the plan. It should be coordinated lockstep with the State's Climate Action Plan. I'm not naive to the challenges of such a stance, but this is an existential threat and our state leadership, despite the great progress that has been made, have failed to overcome the political forces that are writing the carbon fueled death sentence for our treasured bayou communities. We must rise to the occasion and act like it's an emergency. We are still far too complacent.

Whenever I drive down Plaquemines Parish, the irony of a massive investment in the LNG export facility adjacent to the future Mid-Barataria Sediment Diversion hits me like a brick. If CPRA has the mandate to protect and restore the coast, and new investments in fossil fuels will lead to higher emission scenarios that threaten the coast, CPRA should use it's authority to prevent these types of maladaptive, carbon intensive infrastructure projects from being approved.

We need to rapidly diversify our economy to ensure the communities that depend on oil & gas are not left behind. We need to rapidly phase out carbon intensive industries and incentivize clean, renewable industries in their place. CPRA should be coordinating with other state agencies to ensure that the most vulnerable communities have an economic future and are not left behind in the 20th century.

Another tough issue that the CMP should address is that of planning horizons and sunk costs associated with risk reduction systems. Levees are expensive and should be extremely cautiously considered before they are approved, yet all levels of our government seem to be rushing to build them wherever they can. Once a levee is built, it severs connectivity and creates a barrier. There's an inside and outside where what once was a gradient. This line is permanent, expensive and carbon intensive. By definition, they are maladaptive. They exert control on the landscape, and cannot adapt to changing conditions.

Levees also tend to cultivate complacency and when they fail, they fail catastrophically. They may buy our most vulnerable communities time, perhaps a generation or two. But what happens afterwards, when the land inside has subsided, the pumps must be fueled and maintained, and the levee needs to be lifted every few years? We must expand the horizons of our planning efforts to avoid creating sunk costs that future generations will be burdened by. CPRA should direct more funding into non-structural risk reduction and be much more judicious with recommendations for structural risk reduction projects. We should have less levees that meet higher design standards, have financing mechanisms in place to cover future maintenance costs, and be reserved only for pockets of areas with population densities great enough to justify the financial and ecological costs. They should be designed with ecological connectivity in mind. Within leveed areas, local zoning and land use regulations should be encouraged to promote green infrastructure, permeability, high water tables, and high BFE's. And in some rural leveed areas that have already depopulated, CPRA should seriously consider levee decommissioning and consolidation.

Much of the decisions around coastal protection and restoration is driven in part by fear and nostalgia. We are afraid of the future and seek to hold on to a version of the past. We want to lock things in place, in time and space. This is fundamentally in opposition to the nature of life in a delta where change is constant. We must work to connect our built environment to the fundamental truths of our deltaic landscape and not double down on systems of extraction and control that lock us in deeper.

Ultimately we must work towards a long-term vision of the future where floods are not only an acceptable part of life here, but they are welcomed. Every particle of sediment beneath us was deposited here at some point be a flood. We must reconnect to that truth if we want to live on a delta that is alive.

Sincerely,

Michael Biros  
4524 N Robertson St  
New Orleans, LA 70117

## CPRA Master Plan

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**From:** Jim Solesky  
**Sent:** Saturday, March 25, 2023 10:59 AM  
**To:** CPRA Master Plan  
**Subject:** RE: Watermark

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Good morning,

Please do reach out to us for approval options for upcoming funding rounds this Spring season.

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- Credit Lines – Working Capital
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Have an extraordinary weekend.

Thank you,

Jim Solesky, Managing Partner  
Office: (917) 267-9470 | [My LinkedIn](#)  
1 Bryant Park | Bank of America Tower  
New York, NY, United States 10036  
[www.Brex.com/Watermark](http://www.Brex.com/Watermark)



**WATERMARK FINANCE**

## CPRA Master Plan

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**From:** Stacy Ortego  
**Sent:** Saturday, March 25, 2023 11:03 AM  
**To:** CPRA Master Plan  
**Subject:** LWF Comments on Draft 2023 Coastal Master Plan  
**Attachments:** LWF Comments\_Draft 2023 Coastal Master Plan.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Good morning,

Attached are Louisiana Wildlife Federation's official comments on the draft 2023 Coastal Master Plan. Thank you for the opportunity to submit these comments.

Best,

Stacy Ortego  
Coastal Policy Manager  
Louisiana Wildlife Federation  
PO Box 65239  
Baton Rouge, LA 70896  
337-351-3973 (m)  
225-344-6707 (o)  
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## LOUISIANA WILDLIFE FEDERATION

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

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(225) 344-6707  
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March 17, 2023

Coastal Protection & Restoration Authority  
150 Terrace Avenue  
Baton Rouge LA 70802  
via: [masterplan@la.gov](mailto:masterplan@la.gov)

### **RE: Draft 2023 Louisiana's Master Plan for a Sustainable Coast (Coastal Master Plan)**

Dear CPRA,

Louisiana Wildlife Federation (LWF) has long championed the continued refinement and improvements to the state's coastal efforts through the Coastal Master Plan. LWF commends CPRA for their commitment to making every iteration of this plan more thorough and effective by building on successes of past plans and using stakeholder engagement to improve future processes, transparency, and community outreach.

The following comments are offered in the spirit of expanding those efforts to increase stakeholder understanding and engagement with the 2023 Coastal Master Plan.

### **Outreach and Engagement: Community Conversations and Public Hearings**

Outreach and engagement efforts have greatly improved over the years, and this has been no exception for the draft 2023 Coastal Master Plan. LWF applauds CPRA's efforts to engage with community partners through the Community Conversation meetings held in nine communities across the coast. Having these more informal meetings that offer conversational engagement with residents in their local communities is a critical part of the outreach and engagement process and we strongly encourage CPRA to continue these dialogues in the future. A way to increase the impact of such dialogues would be to offer these opportunities earlier in the drafting process – rather than at the end of that process – to provide residents adequate time to familiarize themselves with the process prior the official draft release.

LWF was pleased to see maps with improved readability – both in the plan itself and printed and displayed during public meetings. The ariel view maps of each region were an especially helpful addition to visualize proposed projects on the landscape for each region of the coast. The decision to address issues on a more regional level is an improvement and we are glad to see that CPRA took this feedback from the 2017 Coastal Master Plan to improve the planning process by incorporating regional workgroups to help develop and refine project ideas.

Including the Master Plan Data Viewer at public hearings was a great addition. It would be worth speaking a little more on this at the end of the presentation for any attendees that might not have had the time to arrive earlier in the afternoon during the open house. There was a focus on the data viewer during the Community Conversations but not as much at the public hearings.

The presentations given during the public hearings were very informative. LWF would like to offer a few suggestions to make this information more digestible for a general audience. CPRA should be mindful of using jargon such as “1% Annual Exceedance Probability”; explaining that CPRA looked at storms with a 1% chance of happening in any given year (and stressing the fact that such storms can occur more often than once every 100 years) would be more easily understandable. It would also be helpful to provide examples of storms that fall under such a category. Real world examples help visualize the concept and should therefore be given both during public hearings and in the master plan document itself.

The master plan presentation includes a slide on risk reduced at year 50 compared to a future without action. It would be helpful to give more context as to what those metrics are. People that are not familiar with the plan may not remember what expected annual damage in dollars (EADD) and expected annual structural damage (EASD) means. While the information given in presentations is valuable, it can be a lot to digest at one time for someone not familiar with the process. When explaining the reductions in figures associated with each metric, it would help to state, as is stated in the plan, that EADD is “an annualized estimate of storm surge damage. EADD includes damage to structures, their contents, and other direct losses incurred during the recovery period after a storm event, such as lost wages, [and] costs associated with evacuation and temporary displacement...EASD is reported in ‘structure equivalents’ and represents an aggregate risk to structures, with damage to each structure expressed as a proportion of its replacement cost”. It would be worth reiterating that EASD is a new metric added to this master plan and explain how it makes project selection a more equitable process.

Having a virtual meeting option is important and we encourage CPRA to always include this as part of its outreach efforts. A standalone virtual meeting, conducted strictly for an online audience, should give an overview of the entire plan as well as some specifics on each region. This could be a slightly longer meeting than typical 30-minute max in-person presentations in order to serve as a useful resource during the open comment period. In-person meetings could take a deeper dive into the benefits to the areas in which the meeting is held; these meetings could also be live-streamed. While live-streaming in-person meetings can be helpful for those unable to attend in their region on the meeting date, these should be offered in addition to (not in the place of) an online-only version of the presentation.

The Houma meeting is the only version of the master plan presentation available online. There is a lag in viewing the land change maps at different decades compared to the audio. This could perhaps be fixed by the presenter taking a few more seconds between maps before proceeding to the next decade in order for the viewer to adequately follow along. This also highlights the importance of having a meeting for an online-only audience.

Since this master plan process has included regional workgroups, it would make sense to have a public hearing for each region. CPRA does a good job of covering most of the coast, however, the following proposed locations would include Abbeville and a location in the River Parishes:

- Chenier Plain: Lake Charles
- Central Coast: Abbeville and Morgan City (the Morgan City hearing could combine an overview of the Master Plan with the Atchafalaya Basin Annual Plan hearing)

- Terrebonne Basin: Houma
- Barataria and Pontchartrain/Breton Basins: River Parishes and New Orleans

When meetings start at 5:30 pm, it is difficult for residents to travel over an hour and make it in time. If someone were to work until 5pm, for instance, they would miss the meeting entirely as presentations rarely last more than 30 minutes. This is why we would suggest adding Abbeville in addition to Lake Charles for public hearings and having a meeting in the River Parishes rather than (or in addition to) Baton Rouge, as Baton Rouge is notorious for poor traffic flow during this time and could make it equally difficult to get to for those that live or work in the River Parishes to make it to a meeting on time.

It is also important to consider the fact that not everyone has reliable broadband internet access. There needs to be more efforts in the future to communicate with communities in addition to digital communications via social media and email. Other methods to reach out to communities could be more direct by posting flyers about upcoming meetings (Community Conversations, calls for project ideas, official public hearings, etc.) in parish government offices, community centers, recreation centers, etc. CPRA could collaborate with local officials to determine other ways to expand communication efforts to ensure residents have the opportunity to engage.

Additional ways to increase accessibility include offering materials in multiple languages. This has been done before and would be helpful to offer for both the draft and final versions of the plan in order for non-English-speaking stakeholders to engage more fully in the process. Also, the 2017 Coastal Master Plan was made available in public libraries. LWF strongly encourages this for the 2023 plan and to make this a standard practice for all future iterations as well. In the printed version of the plan, there could be some improvements to the maps that are laid out over two pages. The portion of the map that falls in the spine of the book cannot be seen without damaging the binding. It might be helpful for final versions to include a wider page that is folded and can be opened to see the entire map rather than the map printed on two adjacent pages. This way, if schools or public libraries have printed copies (or anyone else for that matter), they can see that section of the coast and what is depicted on the maps. Another alternative would be to have printed versions spiral bound like the FY24 Annual Plan or rotate the maps so that they are in landscape view along the shorter edge of the paper.

Once a final version of the master plan is released, there should be a way to request a hard copy, and this should be clearly stated in the final plan as well as on the master plan website. Draft versions of the plan are made available in print during public hearings. Often, this is the only version people have even after edits are made for a final plan, leaving them with an outdated hard copy. Offering the opportunity to request a final copy could help ensure that stakeholders who regularly reference the document can have a current version on hand.

## **Master Plan Website**

On the main master plan page, there is a Technical Appendices link. For the layperson, however, this may seem like something to pass over, as one might assume that it may only contain information that gets “in the weeds”, such as specifics on model improvements. It would be

helpful to call out a little detail on what resources are offered under the Technical Appendices as there is a lot of valuable information that is not overly technical. For instance, the project, parish, and regional fact sheets are located here; it would be helpful for those links to be in a more prominent location (or added to the main master plan webpage as well); at the very least, it should be called out that the Technical Appendices link is where to find that information. Perhaps a section entitled “Additional Resources” could offer a bulleted list of links appendices, fact sheets, and other more useful supplemental materials for the general public to reference.

The fact sheets are not only difficult to locate if you do not know where to look but are also very cumbersome to navigate once the file is opened. The Project Fact Sheets (Attachment F2) document is 94 pages while the Parish Fact Sheets (Attachment F3) document spans 43 pages. While the parish and regional sheets include a table of contents with corresponding page numbers, this is missing from the Project Fact Sheets document. Also, while it makes sense to have these each as single attachments to include for purposes of the plan as a whole, this is not a user-friendly format as a general reference for stakeholders. It would be much more helpful to include these fact sheets as standalone files that can be downloaded or printed.

The draft plan included FAQs at the end of each section, which were a great addition. It would also be helpful for the questions to be compiled into a single FAQ document to be added to the master plan website. This could also be located under an “Additional Resources” section.

The Master Plan Data Viewer is an incredibly useful tool and LWF is pleased to see continued improvements and additions to this resource. We suggest that CPRA double-check the search feature to make sure it is working properly; last we checked, it was not responsive to search inquiries. It would also be helpful under the Projects tab of the viewer to organize the list by each of the categories. The list is organized alphabetically by project name, however, it would be useful to also reorder the list according to project type or parish, for instance.

Regarding the interactive project map, there is an issue with using this map on a mobile device. When zooming into the map to try to select a project, the icons do not auto-adjust in size as they do on the desktop version. This makes it difficult to select certain projects since the icons are stacked one atop another in the zoomed out view. Similarly, the text stays zoomed in a very large font when you zoom in and click on a project. Also, if someone rotates their phone to view the map in a landscape mode, they are unable to view the map of projects as it does not auto-adjust. We advise someone to review the mobile accessibility of this interactive map to fix these issues; this seems to be an issue for android users but not iPhone users.

## **Visuals in the draft 2023 Coastal Master Plan**

The project type icons and maps have significantly improved, and we commend this attention to detail to make the plan easier to read. Additionally, the explanations with the schematic crosscut with project features for each project type are incredibly useful visualizations and we commend CPRA for this improvement as well.



The Timeline of Progress is also a great overview of notable events and milestones achieved since 2005. It would be great if this could be an interactive online resource as well that is continually updated as time goes on and more work is completed, and key achievements realized. Examples of how this could be made interactive include linking a CPRA press release for each milestone/notable event as a way to offer more background and detail. Additionally, the user could hover over or click the numbers listed in the line graphs of “Projects Beginning Construction” and “Projects Completed” to get a brief overview to a list of projects. Another feature could give more detail when hovering/clicking the “Planned Annual Expenditure” totals; this could send the user to a list of expenditures by project, parish, region, and project type. It would also be helpful for these totals to depict “actual” expenditures rather than “planned” since totals for past years are known.

Maps are powerful tools for stakeholders to envision and communicate consequences of various scenarios on specific areas of interest. To help compare and contrast maps of a Future Without Action (FWOA) vs. Future With Action (FWA) as well as comparing sea level rise scenarios, it would be helpful, in addition to the current layout of the maps, to offer pages with an “At-a-Glance” view where the visuals are stacked one above another for the following:

1. Land Change: FWOA, lower vs. higher scenario
2. Land Change: FWA, lower vs. higher scenario
3. Land Change: FWOA, lower scenario vs. FWA, lower scenario
4. Flood Depths: FWOA, lower vs. higher scenario
5. Flood Depths: FWA, lower vs. higher scenario
6. Flood Depths: FWOA, lower scenario vs. FWA, lower scenario

Since the only conditions used throughout the plan for maps and other comparisons are the FWOA and FWA, LWF suggests removing the section that discusses future without currently funding projects (FWOCFP). This causes some confusion with a future without action. Perhaps this would be better suited as a call out box in the FWOA section that states that other model runs considered only projects that have been constructed with a note of the appendix where more information can be found. This section could cause more confusion than understanding.

The benefits over time includes several graphs that show impacts of the plan. The graph depicting land area built or maintained (Figure 5.4) could use a bit more description to clarify the results. One might assume that benefits of implementing the projects in the plan would be more pronounced under the lower scenario; however, the graph indicates this is not the case. More detail explaining these results could reduce confusion.

## **Projects and Programs**

LWF is pleased to see major projects moving to the FWOA condition – particularly the River Reintroduction into Maurepas Swamp and the Mid-Barataria and Mid-Breton Sediment Diversions. LWF eagerly awaits ground-breaking for these restoration projects.

Regarding diversions, there needs to be more details given about diversions being considered programmatically rather than specific proposed projects. The Upper Basin Diversions Program is given some explanation in the plan but could use a bit more detail. For example, are there projects that are completely removed? What about the Union Diversion, which has funds allocated in the annual plan? Explanation on specific projects that have previously been in the plan (like Union and Ama and Central Wetlands) need to be discussed here.

To further explain changes from one plan to another, LWF strongly recommends CPRA offer an online resource that clearly lists: (1) projects in the 2023 Coastal Master Plan that were carried over from the 2017 plan; (2) projects that were removed from the plan with an explanation of why; and (3) projects that are new additions to the plan.

### **Additional Comments on the draft 2023 Coastal Master Plan**

Prior to Chapter 1, there should be an Executive Summary. This should also be a stand-alone document on the master plan website that can be shared broadly to educate residents and other stakeholders that are not familiar with the plan. Summaries are helpful for people that may be new to learning about the plan and for people that may not have time to read the plan in its entirety.

Prior to the summary should be a List of Abbreviations; while many of the appendices include one, this is missing from the main document. The table of contents should be more comprehensive and list section titles in each chapter to more quickly find information.

LWF commends CPRA on improving modeling parameters to include not just the value of individual structures, but the number of structures impacted in a given area as well. The Expected Annual Structural Damage (EASD) metric is a great improvement. In Chapter 2, this metric is explained in a bit more detail. A very important point is made: “It is important to consider the proportional flood damages that are represented by EASD so that the project selection process will not be more heavily weighted toward reducing damages in affluent communities at the expense of communities with lower property values.” This is a point that should be highlighted in the introduction as well as an executive summary as it is a very critical point to note how this plan is made more equitable than past plans.

Included in 2017 Coastal Master Plan was an infographic depicting the economic importance of Louisiana’s coast. The Master Plan Data Viewer in that section was helpful as well to bring that to people’s attention. These should be updated and added to an Executive Summary section in the 2023 Coastal Master Plan as well.

The call out boxes that lists relevant appendices are very helpful. However, since the appendices are not at the end of the master plan document itself but are instead in a different location on the website, it would be even more helpful to note the website URL and include a QR code that links to that section of the 2023 Plan Appendices website (just as is done on each map that links to the main master plan website). Additionally, the 2017 Coastal Master Plan mentioned appendices on

the “Contents” page; this should also be added to the 2023 Coastal Master Plan “Contents” page and include the URL.

It would also be helpful in The Current Outlook section of Chapter 3 (pgs.36-39), to add a similar call out box to Appendix F – particularly the 2023 FWOA Project List (Supplemental Material F1.1). In this part of Chapter 3, future without action is explained in further detail, so it would be helpful to note where to find the list of projects included in the FWOA condition.

The Funding and Implementation section should be separated as standalone sections. It might be more appropriate to include the section on funding in chapter 1 or 2 with other background information. A section on implementation could also give general details on implementation periods. Furthermore, there should be explanation on the implementation years given in the Master Plan Data Viewer as to how these years were determined. It should also provide more information on how CPRA plans to utilize the \$11.2 billion set aside for nonstructural measures. There isn’t much explanation as to how these funds are planned to be spent or what entity will oversee this. Clearly, there are unknowns as far as what exact properties would get money, but there needs to be more description as to the programmatic plans. As the years progress, the impacts of sea level rise compounded with subsidence will make nonstructural protection increasingly important for communities to understand so that they weigh their options to protect themselves from future risks.

Funding coastal restoration and protection projects can be very complex to understand. While CPRA has done a good job of including information on the various funding sources and entities, it would help if the information were laid out in different segments. It might be more easily digestible to break it up into major sources of funding such as oil spill settlement funds (RESTORE, NFWF, NRDA), state and local funds (Coastal Trust Fund, capital outlay), federal sources (CWPPRA, GOMESA, WRDA), as well as other funding priorities and sources (IIJA, Supplemental Disaster Relief), etc. An additional segment to the funding section of the plan should highlight the fact that the master plan currently does not have enough funding identified to implement all projects. It would be worth noting efforts underway to secure funding to fill that gap.

Regarding engagement with the master plan process, it would be helpful to list in the plan additional background information on how advisory and workgroup members are selected and, if applicable, how others can get in contact with CPRA if they are interested in learning more and/or being involved in future advisory roles. It would be helpful for CPRA to also include some guidance on how to suggest a project idea for the next master plan. Some of this can just be referenced toward the end of the document with a link to the website where they can learn more.

The Beyond the Master Plan section is a nice way to conclude the plan to describe additional work being done to address Louisiana’s coastal challenges. Website addresses should be listed for each program that is mentioned in this section. Other additions consider include:

- The Louisiana Hypoxia Working Group and the Gulf of Mexico Hypoxia Action Plan
- The National Estuarine Research Reserve program and the nomination of the Atchafalaya Basin to serve as Louisiana’s first NERR

- The Water Institute of the Gulf
- The LSU Center for River Studies

As was mentioned during the public hearings, what's at stake are Louisiana homes, jobs, and culture. It was stated that "the goal is to have a resilient coast in which people can continue to live and work and take advantage of all the things that make the coast of Louisiana so economically and ecologically and culturally valuable". This planning process has made great improvements to more fully consider human impacts when considering projects. In 2017, CPRA released a document, *People and the Landscape* (Appendix B), that reviewed the plan as it relates to Louisiana's coastal residents. It included discussions on land loss, insurance, population shifts, and flood risk as well as economic opportunities and the importance of our coast to the nation. It would be very helpful for CPRA to continue offering this non-technical summary of master plan themes and findings that can be shared with residents, parish leaders, and other stakeholders. We suggest including additional explanation of adaption and nonstructural protection in this document in addition to the previously mentioned topics and include more information on the Master Plan Data Viewer. Including visuals like the community cross section with high tide flooding elevations would be a good addition to this document as well. As years progress and funding from the *Deepwater Horizon* settlement wind down, having a resource like this would be valuable to highlight the importance of securing additional funding for coastal restoration and protection projects.

LWF is pleased to see a continued commitment by CPRA to develop a comprehensive plan that takes all the stakeholders into account. We offer these additional suggestions for further clarity and accessibility of information and look forward to seeing this progress continue.

Louisiana Wildlife Federation is a statewide, nonprofit organization that represents 19 affiliate organizations and more than 8,000 members dedicated to the conservation of Louisiana's wildlife and natural resources. Thank you for the opportunity to submit these comments for consideration.

Sincerely,



Stacy Ortego  
Coastal Policy Manager

## CPRA Master Plan

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**From:** Tyler Bosworth  
**Sent:** Saturday, March 25, 2023 11:55 AM CPRA  
**To:** Master Plan  
**Cc:** Kimberly Reyher; James Karst  
**Subject:** CRCL CMP Public Comments  
**Attachments:** CRCL CMP Public Comments Signed.pdf

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**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

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To whom it may concern:

Thank you for this opportunity to comment on the 2023 Coastal Master Plan for a Sustainable Coast. We appreciate your continued efforts.

Respectfully,

Tyler M. Bosworth, J.D.  
*Advocacy Director*  
*Coalition to Restore Coastal Louisiana*  
*3801 Canal Street, Suite 400*  
*New Orleans, LA 70119*  
Phone: (225) 281-8441



[Support CRCL](#) and together we can build a stronger coast!



March 24, 2023

Coastal Protection and Restoration Authority  
Master Plan Public Comments  
150 Terrace Avenue  
Baton Rouge, LA 70802  
[masterplan@la.gov](mailto:masterplan@la.gov)

**Re: Comments on Louisiana's Comprehensive Master Plan for a Sustainable Coast, 4<sup>th</sup> Edition**

Dear Chairman Kline and Executive Director Haase:

We are writing on behalf of the Coalition to Restore Coastal Louisiana (CRCL), the first statewide nonprofit organization dedicated to confronting coastal land loss in Louisiana. CRCL is the most widely recognized and effective coastal advocacy entity in the state. We represent a unique mix of businesses, local governments, industries, scientific communities, national and local conservation groups, hunters, anglers, and a broad spectrum of concerned residents. Our mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. As an organization with longstanding interest in coastal projects, we appreciate this opportunity to provide input on the most recent iteration of Louisiana's Comprehensive Master Plan for a Sustainable Coast (Coastal Master Plan or CMP).

We write today to once again express our support of the Coastal Master Plan, a superlative document based on world-class science that has guided efforts to understand and address coastal land loss. We applaud the inclusive process that the Coastal Protection and Restoration Authority (CPRA) has developed to engage communities, industry groups and scientists in the CMP's iterative updates.

As Louisiana faces more frequent severe weather events, rising sea levels and increasingly challenging decision points regarding the natural and built environment, the CMP presents a unified vision with bipartisan support, with coastal communities, business interests, environmental advocates and all levels of government coming together to inform the solutions identified in this draft plan. The CMP remains a remarkable achievement, establishing a programmatic response based on the latest science to address clear and present challenges and opportunities for our state. The projects and programs identified are on the cutting edge of climate change adaptation and damage mitigation, seeking a more resilient, sustainable, and ecologically healthy future while leading the rest of the nation by example.

For decades, the people of Louisiana have recognized the land-loss challenges we face as a state and have rallied behind the government with broad support for plans to tackle the problem. Year after year, we see that support grow. Where people used to be wary of large-scale river diversions, poll after poll shows that support for such projects has steadily climbed. Where folks used to fear the impacts of coastal projects on fisheries, they now understand the importance of these projects and seek to find ways of adapting to maintain economic and cultural ties to the coastal landscape. Where people used to shun alternative sources of energy in this state, they now broadly support federal legislation such as the RISEE and BRES Acts, which seek to give Louisiana a fair share of monies derived from such energy sources. Where people in this state used to deny the causal relationship between greenhouse gases and climate change, CPRA and the governor put

3801 Canal Street, Suite 400  
New Orleans, LA 70119  
[CRCL.org](http://CRCL.org)

forward a plan to identify opportunities across the state to prepare for climate change impacts and meaningfully reduce carbon emissions. That, too, has come with a sea change in public opinion. None of this would have happened without the planning and foresight of the coastal program.

Despite all of these successes, Louisiana's coastal program still faces challenges. The causes of climate change have not vanished. Carbon emissions have not been significantly curbed on a global scale. Sea level rise is projected to continue. Detractors and deniers still seek to sow doubt about the effectiveness of the plan's projects; administrations change, as do their priorities; and long-term funding is not guaranteed. We need to ensure that we maintain the momentum of this administration by ensuring that the next one builds on the progress that has been made and that the plan will continue to be implemented and advanced. We also need to maintain the level of outreach and education to continue to have an informed and engaged public. All of this depends on securing long-term, sustainable funding for the coastal program.

While CRCL fully supports the 2023 CMP, we would also like to see more emphasis placed on funding small-scale, distributed restoration projects and support for allowing natural crevasses on the east bank of the Mississippi River such as Neptune Pass to flow and continue to build land, as well as accounting for those effects in the plan. These are truly cost-saving techniques that provide lasting benefits.

We would also like to see more support for small-scale distributed and innovative restoration projects. While large-scale projects are vitally important for restoring coastal landscapes at scale, small-scale projects are important for engaging with local communities through volunteerism and addressing granular community needs and opportunities. Additionally, these small projects are nimble enough to pilot innovative practices such as using recycled oyster shells for living shorelines to protect vulnerable Indigenous cultural sites. CRCL's restoration programs have long proved that through a large, diverse volunteer base, small projects can have a significant impact on the landscape directly and on the community indirectly through increasing public engagement and building support for the coastal program. We are grateful for CPRA's support to engage with volunteers to plant 14,500 trees in the Central Wetlands Unit through 2026. We would like to see more opportunities for these types of projects in the future.

Nothing, however, is more cost-effective than letting the river flow where it naturally wants to flow. There is a place in coastal Louisiana where this exact thing is happening. South of Port Sulphur, on the east bank of the Mississippi River, there is a stretch of river that is no longer maintained by the Army Corps of Engineers. On that stretch of the Mississippi, the river pours into the marsh through a series of natural crevasses and builds land as a result. The amount of land being created by natural processes would cost the state and federal government hundreds of millions of dollars to build, but the price per acre of new land there is virtually free. We need to fight to maintain this tool in our coastal toolchest. Considering the issue we face with future funding of the program, we need to fight for the continued benefits that these natural features provide us with, because they are the most cost-effective technique we have. CRCL urges CPRA to continue to work with the Corps on any potential dredging issues that could be identified as a hazard to navigation so that they can be addressed in a way that allows the river to flow out into the marsh as freely as possible.

In closing, the 2023 Coastal Master Plan is the most comprehensive iteration of the plan we have seen. We commend CPRA and its team for their years of work to produce such a rigorous scientific plan in the name of protecting the people of this great state. Although the challenges we face are some of the most complex and expensive in the world, we have faith in the proven record of CPRA and the plans that they continue to implement.

Sincerely,

Tyler M. Bosworth

A handwritten signature in black ink, appearing to read "Tyler B.", with a stylized, cursive script.

Advocacy Director  
Coalition to Restore Coastal Louisiana



## CPRA Master Plan

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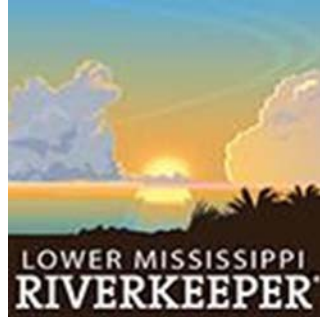
**From:** Doug Daigle  
**Sent:** Saturday, March 25, 2023 12:39 PM  
**To:** CPRA Master Plan  
**Subject:** LEAN-LMRK Comments - 2023 Draft CMP  
**Attachments:** LEAN-LMRK PUBLIC COMMENT ON 2023 DRAFT CMP.docx

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

March 25, 2023

The Louisiana Environmental Action Network (LEAN) and Lower Mississippi Riverkeeper (LMRK) submit the following comments on the 2023 Draft Louisiana Coastal Master Plan (CMP).

Sincerely,  
Marylee Orr  
Director  
LEAN/LMRK  
P.O. Box 66323  
Baton Rouge, LA 70896  
225-928-1315 (office)



March 25, 2023

Louisiana CPRA  
Master Plan Public Comments  
150 Terrace Avenue  
Baton Rouge LA 70802

To Whom It May Concern,

The Louisiana Environmental Action Network (LEAN) and Lower Mississippi Riverkeeper (LMRK) welcome the opportunity to submit comments on the 2023 Draft Louisiana Coastal Master Plan (CMP). Many changes have been underway, and some of the same issues remain, since we submitted comments on the 2017 Draft Plan.

One of the major areas of change has been the development of a State Climate Policy, with the convening by Governor Edwards of the Louisiana Climate Initiatives Task Force, and their concurrence on a Louisiana Climate Action Plan. LEAN was proud to serve on the Task Force since the climate issue has been a major area of focus for our organization for over 25 years.

LEAN and LMRK work to track and assess both air and water permits in Louisiana. The permit process is a key point of intersection with state policy and the climate issue, in particular for the prospects of reaching the Initiative's near-term goal of a 26-28% reduction of net greenhouse gas (GHG) emissions from 2005 levels by 2025. A continual stream of large GHG emitting facilities is being permitted (new and renewed) in the State, including new Liquid Natural Gas (LNG) facilities, in addition to the large sources identified in the 2021 Louisiana Greenhouse Gas Inventory.

Those facilities located in the State's coastal zone are required to obtain a Coastal Use Permit (CUP), which generally focuses on wetland and water impacts, while the GHG emissions from all facilities in the state contribute to the global trends of sea-level rise, extreme weather events, etc. Those trends are in turn contributing to increased risk both in the coastal zone and across the state, and are colliding with infrastructure decisions such as development of high-risk flood zones.

The Louisiana Watershed Initiative (WSI), also highlighted in the Draft 2023 CMP, was created in response to the 2016 flood event, and provides an important policy tool for controlling development of flood zones that is increasing damage and risk for residents of the coastal zone and watersheds across the state. There are additional policy tools and resources that can be applied for cooperative agreements and incentives in combination with the WSI, such as the Louisiana Outdoors Forever Program.

Another intersection of the permit process with coastal issues is the area of water pollution, where the Department of Environmental Quality administers the Louisiana Pollutant Discharge Elimination System (LPDES) of permits. The Mississippi River is a major recipient of industrial and municipal discharge, the impacts of which are somewhat offset in the river channel by its large flow volume, but pollution loads can have impacts further downstream in the Gulf of Mexico, where point and non-point source nutrient loading fuels the annual Hypoxic Zone of low-oxygen, which forms for longer duration in some years now.

The Environmental Integrity Project (EIP) an assessment in January of this year showing that Louisiana hosts eight of the refineries with the highest toxic pollutant and wastewater discharges in the U.S., several of which are sited on the Mississippi River. A related long-standing issue of concern which LEAN has raised in the past is the number of abandoned waste sites and wells in the coastal zone which are at heightened risk for inundation from hurricanes and sea level rise.

Our work with vulnerable communities impacted by air, land, and water pollution, extreme weather and flooding, and other risk factors, has shown us how residents are being currently affected by these trends. Our main suggestion for the 2023 Draft CMP. therefore, would be to expand the coordination and integration of the coastal restoration program with the Louisiana Climate Plan and Watershed Initiative, and especially with air and water permit decisions so that administrative and policy decisions are not taking place in separate silos. Such integration would contribute significantly to the sustainability of the coast and the State as a whole.

Sincerely,

Marylee Orr, Director  
Louisiana Environmental Action Network/Lower Mississippi Riverkeeper  
P.O. Box 66323  
Baton Rouge, LA 70896

*The Louisiana Environmental Action Network works to foster cooperation and communication between individual citizens and corporate and government organizations to assess and address environmental problems in Louisiana. The Lower Mississippi Riverkeeper's mission is to protect, preserve and restore the ecological integrity of the Mississippi River Basin for current and future generations through advocacy and citizen action.*

## CPRA Master Plan

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**From:** Peter Waggonner  
**Sent:** Saturday, March 25, 2023 12:53 PM  
**To:** CPRA Master Plan  
**Cc:** Joni.Tuck@shell.com; Jasmine Brown  
**Subject:** Public Comment from CCRE  
**Attachments:** CCRE 2023 Draft Master Plan Public Comment.pdf

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**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

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Dear CPRA Staff,

Attached, please see public comment submission from the Coalition for Coastal Resilience and Economy (CCRE). Thank you for the opportunity to support the draft, and thank you for your review and inclusion of this comment in the Master Plan's final draft.

Best,  
Peter

**Peter Waggonner**  
Public Policy Manager



**Greater New Orleans, Inc.**  
1100 Poydras Street, Suite 3475  
New Orleans, LA 70163  
[www.gnoinc.org](http://www.gnoinc.org)

504.527.6980



March 25, 2023

*Submitted via email to: [masterplan@la.gov](mailto:masterplan@la.gov)*

RE: Support for the 2023 Draft Coastal Master Plan

Dear Coastal Restoration and Protection Authority (CPRA) Staff,

On behalf of the Coalition for Coastal Resilience and Economy (CCRE), we write in support of the 2023 Draft Coastal Master Plan ("Draft Master Plan"). Comprised of members of the Greater New Orleans business community and regional institutions, CCRE champions the business case for coastal restoration in Louisiana. We believe that economic development and coastal resilience are mutually dependent, and thus, we believe that the implementation of the 2023 Coastal Master Plan is crucial to Louisiana's economic wellbeing – along the coast and well beyond.

The 2023 Draft Master Plan underscores the economic importance, on a national level, of coastal Louisiana. The Master Plan states that, "With a population of more than two million people, coastal Louisiana is home to a rich diversity of people, communities, and cultural traditions. It is also home to a variety of industries, ecosystems, and natural resources which feed and nourish its people and the nation's economy." Energy, chemicals, ports, ship building, agriculture, seafood are among industries identified.

Meanwhile, the Draft Master Plan expresses Louisiana's economic challenges. The "Understand" chapter affirms that, "Many of these coastal industries and businesses rely on workers living in coastal communities that have become increasingly impacted by damage from hurricanes in recent decades. Repeated flooding, frequent and unpredictable evacuations, and challenges with obtaining affordable insurance are all factors that have contributed to many residents' decisions to move inland."

Furthermore, the Draft Master Plan acknowledges the economic value of the Master Plan itself: "The plan provides tremendous economic development opportunities for Louisiana and its citizens. Our investment in coastal research has spurred the growth of this and related fields." To maximize this overarching opportunity, CCRE advocates for opportunities to engage local business and workforce in the Coastal Master Plan's \$50 billion implementation. CCRE supports building equity by encouraging inclusive business participation in coastal contracting and encourages CPRA and its partners to work with diverse suppliers to assist them in identifying and overcoming barriers of entry to performing these vital works. We believe this can be accomplished by CPRA and partners during the 50-year implementation period through activities spanning business development, transparency, accountability, policy, and exposure.

CCRE supports all project types, including diversions. We recognize the Mid-Barataria Sediment Diversion, as included in the "Future Without Action" (FWOA) scenario. The science tells us that reconnecting the Mississippi River to basins, and to swamps like Maurepas, will provide "a source of sediment to nourish and maintain existing wetlands and to create coastal wetlands over time, in much the same way as southeast Louisiana was originally built by the Mississippi River before levee construction." According to the Draft Master Plan, the Mid-Barataria Sediment Diversion has the potential to build and maintain 21 square miles of new land over a 50-year period. CCRE uplifts both these diversions and the suite of diverse complementary projects across the Barataria and Pontchartrain/Breton regions, which can create additional layers of protection to critical infrastructure, key economic engines, and fellow coastal projects.



We recognize that striking a balance between restoration and protection is not easy, and we support CPRA's approach in building a balanced portfolio of projects which will provide real risk reduction to people, communities and critical infrastructure while largely maintaining or enhancing habitat values in the Barataria and Breton basins.

In total, under the lower environmental scenario, the projects in the Draft Master Plan will create and maintain approximately 314 square miles of land over 50 years. CCRE encourages the pursuit and realization of further coastal funding sources, such as carbon markets and enhanced federal energy revenue-sharing, to allow for maximal project implementation, above the FWOA scenario.

Finally, CCRE recognizes that the Draft Master Plan's section on the "Climate Initiatives Task Force," including the Climate Initiatives Task Force's recommendation regarding an "inclusive, low-carbon economy" and priority regarding "low and no-carbon hydrogen." Greater New Orleans, Inc. (GNO, Inc.) is currently implementing the H<sub>2</sub>theFuture project, with 25 partners across South Louisiana, to grow the regional hydrogen energy sector while reducing regional emissions. CCRE, founded by GNO, Inc., highlights the importance of hydrogen to economic development in Louisiana and its relevance to coastal restoration and protection. Further, GNO Inc. has established the GNO Wind Alliance with partners across Louisiana's Working Coast to assist our mature offshore energy development and supply chain industry in preparing to service the renewable offshore wind market as it comes online in the Gulf of Mexico.

In conclusion, CCRE supports the Draft Master Plan, its contents, and its expedient implementation. We appreciate CPRA's work in preparing this draft and finalizing the 2023 Coastal Master Plan, in consideration of its critical economic impact.

Sincerely,

Joni Tuck

CCRE Chair

Corporate Relations Advisor - Deepwater Gulf of Mexico, Shell

## CPRA Master Plan

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**From:** john kinabrew  
**Sent:** Saturday, March 25, 2023 4:02 PM  
**To:** CPRA Master Plan  
**Subject:** 2023 Coastal Master Plan

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

I support the Master Plan process because it is publicly informed, grounded in the best available science, balances coastal restoration with protection, and is realistic about the challenges we face.

This Master Plan continues to build off of previous plans using regional work groups formed to get region-specific expertise and feedback.

The plan importantly includes expected annual damage in dollars metric, to evaluate the future with or without the Master Plan to capture the economic impact of damages from storms, including damages to structures, their contents, lost wages, cost of evacuation and temporary displacement.

While the state has made significant progress in implementing restoration projects across our coast, we must continue to move forward on building and sustaining the Mississippi River Delta and our entire coast to ensure a better future for Louisiana.

**A key component of securing that sustainable future is continuing to use the land building power of the land building power of the Mississippi River to the greatest extent possible.**

It is sensible to focus on large-scale restoration projects first, because they have a greater impact over time and support investments made in other restoration and risk-reduction projects.

Most importantly I support this 2023 Coastal Master Plan because it is a huge, urgently needed, step towards protecting, sustaining, and improving this very special place we all call home and love so much.

John Kinabrew  
Past Board Chair  
Pontchartrain Conservancy

## CPRA Master Plan

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**From:** Simi Kang  
**Sent:** Saturday, March 25, 2023 5:53 PM  
**To:** CPRA Master Plan  
**Cc:** Sandy Nguyen  
**Subject:** 2023 Draft CMP Public Comment - Coastal Communities Consulting, Inc.  
**Attachments:** CCC-MP23-Comment.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

To Whom It May Concern,

I write to you on behalf of the staff of Coastal Communities Consulting, Inc. (CCC) to submit CCC's public comments regarding the 2023 Draft Coastal Master Plan. Please find a PDF version of said comments enclosed.

Please feel free to contact myself or CCC's Executive Director, Sandy Ha Nguyen, cc'd here, with any questions or follow-up.

Thank you,  
Simi Kang

--

Simi Kang, Ph.D. (she/they)  
Assistant Professor  
Department of Gender Studies  
University of Victoria, BC

Coastal Project Coordinator  
Coastal Communities Consulting, Inc.  
Gretna, LA - <http://ccc-nola.org/>





Coastal Protection and Restoration Authority  
P.O. Box 44027  
Baton Rouge, LA 70804-4027

March 25, 2023

To Whom It May Concern,

We write as the staff of Coastal Communities Consulting, Inc. (CCC), a 501(c)3 organization headquartered in Gretna that supports the economic and environmental stability of coast-dependent small businesses in Southeast Louisiana. We work with Southeast Asian American, Central American, Black, Cajun, and Croatian fishers and their families whose homes and businesses are overwhelmingly located in low-income areas. As residents who experience the acute effects of a changing coastal ecosystem, fishers and their neighbors are critical stakeholders in the outcome of every project the Coastal Protection and Restoration Authority implements. Considering this, we believe it is imperative that we share our feedback regarding the Draft 2023 Master Plan for a Sustainable Coast (henceforth, Draft CMP).

One of the most important pieces of any public-facing project is its approach to including the public for which it is designed. CPRA did an excellent job of enumerating the community meetings it held in the months leading up to the Draft CMP's release. While we appreciate this kind of outreach, CCC and our partners have consistently asked that coast-dependent, ecologically and environmentally vulnerable, low-income, and racialized communities be consulted *throughout* the plan's conception, rather than at its very end. In spite of the fact that the Draft CMP states that "Throughout plan development, CPRA staff had conversations with a variety of groups and individuals, including fishers, students, landowners, business and industry representatives, non-governmental organizations, parish officials, elected leaders, and tribal leaders"<sup>1</sup>, resident stakeholders feel that they have not been incorporated into this work in any meaningful way until the public comment session, after which only minor revisions are made to a given plan.

As an all women of color-run organization that overwhelmingly serves communities who are vulnerable to racial, ethnic, economic, and ecological violence, we ask that CPRA think critically about its commitments to environmental justice in all of its processes. As the U.S. Environmental Protection Agency makes clear, residents who experience environmental injustice should not just be considered, but "meaningfully involved" in "the development, implementation, and enforcement of environmental laws, regulations, and policies"<sup>2</sup> that impact them. Given that the Draft CMP is a document designed to "bridg[e] the gap between the current conditions in coastal Louisiana and future changes, while providing a path forward to support the lives, livelihoods, and culture of our coastal citizens and communities,"<sup>3</sup> we believe that CPRA should develop clear protocols and processes around resident stakeholder collaboration, expertise, and support as a part

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<sup>1</sup> Coastal Protection and Restoration Authority, "2023 Louisiana's Comprehensive Master Plan for a Sustainable Coast," 26.

<sup>2</sup> US EPA, "Environmental Justice."

<sup>3</sup> Coastal Protection and Restoration Authority, "2023 Louisiana's Comprehensive Master Plan for a Sustainable Coast," 4.

of the Final CMP. This includes all coast-dependent and inland communities whose lives and livelihoods are dependent on the ecosystems CPRA is working to restore, particularly those whose vulnerabilities to coastal change are exacerbated by their race, ethnicity, income levels, and/or ongoing exposure to environmental harms.

While the Draft CMP references the region's diverse people and rich cultures who "make their living on the Louisiana coast - fishing, hunting, and working in industry"<sup>4</sup>, the crucial role that fisheries play in the region—and the effects of projects on its longevity—are overwhelmingly left out of the plan. Fisheries play a crucial role in the coast's environment, as well as the region's economic and cultural health. Critically, "In 2019, the seafood industry in Louisiana generated total revenues of approximately \$1.5 billion...[and] supports nearly 27,000 jobs in Louisiana. In addition, the total 'value added' of the seafood industry represented approximately 0.30 percent of Gross Domestic Product (GDP) in Louisiana"<sup>5</sup>. Leaving out an industry that has such an outsized impact on the economic, cultural, and ecological stability of many coast-dependent communities is a critical oversight because several of the projects included in this Draft CMP will have significant impacts on the ecosystems and species on which fisherfolk rely.

To this end, we are concerned that the entire Draft CMP is presented with the Mid-Barataria and Mid-Breton Sediment Diversions already operating on the landscape but without attendant documentation of the diversions' impacts to coast-dependent communities. It is our understanding that while construction on the Mid-Barataria diversion may begin as early as Fall 2023, it will be several years before the diversion is operating, and several more before it is joined by Mid-Breton. This is a critical time for the people of the Birdfoot Delta and Lower Plaquemines Parish, as well as coast-dependent residents of Orleans, Jefferson, Lafourche, and Terrebonne parishes; many of their livelihoods depend on Barataria Bay, LA 23, and the surrounding infrastructure, all of which will be impacted by years of construction prior to the diversion going live. This will have an outsized impact on CCC's clients and community partners.

Once the diversions are operating, "...the overall Project effect determination is a moderate to major permanent adverse impact to the commercial shrimp fishery."<sup>6</sup> Given this, the project has the potential "to result in disproportionate impacts to some low income and minority shrimp fishers"<sup>7</sup>. In light of these major permanent adverse impacts of the Mid-Barataria Bay sediment diversion, the U.S. Army Corps of Engineers suggested several mitigation measures to support residents and fisheries. Concurrently, CPRA identified their own stewardship measures, which they have asked fishers to reflect on and rank in ascending order of importance via a series of surveys distributed throughout 2022. None of these mitigation or stewardship measures were reflected in the Draft CMP, either in discussions about outreach and engagement or in relation to project implementation. The outcomes of the fisheries surveys were also not mentioned, nor were the funds that have been dedicated to carrying out stewardship measures.

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<sup>4</sup> Coastal Protection and Restoration Authority, "2023 Louisiana's Comprehensive Master Plan for a Sustainable Coast," 20.

<sup>5</sup> US Army Corps of Engineers and G.E.C., Inc., "Final Environmental Impact Statement for the Proposed Mid-Barataria Sediment Diversion," 3–212.

<sup>6</sup> Coastal Protection and Restoration Authority, 4–621.

<sup>7</sup> US Army Corps of Engineers and G.E.C., Inc., "Final Environmental Impact Statement for the Proposed Mid-Barataria Sediment Diversion," 4–621.

These omissions send a message to coast-dependent and fishing-dependent communities that they are not worth including in a comprehensive, coast-wide plan. This is particularly surprising considering the Draft CMP's statement that "The ecosystem benefits provided by the plan will support commercial and recreational fisheries and wildlife across the coast and provide additional benefits to our communities"<sup>8</sup>. These benefits, as well as project impacts, mitigation measures, and ongoing stewardship efforts, should all be clearly outlined in the Final CMP. Additionally, as the Mid-Breton Sound sediment diversion is under review by the Army Corps and has not been permitted, CPRA should clearly identify its likely impacts and mitigation measures in the Final. Finally, if CPRA is to mitigate the ongoing environmental injustices that so many coast-dependent residents experience every day, resident stakeholders must be engaged as collaborators over both diversions' environmental impact assessments, permitting, and construction processes.

The Draft CMP offers several improvements on the 2017 Master Plan, including a regional approach that allows stakeholders to understand how projects will impact their region and their livelihoods. We also noted that rather than relying exclusively on dollar amounts, metrics for non-structural funding focus on the number of homes impacted and acknowledges that many culturally important sites are at risk as our coast changes. However, it remains difficult for residents without internet access or computer skills to identify how they will be affected, given the emphasis on digital visualization tools, which do not incorporate generational, tribal, or other traditional forms of knowledge held by frontlines communities, who are the lived experts of Louisiana's vulnerable ecosystems. What's more, the circulation of the draft exclusively online and only in English precludes many of the communities who are most impacted by environmental change and master plan projects from accessing the information, meetings, and comment opportunities they need to be heard.

Prior to the release of the 2017 Master Plan, CCC urged CPRA and its collaborators to make its plans and meetings language accessible. To us, language access means that every resident impacted by master plan projects can clearly and robustly understand those projects' effects in plain, accessible, and culturally relevant language. Residents whose first languages are Vietnamese, Khmer, Spanish, Arabic, French, etc. should be able to understand projects as well as residents for whom English is their first language. This includes in the plan itself, as well as in the public-facing meetings CPRA undertakes, in opportunities for residents to give feedback and submit public comments, and for parallel processes, including project environmental impact assessments. If the purpose of the Draft CMP is to build the resilient coast, which is "dependent on the decisions of individual citizens, communities, local governments, and businesses, as well as fellow state and federal agencies,"<sup>9</sup> it must do the work of clearly "illustrat[ing] how people and communities may experience [coastal] change so they can make informed decisions." Central to this work is making sure every person in the state can read, hear, and understand the projects being forwarded in the plan. Over six years later, language access should be a priority for the agency, and should be a part of the Final CMP rollout and all future CPRA engagements with community.

Finally, we believe that the Coastal Master Plan process can and should exemplify community leadership in restoration decision-making. As a community-based organization that serves coast-

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<sup>8</sup> Coastal Protection and Restoration Authority, "2023 Louisiana's Comprehensive Master Plan for a Sustainable Coast," 15.

<sup>9</sup> Coastal Protection and Restoration Authority, 3.

dependent residents who have generations of place-based expertise, we urge CPRA to work more closely with resident stakeholders to co-develop adaptation and resilience metrics prior to creating draft plans. This will greatly benefit CPRA's capacity to "provid[e] a path forward to support the lives, livelihoods, and culture of our coastal citizens and communities."<sup>10</sup> We encourage you to use the Final CMP to clearly outline how this will be done equitably, justly, and consistently in future processes.

To reiterate, CCC would like to see the following in the Final 2023 CMP:

- plans to meaningfully seek out the expertise of coast-dependent, ecologically and environmentally vulnerable, low-income, and racialized communities *throughout* individual project design and CMP conception.
- clear protocols and processes around resident stakeholder collaboration and support that center federal principles of environmental justice.
- a commitment to incorporating the generational, tribal, or other traditional forms of knowledge held by frontlines communities in the CMP moving forward.
- a dedicated section to address the CMP's impacts to fisheries, including data solicited from fishing-dependent communities and commitments thereto.
- the inclusion of a dedicated section about the Mid-Barataria and Mid-Breton sediment diversions that addresses:
  - each diversion's impacts to fisheries and communities in the project areas
  - mitigation measures, and approaches to stewardship, including budget line items representing the same.
  - how CPRA plans to collaborate with fishers and other resident stakeholders over both diversions' environmental impact assessments, permitting, and construction processes.
- a commitment to language access, which includes document translation into primary languages as well as dedicated interpretation during outreach meetings and other efforts.
- clearly identified strategies to reach residents with limited access to Wi-Fi and with low computer technical acumen.

The next decade is a significant opportunity for Louisiana to establish itself at the vanguard of environmentally just, community-level environmental adaptation planning and restoration mitigation. CCC and the communities we serve look forward to being meaningfully engaged in the Final CMP and all mitigation, stewardship, outreach, and collaborative efforts that emerge from it moving forward.

Sincerely,



*Sandy Ha Nguyen*  
Coastal Communities Consulting, Inc.  
925 Behrman Hwy., Suite 15  
Gretna, LA 70056

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<sup>10</sup> Coastal Protection and Restoration Authority, 4.

## CPRA Master Plan

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**From:** Amy Stone  
**Sent:** Saturday, March 25, 2023 8:09 PM  
**To:** CPRA Master Plan  
**Subject:** Public Comment

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Hello!

I am reaching out to voice my emphatic support for the 2023 Coastal Master Plan. I feel especially supportive of the plan's utilization of canal backfilling. I live in New Orleans and work in Belle Chasse where my role involves organizing educational outreach and volunteer efforts that center around the critical importance of preserving wetlands and restoring Louisiana's coast. As someone living less than 100 miles from the Gulf of Mexico, and with loved ones living in between, the land loss crisis in Louisiana is one that I consider most gravely significant. Without a healthy coast, there is no future for Louisiana.

Most sincerely,  
Amy Stone

## CPRA Master Plan

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**From:** Saturday, March 25, 2023 8:12 PM  
**Sent:** CPRA Master Plan  
**To:** text\_0.txt  
**Attachments:**

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

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Hello, I am writing to voice my support for the  
CPRAs Master Plan for 2023.



This message was sent to you by a T-Mobile wireless phone.

Hello, I am writing to voice my support for the CPRAs Master Plan for 2023.

## CPRA Master Plan

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**From:** April Bellow  
**Sent:** Saturday, March 25, 2023 8:22 PM  
**To:** CPRA Master Plan  
**Subject:** Public comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

To whom it may concern,

As a resident of St. Bernard Parish, native to Jefferson Parish, employed in Orleans Parish, working with an ecotourism business in Plaquemines Parish, I feel optimistic knowing that there are so many people working to create a more resilient and sustainable coast.

I know that there are going to be many changes coming and my biggest hope is that priority will be given to LOCAL organizations, businesses, fishermen and students to participate in the work.

Thanks to Restore the MS River Delta, CRCL & Chefs Brigade, I've been able to learn about the importance of the work being done but also the environmental impacts if nothing is done vs projects like the diversions.

I also hope that as the Barataria project moves forward that the opening, monitoring of salinity in the estuaries and input from folks who have a deep understand of those estuaries (from the water) are consistently prioritized and adjustments made to minimize harm.

Best,  
April Bellow  
504-982-6565

Sent from my iPhone



## CPRA Master Plan

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**From:** Ivy Mathieu  
**Sent:** Saturday, March 25, 2023 8:41 PM  
**To:** CPRA Master Plan  
**Subject:** Public comment on 2023 Coastal Master Plan

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

As a Retiree/Community Volunteer of St. John the Baptist my ask for CPRA is to rethink and redesign the structure of the mission of this agency. It is evident that spending billions on moving earth and dirt to "restore" the coast is a race that cannot be won against accelerating climate warming. Instead, **the ask is for direct funding to coastal communities to:** elevate houses; reestablishing native plants and trees to absorb increase rain water; preserve and grow cultural heritage sites and practices; employ social scientists on staff to aid in the planning and handling of the trauma of natural disasters including smart community design and building in concert of a warming climate; employ and engage tribal and culture bearer knowledge including local fisher persons, hunters, environmental/climate advocates, etc.

If CPRA maintain the current model in restoring the coast without direct community funding then the only winner in this scenario will be the businesses hired to design and move earth to "restore" the coast. It is apparent when the original mission of "restoring" the coast was conceived it lacked vision and inclusion of community at the table, and encompasses one dimensional thinking. Equally as important, there is no sense of urgency being displayed by CPRA because of the static model of 6 year planning without changing course even after the hurricanes ravage the coast line. It appears maintaining business as usual is the real motto of CPRA. Furthermore, as long as the state of Louisiana hitches it's wagon to one industry, oil and gas (which is primarily responsible for warming climate and greenhouse gases), CPRA should minimize investment into "restoring" the coast, and wisely spend the dollars on the people directly, so we the people, can move to higher ground and/or find a way to preserve our unique way of life including preserving our French language. **In other words, break the current model and urgently redeploy an action plan that will directly improve the quality of life for coastal Louisianans today.**

Sincerely,

Ivy Mathieu  
P.O. Box 2491 (509 Foxwood)  
LaPlace, LA 70069  
985-210-6049

p.s. Happy to sit on a community focus group!

## CPRA Master Plan

---

**From:** Marina Clay  
**Sent:** Saturday, March 25, 2023 9:26 PM  
**To:** CPRA Master Plan  
**Subject:** Fwd: Coastal Master Plan

Sent from my iPhone

Begin forwarded message:

**From:** INACTIVE - GOV Coastal <coastal@la.gov>  
**Date:** March 25, 2023 at 9:22:15 PM CDT  
**To:** Marina Clay, Nick Gremillion  
**Subject:** FW: Coastal Master Plan

---

From: David Campbell  
Sent: Saturday, March 25, 2023 9:21:48 PM (UTC-06:00) Central Time (US & Canada)  
To: INACTIVE - GOV Coastal  
Cc: David Campbell  
Subject: Coastal Master Plan

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I write to support the Coastal Master Plan. I serve as president of the Little Tchefuncte River Association and on the board of the Pontchartrain Conservancy. I live on the upper reaches of the Tchefuncte River.

I have monitored water quality issues on the north shore prior to it being taken over by the Lake Pontchartrain Basin Foundation (now Pontchartrain Conservancy). I am quite aware of the trade-offs; however, our association feels there is no better choice than to proceed with the plan, and that the plan includes and is founded on the best science possible.

I have studied the plan, been to the River Center several times and studied much of the data. I am convinced that CPRA is on the right track. I support the plan wholeheartedly.

Thank you.

David Campbell  
11082 Garden Lane  
Folsom 70437

Sent from my iPhone

## CPRA Master Plan

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**From:** Lisa Schexnayder  
**Sent:** Saturday, March 25, 2023 9:31 PM  
**To:** CPRA Master Plan  
**Subject:** Masterplan

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

I support the work to plan the coastal wetlands. It is important for the safety and future of southeast Louisiana.

Thank you,

Lisa Schexnayder

## CPRA Master Plan

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**From:** Patty Ferguson Bohnnee  
**Sent:** Saturday, March 25, 2023 10:40 PM  
**To:** CPRA Master Plan  
**Cc:** Donald Dardar; Angel Verdin; Joel Waltzer;  
**Subject:** Pointe-au-Chien Comment  
**Attachments:** 23.03.25\_PACIT Master Plan Comment.pdf

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**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

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I attach a comment on behalf of the Pointe-au-Chien Indian Tribe.

Patty Ferguson-Bohnee  
Director, Indian Legal Clinic  
Faculty Director, Indian Legal Program  
Sandra Day O'Connor College of Law  
Arizona State University  
111 E Taylor Street, MC 9520  
Phoenix, AZ 85004

*The Sandra Day O'Connor College of Law acknowledges that the law school is located on the ancestral lands of the Akimel O'odham and further acknowledges that Arizona is home to 22 Tribal Nations that comprise 27% of Arizona's total land base. ASU Law recognizes the sovereignty of these nations and seeks to foster an environment of success and possibility for Native American students. Since our founding, the law school has been committed to scholarship, service and teaching in the areas of Indian law and tribal law, and we pledge to continue and expand this work.*

**NOTICE:** This email may contain confidential and privileged material for the sole use of the intended recipient. Any review or distribution by others is strictly prohibited. If you are not the intended recipient, please contact the sender and delete and destroy all copies.

## POINTE-AU-CHIEN INDIAN TRIBE

Chairman Charles “Chuckie” Verdin  
Second Chairman Donald Dardar  
PO Box 416  
Montegut, LA 70377  
(985) 466-3129



25 March 2023

Coastal Protection & Restoration Authority  
150 Terrace Avenue  
Baton Rouge, LA 70802  
Via email [masterplan@la.gov](mailto:masterplan@la.gov)

Re: 2023 Draft Coastal Master Plan

To Whom It May Concern:

On behalf of the Pointe-au-Chien Indian Tribe, we submit these comments in response to the 2023 draft master plan. Tribal leaders and members have reviewed the plan and the proposed projects and are thankful for the opportunity to provide context, feedback, and suggestions on the proposed master plan.

### BACKGROUND

The Pointe-au-Chien Indian Tribe is a state-recognized tribe located along Bayou Pointe-au-Chien in the southern part of Terrebonne and Lafourche Parishes. We have lived in the Terrebonne Basin since time immemorial. We have always stewarded the land along bayou Pointe-au-Chien and within our Tribal territory. Historically, the Tribe benefitted from the abundance of the rich and fertile land that the Terrebonne Basin offered. The Mississippi river carried topsoil to our lands, replenishing it, and barrier islands protected us from flood waters. Tribal members were fishermen, hunters, and farmers. We have lived a subsistence lifestyle along with our land, and never at the expense of it.

After the leveeing of the Mississippi River and damming of Lafourche des Chitimachas (Bayou Lafourche) in 1904, and since oil and gas were discovered in the Tribal territory in the 1930s, the Tribal community has suffered from coastal erosion, land loss, increased salinization, hurricane winds, flooding, subsidence and sea level rise. The Pointe-au-Chien territory includes diverse resources, including birds, plants, animals, fish, cemeteries, sacred sites, and village sites. While the Tribal community continues to be a fishing community, environmental problems threaten the continued existence of the community. As a frontline community located in the fastest eroding basin in the United States, the Terrebonne Basin serves as the last line of defense for coastal Louisiana.<sup>1</sup>

The Tribe and its members have been forced to adapt to the changing conditions while continuing to advocate for restoration of our land, so that we can continue our lifeways and culture. The cultural heritage and lifeways of the Pointe-au-Chien people are threatened by the changing environment. Due to the changing environment, entire tribal villages have been abandoned.

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<sup>1</sup> Ferguson-Bohnee, Patty, The Impacts of Coastal Erosion on Tribal Cultural, 29 FORUM J. 58 (2015), available at [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2742326](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2742326).

Many of the Tribe's members currently reside in lower Pointe-au-Chien and the vast majority live in Terrebonne and Lafourche Parishes. The adaptation measures taken by Tribal members have not been sufficient to withstand the increased hurricane strength, and the lack of resources has prohibited Tribal members from hardening their homes for the increased winds. There has been insufficient investment to address these changes. On August 29, 2021, Hurricane Ida landed in Pointe-au-Chien causing mass destruction, leaving only twelve homes in the Tribal village habitable. Federal resources are not sufficient to support equitable rebuilding, and the Tribal territory lacks sufficient restoration projects. Further, many projects have focused on providing enhanced fishing opportunities for sports fishermen and not on creating a sustainable residential community.<sup>2</sup> The current water source to the homes is not drinkable and often has brain-eating amoebas. To date, there has not been substantial investment to reverse the harms caused by the government's decision to levee the Mississippi River or the land destruction caused by oil and gas in our area. Further, we were not consulted on these decisions that have intimately impacted our lives and put us more at risk for environmental harms.

Notwithstanding, we have hope for the future, and will continue to serve as stewards of our area and advocate for restoration projects that are meaningful to our Tribal community and the surrounding communities.

## **PROPOSED PROJECTS**

Several projects in the Draft Master Plan are of interest to the Pointe-au-Chien Indian Tribe. The Tribe's aboriginal territory is located both within and outside of the project areas. The current village site is located within the plans for the Morganza-to-the-Gulf (MTTG). However, our traditional village sites, fishing sites, mounds, cemeteries, and other places of importance, including traditional cultural properties, are located outside of the MTTG levee system. The Tribe has documented many of our sacred and cultural sites and other traditional cultural properties. While some very important sites and mounds are located outside of the proposed project boundaries, many sites would benefit from Project 125, Project 335d, and Project 335e. In addition, these projects would prevent further loss of marsh, which is needed for the spawning of various species which are important to our fisheries.

### ***Project 125 – North Terrebonne Bay Marsh Creation***

The Tribe is supportive of the North Terrebonne Bay Marsh Creation. This area has been particularly impacted by oil and gas cuts in the land which has resulted in land loss and threatens significant sites of importance to the Tribe. This area is in our aboriginal territory and creating meaningful projects are of the great importance to the Tribe for our lifeways, livelihood, and future. Marsh creation is vital to our fisheries and for slowing down storm surge. Marsh creation is also vital to protecting our sacred sites and preventing further deterioration of sites of significance, which includes cemeteries, medicinal plants, sacred sites, village sites, and fishing areas.

### ***Projects 335d and 335e – East Terrebonne Landbridge***

The Tribes is supportive of the Eastern Terrebonne Landbridge. The areas in and around Projects 335d and 335e are in the Tribe's aboriginal homeland and include cemeteries, sacred sites, mounds, medicinal plans, village sites, and fishing areas. By reducing salinity and wave action, some of our historic sites and

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<sup>2</sup> The Pointe-au-Chien Indian Tribe was excluded from participating in the trustee process which evaluated projects for NRDA funds following the Deepwater Horizon Oil Spill in 2010. The projects funded with NRDA did not take into account the needs of our Tribal community, but instead focused on sports fishermen. See Point Aux Chenes WMA Enhancements, CPRA Website, available at <https://coastal.la.gov/point-aux-chenes-wma-enhancements/>.

medicinal plants may be protected. Reducing wave erosion and slowing down storm surge is important for protecting the current village site and those further inland.

## **CURRENT ADAPTATION MEASURES**

The Tribe is aware of various adaptation measures to deal with the current conditions. Current adaptation measures include elevation of homes to withstand flooding, temporary measures such as hesco baskets coordinated between Terrebonne and Lafourche Parish Levee Districts installed until the levee system is complete, the Morganza-to-the Gulf levee system that will protect the current village from flooding, and a floodgate to prevent flooding from Bayou Pointe-au-Chien. In addition, the Tribe is working with project partners to implement oyster stabilization projects to protect threatened mound sites and has a small grant to backfill an oil canal. The Tribe is also working with Glass Half Full to investigate the using sand from recycled glass project for restoration projects. As noted above, larger measures are needed for coastal restoration, to reduce wave erosion, and to slow down storms as they land on our coast.

## **PROTECTING CULTURAL HERITAGE AND RESOURCES**

The Master Plan should strive to protect the cultural heritage and resources of the Pointe-au-Chien Indian Tribe as part of the State's duty to protect the natural environment and heritage of the state. The Louisiana Constitution provides that "[t]he 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." LA CONST., art. IX, § 1. The Constitution further guarantees "[t]he freedom to hunt, fish, and trap wildlife, including all aquatic life, traditionally taken by hunters, trappers, and anglers, is a valued natural heritage that shall forever be preserved for the people." LA CONST., art. I, § 27. Finally, the Constitution guarantees "[t]he right of people to preserve, foster, and promote their respective historic linguistic and cultural origins is recognized." LA CONST., art. XII, § 4.

The Pointe-au-Chien Indian Tribe's history and cultural resources, inextricably linked to the landscape, are a part of Louisiana history and heritage. The Constitution, through its aforementioned provisions, share the Pointe-au-Chien Indian Tribes' values of protecting the natural beauty of our bayou, protecting our subsistence lifeways, and promoting our cultural heritage. Both the heritage of the Pointe-au-Chien Indian Tribe and the heritage of the state of Louisiana is at risk. The loss of Pointe-au-Chien cultural resources is a loss of Louisiana cultural resources.

## **MOVING FORWARD**

The Tribe has a few recommendations moving forward.

- Respect Traditional Ecological Knowledge. The Tribe has used traditional ecological knowledge to identify places of significance and have partnered with researchers to combine TEK with western science to identify strategies in the project area dealing with climate change impacts, mitigation, and adaptation.<sup>3</sup>
- Consult with the Tribe when developing projects.
- Consult with the Tribe when engaging in projects in our Tribal Territory to ensure that sacred sites and traditional cultural properties are protected and not disturbed.
- Fill in oil canals to prevent further erosion.

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<sup>3</sup> Bethel, Matthew et al., Mapping Risk Factors to Climate Change Impacts Using Traditional Ecological Knowledge to Support Adaptation Planning with a Native American Tribe in Louisiana, J OF ENVIRONMENTAL MANAGEMENT 301:113801 (2022), available at <https://doi.org/10.1016/j.jenvman.2021.113801>.



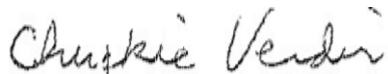
- Consider using the Coastal Zone Management Act to protect the areas in the Terrebonne Basin and the Tribe's territory due to the fragility of the environment and the impact oil and gas exploration has on the ecosystem.

## CONCLUSION

Thank you for allowing us to comment on the Draft 2023 Master Plan. We encourage you to approve Projects 125, 335d and 335e and hope that these projects will be funded. We encourage prioritizing these projects so that work can begin immediately in order to start healing our area and to address the past inequities that threaten our identity, livelihood, and future. We also request that implementation of projects in the Master Plan in our Tribal territory and the development of plans in the future will incorporate our input, TEK, and sacred cultural sites and resources.

If you have any questions regarding our comment, please feel free to contact us at the numbers listed below or our Tribal attorneys Patty Ferguson-Bohnee at [pafergus@asu.edu](mailto:pafergus@asu.edu) or Joel Waltzer at [Joel@wwglaw.com](mailto:Joel@wwglaw.com).

Sincerely,



Chairman Charles "Chuckie" Verdin

(985) 856-5336



Second Chairman Donald Dardar

(985) 852-0659

## CPRA Master Plan

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**From:** Barbara Johnson  
**Sent:** Saturday, March 25, 2023 11:45 PM  
**To:** CPRA Master Plan  
**Subject:** Please vote for 2023 Master Plan!!!

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear LA Legislator:

Our future as a state depends on your leadership and support of CPRA's 2023 Master Plan. Please Vote Yes!!!

Sincerely,

Barbara Johnson

President and CEO

The Great Delta Tours

610 John Churchill Chase St.

New Orleans, La 70130

Sent from my iPhone

## CPRA Master Plan

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**From:** Olivia V  
**Sent:** Saturday, March 25, 2023 11:58 PM  
**To:** CPRA Master Plan  
**Subject:** public comment

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

To whom it may concern,

This is my official comment to be added to the final draft of the 2023 Coastal Master Plan:

*Over 40,000 people have signed my petition to stop this project.* [https://www.change.org/p/save-the-louisiana-bottlenose-dolphin-stop-the-mid-barataria-sediment-diversion?recruiter=1103205988&utm\\_source=share\\_petition&utm\\_medium=copylink&utm\\_campaign=share\\_petition](https://www.change.org/p/save-the-louisiana-bottlenose-dolphin-stop-the-mid-barataria-sediment-diversion?recruiter=1103205988&utm_source=share_petition&utm_medium=copylink&utm_campaign=share_petition)

*The MBSD predicts to restore 21 square miles of new coastline in 50 years in the Barataria Bay. Louisiana loses about 25-35 square miles of coastline a year. The majority of land loss occurs in the Barataria and Terrebone Basins, where 10-11 square miles of land is lost each year.*

*If we are to lose 500 square miles of marsh in 50 years and only gain back 21 – The benefits do not outweigh the detriments.*

The Mid-Barataria Sediment Diversion is a seemingly honorable project. However, too much is at risk. There are proven, more effective ways to restore the coast. Ways that do not brutalize the ecosystems of the marsh, do not raise sea levels, and protect the people that call the coast home. The very lifeblood of a coastal people group and the ecosystem they rely on is at risk. Coastal communities are generational good stewards of the Earth. Living in a high risk environment prone to natural disasters - a threat that is only rising with climate change - instills resiliency in a community. The people of Southern Louisiana know their land and know what it takes to take care of it, rebuild it, and preserve it. Why are their voices pushed to the side? Why are the communities The Mid-Barataria Sediment Diversion are supposed to benefit those most strongly opposed? Indigenous people groups and local advocates for the coast have spoken against this project, and have provided other means of restoration. Why are they being ignored?

There are other means of coastal restoration. The Spanish Pass Project created land. Land that could hold excavators. Backfilling canals has been proven to bring flourishing life to the marsh. Faster than the Diversion will! The people spearheading the MBSD project will not live to see the 20 square miles of benefit. 20 square miles is not enough. Especially when none of that will be above sea level. Especially if all it takes is another hurricane to completely wipe away this project - possibly before it is even completed. The land that is estimated to be restored by the project has also dropped significantly throughout articles over the past few years. Once at 28, now at 20. Which again is just an estimate that cannot be proven. What are we risking here?

The money put towards the Mid-Barataria Sediment Diversion has been grossly misused. It has been used to experiment with the coast, people, and wildlife of our state. Sea levels will rise and

indigenous communities will be forced to move further inland as their voices are once again swallowed by big corporations and state governments blinded by their own personal advancement. The people will hurt. The seafood industry will be hurt. The Louisiana economy will hurt. It begs the question - who are the people that are benefiting from this project? The Diversion has not been proven to even be able to restore this land. What is proven is that 97% of the Bottlenose Dolphin population will die a brutal death. The shrimp and oyster industry will crumble in on itself. The industries that trickle down from fishing will suffer a blow. Bait shops, marinas, restaurants, distributors, the recreational fishing industry and on and on will suffer.

**\$360 million for mitigation of the MBSD's effects on fisheries is inadequate. The fishing industry accounts for 31,000 jobs related to harvesting, distribution, and the processing of seafood. Louisiana's fishing industry grosses \$2.47 billion annually. 80% of the state's commercial population and fisheries infrastructure are accounted for in the communities the MBSD are trying to 'protect'. In an effort to rebuild land the MBSD will strip the coastal communities of their livelihoods.**

Coastal communities live in one of the most dangerous parts of the country not because they do not know the threat that Hurricanes cause. They stay because this is home. This is what they know. To move forward with a project that will destroy their career - their lifestyle? Inhumane. Fishing is generational. You are not just stripping the people of today's futures, but their children's. Immigrants have saturated the waters of Barataria Bay looking to solidify their place in the American dream. They have carved a place for themselves here. Built industries for their children and their children's children. It is an insult to say there will be classes/seminars that will take place for fishermen to find a 'new career'. How insulting. Local industry is not supported by the government. They do not care about the people. The people who will live to see the diversions so called benefits in 50 years will be left with barren land once cultivated by their parents and grandparents. Forced to abandon what has been passed down from parent to child for generations.

Has there been adequate investigation on the Ironton fault line that the Diversion is going to be built on top of? **There is significant risk in loading sediment across an active fault, as the diversion intends to do, and I would go as far as to say that the nightmare scenario would be that induced fault slip would cause an uncontrolled crevasse of the river at the site of the diversion.**

**Another major concern that I have about the diversion is the magnitude of wetlands loss that could be caused by erosion. The models for the diversion project show that flow velocities of water leaving the conveyance structure will be over 20 cm/sec across a large area of existing wetlands. These velocities are more than adequate to cause significant erosion of the marsh sediment.**

Has there been adequate investigation on the carbon emissions that will be caused from this erosion of marsh land? I think that it is also important that a significant portion of the sediment that could be eroded is highly organic, meaning that a very large volume of carbon could be eroded, broken into particulate matter, oxidized, and released to the atmosphere as CO<sub>2</sub>. **There has never been any consideration of this aspect of the carbon footprint of the diversion.**

Those who recognise & follow God are called to be good stewards of the Earth. I believe that the ignoring of other means of coastal restoration, which are safer for the ecosystems, coast, and people of Louisiana, is playing a sick experiment with the land so many people call home. There is a lack of humanity here. I believe that God will be there for His people and restore what will be so unnecessarily lost because of this project. I pray often

for that restoration, He is faithful to provide what the Louisiana Government and the corporations behind this project are so eager to destroy.

Thank you,  
Olivia Van Meter

## CPRA Master Plan

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**From:** Mike Mariana  
**Sent:** Sunday, March 26, 2023 2:14 AM  
**To:** CPRA Master Plan  
**Subject:** I support the master plan

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Good evening. I support the Coastal Master Plan especially the Mid-Barataria Sediment Diversion. Just because some of our politicians and special interests may not, they do not speak for anyone who wants to see another generation prosper here. We need this diversion and more projects to return the Mississippi River natural flow to the Plaquemines Delta. Please consider utilizing more historical distributaries. Thanks, and may God bless your work.

Sent from my iPhone

## CPRA Master Plan

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**From:** Foster Creppel  
**Sent:** Saturday, March 25, 2023 7:22 PM  
**To:** CPRA Master Plan  
**Subject:** Mid barataria distributary

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

As the owner of Woodland Plantation, LLC in Myrtle Grove, La. and the current president of the Plaquemines Parish Tourism Commission I support the MBD.

I also recommend that CPRA budget resources for oyster fisherman to build oyster reefs as sanctuaries, not to be harvested for consumption.

We need them to be part of the team if we have any chance of restoring our vanishing wetlands. CPRA and oyster fishermen need to be allies, not enemies.

Regards,  
Foster Creppel  
Innkeeper  
Woodland circa 1834

## CPRA Master Plan

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**From:** O'Neal, William  
**Sent:** Sunday, March 26, 2023 10:09 PM  
**To:** CPRA Master Plan  
**Cc:** La. Landowners Association  
**Subject:** Public Comment  
**Attachments:** 2023-03-26 21-59.pdf

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

To whom it may concern

Attached please find the public comment letter submitted on behalf of the Louisiana Landowners Association. I look forward to answering any questions you may have.

***William F. O'Neal, CPL***  
**Vice President - Land**  
Castex Energy, Inc.  
Three Allen Center  
333 Clay Street, Suite 2900  
Houston, Texas 77002  
(281) 447-8601 (Main)  
(281) 878-0045 (Direct)  
(225) 573-8200 (Cell)



*Executive Committee*

William O'Neal  
*President*  
Baton Rouge, Louisiana

Chip Vosburg  
*Vice President*  
Lafayette, Louisiana

Dixie Moertle  
*Secretary-Treasurer*  
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Plaquemine, Louisiana

Melinda Bengé Brown  
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Port Allen, Louisiana

John F. "Jeff" Schneider  
Ponchatoula, Louisiana

Russell Walters  
Lafayette, Louisiana

Lori B. Ward  
Marrero, Louisiana



## Louisiana Landowners Association, Inc.

9655 Perkins Rd  
Ste C-271  
Baton Rouge, LA 70810

*M. Taylor Darden, General Counsel*

*Kevin Hayes, Legislative Counsel*

*Caroline Landry  
Executive Administrator*

*Directors Emeritus*  
Charles Leblanc, Jr.  
Gregory C. Lier  
Denis Murrell  
Jake Trewin

March 23, 2023

Coastal Protection and Restoration Authority  
Master Plan Public Comments  
150 Terrace Avenue  
Baton Rouge, Louisiana 70802

RE: 2023 Master Plan Comments

The Louisiana Landowners Association (LLA) is comprised of and represents a plethora of large and small landowners from across the State of Louisiana. LLA membership includes diverse interests from farmers, timber owners, developers, and bankers to ranchers and oil and gas producers all working together to ensure maximum productive use of the State's land resources. The LLA traces its origins to 1975 when the South Louisiana Landowners Association, Inc. was formed to give landowners representation before state and federal government tribunals. By 1977, the new organization had grown to statewide prominence, prompting the deletion of the word "South" from its name. Today, the LLA speaks for the largest collection of landowners owning and managing over one million acres of Louisiana's land, a vast amount of which are in the coastal zone.


While we commend the efforts of the CPRA staff in the development of the 2023 Master Plan, (especially the online interactive map which is a great tool for our membership to visualize the plan throughout the next 50 years), we still feel there is a disconnect between CPRA and the people and companies that own eighty percent of coastal Louisiana. Our members have been involved in coastal restoration efforts long before CPRA was created and have privately funded many coastal restoration efforts. We have a vast history and knowledge of the coastal area of Louisiana and stand ready to share this information with CPRA.

CPRA planners continue to develop concepts for inclusion in the Master Plan without consulting the coastal landowners. Or in some instances over landowners' objections have steadfastly refused to modify or remove project concepts from the plan. Landowner input and involvement is crucial given the fact that much of the land along the coast is held in private ownership. Landowners are not merely 'stakeholders', we are integral partners with CPRA for the successful implementation of the Master Plan. More credence must be given to the people who live, work, and pay taxes in the area of proposed protection. Additionally, the plan must speak to the fact that projects will be considered only when there are willing landowners; expropriation must not be a tool used to accomplish this plan.

We support the continued use and implementation of the Conservation and Restoration Partnership Fund, and further, request that the funding for this program be increased annually. Many meaningful projects have been built through this fund. Projects do not have to be multimillion dollar in nature to benefit the overall goals of the Master Plan.

Thank you for the opportunity to submit our comments.

Respectfully yours,

  
William F. O'Neal  
President

## CPRA Master Plan

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**From:** John Koefel  
**Sent:** Monday, March 27, 2023 3:07 AM  
**To:** CPRA Master Plan  
**Subject:** Comment  
**Attachments:** 3.21.23 Implementation Guidelines Comments from John Koefel.pdf

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Masterplan@LA.gov

March 21, 2023

Comment LA Master Plan for Coastal Restoration (Orleans/Pontchartrain)

This comment on the restoration of lands destroyed by the Mississippi River--Gulf Outlet (MRGO) is in support of that restoration without delay, and to the fullest extent we can. However, the restoration may be ineffective and wasted without addressing the major geographic and planning impetus beside it and connected to it. This is the MRGO New Lock Project proposed for the Inner Harbor Navigation Canal (IHNC) or "Industrial Canal". This MRGO section was exempted from closure in Orleans Parish in 2008 after Katrina but remains a flood threat within the city and a risk to same wetlands we seek to improve.

The Inner Harbor Navigation Canal is old MRGO methodology and authorization. The canal is said to be obsolete. Yet it is dangerous and still rides with exemption of "Necessity" for navigation, despite its record of flood and destruction and the potential for more. The Corps of Engineers (COE) proposes intervention that intensifies environmental risk at great cost. The costs of flood are not borne by the agency that takes care of the channel, or the industry, but are certainly a concern for the nation and citizens, and are strongly related to integrity of the wetlands. Projects and responsibility are balkanized here but the reality is complex and interrelated.

In the Lower Ninth Ward over a thousand people died when this MRGO IHNC canal breached in 2005. Citizens still pay the costs of that destruction of homes and family. This deadly canal is planned for expansion within the channel with a new lock further into the city. This MRGO plan is called by proponents "shallower, so ok" but the risk compounds. The canal widens the cut in the eastern coastal plain that has been the major cause of the environmental destruction we now consider for significant public expenditure for even partial wetland restoration. We fix coastal margins without considering the full risk from remaining MRGO channel and plans for its "improvement".

Without a thorough reassessment of the full extent of the MRGO-still-with-us we will not be fully engaging the problem of coastal restoration that is the objective here. We will be throwing good money into a dark place. We must come to grips with the liability of this channel. So far it has been the public subsidizing this navigation channel and its failures. We need to look at this process and its full geography, and be willing to examine the plan that has been largely out of public reach.

It seems necessary to recognize that MRGO remains authorized in a critical section of the coast that is most vulnerable, and that this exemption for navigation may be counterproductive and injurious to coastal restoration. MRGO-IHNC and its ambitious lock replacement poses a threat to the safety and security of the environment and local communities. Spending big funds to fix the coast ruined by MRGO without considering the threat that remains seems imprudent. The world is not as isolated from itself as discrete projects imply. One has only to look, or to flood, to understand.

We must recognize that the COE has not been impartial in its analysis in this matter of the whole because of its commitment to navigation as priority and its compartmentalized planning. The MR Levee Protection Authority yields protection to the authorized navigation project in the obsolete channel. When the river is high this area will flood first. The priority of navigation interests over environment and community seems near the root of the problem here. This imbalance of consideration seems structural. Certainly MRGO methodology is an impetus without scientific consideration of the whole. If COE had planned more broadly and thoroughly this restoration would not have been needed in the first place. Or if there had been more accountability for risk and damages the exposure would not have been so long. If we continue MRGO and the free pass for navigation we will never heal the environment.

The navigation solution COE continues for the Industrial Canal is to bring the river further into the city some distance while establishing a large new lock seated in a heavily toxic canal bottom, and to fortify the sides of this long canal with high walls, while bridges stay up more for marine traffic on higher water. But that plan is no answer to the broad question of environment. To boost navigation by jeopardizing the City and risking the coast? That is the old way, the MRGO way, and why we write today.

As we consider restoration of the wetlands destroyed by MRGO we should not be exempting remnant MRGO as "Necessity" to navigation, when the Necessity of coastal integrity and safety of the City is much, much greater need. If we are to be safe and our investments in coastal restoration making sense, we need to factor the remaining MRGO authorized channel as high expense and high risk. Counterproductive. Obsolete and dangerous. A time bomb.

We can do better. There are other options. We are not opposed to navigation but need better planning that is connected with environmental longevity.

We ask for consideration of this matter in the interest of protecting our coast and coastal communities.

Thank you,  
John Koefel  
Citizens Against Widening the Industrial Canal  
New Orleans  
Johnkoefel@gmail.com  
504-615-7266

## CPRA Master Plan

---

**From:** Marina Clay  
**Sent:** Monday, March 27, 2023 8:49 AM  
**To:** CPRA Master Plan  
**Subject:** FW: Possible Spam: Final comments on 2023 Master Plan!

Additional comments from Michael Tritico below.

**Marina Gelpi Clay** | Coastal Protection and Restoration Authority

Director of Communications and Engagement  
150 Terrace Avenue | Baton Rouge, LA 70802  
o: 225.342.0168 | c: 985.718.8560  
[www.coastal.la.gov](http://www.coastal.la.gov)



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**From:** Michael Tritico  
**Sent:** Saturday, March 25, 2023 3:44:55 PM (UTC-06:00) Central Time (US & Canada)  
**To:** INACTIVE - GOV Coastal <[coastal@LA.GOV](mailto:coastal@LA.GOV)>  
**Subject:** Possible Spam: Final comments on 2023 Master Plan!

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Relocation, relocation, relocation!

Michael Tritico  
Restore Explicit Symmetry To Our Ravaged Earth



**Nicholls State University**

**Office of the President**

P.O. Box 2001 | Thibodaux, LA 70310 | 985.448.4003 | 985.448.4920 [F]

March 17, 2023

**Via Electronic Transmittal Only**

Chip Kline  
Executive Assistant to the Governor for Coastal Activities  
Chairman, Louisiana Coastal Protection and Restoration Authority Board  
P.O. Box 94004  
Baton Rouge, LA 70804

Dear Mr. Kline:

On behalf of our university, please know my support for CPRA's 2023 Coastal Master Plan.

As the closest university to the region of greatest land loss and subsidence in the state, together with 87% of our students, faculty, and staff living in communities of coastal parishes, we at Nicholls understand first-hand the coastal problems faced by the state. And since our doors opened in 1948, our campus here in Thibodaux is closer to the nearest Gulf coastline than ever before. We are proud of our 75-year history of serving coastal communities and supporting their resilience, and we join you in continuing commitment to these goals. Through the developing Coastal Center on our campus, we look forward to a greater relationship with CRPA in addressing the state's coastal problems, which, as you are aware, are as critical in our service region as any other.

As per the agreement we signed with Governor Edwards in 2019, the Coastal Center will address coastal issues with particular attention to the dynamics of the Atchafalaya and Terrebonne basins. Our science and engineering faculty have undertaken research and environmental assessment in these basins for many years now, and their expertise will form the basis of our team at the Coastal Center.

I appreciate CPRA's efforts in continuing to involve the public in the development of the Coastal Master Plan. In a parallel fashion, our coastal team is working with regional levee and freshwater districts to develop the most effective and economical programming for our future work.

We support the 2023 Coastal Master Plan, and we look forward to serving our communities and the Louisiana coast.

Sincerely,

Jay Clune, PhD  
President



**Nicholls State University**

**Office of the President**

P.O. Box 2001 | Thibodaux, LA 70310 | 985.448.4003 | 985.448.4920 [F]

March 17, 2023

**Via Electronic Transmittal Only**

Chip Kline  
Executive Assistant to the Governor for Coastal Activities  
Chairman, Louisiana Coastal Protection and Restoration Authority Board  
P.O. Box 94004  
Baton Rouge, LA 70804

Dear Mr. Kline:

I am writing to acknowledge our university's support for CPRA's 2024 Annual Plan. The suite of projects designed to restore islands and shoreline, create marsh, improve flood protection and river hydrology, and address climate issues in Louisiana directly impacts our university's service region and both improves opportunities for our students and protects their homes.

As the closest university to the region of greatest land loss and subsidence in the state, together with 87% of our students, faculty, and staff living in communities of coastal parishes, we at Nicholls understand first-hand the coastal problems faced by the state. And since our doors opened in 1948, our campus here in Thibodaux is closer to the nearest Gulf coastline than ever before. We are proud of our 75-year history of serving coastal communities and supporting their resilience, and we join you in continuing commitment to these goals. Through the developing Coastal Center on our campus, we look forward to a greater relationship with CRPA in addressing the state's coastal problems, which, as you are aware, are as critical in our service region as any other.

We support the 2024 Annual Plan, and we look forward to joining you in serving our communities and the Louisiana coast.

Sincerely,

Jay Clune, PhD  
President



Albertine Marie Kimble  
10653 Hwy 39  
Carrville, LA 70010

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2023 MAR 27 P 1:03

CPRA

March 22, 2023

Coastal Protection Restoration Authority  
Master Plan Public Comment  
150 Terrace Avenue  
Baton Rouge, LA 70802

Dear CPRA,

I am a life long resident of the east bank of Plaquemine Parish. I have supported all of the State's coastal master plans from the beginning in 2007. I have lived with the disappearing coast and have been a supporter of "diverting the Mississippi River to sustain our coast". I know that using the Mississippi River is a major part of sustainability. When a coastal project is constructed utilizing the river sediments to create instant wetlands, it make sense to create the new land in areas that have access to the river. Certain coastal projects that are not sustainable, are omitted from the master plan. I have seen the master plan change throughout the years. More levee projects are included but, I want to state that levees are a last resort. Everytime a new levee is constructed it can impact communities in a negative way, while



also providing a positive of no flooding inside the levee. A levee to me is a false sense of security and it can fail. While commenting on levees I would like to state a few comments about the new Western Shoreline protection levee which required NO mitigation to impacted wetlands for the project. That is due to the state working on the Maurepas Swamp Diversion. It makes sense that neither the diversion or the levee project will pay mitigation for any impacts to wetlands. Finally, great work for the state and the COE. So now that this has been accomplished, I am hopeful that this example to make projects forward can apply to local governments also. Plaquemine Parish has new levee work presently in construction and a new sediment diversion permitted and funded. SO. Well, I expect the same courtesy in my parish. A priority for the parish is outfall maintenance of the Noone and West Pointe-a-la-Hache siphons. I have waited 32 years. It should NOT take years to complete outfall maintenance on a coastal restoration project. I still have a least five years for MBSD to be constructed. MBSD is the talk of the parish. I believe it would be beneficial to the state to include a look at a Fladgate on Wilkinson Canal to offset mitigation to the Myrtle Shore Community. The levee alignment doesn't seem to make sense and if changed it could relieve concerns of any impacts in my opinion to Myrtle Shore Community for MBSD. Everything changes just like this coastal master plan. The plan is a complete plan for the State of Louisiana. Not every parish will be saved. They can't be sustained because it is already



to late. Hurricanes are changing the landscape  
so dramatically. Therefore, changes will  
continue to happen. I want to add that  
maintenance should be mandatory on all projects  
that are already constructed and presently in construction.  
This is vital to our eroding coast.

Sincerely,  
Albino McKimble

Coastal Protection & Restoration Authority  
Master Plan Public Comments  
150 Terrace Avenue  
Baton Rouge, LA 70802

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2023 MAR 27 P 12:34

CPRA

The 2023 Louisiana's Comprehensive Master Plan for a Sustainable Coast (4th Edition) presents well as a nice publication but I find it doesn't necessarily reflect what is happening in practice or in reality. My comments address concerns, observations and solutions.

The Master Plan predictions of land loss and storm surge are based off of computer generated models thus the predications could be misleading, as they can be manipulated easily to justify proposed projects. During a community meeting I attended in October, 2022, held by the Louisiana Coastal Protection and Restoration Authority (CPRA), the audience was only presented with compelling, computer generated graphs of what will happen if nothing is done. My impression was these computer generated models were being used to promote fear and perhaps to reduce or even eliminate public comments and inquiries into proposed projects in the Master Plan.

The equal division of the \$50 Billion total budget, which allows for \$25 Billion for Restoration Projects and \$25 Billion for Risk Reduction Projects, seems arbitrary. It is important to note that this grandiose budget does not appear to include common sense ditch clearing, maintenance and widening as needed, to allow for rain and flood waters to flow freely rather than backing up onto private property and roads. The fact that there are multiple federal, state and local agencies and authorities mandated to address sustainable coastal and flood protection further complicates the division of the total budget and allocation of funds. Moreover, the division of the total budget becomes irrational when restoration projects are being compromised or even destroyed by risk reduction projects.

As an example, the \$28M post-Katrina Bayou Bonfouca Marsh Creation project successfully completed will be compromised if not obliterated by the proposed Slidell Levee "risk reduction project" for storm surge protection. Notably, CPRA has acknowledged flooding outside of levees will be increased by virtue of the levees. Federally sponsored by the US Fisheries & Wildlife Service and ironically sponsored locally by CPRA, who supports the Slidell Levee, the Bayou Bonfouca Marsh Creation project created 604 acres of marshland and nourished another 310 acres of marshland with sediment pumped from Lake Pontchartrain. Historic marsh ponds also were restored. The potential obliteration and squander of the \$28M cost of the Bayou Bonfouca Marsh Creation "restoration project" in favor of what seems to be an ill-conceived, very costly "risk reduction" levee project (that won't protect against rain or riverine flooding) defies logic and underscores how economic prudence becomes diminished.

Local parish levee boards appear to be acting on special interests by prioritizing certain projects, without regard to the negative impact on neighboring parishes or even within their own parish. For instance, in order of priority, the breakwater for the Eden Isles subdivision located along Lake Pontchartrain in Slidell, to be funded through the Gulf of Mexico Energy Security Act (Dept. of the Interior), is to be completed before the two other planned breakwaters for the immediate neighboring communities to the west and east of Eden Isles - Carr Dr. and Lakeshore Blvd. - both

designed but not funded. Four Board Members for the St. Tammany Levee, Drainage, and Conservation District reside in Eden Isles. The construction of the Eden Isles breakwater likely will cause neighboring communities to experience increased flooding and collection of debris, by pushing additional waters in their direction. These breakwaters ought to be constructed simultaneously, if they are constructed at all. Furthermore, Eden Isles also seeks protection by constructing a levee ring around its development. This would cause increased flooding of communities outside of the levee. Prioritizing certain projects based on special interests, especially the interests of those in public service, indicates such projects are not taking into account the general public's best interest.

Unified efforts are fundamental to the public's best interests. For example, levees on the south shore and north shore of Lake Pontchartrain would only seem to result in pushing flood waters back and forth between both shores. Working in cooperation and engaging in productive communication about projects in the works needs to be fostered among the various agencies and authorities mandated to address sustainable coastal and flood protection. Evaluating projects before being implemented to assure they will not be counterproductive to other projects is pivotal to the success of flood protection measures.

Viable solutions that benefit everyone must take priority. Barrier island, coastal and marsh restoration through dredging ought to be the highest priority as the first line of defense that has served as the primary protection for flood prone coastal areas for centuries. Once initially restored as needed, periodic restoration maintenance will need to occur. This seems far more effective and practical than the required upkeep of building back up levees as they breakdown, as they do not provide the same widely beneficial flood protection results. Dredging will increase volume capacity for improved water retention in coastal bodies of water and will provide the much needed sediment to restore these crucial areas for lasting sustainability. Also of utmost importance ought to be the re-initiation of the Army Corps of Engineers' Barrier Plan to control flood waters at the Rigolets and Chef Menteur Pass areas for the benefit of all parishes under threat of storm surge flooding. Spending billions of dollars on multiple, localized projects, that in many instances likely will work against each other, is futile if not reckless when clearly viable solutions for the collective good exist.

Finally, among the primary causes of harmful flooding is unbridled development and development destroying wetlands, which need to be eliminated. Eden Isles is just one example of a development utilizing in-fill and concrete pour into what formerly was 5,300-acres of marshland, resulting in millions of dollars of subsequent flood protection costs where the greatest natural resource for flood protection once existed. Common sense development (e.g., low density, raised structures, no concrete slab homes) in environmentally sensitive areas, along with the implementation - once and for all - of a permanent, federal moratorium on development in wetlands, are paramount to protecting against harmful flooding. Without this, the Master Plan merely becomes academic.

Submitted by:

Bonnie Clements

Slidell, St. Tammany Parish, 70460

(985) 326-9733



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2023 MAR 17 A 11:07

CPRA



Gulf Intracoastal Canal Association  
PO Box 2698  
Covington, LA 70434  
[www.gicaonline.com](http://www.gicaonline.com) · 985-302-6666

March 14, 2023

Coastal Protection & Restoration Authority (CPRA)  
Attention: Master Plan Public Comments  
150 Terrace Avenue  
Baton Rouge LA 70802

**Subj: DRAFT 2023 Coastal Master Plan Comments**

Dear Sir or Madam:

Thank you for the opportunity to comment on Louisiana's 2023 Draft Coastal Master Plan. GICA is a 118-year-old trade association representing over 160 member companies involved in towboat and barge operations, shipping, shipyards and associated maritime industries which use the 1300 miles of Gulf Intracoastal Waterway (GIWW) between Brownsville, Texas and St. Marks, Florida. GICA is committed to facilitating commerce through ensuring safe, reliable and efficient Gulf Coast waterways.

The GIWW is the third busiest inland waterway in the nation for tonnage handled after the Mississippi River and Ohio River. However, for cargo value, it ranks as one of the highest nationally. The GIWW provides the connective tissue linking our **nation's** petrochemical epicenters in southwest Louisiana and Texas with the rest of the country through direct access to the Mississippi River system. Any structures placed along the GIWW, and any modification to the navigable channel's configuration, must be managed in close consultation with the maritime industry. Early and effective communication is essential to ensure any proposed changes will not disrupt or endanger commercial navigation which could result in **national level supply chain disruptions**. In addition, the GIWW is critical to Louisiana's economy, each year facilitating over 70 million of tons of petrochemical, oil, finished products and other commodities through the state to, and from, key markets.

Recognizing the importance of a working coast throughout all CPRA planning phases contributes significantly to ensuring long term economic viability for many industries doing business in Louisiana. Quite simply, without a sustainable coast, there is no GIWW. Generally, GICA recognizes and agrees that the state's land loss problems will need a comprehensive array of restoration projects and supports barrier island building, marsh creation, hydrologic and ridge restoration, shoreline protection, and oyster reef restoration.

As with the 2017 Master Plan, our review of the 2023 Draft Master Plan resulted in no specific objections to the suite of projects outlined in the plan. **However, any proposed diversion projects impacting routine water flow on the GIWW and any proposed structures restricting the channel or forming a closure on a navigable waterway should be coordinated with GICA from the outset of the design and permitting process to identify and manage any potential navigation safety concerns.**

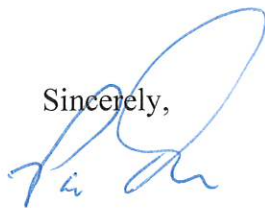
Additionally, GICA requests to be included in all future discussions and plan development for the following specific projects noted in the DRAFT 2023 Coastal Master Plan:

- |                                   |            |
|-----------------------------------|------------|
| 1. Lafitte Ring Levee Project     | (ID# 083)  |
| 2. Iberia/St. Mary Upland Levee   | (ID# 150)  |
| 3. Atchafalaya Diversion          | (ID# 362)  |
| 4. Morganza to the Gulf           | (ID# 110B) |
| 5. Slidell Ring Levees            | (ID# 032)  |
| 6. Abbeville and Vicinity         | (ID# 292)  |
| 7. Amelia Levee Improvements      | (ID#144)   |
| 8. Upper Barataria Risk Reduction | (ID# 082)  |

All these projects either **directly impact the GIWW** or include the installation of “barge gates” of varying sizes on what appear to be ancillary and/or connecting waterways to the GIWW. Early coordination with GICA during the planning and design of these projects is critical to ensure any possible impacts to marine transportation are identified and appropriate mitigations taken to ensure continued safe navigation and maritime transportation efficiencies. Planners are strongly urged to carefully consider gate sizing, operations, and locations to minimize navigation restrictions.

GICA appreciates Louisiana’s comprehensive approach to coastal restoration and looks forward to supporting CPRA’s efforts in the future.

Sincerely,



**Paul Dittman**

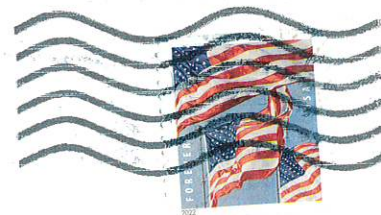
President

Gulf Intracoastal Canal Association

Gulf Intracoastal Canal Association  
PO Box 2698  
Covington, LA 70434

NEW ORLEANS LA 700

15 MAR 2023 PM 2 L



Coastal Protection and Restoration Authority  
Attention: Master Plan Comments  
150 Terrace Avenue  
Baton Rouge, LA 70802

*Stuart*  
~~*Stuart*~~  
*Brown*

70802-807950





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CPRA



Gulf Intracoastal Canal Association  
PO Box 2698  
Covington, LA 70434  
[www.gicaonline.com](http://www.gicaonline.com) · 985-302-6666

March 14, 2023

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Baton Rouge LA 70802

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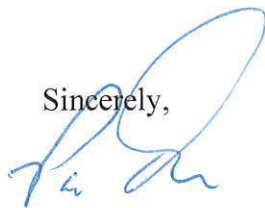
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| 7. Amelia Levee Improvements      | (ID#144)   |
| 8. Upper Barataria Risk Reduction | (ID# 082)  |

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GICA appreciates Louisiana’s comprehensive approach to coastal restoration and looks forward to supporting CPRA’s efforts in the future.

Sincerely,



**Paul Dittman**

President

Gulf Intracoastal Canal Association

Gulf Intracoastal Canal Association  
PO Box 2698  
Covington, LA 70434

NEW ORLEANS LA 700

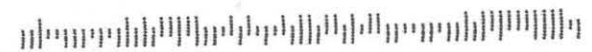
15 MAR 2023 PM 2 L



Coastal Protection and Restoration Authority  
Attention: Master Plan Comments  
150 Terrace Avenue  
Baton Rouge, LA 70802

*Stuart*  
~~*Stuart*~~  
*Brown*

70802-807950



# LAFOURCHE BASIN LEVEE DISTRICT

February 7, 2023

DONALD R. HENRY  
EXECUTIVE DIRECTOR

ERIC MATHERNE  
ST. CHARLES PARISH  
PRESIDENT

JEFFERY HENRY  
ASCENSION PARISH  
VICE-PRESIDENT

## COMMISSIONERS

ARTHUR BOSWORTH IV  
ST. JAMES PARISH

CRAIG CARTER  
ASSUMPTION PARISH

KEVIN HEBERT  
ST. CHARLES PARISH

JAMES P. JASMIN  
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RUSSELL LOUPE  
ST. CHARLES PARISH

MICHAEL MCKINNEY, SR.  
ASCENSION PARISH

MARLIN ROGERS  
ST. CHARLES PARISH

LARRY SORAPURU  
ST. JOHN THE BAPTIST  
PARISH

GARY WATSON  
ST. JOHN THE BAPTIST  
PARISH

21380 HIGHWAY 20  
POST OFFICE BOX 670  
VACHERIE, LOUISIANA 70090

Phone: 225-265-7545

Fax: 225-265-7648



Bren Haase  
Executive Director  
Coastal Protection and Restoration Authority  
150 Terrace Avenue  
Baton Rouge, LA 70802

**Reference: Comment Regarding the Upper Barataria Risk Reduction Project (Project ID: 082) in the 2023 Draft Master Plan**

Dear Mr. Haase,

I am writing to request clarification regarding changes to the Upper Barataria Risk Reduction Project reflected in the draft version of the 2023 Master Plan.

The draft plan presents a substantially different scope for the project than that proposed in the 2017 Master Plan. The Lafourche Basin Levee Board (LBLD) was unaware of these changes prior to the publication of the draft plan, and the changes do not appear to align with our previous conversations with CPRA or recent efforts by the US Army Corps of Engineers (USACE) to advance the project. The major changes are summarized in the table below.

Item	2017 Master Plan	2023 Draft Master Plan
Cost Estimate	\$941M	\$570M
Elevations (ft NAVD88)	12.5-15	10.5-15
Length of T-wall	8,200 ft	4,100 ft
Sluice gates	four 10-ft gates	Six gates, size not specified
Drainage pumping capacity	6,837 cfs across eight stations	Unspecified "pump stations improvements"

LBLD expected this project to change to align with the federal Upper Barataria Risk Reduction project as described in the USACE Chief of Engineers' report dated January 29, 2022 and authorized in the Water Resources Development Act of 2022. That project concept has a total estimated cost of \$1.65B, elevations between 13.5-18.5 ft NAVD88, and nearly 15,000 feet of T-wall.





LBLD respectfully requests a meeting with CPRA regarding these changes prior to finalizing the Master Plan to ensure all stakeholders for this project have the same goals. As the project owner, LBLD has a vital interest in understanding all plans and efforts related to this project. The 2023 Master Plan is particularly important as it will set the State's policy for implementation of this project over the next six years.

Thank you for your attention to this request. We look forward to meeting with you and your staff on this critical project and continuing our combined efforts to advance to construction.

Yours truly,

**LAFOURCHE BASIN LEVEE DISTRICT**

Donald Ray Henry, Executive Director

Cc: Mr. Chip Kline, CPRA



# Share Your Thoughts on the 2023 Draft Coastal Master Plan!



circle meeting location:

Baton Rouge | Houma | New Orleans | Lake Charles

Name: Scott LAVERGNE  
City, Parish, Zip Code: 129 Country LN LAKE CHARLES, LA 70607  
Email: scott@cameronassessor.org  
Comments: For the record. I support ~~shore~~ and  
recommend shoreline protections & storm surge  
protection projects. for the future of planning  
within the State Coastal Master Plan for  
SW LA

[for more space, flip over to continue writing]

Not sure what you want to say yet? You can 1) fill out a comment form using the QR code to the right or online at <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>, 2) email us at [masterplan@la.gov](mailto:masterplan@la.gov), 3) mail CPRA a letter. Public comments will be accepted through **March 25, 2023**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



# Share Your Thoughts on the 2023 Draft Coastal Master Plan!



circle meeting location:

Baton Rouge | Houma | New Orleans | Lake Charles

Name: Gus Fontenot  
City, Parish, Zip Code: Lake Charles, LA 70601  
Email: gusteaux@yahoo.com  
Comments: Shoreline protection is critical to the long-term sustainability  
of this region. Please include protections for SWLA in your Master Plan.

[for more space, flip over to continue writing]

Not sure what you want to say yet? You can 1) fill out a comment form using the QR code to the right or online at <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>, 2) email us at [masterplan@la.gov](mailto:masterplan@la.gov), 3) mail CPRA a letter. Public comments will be accepted through **March 25, 2023**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



# Share Your Thoughts on the 2023 Draft Coastal Master Plan!



circle meeting location:

Baton Rouge | Houma | New Orleans | Lake Charles

Name: Katie Armentor  
City, Parish, Zip Code: Grand Chenier, Cameron, 70643  
Email: karmmentor@cameronpj.org  
Comments: It is imperative that we focus all efforts into  
stabilizing the coast. Until breakwaters are  
installed along the entire coast, it is irresponsible  
and wasteful to invest in marsh creation.

[for more space, flip over to continue writing]

Not sure what you want to say yet? You can 1) fill out a comment form using the QR code to the right or online at <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>, 2) email us at [masterplan@la.gov](mailto:masterplan@la.gov), 3) mail CPRA a letter. Public comments will be accepted through **March 25, 2023**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.





# Share Your Thoughts on the 2023 Draft Coastal Master Plan!



circle meeting location:

Baton Rouge | Houma | New Orleans | Lake Charles

Name:

Ron Johnson

City, Parish, Zip Code:

Cameron Parish 70631

Email:

sherifronjohnson@gmail.com

Comments:

For the record I support and recommend shoreline protection projects and storm surge protection projects to be my highest priorities for future planning within the state Master Plan for SWLA.

[for more space, flip over to continue writing]

Not sure what you want to say yet? You can 1) fill out a comment form using the QR code to the right or online at <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>, 2) email us at [masterplan@la.gov](mailto:masterplan@la.gov), 3) mail CPRA a letter. Public comments will be accepted through **March 25, 2023**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



# Share Your Thoughts on the 2023 Draft Coastal Master Plan!



circle meeting location:

Baton Rouge | Houma | New Orleans | Lake Charles

Name:

Chelsea Carroll Champagne - Cameron Parish

City, Parish, Zip Code:

110 Smith Circle <sup>Cameron</sup> or Asst. District Atty.

Email:

Chelsea@cameronla.org

Comments:

for the record. I support & recommend shoreline protection projects & storm surge protection projects to be my highest priorities for the future of planning within the state Coastal Master plan for SWLA

[for more space, flip over to continue writing]

Not sure what you want to say yet? You can 1) fill out a comment form using the QR code to the right or online at <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>, 2) email us at [masterplan@la.gov](mailto:masterplan@la.gov), 3) mail CPRA a letter. Public comments will be accepted through **March 25, 2023**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.





# Share Your Thoughts on the 2023 Draft Coastal Master Plan!



circle meeting location:

Baton Rouge | Houma | New Orleans | Lake Charles

Name: Marlene Friis

City, Parish, Zip Code: New Orleans, Orleans, 70115

Email: mfriis@tulane.edu

Comments: I would love to see more qualitative (interview-based) human data, especially from the communities most affected by large-scale engineering projects. Rather than being relegated to the mitigation portion of the Plan, it would strengthen the Master Plan and build stronger community support if this type of data were given the scientific rigor and attention of quantitative ecological data.

(for more space, flip over to continue writing)

Not sure what you want to say yet? You can 1) fill out a comment form using the QR code to the right or online at <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>, 2) email us at [masterplan@la.gov](mailto:masterplan@la.gov), 3) mail CPRA a letter. Public comments will be accepted through **March 25, 2023**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



2/7/23

# Share Your Thoughts on the 2023 Draft Coastal Master Plan!



Name:

Justin Kray

Baton Rouge | Houma | New Orleans | Lake Charles

City, Parish, Zip Code:

New Orleans, Orleans Parish, 70119

Email:

justinkray@gmail.com

Comments:

I would like to know why the draft master plan makes no reference to the dozen or more new LNG refining & export facilities currently being considered, all of them in coastal plain areas; some of them are designated for wetland repair conservation - this seems to me like a glaring inconsistency in terms of site planning, permitting & consideration of mutual impacts.

[for more space, flip over to continue writing]

Not sure what you want to say yet? You can 1) fill out a comment form using the QR code to the right or online at <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>, 2) email us at [masterplan@la.gov](mailto:masterplan@la.gov), 3) mail CPRA a letter. Public comments will be accepted through **March 25, 2023**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.





CPRR needs to leverage its authority to increase its involvement in permitting happening at other state agencies (such as DEQ), and develop processes for evaluating consistency of these large scale industrial facilities upon its own plans & designs.

With the amount of \$\$ being spent on restoration efforts, surely the time & effort in human resources are justified to ensure that industrial schemes do not spoil or ruin the well-intended resources of CPRR in the field. -J. Long

# Share Your Thoughts on the 2023 Draft Coastal Master Plan!



circle meeting location:

Baton Rouge | Houma | New Orleans | Lake Charles

Name: Breanna Roberts

City, Parish, Zip Code: Luling, St Charles Parish 70070

Email: \_\_\_\_\_

Comments:

How does projects proposed by the Master Plan  
impact state/local economy and workforce?

[for more space, flip over to continue writing]

Not sure what you want to say yet? You can 1) fill out a comment form using the QR code to the right or online at <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>, 2) email us at [masterplan@la.gov](mailto:masterplan@la.gov), 3) mail CPRA a letter. Public comments will be accepted through **March 25, 2023**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



# Share Your Thoughts on the 2023 Draft Coastal Master Plan!



circle meeting location:

Baton Rouge | Houma | New Orleans | Lake Charles

Name: Julia Clark

City, Parish, Zip Code: New Orleans, Orleans, 70115

Email: julia.veysset.62@gmail.com

Comments: I wish some metrics reflected the number of households, people, businesses, schools, hospitals and so on are impacted by these decisions. Instead of justifying these decisions with dollar amounts, use more human related data points. Thank you for all you are doing. I hope that you will continue to DO MORE! Use all authority you can to prove to US, the public, that you are not going to allow petrochemical  
[for more space, flip over to continue writing]

Not sure what you want to say yet? You can 1) fill out a comment form using the QR code to the right or online at <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>, 2) email us at [masterplan@la.gov](mailto:masterplan@la.gov), 3) mail CPRA a letter. Public comments will be accepted through **March 25, 2023**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



plants to destroy our homes, our lives, our health, and  
our economy.

# Share Your Thoughts on the 2023 Draft Coastal Master Plan!



circle meeting location:

Baton Rouge | Houma | New Orleans | Lake Charles

Name:

Rhonda Louque

City, Parish, Zip Code:

Paulina, St. James, 70763

Email:

louquegirls@hotmail.com

Comments:

Master plan is very encouraging just  
concerned on flooding in St James while  
Master plan is being implemented / approved

[for more space, flip over to continue writing]

Not sure what you want to say yet? You can 1) fill out a comment form using the QR code to the right or online at <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>, 2) email us at [masterplan@la.gov](mailto:masterplan@la.gov), 3) mail CPRA a letter. Public comments will be accepted through **March 25, 2023**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



# Share Your Thoughts on the 2023 Draft Coastal Master Plan!



circle meeting location:

Baton Rouge | Houma | New Orleans | Lake Charles

Name:

Lenie Laiche

City, Parish, Zip Code:

Pauline, LA. 70763

Email:

Comments:

lenielaiiche@yahoo.com

Concerns on Flooding "St James Parish"  
Land Loss

[for more space, flip over to continue writing]

Not sure what you want to say yet? You can 1) fill out a comment form using the QR code to the right or online at <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>, 2) email us at [masterplan@la.gov](mailto:masterplan@la.gov), 3) mail CPRA a letter. Public comments will be accepted through **March 25, 2023**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



# Share Your Thoughts on the 2023 Draft Coastal Master Plan!



circle meeting location:

Baton Rouge | Houma | New Orleans | Lake Charles

Name: Bennie Caruso

City, Parish, Zip Code: Paulina, St James 70763

Email: ~~caruso~~ 123@yahoo.com

Comments: please help us not flood

[for more space, flip over to continue writing]

Not sure what you want to say yet? You can 1) fill out a comment form using the QR code to the right or online at <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>, 2) email us at [masterplan@la.gov](mailto:masterplan@la.gov), 3) mail CPRA a letter. Public comments will be accepted through **March 25, 2023**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.





# Share Your Thoughts on the 2023 Draft Coastal Master Plan!



circle meeting location:

Baton Rouge | Houma | New Orleans | Lake Charles

Name: Therese Roche

City, Parish, Zip Code: Pauline LA ST-James Parish 70763

Email: tr Roche1@yahoo.com

Comments: Support MASTER Plan

We support the levee to go across ST-James Parish  
to Ascension Parish to stop flooding in ST-James

[for more space, flip over to continue writing]

Not sure what you want to say yet? You can 1) fill out a comment form using the QR code to the right or online at <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>, 2) email us at [masterplan@la.gov](mailto:masterplan@la.gov), 3) mail CPRA a letter. Public comments will be accepted through **March 25, 2023**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.





# Share Your Thoughts on the 2023 Draft Coastal Master Plan!



circle meeting location:

Baton Rouge | Houma | New Orleans | Lake Charles

Name: Allen Rouillier Jr

City, Parish, Zip Code: GRAMERCY, ST. JAMES 70052

Email: \_\_\_\_\_

Comments: PASS THE 2023 LA. COMPREHENSIVE  
MASTER PLAN FOR A SUSTAINABLE COAST

WE SUPPORT LEVEE GOING ACROSS ST. JAMES PARISH

[for more space, flip over to continue writing]

Not sure what you want to say yet? You can 1) fill out a comment form using the QR code to the right or online at <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>, 2) email us at [masterplan@la.gov](mailto:masterplan@la.gov), 3) mail CPRA a letter. Public comments will be accepted through **March 25, 2023**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



# Share Your Thoughts on the 2023 Draft Coastal Master Plan!



circle meeting location:

Baton Rouge | Houma | New Orleans | Lake Charles

Name: Brian Bourgeois

City, Parish, Zip Code: St. James 70763 Paulina

Email: Cypress 5053 at G mail .com

Comments: we need levee protection at 10'  
I own 25 acres survey shows straight  
down the center of property.

[for more space, flip over to continue writing]

Not sure what you want to say yet? You can 1) fill out a comment form using the QR code to the right or online at <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>, 2) email us at [masterplan@la.gov](mailto:masterplan@la.gov), 3) mail CPRA a letter. Public comments will be accepted through **March 25, 2023**. Feedback will be used in the development of the final master plan, and all comments received will be included in the final master plan's appendices.



1/30/2023 4:14:28 PM

Greg Meyer

Braithwaite Plaquemines

70040

Did You Attend a Public Hearing? No

I spend just about every day in the Bohemia spillway (Mardi Gras Pass). I have hunting and fishing businesses there. I have seen first hand the immense land building occurring before my eyes. I m also a 5th generation resident in a home on the river that was built in 1721. I am extremely supportive of sediment diversions back into the estuaries.

2/2/2023 2:40:41 PM

Julia

70119

Did You Attend a Public Hearing? No

I am curious if it is known how much damage to the wetlands has been caused by the dredging of canals by the private sector. What is being done to prevent future dredging of canals? Is this practice still allowed? What is being done about the existing canals? What can we do to protect the wetland from further destruction by the oil and gas sector?

2/5/2023 5:31:34 PM

Stanford Owen

Slidell, St Tammany, 70461

Did You Attend a Public Hearing? Yes, in New Orleans

PUBLIC COMMENT                      Response to Proposal DRAFT CPRA Master Plan 2023 I respectfully request that CPRA fully consider including the entire Military Road area into consideration for protection from the Slidell Levee proposed by the St. Tammany Parish Levee Board or other more advanced tidal protection considerations, including the CSX Railroad proposal outlined in 2018. Military Road, by my description, is the entire area East and South of I-10 and North of US Hwy 190 (Short Cut Road). This entire area is subject to storm surge, and, by CPRA's own data, is the single most at-risk area in the State of Louisiana. Had Hurricane Katrina tracked only 10 miles to the West, this area would have been under 25 feet of water at peak surge (as in Waveland, MS) To date, this area has been excluded from consideration for mitigation or protection. To be clear, this area is as large in physical size as the City of Slidell, has an equivalent population (25,000+-), and contains large numbers of economically important businesses (200+). The area functions as a single unit economically. Most residents shop, attend school, and socialize within these boundaries. It accounts for a large portion of tax revenue for St. Tammany Parish. I represented this area politically as a councilman/police juror and was involved in Corp plans for flood protection from 1984—1992. I am aware of all river, stream, and tidal events to the area since 1979. To exclude this area would have immediate negative economic consequences from insurance rates to home value, even if another event never occurs. Building a protection Levee around greater Slidell and excluding Military Road will increase storm surge greater than if the Levee were never constructed, as demonstrated in surge models presented by Rand Corporation as well as CPRA's own models, due to the barrier effect such a levee will have on a rapidly rising tidal surge on the northeast wall of such surge. To date this area has received very little attention or feedback since no proposals have been forthcoming. As the newly appointed Levee Board member from this area I want to forcefully suggest any further plans include a comprehensive evaluation of impact on Military Road residents. Attached is an aerial picture of Military Road with boundaries described above. The area under triangle are levee proposed areas considered by the US Army Corp. As you can see, 14 large subdivisions are excluded and will suffer greater storm surge than naturally predicted, with such levee. Sincerely, Stanford A. Owen, MD 117 Shirmac Drive Slidell, La 985-649-0732 Board Member, St. Tammany Levee and Drainage District

2/6/2023 2:57:56 PM

JAMES

MANDEVILLE

Did You Attend a Public Hearing? No

To whom it may concern: I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan. Coastal land loss is one of the most significant and urgent issues facing our state. As such, restoration projects must be implemented as soon as possible. With every minute lost, we are losing ground. Our state must act to advance an equitable, safe and flourishing coast for Louisiana's communities, ecosystems and economy. Louisiana has made significant progress in implementing restoration projects across the coast. We must continue. To ensure a better future for our state, we must move forward to build and sustain the Mississippi River Delta. Because they can make the most impact over time and support other investments made in restoration and risk-reduction projects, I believe the state should focus funding on large-scale projects first. I strongly support the draft Coastal Master Plan. I am encouraged to see that it includes implementation periods that prioritize how projects should be advanced over time. I also support the Master Plan process, as it is publicly informed and grounded in the best available science. It also balances coastal restoration with protection and is realistic about the challenges we face along our coast. This process should serve as a model for how to involve experts, residents and other stakeholders in the decisions, and the foundation in science is of critical importance. I encourage the state to continue to find opportunities to reach wider audiences. I also encourage CPRA to continue to find new and accessible ways to include all stakeholders in the process. The Master Plan Viewer is a welcome tool for communicating with people about projects in their own backyards.

2/6/2023 3:31:39 PM

Sarah Giles

Chalmette, LA 70043

Did You Attend a Public Hearing? No

To whom it may concern: I am a member of the Board of Directors of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan. Coastal land loss is one of the most significant and urgent issues facing our state. As such, restoration projects must be implemented as soon as possible. With every minute lost, we are losing ground. Our state must act to advance an equitable, safe and flourishing coast for Louisiana's communities, ecosystems and economy. Louisiana has made significant progress in implementing restoration projects across the coast. We must continue. To ensure a better future for our state, we must move forward to build and sustain the Mississippi River Delta. Because they can make the most impact over time and support other investments made in restoration and risk-reduction projects, I believe the state should focus funding on large-scale projects first. I strongly support the draft Coastal Master Plan. I am encouraged to see that it includes implementation periods that prioritize how projects should be advanced over time. I also support the Master Plan process, as it is publicly informed and grounded in the best available science. It also balances coastal restoration with protection and is realistic about the challenges we face along our coast. This process should serve as a model for how to involve experts, residents and other stakeholders in the decisions, and the foundation in science is of critical importance. I encourage the state to continue to find opportunities to reach wider audiences. I also encourage CPRA to continue to find new and accessible ways to include all stakeholders in the process. The Master Plan Viewer is a welcome tool for communicating with people about projects in their own backyards.

2/7/2023 8:03:34 AM

Brock Piglia

Mandeville

Did You Attend a Public Hearing? Yes, in New Orleans

To whom it may concern: I am a Board Member of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan. Coastal land loss is one of the most significant and urgent issues facing our state. As such, restoration projects must be implemented as soon as possible. With every minute lost, we are losing ground. Our state must act to advance an equitable, safe and flourishing coast for Louisiana's communities, ecosystems and economy. Louisiana has made significant progress in implementing restoration projects across the coast. We must continue. To ensure a better future for our state, we must move forward to build and sustain the Mississippi River Delta. Because they can make the most impact over time and support other investments made in restoration and risk-reduction projects, I believe the state should focus funding on large-scale projects first. I strongly support the draft Coastal Master Plan. I am encouraged to see that it includes implementation periods that prioritize how projects should be advanced over time. I also support the Master Plan process, as it is publicly informed and grounded in the best available science. It also balances coastal restoration with protection and is realistic about the challenges we face along our coast. This process should serve as a model for how to involve experts, residents and other stakeholders in the decisions, and the foundation in science is of critical importance. I encourage the state to continue to find opportunities to reach wider audiences. I also encourage CPRA to continue to find new and accessible ways to include all stakeholders in the process. The Master Plan Viewer is a welcome tool for communicating with people about projects in their own backyards.



2/7/2023 8:54:48 AM

John Morello

Baton Rouge, East Baton Rouge, 70810

Did You Attend a Public Hearing? No

I strongly support the draft Coastal Master Plan. I am encouraged to see that it includes implementation periods that prioritize how projects should be advanced over time. I also support the Master Plan process, as it is publicly informed and grounded in the best available science. It also balances coastal restoration with protection and is realistic about the challenges we face along our coast.

2/7/2023 2:57:26 PM

Devyani Kar

Baton Rouge

Did You Attend a Public Hearing? Yes, in Baton Rouge

To whom it may concern: I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan. Coastal land loss is one of the most significant and urgent issues facing our state. As such, restoration projects must be implemented as soon as possible. With every minute lost, we are losing ground. Our state must act to advance an equitable, safe and flourishing coast for Louisiana's communities, ecosystems and economy. Louisiana has made significant progress in implementing restoration projects across the coast. We must continue. To ensure a better future for our state, we must move forward to build and sustain the Mississippi River Delta. Because they can make the most impact over time and support other investments made in restoration and risk-reduction projects, I believe the state should focus funding on large-scale projects first. I strongly support the draft Coastal Master Plan. I am encouraged to see that it includes implementation periods that prioritize how projects should be advanced over time. I also support the Master Plan process, as it is publicly informed and grounded in the best available science. It also balances coastal restoration with protection and is realistic about the challenges we face along our coast. This process should serve as a model for how to involve experts, residents and other stakeholders in the decisions, and the foundation in science is of critical importance. I encourage the state to continue to find opportunities to reach wider audiences. I also encourage CPRA to continue to find new and accessible ways to include all stakeholders in the process. The Master Plan Viewer is a welcome tool for communicating with people about projects in their own backyards.

2/7/2023 3:50:23 PM

Thomas Mavor

New Orleans 70124

Did You Attend a Public Hearing? Yes, in New Orleans

I support the master plan. As an educator in high school, I am working with my 8th grade students at Brother Martin High School to educate the young men on the issues of coastal land loss and restoration. Also, please consider creating a viewing platform for the Barataria Diversion! We need to be able to "see" these solutions so we can spread the word on their effectiveness.

2/7/2023 5:34:14 PM

Giancarlo Portocarrero

Luling, St. Charles, 70070

Did You Attend a Public Hearing? Yes, in New Orleans

Has CPRA taken into account possible contamination by heavy metals present in construction materials? And how will this affect our local ecology and fauna?

2/8/2023 6:32:59 PM

Chris Cook

New Orleans, Orleans,

70125

Did You Attend a Public Hearing? No

Build the diversions! The longer we wait, the less Louisiana there will be. Dredging cannot get us out of danger, and I don't want South Louisiana to wash away. The dolphins will go out to sea when the time comes.

2/8/2023 8:08:18 PM

Elon Glickman

New Orleans, Orleans, 70119

Did You Attend a Public Hearing? No

Seeing how Louisiana's coast is rapidly eroding due to climate change and fossil fuels, I believe that the Coastal Master Plan should not fund any more petrochemical industrial expansions. This plan should only fund coastal restoration projects that provide green jobs with livable wages to the people most impacted by coastal land loss. We can't keep allowing the industries who caused climate change and eroded our coast to continue operating. We need to transform our economy to one that is sustainable and we have the money to do so here. Let's use it to save our coast and give Louisianans jobs they can be proud of.

2/8/2023 8:09:26 PM

Sarah A Singh

70119

Did You Attend a Public Hearing? No

As a member of sunrise New Orleans and advocate for the opposition of further industrial construction in the Gulf South, we beseech you NOT to use this budget toward further industrial activity in petrochemicals. To do so would be to blatantly ignore that expansion of industry as opposed to investment in communities most directly impacted negatively by oil and industry is this project's priority. We must acknowledge the harms of continual expansion: we must instead commit to spending this budget on the communities most harshly impacted, in their livelihoods (e.g. clean air and environments) and jobs. Please put your muscle where your rhetoric is and stand behind equitably using this budget.

2/8/2023 8:10:41 PM

Chris Hochkeppel

New Orleans, LA,

70119

Did You Attend a Public Hearing? No

The communities that are most effected by climate change should benefit directly from this funding. There's should be more allocation for community improvements in places like Terrebonne parish. No money should go towards industrial expansion until individual communities are aided in resorting their land.



2/9/2023 10:23:03 AM

Scott Reppel

Buras, Plaquemines, 70041

Did You Attend a Public Hearing? No

I'm all for the Diversions. I have seen what they call Neptune Pass has done on the east side of the River across from Buras. There are willow trees growing where we use to fish oysters. It did destroy the oyster beds by covering them with silt but the marsh is beautiful over there. The fishing is also much better on the eastside. The marsh land is totally gone on the west side of the river. The gulf is basically up against the levee back at the Buras Boat Harbor. It's open water all the way to Scofield Beach. With no marsh habitat on this side of the river I have seen the fishing decline over the years. We need a diversion on this side of the river also, even if it is a small one to help build it back some. As far as the oyster fisherman, the state should cancel most of the leases. Most are not even fished anyways. Something should have been done years ago. The material dredged from the river to keep Southwest Pass open should be pumped into some of these areas to build back land instead of being dumped offshore. Hopefully the Planned Diversions will move forward with construction and not be halted by lawsuits.

2/10/2023 12:22:15 PM

Rayna Carner

New Orleans, 70118

Did You Attend a Public Hearing? Yes, in New Orleans

1. Could you have a section that explains the differences between a diversion project and the marsh creation projects? This would probably counter some of the fishermen's points that don't favor the diversion. 2. Are there EIS (environmental impact statements) for each of the projects outlined in the master plan? There's a very comprehensive one for the MBSD. If so, could they be referenced or attached to the master plan? I'm curious and concerned if new coastal wetlands created by MCPs and diversions provide the same sort of ecosystem services that "natural" wetlands provide. 3. pg 60 under diversion says these projects prevent saltwater intrusion into the estuary I feel like you have to say "newly built" estuary. Yes, estuaries are freshwater ecosystems, but this wording hides the fact that you're replacing a salt-water ecosystem with a freshwater ecosystem; a new freshwater can kill things that thrive in a saline environment. It just feels a bit greenwashed. 4. I know that the master plan is the guideline/resource for implementing future projects, but I really think that flooding mitigation must be prioritized. Especially in the locations where diversions and/or other projects make communities more susceptible to storm-surge flooding. Have these communities been warned, or will they be warned, that future projects increase their risks of flooding?

2/13/2023 3:37:14 PM

Tom Barrett

Cameron

Did You Attend a Public Hearing? No

It is imperative that the shoreline protection projects and storm surge protections be the highest priorities for the State Coastal Master Plan for SW Louisiana. Shore line protection and surge protection have proven to be effective. I support and recommend these projects for the Master Plan.

2/13/2023 8:27:18 PM

Susan Racca

Cameron

Did You Attend a Public Hearing? No

For the record, I support and recommend shoreline protection projects and storm surge protection projects to be my highest priorities for the future of planning within the State Coastal Master Plan for SWLA."

2/13/2023 8:29:05 PM

Madison Guilbeaux

Grand Lake Cameron parish 70607

Did You Attend a Public Hearing? No

For the record, I support and recommend shoreline protection projects and storm surge protection projects to be my highest priorities for the future of planning within the State Coastal Master Plan for SWLA."

2/14/2023 8:33:21 AM

Jessica Aguiard

Lake Charles, Calcasieu,

70607

Did You Attend a Public Hearing? No

For the record, I support and recommend shoreline protection projects and storm surge protection projects to be my highest priorities for the future of planning within the State Coastal Master Plan for SWLA.

2/16/2023 7:22:27 AM

Earl Joseph Melancon Jr.

Baton Rouge

Did You Attend a Public Hearing? No

I am commenting on the East Bayou Lafourche Marsh Creation proposed project. Please be aware that a 40-acre Alternative Oyster Culture (AOC) park with multiple oyster farms exist within the footprint of the proposed project. The AOC park is privately owned and operated under the company name, Southern Belle Oysters/Grand Isle Sea Farms, LLC. The park is very active, and several of the farms within, as well as the park itself, have been awarded funds through the Louisiana Sea Grant's AOC program funded by the Louisiana Department of Wildlife and Fisheries (LDWF). Much more information can be provided. Please contact me for more details. Thank you.

2/16/2023 7:22:43 AM

Anne Klenke

Sulphur, Calcasieu, 70665

Did You Attend a Public Hearing? No

I am encouraged to see East Calcasieu Lake Marsh Creation and Mermentau Basin Hydrologic Restoration in the plan. Please be aware that during the development of the Just Imagine Planning effort of the 50-year Resiliency Plan for Cameron and Calcasieu Parish 10 catalytic projects were developed and voted by the people. The #1 project selected was Coastal Flood Risk Reduction. As the area hit with the most devastating, and back to back, impacts in this century, please make SWLA a priority!!



2/16/2023 7:50:28 AM

Earl Joseph Melancon Jr.

Baton Rouge

Did You Attend a Public Hearing? No

I am commenting on the Caminada Bay Marsh Creation and Fifi Island Ridge proposed project. At the most western edge of the project, and south of the small island to be restored, exist a 14-acre Alternative Oyster Culture (AOC) park. The park is administered by the Grand Isle Port Authority. The park is very active, and several of the farms within, as well as the park itself, have been awarded funds through the Louisiana Sea Grant's AOC program funded by the Louisiana Department of Wildlife and Fisheries (LDWF). Much more information can be provided. Please contact me for more details. Thank you.

2/16/2023 7:51:48 AM

Earl Joseph Melancon Jr.

Baton Rouge

Did You Attend a Public Hearing? No

I am commenting on the Calcasieu Ship Channel Marsh Creation proposed project. Outside of the footprint, but near the most western edge of the project, a new 48-acre Alternative Oyster Culture (AOC) park has been established. It is administered by the Cameron Port, Harbor and Terminal Authority. Several of the farms within, as well as the park itself, have been awarded funds through the Louisiana Sea Grant's AOC program funded by the Louisiana Department of Wildlife and Fisheries (LDWF). Much more information can be provided. Please contact me for more details. Thank you.

2/16/2023 8:27:27 AM

Nathaniel Allured

Lake Charles, Calcasieu, 70601

Did You Attend a Public Hearing? No

First Line of Defense - protect the entire Gulf Coast Shoreline. ROCK IT! ROCK IT ROCK IT! \* These projects have proven success within a short duration of being implemented. These breakwaters not only slow the wave action but halt shoreline erosion and enhance fisheries habitat. The sediment that accumulates behind the barriers continue to build land which is a natural process that restores itself. Construction of Shoreline Protection doesn't just protect the coastline but protects State and Federal funded projects that are synergetic, protects critical infrastructure, and protects all communities to our North. • Storm Surge Protection – Second Line of Defense- reduce the risk of flooding by constructing a Flood Protection Berm System. \* These projects have been proven in Southeast Louisiana and have reduced flood insurance to all properties behind the system. It's important to communicate that during the development of the Just Imagine Planning effort of the 50-year Resiliency Plan for Cameron and Calcasieu Parish 10 catalytic projects were developed and voted by the people. The #1 project selected was Coastal Flood Risk Reduction. • Inundation Relief Projects – Due to climate change, sea-level rise, and subsidence our landscape doesn't have the capacity to gravity flow due to the restricted number of outlets throughout the landscape and the occurrence of increasing high tide events. \* Force drainage is desperately needed to offset these flooding impacts. The Mermentau Basin, which is a drainage Basin, hasn't been dredged within 25/30 years. The portion of the GIWW in Cameron Parish hasn't been dredged in over 40 years. These waterways need dredging in order to act more efficiently to benefit drainage. • Number of Projects – The people of the SWLA Region, in addition to Cameron Parish, now see the importance of Coastal Protection and Restoration Projects. By bringing more projects to our side of the State, we can have similar protection for our residents and the assets of our region like our FRIENDS in the Southeast!

2/16/2023 10:27:00 AM

Gus Fontenot

Lake Charles, Calcasieu,

70601

Did You Attend a Public Hearing? No

I am submitting this comment on behalf of the organization I work for, the Southwest Louisiana Economic Development Alliance. Our organization strongly supports shoreline protection projects and storm surge protection projects. They are among our highest priorities for planning our future within the State Coastal Master Plan. Thank you!

2/19/2023 12:08:19 PM

Salvador Naranjo

Lake Charles, Cameron Parish,

70607

Did You Attend a Public Hearing? No

For the record, I support and recommend shoreline protection projects and storm surge protection projects to be my highest priorities for the future of planning within the State Coastal Master Plan for SWLA.

2/20/2023 11:23:32 AM

Jill Galmarini

Lake Charles, Calcasieu, 70605

Did You Attend a Public Hearing? Yes, in Lake Charles

- Shoreline Protection – First Line of Defense - protect the entire Gulf Coast Shoreline. ROCK IT! ROCK IT ROCK IT! \* These projects have proven success within a short duration of being implemented. These breakwaters not only slow the wave action but halt shoreline erosion and enhance fisheries habitat. The sediment that accumulates behind the barriers continue to build land which is a natural process that restores itself. Construction of Shoreline Protection doesn't just protect the coastline but protects State and Federal funded projects that are synergetic, protects critical infrastructure, and protects all communities to our North.
- Storm Surge Protection – Second Line of Defense- reduce the risk of flooding by constructing a Flood Protection Berm System. \* These projects have been proven in Southeast Louisiana and have reduced flood insurance to all properties behind the system. It's important to communicate that during the development of the Just Imagine Planning effort of the 50-year Resiliency Plan for Cameron and Calcasieu Parish 10 catalytic projects were developed and voted by the people. The #1 project selected was Coastal Flood Risk Reduction.
- Inundation Relief Projects – Due to climate change, sea-level rise, and subsidence our landscape doesn't have the capacity to gravity flow due to the restricted number of outlets throughout the landscape and the occurrence of increasing high tide events. \* Force drainage is desperately needed to offset these flooding impacts. The Mermentau Basin, which is a drainage Basin, hasn't been dredged within 25/30 years. The portion of the GIWW in Cameron Parish hasn't been dredged in over 40 years. These waterways need dredging in order to act more efficiently to benefit drainage.
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2/21/2023 3:26:56 PM

Michael Tritico

70652

Did You Attend a Public Hearing? Yes, in Lake Charles

RESTORE P.O. Box 233 Longville, LA 70652 (337)-725-3690 michaeltritico@yahoo.com Mardi Gras 2023 February 21, 2023 Coastal Protection & Restoration Authority Master Plan Public Comments 150 Terrace Avenue Baton Rouge LA 70802 RESTORE's Comments on the 2023 Master Plan Dear Coastal Protection and Restoration Authority: Thank you for the opportunity to submit comments, again, although it is apparent that the many comments I have submitted through the years have had little to no effect. As I testified in the Public Meeting last week, things that I brought up years ago, using documentations, took years to be recognized, admitted, and incorporated into the planning process. It is now too late to even try to implement some of the things that could have worked had they been done at the proper times. Nevertheless I am compelled to continue to try to participate in your planning system. From the deepest parts of the ocean to the top of our atmosphere, from the poles to the Amazon rain forest, from the Gulf Coast beach to the piney woods, humans have ruined what God created. The other people who spoke at the Burton Coliseum in Lake Charles last week proved that the old mindsets of denial of reality and blind faith in false hopes has not weakened. Calling for more dredgings when dredging is one of the things that destroys the natural equilibria, calling for more levees when levees interrupt natural water flows and sediment distributions, calling for "rocks, rocks, rocks!" when the ocean is swelling to such a height that the mud would not be able to support a wall high enough to keep it out, (and the rocks' deflections of coastal current energies toward Texas would just export problems to those neighbors): those are just wrong-headed wishes from ignorant people who consciously refuse to learn. CPRA is guilty of sustaining the wishful thinking of Louisiana coastal residents instead of telling them the truths that would help them do smart planning. You must stop exacerbating the coastal problems by failing to show leadership and by instead pandering to a herd mentality. Fighting nature is a lost cause. Living in harmony with nature is a necessity. Accordingly, CPRA must dramatically shift its approaches to how it spends the billions of dollars that are being entrusted to it for proper protection of people near coastal areas and proper attempts to restore viable coastal ecosystems. CPRA must decide if it is really anything other than an enabler, a pawn being manipulated for prolonging a dying experiment in non-sustainable economic practices across the Louisiana coastal zone. For example, as long as CPRA assumes that the Calcasieu Ship Channel must be allowed to exist, there can be no restoration of natural balance in that region. Removal of the hemispherical sand bar at the mouth of the Calcasieu River, shortcutting the meander loops upstream, and deepening the channel from 18 feet to 47 feet allows ruinous amounts of saltwater to rush in from the Gulf constantly with the tide and with south winds. When hurricanes come ashore just west of the river, sea water gets into Lake Charles. Meanwhile CPRA has decided to abandon the project that would have directly blocked the incoming salt water and instead spend that \$300+ million to try to sustain the unnatural replacement of brackish and fresh marshes with salt marshes. That is the opposite of coastal restoration and a brazen betrayal of the early hopes that had been held out to those of us who tried to believe that things might be changing for the better. If CPRA wants to do the right thing anywhere in the Calcasieu Basin it must work to get the maritime industry to go to Lighters and stop pushing for dredging. The river must be allowed to

return to its functional ecological morphology. Even though sea level is rising, if the river were allowed to silt in to a shallower depth and the hemispherical sand bar were reestablished, the salt burning of fresh marshes would be greatly-slowed. The declines in aquatic biota, such as speckled trout, would be ameliorated. Nature could begin to heal itself and adapt somewhat to climate disruptions. One thing that should not be too very challenging for CPRA to accomplish as a first step in really facing the Calcasieu Ship Channel disaster would be to calculate how much extra salt comes in for each extra foot of dredged channel depth. I have asked, repeatedly, that those calculations be done and made public but there seems to be some fear of those numbers by the people who want the big ships to be able to get loaded heavier and heavier, without having to pay for the socialist subsidies they get by having someone else pay to dredge, dredge, dredge. Why can CPRA not make part of the 2023 Master Plan a simple project and report: calculation of the degree of saltwater intrusion for each foot of increase in the depth of channel? On the topic of socialism for faux-capitalists: No longer can CPRA leaders allow selfish corporate projects such as the \$400,000 oilfield road (CS-0047) which, in no way could have been justified as either protective of the public or restorative of wetlands. No longer can CPRA leaders “throw good money after bad” by spending money to repair previously-authorized and implemented projects damaged by fresh tropical storms. Lessons must be learned. The public has a right to know annually, through a simple report: each project that sustained storm damage during the passage of the latest storms, to what degree, and what possible logic could exist for going back and spending money again only to risk that new investment rather than spending the money more wisely farther inland. As I said when I spoke at the Public Meeting last week, CPRA would get a lot more “bang for the buck,” by spending money on relocation of people to high ground and elevation of homes for people who actually must live near the coast, people such as shrimpers. It might be a worthwhile expenditure to establish, on high ground in Beauregard Parish, a dedicated evacuation complex for those renewable-resource harvesters so that they could have a greater degree of protection for their families, a secure place to go during storms that might overwhelm the elevation efforts. In general, CPRA should tell everyone else to relocate or not expect repetitive financial bailouts with each of the oncoming storms. Cameron Parish will be under the ocean eventually, as will New Orleans, most of Calcasieu Parish, and most of the populated coastal areas of the planet. Giving people false hope should not be a budget item. The concept of BUDM is, as I have said repeatedly, an oxymoron that every time it is presented shows the shallow-mindedness of planners. Dredging creates numerous problems that moving the mud somewhere else does not solve. Cutting off an arm to cure a wart makes no sense. Beneficial Use of Dredged Material makes the same amount of sense. CPRA must stop participating in that propaganda charade. Absolutely absent from your 2023 Master Plan is consideration of a very acute coastal problem that could be solved almost immediately! I have previously sent to you documentation of how the invasive species *Bos taurus* does not belong near marshes because it forces natural herbivores such as muskrat and insects toward the centers of the marsh. That creates “overgrazing” and “ponding out” of the marshes. Accelerating that process was the misguided practice of killing by traps, poisons, and guns the species *Canis rufus* which the Creator had provided as a protective barrier for the marshes. The Red Wolves did that through prevention of the approach of the large herbivore species *Bison bison*. A few generations of a foolhardy heritage that almost caused the extinction of an entire species is no reason to allow that heritage to continue. CPRA should aggressively educate the young people of Cameron Parish that the wetlands will last decades longer without their husbandry of animals not meant to be there. CPRA could buy and butcher all the cattle in the parish and set up STEM scholarships for the young people with a mere fraction of what you will waste on BUDM projects. Just yesterday it was announced



that the same problem of *Bos taurus* ruining habitats out west has warranted Federal intervention:  
[www.usatoday.com/story/news/nation/2023/02/20/feral-cattle-shot-new-mexico-gila/11303462002/](http://www.usatoday.com/story/news/nation/2023/02/20/feral-cattle-shot-new-mexico-gila/11303462002/).  
On the topic of education: Why not a Migratory Clock at Port Wonder? At Port Leveque, Australia a pop-culture style version of the local phenomenology has become a tourist attraction. It very colorfully shows when certain things happen there. Something really worthwhile CPRA could do would be to shift a few thousand dollars of money that would be washed away at some token BUDM project near the coast to the Port Wonder project for an interactive Migratory Clock. Children could push buttons to light up icons of shrimp, squid, crab larvae, redfish... to see when and where those things go. I have sent you the Migratory Clock Diagram for the Calcasieu Estuary previously but I am going to attach it again in the hope that you will incorporate it into your planning thoughts as well as implement it in the greatly-needed educational expenditures that you should be prioritizing. "Rocks, rocks, rocks!" ??? NO!!! Relocation, relocation, relocation!!! Sincerely, Michael Tritico, Biologist and President of RESTORE  
Restore Explicit Symmetry To Our Ravaged Earth

2/23/2023 2:08:43 PM

Jennifer Sherrod

New Orleans, Orleans, 70118

Did You Attend a Public Hearing? No

To whom it may concern: I am a supporter of the Coalition to Restore Coastal Louisiana, a nonprofit whose mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. I am writing today to contribute my public comments on the draft 2023 Coastal Master Plan. Coastal land loss is one of the most significant and urgent issues facing our state. As such, restoration projects must be implemented as soon as possible. With every minute lost, we are losing ground. Our state must act to advance an equitable, safe and flourishing coast for Louisiana's communities, ecosystems and economy. Louisiana has made significant progress in implementing restoration projects across the coast. We must continue. To ensure a better future for our state, we must move forward to build and sustain the Mississippi River Delta. Because they can make the most impact over time and support other investments made in restoration and risk-reduction projects, I believe the state should focus funding on large-scale projects first. I strongly support the draft Coastal Master Plan. I am encouraged to see that it includes implementation periods that prioritize how projects should be advanced over time. I also support the Master Plan process, as it is publicly informed and grounded in the best available science. It also balances coastal restoration with protection and is realistic about the challenges we face along our coast. This process should serve as a model for how to involve experts, residents and other stakeholders in the decisions, and the foundation in science is of critical importance. I encourage the state to continue to find opportunities to reach wider audiences. I also encourage CPRA to continue to find new and accessible ways to include all stakeholders in the process. The Master Plan Viewer is a welcome tool for communicating with people about projects in their own backyards.

2/27/2023 12:37:53 PM

Zach Monroe on behalf of City of New Orleans

New Orleans, LA 70112

Did You Attend a Public Hearing? Yes, in New Orleans

The City of New Orleans commends the ongoing efforts by our partners at the State and the CPRA to restore and rebuild our coastline. We are happy that major projects for the City and region continue to be included within the Master Plan, particularly the Central Wetlands and the New Orleans East Landbridge. The Landbridge, in particular, will provide hurricane protection to nearly 1.5 million people in the Lake Pontchartrain area, as well as protecting I-10, a major commerce and evacuation route for the entire southeast Louisiana region. While the Landbridge was included in the plan from the 2017 version, a major portion of the Landbridge along Lake Pontchartrain is left out of the 2023 draft. This is despite major projects underway in that area currently, including \$4M in NRDA funding for design and engineering of marsh restoration awarded in Summer 2022. We hope that CPRA and our Federal partners intend to move forward with that project once design is complete. We would also like to point out that land rights issues have been a larger hinderance in the Lake Borgne side of the Landbridge than the Lake Pontchartrain side. The importance of the non-structural program cannot be overstated, both for communities outside of hurricane protection systems and as a means of addressing residual risk for those who live behind levees. The estimated need for \$11B over fifty years coastwide, or roughly \$220M annually, is a far cry from current funding levels. In 2021, Louisiana received less than \$50 million in competitive flood mitigation assistance grants for elevations, acquisition, and other nonstructural programs. Other funding sources used for this type of assistance, including HMGP and CDBG-DR, are dependent on post-disaster funding, which is hopefully not a source of funds to regularly depend on. We urge close coordination between CPRA and other state agencies and programs, including the Louisiana Watershed Initiative, to identify recurring sources of funding to support nonstructural risk reduction. CPRA should explore how the newly created Louisiana Hazard Mitigation Revolving Loan Fund could provide recurring funding for the nonstructural program.

3/5/2023 2:47:11 PM

Alvin E DuVernay III

New Orleans, Orleans, 70124

Did You Attend a Public Hearing? Yes, in New Orleans

These are my public comments on the 2023 Coastal Master Plan. I've observed and intimately lived with the changes to coastal La for two thirds of a century. As an outdoor fanatic and a geoscientist, I must declare that the, mostly anthropogenic, land loss and ecologic destruction is and has been alarming. As such, I couldn't have been more excited when the CPRA was formed and the first Master Plan rolled out after Katrina. I read the plan and reveled in the clear path forward. It articulated what must be done, how to do it and of course the cost. At the time, it looked to me that it was possible to get ahead of the problem. The plan was solid. Over the years my excitement morphed into frustration by the pace of implementation. The need for intervention and action was obvious and demonstrable; the advocacy from scientists and stakeholders was abundant. Equally abundant was the lack of urgency, political will and funding from policy makers and obstruction from special interests which has impaired the sense of urgency and timely progress. Enough already! Our state must act boldly and with resolve to advance an equitable, safe and flourishing coast for Louisiana's communities, ecosystems and economy. The current plan is impressive as were the previous three. It adheres to fundamental scientific method; utilizes cogent modeling, iterations and metrics; and employs multiple, realistic what-if scenarios. The plan thoroughly factors in industry, recreation, and communities (indigenous and non). This is indeed what science should look like and I support it completely. In the last several years my frustration over the pace of implementation has begun to morph back into excitement as I've seen more movement and progress in restoration activity. We have truly made significant progress in implementing restoration projects across the coast. I've worked with CRCL and other restoration groups as a volunteer for over fifteen years. I've lived, worked and played in coastal La for over seventy. I've seen the ecologic destruction due to our activities and/or neglect. Likewise, I've seen the benefits from restoration projects. I believe that restoration should be our top priority – above politics, above fishing, above culture and heritage, economy, energy extraction, transportation, etc. Again, our state must act boldly and with resolve to advance an equitable, safe and flourishing coast for Louisiana's communities, ecosystems and economy. If not, all of the above is moot and/or will cease to exist. I'll end with one example of my personal experience with the coastal issues facing us. It is a true story of degradation and subsequent rejuvenation. Hopefully, this illustrates the importance that the success of this plan is to me and more importantly, the power we have to repair our mistakes when given the opportunity and the will to act. In 1972 I built a camp with my best friend in the upper Barataria Basin near Lake Salvador just South of the current Davis Pond diversion. The 70's were my college and early professional life years where I learned my trade as a sedimentary geologist and paleontologist. It was then that I became aware and intimate with the mechanics of our ecosystems. It was then that I learned of the methodical and unrelenting demise of our coastal environment; of the merciless disappearance of marshlands and islands; of the steady encroachment of salt water. Over the years I observed the relentless mutation of our camp area around Bayou Des Allemandes from a near pristine freshwater environment to one of more saltwater influence and less marshland. Where we used to exclusively catch freshwater species (Bass, Bream and Freshwater Cats), we started catching more saltwater species (Specs, Reds, Hardhead

Cats). The ecologic and environmental transfiguration was stark. Even the bugs changed. For the worst. Then in the early 2000's the Davis Pond freshwater diversion started operating. I'd followed its progress from design through implementation. I'd studied the models and was very hopeful yet not optimistic that I would ever live to see any significant positive impact. I was wrong. Less than two decades later the environment, including the fauna and flora, are as I remember when I first explored and played in the area as a teenager. In my lifetime, Bream and Bass and Catfishing has never been better. I recently toured the Davis Pond area. I walked on floatant marsh and hard ground willow tree forest that just a few years ago was open water. That one project restored, created and sustained land and reversed the certain demise of an entire ecosystem. It's working beyond my wildest dreams. The 2023 Coastal Master Plan is a gem. Work it. Sell it. Fund it. Advocate everywhere. The clock is ticking so try to prioritize the large-scale projects. Fast track the small ones. And every little chance you get – HURRY UP!

3/7/2023 8:56:36 AM

Bek Markel

New Orleans, Orleans, 70125

Did You Attend a Public Hearing? Yes, in New Orleans

It would be great to see more revegetation efforts outlined as well as funding for monitoring efforts over time to study and maintain green infrastructure practices. A new alternative to the dredged MS river sand has surfaced made from locally recycled glass at Glass Half Full in New Orleans. I have personally/professionally be researching the material as plant growth substrate for over a year and it has great potential to supplement land restoration efforts and marsh/swamp plants while substantially diverting landfill waste, as well as involving local community and resources. Funding reusable and recyclable materials and responsible planting efforts will create a positive feedback loop worth considering over more grey infrastructure.

3/7/2023 3:17:34 PM

Nick Harris

New Orleans, Orleans, 70122

Did You Attend a Public Hearing? Yes, in New Orleans

None at this time.

3/15/2023 11:10:42 AM

Kaitlyn Farina

01610

Did You Attend a Public Hearing? No

The Mid-Barataria Sediment Diversion Project is a death sentence for dolphins.



3/17/2023 2:17:09 PM

Karen Chamberlain

70605

Did You Attend a Public Hearing? No

Coastal Restoration has been talked about for many years and while some progress has been made now is the time to aggressively put the research, proven methods and new technologies into a comprehensive strategic plan! As a Board Member of the Community Foundation of Southwest Louisiana, I learned a great deal about this issue as we launched the Just Imagine 50-year Resilience Plan for Cameron and Calcasieu Parish. Through this process despite the varied and many difficulties that our area has faced with multiple natural disasters, the number one project selected was Coastal Flood Risk Reduction. Shoreline protection and storm surge protection are an essential and urgent need to keep our area and state alive and with a hopeful future for our economy, our environment, our safety, and our citizens. I confidently and enthusiastically support the Master Plan Process and the draft plan. I thank you for your consideration and efforts!

3/20/2023 9:12:34 AM

Keree Blanks

New Orleans, LA, 70122

Did You Attend a Public Hearing? Yes, in New Orleans

The Water Collaborative being a Nonprofit organization based in the heart of New Orleans finds it imperative that we provide our comments and opinions of CPRA's 2023 Draft of the Coastal Master Plan. Our work as an organization places us at the crossroads of environmental policy and community preservation/restoration. Many of our collaborators and partners are directly impacted by the effectiveness of the coastal master plan, and we would like to provide CPRA with some thoughtful comments to ensure the master plan is effective and equitable. We are glad to see there are several major improvements from the 2017 Coastal Master Plan. Such as an updated project selection process and criteria, improved predictive and extrapolative models, and the developments of new risk metrics. Also, the addition of dividing the coast into five segments from three and then treating each section as their own region with logistics of what projects will be implemented. This greatly helps residents identify and anticipate the projects and resources that will be available to them. We are glad to see that CPRA is attempting to be more transparent with local communities and the public through a series of public hearings. However, there is so much more they could be doing in the name of equity and cultural inclusion. They have yet to detail their community engagement goals at large, so that it can be evaluated publicly. The engagement that is included in the draft is only relevant to this drafting process. What about the engagement metrics outside of the drafting process? There should be direct engagement goals year round for the many projects CPRA facilitates. Doing this would ensure the public that CPRA has a serious devotion to community engagement on a consistent basis, and outside of coastal master plan drafting. This would also resolve a lot of the difficulties involved in implementing nonstructural risk reduction projects. Which is allotted a whopping \$11.2 Billion dollars. Making a significant commitment to community engagement ensures that proper lines of communication between project management and local communities will be established. Further, simplifying the implementation of nonstructural risk reduction projects. That CPRA cites as a difficult process due to a need for community proposals to identify viable projects. This draft of the Coastal Master Plan alludes to protecting the state's rich history and culture, but does little to nothing to incorporate coastal communities' experience living along the constantly evolving coast. These coastal communities have been consistently marginalized from the benefits of past and present water infrastructure. Yet, they have continued to adapt to the circumstances and live in their communities. This makes them trivial to the master plan's development because they have knowledge and practices that should be incorporated into the plan. The idea that we are not giving a mic to the people directly affected by all this ecological change is a major injustice to them and outright ignorance from scientists. These local communities have been adapting and thriving through their own means for generations. If anybody has insightful comments for the plan it's them. We also find that there is a glaring hole in the draft, because there are no direct watershed management strategies. A lot of the projects in the draft are scoped on the coastal communities, and fail to acknowledge the communities that lie further inland. With the authority that CPRA has there is no reason why they aren't at least collaborating with entities like the Louisiana Watershed Initiative or the Louisiana Department of Transportation & Development. If the goal of the

coastal master plan is to make our coast sustainable, then we should be doing this on a united front across the state through various levels of defense. The 2023 Draft of the Coastal Master Plan is a cumbersome cypress that roots itself in the barren soil that is quantitative data and metrics. We cannot make these vital decisions on the livelihood of our coast with a limited view of the environmental repercussions. Quantitative data is a useful resource, but we cannot neglect the importance of social analyses and community engagement.

3/21/2023 3:12:49 PM

Robert M. Atkins

Shreveport

Did You Attend a Public Hearing? No

Fantastic document, with comprehensive overview of the work being lead by the CPRA. The investment into the repair and protection of the coast is critical to the region, hope this effort continues decades into the future. Robert M. Atkins - CEO BALANCED Media|Technology

3/22/2023 7:50:22 AM

John D. Foret

Lafayette, Lafayette, 70508

Did You Attend a Public Hearing? Yes, in Lake Charles

March 22, 2023 Project Manager 2023 State Master Plan State of Louisiana Coastal Protection and Restoration Authority The Water Campus, 150 Terrace Avenue Baton Rouge, Louisiana, 70802 Dear Sir or Madam, The Rainey Conservation Alliance is a unique, effective, and powerful coalition of landowners and land managers working together in southern Vermilion Parish, Louisiana. Each member of the alliance has a long history in the region and a deep commitment to Louisiana's people, wetlands, waters, and wildlife. Alliance members currently includes E. A. McIlhenny Enterprises, National Audubon Society, Sagrera Lands, and Vermilion Corporation. The alliance represents more than 185,000 contiguous acres of marsh, forested ridges, and beach habitats in Vermilion Parish. Thank you for this opportunity to comment on Louisiana's 2023 Comprehensive Master Plan for a Sustainable Coast. The efforts of CPRA and their team of scientists and engineers are greatly appreciated by the citizens of the Louisiana coastal communities. It is clear that bold action and significant investments are needed if we are to protect and preserve our cultural heritage, ecosystems and natural resources and the very land on which we have built our homes and families. It is recognized that world class scientists and researchers have provided valuable input and insights into how we might reduce the threat of continued and ongoing land loss and flood risk. Based upon our review of this draft Master Plan, we would offer the following comments. 1. There is a lack of transparency in the project development process. Many stakeholders are either left out of the process or are not aware of the planning team activities and meetings. This information isn't getting back to the local communities whose input is so integral to effective projects. Making this part of the plan more open would allow for more robust project ideas as well as more effective projects. Utilizing local knowledge from landowners, local drainage boards, and other community leaders would better inform the scientists and engineers in evaluating and selecting projects. Also, holding meetings more often in the regions will allow as many local participants as possible to attend. 2. We would like to see more risk reduction projects included in the Chenier Plain. There has been and continues to be a disparity between resources allocated to the central and eastern regions of the state with lesser being allocated to the Southwest region. This region has experienced probably the most severe impacts of hurricane damage and land loss than another region of the state. Since 2005, Hurricanes Rita, Ike, Laura and Delta have all caused a combined loss of over \$50 billion and yet, to date, despite billions of dollars in hurricane risk reduction projects in other areas of our coast, no hurricane risk reductions projects have been constructed in Southwest Louisiana. While we support protection for all areas of our coast, Southwest area is and continues to be just as vulnerable to storm surge and economic damages today as we were in 2005. That is unacceptable. 3. We are glad that all shoreline protection projects are going to be considered consistent with the Master Plan. The Southwest region has been requesting shoreline protection projects since the very first Master Plan in 2007. We will continue to ask for shoreline protection resources since the Chenier Plain experiences some of the highest erosion rates along the Gulf Coast. This shoreline protection serves not only to stem the loss of land due to the high erosion rates, but also provides our first, and in some places, our only line of defense when storms occur. It is vital to this area that shoreline protection measures are

employed whenever and wherever possible. 4. We did not see consideration in this draft plan for inundation relief in Southeast Louisiana through a reintroduction of the Pearl River flow into the Mississippi Sound. Flooding concerns by the communities along the Lake Pontchartrain north shore are real, and while a Pearl River reintroduction into the Mississippi Sound would not solve all the concerns, it could be a vital part of the overall solution. 5. Land Bridge versus Ridge Restoration: Please consider emphasizing the restoration of Ridge Restoration Projects with the same intensity as the Land Bridge concepts are in this draft document. As it is well documented, the ridge feature within wetland systems are often the “backstops” for emergent marsh stability, that if allowed to degrade will threaten the sustainability of the emergent marsh habitat in that geographic area. 6. Please consider including a substantial structural risk reduction measure in the Southwest. A review of the proposed Master Plan shows numerous structural risk reduction projects all along the coast with the exception of a portion of Vermilion and Cameron parishes. It is worrisome that protection levees are included to the east of Cameron parish and Texas is advancing their structural measures to the west of Cameron and yet CPRA has left Cameron completely unprotected. Given the activities to the east and west of Cameron parish, it is imperative that a structural protection project spanning the coast from Vermilion to Texas be included. 7. The plan provides mainly large-scale marsh creation and hydrologic restoration measures as restoration strategies in the Southwest. These measures are needed; however, failing to address saltwater intrusion will make these measures much less sustainable. Saltwater intrusion has long been included as the major factor influencing land loss in this area. This is due to the Calcasieu Ship Channel which has outgrown its banks and flows unimpeded into Calcasieu Lake and then into the interior marshes. The connection to the Gulf of Mexico allows saline water from the Gulf to intrude into the interior marshes. This saline water has caused a previously fresh ecosystem to become brackish and saline over time. A salinity control project is needed to restore this area to its previous condition and should be included in this plan. 8. Please consider installing at least one pump station in place of the flap gated culverts proposed as part of the Cameron Creole project. The flap gated culverts will only drain when water levels in Calcasieu Lake and the marsh are sufficient to allow water to flow into the lake. There are times when water levels in the lake are not conducive to flow in that direction. A pump station would allow for active drainage from the marsh platform into Calcasieu Lake independent of the water levels. The feasibility analysis should include at least one alternative with one pump station and not just gravity drained flap gated culverts. Lastly, we would request more from CRPA for the Chenier Plain Coastal Restoration and Protection Authority in terms of funding and in regional consultation. This board was formed to support coastal protection and restoration in Southwest Louisiana and was envisioned to act much as other levee boards (who do have taxing authority and are fully funded) act in the state. However, when formed, the Chenier Plain Board was not given the taxing authority that the other boards have and, as such, has not been able to advance, sponsor or participate in the coastal projects that would benefit our area. This board, adequately funded, could be the regional unifying voice of the people of Calcasieu, Vermilion and Cameron Parishes and provide much needed support and input into the solutions to our coastal issues. In short, they could play a much bigger role in advancing the interests of Southwest Louisiana if they were more fully supported. With Regards, John D. Foret John D. Foret, Ph.D. Executive Director, Rainey Conservation Alliance

3/23/2023 4:14:23 PM

Jeffrey Sadow

Bossier City, La 71113

Did You Attend a Public Hearing? No

A base assumption in the reports, repeating a mistake from 2017, is seriously flawed. Cribbing off of models rather than observations, the 2017 report presented three scenarios that ranged from (in 2023 metrics computed for change since 2017) a rise of 460cm to 900cm over 50 years. The 2023 report did the same but reduced these to two, creating a range of 490cm to 770cm. This attenuation, which took as the low a midrange assessment from the menu of the writers' choices and the high as one of the highest, still varies dramatically from the historical record and, most crucially, with the recent portion of that. As it is, sea level rise has occurred at a constant and relatively slow rate as far back as measurements go (mid-19th century for the oldest and at over a dozen sites since the 20th century), a rate of about 210 to 330cm a century depending upon location. Further, following the catastrophic anthropogenic global warming hypothesis that because carbon dioxide output has increased so dramatically in the past few decades that the rate should accelerate, no such meaningful trend has emerged. In fact, assuming that the trend prior to 1950 was natural and that the following increase in the trend since 1950 was entirely due to humans, that computes to a human influence of only about 90cm a century, calling into serious question validity of the models behind the forecasts used. These observations suggest that the report authors should have used their lowest of the 18 forecasts, or 200 cm, which even then would be about double both the historical trend and that of the last seven decades. Failure to do this has potentially expensive real-life policy consequences. If way overestimating SLR, money could be steered to unnecessary projects or unduly aggrandizing them to protect against an SLR highly unlikely to manifest. It also could affect the balance of spending, where fewer dollars need to go to risk reduction and more to restoration. Realistic, data-driven SLR forecasts need to replace the highly dubious ones on which the entire report is based, and a recalculation of projects' costs and decisions whether to proceed with these must be performed to make for a useful and valid plan.

3/24/2023 9:35:59 AM

Dr. Joseph A. Orgeron, Ph.D.

Golden Meadow, Lafourche,

70357

Did You Attend a Public Hearing? Yes, in Houma

As the Executive Director of Restore or Retreat (a local non-profit focused on the advocacy of large-scale coastal restoration projects), I and our membership of over 150 are in FULL support of the 2023 Master Plan, INCLUDING projects like the Mid-Barataria Sediment Diversion.



3/24/2023 1:57:11 PM

St. Mary Levee District

Morgan City, St. Mary 70380

Did You Attend a Public Hearing? No

Comments TE-110 The St. Mary Levee District shares the goal of the nourishment and building of freshwater marsh, yet we remain concerned that TE-110 has too many negative impacts to justify the positives. We continue to believe that there may be other possible, less expensive options that would achieve similar results without the need for such a major diversion. There are significant negative impacts to industry and navigation that operate in the vicinity of the proposed project location. This project would turn a slack water industrial canal into a flowing waterway. Boat captains that work in that area are concerned with as much as a 1 mph increase in flows. Loading/offloading, shifting of barges/vessels and day to day operations at these docks and shipyards would be drastically impacted by going from slack water to higher velocities. Another impact of the higher velocities would be the possible destabilization of the bulkheads along the area, especially with the additional dredging depths required by the project. Siltation and sediment laden water is another concern that has been brought up by both industry and Terrebonne Parish leaders. Siltation of slips along the GIWW is already a problem, by introducing additional sediment laden water to the area, this problem would be exacerbated. In Terrebonne, they are concerned about "brown" water from the Atchafalaya River impacting the pristine black water of Terrebonne Parish marshes. Alternatives: Seeing the obvious need for pushing the isohaline line further south during summer and low water months, there are possible alternatives. Terrebonne Parish has constructed or are in construction of pump stations that will move fresh water from north to south. If understood correctly, these projects have not been taken into account when modeling the Atchafalaya to Terrebonne project. Since the completion of the Bayou Chene project, SMLD has had flow gauges installed at the site. Over about a 4-month period, mostly during low water, we have been able to track water coming out of Bayou Boeuf. Based on that period, it appears that most of the water that comes down Bayou Boeuf goes down Bayou Chene. We are in the process of installing additional flow/elevation gauges along the GIWW that will give us even more information. Our current information can be shared. With this information, it brings back the question of whether using the closure of Bayou Chene as a diversion could have greater effects to the east. Also, the water out of the Verrett Basin is not sediment laden and better suited for the needs of Terrebonne Parish. This alternative would require modifications to the Bayou Chene project such as a Sector Gate that would allow for navigation, but it could have positive impacts on the target area to the east of Bayou Chene's intersection with the GIWW.

3/25/2023 8:34:15 AM

James Karst

New Orleans, Orleans, 70122

Did You Attend a Public Hearing? Yes, in New Orleans

I strongly support the Master Plan. Please consider more aggressively addressing the causes of coastal land loss, such as carbon emissions and the careless cutting of canals through fragile wetlands.

3/25/2023 11:58:27 AM

Tyler M. Bosworth

Baton Rouge, East Baton Rouge, 70816

Did You Attend a Public Hearing? Yes, in Lake Charles

March 24, 2023 Coastal Protection and Restoration Authority Master Plan Public Comments 150  
Terrace Avenue Baton Rouge, LA 70802 masterplan@la.gov Re: Comments on Louisiana's  
Comprehensive Master Plan for a Sustainable Coast, 4th Edition Dear Chairman Kline and Executive  
Director Haase: We are writing on behalf of the Coalition to Restore Coastal Louisiana (CRCL), the first  
statewide nonprofit organization dedicated to confronting coastal land loss in Louisiana. CRCL is the  
most widely recognized and effective coastal advocacy entity in the state. We represent a unique mix of  
businesses, local governments, industries, scientific communities, national and local conservation  
groups, hunters, anglers, and a broad spectrum of concerned residents. Our mission is to unite people in  
action to achieve a thriving, sustainable Louisiana coast for all. As an organization with longstanding  
interest in coastal projects, we appreciate this opportunity to provide input on the most recent iteration  
of Louisiana's Comprehensive Master Plan for a Sustainable Coast (Coastal Master Plan or CMP). We  
write today to once again express our support of the Coastal Master Plan, a superlative document based  
on world-class science that has guided efforts to understand and address coastal land loss. We applaud  
the inclusive process that the Coastal Protection and Restoration Authority (CPRA) has developed to  
engage communities, industry groups and scientists in the CMP's iterative updates. As Louisiana faces  
more frequent severe weather events, rising sea levels and increasingly challenging decision points  
regarding the natural and built environment, the CMP presents a unified vision with bipartisan support,  
with coastal communities, business interests, environmental advocates and all levels of government  
coming together to inform the solutions identified in this draft plan. The CMP remains a remarkable  
achievement, establishing a programmatic response based on the latest science to address clear and  
present challenges and opportunities for our state. The projects and programs identified are on the  
cutting edge of climate change adaptation and damage mitigation, seeking a more resilient, sustainable,  
and ecologically healthy future while leading the rest of the nation by example. For decades, the  
people of Louisiana have recognized the land-loss challenges we face as a state and have rallied behind  
the government with broad support for plans to tackle the problem. Year after year, we see that support  
grow. Where people used to be wary of large-scale river diversions, poll after poll shows that support for  
such projects has steadily climbed. Where folks used to fear the impacts of coastal projects on fisheries,  
they now understand the importance of these projects and seek to find ways of adapting to maintain  
economic and cultural ties to the coastal landscape. Where people used to shun alternative sources of  
energy in this state, they now broadly support federal legislation such as the RISEE and BREES Acts,  
which seek to give Louisiana a fair share of monies derived from such energy sources. Where people in  
this state used to deny the causal relationship between greenhouse gases and climate change, CPRA and  
the governor put forward a plan to identify opportunities across the state to prepare for climate change  
impacts and meaningfully reduce carbon emissions. That, too, has come with a sea change in public  
opinion. None of this would have happened without the planning and foresight of the coastal program.  
Despite all of these successes, Louisiana's coastal program still faces challenges. The causes of climate  
change have not vanished. Carbon emissions have not been significantly curbed on a global scale. Sea

level rise is projected to continue. Detractors and deniers still seek to sow doubt about the effectiveness of the plan's projects; administrations change, as do their priorities; and long-term funding is not guaranteed. We need to ensure that we maintain the momentum of this administration by ensuring that the next one builds on the progress that has been made and that the plan will continue to be implemented and advanced. We also need to maintain the level of outreach and education to continue to have an informed and engaged public. All of this depends on securing long-term, sustainable funding for the coastal program. While CRCL fully supports the 2023 CMP, we would also like to see more emphasis placed on funding small-scale, distributed restoration projects and support for allowing natural crevasses on the east bank of the Mississippi River such as Neptune Pass to flow and continue to build land, as well as accounting for those effects in the plan. These are truly cost-saving techniques that provide lasting benefits. We would also like to see more support for small-scale distributed and innovative restoration projects. While large-scale projects are vitally important for restoring coastal landscapes at scale, small-scale projects are important for engaging with local communities through volunteerism and addressing granular community needs and opportunities. Additionally, these small projects are nimble enough to pilot innovative practices such as using recycled oyster shells for living shorelines to protect vulnerable Indigenous cultural sites. CRCL's restoration programs have long proved that through a large, diverse volunteer base, small projects can have a significant impact on the landscape directly and on the community indirectly through increasing public engagement and building support for the coastal program. We are grateful for CPRA's support to engage with volunteers to plant 14,500 trees in the Central Wetlands Unit through 2026. We would like to see more opportunities for these types of projects in the future. Nothing, however, is more cost-effective than letting the river flow where it naturally wants to flow. There is a place in coastal Louisiana where this exact thing is happening. South of Port Sulphur, on the east bank of the Mississippi River, there is a stretch of river that is no longer maintained by the Army Corps of Engineers. On that stretch of the Mississippi, the river pours into the marsh through a series of natural crevasses and builds land as a result. The amount of land being created by natural processes would cost the state and federal government hundreds of millions of dollars to build, but the price per acre of new land there is virtually free. We need to fight to maintain this tool in our coastal toolchest. Considering the issue we face with future funding of the program, we need to fight for the continued benefits that these natural features provide us with, because they are the most cost-effective technique we have. CRCL urges CPRA to continue to work with the Corps on any potential dredging issues that could be identified as a hazard to navigation so that they can be addressed in a way that allows the river to flow out into the marsh as freely as possible. In closing, the 2023 Coastal Master Plan is the most comprehensive iteration of the plan we have seen. We commend CPRA and its team for their years of work to produce such a rigorous scientific plan in the name of protecting the people of this great state. Although the challenges we face are some of the most complex and expensive in the world, we have faith in the proven record of CPRA and the plans that they continue to implement. Sincerely, Tyler M. Bosworth Advocacy Director Coalition to Restore Coastal Louisiana

3/25/2023 12:28:12 PM

Marylee Orr

Baton Rouge, EBR, 70896

Did You Attend a Public Hearing? No

The Louisiana Environmental Action Network (LEAN) and Lower Mississippi Riverkeeper (LMRK) welcome the opportunity to submit comments on the 2023 Draft Louisiana Coastal Master Plan (CMP). Many changes have been underway, and some of the same issues remain, since we submitted comments on the 2017 Draft Plan. One of the major areas of change has been the development of a State Climate Policy, with the convening by Governor Edwards of the Louisiana Climate Initiatives Task Force, and their concurrence on a Louisiana Climate Action Plan. LEAN was proud to serve on the Task Force since the climate issue has been a major area of focus for our organization for over 25 years. LEAN and LMRK work to track and assess both air and water permits in Louisiana. The permit process is a key point of intersection with state policy and the climate issue, in particular for the prospects of reaching the Initiative's near-term goal of a 26-28% reduction of net greenhouse gas (GHG) emissions from 2005 levels by 2025. A continual stream of large GHG emitting facilities is being permitted (new and renewed) in the State, including new Liquid Natural Gas (LNG) facilities, in addition to the large sources identified in the 2021 Louisiana Greenhouse Gas Inventory. Those facilities located in the State's coastal zone are required to obtain a Coastal Use Permit (CUP), which generally focuses on wetland and water impacts, while the GHG emissions from all facilities in the state contribute to the global trends of sea-level rise, extreme weather events, etc. Those trends are in turn contributing to increased risk both in the coastal zone and across the state, and are colliding with infrastructure decisions such as development of high-risk flood zones. The Louisiana Watershed Initiative (WSI), also highlighted in the Draft 2023 CMP, was created in response to the 2016 flood event, and provides an important policy tool for controlling development of flood zones that increases damage and risk for residents of the coastal zone and watersheds across the state. There are additional policy tools and resources that can be applied for cooperative agreements and incentives in combination with the WSI, such as the Louisiana Outdoors Forever Program. Another intersection of the permit process with coastal issues is the area of water pollution, where the Department of Environmental Quality administers the Louisiana Pollutant Discharge Elimination System (LPDES) of permits. The Mississippi River is a major recipient of industrial and municipal discharge, the impacts of which are somewhat offset in the river channel by its large flow volume, but pollution loads can have impacts further downstream in the Gulf of Mexico, where point and non-point source nutrient loading fuels the annual Hypoxic Zone of low-oxygen, which forms for longer duration in some years now. The Environmental Integrity Project (EIP) an assessment in January of this year showing that Louisiana hosted eight of the refineries with the highest toxic pollutant and wastewater discharges in the U.S., several of which are sited on the Mississippi River. A related long-standing issue of concern which LEAN has raised in the past is the number of abandoned waste sites and wells in the coastal zone which are at heightened risk for inundation from hurricanes and sea level rise. Our work with vulnerable communities impacted by air, land, and water pollution, extreme weather and flooding, and other risk factors, has shown us how residents are being currently affected by these trends. Our main suggestion for the 2023 Draft CMP. therefore, would be to expand the coordination and integration of the coastal restoration program with

the Louisiana Climate Plan and Watershed Initiative, and especially with air and water permit decisions so that administrative and policy decisions are not taking place in separate silos. Such integration would contribute significantly to the sustainability of the coast and the State as a whole. Sincerely, Marylee Orr  
Director Louisiana Environmental Action Network/Lower Mississippi Riverkeeper  
P.O. Box 66323  
Baton Rouge, LA 70896  
The Louisiana Environmental Action Network works to foster cooperation and communication between individual citizens and corporate and government organizations to assess and address environmental problems in Louisiana. The mission of the Lower Mississippi Riverkeeper (LMRK) is to protect, preserve and restore the ecological integrity of the Mississippi River Basin for current users and future generations through advocacy and citizen action. The LMRK is a member of the Waterkeeper Alliance and is a project of the Louisiana Environmental Action Network.