



**Board of Directors**

February 20, 2024

Kimberly Reyher  
**Executive Director**

Dear Secretary Gray,

Parker Kilgore  
**Chairman**

We are writing in response to the Landry administration's request for public comment on [JML-13](#), "an initiative to review and consider optimizing various offices, agencies, and authorities" within the Department of Energy and Natural Resources, including, potentially, the state's Coastal Protection and Restoration Authority.

Ashley Liuzza  
**Vice Chair**

Nene Gianfala  
**Treasurer**

The Coalition to Restore Coastal Louisiana, which was incorporated 36 years ago, played a foundational role in the state's coastal program. CRCL's mission is to unite people in action to achieve a thriving, sustainable Louisiana coast for all. More than 2,300 people volunteered with our organization in 2023, and we reached more than 4,000 others through our advocacy and outreach events. Through our board of directors, Coastal Advisory Council, volunteers and thousands of other supporters, we represent a diverse set of interests across our state.

Will Norman  
**Secretary**

Mindy Nunez Airhart  
Donald Brinkman  
Steve Chustz  
Rob Gardiner  
Sarah Giles  
Brendan Hughes  
Devyani Kar  
Heather Layrisson  
Terrence Lockett  
Sam Miles  
Brock Piglia  
John Ross  
Randy Smith  
Kristian Sonnier  
Beau Tate

Our organization believes consolidating the Coastal Protection and Restoration Authority with the Department of Energy and Natural Resources would not help our state address coastal land loss. CPRA remaining an independent agency that reports directly to the governor ensures its effectiveness and sense of urgency are maintained. The CPRA is a global leader in establishing how coastal protection and restoration are conducted. Placing it within another agency would create additional bureaucracy and may slow project implementation. It would also send the wrong message to coastal communities.

In the influential 1989 paper "Here Today and Gone Tomorrow?", CRCL called for the creation of an independent office of coastal restoration that is accountable solely to the governor, the Legislature and the public, writing:

*This office should combine coastal management, regulatory and restoration functions. ... All existing coastal programs should be transferred to this office. We are therefore not proposing another bureaucratic layer but centralization of all coastal resource operations in this office.*

More than 15 years later, after Hurricanes Katrina and Rita, that office came into being with the creation of the CPRA. The agency has become among the most effective in our state and recognized as a leader around the world, one that has based its decision-making on science. Having its leadership at the governor's office level has been a crucial component of efficient implementation of projects in the short term and is also important to longer-term planning and emergency response.

The CPRA is operating at a record level, with more projects in progress than ever before, and with the largest coastal restoration project in U.S. history finally under construction after decades of planning. Louisiana is making progress in building new land and correcting the fundamental causes of land loss, in large part due to CPRA's independence from other state agencies. Folding the CPRA into DENR runs the risk of slowing this momentum, potentially making the state's work to save coastal wetlands before they disappear *less* efficient.

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There is widespread public support for the coastal program as it now exists, both from the people of Louisiana and from the Legislature. This can be seen in the [independent polling](#) of voters, with more than 90% of them supporting science-based action, and in the unanimous or near-unanimous support for the state's Coastal Master Plan and Annual Plans in recent years. That restoration projects are creating thousands of good-paying jobs is undoubtedly a key component of this support.

We understand that there are inefficiencies in state government and areas in which agencies have competing interests. We recognize that JML-13 was issued to address these issues. However, the CPRA has been a major success story for our state. We are concerned that consolidating the CPRA with DENR without careful study may cause unintended consequences that impede the implementation of restoration projects and threaten funding. For instance, the CPRA has many contractual agreements with parties such as the Army Corps of Engineers, the RESTORE Council and landowners across the state as the "single state authority" on coastal projects. Restructuring the CPRA could require the renegotiation of these contracts and other agreements, which could jeopardize project implementation and the state's credibility with partners.

While we recognize that change is inevitable, we think it's important to ask why this change is being proposed. What problem is it seeking to solve? If any changes are to be made, we believe they should *accelerate* the momentum of coastal restoration along our coast, not potentially slow it. With every delay, we lose more land.

We also consider public input critical to this process and hope that it is adequately considered before a decision is made. Public support for coastal restoration has been a driving factor in the successes we are seeing. Communities are invested and engaged in the work. Their input must be considered.

The bottom line is that the restoration of our coast is too important to enact swift changes such as this proposed consolidation.

We look forward to the specifics of the Feb. 23 report on the proposed consolidation. At this juncture, we urge the administration to maintain the CPRA as a separate agency, ensuring that project timelines are not extended and that the coastal program remains a top priority within the governor's office.

We appreciate the opportunity to provide comments, and we look forward to working with you to protect our residents and our coastal resources.

Sincerely,

Kimberly Davis Reyher  
Executive Director

Parker Kilgore  
Board Chairman