# The Louisiana Coastal Area Study:
## A Case Study in Interagency Coordination

In February 2017, ELI released a background paper on "Fast-Tracking 'Good' Restoration Projects in the Gulf of Mexico," which focused on mechanisms that are available to fast-track restoration projects that are subject to federal environmental compliance requirements. In that paper, we noted that environmental compliance often requires the participation of several government agencies – federal, state, and local – and that the efficiency of compliance procedures can be improved by early, effective coordination among the various agencies. Below is a case study from Louisiana, where the co-location of staff from multiple agencies in a single office helped coordinate these agencies as they worked together to plan a suite of restoration projects along Louisiana's coast. This co-location aided efficient development of a Programmatic Environmental Impact Statement, which was then used as a basis for the rapid production of six tiered, project-specific Environmental Impact Statements.

The Louisiana Coastal Area Ecosystems Restoration Study ("LCA Study") was a report crafted by state and federal agencies that "identif[ied] a comprehensive coastal wetland restoration program in the state of Louisiana."[1] The LCA Study's origins began in 1998 with the drafting of the Coast 2050 Plan,[2] a long-term, extensive plan to use "watershed management" and "watershed structural repair" to restore accumulated damage to Louisiana's coastal ecosystem.[3] Based on the Coast 2050 Plan and a subsequent "reconnaissance report" that "expressed a Federal interest in proceeding to the feasibility phase,"[4] an interagency team known as the Louisiana Coastal Area Project Delivery Team

Photo by ELI Gulf Team.

[1] LOUISIANA COASTAL AREA STUDY, FREQUENTLY ASKED QUESTIONS (Jan. 2003), available at: https://www.lca.gov/Library/ProductList.aspx?ProdType=0&folder=1367 (last accessed Sept. 13, 2018).

[2] *See* U.S. ARMY CORPS OF ENGINEERS ET AL., ECOSYSTEM RESTORATION STUDY: FINAL PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT, at *S-ii* (2004), available at: https://www.lca.gov/Library/ProductList.aspx?ProdType=0&folder=1126 (last accessed Sept. 13, 2018) (hereinafter LCA FPEIS) (noting relationship between Coast 2050 and FPEIS).

[3] LOUISIANA COASTAL WETLANDS CONSERVATION AND RESTORATION TASK FORCE & WETLANDS CONSERVATION AND RESTORATION AUTHORITY, COAST 2050: TOWARD A SUSTAINABLE COASTAL LOUISIANA, AN EXECUTIVE SUMMARY, 5 (1998), available at: https://web.archive.org/web/20160403213636/http://coast2050.gov/products/docs/orig/2050execsumm.pdf (last accessed Apr. 13, 2018)

[4] U.S. ARMY CORPS OF ENGINEERS ET AL., ECOSYSTEM RESTORATION STUDY: LCA STUDY – MAIN REPORT, at Attachment 2-2 (2004) (hereinafter LCA STUDY MAIN REPORT), available at: https://www.lca.gov/Library/ProductList.aspx?ProdType=0&folder=1125 (last accessed Sept. 13, 2018).

("LCA Team") was assembled to expand on these earlier planning efforts.[5]

Photo by ELI Gulf Team.

The LCA Team's work evolved into the LCA Study, which was undertaken to "[i]dentify the most critical human and natural ecological needs of the coastal area; [p]resent and evaluate conceptual alternatives for meeting the most critical needs;"[6] and, ultimately, to recommend a near-term plan, known as the LCA Plan, to be submitted by the United States Army Corps of Engineers ("USACE") to Congress for authorization under the Water Resources Development Act.[7] The LCA Plan identifies a set of specific restoration projects that could be implemented within 5-10 years, and also includes certain programmatic and longer-term recommendations.[8] As part of the LCA Study, the LCA Team was tasked with drafting a Programmatic Environmental Impact Statement ("PEIS") for the LCA Plan, to evaluate its environmental impacts and analyze alternative courses of action in accordance with the National Environmental Policy Act.[9]

The LCA Team was made up of staff from six federal agencies and the State of Louisiana's Department of Natural Resources, researchers from academic institutions, and contractors.[10] The LCA Team was provided dedicated office space at the USACE office in New Orleans, so that staff from the different agencies could work together in one place.[11] Team members from five federal agencies – USACE, U.S. Fish and Wildlife Service, U.S. Environmental Protection Agency, U.S. Geological Survey, and Natural Resources Conservation Service – all worked there in person while the team conducted the study.[12] Team members from the state Department of Natural Resources used the dedicated office space frequently, but were permanently based in Baton Rouge; staff

[5] LCA STUDY MAIN REPORT at MR 1-2—3; *see id*. at i.
[6] *Id*.
[7] *See id*. at i, ii, v, viii, xii.
[8] *See id* at xi.
[9] *See* LCA FPEIS at *S-ii*; Notice of Intent to Prepare a Draft Programmatic Environmental Impact Statement for the Near-Term Ecosystem Restoration Plan for the Louisiana Coastal Area, 69 Fed. Reg. 18552 (Apr. 8, 2004), *available at:* https://www.federalregister.gov/documents/2004/04/08/04-7967/intent-to-prepare-a-draft-programmatic-environmental-impact-statement-for-the-near-term-ecosystem.
[10] LCA STUDY MAIN REPORT at MR 3-14; Telephone Interview with Timothy Axtman, U.S. Army Corps of Engineers – New Orleans District (Mar. 26, 2018). *See also* LCA STUDY MAIN REPORT at v.
[11] Telephone Interview with Timothy Axtman, *supra* note 10; *see also* LCA Study at MR 3-15.
[12] Telephone Interview with Timothy Axtman.

from the sixth federal agency, the National Marine Fisheries Service, worked from that agency's own office.[13]

The LCA Team's efficient process allowed the LCA Plan and associated PEIS to be completed in two years, and final Environmental Impact Statements (EISs) for six projects to be completed within two years.[14] A number of factors seemed to play a role in this efficiency. These included the Team members' co-location in New Orleans, which helped to:

- **Facilitate compromise.** Even while serving as part of the LCA Team, each agency was operating within its own statutory directive; and at times, the Team members had different perspectives about how best to meet the LCA Study's overall objective of creating more marsh footprint.[15] Having staff located in one place helped the Team address differences in agencies' opinions more efficiently.[16] In addition to saving time that would have been required to exchange emails and phone calls, the ability of staff from the different agencies to discuss potential projects and ask each other questions in person allowed them to build relationships that made it easier to work through their differences.[17]

- **Make communication among agencies more efficient.** Co-location facilitated more efficient communications among the agencies involved in the planning effort, at multiple levels.[18] For example, during the brainstorming phase, having staff with a range of technical expertise work together in person allowed Team members to provide each other with quick responses to project ideas, including giving early input on projects' technical development from the other agencies' perspectives.[19]

Photo by ELI Gulf Team.

[13] *Id*.

[14] Telephone Interview with Timothy Axtman. The six projects were: Multi-purpose operation of the Houma Navigation Canal Lock; Convey Atchafalaya River water to northern Terrebonne marshes; Terrebonne Basin barrier shoreline restoration; Small diversion at Convent/Blind River; Increase Amite River Diversion Canal influence by gapping banks; and Medium diversion at White's Ditch. *See generally* U.S. Army Corps of Engineers, LOUISIANA COASTAL AREA, LOUISIANA, ECOSYSTEM RESTORATION, SIX PROJECTS AUTHORIZED BY SECTION 7006(E}(3) OF WATER RESOURCES DEVELOPMENT ACT OF 2007(Dec. 2010), available at: https://www.lca.gov/Library/ProductList.aspx?ProdType=0&folder=0.

[15] Telephone Interview with Timothy Axtman.

[16] *Id*.

[17] *Id*.

[18] *Id*.

[19] *Id.*

The co-location also helped facilitate more efficient interagency discussions at higher levels, such as when a question or issue arose that required a coordinated response from top officials at multiple agencies.[20]

- **Foster interagency relationships.** While working on the LCA Study, staff members from different agencies had frequent in-person contact that allowed them to build relationships.[21] In addition to making development of the LCA Plan more efficient, these relationships made it easier to coordinate between the agencies for other purposes, such as coordination between regulatory staff during environmental compliance.[22]

Aside from co-location, there were also a number of other factors that likely facilitated efficient development of the LCA Plan and environmental review documents. This included Congressional support for restoration projects in the Gulf.[23] At the same time, the high volume of federal projects in the region meant that the staffs of federal agencies were large enough, and the funding sufficient, to allow for the relocation of individual staff members.[24] In addition, state and federal agencies had a long history of working together to mitigate coastal land loss and plan restoration projects in the region, including but not limited to their collaboration on the Coast 2050 Plan.[25]

[20] *Id.*
[21] *Id*.
[22] *Id*.
[23] *See, e.g.,* 16 U.S.C. 3951–3956 (2017).
[24] Telephone Interview with Timothy Axtman.
[25] *Id*.; *see generally* LCA STUDY MAIN REPORT at Attachment 2.