

**BAYOU CULTURE COLLABORATIVE STATEMENT
ON THE DRAFT 2023 LOUISIANA COASTAL MASTER PLAN
March 15, 2023**

The Draft 2023 Louisiana Coastal Master Plan (CMP) invokes the state’s “rich histories, culture, ecosystems, and natural resources” as attributes worthy of preservation (page 2). Yet the very richness of coastal histories and cultures is largely absent from this broad-scale planning document and the metrics that benchmark its vision of coastal restoration. Like the plan’s previous editions, the 2023 CMP relies on data that are quantitative, abstract, and scalable. Predicted flood depths, square miles of land loss, and estimated future costs fill its pages, effectively conveying the seriousness that we should accord to the combined threats of coastal subsidence and sea level rise, yet omitting any sense of these crises’ human dimensions beyond broad statements like the one quoted above.

We are writing on behalf of the Bayou Culture Collaborative (BCC), a coalition of nearly 700 Louisiana tradition-bearers, environmental and social scientists, and residents organized through the Louisiana Folklore Society to amplify historically underrepresented perspectives in planning. In 2022 we published a [position statement](#) that outlines our vision of inclusive coastal restoration and adaptation. Looking at the draft Coastal Master Plan, BCC urges CPRA to, building on its long experience of working with coastal communities, make greater strides to seriously take into account coastal communities’ lived experiences. Coastal residents, especially those who have historically been marginalized from the benefits of water management infrastructures, are adaptation experts. This expertise is the product of ecological relationships that are themselves worthy of protection. We firmly believe that these knowledges and practices must be at the forefront of present and future efforts to plan Louisiana’s coast.

We understand that CPRA considers the Master Plan to be scientific, and that this framing is essential for satisfying the agency’s legislative mandate. However, we push back on the assumption that incorporating qualitative data and social analyses, and centering community in the planning process, hurts its legitimacy and credibility. Much robust research complicates the notion that a purely “objective” plan is possible. There are always values imbued in planning processes, and we, as well as a critical mass of experts on climate adaptation and environmental and climate justice, point out that obscuring these values does just the opposite. Having a plan that is blind to the history of how governing institutions, special interests, and legal regimes have exacerbated environmental crises in the past is vulnerable to repeating these patterns and driving division that blocks progress.

We urge CPRA to formally adopt a historically-informed perspective on coastal land rights. For example, the federal Swamp Lands Acts of 1849-1876 allowed Louisiana to sell over 8.5 million acres of appropriated federal lands to white homesteaders, timber companies, and industrial interests, in part to finance state land reclamation and water management infrastructure projects, intended to drain swamplands and put to beneficial use. This process ignored the rights of the Indigenous communities who lived in these areas with unrestricted access to fish, hunt, trap, and plant. These land sales have had deleterious impacts on coastal ecosystems and Indigenous communities—repair from which must be at the center of planning efforts moving forward. Or take Louisiana’s oyster leasing system, from which the state has recently streamlined the process for buying out longtime participants. Since 1902 this system has guaranteed exclusive harvesting rights on public water bottoms for a disproportionately white-owned commercial fishing enterprise. While the sustainability of this industry and the livelihoods of these fishermen is certainly a concern, we contend that it is simply not enough to debate the future of an exclusionary leasing system or of water bodies that have historically been its jurisdiction: subsistence harvesting and other non-regulated fishing practices must also be considered among the impacts of structural interventions.

CPRA has taken steps in the past to include coastal community knowledges in its data production. The agency sponsored research in 2012 to represent coastal residents’ ecological knowledges on GIS maps. This “Sci-TEK” process incorporated community-engaged participatory research practices and robust qualitative data collection to produce an array of spatial representations depicting the experiences, priorities, and concerns of Louisiana’s coastal communities. More recently, CPRA funded “participatory modeling” in Saint Bernard Parish to connect local knowledge and experiences with computer-driven models that tend to eschew these perspectives. Yet these data were never incorporated into any iteration of the Coastal Master Plan. In addition, the current draft includes less-nuanced metrics for social vulnerability than previous editions, a move that we see as going in the wrong direction. We believe that Sci-TEK and Participatory Modeling represent steps in the right direction for CPRA and would like to see this kind of engagement revived and brought to a central place in the planning process.

Some metrics have been updated for the proposed plan in laudable ways. For example, instead of relying exclusively on dollar value to estimate real estate damage, this version also considers the number of homes impacted. This shift reflects CPRA's institutional awareness that major landholding entities are not the only stakeholders that matter, and that a simple cost-benefit analysis is insufficient and unjust. We also understand that the current plan incorporates Louisiana State Historic Preservation Office (SHPO) data to identify culturally important sites at risk of inundation. Yet both of these metrics hide long histories of erasure and dispossession disproportionately borne by Black and Indigenous coastal communities by relying on state records that, in the case of these communities, have often been destroyed or never existed. They also miss the dynamic relationships among people, cultural sites, and ecosystems that constitute life on the coast. We instead point to the crucial work taking place in communities across Louisiana to uncover these hidden connections by identifying lost cemeteries, restoring suppressed languages, and recovering land-based practices as sites where CPRA's efforts could do the most work ameliorating centuries of "land loss" more broadly construed.

CPRA was established by the state of Louisiana to implement "efforts to achieve comprehensive coastal protection" (La. R.S. 49:214.1). We contend that the agency's fulfillment of this directive would be made much stronger through including coastal communities from the beginning and by paying close attention to peoples' connection, sense of belonging, and attachment to their place. As such, the Coastal Master Plan must provide a clear plan to expand and fund local, non-structural projects in close collaboration with communities. We outline some principles and action steps towards this inclusive approach in our position statement, which can be accessed at <https://www.louisianafolklore.org/?page_id=1215>. Additionally,

- CPRA should place a greater emphasis on protecting cultural sites and traditional landscapes. One way to do this would be to index community-submitted sites on a GIS database hosted by a third party. Two examples of potential hosts include the Lowlander Center and South Louisiana Wetlands Discovery Center.
- Programmatic additions explicitly aimed at cultural resources are needed.
- Facilitate and incorporate habitat migration planning to maintain traditional landscapes (both land and water) for uses that are integral to cultural preservation.
 - CPRA's Coastal Forest Conservation Initiative should be revived with a special emphasis on preservation and facilitation of habitat migration corridors.
 - CPRA should work with coastal communities on strategic conservation mapping for resilience planning using tools and resources developed by the Gulf of Mexico Alliance and The Nature Conservancy.
 - Projects that facilitate habitat migration via plantings, dedicated dredging, or nourishment should be included in future plans or programs.
 - Barriers to habitat migration should be avoided or minimized, especially when planning infrastructure in key habitat migration corridors.
- The process for selecting and sequencing future projects should formally recognize and incorporate coastal communities' place-based needs and visions.
- Community engagement should begin before any other aspect of the planning process, and should be rooted in a trauma-sensitive approach to recognizing and healing from coastal communities' long-standing experiences of dispossession. Some relevant resources are available through the ClimiMigration Network at www.climigration.org.
- Future plans should incorporate data connecting environmental change, trauma, and physical health impacts, and should include provision of appropriate health services.
- Incorporate federal climate and environmental justice directives, such as Justice40 and executive orders 13990 "Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis" and 14008 "Tackling the Climate Crisis At Home and Abroad."
- CPRA should build capacity for coastal residents to lead every aspect of future planning.
 - Invest in programs to train coastal Louisianans to fill existing roles within CPRA.
 - Expand roles for social scientists within the agency to facilitate participatory research with coastal community groups.
 - Support training of coastal residents as community liaisons to increase dialogue between residents and coastal scientists throughout the planning process.
 - Develop trauma-sensitive communication practices as foundational for outreach and engagement.