

1430 Highway 75  
Sunshine, Louisiana 70780  
September 18, 2023

Mr. Robert "Bobby" Lott  
Assistant Environmental Engineer Administrator  
Louisiana DOTD Office of Engineering Environmental Section  
P.O. Box 94245  
Baton Rouge, Louisiana 70804

Dear Mr. Lott,

This letter is in reference to the Property Access Approval Form you sent to Pauline L. Becnel & others, Iberville Parish Parcel 0400538300, for Project MRB South GBR: LA 1 to LA 30. My wife and I are part land owners of this parcel.

I am opposed to Route E-11-IV. It would cut through the land that I have been hunting on since I was twelve years old. The Wildlife Diversity Division of Louisiana Department of Wildlife and Fisheries (LDWF) surveyed the land for the A. E. LeBlanc Forest Natural Area agreement that is located on this parcel, and one of the results was the species list. This list gets longer every time I go out in the woods, because each time I am reminded of another species that wasn't on the original list. I've no doubt the list should have twice as many species on it, and will eventually, as we take the time to identify and record the various species. The current species list is attached to this letter.

This land that I live on and the A. E. LeBlanc Woods that I hunt in are in the area known as Plaquemine Point (that has nothing to do with the town across the river named Plaquemine), which will be impacted by bridge option E-11-IV. There are adjacent woods behind the houses of all the people who live along the river road, the entire way around Plaquemine point, making the woods behind our homes one continuous habitat for wildlife. Animals on this land have a limited amount of woods to live in, and they exist in this protected area in a sort-of refuge. The hunters who have traditionally hunted this land have been good managers of the animal population. The Wildlife and Fisheries personnel who conducted the Natural Area survey noted a healthy ecosystem based on deer browse observations and the presence of small cypress saplings not eaten by deer nor by other species. If a bridge comes through here, it will destroy the wildlife habitat. The problem is, the animals cannot just move to another patch of woods somewhere else, because they are isolated, cut-off on three sides by the river and on one side by industry on the cut-off road Hwy 327. Obliterating this habitat by building a bridge here would be an end to this animal population and the generations-deep tradition of responsible hunting by the people in Plaquemine Point.

It should be noted that seventeen out of hundreds of old cypress trees on our land and on the Ellison and Cox land were cored by The Louisiana Purchase Cypress Legacy Organization. The age of the oldest cypress tree cored is estimated as 330 - 360 years old. I know for a fact that there are trees in these woods that are bigger, and probably even older, but they just happened to not be in the sampling of trees that Louisiana

Cypress Legacy picked for the study. It seems that some have forgotten that the Louisiana State Tree is the Bald Cypress, and these trees were here *before* Louisiana became a state. Attached are the coring results from three field visits of the LeBlanc, Cox, and Ellison property performed by the Louisiana Purchase Cypress Legacy. Once this land is bull-dozed for the bridge, these trees cannot be replaced, and the land will never be re-forested because it will be a highway right of way.

As part of an ongoing Louisiana Cypress Forest Research Project, Dr. Linda Bui's graduate and under-graduate students in the LSU Department of Environmental Sciences studied the A. E. LeBlanc Forest to determine if it is regenerating or suffering the same fate as many other cypress forests adjacent to highways – those that contain standing dead trees and have no new growth, known as ghost forests. The research project group measured 74 cypress trees over the course of three field visits and determined that the forest is indeed regenerating, with cypress trees of various sizes. This finding corroborates the LDWF Wildlife Diversity Division Natural Area finding that the forest is healthy and intact. Attached is the research project summary. The destruction of cypress forests caused by bridges and highways is evident by the ghost forests at the 310 exit off I-10 and by the St. Francisville Mississippi river bridge. If E-11-IV is built, that same thing will happen here to the land *outside of* the 600 ft wide path. In fact, the impact to the land *outside of* the eminent domain, after the 600 ft wide path changes the water flow, absorption, and retention, should be considered during your environmental study. The fact that this forest is regenerating should be a critical environmental factor when comparing the quality of this land to the many other options for the bridge.

Lastly, several neighboring Ellison property tracts, which are different from the Ellison land containing the old-growth cypress trees, are being used for Wetland Mitigation Credits. Bridge Option E-11-IV passes right through that property (attached map). Bridge option E-11-IV directly conflicts with the principle of the Wetland Mitigation Banking Program, which is finding suitable wetlands to set aside to compensate for the destruction of another property. Any possible way that DOTD finds to deal with this would undermine the integrity of the Wetlands Mitigation Banking model, which is meant to have the land owner agree to set aside and preserve the wetlands into perpetuity, so that it too might become regenerating forest one day.

I feel these are sufficient environmental reasons to locate the bridge through another route.

Sincerely,

Cliff Comeaux

1430 Highway 75  
Sunshine, Louisiana 70780  
September 11, 2023

Mr. Robert "Bobby" Lott  
Assistant Environmental Engineer Administrator  
Louisiana DOTD Office of Engineering Environmental Section  
P.O. Box 94245  
Baton Rouge, Louisiana 70804

Dear Mr. Lott,

This letter is in reference to the Property Access Approval Form you sent to Pauline L. Becnel & others, Iberville Parish Parcel 0400538300, for Project MRB South GBR: LA 1 to LA 30. I am one of the land owners of this parcel.

Attached is the Iberville Parish Assessor's map showing the location of the parcel, as well as the general and specific locations of the A. E. LeBlanc Forest Natural Area / National Old-Growth Forest / Louisiana Purchase Cypress Legacy Forest that is on this parcel. The land shown on the Natural Area map has old-growth trees 220 - 360 years old that were alive at the time of the Louisiana Purchase in 1803. The Natural Area maps represent the collective conservation efforts of Louisiana Department of Wildlife and Fisheries (attached agreement, sign, and certificate), the National Old-Growth Forest Network, the Louisiana Purchase Cypress Legacy Organization, and Louisiana State University Environmental Sciences Department Regenerating Cypress Forest Research Project.

We have extended three invitations to DOTD and Atlas to come visit the property - October 2022, February 2023, and March 2023 (invitations attached to this letter) - but have had no one contact us to see the property. The reason we responded to the Property Access Approval Form as "we are allowing entry onto the property, under protest", is because we are expressing our concern that you are going to potentially damage this property that we tried to get your department to visit much earlier in the process with the hope that you would acknowledge the significant environmental and cultural impact before beginning the official Environmental Assessment. Of the 32 bridge options, many viable alternatives could have still been considered at that time. On March 27, 2023 at the Capital Area Road and Bridge District meeting, I was told by Chairman Campbell that my environmental public comments were premature. At that same March 2023 meeting, the Atlas representatives described how they had already completed multiple site visits with several chemical corporation land owners. Therefore, on that day, I invited them again to our property, to no avail. If my public comments were premature, then when would be the right time to vocally give comments about the environmental impact? Your next meeting coming up in September 2023 is closed to the public. This makes our family question the sincerity of the Louisiana DOTD public comment process and wonder why the chemical corporation

land owners' concerns were heard ahead of time, but not those of the non-commercial land owners. After the March 2023 bridge meeting, I told the Atlas representatives that an Environmental Impact Statement (EIS) would surely be needed for the E-11-IV bridge pathway because of the old-growth cypress forests and cultural significance on ours and the Cox and Ellison tracts. The Atlas representatives told me that if an EIS is needed, an extra year of study would be added to the schedule for a total of two years. Shortly after the March 2023 meeting, the public announcement stated that a decision on the bridge would be made in 2024, which was contrary to the 2-year timeline the Atlas representatives told me would be needed if an EIS is required. This makes our family concerned about the legitimacy of the Environmental Assessment process.

The U.S. Department of Agriculture (USDA) will invest more than \$48.6 million this year through the combined efforts of that agency's U.S. Forest Service and U.S. Natural Resources Conservation Service for projects on public and private land that mitigate wildfire risk, improve water quality, restore forest ecosystems, and ultimately contribute to USDA's efforts to combat climate change. Louisiana should take advantage of our *existing* old-growth forests that do not require millions to restore. Louisiana should be building smart infrastructure that uses land already cleared rather than tearing down forests, particularly old-growth forests. The Louisiana DOTD chose the potential bridge routes by looking at Google Earth photography. In Google Earth, all forest looks the same. However, a 25-year-old forest is not capturing nearly as much carbon as an old-growth forest such as the A.E. LeBlanc Forest Natural Area and Old-Growth Cypress Forest.

Governor Edwards' Climate Initiatives Task Force has issued the Louisiana Climate Action Plan which recognizes that Louisiana's forested areas "are a considerable carbon sink" and their conservation will be critical in Louisiana's net zero greenhouse gas target. The action plan states that natural lands and wetlands are much more than a carbon sink - they are part of the state's cultural heritage. Climate Action Plan Strategy 14.1 states "*In particular, preservation and active stewardship of unmanaged, old-growth forested lands and of native or semi-native grasslands, savannas, and woodlands offer a great opportunity for carbon sequestration and better land management in Louisiana. Priority areas should be preserved through voluntary expansion of conservation servitudes and other conservation tools in partnership with landowners, land trusts, conservation organizations, Louisiana Department of Agriculture and Forestry (LDAF), Louisiana Department of Wildlife and Fisheries (LDWF), and local government.*" There are so many forest protection initiatives at the state and national level, that it should strike every one of us as ironic that at this stage of climate warming, one arm of our state is planting trees while the other arm is considering cutting down forests when other alternatives exist.

This "back-yard" forest in Sunshine is of cultural significance to the descendants of the Acadian settlers who were exiles forced to come here. The people in this community have been hunting on the backs of their properties for centuries. Several families like ours have not taken timber during the last hundred years to keep the woods a secure

habitat for wildlife. These old cypress trees were standing when our Acadian ancestors settled in Sunshine and St. Gabriel in 1767 after being exiled by the British from their own land in Acadia (known today as Nova Scotia). Twelve years later in 1779, these same Acadians joined the Spanish General Bernardo de Galvez, who as Governor of Louisiana, helped the Americans fight the Revolutionary War against the British. He and his army passed on foot through this land impacted by E-11-IV in the historic fight against the British at nearby Fort Bute at Manchac. At that time, Fort San Gabriel was one of only 3 Spanish posts on the Mississippi River above New Orleans (along with Pointe Coupee and Fort San Luis de Natchez) and was key to the protection of navigation on the Mississippi river to and from New Orleans. Fort San Gabriel was on the opposite bank of Bayou Manchac from British Fort Bute – Bayou Manchac being the international border between Spain and Britain. Our Acadian ancestors fought with the Spanish forces against the British. Attached is the ~1769 map (Plan des Etablissemens de Sa Maje. Catholique ala Riviere D'hiberville, Biblioteca Nacional de Espana, photocopy on deposit at Louisiana State Archives) that shows how E-11-IV would dissect this settlement and in particular, shows the dissection of the historical Grand Chemin - the main road from Fort San Gabriel all the way through the settlement known today as Sunshine. Also attached is the 1779 map and translations of Spanish military planning letters (Legajo 83-B and 112 of Papeles Procedentes de Cuba at Archivo General de Indias at Seville) concerning the protection of Fort San Gabriel and capture of British Fort Bute. The 1779 map (top of map is pointing South) also shows the potential dissection of the settlement by path E-11-IV. This map of military importance shows item "c", "fuerte San Gabriel" (Fort San Gabriel) and item "f", "habitacion de miguel - a tres leguas de distancia - del fuerte Sn Gabriel" (Michel's room/house - three leagues away from Fort San Gabriel) which was three leagues away from the fort and was a key location for the military planning. Habitacion de miguel is located on the very path of E-11-IV. Casa de Mr. Pedro Miguel (item "f" habitacion de miguel) is named as the location from which the attached letters were written in 1779 to General Galvez to report military activity on the Mississippi River. The rich cultural significance of this area should be investigated by anthropologists, not destroyed.

The Arbor Day Society and the Louisiana Climate Action Plan recognize the importance of Heritage Trees and Forested Land: *Arbor Day - The nature of heritage trees varies widely. Great size is easy to recognize and appreciate. Historical events associated with a tree also qualify it as a heritage tree; and Louisiana Climate Action Plan - Louisiana's abundant natural lands and wetlands are important not only for carbon sequestration, but also for maintaining cultural heritage.* Our cypress trees are heritage trees to this community. Two other neighbors, adjacent to our property - the Cox tract and two of the Ellison tracts - have Louisiana Purchase Cypress Legacy Trees (Alive in 1803) that are also in the pathway of bridge option E-11-IV. Attached is the Google Maps image of all tracts. Also attached is the Google Maps image of 135 large cypress tree GPS "pins" on the tracts of land owned by the three land owners mentioned (current as of 9/2023 - NOTE - more trees are identified with this method during each field visit).

As you can see, this area is unique and is quite important to the cultural heritage of Sunshine and St. Gabriel, as well as being vital to the federal and state governmental

forest preservation initiatives. The Louisiana DOTD list was narrowed to three by using a single criterium for plants - that being wetlands - which does not account for the importance of forested land. Please consider all these points when performing the Environmental Assessment.

Sincerely,

Laura Comeaux

(on behalf of the 16 land owners and over 100 living descendants of A.E. LeBlanc)

225-401-5214

September 8, 2023

Mr. Lott  
Louisiana DOTD  
Office of Engineering- Environmental Section  
P.O. Box 94245  
Baton Rouge, Louisiana 70804

Project No. H.013284 MRB South GBR: LA 1 to LA 30

I am writing to oppose the pathway E-11-IV for the new bridge. The pathway would negatively impact the **A.E. LeBlanc Legacy Cypress Forest** as designated by the Louisiana Purchase Cypress Legacy Organization. Many of the trees have been determined to be alive at the time of the Louisiana Purchase. Several have been determined to be even older than the 220 years since the Louisiana Purchase.

Our own State Law RS 3:4278.5 states  
*It shall be unlawful for any person or government entity, or his agent or employee, to cut, fell, destroy, remove or to divert for sale or use, any cypress trees growing or laying on public owned by or under the control of the state of Louisiana or local governing authority.* The proposed acquisition of the portion of the forest would obviously be against this law. How will this be addressed?

Another concern I have is the destruction of old growth forest land. The idea of mitigation of this type of forest is not realistic. Where can 200-300 year old trees be located to offset this property? Mitigation of wetlands do not equal the environmental impact of the size and age of these trees. **The A.E. LeBlanc Forest Natural Area** has been registered with the **Old Growth Forest Network** which states that only a few remnant old-growth forests exist in the U.S. Less than 1% remain in the East. In their publication *Wild Carbon and Wild Forests* it was stated that *Forests cannot store large amounts of carbon without large trees. Even large numbers of small and medium diameter trees could not equal the biomass in a few large diameter trees.*

Lastly, several proposed routes were dismissed without evaluating them for environmental impacts. There were several that did not involve destruction of forests or forested land. Why did this happen? I would appreciate your consideration to these concerns when doing your evaluation.

Sincerely,

Land Owner Iberville Property Parcel No. 0400538300

JOHN BEL EDWARDS  
GOVERNOR



ROBERT E. SHADOIN  
SECRETARY

PO BOX 98000 | BATON ROUGE LA | 70898

23 Oct 2023

Robert L. Lott  
Assist. Environmental Engineer Administrator  
LA DOTD  
P.O. Box 94245  
Baton Rouge, LA 70804-9245

Dear Mr. Lott,

Due to its significant ecological value, A.E. LeBlanc Natural Area was designated as an official Natural Area in 2022 by the State of Louisiana. This 60-acre property in Iberville Parish is owned and managed by the LeBlanc Family and is located within Township 08 South, Range 01 West, Section 13, and Township 09 South, Range 01 West, Section 04, in Sunshine, LA. The tract was recently identified as one of three locations for the proposed *Mississippi River Bridge South Greater Baton Rouge: LA 1 to LA 30 Connector* (H.013284) routes (HVII H19, H20, J21, K22). Should this site be within or adjacent to the final footprint of this project, irreversible harm would be caused to the ecological integrity of this at-risk wetland natural community and the species that utilize it.

The Natural Areas Registry Program was created by the Louisiana Legislature with the specific intent of conserving properties like A.E. LeBlanc Natural Area – areas that exemplify Louisiana natural communities and biodiversity. Enrollment in the Natural Areas Registry recognizes and honors the significant contributions of Louisiana landowners and the role they play in protecting and preserving our natural heritage through their voluntary stewardship. In this case, A.E. LeBlanc Natural Area was enrolled in the Natural Areas Registry due to the presence of old-growth Bottomland Hardwood Forests, which serve as vital habitat to the more than a dozen Species of Greatest Conservation Need (SGCN) documented from the site. This property is also registered with the Old Growth Forest Network and the Louisiana Purchase Cypress Legacy Organization due to the presence of 220 to 360-year-old cypress trees, which were alive at the time of the Louisiana Purchase in 1803.

Valuable ecosystem services are provided by A.E. LeBlanc Natural Area, including, but not limited to, floodwater storage, water filtration, storm protection, and carbon sequestration. Removal or impairment of those services would likely facilitate colonization of invasive plants and animals resulting in devastating impacts to surrounding communities. Disturbances to hydrology, soil, or

vegetation, as well as an increase in anthropogenic activity, on or near the property will degrade the area. When forests like this are cut for development, it can take hundreds of years for them to regrow to previous conditions, and, in many cases, these forests never fully recover the carbon storage and biodiversity they once had.

The Louisiana Department of Wildlife and Fisheries' Louisiana Natural Areas Registry Program respectfully requests the utilization of alternative project options to avoid impacts to A.E. LeBlanc Natural Area. Should you have any additional questions on the Louisiana Natural Areas Registry Program, please do not hesitate to contact me at [cdoffitt@wlf.la.gov](mailto:cdoffitt@wlf.la.gov) or 318-487-5325.

Respectfully,



Nicole Lorenz  
Biologist Program Manager  
Wildlife Diversity Program  
Louisiana Department of Wildlife & Fisheries  
2000 Quail Dr.  
Baton Rouge, LA 70808



# OLD-GROWTH FOREST NETWORK

*Connecting people with nature by creating a national network of protected, mature, native forests*

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oldgrowthforest.net  
info@oldgrowthforest.net

*Mr. Robert "Bobby" Lott  
Assistant Environmental Engineer Administrator  
Louisiana DOTD Office of Engineering Environmental Section  
P.O. Box 94245  
Baton Rouge, Louisiana 70804*

Dear Mr. Lott,

This letter is in reference to the A. E. LeBlanc Forest Natural Area that is part of Iberville Parish Parcel 0400538300. This letter is in opposition to route E-11-IV for Project MRB South GBR: LA 1 to LA 30.

We are writing to voice our concerns regarding the proposed route E-11-IV because it would negatively impact an historic forest that has been recognized within the Private Forest Registry of the Old-Growth Forest Network (OGFN). OGFN is a nonprofit organization working to connect people with nature by creating a national network of protected, publicly-accessible forests and a network of people to protect them. OGFN also educates about the extraordinary ecological and human wellness benefits of mature and old-growth forests, and speaks out regarding threats to important forests.

As proposed, route E-11-IV would impact the A.E. LeBlanc Forest Natural Area, which contains cypress trees aged 220-360 years old, with the potential for some to be much older. This forest represents both a cultural and natural heritage of ancient trees that are extremely rare across the country. Less than 1% of all historic old-growth forests remains in the eastern United States. Cypress trees are an especially important member of this group because of their extraordinary longevity; however, more than 90% of ancient bald cypress trees have been cut. In fact, the most recent issue of National Geographic profiled the discovery of Southeastern bald cypress trees more than 2,500 years old and warned of the threat to these trees from climate change, logging, salt water intrusion, and development. Cypress forests are also crucially important to our future, with groups such as the Pontchartrain Conservancy planting bald cypresses as future hurricane buffers for Louisiana. Why would we choose to also remove the ones that are protecting us right now?

As a mature forest with centuries-old trees, the A.E. LeBlanc forest contributes more to climate change mitigation than a younger forest would. Mature forests are important carbon sinks and land conversion involving deforestation is a well-documented source of greenhouse gas emissions contributing to climate change. The proposed route E-11-IV would increase potential climate impacts by degrading the A.E. LeBlanc Forest Natural Area and removing its ability to mitigate future climate impacts, such as flooding and hurricanes. In addition, Louisiana's Climate Action Plan



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specifically recognizes forests as considerable carbon sinks and places to maintain cultural heritage. The landowners of Iberville Parish Parcel 0400538300 and living descendants of A.E. LeBlanc have documented a rich cultural heritage tied to this forest.

It can take hundreds of years for forests to regrow to their previous conditions; even then, many logged areas can never recover the carbon storage and biodiversity they once had. We urge you to also consider the long term potential impacts of the proposed route beyond the limited life of transit infrastructure.

Sincerely,

Sarah Adloo  
Executive Director  
Old-Growth Forest Network

