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## Fishing Communities and Public Participation in Federal Decisionmaking: A Case Study of Community Opposition to the Mid-Barataria Sediment Diversion Project

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FISHING COMMUNITIES AND PUBLIC  
PARTICIPATION IN FEDERAL DECISION-  
MAKING: A CASE STUDY OF COMMUNITY  
OPPOSITION TO THE MID-BARATARIA  
SEDIMENT DIVERSION PROJECT

*Stephanie Otts\**

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## ABSTRACT

*In debates surrounding coastal restoration projects, the word “community” is heard frequently. Coastal restoration projects have the potential to affect a wide range of communities, both those which are place-based as well as communities of practice that are not geographically bound. However, the lack of a single, accepted definition of community can lead to faulty assumptions about who is being represented in policy debates which can undermine efforts to build consensus and support for coastal restoration efforts. This Article presents a case study of community conflicts and public participation surrounding a large, controversial coastal restoration project in Louisiana—the Mid-Barataria Sediment Diversion. The case study contrasting the special consideration granted fishing communities under federal law with the more common approach to public participation in federal decision-making—broad public notice and comment opportunities without any particular community focus. Federal fishery managers are mandated to take into consideration impacts to “fishing communities” when regulating fisheries, but there is little consensus on how that term is defined. Without consistent definitions and inclusion criteria, it is difficult to identify and assess impacts to fishing communities. This case study explores the differences between these two engagement approaches. Although the environmental review process for large coastal restoration projects does not implicate the fishing community analysis mandated by federal law, it could be a model for how to identify and mitigate impacts on affected communities in the future.*

## INTRODUCTION

In debates surrounding coastal restoration projects, the word “community” is heard frequently. Supporters of coastal restoration projects promote the benefits of the project to the community, while opponents focus on the potential harm to the community. In such debates, politicians, natural resource managers, advocacy groups, and members of the public often use the term “community” as if it is self-explanatory. The word, however, may be defined differently depending on the context. One person might use the word to refer to the town that they live in, whereas another person might be referring to a social or occupational network not necessarily defined by geography. The lack of a single, accepted definition of community can lead to faulty assumptions about who is being represented in policy debates which can undermine efforts to build consensus and support for coastal restoration efforts.

In 1955, George Hillery, a sociologist at Virginia Tech, identified almost ninety-four definitions of “community.”<sup>1</sup> Community is most commonly understood as a local geopolitical entity—a reference to the residents of a particular town, city, state, or region. The traditional view is that “communities exist only among people in a bounded geographic area.”<sup>2</sup> This type of community is often referred to as a “community of place.”

Community, however, can also refer to a group of people that do not live in the same place, but share common interests, values, or practices. These types of communities are everywhere and may be referred to as a community of interest, identity, or practice depending on the unifying force. People belong to all types of formal and informal groups as part of their professional and personal lives. Examples of communities of practice include groups of people with a “shared practice,” such as an artists’ collective, a professional network of surgeons, or game bird hunters.<sup>3</sup> Because they are not rooted in a particular geography, these

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1. George A. Hillery, Jr., *Definitions of Community: Areas of Agreement*, 20 RURAL SOCIO. 111, 112 (1955).

2. Ted K. Bradshaw, *The Post-Place Community: Contributions to the Debate About the Definition of Community*, 39 CMTY. DEV. 5, 5 (2008); see also Robert Ezra Park, *Human Ecology*, 42 AM. J. SOCIO. 1 (1936).

3. See generally, Etienne Wenger, *Communities of Practice: A Brief Introduction*, NAT’L SCI. FOUND. 2, 2 (2011), <https://scholarsbank.uoregon.edu/xmlui/bitstream/handle/1794/11736/A%20brief%20introduction%20to%20CoP.pdf?sequence=1&isAllowed=y>.

communities can be harder to define.<sup>4</sup> The internet and the growth of social media blur these definitions even more.

Coastal restoration projects have the potential to affect a wide range of communities, both those which are place-based as well as communities of practice that are not geographically bound. However, politicians, non-governmental organizations (NGOs), and individuals rarely say to which “community” they are referring to when engaging in policy debates regarding coastal restoration. It is often unclear exactly who is being represented.

Consider this statement by U.S. Representative Steve Scalise (LA) following the passage of the Water Resources Development Act by the U.S. Congress in December 2022: “[WRDA] will better prepare our communities for future storms and protect the lives and livelihoods of families and communities throughout Southeast Louisiana.”<sup>5</sup> Elected officials serve and represent the people living and voting within their districts, whether that is a city, county, state, or Congressional district. By the very nature of their jurisdictional boundaries, these districts encompass place-based communities. When a politician speaks of a community, it is natural for listeners to presume that they are talking about the people they represent; however, in the context of large restoration projects, the interests of a local mayor speaking on behalf of the residents of their town may be different from the interests of a state representative whose district includes that same town. Even when interests are place-based, they may conflict depending on how the individual speaking defines “community.”

NGOs, on the other hand, often represent communities of interest—the members and donors of the organization. NGOs focus their efforts on designing and implementing projects or advocating for causes or policy change on a national, or even international, scale. Many engage in lobbying and participate in public processes. Place-based communities, where such projects or policies are implemented, may be impacted differently even within the same geographic location. In any given policy debate, which communities are these NGOs advocating for? Is it their community of interest (e.g., individual members, donors, and groups they

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4. Chris Harrington et al., *Locating Communities in Natural Resource Management*, 10 J. ENV'T POL'Y & PLAN. 199, 205 (2008) (“Communities of interest might comprise formal and informal groups with common or shared interests, issues, aspirations, values or concerns which are spatially diffuse.”).

5. Press Release, Whip Steve Scalise, Fighting for Louisiana, Scalise Wins Key Flood and Hurricane Protections in WRDA, Congressman Steve Scalise (Dec. 8, 2022), <https://scalise.house.gov/press-releases/Fighting-for-Louisiana%2C-Scalise-Wins-Key-Flood-and-Hurricane-Protections-in-WRDA> [<https://perma.cc/6KBX-DF26>].

serve) or the place-based communities where the projects are located? If there are competing interests between their communities of interest and place-based communities, which definition do they adopt?

Communities of place and practice are not always unified in their goals. There are conflicts within individual communities<sup>6</sup> or among different communities sharing geographic space.<sup>7</sup> Failure to clearly convey which communities are represented in public debates about coastal resource use can increase these conflicts. Imprecise language regarding community representation can also contribute to the marginalization of historically underrepresented groups, whose views and perspectives may not be reflected in the discussions.

This Article examines how one particular type of community—fishing communities—has been singled out for special consideration under federal law in the context of fisheries management decisions. Next, this special consideration is contrasted with the more common approach to public participation in federal decision-making—broad public notice and comment opportunities without any particular community focus. Finally, the Article presents a case study of community conflicts and public participation surrounding a large, controversial coastal restoration project in Louisiana—the Mid-Barataria Sediment Diversion. This case study provides an opportunity to explore the differences between these two engagement approaches.

## I. FISHING COMMUNITIES

When undertaking certain actions or projects, a government agency may be required to consider the impacts of its decisions on a particular community. Such is the case with federal fisheries management decisions under the Magnuson-Stevens Act. The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson Act or MSA), enacted in 1976, is the principal law governing fisheries management in U.S. federal waters.<sup>8</sup> Under the MSA, Congress established eight regional Fishery Management Councils to work in partnership with the National

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6. Thomas E. Shriver & Dennis K. Kennedy, *Contested Environmental Hazards and Community Conflict Over Relocation*, 70 RURAL SOCIO. 491, 510-11 (2005); R. Arlinghaus, *Voluntary Catch-and-Release Can Generate Conflict Within the Recreational Angling Community: A Qualitative Case Study of Specialised Carp, Cyprinus carpio, Angling in Germany*, 14 FISHERIES MGMT. & ECOLOGY 161, 161 (2007).

7. Rachel Romero & Deborah A. Harris, *Who Speaks for (and Feeds) the Community? Competing Definitions of “Community” in the Austin, TX, Urban Farm Debate*, 18 CITY & CMTY. 1162, 1162 (2019).

8. 16 U.S.C. §§ 1801-1891.

Marine Fisheries Service (NMFS) within the National Oceanic and Atmospheric Administration (NOAA) to manage federal fisheries.<sup>9</sup>

The Fishery Management Councils are responsible for developing Fishery Management Plans (FMPs) for fish species in need of management.<sup>10</sup> The Councils are composed of federal, state, and territorial fishery management officials, participants in commercial and recreational fisheries, and other individuals with relevant experience.<sup>11</sup> Councils are guided in their development of FMPs and other actions by the advice of their respective Scientific and Statistical Committees (SSC) composed of leading scientists in biology, economics, statistics, and social science.<sup>12</sup> FMPs are not self-implementing, meaning that they do not become effective until the National Marine Fisheries Services publishes regulations to implement the Council's decisions.<sup>13</sup> Councils submit FMPs to NOAA for approval, and upon approval, NOAA issues regulations to implement the plans.<sup>14</sup>

FMPs developed by the councils must be consistent with ten national standards set forth by Congress in the MSA.<sup>15</sup> The National Standards set forth principles that must be followed to ensure sustainable and responsible fishery management. Conservation and management measures, for instance, must be designed to prevent overfishing and be based on the best scientific information available.<sup>16</sup> In 1996, when Congress reauthorized the MSA through the passage of the Sustainable Fisheries Act (SFA), it added National Standard 8 (NS8) which states:

Conservation and management measures shall, consistent with the conservation requirements of this chapter (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities by utilizing economic and social data that meet the requirements of paragraph (2), in order to (A) provide for the sustained participation of such communities, and (B) to the

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9. *Id.* § 1852.

10. *Id.* § 1852(g)(3)(A).

11. *Id.* §§ 1852(b)(1)-(2)(A), 1852(c).

12. *Id.* § 1852(g).

13. *Guide to Fishery Mgmt. Part 3: Creation of a Fishery Mgmt. Plan*, MISS.-ALA. SEA GRANT LEGAL PROGRAM (last visited Aug. 22, 2023), <https://masglp.olemiss.edu/fisherymanagement/part3/index.html> [<https://perma.cc/5TKQ-3NMS>].

14. *Id.*

15. 16 U.S.C. § 1851(a).

16. *See id.* § 1851(a)(1)-(2).

extent practicable, minimize adverse economic impacts on such communities.<sup>17</sup>

Since the enactment of NS8 in 1996, Fishery Management Councils have had an affirmative duty to consider the impact of their fishery management decisions on “fishing communities.” However, debate immediately arose around implementation of NS8 and continues today.<sup>18</sup> How exactly do policy-makers or managers define a fishing community? It is hard to answer this question because, while the term “fishing community” is widely used, it is quite difficult to define in practice because they are “seldom, if ever, discrete units.”<sup>19</sup>

A keyword search of state statutes and regulations in Westlaw for the term “fishing community” returned twenty-five results across a number of states. These references were predominantly in the context of establishing membership on advisory boards. For example, the Louisiana Governor’s Advisory Commission on Coastal Protection, Restoration and Conservation must include two members “to represent the fishing community, one of whom shall be from the commercial fishing industry and one of whom shall be from the recreational fishing community.”<sup>20</sup> No state provided a definition of “fishing community” to guide these board appointments.

Congress has provided a definition of fishing community for the narrow purpose of federal fisheries management under the MSA. The term “fishing community” in the MSA is a “community which is substantially dependent on or substantially engaged in the harvest or processing of fishery resources to meet social and economic needs, and includes fishing vessel owners, operators, and crew and United States fish processors that are based in such community.”<sup>21</sup> While the plain language of the definition does not expressly impose a geographic

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17. *Id.* § 1851(a)(8).

18. See generally Steve Jacob et al., *Landing a Definition of Fishing Dependent Communities: Potential Social Science Contributions to Meeting National Standard 8*, 26 FISHERIES 16 (2001); Patricia M. Clay & Julia Olson, *Defining “Fishing Communities”: Vulnerability and the Magnuson-Stevens Fishery Conservation and Management Act*, 15 HUMAN ECOLOGY REV. 143 (2008); Jamie Speed Rossiter et al., *Marine-Space Assemblages: Towards a Different Praxis of Fisheries Policy and Management*, 59 APPLIED GEOGRAPHY 142 (2015).

19. NOAA, NMFS-F/SPO-138, THE DESIGN AND USE OF FISHING COMMUNITY AND REGIONAL FISHERY ASSOCIATION ENTITIES IN LIMITED ACCESS PRIVILEGE PROGRAMS (2014).

20. LA. STAT. ANN. § 49:214.4.1(B)(1)(h) (2009).

21. 16 U.S.C. § 1802(17).



framework, the phrase “based in such community” signals that Congress was envisioning place-based fishing communities.

The legislative history of the SFA reveals that there were tensions between the House and Senate regarding this definition. The House version of the bill would have required FMPs to “take into account the historic participation of *local community-based fleets* and the *coastal communities which those fleets support*, and provide for the sustained participation of those fleets and communities.”<sup>22</sup> This language highlights that “the House was heading towards an even stronger embrace of place-based conceptualization of community.”<sup>23</sup> However, the House version did not provide a definition for “local community” or “coastal community.”

Several members of the House of Representatives voiced displeasure during floor debates with the Senate version of the SFA which was eventually passed by Congress. Representative George Miller (CA) argued that the Senate version defined fishing communities “far too broadly,” eliminating “important measures to protect small family fishermen.”<sup>24</sup> Representative Frank D. Riggs (CA) argued that the House bill gave consideration to “local, community-based fleets and protects the interests of the historic, generation after generation family fishermen,” a focus he claimed was obscured by the Senate’s version.<sup>25</sup> Finally, Representative Elizabeth Furse (OR) stated that

the Senate bill removes the safeguards for coastal communities, and those small coastal communities that are up and down my district are often economically dependent on the bounty of the fishery resource. They must be taken into account when fishery regulations are developed. I do not think this bill does that.<sup>26</sup>

Following the passage of the SFA, NOAA was responsible for implementing the statutory mandates enacted by Congress through the issuance of regulations.<sup>27</sup> This process is referred to as rulemaking. Through the rulemaking process, agencies set forth the technical and

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22. Reauthorization of and Amendments to the Magnuson Fishery Conservation and Management Act, H.R. 39, 104th Cong. § 9 (1995) (emphasis added).

23. Seth Macinko, *Fishing Communities as Special Places: The Promise and Problems of Place in Contemporary Fisheries Management*, 13 OCEAN & COASTAL L.J. 71, 85 (2007).

24. 142 CONG. REC. H11441 (1996) (statement of Rep. George Miller) (expressing his opposition to the Senate bill).

25. *Id.* at H11445 (statement of Rep. Frank D. Riggs).

26. *Id.* at H11443 (statement of Rep. Elizabeth Furse).

27. *See generally* 16 U.S.C. §§ 1854, 1855.

specific details needed to fully implement complex programs. Thus, NOAA regulations implementing the MSA also include a definition of “fishing community.” The agency definition, first adopted in 1998, expands on the Congressional definition by adding a geographic element.

The term “fishing community” means a community that is substantially dependent on or substantially engaged in the harvest or processing of fishery resources to meet social and economic needs, and includes fishing vessel owners, operators, and crew, and fish processors that are based in such communities. *A fishing community is a social or economic group whose members reside in a specific location* and share a common dependency on commercial, recreational, or subsistence fishing or on directly related fisheries-dependent services and industries (for example, boatyards, ice suppliers, tackle shops).<sup>28</sup>

This regulatory definition reinforces the place-based emphasis of both the House bill and the final SFA language. NOAA interpreted the final clause in the MSA definition—“based in such community”—as dictating a focus on place-based communities rather than on communities of interest or practice.

Since the MSA defines a fishing community as “based” in a geographic place, an occupational or avocational “community” of fishermen dispersed through a region or state cannot be considered a fishing community under the MSA. An avocational community, such as billfish anglers, is not linked to any one geographic place.<sup>29</sup>

The agency’s narrower geographic-based interpretation was affirmed by a federal district court.<sup>30</sup> The case arose out of a fishing industry challenge to NOAA National Marine Fisheries Service’s regulations setting the summer flounder fishery quota for the 1997 season.<sup>31</sup> Fisheries in the state of North Carolina faced a 50% reduction in their quota for the season.<sup>32</sup> Although the agency’s economic analysis found that 55% of North Carolina vessels would be impacted by a revenue loss of 5% or more, NMFS concluded that the regulations posed

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28. 50 C.F.R. § 600.345(b)(3) (2023) (emphasis added).

29. NOAA., NMFSI 01-111-02, GUIDANCE FOR SOCIAL IMPACT ASSESSMENT § 3.3 (2007).

30. North Carolina Fisheries Ass’n, Inc. v. Daley, 27 F. Supp. 2d 650, 668 (E.D. Va. 1998).

31. *Id.* at 652.

32. *Id.* at 661.

no threat to the sustained participation of North Carolina's fishing communities in the fishery.<sup>33</sup> NMFS reached this conclusion because it treated the entire state of North Carolina as one "fishing community." While its economic analysis looked at the number of North Carolina fishing vessels identified by principal port, home port, or residence as the sole basis for determining adverse effects on North Carolina's fishing communities, it concluded that fishing communities would not be adversely impacted because vessels were scattered throughout the state.

The summer flounder fishermen argued this conclusion was inconsistent with NS8. The court agreed.<sup>34</sup> The court found that "the Secretary has completely abdicated his responsibilities under the Magnuson Act . . . [by giving] no consideration to the population size of communities, the significance of the fishing industry on local economies, or to what even constitutes a fishing community."<sup>35</sup> Citing to expert testimony that fishing communities are better defined on a county-by-county basis, the court concludes that "an analysis of impacts on fishing communities should have been grounded in a geographical context."<sup>36</sup> The court held the agency had "acted arbitrarily and capriciously in failing to" meaningfully consider the economic effects of the 1997 quota on fishing communities in North Carolina and set the quota aside.<sup>37</sup> The court's opinion reinforced the narrower interpretation of the MSA to require consideration of the impacts of fishery management decisions only on place-based "fishing communities."

## II. NATIONAL STANDARD 8 IN PRACTICE

NOAA has developed substantial guidance to assist councils with the development of FMPs that "examine the social and economic importance of fisheries to communities potentially affected by management measures" and meet the NS8 mandate.<sup>38</sup> NOAA regulations state that the "appropriate vehicle" for the NS8 analysis is the Fishery Impact Statement.<sup>39</sup> Fishery Impact Statements are required by the MSA. In a fishery impact statement, councils must "assess, specify, and analyze the likely effects, if any, including the cumulative conservation, economic, and social impacts, of the conservation and management measures on,

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33. *Id.*

34. *Id.* at 664.

35. *Id.* at 662.

36. Daley, 27 F. Supp. 2d at 663.

37. *Id.* at 668.

38. 50 C.F.R. § 600.345(c)(1) (2023).

39. § 600.345(c)(2).

and possible mitigation measures for participants in the fisheries and fishing communities affected by the plan or amendment.”<sup>40</sup> NOAA regulations set a two-step process for addressing the sustained participation of fishing communities affected by management decisions. First, the analysis should identify the affected fishing communities.<sup>41</sup> Then, the analysis should assess the communities’ differing levels of dependence on and engagement in the fishery being regulated.<sup>42</sup> This analysis is traditionally accomplished through community profiles and ethnographic assessment.<sup>43</sup> One example of a tool that may inform such analysis is a series of Fishing Community Profiles maintained by NOAA that compile basic information on social and economic characteristics, as well as past and current engagement in fisheries.<sup>44</sup>

NOAA has developed twenty-five community profiles in the state of Louisiana, for example.<sup>45</sup> While the profiles have not been updated in several years, they provide key snapshots of the importance of fishing for the residents of these cities and towns. Consider Venice, Louisiana—a small community south of New Orleans. According to the community profile, 53.5% of the 202 residents of Venice made their living by agriculture or fishing.<sup>46</sup> In 2012, the species with the highest landings were white and brown shrimp in both pounds and value.<sup>47</sup>

NOAA guidance documents instruct all councils to conduct this analysis “at the level of place-based communities and assess their relative economic and social dependence on fishing and related industries.”<sup>48</sup> Interestingly, this approach does not require councils to first define a “fishing community.” Rather, as discussed in more detail below, the “place-based communities” that the councils are assessing appear to simply be coastal cities and towns within the relevant

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40. 16 U.S.C. § 1853(a)(9).

41. 50 C.F.R. § 600.345(c)(3) (2023).

42. *Id.*

43. Steve Jacob et al., *Exploring Fishing Dependence in Gulf Coast Communities*, 34 MARINE POL’Y 1307, 1307 (2010).

44. See *Fishing Community Profiles*, NOAA FISHERIES, <https://www.fisheries.noaa.gov/national/socioeconomics/fishing-community-profiles> (last visited Aug. 22, 2023) [<https://perma.cc/2AGR-RYHU>].

45. *Id.*

46. *Human Communities and Fisheries in the Southeast, Venice, LA*, NOAA FISHERIES, <https://apps-nefsc.fisheries.noaa.gov/read/socialsci/sero/createReport.php?state=LA&community=Venice> (last visited Aug. 22, 2023) [<https://perma.cc/ZS4M-2LA9>].

47. *Id.*

48. PATRICIA M. CLAY & LISA L. COLBURN, NAT’L OCEANIC & ATMOSPHERIC ADMIN., NMFS-F/SPO-212, A PRACTITIONER’S HANDBOOK FOR FISHERIES SOCIAL IMPACT ASSESSMENT 29 (2020).

geographic area. To assess fishing community dependence on the fishery being regulated, councils have two primary options to choose from: (1) using the NMFS fishing engagement and fishing reliance indicators and (2) calculating regional and local quotients.<sup>49</sup>

“Fishing engagement” measures the importance of fisheries to a given community relative to other coastal communities in a region.<sup>50</sup> Fishing engagement is measured by looking at the total number of permits, landings, and value for a particular fishery. “Fishing reliance,” on the other hand, is a per capita measure of engagement.<sup>51</sup> Fishing reliance uses many of the same data sources as fishing engagement, but “divides by population to give an indication of the per capita impact of this activity.”<sup>52</sup>

The “regional quotient” (RQ) is a measure of a community’s contribution to regional landings or value for a particular species or species group. It is calculated by dividing the total pounds (or value) of a species landed in a given community by the total pound (or value) landed in all communities in a particular region.<sup>53</sup> The RQ “represents the proportional distribution of commercial landings of a particular species by community.”<sup>54</sup> The “local quotient” is “a measure of the importance of a particular species or species group relative to all species landed in a community.”<sup>55</sup>

A review of recent amendments to FMPs under the authority of the Gulf of Mexico Fishery Management Council identified the use of the above methodologies and the identification of affected communities. For example, in Amendment 18 to the Gulf Shrimp FMP, the Council used a “commercial fishing engagement index score” to identify communities most likely to be affected by management changes to the shrimp fishery.<sup>56</sup> This score was a measure of shrimp fishing activity that looked at pounds and value of landings, number of shrimp permits, and number

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49. *Id.* at 36.

50. *Id.*

51. *Id.*

52. GULF OF MEXICO FISHERY MGMT. COUNCIL, SHRIMP PERMIT MORATORIUM, FINAL AMENDMENT 17A TO THE FISHERY MANAGEMENT PLAN FOR THE SHRIMP FISHERY OF THE GULF OF MEXICO, U.S. WATERS 43 (2016).

53. *See, e.g., id.* at 33.

54. *Id.* at 32.

55. CLAY & COLBURN, *supra* note 48, at 36.

56. GULF OF MEXICO FISHERY MGMT. COUNCIL, MODIFYING THE SHRIMP EFFORT THRESHOLD, FINAL SHRIMP AMENDMENT 18 TO THE FISHERY MANAGEMENT PLAN FOR THE SHRIMP FISHERY OF THE GULF OF MEXICO, U.S. WATERS 29 (2019) [hereinafter SHRIMP AMENDMENT 18].

of shrimp dealers within the community.<sup>57</sup> The Council identified seven communities: Bayou La Batre (AL), Palacios (TX), Port Arthur (TX), Chauvin (LA), Abbeville (LA), Brownsville (TX), and Port Isabel (TX).<sup>58</sup>

In an amendment to the Coastal Pelagics FMP, the Council used the RQ of commercial landings and value for cobia to consider impacts to affected communities.<sup>59</sup> The Council determined that about 23% of cobia is landed in Destin, Florida.<sup>60</sup> This was the highest amount of any community and represented “about 30% of the Gulf-wide ex-vessel value for the species.”<sup>61</sup> “The top Louisiana communities (New Orleans and Gretna) collectively represent about 19% of landings and 16% of value.”<sup>62</sup>

While these documents do identify the communities (i.e., cities and towns) most likely to be affected by fisheries management decisions, they do not expressly discuss the potential impacts of the decisions on those communities. Impacts are discussed only within the context of individual fishery participants or the wider fishing industry. For instance, in Amendment 18 to the Gulf Shrimp FMP, the Council only explicitly considers the potential impact of three potential management options on participants in the commercial and recreational sectors of the fishery.<sup>63</sup> There is no specific consideration of the potential impacts for the seven identified communities. Inferences, of course, can be made regarding community impact based on impacts to individual fishers and businesses. But given the MSA’s express directive to consider impacts of decisions on communities, the lack of an explicit discussion seems like a peculiar oversight.

Unless, “fishing community” simply means a group of fishers, by limiting their analysis to the impact of management decisions on fishery participants, councils are defining “fishing community” as a group of fishery participants living in a particular city or town. This is consistent with the NOAA regulatory definition, which states that “[a] fishing community is a social or economic group whose members reside in a specific location and share a common dependency on commercial,

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57. *Id.* at 29.

58. *Id.* at 30.

59. GULF OF MEXICO FISHERY MANAGEMENT COUNCIL, MODIFICATIONS TO GULF OF MEXICO MIGRATORY GROUP COBIA SIZE AND POSSESSION LIMITS 48 (2019).

60. *Id.* at 49.

61. *Id.*

62. *Id.*

63. SHRIMP AMENDMENT 18, *supra* note 56, at 33-40.

recreational, or subsistence fishing . . . .”<sup>64</sup> The dependency comes from participation in the fishery. When defined this way, there are both place-based and practice elements to fishing communities. Members share a practice—commercial, recreational or subsistence fishing for a certain species—but must live in a particular place. Yet this approach seems to place more emphasis on the community of practice—fishers—than the place-based community in which those fishers live. This is arguably in conflict with the Congressional intent in the SFA to give consideration to placed-based communities.

### III. PUBLIC PARTICIPATION IN FEDERAL DECISION-MAKING

The requirement that federal Fishery Management Councils take into consideration the impacts of their decisions on a particular stakeholder group—fishing communities—is rather unique in U.S. law. A more common approach in the United States is to broadly engage the public in federal decision-making. This engagement frequently occurs without any particular focus on key interest groups or certain segments of the population.

Generally speaking, in the United States, the public has the opportunity to participate in federal decision-making through public notice and comment requirements in rulemaking and environmental assessments, public hearings, or other mechanisms. The Administrative Procedure Act (APA), for instance, requires federal agencies to provide notice of changes to regulatory policy (e.g., adoption of new or changes to existing regulations) and an opportunity for the public to comment on those changes.<sup>65</sup> In most cases, the federal agency must respond to submitted comments, but they do not have to accept a commenter’s suggestions.<sup>66</sup>

The National Environmental Policy Act (NEPA) requires federal agencies to consider the environmental impacts of major federal actions, including the issuance of permits.<sup>67</sup> For actions “significantly affecting the quality of the human environment,” federal agencies must prepare an Environmental Impact Statement (EIS).<sup>68</sup> “Human environment” includes the “natural and physical environment,” as well as “the relationship of

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64. 50 C.F.R. § 600.345(b)(3) (2023).

65. *See* 5 U.S.C. §§ 551-59.

66. *See id.*

67. *See* 42 U.S.C. §§ 4321-47.

68. *Id.* § 4332(C).

people with that environment.”<sup>69</sup> Importantly, economic or social effects of an agency’s decision do not, by themselves, require the preparation of an EIS. The EIS, however, should discuss such effects if they are interrelated to physical or natural environmental effects.<sup>70</sup>

An agency’s consideration of environmental impacts pursuant to the NEPA process does not require a particular result, meaning the agency does not have to select the option with the least environmental impact.<sup>71</sup> Rather the agency must simply show that it fully considered the environmental impacts before making a decision.<sup>72</sup> Agencies are required to provide opportunities for public comment during the assessment process.<sup>73</sup> As with the APA, agencies must respond to submitted comments, but they do not have to accept commenters’ preferences.<sup>74</sup>

Contrast this with the decision-making process under the MSA. Similar to the APA and NEPA, the MSA mandates an open, public process for council decisions.<sup>75</sup> Council meetings are open to the public, and there are broad opportunities for public comment during the meetings and the development of FMPs and other actions.<sup>76</sup> NOAA policy directs, for example, that:

NMFS and the Councils should promote early and active involvement from stakeholders and the public by using effective communication tools to highlight opportunities for participation in the process and providing information and materials to support informed and meaningful participation.<sup>77</sup>

Further, because NOAA must issue regulations to implement FMPs, the rulemaking process provides additional public comment opportunities. Under the APA, NOAA must publish its intent to issue regulations in the Federal Register and provide opportunities for public comment.<sup>78</sup> As the approval of FMPs and associated rulemakings are

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69. 40 C.F.R. § 1508.14 (2023).

70. *Id.*

71. *See* 42 U.S.C. § 4332.

72. *See id.*; *see also id.* § 4336(b).

73. 40 C.F.R. §§ 1503.1, 1506.6 (2023).

74. *See* 5 U.S.C. §§ 552-553; 40 C.F.R. § 1503.4 (2023).

75. 16 U.S.C. § 1852(i)(2)(C).

76. *Id.*

77. NOAA, No. 01-101-03, OPERATIONAL GUIDELINES FOR THE MAGNUSON-STEVENS FISHERY CONSERVATION AND MANAGEMENT ACT FISHERY MANAGEMENT PROCESS 4 (2017).

78. 16 U.S.C. § 1854(a); *see also* 5 U.S.C. § 552(a).



often classified as major federal actions, they are also subject to NEPA requirements with public comment opportunities.<sup>79</sup>

However, unlike with NEPA where consideration of environmental impacts does not require a particular result, NOAA has interpreted NS8 to require councils to select the alternative with less impact on fishing communities, except in cases when such a choice would compromise conservation goals.<sup>80</sup> NOAA regulations state:

All other things being equal, where two alternatives achieve similar conservation goals, the alternative that provides the greater potential for sustained participation of such communities and minimizes the adverse economic impacts on such communities would be the preferred alternative.<sup>81</sup>

Court decisions support the agency's interpretation. The D.C. District Court, for example, has held that "National Standard 8 is a substantive provision,"<sup>82</sup> meaning the Councils have a legal obligation to minimize impacts to fishing communities to the extent practicable given conservation goals. More recently, in 2022, a district court in Alaska found that while NS8 does not guarantee access to a fishery, "the plain language of the standard indicates that the agency must engage in *some* analysis of potential mitigation measures."<sup>83</sup>

The MSA, therefore, provides a substantive requirement that agencies take the time to think about the impact of their decision on a particular place-based group of people—the fishing communities—and take steps to mitigate those impacts. NEPA, in contrast, only requires federal agencies to consider the impact of their decision on the natural and physical environment. While agencies must discuss interrelated economic and social effects, there is no specific requirement to consider the impact of a project on communities living within the area and take steps to mitigate those impacts.

#### IV. MID-BARATARIA SEDIMENT DIVERSION CASE STUDY

On March 5, 2021, the U.S. Army Corps of Engineers released a draft Environmental Impact Statement (EIS) for the Mid-Barataria

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79. NOAA, *supra* note 77, app. 2, at 4-5.

80. *Id.*

81. 50 C.F.R. § 600.345(b)(1) (2023).

82. North Carolina Fisheries Ass'n, Inc. v. Gutierrez, 518 F. Supp. 2d 62, 95 (D.D.C. 2007).

83. United Cook Inlet Drift Ass'n v. Nat'l Marine Fisheries Serv., No. 3:21-CV-00247, 2022 WL 2222879, at \*16 (D. Alaska June 21, 2022) (emphasis in original).

Sediment Diversion Restoration.<sup>84</sup> The Mid-Barataria Sediment Diversion (MBSD) structure will be located in Plaquemines Parish, LA, along the west bank of the Mississippi River. According to the Louisiana Coastal Protection and Restoration Agency (CPRA), the primary purpose of the project is to “reintroduce freshwater and sediment from the Mississippi River to the [Mid-Barataria] Basin to reestablish deltaic processes in order to build, sustain, and maintain land.”<sup>85</sup> Proponents of this and other large scale diversion projects identify a range of benefits from the anticipated wetlands restoration, including storm surge protection for “vulnerable communities,” improved fish and wildlife habitat, and economic benefits.<sup>86</sup>

While coastal restoration efforts enjoy broad support in the state, sediment diversions are quite controversial among coastal residents.<sup>87</sup> Despite unanimous support for the MBSD Project in the Louisiana Legislature, it’s “reviled” by coastal communities.<sup>88</sup> Debate surrounding the project highlights the variety of “communities” affected by these types of massive coastal restoration projects and the conflicts within and among such communities.

Sediment diversions are promoted as necessary storm protection for vulnerable communities. “The planning for the MBSD project has generally assumed that coastal communities would share the premise that decreasing salinity, increasing sedimentation, and emerging freshwater wetland ecosystems are good things . . . .”<sup>89</sup> The communities that would benefit from the project are inland/upland urban areas located north of the diversion—primarily New Orleans and Baton Rouge.<sup>90</sup> If the

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84. *Mid-Barataria Sediment Diversion (MBSD)*, U.S. ARMY CORPS OF ENGINEERS, <https://www.mvn.usace.army.mil/Missions/Regulatory/Permits/Mid-Barataria-Sediment-Diversion-EIS/> (last visited Jan. 25, 2023) [<https://perma.cc/F2DY-KCB3>]. The final EIS was released in September 2022. *Id.*

85. *Mid-Barataria Sediment Diversion*, COASTAL PROT. & RESTORATION AUTH., <https://coastal.la.gov/project/mid-barataria-sediment-diversion/> (last visited Aug. 22, 2023) [<https://perma.cc/JQ8W-33RX>].

86. LA. COASTAL PROT. & RESTORATION AUTH., RECONNECTING THE RIVER 4, [https://coastal.la.gov/midbarataria/assets/docs/MBSD\\_Executive\\_Summary.pdf](https://coastal.la.gov/midbarataria/assets/docs/MBSD_Executive_Summary.pdf) (last visited Aug. 22, 2023) [<https://perma.cc/4E3Y-9XKW>].

87. Jacob E. Lipsman, *Non-Decision Power and Political Opportunity: Exposing Structural Barriers to Mobilization in Louisiana’s Coastal Restoration Conflict*, 7 SOCIAL CURRENTS 508, 508-09 (2020).

88. Grant S. McCall & Russell D. Greaves, *Creating a Diversion: Why the Mid-Barataria Sediment Diversion (MBSD) Project Is Unpopular Among Coastal Communities in Southeast Louisiana*, 56 MARINE TECH. SOC’Y J. 67, 68 (2022).

89. *Id.* at 80 (emphasis omitted).

90. *Id.* at 78.

diversion works, it will rebuild wetlands to absorb the impacts of storms on inland areas.<sup>91</sup>

But what about the “vulnerable communities” that are downstream of the diversion? The Corps’ Draft EIS for the Project stated clearly that the Project would have negative impacts.<sup>92</sup> There are low-income and minority communities just downstream from the diversion that would see increased flooding and increased storm impacts, both of which will damage property.<sup>93</sup> As summarized by the Corps:

The proposed Project is expected to cause minor to moderate, permanent, adverse impacts on economy, population, housing and property values, tax revenues, public service, and community cohesion in communities near the immediate outfall area (within 10 miles north and 20 miles south) outside of flood protection due to increased tidal flooding and outmigration.<sup>94</sup>

This increase in flooding from the diversion would compound the increased flood risk these communities are already experiencing due to climate change, leading to strong opposition from residents of downstream communities who perceive that their homes are being sacrificed for the benefit of upstream communities.<sup>95</sup>

Commercial and recreational fishers have also voiced strong opposition to the project due to concerns about the impacts on their businesses and way of life.<sup>96</sup> Oysters and brown shrimp are anticipated to suffer the most negative impacts.<sup>97</sup> As more fresh water is diverted into

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91. See, e.g., U.S. ARMY CORPS OF ENGINEERS, MID-BARATARIA SEDIMENT DIVERSION EIS, EXECUTIVE SUMMARY DRAFT, ES-14, [https://www.mvn.usace.army.mil/Portals/56/docs/regulatory/permits/EIS/MBSD\\_DEIS\\_Executive\\_Summary.pdf](https://www.mvn.usace.army.mil/Portals/56/docs/regulatory/permits/EIS/MBSD_DEIS_Executive_Summary.pdf) [<https://perma.cc/TY5Z-PXH4>] (“Project is expected to have some beneficial impacts related to additional protection from storm hazards due to reduced storm surge and wave heights as a result of land building”) [hereinafter MID-BARATARIA SEDIMENT DIVERSION EIS].

92. *Id.* at ES-12.

93. Olivia Vidal, *Plaquemines Parish Council Votes in Opposition of Mid-Barataria Sediment Diversion*, FOX8 (Apr. 8, 2021, 10:46 PM), <https://www.fox8live.com/2021/04/09/plaquemines-parish-council-votes-opposition-mid-barataria-sediment-diversion/> [<https://perma.cc/A48Z-Z4GT>].

94. MID-BARATARIA SEDIMENT DIVERSION EIS, *supra* note 91, at ES-13.

95. See generally Monica Patrice Barra, *Good Sediment: Race and Restoration in Coastal Louisiana*, 111 ANNS. AM. ASSOC. GEOGRAPHERS 266, 277 (2021).

96. Xandra Peters, *An Oysterman’s New Worry: Will State’s Coastal Plan Wash Out His Business?*, CHRISTIAN SCI. MONITOR (May 17, 2021), <https://www.csmonitor.com/Environment/2021/0517/An-oysterman-s-new-worry-Will-state-s-coastal-plan-wash-out-his-business> [<https://perma.cc/E329-8A88>].

97. MID-BARATARIA SEDIMENT DIVERSION EIS, *supra* note 91, at ES-12-14.

the sound, the decrease in salinity and increase in sediment will modify the existing habitat too much for those species to thrive.<sup>98</sup> Fishers have also voiced concerns about the political willingness of state and federal authorities to sacrifice the well-being of coastal fisheries in the interest of improving storm protection for inland population centers.<sup>99</sup>

Given the scale of the MBSD project, it is unsurprising that there are conflicts among the place-based communities, as well as communities of practice and interest in the area. Further, the use of outlets from the Mississippi River, such as the Bonnet Carre spillway and Caernarvon Freshwater Diversion project, “has had repeated, episodic economic impacts on resource-based societies.”<sup>100</sup> While risks of wetlands loss are shared by all communities along the Louisiana coast, communities downstream of the MBSD will not experience the same flooding and storm protection benefits from the diversion.<sup>101</sup> In fact, the diversion will result in these communities facing additional harm from increased flooding and loss of their livelihoods or recreational opportunities (e.g., commercial and recreational fishing).<sup>102</sup> While the decision-making process for the sediment diversion projects do not implicate federal fisheries management, the MSA’s directives to take into account the impact of a policy decision on a fishing community is an interesting model to consider in light of the fishing community’s opposition to the MBSD project.

Before the Louisiana Coastal Protection and Restoration Authority can begin work on the MBSD, it must obtain permits from the U.S. Army Corps of Engineers.<sup>103</sup> The issuance of these permits is a major federal action requiring environmental review under NEPA.<sup>104</sup> Since the Corps published its notice of intent to prepare an Environmental Impact Statement (EIS) for the MBSD project in October 2013, there have been several opportunities for public comment. There was a 60-day formal scoping comment period in 2017 which included three public meetings. The Draft EIS, which analyzed the potential environmental impacts from

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98. *Id.* at 12.

99. See McCall & Greaves, *supra* note 88, at 79.

100. Craig E. Colten, *Environmental Management in Coastal Louisiana: A Historical Review*, 33 J. COASTAL RSCH. 699, 702 (2017).

101. MID-BARATARIA SEDIMENT DIVERSION EIS, *supra* note 91, at ES-19; see also McCall & Greaves, *supra* note 88, at 78.

102. MID-BARATARIA SEDIMENT DIVERSION EIS, *supra* note 91, at ES-19.

103. *Obtain a Permit*, U.S. ARMY CORPS OF ENGINEERS <https://www.usace.army.mil/missions/civil-works/Regulatory-Program-and-permits/Obtain-a-Permit/>, (last visited Aug. 22, 2023) [<https://perma.cc/97R9-DCUJ>].

104. 42 U.S.C. § 4332.

construction and operation of the MSBD, was released in 2021. Three public meetings were held to obtain input on the Draft EIS.

Unfortunately, the public comment periods and hearings associated with NEPA scoping are widely argued to be an “ineffective means of achieving meaningful participation.”<sup>105</sup> While every citizen theoretically has an opportunity to comment during the NEPA process, “realistically, some citizens lack the means to fully utilize this opportunity.”<sup>106</sup> Further, many potential benefits from public participation are not realized because the process is designed to be consultative to agency decision-making.<sup>107</sup> Agencies must solicit and consider public comments, but they do not have to accept them. “It is fairly well documented at this point that, outside of a few examples of engaged collaborative structures, the general public, and even organized interests tend to have little effect on bureaucratic decisions, especially when comment–response, such as the process used under NEPA, is the method of participation.”<sup>108</sup> Such notice-and-comment processes often lead to “perceptions of unfairness, distrust, anger, and intractable disagreement on both the government and citizen side.”<sup>109</sup>

This dynamic can be seen at play in the opposition from fishing communities in Plaquemines Parish to the MBSD project. Despite numerous opportunities for public involvement, the “public still expresses frustrations.”<sup>110</sup> Even before the Corps began soliciting comments during the EIS process, the CPRA held public meetings related to the Louisiana Coastal Master Plan which included several diversion projects. However, such outreach efforts “were perceived by locals as the bare minimum required for acquiring a permit for sediment diversions, and a strong belief existed that public comments were not

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105. Taylor N. Johnson, *The Dakota Access Pipeline and the Breakdown of Participatory Processes in Environmental Decision-Making*, 13 ENV'T COMM. 335, 337 (2019).

106. Marion Hourdequin et al., *Ethical Implications of Democratic Theory for U.S. Public Participation in Environmental Impact Assessment*, 35 ENV'T IMPACT ASSESSMENT REV. 37, 41 (2012).

107. Hal Nelson et al., *Communities of Place vs Communities of Interest in the United States: Citizen Information and Locally Unwanted Land Uses in EIA*, 87 ENV'T IMPACT ASSESSMENT REV. 1, 2 (2021).

108. Adam Eckerd, *Citizen Language and Administrative Response: Participation in Environmental Impact Assessment*, 49 ADMIN. & SOC'Y 348, 349 (2017).

109. *Id.*

110. Colten, *supra* note 100, at 707.

being considered” and their communities’ interests were ignored.<sup>111</sup> Community members also reported to researchers “grave mechanical difficulties” in submitting comments.<sup>112</sup>

Despite the perception of fishing community members, the Corps’ draft EIS demonstrates that impacts on commercial and recreationally important fish species were considered during the NEPA process. The EIS acknowledged that downstream communities and fisheries would experience adverse impacts.<sup>113</sup> But, because NEPA does not require a particular outcome or any particular balancing of interests, those adverse impacts did not need to be avoided or mitigated. This is not an unusual occurrence with NEPA processes, although the affected communities’ frustration is understandable. Possible negative impacts are often disclosed without resulting in project changes or specific permit requirements.<sup>114</sup>

Would a clear directive in NEPA, similar to that of NS8 in the MSA have changed the outcome? Probably not. Despite the clear directive of NS8 to take the economic impacts of fishing communities into account, it is not clear these considerations have significantly influenced decision-making. Fishing community considerations must always give way to achieving the conservation goals of the MSA.<sup>115</sup> Only when two options can equally achieve conservation goals are the councils instructed to choose the least impactful choice.<sup>116</sup> A similar tension would remain with a NEPA analysis, as environmental impacts have a priority over economic and social impacts.

Greater opportunity for public comment during the federal decision-making process by itself is unlikely to resolve conflicts surrounding large restoration projects, such as the MBSD. Regulators must work to build greater trust between themselves and local stakeholders.<sup>117</sup> As described by Jacob Lipsman in 2019, “[t]rust issues between coastal stakeholders and social institutions [in Louisiana] have hindered the political process around coastal planning and management, potentially disrupting positive

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111. Jacob E. Lipsman, *Local Knowledge and Democracy in Fisheries Management: A Case Study of Adaptation to the Anthropocene in Southeast Louisiana*, 24 *ECOLOGY & Soc’Y* 20 (2019).

112. McCall & Greaves, *supra* note 88, at 80.

113. MID-BARATARIA SEDIMENT DIVERSION EIS, *supra* note 91, at ES-8, 12, 14, 19.

114. *See, e.g.*, Benjamin Teschner & Elizabeth Holley, *Participation or Frustration? Local Stakeholders and the National Environmental Policy Act (NEPA): Donlin Gold Project, Western Alaska*, 8 *EXTRACTIVE INDUS. & Soc’Y* 100962 (2021).

115. *See* 16 U.S.C. § 1851(a)(1).

116. 50 C.F.R. § 600.345(b)(1) (2023).

117. Teschner & Holley, *supra* note 114.

outcomes for local fisheries.”<sup>118</sup> While public participation is often promoted as a way to build trust,<sup>119</sup> the chosen methods are not always effective at achieving those goals as seen in the MBSD project case study.

This may be due in part to the fact that public participation in the United States is not generally designed to shift decision-making power to the public. The International Association for Public Participation (IAPP) developed a five-stage spectrum of public participation that ranges from “inform” to “empower.”<sup>120</sup> Legal mandates in the United States for public participation tend to limit agencies to the first two IAPP stages—“inform” and “consult.”<sup>121</sup> Federal agencies promise to keep the public informed, listen to and acknowledge concerns, and provide feedback on public input.<sup>122</sup> They are not required to incorporate the public’s advice (collaborate) or place final decision-making in the hands of the public (empower), the last two stages of the IAPP spectrum.<sup>123</sup> Adapting public participation processes to move towards these more active roles, especially for directly impacted communities, is one path to consider to address trust issues.

Another path to consider is increased support for participatory research. Participatory research can facilitate trust among stakeholder groups and shared decision-making.<sup>124</sup> In a recent study of the engagement of Vietnamese-American fishing stakeholders in the U.S. Gulf Coast with state and federal agencies, researchers found that participatory research projects, when effectively employed, “may help facilitate stakeholder engagement through the creation of trust and mutual respect.”<sup>125</sup> In a separate study, a team of natural and social

118. Lipsman, *supra* note 111.

119. *See generally*, Saki Kumagai & Federica Ioria, WORLD BANK GROUP, BUILDING TRUST IN GOVERNMENT THROUGH CITIZEN ENGAGEMENT, <https://openknowledge.worldbank.org/bitstream/handle/10986/33346/Building-Trust-in-Government-through-Citizen-Engagement.pdf>.

120. INT’L ASSOC. PUB. PARTICIPATION, IAP2 SPECTRUM, <https://iap2usa.org/resources/Documents/Core%20Values%20Awards/IAP2%20-%20Spectrum%20-%20stand%20alone%20document.pdf> [<https://perma.cc/PXV4-CNLL>].

121. *See* Sanne Akerboom & Robin Kundis Craig, *How Law Structures Public Participation in Environmental Decision Making: A Comparative Law Approach*, 32 ENV’T POL’Y & GOV. 232, 243 (2022).

122. INT’L ASSOC. PUB. PARTICIPATION, *supra* note 120.

123. *Id.*

124. Lipsman, *supra* note 111.

125. Rebecca L. Schewe et al., *Citizen-Science and Participatory Research as a Means to Improve Stakeholder Engagement in Resource Management: A Case Study of Vietnamese American Fishers on the US Gulf Coast*, 65 ENV’T MGMT. 74, 84 (2020).

scientists working with local residents and resource users in southeast Louisiana developed a participatory modeling approach to capture community knowledge and inform coastal restoration planning.<sup>126</sup> Participatory research can provide additional opportunities for agencies to engage and learn from community members, which ideally would lead to a greater awareness of concerns and willingness to take steps to mitigate risk.

#### CONCLUSION

A variety of communities may be directly and indirectly affected by coastal restoration projects. Affected communities include both place-based communities whose members live near the project location and practice-based communities with economic, social, or other ties to the project. These communities may disagree about the costs and benefits of particular projects.

Further, there is no one definition of community and how a particular community is defined may vary depending on who is speaking. Even when there is an explicit definition, such as for fishing communities under the MSA, it is difficult to apply such definitions in practice. It is, therefore, critically important that agencies, organizations, and individuals clearly state who they are referring to when they use the term “community.”

While it may not always be easy to define that community—as seen in implementation of NS8—it is an essential step towards ensuring that all impacted communities are identified, engaged, and heard. A lack of attention to the conflicts within and among communities can erode trust and support for projects, as illustrated by the MBSD Case Study. Although the environmental review process for large coastal restoration projects does not implicate the MSA fishing community analysis mandate, it could be a model for how to identify and mitigate impacts on affected communities in the future.

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126. See Scott A. Hemmerling, *Elevating Local Knowledge Through Participatory Modeling: Active Community Engagement in Restoration Planning in Coastal Louisiana*, 22 J. GEOGRAPHICAL SYS. 241 (2020).



