

Draft Environmental Assessment

St. Charles Parish DHS/EP EOC
Communications Tower
St. Charles Parish, Louisiana

Port Security Grant Program
Project # 2010-PU-T0-K035 (11749)

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Federal Emergency Management Agency
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List of Acronyms and Abbreviations

BMP	Best Management Practices
CZMA	Coastal Zone Management Act
CFR	Code of Federal Regulations
EA	Environmental Assessment
EPA	Environmental Protection Agency
EO	Executive Order
DHS	Department of Homeland Security
EIS	Environmental Impact Statement
EOC	Emergency Operations Center
EP	Emergency Preparedness
FAA	Federal Aviation Administration
FPPA	Farmland Protection Policy Act
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of Significant Impact
MDA	Maritime Domain Awareness
NAAQS	National Ambient Air Quality Standards
NGVD	National Geodetic Vertical Datum
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NRIS	National Register Information System
NWI	National Wetlands Inventory
PSGP	Port Security Grant Program
USACE	United States Army Corps of Engineers
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service

1 Introduction

St. Charles Parish has been awarded, under a Port Security Grant Program (PSGP), authorization to construct a two hundred fifty (250) foot new communications tower, with a lightning rod, any antennae, or other devices mounted to the structure resulting in a maximum height of two hundred seventy-five (275) feet. This communications tower will enhance the interoperable communications among all first responder disciplines during times of natural or man-made disasters.

The PSGP provides grant funding to port areas for the protection of critical port infrastructure from terrorism. PSGP funds are primarily intended to assist ports in enhancing maritime domain awareness, enhancing risk management capabilities to prevent, detect, respond to and recover from attacks involving improvised explosive devices, weapons of mass destruction and other non-conventional weapons, as well as training and exercises and Transportation Worker Identification Credential implementation.

This Environmental Assessment (EA) has been prepared according to the requirements of the National Environmental Policy Act (NEPA), as applied to the Federal Emergency Management Agency (FEMA) at 44 CFR Part 10. This section of the federal code requires that FEMA take into account environmental considerations when authorizing or approving actions and pursuant to the National Environmental Policy Act.

The purpose of this EA is to analyze the potential environmental impacts of the proposed construction of a communications tower facility. FEMA will use the findings in this EA to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

2 Purpose and Need

There is a region Saint Charles Parish that has an antiquated communication system that consist of a thirty plus years old Emergency Operations Center (EOC) communications tower and an existing 20 years old 911 communications tower, both currently in operation. Both existing towers have reached capacity and cannot accommodate additional communications equipment.

As a result, Saint Charles Parish needs an updated communication system in support of the Lower Mississippi Port-Wide Strategic Security Council and Port of South Louisiana's efforts to increase maritime domain awareness, regional two-way interoperable communications, and communication infrastructure to support network connectivity to Marine Domain Awareness (MDA) field devices including video surveillance, and other detection systems.

Saint Charles proposed upgrading the regional communication system that will support the newly constructed EOC, Lower Mississippi Port-Wide Strategic Security Council and Port of South Louisiana's need to improve public safety and interoperable communications amongst multiple agencies and emergency responders during emergency events.

The objective of the PSGP 2010, as per Fiscal Year 2010 (FY2010) Grant Guidance is to “support increased port-wide risk management; enhanced domain awareness... and further capabilities to prevent, detect, and respond to and recover from attacks involving improvised explosive devices and other non-conventional weapons” (FY 2010 PSGP Grant Guidance). A new regional communications tower is needed in St. Charles Parish to improve public safety and interoperable communications amongst multiple agencies and emergency responders during emergency events.

3 Alternatives

This section describes the alternatives that were considered in addressing the purpose and need in Section 2. Two alternatives were considered as potential solutions to improving public safety and interoperable communications amongst multiple agencies and emergency responders during emergency events in St. Charles Parish. Both alternatives are carried forward for further evaluation in this EA: The No Action Alternative (Alternative 1), and the Proposed Action Alternative (Alternative 2), which involves the construction of 250-foot St. Charles Parish Communication Tower.

Alternative No. 1- No Action

Under this alternative, the proposed tower would not be constructed. The existing EOC communications tower has reached its capacity and cannot support additional communications equipment needed for regional maritime risk management efforts or for the new EOC building, placing public safety at risk during emergencies due to communications among emergency responders being compromised.

Alternative No. 2- Proposed Action

The proposed action is to construct a maximum two hundred seventy-five (275) feet new free-standing communications tower, including a lightning rod, any antennae, or associated equipment to be mounted to the structure, that meets or exceeds the American National Standards Institute/ Telecommunications Industry Association 222 Revision G (Structure Class III supporting public safety, emergency operations and other mission critical communications) specification for communications towers. Furthermore, the installation of antennae and associated equipment will provide integrated emergency communications between federal, state, and local agencies during emergency situations. The antennae would include microwave dishes that are to be used to send and receive information over long distances without the limitations associated with connection to land lines/cables (primarily interruptions in service due to damage to land lines/cables during emergencies or natural disasters). The facility construction also includes an emergency generator with a propane tank. The preliminary foundation design includes: twenty-four (24), 14” x 73’ H piles with 18” x 1-1/4” base cap driven 70’ below grade, twenty-eight (28), 14” x 73’ H piles with 18” x 1-1/4” base cap driven 65’ below grade, and a 3’ 6” thick 30’ diameter concrete foundation. The site consists of a shell parking lot and grassed land. The proposed communications tower will be designed for future enhancements to mission

critical hardware. The 529 sq. ft. tower footprint will be adjacent to the new EOC building that is currently under construction (see Grading Plan and Aerial Photo, Appendix A).

The new tower will affect approximately 60% of the Port of South Louisiana's maritime jurisdiction from Mississippi River mile 114.8 - 168.7 Above Head of Passes. The tower is designed to accommodate tower assets including antennae for multiple VHF communications frequencies, parabolic antennae for microwave backhaul radios systems, security cameras to monitor critical navigation points on the Mississippi River from MM 155 – 157 AHP and point-to-multipoint devices to accommodate connectivity to MDA field devices.

The site of the proposed St. Charles Parish Department of Homeland Security and Emergency Preparedness (DHS/EP) EOC communications tower is located at 15026 River Road (LA Hwy. 18) in Hahnville, Louisiana along the Mississippi River (29.96361 Latitude; -90.40472 Longitude). The site of the proposed tower is on land currently owned by St. Charles Parish (see Regional Aerial and USGS Topographic Map in Appendix B).

4 Alternatives Considered and Dismissed

Two other alternatives were considered but dismissed because they did not meet the Parish's purpose and need or were considered infeasible.

Alternative No. 3- Use of Existing EOC Communications Tower

Use of the existing eighty-five (85) feet EOC communications tower currently in operation was considered. However, the thirty plus years old tower has reached its capacity and cannot accommodate additional communications equipment. This alternative is not a viable option because the existing structure's foundation cannot not be retrofitted due to inadequacies associated with the age of the structure.

Alternative No. 4 – Use of Existing 911 Communications Tower

Use of the existing 20 years old, three hundred and three (303) feet, 911 communications tower currently in operation was considered. The tower, although younger than the existing EOC tower, has also reached its capacity and cannot accommodate additional communications equipment. Additionally, the cost of retrofitting the structure to accommodate additional equipment and boring a connection the distance to the new EOC building would well exceed the cost of constructing the proposed new tower, making this alternative not a viable option.

As previously mentioned, Alternatives 3 and 4 were dismissed and will not be discussed any further in this EA.

5 Geology, Soils, and Seismicity

Under the No Action alternative, there would be no short- or long-term impacts to soils, geologic resources, or seismic features.

According to the Louisiana Geological Survey, the project site is underlain with deposits from the natural levees flanking the Mississippi River meander belt 1, typically consisting of sandy silt, silt, clayey silt, silty clay, and clay.

According to the United States Department of Agriculture (USDA) Soil Conservation Service, the proposed site is underlain with Cancienne silt loam, 0 to 1 percent slopes. Predominately, this is a mixture of deposits of sediments from the Mississippi River. Soil consistency is medium stiff to very soft gray and brown silt, clay top soil to medium dense gray and brown silt and sand with organics at deeper depths. The elevation is approximately thirteen (13) feet above National Geodetic Vertical Datum (NGVD).

The Farmland Protection Policy Act (FPPA) (P.L. 97-98, Sec. 1539-1549; 7 U.S.C. 4201, et seq.) is intended to minimize the impact federal programs have on unnecessary and irreversible conversion of farmland to nonagricultural uses. FPPA assures that federal programs are administered to be compatible with various programs to protect farmland. For the purpose of FPPA, farmland definition includes prime farmland, unique farmland, and land of statewide or local importance; it is important to note that these definitions include land such as forestland, pastureland, or other land that is not in current production. As the proposed tower site is an area that is urbanized and developed, the proposed project site is not considered prime farmland by the United States Department of Agriculture, National Resources Conservation Service.

Ground disturbance would be confined to the driving of pilings and forming of the concrete foundation to support the tower. Adjacent developed areas are not expected to be impacted. The proposed site would be accessed by locked gate. Appropriate signage will be installed as required by local, state and federal laws.

There are no known tectonic faults near the proposed site. Appropriate best management practices (BMPs) would be implemented during site development to minimize sediment migration from the site into nearby water bodies. Proper disposal of any hazards will be utilized. Therefore, the Proposed Action will not impact geologic resources and will not have significant impacts to soils.

6 Water Resources

Under the No Action alternative, there would be no short- or long-term impacts to water resources.

The National Pollutant Discharge Elimination System (NPDES) was established under the Clean Water Act and regulates wastewater discharges from point sources. NPDES regulations require that construction sites resulting in greater than one acre of disturbance obtain a permit from the Environmental Protection Agency (EPA), or the corresponding state agency where the permitting role has been assumed by the state. In Louisiana, the Louisiana Department of Environmental Quality is the state agency that has assumed this responsibility.

The proposed site, which is within fifteen hundred (1,500) feet west of the Mississippi River, is within the levee jurisdiction of The Board of Commissioners of the Lafourche Basin Levee District, U.S. Army Corps of Engineers (USACE), and the Office of Coastal Protection and Restoration Authority of Louisiana. The Board of Commissioners of the Lafourche Basin Levee District, and in behalf of U.S. Army Corps of Engineers (USACE), has conditionally approved the project. The Office of Coastal Protection and Restoration Authority of Louisiana has indicated that the proposed activity is exempt and a Coastal Use Permit is not required. (Appendix C).

The tower footprint is five hundred twenty-nine (529) square feet. There are no utility connections. Land-disturbing activities at the proposed communication tower facility will be below the one-acre threshold requiring an NPDES permit.

Appropriate BMPs would be implemented during site development to minimize sediment migration from the site into nearby water bodies. Surface runoff will be controlled by using biodegradable barriers such as hay bales to minimize erosion. Proper disposal of any hazards will be utilized. Therefore, the Proposed Action would have no significant impacts to water quality in the area of the site.

7 Wetlands

Under the No Action alternative, there would be no short- or long-term impacts to wetlands.

Under the Clean Water Act (40 CFR 230.3), and Executive Order (EO) 11990, wetlands are defined as “those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated conditions. Wetlands generally include swamps, marshes, bogs and similar areas.” Based on the United States Fish and Wildlife Services (USFWS) National Wetlands Inventory (NWI) map available online at the National Wetlands Inventory website (<http://fws.gov/wetlands/>), no wetlands were identified in the project area (Appendix B). The proposed communication tower site is currently a shell parking lot and maintained lawn. Therefore, the Proposed Action will not impact wetlands.

8 Floodplain

Under the No Action alternative, there would be no short- or long-term impacts to floodplains.

Mississippi River Mainline Levees protect the area from seasonal flooding. Based on the review of applicable FEMA Flood Insurance Rate Map (FIRM), Panel No. 220160 0125 C, revised June 16, 1992, retrieved from the FEMA website (<http://msc.fema.gov>), the proposed communication tower site is located in a Zone X, defined as an area being protected from the 1% percent annual

chance or greater flood hazard by a levee system (Floodplain Map, Appendix B). Therefore, the Proposed Action would not impact or be impacted by the 100-year floodplain.

9 Coastal Resources

Under the No Action alternative, there would be no short- or long-term impacts to coastal resources.

The Coastal Zone Management Act (CZMA) was established in 1972 to preserve, protect, and (where possible) restore or enhance the resources of the coastal zones of the United States.

The Coastal Zone in Louisiana runs from the Louisiana/Mississippi Stateline to the Louisiana/Texas Stateline encompassing fifteen thousand (15,000) miles of the Gulf of Mexico. Most of Saint Charles Parish is within the Louisiana Coastal Zone. The Louisiana Department of Natural Resources, Office of Coastal Management indicated in a letter dated September 30, 2010 that in accordance with the State and Local Coastal Resources Management Act of 1978, as amended (La. R.S. 49:214.34.a), the proposed activity is exempt and a Coastal Use Permit is not required (Appendix C). Therefore, the Proposed Action does not require a coastal use permit and would not impact coastal resources.

10 Wild and Scenic Rivers

Under the No Action alternative, there would be no short- or long-term impacts to Wild and Scenic Rivers.

A review of information available through the www.rivers.gov website indicates that one Wild and Scenic River is located in Louisiana. This Wild and Scenic River is Saline Bayou in the Kisatchie National Forest in northeastern Louisiana. Saint Charles Parish is located more than 200 miles southeast of the Kisatchie National Forest. The proposed communications tower would have no impacts to any designated Wild and Scenic River.

11 Threatened and Endangered Species and Critical Habitat

Under the No Action alternative, there would be no short- or long-term impacts to Threatened and Endangered Species or Critical Habitat.

Section 7 of the Endangered Species Act of 1973 (16 U.S.C. 1536a2) directs federal agencies to utilize their authorities in furtherance of the purposes of the Act by carrying out programs for the conservation of listed species or designated critical habitats. In addition, Section 7 of the Act sets out the consultation process, which is further implemented by regulation (50 CFR 402). According to the Louisiana page of the USFWS Threatened and Endangered Species System

website

(http://ecos.fws.gov/tess_public/countySearch!speciesByCountyReport.action?fips=22089), threatened or endangered species are known to exist in St. Charles Parish (Appendix B).

The Gulf Sturgeon (*Acienser oxyrinchus desotoi*) is listed as a threatened fish species in St. Charles Parish. Gulf Sturgeon spawn in long, spring-fed, free-flowing rivers and migrate into marine waters in fall and winter.

The Pallid Sturgeon (*Acienser scaphirhynchus*) is listed as an endangered fish species in St. Charles. Pallid Sturgeon are found in the Mississippi River where they are adapted for living close to the bottom of the swift, silty river in sand flats and gravel bars.

The West Indian Manatee (*Trichechus manatus*) is listed as an endangered mammal in St. Charles Parish. Manatees are found in marine, estuarine, and freshwater environments.

Louisiana Black Bear (*Ursus americanus luteolus*) is listed as a threatened mammal in St. Charles Parish. The Louisiana Black Bear frequents deep woods. Key habitat requirements of black bears include food, water, cover, and denning sites spatially arranged across sufficiently large, relatively remote blocks of land. Louisiana Black Bears typically inhabit bottomland hardwood forests but also utilize other types of forested habitats. Other documented habitat types used include brackish and freshwater marshes, salt domes, wooded spoil levees along canals and bayous, and agricultural fields.

The proposed communication tower will be located adjacent to the new St. Charles Parish EOC, which is located in a commercially zoned area near the Mississippi River levee on the gently sloping natural levee deposits. The parcel of land is currently under development with the construction of the EOC ongoing; therefore, none of the previously discussed threatened and endangered species, or supporting habitat exists on the proposed communication tower site. A search of the U.S. Fish & Wildlife Service Critical Habitat Portal (<http://criticalhabitat.fws.gov/crithab/>) resulted in a finding of no species' critical habitats in St. Charles Parish, Louisiana. Based on the proposed scope of work and the existing habitat as described in this EA, FEMA has determined that the proposed construction will have "No Effect" on listed species documented for St. Charles Parish. Therefore, the Proposed Action will not impact threatened and endangered species or their critical habitats.

12 Migratory Birds

Under the No Action alternative, there could be potential impacts to migratory birds because the existing tower would remain.

The Migratory Bird Treaty Act (16 U.S.C. 703) established a federal prohibition, unless permitted by regulations, to "pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried

by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, or any part, nest, or egg of any such bird."

St. Charles Parish is located within the Central Flyway for migratory birds. BMPs should be implemented for avoiding harassment and harm to migratory birds during construction activities. Impacts on migratory birds could be expected as a result of collision with operating towers, antennae, and other tall structures, particularly during periods of low visibility and as a result of tower lighting that might be distracting to some species. The probability of collision is difficult to determine programmatically due to the range of variables that affect the potential for collision and the lack of conclusive data on the causes of collision. The following 12 guidelines of the USFWS *Service Guidelines for Recommendations on Communications Tower Sites, Construction, Operation, and Decommissioning* were evaluated with regards to the proposed project.

1. Any company/applicant/licensee proposing to construction a new communications tower is strongly encouraged to co-locate the communications equipment on an existing communication tower or other structure (e.g., billboard, water tower, or building mount). Depending on tower load factors, from 6 to 10 providers may collocate on an existing tower.

Response: Other regional towers were considered for co-location. However, available towers had structural deficiencies and inadequate capacity to accommodate additional communication equipment.

2. If collocation is not feasible and a new tower or towers are to be constructed, communications service providers are strongly encouraged to construct towers no more than 199 feet above ground level (AGL), using construction techniques which do not require guy wires (e.g., use a lattice structure, monopole, etc). Such towers should be unlighted if Federal Aviation Administration (FAA) regulations permit.

Response: The proposed 275 foot freestanding tower is designed for future enhancements to mission critical hardware. It will accommodate tower assets including antennae for multiple VHF communications frequencies, parabolic antennae for microwave backhaul radios systems, security cameras to monitor critical navigation points on the Mississippi River from MM 155 – 157 AHP and point-to-multipoint devices to accommodate connectivity to MDA field devices. As a result, it will minimize the number of additional towers needed in the area. The alternative of multiple shorter towers could potentially increase the cumulative effects to soil, vegetation, wetlands, wildlife habitat, threatened and endangered species and/or migratory birds.

3: If constructing multiple towers, providers should consider the cumulative impacts of all of those towers to migratory birds and threatened and endangered species as well as the impacts of each individual tower.

Response: The construction of a 275-foot communications tower may alleviate the need for future development of additional towers for the area that are of a lower height. The alternative of constructing multiple shorter towers could potentially increase the cumulative effects to soil,

vegetation, wetlands, wildlife habitat, and threatened and endangered species, as well as migratory birds.

4: If at all possible, new towers should be sited within existing “antenna farms” (clusters of towers). Towers should not be sited in or near wetlands, other known bird concentration areas (e.g., state or federal refuges, staging areas, rookeries), in known migratory or daily movement flyways, or in habitat of threatened or endangered species. Tower should not be sited in areas with a high incidence of fog, mist, and low ceilings.

Response: The proposed communication tower is within ½ mile of several towers. However, these towers have reached capacity and cannot accommodate additional communications equipment.

5: If taller (>199feet AGL) towers requiring lights for aviation safety must be constructed, the minimum amount of pilot warning and obstruction avoidance lighting required by the FAA should be used. Unless otherwise required by the FAA, only white (preferable) or red strobe lights should be used at night, and these should be the minimum number, minimum intensity, and minimum number of flashes per minute (longest duration between flashes) allowable by the FAA. The use of solid red or pulsating red warning lights at night should be avoided. Current research indicates that solid or pulsating (beacon) red lights attract night-migrating birds at a much higher rate than white strobe lights. Red strobe lights have not yet been studied.

Response: Based upon the Preliminary Engineering Report prepared for this project, the proposed communication tower must be designed to accommodate the FAA Standard AC 70/7460-1K for Tower Lighting.

6: Tower designs using guy wires for support which are proposed to be located in known raptor or waterbird concentration areas or daily movement routes, or in major diurnal migratory bird movement routes or stopover site, should have daytime visual markers on the wires to prevent collisions by these diurnally moving species.

Response: The proposed tower will not contain guyed wires. The Proposed Action will consist of free standing 275-foot lattice tower.

7: Towers and appendant facilities should be sited, designed and constructed so as to avoid or minimize habitat loss within and adjacent to the tower “footprint”. However, a larger tower footprint is preferable to the use of guy wires in construction. Road access and fencing should be minimized to reduce or prevent habitat fragmentation and disturbance, and to reduce above ground obstacles to birds in flight.

Response: The site consists of a shell parking lot and maintained lawn. The 529 sq. ft. tower footprint will be adjacent to the new EOC building that is currently under construction.

8: If significant numbers of breeding, feeding, or roosting birds are known to habitually use the proposed tower construction area, relocation to an alternate site is recommended. If this is not

an option, seasonal restrictions on construction may be advisable in order to avoid disturbance during periods of high bird activity.

Response: Significant numbers of breeding, feeding, or roosting birds are not known to habitually use the proposed tower construction area. As previously mentioned, this area is within the developed community of Hahnville located on the EOC property. The EOC property consists of existing buildings, concrete slabs, and regularly mowed turf-grass. Relocation to an alternate site is not a viable option for the proposed project. The location of the proposed project is the most viable location for antenna height and space for emergency services. It is recommended that potential project disturbances, including noise, be minimized and, if possible, be scheduled to occur outside of periods of high bird activity.

9: In order to reduce the number of towers needed in the future, providers should be encouraged to design new towers structurally and electrically to accommodate the applicant/licensee's antennas and comparable antennas for at least two additional users (minimum of three users for each tower structure), unless this design would require the addition of lights or guy wires to an otherwise unlighted and/or unguyed tower.

Response: The proposed 275 foot freestanding tower is designed for future enhancements to mission critical hardware. It will accommodate tower assets including antennae for multiple VHF communications frequencies, parabolic antennae for microwave backhaul radios systems, security cameras to monitor critical navigation points on the Mississippi River from MM 155 – 157 AHP and point-to-multipoint devices to accommodate connectivity to MDA field devices. The tower will be primarily utilized by emergency service entities.

10: Security lighting for on-ground facilities and equipment should be down-shielded to keep light within the boundaries of the site.

Response: Security lighting is not needed because ground facilities and equipment are not proposed for this project.

11: If a tower is construction or proposed for construction, Service personnel or researchers from the Communication Tower Working Group should be allowed access to the site to evaluate bird use, conduct dead-bird searches, to place net catchments below the towers but above the ground, and to place radar, Global Positioning System, infrared, thermal imagery, and acoustical monitoring equipment as necessary to assess and verify bird movements and to gain information on the impacts of various tower sizes, configurations, and lighting systems.

Response: It is recommended that Service personnel or researchers from The Communication Tower Working Group coordinate with the property owner, tower owner and local security and emergency service entities prior to accessing the proposed site.

Towers no longer in use or determined to be obsolete should be removed within 12 months of cessation of use.

Response: The proposed project is for a new 275-foot tower. The site does not contain any prior tower structures or equipment.

13 Historic Properties

Under the No Action alternative, there would be no short- or long-term impacts to historic properties.

Section 106 of the National Historic Preservation Act of 1966 (NHPA, 16 U.S.C. §§ 470 *et seq.*) and its implementing regulations, “Protection of Historic Properties” (36 CFR Part 800), require federal agencies to take into account the effects of their undertakings on historic properties.

According to information on the National Register Information System (NRIS;

<http://nrhp.focus.nps.gov>); the National Register of Historic Places (NRHP;

<http://www.cr.nps.gov/nr>); and the Louisiana Cultural Resources GIS Map

(<http://crt.state.la.us/hp>) websites, no known archaeological resources are located within the area

of potential effect (APE) for Direct Effects, which is the 2,500 square-foot footprint of the proposed tower, or the APE for Visual Effects, which is a .75 mile radius from the proposed tower.

However, there are 7 historical resources in St. Charles Parish listed on the National Register of Historic Places. Of those listed, none lie within the boundaries of the project APE for Direct Effects. Three historical resources, Sites 16SC19, 16SC21, and 16SC22, are depicted on the on-line Louisiana Cultural Resources GIS System within the .75mile APE for Visual Effects (Appendix B).

Site 16SC19 is identified as Keller Plantation, also known as Homeplace Plantation, which is approximately 4,000 feet northwest of the proposed project area. Site 16SC19 is listed in the National Register of Historic Places. This site will not be impacted by the construction of the tower due to the distance from the site and the level of development between the site and the APE.

Site 16SC21, listed as the Lehmann House and located approximately 2,000 feet southwest of the proposed project area, consisted of a 1 ½ story house which was leveled in 1954. The site will not be impacted by the construction of the tower due to the removal of the house in 1954.

Site 16SC22, located 2,000 feet southwest of the proposed project area, consisted of a house occupied by Zachary Taylor’s son, Richard Taylor. The house was destroyed by Union forces in 1862 and a historic marker is currently located at the site of the former house. The site will not be impacted by the construction of the tower due to the removal of the house in 1862.

In response to a letter dated March 2, 2011, The Louisiana Department of Culture, Recreation, and Tourism, Office of Cultural Development indicated on March 31, 2011, that No known historic properties will be affected by this undertaking (Appendix C). Therefore, the Proposed Action will not impact historic properties.

In the event that archeological deposits, including any Native American pottery, stone tools, bones, or human remains, are uncovered, the project shall be halted and the applicant shall stop all work immediately in the vicinity of the discovery and take reasonable measures to avoid or minimize harm to the finds. All archeological findings will be secured and access to the sensitive area restricted. The applicant will inform FEMA immediately, FEMA will consult with the SHPO or THPO, and Tribes and work in sensitive areas cannot resume until consultation is completed and appropriate measures have been taken to ensure that the project is in compliance with the National Historic Preservation Act.

14 American Indian/Religious Sites

Under the No Action alternative, there would be no short- or long-term impacts to American Indian Tribes or Religious Sites.

Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, “Protection of Historic Properties” (36 CFR Part 800) and the Nationwide Programmatic Agreement on the Collocation of Wireless Antennas (adopted March 16, 2001), as well as the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission effective March 7, 2005, require consultation with Native American tribal groups and native Hawaiian organizations (NHO) regarding proposed projects and potential impacts to Native American religious sites.

To identify Indian tribes that may have cultural interest in the area of the proposed undertaking, Saint Charles Parish’s consultants contacted the FCC’s online Tower Construction Notification System (TCNS) to initiate tribal participation. Approximately thirty-one days after the “Notice of Organizations Which Were Sent Proposed Tower Construction Notification Information,” Saint Charles Parish’s consultants issued follow-up letters to tribes that had set geographic preferences on TCNS and that had not responded to the initial TCNS notification. Tribes were also sent letters, faxes, and/or e-mails to address specific information requests. If Tribes did not respond within approximately 10 days of the follow-up letter Saint Charles Parish’s consultants utilized TCNS to refer the tribes to FCC for government to government consultation. The Tribes contacted have either stated that there is no adverse impact or have chosen to not respond to the project; therefore, in accordance with the FCC Declaratory Ruling FCC 05-176, the Tribal participation process is considered complete.

Specific tribal notification information/dates are as follows:

TCNS Notification ID number: 72591

TCNS FCC Initial Notification Date: January 18, 2011

Follow-up Letters Dated: February 17, 2011

TCNS FCC Referral / Final Notice Date: N/A

TCNS FCC Referral / Final Notice to Tribes Date: N/A

The following groups were contacted: Alabama-Coushatta Tribe of Texas, Coushatta Indian Tribe, Chitimacha Tribe of Louisiana, Mississippi Band of Choctaw Indians, Choctaw Nation of

Oklahoma, Seminole Nation of Oklahoma, Tunica-Biloxi Indians of Louisiana, and Kialegee Tribal Town. All of the groups indicated by letter, email or by telephone contact that they had no interest in the site (Appendix D).

Summary Results:

- The Alabama-Coushatta Tribe of Texas: Responded by indicating they did not have any interest in the Proposed Action.
- The Coushatta Indian Tribe: Did not provide a response 30 days after they received notification.
- Chitimacha Tribe of Louisiana: Did not provide a response 30 days after they received notification.
- Mississippi Band of Choctaw Indians: Did not provide a response 30 days after they received notification.
- Choctaw Nation of Oklahoma: Did not provide a response 30 days after they received notification. Per FCC guidelines, the Choctaw Nation of Oklahoma only requires TCNS notification.
- Seminole Nation of Oklahoma: Did not provide a response 30 days after they received notification. Per FCC guidelines, the Seminole Nation of Oklahoma only requires TCNS notification.
- Tunica-Biloxi Indians of Louisiana: Did not provide a response 30 days after they received notification.
- Kialegee Tribal Town: Did not provide a response 30 days after they received notification. Per FCC guidelines, the Kialegee Tribal Town only requires TCNS notification.

In the event that archeological deposits, including any Native American pottery, stone tools, bones, or human remains, are uncovered, the project shall be halted and the applicant shall stop all work immediately in the vicinity of the discovery and take reasonable measures to avoid or minimize harm to the finds. All archeological findings will be secured and access to the sensitive area restricted. The applicant will inform FEMA immediately, FEMA will consult with the SHPO or THPO, and Tribes and work in sensitive areas cannot resume until consultation is completed and appropriate measures have been taken to ensure that the project is in compliance with the National Historic Preservation Act.

15 Air Quality

Under the No Action alternative, there would be no short- or long-term impacts to air quality.

The Clean Air Act (CAA) was established in 1970 (42 U.S.C. § 7401 *et seq.*) to reduce air pollution nationwide. The US Environmental Protection Agency (EPA) has developed primary and secondary National Ambient Air Quality Standards (NAAQS) under the provisions of the CAA. The EPA classifies the air quality within an air quality control region (AQCR) according to whether the region meets or exceeds federal primary and secondary NAAQS. An AQCR or a portion of an AQCR may be classified as being in attainment, non-attainment, or it may be

unclassified for each of the seven criteria pollutants (carbon monoxide, lead, nitrogen dioxide, coarse particulates, fine particulates, ozone, and sulfur dioxide). The proposed project area is “in attainment” for the listed air quality standards.

Short-term impacts to air quality such as exhaust emissions from equipment, and dust from grading activities may occur during site construction activities. Equipment used for these activities would meet local, state, and federal requirements for air emissions, and dust would be controlled as necessary by wetting the surface of the work areas. The emergency generator will produce negligible adverse air emissions as the use of the generator will be use only during power interruptions (short-term) and the generator utilizes propane which produces only minor emissions. Therefore, the Proposed Action would have no significant impact to air quality.

16 Noise

Under the No Action alternative, there would be no short- or long-term impacts to noise.

Noise is generally described as unwanted sound. Sound becomes unwanted when it either interferes with normal activities such as sleeping, conversation, or disrupts or diminishes one’s quality of life. Short-term noise generation is anticipated to result from grading and construction activities. However, site construction will be limited the daytime hours. Noise from the emergency generator would occur only during power interruptions which would be short-term in nature. Therefore, the Proposed Action would not generate significant noise.

17 Infrastructure, Utilities, Transportation, and Waste Management

Under the No Action alternative, there would be no short- or long-term impacts to infrastructure, utilities, transportation, and waste management.

There may be an increase of traffic during the tower construction. Following construction, routine traffic to and from the site would be minimal and would be associated with operations, maintenance, and repair of equipment and the active EOC at the site. Minimal waste would be generated at the site during tower maintenance activities. All waste generated at the site would be disposed of in compliance with federal, state, and local regulations. Therefore, the Proposed Action will not impact infrastructure, utilities, transportation, or waste management.

18 Socioeconomic Concerns

Under the No Action alternative, there would be long-term impacts socioeconomic because a new regional communications tower is needed in St. Charles Parish to improve public safety and

interoperable communications amongst multiple agencies and emergency responders during emergency events.

Executive Order 12898 states “To the greatest extent practicable and permitted by law, and consistent with the principles set forth in the report on the National Performance Review, each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States and its territories and possessions, the District of Columbia, the Commonwealth of Puerto Rico, and the Commonwealth of the Mariana Islands.”

No significant adverse impacts to socioeconomic resources, economic development, demographics, demand for public housing, or public services are anticipated. In addition, there would be no adverse effects on minority or low-income populations. The Proposed Action would benefit all populations in the project service area by providing better communications between emergency responder personnel.

19 Cumulative Impacts

Cumulative impacts are an incremental impact on either the natural environment or human environment by an action when added to past and anticipated future actions. No ongoing or proposed actions are known for the project area. According to information available through the FCC Antenna Structure Registration (ASR) System internet website, there are three thousand eight hundred and six (3,806) registered towers in the state of Louisiana (generally only those towers over 200 feet in height are included in this database).

The proposed construction of the communications tower would not have cumulative impacts on geology, soil, seismicity, water resources, wetlands, floodplains, coastal resources, wild and scenic rivers, threatened or endangered species, historic properties, American Indian or religious sites, air quality, noise, infrastructure, utilities, transportation, or waste management, or socioeconomic resources. Positive long-term impacts to socioeconomic and environmental justice are anticipated since the project will provide better emergency support to the community. During the construction period, short-term impacts to soils, air quality, water quality, waste management, noise, traffic, and health and safety are anticipated.

Table 1. Summary of Impacts				
Resource	No Impact	No Significant Impact	Significant Impact	Mitigation/Best Practices
Soils, Geology, and Seismicity		X		BMPs such as, biodegradable barriers such as hay bales will be utilized.
Water Resources		X		BMPs such as, biodegradable barriers hay bales will be utilized.
Wetlands	X			None
Floodplain	X			None
Coastal Resources	X			None
Wild and Scenic Rivers	X			None
Threatened and Endangered Species and Critical Habitat	X			None
Migratory Birds		X		The tower will not utilize guy-wire and will be located in an existing parking lot.
Historic Properties	X			None
American Indian/Religious Sites	X			None
Air Quality		X		Minimal emissions from generator and construction equipment during construction
Noise		X		Site construction will only occur during the daytime hours. Noise from the emergency generator would occur only during power interruptions which would be short-term in nature.
Infrastructure, Utilities, Transportation, and Waste Management	X			None
Socioeconomic Concerns	X			None

20 Public Involvement

The availability of this EA will be advertised by public notice in the regional newspaper, *The Times-Picayune*. Copies of the EA will be available locally at the Saint Charles Parish East Regional Library. The public comment period will extend for a period of fifteen days. The EA

can also be viewed and downloaded from FEMA's website at <http://www.fema.gov/plan/ehp/envdocuments/ea-region6.shtm>. If no substantive comments are received, the EA will become final and the initial public notice will also serve as the final public notice. The EA will then be archived on FEMA's website at <http://www.fema.gov/library/>.

21 List of Preparers

Holly Fonseca, Grants Officer, St. Charles Parish

Private Sector Contributors

Terracon Consultants, Inc

Government Contributors

Kevin Jaynes, CHMM, Regional Environmental Officer, FEMA Region 6

Alan Hermely, Environmental Specialist, FEMA Region 6

22 Informational Sources

Completion of this Draft Environmental Assessment included using the following resources:

1. NEPA Land Use Compliance Report and NEPA Checklist prepared by Terracon Consultants, Inc., April 7, 2011, Project No. 94117114
2. Phase I Environmental Site Assessment prepared by Terracon Consultants, Inc., January 26, 2011, Project No. EH117010
3. FEMA Draft Tiered Site-Specific Environmental Assessment for St. Charles Emergency Operations Center prepared by FEMA, April 2011, Project No.2008-EO-T8-0010
4. Louisiana Geological Survey
<http://www.lgs.lsu.edu/>
5. United States Department of Agriculture Soil Conservation Service
http://soildatamart.nrcs.usda.gov/manuscripts/LA089/0/la_st.charles.pdf
6. National Wetlands Inventory
<http://www.fws.gov/wetlands/>
7. FEMA Flood Insurance Rate Map (FIRM)
<http://msc.fema.gov/webapp/wcs/stores/servlet/FemaWelcomeView?storeId=10001&catalogId=10001&langId=-1>
8. Louisiana Department of Natural Resources
<http://dnr.louisiana.gov/index.cfm?md=pagebuilder&tmp=home&pid=85&ngid=5>
9. National Wild and Scenic Rivers
<http://rivers.gov/>
10. U.S. Fish & Wildlife Service Species Report
http://ecos.fws.gov/tess_public/countySearch!speciesByCountyReport.action?fips=22089
11. U.S. Fish & Wildlife Service Critical Habitat Report
<http://criticalhabitat.fws.gov/crithab/>

12. Historic Properties

- a. National Register Information System
<http://nrhp.focus.nps.gov/natregsearchresult.do?briefnav&briefpage=1>
- b. National Register of Historic Places
<http://www.nps.gov/history/nr/travel/louisiana/sitelist.htm>
- c. Louisiana Cultural Resources GIS Map
<http://crt.state.la.us/hp/>
- d. FCC Antenna Structure Registration System
http://wireless2.fcc.gov/UlsApp/AsrSearch/asrRegistrationSearch.jsp;JSESSIONID_ASRSEARCH=DGcMTxtfQNLVXbJTNZpLWWGPh3SVLJW7GWflwnrXnS3n71HM8pxg!1840754471!NONE

Appendix A
Site Photographs and Site Plan



Aerial Photo

Photographic Log
Terracon Project Number EH117010
Date Photos Taken: January 20, 2010

Terracon



Photo #1 View of site facing west. Site extends from concrete at right to left of photo and from gravel in foreground to gray car at center.



Photo #2 View of site facing east with adjacent parked car and Mississippi River levee beyond.



Photo #3 View of site facing north with the adjacent Madere's Garage beyond.



Photo #4 View of site facing south with adjacent new construction beyond.

Appendix B
Site Location Maps



Communications Tower
Proposed Location

Project No.	
Scale:	1" = 600'
Source:	USDA
Date:	10/31/2006

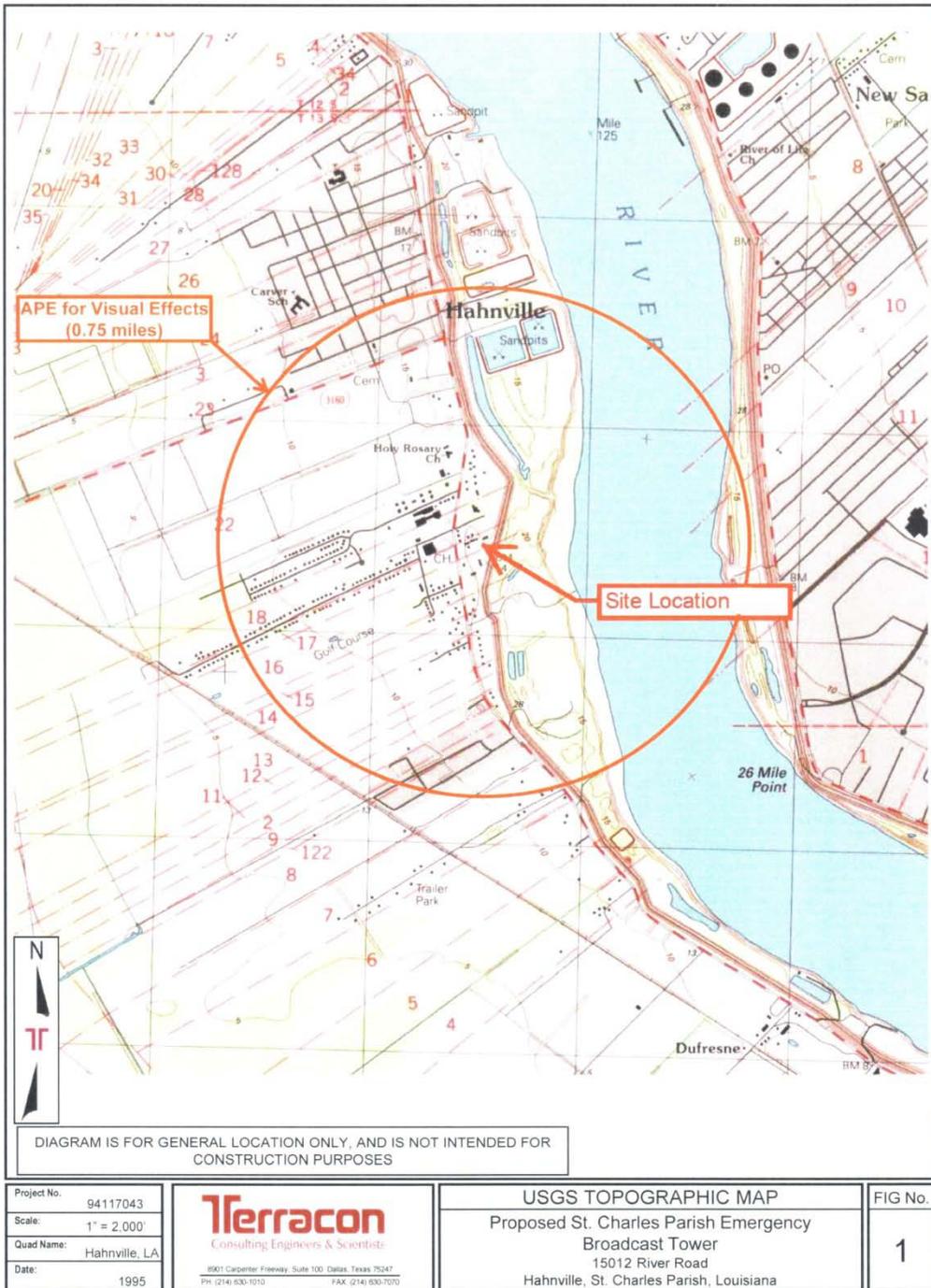
Terracon
Consulting Engineers & Scientists

8901 Carpenter Freeway, Suite 100, Dallas, Texas 75247
PH: (214) 636-7070 FAX: (214) 636-7070

AERIAL PHOTOGRAPH
Proposed St. Charles Parish Telecommunications Tower
120 American Bank
Hahnville, St. Charles Parish, Louisiana

FIG No.
N/A

Regional Area Map



Site Location with .75 Mile Impact Area



U.S. Fish and Wildlife Service
National Wetlands Inventory

St. Charles Parish
Communications
Tower

Jan 18, 2012



Wetlands

- Freshwater Emergent
- Freshwater Forested/Shrub
- Estuarine and Marine Deepwater
- Estuarine and Marine
- Freshwater Pond
- Lake
- Riverine
- Other

Riparian

- Herbaceous
- Forested/Shrub

Status

- Digital
- Scan
- Non-Digital
- No Data

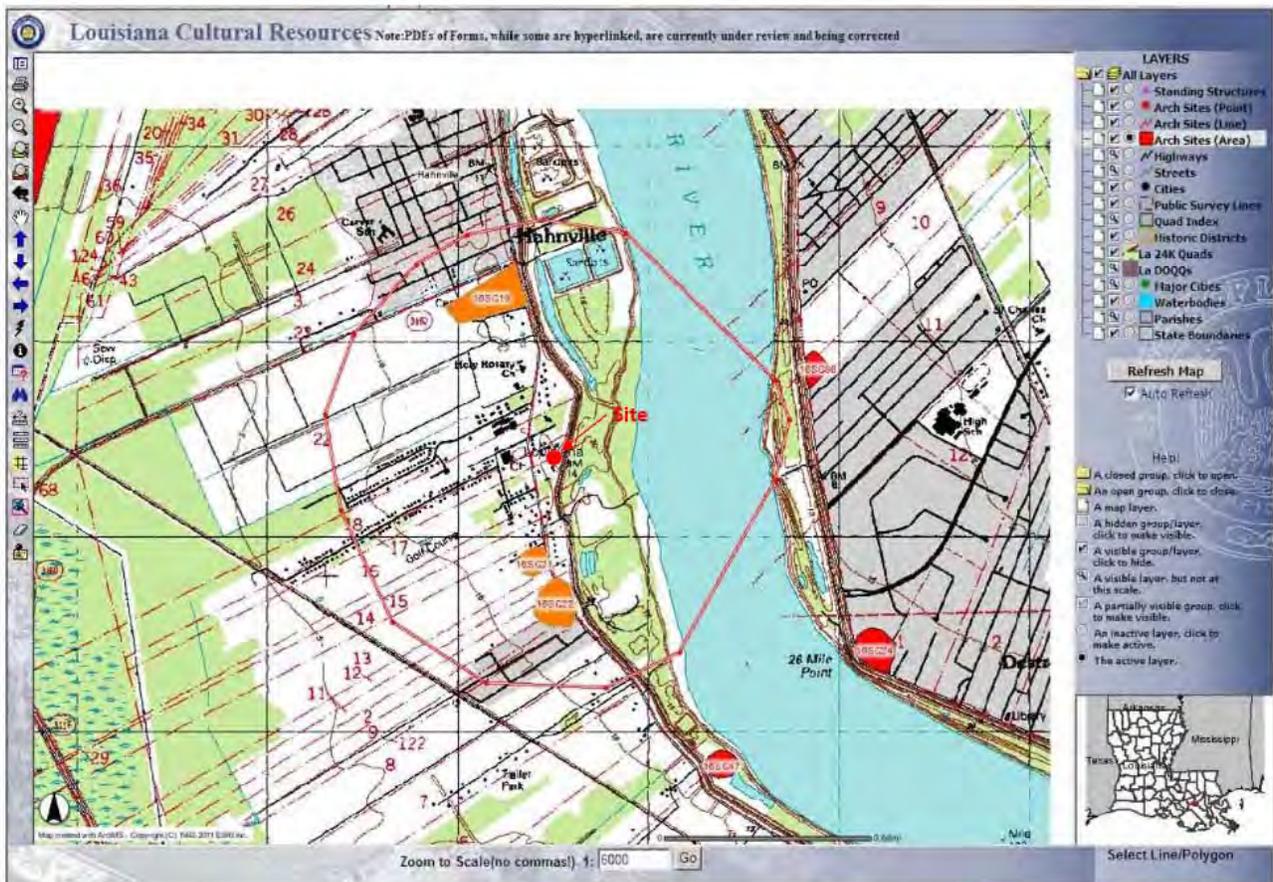
This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

User Remarks:

U.S. Fish and Wildlife Service
National Wetlands Inventory Map

Group	Name	Population	Status	Lead Office	Recovery Plan Name	Recovery Plan Stage
Birds	Brown pelican (Pelecanus)	except U.S. Atlantic coast, FL,	Recovery	Ventura Fish And Wildlife Office		
Birds	Sprague's pipit (Anthus)		Candidate	North Dakota Ecological		
Fishes	Gulf sturgeon (Acipenser)		Threatened	Panama City Ecological	Gulf Sturgeon	Final
Fishes	Pallid sturgeon (Scaphirhynchus)		Endangered	Yellowstone River Coordinator	Pallid Sturgeon	Final
Mammals	West Indian manatee		Endangered	North Florida Ecological	Recovery Plan Puerto Rican	Final
Mammals	West Indian manatee		Endangered	North Florida Ecological	Florida Manatee Recovery Plan,	Final Revision 3
Mammals	Louisiana black bear (Ursus)		Threatened	Louisiana Ecological Services	Louisiana Black Bear	Final

U.S. Fish & Wildlife Service
Species Report
St. Charles Parish, Louisiana



Louisiana Cultural Resources Map

Appendix C
Agency Consultation Letters



March 2, 2011

Louisiana Division of Historical Preservation
Office of Cultural Development
Attn: Michael Varnado
Architectural Historian
PO Box 44247
Baton Rouge, LA 70804

Telephone: (512) 463-6100

RE: Cultural and Historical Resources Review
Proposed Communications Tower
15012 Highway 18
Hahnville, St. Charles Parish, Louisiana 70057
Terracon Project No: 94117114

No known historic properties will be affected by this undertaking. This effect determination could change should new information come to our attention.

Phil Boggan 3-31-11
Phil Boggan Date
Deputy State Historic Preservation Officer

Mr. Varnado:

This letter is in response to your email dated January 31, 2011 requesting further information on the project and to request your review of cultural and historical resources which may be associated with this site as it pertains to FCC clearance. The FCC TCNS notification number is 72591. In addition, we are requesting your review of the references site as per the National Registry of Historic Places process and comment regarding negative impacts, which may be a concern of the State Historic Preservation Officer (SHPO). The project area is located on the enclosed map. The proposed project consists of construction of one: 250-foot tall lattice tower located at 15012 Highway 18 in Hahnville, St. Charles Parish, Louisiana. The site is located on a gravel parking area/driveway.

Enclosed is a copy of the FCC Form 620 and includes, site photographs, a topographic map, and aerial photographs.

It would be greatly appreciated if either a written, facsimile, or verbal response could be received by March 31, 2011. If you are aware of any other state or local agency that may have additional information concerning these issues either on or near the subject site, I would appreciate getting their name and telephone number. If you have any questions or require clarification, please contact me at (214)630-1010.

Sincerely,

Patrick Jacobs
Patrick Jacobs
Natural Resources Specialist

MAR - 7 - 2011

Attachment: Form 620



Terracon Consultants, Inc. 8901 Carpenter Freeway, Suite 100 Dallas, Texas 75247 Registration No. F-3272
P (214) 630 1010 F (214) 630 7070 terracon.com

Geotechnical ■ Environmental ■ Construction Materials ■ Facilities

DEPARTMENT OF NATURAL RESOURCES
OFFICE OF COASTAL MANAGEMENT
P.O. BOX 44487
BATON ROUGE, LOUISIANA 70804-4487
(225) 342-7591
1-800-267-4019

COASTAL USE AUTHORIZATION/CONSISTENCY DETERMINATION

C.U.P No.: **P20101204**
NAME : **ST. CHARLES PARISH GOVERNMENT**
ST. CHARLES PARISH GOVERNMENT
P.O. BOX 44487
HAHNVILLE, LA 70804
LOCATION: **Saint Charles Parish, LA**
Lat. 29° 57' 47"N, Long. 90° 24' 19"W; Sections 16 & 17, T13S-R20E; 15045
Highway 18, Hahnville, LA
DESCRIPTION: Construction of three (3) buildings (Department of Motor Vehicles, File Storage Building and Emergency Operations Center) including all infrastructure, detention and parking, and a communications tower for St. Charles Parish Government.
Approx. 528 cu. yds. of native material will be excavated and hauled off site.
Approx. 5,273 cu. yds. of sand and 2,026 cu. yds. of concrete will be required for project activities. No other excavation or fill will be required.

Pursuant to the State and Local Coastal Resources Management Act of 1978, as amended (La. R.S. 49:214.34.A), the proposed activity is exempt and a Coastal Use Permit is not required.

This determination is valid for two (2) years from the date of this letter. If the proposed activity is not initiated within this two year period, this determination will expire. The applicant will notify the Office of Coastal Management of the date on which initiation of the proposed activity began by entering a commencement date through the online system, or by mailing said information to OCM. Initiation does not include preparatory activities, such as movement of equipment onto the Coastal Use site, expenditure of funds, contracting out of work, or performing activities which by themselves do not require a permit. In addition, Permittee must, in good faith and with due diligence, reasonably progress toward completion of the project once the Coastal Use has been initiated.

This determination has been made on the basis of information provided by your application. If it is later established that you furnished erroneous data, you may be directed to alter or modify your plans, to remove structures you have installed, and/or to restore the work area to pre-project conditions at your own expense. If it is established that you knowingly furnished erroneous data, you could also be subject to legal action.

This determination does not eliminate the need to obtain a permit from the United States Army, Corps of Engineers or any other Federal, state or local approval that may be required by law. The drawings submitted with your referenced application are attached hereto and made a part of the record. If you have any questions regarding this authorization, please contact our office (225) 342-7591 or (800) 267-4019.

***** End of Determination *****

P20101204

ST. CHARLES PARISH GOVERNMENT

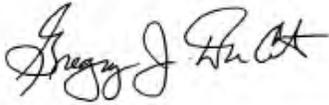
09/30/2010

Page 2 of 3

By accepting this determination the applicant agrees to its terms and conditions.

I affix my signature and issue this determination this 30th day of September, 2010.

DEPARTMENT OF NATURAL RESOURCES



Greg Ducote, For Karl L. Morgan, Acting Administrator
Office of Coastal Management

This agreement becomes binding when signed by the Administrator of
the Office of Coastal Management Permits/Mitigation Division, Department of Natural Resources.

Attachments



P20101204

09/30/2010

Page 3 of 3

Final Plats:

- 1) [P20101204](#) [Final Plats](#) 09/17/2010

cc: Pete Serio, COE w/attachments
Dave Butler, LDWF w/attachments
Johan Forsman, DHH w/attachments
Peggy Rooney, OCM w/attachments
Kirk Kilgen, OCM/FI w/attachments



LBLD

LAFORCHE BASIN LEVEE DISTRICT

COMMISSIONERS

John Boughton
St. James Parish
Leonce Carmouche
Assumption Parish
Joseph Dantin
St. Charles Parish
Dale Dennis, Sr.
Ascension Parish
Stanley Folse
St. James Parish
Robert LeBlanc
Assumption Parish
Russell Loupe
St. Charles Parish
Robert Monti
St. Charles Parish
William Sirmon, Jr.
St. Charles Parish
Warner Sylvain
St. John the Baptist
Wayne Waguespack
St. James Parish

P.O. Box 670 – 21380 Highway 20
Vacherie, LA 70090
(225)265-7545
1-800-827-7034
FAX: (225) 265-7648

May 1, 2012

Mr. Lloyd A. Positerry, II
Principal
Duplantis Design Group, PC
314 East Bayou Road
Thibodaux, Louisiana 70301

Re: Request to Construct the St. Charles Parish Emergency Operations Center, a Generator Enclosure, a Fuel Tank Slab, to Excavate an Existing Ditch and to Construct a Communication Tower on the protected side of the right descending Mississippi River levee, vicinity of second order L.S. 2760+00 Hahnville, Louisiana, St. Charles Parish

Dear Mr. Positerry:

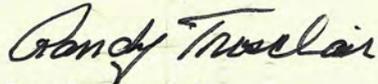
In reference to your original request dated November 4, 2011 and revised drawings dated December 8, 2010, January 4, 2011, February 29, 2012 and provided additional drawings April 12, 2012 and April 18, 2012 relative to the above mentioned subject on behalf of St. Charles Parish Government. This letter will certify that the Board of Commissioner for the Lafourche Basin Levee District has no objections to the proposed work as detailed in your letter, provided:

- 1) The work accomplished is in accordance with the application, emails, drawings and maps provided. Any changes to the limits of scope of the proposed work must be submitted for additional review. The Levee District must be contacted in writing prior to commencement and at the end of activities.
- 2) All excavation work is performed and completed while the stage of the Mississippi River is below elevation + 11.0 feet on the National Geodetic Vertical Datum (NGVD) on the Carrollton gage, at New Orleans, Louisiana. Please call 504-862-2461 or by accessing www.usace.army.mil to get the most current river stages.
- 3) All pile driving work is performed and completed while the stage of the Mississippi River is below elevation + 11.0 feet on the National Geodetic Vertical Datum (NGVD) on the Carrollton gage, at New Orleans, Louisiana. Please call 504-862-2461 or by accessing www.usace.army.mil to get the most current river stages.
- 4) That all provision of our original letter of no objection dated February 10, 2011, is not affected by this revision, and remain effect.
- 5) That no equipment, vehicles, or materials of any kind are parked or stored on the levee or on its slopes.

FURTHER, this letter on no objection does not purport to authorize your entry upon any land, public or private including lands owned by this Board, without first securing from the owner(s) permission to conduct such operations. This letter does not purport to waive the requirements of other governmental and subgovernmental bodies.

APPLICANT agrees to indemnify and save grantor harmless from any and all liability, including liability of grantor to applicant to the no objection offered. APPLICANT further agrees to appear and defend any and all suits instituted against the Board arising out of and/or incident to this letter of no objection and to pay in full any judgment rendered against the Board arising out of and/or incident to this letter of no objection.

**Very truly,
Lafourche Basin Levee District**



**Randy Trosclair
Executive Director**

klv

**cc: Department of the Army
New Orleans, Louisiana**

**Coastal Protection and Restoration
Baton Rouge, Louisiana**

**Holly Fonseca, MBA
St. Charles Parish**

Appendix D
Tribal Notifications

From: Bryant J. Celestine [<mailto:celestine.bryant@actribe.org>]
Sent: Tuesday, March 08, 2011 1:40 PM
To: Jacobs, Patrick
Subject: RE: Tribal Consultation - St. Charles Parish New Tower Site

Dear Mr. Jacobs:

On behalf of Mikko Oscola Clayton Sylestine and the Alabama-Coushatta Tribe, our appreciation is expressed on your efforts to consult us regarding TCNS #72591 in St. Charles Parish.

Our Tribe maintains ancestral associations throughout the state of Louisiana despite the absence of written documentation to completely identify Tribal activities, villages, trails, or burial sites. However, it is our objective to ensure significances of Native American ancestry, especially of the Alabama-Coushatta Tribe, are administered with the utmost considerations.

Upon review of your February 8, 2011 submission, no known impacts to religious, cultural, or historical assets of the Alabama-Coushatta Tribe of Texas are anticipated in conjunction with this proposal. In the event of inadvertent discovery of human remains and/or archaeological artifacts, activity in proximity to the location must cease and appropriate authorities, including our office, notified without delay for additional consultation.

Should you require further assistance, please do not hesitate to contact us.

Sincerely,

Bryant J. Celestine
Historic Preservation Officer
Alabama-Coushatta Tribe of Texas
571 State Park Rd 56
Livingston, Texas 77351
936 - 563 - 1181
celestine.bryant@actribe.org

Terracon provides geotechnical, environmental, construction materials, and facilities consulting engineering services delivered with responsiveness, resourcefulness, and reliability.

Private and confidential as detailed here (www.terracon.com/disclaimer). If you cannot access hyperlink, please e-mail sender.

The information contained in and transferred with this electronic message is intended only for the recipient(s) designated above, is protected by law and may contain information which is privileged and confidential. If you are not the intended recipient, you are hereby notified that any

review, dissemination,
distribution, copying or use of this message is
unauthorized and strictly
prohibited. If you have received this message in error,
please notify the sender
immediately at 504.832.2000. Thank you.

The information contained in and transferred with this electronic message is intended only for the recipient(s) designated above, is protected by law and may contain information which is privileged and confidential. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution, copying or use of this message is unauthorized and strictly prohibited. If you have received this message in error, please notify the sender immediately at 504.832.2000. Thank you.

February 8, 2011



Coushatta Indian Tribe
Attn: Christopher Sylestine
1940 C C Bel Road
Elton, LA 70532

Telephone: (337) 584-1422

RE: Cultural and Historical Resources Review
Proposed Emergency Broadcast Tower
15012 River Road
Hahnville, St. Charles Parish, Louisiana 75902
Terracon Project No: EH117010

Dear Mr. Sylestine:

This letter is to request your review of cultural and historical resources which may be associated with this site. In addition, we are requesting your review of the references site as per the National Registry of Historic Places process and comment regarding negative impacts, which may be a concern of the Tribal Historic Preservation Officer (THPO). The project area is located on the enclosed map. The proposed project consists of construction of a 250-foot tall stand alone emergency broadcast tower located at 15012 River Road in Hahnville, St. Charles Parish, Texas.

Enclosed is a copy of the FCC Form 620 and includes, site photographs, a topographic map, and aerial photographs.

It would be greatly appreciated if either a written, facsimile, or verbal response could be received by February 28, 2011. If you are aware of any other state or local agency that may have additional information concerning these issues either on or near the subject site, I would appreciate getting their name and telephone number. If you have any questions or require clarification, please contact me at (214)630-1010.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrick Jacobs", is written over a horizontal blue line.

Patrick Jacobs
Natural Resources Specialist

Attachment: Form 620

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Coushatta Indian Tribe
 Attn: Christopher Sylestine
 1940 C.C. Bel Rd
 Elton, Louisiana 70532

COMPLETE THIS SECTION ON DELIVERY

- A. Signature: *Bridget Kibler* Agent Addressee
- X *Bridget Kibler* Agent Addressee
- B. Received by (Printed Name) *Bridget Kibler* C. Date of Delivery *2/10*
- D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number (Transfer from service label) *7010 3090 0002 7541 0801*

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Coushatta Tribe of Louisiana
 Attn: Linda Langley
 PO Box 10
 Elton, LA 70532

COMPLETE THIS SECTION ON DELIVERY

- A. Signature: *Linda Langley* Agent Addressee
- X *Linda Langley* Agent Addressee
- B. Received by (Printed Name) C. Date of Delivery
- D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number (Transfer from service label) *7009 2250 0001 6061 2140*

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Tunica-Biloxi Indians of Louisiana
 Attn: Earl Barby
 PO Box 1589
 Marksville, Louisiana 71351

COMPLETE THIS SECTION ON DELIVERY

- A. Signature: *Earl Barby* Agent Addressee
- X *Earl Barby* Agent Addressee
- B. Received by (Printed Name) *Earl Barby* C. Date of Delivery
- D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number (Transfer from service label) *7003 2260 0003 2378 6049*



From: Jacobs, Patrick
Sent: Thursday, May 31, 2012 2:18 PM
To: 'choctawhp@gmail.com'
Subject: TCNS # 72591

Mr. Carleton,

This e-mail is in reference to a TCNS submittal (TCNS # 72591) from February 2011. I never received a response on the notification and wanted to see if you had any record of receiving the request and documentation. The TCNS systems states that the Mississippi Band of Choctaw Indians does not have interest in the project if there is no response within 30 days of the email. If you have received the email from 2011 please let me know.

Thanks

Patrick Jacobs
Natural Resources Specialist | Dallas Environmental
Terracon
8901 Carpenter Frwy | Dallas, TX 75247
P 214-630-1010 | F 214-630-7070 | M 214-315-2306
wpjacobs@terracon.com | www.terracon.com

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February 8, 2011

Tunica-Biloxi Indians of Louisiana
Attn: Earl Barby
PO Box 1589
Marksville, LA 71351

Telephone: 318.253.8174 x 6451

RE: Cultural and Historical Resources Review
Proposed Emergency Broadcast Tower
15012 River Road
Hahnville, St. Charles Parish, Louisiana 75902
Terracon Project No: EH117010

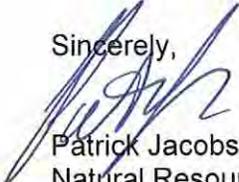
Dear Mr. Barby:

This letter is to request your review of cultural and historical resources which may be associated with this site. In addition, we are requesting your review of the references site as per the National Registry of Historic Places process and comment regarding negative impacts, which may be a concern of the Tribal Historic Preservation Officer (THPO). The project area is located on the enclosed map. The proposed project consists of construction of a 250-foot tall stand alone emergency broadcast tower located at 15012 River Road in Hahnville, St. Charles Parish, Texas.

Enclosed is a copy of the FCC Form 620 and includes, site photographs, a topographic map, and aerial photographs.

It would be greatly appreciated if either a written, facsimile, or verbal response could be received by February 28, 2011. If you are aware of any other state or local agency that may have additional information concerning these issues either on or near the subject site, I would appreciate getting their name and telephone number. If you have any questions or require clarification, please contact me at (214)630-1010.

Sincerely,



Patrick Jacobs
Natural Resources Specialist

Attachment: Form 620

