

**Louisiana Local Coastal Management Programs**

**Periodic Review**

**July 1, 2016 to June 30, 2018**



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## INTRODUCTION

The state and federally approved Louisiana Coastal Resources Program (LCRP) includes twelve (12) approved and operating parish Local Coastal Management Programs (LCMPs). Parishes with state and federally approved programs include: Calcasieu, Cameron, Jefferson, Lafourche, Orleans, Plaquemines, St. Bernard, St. Charles, St. James, St. John the Baptist, St. Tammany and Terrebonne. The Interagency Affairs Section (IA) of the Interagency Affairs and Field Services Division (IAFSD) of the Office of Coastal Management (OCM) of the Louisiana Department of Natural Resources (LDNR) has conducted a periodic review of eleven of the operating Louisiana LCMPs for the time period of July 1, 2016 to June 30, 2018.

In addition to the eleven previously approved LCMPs, OCM recently approved St. John the Baptist Parish to begin operation of a LCMP. St. John the Baptist Parish began operation as a LCMP on July 1, 2018 immediately subsequently to this report's review period. Therefore, the St. John the Baptist Parish LCMP is not evaluated in this period's review.

## REVIEW METHODOLOGY

Per L.A.C. 43:1.725.F, a periodic review of each program is required at least every two years. The periodic review includes an analysis of existing parish coastal zone management (CZM) ordinances and other coastal zone regulations, coastal use permitting procedures and processes, and other information pertinent to the approved parish programs. The purpose of the periodic review process is threefold:

1. to ensure that the local program operation remains consistent with the federally approved state program,
2. to ensure that the local program is operating in such a manner as to achieve the objectives spelled out in the parish LCMP Programmatic Document, and
3. to help the state and the parishes to further improve in their missions to successfully manage the state's and parishes' coastal resources.

The periodic review process for each LCMP consists of the following components:

- Several items are audited for each parish: previous periodic review findings; contract files and other deliverables for each individual parish program; database queries of local concern applications for each parish to ascertain specific parish determination decisions, types and extent of various habitat impacts, and the appropriate mitigation assessments; samples of the individual parish's permit files; enforcement files and the corresponding after-the-fact permits; parish ordinances and protocols; as well as, any other changes or improvements implemented during the review period.
- IA requested that each LCMP submit a report prior to the review date detailing program administration, permitting issues, program and contract documentation, interagency coordination, and if the parish has any requests or comments to the state program.
- Periodic review meetings were held at all eleven LCMP parish offices, and were attended by representatives of the parish LCMP and two or more OCM staff members, including: Charles Reulet, Sara Krupa and/or Jon Truxillo. OCM presented the findings of the audit processes and asked questions regarding the LCMP procedures of the LCMP personnel at the meeting. The format of these meetings allowed for public attendance and participation.
- The findings of this periodic review report are forwarded to the LCMPs. In addition, they are forwarded to the National Oceanic and Atmospheric Administration (NOAA) as part of OCM's

regular reporting process. They are also made public via email and placed on our agency's web page.

## **GENERAL DISCUSSION**

All parish programs, albeit one requiring continuous state program intervention and assistance, were found to be consistent with the state program and their LCMP programmatic documents and other enforceable policies. Appropriate and correct mitigation assessment training remains a top OCM/LCMP priority. The parishes perform assessments and calculations of mitigation compensation for habitat impacts, as well as, prepare the proper documentation that is vital for the state to remain in compliance with the state and federal requirements of the Louisiana Coastal Wetlands Conservation Plan, State Legislative Reports and other local, state and federal reporting requirements. OCM continues to work with the parishes to ensure the proper mitigation sequencing procedures of avoidance and minimization are implemented as essential objectives of the compensatory mitigation process, and that proper data documentation of the sequencing process is credited. All parish programs continue to be receptive towards individualized training in mitigation procedures and assessments and other technical aspects of LCMP operation.

Topics that were discussed with all parish programs included: recommendations made during the last periodic review; parish program administration; parish program enforceable policies; parish permit review processes, protocols, and efficiencies; parish specific permitting issues; parish coordination with other local, state and federal government agencies; future training opportunities and other current coastal management issues such as: coastal community resiliency, nonpoint source pollution control, clean and resilient marina programs, and coastal restoration and enhancement projects.

## **GENERAL FINDINGS**

Eleven of the operating parish LCMPs were found to be consistent with and effective in achieving the objectives of the state and the local programs with only a nominal amount of OCM oversight and assistance. One parish required extensive oversight and corrective actions throughout this report period in order to assure that the LCMP remained operating satisfactorily.

All parish programs:

- Strive to assess appropriate mitigation, with OCM staff assistance; and submit their initial mitigation assessments to OCM's mitigation section for review and to obtain the appropriate compensatory mitigation payment or project options;
- Continue to show improvement in acquiring the technical knowledge necessary to accurately process authorizations;
- Continue to show improvement in potential violation investigation and permit condition monitoring protocols;
- Continue to show improvement in the accuracy and timely data collection, preparation and reporting of permit application and authorization data;
- Continue to show improvement in the technical and biological proficiency required to correctly accomplish field investigations and habitat assessment; and,
- Support OCM in the investigation of long-standing needed field inspection follow-ups and transferred enforcement actions statuses that needed resolution and proper database entries.

Certain parish programs received necessary and/or recommended or suggested action items this periodic review period. These action items serve to improve a LCMP operation or correct any deficiency that may be hindering complete compliance with the state and local programs' enforceable policies. Necessary and suggested action items are discussed in each individual parish's report section.

### **Calcasieu Parish**

The Calcasieu Parish periodic review meeting was held November 15, 2018 in Lake Charles, Louisiana. Representing Calcasieu Parish was the Calcasieu LCMP Administrator, Ms. Laurie Cormier. Ms. Sara Krupa and Mr. Jon Truxillo represented OCM. There were no public comments received by the parish or OCM and no members of the public in attendance.

### **Action Items from Previous Periodic Review 2014/2016**

**Suggested Action Item - The Calcasieu LCMP consistently delivers proper documentation and information, competently addresses questions, and provides timely responses to all requests. One suggested area for improvement for the LCMP would include a thorough review of protocols and procedures with special attention towards technical information in an effort to achieve a greater degree of independence for the LCMP to operate with less OCM oversight.**

Although Calcasieu made improvements in these areas during this report period, the state would recommend that parish personnel continue to make progress in these areas.

### **Parish Requests**

Calcasieu stated they are satisfied with state assistance and had no recommendations for OCM/LCMP coordination improvement. Calcasieu LCMP provides comments on uses of state concern when they feel it is appropriate and they are satisfied with the state's replies to their concerns. Calcasieu LCMP requested continued assistance with field investigations and wetland plant identification. OCM will continue to provide individualized assistance, as well as, classes in wetland habitat and plant species for all twelve approved LCMPs.

### **Program Administration**

Laurie Cormier continues to serve as the LCMP Administrator and she utilizes 60% of her time for those duties. The other 40% of time she is dedicated as a Hazard Mitigation Consultant. Ms. Cormier serves on the Coastal Protection and Restoration Authority (CPRA) Board and is co-chair of the Environmental Committee. Ms. Jennifer H. Cobian, Ms. Amber Downs, and Ms. Natasha Willis, assist as needed as members of the grants team. The Coastal Advisory Committee consists of the Planning and Zoning Board, and this committee meets once a month.

Calcasieu promulgated a new drainage ordinance this period. The parish adopted a one foot freeboard ordinance on residential structures situated in the x-zone as well as designated flood zones. This will have continued positive effects to local coastal management and will increase the parish's overall coastal community resiliency. Calcasieu also updated their Coastal Management Plan Programmatic Document this period, and OCM and NOAA have approved the updated plan. A copy of the plan can be found at

<http://www.dnr.louisiana.gov/assets/OCM/Interagency/LCP/FINALUpdatedCalcasieuParishCZMPlan030617.pdf>

### **Program Processes and Permit Issues**

There were nine uses of local concern transmitted to the LCMP and eight authorizations issued by the LCMP this review period. The LCMP reviewed 46 uses of state concern. There was one authorization this period that required a one year growing season condition to assess impacts to vegetated wetlands. The parish reviewed the site recovery conditions following one growing season for the one authorization that had been issued a one year season growing condition during the last review period. That site was found to have recovered.

The process for monitoring permit activity is done through periodic site inspections. Calcasieu LCMP inspects and enforces all permit requirements. All local concern applications that are determined to be CUPs were placed on a 30 day public comment period, and all final permit determinations are published in the official parish journal. The results are published on the parish web site for the public to view as well. The LCMP includes Basis of Decision (BOD) documentation in all LCUP permit files. They have established protocols in place for one year growing season conditions and have successfully utilized these protocols for the past two review periods. The parish is prepared to condition permits with any special conditions as needed. There were no enforcement issues this review period. The parish is very progressive in regards to community resiliency and has established procedures for storm water controls and nonpoint source pollution prevention. There were no negative issues with any state or federal resource agencies.

### **LCMP Managers Meetings and Additional Items**

The parish attended all LCMP meetings during the review period. Suggested topics for future meetings would be to highlight protocols and procedures with special emphasis on the technical aspects of permit authorization and review, especially in regards to field investigation and wetland identification procedures. Calcasieu is very active in regards to restoration projects including project partnerships with their neighboring parish partners: Cameron and Vermilion and with the Chenier Plain Coastal Restoration and Protection Authority. Calcasieu also received a Coastal Communities Resiliency Grant from the National Association of Counties to participate in the Strengthening Coastal Counties Resilience Challenge.

This review period Calcasieu continued to work together with OCM on our NOAA-309 Resiliency Task: Improved Flood Protection Analysis Incorporation into Calcasieu Parish's Local Coastal Use Application Review. This period the Community Rating System (CRS) resiliency improvement protocols to be included in the permit review process underwent final development and were put into operation. A monitoring and reporting process was also developed and put into practice. Calcasieu Parish participates in outreach education activities for coastal nonpoint pollution control in several ways: Laurie T. Cormier serves as the Co-Chair for the Environmental Committee through the Chamber of Southwestern Louisiana (SWLA) which hosts a yearly middle school poster contest and high school video contest for pollution control and coastal issues; the Calcasieu Parish Police Jury has a litter control program; and, the parish also has an activity page for kids concerning storm water education.

Calcasieu has one marina in the Louisiana Clean Marina program but does not have immediate plans to certify any more.

### **Permit Decisions**

Calcasieu Parish's permit decisions have been consistent with the state program and its programmatic document. Calcasieu Parish is following the Coastal Use Guidelines and the Calcasieu Coastal Management Plan Programmatic Document when permitting applications for activities in the parish.

Calcasieu is running a very admirable program and Ms. Cormier is to be highly commended for her prompt response to state requests, attention to detail, and overall enthusiastic attitude regarding coastal management efforts.

### **Parish Comments**

Calcasieu Parish is following the Coastal Use Guidelines and Calcasieu Coastal Management Plan Programmatic Documents when permitting applications for the activities in Calcasieu Parish. (Laurie Cormier, LCMP Administrator)

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### **Cameron Parish**

The Cameron Parish review was held on December 12, 2018 in Cameron, Louisiana. Parish personnel present included Mr. Myles Hebert, Certified Building Official and Floodplain Administrator; and Ms. Kara Bonsall, Coastal Management Administrator. Mr. Charles Reulet, and Mr. Jon Truxillo represented OCM at the meeting. There were no public comments received and no members of the public in attendance.

### **Action Items from Previous Periodic Review 2014/2016**

**Necessary Action Item - The Cameron LCMP should work diligently to assure all mitigation that is assessed is in strict compliance with state and parish regulations. Cameron should continue to have all mitigation assessments undergo review by the OCM mitigation section. Cameron should work diligently to achieve substantial coordination with the U.S. Army COE of Engineers (COE) early in the permit application review process.**

All compensatory mitigation this review period was properly assessed and coordinated with OCM and the COE. Cameron continues to work carefully to assure all mitigation is correctly assessed and properly coordinated with the OCM's mitigation section and the COE.

**Recommended Action Item - The Cameron LCMP should work diligently to utilize the new internal procedures established to insure follow up on one year growing season mitigation conditions. OCM developed a new LCMP Field Investigation Form to assist in this endeavor.**

Cameron LCMP appears to have greatly improved in one year growing season mitigation condition re-inspections follow-up procedures. Cameron LCMP assisted OCM in resolving several outstanding one year growing season mitigation condition re-inspections that had remained open until this review period. Cameron LCMP has been utilizing the new LCMP Field Investigation Form. Cameron LCMP further enhanced a computer calendar and card mail-in notification processes this period as well.

### **Parish Requests**

Cameron LCMP did not have any requests for the state program at the periodic review meeting or in the accompanying report. Cameron believes that OCM adequately addresses the parish goals, policies, and objectives when reviewing uses of state concern applications. However, there was one specific instance this report period where the state, at first, did not adequately consider the hardship potentially being imposed upon Cameron regarding a use of state concern CUP. As a result of this instance, the state has made improvements in the coordination procedure with the Cameron Gravity Drainage District in regards to projects determined to be a state concern that may have potential impacts to established parish drainage maintenance right(s)-of-way.

### Program Administration

Kara Bonsall is the Cameron Parish Coastal Zone Administrator. Her job consists of overseeing the program and attending various meetings concerning coastal and wetland issues. Ms. Bonsall makes determinations on LCUP applications and performs the other duties attendant to the LCMP Program. Ms. Bonsall's other job duties consist of issuing development permits, 911 addressing, violation letters, and interpreting Federal Emergency Management Association (FEMA) regulations for the parish. Myles Hebert assists the Coastal Zone Administrator with violations that may occur which includes performing on-site inspections and working closely with Ms. Bonsall on these concerns. He also assists in other LCMP duties as needed including assisting with mitigation when necessary and frequently attends various meetings concerning coastal and wetland issues. Mr. Hebert also is the Certified Building Official and Floodplain Administrator for the parish which consists of performing all building inspections throughout the parish; this requires attending various classes for maintaining continuing education credits. Ms. Bonsall and Mr. Hebert work well together and are extremely knowledgeable about permits and regulations concerning the coastal zone, flood management and development in general.

Cameron Parish has a Coastal Management Committee. The committee consists of the six Drainage Districts, the Coastal Restoration Committee, and the Police Jury. Copies of all state and local concern applications are mailed to the Coastal Management Committee for approval or comments. All information from the committee is sent back to the LCMP. There were no new coastal ordinances adopted this review period.

### Program Processes and Permit Issues

There were 32 uses of local concern transmitted to the LCMP and 22 authorizations issued by the LCMP this review period. The LCMP reviewed 165 uses of state concern. There was one authorization this period that required a one year growing season condition to assess impacts to vegetated wetlands and three authorizations that were assigned compensatory mitigation. The Cameron LCMP properly provides for a 25-day public comment period on local concern applications under review by placing a public notice in the official parish journal. All Police Jury minutes are published in the official parish journal. They include approval and denial of permits in those minutes. Copies of all local concern public notices are promptly emailed to OCM. Cameron LCMP conducts field investigation on all LCUP applications and has greatly improved in the submission of LCMP Investigation Report forms. Most program deliverables and permit application and authorization data is received by OCM from the Cameron LCMP in a timely manner. Permits are conditioned with special conditions as needed. Cameron LCMP includes Basis of Decision documentation in their permit files and has instituted a project initiation and completion card system notification process for work authorized by parish Local Coastal Use Permits. As previously stated all mitigation assessments were very satisfactorily completed this period. There were three permits that had one year growing season conditions in the authorization letters but did not require photos or field investigations, pre and post analyses for compliance. The submitted habitat impacts code sheets for these permits also incorrectly had the mitigation required fields coded as "No" instead of "Waiting".

**Necessary Action Item - The Cameron LCMP shall include all conditions required and submit correct data required concerning growing season conditions in LCUP authorizations and code sheets.**

### LCMP Managers Meetings and Additional Items

Cameron Parish has been represented at all LCMP meetings. Ms. Bonsall and Mr. Hebert are very active in the program, as evidenced by their attendance at the LCMP meetings, various training programs and workshops offered by OCM. Cameron did not have any suggested topics for future LCMP meetings. The

Cameron Parish Coastal Zone Management Program sees OCM to be a great source of information and assistance and finds no particular areas needing change. Cameron LCMP participates in both parish restoration projects and in coastal education and outreach, but has no marinas in the Louisiana Clean Program. They did not identify any viable candidates for the Louisiana Clean Marina Program.

### **Permit Decisions**

Cameron Parish's permit decisions have been consistent with the state program and its programmatic document. Cameron Parish is using the Coastal Use Guidelines and other Cameron Parish enforceable policies when permitting applications for activities in the parish. Ms. Bonsall and Mr. Hebert should be commended for their expertise and professionalism, responsiveness to OCM requests, and for the high quality of program operation.

### **Parish Comments**

Cameron Parish LCMP continues to benefit from OCM, particularly the mitigation assistance that is provided on a much needed basis (Kara Bonsall, LCMP Administrator).

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## **Jefferson Parish**

The Jefferson Parish review was held on December 3, 2018 in Marrero, Louisiana. Ms. Laruen Averill, Coastal Management Administrator, Mr. Jason Smith, Coastal Permit Specialist, and Mr. Seamus Riley, Project Specialist represented the parish. Ms. Sara Krupa and Mr. Jon Truxillo represented OCM at the meeting. There were no public comments received and no members of the public attended.

### **Action Items from Previous Periodic Review 2014/2016**

**Suggested Action Item - Jefferson Parish should continue to improve in the timely submission of code sheets, paying special attention to the prompt submission of the initial code sheets.**

For two previous review periods it was suggested that Jefferson Parish should continue in the prompt submission of adequate and timely documentation and reporting to the state on application processing and authorization data. During this reporting period, Jefferson Parish consistently maintained the timely submission of contract deliverables, and helped OCM address outdated enforcement files, database errors and other inconsistencies from previous periods.

### **Parish Requests**

Jefferson Parish is very satisfied with the state program's assistance. Parish representatives feel that the OCM Local Program Section and Mitigation Section staff, as well as, the OCM Field Biologists are very accommodating. Jefferson LCMP requested additional guidance and/or templates for the Needs Alternatives and Justification (NAJ) and Hydrological Modification Impact Analysis (HMIA) processes, as well as, additional wetland plant identification courses.

### **Program Administration**

This report period Jefferson Parish created a new Jefferson Parish Coastal Management Division within their Public Works Department. Ms. Lauren Averill serves as the Administrator. Ms. Averill manages and oversees all related coastal matters in Jefferson Parish, including: serving on numerous boards and committees, engaging state and federal agencies for funding, and seeking out partnerships to provide coastal restoration to the parish. Mr. Jason Smith continues in the primary handling of all matters related to implementation of the parish LCMP. Mr. Seamus Riley serves as a technical specialist and handles the preparing of grants and meetings, preparing educational outreach and performing permit

tracking. All staff members contribute in implementation of restoration projects and serve in emergency response roles in the event of natural hazards or disasters. Jefferson Parish does not have a Coastal Management Committee. There were no new ordinances adopted this review period.

### **Program Processes and Permit Issues**

There were 49 uses of local concern transmitted to, and 52 authorizations issued by, the LCMP this review period; the LCMP reviewed 156 uses of state concern. There were no authorizations this period that required a one year growing season condition to assess impacts to vegetated wetlands. There were six instances of assigned compensatory mitigation this period properly conducted with appropriate compensation and with excellent coordination with OCM's mitigation section and the proper federal mitigation partners. Jefferson LCMP is to be commended for its outstanding mitigation assessment and coordination process and leads all Louisiana LCMPs in the development of innovative technical procedures developed in regards to compensatory mitigation and permit processing. The Jefferson LCMP maintains a permits database to better track local and state permit applications.

The LCMP provides comments when needed to OCM regarding state concerns. Much of the work performed in Jefferson Parish pertains to making repairs and conducting maintenance activities as a result of several storms. The parish does prefer that wetland impact minimization techniques be employed regarding the laying of new pipelines for uses of state concern. There were no specific cases to report from the LCMP concerning OCM not adequately addressing any concerns and no major issues to report concerning other local, state or federal agencies this review period.

The Jefferson LCMP properly follows all correct public notice procedures. The LCMP utilizes re-inspection rather than photo conditions to follow up on one year growing season conditioned permits. The Jefferson LCMP actively works to avoid and/or minimize adverse impacts during the permitting process. The need for field investigations is determined on a case by case basis. The parish program has well-established procedures for dealing with enforcement cases and does an outstanding job with after the fact permits and requiring the proper mitigation when necessary. The LCMP also has a well-established program in place that informs applicants for other parish permits of all permitting responsibilities on the front end when they apply for any permit in the parish and this greatly reduces the number of enforcement cases.

The LCMP includes a copy of the Basis of Decision documentation in the permit files, and welcomes the assistance of OCM with this task. To date, there are four permit applications with long processing times. One involves issues still unresolved with the COE, one is waiting payment of assessed mitigation, and the remaining two are enforcement issues dealing with unauthorized clearing and filling.

### **LCMP Managers Meetings and Additional Items**

A representative from the Jefferson Parish LCMP has been in attendance at all the LCMP managers meetings this period. The Jefferson LCMP had the following suggestions for future program meetings:

- 1) provide a workshop/demonstration on how to access and use the regulatory In-Lieu Fee and Bank Information Tracking System (RIBITS) to track mitigation payments using existing cases;
- 2) provide a workshop/demonstration on how to fill out habitat benefits code sheets using several examples of cases using the OCM In-Lieu Fee Mitigation Program, and private mitigation banks involving both impacts to forested wetlands and marsh habitats;
- 3) provide a workshop/demonstration on identifying common wetland vegetation within several habitats (bottomland hardwoods, saline marsh, brackish marsh, fresh marsh);

- 4) continued demonstrations on how to use and navigate Strategic On-Line Natural Resources Inventory System (SONRIS) to assist with permit applications and/or restoration activities;
- 5) provide additional workshops focusing on how OCM incorporates best management practices into their permits; and
- 6) provide overview of all current and state approved mitigation banks/areas and have a few of the operated companies speak about how they keep records and monitor the success of the wetland areas.
- 7) Provide a continued training on how to process/review the Hydrologic Modification Impact Analysis (HMIA) and the Needs, Alternatives, and Justification Analysis (NAJ) and do so by incorporating past permitted projects, as well as, include several sample letters pertaining to various scenarios which the coastal programs can use.

Jefferson Parish utilizes the LCMP Handbook and other provided resources and customizes these resources as appropriate for their program's uses. The Jefferson LCMP is involved in numerous coastal restoration projects and education outreach efforts but has no marinas involved in the Louisiana Clean Marina Program, nor can it identify any worthwhile prospects at this time.

### **Permit Decisions**

Jefferson Parish's permit decisions have been consistent with the state program and its programmatic document. Jefferson Parish follows the Coastal Use Guidelines and the Jefferson Programmatic Document when permitting applications for activities in the parish. Jefferson is running an extremely well run and thorough program, especially in regards to technical proficiency and attention to processing details.

### **Parish Comments**

The Jefferson Parish Periodic Review section of the report looks fine. (Jason Smith, Coastal Permit Specialist)

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## **Lafourche Parish**

The Lafourche Parish review was held on November 23, 2018 in Mathews, Louisiana. Ms. Amanda Voisin, Coastal Restoration and Management Administrator and Ms. Lindsey Dufrene, Coastal Permits Coordinator, represented the parish. Ms. Sara Krupa and Mr. Jon Truxillo represented OCM. There were no public comments received and no members of the public in attendance.

### **Action Items from Previous Periodic Review 2014/2016**

**Necessary Action Item - Lafourche Parish LCMP must include Basis of Decision documentation in their LCUP files.**

Lafourche LCMP has been including the necessary Basis of Decision (BOD) documentation in the permit files but has not always been consistent in forwarding the BOD to OCM to upload into the electronic record on LDNR's Strategic On-Line Natural Resources Inventory System (SONRIS). Lafourche committed to forwarding all applicable BOD documentation to OCM at the periodic review meeting.

## Parish Requests

Lafourche Parish expressed that they are satisfied with state program's assistance. State assistance to the parish has always been available whenever needed. Lafourche LCMP stated that they have always received assistance in an efficient manner from the LCMP staff. At this time, there are no specific changes or actions recommended. Lafourche LCMP continued to request training on field investigation procedure and wetland plant identification. OCM will continue to provide this training.

## Program Administration

Amanda Voisin, former Coastal Zone Management (CZM) Permits Coordinator, was promoted to CZM Administrator at the end of the last reporting period. Lindsey Dufrene, former CZM Clerk, was promoted to Coastal Permits Coordinator beginning this period. Ms. Dufrene has assumed the responsibilities of reviewing, processing, and issuing Local Coastal Use Permits and assisting in the management and administrative duties of the LCMP with assistance from Ms. Voisin as needed. Lafourche Parish has a CZM Committee. Currently, there is one vacant spot on the board and they are working to fill the opening. There were no new coastal ordinances or resolutions adopted this period.

Lafourche Parish comments on uses of state concern applications when they include areas of concern for the Lafourche Parish Office of Coastal Zone Management or the CZM Advisory Committee by utilizing the SONRIS comments function. The parish feels that their comments are adequately addressed and there were no specific problem instances.

Coordination and cooperation between Lafourche Parish and LDNR has been very satisfactory this review period. The only resource agency coordination issue occasionally encountered is coordination with the U.S. Corps of Engineers (COE) due to the lengthy timeframe for the COE to issue permits, specifically in regards to permits with mitigation. Because mitigation determinations usually rely on coordination with the COE, LCMP processing times are often greatly increased as a result.

## Program Processes and Permit Issues

There were 24 uses of local concern transmitted to and 24 authorizations issued by the LCMP this review period; the LCMP reviewed 223 uses of state concern. There were two authorizations this period that required one year growing season conditions to assess impacts to vegetated wetlands. There were three instances of assigned compensatory mitigation issued this period properly conducted with proper compensation and with excellent coordination with OCM's mitigation section and the appropriate federal mitigation partners. Lafourche LCMP is again to be commended for its outstanding mitigation assessment and coordination processes. The Lafourche LCMP could have more confidence in their ability to conduct independent field investigations; however, the LCMP staff remain willing to continue giving assistance.

All public notice procedures are properly followed. One year growing season notifications are set as reminders in the Microsoft Outlook calendar system. Lists for all current and previously issued permit authorization and documentation for one year growing season conditions are rigorously kept. These are utilized for permit condition compliance and re-inspection field investigations. Authorization with one year growing season conditions are required to provide pre and post aerial imagery. Special conditions are included in many parish LCUP authorizations. Minimization and avoidance of adverse impacts are taken into consideration when processing local CUPs. The Lafourche LCMP continues its excellent procedures for requiring Needs, Alternatives, and Justification (NAJ) and Hydrological Modification Impact Analyses (HMIA) from applicants. OCM/LCMP staff often utilize Lafourche NAJ and HMIA request examples when giving instruction to other parish LCMPs. During these NAJ and HMIA reviews reasonable alternatives are reviewed and considered prior to issuing a LCUP with impacts. Field

investigation procedures have improved this review period; however, the parish LCMP staff should continue to build confidence in their ability to conduct independent field investigations.

**Suggested Action Item: Lafourche LCMP staff should continue to familiarize themselves with necessary resources in an effort to conduct independent field investigations.**

### **LCMP Managers Meetings and Additional Items**

Lafourche had representation at all LCMP meetings this period and suggested additional wetland plant identification classes from the OCM. The LCMP did not have any recommendations/suggestions for the LCMP handbook. For this periodic review period, Lafourche Parish is currently partnering with the Coastal Protection and Restoration Authority (CPRA) on the Grand Bayou Freshwater Reintroduction Project. Another project, the Golden Meadow Marsh Creation Project being funded by the parish and CPRA is set to commence as early as April of this year. Any nonpoint source pollution or flood prevention education is handled through the parish's Floodplain Management Department. Lafourche only has one marina in the Louisiana Clean Marina Program. There are no plans in the immediate future to certify any others.

### **Permit Decisions**

Lafourche Parish's permit decisions have been consistent with the state program, the state guidelines and its programmatic document. Lafourche conducted numerous field investigations with OCM assistance and continued processing of numerous enforcement cases this period. Lafourche is running a first-rate and very effective LCMP.

### **Parish Comments**

On behalf of the Lafourche Parish Office of Coastal Zone Management, thank you for the time spent on the periodic review of our local program here in Lafourche. We use these reports provided to us to make our program better and to make sure we are providing the best service and support to Lafourche Parish residents. We feel that our strong relationship with OCM continues to help us achieve these goals, and we appreciate the effort that is put forth to ensure that we are running a successful local coastal program. We would also like to thank you, Jon, for your willingness to assist when needed, and you continue to be a great resource for Lindsey and me. (Amanda Voisin, Coastal Zone Management Administrator)

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### **Orleans Parish**

The Orleans Parish periodic review meeting was held November 13, 2018 in New Orleans, Louisiana at the Orleans Parish Coastal Management Office. Mr. Jerome Landry, Floodplain Administrator and Mr. Brad Klamer, Assistant Floodplain Program Manager represented Orleans Parish. Ms. Sara Krupa and Mr. Jon Truxillo represented OCM. There were no public comments received and no members of the public at the meeting.

### **Action Items from Previous Periodic Review 2014/2016**

**Necessary Action Item: Final permit determinations must be published in the official parish journal. The publication of the permit final decision starts the state legislated 10 day appeals clock deadline.**

The Orleans LCMP was moved to a new parish department with all new personnel this review period and this item was not completed. OCM made the Orleans LCMP aware of this requirement at the review meeting and they will begin compliance immediately.

**Suggested Action Item - Orleans Parish should continue to improve in the timely submission of code sheets and other required permit data. Permit data should be received by OCM within five business days of change in permit application status.**

As will be detailed in the Program Administration section below, the Orleans LCMP was moved to a new department with new personnel and all code sheets, contract deliverables and other required data were received in a most satisfactory time frame this review period.

### **Parish Requests**

The City of New Orleans stated they are satisfied with assistance from the OCM. They did not have copies of last period's periodic review report including the previous action items. OCM noted that there was a citation from the regulations regarding the authority for Exempt authorizations missing from the Orleans Exempt Letter. OCM provided copies of the State Exempt Letter templates to Orleans LCMP. It was also evidenced as a result of this period's review that Orleans is not including Basis of Decision documentation in the Coastal Use Permit authorization files. OCM provided examples of Basis of Decision documentation to Orleans LCMP.

**Necessary Action Item – Orleans must include Basis of Decision documentation in Local Coastal Use Permit (LCUP) files.**

### **Program Administration**

The Orleans Coastal Program moved into the Parish Floodplain Department this review period and has all new personnel. Mr. Jerome Landry is the Floodplain Administrator, Coastal Zone Manager Supervisor and Community Rating System Coordinator for the Parish Community Rating System (CRS) Program as part of the National Flood Insurance Program (NFIP). He supervises the Floodplain Department. Mr. Bradley Klamer is the Assistant Floodplain Program Manager, Coastal Zone Manager and Community Rating System Coordinator. Mr. Klamer fulfills most of the duties of the LCMP with assistance from Mr. Landry as needed.

### **Program Processes and Permit Issues**

There were 22 uses of local concern transmitted to and 20 authorizations issued by the LCMP this review period. In addition, the LCMP reviewed 75 uses of state concern. Orleans effectively assigned correct mitigation for one authorization this review period and performed mitigation assessment for another that was withdrawn. Orleans also had one authorization where they used the minimization/avoidance sequencing process to remove all impacts to wetlands and therefore avoided compensatory mitigation requirements. Much of Orleans Parish is in developed urban fastlands behind storm protection levees and many development activities are exempt from OCM permitting. Orleans Parish follows proper public notice procedures on applications for permits. However the Orleans LCMP has not been publishing public notice of permit decisions.

**Necessary Action Item – Orleans Parish must publish the final permit determinations in the official parish journal.**

The parish has not had to condition any permits with one year growing season conditions but feels confident in their ability to do so. The parish did not adopt any new ordinances applicable to the coastal management process this review period. Orleans utilizes construction inspections and final certificate of occupancy procedures to monitor permit activity completion and adherence to permit conditions. Orleans did not comment on any state concern applications this review period and is receiving notification from the state regarding pre-application and geological review meetings. The parish LCMP

was unaware of the Basis of Decision documentation requirement but will begin compliance immediately. Orleans LCMP and OCM staff performed several joint field investigations earlier in this period and now the Orleans LCMP staff feels confident in their ability to perform independent field investigations. Orleans LCMP has done a very good job utilizing the LCMP Field Investigation Report form.

### **LCMP Managers Meetings and Additional Items**

Orleans Parish has had representation at this period's LCMP meetings. Orleans did not have any suggestions for future meetings or classes. Orleans has three marinas in the Louisiana Clean Marina Program, including the very first two certified into the program, and is agreeable to certifying more. Orleans also has Louisiana's only Clean and Resilient Marina certified in the Five Gulf State Clean and Resilient Marina Program.

### **Permit Decisions**

Orleans Parish's permit decisions have been consistent with its programmatic document and the state program. Orleans Parish is following the Coastal Use Guidelines and the parish enforceable policies when permitting applications for activities in the parish. Orleans is operating a quality coastal program and will continue to work with OCM in the upcoming period to identify and correct any program discrepancies should they arise. The new LCMP staff have done a tremendous job of quickly and accurately absorbing the required knowledge involved in the operation of a parish LCMP.

### **Parish Comments**

Orleans Parish accepts the periodic review as written and will continue to strive for improvement in all aspects detailed above. Support from OCM staff has been greatly appreciated especially on the Wetlands Value Assessment Community Model as we assign mitigation to projects. We look forward to continued coordination with counterparts in other parishes through the quarterly meetings and various conferences and events around the state. (Bradly Klamer, Coastal Zone Manager)

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## **Plaquemines Parish**

The Plaquemines Parish periodic review meeting was held on December 19, 2018 in Belle Chasse, Louisiana. Mr. Robert Spears, Parish GIS Manager and LCMP Administrator represented the parish. Mr. Charles Reulet, Ms. Sara Krupa and Mr. Jon Truxillo attended from OCM. There were no public comments received and no members of the public in attendance.

### **Action Items from Previous Periodic Review 2014/2016**

**Suggested Action Item - Plaquemines LCMP personnel should continue to study and learn the technical material required to maintain their program's excellent operation.**

Plaquemines LCMP staff continued in their admirable operation of the program absorbing all training and transmitted information in a thorough manner. This is the second review period that Mr. Spears has been in charge of the program and he eagerly expresses a rapid understanding of all coastal management information that is transmitted. One area of future concern is that Plaquemines Parish dissolved the LCMP Manager position and simply added the LCMP Manager position's duties as additional work responsibility to an already full time Parish GIS Manager Position. Mr. Spears is approaching retirement and the parish has not officially encumbered any staff positions to the LCMP.

**Recommended Action Item – Plaquemines Parish should officially designate a parish position responsible for LCMP administration duties.**

### **Parish Requests**

Plaquemines Parish states they have an outstanding working relationship with the OCM. Plaquemines states that OCM has always provided the parish with guidance, support, knowledge and attention whenever the parish has need. The parish requested additional information on how mitigation regulations address in-kind and in-basin requirements for habitat replacement of wetland impacts, and for the state template letters regarding placing applications on hold and on forced withdrawal of applications due to lack of adequate response to additional information requests. The parish also requested additional wetland habitat species identification classes. OCM has already provided and will continue to provide this information.

### **Program Administration**

The Plaquemines LCMP continued under the administration of Mr. Spears this report period, and Mr. Spears has continued its operation in an excellent and exceedingly professional manner. Ms. Krista Clark, Executive Assistant, assists Mr. Spears and works conscientiously and persistently to keep the program operating smoothly. Mr. Spears and Ms. Clark have been extremely receptive to instruction and make great efforts to acquire the technical knowledge necessary to continue the excellent tradition of Plaquemines LCMP operation. As stated in the previous action items section, Mr. Spears is approaching retirement and the parish should be proactive in addressing the LCMP future administration requirements before he retires. The parish has a CZM Committee of 11 members that are appointed from various parish resource concerns, such as recreational and commercial fishing, by the Parish Council.

### **Program Processes and Permit Issues**

There were 35 uses of local concern transmitted to and 28 authorizations issued by the LCMP this review period; the LCMP reviewed 249 uses of state concern. Plaquemines correctly reassessed impacts and recovery for two authorizations with one year growing season mitigation waiting conditions this review period. All LCUP applications are placed on 25 days public notice and final permit determinations are also published in the official parish journal. Site visits are regularly conducted on all permit applications; in addition, permit authorizations are re-inspected after project completion. Plaquemines LCMP is very proactive in minimizing impacts through the sequencing process of avoidance and minimization of impacts. Applicants are often engaged in the minimization process during the initial site meeting. They are asked to justify the needs and to consider alternatives with less adverse impacts if applicable. The Plaquemines LCMP generally allows applicants time to consider alternatives. If an applicant no longer wishes to move forward the LCMP assists the applicant in voluntarily withdrawing the application. Plaquemines states that any questions or concerns this period on state issued permits were satisfactorily addressed.

Permits are properly conditioned when applicable. All permits are conditioned to maintain compliance with all appropriate local laws including nonpoint source pollution and/or flood prevention measures. All permits issued for a one year growing season are photographed with ground and/or aerial photography both pre and post permit period. The site is then revisited after one growing season for a follow-up inspection. The parish also includes in the files of all permits, before and after photos. A drone was purchased last review period to assist in this process. Plaquemines continues to lead the Louisiana parish coastal programs in the formulation and implementation of these rigorous field investigation inspection and re-inspection procedures, and has consistently served as the role model for adoption of field investigation protocols for the LCMP programs. Basis of Decision documentation is not being included in all permit files.

**Necessary Action Item – Plaquemines must include Basis of Decision documentation in Local Coastal Use Permit (LCUP) files.**

All other contract deliverables, permit documentation, and conservation plan reporting are well prepared and submitted by the parish in a timely manner.

**LCMP Managers Meetings and Additional Items**

Plaquemines attends all meetings and training classes sponsored by OCM and actively participates. Plaquemines has four approved Louisiana Clean Marinas and they would like to add one additional facility to the Louisiana Clean Marina Program and possibly the Gulf of Mexico Alliance (GOMA) Clean and Resilient Marina Program. Plaquemines is engaged in coastal restoration in partnership with the COE beneficial use of dredged material program and with CPRA on Master Plan projects. They also perform many outreach activities with partners including: Barataria Terrebonne National Estuary Program (BTNEP), Ducks Unlimited, Sea Grant, and the Meraux Foundation.

**Permit Decisions**

Plaquemines Parish’s permit decisions have been consistent with its programmatic document and the state program. Plaquemines Parish has made tremendous effort and progress in addressing all concerns involved in running a highly successful LCMP. Plaquemines is operating an absolutely first rate LCMP in every regard. Mr. Spears and Ms. Clark are to be highly commended for the continued excellent operation of their program.

**Parish Comments**

As always the Department of Natural Resources is a key partner for Plaquemines Parish in the fight to preserve our pristine environment and resources for future generation to enjoy. The staff is always there when a question arises and help is needed. I would like to personally thank Jon Truxillo, Frank Cole and everyone else at DNR who makes our program here in Plaquemines Parish what it is today. And for always coming down for a field visit when called upon. (Mr. Robert Spears, Parish GIS Manager and LCMP Administrator)

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**St. Bernard Parish**

The St. Bernard Parish periodic review meeting was held on December 11, 2018 in Chalmette, Louisiana. Mr. William McCartney, Director of Administration/Coastal Program Administrator, represented the parish. Ms. Sara Krupa and Mr. Jon Truxillo represented OCM. There were no members of the public in attendance. There were no public comments received.

**Action Items from Previous Periodic Reviews: 2014/2016**

**Necessary Action Item - St. Bernard Parish should continue to receive individual training in program operation and to submit required deliverables in a timely manner. Permit data should be received by OCM within a few business days of any changes in permit application status.**

St. Bernard satisfactorily submitted permitting data and contract deliverables in a timely manner; one-on-one training with the parish continued this review period. St. Bernard did respond positively to the training that was conducted this period and continues to improve its program operation.

**Necessary Action Item - St. Bernard Parish LCMP must include Basis of Decision documentation (BOD) in their LCUP files.**

St. Bernard Parish LCMP has not acted on this Necessary Action Item. St. Bernard needs to include BODs in their permit files from this point forward. OCM staff is available to assist in developing the proper documents for the parish program.

**Necessary Action Item - St. Bernard Parish LCMP should continue coordination with OCM in order to ensure their program is effective and consistent with its enforceable policies and the state program.**

The timely and correct submission of permit data and contract deliverables continued in its improvement. The St. Bernard LCMP needs to continue to ensure that it always responds promptly to requests for assistance or information from applicants and other government agencies.

### Parish Requests

St. Bernard states they are satisfied with the assistance that is offered by OCM staff. They state that the assistance received is always available when requested and insightful. The St. Bernard LCMP requested some more one on one field inspection training and assistance with OCM staff.

### Program Administration

The operation of the St. Bernard LCMP during the 2016/2018 review period was consistent with and effective in achieving its program objectives. Mr. William McCartney fulfills the role of LCMP Administrator. He is also the Certified Floodplain Manager (CFM), and the Director of Administration for St. Bernard Parish Government. St. Bernard Parish has a CZM committee. The CZM committee has nine members, eight appointed by the Parish Council and one by the Parish President. Mr. McCartney oversees the CZM committee meetings. All parish permits are run through the building permit database so that inspectors in the building department can oversee all parish permits for completion progress and adherence to permit conditions and to ensure all necessary permits are obtained. St. Bernard Parish did not adopt any new coastal ordinances this review period.

### Program Processes and Permit Issues

St. Bernard Parish did not comment on any uses of state concern this review period, the parish did not have any concerns regarding coordination with OCM or other state or federal agencies and stated that OCM assistance has always been excellent in regards to parish comments on uses of state concern.

There were five uses of local concern transmitted to and ten authorizations issued by the LCMP this review period; the LCMP reviewed 80 uses of state concern. St. Bernard did not issue any permits that required mitigation this review period. There were also no permits that required one year growing season conditions. The parish stated they are prepared to work with OCM in developing proper growing season inspection protocols when the need arises. The parish does condition permits with special conditions when needed; all permits are conditioned with notification of work initiation and completion requirements. The St. Bernard LCMP is following proper public notice procedures. There were no field investigations needed this review period. The parish is very receptive to assistance with field investigation and mitigation assessment assistance.

St. Bernard Parish has shown continued improvement this review period in program processes and permit issues. There has been substantial improvement in the timely submission of contract requirements and deliverables over the last several review periods. Contract deliverables are properly prepared and generally submitted on time. OCM will continue coordination and individual instruction with parish personnel. Mr. McCartney has been very receptive to additional training and working with OCM on proper program operation. St. Bernard has not begun including BODs in their permit files.

**Necessary Action Item - St. Bernard Parish LCMP must include Basis of Decision Documentation (BOD) in their LCUP files.**

St. Bernard Parish LCMP has not acted on this Necessary Action Item. St. Bernard needs to include BODs in their permit files from this point forward. OCM staff is available to assist in developing the proper documents for the parish program.

**LCMP Managers Meetings and Additional Items**

St. Bernard attended all LCMP meetings this review period. St. Bernard did not have any suggestions for LCMP meeting topics. The parish is not currently working with any partners on restoration activities or education and outreach activities. The parish currently has no marinas participating in the Louisiana Clean Marina Program; and had no new marina candidates to suggest. The parish is satisfied with the LCMP handbook online.

**Permit Decisions**

St. Bernard Parish’s permit decisions have been consistent with the state program and its programmatic document. St. Bernard Parish is following the Coastal Use Guidelines and the parish LCMP document when permitting applications for activities in the parish. St. Bernard Parish has continued to improve in all areas of program operation this review period and is to be commended for their receptiveness to training.

**Parish Comments**

No comments from St. Bernard Parish were received.

**St. Charles Parish**

The St. Charles Parish periodic review meeting was held on December 12, 2018 in Hahnville, Louisiana. Mr. Michael Albert, St. Charles Parish Planning and Zoning Director, and Mr. Earl Matherne, St. Charles Parish Planning and Zoning Administrator represented the parish. Mr. Charles Reulet, Ms. Sara Krupa and Mr. Jon Truxillo represented OCM. There were no members of the public in attendance. There were no public comments received.

**Action Items from Previous Periodic Reviews: 2014/2016**

The St. Charles Parish LCMP is one of Louisiana’s newest approved parish coastal programs and began operation on July 1, 2017 and has never before undergone the periodic review process. Therefore they have no prior actions items.

**Parish Requests**

St. Charles states they are still largely dependent on the state program for operations guidance. They are satisfied with the assistance they have received so far; and they stated that they have not been in operation long enough to have any constructive suggestions for changes. They have not yet developed a Basis of Decision documentation process and requested assistance from OCM in doing so. OCM has offered assistance and will continue to work with the parish in developing BOD documentation to meet LCMP guidelines. OCM had not updated some of our auto-fillable forms online for LCMPs to include St. Charles Parish, and the parish requested OCM do so. Since that time OCM has resolved this request.

**Necessary Action Item - St. Charles Parish LCMP must include Basis of Decision documentation (BOD) in their LCUP files.**

## Program Administration

Mr. Earl Matherne, Planning Administrator is charged with running the LCMP. He reviews all permit applications, performs all field work, and finalizes all written communications. He is also the Certified Floodplain Manager. St. Charles Parish has a CZM committee. The CZM committee has seven members appointed by the Parish Council. The committee has been in existence since 1979, well before the LCMP gained approval in 2017. The committee has mostly been involved in coastal restoration issues in the past. St. Charles Parish approved their coastal ordinance in 2015, two years before LCMP approval in 2017.

## Program Processes and Permit Issues

The operation of the St. Charles LCMP during the 2016/2018 review period was consistent with and effective in achieving its program objectives. St. Charles Parish did not comment on any uses of state concern this review period; the parish did not have any concerns regarding coordination with OCM or other state or federal agencies, and stated that OCM assistance has been satisfactory. St. Charles has not received any CUP applications that required public notice, but the parish is publishing notice of the decisions on the Exempts and NDSIs that have been issued. There were four uses of local concern transmitted to and three authorizations issued by the LCMP this review period; the LCMP reviewed 137 uses of state concern. St. Charles did not issue any CUPs with special conditions or that required mitigation this review period. There were also no permits that required one year growing season conditions. The parish stated they are prepared to continue to work with OCM to develop all proper permit processing protocols and mitigation assessment procedures as the needs arise. The parish is prepared to condition permits with special conditions when needed. The LCMP worked together with OCM on two field investigations this review period. Both investigations determined that there were no significant impacts to coastal resources. St. Charles Parish is very receptive to assistance with field investigation and mitigation assessment assistance. St. Charles Parish Planning and Zoning Department in which the LCMP operates currently has an enforcement branch; the LCMP will continue to utilize the procedures established in the department for LCMP enforcement needs. OCM has assisted the St. Charles LCMP in BOD development and St. Charles LCMP has developed a BOD document for their files.

## LCMP Managers Meetings and Additional Items

St. Charles attended all LCMP meetings this review period. St. Charles did not have any suggestions for LCMP meeting topics. The parish is currently working on restoration activities with partner agencies and education and outreach activities for flood preventions. The parish has no marinas in the Clean Marina Program. The parish is satisfied with the LCMP handbook online now that the St. Charles Parish option has been added to all the drop-downs applicable.

## Permit Decisions

St. Charles Parish's permit decisions have been consistent with the state program and its programmatic document. St. Charles Parish is following the Coastal Use Guidelines and the parish LCMP document when permitting applications for activities in the parish. St. Charles Parish has shown a most earnest desire to be consistent in all areas of program operation and is to be commended for their receptiveness to training and the program's excellent operation so far.

**Suggested Action Item: - St. Charles LCMP should continue to remain enthusiastic and receptive to training.**

## Parish Comments

Since this is our first review I do find it helpful to know what I should be looking for in our program to keep track of. (Earl Matherne, Planning Administrator)

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## St. James Parish

The St. James Parish periodic review meeting took place on December 4, 2018 in Convent, Louisiana. Mr. Blaise Gravois, Director of Operations and Mr. Eric Wolverton, Permitting and Planning Supervisor, represented the parish. Mr. Charles Reulet and Mr. Jon Truxillo represented OCM. There were no public comments received and no members of the public in attendance.

### Action Items from Previous Periodic Review 2014/2016

**Necessary Action Item - St. James must continue their training with OCM in order to become efficient in the technical aspects of LCMP operation.**

For this periodic review the St. James LCMP staff were uninformed of the Necessary Action Item from the previous review period's report and did not offer comment in their report or at the meeting. The majority of the operations of the LCMP are performed by the Permitting and Planning Supervisor, and Mr. Wolverton was placed in this position during the current review period after the last review. He was unaware of the Necessary Action Item but received extensive training this review period. The Necessary Action Item is repeated for this review period.

**Necessary Action Item - St. James must continue their training with OCM in order to become efficient in the technical aspects of LCMP operation.**

The St. James LCMP has recently made progress in absorbing some of the LCMP operations training that is being conducted by OCM; however, the program shall continue to earnestly strive to become familiar with all aspects of program operation.

### Parish Requests

St. James is satisfied with OCM assistance but stated the OCM staff needs to have more patience when interacting with parish LCMP staff. All parish LCMP staff wear multiple hats and may not have time available to resolve all issues immediately when OCM requests. The parish does comment on state concerns conducted in the parish and is satisfied with OCM's responses. The parish also stated that the St. James LCMP does not always have time to meet the deadlines prescribed by OCM. St. James should be aware that while data deliverables deadlines are made with some OCM discretion, permit processing deadlines are not. OCM and St. James LCMP are legally obligated to meet permit processing deadlines as established by our enabling legislation and attendant regulations. St. James LCMP expressed a desire for continued training, especially in regards to field investigation and mitigation assessment. St. James LCMP also suggested that Basis of Decision document examples be added to the LCMP handbook.

### Program Administration

The St. James Parish LCMP is administered by Mr. Blaise Gravois, Director of Operations. Program coordination and reports are completed by Ms. Hope Borne. Mr. Eric Wolverton replaced Ryan Donadieu as Permitting and Planning Supervisor and Assistant Coastal Zone Administrator. Ms. Deirdra Bradford answers all office phone calls and distributes messages to Mr. Gravois.

Mr. Gravois is the Director of Operations for St. James Parish. His duties include oversight of all activities involving roads, bridges, building maintenance, construction, drainage, solid waste, utilities

(gas and water), and permitting and planning. Mr. Gravois examines all LCMP activities and prepares materials for the monthly meetings. Ms. Borne is the administrative assistant and helps Mr. Gravois in his daily activities and responsibilities. She also assists with the administration of the LCMP program. Ms. Bradford is the receptionist for the Parish President's Office and serves as the overflow for phone messages and mail receipt for the Director of Operations. Mr. Wolverton is the Permitting and Planning Supervisor and is responsible for conducting all field inspections and verifying compliance with permitted activities. His job duties include the issuance of all building permits within the unincorporated areas of the Parish.

The Coastal Zone Management (CZM) Advisory Committee is composed of eight members – one member from each council district, and one member appointed by the Parish President. The other members are appointed by the Parish Council and serve at the pleasure of the Council. The committee meets on the last Wednesday of every month at 5:00 pm in the Convent courthouse.

### **Program Processes and Permit Issues**

The operation of the St. James Parish LCMP during the 2016/2018 review period was not entirely consistent with or effective in achieving its program objectives. Numerous errors and incorrect procedures and processes occurred on multiple permit applications and authorizations. OCM was obligated to step in on several occasions to assist in correcting serious breaches in protocol, most of which were violations of the enabling laws and attendant regulations that govern our programs. Perhaps the most serious of these involved the parish LCMP issuing a parish only authorization (Parish Letter of No Objection) that was, in essence, identical to the State Coastal Use (No Direct and Significant Impact) authorization. This caused multiple problems and much confusion with permit applicants and with other state and federal government agencies. In addition, this was de facto action on the parish LCMP's part of regulation of uses reserved to the State Coastal Program by the parish LCMP. This is expressly forbidden in the State and Local Program's attendant laws and regulations.

**Necessary Action Item - St. James shall not issue parish coastal use authorizations or letters of no objection that give the appearance, or are in effect, de facto regulation of uses of state concern by the parish program. St. James must be careful not to use its LCMP to exert any authority over uses of state concern as set forth in the State and Local Coastal Resources Management Act (SLCRMA) and the regulations promulgated thereto.**

There were eleven uses of local concern transmitted to and eight authorizations issued by the LCMP this review period; the LCMP reviewed 66 uses of state concern. St. James LCMP with OCM assistance successfully issued one permit that required mitigation assessment this review period; however, there were also several mitigation assessments done for activities being processed as enforcement actions and two more that resulted in total avoidance of wetland impacts during processing. St. James LCMP staff has made some recent limited progress in learning the permit application evaluation, field investigation and mitigation assessment processes; however, there is still a great deal more training required in all these areas.

The St. James LCMP appears to be following all proper public notice procedures. The parish does have a process to monitor one year growing season and other special permit conditions. They utilize the Outlook Calendar function for these procedures. The parish has been conducting numerous field investigations with OCM assistance. OCM has also been working with the parish on violation and enforcement procedures. The St. James Parish LCMP has not established a Basis of Decision document process.

**Necessary Action Item – St. James must include Basis of Decision documentation in Local Coastal Use Permit (LCUP) files.**

### **LCMP Managers Meetings and Additional Items**

St. James Parish LCMP was well represented at local coastal LCMP meetings and other OCM sponsored programs. The parish suggested additional field investigation and mitigation assessment training as topics for future quarterly meetings. The parish does not have any operating marinas for inclusion in the Louisiana Clean Marina Program. St. James Parish participates in public education and outreach for flood prevention and the Community Rating System (CRS) program.

### **Permit Decisions**

Because of OCM oversight and correction, St. James Parish’s permit decisions were consistent with the state program and its programmatic document; however, OCM was required to step in on multiple occasions to take corrective action to ensure the LCMP was operating consistently with the established laws and regulations attendant to our programs. St. James Parish needs to ensure they are following the State and Local Coastal Resources Management Act (SLCRMA), the Coastal Use Guidelines and the St. James Parish Programmatic document and Coastal Ordinance when permitting applications for activities in the parish. St. James is striving to achieve a consistent program but does require additional training to achieve continued consistency.

### **Parish Comments**

No Comment (Eric Wolverton, Permitting and Planning Supervisor and Assistant Coastal Zone Administrator)

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## **St. Tammany Parish**

The St. Tammany Parish periodic review meeting was held November 7, 2018 in Covington, Louisiana. Mr. Sabrina Schenk, Watershed Coordinator/Coastal Management Program Administrator, represented the parish. Ms. Sara Krupa and Mr. Jon Truxillo represented the OCM. There were no public comments received and no members of the public in attendance.

### **Action Items from Previous Periodic Review 2014/2016**

There was one required action item and two suggested action items from the previous review period.

**Required Action Item: St. Tammany LCMP should continue proper mitigation protocol training with OCM.**

Ms. Schenk attended all the mitigation training classes held this report period and participated in individual training sessions with OCM staff. She has attained an excellent understanding of the complete mitigation process and has accomplished all tasks associated with evaluating impacts and assigning appropriate compensatory options exceptionally well.

**Suggested Action Item - St. Tammany should work with OCM on incorporating one year growing season condition inspection protocols.**

Permits with one year growing season requirements are now properly conditioned and the requested protocols were established and are in place.

**Suggested Action Item - St. Tammany LCMP should be timelier with invoices and quarterly reports. Invoices and reports should be received by the 15<sup>th</sup> of the month following the quarter's end.**

Invoices and reports were received in a timely manner this report period.

### **Parish Requests**

St. Tammany LCMP stated that they are satisfied with state information and assistance provided. They find OCM staff extremely helpful and pleasant. They commented that mitigation assistance is outstanding. They had no requests for any changes in the state/local program coordination area. St. Tammany LCMP stated that instruction classes are well prepared and additional classes are always welcome. They would like to see some more peer focus instruction if possible. OCM will organize a more peer focused training curriculum for St. Tammany either involving all LCMPs or selected LCMPs in the St. Tammany vicinity.

### **Program Administration**

Ms. Sabrina Schenk is the LCMP Administrator/Watershed Coordinator. Ms. Schenk assumed the program's operation very early in this review period's timeframe. In addition to reviewing all CUP applications and supplying OCM with the LCMP's deliverables, Ms. Schenk is also responsible for Watershed Management, Storm Water Controls and Engineering, and the review of local building permits and large developments. St. Tammany comments on state concern permits in their parish if necessary and feels their comments are adequately considered. There was one instance where a state authorization had the potential to conflict with a parish regulatory building constraint, and that situation was resolved to both the state and parish's satisfaction. St. Tammany Parish replaced their Storm Water Ordinance this review period and does not have a Coastal Management Committee. The parish experienced a personnel downsizing this report period due to loss of tax base but also raised their CUP fees and greatly increased the number of CUP applications submitted by proactively informing applicants for other types of parish permits of the need to obtain CUP authorizations.

### **Program Processes and Permit Issues**

There were 257 uses of local concern transmitted to and 237 authorizations issued by the St. Tammany LCMP this review period; the LCMP reviewed 72 uses of state concern. Ms. Schenk proactively educated other parish permitting departments and the parish citizens about the benefits in obtaining written CUP authorizations even if an activity is exempt. Ms. Schenk makes effective utilization of the OCM online CUP self-determination tool. If the tool does not clearly indicate that an activity is above the five foot contour, she will accept a certified elevation certificate from a land surveyor in order to issue an Exempt authorization, if appropriate. The St. Tammany LCMP is making excellent utilization of the Hydrologic Modification Impact Analysis (HMIA) and the Needs, Alternatives and Justification (NAJ) processes. They include Basis of Decision (BOD) documentation in all files and were instrumental in assisting OCM in BOD development for the other LCMPs. The St. Tammany LCMP has integrated an electronic database system into the CUP process. Applications are entered into the system and permit authorization processing is prioritized. Inspection dates and compliance issues are also identified by the system. Applicants are notified by the system if there are any outstanding issues related to their permit authorization as well.

Three applications with proper mitigation assigned were processed by the LCMP during this review period. Ms. Schenk has done a very commendable job learning the intricacies of assessing and assigning compensatory mitigation and all requirements such as: letters, field reports, wetland assessment modeling and other data needs are prepared and submitted in an exemplary manner. OCM staff

accompanied Ms. Schenk on numerous field investigations for mitigation assessments this review period.

The program has excellent coordination with federal, state and local agencies. The parish has violation, enforcement and monitoring protocols in place. All public notice requirements are met. They also have individual parish On-Site Sewerage Disposal Systems (OSDS) regulations in place and remain one of the most progressive Louisiana parishes in this respect as well. Storm water control systems are required to contain sediment and prevent erosion. St. Tammany has been doing an excellent job following the process to avoid and minimize impacts from permitted activities. They have been documenting this impact reduction in the code sheets.

### **LCMP Managers Meetings and Additional Items**

St. Tammany LCMP personnel attended all meetings, symposiums and training sponsored by OCM this review period. They actively participated and were very helpful in suggesting and presenting topics for meetings. Outreach activities include: Managing the Storage Capacity of the Floodplain, Keep St. Tammany Beautiful, Household Hazardous Waste Day and Storm water Control Information. The parish has four Louisiana Clean Marina participants and would like to see all marinas participate.

### **Permit Decisions**

St. Tammany Parish's permit decisions have been consistent with the state program and its own program's enforceable policies. Ms. Schenk has done an outstanding job administering the program. St. Tammany Parish is using the state Coastal Use Guidelines and the appropriate parish guidelines for their permit decisions. The St. Tammany program remained the frontrunner in some of the latest innovation and implementation procedures regarding LCMP protocols and processes. They enthusiastically share these innovations with the other LCMPs when requested. Their program operation is first rate.

### **Parish Comments**

St. Tammany Parish continues to benefit from OCM oversight and cooperation as the OCM provides our LCMP with assistance in such areas as increased public awareness, increased local coastal restoration projects, decreased local coastal impacts, and by facilitating networking with other Local Coastal Programs. The St. Tammany Parish LCMP is particularly appreciative of the OCMs outstanding mitigation assistance that enabled me to become more proficient in the mitigation process. The manager meetings include training and presentations that are well prepared and constructive and the "round table" discussions encourage peer input from other LCMPs. The support from the OCM is effective and timely and is provided by knowledgeable, courteous staff. (Sabrina Schenk, LCMP Administrator)

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## **Terrebonne Parish**

The Terrebonne Parish periodic review was held on October 24, 2018 in Houma, Louisiana. Mr. Mart Black, Terrebonne Parish Director of Coastal Restoration and Management, and Ms. Vicki Summers, Administrative Secretary represented the parish. Ms. Sara Krupa and Mr. Jon Truxillo represented OCM. There were no public comments received and one member of the public, Terrebonne Parish Coastal Management Committee Chairmen, Mr. Mickey Thomas, of South Louisiana Bank was in attendance.

### **Action Items from Previous Periodic Review 2014/2016**

Terrebonne LCMP had one Necessary Action Item and one Suggested Action Item from the 2014/2016 review period.

**Necessary Action Item - Terrebonne LCMP must consult with the OCM whenever they are unsure about the regulations and requirements regarding program operation, especially when compensatory mitigation is involved.**

Terrebonne Parish made very significant progress in this area in the 2016/2018 period. Consultation and coordination were exemplary, especially in regard to mitigation.

**Suggested Action Item - Terrebonne LCMP should establish a quality control process whereby they double check contract deliverable submittals to ensure minimization of errors.**

Terrebonne Parish also made very significant progress in this area in the 2016/2018 period. There were very few errors in deliverables this period.

### **Parish Requests**

The Terrebonne Parish Office of Coastal Restoration and Preservation states that they are extremely satisfied with the assistance provided by the state OCM. The Terrebonne program states that OCM has been very responsive and helpful whenever assistance is requested. They had no specific changes or actions to recommend regarding state/local program coordination/interaction. The stated that additional training in field investigation procedures and the Wetland Value Assessment (WVA) model methodology would be appreciated.

### **Program Administration**

The Terrebonne program made no changes in program administration since the last review period. Mr. Mart Black, AICP, remains as the Director of the Coastal Restoration and Preservation Office and his responsibilities have not changed relative to the LCMP. Mr. Black performs all technical aspects of program operation. He was appointed to serve as the official Custodian of Public Records by the Terrebonne Parish Council since the last review period and he also functions as the Public Information Officer for the parish when the Emergency Operations Center is activated for hurricanes or other emergencies.

Ms. Vicki Summers is the department's Administrative Secretary and her duties relative to the LCMP program are unchanged since the last review period. Ms. Summers manages the correspondence and organization of the department; prepares permits, certificates and letters for distribution, handles publication of public notices, serves as secretary for the Terrebonne Parish Consolidated Government (TPCG) Coastal Zone Management (CZM) and Restoration Advisory Committee meetings - including the preparation of public notices, agendas and recordation of minutes, and executes the processing of all payments to and from the department. Terrebonne has a Coastal Zone Management Committee that serves in an advisory capacity. The CZM Committee has 15 members. Terrebonne Parish did not adopt any new ordinances this period. Terrebonne LCMP reviews all state concern applications within the parish and comments when appropriate through the LCMP office and/or the CZM Advisory Committee. The parish has a very good working relationship with the state and is confident their comments are adequately considered when they are offered.

### **Program Processes and Permit Issues**

There were 52 uses of local concern transmitted to and 42 authorizations issued by the LCMP this review period; the LCMP reviewed 225 uses of state concern. Three applications with mitigation were processed by the LCMP during this review period. Several applications were withdrawn after mitigation assessments were performed and the applicants were informed of the mitigation requirements. All local concern applications that are determined to be Local Coastal Use Permits (LCUPs) are placed on a 30-day public comment period after being published in the official parish journal. In addition, final

determinations are also published in the official journal when the minutes of the CZM Advisory Committee are published. Terrebonne is currently placing one year growing season conditions in their permit authorization; however, they are also considering utilizing high definition video drone capabilities to supplement with pre and post construction photographic analysis of site conditions. The Terrebonne program expressed gratitude for the assistance they receive from OCM on field investigations whenever the parish requests such assistance. The Terrebonne LCMP has well established enforcement and violation procedures. They are constantly attempting to minimize and avoid wetland impacts through the permit review process, and they make proper utilization of the Hydrologic Modification Impact Analysis (HMIA) and the Needs, Alternatives and Justification (NAJ) processes. They include Basis of Decision (BOD) documentation in all files. Terrebonne LCMP strives to serve the public by processing every permit application as quickly as possible. They are always available to respond to inquiries from applicants who may be unfamiliar with the CUP process or that are sometimes frustrated with the length of time required to obtain compliance permits. The Terrebonne program finds that showing understanding and imparting knowledge goes a long way in assisting applicants through the environmental compliance process. There were instances where applicants claimed they were not informed by other parish permitting departments about the need to apply for Coastal Use Permits. In response, the Terrebonne LCMP initiated a parish permitting department education program regarding CUPS and developed a checklist for relevant parish departments to distribute to applicants informing them about the need to apply for CUPs.

#### **LCMP Managers Meetings and Additional Items**

The Terrebonne LCMP is present and active at the LCMP meetings, workshops and other training classes. They expressed an interest in more field investigation classes. The parish worked together on a restoration project with the COE for shoreline protection along the Houma Navigation Canal. Terrebonne Parish has five marinas participating in the Clean Marina Program. Terrebonne has the most certified Louisiana Clean Marinas of any of the Louisiana parishes and hopes to certify more.

#### **Permit Decisions**

Terrebonne LCMP is using the Coastal Use Guidelines and the enforceable policies when permitting applications. Terrebonne Parish's permit decisions have been consistent with the state program and its programmatic document. Terrebonne Parish is running a very worthy program.

#### **Parish Comments**

The TPCG Office of Coastal Restoration has worked to build a very good professional relationship with DNR/OCM. We are most grateful for the assistance we have been given from OCM as well as the responsiveness of the personnel in this office. We look forward to continuing this relationship for the betterment of coastal Terrebonne Parish. (Mart Black, Director of the Coastal Restoration and Preservation)