

Louisiana Local Coastal Management Programs

Periodic Review

July 1, 2018 to June 30, 2020



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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). Louisiana 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 and Field Services Division (IAFSD) of the Office of Coastal Management (OCM) of the Louisiana Department of Natural Resources (LDNR) conducted periodic program reviews of the twelve Louisiana LCMPs for the period of July 1, 2018 to June 30, 2020.

REVIEW METHODOLOGY

Per Louisiana Administrative Code (L.A.C.) 43:I.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 enforceable policies: program documents, ordinances and other relevant 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 coastal resources of the state and parishes.

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

- Several items were audited for each parish program such as previous periodic review findings; contract files and other deliverables for each individual parish program; database queries of uses of local concern applications, updates to parish ordinances and protocols, as well as, any other program additions, changes or other improvements implemented during the review period.
- Each LCMP completes 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.
- Virtual periodic review meetings were held for all the LCMPs, and were attended by representatives of the parish LCMP and by OCM staff members: Sara Krupa, Mark Hogan and 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 findings of this periodic review report are sent to the LCMPs. In addition, the report is posted on the OCM website.

GENERAL DISCUSSION

All parish programs were found to be consistent with the state program and their LCMP programmatic documents and other enforceable policies. Appropriate and correct wetland mitigation assessment training remains a top priority for many programs. The parishes effectively 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 Reporting and other local, state and federal wetland compensatory mitigation requirements. OCM continues to work with the parishes to ensure proper sequencing procedures of avoidance and minimization are implemented through Needs Alternative and Justification (NAJ) analyses 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 to individualized and group training in mitigation procedures and assessments, as well as, the 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

All 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 a nominal amount of OCM oversight and assistance. All parishes were operated without the need for excessive oversight or corrective actions and all achieved satisfactory operation this period.

All parish programs:

- Strive to assess appropriate mitigation with OCM staff assistance; they submit their initial mitigation assessments to OCM's mitigation section for review and to obtain the appropriate compensatory mitigation options;
- Continue to show improvement in acquiring the technical knowledge necessary to accurately process authorizations;
- Continue to show improvement investigating potential unauthorized activities and compliance with permit conditions;
- 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 field inspection follow-ups or transferred enforcement actions statuses that may need resolution or proper data entry corrections.

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

Calcasieu Parish

The Calcasieu Parish periodic review meeting was held on March 3, 2021. Representing Calcasieu Parish was the Calcasieu LCMP Administrator, Laurie Cormier. Sara Krupa, Mark Hogan and Jon Truxillo represented OCM. There were no public comments received by the parish or OCM.

Action Items from Previous Periodic Review 2016/2018
There were no recommended or necessary action items from the previous review period.
Action Items from Current Periodic Review 2018/2020
No recommended or necessary action items

Parish Requests

Calcasieu stated they are satisfied with state assistance and had no recommendations for OCM/LCMP coordination improvement. The parish especially appreciates the state's assistance after the impacts from Hurricanes Laura and Delta that devastated the region in 2020. Calcasieu LCMP requested continued assistance with field investigation training. OCM will continue to provide individualized assistance, as well as, group classes in wetland habitat and plant species identification for all twelve approved LCMPs. The parish has continued to place emphasis on learning proper program protocols and procedures with special attention towards technical expertise in an effort to achieve a greater degree of independence from OCM oversight.

Program Administration

Laurie T. Cormier serves as the Coastal Zone Administrator and she utilizes 60% of her time for those duties. The other 40% of her time is dedicated as a Hazard Mitigation Consultant. Laurie serves on the Coastal Protection and Restoration Authority (CPRA) Board and is co-chair of the Environmental Committee with the Southwest Louisiana Chamber. Laurie also serves as the Administrative Coordinator for the Chenier Plain Coastal Protection and Restoration Authority. Jennifer H. Cobian, Amber Downs and Natasha Willis are team members on the parish team. The Calcasieu Parish Coastal Zone Advisory Committee consists of the Planning and Zoning Board which meets once a month to discuss coastal issues. The Parish has not adopted any new coastal ordinances or resolutions that could have impacts to local coastal resource or management issues this review period.

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. Thirty-two uses of state concern were transmitted to the LCMP for comment. There was one authorization this period that required a one-year growing season condition to assess impacts to vegetated wetlands and one that required a mitigation condition.

The process for monitoring permit activity is done through periodic site inspections. Calcasieu LCMP inspects and enforces all permit requirements. The parish receives notifications regarding pre-application meetings and geologic review meetings from the state. The parish comments on state concerns when they believe it is appropriate and feels that the parish comments are adequately addressed.

All local concern applications that are determined to be CUPs are placed on a 30-day public comment period, and all final permit determinations are published in the official parish journal. The final decisions are published on the parish web site as well. The LCMP includes Basis of Decision (BOD) documentation in all LCUP permit files. The parish includes special conditions in permits. The parish uses one-year growing season condition with pre- and post- project photography, re-vegetation percentage or other

special conditions as needed. The parish utilizes proper NAJ, Hydrological Modification Impact Analysis (HMIA) and mitigation sequencing procedures. The parish requested assistance assessing wetland mitigation for unavoidable wetland impacts associated with permits and field investigations as needed.

Field investigations are conducted by going out to the site and viewing the potential impacts, and a field investigation form is always prepared. Laurie requests assistance when needed. The parish is very progressive in regards to community resiliency and has established procedures for storm water controls and nonpoint source pollution prevention.

LCMP Managers Meetings and Additional Items

The parish attended all LCMP meetings during the review period. Calcasieu suggested highlighting protocols and procedures with special attention towards technical information (i.e. a wetland biologist presenting on what they are specifically looking for on a site visit and providing habitat resource web site links to the LCMP) for future meetings. Calcasieu is active in regional 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 the NOAA-309 Resiliency Task: *Improved Flood Protection Analysis Incorporation into Calcasieu Parish's Local Coastal Use Application Review*. This five-year project in partnership with OCM was completed and reported on to NOAA this year. The LCMP will continue to coordinate on all future local concern permits and disseminate all new coastal community resiliency information to permit applicants in the future. Calcasieu Parish participates in outreach education activities for coastal nonpoint pollution control in several ways: Laurie 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, and 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 Laurie 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)

Cameron Parish

The Cameron Parish periodic review meeting was held on February 24, 2021. Representing Cameron Parish was the LCMP Administrator, Kara Bonsall. Sara Krupa, Mark Hogan and Jon Truxillo represented OCM. There were no public comments received by the parish or OCM.

Action Items from Previous Periodic Review 2016/2018
Necessary Action Item: The Cameron LCMP shall include all conditions required by the appropriate enforceable policies, especially one-year growing season mitigation conditions, in their authorizations and submit timely data for the required concerning growing season conditions on their data code sheets.
Result: Resolved Cameron LCMP greatly improved in one year growing season mitigation condition and the corresponding follow-up procedures. Cameron LCMP has been updating code sheet data in a timely manner. In addition, all mitigation assessments are submitted to the OCM mitigation section for review to assure all mitigation being assessed is in compliance with state and parish regulations.
Action Items from Current Periodic Review 2018/2020
No recommended or necessary action items

Parish Requests

Cameron LCMP is satisfied with state assistance. Cameron LCMP stated they would like to see the continued efforts of OCM regarding Emergency Use Authorizations and other program assistance for damages caused by natural disasters. Cameron LCMP feels the challenges dealing with recovery activities from a disaster require outside resources at high levels; and, that phased approached activities are needed to restore the integrity of landscapes to pre-storm conditions and reduce impacts to life and property. OCM assisted with parish LCUP permitting following recent hurricanes and established an after the storm emergency use authorization procedure in these regards. The parish also requested assistance setting up a pre-application meeting with OCM Permitting Section to discuss expedited review of permits to clean the parish drainage canal system's accumulated storm debris.

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. Kara makes determinations on LCUP applications and submits program deliverables. Kara's other parish responsibilities consist of assisting the permitting department with floodplain development permits, explaining floodplain management regulations, and she is responsible for administering and enforcing the requirements of the Cameron Parish Flood Damage Prevention Ordinance. Kara also works closely with the Local Gravity Drainage Districts on implementing projects and permitting. Kara is a Certified Floodplain Manager (CFM).

Robin Morales assists Kara with secretarial duties of the program. She also is a CFM tasked with issuing floodplain development building permits, enforcement of floodplain management regulations and when necessary prepares violation letters to ensure compliance of properties. Kara and Robin work well

together and are very knowledgeable about permits and the relevant regulations for all development activities in the parish coastal zone.

Cameron Parish has a Coastal Zone Management Committee. The committee consists of the six Cameron Gravity Drainage Districts, the Coastal Restoration Committee, and the Police Jury. The Cameron Parish Police Jury adopted a new resolution this review period. This resolution of support was adopted on January 13, 2020 to support legislative efforts to improve the State Coastal Use Permit (CUP) process on existing maintenance projects for local governmental agencies.

Program Processes and Permit Issues

There were 36 uses of local concern transmitted to the LCMP and 29 authorizations issued by the LCMP this review period. One hundred and thirty four uses of state concern were transmitted to the LCMP for comment. There were seven authorizations this period that required one year growing season conditions to assess impacts to vegetated wetlands and one authorization was assigned a wetlands compensatory mitigation purchase requirement.

The Cameron LCMP has developed cards for applicants to complete and mail in that provide notification of the project commencement date. The parish is receiving notifications regarding pre-application meetings and geologic review meetings from the state. The parish commented within this reporting period on a state concern application that potentially affected public safety and attended one pre-application meeting. The state adequately considers the parish's comments and OCM provides responses regarding the parish's comments. Within this report period, the parish has no specific cases where comments were not adequately addressed.

The Cameron LCMP does not have any issues with LDNR or other agencies but would like for OCM to consider adjusting its policies regarding activities and properties that are negatively impacted by Gulf storm events. OCM should consider expediting those applications that deal with restoring storm damage to pre-storm conditions. These concerns are especially applicable to residential properties located on the beaches and within residential developed areas. Preserving Cameron's coastal beaches is important to Cameron Parish and to Louisiana as a whole.

The Cameron LCMP follows all proper public comment periods on local concern applications and authorizations by placing a public notice in the official parish journal. A calendar notification system has been implemented for the one year growing season mitigation conditions. The parish includes special growing season and other conditions in permits by requesting the permittee provide pre and post-ground aerial photography and any additional comments provided by other state agencies. Cameron LCMP conducts field investigations on all local concern applications and a LCMP field inspection report is compiled along with photos of the project site. In some select cases a request is made for the OCM field biologist to assist with the investigation.

Cameron LCMP is following proper procedures for NAJ and HMIA requirements. Cameron is referring applicants to the online guidance when necessary for those projects that require additional information in excess of what has been provided in the application. Cameron Parish works with applicants to minimize and avoid adverse impacts during the permitting review process and these measures are reflected on the impacted habitat code sheet. Cameron LCMP has continued the process for including a Basis of Decision Document (BOD) for the permit files.

LCMP Managers Meetings and Additional Items

Cameron Parish has been represented at all LCMP meetings. Ms. Bonsall is also in attendance at the various training programs and workshops offered by OCM. Cameron suggested field classes and instructional materials be prepared for future LCMP training. Cameron is making excellent use of the LCMP Handbook and other on-line resources. Cameron LCMP participates in both parish restoration projects and in coastal education and outreach. The Cameron Parish Police Jury and local citizens volunteer along with the Coalition to Restore Coastal Louisiana and assist in grass plantings and beach/dune restoration along the coast.

Cameron has no marinas in the Louisiana Clean Program at this time.

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 Ms. Morales should be commended for their expertise and professionalism, responsiveness to OCM requests, and for the high quality of program operation.

Parish Comments

Cameron Parish is appreciative of the assistance and support from OCM Staff especially during the most recent natural disasters. We are most grateful for the expediated review of permit applications that involve maintenance of existing drainage systems throughout our parish. This local initiative ensures an effective drainage system for the betterment of Cameron's landscape. We look forward to the continued coordination with OCM mitigation section and all OCM Staff that helps the LCMP operate more efficiently. (Kara Bonsall, LCMP Administrator)

Jefferson Parish

The Jefferson Parish periodic review meeting was held on March 26, 2021. Representing Jefferson Parish were the Permit Specialist/Coastal Resources Manager, Jason Smith, as well as, Michelle Gonzales, Director, Jefferson Parish Ecosystem and Coastal Management Department. Sara Krupa, Mark Hogan and Jon Truxillo represented OCM. There were no public comments received by the parish or OCM.

Action Items from Previous Periodic Review 2016/2018
There were no recommended or necessary action items from the previous review period.
Action Items from Current Periodic Review 2018/2020
No recommended or necessary action items

Parish Requests

Jefferson LCMP is satisfied with the assistance provided by OCM. There was regular communication and coordination this period between Jefferson LCMP and OCM Field Biologist, Frank Cole. Sara Krupa, Mark Hogan, Jon Truxillo and Sharon McCarthy Pecquet were also pointed out as being very helpful to the LCMP. Jefferson LCMP had no comments or suggestions on state/local coastal programs interaction but feels that additional NAJ and HMIA guidance/assistance on OCM's part would be beneficial.

Program Administration

This review period Jefferson Parish Council adopted an ordinance establishing the Department of Ecosystem and Coastal Management, which replaced the former Coastal Management Department. Jefferson Parish Council also adopted a resolution approving the appointment of Michelle M. Gonzales to the position of Director of Ecosystem and Coastal Management. As Administrator of the Jefferson Parish Local Coastal Program, Ms. Gonzales manages and oversees all related coastal matters in Jefferson Parish, including serving on numerous boards and committees, engaging outside state and federal agencies for funding, and seeking out partnerships to provide more coastal restoration and protection to the Parish. Permit Specialist, Jason Smith, primarily handles all matters regarding implementation of the Local Coastal Program contract between Jefferson Parish and LDNR. Jason's title changed in May of 2020 to Coastal Resources Manager. Coastal Projects Specialist, Seamus Riley primarily handles preparation and drafting of grants, preparation of meetings, including preparing/organizing educational outreach, and performs permit tracking. He also is responsible for technical tasks such as: GIS tasks, diagrams and website materials; research and information; developing spreadsheets, etc. All staff contribute in implementation of coastal restoration projects, environmental cleanup events, educational outreach, and other miscellaneous events.

Program Processes and Permit Issues

There were 53 uses of local concern transmitted to, and 40 authorizations issued by the LCMP this review period; 159 uses of state concern were transmitted to the LCMP for comment. There were no authorizations this period that required a one year growing season condition to assess impacts to vegetated wetlands. There were three instances of assigned compensatory mitigation this period. The LCMP calculated appropriate compensation and conducted excellent coordination with OCM's mitigation section, and the proper state and federal mitigation partners. Jefferson LCMP is to be commended for its outstanding mitigation assessment and coordination process.

The Jefferson Parish LCMP utilizes a spreadsheet database to track local and state permit applications. Effort is made to monitor several local concern projects during any one field investigation when traveling the long distance to lower coastal Jefferson Parish. Jefferson LCMP receives pre-application and geologic review meeting notifications from the state in a timely manner.

Most state concern activities in Jefferson Parish involve oil and gas maintenance work such as: removing, repairing, replacing, or lowering of oil and gas pipelines, platforms, and associated equipment. There were no cases concerning OCM not adequately addressing any LCMP concerns, or any major issues to report regarding other state or federal agencies. The LCMP provides comments when needed to OCM concerning state concerns. Jefferson LCMP prefers that oil and gas activities be performed in waterways and/or in open waters. If the situation presents itself where it is not practical to install a pipeline in a waterway or in open waters, Jefferson requests boring underneath the marsh or laying on the marsh near the shoreline so maintenance can be performed from the water.

All proper public notice procedures are followed. No local concern permits issued during this reporting period required a full growing season condition prior to determining mitigation. Typically, Jefferson LCUP conditions are similar to OCM, but are slightly tailored to its own needs, e.g. Jefferson Parish includes specific language for all determinations issued in regard to any project being located on any Jefferson Parish servitude/right-of-way/property.

Field investigations are conducted on a case by case basis, depending on the type of project, known field area knowledge, and current aerial and/or ground imagery. At times, a preliminary assessment is performed in order to identify if OCM assistance is needed or to meet with applicants at their request to

clarify specifics on the project and location. Jefferson works closely with the OCM Field Biologist and Mitigation staff, and requests their assistance when needed.

For enforcement issues, Jefferson LCMP typically assesses the project site and works with the applicant to submit a Joint Permit Application for an After-The-Fact permit in order to obtain compliance. This may include mitigation depending upon habitat impacts. Jefferson took the initiative several years ago to prevent permit applicants from beginning projects prior to obtaining a Coastal Use Permit. With the assistance of the Jefferson Parish Department of Inspection and Code Enforcement, a person cannot obtain a building permit prior to obtaining the proper permits from the U.S. Army Corps of Engineers (COE) and the Jefferson LCMP. The Code Enforcement Department provides a checklist of names and agencies for the applicant to contact, which insures that the individual obtains all the proper permits. Jefferson Parish was a forerunner for the other LCMPs in this matter.

Jefferson LCMP consistently uses the NAJ Guidance Document on OCM's website, and consults with OCM when needed when drafting letters to applicants for correctness, or to gain clarification on specific language. Jefferson feels that the NAJ Guidance Document is lengthy and extremely difficult for applicants to understand. A summary document in simpler language would be better suited to applicants. The same can be applied to the HMIA Guidance.

Jefferson LCMP works diligently with applicants to avoid and/or minimize wetland impacts. Typically, they are contacted by the applicant prior to submittal of a Joint Permit Application. At the beginning of the conversation, the applicant is asked to avoid wetland impacts if practical, and if not practical, work to minimize impacts. The same process is carried out when working with an applicant that has submitted a Joint Permit Application. These measures are properly reflected in the code sheets. Jefferson LCMP believes they are receiving proper mitigation assistance from the state but feels more training can always be beneficial. Jefferson LCMP believes the current pandemic crisis has made reaching applicants and the COE more difficult but that OCM has remained consistently available.

LCMP Managers Meetings and Additional Items

A representative from the Jefferson Parish LCMP has been in attendance at all the LCMP manager's 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.

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, and has no marinas involved in the Louisiana Clean Marina Program.

Permit Decisions

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

Parish Comments

I have reviewed the Periodic Review Report for 2018-2020, and have no comments to provide. The report is fine. (Jason Smith, LCMP Manager)

Lafourche Parish

The Lafourche Parish periodic review meeting was held on March 4, 2021. Representing Lafourche Parish was Amanda Voisin, Coastal Program Director. Sara Krupa, Mark Hogan and Jon Truxillo represented OCM. There were no public comments received by the parish or OCM.

Action Items from Previous Periodic Review 2016/2018
Suggested Action Item: Lafourche LCMP staff should continue to familiarize themselves with necessary resources in an effort to conduct independent field investigations.
Result: Resolved Lafourche LCMP has been doing an admirable job in learning how to conduct independent field investigations. The LCMP conducted numerous field investigation on their own this year. OCM will continue to provide field investigation training to the LCMPs.
Action Items from Current Periodic Review 2018/2020
No recommended or necessary action items

Parish Requests

Lafourche Parish expressed that they are satisfied with state program’s assistance. Lafourche stated that state assistance to the Parish has always been available whenever needed. Even with the limited schedules due to COVID, they were provided with ample assistance in an efficient manner from the LCMP contact with LDNR. There are no specific changes or actions recommended. Lafourche LCMP continues 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 Coastal Program Director. Lindsey Dufrene is no longer working for Lafourche Parish, and the office hired Megan Dufrene as the CZM Permit Coordinator in May 2020. Ms. Dufrene 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 Advisory Committee. 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 Lafourche Parish 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. Lafourche LCMP comments remain the same from last periodic review. The difference in timeframes for issuing permits between LCMPs and the Corps sometimes results in a delay in processing times; however, they feel that they are still able to issue permits in a timely manner.

Program Processes and Permit Issues

There were 30 uses of local concern transmitted to and 25 authorizations issued by the LCMP this review period; 208 uses of state concern were transmitted to the LCMP for comment. One authorization this period required a one year growing season conditions to assess impacts to vegetated wetlands. There were no instances of assigned compensatory mitigation issued this period; however, Lafourche continued excellent coordination and monitoring of mitigation that has been assigned in previous periods and has several applications currently in the assessment process, often as part of ongoing enforcement concerns. Lafourche LCMP is to be commended for exceptional mitigation assessment and coordination. The Lafourche LCMP continues to gain confidence in their ability to conduct independent field investigations.

All public notice procedures were properly followed by Lafourche LCMP. A list of all current and past LCUP permits is kept and updated to reflect permit status, as well as, one year growing season conditions. Pre and post ground or aerial photo conditions are included as part of growing season conditions. Growing season notifications are set as reminders in the Microsoft Outlook calendar system. Special conditions are included in many parish LCUP authorizations. Minimization and avoidance of adverse impacts are taken into consideration when processing LCUPs. If a potential violation occurs, they conduct a preliminary site visit. If it's noticed that there has been a violation, they gather landowner information through the Parish Tax Assessor's website and send them an enforcement letter to complete a Joint Permit Application for the work that was done.

The LCMP always requires a Needs, Alternatives, and Justification review from the application if there are proposed impacts, any reasonable alternatives are reviewed and considered prior to issuing a LCUP with impacts. Any applicable measures taken to minimize and avoid adverse impacts would be reflected in the disturbed acres proposed, disturbed acres submitted and disturbed acres issued fields of the impacted habitat form code sheet. The Lafourche LCMP has excellent procedures for requiring Needs, Alternatives, and Justification (NAJ) and Hydrological Modification Impact Analyses (HMIA) from applicants. LCMP staff often utilize Lafourche NAJ and HMIA request examples when giving instruction to other parish LCMPs. Lafourche LCMP is including BODs in their files.

LCMP Managers Meetings and Additional Items

Lafourche had representation at all LCMP meetings this period and would be interested in hearing about other parish's use of RESTORE Act and GOMESA funding, in addition to further field investigation training. The LCMP did not have any recommendations/suggestions for the LCMP handbook. Amanda is an active participant in state coastal restoration and protection efforts. Outreach and education is conducted through their Floodplain Management Department. Lafourche has one marina in the Louisiana Clean Marina Program. There are no plans in the immediate future to certify any others.

Permit Decisions

Lafourche LCMP’s permit decisions have been consistent with the state program, the state guidelines and its programmatic document. Lafourche conducted numerous field investigations without OCM assistance and continued processing of numerous enforcement cases this period. Lafourche is running a first-rate and very effective LCMP. Both Amanda and Megan are to be commended for their excellent efforts.

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. Our office looks forward to coordinating with OCM in our efforts to ensure that we are running a successful local coastal program. We would also like to thank you, Jon, for being willing to assist our program, and you continue to be a great resource for Megan and me. Thank you, (Amanda Voisin, LCMP Administrator)

Orleans Parish

The Orleans Parish periodic review meeting was held on March 18, 2021, Bradly Klamer, Assistant Floodplain Program Manager, represented Orleans Parish. Sara Krupa, Mark Hogan and Jon Truxillo represented OCM. There were no public comments received by the parish or OCM.

Action Items from Previous Periodic Review 2016/2018
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. Result: Resolved Orleans has submitted timely permit data this review period.
Necessary Action Item: Orleans must include Basis of Decision documentation in Local Coastal Use Permit (LCUP) files Result: Unresolved Orleans still needs to develop a process that includes BODs in all permit files
Necessary Action Item: Orleans Parish shall publish the final permit determinations in the official parish journal. Result: Unresolved Orleans still needs to publish final determinations.
Action Items from Current Periodic Review 2018/2020
Necessary Action Item: Orleans must include Basis of Decision documentation in Local Coastal Use Permit (LCUP) files

Necessary Action Item: Orleans Parish shall publish the final permit determinations in the official parish journal.
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Necessary Action Item – If applicable to the activity, Orleans must require a NAJ and/or HMIA
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Parish Requests

The City of New Orleans stated they are satisfied with assistance from the OCM. They did not recommend any changes to state/local program interaction. It was evidenced as a result of this period's review that Orleans LCMP is still not including Basis of Decision documentation in the Coastal Use Permit authorization files. OCM provided examples of Basis of Decision documentation to Orleans LCMP. Orleans LCMP had some questions regarding Christmas Tree Marsh Restorations Projects. OCM answered these questions to the best of its ability and put Orleans LCMP in touch with Jefferson LCMP. Jefferson LCMP is an expert in these projects.

Program Administration

There were no reported changes in program administration this review period. 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 and Coastal Zone Program Manager. Mr. Klamer fulfills most of the duties of the LCMP with assistance from Mr. Landry as needed. The parish is receiving notification from the state regarding State CUPS, Pre-Application and Geological Review (GR) Meetings. They have no complaints regarding OCM not addressing their concerns and found OCM readily accessible when needed.

Program Processes and Permit Issues

There were 21 uses of local concern transmitted to and 17 authorizations issued by the LCMP this review period. In addition, 46 uses of state concern were transmitted to the LCMP for comment. Orleans effectively assigned correct mitigation for three authorizations this review period. Orleans LCMP does an excellent job of using the minimization/avoidance sequencing process to eliminate impacts to wetlands and therefore avoid compensatory mitigation requirements whenever possible. Orleans performs excellent compensatory mitigation assessment analysis when required. The vast majority of Orleans Parish is in highly-developed, upland urban, fast-lands behind storm protection levees and most activities are exempt from OCM permitting. In addition, Orleans LCMP does not process a large number of LCUPS. Orleans Parish follows proper public notice procedures on applications for permits; however, Orleans LCMP has not been publishing public notice of final permit decisions. Publishing final decisions is important because the decision publication starts the ten-day appeals period time clock, after which permit decisions can no longer be appealed. In addition, Orleans LCMP is not requiring NAJ or HIMA documentation in the permit files.

Necessary Action Item – Orleans LCMP must publish final decisions of all authorizations.

Necessary Action Item – If applicable to the activity, Orleans must require a NAJ and/or HMIA.

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

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 this review period. The Orleans LCMP has good procedures for avoidance and minimization of wetland impacts; they strive to

ensure applicants correctly reflect activities in the application and that projects are built according to application specification. Orleans utilizes construction inspections and final certificate of occupancy procedures to monitor permit activity completion and adherence to permit conditions. Orleans LCMP has begun issuing Letters of No Objection on State Concern CUPs when requested to do so by the applicant. They do not charge a fee for these letters. Orleans LCMP has done a very good job utilizing the LCMP Field Investigation Report Form and performs top-notch mitigation assessment analysis. Orleans LCMP has not had any enforcement actions this review period. Challenges faced this review period are: applicants not knowing mitigation requirements and applicants having difficulty in correctly modifying/revising their plats. Orleans LCMP makes excellent use of the LCMP Handbook and the on-line electronic instructions and forms.

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 Louisiana’s first dual certified: Louisiana Clean Marina and Gulf of Mexico Alliance (GOMA) Clean and Resilient Marina. Orleans Parish conducts/publishes CRS Activities, Storm Water and Flood Preventions Outreach. Orleans is investigating conducting Marsh Restoration Christmas Tree projects.

Permit Decisions

Orleans Parish’s permit decisions have been consistent with its programmatic document and the state program. Orleans Parish is following the Louisiana Coastal Use Guidelines and Orleans 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.

Parish Comments

Thank You, Orleans will work to correct the inconsistencies. (Jerome Landry, Floodplain Administrator)

Plaquemines Parish

The Plaquemines Parish periodic review meeting was held on March 24, 2021, Robert Spears, GIS Manager/Acting Coastal Program Manager, represented Plaquemines Parish. Sara Krupa, Mark Hogan and Jon Truxillo represented OCM. There were no public comments received by the parish or OCM.

<p>Action Items from Previous Periodic Review 2016/2018</p> <p>Suggested Action Item: Plaquemines Parish should officially designate a parish position responsible for LCMP administration duties.</p> <p>Result: Unresolved</p> <p>Plaquemines has not designated a specific position to LCMP duties. Financial difficulties in Plaquemines Parish are expected to continue to prevent Plaquemines from being able to designate a staff position towards LCMP Administrator in the foreseeable future.</p>
<p>Necessary Action Item – Plaquemines must include Basis of Decision documentation in Local Coastal Use Permit (LCUP) files.</p>

Result: Resolved
Plaquemines began including BODs in LCUP permit files this review period.

Action Items from Current Periodic Review 2018/2020

Necessary Action Item - Plaquemines must strive to submit contract deliverables in a timely manner.

Parish Requests

Plaquemines Parish stated that they are always satisfied with the working relationship with all OCM personal and thanked them for the way they have handled the COVID-19 crisis and remained consistently available while working remotely. The parish stated additional mitigation assessment training would be appreciated, and also information on how state lands and water-bottoms are delineated by the Office of State Lands especially in regards to erosion. OCM will supply this information.

Program Administration

The Plaquemines LCMP continued under the supervision of Mr. Spears this report period, and 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. This review period contract deliverables, especially permitting data, was not submitted in as timely a fashion as last period. OCM is aware of the difficulties imposed upon a parish LCMP that does not have a staff person specifically allocated to LCMP administration; however, Plaquemines LCMP should strive to submit contract deliverables in a timelier manner.

Necessary Action Item - Plaquemines must strive to submit contract deliverables in a timely manner.

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. The parish is receiving notification from the state regarding State Concerns, Pre-Application and Geological Review (GR) Meetings. On occasion Plaquemines LCMP comments to OCM about State CUPs and other concerns and they have been addressed in a timely manner by OCM and by the LCMP Coordinator. They have not adopted any new coastal ordinances.

Program Processes and Permit Issues

There were 26 uses of local concern transmitted to and 24 authorizations issued by the LCMP this review period; 285 uses of state concern were transmitted to the LCMP for comment. Plaquemines did not have any authorizations that required mitigation or one year growing season mitigation waiting conditions this review period. All LCUP applications are placed on 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 often re-inspected after project completion. Plaquemines LCMP is very proactive in minimizing impacts through the sequencing process of avoidance and minimization of impacts. They require pre and post photography in one year growing season conditions, in addition to conducting pre and post project field investigations of the site. They sometimes ask for OCM field biologist assistance on site investigations particularly for enforcement activities. They are properly utilizing the LCMP Handbook and electronic forms. They require NAJs and HMIA's when appropriate. As stated they have started including BODs in the permit files. They have no negative issues to report with other local, state or federal agencies, however, they did express that the COVID-19 pandemic put a strain on working environments and personal lives. Plaquemines Parish is experiencing hard financial times and has had to

layoff personnel and eliminate entire departments. Existing departments have had to pick up the slack and assume the duties of positions that have been eliminated. OCM appreciates their efforts under these difficult circumstances.

LCMP Managers Meetings and Additional Items

Plaquemines attends all meetings and training classes sponsored by OCM and actively participates. Plaquemines has one approved Louisiana Clean Marina. 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: BTNEP, Ducks Unlimited, LSU Sea Grant, Meraux Foundation and organizations such as LASAFE and CPRA.

Permit Decisions

Plaquemines Parish's permit decisions have been consistent with its programmatic document and the state program. Plaquemines Parish is following the Louisiana Coastal Use Guidelines and Plaquemines Parish Enforceable Policies when permitting applications for activities in the parish. Plaquemines is operating a good coastal program and will continue to work with OCM in the upcoming period to identify and correct any program discrepancies should they arise. Mr. Spears and Ms. Clark are to be highly commended for their hard work and dedication.

Parish Comments

Plaquemines Parish concurs with the evaluation from DNR on the Periodic Review of our program. And we hope to find someone whom we can hire to preform the work of the LCMP permanently in the near future. As always thanks for all the help DNR / OCM provides to all the coastal parishes. (Robert Spears, Acting LCMP Administrator)

St. Bernard Parish

The St. Bernard Parish periodic review meeting was held on March 3, 2021. John Lane, Executive Director of Coastal Operations, represented St. Bernard Parish. Sara Krupa, Mark Hogan and Jon Truxillo represented OCM. There were no public comments received by the parish or OCM.

Action Items from Previous Periodic Review 2016/2018
Necessary Action Item : St. Bernard Parish LCMP must include Basis of Decision Documentation (BOD) in their LCUP files.
Result: Resolved St. Bernard began including BODs in their permit files this period.
Action Items from Current Periodic Review 2018/2020
No recommended or necessary action items

Parish Requests

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

Program Administration

This review period John Lane began in the role of Coastal Zone Administrator, replacing William McCartney. John now handles all LCMP duties. John has done an admirable job of learning how to properly operate a parish LCMP. John has been timely with data submissions and contract deliverables. John has been diligent in his interactions with applicants and other agencies in order to monitor applications and other program aspects. He is to be commended for his efforts to improve LCMP operation in the parish. St. Bernard has developed a process whereby parish permits are run through the building permit database so that parish inspectors in the building department can oversee all parish permits for completion progress and adherence to all permit conditions and to ensure all necessary permits are obtained. St. Bernard Parish did not adopt any new coastal ordinances this review period. St. Bernard has a CZM committee made up of representatives from various coastal resources user groups.

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 agency. They are receiving proper notice of state concerns, pre-application meetings, etc. from the state. They have not had objections on any state concerns this period. The parish also did not have any enforcement activities this period.

There were five uses of local concern transmitted to the parish and ten authorizations issued by the LCMP this review period. There were 80 uses of state concern transmitted to the LCMP for comment. St. Bernard did not issue any permits that required mitigation this review period. The parish is following proper public notice procedures. 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 include conditions with notification of work initiation and completion requirements. The St. Bernard LCMP is following proper public notice procedures. There was one field investigation conducted with OCM assistance this review period. The parish has a coastal inspector that ensures projects are completed in compliance with their permit authorization. The parish has been receptive to assistance with field investigation and mitigation assessment assistance. OCM will work with the parish when these needs arise. The parish is working with applicants to minimize impacts from permitted activities.

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 this review period. Contract deliverables are properly prepared and submitted on time. OCM will continue coordination and individual training with parish personnel. John has been very receptive to additional training and working with OCM on proper program operation. He has done an excellent job stepping into the role as the LCMP administrator.

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 working with partners on restoration activities and education and outreach activities. The parish conducts outreach in schools and 4H Clubs and conducts wetland plantings with citizens. The parish currently has no marinas participating in the Louisiana Clean Marina Program. The parish is utilizing the on-line LCMP handbook and other LCMP on-line resources.

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 progress in all areas of program operation this review period and is to be commended for its improvement and John’s receptiveness to training.

Parish Comments

I am satisfied with the review. (John Lane, LCMP Administrator)

St. Charles Parish

The St. Charles Parish periodic review meeting was held on March 11, 2021. Earl Matherne, Planning Administrator represented St. Charles Parish. Sara Krupa, Mark Hogan and Jon Truxillo represented OCM. There were no public comments received by the parish or OCM.

Action Items from Previous Periodic Review 2016/2018
Necessary Action Item - St. Charles Parish LCMP must include Basis of Decision documentation (BOD) in their LCUP files. Result: Resolved St. Charles has begun including BODs in their permit files.
Recommended Action Item: - St. Charles LCMP should continue to remain enthusiastic and receptive to training. Result: Resolved St. Charles has remained very enthusiastic and receptive and has learned LCMP processes very well.
Action Items from Current Periodic Review 2018/2020
No recommended or necessary action items

Parish Requests

St. Charles states they are satisfied with the state assistance they have received so far; they stated that they have not been in operation long enough to have any highly significant suggestions for changes to OCM/LCMP interaction. As a relatively new LCMP, in operation three years, they appreciate all the assistance the state offers. They began a program improvement process based on the one-year review recommendations last period. The LCMP stated they are also very satisfied with the current level of mitigation assistance. St. Charles has done an excellent job of learning the mitigation process and routinely consults with OCM with questions or guidance as necessary.

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, and is a Certified Floodplain

Manager. St. Charles Parish did not have any new coastal ordinances this review period. They have been receiving proper notices from the state but have not commented on any state concerns. They have no issues to report with OCM or any other state or federal agency. The Parish has a CZM Committee, which consist of seven members appointed by the Parish Council. The committee has been in existence since 1979, well before the LCMP gained approval in 2017.

Program Processes and Permit Issues

There were nineteen uses of local concern transmitted to and thirteen authorizations issued by the LCMP this review period; 124 uses of state concern were transmitted to the LCMP for comment. St. Charles issued two LCUPs with growing season conditions and one that required mitigation this review period. 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 need arises. The parish LCUPs include special conditions when needed. St. Charles Parish LCMP is following all proper public notice procedures. They are currently utilizing email notification for follow-up investigations but are migrating to a prescribed permitting software system that will take over that function. They have a good field inspection process in place and a great deal of experience in field biology. They had one enforcement issue this period. 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 parish enforcement 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. The LCMP utilizes the on-line resources when it comes to NAJ and HMIA requests, and they have done a good job in this. St. Charles LCMP always attempts to minimize wetland impacts from permitted activities.

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 Louisiana Clean Marina Program. The parish is satisfied with the LCMP handbook and makes excellent use of other LCMP on-line resources.

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 sincere 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.

Parish Comments

Having reviewed the July 1, 2018 to June 30, 2020 Periodic Review Report as it pertains to St. Charles Parish, I offer no further comments and agree with the assessment of the St. Charles Parish Local Coastal Management Program. (Earl Matherne, LCMP Administrator)

St. James Parish

The St. James Parish periodic review meeting was held on March 12, 2021. , Permitting and Planning Supervisor, and Ryan Larousse, Assistant Parish Administrator, represented St. James Parish. Sara Krupa, Mark Hogan and Jon Truxillo represented OCM. There were no public comments received by the parish or OCM.

Action Items from Previous Periodic Review 2016/2018
<p>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.</p> <p>Result: Resolved</p> <p>There were administration changes in the parish government and staff changes in the LCMP this review period. OCM informed the new LCMP personnel of the problems that had been occurring under the old Parish Administration/LCMP staff and the new parish personnel have worked diligently to correct these problems. The St. James LCMP began using the proper authorization templates provided by OCM this period. The new staff did have questions about asking applicants with State Concern Applications in St. James Parish to appear before the Parish Council and OCM informed the parish that they couldn't use LCMP authority to do so.</p>
<p>Necessary Action Item: – St. James must include Basis of Decision documentation in Local Coastal Use Permit (LCUP) files.</p> <p>Result: Unresolved</p> <p>St. James LCMP is still working on developing this procedure but is not yet in compliance; OCM will continue to assist in this matter.</p>
Action Items from Current Periodic Review 2018/2020
<p>Necessary Action Item: – St. James must include Basis of Decision documentation in Local Coastal Use Permit (LCUP) files.</p>

Parish Requests

St. James is satisfied with OCM assistance but stated they would like to see more training classes and workshops. Most training with St. James LCMP has been one on one. OCM will continue offering opportunities for more group training either virtually or maybe in a group setting . St. James has done an admirable job learning how to operate a successful LCMP.

Program Administration

Marrill McKarry became Assistant Coastal Zone Administrator in February 2020. The St. James Parish Local Coastal Program is administered by Parish President, Mr. Rick Webre as of February 2020. Program coordination and reports are completed by Marrill McKarry. Marrill assists Mr. Webre with inspections and permitting of activities within the Parish Coastal Zone.

Mr. Webre 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. Marrill McKarry develops all CZM activities and prepares materials for the monthly meetings and administration of the CZM Program.

The CZM Advisory Committee is composed of eight members – one member from each council district, appointed by the Parish Council, and serve at the pleasure of the council, and one member appointed by the Parish President.

Program Processes and Permit Issues

The operation of the St. James Parish LCMP has vastly improved since the 2016/2018 review period. There were eight uses of local concern transmitted to and nine authorizations issued by the LCMP this review period; 81 uses of state concern were transmitted to the LCMP for comment. St. James LCMP issued one LCUPs with a growing season condition and one that required mitigation this review period. The mitigation issued was the first approved individual mitigation plan ever reviewed and permitted by an LCMP. This was a prodigious task and the LCMP is to be commended. There were no new ordinances this period. The parish is receiving proper notification on state concerns from OCM but has not commented on any. There were no specific issues with OCM or other state or federal agencies; however, the parish feels in light of the current pandemic situation that LCMP deadlines were difficult to meet. However, St. James LCMP met almost all program deadlines in a reasonable manner this period.

St. James LCMP is following proper public notice procedures. A number of enforcement actions were properly processed this review period. The LCMP Administrator promptly takes whatever investigatory action is necessary in order to ascertain whether or not an activity is un-permitted. When state or local officials become aware of a possible violation, they contact the Local Parish Administrator. A letter of warning is sent and describes the observations of the inspector, identifies the corrective actions that may be taken to come into compliance, provides a date by which the corrective actions must be made and identifies the provisions of the coastal zone management program in violation. St. James conducts regular inspections of all permitted activities to ensure compliance with permit conditions. The Parish Permitting and Planning Supervisor is responsible for investigating permitted activities and final inspections of completed projects.

The parish is including special conditions in their LCUPs such as: mitigation conditions, wildlife diversity program and Chitimacha Indian grounds. The parish is doing an admirable job conducting field investigations for LCUP applications; however, they expressed interest in further training sessions. They are in the process of learning NAJ and HMIA requirements and will be receiving further training from OCM. OCM will work with St. James LCMP on minimization of impacts. They have yet to develop satisfactory BOD protocols.

LCMP Managers Meetings and Additional Items

St. James Parish LCMP was well represented at local coastal LCMP meetings and other OCM sponsored programs. They are making proper use of the LCMP Handbook and other on-line LCMP resources. 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

St. James Parish’s permit decisions have been consistent with the state program and its programmatic document. St. James Parish is following the Coastal Use Guidelines and the parish LCMP programmatic document when permitting applications for activities in the parish. St. James Parish is making good progress in becoming consistent in all areas of program operation and is to be commended for their receptiveness to training and the program’s vastly improved operation.

Parish Comments

No Comments (Marrill McKarry, LCMP Administrator)

St. John the Baptist Parish

The St. John the Baptist Parish periodic review meeting was held on March 3, 2021. René Pastorek, Planning and Zoning Director, Devin Foil, Coastal Zone Administrator, and Wesley Gillen, Graduate Assistant, represented St. John the Baptist Parish. Sara Krupa, Mark Hogan and Jon Truxillo represented OCM. There were no public comments received by the parish or OCM.

Action Items from Previous Periodic Review 2016/2018
There are no action items from the previous period because this is the St. John the Baptist Parish LCMP’s first review. St. John the Baptist Parish LCMP was approved and began operation in 2018.
Action Items from Current Periodic Review 2018/2020
No recommended or necessary action items

Parish Requests

St. John the Baptist LCMP is satisfied with OCM assistance and stated they would like to see more training on an individual basis, as well as, more classes and workshops. A formalized training orientation for LCMP managers that introduces managers to the program as a whole would be especially welcome. Individual training topics requested by the LCMP include: 1) training regarding internal OCM program processes, 2) training regarding utilizing SONRIS data for local program use in ArcGIS or Google Earth, 3) training creating shape-files and keyhole markup language (KML) files and 4) training regarding wetland species identification.

Most training with St. John the Baptist LCMP to date has been one on one. OCM will explore the opportunities for more group training either virtually or possibly in a group setting. St. John the Baptist LCMP has done a most admirable job learning all the necessary information required for successful LCMP operations. The parish has provided contract deliverables in a timely manner. St. John the Baptist LCMP has done a great job getting a new program up and operating at a most acceptable level.

Program Administration

St. John the Baptist Parish’s Coastal Zone Management Program changed personnel since initial operation in June 2018. Devin Foil, the LCMP manager, succeeded Evelyn Campo. Devin leads the Coastal & Water Management Division, a newly created division in the Parish’s Planning & Zoning Department since June 2018.

This review period St. John the Baptist Parish adopted two new ordinances on local coastal management in the parish. The first was the adoption of the Environmental Conservation District (ECD) zoning district. After the adoption of the ordinance, the parish designated much of the lands in its northern portion as the ECD zone. Most of these lands are wetlands below the 5 ft. contour. The second ordinance formally adopted is the St. John the Baptist Adaptation Strategy as the parish's official adaptation and resilience strategy. The strategy calls for conservation of wetlands, responsible water management, etc. The parish CZM Advisory Committee is composed of nine members. Six represent specific coastal resources of the parish and three are at large positions.

Program Processes and Permit Issues

The operation of the St. John the Baptist Parish LCMP was excellent this review period. The LCMP staff are extremely knowledgeable and capable and assimilated understanding of program operations at an extremely fast pace. There were 27 uses of local concern transmitted to, and 15 authorizations issued by, the LCMP this review period; 45 uses of state concern were transmitted to the LCMP for comment.

St. John the Baptist LCMP issued one LCUP requiring compensatory mitigation, and one LCUP issued was with a growing season condition this review period. The parish is receiving notification on state concerns from OCM but had a concern as a result of an attempt to comment on-line and received an apparent error message. OCM and the parish investigated the issue but were unable to duplicate the error message. We will continue to monitor the situation together to ensure that parish comments are being received by OCM. There were no issues with OCM's response to comments. This period there were many local concern pre-application meetings conducted by the parish.

St. John the Baptist LCMP is following proper public notice procedures. Two enforcement actions were properly processed this review period. The Parish conducts routine inspections of permitted activities to ensure compliance with permit conditions. The parish is including special conditions in their LCUPs such as: mitigation conditions, wildlife diversity program and Chitimacha Indian grounds. The parish is doing an admirable job conducting field investigations for LCUP applications; however, they expressed interest in further training sessions. They are doing an outstanding job on NAJ and HMIA requirements and have generated some excellent request for information letters that may serve as examples other LCMPs can follow. The parish works with applicants on minimization of wetlands impacts and OCM will continue to work with St. John the Baptist LCMP to refine this process. They have developed satisfactory BOD protocols but had questions as to the document's function and purpose, which OCM clarified.

LCMP Managers Meetings and Additional Items

St. John the Baptist Parish LCMP was well represented at local coastal LCMP meetings and other OCM sponsored programs. They are making good use of the LCMP Handbook and other on-line LCMP resources. The parish suggested additional training as topics for future quarterly meetings e. g. orientation for the LCMP program, using the LCUP to complement local land use and floodplain regulations and enhancing LCUPs with additional OCM programs, e.g. focused water quality concerns. The parish does not have any operating marinas for inclusion in the Louisiana Clean Marina Program. St. John the Baptist Parish participates in public education and outreach for flood prevention and the Community Rating System (CRS) program.

Permit Decisions

St. John the Baptist Parish’s permit decisions have been consistent with the state program and its programmatic document. St. John the Baptist Parish is following the Coastal Use Guidelines and the parish LCMP programmatic document when permitting applications for activities in the parish. St. John the Baptist Parish is making great progress in becoming consistent in all areas of program operation and is to be commended for their receptiveness to training and the program’s excellent operation, especially considering it is a new program in the early operations phase.

Parish Comments

Thanks for the nice review. (René Pastorek, Planning and Zoning Director; Tara Lambeth, LCMP Administrator)

St. Tammany Parish

The St. Tammany periodic review meeting was held on March 25, 2021. Sabrina Schenk, Watershed Coordinator, represented St. Tammany Parish. Sara Krupa, Mark Hogan and Jon Truxillo represented OCM. There were no public comments received by the parish or OCM.

Action Items from Previous Periodic Review 2016/2018
There were no recommended action items from the previous review period.
Action Items from Current Periodic Review 2018/2020
No recommended or necessary action items

Parish Requests

St. Tammany LCMP stated that they are satisfied with state information and assistance provided. They find OCM staff made themselves consistently available even during the COVID-19 emergency through telephone and email. They had no requests for any changes in the state/local program coordination area. St. Tammany LCMP stated that they will begin updating the CZM ordinance and would like assistance and draft review. They stated that OCM should continue with the excellent support and training that they currently do provide.

Program Administration

Ms. Sabrina Schenk is the LCMP Administrator/Watershed Coordinator. Ms. Schenk assumed the program’s operation during the last review period. In addition to reviewing all LCUP applications and supplying OCM with the LCMP’s deliverables, Ms. Schenk is also responsible for Watershed Management, Storm Water Controls and Engineering, including the review of local building permits and large developments. There were no new coastal regulations adopted by the parish, but the fee schedule for local coastal review was increased to better support the program. The parish CZM ordinance is currently under review for potential changes. St. Tammany comments on state concern permits in their parish if necessary and feels their comments are adequately considered. There was an instance this period where OCM added a condition to the State CUPs in St. Tammany to address a parish ordinance. There were no state concern pre-application or GR meetings this review period.

Program Processes and Permit Issues

There were 426 uses of local concern transmitted to and 393 authorizations issued by the St. Tammany LCMP this review period; 70 uses of state concern were transmitted to the LCMP for comment. St. Tammany had one LCUP with mitigation conditions and one that required a growing season condition. Ms. Schenck stated that OCM adequately assists with wetland mitigation for unavoidable impacts and is very adept and timely with their assistance. Ms. Schenck proactively educated other parish permitting departments and the parish citizens about the benefits of obtaining written LCUP authorizations.

The LCMP utilizes an online permit database for building permits and coastal permits monitoring. The sites are tracked to completion via the database and each site is inspected at least twice. The inspections reports are kept in the database. Any coastal issues are reported directly to the LCMP. Ms. Schenk makes very 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. The St. Tammany LCMP is making excellent utilization of the Hydrologic Modification Impact Analysis and the Needs, Alternatives and Justification processes. They include Basis of Decision documentation in files.

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 do an excellent job of placing special conditions in their permit authorizations. 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. St. Tammany has been doing an excellent job following the process to avoid and minimize impacts from permitted activities. They document these impact reductions 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 do an excellent job utilizing the LCMP handbook and other on-line resources. Outreach activities include: community resiliency, nonpoint source pollution prevention and flood prevention. The parish has four Louisiana Clean Marina participants and would like to see all marinas participate. For additional training they suggested a LCUP 101, back to basics, refresher course. They stated the biggest challenge this review period involved working during the COVID-19 emergency.

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 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 appreciate the support and guidance provides and is looking forward to another good year with the LCMP. (Sabrina Schenk, LCMP Administrator)

Terrebonne Parish

The Terrebonne Parish periodic review was held on February 5, 2021. Mr. Mart Black, Terrebonne Parish Director of Coastal Restoration and Management, and Ms. Vicki Summers, Administrative Secretary,

represented the parish. Sara Krupa, Mark Hogan and Jon Truxillo represented OCM. There were no public comments received by the parish or OCM.

Action Items from Previous Periodic Review 2016/2018
There were no recommended or necessary action items from the previous review period.
Action Items from Current Periodic Review 2018/2020
No recommended or necessary action items

Parish Requests

The Terrebonne Parish Office of Coastal Restoration and Preservation (TPOCRP) states that they are extremely satisfied with the level of assistance they have received from OCM during the reporting period. Assistance has been forthcoming when needed, not only from the OCM staff in Baton Rouge, but also from the local OCM field biologist and the OCM mitigation coordinator when requested. They had no specific changes or actions to recommend regarding state/local program coordination/interaction. They stated that additional training in field investigation and plant identification would be welcome.

Program Administration

The TPOCRP 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. Mr. Black also was appointed by the Terrebonne Parish Council as the official Custodian of Public Records for the parish and he also functions as the Public Information Officer and the Coastal Restoration Director when the Terrebonne Parish Emergency Operations Center is activated.

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 and serves as secretary for the TPOCRP. Ms. Summers also supplements staff at the parish Emergency Operations Center when this facility is activated in the event of an emergency. Terrebonne has a Coastal Zone Management Committee that serves in an advisory capacity. The CZM Committee has nine members. Terrebonne Parish did not adopt any new coastal ordinances this period. The LCMP did not comment on any state concerns this review period.

Program Processes and Permit Issues

There were 35 uses of local concern transmitted to and 38 authorizations issued by the LCMP this review period; 208 uses of state concern were transmitted to the LCMP for comment. Two 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. One authorization contained a growing season condition. All proper public notice procedures are followed.

Terrebonne performs LCUP completion and adherence inspections on a selected basis. They attended one geological review meeting this period. If permit applications go into lengthy processing times, and/or requires additional information that goes without submission, the LCMP will pursue forced withdrawal of the applicaton. Terrebonne LCMP is placing appropriate special conditions in their permit authorizations. They utilize both re-inspection and aerial photograph conditions for one growing season conditions. Field investigations are primarily handled by Mr. Black and if necessary the OCM Field Biologist is asked to

assist. Mr. Black states that part of the problem with field assessments is that they are fairly infrequent and that leads to a deterioration in field assessment skills. Determination of potential enforcement or violation activities usually relies on complaints from citizens, follow-up investigations and OCM referrals. Terrebonne makes good use of the NAJ and the HMIA guidance and was the forerunner in the development and utilization of LCMP BOD documentation.

Mr. Black stated that he considers it a very important task to work with applicants to minimize and avoid adverse impacts during the permitting review process. He functions as the local liaison between OCM and the COE and provide as much assistance to the applicant as possible in completing the LCUP application process. Mr. Black makes every effort to accurately reflect this on the habitat form code sheet. He has experienced times when the public has commented on the necessity of the LCUP/CUP process and he tasks himself with talking with the public and explaining why the process is important.

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 including a LCMP Managers' Meeting at a wetland site. They do an excellent job utilizing the LCMP handbook and other on-line resources. Terrebonne Parish has one marina participating in the Louisiana Clean Marina Program. Most outreach in the parish is handled by the Terrebonne Planning Department. However, the LCMP has developed a brochure regarding coastal use permitting in Terrebonne Parish. The brochure describes the permit process, types of permits, compensatory mitigation, and why LCUP/CUP permitting is important.

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. Mr. Black and Ms. Summers are dedicated to the LCMP program and the wellbeing of Terrebonne Parish citizens. Terrebonne Parish is running an outstanding program.

Parish Comments

The Terrebonne LCMP Report is accurate. (Mart Black, Terrebonne Coastal Restoration and Management Director)