U.S. Department of Housing and
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National Environmental Policy Act
Draft Environmental Assessment
U.S. Department of Housing and Development
Title 24 Code of Federal Regulation Part 58

Cameron Parish Policy Jury
Cameron Gravity Drainage District #3
Pump Station Elevation Project
Louisiana Office of Community Development
Community Development Block Grant
Disaster Recovery
Louisiana Resilient Infrastructure Program
Project # 12LDRC7702

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APPENDIX – EXHIBITS

LIST OF ACRONYMS

AI	Agency Interest
AMSL	Above Mean Sea Level
APE	Area of Potential Effect
ARPA	Archaeological Resource Protection Act
ASCE	American Society of Civil Engineers
BA	Biological Assessment
BCE	Before the Common Era
BFE	Base Flood Elevation
BGEPA	Bald and Golden Eagle Protection Act
BMP	Best Management Practices
CAA	Clean Air Act
CATEX	Categorical Exclusions
CBRA	Coastal Barrier Resources Act
CBRS	Coastal Barrier Resources System
CCP	Comprehensive Conservation Plan
CDBG	Community Development Block Grant
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CHHA	Coastal High Hazard Area
CLP	Calcasieu Loop Pass
CPPJ	Cameron Parish Police Jury
CPRA	Louisiana Coastal Protection and Restoration Authority
CRMS	Coastwide Reference Monitoring System
CSC	Calcasieu Ship Channel
CUP	Coastal Use Permit
CWA	Clean Water Act
CWPPRA	Coastal Wetlands Planning, Protection, and Restoration Act
CYS	Cubic Yards
CZMA	Coastal Zone Management Act
dBA	Decibels
DNL	Day-Night Average Sound Level
DR	Disaster Recovery
EA	Environmental Assessment

EFH	Essential Fish habitat
EIS	Environmental Impact Statement
EO	Executive Order
ERMA	Emergency Response Management Application
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FFRMS	Federal Flood Risk Management Standards
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Maps
FMP	Fisheries Management Plan
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
FWCA	Fish and Wildlife Coordination Act
GHG	Greenhouse Gases
GIWW	Gulf Intracoastal Waterway
GMFMC	Gulf of Mexico Fishery Management Council
GPS	Global positioning system
HABS	Historic American Buildings Survey
HAER	Historic American Engineering Record
HFCs	Hydrofluorocarbons
HUD	United States Housing and Urban Development
IPaC	Information for Planning and Consultation
JDEC	Jefferson Davis Electric Cooperative, Inc.
LaDOTD	Louisiana Department of Transportation and Development
LAOCD	Louisiana Office of Community Development
LADOA	Louisiana Office of Cultural Development Division of archaeology
LCRP	Louisiana Coastal Resources Program
LC&E	Louisiana Department of Conservation and Energy (formerly LDENR)
LDEQ	Louisiana Department of Environmental Quality
LDENR	Louisiana Department of Energy and Natural Resources (now LC&E)
LDWF	Louisiana Department of Wildlife and Fisheries
LMI	Low to Moderate Income
LNG	Liquefied Natural Gas
LNHP	Louisiana Natural Heritage Program

LPDES	Louisiana Pollutant Discharge Elimination System
LWIP	Louisiana Watershed Initiative Program
MBTA	Migratory Bird Treaty Act of 1918
MM	Millimeters
MOA	Memorandum of Agreement
MSA	Magnuson-Stevens Fishery Conservation and Management Act
MS4	Municipal Separate Storm Sewer System program
NBEM	National Bald Eagle Management
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NGVD	National Geodetic Vertical Datum
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NP	Nonpoint Source Discharge
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
NWR	National Wildlife Refuge
OCD	Louisiana Office of Community Development
OCM	Louisiana Office of Coastal Management (now Office of Permitting & Compliance)
OPC	Louisiana Office of Permitting and Compliance (formerly OCM)
OSHA	Occupational Safety and Health Administration
PCB	Polychlorinated Biphenyl
PEA	Programmatic Environmental Assessment
PFCs	Perfluorinated Compounds
PGP	Programmatic General Permit
PL	Public Law
PM	Particulate Matter
PS	Point Source Discharge
RCIP	Louisiana Resilient Community Infrastructure Program
RCRA	Resource Conservation and Recovery Act

REC	Record of Environmental Consideration
RHA	Rivers and Harbors Act
ROW	Right-of-Way
SDWA	Safe Drinking Water Act
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office
SPERP	Spill Prevention and Emergency Response Plan
SOV	Solicitation of Views
SSA	Sole Source Aquifer
SWMP	Storm Water Management Plan
SWPPP	Stormwater Pollution Prevention Plan
THPO	Tribal Historic Preservation Officer
TMDL	Total Maximum Daily Load
TSCA	Toxic Substances Control Act
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	Underground Storage Tank
VOCs	Volatile Organic Compounds

Environmental Assessment
Determinations and Compliance Findings for HUD-assisted Projects
24 CFR Part 58

Project Information

Project Name: CAMERON PUMP STATION ELEVATION PROJECT (Drainage Control Systems)

Responsible Entity: Cameron Parish Policy Jury (CPPJ)

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: B-21-DZ-22-0001/12LDRC7702

Preparer: Ellen Ibert, Royal Engineers and Consultants, LLC

Certifying Officer Name and Title: Katie Armentor, CPPJ Administrator

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable): Royal Engineers and Consultants, LLC

Direct Comments to: eibert@royal.us or karmentor@cameronpj.org

Project Location: Community of Cameron, Cameron Parish, Louisiana (Latitude 29.7956861, Longitude -93.3250666)

Description of the Proposed Project [24 CFR 50.21 & 58.32]**:** This is a drainage improvement project proposed for funding under the U.S. housing and Development (HUD), Louisiana Office of Community Development (OCD) Community Development Block Grant – Disaster Recovery (CBDG-DR), Louisiana Resilient Infrastructure Program (RCIP), and Cameron Parish Police Jury. It is Project # 12LDRC7702, Pump Station (Drainage Improvements) located in Cameron, Cameron Parish, Louisiana, with storm-water discharges into Calcasieu Loop Pass (CLP).

In general, the project consists of upgrading an existing stormwater drainage system that includes the following: installing two (2) water control pumps, one (1) water control structure to maintain road ditch water levels; installing two (2) catch basins; installing up to twenty-two (22) various sized culverts and digging approximately 3,750 feet of eleven (11) existing ditches along various roads. Approximately 5,390 cubic yards of material will be excavated, and 404 cubic yards of fill will be hauled in. Activities are proposed to provide flood relief to low and moderate income (LMI) residents within the basin areas of influence.

Specific project work consists of the following:

- Installing two (2) water control pumps – Pump Station A & Pump Station C – with pump station discharge outflow pipes at both locations discharging into Calcasieu Loop Pass (CLP).

  - Pump Station A (30”), approximate GPS location is at 29.7964076, -93.3258753. See permit sheet number 18 of Exhibit H.
  - Pump Station C (48”, 54”, and 72”) approximate GPS location is at 29.7919575, -93.3223617. See permit sheet numbers 22 and 23 of Exhibit H.

- Installing Control Structure B located at GPS 29.7953661, -93.3205492 in an existing drainage lateral consists of a new water control structure (Wakefield wall with three (3) screw gates two (2’) wide. See permit sheet numbers 20 and 21 of Exhibit H.) Installation of rock rip rap is included around the structure. An existing storm drain would be replaced along the eastside and parallel to Davis Road with discharge behind the weir. The existing Davis Road low-water bridge would be upgraded with a concrete bulkheads and concrete pile. An existing concrete box culvert would be modified by the replacement of an existing storm drain with a proposed four (4) feet by eight (8) feet box culvert along the west, parallel side of Davis Road. (See permit sheet 21 of Exhibit H)

- Installing berm with a flap-gated culvert located at Control Structure C (GPS 29.7953714, -93.3205557). Such consists of building berm (~404 cys) to re-establish approximately 200 linear feet of loss shoreline on CLP with one 24” diameter by 40’ flap-gated culvert. (See permit design detail “F’ on permit sheet 19 of Exhibit H). This work was completed but is included under this EA to consider cumulative effects.

- Ditch grading: Hydraulic dredging of open road-side ditches to grade ditch levels for maintenance and gravity drainage improvements and remove dredged soil for off-site disposal. (~5,390 cys dredged from Ditch #s. 1 to 13 being 11 total ditches). See permit design sheets for ditch details of Exhibit H, Exhibit A for GPS points, and Exhibit C for the excavation volumes by ditch and aerial map for referenced elements on design sheets.

- Remove and replace existing culverts under private driveway entrances from within existing drainage ditches proposed for mechanical bucket and grading as follows:

  - Ditch 12: Four (4) culvert replacements (upsize to 18” diameter).
  - Ditch 13: Four (4) culvert replacements (upsize to 18” diameter).

- New culverts:

  - Ditch 4: Grading and installing culverts (2 @ 18” x 464’) with drop intakes, remove excavated soils for disposal, backfill with fresh soil as needed, and grade the slope for the receiving of drainage into drop intakes. Ditch 4 is included in the Pump Station A area of influence. (See permit sheet 8 of Exhibit H)
  - Ditch 7: Grade and install culverts (2 @ 18” x 334’) with drop intakes, remove excavated soils, backfill with fresh soil as needed and grade the slope for receiving drainage into drop intakes. Ditch 7 is included in the Pump Station A area of influence. (See permit design sheet 11 of Exhibit H)
  - Six (6) new culverts installed under roadways will consist of excavating/grading and backfilling of soil to support appropriate drainage. Under roadways, culverts to be installed are demonstrated on Sheet 3 of Exhibit H and are defined as

follows:

- Leesburg Street (2) culverts – connecting ditch # 9 to ditch # 7 (see sheet 11), and connection from ditch # 5 to ditch # 4 (see sheet 9);
- McCall Street (2) culverts – connecting ditch # 1 to ditch # 2 (see sheet 6 or 8-detail I), and connection of ditch # 13 to ditch # 4 (see sheet 13-detail O);
- Carter Road (2) culverts – connecting ditch # 12 to ditch # 13 (see sheet 15 – detail R) and connecting ditch # 11 to ditch # 13 (see sheet 16 – detail T).
- Install subsurface culvert pipe along southside of La. Hwy 27/Marshall Street. Proposed is to install in an existing open ditch one 15" diameter by 215' long pipe with two CB 7 drop inlets (F.L. -1.90' NAVD 88) for install on opposite ends of an existing buried pipe culvert. (see permit detail sheet 17)

- The proposed would be accomplished by 100% land-based construction. Staging equipment, materials and supplies for construction work is proposed on nearby existing hardened surfaces. Materials and supplies will be stored at the contractor's facilities and brought on site when needed by the contractor. Otherwise, all staging will be conducted on nearby existing concrete slabs during the periods of work being implemented.

See sheets 003 and 013 of the permit (Exhibit H) for the preliminary operation plans for pump stations A and C, respectively. The weir at Structure B to stop influences for rate of inflow from Basins 3 and 4 into Basin 5. In addition to the operation of Pump Stations A and C, Basin 5 is gravity drained through new flap-gated culvert at Control Structure C. Discharge of the system is into the CLP.

The cumulative footprint of the project is 13 acres. Licensed landfills will be used for disposal of soil waste material and construction debris with approximately 5,390 cys excavated soil and permitted soil pits will supply approximately 404 cys of earthen backfill.

Statement of Purpose and Need for the Proposal: The purpose of this project is to reduce risk to public safety and improved properties by reducing stormwater flooding. Under the future-without-action stormwater flooding continues with potential for worsening from rainfall that is ponding over roadways and backflowing into housing for Low to Moderate Income (LMI) residential population and commercial properties within the Pump Stations A and C areas of influence.

Pump Station A is designed to support duplicity/redundancy if other control systems become inoperable or unable to relieve strained drainage. Pump Station A would relieve a strained drainage system via the ditch # 13 connection to ditch # 4 leading to Pump Station A during heavy rainfalls until other pumps, specifically Pump Station C, become operable or stormwater runoff is reduced within the drainage system. Control Structure B is designed to control drainage flows into drainage system and allow water retention within the existing floodplain area associated by alleviating overburdened ditch systems. Grading/dredging of existing ditches and up-sizing existing culvert work is needed to support adequate gravity feed drainage flow within improved drainage system and aids in discharge of stormwater at respective pump stations. Installation of new buried culverts is to reduce debris build-up within exiting open ditches along high-traffic roadways, appropriately directing drainage to respective pump stations, and improve

drainage management to avoid backflows in system.

Existing Conditions and Trends [24 CFR 58.40(a)]: Cameron, Louisiana, is a census designated place and coastal community within Cameron Parish, Louisiana. There are no incorporated municipalities within Cameron Parish, Louisiana. The community of Cameron serves as the Parish seat of government and the Parish is participating in the National Flood Insurance Program (NFIP). The community of Cameron is identified as high-risk flood area on FEMA Flood Maps (Flood-zone AE). According to the most recent published Cameron Parish Hazard Mitigation Plan (2020), the annual overall flood risk factor was identified as high-risk at a rate of 3.4 of 4.0 with a likelihood of a flood event resulting in major damage-impacts making flood mitigation a priority to the community. Existing conditions and trends in the project vicinity are like those documented in a Federal Emergency Management Agency (FEMA) Final Programmatic Environmental Assessment (PEA) for Jefferson Davis Electrical Cooperative (JDEC) Project (2022).

Rainfall Rates

According to Weather Park, average annual precipitation is 50 to 70 inches a year (average of 60 to 65 inches was adopted and modified by PRISM Climate Group - www.prism.oregonstate.edu). Wetter seasons are from June to September with a greater than 37% chance of rain occurring on a given day; and, July having an average of 14.7 days of rain. However, June was determined to have the most rainfall with approximately 5.6 inches being reported on June 25, 2024. https://weatherspark.com/y/10139/Average-Weather-in-Cameron-Louisiana-United-States-Year-Round

Drainage Basins

Drainage for the project area is comprised of five (5) drainage basins as fully described and depicted in Lonnie G. Harper and Associates, Inc. 2022 and appendices. Pump Station A's area of influence is within Basin 1. Drainage Basin 1 is the northwestern most basin and is approximately seven (7) acres including areas north and south of Highway 27. Pump Station A's area of influence includes portions of Basin 2. Drainage Basin 2 is approximately twenty-two (22) acres to the east of Basin 1, also including areas on both sides of Highway 27 and stops west of MacArthur Street. Pump Station C and Control Structure B areas of influence include Basin 3. Drainage Basin 3 is approximately 215 acres located both south and north of Highway 27 extending from midway between McCall Street on the west to Dewey Street on the east and south to a controlling elevation boundary. All improved drainage areas of influence are within Basin 4. Basin 4 is approximately 1,046 acres. Water, and therefore water levels in Basins 3 and 4 interact due to the +1.2' NAVD88 boundary elevation between the two basins. Drainage Basin 4 is south of Basins 1 and 2 and west of Basins 3 and 4. Pump Station C area of influence is within Basin 5. Basin 5 starts adjacent to or south of Highway 27 on the north to or near to CLP on the south. It extends from the mid-point between Carter and McCall Streets on the east to a point approximately 420 feet west of Rex Road. Basin 5 consists of approximately 22 acres. Basin 5 receives water from Basins 2, 3, and 4. Water within Basin 5 is accumulated along road ditches and discharges at Rex Road and near Davis Road into CLP.

Geology, Topography, and Soils

The primary geologic unit in the project vicinity is Chenier Plan, coastal marshes (Holocene) and Pleistocene coastal ridges (FEMA/PEA, 2022). The ridges generally run parallel or are oblique to the coast. The community of Cameron is located on a ridge. Ridges and developed areas define the drainage basins for the Cameron's stormwater drainage system.

Land subsidence (sinking) is a key driver in coastal change in Louisiana. Total (deep and shallow) subsidence for the project area under the higher scenario ranges from 1.2 to 2.0 mm/year for the Calcasieu Ecoregion and greater than 6.1 mm/yr for the Chenier Ecoregion (Fitzpatrick et al. 2021). General processes contributing to subsidence in coastal Louisiana include tectonic subsidence, Holocene sediment compaction, sediment loading, Glacial Isostatic Adjustment, Fluid Withdrawal, and Surface Water Drainage/Management (Fitzpatrick et al. 2021). Managing drainage influences subsidence rates by altering soil moisture or dewaters formally inundated soil, which reduces soil volume from consolidation and oxidation of organics. Reduction of soil volume results increases subsidence. Study shows that drainage management impacts tend to be on a geographical spatial scale of discrete, local, and regional impacts to the landscape with evidence of impact appearing on landscape within one to 20 years. (CPRA 2021). Subsidence factors demonstrate the need to consider consequential actions, cumulative or not, to the human and natural environment and how these impacts have the potential to effect areas beyond the limits of influence from the project.

The topography of the landscape is essentially flat, with a maximum elevation range across the landscape of 10 feet and average elevation three (3) feet above mean sea level. The landscape is Gulf Coast Prairie within conservation cooperatives supported by the United States Fish and Wildlife Service (USFWS). The geological landscape has human-made and natural water-way channel cuts through-out the parish. The community of Cameron is bordered by the Gulf of America to the south, Calcasieu River Ship Channel to the west and wetlands, marshlands with open lake (Calcasieu Lake) bordering the north. These waterways accept draining waters from adjacent agriculture, industrial, and residential areas, including Lake Charles, Calcasieu Parish, Louisiana.

The ground water table in the project vicinity is shallow with depths ranging as low as zero (0) to forty-two (42) inches below the topographic surface. Moderate rainfall over the project area results in limitations for stormwaters to percolate the ground during heavy rainfalls. The present gravity drainage system for the community of Cameron is susceptible to backwater flooding due to high-tide flooding and storm surge-based flood risks on the outside of the drainage system. High-tide flooding is forecasted to increase from less than 5% to over 50% over the next 50 years (CPRA, 2023).

Soils in the geographic area limit stormwater ground percolation. Soil types identified within the project areas are as follows: Udifluvent 1 to 20 percent slopes within the commercial area of Cameron and to the west side of Davis Road; east of Davis Road the soils are identified as clays specified as being Mermentau clay, Creole mucky clay, and Hackberry-Mermentau complex; and north of the project area, being north of Louisiana Highway 27, soil is identified as Hackberry loamy fine sand. All soil types are classified as somewhat poorly, poorly, to very poorly drained soil types with variances associated with the soil properties found as clay, clayey loam, and sandy loam contents. None of these soils are classified to support *Prime Farmland* and have varied amounts of saline contents. [https://websoilsurvey.nrcs.usda.gov/app/ accessed online June 23, 2025]

This flat geographical landscape's gravity-fed stormwater drainage system is partially hindered from drainage-water escaping systems due to shallow water tables, poorly drained soil types, overburdened channels intended to accept drainage waters and water levels outside the system. Within the existing drainage system, limited capacity results in ditches quickly overflowing and causing stormwater ponding over roads as well as backflowing into private improved properties. The proposed pumping controls would force discharge of stormwater runoff from the gravity-fed drainage system into the river channel to relieve drainage of excessive rainfall waters from the community.

Clean Water Act

Sections 303 (d), 401, and 402 of the Clean Water Act and the Safe Drinking Water Act provide for the regulatory water quality standards as it relates to surface water pollution and the quality of public drinking water. Existing conditions and trends for water quality resources in the project vicinity are similar to those documented in a Federal Emergency Management Agency (FEMA) Final Programmatic Environmental Assessment (PEA) (2022).

The *United States Environmental Protection Agency* (EPA) identifies which bodies of water within the HUC12 Watershed under the Clean Water Act, Section 303(d) are degraded and not attaining minimum water quality standards. Based on EPA and the *United States Geological Survey* (USGS) waterway monitoring systems, coliform contaminants and degraded water quality is identified for the project vicinity within the *Region 4* and *Region 5* of the Louisiana Watershed Initiative Programs.

Cameron Parish is only able to control pollutant point and nonpoint discharges within their jurisdictional boundaries and authorities. Mitigation controls are identified and stipulated under the *Louisiana Department of Environmental Quality* (LDEQ) *Louisiana Pollutant Discharge Elimination Standards* (LPDES) permit requirements.

There is an existing LDEQ permitted wastewater treatment plant located at 373 David Road, Cameron, Cameron Parish, Louisiana operated under the purview of the Cameron Parish Wastewater District #1. The facility consists of three (3) open sewer treatment ponds, with sludge collection, removal, and disposal and water treated with chlorine gas as the final disinfectant is discharged into CLP. This facility is adjacent to Stormwater Drainage Basin 4 and is in good standing with LDEQ regulatory compliance.

The community of Cameron falls within the U.S. Environmental Protection Agency's (EPA) Region 6. EPA identifies the waterbodies in *Region 6* watershed not able to meet minimum clean water standards with evidence of Hexachlorobenzene, Hexachlorobutadiene, and PCBs causing health advisories for consumption of fish from these waters since 1993. Within a range of approximately 17 square miles around the community of Cameron, there are around 37 facilities that discharge into vicinity waters within project area with more discharge points being added.

From the mouth of the Calcasieu River to 5000 feet out into open Gulf waters, and from the mouth of the Calcasieu Ship Channel there are approximately 3 miles to the east and five miles to the west of the Calcasieu River's mouth a water-zone area that is prohibited from growing or harvesting shellfish (NOAA, ERMA). Additionally, EPA reports polluted natural waterways

hosting pathogens, inclusive of coliforms and harmful algal plumes harmful to both human and marine life are well below minimum allowed national water quality safe standards, resulting in public advisory alerts.

EPA and USGS have water quality monitoring stations through-out Cameron Parish. EPA sets standards and provides oversight for Louisiana's Surface Water Monitoring and Assessment Program by reviewing and/or approving annual Integrated Reports (IR). Louisiana Department of Environmental Quality (LDEQ) Water Quality Program collects data from various areas to account for total maximum daily load (TMDL) to regulate, identify causes, issue public warnings, and remediate concerns. EPA approved the LDEQ 2024 IR and the 2025 IR is pending approval.

LDEQ regulates *Nonpoint Source* and *Point Source* pollutant discharges. *Nonpoint Source* (NPS) is related to water pollution that is generated from a discrete conveyance, such as a discharge pipe, but is generated during rainfall events. It is considered the largest remaining type of water pollution that needs to be addressed within Louisiana and across the nation to restore the water qualities and hydromodification activities, including pumped drainage discharge pipes as being a contributor. To manage this concern, LDEQ is operating under a five (5) year NPS Management Plan approved by EPA from 2023 to 2027. https://deq.louisiana.gov/page/nonpoint-source

To further support LDEQ efforts for bringing Louisiana waters to national water quality standards, under the LPDES, LDEQ reviews permit projects and conducts oversite of permitted programs. The LDEQ program implements and reviews the Municipal Separate Storm Sewer System (MS4) program. This is the infrastructure used to convey and control stormwater runoff and includes permitted discharge of runoff managed by municipal staff-members trained by LDEQ for controlling non-point pollutant discharge into public drainage. MS4s must be owned or operated by the U.S., State, town, parish, or other public bodies of government. Typical MS4s stormwater management duties fall to the public works department or similar local governmental agencies that have adopted local ordinances for enforcing stormwater management requirements. As of 2019, Cameron Parish was not participating in this program. For permitted MS4s, a Small MS4 Storm Water Management Plan (SWMP) is needed for adoption by the local jurisdictional government that identifies controls with permit application made through MS4 to LDEQ for supporting the State's efforts to manage and control NPS in Louisiana waters. https://deq.louisiana.gov/page/storm-water-protection

LDEQ (Water Quality) has full responsibility for regulating and monitoring hydromodification processes and the dynamics associated with turbidity and pollutant discharge concerns from Cameron's stormwater drainage discharge elements. United States Army Corp of Engineers (USACE) Programmatic General Permit (PGP) was issued with stipulations for the entire scope of work under permit number MVN-2020-00671-WILL, inclusive of compliance with local, State, and Federal laws. Louisiana Department of Natural Resources and Energy (LDNR), Office of Coastal Management (OCM), issued a Coastal Use Permit (CUP) with stipulations requiring compliance with State Laws under permit number P200220077. State laws requires compliance with LDEQ's LPDES permit at minimum. LPDES permit would result in LDEQ monitoring and regulating discharge *total maximum daily loads* (TMDLs) while reporting compliance concerns under EPA's annual IR reporting required. LDEQ, in collaboration with EPA, will determine when concerns arise and remediate accordingly through regulatory

processes.

Existing EPA and USGS water quality monitoring system are situation within the vicinity of the community and support a baseline data for post stormwater discharges associated with this project. LDEQ findings for this matter concluded that the USACE PGP issued a water quality certification for construction of drainage infrastructure. LDEQ regulatory water quality monitoring program will determine from future collected data a need or not for further remediation of NP discharge concerns associated with drainage discharges. At this time, discharge poses no immediate concern, and proposed project has no objection from LDEQ.

Sole Source Aquifer

Cameron Parish Sole Source Drinking Water comes from the Chicot aquifer system and water utility service is provided by Cameron Parish Waterworks District 1. The Chicot aquifer system has a base fresh groundwater ranging around 300 feet below the National Geodetic Vertical Datum of 1929 (NGVD 29) in the southeastern part of the parish to about 800 feet below NGVD 29 in the north-central part and containing an underlain salt-water zone between 200 to 500 feet. There is no fresh groundwater present in the southwestern part of the parish or along the southeastern coastline. Salt-water underlain at 700 feet exist throughout the parish. Chicot aquifer waters generally favor basic Ph levels of hard waters with some waters containing above minimum levels standard for Iron, Manganese and other solids. Chicot aquifer system rainfall recharge zone is located north of Cameron Parish (Prakken 2014 USGS-FS) where the aquifer system crops out in the northern Allen, Beauregard, and Evangeline Parishes and in southern Rapides and Vernon Parishes (Lovelace 2014). Proposed construction work and discharge under this EA is not expected to have an impact to the *Sole Source Drinking Water* resources.

Surface waters withdrawn in Cameron Parish is from the Calcasieu and Mermentau Rivers, Bayou Lacassine, and the Gulf Intracoastal Waterway and used for industrial use, livestock, rice irrigation, and aquaculture. According to EPA water quality data collections, surface waters in rivers and lakes of the Calcasieu River basin are generally brackish with chloride water greater than 250 mg/L (EPA NEPAssist.gov). This project proposes stormwater discharge into the CLP, part of the southern river basin region near the Gulf and within proximity of one of EPA's water quality monitoring system stations. Pollutant discharge controls are mitigated through LDEQ LPDES permit stipulations and LDEQ regulated permit compliance for potential non-point discharges from drainage discharge systems. (Lovelace 2014. & Prakken, L.B. 2014)

Flooding and Coastal Erosion

The entire Parish is within a Coastal Zone Management Area (CZMA) due to high density of wetlands and floodplain as well as concerns associated with coastal erosions. Additional State concerns are related to high incidents of flooding State-wide.

In October 2021, *Louisiana State-wide Watershed Initiative Program* (LWIP) introduced program goals for sustainability and resilience to include *Nature Based Solutions* in project designs. The LWIP projects are funded through HUD CDBG-Mitigation funds and are managed by Louisiana Office of Community Development under the Louisiana Resilient Community Initiative Program (RCIP). [https://watershed.la.gov/action-plan accessed online Jun 4, 2025.] Using a multi-disciplinary research approach on State-wide water quality and drainage

improvement, LWIP determined that some past drainage solutions did not result in positive long-term benefits. Some projects resulted in causing upstream/downstream impacts across the State's landscapes and deteriorated natural ecosystems leading to continued deterioration of water quality and drainage throughout the State.

Cameron Parish falls within two regions of LWIP. Region 4 covers the west side of the parish to include drainage of the Sabine and Calcasieu River basins, inclusive of their associated tributaries. Region 5 continues east beyond the parish line to include drainage from the Mermentau River basin in Cameron Parish. The community of Cameron falls within the Region 5 mapped footprint. However, the Calcasieu River basin would serve as the discharge point for controlled drainage and is the natural drainage region for the community and thereby considered under this EA. The Mermentau River basin is presented to consider the cumulative effects on coastal waters along the 13 mile stretch of coastline between the Mermentau and Calcasieu Rivers. Recent channel cuts near the mouth of the Mermentau River were conducted to alleviate some stormwater flood overburden. This river channel's mouth is approximately 13 miles to the east of Pump Station C drainage basin area of influence.

In 2020, CPRA, in coordination with Cameron Parish, dug a cut from the Mermentau River to the Gulf shoreline to drain water after Hurricane Laura made land fall. The channel cut was then dredged, due to Hurricane Delta, causing sand and sediment to fill in the channel. CPRA implemented strategic placement of pumps to accelerate drainage in hard-hit communities of southern Cameron Parish. [CPRA. *Challenges Met. Progress Delivered. 2016-2023.* Page 17. 2023.] Data was not located that documented altered marine habitat and water quality from these activities.

The CPRA Mermentau River cut with pumps project did not alleviate the need for Cameron's forced controlled drainage system. The backflow of waters from overburdened channels compounded with marsh wetlands loss and poorly drained soils on flat landscapes contribute to these flood risks. Remediation of drainage is a need for community public welfare. LWIP and CPRA recognize subsidence as a key factor for both flood-risk and coastal erosion land loss. Cameron Parish has significant coastal erosion concerns near equal to the southeastern portion of Louisiana. However, CPRA'S 2023 Coastal Master Plan for Determining Subsidence Rates for Use in Predictive Modeling indicates that southeast Louisiana land subsidence is higher (~14.8 mm/yr in Terrebonne Parish) than southwest Louisiana (~1.5 mm/yr – Cameron Parish). Subsidence is recognized as having a direct impact on landscape changes and contributes to relative sea level rise rates leading to further coastal land loss.

Coastal restoration and beneficial use projects in the proximity north of the community were considered for the cumulative effects under this EA. These include those authorized by the Coastal Wetlands, Planning, Protection and Restoration Act, Restore Act Direct Component, and permittee responsible beneficial use. Marsh wetlands and floodplains have the capacity to temporally retain flood waters during high stormwater runoff events and can support filtration of pollutants. Wetlands provide water quality maintenance and storm protection functions. Wetlands can absorb and filter water thereby helping reduce the severity of downstream flooding and erosion. [CPRA. *Calcasieu-Sabine Large Scale Marsh and Hydrologic Restoration (CS-0087)*. February 2023]. These habitat restoration projects provide synergy.

There are recently constructed and reasonably foreseeable new construction of Liquid Natural

Gas (LNG) refineries nearby the community of Cameron. The Venture Global, Liquid Natural Gas (LNG) is located south of the community. An additional refinery, Venture Global's CP2 LNG is authorized for construction, west of community, on Monkey Island. Expansion of Monkey Island and addition of non-permeable surfaces is planned. Under future condition trends, the CP2 LNG was determined it can affect natural drainage and increase flooding in the surrounding area and therefore mitigation was included. Including beneficial use of dredged material by the LNGs and marsh restoration projects by others near these industrial developments it is anticipated to mitigate adverse effects on water quality related to non-permeable surface run-off and alleviate resulting flooding concerns associated. The refinery is mitigating these concerns through on-site stormwater retention controls.

Floodplain Management and Protection of Wetlands

Pursuant to Executive Orders 11988 and 13690, proposed action is compatible with Title 24 CFR § 55.1 by virtue of no floodplain or wetland is being altered and no new construction for standing structures are being proposed within said protected resources.

This project work does not propose to alter existing floodplain within the drainage area of influence. Open space classified as floodplain is located east of Control Structure B. Proposed Control Structure B was determined to have no influence for changes to existing floodplain and no additional construction is proposed within this area. The existing floodplain is being utilized for the intended beneficial use and purpose of floodplain which is to retain rainwater during heavy storm events to allow drainage to naturally flow into floodplain with release of waters traveling into existing drainage channel. Pump Station C with Control Structure B are designed to relieve excessive water from within existing drainage channel that currently crosses through floodplain prior to drainage channel backflowing into LMI residential areas as experience under current conditions.

There are no wetlands identified within the proposed footprints of project areas. No upstream/downstream impacts were determined through the CUP hydrostatic and hydrology study to result in a direct or indirect effect to wetlands. All other locations within the work areas are classified as medium intensity for development of commercial and residential zones. No mitigation banking for wetlands from proposed work was required for this project. [See Exhibits F and G for regulatory permits – LDENR(C&E), OCM (Div of Permitting & Compliance), CUP and USACE PGP]

An early public notice was released for a 30-day public comment period on July 1, 2025. Advertisement was provided through the CPPJ News Website and posted at Parish Courthouse for public review (See Exhibit P attached). No public comments were received from these postings of public notices. Additionally, no practicable alternative provided support for no adverse impacts to floodplains or wetlands from the proposed project work and intentions of proposed work to relieve community flooding concerns. (See Exhibit P for FFRMS evaluation, FIRMETTE Maps, and EPN)

Noise Abatement and Controls

Pursuant to the Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B, pumps are designed for quiet operations. Pumps are submersible in water to deaden

noise and prefabricated metal wall screening surrounds pump operations for furthering abatement of operation noise. Additionally, pumps are strategically positioned near commercial industrial locations away from residential areas and designed to operate during heavy rainfall events only. The pumps will not be in operations continuously and when in operations, other machinery within the area will buffer any noise from pumps due to pumps quiet operations and buffers for noise abatement and controls.

Prime Farmland

U.S. Department of Agriculture (USDA) manages concerns defined under the Farmland Protection Policy Act. Actions proposed for land conversion requires consultation with USDA to determine if proposed action has the potential to irreversibly alter endangered prime farmlands. This proposed project does not convert any land usage, and no consultation was required.

Contamination and Toxic Substances

Louisiana Department of Environmental Quality (LDEQ) regulates contaminant and toxic substances through an approved U.S. Environmental Protection Agency (USEPA) program in accordance with Louisiana Administrative Codes, Chapter 33. A solicitation of views (SOV) was requested from LDEQ for this proposed project. LDEQ reviewed the proposed project and determined that several abandoned underground storage tanks (USTs) either once existed or was still in existence near the project area. (See LDEQ SOV response at Exhibit I).

LDEQ determined that four of the five documented USTs were removed from agency interests with one UST remaining at the former storefront property known as Darla K Food Mart, Inc, at 453 Marshall Street, Cameron, Louisiana, along Louisiana Highway 27. LDEQ identifies this location as Agency Interest (AI) number 76842 in the LDEQ tracking database. This area with pending concerns was identified within the Louisiana Department of Transportation (DOTD) right of way. A scope of work is pending approval by DOTD.

LDEQ had no objection to the proposed and stipulated work within areas of previous and existing AI areas would require excavated soils be removed as waste for disposal at appropriate licensed landfill in accordance with LDEQ Risk Evaluation/Corrective Action Program (RECAP) defined at LAC 33:VII. Additionally, if any underground storage tanks are encountered during work, compliance with LAC 33:XI of the Environmental Regulatory Code is required with report of findings submitted to LDEQ. A determination of no significant impact for this is conditional on compliance with LDEQ stipulations under SOVs at Exhibit I.

Biological Resources

Based on the Coastwide Reference Monitoring System (CRMS) mapping viewer, habitat in the project vicinity consists of water; intermediate, brackish, and saline mash; and other. The majority of the habitat within the pump station drainage basins is classified in the CRMS data as other. The areas designated as other consist of developed areas with various surfaces and undeveloped areas consisting of grasslands. The largest grasslands area includes Drainage Basins 3 and 4 in the Hydrology and Hydraulics Report being predominately within Pump Station C and Control Structure B's areas of influence. Various flora and fauna exist with increasing diversity and ecological function from the drainage basin grasslands to the adjacent marsh and water of CLP. Refer to the 2022 PEA for the flora and fauna species generally located

in the vicinity.

The proposed project work is not anticipated to have a direct adverse impact to Endangered or Threatened Species. IPaC identified four species of concern are within the project area under the jurisdiction of the USFWS as follows: Monarch Butterfly (*Danaus Plexippus*), proposed as Threatened, Tricolored Bat (*Perimyotis subflavus*), proposed as Endangered, West Indian Manatee (*Trichechus manatus*), listed as Threatened, Whooping Crane (*Grus americana*) is an Experimental Population, Non-Essential. IPaC determined that there are no critical habitats within the delineated project area. Therefore, no effect to these species is anticipated. However, a Lafayette Regional Office Ecologist review determined a biological assessment was needed within the construction work areas to identify potential nesting areas for listed species. On August 13, 2025, CSRS conducted a site visit at the proposed construction zone areas to assessment potential biological concerns. None of the protected listed species were observed.

The National Marine Fisheries Service (NMFS), Endangered Species Act Section 7 Mapper identifies Green sea turtle, Loggerhead sea turtle, and Kemp's Ridley sea turtles may be found in the CLP, in the vicinity of the existing stormwater discharge. However, no critical habitat for these species has been designated in the area. Based on the no significant impact from the change in stormwater discharge, it was determined that the proposed action would not affect any ESA-listed species or designated habitat under the NMFS' purview.

The stormwater drainage areas are non-tidal and therefore are not designated as Essential Fish Habitat (EFH). However, CLP in the vicinity of the stormwater discharge may be designated for brown shrimp, white shrimp, red drum, Spanish mackerel, grey snapper, bonnethead shark, spinner shark, blacktip shark, and bull shark based on the EFH Mapper and EFH Inland Mapper. The drainage basins under the future-with and future-without action are under stormwater drainage. The proposed action would be accomplished by 100% non-tidal, land-based construction. There are no impacts to tidal wetlands. The change in stormwater discharge into CLP in the future-with-action as compared to the future-without-action is negligible. Therefore, there would be no adverse impact to EFH or managed species.

Cultural Resources

Historic properties were considered for potential impacts. The National Historic Preservation Act (NHPA), Section 106 consultation process was initiated with State Historic Preservation Office (SHPO) and eleven (11) Tribal Governments (THPOs) listed as having interests in activities occurring within Cameron Parish. A determination of no adverse effect was provided for concurrence or non-concurrence within a 30-day consultation period. SHPO concurred that this project work was not subject to impact historic resources. The Choctaw Nation of Oklahoma, Tribal Historic Preservation Officer (THPO), was the only THPO to respond and responded with concurrence of no effect under stipulated standard conditions as follows:

> "In the advent that ground-disturbing work uncovers significant archaeological materials, such as stone arrowheads, ceramics, or early building foundations, or if work uncovers human burials or human remains, ground disturbing activities will immediately be stopped within a 300 foot radius and the materials protected. The State Historic Preservation Officer and the Choctaw Nation of Oklahoma Historic Preservation Department will be contacted as soon as possible and given an opportunity to provide

input before construction resumes.

If any archaeological or cultural materials are discovered during the project undertaking, neither the construction team or the applicant will disclose this information to the general public or the media in any manner. Discoveries of archaeological material will be kept private and confidential."

The requested stipulations, in their entirety, by the Choctaw Nation's THPO are standard stipulation in keeping with Section 110 of the NHPA, various U.S Federal Treaties with Sovereign Native American Tribal Governments, other signed agreements between governments, Executive Orders, Archaeological Resources Protection Act and the Louisiana Unmarked Human Burial Sites Preservation Act.

In pursuant to the *Unmarked Human Burial Sites Preservation Act*, consideration for potential crime scene is included. Therefore, a no adverse effect determination includes the stipulation that in the event that inadvertent discovery of human remains arises, work will stop, site will be secured, and local law enforcement with coroner will be contacted immediately to determine if discovery is a crime scene. If it is determined that the inadvertent discovery of human remains is older than 50 years and not associated with a crime scene, the State Attorney General and State Archaeologist will be contacted within 24 hours from that determination of no crime scene, allowing the State Archaeologist to investigate findings as an archaeological site. State Archaeologist will consult with respective interested Tribal authorities on matters of concern. No work will continue until authorized investigating authorities clear work to commence.

Pursuant to the *Archaeological Resource Protection Act* (ARPA), archaeological data is classified as sensitive information and not subject to the Freedom of Information Act. Therefore, any suspect archaeological evidence inadvertently discovered must be treated as sensitive information and not disclosed as general public information until investigations are completed and resources are protected for preservation and cultural privacy concerns. Stipulations for compliance with these conditions results in a no adverse effect to historic properties from proposed project work. Failure to comply with these stipulations is a violation of Federal and State laws and subject to jeopardize Federal funding.

<u>Existing Exclusions for Need to Conduct NEPA EA</u>

This drainage improvement project type of work does not set a precedence for receiving federal funding. HUD's implementing regulations for NEPA are defined under Title 24 Code of Federal Regulation (CFR) Part 58 and does not identify this type of work as categorically excluded from the need to conduct an environmental assessment (EA). The U.S. Department Homeland Security, FEMA Office of Environmental Planning and Historic Preservation determined that improved drainage projects consisting of no more than twenty-five (25) acres did not result in significant impacts to the protected resources and assigned a categorical exclusion from the need to conduct an EA, if no unresolved *Extraordinary Circumstances* existed. See Council of Environmental Quality (CEQ) listing of Federal agencies' categorical exclusions (CEs), FEMA "N9" - Federal Assistance for Flood Hazard Reduction Actions. Additionally, other Federal agencies have similar CEs for this type of work, including but not limited to U.S. Department of Federal Highways and Transportation, and U.S. Department of Agriculture – Forest Service, among others. However, these other CEs do not necessarily align with the DHS-FEMA defined

work as covered under this EA but other agencies CE's type of work are similar in that work is contained within existing drainage rights-of-way.

In accordance with Title 42 U.S.C 4336 (c), Federal agencies are able to adopt CEs used by other Federal agencies when other agencies determined the nature and defined scope of work is the type of work previously determined to have no significant impact to protected resources and when *Extraordinary Circumstances* of concern are resolved. HUD NEPA regulations (24 CFR §§ 58) did not adopt CEs for this type of work. Additionally, *Extraordinary Circumstances* exist and are related to protected sensitive resources that may be impacted despite the proposed action typically qualifying for CEs. The *Extraordinary Circumstances* considered include potential cumulative impacts to water quality based on changes in discharge, location within a high-risk flood zone surrounded by wetlands/floodplains, coastal erosion concerns, and impacts from outside projects being implemented within the vicinity of the proposed project.

Funding Information

Grant Number	HUD Program	Funding Amount
12LDRC7702	CDBG-DR	$5,730,565.16

Estimated Total HUD Funded Amount: $5,730,565.16
Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]**:** $5,730,565.16

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes☐ No☒	There is no military airport within 15,000 feet or civilian airport within 2,500 ft of the project area; therefore, no impact concern exists. See Exhibit Q.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16USC 3501]	Yes☐ No☒	Work area is not within CBRA. See attached USFWS CBRS Units LA-10 & LA-09 map at Exhibit R.

Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes☒ No☐	Community participates in NFIP and most recent flood risk management plan was approved in 2020 with 2025 in draft. Pump stations facilities will be required to obtain and maintain insurance.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes☐ No☒	Community is within CAA attainable zone. See LDEQ SOVs letter dated June 6, 2025.
Coastal Zone Management Coastal Zone Management Act sections 307(c) & (d)	Yes☒ No☐	Community is within CZMA and obtain CUP P20220077 with a time extension granted for 5 years from 12/4/2024 for the defined SOW with a final determination finding no significant impacts. Operation management plan is required. LDEQ LPDES discharge permit may be required for pump stations in the future.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes☒ No☐	There are four areas of LDEQ concern consisting of abandoned active under-ground chemical tanks. Locations are within DOTD Hwy controls and any work at these locations must be approved by DOTD & LDEQ to avoid tanks. No other toxic substance sites are known. See LDEQ SOV response.
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes☐ No☒	Consult on ESA - All work is proposed in existing drainage right-of-way with no significant impacts to endangered or threaten species. Standard Manatee Conditions are stipulated with no work proposed within waterways.
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes☐ No☒	No known outside of LNG refinery. LNG refinery is buffered and contained from community. LNG refinery is approximately 5,000 feet from residents & community commercial area with a wall around facility. Facility is a common liquid industrial fuel refinery. This project does not increase residential densities or conversion and therefore of no concern pursuant to 24 CFR 51 Subpart C.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes☐ No☒	Exempt from FPPA requirements given there is no land conversion proposed, the work proposed is within developed community - urban development with focus on stormwater drainage.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes☒ No☐	Functionally dependent with no practicable alternative and having no significant impacts on floodplain. Early Public Notice published July 1, 2025, for 15-day comments. See exhibit P.

Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes☒ No☐	Consult with SHPO/THPO (see persons consulted above) – all work is within existing drainage right-of-way with minimum new ground-disturbance. SHPO/THPO concurred no impact findings with stipulations. See standard mitigation measures defined below.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes☐ No☒	Proposed pump stations are located away from residential properties - within commercial zones - are submerged in water basin to buffer noise and will be screened with prefabricated metal cover & walls to minimize noise impacts when in operation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424€; 40 CFR Part 149	Yes☐ No☒	Proposed work does not impact the Chico aquifer. Aquifer recharge zone is outside of area of potential impact outside of recharge zone. (Lovelace 2014 & Prakken 2014) Proposed work is within an existing non-attainable Clean Water Act standard zone.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes☒ No☐	Section 10 of the Rivers & Harbors Act, and Section 404 & 408 of the Clean Water Act - USACE Category II Programmatic General Permit (MVN-2020-00671-WILL) 5 years permit dated June 13, 2023, determined no impacts to jurisdictional wetlands. Permit stipulated mitigation measures.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes☐ No☒	According to the Department of Energy and Natural Resources Office of Coastal Management Coastal Use Permit/Consistency Determination, "No state or federal parks, wildlife refuges, wildlife management areas or scenic rivers are known at the specified site or within 1/4 mile of the proposed project.

Environmental Assessment Factors [24 CFR 58.40] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed, and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

(1) Minor beneficial impact
(2) No impact anticipated
(3) Minor Adverse Impact – May require mitigation
(4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	Work within existing drainage rights of ways.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	3	Turbidity mitigation required – controlled TSS from outflow pipes through regulatory permit compliance stipulations & TMDL counts. Erosion controls at outflow pipes will consist of rip rap install at outflow discharge points and allowing natural vegetative growth within rip rap.
Hazards and Nuisances including Site Safety and Noise	2	Equipment is proposed within secured areas and outside of residential areas.

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	2	No impacts - Short-term temporary contract work and existing Drainage District employees will continue management and maintenance.
Demographic Character Changes, Displacement	2	No impacts - No residential displacement or obstruction to accessing properties are anticipated from this work.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	There are no schools located within proximity of this work (20,000 feet). There are no cultural facilities in Cameron, La.
Commercial Facilities	2	Temporary construction will not impact operations or access to commercial facilities.
Health Care and Social Services	2	Temporary construction will not impact operations or ability to access health care facilities or social services.
Solid Waste Disposal / Recycling	2	Temporary construction will not obstruct solid waste management activities nor contribute significantly to solid waste disposal.

Waste Water / Sanitary Sewers	1	Drainage controls working in unison with marsh is anticipated to improve stormwater runoff removal from ponding on roadways & backflowing into improved properties. Marsh/wetland restoration projects are anticipated to improve water qualities.
Water Supply	3	Area of work & stormwater discharge is within a non-attainable Clean Water Act standard zone. Controlled pollutant discharge for TMDL mitigation is required under LDEQ permits.
Public Safety - Police, Fire and Emergency Medical	2	Temporary construction will not obstruct access for first responders.
Parks, Open Space and Recreation	2	There are no playgrounds, parks, or recreation facility within the immediate area to result in impacts.
Transportation and Accessibility	2	Temporary one lane closure on side roads may be implemented for workers safety but will not eliminate access through roadways. Continued access will be allowed.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	3	Turbidity and pollutant discharge mitigation measures are required. Regulatory permits stipulate compliance and stipulated actions are included in design. Pump Station Operation Management Plan for management & maintenance controls is required.
Vegetation, Wildlife	3	Turbidity and pollutant discharge could alter marine habitat and water quality without compliance with regulatory requirements. Operation Management Plan for controls is required.
Other Factors	2	

Environmental Assessment Factor	Impact Code	Impact Evaluation
ENERGY		
Energy Efficiency	2	New pumps are proposed to run during heavy rainfall events only. Pumps are designed to be more energy efficient than existing pumps but are anticipated to have insignificant impacts to energy resources.

Additional Studies Performed: Hydrology & Hydraulics study was conducted for LDNR-

OCM CUP and was reviewed to included information and demonstrate no significant impact to upstream or downstream waters will result from proposed work (See Exhibit J). Various design storms were evaluated to bracket the range of potential outcomes. As a standard, the design storm duration of 60 minutes with a 50-year return frequency was recommended. The future with discharge minus future without action discharge yields the net discharge forecasted with implementing the proposed drainage improvements. Both Basins 1 and 2 discharge into Basin 5 prior to discharging into CLP. For Basin 1, a 2.1 cubic feet/second increase in discharge into Basin 5 was estimated to occur from the future without to the future with action condition. For Basin 2, an 8.9 cubic feet/second decrease in discharge into Basin 5 was estimated. Therefore, the change in stormwater discharge into CLP from Basin 5 in the future-with action as compared to the future-without-action is negligible. Cleaning out roadside ditches in Basin 5 adds storage capacity on the upstream side of Pump Stations A and C.

USACE General Permit "Category II" was issued, and an evaluation of proposed work found no significant impact with the entire defined scope of work. USACE determined that work proposed does not result in more than 2.00 acres of tidal waters and no more than 3.0 acres of non-tidal special aquatic sites or exceeds 50,000 linear feet of flowlines, has less than 100,000 cubic yards of dredging/excavation work as well as other limited minimal construction work resulting in proposed work that would not have a significant impact on protected resources.

Additionally, the permit stipulates that any hazardous or toxic clean-ups resulting from the work or operations shall be sponsored by the government agency with established legal or regulatory authority. Therefore, the USACE determined proposed work is eligible for and issued a Programmatic General Permit with stipulations for compliance with local, State and Federal laws to support the determination for no significant impacts to the human and natural environment.

A review of the LDNR, OCM, Coastal Use Permit (CUP) for proposed project work was conducted with similar findings to USACE PGP and stipulations that compliance with local, State, and Federal law is required for a no significant impact determination. CUP stipulates backfill materials be clean and free of contaminants, all excavated soils be removed for disposal at State approved facility, consideration for protecting rare, threatened or endangered species and/or their habitats are given through an onsite biological assessment, and all sanitary sewage or related domestic waste generated shall not be discharged into any streams or adjacent waters within the area of work. All work is subject to unannounced site inspections by regulatory agencies during the five (5) year period given for project construction.

Research and review of proposed projects within the proximity of the community was conducted. Several LNG refinery projects were found under NEPA EIS publications for the significance of impacts associated with large scale projects and public meeting concerns. The LNG refinery projects proposed were not determined to impact the Cameron's proposed Drainage Control Pump Station project. The LNG refinery projects were found to have a potential for contributing to adverse impacts for stormwater drainage concerns, but mitigation measures implemented and proposed for implementation eliminated pending concerns. LNG refinery projects have and propose to utilize nature-based mitigation measures and incorporated storm-water retention areas within the refinery's property boundaries remediate concerns.

The proposed Coastal Protection and Restoration Authority (CPRA) FY2026 Annual Plan projects (i.e., CS-78 No Name Bayou Marsh Creation and CS-87 Calcasieu-Sabine Large Scale

Marsh Creation) were also reviewed and found to work synergistically with the community's goals and missions to mitigate their stormwater drainage system concerns. The cumulative effects of projects under CPRA's Annual Plan were reviewed for consideration of cumulative effects in conjunction with the proposed drainage project to understand potential impacts to the natural and human environments. Measures are required in the regulatory permits for the proposed drainage project that would avoid and minimize turbidity and pollutant discharge from outflow pipes into waterways.

A review of EPA *NEPAssist* (https://www.epa.gov/nepa/nepassist) was conducted to evaluate Extraordinary Circumstances as defined under NEPA. Potential water quality impact concerns under the Cleans Water Act were investigated. EPA and USGS have several water quality monitoring stations through-out Cameron Parish. EPA water quality monitoring data is available at the mouth of the Calcasieu River to inform cumulative impacts from upriver projects within the area. Various Federal and State agencies are monitoring TDML of contaminants through-out Cameron Parish waters to aid identifying areas of concern, conduct meeting and hearing with proponent of concern for remediation and resolutions with regulatory agency oversights for implementing remediations.

An evaluation and consultation with project engineers were conducted to consider nature-base solutions. Planting wetland vegetation as a nature-based solution was considered to potentially assist with water quality or erosion concerns at the discharge outfall locations. Given the erosive forces of the discharge velocity, it is not feasible to utilize planting wetland vegetation along the outfall shorelines. Alternatively, rock rip rap is included to prevent erosion at the discharge locations into CLP due to feasibility. Natural vegetative growth within rip rap areas will be allowed to assist with these erosion controls.

Field Inspection (Date and completed by)**:** August 13, 2025 - CBRS Biological Assessment

List of Sources, Agencies and Persons Consulted:

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CPRA. 2023. Louisiana's Comprehensive Master Plan for a Sustainable Coast. CPRA of Louisiana. Baton Rouge, LA. 4th Edition. May 25, 2023.

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Harper, Lonnie G & Associates, Inc. 2022. Environmental Design Report: Hydrology and Hydraulics & Construction Drawings (Preliminary) Version 0.3. Harper, Leonard, PE. Proposed Forced Drainage System, Cameron, Louisiana. April 2022.

IPaC. 2025. USFWS Project Code: 2025-0105485. Cameron Parish Pump Station Drainage Project Analysis for Endangered and Threatened Species. US DOI Fish and Wildlife. Louisiana Ecological Services Field Office. June 4, 2025.

LSU Stephenson Disaster Management Institute. *2020 Cameron Parish Hazard Mitigation Plan.* Mitchell, Brant, CEM. Morgan, Lauren, MEPP. Rippetoe, Chris, CFM. Harris, Joseph B, PhD. Louisiana State University, Louisiana Emerging Technology Center, Baton Rouge, LA.

Louisiana Office of Community Development (OCD). *Disaster Mitigation Initiative U.S. Department of Housing and Urban Development*. Federal Register Docket No. FR-6109-N-02. August 30, 2019. [Federal Register Notice FR-6303-N-01 funding through the Disaster Relief Supplemental Appropriations Act, 2022. (Pub.L. 117-43).]

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Monkey Island LNG. Company Website Public Notice of Cameron Parish proposed LNG project-Company Overview, Minimal Environmental Impacts, & Minimal Dredging Required. [https://www.monkeyislandlng.com. accessed online March 28, 2025]

Prakken, L.B. 2014. 1:1,000,000 scale. *Water resources of Cameron Parish, Louisiana*. U.S. Geological Survey. Fact Sheet FS-2013-3076 [https://ngmdb.usgs.gov/mapview/?center=-93.132,29.763&zoom=11 accessed online Jun 4, 2025]

_____-*Water resources of Cameron Parish, Louisiana: U.S. Geological Survey Fact Sheet* 2013-3076, 6p., https://dx.doi.org/10.3133/fs20133076. ISSN 2327-6916 print. ISSN 2227-6931 accessed online Jun 4, 2025].

USACE Permits

_____Cameron Parish Police Jury, Louisiana, *Pump Station Drainage Improvement Project*. Permit #MVN-2020-00671-WILL. June 2023.

_____*LWIP Mermentau Basin Inundation Relief Project in Cameron and Vermilion Parishes*. Application Permit #MVN-2023-01112-WPP Public Notice. March 2024.

USDA, Department of Natural Resources and Conservation Service. Web Soil Survey: National Cooperative Soil Survey. [https://websoilsurvey.nrcs.usda.gov/app/ accessed online June 23, 2025]

USEPA NEPAssist. 2025. Resource Files: Maps and reference report/data [https://www.epa.gov/nepa/nepassist. Accessed online May 4, 2025]

_____Cameron Drainage NEPAssist Project Analysis

_____Cachments

_____Impaired Streams and Waterbodies

_____Water Monitoring Stations

Agencies/Persons Consulted:

- Louisiana State Historic Preservation Office, Section 106 reviewers;
- Alabama Coushatta Tribe of Texas, Bryant Celestine;
- Alabama-Quassarte Tribal Town, Brine Williams;
- Apache Tribe of Oklahoma, Matthew Tselee, Chairman;
- Chitimacha Tribe of Louisiana, Kimberly Walden;
- Choctaw Nation of Oklahoma, Ian Thompson;
- Coushatta Tribe of Louisiana, Kristain Poncho;
- Eastern Shawnee Tribe of Oklahoma, Lora Nuckolls;
- Jena Band of Choctaw Indians, John Flynn;
- Mississippi Band of Choctaw Indians, Cyrus Ben, Chief;
- Tunica-Biloxi Tribe of Louisiana, Earl Barbry, Jr.;
- Seminole Tribe of Florida, Tina Marie Osceola

List of Permits Obtained: CUP #P20220077 & USACE # MVN-2020-00671-WLL
LDEQ LDPES and water quality certification was issued under MVN-2020-00671-WILL.

Public Outreach [24 CFR 50.23 & 58.43]**:**

FFRMS Early Public Notice for notifying the public of proposed work within high-risk flood areas, floodplains, and wetlands. July 1, 2025.

Cameron Parish Communication & Outreach Strategy for: Hometown Revitalization Program and Resilience Communities Infrastructure Program. In line with Cameron Parish Citizen Participation Plan for CDBG-DR. October 2023.

Public Notice. DeQuincy News. HUD CDBG-DR funds and potential projects eligible for funding notice of meeting on October 11, 2023. September 28th & October 6, 2023.

Cameron Parish Police Jury website webpage on CDBG-DR programs and funding. October 11 to November 10, 2023. (30 day posting).

Cameron Parish Police Jury CDBG-DR Public Meeting. 2:30 pm, October 11, 2023. (19 resident

sign-in). All CPPJ member in attendance. Discuss potential projects and community priorities.

Cameron Parish Police Jury CDBG-DR Project Submission Update. November 8, 2023. Presentation on RCIP grant program, eligible project types, priority areas under RCIP, and estimate funding for project costs.

Cameron Parish Police Jury CDBG-DR Updates Meeting. November 4, 2024. Presentation of projects proposed for grant application process.

Cumulative Impact Analysis [24 CFR 58.32]**:**

Past, present, or reasonably foreseeable activities in the project vicinity were considered to inform potential cumulative impacts. The considered activities include sewer upgrades, rain gauges, coastal wetland restoration, drainage improvements, and LNG refineries.

Other Cameron Parish proposed projects within or near the town were considered and found to have no influence on potential cumulative impacts nor are these projects dependent upon each other. Those projects considered were as follows: 1) upgrading eleven (11) sewer-lift stations without changing size, function, or capacity; and, 2) installing rain gauge monitoring systems with early alert warning systems. These other two projects have minimum concerns under NEPA with the sewer-lift station project determined as categorically excluded from EA process due to no or minimum related concerns associated with proposed actions or relevant consequences of actions. The sewer-lift station project consists of work confined within current sewer concreted sump basin system and are within fenced maintenance service areas with no expanded footprints. No discharge from this work or changes to existing landscapes are proposed under the sewer-lift station project. The rain gauge monitoring systems project is throughout the parish and consists of installing monitoring equipment on poles or existing infrastructure along natural and man-made drainage systems with no or minimum disruptions to the landscape. No discharge or changes to landscape features are proposed under the rain gauge project. Based on other projects presenting no discharges and alteration to landscape features from these two projects were deemed to have no influence on potential impacts associated with proposed drainage controls because they are not connected systems to the drainage system and do not substantially or permanently alter the existing natural environment. Therefore, these other two projects do not influence, positive or negative, potential impacts associated with the drainage control system considered under this EA.

Cumulative impacts were considered juxtaposed with existing or reasonably foreseeable projects in the vicinity. These include: Louisiana's CPRA FY2026 proposed wetland restoration projects, recent previous channel cut and pump discharge into Mermentau River, and LNG refinery developments within Cameron Parish as well as the Louisiana State-wide Watershed Initiative project within the Mermentau River Basin area.

CPRA's wetland restoration projects were determined to be compatible with and supportive of the proposed Cameron drainage system. Although wetland restoration through hydraulically placed sediment to create marsh elevations results in localized temporary water turbidity, created wetland acres provide a buffer for storm surges and filter runoff. Design measures and permit conditions for the proposed drainage project will aid in minimizing potential water quality impacts and will not result in significant cumulative impacts to water quality.

Louisiana State-wide Watershed Initiative Program (LWIP) proposes for construction of a drainage improvement project within the Mermentau River Basin, titled the Mermentau Basin Inundation Relief Project. Ground-breaking for this project was in October 2024. This project is identified to remediate flooding concerns east and northeast of Cameron's pump station project area, covers multiple State's governmental subordinates' jurisdictional territories, and has the potential to increase the flow of stormwater drainage into and through the Mermentau River Basin, inclusive of the southeastern portion of Cameron Parish near Grand Chenier, Louisiana and southwest corner of Vermilion Parish. Location of work is southwest of White Lake near Rockefeller Wildlife Refuge, in Cameron Parish and south of White Lake in the southwest corner of Vermilion Parish, near Pecan Island.

The LWIP project work consists of dredging/excavation of five drainage cannels, cleaning (24) existing drainage structures, and construction of an earthen terrace. Drainage structure work consists of cleaning/clearing inundated debris/sediment from existing channels and within twenty-four (24) lateral culvert pipes that run under La. State Highway 82. Earthen terrace construction is constructed with in situ borrow within Rockefeller Refuge, near Joseph's Harbor and the East End Locks. The project goal is to enhance water flow from north side of La Highway 82, through Rockefeller Refuge, to the Gulf of America and create 0.39 acres of marsh wetland from the earthen terrace construction. These actions will improve stormwater drainage within the area of influence of the Mermentau River Basin. Improving drainage in the Mermentau River Basin is compatible and complimentary with the Cameron Parish Pump Station project given it is site adjacent. No significant impact is triggered by the combined actions of these projects. (USACE Permit # MVN-2023-0112-2-WPP, Fenstermaker permit designs)

Cumulative impacts are reasonably foreseeable from LNG development in the vicinity of the proposed drainage project. The CP2 LNG refinery is proposed by Venture Global on Monkey Island just west of Cameron on the opposite side of the CLP and CP3 is proposed adjacent to Venture Global's Calcasieu Pass Loop. Various environmental impacts are foreseeable with the CP Express the pipeline planned to connect the CP2 terminal to the existing natural gas pipeline grid to the LNG the north.

The CP2 LNG is planned as as liquefaction and export facility with a one thousand one hundred and fifty (1,150)-acre terminal consisting of approximately 650 acres of impact with 170 acres on Monkey Island in Cameron Parish, Louisiana. LNG will be transported to CP2 via the CP Express natural gas pipeline originating in Jasper County, Texas, passing through Newton County, Texas, and Calcasieu Parish, Louisiana, before it ends at the CP2 LNG terminal in Cameron Parish, Louisiana. The CP Express pipeline is proposed to travel south along east side of Calcasieu Lake through the Cameron Creole Watershed, turning in westerly direction northwest of Creole and running west until reaching Cameron.
https://ventureglobal.com/projects-cp2/

Venture Global CP2 LNG proposes to reduce carbon dioxide (CO2) by producing cheaper and more reliable natural gas for electrical power sources and eliminating need for coal fired power plants. LNG is an affordable and cleaner fuel source than gasoline or electric for vehicles. LNG reduces carbon footprint impacts over gasoline as well as coal and does not rely on battery waste impacts associated with electric powered vehicles. This project proposal is beneficial to national energy mission and goals.

The proposed CP3 LNG along the western shoreline of Calcasieu Ship Channel would impact potentially 840 acres of property in Cameron Parish alone. Of the 840 acres, 140 acres of marsh creation within the Cameron Creole Watershed primarily within Cameron Prairie National Wildlife Refuge, mitigation measure is proposed as a $40 million wetland mitigation credit being banked to fully offset Calcasieu, Plaquemines, and CP2 project's adverse impacts to protected resources. [https://ventureglobal.com/about-us/safety-and-environment/calcasieu-project-impact/ accessed online Jun 4, 2025]

The existing Venture Global refinery is located on the south-side of Cameron along the east side of CLP at the mouth of the Calcasieu River and consist of approximately 432 acres of non-permeable harden landscape. Mitigation consisted of installing a 31.5-foot-high storm surge wall around the perimeter of the terminal to the north, east, and south of facility with a 26 foot high berm on the west perimeter – Calcasieu Loop Pass side of facility to mitigate storm-surge threats. Other mitigation measures include Project-specific *Upland Erosion Control, Revegetation, and Maintenance Plan and Wetland and Waterbody Construction and Mitigation Procedures.*

Mitigation measures included on-site storm-water retention on the refinery's property to reduce flooding events within the surrounding area. [https://ferc.gov/final-environmental-impact-statement-calcasieu-pass-lng-project accessed online Jun 4, 2025]

Venture Global trains and employs Louisiana residents, supports development for community needs and donates funds for environmental restoration projects. They are acting as a positive contributor to community interests, needs, and strive to be good stewards to the human and natural environment. Their commitment to providing cleaner energy is a driving force behind environmentally conscious design of their facilities. Venture Global is addressing impacts through various mitigation measures.

Relevant projects considered for cumulative effects under this NEPA EA did not find a significant impact resulting from the proposed Pump Station project actions under a cumulative effect evaluation.

Alternatives [24 CFR 58.40(e)]

Alternative 1: This alternative would include the entire scope of work depicted in permit design sheets at Exhibit H and as permitted through LDNR-OCM and USACE. Completing the entire scope of work, inclusive of installing drainage within State Highway 27/Marshall Street right-of-way, would provide the community with backup safeguards during heavy flooding events. Alternative 1 is the preferred alternative and would include all ditch work and Control Structure C – completed work prior to funding request - defined under Pump Station A area of influence. It supports redundancy and emergency backup controls to relieve the overburdened drainage system within the Pump Station C area of influence, thereby remediating the backflow of stormwaters into areas with Low to Moderate Income housing.

Alternative 2: This alternative eliminates the installation of Pump Station A basin area of influence for drainage improvements and associated ditch work. Alternative 2 focuses on Pump Station C basin area of influence for drainage improvements. It includes Pump Station C,

Control Structure B, and associated infrastructure connected to Control Structure B. This is not the preferred action because it does not support redundancy to account for emergency operating concerns arising at Pump Station C or support overburdened drainage during storm events of the Pump Station C basin area of influence with inclusion of Pump Station A basin area of influence. Residential housing would still potentially be subjected to stormwater backflow during long-periods of heavy rainfall and ponding of rainfall on roadways would continue to impact emergency response and therefore risk public safety. This alternative was considered but found not in the best interest for the community served.

No Action Alternative [24 CFR 58.40(e)]:

No Action: No action is not considered a viable choice. No action would result in continued endangerment to public welfare and safety with continued damages and costs associated with flooding of improved properties and public roadways. Work proposed by LWIP and LNG refineries has the potential to exasperate existing drainage issues. Additionally, obstruction of roadway passage during flood events further endangers public welfare due to lack of emergency accesses that may be warranted during storm events.

In conclusion, the cumulative effects from known ongoing, reasonably foreseeable, and Alternative 1 projects, would not have a significant (direct and cumulative) impact to the human and natural environment contingent upon compliance local, State, and Federal law and with mitigation measures stipulated under regulatory permits and this NEPA EA FONSI conditions.

Summary of Findings and Conclusions:

Mitigation Measures and Conditions

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

- All work must conform to conditions under OCM CUP P20220077 and USACE MVN-2020-00671-WLL permits. (See attached permits.)
- Any changes or modification to permitted work will require amendments to respective permits and reconsideration of impact determination identified under this NEPA EA. Substantive revisions may warrant additional permit authorization and alter NEPA determination.
- The Cameron Parish Police Jury (Drainage District 3) will develop a Pump Station Operation Management Plan defining pump operation and maintenance plans and may re-evaluate and refine the operation plan to support appropriate management and controls over pump stations' operation and maintenance for compliance with regulatory concerns.
- All work shall be done in accordance with the approved plans and shall be confined to the permitted work areas. This includes the operation plans for Pump Station A and C as well as Control Structure B defined in the permit plats.
- At the discretion of LDEQ Administrative Authority (LAC Title 33 Part IX), Cameron Parish Police Jury may be subject to regulatory oversight of drainage pump operations by

LDEQ LDPES and accountable for exceeding TMDL that is being monitored by USEPA through LDEQ LPDES programs. Cameron Parish Police Jury Drainage District will coordinate and collaborate with LDEQ to reach positive objectives and stipulations defined under LPDES permit and under proposed Operation Management Plans.

- If Total Maximum Daily Load (TMDL) exceed baseline levels established by EPA/LDEQ and notifies the drainage authority about concern, the Parish (Drainage District 3) will complete LDEQ's NOI for general permit and submit it to the LDEQ Administrative Authority (AA) for a determination prior to implementing discharges from the drainage system outflow pipes. The AA may determine no permit, general permit, or individual permit is required upon reviewing informational data provided under NOI, or the AA may seek clarification for discharges and management of drainage system. The permittee is required to work closely with LDEQ to clarify and address concerns. The permittee is required to be a person with jurisdictional authorities to implement controls and sign NOI. Permittee may be the local Drainage District Manager but must have the authority to sign on behalf of drainage authority and/or oversee implementation of management stipulations defined under permit. Discussions with the LDEQ AA as related to realistic management controls will result in final permit stipulated controls determinations and may require revision of Pump Station Operation Management Plan.
- Project construction work and drainage systems operations shall not discharge sewage, domestic wastes or containments into streams and waterways, natural or man-made, as defined by State Sanitary Code and LDEQ regulations, without authorization of the Louisiana Department of Health and/or LDEQ as relevant to discharge concerns.
- The proposed work area footprint is within a LDEQ Agency Interest (AI) for active underground storage tank (USTs). Disturbance of soils within the AI areas will require LDEQ Risk Evaluation/Corrective Action Program (RECAP) regulations and controls be created by Cameron Parish Drainage Authority and submitted to LDEQ for approval. The Parish drainage authority and contractor will coordinate implementation of the approved LDEQ site-specific RECAP evaluation to comply with these concerns. (See attached LDEQ response to solicitation of views.)
- Project work will need coordination with LDEQ Water Permits Division (225) 219-3590 for nonpoint source controls and obtain stormwater general permits for construction when cumulative construction areas equal or exceed one acre. The cumulative work area is approximately 13 acres. Stormwater general permit is required for discharges.
- Construction work shall consider the evidence of wildlife and wildlife nesting within work area footprints. The Parish contractor shall contact LDNR biologist [225-765-3554] if at any time rare, threatened or endangered species defined under the Wildlife Diversity Program report are encountered prior to or during construction within the project area. No threatened or endangered species within work areas were identified through a biological assessment.
- All earthen material, aggregate, debris, or any form of material hauled offsite will be disposed at an existing State approved and legal landfill and/or permitted site in conformance with the terms and conditions of the associated site authorization.
- All backfill materials shall be clean and free of contaminants and shall not contain hazardous materials such as asbestos or asbestos residue, shingles, tires, oil/grease residue, exposed rebar, protruding objects, etc. Backfill soils shall be brought in from off-site approved soil pit.
- All dredge/excavated, backfill soil activities, and construction shall comply with local

floodplain administrative ordinances.

- Project shall not diminish or degrade natural hydrologic conditions of jurisdictional wetland areas.
- Project work shall adhere to Manatee Special Conditions provided and defined under USACE Program General Permit for this work.
- Best management practices shall be used for erosion/siltation control measures around construction areas to aid in preventing project related sediments, debris and other pollutants from entering adjacent wetlands or waters.
- Construction work shall have a surety bond for an appropriate amount to ensure adjustment, alteration, or removal expenses are covered should the LDENR determine necessary modifications are warranted.
- No project work or operation of drainage system shall unreasonably interfere with navigation on the Calcasieu River. Any damages to the federal channel bank shall be repaired to USACE's satisfaction at CPPJ's expense. Mud or debris cannot be discharged into the federal channel, inclusive of CPL.
- US Coast Guard regulation shall be followed to include and not be limited to safety light, signals, and signs on authorized facilities or equipment. Any work within waterways will require notification with appropriate plans, permits and drawings to the appropriate Captain of the Port, so that a Notice to Mariners, if required, is provided one month prior to starting the work.
- Regulatory and management agencies' authorized representative, such as but not limited to, LDEQ, LDNR, USACE, or resource agencies, shall be allowed access to work site areas and system operation areas for periodic unannounced inspections to assure activities being performed are in accordance with Federal, State, and local laws.
- All structures shall be removed from the site within 120 days of abandonment or when structures fall into a state of disrepair such that they can no longer function as intended.
- Work for removal of said abandoned or damaged structure is not authorized under the current permits and does not waive requirements for additional permits for removal work.
- If during construction work, human remains are inadvertently discovered, work will stop at that location and local coroner and law enforcement will be contacted immediately to determine if human remains are associated with a crime scene. If local officials determine human remains are 50 years or older, CPPJ or contractor will contact the State Archaeologist and State Attorney General's office within 24 hours for appropriate actions related to Louisiana Unmarked Human Burial Sites Preservation Act. No work shall commence until concerns are resolve and further instructions for moving forward are provided to the CPPJ or contractor by authorized State investigators.
- No historic properties are known to exist within work area. Should archaeological resources, cultural artifacts, or features be inadvertently discovered during work, work will stop, and contractor will contact the State Division of Archaeology immediately to address concerns. No work will commence within this area until concerns are resolved, and further instructions are provided for clearing work area to move forward by the State Archaeologist.
- All construction work shall comply with local and State building codes and ordinances, inclusive of but not limited Local Floodplain ordinances.
- Upon completion of construction work, a certificate of completion by a registered professional engineer shall be provided to LDNR.

- All work, inclusive of post-construction work, must comply with applicable Federal, State, and local laws.

Law, Authority, or Factor	Mitigation Measure
River & Harbor Act of 1899 - Sections 9, 10 & 14 - USACE	Best management practices to include erosion controls/siltation around construction zones
Title 33 CFR Parts 320 thru 332 - USACE	Best management practices to include avoiding degradation of natural hydrologic conditions of protected wetlands.
Clean Water Act (33 USC 1344) - Sections 300 thru 404 and 408 USACE & EPA	Best management practices to include no discharge of pollutants into waters from drainage discharges as defined in Pump Station Operation Management Plan – inclusive of turbidity controls.
Title 40 CFR 230.40 thru 230.45 - USACE	Special aquatic sites – minimize impacts – turbidity control defined under Pump Station Operation Management Plan.
Marine Protection, Research and Sanctuaries Act (33 USC 1413) – Sec 103	No ocean dumping is proposed
Marine Mammal Protection Act – USFWS, NMFS	Manatee Special Conditions – impact avoidance. No work is proposed within waterways.
Endangered Species Act – USFWS, NMFS	Biological assessment of construction areas determined no protected species identified. Work crews will examine area prior to commencing work to avoid adverse impacts to wildlife.
Bald and Golden Eagle Protection Act - USFWS	Bald Eagle buffer zone from nesting areas – no nesting is identified.
Migratory Birds Treaty Act - USFWS	Buffer zone from nesting areas – no nesting is identified within work zones.
Flood Insurance – Flood Disaster Protection Act & National Flood Insurance Reform Act.	Pump station facilities will require Parish to obtain and maintain insurance for costs of constructed facilities.
Chapter 7 of Cameron Parish Ordinances, Flood Damage Controls	Proposed construction shall comply with local building codes, inclusive of local floodplain administration compliance.
Floodplain and Wetland Protection Executive Orders 11988 & 11990 & FFRMS 24 CFR Part 55	Best management practices to include erosion controls/siltation around construction zones as well as terms and conditions identified under CUP & USACE PGP (Exhibits E, F, and G)
Coastal Zone Management Act	Compliance with CUP #P2022007 with time extension term and conditions at Exhibits E & F and USACE PGP, #MVN-202-00671-WILL, Category II, terms and conditions at Exhibit G are required.
National Historic Preservation Act	Stop work order issued for inadvertent discovery of cultural items or features and contact State Archaeologist for further actions. No work shall commence until consult with tribes is completed and clearance to proceed with work is given by State Archaeologist.
Louisiana Unmarked Human Burial Preservation Act	Stop work order issued for inadvertent discovery of human remains and contact Local Law Enforcement and local coroner immediately for further actions for work to proceed.

Resource Conservation and Recovery Act (RCRA) – Contamination and Toxic Substances.	All excavated soil shall be treated as waste and removed to licensed off-site landfill for proper disposal. Coordinate with LDEQ prior to work within the following locations: 453 Marshall Street (AI# 76842); 409 Marshall Street (AI# 72731); 2574 Marshall Street (AI# 71639); 490 Marshall Street (AI# 75689); and 224 Carter Road (AI# 3267)
Louisiana Administrative Code (LAC) Title 33:VII, Chapter II & LAC Title 33:XI	Risk Evaluation/Corrective Action Program Regulation & Environmental Regulatory Code compliance. See RCRA mitigations above require coordinate and approval of work activities with LDEQ for work within abandon underground storage tanks as determine applicable from LDEQ.
National Environmental Policy Act	Compliance with all local, State, and Federal law and avoid/minimize adverse impacts to the natural and human environments. Significant changes in defined scope of work will require NEPA reconsideration.

Determination:

☒ **Finding of No Significant Impact** [24 CFR 58.40(g)(1)]

The project will not result in a significant impact on the quality of the human environment.

☐ **Finding of Significant Impact** [24 CFR 58.40(g)(2)]

The project may significantly affect the quality of the human environment.

Preparer Signature: Date:_____

Name/Title/Organization: Ellen Ibert, EHP Specialist, Royal Engineers and Consultant, LLC

Certifying Officer Signature: ___Date:_____Name/ Title: _____

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).