



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL OCEAN SERVICE  
OFFICE OF OCEAN AND COASTAL RESOURCE MANAGEMENT  
Washington, D.C. 20235

JUN 22 1987

RECEIVED

DEPT. OF OCEANIC RESOURCES  
COASTAL MANAGEMENT DIVISION

Dr. Charles Groat  
Assistant Secretary  
Coastal Management Division  
Louisiana Department of  
Natural Resources  
P.O. Box 44487  
Baton Rouge, Louisiana 70804-4487

Dear Dr. Groat:

The Office of Ocean and Coastal Resource Management (OCRM) has reviewed the resubmission, dated May 29, 1987, for incorporation of the Cameron Parish Coastal Resources Management Program (CPCRMP) into the Louisiana Coastal Resources Program (LCRP), as a routine program implementation pursuant to 15 CFR 923.84. We find that this change does not substantially change any enforceable policies or authorities related to implementation. Federal consistency will apply when you publish notice of our approval.

Sincerely,

Peter L. Tweedt  
Director





EDWIN W. EDWARDS  
GOVERNOR

DEPARTMENT OF NATURAL RESOURCES

B. JIM PORTER  
SECRETARY

March 19, 1985

MEMORANDUM

**TO:** All Interested Federal, State and Local Agencies and/or  
Individuals

**FROM:** L. Phil Pittman, Coastal Energy Impact Program Administrator *L.P.P.*

**SUBJECT:** Request for Routine Program Implementation for Cameron Parish  
Program

On March 11, 1985, the Secretary of Louisiana's Department of Natural Resources acknowledged receipt of and approved the Cameron Parish Coastal Management Program as submitted by parish officials in January, 1985. It is the determination of DNR that the acknowledgement and approval of the Cameron plan can be considered routine implementation of the federally approved Louisiana Coastal Resources Program (LCRP) pursuant to 15 CFR 923.84.

The approved parish program is considered by DNR to be consistent with all of the requirements of Act 361 (La. R.S. 49) and the Louisiana Coastal Resources Program and in no way alters (1) the existing coastal boundary, (2) uses subject to state and local concerns, (3) identification of particular areas, (4) consideration of the national interest involved in the planning and siting of facilities which are other than local in nature. Therefore, program admendment procedures of 15 CFR 923.81 - 923.82 would not apply to this acknowledgement and approval.

The federal Office of Coastal Resource Management (OCRM) has been notified of DNR's determination of routine program implementation. Should OCRM concur or fail to respond to DNR's determination within four weeks, the federal consistency provisions of Section 307 of the Federal Coastal Zone Management Act of 1972 will apply to the Jefferson Parish Coastal Management Program. Local governments, state agencies, and relevant federal agencies, as well as members of the general public, may comment within three weeks from the day of issuance of this letter, as to whether or not the acknowledgement and approval of this parish program represents routine program implementation pursuant to 15 CFR 923.84. Copies of the program are available for review at the Department of Natural Resources/Coastal Management Division and at the Cameron Parish Environmental Office. Comments should be submitted to: Ms. Ann Berger-Blundon, Gulf States Regional Manager, Office of Ocean and Coastal Resource Management, 3300 Whitehaven Avenue, N. W., Page Building 1, Washington, D. C. 20235.

DNR will provide further notice of concurrence, non-concurrence, or the failure to respond by OCRM. In the same notice, if appropriate, the date of applicability of federal consistency to the Cameron Parish Coastal Management Plan will also be stated.

If you should require any further assistance in your consideration of the routine program implementation action, please contact Mr. Phil Pittman.



Finding of Fact  
Pertaining to the Cameron Parish  
Coastal Management Program

On January 21, 1983 Cameron Parish officially submitted its local coastal program (LCP) to the Secretary of the Department of Natural Resources for approval pursuant to Section 213.9 of Act 361 (LA. R.S. 49:213.1 to 213.21).

The submittal of the Cameron LCP began the official ninety (90) day review period within which the Secretary was required to either approve the program or inform the parish of changes that must be made in order that the program could be approved. During this review period, the parish program was reviewed by various personnel in the Coastal Management and Legal Divisions of the Department of Natural Resources (DNR). The program was also submitted to other local, state, and federal agencies, that have an interest in the coastal program. A public notice was issued stating that the program was available for public review so that any interested or affected person or interest group could also make comments on the program. This is in addition to the public hearing previously held by Cameron Parish for the express intent of receiving input from local and regional federal, state and local agencies and/or individuals. A copy of the draft LCP was also forwarded to Washington (OCRM) for review and comments.

Following the completion of the Secretarial review period, and the required public hearing held by the State and Cameron's LCP, the Secretary of DNR informed the parish in writing on June 3, 1983 of the changes that would be required before the program could be approved. These revisions, both from the Coastal Management Division and the various federal and state agencies commenting at the State public hearing, included the following:

- 1.) The major concern was that the LCP did not clearly distinguish between uses of state concern and uses of local concern, nor did it properly interpret the authority vested in the parish for dealing with the two types of uses;
- 2.) Several portions of the hydrology section required rewriting because they were technically inaccurate;
- 3.) All maps, tables and figures were required to be labeled and credited;
- 4.) Additional causes of land loss (such as erosion, subsidence, salt water intrusion, etc.) were required to be identified and discussed;
- 5.) The discussion on botanical features was required to be expanded;
- 6.) The historical and cultural section required expanding to include a discussion on the types of features mapped in figure 11;

- 7.) The discussion of the canal backfilling issue as concerns the National Marine Fisheries Service policy was required to be deleted;
- 8.) More current land use data was required;
- 9.) Amendment No. 2 concerning mitigation by Cameron Parish was required to be revised to state that the parish could only require mitigation for uses of local concern but could recommend mitigation projects for uses of state concern.
- 10.) Maps depicting the natural resources, features and existing land use in each environmental management unit (EMU) were required.
- 11.) The role of the permitting agent was required to be defined and expanded as to his responsibilities and duties.
- 12.) In the administration section, it was required that it be clearly spelled out that a perspective permit applicant can submit his application either to the parish or the state.
- 13.) It was required that a section be added on the annual report due on LCP's.

The CMD/DNR staff worked closely with Cameron Parish officials and staff in revising the LCP according to the Secretary's comments. Various working meetings were attended by CMD and Cameron Parish officials and parish advisory committee members. However, before the revised document could be resubmitted Secretary Simoneaux posed several questions concerning local program policies overlapping into uses of state concern (as per Lafourche's LCP), and decided to withhold final approval on all local programs until these issues were resolved.

When the new Secretary of DNR assumed control in April, 1984 negotiations and meetings with Cameron officials and advisory committee members were resumed. Various revisions were reviewed by CMD, and in January, 1985 all revisions were completed. By letter dated March 11, 1985 the Secretary issued a letter of approval for the Cameron LCP.

Cameron's LCP will have a favorable impact on the parish in several ways. First, the parish will be granted implementation monies which they can use to establish a permitting process for uses of local concern, which at the present time are being handled by the State (DNR/CMD). The State also foresees the permit process as a means to improve coordination between the State and the parish, which will ultimately result in more efficient management and protection of the coastal areas of the parish. Second, the parish program will be a guide to any person who wishes to apply for a permit at the local level or who may just want to know more about the parish and its coastal areas. Third, the approved program and the permit process can establish procedures by which consistent permit procedures and policies can be established between the two levels of government.



The legal authority for the program was created by Act 361 (LA. R.S. 49:213.1-213.32) of the 1978 Louisiana Legislature. Rules and Procedures for the development, Approval, Modification, and Periodic Review of Local Programs became effective on September 20, 1980 after being published in the August 20, 1980 edition of the Louisiana Register, Volume 6, Number 8, page 493.

In accordance with Part III, of the Rules and Procedures, the requirements for local program content are listed below. The method of compliance by the Cameron Parish Coastal Management Program is indicated for each requirement.

(A) A summary of the local program.

Pages 2-4 of the Cameron LCP give a history of the federal, state and local coastal zone management programs. The local program, which began in 1976, include a list of all present and past citizens advisory committee members and a statement of the problems, goals and objectives to be developed by the program. Problems identified in the document include such factors as saltwater intrusion, water pollution, erosion, subsidence, waste disposal, wetland loss, and mitigation measures. All of these problems are discussed throughout the documents in great detail.

(B) Maps and descriptions of the natural features, resources, existing land use in each management unit. These maps shall depict the division of the coastal areas into coastal waters and wetlands, transitional areas, fastlands and lands more than five feet above mean sea level.

The Cameron Parish program divides the entire parish into six (6) grouped and four (4) non-grouped environmental units. These management units are specific areas in the parish which have their own unique characteristics and problems. Each unit therefore has its own specific goals, objectives and policies.

Cameron's LCP (pages 19-83) describes in great detail all the natural features, resources, and existing land use in each management unit, including a map of each EMU depicting unit boundaries. Each EMU and its accompanying map include discussion on location, topography, unique ecological features, soils, subsidence, land loss potential, hydrology, landuse, and other factors or appropriate. The problems of each EMU are then stated, and the goals, policies and objectives to overcome these problems are discussed. In addition, the maps and the EMU discussions depict the areas considered wetlands, coastal waters and fastlands. Since the entire parish is within the coastal zone, and since an overwhelming amount of the parish is considered wetlands, most of the EMU goals, policies and objectives reflect wetland problems. The measures to be taken by Cameron Parish are considered sufficient in nature to allow both the parish and the State CMD to make sound management decisions on all permit application.

(C) The results of the social and economic analysis carried out pursuant to Section II-B, (Program Development) on page c2-1 of the Louisiana Coastal Resources Program.

An in-depth socio-economic profile is included in the Cameron program on pages 84-123. In general, the vast amount of wetland areas contained within Cameron Parish affects almost all aspects of its profile-low population density, limited growth potential, job classifications, housing, educational needs, recreation, etc. The physical needs of the parish (basic requirements for existence and growth) include the following: an available supply of developable land; a large supply of freshwater; sites for dumping industrial wastes; protection of wildlife and fisheries; and a more efficient highway system. The most serious physical problem in the parish is drainage, since most of the wetland areas are below sea level.

The social needs of the parish are identified as education, health care, police and fire protection, sewerage and waste disposal, acreage for future residential development, and planning. The most serious of these problems is the overcrowding in the school system.

Economic needs of the parish are divided into two categories - physical prerequisites and employment requirements for future growth. Developable land is the biggest physical need, since most of the parish is wetlands. Drainage is another major problem. Water, industrial waste sites, and the other factors mentioned above complete the list. Because the resources for economic expansion are limited, Cameron's economy has become industry specific. Petroleum and seafood industries are the main employment categories, with government, services, wholesale and retail, and manufacturing considered of secondary importance.

All of the above socio-economic characteristics are discussed in detail within the Cameron LCP.

- (D) A description of those existing and future resource-use conflicts identified pursuant to Section II-C, (Program Development) on page c2-1 of the Louisiana Coastal Resources Program.

Resources, resource users, and conflicts occurring through competing users are discussed in great depth on pages 124-162. The main resource users and resources listed in the document consist of the following: agriculture, fisheries and wildlife, recreation, tourism, construction, transportation, oil and gas industries, and non-fuel minerals. The major resource use conflicts identified and discussed in the program include the following: wetland designation and potential farmland; cattle grazing in marshlands; marsh policies of different agencies; landowners, taxpayers and recreational fishermen; marsh disruption from energy exploration; injection wells and hazardous wastes; docking facilities for fisheries; residential construction versus vegetation loss; regulation of water levels for competing uses; recreation versus industry; and transportation versus saltwater intrusion. All of these problem areas are mapped to the extent possible, and discussions are contained in each of the applicable EMU's.

- (E) An identification of those particular areas, if any, requiring special management as described in Section II-D of Appendix c2 of the L.C.R.P., the special policies and/or procedures to be applied to these areas.

The Cameron Parish LCP does not identify any particular areas to be designated at this time. They do, however, retain the right to identify



particular areas in the future, along with the appropriate policies and/or procedures.

- (F) 1. Statement of the goals, objectives, policies and priorities of uses included in the program, as described in Section II-E Appendix c2 of the L.C.R.P.

Cameron's program document contains specific goals, objectives and policies for the parish as a whole (pages 165-172) and for the individual environmental management units (pages 174-244). Parishwide objectives and policies include such issues as saltwater intrusion, subsidence and erosion, natural water flow, flooding, shoreline stabilization, planned development, channelization, etc. Individual EMU goals, objectives and policies locate these problems within identified, site specific areas so that they can be more easily managed. The CMD has found these goals, objectives and policies to be specific and definitive enough to guide both the parish and the state in their decision making processes.

2. A statement assuring that the policies of the local program are consistent with the policies and objective of Act 361 and the state guidelines and that the local program shall be interpreted and administered consistently with such policies, objectives and guidelines.

Section I, page 10 and the Cameron ordinance contain statements assuring the State that all policies and objectives of Act 361 are consistent with the parish program.

After having thoroughly reviewed the Cameron plan, the CMD and legal staffs have determined that the overall policies for the parish as well as the policies for each individual E.M.U. were carefully constructed so that the wetlands and water bodies of the parish could be protected from such factors as saltwater intrusion and erosion. The parish officials also coordinated closely with the DNR staff when developing the policies of the parish program. The parish officials worked closely with the DNR staff to incorporate changes that were requested pertaining to their parish plan. The plan is considered by the staff of DNR to be a well prepared document which is consistent with the State program and which will help protect as well as enhance the coastal areas of the parish.

- (G) A description of the authorities and administrative arrangements regulating uses of local concern, for reviewing, issuing, and monitoring local coastal use permits, and for enforcing the local program, including:

1. A concise explanation of how the local coastal management process is to work.

Section VI, pages 245-260 describe in great detail how Cameron's local program will work. A permitting agents office will be established to review, issue and monitor permits for uses of local concern. The responsibilities of the agents office will consist of the following:

- a) accept permit applications
- b) determine whether of state or local concern and

- forward determination to state
- c) monitor the permit for compliance with any conditions or specifications
- d) review plans for consistency with waste program occurring in Cameron parish
- e) comment on all state uses within the 25-day deadline.

Staff requirements will include the permitting agent and an administrative assistant who will handle office tasks and accept permit applications in the absence of the permit agent.

2. A description and listing of those areas and uses that will normally require local coastal use permits.

The Cameron LCP discusses those areas and uses normally requiring local coastal use permits on pages 253-254. The problems and recommended solutions identified in the EMU section state the particular areas certain permits are required, and since the entire parish is within the coastal zone boundary the whole parish is discussed. Uses of local concern, as described in Section 213.5A2 of Act 361, are listed on page 254 and include the following: privately funded projects which are not uses of state concern; publicly funded projects which are not uses of state concern; maintenance of uses of local concern; jetties or breakheads, camps and cattledwalks; maintenance dredging; private water control structures of less than \$15,000 in costs; and uses on cheniers, salt domes or similar land forms. Local uses are also listed in the Cameron CZM ordinance on pages 265-266.

3. An illustrative list of particular activities which occur either in fastlands or on lands more than five feet above mean sea level that have direct and significant impacts on coastal waters.

Activities which occur either in fastlands or on lands more than five feet (5') MSL that could have a direct and significant impact on coastal waters are discussed on page 253 of Section VI of the LCP. In addition, the Cameron Parish ordinance (pages 267-268) discusses exempted uses which affect coastal waters and how a determination is made as to whether or not the activity requires a coastal use permit.

The activities which Cameron's plan lists which may affect coastal waters includes discharges of industrial or public waste, discharges of pollutants into coastal waters, subdivision runoff, oil spills in industrial canals, injection wells, agricultural chemicals in farmlands, and municipal dumps located near coastal waters.

4. An analysis of all ordinances included in the local program demonstrating that the effect of such ordinances, when applied to uses not subject to the local coastal use permit



program, would result in compliance with the goals and provisions of Act 361, the objectives of the L.C.R.P., and the policies of the coastal use guidelines.

As stated on pages 248-249, Cameron's ordinances were reviewed for consistency with the proposed coastal zone management ordinance. Only two (2) ordinances have guidelines which fall with the concerns of coastal management - Section 7 of the Flood Hazard and Control Ordinance, and Article II of Section 19: Roads and Drainage. Article II requires a parish permit for any oil exploration activities. However, since oil and gas activities are a use of state concern, the ordinance is not included as part of the local program. Both of these sections have been deemed to be in compliance with the goals and provisions of Act 361. In addition, CMD will review the parish program on an annual basis to insure that ordinances are not developed would could adversely affect the parish or state coastal management programs.

5. A description of the administrative means by which the parish will coordinate with other governmental bodies during program implementation regarding:

- a) local program implementation, including copies of any interagency or intergovernmental agreements,

The administrative procedures for implementing the LCP are described on pages 255-259, as well as in the Cameron CZM ordinance on pages 270-273. In both instances, the Cameron Parish Police Jury, through the permitting agent, must seek to coordinate meetings with the involved parishes or state and federal agencies. Through the close working relationship the CMD has had with the parish in formulating their LCP, the state feels assured that multi-parish agreements are agreeable to, and indeed recommended, by Cameron Parish officials. There currently are no parish interagency or intergovernmental agreements that would affect the Cameron program.

- b) Multiparish environmental considerations,

As stated above, the Cameron Parish Police Jury, through its permitting agent, will coordinate meetings involving multiparish activities.

The parish has continually expressed the interest in coordinating such activities with any and all parties concerned. At this time, however, there are no memoranda of understanding between any parishes, because only recently have any parish programs been approved by the state and none to date have been incorporated into the state plan.

- c) Consideration by the parish of regional, state or

national interests.

Copies of the draft LCP were submitted to the appropriate federal, state and local agencies for their review and comment before the parish held its public hearing in December, 1982. In addition, the local and state public hearings file, both being properly advertised beforehand, were held open for ten (10) days to allow all interested persons to forward their comments to the parish or state. All comments received and answered were reviewed by the CMD staff and were found to be adequately addressed.

In addition, all meetings of the Cameron Coastal Advisory Committee (from 1976 to present) were posted in the Police Jury building well in advance, offering any interested persons and/or agencies input into the development of the plan from its inception. Cameron Parish worked diligently to meet all requirements for program implementation and are to be commended for a job well done.

- d) Regional, state or national plans affecting the parish coastal zone and other projects affecting more than one parish.

Regional, state or national interest projects and plans, as described on pages 247-248, will be reviewed on a case by case basis, just as will all permit applications. As stated in the document, regional state and federal interests are uses of state concern. Cameron's permitting agent will be commenting on uses of state concern within the 25-day deadline.

- 6. Certified copies of all ordinances, plan, program, and regulations proposed to be included in the program.

The parish coastal management ordinance is presented on pages 262-278 of the local plan. The parish does not propose to include any additional ordinances in the program at this time.

- 7. A resolution from the governing body of the parish expressing approval of the local program as submitted and its intent to implement the submitted program subsequent to state approval.

The Cameron Parish Police Jury met in special session on Tuesday, January 4, 1983 to adopt and approve the Coastal Zone Management Plan for Cameron Parish, as presented. The plan was adopted and approved, and a copy of the proceedings is included in the local program document.

- (H) Documentation that the parish has provided a full opportunity for



governmental and public involvement and coordination in the development of the local program. It must be shown that:

1. At least one public hearing was held in the coastal zone on the total scope of the proposed program.

Cameron Parish held its public hearing on the final draft at the Cameron Parish Police Jury building on December 7, 1982. A copy of the comments and responses are included in the program document on page 286. In addition, the state held its public hearing at the Cameron Parish Police Jury building on May 11, 1983.

2. Public notice of the availability of the draft proposed program was given at least 30 days prior to the hearing. Copies of the program must have been available for distribution to relevant state, federal and local governmental agencies and the general public and were available for public inspection at reasonable hours at all libraries within the parish, the offices of the police jury, and the city or town hall of 11 municipalities in the coastal zone.

Public notice for the December 7, 1982 public hearing was first published in the local parish journal on November 4, 1982. The notice stated that copies of the draft document were available for public review at the public library, courthouse and police jury building. Interested citizens were invited to attend or submit written comments. The notice was run on November 4, 11, 18, and 25 and on December 2.

At the time of the first public hearing notices approximately twenty-five (25) relevant federal, state and local agencies were sent copies of the draft program for their review and comment.

Public notice for the state's public hearing was published in the official state journal on March 5, 1983, again stating the availability to the public of copies of the draft program.

3. Full consideration was given to comments received during program development and the public hearings.

Only two comments were received at the parish's public hearing—one concerning saltwater intrusion in the Cameron/Creole EMU and one comment on flooding and saltwater intrusion in the Hog Bayou Management Unit. Policies were added to each of the EMU's dealing with these problems. Copies of the hearing comments and responses are included in the document on pages.

Comments from federal, state and local agencies who received copies of the draft document, along with

comments from the state's public hearing, were also received and required extensive revisions to the program (as per the Secretary's June 3, 1983 letter which has been previously discussed).

All of the comments and responses to all issues have been reviewed by the CMD staff. It is felt that the parish has done a commendable job of responding to all comments in a timely and professional manner. The program has been deemed consistent with the state CZM plan.