

# NEPA Summary Report and Checklist

**Proposed Free Standing Telecommunications Tower  
St. James Parish Emergency Communications Center  
5800 Highway 44  
Convent, St. James Parish, Louisiana**

May 11, 2011

Terracon Project No. EH117034

**Prepared for:**

Daley Tower Service, Inc.  
Carencro, Louisiana

**Prepared by:**

Terracon Consultants, Inc.  
Baton Rouge, Louisiana

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**Terracon**

Geotechnical ■ Environmental ■ Construction Materials ■ Facilities

May 11, 2011



Daley Tower Service, Inc.  
1223 W. Gloria Switch Road  
Carencro, Louisiana 70520

Attn: Mr. David Comeaux

Re: NEPA Summary Report and Checklist  
St. James Parish Emergency Communications Center  
5800 Highway 44  
Convent, St. James Parish, Louisiana 70723  
Project No. EH117034

Dear Mr. Comeaux:

Terracon Consultants, Inc. (Terracon) is pleased to submit the enclosed NEPA Summary Report and Checklist for the above-referenced site. This assessment was performed in accordance with our proposal dated January 26, 2011.

We appreciate the opportunity to be of service to you on this project. In addition to NEPA Compliance Screening, our professionals provide geotechnical, environmental, construction materials, and facilities services on a wide variety of projects locally, regionally and nationally. For more detailed information on all of Terracon's services please visit our website at <http://www.terracon.com>. If there are any questions regarding this report or if we may be of further assistance, please do not hesitate to contact us.

Sincerely,

**Terracon Consultants, Inc.**

A handwritten signature in blue ink, appearing to read 'Adam V. Kiehn'.

Adam V. Kiehn, M.S.  
Staff Geologist

A handwritten signature in blue ink, appearing to read 'William S. Anderson' with 'for' written below it.

William S. Anderson, PE  
Senior Environmental Engineer

Attachments



Terracon Consultants, Inc. 2822-B O'Neal Lane Baton Rouge, Louisiana 70816

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**NEPA SUMMARY REPORT AND CHECKLIST  
ST. JAMES PARISH EMERGENCY COMMUNICATIONS TOWER  
CONVENT, ST. JAMES PARISH, LOUISIANA**

**Project No. EH117034  
May 11, 2011**

**EXECUTIVE SUMMARY**

Terracon has completed an environmental screening of the Federal Communications Commission (FCC) special interest items as outlined in Title 47 of the Code of Federal Regulations (47 CFR) Section 1.1307 (a) (1) through (8), for the proposed Daley Tower Service, Inc. site number 62789, and designated as TCNS ID No. 74392, located at 5800 Highway 44, Convent, Louisiana (the "site"). This NEPA Compliance Report and NEPA Checklist was completed in accordance with Terracon's proposal dated January 26, 2011. The NEPA Compliance Checklist is attached to this report.

The site consists of undeveloped property proposed for development as a 400-foot self-support cellular communications tower to replace an existing adjacent 300-foot tower at the St. James Parish Emergency Communications Center. The property is located in a parking lot at the complex located at 5800 Highway 44 in convent, Louisiana. The communications tower compound will compose approximately one half acre of land with a centerline latitude 29° 59' 41.9" N and a longitude 90° 49' 02.7" W, and is located in a rural area.

The proposed construction activities at the site include the construction of an self-support communications tower standing approximately 400 feet above ground level. An approximate 100-foot by 100-foot compound will be constructed surrounding the communications tower. Electricity and telephone service will extend via aboveground transmission lines to connect with the tower.

Based on investigation of the property to comply with FCC Regulations, Terracon has no recommendations for further activities at this site.

A FCC Checklist has been complied and completed for this site. This summary does not contain all the information that is found in the full report. The report should be read in its entirety to obtain a more complete understanding of the information provided and to aid in any decisions made or actions taken based on this information.

**NEPA Compliance Report and Checklist**

St. James Parish Emergency Tower ■ Convent, Louisiana  
 May 11, 2011 ■ Terracon Project No. EH117034



<b>Daley Tower Service, Inc. – NEPA Land Use Compliance Checklist</b>					
<b>Site Type (choose one):</b> <input checked="" type="checkbox"/> Raw land <input type="checkbox"/> Tower collocation* <input type="checkbox"/> Other collocation*	<b>Site ID/TCNS No.:</b> 74392	<b>Site Name &amp; Address:</b> St. James Parish 911 Tower 5800 Highway 44 Convent, LA, 70723	<b>Coordinates (NAD 83):</b> Lat: 29° 59' 41.9" N Long: 90° 49' 02.7" W		
NEPA Category	Expert Federal / State Jurisdictional Agencies	Check appropriate box(es) below			
		No Adverse Impact	Potential Adverse Impact	Categorically Excluded from Review*	Collocation Agreement or NPA Applies
1. Designated Wilderness Areas	National Park Service, US Forest Service, Bureau of Land Management (BLM)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Designated Wildlife Preserves	National Park Service, US Forest Service, BLM	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Threatened or Endangered Species & Critical Habitats	US Fish & Wildlife Service - Field Office (USF&WS)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Historic Places	State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Collo Agreement <input type="checkbox"/> NPA <input type="checkbox"/>
4a. Historic Places	American Indian Tribes, Native Hawaiian Organizations (NHO)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Collo Agreement <input type="checkbox"/> NPA <input type="checkbox"/>
5. Indian Sites of Religious and Cultural Significance	American Indian Tribes, Bureau of Indian Affairs, THPO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Floodplain	Federal Emergency Management Agency (FEMA)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Wetlands, Deforestation & Surface Waterways	US Army Corps of Engineers (ACOE)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. High Intensity White Lights in Residential Neighborhoods	N/A	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

The undersigned has reviewed and approved the completion of this NEPA Checklist for the above-mentioned site.

Prepared by: Terracon, 2822-B O'Neal Ln, Baton Rouge, Louisiana, (225) 344-6052.

Signature:  Title: Staff Geologist

Printed Name: Adam V. Kiehn Date: April 18, 2011

## **1.0 PROJECT BACKGROUND**

The site is shown with a one-mile radius area of potential of effect on the USGS Lagan and Convent, Louisiana 7.5-Minute Series Topographic Maps, dated 1998, on Figure 1. Based on the topographic map, the elevation of the site is located approximately 20 feet above National Geodetic Vertical Datum (NGVD) with a relatively flat topography. Storm water runoff from the site would likely flow to the north, towards Bayou des Acadiens which is located approximately 4,420 feet from the site (Figure 1). The nearest water body is a pond located approximately 820 feet to the north-northwest of the site.

Daley Tower Service, Inc. is proposing to build a 400-foot self-support telecommunications tower with associated antennas and equipment enclosures within the existing St. James Parish government complex. The site is currently a parking lot adjacent to an existing 300-foot communications tower and is accessed through the complex parking lot from Highway 44. Existing power and telecommunications lines will be extended from the existing tower.

For the purposes of this study, Terracon has utilized an environmental impact zone for the proposed construction of one-eighth of a mile, based on the minimal grading and disturbance normally associated with tower construction, operation and maintenance. Exceptions to this were made for National Scenic Trails and Rivers and for Item 4 (National Register of Historic Places). A one-mile radius environmental impact zone was used to evaluate impact on National Scenic Trails and Rivers. A three-quarter mile area of potential effect was used to evaluate Item 4 (National Register of Historic Places) in accordance with The Nationwide Programmatic Agreement Regarding the Section 106 National Historic Preservation Act Review Process (NPA). The following information provides Terracon's rationale for selection of either "No Adverse Impact" or "Potential Adverse Impact" for each item of the checklist attached to this report.

## **2.0 NEPA ASSESSMENT**

### **2.1 Wilderness Areas**

Terracon reviewed the USGS 7.5-minute quadrangle maps titled Lagan and Convent, Louisiana, dated 1989, the Louisiana Highway Map and the Louisiana page of the National Wilderness Preservation System website (<http://www.wilderness.net>). This review showed that no designated wilderness preserve is located within 1.5 miles of the site. Additionally, Terracon accessed the National Park Service website (<http://www.nps.gov>) on March 31, 2011. No national parks, forests, refuges, preserves, or other area regulated by the National Park Service, was shown to be located within 1.5 miles of the site.

Terracon reviewed the National Wild and Scenic Rivers System website (<http://www.rivers.gov>) on March 31, 2011. This review showed that there is one national wild and scenic river in

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St. James Parish Emergency Tower ■ Convent, Louisiana

May 11, 2011 ■ Terracon Project No. EH117034



Louisiana. The national wild and scenic river nearest the site is Black Creek, which is located approximately 125 miles to the northeast in Wiggins, Mississippi. Terracon also reviewed the Louisiana Scenic Rivers System website (<http://www.wlf.louisiana.gov/wildlife/scenic-rivers>) on April 12, 2011. This review showed that the nearest state scenic river is Blind River, located approximately 7 miles to the north-northwest of the site. A copy of the Louisiana Scenic Rivers System Map is included in Appendix A.

This was confirmed by the development on-site as part of the St. James Parish government complex which precludes it from being a wilderness area.

Based on this information, the site is not located in a designated wilderness area and "No Adverse Impact" was marked for Item 1 on the NEPA Land Use Compliance Checklist.

### **2.2 Wildlife Preserves/Refuges**

Terracon reviewed of the USGS 7.5-minute quadrangle maps titled Lagan and Convent, Louisiana, dated 1989, and the National Wilderness Preservation System website (<http://www.wilderness.net>) on March 31, 2011. This review showed that there are no officially designated wildlife areas or preserves located within 1.5 miles of the site. Terracon's review of the US Fish and Wildlife Service, Southeast Region's website on March 31, 2011 indicated that no wildlife refuges were located within 1.5 miles of the site. Additionally, Terracon reviewed the National Park Service website (<http://www.nps.gov>) on March 31, 2011. No national parks, forests, refuges, preserves, scenic trails, wild and scenic rivers, or other area regulated by the National Park Service, were shown indicated to be located within 1.5 miles of the site. Based on this information "No Adverse Impact" was marked for Item 2 on the NEPA Compliance Checklist.

### **2.3 Threatened or Endangered Species/Critical Habitats**

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

According to the Louisiana page of the USFWS Threatened and Endangered Species System website (<http://www.fws.gov/endangered/>), threatened or endangered species are known to exist in St. James Parish. The proposed tower will be located at the St. James Parish government complex with a wooded parcel adjacent to the west of the site. The government complex is located in a rural residential area near the Mississippi River levee on the gently sloping natural levee deposits. A copy of the USFWS Critical Habitat Map for the vicinity of the site is included in Appendix A.

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The Gulf Sturgeon (*Acienser oxyrinchus desotoi*) is listed as a threatened fish species in St. James Parish. Gulf Sturgeon spawn in long, spring-fed, free-flowing rivers and migrate into marine waters in fall and winter. The proposed tower is located outside the Mississippi River Levee and is not anticipated to directly impact the river or other critical habitat for the Gulf Sturgeon.

The Pallid Sturgeon (*Acienser scaphirhynchus*) is listed as an endangered fish species in St. James Parish. Pallid sturgeon are found in the Mississippi River where they are adapted for living close to the bottom of the swift, silty river in sand flats and gravel bars. The proposed tower is located outside the Mississippi River Levee and is not anticipated to directly impact the river or other critical habitat for the Pallid Sturgeon.

The West Indian Manatee (*Trichechus manatus*) is listed as an endangered mammal in St. James Parish. Manatees are found in marine, estuarine, and freshwater environments. The proposed tower is located outside the Mississippi River Levee and is not anticipated to directly impact any aquatic environment or other critical habitat for the West Indian Manatee.

A review of the list of identified critical habitats, codified at 50 CFR Sections 17.95, 17.96 and Part 226, indicated the site is not located in a designated critical habitat. Based on a comparison of habitats indicated for the threatened and endangered species and the habitat present at the site, no species were identified with potential to be found on the site.

In conforming to the United States Fish & Wildlife Service's "Service Interim Guidelines for Recommendations on Communications Tower Siting, Construction, Operation, and Decommissioning", this project consists of the construction of a new tower that will be 400 feet tall, and will not utilize guy wire. The fenced tower and equipment compound will be located in an existing parking lot; adjacent undeveloped areas are not expected to be directly affected. Therefore, potential adverse impacts to migratory birds and threatened or endangered species will be minimized or avoided.

In order to determine if the site is located in an area documented to have occurrences of listed and/or proposed threatened or endangered species, Terracon contacted USFWS Louisiana Ecological Services Office. A consultation response letter from the USFWS dated March 24, 2011 indicated that the proposed undertaking is not likely to adversely affect federally-listed threatened or endangered species, or adversely affect any designated critical habitat. A copy of this correspondence is included in Appendix B. While the USFWS concurred that no threatened or endangered species would be affected by tower construction, the agency did express concerns regarding migratory birds and offered suggestions for avoiding bird collisions (see attached). Based on the above considerations, "No Adverse Impact" was marked for Item 3 on the NEPA Land Use Compliance Checklist.



## **2.4 Historic Places**

Section 106 of the National Historic Preservation Act of 1966 (NHPA, 16 U.S.C. §§ 470 *et seq.*) and its implementing regulations, “Protection of Historic Properties” (36 CFR Part 800), require federal agencies to take into account the effects of their undertakings on historic properties. According to information on the National Register Information System (NRIS; <http://nrhp.focus.nps.gov/>); the National Register of Historic Places (NHRP; <http://www.cr.nps.gov/nr/>); and the Louisiana Cultural Resources GIS Map (<http://www.crt.state.la.us/hp/>) websites, no historic structures and one archaeological site were determined to be located within the 1-mile area of potential effect (APE). A review of the information available at the Louisiana State Historic Preservation Office (SHPO) indicated the archaeological site (16SJ31) has been determined by the SHPO to be ineligible for listing on the NHRP

The Louisiana Department of Culture, Recreation and Tourism (LDCRT), State Historic Preservation Office (SHPO), was contacted on March 4, 2011 with regard to the construction of the proposed communication tower at the site. Terracon stated that the proposed development would have “no effect” on districts, sites, buildings, structures, objects listed or eligible for listing on the National Register of Historic Places. Written correspondence from SHPO, dated April 12, 2011, indicated that no known archaeological sites or historic properties will be affected by the proposed development. A copy of the correspondence with SHPO is included in Appendix B of this report.

Based on these considerations, “No Adverse Impact” was marked for Item 4 on the NEPA Land Use Compliance Checklist.

### ***Tribal Consultation***

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

To identify Indian tribes that may have cultural interest in the area of the proposed undertaking, Terracon or Carrier contacted the FCC’s online Tower Construction Notification System (TCNS) to initiate tribal participation. Approximately thirty-one days after the “Notice of Organizations Which Were Sent Proposed Tower Construction Notification Information,” Terracon issued follow-up letters to tribes that had set geographic preferences on TCNS and that had not responded to the initial TCNS notification. Tribes were also sent letters, faxes, and/or e-mails to address specific information requests. If Tribes did not respond within approximately 10 days of the follow-up letter Terracon or Carrier utilized TCNS to refer the tribes to FCC for government

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to government consultation (copies of correspondence are included in Appendix B). A 20-day period has elapsed since the TCNS referral to the FCC and no further tribal responses have been received, therefore, in accordance with the FCC Declaratory Ruling FCC 05-176, the Tribal participation process is considered complete.

Specific tribal notification information/dates are as follows:

TCNS Notification ID number: 74392, submitted March 3, 2011

TCNS FCC Initial Notification Date: March 11, 2011

Follow-up Letters Dated: April 4, 2011

TCNS FCC Referral / Final Notice Date: April 21, 2011

TCNS FCC Referral / Final Notice to Tribes Date: May 11, 2011

The following table summarizes the tribal participation efforts and the tribes' responses with respect to properties of traditional religious or cultural significance that meet the National Register criteria:

	TCNS Notification	31 day Follow-up letter / fax / e-mail sent	Other follow-up letter / fax / e-mail sent	Referred to FCC for gov't to gov't consultation	No Interest statement contained in TCNS notification email, after 30 days from TCNS, statement by letter / fax / e-mail notification	Referral time period expired
Alabama Coushatta Tribe of Texas	√	√	√			
Coushatta Indian Tribe	√	√		√		√
Chitimacha Tribe of Louisiana	√				√	
Mississippi Band of Choctaw Indians	√	√		√		√
Choctaw Nation of Oklahoma	√	√		√		√
Kialegee Tribal Town	√				√	
Seminole Nation of Oklahoma	√				√	
Tunica-Biloxi Indians of Louisiana	√	√		√		√

The Alabama Coushatta Tribe of Texas required the submittal of a Form 620 information packet with a \$300 consultation fee. Terracon prepared this submission and followed up with the tribe on April 28, 2011. Terracon received a response from this tribe on May 2, 2011 that indicated no immediately known impacts to religious, cultural, or historical assets of the Alabama-Coushatta Tribe of Texas would occur due to the planned tower project. The response did indicate that the tower site is in proximity to migratory routs and habitation sites utilized by

## NEPA Compliance Report and Checklist

St. James Parish Emergency Tower ■ Convent, Louisiana

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ancestral members of the tribes, and requested immediate notification and halt to construction if human remains and/or archaeological artifacts are discovered.

Based on the referenced information, further evaluation of this item is not warranted and “No Adverse Impact” was marked for special interest Item 4a on the NEPA Land Use Compliance Checklist. However, if artifacts or human remains are unearthed during tower construction, Terracon recommends that the client stop construction and notify our office immediately.

### **2.5 Native American Religious Sites**

In addition to Section 106 tribal consultation addressed in special Item 4 above, Executive Order 13007 and the Native American Indian Religious Freedom Act, impose obligations for tribal consultation independent of Section 106 and NHPA.

A review of maps and data available from the Bureau of Indian Affairs (BIA) revealed no Native American owned lands in the immediate vicinity of the site. In addition, the Native American Consultation Database (NACD; <http://www.nps.gov/nacd/>) website was researched to determine Native American tribes with a potential religious or cultural interest in the proposed project. The search revealed no Native American tribes with a documented interest in St. James Parish.

To identify Indian tribes that may have cultural interest in the area of the proposed undertaking, Terracon registered the proposed St. James Parish Emergency Communications tower development with the Tower Construction Notification System (TCNS) on March 3, 2011; and received the TCNS Notification ID 74392. The TCNS identified and notified eight federally recognized Native American Tribes who set geographic preferences which included the project area on March 11, 2011. Approximately thirty-one days after the “Notice of Organizations Which Were Sent Proposed Tower Construction Notification Information,” Terracon issued follow-up letters to tribes that had set geographic preferences on TCNS and that had not responded to the initial TCNS notification. Tribes were also sent letters, faxes, and/or e-mails to address specific information requests. If Tribes did not respond within approximately 10 days of the follow-up letter Terracon or Carrier utilized TCNS to refer the tribes to FCC for government to government consultation (copies of correspondence are included in Appendix B). A 20-day period has elapsed since the TCNS referral to the FCC and no further tribal responses have been received, therefore, in accordance with the FCC Declaratory Ruling FCC 05-176, the Tribal participation process is considered complete.

In addition, the Alabama-Coushatta Tribe of Texas required the submittal of a Form 620 information packet with a \$300 consultation fee. Terracon prepared this submission and followed up with the tribe on April 28, 2011. Terracon received a response from this tribe on May 2, 2011 that indicated no immediately known impacts to religious, cultural, or historical assets of the Alabama-Coushatta Tribe of Texas would occur due to the planned tower project. The response did indicate that the tower site is in proximity to migratory routs and habitation

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sites utilized by ancestral members of the tribes, and requested immediate notification and halt to construction if human remains and/or archaeological artifacts are discovered.

Based on these considerations, Terracon marked “No Adverse Impact” in special interest Item 5 of the NEPA Land Use Compliance Checklist.

### 2.6 Flood Plain Records Review

Executive Order 11988 referred to in 47 CFR § 1.1307(a)(6) defines a floodplain as the “lowland and relatively flat area adjoining inland and coastal waters...including at a minimum, that area subject to a 1 percent or greater chance of flooding in any given year.” This definition is often referred to as a “100-year floodplain.” Based on a review of the applicable Federal Emergency Management Agency (FEMA) compiled Flood Insurance Rate Map (FIRM), Panel No. 220261-0075B, revised July 13, 1982 retrieved from the FEMA (<http://msc.fema.gov>) website, the site is located in Zone C, in an area of minimal flood hazard above the 500-year flood level. Therefore, the development of the site is not anticipated to affect areas of the 100-year flood zone. Based on the findings of this review, no further evaluation is required for this item and “No Adverse Impact” was marked for Item 6 on the NEPA Land Use Compliance Checklist. A copy of the FEMA Flood Insurance Rate Map showing the site location is included in Appendix A.

### 2.7 Surface Features/Wetland Fill/Construction Activity

Under the Clean Water Act (40 CFR § 230.3), wetlands are defined as “those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs and similar areas.” Potential wetlands under the jurisdiction of the United States Army Corps of Engineers (ACOE) include waterways, lakes, streams, and natural springs.

Terracon’s review of the USFWS National Wetlands Inventory map available online at the National Wetlands Inventory website (<http://www.fws.gov/wetlands/>) indicated that wetlands are not located on the site. A copy of the NWI Map is included in Appendix A. As shown on the relevant USGS 7.5-minute topographic map, the site is not located adjacent to surface waters. This site is currently developed as a parking lot with no evidence of potential wetlands, hydric soils or hydrophytic vegetation at the site or along the proposed access. Furthermore, a review of the soil survey map on the National Resource Conservation Service website (<http://nracs.usda.gov>) indicated that soils on the site are in the Cancienne Series silty clay loam, which are not listed as indicative of hydric conditions. A cursory review of the proposed site plans and other information provided by the Daley Tower Service, Inc., indicates that significant grade changes will not be required based on the nature of the proposed construction. Based on the findings of this review, “No Adverse Impact” was marked for Item 7 on the NEPA Land Use Compliance Checklist.

## **2.8 High Intensity White Lights**

In accordance with the guidance document “F.A.A. Standard for Obstruction Marking and Lighting”, and based on standard practices, Terracon assumes high-intensity white lights will not be used because this tower is less than 499 feet above ground level,. Based on this information, no further evaluation is required for this item and “No Adverse Impact” was marked for Item 8 on the NEPA Land Use Compliance Checklist.

## **2.9 Radio Frequency Radiation**

The FCC requires that certain communications services and devices undergo an environmental evaluation to assess compliance with radio frequency (RF) radiation exposure limits. Once the proposed telecommunication tower and associated antennas are constructed, Terracon anticipates that the monitoring of RF exposure radiation limits will be the responsibility of the carrier.

## **3.0 CONCLUSIONS**

Based on the review of readily available published lists, files, and maps regarding FCC issues, the proposed Daley Tower Service, Inc., St. James Parish Emergency Communications Tower site 62789, TCNS ID No. 74392, located at 5800 Highway 44 in Convent, Louisiana will not adversely impact the FCC special interest items outlined in 47 CFR 1.1307 (a) (1) through (8). Thus, the preparation of an Environmental Assessment (EA) is not warranted at this time.

The findings of this NEPA Land Use Compliance Report and Checklist are based on the project location, project type, and construction diagrams provided by Daley Tower Service, Inc. Should the project location, project type, and/or construction diagrams be altered, re-evaluation of the undertaking and re-submittal of the Section 7 and Section 106 Consultation packages may be required. Our office should be contacted to evaluate whether additional consultation is required in light of the project change. The findings and opinions presented are relative to the dates of our site work and should not be relied on to represent conditions at any later date. The opinions included herein are based on information obtained during this study and our experience. If additional information becomes available which might impact our environmental findings, we request the opportunity to review the information, reassess the potential concerns, and modify our opinions, as necessary. Although this evaluation has attempted to identify the potential for FCC NEPA impacts to the subject property, only the agencies identified in the report were contacted regarding site-specific information.

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### **4.0 GENERAL COMMENTS**

Our professional services have been performed using the standard of care and skill ordinarily exercised, under similar conditions, by reputable environmental compliance consultants/analysts practicing in the same or similar localities under same or similar circumstances. No other warranty, expressed or implied, is made as to the information in this report.

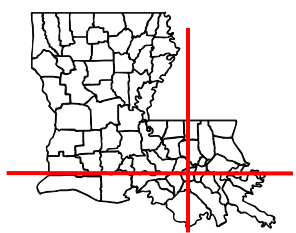
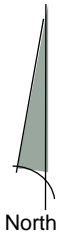
This report is intended for the use of Daley Tower Service, Inc. only. Our services have been performed under mutually agreed-upon terms and conditions. If other parties wish to rely on this report, please have them contact us so that a mutual understanding and agreement of the terms and conditions for our services can be established prior to their use of this information, provided Daley Tower Service, Inc. issues prior express, written approval.

## FIGURES



APPROXIMATE  
SITE LOCATION

1-MILE AREA OF  
POTENTIAL  
EFFECT



<b>SITE VICINITY MAP</b>	
St. James Emergency Tower Convent, Louisiana	
7.5-Minute Topographic Maps Lagan and Convent, Louisiana	
<b>Terracon</b>	Fig No. 1



## **APPENDIX A**

### **MAPS**

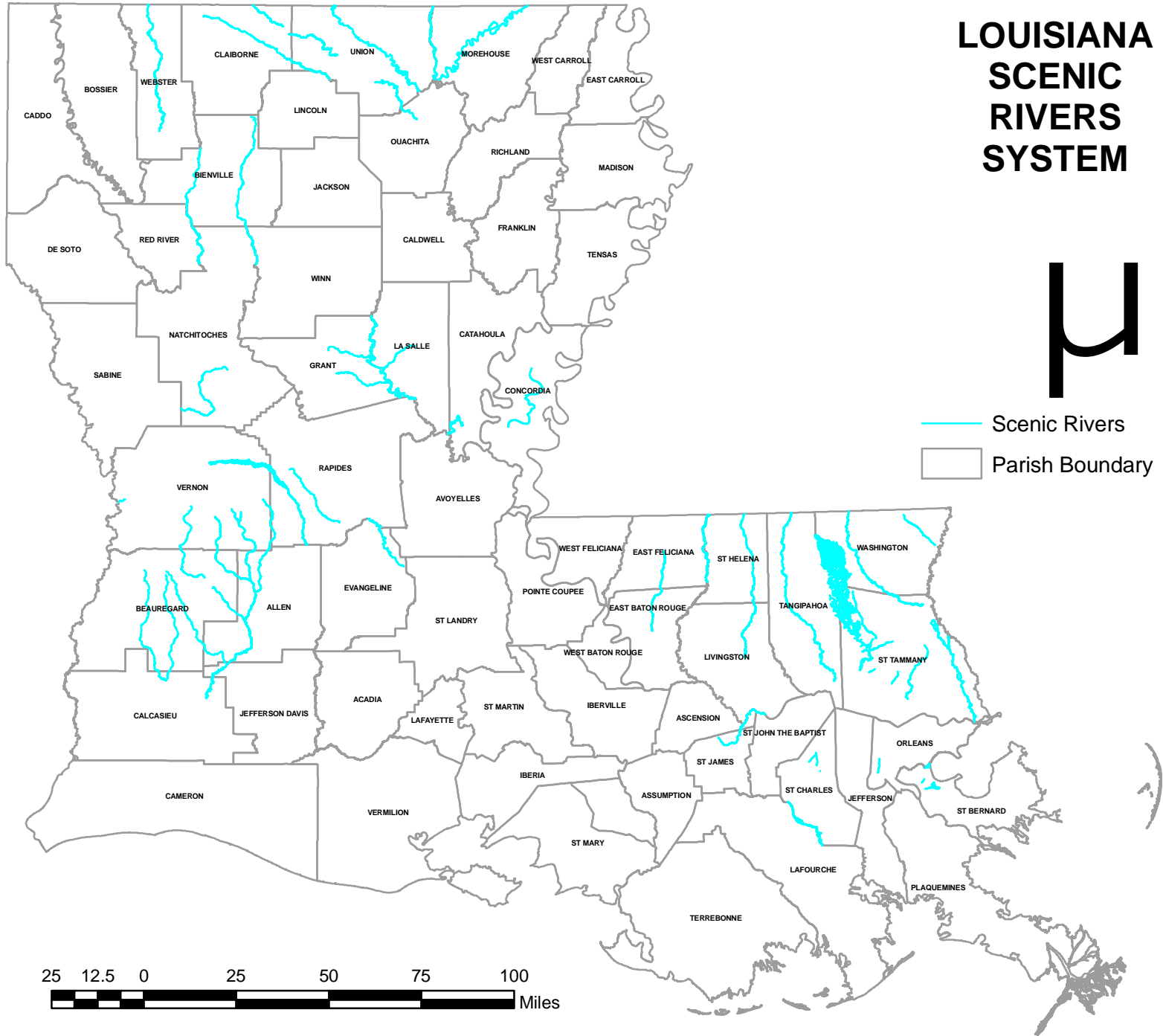
# Critical Habitat EH117034

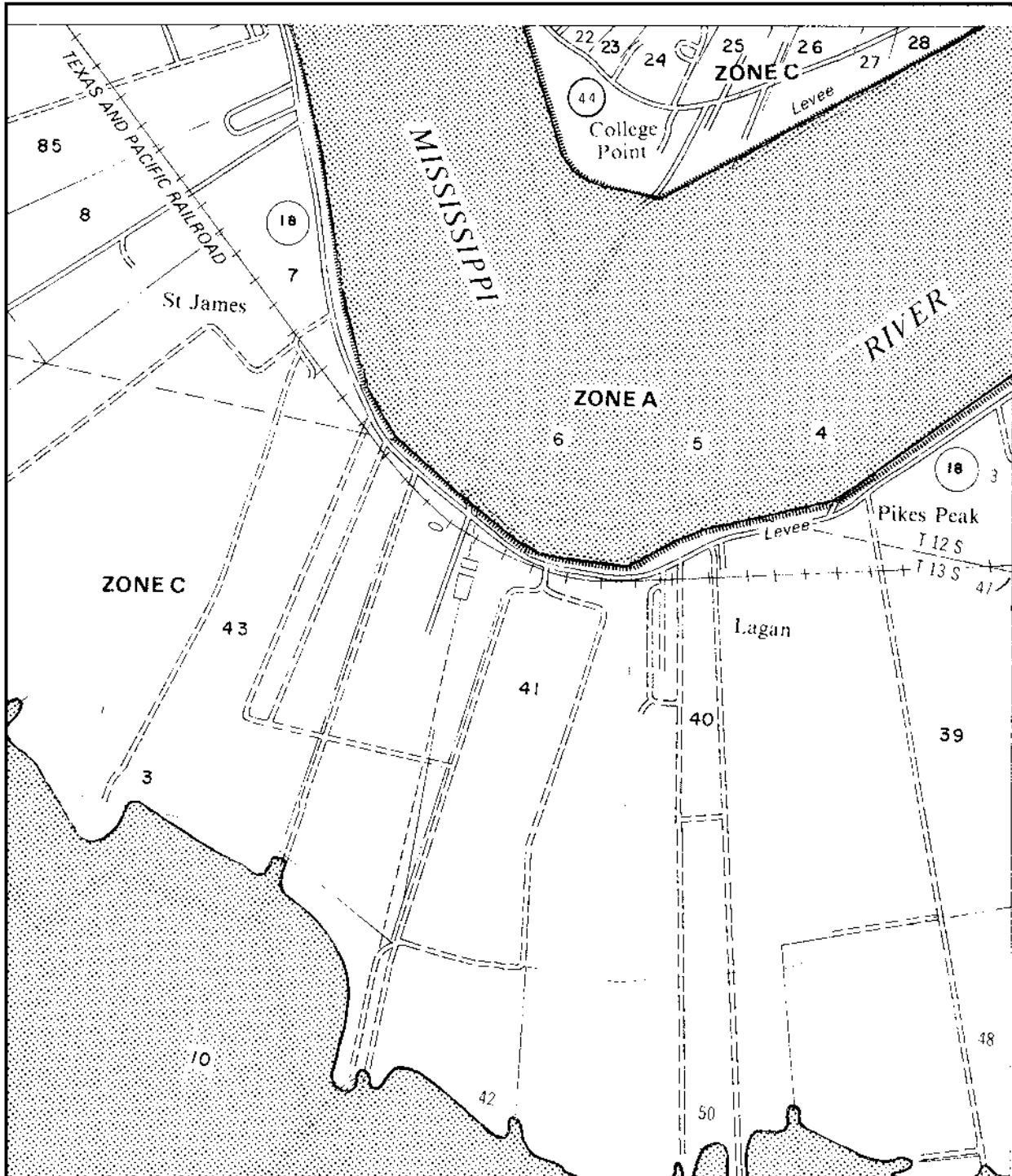
Powered by ArcGIS Server



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# LOUISIANA SCENIC RIVERS SYSTEM





APPROXIMATE SCALE  
 2000 0 2000 FEET

NATIONAL FLOOD INSURANCE PROGRAM

**FIRM**  
 FLOOD INSURANCE RATE MAP

**ST. JAMES  
 PARISH,  
 LOUISIANA**  
 UNINCORPORATED AREA

PANEL 75 OF 100  
 (SEE MAP INDEX FOR PANELS NOT PRINTED)

COMMUNITY-PANEL NUMBER  
 220261 0075 B

EFFECTIVE DATE:  
 JULY 13, 1982



Federal Emergency Management Agency

This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at [www.msc.fema.gov](http://www.msc.fema.gov)



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

EH117034 NWI

Mar 4, 2011



## Wetlands

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

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

User Remarks:

## **APPENDIX B**

### **CORRESPONDENCE**



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
646 Cajundome Blvd.  
Suite 400  
Lafayette, Louisiana 70506



March 24, 2011

Ms. Jessica R. Keasler  
Environmental Scientist  
Terracon Consultants, Inc.  
2822-B O'Neal Lane  
Baton Rouge, Louisiana 70816

Dear Ms. Keasler:

Please reference your March 3, 2011 letter (received in this office on March 7, 2011) requesting our review of St. James Parish's proposed installation of a communications tower at the St. James Parish Emergency Communications Center in the City of Convent, St. James Parish, Louisiana. The U.S. Fish and Wildlife Service (Service) has reviewed the information you provided, and offers the following comments in accordance with provisions of the Endangered Species Act (ESA) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and the Migratory Bird Treaty Act (MBTA) (40 Stat. 755, as amended; 16 U.S.C. 703 et seq.).

Our records indicate that no federally listed threatened or endangered species or their critical habitats, wilderness area or wildlife preserve presently occur within or near the proposed facility.

Because of the height (i.e., 400 feet), the proposed tower could potentially impact migratory birds, which are a Federal trust resource that the Service is authorized to protect. The Service is concerned that the number and distribution of existing towers, those currently authorized for construction, as well as the projected future increase of such towers could potentially impact neotropical migratory birds. Many neotropical migratory bird populations have been declining over the past 30 years, and the presence of communications towers in migration corridors may exacerbate those declines via increased bird mortality. Communication towers, especially those with lights and guy wires, are known to cause collision-related mortality in nocturnally migrating landbirds, especially during bad weather (e.g., fog and storm fronts). In some cases, the Federal Communications Commission has required tower licensees to consider impacts on migratory birds by placing conditions on the license to include such mitigative measures as marking the tower and guy wires with appropriate warning balls and streamers, and/or installing beacon or strobe lights designed to reduce attraction of birds.

The Service is working to develop a comprehensive approach to this issue. Because the reliability of bird-mortality data is relatively poor and anecdotal, research is still needed to document and quantify the impact of various types and sizes of towers on migratory

**TAKE PRIDE<sup>®</sup>  
IN AMERICA** 

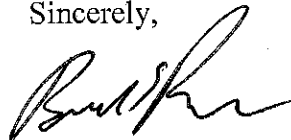
birds. Research is also needed to identify appropriate tower designs and operational programs that would help to avoid or minimize the potential for bird/tower collisions. We encourage the participation of the communications industry in developing a research program to identify appropriate tower designs and other effective ways to mitigate tower impacts to migratory birds.

We have identified the following preliminary risk criteria to assist you in planning tower locations and designs. On a priority scale, relatively low-risk locations for communication towers would include urban and suburban areas; potential impacts to migratory birds would progressively increase in rural areas, especially wetlands, prairie grasslands, coastal cheniers, barrier islands, and forests. If habitat issues do not preclude use of a proposed site, the Service recommends that new towers be less than 200 feet tall, without guy wires or lights, because such towers are associated with a lower risk of bird mortality. Where practicable, taller towers, with or without guy wires and/or lights, should be located out of sensitive habitats to reduce the likelihood for bird collisions. The Service also strongly supports the co-location of antennas from multiple communication sources on the same tower.

The MBTA prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the U.S. Department of the Interior. While the Act has no provision for allowing unauthorized take, the Service realizes that some birds may be harmed or killed as a result of collision with tower structures even when reasonable measures to protect birds are implemented. The Service's Office of Law Enforcement (LE) carries out its mission to protect migratory birds through investigations and enforcement, as well as by fostering relationships with individuals, companies, and industries that have taken effective steps to minimize their impacts on migratory birds, and by encouraging others to enact such programs. As such, LE focuses their resources on investigating and prosecuting individuals and companies that take migratory birds without regard for their actions or without effort to implement Service recommendations/conservation measures.

Thank you for the opportunity to comment on the proposed project during its initial planning stages. Please contact Rob Smith of this office (337/291-3134) regarding our comments.

Sincerely,



Brad S. Rieck  
Deputy Supervisor  
Louisiana Ecological Services Office





March 3, 2011

State of Louisiana Department of Culture, Recreation, and Tourism  
Office of Cultural Development  
P.O. Box 44247  
Baton Rouge, Louisiana 70804-4247

Attention: State Historic Preservation Officer  
[Section106@crt.state.la.us](mailto:Section106@crt.state.la.us)

Re: Cultural and Historical Sensitivity of the Property  
(Section 106 Environmental Review)  
Proposed Communications Tower  
St. James Parish Emergency Communications Center  
5800 Highway 44  
Convent, St. James Parish, Louisiana  
Project No. EH117034

No known historic properties will be affected by this undertaking. This effect determination could change should new information come to our attention.  
*Pam Breaux* 4-12-11  
Pam Breaux Date  
State Historic Preservation Officer

Dear SHPO:

Terracon was contracted to provide environmental clearance of the proposed Communications Tower to be located within adjacent to an existing tower at the St. James Parish Emergency Communications Center at 5800 Highway 44 in Convent, St. James Parish, Louisiana. St. James Parish has received FEMA funds for the development of this tower. A map showing the approximate location of the Site is provided as an attachment to this correspondence.

Terracon requests that the following statements be confirmed with regard to the indicated subject site and the area within one mile of the site.

- The property is not listed on or eligible for listing on the National Register of Historic Places.
- The property is not located within or directly adjacent to a historic district.
- The property's area of potential effects does not include a historic district or property.
- The property is not located within or directly adjacent to a known archaeological area.

Terracon appreciates your assistance in this matter. If there are questions or if additional information is needed, please contact me at 225-344-6052 or by e-mail at [jrkeasler@terracon.com](mailto:jrkeasler@terracon.com).

Sincerely,  
**Terracon Consultants, Inc.**

*Jessica R. Keasler*  
Jessica R. Keasler, MS  
Environmental Scientist



Terracon Consultants, Inc. 2822-B O'Neal Lane Baton Rouge, Louisiana 70816  
P [225] 344 6052 F [225] 344 6346 [terracon.com](http://terracon.com)



**FEDERAL COMMUNICATIONS COMMISSION**  
**Wireless Telecommunications Bureau**  
**1270 Fairfield Road**  
**Gettysburg, PA 17325-7245**

**NOTICE OF ORGANIZATION(S) WHICH WERE SENT  
PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION**

DALEY TOWER SERVICE, INC.  
DAVID COMEAUX  
1223 W. GLORIA SWITCH ROAD  
CARENCRO, LA 70520

Date: 03/11/2011  
Reference Number:

Dear Sir or Madam:

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this electronic mail message is to inform you that the following authorized persons were sent the information you provided through TCNS, which relates to your proposed antenna structure. The information was forwarded by the FCC to authorized TCNS users by electronic mail and/or regular mail (letter).

Persons who have received the information that you provided include leaders or their designees of federally-recognized American Indian Tribes, including Alaska Native Villages (collectively "Tribes"), Native Hawaiian Organizations (NHOs), and State Historic Preservation Officers (SHPOs). For your convenience in identifying the referenced Tribes and in making further contacts, the City and State of the Seat of Government for each Tribe and NHO, as well as the designated contact person, is included in the listing below. We note that Tribes may have Section 106 cultural interests in ancestral homelands or other locations that are far removed from their current Seat of Government. Pursuant to the Commission's rules as set forth in the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA), all Tribes and NHOs listed below must be afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below, unless the proposed construction falls within an exclusion designated by the Tribe or NHO. (NPA, Section IV.F.4).

The information you provided was forwarded to the following Tribes and NHOs who have set their geographic preferences on TCNS. If the information you provided relates to a proposed antenna structure in the State of Alaska, the following list also includes Tribes located in the State of Alaska that have not specified their geographic preferences. For these Tribes and NHOs, if the Tribe or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribe or NHO has agreed to different procedures (NPA, Section IV.F.5). In the event such a Tribe or NHO does not respond to a follow-up inquiry, or if a substantive or procedural disagreement arises between you and a Tribe or NHO, you must seek guidance from the Commission (NPA, Section IV.G). These procedures are further set forth in the FCC's Declaratory Ruling released on October 6, 2005 (FCC 05-176).

1. Historic Preservation Officer - Bryant Celestine - Alabama-Coushatta Tribe of Texas - Livingston, TX - electronic mail

Details: Please consider this notification as our interest for consultation regarding your proposal. The Alabama-Coushatta Tribe of Texas requests an administrative fee of \$300.00 for our services including internal file searches, elder consultations, and if necessary, travel expenses for a site visit to complete our determination regarding your proposal. TAKE NOTE of the following procedures as this will assist our efforts to provide your firm with the most efficient process in returning our determinations:

1. Submit your Form 620 or 621 by email to celestine.bryant@actribe.org. Each submission is logged and within 10 days of receipt, an invoice will be returned to the email account we receive your supplemental information. IF YOU HAVE NOT RECEIVED THIS BY 15DAYS, PLEASE INQUIRE.
2. INCLUDE your invoice number on your payment and submit according to the Invoice instructions. We cannot track your payment by project number so please do not submit without an invoice number.
3. Within 20 days of your original submission, you will receive an email response from our Office relating to our determinations for your proposal. This may occur despite a delay in fee payment. If you have not received our determination within 25 days, PLEASE INQUIRE.
4. IN THE EVENT OF AN OUTSTANDING BALANCE, a detailed invoice will be submitted in place of our determination. In this manner, your Section 106 obligations without Tribe ARE NOT complete until we have forwarded our written response indicating our determination.
5. If the applicant/tower builder decides to withdraw a proposal, please advise our office as soon as possible to avoid an outstanding balance in the future and any unnecessary research by our office.

Thank you, Bryant J. Celestine - Historic Preservation Officer

2. Director of Information Technology - Christopher Sylestine - Coushatta Indian Tribe - Elton, LA - regular mail

3. Cultural Director - Kimberly Walden - Chitimacha Tribe of Louisiana - Charenton, LA - electronic mail and regular mail

Details: If the Applicant/tower builder receives no response from the Chitimacha Tribe of Louisiana within 30 days after notification through TCNS, the Chitimcha Tribe of Louisiana has no interest in participating in pre-construction review for the site. The Applicant/tower builder, however, must immediately notify the Chitimacha Tribe of Louisiana in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

4. THPO - Kenneth Carleton - Mississippi Band of Choctaw Indians - Choctaw, MS - electronic mail

Details: Please send all information via e-mail (and only via e-mail - no paper copies please) to: choctawhp@gmail.com (9 meg attachment limit)

The Mississippi Band of Choctaw Indians wishes to see full information packets for all towers within the designated areas for consultation.

Form 620, if it includes the a full text of the cultural resource survey with maps, is adequate for our needs. If your 620 does not include the text of the cultural resource survey, then attach it seperately.

Please include the tower identification (TCNS#, name, and any other information that may help us identify this site) and the county and state where the facility is proposed in the subject line.

If the applicant/tower builder receives no response from the Mississippi Band of Choctaw Indians within 30 days AFTER YOU HAVE E-MAILED THE AFOREMENTIONED INFORMATION TO US (begin counting the 30 day period AFTER the e-mail with all of the information has been sent), then the Mississippi Band of Choctaw Indians has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Mississippi Band of Choctaw Indians in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

5. Director of Cultural Resources & THPO - Terry Cole - Choctaw Nation of Oklahoma - Durant, OK - electronic mail and regular mail

Details: The Applicant may conclude that the Choctaw Nation of Oklahoma has no interest in a site if there is existing disturbance wherein the depth of the previous disturbance exceeds the proposed construction depth (excluding footing and other anchoring mechanisms) by at least 2 feet (Applying VI - D(2)(c)(i) of the Nationwide Programmatic Agreement concerning Field Surveys; 'In the Matter of Nationwide Programmatic Agreement Regarding the Section 106 National Historic Preservation Act Review Process,' Report and Order, 20 FCC Rcd. 1073, WT Docket No. 03-128, October 5, 2004).

Furthermore, the Choctaw Nation of Oklahoma does not have an interest in a Tower that will be constructed on an existing structure, developed land, or within city limits. However, any of the above mentioned criteria should be communicated to us if not evident in the initial Notification Details. For all other towers, we request a signed field survey report that meets the Federal guidelines set forth by the Department of the Interior and a site location map along with pictures for each project.

Additionally, the Choctaw Nation of Oklahoma has informed FCC Staff that if the Applicant does not receive a response from the Tribe within 30 days of a TCNS notification, then the Applicant SHOULD MAKE A GOOD FAITH EFFORT WITH A FOLLOW-UP PHONE CALL to make sure that the tribe is aware of the proposed tower project. However, should construction expose buried archaeological or building materials such as chipped stone, tools, pottery, bone, historical crockery, glass or metal items, this office should be contacted immediately @ 1-800-522-6170 ext. 2137. [n.b. Please reference the TCNS number in all communications that follow the initial notification.]

6. MEKKO and Acting Tribal Administrator - Jennie Lillard - Kialegee Tribal Town - Wetumka, OK - regular mail

Details: If the Applicant receives no response from the Kialegee Tribal Town within 30 days after notification through TCNS, the Kialegee Tribal Town has no interest in participating in pre-construction review for the site. The Applicant, however, must immediately notify the Kialegee Tribal Town in the event archaeological properties or human remains are discovered during construction.

7. Historic Preservation Officer - Seminole Nation - Seminole Nation of Oklahoma - Wewoka, OK - electronic mail  
Details: If the Applicant/tower builder receives no response from the Seminole Nation of Oklahoma within 30 days after notification through TCNS, the Seminole Nation of Oklahoma has no interest in participating in pre-construction review for the site. The Applicant/tower builder, however, must IMMEDIATELY notify the Seminole Nation of Oklahoma in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

8. THPO - Earl Barbry - Tunica-Biloxi Indians of Louisiana - Marksville, LA - regular mail

The information you provided was also forwarded to the additional Tribes and NHOs listed below. These Tribes and NHOs have NOT set their geographic preferences on TCNS, and therefore they are currently receiving tower notifications for the entire United States. For these Tribes and NHOs, you are required to use reasonable and good faith efforts to determine if the Tribe or NHO may attach religious and cultural significance to historic properties that may be affected by its proposed undertaking. Such efforts may include, but are not limited to, seeking information from the relevant SHPO or THPO, Indian Tribes, state agencies, the U.S. Bureau of Indian Affairs, or, where applicable, any federal agency with land holdings within the state (NPA, Section IV.B). If after such reasonable and good faith efforts, you determine that a Tribe or NHO may attach religious and cultural significance to historic properties in the area and the Tribe or NHO does not respond to TCNS notification within a reasonable time, you should make a reasonable effort to follow up, and must seek guidance from the Commission in the event of continued non-response or in the event of a procedural or substantive disagreement. If you determine that the Tribe or NHO is unlikely to attach religious and cultural significance to historic properties within the area, you do not need to take further action unless the Tribe or NHO indicates an interest in the proposed construction or other evidence of potential interest comes to your attention.

None

The information you provided was also forwarded to the following SHPOs in the State in which you propose to construct and neighboring States. The information was provided to these SHPOs as a courtesy for their information and planning. You need make no effort at this time to follow up with any SHPO that does not respond to this notification. Prior to construction, you must provide the SHPO of the State in which you propose to construct (or the Tribal Historic Preservation Officer, if the project will be located on certain Tribal lands), with a Submission Packet pursuant to Section VII.A of the NPA.

9. SHPO - Cathie Matthews - Department of Arkansas Heritage - Little Rock, AR - electronic mail

10. Deputy SHPO - Ken Grunewald - Department of Arkansas Heritage - Little Rock, AR - electronic mail

11. SHPO - Pam Breaux - Dept. of Culture, Recreation & Tourism - Baton Rouge, LA - regular mail

Letter to *Daley Tower Service, Inc. Jessica Keasler*

Date:03/11/2011

Page 5

12. Deputy SHPO - Phil Boggan - Louisiana - Division of Historic Preservation - Baton Rouge, LA - electronic mail and regular mail

13. SHPO - Elbert Hilliard - Mississippi Dept of Archives & History - Jackson, MS - regular mail

14. Deputy SHPO - Kenneth P'Pool - Division of Historic Preservation - Jackson, MS - electronic mail

If you are proposing to construct a facility in the State of Alaska, you should contact Commission staff for guidance regarding your obligations in the event that Tribes do not respond to this notification within a reasonable time.

Please be advised that the FCC cannot guarantee that the contact(s) listed above opened and reviewed an electronic or regular mail notification. The following information relating to the proposed tower was forwarded to the person(s) listed above:

Notification Received: 03/03/2011

Notification ID: 74392

Tower Owner Individual or Entity Name: Daley Tower Service, Inc.

Consultant Name: Jessica Keasler

P.O. Box:

Street Address: 1223 W. Gloria Switch Road

City: Carencro

State: LA

Zip Code: 70520

Phone: 225-344-6052

Email: jrkeasler@terracon.com

Structure Type: UTOWER - Unguyed - Free Standing Tower

Latitude: 29 deg 59 min 41.9 sec N

Longitude: 90 deg 49 min 2.7 sec W

Location Description: 5800 Highway 44

City: Convent

State: LOUISIANA

County: ST. JAMES

Ground Elevation: 6.1 meters

Support Structure: 121.9 meters above ground level

Overall Structure: 128.0 meters above ground level

Overall Height AMSL: 134.1 meters above sea level

If you have any questions or comments regarding this notice, please contact the FCC using the electronic mail form located on the FCC's website at:

<http://wireless.fcc.gov/outreach/notification/contact-fcc.html>.

Letter to *Daley Tower Service, Inc. Jessica Keasler*

Date:03/11/2011

Page 6

You may also call the FCC Support Center at (877) 480-3201 (TTY 717-338-2824). To provide quality service and ensure security, all telephone calls are recorded.

Thank you,  
Federal Communications Commission

Reference Copy

**From:** Kiehn, Adam V  
**To:** ["celestine.bryant@actribe.org"](mailto:celestine.bryant@actribe.org)  
**Cc:** [Keasler, Jessica R.](#)  
**Subject:** Proposed Communications Tower (TCNS ID 74392)  
**Date:** Monday, April 04, 2011 4:09:00 PM  
**Attachments:** [St. James Tower location 2.jpg](#)  
[Figure1-halfmile.pdf](#)

---

Dear Mr. Bryant:

Terracon was contracted to provide environmental clearance of the proposed Communications Tower to be located within adjacent to an existing tower at the St. James Parish Emergency Communications Center at 5800 Highway 44 in Convent, St. James Parish, Louisiana. St. James Parish has received FEMA funds for the development of this tower. A map showing the approximate location of the Site is provided as an attachment to this correspondence. The location is currently developed with a parking lot adjacent to an existing tower. This message is a follow-up to the FCC Tower Construction Notification System correspondence (TCNS ID 74392).

As part of the FCC/NEPA process it is required that a determination of possible effects to Indian religious sites be performed. Terracon requests that the following statements be confirmed with regard to the indicated subject site and the area within one mile of the site.

- The facility will not affect Indian Religious Sites.

Terracon respectfully requests written confirmation of this statement as soon as possible. Please feel free to fax written confirmation to our office at 225-344-6346 or by E-mail or regular mail at the addresses included herein.

Terracon appreciates your assistance in this matter. If there are questions or if additional information is needed, please contact me or Jessica Keasler at the address found below.

Sincerely,

**Adam Kiehn**  
**Staff Geologist**

**Terracon**

2822-B O'Neal Lane I Baton Rouge, Louisiana 70816  
P [225] 344 6052 I F [225] 344 6346 I M [706] 206 5147  
[avkiehn@terracon.com](mailto:avkiehn@terracon.com) | [terracon.com](http://terracon.com)





April 4, 2011

Coushatta Tribe of Louisiana  
Tribal Historic Preservation Office  
1940 CC Bel Road  
Kinder, Louisiana 70648

Attention: Director of Information Technology  
Mr. Christopher Sylestine

Re: Indian Religious Sites, State of Louisiana  
Proposed Communications Tower (TCNS ID 74392)  
St. James Parish Emergency Communications Center  
5800 Highway 44  
Convent, St. James Parish, Louisiana  
Project No. EH117034

Dear Mr. Sylestine:

Terracon was contracted to provide environmental clearance of the proposed Communications Tower to be located within adjacent to an existing tower at the St. James Parish Emergency Communications Center at 5800 Highway 44 in Convent, St. James Parish, Louisiana. St. James Parish has received FEMA funds for the development of this tower. A map showing the approximate location of the Site is provided as an attachment to this correspondence.


As part of the FCC/NEPA process it is required that a determination of possible effects to Indian religious sites be performed. Terracon requests that the following statements be confirmed with regard to the indicated subject site and the area within one mile of the site.

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Terracon appreciates your assistance in this matter. If there are questions or if additional information is needed, please contact me at 225-344-6052 or by e-mail at [jrkeasler@terracon.com](mailto:jrkeasler@terracon.com).

Sincerely,  
**Terracon Consultants, Inc.**

  
Jessica R. Keasler, MS  
Environmental Scientist



Terracon Consultants, Inc. 2822-B O'Neal Lane Baton Rouge, Louisiana 70816  
P [225] 344 6052 F [225] 344 6346 [terracon.com](http://terracon.com)

Geotechnical



Environmental



Construction Materials



Facilities

**From:** Kiehn, Adam V  
**To:** ["choctawhp@gmail.com"](mailto:choctawhp@gmail.com)  
**Cc:** [Keasler, Jessica R.](#)  
**Subject:** Proposed Communications Tower (TCNS ID 74392) St. James Parish, Louisiana  
**Date:** Monday, April 04, 2011 4:13:00 PM  
**Attachments:** [Figure1-halfmile.pdf](#)  
[St. James Tower location 2.jpg](#)

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Dear Mr. Carleton:

Terracon was contracted to provide environmental clearance of the proposed Communications Tower to be located within adjacent to an existing tower at the St. James Parish Emergency Communications Center at 5800 Highway 44 in Convent, St. James Parish, Louisiana. St. James Parish has received FEMA funds for the development of this tower. A map showing the approximate location of the Site is provided as an attachment to this correspondence. The location is currently developed with a parking lot adjacent to an existing tower. This message is a follow-up to the FCC Tower Construction Notification System correspondence (TCNS ID 74392).

As part of the FCC/NEPA process it is required that a determination of possible effects to Indian religious sites be performed. Terracon requests that the following statements be confirmed with regard to the indicated subject site and the area within one mile of the site.

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Terracon appreciates your assistance in this matter. If there are questions or if additional information is needed, please contact me or Jessica Keasler at the address found below.

Sincerely,

**Adam Kiehn**  
**Staff Geologist**

**Terracon**

2822-B O'Neal Lane I Baton Rouge, Louisiana 70816  
P [225] 344 6052 I F [225] 344 6346 I M [706] 206 5147  
[avkiehn@terracon.com](mailto:avkiehn@terracon.com) | [terracon.com](http://terracon.com)

**From:** Kiehn, Adam V  
**To:** ["cjohnson@choctawnation.com"](mailto:cjohnson@choctawnation.com)  
**Cc:** [Keasler, Jessica R.](#)  
**Subject:** Proposed Communications Tower (TCNS ID 74392)  
**Date:** Monday, April 04, 2011 4:08:00 PM  
**Attachments:** [Figure1-halfmile.pdf](#)  
[St. James Tower location 2.jpg](#)

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Dear Ms. Johnson:

Terracon was contracted to provide environmental clearance of the proposed Communications Tower to be located within adjacent to an existing tower at the St. James Parish Emergency Communications Center at 5800 Highway 44 in Convent, St. James Parish, Louisiana. St. James Parish has received FEMA funds for the development of this tower. A map showing the approximate location of the Site is provided as an attachment to this correspondence. The location is currently developed with a parking lot adjacent to an existing tower. This message is a follow-up to the FCC Tower Construction Notification System correspondence (TCNS ID 74392).

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Sincerely,

**Adam Kiehn**  
**Staff Geologist**

**Terracon**

2822-B O'Neal Lane I Baton Rouge, Louisiana 70816  
P [225] 344 6052 I F [225] 344 6346 I M [706] 206 5147  
[avkiehn@terracon.com](mailto:avkiehn@terracon.com) | [terracon.com](http://terracon.com)



April 4, 2011

Tunica-Biloxi Tribe of Louisiana  
Tribal Historic Preservation Office  
151 Melacon Drive  
Marksville, Louisiana 71351

Attention: Director of Information Technology  
Mr. Earl Barbry

Re: Indian Religious Sites, State of Louisiana  
Proposed Communications Tower (TCNS ID 74392)  
St. James Parish Emergency Communications Center  
5800 Highway 44  
Convent, St. James Parish, Louisiana  
Project No. EH117034

Dear Mr. Barbry:

Terracon was contracted to provide environmental clearance of the proposed Communications Tower to be located within adjacent to an existing tower at the St. James Parish Emergency Communications Center at 5800 Highway 44 in Convent, St. James Parish, Louisiana. St. James Parish has received FEMA funds for the development of this tower. A map showing the approximate location of the Site is provided as an attachment to this correspondence.


As part of the FCC/NEPA process it is required that a determination of possible effects to Indian religious sites be performed. Terracon requests that the following statements be confirmed with regard to the indicated subject site and the area within one mile of the site.

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Terracon appreciates your assistance in this matter. If there are questions or if additional information is needed, please contact me at 225-344-6052 or by e-mail at [jrkeasler@terracon.com](mailto:jrkeasler@terracon.com).

Sincerely,  
**Terracon Consultants, Inc.**

  
Jessica R. Keasler, MS  
Environmental Scientist



Terracon Consultants, Inc. 2822-B O'Neal Lane Baton Rouge, Louisiana 70816  
P [225] 344 6052 F [225] 344 6346 [terracon.com](http://terracon.com)

Geotechnical



Environmental



Construction Materials



Facilities

April 28, 2011

Alabama-Coushatta Tribe of Texas  
Tribal Historic Preservation Office  
571 State Park Road 56  
Livingston, Texas 77351

Attention: Mr. Bryant J. Celestine

Re: Section 106 Consultation for Proposed Communications Tower (TCNS ID 74392)  
St. James Parish Emergency Communications Center  
5800 Highway 44  
Convent, St. James Parish, Louisiana  
Project No. EH117034

Dear Mr. Celestine:

Terracon was contracted to provide a NEPA checklist clearance of the proposed Communications Tower to be located within adjacent to an existing tower at the St. James Parish Emergency Communications Center at 5800 Highway 44 in Convent, St. James Parish, Louisiana. St. James Parish has received FEMA funds for the development of this tower.

A Form 620, Invoice, and Check for Administrative Fee are attached to this letter. Also included are several maps and correspondence associated with the Form 620. The proposed tower will be adjacent to an existing tower within the parking lot of the St. James Parish government complex. No undeveloped areas will be directly affected during the proposed construction. The Louisiana Division of Archaeology map shows no known archaeological sites within the area of potential effect.

As part of the FCC/NEPA process it is required that a determination of possible effects to Indian religious sites be performed. Terracon requests that the following statements be confirmed with regard to the indicated subject site and the area within one mile of the site.

- The facility will not affect Indian Religious Sites.

Terracon respectfully requests written confirmation of this statement as soon as possible. Please feel free to fax written confirmation to our office at 225-344-6346 or by E-mail or regular mail at the addresses included herein.





Terracon appreciates your assistance in this matter. If there are questions or if additional information is needed, please contact me at 225-344-6052 or by e-mail at [jrkeasler@terracon.com](mailto:jrkeasler@terracon.com).

Sincerely,  
**Terracon Consultants, Inc.**

  
Jessica R. Keasler, MS  
Environmental Scientist

**From:** [Bryant J. Celestine](#)  
**To:** [Kiehn, Adam V](#)  
**Subject:** RE: Proposed Communications Tower (TCNS ID 74392)  
**Date:** Tuesday, May 03, 2011 2:30:56 PM

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Dear Mr. Kiehn:

On behalf of Mikko Oscola Clayton Sylestine and the Alabama-Coushatta Tribe, our appreciation is expressed on your efforts to consult us regarding TCNS #74392 in St. James Parish.

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

Upon review of your April 4, 2011 submission, no immediately known impacts to religious, cultural, or historical assets of the Alabama-Coushatta Tribe of Texas are anticipated in conjunction with this proposal. The proposed location does exist in direct proximity to migratory routes and habitation sites utilized by ancestral members of the Alabama and Coushatta Tribes.

Therefore, we request the immediate notification of the inadvertent discovery of human remains and/or archaeological artifacts as well as a cease of activity in proximity to the location until all formal consultations with appropriate authorities, including our office, are completed. Should you require further assistance, please do not hesitate to contact us.

Sincerely,

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

**From:** [towernotifyinfo@fcc.gov](mailto:towernotifyinfo@fcc.gov)  
**To:** [Keasler, Jessica R.](mailto:Keasler, Jessica R.)  
**Cc:** [kim.pristello@fcc.gov](mailto:kim.pristello@fcc.gov); [diane.dupert@fcc.gov](mailto:diane.dupert@fcc.gov)  
**Subject:** Confirmation - Referral of a Proposed Tower Construction Notification - Email ID #2782948  
**Date:** Tuesday, April 19, 2011 7:01:41 AM

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Dear David Comeaux,

Your referral of a proposed tower structure notification has been successfully submitted via the Tower Construction Notification System. The Federal Communications Commission (FCC) will be processing this referral for purposes of contacting federally recognized Indian Tribes, including Alaska Native Villages, and Native Hawaiian Organizations as specified by Section IV.G of the Nationwide Programmatic Agreement and the Declaratory Ruling of October 6, 2005. You will receive a Proposed Construction of Communications Facilities Notification of Final Contacts when the FCC has completed processing this referral. Below are the details you provided in the referral of the tower you have proposed to construct:

Notification Received: 03/03/2011  
Notification Referred: 04/19/2011

Notification ID: 74392  
Tower Owner Individual or Entity Name: Daley Tower Service, Inc.  
Consultant Name: Jessica Keasler  
Street Address: 1223 W. Gloria Switch Road  
City: Carencro  
State: LOUISIANA  
Zip Code: 70520  
Phone: 225-344-6052  
Email: [jrkeasler@terracon.com](mailto:jrkeasler@terracon.com)

Structure Type: UTOWER - Unguyed - Free Standing Tower  
Latitude: 29 deg 59 min 41.9 sec N  
Longitude: 90 deg 49 min 2.7 sec W  
Location Description: 5800 Highway 44  
City: Convent  
State: LOUISIANA  
County: ST. JAMES  
Ground Elevation: 6.1 meters  
Support Structure: 121.9 meters above ground level  
Overall Structure: 128.0 meters above ground level  
Overall Height AMSL: 134.1 meters above mean sea level

Entities Who Have Not Responded:

Coushatta Indian Tribe  
First Contact Date: 03/10/2011  
Second Contact Date: 4/4/2011  
Mississippi Band of Choctaw Indians  
First Contact Date: 03/10/2011  
Second Contact Date: 4/4/2011  
Choctaw Nation of Oklahoma  
First Contact Date: 03/10/2011  
Second Contact Date: 4/4/2011  
Tunica-Biloxi Indians of Louisiana  
First Contact Date: 03/10/2011  
Second Contact Date: 4/4/2011



\*\*Note that the FCC will assign a unique Notification ID number for a site where the initial contact was not made through TCNS. You will need to reference this Notification ID number when you update your project's Status with us.