

Appendix H
Social Impact Assessment

Social Impact Assessment

For the

Proposed Main Pass Energy Hub
Environmental Impact Statement

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Prepared for:
engineering-environmental Management, Inc. (e²M)

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1.0 Introduction

On February 27, 2004, Freeport-McMoRan Energy LLC (Applicant) submitted to the U.S. Coast Guard (USCG) and the Maritime Administration (MARAD) an application for a license and all Federal authorizations required to own, construct, and operate a deepwater port in the Gulf of Mexico (GOM) off the coast of Alabama and Louisiana. At the same time, the Applicant submitted certificates of public convenience and necessity for natural gas pipelines in interstate commerce with the Federal Energy Regulatory Commission (FERC). The Applicant's proposed facilities would consist of a Terminal to receive, store, regasify, and process liquefied natural gas (LNG) and pipelines to transport the gas to existing onshore and offshore natural gas pipeline distribution points. One pipeline would transport natural gas liquids (NGL) to a plant near Venice, Louisiana.

The USCG and MARAD are the responsible Federal agencies for preparation of an Environmental Impact Statement (EIS) as mandated by the National Environmental Policy Act of 1969 (NEPA). NEPA, in conjunction with Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (April 1995) directs agencies to address potential social, natural, and cultural impacts of their decisions and ensure meaningful involvement of the populations of affected communities consistent with the applicable statutes, rules, and regulations. This Social Impact Assessment (SIA) identifies potential impacts on the social, natural, and cultural environments from construction and operation of the proposed Main Pass Energy Hub™ (MPEH™) facilities. This SIA also provides a vehicle for meaningful public involvement in the NEPA process.

USCG and MARAD are responsible for processing license applications to own, construct, and operate deepwater ports. The U.S. Army Corps of Engineers (USACE), FERC, U.S. Environmental Protection Agency (USEPA), U.S. Department of the Interior Minerals Management Service (MMS), National Oceanic and Atmospheric Administration Fisheries (NOAA), and the U.S. Fish and Wildlife Service (USFWS), have joined USCG and MARAD as cooperating agencies in the preparation of an EIS. This SIA is a component of the federally mandated EIS.

During public scoping, some stakeholders raised questions about possible adverse impacts of the Proposed Action, insufficient notice of the public scoping meetings, and the distance to the meetings in Mobile, Alabama. This SIA was prepared to ensure that stakeholder's concerns were fully addressed in the EIS.

2.0 Scope and Objectives of the SIA

The onshore natural gas pipelines would be entirely within Mobile County, Alabama. Two of the three route alternatives would be entirely within Census Tract 73, block group three (see attachments). Situated within this geographic range are the South Mobile County, Alabama, communities of Coden and Bayou La Batre (Potentially Affected Communities). The scope of this SIA includes the identification, analysis, and evaluation of potential social impacts of the Proposed Action on the individuals and social groups within the Potentially Affected Communities. As the Potentially Affected Communities are situated along the coastal nexus of the proposed natural gas pipeline route alternatives and are dependent upon the marine environment, the scope of this document includes the systematic identification of social impacts associated with both the onshore and offshore components of the Proposed Action upon the Potentially Affected Communities.

The objectives of this SIA are to

1. Develop and provide to the USCG and MARAD an SIA sufficient to support licensing decisions.
2. Detail the factual basis of identified social impacts inherent to the Proposed Action within the Potentially Affected Communities.
3. Facilitate public involvement in the decisionmaking process concerning the Proposed Action.
4. Suggest mitigations and alternatives relative to identified social impacts inherent to the Proposed Action within the Potentially Affected Communities.
5. Aid the USCG, MARAD, and cooperating agencies in assessing the Proposed Action's compliance with NEPA.

3.0 Methodology and Development of the SIA

The methodology employed in the development of this SIA is based upon generally accepted standards within the field of anthropology. This SIA included the review of relevant documentation with independent field verification and analysis. Document review undertaken prior to fieldwork included information submitted to the agencies by the Applicant, applicable Federal resources, and acceptable local resources.

Fieldwork was undertaken in two trips to the Potentially Affected Communities during October and December 2004. The infield portion of the study consisted of interviews with a representative sample of stakeholders within the Potentially Affected Communities. Some interviews of stakeholders required the resources of a volunteer interpreter. These interviews serve the dual purposes of providing a vehicle for public involvement in the decisionmaking process and were a means of factual verification of potential social, environmental, and natural resource impacts of the Proposed Action on the Potentially Affected Communities. Professionals with expertise in relevant scientific fields were also interviewed to test the validity of statements of stakeholders, and for additional information pertaining to the areas of concern. Observations were also made relevant to the extant impacts of the natural gas industry in the Potentially Affected Communities.

The review of documentation and infield observations provided the basis for an analysis of baseline social conditions and demographics of the Potentially Affected Communities. This information also served as a contextual statement of the social/ethnographic status of the Potentially Affected Communities and as a formalization of findings of potential social impacts associated with the Proposed Action. The SIA considered not only direct impacts from the Proposed Action, but also cumulative effects from the construction of natural gas facilities within the geographic region of the Potentially Affected Communities.

4.0 Summary of Findings

The Potentially Affected Communities are comprised of individuals with low to modest income levels, and high percentages of minorities and ethnic groups. Education levels are consistent with traditional patterns found among low to modest income levels. The Potentially Affected Communities are dependent on the marine environment for income, subsistence, and recreation.

Seven natural gas facilities are presently situated within the Potentially Affected Communities. Pending Federal applications include the MPEH™ pipelines and those of the proposed Compass

Port LNG Terminal. The state of Alabama has leased adjacent coastal waters for further exploration of natural gas reserves.

Fieldwork conducted in the development of this SIA revealed that few local residents had been informed of or were aware of the Proposed Action, which is the subject of this SIA. There was a widespread sense among locals that the continuing geographic and cultural isolation of the affected communities, the lack of education and economic resources, and a substantial population of ethnic Asians resulted in the Potentially Affected Communities suffering disproportionate and adverse effects from the natural gas industry and the Federal permitting process, and that the Potentially Affected Communities have not had meaningful involvement in the decisionmaking process.

Based upon analysis of the Proposed Action upon the Potentially Affected Communities areas of concern were identified. These concerns are

1. Insufficient notice to residents of the Potentially Affected Communities.
2. Insufficient meaningful involvement in the agencies' decisionmaking processes.
3. Potential adverse impacts of Federal permitting of the natural gas industry upon the Potentially Affected communities, both singularly and cumulatively.
4. Cultural disruption of the residents of the affected communities.
5. Economic considerations.
6. Creation of adverse safety and health risks.
7. Destruction of natural and cultural resources.

5.0 Description of the Proposed Action and Alternatives

The Applicant proposes to construct the MPEHTM as a deepwater port to receive, regasify, condition (process), store, and transport LNG and constituent liquids derived from the conditioning process. This plan involves offloading of LNG combined with gas conditioning and storage of the regasified natural gas in newly created caverns leached out of undersea salt domes. The facility is designed to deliver an average of 1.0 billion standard cubic feet per day (bscfd) and a peak of 3 bscfd of pipeline-quality natural gas, and a peak of 85,000 barrels per day (bbls/day) of natural gas liquids. The proposed Terminal would be on the GOM approximately 16 miles (26 km) offshore, southeast of Louisiana at Main Pass Block 299 (MP 299) at a water depth of approximately 210 feet (64 meters). The proposed location is a former sulfur mining facility. The project would utilize four existing platforms, along with associated bridges and support structures. Two new platforms would be constructed to support LNG storage tanks. LNG would be transported via approximately 192 miles of new pipelines connecting the deepwater port with existing natural gas pipelines and an NGL plant in Venice, Louisiana.

Several routes were initially considered for the transmission of revaporized natural gas. Five proposed pipelines would connect the proposed Port with several existing gas distribution pipelines, one of which would connect with the interstate natural gas distribution network in Alabama. Although the Applicant identified a preferred natural gas pipeline route into Alabama, three route alternatives are being evaluated by the agencies in the EIS.

5.1 Bayou La Batre Route

Under this alternative, a 36-inch pipeline extending north from MP 164 would enter the Mississippi Sound along the eastern edge of the Bayou La Batre navigation channel, turn east just

north of Coffee Island, and make landfall at Coden, Alabama, through a horizontal directional drill (HDD) under the coastline. The pipeline would then progress onshore for 5.1 miles adjacent to the existing Gulfstream corridor to an ultimate interconnection with Gulfstream's Line 100 in Coden. The pipeline would have a capacity of 1.5 billion cubic feet per day (Bcf/D).

5.2 Portersville Bay Route

Under this alternative, a 36-inch pipeline extending north from MP 164 would enter the Mississippi Sound around the western tip of Dauphin Island, turn east along the south side of Coffee Island, and then turn north to join an existing pipeline corridor. Landfall would be through an HDD under the coastline at Coden, where it would interconnect with the Gulfstream pipeline corridor.

5.3 Mobile Interconnect Route

Under this alternative, a 36-inch pipeline extending north from MP 164 would enter the Mississippi Sound along the eastern edge of the Bayou La Batre navigation channel. This alternative would make landfall through an HDD under the coastline west of NOAA's laboratory. It would then progress onshore for approximately 5 miles to collocate with the existing Transco pipeline corridor. From this point the pipeline would follow the Transco right-of-way (ROW) north to Mobile, Alabama, for approximately 19.3 km (12 mi) to interconnect with the Gulf South and the Transco/Florida Gas pipelines. To connect to the Gulfstream distribution system, an additional pipeline would either need to follow the Transco ROW southeast to Coden, Alabama, connect offshore at an undetermined point, or follow another route such as the Portersville Bay or Bayou La Batre Channel alternatives to Coden, Alabama.

6.0 Application of Environmental Justice Criteria to the Potentially Affected Communities

Executive Order 12898 directs agencies to determine if a Federal action might have a disproportionately high adverse effect on minority or low-income populations. Further, should risk of disproportionate adverse impacts be indicated, agencies are directed to identify procedures to mitigate such adverse consequences.

Under NEPA, agencies are required to identify and analyze cumulative effects of a Proposed Action. Cumulative effects are impacts that result from the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (Title 40 Code of Federal Regulations (CFR) 1508.7).

The population of the Potentially Affected Communities is distinguished by a unique mixture of defining characteristics including culture, income, educational levels, continued geographic isolation, and ethnic composition. Data collection and research indicate that the Potentially Affected Communities should be evaluated for Environmental Justice concerns.

Local residents interviewed in the preparation of this SIA repeatedly stated their conviction that the continued development of a natural gas pipeline network in the area would result in a complex of cumulative adverse impacts on the longstanding lifestyle of the coastal region. Residents

expressed concerns for a sense of bias and discriminatory action on the part of the permitting agencies.

Information considered relevant to this SIA includes results of scoping meetings, baseline social conditions, demographics, ethnographic/historical review, and comments of stakeholders and professionals of relevant knowledge.

7.0 Scoping Meetings

Scoping meetings inviting public comment and preceding preparation of the EIS were held in Mobile, Alabama; Pascagoula, Mississippi; and New Orleans, Louisiana, on August 10, 11, and 12, 2004, respectively. The meetings were advertised in the Pascagoula *Mississippi Press* and *Mobile Register* on August 5, 2004, and in the New Orleans *Times-Picayune* on August 6, 2004. A Notice of Intent (NOI) to prepare an EIS was published in the *Federal Register* on July 29, 2004. An Interested Party Letter, the NOI, and a fact sheet describing the project were sent to approximately 230 state, Federal, and local agencies; and other potentially interested parties known to the agencies at that time.

Despite these announcements, residents of the Potentially Affected Communities were generally unaware that these meetings were held. Only one resident of the Potentially Affected Community of Coden, Collette King, who is employed in Mobile, Alabama, provided comments at the scoping meetings.

Discussions with local residents in the development of this SIA frequently revealed a sense of resentment of having been omitted from the referred-to scoping meetings. While everyone interviewed was concerned with the cumulative effect of multiple pipelines in the local area, many were unaware of the MPEHTM specifically until interviewed in the preparation of this SIA. Others who had known of the Proposed Action indicated that it was very unlikely that a meeting held in Mobile or the other more distant locations would be attended by local people due to economics and, more importantly, due to characteristics of the local residents which continue to set them apart economically, educationally, culturally, and psychologically from other populations. It was directly stated that people felt intimidated by the idea of attending a meeting in Mobile or the other locations where they felt meetings would be stacked in favor of the Proposed Action by powerful economic and political interests. When interviewed, residents of the Potentially Affected Communities expressed a high level of concern regarding the need for a vehicle whereby they could have notice of Proposed Actions and have input into the decisionmaking process.

8.0 Baseline Social Conditions

The affected region consists of the land mass in southwest Mobile County, Alabama, bordered by Portersville Bay. Incomes in this area are considered to be low to modest without a significant middle class. Many residents of the Potentially Affected Communities continue to be dependent upon the marine environment, as residents have for more than 200 years. The colonial population consisted of a mixture of French, African, and Native Americans. Social and racial lines tended to be and remain somewhat blurred as a consequence of this background. French traditions dominated the culture for more than two centuries and are still a strong defining characteristic, distinguishing this portion of the Alabama and Louisiana Gulf Coast from the remainder of the southeastern United States.

Hugh Lipscomb, Archbishop of the Diocese of Mobile, observed that as the metropolitan area of Mobile, Alabama, some 30 miles to the north of the GOM, became more cosmopolitan, the Potentially Affected Communities remained an outpost of French culture, isolated from this sociological and cultural influence (Lipscomb, pp. 40–42). Beginning in the 1970s the Catholic Church began a resettlement program that resulted in the development of a significant Asian population within the Potentially Affected Communities. At least 27.9 percent of the population of the Potentially Affected Community of Bayou La Batre claim origins from Southeast Asia (See Section 10, Demographics). As a consequence of this wave of ethnic immigration, there is a recent emergence of what locals term a “Creasian” culture resulting from the blending of the longstanding Creole and Cajun and recent Asian ethnicities

Within the Potentially Affected Communities residents rely predominantly on varied aspects of the fishing industry. Such aspects include exploitation of shrimp, oysters, crab, and many varieties of fish, as well as seafood processing industries and shipyard production. (Richardson 1965:622). In recent decades the combination of high diesel fuel prices and low-cost imported shrimp depressed the longstanding seafood industry that nevertheless remains the mainstay of the declining local economy. Residents also rely on the marine and natural environment for significant dietary contributions. Cultural and social activities of residents of the Potentially Affected Communities are often marine-based.

In the 1950s, with the discovery of offshore natural gas in the coastal waters of the region, revenues from the development of offshore oil field resources discoveries became an element in the economy of the state of Alabama. Positive economic influences of this industry on the local economy remain minimal.

Current baseline social conditions are indicative of a culturally and socially isolated population with a significantly depressed economy. The continuing reliance of this portion of the Alabama Gulf Coast on the tradition of marine-related occupations has resulted in a high level of school dropouts, with young people leaving school to take up work on ships, in shipyards, and in seafood processing, occupations which do not require extensive formal education (see Section 10, Demographics). The current population is a blend of French, African American, Native American, and Asian ethnicities.

9.0 History and Sociology/Ethnography of the Potentially Affected Communities

The following is a review of the history and sociology/ethnography of the Potentially Affected Communities. This review is mandated as the basis of an analysis for defining and evaluating the potential impacts of the Proposed Action on the Potentially Affected Communities and is not formulated to serve as a complete historical background.

9.1 Local History and Ethnography

Coden and Bayou La Batre, the two small coastal plain Alabama communities that are potentially affected by the Proposed Action are along Portersville Bay, which is an extension of the Mississippi Sound. The populations of both communities have in common a significant level of dependency on marine resources, rivers, tidal marshes, and bayous, as well as bottomland and upland forest resources of the area. This same pattern of marine dependency has been a longstanding traditional element of the culture of the region. Substantially similar patterns of resource exploitation were characteristic of the aboriginal Native American settlers of the area.

In an article titled *The Distinctive Character of a Bayou Community: Continuity and Change in Bayou La Batre from Prehistoric to Recent Times*, Dr. Diane E. Silvia documents the prehistory of the area. Numerous early Native American settlements in the area appear to have utilized a successful nomadic subsistence strategy that was only interrupted by the arrival of Europeans early in the 17th Century. Evidence of this reliance on marine and other aquatic resources is found in shell middens dating to 8,000 Before Present (B.P.). Throughout southeastern North America in the Late Woodland period, from 500 to 1000 A.D., as knowledge of wild plants increased and horticulture developed and evolved, a new subsistence strategy of cultivation was added to the long-standing practices of hunting and gathering of onshore and offshore resources as the basis for the local indigenous economy and settlement patterns. Archaeological evidence indicates that this general pattern of shifting resource exploitation was probably limited in the area of extreme southwest Alabama which is the study area of this SIA. In this region aquatic resources retained their longstanding importance as sources of food (Silvia, pp.50–51).

Evidence of this pattern of aquatic resource dependency is found in the many shell middens extant in the Potentially Affected Communities. These middens have as their major constituent oyster shells, but also contain tools, pottery, discarded bones, plant materials, and human remains. Area shell middens serve as a major source of information for archaeologists concerning the culture and subsistence patterns of precontact aboriginal Native Americans for southwest Alabama as well as other regions as distant as coastal California. The alkaline nature of shell middens provides an excellent environment for the long-time preservation of organic materials that would deteriorate in the more acidic soils prevalent throughout many areas of the South. A wide range of marine and marsh species remains are found in the shell middens of southwest Alabama indicating the varied resources exploited by the aboriginal inhabitants of the area. Several species of shellfish were important to local subsistence, including oysters (*Crassostrea virginica*) and marsh clams (*Polymesoda caroliniana* and *Rangia cuneata*). Other freshwater and marine species represented in shell middens of the area include blue shell crab, marine and freshwater catfish, drum, gar, mullet, sea trout, sheepshead, turtle, and alligator.

Even with the continued utilization of these aquatic resources, hunting and gathering also provided important elements in the aboriginal diet of the area. Whitetail deer, raccoons, opossums, and rabbit; and plant materials as varied as acorns, hickory nuts, persimmons, and wild grapes were eaten. Based upon proto-historical records, it is also likely that by the late prehistoric era agriculture had come to play an important part in diet. In 1700, Levasseur recorded that the local Mobile and Little Tomeh tribes were cultivating maize, beans, and squash while continuing to rely on traditional marine resources (Ibid. p.53).

Dr. Silvia also draws comparisons between aboriginal subsistence strategies in the Bayou La Batre-Coden area and those of present day residents of the Potentially Affected Communities. In her analysis of environmental and cultural continuities, Dr. Silvia points to the continuing unpredictability of the local environment. Hurricanes still sweep across this portion of the Alabama Gulf Coast so that residences in proximity to the Gulf are placed on tall pilings to allow storm driven waves to pass beneath without sweeping away the structure. This is an environment which, in its continuing relative isolation, encourages the current residents to value and strive to achieve independence and self-sufficiency, living as they do in small enclaves often with strong extended family ties.

In this setting of continued relative isolation Dr. Silvia draws attention to the role of geographic isolation and cultural uniqueness in determining community values and lifestyles which, even in the early 21st century, show significant parallels and continuities with those of the aboriginal Native Americans of this area. The culture of the Potentially Affected Communities having split

off from more dominant influences, became isolated and developed into small culturally diverse and distinctive enclaves. Dr. Silvia observes that this continuing distinctiveness and isolation, even in times of modern transportation, is less a function of geography than it is of the continued dependence on fishing in its various forms as found in the bayous, bays, rivers, and marshes of this area.

The noted uniqueness of culture in the Potentially Affected Communities was recognized as early as 1836 by Reverend Mathias Loras. Following a visit to Bayou La Batre in 1836, Loras wrote, "Living here in a retired corner of the world and consequently sheltered from the corruption of large cities, they are, as a class, of good morals, their families large and their children for the most part spiritual and respectful" (Lipscomb, p. 22).

While the original inhabitants of the southwest Alabama coast were Native Americans whose occupancy dates back to 8,000 years B.P., the first documented European contacts were made by early 16th-century Spanish explorers. Relations between the early Spanish and aboriginal natives were hostile and no attempts were made by the Spanish to colonize the area of the Potentially Affected Communities. By the close of the 17th century the French colony of Louisiana was established and Dauphin Island and other locations in the Mobile Bay region were surveyed. The LeMoyne Brothers, who were also active in the establishment of the present-day city of Montreal, Canada, were successful in establishing colonies in the region. These colonies included the present-day cities of Mobile and New Orleans, and the Potentially Affected Communities of Coden and Bayou La Batre, which are in large coastal marshes found between the cities of Mobile, Alabama; and New Orleans, Louisiana.

French settlers established friendly relations with the local Native Americans and began what would become an established and longstanding practice of intermarriage. Recently rediscovered documents recount the proof of marriage between one Jean-Baptiste and "the Indian Susanne" in 1727. What was to become the ancestral lands of their descendents is within the present geographic bounds of the Potentially Affected Communities. The fall 2004 edition of *The (Les) Descendents*, a publication of the Urbain Baudrea Graveline Geneological Association, recounts the marriage of the Rabbys into the Baptiste family and the subsequent acquisition in 1826 of the brothers Ursin and Anatole Rabby of large portions of the Pierre Baptiste claim. (Genest, p.12)

The town of Portersville was established on the shore of Portersville Bay early in the 19th century, encompassing what is presently the coastal areas of the Potentially Affected Communities. An 1821 article from the Mobile Commercial Register referring to the relationship between the growth of the interior cotton industry and the ports of Mobile and Portersville states, "The Ports of that day were Mobile and Portersville, the latter being used by trade and travel between the East and New Orleans before the channel through Grant's Pass" (Delaney, p.187). Portersville's position as a major commercial seaport came to an end in the early 1840s when John Grant excavated a ship channel connecting Mobile Bay and the Mississippi Sound. With the construction of this channel, Mobile became the primary commercial port of the area. At Portersville, tourism replaced commercial trade as an important source of area revenue (Jackson, p.305).

This still remote region became celebrated as a summer resort for the wealthy from throughout the cotton belt of the old South. Vacationers reached Portersville through a line of steamboats and stages and construction of an inland railroad contributed to the growth of the Portersville area as a vacation center. Numerous antebellum and postbellum hotels and residences were constructed. In 1906 and again in 1916 hurricanes destroyed Portersville. In the tidal wave associated with the

1916 storm, people attempted without success to save themselves and their families by tying themselves to the massive oaks of the area. Portersville was never rebuilt (Genest. p.15).

On the first Sunday in May of each year a traditional religious festival known as the Blessing of the Fleet occurs in Bayou La Batre. This event corresponds with the opening of shrimp season when local fishermen have historically left for the GOM. The Archbishop of Mobile visits Bayou La Batre to bless the fleet, the souls of fishermen who have not returned from the sea in previous years, and the shrimpers who are about to depart. This event, like the Mardi Gras, combines religious observance with festivities and food (Hamilton 217).

Although historically several political entities have assumed control of the overall geographic region, Lipscomb notes that the modern culture of the area remains unique and of a local French influence. Manifestations of African American, Asian, and Native American origins can also be observed. Place names of the region signify the continuance of early French traditions. Bayou La Batre is French for “River of the Battery” while Coden is a local corruption of the French term, “Coq d’Inde” meaning turkey.

9.2 The Asian Community

Following the end of the Vietnam War, Asians from Vietnam, Cambodia, and Laos began moving to Coden and Bayou La Batre due to the availability of work in the local seafood and shipping industries and with the aid of the Catholic Church. At the present time, Asians constitute approximately 30 percent of the local population (See Section 10, Demographics). Having no other exploitable trades, these Asian immigrants moved to the Alabama coastal region as a consequence of the readily available low-paying employment. This Asian immigration replicated a longstanding pattern of movement to the area in search of employment with a minimum of educational and skill requirements. Presently the majority of local Asians continue to work in the seafood industry with evidence of movement into other local businesses including automobile mechanics, restaurants, grocery store, pool hall, and barbershop.

The pattern of Asian immigration was characterized by the arrival of families which had been disrupted in Asia or which were unable to maintain themselves as intact families in the United States as a result of overwhelming social and cultural circumstances. Once in their new country, individuals and families were largely on their own to define themselves as American citizens as a consequence of the lack of support and enculturation services available to them. Conflict in the competition over economic and employment resources soon developed between the Asians and those local residents with whom they were in competition. Asian immigrants were on the whole unfamiliar with many of the social and economic traditions that they encountered in the United States. Living in impoverished circumstances, immigrants were often thrown into contact with marginal elements of society, which further isolated them, damaging their lives and future while social services educating immigrants into legitimate channels of economic opportunities were largely lacking.

Unlike Mobile, Alabama, which has developed a substantial middle class Asian community, the Asian immigrants in the Potentially Affected Communities have largely remained occupied by low-paying employment demanding little training. This is consistent with the larger patterns of employment of the area. Communication with leaders and older members of the Asian community is best accomplished through the use of interpreters.

10.0 Demographics

Bayou La Batre, AL – 1-Mile Radius

County and State Comparison

| Overview | | | |
|---------------------------------|---------------|-------------------|-----------------|
| | Study Area | MOBILE County, AL | ALABAMA |
| Total Persons | 871 | 399,843 | 4,447,100 |
| Population Density | 390.96 /sq mi | 324.26 /sq mi | 87.64 /sq mi |
| Percent Minority | 44.2% | 37.5% | 29.7% |
| Persons Below Poverty Level | 161 (18.5%) | 72,549 (18.1%) | 698,097 (15.7%) |
| Households in Area | 294 | 150179 | 1737080 |
| Households on Public Assistance | 5 | 3870 | 38964 |
| Housing Units Built < 1970 | 49% | 45% | 39% |
| Housing Units Built < 1950 | 16% | 14% | 13% |

| Race | | | |
|---|----------------|--------------------|----------------------|
| (* Columns that add up to 100% are highlighted) | | | |
| Race Breakdown | Study Area | MOBILE County, AL | ALABAMA |
| <u>White</u> | 487 (55.9%) | 251,985 (63.0%) | 3,161,671 (71.1%) |
| <u>African American</u> | 70 (8.0%) | 133,662 (33.4%) | 1,153,044 (25.9%) |
| <u>Hispanic</u> | 15 (1.7%) | 4,414 (1.1%) | 72,627 (1.6%) |
| <u>Asian/Pacific Islander</u> | 243 (27.9%) | 5,256 (1.3%) | 29,908 (0.7%) |
| <u>American Indian</u> | 15 (1.8%) | 2,698 (0.7%) | 22,897 (0.5%) |
| <u>Other Race</u> | 12 (1.3%) | 1,312 (0.3%) | 29,155 (0.7%) |
| <u>Multiracial</u> | 45 (5.1%) | 4,802 (1.2%) | 49,238 (1.1%) |

| Age | | | |
|---|--------------|-------------------|-------------------|
| (* Columns that add up to 100% are highlighted) | | | |
| Age Breakdown | Study Area | MOBILE County, AL | ALABAMA |
| <u>Child 5 years or less</u> | 80 (9.2%) | 35,119 (8.8%) | 355,598 (8.0%) |

| | | | |
|------------------------------------|----------------|--------------------|----------------------|
| | | | |
| <u>Minors 17 years and younger</u> | 259 (29.8%) | 109,880 (27.5%) | 1,122,612 (25.2%) |
| <u>Adults 18 years and older</u> | 611 (70.2%) | 289,963 (72.5%) | 3,324,488 (74.8%) |
| <u>Seniors 65 years and older</u> | 87 (10.0%) | 48,053 (12.0%) | 580,028 (13.0%) |

Education

| Education Level (Persons 25 & older) | Study Area | MOBILE County, AL | ALABAMA |
|---|-------------------|--------------------------|--------------------|
| <u>Less than 9th grade</u> | 153 (30.6%) | 16,722 (7.1%) | 240,333 (8.8%) |
| <u>9th-12th grade</u> | 102 (20.3%) | 41,501 (17.5%) | 473,748 (17.3%) |
| <u>High School Diploma</u> | 179 (35.7%) | 79,822 (33.7%) | 877,216 (32.1%) |
| <u>Some College/2 yr</u> | 46 (9.2%) | 52,176 (22.0%) | 591,055 (21.6%) |
| <u>B.S./B.A. or more</u> | 21 (4.1%) | 46,625 (19.7%) | 549,608 (20.1%) |

Language

| Ability to Speak English | Study Area | MOBILE County, AL | ALABAMA |
|---------------------------------|-------------------|--------------------------|----------------------|
| Population Age 5 and Over | 798 (41.5%) | 370,583 (48.7%) | 4,152,278 (48.9%) |
| Speak only English | 557 (29.0%) | 353,594 (46.5%) | 3,989,795 (46.9%) |
| Non-English at Home | 242 (12.6%) | 16,989 (2.2%) | 162,483 (1.9%) |
| Speak English very well | 91 (4.7%) | 10,597 (1.4%) | 98,566 (1.2%) |
| Speak English well | 68 (3.5%) | 3,467 (0.5%) | 30,994 (0.4%) |

| | | | |
|------------------------------|--------------|-----------------|------------------|
| | | | |
| Speak English not well | 60 (3.1%) | 2,501 (0.3%) | 25,565 (0.3%) |
| Speak English less than well | 83 (4.3%) | 2,925 (0.4%) | 32,923 (0.4%) |
| Speak English not at all | 24 (1.2%) | 424 (0.1%) | 7,358 (0.1%) |

Bayou La Batre, AL – 3-Mile Radius

(Includes Coden)

County and State Comparison

| Overview | | | |
|--|------------------|--------------------|----------------------|
| | Study Area | MOBILE County, AL | ALABAMA |
| <u>Total Persons</u> | 3,815 | 399,843 | 4,447,100 |
| <u>Population Density</u> | 215.9 /sq mi | 324.26 /sq mi | 87.64 /sq mi |
| <u>Percent Minority</u> | 37.7% | 37.5% | 29.7% |
| <u>Persons Below Poverty Level</u> | 883 (23.1%) | 72,549 (18.1%) | 698,097 (15.7%) |
| <u>Households in Area</u> | 1,276 | 150,179 | 1,737,080 |
| <u>Households on Public Assistance</u> | 42 | 3,870 | 38,964 |
| <u>Housing Units Built < 1970</u> | 47% | 45% | 39% |
| <u>Housing Units Built < 1950</u> | 17% | 14% | 13% |
| Race | | | |
| Race Breakdown | Study Area | MOBILE County, AL | ALABAMA |
| <u>White</u> | 2,400 (62.9%) | 251,985 (63.0%) | 3,161,671 (71.1%) |
| <u>African –American</u> | 389 (10.2%) | 133,662 (33.4%) | 1,153,044 (25.9%) |
| <u>Hispanic</u> | 62 (1.6%) | 4,414 (1.1%) | 72,627 (1.6%) |
| <u>Asian/Pacific Islander</u> | 801 (21.0%) | 5,256 (1.3%) | 29,908 (0.7%) |
| <u>American Indian</u> | 60 (1.6%) | 2,698 (0.7%) | 22,897 (0.5%) |
| <u>Other Race</u> | 23 (0.6%) | 1,312 (0.3%) | 29,155 (0.7%) |
| <u>Multiracial</u> | 141 (3.7%) | 4,802 (1.2%) | 49,238 (1.1%) |
| Age | | | |
| Age Breakdown | Study Area | MOBILE County, AL | ALABAMA |
| <u>Child 5 years or less</u> | 361 | 35,119 | 355,598 |

| | | | |
|------------------------------------|------------------|--------------------|----------------------|
| | (9.5%) | (8.8%) | (8.0%) |
| <u>Minors 17 years and younger</u> | 1,110 (29.1%) | 109,880 (27.5%) | 1,122,612 (25.2%) |
| <u>Adults 18 years and older</u> | 2,705 (70.9%) | 289,963 (72.5%) | 3,324,488 (74.8%) |
| <u>Seniors 65 years and older</u> | 440 (11.5%) | 48,053 (12.0%) | 580,028 (13.0%) |

Education

| Education Level (Persons 25 & older) | Study Area | MOBILE County, AL | ALABAMA |
|--------------------------------------|----------------|-------------------|--------------------|
| <u>Less than 9th grade</u> | 519 (23.0%) | 16,722 (7.1%) | 240,333 (8.8%) |
| <u>9th -12th grade</u> | 521 (23.1%) | 41,501 (17.5%) | 473,748 (17.3%) |
| <u>High School Diploma</u> | 825 (36.6%) | 79,822 (33.7%) | 877,216 (32.1%) |
| <u>Some College/2 yr</u> | 257 (11.4%) | 52,176 (22.0%) | 591,055 (21.6%) |
| <u>B.S./B.A. or more</u> | 130 (5.8%) | 46,625 (19.7%) | 549,608 (20.1%) |

Language

| Ability to Speak English | Study Area | MOBILE County, AL | ALABAMA |
|---------------------------|------------------|--------------------|----------------------|
| Population Age 5 and Over | 3,517 (43.3%) | 370,583 (48.7%) | 4,152,278 (48.9%) |
| Speak only English | 2,707 (33.4%) | 353,594 (46.5%) | 3,989,795 (46.9%) |
| Non-English at Home | 810 (10.0%) | 16,989 (2.2%) | 162,483 (1.9%) |
| Speak English very well | 354 (4.4%) | 10,597 (1.4%) | 98,566 (1.2%) |

| | | | |
|------------------------------|---------------|-----------------|------------------|
| | | | |
| Speak English well | 184 (2.3%) | 3,467 (0.5%) | 30,994 (0.4%) |
| Speak English not well | 205 (2.5%) | 2,501 (0.3%) | 25,565 (0.3%) |
| Speak English less than well | 271 (3.3%) | 2,925 (0.4%) | 32,923 (0.4%) |
| Speak English not at all | 66 (0.8%) | 424 (0.1%) | 7,358 (0.1%) |

11.0 Stakeholders

11.1 Organizations In Support of the Proposed Action:

The following organizations have indicated support for the Proposed Action:

| | |
|---|------------------------|
| Cytec Industries, Inc. | Westwego, Louisiana |
| The Atchafalaya Chapter of the American Petroleum Institute | Morgan City, Louisiana |
| Major Equipment & Remediation | Morgan City, Louisiana |
| St. Mary Industrial Group | Morgan City, Louisiana |
| State of Louisiana | Baton Rouge, Louisiana |
| Department of Economic Development | |
| Louisiana Mid-Continent Oil and Gas Association | Baton Rouge, Louisiana |
| Offshore Inland Services of Alabama | |
| Edison Chouest Offshore | Louisiana |
| Forum Industry Partners in Environmental Properties | Alabama |

11.2 Organizations Opposed to the Proposed Action

The following organizations have indicated opposition to the Proposed Action:

| | |
|--|---|
| Portersville Revival Group | Coden, Bayou La Batre, Portersville area, Alabama |
| Wildlaw | Montgomery, Alabama |
| Portersville Bay Association | Portersville, Alabama |
| South Mobile County Pipeline Study Group | Coden, Portersville, Alabama |
| Alabama Oysterman's Association | Portersville, Alabama |

11.3 Stakeholders, Both Individuals and Representatives of Organizations in the Potentially Affected Communities Contacted and Interviewed for this SIA

The following individuals have indicated opposition to the Proposed Action:

| Name | Affiliation |
|-------------------------|--|
| Barbara Holly Reid | Attorney, member of Portersville Revival Group, Coden-Mobile, Alabama |
| Fred Marceaux | Local community leader, closely involved with the Asian community, Coden, Alabama |
| Colonel Donald Frierson | U.S. Army ret., Chairperson of Portersville Bay Association; Chairman South Mobile County Pipeline Study Group, Coden/Portersville Bay |
| Dr. George Crozier | Director, Dauphin Island Sea Lab |
| John Tyson, Sr. | Attorney, Mobile, Alabama |
| E. Doody Peters | President, Alabama Oysterman's Association |
| Joseph Moreno | Oyster catcher and officer of Save Our Shells (S.O.S.) an organization not in operation at the present which was devoted to building oyster beds locally |

| | |
|-------------------------|--|
| David Lannie | President of Instrument Technical Services, Inc. |
| David Robicheaux | President of Seafood International, owner of 16 shrimp boats, local recreationist |
| Frank L. Foley | Associate Broker, Waterfront Specialist for Strachan Realty, Inc., former shrimp fisherman |
| Michael (Wolf) Ladner | Local businessman and recreationist |
| Gwendolyn Jane Waters | Local resident |
| Jimmy and Cecile Nelson | Owners/operators of the Coden Drive-in, Descendents of Early French inhabitants of the area, engaged in the seafood industry |
| Jim Fuller | CEO American Consulting Group LLC, Coden, Alabama |
| Judy Fuller | Telemedia Consultant, Coden, Alabama |
| Ernest Montgomery | Bayou La Batre resident and social activist |
| Dr. Edward Cake | Oyster biologist, Ocean Springs, Mississippi |
| Irving and Betty Royal | Coden residents |
| Dr. Read Stow | Archaeologist, Coden, Alabama |

The following individuals have indicated Mixed Feelings Concerning the Proposed Action:

| | |
|------------------|--|
| Joseph Rodriguez | Third-generation owner of Rodriguez Shipyard; Alabama representative to the Southern Shrimping Alliance and Treasurer of the Marketing Board |
|------------------|--|

Additional Professional Contacts:

| Name | Affiliation |
|--|---|
| Sam Turner, Christopher Polglase and Jeff Maymon | R. Christopher Goodwin Associates (e ² M’s cultural resources subcontractor for the MPEH™ EIS) |
| Jenny Morris | Economic Development Director, Mobile, Alabama, Chamber of Commerce |
| Stacy Hawthorn | Alabama Historical Commission |
| Hugh McClellan | Bayou La Batre Historical Society |
| Matthew Clark | Archaeologist |
| Cynthia Peurifoy | USEPA Region 4, Environmental Justice |
| Chief Wilford Longhair Taylor | Miowa Band of Choctaw |
| Kimberley Walden | Chitimacha Indian Tribe |
| Jason Emory | Chitimacha Indian Tribe |
| Henry Barnes | City Council, Bayou La Batre |
| Them Hiep Tran | Vietnamese community leader, Bayou La Batre |
| Kebby Kelley | United States Coast Guard |
| Polly Horton | Mobile County Health Department |

12.0 Local Concerns and Potential Impacts From the Proposed Action

12.1 Local Offshore Concerns and Potential Impacts from the Proposed Action:

1. Lack of information on the placement of offshore pipeline.

2. Impact of siltation on oyster beds and oyster reefs, cumulative decrease of habitat through effects of multiple projects, need to consult local oyster catchers on seed materials for new beds.
3. Adequate burial and anchorage of offshore pipeline, shrimp boats tangling nets in pipelines.
4. Directional drilling seen as desirable alternate if drilling is to take place.
5. Adverse effect on marine life resulting from pipeline construction, spills, and effluents.
6. Adverse effect on the livelihood of those dependent on coastal waters.
7. Degradation of the pristine nature of the adjacent estuary region of Grand Bay.
8. Possible effect of hurricanes on the offshore pipeline.
9. Loss of duck hunting habitat and other recreational opportunities.
10. Further pollution of the waters of Portersville Bay.

12.2 Local Onshore Concerns and Potential Impacts from the Proposed Action:

1. Lack of direct explanations of the Proposed Action at what is considered the local level for residents of the Potentially Affected Communities.
2. Lack of adequate biological study along ROW of the Proposed Action.
3. Cultural Resource Issues including destruction of Native American, African American, and Colonial sites by prior actions of the gas industry; protection of Shell Midden 1Mb1 from further destruction; adequacy of cultural resource surveys for this and previous pipeline projects-lack of local consultation; possibility of historic black cemetery in vicinity of 1MB273; unsurveyed access roads; three houses situated near the proposed ROW which have not been evaluated.
4. Cumulative effect of multiple pipelines creating “pipeline corridors.”
5. Inadequate notice of the Proposed Action to members of the Potentially Affected Communities.
6. Lack of positive economic benefits to the members of the Potentially Affected Communities.
7. Lack of local infrastructure, (fire, police, and highways) to respond to emergency in the event of fire, explosion, or gas leak; related health issues caused by natural gas pipeline.
8. The sense that local culture is taking environmental risks for the rest of the country’s energy needs and the general lack of environmental defense standards by the responsible Alabama agencies.
9. Perceived change of land use classification from residential/recreational/light industry to heavy industry.
10. Facilitation of future undesired industrial development.
11. Fair compensation for land taken for Proposed Action, perceived fraud in the procurement of land, compensation for only ROW when entire portions of land are rendered otherwise unusable.
12. Perceived devaluation of land parcels adjoining the Proposed Action site due to introduction of hazards and safety concerns.
13. Adequacy of Native American consultation.
14. Protection of Site 1MB373 and Site 1MB1 (Andrews Place). Site 1MB1 is a multicomponent aboriginal shell mound/midden that was recorded by Walter B. Jones of the University of Alabama in 1933. It is approximately 200–250 feet (61–76.25 meters) south of the western terminus of the project corridor. Portions of this site have been removed with the shell utilized for road construction and manufacture of poultry feed. An examination of the site in 1999 by Goodwin and Associates reported that what is left of the mound is stable and seems to be in “Good condition.” Site 1MB1 is recommended eligible for listing on the National Register of Historic Places (NRHP). (R. Christopher

Goodwin & Associates, Inc.). Dr. Read Stowe, an archaeologist who has recently performed a study of the portions of 1MB1 south of the project area states that the site abuts on Henry Johnson Road from the south and was clearly interrupted by construction of this road. He further asserts that Site 1MB373 is in fact a northern portion of 1MB1 which has been surficially separated from Site 1MB1 initially by construction of Henry Johnson Road and subsequently by construction of the Gulfstream natural gas pipeline which closely parallels the ROW of the Proposed Action.

12.3 Local Concerns for Cumulative Impacts of the Proposed Action

12.3.1 Local Concerns for Offshore Cumulative Impacts of the Proposed Action:

1. Destruction or impairment of oystering, fishing, and shrimping through the construction of multiple pipelines.
2. Perceived destruction or degradation of the pristine nature of Grand Bay.

12.3.2 Local Concerns for Onshore Cumulative Impacts of the Proposed Action:

1. Loss of the distinctive cultural identity of the area resulting from multiple pipeline developments.
2. Changes to the natural environment resulting from multiple pipeline developments.
3. Purchase of significant portions of land in the Potentially Affected Communities by the natural gas industry effectively removing this property from the cultural base of the community.
4. Creation of an industrial park.
5. Economic losses due to degradation of seafood industry.
6. Fear of gas industry-related emergencies and lack of ability to respond. At least two other natural gas facilities, Gulfstream and Duke Energy, have distributed pamphlets to some residents of the Potentially Affected Communities advising residents on how to detect leaks and terrorist activities. These pamphlets warn residents to evacuate the area immediately, to warn unsuspecting individuals entering the area, and not to operate electrical engines or motor vehicles.
7. Sense that residents of the Potentially Affected Communities are taking disproportionate and unacceptable risks for the benefit of the nation's needs.
8. Perceived fraudulent practices by representatives of the natural gas industry to induce acceptance of natural gas facilities. Residents cited an announcement for a different project promising employment to local citizens and environmental grants in the amount of \$3.5 million per year. Residents of the Potentially Affected Communities deny that any significant jobs for locals were created and deny having received environmental grants.

13.0 Prediction of the Responses of the Potentially Affected Groups and Communities to Impacts

Residents within the Potentially Affected Communities view the purchase of land for multiple pipeline corridors as removing land from private and local ownership to the corporate ownership of the several natural gas companies which have either concluded projects or might logically be expected to place natural gas projects including pipelines, compressor stations, and valve stations in the Potentially Affected Communities. The effect of these land transfers is to reduce options of local residents for occupation in this socially and culturally distinctive area for which there is a marked and specific affection. Discussions conducted with local residents in the course of

developing this SIA indicate a widespread sense of outrage and despair at the prospect of losing control of their community. These responses are a consequence of locals feeling that there is little they can do to influence an unwanted order of change in the communities to which many can trace more than 200 years of ancestral residency. There is a widespread sense that the Potentially Affected Communities are assuming a disproportionate burden of development as a consequence of their economic status, lack of political influence, and longstanding status as communities historically falling outside the mainstream of regional cultural and social developments.

Local responses also include a significant level of fear of incidents related to an expanded pipeline network including onshore and offshore leaks, accidental explosions, and possible terrorism-related incidents intended to disrupt the domestic natural gas supply.

14.0 Potential Mitigations Identified Through Discussions with Residents of the Potentially Affected Communities and Knowledgeable Professionals, and Analysis

14.1 Offshore Mitigations:

1. Distribute pipeline landfalls to include the eastern side of Mobile Bay.
2. Use of a shallow-draft drilling rig and oil-field vessels.
3. Use of balancing techniques to reduce the draft of the drilling rig during ingress and egress.
4. Utilization of Best Management Practices (BMPs) applicable to offshore development and monitoring by independent consultants.
5. Establishment of a trust fund from natural gas profits to be utilized by local groups of interest within the Potentially Affected Communities to enhance marine and estuary areas, provide compensation to commercial fishing interests for loss of income and economic resources, establish educational programs for advancement of commercial and recreational fishing techniques, and continue monitoring of potential adverse effects on marine interests.
6. Offshore placement of pipeline to avoid oyster beds and other sensitive marine areas.

14.2 Onshore Mitigations:

1. Funding by the natural gas industry of complete biological, cultural resource, and ethnographic surveys of the Potentially Affected Communities.
2. Purchase by the natural gas industry of land to be donated as a historic district and conservation set-asides to preserve local values; the same to be placed under control of interested groups within the Potentially Affected Communities.
3. Funding by the natural gas industry of community protection infrastructure in the event of a pipeline-related incident would include funding for a full-time Bayou La Batre fire department which is presently volunteer, funding for a Coden fire department which does not currently exist, equipment adequate to deal with potential fire- and safety-related incidents stemming from pipelines, a full-time Bayou La Batre medical clinic which is currently open only a portion of the day, a Coden medical clinic, a locally situated medical helicopter service, and a maritime culture school to train residents in mariculture businesses.
4. Independent appraisal of properties within the Potentially Affected Communities and compensation to local property owners for devaluation of land and displacement.
5. Delineation of the boundaries and Phase II archaeological testing of the aboriginal Native American site 1MB1 which has been recommended as eligible for listing on the NRHP. Surveys and testing should include site 1MB373, which is likely a continuation of 1MB1.

6. Consultation with African-American historical interests regarding site 1MB372, which was the home place of individuals in the community who were significant in the history of south Alabama. Booker T. Washington and other Tuskegee administrators were also known to frequent this site. Although site forms indicate that this site was destroyed by prior pipeline construction, some portions of the site might still be intact and subject to further investigation.
7. Unanticipated Discoveries Plan. This plan should have a professional archaeologist in place to monitor all subsurface work in the vicinity of 1MB1, 1MB373, 1MB273, and Meyer's Camp. Unmapped cemeteries are reported in the area of 1MB273 and Meyer's Camp. The presence of a Project Manager on scene at these locations during construction does not provide sufficient protection for cultural resources including human remains that might be discovered in the vicinity of these sites.
8. Creation of a sufficient adverse impact/disaster relief fund to be administered by a local board of trust and to be distributed in the Potentially Affected Communities for unanticipated adverse impacts/disasters.
9. Recognition of public interest groups in the Potentially Affected Communities as consulting parties to the Proposed Action and establishment of a Programmatic Agreement regarding community input.

15.0 References Cited

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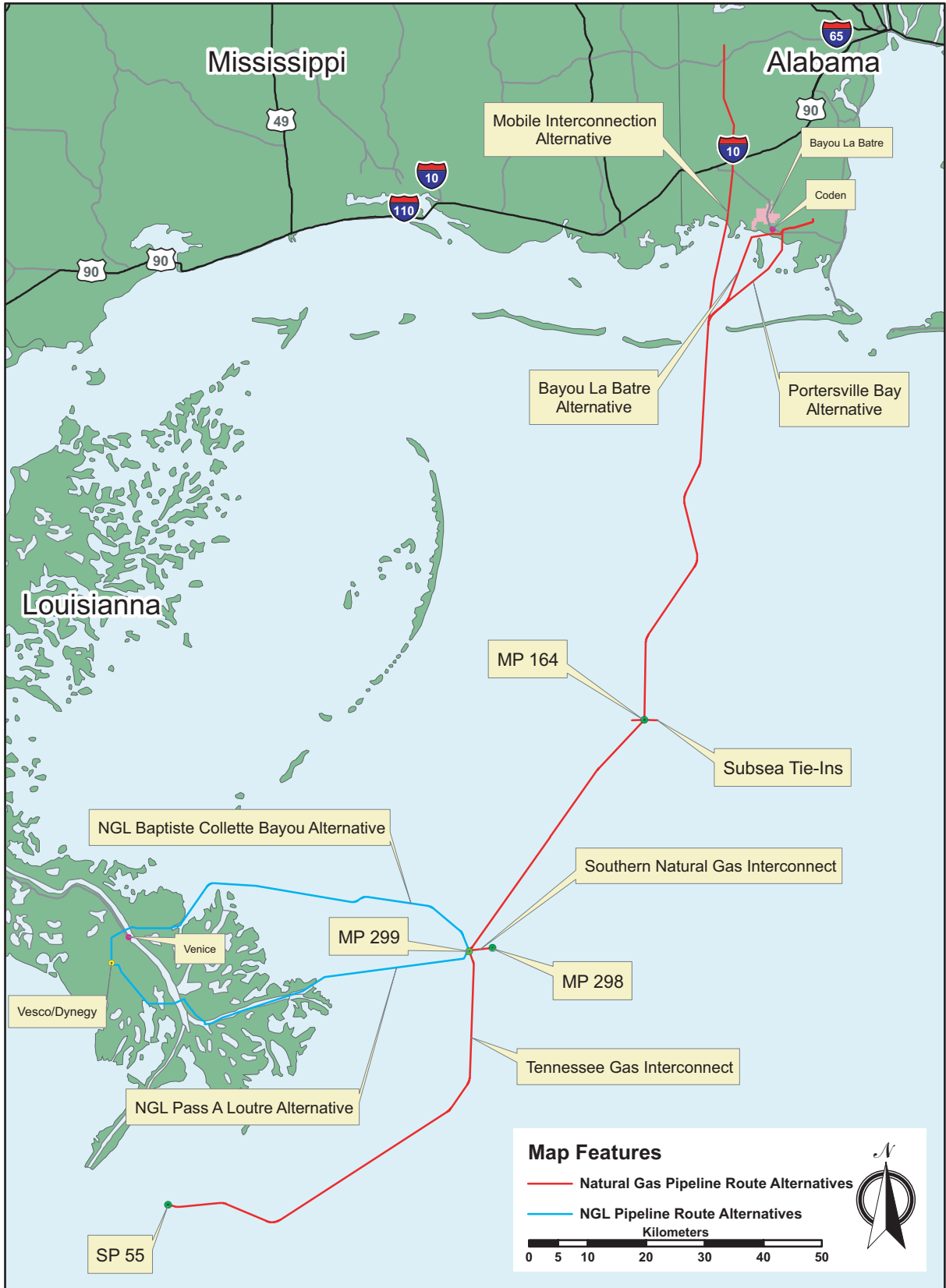
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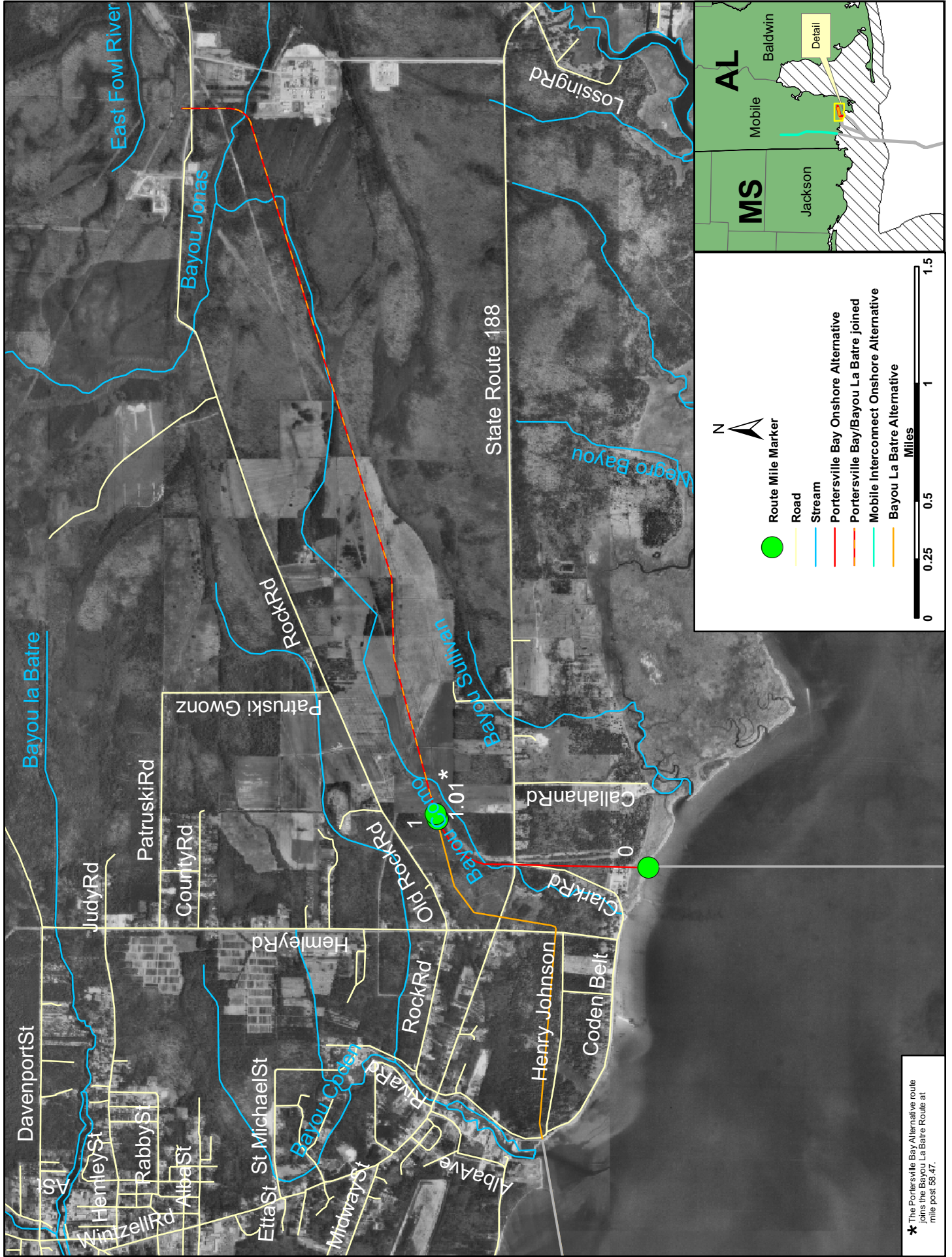
Attachments

Attachment 1 – Location Diagram

Attachment 2 – Route Map Proposed Coden Onshore Pipeline



Attachment 1 - Location Diagram



* The Portersville Bay Alternative route joins the Bayou La Batre Route at mile post 58.47.

Attachment 2 - Route Map Proposed Coden Onshore Pipeline