EXHIBIT 14 ENDANGERED SPECIES STUDY

(Narrative Report Only) (Full Report is in Volume 2)

ENGLAND INDUSTRIAL DEVELOPMENT DISTRICT ALEXANDRIA, LOUISIANA



HEAVY INDUSTRIAL SITE W2 SITE CERTIFICATION PROGRAM

THREATENED AND ENDANGERED SPECIES STUDY

MARCH 19, 2015

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England Airpark Site W2 Certification Threatened and Endangered Species Study March 19, 2015

THREATENED AND ENDANGERED SPECIES STUDY

1.1 Proposed Action

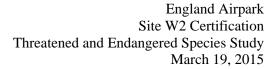
The England Economic and Industrial Development District (EEIDD), also known as the England Authority, is proposing to develop a piece of property as a heavy industrial site. The site will consist of streets, utilities, and other amenities to provide lots and acreage for future industrial purposes. The site is shown in Appendix A.

1.2 Affected Environment

The Endangered Species Act (ESA) [16 U.S.C. 1532 et. seq.] of 1973, as amended, was enacted to provide a program for the preservation of endangered and threatened species and to provide protection for the ecosystem upon which these species depend for their survival. All Federal agencies are required to implement protection programs for designated species and to use their authorities to further the purposes of the act. Responsibility for the identification of a threatened or endangered species and development of recovery plans lies with the Secretary of the Interior and the Secretary of Commerce.

The United States Fish and Wildlife Services (USFWS) and the National Marine Fisheries Service (NMFS) are the primary agencies responsible for implementing the ESA. The USFWS is responsible for birds, terrestrial, and freshwater species, while the NMFS is responsible for non-bird marine species. The USFW's responsibilities under the ESA include: (1) the identification of threatened and endangered species; (2) the identification of critical habitats for listed species; (3) implementation of research on, and recovery efforts for, these species; and (4) consultation with other Federal agencies concerning measures to avoid harm to listed species. An endangered species is a species in danger of extinction throughout all or a significant portion of its range. A threatened species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range. Proposed species are those that have been formally submitted to Congress threatened when any of the five following criteria occur: (1) the current/imminent destruction, modification, or curtailment of their habitat or range; (2) overuse of the species for commercial, recreational, scientific, or educational purposes; (3) disease or predation; (4) the inadequacy of existing regulatory mechanisms; and (5) other natural or human-induced factors affection continued existence.

In addition, the USFWS has identified species that are candidates for listing as a result of identified threats to their continued existence. The "candidate" designation includes those species for which the USFWS has sufficient information on hand to support proposals to list as endangered or threatened under the ESA. However, proposed rules have not yet been issued because such actions are precluded at present by other listing activity.





The ESA also calls for the conservation of "Critical Habitat" – the areas of land, water, and air space that an endangered species needs for survival. Critical habitat also includes such things as food and water, breeding sites, cover or shelter, and sufficient habitat area to provide for normal population growth and behavior.

1.3 Federally Listed Species

Four federally listed species occur within Rapides Parish; the red-cockaded woodpecker (*Picoides borealis*), the Louisiana pine snake (*Pituophis melanoleucus ruthveni*), the Louisiana Pearlshell (*Margaritifera hembeli*), and the Interior Least Tern (*Sternula antillarum athalassos*). (See Table 1-1) Correspondence was submitted to the USFWS on January 22, 2015 regarding threatened and endangered species in the vicinity of the subject property. An updated project map was submitted on February 12, 2015. The USFWS replied on February 24, 2015 and March 11, 2015, stating that the project, as proposed, will have no effect on the resources listed above in paragraph 1.2.

Table 1-1 Federally Protected Species Inhabiting Rapides Parish, Louisiana

Common (Scientific) Name	Status	Habitat
Red-cockaded woodpecker (Picoides borealis)	Endangered	Open stands of pines with a minimum age of 80 to 120 years.
Bald Eagle (Haliaeetus leucocephalus)	Delisted*	Quiet areas, rivers, or lakeshores with large, tall trees.
Louisiana pine snake (Pituophis melanoleucus ruthveni)	Candidate	Sandy soils in longleaf pine forest.
Louisiana Pearlshell (Magaritifera hembeli)	Threatened	Flowing water at depths ranging from 12 to 20 inches on sand and gravel substrates. The surrounding forest community is mixed hardwood-loblolly pine with a typical canopy closure of 75 to 100 percent.
Interior Least Tern (Sternula antillarum athalassos)	Endangered	Nesting habitat includes bare or sparsely vegetated sand, shell, and gravel beaches, sandbars, islands, and salt flats associated with rivers and reservoirs.

Source: LDWF 2015

1.4 State-Listed Species

The Louisiana Natural Heritage Program (LNHP), part of the Louisiana Department of Wildlife and Fisheries (LDWF), maintains lists of Species of Concern (SOC). This list includes species whose occurrence in Louisiana is or may be in jeopardy, or with known or perceived threats or population declines. These species are not necessarily the same as those protected by the Federal government under the ESA. A complete list of state-protected species can be found in Appendix D of this document.

^{*}The bald eagle receives Federal protection despites its removal from the Federal Threatened and Endangered species list under the Bald and Golden Eagle Protection Act.



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The LDWF was contacted on January 22, 2015, an update was submitted on February 12, 2015, and the LDWF responded on March 6, 2015 stating that after careful review of their database, no impacts to rare, threatened, or endangered species or critical habitats are anticipated for the proposed project. They also noted that no state or federal parks, wildlife refuges, scenic streams, or wildlife management areas are known at the specified site within Louisiana's boundaries.

1.5 Conclusion

Based upon the comments received from the various federal and state agencies (attached hereto in Appendix C) regarding endangered and threatened species; and other potential environmental impacts, it is our opinion that the development of the piece of property for heavy industrial purposes (i.e. Industrial Park type setting), will have no impact to any threatened or endangered species.

According to the ESA, a significant impact on threatened and endangered species would occur if any action resulted in a jeopardy opinion for any endangered, threatened, or rare species. No federally or state listed species or breeding habitat for those species has been identified at the proposed site. Thus, there are no anticipated cumulative impacts to threatened and endangered species.

Please note that this Endangered and Threatened Species Study does not include wetlands delineations or any determinations of wetlands on the site. The wetlands delineation is established under a separate Study.