

# Exhibit FF:

## Whitehall Industrial Site

### LA SHPO Letter of Site Recommendation



**LOUISIANA CENTRAL**  
Industry & Entrepreneurship





BILLY NUNGESSER  
LIEUTENANT GOVERNOR

**State of Louisiana**  
**OFFICE OF THE LIEUTENANT GOVERNOR**  
**DEPARTMENT OF CULTURE, RECREATION & TOURISM**  
**OFFICE OF CULTURAL DEVELOPMENT**  
**DIVISION OF ARCHAEOLOGY**

KRISTIN P. SANDERS  
ASSISTANT SECRETARY

21 February 2024

Steven Filoromo  
Principal Investigator  
TerraXplorations  
58025 LaBauve Ave  
Plaquemine, LA 70764

# Whitehall Industrial Site

## LA SHPO Letter of Site Recommendation

Re: Draft Report  
La Division of Archaeology Report No. 22-7458  
*Phase I Cultural Resources Survey of the Whitehall Plantation Property, Concordia Parish, Louisiana*

Dear Steven Filoromo:

We acknowledge receipt of your letter dated 18 December 2023 and one copy of the above referenced report. The submittal is considered Due Diligence. Our response is for preliminary, informational purposes only. The opinion stated below could change once the responsible federal and/or state agency initiates consultation with our Office and provides their determination of effects.

The submittal of this information is not a substitution for consultation under the National Historic Preservation Act and the National Environmental Policy Act.

We have completed our review of this report based on the information submitted and have the following comments to offer.

It would be helpful to include the Figure numbers on Figure 4.1 rather than the frame numbers as the latter are not mentioned in the report.

The discussion of 16CO220 does not mention the immediately adjacent facility shown on the 1959 aerial image (Figure 5.38).

The discussion of 16CO222 states that a 1x1 m unit was excavated but the cited photograph (Figure 5.51) does not show anything like a test unit. Exactly what is meant by the term "brick pile"? Were any of the bricks laid in a pattern suggesting an intact feature? Was the extent of the brick pile determined by probing or other efforts?

In our Office's opinion, sites 16CO216 through 16CO225 are not eligible. The Divisions of Archaeology and Historic Preservation have no further concerns for this project.

We look forward to receiving one bound, double-sided copy of the final report along with a pdf copy. If you have any questions, please contact Chip McGimsey at [cmcgimsey@crt.la.gov](mailto:cmcgimsey@crt.la.gov) or 225-219-4598.

Sincerely,

Dr. Chip McGimsey  
State Archaeologist



**TERRAXPLORATIONS, INC.**

*Leading the future in recording America's past*

February 27, 2024

Charles McGimsey, RPA  
State Archaeologist  
Office of Cultural Development, Recreation and Tourism  
P.O. Box 44247  
Baton Rouge, LA 70804

RE: *A Phase I Cultural Resources Survey of the Whitehall Plantation Property, Concordia Parish, Louisiana*

Dear Dr. McGimsey,

Enclosed please find one (1) bound copy of our report *A Phase I Cultural Resources Survey of the Whitehall Plantation Property, Concordia Parish, Louisiana*. One (1) digital copy of our report and shape files for our report were submitted by email. If you have any questions regarding these reports, please contact me at 205-657-0391 or [ejpepperman@terraxplorations.com](mailto:ejpepperman@terraxplorations.com).

Sincerely,

Emma Jackson Pepperman  
Principal Investigator and Historian

The Final Report has been  
reviewed and accepted.

Report # 22-7458

Kristin P. Sanders  
State Historic Preservation Officer

Date 03/04/2024

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