

Exhibit GG. Harvey Site LA SHPO Letter of Site Recommendation





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

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7 June 2018

Brand Kerr
Project Manager
SURA
PO Box 14414
Baton Rouge, LA 70898

Re: Draft Report
La Division of Archaeology Report No. 22-5933
Phase I Cultural Resources Survey of 344 acres (139.21 hectares), West Feliciana Parish, Louisiana

Dear Ms. Kerr:

We acknowledge receipt of your letter dated 15 May 2018 and one copy of the above referenced report that was submitted as Due Diligence. This letter is for preliminary, informational purposes only and does not constitute consultation or agency coordination with our Office as defined in 36 CFR 800: "Protection of Historic Properties" or by any state regulatory process. The recommendation stated below could change once the responsible federal and/or state agency initiates consultation with our Office. Consultation with the State Historic Preservation Office is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public. We have completed our review of this report and have the following comments to offer:

In the Procedures section, it would be appropriate to explain why the previous project area was not surveyed. Given that it was undertaken in 1984, it could be anticipated that it did not meet the Division's current survey standards. As it turns out, it does closely meet current standards; but it would still be appropriate to discuss this.

It would be helpful to overlay the survey probability map on a topo map. Looking at Figure 6 and 8, it is not clear how the defined probability areas match the criteria stated on page 33. It seems clear that other criteria were incorporated into the decision (such as proximity to some roads). Our office also notes that it is our understanding that the Kisatchie National Forest incorporates the high and medium probability zones together for the purposes of field survey.

In the discussion of 16WF195, it would be appropriate to note that the site appears to be the structure present on the 1963 topo map and that it is not evident on the 1906 map. Is it possible to determine more precise manufacture age ranges for the Coke and Gordon's bottles?

We recommend clarification of the language in various sections for sites 16WF198 and 16WF199. The report states that these two sites are recommended as eligible for nomination, but then goes on to recommend further work at each. If the authors are confident in the site's eligibility, then the subsequent language should be revised to recommend mitigation if the site(s) cannot be avoided during development. Alternatively, if the intent is to state that the eligibility of these two sites cannot be determined with the current level of work, then the term "undetermined eligibility" should be used, and the recommendation is for additional investigations to assess their eligibility.

If the proposed project were to require federal permits, licenses, funds, loans, grants, or assistance for development, we would recommend to the federal or state agency or agencies that sites 16WF47, 16WF195, 16WF196, and 16WF197 are not eligible for nomination to the National Register of Historic Places. Structure 63-00113 is recommended as not eligible due to the extensive alterations, and our office would concur with this recommendation. However, an updated LHRI form should be submitted for this structure. We would recommend that site 16WF31 is eligible for nomination to the National Register. Our office also notes that cemeteries are

protected under various state laws, and concur with the recommendation of a 100 foot buffer around the existing cemetery limits to avoid any impacts to the cemetery during future construction. We would recommend that sites 16WF198 and 16WF199 are undetermined with respect to their eligibility for nomination to the National Register. Our office recommends additional investigations at those sites of undetermined status to determine their eligibility if they cannot be avoided by the proposed project. Our office looks forward to consulting on the appropriate strategies for evaluating/mitigating these sites.

We look forward to receiving one bound copy and a pdf of the final report. If you have any questions, please contact Chip McGimsey at cmcgimsey@crt.la.gov or 225-219-4598.

Sincerely,

A handwritten signature in cursive script that reads "Kristin P. Sanders".

Kristin Sanders
State Historic Preservation Officer