Exhibit GG. West Feliciana Industrial Park Site LA SHPO Letter of Site Recommendation

Baton Rouge Area Chamber®

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West Feliciana Industrial Park Site LA SHPO Letter of Site Recommendation

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BILLY NUNGESSER
LIEUTENANT GOVERNOR

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

RENNIE S. BURAS, II
DEPUTY SECRETARY

West Feliciana Industrial Park Site LA SHPO Letter of Site Recommendation

26 April 2017

Matthew Chouest
SURA
PO Box 14414
Baton Rouge, LA 70898-4414

Re: Draft Report
La Division of Archaeology Report No. 22-5529
Phase I Cultural Resources Survey of 410 Acres (165.9 hectares), West Feliciana Industrial Park, West Feliciana Parish, Louisiana

Dear Mr. Chouest:

We acknowledge receipt of your letter dated 12 April 2017 along with two copies of the above referenced report. We have reviewed the report and offer the following comments.

Hopefully the new survey report can be incorporated into the discussions where appropriate.

On Figure 15, site 16WF153 is mislabeled as 16WF143. In addition, the locations of 16WF45, 16WF153 and 16WF154 are different than shown on our GIS. If, based upon your work, you believe the locations should be adjusted, then it would be helpful to include that information in the site description (and in the updated site forms). The new report (22-5541) provides more specific locational maps for each of the sites that may help in making these determinations. A possible factor in the discrepancy is that the UTM coordinates on the prior site forms may have used the 27 NAD, which would place them some 200 m south of where NAD 83 or WGS 84 puts them today.

IN particular, there appears to be a significant discrepancy in the location of 16WF154, raising the question of whether the site found during this survey is actually a new site or if 154 and its original location was misplotted. Hopefully you can work with Emily Dale to resolve that question.

We do not have a record of receiving the site update forms for 16WF43, 16WF45, 16WF153 and 16WF154.

We concur that sites 16WF43, 16WF45, 16WF153, 16WF154, 16WF192 and 16WF193 are not eligible for nomination to the National Register of Historic Places, and that no historic properties will be impacted by this project. The area of the Salvation Church cemetery (16Wf191) must be avoided and we also concur with the recommendation that a buffer of at least 100 feet be placed around the current boundaries of the cemetery (16WF191). If the cemetery cannot be avoided during the project, consultation with our office to evaluate options for removal should be initiated.

We look forward to receiving two bound copies of the final report along with a pdf of the report. If you have any questions please contact Chip McGimsey at the Division of Archaeology by email at cmcgimsey@crt.la.gov or by phone at 225-219-4598.

Sincerely,

Kristin P. Sanders

Kristin Sanders
Deputy State Historic Preservation Officer

SURA, Inc.

(Surveys Unlimited Research Associates, Inc.)

Since 1986 Archaeology Historic Preservation Cultural Resources Management

West Feliciana Industrial Park Site LA SHPO Letter of Site Recommendation

January 8, 2016

Mr. Phil Boggan
Deputy Assistant Secretary
Division of Archaeology
Office of Cultural Development
Department of Culture, Recreation & Tourism
P.O. Box 44247
Baton Rouge, LA 70804

Re: 107 acres for LED certification
West Feliciana Parish, La.

Dear Mr. Boggan:

I am writing this letter on behalf of Mr. Jim Ferguson, Director of Public Works, West Feliciana Parish.

The Parish wishes to certify for industrial development the 107 acres shown in Exhibit A. A review of your files shows that this area was surveyed by R Christopher Goodwin & Associates (22-2399) in 2001 (Exhibit B). Their methodology involved shovel tests at both 30 m and, where appropriate, 50 m intervals (Exhibit C). They recorded seven cultural locations but none even qualified as a site. They recommended the area be cleared for development (Exhibit D).

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(225) 381-8206

I respectfully request that you concur with our own recommendation that no further cultural resource work is needed for this tract.

Sincerely,

Malcolm K. Shuman, Ph.D.
SURA, Inc.

Enc. Exhibits A-D

Cc: Mr. Jim Ferguson
Mr. Jim Cavanaugh

No known historic properties will be affected by this undertaking. This effect determination could change should new information come to our attention.

Phil Boggan
Deputy State Historic Preservation Officer

Date

02/12/2016

EXHIBIT A: client map of 107 acres

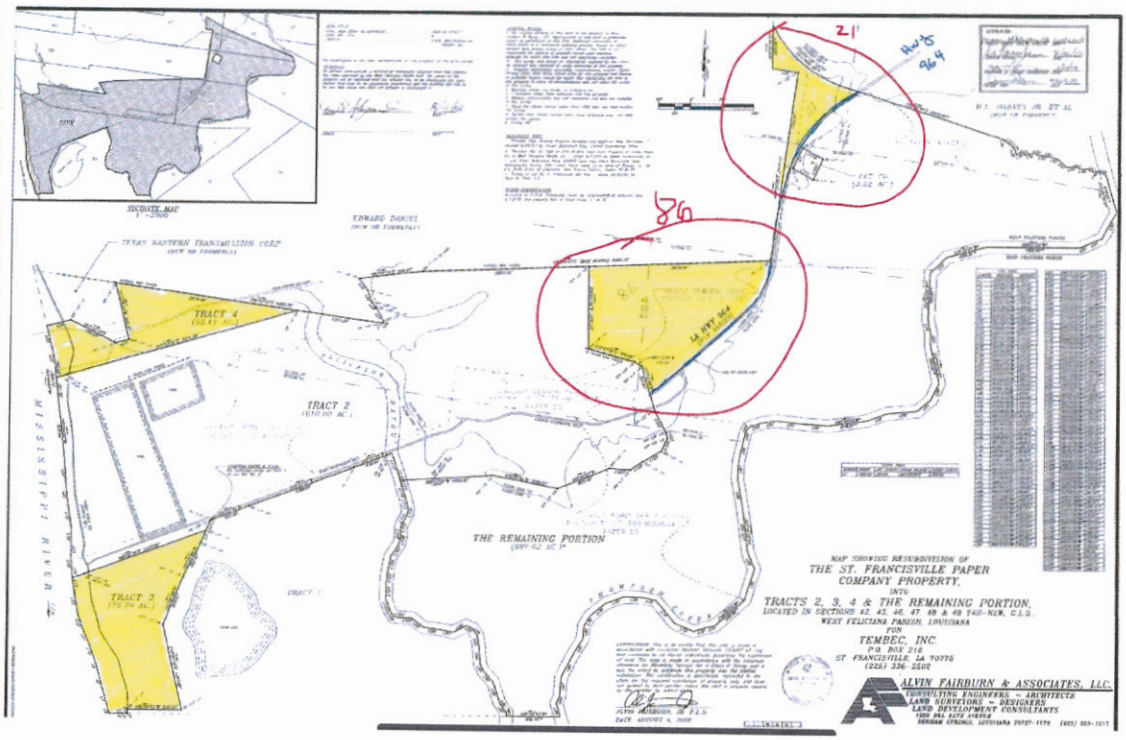

EXHIBIT B: DIVISION OF ARCHAEOLOGY MAP

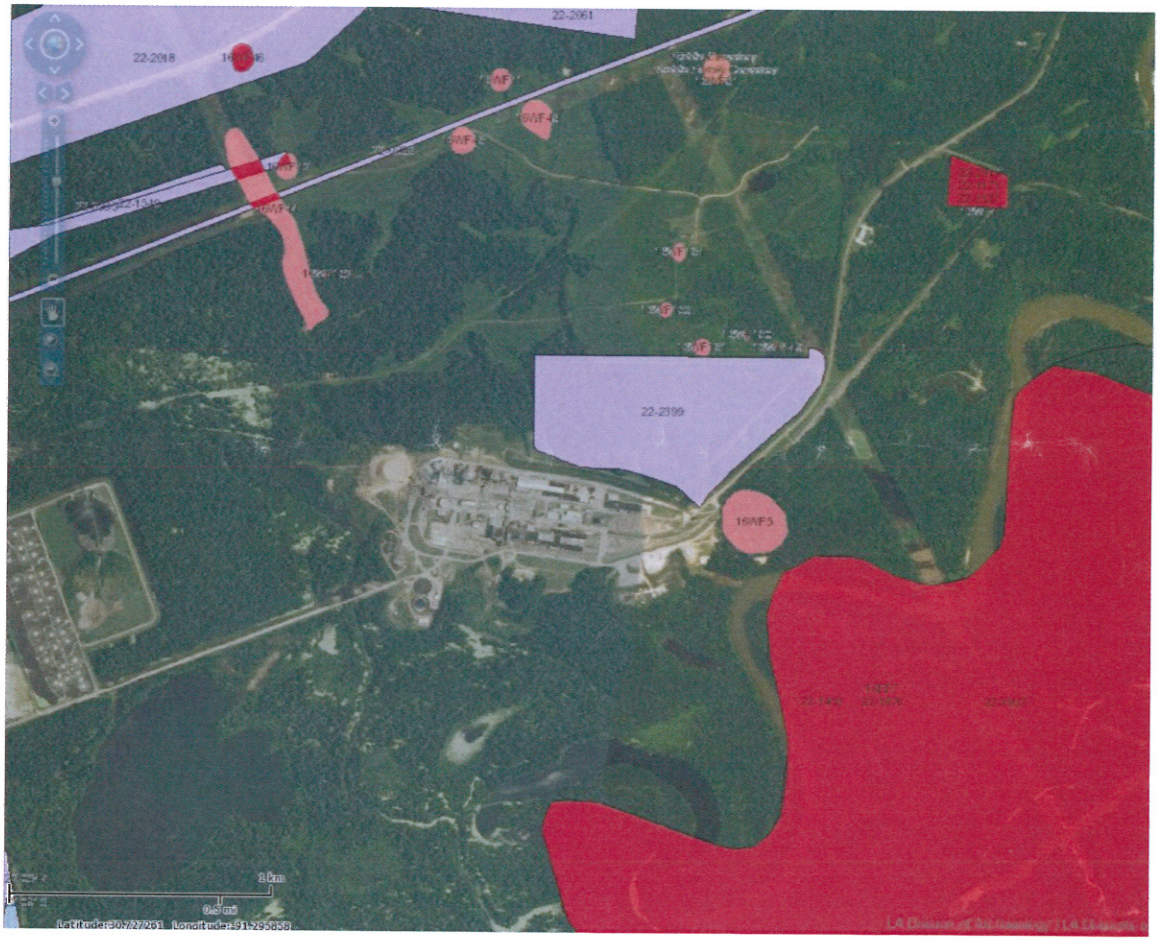

EXHIBIT C: METHODOLOGY USED IN 2001 STUDY

ject area is positioned on the relatively level surfaces of the bluff top and the terrace. These elevated, rather level surfaces would provide a location safe from flooding or migrations of nearby Thompson Creek and the Mississippi River. Additionally, the riverine resources of those waterways would be within easy reach of the bluff top. Therefore, the majority of the proposed Thompson Creek Energy Center project area was considered to have a high probability for containing archeological sites. A small portion of the western end of the proposed project area, however, lies on a portion of the bluff top that has been dissected by numerous small intermittent streams that drain into Alligator Bayou. The rugged topography of that portion of the project area would not have provided a setting amenable to human settlement, nor would intact cultural deposits be expected to be preserved along the steep slopes of the area. Therefore, the western 160 m (525 ft) of the 42.5 ha (105 ac) power generation facility was considered to have a low probability for containing intact cultural resources.

The possibilities for encountering intact cultural deposits are greatly diminished, however, in areas where deep plowing associated with modern agriculture and commercial logging and reforestation have been practiced. Logging and mechanized agriculture can damage severely buried archeological remains. The entire project area has been subjected to these and other types of disturbances (e.g., road grading) for the past 100 years (see Chapter IV).

Field Methods

The Phase I cultural resources survey and archeological investigation of the proposed Thompson Creek Energy Center Project area was completed between April 8 and 18, 2001. The location of the proposed power generation facility measures 1,150 m (3,773 ft) east-west by 560 m (1,837 ft) north-south, and it encompasses 42.5 ha (105 ac). It is positioned atop Balls Bluff adjacent to the west side of Louisiana Highway 964, and north of the extant Crown Vantage paper mill. The proposed 0.8 ha (2 ac) power substation is positioned on a terrace of Thompson Creek to the southeast of Highway 964. The third component of the Thompson Creek Energy Center project consists of a 30.5 m (100 ft) wide 100 m (328 ft) long corridor that will link the power generation facility with the substation.

Archeological inventory of the proposed project area was designed to identify all prehistoric and historic period cultural resources located within the project area. The survey was comprehensive in nature; it took into account the results of all previously conducted archeological surveys completed within the immediate area, the distribution of all previously recorded cultural resources, as well as an assessment of the potential of the proposed project area to contain cultural resources. The field crew traversed and visually reconnoitered the entire proposed project area. Additionally, systematic shovel testing was conducted throughout the project area.

Shovel Testing

Once pedestrian survey had been completed, a series of parallel, north-south survey transects were laid out across the project area. Survey transects were spaced at 30 m (98 ft) intervals, and shovel tests were excavated at 30 m (98 ft) intervals along each transect across the majority of the proposed project area. Shovel tests were excavated at 50 m (164 ft) intervals in the western 160 m (525 ft) of the proposed 42.5 ha (105 ac) generation facility due to the dissected topography that characterizes that portion of the project area.

Each excavated shovel test measured approximately 50 cm (19.7 in) in diameter and each was excavated to a depth of 100 cm (39.4 in) below surface. All shovel tests were excavated in 10 cm (3.9 in) artificial levels within natural strata, and the fill from each level was screened separately. The matrix excavated from each shovel test was screened through 0.64 cm (0.25 in) hardware cloth, and the matrix was examined for cultural material. Soil characteristics were recorded using Munsell Soil Color Charts and standard soil nomenclature. Information regarding soil texture and other characteristics was recorded on standardized record forms, shovel test forms, and project maps. Finally, each shovel test was backfilled immediately upon completion of the archeological recordation process.

Site Recordation and Delineation

A total of seven cultural resources loci were identified as a result of this investigation (Table

EXHIBIT D: ABSTRACT OF 2001 STUDY

Louisiana Division of Archaeology

Close Window - Return to List

Report Number	22-2399
Title	Phase I Cultural Resources Survey and Archeological Inventory of the Proposed Thompson Creek Energy Center, West Feliciana Parish, Louisiana.
Date	2001
Author	VandenBosch, Jon C., Susan Barret Smith, Karl Huebchen, and William P. Athens
Contractor	R. Christopher Goodwin & Associates, Inc.
Sites Associated	None
Parishes	West Feliciana
Abstract	This report presents the results of a Phase I cultural resources survey and archaeological inventory of the proposed Thompson Creek Energy Center in West Feliciana Parish, Louisiana. This survey was conducted by R. Christopher Goodwin & Associates, Inc., on behalf of URS Greiner Corporation of Baton rouge, Louisiana. The investigation was designed to identify and to evaluate all cultural resources (archeological sites, isolated finds, standing structures, cemeteries, and traditional cultural properties) that may be impacted as a result of this undertaking. This survey included examination of the proposed 42.5 ha (105 ac) generation facility area, the location of the proposed 0.8 ha (2 ac) substation facility, and the 30.5 m (100 ft) wide, 100 m (328 ft) long corridor that will extend between the two areas. Therefore, a total of 43.6 ha (107 ac) was encompassed by the survey. The project area situated in Sections 47 and 48 of Township 4 South Range 2 West. The Phase I cultural resources survey and archeological inventory included pedestrian reconnaissance augmented by systematic shovel testing throughout the Area of Potential Effect, as well as an examination of those files housed and maintained at the Louisiana Department of Culture, Recreation and Tourism, Office of Cultural Development, Divisions of Archaeology and Historic Preservation in Baton Rouge. These efforts were carried out between April 9 and 18, 2001. Shovel tests generally were excavated at 30 m (98 ft) intervals through the Area of Potential Effect; however, some shovel tests were excavated judgementally along the western edge of the project area. The field efforts resulted in the recovery of 10 prehistoric and historic period artifacts from seven discrete cultural resources loci. The prehistoric artifacts included wight pieces of lithic debitage that were derived from seven separate shovel tests; none of these lithic artifacts is culturally or temporally diagnostic. The historic materials included one whiteware ceramic sherd and a single piece of flat glass. None of the cultural resources produced sufficient cultural material to warrant archeological site status. The paucity of cultural materials, the absence of temporally and culturally diagnostic artifacts, and the lack of intact cultural deposits demonstrate that none of the seven cultural resources identified as a result of this investigation possesses the qualities of significance as defined by the National Register of Historic Places criteria for evaluation (36 CFR 60.4 [a-d]). Therefore, the proposed Thompson Creek Energy Center project will have no adverse effects on cultural resources within the project area that are listed on or eligible for the National Register of Historic Places. No additional testing of the proposed Thompson Creek Energy Facility is recommended.