

A dark blue silhouette of the state of Louisiana is centered on the page, set against a lighter blue circular background. The text is overlaid on this map.

Exhibit BB – SHPO Clearance Letter

Franklin Farm SHPO Clearance Letter



MITCHELL J. LANDRIEU
LIEUTENANT GOVERNOR

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

DAWN ROMERO WATSON
SECRETARY

PAM BREAUX
ASSISTANT SECRETARY

June 6, 2008

Mr. James Lauro
Archaeology Mississippi, Inc.
P.O. Box 4853
Jackson, MS 39296

Re: Revised Draft Reconnaissance CRM Report
LA Division of Archaeology Report No. 22-3040
*Revised Draft Reconnaissance Level Cultural
Resource Survey of 1,440 Acre Tract of Land for
a Proposed Industrial Development, Richland
Parish, Louisiana*
Archaeology Mississippi, Inc.

Dear Mr. Lauro:

We acknowledge the receipt of the above-referenced report, transmitted by letter dated April 24, 2008. We have completed our review of the report and offer the following comments.

The report documents the highly disturbed landscape of the project area from past demolition and land-leveling for agricultural purposes. Of the 33 tenant structures identified during map research, all but one house and one barn have been destroyed. The integrity of the sites identified has been highly compromised. Minimal archaeological evidence remains of the settlement of the project area by tenant farmers from a limited timeframe in history. We agree with your statement in the concluding chapter that the significance of these house sites lies more in their documentation as a group.

We concur, based on the ground disturbance of the project area and the results of the pedestrian survey and subsurface testing, that the proposed development of the 1,440-acre area in Richland Parish will not affect historic properties. The report submitted, however, will need some revision to meet the Louisiana Division of Archaeology report standards.

Please review the enclosed technical comments. We request that you submit two bound copies of the final report after addressing the comments and making adjustments, as appropriate. If you should have any questions please contact Stacie Palmer at the Division of Archaeology by email at spalmer@crt/state.la.us or by phone at 225-342-5737.

Sincerely,


Pam Breaux
State Historic Preservation Officer

PB:SP:s

Mr. James Lauro
June 6, 2008
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Enclosure: As Stated

Cc:

Ms. Mary Jo Hanover, CEcD
Business Development Services Coordinator
Louisiana Economic Development
P.O. Box 94185
Baton Rouge, LA 70804-9185

Mr. Randy Denmon
Denmon Engineering, Inc.
P.O. Box 8460
Monroe, LA 39296

Mr. Mike Goff
Wildlife Technical Services, Inc.
P.O. Box 820188
Vicksburg, MS 39182

Ms. Anne Woerner
Civil Engineer, Regulatory Branch
US Army Corp of Engineers
4155 Clay Street
Vicksburg, MS 39180-3435

Technical Comments:

1. Abstract – Summarize the report findings and recommendations. Please include the number of sites identified and the number of National Register of Historic Places (NRHP) eligible sites.
2. List of Figures and List of Tables – Include page numbers.
3. Introduction – Please explain in detail the land alterations that took place in the 1970's and 80's.
4. Introduction – What is the Federal involvement that initiated the Section 106 process?
5. Introduction – Include a description of the report organization.
6. Introduction – Include a description of the disposition (temporary and final) of the artifacts, field notes, photographs, and maps.
7. Introduction – Please discuss the choice of a reconnaissance survey as opposed to a Phase I survey. Include a justification on why this is an adequate survey to identify historic properties within the APE.
8. Culture History – This is a very lengthy chapter. It would be helpful to focus on the Franklin Plantation and tenant farming within the project area.
9. Culture History, page 30, paragraph 3, George Franklin Plantation - Do the following paragraphs refer to people that actually lived on the plantation as tenant farmers?
10. Culture History - Please include a chronology chart.
11. Culture History - Please consider including a transcription of the interview with Mr. Franklin in the report or as an appendix.
12. Culture History – Are there any historic photographs of the project area that could be included in the report?
13. Previous Investigations – Please discuss in the text all sites that are located within the Area of Potential Effects (APE) and within a one-mile radius of the APE.
14. Previous Investigations – Please include a map with the sites identified within a one-mile radius of the APE.
15. Field Methods – Include a description of the pedestrian survey (acres covered and transect interval).
16. Field Methods – Please include a description of the shovel testing (acres covered and transect and spacing interval).
17. Field Methods – Please describe how sites were mapped.
18. Field Methods – Include a description of the background research and list all documents, resources, and maps reviewed.
19. Archaeological Investigations – What was the goal of the survey?
20. Field Methods – Please discuss high and low probability areas within the APE and the choice of the field methodology. Include information on the acres of high and low probability.

21. General – Please review for typos and grammatical errors.
22. Table 3, page 10 – This should be labeled Table 2.
23. Table 3 – Please update table column for significance to NRHP Eligibility and state whether the site is Eligible, Not Eligible, Undetermined, or Potentially Eligible.
24. Chapter 5 – The text states that the 253 shovel test pits were excavated, but Figure 18 shows approximately 170 shovel test pits. Which is correct? Please modify either text or figure to reflect the actual number of shovel test pits excavated for this survey.
25. Chapter 7 - Please include site sketch maps within the report body, not in the appendix. Photographs of the site and associated artifacts should also be included.
26. General – If taken, please include project overview photographs in the report.
27. Site descriptions – Please include a date range and citation of the historic artifacts identified.
28. Site descriptions – Please state why each site and isolated find is not eligible for inclusion on the National Register of Historic Places (NRHP). Please discuss the criteria under which the site is being evaluated.
29. 16RI282 (Henbit Knoll Site) – The sketch map of the site shows that 3 shovel test pits were excavated, but not in the area of the artifact surface scatter. Is this correct?
30. 16RI283 – The site maps indicate that 4 shovel test pits were excavated, but the text states that 3 shovel test pits were excavated.
31. 16RI283 – The sketch map of site is a long oval shape, which is not consistent with the site dimensions stated in the text.
32. 16RI179 – Please check field notes and determine if shovel test 2 was positive or if all shovel tests were negative.
33. General – When referring to field visit dates, please include year.
34. 16RI179 – The original site form describes this site as a tenant house scatter with a house near the road. The report states that on the 1943, 1958, 1966, and 1978 maps that there was a large complex of structures. Could the location of the original site have been destroyed and what was found was related to one of the other structures of the complex? What was the original complex of structures? Were they multiple tenant houses, a farm complex? Is a large complex of structures typical of tenant farm sites?
35. 16RI179 – Please contact Cheraki Williams, at the Division of Archaeology to correct the map location of this site.
36. 16RI284 – Is there any archaeological evidence of the structure or is it only evident on the map?
37. 16RI285 – Was the “main occupation area” subject to shovel test pit excavation?
38. 16RI286 – Was there any indication on the combine of the year and make? Please discuss the possible age of the remnants of the structure.

39. General – “site remnant” - does this mean the site was destroyed or is it the remnants of the abandoned house site?
40. 16RI287 – Why wasn't this site subject to surface collection and subsurface testing?
41. 16RI290 – Please describe the “pronounced knoll” in detail.
42. General – Include representative shovel test pit profiles for each site tested.
43. Isolated Find 11 – Why is this number 11? Were there other isolated finds?
44. Isolated Find 11 – Please give the reason there were no shovel test pits excavated in this area.
45. Isolated Find 11 – Please explain, “appears to be essentially destroyed.”
46. Page 68 – What were the 1858 maps that were reviewed?
47. Page 70, paragraph 2 – Please indicate the date of the prehistoric component of site 16RI283.
48. Figure 29 and Table 3 – These should be in the results chapter.
49. Table 3 – Please correspond the sites with identified structures. This should also be included in the text description of the sites.
50. Appendix B Plan for Additional Investigations – This should be included in the body of the report under Summary and Recommendations.