



DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, NEW ORLEANS DISTRICT
7400 LEAKE AVE
NEW ORLEANS LA 70118-3651

September 22, 2023

Regulatory Division
Eastern Evaluation Branch
Attn: CEMVN- RGE

Kristin Sanders, SHPO
LA State Historic Preservation Officer
P.O. Box 44247
Baton Rouge, LA 70804-4241

RE: Section 106 Review Consultation

Undertaking: Construction of Greenfield Louisiana Grain Terminal Permit,
Saint John the Baptist Parish, Wallace, Louisiana.
Regulatory Permit Application # MVN 2014-01518-2 EMM

Determination: Adverse Effects on Historic Properties

Dear Ms. Sanders:

The U.S. Army Corps of Engineers, New Orleans District (CEMVN) Regulatory Division has received a permit application from Ramboll Inc. (Agent) on behalf of Greenfield Holdings, LLC. (Applicant) for a proposed project in Saint John the Baptist Parish, Wallace, Louisiana. On September 13, 2023, CEMVN received the enclosed Draft Report entitled, "*Revised Addendum 1: New Additions to the Phase I Archaeological Investigation of the Greenfield Development on Robert Brothers Farm Site St. John the Baptist Parish, Louisiana*" prepared by Gulf South Research Corporation (GSRC) (**Enclosure 1**). This report provides an update to a previous Phase I cultural resource survey report entitled "*Addendum 1: New Additions to the Phase I Archaeological Investigation of the Greenfield Development on Robert Brothers Farm Site St. John the Baptist Parish, Louisiana*", prepared by GSRC and submitted to CEMVN in February 2022. This report provides a summary of archaeological and built environment surveys.

In partial fulfillment of CEMVN's responsibilities under Executive Order 13175, the National Environmental Policy Act (NEPA), as amended (42 U.S.C. § 4321 et seq.), Section 106 of the National Historic Preservation Act (NHPA), as amended (54 U.S.C. § 306108), and its implementing regulations, 36 Code of Federal Regulations [CFR] Part 800, and Section 110(f) of the NHPA (54 U.S.C. § 306107) and 36 C.F.R § 800.10 of the Section 106 implementing regulations. CEMVN offers you the opportunity to review and comment on the potential of the proposed action described in this letter to affect historic properties. Additionally, in accordance with the of responsibilities of Executive Order 13175, CEMVN offers Federally-recognized Tribes the opportunity to review and comment on the potential of the proposed undertaking described in this letter to significantly affect protected tribal resources, tribal rights, or tribal lands.

Authorities

CEMVN has Section 404 of the Clean Water Act (Section 404) and Section 10 of the Rivers and Harbors Appropriations Act (Section 10), and Section 14 of the of the Rivers and Harbors Appropriations Act (Section 408) authorities and is conducting a combined review of the individual permit request (Project ID # MVN 2014-01518-2 EMM) in accordance with 33 CFR Part 325, "*Appendix C*," and the associated Section 408 permission requests (Project ID # 21-0221) in accordance with Engineering Circular 1165-2-220; September 10, 2018. In this case, "combined" means that the actions under the Section 408 jurisdiction are a smaller component of an individual Section 10/404 Permit and the resulting joint Area of Potential Effects (APE) represents both the Section 10/404 "Regulatory Permit Area" and the Section 408 permission "Environmental Analysis Areas."

Description of the Undertaking

The Greenfield Project (Undertaking) project area is located within the town of Wallace, on the right descending bank of the Mississippi River, River Mile 145, in Saint John the Baptist Parish, Louisiana (**Figure 1**). The approximate geographic coordinates are: 30.041147; -90.661738. A 7.5' USGS map of the undertaking location is presented in **Figure 2**. Plans for the proposed project are available in **Enclosure 2**.

The proposed project includes the construction of a 222-acre grain terminal situated on a 1,362-acre property, connecting from the Mississippi River to the existing Union Pacific Railroad (UPRR) line. The proposed terminal will receive and export grain byproducts and will include barge, rail, and truck receiving systems/transfer facilities, a grain drying system, a grain cleaning system, storage bins, and a ship loading system. The proposed terminal will include a ship and barge dock facility, grain conveyance and storage facilities. The overall site plan includes a conveyor belt system from the dock on the Mississippi River to the terminal, equipment for a bulk weighing tower, a grain cleaning building, screening bins, and drying equipment, storage silos, a guard shack and office/administration building, a maintenance building, a FGIS/control room building, a rail/truck receiving building, include laydown and staging areas, a water storage tank and a fire pump house, and inbound and outbound truck scales.

The dock will be approximately 1,138 feet in length, with the placement of the dock ship fender line approximately 640 feet from center of the Mississippi River Levee (MRL). The dock will house a barge unloader and three ship loaders that will transfer grain through a conveyor system over the levee to and from storage onsite. Grain will also enter and leave the facility through truck loading/unloading systems and by rail, with a connection to the UPRR line on the southern portion of the site and a rail loop system to be located adjacent the southeastern portion of the terminal.

Summary of Section 106 Review Process To Date

Per 36 CFR 800.2 (a-d), CEMVN identified the Advisory Council on Historic Preservation (ACHP), the Louisiana State Historic Preservation Officer (SHPO) and staff, and Federally Recognized Tribes with an interest in this part of Louisiana, who all have consultative roles in the Section 106 process. No representatives of local governments were identified at initiation of the Section 106 process. CEMVN identified the National Park Service (NPS) as a consulting party in accordance with 36 CFR § 800.10 based on the National Historic Landmark (NHL) status of the adjacent Evergreen Plantation. In response to the two Joint Public Notices published on 29 November 2021 and 14 March 2022 and other correspondence/discussions, CEMVN also considered individuals and organizations that demonstrated an interest in the undertaking as consulting parties.

CEMVN initiated the Section 106 of the NHPA process for the permit application in an email dated 10 August 2022 and invited Consulting Parties to the initial Consultation Meeting. As of September 2023, CEMVN has held five Consulting Party meetings. **Enclosure 3, Table 1** provides a summary of the steps taking in the consultation process (Action). These actions are arranged chronologically, and tied to the portion of the regulations they are intended to fulfill.

Area of Potential Effects (APE)

CEMVN developed three Areas of Potential Effect (APE) to aid in analyzing the effects of the proposed undertaking. CEMVN distributed Draft APEs to Consulting Parties for comment on 30 January 2023. The 24 March 2023 Consulting Parties meeting discussed the APEs, and, based on this discussion and comments submitted in writing, CEMVN required the Applicant to undergo additional analyses. The Applicant conducted an additional air emissions analysis, traffic impact analysis, noise analysis, and a nighttime lighting analysis. After receipt and distribution of these studies to the Consulting Parties, the 23 June 2023 Consulting Parties meeting discussed the analysis with respect to the proposed APEs. Based on the meeting comments, as well as written comments, CEMVN defined the APEs and distributed a justification memorandum on 1 August 2023 (**Enclosure 2**). The areas include the Ground Disturbance APE, the Architecture/Operations APE, and the Cumulative APE.

Ground Disturbance APE

The APE spans approximately 222 acres and is defined by the shape of the project's design and footprint (**Figure 3**). The APE extends from the proposed dock within the Mississippi River, across the Mississippi River Levee, and south into the town of Wallace until it terminates at the Union Pacific Rail Road (UPRR) line. This APE consists of all areas potentially impacted by any ground-disturbing activities associated with the construction and operation of the proposed project (e.g., facility buildings/structures, dock, temporary/permanent staging areas, machinery, roads, and railroad lines).

Architecture/Operations APE

The APE forms a 1.5-mile-wide buffer around the shape of the project footprint, then extends east along State Highway LA-18 (River Road) and is bounded by the north-south running State Highway LA-640 (**Figure 3**). The southern APE boundary is State Highway LA-3127 and extends west from the intersection with LA-640 to the intersection of State Highway LA-3213. This APE captures the geographic area where facility operations may result in visual, noise, vibration, and direct traffic-related effects to historic properties. Impact analyses considered in the development of this APE include the viewshed analysis, air emissions memo, environmental noise analysis, nighttime lighting analysis, and traffic analysis. Consulting Parties' comments, specifically parties that live and work along River Road, were critical to this APE boundary definition.

Cumulative APE

This approximately 17-mile-wide APE is rectangular shaped and roughly spans the portion of land between Vacherie and Bonnet Carre Point flanked by River Road and LA-3127 (**Figure 3**). The APE extends east along River Road from Oak Alley Plantation, envelops the Architecture/Operations APE, and continues east to the curve of River Road at Bonnet Carre Point. The APE continues along River Road and connects to LA-3127 through a major alignment of agricultural parcels' termini. LA-3127 defines the APE's southern border, following the road's contours. The APE then envelops the southern portion of the Architecture/Operations APE, is constricted to the UPRR line, and terminates at the Oak Alley Plantation parcel boundary. This APE captures the area of all impacts, which may be geographically removed from the project or be cumulative in time. Consulting Parties' input, and webpage information aided this APE boundary definition.

Historic Property Identification and Evaluation Efforts

The enclosed Revised Addendum 1 report provides an update to a previous Phase I cultural resource survey report entitled "*Addendum 1: New Additions to the Phase I Archaeological Investigation of the Greenfield Development on Robert Brothers Farm Site St. John the Baptist Parish, Louisiana*", conducted by GSRC and submitted to the Louisiana State Historic Office's (SHPO) Division of Archaeology (LADOA) (Report # 22-6636-1). The Addendum 1 report provided additional field investigations based upon a change to the project's design/footprint as well as comments from the Louisiana SHPO after their review of the initial Phase I archaeological investigation entitled "*Phase I Archaeological Investigation of the Greenfield Development on Roberts Brothers' Farm in St. John the Baptist Parish, Louisiana*" (LADOA Report # 22-6636), conducted by GSRC and submitted in January 2021. It is important to note that while the enclosed report provides a comprehensive built environment survey (that is, including the results of the previous reporting efforts), it does not present archaeological findings presented in the initial Phase I archaeological report (LADOA Report # 22-6636). This letter addresses the comprehensive archaeological findings associated with this permit application and will denote if the survey findings associated with an

archaeological resource are found in the initial Phase I archaeological report (LADOA Report # 22-6636).

In accordance with Section 106 regulations, the lead Federal agency is responsible for identifying historic properties within the APE. Historic properties are defined as “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (NRHP) maintained by the Secretary of the Interior” per 36 CFR 800.16(l). To support the identification of historic properties within the APE, GSRC has provided cultural resources survey reports that detail the results of multiple investigations within the APE. CEMVN staff also conducted background and literature review that included review of the NRHP database, the Louisiana Cultural Resources Map, historic map and aerial research, and a review of previous cultural resources survey reports. Additionally, the agency has taken into consideration information provided by the Consulting Parties regarding historic properties. This data was evaluated by CEMVN using the NRHP Criteria.

Archaeology

GSRC surveyed and evaluated a total of five (5) archaeological sites, four of which are located within the Ground Disturbance APE. GSRC revisited only one previously recorded site, the Mialaret Mill Site (16SJB57), which was recommended ineligible for listing in the NRHP. Although GSRC’s investigations expanded the site boundary, they recommended the site ineligible for NRHP listing; CEMVN determines this site ineligible for NRHP listing under Criterion D. GSRC recorded three new archaeological sites, the Horn Mill Site (16SJB73), the Willow Grove Cemetery (16SJB75), and the Raised Berm Site (16SJB78). GSRC recommended the Horn Mill Site (presented in LADOA Report # 22-6636) and the Raised Berm Site ineligible for NRHP listing; CEMVN determines these sites ineligible for NRHP listing under Criterion D. GSRC recommended the Willow Grove Cemetery eligible under Criterion A, but ineligible under Criterion D. CEMVN determines this site ineligible for NRHP listing under Criterion D, and eligible under Criterion A. Last, in the initial Phase I report (LADOA Report # 22-6636), GSRC recorded Site 16SJB74 and recommended the site as undetermined for NRHP listing pending further investigation and evaluation based upon the presence of intact brick features and the potential for additional intact archaeological deposits. However, due to a change to the project’s design and therefore footprint, this site is no longer within the Ground Disturbance APE and will not be affected by the proposed project. Should another project potential affect Site 16SJB74, CEMVN recommends additional investigations during the identification phase of the project to determine NRHP eligibility of the archaeological deposits contained within the bounds of the site.

Built Resources

GSRC surveyed and evaluated a total of 158 built resources 50 years of age or older within the Architecture/Operations and Cumulative APE. A segment of the Union Pacific Railroad (UPRR), formerly known as the Texas and New Orleans Railroad (T&NO), was surveyed and evaluated for NRHP eligibility. The UPRR is significant

under Criterion A for its association with agricultural production in the region. The segment within the APE was altered ca. 1980, thus no longer retains the character-defining features of a historic railroad line. While the UPRR is eligible in its entirety for listing in the NRHP, the portion located within the APE is a non-contributing segment.

This investigation included the survey and NRHP evaluation of the community of Wallace as a National Register Historic District (NRHD). The community consists of mostly residential buildings with some commercial, religious, public, agricultural, and transportation facilities. A total of 334 resources, including Evergreen Plantation NHL and Whitney Plantation NRHD, are located within Wallace. Wallace meets the qualifications for significance under Criterion A in the area of Social History, Ethnic/Cultural Heritage, and Community Development and Planning for its association with the African American experience in Louisiana and as a post-bellum African American community. Only 52 resources of the 334 surveyed would be contributing to a district. According to NRHP Bulletin, *How to Apply the National Register Criteria for Evaluation* (NRB 16A), "For a district to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished" (NPS 1995, 46). Although the community of Wallace possesses significance, it retains insufficient integrity of design, materials, workmanship, and association. Wallace, as a whole, no longer retains integrity to convey its significance. As a result, the community is not eligible for listing in the NRHP.

CEMVN has determined that there are 20 historic properties as defined in 36 CFR 800.16(l) within the Architecture/Operations and Cumulative APE. These historic properties include two (2) NHLs, two (2) NRHP listed NRHDs, eight (8) individually NRHP listed buildings, one NRHP eligible NRHD, two NRHP eligible cemeteries, and five individually NRHP eligible buildings. These historic properties are described below and found in Enclosure 3, Table 2.

Descriptions of identified historic properties start with the east bank of the Mississippi River and are followed with historic properties situated along the west bank of the Mississippi River from west to east.

Colonial Sugars NRHD – 1250 S. Fifth St.

The Colonial Sugars Historic District, listed in the NRHP in 1994, is located in Gramercy, St. James Parish, on the east bank of the Mississippi River. The district is significant in the area of Industry on the national level because of its sugar processing component and on the state level in the area of Industry as a rare surviving company town founded in 1895. The period of significance for the district is 1895 to 1944. At the time of the nomination, the district had 46 contributing resources. Most of these resources were constructed between 1895 and 1920. The well-known New York

architectural firm McKim, Mead & White designed the three-story, brick, Beaux-Arts powerhouse, which is the most significant building within the district.

Great River Road NRHD

The Great River Road NRHD is eligible for listing in the NRHP under Criterion A in the areas of Early Exploration and Settlement, Community Development and Planning, Social History, Industry, Agriculture, Land Usage, and Cultural/Ethnic Heritage for its association with settlement along River Road, development of sugar plantations and agriculture, the history of slavery in Louisiana, and descendent communities. The district has a predominantly agricultural landscape that spans 300 years. The period of significance for the district begins ca. 1720s and ends 1973. The Great River Road NRHD shares a portion of the boundaries for the State-certified River Road Cultural District and the local Parish-designated River Road Historic District but is independent of either of those districts. The boundary for the Great River Road NRHD is reflected in **Figure 4** and spans approximately 18 miles along River Road. The district is bounded by Oak Alley Plantation NHL to the west and the Sorapuru House to the east. The district consists of eight (8) listed NRHP buildings, two (2) NHLs, one (1) NRHD, five (5) NRHP individually eligible buildings, two (2) NRHP eligible cemeteries, 43 contributing buildings, and the rural landscape of this portion of St. John the Baptist Parish and St. James Parish (see Enclosure 3, Table 3 for current listing of properties).

Oak Alley Plantation National Historic Landmark (NHL) – 3645 LA-18

Oak Alley Plantation, listed in the NRHP in 1974, was designated a NHL in 1975 for its agriculture, architecture, and landscape architecture at the national level. The historic Greek Revival plantation house is named after its distinctive 800 ft long allée of 28 live oak trees that stretch from the river to the building. Oak Alley features a central hall, gallery supported by 28 two-story colossal Doric columns, hipped roof with three (3) gabled dormers. The period of significance is 1837 to 1839, its estimated date of construction.

St. Joseph Plantation – 3535 LA-18

St. Joseph Plantation House was listed in the NRHP in 2005. The property consists of two contributing buildings, the main house and wood frame shed. St. Joseph Plantation is significant at the state level in the area of Architecture because it is a rare surviving example of a raised large antebellum plantation home with a central hallway, which illustrates the Anglo-American influence on the Creole building tradition. St. Joseph Plantation meets the registration requirements of the *Louisiana's French Creole Architecture* Multiple Property Documentation Form. The period of significance is ca. 1840, its estimated date of construction. The large, raised plantation home exhibits many of the characteristic elements of the French Creole style, such as the hipped

umbrella roof, briquette-entre-poteaux upper floor walls, French doors, and rear cabinet/loggia range.

Felicity Plantation – 3351 LA-18

Felicity Plantation was listed in the NRHP in 2010. The building is significant at the state level under Architecture as it is a rare surviving example of a large Greek Revival antebellum plantation home with French Creole influences. The period of significance is ca. 1846, its estimated date of construction. Felicity Plantation meets the registration requirements of the *Louisiana's French Creole Architecture* Multiple Property Documentation Form.

Laura Plantation – 2247 LA-18

Laura Plantation was listed in the NRHP in 1993. The complex is located in St. James Parish and consists of a large raised French Creole plantation house and 16 dependencies that include a row of six cabins. The rare, raised Creole plantation house and historic plantation complex are significant at the state level in the area of Architecture. Laura Plantation also is significant at the state level in the area of Agriculture as a rare surviving historic plantation complex. The period of significance under Architecture is ca. 1820, the date of construction for the main plantation house, while the period of significance under Agriculture is 1820 to 1942.

Cazenave Motor Company – 1205 LA-18

The Cazenave Motor Company was constructed ca. 1925. A 2015 *Times-Picayune* article mentions Etienne Victor Cazenave, Sr. moved his one-car garage business to Vacherie after constructing the “iconic, long leaf pine and red brick building” along River Road (*Times-Picayune* 2015). The building features a strong stepped parapet at the façade with large display windows that likely provided full views of automobiles once showcased within the building. A photo from the Facebook page of Cazenave Motor Company shows a filling station originally was located just outside the main entrance. Since construction, the original wood window lights have been replaced, the original signage also has been replaced, and a metal roof installed. However, the building still maintains its character-defining features of an early twentieth century automobile dealership and reflects its association with the growing automotive industry of the period. The Cazenave Motor Company is eligible for listing in the NRHP under Criterion A for local commerce and Criterion C for architecture.

St. Philip Catholic Church – 1175 LA-18

The ca. 1921 St. Philip Catholic Church (47-00008) is located in Vacherie, St. James Parish. The wood-frame and clad church was constructed during the Eclectic movement and features Colonial Revival elements. The ca. 1927 St. Philip Church Hall

(47-00009) and cemetery also are situated within the property. Surveyor P. Leslie evaluated both religious resources in June 1985; the NRHP eligibility for the church was noted on the survey form as “possible”. The St. Philip Catholic Church and its associated resources are eligible for listing in the NRHP under Criterion C for Architecture as excellent examples of ecclesiastical buildings constructed during the Eclectic movement. The St. Philip Catholic Church also is eligible under Criterion A for its association with the development of Vacherie.

5939 LA-18

The French Creole cottage located at 5939 LA-18 is eligible for listing in the NRHP. The one-and-a-half story, frame building exhibits many elements of the style, such as its raised brick foundation, high side gables, central chimney, and two bay façade. The small Creole cottage is locally significant in the area of Architecture as a rare surviving example of a small French Creole cottage within St. John the Baptist Parish. The property meets the registration requirements of the *Louisiana’s French Creole Architecture* Multiple Property Documentation Form.

Woodville Cemetery – 176 Woodville Dr

Woodville Cemetery was constructed ca. 1890. The Woodville Benevolent Association, an African American social aid and charitable organization founded in 1892, owns and manages the cemetery. Benevolent societies assured that members had proper burials and often financed tomb construction. The Woodville Cemetery also holds the remains of United States Veterans who served in every war from World War I to Vietnam. The cemetery is eligible under Criterion A in the area of Social History and Cultural/Ethnic Heritage for its association with the history of slavery and the ancestry of formerly enslaved peoples in the Wallace area. The cemetery also is eligible for its association with the Woodville Benevolent Society. Cemeteries are listed as an associated property type under H. Social in *The African American Experience in Louisiana* historic context.

Willow Grove Cemetery – End of W 5th St

The Willow Grove Cemetery is a small, community-run cemetery that has been active at least since 1919, the date of the earliest marked burial. The cemetery is associated with the Willow Grove Benevolent Society, an African American social aid and charitable organization that assured members had proper burials and often financed tomb construction. Willow Grove Cemetery is eligible under Criterion A in the area of Social History and Cultural/Ethnic Heritage for its association with the history of slavery and the ancestry of formerly enslaved peoples in the Wallace area. The cemetery also is eligible for its association with the Willow Grove Benevolent Society.

Cemeteries are listed as an associated property type under H. Social in *The African American Experience in Louisiana* historic context.

Whitney Plantation NRHD – 5099 LA-18

The Whitney Plantation Historic District was listed in the NRHP in 1992. The NRHD has four areas of significance: architecture, art, agriculture, and archaeology. The rare, raised Creole plantation house with Norman roof truss and historic plantation complex are significant at the state level. The surviving exterior loggia wall paintings are significant at the national level, while the three archaeological sites within the district are significant at the state level. The period of significance for Whitney Plantation is 1750 to 1942.

The National Register nomination states that the Main House (Building #1; 48-00233/48-01106) is “eminently eligible for National Register listing” (LA DHP 1992:Section 7, Page 12), and the French Creole Barn (Building #15; 48-00234), Plantation Store (Building #24; 48-00232), and Pigeonnier (Building #23) (48-04746) “should also be noted in any assessment of Whitney. Each of these buildings is individually eligible for Register listing due to its rarity” (LA DHP 1992:Section 8, Page 3). The Main House, French Creole Barn and Plantation Store were surveyed as in “excellent condition” and with “excellent integrity”. The Pigeonnier, one of only 18 extant in Louisiana at the time of the nomination, was surveyed in “good condition and with good integrity.”

The district’s integrity of setting has diminished due to restoration efforts to become a museum. Many historic outbuildings were added to Whitney Plantation since the property was listed in the NRHP. While these resources help to recreate a more authentic visitor experience of a Louisiana working plantation, the buildings are not original to the property. The remaining slave cabins are in good condition but were moved from nearby plantations to the site ca. 2006 per Google Earth historical imagery. Additionally, commissioned artwork and powerful memorials, such as the Pensiton Disc called “Middle Passage”, Field of Angels, Wall of Honor, and the Allées Gwendolyn Midlo Hall that consists of approximately 14 artwork components were added to the complex after 2009 (NETR 2010).

As a result of these changes to the Whitney Plantation property, CEMVN recommends a boundary decrease to the existing district that removes these developed areas. The proposed boundary decrease shown in **Figure 5** would eliminate modern and moved resources located along the south and southwestern periphery of the property, such as the ca. 2009 Welcome Center and adjacent surface parking area, large one-story prefabricated storage unit added to the southeastern portion of the complex ca. 2010, relocated slave cabins, and recent memorial section. No presently

contributing resources are proposed for removal from the existing NRHD. The proposed boundary decrease is consistent with the Guidelines for Selecting Boundaries found in National Register Bulletin 16A.

Evergreen Plantation NHL – 4677 LA-18

Evergreen Plantation, listed in the NRHP in 1991, was designated an NHL in 1992 for its agriculture at the national level and architecture at the state level. The property was designated a NHL under Criterion 1 and 4 under NHL Theme XI. Agriculture, B. Plantation Agriculture (1607-1860). At the time of its designation over 30 years ago, Evergreen Plantation was one of eight extant Greek Revival plantation buildings situated along the Great River Road. Evergreen Plantation is the largest and most intact plantation in the South. A total of 37 contributing buildings, which include the ca. 1832 Greek Revival main house with Federal elements, various dependencies, and a double row of 22 nearly identical cabins constructed for people once enslaved at the plantation, are situated within the historic 575-acre NHL boundary. The period of significance for Evergreen Plantation is 1832 to 1930.

Bacas House – 4315 LA-18

The Bacas House was listed in the NRHP in 1990. The one-story French Creole house is locally significant under Architecture within St. John the Baptist Parish as a rare example of a Creole house with transitional Anglo-Creole style. The period of significance is 1840 to 1850.

3597 LA-18

The French Creole cottage located at 3597 LA-18 is eligible for listing in the NRHP. The one-and-a-half story, frame building exhibits many elements of the style, such as its raised brick foundation, side-table roof, integral porch, and board-and-batten shutters on openings. The small Creole cottage is locally significant in the area of Architecture as a rare surviving example of a small French Creole cottage within St. John the Baptist Parish. The property meets the registration requirements of the *Louisiana's French Creole Architecture* Multiple Property Documentation Form.

Dugas House – 3581 LA-18

The Dugas House was listed in the NRHP in 1989. The one-story French Colonial cottage with Creole architectural elements is locally significant within St. John the Baptist Parish in the area of Architecture. The period of significance is 1810-1820.

E.J. Caire & Co. Stores – 2403-2407 LA-18

The E.J. Caire & Co. Stores were listed in the NRHP in 2001. The property consists of two rural store buildings located in the former Caire's Landing in Edgard. The ca.

1855 two-story, brick Greek Revival Store and the ca. 1897 store with clapboard siding and a seven bay gallery are locally significant within St. John the Baptist Parish in the area of Commerce as the buildings are rare surviving examples of rural stores. The period of significance is 1855 to 1940.

As noted in the survey results, the ca. 1855 building (48-00139) has experienced a significant amount of damage to the roof. The structure of the gable roof with parapet has collapsed likely due to Hurricane Ida that made a direct hit to the area in late August 2021. The façade parapet and raking cornice, character-defining features, no longer are extant. The original lettering of “Caire’s Landing” also is no longer present. As a result of these changes, the ca. 1855 building no longer is contributing to the property as the building retains insufficient integrity of design, materials, and workmanship. The building no longer retains integrity to convey its significance.

St. John the Baptist Catholic Church, Rectory, and Cemetery – 2349 LA-18

The St. John the Baptist Catholic Church was constructed ca. 1920 and replaced two previous churches, a ca. 1822 church that was destroyed by fire in 1918 and a ca. 1724 chapel that was swept away in 1821 by the Poche crevasse that flooded the entire west side of St. John the Baptist Parish. Bells salvaged from the ca. 1822 church are present in the current bell tower. According to the church website, Favrot & Livaudais, an architectural firm in New Orleans, designed the church in the Renaissance Revival style. The rectory exhibits elements of the Classical Revival style. The St. John the Baptist Cemetery is one of the oldest in the state and was established ca. 1770. The St. John the Baptist Church and Rectory are eligible for listing in the NRHP under Criterion C for Architecture as excellent examples of the Renaissance and Classical Revival styles. The St. John the Baptist Cemetery also is eligible under Criterion A for its association with the development of Edgard.

Haydel-Jones House – 2245 LA-18

The Haydel-Jones House was listed in the NRHP in 2010. The property consists of two contributing buildings, the main house and a smaller worker’s house. The Haydel-Jones House is significant at the state level under Criterion C for Architecture as a rare example of a raised French Creole plantation house and meets the registration requirements of the *Louisiana’s French Creole Architecture* Multiple Property Documentation Form. The period of significance is ca. 1815, its estimated date of construction. The raised plantation exhibits many of the characteristic elements of the French Creole style, such as the hall-less floor plan, Bousillage walls, full length front gallery and rear cabinet/loggia range.

Sorapuru House – 971 LA-18

The Sorapuru House was listed in the NRHP in 1999. The one-story, frame French Creole cottage is situated within Lucy in St. John the Baptist Parish. The Sorapuru House is locally significant in the area of Architecture as a rare example of French Creole style and meets the registration requirements of the *Louisiana's French Creole Architecture* Multiple Property Documentation Form. The building also features rare Federal style mantels that contribute to its significance. The period of significance is ca. 1825, its estimated date of construction.

The ca. 1825 building has experienced damage to the southeast corner of the building. The structure of the side-gable roof has collapsed likely due to a fallen tree from Hurricane Ida, which made a direct hit to the area in late August 2021. The porch, railing, and two columns on the southeast corner also were damaged. Although this corner of the building has experienced diminished integrity of materials, the remaining elevations still have intact materials that convey its significance.

Assessment of Effects to Historic Properties

As presented in this letter, CEMVN has determined that there are a total of 20 historic properties, as defined in 36 CFR 800.16(l) within the APEs. There are no historic properties within the Ground Disturbance APE; there are 12 historic properties in the Architecture/Operations APE and 8 properties in Cumulative APE. These historic properties include two (2) NHLs, two (2) NRHP listed NRHDs, eight (8) individually NRHP listed buildings, one (1) NRHP eligible NRHD, two (2) NRHP eligible cemeteries, and five (5) individually NRHP eligible buildings.

CEMVN, in consultation with SHPO/THPO, is responsible for applying the Criteria of Adverse Effect to historic properties within the APE to determine whether an undertaking may have an adverse effect. The Criteria of Adverse Effect as defined in 36 CFR 800.5(a)(1) states that:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Adverse Effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

According to 36 CFR 800.5(a)(2), Adverse Effects on historic properties include, but are not limited to:

- i. Physical destruction of or damage to all or part of the property;

- ii. Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines;
- iii. Removal of the property from its historic location;
- iv. Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- v. Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;
- vi. Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- vii. Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

CEMVN evaluates effects and makes one of three determinations: **No Historic Properties Affected/No Effect**, **No Adverse Effect**, or **Adverse Effect**.

No Historic Properties Affected/No Effect: A finding of "no historic properties affected" per 36 CFR 800.4(d)(1) indicates that the undertaking would not affect historic properties, whether from direct, indirect, or cumulative effects.

No Adverse Effect: A finding of "no adverse effect" per 36 CFR 800.5(b) indicates that an effect would not alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

Adverse Effect: A finding of "adverse effect" per 36 CFR 800.5(a)(1) indicates that an effect would alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

In addition, due to the presence of National Historic Landmarks within the APEs, CEMVN is responsible for complying with Section 110(f) of the NHPA (54 U.S.C. § 306107) and 36 C.F.R § 800.10 "Special Requirements for protecting National Historic Landmarks":

Section 110(f) of the act requires that the agency official, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking. When commenting on such undertakings, the Council shall use

the process set forth in §§ 800.6 through 800.7 and give special consideration to protecting National Historic Landmarks as specified in this section.

CEMVN assessed the effects of the undertaking to the 20 historic properties within the APE. Based on the results presented by GSRC (2023), CEMVN has determined that the proposed undertaking will result in No Effect to three (3) historic properties, No Adverse Effect to twelve (12) historic properties, and an Adverse Effect to five (5) historic properties within the APE. The following section details the assessment of effects for each of the 20 historic properties identified. These effects also are presented in Enclosure 3, Table 4.

Similarly to the preceding Identification section, the assessment of effects to historic properties start with the east bank of the Mississippi River and are followed with historic properties situated along the west bank of the Mississippi River from west to east.

Effects Evaluations

Colonial Sugars NRHD – 1250 S. Fifth St.

The Colonial Sugars NRHD is located on the east bank of the Mississippi River. The undertaking will have no effect to the visual setting of the property as there are no direct lines of sight to the proposed project. Noise, vibration, and traffic-related impacts from the project's construction and operation also will not affect the NRHD.

Based on this evaluation, the undertaking will have **No Effect** on the Colonial Sugars NRHD.

Great River Road NRHD

The undertaking will span the district and create a new introduction to the viewshed of the Great River Road NRHD, which represents a change of use and will directly affect the setting and feeling of the district. Traffic and vibratory impacts from the project's construction and operation also will affect the historic property as the undertaking spans the central portion of the NRHD. The district is significant for its distinct landscape and associated built resources defined by their relationship with the river. The Great River Road NRHD retains all seven (7) aspects of integrity with setting considered most important to understanding its significance. The introduction of a large facility in the central section of the district will diminish all seven (7) aspects of integrity, most notably setting, and detract from the agricultural character of the district.

Based on this evaluation, the undertaking will have an **Adverse Effect** on the Great River Road NRHD.

Oak Alley Plantation NHL – 3645 LA-18

The Oak Alley Plantation NHL is open to the public and uses tourism revenue to fund the maintenance and preservation of the property. While having its own identity in heritage tourism, Oak Alley is packaged with Whitney, St. Joseph & Felicity, and Laura plantations into a singular heritage tourism experience by Louisiana's Office of Tourism. Additional input from Consulting Parties, specifically Whitney Plantation's director, demonstrated a distinct economic link between these plantations, as well as their reliance on the Great River Road (LA-18) to provide access for tourist transportation. Based on the enclosed report, and information provided throughout Section 106 Consultation, construction-related traffic impacts have the potential to adversely impact tourism traffic and the existing Great River Road heritage tourism economy. It is this economy that allows Oak Alley to maintain the materials and workmanship at this NHL. That is, the materials and workmanship aspects of integrity could indirectly be affected later in time or cumulatively by this Undertaking. The National Historic Preservation Act in its implementing regulations (Section 110 (f) /36 C.F.R § 800.10) require an Agency to the maximum extent possible take all planning steps necessary to minimize harm to any NHL that will be directly and adversely affected by the undertaking. The fact that the potential impacts would not occur until later in time (i.e., be cumulative) is consistent with the criteria of adverse effect and the planning standard necessary when evaluating potential effects to NHLs. CEMVN must consider future affects to the historic property resulting from the permit issuance as potentially cumulative adverse effects to the property's areas of national significance (i.e., architecture, agriculture, and landscape architecture). However, importantly, the long-term economic impacts, the driver of the physical effects of the project on the Oak Alley Plantation NHL is fully understood at this time.

Based on this evaluation and given the high standards of Section 110 (f) and 36 C.F.R § 800.10, the undertaking will have an **Adverse Effect** on the Oak Alley Plantation NHL.

St. Joseph Plantation – 3535 LA-18

St. Joseph Plantation is packaged with other plantations along River Road into a singular heritage tourism experience by Louisiana's Office of Tourism. Additional input from Consulting Parties, specifically Whitney Plantation's director, demonstrated a distinct economic link between these plantations, as well as their reliance on the Great River Road (LA-18) to provide access for tourist transportation. Construction-related traffic impacts have the potential to adversely impact tourism traffic and the existing Great River Road heritage tourism economy, which have the foreseeable potential to cause economic hardships to St. Joseph Plantation, causing potential adverse effects later in time (i.e., cumulatively). However, these potential cumulative effects will not rise to the level of adverse for St. Joseph Plantation.

Based on this evaluation, the undertaking will have **No Adverse Effect** on St. Joseph Plantation.

Felicity Plantation – 3351 LA-18

Felicity Plantation is packaged with other plantations along River Road into a singular heritage tourism experience by Louisiana's Office of Tourism. Additional input from Consulting Parties, specifically Whitney Plantation's director, demonstrated a distinct economic link between these plantations, as well as their reliance on the Great River Road (LA-18) to provide access for tourist transportation. Construction-related traffic impacts have the potential to adversely impact tourism traffic and the existing Great River Road heritage tourism economy, which have the foreseeable potential to cause economic hardships to Felicity Plantation, causing potential adverse effects later in time (i.e., cumulatively). However, these potential cumulative effects will not rise to the level of adverse for Felicity Plantation.

Based on this evaluation, the undertaking will have **No Adverse Effect** on Felicity Plantation.

Laura Plantation – 2247 LA-18

Laura Plantation is packaged with other plantations along River Road into a singular heritage tourism experience by Louisiana's Office of Tourism. Additional input from Consulting Parties, specifically Whitney Plantation's director, demonstrated a distinct economic link between these plantations, as well as their reliance on the Great River Road (LA-18) to provide access for tourist transportation. Construction-related traffic impacts have the potential to adversely impact tourism traffic and the existing Great River Road heritage tourism economy, which have the foreseeable potential to cause economic hardships to Laura Plantation, causing potential adverse effects later in time (i.e., cumulatively). However, these potential cumulative effects will not rise to the level of adverse for Laura Plantation.

Based on this evaluation, the undertaking will have **No Adverse Effect** on Laura Plantation.

Cazenave Motor Company – 1205 LA-18

The undertaking, specifically the overhead conveyors with support footings, will create a new introduction to the viewshed of the Cazenave Motor Company. The early twentieth century automobile dealership is significant under Criteria A and C and retains integrity of location, design, setting, materials, workmanship, feeling and association. Cazenave Motor Company conveys its significance through its integrity of design, setting, workmanship, and materials. These important characteristics of integrity will not be impacted substantially by the new introduction to the viewshed due to the distance from the historic property and undertaking. The undertaking will have an effect to the

historic property, but the visual intrusion will not adversely affect any of the characteristics that make the historic property eligible for inclusion in the NRHP.

Based on this evaluation, the undertaking will have **No Adverse Effect** on the Cazenave Motor Company.

St. Philip Catholic Church – 1175 LA-18

The undertaking, specifically the overhead conveyors with support footings, will create a new introduction to the viewshed of the St. Philip Catholic Church. The church is significant under Criteria A and C and retains integrity of location, design, setting, materials, workmanship, feeling and association. St. Philip Catholic Church conveys its significance through its integrity of design, setting, workmanship, and materials. These important characteristics of integrity will not be impacted substantially by the new introduction to the viewshed due to the distance from the historic property and undertaking. The undertaking will have an effect to the historic property, but the visual intrusion will not adversely affect any of the characteristics that make the St. Philip Catholic Church eligible for inclusion in the NRHP.

Based on this evaluation, the undertaking will have **No Adverse Effect** on the St. Philip Catholic Church.

5939 LA-18

The undertaking will create a new introduction to the viewshed of the 5939 LA-18. Vibration traffic-related impacts from the project's construction and operation also will affect the historic property. The Creole cottage is significant under Criterion C and conveys its significance through its integrity of design, workmanship, and materials. Vibratory traffic-related impacts and the introduction of new visual elements within the viewshed will not substantially impact these characteristics of integrity to the degree that lessens one's understanding or appreciation for the historic property. The undertaking will have an effect to the historic property, but the impacts will not adversely affect any of the characteristics that make the resource eligible for inclusion in the NRHP.

Based on this evaluation, the undertaking will have **No Adverse Effect** on 5939 LA-18.

Woodville Cemetery – 176 Woodville Dr

The undertaking will create a new introduction to the viewshed of the Woodville Cemetery. The ca. 1890 cemetery is eligible for listing in the NRHP under Criterion A and retains integrity of location, design, materials, feeling, and association. The Woodville Cemetery originally was included within the French arpent (long lot) system that stretched from the Mississippi River to at least present-day UPRR. Woodville Rd, a

frontage road adjacent to the cemetery, was created during the construction of the ca. 1989 Veterans Memorial Bridge. In ca. 2006, the west bank bridge approach eventually was extended southwest to connect with LA-3127. As a result of these recent developments, the integrity of setting for the Woodville Cemetery is substantially altered. Therefore, the undertaking's new introduction to the viewshed will have less of an impact on the cemetery's qualifying characteristics. The undertaking will have an effect to the historic property, but the visual intrusion will not adversely affect any of the characteristics that make the Woodville Cemetery eligible for inclusion in the NRHP.

Based on this evaluation, the undertaking will have **No Adverse Effect** on the Woodville Cemetery.

Willow Grove Cemetery – End of W 5th St

The undertaking will create a new introduction to the viewshed of the Willow Grove Cemetery, which is located within 300 feet from the proposed project. The undertaking also will result in vibratory impacts to the cemetery. The ca. 1890 cemetery is eligible for listing in the NRHP under Criterion A and retains integrity of setting, location, design, materials, feeling, and association. The visual and vibratory impacts will alter the cemetery's integrity of setting, materials, and feeling, all important characteristics of the Willow Grove Cemetery.

Based on this evaluation, the undertaking will have an **Adverse Effect** on the Willow Grove Cemetery.

Whitney Plantation NRHD – 5099 LA-18

The undertaking will create a new introduction to the viewshed of the Whitney Plantation NRHD. The NRHD is significant for its art at the national level, and architecture, agriculture, and archaeology at the state level. With the proposed boundary decrease, the historic district retains integrity of setting, location, design, materials, feeling, and association. Whitney Plantation NRHD relies on its relationship of setting to convey its significance. The introduction of new visual elements to the setting of the NRHD will diminish that characteristic. Day and nighttime lighting, noise, traffic, and vibratory impacts from the project's construction and operation also will affect the historic property due to the close proximity of the NRHD from the undertaking.

Based on this evaluation, the undertaking will have an **Adverse Effect** on the Whitney Plantation NRHD.

Evergreen Plantation NHL – 4677 LA-18

The undertaking will create a new introduction to the viewshed of the Evergreen NHL. The historic property is significant under Criterion A for its agriculture at the

national level and architecture at the state level. Evergreen Plantation retains all seven (7) aspects of integrity with setting deemed essential to understanding its significance. The introduction of new visual elements to the setting of the NHL will significantly diminish that characteristic. Additionally, day and nighttime lighting, noise, traffic, and vibratory impacts from the project's construction and operation will affect the historic property due to the close proximity of the NHL from the undertaking. The addition of these elements will affect the integrity of design, setting, feeling, and association.

Cumulative Adverse Effects

The Evergreen Plantation NHL is closed to the public and operates as a research center through earnings as a film and television production location and as a sugarcane plantation (Evergreen 2023). Based on input from Consulting Parties, specifically Evergreen Plantation's director, earnings from film and television productions occurring on the property fund the maintenance and preservation of Evergreen Plantation NHL. The proposed project's impacts, during both construction and operation, will greatly diminish the integrity of the property's setting, resulting in economic hardships on the property that will cause additional adverse effects later in time (i.e., cumulatively). Due to the NHL's unique economic situation, and in accordance with 36 CFR 800.10, CEMVN must consider foreseeable future economic conditions resulting from the permit issuance as cumulative adverse effects to the property's areas of national significance (architecture and agriculture).

Based on this evaluation, the undertaking will have an **Adverse Effect** on the Evergreen Plantation NHL. Per 36 CFR 800.10, Special Requirements for protecting National Historic Landmarks, CEMVN, to the maximum extent possible, will undertake the necessary planning and actions to minimize harm to the Evergreen Plantation NHL.

Bacas House – 4315 LA-18

The undertaking will create a new introduction to the viewshed of the Bacas House. The French Creole house is significant under Criterion C and retains integrity of location, design, setting, materials, workmanship, feeling, and association. The Bacas House conveys its significance through its integrity of design, setting, workmanship, and materials. These important characteristics of integrity will not be impacted substantially by the new introduction to the viewshed due to the distance from the historic property and undertaking. The undertaking will have an effect to the historic property, but the visual intrusion will not adversely affect any of the characteristics that make the French Creole house eligible for inclusion in the NRHP.

Based on this evaluation, the undertaking will have **No Adverse Effect** on the Bacas House.

3597 LA-18

The undertaking will not create a new introduction to the viewshed of the Creole cottage as there are no direct lines of sight to the proposed undertaking. Vibration traffic-related impacts from the project's construction and operation will affect the historic property. The French Creole house is significant under Criterion C and retains integrity of location, design, setting, materials, workmanship, feeling and association. The building conveys its significance through its integrity of design, setting, workmanship, and materials. The undertaking will have an effect to the historic property, but the vibratory traffic-related impacts will not adversely affect any of the characteristics that make the French Creole house eligible for inclusion in the NRHP.

Based on this evaluation, the undertaking will have **No Adverse Effect** on 3597 LA-18.

Dugas House – 3581 LA-18

The undertaking will not create a new introduction to the viewshed of the French Colonial cottage as there are no direct lines of sight to the proposed undertaking. Vibration traffic-related impacts from the project's construction and operation will affect the historic property. The ca. 1810 house is significant under Criterion C and retains integrity of location, design, setting, materials, workmanship, feeling and association. The building conveys its significance through its integrity of design, setting, workmanship, and materials. The undertaking will have an effect to the historic property, but the vibratory traffic-related impacts will not adversely affect any of the characteristics that make the Dugas House eligible for inclusion in the NRHP.

Based on this evaluation, the undertaking will have **No Adverse Effect** on Dugas House.

E.J. Caire & Co. Stores – 2403-2407 LA-18

The undertaking will not create a new introduction to the viewshed of the E.J. Caire & Co. Stores as there are no direct lines of sight to the proposed undertaking. Vibration traffic-related impacts from the project's construction and operation will affect the historic property. The ca. 1897 store is significant under Criterion A and retains integrity of location, design, materials, workmanship, and association. The building conveys its significance through its integrity of design, workmanship, and materials. The undertaking will have an effect to the historic property, but the vibratory traffic-related impacts will not adversely affect any of the characteristics that make the ca. 1897 store eligible for inclusion in the NRHP.

Based on this evaluation, the undertaking will have **No Adverse Effect** on the E.J. Caire & Co. Stores.

St. John the Baptist Catholic Church, Rectory, and Cemetery – 2349 LA-18

The undertaking will not create a new introduction to the viewshed of the St. John the Baptist Catholic Church property as there are no direct lines of sight to the proposed undertaking. Vibration traffic-related impacts from the project's construction and operation will affect the historic property. The church with associated resources is significant under Criteria A and C and retains integrity of location, design, materials, workmanship, feeling and association. St. John the Baptist Catholic Church conveys its significance through its integrity of design, workmanship, and materials. The undertaking will have an effect to the historic property, but the vibratory traffic-related impacts will not adversely affect any of the characteristics that make the church and associated resources eligible for inclusion in the NRHP.

Based on this evaluation, the undertaking will have **No Adverse Effect** on the St. John the Baptist Catholic Church property.

Haydel-Jones House – 2245 LA-18

The undertaking will not create a new introduction to the viewshed of the Haydel-Jones as there are no direct lines of sight to the proposed project. The raised French Creole plantation house is located approximately seven (7) miles from the undertaking. As a result, noise and vibration traffic-related impacts from the project's construction and operation also will not affect the historic property.

Based on this evaluation, the undertaking will have **No Effect** on the Haydel-Jones House.

Sorapuru House – 971 LA-18

The undertaking will not create a new introduction to the viewshed of the Sorapuru House as there are no direct lines of sight to the proposed project. The Creole cottage is located approximately 10 miles from the undertaking. As a result, noise and vibration traffic-related impacts from the project's construction and operation also will not affect the historic property.

Based on this evaluation, the undertaking will have **No Effect** on the Sorapuru House.

Summary of Effects

CEMVN has identified adverse effects to five (5) historic properties, namely: Great River Road Historic District, Oak Alley Plantation NHL, Willow Grove Cemetery, Whitney Plantation, and Evergreen Plantation NHL. Therefore, CEMVN has determined

a finding of **Historic Properties Adversely Affected** for this undertaking and is submitting this undertaking to you for your review and comment.

Consulting Parties and the Public

CEMVN is also forwarding this letter and the attached documentation to various consulting parties for their review as required by 36 CFR §800.6(a)(2) and (3). CEMVN, in its role as lead federal agency, has identified the LA SHPO, the National Parks Service, the Choctaw Nation of Oklahoma, the Chitimacha Tribe of Louisiana, and the Advisory Council on Historic Preservation and Greenfield Holdings, LLC and Consulting Parties, under 36 CFR §800.2(c)(1-4). Should any party know of additional Tribal governments or preservation groups not listed in this section who your agencies would recommend to participate, please do not hesitate to communicate these to the CEMVN. Consulting Parties identified, under 36 CFR §800.2(c)(5) in response to the initial Public Notice and other correspondence, include the Cultural Landscape Foundation, Evergreen Plantation, Whitney Plantation, the Louisiana Trust for Historic Preservation, the Louisiana Landmarks Society, the National Trust for Historic Preservation, Whitney Plantation, the Descendants Project, the Healthy Gulf organization, Florida A&M University, Florida State University, University of Texas at Austin, the Tulane Environmental Law Clinic, the Louisiana Bucket Brigade, Haydel-Jones Plantation, University of North Carolina at Wilmington, McIntosh Films, the Ranch Production, Tulane's Department of Historic Preservation, and various local residents of Wallace, Lucy, and Edgar, Louisiana.

CEMVN will also post a notice on the following Regulatory/Section 408 websites: (<https://www.mvn.usace.army.mil/Missions/Section-408/Public-Notices/> and <https://www.mvn.usace.army.mil/Missions//Public-Notices/>) describing this undertaking, its effects on historic properties, and when available, CEMVN's proposed treatment measures to avoid, minimize, and/or mitigate effects.

CEMVN plans to continue consultation with these parties throughout the development of an MOA to resolve adverse effects, pursuant to 36 CFR 800.6.

Resolution of Adverse Effects

In consultation with the Louisiana SHPO, the National Parks Service, the Advisory Council on Historic Preservation, the Applicant, and other identified Consulting Parties, the CEMVN proposes to develop a Memorandum of Agreement (MOA) for this undertaking to mitigate for adverse effects to the Great River Road Historic District, Oak Alley Plantation NHL, Willow Grove Cemetery, Whitney Plantation, and Evergreen Plantation NHL pursuant to 36 CFR 800.6.

Conclusion

CEMVN requests your comments within 30 days from receipt pursuant to 36 CFR 800.5. To summarize, CEMVN requests your review and comments regarding:

- Your organization's comments regarding the Phase I Archaeological and Standing Structures reports;
- CEMVN's efforts to identify and evaluate historic properties within the APE;
- CEMVN's determination that the undertaking will result in an Adverse Effect to Historic Properties;
- Your organization's interest in continuing to participate in this consultation to develop an MOA.

A date and time for the next Section 106 consultation meeting has not been set. The purpose of the meeting will be to discuss the historic properties, and begin discussing the appropriate steps to avoid, minimize, and mitigate the adverse effects. CEMVN will notify Consulting Parties regarding the meeting as soon as possible and forward information regarding the meeting dates and times, but the meeting is not anticipated to occur sooner than two weeks from the date of this letter. As usual, a conference call-in number, webex meeting link, and Meeting Agenda will be in the meeting package.

CEMVN will continue to send future notices, draft agreements, and other background information by e-mail to minimize communication delays and expedite the development of the MOA. Please let CEMVN know if this is impractical, so we can make alternative arrangements.

CEMVN looks forward to your concurrence with this determination. Should you have any questions or need additional information regarding this undertaking, please contact Jill Enersen, Architectural Historian at Jill.A.Enersen@usace.army.mil or (504) 862-1741, or, Brian Ostahowski, Archaeologist and Tribal Liaison at Brian.E.Ostahowski@usace.army.mil or (504) 862-2188, or, Jason A. Emery, Chief, Cultural and Social Analysis Section at (504) 862-2364 or jason.a.emery@usace.army.mil.

Sincerely,

for MARTIN S. MAYER
Chief, Regulatory Division

CC: An electronic copy of this letter with enclosures will be provided to the Section 106 Inbox, section106@crt.la.gov.

A copy of the letter addressed to the LA SHPO has been provided to all consulting parties identified to date.

Distribution List:

1. LA SHPO
1. National Park Service, National Landmarks Program
2. Chitimacha Tribe of Louisiana
3. Choctaw Nation of Oklahoma
4. Advisory Council on Historic Preservation

Enclosures

1. Enc 1 - *Revised Addendum 1: New Additions to the Phase I Archaeological Investigation of the Greenfield Development on Robert Brothers Farm Site St. John the Baptist Parish, Louisiana, August 2023*, report prepared by Gulf South Research Corporation (GSRC)
2. Enc 2 – Design Plans for the Proposed Project

References

Evergreen 2023 Web
2023 <https://www.evergreenplantation.org/>

Louisiana Division of Historic Preservation (LA DHP)
1992 "Whitney Plantation Historic District." National Register of Historic Places Nomination Form. National Register Staff, Louisiana Division of Historic Preservation, June.

NETR Online (NETR)

Var. Historic aerials, USGS maps. Accessed online November 2020 at <https://www.historicaerials.com/viewer>.

Times-Picayune

2015 "Cazenave's Motor Co. celebrating 100th anniversary 'Loyal customers' big part of the success – Four generations have sold Fords." *Times-Picayune, The* (New Orleans, LA), River Parishes ed., sec. RIVER PARISHES PICAYUNE, 19 July 2015, p. I01. NewsBank: America's News – Historical and Current, infoweb.newsbank.com/apps/news/document-view?p=AMNEWS&docref=news/156AD5EDF4589AB0. Accessed 30 Jan. 2023.

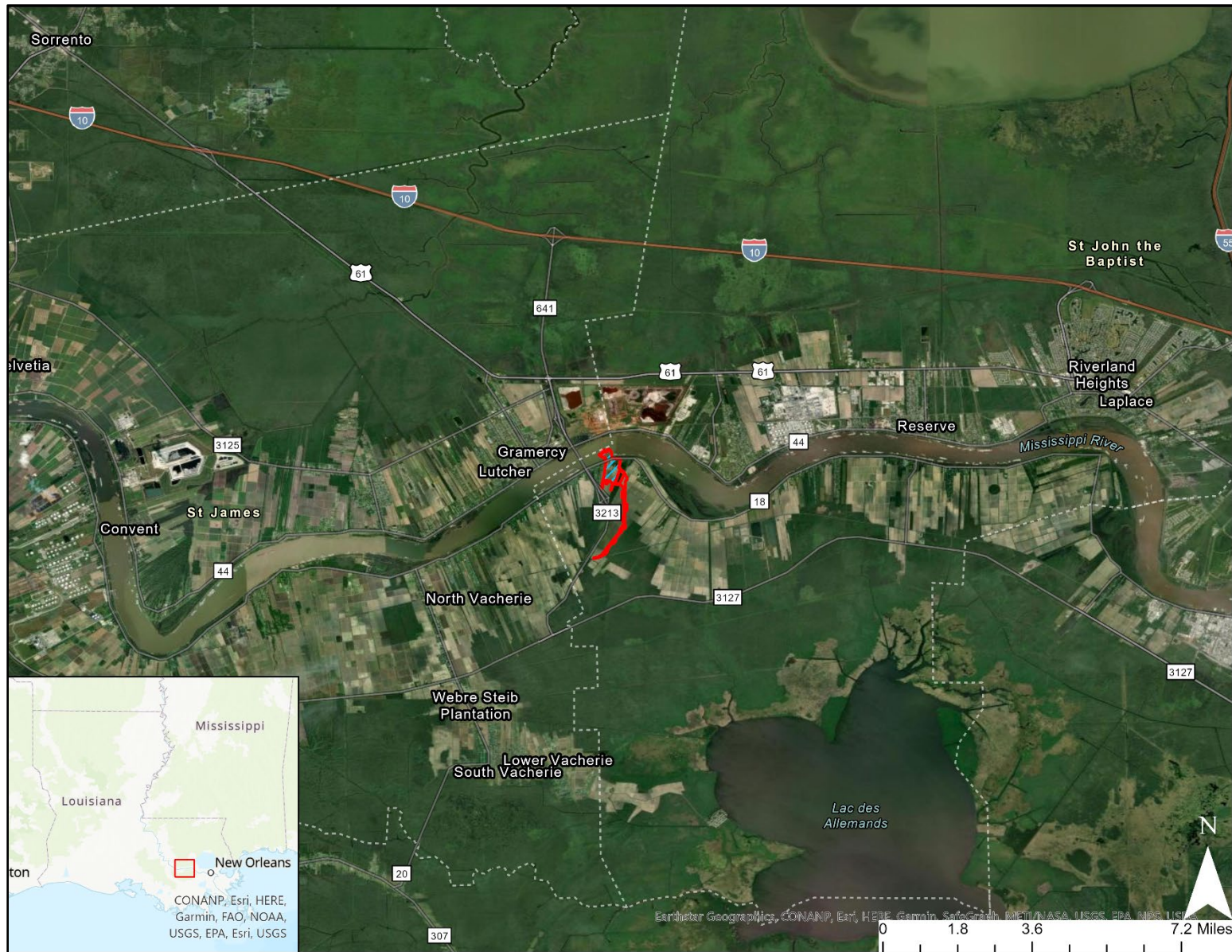


Figure 1. Project Location Displayed on Aerial Imagery.

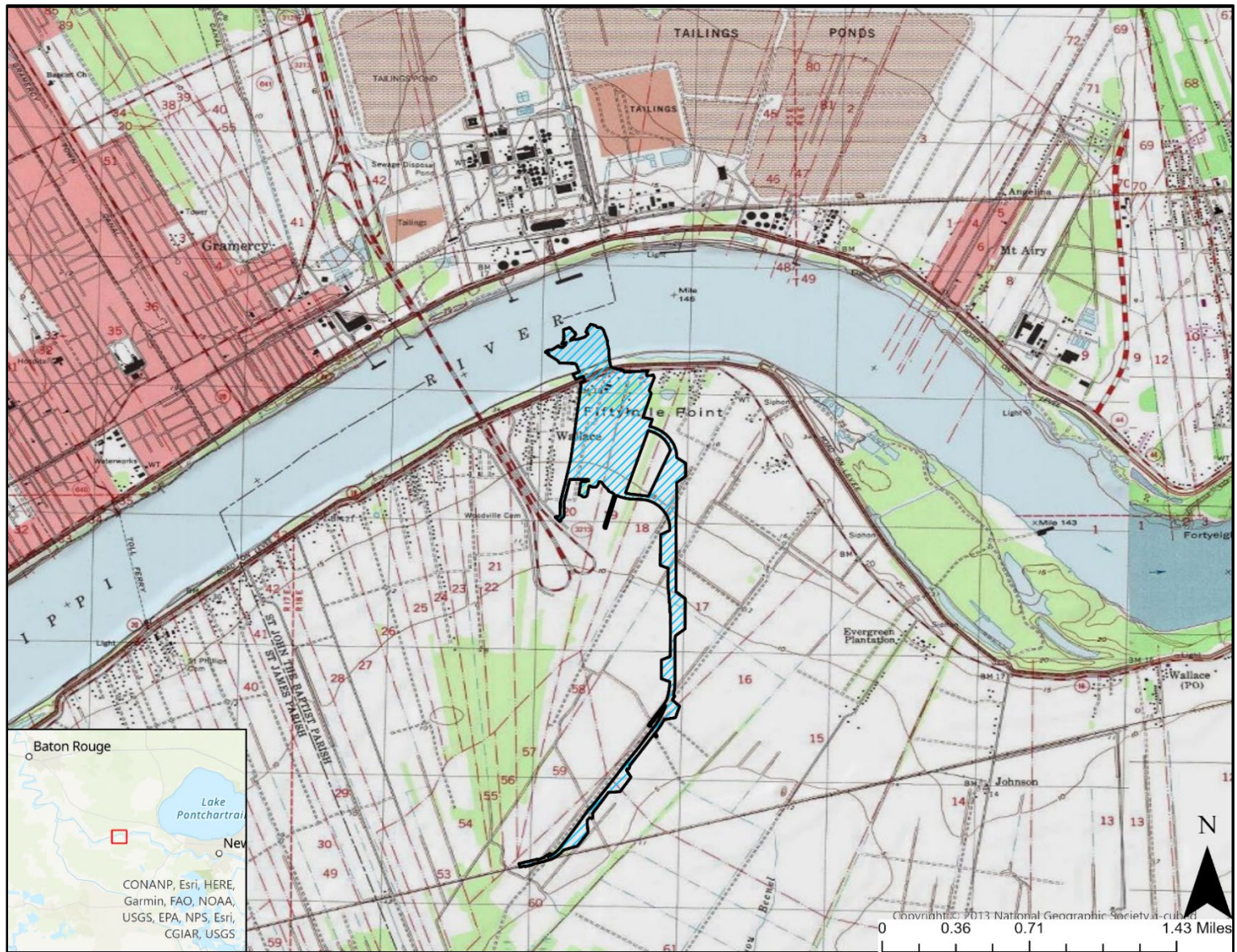


Figure 2. Project Area on 7.5' USGS Topographic Map.

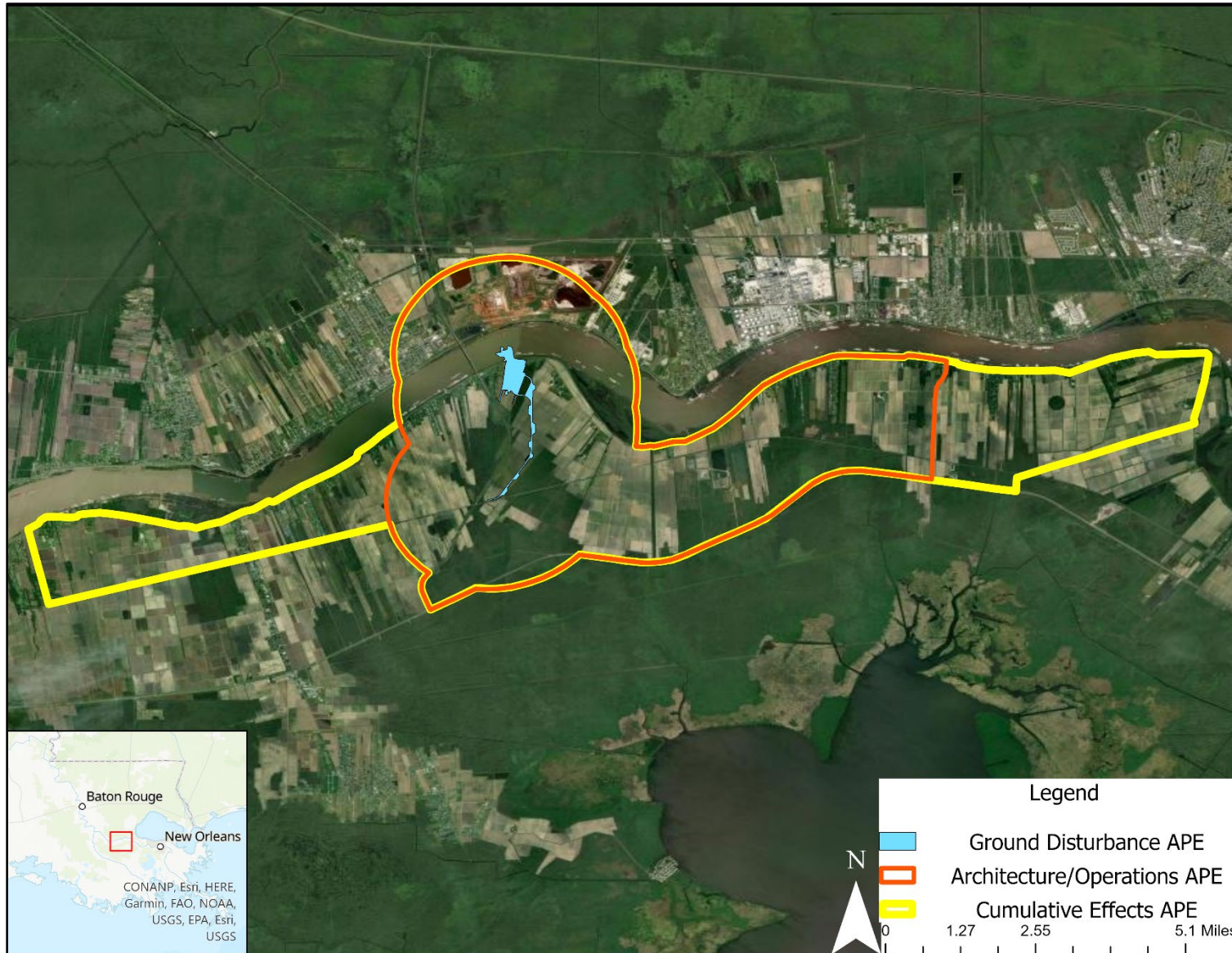


Figure 3. Areas of Potential Effect Overlaid on Aerial Imagery.

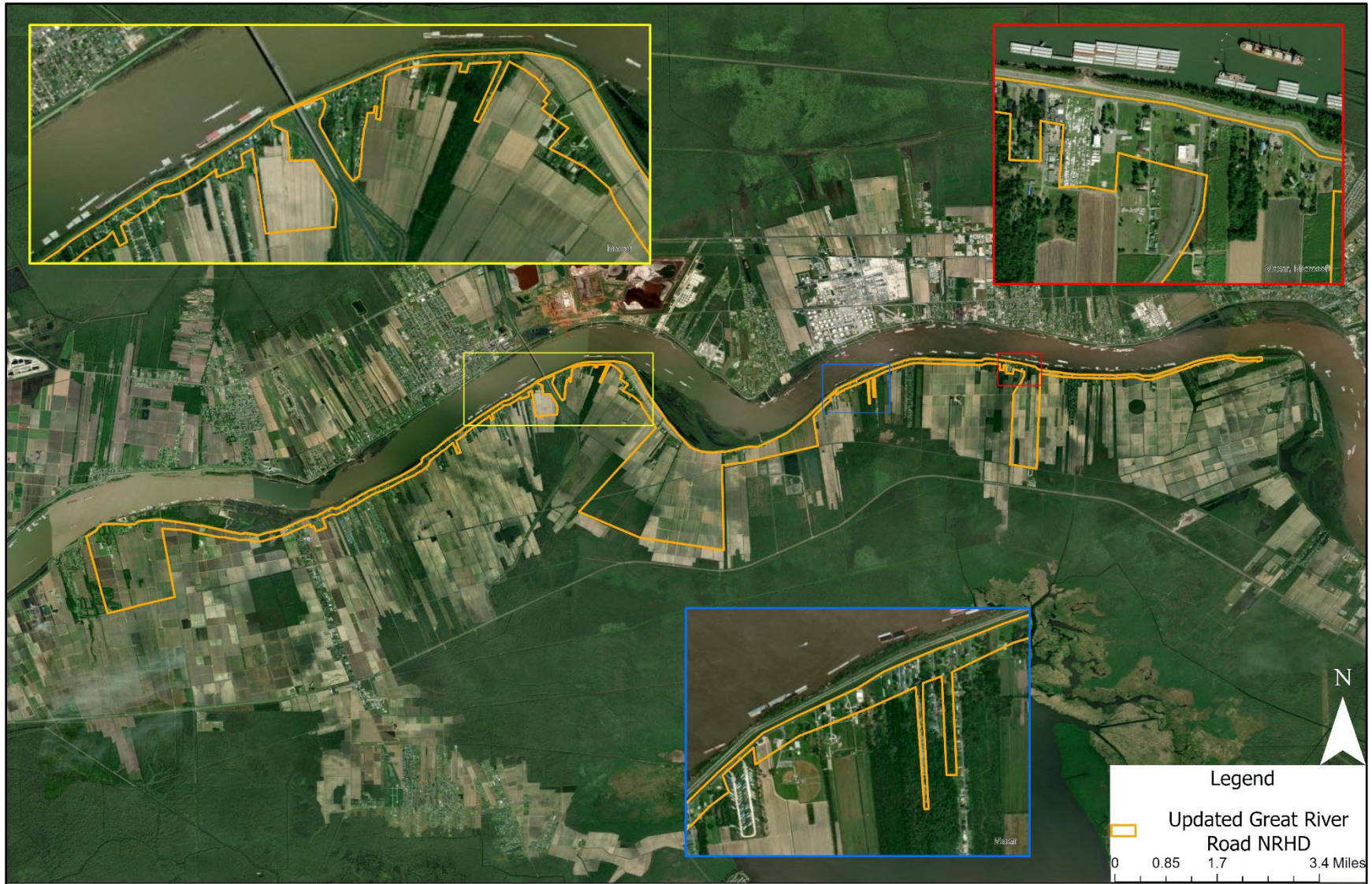


Figure 4. Boundary for Great River Road NRHD

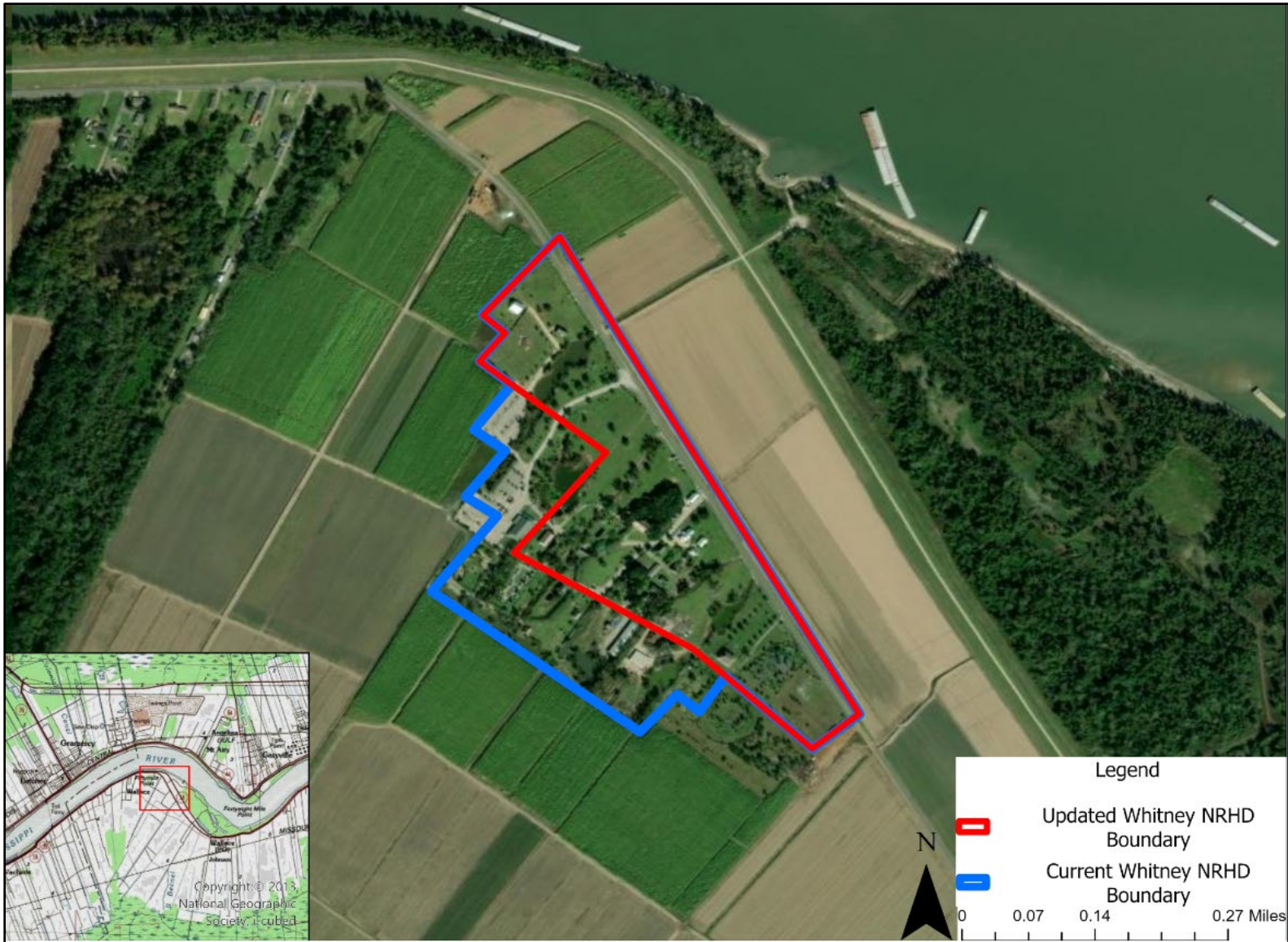


Figure 5. Boundary decrease for Whitney Plantation NRHD.