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Exhibit DD. Grace Farms East Letter of Submittal to SHPO & Desktop Cultural Review

June 4, 2013

Ms. Pam Breaux
State Historic Preservation Officer
Division of Archaeology
Office of Cultural Development
Department of Culture, Recreation & Tourism
P.O. Box 44247
Baton Rouge, LA 70804

Re: Grace Farms, Iberville Parish (East Section)

Dear Ms. Breaux:

This letter is in reference to the desktop assessment we sent you on November 20, 2012, relative to the Grace Farms property in Iberville Parish which my client, the Baton Rouge Area Chamber (BRAC) seeks to make available for industrial development under the Louisiana Economic Development program. In that assessment, we recommended that, because,

Most of the APE is back acreage from Trinity Plantation, which fronted on Bayou Grosse Tete... The distance of the APE back (west) from that bayou suggests that there are unlikely to be plantation structures in this area, which was almost certainly reserved for sugar cane fields... No area survey of this back acreage is recommended. On the other hand, two bayous transect the APE, Bayou Maringouin and Bogan's Bayou. The former has been surveyed by CEI... It is also recommended that a Phase I survey be conducted of both banks of Bogan's Bayou to determine if there are cultural resources extant on that bayou's natural levees (Shuman 2012).

Your office concurred with this recommendation. BRAC has since revised their plans so that they will not be developing or otherwise affecting any property closer than 200 feet to Bogan's Bayou (See attached map). Accordingly, we respectfully request that you issue a letter to us, for transmittal to BRAC, stating that no further Section 106 issues remain for the area indicated within the red boundary lines on the attached map.

Thank you for your assistance in this matter.

Sincerely,

Malcolm K. Shuman, Ph.D.

SURA, Inc.

Enc. Map of Grace Farms East

Cc: Mr. Jim Cavanaugh, BRAC



DESTOP REVIEW OF CULTURAL RESOURCES BACKGROUND AND RECOMMENDATIONS FOR GRACE FARMS

Nov. 20, 2012

SURA, Inc.

Introduction

This report addresses a request from the Baton Rouge Area Chamber (BRAC) to conduct a desktop review of cultural resources and cultural resource possibilities on the Grace Farm tract in Iberville Parish, Louisiana (Figure 1). To perform this work, several tasks were carried out. First, the files of the Louisiana Division of Archaeology (LDOA) were examined to determine if the area had received previous archaeological attention. Second, the LDOA's cultural resources map was consulted to determine if there were recorded sites in the project area. Third, historic topographic maps from the Louisiana State University Cartographic Information Center (LSUCIC) were researched to see if historic structures appeared on them, as well as to see if physiographic changes had taken place over the past 75-odd years. When these tasks were completed, recommendations were made regarding the necessity of cultural resources fieldwork

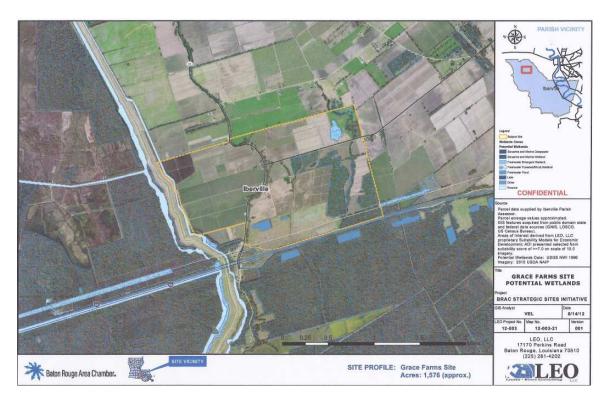


Figure 1. Area of Potential Effects (APE).

Previous archaeological projects in the Area of Potential Effects (APE)

Four previous projects have taken place in/adjacent to this APE. The earliest was Robert Neuman's 1968 survey of the proposed route of I-10, a survey for which no report exists, though Malcolm Shuman was a crew member during the portion of the survey that passed through Iberville Parish. In 1982, Gibson conducted a study for the Atchafalaya protection levees (Gibson 1982). This project took place on the western boundary of the current APE and did not record any sites for the APE. Three years later Shuman conducted a survey for a water line that ran along La Hwy 76, alongside Bayou Maringouin, and recorded one cemetery (Shuman 1985). The most pertinent survey was one by Coastal Environments, Inc. (CEI), that included the banks of Bayou Maringouin, off La Highway 76 (Kelley et al. 2000). This survey recorded a number of sites along the bayou, two of them in the current APE. These sites will be discussed in the next section.

Previously recorded archaeological sites in the APE

Two sites have been recorded for the APE. Their locations are given in Figure 2. These sites will now be described.

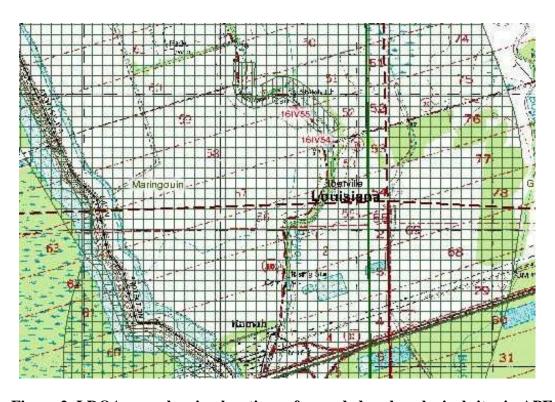


Figure 2. LDOA map showing locations of recorded archaeological sites in APE.

16IV54 (Little Four Site)

This site, located at 643740E, 3365660N (Zone 15), on the west bank of Bayou Maringouin, is a 20th-century historic location 131.2 feet (ft) x 197 ft (40 meter [m] x 60 m) in extent. It was apparently part of a small tenant location. Its National Register significance is given as "unknown." It was recorded in 1999 (LDOA 1999)

16IV55 (Pink Trailer Site)

This site, located at 643580E, 3365860N (Zone 15), on the west bank of Bayou Maringouin, is a 20th-century historic location 262.5 feet (ft) x 197 ft (80 meter [m] x 459.3 m) in extent. It was apparently part of a small tenant location. Its National Register significance is given as "unknown." It was recorded in 1999 (LDOA 1999)

Table 1. Recorded archaeological sites in APE.

Site			NRHP	Last		
No.	Name	Hist/Prehist	Status	Visit	UTM Location	Lat/Lon
	Little				643740E,	30o24'52"N,
16IV54	Four	Historic	Unknown	1999	3365660N	91o30'13"W
	Pink				643580E,	30o24'59"N,
16IV55	Trailer	Historic	Unknown	1999	3365860N	91o30'18"W

Historic Topographic Maps

Historic topographic maps from the Louisiana State University Cartographic Information Center (LSUCIC) were examined, beginning with the 1935 Grosse Tete (Figure 3) and Osca Bayou 1935 (Figure 4) 15-minute quadrangles.

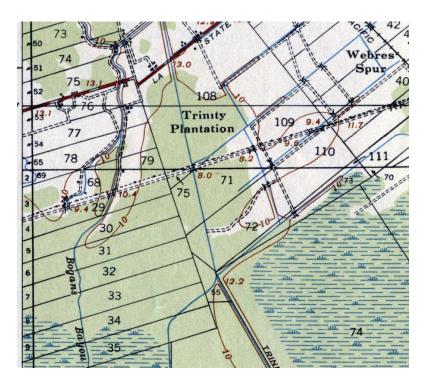


Figure 3. Portion of Grosse Tete, La. 1935 15-minute Topographic Quadrangle showing portion of APE.

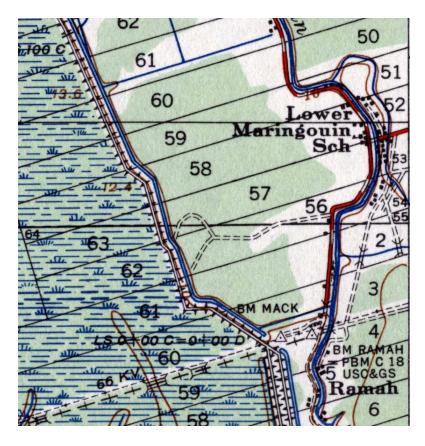


Figure 4. Portion of Osca Bayou, La. 1935 15-minute Topographic Quadrangle showing portion of APE.

Both these maps indicate heavy settlement along the banks of Bayou Maringouin and also, to some extent, along Bogan's Bayou; it is doubtless part of this settlement pattern that sites 16IV54 and 16IV55 represent.

The 1999 Maringouin 7.5-minute quadrangle is useful in showing the two known cemeteries in the APE (Figure 5).

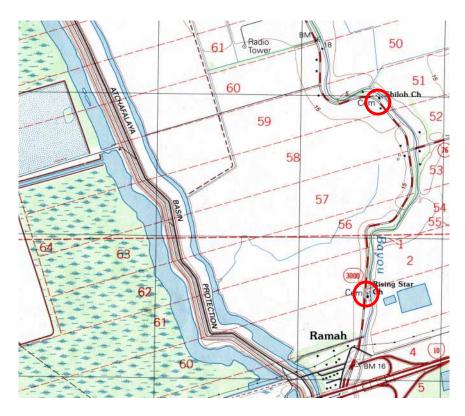


Figure 5. Portion of Maringouin 1999 7.5-minute topographic Quadrangle, showing marked cemeteries in APE.

Conclusion and Recommendations

Most of the APE is back acreage from Trinity Plantation, which fronted on Bayou Grosse Tete. The distance of the APE back (west) from that bayou suggests that there are unlikely to be plantation structures in this area, which was almost certainly reserved for sugar cane fields. Trinity's big house is atop a Plaquemine-period mound (16IV7) (Jones and Shuman 1987), but the village area was probably not so far back as the fields under consideration here. No area survey of this back acreage is recommended. On the other hand, two bayous transect the APE, Bayou Maringouin and Bogan's Bayou. The former has been surveyed by CEI and two sites were located inside the APE. Because the NRHP status of these two sites is given as "unknown," it is recommended that these locations be revisited by archaeologists to determine if the sites still exist and to determine their NRHP status (Figure 6). It is also recommended that a Phase I survey be conducted of both banks of Bogan's Bayou to determine if there are cultural resources extant on that bayou's natural levees (Figure 7).

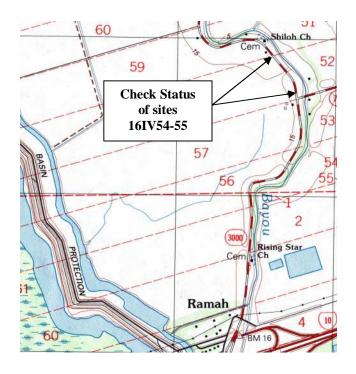


Figure 6. Locations that should be checked to determine Status of sites 16IV54 and 16IV55.

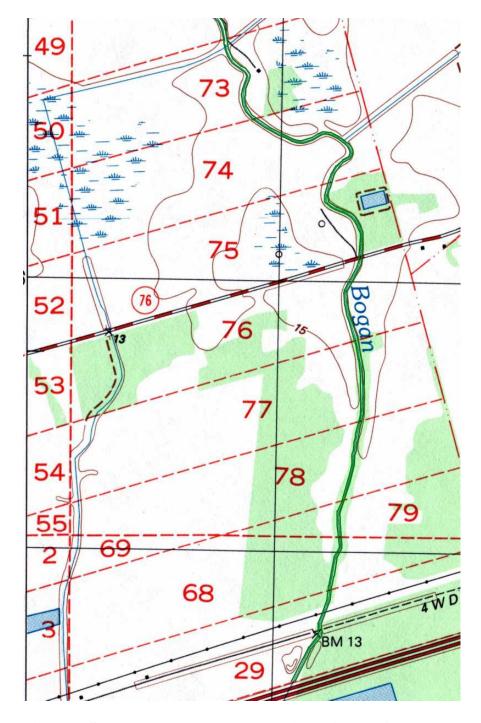


Figure 7. Suggested survey along both sides of Bogan's Bayou (green lines).

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LSUCIC (Louisiana State University Cartographic Information Center)

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