

Exhibit A

NEW ORLEANS LA 70005

PARDON OUR INTERRUPTION



PRE-CONSTRUCTION ACTIVITY AT THE
GREENFIELD GRAIN ELEVATOR SITE

WHAT SHOULD YOU EXPECT?

Construction equipment noise.

Driving test piles.

Hammering noise associated with driving of piles.

HOW LONG WILL IT LAST?

TENTATIVE

May 19th, 2022 - June 24th, 2022

QUESTIONS? CONTACT US AT GREENFIELDLA.COM/COMMUNITY OR (225) 372-4



GREENFIELD

LOUISIANA, LLC

70090



OREV

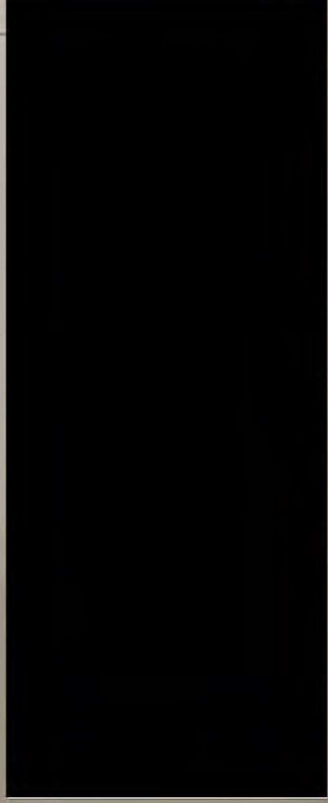


Exhibit B







Exhibit C



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New York, New York 10012
212-614-6464
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May 25, 2021

By email to: cmcgimsey@crt.la.gov

Dr. Chip McGimsey
State Archaeologist
Division of Archeology
Office of Cultural Development
Louisiana Department of Culture,
Recreation and Tourism
Capitol Annex Building
1051 North Third Street
Baton Rouge, LA 70802

By email to: seidemann@ag.louisiana.gov

Mr. Ryan Seidemann, RPA
Chief, Lands & Natural Resources Section
Office of Attorney General
1885 North Third Street
Baton Rouge, LA 70802

**Re: Request for Cease-and-Desist Order to Protect Potential Burial Grounds
and other Cultural Resources at Site of Proposed Grain Elevator**

Dear Dr. McGimsey, Mr. Seidemann:

On behalf of The Descendants Project, an organization based in Wallace, Louisiana, founded to reverse the contemporary legacies of slavery faced by the local descendant community, we write to bring your attention to a recent assessment by forensic researchers of locations where unmarked burial grounds and other cultural resources may exist on the site of a proposed grain terminal in Wallace, Louisiana. Given that the project site spans an area where three different plantations once operated, the researchers believe it is probable that one or more of the anomalies identified contain the graves of people once enslaved there.

We are alarmed at what appears to be construction on the site even though necessary permits have not yet been issued by the U.S. Army Corps of Engineers and the Office of Coastal Management. Members of the organization and the surrounding community have reported very loud, booming noises from the site associated with what appears to be heavy, ground penetrating activity. We are providing you with video evidence of the recent construction activities on May 12 and May 19, 2021. You can access these materials at this link:

<https://drive.google.com/drive/folders/1t4reJ2181zBQliiWvz85OXTXAAmgbRxr?usp=sharing>.

We also attach hereto a map assembled by the researchers which shows a series of anomalies and the locations of sugar mills and outbuildings on the site. The map shows that the project area spans what were once the Horn, Mialaret, and Whitney Plantations. Anomalies, as used herein and as we've referred to them in our previous reporting to you, are "things that appear to be out-of-place in an archaeological setting typified by sugarcane fields," such as a "small stand of trees in a plowed field [that] might be avoided because it contained headstones or was known to have been a cemetery." See, e.g., [Cartographic Regression Analysis of Certain Tracts of Land, Coastal Environments, Inc. 2020](#). Archaeologists identified anomalies on this site through careful analysis of historic maps, other historic records, and in this instance, combined with later obtained aerial imagery of the land. Such anomalies often correspond to unmarked gravesites or historic or cultural resources.

The map was assembled by Forensic Architecture, a research agency based at Goldsmiths, University of London, in consultation with an experienced archaeologist in Louisiana with expertise in the use of cartographic regression to identify probable historic sites, particularly unmarked burials in this area along the Mississippi River. Forensic Architecture is an internationally renowned research agency with expertise in investigating human rights violations, including environmental destruction, and developing and applying new evidentiary methods and complex multimedia spatial analyses. Forensic Architecture has worked with prominent international and non-governmental organizations such as the United Nations, the International Committee of the Red Cross, Amnesty International, Doctors Without Borders, and Human Rights Watch.

In light of the threat posed to potential gravesites by this construction activity and the authority vested in you pursuant to La. R.S. 8:678, to protect and preserve unmarked burial sites, **we request that you:**

- 1) immediately issue a cease-and-desist order to the developer, Greenfield Louisiana; and,**
- 2) require a full site survey and investigation utilizing the range of methods recommended by experts to locate and identify human graves, with particular attention to those locations identified by the experts working with Forensic Architecture.**

As you know given your field of expertise, it is an undisputable fact that there are unmarked burials of enslaved people all along this stretch of river where plantations once operated. It is just one of the egregious features of the system of chattel slavery that their deaths and burials were not honored or recorded by the white society that enslaved them. As a result, their resting places have in too many instances been lost to history, and to their families. In some cases, we know these cemeteries have been completely destroyed by ground disturbing construction activities, as was the case the Acadia Plantation Cemetery, or desecrated by pipeline construction as with the Buena Vista Plantation Cemetery, both in St. James Parish.

As an organization founded by and for descendants of people enslaved on these plantations who had no choice in where and how they were buried and commemorated, the Descendants Project believes that this entire area is sacred and should be protected and preserved against destruction and disturbance, particularly through this kind of development which poses a threat to both ancestor and descendant. The Louisiana Constitution protects the right of the people to preserve, foster, and promote their

respective cultural origins. La. Const. Art. XII, Sec. 4. For the Descendants Project, such unmarked burial grounds, and indeed this entire region, are central to the acknowledgement and preservation of their cultural origins.

It is worth pointing out that cemetery dedication law in Louisiana is rooted in the recognition that “cemeteries are considered by most cultures to be sacred,” that we have “moral duties to the wishes of the dead” and that there is a “generally held sanctity for cemeteries.”¹ For too much of our history, these notions did not and could not extend to the places where enslaved people were buried, and their descendants were deprived of these rites and rituals. This historical and moral breach is what makes the identification, location, protection, and preservation of unmarked burials, more urgent for descendants, and gives cemetery dedication law more meaning.

Finally, because this project must be permitted by a federal agency, it requires a consultation pursuant to Sec. 106 of the National Historic Preservation Act to ensure the project will not impact historic sites. Your office may already be involved in overseeing any site surveys pursuant to section 106. On that point, we would emphasize the criteria for inclusion on the National Register of Historic Places includes sites “associated with events that have made a significant contribution to the broad patterns of our history;” or that are “associated with the lives of persons significant in our past;” or “that have yielded or may be likely to yield, information important in prehistory or history.”² At risk of understatement, burial sites of people enslaved on plantations are associated with “events that have made a significant contribution to the broad patterns of our history” in this country, the “lives of persons significant in our past,” and would yield information important in our history.

I am available should you have any questions or concerns or wish to discuss this matter further. We thank you for your urgent attention to this matter.

Sincerely,



Pamela C. Spees

Omar Farah

Senior Staff Attorneys

Center for Constitutional Rights

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¹ Attorney General Opinion No. 07-0183, available at <http://www.lcb.state.la.us/ago/ago07-0183.pdf>.

² <https://nationalregisterofhistoricplaces.com/faq.html>

Exhibit D



Jeff Landry
Attorney General

State of Louisiana

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June 1, 2021

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Center for Constitutional Rights
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New York, NY 10012

VIA ELECTRONIC MAIL ONLY

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ofarah@ccrjustice.org

Re: Request for Cease-and-Desist Order to Protect Potential Burial Grounds and other Cultural Resources at Site of Proposed Grain Elevator

Dear Ms. Spees and Mr. Farah:

We are in receipt of your letter dated May 25, 2021, regarding the above-noted matter. We have reviewed the materials that you have sent as well as the relevant law. Based upon that review, we are aware of no legal basis for the issuance of a cease-and-desist order at this time. While we share your concerns for the protection and preservation of the cultural heritage and cultural resources of areas such as those along the Mississippi River in St. James Parish, we are also limited by what the law allows us to do. Neither the cemetery dedication laws nor the Louisiana Unmarked Human Burial Sites Preservation Act (“Unmarked Burials Act”) provide either of our offices with the authority to issue cease-and-desist orders in the absence of definitive proof of the disturbance of a specific burial ground. While some of the anomalies identified in your letter may represent unmarked burial sites, so long as they are undisturbed, the above-noted laws do not apply. Until such an event occurs, we cannot take action under the existing laws. As you are aware, the Unmarked Burials Act provides for mandatory reporting of any inadvertent discovery in La. R.S. 8:680. Only upon definitive discovery or disturbance might our jurisdictions be triggered. Should you now or in the future possess definitive evidence of such discovery or disturbance, we stand ready to evaluate that information.

With best regards, we are,

Very truly yours,

JEFF LANDRY
ATTORNEY GENERAL

By: _____


Ryan M. Seidemann, Ph.D.
Assistant Attorney General

cc: Charles R. “Chip” McGimsey, Ph.D.

Exhibit E

**PHASE I ARCHAEOLOGICAL INVESTIGATION
OF THE GREENFIELD DEVELOPMENT
ON ROBERT BROTHERS' FARM IN
ST. JOHN THE BAPTIST PARISH, LOUISIANA**

**Prepared for:
Greenfield Exports, LLC**

**Prepared by:
Renee Erickson, M.A., RPA
Gulf South Research Corporation**



December 2020

**PHASE I ARCHAEOLOGICAL INVESTIGATION
OF THE GREENFIELD DEVELOPMENT
ON ROBERT BROTHERS' FARM IN
ST. JOHN THE BAPTIST PARISH, LOUISIANA**

Prepared for:
Greenfield Exports, LLC

Prepared by:
Renee Erickson, M.A., RPA

Gulf South Research Corporation
8081 Innovation Park Dr.
Baton Rouge, LA 70820



PURCHASE ORDER NO. 20200721-001
GSRC PROJECT NO. 80976002

A handwritten signature in black ink, appearing to read "Bretton M. Somers", is written over a horizontal line.

Bretton M. Somers, PhD, RPA
Principal Investigator

December 2020

ABSTRACT

Gulf South Research Corporation (GSRC) personnel conducted an intensive Phase I archaeological survey of the proposed development area for a grain transfer facility on the Robert Brothers' Farm in Wallace, St. John the Baptist Parish, Louisiana. GSRC conducted the investigation on behalf of Ramboll US Consulting, Inc. (Ramboll) for Greenfield Exports, LLC under Section 106 of the National Historic Preservation Act (NHPA) 54 U.S.C. § 306108 and its implementing regulations. The project is subject to Federal Department of the Army Permitting under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act as well as State of Louisiana Coastal Use Permitting. Therefore, a USACE/LDNR Joint Permit Application was filed on November 6, 2020 seeking authorization under these authorities. LDNR assigned the action Coastal Use Permit Number P20201021 and deemed the application administratively complete on December 16, 2020. USACE routing and analyst/permit number assignment is currently pending.

There were two objectives of this investigation with the first objective determining the presence and/or absence of archaeological resources in the proposed project area through an intensive Phase I archaeological survey combining pedestrian surface inspection with shovel test pits (STPs) along transects using both high and low probability predictive models. The second objective consisted of an architectural survey to determine the potential for adverse effects to historic standing structures within the project viewshed as a result of above ground components of the proposed grain transfer facility.

The project area encompasses 264 acres of planted fields, wooded areas, and the Mississippi River levee. Approximately 115 acres were previously surveyed utilizing current Louisiana Division of Archaeology and Historic Preservation fieldwork standards or approved for projects since 2007 and therefore not included in the survey. An additional 56 acres were covered with standing sugar cane crops which prevented investigation, further reducing the number of acres surveyed. Although these 56 acres were not surveyed in their entirety, shovel tests were excavated judiciously on the edges of planted areas and spaces in between where possible. In total 91 acres were surveyed. A total of 457 shovel test pits (STPs) were excavated. Two sites (16SJB73 and 16SJB74), 286 isolated finds, two modern trash dumps, and one modern bottle dump were newly recorded during the survey.

No features were recorded for site 16SJB73 and the site does not possess any integrity, therefore further archaeological investigations are not recommended. The features for site 16SJB74 are of questionable integrity and possibly represent the remains of a structure common to the area for sugar cane farming and agricultural practices in the nineteenth century. Future research is needed to determine the function and purpose of the intact features, and therefore, this investigation recommends 16SJB74 be considered undetermined for the NRHP. Construction of the proposed project is not anticipated to have any adverse effects on this site, as project work is located well away from the site. If archaeological material not related to the located sites (16SJB73 or 16SJB74) is inadvertently discovered during the project construction, all work in that location should cease until a qualified archaeologist can examine and evaluate the nature of the uncovered remains.

The architectural survey consisted of an aboveground/architectural review of 125 known resources within the area of potential effect (APE) to assess if there was the potential for effects on aboveground/architectural historic resources. GSRC personnel accessed the LHSSS to determine what previously recorded historic resources were located within the APE, as well as the NRHP online map. No new above ground resources were identified during this investigation and no potential adverse visual elements were noted.

With submission of the final report, all records, photographs, and field notes will be curated with the State of Louisiana, Department of Culture, Recreation, and Tourism, Office of Cultural Development, Division of Archaeology. This material will be housed in the facility located at 1835 North Third Street, in Baton Rouge, Louisiana, 70802.

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ACKNOWLEDGMENTS

GSRC would like to thank Ramboll US Consulting, Inc. for the opportunity to conduct the current investigation. Additionally, GSRC thanks Dr. Bretton Somers Ph.D., RPA, who served as principal investigator and project manager, and Renee Erickson M.A., RPA who served as the director for the project. The field archaeologists included Phillip Ashlock Ph.D., Eve Carter, Victoria Ingalls Ph.D., and Mark Kudron. Ashlee Taylor, M.A., RPA performed the laboratory analysis, Erin Edwards conducted the visual impact survey, GIS analysts Christy Guempel and Marcela Guillot prepared graphics, and Ticia Bullion was responsible for report production.

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1.0 INTRODUCTION

Gulf South Research Corporation (GSRC) conducted an intensive Phase I survey of a proposed grain transfer facility on the Robert Brothers' Farm, in Wallace, St. John the Baptist Parish, Louisiana (Figures 1.1, 1.2, and 1.3). This investigation was conducted on behalf of the Ramboll US Consulting, Inc. for Greenfield Exports LLC, in compliance with Section 106 of the National Historic Preservation Act (NHPA), the Secretary of Interior's Guidelines for Local Surveys: A Basis for Preservation Planning (*National Register Bulletin* Number 24), and in accordance with directives, standards and guidelines of the Louisiana Division of Archaeology (LDOA). The project is subject to Federal Department of the Army Permitting under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act as well as State of Louisiana Coastal Use Permitting. Therefore, a USACE/LDNR Joint Permit Application was filed on November 6, 2020 seeking authorization under these authorities. LDNR assigned the action Coastal Use Permit Number P20201021 and deemed the application administratively complete on December 16, 2020. USACE routing and analyst/permit number assignment is currently pending.

This investigation was conducted by professional archaeologists meeting the qualifications specified in the Secretary of the Interior's Professional Qualification Standards (*Federal Register*, Vol. 48, No. 190, Thursday, September 29, 1983, pp. 44738-44739). Dr. Bretton Somers served as the principal investigator for this investigation and is a Registered Professional Archaeologist. This research was conducted in accordance with the professional and ethical standards of the Register of Professional Archaeologists.

The Area of Potential Effect (APE) for direct impacts from the proposed project contains two components including an 80-acre development area and a 184-acre rail spur, totaling 264 acres (Figures 1.4). The APE also includes any indirect impacts that may occur to the viewshed for any historic standing structures within the line of sight of the project. The 80-acre APE for the development area includes the necessary area for construction of the grain export terminal, supporting utilities and infrastructure, as well as temporary construction impact areas for the lay down of material, parking of construction equipment, and maneuvering of construction equipment. The 184-acre APE for the rail spur includes a 400 ft corridor connecting the development area with the existing Union Pacific Railroad to the south (Figures 1.5). Approximately 115 acres of the project area have been previously surveyed utilizing current Louisiana Division of Archaeology and Historic Preservation fieldwork standards, or were approved for projects since 2007, and 56 acres were covered with standing sugar cane which prevented direct investigation, reducing the number of acres within the APE to be surveyed to 91 acres.

The Phase I survey was performed from September 17, 2020 through September 29, 2020, and was conducted by GSRC archaeologists Eve Carter, and Mark Kudron, with assistance from Phillip Ashlock Ph.D. and Victoria Ingalls Ph.D. Renee Erickson, MA, RPA served as director for the project.



- Legend**
- Proposed Project
 - Survey Area
 - Previously Surveyed

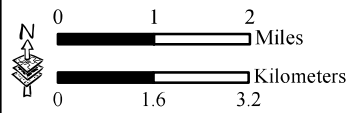
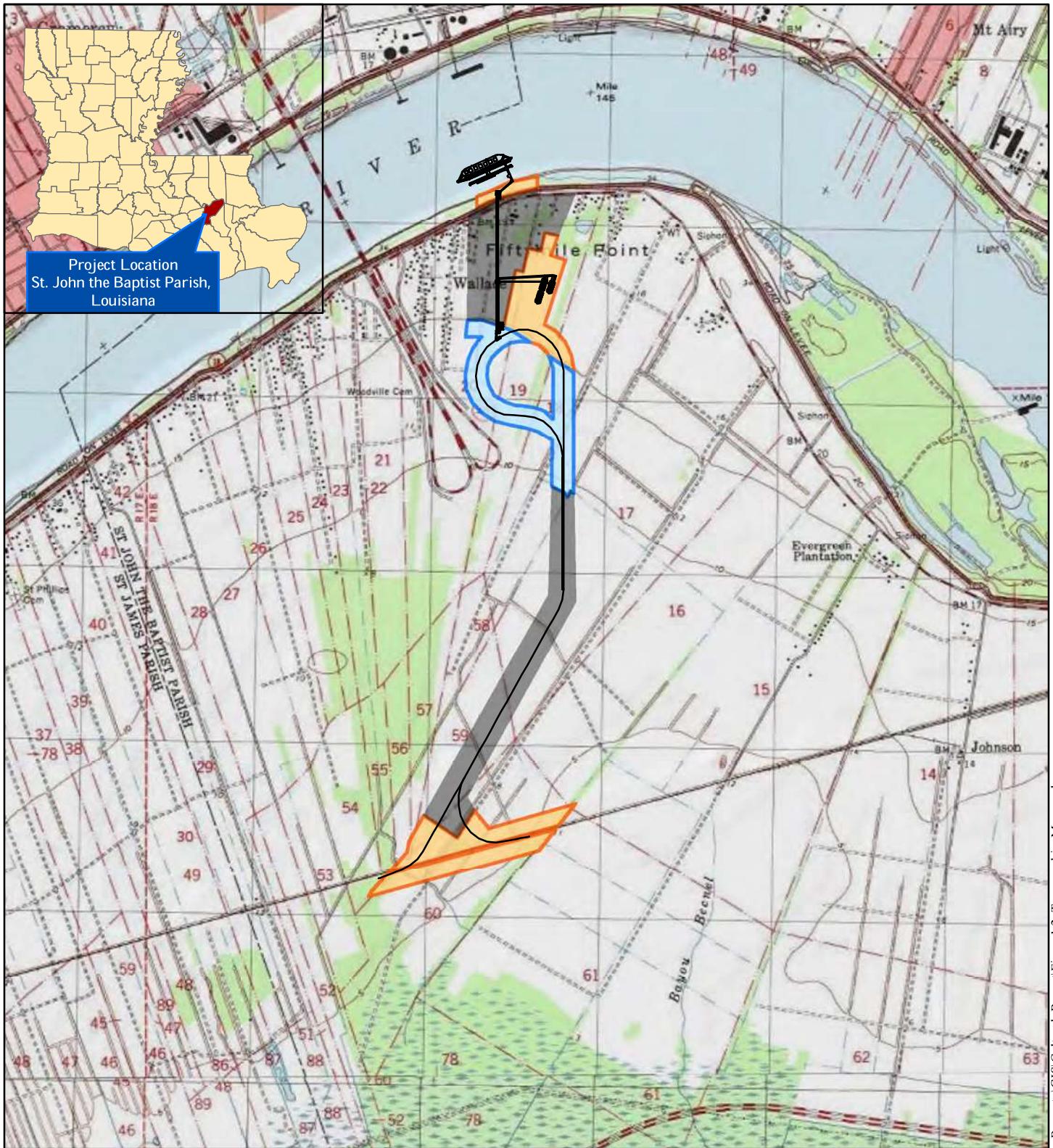


Figure 1.1. Vicinity map showing project area.



- Legend**
- Proposed Project
 - Survey Areas**
 - Low Probability
 - High Probability
 - Previously Surveyed

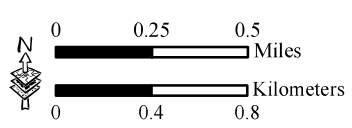
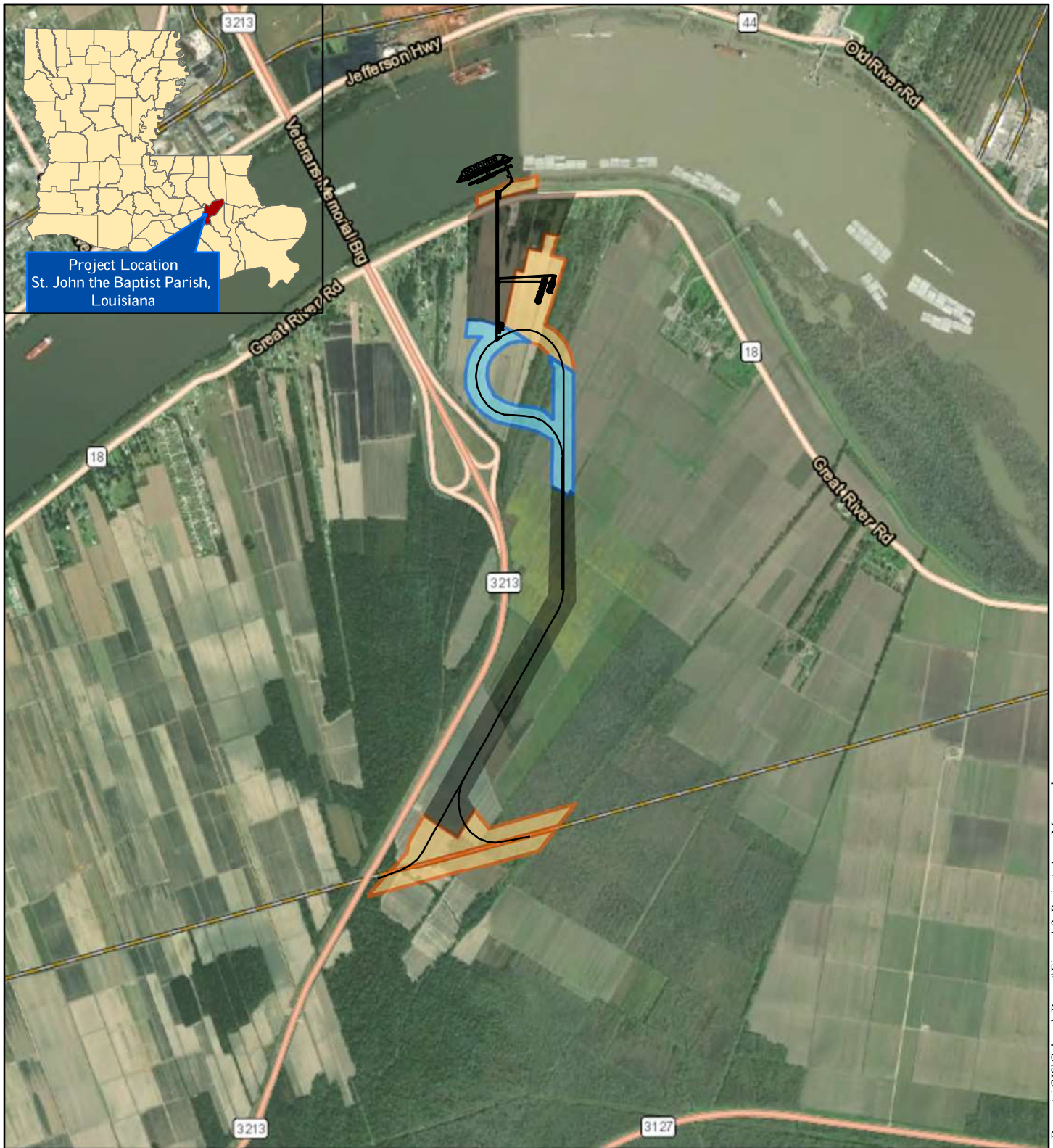


Figure 1.2. Map of project area adapted from the 2015 Lucher, Louisiana USGS 7.5' series topographic quadrangle.

K:\Projects\80976002_Ramboll_Robert_Bros_Property\GIS\Cultural_Report\Figure 1.2_Topographic_Map.mxd



- Legend**
- Proposed Project
 - Survey Areas**
 - Low Probability
 - High Probability
 - Previously Surveyed

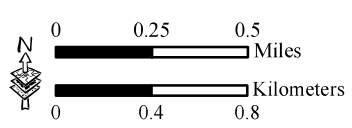


Figure 1.3. Map of project area adapted from 2019 aerial.

K:\Projects\80976002_Ramboll_Robert_Bros_Property\GIS\Cultural_Report\Figure 1.3_Project_Area_Map.mxd



Figure 1.4. Aerial view of the project area, facing southeast.



Figure 1.5. Union Pacific Railroad, view to the northeast from unimproved road.

This report follows the *Division of Archaeology and Historic Preservation September 2018 Report Standards for Cultural Resource Investigations* as recommended by the Louisiana Office of Cultural Development. Chapter 1 provides an introduction to the proposed undertaking and includes a description and background for the project. Chapter 2 includes a description of the environmental setting of the project area and a land use history. Chapter 3 includes a summary of previous research including previously conducted investigations and sites recorded within 1.0 miles of the project area. Chapter 4 describes the methods of the investigation. Chapter 5 details the results of the field investigations. Chapter 6 provides a summary and recommendations for the project.

2.0 LAND USE HISTORY

The proposed Greenfield Louisiana Terminal project is located in St. John the Baptist Parish, Louisiana, approximately 52 miles northwest of New Orleans and 46 miles southeast of Baton Rouge on the west bank of the Mississippi River and north of Lac des Allemands. The project area is ecologically complex, situated on natural levees and back swamps of the Mississippi River. The project area is located in the Mississippi Alluvial Plain, an ecoregion that stretches from southern Louisiana to southern Illinois. The local area is predominately low and flat, with very little change in elevation.

GEOMORPHOLOGY

The project area is located in the south-central region of the Mississippi River Delta Plain. The location is within an area that consists of alluvium which accumulated approximately 12,000 years ago. During the Holocene, rising sea levels forced the consolidation of multiple channels into a single winding stream which became the Mississippi River (Gagliano 1984). The alluvium consisted of the accumulation of sandy to clayey fluvial deposits (Louisiana Geological Survey 2003).

The fluvial geomorphological processes of the Mississippi River have a major influence on the natural setting of the project area. Placement of prehistoric and historic occupations occurred as a result of the formation of the river channel and its tributaries and distributaries. The accumulation of sediment which formed natural levees and collapse of the levees resulting in the formation of crevasses also contributed to land use decisions (Gagliano 1984). The geomorphological features within the project area include the Mississippi River Meander Belt 1 (Hm1) which contains point bar deposits of the Mississippi River buried by a thin layer of overbank sediments, the Natural Levee Meander Belt 1 (Hml1) made up of deposits of the natural levees, and the Crevasse Complex of Meander Belt 1 (Hmc1) formed from a crevasse channel and splay deposits (LGS 2003) (Figure 2.1).

SOILS

The US Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS), Web Soil Survey (2020) indicates that there are four soil series in the project area (Figure 2.2). The Gramercy series comprises most of the northern portion of the project area. The majority of the southern region of the project area is Schriever series soils. Cancienne soils are also found in the area (Table 2.1).

The Cancienne series consists of very deep, level to gently undulating, somewhat poorly drained mineral soils that are moderately to slowly permeable. These soils formed in loamy and clayey alluvium. They are found on high and intermediate positions on natural levees and deltaic fans of the Mississippi River and its distributaries. Slopes range from 0 to 3 percent. The typical pedon for the Cancienne series soils consist of an A or AP horizon from 0 to 58 centimeters below ground surface (cmbgs) consisting of a dark grayish brown (2.5YR 4/2) silt loam with a weak fine granular structure. Below the first horizon is a Bg or BC horizon from 58 to 200 cmbgs

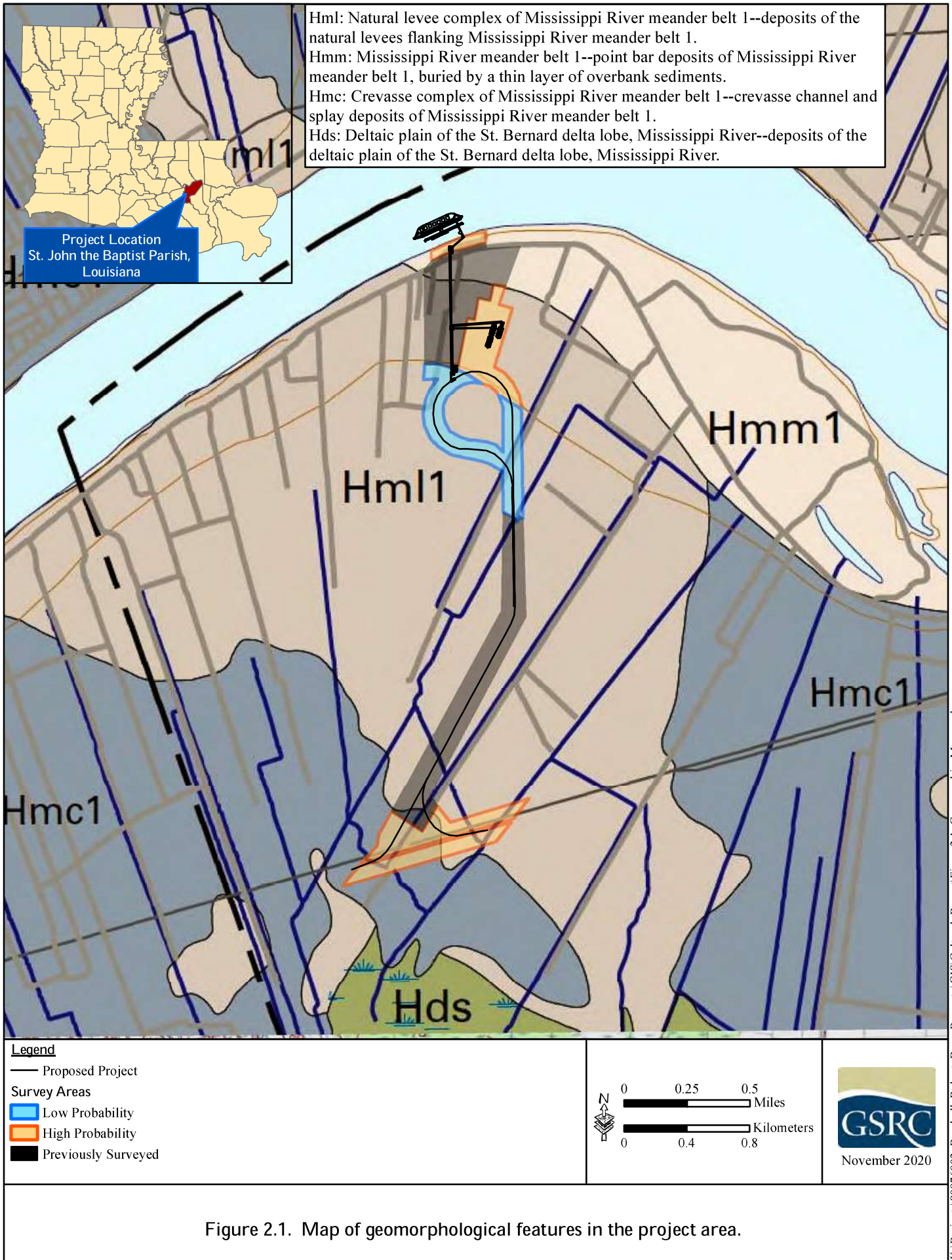
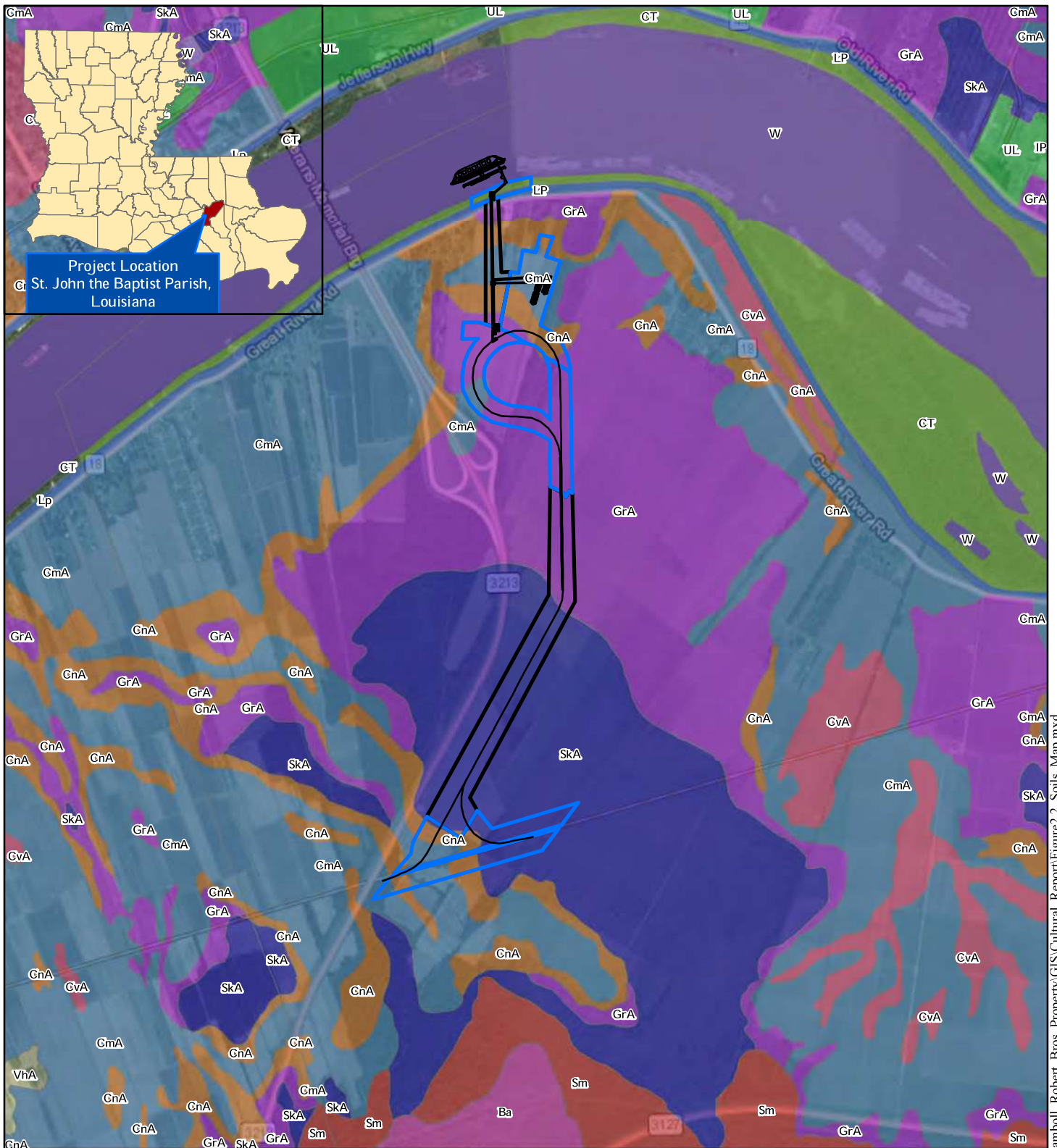


Figure 2.1. Map of geomorphological features in the project area.



Legend — Proposed Project Survey Areas Previously Surveyed Soil Data Ba, Barbary soils, 0 to 1 percent slopes, frequently flooded CT, Canebrake and Carville soils, gently undulating, frequently flooded CmA, Cancienne silt loam, 0 to 1 percent slopes SkA, Schriever clay, 0 to 1 percent slopes CnA, Cancienne silty clay loam, 0 to 1 percent slopes GrA, Gramercy silty clay, 0 to 1 percent slopes CvA, Carville silt loam, 0 to 1 percent slopes Sm, Schriever clay, 0 to 1 percent slopes, frequently flooded LP, Levees-Borrow pits complex, 0 to 25 percent slopes IP, Industrial waste pits UL, Urban and built up land W, Water		0 0.25 0.5 Miles 0 0.4 0.8 Kilometers 	 November 2020
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Figure 2.2. Map of soils in the project area.

\\GSRC-FS01\Projects\Projects\80976002_Ramboll_Robert_Bros_Property\GIS\Cultural_Report\Figure2.2_Soils_Map.mxd

consisting of grayish brown (2.5Y 5/2) silt loam with a weak medium subangular blocky structure (USDA 2013a).

Table 2.1. Soils in the Project Area.

Map Unit Symbol	Map Unit Name	Typical Profile	Parent Material
CmA	Cancienne silty loam, 0 to 1 percent slopes	<i>Ap - 0 to 58 cm: silt loam Bg - 58 to 170 cm: silty clay loam BCg - 170 to 203 cm: silty clay loam</i>	Silty alluvium
CnA	Cancienne silty clay loam, 0 to 1 percent slopes	<i>Ap - 0 to 17 cm: silty clay loam Bg - 17 to 109 cm: silty clay loam 2BCg - 109 to 200 cm: silty clay loam</i>	Silty alluvium
CT	Cancienne and Carville soils, gently undulating, frequently flooded	<i>A, Ap - 0 to 25 cm: silty clay loam Bg - 25 to 53 cm: silt loam Bw, C - 53 to 203 cm: stratified very fine sandy loam to silty clay</i>	Silty alluvium
GrA	Gramercy silty clay, 0 to 1 percent slopes	<i>Ap - 0 to 27 cm: silty clay Bssg - 27 to 106 cm: silty clay Bg - 106 to 121 cm: silty clay Ab - 121 to 203 cm: silty clay loam</i>	Clayey alluvium
SkA	Schriever clay, 0 to 1 percent slopes	<i>Ap - 0 to 20 cm: clay Bssg1 - 20 to 99 cm: clay Bssg2 - 99 to 203 cm: clay</i>	Clayey alluvium

Source: U.S. Department of Agriculture, Natural Resources Conservation Service, n.d.

The Gramercy series consists of deep poorly drained soils that formed in clay over fine-silty alluvium. These soils are located on alluvial flats and on the lower sections of natural levees on the alluvial plain of the Mississippi River and its tributaries. The slope is usually less than 0.5 percent but can be as great as 3 percent. The typical pedon for Gramercy series soil has an Ap horizon from 0 to 27 cmbgs consisting of very dark gray (10YR 3/1) silty clay with weak fine subangular blocky structure. The A horizon is followed by a Bssg horizon from 27 to 106 cmbgs consisting of gray (10YR 5/1) silty clay with a moderate medium prismatic structure parting to moderate medium angular blocky structure. Below the Bssg horizons is a Bg or Bgb horizon from 106 to 112 cmbgs consisting of gray (10YR 5/1) silty clay with a moderate medium angular blocky structure (USDA 2018a).

The Schriever series were formed in clayey alluvium and consists of very deep, poorly drained soils. These soils are found in the lower parts of natural levees and in back swamp positions on the lower Mississippi River alluvial plain. The slope ranges from less than 1 percent up to 3 percent. The typical pedon for Schriever series soils has an A horizon from 0 to 10 cmbgs consisting of a dark gray (10YR 4/1) clay that has a weak medium angular blocky structure with a fine roots present in the matrix. This layer is followed by a Bg horizon from 10 to 38 cmbgs consisting of gray (10YR 5/1) clay with weak medium angular blocky structure. The Bg horizon is followed by a Bssg horizon from 38 to 203 cmbgs consisting of gray (2.5Y 5/1) clay moderate medium prismatic parting to moderate medium subangular blocky structure (USDA 2018b).

FLORA

Prior to modern development, hardwoods including cottonwood (*Populus deltoids*), sweet gum (*Liquidambar ssp*), sycamore (*Platanus occidentalis*), and willow (*Salix nigra*) dominated the natural levee ridges that were frequently flooded. A few locations still contain the mixed hardwood forests. Areas of less frequent flooding support hickory (*Carya cordiformis* and *Carya alba*), magnolia (*Magnolia* spp.), oak (*Quercus virginiana*), pecan (*Carya pecan*), and sweet gum (*Liquidambar styraciflua*) (Kniffen and Hilliard 1988:79). Baldcypress (*Taxodium distichum*), red maple (*Acer rubrum*), and tupelo or black gum (*Nyssa aquatica*) dominate the backswamp areas. Cultivated land currently encompasses most of the project area including crops of sugar cane.

FAUNA

The availability of water and hardwood timber result in an abundance of fauna within the region. Mammals commonly found in the area include deer (*Odocoileus virginianus*), fox (*Urocyon* spp.), rabbit (*Sylvagus* spp.), raccoon (*Procyon lotor*), opossum (*Didelphus virginiana*), skunk (*Mephitis mephitis*), and squirrel (*Sciurus* spp.). Migratory and residential species of birds including egrets, herons, and migratory ducks inhabit the backswamp lakes, river channels, and tributary streams. Water turkeys (*Anhinga anhinga*) and Woodducks (*Aix sponsa*) remain along the bayous year-round. The waterways and flooded backswamps host a large numbers of alligators (*Alligator mississippiensis*), fish, snakes, and turtles (Kniffen and Hillard 1988).

CLIMATE

The climate in the project area is greatly influenced by the Gulf of Mexico resulting in warm, humid, subtropical weather. Summer temperatures average over 90 degrees, and winters tend to be mild with an average temperature of 54 degrees, and little to no snowfall. The humidity is usually high, averaging around 88 percent. Precipitation averages around 64 inches annually, with frequent thunderstorms and occasional hurricanes making landfall resulting in flooding (Muse 2009).

OVERVIEW OF LAND USE

This section will discuss the cultural history of the area. Since no prehistoric cultural material was recovered during any of the investigations, the cultural sequence presented will focus on the Historic period.

In 1539, Hernando DeSoto began exploring the southeastern United States (Clayton et al 1993). A second wave of Europeans came in the late 1600s as explorers and missionaries. Most notably was Robert Cavalier de la Salle who explored the Mississippi River. Pierre Le Moyne d'Iberville led another expedition in 1699 along the Mississippi and cleared the way for European settlement. Acadians expelled from Nova Scotia and German settlers fleeing poverty were some of the first Europeans to established permanent colonies in St. John the Baptist Parish in the early 1700s. The east and west banks of the Mississippi became known as the Acadian and German Coasts, respectively.

The movement and flooding of the Mississippi River resulted in fertile land adjacent to the waterway. Settlers were successful in their crop production and distributed produce to neighboring settlements along the river. In mid 1700s, Jesuit priests brought sugar cane to the region and planters began developing sugar production processes for commercial distribution (Rehder 1971). Several plantations in St. John the Baptist Parish became successful producers of sugar cane.

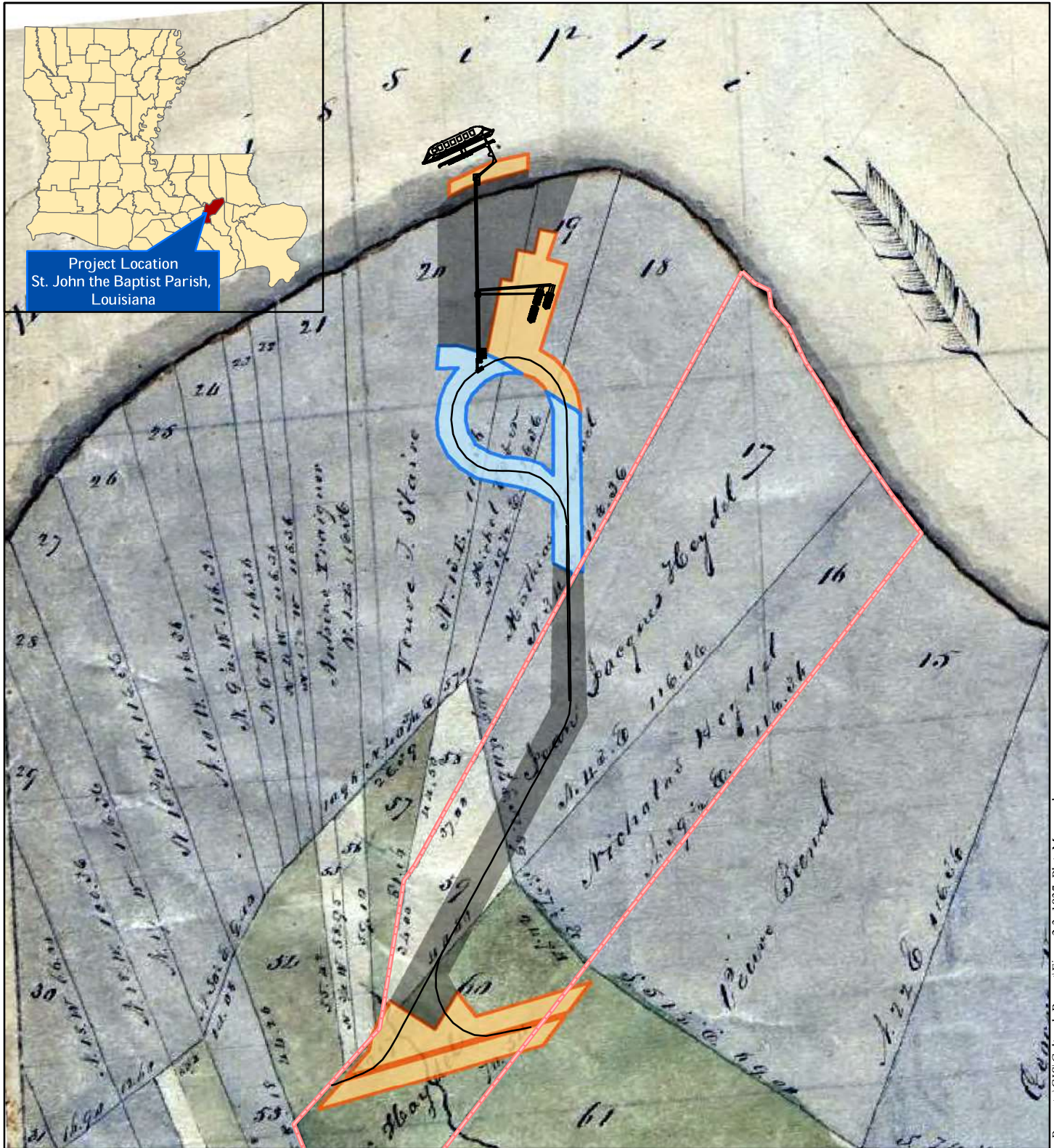
Early sugar cane production in the region was performed using horsepower to extract cane juice through wooden rollers. Advancements in steam powered engines resulted in more efficient means of sugar production with less reliance on livestock. Mills included multiple structural components including a cane crusher, boiler, chimney, and mechanical elements. Prior to the Civil War, many plantations maintained their own cane processing centers.

Economic stress from the Civil War and Reconstruction resulted in a reorganization of land and production (Goodwin 1989). Plantation property changed hands but many continued to produce sugar cane until the turn of the nineteenth century. Primary crops may then have switched to rice (Bouchereau 1868). During the first half of the twentieth century, the plantations continued to produce rice, sugar cane, and cattle. Another commercial crop, soybeans, was introduced later (Hunter 1991).

During the nineteenth century railroads began expanding across the region. The Sabine and Galveston Bay Railroad and Lumber Company was established in 1856 (Melvin 1996). Construction commenced on the rail line in 1858 on the outskirts of Houston with anticipated expansion to New Orleans. The name of the company was changed in 1859 to the Texas and New Orleans Railroad Company. Work continued on the railroad until events of the Civil War ceased construction. The line to New Orleans was finally completed and service from Houston to New Orleans began in 1880. Southern Pacific Railroad Company purchased the railroad in 1881 (Williams n.d). The railroad passed through multiple companies and ultimately merged with the Union Pacific Railroad in the 1990s (Yenne 1996). The railway system contributed to the growth and development of the region.

The proposed project area includes 85 acres of land that was formerly part of the Whitney Plantation. According to the Southeastern District of Louisiana Surveyor Generals' map, Jean Jacques Haydel Sr. owned Section 59 of Township 12 South, Range 18 East of the Southeastern District of Louisiana in 1786. Then in 1831, his son, Jean Jacques Haydel Jr, claimed the land in Section 17 which became the Whitney Plantation (Figure 2.3).

Jean Jacques Haydel was married to Marie Magdaleine Bozonier Marmillion and had eight children. The 1810 census indicates that he owned 56 slaves. Early descriptions of the plantation include the main house, slave houses, kitchen, storehouses, hen houses, rice mill, and additional buildings. The plantation yielded some of the largest crops of sugar cane in the region (*Louisiana Planter and Sugar Manufacture* 1892) with its highest yield in 1850 (Champomier 1850-1859). The family continued to own the plantation until 1866 at which time it was purchased by George Johnson from New York, who continued agricultural production on the property (Hunter 1991). Between 1880 and 1946, the plantation was owned by Pierre Edouard St. Martin, Théophile Perret, and later generations of their families. In 1946 it was acquired by Alfred Mason Barnes of

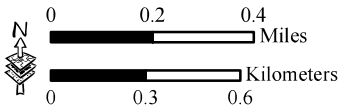


Project Location
St. John the Baptist Parish,
Louisiana

Legend

- Proposed Project
- Former Whitney Plantation Property Boundary
- Previously Surveyed
- Survey Areas
- Low Probability
- High Probability

Note: The 1837 historical topographic map has not been accurately georeferenced and therefore results in the slight misrepresentation of the survey area.



November 2020

Figure 2.3. Map of proposed project and survey area on 1837 plat map.

New Orleans who sold it to the Formosa Chemicals and Fiber Corporation in 1990. Formosa planned to build a \$700 million plant for manufacturing rayon in 1991. As part of the Formosa purchase the land including Whitney Plantation was surveyed for cultural resources by Coastal Environments, Inc (CEI) Hunter 1991). The Whitney Plantation was recorded as a site 16SJB11 and recommended as potentially eligible for the NRHP. The Whitney Plantation was subsequently nominated and listed on the NRHP in 1992. The portion of the Whitney Plantation found to be eligible and listed on the NRHP includes a 40 acre portion of the original property encompassing the main housing and operations center of the plantation and is located approximately 0.35 miles to the east of the current project area. In 1999, troubled by the way plantations have been romanticized by modern generations, New Orleans-based attorney John Cummings purchased 1,700 acres of land, a portion of which included the NRHP Listed Whitney Plantation property. John Cummings has restored portions of the property as a museum dedicated to telling the story of slavery. Portions of the property outside of the 40-acre NRHP-listed Whitney Plantation and determined to be not contributing to the NRHP significance of Whitney Plantation have been sold off to outside interests including the Robert Brothers Farm, LLC.

Robert Brothers Farm, LLC (Robert Brothers Farm or Robert Bros.) is a group of six individual limited liability companies, managed under a single entity own the subject property separate from the parcel now maintained as the previously mentioned museum and Whitney Plantation. The subject site for this project has been used for agricultural purposes since development. Since 2006, the group managed under Robert Bros. has owned the site and leased the site for agricultural and industrial purposes.

Exhibit F

**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 for:
Greenfield Exports, LLC

Prepared by:
Gulf South Research Corporation
8081 Innovation Park Dr.
Baton Rouge, LA 70820



LA DIVISION OF ARCHAEOLOGY REPORT NO. 22-6636-1
PURCHASE ORDER NO. 20200721-001
GSRC PROJECT NO. 80976002

A handwritten signature in black ink, appearing to read "Bretton M. Somers", is written over a horizontal line.

Bretton M. Somers, PhD, RPA
Principal Investigator

October 2021

ABSTRACT

This report provides an Addendum to the Phase I Archaeological Investigation of the Greenfield development on property known as Robert Brothers Farm in St. John the Baptist Parish, Louisiana (22-6636), previously submitted in December 2020. Gulf South Research Corporation (GSRC) was contracted by Ramboll US Consulting, Inc. (Ramboll) for Greenfield Exports LLC (Greenfield) to conduct an archaeological survey of additional acreage to address a revised layout for the proposed grain transfer facility on the Robert Brothers Farm, in Wallace, St. John the Baptist Parish, Louisiana. This addendum also provides additional information requested by the Louisiana State Historic Preservation Office (SHPO) in a letter dated 1/27/2021 and subsequent email dated 2/2/2021, including a viewshed analysis based on the proximity of the project to the Whitney Plantation National Historic Landmark (NHL), addressing a comment regarding potential odors due to off gassing from the proposed facility, updating a map of existing standing structures within the vicinity of the project and other figures that depict the APE to show an Indirect APE to include the Whitney Plantation NHL, and extending the Indirect APE to a 1.5 mile radius from the center of the project area.

The archaeological survey was conducted from May 17, 2021 through May 19, 2021, and June 7, 2021 through June 10, 2021. The revised project area encompasses approximately 89.7 acres of unsurveyed land that was not included with the original Phase I survey (22-6636). Portions of the revised direct area of potential effect (APE) overlap areas which were previously surveyed and included fields of new growth cane and wooded areas. The entire 89.7 acres were surveyed. A total of 223 shovel test pits (STPs) were pre-plotted across the survey area. Of these, 181 STPs were negative for cultural resources, 1 STP was positive for cultural resources, and 41 STPs were unable to be excavated due to water inundation or inaccessibility. One site, 16SJB75, the Willow Grove Cemetery was recorded outside of the direct APE and no isolated finds were recorded in the revised APE during the survey.

In addition, sites 16SJB57 and 16SJB73 were revisited to provide an update on their condition. A portion of the revised project APE overlaps the previously recorded site boundary of site 16SJB57. Site 16SJB57 was recorded in 1991 as the Mealaret (Mialaret) Mill site and was determined to be ineligible and not recommended for further work. During the most recent survey, 16SJB57 was revisited, no features were observed, and one shovel test was positive for cultural material including brick fragments. The cultural material recovered was consistent with the previous shovel tests. A surface scatter of domestic and architectural artifacts was also recorded. Site 16SJB73 was also revisited. The site was recorded during the original Phase I survey associated with this development project (22-6636). Additional research determined that the site is presumably the remains of the Horn Mill. A surface scatter of domestic and architectural artifacts was recorded. Both sites do not possess any integrity and remain ineligible for the National Register of Historic Places (NRHP). No further archaeological investigations are recommended. If archaeological material not related to site 16SJB57 or 16SJB73 is inadvertently discovered during the project construction, all work in that location should cease until a qualified archaeologist can examine and evaluate the nature of the uncovered remains.

A detailed viewshed analysis was performed to assess the potential for adverse visual effects from the project on the Whitney Plantation Historic District. The viewshed analysis for the Whitney Plantation NHL included development of figures based on photographs taken from multiple points within the NHL property and facing the project site, upon which a 3-dimensional model of the project elements, including the grain silo towers in the planned locations, was imposed. This method was utilized to generate images of the viewshed after construction of the project, thereby allowing a visual comparison of the “before” and “after” site line toward the project site from the NHL. The post-construction viewshed images demonstrate that the project will not be visible from the Whitney NHL from The Big House, Whitney Store, and other locations due to currently existing features such as shrubbery and trees within the NHL, and the mature stand of trees along the eastern portion of the Robert Brothers Farm property. At two locations, specifically the northwest corner near the Mialaret Buildings and the southwest corner of the District property, the uppermost portions the tallest structures of the project are projected to be seen above the stand of trees, against a backdrop that includes existing modern structures including the Veterans’ Memorial Bridge and a cell tower. Additional details of the viewshed analysis are presented in Section 7.0. Based on the limited extent of impact to the viewshed, as well as the existence of other substantive modern elements already existing in the vicinity of the Whitney Plantation NHL, the project would not result in an adverse effect to the integrity of the NRHP listed property’s aspects of location, design, setting, materials, workmanship, feeling, or association.

Within the extended Indirect APE of 1.5 miles, GSRC conducted a standing structure survey to identify any eligible or previously recorded historic standing structures for purposes of assessing the potential for indirect impacts. GSRC personnel accessed the Louisiana Historic Standing Structures Survey (LHSSS) to determine what previously recorded historic resources were located within the APE, as well as the NRHP online map. A total of 105 known resources were reviewed. Of these, 26 Louisiana Historic Resource Inventory (LHRI) forms were updated for structures still standing, and 79 buildings could not be located.

In addition, a total of 67 built resources were newly recorded. Of these newly recorded resources 32 were located along residential streets to the north and west of the project area, seven (7) were located within the Whitney Plantation Historic District, and 28 were associated with the Evergreen Plantation. Of the newly recorded built resources 39 were determined to be ineligible for the NRHP, two (2) were found to be contributing to the eligibility of the Whitney Plantation Historic District, and 26 are contributing to the eligibility of the Evergreen Plantation National Landmark. The newly recorded resources at the Evergreen National Landmark were previously known and described as contributing to the eligibility of the plantation in its original NRHP nomination, but this investigation filled out individual LHRI forms for each of the resources.

With submission of the final report, all records, photographs, and field notes will be curated with the State of Louisiana, Department of Culture, Recreation, and Tourism, Office of Cultural Development, Division of Archaeology. This material will be housed in the facility located at 1835 North Third Street, in Baton Rouge, Louisiana, 70802.

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ACKNOWLEDGMENTS

GSRC would like to thank Ramboll US Consulting, Inc. for the opportunity to conduct the current investigation. Additionally, GSRC thanks the cultural resources department including Dr. Bretton Somers Ph.D., RPA, who served as principal investigator and project manager, and Renee Erickson M.A., RPA who served as the field director for the project. The field archaeologists included Eve Carter, Mark Kudron Hathorn, and Hollie Lincoln. Ashlee Taylor, M.A., RPA performed the laboratory analysis, GIS analysts Christy Guempel and Marcela Guillot prepared graphics, and Ticia Bullion was responsible for report production.

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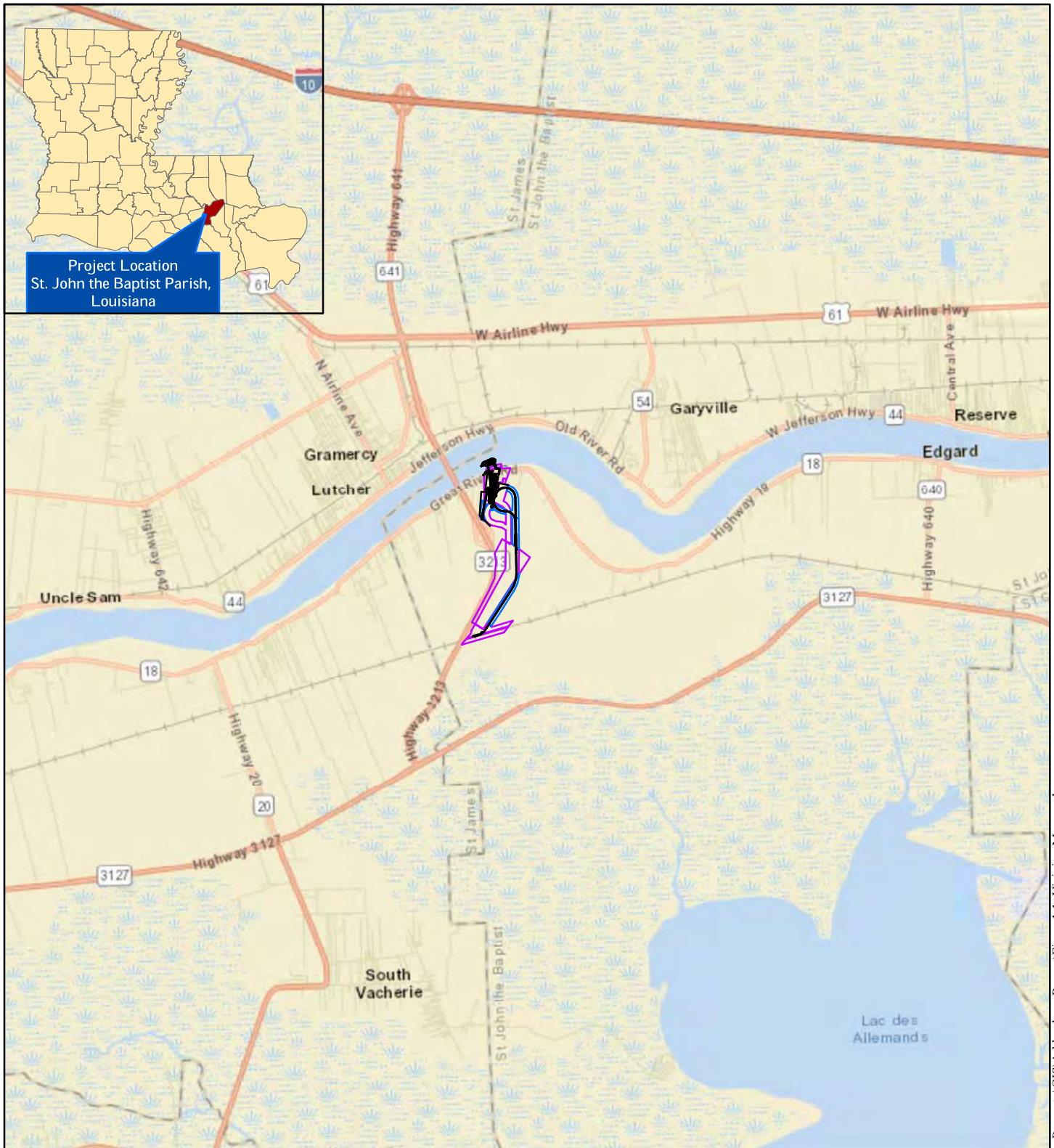
1.0 INTRODUCTION

This report provides an Addendum to the Phase I Archaeological Investigation of the Greenfield development on Robert Brothers Farm in St. John the Baptist Parish, Louisiana (22-6636), previously submitted in December 2020. Gulf South Research Corporation (GSRC) was contracted by Ramboll US Consulting, Inc. (Ramboll) for Greenfield Exports LLC (Greenfield) to conduct an archaeological survey of additional acreage to address a revised layout for the proposed grain transfer facility on the Robert Brothers Farm, in Wallace, St. John the Baptist Parish, Louisiana (Figures 1.1, 1.2, and 1.3). This addendum also provides additional information requested by the Louisiana State Historic Preservation Office (SHPO) in a letter dated 1/27/2021 and subsequent email dated 2/2/2021, including a viewshed analysis based on the proximity of the project to the Whitney Plantation National Historic Landmark (NHL), addressing a comment regarding potential odors due to off gassing from the proposed facility, updating a map of existing standing structures within the vicinity of the project and other figures that depict the APE to show an Indirect APE to include the Whitney Plantation NHL, and extending the Indirect APE to a 1.5 mile radius from the center of the project area.

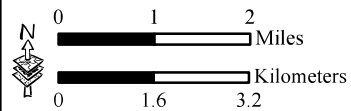
The project is subject to Federal Department of the Army Permitting under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act and is located in the Louisiana Coastal Management Zone. Therefore, a US Army Corps of Engineers/Louisiana Department of Natural Resource (USACE/LDNR) Joint Permit Application was filed on November 6, 2020, seeking authorization under these authorities. The USACE permit number is MVN 2014-01508-2 EMM. An updated Joint Permit Application was submitted on June 4, 2021 reflecting a revised site layout and is currently under review by USACE.

This investigation was conducted by professional archaeologists meeting the qualifications specified in the Secretary of the Interior's Professional Qualification Standards (*Federal Register*, Vol. 48, No. 190, Thursday, September 29, 1983, pp. 44738-44739). Dr. Bretton Somers served as the principal investigator for this investigation and is a Registered Professional Archaeologist.

The revised project layout results in 89.7 acres not previously surveyed within the Area of Potential Effect (APE) for direct impacts from the proposed project. The 89.7-acre area includes two components, an 86-acre revised rail spur and a 3.7-acre utility corridor (Figure 1.4). The direct impact APE includes the necessary area for construction of the grain export terminal, supporting utilities and infrastructure, as well as temporary construction impact areas for the lay down of material, parking of construction equipment, and maneuvering of construction equipment. The 86-acre APE for the rail spur includes a 400 ft-wide corridor connecting the development area with the existing Union Pacific Railroad to the south. The indirect APE was further considered for evaluation of historic resources within 1.5 miles of the project and expanded to include The Whitney Plantation Historic District.

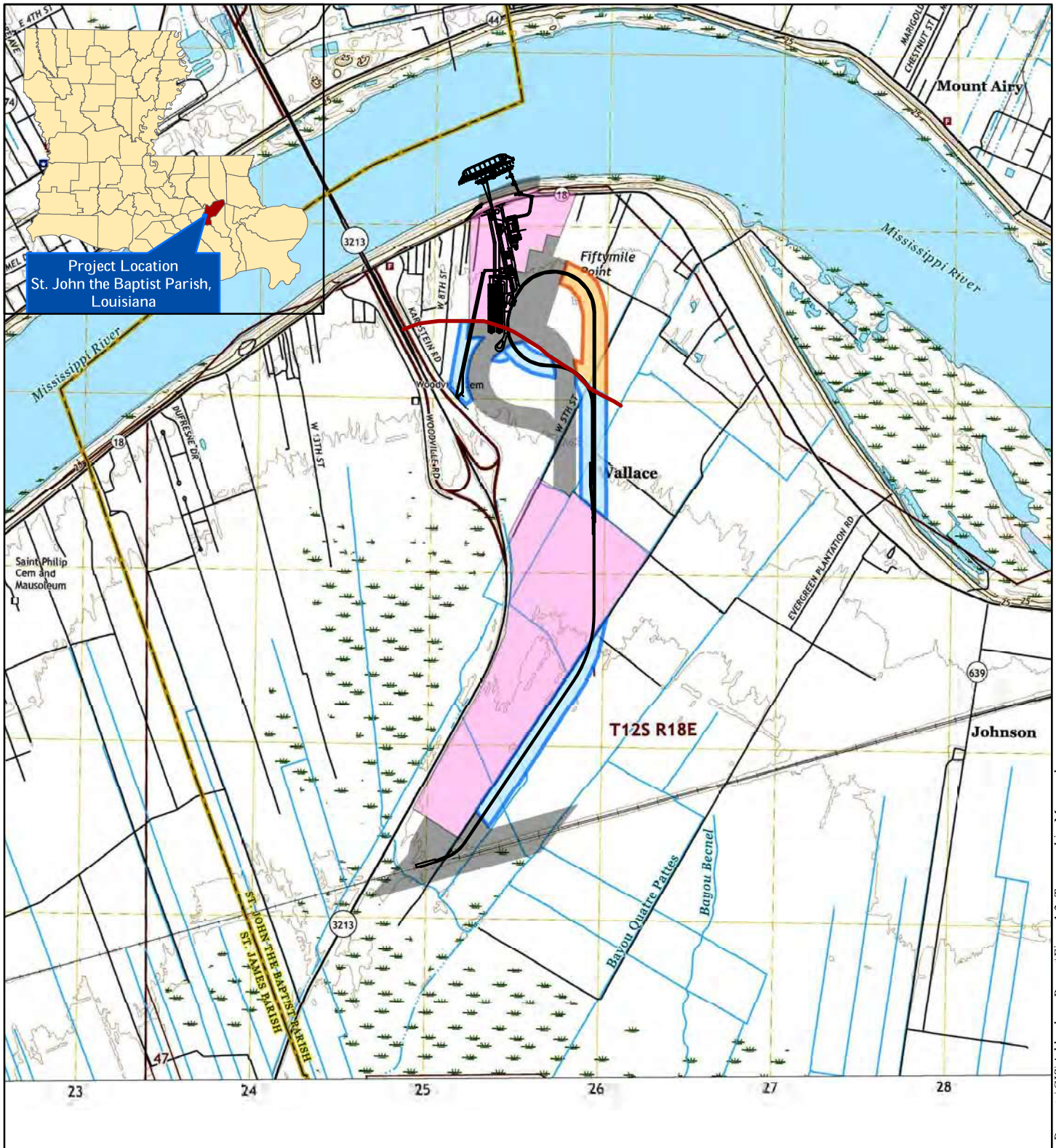


- Legend**
- Proposed Project
 - Survey Areas
 - Previously Surveyed



July 2021

Figure 1.1. Vicinity map showing project area.

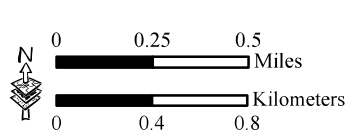


Legend

- Topographic Line
- Proposed Project
- Previously Surveyed by GSRC during Phase I
- Previously Surveyed by other entities

Survey Areas

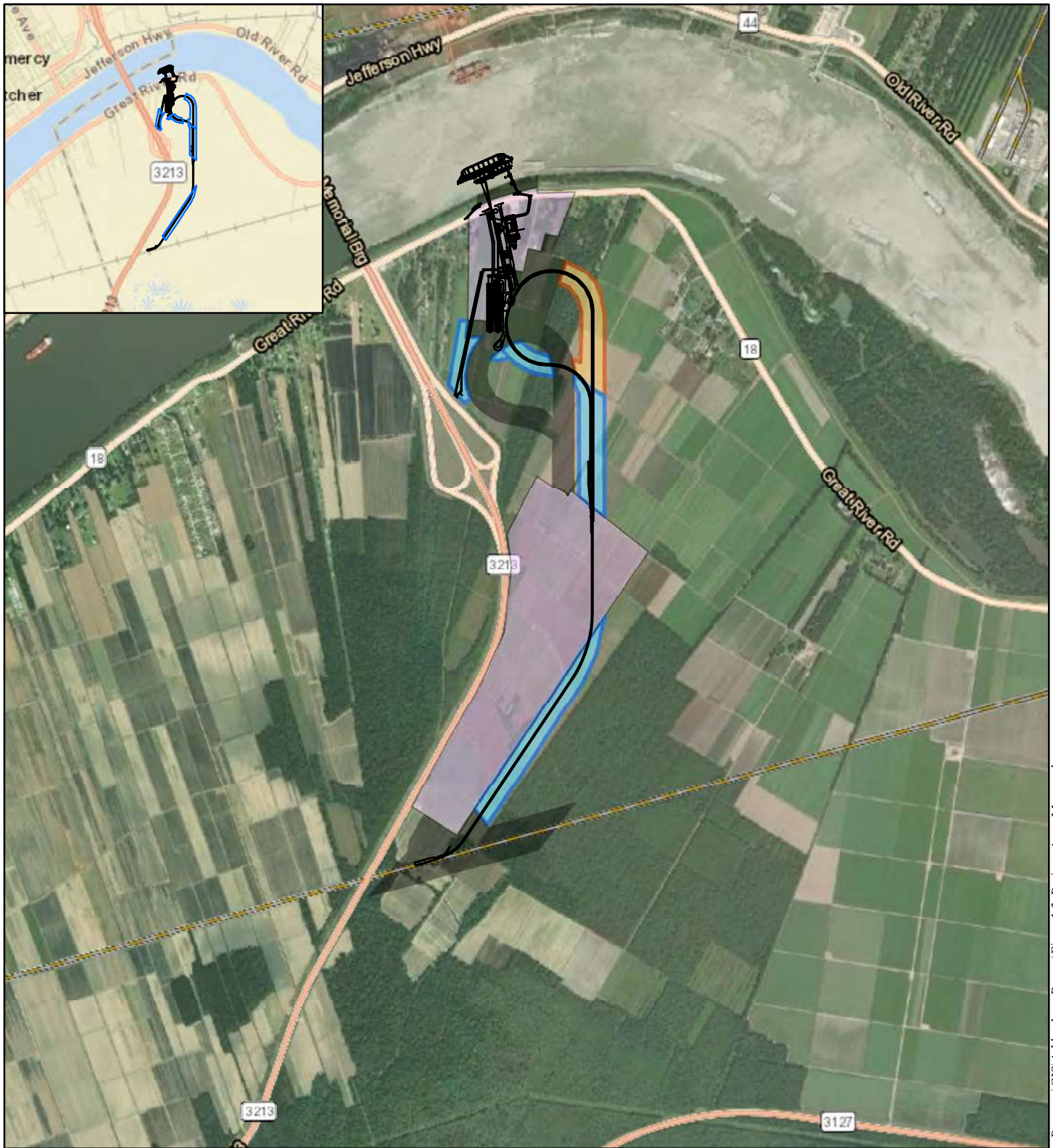
- Low Probability
- High Probability



July 2021

Figure 1.2. Map of project area adapted from the 2020 Lucher, Louisiana USGS 7.5' series topographic quadrangle.

K:\Projects\80976002_Rambol_Robert_Bros_Property\GIS\Addendum_Report\Figure 1.2_Topographic_Map.mxd



Legend

- Proposed Project
 - █ Previously Surveyed by other entities
 - █ Previously Surveyed by GSRC during Phase I
- Survey Areas**
- █ Low Probability
 - █ High Probability



0 0.25 0.5 Miles

0 0.4 0.8 Kilometers



July 2021

Figure 1.3. Map of project area adapted from 2020 aerial.



Figure 1.4. Aerial view of the project area, facing southeast.

The archaeological survey was performed from May 17, 2021 through May 19, 2021, and June 7, 2021 through June 10, 2021. The survey was led by Renee Erickson, MA, RPA who served as field director for the project. GSRC archaeologists Eve Carter and Mark Kudron Hathorn conducted the survey with assistance from Hollie Lincoln.

Within the extended Indirect APE of 1.5 miles, GSRC conducted a standing structure survey to identify any eligible or previously recorded historic standing structures for purposes of assessing the potential for indirect impacts. GSRC personnel accessed the Louisiana Historic Standing Structures Survey (LHSSS) to determine what previously recorded historic resources were located within the APE, as well as the NRHP online map.

This report is an addendum to the original Phase I cultural report (22-6636) and therefore does not include redundant information from the primary original report. Chapter 1 of this Addendum provides an introduction to the proposed undertaking and includes a description and background for the project. A description of the land use history for the project vicinity and a summary of investigations conducted prior to the original report are provided in Chapters 2 and 3, respectively, of the original report 22-6636. For consistency and ease of reference, Chapters 2 and 3 of this Addendum provide updates to the discussions of Land Use History and Previous Investigations, respectively, with updated Figures where appropriate. Chapter 4 describes the methods used in the updated archaeological survey and standing structure survey investigations. Chapter 5 details the results of the standing structure survey. Chapter 6 details the results of the archaeological investigation. Chapter 7 provides the methodology and results of the viewshed

8.0 SUMMARY AND RECOMMENDATIONS

Archaeological Survey

Gulf South Research Corporation (GSRC) conducted an archaeological survey of a revised layout for the proposed grain transfer facility on the Robert Brothers' Farm, in Wallace, St. John the Baptist Parish, Louisiana. The revised project area encompasses approximately 89.7 acres of previously unsurveyed land. A total of 223 STPs were pre-plotted across the survey area, among these 181 STPs were negative for cultural resources, 1 STP was positive for cultural resources, and 41 STPs were unable to be excavated due to water inundation or inaccessibility. One shovel test (T22-12) was positive for cultural material within the boundaries of site 16SJB57. The STP was not delineated due to its location. No prehistoric or historic artifacts were recovered. One site, 16SJB75, the Willow Grove Cemetery was recorded outside of the direct APE and is not listed in the NRHP. Site 16SJB57 and 16SJB73 were revisited to provide an update on the condition of the sites.

The update to site 16SJB73 concluded that the site consists of a moderate historic artifact scatter which extends beyond the original recorded boundaries of the site. The site is presumably the remains of the Horn mill, based on the structure present on historic maps and the content of the artifact assemblage. Artifacts observed on the surface, but not collected, include brick, stoneware, and whiteware. The site appears to be heavily disturbed from agricultural activity and does not appear to possess any additional information potential. This investigation supports the recommendation that 16SJB73 is ineligible for the NRHP and no further work is recommended at the site.

The update to site 16SJB57 concluded that the site also consists of a moderate historic artifact scatter which extends beyond the original recorded boundaries of the site. The site is presumably the remains of the Milaret Mill, based on the structure present on historic maps and the content of the artifact assemblage. Artifacts observed on the surface, but not collected, include brick, cobalt glass, colorless glass, green glass, scrap metal, and whiteware. The site appears to be heavily disturbed from agricultural activity and does not appear to possess any additional information potential. This investigation supports the recommendation that 16SJB57 is ineligible for the NRHP and no further work is recommended at the site.

No archaeological cultural resources that are recommended as eligible for the NRHP will be affected by construction of the proposed project. No additional archaeological investigations are recommended for the project area. If archaeological material is inadvertently uncovered during the construction of the grain transfer facility, all work in the vicinity of the discovery should cease until a qualified archaeologist can examine and evaluate the nature of the uncovered remains.

Standing Structure Survey

A standing structure survey was conducted to identify eligible or listed historic architectural structures within the Indirect APE in order to assess if there was the potential for effects on aboveground/architectural historic resources. GSRC personnel accessed the Louisiana Historic

Standing Structures Survey (LHSS) to determine what previously recorded historic resources were located within the APE, as well as the NRHP online map. A total of 105 previously recorded historic resources were identified; of these, 26 forms were updated for structures still standing, and 79 buildings could not be located and are presumed demolished or removed.

Standing structures on residential streets in the Indirect APE were reviewed. As the 1.5-mile radius delineating the Indirect APE included east and west banks of the Mississippi River, both banks were surveyed, although because of the height of the levees, distance from the proposed project site and relation to potential view, properties on the east bank were ruled out as being affected. On the west bank of the Mississippi River starting from the western perimeter of the Indirect APE, no known listed or eligible historic buildings were identified from Georgine Drive through Woodville Drive west of the Veterans' Memorial Bridge, or on Karlstein, Tassin or Victoria streets east of the Bridge. Three previously known resources were identified on West 9th Street; these properties are not NRHP eligible or listed resources. Moving east of W. 9th Street along LA-18, there are no known historic resources or eligible properties identified from Brown-Hymel Court through W. 5th Street. Along LA-18 west of the project site, six previously surveyed properties older than 50 years were identified. None of these properties are listed on the NHRP or determined eligible for inclusion.

Three previously known listed properties were identified within a 1.5-mile radius of the project. One of these properties, the Colonial Sugars Historic District is located on the East Bank of the River and is blocked from view of the project area by the Mississippi River Levee and the Veterans' Memorial Bridge. The Evergreen Plantation complex is located within the eastern boundary of the 1.5-mile Indirect APE radius. Multiple lines of trees block the view of the project area from Evergreen, and it is far enough away that it most likely will not be heard; therefore, there would be no adverse effect. The Evergreen Plantation is not considered within the viewshed of the project. The Whitney Plantation Historic District is a known listed NHL property located east of the project site within the boundary of the 1.5-mile Indirect APE radius and the subject of a detailed viewshed analysis.

In addition to the previously recorded resources revisited in this survey, a total of 67 built resources were newly recorded (Figure 5.1). Of these newly recorded resources 32 were located along residential streets to the north and west of the project area, of which none were determined to be eligible for listing. Seven (7) were located within the Whitney Plantation Historic District, of which two (2) were found to be contributing to the eligibility of the District. 28 newly recorded resources were associated with the Evergreen Plantation, of which 26 are contributing to the eligibility of the Evergreen Plantation National Landmark. The newly recorded resources at the Evergreen National Landmark were previously known and described as contributing to the eligibility of the plantation in its original NRHP nomination, but this investigation filled out individual LHRI forms for each of the resources.

Exhibit G



Midlo Center
for New Orleans Studies

THE UNIVERSITY of NEW ORLEANS

D. Ryan Gray
University of New Orleans
2000 Lakeshore Drive
New Orleans, LA 70148
27 December 2021

To: United States Army Corps of Engineers
New Orleans District
Regulatory Division (REG-E)
7400 Leake Avenue
New Orleans, Louisiana 70118
408# - 2021-0221
Project Manager: Scott Kennedy
Via email to scott.n.kennedy@usace.army.mil

Re: Permit Application # MVN 2014-01518-2 EMM

To Whom It May Concern:

My name is Ryan Gray, and I am an Associate Professor in the Department of Anthropology and Sociology at the University of New Orleans, and the Associate Director of the Midlo Center for New Orleans Studies. I am a historical archaeologist by training, with over 20 years of experience in both private cultural resource management and scholarly research on the archaeology of southeast Louisiana, including past field work in St. John the Baptist, St. James, Ascension, and Iberville Parishes. In addition, I work with the U.S. Defense POW/MIA Accounting Agency in the recovery of missing air crew from WWII aircraft crash sites in Europe. I am also a member of the Louisiana Antiquities Commission and the Louisiana Slavery and Ancestral Burial Ground Commission, although I submit this letter as a private citizen and scholarly researcher. Recently, we (at the Midlo Center and the UNO Department of Anthropology) have begun a collaboration with the Whitney Plantation Institute and the Descendants Project to assess previous archaeological research in the vicinity and to develop a new archaeological interpretive plan for the Whitney.

Earl K. Long Library, Suite 304 New Orleans, LA 70148

ph (504) 280-6144 fax (504) 280-6883

A member of the University of Louisiana System Committed to Equal Opportunity

I am submitting this letter in opposition to the proposed Greenfield Louisiana Terminal. While I think there are many concerns over adverse effects of this development to the surrounding communities, my comments here are based on concerns over its impacts to National Register eligible historic properties and on other significant cultural resources in the vicinity. This includes both specific archaeological concerns that I believe have not adequately been addressed in the Phase I archaeological survey and addendum that have been submitted by Gulf South Research Corporation and larger concerns about the long-term impacts to future multiple property and/or cultural landscape-related National Register nominations for this portion of the River Road in St. John the Baptist and St. James Parish. I have organized this discussion into two sections below, the first on cemetery impacts specifically, and the second more broadly on impacts to National Register eligible properties.

Impacts to Marked and Unmarked Cemeteries

One of the focal points of my research is the identification and preservation of unmarked cemeteries in southeastern Louisiana. When I reviewed the Phase I archaeological survey report and addendum prepared by Gulf South Research Corporation for Greenfield Exports, an immediate concern for me was the proximity of the mapped boundaries of the Willow Grove Cemetery (16SJB75) to the Direct APE of the proposed development. The boundary of the cemetery seems to have been drawn by GSRC only where there are extant above ground tombs (the earliest of which is from approximately 1919), despite the fact that there is a cleared tract that is very similar to the cemetery in surface conditions extending directly to the south¹.

In my professional experience, there are often additional subsurface burials past the limits of aboveground tombs in ancestral African American cemeteries, and the adjacent area to the south, which clearly extends into the project APE, seems an obvious high probability area for such graves to be located. While ostensibly this area was part of GSRC's survey area, it appears that, at most, they excavated 1 or 2 shovel tests extending no more than 50 cm below ground surface in the area. This would be completely inadequate to locate burial shafts or unmarked graves in such a locale. Only intensive survey methodologies combining remote sensing and mechanical stripping with community-engaged historical research and topographic analyses have been demonstrated to be effective at identifying the boundaries of cemeteries in similar cases.

Based on my preliminary research, there is even greater reason to expect that there could be additional subsurface components to the Willow Grove Cemetery, including in the area to the south of the one marked now. The Willow Grove Cemetery is almost

¹ It should be noted as a technical point that the boundaries of the cemetery were drawn differently on the site map submitted to the Louisiana State Site Files and the one shown in the GSRC Phase I Addendum report: in the Addendum Report, the boundaries appear to have been altered by a few meters so that the APE boundary does not intersect it, even though it clearly would intersect the corner of the boundary shown on the site form.

positively the location of the Mialaret Plantation's cemetery; the link between the Mialaret property and the Willow Grove name may be found in the CEI 1991 report on the archaeology of the Whitney tract, where, in the description of the Mialaret Main House, a wooden beam is marked with both the Mialaret name and Willow Grove. On a preliminary site visit, I noted that the "Willow Grove" for which the cemetery is named also extends to the south, and that both the presently marked cemetery and the unmarked area to its south are part of a long, narrow tract managed by the Willow Grove Benevolent Association. As far as I have been able to determine, this entire tract shares a similar developmental history, and I would consider its entirety to be extremely sensitive for the locations of unmarked enslaved or nineteenth-century post-Emancipation burials.

The lack of connection made between the Willow Grove tract and the historic Mialaret Plantation in the GSRC is very concerning. It is admittedly a challenge to locate unmarked cemeteries in southeast Louisiana, and archaeologists have a tendency to treat this as a technical problem, solvable by field investigations. The most troubling part of the GSRC report, and the issue that I think you should be most fully aware of in consideration of this permit application, is the apparent lack of communication with the local community about ancestral burial spaces in the area. The Willow Grove Cemetery is described as having an earliest grave dated 1919, and the most recent one in 2020, which GSRC interprets as indicating the cemetery is "likely still in use". I would certainly argue that this shows that the cemetery is actively use, that there is a community that has knowledge of it, and that would have concerns about construction impinging on the burial places of their loved ones and relatives. I should also point out that Louisiana law has a number of unique protections to cemeteries and burial sites, which have caused considerable issues for the agencies involved when the protections due to cemeteries are not adequately taken into account (as, for instance, in the case of St. Rosalie Cemetery in Plaquemines Parish, in addition to the well-documented examples in St. James Parish).

In my opinion, seeing that the GSRC archaeological testing methodology did not address the sensitivity of the Willow Grove Benevolent Association tract and apply specific methods appropriate to the identification of unmarked cemeteries, that there was no documented effort made to identify relatives or descendants associated with the Willow Grove Cemetery, and that the historical research did not address the connection of Willow Grove and the Mialaret Plantation, there are significant questions about the GSRC results. The Phase I has not demonstrated whether or not a subsurface cemetery component extends into the project APE. Given the sensitivity of human remains and cemetery sites, there should be a more comprehensive attempt to research the history of Willow Grove, from historical, genealogical, and archaeological perspectives. Similar concerns may apply to other portions of the project area; their omission here heightens the concerns elsewhere.

Other Cultural Resources and Impacts to Future Multiple Property National Register Nominations

The Phase I methodology employed during the GSRC survey was sufficient to identify and/or re-locate additional archaeological sites within the APE, including the locations of two historic sugar mill sites, the Mialaret Mill (16SJB57, originally identified during the 1991 CEI survey of the Whitney/Formosa tract) and the Horn Mill Site (16SJB73). These sites (and others) were assessed as being not eligible for the NRHP on the basis of the Phase I survey of those sites. The GSRC report also discussed numerous historic buildings within the vicinity of the proposed project footprint, including ones associated with the Whitney Plantation NR Historic District and the Evergreen Plantation, claiming in a simple viewshed analysis that the Greenfield development would not adversely affect them.

At the small scale, given the direct effects to 16SJB57 and 16SJB73 in the planned project, I think these sites deserve more formal Phase II evaluation, particularly given that a comparison of the spatial logic of the Horn Mill Site with that of the Mialaret Mill/Willow Grove Cemetery Sites suggests that there could be a cemetery located in association with it. However, a much broader concern is that each of these properties is assessed in isolation rather than as a part of the larger cultural landscape of sugar plantation enslavement and labor of which they are a part, and that this affects how integrity is determined for sites. For instance, while the Mialaret Mill Site, considered in isolation as an archaeological site, may have been impacted by agricultural development, its significance changes if it is assessed as a component of a complex of sites including the Mialaret Main House, the Mialaret Quarters, and the Willow Grove Cemetery (as the likely location of the Mialaret Plantation's antebellum cemetery).

The biases of the NRHP towards the exclusion of sites of significance to African American communities has been a considerable point of discussion in the historic preservation and compliance fields in recent years. A more comprehensive approach to the NRHP, in which sites are considered in relation to broader themes in multiple property nominations, has been suggested as one possible remedy to this inherent bias. We have been exploring the possibility of a multiple property NR submission for post-Emancipation sugar landscapes of the River parishes for some time. Such a submission would likely include both archaeological sites, individual standing structures, Freetowns founded at Emancipation, historic cemeteries and churches, fraternal organization halls, sugar mills, and civic facilities. The stretch of the River Road encompassing the community of Wallace, the Whitney and related sites like the Mialaret complex, and Evergreen Plantation, would be a good candidate for such a multiple property nomination, in that it retains numerous historic property types that would be significant to this period and theme, and that these properties maintain integrity because the lack of large-scale industrial development in this stretch has helped to maintain the feeling and association of those properties with the period of significance. Our collaboration with the Whitney and the Descendants Project was intended as an opportunity to explore this concept in more detail. The Greenfield development would so alter the historic fabric of this portion of the River Road that it would permanently adversely affect any future attempt to consider these properties as a unit.

Conclusions

The point of considering National Register properties in the compliance process is to protect sites that are important to understanding our nation's history and that are significant to the communities of which they are a part. While the Greenfield development will have impacts far beyond those to historic properties (including ones to what I believe is a significant wetland area to the west of the Willow Grove Cemetery, which I do not think has been mapped), the adverse effects to cemeteries and other significant cultural resources from it have not been adequately addressed. These efforts need coordination with local communities and a fuller consideration of how those sites relate to the larger cultural landscape of which they are a part. I hope that you will reject this permit based on those considerations.

Thank you for your time,

Ryan Gray, PhD, RPA

Associate Director, Midlo Center for New Orleans Studies

Richard Wallin Boebel Professor of Anthropology/Associate Professor, UNO Department
of Anthropology and Sociology

Exhibit H

From: Nicole Hobson-Morris
Sent: 10/25/2021 8:56:18 AM
To: 'Erin Edwards' <ese1316@gmail.com>
Subject: RE: The grain elevator project in Wallace

Hi Erin,
Thanks for reaching out. You have my respect for standing up for your professional reputation. I will let me colleagues know about this. Wishing you the best as you continue to prosper in this field. A better opportunity awaits.
Sincerely,
Nicole

From: Erin Edwards [mailto:ese1316@gmail.com]
Sent: Friday, October 22, 2021 4:05 PM
To: Nicole Hobson-Morris <nmorris@crt.la.gov>
Subject: The grain elevator project in Wallace

EXTERNAL EMAIL. Please do not click on links or attachments unless you know the content is safe.

Nicole:

I hope this email is not inappropriate to send you. If it is, please delete it. I wanted to let you know that I have resigned and today is my last day at GSRC.

The addendum report that I wrote for Roberts Brothers/Greenfields and the LHRI forms I filled out to accompany that report, are very different from the current version that should be coming to you soon. The current version of the report was written by the project manager and the client, playing architectural historian, and they have made eligibility determinations and conclusions in the report that I absolutely do not agree with.

Since my professional reputation in Louisiana is involved in this, I wanted to ask you to please be aware that my name, my degree, and my SOI qualifications should not associated with this revised report in any way.

Thank you,
Erin Edwards
ese1316@gmail.com
504-316-1850

40th JUDICIAL DISTRICT COURT
PARISH OF ST. JOHN THE BAPTIST
STATE OF LOUISIANA

J. Banner / Joy Banner

The Descendants Project, Jocynthia Banner,

and Joycia Banner,

Civil Action: 77305

Plaintiffs,

v.

Division C

St John the Baptist Parish, *et al*,

Defendants.

AFFIDAVIT

STATE OF LOUISIANA

PARISH OF ST. JOHN THE BAPTIST

We, Jo and Joy Banner, are plaintiffs in the above-captioned matter and hereby attest as follows:

As descendants of the enslaved and residents of St. John the Baptist Parish, we grew up surrounded by plantations and the problematic marketing of these sites as places of grandeur, rich with southern hospitality and sugar baron fantasies. The fact that these sites were prison labor camps for the thousands of enslaved people who were forced to live and work at plantations was rarely acknowledged or addressed. Currently, there is only one plantation in Louisiana, Whitney Plantation, that is dedicated to telling the true history of slavery, which opened only 6 years ago. As children, we were afraid to ask questions about our ancestors out of fear that we would be labeled as "trouble-makers" or that we would offend our White neighbors, friends, Church family, and school mates. As the plantation tourism industry grew

and welcomed hundreds of thousands of people to enjoy mint juleps and admire antique furniture, our ancestors were erased. Now as adults, we understand not only the injustice of robbing our ancestors of their place in history, but we must contend with the possibility of our ancestors being robbed of their final resting places.

It is not lost on us that the site of the proposed Greenfield site is the former location of three different plantations where Black people were valued only for their labor and crudely given worthless land to bury the bodies of their loved ones after they had literally been worked to the bones. We cannot explain the depth of our horror and pain to see the destruction by Greenfield of the sacred burial grounds of our ancestors. Despite evidence of burial grounds and rare historical artifacts, we believe that Greenfield continues its desecration of the land.

As evidenced by an email sent to Louisiana's State Historic Preservation Office, Greenfield discounted the expert opinion of a historic architect, hired by Greenfield to perform the required historical and cultural assessment of the site. According to the whistleblower, Greenfield conspired to omit her recommendations that the project should not move forward. We believe that Greenfield has done everything in its power to rob our community of its voice, denying us the right to information, colluding behind our backs with public officials, and robbing us of our rights as tax-paying property and homeowners. However, the blatant disregard of our ancestors' humanity by continuing these activities which can conceal and destroy the bodies and bones of our ancestors has been the most traumatic for us.

We learned about this grain terminal project in early 2021. After a year of pandemic that ravaged St. John the Baptist Parish, we were relieved to finally have the protection of a vaccine, particularly for my parents, who are in their late 70's. For a moment, we were able to breathe a sigh of relief. Unfortunately, it didn't last long. Our stress was compounded with the terror and psychological trauma of losing our homes and our historic neighborhood founded by our Great Grandparents. Despite our pleas for Greenfield to listen to us and for St. John the Baptist Parish to intervene, Greenfield exacerbated our emotional harm by violently driving pilings into the grounds, wrecking our nerves with the incessant noise and pounding. During the past year and a half, Greenfield has erected and positioned a massive 300 ft. crane approximately 100 feet from the base of the levee. Cranes frequently collapse and cause catastrophic damage.

But worst of all, the location of the pilings coincides with an anomaly on the site that could be burial grounds. We believe that Greenfield may be intentionally destroying burial grounds and we have no power to stop them. Despite an ongoing lawsuit, Greenfield has announced that they are proceeding with pile driving and construction on the site. To continue operations is cruel, inhumane, and emotionally abusive. We ask that you please issue a restraining order for this blatant disregard for the living and especially for our precious dead ancestors.

Jocynthia Banner
Jocynthia "Jo" Banner

Joyceia Banner
Joyceia "Joy" Banner

Thus sworn to and signed before me, the undersigned Notary Public, this 18th day of May,

2022
 SP-48-01
Notary Public



Affidavit

BOROUGH OF HACKNEY, LONDON
UNITED KINGDOM

6 December 2021

My name is Imani Jacqueline Brown, and I am an environmental justice activist and researcher with over ten years of experience; I am originally from New Orleans, Louisiana, and currently reside in London, United Kingdom. I received my Bachelor's degree in Anthropology and Visual Arts from Columbia University in 2010; in 2019, I received my Master's degree with distinction in Research Architecture from Goldsmiths, University of London. The Research Architecture MA program is affiliated with Forensic Architecture (FA), a research agency, based at Goldsmiths, investigating human rights and environmental violations including violence committed by states, police forces, militaries, and corporations. FA works in partnership with institutions across civil society, from grassroots activists and their legal advocates, to international NGOs and media organizations, to carry out investigations with and on behalf of communities and individuals affected by conflict, police brutality, border regimes and environmental violence. I served as an intern with FA during my studies (2018–2019) and have been employed by the agency as a researcher since October 2020. It is in this capacity that I am submitting this statement.

The following is my statement on the use of FA's research methodology to identify sites of potential historical and cultural significance that fall within one square mile of the proposed Greenfield Louisiana Terminal and that would possibly be impacted by the project.

In October 2020, I initiated a new FA investigation into the presence of unmarked antebellum Black cemeteries on the grounds of the sugarcane plantations that dominate the topography of Louisiana's River Parishes. Our endeavor was to develop a methodology to identify the probable locations of cemeteries across a broad geographic region. Because each antebellum plantation historically required at least one cemetery for its enslaved population (and some established as many as three), we recognized that hundreds of significant historic sites remain to be recovered so that they can be commemorated, researched, and protected from destruction by new development.

Through our research, which is summarized below, we identified nearly 1,200 so-called 'topological anomalies' – sites of interest that could indicate the presence of antebellum cemeteries or other historic properties, including slave quarters or other plantation structures – across a 60km area consisting of parts of Ascension, St. James, and St. John the Baptist Parishes.

Topological Anomalies

Denied material for headstones, the enslaved populations of antebellum sugarcane plantations used wood to craft simple grave markers; the organic materials decomposed over time, leaving no topographical traces. Through multiple primary and secondary sources, among them archaeology reports submitted to the Louisiana Division of Archaeology, scholarship, and the WPA's Ex-Slave Narrative Project, we learned that the enslaved also planted magnolia and willow trees to mark the graves of their loved ones.¹ This practice was likely a form of cultural retention of pan-African

¹ ERM et al., 'Monroe/Houmas (Site 16AN31) and Bruslie/Brulé (Site 16AN32) Plantations Phase I/II Cultural Resources Investigations Ascension and St. James Parishes, Louisiana', 11–55.

traditions of associating specific trees with important spiritual, cultural, and civic functions.² These groves of trees are often the only surface traces of antebellum Black burial grounds.

Before a cluster of trees or other patch of uncultivated land is confirmed to be a cemetery or other historic property, archaeologies refer to it as a 'topological anomaly', indicating that its presence is anomalous in a seamless topography of sugarcane fields. According to archaeological firm Coastal Environments, Inc. (CEI):

Generally speaking, farmers did not plow certain areas for a reason. For example, ground containing the massive brick foundations of a former sugarhouse (not visible on the surface) would be avoided to prevent damage to farm equipment. A low, wet area with willow trees in an otherwise plowed field could be all that remains of a former sugarhouse pond. Likewise, a small stand of trees in a plowed field might be avoided because it contained headstones or was known to have been a cemetery.³

In 2015, CEI conducted an archaeological survey of the Houmas/Monroe, Union, and Bruslie/Bruly Plantations, identifying three cemeteries holding the remains of historically enslaved Black people.⁴ Each of these cemeteries appear in either contemporary satellite imagery or historic aerial imagery as an anomalous grove of trees. In 2019, an additional survey of the Lauderdale, Elina, Acadia, and Buena Vista Plantations, also conducted by CEI, identified four mapped cemeteries that appear in aerial imagery as groves of trees.

Sources

To identify anomalies across a broad geographic region encompassing hundreds of plantations at once, we needed to piece together the cartographic record. The 19 February 2020 report that resulted from CEI's 2019 survey provided us with an important starting point. The earliest cartographic record that Forensic Architecture has located, and that depicts in detail structures, roads, the forest, plantation boundaries and plantation owners, as well as crop classification, is the postbellum US Coast Survey manuscript set, a survey that was conducted during the Reconstruction era between 1876-1877. It is comprised of several topographic sheets (T-Sheets) that cover the lower Mississippi River from Point Houmas (westernmost / upriver) until New Orleans and its surroundings (easternmost / downriver). This manuscript edition was published in 1878 in a form excluding crop classification, making it easier to analyse than the 1877 edition. It is this latter set (referred to herein as 1878 USCS) that I use as a reference in this submission.

Alongside the map series, several sets of aerial photographs covering the area of study have been sourced and obtained. The earliest series of aerial photographs that we have located dates back to 1940, and was captured by the U.S. Department of Agriculture (referred to herein as 1940 USDA). FA subsequently sourced aerial imagery of the area for six additional decades. This document references images taken in 1970 and sourced from the US Geological Survey (referred to herein as 1970 USGS), as well as images sourced from Google Earth for the year 2019 (referred to herein as GE 2019). The variation in scales, colour ranges, and resolutions among the different images means that some aerial sets offer greater legibility and therefore are more immediately useful than others, which require alternate means of enhancement and translation.

² See, e.g. Michael J. Sheridan and Celia Nyamweru, *African Sacred Groves* (Oxford: James Currey, 2008).

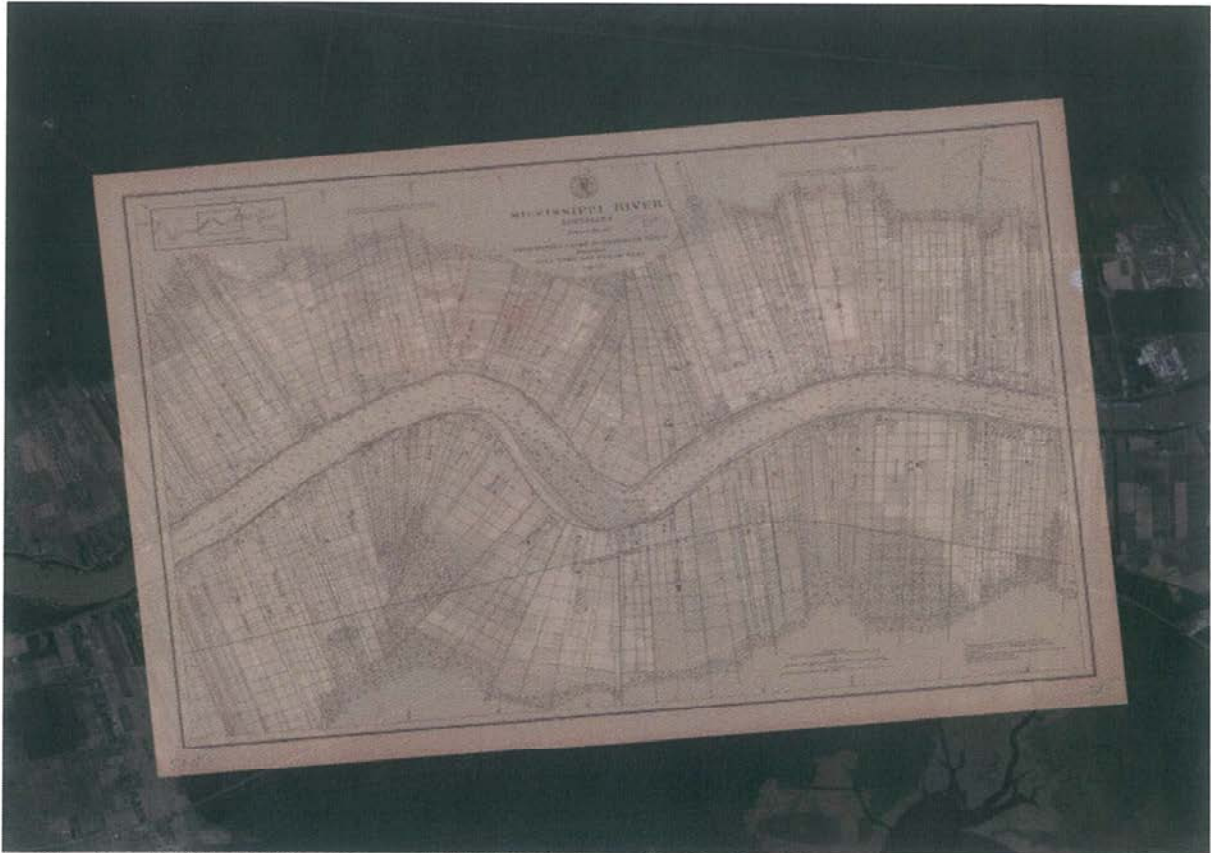
³ Coastal Environments, Inc., 'Cartographic Regression Analysis of Certain Tracts of Land Located in T.11S and T.12S., R.15E. (Southeastern Land District West of the Mississippi River), St. James Parish, Louisiana'. February 19, 2020: 7.

⁴ ERM et al., 'Monroe/Houmas (Site 16AN31) and Bruslie/Brulé (Site 16AN32) Plantations Phase I/II Cultural Resources Investigations Ascension and St. James Parishes, Louisiana'.

Methodology

To process the cartographic resources and imagery that have been sourced and obtained, FA has employed a methodology called 'cartographic regression'. Cartographic regression refers to the process of using historical surveys, maps, and aerial photographs overlaid on contemporary imagery in order to track changes in the territory and 'determine how past landscape elements correspond to those in the modern world.'⁵ Cartographic regression is increasingly used in archaeological surveys as a method of evaluating probable locations of cultural resources. Archaeological researchers utilise manual overlays and adjustments to 'get the [two] images to the same scale and orientation'.⁶ Coastal Environments, Inc.'s 2020 report is the most thorough example of the technique's application that we have encountered in our research.

While the use of this methodology for localised studies is increasingly common, FA has enhanced this methodology by employing a spatial technique that allows the flexible handling and superimposition of hundreds of different images covering a much larger area than what a 'photographic overlay' would allow. This technique includes the clipping, *mosaicing*, and *georeferencing* of images within QuantumGIS (QGIS), an open-source Geographic Information System computer application.⁷

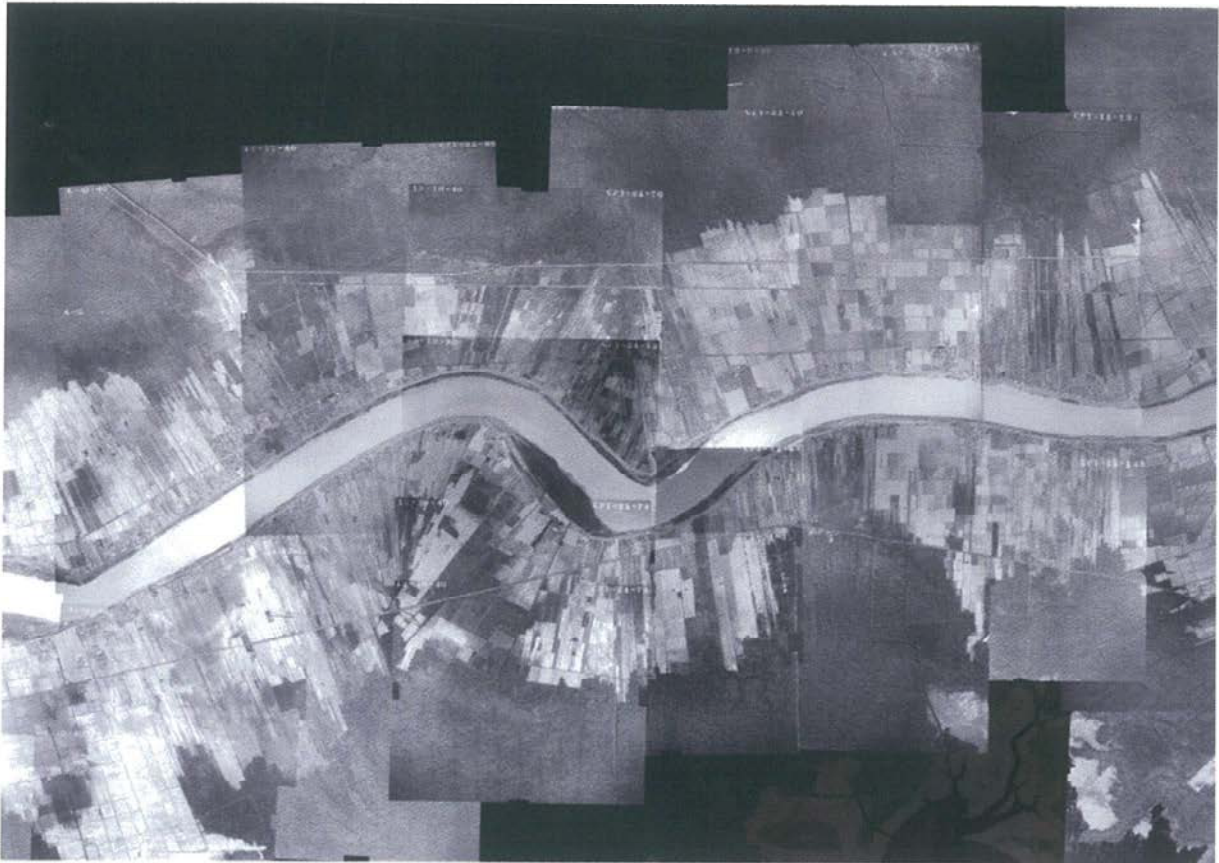


Sheet no. 11 of the US Coast Survey (USCS) 1878 chart of the Mississippi River, which covers the location of the proposed Greenfield Louisiana Terminal.

⁵ 'Coastal Environments, Inc., 'Cartographic Regression Analysis of Certain Tracts of Land Located in T.11S and T.12S., R.15E. (Southeastern Land District West of the Mississippi River), St. James Parish, Louisiana', 7.

⁶ Coastal Environments, Inc., 7.

⁷ <https://qgis.org/>



A sample of our georeferenced mosaic of aerial images captured in 1940 by the US Department of Agriculture (USDA) covering the same geographic area as the previous image.

Mosaicing is the process of stitching together different aerial images that have overlapping coverage. The technique is similar to 'panoramic photomerge', and can be done through various projection systems, in order to ensure that no or minimal distortion is achieved. The process of blending together the images facilitates the subsequent stages of the georeferencing, as the georeferencing is then applied to fewer images (the mosaics) than would have been required without the photomerge.

Georeferencing refers to the technique of assigning geographical information (location data) to an aerial or satellite image, a scanned survey, photograph, or map, so that any Geographic Information System application or other mapping software can accurately 'place' the image within a geographical frame of reference. The geographical frame of reference that has been the main basis for all the images in this research is the 2019 GE satellite imagery. The georeferencing technique is processed internally within the QGIS, using its 'Georeferencer' tool, by assigning pixels on the images to specific locations in the frame of reference. When enough reference points have been assigned, the application adjusts the rotation and scale of the image in order to accurately place it within the selected geographical frame. If corrections are required to reach a precise overlay, the process is repeated, and this technique is then replicated for all the other aerial images. For the purposes of this submission, the sources that required georeferencing were the 1878 USCS historic map and the aerial imagery from the 1940 USDA and 1970 USGS aerial sets. The GE 2019 set already contained exact geographical information. The maps and imagery then appear as layers within the QGIS application, and their visibility can be flexibly adjusted or toggled on and off, in order to facilitate their analysis.

Once georeferenced, the 1878 USCS maps were analysed. We created vector lines and polygons for the various plantation components. First, we outlined and classified property borders, canals, roads, the main plantation road (central axis), and field paths. We then outlined structures, classifying slave quarters and postbellum housing, sugar mills and other outbuildings, and when discernible, the slave master's big house.

The 1940 and 1970 aerial image sets (along with sets from additional years not considered in this submission) were then analysed for the presence of anomalies. We drew vector polygons atop the approximate areas of groves of trees and other anomalous manifestations of uncultivated land.

Vector shapes drawn from maps and aerial images can be overlaid atop the various map and aerial image sets, which span across a period of 140 years. This mode of visualization enabled us to analyse the historic sites and anomalies amid changing topographical conditions and a vector shape representing the proposed 'Project Limits of Disturbance'.⁸

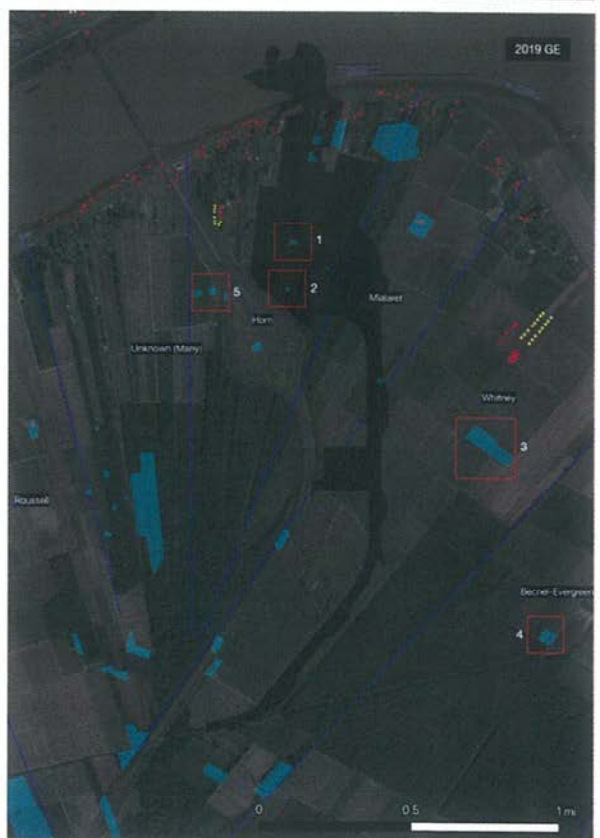
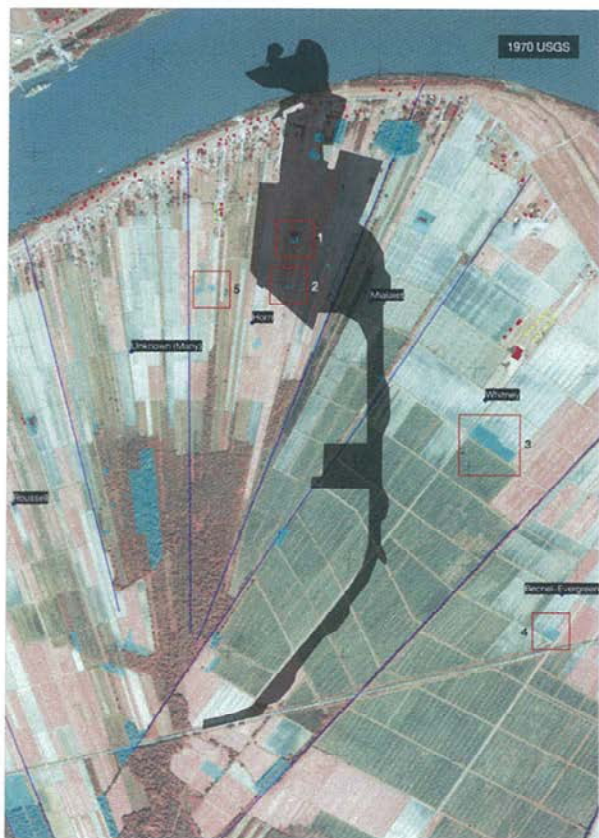
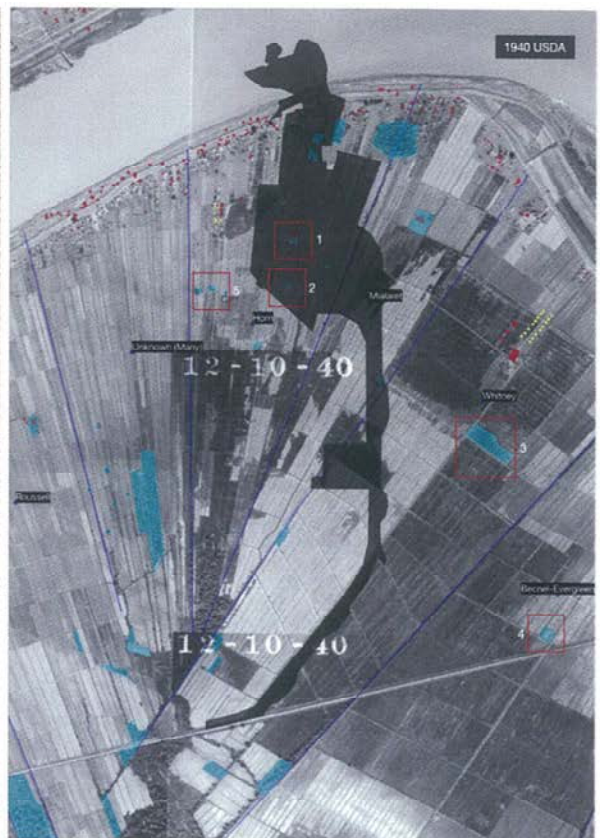
To determine the probable locations of cemeteries, we needed to understand the distinctive spatial logics that were introduced by French colonists and which carried across the French plantations of the River Parishes in a broadly consistent fashion. Historically, the locations of industrial facilities and housing for the plantation's enslaved labor force (which together make up the industrial complex) were chosen with efficiency of production and profit for the slave master in mind. The industrial complex was thus sited along the main plantation road, which mostly followed the central axis of the property. Through our cartographic analysis, we have found that cemeteries of the historically enslaved have a spatial relationship with industrial complex and are most often located a short distance from the complex, in the direction of the backswamps. While most cemeteries (as well as many sugar mills and slave quarters) are not mapped, anomalies that follow these spatial logics have a higher probability of being cemeteries or the ruins of the industrial complex.

Anomalies Potentially Impacted by the Greenfield Louisiana Terminal

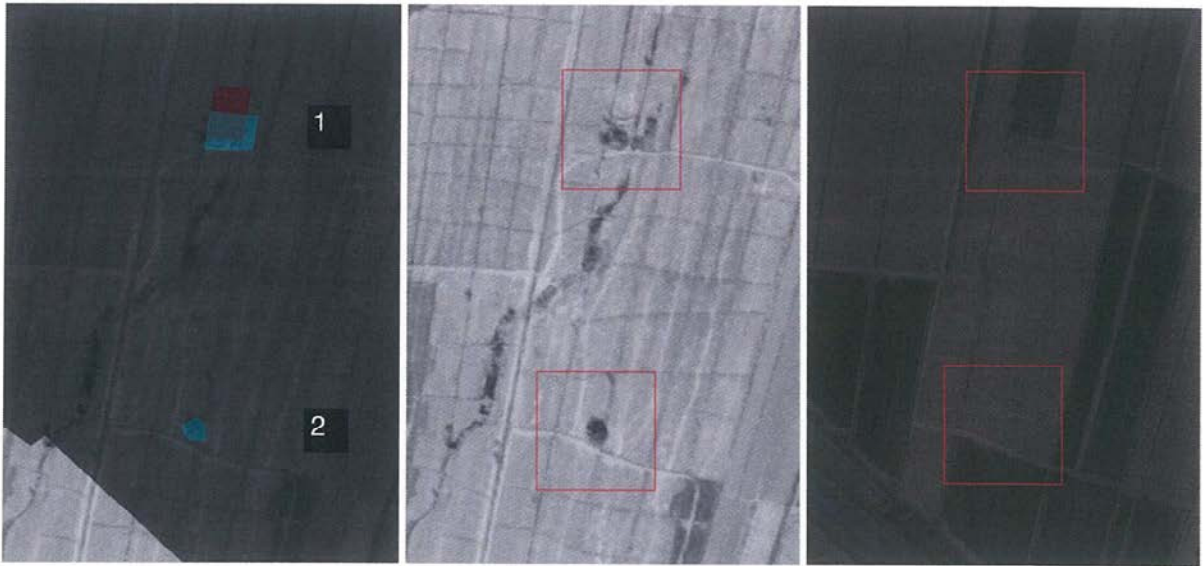
Nearly three dozen of these anomalies exist within one square mile of the 'Project Limits of Disturbance'. The images below show anomalies identified by FA within one square mile of the Project Limits of Disturbance. The anomalies within red bounding boxes are of particular interest due to their conformance to plantation spatial logics, and I provide a summary analysis below.

The subsequent image triptychs feature: 1. at left, a map with a base of the 1940 USDA aerial image, plus vector shapes representing the project limits of disturbance, historic structures, and anomalies, 2. at center, a 1940 USDA aerial image of the same site with anomalies in bounding boxes, and 3. at right, a 2019 GE satellite image with anomalies in bounding boxes.

⁸ Derived from the Site Location Map of the Public Notice from the US Army Corps of Engineers. See: United States Army Corps of Engineers, New Orleans District, 'Joint Public Notice,' 1 March 2021.

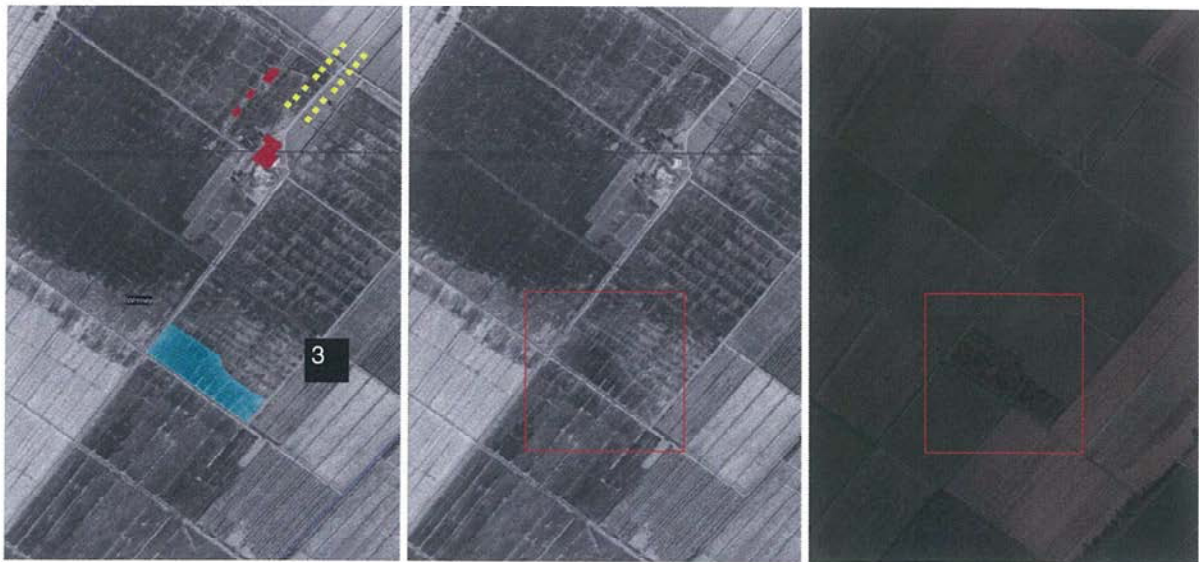


Anomalies 1 & 2



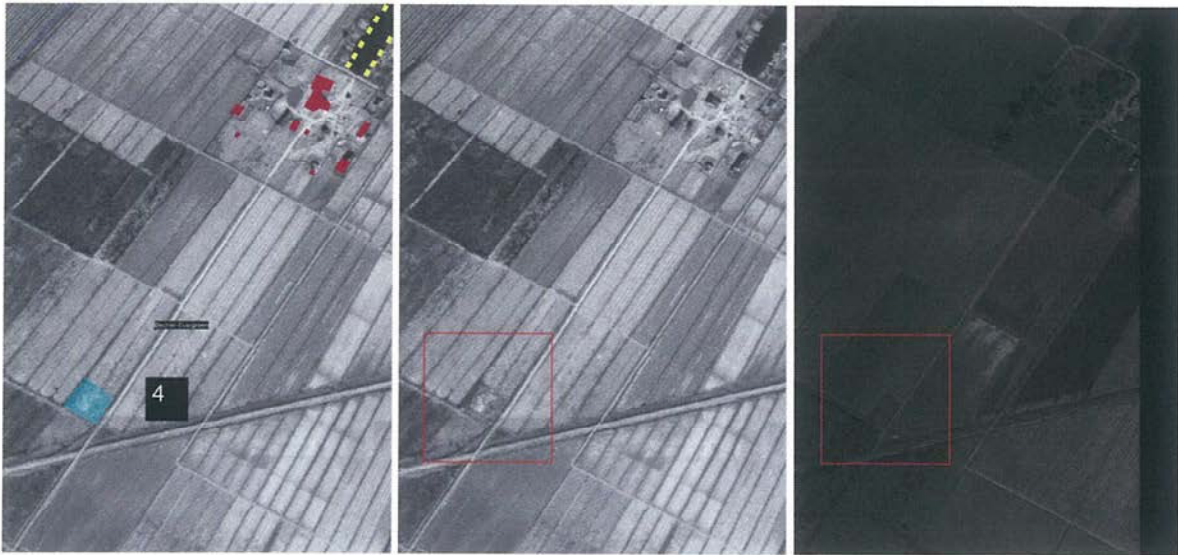
Through cartographic analysis, Anomaly 1 is revealed as the ruins of the historic sugar mill. Anomaly 2, consisting of a single tree, lies a short distance to the south. Its location is consistent with the spatial logics of antebellum cemeteries.

Anomaly 3



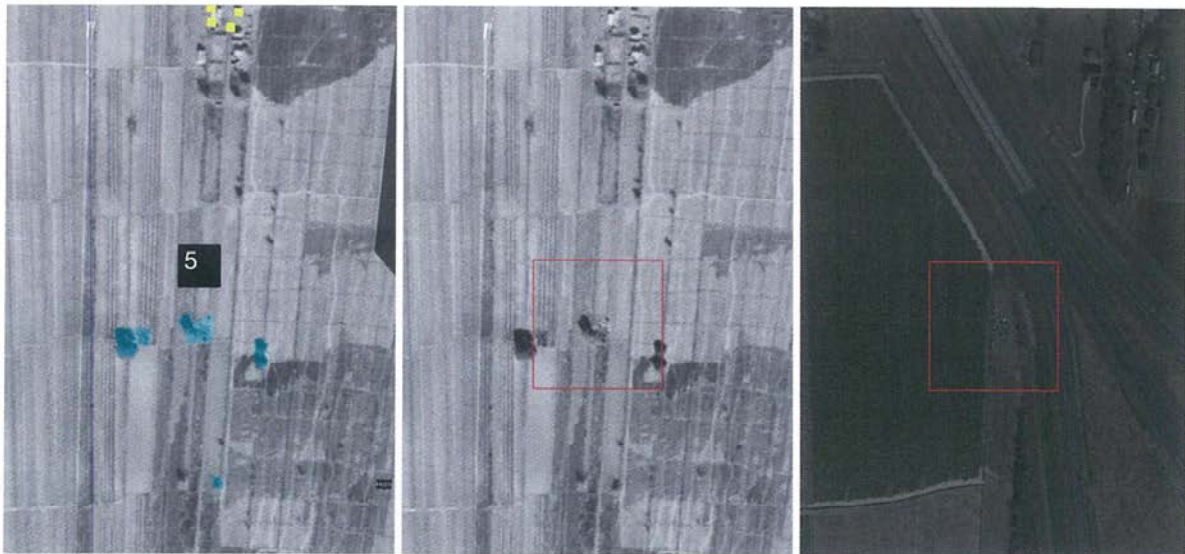
Located around 0.25 miles from the downriver edge of the Project Limits of Disturbance is an anomaly of interest on the former Whitney Plantation. Given its proximity to the mapped industrial complex, there is a high probability that this anomaly is a cemetery. Anomaly 3 is interesting for its faint outline in 1940 compared to the thick vegetative growth filling the perimeter in 2019.

Anomaly 4



Anomaly 4 has a similar spatial logic as Anomaly 3. Anomaly 4 is an example of an uncultivated patch without tree or other vegetative coverage.

Anomalies 5-8



There are several anomalies within this frame, but Anomaly 5 is of particular interest; one can see numerous above-ground crypts in the 2019 image at right. After Emancipation, many formerly enslaved people continued to live and work on the plantations of their former enslavement; they often continued to live in the former slave quarters, forming small rural freetown communities. In many instances, for example the Houmas/Monroe Plantation Cemetery surveyed in 2015, they maintained a connection with the plantation cemeteries. Now free, they were able to purchase or craft stone grave markers and crypts. Due to the plantation spatial logics it evinces, Anomaly 5 is likely another such example of an antebellum cemetery in continuous use in the postbellum era.

Conclusion

These and other anomalies we have identified require further analysis before we come to definitive conclusions. We have documented anomalies of various typologies, recognizing that not all of them are likely to be cemeteries. A critical step in the search for erased cemeteries is to piece the plantation back together, and anomalies representing ruined structures can help us with this process, and also hold immense historical and cultural value – for preservation, research, and education – in their own right. No anomaly is too large or too small to hold archaeological value.

While we identified nearly 1,200 anomalies in the 1940 aerial mosaic spanning 60km, just shy of 350 anomalies were identified in the mosaic of 2019 Google Earth satellite images. Hundreds of anomalies throughout the region have likely already been impacted by development activities, which may range from plowing to the construction of industrial facilities. Furthermore, we must keep in mind that our search for anomalies in the 1940 aerial image set cannot be considered comprehensive. Many anomalies may have been erased from the land by plowing or other development activities prior to the capture of the 1940 aerial images. The erasure of surface elements does not erase the value and consequence of the subsurface portion of the site, or the sacred quality of the site for the descendant community.

Urgent action must be taken to prevent further impact to Louisiana’s cultural, historical, and ancestral treasures.

IMANI JACQUELINE BROWN



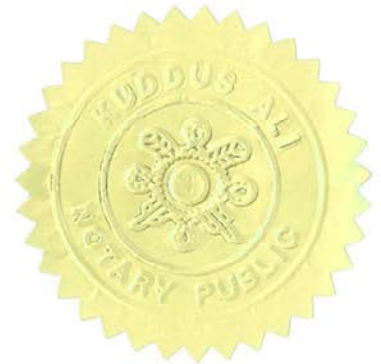
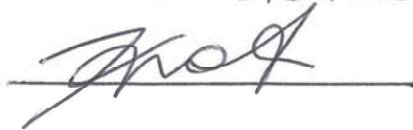
I Kuddus Ali, Notary Public for England and Wales certify that this document was executed in my presence as a deed according to English Law.

Signed and executed by: IMANI JACQUELINE BROWN

of (address): 42 Osbaldeston Road
N16 7DR

Identified by (document and number): USA PASSPORT : 575976432

Date and signature of Notary Public:



08 DEC 2021



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