

APPENDIX C
LOUISIANA SHPO CONCURRENCE LETTERS



Perennial Environmental Services, LLC
4425 Mopac South, Building II, Suite 204
Austin, TX 78735

May 23, 2016

Mr. Phil Boggan
Assistant Secretary
Louisiana Office of Cultural Development
P.O. Box 44247
Baton Rouge, LA 70804-44247

RE: Bayou Bridge Pipeline, LLC
Final Report Submission
Bayou Bridge Pipeline Project (Report No. 22-5173)
Acadia, Assumption, Calcasieu, Iberia, Iberville, Jefferson Davis, Lafayette, St. Martin, St. James, and
Vermillion Parishes, Louisiana

Dear Mr. Boggan:

On April 4, 2016, Perennial Environmental Services, LLC (Perennial) submitted the draft report: *A Phase I Cultural Resources Survey of the Bayou Bridge Pipeline, LLC Bayou Bridge Pipeline Project*. On April 14, 2016, Perennial received a letter from the Division of Archaeology (Division) concurring with the findings of the report and providing editorial comments. The enclosed two hard copies and one PDF copy of the report addresses the comments of the Division and is considered the final report.

Bayou Bridge Pipeline, LLC (BBP), retained Perennial to conduct a Phase I cultural resources survey for the proposed Bayou Bridge Pipeline Project (Project). The Project consists of the construction of approximately 260.93 kilometers (km) (162.07 miles [mi]) of new 24-inch (in) diameter crude oil pipeline that will commence south of Lake Charles in Calcasieu Parish, Louisiana and will terminate near St. James in St. James Parish, Louisiana. The 260.93-km (162.07-mi) pipeline is comprised of a 259.13-km (160.95-mi) mainline and a 1.80-km (1.12-mi) lateral. The proposed Project also involves the construction of two pump stations and other ancillary facilities along the proposed pipeline. The pump stations will be located near milepost (MP) 42.5 and MP 98.9 in Jefferson Davis and St. Martin parishes, respectively.

We appreciate your assistance with this Project. As outlined in the attached report, an addendum report for the Project encompassing the remaining survey areas is still forthcoming. Should you have any questions or require additional information, please do not hesitate contact me at (512) 358-0340 or by email at zoverfield@perennialenv.com.

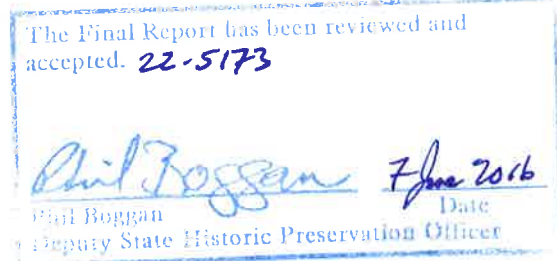
Sincerely,

Zachary Overfield, MA, RPA
Archaeologist/Principal Investigator
Perennial Environmental Services

RECEIVED

MAY 27 2016

ARCHAEOLOGY





BILLY NUNGESSER
LIEUTENANT GOVERNOR

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

RENNIE S. BURAS, II
DEPUTY SECRETARY

PHIL BOGGAN
ASSISTANT SECRETARY

14 April 2016

Zachary M. Overfield
Archaeologist/Principal Investigator
Perennial Environmental Services, LLC
4425 South Mopac, Building II, Suite 204
Austin, TX 78735

Re: Revised Draft Report

La Division of Archaeology Report No. 22-5173

Phase I Cultural Resources Survey of the Bayou Bridge Pipeline, LLC, Bayou Bridge Pipeline Project, Acadia, Assumption, Calcasieu, Iberia, Iberville, Jefferson Davis, Lafayette, St. Martin, St. James and Vermilion Parishes, Louisiana

Dear Mr. Overfield:

We acknowledge receipt of your letter dated 4 April 2016 and two copies of the above-referenced report. We have completed our review of this report and offer the following comments.

In Appendix I, wrap-text needs to be applied to the Specimen Description column as many of the longer descriptions are truncated on the page.

In the artifact discussions for many sites, there is a persistent discrepancy between what is described in the text as being from the site, and what is actually listed in the report tables and Appendix I. The discrepancy appears to reflect the uncollected surface materials being excluded from the tables and appendix, but there is no corresponding assessment of the materials that were observed but not collected (as per the Methods page 28). Although the Methods state that surface materials that were not collected were counted, it appears from the various site descriptions that that was not realized. In the apparent absence of counts of uncollected materials, it would be helpful to clarify in the discussions what was observed; i.e., the majority of the ceramics were plain whitewares with only occasional examples of stoneware and porcelain. Site 16SM129 (page 291) is a good example of this approach. Or perhaps an additional row could be added to the respective site artifact table that would refer to the "observed surface materials" with the description being something like that suggested above. It would also be appropriate to amend the Methods discussion to reflect the process that was actually implemented in the field.

Examples of this situation include:

The Artifact Analysis (and Figures 5.41 and 5.42) for 16VM79 notes many more artifacts than are presented in Table 5.11 and Appendix I. What are the relative abundance and identifications of the (presumably) surface materials?

The Artifact Analysis section for 16JD49 indicates that historic ceramics, ferrous metal and construction materials were present, but none of these are included in Table 5.5, Figure 5.24, or Appendix I. If they were not collected please state that, along with their identifications (see above), but we note that the Methods section states that 10% samples of non-diagnostic materials and construction materials would be collected.

The discussion of 16VM80 states that a general surface collection was undertaken, but the results of this effort are not listed in Table 5.14 or Appendix I.

The discussion of 16LY148 includes artifacts, also shown on Figures 5.56 and 5.57, which are not included in Table 5.18 or Appendix I, and not otherwise recorded or described. The same situation applies to 16LY150.

There is also an inconsistent approach in how site assemblages at many of the sites are described. For example, at 16SM122 (bottom of 2nd column on page 209), the uncollected assemblage is described as including plain and transfer-printed whitewares. However, the first sentence of the Artifact Analysis section says that only transfer-printed whitewares were identified at the site. The latter sentence appears to be referring only to what is in the collected assemblage, but it is confusing to refer to that as the “identified assemblage”, when in fact other materials were identified at the site. Clarification of language in each of the site discussions would be helpful.

One of the shovel test numbers is incorrect in Table 5.11 and Appendix I (assuming there were two positive ST’s as stated in the text).

Bag 16 is missing from Table 5.34.

If a site form was not completed for the Bodoyn Cemetery, we would appreciate receiving one. Our office is trying to record all cemeteries as sites as one means of tracking them.

Our office concurs that the following sites, or the portion of these sites within the project area, are not eligible for nomination to the National Register of Historic Places: 16CU90, 16JD58, 16VM79, 16VM80, 16LY148, 16LY149, 16LY150, 16LY151, 16IB170, 16IB171, 16SM121, 16SM122, 16SM123, 16SM124, 16SM125, 16SM126, 16SM127, 16SM128, 16SM129, 16JD10, 16JD49, 16AC63, 16AC64, 16VM73, 16LY139, 16IV3, and 16AS54. We also concur that none of the structures identified on the project are eligible for nomination to the National Register.

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

Sincerely,



Phil Boggan
State Historic Preservation Officer

PB/cm



Perennial Environmental Services, LLC
4425 Mopac South, Building II, Suite 204
Austin, TX 78735

August 18, 2016

Mr. Phil Boggan
Assistant Secretary
Louisiana Office of Cultural Development
P.O. Box 44247
Baton Rouge, LA 70804-44247

RE: Bayou Bridge Pipeline, LLC
Final Report Submission
Bayou Bridge Pipeline Project (Report No. 22-5173-1)
Addendum I
Acadia, Assumption, Calcasieu, Iberia, Iberville, Jefferson Davis, Lafayette, St. Martin, St. James, and
Vermillion Parishes, Louisiana

Dear Mr. Boggan:

On July 1, 2016, Perennial Environmental Services, LLC (Perennial) submitted the draft report: *Addendum I: A Phase I Cultural Resources Survey of the Bayou Bridge Pipeline, LLC Bayou Bridge Pipeline Project*. On July 12, 2016, Perennial received a letter from the Division of Archaeology (Division) concurring with the findings of the report. The enclosed two hard copies and one PDF copy of the report is considered the final report.

Bayou Bridge Pipeline, LLC (BBP), retained Perennial to conduct a Phase I cultural resources survey for the proposed Bayou Bridge Pipeline Project (Project). The Project consists of the construction of approximately 260.93 kilometers (km) (162.07 miles [mi]) of new 24-inch (in) diameter crude oil pipeline that will commence south of Lake Charles in Calcasieu Parish, Louisiana and will terminate near St. James in St. James Parish, Louisiana. The 260.93-km (162.07-mi) pipeline is comprised of a 259.13-km (160.95-mi) mainline and a 1.80-km (1.12-mi) lateral. The proposed Project also involves the construction of two pump stations and other ancillary facilities along the proposed pipeline. The pump stations will be located near milepost (MP) 42.5 and MP 98.9 in Jefferson Davis and St. Martin parishes, respectively.

We appreciate your assistance with this Project. As outlined in the report, a second addendum report for the Project encompassing the remaining survey areas is still forthcoming. Should you have any questions or require additional information, please do not hesitate contact me at (512) 358-0340 or by email at zoverfield@perennialenv.com.

Sincerely,

Zachary Overfield, MA, RPA
Archaeologist/Principal Investigator
Perennial Environmental Services

RECEIVED

AUG 22 2016

ARCHAEOLOGY

The Final Report has been reviewed and accepted. 22-5173-1	
	24 August 2016
Phil Boggan	Date
Deputy State Historic Preservation Officer	



BILLY NUNGESSER
LIEUTENANT GOVERNOR

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

RENNIE S. BURAS, II
DEPUTY SECRETARY

PHIL BOGGAN
ASSISTANT SECRETARY

12 July 2016

Zachary M. Overfield
Archaeologist/Principal Investigator
Perennial Environmental Services, LLC
4425 South Mopac, Building II, Suite 204
Austin, TX 78735

Re: Draft Report

La Division of Archaeology Report No. 22-5173-1

Addendum I: Phase I Cultural Resources Survey of the Bayou Bridge Pipeline, LLC, Bayou Bridge Pipeline Project, Acadia, Assumption, Calcasieu, Iberia, Iberville, Jefferson Davis, Lafayette, St. Martin, St. James, and Vermilion Parishes, Louisiana

Dear Mr. Overfield:

We acknowledge receipt of your letter dated 1 July 2016 and one copy of the above-referenced report. We have completed our review of this report and have no comments to offer.

We concur that the portion of site 16AS123 lying within the current rice field and sugar cane field is not eligible for nomination to the National Register of Historic Places and that the remainder of the site is undetermined with respect to its eligibility for nomination to the National Register. We concur that site 16AS124 is undetermined with respect to its eligibility for nomination to the National Register, and that project plans have been modified to avoid any impacts to the known site location. We also concur that the portions of sites 16SM127, 16SM128, and 16SM130 within the project area are not eligible for nomination to the National Register. Our office has no further concerns for this project within its currently proposed boundaries.

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

Sincerely,

Phil Boggan
State Historic Preservation Officer



Perennial Environmental Services, LLC
4425 Mopac South, Building II, Suite 204
Austin, TX 78735

December 1, 2016

Mr. Phil Boggan
Assistant Secretary
Louisiana Office of Cultural Development
P.O. Box 44247
Baton Rouge, LA 70804-44247

RE: Bayou Bridge Pipeline, LLC
Final Report Submission
Addendum II
Bayou Bridge Pipeline Project (Report No. 22-5173-2)
Acadia, Assumption, Calcasieu, Iberia, Iberville, Jefferson Davis, Lafayette, St. Martin, St. James, and
Vermillion Parishes, Louisiana

Dear Mr. Boggan:

On November 11, 2016, Perennial Environmental Services, LLC (Perennial) submitted the draft report: *Addendum II: A Phase I Cultural Resources Survey of the Bayou Bridge Pipeline, LLC Bayou Bridge Pipeline Project*. On November 22, 2016, Perennial received a letter from the Division of Archaeology (Division) concurring with the findings of the report. The enclosed two hard copies and one PDF copy of the report is considered the final report.

Bayou Bridge Pipeline, LLC (BBP), retained Perennial Environmental Services, LLC (Perennial) to conduct a Phase I cultural resources survey for the proposed Bayou Bridge Pipeline Project (Project). The Project consists of the construction of approximately 261.6 kilometers (km) (162.6 miles [mi]) of new 24-inch (in) diameter crude oil pipeline that will commence south of Lake Charles in Calcasieu Parish, Louisiana and will terminate near St. James in St. James Parish, Louisiana. The 261.6-km (162.6-mi) pipeline is comprised of a 259.8-km (161.4-mi) mainline and a 1.80-km (1.1-mi) lateral. The proposed Project also involves the construction of two pump stations and other ancillary facilities along the proposed pipeline. The pump stations will be located near milepost (MP) 41.2 and MP 98.9 in Jefferson Davis and St. Martin parishes, respectively.

We appreciate your assistance with this Project. Should you have any questions or require additional information, please do not hesitate contact me at (512) 358-0340 or by email at zoverfield@perennialenv.com.

Sincerely,

Zachary Overfield, MA, RPA
Archaeologist/Principal Investigator
Perennial Environmental Services

RECEIVED

DEC 05 2016

ARCHAEOLOGY

The Final Report has been reviewed and accepted. 22-5173-2	
	16 Dec 2016
Phil Boggan Deputy State Historic Preservation Officer	Date



BILLY NUNGESSER
LIEUTENANT GOVERNOR

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

RENNIE S. BURAS, II
DEPUTY SECRETARY

PHIL BOGGAN
ASSISTANT SECRETARY

22 November 2016

Zachary M. Overfield
Archaeologist/Principal Investigator
Perennial Environmental Services, LLC
4425 South Mopac, Building II, Suite 204
Austin, TX 78735

Re: Draft Report

La Division of Archaeology Report No. 22-5173-2

Addendum II: Phase I Cultural Resources Survey of the Bayou Bridge Pipeline, LLC Bayou Bridge Pipeline Project: Acadia, Assumption, Calcasieu, Iberia, Iberville, Jefferson Davis, Lafayette, St. Martin, St. James, and Vermillion Parishes, Louisiana

Dear Mr. Overfield:

We acknowledge receipt of your letter dated 11 November 2016 and two copies of the above-referenced report. We have completed our review of this report and have no comments to offer.

We concur that no historic properties will be impacted by this project. Our office has no further concerns for this project.

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

Sincerely,

A handwritten signature in blue ink that reads "Phil Boggan".

Phil Boggan
State Historic Preservation Officer



Perennial Environmental Services, LLC
4425 Mopac South, Building II, Suite 204
Austin, TX 78735

February 20, 2017

Mr. Phil Boggan
Assistant Secretary
Louisiana Office of Cultural Development
P.O. Box 44247
Baton Rouge, LA 70804-44247

RE: Bayou Bridge Pipeline, LLC
Final Report Submission
Addendum III
Bayou Bridge Pipeline Project (Report No. 22-5173-3)
Acadia, Assumption, Calcasieu, Iberia, Iberville, Jefferson Davis, Lafayette, St. Martin, St. James, and
Vermillion Parishes, Louisiana

Dear Mr. Boggan:

On February 7, 2017, Perennial Environmental Services, LLC (Perennial) submitted the draft report: *Addendum III: A Phase I Cultural Resources Survey of the Bayou Bridge Pipeline, LLC Bayou Bridge Pipeline Project*. On February 16, 2017, Perennial received a letter from the Division of Archaeology (Division) concurring with the findings of the report. The enclosed two hard copies and one PDF copy of the report is considered the final report.

Bayou Bridge Pipeline, LLC (BBP), retained Perennial Environmental Services, LLC (Perennial) to conduct a Phase I cultural resources survey for the proposed Bayou Bridge Pipeline Project (Project). The Project consists of the construction of approximately 261.6 kilometers (km) (162.6 miles [mi]) of new 24-inch (in) diameter crude oil pipeline that will commence south of Lake Charles in Calcasieu Parish, Louisiana and will terminate near St. James in St. James Parish, Louisiana. The 261.6-km (162.6-mi) pipeline is comprised of a 259.8-km (161.4-mi) mainline and a 1.80-km (1.1-mi) lateral. The proposed Project also involves the construction of two pump stations and other ancillary facilities along the proposed pipeline. The pump stations will be located near milepost (MP) 41.2 and MP 98.9 in Jefferson Davis and St. Martin parishes, respectively.

We appreciate your assistance with this Project. Should you have any questions or require additional information, please do not hesitate contact me at (512) 358-0340 or by email at zoverfield@perennialenv.com.

Sincerely,

Zachary Overfield, MA, RPA
Archaeologist/Principal Investigator
Perennial Environmental Services

RECEIVED

FEB 21 2017

ARCHAEOLOGY

The Final Report has been reviewed and accepted. 22-5173-3

6 March 2017
Date

Phil Boggan
County State Historic Preservation Officer



BILLY NUNGESSER
LIEUTENANT GOVERNOR

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

RENNIE S. BURAS, II
DEPUTY SECRETARY

PHIL BOGGAN
ASSISTANT SECRETARY

16 February 2017

Zachary M. Overfield
Archaeologist/Principal Investigator
Perennial Environmental Services, LLC
4425 South Mopac, Building II, Suite 204
Austin, TX 78735

Re: Draft Report

La Division of Archaeology Report No. 22-5173-3

Addendum III: Phase I Cultural Resources Survey of the Bayou Bridge Pipeline, LLC Bayou Bridge Pipeline Project: Acadia, Assumption, Calcasieu, Iberia, Iberville, Jefferson Davis, Lafayette, St. Martin, St. James, and Vermillion Parishes, Louisiana

Dear Mr. Overfield:

We acknowledge receipt of your letter dated 7 February 2017 and two copies of the above-referenced report. We have completed our review of this report and have no comments to offer.

We concur that no historic properties will be impacted by this project. Our office has no further concerns for this project.

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

Sincerely,

Phil Boggan
State Historic Preservation Officer