February 15, 2006

Ms. Elizabeth Wiggins  
Environmental Planning and Compliance Branch  
New Orleans District, Corps of Engineers  
P.O. Box 60267  
New Orleans, LA 70160-0267

Re: CRM Management Summary  
LA Division of Archaeology Report No. (22-3034)  
Phase I Cultural Resources Survey and Inventory  
Performed for Lake Pontchartrain and Vicinity Project,  
Individual Environmental Report Area 2 (IER#2)  
Lake Pontchartrain Hurricane Protection Levee,  
Jefferson and St. Charles Parish, Louisiana  
R. Christopher Goodwin and Associates, Inc.

Dear Ms. Wiggins:

We are in receipt of your letter of January 15, 2008, transmitting a Management Summary from R. Christopher Goodwin and Associates, Inc. for the above-cited project. This management summary meets the basic guidelines for such documents set forth by the Louisiana Division of Archaeology.

We agree with the recommendations concerning cultural resources for the project area made by R. Christopher Goodwin and Associates, Inc. that no known historic properties will be affected by the proposed undertaking.

We look forward to reviewing the full reports for this and other Individual Environmental Report Areas (IERs). Technical comments of a minor nature are enclosed and should be considered with the submission of a draft report for all the IERs. If you have any questions or comments concerning this project, please feel free to contact Dennis Jones at (225) 342-8170 or djones@crt.state.la.us
Sincerely,

Pam Breaux
State Historic Preservation Officer

PB:DJ:s

C: Mr. William Athens, R. Christopher Goodwin and Associates, Inc. (w/enclosures).

2. Page 8. Please cite the sources for the historic maps cited on this page, especially Kruse's *Map of Kenner*, when referencing the possible locations of the logging industry in this particular IER.

3. Page 9. The text notes that nine of the original 15 parcels were "assessed" for potential work staging areas and refers to Figures 3 and 4. The designations for these nine areas are unclear on these two figures. Figure 3 shows 16 "Survey Areas" and Figure 4 shows five "Staging Areas," one "Parcel" and one "Area." The various figures and individual sheets within all the figures, however, are very informative to the locations that were investigated.

4. Page 24. Figure 5 is a commendable documentation of logging activities within the project area and supports the case for a focus on that portion of the Area of Potential Effect.

5. Pages 25-31. The photographs and illustrations for the various Staging Areas are laudable for providing a record of the conditions within each of the areas investigated.
In 1982, archeologists from New World Research, Inc. conducted a cultural resources survey of the Lake Pontchartrain and Vicinity Hurricane Protection Project for the New Orleans District of the Army Corps of Engineers (New World Research 1983). This project consisted of both a terrestrial survey of the proposed project corridor, and an off-shore survey of two proposed borrow pit locations. Segment E of this proposed project corridor generally corresponded to IER2, although the configuration of the project corridor required survey of only an 11 m (36.1 ft) wide area on either side of the existing levee. The investigators reported that because of poor surface visibility on Segment E, shovel test pits were required on both sides of the levee; however, the spacing and total number of shovel tests was not reported. No cultural resources were identified within Segment E as the result of this survey.

**ASSESSMENT OF ARCHEOLOGICAL SITE POTENTIAL WITHIN IER2**

Currently, the northwestern corner of Jefferson Parish consists mainly of residential neighborhoods with mixed industrial/commercial activity in the vicinity of New Orleans International Airport. Prior to urban development it consisted of cypress swamp, very similar to the Labranche wetlands that still exist in St. Charles Parish on the west side of the St. Charles Outflow Canal. The potential for significant prehistoric archeological sites within this setting is generally very low because of frequent flooding; no archeological sites have been recorded within 1.6 km (1 mi) of the IER2 undertaking. The prehistoric sites that have been found within regional wetlands usually occur at the mouths of bayous (e.g., Sites 16SC11, 16SC12, and 16SC17) or on elevated natural levees (e.g., Site 16SC10). Some of these sites can be large, such as the Bayou Jasmine Site (16SB28) in St. John the Baptist Parish. Sites created during the historic period tend to be related to plantations that were concentrated along the Mississippi River and other major waterways. Substantial occupation of New Orleans area wetlands did not occur until after the completion of major drainage projects in the early to mid-nineteenth century.

In order to determine the potential for unrecorded historic properties within IER2, for Section 106, R. Christopher Goodwin & Associates, Inc. staff assessed the Area of Potential Effects, in relation to the results of the previous archeological surveys, the plotted positions of known cultural resources, aerial, topographic and soil maps, and visual observation of land parcels from publicly accessible streets. In conjunction, these data indicate that within (moderate) archeological potential is limited to the northernmost and eastern portions of the St. Charles Outflow Canal, where existing land disturbance was absent. This assessment is based primarily on its location near the shoreline of a major lake (potential based on excellent flood sources (both Rangia shellfish and lacustrine fish). The site files at the Louisiana Division of Archaeology show that prior to development of residential neighborhoods, several prehistoric archeological sites were located on the Lake Pontchartrain shoreline in the northeast corner of Jefferson Parish, in the vicinity of Boenental Boulevard and the 77th Street Canal. These sites included 16JE04, 16JF76, and 16JF40, which were situated within or very near the Area of Potential Effects for adjacent IER3. The records also plot Sites 16SC17, 16JF06 and 16JF39 being located in the general shoreline area. All of these sites are described in the site files as the remnants of prehistoric shell middens, including at least two sites (16JE04 and 16JF06) that once were quite substantial. With the exception of 16SC17, all of these sites have been severely impacted by modern development. Similar sites may once have occurred along the Lake Pontchartrain shoreline in additional portions of St. Charles and Jefferson Parishes, but have been obscured from view or destroyed without having been recorded.

Natural effects, such as subsidence, and modern disturbance from levee construction and residential development have greatly limited the potential for locating significant in situ cultural deposits (i.e., historic properties defined by Section 106) in the northern part of IER2. Figures 3-4 and Appendix 1 provide topographic and aerial views of the IER2 study area and show that the entirety of the Jefferson Parish side of the project corridor has been extensively impacted by residential and industrial development. The potential for locating intact archeological deposits in this area is therefore assessed as being low, although a number of land tracts that displayed little surface evidence of urban development were selected for testing this supposition (Appendix 1). On the St. Charles Parish side of the project corridor, much of the Area ofPotential Effects shows existing disturbance through dredging of the hurricane protection levee and the St.

R. Christopher Goodwin & Associates, Inc.
References Cited

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Krieger, Alex D.

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United States Department of Agriculture (USDA)

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Willey, Gordon R., and Phillip Phillips

R. Christopher Goodwin & Associates, Inc.