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Neil T. Gauthier
Project Manager
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Re: Comments: Proposed Transmission Line in St. Charles, St. John the Baptist, and St. James Parishes, May Pose a Danger to Burials for People of African Descent

#MVN 2019-00376-CM

Dear Mr. Gauthier:

On behalf of RISE St. James we submit these comments to urge you to deny the permit sought by Entergy for construction of a transmission line to supply electricity to FG LA (also known as “Formosa Plastics”) as it does not appear a full and thorough consultation pursuant to Sec. 106 of the National Historic Preservation Act has been undertaken in connection with this permit application.

We are concerned that the permit notice states that the “[t]he possibility exists that the proposed work may damage or destroy presently unknown archeological, scientific, prehistorical, historical sites, or data.” In fact, there is ample reason to be concerned that proposed work could damage or destroy cemeteries along the route of the project area, some of which could be eligible for listing on the National Register of Historic Places. Construction and ground disturbances on this site may endanger cemeteries, including some likely containing the graves of people once enslaved on plantations that operated in the project area.

The area that the transmission line would traverse along the Mississippi River was once home to a number of plantations. We take this opportunity to draw your attention to this [report](#) which was prepared by an archaeological expert documenting their comprehensive and detailed assessment that as many as six cemeteries may exist on just the Formosa site alone.¹ The area in which Formosa Plastics

¹ Coastal Environments, Inc., Cartographic Regression Analysis of Certain Tracts of Land Located in T. 11 S. and 12 S., R. 15 E. (Southeastern Land District West of the Mississippi River), St. James Parish, Louisiana, February 2020, at pp. 35-36, available at <https://ccrjustice.org/sites/default/files/attach/2020/03/St.%20James%20Cemeteries%20%28Reduced%29%20%281%29.pdf>. Because this report is a large file, we are including it as a link rather than an attachment. We are happy to provide a hard copy upon request.

seeks to build was once home to three different plantations on which hundreds of people were enslaved, and who had no choice but to be buried on that property. As described in the expert report, one cemetery has been confirmed already and searches for a second cemetery have so far not been conducted in the area mostly likely to contain intact graves. As for the other four potential cemeteries, to date there has been no confirmation from Formosa Plastics as to whether it has searched or will search for graves.

A set of detailed maps from 1877 and 1878 of this area have recently become available and show the location of cemeteries. These maps offer the ability to affirmatively search for and locate such sites before construction is allowed to begin, and thereby avoid inadvertent discovery that would more likely than not cause damage to such sites or even destruction. Indeed, the Buena Vista Plantation cemetery on the Formosa site already has a pipeline running through it.² Using cartographic regression, i.e. overlaying modern aerial imagery over known, fixed points on the maps, archaeologists are now more able to accurately identify and locate such sites.

Given that burial sites of people enslaved on the plantations were once thought lost to history, the discovery of such sites is enormously significant and meaningful for descendants. All cemeteries are considered sacrosanct; they become all the more sacred and meaningful when there was once no hope of finding them. Now that there is a way to proactively identify such sites in the region covered by the maps, as described in the attached report, it is incumbent upon those involved in 106 consultations to incorporate this methodology into the process.

Among the criteria for inclusion on the National Register of Historic Places – the federal government’s official list of sites deemed worthy of preservation – are 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.”³ Burial sites of people enslaved on plantations are certainly associated with “events that have made a significant contribution to the broad patterns of our history” in this country, and the “lives of persons significant in our past,” and would likely yield information important for understanding our shared history.

Thank you for your attention to this important matter.

Sincerely,



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² *Id.* at 87.

³ <https://nationalregisterofhistoricplaces.com/faq.html>