

January 12, 2007

Mr. Phillip Hollis
Project Manager
U.S. Army Corp of Engineers, Vicksburg District
Planning and Project Management Branch
4155 E. Clay Street
Vicksburg, Mississippi 39183

RE: Phase I Cultural Resources Survey of the proposed LeFleur Lakes project in
Hinds, Madison and Rankin Counties

Dear Mr. Hollis:

We have reviewed the May, 2006, cultural resources survey draft report by Archaeology Mississippi, Inc. for the above referenced undertaking, pursuant to our responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR Part 800. After review, we have the following comments and recommendations:

Madison County

* 22Md768 is an early site which has very deeply buried deposits. It is potentially eligible for the National Register of Historic Places and should be subjected to Phase II testing to determine it's eligibility and then either avoided or, if it is to be impacted, heavily excavated.

* 22Md769 is a site with three (3) conical mounds. This site is eligible for the National Register. Phase II testing should be carried out to better delineate site boundaries and recover more information about the site. There is a very high potential for the discovery of buried human remains on this site. Consultation with the relevant Mississippi tribes should be carried out prior to any impacts and NAGPRA representatives for the tribes should be consulted prior to excavations to determine how remains discovered during excavations are to be handled.

Hinds County

* 22Hi672 is the City Mound Site. It is already listed on the National Register and should be avoided. If it cannot be avoided, then mitigation/full salvage excavation should be conducted after consultation with the relevant Mississippi Native American Tribes.

Rankin County

* 22Ra502 is the Flowood Mound Site. This site is eligible for listing on the National Register. It should be avoided. If it cannot be avoided, then mitigation/full salvage

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excavation should be conducted after consultation with the relevant Mississippi Native American Tribes.

* 22Ra692 is a deeply buried, very early prehistoric site. We concur with the authors of the report that this may be one of the most significant sites discovered in this survey. We recommend Phase II testing to better delineate the site's boundaries and to gather more information. Avoidance of the site would be preferred, but if it is to be impacted, then full scale salvage excavations need to be conducted.

* 22Ra700 is a previously-unidentified mound site. Phase II testing should be conducted to better delineate site boundaries and recover more information about the site. There is a very high potential for the discovery of buried human remains on this site. Consultation with the relevant Mississippi tribes should be carried out prior to any impacts and NAGPRA representatives for the tribes should be consulted prior to excavations to determine how remains discovered during excavations are to be handled.

Prehistoric sites requiring Phase II testing to determine National Register eligibility:

<i>Madison County</i>	22Md772 22Md773 22Md774
<i>Hinds County</i>	22Hi819 22Hi820 22Hi823
<i>Rankin County</i>	22Ra675 22Ra681 22Ra689 22Ra693 22Ra695/696 (adjoining sites) 22Ra698

Historic Site for which Phase II testing is recommended:

* 22Ra671 is the City Landing or Ferry Bridge Site. This is an important historic site relevant to the history of the area. We concur with the author's recommendation that the area be subjected to backhoe trenching to discover features that should then be hand-excavated.

We also concur with the recommendations of the author(s) that areas previously surveyed in 1993 (MDAH #93-024 "Cultural Resource Survey and Testing on the Pearl River in the Jackson Metro Area" by James Lauro) should be resurveyed, as the survey

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methodology used does not meet the minimum standards for archaeological survey for the State of Mississippi, as indicated on page 235 of the report. One of these previously-surveyed areas revealed eleven previously-unidentified sites, one of them being a mound. This alone should merit resurvey of these areas. One portion of the 1993 survey located in Rankin County was resurveyed in 2001 (MDAH #01-127 "Cultural Resource Survey of Two Proposed Borrow Areas" by James Lauro). A revisit during this 2005/2006 survey discovered a previously-unidentified archaeological site (22Ra672) in this area. The site was determined to be ineligible for listing in the National Register of Historic Places, due to the severe impact by a borrow pit.

The report indicates that certain areas were inaccessible to the survey crew due to the lack of landowner permission. We concur with the report's recommendations that these areas should be surveyed for archaeological sites when landowner permission to enter these properties is obtained. We also recommend that any areas to be included in the project area that have not been surveyed for archaeological sites be surveyed prior to any ground disturbance/inundation.

We also concur with the report's recommendations (on page 628) that deep testing, either through trenching or soil coring, should be conducted at locations identified by the geologist and archaeologists. Soil coring to obtain pollen samples and dendochronology samples from submerged stumps should also be conducted as recommended by the report. If this area is to be permanently inundated, then this is would be the last chance to gather these samples.

If you need further information, please let us know.

Sincerely,

Jim Woodrick
Review and Compliance Officer

FOR: H.T. Holmes
State Historic Preservation Officer