



**Illinois Historic
Preservation Agency**

1 Old State Capitol Plaza • Springfield, Illinois 62701-1507 • Teletypewriter Only (217) 524-7128

PLEASE REFER TO: IHPA LOG #009030705

DeWitt County
Clinton
Clinton Lake

NRC
Draft EIS, Exelon ESP Site

April 11, 2005

Pao-Tsin Kuo
United States Nuclear Regulatory Commission
License Renewal and Environmental Impacts Programs
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation
Washington, DC 20555-0001

Dear Mr. Kuo:

Thank you for requesting comments from our office concerning the possible effects of the project referenced above on cultural resources. Our comments are required by Section 106 of the National Historic Preservation Act of 1966 (16 USC 470), as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties".

The project area has not been surveyed and may contain prehistoric/historic archaeological resources. Accordingly, a Phase I archaeological reconnaissance survey to locate, identify, and record all archaeological resources within the project area will be required. This decision is based upon our understanding that there has not been any large scale disturbance of the ground surface (excluding agricultural activities) such as major construction activity within the project area which would have destroyed existing cultural resources prior to your project. If the area has been heavily disturbed prior to your project, please contact our office with the appropriate written and/or photographic evidence.

The area(s) that need(s) to be surveyed include(s) all area(s) that will be developed as a result of the issuance of the federal agency permit(s) or the granting of the federal grants, funds, or loan guarantees that have prompted this review.

Enclosed you will find an attachment briefly describing Phase I surveys and a list of archaeological contracting services. THE IHPA LOG NUMBER OR A COPY OF THIS LETTER SHOULD BE PROVIDED TO THE SELECTED PROFESSIONAL ARCHAEOLOGICAL CONTRACTOR TO ENSURE THAT THE SURVEY RESULTS ARE CONNECTED TO YOUR PROJECT PAPERWORK.

If you have questions, please contact David J. Halpin, Staff Archaeologist, at 217-785-4998.

Sincerely,

Anne E. Haaker

Anne E. Haaker
Deputy State Historic
Preservation Officer

AEH:DJH

Enclosure: Archaeological Contractors List

*Revised
5/14/05*

3/10/05
10 FR 12022

18

SESP Review Complete
template = ADM-013

E-EIS = ADM-03

Call = T. Kenyon (TSK2)



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PROTECTING ILLINOIS' CULTURAL RESOURCES An Introduction to Archaeological Surveys

Prepared by
ILLINOIS STATE HISTORIC PRESERVATION OFFICE

When you read the accompanying letter, you were notified that your Federal or State permitted, funded, or licensed project will require an archaeological survey. We also review projects that use public land. The purpose of this survey will be to determine if prehistoric or historic resources are present within the project area. If you are the average applicant you have had little or no experience with such surveys – this short introduction is designed to help you fulfill the Federal/State requirements and complete the process.

WHY PROTECT HISTORIC RESOURCES? Historic preservation legislation grew out of the public concern for the rapid loss of our prehistoric and historic heritage in the wake of increasingly large-scale Federal/State and private development. The legislation is an attempt to protect our heritage while at the same time allowing economic development to go forward.

WHAT IS THE LEGAL BASIS? The basis for all subsequent historic preservation legislation lies within the national Historic Preservation Act of 1966 (NHPA). Section 106 of NHPA requires all Federal Agencies "undertakings" to "take into account" their effect on historic properties. As of January 1, 1990, the State Agency Historic Resources Preservation Act (Public Act 86-707) requires the same for all private or public undertakings involving state agencies. An "undertaking" is defined to cover a wide range of Federal or State permitting, funding, and licensing activities. It is the responsibility of Federal/State Agencies to ensure the protection of historic resources and the State Historic Preservation Office (SHPO) regulates this effort. In Illinois the SHPO is part of the Illinois Historic Preservation Agency (IHPA).

WHAT IS AN ARCHAEOLOGICAL SURVEY? An archaeological survey includes both (1) an examination of the written records, such as county plat books, published and unpublished archaeological reports, state site files, and (2) a field investigation of the project area to determine if prehistoric or historic resources are present. This process of resource identification is called a Phase I survey.

WHAT DOES A PHASE I SURVEY REQUIRE? Archaeological evidence is normally buried beneath the surface of the ground. To determine if an archaeological site is present it is necessary to get below this surface. The most efficient way is by plowing. If the project area is or can be plowed then the artifactual evidence will be brought to the surface and systematic pedestrian surveys (walkovers) will determine if a site is present. These walkovers are best done when the vegetation is low in the fall or spring. If the project area is covered with vegetation then small shovel probes (1' sq.) are excavated on a systematic grid pattern (usually 50' intervals) to sample the subsurface deposits. Where deeply buried sites may be present, such as in floodplains, deep coring or machine trenching may be required.

WHO DOES ARCHAEOLOGICAL SURVEYS? Professional archaeologists who meet the Federal standards set forth in the Secretary of the Interior's Professional Qualifications Standards (48 FR 44738-9) may conduct Federal surveys, while those meeting the State standards set forth in the Archaeological and Paleontological Resources Protection Act (20 ILCS 3435) may conduct surveys on public land in the State (see the other side of this sheet for information on obtaining the services of a contract archaeologist). The applicant is responsible for obtaining and paying for such services.

AFTER THE SURVEY – WHAT NEXT? When the field investigations are completed the archaeologist will submit a report of their findings and recommendations to the applicant. **IT IS THE RESPONSIBILITY OF THE APPLICANT TO FORWARD TWO (2) COPIES TO THE SHPO FOR EVALUATION AND FINDINGS.** If no sites were found or the sites found are not eligible for the National Register the project may proceed. Occasionally, a significant archaeological site may be encountered. In such a case the SHPO and the Federal or State Agency will work with the applicant to protect both the cultural resources and to facilitate the completion of your project.

NEED FURTHER ASSISTANCE? The IHPA is here to assist you and the Federal/State agencies in complying with the mandates of the historic preservation legislation. If you have questions or need assistance with archaeological resources protection or Federal/State compliance, please contact the Archaeology Section, Preservation Services Division, Illinois Historic Preservation Agency, 500 East Madison Street, Springfield, Illinois 62701 (217/785-4512).

OVER



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Illinois Historic Preservation Agency – Archaeology Section

Information for Developers and Agencies about general procedures for Phase 2 archaeology projects

Anyone notified of an archaeological site subject to Phase 2 testing in their project area, has several options:

1. Preserve the site by planning your project to avoid or greenspace the site, a deed covenant maybe necessary depending on the land ownership and the law the project is being reviewed under.
2. Hire an archaeological firm to conduct a Phase 2 project on the site.
3. Choose a different location for the project (generally means starting review process over from scratch, but there will be rare occasions when this is actually the fastest and cheapest option). This is something you may wish to consider if there are burials in the project area, or an extremely large or dense site in the project area.

Phase 2 archaeological projects consist of fieldwork, analysis, and report by the archaeological firm, and then review of the report by the IHPA and sometimes also by the funding or permitting agency, with additional work required part of time depending on the significance of the site(s). However, if a project has no significant sites after a Phase 2 project has been completed and reviewed, then the archaeology is completed as soon as IHPA accepts the report. If a project area has more than 1 site, each one is reviewed independently, in other words, one could be determined not significant and while another one is determined significant or potentially significant.

Phase 2 field work generally consists of obtaining good artifact type and location data from the site surface by methods such as grid collections, piece plotting, etc., this is followed by a small scale excavation. In some cases the fieldwork (commonly called test units) can be done with assistance of machines like backhoes or occasionally even large equipment like belly scrapers (plowed or partially disturbed sites), but sometimes it is necessary to dig by hand (mounds, unplowed sites; or inaccessible locations). The test units are excavated to the base of the plowzone or topsoil, and then the base of the unit is checked for presence of archaeological features (foundations, pits, hearths, burials, middens, etc.) If features are present, a small number (generally not more than 5-10) of them are excavated to provide information about the site's age, function, integrity, etc. Samples of soil from each feature for botanical and zoological analysis are usually taken. Also on floodplains of large rivers, several additional "deep" trenches are usually necessary to check for buried sites. The amount of time required for fieldwork is highly dependent on the size of a site, on whether machines can be used, and on the density of features, as well as the weather.

Analysis at Phase 2 consists of identifying and inventorying all of the artifacts recovered and preparing data recorded in the field for a report. The length of time needed is again highly variable based on the factors listed above. The report describes the field and lab information, provides a preliminary interpretation of the site, and makes recommendations concerning the significance of the site.

The archaeology staff at the State Historic Preservation Office (IHPA in Illinois) and sometimes the archaeologists at the lead funding or permitting agency review the report. Based on the report and their knowledge of regional archaeological, they determine (following criteria outlined in the appropriate law and regulations for each project) if the work done was acceptable, and whether the site(s) are not significant and need no further investigation or are significant. If a site is significant (meets the eligibility criteria for the National Register of Historic Places), the choices are mitigation (generally by complete excavation) or preservation.

Joseph S. Phillippe, Chief Archaeologist (1-1-2005)

ILLINOIS-BASED CONSULTING SERVICES WITH PROFESSIONAL ARCHAEOLOGISTS (by zip code order, 2/15/2005 update)
In order to assist agencies, engineering firms, and others who require professional archaeological services the Illinois Historic Preservation Agency (IHPA) has listed below Illinois-based firms with professional archaeologists currently performing contract archaeological compliance work. Based on documentation supplied by them these individuals appear to meet current Federal qualifications. This list is provided for your assistance, however, you may use any archaeologist who meets the minimum qualifications as set forth in Secretary of the Interior's Professional Qualifications Standards (36 CFR 61). Federal and state regulations require a completed graduate degree with an emphasis in archaeology and 16 months of professional archaeological experience (**BOLD** names below). If you have any questions please contact IHPA at 217/785-4512. **THE INCLUSION OF INDIVIDUALS OR ORGANIZATIONS ON THIS LIST DOES NOT CONSTITUTE ANY RECOMMENDATION OR ENDORSEMENT OF THEIR PROFESSIONAL EXPERTISE OR PERFORMANCE RECORD BY THE IHPA.**

CHICAGO METRO REGION

Contact Dr. Kevin P. McGowan
Public Service Archaeology Prgm
Chicagoland Office (UI-UC)
Post Office Box 7085
Grayslake, Illinois 60030
847-548-7961 (fax same)

Ms. Lynn M. Gierek
ENSR International
27755 Diehl Road
Warrenville, Illinois 60555-3998
630-839-5332 / 836-1711 (fax)
lgierek@ensr.com

Mr. Stephen Parrish
Archaeological Research, Inc.
1005 Greta Avenue
Woodstock, Illinois 60098
815-334-8077 / 0530 (fax)

Contact Dr. Mark W. Mehrer
Northern Illinois University
Contract Archaeology Program
Department of Anthropology
102 Stevens Building
DeKalb, Illinois 60115
815-753-7544 / 7027 (fax)
mmehrer@niu.edu

Contact Dr. Rochelle Lurie
Dr. M. Catherine Bird
Midwestern Archaeological
Research Services, Inc.
505 North State Street
Marengo, Illinois 60152
815-568-0680 / 0681 (fax)

Dr. Cynthia L. Balek
Archaeology & Geomorphology Services
2220 Mayfair Avenue
Westchester, Illinois 60154
708-531-1445 / 562-7314 (fax)
cbalek@msn.com

Mr. Douglas Kullen
Allied Archeology
239 South Calumet Avenue
Aurora, Illinois 60506
630-896-9375 / 897-9682 (fax)
archon2001@hotmail.com

CHICAGO METRO REGION CON'T

Contact Mr. Jeff Schuh
Patrick Engineering, Inc.
4970 Varsity Drive
Lisle, Illinois 60532
630/795-7200 / 434-8400 (fax)

Contact Mr. David Keene
Archaeological Research, Inc.
1735 North Paulina Street, Suite 113
Chicago, Illinois 60622
773-384-8134 / 8286 (fax)

NORTHERN REGION

Contact Dr. Thomas E. Berres
OurHeritage Archaeological Svcs, Inc.
983 Quail Run
DeKalb, Illinois 60115-6117
815-754-9611

Contact Ms. K. Shane Vanderford
ITARP Northern Illinois Survey Division
6810 Forest Hills Road
Loves Park, Illinois 61111
815-282-0762 / 0754 (fax)

CENTRAL REGION

Mr. Keith L. Barr
Archaeological & Architectural Surveys
Old Inn Farm
Rural Route 1
Fairview, Illinois 61432
309-778-2536

Mr. Lawrence A. Conrad
Western Illinois University
Archaeology Lab
201 Tillman Hall
Macomb, Illinois 61455
309-298-1188

CENTRAL REGION CON'T

Dr. Michael D. Wiant
Dickson Mounds Museum
10956 North Dickson Mounds Road
Lewistown, Illinois 61542
309-547-3721

Dr. Brian Adams
Public Service Archaeology Program
716 North Ashland Avenue
West Peoria, Illinois 61604
309-671-0876 (fax same)

Dr. Charles L. Rohrbaugh
Archaeological Consultants
320 Robert Drive
Normal, Illinois 61761
309-454-6590

Contact Dr. Paul P. Kreisa
University of Illinois
Anthropology Department
Public Service Archaeology Program
109 Davenport Hall
607 South Matthews Avenue
Urbana, Illinois 61801
217-333-1636 / 217-244-1911 (fax)

Contact Mr. Dale McElrath
University of Illinois Champaign-Urbana
UIUC-ITARP Statewide Office
23 East Stadium Drive
209 Nuclear Physics Lab (MC-571)
Champaign, Illinois 61820
217-333-0667 / 244-7458 (fax)

Dr. Fred A. Finney
Upper Midwest Archaeology
Post Office Box 106
St. Joseph, Illinois 61873-0106
217-469-0106 (voice/fax same)
cell 217-778-0348
FAFinney@aol.com

Dr. William E. Whittaker
118 Paddock Drive
Savoy, Illinois 61874
217-840-6245
wewhittaker@hotmail.com

More Central Listings – Over

CENTRAL REGION CON'T

Ms. Gail Anderson
Center for American Archeology
(Kampsville Archeological Center)
Post Office Box 22
Kampsville, Illinois 62053
618-653-4316 / 4232 (fax)

Contact Mr. David J. Nolan
ITARP Western Illinois Survey Division
604 East Vandalia
Jacksonville, Illinois 62650
217-243-9491 / 7991 (fax)
Macomb Lab
309-833-3097
Springfield Lab
217-522-4295 / 4395 (fax)

Contact Dr. Michael Sheehay
Illinois State Museum Society
1011 East Ash Street
Springfield, Illinois 62703
217-785-0037 / 2857 (fax)

Mr. Floyd Mansberger
Fever River Research
Post Office Box 5234
Springfield, Illinois 62705
217-525-9002 / 6093 (fax)

Mr. Joseph Craig
Environmental Compliance Consultants
Post Office Box 5603
Springfield, Illinois 62705-5603
217-544-4881 / 4988 (fax)
jcraig@eccinc.org

METRO EAST REGION

Contact Mr. Joseph L. Harl
Archaeological Research Center
Of St. Louis (Illinois Office)
313 Filmore Street
Post Office Box 444
Worden, Illinois 62097-0444
314-426-2577 / 2599 (fax)
or 800-340-4CRM

Contact Dr. Charles W. Markman
Markman & Associates, Inc.
4618 North Illinois, Suite 178
Fairview Heights, Illinois 62208
314-862-6117 / 6712 (fax)
charlie@markmaninc.com

METRO EAST REGION CON'T

Contact Dr. Steve Dasovich
SCI Engineering, Inc.
15 Executive Drive
Fairview Heights, Illinois 62208
636-949-8200 / 8269 (fax)

Contact Mr. Brad Koldehoff
UIUC - ITARP
American Bottom Survey Division
6608 West Main Street
Belleville, Illinois 62223
618-397-5096 / 5097 (fax)

Dr. John Kelly
Central Mississippi Valley
Archaeological Research Institute
Post Office Box 413
Columbia, Illinois 62236
618-281-8205

SOUTHERN REGION

Contact Mr. Michael J. McNerney
Mr. Steve Titus
American Resources Group, Ltd.
127 North Washington Street
Carbondale, Illinois 62901
618-529-2741 / 457-5070 (fax)

Contact Dr. Brian M. Butler
Southern Illinois University
Center for Archaeological Investigations
Mail Code 4527
Carbondale, Illinois 62901
618-453-5031 / 8467 (fax)