



Maryland Department of Planning  
Maryland Historical Trust

Martin O'Malley  
Governor  
Anthony G. Brown  
Lt. Governor

Richard Eberhart Hall  
Secretary  
Matthew J. Power  
Deputy Secretary

August 15, 2011

Woody Francis  
Regulatory Branch  
Baltimore District  
U.S. Army Corps of Engineers  
P.O. Box 1715  
Baltimore, MD 21203-1715

Re: *Review of Submerged Cultural Resources Survey, Calvert Cliffs Unit 3 (CC3), Calvert Cliffs Nuclear Power Plant Site, Calvert County, Maryland*

Dear Mr. Francis:

In response to a request from UniStar Nuclear Energy, the Maryland Historical Trust (MHT) is reviewing modified and additional locations of certain structures and components related to the Calvert Cliffs Nuclear Power Plant Unit 3 (CC3) project to assess potential effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and the Maryland Historical Trust Act, State Finance and Procurement Article §§ 5A-325 and 5A-326 of the Annotated Code of Maryland. In a letter dated 29 November 2010 we recommended that a Phase I archeological survey (Identification) is conducted that both covers the area of the proposed Barge Unloading Facility that has not been surveyed and ascertains the sources of magnetic anomalies M03, M04, M05 and M06.

On 15 June 2011, we received a draft report titled, *Submerged Cultural Resources Survey, Calvert Cliffs Unit 3 (CC3), Calvert Cliffs Nuclear Power Plant Site, Calvert County, Maryland*. Our recommendations are outlined below. Specific editorial comments are attached.

**Recommendations**

Additional data should be provided that satisfactorily show that M06 and M101 are not cultural resources or specific avoidance protocols for those targets should be designed and implemented in consultation with Troy J. Nowak, Assistant State Underwater Archaeologist and Susan Langley, State Underwater Archaeologist.

However, it is possible that our concerns related to Targets M06 and M101 will be resolved by the inclusion of additional illustrations and descriptions of the work under consideration here. Specific comments on the report are attached. Those comments should be addressed and the report should be re-submitted to the Maryland Historical Trust for final review.

If you have questions or require further assistance, please contact me at [tnowak@mdp.state.md.us](mailto:tnowak@mdp.state.md.us) or (410) 514-7668, or Dr. Susan Langley at [slanglev@mdp.state.md.us](mailto:slanglev@mdp.state.md.us) or (410) 514-7662. Thank you for providing us this opportunity to comment.

Sincerely,

Troy J. Nowak  
Assistant State Underwater Archaeologist  
Maryland Historical Trust

- cc: Greg Gibson (UniStar)
- Yvonne F. Abernethy (Constellation Energy)
- Susan Langley (State Underwater Archaeologist, MHT)
- Dimitri Lutchenkov (Unistar)
- Laura Quinn (NRC)
- Kristi Uunila (Calvert County)

The following comments and corrections will need to be addressed before we can complete our review and accept the report as final.

1. All data should be presented in Maryland State Plane, NAD83, meters. This should be noted in the report and marked on all tables, maps and images, as appropriate.
2. Web pages and other electronic documents should be treated as published data and cited and referenced accordingly. Please refer to the *Society for American Archaeology Style Guide*.
3. Personal communication citations should include the full name. Please refer to the *Society for American Archaeology Style Guide*.
4. Tables should be provided that include all the magnetic anomalies under consideration in the present report, including M03-M06 and M101-M103. Those tables should minimally provide the following information:

| Anomaly | Line | X | Y | Sensor Height (m) | Amplitude (peak-to-peak [nT or $\psi$ ]) | Duration (m) | Signature | Associated Anomalies | Identification | Avoidance |
|---------|------|---|---|-------------------|--|--------------|-----------|----------------------|----------------|-----------|
|---------|------|---|---|-------------------|--|--------------|-----------|----------------------|----------------|-----------|

5. High resolution side scan sonar images should be provided for the area where each magnetometer target was located and for each anthropogenic side scan sonar contact. These should be clipped from the original line data, not from side scan sonar mosaics. The use of low resolution images or those clipped from side scan sonar mosaics, such as Figure 26, is not acceptable.
6. Target specific comments:

**M03:**

Please provide two illustrations for this target. One should include an overlay of 2008 high resolution side scan sonar data, 2008 magnetic contours, and a post-plot of relevant 2008 magnetometer tracklines. The other should include an overlay of 2011 high resolution side scan sonar data, 2011 magnetic contours, and a post-plot of relevant 2011 magnetometer tracklines. Both graphics also should show the location of the pipe, both the 2008 and 2011 magnetic anomalies designated M03, a graphic scale, and a north arrow. The graphics should be produced at a readable scale.

**M04:**

Please provide illustrations similar to those outlined under Target M03 above.

**M05:**

Please provide a high resolution side scan sonar image of M05 with a graphic scale.

**M06 and M101:**

Please provide similar illustrations similar to those outlined under Target M03 above with the addition of positive and negative probe locations and the penetration depth of each probe.