



HPO- J2009-033
Log #09-0740-3 VM

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

NATURAL & HISTORIC RESOURCES, HISTORIC PRESERVATION OFFICE

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Acting Commissioner

October 6, 2009

**Nuclear Development
Received**

OCT 09 2009

Mr. Jeffrey J. Pantazes
PSE&G Power LLC
Nuclear Development
244 Chestnut Street
Salem, New Jersey 08079

Dear Mr. Pantazes:

As Deputy State Historic Preservation Officer for New Jersey, in accordance with 36 CFR Part 800: Protection of Historic Properties, as published with amendments in the Federal Register on 6 July 2004 (69 FR 40544-40555), I am providing **Consultation Comments** for the following undertaking:

Salem County, Lower Alloways Creek Township
Phase I Archaeological Survey Report
Money Island Rd and Alloway Creek Neck Rd Access Alt.
Early Site Permit Application
Hope Creek/Salem Nuclear Power Station
Federal Energy Regulatory Commission

800.4 Identifying Historic Properties

These consultation comments are in response to the following submitted cultural resource reports received at the Historic Preservation Office (HPO) on August 6, 2009:

Brown, J. Emmett
July 31, 2009

Report of Phase I Archaeological survey for Selected Portions of Two Access Road Alternatives, PSEG Early Site Permit Applications, Salem, New Jersey. Prepared for PSEG Power, LLC. Prepared by MACTEC Engineering and Consulting, Inc., Knoxville, TN.

The HPO has reviewed the above-cited archaeological report (the Report) and determined it to be technically incomplete for the identification and evaluation of historic properties within the undertaking's area of potential effects (APE) pursuant to 36 CFR § 800.4. Specifically, the report lacks the inclusion of historic period maps, such as the 1830s-40s coastal survey maps, for

the identification of resources within the Money Island Road Access Alternative and Alloway Creek Neck Road Access Alternative areas of potential effects. The coastal survey maps are available at:

<http://alabamamaps.ua.edu/historicalmaps/Coastal%20Survey%20Maps/new%20jersey.htm>.

Therefore, not all potential archaeological resources were identified within the undertaking's APE. In consequence, it not possible to determine whether the archaeological methods employed were adequate to identify all archaeological deposits within both areas of potential effects.

The Report states no archaeological sites were identified within Alloway Creek Neck Road Access Alternative APE. The HPO *disagrees* with this assessment based on the lack of supporting historic period map research discussed above. The location(s) of former historic structures for both project sites needs to be adequately tested to identify the presence or absence of archaeological deposits. In addition, if portions of either APE are not field walked but subjected to a program of shovel testing, all isolated find spots positive for Native American and/or pre-20th century historic period artifacts shall be investigated with 10-foot radial shovel tests to confirm if the location(s) is indeed an isolated find spot or part of an archaeological site.

All artifact locations identified during pedestrian survey of agricultural fields should be identified on project maps. The individual artifact finds (IF) and artifact clusters (Cluster) were provided for the Alloway Creek Neck Road Access Alternative (Appendix B) but not for the Money Island Road Access Alternative (Appendix A). This information is necessary to document the limits of archaeological sites. Please include the locations of all artifact find spots identified through surface collection and/or a discussion of how archaeological site limits were determined in the revised report.

All archaeological reports submitted to the HPO must contain a shovel test log for archaeological test locations. Please include a shovel test log appendix for all shovel tests in the revised report. Finally, all reports submitted to the HPO shall be accompanied by a report copy in PDF format on a CD attached to the inside rear report cover.

While the Report is determined inadequate for the identification of all archaeological properties within the area of potential effects (APE) for the two proposed road alternatives, sufficient information is available to provide the following comments and keep the project moving forward. The Report identified archaeological sites 28SA179, 28SA180, 28SA181, 28SA182, and 28SA183 within the proposed Money Island Road Access Alternative alignment APE. All five of the above-referenced archaeological sites were identified as multi-component sites containing both Woodland period Native American and mid-eighteenth- through nineteenth century historic period archaeological deposits. In consequence, Phase II archaeological survey is necessary within the Money Island Road access alternative alignment APE for the above-referenced archaeological sites to evaluate their National Register eligibility and provide assessment of project impacts as needed. Please be aware, additional archaeological sites requiring Phase II survey may be identified by the Phase I survey.

Please be aware, during Phase II archaeological investigations, for properties on or eligible for National Register inclusion, recommendations must be provided for avoidance of

impacts. If impacts cannot be avoided, analyses must be provided exploring alternatives to minimize and/or mitigate impacts. Means to avoid, minimize and/or mitigate impacts to National Register eligible properties will need to be developed and undertaken prior to project implementation.


All phases of the archaeological survey and reporting will need to be in keeping with the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation*, and the HPO's *Guidelines for Phase I Archaeological Investigations: Identification of Archaeological Resources* and *Guidelines for Preparing Cultural Resources Management Archaeological Reports Submitted to the Historic Preservation Office*. These guidelines can be obtained through the HPO's web page (<http://www.nj.gov/dep/hpo/identify/survarkeo.htm>). Reasoning and documentation for areas excluded from testing must be included in the technical report. Evaluations to determine the National Register eligibility of archaeological sites must be in keeping with the National Park Service's 2000 National Register Bulletin, *Guidelines for Evaluating and Registering Archeological Properties*. The individual(s) conducting the work will need to meet the relevant Secretary of the Interior's Professional Qualifications Standards for archaeological survey (48 FR 44738-9).

If potential human burials or human skeletal remains are encountered, all ground disturbing activities in the vicinity shall cease immediately and the Historic Preservation Office should be contacted, as well as any appropriate legal officials. The potential burials shall be left in place unless imminently threatened by human or natural displacement.

Additional Comments

Once a revised report addressing the above-cited deficiencies has been received, the HPO will be able to provide Consultation Comments under Section 106 of the National Historic Preservation Act (as amended). If you have any questions, please do not hesitate to contact Vincent Maresca of my staff at (609) 633-2395 or vincent.maresca@dep.state.nj.us.

Sincerely,



Daniel D. Saunders
Deputy State Historic Preservation Officer

c. Emmitt Brown, MACTEC Engineering and Consulting