

**SEMINOLE TRIBE OF FLORIDA
TRIBAL HISTORIC PRESERVATION OFFICE
AH-TAH-THI-KI MUSEUM**

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SEMINOLE TRIBE OF FLORIDA
AH-TAH-THI-KI
M U S E U M
A PLACE TO LEARN. A PLACE TO REMEMBER.

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August 2, 2016

Mr. Jacob Hemingway, Archaeologist
Regulatory Division, U.S. Army Corps of Engineers, Jacksonville District
701 San Marco Blvd.
Jacksonville, FL 32207
Phone: (904) 232-3270
Email: m.okai@trileaf.com

Subject: Proposed Turkey Point Cultural Resources Assessment Survey Work Plan.
THPO #: 0006365

Dear Mr. Hemingway:

Thank you for contacting the Seminole Tribe of Florida – Tribal Historic Preservation Office (STOF-THPO) regarding the Cultural Resource Assessment Survey Work Plan for the Turkey Point facilities. The proposed undertaking does fall within the STOF Area of Interest. I have reviewed the documents the Corps of Engineers provided and would respectfully like to make the following comments and recommendations. Specifically, these comments address Sections 2, 3, and 4 of the Proposed Work Plan (pp 45 - 46).

2. The THPO concurs with the recommendation that an Unanticipated Finds plan be developed prior to construction and that this plan address the possible discovery of human remains or archaeological material. Likewise we agree that construction personnel, inspectors, managers, etc., should receive training.

3 c) Unless assurances can be made that pre-existing unimproved dirt roads will not be subjected to any ground disturbance during construction, and this includes the exclusion of the roads from construction equipment/heavy vehicle use, the THPO recommends that the pre-existing dirt roads be subjected to some sort of field survey, at a minimum a pedestrian examination of exposed surfaces. Dirt roads can be vulnerable to severe impacts from vehicle traffic especially during rain events. Since most dirt roads were not subjected to Cultural Resource Assessment Surveys before they were established, a walkover survey seems appropriate.

3 e) The THPO believes that a standard archaeological survey should be conducted for new roads or areas of road widening if the road is located within either an area of high *or* moderate archaeological probability. The Florida Division of Historical Resources Module Three does not say anything about exempting moderate probability zones from survey.

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4 b) The STOF THPO would like the opportunity to review and comment on the "detailed research plan" that will be derived from a proposed "visual survey of the APE". We understand that this refers to the Archaeological Survey and Identification Plan for the Transmission Line Corridors, the Reclaimed Water Delivery Pipelines and the Potable Water Pipelines". Finally,

4 d) The STOF THPO recommends that any previously surveyed areas that do not meet current best practices/professional standards should be revisited and subjected to *systematic* testing of both high *and* moderate probability zones. Again, moderate probability zones should not be ignored.

Thank you again and I will be happy to discuss these items with you at your convenience.

Respectfully,

Bradley M. Mueller, MA, Compliance Supervisor
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