**NFRC - Cultural Resource Surveys**

**Questions for DHR: Preliminary Comments**

**Questions regarding review and required presentation of revisions:**

1. The report revisions will be addressed in a single updated and revised series of reports (one report for each phase) that will include all portions of the project corridor currently accessible.

2. Could we get comment responses back from DHR prior to completing the report revisions?

**General Comments:**

Many of the FDHR General Comments, and several of the reply questions back to DHR have to do with which areas had been surveyed, which areas had not been surveyed, and why. There is also some concern about where along the corridor the various archaeological sites and historic structures were located. In order to convey this information consistently across all three project phases, Gulf Power proposes to implement the following report revisions.

Employ the use of mileposts (0 - 173.75 miles), in tenths of a mile, to describe probability areas (high moderate, low), constraints on fieldwork (tree falls, wetland/inundation, fencing), previously surveyed area (previously tested), and properties to which access was denied (red tracks – there should only be 23 of these tracks remaining).

Creation of a geo-spatial file (geodatabase or shapefile) that contains all of the above information in a standard format that can be quickly accessed using GIS software.

Portions of the corridor that traverse state and federal lands will be clearly delineated and any sites or historic structures associated with these areas will be flagged.

**Phase I Comments/Questions (SouthArc):**

1. Areas excluded due to previous surveys. We’ve never been asked to provide overlays before. Assuming the previous surveys have decent test unit maps that we can correlate to the right-of-ways, what happens if there is no overlay? Would that mean we have to go back and test?

2. Areas not tested due to inundation. First, we are not botanists or wetland biologists so we can’t determine if the wet areas we encountered are permanent (i.e. jurisdictional) or not. Second, what does it matter? Even if they are intermittent, they are extremely unlikely to contain significant cultural resources because no one lives in areas that tend to be wet. They may hunt/gather there, but that generally does not result in “significant” sites. And the goal of a CRAS is to find significant sites, not every little flake scatter in Florida.

3. What do you want us to use as documentation for areas not surveyed? I’m guessing photos, or maybe aerial photos. And this one goes back to the inundation issue as well.

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**Phase II Comments/Questions (SEARCH):**

1. A large portion of the Phase II area falls within the referenced FGT surveys or Apalachicola National Forest so it is particularly important that the report demonstrates sufficient testing during previous surveys.

* SEARCH Response: Most of the area considered “previously surveyed” consisted of Goodwin’s surveys for the FGT pipeline corridor. These reports generally do not include maps showing specific shovel test locations. However, they were reviewed as complete and sufficient by DHR. The current APE is squarely within this previously surveyed area as discussed in section 3.4.1 of the report. Given that we do not have maps showing Goodwin’s individual shovel test placement, please clarify what additional information is needed to demonstrate the sufficiency of previous survey coverage.
* As noted on page 1-4 of the report, US Forest Service Zone Archaeologist Andrea Repp reviewed the APE and determined that no further survey was necessary within the Apalachicola National Forest (ANF) based on the previous coverage within the FGT pipeline corridor and other surveys. Please clarify what additional documentation is necessary regarding the ANF.

2. Aerial imagery, topographic maps, and soil profiles evidencing previous significant ground disturbance that would preclude further subsurface sampling.

Documentation supporting hydric soils that are permanently, rather than seasonally, inundated in areas of standing water.

* SEARCH Response: We intend to respond to these two comment by including additional photographs in the report showing typical areas of disturbance or inundation. Please clarify whether a generalized discussion and illustration of these conditions will be sufficient, or there were any specific segments of concern that require individual discussion/illustration.

3. Historic aerials, maps, and plats referenced in the report narrative.

* SEARCH Response: We intend to include a few additional figures to illustrate select historical features identified during the map review as summarized in Table 3-1. Please clarify if there are any specific references that require illustration.

**Phase III Comments/Questions (Janus):**

1. Areas noted as wet or mucky on shovel tests maps in Appendix G were in low probability areas. Clarify if additional documentation is needed and if so, please explain what specific documentation is being requested.

2. Is providing a set of the earliest available aerials showing the archaeological APE in the Appendices sufficient to address the comment requesting a sample of aerials? If not, please clarify.

3. The Gilliam cemetery in relationship to the historic APE is shown in the Historic Results Section of the report on Figure 69d: Identified Historic Resources (page 126). Are you requesting that a) the transmission line corridor also be included on this map and b) both the corridor and historic resources APE be added to the historic aerial (Figure 87) on page 144?

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