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**To:** [Estabrook, Richard](#)  
**Subject:** DHR Preliminary Comments for North Florida Resiliency Transmission Line CRAS Reports  
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Caution - External Email (jason.aldrige@dos.myflorida.com)

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Hello Rich,

I appreciate your patience in waiting for our comments. I'm including our comments in this email, but I can send a letter, if that is preferable. We have general comments that apply to all reports as well as some specific comments for each report. Please let me know if you have any questions. I'd be happy to discuss over the phone this week if necessary.

General Comments:

- At this time, the three reports are not considered complete or sufficient, primarily due to the need for additional testing in areas that the CRM firms could not access and the need for clarification of areas not tested due to previous CRAS reports, environmental conditions, and disturbance.
- Areas noted in each report as "no access" should be subjected to survey once access is available to these areas.
- Areas excluded due to previous CRAS reports need to be better explained. In particular we request maps depicting the location of shovel test pits (STPs) from previous surveys overlain on aerial imagery to demonstrate that the STPs were excavated within the current APE.
- Areas excluded due to environmental conditions or previous disturbance need to be better explained. The odd "no dig" shovel test is not the main issue, but each report includes long stretches excluded from testing due to environmental conditions or previous disturbance. Areas excluded due to inundation should include documentation that the areas are permanently inundated. For areas excluded due to previous disturbance, that disturbance should be described or shown.
- Reports should include maps of state lands where a 1A-32 permit was necessary to conduct testing. This will assist the Bureau of Archaeological Research as they close out 1A-32 permits.
- A shapefile for the overall project APE.

Phase I: SouthArc

- See general comments.

- In particular, report need additional explanation of "No Survey Needed" areas. Some areas excluded for environmental conditions or previous disturbance also need additional explanation.

#### Phase II: SEARCH

- See general comments. 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.
- 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.
- Maps clearly delineating areas of existing pavement.
- Historic aerials, maps, and plats referenced in the report narrative.

#### Phase III: Janus

- See general comments. Janus' description of environmental conditions and previous disturbance is generally clear in their report. The primary issue would be any areas excluded due to previous testing.
- Historic aerials are referred to, but are not included as figures. The only exception is one newly recorded cemetery (8GD2009, Gilliam Cemetery), for which a historic aerial is provided. The report does have numerous figures of historic plats and maps, but it would be helpful if there was a sample of historic aerials to give a sense of prior land use and conditions.
- The discussion of the Gilliam Cemetery should include a map or aerial photograph showing the cemetery in relation to the project corridor. The historic aerial that is included does not show the project corridor. The reader should not have to scroll through the maps in the appendix looking for the resource. The archaeological site discussions cross-reference the appendix maps but the cemetery discussion does not.

Best,  
Jason

#### Jason Aldridge

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