



POARCH BAND OF CREEK INDIANS

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September 24, 2020

Desiree Estabrook, Project Manager, Tribal Relations
FPLL/Gulf Power, Next Era Energy
700 Universe Boulevard
Juno Beach, FL 33408

RE: THPO 2020-09-002, North Florida Resiliency Connection Transmission Line Project

Dear Ms. Estabrook,

The Poarch Band of Creek Indians, Tribal Historic Preservation Office has received and reviewed the Cultural Resources Survey reports for the referenced project. Based upon the information submitted the following comments are offered on the project and the reports.

SEARCH, Inc. and Janus Research reports contain information on sites within the Area of Potential Effect (APE) that are either considered eligible for the National Register of Historic Places (NRHP) or need additional work to determine eligibility to the NRHP. In each location avoidance or additional work is recommended by the contractors.

SouthArc, Inc. recorded seventeen new sites within the APE. Each site was determined not eligible for the NRHP.

In order to adequately assess the effects of the project on NRHP eligible historic properties information is requested concerning whether and how the sites identified by SEARCH, Inc. and Janus Research for avoidance or additional work, will be avoided or if additional archaeological work is proposed.

Reported field methodology by SouthArc, Inc. appeared to maintain a consistent 25m interval. This interval level has the possibility of missing artifacts and site information between the intervals. Without adequate information a possibly eligible site has the chance of being determined ineligible. Additional information based upon additional shovel testing centered on the positive shovel tests at perhaps 10m-12.5m intervals be conducted to provide more information about the sites is requested.

It is my understanding that a Programmatic Agreement is being developed to address areas that access was not available. The Poarch Band of Creek Indians request to be a party to that Programmatic Agreement.

Thank you for the opportunity to comment on this project. We look forward receiving the additional information requested. Should further correspondence pertaining to the project be necessary, please reference the above file number when responding. If you have any questions, please do not hesitate to call 251-368-9136 extension 2072.

Sincerely,

Larry D. Haikey
Tribal Historic Preservation Officer

Seeking Prosperity and Self Determination

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