



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
NATURAL & HISTORIC RESOURCES, HISTORIC PRESERVATION OFFICE
PO Box 404, Trenton, NJ 08625-0404
TEL: (609) 984-0176 FAX: (609) 984-0578
www.state.nj.us/dep/hpo

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

BOB MARTIN
Commissioner

June 22, 2010

Mr. Gregory Sandusky, County Engineer
County of Mercer Department of Transportation & Infrastructure
McDade Administration Building
640 South Broad Street
P.O. Box 8068
Trenton, NJ 08650

Re: Bear Tavern Road Bridge over Jacobs Creek
Hopewell Township, Mercer County
Alternatives Analysis and Phase 1B Archaeology

Dear Mr. Sandusky:

I appreciate your efforts to consider project impacts on historic properties early in your project planning effort. I thank County Executive Brian Hughes for his May 7, 2010 letter identifying the current project alternatives. The Historic Preservation Office (HPO) now has a fuller understanding of the historic properties in the project area and has determined that there is a historic and cultural significance to the bridge, which must be considered in reviewing the various project alternatives. I recommend that the most productive way to proceed is for us to meet and discuss the alternatives outlined.

In addition, HPO has reviewed the County's submitted archaeological survey report:

Harris, Matthew D., Tod L. Benedict, and Rebecca Yamin
April 2010 *Bear Tavern Road Bridge over Jacob's Creek, Hopewell Township, Mercer County, New Jersey, Phase 1B Archeological Study*. John Milner Associates, Inc., Philadelphia, PA. Prepared for County of Mercer, Office of the Engineer, Trenton, NJ.

We do have technical concerns regarding the Phase 1B archaeological survey report. Our technical concerns are provided below:

1. The survey does not meet the HPO's Phase I archaeological survey requirements at N.J.A.C. 7:4-8.4. Specifically, the survey employed fifteen 4-inch bucket auger tests and one shovel test to determine whether archaeological resources were present within the project's area of potential effects. However, N.J.A.C. 7:4-8.4(c)3iii requires the use of 12-inch diameter shovel test pits. In addition, the use of metal detecting has become a standard method of identifying Revolutionary War (and other battlefield related) archaeological material. With this in mind, in our letter dated October 27, 2009, the HPO requested that the Phase IA archaeological survey evaluate the potential effectiveness of metal detection as a strategy for identifying Revolutionary War period archaeological material that may be present within the project site. However, this was not addressed in the archaeological survey report. Furthermore, the report did not include any justification for the methods used in the survey.
2. The survey methodology does not describe (1) the sampling design used for survey, including justification for excluding areas from subsurface testing, and (2) stratification of the survey area into areas of high, medium, low, and no potential for the presence of archaeological sites. While detailed background research was performed and reported in the Phase IA archaeological survey report, no model predicting the likelihood for sites to exist within the project's area of potential effects was developed pursuant to N.J.A.C. 7:4-8.4(c)2.
3. The survey report does not meet the Office's archaeological survey reporting requirements at N.J.A.C. 7:5-8.5(a). Specifically, the report did not include a USGS map depicting the project site or a soil map depicting the project site, pursuant to N.J.A.C. 7:4-8.5(a)9vi and N.J.A.C. 7:4-8.5(a)9vii, respectively.
4. The report does not include a CD with a PDF version of the report as required by N.J.A.C. 7:4-8.9(a)2.

I look forward to meeting to discuss the project with you and hearing directly about the engineering design constraints you have considered in developing the project. At the meeting, it also would be helpful to discuss how the flexibility that AASHTO allows when historic properties are impacted by a project may assist in project development. These discussions will help identify a final preferred alternative.

If you have any questions, please feel free to contact me at (609) 633-2397.

Sincerely,



Daniel D. Saunders
Acting Administrator and
Deputy State Historic
Preservation Officer

C: Michael Markulec, Mayor, Hopewell Township
Paul Pogorzelski , Administrator/Engineer, Hopewell Township
Pamela Crabtree, Chair, Hopewell Township Historic Preservation Commission
Cate Litvack, Crossroads of the American Revolution, Inc.
Beth Kerr
Rhonda Katz
David Blackwell
Charlie Welch