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DEPARTMENT OF ENVIRONMENTAL PROTECTION

NATURAL & HISTORIC RESOURCES
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FEDERAL ENERGY
REGULATORY COMMISSION

KIM GUADAGNO
Lt. Governor

October 22, 2015

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

ORIGINAL

Dear Ms. Bose:

As Deputy State Historic Preservation Officer for New Jersey, in accordance with 36 CFR Part 800: Protection of Historic Properties, as published in the *Federal Register* on December 12, 2000 (65 FR 77725-77739) and amended on July 6, 2004 (69 FR 40544-40555), I am providing Consultation Comments for the following proposed undertaking:

Hunterdon and Mercer Counties
Phase I Archaeological Survey
PennEast Pipeline
Docket No. CP15-558-000
Federal Energy Regulatory Commission

800.4 Identification of Historic Properties

The Historic Preservation Office (HPO) was recently provided with the opportunity to review and comment of the following Phase I archaeological survey report, received at this office on September 24, 2015, for the above-referenced undertaking:

Ziesing, Grace H. Joseph Kwiatek, Eileen Hood, Robert Kingsley, and Brian Albright
2015 *Phase I Archaeological Survey Report, PennEast Pipeline Project, Hunterdon and Mercer Counties, New Jersey, Volume I: Report Text*. Prepared for PennEast Pipeline Company, LLC Wyomissing, Pennsylvania. Prepared by URS, Burlington, New Jersey.

And

Ziesing, Grace H. Joseph Kwiatek, Eileen Hood, Robert Kingsley, and Brian Albright
2015 *Phase I Archaeological Survey Report, PennEast Pipeline Project, Hunterdon and Mercer Counties, New Jersey, Volume II: Appendixes*. Prepared for PennEast Pipeline Company, LLC Wyomissing, Pennsylvania. Prepared by URS, Burlington, New Jersey.

The HPO has reviewed the above-referenced report. We are unable to agree with the recommendations within the report at this time. We are concerned that the field testing protocol employed during the Phase I archaeological survey does not appear to be consistent with the *New Jersey Historic Preservation Office Guidelines for Phase I Archaeological Investigations: Identification of Archaeological Resources*, available through the HPO's web page at: (<http://www.nj.gov/dep/hpo/lic/identify/survarkeo.htm>). Specifically, Phase I archaeological survey must penetrate the full depth of intact Holocene soils. Based on the information provided, it is unclear whether full penetration of Holocene deposits has been achieved by the shovel testing protocol employed. The HPO requests clarification regarding the field methodology employed before an assessment of the recommendations made within the report can appropriately be evaluated by this office.

Additional Comments

In this project, we are asked to review a large, but partial (due to landowner objection) report quickly. That task is made more difficult because the format of the submitted report does not meet the HPO's *Guidelines for Preparing Cultural Resources Management Archaeological Reports Submitted to the Historic Preservation Office*:

1. A review of the documentation submitted indicates that report figures were included as an appendix to the report. HPO reporting guidelines stipulate that figures, plates, and tables should be incorporated into the text on the page(s) following their citation to reduce the time needed to review a report. They should not be appended to the report.
2. A review of the survey mapping indicates that the map keys are incomplete. Specifically, features represented on the maps detailed in Figure 17 are not appropriately coded to the map key. For example, "Figure 17. Results of archaeological survey, New Jersey (map 52 of 54)" includes two point features not referenced in the key: an orange point feature and a black point feature ringed in red. Please update the mapping to clarify these features.
3. According to the report, the project's area of potential effects (APE) was divided into survey segments to facilitate data management. For a majority of the survey alignment, the segments are numerically sequential geographically, ascending west to east. However, in certain instances the survey segments deviate from this organization making use of this system difficult to reference. The report should include data for the mileposts that bound the survey segments as part of the attribute data for each survey segment referenced in the text of the report.
4. A review of the shovel test log included with the report indicates that the documentation is incomplete. Please revise the shovel test log to also include information pertaining to the soil horizons corresponding to each stratigraphic layer identified.
5. Mapping for the sensitivity model that was developed and included in the HPO-approved Scope of Work for this undertaking is not included within the report. Please add this mapping to Chapter 3 of the report.
6. It appears that a project-specific system of organization and notation for the block and lot data associated with parcels included within the APE for this undertaking has been utilized.

While this may assist the applicant with the management of the project internally, this system has no basis for reference to the HPO. The HPO requests that the documentation be revised to include the actual block and lot data for each parcel as employed in earlier documentation, such as the HPO-approved Scope of Work.

7. In several instances it is indicated that specific background deed research was conducted for parcels within the APE. However, details of the results of this research are not included within the report beyond summary reference within the text. Please revise the report to include the results of parcel-specific deed research in tabular form.
8. Several cultural landscape features, such as historic fieldstone walls, were identified during pedestrian survey of the APE. However, a review of the mapping detailing survey results does not include the location of these features. Please revise the mapping for the undertaking to include all cultural features identified during Phase I archaeological survey.

Thank you for providing the opportunity to review and comment on the potential for the above-referenced project to affect historic properties. The HPO looks forward to further consultation regarding the development of the proposed undertaking and receiving the requested documentation for review and comment. Once the HPO receives the info requested above, we will be able to continue reviewing the archaeological survey. If additional consultation with the HPO is needed for this undertaking, please reference the HPO project number 14-4462 in any future calls, emails, or written correspondence to help expedite your review and response. Please do not hesitate to contact Jesse West-Rosenthal (609-984-6019) of my staff with any questions regarding archaeology.

Sincerely,



Daniel D. Saunders
Deputy State Historic
Preservation Officer

Cc: Eric Howard, FERC
Grace Ziesing, URS

DDS/KJM/JWR

Document Content(s)

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