



FLORIDA DEPARTMENT of STATE

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Richard W. Estabrook, Ph.D. RPA
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September 11, 2020

RE: DHR Project File No.: 2019-4593, Received by DHR: August 4, 2020
*Cultural Resources Assessment Survey for the Gulf Power North Florida Resiliency Connection
Transmission Line Project in Columbia, Suwannee, Madison, Jefferson, Leon, Gadsden and Jackson
Counties, Florida*

Dear Dr. Estabrook:

The Florida State Historic Preservation Officer reviewed the referenced cultural resources assessment survey (CRAS) as part of our ongoing consultation with Gulf Power and the US Army Corps of Engineers (USACE) regarding the Gulf Power North Florida Resiliency Connection (NFRC) Transmission Line Project associated with USACE permit number SAJ-2019-02766. This review was conducted in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended, and its implementing regulations in *36 CFR Part 800: Protection of Historic Properties*. The project is also subject to a Florida Department of Environmental Protection permit, 12-0379587-001-EI, however that permit is conditioned on completion of the Section 106 process associated with the USACE permit.

The above mentioned CRAS report was completed in three phases or segments. On behalf of Gulf Power, SouthArc, Inc. completed Phase I, SEARCH, Inc. completed Phase II, and Janus Research completed Phase III. These surveys address approximately 93% of the project's Area of Potential Effect (APE). The remaining portion of the APE will be addressed once additional access along the project easement is secured. Our comments below address each of the three CRAS segments.

Cultural Resources Assessment Survey, North Florida Resiliency Connection, North Phase I Segment, Columbia and Suwannee Counties, Florida – SouthArc, Inc.

SouthArc conducted fieldwork for the Phase I area between March and September 2019. SouthArc identified 17 new archaeological sites (CO1443-CO1454 and SU569-SU573), two previously recorded linear resources (SU426, SU509), and one resource group (CO1437) including 7 contributing structures (CO1461-CO1467). There were a number of previously recorded historic properties within or adjacent to the APE. However, SouthArc did not identify these properties during fieldwork within the APE and determined that those properties were no longer extant or were incorrectly mapped in the Florida Master Site File.

Of the historic properties identified within the APE, SouthArc recommended the linear resources, SU426 and SU509, as eligible for listing in the National Register of Historic Places (NRHP). SouthArc recommends that neither linear resource will be adversely affected by the proposed transmission line. SouthArc recommended the remaining properties as not eligible for listing in the NRHP and recommended no additional work.

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Based on the information provided, our office concurs with the survey results and NRHP evaluations presented in the report. We find SouthArc's report to be complete and sufficient in accordance with Chapter 1A-46, *Florida Administrative Code*.

Cultural Resource Assessment Survey of Phase 2 of the North Florida Resiliency Connection Transmission Line Project in Jefferson, Leon, Madison, and Suwannee Counties, Florida – SEARCH

SEARCH conducted fieldwork for the Phase II area between April 2019 and July 2020. SEARCH identified 39 archaeological sites (JE73, JE222-JE224, JE230, JE359, JE2057-JE2063, JE2095, LE538, LE2095, LE2105, MD14, MD15, MD18, MD83, MD89, MD92, MD107, MD212, MD213, MD321, MD337-MD346, MD422, SU567). SEARCH identified 73 historic resources (structures - JE158, JE2001-JE2054, LE6441, MD84, MD330-MD335, historic district – JE2056, linear resources – JE1607, JE1992, JE2055, LE909, LE2025, LE5497, LE6442, MD336, and cemeteries – LE5694, JE2043, MD333).

SEARCH recommends archaeological sites LE2105, MD107, MD321, MD345, and SU422 as NRHP-eligible and recommends avoidance or further investigation. SEARCH also recommends avoidance or further investigation for NRHP-eligible or unevaluated archaeological sites JE67, JE872, JE880, JE881, LE154, LE2102, and LE5354, which are located within areas with access restrictions or within previously sufficient Phase I surveys. SEARCH recommends avoidance for historic resources MD336 and JE2040. SEARCH recommends all other historic properties identified within the APE as not eligible for listing in the NRHP.

In August 2020 SEARCH also provided a supplemental report, *Technical Memorandum Cultural Resources Assessment Survey of State Lands North Florida Resiliency Connection Transmission Line Project Leon, Jefferson, Madison, and Suwannee Counties, Florida*, to address portions of the APE within state lands including, Plank Road State Forest, Wakulla State Forest, the Tallahassee-St. Marks Historic Railroad State Trail, and Lake Talquin State Forest. Our office previously accepted this supplemental report and did not recommend additional testing in these areas.

Phase II included 88 miles, of which SEARCH considered approximately 27.5 miles to be sufficiently tested during previous CRASs. An additional 5.6 miles was not tested due no landowner permission to access or the known presence of NRHP-eligible archaeological sites. Areas with restricted access will need to be surveyed for cultural resources.

Based on the information provided, our office concurs with the survey results and NRHP evaluations presented in the report. We find SEARCH's report, with inclusion of the technical memorandum, to be complete and sufficient in accordance with Chapter 1A-46, *Florida Administrative Code*.

Cultural Resources Assessment Survey Gulf Power North Florida Resiliency Connection Phase III Leon, Gadsden, and Jackson Counties, Florida – Janus Research

Janus Research (Janus) conducted fieldwork for the Phase III area between April 2019 and July 2020. Janus identified 16 archaeological sites, including 4 previously recorded sites (GD21, GD24, GD122, and GD148) and 12 newly recorded sites (GD2034–GD2042, GD2269-GD2270, and JA2082). Janus also identified one previously recorded structure (GD831), one previously identified linear resources (LE5209), seven newly recorded structures (LE6433-LE6439), one newly recorded cemetery (GD2009), one newly recorded railroad bridge (GD2011/LE6440), and a newly recorded railroad segment (GD2010).

Janus recommended the Pensacola and Georgia Railroad (GD2010/LE5209) and a contributing bridge (GD2011/LE6440) as eligible for listing in the NRHP. Janus also recommended that there is insufficient information to determine the NRHP-eligibility for GD21, GD2036, GD2270, and JA2082. Janus recommends avoidance or if

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avoidance is not feasible additional investigations and/or effects evaluations for these historic properties. Janus recommends the remaining historic properties as not eligible for listing in the NRHP as expressed within the APE and no further work.

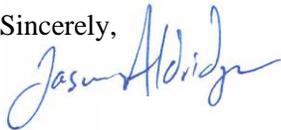
Janus surveyed 33.4 miles (88%) of the approximately 37-mile Phase III corridor. Surveys of inaccessible areas will be completed once access is obtained and the results will be documented in an addendum report.

Based on the information provided, our office concurs with the survey results and NRHP evaluations presented in the report. We find Janus Research's report to be complete and sufficient in accordance with Chapter 1A-46, *Florida Administrative Code*.

The remaining portions of the APE which could not be surveyed due to restricted access should be subjected to a CRAS once access is available. In addition, any additional areas not addressed in this CRAS, such as staging areas or changes to the APE, will also need to be subjected to a CRAS. The effects determination for the NFRC Transmission Line and the treatment of NHRP-eligible or potentially eligible historic properties will be determined through further consultation between our office, Gulf Power, and the USACE.

If you have any questions, please contact me by email at Jason.Aldridge@dos.myflorida.com, or by telephone at 850-245-6344.

Sincerely,



Jason Aldridge
Deputy State Historic Preservation Officer
for Compliance Review