

December 16, 2010

Mr. Edgar W. García
Department of Defense
Jacksonville District Corps of Engineers
Antilles Office
400 Fernández Juncos Av.
San Juan, Puerto Rico 00901-3299

RE: Response to Public Notice for the Vía Verde natural gas pipe line project (Permit Application No. SAJ- 2010-02881 (IP-EWG))

Dear Mr. García:

In response to the Public Notice dated November 19, 2010, concerning the above referenced project, I hereby present my comments and concerns with the archaeological Phase 1A report that is included in the DIA-P submitted by the proponent. This report presents major inadequacies, which clearly constrain its use by the COE for the assessment of the effects that this undertaking will have of historic properties that are listed or potentially eligible for inclusion in the National Register of Historic Places, as required in Section 106 of the National Historic Preservation Act of 1966, as amended. My major concerns with said archaeological assessment are listed below:

- The inventory of archaeological sites included in the report presents major omissions, which limit its use for addressing the archaeological sensitivity of the area of potential effects of this project. Examples of these omissions include the Adjuntas 1 site documented by Irving Rouse more than half a century ago, located in the Pellejas Valley, which is crosscut by the right of way of this project. Additional examples include the archaeological Phase II studies conducted by Goodwin and Associates in the Río Cocal 1 site located in NSGA Sabana Seca published in 2003 and the Phase II and mitigation research conducted by SEARCH Inc. on behalf of the COE in the AR-38 and AR-39 sites in Arecibo published in 2008, both of which lie on the immediate vicinity of the area of potential effects of this project. Therefore, **a thorough revision of the inventory of historic properties, academic literature, and contract reports is warranted for evaluating with higher resolution the archaeological sensitivity of the area of potential effects of this project.**
- **The methods used for the walkover survey that were implemented are deficient.** No systematic protocol was established for the archaeological reconnaissance, which was basically conducted in a random fashion. According to the limited methodological information provided in the report, the walkover survey was undertaken mostly along a single transect vector, thus limiting the potential of this prospection for identifying resources across the full lateral extent of the area of potential effects of the project (150 feet). Furthermore, no criteria for predictive modeling, a basic tool in archaeological large-scale surveying, were ever devised, which drastically limits the capability of the implemented survey to detect additional sites in the right of way of the project.

- Of major concern is the fact that the archaeological survey did not include considerable portions of the proposed undertaking. **In fact, of the 92 miles of the right of way of this project, the archaeological surface reconnaissance only covered 27.6 miles (30 percent), drastically limiting the ability of all interested parties to determine the effects that this activity might have on historic properties yet undiscovered.** For instance, only .6 miles were prospected out of the initial 20 miles of the project, leaving unsurveyed all terrains from PR-2 in Peñuelas to the Pellejas Valley in Adjuntas because, according to the archaeologists, the area was “inaccessible” (pp. 253). Other areas that were not surveyed include the tracts between: miles 21 to 24.7 (pp. 253-254), miles 26 to 42.9 (pp. 255), miles 54 to 59 (see Figure 46 in pp. 261), miles 63 to 65 (pp. 263-264), miles 67.3 to 67.6 (pp. 267), miles 68 a 70.1 (pp. 267), miles 72 to 75 (pp. 268), miles 77 to 78 (pp. 269-270), miles 80 to 82 (pp. 270), miles 83 to 85 (pp. 272) and miles 85 to 92 (pp. 273). Thus, **in order for the COE to have the necessary criteria for evaluating this project, a full surface reconnaissance of the rest of the areas (the unsurveyed 70%) to be impacted by this project needs to be conducted.**
- The aforementioned situation is worsened when we consider that **no archaeological (or environmental) assessments were made in the areas where the access roads that need to be established for moving the heavy machinery and other equipment that will be used in the installation of the pipe and the delimitation of its right of way are to be located.** Furthermore, no additional work was conducted on the staging areas that need to be established for the horizontal directional drilling, which tend to be larger in horizontal extent than the rest of the areas of the right of way of the project.
- Another major concern is that, at present, not only has the surface reconnaissance not covered the full extent of the area to be directly or potentially impacted by this project, but also that **no subsurface testing program has been implemented in order to detect additional historic properties.** The need for the implementation of a systematic subsurface testing program along the proposed route of the right of way of the project, as well as of the access roads for transporting equipment and heavy machinery and its staging areas is vital in order to get a detailed panorama of the historic properties that are to be affected by this undertaking. Only then will the COE be able to make an informed evaluation of the alternatives for mitigating the adverse effects that it might have on the cultural properties that are to be impacted by this project.

As an archaeologist with two decades of experience in the field and as a former Specialist in Historic Properties for the PRSHPO, it is my hope that the concerns hereby presented are considered by the COE for assessing the potential effects that this undertaking will have on historic properties.

If you have any further questions or concerns, do not hesitate to contact me at (787)207-7318 or at reniel.rodriguez@upr.edu.

Cordially,



Reniel Rodríguez Ramos, Ph.D.