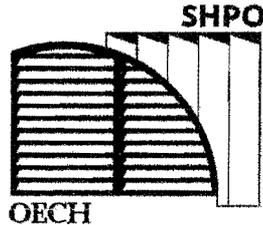


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U.S. ARMY CORPS  
OFFICE OF ENVIRONMENTAL  
2010 DEC 16 A 10-22  
ANTI-EIS PERMITS SECTION

September 17, 2010

Eng. Miguel A. Cordero, P.E.  
Executive Director  
PR Electric Power Authority  
G.P.O. Box 364267  
San Juan, PR 00936-4267

**SHPO 08-03-10-01 DRAFT ENVIRONMENTAL IMPACT STATEMENT, VÍA VERDE  
PROJECT, ISLANDWIDE, PUERTO RICO**

Dear Eng. Cordero:

We received on September 10, 2010 the draft Environmental Impact Statement (draft EIS) prepared for the Vía Verde project. Because of the size of the PDF document (over 2,000 pages), we recommend that, in the future, the various chapters be divided into separate files to facilitate the review. Our comments address the potential effects implementation of the project may have on historic resources. Based on the draft EIS, it appears likely that, in order to implement the project, a permit from the U. S. Army Corps of Engineers (USACE) will be needed, therefore, requiring compliance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulation 36 CFR Part 800: Protection of Historic Properties.

We have focused our attention on Appendix 5, titled: Estudio Fase IA (Stage IA), which documents the initial archival background research and walkover surface survey carried out to identify cultural resources that may be affected by the undertaking. The Section 106 consultation process is a four step review process consisting of 1) initiating the process, 2) identifying historic properties, 3) assessing project effects on historic properties, and 4) resolving adverse effects. Officially, initiation of the process is pending notification by USACE; however, in the meantime, we can provide comments on the document submitted for our review.

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PUERTO RICO  
VERDE

Miguel Codero  
September 17, 2010  
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Overall, the Stage IA report lacks a table of contents which, in an over 300 page document, greatly hinders its review. In the introduction, it should state that it was prepared pursuant to the requirements of Section 106 of the NHPA and its implementing regulation, 36 CFR Part 800. The culture history review (**VI. Síntesis Cronológica Precolombina**) should use consistent terminology to avoid confusion. While various cultural chronologies have been proposed for the Caribbean, when one is specifically identified as being used to describe this history, it then should be consistent with that specific model. In this particular case, the report purports to use the model published by Irving Rouse in 1952 (Which proposed an initial occupation of Puerto Rico starting around A.D. 850) without referencing Rouse's various revisions and expansion of the model, culminating in the one he published in 1992. All the while, the culture synthesis uses Rousian classificatory terms, such as "Series," "Sub-Series" (Which had not yet been developed by Rouse in 1952.) and "Style" interchangeably (they have different meanings), which serves to muddle further the cultural chronology of Puerto Rico.

Several highly relevant archaeological survey and data recovery reports have been prepared as part of the Río Grande de Arecibo Flood Control project. These should be reviewed. In addition, the U.S. Navy extensively surveyed the lands of the former NSGA Sabana Seca in Toa Baja. While the sites discovered during these surveys are listed in the tables of the Stage IA, they are not plotted in the maps, nor are the various reports generated from those surveys referenced in the document. These are very important sources of information regarding sites found within the former U. S. Navy base. As it stands, the proposed alignment appears to pass directly through the Río Cocal 1 (SS-2) archaeological site, a property with late prehistoric (including human burials) and early colonial components, previously determined eligible for inclusion into the National Register of Historic Places by both the U.S. Navy and our Office.

Chapter XI documents that a surface survey was carried out along most of the gas pipeline route with the exception of the section between PR-2 and Valle Pellejas (roughly 15 miles long), which the report describes as inaccessible at the time. Access to this area needs to be established.

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Regarding subsurface testing (Stage IB), the report recommends carrying this out in parts of Utuado and most of the west - east portion of the route (Arecibo - Guaynabo), with the exception of the area within Ciénaga Tiburones (miles 45 - 51.5) and an area in Bayamón - Guaynabo (miles 85.5 - 90). As for the south - north route reaching to Utuado, it does not recommend subsurface testing in a general sense (see figure 48, page 275). Bearing in mind that a sizeable portion has yet to be surface surveyed (PR-2 to Valle Pellejas), a blanket statement is premature. In addition, there may be areas within the mountainous region level enough to warrant subsurface testing.

As for the realignment recommendations presented in the Stage IA, this should be postponed until the totality of historic properties that may be affected by the undertaking has been established; this, to prevent moving the alignment so as to avoid one site, only to end up impacting another one, yet to be discovered.

Overall, the process of identifying historic properties that may be affected by the Vía Verde project is ongoing. We await the subsurface testing (Stage IB) results of the areas recommended in the Stage IA report, in addition to those areas within the mountainous regions with the characteristics that warrant it. Once the Stage IA-IB efforts are completed, USACE, in consultation with our Office will need to evaluate the historic significance of those cultural resources that may be affected by the undertaking and asses those effects.

If you have any questions, please contact Miguel Bonini of our Office at 787-721-3737 or by e-mail at [mbonini@prshpo.gobierno.pr](mailto:mbonini@prshpo.gobierno.pr).

Sincerely,



Carlos A. Rubio Cancela, Architect  
State Historic Preservation Officer

CAR/BRS/MB

c. JCA