

APPENDIX E
SHPO CORRESPONDENCE

May 6, 2003

Ms. Therese M. Fulmer, Manager
Environmental Studies
Delaware Department of Transportation
800 Bay Road, P.O. Box 778
Dover, DE 19904

RE: Milton Truck Route Bypass, Sussex County, DE; State Project No. 21-046-01; Federal Aid Project No. ESTP-S319(1); management summary of cultural resource surveys

Dear Ms. Fulmer:

On April 7th, 2003, we received a management summary prepared by DelDOT's consultant, Parsons, describing the results of a Phase I (identification) level archaeological survey and a Phase II (evaluation) level architectural survey conducted for the above-referenced undertaking. We have reviewed the management summary, and would like to offer the following comments regarding the conclusions and recommendations contained therein.

Architectural Survey:

The consultant concluded that three of the five surveyed properties are not eligible for the National Register of Historic Places; these properties include: a ca. 1937 bungalow (S-3461); a ca. 1925 box culvert (Bridge 918, S-9850); and a ca. 1944 dwelling (S-9851). The consultant recommended that the other two properties, Bridge 806, a ca. 1917 box culvert (S-9849), and the Draper/Bonk House (S-3527) are eligible for the National Register. Your cover letter indicates DelDOT's agreement with the consultant's recommendations regarding the results of the architectural survey, but suggested that both substantive and technical clarifications to the report are needed. We generally agree with the evaluations, and also with DelDOT's comments on the report.

Archaeological Survey:

The management summary describes archaeological survey of several selected areas in the project limits (Areas A through H), although it appears that some additional areas were surveyed but were not designated with a survey area letter. The summary states that the survey resulted in the identification of four historic sites. However, it is unclear why some areas from which artifacts were recovered were designated "sites" and others were not (i.e., Survey Area C). The consultant also concludes that "adequate investigation was conducted" and that no further archaeological work is needed, but does not explain for what purpose the investigation is deemed adequate. If the nature of the project's physical impacts remain as DelDOT has previously described to us, then it is likely that the level of effort was sufficient to identify archaeological sites in the project area. However, the management summary's conclusions and recommendations are not framed within the context of the federal and state guidelines for archaeological surveys, or the steps of Section 106 process, and therefore do

not provide a clear path forward for this aspect of the consultation.

In our view, the information in the management summary is not sufficiently complete to allow us to reach the same conclusions about the need for additional work. We agree that areas from which no artifacts were recovered (i.e., Area E and Area F) do not require further testing. However, additional discussion regarding the other tested areas, particularly Area B ("the Driveway Site") and Area A ("the Plum Site"), is needed in order to reach consensus on which Areas need further work to assess National Register eligibility. If no further work is necessary to make such assessments, there should be a clear understanding as to why this is the case. Additionally, DeIDOT's cover letter indicates that further work at the former mill locations at Bridges 918 and 806 may be needed. Although these potential sites will likely be addressed by monitoring during construction rather than conventional survey, the management summary should include a discussion of these locations and their archaeological potential.

We have additional comments on the report which we will submit under separate cover. In order to move this project forward, it would also be helpful if DeIDOT and SHPO staff could meet to discuss the archaeological survey in the near future. Thank you.

Sincerely,

Daniel R. Griffith
Director/State Historic Preservation Officer

cc: Robert Kleinburd, Realty & Environmental Specialist, Federal Highway Administration
Carolann Wicks, Director, Division of Transportation Solutions, DeIDOT
Patrick Carpenter, Historian, DeIDOT
Kevin Cunningham, Archaeologist, DeIDOT
Michael C. Hahn, Senior Highway Planner, DeIDOT
Brian Page, Historic Preservation Planner, Sussex County Dept. of Engineering