

February 15, 2000

MEMORANDUM TO: Rosetta Virgilio, Federal Liaison
Office of State Programs

FROM: Cynthia A. Carpenter, Chief/**AR**/
Generic Issues, Environmental, Financial, and Rulemaking Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

SUBJECT: PENNSYLVANIA STATE HISTORIC PRESERVATION OFFICE
SURVEY ON CULTURAL RESOURCE MITIGATION

By e-mail dated February 7, 2000, you requested assistance from the Generic Issues, Environmental, Financial, and Rulemaking Branch (RGEB) of the Office of Nuclear Reactor Regulation (NRR) with completing a survey on creative cultural resource mitigation issued by the Office of the Pennsylvania State Historic Preservation Officer. Attached is input from NRR for the survey.

The survey specifically requested information regarding "agency" actions and not actions under Federal authority. Since the NRC is a permitting agency with no land management responsibilities, the following activities were performed by NRC licensees and not by the agency itself. Furthermore, these activities may not have been associated with a Federal action. The survey requests information over the history of the agency's existence, although only information for fiscal years 1992, 1994, 1995, 1996, 1997, 1998, and 1999 is provided from previous Department of Interior archeological surveys. Therefore, only positive responses are provided, as RGEB cannot verify activities occurring in years for which data is not available. As the State did not intend for the survey to be exhaustive in nature, the following information should be sufficient for its purposes. If you have any questions or comments, please contact Cynthia Sochor at 415-2462.

Attachment: Pennsylvania State Historic Preservation Office Survey

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Attachment: Pennsylvania State Historic Preservation Office Survey

Distribution: CSochor BZalcman CCarpenter KLeigh RJolly
Central Files PUBLIC

DOCUMENT NAME: g:\css\pashposurvey.wpd

OFFICE	RGEB	SC:RGEB	BC:RGEB
NAME	CSochor	BZalcman	CCarpenter
DATE	2/14/00	2/14/00	2/15/00

OFFICIAL RECORD COPY

ATTACHMENT

CULTURAL RESOURCE MITIGATION SURVEY

1. Have you or your agency ever prescribed or implemented **Traditional Mitigation Measures**, such as:

- HABS/HAER recordation for a historic resource to be demolished, or
- Data recovery of archeological resources, or
- Employing the Secretary of Interior's Standards for Rehabilitation, or
- Developing a marketing plan for the transfer or reuse of historic properties>

Yes No

If so, please provide a description of the mitigation and affected resources below*

Ex. 1

The Connecticut Yankee Atomic Power Company, the licensee for the decommissioning Haddam Neck Plant in Connecticut, performed a Historical Architecture Engineering Record of the plant for the National Park Service. The licensee stated that the information gathered may be used by the State Historical Commission as an exhibit in a museum. (FY-99)

Ex. 2**

The Three Mile Island site in Pennsylvania is nearby the former Native American town of Sasquesahanaugh, which was on the east side of the Susquehanna River and was inhabited by the Susquehannock Indian tribe. Their influence extended over a large area. In 1967, the Pennsylvania Historic and Museum Commission conducted an excavation that yielded over a thousand artifacts including arrow heads, knives, drills, scrapers, and pieces of broken pottery. Some were estimated to be from as early as 4000 B.C. For this reason, there is a local interest by amateurs for surface hunting for artifacts. The surface hunters were primarily employees of GPU Nuclear. Two of the employees also assisted a group of local high school students on a surface hunt in July 1992. (FY-92)

**applicable to Question #4 below also

2. Have you or your agency ever developed or implemented **Public Benefit/Education Mitigation**, such as:

- Preparing an educational curriculum within schools or the local community which incorporates public education about cultural resources; or
- Authoring articles for popular publications, preparing brochures, interpretive signage or exhibits highlighting local history or the affected cultural environment?

Yes _____ No _____

If so, please provide a description of the public benefit/education mitigation below.*

3. Have you or your agency developed or implemented **Innovative Mitigation**, such as:

- Incorporating design modifications into physical project improvements (highway realignment; design of architecturally compatible new construction adjacent to historic properties; landscape design, etc.) to avoid or minimize impacts to cultural resources; or
- Developing easements or covenants for the protection of cultural resources; or
- Drafting historic preservation plans or ordinances; or
- Establishing a gift of goods or services for specific historic preservation purposes as mitigation for adverse impacts to cultural resources?

Yes No

If so, please provide a description of the mitigation below.*

Ex. 1

In fall 1991 through spring 1992, Northern States Power, licensee for Prairie Island in Minnesota, commissioned an archeologist to conduct an archeological survey. The area of the investigation is owned by Northern States Power and involved the entire right-of-way for a new access road. The archeologist's report was submitted to the state archeologist. The state found that Indian Burial Grounds existed and marked off the area. The land use planning for the road was modified to preserve the sensitive area. (FY-92)

Ex. 2**

The Old Pickens Presbyterian Church (and Cemetery) is the only historic property within the 1-mile radius of Oconee Nuclear Station. In recent years, a group of Oconee employees have worked with members of the Pickens Presbyterian Church, a local Garden Club, a Boy Scout troop, and US Forest Service Employees in a cooperative effort to improve the wildlife habitat aspects of the grounds surrounding this church. The church is undergoing renovation, and the property has been listed on the National Register of Historic Places. The Oconee Nuclear Station is located in Seneca, South Carolina. (FY-99)

** applicable to question #4 also

4. Have you or your agency developed or implemented more **Structured Mitigation Processes** or **Formal Agreements**, such as:

- Developing creative partnerships or joint development initiatives formed between public, private or non-profit organizations to achieve project mitigation; or
- Contributing to local historic preservation efforts in the form of facility or staff sharing arrangements to accomplish specified preservation goals identified in a community; or
- Developing an off-site mitigation?

Yes No

If so, please provide a description of the mitigation agreements or plans below.*

Ex. 1

** see narrative for Three Mile Island under question # 1

Ex. 2

** see narrative for Oconee Nuclear Station under question #3

5. In light of the recently revised Section 106 regulations and the emphasis on public involvement, have you or your agency's public involvement strategies implemented as part of the Section 106 process yielded creative mitigation results?

Yes____ No____

Please explain.

6. Do you feel that implementing creative cultural resource mitigation measures generally costs more than carrying out traditional mitigation?

Yes____ No____

Please explain.

*Please describe specific projects, or general techniques which demonstrate cultural resource mitigation efforts, or land planning or public involvement strategies which effectively mitigate adverse effects to cultural resources or promote historic preservation efforts. Please attach additional sheets of paper, photographs, MOA's, correspondence, pamphlets or other materials which demonstrate previously implemented mitigation efforts, or proposed mitigation strategies.