



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

March 26, 2008

U.S. Army Corps of Engineers
Philadelphia District
Regulatory Branch
Attn: Jim Boyer
100 Penn Square East
Philadelphia, PA 19107-3390

RE: 07-0722-101-D
COE: Draft Phase IB/II Archaeological Report
Proposed SugarHouse Casino Project,
City of Philadelphia

Dear Mr. Boyer:

The Bureau for Historic Preservation (the State Historic Preservation Office) has reviewed the above named report in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1980 and 1992, and the regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation as revised in 1999 and 2004. Our comments are as follows:

1. In our opinion, additional testing should be carried out in the area where British Redoubt No. 1 is believed to have been located. This testing should be conducted under Penn Street and also in the untested area to the east of Penn Street and Trench 16 as shown in Figure 45.
2. In our opinion, additional geomorphological investigations are needed for this project. We recommend another series of geotechnical trenches aligned along what is depicted as the landward side of the shoreline on the 1797 map, to the north and east of Trench 16 as shown in Figure 12. We also recommend additional geomorphological investigations in the areas of both the Beach Street Power Station and the Pennsylvania Sugar Refining Company. The purpose of the additional geomorphological work is to gain a better understanding of the location of the historic shoreline and to further assess the potential for any maritime-related archaeological resources and any other buried historic or prehistoric ground surfaces. If such resources are found during this work, our office should be contacted and additional work may be necessary.

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3. Six shaft features are recommended for data recovery, and we agree with this recommendation. However, in our opinion, this report should explain in more detail why only six of these features are recommended for mitigation. The report should also explain specifically why Features 3, 22 and 41 (all described as soil discolorations) and Features 97, 127, 128 and 133 (all described as shaft or brick features) were not evaluated as part of the Phase II. Unless there is a sound justification for not evaluating these features, they should be evaluated.

4. This report (pp. 111-112) indicates that of the 33 features identified during the Phase IB, five were subjected to evaluation-level analysis during the Phase II. The report also indicates that of the 36 additional features identified during the Phase II, 20 were subjected to evaluation-level analysis. This report should explain in detail why the majority of these features were not subjected to evaluation-level analysis. As noted above, there should be a sound justification for not evaluating these features. Otherwise, these features should be evaluated.

5. Are there any former "yard areas" near Feature 39 (late eighteenth century foundation) available for testing? If so, testing should be carried out in these locations.

6. We agree with the recommendation that the prehistoric component of site 36 Ph 137 is eligible for listing in the National Register of Historic Places for its information potential concerning the prehistory of Philadelphia. Because the site area appears to be relatively small, in our opinion, 100 percent of this site should be excavated as archaeological mitigation. This should be stipulated in a Memorandum of Agreement along with any other archaeological mitigation to be performed such as that recommended for various shaft features located within the project area.

7. The Area of Potential Effect (APE) is depicted in some, but not all of the various historic maps included in this report. It would be helpful to have the APE shown on all of these maps in the final Phase IB/II report.

8. There appears to be an editorial error in the Abstract of Volume I. We met on October 25, 2007, not October 27, 2007. This should be corrected in the final Phase IB/II report.

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In our opinion, comments 1 through 5 above must be addressed and resolved prior to developing a Memorandum of Agreement for this project.

We hope that you will carefully consider these comments in your review of this project. If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900.

Sincerely,

A handwritten signature in black ink, appearing to read "D. McLearn", with a long horizontal flourish extending to the right.

Douglas C. McLearn, Chief
Division of Archaeology & Protection