<table>
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<tr>
<th>Agency</th>
<th>Attention</th>
<th>Street</th>
<th>City State Zip</th>
<th>Telephone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>US Fish and Wildlife Service — Puerto Rico</td>
<td>Office of External Affairs</td>
<td>P.O. Box 491, Road 301 Km 5.1</td>
<td>Boquerón, Puerto Rico</td>
<td>Phone: (787) 851-7297</td>
<td><a href="mailto:jose_cruz-burgos@fws.gov">jose_cruz-burgos@fws.gov</a></td>
</tr>
<tr>
<td>US Environmental Protection Agency, Region 2</td>
<td>Office of Public Affairs</td>
<td>290 Broadway</td>
<td>New York, New York 10007-1866</td>
<td>Phone: (303) 312-6312</td>
<td><a href="mailto:may.jennifer@epa.gov">may.jennifer@epa.gov</a></td>
</tr>
<tr>
<td>US Army Corps of Engineers – Antilles Area Office</td>
<td>Public Affairs Office</td>
<td>400 Fernandez Juncos - Parada 7.5</td>
<td>Puerta de Tierra, Puerto Rico 00901-3299</td>
<td>Phone: (787) 729-6874</td>
<td><a href="mailto:Antilles.AO@usace.army.mil">Antilles.AO@usace.army.mil</a> phone for admin section</td>
</tr>
<tr>
<td>Departmento de Recursos Naturales y Ambientes (Puerto Rico Department of Natural Resources)</td>
<td>Director</td>
<td>P.O. Box 366147</td>
<td>San Juan, Puerto Rico 00936</td>
<td>Phone: (787) 999-2200</td>
<td><a href="mailto:rezelle@hotmail.com">rezelle@hotmail.com</a>, <a href="mailto:eliezernieves@drna.gobierno.pr">eliezernieves@drna.gobierno.pr</a></td>
</tr>
<tr>
<td>Junta de Calidad Ambiental (Puerto Rico Environmental Quality Board)</td>
<td>Director</td>
<td>Urbanización San José Industrial Park, 1375 Avenida Ponce de León</td>
<td>San Juan, Puerto Rico 00926-2604</td>
<td>Phone: (787) 767-8181</td>
<td><a href="mailto:ebaer@eds.pr.gov">ebaer@eds.pr.gov</a></td>
</tr>
<tr>
<td>Departamento de Transportación y Obras Públicas (Puerto Rico Highway and Transportation Authority)</td>
<td>Director (or Access Control Office)</td>
<td>P.O. Box 42007</td>
<td>San Juan, PR 00940-2007</td>
<td>Phone: (787) 721-8787</td>
<td>Deputy Director Ana Del Moral <a href="mailto:adelmoral@dtop.gov.pr">adelmoral@dtop.gov.pr</a></td>
</tr>
<tr>
<td>Puerto Rico State Historic Preservation Office (SHPO)</td>
<td>State Historic Preservation Officer</td>
<td>P.O. Box 9066581</td>
<td>San Juan, Puerto Rico 00906-6581</td>
<td>Phone: (787) 721-3737</td>
<td><a href="mailto:dlopez@prshpo.pr.gov">dlopez@prshpo.pr.gov</a></td>
</tr>
<tr>
<td>Puerto Rico Board of Planning</td>
<td>Director</td>
<td>Governmental Center Robert Sanchez Vilella</td>
<td>Santurce, Puerto Rico 00940-1119</td>
<td>Phone: (787) 725-0355</td>
<td><a href="mailto:comentarios@tip.pr.gov">comentarios@tip.pr.gov</a></td>
</tr>
<tr>
<td>Natural Resources Conservation Service</td>
<td>Morovis Service Center</td>
<td>State Road 6622, Km 0.2 - Sector La Línea</td>
<td>Morovis, Puerto Rico 00687</td>
<td>Phone: (787) 862-2095</td>
<td><a href="mailto:Carmen.Sanchez@pr.usda.gov">Carmen.Sanchez@pr.usda.gov</a></td>
</tr>
<tr>
<td>Morovis Mayor’s Office</td>
<td>The Honorable Heriberto Rodriguez Adorno</td>
<td>Oscar Rodríguez Plaza, Progreso Street</td>
<td>Morovis, Puerto Rico 00687</td>
<td>Phone: (787) 862-2155</td>
<td><a href="mailto:comunicacionesmorovis@gmail.com">comunicacionesmorovis@gmail.com</a></td>
</tr>
<tr>
<td>US Department of Agriculture, Arecibo Service Center</td>
<td>District Conservationist</td>
<td>Caribbean Cinemas Building, Suite 203, 1562 Miramar Ave.</td>
<td>Arecibo, Puerto Rico 00612-2863</td>
<td>Phone: (787) 817-2473</td>
<td><a href="mailto:javier.medina@pr.usda.gov">javier.medina@pr.usda.gov</a></td>
</tr>
<tr>
<td>US Geological Survey, Caribbean Water Science Center</td>
<td>Director</td>
<td>651 Federal Drive, Suite 400-15</td>
<td>Guaynabo, Puerto Rico, 00965</td>
<td>Phone: (787) 749-4346</td>
<td><a href="mailto:pldiaz@usgs.gov">pldiaz@usgs.gov</a> (Pedro A. Diaz)</td>
</tr>
<tr>
<td>Puerto Rico Telephone Company (Claro Puerto Rico)</td>
<td>Director of Commercial Customers, Morovis</td>
<td>1515 F.D. Roosevelt Ave.</td>
<td>Guaynabo, Puerto Rico, 00968</td>
<td>Phone: (787) 781-1314</td>
<td><a href="mailto:rodrigu@usgs.gov">rodrigu@usgs.gov</a> (Rafael W. Rodriguez)</td>
</tr>
<tr>
<td>Federal Office, Municipality of Morovis</td>
<td>Mr. Luis Rivera Carrion, Director</td>
<td>P.O. Box 655</td>
<td>Morovis, Puerto Rico 00687</td>
<td>--</td>
<td><a href="mailto:manolis.colombi@claropr.com">manolis.colombi@claropr.com</a></td>
</tr>
<tr>
<td>Puerto Rico Aqueducts and Sewers Authority (PRASA)</td>
<td>Ms. Lynette Ramirez, PE, Executive Director for Infrastructure</td>
<td>P.O. Box 7066</td>
<td>San Juan, Puerto Rico, 00916-7066</td>
<td>--</td>
<td><a href="mailto:seclmorovis@gmail.com">seclmorovis@gmail.com</a></td>
</tr>
<tr>
<td>Puerto Rico Electric Power Authority (PREPA)</td>
<td>Mr. Rafael Carrera, P.E., Director of Environmental Office</td>
<td>P.O. Box 364267</td>
<td>San Juan, Puerto Rico, 00926-5583</td>
<td>--</td>
<td>Director Efrain Acosta <a href="mailto:efrain.acosta@aceuductospr.com">efrain.acosta@aceuductospr.com</a></td>
</tr>
<tr>
<td>Organización Ciudadanos del Karso</td>
<td>Mr. Abel Vale Nieves, President</td>
<td>PMB 230 267 Sierra Morena Street</td>
<td>San Juan, Puerto Rico, 00926</td>
<td>Phone: (787) 384-4406</td>
<td><a href="mailto:luisfigueroa@asepr.com">luisfigueroa@asepr.com</a>, <a href="mailto:ciudadanosdelkarso@gmail.com">ciudadanosdelkarso@gmail.com</a> &amp; <a href="mailto:info@cdk-pr.org">info@cdk-pr.org</a></td>
</tr>
<tr>
<td>Puerto Rico Department of Education</td>
<td>Director of Morovis School District</td>
<td>Calle Teniente César Luis González</td>
<td>San Juan, Puerto Rico, 00927</td>
<td>Phone: (787) 759-2000</td>
<td><a href="mailto:donaldsbc@de.gobierno.com">donaldsbc@de.gobierno.com</a></td>
</tr>
</tbody>
</table>
July 19, 2016

US Fish and Wildlife Service – Puerto Rico Ecological Services Office
Attn: Office of External Affairs
P.O. Box 491, Road 301 Km 5.1
Boquerón, Puerto Rico

The U.S. Department of Veterans Affairs (VA) is conducting a Site-Specific Environmental Assessment (SEA) as required by the National Environmental Policy Act (NEPA) to evaluate potential environmental impacts of the VA’s Proposed Action, which is to construct and operate the proposed new Puerto Rico National Cemetery Annex in Morovis, Puerto Rico. The VA would like to invite your organization to participate with VA in our evaluation, an important program activity that may be of continued interest to you. Your organization was contacted during the development of the Programmatic Environmental Assessment (PEA) for this project because your agency has either jurisdiction over the project or special expertise in respect to environmental issues related to the project. The PEA was finalized on August 22, 2011, with a Finding of No Significant Impact (FONSI). As described in the PEA, the VA is entering the next stage of the project, which involves holding a public scoping meeting and preparing a Draft SEA document based on site-specific design plans for subsequent public review.

As we begin preparing the Draft SEA, please let us know if your organization has any new information available that would assist the VA in the evaluation of the project, or if additional consultation is requested. Please review this request and RSVP within 30 days of receipt. Comments from your organization will be considered and documented in the Draft SEA.

Additionally, the VA invites your organization to attend the upcoming public scoping meeting at the Morovis Town Hall from 6-8 PM on Tuesday, July 26, 2016. The purpose of the public scoping meeting is to provide the public with an opportunity to learn about the Proposed Action, view preliminary design plans, and comment on potential environmental issues pertaining to the Proposed Action. Public comments received during the meeting will be considered in the Draft SEA. Prior to the meeting, the VA will publish a meeting announcement in Primera Hora and on the VA website inviting the public to attend.

Once the Draft SEA is complete and becomes available for a 30-day public comment period, your organization will be notified again and provided an opportunity to provide comments on that document. The VA will consider and document those comments and responses in the subsequent Final SEA.

VA wishes to take every opportunity to work together in a relationship where a Federal, State or local agency has decision-making authority or special expertise that can enhance VA’s decision making efforts. Once again, if you would like to provide comments or request additional information, please contact Mr. Glenn Elliott, U.S. Department of Veterans Affairs, Office of Construction & Facilities Management, 425 I (eye) Street, NW, Room 6W417a, Washington, D.C., 20001, or send via email to glenn.elliott@va.gov, or by telephone at (202) 632-5879.

Sincerely,

Glenn Elliott
Environmental Engineer
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management
Dear Mr. Elliott:

A July 21 email sent to Jennifer May regarding the proposed cemetery annex in PR was forwarded to me. I oversee the NEPA program for Region 2. I am unable to attend the public meeting for this project; however, please send me any documentation you would like EPA to review. Feel free to send it electronically to Musumeci.grace@epa.gov or in hard copy or CD to the address below.

If you have any questions, please let me know.
Thank you,
Grace

Grace Musumeci, Chief
Environmental Review Section
USEPA Region 2
290 Broadway
New York, NY 10007-1866
212-637-3738
musumeci.grace@epa.gov
July 22, 2016

Department of Veteran Affairs
Attn: Glenn Elliott
Office of Construction and Facilities Management
Washington, DC 20420

Dear Mr. Elliott

We received your information request for the availability of new information regarding the Draft Site-Specific Environmental Assessment (SEA) for the proposed new Puerto Rico National Cemetery Annex in Morovis, Puerto Rico, as required by the National Environmental Policy Act (NEPA), which would assist the Veterans Administration (VA) in the evaluation of the project.

The project site in Morovis is located within the karst region of Puerto Rico. The Legislature of Puerto Rico, in recognition of the importance of the karst region and its values and functions, enacted on August 21, 1999 Act No. 292, known as the “Act for the Protection and Preservation of Puerto Rico’s Karst Region.”1 Through this Act the Legislature established that the Public Policy of the Commonwealth of Puerto Rico is to protect, preserve and manage, for the benefit of present and future generations, the karst region of Puerto Rico. The Act instructs the Puerto Rico Department of Natural and Environmental Resources (DNER) to delimit the Karst Region of Puerto Rico and to establish areas within this region that, due to their environmental significance, can never be used for any commercial purposes. This Act also prohibits any activity within the Karst Region without the express authorization of the DNER.

In October 18, 2002 a group of citizens filed in the Court of First Instance of San Juan a Writ of Mandamus against the DNER, the Puerto Rico Planning Board and the Regulation and Permits Administration arguing that these government agencies had not fulfilled the Legislative mandate of Act No. 292. After a lengthy judicial process, on January 30, 2009 the Court ruled that the Planning Board has to include in its Zoning Regulations the Karst Region Study prepared by the DNER as required by Act No. 292. This ruling was modified during the appeals process, when the Court of Appeals ruled on August 25, 2009 that the Planning Board and the Regulation and Permits Administration must abstain from authorizing any project or issuing any permit within the karst region without previous authorization by the DNER, as required by Act. No. 292.

1 Act No. 292 is available online at http://www.oslpr.org/download/en/1999/0292.pdf
As stated before, any project within the karst region of Puerto Rico requires previous authorization by the DNER. Without this authorization, the Planning Board cannot authorize a project within this region, as required by Act No. 292 and determined by the Court of Appeals.

Please do not hesitate to contact us if you require additional information.

Cordially yours,

Pedro M. Cardona-Roig
Acting Chairman
Puerto Rico Planning Board

Cc. Mr. Nelson J. Santiago Marrero, Secretary, DNER
Dear Mr. Elliot

In response to your request, attached please find a position statement from the Puerto Rico Planning Board regarding the Draft Site-Specific Environmental Assessment (SEA) for the proposed new Puerto Rico National Cemetery Annex in Morovis, Puerto Rico.

Sincerely,

Marlyn Torres Arroyo
Secretaria Confidencial

---

From: Marlyn A. Torres Arroyo
To: gwenn.elliott@va.gov
Cc: Glucksman Andrew, netboyer@drn.gov, Luis Garcia Pelatti, Pedro M Cardona Roig
Subject: Puerto Rico National Cemetery Annex In Morovis, Puerto Rico.
Date: Friday, July 22, 2016 5:31:57 PM
Attachments: 1mage001.png
1mage002.png
1mage003.png
1mage004.png
1mage005.png
201607221725502040.pdf
Importance: High
AUTORIZACIÓN EN LA FISIOGRAFÍA CÁRSICA, ÁREA RESTRINGIDA
DEL CARSO Y SU ZONA DE AMORTIGUAMIENTO

Estados Unidos de América/
Representado por Administración de Veteranos
425 I Street NW.
Washington, DC 20001
O-NP-AKR01-SJ-00356-19012016
Cementerio Nacional de Puerto Rico
Carretera PR-137, Km 11.10
Bo. Fránquez, Morovis

La Ley Núm. 292 de 21 de agosto de 1999, mejor conocida como la Ley para la Protección de la Fisiografía Cársica de Puerto Rico establece que el Departamento de Recursos Naturales y Ambientales (DRNA) deberá delimitar en la Zona Cársica de Puerto Rico las áreas, que debido a su importancia y función geológica, hidrológica y ecosistémica, no pueden ser utilizadas bajo ningún concepto para la extracción de los materiales de la corteza terrestre con propósitos comerciales, ni para explotaciones comerciales. Además, ofrecerá alternativas para que las actividades antes señaladas puedan llevarse a cabo bajo las condiciones apropiadas en otras áreas de la zona cársica. De igual modo dicha Ley prohíbe el que se lleven a cabo actividades en el Área Restringida del Carso sin la correspondiente autorización del DRNA.

El DRNA evaluó la Solicitud para la Autorización de Actividades en la Fisiografía Cársica, el Área Restringida del Carso y su Zona de Amortiguamiento. La misma fue evaluada de acuerdo con las disposiciones de la Ley 292, supra, y con las disposiciones del Plan y Reglamento del Área de Planificación Especial del Carso (PRAPEC).

Se propone la ubicación del Nuevo Cementerio Nacional en un predio de 254.82 cuerdas (247.49 acres), de las cuales se proponen desarrollar 124 acres, quedando un remanente en su estado natural de 114 acres más 9 acres a dedicarse a la conservación ubicados dentro de la huella de impacto del proyecto. La ubicación del predio fue analizada utilizando la Delimitación del Área de Planificación Especial Zona Cársica y el Área de Planificación Especial Restringida del Carso, según consta en el PRAPEC.

De acuerdo a la ubicación presentada, el predio donde se propone realizar el proyecto está dentro de Área Restringida del Carso. A tales efectos, le es de aplicabilidad las disposiciones de la Ley 292, supra, para los proyectos y/o desarrollos en esta zona. Luego de un análisis de la propuesta y la situación de hechos, el DRNA autoriza a las agencias reguladoras a continuar con la evaluación de la solicitud para la ubicación del Nuevo Cementerio Nacional, siempre y cuando, el concesionario cumpla con las leyes y reglamentos para esa actividad. Además, deberá cumplir con las siguientes condiciones:

1. El movimiento de tierra será el mínimo necesario para realizar la actividad.
2. El remanente de la propiedad (114 acres) permanecerá en su estado natural y libre de cualquier estructura.
3. El Concesionario mantendrá en su estado natural y libre de cualquier construcción los 9 acres de terreno que ubican dentro de la huella de impacto del proyecto.
4. El Concesionario mitigará a razón 1:1 por el impacto del proyecto sobre 107 acres. Además, mitigará a razón de 3:1 por el impacto del proyecto a 17 acres de zanjones presentes en el área correspondientes a 51 acres para una mitigación total de 158 acres.

5. El Concesionario iniciará, en un término de 45 días, el trámite para el establecimiento de una Servidumbre de Conservación a Perpetuidad a favor del DRNA en los 114 acres correspondientes al remanente de la finca. El trámite se regirá por el Reglamento para la Adquisición de Bienes Inmuebles y Derechos Reales del Departamento de Recursos Naturales y Ambientales de 5 de diciembre de 2008.

6. El Concesionario donará al DRNA la cantidad de $140,000.00 equivalentes al impacto de 35 acres para los cuales no ha mitigado mediante el mecanismo de la Servidumbre de Conservación a Perpetuidad, ni de conservación de terrenos. El valor por cuerda se ha estimado en $4,000.00, proveniente de una tasación de terrenos aledaños al predio bajo evaluación.


Esta Autorización no constituye un permiso para realizar la actividad.

Se APERCIBE que por virtud de la sección 5.4 de la Ley Núm. 170 de 12 de agosto de 1988, según enmendada, toda persona adversamente afectada por la otorgación, denegatoria o revocación de una licencia, franquicia, permiso, endoso, autorización o gestión similar, tendrá dentro de un término de veinte (20) días contados a partir de la notificación de la determinación, derecho a solicitar la impugnación de dicha determinación por medio de un procedimiento de VISTA ADJUDICATIVA, el cual se iniciará con la presentación de un escrito de impugnación presentado en la Oficina de Secretaría del Departamento o dirigido al Secretario y el cual se regirá por las secciones 3.1 a la 3.18 de la Ley Núm. 170, supra, y por las disposiciones aplicables del Reglamento de Procedimientos Adjudicativos del Departamento de Recursos Naturales y Ambientales.

Carmen R. Guerrero Pérez
Secretaria
Dear Mr. Elliott:

Reference is made to your request for a preliminary jurisdictional determination (preliminary JD) dated November 19, 2015. Based on information submitted to the U.S. Army Corps of Engineers (Corps), we have indicated the approximate location(s) of waters of the United States and wetlands similar to the ones specified in your Wetland Delineation Report on your 247 acre parcel at 137 Km. 11, Morovis, Puerto Rico. Two copies of the preliminary JD form in support of our preliminary JD are enclosed. Please carefully read the preliminary JD form, then sign and return one of the copies to us at the letterhead address within 30 days from the date of this letter.

Please be advised that a Department of the Army permit will be required for work in all areas which there may be in waters of the United States, as indicated in this preliminary JD. For purposes of computation of impacts, compensatory mitigation requirements, and other resource protection measures, a permit decision made on the basis of a preliminary JD will treat all waters and wetlands, which would be affected in any way by the permitted activity on the site, as if they are jurisdictional waters of the United States.

Should you desire an official Corps determination that jurisdictional “waters of the United States,” or “navigable waters of the United States,” or both, are either present or absent on a particular site, the Corps will issue an approved JD when requested.

You are cautioned that work performed in areas which may be waters of the United States, as indicated in the preliminary JD, without a Department of the Army permit could subject you to enforcement action. Receipt of a permit from other federal or local agencies does not obviate the requirement for obtaining a Department of the Army permit for such work prior to commencing work.

This preliminary JD has been conducted to identify the potential for Clean Water Act and/or Rivers and Harbors Act jurisdiction for the particular site identified in this request. This preliminary JD may not be valid for the wetland conservation provisions of the Food Security Act of 1985, as amended. If you or your tenant are U.S. Department of Agriculture (USDA) program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service prior to starting work.
The Corps’ Jacksonville District Regulatory Division is committed to improving service to our customers. We strive to perform our duty in a friendly and timely manner while working to preserve our environment. We invite you to take a few minutes to visit http://corpsmapu.usace.army.mil/cm apex/f?p=regulatory_survey and complete our automated Customer Service Survey. Your input is appreciated favorable or otherwise.

Thank you for your cooperation with our permit program. If you have any questions concerning this matter please contact Johann M. Sasso by mail at the letterhead address, by electronic mail at johann.m.sasso@usace.army.mil, or by telephone at 787-729-6860.

Sincerely,

CASTILLO.SINDU
LFO.1182884851

for Donald W. Kinard
Chief, Regulatory Division

Enclosures

Copy Furnished: (w/o encls)
Jose Rodriguez, AECOM, 500 Tanca St. Ochoa Bldg. Suite 401, San Juan, PR 00901
Andrew Glucksman, Mabbett & Associates, Inc., 5 Alfred Circle, Bedford, MA 01730
ATTACHMENT

PRELIMINARY JURISDICTIONAL DETERMINATION FORM

BACKGROUND INFORMATION

A. REPORT COMPLETION DATE FOR PRELIMINARY JURISDICTIONAL DETERMINATION (JD): March 03, 2016

B. NAME AND ADDRESS OF PERSON REQUESTING PRELIMINARY JD:
Glenn Elliott
US Dept. of Veterans Affairs
Office of Construction and Facilities Management (003 C4B)
425 I Street, NW
Washington, DC 20001

C. DISTRICT OFFICE, FILE NAME, AND NUMBER: CESAJ-DS-RD, VA JD Review, Morovis, PR, SAJ-2016-00272 (JD-JMS)

D. PROJECT LOCATION(S) AND BACKGROUND INFORMATION: Project site is located at 137 Km. 11
(USE THE ATTACHED TABLE TO DOCUMENT MULTIPLE WATERBODIES AT DIFFERENT SITES)
State: Puerto Rico  County/parish/borough: Morovis
Center coordinates of site (lat/long in degree decimal format): Lat. 18.35689° N, Long. -66.43226° W.
Universal Transverse Mercator:
Name of nearest waterbody: Franquez Creek and unnamed Creek and 0.05 acres

Identify (estimate) amount of waters in the review area:
Non-wetland waters: 5400 linear feet: 20 width (ft) and/or acres. Cowardin Class: Riverine Stream Flow: Intermittent Wetlands: 0.05 acres. Cowardin Class:

Name of any water bodies on the site that have been identified as Section 10 waters:
Tidal:
Non-Tidal:

E. REVIEW PERFORMED FOR SITE EVALUATION (CHECK ALL THAT APPLY):
☑ Office (Desk) Determination. Date: March 2, 2016
☐ Field Determination. Date(s):
1. The Corps of Engineers believes that there may be jurisdictional waters of the United States on the subject site, and the permit applicant or other affected party who requested this preliminary JD is hereby advised of his or her option to request and obtain an approved jurisdictional determination (JD) for that site. Nevertheless, the permit applicant or other person who requested this preliminary JD has declined to exercise the option to obtain an approved JD in this instance and at this time.

2. In any circumstance where a permit applicant obtains an individual permit, or a Nationwide General Permit (NWP) or other general permit verification requiring “pre-construction notification” (PCN), or requests verification for a non-reporting NWP or other general permit, and the permit applicant has not requested an approved JD for the activity, the permit applicant is hereby made aware of the following: (1) the permit applicant has elected to seek a permit authorization based on a preliminary JD, which does not make an official determination of jurisdictional waters; (2) that the applicant has the option to request an approved JD before accepting the terms and conditions of the permit authorization, and that basing a permit authorization on an approved JD could possibly result in less compensatory mitigation being required or different special conditions; (3) that the applicant has the right to request an individual permit rather than accepting the terms and conditions of the NWP or other general permit authorization; (4) that the applicant can accept a permit authorization and thereby agree to comply with all the terms and conditions of that permit, including whatever mitigation requirements the Corps has determined to be necessary; (5) that undertaking any activity in reliance upon the subject permit authorization without requesting an approved JD constitutes the applicant's acceptance of the use of the preliminary JD, but that either form of JD will be processed as soon as is practicable; (6) accepting a permit authorization (e.g., signing a proffered individual permit) or undertaking any activity in reliance on any form of Corps permit authorization based on a preliminary JD constitutes agreement that all wetlands and other water bodies on the site affected in any way by that activity are jurisdictional waters of the United States, and precludes any challenge to such jurisdiction in any administrative or judicial compliance or enforcement action, or in any administrative appeal or in any Federal court; and (7) whether the applicant elects to use either an approved JD or a preliminary JD, that JD will be processed as soon as is practicable. Further, an approved JD, a proffered individual permit (and all terms and conditions contained therein), or individual permit denial can be administratively appealed pursuant to 33 C.F.R. Part 331, and that in any administrative appeal, jurisdictional issues can be raised (see 33 C.F.R. 331.5(a)(2)). If, during that administrative appeal, it becomes necessary to make an official determination whether CWA jurisdiction exists over a site, or to provide an official delineation of jurisdictional waters on the site, the Corps will provide an approved JD to accomplish that result, as soon as is practicable.

This preliminary JD finds that there "may be" waters of the United States on the subject project site, and identifies all aquatic features on the site that could be affected by the proposed activity, based on the following information:
SUPPORTING DATA. Data reviewed for preliminary JD (check all that apply)
- checked items should be included in case file and, where checked and requested, appropriately reference sources below):
☒ Maps, plans, plots or plat submitted by or on behalf of the applicant/consultant:
☐ Data sheets prepared/submitted by or on behalf of the applicant/consultant.
☐ Office concurs with data sheets/delineation report.
☐ Office does not concur with data sheets/delineation report.
☐ Data sheets prepared by the Corps:
☐ Corps navigable waters' study:
☐ USGS NHD data.
☒ USGS 8 and 12 digit HUC maps.
☐ U.S. Geological Survey map(s). Cite scale & quad name:
☐ USDA Natural Resources Conservation Service Soil Survey.
Citation:
☒ National wetlands inventory map(s). Cite name:USFWS-VA Morovis.
☐ State/Local wetland inventory map(s):
☐ FEMA/FIRM maps:
☐ 100-year Floodplain Elevation is: (National Geodetic Vertical Datum of 1929)
☒ Photographs: ☒ Aerial (Name & Date):11/12/995.
or ☒ Other (Name & Date):7/14/2015.
☐ Previous determination(s). File no. and date of response letter:
☐ Other information (please specify):

IMPORTANT NOTE: The information recorded on this form has not necessarily been verified by the Corps and should not be relied upon for later jurisdictional determinations.

Signature and date of person requesting preliminary JD (REQUIRED, unless obtaining the signature is impracticable)
### U.S. Department of Agriculture

**FARMLAND CONVERSION IMPACT RATING**

**PART I** *(To be completed by Federal Agency)*

<table>
<thead>
<tr>
<th>Name of Project</th>
<th>Proposed Land Use</th>
<th>Federal Agency Involved</th>
<th>County and State</th>
</tr>
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<tbody>
<tr>
<td>Puerto Rico National Cemetery Replacement</td>
<td>National Cemetery</td>
<td>Department of Veterans Affairs</td>
<td>Morovis, Puerto Rico</td>
</tr>
</tbody>
</table>

**PART II** *(To be completed by NRCS)*

<table>
<thead>
<tr>
<th>Date Request Received By NRCS</th>
<th>Person Completing Form</th>
<th>Average Farm Size</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>A. Glucksman (Mabbett)</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Does the site contain Prime, Unique, Statewide or Local Important Farmland?</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>(If no, the FPPA does not apply - do not complete additional parts of this form)</em></td>
<td></td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Farmable Land In Govt. Jurisdiction</th>
<th>Amount of Farmland As Defined in FPPA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acres: %</td>
<td>Acres: %</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Date Land Evaluation Returned by NRCS</th>
<th>Alternative Site Rating</th>
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<tr>
<td></td>
<td>Site A</td>
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**PART III** *(To be completed by Federal Agency)*

<table>
<thead>
<tr>
<th>A. Total Acres To Be Converted Directly</th>
<th>B. Total Acres To BeConverted Indirectly</th>
<th>C. Total Acres In Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>12</td>
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<td>247.5</td>
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**PART IV** *(To be completed by NRCS)*

**Land Evaluation Information**

<table>
<thead>
<tr>
<th>A. Total Acres Prime And Unique Farmland</th>
<th>B. Total Acres Statewide Important or Local Important Farmland</th>
<th>C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted</th>
<th>D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value</th>
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**PART V** *(To be completed by NRCS)*

**Land Evaluation Criterion**

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<th>Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)</th>
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<td>Maximum Points</td>
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<tr>
<td>-----------------</td>
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<tr>
<td>Site A</td>
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**PART VI** *(To be completed by Federal Agency)*

**Site Assessment Criteria** *(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)*

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<thead>
<tr>
<th>Site</th>
<th>Points</th>
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<tr>
<td>Site A</td>
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</tr>
<tr>
<td>Site B</td>
<td>45</td>
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<tr>
<td>Site C</td>
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</tr>
<tr>
<td>Site D</td>
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**PART VII** *(To be completed by Federal Agency)*

**Relative Value Of Farmland (From Part V)**

<table>
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<th>Relative Value Of Farmland (From Part V)</th>
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<td>100</td>
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</table>

**Total Site Assessment (From Part VI above or local site assessment)**

<table>
<thead>
<tr>
<th>Total Site Assessment (From Part VI above or local site assessment)</th>
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</thead>
<tbody>
<tr>
<td>160</td>
</tr>
</tbody>
</table>

**TOTAL POINTS (Total of above 2 lines)**

<table>
<thead>
<tr>
<th>TOTAL POINTS (Total of above 2 lines)</th>
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</thead>
<tbody>
<tr>
<td>260</td>
</tr>
</tbody>
</table>

**Was A Local Site Assessment Used?**

<table>
<thead>
<tr>
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<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>✓</td>
</tr>
</tbody>
</table>

**Site Selected:** Morovis, PR

**Date Of Selection:** October 2016

**Reason For Selection:**

The design for the Phase 1 cemetery at this site causes the least amount of impacts to the environment.

**Name of Federal agency representative completing this form:** U.S. Dept. Veterans Affairs

**Date:** 2/1/2017

*(See instructions on reverse side)*

Form AD-1006 (03-02)
STEPS IN THE PROCESSING THE FARMLAND AND CONVERSION IMPACT RATING FORM

Step 1 - Federal agencies (or Federally funded projects) involved in proposed projects that may convert farmland, as defined in the Farmland Protection Policy Act (FPPA) to nonagricultural uses, will initially complete Parts I and III of the form. For Corridor type projects, the Federal agency shall use form NRCS-CPA-106 in place of form AD-1006. The Land Evaluation and Site Assessment (LESA) process may also be accessed by visiting the FPPA website, http://fppa.nrcs.usda.gov/lesa/.

Step 2 - Originator (Federal Agency) will send one original copy of the form together with appropriate scaled maps indicating location(s) of project site(s), to the Natural Resources Conservation Service (NRCS) local Field Office or USDA Service Center and retain a copy for their files. (NRCS has offices in most counties in the U.S. The USDA Office Information Locator may be found at http://offices.usda.gov/scripts/ndISAPI.dll/oip_public/USA_map, or the offices can usually be found in the Phone Book under U.S. Government, Department of Agriculture. A list of field offices is available from the NRCS State Conservationist and State Office in each State.)

Step 3 - NRCS will, within 10 working days after receipt of the completed form, make a determination as to whether the site(s) of the proposed project contains prime, unique, statewide or local important farmland. (When a site visit or land evaluation system design is needed, NRCS will respond within 30 working days.

Step 4 - For sites where farmland covered by the FPPA will be converted by the proposed project, NRCS will complete Parts II, IV and V of the form.

Step 5 - NRCS will return the original copy of the form to the Federal agency involved in the project, and retain a file copy for NRCS records.

Step 6 - The Federal agency involved in the proposed project will complete Parts VI and VII of the form and return the form with the final selected site to the servicing NRCS office.

Step 7 - The Federal agency providing financial or technical assistance to the proposed project will make a determination as to whether the proposed conversion is consistent with the FPPA.

INSTRUCTIONS FOR COMPLETING THE FARMLAND CONVERSION IMPACT RATING FORM
(For Federal Agency)

Part I: When completing the "County and State" questions, list all the local governments that are responsible for local land use controls where site(s) are to be evaluated.

Part III: When completing item B (Total Acres To Be Converted Indirectly), include the following:

1. Acres not being directly converted but that would no longer be capable of being farmed after the conversion, because the conversion would restrict access to them or other major change in the ability to use the land for agriculture.

2. Acres planned to receive services from an infrastructure project as indicated in the project justification (e.g. highways, utilities planned build out capacity) that will cause a direct conversion.

Part VI: Do not complete Part VI using the standard format if a State or Local site assessment is used. With local and NRCS assistance, use the local Land Evaluation and Site Assessment (LESA).

1. Assign the maximum points for each site assessment criterion as shown in § 658.5(b) of CFR. In cases of corridor-type project such as transportation, power line and flood control, criteria #5 and #6 will not apply and will, be weighted zero, however, criterion #8 will be weighed a maximum of 25 points and criterion #11 a maximum of 25 points.

2. Federal agencies may assign relative weights among the 12 site assessment criteria other than those shown on the FPPA rule after submitting individual agency FPPA policy for review and comment to NRCS. In all cases where other weights are assigned, relative adjustments must be made to maintain the maximum total points at 160. For project sites where the total points equal or exceed 160, consider alternative actions, as appropriate, that could reduce adverse impacts (e.g. Alternative Sites, Modifications or Mitigation).

Part VII: In computing the "Total Site Assessment Points" where a State or local site assessment is used and the total maximum number of points is other than 160, convert the site assessment points to a base of 160.

Example: if the Site Assessment maximum is 200 points, and the alternative Site "A" is rated 180 points:

| Total points assigned Site A | Maximum points possible | = 180 / 200 X 160 = 144 points for Site A |

For assistance in completing this form or FPPA process, contact the local NRCS Field Office or USDA Service Center.

NRCS employees, consult the FPPA Manual and/or policy for additional instructions to complete the AD-1006 form.
December 3, 2015

Ms. Diana López Sotomayor, SHPO  
State Historic Preservation Office  
P.O. Box 9023935  
San Juan, PR 00902-3935

RE: Submittal - Phase II Cultural Resource Investigation Work Plan  
Proposed Puerto Rico National Cemetery Annex  
Morovis, Puerto Rico

Dear Ms. Sotomayor:

The U.S. Department of Veterans Affairs (VA) is proposing to construct and operate the Puerto Rico National Cemetery Annex in the Fránquez and Barahona ward in Morovis, Puerto Rico. The project site comprises approximately 247 acres and is located at PR-137 Km 11 in Morovis.

We are pleased to submit the attached Phase II Cultural Resource Investigation Work Plan (Work Plan) at four sites in the proposed National Cemetery Annex project area. Based upon consultation with you and your staff, the Work Plan describes the proposed methods of investigation for four separate cultural resource sites: Quebrada Franquez 1 (MR0100012), which is a horizontally discrete Pre Columbian site; Quebrada Franquez 2 (MR0100013), a multicomponent site that includes both historic period and Pre Columbian materials; Cueva de la Moca (MR0100010), a Pre Columbian site containing ceramics that appear to date to the Ostiones Culture as well as a possible human burial; and Las Cruces de Catalina (MR0100011), a historic petroglyph site. Each of these sites was discussed in our teleconference with your staff on August 13, 2015, in which it was concurred that we would develop this draft plan for consideration by your office. The proposed plans of investigations were developed by R. Christopher Goodwin & Associates, Inc., under the direction of Dr. Dave Davis, Senior Vice President, and Ms. Suzanne Sanders, Senior Project Manager.

At the present time, the Veteran’s Administration does not intend to disturb the cave of Cueva de la Moca or its immediately surrounding area. We would therefore appreciate your counsel concerning our obligations toward that site if it is not to be disturbed.

We believe that the Work Plan that we have developed satisfies all federal requirements as well as the standards and expectations of your office. We greatly appreciate your prompt evaluation and look forward to receiving your comments and guidance about the proposed Work Plan. If any additional information is needed feel free to contact me via phone at 202.632.5879 or via email at Glenn.Elliott@va.gov at your convenience.

We appreciate your assistance with the planning of this project.

Sincerely,

Glenn Elliott  
Environmental Engineer

Attachment: Phase II Cultural Resource Investigation Work Plan

cc: Andrew Glucksman, Mabbett & Associates, Inc.  
Dr. Dave Davis, R.C. Goodwin & Associates, Inc.
January 7, 2016

Mr. Glenn Elliott, Environmental Engineer P P/M
Office of Construction & Facilities Management
US Department of Veterans Affairs
425 I (eye) Street, NW, Room 6W417a
Washington, D.C. 20001

SHPO: 04-08-10-02 INTENSIVE ARCHAEOLOGICAL SURVEY (STAGE II)
WORK PLAN, PROPOSED NATIONAL CEMETERY, DEPARTMENT OF
VETERANS AFFAIRS, PR-137, MOROVIS, PUERTO RICO

Dear Mr. Elliott:

We acknowledge the receipt of an intensive archaeological survey work plan (Stage II) dated November 2015 related to the above referenced project. This work plan was requested by our Office on letter dated October 22, 2015. We have some comments and recommendations for your consideration.

Please, be advised that information related to above-surface features (i. e., buildings, structures) within the proposed project area should be included in the work plan, as stated in previous letter dated October 22, 2015.

Please bear in mind that archeological testing for evaluation should not proceed beyond the point of providing the information necessary for evaluation and should not unnecessarily affect significant features or values of the property; therefore, we believe shovel testing at a 5.00 meter interval in the immediate surroundings of Quebrada Franquez 1, Quebrada Franquez 2 and Cruces de Catalina archaeological sites seems too close.

The results obtained from Stage I survey should be used to efficiently locate the excavation of 1.00 m x 1.00 m archaeological units in Quebrada Franquez 1 and Quebrada Franquez 2 archaeological sites according to research objectives. Considering the area estimated for each archaeological site, number of units to be performed at Quebrada Franquez 1 should be between 2 and 4 and for Quebrada Franquez 2, between 6 and 8. Regarding the area surrounding the Cruces de Catalina archaeological site, subsurface testing at a 20 meter interval until reaching two negative results should be adequate; retesting at 10 m between last positive and first negative tests is recommended. The work plan should also specify excavation method(s) (i. e., manual or mechanical).
Mr. Elliott
January 7, 2016
Page 2

SHPO: 04-08-10-02 INTENSIVE ARCHAEOLOGICAL SURVEY (STAGE II) WORK PLAN, PROPOSED NATIONAL CEMETERY, DEPARTMENT OF VETERANS AFFAIRS, PR-137, MOROVIS, PUERTO RICO

Please include in the document, a scale map and/or aerial photograph with subsurface testing strategy (i.e., shovel tests and archaeological excavation units) graphically depicted.

As soon as we receive the revised intensive archaeological survey work plan, we will continue with the evaluation of this undertaking. If you have any questions you may contact Archaeologist Marinés Colón, Historic Property Specialist, at (787) 721-3737 or mcolon@prshpo.pr.gov.

Sincerely,

Diana López Sotomayor, Archaeologist
State Historic Preservation Officer

DLS/NAPT/BRS/MC
January 28, 2016

Ms. Diana López Sotomayor, Archaeologist
State Historic Preservation Officer
P.O. Box 9023935
San Juan, PR 00902-3935

RE: Submittal – Revised Phase II Cultural Resource Investigation Work Plan
Proposed Puerto Rico National Cemetery Annex
Morovis, Puerto Rico
SHPO: 04-08-10-02

Dear Ms. Sotomayor:

The U.S. Department of Veterans Affairs (VA) is pleased to provide the Work Pan for Phase II Investigations at the Proposed Puerto Rico National Cemetery Annex, Municipality of Morovis, Puerto Rico, dated January 2016 (Work Plan). This Work Plan addresses the comments provided by your office on January 7, 2016 regarding the draft Work Plan submitted on December 3, 2015.

We greatly appreciate your prompt evaluation and look forward to receiving your comments and guidance about the proposed Work Plan. If any additional information is needed feel free to contact me via phone at 202.632.5879 or via email at Glenn.Elliott@va.gov at your convenience.

We appreciate your assistance with the planning of this project.

Sincerely,

1/28/2016

Glenn Elliott
Environmental Program Manager
Signed by: Glenn M. Elliott 689970

Attachment: Work Pan for Phase II Investigations at the Proposed Puerto Rico National Cemetery Annex, Municipality of Morovis, Puerto Rico, dated January 2016 (1 HD)

cc: Andrew Glucksman, Mabbett & Associates, Inc.
Dr. Dave Davis, R.C. Goodwin & Associates, Inc.
WORK PLAN FOR PHASE II INVESTIGATIONS AT THE PROPOSED PUERTO RICO NATIONAL CEMETERY ANNEX, MUNICIPALITY OF MOROVIS, PUERTO RICO

PREPARED FOR:

MABBETT & ASSOCIATES
10 DORRANCE STREET, SUITE 700
PROVIDENCE, RI 02903

Sensitive Information: Not For Public Distribution

R. CHRISTOPHER GOODWIN & ASSOCIATES, INC.
309 JEFFERSON HIGHWAY, SUITE A • NEW ORLEANS, LA 70121
WORK PLAN FOR PHASE II INVESTIGATIONS AT THE PROPOSED PUERTO RICO
NATIONAL CEMETERY ANNEX, MUNICIPALITY OF MOROVIS, PUERTO RICO

JANUARY 25, 2016

Introduction

This Phase II Work Plan provides a brief summary of the status of cultural resources investigations for the proposed Puerto Rico National Cemetery Annex (the project) in Morovis, Puerto Rico, and offers a discussion of research objectives and proposed methodologies for additional investigations within the project area. Additional prior investigations include Phase II archaeological evaluation of three previously recorded sites within the project area, and supplemental Phase I archeological survey for portions of the planned Area of Potential Effect (APE).

The project property encompasses approximately 101.2 ha (250 ac) located west of PR 137 in the Municipality of Morovis, Puerto Rico. Historically, this property has been used for farming and pasture; it contains an abandoned farm complex that includes a partially demolished house and outbuildings. An archeological investigation in 2006 (Veléz 2006) identified four cultural resources: two open-air archeological sites, a cave site, and historic period petroglyphs composed of two crosses carved into rock outcrops. A Phase I archeological survey completed in 2010 relocated one of the previously recorded open-air sites and documented one additional small open-air site (Barse and Grose 2015) (Figure 1). The current work plan addresses four sites; two open-air sites, one historic period petroglyph, and one cave site.

Quebrada Franquez 1 (MR0100012) is a horizontally discrete Precolombian site. Cultural materials from this site consist of five Precolombian sherds from two shovel tests. Quebrada Franquez 2 (MR0100013) is a slightly larger, multicomponent site that includes both historic period and Precolombian materials. Cueva de la Moca (MR0100010) was identified during a Phase IB survey in 2006 for a proposed housing development (Veléz 2006). During that survey, a bone splinter and possible Precolombian ceramics attributed to the Ostiones Culture were found in situ with a possible human burial at the drip line of Cueva de la Moca. Las Cruces de Catalina (MR0100011), a historic period petroglyph site, was identified previously as crosses carved in stone in the area of Franquez. Local oral history indicates that these crosses were carved in the early twentieth century by a local woman who was possessed by the unavenged spirit of her younger lover who died in prison, falsely accused of a crime (Veléz 2006).

Phase II Site Evaluation

Research Objectives

The proposed Phase II Site Evaluation efforts will focus on collection of data sufficient to permit determinations of eligibility for listing in the National Register of Historic Places (NRHP), and to determine the potential impact of development on these four cultural resource sites. The evaluation of eligibility for the NRHP will apply the National Register Criteria for Evaluation (36 CFR 60.4 [a-d]), which state that in order to be considered eligible, a resource must meet at least one of the following four criteria:

- (a) it must be associated with significant events in the broad patterns of national history;
- (b) it must be associated with the lives of persons significant in our past;
- (c) it must be representative of a type, period, or method of construction, or the work of a master; or
- (d) it must be capable of yielding information about the past (36 CFR 60.4 [a-d]).
In addition, an archaeological resource must exhibit sufficient depositional integrity to afford the opportunity to address important research questions. Evaluation of integrity entails examination of the horizontal and vertical integrity and condition of the site with reference to its ability to provide information concerning activity at the site during its period of significance.

Quebrada Franquez 1 (MR0100012) is a small, horizontally restricted site in the northern portion of the project property (Figure 2). It measures approximately 10 x 20 m (32.8 x 65.6 ft), and it is located on the top of a small landform (Figure 3). A total of five Precolumbian ceramic sherds were found in two shovel tests (Figure 4): three undecorated body sherds and one thick-walled undecorated sherd that may be the base of a cassava griddle. All of the ceramic sherds were <2 cm (0.8 in) in size and were made from a reddish residual clay tempered with sand and grog or sand. Their surfaces were too eroded to determine if they were burnished or possessed a slip. Although none of these small, eroded, fragmentary sherds were diagnostic, their paste and thickness (1.5 – 2 cm) did not conform to expectations for Saladoid, e.g., Hacienda Grande or Cuevas traditions in Puerto Rico. Thus, the impression is that they dated from the Ostionoid or subsequent series. No additional cultural materials were recovered from these shovel tests, and no associated features or deposits were noted. Although this site is small (10 x 20 m; 32.8 x 65.6 ft) and could not be assigned to a specific Precolumbian culture, it appears to have integrity and may offer research potential, especially because there is a dearth of recorded open air sites in the interior uplands of central Puerto Rico.

Proposed testing at Quebrada Franquez 1 (MR0100012) will consist of the excavation of two to four 1 x 1 meter (3.3 x 3.3 ft) excavation units or the equivalent, to examine the stratigraphic sequence and to enable assessment of the integrity of the site. One unit will be situated adjacent to each of the two previous artifact producing shovel tests (Shovel Test N860 E1260, and Shovel Test N850 E1260). The field director will determine whether or not the excavation of a third of fourth unit is warranted, based on the results of testing within the first two units. The final two units could be used to test the area between the previous units, at approximate grid coordinates of N855 E1260, or could be used to expand excavations in the vicinity of either of the first two unit locations.

Quebrada Franquez 2 (MR0100013), which was identified as Site 1 during a Phase IB survey in 2006 (Veléz 2006), is approximately 30 x 30 m (98.4 x 98.4 ft) in size (Figure 5). The location of this site was confirmed during the 2010 survey through the recovery of historic and Precolumbian artifacts from shovel tests located on the end of a finger ridge in the northern portion of the proposed cemetery project area (Figure 6). This site was delineated at 10 m (32.8 ft) intervals using 21 additional tests. The Precolumbian sherds from this site also were very small (<1 cm); their condition was too poor for clear assignation of cultural or temporal associations (Figure 7). Although Veléz (2006) indicated that the prehistoric site likely dated from the Ostionoid period, the Precolumbian ceramics found during the subsequent Phase I investigation did not exhibit traits that could be assigned definitively to a specific cultural period. The small numbers of historic period materials included aqua and dark green bottle glass, pearlware (1795-1815), whiteware (post-1820), and machine cut nail fragments (1815-1890) (Figure 8). These artifacts were attributed to nineteenth century and early twentieth century historic activity. This site appears to have integrity. Soils were deeper and better developed than on other ridge tops, increasing the potential for intact features, especially related to the historic component. The Precolumbian component could add valuable information to knowledge related to interior upland sites in central Puerto Rico.

Proposed testing at Quebrada Franquez 2 (MR0100013) will consist of the excavation of six to eight 1 x 1 meter (3.3 x 3.3 ft) excavation units or the equivalent to examine the stratigraphic sequence and to assess the depositional integrity of the site. Three units will be placed in the vicinity of the three previous shovel tests that produced the largest quantities of cultural materials (Shovel Test N1240 E670, Shovel Test N1240 E690, and Shovel Test N1260 E690). A fourth test unit will be placed in the northern portion of the site, to test in the vicinity of the positive shovel test at N1320 E660, while a fifth unit will be placed in
the vicinity of N1250 E680, to examine the previously untested central portion of the site. A minimum of one and maximum of three additional units will be placed within the site boundaries at locations determined by the field director, either to expand on excavations in the vicinities of any of the first five units, or to test any additional areas that might warrant further investigation.

Cueva de la Moca (MR0100010) is a solution cavern originating at the base of a cliff on the western side of a deep sinkhole in the southern portion of the proposed cemetery property (Figures 9-11). Originally identified during Phase IB testing in 2006 (Veléz 2006), the site was relocated and examined during the 2010 Phase I survey. The Phase IB report indicated the presence of petroglyphs on the interior of the cave and a human burial located at the cave’s drip line (Veléz 2006). During the 2010 Phase I survey, the atypical petroglyphs pictured in the Phase IB report were relocated and appeared to constitute natural flowstone formations. The Phase IB testing did not recover any cultural material from within the cave; no additional shovel testing was conducted within the cave or in the area of the reported human burial during the 2010 Phase I survey. The presence of a possible human burial and associated artifacts indicates integrity (location, setting, feeling, and association). Archeological sites typically possess those qualities of significance as defined by the National Register criteria for Evaluation (36 CFR 60.4 a-d) under Criterion a, for association with events that have contributed to the broad patterns of history or prehistory and/or under Criterion d for their ability to contribute to understanding of history or prehistory, i.e., their “research potential.” In terms of its association (Criterion a), the Cueva de la Moca site is associated with the themes of religion, land use, and burial practices during the Ostionoid period in the central interior portion of Puerto Rico. It also may contribute to the understanding of nearby Precolumbian sites, both previously recorded and as yet unrecorded.

Cueva de la Moca will be outside of the Area of Potential Effect (APE) for cemetery construction, and will be avoided. A 100 ft buffer will be established around this resource to ensure consideration of the site location during design and planning, and avoidance during construction.

Las Cruces de Catalina (MR0100011) were identified previously as crosses carved in stone in the area of Franquez (Figures 12-13). Local tradition indicates that these crosses were carved in the early twentieth century by a local woman said to have been possessed by the unavenged spirit of her younger lover who died in prison, falsely accused of a crime (Veléz 2006). Within the proposed cemetery property, the carvings were found on a single stone Figure 13); they were mapped and located using GPS. This resource also constitutes an archeological site, i.e., a petroglyph, apparently consisting of folk art that may evince a tradition of folk Catholicism during the first two decades of the twentieth century. Martinez in Veléz (2006), indirectly argued that this carving of crosses and others in the area may constitute a Traditional Cultural Property (TCP) related to folk religion of “Jibaros Moroveños,” a local manifestation of Puerto Rico’s interior rural Jibaro culture.

Proposed archeological testing at Las Cruces de Catalina (MR0100011) will include documentation of the petroglyph and the excavation of shovel tests in the area surrounding the rock outcrop to search for any additional activity areas. The first four shovel tests will be placed in each of the four cardinal directions (north, south, east and west) around the rock outcrop, within approximately 5 m (16.5 ft) of the outcrop. Shovel testing will continue at 20 m (65.6 ft) intervals from each of the first four shovel tests until at least two negative shovel tests have been excavated in each direction. One additional shovel test will be placed in each direction at a 10 m (32.8 ft) interval between the last positive and first negative shovel tests, in order to define further the boundaries of the site. It is anticipated that no more than 20 shovel tests would be needed to determine the site boundaries and test for additional activity areas.
Proposed Methods of Investigation

Task 1: Archival Research. For the Precolombian component, the initial impression was that the materials found at three sites, Quebrada Franquez 1, Quebrada Franquez 2 and Cueva de la Moca, reflected activity in the project area related to the Ostionoid or later periods. Research questions for Phase II Investigations will focus on characterizing current knowledge of settlement patterns and land use in interior upland settings during these later periods.

In addition, the area that includes the proposed cemetery site was part of the Taino Yucayeque (Kingdom) of Jatibonico, ruled by the Cacique Orocobix from the vicinity of Aibonito. That cacicazgo included the present-day municipalities of Aibonito, Orocovis, Barranquitas, Morovis and Corozal. The Spanish conquest of Jatibonico in 1513 is well documented in surviving period documents. Subsequent sale at public auction of captured Tainos also is documented, as are the goods handed out to Tainos who were forced to labor in the “demora” system in subsequent years (AGI Contaduria, 1071, ff19-32). For the Precolombian component, research questions seek to ascertain the role of the vicinity of the project area in the context of the Taino Yucayeque.

In the historic period, the Municipality of Morovis has remained largely agricultural with a historic emphasis on tobacco, coffee, sugar, cattle and farming, and a more recent focus on dairy farming and light industry. Archival investigations will seek to develop a clearer context of historic development of the local coffee, sugar, tobacco and cattle industries. In addition, research for Phase II investigations will address 19th and 20th century social and economic contexts of the municipality and project area. Archival research will be conducted at local repositories in San Juan and/or in the Municipality of Morovis.

Task 2: Site Delineation and Mapping. Site delineation will include additional systematic shovel testing to demonstrate the boundaries of each site, and to identify any areas of artifact concentrations. All shovel tests will measure a minimum of 35 cm (13.8 in) in diameter, and will be excavated to a minimum depth of 10 cm (3.9 in) into culturally sterile subsoil, following natural stratigraphy. All soils will be screened through ¼ in hardware mesh. All shovel test data will be recorded on standardized forms that include the location of each test, the significant aspects of the natural or cultural landscape, and the presence or absence and nature of previous disturbances and of any cultural features. Documentation of all shovel test areas will include detailed field notes, photo-recordation of survey areas and identified sites, and locational data sufficient to map all shovel test locations and identified site locations. A Trimble GPS unit with mapping grade/sub-meter accuracy will be used to record the archeological site boundaries in order to prepare shape files (.shp).

Task 3: Unit Excavation. All test units will measure a minimum of 1 x 1 m (3.3 x 3.3 ft) and will be excavated in 10 cm (3.9 in) arbitrary levels within natural strata. These tests will terminate a minimum of 10 cm (3.9 in) into subsoil. As with the shovel tests, all soils will be screened through ¼ inch or smaller hardware mesh, and all pre-modern cultural materials will be collected. Standard recordation for these units will include the completion of forms documenting soil characteristics and the presence or absence of cultural features or deposits; the execution of hand-drawn plans and profiles for at least one wall of each unit; and photographic documentation of all units and features.

Task 4: Laboratory Processing. All artifacts will be bagged in the field by provenience. The materials then will be cleaned, inventoried, packaged, and prepared for curation and delivery to a federally-approved curation facility. All artifacts will be cleaned and processed as appropriate for each artifact type and condition. All cultural materials will be subject to analysis and inventory using standard software computer-based programs. For the inventory, each entry will include the material class, the artifact type, functional category, and site and provenience designations. The resulting artifact catalog will include artifact attribute data, artifact counts, comments, and manufacture date range information. All documentation, pro-
cessing and analysis will be conducted following federal and Puerto Rico guidelines, and all artifacts will be prepared for eventual curation.

Task 5: Reporting
Upon completion of field investigations, laboratory processing, and data analysis, a draft technical report will be prepared that describes the findings of the Phase II evaluations and that provides management recommendations based on those findings. The report will review the findings of the archeological evaluation, and discuss any identified cultural resources and the potential impacts to them. Management recommendations will be made for each cultural resource. If the evaluated sites meet the criteria for National Register eligibility (36 CFR 60.4[a-d]), the recommendations may include development of avoidance protocols, treatment plans or mitigation strategies, as appropriate. Following review by the VA and the Puerto Rico SHPO, within 30 days of receipt of comments, a final report will be prepared that addresses review agency comments.

Treatment of Human Remains

Any human skeletal remains, regardless of antiquity or ethnic origin, at all times will be treated with dignity and respect. If human remains are encountered during the course of investigation, all excavation in the vicinity of the discovery will stop, and the location will be immediately secured and protected from damage or disturbance. Human remains will be left in situ pending consultation with the VA and the Puerto Rico SHPO, concerned parties, and appropriate Commonwealth and federal agencies.

The Project Manager will immediately notify the Municipality, the VA, and the Puerto Rico SHPO. The VA will consult with the Puerto Rico SHPO and appropriate consulting parties concerning the treatment of human remains.

Phase I Archeological Survey

Phase I archeological survey was conducted for the entire cemetery property in 2010 (Barse and Grose 2015). For that survey, the property was divided into high, moderate and low probability areas for intact resources (Figure 14). That determination was based on several factors including soil type, topography, proximity to permanent water sources, and the locations of previously identified sites in the project area. The areas with rocky, poorly developed soils and steep topography found in the southern portion of the project area were considered moderate-to-low probability for cultural resources, while areas with better developed soils and more level topography in northern portion of the area offered a higher probability for cultural resources. That latter area was subject to systematic shovel testing. In the remainder of the property, in the moderate-to-low probability areas, the karstic landscape was dominated by ridge and swale topography oriented southwest to northeast. Many areas exhibited limited soil development exposed/surface limestone. The rocky and steeply (>10⁰) sloped portions with poorly developed soils were subjected to pedestrian reconnaissance supplemented by judgmental shovel testing in any areas that exhibited the potential for soil development, more gradual (<10⁰) slope, or level topography.

Research Objectives. Once the APE for cemetery construction within the 101.2 ha (250 ac) larger property is defined, additional Phase I survey will focus on areas within the APE for which additional baseline data are required. Phase I archeological investigations are designed to identify any archeological resources present within the project area; to determine the approximate horizontal and vertical boundaries of any identified resources; and, to make preliminary assessments of the potential for significance of any identified resources applying the National Register Criteria for Evaluation (36 CFR 60.4 [a-d]). For each identified resource, the study will describe: (1) its nature, age, and function; (2) its horizontal and vertical boundaries; and, (3) it will provide a preliminary assessment of archeological integrity and research potential.
Task 1: Controlled Interval Shovel Testing.
For shovel testing, a 20 m (65.6 ft) interval will be used, augmented by a 10 meter interval cruciform re-testing pattern. Shovel tests will measure a minimum of 35 cm (13.8 in) in diameter and will be excavated to a minimum depth of 10 cm (3.9 in) into culturally sterile subsoil, except where soil conditions prevent full excavation. Transects will receive a letter designation, and each shovel test will be numbered. Soil will be removed according to natural stratigraphic horizons and screened through 0.635 cm (0.25 in) hardware cloth. The location of each shovel test within the sampling pattern, the depths of the stratigraphic zones, and the presence or absence of cultural materials will be recorded in the field. Soil characteristics, including color and texture, will be recorded using standard soils nomenclature. Recovered cultural materials will be placed in bags labeled with horizontal and vertical provenience data. Positive shovel test locations will be recorded using a Trimble GPS unit with mapping grade/sub-meter accuracy.

The shovel test pattern and the locations of all shovel tests will be plotted on aerial photographs and on U.S.G.W.S. 7.5 minute quadrangle topographic maps. Field documentation also will include digital photography, survey area descriptions, survey area maps, shovel test forms, daily field notes, and photographic and field sample logs. Standard records, artifact inventories and catalogues will follow guidelines accepted by the Puerto Rico SHPO.

Task 2: Laboratory Analysis.
In the field, all artifacts will be bagged and labeled according to provenience. The materials then will be cleaned, inventoried, packaged, and prepared for curation and delivered to a federally-approved curation facility. All artifacts will be cleaned and processed as appropriate for each artifact type and condition. All cultural materials will be subjected to analysis and inventory using standard software computer-based programs. For the inventory, each entry will include the material class, the artifact type, functional category, and site and provenience designations. The resulting artifact catalog will include artifact attribute data, artifact counts, comments, and manufacture date range information. All documentation, processing and analysis will be conducted following federal and Puerto Rico guidelines.

Task 3: Reporting.
Upon completion of field investigations, laboratory processing, and data analysis, a draft technical report will be prepared that describes the findings of the investigations and that presents management recommendations based on those findings. The report will review the findings of the archeological work, and discuss any identified cultural resources and potential impacts to them. Management recommendations will be made for each cultural resource identified. These recommendations may include the development of avoidance protocols such as buffer zones; the creation of “no work” areas; additional investigations to determine the significance (36 CFR 60.4 [a-d]) of a site(s); or no further work, as appropriate. The management recommendations will take into consideration plans for the project, in order to accomplish a best-fit analysis that seeks to accommodate both the project and preservation concerns.

Curation of Cultural Materials.
All artifacts will be prepared for eventual curation at a federally-approved curation facility, such as the Alabama Museum of Natural History, Moundville, Alabama or a similar repository meeting federal curation standards set forth in 36 CFR Part 79, Curation of Federally-Owned and Administered Archeological Collections.
References

36 CFR Part 60 “National Register of Historic Places”
36 CFR Part 79 “Curation of Federally Owned and Administered Archaeological Collections”
National Historic Preservation Act of 1966, as Amended (NHPA), 16 USC 470
Native American Graves Protection and Repatriation Act (NAGPRA), 25 USC 3001 et seq.

Advisory Council on Historic Preservation (ACHP)

AGI
1510-1520 Contaduria, legajo 1071, Archivo General De Indias, Seville (Microfilm of 1071 is held in Frederick, MD).

Barse, William P. and Daniel J. Grose

Veléz, Jaime G.
2006 Proyecto Cordillera del Rio: Evaluacion Arqueologica, Fase IB Preparado para Guitierrez-Latmer, CSP Architects-Engineers-Planners San Juan, PR.
Figure 1. Map showing the locations of identified sites within the proposed Cemetery property.
Figure 2. Location of Quebrada Franquez 1 (MR0100012)
Figure 3. Photograph of the location of Quebrada Franquez 1 (MR0100012) Looking Southeast

Figure 4. Photograph of Precolombian Sherds from Quebrada Franquez 1 (MR0100012)
Quebrada Franquez 2 (MR0100013) UTM Zone 19 NAD83

Positive Pre Columbian - Proposed Unit Location
Positive Historic Site Boundary
Positive Historic and Pre Columbian

Not Excavated

Figure 5. Location of Quebrada Franquez 2 (MR0100013)
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March 2, 2016

Mr. Glenn Elliott  
Environmental Engineer P P/M  
Office of Construction & Facilities Management  
US Department of Veterans Affairs  
425 I (eye) Street, NW, Room 6W417a  
Washington, D.C. 20001

SHPO: 04-08-10-02 INTENSIVE ARCHAEOLOGICAL SURVEY (STAGE II)  
WORK PLAN (REVISED), PROPOSED NATIONAL CEMETERY,  
DEPARTMENT OF VETERANS AFFAIRS, PR-137, MOROVIS, PUERTO RICO

Dear Mr. Elliott:

We acknowledge the receipt of the revised intensive archaeological survey work plan (Stage II) dated January 2016 related to the above referenced project. This work plan was requested by our Office on letter dated October 22, 2015 and comments to its first version were submitted on letter dated January 7, 2016.

We believe the above referenced work plan is deemed acceptable with two conditions. Please be advised that information related to above-surface structures and/or buildings (i.e., alleged dairy farm remains) within the proposed project area should be included in the work plan, as stated in previous letters. Likewise, we reiterate our previous comment regarding archeological testing for evaluation: it should not proceed beyond the point of providing the information necessary for evaluation and should not unnecessarily affect significant features or values of the property. Therefore, 1.00 m x 1.00 m archaeological units (not larger) for the evaluation of Quebrada Franquez 1 and Quebrada Franquez 2 archaeological sites are sufficient.

Please, be advised that any changes to the field testing strategy, in response to observed field conditions, should only be made after consultation and concurrence among the consulting parties.

One original and one copy of the draft report for the stage II intensive archaeological survey should be submitted to our Office for review and comments prior to the final
SHPO: 04-08-10-02 INTENSIVE ARCHAEOLOGICAL SURVEY (STAGE II) WORK PLAN (REVISED), PROPOSED NATIONAL CEMETERY, DEPARTMENT OF VETERANS AFFAIRS, PR-137, MOROVIS, PUERTO RICO

version. We hereby request to be informed in advance of the commencement of the field work survey (stage II) in order to coordinate a site visit.

If you have any questions you may contact Archaeologist Marinés Colón, Historic Property Specialist, at (787) 721-3737 or mcolon@prshpo.pr.gov.

Sincerely,

Diana López Sotomayor, Archaeologist
State Historic Preservation Officer

DLS/NAPT/BRS/MC
U.S. Department of Veterans Affairs

Phase II Cultural Resources Investigation

Field Work Report

Puerto Rico National Cemetery
Municipality of Morovis, Puerto Rico
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1. Introduction

This document is the Field Work Report for the Phase II Cultural Resources Investigation associated to the new Puerto Rico National Cemetery Replacement proposed by the U.S. Department of Veterans Affairs (VA) within a site of approximately 247.4 acres (255 cuerdas). The 247-acre site is located in the municipality of Morovis at Road PR-137 (PR-137), Km. 11, in the Fránquez Ward (see Figure 1).

The Project site has been used for agricultural activity, including cattle grazing, and associated residential use during the last century, as per available cultural resources studies conducted for the site and aerial images. Currently, the site is not in use and predominantly consists of a natural landscape where the remaining of residential structures, electrical utilities and internal roads can be observed.

The field work was executed by Archl. Aramis Font Negrón and conducted according to the revised Intensive Phase II Archaeological Survey Work Plan (the Plan) prepared by R. Cristopher Goodwin & Associates, Inc. (CGA) (January 2016) and accepted by Puerto Rico State Historic Preservation Office (SHPO) via letter dated March 2, 2016. The field activities were also carried out following standard procedures accepted by the SHPO and the Institute of Puerto Rican Culture. This document contains the following sections:

- Introduction
- Field Methodology and Approach
- Stratigraphic Description
- Results (Field Findings)
- Appendices
  - Appendix A: Pictures
  - Appendix B: Coordinates Tables

According to the Plan there were three (3) main areas to be studied: Quebrada Fránquez 1 (MR100012), Quebrada Fránquez 2 (MR100013) and Las Cruces de Catalina (0100011). Also investigation on the above-surface structures or buildings (i.e., so called “dairy farm remains”). Refer to Figure 2 for the location of these areas.

The areas studied within the site are based on the results from the Archeological Site Investigation for the Proposal VA National Cemetery (2010) performed by CGA; and Stage I Archeological Investigation (2006) performed by Archl. Jaime Veléz.
Legend:
- Study Areas (Field Work Plan)
- Roads
- Property Limit
- Municipal Limit

Notes:
1. Location is approximate.

Source:
2. Information provided by the Puerto Rico Planning Board.
4. The original map scale is 1:20,000.

Coordinate System:
State Plane NAD83 Puerto Rico FIPS 5200 (meters)

Figure 1: Location Map
(Topographic Map)
U.S. Dept. of Veterans Affairs, Morovis, PR
Legend:
- Study Areas (Field Work Plan)
- Roads
- Hydrography
- Property Limit
- Municipal Limit
- Ward Limit

Note:
- Location is approximate.

Sources:
3. Information provided by the Puerto Rico Planning Board.

Coordinate System:
State Plane NAD83 Puerto Rico
& Virgin Islands FIPS 5200 (Meters)

Figure 2: Location Map (Aerial Photograph)
U.S. Dept. of Veterans Affairs, Morovis, PR
2. Field Methodology and Approach

The field work was executed by Archeologist Aramis Font Negrón and conducted according to the Plan accepted by SHPO via letter dated March 2, 2016; and following standard procedures accepted by this agency and the Institute of Puerto Rican Culture.

The field work is limited to the following areas, as identified in the Plan:

- Quebrada Fránquez 1 (MR100012)
- Quebrada Fránquez 2 (MR100013)
- Las Cruces de Catalina (MR0100011)
- Above-surface structures and/or buildings (“dairy farm remains”)

As a first step, these areas were surveyed to locate the datum points provided by Mabbett & Associates and depicted in the Plan developed by CGA for the Project site. Once the areas were found, the strategy was to clean the area to establish the datum point and begin the different transects. Field tasks performed include the following actions:

2.1 Task – Shovel Testing for Site Delineation and Mapping

Systematic shovel testing to identify the approximate boundaries of each site, and to identify areas with artifact concentrations. All shovel tests measured a minimum of 35 cm (13.8 in) in diameter, and were excavated to a minimum depth of 10 cm (3.9 in) into culturally sterile subsoil, following natural stratigraphy. All soils were screened through a ¼ in hardware mesh. Shovel test data was recorded including the location of each test, the significant aspects of the natural or cultural landscape, and the presence or absence and nature of previous disturbances and cultural features. Documentation of shovel test areas includes detailed field notes, photo-recording of survey areas and identified sites, and graphics location shovel tests pits performed. A GPS unit with mapping grade/sub-meter accuracy capability was used to record the archeological site and establish the approximate boundaries.

The shovel test pits were excavated every 15 meters from the established datum point, if a positive test resulted then another test pit was excavated every 5 meters, until a negative result was obtained. These shovel test pits were excavated at the three (3) areas identified in Figures 2 thru 5.

2.1.1 Quebrada Fránquez 1 (MR100012)

The test pits were conducted on a cross-like pattern every 15 meters, starting from the two (2) datum points previously established. MR100012-A1 was our starting point for the north-south and east-west directions. Same approach was performed with the second datum point, MR100012-A2. A total of 25 test pits were excavated on the area, of which five (5) tests were positive to the presence of cultural material.
2.1.2 Quebrada Fránquez 2 (MR100013)

A crosshead oriented with the cardinal point was marked with the Datum MR0100013-B1 as a starting point. Excavations occurred every 15 meters by reducing the distance to every 5 meters if positive results were detected. A total of 79 test pits were done, with 16 reflecting positive results to cultural remains material, such as fragments of glass, a glass bottle, historical ceramics, possible Criolla pottery and metal. The majority of the positive pits are on the south side of the studied area.

2.1.3 Las Cruces de Catalina (MR0100011)

At this location, shovel testing and documentation were performed around the rock outcrop. The first four (4) shovel tests were placed at each of the cardinal directions (north, south, east and west) around and within approximately five (5) meters from the rock outcrop. A total of 12 pit holes were excavated via shovel tests at varied depth due to the presence of limerock within the surrounding grounds. Shovel tests were performed at 15 meter intervals. All shovel tests shown negative results. A total of five (5) crosses were detected engraved on the rock outcrop.

2.2 Task – Excavation Units

2.2.1 Quebrada Fránquez 1 (MR100012)

This is an isolated area west of the Fránquez creek that had to be crossed in order to complete the work. The Plan contemplated excavation of two (2) to four (4) 1 x 1 meter (3.3 x 3.3 ft.) excavation units or the equivalent, to examine the stratigraphic sequence and to enable assessment of the integrity of the site. Originally, one unit was intended to be situated adjacent to each of the two (2) previous artifact producing shovel tests (Shovel Test N860 E1260, and Shovel Test N850 E1260).

The presence of calcareous rocks (limestone) at surface was evident. Based on the natural characteristics of the areas and geology, three (3) excavation units were performed. Excavation unit number 1 was located in an area to the south, where the shovel test showed positive results (between units A2S6 and A2E7). It showed positive results to cultural material remains, which consist of metal and glass fragments and historical ceramic (including Criolla pottery in low concentration). At the southeast corner of excavation unit number 3, a piece of flagging tape was found at a depth of approximately 15 cm.

2.2.2 Quebrada Fránquez 2 (MR100013)

The Plan contemplated excavation of six (6) to eight (8) 1 x 1-meter excavation units or the equivalent to examine the stratigraphic sequence and to assess the depositional integrity of the site. Three (3) units were intended to be placed in the vicinity of the three (3) previous shovel tests that produced the largest quantities of cultural materials (Shovel Test N1240 E670, Shovel Test N1240 E690, and Shovel Test N1260 E690). A fourth test unit was intended to be placed in the northern portion of the site, to test in the vicinity of the positive shovel test at N1320 E660,
while a fifth unit was intended to be placed in the vicinity of N1250 E680, to examine the previously untested central portion of the site.

Due to the results of the previous task (Shovel test for Site Delineation and Mapping), excavation units had to be repositioned according to the new shovel tests performed and reflecting positive results. A total of six (6) excavations units were performed at a larger size (5 X 5 meters) and at a varied depth due to the local geology. Units 1, 2 and 6 did not show any cultural material remains. Units 3, 4 and 5 showed presence of fragments of historical artifacts, stone, coal, metal and possible Criolla ceramic, but in very low concentrations.

2.3 Task - Investigation on the above-surface structures and/or buildings within Project Area (i.e., the so called “dairy farm remains”)

A field reconnaissance was performed within the Project site. Field evidence of the so called “dairy farm remains” in previous studies could not be found within the Project site. Observations were limited to objects such as tires, hoses, metals, etc., detected within the Project site and various above surface concrete structures (modern residences, not historic) and what appear to be a horse stable. These are located within the northern and central portion of the Project site and where visited, photographed and documented.
Legend:

- Original Site Boundary
- Preliminary Site Mapping and Delineation (0.18 Acres)

Test Pit*

- Positive Result
- Negative Result

Unit Location*

- Positive Result
- Negative Result

Note:
* Location is approximate.

Source:

Coordinate System:
State Plane NAD83 Puerto Rico & Virgin Islands FIPS 5200 (Meters)

Figure 3: Quebrada Franquez I (MR100012) Results
U. S. Dept. of Veterans Affairs, Morovis, PR
Figure 4: Quebrada Franquez II (MR100013) Results

Legend:
- Original Site Boundary
- Preliminary Site Mapping and Delineation (0.56 Acres)
- Test Pit*
  - Positive Result
  - Negative Result
- Unit Location*
  - Positive Result
  - Negative Result

Note:
* Location is approximate.

Source:

Coordinate System:
State Plane NAD83 Puerto Rico & Virgin Islands FIPS 5200 (Meters)

Scale: 1:445
0 5 10 20 Meters
Legend:
+ Las Cruces (rock outcrop)
* Test Pit
- Negative Result

Note: * Location is approximate.
Source:
Coordinate System:
State Plane NAD83 Puerto Rico & Virgin Islands FedEx X300 (Nad83)

Figure 5: Cruces de Las Catalinas (MR0100011)
Results
U.S. Dept. of Veterans Affairs, Morovis, PR
3. **Stratigraphic Description**

a. Quebrada Fránquez 1 (MR100012)
   
   i. **Humus**
   
   ii. Clay Sandy (*loam*). Munsell Scale of 10YR 2/2
   
   iii. Clay Sandy (*loam*). Munsell Scale of 10YR 3/2
   
   iv. Sandy. Munsell Scale of 10YR 5/6

b. Quebrada Fránquez 2 (MR100013)
   
   i. **Humus**
   
   ii. Clay Sandy (*loam*). Munsell Scale of 10YR 2/2
   
   iii. Clay Sandy (*loam*). Munsell Scale of 10YR 3/2
   
   iv. Clay Sandy (*loam*). Munsell Scale of 10YR 5/6
   
   v. Sandy. Munsell Scale of 10YR 6/6
   
   vi. Sandy. Munsell Scale of 2.5YR 4/6
   
   vii. Clay Sandy (*loam*). Munsell Scale of 10YR 4/4

c. Las Cruces de Catalina (MR0100011)
   
   i. **Humus**
   
   ii. Clay Sandy (*loam*). Munsell Scale of 10YR 2/2
   
   iii. Clay Sandy (*loam*). Munsell Scale of 10YR 3/2
   
   iv. Clay Sandy (*loam*). Munsell Scale of 10YR 3/3

This only indicates stratigraphy present in the area, not the order in which it is found.

4. **Results (Field Findings)**

Below is presented the results obtained from the field work executed as part of the Phase II Cultural Resources Investigation for the new Puerto Rico National Cemetery Replacement in Morovis. Overall, the recovered materials apparently were carried either by rain or machinery of some kind, possibly as the result of past land uses.

Based on the results obtained, monitoring by a certified archaeologist is warranted during the construction phase, at or near both the Quebrada Fránquez 1 (MR100012) and Quebrada Fránquez 2 (MR100013) sites.
Even with the limited presence of cultural resources and the lack of integrity of the archaeological material recovered during the field work, a source of origin can be determined to avoid or minimize potential impacts.

According to the results of the test pits and controlled excavation units, the following is concluded.

4.1 Quebrada Fránquez 1 (MR100012)

- The absence of cultural resources in the area to the north and east of the site was determined. The presence of historical cultural material in the area to the South and West of the site was confirmed (Figure 3).
- The archaeological material recovered is varied and dispersed. The archaeological material recovered from the test pits and units appears to be out of context and dispersed, mostly consisting of ceramics.
- The source of cultural material found is not yet known and may need to be addressed.

4.2 Quebrada Fránquez 2 (MR100013)

- The absence of cultural resources in the area to the north and west of the site was determined. The presence of historical cultural material is confirmed in the area to the south and east. The archaeological material recovered is limited and dispersed, consisting of fragments of glass, a glass bottle, historical ceramics, possible Criolla pottery and metal.
- However, the archaeological material recovered from the test pits and units appears to be out of context.
- The source of cultural material found is not yet known and may need to be addressed.

4.3 Las Cruces de Catalina (MR0100011)

- All shove tests shown negative results. This determined the absence of cultural material around the rock outcrops.
- A total of five (5) engraved crosses were detected on the rock outcrop.

4.4 Above-surface structures and/or buildings within Project Area (i.e., the so called “dairy farm remains”)

Evidence of the so called “dairy farm remains” in previous studies was not found within the Project site. Observations were limited to objects such as tires, hoses, metals, etc., detected within the Project site and various above surface concrete structures (modern residences, not historic). The principal components of these structural remains were observed on a historical aerial view, which include what appears to be
a main house (residence), an adjacent small house, a detached garage, and what seems to the horses stable\(^1\) (barn).

At the horses stable the floor is completely covered by vegetation. The stable was identified though historical aerial photos, but at the moment of the field reconnaissance only what appear to be the concrete slab (floor) was observed at the site. No standing structural components were detected.

The residence and related structures are located approximately 50 meters to the east from the internal road that runs from north to south within the property. A short access (asphalted) is connected to the internal road providing ingress and egress to the residence (concrete) structures area. A front gate is still standing.

The main house consists of a one story concrete structure that can be differentiated from the other structures. It has modern characteristics, due to its layout and shape (including floors and walls). The house consisted of an L-shaped, wide kitchen, swimming pool with a small room that could has been possibly used as a storage area, and a shower or dressing room. The house has a living and dining room entrance, with stairs to the outdoor patio that has a fountain. It possessed three (3) bedrooms and two (2) bathrooms. The swimming pool porch had a concrete outdoor kitchen (barbecue area) with a countertop decorated with tiles. Also, the floor of this area is decorated with large clay tiles. Stairs connected to the large swimming pool at the back of the main house. These structures are deteriorated and have trees growing inside the area.

The small one story house shows structural similarities to houses from the 1950’s to the 1970’s. The remains of this house are built in concrete and seemed to have poor structural details. The house has two (2) entrances, one through a small balcony or porch, and another to the south side. The entrance through the porch seems to be the main entrance. It has three (3) bedrooms, a bathroom and a kitchen area. It was not possible to identify or locate what could be the living room. The floor is covered with deteriorate vinyl tiles.

\(^1\) Apparently constructed between 1995 and 2004.
5. **APPENDICES**

Appendix A – Photographic Documentation

Appendix B – Coordinates Tables
APPENDIX A: Photographic Documentation
Quebrada Fránquez 1
Quebrada Fránquez 2
Las Cruces de Catalina
Remaining of Horses Stable
Remaining of Concrete Structures (Residences)
APPENDIX B: Coordinates Tables
## GPS Coordinates for Quebrada Fránquez 1

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January 5, 2017

Mr. Miguel Bonini
State Historic Preservation Officer
P.O. Box 9023935
San Juan, PR 00902-3935

RE: Submittal - Phase II Cultural Resource Investigation Report (SHPO ID 04-08-10-02)
Proposed Puerto Rico National Cemetery Replacement
Morovis, Puerto Rico

Dear Mr. Bonini:

The U.S. Department of Veterans Affairs (VA) is pleased to submit the Phase II Cultural Resources Investigation Report for the proposed Puerto Rico National Cemetery Replacement in the Fránquez and Barahona ward in Morovis, Puerto Rico. The project site comprises approximately 247 acres and is located at PR-137 Km 11 in Morovis. The Phase II Cultural Resources Investigation was completed according to the Phase II Cultural Resources Investigation Work Plan dated January 2016 and approved by your office in a letter dated March 2, 2016.

The Phase II Cultural Resource Investigation Report includes a determination of eligibility for nomination to the National Register of Historic Places. Based on the results of the investigations presented in the report, Dr. N. Medina Carrillo has concluded that Cueva de la Moca (MR0100010), a Precolumbian site containing ceramics that appear to date to the Ostiones Culture as well as a possible human burial, is eligible for inclusion in the National Register of Historic Places (under Criterion D), as it may “have yielded or may be likely to yield, information important in history or prehistory.” Accordingly, the VA has designed the layout of the proposed Puerto Rico National Cemetery Replacement to include an approximately 123-acre preservation area, where no development will occur, and which encompasses the Cueva de la Moca, as well as two other sites investigated at the project parcel but deemed ineligible for inclusion: Quebrada Franquez 1 (MR0100012), which is a horizontally discrete Precolumbian site; and Quebrada Franquez 2 (MR0100013), a multicomponent site that includes both historic period and Precolumbian material. Therefore, these resources will be preserved in perpetuity.

The VA does propose to develop the cemetery around the site of Las Cruces de Catalina (MR0100011), which was also deemed ineligible for inclusion, and therefore a buffer zone would not be warranted around this site. However, the develop would not directly impact this site.

Through the Section 106 consultation process, the VA respectfully requests concurrence from your office of these eligibility determinations, as well as concurrence that the Proposed Action will have no adverse effect on these sites. If any additional information is needed feel free to contact me via phone at 202.632.5879 or email at Glenn.Elliott@va.gov.

We appreciate your review and concurrence determination for this project.

Sincerely,

1/5/2017

Glenn Elliott
Environmental Engineer

Attachment: Phase II Cultural Resource Investigation Report

cc: Andrew Glucksman, Mabbett & Associates, Inc.
Archaeological Investigations for the propose VA National Cemetery, Morovis, Puerto Rico

December 7, 2016

By: N. Medina Carrillo, Ph.D

The present assessment discusses the cultural resources present in the venue of land of 254.77 acres considered for the development of the project of the National Cemetery of the Department of Veterans of the United States in Morovis Puerto Rico. Evaluation of the resources documented in the research Phase I (IA/IB) and Phase II in terms of its importance to be included in the National Registry by applying the criteria for the evaluation of the National Register of Historic Places contained in the 36 CFR 60.4.

"The social meaning, seniority and the integrity of the resource or historic property are the first issues to be considered. The specific criteria established by the National Park Service, which must be taken into account and serve as the basis for evaluation, stipulate that the site or property:

A. Is related to events that have contributed significantly to moments or periods in the history of the community or nation.

B. Is related with the lives of significant people in the past.

C. Exemplifying, in the case of buildings, the distinct characteristics of a type, period or method of construction; or the representation of a master work that possess high artistic values; or that represent an important entity and distinguishable whose components may lack individual distinction.

D. Has revealed or has the possibility of providing important information in the history or the prehistory."

The documents related to this project include; Phase IA carried out by Jaime Velez for the Cordillera del Rio project in 2005, the Phase IB of Jaime Velez for the same project carried out in 2006, the Phase I made by R. Christopher Goodwin & Associates, Inc. 2011, in charge of the Arql. Suzanne L. Sanders as Principal Investigator for the Puerto Rico National Cementery project and the summary of the Field Report of Phase II for the project Puerto Rico National Cemetery by the Arql. Aramis Font in 2016. After the revision of the reports and documents mentioned above we understand that cultural resources discovered in the different phases of

1SHPOPuertoRico.
http://www2.pr.gov/oech/oech/Documents/ActualizacionDatosMunicipales/DocumentosComunes/Introducci%C3%B3n%20al%20Registro%20Nacional.pdf
Archaeological research in the premises under study are identify as: Quebrada Fránquez 1 (MR100012), Quebrada Fránquez 2 (MR100013) and the Cruces of Catalina (0100011). In addition, it will be considered for evaluation a set of abandoned structures corresponding to the remnants of two abandoned houses and a horse stable. This evaluation also includes Cueva La Moca. This resource was detected by Roberto Martinez in 2005-2006.

To organize the discussion we use the nomenclature established in Phase I study conducted by Arql. Suzanne L. Sanders. In this report the farm of 254.77 acres was divided in three sectors; Sector A, Sector B and Sector C (Figure 1).

**Figure 1: System of archaeological exploration of the Phase IB**

AREA A: Boreholes in grid of 20 meters

Area B: Boreholes in grid of 40 meters

Area C: Inspection/travel of field and evidence of selective survey
Area A

The Cruses of Catalina (0100011) - Located in the eastern area of the farm under study, this area was identified as Area A in the study of Goodwin & Associates, Inc. in 2011. It consists of a limestone rock exposed with two Christian crosses carved on its surface. Can be interpreted as modern petroglyphs carved at the beginning of the twentieth century to mark the site. They were identified by Jaime Vélez at the study of 2006. Associated with the traditional rural Catholicism, the archaeologist Roberto Martinez relates the site with a cultural event of engraving crosses in the rural area of Morovis. According to Martinez, these engraving form part of the catholic culture folklore of peasant “jíbara moroveña”. According to an oral history documented by Martinez in 2005-2006, the person who made the stone carving was considered by the community as person who was insane. Using as a reference the report Phase IB of Jaime Velez, in the documents annexed to that report, Annex 3, it gives a detailed survey conducted by Roberto Martinez. Based on all the documented information recorded and analyzed, we consider that the cultural element known as the Cruces of Catherine does not qualify for inclusion in the Registration of Historic Places under any of the established criteria.

However, the design proposed for the National Cemetery project submitted by VA proposes the conservation in perpetuity of this item "in situ" with a buffer zone around.
Area B

Quebrada Fránquez 1 (MR100012)/Locus 2- In Phase I of 2011 the archaeologist Arql. Suzanne L. Sanders, describes this place as Locus 1, a small dispersion of four pieces of Pre-Columbian pottery fragments in an area of 10 by 20 meters. The fragments are small, less than 2 centimeters in diameter. Additional boreholes at intervals of 10 meters were made. In the additional wells made there were recovered one fragment of Pre-Columbian pottery. Other additional boreholes were established around the positive well however, all additional wells were negative. The pre-Columbian potteries recovered in low frequency and without cultural association define. This is a small archeological site, failed to be associate to any specific Pre-Columbian culture, it contains some potential research however two isolated findings were recorded in this study, which were interpreted as casual and do not possess the qualities of integrity and meaning (36 CFR 60.4). Therefore, no additional work is recommended for the isolates 1 and 2. Locus 1 is a small dispersion of the Pre-Columbian pottery of 10 x 20 meters (32.8 x 65.6 ft) in the area. None of the fragments could be dated. Although this site is small and cannot be allocated to a specific Pre-Columbian culture, could have the potential of research (36 CFR 60.4 [a-d]), because there is a shortage of open places in the highlands of the interior of the center of Puerto Rico. Therefore it is recommended to avoid the Locus 1 in the planning and construction of the project.¹

During Phase II in 2016 Arql. Aramis Font excavate three units in this site and determines; "The absence of cultural resources in the area to the north and east of the site was determined. The presence of historical cultural material in the area to the South and West of the site was confirmed. The archaeological materials recovered is varied and dispersed. The archaeological materials recovered from the test pits and units appear to be out of context and dispersed, mostly consisting of ceramics. The source of cultural material found is not yet known and may need to be addressed."²

Based on all the archaeological information recorded and analyzed by both archaeologists, we consider that the cultural element known as Quebrada Fránquez 1 (MR100012) does not qualify for inclusion in the Register of Historic Places under any of the established criteria.

² Font, Aramis Phase II Cultural Resources Investigation Field Work Report, Page. 11.

Area C

Quebrada Fránquez 2 (MR100013) /Locus 2- were identified during the Phase IB of Jaime Vélez as a “Small dispersion of historical materials and Pre-Columbian. The site concentrates in an area of 30 by 30 meters at the top of a small hill. Three small fragments of Pre-Columbian pottery (less than one centimeter) were recovered. The ceramics recovered cannot be relational with its cultural association. Historical ceramics were recovered associated chronologically in the XIX century. The site can be associated with a domestic site (home) of the nineteenth century jibaro house. The site probably has archaeological integrity. In Phase I of 2011 the archaeologist Arql. Suzanne L. Sanders describes this place as "Locus 2 a small dispersion of historical material and Pre-Columbian 30 x 30 meters in a small hill. The development of the land in this site has been deeper and better developed than in other peaks in the area, indicating that this site probably has archaeological integrity and possibly features intact. Therefore, it is recommended to avoid the Locus 2 in the planning and construction of the project." 4

However, during Phase II conducted by Aramis Font in 2016, the researcher explained the site in the following way, "Due to the results of the previous task (Shovel test for Site Delineation and Mapping), excavation units had to be repositioned according to the new shovel tests performed and reflecting positive results. A total of six (6) excavations units were performed at a larger size (5 x 5 meters) and at a varied depth due to the local geology. Units 1, 2 and 6 did not show any cultural material remains. Units 3, 4 and 5 showed presences of fragments of historical artifacts, stone, coal, metal and possible Creole ceramic, but in very low concentrations." "The absence of cultural resources in the area to the north and west of the site was determined. The presence of historical cultural material is confirmed in the area to the south and east. The archaeological materials recovered is limited and dispersed, consisting of fragments of glass, a glass bottle, historical ceramics, possible Creole pottery and metal." "However, the archaeological materials recovered from the test pits and units appear to be out of context. The source of cultural material found is not yet known and may need to be addressed."

Based on all the archaeological information recorded and analyzed by the archaeologists, we consider that the cultural element known as Quebrada Fránquez 2 (MR100013) does not meet criteria of research that qualifies the site for inclusion in the Registration of Historic Places under any of the established criteria.

4 Font, Aramis Phase II Cultural Resources Investigation Field Work Report, Page. 11
**Moca’s Cave** – This cave is result of erosion of limestone rock by flow of groundwater, located on the west side of the base of a sump in the Area C. It was identified in the study of Phase IA of Jaime Vélez 2006. **Possible human burial associated with ceramic fragments ostionoid.** The site presents the integrity and defined meaning. Possible ceremonial site or burial associated with the culture pre-taina (ostionoid) by its association with burial practices of the pre-Taina culture. The cave contains monochrome pictographs with possible animal motives. These pictographs are present in the area of darkness in the southern part of the cave. The cave also contains other remnants of diffuse pictograph. Moca’s Cave extends approximately 57 meters in length. The entrance of the cave has 2 meters by 2.4 meters in diameter. The ceiling of the cave reaches approximately 3.50 meters high. In Phase IB Arq. Jaime Velez outlined the work of field research conducted by the Arq. Roberto Martinez in the cave. In the boreholes made by Martinez in area one of the wells in the entrance of the cave was positive to pottery painted black on the inside and a fragment of human bone identified by Dr. Edwin Crespo Martinez associates the ceramic remains with period III, pre taino. The presence of the rupestrian art, ceramics and human remains suggests a possible ceremonial use of the cave during the pre taino period (600 to 900 d.C.)

**Figure 2:** Moca’s Cave documentation

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During Phase I of 2011 of the archaeologist Arql. Suzanne L. Sanders described this place, "Moca’s Cave" was identified in a previous study (Vélez 2006), and was revised during the current investigation. Loader tests were carried out at the entrance of the cave during the study in 2006; during the current survey, there were not carried out tests of additional loader in the cave, but the evidence of previous loader (Vélez 2006) were verified in the same. The possibility of additional human remains was observed during the previous study (Vélez 2006), which found ceramic fragments Ostionoid and a sliver of human bone. “The presence of human remains and artifacts associated perhaps indicate that this site may possess both the integrity and the meaning defined by the criteria for the evaluation of the National Registration of Historic Places (36 CFR 60.4). Therefore, it is recommended to avoid Moca’s Cave in the planning and construction of the project."

Based on the entire archaeological information recorded by Jaime Velez and Roberto Martinez and analyzed by both archaeologists, we consider that Moca’s Cave is eligible for inclusion in the National Registration of Historic Places under Criterion D "has revealed or has the possibility to provide important information in the history or the prehistory."

Because of archaeological importance of this resource, the design of the proposed project for the National Cemetery submitted by the VA proposes the conservation in perpetuity of this item "In situ". To that effect, the Dept. of Veterans Affairs agreed to subscribe an agreement with the PR Dept. of Natural and Environmental Resources for the conservation of the area of the property where the cave is located.

**Abandoned structures of two houses and a horse stable** during Phase II conducted by Aramis Font in 2016, the researcher explained the site as it follows; "A field reconnaissance was performed within the Project Site. Field evidence of the so called "dairy farm remains" in previous studies could not be found within the Project site. Observations were limited to objects such as tires, hoses, metals, etc., detected within the Project Site and various above surface concrete structures (modern residences, not historic) and what appear to be a horse stable. These are located within the northern and central portion of the Project site and where visited, photographed and documented."

The structures were documented during the prospecting of field of Phase II by the archaeologist Font. There were no items with historic, architectural or archaeological value in the set.

“At the horses stable the floor is completely covered by vegetation. The stable was identified though historical aerial photos, but, at the moment of the field reconnaissance only what appear to be the concrete slab (floor) was observed at the site. No standing structural
components were detected. The residence and related structures are located approximately 50 meters to the east from the internal road that runs from north to south within the property. A short access (asphalted) is connected to the internal road providing ingress and egress to the residence (concrete) structures area. A front gate is still standing.

The “main house” consists of a one story concrete structure that can be differentiated from the other structures. It has modern characteristics, due to its layout and shape (including floors and walls). The house consisted of an L shaped, wide kitchen, swimming pool with a small room that could has been possibly used as a storage area, and a shower or dressing room. The house has a living and dining room entrance, with stairs to the outdoor patio that has a fountain. It possessed three (3) bedrooms and two (2) bathrooms. The swimming pool porch had a concrete outdoor kitchen (barbecue area) with a countertop decorated with tiles. Also, the floor of this area is decorated with large clay tiles. Stairs connected to the large swimming pool at the back of the main house. These structures are deteriorated and have trees growing inside the area.

The small house consist of a one story house, it shows structural similarities to houses from the 1950’s to the 1970’s. The remains of this house are built in concrete and seemed to have poor structural details. The house has two (2) entrances, one through a small balcony or porch, and another to the south side. The entrance through the porch seems to be the main entrance. It has three (3) bedrooms, a bathroom and a kitchen area. It was not possible to identify or locate what could be the living room. The floor is covered with deteriorate vinyl tiles."^4

Based on the description and the archaeological information recorded and analyzed by Aramis Font in Phase II of 2016, and documented in pages 18-23 in the Draft Field Report for Phase II, we consider that the cultural element known as set of abandoned structures corresponding to the remnants of two houses and a horse stable does not meet criteria of historical value or architectural significance that qualifies the remains of this concrete structures for inclusion in the Register of Historic Places under any of the established criteria.

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Bibliography

Stage IA Vélez, Jaime Phase IA Project Cordillera Del Rio in 2005.

Stage IB Vélez, Jaime Phase IA Project Cordillera Del Rio in 2006.


Appendices

Appendix 1: Location of the cultural resources

Appendix 2: Moca Cave, 2006
Appendix 1: Location of cultural resources

Figure 1: Location Map
(Topographic Map)
U.S. Dept. of Veterans Affairs, Morovis, PR
Appendix 2: Documentation of Moca Cave, 2006
February 13, 2017

Mr. Glenn Elliott  
Environmental Engineer P P/M  
Office of Construction & Facilities Management  
US Department of Veterans Affairs  
425 I (eye) Street, NW, Room 6W417a  
Washington, D.C. 20001

SHPO: 04-08-10-02 PROPOSED NATIONAL CEMETARY, DEPARTMENT OF VETERANS AFFAIRS, PR-137, KM. 11, BARAHONA AND FRANQUEZ WARDS, MOROVIS, PUERTO RICO

Dear Mr. Elliot:

We acknowledge the receipt of a document titled “Archaeological Investigations for the propose (sic) VA National Cemetery, Morovis, Puerto Rico” (henceforth, “document”) by N. Medina Carrillo PhD, dated December 7, 2016.

After the review and acceptance of a second version of the Stage I archaeological survey report, our Office requested an intensive archaeological survey (Stage II) work plan for our review and concurrence prior to its implementation. In letter dated March 2, 2016 we notified the US Department of Veteran’s Affairs of our conditional concurrence with the survey strategy presented in the work plan dated January 2016.

As for the document, this summarizes results from previous identification efforts in the project area: Stage I surveys by Vélez (2005 and 2006) and Sanders (2011), as well as a “summary of the field report of Phase II” by Font (2016). In addition, it mentions (albeit without discussion) the evaluation criteria for inclusion in the National Register of Historic Places and recommendations regarding eligibility of the archaeological sites and structures/buildings identified within the project area. The information in the document used to reach conclusions is mostly based on data of unknown provenance, as we have no record in our files of a “Phase II Cultural Resources Investigation National Cemetery, Morovis, Puerto Rico, Field Work Report, 2016” by A. Font (see page 10 of the document).
Overall, there is little similarity between the previously agreed to field work strategy contained in the January 2016 work plan and that described in the document submitted for our review with no explanation given for the deviation. Furthermore, we found no mention of that work plan in the document.

In general, the report does not provide a substantive basis for the conclusions reached. Considering this, we cannot, at this time, support a determination of “not eligible” for the properties evaluated or findings of effect.

If you have any questions you may contact Archaeologist Marinés Colón, Historic Property Specialist, at (787) 721-3737 or mcolon@prshpo.pr.gov.

Sincerely,

Carlos A. Rubio-Cancela
Acting State Historic Preservation Officer

CARC/BRS/MB/MC
Good morning Glenn.

As soon as we receive the hard copy, we will review the document.

We’ll be in touch.

Cordially,

Marinés Colón-González, M. A.
Historic Property Specialist – Archaeology
Puerto Rico State Historic Preservation Office

From: Elliott, Glenn (CFM) [mailto:Glenn.Elliott@va.gov]
Sent: Thursday, February 23, 2017 10:02 AM
To: Marines Colon Gonzalez <mcolon@prshpo.pr.gov>
Cc: Glucksman, Andrew (glucksman@mabbett.com) <glucksman@mabbett.com>
Subject: RE: Proposed National Cemetery, Department of Veterans Affairs, Morovis, PR

Marinés,
This is the field report, unfortunately it did not get sent along originally. I am hoping this is what you are looking for, if not could we have a call to discuss your needs?
I have also forwarded a hard copy to your office via our consultant (Andrew). Please feel free to give me a call on this project if you have any questions or would like to discuss this situation.

Thank you.

Glenn
Mr. Glucksman:

I just heard your voice mail. My apologies, I was answering another call.

Please find attached letter signed by the Acting SHPO related to the above referenced undertaking. The hard copy was sent last week to Mr. Elliot through postal service.

If you have any questions, do not hesitate to contact us.

Cordially,

Marinés Colón-González, M. A.
Historic Property Specialist – Archaeology
Puerto Rico State Historic Preservation Office