

April 25, 2014

VIA EMAIL

The Honorable Dwight C. Jones  
Mayor  
City of Richmond  
900 E. Broad St., 2<sup>nd</sup> Floor  
Richmond, VA 23219

Dear Mayor Jones:

In response to requests from several City Councilpersons for a response to your Archaeology Initiative, archaeologists living and working in the Richmond region have reviewed the archaeological plan associated with the Revitalize RVA development project and provided a response. A summary of common themes is presented below along with a list of questions for the City Council and Administration's consideration. A complete list of comments can be viewed online at [www.RichmondArchaeology.webs.com/](http://www.RichmondArchaeology.webs.com/). Additionally, the Council of Virginia Archaeologists (COVA) has provided a thorough response to your initiative that reflects many of the comments we received and that are summarized herein.

Common areas of concern for respondents to our inquiry include: Section 106 review; the nature of the public's engagement; how the experts are to be selected; what archaeological protocols are being followed; and what will happen if a significant archaeological discovery impacts the construction schedule.

Several respondents expressed concern that your initiative may be intended to replace a Section 106 review, which as your office is aware, it does not do. Federal agencies, if they are funding any aspect of this project, need to be told of the site's potential archaeological significance and should be provided with all possible information to determine whether they wish to initiate a Section 106 review. Section 106 covers all aspects of a project, including the documentary and historic review process, so parts of this project should not proceed before federal agencies have been given an opportunity to comment.

Several archaeologists commented on the nature of the public's engagement. While they praised the efforts of your administration to open up this process for public viewing, the public's engagement set forth in the initiative appears passive and does not provide a defined role for the public in designing research questions or contributing to the development of the project design. Additionally, there is no stated role for particular descendant communities, such as African American, Native, or veteran communities, who may be important stakeholders in some of the sites impacted by the project. Additionally, the logistics of the public's engagement need to be carefully considered, such as involvement with school systems and budgeting for the time necessary to effectively engage with the public.

Respondents also expressed concern that the plan will be overseen by an expert panel selected by your Office. Alternatively, they expressed a desire for an independent review board empowered to expand the project if a significant discovery necessitates increasing the budget or extending the excavation schedule.

In terms of archaeological procedure, respondents were skeptical of the widespread use of monitoring to identify previously-undiscovered sites during construction. Prehistoric and thin archaeological deposits can easily be destroyed during monitoring activities without being identified. Documentary and historical reviews cannot confidently predict where intact site deposits can be found, so some sort of surveying (Phase I) or 1x1m test pits (Phase II) might be a good intermediate step to identify significant sites and define the parcel's stratigraphy.

We support the Council on Virginia Archaeology's request to be included as a consulting party on this project, along with the Virginia Department of Historic Resources (DHR), The Library of Virginia, and the Historic Richmond Foundation. With the exception of the DHR, the other consulting organizations have significant historical expertise but few if any professional archaeologists on staff. COVA's expertise would fill an important role.

Questions to clarify about the mayor's archaeological initiative:

- Is this project covered under Section 106 of the National Historic Preservation Act?
- What area of the project will this plan cover? Is it only going to cover the baseball stadium footprint, or will it also extend to the associated private development projects, like the proposed grocery store, museum, hotel, and other elements? In other words, what are the parameters of the 'undertaking'?
- If archaeological deposits are uncovered by construction monitoring, what will the criteria be for conducting a Phase III excavation?
- Why are surveying techniques, such as coring, shovel test pits, or geophysical methods not being considered as a strategy to proactively identify intact site deposits after modern fill has been removed?
- What will the procedure be if a large number of human burials or other human skeletal remains are uncovered?
- What is the budget and conservation plan if significant amounts of delicate artifacts (like leather, textile, paper and wood) are recovered from waterlogged environments during the project?

Thank you for the opportunity to comment on this important issue. Should you wish further information or clarification please feel free to contact us via [RVArchaeology@gmail.com/](mailto:RVArchaeology@gmail.com). We look forward to working with you to protect Richmond's treasure trove of cultural and historical resources.

Signed,

Ellen Chapman, MSc in Palaeopathology, Durham University  
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