January 11, 2018

Ms. Sara Holmes Environmental Scientist NV5, Inc. 813 North Dupont Street Wilmington, DE 19805

RE: ER 2017-2210-042-B; FERC: Adelphia Gateway Project (formerly known as IEC Pipeline Modification Project), Northampton, Bucks, Montgomery, Chester and Delaware Counties

Dear Ms. Holmes:

Thank you for providing information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources. Our comments are as follows:

## **Archaeological Resources**

- <u>Parkway Lateral</u> It appears our office has not previously reviewed this component of the project, and because you have consulted with the Delaware SHPO on this, it is our understanding that this component of the project is not located in Pennsylvania. If this is not the case, please identify the locations of any aspects of this component that are located in Pennsylvania.
- <u>Skippack Interconnect</u> We agree with the recommendation for Phase I testing of the temporary and permanent impact areas
- Tilghman Lateral We agree with the recommendation for additional field survey and analysis of utility records and historic maps to document the extent of prior disturbance. If extensive previous disturbance can be documented, in our opinion, no archaeological testing is necessary. If extensive previous disturbance cannot be documented, in our opinion, Phase I testing should be conducted in the archaeologically-sensitive areas between M.P. 1.8 and M.P. 2.0; between M.P. 2.2 and M.P. 2.9; at M.P. 3.51 near Trainer Street; and at M.P. 3.7 near Palmer Street.
- Blowdown Assemblies and Proposed MainLine Valve Locations We agree with
  the recommendation that further background research is necessary to determine
  the need for archaeological testing, although based on the mapping that has been
  provided, the Chester Creek MainLine Valve, the Paoli Pike MainLine Valve, the
  French Creek MainLine Valve, the Cromby Station MainLine Valve and the
  Schuylkill River MainLine Valve each appear to be located in archaeologicallysensitive areas.

## **Above Ground Resources**

- <u>Parkway Lateral</u>: In our opinion, the following properties are **Not Eligible** due to a lack of integrity and/or significance:
  - o Goodley-Armstrong House (Key No. 016772)
  - Lawn Croft Cemetery (Key No. 016773) Although please note, the cemetery may have significance associated within the 1918 Spanish Influenza; however more information would need to be gathered. If the proposed project has no potential to affect the burial mound area, then no additional coordination with our office regarding this property is warranted.
  - Aniline Village (Key No. Pending) Based on the information received, the
    planned community, while significant, appears to have lost integrity, including
    significant alteration of the original plant site, so that the community no longer
    retains integrity to convey an intact cohesive grouping of worker's housing
    constructed in 1918-1919 for the National Aniline and Chemical Company, Inc.
- Quakertown Compressor Station Site: In our opinion, the following properties are Not Eligible due to a lack of integrity:
  - Henry Blank Homestead No. 1 (Heinrich Plank House, Key No. 098089)
  - Henry Blank Homestead No. 2 (1115 Rich Hill Road)
  - o Abraham Housekeeper Homestead (1175 Rich Hill Road)
- Skippack Interconnect Site: We concur that an updated HRSF (that applies the statewide agricultural context) should be prepared for the Kulp Farm (Key No. 140797) and that a new HRSF should be prepared for the Cook Farm (4805 Skippack Pike) that also applies the statewide agricultural context. A copy of the agricultural context and registration requirements for the specific region are available via the agricultural history website here:
  <a href="http://www.phmc.state.pa.us/portal/communities/agriculture/history/index.html">http://www.phmc.state.pa.us/portal/communities/agriculture/history/index.html</a> The HRSF should also include agricultural census data for the property and the township, as well as a site plan with the buildings labeled with approximate construction dates. In addition, as part of the HRSF, please provide historic and current aerial photographs of the property (available via www.pennpilot.psu.edu).
- <u>Tilghman Lateral</u>: We concur that no additional above-ground investigations are warranted for this site.
- <u>Blowdown Assemblies and Proposed Mainline Valve Locations</u>: In our opinion, based on the information received, no additional above-ground investigations are warranted for these locations.

If you need further information concerning archaeological resources, please contact Mark Shaffer at <a href="mailto:mshaffer@pa.gov">mshaffer@pa.gov</a> or (717) 783-9900. If you need further information concerning above ground resources, please contact Emma Diehl at <a href="mailto:emdiehl@pa.gov">emdiehl@pa.gov</a> or (717) 787-9121.

Sincerely,

Douglas C. McLearen, Chief

Dr. Corte

Division of Archaeology and Protection