



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

April 22, 2015

Elizabeth Breiseth
AECOM
525 Vine Street Suite 1800
Cincinnati, OH 45202

RE: BHP ER # 2014-0935-042-CC: Atlantic Sunrise Pipeline Project
Phase 1 Cultural Resources Survey – Volume II Architectural History

Dear Ms. Breiseth:

Thank you for submitting information concerning the above referenced project. The Bureau for Historic Preservation (the State Historic Preservation Office) 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.

Thank you for providing a documented and concise report for our review. We have provided the following comments.

Phase II Submissions

We concur with the methodology proposed for the Phase II Submissions, with the understanding that additional survey and analysis will be required as the locations and design of the support facilities, possible changes in the route and/or permanent access road locations are finalized.

2.1.2 Additional Consulting and Interested Parties

Thank you for the information regarding the outreach to potential consulting parties. Please provide our office with the correspondence for those entities that have requested additional information as related to historic resources.

Please advise us to other outreach efforts or requests for consulting party status by other parties/entities. Please advise us to whether or not the NPS (Captain John Smith Water Trail) has requested formal consulting party status.

2.1.3 Special Land Use Areas Outreach

Thank you for the information regarding the outreach to these entities. Please provide our office with the correspondence for the National Park Service's Appalachian Trail as related to historic resources.

2.4 Cultural resource Concerns filed with FERC

Based upon the Phase I report, additional survey and assessment of effects are ongoing.

3.11 Linear Resources – Railroads and Trolley Line Systems and 3.13 Linear Resources – Navigational Canals

We concur with the level of effort of the Phase I architectural history investigations. Please note, if potential consulting parties, interested parties, agencies, or property owners provide additional information that suggest the potential for effects of the project on these resources, our office may request additional information.

6.1.1 Potential Historic Agricultural Districts

We agree that the potential agricultural districts recommended for further examination as part of the Phase II investigations is warranted.

6.1.2 Archaeological Sites Associated with documented aboveground resources

Please note that the archaeology reviewer may request additional information regarding the above ground resources for a better context to evaluate the archaeological sites.

6.2 Incomplete Survey – Pipeline Facilities

We concur with the recommendations for Phase I survey. Our office is currently discussing updating the survey guidelines to request that the preparer examine (and provide) current and historic aerials to determine loss/addition of buildings and changes in the landscape, research at the tax assessor's office (which may or may not provide a list of the types of buildings on the site and their approximate dates of construction), and a deed search to determine historic ownership/usage and if pertinent (research shows that it has extant historic age agricultural buildings) evaluate the property's agricultural census data (to determine if the property does or does not have average or above average agricultural production).

6.3.1 Compressor, Meter, Regulator, Mainline Valve, and Electrical Substations

We concur with the level of effort and acknowledge that our office will receive and review survey addendums.

6.3.3 Access Roads

We acknowledge that additional survey work is occurring on proposed permanent access roads and will be submitted to our office as an addendum.

6.4 Special Land Use Areas (State Parks, State Forests and State Game Lands - excluding the Appalachian Trail)

We concur with the level of effort and agree that no further survey work or research is needed. However, if the pipeline route changes or above ground facilities are to be constructed in other state forests, parks or game lands that are not noted in this report, additional studies may be required.

6.4.4 Land Trusts

Our office will review the individual farm (BHP Key 077771) for its National Register eligibility.

6.4.5 Military Installations

We acknowledge that view shed analysis will be performed and the results sent to our office.

7.0 Conclusions and recommendations

Thank you for providing the tables and initial effects assessments. Our office will review assessment of effects for the project once the additional survey addendums and the full HRSFs are received (and the resources are evaluated for eligibility).

It is at your discretion if the assessment of effects should be included in the Phase II report or as a separate report (with the understanding that there may be additional resources identified once the route and other component locations have been determined as final).

If you have any questions, please contact Cheryl L. Nagle at 717-772-4519 or chnagle@pa.gov.

Sincerely,



Douglas C. McLearn, Chief
Division of Archaeology & Protection

DCM/cln



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400 North Street
Harrisburg, PA 17120-0093
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21 September 2015

Christopher A. Bergman
AECOM
525 Vine Street, Suite 1800
Cincinnati, Ohio 45202

Re: ER# 2014-0935-042-BB
Phase I Archaeological Survey, Atlantic Sunrise
Pipeline Project, Lancaster, Lebanon, Schuylkill,
Northumberland, Columbia, Luzerne, Wyoming,
Susquehanna, Lycoming, and Clinton Counties,
Pennsylvania

Dear Dr. Bergman:

Thank you for submitting information concerning the above referenced project. The Bureau for Historic Preservation (the State Historic Preservation Office) 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.

This report meets our standards and specifications as outlined in *Guidelines for Archaeological Investigations in Pennsylvania* (BHP 2008) and the Secretary of the Interior's Guidelines for Archaeological Documentation. This report documents recovery of archaeological material from 64 cultural resources, of which 31 are recorded as archaeological sites and 33 are recorded as isolated finds. It is our understanding that this is the first report documenting archaeological survey for this project and that addendum report(s) will be forthcoming when additional archaeological work has been completed. Please, also, address the comments at the end of this letter.

We agree that archaeological sites **36LA1541**, **36LE0536**, and **36WO0112** have the potential to be eligible for inclusion on the National Register of Historic Places. In our opinion, these three sites should be avoided by project activities or Phase II archaeological investigations will be necessary to formally determine eligibility. It is our understanding that these sites will be avoided by project activities and, so long as this remains the case, no further work is necessary at these locations.

We cannot assess the eligibility of archaeological sites **36LA1540** and **36LE0539** since these resources extend outside the project area. It is our opinion, however, that the portions of these two sites that will be impacted by this project would not contribute important information to the eligibility of the sites as a whole. As a result, no further work is necessary with regard to these resources. If the project scope is changed in the area of these sites, additional archaeological work may be necessary.

We agree that archaeological sites **36LA1539, 36LA1552, 36LA1532, 36LA1553, 36LA1527, 36LA1528, 36LA1543, 36LA1544, 36LA1545, 36LA1546, 36LA1547, 36LA1548, 36LA1549, 36LA1538, 36CO0048, 36CO0049, 36LU0322, 36LU0325, 36LU324, 36WO0109, 36WO0105, 36WO0106, 36WO0110, 36WO0107, 36WO0111, and 36SQ0189** are not eligible for inclusion on the National Register of Historic Places. In our opinion, no further archaeological work is necessary with regard to these resources.

We agree that no further work is necessary with regard to the following isolated finds: **36LA/158, 36LA/159, 36LA/161, 36LA/151, 36LA/164, 36LA/165, 36LA/163, 36LA/162, 36LA/167, 36LA/166, 36LA/156, 36LA/152, 36LA/153, 36LA/154, 36LA/157, 36LA/155, 36LE/028, 36LE/029, 36LE/031, 36LE/032, 36CO/010, 36CO/011, 36CO/009, 36CO/007, 36CO/008, 36LU/047, 36LU/046, 36WO/010, 36WO/012, 36WO/013, 36WO/014, 36SQ/023, and 36SQ/024.**

Please address the following comments for the final report and send one bound copy and three digital copies (PDF preferred) on separate CDs of the final report for our files. For all copies, photographs must adhere to the National Register Photo Policy.

- 1) Section 7.2.6 CPL-North, Survey Section 6, pp 195-198. Based on the soil profile from shovel test Hd437, it appears that Holocene soils extends deeper than the depth of shovel testing. Additional geomorphology and, possibly, test unit excavation seems warranted in order to reach the depth of channel lag.
- 2) Section 7.2.7 CPL-North, Survey Segment 7, page 200. Archaeological sites 36WO10, 36WO11, and 36WO51 are located along the steep slopes and rock outcroppings immediately north of SR 92 north of Tunkhannock Creek. It is stated that 36Wo10 and 36Wo51 were visually identified. Please indicate whether or not excavation was performed in this area. Soil stratigraphy at rockshelter sites such as these can be deep and complex and, as a result, geomorphological and archaeological excavation is necessary.
- 3) Page 282, Second Paragraph discusses conclusions regarding site 36La1543. The site discussed is 36La1528.

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21 September 2015
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If you need further information regarding archaeological resources, contact Steven McDougal at (717) 772-0923.

Sincerely,

A handwritten signature in black ink, appearing to read "D. McLearn", written over a horizontal line.

D. of Douglas C. McLearn, Chief
Division of Archaeology &
Protection

DCM/srm



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

December 14, 2015

Vanessa Zeoli
URS
525 Vine Street
Cincinnati, OH 45202

RE: BHP ER 2014-0935-042-RR; Atlantic Sunrise Pipeline Volume II Addendum I – Above Ground Resources

Dear Ms. Zeoli:

Thank you for submitting information concerning the above referenced project. The Bureau for Historic Preservation (the State Historic Preservation Office) 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.

Thank you for the Volume II Addendum I report; we concur that the report is comprised of the survey methodology and reporting as requested by the PA SHPO. We look forward to the submission of the final report.

If you have any questions, please contact Cheryl L. Nagle at 717-772-4519 or chnagle@pa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "D. McLearn".

Douglas C. McLearn, Chief
Division of Archaeology & Protection

DCM/cln



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

8 March 2016

Christopher A. Bergman
URS Corporation
525 Vine Street, Suite 1800
Cincinnati, OH 45202

Re: ER 2014-0935-042-SS

Phase I Archaeological Survey, Addendum 1, Atlantic Sunrise Pipeline Project, Lancaster, Lebanon, Schuylkill, Northumberland, Columbia, Luzerne, Wyoming, Susquehanna, Lycoming, and Clinton Counties, Pennsylvania

Dear Dr. Bergman:

Thank you for submitting 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.

This report meets our standards and specifications as outlined in *Guidelines for Archaeological Investigations in Pennsylvania* (BHP 2008) and the Secretary of the Interior's Guidelines for Archaeological Documentation. As a result of this addendum archaeological survey, 38 archaeological sites and 43 isolated finds were documented. Discussion of these resources follows below.

Archaeological site **36LA1**, which is listed on the National Register of Historic Places, will be avoided in the current project design by the Conestoga River HDD. So long as this remains the case, we agree that no further work is necessary at this site. If the project scope is changed in such a manner that this site will be impacted, then a Phase II investigation and possibly a Phase III mitigation will be necessary.

We agree that the following sites have potential to be eligible for inclusion on the National Register of Historic Places: **36LA1566**, **36LE540**, **36NB196**, **36CO51**, **36WO108**, and **36WO115**. In our opinion, these site should be avoided by project activities or Phase II investigations will be necessary.

Archaeological site **36LA1555** has potential to be eligible for inclusion on the National Register of Historic Places. As currently scoped, the project will cross a disturbed portion of this site with an access road. We agree that this action will have no effect on the site and no further work is necessary. If the project scope is changed in such a manner that this site will be impacted further, then a Phase II investigation may be necessary.

We cannot comment on the National Register eligibility of sites **36LA1531**, **36LA1570**, and **36SC92** since they extend outside of the project area. It is our opinion, however, that the portions of these sites to be impacted by this project would not contribute to site eligibility as a whole and, as a result, no further work is necessary at these sites. Protective measures should be undertaken to ensure that the portions of these sites adjacent to the project area are not inadvertently damaged during construction.

We agree that the following sites are not eligible for inclusion on the National Register of Historic Places: **36LA1589**, **36LA1563**, **36LA1564**, **36LA1567**, **36LA1565**, **36LA1590**, **36LA1568**, **36LA1569**, **36LA1571**, **36LA1572**, **36LA1556**, **36LA1559**, **36LA1558**, **36LA1560**, **36LA1557**, **36LA1561**, **36LE547**, **36LE548**, **36LE549**, **36LE541**, **36LE425**, **36LE546**, **36NB197**, **36CO50**, **36CO52**, **36CO53**, and **36LU335**. No further work is necessary at these sites.

We agree that no further work is necessary at the following isolated finds: **36LA/181**, **36LA/206**, **36LA/182**, **36LA/183**, **36LA/187**, **36LA/185**, **36LA/184**, **36LA/186**, **36LA/207**, **36LA/208**, **36LA/209**, **36LA/190**, **36LA/189**, **36LA/192**, **36LA/191**, **36LA/210**, **36LA/196**, **36LA/195**, **36LA/194**, **36LA/193**, **36LA/173**, **36LA/174**, **36LA/197**, **36LA/175**, **36LA/177**, **36LA/178**, **36LA/179**, **36LA/176**, **36LA/205**, **36LE/040**, **36LE/039**, **36LE/051**, **36LE/036**, **36LE/037**, **36LE/038**, **36SC/019**, **36SC/018**, **36SC/020**, **36NB/011**, **36CO/012**, **36CO/015**, **36CO/016**, and **36CO/013**.

Please address the following typographical error.

- 1) Page 160, second paragraph: this paragraph makes a National Register recommendation for isolated find 36LA/179. This section of the report concerns isolated find 36LA/210.

If you need further information in this matter please consult Steven McDougal at (717) 772-0923.

Sincerely,



Douglas C. McLearn, Chief
Division of Archaeology & Protection

DCM/srm



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

June 27, 2016

Vanessa Zeoli
AECOM/URS
525 Vine Street Suite 1800
Cincinnati OH 45202

ER 2014-0935-042-HHH: Atlantic Sunrise Pipeline Project, FERC, Volume II Addendum 2:
Architectural History

Dear Ms. Zeoli,

Thank you for providing the Volume II Addendum 2 report for our review. We do not have any comments; please continue your survey efforts and submissions as discussed in Volume I and II.

We are requesting that the following correction be made:

2.3.3 Treatment of Pennsylvania Canals

During the April 11, 2016 phone call regarding the Union Canal, the PA SHPO stated that if there is no evidence of above-ground features [within the APE], then it would be lacking too much integrity to be considered a contributing resource to the overall resource and it would not require much in the way of documentation. Per the Volume II Addendum 2 narrative summarizing that conversation, it is stated "integrity of the Union Canal has been compromised enough that it can no longer illustrate any significance..." which is not the correct interpretation of the conversation. The statement can be easily adjusted by adding "in that section."

If you have questions, please contact Cheryl L. Nagle at 717.772.419 or chnagle@pa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. McLearn'.

Douglas C. McLearn, Chief
Division of Archaeology and Protection

DCM/cln



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

14 July 2016

Christopher A. Bergman
URS Corporation
525 Vine Street, Suite 1800
Cincinnati, OH 45202

Re: ER 2014-0935-042-CCC

Phase I Archaeological Survey, Addendum 2, and Phase II Investigations at Archaeological Site 36Co51, Atlantic Sunrise Pipeline Project, Lancaster, Lebanon, Schuylkill, Northumberland, Columbia, Luzerne, Wyoming, Susquehanna, Lycoming, and Clinton Counties, Pennsylvania

Dear Dr. Bergman:

Thank you for submitting 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.

This report meets our standards and specifications as outlined in *Guidelines for Archaeological Investigations in Pennsylvania* (BHP 2008) and the Secretary of the Interior's Guidelines for Archaeological Documentation. As a result of continuing archaeological survey documented in this addendum Phase I report, 11 archaeological sites and 10 isolated finds were found. As well, a Phase II investigation was undertaken to determine National Register eligibility of archaeological site 36Co51. Discussion of these resources follows below.

The Phase II report for archaeological site **36Co51** was well researched and written. We agree that 36Co51 is not eligible for inclusion on the National Register of Historic Places.

Archaeological site **36Cn227** extends outside the project area. We agree that the portion of the site within the project area (to be used as a contractor yard) would not contribute to the eligibility of the site overall and no further work is necessary at this time. If the project scope is changed such that intact portions of this site will be impacted, then a Phase II investigation will be necessary.

We agree that archaeological site **36Wo118** is potentially eligible for inclusion on the National Register. It is our understanding that there will be no earth disturbance at this site. This area will be crossed by heavy machinery; however, timber matting will be used as a protective measure. So long as this remains the case, it is our opinion that no further work is necessary. If the project scope is changed such that this site will be impacted, then a Phase II investigation will be necessary.

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We agree that archaeological site **36Wo121** is potentially eligible for inclusion on the National Register. It is our understanding that the pipeline right-of-way has been shifted to avoid impacts to this site. So long as this remains the case, it is our opinion that no further work is necessary. If the project scope is changed such that this site will be impacted, then a Phase II investigation will be necessary.

We agree that the following sites are not eligible for inclusion on the National Register of Historic Places: **36Wo123, 36Wo120, 36Wo119, 36Wo117, 36Lu336, 36La1597, 36La1598, and 36La1555**. No further work is necessary at these sites.

We agree that no further work is necessary at the following isolated finds: **36LA/213, 36LA/214, 36CO/018, 36CO/020, 36CO/019, 36CO/017, 36LU/052, 36WO/017, 36WO/019, and 36SQ/027**.

If you need further information in this matter please consult Steven McDougal at (717) 772-0923.

Sincerely,

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

Douglas C. McLearn, Chief
Division of Archaeology & Protection

DCM/srm



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

September 19, 2016

Vanessa Zeoli
AECOM/URS
525 Vine Street
Cincinnati OH 45202

ER 2014-0935-042-RRR: Atlantic Sunrise Pipeline, Multiple Townships, Multiple Counties, Phase I Cultural Resources Survey, Volume II: Architectural History, Addendum 3

Dear Ms. Zeoli,

Thank you for submitting 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.

Based upon review of the Addendum 3:

- It is understood that the NPS US Department of Interior, Captain John Smith Chesapeake National Historic Trail requested official consulting party status and was granted such status.
 - We concur with the elucidation of the PA SHPO's comments as denoted in 3.4.2.1
- It is understood that the Project crossing at the Union Canal at present will be open cut construction as stated in 2.3.3. The field photographs identify an existing towpath as well as the presumed location of the in-filled canal prism. It is understood that URS/AECOM will continue to coordinate with our office on the Union Canal as the Project progresses.

If you have questions, please contact Cheryl L. Nagle at 717.772.419 or chnagle@pa.gov.

Sincerely,

Douglas C. McLearn, Chief
Division of Archaeology and Protection



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

21 September 2016

Christopher A. Bergman
URS Corporation
525 Vine Street, Suite 1800
Cincinnati, OH 45202

Re: ER 2014-0935-042-QQQ

Phase I Archaeological Survey, Addendum 3, Atlantic Sunrise Pipeline Project, Lancaster, Lebanon, Schuylkill, Northumberland, Columbia, Luzerne, Wyoming, Susquehanna, Lycoming, and Clinton Counties, Pennsylvania

Dear Dr. Bergman:

Thank you for submitting 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.

This report meets our standards and specifications as outlined in *Guidelines for Archaeological Investigations in Pennsylvania* (BHP 2008) and the Secretary of the Interior's Guidelines for Archaeological Documentation. As a result of continuing archaeological survey written up in this addendum Phase I report, cultural material was recovered from archaeological sites **36Co54** and **36Le554**. We agree with the recommendations of this report that these two sites are not eligible for inclusion on the National Register of Historic Places. In our opinion, no further work is necessary for the portions of the project area tested and documented in this addendum report.

If you need further information in this matter please consult Steven McDougal at (717) 772-0923.

Sincerely,

Douglas C. McLearn, Chief
Division of Archaeology & Protection

DCM/srm