

REQUIREMENT D
CULTURAL RESOURCE NOTICE



October 19, 2016

Mr. Kevin Rucker
Dawood Engineering, Inc.
2020 Good Hope Road
Enola, PA 17025

RE: ER 2016-2194-011-A; COE: Birdsboro Power, LLC Transmission Line; Birdsboro Borough, Exeter Township, and Robeson Township, Berks County; Project Review Form

Dear Mr. Rucker,

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.

Archaeological Resources

Significant archaeological sites are located in or near your project area and others are likely to exist. These resources could be adversely affected by project activities. A Phase I archaeological survey to verify the extent of known sites and to locate other sites is needed to determine their eligibility for listing in the National Register of Historic Places. Guidelines and instructions for conducting Phase I surveys are available on our web site or from our office upon request. The recorded sites in the area are listed below.

P.A.S.S. # 36BK0648; P.A.S.S. # 36BK0649; P.A.S.S. # 36BK0657

Above Ground Resources

A preliminary review of this project indicates that there may be National Register-eligible historic buildings, structures, districts, and objects in the project area. In order to facilitate the review process, project planners must conduct surveys to identify these resources (both previously identified and newly identified) before final plans are developed. For any new proposed structures/lines and/or those proposed structures that will increase in height above 20' from the existing average, please consult our *Guidelines for Projects with Potential Visual Effects in Pennsylvania (September 2014)* available from the "Forms and Guidance" page on our website: <http://www.phmc.pa.gov/Preservation> for instructions, including delineating an Area of Potential Effects, identifying historic properties, and assessing effects.

If you need further information regarding archaeological resources, please contact Mark Shaffer at mshaffer@pa.gov or (717) 783-9900. If you need further information concerning above ground resources, please contact Emma Diehl at emdiehl@pa.gov or (717) 787-9121.

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 and Protection



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

#

December 15, 2016

CHRS, Inc.
Attn: Kevin Quigg, QA/QC Coordinator
395 North Cannon Drive
Lansdale, PA 19446

RE: ER 2016-2194-011-B – COE: Phase I Archaeological Survey, 450 MW Birdsboro Power Project, Borough of Birdsboro and Exeter and Robeson Townships, Berks County

Dear Mr. Quigg:

Thank you for providing this report for 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:

We agree with the recommendation that Phase II archaeological assessment is necessary to evaluate the National Register eligibility of the following sites:

- Birdsboro 1 Site (36BK0941)
- Birdsboro 2 Site (36BK0942)
- Birdsboro 3 Site (36BK0657)

We also agree with the proposed Phase II workplans for these sites,

In our opinion, no further archaeological work is necessary for the portion of the Birdsboro 4 Site (36BK0658) that is located within the current project APE.

Please provide three electronic versions of this report on three separate compact disks. We appreciate your cooperation in this matter.

If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900 or MShaffer@pa.gov.

Sincerely,

#

#

Douglas C. McLearn, Chief
Division of Archaeology and Protection

cc: Nicole Minnichbach, COE, Philadelphia

December 21, 2016

Ms. Maureen McDougall
CHRS, Inc.
395 N. Cannon Avenue
Lansdale, PA 19446

RE: ER 2016-2194-011-C and D; COE: Birdsboro Power LLC Transmission Line; Birdsboro, Exeter, Robson Townships, Berks County; Historic Resources Identification/Reconnaissance Survey

Dear Ms. McDougall,

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.

Above Ground Resources

Thank you for providing the architectural and historical resources investigation report for our review. We offer the following comments.

Properties Determined Eligible

Based on the information provided and available within our files, it is our opinion that the following properties are **Eligible** for listing in the National Register of Historic Places:

- **The Haws Farm** (Key No. Pending, 100 Old River Road) – The property is eligible as a farm under Criterion A in the area of agriculture, for the Fluid Milk Dairying, Poultry, Truck Farming, Nurseries and Specialty Products, a. 1870-1940, as it meets the registration requirements and retains excellent integrity to convey this significance. The proposed boundary would include at a minimum, the current tax parcel and any historically associated acreage that still retains integrity.
- **Redclay Farm** (Key No. Pending, 200 Old River Road) – The property is eligible under Criterion A, in the area of agriculture, for the periods ca. 1780-1870 (Livestock Feeding and Home Dairying in a Diversified System) and ca. 1870-1940, Fluid Milk Dairying, Poultry, Truck Farming, Nurseries, and Specialty Products. Based on the limited information provided in the photographs, the property does retain a possible summer kitchen as well as outbuilding of unknown function that likely supported the dairying operations occurring on the property at the time. The proposed period of significance would begin ca. 1810, the date of the earliest building on the property, and extend to ca. 1940, the end of the agricultural period as the property appeared to retain above-average agricultural data for a number of categories as reported in the 1927 census. The proposed boundary would include at a minimum, the current tax parcel and any historically associated acreage that still retains integrity.

- **Soder Farm** (Key No. Pending, 211 Dennis Drive) – The property is eligible under Criterion A, in the area of agriculture for the periods ca. 1780-1870 (Livestock Feeding and Home Dairying in a Diversified System) and ca. 1870-1940, Fluid Milk Dairying, Poultry, Truck Farming, Nurseries, and Specialty Products. The farm reported above-average yields for the period of 1880; however, it has built features that date to the earlier period; therefore, its significance spans the two periods. Based on the limited information provided in the photographs and given the property's use and site plan, the property likely retains the built environment necessary to convey its significance during the 1880 period. The proposed period of significance would begin ca. 1840, the date of the earliest building on the property, and extend to ca. 1900, as the property appears to have started a decline and/or shift in agricultural production by the 1927 agricultural census reporting. The proposed boundary would include at a minimum, the current tax parcel and any historically associated acreage that still retains integrity.

More Information Requested

We are requesting additional information for the **Samuel Robeson Farm** (Key No. Pending, 634 Schuylkill Road). The lack of agricultural census information should not preclude consideration of the built environment to convey significance, if present. Therefore, we request that the built environment is analyzed within the appropriate context and periods to evaluate its potential significance.

No Additional Information Necessary due to Potential for Effect

We concur with the scope and level of effort utilized to identify historic properties for this project appropriate pursuant to 36 CFR Part 800.4 on the following properties. No further information is required for the remaining properties identified within the report but not specified above. However, if the proposed transmission line route changes to result in direct effects and/or additional above ground features are proposed, additional information in the form of a Historic Resource Survey Form (HRSF) may be required upon consultation with our office.

Assessment of Effect

Please provide a brief memo limited specifically to assessing the potential for effect for the properties determined eligible noted above, as well as the Samuel Robeson Farm (if the evaluation results in an opinion of eligible based on the built environment).

For questions concerning this review and/or for future submittals regarding above ground resources, please contact Emma Diehl at emdiehl@pa.gov or (717) 787-9121.

Sincerely,



Douglas C. McLearn, Chief
Division of Archaeology and Protection

January 27, 2017

Ms. Maureen McDougall
Architectural Historian
CHRS, Inc.
395 N. Cannon Avenue
Lansdale, PA 19446

RE: ER 2016-2194-011-E; COE: Birdsboro Power LLC Transmission Line; Birdsboro, Exeter, Robeson Townships, Berks County; Historic Resources Survey (Samuel Robeson Farm) and Determination of Effects – Above Ground Resources

Dear Ms. McDougall,

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.

Above Ground Resources

Determination of Eligibility

Thank you for providing the requested additional information for the Samuel Robeson Farm (Key No. 203910). Based on the information received and available within our files, we concur with the findings that the **Samuel Robeson Farm is Eligible** for listing in the National Register of Historic Places, under Criterion A, in the area of Agriculture. It is our opinion that the period of significance should begin ca. 1792, after Samuel Robeson acquired the property and subsequently constructed the stone house, and ends ca. 1900, to coincide with the end of the agricultural period, "Early 19th Century – c. 1900, Diversified Grain and Livestock Farming," as the built environment and associated history suggest that significant agricultural pursuits shifted and/or declined and did not follow the local trends of diversified crops, livestock, and poultry. We concur that the proposed National Register boundary would encompass the 21.93-acre tax parcel, historically associated with the farm.

We concur that the scope and level of effort utilized to identify historic properties for this project is appropriate. Our determination of eligibility is based upon the information provided and available in our files for review. If National Register listing for these properties are sought in the future, additional documentation of the property's significance and integrity may be required to both verify this determination of eligibility and satisfy the requirements of the National Park Service (36 CFR Part 60).

Determination of Effect

Based on the information received, we concur that the proposed project will have **No Adverse Effect** on historic properties, which include the National Register-eligible Redclay Farm (Key No. 203902), Samuel Robeson Farm (Key No. 203899), Soder Farm (Key No. 203903), Schuylkill

Navigation Company Canal, Port Carbon to Philadelphia (Key No. 156463), and the Reading Railroad: Main Line, Philadelphia to Port Carbon (Key No. 155649).

If you need further information concerning this review, please contact Emma Diehl at emdiehl@pa.gov or (717) 787-9121.

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 and Protection



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

November 6, 2017

CHRS, Inc.

Attn: Thomas R. Lewis, Director of Archaeological Research
395 N. Cannon Avenue
Lansdale, PA 19446

RE: ER 2016-2194-011-I/ CENAP-OP-R-2016-01011 – Emberclar Power Birdsboro BE, Phase III (Data Recovery) Archaeology Work Plan, Birdsboro Overhead Transmission Line Route, Birdsboro 1 Site (36BK0941) and Birdsboro 2 Site (36BK0942), Exeter Township, Berks County

Dear Mr. Lewis:

Thank you for providing the Phase III (Data Recovery) Archaeology Work Plan for 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:

This office (the State Historic Preservation Office) concurs with the proposed Phase III Archaeology Workplan for the Birdsboro 1 Site (36BK0941) and the Birdsboro 2 Site (36BK0942). It is our understanding that the federal permitting agency, the U.S. Army Corps of Engineers, and the interested Tribes have also concurred with this workplan.

We look forward to reviewing the results of the Phase III investigations of the two sites.

If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900.

Sincerely,

Douglas C. McLearn, Chief
Division of Archaeology and Protection