



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

September 14, 2018

NV5, LLC
Attn: Sara Holmes, Environmental Scientist
813 North Dupont Street
Wilmington, DE 19805

Re: ER 2017-2210-042-C – FERC: Adelpia Gateway Project (formerly IEC Pipeline Modification Project), Northampton, Bucks, Montgomery, Chester and Delaware Counties

Dear Ms. Holmes:

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.

Historic (Above Ground) Resources

We offer the following comments with regards to the proposed project modifications in the following areas that have the potential to affect above ground historic properties:

Parkway Lateral- The Lawn Croft Cemetery (Key No. 016773) was determined Not Eligible in January 2018; therefore, no above ground properties will be affected by the proposed project.

Skippack Interconnect Site- Since the project has been revised in this location to exclude any above ground components, it is our opinion that this proposed project will have No Effect on above ground historic properties.

Pickering Creek Blowdown Assembly- The proposed project in this location is limited to replacement of an existing valve inclusive of any necessary replanting of existing tree and vegetative screening. Therefore, the proposed project will have No Effect on above ground historic properties.

Archaeological Resources

Skippack Interconnect – We agree with the recommendation that no archaeological testing is necessary provided there are no subsurface impacts outside of the existing pipeline trench. We also agree that if the project changes to include excavation in previously undisturbed locations, the need for archaeological testing should be re-evaluated.

Quakertown Compressor Station- We agree with the recommendation that no archaeological testing is necessary.

Tilghman Lateral

1. M.P. 0.3, Transco Meter Station – Goodlley/Allen Farm and Spring Site – The submitted information indicates that Phase I archaeological survey is currently underway. The Phase I report must be submitted electronically to our office via CRGIS. If you need further information on the electronic submittal process, please contact Hannah Harvey at harvey@pa.gov or (717) 346-0616.
2. M.P. 1.8 to M.P. 2.0, Crossing of Marcus Hook/Chichester Creek – We agree with the recommendation that no archaeological testing is necessary for the Horizontal Directional Drilling entry point or the Temporary Work Space.
3. M.P. 2.2 to M.P. 2.9, Crossing of Stony Run – We agree with the recommendation for Phase I archaeological testing in the area between M.P. 2.35 and 2.45 and the associated Temporary Work Space. For the pipeline alignment in the parking lot/access roadway adjacent to Stony Run, we agree with the recommendation for a geomorphological assessment in this area. The submitted information indicates that access to this area will not be granted by the property owner. In our opinion, the geomorphological assessment and subsequent Phase I archaeological testing, if warranted, should be conducted once the pipeline right-of-way has been acquired and prior to construction. We agree with the recommendation for Phase I archaeological testing for the approximately 250-foot long stretch of the pipeline alignment situated on the east side of Stony Run. We also agree with the recommendation for Phase I archaeological testing in the area of M.P. 2.85 to M.P. 2.9 and the associated Temporary Work Space and the proposed Horizontal Directional Drilling point at M.P. 2.9.
4. M.P. 3.15, Crossing of Unnamed Stream – Based on the submitted information, it is our opinion that no archaeological testing is necessary.
5. M.P. 3.55 and M.P. 3.7, Crossing of Harwick Run and Tributary – Based on the submitted information, it is our opinion that no archaeological testing is necessary.
6. M.P. 4.3 to M.P. 4.4, Adjacent to Lamokin Creek – We agree with the recommendation that no archaeological testing is necessary.

Blowdown Assembly and MLV Sites

1. Main Line Valve 1, Concord, Delaware County – We agree with the recommendation that no archaeological testing is necessary.
2. Chester Creek Assembly, Thornbury Township, Delaware County – We agree with the recommendation that no archaeological testing is necessary provided that ground disturbing activity is confined to the existing pipe trench. If new ground disturbing activity is required beyond the width and depth of the existing pipe trench, then we

agree with the recommendation for Phase I archaeological testing. We also agree that no archaeological testing is necessary for the existing access road.

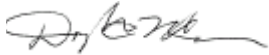
3. Paoli Pike Assembly, East Goshen, Chester County – We agree with the recommendation that no archaeological testing is necessary.
4. Main Line Valve 2, East Whiteland, Chester County – We agree with the recommendation that no archaeological testing is necessary provided that ground disturbing activity is confined to the existing pipe trench. If new ground disturbance is required beyond the width and depth of the existing pipe trench, then we agree with the recommendation for Phase I archaeological testing in the areas to be impacted, including the portion of the access road located immediately south of the valve site.
5. Pickering Creek Blowdown Assembly, Charlestown, Chester County – The submitted information indicates that installation of the blowdown assembly will occur within the existing pipe and valve trench. Based on this, we agree with the recommendation that no archaeological testing is necessary. If the associated access road cannot be protected by matting to ensure there are no below-grade disturbances, then we agree with the recommendation for Phase I archaeological testing in the area of the proposed access road that is located within 300 feet of Pickering Creek.
6. French Creek Blowdown Assembly, East Pikeland, Chester County – We agree with the recommendation that no archaeological testing is necessary for the proposed Blowdown Assembly location, Temporary Work Spaces and access road provided that ground disturbing activity is confined to the existing pipe/valve trench. If new ground disturbance is required beyond the width and depth of the existing trench, then we agree with the recommendation for Phase I archaeological testing for areas to be impacted that are located within 300 feet of French Creek.
7. Cromby Station Blowdown Assembly, East Pikeland, Chester County – We agree with the recommendation that no archaeological testing is necessary.
8. Schuylkill River Blowdown Assembly, East Pikeland, Chester County – We agree with the recommendation that no archaeological testing is necessary for the location of the Blowdown Assembly. For the proposed access road, we agree with the recommendation that no archaeological testing is necessary provided that ground disturbing activity is confined to the area of the existing pipe trench or if the access road will be matted. If new ground disturbance is required beyond the width and depth of the existing trench, then we agree with the recommendation for Phase I archaeological testing for the alignment of the access road.
9. Perkiomen Creek Blowdown Assembly, Perkiomen, Montgomery County – We agree with the recommendation that no archaeological testing is necessary.

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10. East Branch Perkiomen Creek Blowdown Assembly, Skippack Township, Montgomery County – We agree with the recommendation that no archaeological testing is necessary for the proposed Blowdown location and Temporary Work Spaces provided that ground disturbing activity is confined to the existing pipe/valve trench. If new ground disturbance is required beyond the width and depth of the existing trench, then we agree with the recommendation for Phase I archaeological testing. We also agree that no archaeological testing is necessary in the area of the existing access road.

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

Sincerely,



Douglas C. McLearn, Chief
Division of Environmental Review