

ADELPHIA PIPELINE COMPANY, LLC

RESOURCE REPORT NO. 4

Cultural Resources

ADELPHIA GATEWAY PROJECT

January 2018

SUMMARY OF FILING INFORMATION

INFORMATION	Data Sources ^a	Found in Section	To be Filed
Minimum Requirements to Avoid Rejection:			
1. Initial cultural resources consultation and documentation, and documentation of consultation with Native Americans - Title 18 CFR § 380.12(f)(1)(i) & (2)	D, DD	Appendix 1D	N/A
2. Overview/Survey Report(s) – Title 18 § 380.12(f)(1)(ii) & (2)	L, DD	Appendix 4A	N/A
<p>CFR = Code of Federal Regulations N/A = Not applicable ^a D = Applicant L = Field Surveys DD = State Agencies</p> <p>Source: FERC, 2017</p>			

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Appendix 4A Pennsylvania Historic Resource Survey Forms (CONTAINS PRIVILEGED INFORMATION – Provided Under Separate Cover in Volume II)

ACRONYMS AND ABBREVIATIONS

Adelphia	Adelphia Gateway, LLC
APE	Area of Potential Effect
CFR	Code of Federal Regulations
CHRIS	Delaware Cultural and Historical Resource Information System
CRGIS	Pennsylvania Cultural Resources Geographic Information System
Delmarva Station	Delmarva-owned meter station (location of Parkway lateral interconnect facilities)
DHCA	Delaware Division of Historic and Cultural Affairs
FERC	Federal Energy Regulatory Commission
HRSF	Historic Resource Survey Form
Marcus Hook CS	Marcus Hook Compressor Station
MLV	Mainline Valve
NRHP	National Register of Historic Places
Tilghman Station	PECO-owned meter station (location of Tilghman Lateral interconnect facilities)
PHMC	Pennsylvania Historical and Museum Commission
Project	Adelphia Gateway Project
Quakertown CS	Quakertown Compressor Station
Section 106	Section 106 of the National Historic Preservation Act
SHPO	State Historic Preservation Office
THPO	Tribal Historic Preservation Office

4 CULTURAL RESOURCES

Resource Report 4 describes the cultural resources that are known to be or may be present in the Project area and the status of consultations with the Pennsylvania State Historic Preservation Office (SHPO), the Delaware SHPO, and the appropriate Native American tribes. The Project consists of the following primary components: the approximately 4.4-mile 20-inch Mainline; the approximately 84-mile 18-inch Mainline consisting of the Southern Segment and the Northern Segment that will both transport solely natural gas; two new compressor stations (the Marcus Hook CS and the Quakertown CS); two laterals, including an approximately 0.25-mile 16-inch pipeline lateral (the Parkway Lateral) and an approximately 4.5-mile 16-inch pipeline lateral (the Tilghman Lateral); four existing meter and regulator (M&R) facilities that do not require any modifications and accordingly do not have any environmental impacts for review in this resource report; eight new M&R facilities at receipt and delivery interconnects located along the 18-inch Mainline and the laterals; eight new blowdown assemblies located at existing mainline valves; one new mainline valve; and use of an existing disturbed site as a wareyard.

Consultation with the SHPOs and appropriate tribes as well as cultural resource surveys for the Adelpia Gateway Project (Project) are ongoing. The results of the consultation process will be used to direct and inform cultural field surveys conducted for the Project, if such surveys are requested by the consulting agencies/tribes. The scope of this resource report is limited to include only the immediate area of the Project Sites where cultural resources have the potential to be impacted. Therefore, the existing 18- and 20-inch-diameter pipelines are not included in this report, because no Project activities would occur along these components (see Resource Report 1 – *General Project Description*).

4.1 INTRODUCTION

Section 106 of the National Historic Preservation Act (Section 106), as amended, requires the lead federal agency with jurisdiction over a federal, federally-assisted, or federally-licensed project to consider potential impacts on historic properties prior to starting construction. A historic property is defined as any prehistoric or historic district, archaeological site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (NRHP). The process for identifying cultural resources that could be affected by a proposed project is identified in 36 Code of Federal Regulations (CFR) 800. These regulations include steps for evaluating the eligibility of potentially historic properties for listing in the NRHP; assessing the potential effects of a project on historic properties; and consultation regarding methods to avoid, reduce, or

mitigate adverse effects on NRHP listed properties. Adverse effects could include, but are not limited to the following:

- Destruction or alteration of all or part of a property;
- Isolation from, or alteration of a property from its surrounding environment;
- Introduction of visual, audible, or atmospheric elements that are out of character with the property or that alter its setting;
- Transfer or sale of a federally owned property without adequate conditions or restrictions regarding preservation, maintenance, or use; and
- Neglect of a property resulting in its deterioration or destruction (ACHP, 2004).

Adelphia used a three-step process to identify and evaluate known cultural resources in proximity to the Project area:

- (1) Review data from the Pennsylvania Historical and Museum Commission (PHMC), the Pennsylvania Cultural Resources Geographic Information System (CRGIS), and the Delaware Cultural and Historical Resources Information System (CHRIS);
- (2) Review site conditions through field visits (or aerial photography when field visits are not possible); and
- (3) Prepare a cultural resources summary that identifies previous cultural resource surveys conducted and any previously identified cultural resources, such as archaeological sites and historical structures, within the limits of the Project area.

Adelphia's review identified ten known historic properties and two previously recorded archaeological sites within proximity to the Project area. Table 4.1-1 lists previously recorded historic properties within or in proximity to the Project, and table 4.1-2 lists previously recorded archaeological sites within or in proximity to the Project.

Adelphia's initial review did not include the proposed Tilghman Lateral and its associated M&R facilities, the Skippack Meter Station or the new MLV and blowdown assembly sites. Adelphia has reviewed these sites for cultural resources and is in the process of coordinating with the Pennsylvania SHPO, accordingly.

**Table 4.1-1
Previously Recorded Historic Properties within or in Proximity to the Adelpia Gateway Project**

SHPO Number	Property	Relation to Project Area	Status
Marcus Hook Compressor Station, Wareyard, Delivery Laterals, and Associated M&R Facilities			
DE CRS # D00101.17 1 and PA Key # 110780	Delaware-Pennsylvania Boundary Historic District – arc boundary between the two states marked by monuments every half mile	The Parkway Lateral runs close to and along the district along and northwest of Parkway Ave.	NRHP-listed
DE CRS # 12130 and 12161	Aniline Village/Penn-Del City – workers row housing complex built by the National Aniline Chemical Company in 1918-1919 and late 1930s; located in both Delaware and Pennsylvania (only the Delaware section has been surveyed)	The complex is immediately adjacent to and northwest of the Marcus Hook Compressor Station. The Parkway Lateral passes in front of (along West Ridge Rd.) and through (along Parkway Ave.) this historic development.	Potentially eligible as a historic district
PA Key # 016773	Lawn Croft Cemetery – 90-acre cemetery established in 1904; includes granite monoliths and gates, dwelling/office (see Olcott/White House, below), and carriage barn/cemetery garage	The property is immediately adjacent to the Parkway Lateral.	Insufficient information to evaluate NRHP eligibility
PA Key # 016772	Olcott/White House – within Lawn Croft Cemetery; Carpenter Gothic dwelling built circa 1876; now used as cemetery office	The property is within view of the Marcus Hook Compressor Station and Tilghman Lateral (about 500 feet from the Marcus Hook Compressor Station and about 400 feet from Tilghman Lateral, at its nearest point).	Insufficient information to evaluate NRHP eligibility
PA Key # 111801	Philadelphia, Wilmington and Baltimore Railroad Historic District	The district is immediately adjacent to and southeast of the Marcus Hook Compressor Station.	Eligible for NRHP listing
PA Key # 200549	Sun Oil Company Marcus Hook Refinery Historic District	The property is immediately adjacent to and northeast of the Marcus Hook Compressor Station.	Not eligible for NRHP listing
Quakertown Compressor Station and Associated M&R Facilities			
098089	Heinrich Plank (Henry Blank) Farmstead – includes house (stone, built 1827) and bank barn (stone and frame)	The property abuts the eastern end of the proposed Quakertown Compressor Station, with the house approximately 500 feet to the southeast.	Surveyed in 1991 and recommended as potentially eligible; Insufficient information to evaluate NRHP eligibility

CRS = Cultural Resource Survey

Table 4.1-2				
Previously Recorded Archaeological Sites within Proximity to the Adelpia Gateway Project				
PA Site Number	Name	Site Type and Location	Other Information	Source
Quakertown Compressor Station and Associated M&R Facilities				
36BU00 35	Rich Hill Rock Shelter	Rock shelter, hillslope; 0.4 mile east of Project area	Yielded Early and Late Woodland ceramics, steatite bowl fragments, lithics.	Collector interview
36BU02 13	Gray & Pape Field #93-53-7	Surface scatter, upland flat; 0.4 mile east of Project area	N/A	Kozarek, Sue Ellen et al., 1994

4.2 AREA OF POTENTIAL EFFECT

The APE for cultural resources is the “geographic area or areas within which an undertaking may directly or indirectly cause changes in the character of or use of historic properties, if any such properties exist” (36 CFR 800.16(d)) (ACHP, 2004). The APE for direct effects of a project is limited to the area of potential ground disturbance. Project-related ground disturbance (and therefore the direct APE) would be limited to the following Project Sites: the Marcus Hook CS and wareyard; Parkway Lateral and associated M&R facilities; Tilghman Lateral, its delivery points, and associated M&R facilities; the new MLV and blowdown assembly sites; the Skippack Meter Station, Martins Creek Station, and the Quakertown CS and associated M&R facilities. Maps of the proposed work area at these Sites are provided in appendix 1A.

The indirect APE includes aboveground historic architectural and landscape resources within the line-of-sight of the direct APE and may also include other portions of the same parcels used as part of the Project. Maps of the proposed indirect APE for the majority of the Project were submitted with the original initiation of consultation letters to the Pennsylvania and Delaware SHPOs. Adelpia is continuing to consult with the Pennsylvania SHPO on the proposed MLV and blowdown assembly sites, the Skippack Meter Station, and the Tilghman Lateral and associated M&R facilities.

4.3 AGENCY CONSULTATION

4.3.1 State Historic Preservation Office Consultation

Adelpia initiated Section 106 consultation with the Pennsylvania and Delaware SHPOs on August 29, 2017. The initiation of consultation documents include maps showing the areas of

potential effect (APE) for archaeology and historic architecture, tables listing previous surveys and previously identified archaeological sites and historic architectural resources, discussions dealing with archaeological potential and potentially significant historic architectural resources within the Project APEs, and recommendations as to the need for further cultural resource investigations. A revised consultation letter was sent to the Pennsylvania SHPO on December 28, 2017 to include the Tilghman Lateral, the Skippack Meter Station, and the new MLV and blow down assemblies in the Project scope.

The Delaware SHPO responded to the Applicant's submission on September 1, 2017. The Cultural Resource Specialist requested that a field meeting be held to discuss potential Project impacts to two resources that were identified within Adelphia's submission: Aniline Village, which the Delaware SHPO views to be a potential historic district; and Delaware-Pennsylvania Boundary Monument 21½, a contributing element within the Delaware-Pennsylvania Arc Boundary Historic District, which is listed on the NRHP. Adelphia representatives met with the Cultural Resource Specialist in the field on September 19, 2017 to view and discuss these resources. The meeting resulted in the following conclusions and agreements:

- **Aniline Village** – It was agreed to treat this resource as an eligible historic district. The Project would not impact any of the district's buildings or trees, and construction would occur only within existing roadways. No archaeological or historic architectural survey will be required.
- **Delaware-Pennsylvania Boundary Monument 21½** – It was agreed that the monument would not be impacted during construction. Adelphia agreed to clearly mark the boundary and install a protective enclosure (of a type to be agreed upon by the Applicant, the Delaware SHPO, and the landowner) prior to construction to ensure avoidance. No further cultural resource survey will be required.

The Pennsylvania SHPO responded to the Applicant's original submission on September 26, 2017. The following summarizes results of the Pennsylvania SHPO's review for each of the proposed Project Sites:

- **Marcus Hook CS, Parkway Lateral, and associated M&R facilities** – No archaeological survey is required. An investigation of Delaware-Pennsylvania Boundary Monument 21½ within the Delaware-Pennsylvania Arc Boundary Historic District is required. Adelphia is required to complete Historic Resource Survey Forms (HRSF) for the Lawn Croft Cemetery (to include the Olcott/White

House) and Aniline Village/Penn-Del City. The SHPO requested clarification of the status of the Sun Oil Company Marcus Hook Refinery.

- **Quakertown CS and associated M&R facilities** - No archaeological survey is required. HRSFs are required for the Heinrich Plank (Henry Blank) Farmstead, the Plank Farmstead (1115 Rich Hill Road) and the Housekeeper/Frank/Clymer Farmstead (1175 Rich Hill Road).
- **Martins Creek Station** – No archaeological surveys or aboveground investigations are required.

Adelphia complied with SHPO recommendations and submitted its findings to the Pennsylvania SHPO with its revised consultation letter (see appendix 1D, *Agency Correspondence*). Adelphia will respond to additional SHPO responses regarding the Survey Report and consultations in general, as they are received. Adelphia will file all future communications between itself and the SHPO with the FERC, as they occur.

4.3.2 Native American Coordination

Adelphia initiated coordination via certified letter on August 28, 2017 with seven federally recognized Native American groups that have a historical connection and demonstrated interest in the Project area. Reference was made to the Pennsylvania Department of Transportation's *Interim Guidance on Consulting with Indian Tribes* during the preparation of the initiation of consultation documents (PennDOT, no date). The letters included Project maps, the results of the preliminary investigation, and outlined the proposed archaeological surveys that may be conducted in order to identify cultural resources. The revised consultation letter was also sent to the same seven tribes to include the Tilghman Lateral and associated M&R facilities, Skippack Meter Station, and new MLV and blowdown assemblies in the Project scope. Table 4.2-1 identifies the Native American tribes that were contacted in order to coordinate further cultural resource investigations. Native American tribes with a demonstrated interest in the Project area were identified from a list provided by the Pennsylvania Department of Transportation (PennDOT, 2017). The PHMC does not maintain contact lists for federally recognized Native American tribes. The Delaware SHPO confirmed on September 22, 2017, that the list also covers all tribes that would be associated with the Delaware portion of the Project area (see appendix 1D).

As of December 2017, Adelphia has received a response from one tribe, the Delaware Nation, which responded to the Applicant's consultation letter on October 3, 2017. The Delaware agreed with the Applicant's findings and recommendations and asked that the Delaware Nation

be kept current with the Project's progress. Adelpia will comply with this request. No other responses have been received from the Native American Tribes contacted. Adelpia will attempt to contact the Native American tribes that do not respond to consultation letters by both email and telephone.

Table 4.2-1 Native American Coordination	
Native American Tribe	Coordination Status
Absentee-Shawnee Tribe of Oklahoma	Representative(s) identified. Letter sent via Certified Mail with Return Receipt Request.
Cayuga Nation	Representative(s) identified. Letter sent via Certified Mail with Return Receipt Request.
Delaware Nation	Representative(s) identified. Letter sent via Certified Mail with Return Receipt Request. Response received 10/03/17, which stated concurrence with Adelpia's findings and recommendations and asked to be kept current with Project.
Delaware Tribe	Representative(s) identified. Letter sent via Certified Mail with Return Receipt Request.
Eastern Shawnee Tribe of Oklahoma	Representative(s) identified. Letter sent via Certified Mail with Return Receipt Request.
Oneida Nation of Wisconsin	Representative(s) identified. Letter sent via Certified Mail with Return Receipt Request.
Onondaga Nation	Representative(s) identified. Letter sent via Certified Mail with Return Receipt Request.

4.4 ADELPHIA RECOMMENDATIONS

Adelpia recommended in its initiation of consultation letters that field surveys be conducted for the following aboveground cultural resources:

- Boundary Monument 21 ½;
- Aniline Village/Penn-Del City;
- Lawn Croft Cemetery;
- the Heinrich Plank Farmstead.

Reference was made to the following SHPO guidelines during preparation of the initiation of consultation documents: *Cultural Resource Management in Pennsylvania: Guidelines for Archaeological Investigations* (Pennsylvania Historical and Museum Commission, 2008); *Guidelines for Architectural Investigations* (Pennsylvania Historical and Museum Commission, 2014), *Survey Guidelines for Pipeline Projects—Above Ground Resources* (Pennsylvania Historical and Museum Commission, 2013); *Archaeological Survey in Delaware* (Delaware Division of Historical and Cultural Affairs, 2015a); and *Architectural Survey in Delaware* (Delaware

Division of Historical and Cultural Affairs, 2015b).

4.5 OUTSTANDING SURVEYS

Historical architectural surveys recommended by the Pennsylvania SHPO in response to Adelphia's original consultation letter (see section 4.2.1) were completed in December 2017. The results are included in Adelphia's Survey Report (see appendix 4A). Adelphia sent a revised consultation letter to the Pennsylvania SHPO reflecting minor changes in route and facilities from the original letter. Adelphia will update findings as required resulting from additional SHPO response. Should the Pennsylvania SHPO or Native American Tribes recommend additional surveys in response to the revised consultation letter, Adelphia will file the results of these surveys with the FERC upon completion.

4.6 PLAN FOR UNANTICIPATED DISCOVERIES

Adelphia is preparing an *Unanticipated Discoveries Plan* that will establish procedures to be followed if previously unidentified cultural resources, such as archaeological sites, historic features, human remains, and/or paleontological resources (fossils) were encountered during construction of the proposed Project. The Unanticipated Discoveries Plan will be provided to the FERC and SHPOs as part of Adelphia's Survey Report. This plan will be developed in coordination with the Pennsylvania and Delaware SHPOs and any Native American tribes that request continuing consultation.

4.7 REFERENCES

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