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PRESERVATION SERVICES

Ms. Tina Blankenship
Illinois State Historic Preservation Office
Illinois Department of Natural Resources
Review & Compliance-Archaeology Division
One Natural Resources Way
Springfield, Illinois 62702

Re: **Summary of Cultural Resources Consultation (to date), and Request for Concurrences Spire STL, LLC. Spire STL Pipeline Scott, Greene, and Jersey Counties, Illinois**

IHPA REVIEW
H/A _____
AC Concur P 11/15/17
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Dear Ms. Blankenship:

Spire STL Pipeline LLC (Spire), a wholly owned subsidiary of Spire Inc., is nearing the end of planning stages of the Spire STL Pipeline (Project), located in Scott, Greene, and Jersey Counties in Illinois and in St. Charles and St. Louis Counties in Missouri. Spire is seeking authorization for the undertaking from the Federal Energy Regulatory Commission (the FERC), pursuant to Section 7(c) of the Natural Gas Act, to construct and operate the proposed Spire STL Pipeline Project (Project) located in Scott, Greene, and Jersey Counties, Illinois, and St. Charles and St. Louis Counties, Missouri. The total length of the Project pipelines will be approximately 65 miles, of which approximately 45.35 miles are in Illinois.

Based on a November 3, 2017 e-mail discussion with your office, GAI Consultants, Inc. (GAI) is submitting this letter to summarize the whole of cultural resources submittals for the Project that were provided to your office, to date.

The cultural resources studies discussed herein were conducted in accordance the National Environmental Policy Act, Section 106 of the National Historic Preservation Act of 1966, as amended, the guidelines developed by the Advisory Council on Historic Preservation published November 26, 1980; and the amended *Procedures for the Protection of Historic and Cultural Properties* as set forth in 36 CFR Part 800. These investigations were also conducted pursuant to the FERC's 2002 and revised 2017 *Guidelines for Reporting on Cultural Resources for Pipeline Projects*. Methods conformed to guidelines for conducting cultural resources investigations established by the Illinois Historic Preservation Agency (IHPA).

At the request of the FERC, Spire has been asked to provide clarification regarding review and concurrence from your office pertaining to cultural resource reports submitted throughout the course of the Project's design phase. These submittals include:

1. **Post-review Discovery (36CFR800.13):** *Unanticipated Discoveries Plan for Cultural Resources* (Glenn 2016); submitted October 28, 2016 and resubmitted to your office on April 10, 2017
2. **Initial Phase I Report:** *Technical Report, Phase I Archaeological Survey and Architectural Resources Survey* (Scuoteguazza et al., 2017); submitted January 25, 2017

3. **Addendum I:** *Technical Report – Addendum I, Phase I Archaeological Survey* (Scuoteguazza et al., 2017); submitted April 21, 2017
4. **Addendum II:** *Technical Report – Addendum II, Phase I Archaeological Survey* (Scuoteguazza et al., 2017); submitted July 14, 2017
5. **Phase II Evaluation:** *Technical Report, Phase II Archaeological Testing at Site 11JY751* (Scuoteguazza 2017); (submitted on July 14, 2017)
6. **Phase II Evaluation:** *Technical Report, Phase II Archaeological Testing at Site 11JY765* (Scuoteguazza and Munford 2017); (submitted on July 14, 2017)
7. **Addendum III:** *Technical Report – Addendum III, Phase I Cultural Resources Survey* (Scuoteguazza and Hood, 2017); submitted September 29, 2017

The initial Phase I cultural resources report (submitted January 25, 2017) documented work conducted between October and December 2016, including discovery of 113 archaeological sites, 57 isolated finds, and 31 historic and architectural resources. One of the archaeological resources was previously recorded (11GE18), while the remaining were newly identified during Phase I survey for the Project. GAI recommended that 103 of the 113 archaeological sites and all 57 isolated finds are not eligible for listing in the National Register of Historic Places (NRHP). GAI further recommended that the remaining 10 archaeological sites are potentially eligible for NRHP listing. These are: 11JY700, 11JY680, 11JY661, 11ST613, 11GE758, 11GE757, 11GE789, 11JY698, 11JY699, and 11GE773. Two of the potentially eligible sites (11GE789 and 11GE773) were located within the Project study area but outside of the proposed construction right-of-way (ROW), and were therefore not going to be impacted by planned construction activities. As such, GAI recommended no further work for these two sites. GAI recommended that impacts to the remaining eight potentially eligible sites should either be avoided or Phase II NRHP eligibility evaluations be conducted.

Your office concurred with these recommendations in a letter dated June 22, 2017 (Attachment 1). However, as stated in the subsequent Phase I Addendum I survey report (submitted April 21, 2017), which discussed Project activities from February to March 2017, design changes were implemented to avoid these potentially eligible sites, and none of the 10 was to be impacted by the Project.

In addition to clarifying design changes that occurred since the January report, Addendum I also presented 40 newly identified archaeological resources, including 34 sites and six isolated finds. In that report, GAI recommended that all of the sites were not eligible for NRHP listing, with the exception of Sites 11GE757 and 11GE758, which we recommend as potentially eligible. However, based on additional design changes, the current Project avoids both sites, as they are now located outside the proposed construction ROW. A discussion of this avoidance was included in the Phase I Addendum I Report. An e-mail discussion occurring on July 20, 2017 indicated that the June 22, 2017 letter (above) included concurrence for this April addendum (Attachment 2). However, the FERC is requesting confirmation that your office specifically concurs with the findings of this April report (Addendum 1).

Addendum II (July 2017) also provided a discussion for studies that occurred between March and June 2017, which encountered 28 archaeological sites and one isolated find. Three of these sites were recommended as potentially eligible for NRHP listing—11JY751, 11JY765, and 11JY778, while the remaining resources were recommended as not eligible. An avoidance measure to Site 11JY778 via timber matting was discussed with your office on May 23, 2017 (Attachment 3). This measure was included in the Addendum II report, and formal evaluation was therefore not conducted at this location.

Sites 11JY751 and 11JY765 could not be avoided by Project activities, and both were subsequently subjected to formal (Phase II) NRHP evaluation. Reports of these evaluations were also submitted to your office on July 14, 2017. Evaluation indicated that the portion of Site 11JY751 that lies within the Project area does not contribute to the overall significance of the site and that no further considerations are needed, as designed. Evaluation also indicated that Site 11JY765 does not meet NRHP criteria for listing and does not therefore need to be avoided or mitigated. Verbal (e-mail) approval was provided by your office on October 4, 2017 (Attachment 4), but formal concurrence letters have not yet been received for these two site evaluations.

Finally, Phase I Addendum III report was submitted to your office on September 29, 2017. This report pertained to investigations occurring in August 2017, including discovery of 14 archaeological sites and

three isolated finds. One of the sites was previously recorded—11JY666. Twelve of the sites and all of the isolated finds were recommended as not eligible for NRHP listing, while two of the sites (11JY789 and 11JY799) are considered to be potentially eligible. Potential avoidance measures are being considered for 11JY789. Once land access is obtained, additional Phase I studies will occur on a western reroute to avoid the site. If a reroute avoidance is not feasible, Phase II evaluation is planned. Site 11JY799 is within the study limits but beyond the Project's construction ROW, so no further considerations are planned at this location, as designed.

To summarize, Spire is specifically requesting your concurrence on the following items:

1. **Post-review Discovery (36CFR800.13):** *Unanticipated Discoveries Plan for Cultural Resources* (Glenn 2016); submitted October 28, 2016 and resubmitted April 10, 2017

Please provide your concurrence that this plan is suitable to address accidental discoveries of cultural resources during pipeline construction or maintenance, per 36CFR800.13 (*Post Review Discoveries Clause*)

2. **Initial Phase I Report:** *Technical Report, Phase I Archaeological Survey and Architectural Resources Survey* (Scuoteguazza et al., 2017); submitted January 25, 2017

The attached letter dated June 22, 2017 provides your concurrence for the recommendations contained within the report. However, please note that avoidance of all ten potentially eligible resources was achieved via design changes (discussed in Addendum I).

3. **Addendum I:** *Technical Report – Addendum I, Phase I Archaeological Survey* (Scuoteguazza et al., 2017); submitted April 21, 2017

Please provide your concurrence with the recommendations contained within this report, while noting that sites 11GE757 and 11GE758 will now be avoided, as discussed in Addendum I. An e-mail discussion occurring on July 20, 2017 indicated that the previous clearance letter (June 22, 2017) included this concurrence. However, as requested by the FERC, please confirm that your office also specifically concurs with the findings of (Addendum 1).

4. **Addendum II:** *Technical Report – Addendum II, Phase I Archaeological Survey* (Scuoteguazza et al., 2017); submitted July 14, 2017

Please provide your concurrence with the recommendations contained within this report, including the proposed avoidance measure to Site 11JY778 via timber matting, as discussed with your office on May 23, 2017 (Attachment 2).

5. **Phase II Evaluation:** *Technical Report, Phase II Archaeological Testing at Site 11JY751* (Scuoteguazza 2017); (submitted on July 14, 2017)

Please provide your concurrence that the portion of Site 11JY751 located within the Project's construction limits is unlikely to contribute to the overall significance of the site, and that no further investigations are required, as designed. See e-mail approval in Attachment 3.

6. **Phase II Evaluation:** *Technical Report, Phase II Archaeological Testing at Site 11JY765* (Scuoteguazza and Munford 2017); (submitted on July 14, 2017)

Please provide your concurrence that site 11JY765 does not meet criteria for listing on the NRHP, and that it therefore requires no further consideration. See e-mail approval in Attachment 3.

7. **Addendum III:** *Technical Report – Addendum III, Phase I Cultural Resources Survey* (Scuoteguazza and Hood, 2017); submitted September 29, 2017

Please provide your concurrence with the recommendations contained within this report

Also, please note that, at the time of the September 29, 2017 submittal, 256 archaeological resources, including 189 sites and 67 isolated finds, were reported on and submitted to your office in the above-

mentioned documents. Since the September 29, 2017 submittal, further studies have been conducted in areas where rerouting has occurred and additional rerouting has altered the APE. This information will be presented in a fourth addendum report to be submitted to your office in November 2017.

Thank you for your attention to these matters. Should you have questions or require additional information, feel free to contact me at 412.399.5188 or via e-mail at e.scuoteguazza@gaiconsultants.com.

Sincerely,
GAI Consultants, Inc.



Eric P. Scuoteguazza, M.A., M.B.A., RPA
Senior Manager, Cultural Resources



Robin Weissert, CEP
Assistant Environmental Manager

CONCUR

By: Rachel Leibowitz
Deputy State Historic Preservation Officer

Date: 11-15-17

EPS/RW:eps

- Attachments:
- 1) Previous IHPA Clearance Letter (June 22, 2017)
 - 2) IHPA E-mail Regarding Addendum I Concurrence (July 20, 2017)
 - 3) Telephone Log with IHPA on Site Avoidance Measures (May 23, 2017)
 - 4) IHPA E-mail Regarding Phase II Review of 11JY751 and 11JY765 (October 4, 2017)