APPENDIX C: PHMC CORRESPONDENCE

## Appendix C: PHMC Correspondence

The following PHMC correspondence is provided in this appendix:

3/3/2016 King of Prussia Rail-Norristown High Speed Line AA / DEIS Section 106 Coordination Conference Call/Webinar Summary

3/7/2016 PHMC to AECOM

Re: ER 2013-1006-091-I; FTA: King of Prussia Rail Project; Upper Merion

Township, Montgomery County; APE Report

# King of Prussia Rail Norristown High Speed Line AA / DEIS Section 106 Coordination Conference Call/Webinar Summary

**Date:** March 3, 2016

Time: 1:30 PM

**Location:** Conference Call/Webinar

### **Participants**

Emma Diehl PHMC
Tony Cho FTA
Dan Koenig FTA
Fritz Ohrenschall SEPTA
Kate Farnham AECOM
Leslie Roche AECOM

#### **Summary of Discussion**

- Area of Potential Effects (APE) Report Historic Architecture
  - Emma Diehl stated that she has reviewed the APE Report for the project and agrees with the APE boundary for historic architecture. She will shortly prepare a concurrence letter to FTA Region 3.
- Resources for Survey
  - Kate Farnham reviewed the 12 properties within the APE that appear to warrant survey. The following approach for each property was agreed among attendees to be appropriate (numbering coincides with resources list provided to attendees):
    - 1. Quarry property abbreviated Historic Resource Survey Form (HRSF)
    - 2. Philadelphia and Reading Railroad AECOM to review the file of the Chester Valley Railroad to see if it was actually part of the Philadelphia and Reading Railroad line that is also mapped in CRGIS in this location. If it was and its ability to contribute to that larger line is assessed in the previous finding, then further study of the Philadelphia and Reading Railroad in this location for KOP Rail is not necessary. If it is clear that Chester Valley Railroad was not part of the Philadelphia and Reading, then a full HRSF for the section of the Railroad within the APE would be required.
    - 3. <u>Brandywine Village District</u> Full HRSF. AECOM will research the park. If it was part of the original subdivision for Brandywine Village, the park will be included in the form.
    - 4. <u>King of Prussia Arms Apartments</u> Abbreviated HRSF is adequate provided the property has no association with public housing.
    - 5. Allendale Road Farmhouse Abbreviated HRSF
    - 6. Wills Building Abbreviated HRSF
    - Gatti & Morrison Building Abbreviated HRSF
    - 8. Southern W&S of PA Abbreviated HRSF
    - ProMetrics Abbreviated HRSF
    - 10. <u>Arkema Campus</u> Full HRSF. If property access is not possible Emma advised that using historical aerials as well as observation from publicly accessible properties would be adequate. AECOM is also to review other Arkema campuses and assess the significance of this one within their overall operation.

- 11. <u>Devon International</u> Abbreviated HRSF
- 12. American Baptist Mission Center Full HRSF
- At Kate's request, Emma indicated she would look for an example context narrative for an office park that PHMC feels we could use as a model.
- Archaeology Phase 1A Survey Leslie noted that the survey is underway with the limit of disturbance (LOD) serving as the archaeology APE. AECOM expects to submit the Phase 1A Survey Report and architectural survey forms at the same time. AECOM will advise attendees when to expect those documents.

March 7, 2016

Ms. Terry Garcia Crews ATT: Tony Cho FTA, Region III 1760 Market Street, Suite 500 Philadelphia, PA 19103-4124

RE: ER 2013-1006-091-I; FTA: King of Prussia Rail Project; Upper Merion Township, Montgomery County; APE Report

Dear Ms. Garcia Crews,

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 (NHPA) 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**

The information you provided indicates a Phase IA archaeological survey will be completed for the Likely Preferred Alternative. Please provide a copy of the Phase IA report to our office for review and comment.

#### **Above Ground Resources**

Thank you for providing an Area of Potential Effects (APE) Report for the above-referenced project. Based on the information received as well as discussed in our March 3, 2016 conference call, we concur with the proposed APE and survey methodology for above ground resources. Please be sure to consult relevant guidelines and appropriate historic contexts for completion of the full HRSFs. In addition, please include historic and current aerial comparisons as appropriate in addition to the required attachments (USGS, photographs, site plans).

As captured in the March 3, 2016 meeting minutes, the following properties will be surveyed:

- Quarry Property abbreviated Historic Resource Survey Form (HRSF)
- Philadelphia & Reading Railroad contingent upon additional research into previous finding regarding the Chester Valley Railroad
- Brandywine Village District –full HRSF
- King of Prussia Arms Apartments abbreviated HRSF (provided that apartment complex has no association with public housing)
- Allendale Road Farmhouse abbreviated HRSF
- Wills Building abbreviated HRSF
- Gatti & Morisson Building abbreviated HRSF
- Southern W&S of PA abbreviated HRSF
- ProMetrics abbreviated HRSF

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- Arkema Campus full HRSF
- Devon International abbreviated HRSF
- American Baptist Mission Center full HRSF

Please be sure to consult relevant guidelines for completion of all forms (available from our website) and appropriate historic contexts for completion of the full HRSFs. In addition, please include historic and current aerial comparisons as appropriate in addition to the required attachments (USGS, photographs, site plans) for each of the full HRSFs.

For questions concerning archaeological resources, please contact Mark Shaffer at <a href="mshaffer@pa.gov">mshaffer@pa.gov</a> or (717) 783-9900. For questions concerning above ground resources, please contact Emma Diehl at <a href="mailto:emdiehl@pa.gov">emdiehl@pa.gov</a> or (717) 787.9121.

Sincerely,

Douglas C. McLearen, Chief

Dr. 6.711\_

Division of Archaeology and Protection

C: Tony Cho, FTA Liz Smith, SEPTA Leslie Roche, AECOM Kate Farnham, AECOM