



ROVER PIPELINE

An ENERGY TRANSFER Company

ROVER PIPELINE LLC

Rover Pipeline Project

RESOURCE REPORT 4
Cultural Resources

FERC Docket No. CP15-____-000

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LIST OF ACRONYMS

APE	Area of Potential Effects
CFR	Code of Federal Regulations
FERC or Commission	Federal Energy Regulatory Commission
GPS	Global Positioning System
HDD	horizontal directional drill
hp	horsepower
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
Project	Rover Pipeline Project
Rover	Rover Pipeline LLC
SHPO	State Historic Preservation Office/Officer
U.S.	United States

RESOURCE REPORT 4 -- CULTURAL RESOURCES	
Filing Requirement	Location in Environmental Report
<ul style="list-style-type: none"> • Resource Report 4 must contain: (§ 380.12 (f) (1)) <ul style="list-style-type: none"> (i) Documentation of the applicant's initial cultural resources consultation, including consultations with Native Americans and other interested persons (if appropriate); (ii) Overview and Survey Reports, as appropriate; (iii) Evaluation Report, as appropriate; (iv) Treatment Plan, as appropriate; and (v) Written comments from State Historic Preservation Officer(s) (SHPO), Tribal Historic Preservation Officers (THPO), as appropriate, and applicable land-managing agencies on the reports in paragraphs (f)(1)(i)-(iv) of this section. 	<p style="text-align: center;">Sections 4.4 and 4.6 Summary Tables are in Appendix 4A Initial correspondence are in Volume IV, Attachment 4A</p> <p style="text-align: center;">Survey Reports and other documentation, as applicable, are in Volume IV, Attachments 4B–4G</p>
<ul style="list-style-type: none"> • The initial application must include the documentation of initial cultural resource consultation, the Overview and Survey Reports, if required, and written comments from SHPOs, THPOs and land-managing agencies, if available. The initial cultural resources consultations should establish the need for surveys. If surveys are deemed necessary by the consultation with the SHPO/THPO, the survey report must be filed with the application. (§ 380.12(f) (2)) <ul style="list-style-type: none"> (i) If the comments of the SHPOs, THPOs, or land-management agencies are not available at the time the application is filed, they may be filed separately, but they must be filed before a final certificate is issued. (ii) If landowners deny access to private property and certain areas are not surveyed, the unsurveyed area must be identified by mileposts, and supplemental surveys or evaluations shall be conducted after access is granted. In such circumstances, reports, and treatment plans, if necessary, for those inaccessible lands may be filed after a certificate is issued. 	<p style="text-align: center;">Sections 4.4 and 4.6</p> <p style="text-align: center;">Initial correspondence is in Volume IV, Attachment 4A</p> <p style="text-align: center;">Survey Reports are in Volume IV, Attachments 4B–4G Comments will be provided as received.</p>
<ul style="list-style-type: none"> • The Evaluation Report and Treatment Plan, if required, for the entire project must be filed before a final certificate is issued. (§ 380.12(f) (3)) <ul style="list-style-type: none"> (i) The Evaluation Report may be combined in a single synthetic report with the Overview and Survey Reports if the SHPOs, THPOs, and land-management agencies allow and if it is available at the time the application is filed. (ii) In preparing the Treatment Plan, the applicant must consult with the Commission staff, the SHPO, and any applicable THPO and land-management agencies. (iii) Authorization to implement the Treatment Plan will occur only after the final certificate is issued. 	To Be Filed, If Applicable
<ul style="list-style-type: none"> • Applicant must request privileged treatment for all material filed with the Commission containing location, character, and ownership information about cultural resources in accordance with § 388.112 of this chapter. The cover and relevant pages or portions of the report should be clearly labeled in bold lettering: “CONTAINS PRIVILEGED INFORMATION - DO NOT RELEASE.” (§ 380.12(f) (4)) 	As Filed
<ul style="list-style-type: none"> • Except as specified in a final Commission order, or by the Director of the Office of Energy Projects, construction may not begin until all cultural resource reports and plans have been approved. (§ 380.12(f) (5)) 	As Filed

4.0 CULTURAL RESOURCES

4.1 INTRODUCTION

Rover Pipeline LLC (Rover) is seeking authorization from the Federal Energy Regulatory Commission (FERC) pursuant to Section 7(c) of the Natural Gas Act to construct, own, and operate the proposed Rover Pipeline Project (Project). The Rover Pipeline Project is a new natural gas pipeline system that will consist of approximately 711.2 miles of Supply Laterals and Mainlines, 10 compressor stations, and associated meter stations and other aboveground facilities that will be located in parts of West Virginia, Pennsylvania, Ohio, and Michigan. The Project will include approximately 509.1 miles of proposed right-of-way, extending from the vicinity of New Milton, Doddridge County, West Virginia to the vicinity of Howell, Livingston County, Michigan and will include approximately 202.1 miles of dual pipelines.

The Project will consist of the following components and facilities:

- Supply Laterals:
 - eight supply laterals consisting of approximately 199.7 miles of 24-, 30-, 36-, and 42-inch-diameter pipeline in West Virginia, Pennsylvania, and Ohio,
 - two parallel supply laterals, each consisting of approximately 18.8 miles (for a total of approximately 37.6 miles) of 42-inch-diameter pipeline (Supply Connector Lateral Line A and Line B) in Ohio,
 - approximately 72,645 horsepower (hp) at six new compressor stations to be located in Doddridge and Marshall counties, West Virginia; Washington County, Pennsylvania; and Noble, Monroe, and Harrison counties, Ohio, and
 - two new delivery, 11 new receipt, and two bidirectional meter stations on the Supply Laterals.

- Mainlines A and B:
 - approximately 190.6 miles of 42-inch-diameter pipeline (Mainline A) in Ohio,
 - approximately 183.3 miles of parallel 42-inch-diameter pipeline (Mainline B) in Ohio,
 - approximately 114,945 hp at three new compressor stations to be located in Carroll, Wayne, and Crawford counties, Ohio, and
 - two new delivery meter stations in Defiance County, Ohio.

- Market Segment:
 - approximately 100.0 miles of 42-inch diameter pipeline in Ohio and Michigan,
 - approximately 25,830 hp at one new compressor station to be located in Defiance County, Ohio, and
 - two new delivery meter stations in Washtenaw and Livingston counties, Michigan.

Resource Report 4 provides a discussion of existing cultural resources within the vicinity of the Project. Section 4.2 of this report identifies the scope and authority under which the cultural resource

investigations and consultations for the Project are being undertaken. The Area of Potential Effects (APE) evaluated for cultural resources is defined in Section 4.3. Section 4.4 provides a summary of the cultural resources investigation conducted to date. Section 4.5 provides a discussion of areas that have not been surveyed. Agency, Native American, and consulting party consultations are discussed in Section 4.6. Section 4.7 describes the Procedures Guiding the Discovery of Unanticipated Cultural Resources and Human Remains: Post-Review Discoveries (Unanticipated Discovery Plan), which is included in Appendix 4B. Section 4.8 provides an overall summary.

4.2 REGULATORY OVERVIEW

Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), requires federal agencies, including the FERC, to take into account the effect of an undertaking on cultural resources listed or eligible for listing in the National Register of Historic Places (NRHP) and afford the Advisory Council on Historic Preservation an opportunity to comment on the undertaking. The Section 106 compliance process is coordinated at the state level by the State Historic Preservation Officer (SHPO), represented in West Virginia by the Division of Culture and History (West Virginia SHPO), in Pennsylvania by the Bureau for Historic Preservation (Pennsylvania SHPO), in Ohio by the Ohio History Connection (Ohio SHPO), and in Michigan by the Michigan State Housing Development Authority (Michigan SHPO). The FERC, as the lead federal agency, must consult with the West Virginia, Pennsylvania, Ohio, and Michigan SHPOs, appropriate federally recognized Native American tribes, and other consulting parties regarding the effects of the Project on historic properties.

The primary goals of cultural resource investigations conducted as part of the Section 106 review are to:

- locate, document, and evaluate buildings, structures, objects, landscapes, and archaeological sites that are listed, or eligible for listing, in the NRHP;
- assess potential effects of the Project on those resources; and
- provide recommendations for subsequent treatment, if necessary, to assist with compliance with Section 106.

In addition to complying with Section 106 and its implementing regulations (36 Code of Federal Regulations (CFR) Part 800, *Protection of Historic Properties*), the cultural resources investigation was conducted for the Project in accordance with:

- 18 CFR Part 380, FERC's Regulations Implementing the National Environmental Policy Act (including Sections 380.3 – Environmental Information to be Supplied by an Applicant and 380.14 – Compliance with the NHPA, and FERC's Office of Energy Projects' Guidelines for Reporting on Cultural Resources Investigations (2002);
- the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 Federal Register 44, 716-42 (Sept. 29, 1983));
- West Virginia State Codes 29-1-8 and 29-1-8a and their implementing regulations, Title 82, Series 2 and 3, and the West Virginia SHPO's Guidelines for Phase I, II, and III Archaeological Investigations and Technical Report Preparation;

- The Environmental Rights Amendment, Article 1, Section 27 of the Pennsylvania Constitution and Pennsylvania History Code (37 PA. Cons. Stat. Section 500 et seq.), the Pennsylvania SHPO’s Guidelines for Archaeological Investigations in Pennsylvania (2008), Guidelines for Architectural Investigations in Pennsylvania (2014), and Survey Guidelines for Pipeline Projects Above Ground Resources (2013);
- Ohio’s Revised Code Sections 149:51–149:54 and the Ohio SHPO’s Archaeology Guidelines (1994); and
- Natural Resources and Environmental Protection Act, Public Act 451 of 1994, Part 761 (Michigan’s Environmental Protection Act); and the Michigan SHPO’s Manual for Historic and Architectural Surveys in Michigan (2001).

At present, no federal lands are crossed by the Project. An archaeological/excavation permit was procured from the Ohio SHPO for work on state lands in Ohio, and a permit to perform archaeological exploration on state-owned lands was obtained from the Michigan Department of Natural Resources.

To assist FERC in complying with the NHPA, Rover initiated the requisite consultations and is conducting a Phase I cultural resources survey to determine if any historic properties might be affected by the Project. Rover is committed to avoiding any Project impacts to all NRHP eligible resources. Technical survey reports for archaeological resources and historic architectural/industrial properties for the Project are provided in Volume IV, Attachments 4B–4G. Due to the sensitive nature of some of the material within the reports, the covers and any applicable pages are labeled “*CONTAINS PRIVILEGED INFORMATION – DO NOT RELEASE*” in accordance with 36 CFR § 800.11(c)(1) in Volume IV filed with Rover’s application.

4.3 AREA OF POTENTIAL EFFECTS

The APE 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)). The APE is defined based on the potential for effect, which may differ for aboveground resources (historic structures and landscapes) and subsurface resources (archaeological sites). The APE for subsurface resources includes all areas where ground disturbances are proposed along the Project’s pipeline routes, while the APE for aboveground locations includes the disturbed areas as well as areas where land use may change and any locations from which the Project may be visible.

4.3.1 APE for Archaeological Resources

For archaeological resources, the Project APE consists of areas of potential ground disturbance for the pipeline trench and permanent easement, associated temporary workspaces (temporary construction right-of-way and additional temporary workspace), compressor and meter station sites, launcher/receiver facilities, access roads, contractor yards, and horizontal directional drill (HDD) locations. The areal extent of the individual facilities varies, and specific dimensions of each location are provided in the technical reports. The vertical APE for the proposed pipeline trench is typically seven feet to fifteen feet below surface, depending on conditions encountered during construction (e.g., depth of existing utilities).

However, the pipeline trench may be deeper in agricultural areas with drainage tiles, at locations where existing utilities are crossed, in HDDs, etc. The archaeological overview survey typically consists of a 400-foot-wide study corridor for the pipeline and encompasses all areas where ground disturbances are currently proposed. The APE for archaeological resources also includes areas where the pipeline will be installed using the HDD method and the entire area that will be acquired for the aboveground facilities.

4.3.2 APE for Historic Architectural/Industrial Properties

The Project APE for historic architectural/industrial properties was developed to define the areas within which historic architectural/industrial properties could be affected by construction-related activities. The majority of the Project facilities will be situated below ground, but Project facilities will also include aboveground facilities such as compressor stations and meter stations. The APE for direct effects to historic architectural/industrial properties includes the 400-foot-wide environmental study corridor and the land that will be acquired for the aboveground facilities.

Beyond such areas of direct effects, the APE for historic resources also includes areas that have a visual link to the Project such that their landscape setting and viewshed (through removal of vegetation or modifications of surface topography, for example) lie within view of a historic resource, which is defined as any building or structure at least 50 years of age. Viewsheds to and from the Project corridor(s) were terminated where vegetation and/or topography obstructed lines-of-sight and would not change as a result of construction. The architectural APE also includes a distance up to 0.8 km (0.5 mile) surrounding the aboveground ancillary facilities, including the compressor station and meter sites, and access roads. Viewsheds to and from the aboveground ancillary facilities were terminated where vegetation and/or topography obstructed lines-of-sight. Potential noise impacts are being evaluated and may require further analysis in order to make the appropriate evaluation and recommendation.

4.4 CULTURAL RESOURCE INVESTIGATIONS

Cultural resource investigations are being conducted in accordance with FERC and state SHPO guidelines by persons who meet or exceed all requirements set forth by the Secretary of Interior at 36 CFR Part 61. Tables 4A-1, 4A-2, and 4A-3 in Appendix 4A summarize the status of cultural resources surveys for the pipelines, aboveground facilities, and access roads and contractor yards, respectively.

4.4.1 Overview Literature Survey

The initial phase of the investigation involved an overview literature survey to gather information about previous cultural resource investigations and known archaeological sites and historic architectural/industrial properties within one mile of the Project APE. The following methodology was used to complete the overview:

- identification of any known archaeological sites and previously recorded historic architectural/industrial properties through background research and state site file searches. Data

pertaining to the known sites, including their locational, functional, and temporal characteristics, were reviewed where applicable;

- review of recent cultural resource management surveys performed in the counties where the Project is located; and
- review of primary and secondary historic information (e.g., maps, county histories) to learn of areas where previous structures and landscapes were potentially located.

As part of this work, research was conducted at the West Virginia, Pennsylvania, Ohio, and Michigan SHPOs and various other local libraries and repositories. A search of available records indicates that there are various cultural resources located within one mile of the Project APE. The frequency and type of cultural resources previously recorded within the vicinity of each element of the Project, including those previously recorded cultural resources located within the Project APE (access roads, contractor yards, compressor stations, meter stations, etc.), are discussed in the technical reports.

4.4.2 Archaeological Survey Results

Systematic archaeological field surveys typically include a 400-foot-wide survey corridor along the Project pipelines and a 50-foot corridor centered on the access roads. Other Project facilities (e.g., compressor stations, meter stations) were surveyed in their entirety. The survey procedures include a pedestrian walkover of all portions of the APE, systematic surface examination of all suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources. All portions of the APE are being inspected for caves, quarries, benches, rock faces, rock overhangs, and rock shelters. The archaeological surveys began on June 23, 2014, and are continuing. This Resource Report contains information on all survey activities conducted through December 2014.

In West Virginia and Pennsylvania, 50 × 50 cm (19.7 × 19.7 inches) shovel test pits were excavated at a maximum interval of 15 m (49 feet), and additional close interval shovel test pits were excavated to delineate potential archaeological sites and finds. Excavated soil was hand screened through ¼-inch wire mesh. Cultural materials remaining in the mesh were bagged and tagged by level within each shovel test pit, and the count and types of recovered cultural material were noted on field forms. Soil profiles were recorded for each shovel test pit on standardized forms. All shovel test pits were filled following excavation to restore the ground surface to its original contour. Digital photographs were taken of the general project area and recorded on standardized logs. Sub-meter Global Positioning System (GPS) data were collected from each positive shovel test pit location excavated within the study area. In some areas where survey access was restricted (where TRC had permission to enter and conduct a survey, but not to collect any artifacts), in-field analysis was conducted and the study area was reduced to a 250-foot-wide corridor. In these instances, a specialized crew of two archaeologists with expertise in laboratory analysis completed analysis of all artifacts found after the field crew had completed excavation or surface inspection according to the following protocol. Artifacts were cleaned as much as possible and photographed next to a scale in multiple views with a digital camera. They were then weighed using a digital scale, the dimensions of lithic tools were measured with digital calipers, and a sketch of lithic tools was made on the analysis forms. Detailed artifact information similar to that typically recorded in the

laboratory was recorded on standard analysis forms. Once the analysis was complete, the artifacts were placed in an artifact bag labeled with the provenience information and reburied in the shovel test where they were found or returned to the landowner if requested. Artifact photographs, sketches, and descriptions were further examined in the laboratory, the data was entered into a separate artifact catalog, and additional details were recorded if noted. Summary data on each isolated find, site, or other resource were recorded on standardized site and isolated find forms. Additional documentation was recorded as necessary, and all shovel test pit locations were recorded on aerial photographs and/or sketch maps. Visible surface features (e.g., foundations) encountered during the survey were recorded through description and photographs, and locational data were collected with the GPS and drawn on Project maps.

In Ohio, 50 × 50 cm (19.7 × 19.7 inches) shovel test pits were excavated at a maximum interval of 15 m (49 feet), and additional close interval shovel test pits were excavated to delineate potential archaeological sites and finds. Tests were excavated by natural levels until a 10-cm culturally sterile level was excavated into the subsoil or to a maximum depth of 50 cm (1.6 feet) below surface, unless natural obstructions (e.g., rocks, bedrock, or roots) prevented further excavation. Excavated soil was hand screened through ¼-inch wire mesh. Cultural materials remaining in the mesh were bagged and tagged by level within each shovel test pit, and the count and types of recovered cultural material were noted on field forms. In some areas where survey access was restricted, in-field analysis was conducted following the protocol described above and the study area was reduced to a 250-foot-wide corridor. Soil profiles were recorded for each shovel test pit on standardized forms. All shovel test pits were filled following excavation to restore the ground surface to its original contour. Digital photographs were taken of the general area and recorded on standardized logs. Sub-meter GPS data were collected from each positive shovel test pit location excavated within the study area.

When cultural material was encountered, archaeological sites in Ohio were operationally defined as a grouping of two or more non-modern historic or prehistoric artifacts from surface or subsurface context within any two contiguous positive shovel test pits (following Ohio SHPO guidelines). Occurrences of fewer than two artifacts were designated isolated finds, but sufficient investigations were made to verify the isolated nature of the occurrence. Deposits of cultural artifacts that have no integrity, such as within road fill, stream gravels, or other situations where artifacts clearly are re-deposited, were also considered isolated finds. Summary data on each isolated find, site, or other resources were recorded on standardized site and isolated find forms. Additional documentation was recorded as necessary, and all shovel test pit locations were recorded on aerial photographs and/or sketch maps. Visible surface features (e.g., foundations) encountered during the survey were recorded through description and photographs, and locational data were collected with the GPS and drawn on Project maps.

In Michigan, 30 × 30 cm (11.8 × 11.8 inches) shovel test pits were excavated at a maximum interval of 15 m (49 feet), and additional close interval test pits were excavated to delineate potential archaeological sites and finds. Tests were excavated by natural levels until a 10-cm culturally sterile level was excavated into the subsoil or to a maximum depth of 50 cm (1.6 feet) below surface, unless natural obstructions (e.g., rocks, bedrock, or roots) prevented further excavation. Excavated soil was hand screened through ¼-inch wire mesh. Cultural materials remaining in the mesh were bagged and tagged by level within each shovel test pit, and the count and types of recovered cultural material were noted on field forms. In some

areas where survey access was restricted, in-field analysis was conducted following the protocol described above and the study area was reduced to a 250-foot-wide corridor. Soil profiles were recorded for each shovel test pit on standardized forms. All shovel test pits were filled following excavation to restore the ground surface to its original contour. Digital photographs were taken of the general area and recorded on standardized logs. Sub-meter GPS data were collected from each positive test pit location excavated within the study area. Additional documentation was recorded as necessary and all shovel test pit locations were recorded on aerial photographs and/or sketch maps. Visible surface features (e.g., foundations) encountered during the survey were recorded through description and photographs, and locational data were collected with the GPS and drawn on Project maps.

4.4.2.1 West Virginia Archaeological Survey Results

The archaeological surveys completed in West Virginia have resulted in the identification of ten archaeological resources in the Project study corridor, including: four prehistoric archaeological sites, five historic archaeological sites, and one archaeological site with prehistoric and historic components (see Table 4A-4 in Appendix 4A). Three prehistoric archaeological sites, three historic archaeological sites, and one prehistoric and historic archaeological site were found along the Sherwood Lateral. One prehistoric archaeological site and two historic archaeological sites were found along the Majorsville Lateral.

At this time, three archaeological sites remain unassessed within the Project study areas in West Virginia, only because shovel tests could not reach below the base of potential cultural-bearing soils (see Table 4A-4 in Appendix 4A). As defined by the survey results thus far, however, all three sites are considered not eligible for the NRHP. Deep testing will be conducted at these three sites to determine whether they contain deeply buried archaeological deposits that are eligible for the NRHP. Should an NRHP eligible resource be identified at any of these sites, Rover will avoid the site through a realignment of the corridor. The remaining seven archaeological sites in West Virginia have limited research potential and are not eligible under NRHP Criterion D, and also do not appear to be eligible under NRHP Criteria A, B, or C. They are recommended as not eligible for listing in the NRHP, and no further archaeological evaluation is recommended (see Table 4A-4 in Appendix 4A).

4.4.2.2 Pennsylvania Archaeological Survey Results

The archaeological survey in Pennsylvania has resulted in the identification of one new historic archaeological resource in the Project study corridor (see Table 4A-5 in Appendix 4A). This site is located on the Burgettstown Lateral and is recommended not eligible for the NRHP. No further archaeological evaluation is recommended for this resource (see Table 4A-5 in Appendix 4A).

4.4.2.3 Ohio Archaeological Survey Results

The archaeological surveys in Ohio have resulted in the identification of 175 archaeological resources in the Project study corridor, including: 133 prehistoric archaeological sites or isolated finds, 30 historic archaeological sites or isolated finds, and 12 prehistoric and historic archaeological sites (see Table 4A-6

in Appendix 4A). These include one prehistoric and historic archaeological resource and one historic archaeological resource along the Seneca Lateral; five prehistoric archaeological resources and nine historic archaeological resources along the Clarington Lateral; one prehistoric archaeological resource and two historic archaeological resources along the Majorsville Lateral; one historic archaeological resource along the Berne Lateral; four prehistoric archaeological resources along the Burgettstown Lateral; one prehistoric archaeological resource along the Cadiz Lateral; three prehistoric archaeological resources, two historic archaeological resources, and one prehistoric and historic archaeological resources along the Sherwood Lateral; one prehistoric archaeological resource at the Cadiz Tie-In; 112 prehistoric archaeological resources, 14 historic archaeological resources, and 10 prehistoric and historic archaeological resources along the Mainline; and six prehistoric archaeological resources and one historic archaeological resource along the Ohio portion of the Market Segment (see Table 4A-6 in Appendix 4A).

During the FERC Pre-Filing Review Process, a comment was received concerning the property of Judy and Dawson Alsdorf. Archaeological sites 33WE84 and 33WE661 are located within the Project APE on the Wayne County property. Site 33WE84 was previously identified by the Wayne County Historical Society and is one of four sites recorded on that property in 1981. Site 33WE84 was described as an open camp site that produced a low density of lithic artifacts, one of which dates to the Early Archaic period. Site 33WE661 was discovered during the Project survey approximately 155 m (508.5 ft) east of 33WE84. During the Project survey, both sites were represented by low density scatters of nondiagnostic lithic artifacts, indicating a campsite or campsites in the vicinity, but not substantial or long term occupations. No evidence of a mound or village site was encountered in the Project study corridor. Artifacts recovered from these two sites during the Project survey consist of two nondiagnostic biface fragments, two retouched flakes, and 37 chert flakes. Artifacts were analyzed in the field and returned to the landowner. All of the artifacts were returned, and none of the artifacts was retained, although several noncultural pieces of chert were discarded onsite after the survey was completed during the analysis.

At this time, Rover recommends six archaeological sites identified within the Project study area in Ohio as potentially eligible for listing in the NRHP (see Table 4A-6 in Appendix 4A). One of those sites (33SE285) will be avoided by HDD well below the resource, as preliminarily approved by the Ohio SHPO, and no further work is recommended for that site. Two of these sites (33MO138 and 33MO139) are within the 400 ft study corridor, but outside the construction workspace and will be avoided by all Project activities. Rover plans to place protective fencing around the perimeter of the site during construction to ensure that no inadvertent impacts occur to these sites. The remaining three potentially eligible sites have been avoided by modifications to the Project alignment, and no further consideration of those resources is recommended for this Project. The remaining 169 archaeological sites and isolated finds in Ohio have limited research potential and are not eligible under NRHP Criterion D, and also do not appear to be eligible under NRHP Criteria A, B, or C. They are recommended as not eligible for listing in the NRHP, and no further archaeological evaluation is recommended (see Table 4A-6 in Appendix 4A).

The Rover Mainline crosses the Ohio and Erie Canal approximately 1.7 miles northwest of Bolivar and crosses the Miami and Erie Canal approximately one mile southwest of Florida. Planning for the canals began as early as 1817, and in 1825, work began simultaneously on the Ohio & Erie and the Miami &

Erie canals. By 1830, much of the Erie & Ohio was completed, and the economic effects were immediately felt. Competition from railroads, damage from several severe storms, and an aging canal system all contributed to its decline by the mid-nineteenth century, and parts of the system were leased and/or sold to private interests. An about 110-mile section of the Erie & Ohio Canal, from Zoar to Cleveland, was designated a National Heritage Area in 1996. Several key features (locks, dams, aqueducts, associated structures) of both of the canals have been recorded as cultural resources with the Ohio SHPO, but the canals themselves are not recorded as historic properties with the state. No cultural resources associated with either canal were identified within the Project APE, and Rover will avoid any potential impact to these resources by HDD.

4.4.2.4 Michigan Archaeological Survey Results

The archaeological survey in Michigan has resulted in the identification of 43 archaeological resources in the current Project APE, including: 30 prehistoric archaeological sites or isolated finds, 10 historic archaeological sites or isolated finds, and three prehistoric and historic archaeological sites, all along the Market Segment (see Table 4A-7 in Appendix 4A). Changes to the alignment, particularly the northern portion, which eliminated six counties from the Project area (Genesee, Lapeer, Macomb, Oakland, Shiawassee, St. Clair), were made after the technical report was submitted to the Michigan SHPO, resulting in substantially different numbers for this report and the technical survey report.

At this time, Rover has determined that five archaeological sites identified within the Project study areas in Michigan require further evaluation to determine NRHP eligibility (see Table 4A-7 in Appendix 4A). All five of those sites have been avoided by a realignment of the Project corridor, and no further work is recommended for this Project. The remaining 38 archaeological sites/isolated finds in Michigan have limited research potential and are not eligible under NRHP Criterion D, and also do not appear to be eligible under NRHP Criteria A, B, or C. They are recommended as not eligible for listing in the NRHP, and no further archaeological evaluation is recommended (see Table 4A-7 in Appendix 4A).

4.4.3 Historic Architectural/Industrial Properties Survey Results

Following background research, a systematic historic architectural/industrial properties field survey was conducted of the Project corridor and other facilities. The fieldwork involved the identification of all aboveground properties within the study area that appeared to be at least 50 years old or were included in previous inventories. Aerial base maps and property parcel maps were used during the fieldwork to identify the study area. Architectural historians visited all accessible parcels, associated properties, and known or potential historic districts for which any portion of the property intersected with the study area. Each property included in the survey was assigned a survey number and plotted on a base map. Data regarding the current condition and significant characteristics of identified properties were recorded, and the information on the inventory forms for previously surveyed properties was verified. Photographs of each surveyed property and its views toward the Project facilities were taken with a high-resolution digital camera. Within known and potential historic districts, the surveyors recorded information about the area's character; photographed streetscapes, views, and individual properties; and studied the boundaries of the district.

Based on the condition, integrity, materials, approximate age, design, and setting of the identified resources, a preliminary assessment was formed regarding the potential NRHP eligibility of each property. A preliminary assessment of the potential effects of the Project was conducted for properties that are listed on or evaluated as potentially eligible for listing in the NRHP. The assessment takes into account the location of the property in relation to the Project facilities, the nature of the potential effects, and the characteristics of the property's significance.

4.4.3.1 West Virginia Historic Architectural/Industrial Properties Survey Results

In West Virginia, historic architectural/industrial fieldwork was conducted from September 30, 2014 through October 9, 2014. The Project survey identified one newly recorded and one previously recorded historic architectural/industrial properties within the Project study areas in West Virginia, both along the Sherwood Lateral. Table 4A-8 in Appendix 4A lists the historic architectural/industrial properties identified in West Virginia for the Project. Rover recommends one historic architectural/industrial property identified within the Project study areas in West Virginia (the early nineteenth century Stender Cemetery) as potentially eligible for listing in the NRHP. This cemetery and another cemetery identified along the Sherwood Lateral do not extend into the construction right-of-way and will not be impacted by project activities. To further protect these resources from any potential incidental impacts during construction, a 100-foot buffer will be established and maintained around the perimeter of each cemetery.

4.4.3.2 Pennsylvania Historic Architectural/Industrial Properties Survey Results

In Pennsylvania, fieldwork was conducted from September 30, 2014 through October 9, 2014, and from November 11–14, 2014. The Project surveys identified two previously recorded and two newly recorded historic architectural/industrial properties within the Project study areas along the Burgettstown Lateral in Pennsylvania. Table 4A-9 in Appendix 4A lists the historic architectural/industrial properties identified in Pennsylvania for the Project. One historic architectural/industrial property (PA-HS-002/ Key No. 139277) identified within the Project study areas in Pennsylvania has been previously determined eligible for the NRHP by the Pennsylvania SHPO. In its current condition, however, this resource does not retain its physical integrity and is recommended not eligible for the NRHP. The Project will have no direct or indirect effect on this property. The remaining three historic architectural/industrial properties identified in Pennsylvania are recommended as not eligible for listing in the NRHP, and no additional evaluation is recommended (see Table 4A-9 in Appendix 4A).

4.4.3.3 Ohio Historic Architectural/Industrial Properties Survey Results

In Ohio, fieldwork was conducted from September 30, 2014 through October 9, 2014, and from November 11–14, 2014. The Project survey identified 79 historic architectural/industrial properties within the Project study areas in Ohio, including one property along the Sherwood Lateral, seven properties along the Seneca Lateral, one property along the Cadiz Lateral, six properties along the Clarington Lateral, 12 properties along the Burgettstown Lateral, 40 properties along Mainlines A and B, four properties along the Market Segment in Ohio, two properties at the Mainline Compressor Station 1, one property at the Mainline Compressor Station 2, three properties at the Mainline Compressor Station 3, and two properties at the Defiance Compressor Station. Table 4A-10 in Appendix 4A lists the historic

architectural/industrial properties identified in Ohio for the Project. Thirty-six historic architectural/industrial properties identified within the Project study areas in Ohio are recommended as potentially eligible for listing in the NRHP. The Project is expected to have no adverse effect on 35 of those resources, and no further work is recommended for those resources for this Project (see Table 4A-10 in Appendix 4A). Resource CAR0266012, an 1843 Federal House in Carroll County, is across a road from the planned location of the Mainline Compressor Station 1. No other prudent or feasible locations for this compressor station were identified, and Rover will consult with the Ohio SHPO to formulate a screening plan to eliminate any effects (visual and audial) related to the Project. Rover is committed to a solution that results in no adverse effects to this resource. The remaining 43 historic architectural/industrial properties identified in Ohio are recommended as not eligible for listing in the NRHP, and no additional evaluation is recommended (see Table 4A-10 in Appendix 4A). Six of those 43 resources considered not eligible for the NRHP are cemeteries identified in proximity to the Project areas in Ohio. They will not be affected by project plans, but to avoid possible inadvertent impacts to the cemeteries during construction, a 100-foot buffer will be established and maintained around the perimeter of each.

4.4.3.4 Michigan Historic Architectural/Industrial Properties Survey Results

In Michigan, fieldwork was conducted from July 22, 2014 through September 23, 2014. Project surveys identified 40 historic architectural/industrial properties within the current Project APE for the Market Segment in Michigan. Table 4A-11 in Appendix 4A lists the historic architectural/industrial properties identified in Michigan for the Project. Changes to the alignment, particularly the northern portion, which eliminated six counties from the Project area (Genesee, Lapeer, Macomb, Oakland, Shiawassee, St. Clair), were made after the technical report was submitted to the Michigan SHPO, resulting in substantially different numbers for this report and the technical survey report.

Nine historic architectural/industrial properties identified within the Project APE in Michigan are recommended as eligible for listing in the NRHP. The Project will not have an adverse effect on six of those resources, and no further work is recommended for those resources for this Project (see Table 4A-11 in Appendix 4A). Additional evaluation will be performed to consider potential Project effects to the remaining three eligible properties, and alignment changes will be made as necessary to avoid any adverse effects to these resources. The remaining 31 historic architectural/industrial properties identified in Michigan are recommended as not eligible for listing in the NRHP, and no additional evaluation is recommended for those resources (see Table 4A-11 in Appendix 4A).

4.5 REMAINING SURVEYS

Table 4A-12 in Appendix 4A provides the status of remaining cultural resource surveys for the Project as of December 2014. For the archaeological survey in West Virginia, approximately 3 percent of the corridor, approximately 60 percent of the access roads, the Majorsville Contractor Yard, and the Sherwood Compressor Station location remain to be surveyed. For the archaeological survey in Pennsylvania, approximately 41 percent of the corridor, 50 percent of the access roads, the Burgettstown Compressor Station and Burgettstown Contractor Yard remain to be surveyed. For the archaeological

survey in Ohio, approximately 5 percent of the corridor, approximately 53 percent of the access roads, the Clarington Compressor Station and Clarington Tie-In Site, and two contractor yards and 17% of a third contractor yard remain to be surveyed. For the archaeological survey in Michigan, approximately 23 percent of the corridor, both of the meter stations, and 14 percent of the access roads remain to be surveyed.

For the historic architectural/industrial properties identification surveys, the Sherwood Compressor Station and Vector Meter Station locations remain to be surveyed, but all other Project areas are complete in West Virginia, Pennsylvania, Ohio, and Michigan.

4.6 CONSULTATIONS

Rover, as authorized by FERC, initiated Section 106 consultation with various state and local agencies, and contact with Native American groups located in or having interests regarding cultural resources in West Virginia, Pennsylvania, Ohio, and Michigan. Correspondence related to these consultations and contacts is included in Volume IV as Attachment 4A. Additional correspondence will be forwarded to the Commission upon receipt.

4.6.1 West Virginia State Historic Preservation Office Consultation

Rover initiated Section 106 consultation with the West Virginia SHPO by submitting a Project information package, including a map of the Project for review and comment on June 25, 2014. On July 23, 2014, the West Virginia SHPO responded by assigning a tracking number to the Project and clarified that all Project materials sent to the West Virginia SHPO must clearly state that they are being submitted for compliance with Section 106. On August 26, 2014, an updated Project information package was submitted, including an updated map of the Project for review and comment. Rover staff also held a conference call with the West Virginia SHPO on October 14, 2014. General information regarding the project was presented and the SHPO was asked for input on any concerns or preferences regarding cultural resources survey and reporting for this project. The SHPO stated that no architectural survey was necessary in areas where no aboveground facilities were planned. Rover corresponded with the West Virginia SHPO to obtain background research materials related to the project beginning on September 26, 2014 and ending on October 22, 2014. Rover provided the West Virginia SHPO with draft archaeological site forms on December 12, 2014. The SHPO responded on December 16, 2014, providing state assigned site numbers for those resources. On January 27, 2015, Rover submitted a draft technical report to the West Virginia SHPO detailing the results of the 2014 architectural and archaeological studies for the Project.

4.6.2 Pennsylvania State Historic Preservation Office Consultation

Rover initiated Section 106 consultation with the Pennsylvania SHPO by submitting a Project information package, including a map of the Project for review and comment on June 25, 2014. On July 2, 2014, the Pennsylvania SHPO responded by assigning a tracking number to the Project and stating that they were unable to proceed with their review of the Project without additional information. On August 26, 2014, an

updated Project information package was submitted, including an updated map of the Project. On October 2, 2014, the Pennsylvania SHPO confirmed that a Phase I archaeological survey is required to locate potentially significant archaeological resources and that there may be NRHP eligible or listed historic buildings, structures, districts, and objects in the Pennsylvania portion of the Project. In addition, they provided information regarding survey protocols for aboveground resources. Rover held a conference call with the Pennsylvania SHPO on October 20, 2014 to provide an opportunity to personally introduce the project and seek input regarding any particular concerns the SHPO may have for the cultural resource surveys. The Pennsylvania SHPO requested separate architectural and archaeological reports for review.

Rover contacted the Pennsylvania SHPO via email on January 15, 2015 to request a state assigned number for one archaeological resource, and SHPO responded that same day with the assigned number. Rover contacted the Pennsylvania SHPO via email on January 20, 2015 to inquire which letter should be attached to the ER number on the upcoming submittal of the two technical reports. On January 27, 2015, Rover submitted draft technical reports to the Pennsylvania SHPO detailing the results of the 2014 architectural and archaeological studies for the Project.

4.6.3 Ohio State Historic Preservation Office Consultation

Rover initiated Section 106 consultation with the Ohio SHPO by submitting a Project information package, including a map of the Project for review and comment on June 25, 2014. On August 26, 2014, an updated Project information package was submitted, including an updated map of the Project for review and comment.

On September 29, 2014, Rover staff met with Ohio SHPO staff to further discuss the Project. Discussion topics included the Project facilities and routing, the status of cultural resource investigations to date, Ohio SHPO staff expectations for identification, evaluation, and treatment (if necessary) of archaeological and architectural resources, use of HDD, and in-field analysis on tracts with restricted survey access. Follow-up communications included e-mails dated September 30, October 7, and October 8, 2014, which were primarily associated with information to be used for in-field analysis on tracts with restricted survey access and the Ohio SHPO comments and suggestions on those procedures. Rover submitted an application for survey on state owned lands to the Ohio SHPO via email on October 17, 2014, and the SHPO responded on that day that clearance would be approved and provided the signed permit via email on November 13, 2014. Rover asked the Ohio SHPO via email on October 20, 2014 to review a proposed HDD location on the Ohio River. Rover asked the Ohio SHPO via email on October 21, 2014 to review another proposed HDD location on the Sandusky River. The Ohio SHPO responded to both email requests on October 21, 2014, stating that these two locations were good candidates for this type of site avoidance strategy.

On November 6, 2014, Rover initiated correspondence with the Ohio SHPO to inquire about state assigned archaeological site numbers. In a follow up email, Rover provided the information required to obtain those numbers, and the Ohio SHPO responded on December 8, 2014 with state assigned numbers for the archaeological resources. Rover contacted Ohio SHPO via email on December 22, 2014 for additional archaeological resource numbers and those numbers were provided on December 23, 2014.

Rover contacted the Ohio SHPO via email on December 3, 2014 to request state assigned numbers for the Project architectural resources, and the Ohio SHPO responded on December 4, 2014, providing numbers for those resources. Rover contacted Ohio SHPO via email on December 22, 2014 for additional architectural resource numbers, and Ohio SHPO responded with those numbers on December 23, 2014.

Rover contacted Ohio SHPO on January 12, 2015 to request additional contact information for groups associated with the Ohio and Erie Canal and Miami and Erie Canal. Ohio SHPO responded on January 15, 2015 with contact information for representatives of the Miami and Erie Canal Corridor Association and the Ohio & Erie Canal Coalition. On January 29, 2015, Rover submitted draft technical reports to the Ohio SHPO detailing the results of the 2014 architectural and archaeological studies for the Project.

4.6.4 Michigan State Historic Preservation Office Consultation

Rover initiated Section 106 consultation with the Michigan SHPO by submitting a Project information package, including a map of the Project for review and comment on June 25, 2014. This was followed up by e-mails in late July and a teleconference on August 1, 2014 to discuss non-collection strategy on areas where survey access was restricted. Subsequently, Rover submitted an updated Project information package, including an updated map for review and comment on August 26, 2014. On September 30, 2014, Rover staff met with Michigan SHPO staff to further discuss the Project. Discussion topics included the Project facilities and routing, the status of cultural resource investigations to date, and Michigan SHPO staff expectations for identification, evaluation, in-field analysis, and treatment (if necessary) of archaeological and architectural resources. The Michigan SHPO staff requested that Rover submit a permit for surveys on state lands, submit two copies of the technical report, and limit the number of addendum reports for the Project auxiliary facilities survey results (i.e., combining reports for new workspace, contractor yards, HDD pull backs, access roads, etc.). On October 9, 2014, Rover submitted an Application for Permit to Perform Archaeological Exploration on State-Owned Land for portions of state lands crossed by the Project. The Michigan SHPO acknowledged receipt of the application on October 10, 2014, provided a permit number, and clarified that there is a 30-day state and tribal review period. Michigan SHPO provided information regarding Native American groups that may have an interest in the Project via email on December 5, 2014.

On January 26, 2015, Rover submitted a draft technical report to the Michigan SHPO detailing the results of the 2014 architectural and archaeological studies for the Project. Rover contacted the Michigan SHPO via email on February 9, 2015 to convey information regarding changes to the Michigan portion of the Project, indicating which portions of the technical report were outside of the current Project APE and no longer required review. The SHPO responded with an acknowledgment that same day.

4.6.5 Native American Tribal Consultation

Rover, as authorized by FERC, initiated contact with 42 federally recognized Native American groups that may have an interest in the Project area to provide them with an overview and map of the Project, and an opportunity to identify any concerns related to properties of traditional religious or cultural significance that may be affected by the Project (see Table 4A-13 in Appendix 4A). Letters were sent to

the Native American groups with an interest in the project area by certified mail on October 3 and 29, 2014, November 11, 2014, and December 11, 2014. Rover received signed U.S. Post Office return receipts for all of the letters, with the exception of the two letters sent to the Prairie Band Potawatomi Nation and the one letter sent to the Leech Lake Band of the Minnesota Chippewa Tribe. The U.S. Post Office shows those deliveries as pending. Five of the contacted Native American groups (Peoria Tribe of Indians of Oklahoma, the Delaware Nation, Delaware Tribe of Indians, Seneca Nation of New York, and White Earth Band of Minnesota Chippewa Tribe) have responded to the notification letter and have indicated that they have no objections to the Project and are not aware of any Indian religious sites or objects of cultural significance or artifacts associated with their tribe near the Project location. The Lac Vieux Desert Band of Lake Superior Chippewa Indians responded with a request for payment of a fee to conduct the research. This request was marked “Tower Notifications” so Rover contacted the group via email on February 9, 2015 to verify that the fee structure also applied to linear projects. The group responded by email that same day confirming that the fee structure applied to all Section 106 reviews. Rover thanked the group for their response by email on February 13, 2015 and offered to accept any information the group was willing to provide. The group responded that day, indicating that they will provide comments on the Project. The Chippewa-Cree Indians of the Rocky Boy’s Reservation responded with a request that Project information be posted to a website after which it would be reviewed. Rover posted the requested information to that website on February 11, 2015, and is awaiting further response. To date, no responses have been received from the remaining Native American groups. Rover attempted follow up phone calls on February 11, 2015 to all groups who had not responded as of that date. Many groups could not be reached by phone, but messages were left for all but two of those groups. Two groups, the Lac du Flambeau Band of Lake Superior Chippewa Indians of the Lac du Flambeau Reservation of Wisconsin and the St. Croix Chippewa Indians of Wisconsin, could not be reached at any of the numbers on file. Five groups (Hannahville Indian Community, Keweenaw Bay Indian Community, Ottawa Tribe of Oklahoma, Pokagon Band of Potawatomi Indians, and Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin) requested new copies of the letter via email and those emails were sent February 13, 2015. The Fond du Lac Band of the Minnesota Chippewa Tribe requested a new copy of the letter by U.S. mail, and that letter was sent February 13, 2015.

4.6.6 Ohio Canals Groups Consultation

Rover, as requested by the Ohio SHPO, initiated contact via email on February 5, 2015 with representatives from two groups, the Miami and Erie Canal Corridor Association Group and the Ohio and Erie Canalways Coalition, that may have an interest in the specific portions of the Miami and Erie and the Ohio and Erie canals crossed by the Project. Rover contacted these representatives to provide them with information regarding the crossing locations and offer an opportunity to identify any concerns related to the canal crossings. Mr. Dan Rice, the President and Chief Executive Officer of the Ohio & Erie Canalway Coalition, responded on February 7, 2015 and stated that he was not aware of any canal related features in the Project area, but would like to be informed when the construction is scheduled for that crossing. No response has been received from the Miami and Erie Canal Corridor Association Group representative, but when received that correspondence will be forwarded to FERC.

4.7 UNANTICIPATED DISCOVERIES PLAN

A plan has been prepared to address the procedures that will be employed if previously unreported cultural resources, including human remains, are discovered during construction of the Project facilities. The plan will be submitted to the SHPOs for review, and revised as appropriate, and all SHPO comments and a revised (if necessary) plan will be provided to FERC. Copies of this plan will be available on-site during construction and construction field management and environmental inspectors will be trained regarding these procedures. A copy of the *Procedures Guiding the Discovery of Unanticipated Cultural Resources and Human Remains: Post-Review Discoveries* is included as Appendix 4B.

4.8 SUMMARY

To date, the archaeological surveys completed have resulted in the identification of 229 archaeological resources in the Project APE: one in Pennsylvania, 10 in West Virginia, 175 in Ohio, and 43 in Michigan. Rover recommends 11 sites (six in Ohio and five in Michigan) as potentially eligible for listing in the NRHP. All of those sites are now avoided by the Project, either through HDD or by alignment changes. At this time, three archaeological sites in West Virginia are considered to be unassessed for NRHP eligibility, as shovel test excavation could not extend to the C horizon, although as defined by the results thus far, they are considered not eligible for the NRHP. Deep testing will be conducted at these sites, and should an NRHP eligible resource be identified at any of these sites, it will be avoided by an alignment change. The remaining 215 archaeological resources are recommended not eligible for the NRHP, and no additional evaluation is recommended.

The historic architectural/industrial surveys completed to date have resulted in the identification of 125 historic architectural/industrial properties: two in West Virginia, four in Pennsylvania, 79 in Ohio, and 40 in Michigan. One historic architectural/industrial property (PA-HS-002/Key No. 139277) identified within the Project study areas in Pennsylvania has been previously determined eligible for the NRHP by the Pennsylvania SHPO, although due to its current deteriorated condition it is considered to no longer retain its NRHP eligibility. The Project will have no effect on this resource. Rover recommends one historic cemetery (WV-HS-001/WZ-0089/the Stender Cemetery) in West Virginia as potentially eligible for the NRHP. This resource is located outside the Project workspace and the Project will have no effect on this resource. To further protect this resource from any potential incidental impacts during construction, a 100-foot buffer will be established and maintained around the perimeter of the cemetery. A 100-foot buffer will also be established and maintained around the perimeter of another cemetery located near the Project corridor in West Virginia that is considered not eligible for the NRHP to protect it from inadvertent impacts during construction. Rover recommends nine properties in Michigan as eligible for listing in the NRHP. The Project will have no adverse effect on six of those resources, and no additional evaluation of those resources is recommended. Additional evaluation is recommended for the three remaining eligible properties to consider potential effects to each property by the Project. Alignment changes will be made, if necessary, to avoid any potential adverse effects to these resources. In addition, Rover recommends 36 properties in Ohio as potentially eligible for listing in the NRHP. The Project is expected to have no adverse effect on 35 of those resources, and no further work is recommended for those resources for this Project. Resource CAR0266012, an 1843 Federal House in Carroll County, is

across a road from the planned location of the Mainline Compressor Station 1. No other prudent or feasible location for this compressor station was identified, and Rover will consult with the Ohio SHPO to design a screening plan to eliminate any effects (visual and audial) to this property related to the Project. Rover is committed to a solution that results in no adverse effects to this resource. In addition, six cemeteries were identified in some proximity to the Project in Ohio. All are considered not eligible for the NRHP, but it is recommended that inadvertent impacts to these properties be avoided by establishing a 100-foot buffer around the perimeter of each during construction. The remaining 78 historic architectural/industrial properties are recommended not eligible for the NRHP, and no additional evaluation is recommended.

The results of the archaeological surveys and historic architectural/industrial surveys and property evaluations are presented in the technical reports that were submitted to the FERC and the West Virginia, Pennsylvania, Ohio, and Michigan SHPOs, and will be provided to Native American tribes and other consulting parties as appropriate and as requested.