

ATTACHMENT C – CORRESPONDENCE



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

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

- 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 mshaffer@pa.gov or (717) 783-9900. For questions concerning above ground resources, please contact Emma Diehl at emdiehl@pa.gov or (717) 787.9121.

Sincerely,



Douglas C. McLearn, Chief
Division of Archaeology and Protection

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



September 26, 2016

Mr. Dan Koenig
FTA
1760 Market Street, Suite 500
Philadelphia, PA 19103-4124

RE: ER 2013-1006-091-L; FTA: King of Prussia Rail Project; Upper Merion Township, Montgomery County; Intensive-Level Survey Forms

Dear Mr. Koenig,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Above Ground Resources

We offer the following comments in response to the intensive-level historic resource survey.

Eligible

Based on the information received and available within our files, we concur with the findings of the agency that the following property is **Eligible** for listing in the National Register of Historic Places:

- **National Offices of the American Baptist Church (588-590 N. Gulph Road)** – This property is Eligible for listing in the National Register of Historic Places under Criterion C in the area of Architecture, for the year 1962, the date of construction, for its exemplification of mid-century Modern architecture designed by notable architect Vincent Kling. The proposed boundary includes the current tax parcel, as indicated in the submission.

Not Eligible

We concur with the findings of the agency that the following properties are **Not Eligible** for listing in the National Register of Historic Places, due to a lack of integrity and/or significance:

- Brandywine Village
- King of Prussia Arms Apartments
- Elwood Powell House
- Wills Building (Key No. 097653)
- Gatti Morrison Construction Materials
- Southern Wine and Spirits of Pennsylvania

- ProMetrics
- Pensalt Technological Center (Arkema Campus)
- Devon International Group

No Additional Information Due to Potential for Effect

We concur with the scope and level of effort utilized to identify historic properties for this project, appropriate pursuant to 36 CFR Part 800.4, on the following properties as individual resources; however, if the proposed project route changes or if the agency anticipates direct effects to the following property, additional information in the form of a Historic Resource Survey Form may be required (upon consultation with our office):

- McCoy Quarry

For questions and/or future consultation regarding this review, please contact Emma Diehl at emdiehl@pa.gov or (717) 787-9121.

Sincerely,



Douglas C. McLearn, Chief
Division of Archaeology and Protection



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

December 15, 2016

Mr. Dan Koenig
FTA
1760 Market Street, Suite 500
Philadelphia, PA 19103-4124

RE: ER 2013-1006-091-L: FTA – King of Prussia Rail Project, Upper Merion Township,
Montgomery County – Phase IA Archaeological Survey Report

Dear Mr. Koenig:

Thank you for providing information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 *et seq.* (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources. Our comments are as follows:

Archaeological Resources

Based on the results of this investigation, we agree with the recommendation that no further archaeological investigation is necessary within the APE-Archaeology.

If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900 or MShaffer@pa.gov.

Sincerely,

Douglas C. McLearn, Chief
Division of Archaeology and Protection