



Spire STL Pipeline Project

Draft Resource Report 4
Cultural Resources

FERC Docket No. PF16-9-000

Pre-filing draft
October 2016

Public



RESOURCE REPORT 4 - CULTURAL RESOURCES	
SUMMARY OF FILING INFORMATION	
Information	Found in
1. Initial cultural resources consultation and documentation, and documentation of consultation with Native Americans - Title 18 Code of Federal Regulations (CFR) part (§) 380.12(f)(1)(i) & (2)	Section 4.2
2. Overview/Survey Report(s) - 18 CFR § 380.12(f)(1)(ii) & (2)	Section 4.3 (to be provided in the FERC application)
INFORMATION RECOMMENDED OR OFTEN MISSING	
1. Identify the project area and the project’s impacts in terms of direct and indirect effects on cultural resources.	Section 4.3 (to be provided in the FERC application)
2. Provide a project map with mileposts clearly showing boundaries of all survey areas (right-of-way, extra work areas, access roads, etc.). Ensure mileposts are marked, and survey corridor widths are clearly specified, and clearly indicate where survey has not yet been completed.	Appendices 4-A and 4-B (to be provided in the FERC application)
3. Provide documentation of consultation with applicable State Historic Preservation Offices (SHPO), Tribal Historic Preservation Offices (THPO), and land-managing agencies regarding the need for and required extent of cultural resource surveys.	Section 4.2
4. Provide a narrative summary of overview results, cultural resource surveys completed, identified cultural resources and any cultural resource issues.	Section 4.3
5. Provide a project specific Ethnographic Analysis (can be part of Overview/Survey Report).	Appendices 4-A and 4-B (to be provided in the FERC application)
6. Identify by mileposts any areas requiring survey for which the landowner denied access.	To be determined



RESOURCE REPORT 4 - CULTURAL RESOURCES	
INFORMATION RECOMMENDED OR OFTEN MISSING	
Information	Found in
7. Provide written comments on the Overview and Survey Reports, if available, from the applicable SHPOs, THPOs, and land-managing agencies.	Section 4.3 (to be provided in the FERC application)
8. Provide a Summary Table of completion status of cultural resource surveys, and applicable SHPO or THPO and land-managing agency comments on the reports.	To be provided in the FERC application, as necessary.
9. Provide a Summary Table of identified cultural resources, and applicable SHPO or THPO and land-managing agency comments on the eligibility recommendations for those resources.	Section 4.3
10. Provide a brief summary of the status of federally recognized Indian tribe contact, including copies of all related correspondence and records of verbal communications.	Section 4.2
11. Provide a brief summary of comments received from stakeholders regarding cultural resources.	Section 4.2
12. Provide a schedule for completing any outstanding cultural resource studies.	Section 4.3
13. Provide an Unanticipated Discoveries Plan for the project area, referencing appropriate state statutes.	Section 4.4 and Appendix 4-C



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Appendices

- 4-A Illinois Cultural Resources Report (to be provided in the FERC application)
CONTAINS PRIVILEGED INFORMATION - DO NOT RELEASE
- 4-B Missouri Cultural Resources Report (to be provided in the FERC application)
CONTAINS PRIVILEGED INFORMATION - DO NOT RELEASE
- 4-C Draft Unanticipated Discoveries Plans for Illinois and Missouri



Acronyms and Abbreviations

APE	Area of Potential Effect
CFR	Code of Federal Regulations
FERC	Federal Energy Regulatory Commission
GAI	GAI Consultants, Inc.
IHPA	Illinois Historic Preservation Agency
MO SHPO	Missouri State Historic Preservation Office
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
Project	Spire STL Pipeline Project
SHPO	State Historic Preservation Office
Spire	Spire STL Pipeline LLC
STPs	Shovel test pits
USGS	United States Geological Survey



Cultural Resources

Spire STL Pipeline LLC (“Spire”) proposes 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. Resource Report 4 addresses the nature and significance of cultural resources, including archaeological sites and historic properties, within the Area of Potential Effect (“APE”) for the Project. It also summarizes the agency and Native American consultations, methods and results of investigations, newly identified resources, and plans for addressing the potential for unanticipated discoveries of cultural resources and/or human remains during Project-related activities.

4.1 Introduction

Cultural resource investigations for the Project were conducted in compliance with Section 106 [36 Code of Federal Regulations (“CFR”) 800] of the National Historic Preservation Act (“NHPA”) requiring all federal agencies, including the Federal Energy Regulatory Commission (“FERC”), to take into account, prior to authorizing an undertaking (e.g., the issuance of a FERC Certificate), the effect of that undertaking on cultural resources listed in or eligible for listing in the National Register of Historic Places (“NRHP”) (NRHP; 36 CFR 60). The NHPA and federal regulations also require federal agencies to consult with the appropriate State Historic Preservation Office (“SHPO”) and federally recognized Native American tribal organizations for undertakings with the potential to affect NRHP-listed or NRHP-eligible properties.

Spire has initiated consultation with the Illinois Historic Preservation Agency (“IHPA”), Missouri SHPO (“MO SHPO”), and federally recognized tribes. A summary of correspondence to date is described in Section 4.2. Copies of correspondence are included in Resource Report 1, Appendix 1-C. Further correspondence will be provided in Spire’s FERC application. Spire is coordinating with landowners for access for the cultural resource surveys. As the Project crosses a primarily agricultural landscape, cultural resource surveys will be completed after harvest, where possible. Further information on the proposed surveys is included in Section 4.3, along with the results of preliminary background research of previously identified cultural resources.

4.2 Initial Cultural Resources Consultation

This section contains a summary of the cultural resources consultations with the IHPA, MO SHPO, and federally recognized tribes that have occurred for the Project. A completed record of agency correspondence is provided in Resource Report 1, Appendix 1-C.

4.2.1 Consultation with the SHPOs

Spire met with the IHPA to introduce the Project on June 21, 2016. IHPA confirmed that surveys would be required, and provided guidance for the survey methods. Written initial consultation with the IHPA was submitted on August 29, 2016. Spire also provided the agency with a notice commencing the initiation of the FERC pre-filing process and an invitation to attend the Project’s open houses. On August 4, 2016, IHPA provided a letter



(IHPA Log #005080216) formally requesting a Phase I archaeological reconnaissance survey to locate, identify, and record all archaeological resources within the Project area. IHPA also requested photographs of structures in or adjacent to the Project area.

Spire met with the MO SHPO to introduce the Project on July 8, 2016 and August 3, 2016. MO SHPO confirmed that surveys would be required, and provided guidance for the survey methods. Written initial consultation with the MO SHPO was submitted on August 29, 2016. Spire also provided the agency with a notice commencing the initiation of the FERC pre-filing process and an invitation to attend the Project's open houses. Spire will continue to consult with the SHPOs and will provide additional correspondence in the FERC application.

4.2.2 Consultation with Native American Tribes

The Project does not occur within any property defined as Native American reservation or tribal lands. However, Spire coordinated with the SHPOs and other state agencies to identify federally recognized Native American tribal organizations that may have an interest in the Project area. Spire has provided information to the following 31 tribes:

- Absentee-Shawnee Tribe of Indians of Oklahoma;
- Delaware Nation;
- Delaware Tribe of Indians;
- Eastern Shawnee Tribe of Oklahoma;
- Iowa Tribe of Kansas and Nebraska;
- Iowa Tribe of Oklahoma;
- Kaw Indian Nation of Oklahoma;
- Kickapoo Tribe in Kansas;
- Kickapoo Traditional Tribe of Texas;
- Kickapoo Tribe of Oklahoma;
- Miami Tribe of Oklahoma;
- Osage Nation;
- Peoria Tribe of Indians of Oklahoma;
- Ponca Tribe of Nebraska;
- Ponca Tribe of Oklahoma;
- Citizen Potawatomi Nation;
- Forest County Potawatomi;
- Potawatomi Nation-Hannahville Indian Community;



- Pokagon Band of Potawatomi Indians;
- Prairie Band Potawatomi Nation;
- Quapaw Tribe of Oklahoma;
- Sac and Fox Tribe of the Missouri in Kansas and Nebraska;
- Sac and Fox Tribe of the Mississippi in Iowa;
- Sac and Fox Nation of Oklahoma;
- Ho-Chunk Nation;
- Winnebago Tribe of Nebraska;
- Huron Potawatomi Nation;
- Match-e-be-nash-she-wish Band of Potawatomi Indians of Michigan;
- Shawnee Tribe;
- Cherokee Nation; and
- United Keetoowah Band of Cherokee Indians of Oklahoma.

Spire attempted to contact each tribe by telephone to introduce the Project in June 2016 and October 2016. A letter providing information on the Project and a notice of the initiation of the FERC pre-filing process was submitted to each Tribe. Copies of these letters were provided by email when requested. Invitations to the open houses and FERC scoping meetings were submitted in August 2016 and October 2016. Spire will continue to provide information to the tribes, and understands that FERC will complete the required government to government consultation.

On August 12, 2016, the Miami Tribe of Oklahoma notified Spire of their intent to serve as a consulting party. The Miami Tribe of Oklahoma also submitted a comment to FERC in a letter on September 14, 2016. The Miami Tribe does not have an objection to the Project at this time, as they are not currently aware of specific sites in the Project area, and request immediate consultation should a discovery under the Native American Graves Protection and Repatriation Act occur.

In an August 16, 2016 email, the Osage Nation notified Spire of their intent to serve as a consulting party and requested a consultation meeting. On the same date, this was also submitted as a comment letter to FERC. Spire contacted the tribe via telephone and email and is awaiting further coordination on the request for a meeting.

The Quapaw Tribe of Oklahoma sent a letter to GAI Consultants, Inc. ("GAI") (Spire's archeological consultant) on August 24, 2016, requesting consulting party status for portions of the Project in St. Louis County, Missouri.

On September 22, 2016, GAI received a telephone call from the Kaw Indian Nation of Oklahoma requesting to be included in any tribal meetings related to the Project and requested a conference call to discuss the results of the cultural resource investigations.



Spire will continue to provide information to the tribes, and will provide FERC with any additional responses in the FERC application.

4.3 Cultural Resources Investigations

Background research and investigations will be completed for the 24-inch pipeline and the existing Line 880. APE for the 24-inch pipeline portion of the Project, which will consist of a 300-foot-wide study corridor centered on the proposed pipeline route, a 100-foot-wide study corridor for each access road, and study of the new Project M&R facilities and the proposed contractor yards. The APE for modifications to the existing Line 880 pipeline will include a 100-foot to 200-foot-wide study corridor along the existing pipeline and a 200-foot corridor in the area where a portion of the existing Line 880 will be relocated. Subsurface testing will be employed to determine if the existing right-of-way has been previously disturbed.

Systematic Phase I archaeological survey will be conducted in those portions of the proposed APE determined to contain moderate to high potential for yielding archaeological sites. Per the current accepted guidelines for Illinois and Missouri, previously plowed areas exhibiting at least 25 percent ground surface visibility will be surface collected by walking five-meter intervals to look for exposed artifacts. This will be supplemented by excavating shovel test pits (“STPs”) in small areas where surface visibility drops below the accepted threshold. In areas that have not been previously plowed, or large areas where surface visibility is below the 25 percent visibility threshold, subsurface testing will be conducted by excavating STPs at 15-meter intervals along transects spaced 15-meters apart. This methodology will be extended to all facets of the Project interpreted to have a moderate/high potential for site discovery. Each STP will measure at least 40 centimeters in diameter in Illinois and at least 25 centimeters in diameter in Missouri. STPs will be excavated to an average depth of 60 centimeters deep unless culturally sterile subsoil is reached first. Excavated soil will be screened through one-quarter-inch mesh to allow for systematic artifact recovery. If artifacts are recovered in STPs, radial STPs placed at five-meter intervals will be excavated around the perimeter of the cluster of positive STPs to more accurately define the archaeological site boundaries, per state guidelines.

Portions of the 24-inch pipeline will be located on floodplains that may have potential to contain buried soils. Spire will consult with IHPA and MO SHPO to establish a vertical APE for the Project in these settings.

Based on guidance from IHPA, Spire will complete a historic architectural survey within one-eighth-mile of the 24-inch pipeline in Illinois. Based on guidance from the MO SHPO, Spire will complete a historic architectural survey within the APE for the proposed 24-inch pipeline in Missouri, and resources directly adjacent to the proposed limits of disturbance for the Line 880 modifications. Architectural survey will serve to document the current condition of previously recorded architectural resources and identify previously unrecorded architectural resources, including buildings, objects, structures, sites, or districts within the APE that are 50 years old or older. These resources will be photographed with a digital camera and recorded from the public right-of-way or project APE, noting architectural style, condition, and important features. Architectural historians will also note any major changes or alterations as visible from the right-of-way, and individually map each property on United States



Geological Survey (“USGS”) maps. Photographs towards the proposed Project from each resource will also be obtained.

Following field survey, the identified architectural properties will be assessed for integrity and potential significance according to the NRHP Criteria of Evaluation, the historic context developed for this Project, and *National Register Bulletin 15-How to Apply the National Register Criteria of Evaluation* and *National Register Bulletin 30-Guidelines for Criteria for Evaluation and Documenting Rural Historic Landscapes*. Boundaries for potentially eligible historic resources and/or historic districts will be developed in accordance with *National Register Bulletin 21-Defining Boundaries for National Register Properties*. Potential effects of the proposed Project on potential NRHP-eligible resources will also be assessed.

Phase I archaeological surveys and reconnaissance for historic architectural resources will be conducted generally following harvest of crops. Field studies are anticipated to begin in October 2016 and are expected to be completed in December 2016. Follow-up surveys on inaccessible properties may be conducted in spring 2017.

Following completion of the Phase I survey of Project portions accessible in the 2016 field season (dependent upon onset of winter weather), draft Phase I Survey Reports describing the methods and results of the cultural resources investigations, including Project maps, graphics, and photographs, in accordance with SHPO’s guidelines will be developed. The reports are anticipated to be submitted to the IHPA and MO SHPO in January 2017. A copy of the reports will be provided as Appendices 4-A and 4-B in Volume II - Privileged Information, as part of the FERC application. Any necessary addendum surveys and reports of studies on inaccessible properties will be provided in spring 2017.

4.3.1 Previously Identified Cultural Resources

Background research was completed on the APE for the Project to gather information from previous cultural resource investigations and on known archaeological sites and historic architectural properties. Background research was acquired through an inventory search at the IHPA and MO SHPO offices. Additional online inventories were accessed by the use of the Inventory of Illinois Archaeological Sites Flex Archaeology Viewer, Illinois CRM Report Archive Database, and MO SHPO’s Historic Districts and Sites viewer and Archaeology Viewer. Cultural resources previously identified within the APE are described in Table 4.3-1.

Table 4.3-1. Previously Identified Cultural Resources within the APE

Site #	Site Name	County	Topography	Temporal Period	Site Type	NRHP Status	Treatment
Illinois							
GE00018	Charles Eby Site	Greene	Terrace	Unknown Prehistoric	Habitation	Not Eligible	No further study.
GE00188	-	Greene	Upland Ridge	Pioneer; Frontier	Unknown	Recommended for Phase II	Additional archaeological study.



Table 4.3-1. Previously Identified Cultural Resources within the APE (Continued)

Site #	Site Name	County	Topography	Temporal Period	Site Type	NRHP Status	Treatment
Illinois (continued)							
GE00307 ²	One Ceramic Site	Greene	Terrace	Late Woodland	Habitation	Recommended for Phase II	Additional archaeological study.
ST00327	-	Scott	Other Upland	Unknown Prehistoric	Unknown	Not Eligible	No further study.
ST00328	-	Scott	Other Upland	Unknown Prehistoric	Isolated Find	Not Eligible	No further study.
ST00329	-	Scott	Other Upland	Unknown Prehistoric	Isolated Find	Not Eligible	No further study.
ST00499 ²		Scott	Upland Ridge	Unknown Prehistoric	Habitation	Not Eligible	No further study.
ST00500	-	Scott	Bluffcrest	Unknown Prehistoric	Habitation	Not Eligible	No further study.
Missouri							
SC5	-	St. Charles	-	-	Indian Trail	Destroyed	No further study.
SC780	Portage Site #23	St. Charles	River/Stream Terrace	Unknown Prehistoric; Mississippian; Middle Woodland	Habitation	Unevaluated	Additional archaeological study.
SC1057	-	St. Charles	Floodplain Ridge	Early Industrial; Urban Industrial	Habitation	Portion Recommended Not Eligible	Additional archaeological study.
SL64	-	St. Louis	Floodplain	Paleo-Indian; Archaic; Middle Woodland; Late Woodland; Middle Mississippian	Village Site	Unevaluated	Additional archaeological study.
SL157 ¹	Lavien Site	St. Louis	Ridge	Archaic	Habitation	Unevaluated	Additional archaeological study.
SL158 ¹	Tuco Site	St. Louis	Ridge	Archaic	Habitation	Unevaluated	Additional archaeological study.
SL527 ¹	Coldwater Creek Site #43	St. Louis	Hilltop	Mississippian	Habitation	Unevaluated	Additional archaeological study.
SL535 ¹	Coldwater Site #51	St. Louis	Hilltop	Unknown Prehistoric	Habitation	Unevaluated	Additional archaeological study.

Notes:

¹ Site occurs along the proposed Line 880.

² Within access road APE.

Sixteen previously identified archaeological sites extend into the defined APE. No historic or architectural resources are located within the Project’s direct APE. Eight of these archaeological resources are located in Greene and Scott Counties, Illinois, while the remaining eight resources are within St. Charles and St. Louis Counties,



Missouri. Two of these archaeological sites have been recommended for Phase II archaeological testing, six have been previously determined as Not Eligible for listing in the NRHP, portions of one site were previously recommended not eligible, one site is recorded as being destroyed, and the remaining six sites have not been evaluated for NRHP eligibility.

Site GE00188 is situated along the south side of Greene County Road 1000N in Illinois. The current Project crosses the eastern third of the recorded site boundaries. This site was identified in 1995, during a pedestrian reconnaissance by the Archaeological Resource Center of St. Louis, Inc. The survey recovered a light historic scatter and one prehistoric isolated find. The historic scatter contained ceramics and glass that are associated with the Pioneer (1781-1840) and Frontier (1841-1870) temporal periods. Site GE00188 was previously recommended for Phase II archaeological testing. Phase I archaeological survey should be conducted to confirm that the site is located within the current Project APE. If the site is re-identified, additional archaeological study (Phase II archaeological testing) may be required to determine its NRHP status if the Project cannot otherwise avoid this site.

Site GE00307 is situated on a terrace in a cultivated field. A portion of the site is crossed by a proposed access road for the current project. This site was identified in 1995 during a survey by the Center for American Archeology for a proposed four lane highway. The site is a small artifact scatter of lithic flakes and one prehistoric ceramic, dating the site from the Late Woodland. Site GE00307 was previously recommended for Phase II archaeological testing. Phase I archaeological survey should be conducted to confirm that the site is located within the current Project APE. If the site is re-identified, additional archaeological study (Phase II archaeological testing) may be required to determine its NRHP status if the Project cannot otherwise avoid this site.

Six previously recorded archaeological sites (GE00018, ST00327, ST00328, ST00329, ST00499, and ST00500) in Illinois were determined to be Not Eligible for listing the NRHP. All but one of these resources (GE00018) were identified as a result of previous archaeological surveys. All six sites have an unknown prehistoric temporal affiliation. No additional archaeological survey is recommended at these five site locations.

Site SC1057 was identified in Missouri during a Phase I survey for the Keystone Pipeline Project in 2016. The portions of the site located within the study corridor of the Keystone Pipeline Project were determined to be Not Eligible for listing in the NRHP. Additional Phase I testing in locations outside of the Keystone Pipeline Project study corridor will be necessary to determine if portions of this site potentially eligible for the NRHP are located within the current Project APE.

Site SC5 in Missouri is a Sioux Indian trail that is recorded as being destroyed. No further study specific to identifying this trail is recommended, however Phase I archaeological survey may be conducted in the vicinity if field conditions warrant such study to look for other sites.

Site SL64 is located along the Missouri River in St. Louis County, Missouri. The Project study corridor intersects the southern edge of the site. The site was recorded in 1957 as a prehistoric village. Artifacts recovered from this site include projectile points, knives, drills, scrapers, ground axes, and celts. These artifacts date to the Paleo-Indian, Archaic, Middle Woodland, Late Woodland, and Middle Mississippian temporal affiliations. Modern topographic quadrangles and aerial photographs indicates that portions of the APE near this site have been disturbed from



quarry activities. Phase I archaeological survey will take place in this location to determine if intact portions of this site exist within the Project APE.

The remaining five previously recorded archaeological sites (SC780, SL157, SL158, SL527, and SL535) are located in Missouri and remain unevaluated for NRHP eligibility. Additional Phase I archaeological survey will be conducted at these locations within the APE.

4.3.2 Archaeological Survey Results

Spire commenced field surveys in October 2016. A summary of the results of the archaeological survey will be provided in the FERC application. Archaeological resources identified within the APE are provided as Table 4.3-2. Phase I Survey Reports will be provided as Appendices 4-A and 4-B in Volume II - Privileged Information, as part of the FERC application.

Table 4.3-2. Archaeological Resources Identified within the APE

Facility, County, and Resource ID	Resource Type	Applicant NRHP Assessment	Applicant Recommendations	SHPO Comments
24-Inch Pipeline				
Scott, Illinois				
TBD	TBD	TBD	TBD	TBD
Greene, Illinois				
TBD	TBD	TBD	TBD	TBD
Jersey, Illinois				
TBD	TBD	TBD	TBD	TBD
St. Charles, Missouri				
TBD	TBD	TBD	TBD	TBD
St. Louis, Missouri				
TBD	TBD	TBD	TBD	TBD
Line 880				
St Louis, Missouri				
TBD	TBD	TBD	TBD	TBD



4.3.3 Historic Architectural Survey Results

Spire commenced architectural surveys in October 2016. Historic architectural resources identified within the APE are provided in Table 4.3-3. A summary of the results of the historic architectural survey will be provided in the FERC application. Phase I Survey Reports will be provided as Appendices 4-A and 4-B in Volume II - Privileged Information, as part of the FERC application.

Table 4.3-3. Historic Architectural Resources Identified within the APE

Facility, County, and Resource ID	Resource Type	Applicant NRHP Assessment	Applicant Recommendations	SHPO Comments
24-Inch Pipeline				
Scott, Illinois				
TBD	TBD	TBD	TBD	TBD
Greene, Illinois				
TBD	TBD	TBD	TBD	TBD
Jersey, Illinois				
TBD	TBD	TBD	TBD	TBD
St. Charles, Missouri				
TBD	TBD	TBD	TBD	TBD
St. Louis, Missouri				
TBD	TBD	TBD	TBD	TBD
Line 880				
St Louis, Missouri				
TBD	TBD	TBD	TBD	TBD

4.4 Unanticipated Discoveries Plan for Cultural Resources

Spire proposes implementation of the procedures outlined in the draft Unanticipated Discoveries Plan for Cultural Resources presented as Appendix 4-C. In October 2016, this plan was submitted to the IHPA and the MO SHPO for



their review and comment. Neither agency has provided comments to date on the plan. Copies of this plan will be kept on-site during construction, and environmental inspectors will be trained on the procedures.



APPENDIX 4-A

Illinois Cultural Resources Report

CONTAINS PRIVILEGED INFORMATION - DO NOT RELEASE

(to be included in the FERC application)



APPENDIX 4-B

Missouri Cultural Resources Report

CONTAINS PRIVILEGED INFORMATION - DO NOT RELEASE

(to be included in the FERC application)



APPENDIX 4-C

Draft Unanticipated Discovery Plans for Illinois and Missouri



Spire STL Pipeline Project

Unanticipated Discoveries Plan
for Cultural Resources in Illinois

FERC Docket No. PF16-9-000

Draft
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Public



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Acronyms and Abbreviations

FERC	Federal Energy Regulatory Commission
IHPA	Illinois Historic Preservation Agency
NHPA	National Historic Preservation Act of 1966
NRHP	National Register of Historic Places
Project	Spire STL Pipeline Project
Spire	Spire STL Pipeline LLC



Unanticipated Discoveries Plan for Cultural Resources in Illinois

This Unanticipated Discoveries Plan details the procedures that will be implemented by Spire STL Pipeline LLC ("Spire") and its contractors to handle the unanticipated discovery of cultural resources that may be encountered during construction of the proposed Spire STL Pipeline Project ("Project"). This plan was developed in accordance with 36 Code of Federal Regulations 800.13 (Post-Review Discovery clause), as well as the following regulations:

- Illinois Historic Preservation Agency's ("IHPA's") *Guidelines for Archaeological Reconnaissance Survey/Reports* (IHPA, undated);
- Illinois State Agency Historic Resources Preservation Act (20 ILCS 3420);
- Illinois Archaeological and Paleontological Resources Protection Act (20 ILCS 3435); and,
- Illinois Human Skeletal Remains Protection Act (20 ILCS 3440).

All construction work force members have the responsibility to monitor construction sites for potential archaeological remains throughout construction. Archaeological remains consist of man-made objects or features greater than 50 years of age. These remains include, but are not limited to, items such as artifacts (e.g., stone flakes, stone tools, ceramics, glass, and architectural material), fire pits, building foundations, and human remains. If, during the course of construction, potential archaeological remains are identified, the Environmental or Chief Inspector will immediately halt work in the vicinity (minimum of 25 feet) of the potential find. The Environmental Inspector will notify the Spire Environmental Project Manager. Work in the immediate area of the discovery will not resume until treatment of the discovery has been completed.

The Spire Environmental Project Manager will notify the IHPA and the Federal Energy Regulatory Commission ("FERC"), and will hire a state-approved archaeological consultant who will evaluate the site and provide an immediate verbal recommendation to Spire and the IHPA regarding the eligibility status of the site. Spire's Environmental Manager will notify FERC of the recommendation and continue to consult with the IHPA's office, as per the requirements of Section 106 of the National Historic Preservation Act of 1966 ("NHPA"). Communications, such as consultation, transmittals, and reports may be provided via e-mail, as appropriate and acceptable to each agency. Contact information for the various agencies is listed below:

Environmental Inspector

To be determined

Chief Inspector

To be determined



Spire Environmental Project Manager

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russell.english@SpireEnergy.com

Spire Project Manager

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IHPA

Rachel Leibowitz
Division Manager and Deputy State Historic Preservation Office
Illinois Historic Preservation Agency
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rachel.leibowitz@illinois.gov

FERC

Laurie Boros
Archaeologist
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, D.C. 20426
202-502-8046
laurie.boros@ferc.gov

Greene County Coroner

Dean Bishop
P.O. Box 207
Greenfield, Illinois 62044
217-368-2202

Greene County Sheriff's Office

403 7th Street
Carrollton, Illinois 62016
217-942-6901



Jersey County Coroner

Larry Alexander
108 North Liberty
Jerseyville, Illinois 62052
618-498-2711

Jersey County Sheriff's Office

114 North Washington
Jerseyville, Illinois 62052
618-498-6881

Scott County Coroner

David King, Jr.
35 East Market Street
Winchester, Illinois 62094
217-742-3141

Scott County Sheriff's Office

35 East Market Street
Winchester, Illinois 62094
217-742-5217

If the unanticipated discovery is determined to be ineligible for inclusion in the National Register of Historic Places ("NRHP"), Spire will proceed with construction following written concurrence from the IHPA and approval from FERC. If the site is determined to be potentially eligible for inclusion in the NRHP, additional work, such as a Determination of Eligibility or Data Recovery, will be performed as required/approved by the IHPA and FERC. Further construction work at the site will be suspended until all criteria of Section 106 of the NHPA and other related federal and state regulations have been successfully completed. Construction activities will be kept a minimum of 25 feet from the site (dependent on the site type, location, construction design, and agency consultation) and separated from the site by temporary fencing.

In the event that human remains are discovered during construction, the Environmental or Chief Inspector will immediately halt work and notify the Spire Environmental Project Manager, the county coroner's office, and the IHPA. If the county coroner is not available, the Environmental Inspector will contact the local law enforcement agency. The Environmental Inspector will ensure that human remains are protected from further damage, intrusion, or removal until proper examinations can be performed. Provision for security to protect suspected burials from vandalism will be taken, including monitoring of the area. Discovery of human remains should not be made public, including but not limited to, conversations with local residents, posting on social media, or communication with news outlets. Construction activities including vehicle traffic will be kept a minimum of 25 feet from the remains (dependent on the location, construction design, and agency consultation) and separated by temporary fencing. If remains are found not to be of recent origin, the Spire Environmental Project Manager will contact the IHPA and FERC to ensure that relevant laws are followed. As soon as a determination has been



made that the human remains are Native American, FERC will contact appropriate tribal representatives for the region in which the remains were found. If the remains are not Native American and not associated with a crime scene, FERC and the Spire Environmental Project Manager will take into account guidance in *National Register Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places* (Potter and Boland 1992). A reasonable attempt will be made to identify the next of kin. Spire's Environmental Manager will notify FERC of the situation and will continue to keep FERC informed as to the progress of further consultation. Spire will attempt to redesign the Project to avoid impact to the human remains. Only if avoidance is not possible will Spire proceed with removal of the human remains.

If the unanticipated discovery of human remains is determined by the IHPA and FERC to be ineligible for inclusion in the NRHP, Spire will proceed with coordinating the proper removal of the remains through cooperation from the local police, the medical examiner, the IHPA, and FERC. Only after the human remains have been properly removed from the site should construction of the pipeline facilities in the site area be resumed.

Under no circumstances should human remains be removed from the site without completing all permitting and coordination processes with the local police, the medical examiner, the IHPA, Native American representatives as appropriate, and FERC. Further work at the site will be suspended until all criteria of Section 106 of the NHPA and other related state and federal regulations have been successfully completed.

1.1 References

Potter E. W. and B. M. Boland. 1992. *National Register Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places*. United States Department of the Interior, National Park Service. Washington, D.C.

Illinois Historic Preservation Agency. Undated. *Guidelines for Archaeological Reconnaissance Survey/Reports*. Illinois Historic Preservation Agency, Springfield. Accessed electronically, September 2016, <https://www.illinois.gov/iHPA/Preserve/Pages/Archaeology.aspx>.



Spire STL Pipeline Project

Unanticipated Discoveries Plan
for Cultural Resources in Missouri

FERC Docket No. PF16-9-000

Draft
October 2016

Public



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Acronyms and Abbreviations

FERC	Federal Energy Regulatory Commission
MDNR	Missouri Department of Natural Resources
NHPA	National Historic Preservation Act of 1966
NRHP	National Register of Historic Places
Project	Spire STL Pipeline Project
SHPO	State Historic Preservation Office
Spire	Spire STL Pipeline LLC



Unanticipated Discoveries Plan for Cultural Resources in Missouri

This Unanticipated Discoveries Plan details the procedures that will be implemented by Spire STL Pipeline LLC (“Spire”) and its contractors to handle the unanticipated discovery of cultural resources that may be encountered during construction of the proposed Spire STL Pipeline Project (“Project”). This plan was developed in accordance with 36 Code of Federal Regulations 800.13 (Post-Review Discovery clause), as well as the following regulations:

- the Missouri Department of Natural Resources’ (“MDNR”) *Guidelines for Archaeological Survey and Reports* (MDNR, undated); and
- Missouri Revised Statute 194.400 through 194.410 (Unmarked Human Burial Sites)

All construction work force members have the responsibility to monitor construction sites for potential archaeological remains throughout construction. Archaeological remains consist of man-made objects or features greater than 50 years of age. These remains include, but are not limited to, items such as artifacts (e.g., stone flakes, stone tools, ceramics, glass, architectural material), fire pits, building foundations, and human remains. If, during the course of construction, potential archaeological remains are identified, the Environmental or Chief Inspector will immediately halt work in the vicinity (minimum of 25 feet) of the potential find. The Environmental Inspector will notify the Spire Environmental Project Manager. Work in the immediate area of the discovery will not resume until treatment of the discovery has been completed.

The Spire Environmental Project Manager will notify the Missouri State Historic Preservation Office (“SHPO”) and the Federal Energy Regulatory Commission (“FERC”), and will hire a state-approved archaeological consultant who will evaluate the site and provide an immediate verbal recommendation to Spire and the Missouri SHPO regarding the eligibility status of the site. Spire’s Environmental Manager will notify FERC of the recommendation and continue to consult with the Missouri SHPO, as per the requirements of Section 106 of the National Historic Preservation Act of 1966 (“NHPA”). Communications, such as consultation, transmittals, and reports, may be provided via e-mail, as appropriate and acceptable to each agency. Contact information for the various agencies is listed below:

Environmental Inspector

To be determined

Chief Inspector

To be determined



Spire Environmental Project Manager

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Spire Project Manager

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Missouri SHPO

Ms. Judith Deel
Compliance Coordinator
Missouri Department of Natural Resources
State Historic Preservation Office
P.O. Box 176
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573-751-7862
judith.deel@dnr.mo.gov

FERC

Laurie Boros
Archaeologist
Federal Energy Regulatory Commission
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Washington, D.C. 20426
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laurie.boros@ferc.gov

St. Charles County Police Department

101 Sheriff Dierker Court
O'Fallon, Missouri 63366
636-949-3000

St. Louis County Police Department

7900 Forsyth Boulevard
St. Louis, Missouri 63105
636-529-8210



If the unanticipated discovery is determined to be ineligible for inclusion in the National Register of Historic Places (“NRHP”), Spire will proceed with construction following written concurrence from the Missouri SHPO and approval from FERC. If the site is determined to be potentially eligible for inclusion in the NRHP, additional work, such as a Determination of Eligibility or Data Recovery, will be performed as required/approved by the Missouri SHPO and FERC. Further construction work at the site will be suspended until all criteria of Section 106 of the NHPA and other related federal and state regulations have been successfully completed. Construction activities will be kept a minimum of 25 feet from the site (dependent on the site type, location, construction design, and agency consultation) and separated from the site by temporary fencing.

In the event that human remains are discovered during construction, the Environmental or Chief Inspector will immediately halt work and notify the Spire Environmental Project Manager, the local law enforcement agency, and the Missouri SHPO. The Environmental Inspector will ensure that human remains are protected from further damage, intrusion, or removal until proper examinations can be performed. Provision for security to protect suspected burials from vandalism will be taken, including monitoring of the area. Discovery of human remains should not be made public, including but not limited to, conversations with local residents, posting on social media, or communication with news outlets. Construction activities including vehicle traffic will be kept a minimum of 25 feet from the remains (dependent on the location, construction design, and agency consultation) and separated by temporary fencing. If remains are found not to be of recent origin, the Spire Environmental Project Manager will contact the Missouri SHPO and FERC to ensure that relevant laws are followed. As soon as a determination has been made that the human remains are Native American, FERC will contact appropriate tribal representatives for the region in which the remains were found. If the remains are not Native American and not associated with a crime scene, FERC and the Spire Environmental Project Manager will take into account guidance in *National Register Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places* (Potter and Boland 1992). A reasonable attempt will be made to identify the next of kin. Spire’s Environmental Manager will notify FERC of the situation and will continue to keep FERC informed as to the progress of further consultation. Spire will attempt to redesign the Project to avoid impact to the human remains. Only if avoidance is not possible will Spire proceed with removal of the human remains.

If the unanticipated discovery of human remains is determined by the Missouri SHPO and FERC to be ineligible for inclusion in the NRHP, Spire will proceed with coordinating the proper removal of the remains through cooperation from the local police, the medical examiner, the Missouri SHPO, and FERC. Only after the human remains have been properly removed from the site should construction of the pipeline facilities in the site area be resumed.

Under no circumstances should human remains be removed from the site without completing all permitting and coordination processes with the local police, the medical examiner, the Missouri SHPO, Native American representatives as appropriate, and FERC. Further work at the site will be suspended until all criteria of Section 106 of the NHPA and other related state and federal regulations have been successfully completed.



1.1 References

Potter E. W. and B. M. Boland. 1992. *National Register Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places*. United States Department of the Interior, National Park Service. Washington, D.C.

Missouri Department of Natural Resources. Undated. *Guidelines for Archaeological Survey and Reports*. Missouri Department of Natural Resources, State Historic Preservation Office, St. Louis. Accessed electronically, September 2016, <http://dnr.mo.gov/shpo/sectionrev.htm>.