



# COMMONWEALTH of VIRGINIA

Molly Joseph Ward  
Secretary of Natural Resources

**Department of Historic Resources**  
2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan  
Director

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January 11, 2018

Mr. Brian Clauto  
Mountain Valley Pipeline  
2200 Rice Drive  
Canonsburg, PA 15317

Re: *Mountain Valley Pipeline Project Supplemental Phase I Archaeological Survey Report of Tract VA-RO-054 and Phase II Archaeological Evaluation Report of Sites 44RN0400 and 44RN0401, Roanoke County, Virginia* (September 2017)  
DHR File No. 2014-1194; FERC #PF15-3-000

Dear Mr. Clauto:

The Department of Historic Resources (DHR) has received for review the report referenced above prepared by Tetra Tech for Mountain Valley Pipeline, LLC (MVP). It is our opinion that this report meets DHR's *Survey Guidelines* and other applicable standards. We provide the following comments as assistance to MVP and the Federal Energy Regulatory Commission in meeting their collective responsibilities under Section 106 of the National Historic Preservation Act.

The supplemental archaeological survey did not identify any previously unrecorded resources, but expanded the boundaries of sites 44RN0400 and 44RN0401. The Phase II evaluation considered the eligibility of the two previously-recorded sites for listing in the National Register of Historic Places (NRHP). The archaeological subcommittee of our Department's National Register Eligibility Evaluation Team concurs that sites **44RN0400** and **44RN0401** are *eligible* for listing in the NRHP. We understand that full avoidance of these sites is not feasible and that the project will adversely affect these resources.

To address the adverse effect to sites 44RN0400 and 44RN0401, an *Amended Treatment Plan* (September 2017) was prepared and submitted for our review. The proposed treatment for each site includes protection of sites elements outside of the limits of disturbance (LOD) and archaeological data recovery, utilizing a combination of test unit excavation and mechanical stripping, within the LOD. Public outreach will also be completed, including the public and professional dissemination of results through pamphlets, websites, and conference presentations. We concur with the proposed treatment of sites 44RN0400 and 44RN0401.

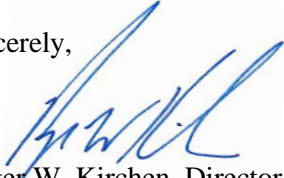
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If you have any questions regarding these comments or our review of this project, please do not hesitate to contact me at [roger.kirchen@dhr.virginia.gov](mailto:roger.kirchen@dhr.virginia.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Kirchen', is written over a light blue rectangular background.

Roger W. Kirchen, Director  
Review and Compliance Division

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