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EEO/AA Employer

October 17, 2018

Mr. Paul Friedman
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Mountain Valley Pipeline Project
FERC Docket No. CP 16-10
Variances: Laydown Yard MVP-LY-064 (ext)
Workspace MVP-ATWS-Delta Road 9
FR: 15-67-MULTI-125

Dear Mr. Friedman:

We have reviewed the information that was submitted for the abovementioned undertaking. As required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, U.S. 36 CFR § 800: "Protection of Historic Properties," we submit our comments.

According to the submitted information, Mountain Valley Pipeline (MVP) proposes two (2) variances—a laydown yard and a workspace area—for use in constructing the aforementioned pipeline. No tree-clearing or new construction of aboveground pipeline facilities are proposed in association with these two variances. The direct and indirect areas of potential effect (APE) are consistent with that for the previously surveyed pipeline corridor.

Archaeological Resources:

Archaeological survey of the proposed variances resulted in the documentation of extensive prior disturbance within the proposed laydown yard that precluded the excavation of shovel probes. Survey of the proposed workspace resulted in the identification of one new prehistoric isolated find, 46ME346. The isolated find consists of a single secondary lithic flake recovered from the A horizon. Radial shovel probes were negative for additional cultural materials. Due to the paucity of material remains, we concur that 46ME346 is not eligible for inclusion in the National Register of Historic Place. We also concur that no further archaeological investigation is necessary and that use of the area will have no effect on archaeological historic properties.

Architectural Resources:

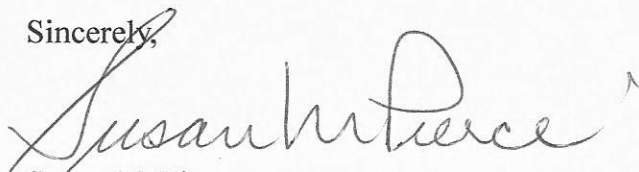
We have reviewed the submitted information and concur no further consultation is necessary regarding the aforementioned project elements. Use of the two (2) variance areas will require no tree clearance, and no above-ground properties have been identified within the defined direct areas of

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potential effect (APEs). A handful of architectural properties are located within view of the workspace and laydown yard, but available historical mapping and imagery indicate none of those properties are older than fifty years of age. No further consultation is necessary regarding architectural resources; however, we ask that you contact our office if the project should change.

We appreciate the opportunity to be of service. *If you have questions regarding our comments or the Section 106 process, please contact Lora A. Lamarre-DeMott, Senior Archaeologist, or Mitchell K. Schaefer, Structural Historian, at (304) 558-0240.*

Sincerely,

A handwritten signature in cursive script that reads "Susan M. Pierce". The signature is written in dark ink and is positioned above the typed name and title.

Susan M. Pierce
Deputy State Historic Preservation Officer

SMP/LLD/MKS

CC: Ms. Evelyn Tidlow, GAI Consultants