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EEO/AA Employer

December 7, 2016

Ms. Megan Landfried Neylon  
Senior Environmental Coordinator  
Mountain Valley Pipeline, LLC.  
625 Liberty Avenue, Suite 1700  
Pittsburgh, Pennsylvania 15222

RE: Mountain Valley Pipeline Project  
Cultural Resources Survey Report Addendum 1 to Volume I  
Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia  
FR# 15-67-MULTI-28

Dear Ms. Neylon:

We have reviewed the report, *Mountain Valley Pipeline Project, Cultural Resources Survey, Addendum 1 to Volume I, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia*, which was submitted in order to determine project effects to cultural resources. 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 report, changes have been made to the proposed route for the Mountain Valley Pipeline. It is our understanding that the currently proposed route was filed with FERC in October 2016 and is known as the October 2016 Proposed Route. The Addendum 1 to Volume I report presents the results of cultural resource surveys conducted within this newly proposed route in Wetzel, Harrison, Doddridge and Lewis Counties, WV. The Area of Potential Effect (APE) that has been defined for this survey is consistent with the APE for the previously considered pipeline corridor.

Archaeological Resources:

Systematic archaeological survey within Wetzel, Harrison, Doddridge and Lewis Counties, WV covered 2,928 acres, which were divided into 178 archaeological test areas. Due to land access issues, 86.03 acres remain to be surveyed across these counties. It is our understanding that these areas will be surveyed at a later date and discussed in addendum reports. Much of the proposed study area was observed to consist of steep terrain or to have been previously disturbed. These areas were surveyed via pedestrian reconnaissance. The remainder of the study area underwent subsurface investigation. In total, 1,812 shovel probes were excavated, 184 of which were positive for archaeological materials. This resulted in the documentation of 25 archaeological sites (46WZ149, 46WZ150, 46WZ152, 46HS122, 46HS123, 46HS124, 46HS125, 46HS126, 46HS127, 46HS128, 46HS129, 46HS130, 46HS140, 46DO106, 46DO107, 46DO108, 46DO109, 46LE92, 46LE93, 46LE94, 46LE95, 57LE98 and 46LE99) and 18 isolated finds (45WZ154, 46HS131 – 46HS139, 46HS141, 46HS142, 46DO110, 46DO111, 46LE96, 46LE97, 46LE101 and 46LE102).

In general, the isolated finds consist of three or fewer artifacts associated with either the prehistoric or historic era. Supplementary shovel probing at closer intervals did not result in the recovery of additional

artifacts. Due to the paucity of material remains and the lack of cultural features, we concur that these resources are not eligible for inclusion in the National Register of Historic Places and that no further work is needed.

Sites 46WZ150, 46WZ152, 46HS122, 46HS124, 46DO106, 46DO109 and 46LE94 are described as historic era field scatters dating to the late 19<sup>th</sup> and/or 20<sup>th</sup> centuries. Sites 46HS123, 46HS127, 46HS129, 46DO107, 46LE93 and 46LE95 are identified as historic era home/farmsteads dating from the late 19<sup>th</sup> and/or 20<sup>th</sup> centuries. Although early 20<sup>th</sup> century topographic maps depict structures within their general vicinity (except for 46DO106, the associated structure of which only appears on a 1964 map), no cultural features were identified at any of the sites. In general, the artifact assemblages include few to no diagnostic artifacts. With the exception of 46HS127 where stacked piles of concrete, cut stone and boulder debris were observed, the sites produced few to no architectural artifacts. Consequently, we concur that these sites are not eligible for inclusion in the National Register of Historic Places and that no further work is necessary.

Sites 46HS128, 46HS130, 46DO108, 46LE98 and 46LE99 are described a low density prehistoric lithic scatters of unknown age. None of the sites produced diagnostic artifacts, tools or evidence suggesting the presence of cultural features. Consequently, we concur that these sites are not eligible for inclusion in the National Register of Historic Places and warrant no further investigation. Site 46HS125 is a low density prehistoric lithic scatter that was identified subsequent to the submission of the initial Volume I report and underwent a Phase II National Register evaluation earlier this year. We concurred in our July 14, 2016 letter that it is not eligible for inclusion in the National Register of Historic Places.

Site 46HS126 is described as a 20<sup>th</sup> century site of unknown function. The site consists of a concrete pad with two abutments and a trough along its western edge, asbestos tiles and 127 artifacts, one of which is an isolated prehistoric lithic flake. Artifacts are comprised of household, architectural, miscellaneous and unidentified items and are primarily non-diagnostic. The function of the feature could not be determined and the artifacts are thought to be associated with a trash dump that is located outside of the APE. We concur that the site lacks research potential and is not eligible for inclusion in the National Register of Historic Places.

Site 46WZ151 is identified as an historic era home/farmstead dating from the late 19<sup>th</sup> through the early 20<sup>th</sup> centuries. The site consists of the remains of a burnt structure and 570 artifacts, ten percent of which have been heat damaged. Site 46LE100 is a multicomponent site comprised of a diffuse low-density lithic scatter and an historic era home/farmstead dating from the late 19<sup>th</sup> century through the present. Two shallow depressions where a house and large outbuilding were likely located were identified within the site boundaries. However, both sites exhibited disturbed soils indicating they lack integrity. Consequently, we concur that 46WZ151 and 46LE100 are not eligible for inclusion in the National Register of Historic Places.

Site 46WZ149 is identified as an industrial site associated with oil exploration of the I.D. Morgan Farm in the Smithfield Oilfield from the late 19<sup>th</sup> through early 20<sup>th</sup> centuries. Three features and an assemblage of 77 artifacts were identified. The features consist of a large concrete foundation that possibly served as a holding facility/tank for oil, a set of three parallel concrete walls the function of which is currently unknown, and a concrete sluice. All of the artifacts were recovered from the interior of the concrete foundation and are primarily comprised of degraded iron fragments. Sites 46HS140 and 46LE92 are prehistoric lithic scatters dating to the Late Archaic and Early Archaic periods, respectively. Each site produced diagnostic artifacts,

tools and other evidence suggesting that cultural features may be present. It is our understanding that these sites will be avoided by the proposed project by shifting the pipeline and the access road corridors and by placing jersey barriers or other protective fencing between the site and the construction area. None of these sites have been formally assessed for the eligibility to be included in the National Register of Historic Places, but because 46WZ149, 46HS140 and 46LE92 will be avoided by the proposed, we concur that the proposed project will have no effect on them.

In summary, upon review of the submitted report, we concur with the recommendations made. We concur that sites 46WZ150, 46WZ152, 46HS122, 46HS123, 46HS124, 46HS125, 46HS126, 46HS127, 46HS128, 46HS129, 46HS130, 46DO106, 46DO107, 46DO108, 46DO109, 46LE93, 46LE94, 46LE95, 57LE98 and 46LE99 and isolated finds 45WZ154, 46HS131 – 46HS139, 46HS141, 46HS142, 46DO110, 46DO111, 46LE96, 46LE97, 46LE101 and 46LE102 are not eligible for inclusion in the National Register of Historic Places. No further work is necessary for these sites. We also concur that the proposed project will have no effect on 46WZ149, 46HS140 and 46LE92 provided that they continue to be avoided. Again, please notify this office if the current boundaries changes so that we may provide further comment.

Architectural Resources:

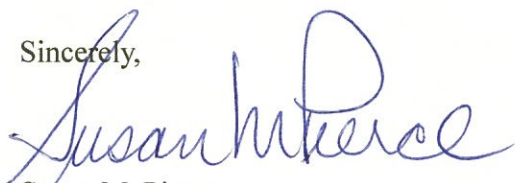
The aforementioned Addendum 1 to Volume 1 report indicates that no additional above-ground or architectural properties, other than the two (2) cemeteries discussed below, are located within the modified direct and indirect APEs in Wetzel, Harrison, Doddridge, and Lewis Counties. We will provide further comments upon receipt of the anticipated addendum reports.

Cemetery Resources:

The survey also resulted in the identification of two cemeteries, the Coastal Timberlands Company Property Cemetery (46-WZ-153) and the Watson Property Cemetery (46-DO-112), and a modern period burial of a stillborn infant, which was not documented due to its recent nature. We concur with Tetra Tech's recommendations that these two cemeteries are not eligible for inclusion in the National Register under Criteria A, B, C, or D, nor do they meet the standards set forth in Criteria Considerations C or D. We will provide further comments upon receipt of the anticipated addendum reports.

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

Sincerely,



Susan M. Pierce  
Deputy State Historic Preservation Officer

SMP/MKS/LLD