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EEO/AA Employer

December 8, 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 II  
Braxton and Webster Counties, West Virginia  
FR# 15-67-MULTI-30

Dear Ms. Neylon:

We have reviewed the report, *Mountain Valley Pipeline Project, Cultural Resources Survey, Addendum 1 to Volume II, Braxton and Webster 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 includes minor shifts in the proposed alignment and the addition, reduction, and/or elimination of temporary workspaces, laydown areas and access roads. The Addendum 1 to Volume II report presents the results of cultural resource surveys conducted within areas where the alignment has been shifted in Braxton and Webster 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 Braxton and Webster Counties, WV covered 2,177 acres. Due to land access issues, 7.39 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, 873 shovel probes were excavated resulting in the documentation of five new archaeological sites, 46BX131, 46WB437, 46WB438, 46WB439, and 46WB440 and two new isolated finds, 46BX130 and 46WB436, and in the re-identification of previously documented site 46WB418.

Isolated find 46BX130 produced a single piece of stoneware, while 46WB436 yielded the base from a projectile point/knife. Supplementary shovel probing at closer intervals did not result in the recovery of additional artifacts from either resource. 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.

Site 46BX131 is a multicomponent site comprised of two negligible prehistoric lithic flakes and an historic era artifact scatter. The historic era artifact assemblage consists primarily of kitchen and architectural items and is generally indicative of a late 19<sup>th</sup> through early 20<sup>th</sup> century occupation. This is supported by historic maps, which depict a structure at this location circa 1906. Although no cultural features were identified, a small section of stacked stones that may be associated with the site is located outside of the APE. Located in the general Burnsville area, the site could be associated with the town's early history. It is our understanding that 46BX131, which has not been evaluated for its National Register eligibility, will be avoided by the proposed project by adjusting the LOD to avoid ground disturbing activities within the site's boundaries. In addition, the boundaries will be marked with temporary construction fencing. Provided that this occurs, we concur the proposed project will have no effect to 46BX131.

Sites 46WB437 and 46WB438 are identified as historic era artifact scatters and structural remains associated with the early 20<sup>th</sup> century lumber industry. The artifact assemblage at 46WB437 includes corrugated metal roofing, wire nails, a modern tire and a rusted shovel blade, all of which were observed on the ground surface. At 46WB438, the artifact assemblage consists of one embossed glass fragment, two whiteware fragments and one stoneware fragment. The structure at each site appears to have had a corrugated metal roof. At 46WB438 the structure was built with sawn lumber. A local landowner indicated that the areas where the sites are located were used during the first half of the twentieth century as a lumber yard/staging area. We concur that these sites are unlikely to yield significant archaeological deposits and that no further work is necessary.

Site 46WB439 is described as an historic era artifact scatter recovered from secondary deposits within the scattered remains of a modern mobile home, wooden shed and garden. The artifacts consist of a fragment of milk glass and a wire nail. Although cultural features were observed, they are modern in origin. We concur that these deposits are not likely to contribute significant information and that no further work is necessary.

Site 46WB418 was previously identified during an earlier survey effort for this project. At that time, it was characterized as an historic era homestead consisting of a walkway and three historic era artifacts. Also at that time, the site's southern boundary was undefined. We concurred in our November 16, 2015 letter that 46WB118 is not eligible for inclusion in the National Register of Historic Places. The current survey effort resulted in defining the site's southern boundary, the recovery of three additional historic era artifacts, and the documentation of a dry-laid well. Due to the paucity of material remains, we remain in concurrence with the previous determination and concur that no further work is necessary at 46WB418.

Site 46WB440 is identified as a prehistoric lithic scatter located on a terrace. The site produced the proximal end of a projectile point/knife in addition to flakes associated with bifacially worked tools. In addition, an historic isolate was also recovered. Artifact patterning across the site suggests two activity loci may be present. The presence of tools and the potential for deeply buried deposits indicates a potential for intact cultural features and significant information. As a result, we concur that 46WB440 should undergo a Phase II National Register evaluation that includes a geomorphological study and mechanical stripping of the plowzone to look for features. We request that a more specific Phase II scope of work be submitted for our review and will provide further comment upon its receipt.

In summary, upon review of the submitted report, we concur with the recommendations made. We concur that sites 46WB418, 46WB437, 46WB438 and 46WB439 and isolated finds 46BX130 and 46WB436 are not eligible for inclusion in the National Register of Historic Places. No further work is necessary for these resources. We concur that the proposed project will have no effect on 46BX131 provided that it continues to be avoided. Finally,

we concur that 46WB440 should undergo a Phase II National Register evaluation and will provide further comment upon receipt of a Phase II scope of work.

Architectural Resources:

The aforementioned Addendum 1 to Volume II report indicates that two (2) architectural properties are located within the modified direct and indirect APE in Braxton and Webster Counties. They are the Losch Farmstead (field survey # WV-BX-S-3104) and two sections of the Strouds Creek and Muddlety/B&O-Richwood Branch Railroad (field survey # WV-WB-0408). Tetra Tech recommends both are *not eligible* for inclusion in the National Register of Historic Places under any Criteria for Evaluation. We concur with the argument the B&O-Richwood Branch railroad line is *not eligible* for inclusion in the National Register, but we do not concur with their evaluation of the Losch Farmstead. In our opinion, this farmstead retains sufficient integrity to be considered *eligible* for inclusion in the National Register under Criterion A for its association with subsistence farming in the late nineteenth century. It may also be eligible under Criteria C and D, but further information would be necessary to make such determinations.

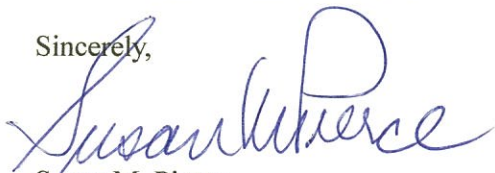
We request you reconsider your recommendation that the Losch Farmstead is *not eligible*. If after reconsidering your determination you agree with our opinion, please assess the effects the proposed undertaking will have to this property. If you do not agree with our assessment, in accordance with 36 CFR 800.4(c)(2) you will need to obtain a formal determination of eligibility from the Secretary of the Interior pursuant to 36 CFR Part 63. We will provide additional comments upon receipt of the requested information and the anticipated addendum reports.

Cemetery Resources:

The survey also resulted in the identification of an unnamed, private family cemetery of three graves (46-BX-129). We concur with Tetra Tech's recommendation that this cemetery is *not eligible* for inclusion in the National Register under Criteria A, B, C, or D, nor does it 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