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EEO/AA Employer

February 12, 2018

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

RE: Mountain Valley Pipeline Project
Cultural Resources Survey, Addendum 7 to Volume IV
Tracts WV-MO-012 and WV-MO-012.001, Monroe County, West Virginia
FERC Docket No. CP 16-10
FR: 15-67-MULTI-60

Dear Mr. Friedman:

We have reviewed the report, "Mountain Valley Pipeline Project, Cultural Resources Survey, Addendum 6 to Volume IV, Tracts WV-MO-012 and WV-MO-012.001, Monroe County, West Virginia" that Tetra Tech prepared 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.

The submitted technical report documents the results of architectural and archaeological surveys within a proposed access road on parcels Tracts WV-MO-012 and WV-MO-012.001 for which survey permission was recently granted. The direct Area of Potential Effect (APE) that was defined for this survey is consistent with the direct APE for the previously considered pipeline corridor and consists of a 100-foot corridor centered on the proposed access road. The indirect APE has been previously reported on in Volume IV and Addendum 1 to Volume IV.

Archaeological Resources:

Archaeological survey within the laydown yard included pedestrian reconnaissance and the excavation of a total of 88 shovel probes. This resulted in the identification of one new archaeological site, 46ME321. The site, which surrounds an extant ca. 1900 barn, is described as multicomponent with 33 artifacts dating to unknown prehistoric period(s) and eight dating to the late nineteenth to early twentieth centuries. The prehistoric artifacts consist of lithic debitage and informal or early stage tool fragments. No diagnostic items were recovered. The historic assemblage is comprised of four plain whiteware body sherds, colorless container glass body fragments and two cut nails. No evidence suggesting the presence of cultural features was encountered. Prior disturbance was evident at the site resulting from use of the current farm road, grading for construction of the barn and excavation for a retaining pond. We concur that the lack of integrity as well as of diagnostic materials and cultural features makes it unlikely that 46ME321 would produce significant information and is not eligible for inclusion in the National Register of Historic Places. We also concur that no further work is necessary for 46ME321 or for this portion of the proposed project.

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Architectural Resources:

We have reviewed the submitted information. Unfortunately, we are unable to concur with the consultant's recommendations for the surveyed barn (ME-0389). We cannot adequately evaluate the potential eligibility of the identified barn without considering its context within and relationship to the Huffman Farmstead. We ask that Tetra Tech submit to our office a revised report and complete HPI form addressing the larger property. We will address the farmstead's eligibility and any potential effects the undertaking may have on it once we receive this requested information.

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,



Susan M. Pierce
Deputy State Historic Preservation Officer

SMP/LLD/MKS

CC: Ms. Evelyn Tidlow, GAI Consultants