



January 8, 2018

The Culture Center
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Randall Reid-Smith, Commissioner

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

RE: Mountain Valley Pipeline Project
Cultural Resources Survey Report: Addendum 6 to Volume IV
Tracts WV-MO-5392, WV-MO-5933, and WV-MO-5934, Monroe County, West Virginia
FR: 15-67-MULTI-54

Dear Mr. Friedman:

We have reviewed the report, "Mountain Valley Pipeline Project, Cultural Resources Survey, Addendum 6 to Volume IV, Tracts WV-MO-5392, WV-MO-5933, and WV-MO-5934, 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 laydown yard designated MVP-LY-037. The Area of Potential Effect (APE) that was defined for this survey is consistent with the APE for the previously considered pipeline corridor and consists of the proposed limits of disturbance for the proposed laydown yard. No additional architectural resources were identified.

Archaeological survey within the laydown yard included pedestrian reconnaissance and the excavation of a total of 82 shovel probes. This resulted in the re-identification of previously documented site 46ME201 and in the discovery of one new archaeological site, 46ME320. Site 46ME201, a prehistoric lithic scatter with Early to Middle Archaic components, was initially discovered during a survey conducted in 1997. Subsequent to a Phase II investigation in 1999, the site was determined not eligible for inclusion in the National Register of Historic Places due to a lack of intact archaeological deposits and features. Shovel probes excavated within the site's boundary during the current survey resulted in the recovery of 133 additional prehistoric artifacts and in the expansion of the site's boundaries to the north. However, the data recovered do not provide any new information that would alter the site's eligibility. As such, we concur that no further work is necessary for 46ME201.

Site 46ME320 is described as a diffuse, low density prehistoric lithic scatter of unknown age. Twelve fragments of modern amber container glass also were recovered, but likely represent casual discard rather than the remains of an historic era occupation. The prehistoric assemblage includes tertiary flakes, flake fragments, secondary flakes, shatter, one utilized flake and one groundstone tool. No diagnostic materials were recovered. The site's close proximity to Middle Archaic Period site 46ME232 and other

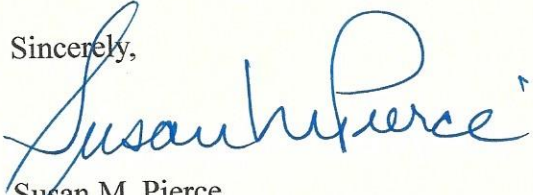
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sites with Archaic Period components suggests the possibility that 46ME320 is part of a larger pattern of Archaic land use and may contribute significant information regarding settlement patterns in this area. We concur with the recommendation that 46ME320 be avoided or undergo Phase II National Register evaluation.

It is our understanding that Mountain Valley Pipeline has decreased the size of the laydown yard to avoid impacting 46ME320. In addition, protective fencing will be placed along the LOD closest to the site's boundary and sensitive area signs will be posted. Provided that the site is avoided and these measures implemented, we concur that the proposed project will have no effect on 46ME320 and that no further work is necessary. Please contact our office if there are any project changes.

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 blue ink that reads "Susan M. Pierce". The signature is written in a cursive style with a large, looped initial "S".

Susan M. Pierce
Deputy State Historic Preservation Officer

SMP/LLD