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EEO/AA Employer

March 31, 2017

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

RE: Mountain Valley Pipeline Project
Phase II Archaeological Investigations – Nicholas and Greenbrier Counties, WV
FR# 15-67-MULTI-37

Dear Ms. Landfried Neylon:

We have reviewed the technical report documenting Phase II archaeological investigations conducted on sites in Nicholas and Greenbrier Counties, WV. 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 Phase II report documents National Register evaluations that were conducted on sites 46NI846, 46NI847, 46GB493, 46GB498, 46GB499, 46GB500, 46GB503, 46GB504, 46GB505, 46GB533 and 46NI827. In general, field work consisted of the excavation of close interval shovel probes and 1x1 meter test units. In addition, flotation and radiocarbon samples were collected when appropriate, and lithic artifacts and archaeobotanical remains were analyzed. At sites 46GB504 and 46GB505, controlled surface collection was conducted in lieu of close interval shovel probe excavation, and the plowzone was mechanically removed from a series of 10 by 10 meter blocks to expose the presence of any intact cultural features. In addition, exploratory trenches were excavated at 46GB504 and 46GB505 to assess the potential for deeply buried archaeological deposits.

Sites 46GB493 and 46GB500 are described as low density prehistoric lithic scatters. Diagnostic artifacts recovered from plowzone deposits at 46GB500 indicate the area was used during the Late Archaic and Late Woodland periods. Site 46GB493 is of unknown age. While Phase II investigations increased the sample of lithic artifacts from each site, the lack of botanical and faunal data, cultural features, and stratified deposits, suggests the sites do not possess research potential. As a result, we concur that 46GB493 and 46GB500 are not eligible for listing in the National Register of Historic Places.

Sites 46GB499 and 46GB503 are multi-component sites consisting of small prehistoric lithic scatters intermixed with the remains of early 20th century farmsteads. The prehistoric component at 46GB499 produced projectile points dating to the Late Archaic, Early and Late Woodland periods, while a single Middle to Late Archaic period projectile point was recovered from 46GB503. However, in addition to the mixed nature of the deposits, the prehistoric components of these sites lack associated cultural features, stratified deposits, and subsistence data, indicating that they do not have the potential to provide significant information regarding the area's prehistory. Deed research indicates that the parcels encompassing 46GB499 and 46GB503 were part of an 1818

land grant. However, the land changed ownership a number of times and cartographic evidence does not indicate the presence of structures at the sites' locations until the early 20th century. Phase II investigations of these sites resulted in the recovery of sizable artifact assemblages and in the identification of a number of historic period features, including a stone path and a stone lined well still containing water. The artifacts, which include a variety of whiteware, plain ironstone, container glass, window glass, brick fragments, wire and cut nails, and a small number of personal items, broadly support an early 20th century occupation but are dominated by materials that are non-diagnostic or have broad manufacturing date ranges. As well, with the exception of the stone well, exploration of the features determined they were either natural soil anomalies or resulted from the demolition and grading of the former structures. As a result, we concur that 46GB499 and 46GB503 are unlikely to provide significant information regarding the history of the area. Therefore, we concur that they are not eligible for inclusion in the National Register of Historic Places.

Sites 46GB533 and 46NI827 are multi-component prehistoric lithic scatters intermixed with negligible scatters of historic period artifacts. It is our understanding that both of these sites extend beyond the proposed limits of disturbance (LOD) as currently designed. Phase II investigations resulted in the recovery of additional lithic artifacts, including Middle and Late Archaic and Middle to Late Woodland projectile points from 46GB533, one Archaic Period projectile point from 46NI827, non-diagnostic tools, and a variety of debitage. In addition, one possible post mold was identified at 46NI827, while no definitive prehistoric features were discovered at 46GB533. Given the low density of prehistoric materials recovered from intact contexts and the lack of cultural features and subsistence remains, we concur that the portions of 46GB533 and 46NI827 that are located within the LOD do not contain significant information or contribute to the overall eligibility of their respective sites. The unevaluated portions of 46GB533 and 46NI827 will be avoided by the proposed project through the use of protective fencing, which will be placed along the edge of the LOD closest to the unevaluated portions of each site.

Sites 46NI846 is a multi-component prehistoric site dating to the Archaic and Woodland periods. Phase II investigations resulted in the recovery of seven diagnostic projectile points, other lithic tools, including one hammerstone, fire cracked rock (FCR) and a variety of debitage. In addition, five soil anomalies and two possible post molds were identified. While two of the soil anomalies appear to be non-cultural, others seem to be the disturbed remains of a thermal feature. Feature 4 appears to be the intact remains of a basin shaped hearth or other thermal feature that produced artifacts, FCR and charcoal. Because the site retains intact archaeological deposits in non-plowzone contexts, we concur it has the potential to provide significant data and is eligible for listing in the National Register of Historic Places. It is our understanding that 46NI846 will be avoided by the proposed project via a shift in the proposed center line to the northwest of the site. Protective fencing will be placed along the edge of the LOD closest to the site.

Site 46NI847 is described as a seasonal, temporary camp that was repeatedly occupied during the Late Archaic period for processing mast and other plant resources. Phase II investigations resulted in the recovery of ten diagnostic projectile points, a variety of other lithic tools, FCR and debitage. Five features were also identified, three of which produced charcoal and carbonized plant remains, including hickory and black walnut nutshells. Radiocarbon samples taken from two of the features indicated repeated occupation during the Late Archaic Period. However, three of the eight samples from Feature 4 also suggest brief use of the area during the Early Woodland and Late Prehistoric periods. The recovery of Early Archaic projectile points suggests site use during this period as well. Analysis of the lithic assemblage demonstrates that site occupants also focused on the maintenance of hafted stone tools. Because the site is capable of providing significant information regarding site

selection as well as subsistence and resource procurement strategies, we concur it is eligible for listing in the National Register of Historic Places. It is our understanding that the site will be avoided by a shift in the pipeline corridor to the south of the site. In addition, protective fencing will be placed on the edge of the LOD nearest to the site's boundary.

Site 46GB498 is identified as a multi-component prehistoric site with the primary occupation dating to the Late Woodland period. Other prehistoric periods represented at the site by the presence of projectile points include Early, Middle and Late Archaic and Early Woodland. The site is described as a hamlet that was likely occupied during the Late Woodland period by a single family tending a crop of corn or procuring other seasonally available plant and/or animal resources. Phase II investigations resulted in the recovery of Radford ware ceramics, 23 diagnostic projectile points, including 13 Madison points, a variety of other flaked and ground stone tools, FCR, calcined bone fragments and debitage. Five cultural features, including post molds suggesting the presence of a domestic structure, were identified. Additional scattered post molds were also observed in several test units. Paleobotanical remains recovered from feature contexts include *Zea mays* (corn), hardwood nut species and *Chenopodium* seeds. Radford ceramics were also recovered from feature contexts in association with Madison points. We concur that 46GB498 is eligible for inclusion in the National Register of Historic Places.

It is our understanding that the pipeline could not be redesigned to avoid 46GB498. Therefore, impacts will be minimized via the use of conventional boring of the pipeline under the eastern portion of the site where the household cluster was identified. Entrance and exit bore pits will be located 15 feet away from the site on its northern and southern boundary. In addition, timber matting will be placed on the western portion of the site, where no cultural features or prehistoric ceramic artifacts were recovered, to facilitate the movement of vehicles during pipeline construction. Because the use of timber matting has had mixed success, we will concur with the proposed minimization plan provided that an archaeologist is present during the placement and removal of the timber mats to ensure that archaeological deposits are not inadvertently disturbed.

Sites 46GB504 and 46GB505 are multi-component prehistoric lithic scatters located in close proximity to each other on a colluvial fan adjacent to the floodplain of Buffalo Creek. Site 46GB504 contains components dating to the Early, Middle and Late Archaic and the Late Woodland periods, while 46GB505 was occupied during the Early and Middle Archaic and Late Woodland periods. Data suggest that 46GB505 is an extension of 46GB504. Phase II investigation of these resources resulted in the identification of three small pit-hearths at each site and in the recovery of additional lithic artifacts, including flake scrapers and diagnostic projectile points. The presence of carbonized blackberry nuts, thumbnail scrapers and lamellar blades, suggests the area was used for more than expedient tool maintenance or other activities associated with short-term outings. However, with the exception of Feature 3 at 46GB504, which produced an Early Archaic projectile point, all the diagnostic tools were recovered from plowzone or surface contexts. The lack of stratified deposits makes it difficult to define chronologically discrete components at each site. Because the sites have provided significant information about the Early Archaic period, we concur that 46GB504 and 46GB505 are eligible for inclusion in the National Register of Historic Place. It is our understanding that 46GB504 and 46GB505 will be avoided by the proposed project via elimination of a temporary workspace and redesign of the proposed pipeline corridor.

In conclusion, we concur that sites 46GB493, 46GB500, 46GB499 and 46GB503 are not eligible for inclusion in the National Register of Historic Places. We also concur that the portions of sites 46GB533 and 46NI827 located within the LOD, as currently defined, do not contain significant information or contribute to the overall

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eligibility of their respective sites. No further work is necessary for these sites. We concur that sites 46NI846, 46NI847, 46GB498, 46GB504 and 46GB505 are eligible for listing in the National Register of Historic Places. Provided that these sites are avoided by the proposed project as described in the proposed avoidance plans and with the addition of archaeological monitoring of the placement and removal of timber matting at 46GB498, we concur that the proposed project will have no adverse effect on these resources.

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, 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, looping initial "S".

Susan M. Pierce
Deputy State Historic Preservation Officer

SMP/LLD