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EEO/AA Employer

March 8, 2018

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

RE: Mountain Valley Pipeline Project
Proposed MVP-LY-051 Laydown Yard, Harrison County, WV
FERC Docket No. CP 16-10
FR: 15-67-MULTI-63

Dear Mr. Friedman:

We have reviewed the additional information that was submitted 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 information states that Mountain Valley Pipeline (MVP) identified the need for an additional laydown yard (MVP-LY-051) in Harrison County, WV. The proposed yard is located on the west side of WV Route 2, approximately 1.2 miles north of the intersection of WV Route 24 and Interstate 79 and covers 36.4 acres. The direct Area of Potential Effect (APE) for the current investigation is defined as the footprint of the proposed expansion area.

Archaeological Resources:

Archaeological survey of the APE included the systematic excavation of 175 shovel probes. Disturbed soils, likely associated with extensive preparation for the construction of a residential subdivision or commercial shopping center, were encountered over the entire project area. The disturbed soils consist of introduced fill that has capped natural soils below. No cultural materials were identified. It is our understanding that any impacts resulting from the parcel's use as a laydown yard will be confined to the previously disturbed soils. As a result, we concur that use of the parcel as a laydown yard will have no effect on archaeological historic properties and that no further archaeological investigations are necessary.

Architectural Resources:

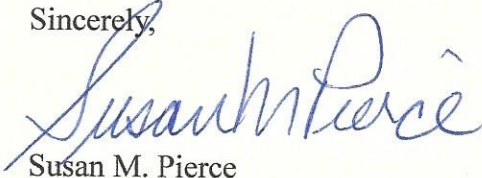
We have reviewed the submitted information and are unable to evaluate the eligibility of the two (2) extant transmission towers located within the laydown yard's direct APE. Additional research would be necessary to make such a determination. Though, it is highly unlikely the two towers would be deemed individually eligible. If they were listed in the National Register of Historic Places, it would probably be as contributing elements within a linear resource such as the complete transmission line. The submitted documentation indicated the "tower configuration will not be impacted" by MVP's use of the yard. Since the proposed work will have no direct effect on the towers and will impose only temporary visual

March 8, 2018
Mr. P. Friedman
FR: 15-67-MULTI-63
Page 2

changes on the towers' setting (the submission noted tree clearance or additional above-ground construction will not be necessary within the laydown yard's limits), it is our opinion the proposed yard will have *no effect* on historic architectural or other above-ground resources. No further consultation is necessary regarding architectural resources within or around the additional laydown yard LY-051; however, we ask that you contact our office if your project should change.

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/MKS

CC: Ms. Evelyn Tidlow, GAI Consultants