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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-037 Laydown Yard, Monroe County, WV
FERC Docket No. CP 16-10
FR: 15-67-MULTI-69

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 a need to expand laydown yard MVP-LY-037 by approximately 8.78 acres to the southwest of the area that was initially surveyed. The proposed yard and expansion are located along Route 219 northeast of Peterstown, Monroe County, WV. The initial survey results for laydown yard MVP-LY-037 were reported in *Mountain Valley Pipeline Project Cultural Resource Survey Addendum 6 to Volume IV, Tracts WV-MO-5392, WV-MO-5933 and WV-MO-5934, Monroe County, West Virginia* and commented on by this office in a letter dated January 8, 2018. The direct Area of Potential Effect (APE) for the current investigation is defined as the footprint of the proposed expansion area. This area is currently used as a golf driving range.

Archaeological Resources:

Archaeological survey of the APE included the excavation of 72 shovel probes at 5-, 15-, and 30-meter intervals. As indicated in the submitted materials, the mapped boundaries of site 46ME201 extend into the proposed expansion area. A total of 11 non-diagnostic artifacts, including tertiary flakes, flake fragments, and one end scraper, associated with site 46ME201 were recovered from within the previously defined boundary. We concur that the additional data do not provide significant information and that the site is not eligible for inclusion in the National Register of Historic Places. Other portions of the APE exhibited disturbed soils consisting of a fill layer overlying a clay lens that capped intact subsoil. The disturbed soils are likely associated with earthmoving activities that occurred prior to the area's use as a golf driving range. 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.

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Architectural Resources:

As the submission indicated, no extant historic above-ground resources are located within the proposed expansion area. Available historic aerial imagery indicates nearby properties do not meet the fifty-year threshold for consideration of inclusion in the National Register of Historic Places. We remain in concurrence, therefore, that the proposed laydown yard expansion will have *no effect* on historic architectural resources. No further consultation is necessary regarding architectural resources within or around the proposed expansion area; 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 initial "S".

Susan M. Pierce
Deputy State Historic Preservation Officer

SMP/LLD/MKS

CC: Ms. Evelyn Tidlow, GAI Consultants