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EEO/AA Employer

May 21, 2018

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

RE: Mountain Valley Pipeline Project
Combined County Report 3
Wetzel, Braxton, and Webster Counties, West Virginia
FR: 15-67-MULTI-96

Dear Mr. Friedman:

We have reviewed the technical report titled *Mountain Valley Pipeline Project Cultural Resources Survey Combined County Report 3 Wetzel, Braxton, and Webster Counties, West Virginia*. 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 conducted within newly proposed project components in West Virginia. These are as follows: in Wetzel County - two access roads (MVP-WE-014.03 and MVP-WE-014.04) and one laydown yard (MVP-LY-069); in Braxton County - one laydown yard (MVP-LY-070); and in Webster County - a network of five interconnecting access roads (WV-WB-129.01 – 129.05) with two associated additional temporary workspace (ATWS) (MVP-ATWS-1551 and MVP-ATWS-1552), one ATWS (MVP-ATWS-1550), and one access road (MVP-WB-133.01) with an associated ATWS (MVP-ATWS-1555). The direct and indirect Areas of Potential Effect (APE) defined for this survey are consistent with those for the previously considered pipeline project.

Archaeological Resources:

Archaeological survey of the abovementioned parcels included pedestrian reconnaissance over the entire APE and the excavation of a total of 32 shovel test pits. Steep terrain or extensive prior disturbance were observed over most of the currently proposed APE. One prehistoric isolated find, 46WB441, was identified within the corridor proposed for access road MVP-WB-133.01. The isolated find, which was recovered from the upper 10 centimeters of shallow A-Horizon soils, consists of a single late-stage reduction flake composed of an unknown material. Additional shovel probes were negative for cultural materials. We concur that this resource is not eligible for inclusion in the National Register of Historic Place. No archaeological sites were discovered within the rest of the APE. As a result, we concur that no further work is necessary for this portion of the proposed project and that development of these project elements will have no effect on archaeological historic properties.

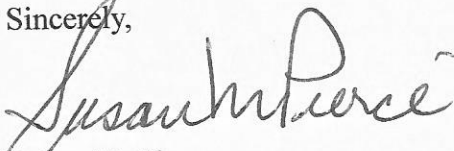
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Architectural Resources:

We have reviewed the submitted report and concur with the consultant's recommendations that the proposed temporary access roads and laydown yards will have no effect on historic architectural resources. Most of the described project elements will not require demolition, new construction, or major tree clearance to make space for the use of the roads and yards. In the few instances where tree removal will be necessary, no new or undocumented historic architectural resources were identified by survey staff. Therefore, the proposed work will have no effect on historic architectural resources. No further consultation is necessary regarding architectural resources; 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,



Susan M. Pierce
Deputy State Historic Preservation Officer

SMP/LLD/MKS

CC: Ms. Evelyn Tidlow, GAI Consultants