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May 22, 2018

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

RE: Mountain Valley Pipeline Project
REVISED Cultural Resources Survey, Addendum 7 to Volume IV, May 2018
Tracts WV-MO-012 and WV-MO-012.001, Monroe County, West Virginia
FERC Docket No. CP 16-10
FR: 15-67-MULTI-97

Dear Mr. Friedman:

We have reviewed the *revised* report, "Mountain Valley Pipeline Project, Cultural Resources Survey, Addendum 7 to Volume IV, Tracts WV-MO-012 and WV-MO-012.001, Monroe County, West Virginia" dated May 2018 that Tetra Tech prepared for the aforementioned 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 access road on parcels Tracts WV-MO-012 and WV-MO-012.001 for which survey permission was recently granted. The direct Area of Potential Effect (APE) that was defined for this survey is consistent with the direct APE for the previously considered pipeline corridor and consists of a 100-foot corridor centered on the proposed access road. The indirect APE has been previously reported on in Volume IV and Addendum 1 to Volume IV.

Archaeological Resources:

Our office addressed archaeological resources documented in the above-listed report in a letter dated February 12, 2018 (FR:15-67-MULTI-60).

Architectural Resources:

We have reviewed the revised report and concur with the consultant's recommendations. We concur the Huffman Farmstead (ME-0389) is *eligible* for inclusion in the National Register of Historic Places under Criterion A as a representative example of agricultural developments in Monroe County. However, we do not concur the home and outbuildings are eligible under Criterion C. The submitted report argued their eligibility "as a well-preserved collection of early-twentieth century domestic and agricultural buildings and structures." We agree with this finding, but opine this qualifies the property for listing under Criterion A, not Criterion C.

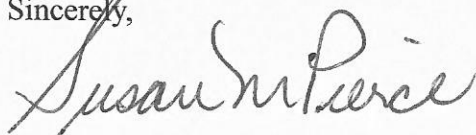
After consultation between our office, Tetra Tech, and the farmstead property owner, we concur the

May 22, 2018
Mr. P. Friedman
FR: 15-67-MULTI-97
Page 2

proposed access road use may impose an adverse effect on the barn, but sufficient good faith efforts have been made to minimize and avoid those effects. Vibrations caused by passing trucks and project equipment for the pipeline construction may cause the barn to collapse. While understanding this potential, the owner selected to forego stabilizing the structure. However, the owner allowed Mountain Valley to install jersey barriers and stabilize the road way to help avoid any other direct effects on the property or the barn. Thus, it is our opinion that the proposed avoidance plans represent a good faith effort on Mountain Valley's part to avoid foreseeable effects on the barn and farmstead property. Due to the owner's decision to forego any stabilization of the barn, we concur the proposed use of the Huffman Farmstead requires no further consultation at this time. We ask that you contact our office if the project should change. As described in the report, Mountain Valley should provide our office with updates if any effects occur on the Huffman Farmstead.

We appreciate the opportunity to be of service. *If you have questions regarding our comments or the Section 106 process, please contact 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