

**The Culture Center**  
1900 Kanawha Blvd., E.  
Charleston, WV 25305-0300

**Randall Reid-Smith, Commissioner**

Phone 304.558.0220 • www.wvculture.org  
Fax 304.558.2779 • TDD 304.558.3562  
EEO/AA Employer

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

RE: Mountain Valley Pipeline Project  
Phase II Archaeological Investigations and Treatment Plan, Addendum 10 to Volume IV  
Sites 46SU752, 46SU754, 46SU755, 46SU756 and 46SU757  
Summers County, West Virginia  
FR: 15-67-MULTI-73

Dear Mr. Friedman:

We have reviewed the technical report titled *Mountain Valley Pipeline Project Addendum 10 to Volume IV Phase II Archaeological Investigations and Treatment Plan Sites 46SU752, 46SU754, 46SU755, 46SU756 and 46SU757 Tracts WV-SU-008 and WV-SU-009 Summers County 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.

Phase II investigations of sites 46SU752, 46SU754, 46SU755, 46SU756 and 46SU757, which are clustered along the ridgeline of Red Spring Mountain in a nearly uninterrupted grouping, included the excavation of close interval shovel probes and/or test units. A variety of additional lithic materials were recovered, including large numbers of biface thinning and curation flakes, formal and informal tools as well as temporally diagnostic artifacts. Cultural features or possible features were identified at 46SU754, 46SU756 and 46SU757. Artifact clusters were also documented at sites 46SU755, 46SU756 and 46SU757. At the end of the Phase II investigations, site 46SU755 is described as the remains from a series of encampments throughout the Archaic period, while 46SU756 represents a series of encampments from the Early and Middle Archaic periods. Site 46SU757 consists of a multicomponent site, the main occupation of which dates to the Late Woodland period based on the recovery of 14 triangular projectile points and 19 fragments of ceramics identified as Radford ware from feature contexts.

In general, evidence recovered during the Phase I and Phase II investigations suggests that this ridgeline may have been integral to short-term resource procurement and group mobility throughout prehistory. As a result, we concur that sites 46SU755, 46SU756 and 46SU757 are eligible for inclusion in the National Register of Historic Places. It is our understanding that Phase II investigations were not

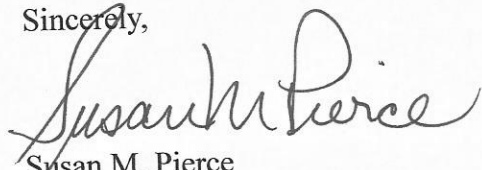
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completed at sites due to issues with the construction schedule. These two sites are understood to be low density lithic scatters of unknown age. However, comparative data from the other sites suggest they functioned in a similar way and could contribute significant information to the overall understanding of prehistoric occupations along this ridgeline. Consequently, Mountain Valley Pipeline has agreed to treat 46SU752 and 46SU754 as eligible for listing in the National Register. We have no objection to this decision.

It is our understanding that sites 46SU752, 46SU754, 46SU755, 46SU756 and 46SU757 cannot be avoided by the proposed project. Therefore, we have also reviewed the proposed treatment plan, which recommends data recovery excavations to mitigate the adverse effects resulting from construction of the pipeline. The treatment plan proposes to address research questions regarding chronology, archaeological context, and function of the sites, settlement patterns, subsistence, seasonality, organization of space, and mobility patterns as represented by lithic raw material. Field methods proposed include plowing and controlled surface collection, block excavation, and mechanical stripping of the Ap soil horizon to aid in feature identification. Up to 100 features will be excavated across the five sites. If numerous postmolds are encountered, they will be sampled. Soil samples will be collected from feature and non-feature contexts for flotation. In addition, if wood charcoal or other datable organic material is present, samples will be taken for radiocarbon dating. Up to 50 radiocarbon samples will be submitted for dating. Artifacts and any botanical and faunal remains will be processed and analyzed for use in site interpretation. Finally, a technical report will be prepared that provides the detailed results of the excavations. All work will be conducted in accordance with federal and state standards and guidelines. We concur with the proposed treatment plan and look forward to reviewing the results of data recovery excavations.

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,



Susan M. Pierce  
Deputy State Historic Preservation Officer

SMP/LLD

CC: Ms. Evelyn Tidlow, GAI Consultants