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EEO/AA Employer

July 31, 2018

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

RE: Mountain Valley Pipeline Project
FERC Docket No. CP 16-10
Proposed Temporary Workspace MVP-ATWS-1543
FR: 15-67-MULTI-112

Dear Mr. Friedman:

We have reviewed the technical report titled Mountain Valley Pipeline Project Cultural Resource Survey, Addendum 4 to Volume III, Site 46NI859 Phase I and Phase II Results and Site 46NI859 Treatment Plan, Nicholas County, WV, which 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) is proposing one new variance consisting of a temporary workspace (ATWS) (MVP-ATWS-1543) that will be located northwest of the community of Nettie, near pipeline Milepost 122.3, in Nicholas County, WV. The ATWS is located within an area that was previously surveyed for indirect effects to cultural resources. No historic properties were identified during the earlier survey. No tree clearing will be required as part of this project facility.

Archaeological Resources:

According to the report, Phase I archaeological survey of the proposed ATWS included pedestrian reconnaissance and shovel probe excavation. One new archaeological site, 46NI859, was discovered. At the conclusion of the Phase I field work, the site consisted of a prehistoric lithic scatter with at least one occupation dating to the Early Archaic Period. Because tools and diagnostic materials were recovered, Phase II investigations were completed to determine the site's eligibility to be included in the National Register of Historic Places.

Phase II investigations included the excavation of close interval shovel probes, which resulted in the recovery of 2,225 prehistoric artifacts and in the identification of one cultural feature and three artifact concentrations. A minor, insignificant historic-era artifact scatter was also identified. In addition to lithic debitage, the prehistoric assemblage includes more than 40 projectile points and point fragments that predominantly date to the Early Archaic Period (although middle and late Archaic and early Woodland specimens were also recovered), formal and informal tools, one groundstone, seven hammerstones, and several fragments of fire-cracked rock. The site is thought to represent either an intensively occupied base-camp with spatially separate work areas or a special-use camp that was reoccupied for brief episodes over a long period of time. Although most of the artifacts were recovered from plowzone deposits, the site retains

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horizontal spatial patterning and intact cultural features. Sufficient data is present within the site to address research questions focusing on chronology, subsistence and settlement patterns, and lithic technology. Consequently, we concur that 46NI859 is eligible for inclusion in the National Register of Historic Places. We also concur that the historic component is non-contributing to the site's eligibility.

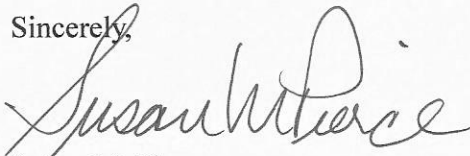
It is our understanding that MVP may not be able to avoid the site. In that event, a data recovery treatment plan has been proposed to mitigate the resulting adverse effect. The treatment plan proposes to focus data recovery excavations on the three loci identified during the Phase II via a series of 5-x-5-meter blocks. A smaller number of 5-x-5-meter blocks will also be excavated in the areas outside of the loci. Any identified cultural features will be documented and excavated, with the exception of postmolds, which will be sampled if their numbers are too great. Soil samples will be retained from each feature and processed for flotation. Lithic artifacts are expected to comprise the primary artifact class and will be analyzed following methods used during the Phase II investigations. In addition, radiocarbon dating will be conducted on up to three samples recovered from each feature, while spatial statistical analysis will be performed to help interpret cultural behavior at the site. The recovered data will be used to address questions pertaining to site formation and stratigraphy, site use and structure, flaked stone technological organization, prehistoric mobility patterns and site chronology. Finally, the results of the excavations will be presented at two annual archaeological conferences and published in one article in a regional journal. We concur with the data recovery treatment plan. Per Stipulation IV.E of the Programmatic Agreement for this project, we expect to receive a management summary within 30 days of the completion of field work and/or measures outlined in the treatment plan and look forward to reviewing the results.

Architectural Resources:

We have reviewed the submitted information and determined no further consultation is necessary regarding the aforementioned project element. The project area will require no tree clearance. No new or additional historic architectural resources were documented within the project element's direct or indirect APEs. Therefore, it is our opinion the proposed temporary access road 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 the 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