



# COMMONWEALTH of VIRGINIA

Molly Joseph Ward  
Secretary of Natural Resources

**Department of Historic Resources**  
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Julie V. Langan  
Director

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August 18, 2017

Ms. Megan L. Neylon  
Mountain Valley Pipeline  
625 Liberty Avenue, Suite 1700  
Pittsburgh, PA 15222

Re: *Mountain Valley Pipeline Project, Phase II Archaeological Evaluations of 18 Sites, Franklin County, Virginia* (February 2017)  
DHR File No. 2014-1194; FERC #CP16-10

Dear Ms. Neylon:

We have received for review the report referenced above prepared by Tetra Tech. We provide the following comments as assistance to the Federal Energy Regulatory Commission in meeting its responsibilities under Section 106 of the National Historic Preservation Act.

The consultant recommends two (2) sites – 44FR0372 and 44FR0392 – eligible for listing in the National Register of Historic Places (NRHP) and the remaining 16 sites as not NRHP-eligible. Generally, we concur with these recommendations (see attached table); however, a letter from Preservation Virginia dated June 29, 2017 raises several concerns regarding numerous sites in Franklin County that should be addressed. Specifically, we would be interested in better understanding how the potential for deeply buried cultural deposits along Blackwater River has been assessed in the new right-of-way established to avoid site 44FR0372. The shovel test data for that section do not appear to reflect the augering proposed to investigate such depositional areas. We accept the proposed avoidance plans for the six (6) sites included in Appendix G.

If you have any questions regarding these comments or our review of this project, please do not hesitate to contact me at [roger.kirchen@dhr.virginia.gov](mailto:roger.kirchen@dhr.virginia.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Roger W. Kirchen".

Roger W. Kirchen, Director  
Review and Compliance Division

- c. Ms. Sydne Marshall, Tetra Tech  
Ms. Sonja Ingram, Preservation Virginia

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<b>Site No.</b>	<b>Tetra Tech Recommendation</b>	<b>DHR Recommendation</b>	<b>Comments</b>
44FR0191	Not Eligible	Not Eligible	
44FR0360	Not Eligible	Potentially Eligible	Insufficiently tested, but no contributing deposits within LOD. No further work.
44FR0363	Not Eligible	Not Eligible	
44FR0365	Not Eligible	Not Eligible	
44FR0366	Not Eligible	Not Eligible	
44FR0372	Eligible	Eligible	Address PVa comments
44FR0373	Not Eligible	Not Eligible	
44FR0376	Not Eligible	Not Eligible	
44FR0391	Not Eligible	Not Eligible	
44FR0392	Eligible	Eligible	Address PVa comments
44FR0393	Not Eligible	Not Eligible	
44FR0394	Not Eligible	Not Eligible	
44FR0396	Not Eligible	Not Eligible	
44FR0397	Not Eligible	Not Eligible	
44FR0401	Not Eligible	Not Eligible	
44FR0404	Not Eligible	Not Eligible	
44FR0406	Not Eligible	Not Eligible	
44FR0410	Not Eligible	Not Eligible	