WEST VIRGINIA
Division of Culture and History

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August 15, 2017

Ms. Megan Landfried Neylon
Senior Environmental Coordinator
Mountain Valley Pipeline, LLC.
625 Liberty Avenue, Suite 1700
Pittsburgh, Pennsylvania 15222

RE: Mountain Valley Pipeline Project
Phase II Archaeological Investigations – 46ME311
Contingency Treatment Plans – 46ME311 and 46GB498
FR# 15-67-MULTI-40

Dear Ms. Landfried Neylon:

We have reviewed the technical report documenting Phase II archaeological investigations conducted on site 46ME311 in Monroe County, WV and the contingency treatment plans for sites 46ME311 and 46GB498. 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 site 46ME311 included the excavation of 372 close interval shovel probes and 20 test units, eight of which were excavated as 2x2 meter blocks. This resulted in the recovery of 693 lithic flakes and flake fragments, 15 temporally diagnostic projectile points, 12 of which date to the Early Archaic Period, and a variety of non-diagnostic lithic tools and cores, including biface fragments, flake scrapers, and utilized flakes. The remaining projectile points date to the Late Archaic through Early Woodland Periods. In addition, eight cultural features consisting of five pit-hearths and three postmolds were identified. The locations of the postmolds suggests that they held a rack or other support related to the pit-hearths. Radiocarbon samples taken from feature contexts suggest that 46ME311 was also occupied during the Middle and Late Woodland Periods, however, no diagnostic artifacts were recovered to support this. Five concentrations of flaking debris were identified, suggesting the area was used as short-term camps during hunting and/or collecting incursions into upland settings from larger base camps. Analysis of carbonized plant remains, also recovered from feature contexts, supports this interpretation. We concur that 46ME311 has the potential to address a variety of significant research questions and is eligible for inclusion in the National Register of Historic Places.

The avoidance plan for 46ME311 is similar to that for 46GB498, which we concurred was eligible for listing in the National Register of Historic Places in our March 31, 2017 letter. In order to avoid adverse effects to 46ME311, conventional boring will be used to install the pipeline a minimum of eight feet below the ground surface and well beneath the maximum depth of the site. Both bore pits will be located outside of the site area. In addition, timber matting and construction fencing will be used to ensure the site area is not disturbed during construction. We concur with the recommendation that an archaeological monitor be present during clearing, trenching, and boring operations to ensure that significant archaeological deposits are not impacted during construction. Provided that the avoidance plan is followed, we concur that the proposed pipeline will have no adverse effect to 46ME311.

If the proposed bore drilling fails below 46ME311 and for 46GB498, pipeline construction would constitute an adverse effect on these sites. Consequently, contingency treatment plans, consisting of proposals for data recovery excavations, have been prepared to mitigate the adverse effects. The data recovery plans propose test unit excavation and mechanical stripping of the plowzone in varying amounts at each site, and excavation of all identified features. In addition, flotation and constant volume core samples will be taken from feature and non-feature contexts, respectively, and processed to recover additional data. Laboratory analyses will examine lithic artifacts as well as any ceramic, faunal and floral samples recovered. It is anticipated that 25 radiocarbon samples will be processed from each site. The data recovered from each site will be used to address a variety of research questions such as the structure of an upland horticultural hamlets and the broader cultural relations of Radford ceramics at 46GB498, and settlement and mobility patterns, the organization of space, and site selection by ecotone diversity at 46ME311. In order to expedite the review process and allow for construction to proceed as soon as possible, management summaries will be submitted for our review within ten days of the completion of field work. Our concurrence with the findings presented in the management summaries will serve as notification to FERC that the archaeological fieldwork has been successfully completed. The complete results of the data recovery excavation will be presented in a full technical report that will be submitted for our review after all analyses are complete. Finally, the contingency plans include plans for public outreach such as the creation of pamphlets for public distribution and presentations at professional meetings. We concur with the contingency plans as presented.

Finally, because bore failure below sites 46ME311 and 46GB498 would constitute and adverse effect, the Advisory Council on Historic Preservation (ACHP) would need to be invited to participate in consultation. Notifying the ACHP of the potential for an adverse effect now, before an adverse effect has occurred, would help to expedite the review process. We suggest you include a stipulation regarding the potential adverse effect within the Programmatic Agreement that we discussed with you in our August 9, 2017 conference call and attach the contingency treatment plans as appendices to the document.

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