

**Mountain Valley Pipeline Project**

**Docket No. CP16-10-000**

**Attachment DR6 Question 13b**



# COMMONWEALTH of VIRGINIA

Molly Joseph Ward  
Secretary of Natural Resources

**Department of Historic Resources**  
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December 31, 2015

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

Re: *Mountain Valley Pipeline Project Phase IB Archaeological Survey Report, Giles County, Virginia*  
DHR File No. 2014-1194; FERC #PF15-3-000

Dear Ms. Neylon:

The Department of Historic Resources (DHR) has received for review the report referenced above prepared by Tetra Tech for Mountain Valley Pipeline, LLC. It is our opinion that this report meets DHR's *Survey Guidelines* and other applicable standards. We provide the following comments as assistance to Mountain Valley Pipeline, LLC and the Federal Energy Regulatory Commission in meeting their collective responsibilities under Section 106 of the National Historic Preservation Act.

The Phase IB archaeological survey covered approximately 1,745 acres of project area in Giles County, VA. Approximately 123 acres within the Jefferson National Forest will be surveyed independently by the U.S. Forest Service. An additional 149 acres were not accessible during this survey. The remaining archaeological survey will be completed and presented as addenda to this report

The survey identified 12 archaeological sites and 41 isolated finds. Isolated finds are, by definition, not eligible for listing in the National Register of Historic Places and no further consideration of these resources is warranted. The consultant recommends and DHR concurs that the following nine (9) sites are *potentially eligible* for listing in the National Register of Historic Places (NRHP): **44GS0226, 44GS0227** (prehistoric component), **44GS0229, 44GS0230, 44GS0231, 44GS0232, 44GS0235, 44GS0236, and 44GS0237**. Further, the consultant recommends and DHR concurs that the following three (3) sites are *not eligible* for NRHP listing: **44GS0228, 44GS0233, and 44GS0234**.

The nine (9) potentially eligible sites should be avoided or subjected to Phase II archaeological evaluation. It is our understanding from the report and the document entitled *Mountain Valley Pipeline Project Phase II Work Plan, Pittsylvania, Franklin, Roanoke, Montgomery, and Giles County, Virginia* that four (4) of the potentially eligible sites - 44GS0231, 44GS0232, 44GS0235, and 44GS0236 - will be avoided by the project and no further archaeological study of these resources is warranted unless impacts are proposed. Depending

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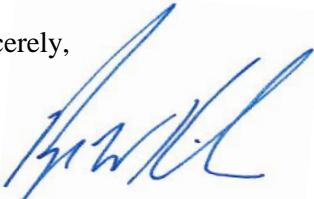
on the proximity of the final design to the sites, more detailed avoidance plans may be warranted to ensure site protection during construction.

Regarding the proposed scopes-of-work in the *Phase II Work Plan* for the Giles County sites, DHR recommends the following:

1. Sites evaluated at the Phase II level should be fully delineated, if possible.
2. The number of proposed test units per acre is low. Although DHR's *Survey Guidelines* suggest a 2-10% sampling at the Phase II level, it is our opinion that 10 1m x 1m test units per acre is reasonable.
3. Phase II analyses on all sites with significant alluvial or colluvial deposits, such as 44GS0237, would benefit from specialized geomorphological assessments.

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,



Roger W. Kirchen, Director  
Review and Compliance Division

c. Ms. Sydne Marshall, Tetra Tech