

**Mountain Valley Pipeline Project**

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

**Attachment DR6 Question 13g**



# COMMONWEALTH of VIRGINIA

Molly Joseph Ward  
Secretary of Natural Resources

**Department of Historic Resources**  
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December 30, 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, Franklin 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 28 miles of the total 36 miles of project area in Franklin County, VA. It is unclear whether the 28 miles refers only to the 300' pipeline study corridor or also includes access roads along this portion of the project. This confusion should be clarified and total acreage surveyed noted in a revised Section 1.0 which can be submitted separately to DHR and we will incorporate the new pages into the existing report. Archaeological survey of the remaining 8.5 miles will be completed and presented as an addendum to this report.

The survey identified 22 archaeological sites and 89 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 12 sites are *potentially eligible* for listing in the National Register of Historic Places (NRHP): **44FR0355, 44FR0357, 44FR0360, 44FR0363, 44FR0365, 44FR0366, 44FR0368, 44FR0369, 44FR0370, 44FR0371, 44FR0372, and 44FR0373**. Further, the consultant recommends and DHR concurs that the following seven (7) sites are *not eligible* for NRHP listing: **44FR0356, 44FR0358, 44FR0359, 44FR0361, 44FR0362, 44FR0374, and 44FR0375**. Finally, the consultant recommends the remaining three (3) sites as not eligible for NRHP listing; however, since significant and related deposits associated with these sites may be located beyond the study area, DHR recommends these sites as *unevaluated* for NRHP listing, but warranting no further work within the Area of Potential Effects (APE): **44FR0354, 44FR0364, and 44FR0367**.

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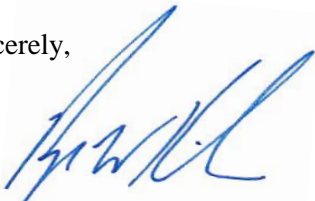
The 12 potentially eligible sites should be avoided or subjected to Phase II archaeological evaluation. It is our understanding from the report and the document entitled *Mountain Valley Pipeline Project Phase II Work Plan, Pittsylvania, Franklin, Roanoke, Montgomery, and Giles County, Virginia* that four (4) of the potentially eligible sites - 44FR0355, 44FR0357, 44FR0371, and 44FR0372 - will be avoided by the project and no further archaeological study of these resources is warranted unless impacts are proposed. Depending 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 Franklin 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 deposits would benefit from specialized geomorphological assessments, as recommended for site 44FR0368.

Please submit a revised Section 1.0 at your earliest convenience. 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