

Mountain Valley Pipeline Project

Docket No. CP16-10-000

Attachment DR6 Question 13h



COMMONWEALTH of VIRGINIA

Molly Joseph Ward
Secretary of Natural Resources

Department of Historic Resources
2801 Kensington Avenue, Richmond, Virginia 23221

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.

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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| Site No. | Tetra Tech Recommendation | DHR Recommendation | Comments |
|-----------------|----------------------------------|---------------------------|--|
| 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 | |