

Mountain Valley Pipeline Project

Docket No. CP16-10-000

Attachment DR6 Question 4a



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EEO/AA Employer

August 17, 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
Cultural Resources Survey Reports:
Addendum 2 to Volume I, Wetzel, Harrison, Doddridge, and Lewis Counties, WV
Addendum 2 to Volume II, Braxton and Webster Counties, WV
FR: 15-67-MULTI-42

Dear Ms. Landfried Neylon:

We have reviewed the reports, "Mountain Valley Pipeline Project, Cultural Resources Survey, Addendum 2 to Volume I, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia" and "Mountain Valley Pipeline Project, Cultural Resources Survey, Addendum 2 to Volume II, Braxton and Webster Counties, West Virginia" that Tetra Tech prepared for the aforementioned undertaking. 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.

According to the submitted reports, architectural and archaeological surveys were recently conducted within tax parcels located in Wetzel, Harrison, Doddridge, Lewis, Braxton, and Webster Counties, West Virginia where access had been previously denied and in areas of minor change to the proposed project's direct Area of Potential Effect (APE). The APE that was defined for this survey is consistent with the APE for the previously considered pipeline corridor.

Archaeological Resources:

Archaeological survey conducted within the tax parcels included the excavation of a total of 234 shovel probes within the revised APE. This resulted in the identification of two new archaeological resources in Braxton County, 46BX133 and 46BX134, one new archaeological resource in Wetzel County, 46WZ163, and three new resources in Lewis County, 46LE111, 46LE112 and 46LE113. No archaeological sites were identified within the remainder of the tax parcels surveyed and documented in these reports.

Resources 46BX134, 46LE112 and 46LE113 are described as prehistoric isolated finds, each consisting of a single non-diagnostic lithic artifact. Supplementary shovel probe excavation in the areas of the isolated finds were negative for additional archaeological materials. We concur that these resources are

not eligible for inclusion in the National Register of Historic Places and that no further work is necessary

Site 46BX133 is interpreted as an historic era artifact scatter associated with agriculturally related foundations of unknown function. The site also produced a single prehistoric lithic flake. The site dates to the 19th and early 20th centuries based upon cartographic evidence. The historic period artifact assemblage is comprised of domestic and architectural materials, including whiteware and stoneware fragments, wire and cut nails, window glass, amber, aqua and colorless container glass fragments, melted glass and slag. All artifacts were recovered from the Ap soil horizon or the nearby streambed. One intact circular stone and concrete foundation of unknown function and two concentrations of disarticulated cut stone blocks also were identified within the site boundaries. Due to the limited nature of the material assemblage and its lack of diagnostic markers and the site's lack of integrity, we concur that 46BX133 is not eligible for inclusion in the National Register of Historic Places and that no further work is necessary.

Site 46WZ163 is a low-density artifact scatter comprised of two non-diagnostic prehistoric lithic artifacts and a single plain whiteware fragment. All artifacts were recovered from the Ap soil horizon. Due to its small size, the mixed nature of the artifacts, and a lack of evidence suggesting the presence of cultural features, we concur that 46WZ163 is not eligible for inclusion in the National Register of Historic Places and that no further work is necessary.

Site 46LE111 is described as an historic era artifact scatter and an isolated root cellar dating to the late 19th through early 20th centuries. The site is located along an unnamed gravel farm road. Artifacts recovered from the site are concentrated in three separate loci and consist of three negligible prehistoric lithic flakes and 719 historic era artifacts. Cartographic evidence indicates that a number of structures were built and demolished within and near the site boundaries prior to 1966; of these, only the root cellar in Locus 2 remains extant. Nevertheless, no structural or other features were identified within the APE. The artifact assemblage includes fragments of plain whiteware, white and brown salt-glazed stoneware lacking maker's marks, milk glass, aqua and amber container glass, window glass, brick, ceramic drain pipe, rubber and leather footwear, and two mother-of-pearl buttons. However, nearly half of the historic era assemblage is composed of wire nails and colorless container glass, most of which is thought to be modern casual discard. In addition, most of the artifacts were recovered from fill deposits or A/Ap soil horizons, which indicates a lack of stratified deposits and makes it unlikely that various occupations or activity areas could be distinguished. As a result, the report concludes that Loci 1 and 3 are not likely to contribute significantly to our understanding of the area's history. Because a large quantity of wire nails was recovered from Locus 2, the report argues that this portion of the site may contain buried structural and other related features. We concur with these determinations.

It is our understanding that the proposed project will avoid the portion of Locus 2 located east of the existing farm road by reducing the proposed access road limits of disturbance (LOD). Protective fencing will also be placed at the edge of the LOD closest to the site to avoid unintended impacts. Provided that the portion of Locus 2 located east of the existing farm road is avoided, it is our opinion that the proposed project will have no adverse effect on site 46LE111 and that no further work is necessary.

In conclusion, we concur with recommendations made in the above referenced reports. We concur that sites 46BX133 and 46WZ163 and isolated finds 46BX134, 46LE112, and 46LE113 are not eligible for inclusion in the National Register. We also concur that Loci 1 and 3 of site 46LE111 are not likely to contribute significant information, but that Locus 2 should be avoided due to its potential for containing structural and other cultural features. Provided that Locus 2 of 46LE111 is avoided, we concur that the proposed project will have no adverse effect on archaeological historic properties and that no further work is necessary for these resources.

Architectural Resources:

The two reports indicate that no additional architectural properties were documented within the pipeline's APE in Wetzell, Harrison, Doddridge, Braxton, and Webster Counties. Conversely, surveyors identified one (1) architectural resource in Lewis County, a small root cellar (Temporary ID 0265). We concur with your recommendation that that root cellar is *not eligible* for inclusion in the National Register of Historic Places. It is not associated with events that have made a significant contribution to the broad patterns of our history, nor is it associated with the lives of significant persons in our past. It does not embody the distinctive characteristics of a type, period, or method of construction. Nor does it represent the work of a master or possess high artistic values. Thus, no further consultation is necessary regarding architectural resources within the described counties and project areas; however, we ask that you contact our office if your project should change. We anticipate receiving additional addendum reports for the aforementioned undertaking in the near future and will provide additional comments at that time.

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, or Mitchell K. Schaefer, Structural Historian, at (304) 558-0240.*

Sincerely,



Susan M. Pierce
Deputy State Historic Preservation Officer

SMP/LLD/MKS