



# 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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April 26, 2017

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, Addendum I, Franklin County, Virginia*  
DHR File No. 2014-1194; FERC #CP16-10

Dear Ms. Neylon:

We have received for review the report referenced 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.

This addendum presents supplemental archaeological survey of previously unsurveyed pipeline right-of-way (ROW) in Franklin County. This supplemental survey identified 34 archaeological sites and 35 isolated finds. Isolated finds are, by definition, not eligible for listing in the National Register of Historic Places (NRHP) and no further consideration of these resources is warranted. The consultant recommends 14 sites as potentially eligible for NRHP listing (although the Abstract and Conclusion erroneously state that 15 sites, including 44FR0393, are potentially eligible). Of those 14 potentially eligible sites, the consultant recommends that nine (9) should be evaluated at the Phase II level, while the remaining five (5) potentially eligible sites will be avoided. DHR supports these recommendations. We concur that 19 of the remaining sites are not eligible for NRHP listing; however, it is our opinion that site 44FR0389 should be managed as unevaluated because it has not been fully delineated. Please see the attached table for detailed comments on NRHP eligibility and treatment.

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,

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

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## ATTACHMENT

April 26, 2017

DHR File No. 2014-1194: FERC #CP16-10

<b>Site #</b>	<b>Tetra Tech Recommendation</b>	<b>DHR Recommendation</b>
44FR0191	Potentially Eligible; Phase II	Potentially Eligible; Phase II
44FR0376	Potentially Eligible; Phase II	Potentially Eligible; Phase II
44FR0377	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0380	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0381	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0382	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0383	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0384	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0385	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0386	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0387	Potentially Eligible; Avoid	Potentially Eligible; Avoid
44FR0388	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0389	Not Eligible; No Additional Work	Unevaluated; No Additional Work
44FR0390	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0391	Potentially Eligible; Phase II	Potentially Eligible; Phase II
44FR0392	Potentially Eligible; Avoid	Potentially Eligible; Avoid
44FR0393	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0394	Potentially Eligible; Avoid	Potentially Eligible; Avoid
44FR0395	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0396	Potentially Eligible; Phase II	Potentially Eligible; Phase II
44FR0397	Potentially Eligible; Phase II	Potentially Eligible; Phase II
44FR0398	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0399	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0400	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0401	Potentially Eligible; Phase II	Potentially Eligible; Phase II
44FR0402	Potentially Eligible; Avoid	Potentially Eligible; Avoid
44FR0403	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0404	Potentially Eligible; Phase II	Potentially Eligible; Phase II
44FR0405	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0406	Potentially Eligible; Phase II	Potentially Eligible; Phase II
44FR0407	Potentially Eligible; Avoid	Potentially Eligible; Avoid
44FR0408	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0409	Not Eligible; No Additional Work	Not Eligible; No Additional Work
44FR0410	Potentially Eligible; Phase II	Potentially Eligible; Phase II
44FR0411	Not Eligible; No Additional Work	Not Eligible; No Additional Work