



March 7, 2018

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EEO/AA Employer

Mr. Paul Friedman  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

RE: Mountain Valley Pipeline Project  
Cultural Resources Survey, Combined County Report 1  
FERC Docket No. CP 16-10  
FR: 15-67-MULTI-62

Dear Mr. Friedman:

We have reviewed the report titled *Mountain Valley Pipeline Project Cultural Resources Survey Combined County Report 1, Wetzel, Harrison, Braxton, Nicholas, and Greenbrier Counties, West Virginia*, which was submitted for the abovementioned 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.

The submitted report presents the results of Phase I survey that was conducted in Wetzel, Harrison, Braxton, Nicholas, and Greenbrier Counties resulting from changes in the proposed route's direct Area of Potential Effect (APE) and on tax parcels where survey permission was recently obtained. Twelve areas were investigated. The APE as defined for the current survey is consistent with that for the previously considered pipeline corridor.

Archaeological Resources:

Archaeological survey included pedestrian reconnaissance and the excavation of a total of 197 shovel probes. No cultural materials were identified within portions of the proposed project located in Wetzel, Harrison, and Braxton Counties. In addition, no cultural materials were recovered from the proposed access road MVP-NI-141.01 in Nicholas County, which is located near site 46NI808. The site was identified during earlier survey conducted for the undertaking. Those portions of the site containing intact surface and subsurface features were avoided via a shift in the pipeline corridor. The current survey confirmed that potentially significant deposits associated with 46NI808 remain outside of the project's direct APE.

In Greenbrier County, one new prehistoric isolated find, 46GB553, was identified within the proposed corridor for access road MVP-GB-179.01. The isolated find consists of a single, nearly complete projectile point that resembles an Early Archaic Amos type or Kirk corner-notched variant. The artifact was recovered from disturbed soils. The excavation of close interval shovel probes was negative for additional cultural material. Due to the limited nature of the assemblage and lack of intact deposits, we concur that 46GB553 is not eligible for inclusion in the National Register of Historic Places. We also concur that no further archaeological investigations are necessary for the portions of the undertaking



covered by the current report.

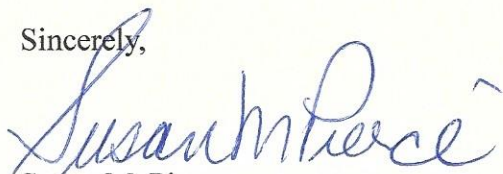
Architectural Resources:

We have reviewed the submitted information, which identified two (2) resources within Nicholas County: the Pardee & Curtin Lumber Company Railroad (NI-0231) and an associated Culvert (NI-0230). We concur those resources are not eligible for inclusion in the National Register of Historic Places under Criteria B or C; however, additional information would be necessary for our office to make a determination of eligibility for the rail line under Criterion A. Though the rail line has lost integrity of design, workmanship, and materials, it does retain integrity of location and setting. The associated culvert retains integrity of location, setting, design, workmanship, and materials. If the rail corridor were deemed eligible in the future, the culvert would contribute to that resource.

Despite our inability to make a comprehensive determination regarding those two (2) resources' eligibility at this time, we can concur the undertaking will have *no adverse effect* thereon. The submitted report indicates the culvert is not located within the project's limit of disturbance (LOD). Though the proposed pipeline will pass through the rail corridor, the rail ties and materials have mostly been removed. Any effects on the rail line would, therefore, occur within the setting and only a small portion of that will be affected. Thus, it is our opinion the undertaking will have a limited effect on the resource. No further consultation is necessary regarding architectural resources evaluated in the submitted Combined County Report 1; however, we ask that you contact our office if your project should change.

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

CC: Ms. Evelyn Tidlow, GAI Consultants