



The Culture Center
1900 Kanawha Blvd., E.
Charleston, WV 25305-0300

Randall Reid-Smith, Commissioner

Phone 304.558.0220 • www.wvculture.org
Fax 304.558.2779 • TDD 304.558.3562

EEO/AA Employer

April 24, 2016

Ms. Heather Millis
Office Practice Leader, Cultural Resources
TRC
50101 Governor's Drive, Suite 250
Chapel Hill, NC 27517

Re: Rover Pipeline Project
Doddridge, Hancock, Marshall, Tyler, and Wetzel Counties, West Virginia
FR#: 14-916-MULTI-5

Dear Ms. Millis:

We have reviewed the March 2016 REVISED DRAFT *Cultural Resources Survey for the Proposed Rover Pipeline Project, Doddridge, Hancock, Marshall, Tyler, and Wetzel Counties, West Virginia* that was submitted for the above-mentioned project to determine its effects to cultural resources. As required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties," we submit our comments.

According to submitted information, Rover Pipeline LLC (Rover) is currently seeking authorization from the Federal Energy Regulatory Commission (FERC) pursuant to Section 3 and 7(c) of the Natural Gas Act to construct, own, and operate the proposed Rover Pipeline Project (Project). The area of potential effect (APE) for archaeological resources is defined as the limits of proposed ground disturbance to a maximum depth of 15 feet below ground surface. The proposed undertaking's historic architectural APE includes all areas where ground disturbances are currently proposed as well as a 0.5-mile radius within those areas to consider potential visual effects.

Archaeological Resources:

The revised report presents the results of systematic archaeological survey conducted within the currently proposed West Virginia portion of the proposed project. This includes approximately 58.51 miles of the proposed pipeline alignment (Burgettstown, Majorsville, CGT and Sherwood Laterals), two compressor stations (Majorsville and Sherwood), a tie-in between the CGT and Sherwood Laterals, and a number of temporary work spaces and access roads. A geomorphological study was also conducted in a number of locations. The archaeological survey covered a 400-foot-wide study corridor that encompasses the APE. The survey corridor was reduced or adjusted in areas where it is collocated along an existing pipeline corridor. It is our understanding that the entirety of the proposed corridor has been surveyed.

During the investigations, 12 new archaeological sites (46DO83, 46DO84, 46MR227, 46MR228, 46MR229, 46TY57, 46TY58, 46TY59, 46TY60, 46TY61, 46TY77 and 46TY78) were identified. In

addition, the recorded locations of six previously identified sites (46DO1, 46DO44, 46HK15, 46MR48, 46MR79 and 46TY18) were revisited.

Sites 46DO83, 46DO84, 46MR228, 46MR229 and 46TY58 are identified as historic period sites dating to the late 19th to early 20th centuries. In general, the sites consist of the remains of a stacked stone chimney (46DO83), stacked stone wall segments (46DO84 and 46MR228) or foundation remnants (46MR229 and 46TY58). Sites 46DO83, 46MR228 and 46TY58 also have associated low-density artifact scatters. Sites 46MR227 and 46TY59 are identified as low-density lithic scatters of unknown temporal affiliation. Sites 46TY60 and 46TY61 are identified as low-density prehistoric lithic scatters with Late Archaic and Early Archaic associations, respectively. Site 46TY57 is a low-density multicomponent site comprised of three non-diagnostic prehistoric artifacts and a single rim fragment from an ironstone vessel. Sites 46TY77 and 46TY78 are historic period, low-density artifact scatters without associated architectural remnants. Investigation of sites 46DO83, 46DO84, 46MR227, 46MR228, 46MR229, 46TY57, 46TY58, 46TY59, 46TY60, 46TY61, 46TY77 and 46TY78 did not result in the identification of stratified artifact deposits, artifact patterning or evidence suggesting the presence of subsurface cultural features. As a result, we concur that these sites are not eligible for inclusion in the National Register of Historic Places.

Background research determined that previously documented sites 46DO1, 46DO44, 46HK15, 46MR48, 46MR79 and 46TY18 are located within or immediately adjacent to the proposed study area. Site 46DO1 is recorded as a Native American mound that was excavated in the 1930s. Site 46HK15 is recorded as the breastwork of a dam set into the creek bank. Sites 46MR48 is documented as a prehistoric village site; while 46TY18 is documented as a low density lithic scatter contained within the plowzone. Shovel probe excavation and pedestrian reconnaissance was conducted within the study area in the vicinity of these sites. No evidence of these sites was identified within the study area. As a result, in our opinion the proposed project will have no effect on these resources. Site 46DO44 is recorded as a stone wall. Shovel probe excavation within the wall's vicinity was negative for cultural materials. Site 46MR79 is documented as a prehistoric camp from which a single lithic artifact was recovered during the current survey. We concur that 46DO44 and 46MR79 are not eligible for inclusion in the National Register of Historic Places.

Finally, geomorphological investigations were conducted within the study area at three of the site locations (46TY57, 46TY59 and 46TY60) and along Sancho Creek and Fosters Run in Tyler County where alluvial soils are present but shovel probe excavation was not sufficient to determine the potential for deeply buried archaeological deposits. The investigations were conducted via trench and test unit excavation. Observations made during the study suggest that these landforms have little to no potential to contain archaeological deposits deeper than approximately 100 centimeters below the ground surface. We concur that no further investigations of these areas is warranted.

In conclusion, we concur that sites 46DO83, 46DO84, 46MR227, 46MR228, 46MR229, 46TY57, 46TY58, 46TY59, 46TY60, 46TY61, 46TY77 and 46TY78 are not eligible for inclusion in the National Register of Historic Places. We also concur that 46DO44 and 46MR79 are not eligible for

inclusion in the National Register of Historic Places. Furthermore, it is our opinion that the proposed project will have no effect on sites 46DO1, 46HK15, 46MR48, and 46TY18. In our opinion, the revised report sufficiently addresses the comments made in our February 25, 2015 letter and our concerns regarding archaeological historic properties within the proposed APE. We concur that no further investigations are necessary for archaeological resources.

Architectural Resources:

According to the draft survey, TRC Environmental Corporation (TRC) identified 237 previously-surveyed architectural properties within 1.0 mile of the proposed pipeline project in West Virginia. TRC Staff identified only three (3) resources within the Project APE: The Glen Rock Light (WZ-0030) in Wetzel County along the Ohio River; the Stender Cemetery (WZ-0089), also in Wetzel County; and a newly identified, but unnamed cemetery (TY-0066) in Tyler County.

TRC staff identified ten (10) previously-surveyed architectural properties within 1.0 mile of the undertaking in Doddridge County, none of which are located within the Project APE. No new architectural properties were identified in the Project APE in Doddridge County.

TRC staff identified 197 previously-surveyed architectural properties within 1.0 mile of the undertaking in Hancock County, none of which are located within the Project APE. Almost all of these resources are located in downtown New Cumberland along the Ohio River. No new architectural properties were identified in the Project APE in Hancock County during the survey of the Burgettstown Lateral corridor.

TRC staff identified twenty-two (22) previously-surveyed architectural properties within 1.0 mile of the undertaking in Marshall County, none of which are located within the Project APE. No new architectural properties were identified in the Project APE in Marshall County.

TRC staff identified six (6) previously-surveyed architectural properties within 1.0 mile of the undertaking in Tyler County. Though the McMullen Bridge is located within the Project APE, that resource has been replaced and the historic component is no longer extant. One (1) new historic property was identified in the Project APE in Tyler County: an unnamed cemetery (TY-0066), which is discussed below under Cemetery Resources.

The report indicates TRC staff identified two (2) architectural properties within 1.0 mile of the undertaking in Wetzel County, one (1) of which is located within the Project APE: the Stender Cemetery (WZ-0089), which is addressed below under Cemetery Resources. The report also discusses the Glen Rock Light (WZ-0030), which is located on the Ohio River in Wetzel County and is a typical example of a mid-twentieth century USCG navigation light. The report argues the light is not eligible for the National Register of Historic Places. We concur with this determination; however, the report is not clear whether the light is located within or outside of the Project APE. On page i, the report indicates the light is located within the Project APE, but then page 243 states that it is "located well

outside the Project corridor.” *Please clarify throughout the report the location of this and all historic architectural resources.* We will provide additional comments upon receipt these emendations.

Cemetery Resources:

One (1) new historic property was identified in the Project APE in Tyler County: an unnamed cemetery (TY-0066). TRC recommends this cemetery as not eligible for inclusion in the National Register. As stated in our May 19, 2015 letter (FR#:14-916-MULTI-4), we concur with this determination of eligibility.

The Paden Family Section of the Stender Cemetery (WZ-0089) is eligible for inclusion in the National Register, TRC argues, because it is the final resting place of Obediah Paden, founder of the nearby Paden City, and several of his family members. The report indicates there is no other known site that can be associated with Obediah Paden. Therefore, TRC argues is it eligible for the National Register under Criterion B and Criterion Consideration C. We concur with this determination. The report simply states that the cemetery will be avoided during construction and maintenance of the proposed Project corridor in accordance with West Virginia State Laws regarding the treatment of graves and human remains. Also, a buffer zone will be established around the mapped location of the cemetery in order to prevent any inadvertent damage to this resource. However, there is no discussion about the visual effects the proposed undertaking will have on the cemetery. *Please address in the report the proposed undertaking’s visual effects on the cemetery.*

Public Comment:

As stated in our previous letter, in light of the public interest focused on natural gas pipeline projects, we encourage Rover Pipeline LLC to provide multiple opportunities for public comment and educational outreach in the communities of the proposed Project corridor. To date we have not received any documentation of this public outreach; *please provide evidence of such to our office.* We will provide additional comments upon receipt of the requested documentation.

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/MKS/LLD