



August 12, 2016

Heather Millis
TRC Environmental Corp.
50101 Governors Drive, Suite 250
Chapel Hill, NC 27517

Re: Rover Pipeline Project
2016 Cultural Resources Survey and Addendum Report, Ohio
OHPOID: 2014-MLT-28468

Dear Ms. Millis,

This is in response to correspondence from your office dated May 31, 2016 (received June 2) and dated June 21, 2016 (received June 22) transmitting additional documentation on archaeological investigations for the above referenced project. Comments regarding the Archaeological Survey Addendum are located in Section I of this letter.

We also received several additional submissions of information regarding Cemetery Avoidance Plans and Assessment of Effects to Historic Architectural resources; dated March 25 (received March 28); dated June 15 (received June 17 (2 submissions)); and dated June 21 (received June 23, 2016). Comments regarding the Cemetery Avoidance Plans and Assessment of Effects to Historic Architectural Resources are located in Sections II and III of this letter, respectively.

Comments of the Ohio State Historic Preservation Office (SHPO) are offered pursuant to provisions of the National Historic Preservation Act of 1966, as amended, and its implementing regulations at 36 CFR 800.

I. Archaeological Survey Addendum:

The undertaking involves construction activities in Ohio along an extensive pipeline network. The correspondence transmits the report titled: "Addendum 1: Phase I Archaeological Survey for the Proposed Rover Pipeline Project, Noble, Monroe, Belmont, Harrison, Jefferson, Carroll, Tuscarawas, Stark, Wayne, Ashland, Richland, Crawford, Hancock, Wood, Henry, Defiance, and Fulton Counties, Ohio" by Heather Millis and Kelly Hockersmith, May 2016.

The report documents a survey of portions of the preferred, selected, corridor route that weren't available during the survey completed in 2014. The survey used standard techniques to identify archaeological sites and resulted in the identification of 29 archaeological properties (see attached tables).

By our count, 24 of the 29 identified archaeological sites identified in the Addendum Report are located in upland settings. This isn't surprising as most of the land in Ohio is outside of river valleys. Based on a preview of data from the Ohio Archaeological Inventory, this contrasts with the disproportionate high percentage of archaeological sites recorded, and especially the higher numbers of larger sites and village sites, in Ohio's river valleys. Although it isn't likely

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that most of Ohio's archaeological record would come from the uplands, it is becoming increasingly clear to us that there is a substantial amount of data on Ohio's archaeological record that could come from sites in upland settings. These data are not likely to come from sites that meet quotas for sheer number of artifacts or from numbers of artifact classes. These data are not likely to come from sites that have concentrations of features beneath the plowzone that can be easily identified by widely spaced (15 m) shovel tests.

Pipeline projects that are currently under review, including Rover, when constructed will destroy parts of many archaeological sites. One of our concerns for the preservation of important archaeological data is that there will be a cumulative impact. This cumulative impact includes sites that extend outside of the narrow survey corridor. That is, we are losing important archaeological record information from within the construction zone for long, linear projects before archaeologists complete a systematic identification of the archaeological sites as properties that can be evaluated for inclusion in the National Register of Historic Places.

As one example, in 1975 Dr. David Bush added information on archaeological site 33-AS-29 with a recommendation that the site should be listed in the National Register as a village site. Dr. Bush began the process of nominating the site to the National Register but the nomination was not completed and a formal Keeper's finding was not sought. The TRC survey in 2014 resulted in the recovery of one additional artifact from the general area of site 33-AS-29. Clearly this site is much more than one artifact. There can be many reasons why archaeologists might recover only 1 artifact some 30 years after another survey documented a much different assemblage. But why accept only the interpretation from the finding of 1 artifact?

Furthermore, because the site is recorded with a general boundary and the boundary was not based on intensive survey with shovel tests, there is an increased probability that there are substantial archaeological deposits located within or around the general site area shown on SHPO mapping and the TRC Rover Pipeline survey. It is not clear to us that further work at this site is warranted for this project, but the differences in the interpretations cannot be lightly dismissed. It is not certain to us what investigation techniques are needed to document a reasonable and good faith effort to identify and evaluate site 33-AS-29. In our thinking, this suggests to us at this time that we should not concur with a finding that this site is not eligible. However, until we have developed a clear understanding of what it is that archaeologists should be looking for at a site like 33-AS-29 and how archaeologists should go about it, the SHPO is not convinced that we should recommend additional field work at this site.

Regulations implementing Section 106 of the National Historic Preservation Act require federal agencies to take into account the effects of their undertakings stipulating that they shall consider, among other effects, direct and foreseeable consequences and cumulative effects. Given the impacts to more than 200 archaeological sites the SHPO offers our recommendations for preservation measures to include consideration of cumulative and direct

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and foreseeable effects. Within a scientific framework for archaeological analysis it is the opinion of the SHPO that archaeological investigations commensurate with Phase III data carried out at the following sites will provide a platform from which the federal agency may take into account the cumulative effects of the undertaking on historic properties. Therefore, we recommend archaeological investigations be conducted at sites 33-MO-158, 33-ST-1088, 33-WE-657, 33-HY-19, and 33-FU-227.

The SHPO requires that the CRM firm (or firms) retained for the additional archaeological investigations provide a research design to the SHPO, and other consulting parties as appropriate, for review and approval prior to the initiation of the investigations.

The TRC reports give emphasis to the preservation needs of a series of rockshelter sites identified in Monroe County. These sites can produce artifacts from primary contexts that have a good deal of scientific value. Also, please keep in mind that these sites are known to produce sensitive artifacts. As much as practical, our preference is to avoid impacts and archaeological testing in and around these rockshelter sites.

II. Cemetery Avoidance Plans

Within the initial Historic Architectural Survey, six cemeteries were carried forward for further analysis due to their proximity to the pipeline corridor. These include; ASD-576-07, BEL-1707-15, MOE-527-03, MOE-531-04, JEF-1018-07 and CAR-751-12. You have subsequently provided information about one additional cemetery identified as STA-3816-23.

We agree that the project area corridor is currently located along an alignment that is far enough from the cemeteries identified as ASD-576-07, BEL-1707-15, CAR-751-12, MOE-531-04 and MOE-527-03 so that protective measures will not be required at these locations. SHPO recommends that contractor notes should establish best practice measures to alert the construction crews to the presence of cemeteries.

However, for the cemeteries identified as JEF-1018-07 and STA-3816-23, markers are described as being out of place or missing in some instances and it does not appear that clear and well-defined boundaries exist for the cemeteries at these two locations. For both JEF-1018-07 and STA-3816-23, we recommend that additional field efforts should be conducted to better identify the actual location of the interments relative to the markers. If no additional insights are gained through field investigation, then a broad perimeter of temporary avoidance fencing should be placed around the area containing all remaining headstones and markers so as to include the most likely location of the interments.

To summarize, it is our opinion that no further evaluation is necessary for impacts to the seven cemeteries (see attached tables) and that with appropriate avoidance strategies, the currently proposed pipeline alignment should have no adverse effects on these properties. If any changes in the alignment or the method of construction should occur in proximity to these resources, we request that you should contact this office for additional consultation.

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III. Assessment of Effects to Historic Architectural resources

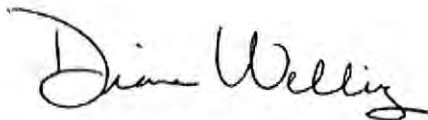
For the assessment of effects to historic architectural resources, seven historic properties were identified and carried forward for additional effects analysis. For five of the resources identified as HEN-649-10, WAY-351-12, MOE-526-03, HAS-309-11 and CAR-319-13, we agree that no further evaluation is necessary and that the currently proposed pipeline alignment should not have adverse effects on these properties. If any changes in the alignment or the method of construction should occur in proximity to these resources, we request that you should contact this office for additional consultation.

However, subsequent to the completion of the original survey report, the Stoneman House (CAR-266-12) was acquired from the property owner and is now owned by Rover. The current plan is for the house to be demolished. Whether the house is to be demolished or to remain in proximity to the proposed Mainline Compressor Station 1, it is our opinion that either alternative will have an adverse effect on this eligible historic property. We request that mitigation measures should be identified and that consultation should continue in anticipation of a formal agreement document that would memorialize any commitments made to mitigate adverse effects.

At CRA-721-03, the current proposal is to add vegetative screening to block direct views of the proposed Mainline Compressor Station 3. With the limited analysis available, it appears likely the introduction of both the Compressor Station and the vegetative screening will introduce major visual features that are likely to impair the historic character of this property. We request additional consultation regarding the possible adverse effects at this location. You may submit more detailed analysis to support a no adverse effect finding, or continue consultation about possible measures to avoid or reduce the likely adverse effects of this Compressor Station.

Any questions concerning this matter should be addressed to David Snyder or Lisa Adkins at (614) 298-2000, between the hours of 8 am to 5 pm. Thank you for your cooperation.

Sincerely,



Diana Welling, Department Head
Resource Protection and Review

DMS/ds (OHPOID: 2014-MLT-28468)

Table 1: Archaeological Sites (2016 Addendum Report)

OAI	SHPO	TRC	Affiliation	Description	
33-AS-29	??	NE	P (1)	upland	crop
33-AS-656	NEP	NEP	P (51)	upland	crop
33-AS-657	NEP	NEP	P (1)	terrace	crop
33-BL-489	Avoid	Avoid	H (10)	upland	crop
33-CA-501	NEP	NEP	H (0)	upland	forest
33-FU-227	?? (AT)	NEP	H (141)	upland	crop
33-FU-228	??	NEP	H (123)	upland	crop
33-FU-229	NEP	NEP	P (1)	upland	crop
33-HY-357	Avoid	NEP	P (5)	upland	crop
33-HY-360	NEP	NEP	P (17)	upland	crop
33-JE-267	Avoid	Avoid	H (7)	upland	pasture
33-JE-268	??	NEP	H (0)	terrace	ruins
33-MO-158	?? (AT)	NEP	P (74)	upland	crop
33-MO-159	NEP	NEP	P (6) H(21)	terrace	crop
33-MO-160	??	NEP	P (59)	upland	pasture
33-MO-161	NEP	NEP	P (1)	floodplain	crop
33-MO-162	NEP	NEP	P (1)	floodplain	crop
33-MO-163	NEP	NEP	H (0)	upland	forest
33-MO-164	NEP	NEP	H (0)	upland	forest
33-MO-164	NEP	NEP	H (0)	upland	forest
33-RI-597	NEP	NEP	P (1)	upland	crop
33-WE-786	NEP	NEP	P (1)	upland	crop
33-WE-787	NEP	NEP	P (3)	upland	forest
33-WE-788	NEP	NEP	P (1)	upland	pasture
33-WO-464	NEP	NEP	H (13)	upland	crop
33-WO-575	NEP	NEP	P (6)	upland	crop
33-WO-576	NEP	NEP	H (21)	upland	crop
33-WO-577	NEP	NEP	H (19)	upland	crop
33-WO-578	NEP	NEP	P (1)	upland	crop

NEP = Not an Eligible Property; Avoid = Follow agreed upon avoidance measures; NE = No Effect
 P = Prehistoric Component; H = Historic-era Component; AT = Archaeological Testing Program (Phase III)
 ?? = SHPO does not believe that there is sufficient information on this time to reach an eligibility finding

Table 2: Archaeological Sites (Additional SHPO Recommendations)

OAI	SHPO	TRC	Affiliation	Setting
33-HY-19	?? (AT)		Prehistoric village site at edge of ROW	Floodplain
33-ST-1088	?? (AT)	NEP	P (121)	Floodplain
33-WE-657	?? (AT)	NEP	P (162)	Terrace

NEP = Not an Eligible Property; Avoid = Follow agreed upon avoidance measures; NE = No Effect
 P = Prehistoric Component; H = Historic-era Component; AT = Archaeological Testing Program (Phase III)
 ?? = SHPO does not believe that there is sufficient information on this time to reach an eligibility finding

Table 3: Cemeteries and Buildings (Follow-up Consultation on Effects)

OHI	SHPO	TRC	Type
ASD-576-07	ELIG (NAE)	NEP	Cemetery
BEL-1707-15	ELIG (NAE)	NEP	Cemetery
CAR-266-12	ELIG (AE)	ELIG (AE)	I-house
CAR-319-13	UND (NAE)	NEP	I-house
CAR-751-12	ELIG (NAE)	NEP	Cemetery
CRA-721-03	UND (AE)	UND (NAE)	Craftsman house
HAS-309-11	UND (NAE)	UND (NAE)	Federal
HEN-649-10	UND (NAE)	NEP	Gable Ell
JEF-1018-07	ELIG (NAE) - Avoid	NEP	Cemetery
MOE-526-03	UND (NAE)	NAE	Vernacular
MOE-527-03	ELIG (NAE)	NEP	Cemetery
MOE-531-04	ELIG (NAE)	NEP	Cemetery
STA-3816-23	ELIG (NAE) - Avoid	NEP	Cemetery
WAY-351-12	ELIG (NAE)	ELIG (NAE)	Federal

ELIG = Eligible; AE = Adverse Effect; NAE = No Adverse Effect; NEP = Not an Eligible Property
 UND = Not sufficient information to complete eligibility evaluation (but can give effect recommendation)
 Avoid = Follow agreed upon avoidance measures