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**Randall Reid-Smith, Commissioner**

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EEO/AA Employer

February 25, 2015

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

RE: Rover Pipeline Project  
FR# 14-916-Multi-2

Dear Ms. Millis:

We have reviewed the cultural resources survey report 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.

Archaeological Resources:

The report contains the results of systematic archaeological survey conducted within the West Virginia portion of the proposed project. This includes approximately 57.02 miles of the proposed pipeline alignment (Burgettstown, Majorsville, CGT and Sherwood Laterals), two compressor stations (Majorsville and Sherwood) and a number of temporary work spaces, pipe yards, contractor ware yards and access roads. 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 archaeological survey covered a 400-foot-wide study corridor that, with the exception of the proposed access road locations, encompassed the APE. The survey corridor was reduced or adjusted where access was restricted by a landowner or where it is collocated along an existing pipeline corridor.

The report states that archaeological survey has not yet been conducted for approximately 1.5 miles of pipeline corridor, the Sherwood Compressor Station and a number of access roads due to a lack of landowner permission. These areas will be surveyed sometime in 2015 and the results submitted in an addendum report. In addition, the report recommends that deep testing be conducted within the study area at five locations along the Sherwood Lateral in Tyler County. These are in the vicinity of Foster Run and Sancho Creek and sites 46TY59 and 46TY60. We concur with this determination as per our guidelines, which require that some form of deep testing be conducted when alluvial soils are present. Please note that other areas may need to be deep tested and that backhoe trenches may be needed to properly assess the potential for buried deposits.

However, the current report provides insufficient documentation to enable our concurrence with other recommendations that were made. We ask that instead of providing an addendum report upon completion of the additional field work, a revised report is submitted that includes and considers the following:

- The report indicates that a number of previously documented archaeological sites, 46DO1 (Zahn Mound), 46DO44 (historic era stone wall), 46HK15 (Hukill Grist Mill Dam), 46MR48 (prehistoric village), 46MR79 (prehistoric habitation) and 46TY18 (prehistoric lithic scatter) are located within the currently proposed corridor. With the exception of 46MR48 and 46MR79, which are located in areas that have not yet been surveyed, the report does not provide sufficient detail about the level of investigation conducted and observations made at each site. It is unclear whether or how many shovel probes were excavated, the nature of the soils that were encountered, or whether disturbances were observed in each site location. This is especially problematic for 46DO1, which the report suggests is no longer extant. However, mounds often contain subsurface components such as burials and other features. It is unclear what level of field effort was conducted in the study area within vicinity of the mound's reported location. We reserve the right to ask that this area be revisited and shovel probed to ensure the mounds or their remnants are not located within the proposed pipeline corridor. Also, revised archaeological site forms may need to be completed for each site that was revisited.
- The report lacks maps indicating where shovel probe excavation occurred versus pedestrian walkover and does not indicate the total acreage that was surveyed. It would also be helpful if the access roads and labels depicted in Figure 1.2a – 1.2p were easier to see. Also, in many instances, the report's text references the incorrect map. For example, page 87 of the report refers the reader to Figure 1.2i to see the location on the north bank of Middle Island Creek where C horizon soils were not reached during shovel probing. However, in this figure, the study area traverses Pursley Creek rather than Middle Island Creek.
- The report lacks sufficient detail about the soils encountered in negative shovel probes, including representative profiles, observations that indicate disturbance, depths of soil strata encountered and how soils varied across the project area. For example, it is unclear what observations were made on terraces of the Ohio River within the Majorsville Lateral (see Figure 1.2m of the report) and why no recommendation for deep testing of this area was made. The same is true for terraces to the west of Middle Island Creek along the Sherwood Lateral (see Figure 1.2e). This is especially critical for river terraces, which have a high potential for containing deeply buried archaeological deposits. We reserve the right to ask for deep testing of these portions of the study area as necessary.
- Please include additional representative photographs documenting areas that were surveyed with negative results and the nature of the topography and disturbances that were encountered throughout the study area, such as along the many access roads that were surveyed.
- It is unclear from mapping provided in the report where the Sherwood Compressor is proposed for construction. However, please be aware that a number of surveys have been conducted and

archaeological sites identified in the Morgansville and Sherwood areas that are not yet available on our online GIS.

- When the revised report is submitted for review, please note that we will also need a new PDF copy of the report. We will not need new PDFs of the site forms that have already been submitted.

Architectural Resources:

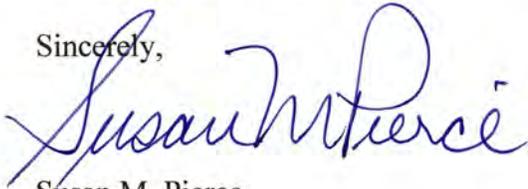
We are unable to complete our review with the information provided. Tables 6.2, 7.2, and 8.3 list previously recorded historic architectural properties within one mile of the project area in Hancock County, Marshal County, and Tyler County, respectively. However, these resources are not shown on any of the figures. Please provide our office with revised figures so that our office may provide further comment.

Cemetery Resources:

The previously undocumented cemetery has been assigned trinomial number 46-TY-66. Please note for future reference that cemetery inventory forms, like archaeological site forms, should be submitted in advance of submitting a cultural resource report so that the trinomial number can be used in the text of the report. Please reference this number in the revised report.

We appreciate the opportunity to be of service. *If you have questions regarding our comments or the permit conditions, please contact Lora A. Lamarre-DeMott, Senior Archaeologist, or Jeffrey S Smith, Structural Historian, at (304) 558-0240.*

Sincerely,



Susan M. Pierce  
Deputy State Historic Preservation Officer

SMP/LLD/JSS