



*The Culture Center*  
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**Randall Reid-Smith, Commissioner**

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EEO/AA Employer

August 11, 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-6 and 14-916-MULTI-7

Dear Ms. Millis:

We have reviewed the June 2016 FINAL DRAFT *Cultural Resources Survey for the Proposed Rover Pipeline Project, Doddridge, Hancock, Marshall, Tyler, and Wetzel Counties, West Virginia* that TRC Environmental Corporation (TRC) 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) seeks 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.

Architectural Resources:

As noted in the report and our previous correspondence, TRC identified 237 previously-surveyed above-ground resources within 1.0 mile of the proposed pipeline project and a possible reroute in West Virginia. Only four (4) of those resources are located within the proposed and/or possible project APE: The Rousseau-Couture Cemetery (46-DO-113); the Stanley Cemetery (46-DO-114); the Stender Cemetery (46-WZ-156); and an unnamed cemetery (46-TY-66). These four cemeteries are addressed below under Cemetery Resources.

The report indicates that the Glen Rock Light (WZ-0030) in Wetzel County along the Ohio River is not located within the proposed or possible APE, but it was documented for the proposed undertaking. According to the report, there are no other architectural properties or resources located within the project APE. We concur with this finding.

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The final draft report addresses our concerns regarding architectural resources. No further consultation is necessary regarding architectural resources; however, we ask that you contact our office if your project should change.

Cemetery Resources:

TRC identified four (4) cemeteries within the proposed and/or possible project APE: The Rousseau-Couture Cemetery (46-DO-113); the Stanley Cemetery (46-DO-114); the Stender Cemetery (46-WZ-156); and an unnamed cemetery (46-TY-66). TRC recommends the Paden Family Section of the Stender Cemetery (46-WZ-156) is eligible for inclusion in the National Register of Historic Places 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, it is eligible under Criterion B and Criterion Consideration C. We concur with this finding. We also concur with TRC's recommendations that the Rousseau-Couture Cemetery (46-DO-113); the Stanley Cemetery (46-DO-114); and the unnamed cemetery (46-TY-66) in Tyler County are not eligible for inclusion in the National Register.

TRC's assessment is that the proposed undertaking will have *no adverse effect* to the Stender Cemetery because it is located 1,800 feet (0.34 miles) from the project APE and it is unlikely that the viewshed of this resource will change due to any vegetation clearing. We concur with this assessment.

The final draft report addresses our concerns regarding cemetery resources. No further consultation is necessary regarding architectural resources; however, we ask that you contact our office if your project should change.

Public Comment:

In your June 30, 2016, letter, you indicated that public meetings and open houses have been held on at least three separate occasions to inform local residents about the proposed undertaking. Notable meetings were held on July 8, 2014, in New Martinsville, West Virginia; on November 18, 2014, in Paden City, West Virginia; and on April 4, 2016, again in Paden City, West Virginia. We understand that any correspondence or comments will be sent to our office.

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