



January 20, 2012

Mr. John P. Dornblazer
WV Department of Environmental Protection
105 South Railroad Street, Suite 301
Philippi, WV 26416

RE: Brooks Run Mining Co., LLC Hoover's Landing Surface Mine
FR#: 11-1031-WB-2

Dear Mr. Dornblazer:

We have reviewed the provided technical reports for the above referenced undertaking. 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 technical report *Archaeological Identification Survey for the Proposed Hoover Landing Surface Mine Glade District, Webster County, West Virginia* addresses our concerns regarding the potential for archaeological resources within the project area. According to the report, one previously identified archaeological site, 46WB367, and three new archaeological sites; 46WB368, 46WB369, and 46WB370 were documented during the systematic survey.

- ▲ 46WB367 is described as an upland rockshelter site tentatively affiliated to the Middle or Late Woodland period. The site retains integrity and shovel test excavations resulted in the identification of ceramics, a large quantity of lithic debitage, two formal flaked tools and one groundstone tool. As such, the consultant suggest that the site has the potential to yield data that may further our understanding of upland resources exploitation and settlement during the Woodland period.
- ▲ 46WB368 is also described as a multi-component upland rockshelter site with Early and Late Woodland occupations. The assemblage of artifacts is functionally diverse, including diagnostic ceramics and stone tools. Further, two soil anomalies were identified during STP excavation which indicate that the site has the potential for intact cultural feature. The Phase I excavation also suggests that at least two stratified cultural deposits are present within the site boundary. As such the consultant concludes that the site has the potential to yield data that may further our understanding of upland resources exploitation and settlement during

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EEO/AA Employer

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- ^ the Woodland period in this region.
- ^ 46WB369 is described as a prehistoric upland rockshelter site of unknown age and cultural affiliation. Due to the small number of artifacts, most of which were found at the surface and the limited functional range of the assemblage, no further work was recommended for this resource.
- ^ 46WB370 is also described as a prehistoric upland rockshelter site of unknown age and cultural affiliation. Due to the small number of artifacts and the limited functional range of the assemblage, no further work was recommended for this resource.

Rockshelter sites 46WB369 and 46WB370 were not recommended eligible for the NRHP. We concur with this recommendation. No further consultation is necessary with regard to 46WB369 and 46WB370. However, the consultant recommends that 46WB367 and 46WB368 be avoided by the proposed project or that Phase II test excavations should be undertaken to evaluate their eligibility for the National Register of Historic Places. We concur with this recommendation. If these resources cannot be avoided by the proposed undertaking we request that Phase II evaluation be completed. A scope of work for each site should be submitted to our office for review prior to the start of the Phase II excavations.

Architectural Resources:

We have reviewed the *Cultural Historic Survey for the Proposed Brooks Run Mining Company, LLC, Hoover's Landing Surface Mine, Webster County, West Virginia*. The viewshed analysis revealed three buildings 50 years or older within the visual and blasting area of potential effect (APE) for this project. It is the consultant's opinion that the three buildings, all located near the community of Boggs, are not eligible for inclusion in the National Register of Historic Places. After review of the submitted information and completed Historic Property Inventory (HPI) forms, we concur with this assessment. It is the consultant's opinion that the proposed project will have no impact on architectural resources eligible for or included in the National Register of Historic Places. We concur with this assessment. No further consultation regarding architectural resources is necessary.

We also want to note that the report was thoughtful, thorough, well written and well researched. Such reports greatly accelerate the review process by providing needed information in a clear and timely manner. We appreciate the applicant's efforts in supplying this information for review.

Cemetery Resources:

Three cemeteries were documented within the APE during the course of the systematic survey. The Thomas Mountain Cemetery, 46WB362, the Bragg Run Cemetery, 46WB371, and the Bragg Family Cemetery, 46WB372. According to the report, none of the documented cemeteries are eligible for the NRHP under Criteria D. We concur with this recommendation. It is the consultant's opinion that none of the cemeteries are eligible under Criteria A-C, Criteria

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Considerations C and D. After review of the submitted information, we concur with this assessment. No further consultation regarding cemetery resources is necessary.

We appreciate the opportunity to be of service. *If you have questions regarding our comments or the Section 106 process, please contact Shirley Stewart Burns, Structural Historian, or Kristin D. Scarr, Archaeologist, at (304) 558-0240.*

Sincerely,

A handwritten signature in cursive script that reads "Susan M. Pierce". The signature is written in black ink and is positioned above the printed name.

Susan M. Pierce
Deputy State Historic Preservation Officer

SMP/SSB/KDS

cc: Jeffrey Davis, Summit Engineering.