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EEO/AA Employer

September 6, 2005

Ms. Karen Niemel, PhD
Environment & Archaeology
7736 Highway 42
Suite D 3/5
Florence, KY 41042

RE: Lost River Watershed – Dam Site 16
FR#: 05-1190-HY

Dear Ms. Niemel,

We have reviewed the report, “Phase I Cultural Resources Report for Dam Site 16, Lost River Watershed, Hardy County, WV,” submitted for the above mentioned project. 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 satisfactorily addresses our concerns regarding the presence of archaeological resources within the proposed project area. It is our understanding that systematic pedestrian and subsurface survey resulted in the identification of 15 isolated find sites and 8 prehistoric archaeological sites. No further work is recommended for the isolated find sites, 46Hy503 – 46Hy517, because they will not likely yield significant information about West Virginia’s prehistory. We concur with that recommendation and have determined that sites 46Hy503 – 46Hy517 are not eligible for inclusion in the National Register of Historic Places. Sites 46Hy498, 46Hy499 and 46Hy599 each represent a low density lithic scatter with little ability to produce significant information. It is recommended that no further work occur at these sites. We concur with that recommendation and have determined that sites 46Hy498, 46Hy499, and 46Hy599 are not eligible for inclusion in the National Register of Historic Places.

Sites 46Hy495, 46Hy496, 46Hy497 and 46Hy501 represent moderate-density lithic scatters. Temporally diagnostic artifacts were recovered from two of these sites, 46Hy496 and 46Hy501. Site 46Hy502 consists of a series of rockshelters that produced lithic and prehistoric ceramic artifacts dating to the Woodland Period. Although cultural features were not identified, the amount and variety of lithic artifacts and presence of diagnostic materials suggest a variety of activities occurred at each location. Each site may have the ability to increase our understanding of West Virginia’s prehistory. Therefore, it is

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recommended that sites 46Hy495, 46Hy496, 46Hy497, 46Hy501 and 46Hy502 be avoided by the proposed project. If they cannot be avoided, it is recommended that Phase II testing occur at each site in order to determine their eligibility for inclusion in the National Register of Historic Places. We concur with that recommendation. It is our understanding that sites 46Hy495, 46Hy497, 46Hy501 and 46Hy502 cannot be avoided by the proposed project. Therefore, we request that they undergo Phase II testing. We will be happy to discuss scopes-of-work for each should you request our input.

Finally, it is unclear from the report whether subsurface survey was conducted in the vicinity of architectural resources HY-107 and HY-108, both of which fall within survey segment R. Please clarify whether subsurface survey was conducted. If not, please explain the reasoning behind this decision.

Architectural Resources:

The West Virginia State Historic Preservation Office has reviewed the proposed Lost River Watershed Project in Hardy County for impacts to architectural resources. It is our understanding that "the project entails the construction of a new dam, the permanent flooding of approximately 50 acres of land, and the creation of an incidental recreation area and flood pool area." This area of Hardy County has not been surveyed for the presence of architectural resources eligible for inclusion in the National Register of Historic Places. We have reviewed each structure surveyed as part of the aforementioned project separately for clarity as follows:

HY-0104: We cannot concur with your determination that this house is not eligible for inclusion in the National Register of Historic Places, additional information would be required to make a determination. However, this farm is located outside of the proposed project area. The viewshed from the house and associated outbuildings has the potential to be impacted visually by the proposed project but this office is of the opinion that this will not adversely impact its National Register eligibility if it were determined eligible for inclusion in the National Register of Historic Places. The proposed project will have no effect to HY-0104.

HY-0105: We concur with your determination that this barn/equipment shed does not meet the National Register Criteria for Evaluation and is therefore not eligible for inclusion in the National Register of Historic Places. The barn/equipment shed is not individually exceptional and does not appear to be associated with any standing farm complex. The proposed project will have no effect to HY-0105.

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HY-0106: We concur that due to modifications to the exterior of HY-0106 it no longer meets the National Register Criteria for Evaluation and is therefore not eligible for inclusion in the National Register of Historic Places. The proposed project will have no effect to HY-0106.

HY-0107: HY-0107 is located within the proposed project area and is slated for demolition. We concur with your determination that this house and associated springhouse remains do not meet the National Register Criteria for Evaluation and is therefore not eligible for inclusion in the National Register of Historic Places. The house is not an outstanding example of design and has been modified by modern windows and vinyl siding.

HY-0108: HY-0107 is located within the proposed project area and is slated for demolition. We concur with your determination that this house and associated outbuildings do not meet the National Register Criteria for Evaluation and is therefore not eligible for inclusion in the National Register of Historic Places. The house has been modified with several additions that have adversely impacted the historic integrity of the structure. The proposed project will have no effect to HY-0108.

No further consultation is necessary with this office regarding architecture for this project.

We appreciate the opportunity to be of service. If you have any questions regarding our comments or the Section 106 process, please contact me or Ryan Burns, Historian, at (304)558-0240.

Sincerely,



Lora A. Lamarre
Senior Archaeologist