

**Augusta County Historical Society
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April 6, 2017

Kimberly D. Bose, Secretary
Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

**RE: Comments on DEIS for Atlantic Coast Pipeline/Docket Number CP15-554
Effect of the Proposed Atlantic Coast Pipeline on Historic Properties – Comments and
Request from Augusta County, VA**

Dear Ms. Bose and Mr. Davis:

I am writing to you as an intervenor representing the Augusta County Alliance. I also represent the Augusta County Historical Society that has appointed me to act as its representative to make comments on the Section 106 Process regarding the cultural resources in Augusta County that are within the Area of Potential Effect (APE) of Dominion's Atlantic Coast Pipeline. As such your agency (FERC) as well as Dominion in agreement with the Virginia Department of Historic Resources has allowed me unlimited access to the files submitted by Atlantic's architectural and archaeological consultants in the cultural resources surveying process. I would like to thank your agency (FERC), the Atlantic Coast Pipeline LLC (ACP LLC), and the Virginia Department of Historic Resources (DHR) for allowing the Augusta County Historical Society the opportunity to review the findings of the Architectural and Archaeological Surveys of the Atlantic Coast Pipeline in Augusta County, conducted by the Dovetail Group, NRG, and ERM. Based on our review of those survey reports, we are writing to express serious concerns about the accuracy and adequacy of ACP LLC's efforts to identify, record, and evaluate cultural resources in Augusta County within the APE. We also question the ACP LLC's preliminary determination of effects on those historic properties. For instance, we would like to point out the different levels of attention paid to potentially significant properties depending on whether the ownership was private or public (in the George Washington National Forest).

We have found that the consultants on both the archaeological and the architectural portion of the surveys have failed to identify a number of potentially significant resources. We offer several here simply as examples of what we see as a major flaw in the overall study. Further, we question the fact that the overwhelming majority of the findings were deemed

ineligible for the National Register of Historic Places, apparently without specific research or, in most cases, without stepping foot on the property. In some cases, it is also apparent that the consultants were not even within the vicinity of the properties as at least two structures are listed as extant (and one deemed potentially eligible for the NRHP) that have not been standing for years. In most instances, however, properties were dismissed as not eligible for the NRHP with no apparent research. Just a few examples: Buckhorn Inn on Rt. 250, at least two houses on the Warm Springs Turnpike in Deerfield, and several houses on the edge of the Stuarts Draft village. Without an adequate survey and assessment of the history and integrity of those structures, it is not possible to begin to determine the effects of the ACP within the APE or the eligibility of those structures for register listing. That survey and assessment should consider whether these contributing resources may be individually eligible for register listing. Considering the number of historic resources in Augusta on the proposed 56-mile route, it seems inconceivable that the overwhelming majority of those would be dismissed without even the most minimal research.

Further, while the surveyors identified a few linear resources, they failed to identify a number of significant linear resources along the route, including one extant and one extinct railroad, the Great Wagon Road, and several turnpikes.

We hereby offer several examples of instances where the surveys fell short of the legal standards in Section 106. We would like to emphasize that we do not feel like these are the only instances of inadequacies, but rather are indicative of a subpar cultural resource assessment of the ACP within the APE in Augusta County.

Two significant resources stand out to us as areas of high concern, one is prehistoric and the other is historic. The first is the almost complete dismissal of Native American artifacts along the entire route, despite overwhelming evidence that the entire county is replete with evidence that would help tell the story of nearly 10,000 years of indigenous culture on the landscape of Augusta County. Of particular concern is the proximity of the pipeline to significant finds surrounding the East Burial Mound in Churchville, Va., and along Back Creek in the Sherando area. There were also significant finds in Deerfield. The findings of the ACP survey team near the East Burial Mound that were summarily dismissed as not important, appear to be linked to two previous archaeological sites that contained human interments and other culturally significant finds in close proximity. **We feel like the route needs to be altered significantly to avoid this area, that further archaeological investigation needs to occur on any new site, and that Tribal Consultation needs to be continuous as this develops.** The significant findings in Deerfield and Sherando point to a need to reconsider the route through those areas as well.

Another significant omission pertains to the historic stone walls along the slopes of the Blue Ridge Mountains in eastern Augusta County. These mortar-less stone walls are important cultural markers of the early Ulster Scots who settled this land. The walls, which resemble those used for agricultural purposes in the north of Ireland and before that in Scotland, were used to enclose livestock, surround gardens, and mark property lines. **Destruction of these important cultural landscape markers would be permanent and could not be mitigated.** These walls exist on at least five properties being impacted by the ACP. They are documented by the surveyors on two properties and, although initially dismissed by NRG, it is recommended on two properties that the walls be avoided and that further research be done to determine

eligibility. The walls that are the most intact and also that will be the most extensively impacted are those owned by Hazel Palmer. Despite the fact that Dominion's engineering crew has produced drawings noting some of the walls in the direct path of the pipeline, these walls are not mentioned on any cultural resource documents.

Finally, we feel that along the 56 miles of proposed pipeline in Augusta County there will be significant visual impacts to the historic resources and landscape. A thorough study of these impacts needs to be done, but until a more accurate assessment of the cultural resources has been completed, it is premature to assess visual effects. When it is completed, determinations of effects should employ state-of-the-art elevation modelling and photo simulation to show the impacts of the project on cultural landscapes, view sheds, historic districts, contributing resources in historic districts and historic properties eligible for National Register listing. According to the Advisory Council on Historic Preservation (ACHP), the Section 106 review process is designed to take into account alternatives that avoid or minimize adverse effects. **The ACHP holds that consideration of alternatives and determinations of effect and completion of the Section 106 review process under the National Historic Preservation Act of 1966 as amended should precede award by your Commission of a construction certificate to the ACP LLC.**

Further, it is suggested that the DEIS in regard to Augusta County be discarded and a new and more thorough study be launched that more accurately identifies cultural resources, both historic and prehistoric, and assesses potential impact.

Thanks for your consideration in these matters. I am available to answer in questions that might arise in regard to the cultural resources of Augusta County.

Sincerely,



Nancy T. Sorrells, Board Member
 Augusta County Historical Society
 Augusta County Alliance Co-chair
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Cc: Robert Bishka, Senator Mark Warner, Senator Tim Kaine, Congressman Robert Goodlatte, Governor Terry McAuliff, Senator Emmett Hanger, Delegate Richard Bell, Delegate Steve Landes, Augusta County Board of Supervisors Chairman Tracy Pyles, Augusta County Administrator Tim Fitzgerald, Advisory Council on Historic Preservation Director John M. Fowler, Secretary of Natural Resources Molly Ward, and Department of Historic Resources Director Julie V. Langan.

**Submitted by the Augusta County Historical Society and Augusta County Alliance
FERC Atlantic Coast Pipeline Docket #CP15-554-000
General comments regarding the Cultural Resource Inventories for the ACP in Augusta
County, including Architectural comments as well as comments on the Phase I & Phase II
Archaeological investigations in Augusta County**

Uneven quality of archaeological surveys

The general professionalism of the Phase I archaeological surveys has been disappointing. The difference in time and testing methods spent on private land as compared to public lands such as the George Washington National Forest is shocking. Compare, for instance, the prehistoric site survey report in the Deerfield area (44AU0910) in which the site type is described as basically “Lithic scatter, Native American.” The survey strategies are described as “Subsurface testing. Surface Testing.” The form was filled out with short sentences with no further explanation. Despite the fact that the site yielded 12 positive shovel tests out of 38, it was deemed not eligible for the National Register or for Phase II investigation.

A comparison of the Deerfield report, on private land, with another prehistoric site on federal land (44AU0917) clearly shows the double standard to which property is held. The survey description on the Deerfield property says “Phase I Survey.” The same entry for the Forest Service survey is 16 lines long and contains detailed survey information. In Deerfield the entry under “Artifacts Summary and Diagnostics states “Debitage and FCR.” The Forest Service entry is 14 lines long and has lengthy descriptions about the lithic artifacts that were discovered. With no exceptions, every Forest Service archaeological site was held to this higher standard of survey and reporting. (See pages 1-4 of Augusta County attachment)

Overall lack of integrity for the archaeological surveys

This double standard and casual dismissal of the majority of the sites within Augusta County strongly suggests that many archaeological surveys are lacking in enough detail to make a final recommendation either for National Register eligibility or for a Phase II survey. Further, the cultural resource surveys missed or did not report a number of resources within the 300-foot survey corridor from the pipeline centerline.

The following are simply a few examples and are not meant to be inclusive by any means. The conclusion should be that the entire archaeological survey for Augusta County is deeply flawed, lacks basic information, and needs to be redone.

1. The Missing Archaeological Survey: The Jonathan Harper House (007-0233) This house, which is listed on the National Register, is within the APE for the ACP. It is located in Stuarts Draft. It does appear in the DEIS on pg. 604. However, despite the fact that the house has been listed for a number of years, the information presented in the DEIS is inaccurate. It notes that the cultural association is “unknown” (it is an historic farmstead). Dominion appears not to know that the structure is already on the Register as it is listed as “unevaluated.” According to the couple who lives in the house, one of whom is a trained historian, the Phase I archaeological survey turned up very interesting 18th-century historic artifacts in the vicinity of the rumored first house for the site. The archaeologists were excited by the find, made notations, reburied the artifacts, and said they would return. They also indicated to the homeowners that the find might mean a shift in the pipeline path.

The lack of further analysis is troubling for several reasons. The survey report submitted to DHR notes that in 2005 during the eligibility hearing “archaeology significance should be considered during the research phase of the nomination work. [Board member Barbara Heath said] she felt that the information in the PIFs indicated potential for Criterion D or notation that an archaeological component of the property should be highlighted for further/future research. It is noted that on Feb. 2, 2015, the Dominion Architectural Survey team for Dominion ACP (Dovetail CRG led by Stephanie Jacobs) reviewed the file so they would have been aware of the archaeological potential for the property. IT IS IMPORTANT TO NOTE THAT APPARENTLY NO PHASE I ARCHAEOLOGICAL REPORT HAS EVER BEEN FILED FOR THE SITE AND NO SURVEY TEAM HAS RETURNED. (See Harper House Attachment)

2. The cultural resources survey teams did identify several linear resources along the route, including the C&O Railroad and a section of the Staunton-Parkersburg Turnpike. (Although the date on the C&O Railroad listed in the DEIS for the railroad’s arrival in Augusta County is off by two decades.) The team failed to identify several other key linear resources that will be crossed by the pipeline. A glance at the 1885 Augusta County map by Jed Hotchkiss would have pinpointed all of these resources, so it is hard to justify why they are not identified and at least targeted for an initial survey. While time might have erased historic evidence in these examples, the sites deserve at least the level of attention given that VDOT gives to road projects along historic linear corridors.

These resources include:

1. The Middlebrook-Brownsburg Turnpike (Rt. 252) from Staunton to Brownsburg.
2. The historic B&O Railroad that ran parallel to the Valley Pike. This railroad is no longer operating, but the remaining railroad bed will be crossed by the pipeline path at Folly Farms. Folly Mills Station Road will be used as the pipeline path and might have associated railroad resources as well.
3. The historic (and still existing) Shenandoah Valley Railroad, now Norfolk Southern, will be crossed by the pipeline route in the vicinity of Stuarts Draft.
4. The Howardsville Turnpike will also be crossed by the pipeline route east of Stuarts Draft.
5. Historic Rt. 11 that is also the Valley Pike and the Great Wagon Road will be crossed at Folly Mills.
6. Warm Springs Turnpike will be crossed in the Deerfield Valley
7. The Staunton-Parkersburg Turnpike. Further information on this resource will be provided by the Shenandoah Valley Battlefields Foundation.

The crossing at U.S. Rt. 11 at Folly Farm (007-0015) is particularly fraught with worry. The historic farmstead, which as noted in the DEIS is on the National Register and should be avoided or mitigated, is one of the most historic properties in the county. The house and the unique serpentine walls, reputedly designed by Thomas Jefferson, could be heavily damaged by any blasting that takes place. The damage could be irreparable. Archaeological surveys did document a slave cemetery on the property that will be avoided. However this crossing has a number of other cultural resources that will be impacted. Further, shifts in the route along this section are fraught

with other concerns as this is the area where the environmentally significant Cochran's Caves are located, as well as sensitive aquifers, and Augusta County's sealed landfill cells just across I-81. The section of the interstate where Dominion is proposing to drill under is a section that regularly deals with sinkhole concerns.

That said, the historic resources that have to be dealt with from Stingy Hollow Road to White Hill Road on this section of the proposed route are significantly understated by Dominion. Starting on the western section of this area are the archaeological remains of Cochran's Mill and the associated millrace. (This is at the Stingy Hollow/Old Greenville Road intersection). There is also a brick house on Old Greenville Road at the same crossing that could be eligible for the National Register. The route that heads east quickly encounters concerns about Folly Farm, its outbuildings, its historic walls, and its slave cemetery. At the U.S. Rt. 11 crossing is the B&O railroad bed and its associated resources that need to be examined.

3. There are other archaeological resources that have surfaced and have not been identified by Dominion's contracted surveyors. One example is a lime kiln located within 100 feet of the pipeline route on the East property near Churchville. This 19th-century industrial site deserves at least a Phase I investigation. **(See pages 5-6 of Augusta County attachment)**

Native Americans in Augusta County: Archaeologists know very little about the Native American population of Augusta County beyond the fact that significant occupation (as is evidenced by an abundance of artifacts) occurred continuously from the Archaic period (ca. 10,000 B.P.) to the late Woodland period (ca. 1700 A.D.). Experts know enough to trace generally the evolution from a hunter-gatherer society to a more permanent village culture during that period. Artifacts show an extensive East Coast trading network. A series of burial mounds gives a small glimpse into a sophisticated hierarchical society, but the heretofore rather superficial archaeological surveys have only provided tantalizing glimpses into 10,000 years of a highly developed society and culture. Beyond those sketchy generalizations, we know almost nothing about these people: who they were, how they lived, and why they disappeared. It is literally a vacuum of information. Therefore EVERY prehistoric artifact that is found in Augusta County is useful; it is reckless to dismiss any find as insignificant when it suggests that there is intact material culture beneath the surface. The 300-foot APE has the potential of irrevocably destroying any opportunity to learn more about a culture that once flourished in the Upper Shenandoah Valley.

Despite numerous sites that revealed prehistoric evidence within the 300-foot APE, Atlantic's contractors referred just two sites, one in Deerfield (44AU0907) and one in Sherando (44AU0873), for Phase II study and from that just one site (44AU0907) on the 56 miles of the proposed route in Augusta County was deemed as potentially eligible for the National Register. (As of March 16, 2017 the route had not been adjusted to avoid that site.) The second site, a large tool making site that spanned a period of several millennia, and appeared to be connected to a larger site that could reveal even more about the culture, was not deemed eligible for the register by the contractor archaeologists. The January 2017 supplemental filing noted of that site: "In general, the prehistoric assemblage represents multiple lithic reduction episodes that utilized raw material common to the area. It appears that site activities during most or all occupations were focused on tool production and maintenance." Nonetheless, it was concluded that "44AU0873 has very little research potential. Therefore, it is recommended ineligible for the NRHP. We also recommend that construction can begin at this location without further archaeological considerations."

Native American Burial Ground and related cultural resources

The Augusta County Historical Society has grave concerns about the ACP's proximity to this sacred burial area and potential village site along the Middle River in Churchville, Va. The Society notes that the survey team has failed to recognize and therefore has dismissed evidence that the project would be infringing on this area. The Society would like to have further investigation of this site and the surrounding area and potentially associated sites. Further, we would like to bring in Tribal Consultation for this site as it is a burial ground.

We have serious concerns over the proximity of the ACP APE to the burial mound/temple, village and town located along the Middle River near the village of Churchville. Apparently no one from ACP has surveyed the site, which has been surveyed and documented at least three times since the second half of the 20th century. Those instances are on record with VDHR and would be hard to miss.

A survey of 44AU0035 was generated on April 10, 2015, referencing a survey from 1997. That survey referenced the 1952 test strip in the mound that uncovered 129 pottery sherds, 17 chips, 44 points and blades, two drills, 2 pipes, and 1 celt. There were three burial groups discovered as well. (Holland in *BAE Bulletin* 173, 1960, Report *ASV Bulletin* "The East Mound", Meggers, vol 7, No 3, March 1953.)

In 1965, an extensive excavation occurred. During this investigation approximately 143 skeletons were removed although many more were so deteriorated that they could not be moved meaning that the ground remains a place where human remains are buried. There were many stone points, pipes, and pottery pieces removed as well. There were some shell beads, animal bones, and an eagle talon.

The results of the 1965 research point to a time period of between 960 A.D. to 1320 A.D. – an almost 300-year-period when the mound was in use. Archaeologists therefore described the mound as Late Woodland and noted that it was **probably in close proximity to a village or semi-permanent encampment**. It should be noted that Native American artifacts in the Churchville area are commonplace, particular around springs. (*Augusta Historical Bulletin*, 2015)

In the Summary of Archaeological Resources in the APE, for sites 44AU0919 and 44AU0920 the surveys note lithic scatter but declare the sites ineligible for the NRHP. Anyone checking the existing archaeological resources at VDHR could not help but notice the proximity especially of the second site with two existing documented sites related to the East Burial Mound. It makes sense that the test sites, especially 44AU0920, are part of a larger Late Woodland complex considering that it appears between two previously recorded VDHR sites. Further investigation into the connection between these sites is warranted.

Site 44AU0920, located on a slope above Middle River, produced 13 of 23 positive shovel tests that revealed 52 artifacts. The report notes that: "Site delineation suggests that the cultural remains may extend beyond the current Project survey corridor to the west. Although it is unlikely that significant remains would be present, the portion of the site beyond the survey corridor was not investigated, so a NRHP eligibility recommendation cannot be made for the site overall. However, that portion of the site in the APE lacks further research value, and would not contribute to the eligibility of the site as a whole. Therefore, the proposed construction through this portion of 44AU0920 would pose no adverse effect; ERM recommends no further work at the site."

The Augusta County Historical Society would like to dispute these recommendations and suggest that the site is culturally connected to the larger East Mound burial and village

complex that was inhabited for almost three centuries. Further, final reports from archaeologists in the 1960s suggest that less than half of the human remains were successfully removed from the site. **This site not only warrants further investigation, but it is a sacred burial ground that should not be disturbed and destroyed by the ACP. We would like to bring in Tribal Consultation for this site.** Information about the East Burial Mound and the surrounding area **are included as an attachment. (See pages 7-9 of Augusta County attachment)**

Tribal Consultation

Page 617 in the DEIS notes that the following tribal contacts were interested in more information about the ACP project: the Seneca Nation of Indians, the Catawba Indian Nation, the Delaware Tribe of Indians, the Eastern Shawnee Tribe of Oklahoma, the Tonawanda Band of Seneca, and the Tuscarora Nation. The Catawba Indian National responded with a letter stating that they have no immediate concerns regarding the projects, but would like to be notified if Native American artifacts or human remains are encountered during the ground disturbing phase of construction. “The Delaware National informed us that the project does not endanger cultural or religious sites known to them, and asked that their office be included as a contact in the event of an unanticipated discovery during construction.” The Eastern Band of Cherokee Indians filed a letter on the docket requesting maps and copies of the archaeological survey reports of the project areas. “Atlantic and DTI sent copies of all archaeological survey reports to the tribe. We will continue to consult with tribes who are interested in the projects and ensure they get the information they request.”

The Augusta County Historical Society would like confirmation that all documentation has been sent to those interested tribal contacts and that, further, copies of this report be sent to them as well.

Questioning time spent on visual architectural surveys

One has to wonder how much time was actually spent doing visual architectural surveys of the APE. Three glaring admissions within less than a mile serve as an example of why this statement is being made. In each of the Dovetail reports, the G.M. Cochran Mill (AU007-0917) and Cochran’s Church/Chapel (AU007-914) are mentioned. The mill is listed as being eligible for the NRHP. The church is listed as existing but as not having been evaluated. The problem is that neither resource is extant. The mill was dismantled in 2007. The chapel was taken down sometime in the late 20th century. If these buildings were not “missed” by the surveyors than obviously no one actually drove the route as both were once located within feet of the road. One must then wonder what else has been missed on the remaining 55 miles of the route. Also at this point the pipeline route crosses historic Rt. 11 (the Valley Pike, i.e. the Great Wagon Road) and the B&O Railroad bed. Although the mill and the chapel are gone, both should qualify and should have been red-flagged for at least Phase I archaeological surveys. There are also extensive mill races that remain for both the G.M. Cochran Mill and the mill that supplied the stone for the nearby Folly Mills bridge on U.S. Rt. 11. This mill race might be within the APE.

Cochran’s Chapel (007-914)

Immediately upon crossing U.S. Rt. 11, the route crosses a tiny tract of land that was once an early 20th century African-American chapel. How the cultural resource research team missed this is anyone’s guess as it has been listed in the DHR records for decades. Further, Dominion’s land team had to know about it to research the current owners of the site, which they have done. They obviously did not coordinate their information with the cultural resource team. A separate

report on this site is attached. This site should require a Phase I archaeological survey at the minimum. (See pages 10-12 of Augusta County attachment)

Stone Walls as cultural landscape markers

Historic Mortar-less Stone Walls

One of the most glaring omissions in the cultural resources report for Augusta County is the lack of identification by any of the contractor teams looking at cultural resources of the historic stone walls that will be destroyed on the last three parcels of land in eastern Augusta County. Hundreds of feet of these walls crisscross the property on Hazel Palmer as well as the adjoining properties of Monroe and Hanger. The bulk of the walls, however, lies on the Palmer property. These walls would be destroyed at numerous points both through the proposed route and the alternate route (if the HDD under the Blue Ridge Parkway and Appalachian Trail fails).

Although these walls now go through mostly wooded land, they were once part of a cleared landscape. Settlers on the western slopes of the Blue Ridge Mountains lived proud and independent lives on their subsistence farms. As their ancestors had done in the north of Ireland and in Scotland before that, they picked rock from the fields and built massive stone walls to protect their crops and gardens, to enclose their livestock -- mostly hogs and cattle -- and to delineate property lines. Built with a skill long lost, these stone walls are mortar-less -- held together by the skill of the builder. Horse-high and hog tight, these walls are often as wide as six feet and as high as a person's chest. They snake horizontally across the rising hills of the Blue Ridge and extend for miles. On the eastern portion of the county, ALL of the routes and alternate routes in Augusta County would cross and destroy these silent and powerful symbols of our pioneering ancestors who settled the Valley of Virginia. There is no mitigation that can restore what those artisans created centuries ago.

The designers of the Blue Ridge Parkway recognized the significance of these walls and integrated stone walls along the parkway's length in order to reflect the Appalachian culture through which the scenic byway wound. Some of the historic stone walls can be seen along the road and snaking through the forest along the Blue Ridge Parkway in the Augusta County-Nelson County portion of the drive.

The most extensive and intact series of walls remain on Hazel Palmer's property. Her ancestors bought the property almost 140 years ago and the walls were there at that time. "...I am the fourth generation to own this property. It was the home place of my maternal great-grandparents, who purchased the property in 1880, grandparents, parents, myself, and now my daughter who is fifth generation. My family has taken care of the property with great pride," said Palmer.

The walls are cultural indicators that remain from the Ulster Scots who settled the land in the late eighteenth and early nineteenth centuries. Local folklorist and author Lynn Coffey, who has extensively documented the mountain culture of the Augusta County-Nelson County-Amherst County geographic area, notes that the stone walls found on numerous properties in the area are part of the heritage, creating a unique cultural attachment to place and space. She writes:

"The stone walls found throughout the mountains are part of the early landscape built by people who settled in the Blue Ridge in the eighteenth and nineteenth centuries. As they began clearing the land for farming they found an abundance of native rock, which they used to their benefit. The rocks were gathered and piled into stone walls, which were a convenient and aesthetic way in which to dispose of them plus the walls could be used to mark boundary lines or keep livestock inside a barrier.

“These stone walls are abundant in our area, whether located on the property of those still living here or on the home places of long-abandoned farms. They stand as a silent sentinel to the hard working Appalachian people who first settled here and are part of history that cannot be replicated, and thus should be protected from the onslaught of progress whenever possible.

“People who have these early stone walls on their property are careful not to disturb them and have an attachment that runs deep because of their unique history. Our own mountain land has been in the same family for eight generations and looking at the stone walls, one can only marvel at the back-breaking work that must have gone into building them.”

Professor Audrey Horning, at Queen’s University Belfast, specializes in the relationships between archaeology and contemporary identity with a particular focus upon European expansion into the early modern Atlantic worlds. Dr. Horning agrees that the stone walls of eastern Augusta County are “culturally meaningful aspects of heritage” and adds that the styles, in her opinion, can often be attributed to particular kin groups. More research would have to be done to find direct Ulster connections; further making the argument that these walls should be *totally avoided* if the pipeline route becomes reality. (See pages 13-15 of Augusta County attachment)

Other Stone Walls

The fact that the cultural resources survey teams failed to identify hundreds of feet of these stone walls on three properties is inexcusable, especially in light of their own archaeological report from nearby Augusta County property 44AU0860. That survey, included in the Phase I Archaeological Report, has the remains of an old homestead and a series of stone walls that are far more weathered than those on Hazel Palmer’s property. The NRG report notes:

“The date and function of the stone walls is unknown. However, the association of the five stone walls with the architectural remains at the site suggests an historic origin as well...Further research is needed to provide context for the features observed at **44AU0860**, and to facilitate evaluation according to the NRHP eligibility criteria. **NRG recommends avoidance of the site pending further documentary and archaeological investigation.**” **No further documentation about this site from Dominion’s cultural resource teams has been found.**

The Augusta County Historical Society would also like to draw the attention to another site containing these mortar-less stone walls in the vicinity, **site 44AU0878, that was dismissed by NRG but re-evaluated by the Virginia Department of Historic Resources. The recommendations made by VDHR do not appear to have been acted upon.**

The site **44AU0878** had been surveyed by Jena Whipking of NRG on 11/6/2015 and “Recommended Not Eligible.” The site had three positive shovel tests with historic artifacts out of 6 and an observation of the “Historic stone surface features” was made.

Despite the recommendation in the Phase I survey of not being eligible, the landowner apparently showed the site to DHR representative Bob Jolley on 3/9/2016. His conclusion was that the rock walls constructed on opposite sides of an intermittent stream that run for over 500 feet might have been used to impound water. “This is an unusual site plan for a domestic historic site, one not previously seen by this investigator before,” he wrote. **“If the area is to be impacted, additional site survey is recommended including a site plan and excavation of test units in and adjacent to the foundation of the historic structure. Recommended for further survey,”** he concluded.

Despite the fact that Jolley’s recommendation for further survey and potential construction avoidance occurred over a year ago, no evidence of a Phase II investigation has been seen and no alteration of the route has apparently occurred.

If, indeed, avoidance of these two sites is recommended, why would avoidance of the Hazel Palmer site with more stone walls, in better shape, and better documentation, not also be recommended for avoidance? Could it be because the Palmer site is the staging area for the HDD drilling? Would that be why the walls on the Palmer property and the adjoining properties are not even documented by the cultural resources teams? Interestingly enough, Dominion's engineering drawings do show the rock walls so the company is aware of the resource being impacted. (See **attachment.**) The Augusta County Historical Society is currently working with an anthropology student from James Madison University to map the walls on the Palmer property.

The Society insists that these walls as well as any others that occur in the path of the pipeline are unique cultural resources associated with the early Ulster Scots settlers (also called Scotch-Irish) to this geographic region of the Shenandoah Valley. As such any damage cannot be mitigated. All activity associated with the pipeline, including the proposed pipeline route as well as associated construction, access roads, blasting, and ground vibration should be moved around the walls now known to occur on at least five Augusta County properties: the Palmer property, Monroe Property, Hanger property, 44AU0878 and 44AU0860. Further, we request that additional surveys on nearby properties be conducted to identify whether or not similar walls occur on other properties within the APE. It is recommended that similar surveys occur on the other side of the mountain in Nelson County.

Shenandoah Valley Battlefields National Historic District

Finally, the Augusta County Historical Society needs to bring to FERC's attention the impact that the ACP will have on the Civil War Resources in Augusta County. The county is part of the Shenandoah Valley Battlefields National Historic District and as such has numerous Civil War period resources that need to be documented in conjunction with possible effects from the ACP. The McDowell Battlefield Corridor is one such resource that will be crossed by the pipeline. The route of Hunter's 1864 Campaign will also be crossed by the pipeline route in at least three locations: along the Middlebrook-Brownsburg Turnpike, along U.S. Rt. 11, and along Mt. Torry Road. There could be other Civil War resources that are impacted as well. With the exception of a brief mention of the McDowell Battlefield, none of these potential impacts are even mentioned in the DEIS.

The Shenandoah Valley Battlefields Foundation plans to file documentation about this missing information as well.

Property Information**Property Names**

Name Explanation	Name
Function/Location	Farm, 3029 Stuarts Draft Highway
Historic	Jonathan Harper House
Historic/Current	George Harper Farm
Historic/Current	Harper House

Property Evaluation Status

NRHP Listing
VLR Listing

Property Addresses

Current - 3029 Stuarts Draft Highway Route 340

County/Independent City(s):	Augusta (County)
Incorporated Town(s):	Stuarts Draft
Zip Code(s):	24477
Magisterial District(s):	<i>No Data</i>
Tax Parcel(s):	<i>No Data</i>
USGS Quad(s):	STUARTS DRAFT

Additional Property Information

Architecture Setting: Rural

Acreage: 1.3

Site Description:

1981 survey: The farm is noteworthy for its fine selection of outbuildings, all conveniently clustered around the back porch of the main house.

2005 PIF: Unusually intact 19th century 151.81 acre farm site east of Stuarts Draft with a vernacular brick Virginia I-house with a rear saddlebag ell, along with period outbuildings, fields, and orchard. There are several outbuildings dating to the late 19th and early 20th centuries including a granary, salt curing/smokehouse, shed, silo, metal windmill, and a kitchen/dairy that may have been used as a dwelling prior to the main brick structure. The site originally included a barn, chicken house, rabbit house, farrowing barns, a log cabin dwelling house, a bunk/tenant house, and the original post office for the town of Stuarts Draft, now all demolished.

2005 nomination: In the yard are two small concrete fish ponds of oblong form. The property is surrounded by farmland with scattered historic and modern houses and farms and views of the Blue Ridge Mountains to the south and east. Nominated parcel is approximately 1.25 acres. The house retains several historic domestic outbuildings including a workshop and a large meathouse, and also a large mortise-and-tenon frame granary, the principal survivor from the farm complex once associated with the house.

March 2015: There have been no changes since the previous survey.

Surveyor Assessment:

1981 survey: The Hotchkiss Atlas indicates that this was the home of Jonathan Harper in 1885. Local residents remember this as the George Harper farm. When he died five years ago, the property passed to his daughter, Dorothy Eckhart.

2005 PIF: William Harper acquired land in Augusta County around 1800. His son, Joseph Harper, owned the land association with the Harper House by 1850 (Deed Books, August County, Virginia). After Joseph's death in 1860, the farm was left to his widow and brothers. Probate reported that the farm included 441 acres on the road from Waynesboro to Greenville on both sides of the South River (Will Book 40, page 37). Family tradition recalls that this included the draft of Stuarts Draft, as well as the original post office for the town.

Following the Civil War, Joseph's nephew John J. Harper and his wife, Sarah, moved to the farm from West Virginia. Family tradition maintains that it was John Harper who built the brick house. The house was constructed from bricks made from clay dug on the site. Historical Atlas of Augusta County, VA, 1885, by Jedediah Hotchkiss indicates that this was the home of Jno. Harper in 1885. John was referenced as one of the "principal farmers" of Stuarts Draft in Chataigne's Augusta County, Virginia Gazetteer and Classified Business Directory for 1888. His self-sufficient farm produced wheat, corn, apples, cattle, milk cows, and hogs.

John Harper died in 1890, leaving most of the farm and the house as a life-right to his wife. The house and farm transferred to their son, George Alexander Harper, around 1905. He was living in the house with his wife, Carmen Hicks, by 1909. It is believed that Carmen gave the house the moniker "Maple Shade" after the line of large maple trees along the front of the house (removed by highway expansion in the 1980s). Certainly, the family called their residence Maple Shade during the 20th century. George Harper was Chairman and member of the school board for thirty-five years, noteworthy as leader and education reformer who transitioned the school system from one-room schools to modern facilities, introduced school buses, and developed the Woodrow Wilson Education Center. As one of the leading forces in the evolution of the County's educational system and school architecture during the early 20th century, George Harper is associated with the Virginia Department of Historic Resources' 1984 thematic nomination "Public Schools in Augusta County, Virginia, 1870 to 1940 (McCleary, Ann. "Augusta County Schools Selected for State's First Thematic Nomination," Notes on Virginia 26, Spring 1985, p. 28-33) Because George occupied the house and farmed the land until his death in 1964, local residents remember this property as the George Harper farm. Today, the farm is owned by Harper's grandchildren, Mary Louisa Urquhart Bryant and Charles Fox Urquhart III.

2005 nomination: The Harper House is a well preserved Italianate dwelling located near Stuarts Draft in Augusta County, Virginia.

Tax records suggest the two-story brick house was built ca. 1888 for farmer John J. Harper, his wife Sarah, and the couple's family. The salient exterior feature is a richly ornamented front porch with sawn and pierced woodwork that appears to be modeled on cast iron porch details of the era. On the interior are Greek Revival mantels and a stair newel carved with a star design. The house is accompanied by a complement of domestic outbuildings including a large meathouse and a building that may have served as a summer kitchen, laundry, and dwelling in addition to its later function as a workshop. A large mortise-and-tenon granary features a threshing floor flanked by grain bins and a slatted corncrib. The Harper House passed to George and Carmen Harper in the early twentieth century. George Harper was an educational reformer who helped modernize Augusta County schools during the first half of the twentieth century. The Harper House now belongs to Harper family descendants who are considering rehabilitation approaches to the property.

Applicable Criteria

The Harper House is eligible for listing in the National Register of Historic Places under Criterion C in the area of Architecture as a well preserved and finely finished Italianate dwelling with a number of notable architectural features, and also for the survival of the major part of its historic domestic outbuilding complex. Prior to the current documentation, the property was visited twice by architectural historians associated with the Virginia State Historic Preservation Office, and both wrote approvingly of the property. Dell Upton wrote in 1974, "This is perhaps the finest nineteenth century house along this part of the highway. It has the distinction of combining a handsome house with a varied and well preserved collection of outbuildings." Ann McCleary surveyed the property in 1981 and commented, "The farm is also noteworthy for its fine selection of outbuildings, all conveniently clustered around the back porch." The period of significance extends from ca. 1870, a date that reflects the possibility that some of the outbuildings pre-date the main house, until ca. 1940, embracing later developments such as additions to the house. The Harper House is eligible at the local level of significance.

The Jonathon Harper House located at 3029 Stuarts Draft Highway was listed on the NRHP in 2005. The two-story, three-bay, Italianate, I-house was built circa 1888 of five-course American common bond with a Flemish-bond variant. Outbuildings include a granary, windmill, garage, kitchen, and meat house. Dovetail recommends that the Jonathon Harper house maintain its NRHP-listed status.

Surveyor Recommendation: Recommended Eligible

Ownership

Ownership Category	Ownership Entity
Private	No Data

Primary Resource Information

Resource Category:	Domestic
Resource Type:	Single Dwelling
Date of Construction:	1888Ca
Historic Time Period:	Reconstruction and Growth (1866 - 1916)
Historic Context(s):	Architecture/Landscape, Domestic, Subsistence/Agriculture
Architectural Style:	Italianate
Form:	I-House
Number of Stories:	2.0
Condition:	Fair
Interior Plan:	Central Passage, Single Pile
Threats to Resource:	Erosion, Public Utility Expansion, Transportation Expansion

Architectural Description:

Architecture Summary, 1981: The Harper House is typical of late 19th century brick farmhouses in the Stuarts Draft area. Many were built during these years south and east of Stuarts Draft, suggesting its continued prosperity at this time. Bracketed cornice.

2005 PIF: A survey conducted by D.T. Upton for the Virginia Landmarks Commission in 1974 reports, "This is perhaps the finest nineteenth century house along this part of the highway. It has the distinction of combining a handsome house with a varied and well preserved collection of outbuildings."

A survey conducted by Ann McCleary for the Virginia Historic Landmarks Commission in 1981 reports, "The Harper House is typical of late 19th century brick farmhouses in the Stuarts Draft area. Many were built during these years south and east of Stuarts Draft, suggesting its continued prosperity at this time. The three-bay façade I-house plan, the use of five-course American bond with Flemish variant, the interior chimneys, hip roof, and bracketed cornice were popular late 19th century characteristics in this area."

The house has numerous Italianate characteristics, including paired cornice brackets, 2 over 2 windows, a hipped roof, and a four-panel front door with transom, sidelights, and corner lights. The windows and four-panel doors throughout the structure appear to be original and retain their original period hardware, including porcelain doorknobs and decorative cast hinges. The front porch features sawn work pillars and railings, the design appears to be a local craftsman's interpretation of wrought iron. This feature, along with complimentary detailing on the paired brackets and corner lights, adds to the attractive and distinctive appearance of this house.

There is a two-story brick saddlebag ell on the south (rear) I-house which has a basement/root cellar and identical windows, paired brackets, shutters, doors, molding, and mantle. Historically, the ell had a two-tiered porch to the west which featured woodwork that matched the front porch (photo documentation and family recollection). The ell was probably built at the same time as the I-house, but may also be an older section that was remodeled during the construction of the main house. The two-tiered porch was replaced by a single-tiered metal porch in the mid-to-late 1960s following a storm, marking the only loss of exterior period features. A two-story brick room was added off the ell to the east at some point. This addition also features matching windows, paired brackets, and doors and, therefore, probably dates closely to the original construction—only a minor variation in brickwork around the windows and doors indicates a different construction phase during the initial

inspection. In addition, a two-story brick bathroom wing was added by 1920 off the east I-house end and includes the only 20th century windows in this house, 1 over 1 and 9 over 1. There is also a wooden porch off the east side of the ell that is enclosed. The interior plaster coated walls are approximately 12 inches thick, with variations between interior and exterior walls. The interior includes original pine floors, Greek Revival mantels, wide plank skirting, period moldings around doors and windows, and built-in cupboards adjoining the kitchen/dining room fireplace and the front room fireplace. The original main staircase survives and features a carved star on the newel post and wooden paneling between the trend-end and the floor.

2005 nomination: The Harper House is constructed of brick laid in Flemish variant 4:1 and 5:1 American bond. Pencilwork survives on many mortar joints. The mid-twentieth century bathroom wing on the east end of the front part of the house is constructed of random American bond and has a partial (or partially visible) concrete foundation. The two brick chimneys that rise from the interior of the front section and the one that rises from the interior of the ell have corbelled caps. The wood cornice at the top of the walls has paired sawn brackets and unusual channeling or linear indentations on the soffits. The front section, the ell, and the early two-story enlargement on the east side of the ell all have the same bracket and soffit details; the bathroom wing has a plain wood cornice and soffit.

The principal decorative feature of the house is the front porch, which has supports constructed of scantling with gaps between the members creating a vertically striped effect. At the top of the supports are molded caps and sawn brackets and between them are sawn balustrades with a stylized vaseiform repeat. The cornice of the hip porch roof has small paired brackets aligned with the supports. The porch also has a beaded tongue-and-groove ceiling, a wood floor, and brick footers. The porch shelters the centered front entry, which has a transom and sidelights, heavy carved brackets between the sections of the transom, and a four-panel door. The house has two other porches. The one-story porch that extends along the west side of the ell has a shed roof, square posts, a metal railing, a plywood ceiling, and cinder block footers. It replaces a two-story porch at the same location. (The bottom tier of this former porch, which was destroyed in a storm in the late twentieth century, had cornice brackets similar to ones elsewhere on the house.) On the east side of the ell is a smaller one-story porch with a W-pattern lattice railing and a weatherboarded pantry enclosure. This porch may be a reduction of the original porch on this side of the ell, which would have been mostly removed when the ell addition was made. Key stains on the presently exposed studs inside the pantry indicate a former plaster-and-lath finish, although it is possible the studs were reused from another context. The weatherboards are attached with wire nails suggesting the pantry was created about 1900 or the early decades of the twentieth century. Adjacent to this porch is a concrete platform that covers a cistern that is no longer in use.

The windows in the original section of the house and the early ell addition are two-over-two sash, those on the front section with louvered shutters. The bathroom wing has nine-over-nine windows and there are small four-light windows in the pantry and on the west side of the ell basement under the porch. The basement windows are in front of iron rod barred vents. The second-story front elevation window is flanked by narrow one-over-one sashes, reflecting the three-part form of the entry and sidelights below. The entries on the west side of the ell have four-panel doors with the upper panels glazed.

House Interior

Typical interior finishes include plaster walls and ceilings, wood floors, simply molded baseboards, and four-panel doors with porcelain knobs and decorative butt hinges. The doors (as well as most other woodwork) have light-colored modern paint, although at least one door shows earlier dark brown paint where the modern paint has chipped. The original door and window openings have molded surrounds, the molding profiles different on the first and second floors, and the openings are slightly splayed where they pass through exterior walls. The front entry surround is crosssetted. The principal stair is located in the center passage and has one run with a complex modified landing or partial run at the top. The newel at the foot of the stair and the ovoid-section hand rail appear to be walnut, the risers are walnut stained, and the other stair elements are painted. The newel has a heavy turned form and is capped by a relief carving of a five-pointed star. The balusters are turned, the spandrel is finished with panels that grow successively taller as the stair rises, and the closet under the stair was refinished in the twentieth century. The landing at the top of the stair provides access to the second-floor center passage, the main room on the second floor of the ell, and a short hallway created to provide access to the bathroom wing.

The late Greek Revival post-and-lintel mantels are very similar in form throughout the house but have subtle variations. The mantels, six in all, have narrow pilasters with molded caps and bases and slightly projecting panels on their faces. The pilasters perch on decorative base blocks that have shoulders with angular, convexly curved, or concavely curved profiles. The mantel shelves have varied corner treatments, with convex or concave curves in three or more profiles. The mantels in the two front second-floor rooms are smaller than the mantels in the rooms below. Some hearths have been replaced with wood floor boards; the hearth in the main second-floor ell room is concrete scored to simulate brick and painted dark gray. Next to the mantel in the first-floor east front room is a press with paneled doors with decorative latches and partly removed shelves. The floor boards at the center of this room are unpainted, indication of an original carpet or mat floor covering. The floors of the second-floor west front room and the second-floor ell addition also have unpainted center areas of square or rectangular form.

The present kitchen at the south end of the first floor of the ell probably occupies the location of an original kitchen. The kitchen may once have had a mantel like others in the house. The kitchen has a corner winder stair, mostly enclosed, that leads to the room above and also, formerly, to the basement. Access to the stair is through a batten door with a simple lift latch. The kitchen has ca. 1970s cabinets and paneling; similar paneling covers the walls of the second-floor east front room. The first-floor room in the ell addition, known to the Harper family as the "office," has a brick stove flue that begins two or three feet above the floor. Wrapping around the flue at about four feet above the floor is a shelf with convex curved corners supported on carved brackets. The outer wall of the room is lined with book cases. Other interior features include several second-floor closets with decorative wire clothes hooks, remnants of conventional floral or other pattern twentieth century wallpaper in some second-floor spaces, and doorways cut into the southeast corner of the first-floor front west room to provide access to the rear of the center passage and the ell.

The basement extends only under the ell and ell addition. It is entered by steps from the exterior at the south end—a gabled bulkhead formerly covered the steps—and through a batten door painted red and secured by a wrought iron hook. The two basement rooms under the ell have parged walls, dirt floors, and cut-nailed cross bracing between the ceiling joists. Next to the chimney breast in the north room is a crude built-in cabinet. It is unclear whether there were functional fireplaces in the two rooms. The space under the ell addition, which has white-painted brick walls, was used for processing milk during the early twentieth century. The ceiling joists in this space are smaller in section than those in the rest of the basement.

March 2015: There have been no changes since the previous survey.

Exterior Components

Component	Component Type	Material	Material Treatment
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Roof	Hipped	Metal	Standing Seam
Windows	Sash, Double-Hung	Wood	2/2
Structural System and Exterior Treatment	Masonry	Brick	Other
Chimneys	Interior	Brick	<i>No Data</i>
Porch	1-story, 4-bay	Wood	<i>No Data</i>
Porch	1-story, 3-bay	Wood	<i>No Data</i>
Windows	Sash, Double-Hung	Wood	6/1
<i>No Data</i>	<i>No Data</i>	Stone	<i>No Data</i>

Secondary Resource Information

Secondary Resource #1

Resource Category: Agriculture/Subsistence
Resource Type: Granary
Architectural Style: No Discernable Style
Form: Rectangular
Date of Construction: 1890
Condition: Poor
Threats to Resource: Deterioration, Public Utility Expansion

Architectural Description:

March 2005: The granary's core is hewn framing members that are mortise and tenoned and pegged together and covered with pine boards that are approximately one foot wide. The hewn framing may date to the antebellum era.

Late 19th century contributing building.

March 2015: There have been no changes since the previous survey.

Number of Stories: 1

Secondary Resource #2

Resource Category: DSS Legacy
Resource Type: Shed
Architectural Style: *No Data*
Form: *No Data*
Date of Construction: *No Data*
Condition: Demolished
Threats to Resource: Demolition, Deterioration, Public Utility Expansion

Architectural Description:

In poor condition at time of original recordation. Not included in 2005 nomination, so likely demolished.

March 2015: This resources has been demolished.

Number of Stories: 1

Secondary Resource #3

Resource Category: Agriculture/Subsistence
Resource Type: Chicken House/Poultry House
Architectural Style: *No Data*
Form: *No Data*
Date of Construction: *No Data*
Condition: Demolished
Threats to Resource: Demolition, Public Utility Expansion

Architectural Description:

March 2015: This resources has been demolished.

Number of Stories: *No Data*

Secondary Resource #4

Resource Category: Agriculture/Subsistence
Resource Type: Windmill
Architectural Style: No Discernable Style
Form: *No Data*
Date of Construction: 1900
Condition: Poor
Threats to Resource: Deterioration, Public Utility Expansion

Architectural Description:

Early 20th century contributing resource.

 March 2005

March 2015: There have been no changes since the previous survey.

Secondary Resource #5

Resource Category: Domestic
Resource Type: Garage
Architectural Style: No Discernable Style
Form: Rectangular
Date of Construction: 1940
Condition: Ruinous
Threats to Resource: None Known, Public Utility Expansion

Architectural Description:

1st half of 20th century, contributing building.

 March 2005

March 2015: There have been no changes since the previous survey.

Number of Stories: 1

Secondary Resource #6

Resource Category: Domestic
Resource Type: Kitchen
Architectural Style: No Discernable Style
Form: Rectangular
Date of Construction: 1890
Condition: Poor
Threats to Resource: Deterioration, Public Utility Expansion

Architectural Description:

March 2005: The kitchen has an exterior brick chimney and stone foundation. It consists of two rooms, a loft, and a basement dairy. Family tradition maintains that this structure, which was called the "workshop" during the 20th century, once served as a family residence.

Late 19th century contributing resource under Workshop designation.

March 2015: There have been no changes since the previous survey.

Number of Stories: 1

Secondary Resource #7

Resource Category: Agriculture/Subsistence
Resource Type: Smoke/Meat House
Architectural Style: No Discernable Style
Form: Rectangular
Date of Construction: 1890
Condition: Poor
Threats to Resource: Deterioration, Public Utility Expansion

Architectural Description:

March 2005: The salt curing/smokehouse has partial brick noggin up to about chest height, as well as plates and corner posts that are pegged

together.

Late 19th century contributing resource.

March 2015: There have been no changes since the previous survey.

Number of Stories: 1

Historic District Information

Historic District Name: *No Data*

Local Historic District Name: *No Data*

Historic District Significance: *No Data*

CRM Events

Event Type: Survey:Phase I/Reconnaissance

Project Review File Number: 2014-0710
Investigator: Stephanie Jacobs
Organization/Company: Dovetail CRG
Sponsoring Organization: *No Data*
Survey Date: 2/2/2015
Dhr Library Report Number: VA-119

Project Staff/Notes:

Adriana T. Lesiuk, Stephanie A.T. Jacobs, Michelle Salvato, M. Chris Manning, Caitlin Oshida, Emily K. Anderson
 Architectural Survey for the Dominion Atlantic Coast Pipeline in Highland, Augusta, Nelson, Buckingham, Cumberland, Prince Edward,
 Nottoway, Dinwiddie, Brunswick, Greensville, Southampton Counties and the Cities of Suffolk and Chesapeake, Virginia
 Dovetail Cultural Resources Group, Sept 2015
 VA-119
 2014-0710

Event Type: NRHP Listing

DHR ID: 007-0233
Staff Name: NPS
Event Date: 2/1/2006
Staff Comment

No Data

Event Type: VLR Listing

DHR ID: 007-0233
Staff Name: DHR
Event Date: 12/7/2005
Staff Comment

No Data

Event Type: NRHP Nomination

DHR ID: 007-0233
Staff Name: Pezzoni, J. Daniel
Event Date: 9/22/2005
Staff Comment

No Data

Event Type: DHR Board Det. Eligible

DHR ID: 007-0233

Staff Name: State Review Board**Event Date:** 6/1/2005**Staff Comment**

Grasslands, Loudoun County, #053-0472 (Criteria A and C) and Harper House, Augusta County, #007-0233 (Criteria A and C)

Board Comment: Board member Barbara Heath made a brief recommendation that for both of the above properties: archaeology significance should be considered during the research phase of the nomination work. She felt that the information in the PIFs indicated potential for Criterion D or notation that an archaeological component of the property should be highlighted for further/future research.

Event Type: DHR Staff: Eligible**DHR ID:** 007-0233**Staff Name:** DHR**Event Date:** 4/7/2005**Staff Comment**Virginia Department Of Historic Resources-Richmond
National Register Evaluation Committee
April 7th, 2005

Wagner Presenting:

Harper House, Augusta County, DHR File Number 007-0233

The resource is an evolved 2 story, masonry, Italianate style farmhouse, c. 1871 and later, with several early (contemporary with house) outbuildings, some relating to agricultural use. The period of significance is 1871, considered under Criteria A (History-Agriculture) and C (Architecture). There is possibility of Criterion B for locally important education leader George Alexander Harper (long time farmer and resident on the property). The committee recommends eligible with a score of 35 points.

Event Type: PIF**Project Review File Number:** *No Data***Investigator:** Bryant, Mary Louisa U.**Organization/Company:** Unknown (DSS)**Sponsoring Organization:** *No Data***Survey Date:** 3/31/2005**Dhr Library Report Number:** *No Data***Project Staff/Notes:**

"We are concerned about the future of this family farm and believe that increased awareness resulting from this recognition, as well as the option of rehabilitation tax credits and preservation easements, would help ensure its preservation."

Event Type: Survey:Phase II/Intensive**Project Review File Number:** *No Data***Investigator:** McCleary, Ann**Organization/Company:** Unknown (DSS)**Sponsoring Organization:** *No Data***Survey Date:** 11/1/1981**Dhr Library Report Number:** *No Data***Project Staff/Notes:**

VHLC survey - originally recorded under DHR file number of 007-0901.

Event Type: Survey:Phase II/Intensive**Project Review File Number:** *No Data***Investigator:** Upton, D.T.**Organization/Company:** Unknown (DSS)**Sponsoring Organization:** *No Data***Survey Date:** 11/6/1974**Dhr Library Report Number:** *No Data***Project Staff/Notes:**

VHLC survey

Bibliographic Information

Bibliography:

No Data

Property Notes:

Name: Charles F. Urquhart III
Address 1: 26026 Court Street
City: Courtland
State: Virginia
ZIP: 23837

Surveyor Notes: co-owner at time of 2005 PIF
Owner Relationship: Owner of property

Name: Mary Louisa U. Bryant
Address 1: 504 Francisca Lane
City: Cary
State: North Carolina
ZIP: 27511

Phone 1: 919-467-6876
Ext: 0000

Surveyor Notes: co-owner at time of PIF, 2005
Owner Relationship: Informant, Owner of property

Project Bibliographic Information:

No Data

**Comparison of two archaeology reports:
one on private land and one on National Forest land
Site on Private land**

Virginia Department of Historic Resources
Archaeological Site Record



Snapshot

Date Generated: December 12, 2016

Site Name: No Data
 Site Classification: Terrestrial, open air
 Year(s): No Data
 Site Type(s): Lithic scatter
 Other DHR ID: No Data
 Temporary Designation:

Site Evaluation Status

Not Evaluated

Locational Information

USGS Quad: DEERFIELD
 County/Independent City: Augusta (County)
 Physiographic Province: Valley and Ridge
 Elevation: 1800
 Aspect: No Data
 Drainage: James
 Slope: 2 - 6
 Acreage: 1.100
 Landform: Other
 Ownership Status: Private
 Government Entity Name: No Data

Site Components

Component 1

Category: Industry/Processing/Extraction
 Site Type: Lithic scatter
 Cultural Affiliation: Native American
 DHR Time Period: Pre-Contact
 Start Year: No Data
 End Year: No Data
 Comments: No Data

Bibliographic Information

Bibliography:

No Data

Informant Data:

No Data

Virginia Department of Historic Resources
Archaeological Site Record

CRM Events

Event Type: Survey:Phase I

Project Staff/Notes:

No Data

Project Review File Number:

No Data

Sponsoring Organization:

No Data

Organization/Company:

Natural Resource Group, LLC

Investigator:

Jena Whipking

Survey Date:

5/10/2016

Survey Description:

Phase I Survey

Current Land Use

Agricultural field

Date of Use

5/19/2016 12:00:00 AM

Comments

No Data

Threats to Resource:

Erosion, Other

Site Conditions:

Site Totally Destroyed

Survey Strategies:

Subsurface Testing, Surface Testing

Specimens Collected:

Yes

Specimens Observed, Not Collected:

No

Artifacts Summary and Diagnostics:

Debitage and FCR

Summary of Specimens Observed, Not Collected:

No Data

Current Curation Repository:

ERM Atlanta (Duluth) Office

Permanent Curation Repository:

Return to Landowner

Field Notes:

Yes

Field Notes Repository:

ERM Atlanta (Duluth) Office

Photographic Media:

Digital

Survey Reports:

Yes

Survey Report Information:

Phase I Archaeological Survey of the Atlantic Coast Pipeline Project, Virginia Project Components

Survey Report Repository:

ERM Atlanta (Duluth) Office

DHR Library Reference Number:

No Data

Significance Statement:

Low artifact density; site destroyed; 12 positive shovel tests out of 38 total

Surveyor's Eligibility Recommendations:

Recommended Not Eligible

Surveyor's NR Criteria Recommendations, :

No Data

Surveyor's NR Criteria Considerations:

No Data

Archaeological site data is protected under the Archaeological Resource Protection Act (ARPA 1979).

Site on Forest Service land

CRM Events

Event Type: Survey:Phase I

Project Staff/Notes:

Jonathan Glenn; William Caramana; JT Sutton; Scott Gajewski; Samuel Williams; Christine Lasser; Corry Laughlin.

GAI's portion is only on George Washington National Forest land.

Project Review File Number:

No Data

Sponsoring Organization:

GAI Consultants, Inc.

Organization/Company:

Investigator:

Jonathan Glenn, M.A., RPA

Survey Date:

4/27/2016

Survey Description:

The impetus for this survey was FERC permitting for a natural gas pipeline. GAI's portion is only on George Washington National Forest land. The direct APE along the pipeline ROW consists of a 91.4-meter (m) [300 foot (ft)] corridor (see Figure 2) centered on the proposed pipeline. The direct APE for access roads consists of a 15.2 m (50-ft) corridor centered on the proposed/existing roadways. An APE wider than the proposed limit of disturbance (LOD) was studied for both the pipeline and access roads to allow flexibility in final design.

Subsurface investigation consisted of systematic excavation of shovel test pits (STPs) within testable areas of the APE. GAI archaeologists used a compass, tape, and measured pacing to establish a regular testing pattern within the APE. STPs were generally placed at 15.0 m (49.2 ft) intervals along transects spaced 15.0 m (49.2 ft) apart. Shovel testing within the APE included a maximum of six transects along the proposed pipeline and a maximum of two transects along the access roads (one transect along each side of the road), where deemed testable.

Each shovel test measured 50 cm (19.69 in) in diameter and was hand-excavated by natural soil horizons to at least 10 cm (3.9 in) into culturally sterile subsoil or to bedrock. Excavated soils were screened through 0.6 millimeter (mm) (0.25-in) hardware cloth for systematic artifact recovery. In the event that a single shovel test yielded artifacts, close interval radial STPs were generally excavated at 3 m (9.8 ft) intervals to determine if the discovery was an isolated find. If multiple adjacent or nearby initial STPs yielded artifacts and defined a site, then radial STPs were excavated at 5-m (16.40-ft) intervals to further investigate the locality. In the case of multiple initial positive STPs, radial STPs were generally focused around the perimeter of the cluster of initial positive STPs in order to refine the site boundary.

To date, GAI recorded six newly-identified sites and six isolated artifact finds, re-identified two previously recorded sites, and was unable to re-identify two other previously recorded sites.

Current Land Use	Date of Use	Comments
Forest	8/5/2016 12:00:00 AM	No Data
Threats to Resource:		Public Utility Expansion
Site Conditions:		No Surface Deposits but With Subsurface Integrity
Survey Strategies:		Subsurface Testing
Specimens Collected:		Yes
Specimens Observed, Not Collected:		No

Artifacts Summary and Diagnostics:

Of the 1,299 artifacts in the assemblage, 3 flakes were found in the upper few centimeters (cm) of the B horizon while the remaining 99.77 percent (n=1,296) of the artifacts occurred within the O/A horizon. Phase I shovel test artifact density ranged from one to 188 artifacts per STP. The peak artifact density (47 to 183 artifacts per STP) occurs in the northern third and along the western edge of the site (STPs D-4, E3, F8, F5, F10, R18, R32, and R37). Relatively moderate densities (14-41 artifacts) also occur across the western half of the site.

The Phase I artifact assemblage consists of six bifaces, eight unifaces, two cores and 1,283 debitage. The majority (>99 percent) of the lithic assemblage is comprised of quartzite, while quartz, gray chert, and gray grainy metamorphic material all combined constitute less than one percent. Evidence suggestive of thermal alteration was noted on 19 flake fragments, one utilized flake (uniface), and one biface.

The bifaces, all made from quartzite, include three middle-stage, two late-stage, and one fragment too small to determine the stage of reduction (Photograph 9). The uniface tools, also all made from quartzite, include six utilized flakes, one retouched flakes, and one notched flake. Such expedient tools were typically used for the scraping or cutting of wood, hides and other soft materials. Both core fragments are freehand cores made from quartzite.

The debitage sample is almost exclusively (99.5 percent; n=1,277) made from quartzite material. It consists overwhelmingly of biface reduction flakes (39 percent; n=506) and non-diagnostic flake fragments (59 percent; n=762). Early reduction flakes account for only one percent (n=15) of the collected debitage.

Summary of Specimens Observed, Not Collected:

No Data

Current Curation Repository:	GAI Consultants, Inc.
Permanent Curation Repository:	George Washington National Forest
Field Notes:	Yes
Field Notes Repository:	George Washington National Forest
Photographic Media:	Digital
Survey Reports:	Yes

Survey Report Information:

Glenn, Jonathan, Williams Caramana, Samuel Williams. 2016. Technical Report, Phase I Cultural Resources Investigation, Atlantic Coast Pipeline

Project, George Washington National Forest, Augusta, Bath, and Highland Counties, Virginia. Prepared by GAI Consultants, Inc., Homestead, Pennsylvania, for Dominion Transmission, Inc. and Atlantic Coast Pipeline, LLC.	
Survey Report Repository:	George Washington National Forest; VDHR; FERC
DHR Library Reference Number:	No Data
Significance Statement:	<p>GWNF Site 6 consists of a large prehistoric lithic scatter measuring approximately 10,013 sq m (107,790 sq ft). An unnamed tributary to Back Creek meanders through the site, flowing in a generally southwesterly direction. A quartzite outcrop is visible along the western edge of the Project APE at this location. Based on the Phase I artifact distribution, Site 6 likely extends further to the west and south, beyond the current APE. This site will be impacted by activities associated with proposed pipeline installation.</p> <p>Six transects of 15-m (50-ft) interval STPs were initially excavated along the project APE. Positive STPs were encountered in five transects. Radial shovel tests were subsequently excavated at 5 m (16-ft) intervals around the edges of the cluster of initial positive STPs in order to define site boundaries. A total of 102 STPs were excavated within or immediately adjacent to the Site 6 boundary, with 64 positive STPs and one incidental surface collection producing 1,299 prehistoric lithic artifacts.</p> <p>Of the 1,299 artifacts in the assemblage, 3 flakes were found in the upper few centimeters (cm) of the B horizon while the remaining 99.77 percent (n=1,296) of the artifacts occurred within the O/A horizon. Phase I shovel test artifact density ranged from one to 188 artifacts per STP. The peak artifact density (47 to 183 artifacts per STP) occurs in the northern third and along the western edge of the site (STPs D4, E3, F8, F5, F10, R18, R32, and R37). Relatively moderate densities (14-41 artifacts) also occur across the western half of the site. The Phase I artifact assemblage consists of six bifaces, eight unifaces, two cores and 1,283 debitage. The majority (>99 percent) of the lithic assemblage is comprised of quartzite, while quartz, gray chert, and gray grainy metamorphic material all combined constitute less than one percent. Evidence suggestive of thermal alteration was noted on 19 flake fragments, one utilized flake (uniface), and one biface.</p> <p>The bifaces, all made from quartzite, include three middle-stage, two late-stage, and one fragment too small to determine the stage of reduction. The uniface tools, also all made from quartzite, include six utilized flakes, one retouched flake, and one notched flake. Such expedient tools were typically used for the scraping or cutting of wood, hides and other soft materials. Both core fragments are freehand cores made from quartzite.</p> <p>The debitage sample is almost exclusively (99.5 percent; n=1,277) made from quartzite material. It consists overwhelmingly of biface reduction flakes (39 percent; n=506) and non-diagnostic flake fragments (59 percent; n=762). Early reduction flakes account for only one percent (n=15) of the collected debitage.</p> <p>Based on the results of Phase I flake type analysis, the site's prehistoric occupants appear to have been focused on later stage lithic reduction activities, typically associated with biface manufacture or projectile point refurbishing. The preponderance of quartzite artifacts is not surprising as natural quartzite outcrops occur adjacent to this site and are prevalent along the broader landscape. However, given that only 15 flakes represent early-stage reduction and exhibit cortex, it appears quarrying activities was not a primary activity carried out on this site, unless the raw material was removed to a different location prior to the majority of the initial reduction being performed.</p> <p>Although no temporally diagnostic artifacts were recovered, the overall high density of artifacts and the presence of a fair number of other bifaces and flake tools, suggest this site has potential to contain diagnostic artifacts. Further, the presence of thermally-altered artifacts may signal the presence of cultural features such as hearths/fire pits. Therefore, GWNF Site 6 has potential to yield data that would contribute to understanding precontact-period occupation/utilization of the region. Therefore, GAI recommends that GWNF Site 6 is Potentially Eligible for listing in the NRHP under Criterion D. Site avoidance or additional archaeological investigations (Phase II) are recommended for this site.</p>
Surveyor's Eligibility Recommendations:	Recommended Potentially Eligible
Surveyor's NR Criteria Recommendations, :	D
Surveyor's NR Criteria Considerations:	No Data

Photographs of a Lime Kiln on the East Property near the ACP proposed route





Native American Burial Ground and related cultural resources (East Burial Mound)

The Augusta County Historical Society has grave concerns about the ACP's proximity to this sacred burial area and potential village site. The Society notes that the survey team has failed to recognize and therefore has dismissed evidence that the project would be infringing on this area. The Society would like to have further investigation of this site and the surrounding area and potentially associated sites. Further, we would like to bring in Tribal Consultation for this site as it is a burial ground.

We have serious concerns over the proximity of the ACP APE to the burial mound/temple, village and town located along the Middle River near the village of Churchville. Apparently no one from ACP has surveyed the site, which has been surveyed and documented at least three times since the second half of the 20th century. Those instances are on record with VDHR and would be hard to miss. Although this site is just outside the APE, it is clearly connected to an archaeological site within the APE.

A survey of 44AU0035 was generated on April 10, 2015, referencing a survey from 1997. That survey referenced the 1952 test strip in the mound that uncovered 129 pottery sherds, 17 chips, 44 points and blades, two drills, 2 pipes, and 1 celt. There were three burial groups discovered as well. (Holland in *BAE Bulletin* 173, 1960, Report ASV *Bulletin* "The East Mound", Meggers, vol 7, No 3, March 1953.)

In 1965, an extensive excavation occurred. During this investigation approximately 143 skeletons were removed although many more were so deteriorated that they could not be moved meaning that the ground remains a place where human remains are buried. There were many stone points, pipes, and pottery pieces removed as well. There were some shell beads, animal bones, and an eagle talon.

The results of the 1965 research point to a time period of between 960 A.D. to 1320 A.D. – an almost 300-year-period when the mound was in use. Archaeologists therefore described the mound as Late Woodland and noted that it was probably in close proximity to a village or semi-permanent encampment. It should be noted that Native American artifacts in the Churchville area are commonplace, particular around springs. (*Augusta Historical Bulletin*, 2015)

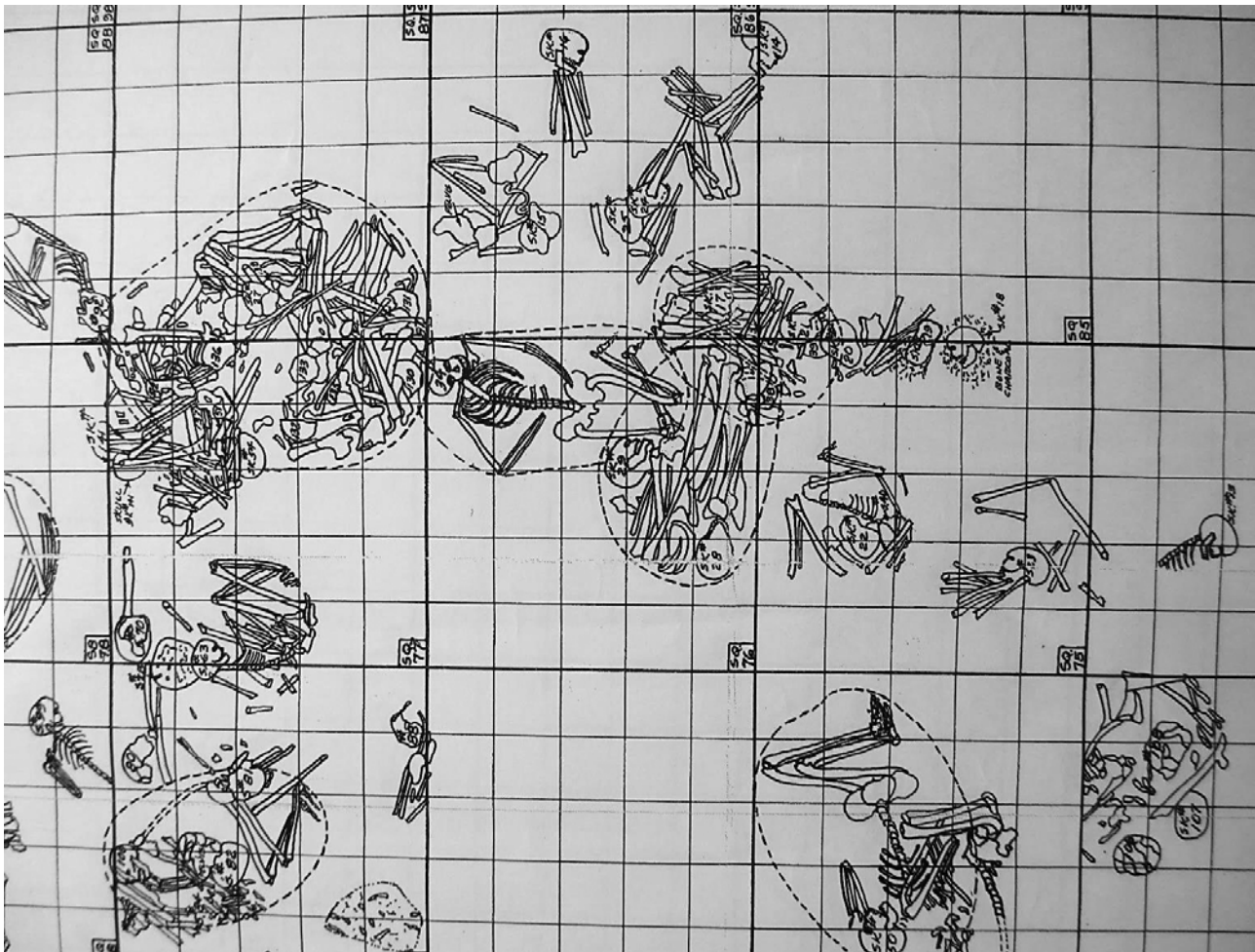
In the Summary of Archaeological Resources in the APE, 44AU0919 Appendix A, sheet 13 AP1, MP 129.0 and 44AU0920 Appendix A, Sheet 13 AP1, MP 130.3 the surveys note lithic scatter but declare the sites ineligible for the NRHP. Anyone checking the existing archaeological resources at VDHR could not help but notice the proximity of this site with two existing documented sites related to the East Burial Mound. It makes sense that the test sites, especially 0920 are part of a larger Late Woodland complex considering that it appears between two recorded VDHR sites. Further investigation into the connection between these sites is warranted.

Site 44AU0920, located on a slope above Middle River produced 13 of 23 positive shovel tests that revealed 52 artifacts. The report notes that: "Site delineation suggests that the cultural remains may extend beyond the current Project survey corridor to the west. Although it is unlikely that significant remains would be present, the portion of the site beyond the survey corridor was not investigated, so a NRHP eligibility recommendation cannot be made for the site overall. However, that portion of the site in the APE lacks further research value, and would not contribute to the eligibility of the site as a whole. Therefore, the proposed construction through this portion of 44AU0920 would pose no adverse effect; ERM recommends no further work at the site."

The Augusta County Historical Society would like to dispute these recommendations and suggest that the site is culturally connected to the larger East Mound burial and village complex that was inhabited for almost three centu-

ries. Further, final reports from archaeologists in the 1960s suggest that less than half of the human remains were successfully removed from the site. This site not only warrants further investigation, but it is a sacred burial ground that should not be permanently disturbed and destroyed by the ACP. We would like to bring in Tribal Consultation for this site.





Approximately 130 burials were exhumed in the 1965 archaeological project. It was estimated that there were originally about 300 burials in the mound but many were too deteriorated to be removed. A portion of the map showing the location of the burials is at top. A burial is seen below left and a shell necklace from the site is seen below right.



Cochran's Chapel/Church Site 007-914

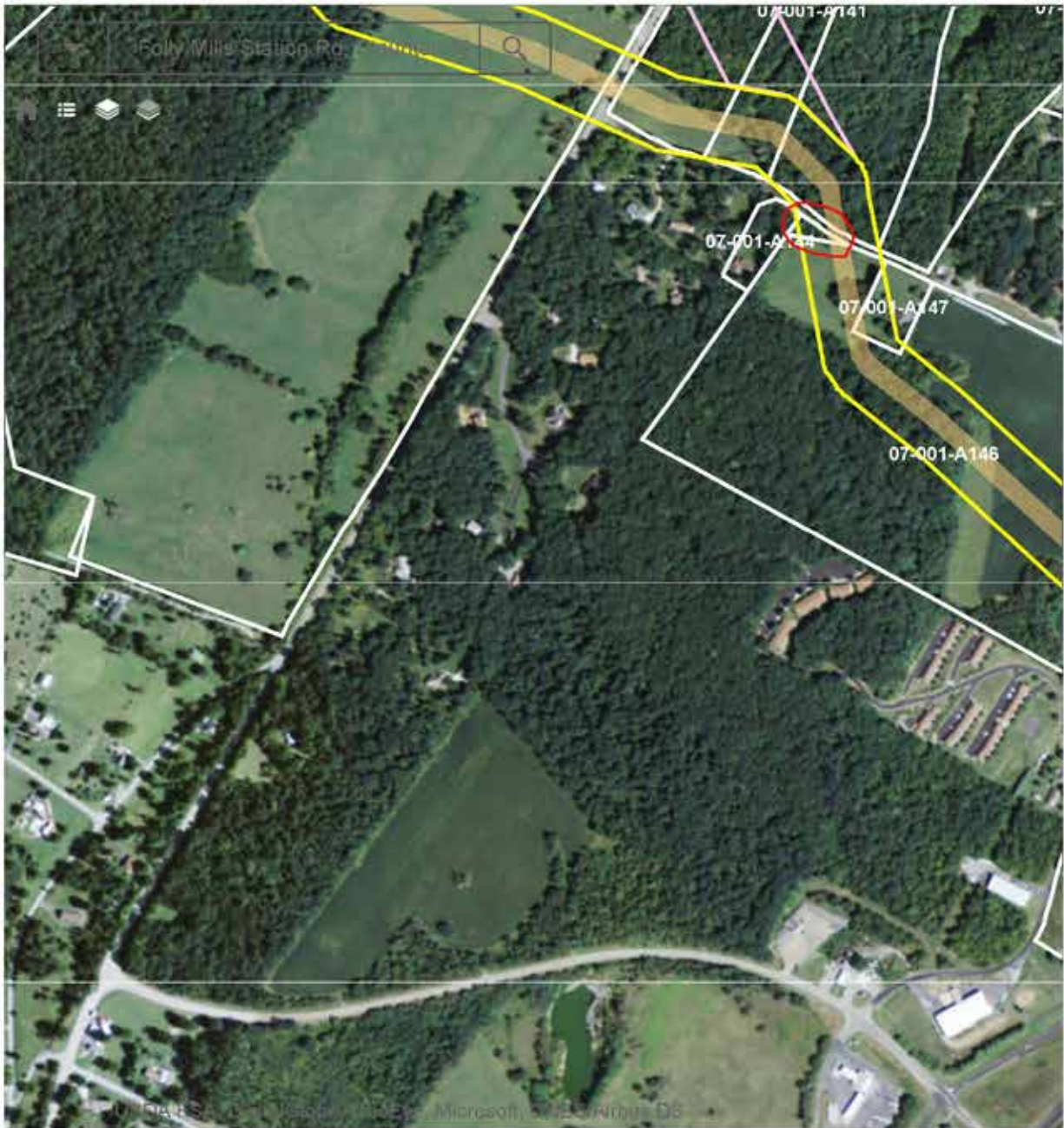
Although this early 20th-century African-American chapel is no longer extant, the site should at least warrant an archaeological survey. (**Note: the Dovetail report lists this site as extant but unevaluated.**) The tract, which is less than half an acre, was the site of a rural black Baptist church congregation made up of African-American families descended from slaves once associated with the nearby Folly Farms plantation (on the National Register of Historic Places). The land was given to the families by members of the Cochran family (current owners of Folly Farm) and reverted to them once the church moved about a half mile away in the late 20th century.

The structure was extant when Ann McCleary surveyed it in November of 1981.

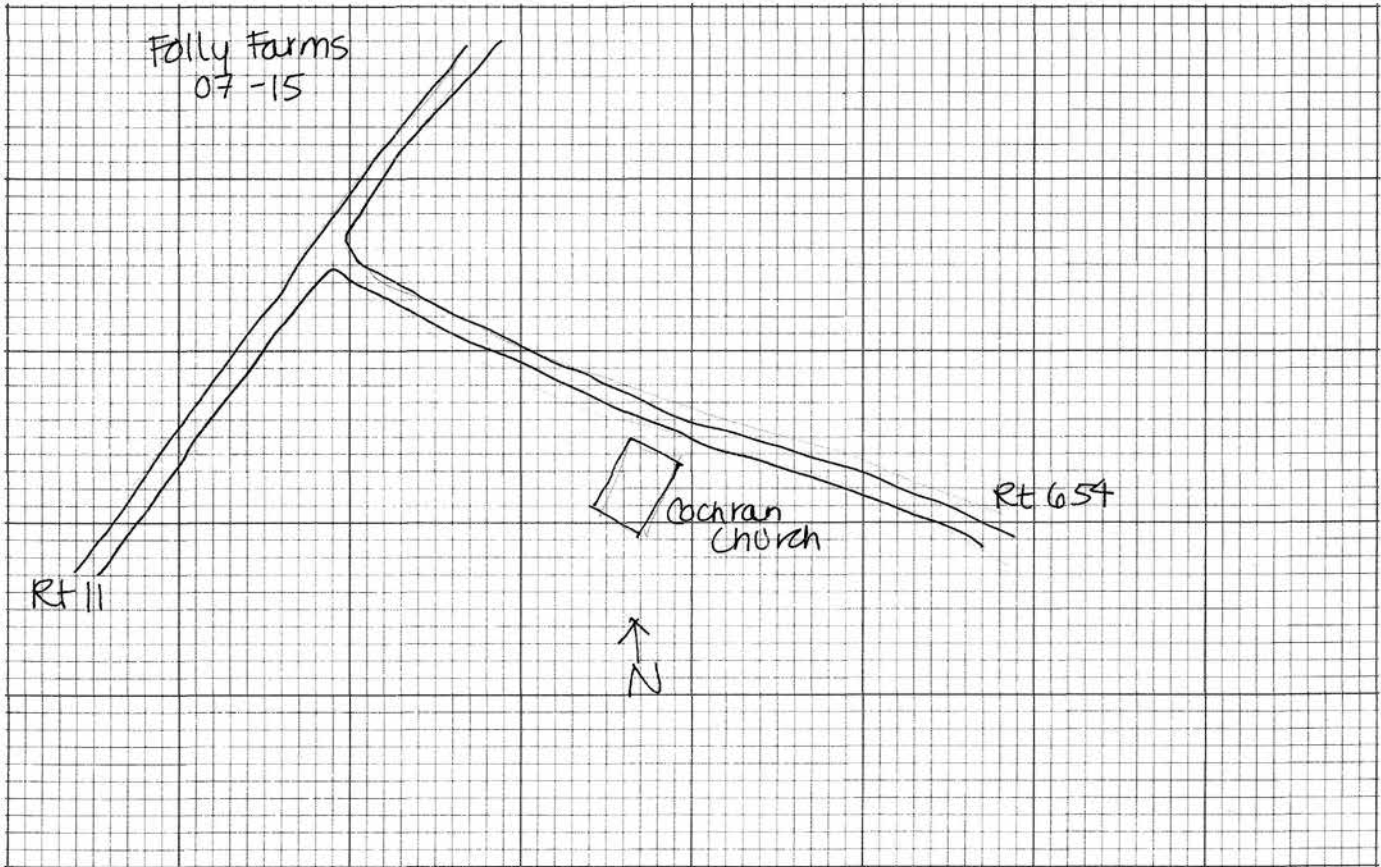
The survey is filed with VDHR and the tax records clearly list the property as Cochran's Chapel. Further, Doyle Land representatives knew about the existence of the property because they traced the ownership back to the Cochrans in order to map and survey the pipeline route.

Why this property was not at least noted by the cultural resources team or the land survey team as a potential archaeological site is unclear. At a minimum, an archaeological survey should take place on this site. A photograph of the building as well as a map locating the building footprint on the site is included in file number 07-914.





Site plan (Locate and identify outbuildings, dependencies and significant topographical features.)



Name, address and title of recorder
Ann McCleary, Architectural Historian, VHLC

James Madison University
Archeological Research Center

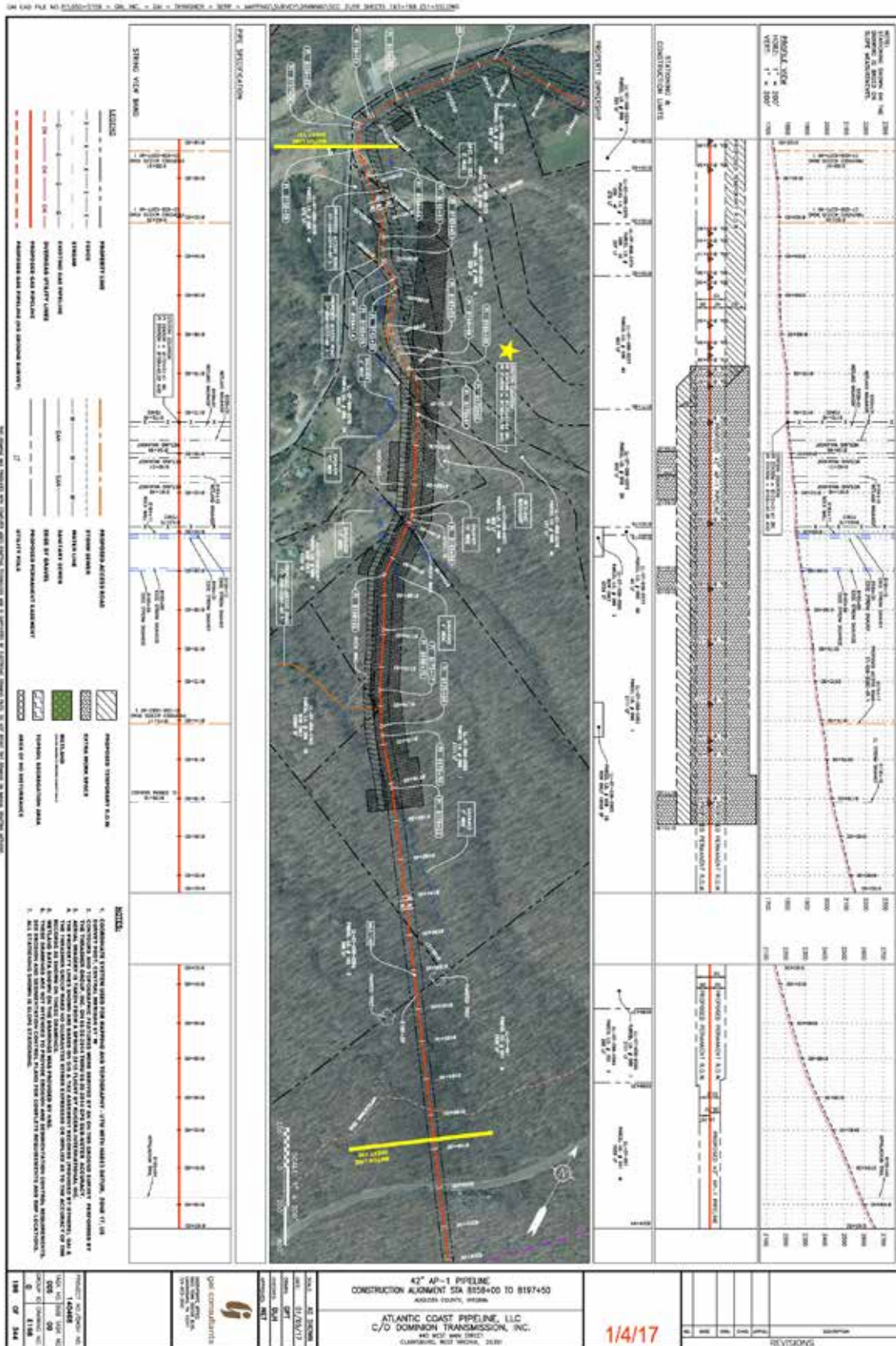
Date
November, 1981

Hazel Palmer's Stone Walls





Dominion map showing Palmer stone walls



Document Content(s)

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