



WEST VIRGINIA
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January 31, 2008

Mr. Fred E. Pozzuto
Project Manager
Dept. of the Army
William S. Moorhead Fed.
1000 Liberty Avenue
Pittsburgh, PA 15222

RE: Highlands Development - Phase V
Application Number 200100145
FR#: 07-1544-OH-2

Dear Mr. Pozzuto:

We have reviewed the additional information submitted by Wallace & Pancher, Inc. on behalf of Ohio County Development Authority for the above referenced project to determine its effects to cultural resources. As required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic and Cultural Properties," we submit our comments.

Architectural Resources:

It is our understanding that there is one building that will be directly or indirectly impacted by this project. That building, the Storch Barn, was assessed in our December 2007 letter. It is our continued opinion that the barn is not eligible for inclusion on the National Register of Historic Places. It is our understanding that no other buildings or structures will be impacted by this project; therefore, it is our opinion that Phase V will have no impact upon architectural resources eligible for or included on the National Register of Historic Places. No further consultation regarding architectural resources is necessary.

Archaeological Resources:

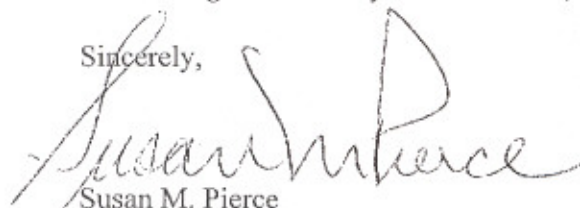
The additional information documents public comments to the proposed Phase V development and a revised Alternatives Analysis. The documentation is correct in noting that a Phase I archaeological survey report was submitted for our review. However, our December 21, 2007 letter was intended to comment on only those portions of the Highlands Development Phase V that were covered by the survey. Notably, the survey did not include the ridge top portions of the proposed project area, nor did it address the wetland mitigation area. According to the recently submitted documentation, the wetland mitigation area presented in the public notice will not be used. Instead, the documentation states that mitigation work will occur within the existing stream channel and immediate riparian area of

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Middle Wheeling Creek in an area adjacent to the previously proposed mitigation area. However, a map depicting the location of the newly proposed wetland mitigation area was not included in the submitted documentation. We still have concerns that currently unknown archaeological resources may be impacted by the proposed project activities, but need more information in order to comment. Therefore, we reiterate the request made in our October 10, 2007 letter. Please submit a USGS topographic map indicating the location of the proposed wetlands mitigation area. Please submit photographs of the Phase V development area and the wetland mitigation area that document current land conditions and any known disturbances. Please key these photographs to a project map. Also, please submit a description of any known disturbances to the proposed project area. We will provide further comments upon receipt of this information.

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

Sincerely,



Susan M. Pierce
Deputy State Historic Preservation Officer

SMP/LAL/SSB