

March 14, 2018

Mr. Roger Kirchen  
Virginia Department of Historic Resources  
Division of Review and Compliance  
2801 Kensington Avenue  
Richmond, VA 23221

**Subject: Mountain Valley Pipeline Project  
Management Summary, Work Plan and Schedule for the Bent Mountain  
(080-5677), Bent Mountain Apple Orchard (080-5731), and Coles-Terry (080-  
5689) Rural Historic Districts  
FERC DOCKET NO. CP16-10, DHR FILE #2014 1194**

Dear Mr. Kirchen:

On behalf of Mountain Valley Pipeline, LLC (Mountain Valley), a joint venture between affiliates of EQT Midstream Partners, LP and affiliates of NextEra Energy, Inc., Con Edison Midstream Gas, LLC, WGL Holdings, Inc., and RGC Midstream LLC, you will find enclosed one (1) CD and one (1) hard copy of *Mountain Valley Pipeline Project, Management Summary, Work Plan and Schedule Historic Property Treatment Plan Implementation: Bent Mountain (080-5677), Bent Mountain Apple Orchard (080-5731), and Coles-Terry (080-5689) Rural Historic Districts* dated March 2018. This Work Plan is based upon the February 2018 Treatment Plan for Bent Mountain, Bent Mountain Apple Orchard, and Coles-Terry Rural Historic Districts.

The Federal Energy Regulatory Commission (FERC) has been consulting with the Virginia Department of Historic Resources (DHR) on the treatment of historic properties that will be adversely impacted by the proposed project. A document titled *Mountain Valley Pipeline Project Revised Historic Property Treatment Plan: Bent Mountain (080-5677) Rural Historic District, Bent Mountain Apple Orchard Rural Historic District (080-5731), and Coles-Terry (080-5689) Rural Historic District* (Treatment Plan), dated February 2018, was developed to document Mountain Valley's efforts to coordinate with consulting parties and other stakeholders to identify mitigation measures appropriate to address the proposed project's potential adverse effects to the Bent Mountain (080-5677) Rural Historic District, Bent Mountain Apple Orchard Rural Historic District (080-5731), and Coles-Terry (080-5689) Rural Historic District. The Treatment Plan also proposed mitigation measures designed to mitigate the adverse effects of the project. In accordance with Stipulation III.B.1 of the Programmatic Agreement (PA) for the Project, DHR accepted the Treatment Plan in a letter dated March 8, 2018. In a letter dated March 13, 2018, and in accordance with Stipulation III.B.5 of the PA, the FERC indicated that it agreed with DHR's finding and requested that the Management Summary for the implementation of the Treatment Plan address the comments of DHR and other parties.

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23, 2018, teleconference between DHR and Mountain Valley, fulfills the Management Summary requirement in Stipulation IV.H of the PA. In this teleconference, it was agreed that Mountain Valley would provide a status of the implementation of the Treatment Plan activities and a detailed work plan rather than a more traditional management summary that documents the successful conclusion of fieldwork activities associated with a treatment plan. Mountain Valley suggested this approach since many of the activities associated with this Treatment Plan will happen throughout the next 12-16 months. This document also addresses the comments received from DHR in the March 8, 2018, letter, the Roanoke County comments in a February 22, 2018 letter, Preserve Roanoke's filing on March 2, 2018, and Mr. and Mrs. Scott's comments filed on March 8, 2018.

Should you have any questions or comments, feel free to contact Evelyn Tidlow by telephone at (612) 812-5478 or by email at E.Tidlow@gaiconsultants.com. Thank you for your attention.

Sincerely,



Brian M. Clauto

Senior Environmental Coordinator

Attachment: One (1) hard copy and one (1) CD with Management Summary, Work Plan, and Schedule the Bent Mountain (080-5677), Bent Mountain Apple Orchard (080-5731), and Coles-Terry (080-5689) Rural Historic Districts

cc: John Centofanti, EQT Corporation (without attachments)  
Jacob Freedman, SEARCH (without attachments)  
Evelyn Tidlow, GAI (without attachments)

March 14, 2018

Ms. Alison Blanton  
Roanoke Valley Preservation Foundation  
120 West Campbell Avenue SW  
Roanoke, VA 24011

**Subject: Mountain Valley Pipeline Project  
Management Summary, Work Plan and Schedule for the Bent Mountain  
(080-5677), Bent Mountain Apple Orchard (080-5731), and Coles-Terry (080-  
5689) Rural Historic Districts  
FERC DOCKET NO. CP16-10, DHR FILE #2014 1194**

Dear Ms. Blanton:

On behalf of Mountain Valley Pipeline, LLC (Mountain Valley), a joint venture between affiliates of EQT Midstream Partners, LP and affiliates of NextEra Energy, Inc., Con Edison Midstream Gas, LLC, WGL Holdings, Inc., and RGC Midstream LLC, you will find enclosed one (1) CD and one (1) hard copy of Mountain Valley Pipeline Project, Management Summary, Work Plan and Schedule Historic Property Treatment Plan Implementation: Bent Mountain (080-5677), Bent Mountain Apple Orchard (080-5731), and Coles-Terry (080-5689) Rural Historic Districts dated March 2018. This Work Plan is based upon the February 2018 Treatment Plan for Bent Mountain, Bent Mountain Apple Orchard, and Coles-Terry Rural Historic Districts.

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Brian M. Clauto  
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Mary Krueger, NPS (with attachments)  
Ann Rogers, CAPP (with attachments)  
Sonja Ingram, Preservation Virginia (with attachments)  
Ashley Webb, Historical Society of Western Virginia (with attachments)  
Richard Caywood, Roanoke County (with attachments)  
Grace Terry (with attachments)  
John Centofanti, EQT (with no attachments)  
Evelyn Tidlow, GAI (with no attachments)

March 14, 2018

Ms. Ann Rogers  
Preserve Roanoke and Committee for Appalachian and Piedmont Preservation  
6347 Back Creek Road  
Boones Mill, VA 24065

**Subject: Mountain Valley Pipeline Project  
Management Summary, Work Plan and Schedule for the Bent Mountain  
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Dear Ms. Rogers:

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Alison Blanton, Roanoke Valley Preservation Foundation (with attachments)  
Grace Terry (with attachments)  
John Centofanti, EQT (with no attachments)  
Evelyn Tidlow, GAI (with no attachments)

March 14, 2018

Ms. Ashley Webb  
Historical Society of Western Virginia  
101 Shenandoah Avenue NE  
Roanoke, VA 24016

**Subject: Mountain Valley Pipeline Project  
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(080-5677), Bent Mountain Apple Orchard (080-5731), and Coles-Terry (080-  
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FERC DOCKET NO. CP16-10, DHR FILE #2014 1194**

Dear Ms. Webb:

On behalf of Mountain Valley Pipeline, LLC (Mountain Valley), a joint venture between affiliates of EQT Midstream Partners, LP and affiliates of NextEra Energy, Inc., Con Edison Midstream Gas, LLC, WGL Holdings, Inc., and RGC Midstream LLC, you will find enclosed one (1) CD and one (1) hard copy of Mountain Valley Pipeline Project, Management Summary, Work Plan and Schedule Historic Property Treatment Plan Implementation: Bent Mountain (080-5677), Bent Mountain Apple Orchard (080-5731), and Coles-Terry (080-5689) Rural Historic Districts dated March 2018. This Work Plan is based upon the February 2018 Treatment Plan for Bent Mountain, Bent Mountain Apple Orchard, and Coles-Terry Rural Historic Districts.

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Richard Caywood, Roanoke County (with attachments)  
Alison Blanton, Roanoke Valley Preservation Foundation (with attachments)  
Grace Terry (with attachments)  
John Centofanti, EQT (with no attachments)  
Evelyn Tidlow, GAI (with no attachments)

March 14, 2018

Ms. Grace Terry  
4718 Wembley Place SW  
Roanoke, VA 24018

**Subject: Mountain Valley Pipeline Project  
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Dear Ms. Terry:

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cc: Richard Caywood, Roanoke County (with attachments)  
Roger Kirchen, VDHR (with attachments)  
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Ann Rogers, CAPP (with attachments)  
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Alison Blanton, Roanoke Valley Preservation Foundation (with attachments)  
John Centofanti, EQT (with no attachments)  
Evelyn Tidlow, GAI (with no attachments)

March 14, 2018

Ms. Mary Krueger  
National Park Service  
950 Pearl Hill Road  
Fitchburg, MA 01420

**Subject: Mountain Valley Pipeline Project  
Management Summary, Work Plan and Schedule for the Bent Mountain  
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Evelyn Tidlow, GAI (with no attachments)

March 14, 2018

Mr. Richard Caywood  
Roanoke County Board of Supervisors  
5204 Bernard Drive  
Roanoke, VA 24018

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Evelyn Tidlow, GAI (with no attachments)

March 14, 2018

Ms. Sonja Ingram  
Preservation Virginia  
204 West Franklin Street  
Richmond, VA 23220

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Valley would provide a status of the implementation of the Treatment Plan activities and a detailed work plan rather than a more traditional management summary that documents the successful conclusion of fieldwork activities associated with a treatment plan. Mountain Valley suggested this approach since many of the activities associated with this Treatment Plan will happen throughout the next 12-16 months. This document also addresses the comments received from DHR in the March 8, 2018, letter, the Roanoke County comments in a February 22, 2018 letter, Preserve Roanoke's filing on March 2, 2018, and Mr. and Mrs. Scott's comments filed on March 8, 2018.

Should you have any questions or comments, feel free to contact Evelyn Tidlow by telephone at (612) 812-5478 or by email at E.Tidlow@gaiconsultants.com. Thank you for your attention.

Sincerely,



Brian M. Clauto  
Senior Environmental Coordinator

Attachment: One (1) hard copy and one (1) CD with Management Summary, Work Plan, and Schedule the Bent Mountain (080-5677), Bent Mountain Apple Orchard (080-5731), and Coles-Terry (080-5689) Rural Historic Districts

cc: Roger Kirchen, VDHR (with attachments)  
Mary Krueger, NPS (with attachments)  
Ann Rogers, CAPP (with attachments)  
Ashley Webb, Historical Society of Western Virginia (with attachments)  
Richard Caywood, Roanoke County (with attachments)  
Alison Blanton, Roanoke Valley Preservation Foundation (with attachments)  
Grace Terry (with attachments)  
John Centofanti, EQT (with no attachments)  
Evelyn Tidlow, GAI (with no attachments)

**MOUNTAIN VALLEY PIPELINE PROJECT**

**MANAGEMENT SUMMARY, WORK PLAN, AND SCHEDULE  
HISTORIC PROPERTY TREATMENT PLAN IMPLEMENTATION**

**Bent Mountain (080-5677), Bent Mountain Apple Orchard (080-5731), and  
Coles-Terry (080-5689) Rural Historic Districts**

**DOCKET NO. CP16-10  
DHR FILE #2014 1194**

**Prepared for**



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**Prepared by**



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**March 2018**

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## 1.0 INTRODUCTION

Mountain Valley Pipeline, LLC (Mountain Valley), a joint venture between affiliates of EQT Midstream Partners, LP, NextEra Energy, Inc., Con Edison Gas Midstream, LLC, WGL Holdings, Inc., and RGC Midstream, LLC, has obtained a Certificate of Public Convenience and Necessity (Certificate) from the Federal Energy Regulatory Commission (FERC) pursuant to Section 7(c) of the Natural Gas Act, authorizing it to construct and operate the proposed Mountain Valley Pipeline project located in 17 counties in West Virginia and Virginia. Mountain Valley plans to construct an approximately 303-mile, 42-inch diameter natural gas pipeline to provide timely, cost-effective access to the growing demand for natural gas for use by local distribution companies, industrial users, and power generation in the Mid-Atlantic and southeastern markets, as well as potential markets in the Appalachian region. The proposed pipeline will extend from the existing Equitrans, L.P. transmission system and other natural gas facilities in Wetzel County, West Virginia, to Transcontinental Gas Pipe Line Company, LLC's Zone 5 compressor station 165 in Pittsylvania County, Virginia.

The FERC is the lead federal agency for compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA) for this undertaking. As a result, the FERC directed Mountain Valley to coordinate with the Virginia Division of Historic Resources (DHR), which serves as the State Historic Preservation Office (SHPO), following the FERC guidelines related to cultural resources compliance with Section 106 on FERC-regulated projects. Following submittal of the Criteria of Effects Report (May 2017) for the project, DHR issued its opinion in a letter dated July 7, 2017, that the proposed project will adversely affect the Bent Mountain Rural Historic District (080-5677) and the Coles-Terry Rural Historic District (080-5689), both determined eligible for the National Register of Historic Places (NRHP). Subsequently, DHR's National Register Evaluation Committee determined that the proposed Bent Mountain Apple Orchard Rural Historic District (080-5731)—located within the boundaries of the previously identified Bent Mountain Rural Historic District (080-5677)—is also eligible for listing in the NRHP. In a letter dated November 8, 2017, DHR recommended that the FERC individually recognize this new district as an historic property and, as with the Bent Mountain Rural Historic District, found that the Bent Mountain Apple Orchard Rural Historic District (080-5731) will be adversely affected by this undertaking.

The FERC has been consulting with the DHR on the treatment of historic properties that will be adversely impacted by the proposed project. A document titled *Mountain Valley Pipeline Project Revised Historic Property Treatment Plan: Bent Mountain (080-5677) Rural Historic District, Bent Mountain Apple Orchard Rural Historic District (080-5731), and Coles-Terry (080-5689) Rural Historic District* (Treatment Plan), dated February 2018, was developed to document Mountain Valley's efforts to coordinate with consulting parties and other stakeholders to identify mitigation measures appropriate to address the proposed project's potential adverse effects to the Bent Mountain (080-5677), Bent Mountain Apple Orchard (080-5731), and Coles-Terry (080-5689) Rural Historic Districts. The Treatment Plan also proposed mitigation measures designed to mitigate the adverse effects of the project. In accordance with Stipulation III.B.1 of the Programmatic Agreement (PA) for the project, the DHR, in a letter to the FERC dated March 8, 2018, provided comments on the Treatment Plan. (**Attachment 1** includes copies of correspondence not yet filed on the docket discussed in this Management Summary.)

Comments on the Treatment Plan were also received from the Water and Power Law Group PC on behalf of Roanoke County in a letter dated February 22, 2018. On behalf of Preserve Roanoke, Ann Roger filed a comment letter on the FERC docket on March 2, 2018, and on March 8, 2018, James and Karen Scott provided comments in a letter filed on the docket.

In a letter dated March 13, 2018, the FERC indicated that it approves the Revised Treatment Plans in accordance with Stipulation III.B.5 of the PA. Further, the FERC directed Mountain Valley to address the comments on the Treatment Plan from the DHR and other parties in the Management Summary.

This document, prepared by SEARCH on behalf of Mountain Valley, also provides a proposed work plan and schedule for the implementation of the approved Treatment Plan and, per a February 23, 2018, teleconference between DHR and Mountain Valley, fulfills the Management Summary requirement in Stipulation IV.H of the PA. In this teleconference, it was agreed that Mountain Valley would provide a status of the implementation of the Treatment Plan activities and a detailed work plan rather than a more traditional management summary that documents the successful conclusion of fieldwork activities associated with a treatment plan. Mountain Valley suggested this approach since many of the activities associated with this Treatment Plan will happen throughout the next 12-16 months and fieldwork activities such as photography and measurement of significant contributing properties will occur at multiple times to thoroughly document the district. This document also addresses the comments received from the DHR in its March 8, 2018, letter, the Roanoke County comments in the February 22, 2018 letter, Preserve Roanoke's filing on March 2, 2018, and Mr. and Mrs. Scott's comments filed on March 8, 2018.

## **1.1 DHR'S MARCH 8, 2019, COMMENTS**

The DHR found the Treatment Plan to be "reasonable in scale, proportionate to the effect, and takes into consideration previous comments from DHR, the Advisory Council on Historic Preservation, and other consulting parties," however, DHR provided additional comments on several issues related to the distribution of mitigation funds to Roanoke County and location of access road MVP-RO-281 located in proximity to the Henry-Waldron Cemetery (080-5690). The DHR also pointed out several formatting issues with the Treatment Plan as it was submitted.

### **1.1.1 Distribution of Bent Mountain Center Preservation Fund**

DHR requested that Mountain Valley provide to DHR a letter of intent from Roanoke County that reflects their willingness to accept mitigation funds and the requisite terms and conditions as presented in the Treatment Plan. Mountain Valley will provide this documentation to DHR upon receipt.

### **1.1.2 Access Road MVP-RO-281**

DHR acknowledged that Mountain Valley's *Clarification Regarding Proposed Access Road in the Vicinity of the Henry-Waldron Cemetery (080-5690)*, dated January 17, 2018, shows that the cemetery will be avoided and protected during the construction, use, and restoration of access road MVP-RO-281. However, DHR recommended that "all efforts be taken to increase the 11-foot buffer between the cemetery and access road by shifting the limits of disturbance completely to the north side of the existing dirt path." Mountain Valley will evaluate alternatives in coordination

with the landowner and will file a revised Avoidance Plan with the FERC that increases the buffer between the access road limits of disturbance and the cemetery.

### **1.1.3 Amendment of the Plan to Address Formatting Issues**

The DHR noted that the Treatment Plan, including the Table of Contents and Figures, regularly references Section 4.3 of the plan, but this section does not exist. Mountain Valley will produce an amended version of the plan and will distribute to the appropriate parties.

## **1.2 ROANOKE COUNTY'S FEBRUARY 22, 2018, COMMENTS**

Roanoke County states that “Mountain Valley did not complete the consultation process provided under Stipulation III.B.5 of the Programmatic Agreement” and “the proposed compensatory mitigation is not proportional to the MVP Project’s adverse effects and does not adequately consider the input of consulting parties local stakeholders.” The letter goes on to provide comments on the mitigation measures proposed in the Treatment Plan indicating that “the County supports the first two measures [Enhanced Right-of-Way Treatment and the PIF for the Bent Mountain Rural Historic District and National Register of Historic Places nominations for the Bent Mountain Apple Orchard and Coles-Terry Rural Historic Districts]” but that “while the County generally supports the third measure [preservation and restoration of the Bent Mountain Center], it objects to Mountain Valley’s proposal to limit the funding for this purpose to \$500,000 because it is not proportional to the adverse effect and does not reflect the County’s input.”

The DHR found the Treatment Plan to be “reasonable in scale, proportionate to the effect, and takes into consideration previous comments from DHR, the Advisory Council on Historic Preservation, and other consulting parties.” While Mountain Valley is sympathetic to the sincere concerns expressed by Roanoke County, the mitigation fund is a supplemental compensatory measure and is unrelated to the specific adverse effect to the district identified by DHR. Additionally, as noted in the Treatment Plan, the funds proposed can be augmented by applications for grants from the existing mitigation fund created by the Commonwealth of Virginia and administered by the Virginia Historical Society for this purpose.

## **1.3 PRESERVE ROANOKE'S MARCH 2, 2018, COMMENTS**

On behalf of Preserve Roanoke, Ms. Rogers identified the following issues in the “critique of individual portions of the treatment plan” portion of her comment letter:

- Reforestation and revegetation
- Misleading use of the term “undulating edge” of pipeline corridor
- Insufficient photograph simulations
- Financial underwriting of eligibility determination documents

Revegetation and reforestation were addressed extensively in the Treatment Plan. The areas Mountain Valley proposed to target for enhanced right-of-way treatment, which will result in the appearance of an undulating edge of the pipeline corridor, were developed in response to the

requests of the various parties for right-of-way treatments similar to those approved by the US Forest Service to be employed on Forest Service land.

In a July 7, 2017, letter DHR generally concurred with Mountain Valley’s Criteria of Effects Report (May 2017) which employed DHR-approved methods to derive impact analyses, including the photograph simulations that Ms. Rogers references. DHR did request additional photograph simulations for specific resources. Mountain Valley provided the requested simulations to DHR and received concurrence regarding the resulting analyses and recommendations.

The consultation surrounding the Mountain Valley’s proposal to fund eligibility determination documents—two National Register of Historic Places (NRHP) Nominations and a Preliminary Information Form (PIF)—was documented extensively in the Treatment Plan. As noted in Section 4.2 of the Treatment Plan, in a letter dated September 9, 2017, Ms. Rogers proposed that the Treatment Plan be revised to include a NRHP Nomination for the Bent Mountain Apple Orchard Rural Historic District. The Treatment Plan was revised accordingly to meet Ms. Rogers’s request. As noted in Section 1.1, in DHR’s opinion, the Treatment Plan (including the proposed eligibility determination documents) is “reasonable in scale and proportionate to the effect, and takes into consideration previous comments from DHR, the Advisory Council on Historic Preservation, and other consulting parties.”

#### **1.4 JAMES AND KAREN SCOTT’S MARCH 8, 2018, COMMENTS**

The Scotts’ requested that the FERC urge Mountain Valley to file the project’s alignment within the Scott property and expressed concern that the condemned pipeline route transects the Henry-Waldron Cemetery. This issue is addressed above in Section 1.1.2.

## **2.0 APPROACH AND ASSUMPTIONS**

As documented in the approved Treatment Plan to address adverse impacts on the Bent Mountain, Bent Mountain Apple Orchard, and Coles-Terry Rural Historic Districts, Mountain Valley consulted with consulting parties and identified both minimization and mitigation measures to address the adverse effect identified by DHR. These measures include the restriction of the project’s maintained permanent easement within the historic district; the establishment of a \$500,000 fund dedicated to the preservation and restoration of the Bent Mountain Center; preparation of a PIF for the Bent Mountain Rural Historic District; preparation of a NRHP Nomination for the Bent Mountain Apple Orchard Rural Historic District; and preparation of a NRHP Nomination for the Coles-Terry Rural Historic District.

### **2.1 ENHANCED RIGHT-OF-WAY TREATMENT TO REDUCE VISIBILITY OF PERMANENTLY MAINTAINED CORRIDOR**

Mountain Valley will implement an Enhanced Right-of-Way Treatment to Reduce Visibility of Permanently Maintained Corridor to minimize potential visual impacts from the project as documented in the Treatment Plan. Within the following route segments, listed in Tables 2.1-2.3, Mountain Valley will revegetate the right-of-way to ensure that vegetative openings appear more natural and conform to the natural form, line, color, and texture of the existing landscape.

**Table 2.1. Bent Mountain Rural Historic District.**

Segment	Milepost	Length (feet)	Mileage
1	242.50-242.86	1,901	0.36
2	243.29-243.57	1,478	0.28
	<b>Total</b>	3,379	0.64

**Table 2.2. Bent Mountain Apple Orchard Rural Historic District.**

Segment	Milepost	Length (feet)	Mileage
1	245.15-245.35	1,056	0.20
	<b>Total</b>	1,056	0.20

**Table 2.3. Coles-Terry Rural Historic District.**

Segment	Milepost	Length (feet)	Mileage
1	240.10-240.40	1,584	0.30
2	240.80-241.33	2,798	0.53
3	241.47-241.60	686	0.13
	<b>Total</b>	5,068	0.96

In a letter dated November 3, 2017, DHR encouraged the FERC to work with the consulting parties to consider “the possibility of constricting the maintained pipeline right-of-way as it crosses historic properties, and especially public roads within historic districts.” In a letter to the FERC dated January 18, 2018, the Advisory Council on Historic Preservation (ACHP) reiterated a similar request from consulting parties and stakeholders that the FERC require Mountain Valley to follow practices similar to those required by the US Forest Service in the Jefferson National Forest to reduce the distinctive appearance of the right-of-way in high visibility areas in and near the affected historic districts.

Mountain Valley’s proposed minimization plan to address potential adverse effects focuses on further reducing the visibility of the maintained permanent right-of-way from locations with potential visibility within the district, including high visibility areas such as main arterial roadways—a primary concern expressed by DHR, Roanoke County, and the ACHP. This approach will aid in the preservation of scenic and natural resources, which, as noted by Roanoke County in its November 17, 2017, letter, “are essential to the rural character of the historic district.”

As documented in the Treatment Plan, Mountain Valley will revegetate the construction and permanent operational right-of-way, which entails maintaining an herbaceous strip 10-foot-wide centered over the pipeline, and performing trimming or selective cutting of trees more than 15 feet in height within a 30-foot-wide strip centered over the pipeline. Outside the 10-foot-wide strip (reduced from the typical 50-foot width), the remainder of the construction and permanent right-of-way would be revegetated through the use of acceptable seed mixes, pollinator plants, shrubs, and trees in accordance with the FERC Plan and Procedures (FERC Plan) and consistent with the Virginia Department of Environmental Quality’s (DEQ) approval. Particularly along the edge of this herbaceous linear opening, a variety of sizes and species of vegetation would be planted in a manner that breaks up the straight, parallel edges of the corridor and reduces the hard shadow line that can draw the viewer’s attention. This enhanced right-of-way treatment would reduce the visual contrast and the potential indirect visual effects within the Bent Mountain, Bent Mountain Apple Orchard, and Coles-Terry Rural Historic Districts.

Specifically, Mountain Valley developed *Project Specific Standards and Specifications* (PSSS) for the project as required by the Virginia Stormwater Management Act. This document was approved by the DEQ in a June 2017 letter (**Attachment 1**). Compliance with the Stormwater Management Act, and by extension the DEQ-approved PSSS, also was made a condition of Mountain Valley's Clean Water Act § 401 Certification (Condition 13) for the project. Following the schedule and steps discussed in detail in the PSSS for the project, Mountain Valley generally will accomplish:

- Restoration of the right-of-way will promptly follow grading within seven (7) calendar days of final grading, weather and soil conditions permitting.
- Final cleanup of an area will be completed within 20 calendar days after backfilling of the trench in that area (10 calendar days in residential areas)
- Permanent seeding of the slopes steeper than 33 percent will be seeded immediately after final grading, weather permitting
- Areas with less than 33 percent slope will be seeded within seven (7) working days after final grading, weather and soil conditions permitting
- Acceptable seed mixes, pollinator plants, shrubs, and trees will be used in accordance with the FERC Plan and consistent with the DEQ approval
- Planting of bare-root saplings and shrubs where specified by the Treatment Plan will follow all requirements in the PSSS

The PSSS further requires that Mountain Valley inspect areas of restored vegetation at the end of the first and second growing seasons, and for such additional time as necessary until the vegetation is considered established. Permanent vegetation will not be considered established until a ground cover is achieved that is uniform and mature enough to survive and inhibit erosion. In general, a stand of vegetation will not be considered fully established until it has been maintained for one full growing season after planting. Mountain Valley anticipates that one full growing season after restoration planting is complete and vegetation has established, construction will be complete and the right-of-way enters the maintenance cycle.

Mountain Valley must provide documentation to DEQ about its long-term maintenance plans for the right-of-way. The PSSS also requires that Mountain Valley continue to properly maintain all vegetation in the right-of-way that is intended to shield portions of the project area from public view, which would include the enhanced treatment areas. The measures required by the PSSS are subject to DEQ's inspection and oversight authority.

## **2.2 PRESERVATION AND RESTORATION OF THE BENT MOUNTAIN CENTER**

A \$500,000 Bent Mountain Center Preservation Fund, dedicated to the preservation and restoration of the Bent Mountain Center (formerly the Bent Mountain Elementary School; contributing resource to the Bent Mountain Rural Historic District), will be established. In the January 4, 2018, letter to the FERC docket, Roanoke County emphasized the importance of the Bent Mountain Center as an important cultural resource within the Bent Mountain Rural Historic District. In discussions with Roanoke County on February 5, February 7, and February 8, 2018, the county reiterated the need for funding to preserve and restore this historic resource and expressed its view that additional compensatory mitigation should be provided in the Treatment Plan. As a result of these consultations, and for the purpose of providing supplemental compensatory mitigation for

the identified adverse effect on the district, the fund will be established. The fund shall be administered in continuing consultation with DHR to ensure that the moneys are used for valid mitigation purposes consistent with the Treatment Plan and the requirements and objectives of the NHPA.

The Treatment Plan included a draft Terms and Conditions document for use in transferring the fund from Mountain Valley to the Roanoke County Board of Supervisors (**Attachment 2**). Within three months from approval of the Treatment Plan, Mountain Valley will work with Roanoke County, DHR, and other consulting parties to execute the final Terms and Conditions document. Mountain Valley does not anticipate that there will be substantive changes to the terms and conditions of the draft document and will coordinate with all parties to ensure that the fund will be used for projects in compliance with the Secretary of Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* and will not cause any adverse effects to the resource. Mountain Valley committed to establish the fund within 30 days later of the following: (i) the commencement of land disturbance within the district or (ii) the date of the execution of the final Terms and Conditions document for the fund. Mountain Valley will notify DHR by email the date when the fund is established.

### **2.3 PIF AND NRHP NOMINATION FORMS**

SEARCH architectural historians and historians Jenna Dunham, MS, Mikel Travisano, MS, and Tricia Peone, PhD, all of whom exceed the Secretary of the Interior's *Professional Qualification Standards* for history or architectural history, will serve as the team for the project. Ms. Dunham will serve as Principal Investigator and point of contact for coordination with DHR for the PIF and two NRHP nominations. Mr. Travisano will serve as lead architectural historian, and Ms. Peone will serve as lead historian. Geoffrey Mohlman, MA, will serve as Quality Assurance/Quality Control manager.

SEARCH will prepare the following documents:

- PIF Resource Information Sheet for the Bent Mountain Rural Historic District (080-5677);
- NRHP Nomination for the Bent Mountain Apple Orchard Rural Historic District (080-5731); and
- NRHP Nomination for the Coles-Terry Rural Historic District (080-5689).

SEARCH will conduct the technical work necessary for the PIF in accordance with the DHR guidelines regarding the *National Register of Historic Places and Virginia Landmarks Register Evaluation Process*. SEARCH will conduct the technical work necessary for the NRHP nominations in accordance with the *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, *National Register Bulletin 21: Defining Boundaries for National Register Properties*; *National Register Bulletin 16a: How to Complete the National Register Registration Form*, and all applicable state guidelines.

### **2.3.1 Summary of Progress to Date**

In preparation for the background research task, the team has identified local and state repositories, as well as Web-based digital collections, that may contain primary and secondary source material related to the Bent Mountain Rural Historic District (080-5677), the Bent Mountain Apple Orchard Rural Historic District (080-5731), the Coles-Terry Rural Historic District (080-5689), and the Bent Mountain Center (formerly Bent Mountain Elementary School). SEARCH will consult historical literature, maps, photographs, and other sources, including local informants as available. The following are examples of repositories that may be contacted for historic documents:

- DHR (Richmond);
- Library of Virginia (Richmond);
- Roanoke City Public Library's Virginia Room;
- Roanoke County Courthouse (Salem);
- Roanoke County Public Library's Virginia Room (Salem); and,
- Special Collections of the University Libraries at Virginia Tech (Blacksburg).

Online sources will be sought at the following:

- Newspapers.com;
- Ancestry.com; and
- Chronicling America.

## **3.0 WORK PLAN AND SCHEDULE**

As stipulated in the approved Treatment Plan, this scope of work will be implemented, and all activities related to the Treatment Plan will be completed within one year of the date of service for the Mountain Valley Pipeline project. SEARCH's proposed approach to each task relates to the implementation of the Treatment Plan and the associated timeline is detailed in Sections 3.1-3.2. Key dates are emphasized in bold and underlined text and correspond to the schedule provided as **Attachment 3**.

### **3.1 PIF FOR THE BENT MOUNTAIN RURAL HISTORIC DISTRICT (080-5677)**

#### **3.1.1 January–April 2018**

##### PIF Background Research

To support the completion of the PIF, SEARCH will conduct research adequate to describe the history of the district. The research will focus on identifying significant events, people, and families associated with it. The PIF also will include a list of all sources used to prepare the historical description. The team will consult historical literature, maps, photographs, and other sources, including local informants as available.

### **3.1.2 May–August 2018**

#### PIF Fieldwork

Following review and assessment of existing primary and secondary source materials related to the property, the team will conduct the necessary amount of survey fieldwork in order to prepare the PIF. This survey will serve to thoroughly document the properties. During fieldwork, the team will reassess both the current proposed NRHP boundary and the integrity of the contributing resources located within the potential district. The team will photograph and map contributing resources, outbuildings, and significant landscape features of the district as per National Park Service (NPS) guidelines. The PIF field survey will result in an inventory of contributing resources located within the property's boundaries, and their locations will be mapped. The purpose of the PIF background research and field survey is to complete the PIF Resource Information Sheet.

#### Preparation and Submission of PIF

The team will, based on initial research and fieldwork, prepare the draft PIF Resource Information Sheet for the Bent Mountain Rural Historic District (080-5677), and will submit by **July 1, 2018** to Mountain Valley for review prior to its submission to DHR. Following revision of the PIF Resource Information Sheet, Mountain Valley will submit the draft PIF to DHR by **July 31, 2018**. SEARCH requests that DHR provide comments on the draft PIF by **August 30, 2018**.

### **3.1.3 September–December 2018**

#### Review and Revision of PIF

Following the revision of the PIF to incorporate any comments by DHR, a revised PIF Resource Information Sheet will be submitted to Mountain Valley by **September 29, 2018**. Following the revision of the draft PIF to incorporate any requested revisions, Mountain Valley will submit the final PIF to DHR by **October 29, 2018** (Attachment 2).

## **3.2 NRHP NOMINATIONS FOR THE BENT MOUNTAIN APPLE ORCHARD RURAL HISTORIC DISTRICT (080-5731) AND THE COLES-TERRY RURAL HISTORIC DISTRICT (080-5689)**

### **3.2.1 January–April 2018**

#### Background Research

The evaluation of properties for NRHP eligibility involves an assessment of the significance of a property in terms of the history of the relevant geographical area, the history of associated historical themes or subjects, and within historical and contemporary time frame—in other words, its context. For the Bent Mountain Apple Orchard Rural Historic District (080-5731), the NRHP Nomination will include a detailed history of the district. The history will explore the people, places, events, and other forces that influenced the history of the district. In particular, the history will explore apple farming in this region of Virginia and the historical occupancy of the district. This research will serve to identify prevalent themes in the history of the district, delineate their periods of significance, and identify resources that contributed (or did not contribute) to the historical context. SEARCH will consult a variety of sources to prepare this historic context that may include historical maps, photographs, literature, property records, family histories,

agricultural censuses, farm line maps, atlases, and other sources. The team will consult local, state, institutional, and online repositories. The team will collect any previous studies of the district from DHR (Richmond). The team then will focus on local repositories. Historical ownership information will be sought at the Roanoke County Courthouse (Salem). During the course of research, the team also will identify local informants to assist in understanding the history of the district.

For the Coles-Terry Rural Historic District (080-5689), the NRHP nomination will include a detailed history of the district. The team will collect any previous studies of the district from the DHR (Richmond). The team will then will focus on local repositories. Historical ownership information will be sought at the Roanoke County Courthouse (Salem). During the course of research, the team also will identify local informants to assist in understanding the history of the district.

This research will draw on both primary and secondary sources to develop a historic context that serves as the basis for identifying significant themes, recommending a period of significance, and distinguishing between contributing and non-contributing resources within the historic district boundaries in the preparation of the nominations.

### **3.2.2 May–August 2018**

#### Background Research

During this period, SEARCH will continue to develop the historic contexts in support of the NRHP Nominations.

### **3.2.3 September–December 2018**

#### NRHP Nominations Fieldwork

Following review and assessment of existing primary and secondary source materials related to the property, the team will conduct the necessary amount of survey fieldwork in order to prepare the two nominations. This survey will serve to document the district and the properties within each. During fieldwork, the team will reassess both the current proposed NRHP boundary and the integrity of the contributing resources located within the districts. The team will photograph and map contributing resources, outbuildings, and significant landscape features of the districts as per NPS guidelines.

#### NRHP Boundary and Period of Significance Submittal

The team will, based on initial research and fieldwork, propose a NRHP Boundary and Period of Significance for the Bent Mountain Apple Orchard Rural Historic District (080-5731) and for the Coles-Terry Rural Historic District (080-5689), and will, by **September 29, 2018**, submit to Mountain Valley for review prior to its submission to DHR:

- narrative justification for recommended Period of Significance;
- narrative justification for recommended boundary;
- supporting documentation including mapping depicting the recommended boundary;

- photographs; and
- major bibliographical references used to determine the recommended boundary.

Following the revision of the NRHP Boundary and Period of Significance to incorporate any requested revisions, Mountain Valley will submit the NRHP Boundary and Period Significance to DHR by **October 29, 2018**. DHR review comments on the NRHP Boundary and Period of Significance are due by **November 28, 2019**.

### **3.2.4 January–April 2019**

#### *Revisions to NRHP Boundary and Period of Significance Submittal*

In the event that DHR requests a revised submission, SEARCH will prepare the final NRHP Boundary and Period of Significance and provide to Mountain Valley by **December 28, 2019**. Following Mountain Valley review of the revised document, the NRHP Boundary and Period of Significance will be submitted to the DHR by **January 27, 2019**. DHR review comments on the revised document are due by **February 26, 2019**.

#### *Preparation of Draft NRHP Nominations*

Subsequent to DHR review and approval of the recommended boundary, the SEARCH team will begin preparing adequate documentation for the historic districts, following all NRHP guidelines and requirements.

The team will prepare the draft nominations by **April 3, 2019**, for submission to Mountain Valley.

### **3.2.5 May–August 2019**

#### *Submission of Draft NRHP Nominations*

Following the revision of the draft nominations to incorporate any requested revisions, Mountain Valley will submit the draft nomination to DHR by **May 3, 2019**. SEARCH requests that DHR provide comments on the draft nominations (submitted to DHR by May 3, 2019) by **June 2, 2019**.

#### *Revisions to NRHP Nominations*

Although not anticipated, the schedule allows time for a second draft submission to Mountain Valley by **July 2, 2019**, for submittal to DHR by **August 1, 2019**, if, at the discretion of the DHR, it is warranted due to substantive comments.

### **3.2.6 September–December 2018**

#### *Submission of Final NRHP Nominations*

Following DHR's 30-day review period (DHR comments due **August 31, 2019**), the team will prepare the final NRHP nominations and will provide to Mountain Valley by **September 30, 2019** for submission to DHR by **October 30, 2019**, three hard copies and one digital copy (Microsoft® Office Word format) of the completed final nomination forms and all accompanying material (in appropriate formats).

#### **4.0 SUMMARY OF DELIVERABLES**

SEARCH proposes to prepare and submit the following items in conformance with all appropriate NPS and DHR guidelines, as detailed above, according to the schedule outlined in Sections 3.1-3.2 and provided as **Attachment 3**.

- *PIF for the Bent Mountain Rural Historic District (080-5677)*
  - PIF Resource Information Sheet: Three hard copies each and one electronic copy of the PIF Resource Information Sheet
  - Revised PIF Resource Information Sheet: If requested by DHR, three hard copies each and one electronic copy of the revised PIF Resource Information Sheet
  - Final PIF Resource Information Sheet: If requested by DHR, three hard copies each and one electronic copy of the final PIF Resource Information Sheet
  
- *NRHP Nominations for the Bent Mountain Apple Orchard Rural Historic District (080-5731) and the Coles-Terry Rural Historic District (080-5689)*
  - Report of Findings and Recommendations: Three hard copies each and one electronic copy each of a report of findings and recommendations (justification for NRHP Boundary and Period of Significance along with supporting documentation) to DHR for:
    - NRHP Nomination for the Bent Mountain Apple Orchard Rural Historic District (080-5731);
    - NRHP Nomination for the Coles-Terry Rural Historic District (080-5689).
  - Draft NRHP Nominations Forms: Three hard copies each and one electronic copy each of the draft nomination form to DHR for:
    - NRHP Nomination for the Bent Mountain Apple Orchard Rural Historic District (080-5731);
    - NRHP Nomination for the Coles-Terry Rural Historic District (080-5689).
  - Second Draft NRHP Nominations Forms: If requested by DHR, three hard copies each and one electronic copy each of the second draft nomination form to DHR for:
    - NRHP Nomination for the Bent Mountain Apple Orchard Rural Historic District (080-5731);
    - NRHP Nomination for the Coles-Terry Rural Historic District (080-5689).
  - Final NRHP Nomination Forms: Three hard copies each along with one editable electronic copy and a PDF copy each of a final nomination form along with all supporting documentation in the appropriate formats to DHR for:
    - NRHP Nomination for the Bent Mountain Apple Orchard Rural Historic District (080-5731);
    - NRHP Nomination for the Coles-Terry Rural Historic District (080-5689).

## **5.0 QUALIFICATIONS**

### **5.1 PRINCIPAL INVESTIGATOR (FOR PIF AND NRHP NOMINATIONS)/ARCHITECTURAL HISTORIAN: JENNA DUNHAM, MS, SEARCH**

Ms. Dunham joined SEARCH in 2014 and is responsible for conducting architectural history surveys and reports, including documentation of structures, eligibility assessments, historic research, and historic map analysis. Ms. Dunham has more than seven years of professional experience, including completion of National Register nominations, architectural documentation reports, conditions assessments, and property research. She has worked across the Northeast, California, Colorado, Michigan, and Texas. She previously worked with the Federal Emergency Management Agency (FEMA), where she completed Section 106 review for historic structures damaged in Hurricane Irene. Ms. Dunham has advanced training in Sections 106 and 110 of the NHPA, Section 4(f), and NEPA. She received her master's degree in Historic Preservation from the University of Pennsylvania in 2007, her bachelor's degree in Cultural and Historic Preservation in 2004, and completed archaeological field school in Newport, Rhode Island, in 2001. Her research specializations include New England vernacular architecture, historic cemeteries, and food preservation techniques of colonial America. Ms. Dunham's qualifications exceed those set forth by the Secretary of Interior's *Standards and Guidelines for Archeology and Historic Preservation* (48 FR 44716-42). Ms. Dunham's resume is included in **Attachment 4**.

### **5.2 ARCHITECTURAL HISTORIAN: MIKEL TRAVISANO, MS, SEARCH**

Mr. Travisano joined SEARCH in 2015 and has more than 10 years of professional experience. Mr. Travisano is responsible for directing all phases of architectural history projects. His specialties include Historic American Buildings Survey (HABS) photography, modernist architecture, archival research, historic preservation, and architectural conservation. His experience with architectural styles and historic districts ranges from some of the oldest buildings and historic districts in the United States to working with local government landmark agencies to address style, material, size, and height issues of new buildings in historic districts. He is experienced with implementing Sections 106 and 110 of the NHPA, and Section 4(f) of the DOT Act for private and public sector clients. His qualifications exceed those set forth by the Secretary of Interior's *Standards and Guidelines for Archeology and Historic Preservation* (48 FR 44716-42). He is qualified for Architectural History by the Indiana Department of Natural Resources, for Architectural Historian and Historian Field Supervisor by the Kentucky Heritage Council, and for Architectural History by the Ohio State Historic Preservation Office. Mr. Travisano has authored or co-authored more than 100 technical reports, articles, and presentations. Mr. Travisano's resume is included in **Attachment 4**.

### **5.3 LEAD HISTORIAN: TRICIA PEONE, PHD, SEARCH**

Dr. Peone has more than 10 years of experience conducting historical research and joined SEARCH in 2015 as a Historian in the Portsmouth, New Hampshire, office. Dr. Peone is responsible for historical research in archives and libraries, the development of historic contexts, analysis of historical maps and photographs, and oral history interviews. Her specialties include early American cultural history, the history of New England, and the history of science, and she has presented her research at both national and international conferences. She has conducted research at libraries and archives in the United Kingdom and throughout the northeastern United

States. Dr. Peone has experience with researching and documenting cultural resources for National and State Registers of Historic Places, HABS/Historic American Engineering Record (HAER), and Section 106 reviews. She received her doctorate in History from the University of New Hampshire in May 2015. She exceeds the qualifications for historians set forth by the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation* (48 FR 44716-42). Dr. Peone's resume is included in **Attachment 4**.

**WORK PLAN AND SCHEDULE  
FOR  
Bent Mountain (080-5677), Bent Mountain Apple Orchard (080-5731),  
and Coles-Terry (080-5689) Rural Historic Districts**

**ATTACHMENT 1**

**Correspondence**



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Molly Joseph Ward  
Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4000  
1-800-592-5482

June 20, 2017

Mr. Brian M. Clauto  
Senior Environmental Coordinator  
EQT Corporation  
555 Southpointe Blvd, Suite 200  
Canonsburg, PA 15317

Subject: Mountain Valley Pipeline LLC – Annual Standards and Specifications for Erosion & Sediment Control and Stormwater Management

Dear Mr. Clauto:

The Virginia Department of Environmental Quality (DEQ) hereby approves the Annual Standards and Specifications for Erosion & Sediment Control (ESC) and Stormwater Management (SWM) for Mountain Valley Pipeline (MVP) LLC as revised June 2017.

Please note that your approved Annual Standards and Specifications include the following requirements:

1. In addition to MVP's internal review process, the site specific ESC (9VAC25-840-40) and SWM (9VAC25-870-55) plan is required to be submitted to DEQ for review and approval;
2. ESC variance requests must be submitted to DEQ and will be reviewed in accordance with ESC (9VAC25-840-50) requirements;
3. SWM exception requests must be submitted to DEQ and will be reviewed in accordance with SWM (9VAC25-870-57) requirements;
4. The initial draft and final site specific ESC and SWM plan, and supporting documents must be posted on MVP's website for public view;
5. Inspection reports conducted by MVP as well as complaint logs and complaint responses must be submitted to DEQ in accordance with Section 2.0 General Requirements of your Annual Standards and Specifications; and
6. The following information must be submitted to DEQ at least two weeks in advance of the commencement of land-disturbing activities for each separate land disturbance construction area spread for this project. Notifications shall be sent by email to: [linearprojects@deq.virginia.gov](mailto:linearprojects@deq.virginia.gov)
  - i: Spread number;
  - ii: Spread location (including nearest intersection, latitude and longitude, access point, traversed localities);
  - iii: On-site project manager name and contact information;

MVP 002742

- iv: Responsible Land Disturber (RLD) name and contact information;
- v: DEQ-Certified ESC and SWM Inspector name and contact information;
- vi: Spread description;
- vii: Acreage of disturbance for spread; and
- viii: Spread start and finish date.

To ensure compliance with approved specifications, the Virginia Erosion and Sediment Control Law and the Virginia Stormwater Management Act, DEQ staff will conduct random site inspections, respond to complaints, and provide on-site technical assistance with specific erosion and sediment control and stormwater management measures and plan implementation. Please contact Hannah Zegler (804-698-4206) or Larry Gavan (804-698-4040) should you have any questions concerning your Annual Standard and Specifications requirements.

Sincerely,



Frederick K. Cunningham, Director  
Office of Water Permits

Cc: Michael Rolband, WSSI  
Michael Elander, WSSI  
Justin Curtis, AquaLaw  
Melanie Davenport, DEQ-CO  
Ben Leach, DEQ-CO  
Larry Gavan, DEQ-CO  
Hannah Zegler, DEQ-CO

Case Decision Information:

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have thirty days from the date of service (the date you actually received this decision or the date it was mailed to you, whichever occurred first) within which to appeal this decision by filing a notice of appeal in accordance with the Rules of the Supreme Court of Virginia with the Director, Department of Environmental Quality. In the event that this decision is served on you by mail, three days are added to that period.

**WATER AND POWER  
LAW GROUP PC**

2140 SHATTUCK AVENUE, STE. 801  
BERKELEY, CA 94704-1229  
(510) 296-5588  
(866) 407-8073 (E-FAX)

February 22, 2018

Via Electronic Filing

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
999 First Street, N.E.  
Washington, D.C. 20426

**Re: Mountain Valley Pipeline, LLC (Docket No. CP16-10-000; OEP/DG2E/G3)  
Comments and Objection re Revised Treatment Plan for Historic Properties  
within Roanoke County**

Dear Secretary Bose:

Pursuant to Stipulations III.B.5 and IV.E of the executed Programmatic Agreement regarding the Mountain Valley Pipeline Project (MVP Project), Roanoke County hereby files comments and an objection regarding the “Revised Historic Property Treatment Plan [for] Bent Mountain Rural Historic District (080-0322), Bent Mountain Apple Orchard Rural Historic District (080-5731), and Coles-Terry Rural Historic District (080-5689)” (revised Treatment Plan). The County is a consulting party for purposes of the National Historic Preservation Act (NHPA) section 106 process for the MVP Project proceeding.<sup>1</sup>

**I. Mountain Valley did not complete the consultation process provided under Stipulation III.B.5 of the Programmatic Agreement.**

Stipulation III.B.5 of the Programmatic Agreement requires Mountain Valley Pipeline, LLC (Mountain Valley) to consult with consulting parties to try to resolve objections to mitigation measures proposed by Mountain Valley in any draft Treatment Plan. On January 4, 2018, Roanoke County filed comments objecting to mitigation measures proposed in the draft Treatment Plan dated August 2017 for the rural historic districts located within the County.<sup>2</sup>

The County had to contact Mountain Valley to initiate the required further consultation. The County and Mountain Valley consulted via telephone on February 9, 2018, and early the

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<sup>1</sup> FERC, “Letter Dated February 10, 2016 Re: Mountain Valley Pipeline Project – Consulting Party Status,” eLibrary no. 20160210-30285 (Feb. 10, 2016).

<sup>2</sup> Giles and Roanoke County, “Comments Regarding Historic Property Treatment Plans,” eLibrary no. 20180104-5142 (Jan. 4, 2018).

subsequent week. County Counsel and Staff prioritized these discussions, which were productive from their perspective.

Consultation was ongoing the day Mountain Valley filed the revised Treatment Plan. Mountain Valley did not notify the County that it intended to file a revised Treatment Plan on February 15, 2018, even though they met via telephone the previous day. There was no indication that all remaining issues had been narrowed or resolved to the extent possible, or that the consultation was otherwise at an impasse.

Mountain Valley's filing of the revised Treatment Plan while consultation with Roanoke County was ongoing is inconsistent with Stipulation III.B.5. The Commission should not approve the Treatment Plan without consulting, or directing Mountain Valley to consult, with the County to try to resolve the remaining objection. County representatives stand ready to undertake and complete consultation in a timely manner.

**II. The proposed compensatory mitigation is not proportional to the MVP Project's adverse effects and does not adequately consider the input of consulting parties and local stakeholders.**

The revised Treatment Plan quotes the Virginia Department of Historic Resources' (VDHR) finding of adverse effects:

...the Bent Mountain Rural Historic District, and Coles-Terry Rural Historic District will be adversely affected by Mountain Valley bisecting them and leaving a permanent fifty-foot wide imprint on their landscapes. This condition is incompatible with the existing rural character of the districts, which derive much of their historic significance and NRHP-eligible status from that very agrarian setting and feeling the undertaking will diminish. The adverse effect to the five historic districts will require mitigation to be determined through future consultation with DHR and other stakeholders and memorialized in the Programmatic Agreement (PA) for the undertaking.<sup>3</sup>

Mountain Valley accepted this finding of adverse effect.<sup>4</sup>

The Treatment Plan states that permanent impacts will only be partially addressed by avoidance and minimization measures, and the rest will need to be mitigated.

Permanent impacts on the portions of the landscape not devoted to agriculture, and not in forest (e.g., meadows), will be avoided and/or minimized by the restoration of the pre-existing contours of the temporary and permanent rights-of-way and revegetation with native seed mixes. Permanent impacts on agricultural lands will be avoided and/or minimized by allowing the right-of-way to return to previous agricultural use following Project construction. *For the Bent Mountain Rural Historic District, this results in*

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<sup>3</sup> Revised Treatment Plan Attachment E, eLibrary no. 20180215-5004 (Feb. 15, 2018), p. 7.

<sup>4</sup> *Id.* at 8.

*approximately 8,733 feet (or 36 percent) of impacts that will either be avoided or restored. For Bent Mountain Apple Orchard Rural Historic District, this results in approximately 3,663 feet (or 37 percent). The implication of these measures for the Coles-Terry Rural Historic District is the avoidance or restoration of approximately 2,100 feet (or 14 percent of impacts).<sup>5</sup>*

The revised Treatment Plan states that Mountain Valley’s “selection of appropriate mitigation is guided by three principles: it should (1) have a nexus to the identified adverse effects of the proposed action, (2) be proportional to those effects, and (3) take consideration of the input of consulting parties and local stakeholders.”

The revised Treatment Plan proposes the following mitigation measures:

- (1) Enhanced Right-of-Way Treatment to Reduce Visibility of Permanently Maintained Corridor (section 4.2.7);
- (2) [Preliminary Information Form (PIF)] for the Bent Mountain Rural Historic District and [National Register of Historic Places (NHRP)] Nominations for the Bent Mountain Apple Orchard and Coles-Terry Rural Historic Districts (section 4.2.8); and
- (3) Preservation and Restoration of the Bent Mountain Center (section 4.2.9).

The County supports the first two measures. The first is based on the County’s comments on the draft Treatment Plan,<sup>6</sup> and the second reflects input from other consulting parties and the VDHR.<sup>7</sup> While the County generally supports the third measure, preservation and restoration of the Bent Mountain Center, it objects to Mountain Valley’s proposal to limit funding for this purpose to \$500,000 because it is not proportional to the adverse effect and does not reflect the County’s input.

Roanoke County first proposed preservation and restoration of the Bent Mountain Center as compensatory mitigation when it became clear that Mountain Valley was not willing to consider further avoidance or minimization measures. As stated in the revised Treatment Plan, the Bent Mountain Center, formerly the Bent Mountain Elementary School 080-0322, is an important cultural resource within the Bent Mountain Rural Historic District. It continues to serve as an important gathering space for this rural mountain community, which has raised

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<sup>5</sup> *Id.* at 13.

<sup>6</sup> Giles and Roanoke County, “Comments Regarding Historic Property Treatment Plans,” eLibrary no. 20180104-5142 (Jan. 4, 2018).

<sup>7</sup> Roger Kirchen, “Letter Dated November 8, 2017 Re: DHR File No. 2014-1194,” (Nov. 8, 2017).

significant concerns about the effects of the MVP Project on their way-of-life. Bent Mountain is one of the locations along the pipeline route where cultural attachment issues were raised.<sup>8</sup>

The \$500,000 in funding proposed by Mountain Valley is insufficient to keep the Bent Mountain Center open, let alone contribute to its restoration. Roanoke County provided Mountain Valley documentation that it would require approximately \$1.7 million to preserve and restore the Bent Mountain Center. Thus, the proposed \$500,000 in funding will not accomplish the objective of mitigating the MVP Project's adverse effects on the "very agrarian setting and feeling" of the rural historic districts. As described, most of the permanent adverse effects associated with the pipeline bisecting the three rural historic districts in Roanoke County will not be addressed by avoidance or minimization measures. Requiring Mountain Valley to provide the funding needed to preserve and restore the Bent Mountain Center is proportional to the adverse effect of the pipeline bisecting these rural historic districts.

Mountain Valley has suggested that Roanoke County could seek additional funding from the Historic Resources Mitigation Fund, an endowment for grant making purposes created by the Memorandum of Agreement for Historic Resource Mitigation of Virginia Resource Impacts of Mountain Valley Pipeline" (Dec. 22, 2017) (Historic Resources Mitigation Fund). The County disagrees with the suggestion that the Commission can rely on the endowment, which is based on an agreement between Mountain Valley and Commonwealth of Virginia, over which the Commission does not have authority, to mitigate project impacts on historic properties in Roanoke County. Reliance on this fund would be further mis-placed given that the endowment has not yet been established, and procedures for applying for and criteria for allocating funding have not been established.

### **CONCLUSION**

In conclusion, the County requests that the Commission not approve the revised Treatment Plan, and instead undertake further consultation with the County, or direct Mountain Valley to undertake such consultation, in order to resolve the remaining objection to the compensatory mitigation proposal.

Respectfully submitted,



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Richard Roos-Collins  
Julie Gantenbein  
WATER AND POWER LAW GROUP PC

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<sup>8</sup> See Preserve Bent Mountain, "Summary of Poor and Bent Mountain History and Cultural Attachment," eLibrary no. 20161222-5151 (Dec. 22, 2016); see also James A. Kent, MA, JD, *The Scientific Validity of Cultural Attachment as a Social Phenomenon and the Basis for an "All Lands" Approach in NEPA Decisionmaking*, eLibrary no. 20151023-5124, (Oct. 23, 2015).

Kimberly D. Bose  
February 22, 2018  
Page 5

Cc:  
John Eddins, Advisory Council on Historic Preservation  
Roger Kirchen, Virginia Department of Historic Resources  
Service List for CP16-10

March 2, 2018

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
999 First St. N.E.  
Washington, DC 20426

Subject: Response to Revised Historic Property Treatment Plan for the Bent Mountain Rural Historic District (080-0322), Bent Mountain Apple Orchard Rural Historic District (080-5731), and Coles-Terry Rural Historic District (080-5689) (accession # 20180215-5004)

Dear Ms. Bose,

This letter is offered in Response to Mountain Valley Pipeline, LLC (“MVP”)’s Revised Historic Property Treatment Plan for the Bent Mountain Rural Historic District (080-0322), Bent Mountain Apple Orchard Rural Historic District (080-5731), and Coles-Terry Rural Historic District (080-5689) (“Treatment Plan”). The plan was attached to a February 14, 2018 letter from Brian Clauto, Senior Environmental Coordinator, Mountain Valley Pipeline, LLC, addressed to me and delivered via Fed Ex. It was also published on [ferc.gov](http://ferc.gov) as part of a larger document assigned FERC accession # 20180215-5004.

This letter consists of a critique of the Section 106 process for the Mountain Valley Pipeline (“MVP pipeline”), followed by comments on individual portions of the Treatment Plan.

## **CRITIQUE OF THE SECTION 106 PROCESS FOR THE MVP PIPELINE**

### ***MVP’s Section 106 process = “avoidance of avoidance”***

The Section 106 process for the MVP pipeline has sidestepped the vast majority of opportunities to consult with the public to work out mutually agreeable arrangements for avoidance of impacts to historic resources.

In his letter to FERC of November 3, 2017, Richard Caywood, Assistant County Administrator, Roanoke County, discusses MVP’s failure to consider avoidance as a strategy for reducing impacts to historic resources in the path of the MVP pipeline. Said Mr. Caywood:

Since the beginning of its working relationship with Mountain Valley Pipeline (MVP), Roanoke County has indicated interest in the Section 106 process and the evaluation of historic resources along the proposed route. Roanoke County formally requested Consulting Party status on June 30, 2015, and was recognized as a Section 106 Consulting Party by the Federal Energy Regulatory Commission on February 10, 2016. Despite the County's Consulting Party Status and engagement in the Section 106 process, the Mountain Valley Pipeline Company did not make any efforts to consult with the County until the County reached out to MVP to indicate that the required consultation was not occurring. Despite our high visibility on the project and our Consulting Party Status, the first consultation call did not take place until today. Therefore, we were not consulted with until much of

the Section 106 work was completed, including the creation of the *MVP VA Criteria of Effects Report; MVP Phase I Reconnaissance Archaeological Survey, Roanoke County, VA; MVP VA Treatment Plans* and other reports.

Our staff have been unable to find evidence supporting the claim MVP worked to find reasonable alternatives to the proposed route, which would avoid historic districts and sites. The proposed route bisects three NRHP-eligible historic districts and adversely impacts multiple NRHP-eligible sites, including prehistoric archaeological sites. In the *Phase II Archaeological Evaluation Report of Sites 44RN0400 and 44RN0401*, MVP declares that its consultants "conducted Phase I surveys for a potential avoidance route around the two sites," but it "cannot avoid impacts on the two NRHP-eligible sites." There is no further discussion of the avoidance evaluation, nothing to describe the location of any alternatives examined and no details on the findings of these evaluations. It appears MVP's argument is that avoidance through route realignment is not possible due to the project's schedule. It is Roanoke County's understanding Section 106 requires MVP to examine reasonable alternatives which avoid impact to historic resources and provide information about why they cannot be avoided. Under "Background of Investigations" in *Phase II Archaeological Evaluation Report of Sites 44RN0400 and 44RN0401*, MVP stated that they: " ... Had determined that impacts on Sites 44RN0400 and 44RN0401 might be minimized by minor route shifts, but could not be totally avoided, and given that landowner permission to access the property for Phase II evaluation was tenuous, MVP determined that it would treat [sites] as NRHP-eligible and developed Treatment Plans (Data Recovery Plans) for each site to mitigate for adverse effects." Based on the information received, MVP has not taken the necessary steps to ensure surveying occurs in a timely manner to adjust the pipeline's proposed route upon the discovery of these sites and therefore prevent adverse impacts to historic sites and districts. We do not believe that Section 106 permits impacts to protected resources simply because the analysis of reasonable alternates may have an effect on the project schedule. . . .

**It is Roanoke County's opinion that MVP has just today begun its consultation efforts as part of the Section 106 process and require further documentation of the avoidance analysis before mitigation discussions can occur. We do not believe that appropriate or sufficient consultation has taken place as envisioned under Section 106, nor that the issuance of a Programmatic Agreement is appropriate at this time.** [emphasis added] Roanoke County has requested an extension of the 15 day comment period on the PA that was offered by FERC in order to consult with our Board. We anticipate offering additional comment in the near future.

Through engagement in the Section 106 process for the MVP pipeline, my colleagues in Preserve Roanoke and I have observed a consistent pattern of MVP's failure to consider avoidance, which corroborates statements made in Mr. Caywood's letter of November 3. In all cases, the MVP project schedule appears to take precedence over the consideration of avoidance. The following examples are provided as illustration, and are not intended to be inclusive of all the instances of MVP's "avoidance of avoidance":

**1) Historic orchard roads inside the Bent Mountain Orchard Rural Historic District (BMORHD)**

The presence of a network of historic orchard roads inside the area contained within the Bent Mountain Rural Historic District and the Bent Mountain Orchard Rural Historic District was first brought to MVP's attention in Preserve Roanoke's comments to the Final Environmental Impact Statement for the MVP pipeline submitted on September 8, 2017 (accession # 20170908-5122). One of these orchard roads, Green Hollow Drive, has been identified by MVP as a pipeline access road, and has also been named a contributing resource inside the Bent Mountain Orchard Rural Historic District by VDHR. Preserve Roanoke's most recent communication with FERC and MVP on this topic is documented in **Attachment 1**, Preserve Roanoke's letter to FERC of January 30, 2018 (accession # 20180130-5205). As communicated in that letter, using Green Hollow Drive as a pipeline access road will destroy its historic integrity. The residents inside the Bent Mountain Orchard Rural Historic Districts are quite distressed that the use of Green Hollow Drive as a pipeline access road, combined with pipeline construction, will forever alter the district's physical appearance and destroy any hope of retaining the district's historic integrity.

Please see *Photo 1*, below, which illustrates the transformation that occurs to rural roads when they are utilized as access roads for pipeline construction. They are forever transformed from picturesque country lanes to grossly-impacted and damaged industrial sites as a result of repeated use in the transport of extraordinarily heavy pipeline construction equipment and materials.

MVP's offer to pay for National Register nomination of the Bent Mountain Orchard Rural Historic District does not mitigate for anticipated damages resulting from pipeline construction through the district, which will more than likely to destroy forever its historic integrity. Of course, we won't know with certainty the extent of damage resulting from pipeline construction and the use of Green Hollow Drive as a pipeline access road until after pipeline construction has occurred, at which time it will be too late to do anything about it.

MVP and FERC have had nearly six months in which to engage in outreach and consultation with the affected landowners inside the two districts. Instead of conducting the outreach and consultation as mandated in Section 106, MVP and FERC have chosen to ignore the historic orchard roads completely, as documented in **Attachment 1**.

MVP and FERC's silence on the issue of the orchard roads inside the Bent Mountain Rural Historic District and the Bent Mountain Orchard Rural Historic District for the past six months, including even their failure to acknowledge Preserve Roanoke's repeated and explicit communications on the subject, represents an abrogation of their responsibilities to consider project impacts and avoidance as delineated under 300 CFR 800.

## 2) **Henry-Waldron Cemetery inside the Coles-Terry Rural Historic District**

On September, 21, 2017, Roger Kirchen, Virginia Department of Historic Resources, wrote to Megan Neylon, MVP, a letter titled, "Re: Mountain Valley Pipeline Project, Phase I Survey Supplemental Information and Criteria of Effects Report: Addendum 2, Montgomery and

Roanoke Counties, Virginia (June 2017) DHR File No. 2014-1194; FERC #CP16-10". The letter discusses impacts to the Henry-Waldron Cemetery (DHR ID #080-5690). Said Roger Kirchen:

The Henry-Waldron Cemetery is eligible for listing in the NRHP as a contributing element to the Coles-Terry Rural Historic District (DHR ID #080-5689). In our letter dated July 7, 2017, DHR disagreed with the consultant's recommendation that the pipeline project will not adversely affect the Coles-Terry Rural Historic District. In that previous correspondence we stated that the pipeline will have a direct adverse effect on the rural historic district as it will physically bisect the Coles Terry Rural Historic District. The "Dominant" viewshed of the pipeline project from the Henry-Waldron Cemetery is due to the fact that an associated access road and permanent workspace will be constructed only fourteen feet from the historic cemetery. . . . The DHR believes that the construction of the new roadway and permanent workspace so close to the cemetery is inconsistent with its rural character and will greatly alter the property's setting and feeling. We, therefore, disagree with the consultant's recommendations and find that the pipeline project will adversely affect the Henry-Waldron Cemetery.

The problems with the routing of the MVP pipeline in the vicinity of the Henry-Waldron Cemetery fall into two categories, one having to do with the pipeline itself and one, the pipeline access road. We discuss each, as follows:

(a) Problems with the re-routing of the MVP pipeline to avoid the Henry-Waldron Cemetery, as discussed in MVP's "Phase I Survey Supplemental Information and Criteria of Effects Report: Addendum 2, Montgomery and Roanoke Counties, Virginia", issued June, 2017

The document cited above proposes to re-route the MVP pipeline to avoid the Henry-Waldron Cemetery. However, the pipeline now runs near an area that has historic significance as a mid-20<sup>th</sup> century water bottling plant. The water bottling facility, founded by Bradford Holt Willard, operated under the business name "Blue Ridge Mountain Spring Water Company" from 1954 until 1970. The company delivered water to individual customers on a biweekly basis, at a cost of \$0.75 per 5-gallon bottle. The bottles were returned to the company for sterilization and reuse. The spring upon which the bottling plant was built starts on the property containing the Henry-Waldron Cemetery and feeds into Bottom Creek. A cabin has been constructed over the facility that the company used to collect and bottle water. This cabin is one of two above-ground sites that are remnants of the water bottling operation. A scanned copy of pages from a marketing brochure for the bottling plant appears in **Attachment 2**.

The remnants of the Blue Ridge Mountain Spring Water bottling plant should be assessed as an area of special historic significance inside the Coles-Terry Rural Historic District.

The June, 2017 avoidance route for the MVP pipeline transects an area near the extant above- and below-ground remnants of the bottling plant, as well as the spring and stream that fed the historic bottling plant. These are significant manmade and landscape/topographic features

inside the Coles-Terry Rural Historic District that must be taken into consideration in the interest of avoidance in the planning of the MVP pipeline.

(b) Problems with plans to mitigate impacts of the MVP pipeline access road that runs adjacent to the Henry-Waldron Cemetery, as described in the Revised Treatment Plan (FERC accession # 20180515)

The Revised Treatment Plan (FERC accession # 20180215-5004) offers the following amendments to the MVP pipeline project in an effort to minimize impacts to the Henry-Waldron Cemetery:

- ✓ use an existing 8-foot-wide dirt road running along the northwestern boundary of the Henry-Waldron Cemetery to create a permanent 8-foot-wide access road surfaced with gravel
- ✓ reduce the access road limits of disturbance (LOD) from the standard 50 feet to 25 feet in width while passing the cemetery to avoid direct impacts
- ✓ narrow the limits of disturbance (LOD) of this access road to provide an approximately 11-foot-wide buffer between the cemetery and the LOD
- ✓ install protective fencing along the boundary of the cemetery, which coincides with the boundary of the 25-foot wide LOD of the access road.

Problems with the avoidance plan for the Henry-Waldron Cemetery include:

- ✓ VDHR has recommended further study on the Henry-Waldron Cemetery, to ascertain whether the current cemetery boundary is large enough. This VDHR recommendation was made in April, 2016 by VDHR in its Architectural Survey Form DHR ID: 080-5690 and DHR ID: 080-5689, which states: *“Like many old cemeteries in rural areas, it is difficult to use existing surface evidence to provide a definitive number of graves. Unmarked graves, graves with markers that have fallen and graves once marked only with impermanent, wood markers contribute to the difficulty in estimating the number of graves and the internal structure of the cemetery. Furthermore, the cemetery is in a young deciduous-pine forest that was likely logged and cleared in the recent past. The possibility exists that historic and modern land use practices, such as deforestation and repeated logging, may have caused disturbance to the cemetery surface. For this reason, the property owner recently retained a professional land surveyor to mark corners of the cemetery that encompass the graves with readily observable surface evidence along with a buffer to protect possible graves without any apparent surface evidence. Continued archaeological survey of this cemetery is recommended. Unobtrusive, geophysical survey methods augmented with limited archaeological verification of subsurface anomalies should enable a more reliable estimate of the number of graves, their internal structure within the cemetery and the overall boundaries of the cemetery. Full archaeological investigations are necessary if an exact characterization of the cemetery is desired.”*
- ✓ Until the VDHR-recommended survey of the Henry-Waldron Cemetery is performed, it is impossible for MVP to make any claims as to the anticipated success of avoidance of this cemetery by narrowing the LOD of the MVP pipeline access road.

- ✓ The use of a country road as a pipeline access road will transform the road from an idyllic country lane into a high-impact industrial site, due to the repeated use of the road to transport very heavy equipment and pipeline construction materials. Please see *Photo #1*, below, of a pipeline access road associated with the construction of the Stonewall Gathering Pipeline in West Virginia. I took this photo in July, 2015 while touring the Stonewall Gathering Pipeline construction sites with a group of local women.

This photo illustrates the specious nature of MVP's claim that it will mitigate impact to the Henry-Waldron cemetery by somehow limiting the LOD from 50 feet to 25 feet. Even if MVP's construction contractor, Precision Pipeline, should manage to limit the disturbance to 25 feet in width in the course of pipeline construction -- which is a dubious claim all by itself -- there is nothing they can do to prevent or mitigate the impact to the local road system of the extraordinarily heavy equipment that is used in pipeline construction.



*Photo#1: rural road in West Virginia used as pipeline access road during the construction phase of the Stonewall Gathering Pipeline; photo taken July, 2015 (source: Ann Rogers)*

Problems with the proposed amendments to minimize and avoid impacts to the Henry-Waldron Cemetery require another round of consultation with VDHR and the affected landowners to resolve these problems. However, it appears that the needed consultations are unlikely to occur due to the project schedule. As of this writing, MVP has begun tree felling in the Blue Ridge Parkway. All hopes of continuing consultation with MVP to resolve adverse impacts to the Henry-Waldron Cemetery and the nearby water bottling plant site are growing increasingly dim. Section 106 for the MVP pipeline is fast becoming “history”.

### 3) Headwaters of the Roanoke River

The MVP pipeline will cross the headwaters of the South Fork of the Roanoke River at Bottom Creek, at a location within the Coles-Terry Rural Historic District. The headwaters formed by Bottom Creek and Laurel Creek are written about in histories of Bent Mountain. One such history was written by Grace Fortescue Terry, whose father was one of the founders of the 19<sup>th</sup> century settlement comprising the Coles-Terry Rural Historic District. Her manuscript was issued in typewritten format in 1957 and later revised and published in an article titled “Recollections of Bent Mountain, Virginia” in the Journal of the Roanoke Historical Society, Winter, 1967. Said Terry's history of Bent Mountain:

Following the beginnings of Roanoke River, it is indeed so circuitous that when it passes Shawsville and makes a sharp right turn, it seems to be “aiming” to return to the place of its birth on the east side of Poore Mountain, where several deep hollows – clefts in the range – cool little springs appear among mossed rocks and fern fronds, and in springtime, columbines, windflowers and ethereal violets and bright cerise of Adder's tongue. Down they wander, collecting companions on the way, merging with more and more spring branches. Rivulets, with whispering infant voices, turning slowly northward, grow and mature into “Bottom's Creek”, and its cascading becomes a staccato chorus, that hurries to join forces with another liquid traveller from Bent Mountain's Eastern border, for an interlude of tranquility, traversing swamps and meadows, until encountering a blockage of rocks and a sharp obstruction of hills, it gathers force and rises in mimic rage to pour into a gorge where it was later harnessed to give power to operate the first “Bent Mill”, and from that useful development comes its present name, “Mill Creek”.

Returning to Street's Entry, we find other springs beginning in a higher cut or bowl of rocks, seeking companionship below in the seaward adventuring through twilight shadows of hemlock, their gothic spires pointing heavenward – their roots anchored in mosses and ferns, and shaded by barricades of Rhododendron and Laurel – thus, “Laurel Creek” emerges and plunges in rapids downward to join Bottom and Mill Creek. Then, spectacularly, dramatically, it hurls itself hundreds of feet, fiercely through a great rock-walled gorge, several miles of tumult, to presently grow calm and become a placid river, passing “Hot” or Crockett Springs, on past Allegheny Springs to Shawsville. There it sharply reverses its course and almost completes a circle to pass Big Spring and Elliston, as Roanoke River, at the foot of Poore Mountain, where its infantile venture began.

What an odyssey to follow it to its terminus in Albemarle Sound! An epic of the soul of many waters that fulfill their migratory destiny and final union with the “Ocean of Eternity”.

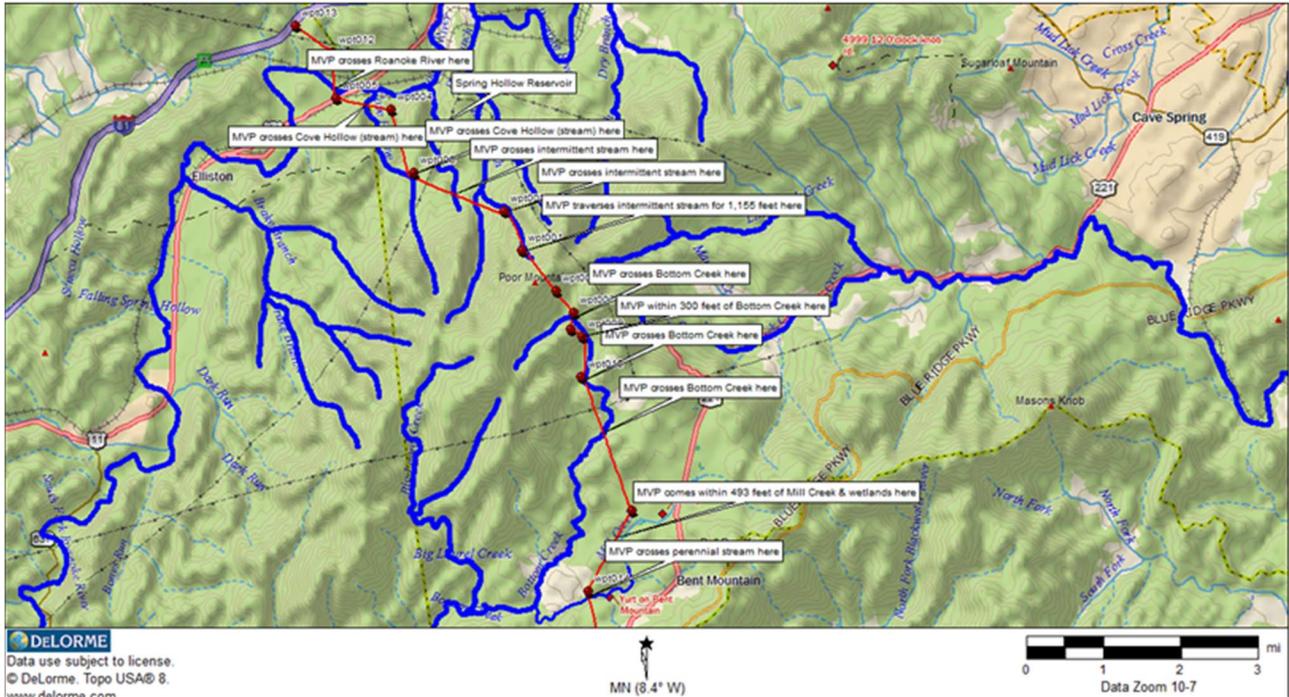
Another history of Poor Mountain was written by Lee Pendleton in 1976 while he was a patient at the Salem Veterans Affairs Medical Center in Salem, VA. Here is an excerpt of Pendleton's description of a recreational expedition taken by a small group of local youth to the top of Poor Mountain, organized by an individual named “Daddy Mack”. The group were riding mules and on foot. Pendleton describes what they saw, including the springs of Laurel Creek and the upland portion of Bottom Creek, which are all inside the Coles-Terry Rural Historic District:

He [Mr. Barnett] showed them the spring gushing out of the top of the mountain, freestone, head of Laurel Creek. Barnett had fenced in the spring, but Coles Terry who had as much land as Barnett on the other side, sued Barnett and both sides had surveys made (have seen Barnett's map), but before it came to trial, Barnett died with cancer and told his boys to drop the suit. Its a wonderful thing how this water gushes up on top of the mountain. It was a little early for lunch, but they were hungry and water handy, so they took the mules out and gave them water and corn and let them eat hay out of the wagon. The mules securely tied, they walked out to the west where there is a fire tower now. A little farther and they could have seen Bottom Creek plunging several hundred feet down the mountain near the present girls' camp. . . .

Yet another history, a book titled *History of Roanoke County* (George S. Jack, 1912), includes in its chapter on Bent Mountain the following description:

After ascending the mountain a beautiful plateau, practically level, stretches out for miles. The land is well watered by streams and branches flowing from innumerable springs of free-stone water, almost ice cold. Situated some two thousand seven hundred feet above sea level, there is always a delightful breeze in the hottest summer weather and blankets are in demand for sleeping purposes at all seasons of the year.

The headwaters of the South Fork of the Roanoke River can be seen, in the excerpts of histories of Bent and Poor Mountain quoted above, to play an integral role in the history of Poor Mountain and the integrity of the Coles-Terry Rural Historic District. The MVP pipeline crosses through the area of springs and first order streams described in the Terry narrative, and crosses Bottom Creek four times. Please see map, below, illustrating that the MVP pipeline would cross mapped Waters of the U.S. 13 times near the origin of the South Fork of the Roanoke River, much of this inside the Coles-Terry Rural Historic District. How many unmapped, unnamed tributaries and streams that do not appear on a topographic map are crossed?



*Map #1: MVP pipeline's crossing of the headwater streams at the origin of the South Fork of the Roanoke River*

Construction of the MVP through the exquisitely pristine, irreplaceable headwaters of the Roanoke River would undermine the very bedrock of Roanoke County and southwestern Virginia's cherished historic landscapes.

MVP and FERC have failed to consider avoidance of impacts to these historically significant landscape/topographic features inside the Coles-Terry Rural Historic District, in spite of having received notification of these impacts as early as Preserve Roanoke's comments to the Draft Environmental Impact Statement for the MVP pipeline submitted in December, 2016 (accession # 20161221-5427 and 20161221-5276). In the ensuing 2+ years, FERC has pursued a Section 106 program that has conveniently ignored the presence and significance of landscape and topographic features inside rural historic districts, such as the headwaters of the Roanoke River. I discuss this problem in more detail, below.

In January, 2018, consulting party status was given to four members of the Terry family whose properties comprise the majority of the land parcels inside the Coles-Terry Rural Historic District, including the headwaters of the Roanoke River. These newly approved consulting parties are poised to advocate for the preservation of the Roanoke River headwaters written about so eloquently by Roanoke County historians.

It is highly unlikely that consultations with the Terry family consulting parties will occur. The project schedule, under FERC's Section 106 process for the MVP pipeline, will not allow it.

### ***Failure to involve consulting parties***

The filing to FERC issued by Giles and Roanoke Counties on August 2, 2017 decries FERC's consistent failure to involve them as consulting parties in the Section 106 process for the MVP. Says the Roanoke/Giles County filing:

Giles and Roanoke Counties, Virginia (collectively, Counties) write to request that the Federal Energy Regulatory Commission (Commission) undertake direct consultation with the Counties prior to making findings and determinations regarding the potential impacts of the Mountain Valley Pipeline Project (MVP Project), as required by Section 106 of the National Historic Preservation Act (NHPA) and implementing regulations.

The Commission's Office of Energy Projects (OEP) Staff has not consulted directly with the Counties regarding the MVP Project's potential impacts on historic resources located within either county, or measures to avoid or mitigate those impacts.

The Counties separately requested and were granted consulting party status for purposes of the Section 106 process. Despite their consulting party status, OEP Staff has not consulted them regarding any proposed findings or determinations during the Section 106 process, and has not contacted the Counties to schedule consultation meetings in the future. Except for having been sent excerpts from the Phase IA archeological survey report and architectural survey reports that specifically addressed their respective jurisdictions from Mountain Valley Pipeline, LLC (Mountain Valley), the Counties have been treated the same as any other party to the certificate proceeding.

It is not clear on the face of the Final Environmental Impact Statement (FEIS) whether the Commission intends to undertake direct consultation with the Counties or any consulting parties in advance of its final decision on issuance of a certificate. This does not comply with the letter or intent of the NHPA and implementing regulations, which provide a specific role for local governments in the Section 106 process.

Please see also discussion of Roanoke County's attempts at consulting with MVP discussed on pages 1 and 2 of this letter.

MVP did eventually hold a series of conference calls with Roanoke County staff during the first week of February, 2018. The final call in this series occurred on the same date as the issuance of the Revised Treatment Plan (accession #20180215-5004). This sequence of events is described in Water and Power Law Group's filing to FERC dated February 22, 2018.

Please note also the December 21, 2016 letter to FERC from Roger Kirchen, Virginia Department of Historic Resources, stating:

We understand that FERC has denied numerous requests from stakeholder groups to participate in the Section 106 process as consulting parties stating that existing procedures allow for comments on cultural resources without granting consulting party status (DEIS, Section

4.10.2.1). DHR has concerns about this approach and questions whether the public comment process within NEPA sufficiently satisfies FERC's responsibilities under Section 106. Specifically, FERC has denied access by potential consulting parties to the cultural resource studies that pertain directly to the resources of concern to those parties. Although we recognize the potential sensitivity of these studies and thank FERC for its careful handling of these reports, DHR has voluntarily offered to provide the studies to potential consulting parties so that they may be fully informed on FERC's efforts to identify historic properties. It is our opinion that FERC should reconsider its decisions regarding the inclusion of consulting parties so that the Section 106 process may proceed with the benefit of input from those who best understand the affected historic properties.

A collection of refusal letters sent by FERC in 2016 to organizations who had requested Consulting Party status from FERC for the Section 106 process for the MVP is available at:

<https://app.box.com/s/movtj5dzlhrx3s9zsaofbwxkoqe8jv9q>. It is remarkable that even well-established preservation organizations such as Preservation Virginia and the Roanoke Valley Preservation Foundation were refused consulting party status by FERC.

Now that tree felling has begun, the Section 106 process for the MVP pipeline is a *fait accompli*. FERC's success in achieving a near absence of consulting parties in the Section 106 process for the MVP pipeline can be predicted to set precedent among federal and state agencies charged with Section 106 compliance for how best to sidestep the values and concerns of the preservation community and affected landowners. FERC's legacy will be in its mastery of the "fast track" methodology for project review and compliance under Section 106 regulation.

### ***Rural historic districts do not = traditional cultural properties***

The attempt to create analogy between rural historic districts and traditional cultural properties appears in three of MVP's filings:

--May 10, 2017 Criteria of Effects Report (accession # 20170511-5018)

--August 25, 2017 HISTORIC PROPERTY TREATMENT PLAN for the Bent Mountain Rural Historic District (080-0322) and the Coles-Terry Rural Historic District (080-5689) (accession # 20170828-5002 32364188)

--February 14, 2018 Revised Treatment Plan (accession # 20180215-5004)

The assumption of equivalency between a rural historic district and a traditional cultural property is used by MVP and its cultural resources contractor, Tetra Tech, to assess impacts of the Mountain Valley Pipeline to rural historic districts in Virginia on the basis of whether and how much those impacts affect the ways in which the land inside the districts is used. The three documents cited above analyze the MVP pipeline's impacts to landscape and topographic features within six rural historic districts in Virginia on the basis of whether the pipeline's presence would affect the "use" of the land within the districts.

Below we describe how MVP's analysis of "use" is employed as a substitute for consideration of actual physical impacts to landscape and topographic features inside Virginia's rural historic districts. In the documents cited above, MVP considers aspects of land use within the Bent Mountain Rural Historic District and the Coles-Terry Rural Historic District as if these districts were traditional cultural

properties. In this vein, MVP considers historic vs. contemporary land use as orchards, and historic vs. contemporary land use in logging. Also, MVP considers whether and to what extent the presence of the Mountain Valley Pipeline would impair an observer's ability to distinguish areas historically used for agriculture and those historically in evergreen forest or deciduous forest.

The February 14, 2018 Treatment Plan summarizes MVP/Tetra Tech's approach to analysis of "use", saying, "Mountain Valley recommended that the Bent Mountain Rural Historic District . . . would continue to reflect its varying **land uses** through intact historic landscape features; the project would not affect the district's **continuity of use.**" And, "Mountain Valley further recommended that the Coles-Terry Rural Historic District . . . would continue to reflect its varying **land uses** through intact historic landscape features; the project would not affect its **continuity of use.**" (emphasis added)

The operative word here is "use".

The problem with MVP/Tetra Tech's attempt to establish equivalence between rural historic districts and traditional cultural properties, and the subsequent employment of the concept of "land use" as a guiding principal in assessing the MVP pipeline's impacts to rural historic districts, is that rural historic districts do not share with traditional cultural properties a dependence on land use as a criterion for eligibility determination.

National Register Bulletin 38, **Guidelines for Evaluating and Documenting Traditional Cultural Properties**, states in the section titled "Period of significance":

Describing the period of significance for a traditional cultural property can be an intellectual challenge, particularly where the traditions of a Native American or Micronesian group are involved. In such cases there are often two different kinds of "periods." One of these is the period in which, in tradition, the property gained its significance--the period during which the Cahuilla people emerged from the lower world through Tahquitz Canyon, or the period when civilization came to Truk through the magical arrival of the culture-bearer Sowukachaw on Mt. Tonaachaw. Such periods often have no fixed referent in time as it is ordinarily construed by Euroamerican scholarship (except, perhaps, by some of the more esoteric subfields of cosmology and quantum mechanics). To the Cahuilla, their ancestors simply emerged from the lower world at the beginning of human life on earth, whenever that may have been. A Trukese traditional authority will typically say simply that Sowukachaw came to Truk "nċċmw nċċmw nċċmw" (long, long ago). It is usually fruitless, and of little or no relevance to the eligibility of the property involved for inclusion in the National Register, to try to relate this sort of traditional time to time as measured by Euroamerican history. Traditional "periods" should be defined in their own terms. If a traditional group says a property was created at the dawn of time, this should be reported in the nomination or eligibility documentation; for purposes of National Register eligibility there is no need to try to establish whether, according to Euroamerican scholarship or radiocarbon age determination, it really was created at the dawn of time.

The second period that is often relevant to a traditional property is its period of use for traditional purposes. Although direct, physical evidence for such use at particular periods in the past may be rare in the case of properties used by Native American groups, it is usually possible to fix a period of use, at least in part, in ordinary chronological time. Establishing the period of use often involves the weighing of indirect evidence and inference. Interviews with traditional cultural authorities are usually the main sources of data, sometimes, supplemented by the study of historical accounts or by archeological investigations. Based on such sources of data it should be possible at least to reach supportable inferences about whether generations before the present one have used a property for traditional purposes, suggesting that it was used for such purposes more than fifty years ago. It is seldom possible to determine when the traditional use of property began, however--this tends to be lost, as it were, in the mists of antiquity.

. . . The length of time a property has been used for some kinds of traditional purposes may be difficult to establish objectively. Many cultural uses may have left little or no physical evidence, and may not have been noted by ethnographers or early visitors to the area. Some such uses are explicitly kept from outsiders by members of the group ascribing significance to the property. Indirect evidence and inference must be weighed carefully, by or in consultation with trained ethnographers, ethnohistorians, and other specialists, and professional judgments made that represent one's best, good-faith interpretation of the available data.

Consideration of when and how land has been used for traditional purposes, as discussed in Bulletin 38, is integral to the assessment of traditional cultural properties, without which it is impossible to identify period of significance or historic eligibility for those properties. However, National Register Bulletin 30, **Guidelines for Evaluating and Documenting Rural Historic Landscapes**, offers an entirely different set of criteria to use in determining period of historic significance and eligibility. (Please note that a rural historic district is a type of rural historic landscape that contains buildings and/or structures.) In dealing with these questions, Bulletin 30 focuses almost exclusively on the appearance of the land within the district, not present or past uses.

For the Traditional Cultural Property, the guiding principal in determining eligibility is whether the land was used in a specific cultural context at least 50 years ago. For the Rural Historic District, the important question is whether the land currently looks like it did at least 50 years ago. The two approaches are distinct and cannot be considered interchangeable.

Says Bulletin 30, "For the purposes of the National Register, a rural historic landscape is defined as a geographical area that historically has been used by people, or shaped or modified by human activity, occupancy, or intervention, and that possesses a significant concentration, linkage, or continuity of areas of land use, vegetation, buildings and structures, roads and waterways, and natural features." Here we see an emphasis on the appearance of the landscape/district that harkens to a bygone era of "human activity, occupancy, or intervention," not on an assessment of whether the district/landscape reflects past or present usage in a specific cultural context.

Bulletin 30 deals with the interactions between humans and the natural environment within rural historic districts. This interaction is described in terms of physical patterns of historic land use, not

evidence of continuous use within a traditional cultural context. Says Bulletin 30: “Spatial organization, concentration of historic characteristics, and evidence of the historic period of development distinguish a rural historic landscape from its immediate surroundings. In most instances, the natural environment has influenced the character and composition of a rural area, as well as the ways that people have used the land. In turn, people, through traditions, tastes, technologies, and activities, have consciously and unconsciously modified the natural environment. Politics, social customs, ownership, economics, and natural resources have determined the organization of rural communities and the historic properties they contain.”

This consideration of the differences between traditional cultural properties and rural historic districts demonstrates that they are two distinct entities within the realm of historic preservation. The singular importance to the traditional cultural property of land use within a continuing cultural context does not apply to the rural historic district. For this reason, MVP/Tetra Tech’s pervasive focus on past and contemporary land use in its assessment of the Mountain Valley Pipeline’s impacts to rural historic districts in Virginia is misguided and misleading, especially considering that a rationale for considering the historic districts as equivalent to traditional cultural properties is nowhere presented.

The pervasive, unsubstantiated focus on the equivalence of rural historic districts and traditional cultural properties in the above-cited documents sidesteps consideration of genuinely adverse on-the-ground impacts that would result from building the pipeline through Virginia’s rural historic districts.

### ***No precedent for non-native traditional cultural properties***

The following are excerpts from a June, 2004 phone call with Martha Catlin, Advisory Council on Historic Preservation, conducted in the process of seeking traditional cultural property status for a non-Native American farming community in southwestern Virginia. Said Ms. Catlin:

- There is no precedent in Virginia for a traditional cultural property composed of non-Native American communities.
- The National Register of Historic Places told Ms. Catlin that there is no precedent for a non-Native American traditional cultural property anywhere in the U.S.
- The traditional cultural property concept came about to recognize claims made by Native Americans.
- The National Register of Historic Places is heavily weighted toward traditional cultural properties that are significant to Native Americans.
- The National Register ruling on traditional cultural properties was written, in part, to keep from running afoul of other laws protecting Native Americans.
- Federal agencies had a “trust responsibility” regarding Native American tribes. If in doubt, they erred on the side of Native Americans. This is one reason why a non-Native American traditional cultural property has not been seen before.

In light of the lack of precedent in Virginia or the U.S. for the approval of non-Native American traditional cultural properties, it is imperative that MVP seek eligibility determination as traditional cultural properties for all the rural historic districts in Virginia to which it applies the criterion of “land use” as a substitute for consideration of material impacts to landscape and topographic features.

Unless and until MVP can substantiate through VDHR or the Keeper of the National Register that the rural historic districts crossed by the MVP in Virginia are also eligible as traditional cultural properties, the three documents cited above must be rewritten to correct the skewed assessment of impacts to Virginia's rural historic districts therein.

Unless and until the rural historic districts are approved by VDHR or the Keeper to be eligible as traditional cultural properties, MVP's continuing use of the idea of "land use" as a criterion for assessing pipeline impacts to the districts allows us to conclude that MVP is substituting (a) consideration of continuity of land use for (b) consideration of physical, on-the-ground impacts of pipeline construction. This misleading approach must be corrected through MVP's issuance of corrected versions of the three documents discussed herein, including:

--May 10, 2017 Criteria of Effects Report (accession # 20170511-5018)

--August 25, 2017 HISTORIC PROPERTY TREATMENT PLAN for the Bent Mountain Rural Historic District (080-0322) and the Coles-Terry Rural Historic District (080-5689) (accession # 20170828-5002 32364188)

--February 14, 2018 Revised Treatment Plan (accession # 20180215-5004)

Unless and until these three documents are rewritten to correct the problems identified above, MVP and FERC are in violation of the regulations of Section 106 of the National Historic Preservation Act.

### ***Failure to consider impacts to landscape and topographic features in rural historic districts***

Please refer to Preserve Roanoke's previous filings to FERC which discuss anticipated impacts resulting from pipeline construction through the Coles-Terry Rural Historic District, the Bent Mountain Rural Historic District, and the Blue Ridge Parkway Historic District. These filings are summarized in the chart, below.

The overriding concern expressed throughout these filings is that FERC and MVP have treated the rural historic districts that are crossed by MVP as nothing more than collections of buildings to be avoided, or buildings as arbitrary vantage points from which to assess the visibility of the pipeline. Because the pipeline has been routed through rural – not urban -- historic districts, impacts to the landscape and topographic features within the districts must be taken into consideration as part of the Section 106 process for the MVP.

As stated in National Register Bulletin 30, "Large-scale features, such as bodies of water, mountains, rock formations, and woodlands, have a very strong impact on the integrity of setting." The MVP runs roughshod over vast swaths of these large-scale features in the Coles-Terry Rural Historic District, the Bent Mountain Rural Historic District, The Bent Mountain Orchard Rural Historic District, and the Blue Ridge Parkway Historic District. MVP and FERC have both consistently failed to consider this fact. Section 106 cannot be considered to be served until MVP and FERC's analysis looks at the "spaces between" buildings, as requested by Virginia Department of Historic Resources in its April 21, 2015 meeting with Tetra Tech.

FERC Accession #

Summary of Section 106 issues discussed in each filing

20161221-5427	<p>Comments to Draft Environmental Impact Statement</p> <ol style="list-style-type: none"><li>I. The position of the DEIS is that the historic significance of the Blue Ridge Parkway lies principally in the manmade structures thereon, and that, since the MVP avoids manmade structures on the Blue Ridge Parkway, “it is unlikely that the MVP would have any adverse effects on the district.”</li><li>II. By confining its attention to structures within the district, rather than considering impacts to the district in its entirety, FERC is missing opportunities to consider whether the pipeline’s permanent imposition of a treeless stripe on the historic landscape would adversely affect the historic integrity of the Coles-Terry Rural Historic District.</li><li>III. The failure to consider impacts to landscapes and topographic features of both the Coles-Terry Rural Historic District and the Blue Ridge Parkway Historic District is a serious flaw in the DEIS, and must be corrected in subsequent documentation.</li><li>IV. As inheritors of the remarkable “sculpture” that is the Blue Ridge Parkway, it is incumbent on 21<sup>st</sup> century stakeholders to maintain the subtle and exquisite conformations of the Parkway as important relics of the cultural, economic, aesthetic, and conservation milieu of the middle-to-late 20th century period during which the Parkway was designed, constructed, and enjoyed by motorists.</li><li>V. The MVP will permanently impose the footprint of 21<sup>st</sup> century industrialization on the 19<sup>th</sup> century landscape of Adney Gap inside the Blue Ridge Parkway. This is an inappropriate use of the Blue Ridge Parkway and should be avoided in the interest of safekeeping this national treasure for the enjoyment and edification of many future generations of Americans.</li><li>VI. The MVP will impose a flat stripe of highly condensed soil – called a “grassy highway” by one resident of Bent Mountain, VA – across the historic farm fields of Adney Gap, resulting in an unavoidable interruption of the visitor’s experience of the Parkway’s historic/scenic attributes.</li><li>VII. The headwaters of the South Fork of the Roanoke River can be seen, in histories of Bent and Poor Mountain, to play an integral role in the history of Poor Mountain and the integrity of the Coles-Terry Rural Historic District. The MVP crosses through the area of springs and first order streams described eloquently in Grace Fortescue Terry’s 1957 essay, “Bent Mountain”, and crosses Bottom Creek, another water body enshrined in the high literary style of Terry’s narrative, four times. Construction of the MVP through the exquisitely pristine, irreplaceable headwaters of the Roanoke River would undermine the very bedrock of Roanoke County and southwestern Virginia’s cherished historic landscapes.</li><li>VIII. If allowed to proceed, pipeline construction inside the Coles-Terry Rural Historic District would decimate the aquatic features of Poor Mountain cherished among historians and among residents of Bent Mountain, Poor Mountain, Roanoke County, the Commonwealth of Virginia, and all who have visited this astonishingly beautiful region.</li></ol>
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<p>20161222-5276</p>	<p>Addendum to Comments to Draft Environmental Impact Statement</p> <ul style="list-style-type: none"> <li>I. This document forwards to FERC two Hill Studio visualizations of the view of Poor Mountain from the Poor Mountain Overlook on the Blue Ridge Parkway. One visualization shows the view “BEFORE” construction of the proposed Mountain Valley Pipeline. The other shows the view “AFTER” pipeline construction.</li> <li>II. The Coles-Terry Rural Historic District, which comprises a 2.4-mile wide expanse of land at the crest and on the east-facing slope of Poor Mountain, is visible from the Poor Mountain Overlook on the Blue Ridge Parkway. The construction of the MVP through the Coles-Terry Rural Historic District will drastically alter the appearance of Poor Mountain as viewed from the Poor Mountain Overlook, as well as from many points on U.S. 221 in Bent Mountain. The imposition of the MVP's treeless vertical “stripe” at the crest and down the eastern slope of Poor Mountain – indelibly demarcating 21<sup>st</sup> century industrialization – will permanently impair the appearance of the mountain as viewed from the Parkway. This incursion will result in adverse effects to integrity of the Blue Ridge Parkway Historic District.</li> </ul>
<p>20170713-5027</p>	<p>Comments to MVP’s May, 2017 Criteria of Effects Report</p> <ul style="list-style-type: none"> <li>I. In this filing, we (1) list all the techniques and technologies employed by Tetra Tech to attempt to portray the MVP pipeline as having no significant impact on historic resources in Virginia; (2) list all the documents and page numbers where the concerned reader who is interested in understanding Tetra Tech’s techniques and technologies must search within MVP’s massive and unsystematically organized May 10 filing; and (3) explain why each of the techniques and technologies employed by Tetra Tech fails to substantiate the conclusion that Tetra Tech and MVP have attempted to use them for – to claim that the MVP pipeline will have no significant adverse effects whatsoever on historic resources in Virginia.</li> <li>II. The assumption employed by Tetra Tech that the MVP pipeline’s potential to adversely impact rural historic districts lies exclusively in whether the pipeline would be visible from historic buildings thereon is wholly untenable. Nowhere in National Park Service Bulletin 30 is it stated or implied that a rural historic district’s significance can or should be assessed solely on the basis of what can be seen from the district’s buildings, or from arbitrarily assigned “vistas” or “key observation points”. Tetra Tech’s analysis, as described in these comments, imposes an arbitrary and capricious denial of the MVP pipeline’s impacts to the landscape and topographic features of rural historic districts in Virginia. Tetra Tech’s methodology is anathema to the preservation standards supported by both the National Park Service and the National Register of Historic Places.</li> <li>III. The methodology described in MVP’s May 10 filing stands as a deliberate and calculated affront to the guidance provided by Virginia Department of Historic Resources, and a denial of the precepts of historic preservation</li> </ul>

	<p>embodied in the National Register of Historic Places, National Park Service Bulletin 30, and Section 106 of the National Historic Preservation Act.</p> <p>IV. Tetra Tech’s analysis of the MVP pipeline’s impacts to historic resources in Roanoke County and elsewhere in Virginia is an affront to the principals of federally-mandated historic preservation practice as established in U.S. laws and regulations and must be done over in a manner that conforms to the letter and spirit of those laws and regulations.</p> <p>V. MVP’s May 10 filing fails utterly to document the dramatic alteration of visual elements of the Coles-Terry Rural Historic District as viewed from the top of the district along Honeysuckle Road. This is the point where the MVP pipeline begins its descent down the eastern slope of Poor Mountain into the Bent Mountain community. Standing on Honeysuckle Road, the observer looking down at the MVP pipeline’s flat, treeless “stripe” will have an experience similar to that of riding a roller coaster in an amusement park. This is precisely the type of industrial development that will destroy the integrity of the Coles-Terry Rural Historic District in perpetuity. The drastic interruption of tree cover along the crest of Poor Mountain, the drastic interruption of the variegated rocky topography of that beautiful point on Poor Mountain, and the visual impact of the MVP pipeline’s sheer vertical descent down the extraordinarily steep slope of Poor Mountain will all impose an immense impairment of the significance of the Coles Terry Rural Historic District and of the scenic qualities of this mountain.</p>
<p>20170908-5122</p>	<p>Comments to Final Environmental Impact Statement</p> <p>I. The MVP pipeline will radically transform the visual experience of travelers entering the Blue Ridge Parkway at Adney Gap by imposing a flat “stripe” of high condensed soil through a grassy agricultural field that current displays the picturesque terracing associated with the historically significant practice of mountainside livestock grazing. Mountainside cow paths or terraces can be seen today in old farm fields located in the uplands of Virginia and throughout the southeastern U.S. These sites where farmers have historically grazed cattle on the sides of slopes are subtly marked with intricate patterns formed by pathways that are the routes habitually used by the cows to walk across the elevated grazing areas. The cows’ habitual use of the same pathways for decades creates a subtle but unmistakable terracing on the side of the mountain or hill, offering a tangible reminder of the longstanding tradition of cattle rearing by small farmers in mountain lands in the southeastern U.S.</p> <p>II. Contrary to claims made by MVP, the MVP pipeline corridor is not likely to blend in visually with the surrounding fields of Adney Gap after construction is completed. This is because farmers do not run cattle on fields treated with herbicides. Farmers currently leasing land from the Blue Ridge Parkway at Adney Gap for cattle grazing will be unwilling to continue to graze their cattle inside the MVP pipeline corridor at Adney Gap due to the uncertainty of whether and when MVP, and subsequent holders of easements on the MVP pipeline, will use herbicides to prevent growth of trees and heavy shrubs in the pipeline corridor. Thus the entire</p>

	<p>MVP corridor will be “off limits” to cattle grazing. At Adney Gap, therefore, the MVP corridor will never blend in visually with the surrounding landscape because it will never be subjected to cattle grazing.</p> <p>III. If constructed, the proposed MVP pipeline would convert Green Hollow Drive, the longest extant gravel remnant of the historic Bent Mountain Turnpike (the predecessor of modern-day U.S. 221), to a permanent access road for pipeline construction crews and their heavy equipment. This transformation of the historic road network that served an important apple growing region on Bent Mountain within the period of historic significance for the Bent Mountain Rural Historic District would destroy the topographic, landscape, and visual characteristics that endow the network of old roads with historic significance. We request that FERC take corrective action under Section 106 to address the adverse impacts to the historic road network within the Bent Mountain Rural Historic District that would result from the conversion of Green Hollow Drive to a permanent MVP pipeline access road.</p> <p>IV. We also request FERC’s careful consideration of the MVP pipeline’s direct and adverse impacts to the historically significant apple growing region that was served by these historic gravel and dirt roads, which includes the King-Waldron Orchard, the Samuel Willett House, and the William Hale Settlement. The combined impacts to historic roads and landscape features in this portion of the Bent Mountain Rural Historic District resulting from construction of the MVP pipeline would be significant and must be given the fullest consideration under Section 106 of the National Historic Preservation Act.</p> <p>V. In light of the ongoing nature of Preserve Roanoke’s engagement with VDHR in the development of the proposed Bent Mountain Apple Orchard Rural Historic District, which would be crossed by the MVP pipeline, we assert that the Section 106 process for the MVP pipeline cannot be considered complete until an eligibility determination has been made for the proposed district, and the pipeline’s impacts to the district are assessed under Section 106. Certification of the MVP pipeline must be postponed until after this process of eligibility determination and impacts assessment has been satisfactorily completed.</p> <p>VI. Preserve Roanoke hereby requests FERC’s assurance that MVP will conduct all the archaeological investigations described in Preservation Virginia’s June 29, 2017 letter cited in 20170908-5122, and that both Preservation Virginia and VDHR will be consulted and fully engaged in these investigations. We strongly urge FERC to take every action to ensure that the significant archaeological sites on the Blackwater River in Franklin County, VA are given every feasible protection under Section 106 of the National Historic Preservation Act. Without full execution of the treatment plan recommended by Preservation Virginia – and supported by the Virginia SHPO -- for the archaeological sites on the Blackwater River in Franklin County, VA, the Section 106 process for the MVP pipeline will be incomplete. Certification of the MVP pipeline must be postponed until the completion of this important work under the Section 106 process.</p>
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	<p>VII. Preserve Roanoke strongly urges FERC to approve Preservation Virginia as a Consulting Party in the Section 106 process for the MVP pipeline. Having Preservation Virginia as a Consulting Party will ensure that the archaeological sites on the Blackwater River in Franklin County are given an appropriate level of protection under Section 106.</p> <p>VIII. Preserve Roanoke hereby concurs with and adopts the following comments submitted by Preserve Montgomery County under the Section 106 process for the MVP pipeline: 20170822-5008 and 20170821-5025.</p> <p>IX. Preserve Roanoke hereby concurs with and adopts comments listed below, submitted under the Section 106 process for the MVP pipeline by the Greater Newport Rural Historic District Committee.</p> <ul style="list-style-type: none"> <li>a) 20141117-5027</li> <li>b) 20150617-5078</li> <li>c) 20160304-5077</li> <li>d) 20160516-5379</li> <li>e) 20160830-5133</li> <li>f) 20161024-5068.</li> </ul> <p>X. Preserve Roanoke hereby concurs with and adopts certain portions of the comments listed below, submitted under the Section 106 process by the Greater Newport Rural Historic District Committee. The portions we wish to concur with and adopt include all except the Committee’s recommendations regarding alternative routes for the MVP pipeline.</p> <ul style="list-style-type: none"> <li>a) 20161221-5365</li> <li>b) 20170221-5263</li> <li>c) 20170306-5177</li> <li>d) 20170510-5023.</li> </ul>
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## CRITIQUE OF INDIVIDUAL PORTIONS OF THE TREATMENT PLAN

The following are comments on specific features of the Revised Treatment Plan (accession #20180215-5004).

### ***Electric powerline easement***

**Page 6 (PDF page 22) of the Revised Treatment Plan states:**

“The Coles-Terry Rural Historic District was determined NRHP-eligible with an existing power transmission corridor bisecting the district near its midpoint, running perpendicular to Poor Mountain Road. Mountain Valley reasonably concluded that this intrusion did not detract from the historic integrity of the district’s landscape, because the boundaries of the district were drawn as to generally include all the farmland and woodland along the eastern slope of Poor Mountain. The existing power transmission corridor did not detract from the overall integrity of the district to an extent that it was not included in the district boundary. Similarly, Mountain Valley recommended that changes in the landscape as a result of the Project’s permanent easement would not occur to an extent that would diminish the district’s integrity. Despite the changes, there will still be a clear distinction between farmland and woodland and differing land uses simply because the district is so heavily wooded. Cropland and pasture will be restored to cropland and pasture post construction. Mountain Valley

further recommended that the Coles-Terry Rural Historic District, like the Bent Mountain Rural Historic District, would continue to convey its rural and agricultural character and would continue to reflect its varying land uses through intact historic landscape features; the Project would not affect its continuity of use.”

The existing powerline easement through the Coles-Terry Rural Historic District has never been maintained in a tree-free condition, as is required for the MVP pipeline. As with all electric powerline easements throughout the U.S., trees, shrubs, and herbaceous plants are allowed to grow in the easement inside the Coles-Terry Rural Historic District. This will not be the case with the MVP pipeline easement, which must be kept free of trees for the commercial life of the pipeline. The periodic suppression of tree growth via mowing or herbicides will maintain the pipeline corridor as a straight, highly-differentiated stripe across the landscape for the duration of the commercial life of the pipeline. Only when the pipeline is abandoned for commercial use will the MVP pipeline corridor once again be allowed to support trees and shrubs comparable to what is found in an electric powerline easement.

### ***Visualizations that visualize***

**Page 6 (PDF page 22) of the Revised Treatment Plan states:**

“Mountain Valley’s photograph simulations depicting potential views from both the Bent Mountain Rural Historic District and the Coles-Terry Rural Historic District towards the Project demonstrate that the potential changes in the districts’ viewsheds and settings are “Inferior.” In other words, the visual impact is visually inferior within the context of the existing setting and surrounding landscape. Furthermore, the Project route will avoid any direct impacts on the districts’ contributing built environment (Attachment 1).”

MVP’s photo simulation of the views of the MVP pipeline from the Blue Ridge Parkway are of inexplicably inferior quality. Preserve Roanoke has, since December, 2016, repeatedly shared with MVP and FERC the very high quality photo simulation prepared for Preserve Roanoke by Hill Studio in Roanoke, VA. We offer it again, below. It shows that the view from the Poor Mountain Overlook as experienced by visitors to the Blue Ridge Parkway will be seriously compromised as a result of construction of the MVP pipeline.



*Hill Studio visualization: view from Poor Mountain Overlook on Blue Ridge Parkway, BEFORE construction of the MVP pipeline*



*Hill Studio visualization: view from Poor Mountain Overlook on Blue Ridge Parkway, AFTER construction of the MVP pipeline*

***“Undulating edge” of pipeline corridor = fantasy***

**Page 19 (PDF page 35 ) of the Revised Treatment Plan states:**

“Within the route segments depicted in Figures 4.3.1-1 through 4.3.1-3, Mountain Valley will revegetate the right-of-way to ensure that vegetative openings appear more natural and conform to the natural form, line, color, and texture of the existing landscape.”

Figure 4.3.1-4 (page 24, PDF page 40 in the Revised Treatment Plan) offers a drawing of a “conceptual plan” for establishing a “non-uniform, undulating edge” of the pipeline corridor. The drawing illustrates a plan in which all but the 10 foot strip in the center of the pipeline corridor would be seeded with pollinator plants, shrubs, small trees, and medium trees. A copy of Figure 4.3.1-4 appears in **Attachment 3**.

This plan is absurdly misleading because the entire pipeline corridor must be kept free of trees. That means that the entire corridor, not just the 10-foot strip in the center, will need to be mowed or treated with herbicides to suppress tree cover. The pollinator plants, shrubs, small trees, and medium trees, as well as the grass envisioned as ground cover in the “undulating edge” pipeline corridor must all be regularly mowed or treated with herbicide to prevent large trees such as oak, maple, beech, and poplar from growing up in their midst and damaging the pipeline with their roots.

### ***Financial underwriting of eligibility determination documents***

**Page 23 (PDF page 39) of the Revised Treatment Plan** discusses MVP’s offer to pay for preparation of a Preliminary Information Form (PIF) for the Bent Mountain Rural Historic District and National Register nominations for the Bent Mountain Orchard and the Coles-Terry Rural Historic Districts.

The PIF and National Register nominations offered by MVP will be conducted for rural historic districts that will soon bear the MVP pipeline’s indelible imprint of 21<sup>st</sup> century industrialization, a straight, treeless line drawn graffiti-like across their historically significant and stunningly beautiful landscapes. If the PIF and National Register nominations are performed prior to pipeline construction, the presence of the MVP pipeline will not be taken into consideration in terms of its impact to historic integrity of the landscapes inside the districts, but will undoubtedly be considered in subsequent project reviews. If the PIF and National Register nominations are performed during or after pipeline construction, there is a probability that VDHR and the Keeper of the National Register will be sufficiently impressed by the visual impacts of the MVP pipeline as to render the decision to deny eligibility determination for the Bent Mountain, Bent Mountain Orchard, and Coles-Terry Rural Historic Districts.

The situation of the Bent Mountain Orchard Rural Historic District is particularly dire, since MVP proposes to use Green Hollow Drive, a historic orchard road and contributing resource inside the district, as a pipeline access road. Such use will transform the historic contours and appearance of the road and the landscapes it is routed through. The transformation of Green Hollow Drive into an industrial venue will, combined with the industrialization associated with pipeline construction, drastically impair the historic integrity of the entire Bent Mountain Orchard Rural Historic District.

Finally, if National Register eligibility was not sufficient to force FERC and MVP to give adequate consideration to the landscape and topographic features of Virginia’s rural historic districts through the processes of Section 106 of the National Historic Preservation Act for the MVP pipeline, it is unlikely that added layers of eligibility determination as offered in the Revised Treatment Plan will magically protect these places from future proposals to industrialize their landscapes.

Sincerely,



Ann M. Rogers  
Member, Preserve Roanoke  
Section 106 Coordinator, Blue Ridge Environmental Defense League  
Member, Roanoke County Pipeline Advisory Committee

Attachments:

1. January 30, 2018 letter to FERC from Preserve Roanoke requesting effects assessment for Bent Mountain Orchard Rural Historic District
2. Excerpts of marketing brochure for Blue Ridge Mountain Spring Water Co.
3. Chart, Revegetative Concept (excerpted from Revised Treatment Plan)

cc:

Brian Clauto, Mountain Valley Pipeline, LLC

Roger Kirchen, Virginia Department of Historic Resources

John Eddins, Advisory Council on Historic Preservation

Betsy Merritt, National Trust for Historic Preservation

Mary Krueger, National Park Service

Andrea Ferster, Attorney-at-Law

Sonja Ingram, Preservation Virginia

Richard Caywood, Roanoke County

Alison Blanton, Roanoke Valley Preservation Foundation

Grace Terry

David Brady, Section 106 Coordinator, Greater Newport Rural Historic District Committee

Anita Puckett, Section 106 Coordinator, Preserve Montgomery County



# COMMONWEALTH of VIRGINIA

Matt Strickler  
Secretary of Natural Resources

**Department of Historic Resources**  
2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan  
Director

Tel: (804) 367-2323  
Fax: (804) 367-2391  
[www.dhr.virginia.gov](http://www.dhr.virginia.gov)

March 8, 2018

Mr. Paul Friedman  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

Re: *Mountain Valley Pipeline Project, Revised Historic Property Treatment Plan, Bent Mountain Rural Historic District (080-0322), Bent Mountain Apple Orchard Rural Historic District (080-5731), and Coles-Terry Rural Historic District (080-5689)*  
FERC Docket No. CP16-10-000; DHR File No. 2014-1194

Dear Mr. Friedman:

The Department of Historic Resources (DHR) has received the document referenced above (revised February 2018) prepared by Tetra Tech for Mountain Valley Pipeline, LLC (MVP) and the Federal Energy Regulatory Commission (FERC) in accordance with Stipulation III.B of the Programmatic Agreement (PA) executed for this project. This Treatment Plan presents those actions to be taken by MVP to minimize and mitigate the adverse effects of the project on the Bent Mountain Rural Historic District (DHR ID #080-0322), Bent Mountain Apple Orchard Rural Historic District (DHR ID #080-5731), and Coles-Terry Rural Historic District (DHR ID #080-5689) in Roanoke County, Virginia. Specifically, the Treatment Plan proposes 1.8 miles of enhanced right-of-way revegetation, National Register of Historic Places nominations for the Bent Mountain Apple Orchard Rural Historic District and Coles-Terry Rural Historic District, a Preliminary Information Form for the Bent Mountain Rural Historic District, and \$500,000 for the maintenance and repair of the Bent Mountain Elementary School.

It is our opinion that the revised Treatment Plan is reasonable in scale, proportionate to the effect, and takes into consideration previous comments from DHR, the Advisory Council on Historic Preservation, and other consulting parties. We ask that MVP provide to DHR a letter of intent from Roanoke County that reflects their willingness to accept the mitigation funds and requisite terms and conditions for improvements to the school. Further, the *Clarification Regarding Proposed Access Road in Vicinity of the Henry-Waldron Cemetery (DHR ID #080-5690)*, dated January 17, 2018, shows that the cemetery will be avoided and protected during the construction, use, and restoration of access road MVP-RO-281; however, we recommend that all efforts be taken to increase the 11-foot buffer between the cemetery and access road by shifting the limits of disturbance completely to the north side of the existing dirt path. Extensive comments on the Treatment Plan have been provided to MVP and the FERC from consulting parties and other

Western Region Office  
962 Kime Lane  
Salem, VA 24153  
Tel: (540) 387-5443  
Fax: (540) 387-5446

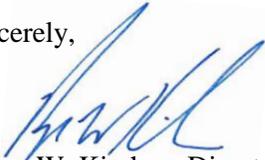
Northern Region Office  
5357 Main Street  
PO Box 519  
Stephens City, VA 22655  
Tel: (540) 868-7029  
Fax: (540) 868-7033

Eastern Region Office  
2801 Kensington Avenue  
Richmond, VA 23221  
Tel: (804) 367-2323  
Fax: (804) 367-2391

stakeholders. We remind the FERC of its responsibility under the PA to meaningfully consider all comments from consulting parties prior to approving any final Treatment Plan.

It should be noted that the Treatment Plan, including the Table of Contents and Figures, regularly references Section 4.3 of the plan, but this section does not exist. The plan should be amended to correct this error. Should you have any questions concerning these comments, please do not hesitate to contact me at [roger.kirchen@dhr.virginia.gov](mailto:roger.kirchen@dhr.virginia.gov).

Sincerely,



Roger W. Kirchen, Director  
Review and Compliance Division

- c. Mr. John Eddins, ACHP  
Mr. John Centofanti, MVP

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission (FERC)  
888 First Street, N.E.  
Washington, DC 20426

March 8, 2018

RE: FERC Docket CP 16-10 – Clarification of “FERC Approved Route’  
Condition #18 – Appendix C FERC “Certificate” - Landowner Specific Crossing Plans  
Roanoke County, Virginia  
Tract Nos. VA-RO-040, VA-RO-042, VA-RO-043, AR-RO 281

Dear Members of the Commission,

MVP has submitted a revised pipeline route (#20180215-5004) through our property in response to FERC Certificate requirement to file an avoidance plan for the Henry-Waldron Cemetery (VDHR #080-5690), **and** to satisfy ‘Condition 18’ (Landowner Specific Crossing Plan) of the FERC Certificate. The submittal included Figure 2.2 “**Proposed Route within the Coles-Terry Rural Historic District**” (December 2017).

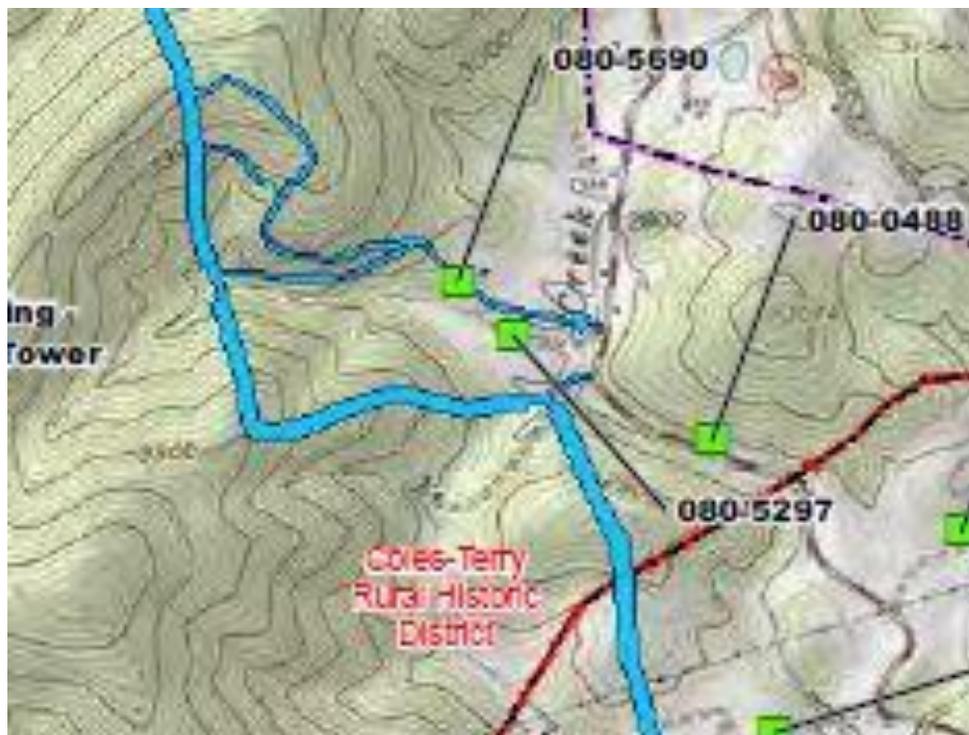


Figure 2.2 “Proposed Route within the Coles-Terry Rural Historic District” (December 2017). (#20180215-5004)  
This route avoids the cemetery.

Yesterday, March 7, 2018, the federal court in Roanoke granted MVP immediate possession of the route **which transects the cemetery!** (Excerpt below)

RE: FERC Docket CP 16-10  
Henry-Waldron Cemetery - Site # 080-5690  
March 8, 2018

[Civil Action No. 7:17-cv-00492 IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF VIRGINIA ROANOKE DIVISION]

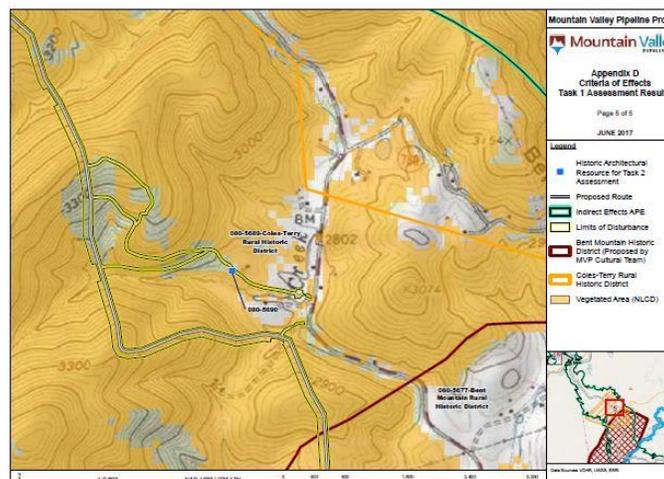
#### 4. Scott Property

*According to the defendants, parcels owned by James and Karen Scott have been subject to an agreed-upon change in route, and MVP is supposed to notify FERC regarding that route change. For these properties, therefore, the landowners object to the proposed orders on the ground that they include the prior route, not the route change. MVP has responded that it seeks possession of the only route it has legal authority to condemn, the approved route. When FERC approves the route change, MVP will submit a revised order that reflects the approved route, as modified. The court believes that course of action is proper because it can only order condemnation of the properties as allowed by FERC. The Scotts' objection is overruled.*

Today, MVP has 'possession' of the cemetery. MVP has just a few weeks to cut all the trees along the route. They can now cut trees on the wrong route.

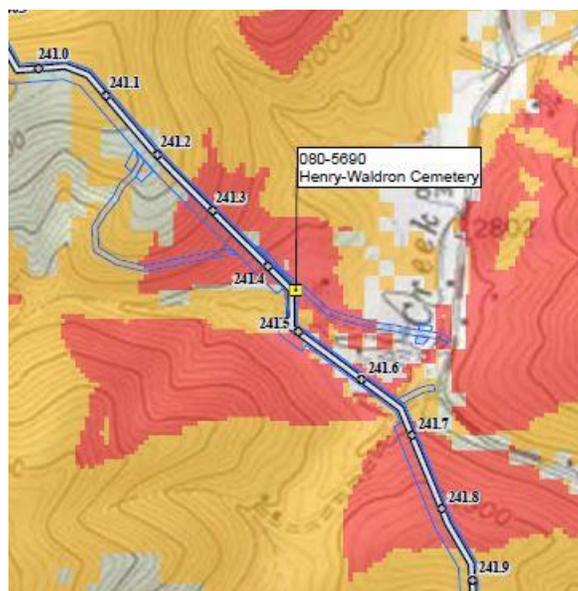
We are very concerned that the court concurred with MVP that the route through the cemetery is the 'FERC Approved Route', and thus the only route that MVP "has legal authority to condemn, the approved route". We disagree that the route through the cemetery is in fact a 'FERC Approved Route', because the 'approval' contains conditions that have not been satisfied.

Note that MVP has submitted the 'revised route' over 9 months ago. In June, 2017, MVP submitted "MOUNTAIN VALLEY PIPELINE PROJECT PHASE I SURVEY SUPPLEMENTAL INFORMATION AND CRITERIA OF EFFECTS REPORT: ADDENDUM 2; Montgomery and Roanoke Counties, Virginia - DOCKET NO. CP16-10; DHR FILE #2014 1194



This is the route MVP has been submitting to FERC as part of the avoidance of the cemetery since June 2017 – however, MVP sought and received possession of the old route that transects the cemetery (shown below).

RE: FERC Docket CP 16-10  
 Henry-Waldron Cemetery - Site # 080-5690  
 March 8, 2018



**The 'FERC Approved Route' condemned in court goes through cemetery**

**MVP has now been granted 'immediate possession' of the route through the cemetery** – even though MVP has submitted to FERC, as far back as June 2017, a revised route to avoid the cemetery – and has populated distance data in the *Criteria of Effects Report* using distances for the revised route.

FERC should consider notifying the court of the situation so this unnecessary drama with the 'early take' of the cemetery route is resolved.

Significantly, although there are several remaining issues, we are being told that MVP needs us to 'sign an easement' prior to submitting the revised route to FERC.

We believe that MVP's position on this issue denies the landowner due process. MVP's position places extreme pressure on the landowner to accept an unreasonable 'offer' of compensation, OR ELSE, the pipeline route will go through both our son's house site and the historic cemetery, voiding the FERC requirements to avoid the cemetery and submit a landowner crossing plan to avoid our son's house under development.

**MVP stated in court, that it intends to build through the cemetery regardless of FERC conditions.** (From the court Order granting injunction)

*...Scott's property contains a historic cemetery, and he avers that MVP offered to purchase a different route from him (that would avoid the cemetery), but that the complaint references the original route of the FERC application, which would go through the cemetery.*

.....  
*As to the Scott property, MVP acknowledges that it seeks to condemn the original route, instead of the route that would avoid the cemetery. As MVP correctly notes, the only route that it has*

RE: FERC Docket CP 16-10  
 Henry-Waldron Cemetery - Site # 080-5690  
 March 8, 2018

*authority to condemn is the FERC-approved route. Put differently, it cannot unilaterally alter the route across properties that it has to obtain by condemnation. If it reaches an agreement with a landowner, however, the owner and MVP can jointly seek approval from FERC for a route variation, and those requests are usually granted. So MVP is going forward with the original route on the Scott property—the only FERC-approved route—because that is the only route it is authorized to obtain by condemnation and it has been unable to obtain it by agreement. Nonetheless, MVP explains that it continues to survey the property and that it is willing to consider an alternative route if it can reach an agreement with the Scotts. **In the absence of an agreement, however, it will condemn the original route approved by FERC, and that is where it will build.** (Emphasis added).*

The court has allowed the taking of the wrong route, the one through the cemetery and house site. As the judge stated, MVP has declared that they intend to build through the cemetery.

We request that FERC immediately clarify to MVP, and the court, that the landowner crossing plans can and should be filed immediately with FERC regardless of easement status. The court agreed MVP did not have to act in good faith in the effort to obtain an easement, and MVP was quick to condemn the wrong route through the cemetery. We should not be 'forced' to sign an easement prior to FERC accepting the route 'change' to save the cemetery and son's house site.

We request FERC immediately clarify to MVP that they are not to proceed with any activity on the 'cemetery route'. FERC must not issue any orders granting notice to proceed for the route through the cemetery. This is an urgent situation in that MVP desires to clear trees on the 'wrong route' within the next three weeks.

FERC must refuse to issue any orders allowing work on this property until this is resolved. FERC should immediately acknowledge that the route MVP submitted as the cemetery 'avoidance plan route' is the new "FERC Approved Route", thus avoiding a loss of cemetery by the court Order, bypassing FERC duty under Section 106 with regard to this historic cemetery.

James & Karen Scott

FEDERAL ENERGY REGULATORY COMMISSION  
WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:  
OEP/DG2E/G3  
Mountain Valley Pipeline LLC  
CP16-10-000

March 13, 2018

Matthew Eggerding, Counsel  
Mountain Valley Pipeline LLC  
625 Liberty Ave., Suite 1700  
Pittsburgh, PA 15222

**Re: Implementation of Treatment Plans in Virginia**

Dear Mr. Eggerding:

I grant your March 9, 2018 request, for Mountain Valley Pipeline LLC (Mountain Valley) to implement the site-specific measures outlined in the Treatment Plans for the Big Stony Creek Historic District (Historic Site No. 35-5127) and Greater Newport Rural Historic District (Historic Site No. 35-412) in Giles County, Virginia; the North Fork Valley Rural Historic District (Historic Site No. 60-574) in Montgomery County, Virginia; the Bent Mountain Rural Historic District (Historic Site No. 80-5677), Coles Terry Historic District (Historic Site No. 80-5689), and Bent Mountain Apple Orchard Rural Historic District (Historic Site No. 80-5731) in Roanoke County, Virginia; and the north side of archaeological site 44FR370 in Franklin County, Virginia, with certain criteria cited below. This approval is in accordance with Stipulation III.B.6 of the Programmatic Agreement (PA) for the Mountain Valley Project executed in December 2017,

Mountain Valley filed revised Treatment Plans for the Big Stony Creek Historic District on February 5, 2018; for the Greater Newport Rural Historic District on February 13, 2018; for the North Fork Valley Rural Historic District on February 2, 2018; for the Bent Mountain Rural Historic District, Bent Mountain Apple Orchard Rural Historic District, and the Coles Terry Historic District on February 14, 2018; and the north side of archaeological site 44FR370 on January 16, 2018. In accordance with Stipulation III.B.1 of the PA, the Virginia Department of Historic Resources, representing the State Historic Preservation Office (SHPO), accepted certain of those Treatment Plans in letters dated March 8 and 9, 2018. In the case of the North Fork Valley Rural Historic District and archaeological site 44FR370, the SHPO did not file timely comments within the review period, so we assume concurrence with those Treatment Plans, pursuant to Stipulations III.B.1 and 2 and IV.A of the PA. In its revised Treatment Plans, Mountain Valley documented consultations with consulting parties and other stakeholders regarding disagreements with measures in draft plans. After consideration of comments from other

- 2 -

consulting parties and stakeholders on both draft and revised plans, FERC staff approves the Revised Treatment Plans in accordance with Stipulation III.B.5 of the PA.

In the case of all sites to be treated, Mountain Valley must have landowner permission or executed easement agreements prior to implementation of treatment measures. Mountain Valley cannot construct within the boundaries of any of the adversely affected historic properties until after it has documented that field work has been completed, through the filing of Management Summaries in accordance with Stipulation IV.H of the PA, and receives a notice to proceed with construction from FERC.

The Management Summaries should address the comments of the SHPO and other consulting parties on the Revised Treatment Plans. For example, for the Greater Newport Rural Historic District, Mountain Valley should consider having the Newport Community Center and Park Preservation Fund be provided to and administered by Preserve Newport Historic Properties, as suggested by Giles County. For the Bent Mountain Rural Historic District, Mountain Valley should document that Roanoke County is willing to accept and manage the mitigation funds, and file a revised avoidance plan that increases the buffer from the Henry-Waldron Cemetery (Historic Site No. 80-5690). This would also address the March 8, 2018 comments of James and Karen Scott. In response to the March 5, 2018 comments of Montgomery County regarding the North Fork Valley Rural Historic District, Mountain Valley should document that it discussed the proposed exhibit with the Montgomery Museum, and indicate if the Museum is willing or capable to administer the mitigation funds. As an alternative, Mountain Valley should consider another non-profit administrator for the funds, and the use of mitigation money to restore and preserve specific historic resources within the District, such as Bennetts Mill.

If you have any questions, please contact me at telephone number 202-502-8059 or email to [paul.friedman@ferc.gov](mailto:paul.friedman@ferc.gov). Thank you for your cooperation.

Sincerely,



Paul Friedman  
Environmental Project Manager  
Office of Energy Projects

cc: Public File, Docket No. CP16-10-000

**WORK PLAN AND SCHEDULE  
FOR  
Bent Mountain (080-5677), Bent Mountain Apple Orchard (080-5731),  
and Coles-Terry (080-5689) Rural Historic Districts**

**ATTACHMENT 2**

**Schedule**

**PIF Schedule**

		TASK 1	TASK 2	TASK 3
		BACKGROUND RESEARCH AND DEVELOPMENT OF HISTORIC CONTEXTS	FIELDWORK	PIF
2018	JAN.			
	FEB.			
	MAR.			
	APRIL			
	MAY			
	JUNE			
	JULY			
	AUG.			
	SEPT.			
	OCT.			
	NOV.			
	DEC.			
2019	JAN.			
	FEB.			
	MAR.			
	APRIL			
	MAY			
	JUNE			
	JULY			
	AUG.			
	SEPT.			
	OCT.			
	NOV.			
	DEC.			

**Key Dates:**

- 06/30/2018 Field documentation ends
- 07/01/2018 Draft PIF to MVP
- 07/31/2018 Draft PIF to DHR
- 08/30/2018 DHR comments on Draft due
- 09/29/2018 Revised PIF to MVP
- 10/29/2018 Revised PIF to DHR

**NRHP Nominations Schedule**

		TASK 1	TASK 2	TASK 3
		BACKGROUND RESEARCH AND DEVELOPMENT OF HISTORIC CONTEXTS	FIELDWORK	NRHP NOMINATIONS
2018	JAN.			
	FEB.			
	MAR.			
	APRIL			
	MAY			
	JUNE			
	JULY			
	AUG.			
	SEPT.			
	OCT.			
	NOV.			
	DEC.			
2019	JAN.			
	FEB.			
	MAR.			
	APRIL			
	MAY			
	JUNE			
	JULY			
	AUG.			
	SEPT.			
	OCT.			
	NOV.			
	DEC.			

**Key Dates:**

- 10/31/2018 Field documentation ends
- 09/29/2018 Draft NRHP Boundary and PoS to MVP
- 10/29/2018 Draft NRHP Boundary and PoS to DHR
- 11/28/2018 DHR comments on draft due
- 12/28/2018 Final NRHP Boundary to MVP
- 01/27/2019 Final NRHP Boundary to DHR
- 04/03/2019 Draft NRHP Nominations to MVP
- 05/03/2019 Draft NRHP Nominations to DHR
- 06/02/2019 DHR comments on Draft due
- 07/02/2019 Second Draft NRHP Nomination to MVP
- 08/01/2019 Second Draft NRHP Nomination to DHR
- 08/31/2019 DHR comments on Second Draft due
- 09/30/2019 Final Nomination to MVP
- 10/30/2019 Final NRHP Nomination to DHR

**WORK PLAN AND SCHEDULE  
FOR  
Bent Mountain (080-5677), Bent Mountain Apple Orchard (080-5731),  
and Coles-Terry (080-5689) Rural Historic Districts**

**ATTACHMENT 3**

**Terms and Conditions**

**BENT MOUNTAIN CENTER  
PRESERVATION FUND  
TERMS AND CONDITIONS**

**RECITALS**

A. Mountain Valley Pipeline, LLC (Mountain Valley) obtained a Certificate of Public Convenience and Necessity from the Federal Energy Regulatory Commission (FERC) pursuant to Section 7(c) of the Natural Gas Act authorizing it to construct and operate the proposed Mountain Valley Pipeline Project (Project) located in 17 counties in West Virginia and Virginia, including Roanoke County.

B. FERC is the lead federal agency for compliance with the National Environmental Policy Act and Section 106 of the National Historic Preservation Act (NHPA) for this undertaking.

C. Through the Section 106 process, it has been determined that the Project will have an Adverse Effect on the Bent Mountain Rural Historic District (District).

D. A Revised Historic Property Treatment Plan (Treatment Plan) has been developed to document and implement mitigation measures to avoid, minimize, and compensate for effects on the District.

E. As a compensatory mitigation measure, the Treatment Plan provides for the establishment of a Bent Mountain Center Preservation Fund (Fund) in the amount of \$500,000, to be funded by Mountain Valley and dedicated to the restoration and preservation of the Bent Mountain Center (formerly Bent Mountain Elementary School) (contributing resource DHR#080-0322) (Historic Structure), an important contributing resource within the District.

F. These Bent Mountain Center Preservation Fund Terms and Conditions (Terms and Conditions) have been prepared for the purpose of ensuring that the Fund is used solely for the purpose of providing mitigation for the identified adverse effect to the District in a manner that is consistent with the requirements and objectives of the NHPA.

G. The Roanoke County Board of Supervisors (County), a consulting party, has been selected as the appropriate party to administer the Fund in continuing consultation with the Virginia Department of Historic Resources (DHR).

**NOW, THEREFORE,** in consideration of these premises and other good and valuable consideration, the receipt and sufficiency of which the County acknowledges, County agrees as follows:

1. Consent to Be Bound to these Terms and Conditions. The County covenants, promises, and agrees that it shall hereby be bound by these Terms and Conditions, including without limitation any and all conditions or limitations pertaining to receipt and use of funds.

2. Restoration and Preservation of Historic Structure. Except as stated in Paragraph 4, the Fund shall be used solely for purposes related to the restoration and preservation of the Historic Structure in a manner that is not materially inconsistent with the Secretary of Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* and will not cause any adverse effects to the resource.

3. Continuing Consultation with DHR. The County shall administer the Fund in consultation with DHR. Consultation shall mean, at a minimum, that in advance of commencing any study, restoration, construction, or other work using moneys from the Fund, the County shall inform DHR in writing of its plans and give due consideration to the views and opinions of DHR.

4. Substitution for Historic Structure. The County may, in its discretion, use all or a portion of the moneys from the Fund for the restoration or preservation of one or more different historic structures, provided that (i) any such substitute historic structure is a contributing resource to the District and (ii) DHR has been consulted on the substitution.

**IN WITNESS WHEREOF,** County has caused these Terms and Conditions to be signed its behalf by the undersigned.

**ROANOKE COUNTY BOARD OF SUPERVISORS**

\_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

**WORK PLAN AND SCHEDULE  
FOR  
Bent Mountain (080-5677), Bent Mountain Apple Orchard (080-5731),  
and Coles-Terry (080-5689) Rural Historic Districts**

**ATTACHMENT 4**

**Resumes**



**JENNA E. DUNHAM, MS**  
**Project Manager**  
**Portsmouth, New Hampshire Office**

**Jenna Dunham, MS**, joined SEARCH in 2014 and is responsible for conducting architectural history surveys and reports, including documentation of structures, eligibility assessments, historic research, and historic map analysis. Ms. Dunham has ten years of professional experience, including completion of National Register nominations, architectural documentation reports, conditions assessments, and property research. She has worked across the Northeast, Southeast, California, Colorado, Michigan, and Texas. She previously worked with FEMA, where she completed Section 106 review for historic structures damaged in Hurricane Irene. Ms. Dunham has advanced training in Sections 106 and 110 of the National Historic Preservation Act, Section 4(f), and NEPA. She received her master's degree in Historic Preservation from the University of Pennsylvania in 2007, her bachelor's degree in Cultural and Historic Preservation in 2004, and completed archaeological field school in Newport, Rhode Island in 2001. Her research specializations include vernacular architecture, historic cemeteries, and food preservation techniques of colonial America.

**EDUCATION**

MS 2007 Historic Preservation. University of Pennsylvania.  
BA 2004 Cultural and Historic Preservation. Salve Regina University.

**SPECIALIZATIONS**

Cultural Resource Management  
Archival Research  
National Register Nominations  
Historic Structure Inventory and Survey  
Historic Architecture of the Northeastern United States  
Preservation of Historic Cemeteries

**PROFESSIONAL EXPERIENCE**

2014–present Architectural Historian, SEARCH  
2013–2014 Strategic Media Manager, Ocean Home Magazine  
2011–2012 Historic Preservation Specialist, FEMA  
2009–2011 Architectural Historian, EBI Consulting  
2008–2009 Preservation Planner, Vanasse, Hangen, and Brustlin, Inc. (VHB)

**PROFESSIONAL DEVELOPMENT AND TRAINING**

**2016** “Approved Consultant” training for Community Development Block Grant Program sponsored by the Vermont Division for Historic Preservation and Vermont Community Development Program  
**2016** “Architectural Historian Consultant” training sponsored by the Vermont Division for Historic Preservation  
**2014** “Cultural Architectural Resource Management Archive (CARMA) and Survey” training sponsored by the Maine Historic Preservation Commission.  
**2009** “The Section 106 Advanced Seminar,” course sponsored by the Advisory Council on Historic Preservation.  
**2008** “The Section 106 Essentials” course sponsored by the Advisory Council on Historic Preservation.



## PROFESSIONAL REGISTRATIONS AND ASSOCIATIONS

National Trust for Historic Preservation, member  
Somersworth Historic District Commission, Vice-Chair

## SELECT PROJECT EXPERIENCE

**Project Manager.** Conduct architectural survey and evaluation for properties located within flood risk zones in Portsmouth's Historic District in New Hampshire. Participated in public meetings with the Local Advisory Committee to discuss local concerns regarding historic resources and rising tidal waters due to climate change. Provide mitigation recommendations for the City of Portsmouth and Local Advisory Committee to use as a future planning tool. Conducted for City of Portsmouth.

**Principal Investigator.** Historic Resource Survey and Report Preparation for the Northern Pass Transmission Line Corridor, Multiple Counties, New Hampshire. Conducted survey and documentation of historic properties, historic districts, and cultural landscapes along proposed and alternative transmission line routes. Made recommendations for further intensive survey and evaluation of historic buildings, bridges, cemeteries, rural historic districts, historic districts, and cultural landscapes. Also created a draft cultural landscape planning document for the New Hampshire Division of Historical Resources. Conducted for SE Group, LLC.

**Principal Investigator.** Conduct Section 106 review for Army Corps of Engineers project replacing the Pingree Bridge over the Blackwater River in Salisbury, NH. During a field survey, Ms. Dunham determined the surrounding village was potentially eligible as a rural historic district. As part of mitigation and compliance for the bridge replacement project, Ms. Dunham assisted in the update of the survey form for the Pingree Bridge (SLS0001). At the request of NHDHR, Ms. Dunham completed a Historic District Area Form (SLS-WSHD). This included the survey of both contributing and non-contributing properties in the proposed district, as well as photographing all structures within the proposed district boundaries in order to record and document the character defining features of the area. In order to determine the boundaries of the historic district, the Secretary of the National Register of Historic Places boundary guidelines was utilized. NHDHR agreed with the consultants that the area was eligible as a rural historic district in 2009.

**Principal Investigator.** Conducted site file research at NHDHR and archival research at NH Historical Society, NH State Library, Kingston Historical Society, and Kingston Library for proposed supermarket development project in Kingston NH. The proposed project was adjacent to a local historic district. Ms. Dunham completed a NHDHR Project Area Form, which concluded with the proposed expansion of the historic district boundaries. Ms. Dunham' completed and updated Historic District Area Forms and Evaluations. Archival quality photographs were taken and printed in accordance with NHDHR standards.

**Principal Investigator.** State Register of Historic Places Nomination for the Rye Public Library in Rye, New Hampshire. Conducted for the Friends of the Rye Public Library.

**Principal Investigator.** Conducted archival and file research at Massachusetts Heritage Commission (MHC), Quincy Historical Society, Quincy Historic and Preservation Planning Department, and online databases for historic and previously surveyed properties in downtown Quincy, MA. Completed or updated 75 inventory forms for individual properties and Quincy Historic District.



**Mikel Travisano, MS**  
**Architectural Historian, Principal Investigator**  
**Gainesville, Florida Office**

**Mikel Travisano, MS**, joined SEARCH in 2015 and has more than ten years of professional experience. Mr. Travisano is responsible for directing all phases of architectural history projects. His specialties include HABS photography, modernist architecture, archival research, historic preservation, and architectural conservation. His experience with architectural styles and historic districts ranges from some of the oldest buildings and historic districts in the United States to working with local government landmark agencies to address style, material, size, and height issues of new buildings in historic districts. He is experienced with implementing Sections 106 and 110 of the National Historic Preservation Act (NHPA), and Section 4(f) of the DOT Act for private and public sector clients. His qualifications exceed those set forth by the Secretary of Interior's Standards and Guidelines for Archeology and Historic Preservation (48 FR 44716-42). He is qualified for Architectural History by the Indiana Department of Natural Resources; as for Architectural Historian and Historian Field Supervisor by the Kentucky Heritage Council and for Architectural History by the Ohio State Historic Preservation Office. Mr. Travisano has authored or co-authored more than 100 technical reports, articles, and presentations.

**EDUCATION**

MS 2005 Historic Preservation. Columbia University.  
BFA 1997 Photography. Temple University.

**RESEARCH SPECIALIZATIONS**

Historic Preservation	Cultural Resource Management
Architectural Conservation	Architectural History
HABS/HAER Documentation	Archival Research
History	

**PROFESSIONAL EXPERIENCE**

2015-present Architectural Historian, SEARCH  
2013-2015 Construction Project Manager, Sciam Construction, LLC.  
2012-2013 Capital Projects Manager, Douglas Elliman Property Management  
2007-2012 Architectural Conservator, The Historic House Trust of New York City  
2005-2007 Architectural Historian, GMI/Versar  
2004 Intern, David V. Abramson Architects

**VOLUNTEER POSITIONS**

Board of Directors, Adventures in Preservation (2014 to 2015)  
Vice-President Emeritus, Columbia University Preservation Alumni (2010-2011)

**PROFESSIONAL CERTIFICATIONS**

National Preservation Institute, Recent Past: Strategies for Evaluation Workshop  
National Preservation Institute, Section 106 Workshop  
Restore, Masonry Conservation Workshop



## SELECT PROJECT EXPERIENCE

### 2017

**Principal Investigator.** *Cultural Resource Assessment Survey in Support of the Boynton Beach Boulevard and Gateway Boulevard Interchange Improvements, Palm Beach County Florida.* A historic architectural and archaeological survey in support of improvements along Interstate 95 at Boynton Beach Boulevard and Gateway Boulevard. The architectural survey identified and evaluated 79 historic resources within the APE, including 75 newly recorded historic resources and four previously recorded resources. One newly recorded resource was recommended NHRP-eligible and one previously recorded was identified as the NHRP-eligible Seaboard Airline Railway. The report presented the findings and determined the eligibility for listing the historic resources on the NRHP. Conducted for FDOT, District 4.

**Principal Investigator.** *Cultural Resource Assessment Survey of Hollywood Beach Gardens Sidewalk Improvements, Broward County Florida.* A historic architectural survey in support of proposed sidewalk improvements to the Hollywood Beach Gardens subdivision within the City of Hollywood. The architectural survey was unique in that the APE was defined to include the entire Hollywood Beach Gardens subdivision. The methodology was developed in coordination with the FDOT, District 4 and the Florida Division of Historical Resources (FDHR). The consultation determined that a survey of the individual buildings was unnecessary and that a reconnaissance-level survey and research aiding in the evaluation of a potential historic district within Hollywood Beach Gardens was sufficient. SEARCH evaluated the subdivision, which had an unusual street plan based upon historic precursors including Indianapolis and Washington, D.C. The report presented the findings and determined the eligibility for listing the historic resource on the NRHP. Conducted for FDOT, District 4.

### 2016

**Principal Investigator.** *Technical Memorandum Effects Assessment for the Starke Railroad Overpass Project, Bradford County, Florida.* In order to evaluate project related effects that the Starke Railroad Overpass could have on NRHP eligible and listed historic resources, SEARCH applied the Criteria of Adverse Effects to 21 historic properties within the APE including the NRHP-listed Call Street Historic District. The criteria for adverse effects included an analysis for any changes to the “character of the property’s use or of physical features within the property’s setting that contribute to its historic significance” through the “introduction of visual, atmospheric or audible elements that diminish the integrity of the property’s significant historic features” (36 CFR 800). The visual effects were delineated through the analysis of Light Detection and Ranging (LiDAR) data in a GIS application to determine a view shed. The results were presented in a technical memorandum, which determined that the project will not affect those character-defining features that contribute to the significance and integrity of NRHP-eligible or listed resources. Conducted for Jacobs Engineering and FDOT, District 2.

### 2015

**Principal Investigator.** *Cultural Resource Assessment Survey of the Carroll Street Project Development and Environmental Study (PD&E) from John Young Parkway to Michigan Avenue, Osceola County, Florida.* A historic architectural survey in support of the proposed widening, rehabilitation, and reconstruction of 1.5 miles of Carroll Street. The survey identified and evaluated 34 historic resources within the Carroll Street APE, including 25 newly recorded historic buildings and one newly recorded linear resource, the Old Dixie Highway. The survey also identified eight previously recorded resources including seven historic buildings and one NHRP-eligible linear resource, the South Florida Railroad. Conducted for Kimley-Horn and Osceola County.



**Tricia Peone, PhD**  
**Staff Historian**  
**Portsmouth, New Hampshire Office**

**Tricia Peone, PhD**, has over 10 years of experience conducting historical research and joined SEARCH in 2015 as a Historian in the Portsmouth, New Hampshire office. Dr. Peone is responsible for historical research in archives and libraries, the development of historic contexts, analysis of historical maps and photographs, and oral history interviews. Her specialties include early American cultural history, the history of New England, and the history of science, and she has presented her research at both national and international conferences. She has conducted research at libraries and archives in the United Kingdom and throughout the northeastern United States. Dr. Peone has experience with researching and documenting cultural resources for National and State Registers of Historic Places, HABS/HAER, and Section 106 reviews. She received her doctorate in History from the University of New Hampshire in May 2015. She exceeds the qualifications for historians set forth by the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation* (48 FR 44716-42).

**EDUCATION**

PhD	2015	History. University of New Hampshire.
MA	2012	History. University of New Hampshire.
MA	2007	History. SUNY Brockport.
BS	2005	History. SUNY Brockport.

**RESEARCH SPECIALIZATIONS**

- Cultural History
- Early American History
- New England History
- History of Science
- Archival Research

**PROFESSIONAL EXPERIENCE**

2015-present	Historian, SEARCH
2009-2015	Instructor, University of New Hampshire
2014	Volunteer, Historic New England
2007-2009	Adjunct Lecturer, Monroe Community College
2008-2009	Adjunct Lecturer, SUNY Brockport
2006-2007	Intern, Genesee Country Village and Museum

**PROFESSIONAL ASSOCIATIONS**

- American Historical Association
- History of Science Society

**SELECT PROJECT AND PROFESSIONAL EXPERIENCE**

**2017**

**Historian**, Desktop surveys of cultural resources for two proposed energy projects in Maine. Conducted historical background research and map review of the proposed routes to assess potential for cultural resources.



**Historian**, Cultural Resource Assessment Survey for the Indian River Lagoon South C-23/24 Southern Reservoir in St. Lucie County, Florida. Reviewed historic maps and aerial photographs for analysis of historical land use. Conducted for USACE Jacksonville District.

**Historian**, HABS/HAER documentation of the Browning House in Gibson County, Tennessee. Conducted for USACE Mobile District.

**Historian**, Mountain Valley Pipeline, Virginia. Conducted historical background research in Virginia libraries and archives, located and analyzed historic maps and photographs, developed historical contexts, and prepared reports. Conducted for TetraTech.

## 2016

**Historian**, Phase II Archaeological Investigation at Redstone Arsenal in Madison County, Alabama. Conducted for USACE Mobile District.

**Historian**, Conducted historical background research and analysis of historic maps and aerial photography for various Florida DOT projects.

**Principal Investigator**, Desktop Analysis of cultural resources in Ticonderoga, New York, for a solar installation project. Prepared historical context and map review of the project area.

**Historian**, Inventory of Epping, New Hampshire Farm. Conducted deed research and developed historical context for 250-year-old farm. Research included documentation of military service records of occupants from War of Independence through the Civil War.

## 2015-2016

**Historian**, Cultural Resources Survey of New Hampshire. Conducted research in local and state archives and libraries to collect information for a comprehensive survey of New Hampshire's history from settlement to the present day. Developed historical contexts for documentation of cultural resources in New Hampshire as part of the Section 106 process on behalf of the US Department of Energy for the Northern Pass Transmission Line Project.

## 2015

**Historian**, State Register of Historic Places Nomination for the Rye Public Library in Rye, New Hampshire. Conducted archival research and oral history interviews for nomination on behalf of the Friends of the Rye Public Library. Project resulted in the successful listing of the library to the State Register of Historic Places.

## 2009-2015

**Instructor**, University of New Hampshire. Designed curricula and taught history courses to undergraduates. Courses taught included: History of Early America, History of Colonial New England, and the Salem Witch Trials.