



August 25, 2017

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

**Subject: Mountain Valley Pipeline Project
Historic Property Treatment Plans for Four Historic Districts
Request for Review Under Section 106 of the National Historic Preservation Act
DHR File 2014-1194
FERC Docket CP16-10**

Dear Mr. Kirchen,

On behalf of Mountain Valley Pipeline, LLC, 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 1 CD and 1 paper copy of the following documents entitled:

1. *Mountain Valley Pipeline Project, Historic Property Treatment Plan: Bent Mountain Rural Historic District (080-0322) and Coles Terry Rural Historic District (080-5689)*
2. *Mountain Valley Pipeline Project, Historic Property Treatment Plan: Greater Newport Rural Historic District (035-0412)*
3. *Mountain Valley Pipeline Project, Historic Property Treatment Plan: Big Stony Creek Historic District (035-5127)*
4. *Mountain Valley Pipeline Project, Historic Property Treatment Plan: North Fork Valley Rural Historic District (060-0574)*

Please review these treatment plans under Section 106 of the National Historic Preservation Act, as amended. These reports will also be filed with the Federal Energy Regulatory Commission, lead federal agency overseeing the MVP Project.

You may contact me by telephone at (724) 873-3645 or by e-mail at mneylon@eqt.com if you have questions. You may also contact Hannah Dye, by telephone at (304) 708-0148 or by e-mail at hannah.dye@tetrattech.com.

Thank you for your attention.

Sincerely,

A handwritten signature in blue ink that reads "Megan E. Neylon".

Megan E. Neylon
Senior Environmental Coordinator

Mr. Roger Kirchen
August 25, 2015
Page 2

Attachment – 1 paper copy and 1 CD with four Treatment Plans

cc: Brian Clauto, EQT Corporation (without attachments)
Sean Sparks, Tetra Tech (without attachments)
Sydne Marshall, Tetra Tech (without attachments)
James Marine, Tetra Tech (without attachments)

MOUNTAIN VALLEY PIPELINE PROJECT

HISTORIC PROPERTY TREATMENT PLAN

**Bent Mountain Rural Historic District (080-0322) and Coles-Terry Rural
Historic District (080-5689)**

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

Prepared for



**555 Southpointe Boulevard
Canonsburg, Pennsylvania 15317**

Prepared by



TETRA TECH

**6 Century Drive, 3rd Floor
Parsippany, NJ 07054**

August 2017

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FIGURES

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Figure 2.2 Proposed Route within Coles-Terry Rural Historic District

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1.0 INTRODUCTION

1.1 Project Overview

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, is seeking 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 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 Department 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 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 (080-0322) and the Coles-Terry Rural Historic District (080-5689), both determined eligible for the National Register of Historic Places (NRHP). The FERC is consulting with the DHR on the treatment of historic properties that will be adversely impacted by the proposed Project. This Treatment Plan has been 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 and Coles-Terry Rural Historic Districts. This Treatment Plan also proposes mitigation measures designed to mitigate the adverse effects of the project.

Mountain Valley developed the direct and indirect Area of Potential Effect (APE) through consultation with the DHR. The indirect APE for historic architectural resources comprised, at a minimum, a 450-foot-wide corridor centered on the pipeline. In some areas, the APE was expanded up to one mile on either side of the pipeline in areas of higher elevation due to the possibility of distant views. The direct APE for the project was defined at the outset of the project as a 300-foot-wide corridor that would accommodate the actual construction right-of-way as well as workspace identified as project engineering and field surveys were completed.¹

¹ In a May 20, 2015, letter, DHR concurred that the indirect APE was appropriately defined and accurately reflected previous consultation.

Mountain Valley’s cultural resources consultants identified the Bent Mountain Rural Historic District (035-5127) in Roanoke County during the Phase I historic architecture survey conducted between May and November 2015. The district was surveyed comprehensively, with records made for resources over 50 years of age within the indirect APE for the project.² Coles-Terry Rural Historic District was identified subsequent to MVP’s Phase I reconnaissance survey by its comprising landowners and determined NRHP-eligible by DHR. This district was not re-inventoried by Mountain Valley.³

1.2 Project Effect

In accordance with Section 106 of the NHPA of 1966, as amended, Mountain Valley applied the Criteria of Adverse Effect to the Bent Mountain Rural and Coles-Terry Rural Historic Districts by synthesizing the results of visual, construction-related and operation-related effects assessments.

As noted in Sections 3.2 and 4.1 of Mountain Valley’s Criteria of Effects Report (May 2017), rural historic landscapes may also qualify as a Traditional Cultural Property (TCP), as defined in the National Park Service’s Guidelines for Evaluating and Documenting Traditional Cultural Properties, if the landscape’s “organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents” or if it serves as a location “where a community has traditionally carried out economic, artistic, or other cultural practices important in maintaining its historic identity.” A rural historic district’s eligibility for the NRHP as a TCP hinges on how the sites, structures, buildings, surrounding landscape, and landscape elements are used by members of the community. As such, Mountain Valley’s assessment of effects to the Bent Mountain Rural and Coles-Terry Rural Historic Districts’ rural historic landscapes involved an evaluation of direct and indirect (visual) effects to primary contributing resources within the historic district and also accounted for direct impacts on historic and current land uses, the results of which were presented in Section 4.1 of the Criteria of Effects Report.

This assessment resulted in a recommendation that changes in the rural historic landscape within the Bent Mountain Rural and Coles-Terry Rural Historic Districts as a result of the proposed project would not occur to an extent that would diminish the districts’ integrity.

The project would traverse the Bent Mountain Rural Historic District in a north-south direction and crossing areas that were historically (c.1970) deciduous forest, cropland, pasture, and orchards. However, Mountain Valley’s comparison of recent and historic land cover/use data indicated that orchards, historically located near the center of the district, are no longer intact. Also, logging activity at the northwest corner of the district, where the district overlaps with the Coles-Terry Rural Historic District, is evidenced by the infiltration of mixed and evergreen forest in an area that historically was exclusively deciduous forest. The district was historically bisected by a significant amount of evergreen forest that is now much more dispersed. Although parts of the

² Phase I Reconnaissance Architectural Survey for the Mountain Valley Pipeline, Roanoke County, Virginia (March 2016, DHR concurrence: May 25, 2016)

³ As directed by DHR during an April 21, 2015, meeting between DHR and Mountain Valley’s cultural resources consultant, Mountain Valley’s architectural survey team did not re-inventory the previously recorded historic districts within the pipeline APE in Virginia.

district would incur changes to its surrounding landscape due to tree-clearing, generally, the forested areas are no longer key in distinguishing between different historic land uses. Despite the proposed changes, there would still be a clear distinction between agricultural fields and woodland and differing land uses. Mountain Valley recommended that 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 the district's continuity of use.

The project would traverse the Coles-Terry Rural Historic District in a northwest-southeast direction crossing areas that were historically (c.1970) deciduous forest, cropland, and pasture. However, Mountain valley's comparison of recent and historic land cover/use data indicated logging activity at the southeast corner of the district, where the district overlaps with the Bent Mountain Rural Historic District, as evidenced by the infiltration of mixed and evergreen forest in an area that historically was exclusively deciduous forest. Although parts of the district would incur changes to its surrounding landscape due to tree-clearing, generally, the forested areas crossed by the project are no longer key in distinguishing between different historic land uses.

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 would 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.

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 would avoid any direct impacts on the districts' contributing built environment (Attachment 1).

Following careful study of the project and its relationship to the Bent Mountain Rural and Coles-Terry Rural Historic Districts, and considering a full range of potential direct and indirect effects to the built environment and surrounding landscape, Mountain Valley recommended that the proposed project would have No Adverse Effect on the districts.

DHR found, in a letter dated July 7, 2017, that:

Based on the submitted analyses, DHR agrees with the consultant that the expected visual (indirect) impacts from Mountain Valley on the Newport Rural Historic District, Greater Newport Rural Historic District, Big Stony Creek Historic District, Bent Mountain Rural Historic District, and Coles-Terry Rural Historic District do not significantly diminish those characteristics which make them eligible for listing in the NRHP.

...the Greater Newport Rural Historic District, Big Stony Creek Historic District, North Fork Valley Rural Historic District, 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.

2.0 DISTRICT SETTING AND ASSOCIATION

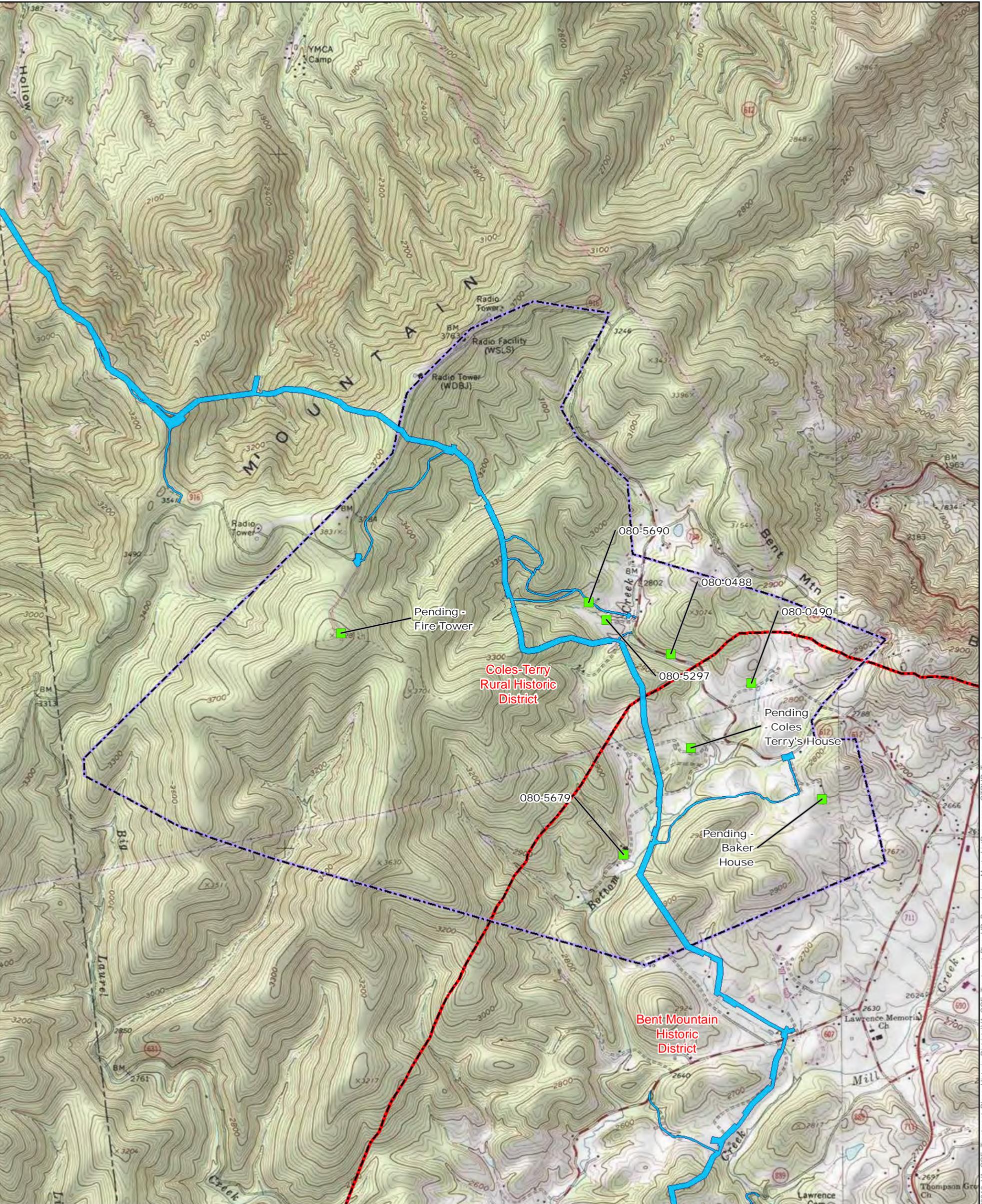
2.1 Bent Mountain Rural Historic District

Bent Mountain is a rural community established in the early nineteenth century after the initial settlement of Roanoke County. By the late nineteenth century, Bent Mountain was renowned for its apple orchards and other farm products that were transported to market in Roanoke down the Bent Mountain Turnpike, now U.S. Route 221. Today, Bent Mountain is characterized by its rural agricultural landscape that features late nineteenth- and early twentieth-century homes, barns, and other outbuildings, as well as well-preserved community buildings like the 1917 Bent Mountain School and 1947 Lawrence Memorial United Methodist Church.

During Phase I survey, MVP's cultural resources consultant recommended additional architectural survey and background research in the Bent Mountain area of Roanoke County to evaluate its eligibility for listing in the NRHP as a rural historic district under Criteria A, C, and D (Figure 2.1). It comprises 42 potentially contributing resources – buildings, structures, and farms made up of multiple buildings and structures as well as fields and other landscape features. Based on reconnaissance-level survey, Bent Mountain exhibits the physical characteristics of a rural historic district, including a concentration of buildings that are united historically by their geography, dates of construction, construction materials, and function. The proposed district covers a large area of valleys and ridges lying northwest of the Blue Ridge Parkway and overlaps with the Coles-Terry Rural Historic District and the Blue Ridge Parkway Historic District.

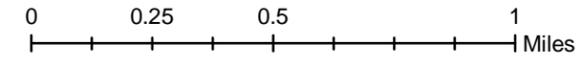
2.2 Coles-Terry Rural Historic District

This approximately 2,500-acre historic district, overlapping with the Bent Mountain Rural Historic District, lies on the eastern slope of Poor Mountain and includes the headwaters of Laurel Creek and Bottom Creek. It is mostly forested, and is owned today in its entirety by the Terry family.



Mountain Valley Pipeline Project

NAD 1983 UTM 17N



Proposed Route within the Coles-Terry Rural Historic District

Figure 2.2

August 2017

Legend

- Primary Contributing Historic Resource
- Limit of Disturbance
- Bent Mountain Historic District Boundary
- Coles-Terry Rural Historic District Boundary



Data Sources: ESRI 2017, USGS 2017.

The district was identified subsequent to MVP's Phase I reconnaissance survey by its landowners and is assumed as NRHP-eligible under Criteria A, C, and D (Figure 2.2). To date, six contributing resources dating from the late nineteenth and early twentieth centuries have been identified including farm complexes, residences, cemeteries, and other structures.

3.0 DESCRIPTION OF MOUNTAIN VALLEY AS IT AFFECTS PROPERTY SETTING AND ASSOCIATION

Mountain Valley proposes to cross the Bent Mountain Rural Historic District at approximate milepost 242 of the project, for a distance of 24,010 feet, or 4.6 miles, and the Coles-Terry Rural Historic District at approximate milepost 240 of the project, for a distance of 15,480 feet, or 2.93 miles. Construction of the belowground pipeline will include short-term, long-term, and permanent impacts on the existing vegetation cover types.⁴ Effects related to vegetation removal within the rural historic landscape was among several issues that were the focus of consultation discussions with DHR and stakeholders. When feasible, project design plans have been modified in response to issues raised in public forums, project correspondence, and docket filings. Avoidance plans related to specific properties within the district are provided as Attachment 1. These plans were developed by Mountain Valley to avoid direct impacts on contributing historic properties and were approved by the DHR in a letter dated July 7, 2017.

To the extent possible, the pipeline has been aligned parallel to existing utility rights-of-way and other linear features, and Mountain Valley will utilize existing access roads including private roads, drives, lanes, farm, or roads from previous construction to minimize clearing. Construction of the pipeline adjacent to existing rights-of-way will minimize impacts on vegetation by reducing trampling, compaction, land use change, tree clearing, and stump removal activities. The areas disturbed by construction will be restored to their original grades, condition and use or better, to the greatest extent practicable, in accordance with Project Specific Standards and Specifications approved by the Virginia Department of Environmental Quality (DEQ). Cleared vegetation will be restored using DEQ-approved native seed mixes, except in active agricultural lands that will be returned to their prior use.

Of the 24,010 feet of the project within the Bent Mountain Rural Historic District and the 15,480 feet within the Coles-Terry Rural Historic District, only a few segments, crossing roadways and residential yards, are located in areas that are accessible or visible to the public, or visible from a primary contributing historic resource.

Vegetation removal for Mountain Valley has been minimized to the greatest practicable extent. However, as DHR concluded, project-related disturbances resulting from incompatible land use practices or resulting in the physical removal of vegetation within the rural historic landscape will affect the aspects of integrity of setting, feeling, and association for the Bent Mountain and Coles-Terry Rural Historic Districts and, as a result, requires treatment.

⁴ No aboveground project facilities are proposed within the recommended NRHP boundaries for the Bent Mountain Rural and Coles-Terry Rural Historic Districts.

4.0 MITIGATION OF ADVERSE EFFECTS IDENTIFIED

4.1 Approach to the Development of Mitigation

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 adverse effect to be mitigated for the Bent Mountain and Coles-Terry Rural Historical Districts is, according to DHR, the diminution in the “very agrarian setting and feeling” of the district resulting from the “permanent fifty-foot wide imprint on [its] landscape.” To further clarify this effect and assess its magnitude, it is important to note that DHR specifically states that this effect does not arise from visual impacts on the landscape in the district. Aboveground impacts from this buried natural gas pipeline will be largely imperceptible following the restoration of the right-of-way—with the exception of the portions of the permanent right-of-way situated in currently forested areas, which will be periodically cleared of woody vegetation to protect the integrity of the pipeline.

Permanent impacts on the portions of the landscape not devoted to agriculture, and not in forest, 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 Bent Mountain Rural Historic District, this results in approximately 8,733 feet (or 36 percent) of impacts that will either be avoided or restored. 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.

Lastly, there will be no aboveground project facilities placed on the landscape within either of the districts. In light of the largely temporary impacts to the physical landscape, additional changes to project construction or restoration practices will not effectively ameliorate the adverse effect identified by DHR on the agrarian feeling and setting of the district.

Mountain Valley has identified a mitigation measure—National Register nominations for the districts or a comprehensive nomination addressing both—that will directly address the potential adverse effect identified by DHR to the “feeling” of the area for its residents and visitors by providing official recognition of its historic and cultural significance. Placement on the National Register would contribute to the future preservation of the agrarian setting and feeling of the districts. This approach is proportional to the minimal long-term physical adverse effect to the districts. It also is responsive to stakeholders’ calls for an intensive-level identification of contributing resources within the districts.

4.2 Consultation with Consulting Parties and Other Stakeholders

The DHR recommended that Mountain Valley assist the FERC with outreach to consulting parties and other stakeholders to identify appropriate mitigation measures for the adverse impacts on the Bent Mountain and Coles-Terry Rural Historic Districts. As there is no steering committee for

either of the districts, Mountain Valley contacted representatives of Preserve Roanoke and the Committee for Appalachian and Piedmont Preservation. On behalf of both of these organizations, Ann Rogers declined to meet with Mountain Valley to discuss potential mitigation strategies. Attachment 2 contains copies of telephone records and emails documenting Mountain Valley's efforts.

4.3 Proposed Mitigation Plan

Stakeholders have noted the presence of additional historic architectural and natural resources that, in their opinion, may potentially serve as contributing resources to the districts. Mountain Valley's proposed mitigation plan to address potential adverse effects is to fund the preparation of a National Register nomination for each district by a qualified historian or architectural historian meeting the *Secretary of the Interior's Professional Qualification Standards*. The historic and spatial relationships of the overlapping districts to one another as well as the potential for the districts to form one cohesive district (and the extent of that boundary) will be examined as part of the nomination process. Assuming that access to all properties within the districts is obtained, the nomination process will ensure that all contributing and non-contributing objects, sites, structures, buildings, landscape features (natural and built), etc. will be inventoried through intensive-level documentation and research. Furthermore, the process will allow each district to be designated as a NRHP-listed historic district (either individually or collectively). This designation will enable Roanoke County to preserve its character through historic preservation programs. Historic preservation programs, used as an economic development tool, will enable Roanoke County to take advantage of its history and, in combination with the county's other NRHP-listed historic districts, further develop a tourism market.

As there is no committee or point of contact specific to the districts, Mountain Valley will afford Preservation Virginia and the Committee for Appalachian and Piedmont Preservation the opportunity to, individually or collectively, choose the qualified professional (meeting the *Secretary of the Interior's Professional Qualification Standards*), administer the funds, and manage the qualified professional and deliverables. If an outside organization manages the implementation of the mitigation plan, it will adhere to all requirements of this document. If these organizations decline to serve in this capacity, Mountain Valley will assume these responsibilities.

Mountain Valley will work with the DHR to finalize the scope for the National Register nomination(s); however, Mountain Valley assumes that, based on initial research and evaluation, the qualified professional will propose an approximate National Register Boundary and Period of Significance for each historic district or one cohesive district encompassing both of the proposed districts. Subsequent to DHR review and approval of boundaries, it is assumed that the professional will prepare the National Register nomination(s) for the historic district(s) following all National Register guidelines and requirements. Minimally, the qualified professional, in consultation with DHR, will:

1. Review existing survey, historical research, publications, and architectural traditions related to the districts;

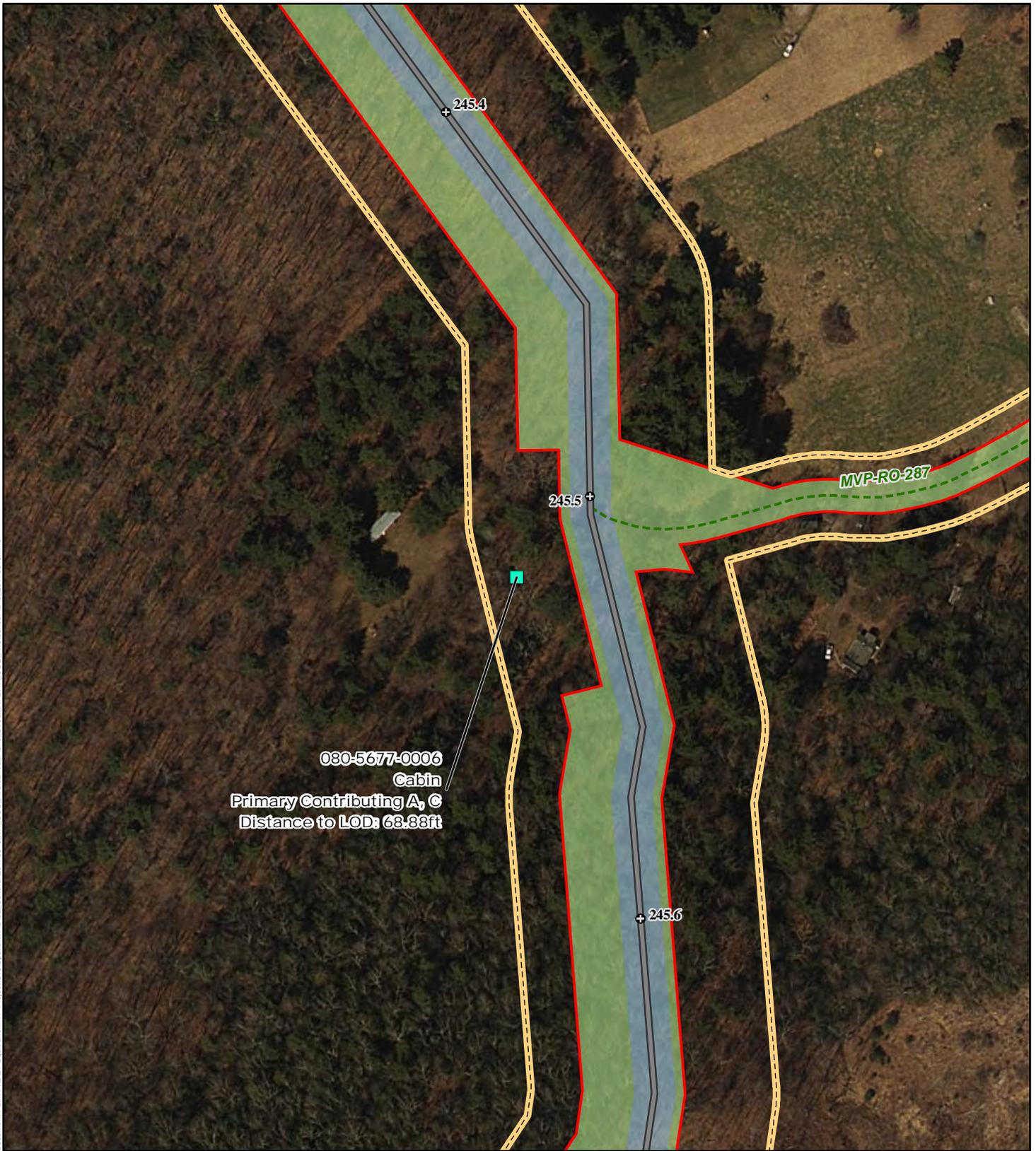
2. Propose an approximate Period of Significance and Boundary for a National Register historic district(s);
3. Produce narrative justification for recommended Period of Significance, narrative justification for recommended boundary, supporting documentation including mapping depicting the recommended boundary, photographs, and major bibliographical references used to determine the recommended boundary;
4. Prepare draft National Register Nomination(s) (although not anticipated, a second draft submission may be required at the discretion of the DHR, if warranted due to substantive comments);
5. Prepare final National Register Nomination(s) subsequent to DHR review of the draft National Register nomination(s): three (3) hard copies and one (1) digital copy (Microsoft® Office Word format) of the completed final nomination form(s) and all accompanying material (in appropriate formats)
6. Prepare 2 sets of address labels for all current property owners within the proposed National Register historic district(s) at the time of submission for use by the DHR in nomination-related correspondence.

5.0 SCHEDULE

Within two months of issuance of the FERC Certificate for the project, Mountain Valley will develop and submit a final scope of work and cost estimate for the National Register nomination(s) to the DHR for review and approval. The final scope of work and funding will be implemented accordingly (as outlined in Section 4.3 above) and all activities related to the Treatment Plan will be completed within two years of the date of the Certificate.

ATTACHMENT 1
AVOIDANCE PLANS

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080-5677-0006
 Cabin
 Primary Contributing A, C
 Distance to LOD: 68.88ft

Mountain Valley Pipeline Project NAD 1983 UTM 17N

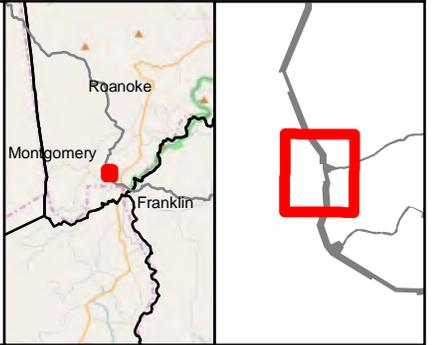
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Avoidance Plan
 Site: 080-5677-0006
 Cabin
 Roanoke County, Virginia

August 2017

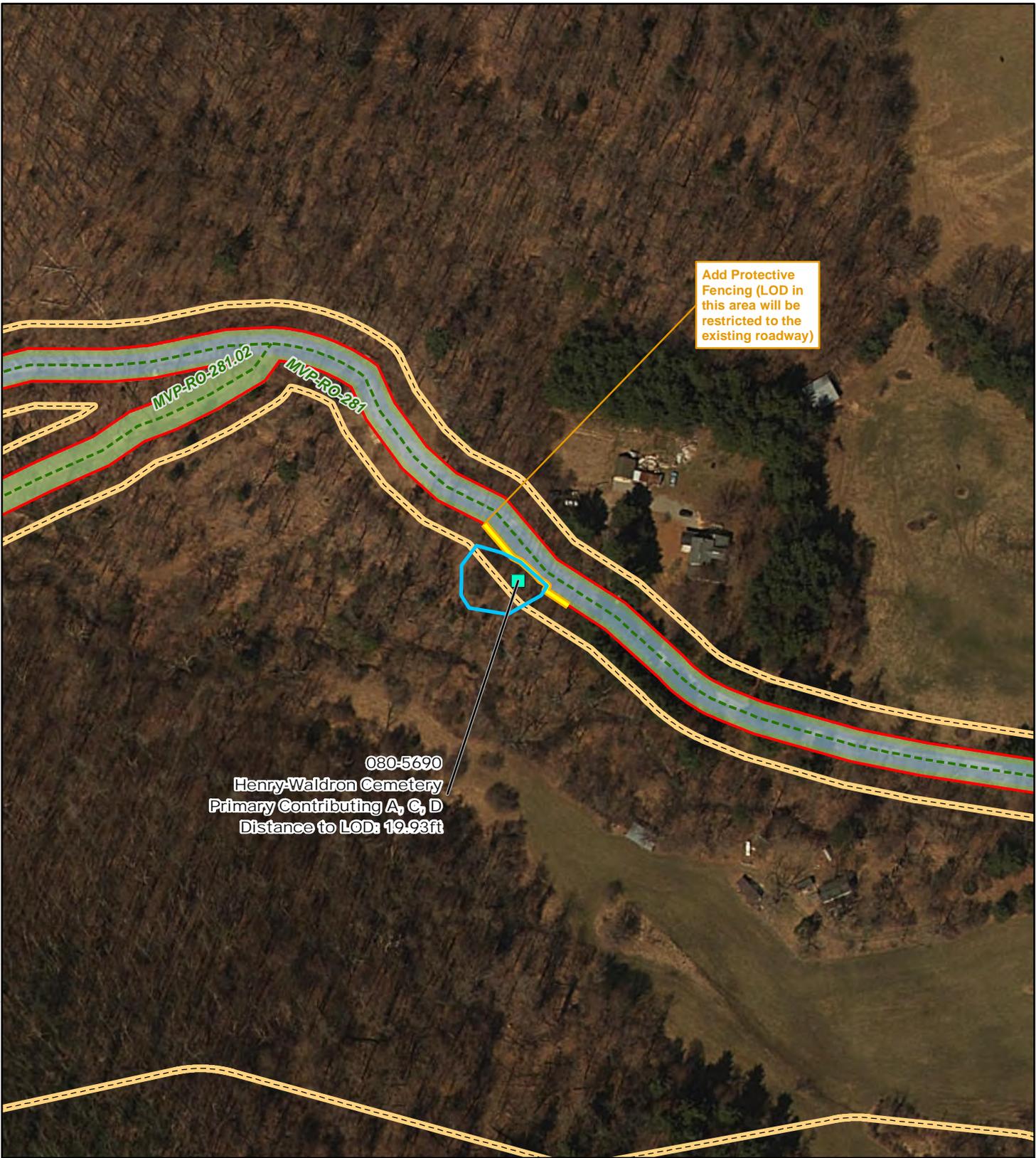
Legend

- Avoided Historical Architectural Resource
- ⊕ Milepost
- Proposed Route
- Access Road
- Direct APE
- Proposed Limits of Disturbance
- Permanent Limit of Disturbance
- Temporary Limit of Disturbance



Data Sources: USGS, ESRI, Open Street Map, VDHR.

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Mountain Valley Pipeline Project



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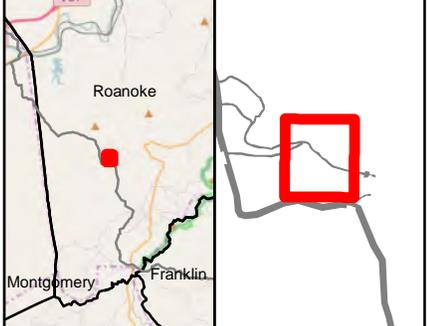
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Avoidance Plan
Site: 080-5690
Henry-Waldron Cemetery
Roanoke County, Virginia

August 2017

- Legend**
-  Avoided Historical Architectural Resource
 -  Historical Architectural Resource Boundary
 -  Protective Fencing
 -  Access Road
 -  Direct APE
 -  Proposed Limits of Disturbance
 -  Permanent Limit of Disturbance
 -  Temporary Limit of Disturbance



Data Sources: USGS, ESRI, Open Street Map, VDHR.

ATTACHMENT 2
CORRESPONDENCE

From: Ann M Rogers
To: [Neylon, Megan](#)
Cc: [Kirchen Roger \(DHR\)](#); [Elizabeth Merritt](#); [John Eddins](#); [David Brady](#); [Andrea Ferster](#); [Bert Bondurant](#); [Bonnie Law](#); [Julie Gantenbein](#); [Richard Caywood](#); [Ruth Ellen Kuhnel](#)
Subject: Re: Mountain Valley Pipeline Meeting
Date: Thursday, July 27, 2017 4:15:10 PM

Megan,

I do apologize for taking so long to respond to your invitation to meet to discuss the Mountain Valley Pipeline's impacts to the Bent Mountain and Coles-Terry Rural Historic Districts.

I agree with and wholeheartedly endorse the Virginia SHPO's finding of adverse effects on five historic districts in the proposed route of the MVP. Please refer to the SHPO's letter to you dated 7-7-17.

However, after consultation with various stakeholders who have an interest in the Mountain Valley Pipeline's impacts to historic resources including the Bent Mountain, Coles-Terry, and Blue Ridge Parkway Historic Districts, and other MVP-affected historic resources, I have concluded that until MVP is able to correct the serious flaws in its May 10 cultural resources filing, as discussed in my filing to FERC sent in behalf of Preserve Roanoke on July 12, it is pointless to discuss mitigation.

MVP has not yet offered a reasonable assessment of impacts, which is a necessary precursor to discussion of mitigation.

Thank you for contacting me.

Ann Rogers
Preserve Roanoke

From: "Neylon, Megan" <MNeylon@eqt.com>
To: "Amelvin3@verizon.net" <Amelvin3@verizon.net>
Sent: Monday, July 24, 2017 3:20 PM
Subject: Mountain Valley Pipeline Meeting

Hi Ann,

Per our conversation on Friday July 21, 2017, Mountain Valley Pipeline is trying to set a meeting with you and any other stakeholders interested in the Bent Mountain and Coles-Terry Historic Districts. Mountain Valley is considering adding the following people to the invite list. If there are any additional people that you think should attend, please let me know.

Ashley Webb – The Historical Society of Western Virginia
Alison Blanton – Roanoke Valley Preservation
Sonja Ingram – Preserve Virginia

We would like to have this meeting as soon as possible. We will be in the area on Thursday 7/27/17 as you know to

meet with Big Stony Historic District. If we could make it work, Mountain Valley could meet with you and others interested in Coles-Terry and Bent Mountain Historic Districts later in the afternoon on Thursday.

Thank you,

Megan E. Neylon
Supervisor - Permitting
Office: 724-873-3645
MNeylon@eqt.com

From: Anita Puckett
To: [Neylon, Megan](mailto:MNeylon@eqt.com)
Subject: Re: North Fork Valley Rural Historic District
Date: Tuesday, August 01, 2017 5:16:45 PM

Sorry, Megan. Our stance is one that no mitigation is possible. MVP needs to move outside the entire District. There's no point in meeting.

Anita

On Tue, Aug 1, 2017 at 11:16 AM, Neylon, Megan <MNeylon@eqt.com> wrote:

Anita,

Elizabeth (Betty) Hahn sent an email to Mountain Valley on July 26, 2017 stating that she has spoken to people interested in the North Fork Valley Rural Historic District and that they decline a meeting with Mountain Valley. Based on your email below, I wanted to reach out to you to see if you would still like to meet. If you would still be interested in meeting with Mountain Valley, I would like to set up a date and time. Please feel free to give me a call to discuss.

Thank you,

Megan E. Neylon

Supervisor - Permitting

Office: [724-873-3645](tel:724-873-3645)

MNeylon@eqt.com

From: Anita Puckett [mailto:anitampuckett@gmail.com]

Sent: Tuesday, July 25, 2017 10:00 AM

To: Neylon, Megan <MNeylon@eqt.com>; Sheriff, David <fires1957@yahoo.com>; Ann M Rogers <amelvin3@verizon.net>

Subject: North Fork Valley Rural Historic District

Dear Ms. Neylon,

A short message to let you know that I'm a representative of Preserve Montgomery who is

meet with Big Stony Historic District. If we could make it work, Mountain Valley could meet with you and others interested in Coles-Terry and Bent Mountain Historic Districts later in the afternoon on Thursday.

Thank you,

Megan E. Neylon
Supervisor - Permitting
Office: 724-873-3645
MNeylon@eqt.com

MOUNTAIN VALLEY PIPELINE PROJECT

HISTORIC PROPERTY TREATMENT PLAN
Greater Newport Rural Historic District (035-0412)

DOCKET NO. CP16-10
DHR FILE #2014 1194

Prepared for



555 Southpointe Boulevard
Canonsburg, Pennsylvania 15317

Prepared by



TETRA TECH

6 Century Drive, 3rd Floor
Parsippany, NJ 07054

August 2017

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1.0 INTRODUCTION

1.1 Project Overview

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, is seeking 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 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 Department 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 for the project, DHR issued its opinion in a letter dated July 7, 2017, that the proposed project will adversely affect the National Register of Historic Places (NRHP)-listed Greater Newport Rural Historic District (035-0412).¹ The FERC is consulting with the DHR on the treatment of historic properties that will be adversely impacted by the proposed Project. This Treatment Plan has been 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 Greater Newport Rural Historic District. This Treatment Plan also proposes mitigation measures designed to mitigate the adverse effects of the project.

Mountain Valley developed the direct and indirect Area of Potential Effect (APE) through consultation with the DHR. The indirect APE for historic architectural resources comprised, at a minimum, a 450-foot-wide corridor centered on the pipeline. In some areas, the APE was expanded up to one mile on either side of the pipeline in areas of higher elevation due to the possibility of distant views. The direct APE for the project was defined at the outset of the project as a 300-foot-

¹ As directed by DHR during an April 21, 2015, meeting between DHR and Mountain Valley's cultural resources consultant, Mountain Valley's architectural survey team did not re-inventory the previously recorded historic districts within the pipeline APE in Virginia.

wide corridor that would accommodate the actual construction right-of-way as well as workspace identified as project engineering and field surveys were completed.²

1.2 Project Effect

In accordance with Section 106 of the NHPA of 1966, as amended, Mountain Valley applied the Criteria of Adverse Effect to the Greater Newport Rural Historic District by synthesizing the results of visual, construction-related and operation-related effects assessments.

As noted in Sections 3.2 and 4.1 of Mountain Valley's Criteria of Effects Report (May 2017), rural historic landscapes may also qualify as a Traditional Cultural Property (TCP), as defined in the National Park Service's *Guidelines for Evaluating and Documenting Traditional Cultural Properties*, if the landscape's "organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents" or if it serves as a location "where a community has traditionally carried out economic, artistic, or other cultural practices important in maintaining its historic identity." A rural historic district's eligibility for the NRHP as a TCP hinges on how the sites, structures, buildings, surrounding landscape, and landscape elements are used by members of the community. As such, Mountain Valley's assessment of effects to the Greater Newport Rural Historic District's rural historic landscape involved an evaluation of direct and indirect (visual) effects to primary contributing resources within the historic district and also accounted for direct impacts on historic and current land uses, the results of which were presented in Section 4.1 of the Criteria of Effects Report.

This assessment resulted in a recommendation that changes in the rural historic landscape within the Greater Newport Rural Historic District as a result of the proposed project would not occur to an extent that would diminish the district's integrity. The project's permanent easement would, when possible, run parallel to existing utility rights-of-way and the district was determined eligible for the NRHP with these existing corridors in place. Mountain Valley noted in the Criteria of Effects Report that the proposed project's permanent easement could result in changes to the setting of the district. Mountain Valley further noted that woodlands similar to those of the Jefferson National Forest are predominant landscape features of the district and the NRHP nomination for the district states that these natural boundaries made by the forest are key in distinguishing the forest from land that is used for agricultural purposes. Based on a comparison of historic and current land use data, Mountain Valley recommended that most of the tree-clearing (approximately 82 percent of the length of the district crossed by the project) would occur in areas that were not historically forested. In other words, the forested areas that would be impacted, for the most part, are not key in distinguishing between historic land uses (forest from land that is used for agricultural purposes).

Furthermore, photograph simulations depicting potential views from the Greater Newport Rural Historic District toward the project demonstrated that the potential changes in the district's

² In a May 20, 2015, letter, DHR concurred that the indirect APE was appropriately defined and accurately reflected previous consultation.

viewshed and setting are “Inferior.” In other words, the potential visual impact is visually inferior within the context of the existing setting and surrounding landscape.

Although a part of the district would incur changes to its viewshed and setting as a result of the project, Mountain Valley recommended the Greater Newport 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 the district’s continuity of use. Furthermore, the three resources contributing to the district’s historic significance located within the project’s direct APE—the 1912 Sinking Creek Covered Bridge (035-0412-0245; 035-0005), Link Farm (035-0412-0244), and Cemetery (035-0412-0465)—are outside the project LOD and direct impacts on these resources would be avoided (Attachment 1).

Following careful study of the Project and its relationship to the Greater Newport Rural Historic District, and considering a full range of potential direct and indirect effects to the built environment and surrounding landscape, Mountain Valley recommended that the proposed project would have No Adverse Effect on the Greater Newport Rural Historic District.

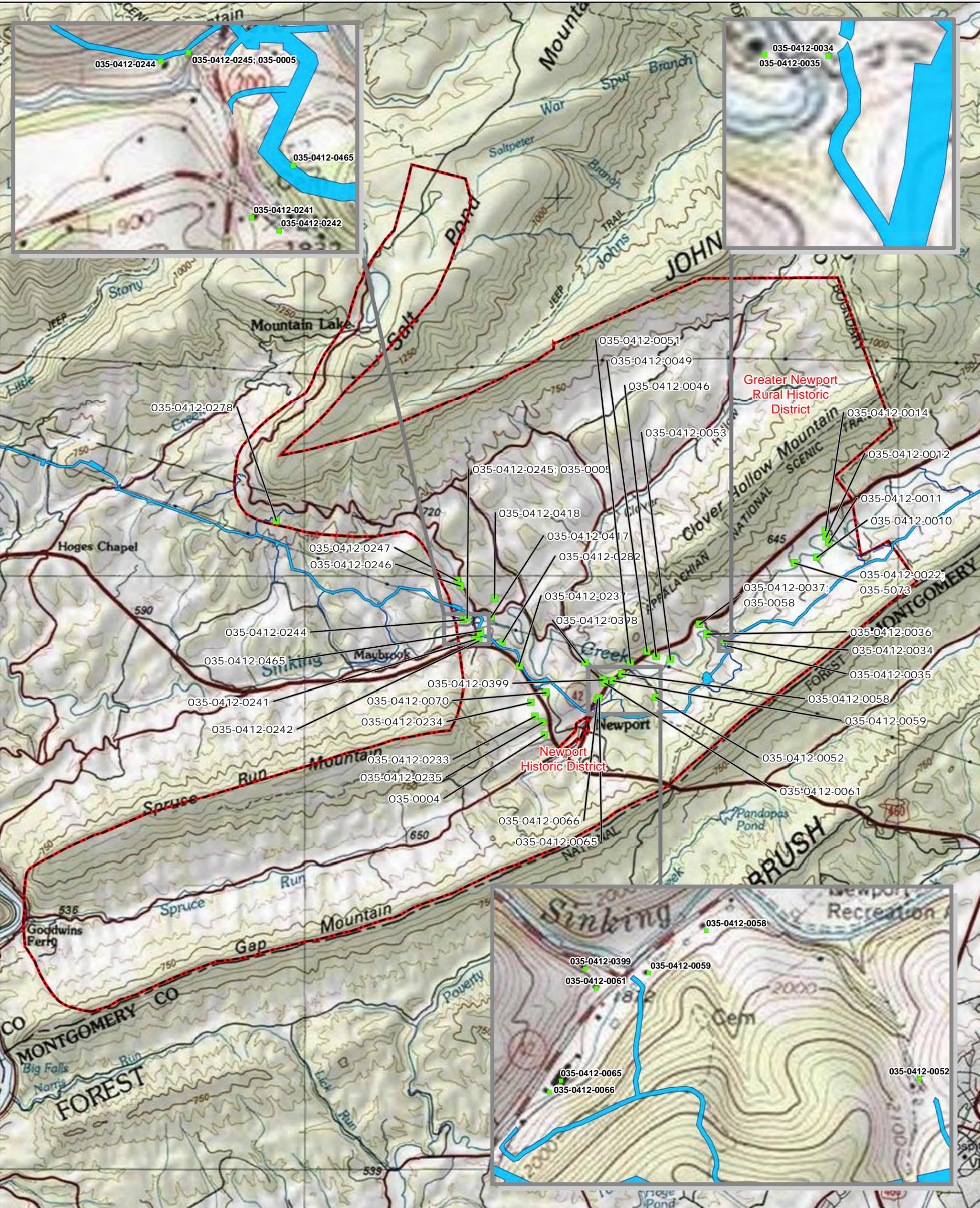
DHR found, in a letter dated July 7, 2017, that:

Based on the submitted analyses, DHR agrees with the consultant that the expected visual (indirect) impacts from Mountain Valley on the Newport Historic District, Greater Newport Rural Historic District, Big Stony Creek Historic District, Bent Mountain Rural Historic District, and Coles-Terry Rural Historic District do not significantly diminish those characteristics which make them eligible for listing in the NRHP.

...the Greater Newport Rural Historic District, Big Stony Creek Historic District, North Fork Valley Rural Historic District, 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.

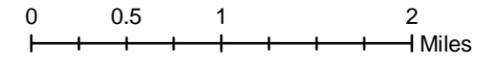
2.0 GREATER NEWPORT RURAL HISTORIC DISTRICT SETTING AND ASSOCIATION

The Greater Newport Rural Historic District is located in eastern Giles County. This district, comprising 21,371 acres, is situated along the ridges and valleys of Gap and Sinking Creek Mountains, Clover Hollow Valley, Johns Creek Mountain, and the ridge of Salt Pond Mountain, where Mountain Lake is located (Figure 1). The district was listed in the NRHP in 2000 under Criteria A and C. The period of significance is between 1745 and 1949. There are 762 inventoried contributing resources, and 540 non-contributing resources within the district boundaries. The NRHP district includes contiguous historic, agricultural, residential, industrial, educational and



Mountain Valley Pipeline Project

NAD 1983 UTM 17N



- Legend**
- Primary Contributing Historic Resource
 - Limit of Disturbance
 - Historic District Boundary

Proposed Route within the Greater Newport Rural Historic District

Figure 1

August 2017



Data Sources: ESRI 2017, USGS 2017.

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resort areas. The NRHP nomination established eight areas of significance for the district: architecture, agriculture, commerce, military history, iron mining, tourism and recreation, education, and transportation including early state highways, covered bridges, and railroads.

3.0 DESCRIPTION OF MOUNTAIN VALLEY AS IT AFFECTS PROPERTY SETTING AND ASSOCIATION

Mountain Valley proposes to cross the Greater Newport Rural Historic District at approximate milepost 211 of the project, for a distance of 32,553 feet, or 6.17 miles. Construction of the belowground pipeline and aboveground facilities will include short-term, long-term, and permanent impacts on the existing vegetation cover types. Only one proposed aboveground project facility, a main line valve, is located within the district's NRHP boundary and would be installed completely within the Project's permanent right-of-way. Effects related to vegetation removal within the rural historic landscape were among several issues that were the focus of consultation discussions with DHR and stakeholders. When feasible, project design plans have been modified in response to issues raised in public forums, project correspondence, and docket filings. Avoidance plans related to specific properties within the district are provided as Attachment 1. These plans were developed by Mountain Valley to avoid direct impacts on contributing historic properties and were accepted by the DHR in a letter dated July 7, 2017.

To the extent possible, the pipeline has been aligned parallel to existing utility rights-of-way and other linear features, and Mountain Valley will utilize existing access roads including private roads, drives, lanes, farm, or roads from previous construction to minimize clearing. Construction of the pipeline adjacent to existing rights-of-way will minimize impacts on vegetation by reducing trampling, compaction, land use change, tree clearing, and stump removal activities. The areas disturbed by construction will be restored to their original grades, condition and use or better, to the greatest extent practicable, in accordance with Project Specific Standards and Specifications approved by the Virginia Department of Environmental Quality (DEQ). Cleared vegetation will be restored using DEQ-approved native seed mixes, except in active agricultural lands that will be returned to their prior use.

Of the approximately 32,553 feet of the project within the Greater Newport Rural Historic District, only a few segments, crossing roadways, pastures, and some mountainous terrain (primarily along Highway 460 and State Route 614) that are located in areas that are accessible or that are visible to the public, or that are visible from a primary contributing historic resource.

Vegetation removal for the Mountain Valley has been minimized to the greatest practicable extent. However, as DHR concluded, project-related disturbances resulting from incompatible land use practices or resulting in the physical removal of vegetation within the rural historic landscape will affect the aspects of integrity of setting, feeling, and association for the Greater Newport Rural Historic District and, as a result, requires treatment.

4.0 MITIGATION OF ADVERSE EFFECTS IDENTIFIED

4.1 Approach to Development of Mitigation

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 adverse effect to be mitigated for the Greater Newport Rural Historic District is, according to DHR, the diminution in the “very agrarian setting and feeling” of the district resulting from the “permanent fifty-foot wide imprint on [its] landscape.” To further clarify this effect and assess its magnitude, it is important to note that DHR specifically stated that this effect does not arise from visual impacts on the landscape in the district. Aboveground impacts from this buried natural gas pipeline will be largely imperceptible following the restoration of the right-of-way, which will be periodically cleared of woody vegetation to protect the integrity of the pipeline.

Permanent impacts on the portions of the landscape not devoted to agriculture, and not in forest, 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 Greater Newport Rural Historic District these measures will result in the avoidance or restoration of approximately 14,306 feet (or 44 percent) of impacts.

In light of the largely temporary impacts to the physical landscape, additional changes to project construction or restoration practices will not effectively ameliorate the adverse effect identified by DHR on the agrarian feeling and setting of the district. Mountain Valley has identified a mitigation measure—development of a historic driving tour narrative of the district with associated materials—that will directly address the potential adverse effects identified by DHR to the “feeling” of the area for its residents and visitors and to the identified visual impact by educating residents and visitors about the historic and cultural significance of the district. This approach is proportional to the minimal long-term physical adverse effect to the agrarian portions of the district. It also is responsive to the desire expressed by stakeholders to foster tourism in the area by highlighting its historic and cultural significance.

4.2 Consultation with Consulting Parties and Other Stakeholders

The DHR recommended that the Mountain Valley assist the FERC with outreach to consulting parties and other stakeholders to identify appropriate mitigation measures for the adverse impacts on the Greater Newport Rural Historic District. Mountain Valley contacted David Brady, Section 106 Coordinator for the Greater Newport Rural Historic District Committee. Mr. Brady indicated in an email dated July 25, 2017, that after consulting with his steering committee, he believes it is premature to discuss mitigation measures and declined to meet with Mountain Valley. Mountain Valley contacted the Giles County Historical Society (GCHS) and held a meeting on July 27, 2017, at the GCHS. At that meeting, Executive Director of the GCHS, Joseph Yost, requested that Mountain Valley schedule a meeting with the GCHS Board of Directors. A meeting was scheduled

for August 15, 2017, at the GCHS in Pearisburg, to which GCHS was invited. Members of the Giles County Board of Supervisors were also invited to attend the meeting. Subsequently, Mr. Yost contacted Mountain Valley requesting that the meeting be postponed and, to date, the meeting has not been rescheduled. Mountain Valley is also corresponding with Mr. Matthew Fellerhoff, legal representative of the Greater Newport Rural Historic District Committee, in an attempt to set a date for a conference call. Appendix A contains copies of emails that document the discussions with consulting parties and stakeholders.

4.3 Proposed Mitigation Plan

In the meeting with the executive director of the historical society, Mr. Yost indicated that it was a goal of the county and the historical society to continue developing tourism for the county. As a result, the proposed mitigation plan has been focused on assisting the county with this goal. Mountain Valley proposes to provide funds to develop an approximately one-hour driving tour narrative for the Greater Newport Rural Historic District; create a tri-fold brochure that will include a map locating each historic property featured on the tour; and, establish way-finding signage that will align with the numbered sites on the brochure map and in the narrative. The driving tour narrative on compact disk will also be available by either podcast and/or online streaming, will emphasize one major theme, the district's association with agricultural development of the region, and two subthemes, the district's architectural history and the district's association with significant transportation networks. One hundred compact disks containing the driving tour narrative will be distributed to Giles County Tourism, the GCHS, the Greater Newport Rural Historic District Committee, and the Giles County Public Library to be, at their election, made available to the public or sold at a price to be determined by each entity and the profits from which would be retained by those organizations. A digital copy of the historic driving tour brochure will also be provided to be used at each organization's discretion (i.e. large format printing, web-publishing). In addition, 1,000 hard copies of the tour brochure will be distributed among the organizations. Way-finding signage corresponding with the numbered sites on the brochure map and in the narrative will be established at ten locations along publically accessible rights-of-way, to be determined in consultation with DHR and stakeholders and dependent upon landowner permission. If landowners do not consent to signage placement, locations will be limited to areas where the permanent Mountain Valley easement intersects public road rights-of-way. The narrative and the brochure will integrate historic writings, memoirs, recollections, and photographs provided by stakeholders into the tour's narrative.

Mountain Valley will afford the Greater Newport Rural Historic District Committee the opportunity to choose the qualified professional (meeting *Secretary of the Interior's Professional Qualification Standards*), administer the funds, and manage the qualified professional and deliverables. If the Greater Newport Rural Historic District Committee manages the implementation of the mitigation plan, it will adhere to all requirements of this document. If the committee declines to serve in this capacity, Mountain Valley will assume these responsibilities.

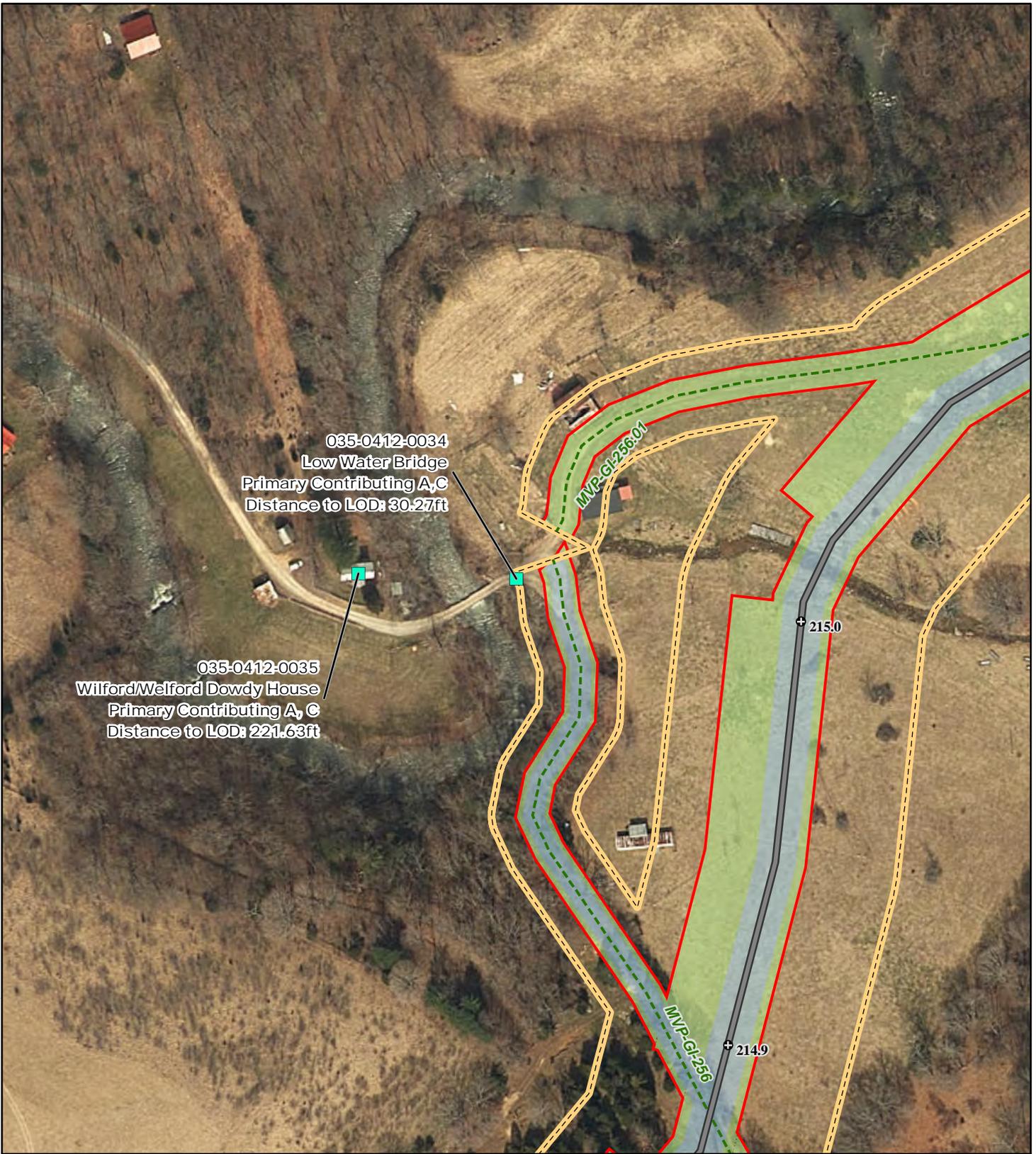
Mountain Valley will work with the DHR and interested stakeholders to finalize the scope of this Treatment Plan.

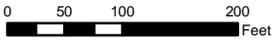
5.0 SCHEDULE

Within two months of issuance of the FERC Certificate for the project, Mountain Valley will develop and submit a final scope of work and cost estimate for the proposed driving tour narrative and supporting materials to the DHR for review and approval. The final scope of work and funding will be implemented accordingly (as outlined in Section 4.3 above) and all activities related to the Treatment Plan will be completed within two years of the date of the Certificate.

ATTACHMENT 1
AVOIDANCE PLANS

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Mountain Valley Pipeline Project	 NAD 1983 UTM 17N	
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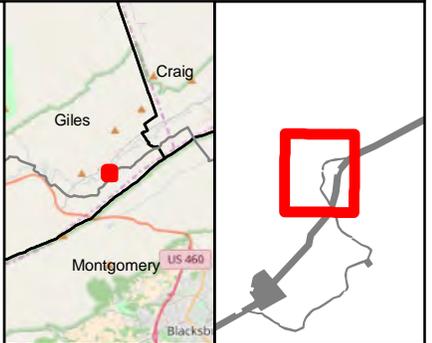


Avoidance Plan
Site: 035-0412-0034
Low Water Bridge
Giles County, Virginia

August 2017

Legend

-  Avoided Historical Architectural Resource
-  Milepost
-  Proposed Route
-  Access Road
-  Direct APE
-  Proposed Limits of Disturbance
-  Permanent Limit of Disturbance
-  Temporary Limit of Disturbance



Data Sources: USGS, ESRI, Open Street Map, VDHR.

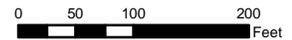
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Mountain Valley Pipeline Project



NAD 1983 UTM 17N



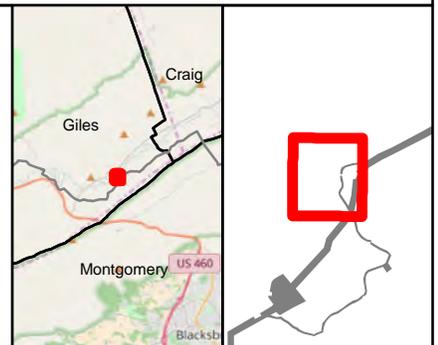
Avoidance Plan
Site: 035-0412-0035
Wilford/Welford Dowdy House
Giles County, Virginia

August 2017

Data Sources: USGS, ESRI, Open Street Map, VDHR.

Legend

-  Avoided Historical Architectural Resource
-  Milepost
-  Proposed Route
-  Access Road
-  Direct APE
-  Proposed Limits of Disturbance
-  Permanent Limit of Disturbance
-  Temporary Limit of Disturbance



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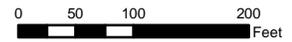


035-0412-0237
Fidel Smith Store
Primary Contributing A, C
Distance to LOD: 39.84ft

Mountain Valley Pipeline Project



NAD 1983 UTM 17N

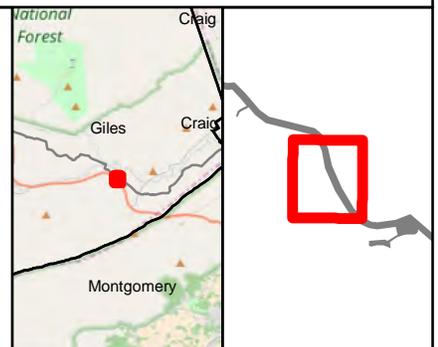


Avoidance Plan
Site: 035-0412-0237
Fidel Smith Store
Giles County, Virginia

August 2017

Legend

-  Avoided Historical Architectural Resource
-  Milepost
-  Proposed Route
-  Direct APE
-  Proposed Limits of Disturbance
-  Permanent Limit of Disturbance
-  Temporary Limit of Disturbance



Data Sources: USGS, ESRI, Open Street Map, VDHR.

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Mountain Valley Pipeline Project



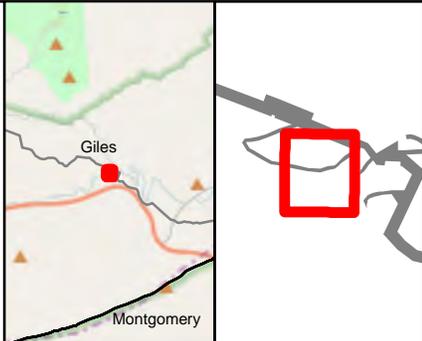
NAD 1983 UTM 17N




Avoidance Plan
Site: 035-0412-0245; 035-0005
1912 Sinking Creek Covered Bridge,
Link Farm
Giles County, Virginia

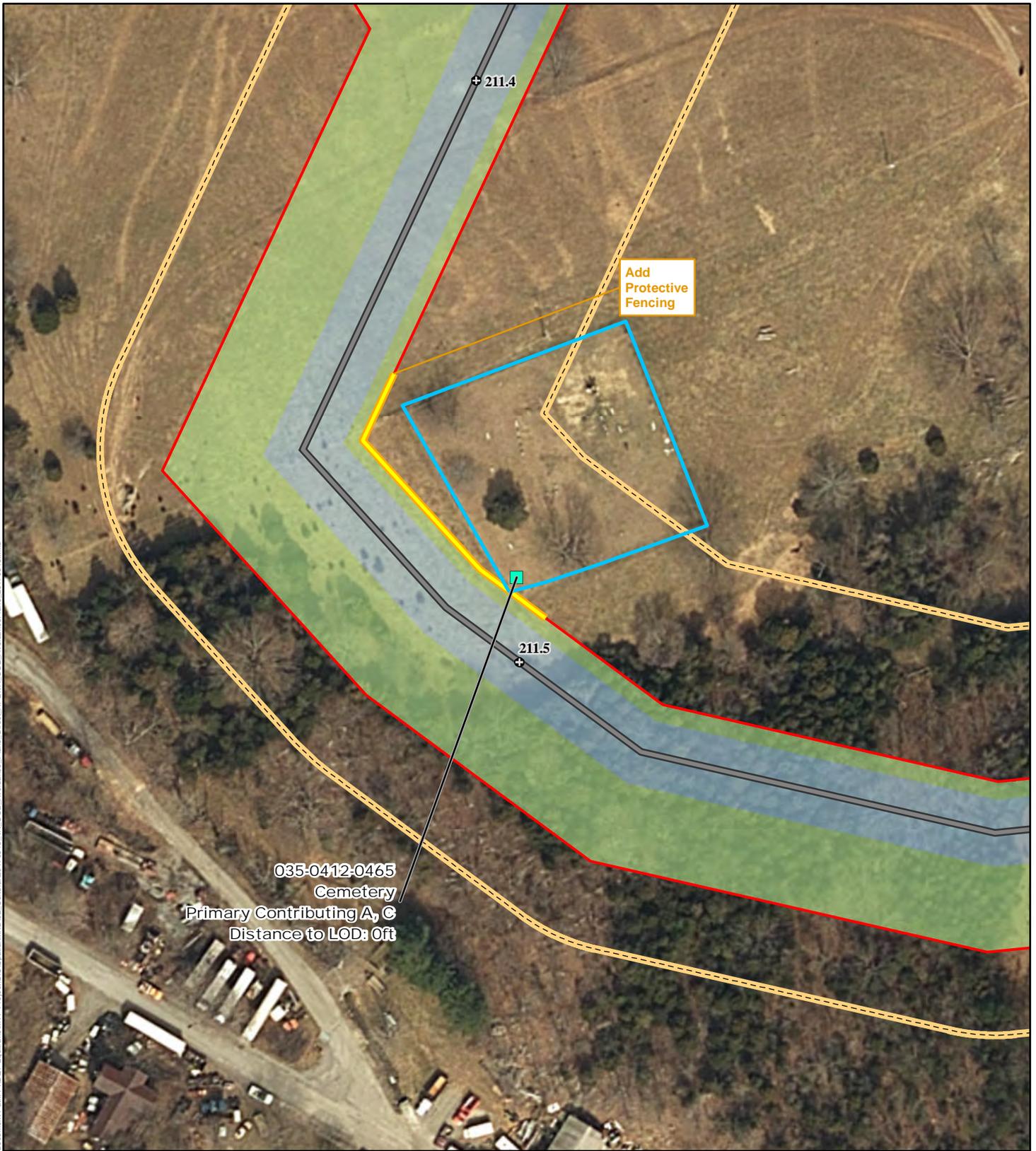
August 2017

- Legend**
-  Avoided Historical Architectural Resource
 -  Protective Fencing
 -  Proposed Route
 -  Access Road
 -  Direct APE
 -  Proposed Limits of Disturbance
 -  Permanent Limit of Disturbance
 -  Temporary Limit of Disturbance



Data Sources: USGS, ESRI, Open Street Map, VDHR.

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Mountain Valley Pipeline Project		NAD 1983 UTM 17N		0 50 100 200 Feet	
<p>Avoidance Plan Site: 035-0412-0465 Cemetery Giles County, Virginia</p> <p>August 2017</p> <p>Data Sources: USGS, ESRI, Open Street Map, VDHR.</p>	Legend Avoided Historical Architectural Resource Milepost Historical Architectural Resource Boundary Protective Fencing Proposed Route Direct APE Proposed Limits of Disturbance Permanent Limit of Disturbance Temporary Limit of Disturbance				

ATTACHMENT 2
CORRESPONDENCE

From: David Brady
To: [Neylon, Megan](#)
Cc: [roger kirchen](#); [emerritt](#); [jeddins](#); [Ann M Rogers](#); [Ricky McCoy, VT](#); [John Ross](#); [MWFellerhoff](#); [Deplazes](#); [Clarence Givens](#); [msw1mdw3](#); [Justin Sarafin](#)
Subject: Re: Mountain Valley Pipeline
Date: Tuesday, July 25, 2017 3:38:06 PM

Ms. Neylon,

Thanks for the email response and the SHPO's July 7, 2017 document. After consulting with the steering committee, we think it is premature to schedule a meeting to discuss mitigation of historic properties with you. As it relates to the Greater Newport Rural Historic District, the May 11, 2017 MVP report to which the SHPO has responded is so riddled with mislocated and misrepresented historic resources, as to render discussion of mitigation useless until the errors are corrected and adverse effects on these historic resources are correctly assessed. For example, we find it difficult to understand how we can meaningfully discuss mitigation of adverse effects to the historic Adlie Jones Farm (VDHR# 035-0412-0010), a contributing historic resource to the District directly affected by the pipeline project, when, after two and a half years of study, your team of experts cannot even correctly locate the Adlie Jones Farm in the report. As it relates to the District, there are many other examples of mislocated properties, misrepresented effects, and missing information in the report.

Similarly, the alternatives evaluation process is far from complete, as the SHPO's finding of adverse effects on five historic districts in the proposed route is a significant adverse effect that has not been considered by FERC in either the Final EIS, when compared to other system alternatives that avoid these districts entirely. Additionally, there methodological errors and missing assessments of cultural resources that still need to be addressed in the Final EIS, as discussed in the reports of Tom King and Preserve Roanoke/Bent Mountain, among others.

Finally, it is the Committee's understanding that FERC is the one that needs to be doing the outreach on Section 106, not MVP.

For future correspondence, my last name is Brady, not Grady.

Regards,

David Brady
Section 106 Coordinator
Greater Newport Rural Historic District Committee and
Preserve Newport Historic Properties

From: "Neylon, Megan" <MNeylon@eqt.com>
To: "David A Brady" <Flyngcow@Pemt.net>
Sent: Wednesday, July 19, 2017 6:55:43 AM
Subject: Mountain Valley Pipeline

Good morning Mr. Grady,

It was nice to speak with you yesterday. As discussed, I have attached the VDHR Criteria of Effects letter. This letter will be available on the docket no later than Monday July 24, 2017.

We are trying to reach out to a primary contact for the Greater Newport Rural Historic District to set a meeting to discuss potential impacts of the Mountain Valley Pipeline Project on the Greater Newport Rural Historic District and possible mitigation options should the project receive its FERC certificate.

We hope to set up a meeting with you and other interested parties the week of July 24th if at all possible. Please let us know if a day the week of the 24th is an option or if another day the following week is better for you. Please let me know if you have any questions. I can be reached at this email address or at the phone number below.

Thank you for your attention to this matter. We look forward to talking with you soon.

Megan E. Neylon
Supervisor - Permitting
Office: 724-873-3645
MNeylon@egt.com



August 24, 2017

Giles County Historical Society
Attn: Joseph R. Yost, MA, Executive Director
208 North Main Street
Pearisburg, Virginia 24134

**RE: Mountain Valley Pipeline
DHR File 2014-1194
FERC Docket CP16-10**

Dear Mr. Yost,

Thank you for meeting on July 27, 2017 to discuss potential cultural resource mitigation opportunities for the Mountain Valley Pipeline project. During that meeting, you communicated your preference to have a follow-up meeting with fellow members of the Historical Society Board of Giles County.

This meeting was confirmed via email (attached) on August 3, 2017, confirming an August 15, 2017 date for the meeting at the Giles County Historical Museum. In your email dated August 1, 2017 (attached) you requested that we invite Chris McKlarney, Giles County Administrator to the meeting. Megan Neylon reached out to Mr. McKlarney via telephone on August 3, 2017 and relayed the invitation to Mr. McKlarney's administrative assistant.

On August 9, 2017, John Ross, Giles County Zoning Administrator contacted Megan Neylon via phone stating that he was following up to the message left for Mr. McKlarney and that he would be attending the meeting in Mr. McKlarney's absence. Ms. Neylon relayed that the scope of the meeting was to discuss cultural resource mitigation options.

On August 14, 2017, Mr. Ross telephoned Ms. Neylon requesting a copy of the agenda for the August 15, 2017 meeting. Ms. Neylon provided the agenda via email (attached) dated August 14, 2017. In this email, Ms. Neylon also indicated that Mountain Valley would be filing initial cultural resource mitigation treatment plans with Virginia DHR and FERC on August 18, 2017, but that there would be additional opportunities for the Giles County Historical Board to provide input on these plans.

Unfortunately, the August 15, 2017 follow-up meeting, was postponed via email (attached) by you on the day of the meeting. Mountain Valley was prepared to have the meeting. In fact, our cultural resource consultant had flown from Michigan to Roanoke on August 14, 2017, specifically for these discussions with the Historical Society Board. We regret if there was any misunderstanding as to the purpose and scope of the meeting.

We also received feedback from Giles County Attorney, Richard Chidester, regarding the timing and scope of this meeting. To clarify, similar to our meeting with you on July 27, 2017, Mountain Valley's intent was to introduce initial mitigation treatment plans for the Big Stony and Greater Newport Historic Districts. These proposed plans were based in part on helpful input we received from you regarding the desire of the County and Historical Society to foster tourism in the area. We were then hoping to obtain additional

constructive feedback on the proposed treatment plans as well as to hear other potential mitigation ideas you or the Historical Society Board may have been considering.

The August 18, 2017 date that Mountain Valley identified as our date for submittal of the initial mitigation treatment plans to Virginia Department of Historic Resources and the Federal Energy Regulatory Commission needs to be clarified as well. Mountain Valley targeted that date for submittal of initial plans. As an update, the proposed plans are now expected to be submitted later this week. You and other consulting parties and stakeholders will receive copies of the plans for review at the same time. We will, of course, be requesting feedback from the Historical Society Board, as well as from other interested parties, on the plans.

We would like to reschedule this meeting as soon as practicably possible and we will make ourselves available at a date and time of your earliest convenience. We would like to sit down and discuss the Historical Society's initial response to the proposed plans and any other mitigation ideas you may have. We also will add other related issues to the meeting agenda if that is your preference. Please contact me at 412-417-3729 if you wish to further discuss. Thank you for your time and consideration.

Sincerely,



John J. Centofanti
Corporate Director, Environmental Affairs
Mountain Valley Pipeline, LLC
625 Liberty Avenue, Suite 1700
Pittsburgh, PA 15222
412-395-3305 (office)
412-417-3729 (cell)

cc: Giles County Board of Supervisors (c/o County Attorney Richard Chidester)

Centofanti, John

From: Neylon, Megan
Sent: Wednesday, August 23, 2017 12:01 PM
To: Centofanti, John
Subject: FW: Meeting

From: Joseph Yost [mailto:director@gilescountyhistory.org]
Sent: Wednesday, August 09, 2017 1:54 PM
To: Neylon, Megan <MNeylon@eqt.com>
Subject: RE: Meeting

Great! Thank you, Megan.

Cheers,
Joseph

From: Neylon, Megan [mailto:MNeylon@eqt.com]
Sent: Wednesday, August 9, 2017 9:25 AM
To: Joseph Yost <director@gilescountyhistory.org>
Subject: RE: Meeting

Good morning,

I wanted to let you know that I spoke with John Ross from the Giles County Commissioners office this morning. Unfortunately, Chris McKlarney will not be able to attend the meeting on Tuesday afternoon, but John will be attending in his place. We will see you on Tuesday!

Thank you,
Megan

From: Neylon, Megan
Sent: Thursday, August 03, 2017 4:13 PM
To: 'Joseph Yost' <director@gilescountyhistory.org>
Subject: RE: Meeting

Hi Joseph,

I apologize that it has taken me so long to get back to you. August 15th at 4 pm will work for us. We will plan to be at the Giles County Historical Society to present to the board. I will bring more legible maps this time! Please let me know if there is anything additional that we could have prepared for the board. I will give Chris a call and let him know but I think it would be helpful if you mention it as well if you see him before then!

Thank you,
Megan

Centofanti, John

From: Neylon, Megan
Sent: Wednesday, August 23, 2017 12:20 PM
To: Centofanti, John
Subject: FW: Mountain Valley Meeting

From: Neylon, Megan
Sent: Monday, August 14, 2017 3:24 PM
To: 'JRoss@GilesCounty.org' <JRoss@GilesCounty.org>
Subject: Mountain Valley Meeting

Mr. Ross,

Mountain Valley plans to bring a short presentation to the Giles County Historical Society tomorrow that will cover the following:

- Project Introduction and Overview
- Section 106 Schedule
- Mountain Valley's Proposed Route and Alternatives
- Routing Constraints
- Cultural Impacts to the Big Stony Creek Historic District as defined in the Virginia Department of Historic Resources letter (July 7, 2017)
- Cultural Impacts to the Greater Newport Rural Historic District as defined in the Virginia Department of Historic Resources letter (July 7, 2017)
- Mountain Valley's proposed mitigation options for Big Stony Creek and Greater Newport Rural Historic Districts

We would like to use a majority of this time for both the Giles County Historical Society and yourself to propose and discuss culturally relevant mitigation options that Mountain Valley may undertake to assist each district. Following this discussion, Mountain Valley will submit a mitigation plan to the Virginia Department of Historic Resources and FERC by August 18, 2017. Once you are able to have a conversation with the Giles County Board of Supervisors, we can revise the submitted plan to include any additional mitigation options agreed upon by the Board and Mountain Valley.

Please let me know if you have any additional questions. I look forward to meeting with you tomorrow.

Thank you,
Megan E. Neylon
Supervisor - Permitting
Office: 724-873-3645
MNeylon@eqt.com

Pearisburg, Virginia 24134

P: (540) 921-1050

<http://www.gilescountyhistory.org>

MOUNTAIN VALLEY PIPELINE PROJECT

HISTORIC PROPERTY TREATMENT PLAN
Big Stony Creek Historic District (035-5127)

DOCKET NO. CP16-10
DHR FILE #2014 1194

Prepared for



555 Southpointe Boulevard
Canonsburg, Pennsylvania 15317

Prepared by



TETRA TECH

6 Century Drive, 3rd Floor
Parsippany, NJ 07054

August 2017

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FIGURES

Figure 1 Proposed Route within Big Stony Creek Historic District

ATTACHMENTS

Attachment 1 Avoidance Plans

Attachment 2 Correspondence

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1.0 INTRODUCTION

1.1 Project Overview

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, is seeking 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 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 Department 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 for the project, DHR issued its opinion in a letter dated July 7, 2017, that the proposed project will adversely affect the Big Stony Creek Historic District (035-5127), a historic district determined eligible for the National Register of Historic Places (NRHP). The FERC is consulting with the DHR on the treatment of historic properties that will be adversely impacted by the proposed Project. This Treatment Plan has been 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 Big Stony Creek Historic District. This Treatment Plan also proposes mitigation measures designed to mitigate the adverse effects of the project.

Mountain Valley developed the direct and indirect Area of Potential Effect (APE) through consultation with the DHR. The indirect APE for historic architectural resources comprised, at a minimum, a 450-foot-wide corridor centered on the pipeline. In some areas, the APE was expanded up to one mile on either side of the pipeline in areas of higher elevation due to the possibility of distant views. The direct APE for the project was defined at the outset of the project as a 300-foot-wide corridor that would accommodate the actual construction right-of-way as well as workspace identified as project engineering and field surveys were completed.¹

¹ In a May 20, 2015, letter, DHR concurred that the indirect APE was appropriately defined and accurately reflected previous consultation.

Mountain Valley’s cultural resources consultants identified the Big Stony Creek Historic District (035-5127) in Giles County during the Phase I historic architecture survey conducted between May and November 2015. The district was surveyed comprehensively, with records made for resources over 50 years of age within the indirect APE for the project.²

1.2 Project Effect

In accordance with Section 106 of the NHPA of 1966, as amended, Mountain Valley applied the Criteria of Adverse Effect to the Big Stony Creek Historic District by synthesizing the results of visual, construction-related and operation-related effects assessments.

As noted in Sections 3.2 and 4.1 of Mountain Valley’s Criteria of Effects Report (May 2017), rural historic landscapes may also qualify as a Traditional Cultural Property (TCP), as defined in the National Park Service’s *Guidelines for Evaluating and Documenting Traditional Cultural Properties*, if the landscape’s “organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents” or if it serves as a location “where a community has traditionally carried out economic, artistic, or other cultural practices important in maintaining its historic identity.” A rural historic district’s eligibility for the NRHP as a TCP hinges on how the sites, structures, buildings, surrounding landscape, and landscape elements are used by members of the community. As such, Mountain Valley’s assessment of effects to the Big Stony Creek Historic District’s rural historic landscape involved an evaluation of direct and indirect (visual) effects to primary contributing resources within the historic district and also accounted for direct impacts on historic and current land uses, the results of which were presented in Section 4.1 of the Criteria of Effects Report.

This assessment resulted in a recommendation that changes in the rural historic landscape within the Big Stony Creek Historic District as a result of the proposed project would not occur to an extent that would diminish the district’s integrity. The project’s permanent easement would run parallel to, and would be largely co-located with, two existing high voltage power transmission corridors and the district was determined eligible for the NRHP with these existing transmissions corridors in place. Mountain Valley noted in the Criteria of Effects Report that the proposed project’s permanent easement (in the area where it parallels the two existing power transmission corridors but is not co-located with those corridors) could result in changes to the setting of the district. However, photograph simulations depicting potential views from the Big Stony Creek Historic District toward the Project demonstrate that the potential changes in the district’s viewshed and setting are “Inferior.” In other words, the potential visual impact is visually inferior within the context of the existing setting and surrounding landscape. Although a part of the district will incur changes to its viewshed and setting as a result of the Project, Mountain Valley recommended that these changes would not occur to an extent that would diminish the district’s integrity.

² Phase I Reconnaissance Architectural Survey for the Mountain Valley Pipeline, Craig and Giles Counties, Virginia (March 2016, DHR concurrence: May 25, 2016)

Mountain Valley recommended that the Big Stony Creek Historic District would continue to convey its rural, and industrial character and would continue to reflect the varying land uses through intact historic landscape features; the project would not affect the district's continuity of use. Although, one of the district's contributing resources, Big Stony Creek Railroad (035-5126) is located within the direct APE, direct impacts on the resource would be avoided by conventional boring.

Following careful study of the Project and its relationship to the Big Stony Creek Historic District, and considering a full range of potential direct and indirect effects to the built environment and surrounding landscape, Mountain Valley recommended that the proposed project would have No Adverse Effect on the Big Stony Creek Historic District.

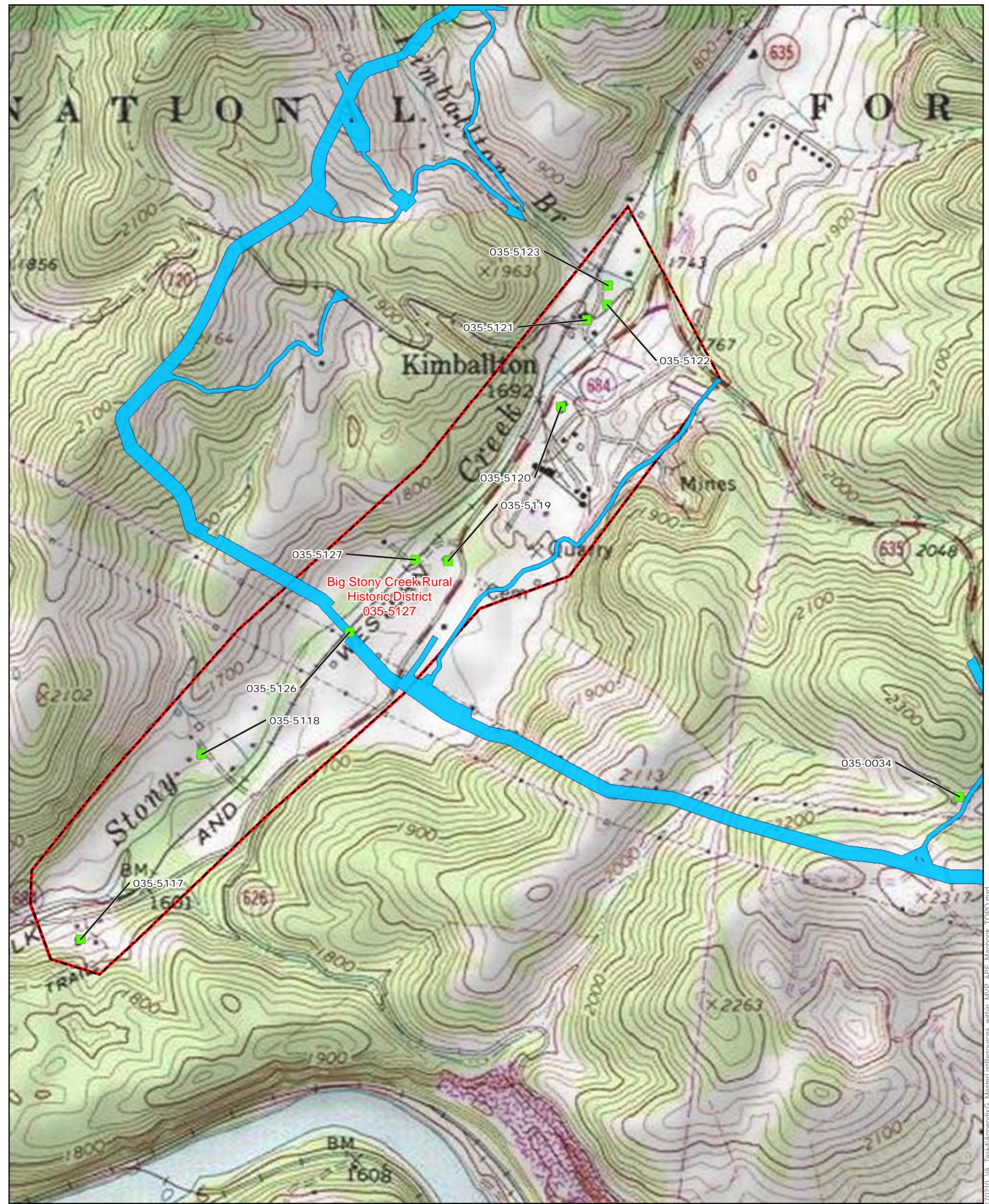
DHR found, in a letter dated July 7, 2017, that:

Based on the submitted analyses, DHR agrees with the consultant that the expected visual (indirect) impacts from Mountain Valley on the Newport Rural Historic District, Greater Newport Rural Historic District, Big Stony Creek Historic District, Bent Mountain Rural Historic District, and Coles-Terry Rural Historic District do not significantly diminish those characteristics which make them eligible for listing in the NRHP.

...the Greater Newport Rural Historic District, Big Stony Creek Historic District, North Fork Valley Rural Historic District, 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.

2.0 BIG STONY CREEK HISTORIC DISTRICT SETTING AND ASSOCIATION

During Phase I survey, Mountain Valley's cultural resources consultant recommended additional architectural survey and background research to evaluate Big Stony Creek Historic District's eligibility for listing in the NRHP according to Criteria A, C, and D. The NRHP-eligible Big Stony Creek Historic District encompasses the creek valley between the communities of Kimballton to the north and Norcross, on the east bank of a bend in the New River, to the south (Figure 1). The potential district is approximately 3.25 miles northeast of the Giles County seat of Pearisburg. Norcross Road (Route 684) and the Norfolk and Western Railroad (historically the Big Stony Railway), established in 1892, run down the center of the valley. The community developed due to its location in the fertile New River valley and its proximity to lime deposits. It matured around the historic railroad, which connected the New River in Giles County to the West Virginia border near Kire. Big Stony United Methodist Church (035-5119) and the McDonald Place (035-5118) were built in the early 1890s as the railroad came through the community. In 1905, the Norfolk and Western Railroad acquired the line. In 1934, the northern 34 miles of the line were abandoned



Mountain Valley Pipeline Project

NAD 1983 UTM 17N

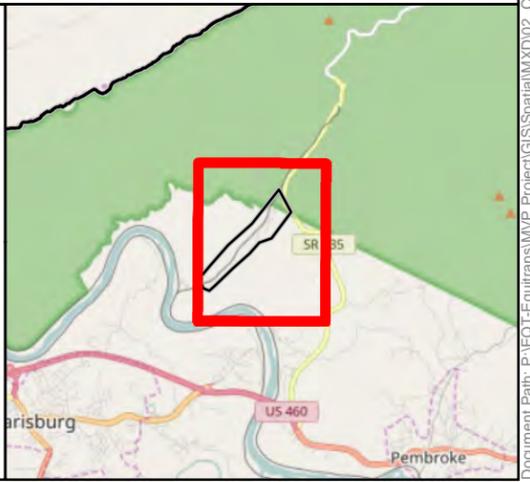
0 0.125 0.25 0.5 Miles



- Legend**
- Primary Contributing Historic Resource
 - Limit of Disturbance
 - Historic District Boundary

Proposed Route within Big Stony Creek Rural Historic District

Figure 1
April 2017



Data Sources: ESRI 2017, USGS 2017.

and the southern portion of the line through Kimballton and Norcross was operated to serve the Virginia Lime Plant (035-5120) at Kimballton. The plant is operated today by Lhoist North America. Rogers Road, at the district's north end, is the location of a cluster of mine worker housing, now privately owned, and a surviving circa-1890 boarding house (035-5121).

3.0 DESCRIPTION OF MOUNTAIN VALLEY AS IT AFFECTS PROPERTY SETTING AND ASSOCIATION

Mountain Valley proposes to cross the Big Stony Creek Historic District at approximate milepost 200.35 of the project, for a distance of 1,466 feet, or 0.28 mile. The proposed project's permanent easement would run parallel to, and would be partially co-located with, two existing high voltage power transmission corridors. The district was recommended for additional study during Phase I survey and recommended eligible for the NRHP with these existing transmissions corridors in place.

Construction of the belowground pipeline will include short-term, long-term, and permanent impacts on the existing vegetation cover types.³ As stated above, the proposed project's permanent easement (in the area in which it would parallels the two existing power transmission corridors but is not co-located with those corridors) will result in tree-clearing and could result in changes to the setting of the district. Effects related to vegetation removal within the rural historic landscape were among several issues that were the focus of consultation discussions with DHR and stakeholders. When feasible, project design plans have been modified in response to issues raised in public forums, project correspondence, and docket filings. An avoidance plan related to a specific property within the district is provided as Attachment 1. This plan was developed by Mountain Valley as avoidance of direct impacts on the contributing historic property and accepted by the DHR in a letter dated July 7, 2017.

Construction of the pipeline adjacent to, and co-located with, existing rights-of-way will minimize impacts on vegetation by reducing trampling, compaction, land use change, tree clearing, and stump removal activities. Mountain Valley will access the project area using existing roads, including private roads, drives, lanes, farm, or roads from previous construction to minimize clearing. The areas disturbed by construction will be restored to their original grades, condition and use or better, to the greatest extent practicable, in accordance with Project Specific Standards and Specifications approved by the Virginia Department of Environmental Quality (DEQ). Cleared vegetation will be restored using DEQ-approved native seed mixes, except in active agricultural lands that will be returned to their prior use.

Of the approximately 1,466 feet of the project within the Big Stony Creek Historic District, approximately 630 feet will be co-located within existing utility rights-of-way. Approximately 650 feet are in agricultural land that will be returned to its prior use, approximately 50 feet will be in non-wooded lands (e.g., meadow) that will be restored with native vegetation, and approximately 760 feet will be in forested areas.

³ No aboveground project facilities are proposed within the NRHP boundary for the Big Stony Creek Historic District.

Vegetation removal for the Mountain Valley has been minimized to the greatest practicable extent. However, the DHR concluded that project-related disturbances resulting from incompatible land use practices or resulting in the physical removal of vegetation within the rural historic landscape will affect the aspects of integrity of setting, feeling, and association for the Big Stony Creek Historic District and, as a result, requires treatment.

4.0 MITIGATION OF ADVERSE EFFECTS IDENTIFIED

4.1 Approach to Development of Mitigation

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 adverse effect to be mitigated for the Big Stony Creek Historical District is, according to DHR, the diminution in the “very agrarian setting and feeling” of the district resulting from the “permanent fifty-foot wide imprint on [its] landscape.” To further clarify this effect and assess its magnitude, it is important to note that DHR specifically stated that this effect does not arise from visual impacts on the landscape in the district. Aboveground impacts from this buried natural gas pipeline will be largely imperceptible following the restoration of the right-of-way—with the exception of the portions of the permanent right-of-way situated in currently forested areas (approximately 760 feet), which will be periodically cleared of woody vegetation to protect the integrity of the pipeline.

Nearly half of the pipeline’s route within the district (approximately 630 feet or 45 percent) is co-located within or adjacent to an existing utility right-of-way for high-voltage power lines, meaning that the character and use of the land will remain the same in those areas. Permanent impacts on the portions of the landscape not devoted to agriculture 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. Lastly, there will be no aboveground project facilities placed on the landscape within the district. In light of the largely temporary impacts on the physical landscape, additional changes to project construction or restoration practices will not effectively ameliorate the adverse effect identified by DHR on the agrarian feeling and setting of the district.

Mountain Valley has identified a mitigation measure—National Register nomination for the district—that will directly address the potential adverse effect identified by DHR to the “feeling” of the area for its residents and visitors by providing official recognition of its historic and cultural significance. Placement on the National Register would contribute to the future preservation of the agrarian setting and feeling of the district as well. This approach is proportional to the minimal long-term physical adverse effect to the district. It also is responsive to the desire expressed by stakeholders to foster tourism in the area by highlighting its historic and cultural significance.

4.2 Consultation with Consulting Parties and Other Stakeholders

The DHR recommended that the Mountain Valley assist the FERC with outreach to consulting parties and other stakeholders to identify appropriate mitigation measures for the adverse impacts on the Big Stony Creek Historic District. Mountain Valley contacted representatives of the Giles County Historical Society (GCHS), the Norfolk & Western Historical Society, the Committee for Appalachian and Piedmont Preservation, Giles County Board of Supervisors, and Preservation Virginia and held a meeting on July 27, 2017, at the GCHS. At that meeting, Executive Director of the GCHS, Joseph Yost, requested that Mountain Valley schedule a meeting with the GCHS Board of Directors. A meeting was scheduled for August 15, 2017, at the GCHS in Pearisburg, to which Giles County Board of Supervisors was invited. Subsequently, Mr. Yost contacted Mountain Valley requesting that the meeting be postponed and, to date, the meeting has not been rescheduled. Appendix A contains copies of telephone records, emails, and meeting minutes that document the discussions with consulting parties and stakeholders.

4.3 Proposed Mitigation Plan

In the meeting with the executive director of the historical society, Mr. Yost indicated that it was a goal of the county and the historical society to continue developing tourism for the county. As a result, the proposed mitigation plan has been focused on assisting the county with an initial step towards achieving this goal. Mountain Valley's proposed mitigation plan to address potential adverse effects is to fund the preparation of a National Register nomination for the district by a qualified historian or architectural historian meeting the *Secretary of the Interior's Professional Qualification Standards*. The nomination will allow the proposed Big Stony Creek Historic District to be designated as a NRHP-listed historic district. The designation of the Big Stony Creek Historic District will allow Giles County to preserve its character through historic preservation programs. Historic preservation programs, used as an economic development tool, will enable Giles County to take advantage of its history and, in combination with the county's other NRHP-listed historic districts, further develop a tourism market.

As there is no committee or point of contact specific to the district, Mountain Valley will afford the GCHS, Giles County Board of Supervisors, and Preservation Virginia the opportunity to, individually or collectively, choose the qualified professional, administer the funds, and manage the qualified professional (meeting *Secretary of Interior's Professional Qualification Standards*) and deliverables. If an outside organization manages the implementation of the mitigation plan, it will adhere to all requirements of this document. If these organizations decline to serve in this capacity, Mountain Valley will assume these responsibilities.

Mountain Valley will work with the DHR to finalize the scope for the National Register nomination; however, Mountain Valley assumes that, based on initial research and evaluation, the qualified professional will propose an approximate National Register Boundary and Period of Significance for a National Register historic district. Subsequent to DHR review and approval of the recommended boundary, it is assumed that the professional will prepare a complete National Register nomination for the historic district following all National Register guidelines and requirements. Minimally, the qualified professional, in consultation with DHR, will:

1. Review existing survey, historical research, publications, and architectural traditions related to the district;
2. Propose an approximate Period of Significance and Boundary for a National Register historic district;
3. Produce 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;
4. Prepare draft National Register nomination (although not anticipated, a second draft submission may be required at the discretion of the DHR, if warranted due to substantive comments);
5. Prepare final National Register nomination subsequent to DHR review of the draft National Register nomination: three (3) hard copies and one (1) digital copy (Microsoft® Office Word format) of the completed final nomination form and all accompanying material (in appropriate formats)
6. Prepare 2 sets of address labels for all current property owners within the proposed National Register historic district at the time of submission for use by the DHR in nomination-related correspondence.

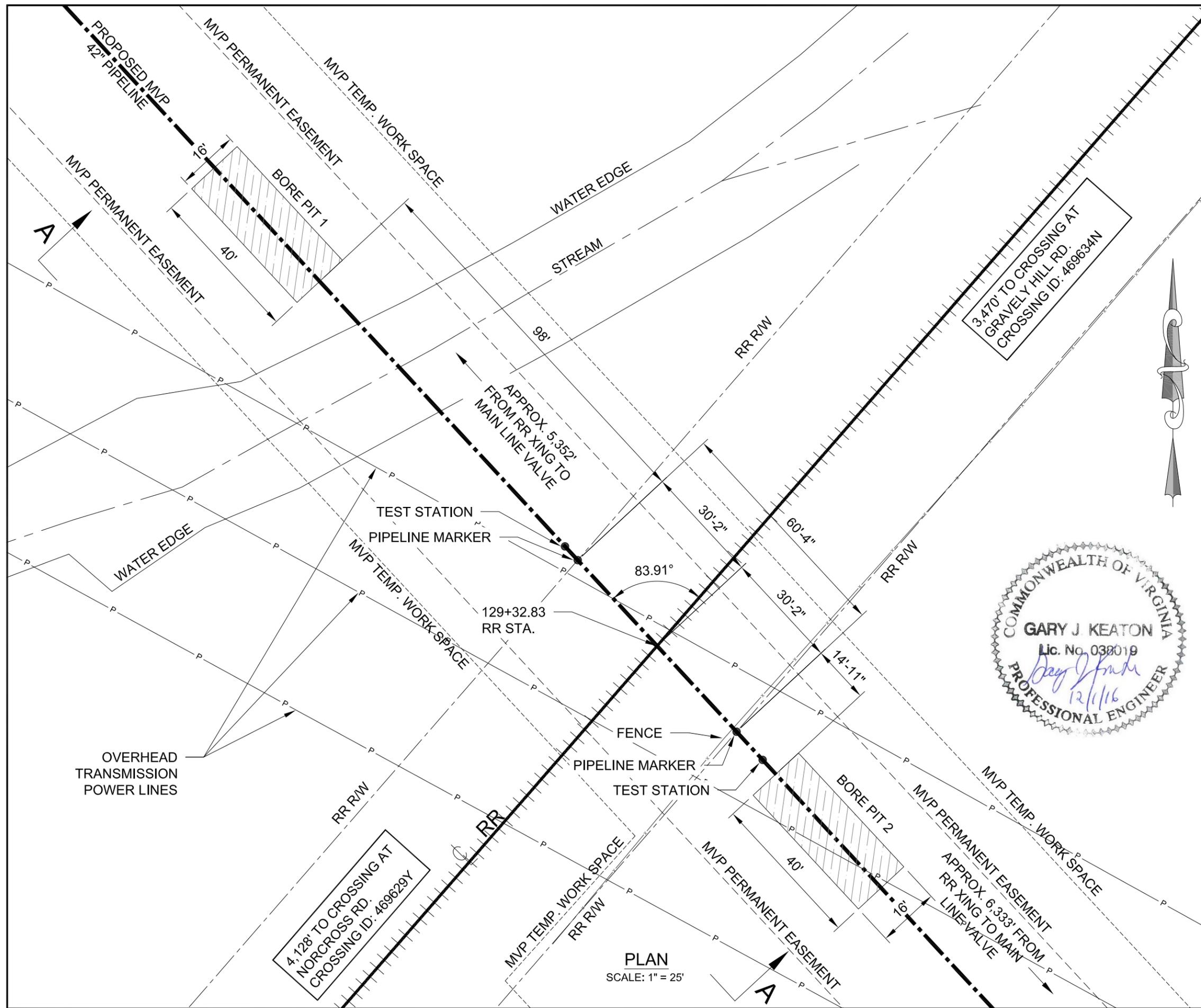
5.0 SCHEDULE

Within two months of issuance of the FERC Certificate for the project, Mountain Valley will develop and submit a final scope of work and cost estimate for the National Register nomination to the DHR for review and approval. The final scope of work and funding will be implemented accordingly (as outlined in Section 4.3 above) and all activities related to the Treatment Plan will be completed within two years of the date of the Certificate.

ATTACHMENT 1
AVOIDANCE PLANS

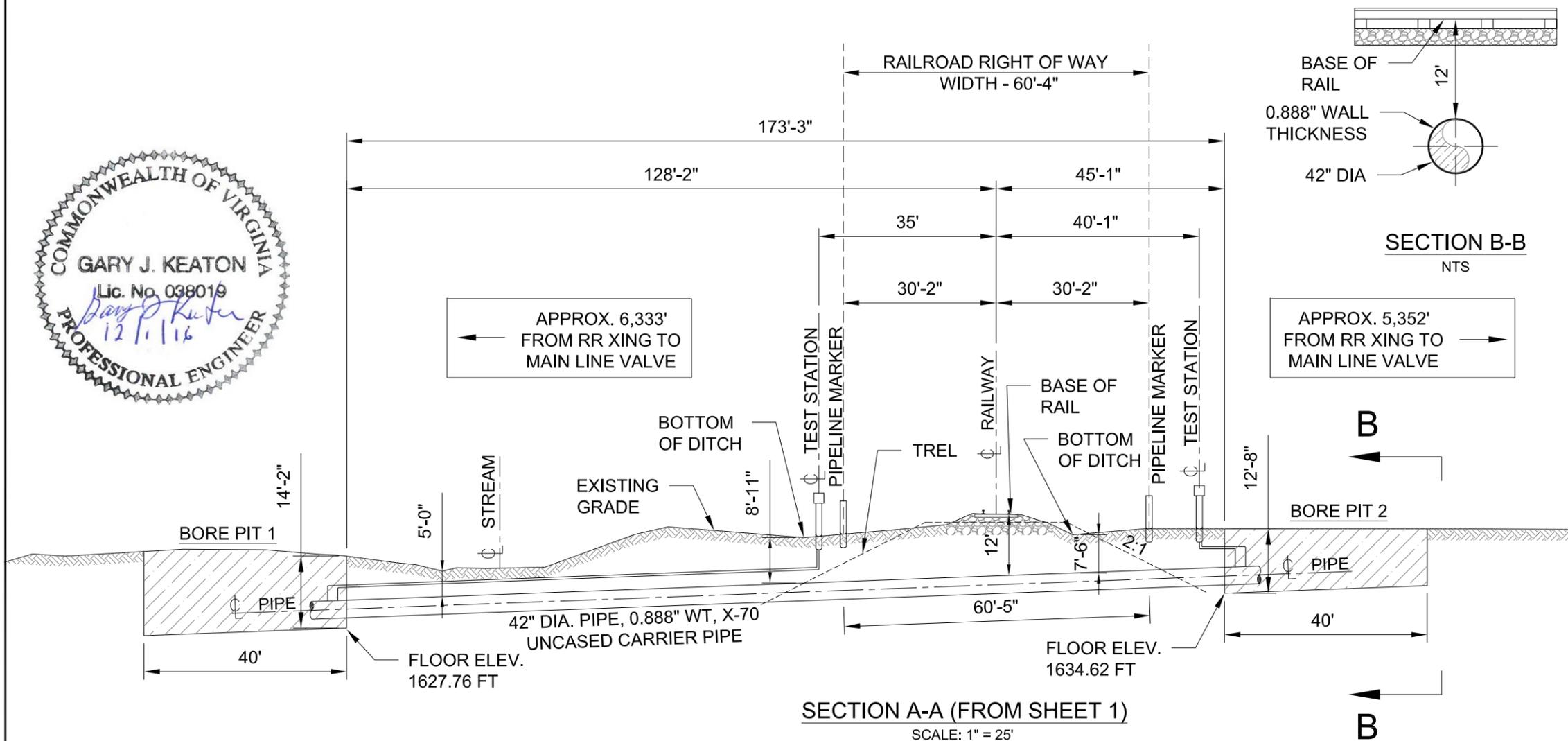
NOTES:

1. Pipeline will be installed using "Jack and Bore" method.
2. The boring operation shall be progressed on a 24-hour basis without stoppage (except for adding lengths of pipe) until the leading edge of the pipe has reached the receiving pit.
3. The front of the pipe shall be provided with mechanical arrangements or devices that will positively prevent the auger from leading the pipe so that no unsupported excavation is ahead of the pipe.
4. The auger and cutting head arrangement shall be removable from within the pipe in the event an obstruction is encountered.
5. If the over-cut by the cutting head exceeds the outside diameter of the pipe by more than 1 inch, grouting or other methods approved by Norfolk Southern shall be employed.
6. The face of the cutting head shall be arranged to provide a reasonable obstruction to the free flow of soft or poor material.
7. Inspection and strength testing of the pipeline will be in accordance with 49 CFR Part 192.
8. 100% of all field welds shall be inspected by radiographic examination, for 100% of the circumference.
9. A pipeline marker shall be installed on each side of the crossing, just outside the railroad right-of-way.
10. Cathodic protection test stations will be installed on each end of the bore section.
11. Contractor shall follow all requirements of Norfolk Southern's NSCE-8 specifications.
12. Pipeline and crossing to be installed and maintained in accordance with last approved American Railway Engineering and Maintenance-of-Way Association (AREMA) specifications for pipelines conveying flammable and non-flammable substances.
13. Blasting not permitted.



Location:	Kimballton, Giles County VA	
Latitude:	37.359855 N	
Longitude:	80.683707 W	
Drawing No.:	199.4 - 1	Sheet 1 of 2
Drawing Date:	8/9/16	Last Revised: 12/1/16
Drawing Scale:	1	Inches = 25 Feet

PLAN
SCALE: 1" = 25'



NOTES:

1. Pipeline will be installed using "Jack and Bore" method.
2. The boring operation shall be progressed on a 24-hour basis without stoppage (except for adding lengths of pipe) until the leading edge of the pipe has reached the receiving pit.
3. The front of the pipe shall be provided with mechanical arrangements or devices that will positively prevent the auger from leading the pipe so that no unsupported excavation is ahead of the pipe.
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9. A pipeline marker shall be installed on each side of the crossing, just outside the railroad right-of-way.
10. Cathodic protection test stations will be installed on each end of the bore section.
11. Contractor shall follow all requirements of Norfolk Southern's NSCE-8 specifications.
12. Pipeline and crossing to be installed and maintained in accordance with last approved American Railway Engineering and Maintenance-of-Way Association (AREMA) specifications for pipelines conveying flammable and non-flammable substances.
13. Blasting not permitted.

ADDITIONAL NOTES/INFORMATION:

- A. MVP design wall thickness (0.888") greater than minimum wall thickness (0.781") required per AREMA, Ch 1 Part 5, Section 5.2.3.
- B. All excavated areas are to be illuminated (flashing warning lights not permitted), fenced, and otherwise protected as directed by Norfolk Southern.
- C. All mainline valves on the MVP pipeline will be spaced in compliance with DOT Part 192 regulations, remotely operable, monitored continuously, and fully equipped with back-up power and communications.

PIPELINE CONTENT DETAILS

Commodity Description:	NATURAL GAS
Maximum Operating Pressure:	1480 PSIG
Is Commodity Flammable:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

CARRIER PIPE DETAILS

Carrier Pipe	CARBON STEEL
Pipe Material:	API-5L X-70
Material Specifications & Grade:	70,000 PSI
Specified Minimum Yield Strength:	42
Nominal Size Outside Diameter (Inches):	0.888
Wall Thickness (Inches):	LSAW
Type of Seam:	BUTT WELD, FULL CIRCUMFERENCE
Type of Joints:	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Tunnel Liner Plates Required:	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Type: IMPRESSED CURRENT FROM RECTIFIER/GROUNDBEDS
Cathodic Protection:	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Type: FUSION BOND EPOXY + ABRASION RESISTANCE OVERLAY
Protective Coating:	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Temp. Track Support or Rip-Rap Req.:	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes



Location:	Kimballton, Giles County VA
Latitude:	37.359855 N
Longitude:	80.683707 W
Drawing No.:	199.4-2 Sheet 2 of 2
Drawing Date:	8/9/16 Last Revised: 12/1/16
Drawing Scale: V	1 Inches = 25 Feet
Drawing Scale: H	1 Inches = 25 Feet

ATTACHMENT 2
CORRESPONDENCE



TELEPHONE / PERSONAL CONVERSATION REPORT

PROJECT NAME:	MVP Historic Districts
MVP TEAM CALLER:	Megan Neylon
CONVERSATION WITH:	Joseph Yost
AGENCY:	Big Stony Mountain Historic District
EMAIL ADDRESS:	
PHONE NUMBER:	504-921-1050
SUBJECT:	Meeting to discuss impacts to the Big Stony Historic District and mitigation for those impacts
DATE AND TIME:	Various

SUMMARY OF CONVERSATION:

7/17/17 – 1:51 PM left a message with the Giles County Historical Society explaining the reason for the phone call and requesting a call back. Giles County historical society is only open Wed, Thurs, Friday, and Saturday. I left a message for Joseph Yost to call me back but will try again tomorrow (in case someone is in the office) and Wednesday. If there is no return call by Wednesday afternoon 7/19/17, I will move on to the Norfolk & Western Historical Society.

7/19/17 – 2:57 PM Mr. Yost is out of the office and will return on 7/20/17. Left a message with administrative assistant.

7/20/17 – 2:09 PM discussion with Joseph Yost. Meeting scheduled for 7/27/17

7/20/17 – 4:09 PM Follow up email confirming the meeting and attendants

7/20/17 – 4:36 PM Follow up email confirming the meeting and attendants

7/20/17 – 4:59 PM Follow up email confirming the meeting and attendants

7/21/17 – 2:04 PM Called Ron Davis from the Norfolk & Western Historical Society. I informed Mr. Davis of the meeting scheduled for 11 am on 7/27/17. Mr. Davis said that he would speak to Mr. Yost and may or may not attend.

7/21/17 – 2:09 PM Called Ann Rogers from Committee for Appalachian and Piedmont Preservation. I informed Ms. Rogers of the meeting scheduled for 11 am on 7/27/17. Ms. Rogers expects to attend.



7/21/17 – 2:30 PM Called and left a voicemail for Chris McKlarney of the Giles County Board of Supervisors informing him of the meeting.

7/21/17 - 2:35 PM Called and left a voicemail for Lisa Bergstrom of Preserve Virginia informing her of the meeting.

7/24/17 – 1:06 PM Returned a call from Sonja Ingram of Preserve Virginia letting me know that Preserve Virginia cannot attend the meeting scheduled for 7/27/17 but would like to be invited to attend any others. Sonja would also like a follow-up recap phone call after the Big Stony Creek meeting.

7/27/17 – 11:00 am Meeting with Delegate Yost. During the meeting Delegate Yost identified a location within the Big Stony Creek Historic District that may contain a colonial fort. We discussed several mitigation options but Delegate Yost would like for MVP to come back and discuss these options with the Giles County Historical Society Board possibly on 8/15 or 8/17. This may give MVP an opportunity to mitigate adverse effects to Big Stony and Greater Newport historic districts in Giles County.

7/27/17 – 2:54 PM Email received from Sonja Ingram regarding concerns with an incomplete FEIS and incomplete studies at historical sites in Franklin County.

8/15/17 – 4:00 PM Meeting scheduled with the Giles County Historical Society Board.

Contact Signature: _____



**Meeting with Giles County Historical Society
Mitigation for Adverse Effect – Big Stony Creek Historic District
28 July 2017**

MEETING NOTES

Meeting Attendees:

Joseph Yost (Director Giles County Historical Society)

John Centofanti (EQT – MVP Director of Environmental)

Megan Neylon (EQT – MVP Supervisor – Permitting)

Evelyn Tidlow (GAI Consultants – Cultural Resources and FERC Specialist)

Meeting Began at 11:00 AM

Introductions

- Participants introduced themselves, providing some background information and current role in the project.

Review of Project

- John Centofanti presented a brief overview of the project and the current schedule.
- John and Megan Neylon presented a discussion of the route alternatives studied for the project.
- Joseph Yost indicated that there was historical documentation related to a Revolutionary War fort that was probably located within the proposed district boundaries but outside the direct APE for this project.

Big Stony Creek Historic District

- All attendees had a general discussion of the Big Stony Creek Historic District regarding the survey and resources included in the district.
- Ideas related to potential mitigation were discussed including preparation of a National Register Nomination for the district, development of educational materials for the schools, possible information that would assist Giles County in the goal of increasing tourism, signage and tour for historic sites related to Big Stony, and Revolutionary War fort reconstruction on the Giles County Historical Society grounds.

- Joseph Yost indicated that he would like to arrange a meeting for Mountain Valley to make a similar presentation to the historical society board. He agreed to contact the board and try to arrange a meeting for the week of August 14, 2017.

Greater Newport Rural Historic District

- Attendees had a brief discussion related to Mountain Valley's attempts to set up a meeting with individuals interested in the Greater Newport Rural Historic District. Joseph indicated that he would contact several individuals that may have interest and try to persuade them to attend a meeting with Mountain Valley.

Meeting adjourned at approximately 12:30 PM



August 24, 2017

Giles County Historical Society
Attn: Joseph R. Yost, MA, Executive Director
208 North Main Street
Pearisburg, Virginia 24134

**RE: Mountain Valley Pipeline
DHR File 2014-1194
FERC Docket CP16-10**

Dear Mr. Yost,

Thank you for meeting on July 27, 2017 to discuss potential cultural resource mitigation opportunities for the Mountain Valley Pipeline project. During that meeting, you communicated your preference to have a follow-up meeting with fellow members of the Historical Society Board of Giles County.

This meeting was confirmed via email (attached) on August 3, 2017, confirming an August 15, 2017 date for the meeting at the Giles County Historical Museum. In your email dated August 1, 2017 (attached) you requested that we invite Chris McKlarney, Giles County Administrator to the meeting. Megan Neylon reached out to Mr. McKlarney via telephone on August 3, 2017 and relayed the invitation to Mr. McKlarney's administrative assistant.

On August 9, 2017, John Ross, Giles County Zoning Administrator contacted Megan Meylon via phone stating that he was following up to the message left for Mr. McKlarney and that he would be attending the meeting in Mr. McKlarney's absence. Ms. Neylon relayed that the scope of the meeting was to discuss cultural resource mitigation options.

On August 14, 2017, Mr. Ross telephoned Ms. Neylon requesting a copy of the agenda for the August 15, 2017 meeting. Ms. Nelyon provided the agenda via email (attached) dated August 14, 2017. In this email, Ms. Neylon also indicated that Mountain Valley would be filing initial cultural resource mitigation treatment plans with Virginia DHR and FERC on August 18, 2017, but that there would be additional opportunities for the Giles County Historical Board to provide input on these plans.

Unfortunately, the August 15, 2017 follow-up meeting, was postponed via email (attached) by you on the day of the meeting. Mountain Valley was prepared to have the meeting. In fact, our cultural resource consultant had flown from Michigan to Roanoke on August 14, 2017, specifically for these discussions with the Historical Society Board. We regret if there was any misunderstanding as to the purpose and scope of the meeting.

We also received feedback from Giles County Attorney, Richard Chidester, regarding the timing and scope of this meeting. To clarify, similar to our meeting with you on July 27, 2017, Mountain Valley's intent was to introduce initial mitigation treatment plans for the Big Stony and Greater Newport Historic Districts. These proposed plans were based in part on helpful input we received from you regarding the desire of the County and Historical Society to foster tourism in the area. We were then hoping to obtain additional

constructive feedback on the proposed treatment plans as well as to hear other potential mitigation ideas you or the Historical Society Board may have been considering.

The August 18, 2017 date that Mountain Valley identified as our date for submittal of the initial mitigation treatment plans to Virginia Department of Historic Resources and the Federal Energy Regulatory Commission needs to be clarified as well. Mountain Valley targeted that date for submittal of initial plans. As an update, the proposed plans are now expected to be submitted later this week. You and other consulting parties and stakeholders will receive copies of the plans for review at the same time. We will, of course, be requesting feedback from the Historical Society Board, as well as from other interested parties, on the plans.

We would like to reschedule this meeting as soon as practicably possible and we will make ourselves available at a date and time of your earliest convenience. We would like to sit down and discuss the Historical Society's initial response to the proposed plans and any other mitigation ideas you may have. We also will add other related issues to the meeting agenda if that is your preference. Please contact me at 412-417-3729 if you wish to further discuss. Thank you for your time and consideration.

Sincerely,



John J. Centofanti
Corporate Director, Environmental Affairs
Mountain Valley Pipeline, LLC
625 Liberty Avenue, Suite 1700
Pittsburgh, PA 15222
412-395-3305 (office)
412-417-3729 (cell)

cc: Giles County Board of Supervisors (c/o County Attorney Richard Chidester)

Centofanti, John

From: Neylon, Megan
Sent: Wednesday, August 23, 2017 12:01 PM
To: Centofanti, John
Subject: FW: Meeting

From: Joseph Yost [mailto:director@gilescountyhistory.org]
Sent: Wednesday, August 09, 2017 1:54 PM
To: Neylon, Megan <MNeylon@eqt.com>
Subject: RE: Meeting

Great! Thank you, Megan.

Cheers,
Joseph

From: Neylon, Megan [mailto:MNeylon@eqt.com]
Sent: Wednesday, August 9, 2017 9:25 AM
To: Joseph Yost <director@gilescountyhistory.org>
Subject: RE: Meeting

Good morning,

I wanted to let you know that I spoke with John Ross from the Giles County Commissioners office this morning. Unfortunately, Chris McKlarney will not be able to attend the meeting on Tuesday afternoon, but John will be attending in his place. We will see you on Tuesday!

Thank you,
Megan

From: Neylon, Megan
Sent: Thursday, August 03, 2017 4:13 PM
To: 'Joseph Yost' <director@gilescountyhistory.org>
Subject: RE: Meeting

Hi Joseph,

I apologize that it has taken me so long to get back to you. August 15th at 4 pm will work for us. We will plan to be at the Giles County Historical Society to present to the board. I will bring more legible maps this time! Please let me know if there is anything additional that we could have prepared for the board. I will give Chris a call and let him know but I think it would be helpful if you mention it as well if you see him before then!

Thank you,
Megan

Centofanti, John

From: Neylon, Megan
Sent: Wednesday, August 23, 2017 12:20 PM
To: Centofanti, John
Subject: FW: Mountain Valley Meeting

From: Neylon, Megan
Sent: Monday, August 14, 2017 3:24 PM
To: 'JRoss@GilesCounty.org' <JRoss@GilesCounty.org>
Subject: Mountain Valley Meeting

Mr. Ross,

Mountain Valley plans to bring a short presentation to the Giles County Historical Society tomorrow that will cover the following:

- Project Introduction and Overview
- Section 106 Schedule
- Mountain Valley's Proposed Route and Alternatives
- Routing Constraints
- Cultural Impacts to the Big Stony Creek Historic District as defined in the Virginia Department of Historic Resources letter (July 7, 2017)
- Cultural Impacts to the Greater Newport Rural Historic District as defined in the Virginia Department of Historic Resources letter (July 7, 2017)
- Mountain Valley's proposed mitigation options for Big Stony Creek and Greater Newport Rural Historic Districts

We would like to use a majority of this time for both the Giles County Historical Society and yourself to propose and discuss culturally relevant mitigation options that Mountain Valley may undertake to assist each district. Following this discussion, Mountain Valley will submit a mitigation plan to the Virginia Department of Historic Resources and FERC by August 18, 2017. Once you are able to have a conversation with the Giles County Board of Supervisors, we can revise the submitted plan to include any additional mitigation options agreed upon by the Board and Mountain Valley.

Please let me know if you have any additional questions. I look forward to meeting with you tomorrow.

Thank you,
Megan E. Neylon
Supervisor - Permitting
Office: 724-873-3645
MNeylon@eqt.com

Pearisburg, Virginia 24134

P: (540) 921-1050

<http://www.gilescountyhistory.org>

MOUNTAIN VALLEY PIPELINE PROJECT

HISTORIC PROPERTY TREATMENT PLAN
North Fork Valley Rural Historic District (060-0574)

DOCKET NO. CP16-10
DHR FILE #2014 1194

Prepared for



555 Southpointe Boulevard
Canonsburg, Pennsylvania 15317

Prepared by



TETRA TECH

6 Century Drive, 3rd Floor
Parsippany, NJ 07054

August 2017

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FIGURES

Figure 1 Proposed Route within North Fork Valley Rural Historic District

APPENDICES

Attachment 1 Avoidance Plans
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1.0 INTRODUCTION

1.1 Project Overview

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, is seeking 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 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 Department 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 for the project, DHR issued its opinion in a letter dated July 7, 2017, that the proposed project will adversely affect the National Register of Historic Places (NRHP)-listed North Fork Valley Rural Historic District (060-0574).¹ The FERC is consulting with the DHR on the treatment of historic properties that will be adversely impacted by the proposed Project. This Treatment Plan has been 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 North Fork Valley Rural Historic District. This Treatment Plan also proposes mitigation measures designed to mitigate the adverse effects of the project.

Mountain Valley developed the direct and indirect Area of Potential Effect (APE) through consultation with the DHR. The indirect APE for historic architectural resources comprised, at a minimum, a 450-foot-wide corridor centered on the pipeline. In some areas, the APE was expanded up to one mile on either side of the pipeline in areas of higher elevation due to the possibility of distant views. The direct APE for the project was defined at the outset of the project as a 300-foot-

¹ As directed by DHR during an April 21, 2015, meeting between DHR and Mountain Valley's cultural resources consultant, Mountain Valley's architectural survey team did not re-inventory the previously recorded historic districts within the pipeline APE in Virginia.

wide corridor that would accommodate the actual construction right-of-way as well as workspace identified as project engineering and field surveys were completed.²

1.2 Project Effect

In accordance with Section 106 of the NHPA of 1966, as amended, Mountain Valley applied the Criteria of Adverse Effect to the North Fork Valley Rural Historic District by synthesizing the results of visual, construction-related and operation-related effects assessments.

As noted in Sections 3.2 and 4.1 of Mountain Valley's Criteria of Effects Report (May 2017), rural historic landscapes may also qualify as a Traditional Cultural Property (TCP), as defined in the National Park Service's *Guidelines for Evaluating and Documenting Traditional Cultural Properties*, if the landscape's "organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents" or if it serves as a location "where a community has traditionally carried out economic, artistic, or other cultural practices important in maintaining its historic identity." A rural historic district's eligibility for the NRHP as a TCP hinges on how the sites, structures, buildings, surrounding landscape, and landscape elements are used by members of the community. As such, Mountain Valley's assessment of effects to the North Fork Valley Rural Historic District's rural historic landscape involved an evaluation of direct and indirect (visual) effects to primary contributing resources within the historic district and also accounted for direct impacts on historic and current land uses, the results of which were presented in Section 4.1 of the Criteria of Effects Report.

This assessment resulted in a recommendation that changes in the rural historic landscape within the North Fork Valley Rural Historic District as a result of the proposed project would not occur to an extent that would diminish the district's integrity. For approximately 640 feet, the project parallels an existing high voltage power transmission corridor, present when the district was NRHP-listed in 1990, that bisects the district near its midpoint. As indicated through Mountain Valley's comparison of historic and recent land cover/use data, areas that were historically deciduous forest have been infiltrated by mixed and evergreen forest as a result of logging activities throughout the district. Mountain Valley noted substantial logging activities in the area of McDonalds Mill and along Paris Mountain that forms the southern boundary of the district.

Mountain Valley reasonably concluded that the existing high voltage power transmission corridor that bisected the district at the time of the district's nomination did not detract from the historic integrity of the district's landscape, because, as noted in the NRHP nomination, the boundaries of the district were drawn as to generally include all the farmland and woodland between the ridges which border the North Fork valley. Similarly, Mountain Valley concluded that changes in the landscape as a result of the project's permanent easement would not occur to an extent that will diminish the district's integrity. Despite the changes, there would still be a clear distinction between farmland and woodland and differing land uses. Cropland and pasture would be restored to cropland and pasture post-construction. The North Fork Valley Rural Historic District would

² In a May 20, 2015, letter, DHR concurred that the indirect APE was appropriately defined and accurately reflected previous consultation.

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. Furthermore, the project route would avoid any direct impacts on the district's contributing built environment (Attachment 1).

Photograph simulations depicting potential views from the North Fork Valley Rural District toward the project demonstrate that the potential changes in the district's viewshed and setting are "Inferior." In other words, the potential visual impact is visually inferior within the context of the existing setting and surrounding landscape. Although a part of the district will incur changes to its viewshed and setting as a result of the project, Mountain Valley recommended that these changes would not occur to an extent that would diminish the district's integrity.

Following careful study of the project and its relationship to the North Fork Valley Rural Historic District, and considering a full range of potential direct and indirect effects to the built environment and surrounding landscape, Mountain Valley recommended that the proposed project would have No Adverse Effect on the North Fork Valley Rural Historic District.

DHR found, in a letter dated July 7, 2017, that:

Based on the submitted analyses, DHR agrees with the consultant that the expected visual (indirect) impacts from Mountain Valley on the Newport Historic District, Greater Newport Rural Historic District, Big Stony Creek Historic District, Bent Mountain Rural Historic District, and Coles-Terry Rural Historic District do not significantly diminish those characteristics which make them eligible for listing in the NRHP...DHR believes that the indirect visual effects of the Project will significantly diminish and adversely affect the feeling and setting of the North Fork Valley Rural Historic District.

...the Greater Newport Rural Historic District, Big Stony Creek Historic District, North Fork Valley Rural Historic District, 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.

2.0 NORTH FORK VALLEY RURAL HISTORIC DISTRICT SETTING AND ASSOCIATION

The North Fork Valley Rural Historic District is a NRHP-listed historic district located near Blacksburg, Montgomery County, Virginia (Figure 1). The district encompasses 125 contributing buildings, 5 contributing sites, and 18 contributing structures. It consists of a significant rural landscape and an important collection of domestic and agricultural buildings, reflecting important agricultural practices in the region from 1745-1940. It includes domestic and agricultural buildings, a historic archaeological site, as well as an early-twentieth-century school, two late-

nineteenth-century churches, and five mid- to late-nineteenth-century industrial resources comprising three standing mills, a tanyard site, and a brick kiln site.

3.0 DESCRIPTION OF MOUNTAIN VALLEY AS IT AFFECTS PROPERTY SETTING AND ASSOCIATION

3.1 Effect from Permanent Fifty-Foot-Wide Imprint on the Landscape

Mountain Valley proposes to cross the North Fork Valley Rural Historic District at approximate milepost 224 of the project, for a distance of 11,406 feet, or 2.2 miles. Construction of the belowground pipeline will include short-term, long-term, and permanent impacts on the existing vegetation cover types.³ Effects related to vegetation removal within the rural historic landscape was among several issues that were the focus of consultation discussions with DHR and stakeholders. When feasible, project design plans have been modified in response to issues raised in public forums, project correspondence, and docket filings. Avoidance plans related to specific properties within the district are provided as Attachment 1. These plans were developed by Mountain Valley to avoid direct impacts on contributing historic properties. DHR accepted the avoidance plans in a letter dated July 7, 2017.

To the extent possible, the pipeline has been aligned parallel to existing utility rights-of-way and other linear features, and Mountain Valley will utilize existing access roads including private roads, drives, lanes, farm, or roads from previous construction to minimize clearing. Construction of the pipeline adjacent to existing rights-of-way will minimize impacts on vegetation by reducing trampling, compaction, land use change, tree clearing, and stump removal activities. The areas disturbed by construction will be restored to their original grades, condition and use or better, to the greatest extent practicable, in accordance with Project Specific Standards and Specifications approved by the Virginia Department of Environmental Quality (DEQ). Cleared vegetation will be restored using DEQ-approved native seed mixes, except in active agricultural lands that will be returned to their prior use.

Of the 11,406 feet of the project within the North Fork Valley Historic District, only a small segment in the valley is located in an area that is accessible or visible to the public, or visible from a primary contributing historic resource. That segment is a predominately open meadow or pasture land that will be restored to its previous condition following construction of the buried pipeline.

Vegetation removal for Mountain Valley has been minimized to the greatest practicable extent. However, as DHR concluded, project-related disturbances resulting from incompatible land use practices or resulting in the physical removal of vegetation within the rural historic landscape will affect the aspects of integrity of setting, feeling, and association for the North Fork Valley Rural Historic District and, as a result, requires treatment.

³ No aboveground ground facilities are proposed within the North Fork Valley Rural Historic District's NRHP boundary.

3.2 Indirect Visual Effects

In addition to the effects outlined in Section 3.1, the right-of-way will be visible from Catawba Road as it ascends a ridgeline to the south. Once the right-of-way is restored, travelers on this road will see an approximately 50-foot-wide opening in the tree line and linear stretch of meadow within the forested area on the side of the ridge. Simulations of this visual effect are included as Attachment 3. To minimize the visual impacts on existing vegetation cover types, the edges of the right-of-way will be feathered in selected areas visible from publically accessible roadways to reduce the contrast of the permanent, maintained right-of-way and ensure that vegetative openings appear more natural and in conformance with the natural form, line, color, and texture of the existing landscape.

DHR also identified an access road (MVP-MN-268) as a “new and prominent feature on the historic landscape visible by those traveling the primary roadway.” However, it should be noted that this access road is an *existing* gravel and dirt road. Following project construction, this road will be restored to its preexisting condition. It will be maintained under a permanent easement only for periodic access to the project corridor by pickup truck for inspection and maintenance.

These visual effects related to the physical vegetation removal within the rural historic landscape and the access road will, according to DHR, also affect the aspects of integrity of setting, feeling, and association for the North Fork Valley Rural Historic District and, as a result, requires treatment.

4.0 MITIGATION OF ADVERSE EFFECTS IDENTIFIED

4.1 Approach to Development of Mitigation

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 adverse effects to be mitigated for the North Fork Valley Historic District are, according to DHR, the diminution in the “very agrarian setting and feeling” of the district resulting from the “permanent fifty-foot wide imprint on [its] landscape” and the visual effect of a portion of the right-of-way that is visible from Catawba Road as it descends a ridgeline and improvements to an existing access road at the same location.

To further clarify this effect and assess its magnitude, it is important to note that within the pasture and meadow portions of the route through the district, the aboveground impacts from this buried natural gas pipeline will be largely imperceptible to observers following the restoration of the right-of-way. Permanent impacts on the portions of the landscape not devoted to agriculture 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 the portions of the landscape not devoted to agriculture, and not in forest, 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 North Fork Rural Historic District, this results in approximately 3,336 feet (or 29 percent) of impacts that will either be avoided or restored. In light of the largely temporary impacts on the physical landscape in non-forested areas and the measures to minimize the visibility of the right-of-way in forested areas, additional changes to project construction or restoration practices will not effectively ameliorate the adverse effect identified by DHR on the agrarian feeling and setting of the district.

Mountain Valley has identified a mitigation measure—development of a historic driving tour narrative of the district with associated visual materials—that will directly address the potential adverse effects identified by DHR to the “feeling” of the area for its residents and visitors and to the identified visual impact on the ridgeline by educating residents and visitors about the historic and cultural significance of the district. This approach is proportional to the minimal long-term physical adverse effect to the agrarian portions of the district. It also is responsive to the desire expressed by stakeholders to foster tourism in the area by highlighting its historic and cultural significance.

4.2 Consultation with Consulting Parties and Other Stakeholders

The DHR recommended that the Mountain Valley assist the FERC with outreach to consulting parties and other stakeholders to identify appropriate mitigation measures for the adverse impacts on the North Fork Valley Rural Historic District. As there is no steering committee for the district, Mountain Valley contacted Gibson Worsham, an architect who prepared the NRHP nomination for the district. In a July 17, 2017, email, Mr. Worsham suggested Mountain Valley contact Elizabeth Hahn, an engaged landowner within the district. Ms. Hahn responded to Mountain Valley by email dated July 26, 2017, indicating that she had communicated with landowners within the district and that all had declined to meet with Mountain Valley to discuss potential mitigation strategies. Anita Puckett, a representative from Preserve Montgomery, confirmed this stance in an August 1, 2017, email. Attachment 2 contains copies of telephone records and emails documenting MVP’s efforts.

4.3 Proposed Mitigation Plan

The proposed mitigation plan is to fund development of an approximately one-hour driving tour narrative for the North Fork Valley Rural Historic District; create a tri-fold brochure that will include a map locating each historic property featured on the tour; and establish way-finding signage that will align with the numbered sites on the brochure map and in the narrative. The driving tour narrative on compact disk will also be available by podcast and/or online streaming, will emphasize one major theme, the district’s association with agricultural development of the region, and one subtheme, the district’s architectural history. In order to mitigate both the adverse direct effects that would result from the “permanent fifty-foot-wide imprint on the landscape” and the indirect visual effects that would result from permanent impacts on vegetation cover types, the tour’s narrative and accompanying brochure will also identify types of natural and built historic landscape features and will focus on historic land use within the district.

One hundred compact disks containing the driving tour narrative will be distributed to the Montgomery County Tourism Development Council, the Montgomery County Chamber of Commerce, and Preserve Montgomery to be, at their election, made available to the public or sold at a price to be determined by each entity and the profits from which would be retained by those organizations. A digital copy of the historic driving tour brochure will also be provided to be used at each organization's discretion (i.e. large format printing, web-publishing, compact disks). In addition, 1,000 hard copies of the tour brochure will be distributed among the organizations. Way-finding signage corresponding with the numbered sites on the brochure map and in the narrative will be established at ten locations along publically accessible rights-of-way, to be determined in consultation with DHR and stakeholders and dependent upon landowner permission. If landowners do not consent to signage placement, locations will be limited to areas where the permanent Mountain Valley easement intersects public road rights-of-way. The narrative and the brochure will integrate historic writings, memoirs, recollections, and photographs provided by stakeholders into the tour's narrative.

As there is no committee or point of contact specific to the North Fork Valley Rural Historic District, Mountain Valley will afford Preserve Montgomery, Preservation Virginia, and the Committee for Appalachian and Piedmont Preservation the opportunity to, individually or collectively, choose the qualified professional, administer the funds, and manage the qualified professional (meeting the *Secretary of the Interior's Professional Qualification Standards*) and deliverables. If an outside organization manages the implementation of the mitigation plan, it will adhere to all requirements of this document. If these organizations decline to serve in this capacity, Mountain Valley will assume these responsibilities.

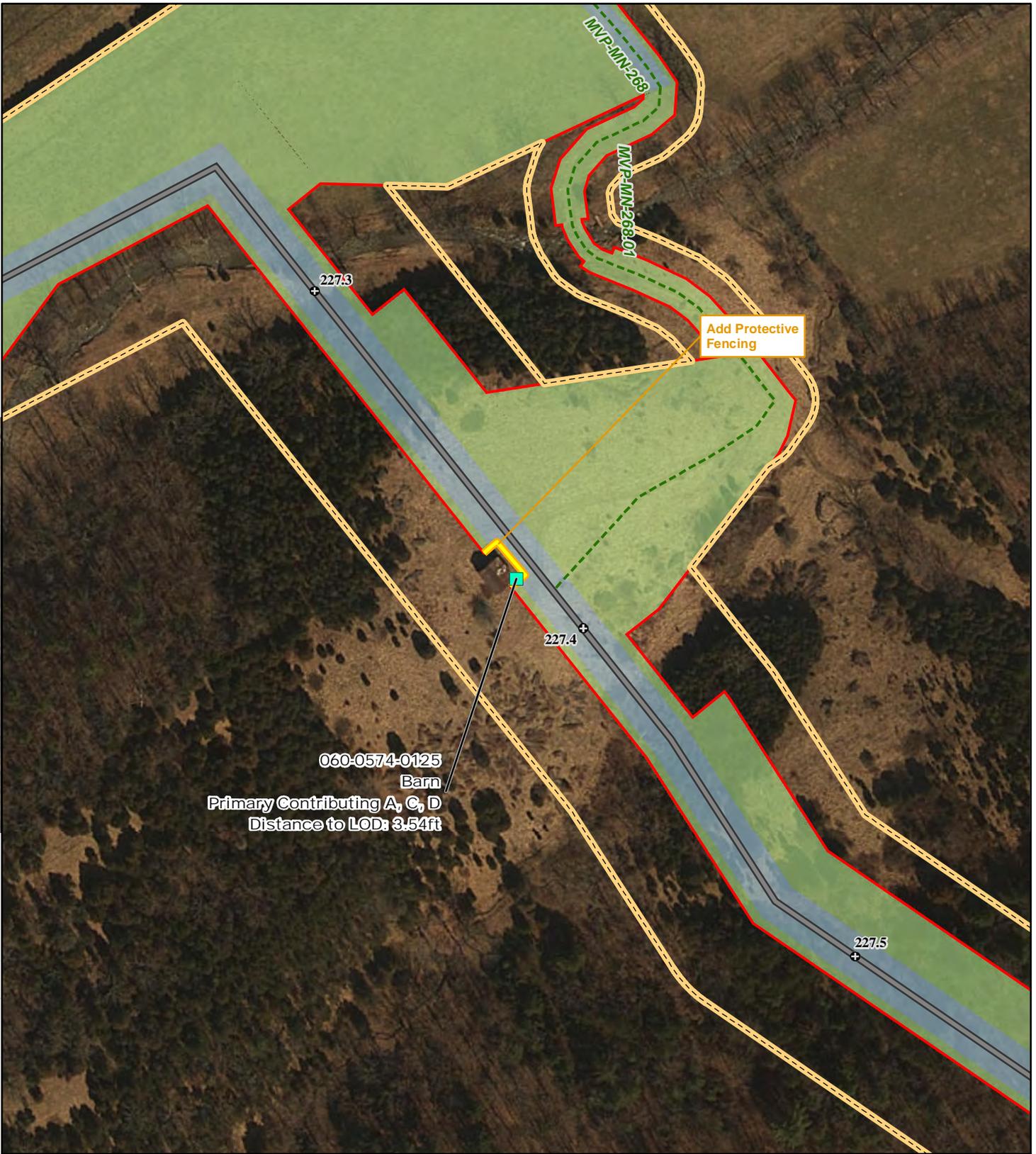
Mountain Valley will work with the DHR and interested stakeholders to finalize the scope of this Treatment Plan.

5.0 SCHEDULE

Within two months of issuance of the FERC Certificate for the project, Mountain Valley will develop and submit a final scope of work and cost estimate for the development of the historic driving tour and associated materials to the DHR for review and approval. The final scope of work and funding will be implemented accordingly (as outlined in Section 4.3 above) and all activities related to the Treatment Plan will be completed within two years of the date of the Certificate.

ATTACHMENT 1
AVOIDANCE PLANS

Document Path: P:\EOT-Equitrans\MVP-Project\GIS\Status\MXD\02_Cultural\20170815_VA_COE_Avoidance_Plans_Direct_APE\VA_COE_AvoidancePlans_20170815.mxd



060-0574-0125
Barn
 Primary Contributing A, C, D
 Distance to LOD: 3.54ft

Add Protective Fencing

Mountain Valley Pipeline Project			NAD 1983 UTM 17N	
<p>Avoidance Plan Site: 060-0574-0125 Barn Montgomery County, Virginia</p> <p>August 2017</p>	Legend			
		Avoided Historical Architectural Resource		
		Protective Fencing		Proposed Route
		Access Road		Direct APE
		Proposed Limits of Disturbance		Permanent Limit of Disturbance
		Temporary Limit of Disturbance		
Data Sources: USGS, ESRI, Open Street Map, VDHR.				

ATTACHMENT 2
CORRESPONDENCE

From: Gibson Worsham
To: [Neylon, Megan](mailto:Neylon.Megan)
Subject: Fwd: Mountain Valley Pipeline
Date: Monday, July 17, 2017 4:53:00 PM

Here you are-

----- Forwarded message -----

From: **Betty Hahn** <foxonabridge@gmail.com>
Date: Mon, Jul 17, 2017 at 4:46 PM
Subject: Re: Mountain Valley Pipeline
To: Gibson Worsham <gibson.worsham@gmail.com>

Hi Gibson,

I am in Europe until July 24 but would definitely like to discuss the pipeline. Do you know when they wanted to talk. I can also come up with a list of people down the valley. It is rather late here now but in the morning I will try to put together a list. Thanks for asking. Just getting started on renovations. The old house is getting an exterior paint job while we are away.

Cheers,
Betty

Sent from my iPad

On Jul 17, 2017, at 3:39 PM, Gibson Worsham <gibson.worsham@gmail.com> wrote:

Dear Betty-

This consultant for the Mountain Valley pipeline contacted me to give them names for people from the North Fork Rural Historic District who might like to attend a meeting to discuss the pipeline. If you have any names, would you please get in touch with her at the attached email address? Or if you don't mind, I can give her your email address.

I hope things are going well at the Plank Farm.

Thanks,

Gibson

----- Forwarded message -----

From: **Neylon, Megan** <MNeylon@eqt.com>
Date: Mon, Jul 17, 2017 at 3:06 PM
Subject: Mountain Valley Pipeline
To: "gibson.worsham@gmail.com" <gibson.worsham@gmail.com>

Gibson,

Thank you again for taking the time to talk with me this afternoon, I have attached a map that shows the location in which Mountain Valley proposes to cross the North Fork Valley Rural Historic District.

Per our discussion, Mountain Valley is trying to reach out to a primary contact within the North Fork Rural Historic District to set a meeting to discuss impacts of the Mountain Valley Pipeline Project on the Historic District and potential mitigation options.

Any contact information that you could provide for Elizabeth Hahn and others within the District would be greatly appreciated.

Thank you,

Megan E. Neylon

Supervisor - Permitting

Office: [724-873-3645](tel:724-873-3645)

555 Southpointe Boulevard

Suite 200

Canonsburg, PA 15317

MNeylon@eqt.com

<MVP_Rev5_1_27_Crossing_NorthFolk_HD.PDF>

From: Betty Hahn
To: [Evelyn Tidlow](mailto:Evelyn.Tidlow)
Cc: [Neylon, Megan](mailto:Neylon.Megan)
Subject: Re: Mountain Valley Pipeline - North Fork Rural Historic District Meeting
Date: Wednesday, July 26, 2017 2:19:30 PM

Hello Evelyn

I have heard back again from folks here about a possible meeting and contrary to what I said in my last email, people have changed their minds and no one wants to have a meeting. This is because no one believes the pipeline IS in fact something that can be mitigated at all, and as you are already working for the pipeline company, no one believes there is any point to such a meeting. I have to admit that I agree and have felt this way all along but just thought maybe some folks would like to meet to express this. As it turns out, no one does. This pipeline is completely egregious to our whole way of life around here. I am sorry but that is the way we are all feeling. So I am dropping any attempts to make any effort toward a meeting on your behalf.

Elizabeth Hahn

> On Jul 24, 2017, at 4:04 PM, Evelyn Tidlow <E.Tidlow@gaiconsultants.com> wrote:

>

> Ms Hahn -

>

> Hope you've had a wonderful trip and are having an easy trip home.

>

> Gibson suggested that we reach out to Kathleen Grubb as one of the folks who may be interested in attending a meeting regarding the district. I wanted to check in with you before we contact her to make sure that we aren't duplicating efforts. Please let me know if you think we should contact her or if this is someone you will be in contact with. Again, please don't hesitate to let me know if there's anything I can do to help with this effort.

>

> Thanks again for your assistance.

>

> Best,

> Evelyn

>

> -----Original Message-----

> From: Betty Hahn [<mailto:foxonabridge@gmail.com>]

> Sent: Wednesday, July 19, 2017 1:11 PM

> To: Evelyn Tidlow <E.Tidlow@gaiconsultants.com>

> Subject: Re: Mountain Valley Pipeline - North Fork Rural Historic District Meeting

>

> Hello Ms. Tidlow

>

> I have received your email, but as I told Gibson Worsham, I am in Europe until very late on July 24. I do know people in the valley who I believe would be interested in talking to you. My problem is that I do not have all their contact information with me, which may make a meeting right after I return rather difficult. I will attempt to find ways to contact folks but am not sure at this point. I will email again soon regarding what I find out.

>

> Elizabeth Hahn

>

> Sent from my iPad

>

>> On Jul 18, 2017, at 3:19 PM, Evelyn Tidlow <E.Tidlow@gaiconsultants.com> wrote:

>>

>> Ms. Hahn -

>>

>> I'm writing on behalf of Mountain Valley Pipeline (MVP) per your emails with Mr. Gibson Worsham yesterday.

I am a consultant to MVP assisting the project team with Section 106 compliance activities. We are trying to reach out to a primary contact for the North Fork Rural Historic District to set a meeting to discuss potential impacts of the Mountain Valley Pipeline Project on the North Fork Rural Historic District and possible mitigation options should the project receive its FERC certificate.

>>

>> We hope to set up a meeting with you and other interested parties the week of July 24th if at all possible. Please let us know if a day the week of the 24th is an option or if another day the following week is better for you. Please let me know if I can provide any help in arranging this meeting or if you have any questions. I can be reached at this email address or at the phone number below.

>>

>> Thank you for your attention to this matter. We look forward to talking with you soon.

>>

>> Evelyn M. Tidlow

>> Assistant Director

>> GAI Consulting

>> 612-812-5478

>>

>>

From: Anita Puckett
To: [Neylon, Megan](mailto:MNeylon@eqt.com)
Subject: Re: North Fork Valley Rural Historic District
Date: Tuesday, August 01, 2017 5:16:45 PM

Sorry, Megan. Our stance is one that no mitigation is possible. MVP needs to move outside the entire District. There's no point in meeting.

Anita

On Tue, Aug 1, 2017 at 11:16 AM, Neylon, Megan <MNeylon@eqt.com> wrote:

Anita,

Elizabeth (Betty) Hahn sent an email to Mountain Valley on July 26, 2017 stating that she has spoken to people interested in the North Fork Valley Rural Historic District and that they decline a meeting with Mountain Valley. Based on your email below, I wanted to reach out to you to see if you would still like to meet. If you would still be interested in meeting with Mountain Valley, I would like to set up a date and time. Please feel free to give me a call to discuss.

Thank you,

Megan E. Neylon

Supervisor - Permitting

Office: [724-873-3645](tel:724-873-3645)

MNeylon@eqt.com

From: Anita Puckett [mailto:anitampuckett@gmail.com]

Sent: Tuesday, July 25, 2017 10:00 AM

To: Neylon, Megan <MNeylon@eqt.com>; Sheriff, David <fires1957@yahoo.com>; Ann M Rogers <amelvin3@verizon.net>

Subject: North Fork Valley Rural Historic District

Dear Ms. Neylon,

A short message to let you know that I'm a representative of Preserve Montgomery who is

working on developing a Section 106 based response to MVP's proposed crossing of the North Fork Valley Rural Historic District.

Mr. Brady and Ms. Rogers and I have been collaborating as well. Perhaps I can talk or meet with you in Pearisburg, should they find my attending to be relevant to their needs?

Sincerely,

Anita Puckett

Preserve Montgomery County, Virginia

ATTACHMENT 3
PHOTO SIMULATIONS

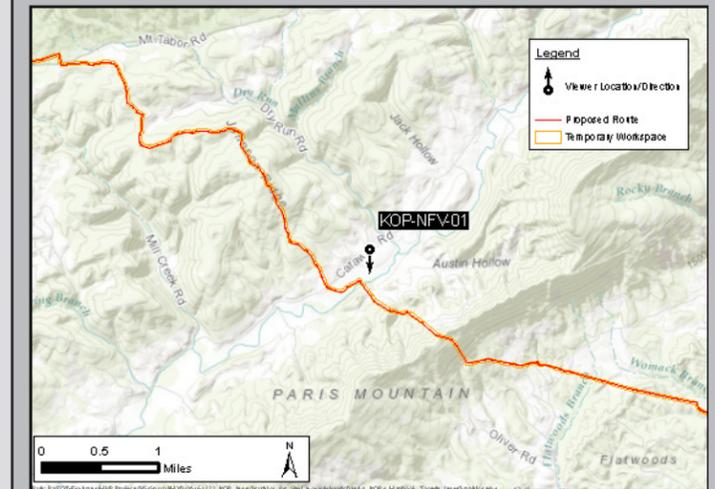


Existing Condition



Post Construction (Leaf-off Condition) - The 50-foot-wide permanent pipeline right-of-way is located approximately 0.5 mile south of this viewpoint at its closest point. The red arrows indicate where the pipeline right-of-way and access drive would be visible crossing over Paris Mountain.

Rating for KOP NFV-01 Photo Simulation: Inferior



North Fork Valley Rural Historic District Key Observation Point NFV-01

Photograph Information

Time of photograph: 10:56 AM

Date of photograph: 11.30.2016

Weather condition: Overcast

Viewing direction: South

Latitude: 37°16'21.79"N

Longitude: 80°18'47.03"W

Photo Location: The photo was taken from along Catawba Road/Route 785, and approximately 6 miles northeast of the Town of Blacksburg, Virginia.

Mountain Valley Pipeline Project

North Fork Valley Rural
Historic District

Montgomery County, Virginia

