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August 25, 2017

Mr. David Brady  
Section 106 Coordinator, Greater Newport Rural Historic District Committee  
190 Cider Hill Road  
P.O. Box 70 Newport, VA

**Subject: Mountain Valley Pipeline Project  
Historic Property Treatment Plan for the Greater Newport Rural Historic  
District (035-0412)  
FERC DOCKET NO. CP16-10, DHR FILE #2014 1194**

Dear Mr. Brady,

On behalf of Mountain Valley Pipeline, LLC (Mountain Valley), a joint venture between affiliates of EQT Midstream Partners, LP and NextEra Energy, Inc., Con Edison Midstream Gas, LLC, WGL Holdings, Inc., and RGC Midstream LLC, you will find enclosed for your comment *Mountain Valley Pipeline Project, Historic Property Treatment Plan: Greater Newport Rural Historic District (035-0412)* dated August 2017.

Following submittal of the *Mountain Valley Pipeline Project, Criteria of Effects Report for Virginia* (May 2017), Virginia Department of Historic Resources (DHR) issued its opinion in a letter dated July 7, 2017, that the proposed Mountain Valley Pipeline Project will adversely affect the National Register of Historic Places (NRHP)-listed Greater Newport Rural Historic District. The Federal Energy Regulatory Commission is consulting with the DHR on the treatment of historic properties that will be adversely impacted by the proposed project. The enclosed Treatment Plan has been developed to document Mountain Valley's efforts to date 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 these effects.

Mountain Valley looks forward to receiving your comments on the enclosed Treatment Plan including any other strategies you might recommend for mitigating the project's adverse effects to the aforementioned district by Monday, September 11, 2017. You may contact me by telephone at (724) 873-3645 or by e-mail at [mneylon@eqt.com](mailto:mneylon@eqt.com) if you have questions.

Thank you for your attention.

Sincerely,

A handwritten signature in blue ink that reads "Megan E. Neylon". The signature is written in a cursive, flowing style.

Megan Neylon  
Environmental Permitting Supervisor

August 25, 2017  
Page 2

Enclosures:

Historic Property Treatment Plan: Greater Newport Rural Historic District (035-0412)

cc: Matthew Fellerhoff, Strauss Troy Co., LPA  
Joseph Yost, Giles County Historical Society  
Chris McClarney, Giles County Board of Supervisors  
Sonja Ingram, Preservation Virginia  
Ann Rogers, Committee for Appalachian and Piedmont Preservation  
Francis Collins  
Jerry and Jerolyn Deplazes  
Clarence and Karolyn Givens  
Shannon Lucas  
Roger Kirchen, VDHR

**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, 3<sup>rd</sup> 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).<sup>1</sup> 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-

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<sup>1</sup> 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.<sup>2</sup>

## 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

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<sup>2</sup> 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.

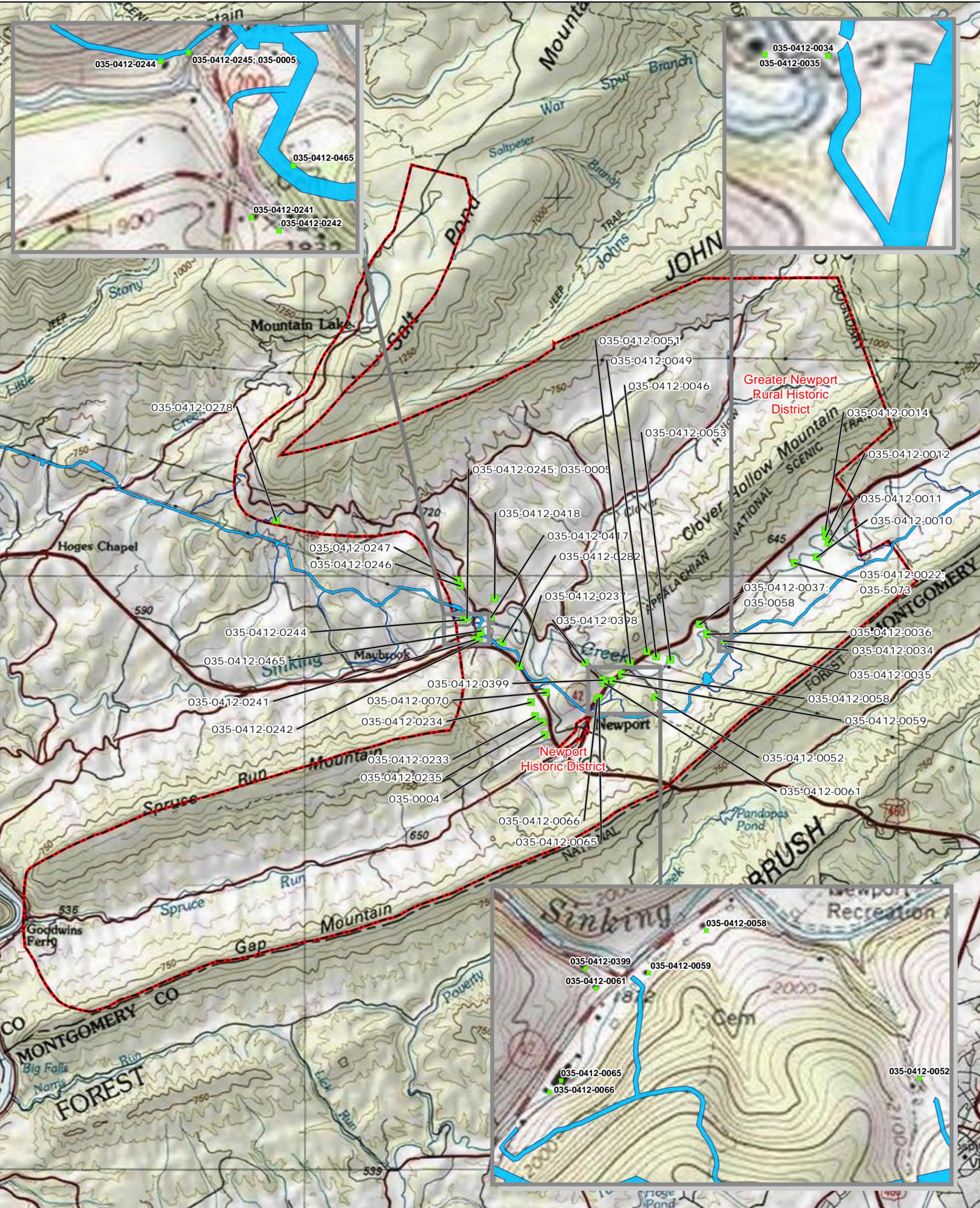
DHR found, in a letter dated July 7, 2017, that:

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.

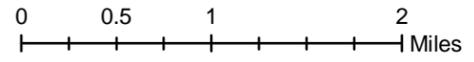
## **2.0 GREATER NEWPORT RURAL HISTORIC DISTRICT SETTING AND ASSOCIATION**

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



**Proposed Route within the Greater Newport Rural Historic District**

**Figure 1**

**August 2017**

**Legend**

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



Data Sources: ESRI 2017, USGS 2017.

Document Path: P:\EQ1-Equitrans\MWP\Project\GIS\Spatial\MXD\02\_Cultural\20170816\_VA\_COE\_Treatment\_Plan\_PD\_Boundaries\_MasterListResources\_GNRHD\_topo.mxd

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.

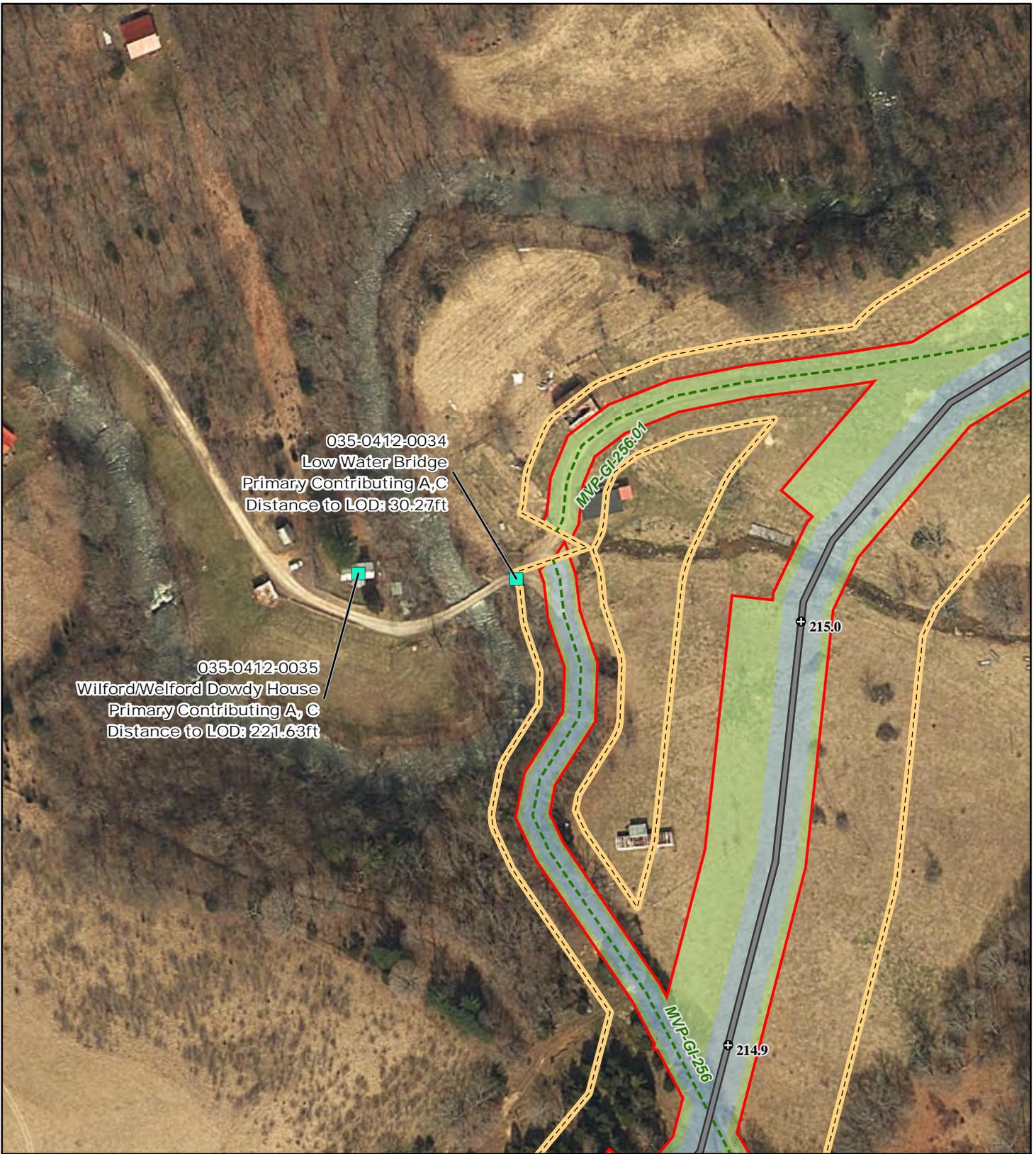
Mountain Valley will work with the DHR and interested stakeholders to finalize the scope of this Treatment Plan.

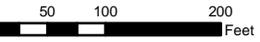
## **5.0 SCHEDULE**

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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<b>Mountain Valley Pipeline Project</b>	 NAD 1983 UTM 17N	
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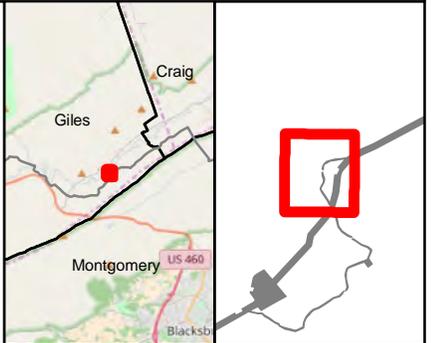


**Avoidance Plan**  
**Site: 035-0412-0034**  
**Low Water Bridge**  
**Giles County, Virginia**

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      0 50 100 200 Feet

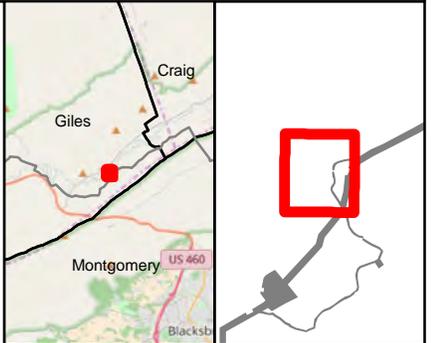
**Mountain Valley PIPELINE**

**Avoidance Plan**  
**Site: 035-0412-0035**  
**Wilford/Welford Dowdy House**  
**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.

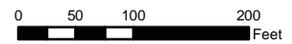
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**Mountain Valley Pipeline Project**



NAD 1983 UTM 17N



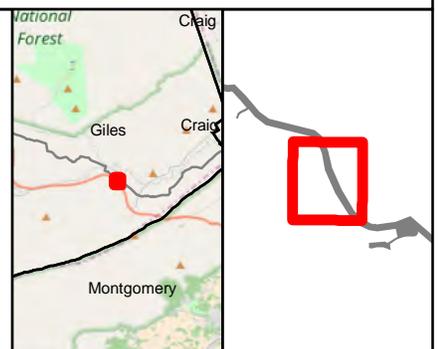
**Avoidance Plan**  
**Site: 035-0412-0237**  
**Fidel Smith Store**  
**Giles County, Virginia**

August 2017

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

**Legend**

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



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**Mountain Valley Pipeline Project**



NAD 1983 UTM 17N



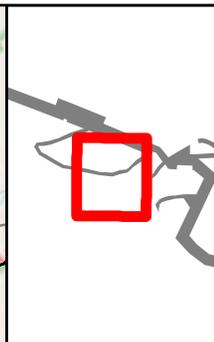
**Avoidance Plan**  
Site: 035-0412-0245; 035-0005  
1912 Sinking Creek Covered Bridge,  
Link Farm  
Giles County, Virginia

August 2017

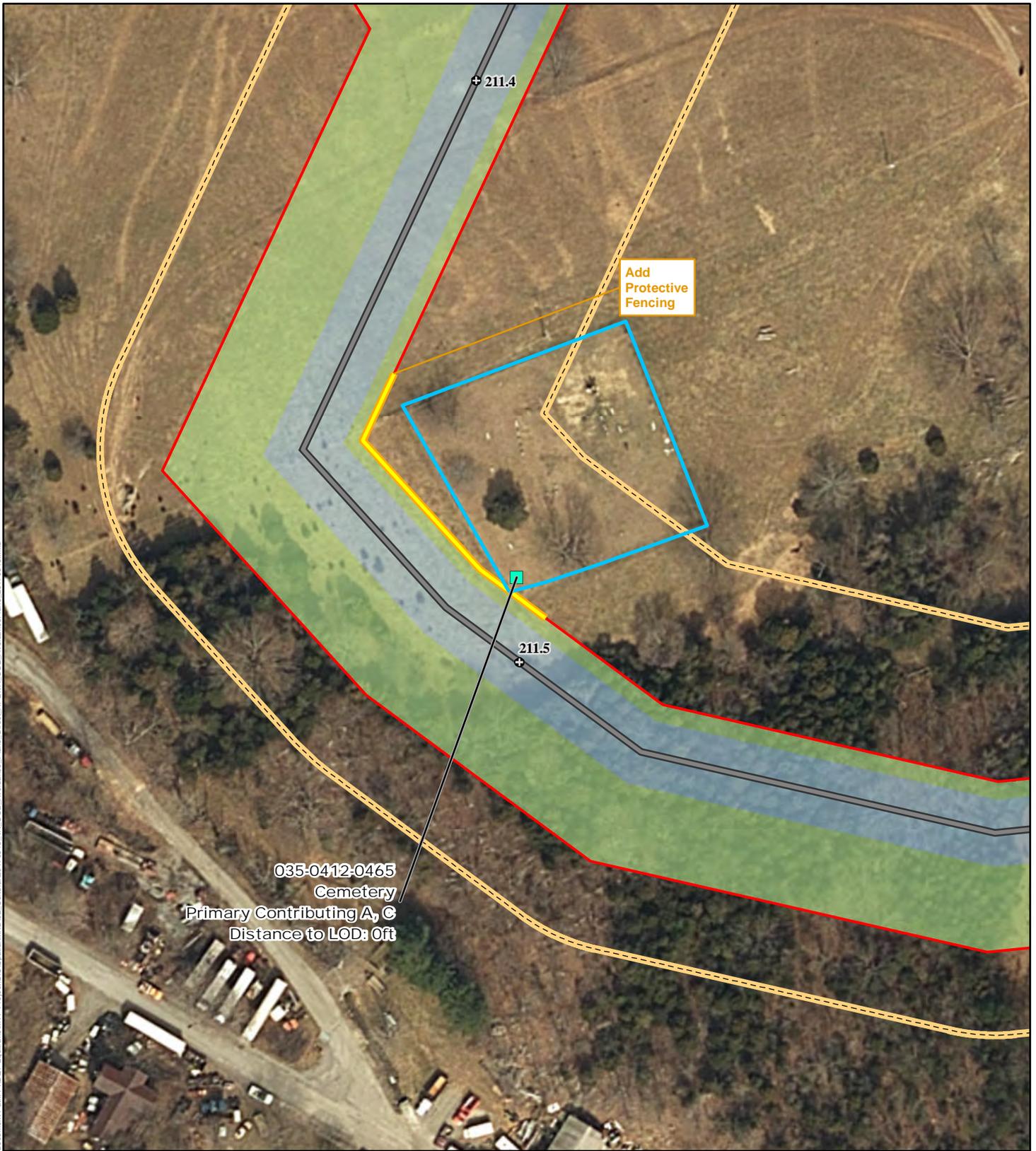
Data Sources: USGS, ESRI, Open Street Map, VDHR.

**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



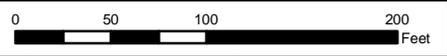
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**Mountain Valley Pipeline Project**



NAD 1983 UTM 17N

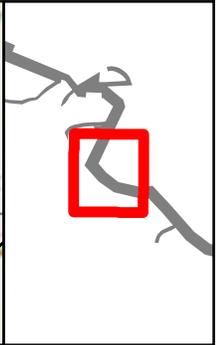



**Avoidance Plan**  
**Site: 035-0412-0465**  
**Cemetery**  
**Giles County, Virginia**

August 2017

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

- 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

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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

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**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](mailto: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 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

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**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 15<sup>th</sup> 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

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**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



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