



September 15, 2017

Ms. Susan Pierce
Deputy State Historic Preservation Officer
West Virginia Division of Cultural & History
1900 Kanawha Blvd, East
Charleston, WV 25305-0300

**Subject: Mountain Valley Pipeline Project
Historic Property Treatment Plans for Three Historic Properties
Request for Review Under Section 106 of the National Historic Preservation Act
WVDCH FR # 15-67-MULTI
FERC Docket CP16-10**

Dear Ms. Pierce,

On behalf of Mountain Valley Pipeline, LLC (Mountain Valley), a joint venture between affiliates of EQT Midstream Partners, LP and affiliates of NextEra Energy, Inc., Con Edison Midstream Gas, LLC, WGL Holdings, Inc., and RGC Midstream LLC, you will find enclosed 1 CD and 1 paper copy of the following documents entitled:

1. *Mountain Valley Pipeline Project, Historic Property Treatment Plan: Losch Farmstead (BX-0351)*
2. *Mountain Valley Pipeline Project, Historic Property Treatment Plan: St. Bernard's Church and Cemetery (NR#85001583)*
3. *Mountain Valley Pipeline Project, Historic Property Treatment Plan: Underwood Farmstead (LE-0150)*

In *Mountain Valley Pipeline Project, Criteria of Effects Report, Wetzel, Harrison, Doddridge, Lewis, Braxton, Webster, Nicholas, Greenbrier, Fayette, Summers, and Monroe Counties, West Virginia* (February 2017) and in supplemental information provided to your office June 30, 2017, regarding Mountain Valley's Criteria of Effects assessment, it was recommended that no historic properties in West Virginia would be adversely affected by the proposed project. In a letter dated August 3, 2017, your office found that four historic properties—Haight House/New Dale Farm (HS-0610), Underwood Farmstead (LE-0150), St. Bernard's Church and Cemetery (NR 85001583), and Losch Farmstead (BX-0351)—would be adversely affected by the project. In WVDCH's opinion, tree clearance and permanent right-of-way areas would permanently alter the resources' settings, resulting in adverse effects.

Subsequently, in a letter dated August 23, 2017, your office rescinded its previous finding of adverse effect to the Haight House/New Dale Farm. The letter indicated that, based on a revised Historic Property Inventory Form (including recent photographs) provided to your office August 16, 2017, the resource is no longer eligible for the National Register of Historic Places. WVDCH also stated that no additional consultation regarding this resource is necessary.

As requested by your office in the August 3, 2017, comment letter, Mountain Valley evaluated alternatives for the undertaking to avoid or minimize the adverse effects due to permanent tree clearance on the Underwood Farmstead (LE-0150), St. Bernard's Church and Cemetery (NR 85001583), and Losch Farmstead (BX-0351). Vegetation removal for the project has been minimized to the greatest practicable extent. Mountain Valley believes that additional changes to project construction or restoration practices will not effectively ameliorate the source of the adverse effect identified by your office—permanent tree

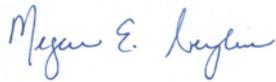
clearance—on the setting of these three resources. As such, Mountain Valley worked with stakeholders to identify potential mitigation measures in order to develop treatment plans for the three historic properties. A summary of that consultation is included in the attached treatment plans.

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



Megan E. Neylon
Senior Environmental Coordinator

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

cc: Matt Hoover, EQT Corporation (without attachments)
John Centafonti, EQT Corporation (without attachments)
Sean Sparks, Tetra Tech (without attachments)
James Marine, Tetra Tech (without attachments)

MOUNTAIN VALLEY PIPELINE PROJECT
HISTORIC PROPERTY TREATMENT PLAN
Losch Farmstead (BX-0351)

DOCKET NO. CP16-10
WVDCH FILE #15-67-MULTI

Prepared for



555 Southpointe Boulevard
Canonsburg, Pennsylvania 15317

Prepared by



661 Andersen Drive
Foster Plaza
Pittsburgh, PA 15220

September 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 West Virginia Division of Culture and History-Historic Preservation Unit (WVDCH), 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, WVDCH issued its opinion in a letter dated August 3, 2017, that the proposed project will adversely affect the Losch Farmstead (BX-0351), a historic resource determined eligible for the National Register of Historic Places (NRHP). The FERC is consulting with the WVDCH 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 Losch Farmstead. 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 WVDCH. The APE for direct effects for the MVP Project comprised a 91.46-meter (300-foot) corridor centered on the proposed pipeline or 45.7 meters (150 feet) on either side of the pipe centerline. The direct APE also includes the limits of ground disturbance for any ancillary facilities necessary to construct, operate, and maintain the pipeline. Ancillary facilities include compressor stations, access roads, construction staging areas, and temporary workspaces. For access roads, the direct APE was defined as a 30.5-meter (100-foot) corridor centered on the proposed access road or 15.2 meters (50 feet) on either side of the proposed road centerline. The APE for indirect effects accounted for the visual impacts of the Project, not only for aboveground Project facilities such as compressor stations, but also for the 15.2-meter (50-foot) corridor

(permanent right-of-way) that will remain after construction to service and maintain the pipeline. The indirect APE was defined as 0.4 kilometers (0.25 miles) on either side of the proposed pipe centerline and a 0.8-kilometer (0.5-mile) radius around the limits of ground disturbance for each compressor station.

Mountain Valley's cultural resources consultants identified the Losch Farmstead (BX-0351) in Braxton County during the Phase I historic architecture survey conducted in August 2016.

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 Losch Farmstead.

As noted in Section 4.2 of Mountain Valley's *Criteria of Effects Report* (February 2017), the project will include a permanent access road and permanent easement within the historic property boundary. These plans include the use of an existing access road, which currently dissects the farmstead, adjusted slightly to maintain a minimum distance of 15 feet from all buildings and structures to avoid any impacts on these resources. The access road will be extended to the east through the historic property boundary in an area that, according to historic aerial photographs, formerly served as a tractor path or farm road. These plans also include the construction of the pipeline, in a north-south direction, through the eastern portion of the Losch Farmstead historic property boundary. Mountain Valley acknowledged that construction activity will result in changes to the resource's landscape; however, it was recommended that this will not change aspects of the property's integrity that contribute to its significance. Mountain Valley noted that a review of historic aerial photography indicates that while the surrounding land is historically tied to the farmstead, the landscape lacks integrity and no longer contributes to the historic significance of the resource. Due to new-growth trees and vegetation that currently predominates the landscape, Mountain Valley recommended that the farm no longer maintains its historic agricultural landscape features (i.e. pasture land, crop fields, field divisions, wind breaks, tractor paths, etc.) that are evident in historic aerial photography. The farmstead conveys its significance through its intact assemblage of historic agricultural and domestic buildings, direct impacts on which will be avoided by the project, and does not derive its significance from the surrounding landscape. Furthermore, photograph simulations depicting views from the Losch Farmstead towards the project indicate that visual impacts will be inferior (Attachment 1). Following careful study of the project and its relationship to the historic property, Mountain Valley recommended that the proposed undertaking would have no effect on the Losch Farmstead.

WVDCH found, in a letter dated August 3, 2017, that:

Based on the submitted effects report, the pipeline and necessary access roads will cross the immediate property. Thus, planned tree clearance and permanent right-of-way areas will permanently alter the farmstead's setting. Though indirect effects on the property's main buildings will be minimal, it is our opinion the proposed work will adversely affect the Losch Farmstead... We request you evaluate alternatives for the undertaking to avoid or minimize those effects and then inform us of such.

2.0 LOSCH FARMSTEAD SETTING AND ASSOCIATION

During Phase I survey, Mountain Valley's cultural resources consultant recommended the Losch Farmstead as eligible under both Criterion A and Criterion C.

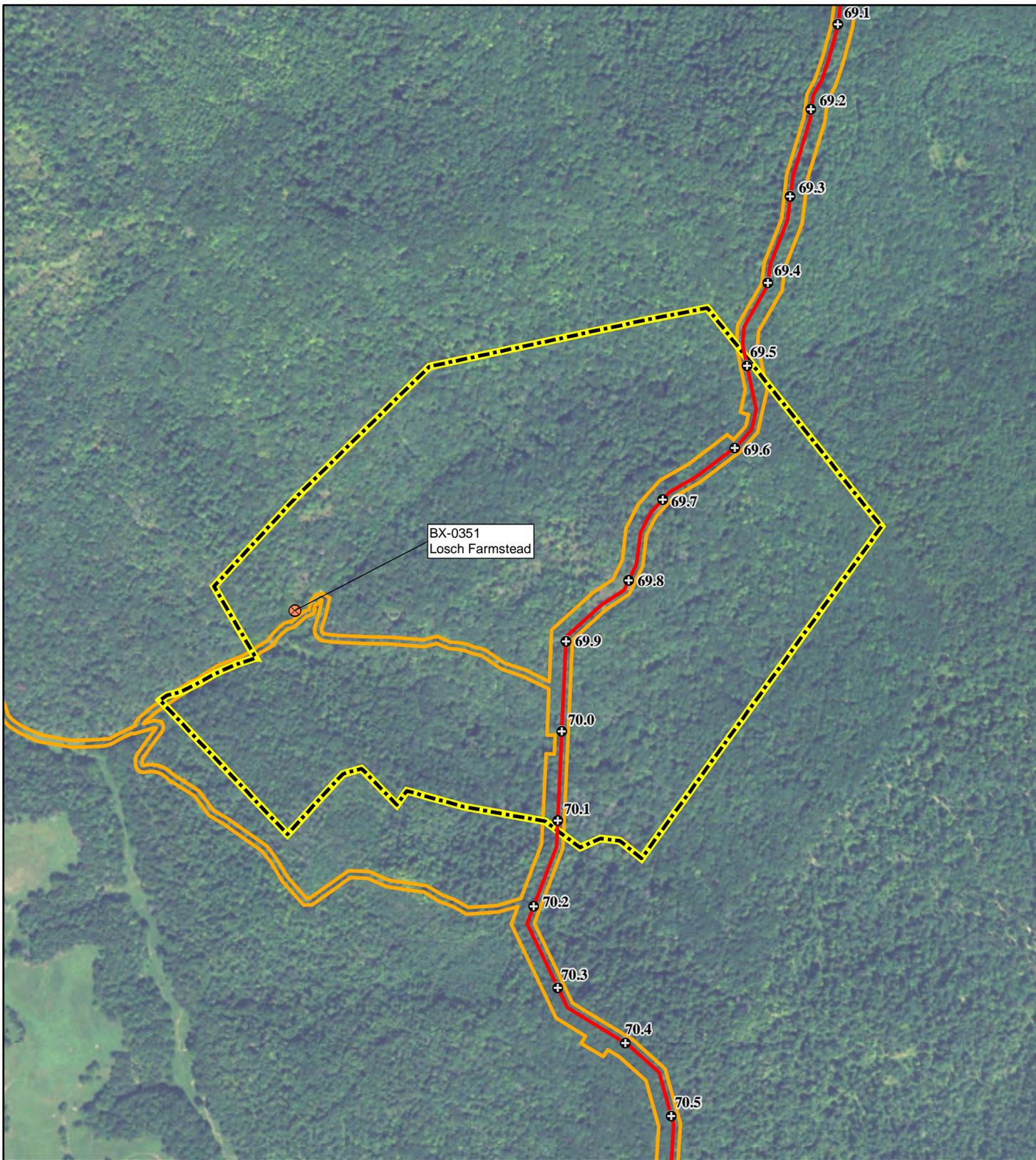
The extant resources currently contained within the Losch Farmstead likely reflect only a portion of those that comprised the farmstead at the turn-of-the-century. However, the extant farmhouse and associated outbuildings do convey their original function and purpose and demonstrate the spatial planning of small, early-twentieth century farms in Braxton County. Therefore, it was recommended that this resource is eligible for NRHP listing under Criterion A. Coupled with the collection of relatively well-preserved and unaltered outbuildings, the deteriorated farmhouse provides architectural context for this early-twentieth century Braxton County farm. As a result, this farmstead was recommended eligible for NRHP listing under Criterion C. The proposed period of significance spans the construction dates of the farmhouse and outbuildings, circa-1890 to circa-1960. The proposed NRHP boundary for this farmstead is the current tax parcel boundary, which encompasses the surrounding land that was historically associated with the resource. The WVDCH concurred with this eligibility recommendation and boundary definition in a letters dated December 8, 2016, and August 3, 2017. The boundary is depicted in Figure 2-1.

The unoccupied Losch Farmstead is sited in a hollow at the eastern terminus of County Road (CR) 4/4 (Little Knawl Creek Road), approximately 0.5 mile west of the road's intersection with CR 19/12 Millstone Run Road in the vicinity of Napier. The farmstead comprises a circa-1890 farmhouse and five outbuildings: a circa-1890 root cellar, a circa-1910 pigsty, a circa-1890 barn, a circa-1960 privy, and a circa-1935 corn crib. The Losch farmhouse is a two-story, five-bay farmhouse constructed in the I-house form and stands on a stone pier foundation (Photo 2-1). The exterior walls of the building are clad in wood lap siding. The house's side gable roof is covered in standing seam metal; fenestration consists of 2/2 double hung, wood sash windows. The window and door configurations on the lower and upper stories suggest that a two-story, open-air porch originally extended the full-length of the facade, but is no longer intact. Two five-panel wood entry doors are accented by transoms (glass no longer intact). A single-story kitchen ell extends from the rear elevation forming an L plan. The ell is also sided in wood lap siding; its gable roof is covered in standing seam metal. An open-air, shed-roofed porch extends the length of the kitchen ell's rear elevation.



Photo 2-1. Losch Farmstead (BX-0351), Braxton County, View NW

A circa-1890 front gable, wood frame root cellar stands approximately 15 feet north of the farmhouse and sits on a cut stone foundation. The exterior walls are clad in board and batten wood siding. The building's front gable roof is covered in standing seam metal. Located approximately 50 feet east of the farmhouse is a circa-1910 wood frame pigsty. The building's gabled roof is covered in corrugated metal and its exterior walls are clad in vertical wood boards. A circa-1935 front gable, wood frame corn crib stands approximately 125 feet east of the pigsty. The building's front gable is covered in corrugated metal. A circa-1960 shed roof, wood frame privy is sited approximately 75 feet southeast of the pigsty. The building's exterior is clad in board and batten siding; the shed roof is covered in corrugated metal. A circa-1890, front gable, one-and-a-half-story timber frame barn is sited approximately 250 feet southwest of the farmhouse at the base of the driveway along CR 4/4. The barn's exterior is clad in wood clapboard siding—missing boards reveal that the half-story served as a hay loft. The front gable roof is covered in standing seam metal; a metal ventilator pierces the roof's ridge line at its mid-point. Window openings along the eaves sides indicate the lower story served as animal housing.



Mountain Valley Pipeline Project

NAD 1983 UTM 17N

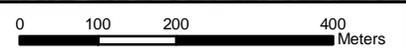


Figure 2-1
NRHP Boundary:
Losch Farmstead
(BX-0351)

September 2017

Legend

Historic Resource

- Eligible: Criteria A and C
- Milepost
- Proposed Route
- NRHP Boundary
- Limits of Disturbance



Data Sources: NRHP, ESRI Streaming Data, 2015

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

Mountain Valley proposes to cross the Losch Farmstead at approximate milepost 69.9 of the project, for a distance of 3,288 feet. Construction of the belowground pipeline will include short-term, long-term, and permanent impacts on the existing vegetation cover types.¹ Portions of the proposed project's permanent easement located in forested areas will result in tree-clearing and could result in changes to the setting of the property (Figures 3-1 and 3-2). Effects related to vegetation removal within the historic property boundary were among several issues that were the focus of consultation discussions with WVDCH and stakeholders.

The Losch Farmstead is sited in a hollow surrounded by steep, wooded slopes to the north, east, and south. Of the 3,288 feet of the pipeline within the Losch Farmstead historic property boundary, the permanent pipeline right-of-way will not be visible from the farmstead's contributing historic resources (Attachment 1). To the extent possible, Mountain Valley will utilize the Losch Farmstead's existing road to minimize clearing. This 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 the Erosion and Sediment Control Plan approved by the West Virginia Department of Environmental Protection (DEP). Cleared vegetation in non-forested areas will be restored using DEP-approved native seed mixes.

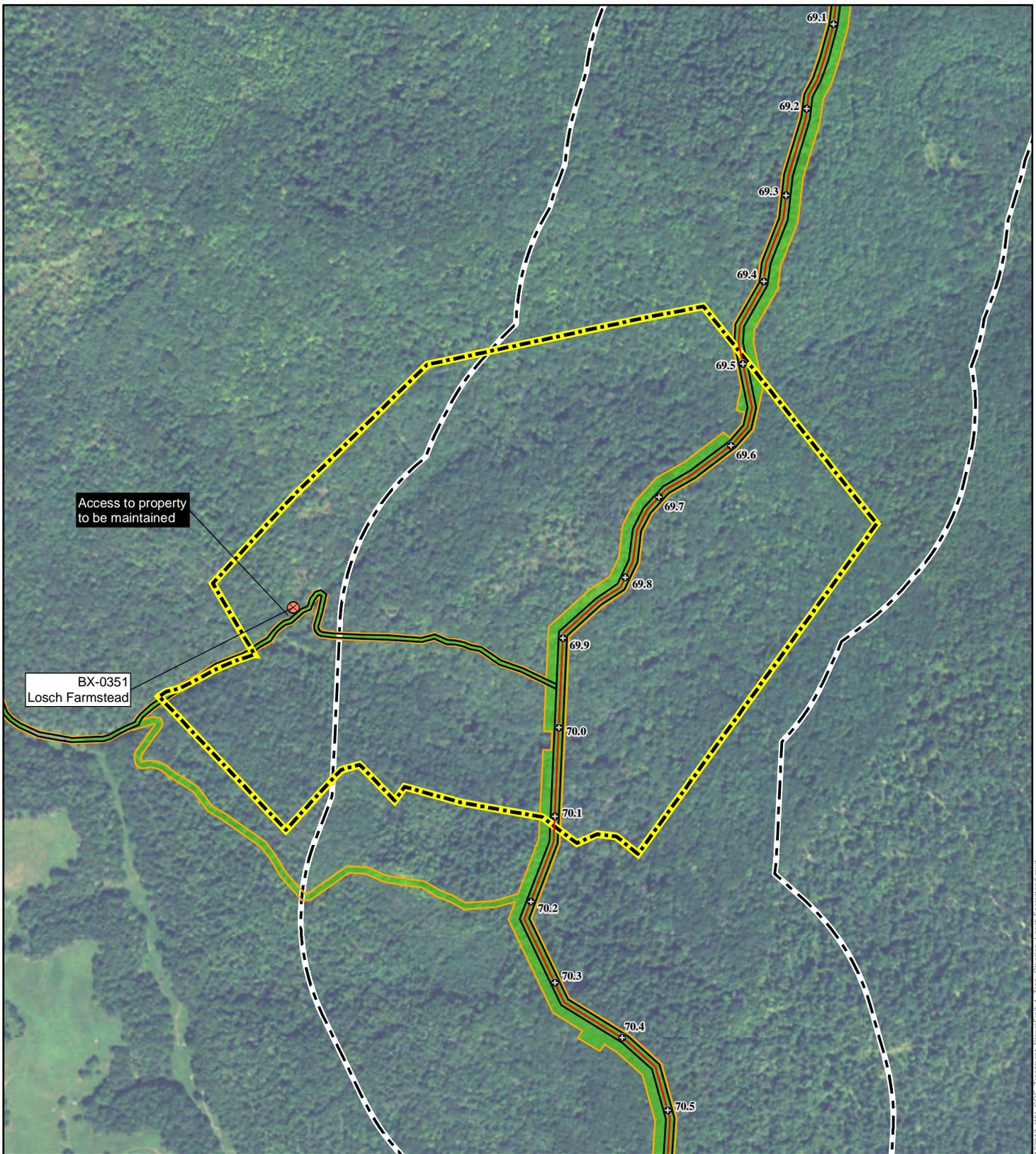
Vegetation removal for Mountain Valley has been minimized to the greatest practicable extent. However, the WVDCH concluded that project-related disturbances resulting from tree-clearing in right-of-way within the historic property boundary will affect the integrity of the property's setting and, as a result, requires treatment.

4.0 MITIGATION OF ADVERSE EFFECTS IDENTIFIED

4.1 Approach to Development of Mitigation

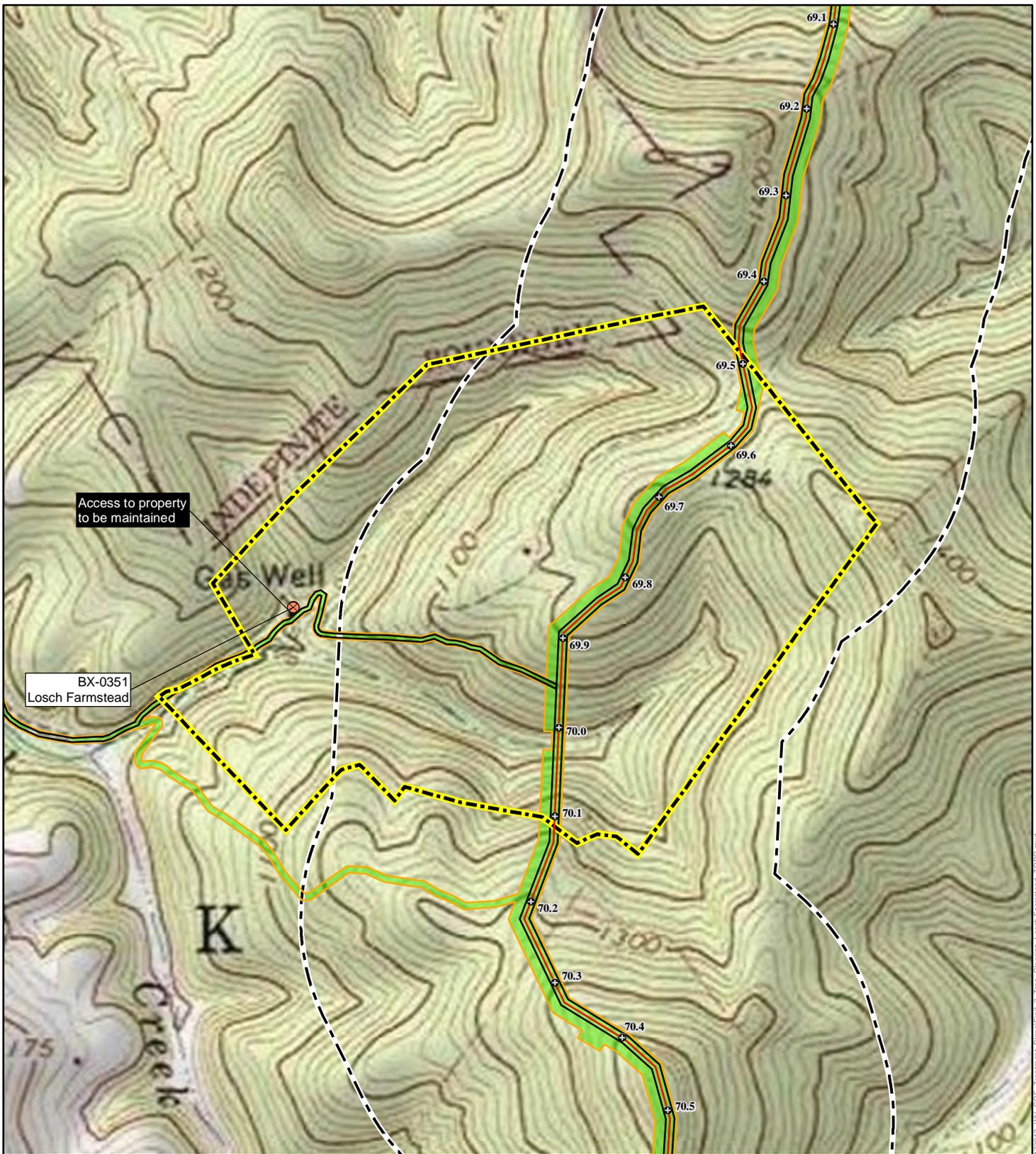
Mountain Valley's selection of appropriate mitigation is guided by three principles: it should (1) have a nexus to the identified adverse effects of the proposed action, (2) be proportional to those effects, and (3) take consideration of the input of consulting parties and local stakeholders. The adverse effect to be mitigated for the Losch Farmstead is, according to WVDCH, the permanent alteration to the farmstead's setting as a result of "planned tree clearance and permanent right-of-way areas." To further clarify this effect and assess its magnitude, it is important to note that WVDCH specifically stated that "indirect effects on the property's main buildings will be minimal." As previously noted, aboveground impacts from this buried natural gas pipeline will be

¹ No aboveground project facilities are proposed within the property's recommended NRHP boundary, or within the property's viewshed



| | | | | |
|---|--|--|------------------|--|
| Mountain Valley Pipeline Project | | | NAD 1983 UTM 17N | |
| | | Legend | | |
| <p>Figure 3-1 Proposed Tree-Clearing Losch Farmstead (BX-0351)</p> <p>September 2017</p> | | <ul style="list-style-type: none"> Milepost Proposed Route NRHP Boundary Permanent Easement Limits of Disturbance Proposed Route Indirect APE Tree Clearing Area | | |
| Data Sources: ESRI Streaming Data, 2015 | | | | |

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Mountain Valley Pipeline Project

**Figure 3-2
Proposed Tree-Clearing
Losch Farmstead
(BX-0351)**

September 2017

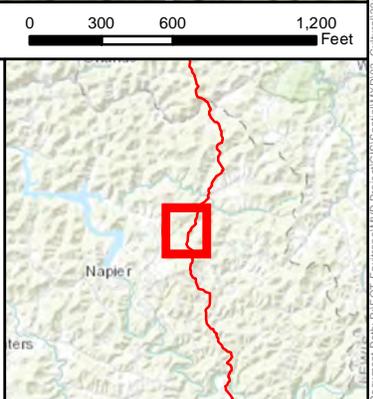
Data Sources: ESRI Streaming Data, 2015

NAD 1983 UTM 17N

0 300 600 1,200 Feet

Legend

- Milepost
- Proposed Route
- NRHP Boundary
- Permanent Easement
- Limits of Disturbance
- Proposed Route Indirect APE
- Tree Clearing Area



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imperceptible due to distance and the screening provided by surrounding topography and vegetation. (Figures 3-1 and 3-2, and Attachment 1).

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. Lastly, there will be no aboveground project facilities placed on the landscape within the historic property boundary or within the property's viewshed. In light of the largely indiscernible indirect impacts on the physical landscape, additional changes to project construction or restoration practices will not effectively ameliorate the adverse effect identified by WVDCH on the property's setting.

Mountain Valley has identified a mitigation measure—the preparation of a multimedia intensive-level documentation of the Losch Farmstead—that directly addresses the potential adverse effect identified by WVDCH to the “setting” of this property for its owners by recording and preserving its historic and cultural significance (including aspects of integrity). This approach is proportional to the long-term physical adverse effect to the historic property. It is also responsive to stakeholder concerns regarding the poorly preserved and rapidly-deteriorating condition of the unoccupied farmstead and addresses the anecdotal significance of this farmstead, which serves to anchor a large and dispersed family.

4.2 Consultation with Consulting Parties and Other Stakeholders

Mountain Valley assisted the FERC with outreach to consulting parties and other stakeholders to identify appropriate mitigation measures for the adverse impacts on the Losch Farmstead. Mountain Valley contacted all five owners of the Losch Farmstead—Elizabeth Losch, Gail Losch, Barbara Nickell, Shirley Nelson, Michael Losch—and held a telephone meeting on September 11, 2017. Appendix A contains copies of telephone records and meeting minutes that document the discussions with the stakeholders.

4.3 Proposed Mitigation Plan

In the September 11, 2017, meeting, stakeholders stated their plans to timber approximately 250 acres of the farm property in quadrants over the next three years, noting that these activities were currently underway. They indicated that this timbering would occur in areas that Mountain Valley proposes to temporarily and permanently utilize as well areas of the property unaffected by the project. Furthermore, the stakeholders stated that despite any efforts on behalf of Mountain Valley to reduce and minimize tree-clearing, the property owners would be timbering in those areas of the property regardless. The property owners voiced concerns regarding the poor condition of the buildings due to deferred maintenance, deterioration, and neglect and expressed a desire to capture, collect, and share historical information regarding the property with their descendants. As a result, the proposed mitigation plan has been focused less on physical preservation of the property's setting and more on preservation through documentation. Mountain Valley's proposed mitigation plan to address potential adverse effects is to prepare, in collaboration with participating

stakeholders, a multimedia documentation of the Losch Farmstead using a combination of text, photography, video and audio.

Mountain Valley will work with the WVDCH to finalize the scope for the documentation package; however, based on previous consultation with the stakeholders, Mountain Valley proposes that the illustrated, printed and bound publication—prepared by a historian or architectural historian meeting the Secretary of the Interior’s *Professional Qualifications Standards*—will comprise the following:

1. **Historical Information** (synthesize results of private and public archival background research and integrate oral histories)
 - A. Physical History
 - B. Historic Context
2. **Architectural Information** (to supplement the information provided in measured drawings and photographs)
 - A. General statement of character and condition
 - B. Description of Exterior
 - C. Description of Interior
 - D. Site
 1. Historic landscape
 2. Outbuildings
3. **Sources of Information**
4. **Supplemental Materials**
 1. Scaled floor plans and exterior elevation drawings (printed copies and digital format on DVD)
 2. Scaled site plan (printed copies and digital format on DVD)
 3. DVD containing interior and exterior digital photographs (captured and stored in accordance with the NPS *National Register Photo Policy*, updated May 2013)
 4. DVD containing high quality scans of historic photographs and other primary source material made available by stakeholders
 4. DVD containing oral history videos captured in accordance to the Oral History Association’s *Principles and Best Practices for Oral History* (2009)
 5. DVD containing digital audio files for oral histories captured in accordance to the *Oral History Association’s Principles and Best Practices for Oral History* (2009)

Mountain Valley will provide 15 copies of the documentation package to be distributed to the five stakeholders (two copies each), the Braxton County Public Library (two copies), the WVDCH (one copy), the West Virginia State Archives (one copy) and the West Virginia and Regional History Collection (one copy).

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 documentation package to the

WVDCH 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
PHOTOGRAPH SIMULATION



Existing Condition

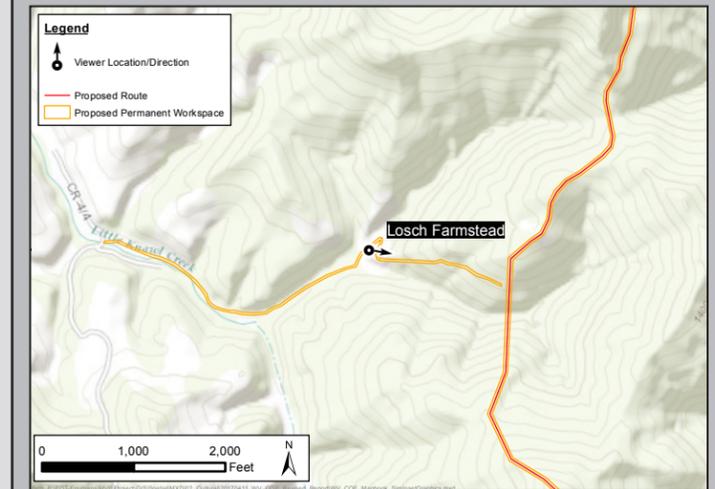


Post Construction (Leaf-off Conditions) - The 50-foot-wide permanent pipeline right-of-way is located approximately 0.3 mile east of Losch Farmstead at its closest point. The red arrows indicate where the pipeline right-of-way would cross hilly terrain. However, views of the pipeline right-of-way would be screened by terrain and vegetation.

Rating for Losch Farmstead Photo Simulation: Inferior

Historic Property Information

| WVSHPO ID | Address/ Location | NRHP Eligibility Determination by WVDCH-SHPO/Date | Report | MP | Nearest Project Feature to Primary Resource | Distance (ft) from Primary Resource to Nearest Project Feature | Nearest Project Feature to the Historic Property Boundary | Distance (ft) from Historic Property Boundary to Nearest Project Feature |
|-----------|----------------------------|--|---------------------|------|---|--|---|--|
| BX-0351 | CR 4/4 (Little Knawl Road) | Eligible: Criterion A Potentially Eligible B and C | Volume 2 Addendum 1 | 69.9 | Access Road Temporary Workspace | 26.5 | Access Road Temporary Workspace | Crosses |



Photograph Information

Time of photograph: 3:55 PM

Date of photograph: 4.24.2017

Weather condition: Overcast

Viewing direction: East

Latitude: 38° 48' 35.84" N

Longitude: 80° 32' 27.70" W

Photo Location: The photo was taken from along CR 4-4/Little Knawl Road, approximately 0.5 mile east of CR 19-12, and approximately 2 miles northeast of the Bulltown, West Virginia.

Mountain Valley Pipeline Project

Losch Farmstead

Braxton County, West Virginia



ATTACHMENT 2
CORRESPONDENCE



TELEPHONE / PERSONAL CONVERSATION REPORT

| | |
|---------------------------|---|
| PROJECT NAME: | Mountain Valley Pipeline |
| MVP TEAM CALLER: | Megan Neylon |
| CONVERSATION WITH: | Losch Farm |
| AGENCY: | N/A |
| EMAIL ADDRESS: | N/A |
| PHONE NUMBER: | 304-872-6584 |
| SUBJECT: | Mitigation for Impacts identified in the WVCOE Letter |
| DATE AND TIME: | See below |

SUMMARY OF CONVERSATION:

08/14/17 5:26 PM - left a message with Michael Losch

08/14/17 5:27 PM - Spoke to Odessa Geary. Braxton County Historical Society has disbanded. However, if we need additional information on historical properties we can send her a letter at 194 N. Baxter Street, Sutton, WV 26601.

08/17/17 3:36 PM - left a message with Michael Losch

08/21/17 3:45 PM – spoke with Elizabeth Losch. Need to get all members of the estate on the phone (Michael Losch, Shirley Nelso, Sandra Losch, Barba Nickell) for a conference call. The best way to get Michael is to call Shirley. Elizabeth does not have a preference of a date or time for the call. Currently there is a timber company timbering the property. John Martin is the forester. Elizabeth mentioned that someone (assumed the timber company) is building up the road for their use.

8/24/17 8:30 AM – spoke to Michael Losch. He is interested in talking with MVP. His only preference of date and time is after 3:30 pm any day.

Conversations were held briefly for MVP to work on acquiring information on the extent of timber clearing occurring on the property and if a treatment plan is still necessary.

9/1/17 12:47 PM – Megan sent an email to Mitch Schaefer with information on the timber operations at Losch farm and requested a meeting to discuss it.



9/6/17 11:00 AM – phone call with Mitch Schaefer to discuss timber operations on the Losch Farm property.

9/6/17 4:54 PM – Email from Mitch on directions for the Losch Farm treatment plan.

9/8/17 10:26 AM – Call with Shirley Nelson would like to have a conference call with everyone. Monday at 4:00 PM would work for her.

9/8/17 10:41 AM – Call with Sandra (Gail) would like to have a conference call with everyone. Monday at 4:00 PM would work for her.

9/8/17 10:49 AM – Call with Elizabeth Losch Monday at 4:00 PM would work for her.

9/8/17 10:53 AM – Called and left a message with Michael Losch's wife. He has changed jobs and his wife does not believe he can get on a call until after 5:30 PM.

9/8/17 12:34 PM – Left a voicemail with Barbara Nickell about the SHPO letter and a conference call. I requested that she give me a call back to discuss.

9/11/17 11:00 AM –confirmation of 5:30 PM conference call with Barbara Nickell

9/11/17 – 10:29 AM - confirmation of a 5:30 PM conference call with Gail Losch

9/11/17 – 10:52 AM – confirmation of a 5:30 PM conference call with Robin Losch

9/11/17 – 10:31 AM – confirmation of a 5:30 PM conference call with Elizabeth Losch

9/11/17– 10:33 AM - confirmation of a 5:30 PM conference call with Shirley Nelson

9/11/17 5:30 PM – Call with Losch Family – Elizabeth Losch, Gail Losch, Barbara Nickell, Shirley Nelson, Michael Losch, Evelyn Tidlow and Hannah Dye

Megan did introductions. Hannah explained the process for field surveys, submitting information



to the SHPO, and why we are trying to mitigate adverse effects.

Losch's explained that the entire property is going to be timbered in quarters. The contact is John Martin (304-642-5597). Timbering is supposed to be done within 2.5 years. Everything over 18-inch diameter will be removed. He refers to it as the Cunningham Farm.

Hannah's mitigation idea include intensive documentation of the property with archival photographs, historic context, property history, etc. All are in agreement that this would be nice to have to pass down through the family.

House has had work completed – roof approximately 8-9 years ago, rooms have been paneled, no electricity but does have gas, some windows are falling in, there is a new kitchen porch and the kitchen floor has been tiled.

Periodically use the cabins for hunting.

Megan explained the schedule for submitting the treatment plan.

The call ended at approximately 6:25 PM.

Contact Signature: _____

MOUNTAIN VALLEY PIPELINE PROJECT

HISTORIC PROPERTY TREATMENT PLAN
St. Bernard's Church and Cemetery (NR#85001583)

DOCKET NO. CP16-10
WVDCH FILE #15-67-MULTI

Prepared for



555 Southpointe Boulevard
Canonsburg, Pennsylvania 15317

Prepared by



661 Andersen Drive
Foster Plaza
Pittsburgh, PA 15220

September 2017

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- Figure 2-1 NRHP Boundary: St. Bernard’s Church and Cemetery (NR#85001583)
- Figure 3-1 Location of St. Bernard’s Church and Cemetery (NR#85001583) and Proposed Tree-Clearing

ATTACHMENTS

- Attachment 1 Photo Simulation
- 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 West Virginia Division of Culture and History-Historic Preservation Unit (WVDCH), 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, WVDCH issued its opinion in a letter dated August 3, 2017, that the proposed project will adversely affect St. Bernard's Church and Cemetery (NR#85001583), a National Register of Historic Places (NRHP)-listed historic resource. The FERC is consulting with the WVDCH 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 St. Bernard's Church and Cemetery. 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 WVDCH. The APE for direct effects for the MVP Project comprised a 91.46-meter (300-foot) corridor centered on the proposed pipeline or 45.7 meters (150 feet) on either side of the pipe centerline. The direct APE also includes the limits of ground disturbance for any ancillary facilities necessary to construct, operate, and maintain the pipeline. Ancillary facilities include compressor stations, access roads, construction staging areas, and temporary workspaces. For an access road, the direct APE was defined as a 30.5-meter (100-foot) corridor centered on the proposed access road or 15.2 meters (50 feet) on either side of the proposed road centerline. The APE for indirect effects accounted for the visual impacts of the project, not only for aboveground Project facilities such as compressor stations, but also for the 15.2-meter (50-foot) corridor

(permanent right-of-way) that will remain after construction to service and maintain the pipeline. The indirect APE was defined as 0.4 kilometers (0.25 miles) on either side of the proposed pipe centerline and a 0.8-kilometer (0.5-mile) radius around the limits of ground disturbance for each compressor station.

Mountain Valley's cultural resources consultants rerecorded the NRHP-listed St. Bernard's Church and Cemetery in Lewis County during the Phase I historic architecture survey conducted in May 2015.

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 St. Bernard's Church and Cemetery.

As noted in Section 4.2 of Mountain Valley's *Criteria of Effects Report* (February 2017), the project's limits-of-disturbance (LOD) will not pass through the historic property boundary. The pipeline will be constructed perpendicular to Loveberry Ridge Road that runs adjacent to the western edge of the historic property boundary. The LOD is approximately 50 feet west of the historic property boundary. Photograph simulations depicting views from St. Bernard's Church and Cemetery towards the project indicated that vegetation thinning and removal will be apparent for approximately 262 feet as the pipeline right-of-way descends a ridge. Conversely, as the pipeline right-of-way turns to follow Loveberry Ridge Road for approximately 493 feet, the right-of-way will appear co-dominant within the context of the existing roadway that it parallels—resulting in incremental visual impacts (Attachment 1). Mountain Valley recommended that these visual impacts will not change the quality of the historical character of the property that qualifies the resource for listing under Criteria A and C. Mountain Valley further recommended that the project will not result in permanent changes to the integrity of the resource's setting that contribute to its significance; the rural character of the church and its sense of place, both central to its significance under NRHP Criteria A and C, will be maintained. The resource does not derive its significance from pristine vistas; visual intrusions occurring outside of the historic property boundary do not interfere with the property's ability to convey its association with Father Thomas Aquinas Quirk or its architectural significance. Mountain Valley's assessment resulted in the recommendation that the proposed undertaking will have no effect on St. Bernard's Church and Cemetery.

WVDCH found, in a letter dated August 3, 2017, that:

Based on the submitted effects report, the pipeline installation will require tree clearance directly within the viewshed of the church and cemetery, and will pass within a few yards of the property permanently altering the surrounding setting. Due to these circumstances, it is our opinion that the proposed pipeline path will have an adverse effect on the church and cemetery...We request you evaluate alternatives for the undertaking to avoid or minimize those effects and then inform us of such.

2.0 ST. BERNARD'S CHURCH AND CEMETERY SETTING AND ASSOCIATION

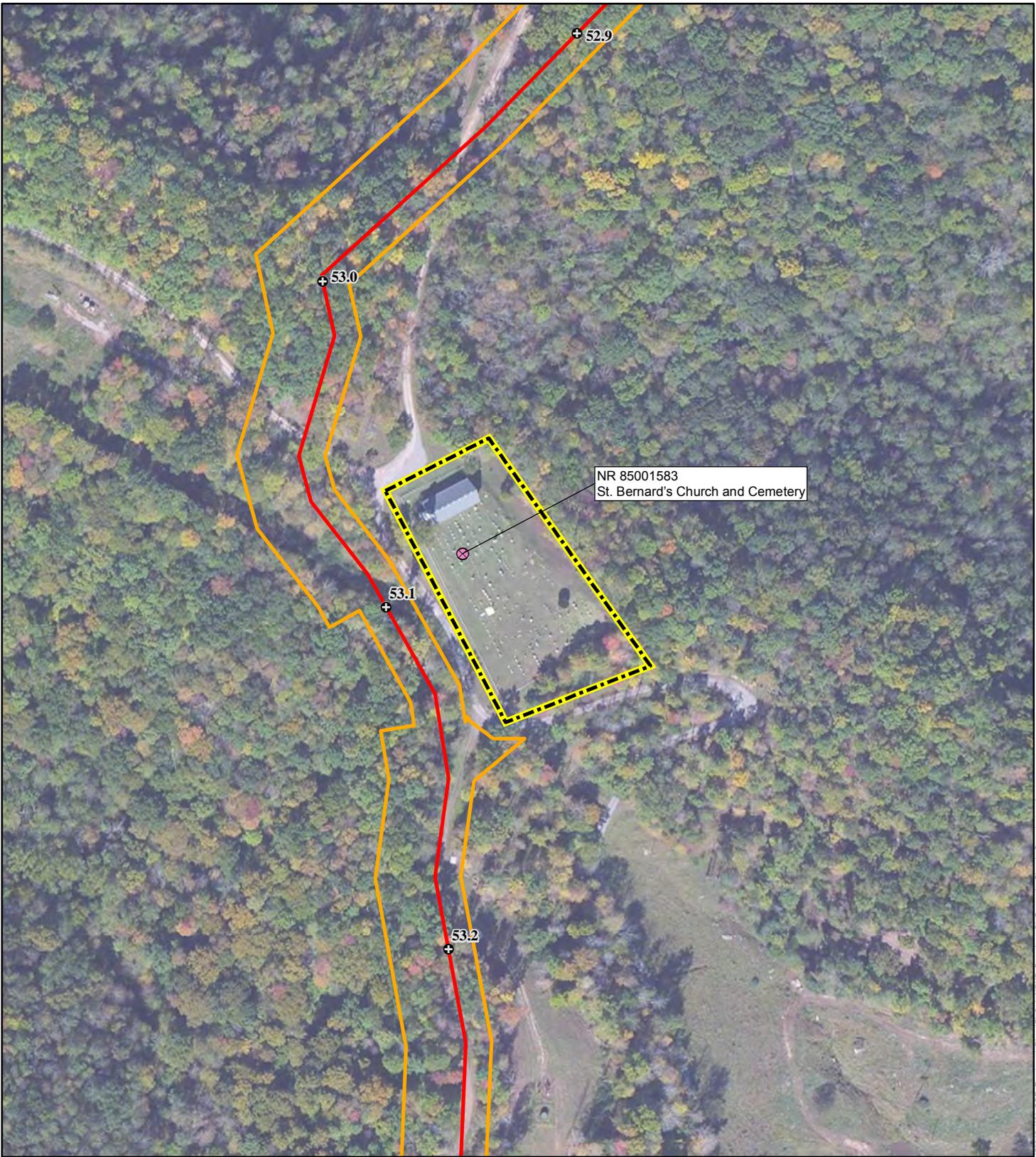
During Phase I survey, Mountain Valley's cultural resources consultant recommended that St. Bernard's Church and Cemetery maintains its NRHP-listed status as it retains the same level of integrity that warranted its listing in the NRHP, according to Criteria A and C, in 2009. The NRHP boundary of the resource is shown on Figure 2-1. The WVDCH concurred with this recommendation in a letter dated October 6, 2015.

The NRHP-listed St. Bernard's Church and Cemetery is a historic Roman Catholic church and cemetery on Loveberry Ridge Road near Camden, Lewis County. It was built in 1909, and is a rectangular gable-roofed, one-story frame structure in the Gothic Revival style. It features a two-story entrance bell tower. The property includes the church cemetery that contains the grave of Father Thomas Aquinas Quirk (1845-1937). Most of the settlers in the region, including the congregants of the church, were of Irish descent (Photo 2-1).



Photo 2-1. St. Bernard's Church and Cemetery (NR 85001583), Camden, Lewis County, Facing SW

The property is significant because, as a unit, these resources form the focal point of much of the life's work of Thomas Aquinas Quirk, a Roman Catholic priest who achieved widespread recognition and acclaim for his religious, social, and humanitarian services to an entire region of central West Virginia for a period of over a half century. The simple white-painted, frame church, often referred to in local history as the "Little Cathedral of the Wilderness," is equally significant as a prominent surviving building associated with the nineteenth and early twentieth-century settlement of the Loveberry-Cove Lick-Camden-Murray settlement areas of Lewis County, West Virginia, by Irish immigrants.



Mountain Valley Pipeline Project NAD 1983 UTM 17N

0 50 100 200 Meters



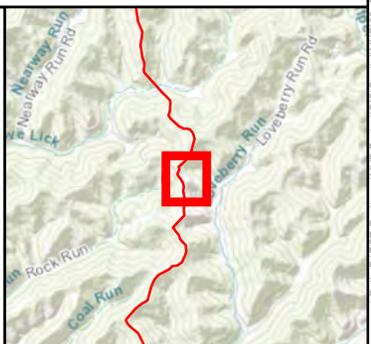
Figure 2-1
NRHP Boundary:
St. Bernard's Church and Cemetery
(NR 85001583)

September 2017

Legend

Historic Resource

-  NRHP-Listed
-  Milepost
-  Proposed Route
-  NRHP Boundary
-  Limits of Disturbance



Data Sources: NRHP, ESRI Streaming Data, 2015

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

As previously noted, Mountain Valley does not propose to cross the St. Bernard's Church and Cemetery historic property boundary. However, construction of the belowground pipeline within the viewshed of the property will include short-term, long-term, and permanent impacts on the existing vegetation cover types.¹ Portions of the proposed project's permanent easement located in forested areas within the historic property's viewshed (approximately 262 feet) will result in tree-clearing and, as WVDCH concluded, may result in changes to the setting of the property (Figure 3-1).

To the extent possible, the pipeline has been aligned parallel to existing utility rights-of-way and other linear features. The pipeline right-of-way will parallel Loveberry Ridge Road for approximately 493 feet in the direct vicinity of the St. Bernard's Church and Cemetery property. Construction of the pipeline adjacent to the existing right-of-way will minimize land use change as well as visual impacts which will appear co-dominant in the landscape within the context of the existing right-of-way to which the pipeline parallels (Attachment 1).

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 the Erosion and Sediment Control Plan approved by the West Virginia Department of Environmental Protection (DEP). Cleared vegetation will be restored using DEP-approved native seed mixes. Vegetation removal for the Mountain Valley has been minimized to the greatest practicable extent. However, the WVDCH concluded that project-related disturbances resulting from tree-clearing in right-of-way areas within the viewshed of the historic property will affect the integrity of the property's setting and, as a result, requires treatment.

¹ No aboveground project facilities are proposed within the NRHP boundary for St. Bernard's Church and Cemetery or within the viewshed of the property



Mountain Valley Pipeline Project NAD 1983 UTM 17N

0 200 400 800 Feet

Figure 3-1
Proposed Tree-Clearing
St. Bernard's Church and Cemetery
(NR 85001583)

September 2017

Legend

- Milepost
- Proposed Route
- NRHP Boundary
- Permanent Easement
- Limits of Disturbance
- Proposed Route Indirect APE
- Tree Clearing Area



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 St. Bernard’s Church and Cemetery is, according to WVDCH, the permanent alteration to the property’s setting as a result of “tree clearance directly within the viewshed of the church and the cemetery.”

Aboveground impacts from this buried natural gas pipeline will be largely imperceptible following the restoration of the right-of-way, particularly where the pipeline will parallel the existing roadway appearing co-dominant within the context of the surrounding landscape (Attachment 1). The exception to this are those 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 (Figure 3-1). Lastly, there will be no aboveground project facilities placed on the landscape within the NRHP boundary or within the viewshed of the property. 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 WVDCH on the property’s setting.

Mountain Valley has identified mitigation measures—the preparation of a Historic Structure Report (HSR) and funding for implementing repairs as prescribed in the HSR—that directly address the potential adverse effect identified by WVDCH to the “setting” of the property. Recognized as an effective part of preservation planning, an HSR will contribute to the future preservation of the setting of the church and cemetery. This approach is proportional to the minimal long-term physical adverse effect to the historic property and is also responsive to feedback Mountain Valley received during consultation with stakeholders.

4.2 Consultation with Consulting Parties and Other Stakeholders

Mountain Valley assisted the FERC with outreach to consulting parties and other stakeholders to identify appropriate mitigation measures for the adverse impacts on St. Bernard’s Church and Cemetery. Mountain Valley contacted Fr. James R. DeViese, Priest-Secretary to the Bishop of the Catholic Diocese of Wheeling-Charleston, and held a meeting on August 31, 2017, at St. Patrick’s Catholic Church in Weston, West Virginia. At the meeting, Fr. DeViese prioritized the potential mitigation measures discussed in the following order:

1. Historic Structures Report
2. Exterior restoration and stabilization of the church
3. Restoration and conservation of important headstones in the cemetery
4. Restoration of the rod iron fencing surrounding the church and cemetery

5. NRHP Nomination (Multiple Property Submission) for all churches associated with Monsignor Quirk

In a telephone meeting September 6, 2017, between Mountain Valley and WVDCH, Mountain Valley outlined the potential mitigation strategies discussed at the August 31, 2017, meeting with Fr. DeViese. WVDCH indicated by email (September 6, 2017) that staff approved of the potential mitigation measures listed above, with the exception of #5 (NRHP Nomination Multiple Property Submission).

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 August 31, 2017, meeting, Fr. DeViese indicated that the church and cemetery are in need of maintenance, repair, restoration, and stabilization. Furthermore, he expressed concerns regarding the increased exposure to the elements the property may sustain as a result of project-related tree-clearing and the threats the additional exposure could pose to the church's exterior. As a result, the proposed mitigation plan has been focused on equipping Catholic Diocese of Wheeling-Charleston with the tools necessary to address these issues.

Mountain Valley's proposed mitigation plan to address potential adverse effects is to first fund and manage the preparation of an HSR to be prepared by a team comprising, minimally, a historic preservation architect, architectural historian, and a structural engineer. The HSR will be produced according to "Standards and Guidelines for Historic Structure Reports" defined in the National Park Service's (NPS) *Cultural Resource Management Guidelines*. With a research aim, the HSR will provide insight on the importance and integrity of the church and cemetery, covering original development of the site to existing conditions. Further, it will outline strategies for ongoing preservation that are relevant to future work. It will serve as a special purpose study to support planning, cultural resource management and design/construction programs. It can be referenced repeatedly and its contents are the basis for progressive decisions that influence and direct architectural and technical solutions. Used appropriately, the factual and detailed information and recommendations will inform management on appropriate approaches and treatments for resource conservation while maintaining the property's historic integrity.

Secondly, Mountain Valley will provide a maximum of \$40,000 in funds to be used, at the discretion of the Catholic Diocese of Wheeling-Charleston, for the purpose of implementing repairs to the church and/or cemetery as prescribed in the HSR.

Mountain Valley will work with the WVDCH to finalize the scope for the HSR. Recognizing that the NPS recommends that no restoration, reconstruction, or extensive rehabilitation of historic buildings or structures be undertaken without an approved HSR, Parts 1 and 2, Mountain Valley assumes that the multidisciplinary team of professionals will produce a complete HSR following all NPS guidelines and requirements. Minimally, the HSR will include:

1.0 Front Matter

- 1.1 Cover Page
- 1.2 Table of Contents
- 1.3 Executive Summary
- 1.4 Administrative Data

2.0 Part 1 - Developmental History

- 2.1 Historical Background and Context
- 2.2 Chronology of Development and Use
- 2.3 Physical Description
- 2.4 Character Defining Features
- 2.5 Condition Assessment

3.0 Part 2 - Treatment and Use

- 3.1 Ultimate Treatment and Use
- 3.2 Requirements for Treatment
- 3.3 Alternatives for Treatment
- 3.4 Assessment of Effect for Recommended Treatments

4.0 Appendices

- 4.1 Bibliography
- 4.2 Photographs and Images
- 4.3 Drawings
- 4.4 Historic Documents
- 4.5 Historic Materials Analysis
- 4.6 Supplementary Reports (if applicable)

5.0 SCHEDULE

Within four 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 HSR to the WVDCH 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
PHOTOGRAPH SIMULATION



Existing Condition



Construction Impacts

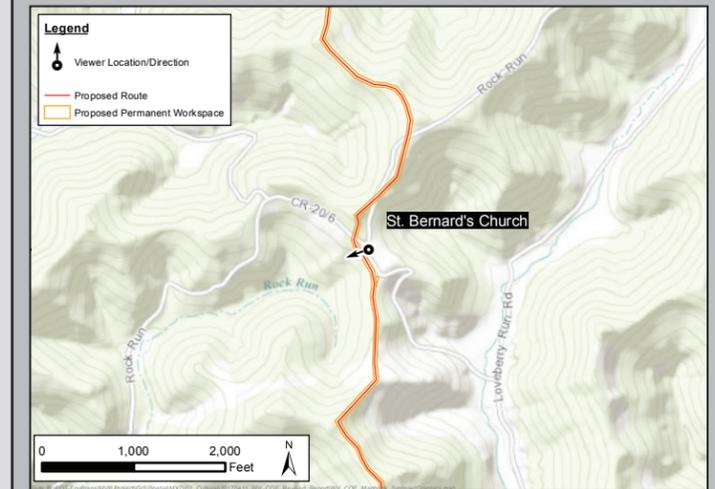
The above image show the expected construction impacts resulting from clearing vegetation and ground cover along the 50-foot-wide pipeline right-of-way. The white arrow indicates where the pipeline right-of-way would be located.



Post-Construction/Revegetation

The above image shows the expected post-construction condition resulting from revegetation of the 50-foot-wide pipeline right-of-way.

Rating for St. Bernard's Church and Cemetery Photo Simulation: Co-Dominant



Photograph Information

Time of photograph: 5:29 AM
 Date of photograph: 4.14.2017
 Weather condition: Overcast
 Viewing direction: Southwest
 Latitude: 38° 59' 35.47" N
 Longitude: 80° 35' 35.15" W
 Photo Location: The photo was taken southwest of the intersection of CR 17-2/Rock Run Road and Loveberry Ridge Road, and approximately 4.5 miles south of the community of Camden, West Virginia.

Mountain Valley Pipeline Project

St. Bernard's Church and Cemetery

Lewis County, West Virginia



ATTACHMENT 2
CORRESPONDENCE



TELEPHONE / PERSONAL CONVERSATION REPORT

| | |
|---------------------------|---|
| PROJECT NAME: | Mountain Valley Pipeline |
| MVP TEAM CALLER: | Megan Neylon |
| CONVERSATION WITH: | St. Bernard's Church and Cemetery |
| AGENCY: | Church |
| EMAIL ADDRESS: | N/A |
| PHONE NUMBER: | 304-269-3048 |
| SUBJECT: | Mitigation for Impacts identified in the WVCOE Letter |
| DATE AND TIME: | See below |

SUMMARY OF CONVERSATION:

08/14/17 5:12 PM Left a message on a voicemail for Sandra at St Patrick's Church to call me back.

08/14/17 5:43 PM Received a call back from Sandra. She will request that Father DeViese give me a call on 8/15/17.

8/21/17 3:34 PM Spoke to Sandra. Let her know that I still had not heard from Father DeViese. She said that she would touch base with him and request again that he call me.

8/23/17 9:03 AM Received a voicemail from Father DeViese to call him back

8/23/17 10:37 AM Returned Father DeViese's phone call and scheduled a meeting for Tuesday 8/29/17 at 3:00 PM.

8/28/17 8:35 AM Megan sent an email requesting that the meeting be rescheduled due to a death.

8/28/17 10:25 AM Father DeViese agreed to reschedule the meeting to Thursday 8/31/17 at 10:00 AM.

8/31/17 10:00 AM Meeting with Father DeViese at St Patrick's Church in Weston WV. Attendants: Megan Neylon and Hannah Dye. Attempted to call Evelyn Tidlow but cell phone service did not allow for the call.

We began the meeting by explaining the Mountain Valley Pipeline Project and the FERC process. We presented Father DeViese with mapping of the overall Project and a figure showing the pipeline in relation to St. Bernard's Church and Cemetery. Hannah then explained the criteria of effects process and the West Virginia State Historic Preservation Office letter claiming adverse effects to St Bernard's Church and Cemetery. Father DeViese explained that the church has not been functional since the 1980's but is used occasionally for masses for the local Loveberry community. Father DeViese did mention that they are working with the State Records Office to identify the more than 420 graves buried in the cemetery. He also mentioned that the parish is working with an adjacent landowner to acquire additional property for the cemetery. Additional people in the Loveberry community have expressed that they would like to be buried there. Hannah explained that one of the mitigation options that could be considered is MVP assisting in restoring headstones within the cemetery. MVP would work with the church to restore a section of the cemetery or the headstone of Monsignor Quirk.

Father DeViese explained that he has concerns with the tree clearing in such close proximity to the church and the impact that additional wind, rain, and environmental exposure will have on the exterior of the church. He explained that there is already a mold and water issue in the area of the bell tower. Father DeViese also mentioned that the bell tower issue was just the start of a very long maintenance list. Hannah suggested that we complete a historic structures report. A historic structures report would identify maintenance and restoration issues, prioritize those issues, and assist the church with maintenance grants in the future. Additional maintenance issues included stabilization and restoration of the church exterior and restoration of the rod iron fence surrounding the church and cemetery.

Father DeViese prioritized the treatment options in the following order:

1. Historic Structures Report
2. Exterior restoration and stabilization of the church
3. Restoration and conservation of important headstones in the cemetery
4. Restoration of the rod iron fencing surrounding the church and cemetery
5. Multi-church nomination of all churches associated with Monsignor Quirk (WVSHPO did not agree with this as a treatment plan option in an email on 9/6/17).

We agreed to add two of these items to the treatment plan and leave the others as



alternatives. We were instructed to put the treatment plan together and send it to Father DeViese. Father DeViese is required to submit any treatment plan to the Dioceses of Wheeling Buildings and Properties Office for review and then to the Bishop.

MVP asked if there were any additional parties that would be interested in reviewing and providing comments on the treatment plans. Father DeViese confirmed that the only two would be the Loveberry Trust and Monsignor Quirk's great-great nephew who is also Monsignor Quirk. Father DeViese will communicate directly with the Loveberry Trust and Monsignor Quirk will be involved with the review when presented to the Bishop.

The meeting concluded at approximately 12:00 pm

Contact Signature: _____

From: Schaefer, Mitchell K [<mailto:Mitchell.K.Schaefer@wv.gov>]
Sent: Wednesday, September 06, 2017 1:45 PM
To: Neylon, Megan <MNeylon@egt.com>
Subject: Mountain Valley Pipeline; Conference Call, Proposed Mitigation Measures (FR:15-67-MULTI)

Megan,

I just spoke with Susan regarding the proposed mitigation measures for MVP. She, Jeff, and I were amenable to all proposals for the Underwood Farm and St. Bernard's Church & Cemetery, except for the plan to prepare NRHP nominations for the various different churches in the area.

Regarding the Losch Farm, Susan would like to see the MOA drafted in a manner that would plan for the two situations: 1. if the timbering activity will clear areas the pipeline would have, or 2. if the timbering activities do not clear areas the pipeline will need to use. The MOA should include outlines of what will happen if either case becomes the reality.

Finally, I'm attaching a consultants list to this email that our grants/tax credits team uses regularly.

Don't hesitate to let me know if you have any questions.

MITCHELL K. SCHAEFER

Structural Historian

State Historic Preservation Office

West Virginia Division of Culture and History

Email: mitchell.k.schaefer@wv.gov

Phone: (304) 558-0240, ext. 156

MOUNTAIN VALLEY PIPELINE PROJECT
HISTORIC PROPERTY TREATMENT PLAN
Underwood Farmstead (LE-0150)

DOCKET NO. CP16-10
WVDCH FILE #15-67-MULTI

Prepared for



555 Southpointe Boulevard
Canonsburg, Pennsylvania 15317

Prepared by



661 Andersen Drive
Foster Plaza
Pittsburgh, PA 15220

September 2017

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FIGURES

Figure 2-1 Recommended NRHP Boundary: Underwood Farmstead (LE-0150)

Figure 3-1 Location of Underwood Farmstead (LE-0150) and Proposed Tree-Clearing

ATTACHMENTS

Attachment 1 Photo Simulation

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 West Virginia Division of Culture and History-Historic Preservation Unit (WVDCH), 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, WVDCH issued its opinion in a letter dated August 3, 2017, that the proposed project will adversely affect the Underwood Farmstead (LE-150), a historic resource determined eligible for the National Register of Historic Places (NRHP). The FERC is consulting with the WVDCH 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 Underwood Farmstead. 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 WVDCH. The APE for direct effects for the MVP Project comprised a 91.46-meter (300-foot) corridor centered on the proposed pipeline or 45.7 meters (150 feet) on either side of the pipe centerline. The direct APE also includes the limits of ground disturbance for any ancillary facilities necessary to construct, operate, and maintain the pipeline. Ancillary facilities include compressor stations, access roads, construction staging areas, and temporary workspaces. For access roads, the direct APE was defined as a 30.5-meter (100-foot) corridor centered on the proposed access road or 15.2 meters (50 feet) on either side of the proposed road centerline. The APE for indirect effects accounted for the visual impacts of the project, not only for aboveground project facilities such as compressor stations, but also for the 15.2-meter (50-foot) corridor

(permanent right-of-way) that will remain after construction to service and maintain the pipeline. The indirect APE was defined as 0.4 kilometers (0.25 miles) on either side of the proposed pipe centerline and a 0.8-kilometer (0.5-mile) radius around the limits of ground disturbance for each compressor station.

Mountain Valley's cultural resources consultants identified the Underwood Farmstead (LE-0150) in Lewis County during the Phase I historic architecture survey conducted in May 2015.

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 Underwood Farmstead.

As noted in Section 4.2 of Mountain Valley's *Criteria of Effects Report* (February 2017), a 50-foot permanent pipeline easement will run inside and alongside the central western and southern edges of the Underwood Farmstead's historic property boundary (thereby resulting in an effect to the property). However, Mountain Valley recommended that this change in the landscape will not introduce an effect that diminishes the significant architectural or agricultural features of the property. Furthermore, along the western property boundary, the proposed pipeline corridor will pass through an open field along a tax parcel boundary. The open field will be restored to pre-construction conditions. Photograph simulations depicting views from the Underwood Farmstead towards the project indicated that visual impacts will appear dominant at the very top of a ridge where vegetation will be removed (creating a "notch" effect in the ridgeline). Conversely, views of the right-of-way as it descends the ridge would be partially screened by terrain and vegetation resulting in only incremental changes to the existing setting of the resource (Attachment 1). As previously noted, this wooded area along the central western and southern edges of the tax parcel boundary through which the pipeline corridor will pass does not play a role in conveying the architectural or agricultural significance of the property. As such, Mountain Valley's assessment resulted in a recommendation that changes in the landscape will not occur to an extent that will diminish the property's integrity; the rural character of the farmstead and its sense of place will be maintained. Visual intrusions will not interfere with significant views from within the historic property boundary that are vital in conveying the farmstead's historic significance according to NRHP Criteria A and C. Following careful study of the project and its relationship to the Underwood Farmstead, Mountain Valley recommended that the proposed undertaking would have no adverse effect on the historic property.

WVDCH found, in a letter dated August 3, 2017, that:

Based on the submitted effects report, the pipeline and necessary access roads will cross the immediate property. Thus, planned tree clearance and permanent right-of-way areas will permanently alter the farmstead's setting. Though indirect effects on the property's main buildings will be minimal, it is our opinion the proposed work will adversely affect the Underwood Farmstead. ... We request you evaluate alternatives for the undertaking to avoid or minimize those effects and then inform us of such.

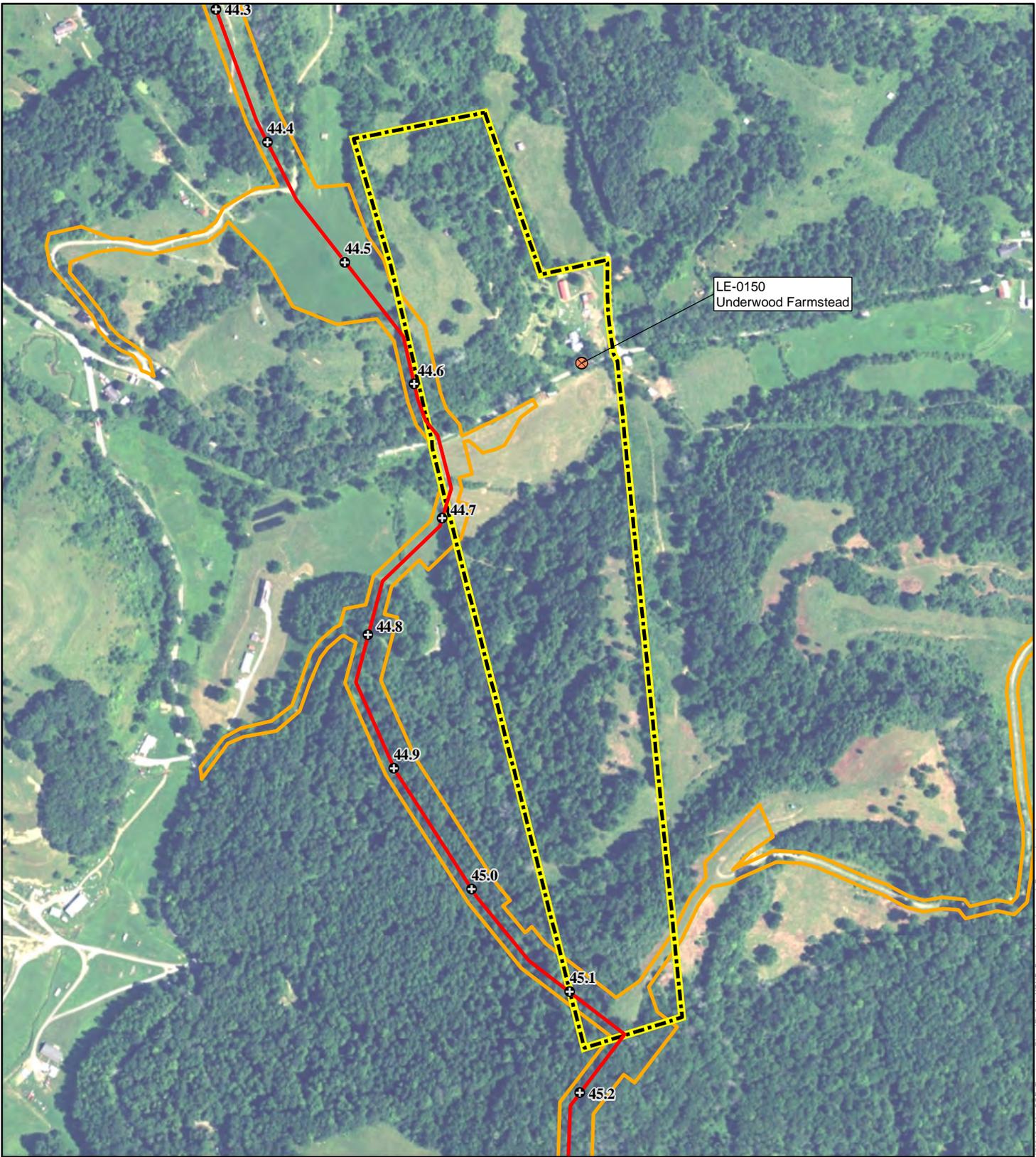
2.0 UNDERWOOD FARMSTEAD SETTING AND ASSOCIATION

During Phase I survey, Mountain Valley’s cultural resources consultant recommended the Underwood Farmstead as eligible under both Criterion A and Criterion C. The house and associated outbuildings convey their original function and purpose and represent the way in which small, early twentieth-century farms helped develop Lewis County. The Underwood Farmstead residence exemplifies a distinctive vernacular house form and has undergone few alterations. Coupled with the collection of relatively well-preserved and unaltered outbuildings, the property presents a clear picture of an early twentieth-century farm in Lewis County. The proposed period of significance is when the residence and associated outbuildings were constructed circa 1900 and the proposed NRHP boundary for this resource is the current tax parcel boundary. The WVDCH concurred with this eligibility recommendation and boundary definition in a letter dated October 6, 2015. The NRHP boundary of the resource is shown on Figure 2-1.

Located on Freeman’s Creek Road, near Camden, Lewis County, the Underwood Farmstead includes nine buildings: a main house with an attached root cellar, a barn, a granary, two garages, two machine sheds, and two tool sheds or outhouses. The circa-1900, two-story, five-bay, side-gable I-house has a rectangular footprint, sits on a rusticated concrete block foundation, is clad with drop siding, has a standing seam-metal roof, and two end chimneys. A one story ell occupies the western half of the northern (rear) elevation. A nearly full-width front porch with a pent roof shelters a pair of windows flanking the entry door with transom. Windows throughout have 1/1 double-hung sash. Located of the northwest corner of the house, and now attached by a breezeway and an extension of the roof of the ell is a terra cotta block root cellar (Photo 2-1).



Photo 2-1. Underwood Farmstead (LE-150), Camden, Lewis, facing north.



Mountain Valley Pipeline Project NAD 1983 UTM 17N

0 100 200 400 Meters

Figure 2-1
NRHP Boundary:
Underwood Farmstead
(LE-0150)

September 2017

Legend

Historic Resource

- Eligible: Criteria A and C
- Milepost
- Proposed Route
- NRHP Boundary
- Limits of Disturbance



Data Sources: NRHP, ESRI Streaming Data, 2015

The barn sits across County Route (CR) 10 from the house; it is mostly obscured from view by vegetation. It is a large, gable-front barn with added side aisles and a shed roof covered addition at the rear. It is clad in vertical board siding and has a metal roof. Adjacent to the barn is a large, shed-roofed machine shed with vertical board siding and a metal roof. Based on the 1977 edition of the USGS Camden Quadrangle map, this garage was added after 1977. Also on the same side of CR 10 is a combination machine shed/animal shelter with vertical board siding and a standing seam metal roof. To the southeast of the house is a tall, narrow granary raised on wooden piles with vertical board siding, a metal roof, and an animal shelter off to one side. Two small sheds with vertical board siding and metal roofs are located near the granary. One has a shed roof, the other has a shallow peaked roof. Located on the opposite side of CR 10 from the house and granary is a garage, with a terra cotta block foundation, vertical board siding, and a metal roof. Based on the 1977 edition of the USGS Camden Quadrangle map, this garage was added between 1964 and 1977. Also on the property is another one-car garage with vertical board siding. Standing adjacent to this building is an open-air machine shed with vertical siding. The property also includes two small shed-roofed buildings with vertical board siding that appear to have served as outhouses.

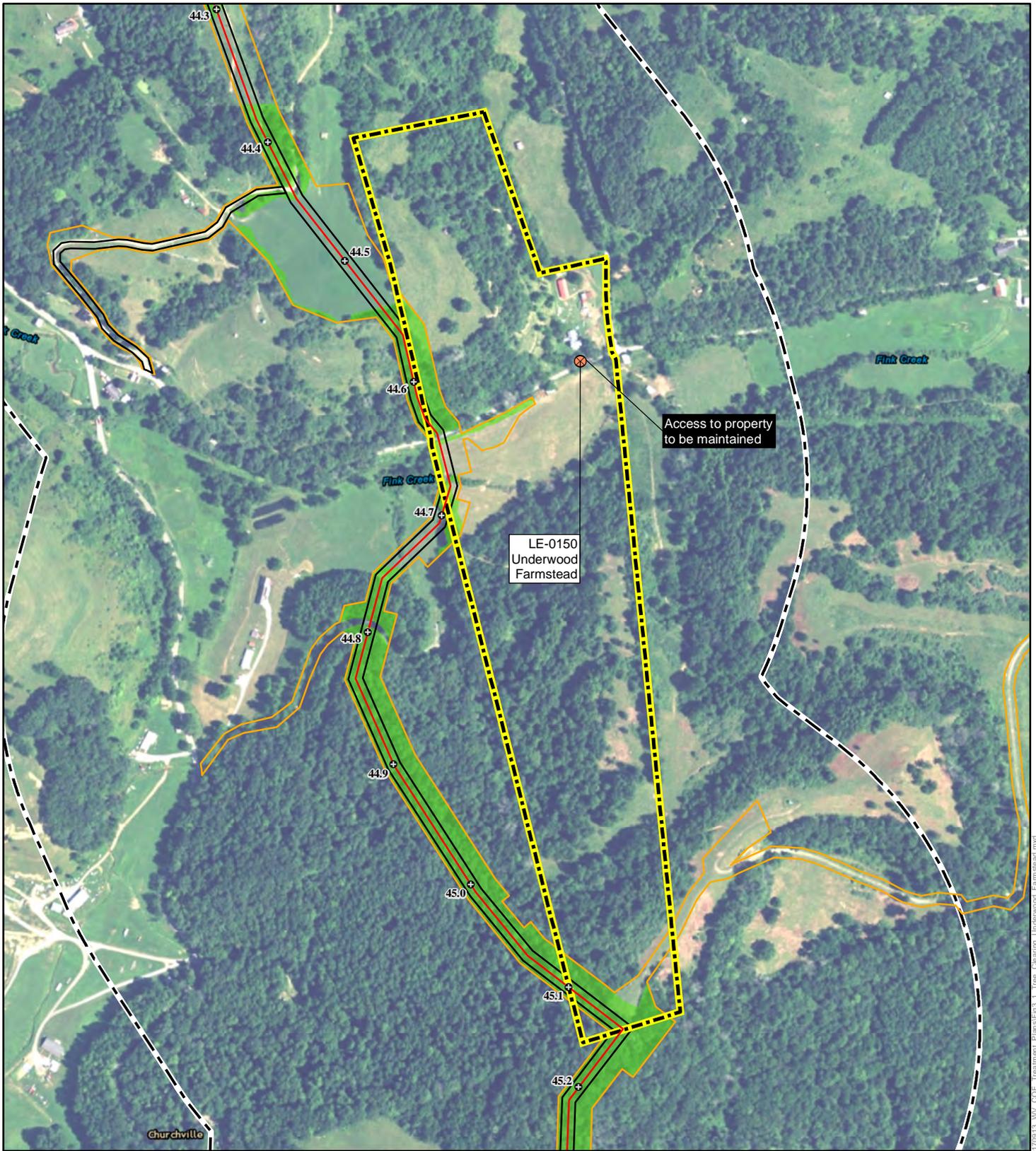
3.0 DESCRIPTION OF MOUNTAIN VALLEY AS IT AFFECTS PROPERTY SETTING AND ASSOCIATION

Mountain Valley proposes to cross the Underwood Farmstead at approximate milepost 44.6 of the project, for a distance of approximately 548 feet. Construction of the belowground pipeline will include short-term, long-term, and permanent impacts on the existing vegetation cover types.¹ All of the approximately 548 feet of the proposed project's permanent easement located within the Underwood Farmstead's historic property boundary will result in tree-clearing and could result in changes to the setting of the property (Figure 3-1).

Mountain Valley will utilize approximately 122 feet of the existing Freeman's Creek Road and approximately 110 feet of an existing farm road within the historic property boundary in order to 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 the Erosion and Sediment Control Plan approved by the West Virginia Department of Environmental Protection (DEP). Cleared vegetation will be restored using DEP-approved native seed mixes, except in active agricultural lands that will be returned to their prior use.

Vegetation removal for the Mountain Valley has been minimized to the greatest practicable extent. However, the WVDCH concluded that project-related disturbances resulting from tree-clearing in right-of-way areas within the historic property boundary will affect the integrity of the property's setting and, as a result, requires treatment.

¹ No aboveground project facilities are proposed within the Underwood Farmstead's historic property boundary or within the property's viewshed



Mountain Valley Pipeline Project

NAD 1983 UTM 17N



**Figure 3-1
Proposed Tree-Clearing
Underwood Farmstead
(LE-0150)**

September 2017

Legend

- ⊕ Milepost
- Proposed Route
- ▭ NRHP Boundary
- ▭ Permanent Easement
- ▭ Limits of Disturbance
- ▭ Proposed Route Indirect APE
- ▭ Tree Clearing Area



Data Sources: ESRI Streaming Data, 2015

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 Underwood Farmstead is, according to WVDCH, is the permanent alteration to the farmstead’s setting as a result of “planned tree clearance and permanent right-of-way areas.” To further clarify this effect and assess its magnitude, it is important to note that WVDCH specifically stated that “indirect effects on the property’s main buildings will be minimal.” 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 (Figure 3-1).

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 historic property boundary or within the property’s viewshed. 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 WVDCH on the property’s setting.

Mountain Valley has identified mitigation measures—the preparation of both a NRHP nomination and a West Virginia Development Grant application for the Underwood Farmstead—that directly address the potential adverse effect identified by WVDCH to the “setting” of the property for its owner, local residents, and visitors by providing official recognition of its historic and cultural significance. This approach is proportional to the minimal long-term physical adverse effect to the historic property and is responsive to input Mountain Valley received during consultation with stakeholders.

4.2 Consultation with Consulting Parties and Other Stakeholders

Mountain Valley assisted the FERC with outreach to consulting parties and other stakeholders to identify appropriate mitigation measures for the adverse impacts on the Underwood Farmstead. Mountain Valley contacted the property’s owner, Mr. Jesse Shackelford, and held a telephone meeting with Mr. Shackelford on August 16, 2017. Appendix A contains copies of telephone records and meeting minutes that document these discussions.

4.3 Proposed Mitigation Plan

In the meeting with the property owner, Mr. Shackelford indicated that historic architectural resources contributing to the property’s significance are in need of maintenance, stabilization, and

repair. As a result, the proposed mitigation plan has been focused on the future preservation of the setting of the property and equipping the property owner with the tools necessary to achieve this goal while maintaining the historic integrity of the property. Mountain Valley's proposed mitigation plan to address potential adverse effects is to first fund and manage the preparation of a NRHP nomination for the historic property by a qualified historian or architectural historian meeting the *Secretary of the Interior's Professional Qualification Standards*. The nomination will allow the Underwood Farmstead to be designated as a NRHP-listed property. The designation of the property will qualify the property owner to apply for grant funding available through multiple historic preservation programs including the West Virginia Development Grant Program. Secondly, Mountain Valley will fund and manage the preparation of a grant application for this specific program. The grant application will be completed with the assumption that the NRHP nomination process will be successful and that the application will be submitted to WVDCH by the property owner following the Underwood Farmstead's receipt of the NRHP designation. The grant application will be prepared in accordance with the "Development Grants Guidelines" contained within WVDCH's *Grants Program Manual*.

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

1. Review existing survey, historical research, publications, and architectural traditions related to the property;
2. Propose an approximate Period of Significance and Boundary;
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 NRHP nomination (although not anticipated, a second draft submission may be required at the discretion of the WVDCH, if warranted due to substantive comments);
5. Prepare final NRHP nomination subsequent to WVDCH review of the draft 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)

5.0 SCHEDULE

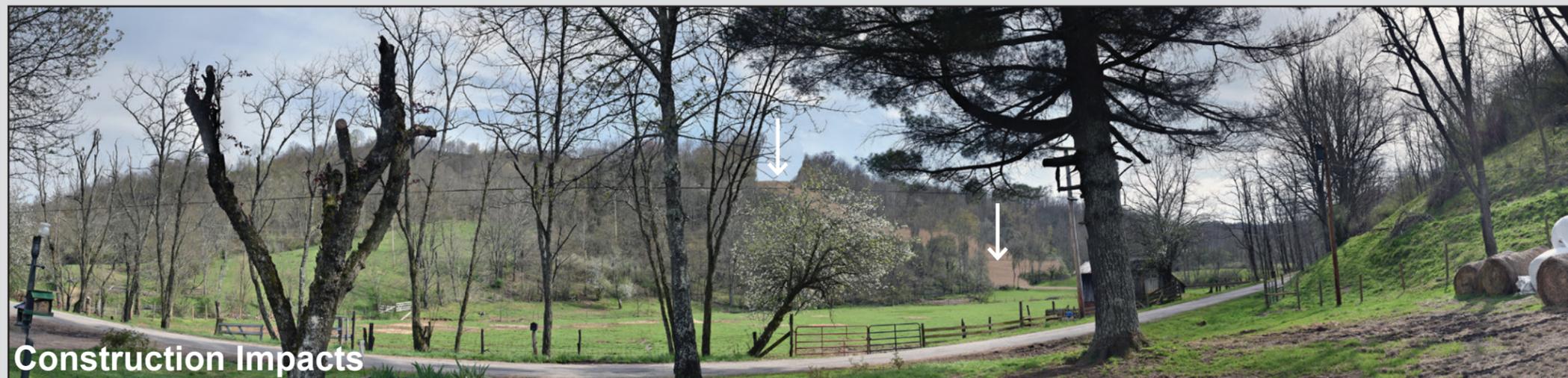
Within two months of issuance of the FERC Certificate for the project, Mountain Valley will develop and submit a final scope of work and cost estimate for the NRHP nomination and grant application to the WVDCH for review and approval. The final scope of work and funding will be

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
PHOTOGRAPH SIMULATION



Existing Condition



Construction Impacts

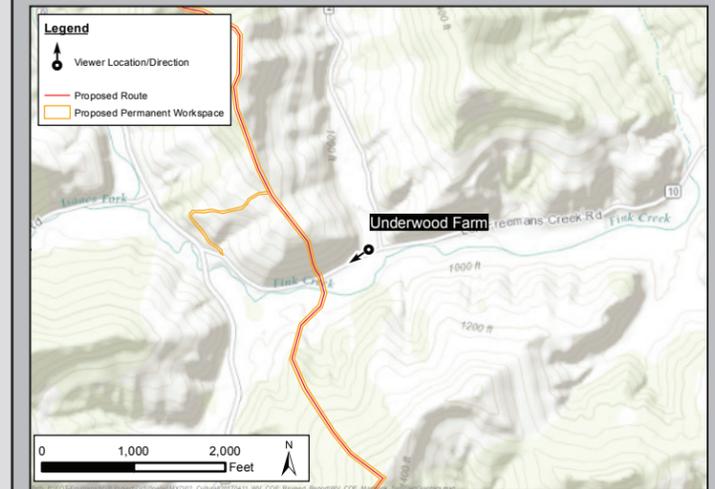
The above image shows the expected construction impacts resulting from clearing vegetation and ground cover along the 50-foot-wide pipeline right-of-way. The white arrows indicate where the pipeline right-of-way would be located.



Post-Construction/Revegetation

The above image shows the expected post-construction condition resulting from revegetation of the 50-foot-wide pipeline right-of-way.

Rating for Underwood Farmstead Photo Simulation: Dominant



Photograph Information

Time of photograph: 12:52 PM
 Date of photograph: 4.13.2017
 Weather condition: Overcast
 Viewing direction: Southwest
 Latitude: 39° 5' 45.78" N
 Longitude: 80° 34' 59.20" W
 Photo Location: The photo was taken from along CR 10/Freemans Creek Road, approximately 0.3 mile east of CR 9/Churchville Road, and approximately 0.35 mile southwest of Churchville, West Virginia.

Mountain Valley Pipeline Project

Underwood Farmstead
 Lewis County, West Virginia



ATTACHMENT 2
CORRESPONDENCE



TELEPHONE / PERSONAL CONVERSATION REPORT

| | |
|---------------------------|---|
| PROJECT NAME: | Mountain Valley Pipeline |
| MVP TEAM CALLER: | Megan Neylon |
| CONVERSATION WITH: | Underwood Farmstead |
| AGENCY: | N/A |
| EMAIL ADDRESS: | N/A |
| PHONE NUMBER: | 304-269-4408 |
| SUBJECT: | Mitigation for Impacts identified in the WVCOE Letter |
| DATE AND TIME: | See below |

SUMMARY OF CONVERSATION:

08/14/17 5:15 PM Spoke to Amber Shackleford. She requested my name and number and would have her husband call me back.

8/14/17 9:30 PM Voicemail left with Megan Neylon to call Jesse Shackleford back.

8/15/17 8:08 AM Megan Neylon returned Mr. Shackleford's call and left a voicemail.

8/15/17 8:27 AM Call scheduled with Mr. Shackleford at 8 PM Wednesday 8/16/17. Call 304-269-4408

8/16/17 8:00 PM Call with Mr. Shackleford. Megan explained the situation and why Mountain Valley was calling. Evelyn Tidlow and Hannah Dye explained the survey process, consultation process with the WVDCH, and our proposed mitigation strategies. They included, a national register nomination (Mr. Shackleford stated that he is willing to let us into the house to do this), a through documentation of the history of the property, or maintenance activities. Mr Shackleford explained that one of the barns does need a new roof. Hannah

8/23/17 7:46 AM – Called Mr. Shackleford and left a message to please return my call.

8/23/17 12:35 PM – Mr. Shackleford returned my phone call and stated that he does not have a preference on the mitigation direction taken by MVP on the Underwood Farm. I suggested that MVP would proceed with preparing the National Register nomination for the Underwood Farm. Mr. Shackleford agreed that would be fine by him.