



COMMONWEALTH of VIRGINIA

Matt Strickler
Secretary of Natural Resources

Department of Historic Resources
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June 21, 2019

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

Re: *Draft Historic American Landscapes Survey, Big Stony Creek Historic District (035-5127)*
Draft National Register of Historic Places Nomination for the Bent Mountain Apple Orchard Rural Historic District (080-5731)
Draft National Register of Historic Places Nomination for the Coles-Terry Rural Historic District (080-5869)
FERC Docket No. CP16-10; DHR File No. 2014-1194

Dear Mr. Friedman,

The Department of Historic Resources (DHR) received the documents referenced above, prepared by SEARCH for Mountain Valley Pipeline, LLC (MPV) in accordance with the *Historic Property Treatment Plan for the Big Stoney Creek Historic District (035-5127)* and the *Revised Historic Property Treatment Plan, Bent Mountain Rural Historic District (080-0322), Bent Mountain Apple Orchard Rural Historic District (080-5731) and Coles-Terry Rural History District (080-5689)*. We offer the following comments on each document. Please see the attached tables for detailed editorial comments.

Draft Historic American Landscapes Survey, Big Stony Creek Historic District (035-5127)
This document appears to meet the HALS guidelines for documentation of historic landscapes.

Draft National Register of Historic Places Nomination for the Bent Mountain Apple Orchard Rural Historic District (080-5731)

This draft is well researched and well written. However, it contains several technical errors that must be corrected if it is to proceed through the nomination process. For example, the summary paragraph in Section 7: Narrative Description lacks a description of the general characteristics of the district and gives no sense of what makes this district a cohesive entity, rather than a collection of inventoried resources. This section also lacks analysis of the district's integrity, which is a central aspect for listing on the National Register of Historic Places.

The authors will need to work with the DHR architectural survey manager to rectify anomalies in the VCRIS records for this district. In the provided inventory, only a few entries have been assigned district (tertiary) ID numbers, e.g., 080-5677-0002. VCRIS has only nine resources under the main ID 080-5677: the series -0001 through -0009. Of these, only -0002, -0006, and -0008 appear in the nomination. DHR has no digital photos

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with the tertiary site numbers except for 0004 thru 0008, and the VCRIS records have no “other” site numbers.

The research in Section 8: Statement of Significance is thorough and well-written. It provides compelling evidence that the district played a significant role in the evolution of Virginia’s agricultural practices in the late nineteenth and twentieth centuries.

Draft National Register of Historic Places Nomination for the Coles-Terry Rural Historic District (080-5869)

The additional research included in this draft does much to differentiate it from the neighboring Bent Mountain Apple Orchard Rural Historic District, and provides the necessary evidence that this district is uniquely significant.

This draft contains several technical errors that must be corrected if the district is to proceed through the nomination process. Section 7: Narrative Description relies on a heavily detailed inventory, rather than offering an analysis of the district’s integrity or any explanation of what makes the district a cohesive whole. The current resource counts (p. 3) include only a fraction of the resources in the inventory, some of which lack VCRIS inventory numbers.

The authors will need to work with the DHR architectural survey manager to ensure that all recorded resources within the district have appropriate VCRIS inventory numbers, including district (tertiary) numbers. At present, VCRIS includes no resources under the main ID 080-5689.

The boundaries for this district should be refined. At present, the district extends into neighboring Montgomery County without offering any justification for doing so. While the author’s desire to avoid splitting parcels, as would have happened with the boundary proposed in the Preliminary Information Form, is appreciated, the current boundary is overly expansive.

We appreciate SEARCH’s efforts to incorporate our previous comments into these drafts and look forward to receiving the second drafts, as indicated in the *Management Summary, Work Plan, and Schedule for the Bent Mountain (080-5677), Bent Mountain Apple Orchard (080-5731), and Coles-Terry (080-5689) Rural Historic Districts* (March 2018).

Thank you for the opportunity to review these documents. Should you have any questions at this time, please do not hesitate to contact me at roger.kirchen@dhr.virginia.gov.

Sincerely,

Roger W. Kirchen, Director
Review and Compliance Division

- c. Ms. Megan Neylon, Equitrans Midstream
Ms. Evelyn Tidlow, GIA Consulting
Mr. Travis Fulk, SEARCH

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Draft Historic American Landscapes Survey, Big Stony Creek Historic District (035-5127)

Page	Comment
5	Should the date “1856” be “1956, since the oldest grave in the cemetery dates to 1898 and the wall on which it is inscribed is concrete block?
8-9	Would it be possible to incorporate more detailed information on the indigenous peoples prior to and during the seventeenth and early eighteenth centuries? The present narrative privileges European-American settlement, which touches on Native American history only during moments of conflict.

**Draft National Register of Historic Places Nomination for the Bent Mountain Apple Orchard
Rural Historic District (080-5731)**

Page	Comment
	Please submit final drafts in Word format for Survey & Register staff.
1	Location: Leave "City or town" blank, as Bent Mountain is neither.
1	State/Federal Agency Certification: Check applicable criteria.
2	Number of Resources within Property: All resources should be included in this count, which currently only includes ones with asterisks.
4	Summary Paragraph: The summary paragraph should provide information about the historic district's physical characteristics, including total acreage and district boundary descriptions, as well as the information requested in the instructions.
4	Summary Paragraph: Remove the word "stately" from the first paragraph, as the houses are largely humble and unassuming, rather than stately.
5	Inventory of Resources and Justification: An architectural analysis of the entire district is required, with the intention of explaining how the district is a distinguishable entity and its integrity as a whole. All seven aspects of integrity should be addressed. The descriptions of individual resources can be adapted to flesh out the description of the district as a whole, or to highlight a particular landscape aspect important to the district's integrity. Include a brief explanation of how resources are keyed to the Sketch Map. It appears to be by the VDHR ID number; however, that number is not shown for every resource in the inventory. Counted resources must have a VDHR number (or be a secondary resource on a property with a VDHR number).
5-14	Inventory of Resources: DHR requires using the VCRIS-generated inventory report. The inventory report automatically includes the property address, date of construction, architectural style (if applicable), resource type, and count of resources (i.e., multiple sheds). Using a VCRIS-generated report further assures that the nomination inventory matches the VCRIS records for properties within the district exactly. Before generating the report, VCRIS users can choose if they want to include the narrative description for each primary resource or not. DHR does not require inclusion of these descriptions, because the crux of an HD description is focused on the overall characteristics of the district. However, those descriptions of individual resources can be used to flesh out the district description, such as by providing an example of a particular resource type or architectural style. Each counted resource should have a VDHR inventory number. If it is a countable resource, that means it had to have been surveyed, which means it has to have a VCRIS record. If it is a physical attribute, such as a group of farm fields, a body of water, or a road, that is not surveyable in the usual sense, then that resource should be described as part of the district's setting, not included in the inventory.
5	Inventory of Resources: Four recorded archaeological sites are within the district boundaries. These should be included in the inventory and addressed as contributing or non-contributing. Inclusion of these sites does not warrant consideration of Significance under Criterion D.
5	Conner Cemetery: Remove the phrase "Typical of rural cemeteries" which is not applicable.
8	Les Landes House: "Central Passage" should not be capitalized.

Page	Comment
12	Edith and Bill Hale House: "Vernacular" should not be capitalized.
16	Significant Dates: This section should not be left blank. The dates 1870 and 1969 should be entered.
16	Architect/Builder: This section should not be left blank. "Unknown" should be entered in there are no documented architects or builders known.
17	Statement of Significance Summary Paragraph: Move the discussion of period of significance, level of significance, etc., from the Narrative Description Summary Paragraph to this paragraph. The detailed explanation of how the district meets Dolan's subcategories should be moved down to the beginning of the narrative statement of significance, and headed "Criterion A: Agriculture." The historic overview then nicely supports the explanation of the district's agricultural significance.
17	Statement of Significance Summary Paragraph: Ending the period of significance in 1969 is not well justified or explained. It reads as if the whole apple industry suddenly died in 1969, which just happens to be 50 years ago.
20	<i>The Rise of Orchards</i> : replace "in the Confederacy" with "in the Confederate States' military."
24	Paragraph beginning "Roanoke County apple...": Move this paragraph to the end of the <i>Apples in the Early Twentieth Century</i> subsection to improve the chronology of the narrative.
28	Major Bibliographical References: Strong use of a mix of primary and secondary sources.
30	Primary location of additional date: Name the local government and university repositories.
31	Latitude/Longitude Coordinate: NPS now requires use of latitude/longitude coordinates instead of UTM coordinates.
40	Figure 4: Convert UTM coordinates to latitude/longitude.

Draft National Register of Historic Places Nomination for the Coles-Terry Rural Historic District (080-5869)

Page	Comment
	Please submit final drafts in Word format for Survey & Register staff.
1	Location: Leave "City or town" blank, as Bent Mountain is neither.
1	State/Federal Agency Certification: Check applicable criteria.
3	Number of Resources within Property: All resources should be included in this count, which currently only ones with asterisks.
4	Summary Paragraph: The summary paragraph should provide information about the historic district's physical characteristics, including total acreage, as well as the information requested in the instructions. Information regarding criteria and period of significance should be moved to the summary paragraph of Section 8: Statement of Significance.
5	Inventory of Resources and Justification: An architectural analysis of the entire district is required, with the intention of explaining how the district is a distinguishable entity and its integrity as a whole. All seven aspects of integrity should be addressed. The descriptions of individual resources can be adapted to flesh out the description of the district as a whole, or to highlight a particular landscape aspect important to the district's integrity. Include a brief explanation of how resources are keyed to the Sketch Map. It appears to be by the VDHR ID number; however, that number is not shown for every resource in the inventory. Counted resources must have a VDHR number (or be a secondary resource on a property with a VDHR number).
5-12	Inventory of Resources: DHR requires using the VCRIS-generated inventory report. The inventory report automatically includes the property address, date of construction, architectural style (if applicable), resource type, and count of resources (i.e., multiple sheds). Using a VCRIS-generated report further assures that the nomination inventory matches the VCRIS records for properties within the district exactly. Before generating the report, VCRIS users can choose if they want to include the narrative description for each primary resource or not. DHR does not require inclusion of these descriptions, because the crux of an HD description is focused on the overall characteristics of the district. However, those descriptions of individual resources can be used to flesh out the district description, such as by providing an example of a particular resource type or architectural style. Each counted resource should have a VDHR inventory number. If it is a countable resource, that means it had to have been surveyed, which means it has to have a VCRIS record. If it is a physical attribute, such as a group of farm fields, a body of water, or a road, that is not surveyable in the usual sense, then that resource should be described as part of the district's setting, not included in the inventory. Inventory numbers appear in the inventory headings and do not need to be repeated in the inventory entry.
5	Inventory of Resources: Recorded archaeological sites within the district boundaries should be included in the inventory and addressed as contributing or non-contributing. Inclusion of these sites does not warrant consideration of Significance under Criterion D.
5	Fire Tower: Change to contributing.

Page	Comment
6	Elijah Henry House: "Vernacular" should not be capitalized.
7	House, 8566 Poor Mountain Road: "Vernacular" should not be capitalized.
8	Janet Wynot House/Terry Place/Terry-Coles Cemetery: "Vernacular" should not be capitalized.
10	Grace Terry Moncure Farm: The inventory entry for this resource is incomplete, as it does not include a contributing log barn (c. 1875) and a contributing stone wall. While the property was not accessible to the authors for survey, these resources are included in the Preliminary Information Form (PIF), which they authors cited, and photos can be obtained from the DHR archives. "Vernacular" should not be capitalized.
12	Farmstead/Baker House/Terry Barns: "Vernacular" should not be capitalized.
14	Significant Dates: This section should not be left blank. The dates 1835 and 1969 should be entered.
14	Architect/Builder: This section should not be left blank. "Unknown" should be entered in there are no documented architects or builders known.
15	Statement of Significance Summary Paragraph: Neither the beginning nor ending period of significance dates are justified in the nomination summary. It cannot begin in 1835 with the purchase of 15,000 acres of land by John Dabney Coles unless there is an extant contributing resource dating to that 1835. It would be justifiable to begin ca. 1840 with the construction of the Elijah Henry House. The ending date of 1969 suggests the whole apple industry suddenly died completely in 1969, which just happens to be 50 years ago.
15	Statement of Significance Summary Paragraph: The detailed explanation of how the district meets Dolan's subcategories should be moved down to the beginning of the narrative statement of significance, and headed "Criterion A: Agriculture." The historic overview then nicely supports the explanation of the district's agricultural significance. "Vernacular" should not be capitalized.
15	Paragraph beginning "The period of significance...": Move this to the end of the first paragraph of this section.
16	Significant Dates: this section should not be left blank. The period of significance dates should be entered.
16	<i>Early Inhabitants of the Bent Mountain Area:</i> Use more recent research on the territories inhabited by various Virginia tribes.
17	Paragraph beginning "The Lewis family...": Change "area of Botetourt County" to "area of then-Botetourt County." Clarify the date at which Botetourt County was formed from Augusta County.
19	Period of significance says Coles acquired land in 1835; this says 1846. Please clarify.
42	Major Bibliographical References: Strong use of a mix of primary and secondary sources.
48	Primary location of additional date: Name the local government and university repositories.
49	Latitude/Longitude Coordinate: NPS now requires use of latitude/longitude coordinates instead of UTM coordinates.

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Page	Comment
49	Boundary Justification: The current boundary extends into neighboring Montgomery County and should be refined. The desire to avoid splitting parcels is appreciated.
58	Figure 4: Convert UTM coordinates to latitude/longitude.
61	The inclusion of a list of properties that could not be accessed is appreciated.
62	Section 9: Photos: Supplement current selection with those from DHR's archives for inaccessible resources.