

November 19, 2019

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

**Subject: Mountain Valley Pipeline Project
Response to Comments by Blue Ridge Environmental Defense League
(October 1, 2019) (FERC Docket Accession #20191001-5139)
REVISED Final National Register of Historic Places Nomination for the
Coles-Terry Rural Historic District (080-5689)
FERC Docket No. CP16-10, DHR File #2014 1194**

Dear Mr. Friedman:

Mountain Valley Pipeline LLC (Mountain Valley) has reviewed Blue Ridge Environmental Defense League's (BREDL) comments submitted October 1, 2019 (FERC Docket Accession #20191001-5139). For reference, Mountain Valley is providing the latest revised version of the National Register (NR) nomination for the Coles-Terry Rural Historic District (RHD) as an attachment to this letter. To address specific concerns outlined in the BREDL's comments, Mountain Valley provides the following responses:

- 1. Modify the NR nomination for the Coles-Terry Rural Historic District prepared by SEARCH to include a network of fire roads and fire trails as historically significant landscape features associated with the fire tower, a contributing resource inside the Coles-Terry Rural Historic District.**

Mountain Valley has included, within the NR nomination for the RHD, the network of fire roads associated with the fire tower (DHR ID #: 080-5689-0007; see enclosed documentation). The network of fire roads is included as a secondary resource to the fire tower, which is a primary contributing resource to the RHD.

- 2. Correct the map of the Coles-Terry RHD currently appearing in the NR nomination so that it no longer mislabels a historic cobbled jeep road connecting to the fire tower as "Honeysuckle Rd."**

It is unclear to which map the BREDL is referring; however, none of the maps included in the NR nomination for the Coles-Terry RHD label the historic cobbled jeep road connecting to the fire tower (see enclosed documentation). In the "Inventory of Resources and Justification" (Section 7 of the NR nomination), an address of 8744 Honeysuckle Road is provided for the fire tower, which is consistent with Roanoke County tax parcel maps for the parcel containing the fire tower (Tax Parcel ID: 093.00-01-46.00-0000).

3. Add two small-scale but historically significant elements to the NR nomination of the Coles-Terry RHD.

The BREDL recommends including a USGS benchmark and a steel road sign in the NR nomination. These elements are included as landscape features in the NR nomination (see enclosed documentation).

4. Modify the NR nomination to state that the Coles-Terry Rural Historic District is significant under National Register Criteria A, B, and C, and include additional areas of significance.

The Virginia Department of Historical Resources (DHR) provided comments on the draft NR nomination in a letter dated June 21, 2019, and concurred that the RHD is significant under Criterion A in the area of Agriculture. Further, DHR did not recommend any additional NRHP criteria that may be applicable to the RHD.

Criterion A

The BREDL suggests that the Coles-Terry RHD is significant under NR Criterion A for its association with events that have made significant contributions to the broad patterns of the history of Bent Mountain, Virginia, and the United States through exploration, settlement, farming, warfare, logging, and horticulture. Residents of the RHD undertook a multitude of agricultural pursuits, from raising swine and livestock to cultivating cabbage and other vegetables, that in addition to tobacco broadened the agricultural picture. None of these pursuits, however, had the impact on local history that apples did.

Currently, the NR Nomination recommends the Coles-Terry RHD as significant under Criterion A for Agriculture. As stated in the NR nomination the history of apple cultivation contributes to the RHD's significance under Criterion A (see enclosed documentation). Additional areas of significance suggested by the BREDL are addressed in following sections of this letter.

Criterion B

The BREDL suggests that the Coles-Terry RHD is significant under NR Criterion B for its association with the Coles and Terry families and their involvement in the Civil War. The information provided by the BREDL and information found during the development of the historic context for the RHD suggest that these individuals' contributions were noteworthy but not unique or significant to broad patterns of history. The involvement of members of the Coles and Terry families in the Civil War does not render the RHD significant under Criterion B.

Criterion C

The BREDL suggests that the Coles-Terry RHD is significant under NR Criterion C for the "architectural techniques and interior finishings" of the Grace Terry Moncure Farmhouse

(DHR ID #: 080-5689-0004). The interior of the Grace Terry Moncure Farmhouse may contain notable architectural features; however, the presence of these elements in one primary contributing resource does not imply that the RHD in its entirety is significant under Criterion C. The RHD does not serve as a significant and distinguishable entity representing the distinctive characteristics of early to mid-nineteenth-century through mid-to late-twentieth-century domestic and agricultural architecture. The district does not convey a wide array of distinct styles, types, forms, and periods of construction from its period of significance (1840–1969). The Coles-Terry RHD is not significant under Criterion C.

Additional Areas of Significance

The BREDL suggests including the following areas of significance: agriculture, exploration/settlement, industry, and science. Currently, the NR Nomination recommends the Coles-Terry RHD as significant under Criterion A for Agriculture.

According to the *National Register Bulletin 16a: How to Complete the National Register Nomination Form* (National Parks Service 1997), for a property to be significant in the area of exploration/settlement, it should be associated with the investigation of unknown or little-known regions, or the establishment and earliest development of new settlements or communities. Early settlers moved into the Bent Mountain area by the mid-eighteenth century. Alexander Ingraham and John Mills were early Bent Mountain settlers who acquired tracts ca. 1753. After the French and Indian War (1754–1763), newcomers flowed into the area from in southern Augusta County and the isolated settlements of earlier years evolved into family farms. Commercial establishments such as taverns and inns then appeared. The history of the Coles and Terry families within the RHD begins in 1846 and does not represent the investigation of unknown or little-known regions, or the establishment and earliest development of new settlements or communities. The RHD is not significant in the area of exploration/settlement.

According to the *National Register Bulletin 16a*, for a property to be significant in the area of industry, it should be associated with the technology and process of managing materials, labor, and equipment to produce goods and services. A sawmill was once located on the property of the Janet Wynot House (DHR ID #: 080-5689-0002) and was operated by members of the Terry family. However, the sawmill is no longer extant. Background research does not indicate that the sawmill was substantial in size or production. The RHD is not significant in the area of industry.

According to the *National Register Bulletin 16a*, for a property to be significant in the area of science, it should be associated with the systematic study of natural law and phenomena. No information found during background research indicates any significant advancement or understanding of silviculture associated with the apple orchards of the Coles-Terry RHD. The RHD is not significant in the area of science.

Mountain Valley appreciates this opportunity to provide responses to these comments. If additional clarification is needed or you have questions, you may contact Ms. Evelyn Tidlow, GAI Consultants, by telephone at (612) 812-5478 or by email at E.Tidlow@gaiconsultants.com, or me, Ms. Megan Neylon, Mountain Valley, by telephone at (724) 873-3645 or by email at MNeylon@equitransmidstream.com.

Thank you for your attention.

Sincerely,



Megan E. Neylon
Environmental Permitting Supervisor

Attachment: One (1) hardcopy and one (1) CD with the **National Register of Historic Places (NRHP) Nomination for the Coles-Terry (080-5689) Rural Historic District**

cc: Roger Kirchen, VDHR (with enclosures)
Mike Pulice, VDHR (with enclosures)
Ann Rogers, BREDL (with enclosures)
Grace Terry, CAPP (with enclosures)
Richard Caywood, County of Roanoke (with enclosures)
Sonja Ingram, Preservation Virginia (with enclosures)
Ashley Webb, Historical Society of Western Virginia (with enclosures)
Mary Krueger, NPS (with enclosures)
Megan Neylon, Mountain Valley (without enclosures)
Evelyn Tidlow, GAI Consultants (without enclosures)