



January 17, 2018

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

**Subject: Mountain Valley Pipeline Project
Clarification Regarding Proposed Access Road in Vicinity of the Henry-
Waldron Cemetery (DHR ID#080-5690)
DHR File No. 2014-1194
FERC Docket No. CP16-10**

Dear Mr. Kirchen:

Mountain Valley appreciates the comments provided in your letter dated September 21, 2017, regarding *Mountain Valley Pipeline Project, Phase I Survey Supplemental Information and Criteria of Effects Report: Addendum 2, Montgomery and Roanoke Counties, Virginia* (June 2017) and is providing herein clarification in response to those comments related to the access road in the vicinity of the Henry-Waldron Cemetery (DHR ID#080-5690).

In the September 21, 2017, letter, the Virginia Department of Historic Resources (DHR) issued its opinion that the Mountain Valley Pipeline Project will adversely affect the Henry-Waldron Cemetery (DHR ID #080-5690), a historic resource determined eligible for the National Register of Historic Places (NRHP) as a contributing element to the Coles-Terry Rural Historic District (DHR ID #080-5689). The initial avoidance plan developed by Mountain Valley to avoid direct impacts on the cemetery was accepted by the DHR in the September 21, 2017, letter; however, the DHR stated that “construction of the new roadway and permanent workspace so close to the cemetery is inconsistent with its rural character and will greatly alter the property’s setting and feeling” and, as a result, require treatment.

Mountain Valley proposes to utilize an existing 8-foot-wide dirt road running along the northwestern boundary of the Henry-Waldron Cemetery (DHR ID#080-5690) to create a permanent 8-foot-wide access road surfaced with gravel. Mountain Valley does not intend to construct a “new roadway” as indicated in DHR’s letter.

The original avoidance plan proposed temporary limits-of-disturbance (LOD) for the access road immediately adjacent to the cemetery (within zero feet of the cemetery’s edge). In the original plan, the installation of protective fencing was proposed for the period of construction along the edge of the LOD to prevent inadvertent impacts on the cemetery.

To further minimize impacts on the cemetery, Mountain Valley proposes to narrow the LOD to provide an approximately 11-foot-wide buffer between the cemetery and the LOD. This will be accomplished by reducing the access road LOD from the standard 50 feet to 25 feet in width while passing the cemetery to avoid direct impacts (the road will not cross the Henry-Waldron Cemetery's historic property boundary) and to minimize indirect impacts (Attachment 1). Furthermore, protective fencing will be installed along the cemetery's northeastern boundary along the access road LOD. The southwestern edge of the road will be constructed at least 11 feet from the Henry-Waldron Cemetery's historic property boundary. Following construction, the road width will be reduced to 8 feet and the permanent road will follow the route of the extant historic-era dirt road. Access to the cemetery will be maintained during construction.

Mountain Valley proposes using existing roads as much as possible since this minimizes impacts on vegetation by reducing trampling, compaction, land use change, tree clearing, and stump removal activities. While the graveled access road adjacent to the cemetery will remain post-construction, as noted above, it will be reduced from 25 feet to 8 feet in width (Attachment 2). Areas beyond the permanent road limits, disturbed during construction, will be restored to their original grades, condition and use or better, to the greatest extent practicable, in accordance with Project Specific Standards and Specifications approved by the Virginia Department of Environmental Quality (DEQ). Cleared vegetation will be restored using DEQ-approved native seed mixes and native vegetation will be allowed to regrow in the restored areas.

In general, Mountain Valley has proposed use of existing roads rather than construction of new roads where feasible to avoid creating additional impacts on cultural and natural resources. In terms of cultural resources, this approach not only minimizes direct effects to archaeological and aboveground historic resources but also reduces impacts on viewsheds and the surrounding landscape which, in some cases, play a role in how historic resources convey their historic significance. Mountain Valley's approach recognizes that this is particularly the case within rural historic districts and landscapes where both formal and informal historic-era transportation networks provide historic context and serve as contributing elements. In this particular case, Mountain Valley's use of an existing road avoids permanent direct and indirect (viewshed) impacts on contributing aboveground historic resources such as the Henry-Waldron Cemetery (DHR ID#080-5690) and Elijah Henry House (DHR ID#080-5297), and in turn, on the Coles-Terry Rural Historic District (DHR ID #080-5689).

Please review this plan under Stipulation IV.A. in the executed Programmatic Agreement for the Project. This report will also be filed with the Federal Energy Regulatory Commission (FERC), lead federal agency for the project. Per Stipulation IV.E., comments should be submitted to Paul Friedman at the FERC. He can be reached at:

Mr. Kirchen
January 17, 2018
Page 3

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

(202)502-8059
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You may contact Evelyn Tidlow by telephone at (612) 812-5478 or by e-mail at e.tidlow@gaiconsultants.com if you have questions or require additional technical information during your review.

Thank you for your attention.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Clauto", is centered below the text "Sincerely,".

Brian Clauto
Senior Environmental Coordinator

cc: Grace Terry
Sean Sparks (Tetra Tech)
Sydne Marshall (Tetra Tech)
Evelyn Tidlow (GAI)

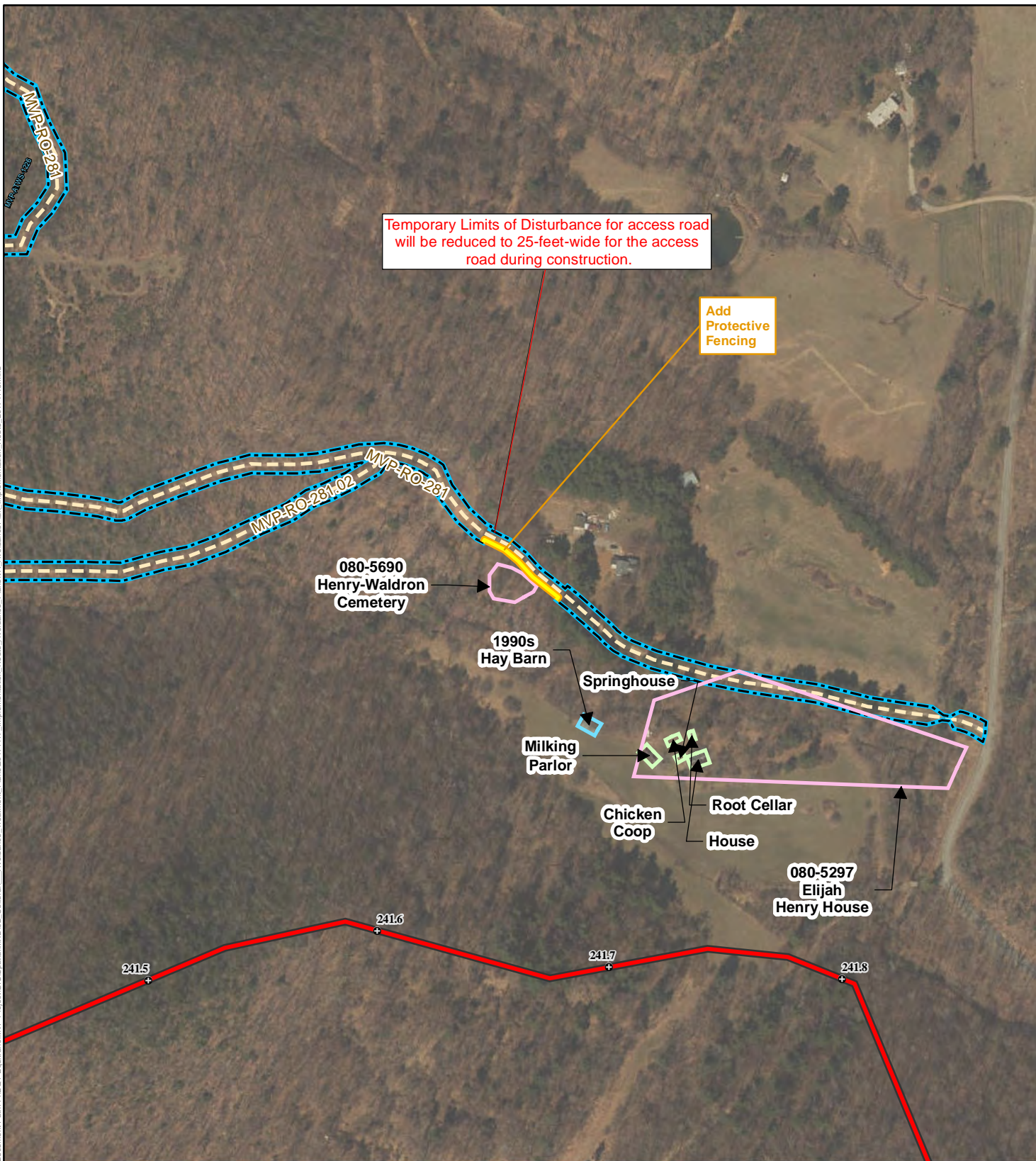


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ATTACHMENT 1

Henry-Waldron Cemetery (DHR ID#080-5690) Avoidance Plan

Document Path: P:\EOT\Equitrace\MVP_Project\GIS\State\MXD\02_Cultural_Avoidance_Treatment_Plan\20171117_Implementation_Route_Avoidance_Plan\VA_AvoidancePlan_Implementation_Route_20171115.mxd



Mountain Valley Pipeline Project		NAD 1983 UTM 17N	0 125 250 500 Feet
<p>Attachment 1 Revised Avoidance Plan for Henry-Waldron Cemetery (080-5690) Roanoke County, VA</p> <p>DECEMBER 2017</p> <p>Data Sources: USGS, ESRI, Open Street Map.</p>	<p>Legend</p> <ul style="list-style-type: none"> Historic Property Boundary Historic Structure Modern Structure Protective Fencing Construction Limits of Disturbance Milepost Proposed Pipeline Route Proposed Access Road 		







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ATTACHMENT 2

Henry-Waldron Cemetery Post-Construction Conditions

Document Path: P:\EOT-Equitrans\MVP-Project\GIS\Special\MXD02_Cultural\2017\211_Henry_Waldron_Cemetery_Treatment_Plan\Attachment_5_Henry_Waldron_Cemetery_Post_Construction.mxd



Mountain Valley Pipeline Project		NAD 1983 UTM 17N		0 30 60 120 Feet	
 <p>Attachment 2 Henry-Waldron Cemetery Post-Construction Conditions Roanoke County, VA</p> <p>DECEMBER 2017</p>	Legend  Proposed Access Road  Historic Property Boundary				
	Data Sources: USGS, ESRI, Open Street Map.				