



COMMONWEALTH of VIRGINIA

Matt Strickler
Secretary of Natural Resources

Department of Historic Resources
2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
www.dhr.virginia.gov

March 8, 2018

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

Re: *Mountain Valley Pipeline Project, 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 Historic District (080-5689)*
FERC Docket No. CP16-10-000; DHR File No. 2014-1194

Dear Mr. Friedman:

The Department of Historic Resources (DHR) has received the document referenced above (revised February 2018) prepared by Tetra Tech for Mountain Valley Pipeline, LLC (MVP) and the Federal Energy Regulatory Commission (FERC) in accordance with Stipulation III.B of the Programmatic Agreement (PA) executed for this project. This Treatment Plan presents those actions to be taken by MVP to minimize and mitigate the adverse effects of the project on the Bent Mountain Rural Historic District (DHR ID #080-0322), Bent Mountain Apple Orchard Rural Historic District (DHR ID #080-5731), and Coles-Terry Rural Historic District (DHR ID #080-5689) in Roanoke County, Virginia. Specifically, the Treatment Plan proposes 1.8 miles of enhanced right-of-way revegetation, National Register of Historic Places nominations for the Bent Mountain Apple Orchard Rural Historic District and Coles-Terry Rural Historic District, a Preliminary Information Form for the Bent Mountain Rural Historic District, and \$500,000 for the maintenance and repair of the Bent Mountain Elementary School.

It is our opinion that the revised Treatment Plan is reasonable in scale, proportionate to the effect, and takes into consideration previous comments from DHR, the Advisory Council on Historic Preservation, and other consulting parties. We ask that MVP provide to DHR a letter of intent from Roanoke County that reflects their willingness to accept the mitigation funds and requisite terms and conditions for improvements to the school. Further, the *Clarification Regarding Proposed Access Road in Vicinity of the Henry-Waldron Cemetery (DHR ID #080-5690)*, dated January 17, 2018, shows that the cemetery will be avoided and protected during the construction, use, and restoration of access road MVP-RO-281; however, we recommend that all efforts be taken to increase the 11-foot buffer between the cemetery and access road by shifting the limits of disturbance completely to the north side of the existing dirt path. Extensive comments on the Treatment Plan have been provided to MVP and the FERC from consulting parties and other

Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5443
Fax: (540) 387-5446

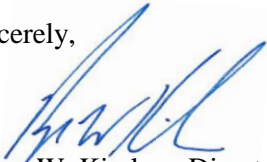
Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033

Eastern Region Office
2801 Kensington Avenue
Richmond, VA 23221
Tel: (804) 367-2323
Fax: (804) 367-2391

stakeholders. We remind the FERC of its responsibility under the PA to meaningfully consider all comments from consulting parties prior to approving any final Treatment Plan.

It should be noted that the Treatment Plan, including the Table of Contents and Figures, regularly references Section 4.3 of the plan, but this section does not exist. The plan should be amended to correct this error. Should you have any questions concerning these comments, please do not hesitate to contact me at roger.kirchen@dhr.virginia.gov.

Sincerely,



Roger W. Kirchen, Director
Review and Compliance Division

- c. Mr. John Eddins, ACHP
Mr. John Centofanti, MVP