



United States Department of the Interior

NATIONAL PARK SERVICE
Blue Ridge Parkway
199 Hemphill Knob Road
Asheville, North Carolina 28803



IN REPLY REFER

H30
PIN 67207

August 25, 2017

Ms. Julie Langan
Department of Historic Resources Director & State Historic Preservation Officer
DHR Headquarters, Richmond Central Office
2801 Kensington Avenue
Richmond, VA 23221

**RE: Section 106 Consultation for Granting Permits for the Mountain Valley Pipeline Crossing Blue Ridge Parkway (ROW Permit 5:140:1947, Construction Permit 2017.139)
DHR File No. 2016-0936 and 204-1194**

Thank you for your letter of August 14, 2017 in consultation regarding the proposed Mountain Valley Pipeline project. We are writing to address your comments, specifically regarding the indirect area of potential effects (APE), and deficiencies in the archeological reports submitted. We will also take this opportunity to share the right-of-way permit for the project.

In light of your comments we have re-drawn the indirect APE map to better reflect the potential effects of the undertaking. The attached updated indirect APE map identifies 1) areas within Blue Ridge Parkway lands from which the pipeline corridor or the project's components may be visible; and 2) areas outside of the Parkway boundary from which impacts on Parkway lands may be visible.

The properties discussed below are within the newly defined APE, and impacts to these properties were not addressed in our previous letter. For each property we have included a description of the property, an evaluation of its eligibility for the National Register of Historic Places, and a determination of effects for the property from the proposed undertaking. The descriptions of the properties are drawn largely from reports prepared by New South Associates, Inc. [the Phase I Reconnaissance Architectural Survey for the Mountain Valley Pipeline Roanoke County (March 2016), and the Addendum to the Phase I Reconnaissance Architectural Survey for the Mountain Valley Pipeline: Summary Report (March 2017)].

Additional information was gleaned from the Virginia Cultural Resource Information System (V-CRIS) managed by the Virginia Department of Historic Resources.

As with properties discussed in our July 13, 2017 letter, properties for which sufficient research has not been conducted to complete a determination of eligibility will be treated as eligible for the National Register of Historic Places or contributing to the potentially eligible Bent Mountain Rural Historic District. This provides a high level of protection for the property, and is more expedient.

Potential Historic Properties within the APE

VDHR # 033-0185 House & Outbuildings

Description:

“This house with outbuildings is located on a 233-acre parcel on the north side of Callaway Road, less than one-half mile east of the Roanoke County line. The house faces south and is bordered on the north by a wooded hillside and on the south by a large lawn with a pond.”

“This resource is a circa 1890 I-house with a side-gable asphalt shingle roof, a vinyl or aluminum exterior, and a continuous brick foundation. It has a three-bay façade and central entrance with side and transom lights covered by a one story partial-width shed entrance porch. The house has original double hung two-over-two wood sash windows and two exterior end, shouldered brick chimneys. There is a two-light front gable dormer on the roof. Outbuildings include a wood frame garage with a metal shed roof and a second smaller concrete block shed with a metal gable roof.”

“The installation of vinyl siding and windows has eroded the integrity of the dwelling. The outbuildings are not significant examples of any particular outbuilding type or building technique. Due to the lack of integrity of the primary resource and the lack of distinction among the outbuildings, the resource is recommended not eligible for the NRHP under Criteria A, B, or C.” (V-CRIS, 8-2016)

Eligibility:

This property was determined not eligible by VDHR staff in 2016. The NPS believes this determination is still accurate.

Effects:

This property is not eligible for the National Register. Therefore, the proposed undertaking would not affect historic properties at this location.

VDHR # 080-0487 19th Century Residence

Description:

“Located on the west side of Bent Mountain Road is a 10.5-acre parcel that contains this circa 1850 brick Federal style house. There is also a garage and a large barn in an agricultural field to the south. The house is approached by a circular driveway and is surrounded by woods. The house has a side-gable metal roof and a brick exterior. A one-story partial width front porch shelters a central entrance with sidelights and a transom. The windows are original double-hung six-over-six sashes. A two-story, weatherboard, gable roof ell projects from the rear elevation. The house has a side-gable metal roof and a brick exterior. A one-story partial width front porch shelters a central entrance with sidelights and a transom. The windows are original double-hung six-over-six sashes. A two-story, weatherboard, gable roof ell projects from the rear elevation.” (Phase I Architectural Survey for Roanoke County (2016), p. 44)

“Current photos of the house interior, provided by the owner, reveal woodwork consistent with the c. 1870 period and a high level of integrity overall. Therefore, as an excellent and locally rare example of a post-Civil War Flemish-bond brick house, it is recommended eligible under Criterion C in the area of Architecture.” (V-CRIS. 8-2016)

Eligibility:

Based on research conducted during the Phase I architectural study, and information in the V-CRIS database Blue Ridge Parkway staff finds the property potentially eligible for the National Register. The property will be treated as eligible for the sake of 106 consultation on this project.

Effects:

The property is not in the direct effects APE for the project and would not be directly impacted by pipeline construction. Based on images taken from the area toward Blue Ridge Parkway property Parkway staff concluded there is no view from the property of the undertaking on Blue Ridge Parkway land. Potential impacts to the property include increased traffic and possibly some temporary construction related noise. These impacts would be short-term during the duration of the construction. The National Park Service finds the undertaking would have no adverse effect on the property.

VDHR # 080-0496 Store/Service Station

“This circa 1920 vacant country store faces west on the east side of Bent Mountain Road. An associated house (080-5661) is situated south of the store. This one-story building has a metal front-gable roof, weatherboard exterior, and a continuous poured concrete foundation. The main section of the building has a gable front porch with square wood posts, and a central half-light entrance door flanked by two double-hung one-over-one wood windows. There is an interior central concrete block chimney. North of the main

gables section is a series of shed roofed additions containing two garage bays with one sliding door and one set of hinged garage doors.

This store is a well-preserved example of an early twentieth-century roadside store or service station that retains good integrity. New South Associates recommends further research and an intensive survey in order to make a NRHP eligibility determination for this property.” (Phase I Architectural Survey for Roanoke County (2016), p. 54)

Eligibility:

Phase I architectural study concluded this property is “potentially individually eligible for the NRHP” (Phase I p. i) and that Phase II study should be conducted to determine eligibility. Phase II research has not been conducted on the resource at this time. For the purpose of consultation the property will be considered National Register eligible. A determination of eligibility should be made when additional research is concluded.

Effects:

The property is not in the direct effects APE for the project and would not be directly impacted by pipeline construction. Based on images taken from the area toward Blue Ridge Parkway property Parkway staff concluded there may be temporary views of the tops of the construction cranes and side booms during portions of the construction process on the Parkway. Potential impacts to the property include increased traffic and possibly construction related noise. These impacts would be short-term during the duration of the construction. The National Park Service finds the undertaking would have no adverse effect on the property.

VDHR # 080-0497 Late 19th Century Vernacular Farmhouse and concrete block garage

Description:

“This resource is located at the southeast corner of the intersection of Bent Mountain Road and Clover Hill Road on a 0.72-acre parcel. The circa 1895 two-story vernacular house consists of a small four-room front section, a two-story rear ell, and a one-story side wing appended to the east side of the ell. The house has side gable metal roofs, interior brick chimneys, weatherboard siding, and two-over-two double-hung windows in the two-story front section. The bottom portion of the side wing is covered with a metal sheet. Windows of the ell were not observed; the windows of the side wing appear to be four-over-four and one over- one sashes. A full-width, single-story front porch has a metal shed roof and protects an offset front entrance serving what may be a hall-parlor floor plan. East of the dwelling is a detached frame and concrete block garage positioned with its gable end to Clover Hill Road.

This resource appears to be an unusual example of a late nineteenth-century vernacular farmhouse. New South Associates recommends further research and an intensive survey in order to make a NRHP eligibility determination for this property.” (Phase I Architectural Survey for Roanoke County (2016), p.

Eligibility:

Phase I architectural study concluded this property is “potentially individually eligible for the NRHP” (Phase I p. i) and that Phase II study should be conducted to determine eligibility. Phase II research has not been conducted on the resource at this time. For the purpose of consultation the property will be considered National Register eligible. A determination of eligibility should be made when additional research is concluded.

Effects:

The property is not in the direct effects APE for the project and would not be directly impacted by pipeline construction. Based on images taken from the area toward Blue Ridge Parkway property Parkway staff concluded there may be temporary views of the tops of the construction cranes and side booms during portions of the construction process on the Parkway. Potential impacts to the property include increased traffic and possibly construction related noise. These impacts would be short-term during the duration of the construction. The National Park Service finds the undertaking would have no adverse effect on the property.

VDHR # 080-0498 Turn-of-the-twentieth-century folk Victorian-style House and circa 1950-1975 Barn

Description:

“Located on the west side of Bent Mountain Road, this resource is a circa 1890 two-story Folk Victorian-style house with a hipped asphalt shingle roof with a decorative front gable, a center bay shed porch on square brick posts, and brick exterior end chimneys. The foundation was not visible and the overall massing of the house could not be determined due to tree cover. The exterior appears to be brick veneer. The porch shelters a central entrance flanked by sidelights. The house has been significantly altered with brick veneer, partially enclosed windows, and replacement six-over-six and nine-over-nine sash vinyl windows. The house is bordered on the west by pastures and includes a large horse barn southeast of the house. The circa 1950-1975 rectangular barn has a flared metal gable roof.

The resource is a turn-of-the-twentieth-century Folk Victorian-style house. The house has been extensively altered by the installation of a modern brick veneer exterior and the removal of the original window sashes. Due to these changes the house does not convey a historic time period. Due to the loss of materials integrity, house is recommended not individually eligible for the NRHP under Criteria A, B, or C. Additional study is recommended to determine if the resource may contribute to the potential Bent Mountain Historic District.” (Phase I Architectural Survey for Roanoke County (2016), p. 58)

Eligibility:

Phase II research has not been conducted on the resource at this time to determine if it contributes to the

Bent Mountain Historic District. For the purpose of consultation the property will be considered contributing to the district. A determination of eligibility should be made after additional research is conducted.

Effects:

The property is not in the direct effects APE for the project and would not be directly impacted by pipeline construction. Based on images taken from the area toward Blue Ridge Parkway property Parkway staff concluded there may be temporary views of the tops of the construction cranes and side booms during portions of the construction process on the Parkway. Potential impacts to the property include increased traffic and possibly some construction related noise. These impacts would be short-term during the duration of the construction. The National Park Service finds the undertaking would have no adverse effect on the property.

VDHR # 080-0530 20th Century House

Description:

“Located on the west side of Bent Mountain Road is this 8.8-acre parcel containing an east-facing house, a small frame storage shed west of it and a gabled frame barn with a metal roof and an enclosed side shed north of the house. The house faces an open field on the east side of Bent Mountain Road. The circa-1940 one-story, rectangular dwelling has a front-gable asphalt shingle roof, asbestos siding, a concrete block foundation and a variety of double-hung window configurations. A small shed-roofed porch on square posts is at the southwest corner of the building and a stone exterior chimney is at the northeast corner.

The house is an unremarkable example of a modest mid-twentieth-century dwelling. The house does not embody distinctive characteristics of a type, period or method of construction. It is not known to have associations with events or persons significant in the past. The resource is recommended not individually eligible to the NRHP under Criteria A, B, or C. Additional study is recommended to determine if the resource may contribute to the potential Bent Mountain Historic District.” (Phase I Architectural Survey for Roanoke County (2016), p. 60)

Eligibility:

Phase II research has not been conducted on the resource at this time to determine if it contributes to the Bent Mountain Historic District. For the purpose of consultation the property will be considered as an eligible resource contributing to the district. A determination of eligibility should be made after additional research is conducted.

Effects:

Views from this property could be impacted by the proposed undertaking on Blue Ridge Parkway lands. These impacts include the clearing of an approximately 0.5 acre area of trees along the western boundary

of the Parkway. This area would be replanted with grasses, and would remain clear of trees for the life of the right-of way. This grass field would blend in with the existing adjacent agricultural field once the area revegetates.

Impacts also include the short-term views of construction activities onto Parkway lands, increased traffic from construction related activities, and potential noise during the construction period (approximately one month).

Long-term visual impacts to the view on Parkway land are not substantial, and would not alter characteristics of the historic property in a way that impact it for inclusion on the National Register. The National Park Service concludes this project will have no adverse effect on this property.

VDHR # 080-5655 1963 Ranch House

Description:

“This 1963 Ranch house sits on 0.76-acre parcel on the east side of Bent Mountain Road. The house faces northwest and is surrounded by a grassy lawn with a hill rising gently to the east. The house has a side-gable roof covered with asphalt shingles and a brick exterior with vinyl trim in the gable ends. The foundation is not visible. An offset interior slab chimney projects from the roofline. The windows are horizontal metal sliders and a picture window is placed north of the recessed front entry. A modern prefabricated shed is situated in the northeast corner of the property.

The resource is an example of a popular mid-twentieth-century house type, the Ranch, which is found in great numbers in both rural and urban areas across the state. This particular example lacks distinctive architectural, design, and construction features that sufficiently embody the Ranch style. It is not known to have associations with events or persons significant in the past. The resource is recommended not individually eligible for the NRHP under Criteria A, B, or C. Additional study is recommended to determine if the resource may contribute to the potential Bent Mountain Historic District.” (Phase I Architectural Survey for Roanoke County (2016), p. 63-64)

Eligibility:

Phase II research has not been conducted on the resource at this time to determine if it contributes to the Bent Mountain Historic District. For the purpose of consultation the property will be considered as an eligible resource contributing to the district. A determination of eligibility should be made after additional research is conducted.

Effects:

The property is not in the direct effects APE for the project and would not be directly impacted by pipeline construction. Based on images taken from the area toward Blue Ridge Parkway property Parkway staff concluded there is no view from the property of the undertaking on Blue Ridge Parkway

land.

Potential impacts to the property include increased traffic and possibly construction related noise. These impacts would be short-term during the duration of the construction. The National Park Service finds the undertaking would have no adverse effect on the property.

VDHR # 080-5656 Early to mid-twentieth century Building

Description:

“Located on the west side of Bent Mountain Road is this 8.8-acre parcel containing an east-facing house, a small frame storage shed west of it and a gabled frame barn with a metal roof and an enclosed side shed north of the house. The house faces an open field on the east side of Bent Mountain Road. The circa-1940 one-story, rectangular dwelling has a front-gable asphalt shingle roof, asbestos siding, a concrete block foundation and a variety of double-hung window configurations. A small shed-roofed porch on square posts is at the southwest corner of the building and a stone exterior chimney is at the northeast corner.

The house is an unremarkable example of a modest mid-twentieth-century dwelling. The house does not embody distinctive characteristics of a type, period or method of construction. It is not known to have associations with events or persons significant in the past. The resource is recommended not individually eligible to the NRHP under Criteria A, B, or C. Additional study is recommended to determine if the resource may contribute to the potential Bent Mountain Historic District.” (Phase I Architectural Survey for Roanoke County (2016), p. 60)

Eligibility:

Phase II research has not been conducted on the resource at this time to determine if it contributes to the Bent Mountain Historic District. For the purpose of consultation the property will be considered as an eligible resource contributing to the district. A determination of eligibility should be made after additional research is conducted.

Effects:

Views from this property could be impacted by the proposed undertaking on Blue Ridge Parkway lands. These impacts include the clearing of a 0.5 acre area of trees along the western boundary of the Parkway. This area would be replanted with grasses, and would remain clear of trees for the life of the right-of way. This grass field would blend in with the existing adjacent agricultural field once the area revegetates.

Impacts also include the short-term views of construction activities on Parkway lands, increased traffic from construction related activities, and potential noise during the construction time period (approximately one month).

Long-term visual impacts to the view on Parkway land are not substantial, and would not alter

characteristics of the historic property in a way that impact it for inclusion on the National Register. The National Park Service concludes this project will have no adverse effect on this property.

VDHR # 080-5657 circa 1941 House and garage

Description:

“This circa 1941 house and garage are located on a one-acre parcel on the east side of Bent Mountain Road. A hill east of the house slopes up to a pasture. The one-story dwelling has a metal side-gable roof with clipped end gables, vinyl siding, and a poured concrete foundation. On the west side is a central entrance covered by a gabled entry porch and flanked by two vinyl double-hung replacement windows. There is a rear gable-roof addition on the east elevation, and a small side gabled wing on the north elevation. The one-story, one-bay garage has an asphalt front-gable roof and vinyl siding. In the pasture east of the house are two gabled barns, both painted red and covered in vertical boards. Both have metal roofs and one barn has a foundation of concrete blocks. The other foundation was not visible.

The house is an unremarkable example of a modest mid-twentieth-century dwelling. The house does not embody distinctive characteristics of a type, period or method of construction, and the installation of vinyl siding has obscured or removed the original siding material. The extant outbuildings are not examples of any particular building type or construction technique and are not significant independent of the main dwelling. The buildings as a group do not strongly convey rural or agricultural life and the property is not known to have associations with events or persons significant in the past. For these reasons, the resource is recommended not individually eligible for the NRHP under Criteria A, B, or C. Additional study is recommended to determine if the resource may contribute to the potential Bent Mountain Historic District.” (Phase I Architectural Survey for Roanoke County (2016), p. 64-65)

Eligibility:

Phase II research has not been conducted on the resource at this time to determine if it contributes to the Bent Mountain Historic District. For the purpose of consultation the property will be considered contributing to the district. A determination of eligibility should be made after additional research is conducted.

Effects:

Views from this property could be impacted by the proposed undertaking on Blue Ridge Parkway lands. These impacts include the clearing of a 0.5 acre area of trees. This area would be replanted with grasses, and would remain clear of trees for the life of the right-of way. This grass field would blend in with the existing adjacent agricultural field once the area revegetates.

Impacts also include the short-term views of construction activities on Parkway lands, increased traffic from construction related activities, and potential noise during the construction time period (approximately one month).

Long-term visual impacts to the view on Parkway land are not substantial, and would not alter characteristics of the historic property in a way that impact it for inclusion in the National Register. The National Park Service concludes this project will have no adverse effect on this property.

VDHR # 080-5658 Farm with circa 1920s-1930s dwelling and outbuildings

Description:

“Located on the east side of Bent Mountain Road is this 11.65-acre farm contains a main house and outbuildings surrounded by farm fields to the west and woods to the east. The 1.5-story house displays Tudor Revival influences, which date the house to the 1930s; however, the dimensions and form of the main block suggest it may be an earlier log dwelling. The house faces northwest and has a side-gable metal roof with a decorative front gable and a brick façade chimney. There is an offset projecting entry vestibule with a shed stoop porch. The house has a weatherboard exterior a concrete block foundation. The house has one-over-one double-hung windows throughout, which may be replacements. Outbuildings include a modern one-bay front gable garage with an enclosed side shed and a gable-roof barn with an enclosed side shed, a metal roof and vertical board siding.

The house is an unremarkable example of a 1930s dwelling, which displays restrained Tudor Revival influences in the form of the steeply pitched front gables and the façade chimney. The garage and barn are not significant examples of any particular building type or construction technique and are not architecturally or historically significant independently of the house. The property is not known to have associations with events or persons significant in the past. For these reasons, the resource is recommended not individually eligible for the NRHP under Criteria A, B, or C. Additional study is recommended to determine if the resource may contribute to the potential Bent Mountain Historic District.” (Phase I Architectural Survey for Roanoke County (2016), p. 65)

Eligibility:

Phase II research has not been conducted on the resource at this time to determine if it contributes to the Bent Mountain Historic District. For the purpose of consultation the property will be considered as an eligible resource contributing to the district. A determination of eligibility should be made after additional research is conducted.

Effects:

Views from this property could be impacted by the proposed undertaking on Blue Ridge Parkway lands. These impacts include the clearing of a 0.5 acre area of trees along the western boundary of the Parkway. This area would be replanted with grasses, and would remain clear of trees for the life of the right-of way. This grass field would blend in with the existing adjacent agricultural field once the area revegetates.

Impacts also include the short-term views of construction activities on Parkway lands, increased traffic

from construction related activities, and potential noise during the construction time period (approximately one month).

Long-term visual impacts to the view on Parkway land are not substantial, and would not alter characteristics of the historic property in a way that impact it for inclusion on the National Register. The National Park Service concludes this project will have no adverse effect on this property.

VDHR # 080-5659 Circa 1955 House

“Located on the south side of Clover Hill Road, this circa 1955 one-story U-plan Ranch house features a shallow hipped asphalt shingle roof, brick veneer walls and foundation, and an interior brick slab chimney. Windows are two-over-two horizontal sashes, with a picture window west of the entry. A metal porch roof supported by metal posts shelters the entry and picture window. Bordered by rolling grassy field on all sides, the house sits on a seven-acre parcel with a onebay, front-gable, concrete block garage to the south.

The resource is an example of a popular mid-twentieth-century house type, the Ranch, which is found in great numbers in both rural and urban areas across the state. This particular example lacks distinctive architectural, design, and construction features that sufficiently embody the Ranch style. It is not known to have associations with events or persons significant in the past. The resource is recommended not individually eligible for the NRHP under Criteria A, B, or C. Additional study is recommended to determine if the resource may contribute to the potential Bent Mountain Historic District.” (Phase I Architectural Survey for Roanoke County (2016), p. 65-66)

Eligibility:

Phase II research has not been conducted on the resource at this time to determine if it contributes to the Bent Mountain Historic District. For the purpose of consultation the property will be considered as an eligible resource contributing to the district. A determination of eligibility should be made after additional research is conducted.

Effects:

Views from this property could be impacted by the proposed undertaking on Blue Ridge Parkway lands. These impacts include the clearing of a 0.5 acre area of trees along the western Parkway boundary, and potential additional cleared lands (approximately 1 acre) along the eastern boundary. These areas would be replanted with grasses, and would remain clear of trees for the life of the right-of-way. These grass fields would blend in with existing adjacent agricultural fields once the areas revegetate.

Impacts also include the short-term views of construction activities on Parkway lands, increased traffic from construction related activities, and potential noise during the construction time period (approximately one month).

Long-term visual impacts to the view on Parkway land are not substantial, and would not alter characteristics of the historic property in a way that impact it for inclusion on the National Register. Views from this property are also partially shielded by trees behind the property. Other impacts during the construction period would be short-term.

The National Park Service concludes this project will have no adverse effect on this property.

VDHR # 080-5660 Circa 1930 vernacular house and outbuildings

Description:

“Located on the north side of Clover Hill Road, this circa 1930 1.5-story vernacular house features a steeply pitched side gable metal roof and a variety of siding materials and window types. This resource has been altered with several additions and renovations. The house is also deteriorated and in poor condition. The 1.3-acre wooded parcel has several small sheds.

The house is an unremarkable example of a modest mid-twentieth-century dwelling. The house does not embody distinctive characteristics of a type, period, or method of construction. The house has been altered by the application of a number of modern siding materials. It is not known to have associations with events or persons significant in the past. Due [to] its lack of architectural significance, loss of materials integrity, and poor condition, the resource is recommended not individually eligible to the NRHP under Criteria A, B, or C. Additional study is recommended to determine if the resource may contribute to the potential Bent Mountain Historic District.” (Phase I Architectural Survey for Roanoke County (2016), p. 66)

Eligibility:

Phase II research has not been conducted on the resource at this time to determine if it contributes to the Bent Mountain Historic District. For the purpose of consultation the property will be considered as an eligible resource contributing to the district. A determination of eligibility should be made after additional research is conducted.

Effects:

Views from this property could be impacted by the proposed undertaking on Blue Ridge Parkway lands. These impacts include the clearing of a 0.5 acre area of trees along the western Parkway boundary, and potential additional cleared lands (approximately 1 acre) along the eastern boundary. These areas would be replanted with grasses, and would remain clear of trees for the life of the right-of way. These grass fields would blend in with existing adjacent agricultural fields once the areas revegetate.

Impacts also include the short-term views of construction activities on Parkway lands, increased traffic from construction related activities, and potential noise during the construction time period (approximately one month).

Long-term visual impacts to the view on Parkway land are not substantial, and would not alter characteristics of the historic property in a way that impact it for inclusion on the National Register. Views from this property are also partially shielded by trees behind the property. Other impacts during the construction period would be short-term.

The National Park Service concludes this project will have no adverse effect on this property.

VDHR # 080-5661 Circa 1920 House

Located on the east side of Bent Mountain Road, this circa 1920, 1.5-story Craftsman-style house features a side-gable asphalt shingle roof, front-gable dormer, an interior central brick chimney, and a concrete block foundation. The house has been altered with vinyl siding and modern replacement doors and windows. The full-width inset front porch, supported by tapered wood columns on brick piers, protects an off-center front entrance marked by an arched gable over the porch steps. There are no outbuildings.

The resource is an example of a common early twentieth-century house type, the Craftsman Bungalow. The house has been altered by the installation of modern vinyl siding over the original siding material and the removal of the original window sashes. The dwelling is a heavily altered example of the Craftsman Bungalow style. The house is not known to have associations with events or persons significant in the past. The resource is recommended not individually eligible for the NRHP under Criteria A, B, or C. Additional study is recommended to determine if the resource may contribute to the potential Bent Mountain Historic District. (Phase I Architectural Survey for Roanoke County (2016), p. 66)

Eligibility:

Phase II research has not been conducted on the resource at this time to determine if it contributes to the Bent Mountain Historic District. For the purpose of consultation the property will be considered as an eligible resource contributing to the district. A determination of eligibility should be made after additional research is conducted.

Effects:

The property is not in the direct effects APE for the project and would not be directly impacted by pipeline construction. Based on images taken from the area toward Blue Ridge Parkway property Parkway staff concluded there may be temporary views of the tops of the construction cranes and side booms during portions of the construction process on the Parkway. Potential impacts to the property include increased traffic and possibly construction related noise. These impacts would be short-term during the duration of the construction. The National Park Service finds the undertaking would have no adverse effect on the property.

Description:

“Bent Mountain is a rural community that was established in the early nineteenth century after the initial settlement period of Roanoke County. By the late nineteenth century, Bent Mountain was renowned for its apple orchards and other farm products that traveled to market in Roanoke down the Bent Mountain Turnpike, now U.S. Route 221. Today, Bent Mountain is characterized by its rural agricultural landscape that features late nineteenth- and early twentieth-century homes, barns, and other outbuildings, as well as well-preserved community buildings like the 1917 Bent Mountain School and 1947 Lawrence Memorial United Methodist Church.” (Phase I Architectural Survey for Roanoke County (2016), p. 31)

“New South Associates recommends additional architectural survey and background research in the Bent Mountain area of Roanoke County to evaluate its eligibility for listing in the NRHP as a rural historic district (Figure 9). Based on the initial reconnaissance survey for this project, Bent Mountain exhibits the physical characteristics of a potential rural historic district, including a concentration of buildings that are united historically by their geography, dates of construction, construction materials, and function.” (Phase I p. 34)

Eligibility:

In their Phase I architectural survey for Roanoke County New South Associates Inc. noted “The proposed rural historic district may be eligible for listing in the NRHP at the local level of significance under Criterion A in the area of Settlement and under Criterion C in the area of Architecture.” While Phase II research is still needed, Blue Ridge Parkway agrees that the district may be eligible for the National Register, and is treating the district as eligible for the purpose of Section 106 consultation.

Effects:

Views from this district would be impacted by the proposed undertaking on Blue Ridge Parkway lands. These impacts include the clearing of a 0.5 acre area of trees along the western boundary of the Parkway. This area would be replanted with grasses, and would remain clear of trees for the life of the right-of way. This grass field would blend in with the existing adjacent agricultural field once the area has had time revegetate.

Impacts also include the short-term views of construction activities on Parkway lands, increased traffic from construction related activities, and potential noise during the construction time period (approximately one month).

Long-term visual impacts to the view on Parkway land are not substantial, and would not alter characteristics of a historic property in a way that impact it for inclusion on the National Register. Other impacts would be short-term. The National Park Service concludes this project will have no adverse effect on this property.

VDHR #080-5677-0004 Concrete Foundation

Description:

“This rectangular foundation parallels the east side of Bent Mountain Road in the Bent Mountain Rural Historic District. It is a concrete slab that is flush with the ground.

The resource does not retain sufficient integrity to be evaluated for the NRHP; and therefore, it is recommended not eligible under Criteria A, B, or C. No additional work is recommended to determine if it is contributing to the larger Bent Mountain Rural Historic District.” (Addendum to the Phase I Reconnaissance Architectural Survey (2017), p. 21)

Eligibility:

Due to the fact this concrete foundation has no integrity, Blue Ridge Parkway staff conclude that the property is not eligible for the National Register. The site should be recorded as an archeological resource, and appears to be in V-CRIS as 44RN0407.

Effects:

As the property is not National Register eligible, the proposed undertaking would have no effect on historic properties at this location.

44RN0384 Archeological Site

Description:

This archeological site consists of a lithic scatter.

Eligibility:

The property has not been evaluated for National Register eligibility at this time, but will be considered as eligible for the purpose of consultation.

Effects:

This resource is outside of the direct effects APE for the project and would not be damaged during construction. Views from the site to the impacts on Parkway lands are screened by trees. The undertaking would have no effect on this property.

The FERC Section 106 Process

NPS notes that the Federal Energy Regulatory Commission's (FERC) Section 106 compliance process should examine the impacts to the above listed properties from the other sections of the pipeline that will be built off of Parkway lands. This should include all effects, direct and indirect, from pipeline construction and operation on properties listed or eligible for the National Register.

Additional Properties in the APE

Your August 14, 2017 letter pointed out that our Assessment of Actions Having an Effect on Historic Properties mentioned that the pipeline route would pass to the north of a residence, but the residence was not identified and impacts on the residence were not considered. In fact, there are two residences in this vicinity. The properties and potential impacts are discussed below.

18550 Callaway Rd, Callaway, VA 24067

Description:

This property is a single family home built in 1976. The brick home has a metal roof and a garage.

Eligibility:

The property is less than 50 years old and does not meet National Register criteria for properties that have achieved significance within the past 50 years. The property is not of exceptional importance, nor does it contribute to a National Register eligible district.

Effects:

As the property is not National Register eligible, the proposed undertaking would have no effect on historic properties at this location.

18428 Callaway Rd, Callaway, VA 24067

Description:

This residence is a single family home built in 1995.

Eligibility:

The property is less than 50 years old and does not meet National Register criteria for properties that have achieved significance within the past 50 years. The property is not of exceptional importance, nor does it contribute to a National Register eligible district.

Effects:

As the property is not National Register eligible, the proposed undertaking would have no effect on historic properties at this location.

Permits

The Parkway would also like to take this opportunity to submit a copy of the draft right-of-way (ROW) permit for this project. The construction permit is still under review and will be submitted as soon as possible. If it is not possible to give concurrence on this project until that draft permit is received, please let us know.

The attached ROW permit reflects the mitigations outlined in our July 13, 2017 letter. Mitigations not covered in this document will be included in the construction permit. One change to mitigation outlined in our July letter would be the requirement to excavate and replant sod from the site. It may not be possible to keep the existing sod viable once removed during the period of construction. NPS and the permittee are still discussing alternatives. At a minimum, the permittee would be required to replant the disturbed area with approved seed mixtures, and approved methods to ensure the area is returned to its pre-disturbance appearance.

Archeological Reports

Your August 14, 2017 letter noted deficiencies with the archeological surveys submitted. The Parkway informed the permit applicant of the deficiencies, and they will be corrected by their contractor. Once the reports are updated, copies will be submitted directly to your office by the contractor.

Sincerely,

A handwritten signature in black ink, appearing to read "John Slaughter", with a stylized, cursive flourish at the end.

John Slaughter
Acting Superintendent
Blue Ridge Parkway

CC: Ethel Eaton

Enclosures (Digital and Hardcopy)

Updated Indirect Effects APE Maps (topographical and road maps)

Draft Right-of-Way Permit

Available on Request

New South Associates, Inc. "Addendum to the Phase I Reconnaissance Architectural Survey for the Mountain Valley Pipeline: Summary Report," March 2017.