



# COMMONWEALTH of VIRGINIA

Molly Joseph Ward  
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](http://www.dhr.virginia.gov)

September 21, 2017

Ms. Megan L. Neylon  
Mountain Valley Pipeline  
625 Liberty Avenue, Suite 1700  
Pittsburgh, PA 15222

Re: *Mountain Valley Pipeline Project, Phase I Survey Supplemental Information and Criteria of Effects Report: Addendum 2, Montgomery and Roanoke Counties, Virginia* (June 2017)  
DHR File No. 2014-1194; FERC #CP16-10

Dear Ms. Neylon:

The Department of Historic Resources (DHR) has received for our review and comment the report referenced above prepared by Tetra Tech for Mountain Valley Pipeline, LLC. The document presents additional Phase I survey information on two architectural properties within the Area of Potential Effects (APE) for the pipeline corridor in order to establish their eligibility for listing in the National Register of Historic Places (NRHP), and evaluates the project's potential effect on six NRHP-eligible architectural resources identified. Five of the six properties had previously been incorrectly identified as located on land under the jurisdiction of the United States Forest Service (USFS) and, as a result, were to be addressed in a later report specific to USFS managed resources.

The two architectural properties included in the current report and evaluated for NRHP eligibility are House and Crib (DHR ID #080-5677-0009) and Single Family Residence and Outbuildings (DHR ID #035-5136). Although a "Phase I Architectural Survey Letter Report" for each of these properties was included as appendixes in the report document, there is no indication that DHR survey forms were completed for them or that the information was entered into our Virginia Cultural Resources Inventory System (VCRIS). We request that this be done as soon as possible. The consultant recommends that 080-5677-0009 does not warrant individual NRHP listing nor is it contributing to the Bent Mountain Rural Historic District (DHR ID #080-5677). Additionally, the consultant recommends that 035-5136 is similarly not eligible for individual listing nor does it contribute to any known historic district. With the information provided in the Phase I letter reports for these two properties, we agree that 080-5677-0009 and 035-5136 lack sufficient historical significance and architectural distinction to be individually eligible for listing in the NRHP. However, we do believe that 080-5677-0009 may contribute to the Bent Mountain Rural Historic District. Unfortunately, without the required VCRIS documentation for this resource DHR is unable to state for certain if this is the case. It should be noted that 035-5136 is located in Giles County which is not reflected in the report's title.

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

The six additional properties for which impacts are assessed are DHR ID #s 060-0290, 060-0337, 060-0340, 060-0414, 060-5178, and 080-5690. We agree that the following properties will not be affected by the project: 060-0290, 060-0337, 060-0340, 060-0414, and 060-5178. Only the Henry-Waldron Cemetery (DHR ID #080-5690) will be indirectly affected because of its “Dominant” viewshed of the undertaking and, therefore, was carried forward for additional analysis. The Henry-Waldron Cemetery is eligible for listing in the NRHP as a contributing element to the Coles-Terry Rural Historic District (DHR ID #080-5689). In our letter dated July 7, 2017, DHR disagreed with the consultant’s recommendation that the pipeline project will not adversely affect the Coles-Terry Rural Historic District. In that previous correspondence we stated that the pipeline will have a direct adverse effect on the rural historic district as it will physically bisect the Coles-Terry Rural Historic District. The “Dominant” viewshed of the pipeline project from the Henry-Waldron Cemetery is due to the fact that an associated access road and permanent workspace will be constructed only fourteen feet from the historic cemetery (Please note that in Table 4.0 the workspace is described as “Permanent” while in Table 4.2 it is characterized as “Temporary”. The text on page 11 reiterates the workspace as being permanent so that is what we have based our analysis.). The DHR believes that the 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. We, therefore, disagree with the consultant’s recommendation and find that the pipeline project will adversely affect the Henry-Waldron Cemetery.

If you have any questions regarding these comments or our review of this project, please do not hesitate to contact me at [roger.kirchen@dhr.virginia.gov](mailto:roger.kirchen@dhr.virginia.gov).

Sincerely,



Roger W. Kirchen, Director  
Review and Compliance Division

c. Ms. Sydne Marshall, Tetra Tech