



September 25, 2017

By Fed Ex and Email

Ms. Ann M. Rogers
Preserve Roanoke
6347 Back Creek Road
Boones Mill, VA 24065
amelvin3@verizon.net

Re: Mountain Valley Pipeline
DHR File 2014-1194
FERC Docket CP16-10
Response to Letter Dated September 19, 2017

Dear Ms. Rogers,

Thank you for your constructive comments on the Treatment Plan for the Bent Mountain Rural Historic District and Coles-Terry Rural Historic District (Treatment Plan). You proposed that the August 25, 2017, Treatment Plan be revised to include a nomination for the Bent Mountain Apple Orchard Rural Historic District, which is wholly contained within the Bent Mountain Rural Historic District. Although it does not appear to us that an independent nomination for the orchard would provide any additional benefit, we believe the objective of your suggestion—a focused survey and documentation of the significance of the orchard—can be provided for in a forthcoming revision to the Treatment Plan.

Mountain Valley recognizes the role that orchards play in conveying the historic significance of the Bent Mountain Rural Historic District. The Treatment Plan notes that “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.” As indicated in the Treatment Plan, “assuming that access to all properties within the districts is obtained, the nomination process will ensure that all contributing and non-contributing objects, sites, structures, buildings, landscape features (natural and built), etc. will be inventoried through intensive-level documentation and research.” You note that a potential Bent Mountain Apple Orchard Historic District is “wholly contained within the Bent Mountain Rural Historic District.” So, as it stands, the nomination proposed in the Treatment Plan would serve the purpose of documenting all resources within the area that you reference.

We plan to make revisions to the Treatment Plan in the near future after we have completed discussions with other relevant parties, including Roanoke County. In response to your comment, we intend to revise the nomination task list in Section 4.2 of the August 25, 2017, Treatment Plan to specifically identify the orchards and direct the nomination preparer to ensure that the orchards

are fully and adequately addressed in the nomination process of the larger Bent Mountain Rural Historic District. I trust that this revision will meet the intent of your suggestion.

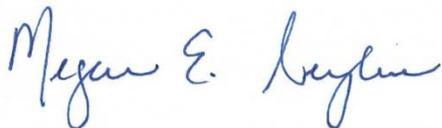
In addition to your suggestion on the Treatment Plan, your letter expresses disagreement with the description of impacts on the Bent Mountain and Coles-Terry Rural Historic Districts as “temporary.” A minor clarification may be helpful. As you are aware, the Virginia Department of Historic Resources found in its July 7, 2017, letter that the project will result in a permanent adverse effect on the districts. That finding triggers the need to evaluate measures to avoid, minimize, or mitigate this adverse effect. To evaluate appropriate measures to avoid, minimize, or mitigate *permanent* adverse effects, it is necessary to assess the nature of the impact and identify which impacts are *temporary*. As stated in the Treatment Plan, surface impacts on many landscape types (e.g., meadows, pastures, cultivated croplands) are, as a factual matter, temporary in nature because the areas will be restored to their preconstruction condition and use. Identifying which physical impacts are temporary is beneficial because it helps to focus the list of potential avoidance and minimization measures to be considered.

Your comment letter also requests that “Roanoke County be engaged in the Section 106 process for the MVP.” Please be aware that Mountain Valley has been in contact with Roanoke County officials regarding consultation on historic resources within the county. Dialogue with the county is ongoing.

The remaining comments in your September 19 letter express critiques of the methodology employed in Mountain Valley’s Criteria of Effects Report—namely, (1) the distinction between rural historic districts and traditional cultural properties and (2) how the landscape (or “space between”) contributing resources in historic districts was evaluated. These criticisms have been addressed in prior correspondence, including my August 25, 2017, letter to you. Unfortunately, I have nothing new to add.

If additional clarification is needed, you may contact me by telephone at (724) 873-3645 or by e-mail at mneylon@eqt.com if you have questions.

Sincerely,



Megan E. Neylon
Senior Environmental Coordinator

cc: Mr. Roger Kirchen, VDHR