



September 25, 2017

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: Mountain Valley Pipeline
Docket No. CP16-10-000
Comprehensive Update on Section 106 Consultation Status**

Dear Ms. Bose:

On behalf of Mountain Valley Pipeline, LLC (Mountain Valley), I am writing to provide this comprehensive update on the status of Section 106 consultations to date and the remaining tasks to be completed. This update is provided for the convenience of you and your staff to facilitate the preparation of a Programmatic Agreement to conclude the Section 106 consultation process. This letter is organized as follows:

- I. Recent Filings with the FERC
- II. Status of Consultation with Virginia SHPO and Consulting Parties
- III. Status of Consultation with West Virginia SHPO and Consulting Parties

I. Recent Filings with the FERC

The following table lists all documents relevant to Section 106 that have been submitted to the FERC in past 30 days.

<u>Document Title</u>	<u>Date Filed</u>
Errata pages for the following reports for the Blue Ridge Parkway: <ul style="list-style-type: none">• Phase I Archaeological Investigation, MVP Alternative 3• Phase II Archaeological Evaluations, Sites BLRI00231 (44RN0383) and BLRI00233 (44FR0402)	September 25, 2017
Transmittal letter to National Park Service regarding errata pages for two reports (Phase I Archaeological Investigation MVP Alternative 3; and Phase II Archaeological Evaluations, Sites BLRI00231 and BLRI00233)	September 25, 2017

<u>Document Title</u>	<u>Date Filed</u>
Supplemental Phase I Archaeological Survey Report of Tract VA-RO-054, and Phase II Archaeological Evaluation Report of Sites 44RN0400 and 44RN0401, Roanoke County, Virginia and Amended Site 44RN0400 and 44RN0401 Treatment Plan	September 25, 2017
Transmittal letter to Virginia SHPO regarding Supplemental Phase I Archaeological Survey Report of Tract VA-RO-054, and Phase II Archaeological Evaluation Report of Sites 44RN0400 and 44RN0401, Roanoke County, Virginia and Amended Site 44RN0400 and 44RN0401 Treatment Plan	September 25, 2017
Revised Historic Property Treatment Plan, Cunningham Farmstead (Losch Farmstead BX-0351)	September 25, 2017
Email to West Virginia SHPO regarding Revised Historic Property Treatment Plan, Cunningham Farmstead (Losch Farmstead BX-0351), with email attachments	September 25, 2017
Letter from Virginia SHPO regarding Phase I Survey Supplemental Information and Criteria of Effects Report: Addendum 2, Montgomery and Roanoke Counties, Virginia (June 2017)	September 25, 2017
Letter from Virginia SHPO regarding Phase IB Archaeological Survey Report Addendum 2 and Phase II Archaeological Evaluation Site 44PY0442, Pittsylvania County, Virginia (December 2016)	September 25, 2017
Letter to Richard Caywood (Roanoke County) regarding survey reports and treatment plans for the Bent Mountain Rural Historic District and Coles-Terry Rural Historic District	September 25, 2017
Response to September 19, 2017 letter from Ann Rogers (Preserve Roanoke)	September 25, 2017
September 8, 2017 email to Betsy Hahn regarding North Fork treatment plan	September 18, 2017
September 15, 2017 transmittal letter of Forest Service treatment plan to the Cherokee Nation	September 18, 2017
September 15, 2017 transmittal letter of Forest Service treatment plan to the Eastern Band of the Cherokee	September 18, 2017
August 25, 2017 letter from National Park Service to Virginia SHPO	September 18, 2017
September 7, 2017 email to Giles County regarding Big Stony and Greater Newport treatment plans	September 18, 2017
Avoidance Plan for Archaeological Site 44GS0252	September 18, 2017
Phase I Archaeological Investigation (revised September 2017), Blue Ridge Parkway, Roanoke and Franklin Counties, Virginia	September 18, 2017
Transmittal letter to National Park Service for Phase I Archaeological Investigation (revised September 2017), Blue Ridge Parkway, Roanoke and Franklin Counties, Virginia	September 18, 2017
Cultural Resources Survey, Addendum 4 to Volume IV, Summers and Monroe Counties, West Virginia	September 18, 2017
September 15, 2017 transmittal letter to West Virginia SHPO regarding Cultural Resources Survey, Addendum 4 to Volume IV, Summers and Monroe Counties, West Virginia	September 18, 2017

<u>Document Title</u>	<u>Date Filed</u>
Phase II Archaeological Investigations, Site 46GB540, Greenbrier County, West Virginia	September 18, 2017
September 15, 2017 transmittal letter to West Virginia SHPO regarding Phase II Archaeological Investigations, Site 46GB540, Greenbrier County, West Virginia	September 18, 2017
September 8, 2017 email from Roanoke County requesting meeting on Section 106	September 18, 2017
Plan of Development	September 18, 2017
Response to September 11, 2017 letter from Matthew Fellerhoff	September 18, 2017
Response to September 7, 2017 letter from Richard Chidester	September 18, 2017
Historic Property Treatment Plan, Losch Farmstead (BX-0351), with transmittal letters to relevant parties	September 18, 2017
Historic Property Treatment Plan, St. Bernard's Church and Cemetery (NR#85001583), with transmittal letters to relevant parties	September 18, 2017
Historic Property Treatment Plan, Underwood Farmstead (LE- 0150), with transmittal letters to relevant parties	September 18, 2017
September 15, 2017 transmittal letter to West Virginia SHPO regarding three historic property treatment plans (Losch Farmstead, St. Bernard's Church and Cemetery, and Underwood Farmstead)	September 18, 2017
Response to Section 106 Environmental Information Request Issued by FERC August 25, 2017	September 5, 2017
Jefferson National Forest Treatment Plan for Archaeological Site	August 25, 2017
August 24, 2017 Letter to Giles County Historical Society (Joseph Yost) regarding rescheduling a meeting	August 25, 2017
August 2, 2017 Letter from the Virginia Department of Historic Resources requesting additional information about the Addendum to the Phase I Reconnaissance Architectural Survey for the Mountain Valley Pipeline: Summary Report, Pittsylvania, Franklin, Roanoke, Montgomery, Craig, and Giles Counties, Virginia	August 25, 2017
August 18, 2017 Letter Responding to the Virginia Department of Historic Resources' August 2, 2017 Letter	August 25, 2017
Letter to the Greater Newport Historic District Committee regarding potential mitigation options	August 25, 2017
August 18, 2017 Letter from the Virginia Department of Historic Resources providing comments on the Mountain Valley Pipeline Project, Phase II Archaeological Evaluations of 18 Sites, Franklin County, Virginia	August 25, 2017
August 3, 2017 Letter from the West Virginia Division of Culture and History providing comments on the Architectural and Historic Resources, Criteria of Effects Report	August 25, 2017
August 23, 2017 Letter from the West Virginia Division of Culture and History regarding the Haught House/New Dale Farm	August 25, 2017
August 15, 2017 Letter from the West Virginia Division of Culture and History providing comments on Phase II Archaeological Investigations and Contingency Treatment Plans	August 25, 2017

<u>Document Title</u>	<u>Date Filed</u>
August 25, 2017 Response to requests of Preservation Virginia and Virginia Department of Historic Resources	August 25, 2017
August 25, 2017 Cover Letter to Virginia Department of Historic Resources enclosing Historic Property Treatment Plans	August 25, 2017
Historic Property Treatment Plan for the Bent Mountain Rural And Coles-Terry Rural Historic Districts	August 25, 2017
Historic Property Treatment Plan for the Greater Newport Rural Historic District	August 25, 2017
Historic Property Treatment Plan for the Big Stony Creek Historic District	August 25, 2017
Historic Property Treatment Plan for the North Fork Valley Rural Historic District	August 25, 2017
August 25, 2017 Letter responding to July 12, 2017 comments of Preserve Roanoke	August 25, 2017

II. Status of Consultation with Virginia SHPO and Consulting Parties

Consultation with the Virginia SHPO and other relevant consulting parties has been productive, although a substantial number of reports have been pending review for greater than 30 days. With the exception of a Virginia SHPO letter dated September 21, 2017, Mountain Valley has responded to all adverse effect findings by submission of an avoidance or treatment plan. In the recent letter, Virginia SHPO indicated that there will be an adverse effect to the Henry-Waldron Cemetery (080-5689) related to use of an adjacent road as a permanent access road. Mountain Valley is currently reviewing the letter and will determine whether a treatment plan is necessary or the site can be avoided. Other relevant consulting parties have been engaged in consultation regarding the resolution of adverse effects, which has been documented in recent filings and in this filing with FERC.

The following table lists all pending reports that have been submitted to the Virginia Department of Historic Resources but for which no comments have yet been received.

Report Title	Date Submitted to VA SHPO
Reeve et al. January 2017, Mountain Valley Pipeline Project, <i>Phase IB Archaeological Survey Report, Addendum 1, Roanoke and Montgomery Counties, Virginia</i>	January 16, 2017
Reeve et al. January 2017, Mountain Valley Pipeline Project, <i>Phase IB Addendum I Archaeological Survey, and Phase II Evaluations of Sites 44GS0227, 44GS0229, 44GS0230, 44GS0231, and 44GS0236, Giles County, Virginia</i>	January 24, 2017
Jacoby & Marshall, February 2017, <i>Mountain Valley Project, Avoidance Plans for 19 Archaeological Sites and Rock Overhangs, Craig, Franklin, Giles, Montgomery, and Pittsylvania Counties, Virginia</i>	February 17, 2017

Report Title	Date Submitted to VA SHPO
Clement et al. 22 June 2017, <i>Jefferson National Forest, ARPA Permit BBW43304T, Cultural Resources Survey, Mountain Valley Project, Phase II Investigations, Sites GS0238, 44GS0240, 44GS0241, 44GS0242, 44GS0243, 44GS0244, 44GS0247, 44GS025, 44MY0577, and 035-5134, Giles and Montgomery Counties, Virginia</i>	July 26, 2017 (Provided by JNF to SHPO)
Dye & Marshall, June 2017, <i>Addendum 1, Mountain Valley Pipeline Project, Criteria of Effects Report for Historic Architectural Resources Within the Blue Ridge Parkway National Park, Franklin, Roanoke, and Floyd Counties, Virginia</i>	June 1, 2017
Reeve et al. June 2017, <i>Mountain Valley Pipeline Project, Phase I Archaeological Survey, and Phase II Archaeological Evaluation, Site 44FR0370, Franklin County, Virginia</i>	June 30, 2017
Tetra Tech, June 2017, <i>Mountain Valley Pipeline Project, Site 44FR0370 Avoidance Plan and Contingency Treatment Plan, Franklin County, Virginia</i>	June 30, 2017
Tetra Tech, June 2017, <i>Mountain Valley Pipeline Project, Sites 44RN0400 and 44RN0401 Treatment Plan, Roanoke County, Virginia</i>	July 5, 2017
Maskevich & Marshall, July 2017, <i>Mountain Valley Pipeline Project, Phase I Archaeological Survey Report of Tract VA-RO-54, Roanoke County, Virginia</i>	July 5, 2017
Mountain Valley's response to VDHR's July 7, 2017 comment letter regarding Criteria of Effects Report for Virginia	August 25, 2017
Tetra Tech, August 2017, <i>Mountain Valley Pipeline Project, Historic Property Treatment Plan: Bent Mountain Rural Historic District (080-0322) and Coles-Terry Rural Historic District (080-5689)</i>	August 29, 2017
Tetra Tech, August 2017, <i>Mountain Valley Pipeline Project, Historic Property Treatment Plan: Big Stony Creek Historic District (035-5127)</i>	August 29, 2017
Tetra Tech, August 2017, <i>Mountain Valley Pipeline Project, Historic Property Treatment Plan: Greater Newport Rural Historic District (035-0412)</i>	August 29, 2017
Tetra Tech, August 2017, <i>Mountain Valley Pipeline Project, Historic Property Treatment Plan: North Fork Valley Rural Historic District (060-0574)</i>	August 29, 2017
Tetra Tech, September 2017, <i>Revised Avoidance Plan for Henry-Gregory House(080-5677-0008)</i>	September 5, 2017

Report Title	Date Submitted to VA SHPO
Tetra Tech, September 2017, Mountain Valley Pipeline Project, REVISED Phase I Archaeological Investigation in National Park Service- Blue Ridge Parkway, Roanoke and Franklin Counties, Virginia	September 12, 2017 (NPS and VDHR)
Tetra Tech, September 2017, Mountain Valley Pipeline Project, Supplemental Phase I Archaeological Survey Report of Tract VA-RO-054 and Phase II Archaeological Evaluation Report of Sites 44RN0400 and 44RN0401, Roanoke County, Virginia	September 22, 2017
Amended Site 44RN0400 and 44RN0401 Treatment Plan	September 22, 2017
Mountain Valley Pipeline Project, REVISED Historic Property Treatment Plan: Bent Mountain Rural Historic District (080-0322) and Coles-Terry Rural Historic District (080-5689)	TBD*
Avoidance Plan for Archaeological Site 44GS0252	September 15, 2017

*The revised Treatment Plan will be filed in mid-October following additional discussions with Roanoke County regarding mitigation measures identified in the plan.


III. Status of Consultation with West Virginia SHPO and Consulting Parties

The following table lists all pending reports that have been submitted to the West Virginia Division of Culture and History but for which no comments have yet been received.

Report	Date Submitted to WV SHPO
Espino, et al., August 2017, <i>Addendum 2 to Volume III, Cultural Resources Survey, Mountain Valley Pipeline Project, Nicholas and Greenbrier Counties, West Virginia</i>	August 4, 2017
Mountain Valley Pipeline Project, Historic Property Treatment Plan: Losch Farmstead (BX-0351)	September 14, 2017
Mountain Valley Pipeline Project, Historic Property Treatment Plan: St. Bernard's Church and Cemetery (NR#85001583)	September 14, 2017
Mountain Valley Pipeline Project, Historic Property Treatment Plan: Underwood Farmstead (LE-0150)	September 14, 2017
Barse et al., September 2017, Phase II Archaeological Investigations Site 46GB540, Mountain Valley Pipeline Project, Greenbrier County West Virginia	September 18, 2017
Espino, et al., September 2017, <i>Addendum 4 to Volume IV, Cultural Resources Survey, Mountain Valley Pipeline Project, Summers and Monroe Counties, West Virginia</i>	September 18, 2017

We trust that you will find this information useful as you work toward conclusion of the Section 106 process. Please contact me at 412-395-3305 if you have any questions.

Respectfully Submitted,
Mountain Valley Pipeline, LLC



John Centofanti
Corporate Director, Environmental affairs

cc: Mr. Paul Friedman, FERC
Mr. John Eddins, ACHP
Ms. Charlene Vaughn, ACHP
Mr. Roger Kirchen, VDHR
Ms. Susan Pierce, WVDCH