



555 Southpointe Boulevard, | Canonsburg, PA  
15317  
844-MVP-TALK |  
mail@mountainvalleypipeline.info

September 5, 2017

Mr. Roger Kirchen  
Virginia Department of Historic Resources  
Division of Review and Compliance  
2801 Kensington Avenue  
Richmond, VA 23221

**Subject: Mountain Valley Pipeline Project**  
**Re: Revised Avoidance Plan for Henry-Gregory House (DHR ID #080-5677-0008)**  
**DHR File No. 2014-1194; FERC #CP16-10**

Dear Mr. Kirchen:

Mountain Valley Pipeline, LLC (MVP), a joint venture between affiliates of EQT Midstream Partners, LP, NextEra Energy, Inc., Con Edison Midstream Gas, LLC, WGL Holdings, Inc., and RGC Midstream LLC, is providing updated information regarding avoidance and minimization measures for the Henry-Gregory House (DHR ID #080-5677-0008), a Master List resource that serves as a potentially contributing element to the Bent Mountain Rural Historic District.

Subsequent to the submittal of the *Criteria of Effects Report* (May 2017), which included an avoidance plan for this resource in its Appendix P, the proposed route of temporary access road MVP-RO-285 was modified due to constructability issues and in order to avoid impacts on nearby aquatic features. This modification resulted in preparation of an updated Avoidance Plan and identification of additional minimization measures to prevent direct and indirect impacts on the abandoned (unoccupied) Henry-Gregory House. The updated Avoidance Plan is provided as Attachment 1 and additional construction details related to this resource are provided as Attachment 2.

The route of temporary access road MVP-RO-285, as currently proposed, would utilize parts of an existing farm road. The portion of the access road that would parallel the building's side elevation is an overgrown segment of that existing farm road, photographs of which are provided in Attachment 3. The Henry-Gregory House's side porch stands five feet from what would be the boundary of the 25-foot-wide temporary access road. Avoidance and minimization measures MVP would employ to prevent direct and indirect impacts on the Henry-Gregory House, as depicted in the revised Avoidance Plan (Attachment 1), include:

1. Pre-construction survey to document current condition of the property;
2. Reduction of access road to 25-feet-wide;
3. Utilization of jersey barrier and protective fencing (through which driveway access would be maintained);
4. Utilization of speed limits to minimize vibration levels from truck traffic; and,
5. Restoration of access road to original conditions post-construction.

As noted in the *Criteria of Effects Report*, due to the proximity of the Henry-Gregory House to the access road, a pre-construction survey would be conducted by a team composed of a qualified structural engineer and qualified architectural historian. Construction equipment necessary for vibration-intensive activities in proximity to the resource would be selected based on the results of the pre-construction survey. On the basis of the screening threshold distances identified, precautionary restrictions such as limiting the number of pieces of construction equipment operating in proximity to the building at one time would be implemented. Impacts are not anticipated due to the precautionary restrictions MVP would implement; however, should impacts such as foundation cracking or settlement occur, MVP would work to address and resolve complaints regarding the construction and/or operation of the Project in a timely manner. A qualified architectural historian would be involved in the complaint resolution process.

The Henry-Gregory House is unoccupied; however, driveway access would be maintained during construction. Additionally, MVP personnel would maintain close contact with the owners of this property during all pipeline construction activities. If excessive dust is reported by the property owners during access road construction or during its period of use during pipeline construction, then temporary mitigation may be offered.

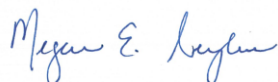
MVP does not anticipate any permanent indirect visual effects to this abandoned residence due to the construction and use of temporary access road MVP-RO-285. The access road would be located within an open pasture field and would use parts of an existing farm road; no tree-clearing would be required. The temporary access road location would be restored to pre-construction conditions post-construction. Visual impacts on this resource as a result of *permanent* project facilities in the vicinity of this resource were addressed at the Task 1 level of assessment during which it was eliminated from further visual effects analysis due to distance and vegetation.

Please review the attached Avoidance Plan under Section 106 of the National Historic Preservation Act, as amended. The Avoidance Plan will also be filed with the Federal Energy Regulatory Commission, lead federal agency overseeing the MVP Project.

Should you have any questions regarding the attached Avoidance Plan you may contact me by telephone at (724) 873-3645 or by e-mail at [mneylon@eqt.com](mailto:mneylon@eqt.com). You may also contact Hannah Dye, by telephone at (304) 685-6593 or by e-mail at [hannah.dye@tetrattech.com](mailto:hannah.dye@tetrattech.com).

Thank you for your attention.

Sincerely,



Mr. Roger Kirchen  
September 5, 2017  
Page 3

Megan E. Neylon  
Senior Environmental Coordinator  
Attachments

Attachment 1 Avoidance Plan for Henry-Gregory House (DHR# 080-5677-0008) (Revised August 2017)

Attachment 2 Site Specific Construction Details

Attachment 3 Photographs

cc: Brian Clauto, MVP  
Sean Sparks, Tetra Tech  
Sydney Marshall, Tetra Tech  
James Marine, Tetra Tech  
Hannah Dye, Tetra Tech



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## **ATTACHMENT 1**

**AVOIDANCE PLAN**  
(Revised August 2017)

Document Path: P:\EOT-Equitrans\MVP-Project\GIS\Spatial\MXD02\_Cultural\20170815\_VA\_COE\_Avoidance\_Plans\_Direct\_APEVA\_COE\_Avoidance\_Plans\_20170815.mxd

080-5677-0008  
Henry-Gregory House  
Primary Contributing A, C  
Distance to LOD: 5ft

Add Protective Fencing

Add Jersey Barrier

MVP-RO-285

Temporary access road would utilize an existing route of two-track dirt road in front of the abandoned house

Temporary access road would be reduced to 25 feet-wide and would be restored to original conditions post-construction

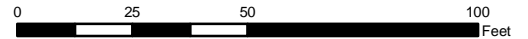
Pre-construction survey would be conducted by qualified architectural historian and structural engineer

Speed limits would be used to minimize vibration levels from truck traffic

**Mountain Valley Pipeline Project**










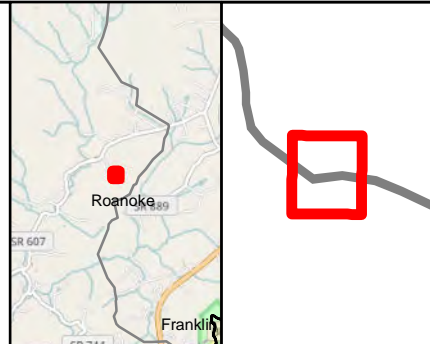
NAD 1983 UTM 17N




**Avoidance Plan**  
Site: 080-5677-0008  
Henry-Gregory House  
Roanoke County, Virginia

August 2017

- Legend**
-  Avoided Historical Architectural Resource
  -  Jersey Barrier
  -  Protective Fencing
  -  Temporary Access Road
  -  Direct APE
  -  Proposed Limits of Disturbance
  -  Temporary Limit of Disturbance



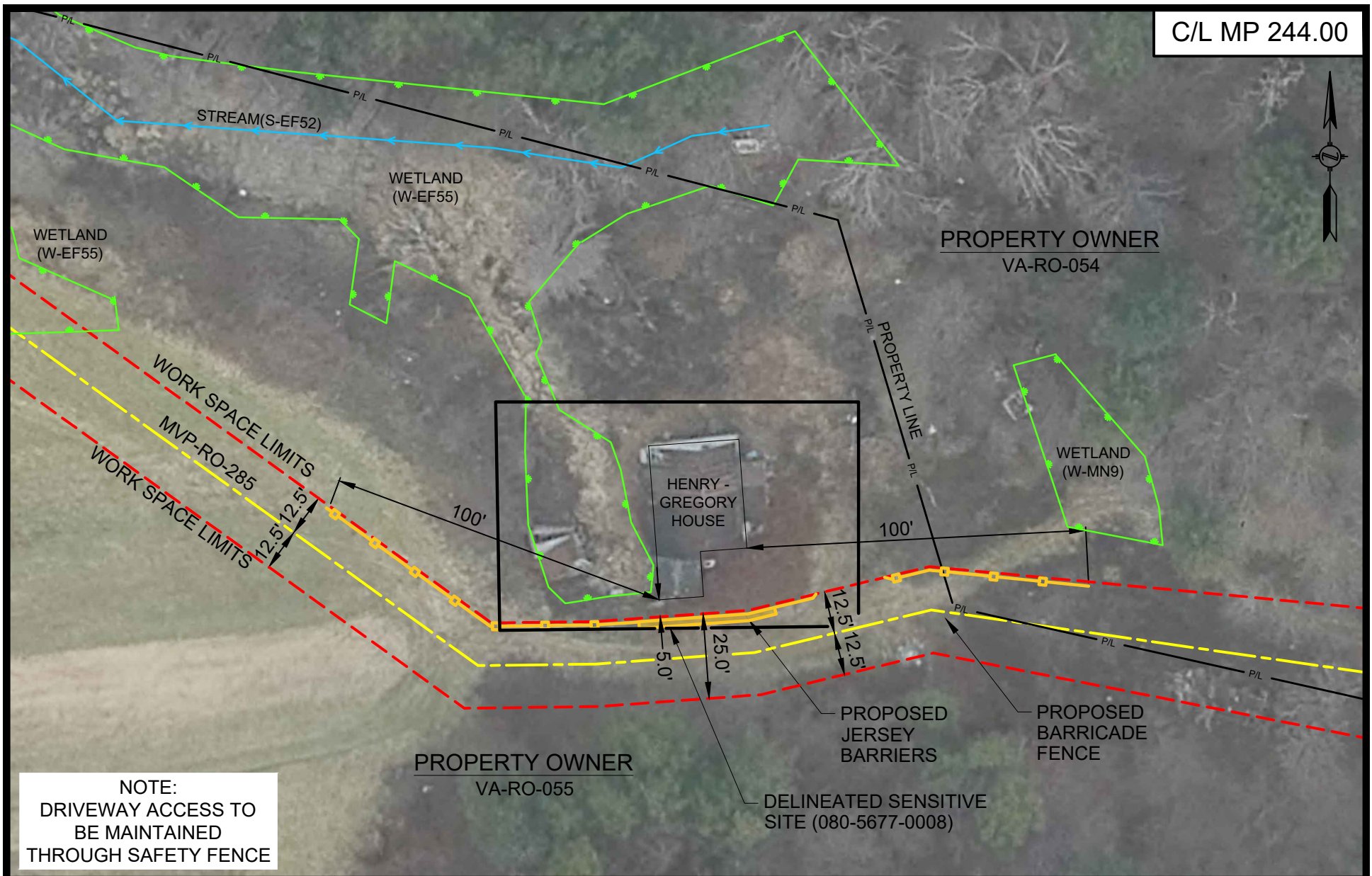
Data Sources: USGS, ESRI, Open Street Map, VDHR.



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**ATTACHMENT 2**  
**SITE SPECIFIC CONSTRUCTION DETAILS**





**NOTE:**  
 DRIVEWAY ACCESS TO  
 BE MAINTAINED  
 THROUGH SAFETY FENCE

# HOLLAND ENGINEERING

220 Hoover Boulevard, Suite 2  
 Holland, Michigan 49423-3766  
 T 616-392-5938 F 616-392-2116

26555 Evergreen Rd. Suite. 430  
 Southfield, Michigan 48076  
 T 248-827-7322 F 248-827-7549

www.hollandengineering.com

HEI PROJECT NO.: 14-10-052



## CONSTRUCTION DETAILS - RESIDENTIAL SITE SPECIFIC

**MOUNTAIN VALLEY PIPELINE PROJECT**  
**HENRY-GREGORY HOUSE (DHR#080-5677-0008)**  
**ROANOKE COUNTY, VIRGINIA**

SHEET 1 OF 1

DRAWN BY: HEI(SRD)	10/14/16
DRAFTING CK:	
ENVIRONMENTAL CK:	
ENGINEERING CK:	
DETAIL SHEET: MVP-QDAR-H600-97	
DRAWING NO.:	
<b>RSS-H600-220</b>	
SCALE: 1" = 40'	REV. 0
DATE OF PLOT: 9/5/2017 7:54 AM	

**ATTACHMENT 3**  
**PHOTOGRAPHS**





Henry-Gregory House (DHR ID #080-5677-0008), Farm road with overgrowth, View W



Henry-Gregory House (DHR ID #080-5677-0008), Farm road with overgrowth, View W



Henry-Gregory House (DHR ID #080-5677-0008), Aerial Photograph (April 30, 2011) showing route of farm road