

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

1. File treatment plans to resolve adverse effects at the Big Stony Creek Historic District, Greater Newport Rural Historic District, North Fork Valley Rural Historic District, Bent Mountain Rural Historic District, and Coles-Terry Rural Historic District; and archaeological site 44GS241-Historic Site 35-5129. Document that the treatment plans were produced in consultations with the appropriate consulting parties, and were approved by the Virginia State Historic Preservation Office (SHPO).

Response:

Mountain Valley filed with FERC treatment plans for the Big Stony Creek Historic District, Greater Newport Rural Historic District, North Fork Valley Rural Historic District, and a combined treatment plan for the Bent Mountain and Coles-Terry Rural Historic Districts on August 25, 2017. These treatment plans document consultations with the appropriate consulting parties conducted in July and August 2017. On August 25, 2017, the Giles County Historical Society declined to meet with Mountain Valley to discuss the Greater Newport Rural Historic District and the Big Stony Creek Historic District treatment plans (Attachment DR6 Q1a). The Giles County Board of Supervisors contacted Mountain Valley in a letter dated August 30, 2017, indicating that the board would meet to discuss potential mitigation measures related to the Greater Newport Rural Historic District and the Big Stony Creek Historic District (Attachment DR6 Q1b). This meeting has not yet been scheduled. Mountain Valley will file meeting minutes with the FERC after the meeting.

Mountain Valley submitted the treatment plans to the Virginia Department of Historic Resources on August 25, 2017. The transmittal letter was filed with the FERC on August 25, 2017. Comments from the Virginia Department of Historic Resources will be filed with the FERC when received.

In addition, Mountain Valley distributed copies of the draft treatment plans to the appropriate consulting parties on August 28, 2017, to provide an additional opportunity for comments by September 11, 2017. Copies of the transmittal letters to the consulting parties were filed with the FERC on August 25, 2017. Attachment DR6 Q1c identifies the consulting parties and the distribution of the treatment plans. Comments will be filed with the FERC when received.

The treatment plan for archaeological site 44GS241 was also filed on August 25, 2017, with the FERC. Mountain Valley provided the treatment plan to the Jefferson National Forest on August 17, 2017, and the transmittal letter is attached (Attachment DR6 Q1d). In its letter dated July 26, 2017, the Forest Supervisor indicated that site 035-5129 has

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

been determined not eligible for the National Register of Historic Places (Attachment DR6 Q1e). As a result, Mountain Valley is not preparing a treatment plan for site 035-5129.

Mountain Valley continues to coordinate with six Indian tribes that have expressed interest in the Project. Attachment DR6 Q1f documents coordination efforts conducted since December 2016.

Respondent: Megan Neylon
Position: Supervisor - Environmental Permitting
Phone Number: 724-873-3645
Date: September 5, 2017

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

2. Confirm that no historic properties in the state of West Virginia would be adversely affected by the Mountain Valley Project (MVP). Or, if any historic properties in West Virginia would be adversely affected, identify the sites, reference the report that documents the sites and the date the reports was filed with the FERC, and file documentation that the West Virginia Department of Culture and History (WVDCH), representing the SHPO, concurs with the findings of National Register of Historic Places (NRHP) eligibility and adverse effects. In addition, file treatment plans to resolve adverse effects for any sites in West Virginia that would be adversely affected by the MVP, and the SHPO review of those plans.

Response:

In *Mountain Valley Pipeline Project, Criteria of Effects Report, Wetzel, Harrison, Doddridge, Lewis, Braxton, Webster, Nicholas, Greenbrier, Fayette, Summers, and Monroe Counties, West Virginia* (February 2017) and in supplemental information provided to WVDCH on June 30, 2017, regarding MVP's Criteria of Effects assessment, Mountain Valley recommended that no historic properties in West Virginia would be adversely affected by the Project. In a letter dated August 3, 2017, WVDCH disagreed with Mountain Valley, finding that four historic properties—Haught House/ New Dale Farm (HS-0610), Underwood Farmstead (LE-0150), St. Bernard's Church and Cemetery (NR 85001583), and Losch Farmstead (BX-0351)—would be adversely affected by the Project. In WVDCH's opinion, tree clearance and permanent right-of-way areas would permanently alter the resources' settings, resulting in adverse effects. This letter was filed with the FERC August 25, 2017.

Subsequently, in a letter dated August 23, 2017, WVDCH rescinded its previous finding of adverse effect to the Haught House/New Dale Farm. The letter indicated that, based on a revised Historic Property Inventory Form (including recent photographs) provided to WVDCH on August 16, 2017, the resource is no longer eligible for the National Register of Historic Places (NRHP). WVDCH also stated that no additional consultation regarding this resource is necessary. A copy of this letter was filed with the FERC August 25, 2017. Table 2 below summarizes information related to WVDCH consultations for each of the remaining properties.

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

Table 2 Summary of WVDCH Consultations								
WVSHPO ID	Resource Name	Address	Date	Mountain Valley's NRHP Recom.	NRHP Determination by WVDCH (Date)	Phase I Report Ref.	Mountain Valley's Criteria of Effects Assess. Results ^c	WVDCH's Criteria of Effects Findings (date)
LE-0150	Underwood Farmstead	CR 10/Freemans Creek Road	c.1900	Eligible	Eligible: Criterion A and C (10/6/2015)	Tetra Tech 2015 ^a	No Adverse Effect	Adverse Effect (8/3/2017)
NR 85001583	St. Bernard's Church and Cemetery	Loveberry Ridge Road	c.1909	Maintain NRHP-Listing	Maintain NRHP Listing (10/6/2015)	Tetra Tech 2015	No Effect	Adverse Effect (8/3/2017)
BX-0351	Losch Farmstead	CR 23 (Vernon Road)	c.1890	Eligible	Eligible (12/8/2016)	SEARCH 2016 ^b	No Effect	Adverse Effect (8/3/2017)
<p>a/ Mountain Valley Pipeline Project Phase I Cultural Resources Survey, Volume 1: Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia. Report prepared for Mountain Valley Pipeline, LLC by Tetra Tech, Inc. West Virginia Division of Culture and History, Historic Preservation Unit, Charleston, WV, 2015 (Filed with the FERC September 9, 2015).</p> <p>b/ Mountain Valley Pipeline Project Phase I Cultural Resources Survey, Addendum 1 to Volume II: Braxton and Webster Counties West Virginia. Report prepared for Mountain Valley Pipeline, LLC by Tetra Tech, Inc. West Virginia Division of Culture and History, Historic Preservation Unit, Charleston, WV, 2016 (Filed with the FERC December 22, 2016).</p> <p>c/ Mountain Valley Pipeline Project, Criteria of Effects Report, Wetzel, Harrison, Doddridge, Lewis, Braxton, Webster, Nicholas, Greenbrier, Fayette, Summers, and Monroe Counties, West Virginia. Report prepared for Mountain Valley Pipeline, LLC by Tetra Tech, Inc. West Virginia Division of Culture and History, Historic Preservation Unit, Charleston, WV, 2017 (Filed with the FERC February 16, 2017).</p>								

As requested by WVDCH in the August 3, 2017 comment letter, Mountain Valley evaluated alternatives for the undertaking to avoid or minimize the adverse effects due to permanent tree clearance on the Underwood Farmstead (LE-0150), St. Bernard's Church and Cemetery (NR 85001583), and Losch Farmstead (BX-0351). Vegetation removal for MVP has been minimized to the greatest practicable extent through co-location with other facilities and reduction in the right-of-way. Mountain Valley believes that additional changes to project construction or restoration practices will not effectively ameliorate the source of the adverse effect identified by WVDCH—permanent tree clearance—on the setting of these three resources. As such, Mountain Valley is working with stakeholders to identify potential mitigation measures in order to develop treatment plans for the three historic properties. A summary of that consultation will be included in the treatment plans. The treatment plans will be submitted to the WVDCH and filed with the FERC on September 8, 2017. Mountain Valley will file WVDCH comments with the FERC when received.

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

Respondent: Megan Neylon
Position: Supervisor - Environmental Permitting
Phone Number: 724-873-3645
Date: September 5, 2017

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

3. Revise Marine et al. June 2017, Mountain Valley Pipeline Project, Phase I Archaeological Survey, Addendum 3 to Volume IV, Tracts WV-MO-012-040 and WV-MO-012-055, Monroe County, West Virginia as follows:
 - a. include a table with the milepost (MP) location of all sites in the direct area of potential effect (APE), and provide the distances (in feet) from sites to project workspaces and the pipeline centerline.

Response:

The referenced report includes a single prehistoric archaeological site within the direct APE. Table 3 includes the requested information for this site is included below.

Table 3			
<i>Site in the Direct APE from Mountain Valley Pipeline Project, Phase I Archaeological Survey, Addendum 3 to Volume IV, Tracts WV-MO-012-040 and WV-MO-012-055, Monroe County, West Virginia</i>			
Site Number	Milepost	Distance from Workspace (feet)	Distance from Centerline (feet)
46ME311	179.05	0	0

With regard to this site:

- Mountain Valley recommended Phase II evaluation of the site. The SHPO concurred with this recommendation in comments dated July 25, 2017, and approved the Phase II workplan presented in the report. SHPO comments are attached (Attachment DR6 Q3a).
- The report *Mountain Valley Pipeline Project, Phase II Archaeological Investigation, Site Avoidance and Contingency Treatment Plan* (Barse et.al 2017) recommended site 46ME311 as eligible for listing in the National Register of Historic Places (NRHP). The report also included a Site Avoidance Plan and Contingency Treatment Plan. The SHPO concurred that site 46ME311 was eligible for the NRHP and approved the Site Avoidance Plan and Contingency Treatment Plan in comments dated August 15, 2017. The SHPO requested that the Contingency Treatment Plan be included in the Programmatic Agreement for the Project. The SHPO comments were filed with FERC on August 25, 2017.

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

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**Mountain Valley Pipeline, LLC
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Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
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4. Revise Lockett et al. July 2017, Addendum 2 to Volume 1, Cultural Resources Survey, Mountain Valley Pipeline Project, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia as follows:
 - a. include a table with the MP location of all sites in the direct APE, and provide the distances (in feet) from sites to project workspaces and the pipeline centerline; and
 - b. describe the projectile point found at site 46WZ163.

Response:

Table 4 provides the distance in feet from the limits of disturbance (LOD) and the direct APE of the closest Project facility (e.g., centerline, workspace, access road) for all sites reported on in *Mountain Valley Pipeline Project, Cultural Resources Survey, Addendum 2 to Volume I, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia* (Lockett et al. July 2017). SHPO comments concurring with the recommendations of the report and avoidance plan for site 46LE111, Locus 2, are attached (Attachment DR6 4a)

With regard to the projectile point:

- The total prehistoric assemblage at site 46WZ163 consisted of a basal fragment of a projectile point and a single piece of lithic debitage. The point base could not be definitively attributed to a specific period of prehistory. The extant portion of the point base measured 3 centimeters in length, was fashioned from light-gray chert, was biconvex in cross-section, and exhibited shallow side-notches.

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

Table 4 Sites in the Direct APE listed in <i>Mountain Valley Pipeline Project, Cultural Resources Survey, Addendum 2 to Volume I, Harrison Doddridge Counties, West Virginia</i> (Lackett et.al July 2017)								
Site Number	County	Type	Recommendation	Nearest MP	Distance to Direct APE (feet)	Distance to LOD (feet)	Distance to Pipeline Centerline (feet)	Nearest Project Facility
46LE111 Locus 1	Lewis	Historic-Archaeological	Not Eligible	61.9	0	0	1,733	Temporary Workspace Bordering Access Road MVP-LE-077.01
46LE111 Locus 2	Lewis	Historic and Prehistoric Archaeological	Avoidance – reconfigured temporary workspace along access road to avoid site ¹	61.9	0	0	1,854	Temporary Workspace Bordering Access Road MVP-LE-077.01
46LE111 Locus 3	Lewis	Historic-Archaeological	Not Eligible	61.9	0	0	1,983	Temporary Workspace Bordering Access Road MVP-LE-077.01
Temp. ID 0265	Lewis	Historic-Architectural	Not Eligible	61.9	0	0	1,745	Temporary Workspace Bordering Access Road MVP-LE-077.01
46WZ163	Wetzel	Prehistoric-Archaeological	Not Eligible	2.7	0	0	4,390	Bradshaw Compressor Station Interconnect
46LE112	Lewis	Isolated Find	Not Eligible	41.1	0	0	528	Additional Temporary Workspace MVP-ATWS-059A
46LE113	Lewis	Isolated Find	Not Eligible	47.5	0	0	155	Additional Temporary Workspace MVP-ATWS-476

¹An avoidance plan for site 46LE111, Locus 2, is included in *Mountain Valley Pipeline Project, Cultural Resources Survey, Addendum 2 to Volume I, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia* (Lackett et al. July 2017).

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

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**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

5. Revise Lockett et al. July 2017, Addendum 2 to Volume II, Cultural Resources Survey, Mountain Valley Pipeline Project, Braxton and Webster Counties, West Virginia as follows:
- a. include a table with the MP location of all sites in the direct APE, and provide the distance (in feet) from sites to project workspaces and the pipeline centerline.

Response:

Table 5 below provides the distance in feet from the limits of disturbance (LOD) and the direct APE of the closest Project facility (e.g., centerline, workspace, access road) for all sites reported on in *Mountain Valley Pipeline Project, Cultural Resources Survey, Addendum 2 to Volume II, Braxton and Webster Counties West Virginia* (Lockett et al. July 2017). SHPO comments concurring with the recommendations of the report were included in Attachment DR6 Q4a, attached to the response to the previous question.

Table 5 Sites in the Direct APE Included in <i>Mountain Valley Pipeline, Cultural Resources Survey, Addendum 2 to Volume II, Braxton and Webster Counties, West Virginia</i> (Lockett et al. July 2017)								
Site Number	County	Type	Recommendation	Nearest MP	Distance to Direct APE (feet)	Distance to LOD (feet)	Distance to Pipeline Centerline (feet)	Nearest Project Facility
46BX133	Braxton	Historic-Archaeological and Isolated Find-Prehistoric	Not Eligible	70.2	0	0	2,725	Access Road MVP-BR-090.01
46BX134	Braxton	Isolated Find-Prehistoric	Not Eligible	75.3	0	0	3,160	Additional Temporary Workspace MVP-ATWS-1459A

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

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**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

6. Revise Espino, et al., August 2017, Addendum 2 to Volume III, Cultural Resources Survey, Mountain Valley Pipeline Project, Nicholas and Greenbrier Counties, West Virginia as follows:
 - a. include a table with the MP location of all sites in the direct APE, and provide the distance (in feet) from sites to project workspaces and the pipeline centerline.

Response:

Table 6 provides the distance in feet from the limits of disturbance (LOD) and the direct APE of the closest Project facility (e.g., centerline, workspace, access road) for all sites reported on in *Mountain Valley Pipeline Project, Cultural Resources Survey, Addendum 2 to Volume III, Braxton and Webster Counties West Virginia* (Espino et al. August 2017). The Avoidance Plan for site 46GB540 is included as Attachment DR6 6a. Please note that the Phase II report for site 46GB540 is in preparation and is anticipated to be submitted on September 15, 2017.

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

Table 6 Sites in the Direct APE listed in <i>Mountain Valley Pipeline, Cultural Resources Survey, Addendum 2 to Volume III, Nichols and Greenbrier Counties, West Virginia</i> (Espino et.al August 2017)								
Site Number	County	Type	Recommendation	Nearest Milepost	Distance to APE (feet)	Distance to LOD (feet)	Distance to Pipeline Centerline (feet)	Nearest Project Facility
46GB540*	Greenbrier	Prehistoric-Archaeological	Eligible; avoid by reconfiguring Access Road MVP-GB-177	138.3	0	89	126.7	Access Road MVP-GB-177
46GB541	Greenbrier	Prehistoric-Archaeological	Not Eligible	154.7	0	0	1,280	Laydown Yard MVP-LY-025
46GB542	Greenbrier	Prehistoric-Archaeological	Avoid by reconfiguring Laydown Yard MVP-LY-025	154.7	0	0	1,165	Laydown Yard MVP-LY-025
46GB543	Greenbrier	Prehistoric and Historic-Archaeological	Avoid by reducing pipeline corridor LOD, eliminating Additional Temporary Workspace MVP-ATWS-1437 and Access Road MVP-GB-190.02	155	0	0	42	Pipeline Corridor LOD, Additional Temporary Workspace MVP-ATWS-1437 and Access Road MVP-GB-190.02
46GB544	Greenbrier	Isolated Find -Historic	Not Eligible	154.7	0	0	72	Laydown Yard MVP-LY-025
46GB545	Greenbrier	Isolated Find -Prehistoric	Not Eligible	154.9	0	25.1	75	Pipeline Corridor LOD
46GB547	Greenbrier	Isolated Find -Prehistoric	Not Eligible	155	0	33.2	86	Pipeline Corridor LOD
46GB548	Greenbrier	Isolated Find -Prehistoric	Not Eligible	155	253	360	19	Pipeline Corridor LOD
46NI855	Nicholas	Prehistoric and Historic-Archaeological	Avoid by reconfiguring MVP-ATWS-981	112.6	1.9	1.9	67	Additional Temporary

**Mountain Valley Pipeline, LLC
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Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

Table 6								
Sites in the Direct APE listed in <i>Mountain Valley Pipeline, Cultural Resources Survey, Addendum 2 to Volume III, Nichols and Greenbrier Counties, West Virginia</i> (Espino et.al August 2017)								
Site Number	County	Type	Recommendation	Nearest Milepost	Distance to APE (feet)	Distance to LOD (feet)	Distance to Pipeline Centerline (feet)	Nearest Project Facility
								Workspace MVP-ATWS-981
46NI856	Nicholas	Prehistoric-Archaeological	Avoid by reconfiguring MVP-ATWS-699	125.3	0	0	209	Additional Temporary Workspace MVP-ATWS-699
Avoidance plans are included in the report <i>Mountain Valley Pipeline Project, Cultural Resources Survey, Addendum 2 to Volume III, Braxton and Webster Counties West Virginia</i> (Espino et al. August 2017).								
* The Avoidance Plan for site 46GB540 is attached (Attachment DR6 6a).								

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**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

7. File copies of the West Virginia SHPO reviews of:
- a. Marine et al. June 2017, Mountain Valley Pipeline Project, Phase I Archaeological Survey, Addendum 3 to Volume IV, Tracts WV-MO-012-040 and WV-MO-012-055, Monroe County, West Virginia;
 - b. Marine et al. July 2017, Mountain Valley Pipeline Project, Contingency Treatment Plan for Site 46GB498, Greenbrier County, West Virginia;
 - c. Barse et al., July 2017, Mountain Valley Pipeline Project, Site 46ME311 Phase II Archaeological Investigation, Site Avoidance Plan, and Contingency Treatment Plan;
 - d. Lackett et al. July 2017, Addendum 2 to Volume 1, Cultural Resources Survey, Mountain Valley Pipeline Project, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia;
 - e. Lackett et al. July 2017, Addendum 2 to Volume II, Cultural Resources Survey, Mountain Valley Pipeline Project, Braxton and Webster Counties, West Virginia; and
 - f. Espino, et al., August 2017, Addendum 2 to Volume III, Cultural Resources Survey, Mountain Valley Pipeline Project, Nicholas and Greenbrier Counties, West Virginia.

Response:

To date no comments have been received from the West Virginia SHPO on Espino, et al., August 2017, *Addendum 2 to Volume III, Cultural Resources Survey, Mountain Valley Pipeline Project, Nicholas and Greenbrier Counties, West Virginia*. The SHPO comments on this report will be filed with FERC when received by Mountain Valley.

The remainder of the comments received from the West Virginia SHPO have been previously filed with the FERC or are filed as attachments to Mountain Valley's responses to the current EIR. Table 7 below summarizes the disposition of comments from the West Virginia SHPO on the reports listed in Question 7.

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

Table 7 Disposition of West Virginia SHPO Comments on the Reports Listed in Question 7		
Report	Date SHPO Comments Filed with FERC	Attachment # in Current EIR
Marine et al. June 2017, <i>Mountain Valley Pipeline Project, Phase I Archaeological Survey, Addendum 3 to Volume IV, Tracts WV-MO-012-040 and WV-MO-012-055, Monroe County, West Virginia</i>	Filed with Current EIR	Attachment DR6 Q3a
Marine et al. July 2017, <i>Mountain Valley Pipeline Project, Contingency Treatment Plan for Site 46GB498, Greenbrier County, West Virginia</i>	8/25/2017	N/A
Barse et al., July 2017, <i>Mountain Valley Pipeline Project, Site 46ME311 Phase II Archaeological Investigation, Site Avoidance Plan, and Contingency Treatment Plan</i>	8/25/2017	N/A
Lackett et al. July 2017, <i>Addendum 2 to Volume I, Cultural Resources Survey, Mountain Valley Pipeline Project, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia</i>	Filed with Current EIR	Attachment DR6 Q4a
Lackett et al. July 2017, <i>Addendum 2 to Volume II, Cultural Resources Survey, Mountain Valley Pipeline Project, Braxton and Webster Counties, West Virginia</i>	Filed with Current EIR	Attachment DR6 Q4a
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>	To Date No Comments Have Been Received	N/A

Respondent: Megan Neylon
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Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000

Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017

8. File copies of the Virginia SHPO reviews of:
 - a. Reeve et al. September 2016, Mountain Valley Pipeline Project, Phase I Archaeological Investigation, Modification FS78 Survey Boundary in Jefferson National Forest, Monroe County, West Virginia, and Giles County, Virginia;
 - b. Reeve et al. November 2016, Mountain Valley Pipeline Project, Phase I Archaeological Investigations, Craig Creek to Brush Mountain Route Survey in Jefferson National Forest, Monroe County, West Virginia, and Giles County, Virginia;
 - c. Reeve et al. December 2016, Mountain Valley Pipeline Project, Phase I Archaeological Investigation, Craig Creek to Brush Mountain Route Survey and Mystery Ridge Route Survey in Jefferson National Forest, Giles and Montgomery Counties, Virginia;
 - d. Reeve et al. January 2017, Mountain Valley Pipeline Project, Phase IB Archaeological Survey Report, Addendum 1, Roanoke and Montgomery Counties, Virginia;
 - e. Reeve et al. January 2017, Mountain Valley Pipeline Project, Phase IB Addendum 1 Archaeological Survey, and Phase II Evaluations of Sites 44GS0227, 44GS0229, 44GS0230, 44GS0231, and 44GS0236, Giles County, Virginia;
 - f. Reeve et al. February 2017, Mountain Valley Pipeline Project, Phase II Archaeological Evaluations of 18 Sites, Franklin County, Virginia;
 - g. Jacoby & Marshall, February 2017, Mountain Valley Project, Avoidance Plans for 19 Archaeological Sites and Rock Overhands, Craig, Franklin, Giles, Montgomery, and Pittsylvania Counties, Virginia;
 - h. Maskevich & Marshall, April 2017, Mountain Valley Pipeline Project, Phase IB Combined County Archaeological Survey Report, Addendum 1, Giles, Montgomery, Roanoke, and Franklin Counties, Virginia, and Phase II Archaeological Evaluation of Site 44FR0412, Franklin County, Virginia;
 - i. Clement et al. 22 June 2017, Jefferson National Forest, ARPA Permit BBW43304T, Cultural Resources Survey, Mountain Valley Project, Phase II Investigations, Sites GS0238, 44GS0240, 44GS0241, 44GS0242,

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

44GS0243, 44GS0244, 44GS0247, 44GS025, 44MY0577, and 035-5134, Giles and Montgomery Counties, Virginia;

- j. Dye. & Marshall, June 2017, 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;
- k. Dye & Marshall, June 2017, Mountain Valley Pipeline Project, Phase I Survey Supplemental Information and Criteria of Effects Report: Addendum 2, Montgomery and Roanoke Counties, Virginia;
- l. Reeve et al. June 2017, Mountain Valley Pipeline Project, Phase I Archaeological Survey, and Phase II Archaeological Evaluation, Site 44FR0370, Franklin County, Virginia;
- m. Tetra Tech, June 2017, Mountain Valley Pipeline Project, Site 44FR0370 Avoidance Plan and Contingency Treatment Plan, Franklin County, Virginia;
- n. Tetra Tech, June 2017, Mountain Valley Pipeline Project, Sites 44RN0400 and 44RN0401 Treatment Plan, Roanoke County, Virginia;
- o. Maskevich & Marshall, July 2017, Mountain Valley Pipeline Project, Phase I Archaeological Survey Report of Tract VA-RO-54, Roanoke County, Virginia; and
- p. Maskevich & Marshall, August 2017, Mountain Valley Pipeline Project, Phase IB Combined County Archaeological Survey Report, Addendum II, Giles, Montgomery, Roanoke, Franklin, and Pittsylvania Counties, Virginia.

Response:

A summary of the Virginia SHPO reviews received is provided in Table 8-1. Copies of SHPO review letters are included as Attachments DR6 8a, 8b, 8c, and 8d.

Table 8-1			
Summary of Virginia SHPO Reviews of MVP Reports			
Report Title	Date Submitted to SHPO	Date of SHPO Review Letter	Attachment ID
Reeve et al. September 2016, <i>Mountain Valley Pipeline Project, Phase I Archaeological Investigation, Modification</i>	Provided by JNF to SHPO for review	April 26, 2017	8a

**Mountain Valley Pipeline, LLC
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**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

Table 8-1			
Summary of Virginia SHPO Reviews of MVP Reports			
Report Title	Date Submitted to SHPO	Date of SHPO Review Letter	Attachment ID
<i>FS78 Survey Boundary in Jefferson National Forest, Monroe County, West Virginia, and Giles County, Virginia</i>	(Submission Date Unknown)		
Reeve et al. November 2016, <i>Mountain Valley Pipeline Project, Phase I Archaeological Investigations, Craig Creek to Brush Mountain Route Survey in Jefferson National Forest, Monroe County, West Virginia, and Giles County, Virginia</i>	Provided by JNF to SHPO for review (Submission Date Unknown)	April 26, 2017	8a
Reeve et al. December 2016, <i>Mountain Valley Pipeline Project, Phase I Archaeological Investigation, Craig Creek to Brush Mountain Route Survey and Mystery Ridge Route Survey in Jefferson National Forest, Giles and Montgomery Counties, Virginia</i>	Provided by JNF to SHPO for review (Submission Date Unknown)	April 26, 2017d	8a
Reeve et al. February 2017, <i>Mountain Valley Pipeline Project, Phase II Archaeological Evaluations of 18 Sites, Franklin County, Virginia</i>	February 15, 2017	August 18, 2017	8b
Maskevich & Marshall, April 2017, <i>Mountain Valley Pipeline Project, Phase IB Combined County Archaeological Survey Report, Addendum 1, Giles, Montgomery, Roanoke, and Franklin Counties, Virginia, and Phase II Archaeological Evaluation of Site 44FR0412, Franklin County, Virginia</i>	June 27, 2017	August 30, 2017	8c
Maskevich & Marshall, August 2017, <i>Mountain Valley Pipeline Project, Phase IB Combined County Archaeological Survey Report, Addendum II, Giles, Montgomery, Roanoke, Franklin, and Pittsylvania Counties, Virginia</i>	August 4, 2017	August 30, 2017	8d

In addition, Virginia SHPO is reviewing the following reports listed in table 8-2.

Table 8-2			
Summary of Pending Virginia SHPO Reviews of MVP Reports			
Report Title	Date Submitted to SHPO	Date of SHPO Review Letter	Attachment ID
Reeve et al. January 2017, <i>Mountain Valley Pipeline Project, Phase IB Archaeological Survey Report, Addendum 1, Roanoke and Montgomery Counties, Virginia</i>	January 16, 2017	Pending	--
Reeve et al. January 2017, <i>Mountain Valley Pipeline Project, Phase IB Addendum 1 Archaeological Survey, and Phase II Evaluations of Sites 44GS0227, 44GS0229, 44GS0230, 44GS0231, and 44GS0236, Giles County, Virginia</i>	January 24, 2017	Pending	--

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

Table 8-2 Summary of Pending Virginia SHPO Reviews of MVP Reports			
Report Title	Date Submitted to SHPO	Date of SHPO Review Letter	Attachment ID
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	Pending	--
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)	Pending	--
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	Pending	--
Dye & Marshall, June 2017, <i>Mountain Valley Pipeline Project, Phase I Survey Supplemental Information and Criteria of Effects Report: Addendum 2, Montgomery and Roanoke Counties, Virginia</i>	July 5, 2017	Pending	--
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	Pending	--
Tetra Tech, June 2017, <i>Mountain Valley Pipeline Project, Site 44FR0370 Avoidance Plan and Contingency Treatment Plan, Franklin County, Virginia</i>	June 30, 2017	Pending	--
Tetra Tech, June 2017, <i>Mountain Valley Pipeline Project, Sites 44RN0400 and 44RN0401 Treatment Plan, Roanoke County, Virginia</i>	July 5, 2017	Pending	--
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	Pending	--
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	Pending	--
Tetra Tech, August 2017, <i>Mountain Valley Pipeline Project, Historic Property Treatment Plan: Big Stony Creek Historic District (035-5127)</i>	August 29, 2017	Pending	--

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

Table 8-2 Summary of Pending Virginia SHPO Reviews of MVP Reports			
Report Title	Date Submitted to SHPO	Date of SHPO Review Letter	Attachment ID
Tetra Tech, August 2017, <i>Mountain Valley Pipeline Project, Historic Property Treatment Plan: Greater Newport Rural Historic District (035-0412)</i>	August 29, 2017	Pending	--
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	Pending	--

Respondent: Megan Neylon
 Position: Supervisor - Environmental Permitting
 Phone Number: 724-873-3645
 Date: September 5, 2017

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

9. Explain why the following sites were not illustrated on the copies of U.S. Geological Survey (USGS) - 7.5-minute topographic quadrangle maps showing site locations in the direct APE included with Attachment Z of your June 30, 2017 filing: 44GS242, 35-5129, 35-5134, 35-5104, 35-5099, 35-5097, 35-5096, 35-5093, 35-5095, 35-5114, 35-5091, 35-5112, 35-45, 35-412-245, 35-5001, 35-412-237, 35-412-69, 35-412-68, 35-412-35, 35-412-466, 35-412-10, 22-5035, 44MY580, 44MY579, 44MY582, 44MY216, 60-5167, 60-5150, 60-5151, 44FR402, 44FR405, 44FR388, 33-389, 33-5398, 33-5326, 33-5383, 33-5377, 33-5380, 33-5320, 33-5343, 33-5318, 33-5316, 33-5315, 33-5313, 33-5314, 33-5312, 33-5311, 33-5310, 44PY427, 71-5490, 71-5489, 71-5522, 71-5481, 71-5496, 71-5500, 71-5484, 71-5483, 71-5494, 71-5508, 71-5495, 71-5311, 71-5519, 71-5516, and 188-5286. Revise the maps accordingly and re-file with the FERC.

Response:

Of the 64 sites listed above, 11 sites were in fact included in the maps contained in Attachment Z of the June 30, 2017, supplemental filing. Table 9 below provides information on where these 11 sites are depicted in the June 30, 2017, Attachment Z submittal.

Table 9 Cultural Resources Sites Listed in Question 9 that are Depicted in Attachment Z of Mountain Valley's June 30, 2017, FERC Filing		
State	SHPO ID	Attachment Z Page Number
Virginia	44GS0242	Page 36 of 67
Virginia	035-0412-0245	Page 39 of 67
Virginia	035-5001	Page 39 of 67
Virginia	035-0412-0237	Page 40 of 67
Virginia	035-0412-0069	Page 40 of 67
Virginia	035-0412-0068	Page 40 of 67
Virginia	035-0412-0035	Page 40 of 67
Virginia	035-0412-0466	Page 41 of 67
Virginia	035-0412-0010	Page 41 of 67
Virginia	033-5343	Page 50 of 67
Virginia	033-5310	Page 51 of 67

Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000

Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017

Of the 64 sites listed above, one site, Mystery Ridge Road (035-5134), should have been included as part of Attachment Z of the June 30, 2017, supplemental filing but was inadvertently omitted. The enclosed Attachment DR6 Q9a replaces pages 35 and 37 of the June 30, 2017, Attachment Z and incorporates site 035-5134 into the map. Site 188-5286 does not match any of the sites recorded by Mountain Valley or included with V-CRIS in the vicinity of the project. Mountain Valley believes that the site number in question is likely Site 118-5286, the Lynchburg & Danville Railroad Historical District, which crosses the pipeline alignment at milepost 298.35. Site 118-5286 was inadvertently omitted as part of Attachment Z of the June 30, 2017, supplemental filing. The enclosed Attachment DR6 Q9b replaces page 56 of the June 30, 2017, Attachment Z and incorporates Site 118-5286 into the map.

The remaining 51 sites listed in question 9 were not included on the maps contained in Attachment Z of Mountain Valley's June 30, 2017, supplemental filing because they are not located within the Project's direct APE. Attachment DR6 Q9c lists the 51 sites and indicates their distances from the direct APE and the limits of disturbance.

Respondent: Megan Neylon
Position: Supervisor - Environmental Permitting
Phone Number: 724-873-3645
Date: September 5, 2017

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

10. Explain why the following sites were not listed on the table of sites within the direct APE contained in Attachment D to your July 7, 2017 filing: 46HS124, 46LE78, LE-265, 46ME273, 46NI812, 46SU526, 46SU239, 46SU719, 46SU738, 46SU163, 46WB412, 46WB440, 44FR402, 44FR387, 44FR405, 44FR398, 44FR400, 44FR372, 44FR388, 44FR380, 33-185, 33-5287, 33-5409, 33-389, 33-5399, 33-5400, 33-5398, 33-5326, 33-5383, 33-5377, 33-5413, 33-5380, 33-5320, 33-5412, 33-5130, 33-5318, 33-5316, 33-5315, 33-5313, 33-5314, 33-5312, 33-5311, 33-5337, 44GS251, 44GS247, 44GS238, 35-5129, 35-5134, 35-5104, 35-5099, 35-5097, 35-5096, 35-5093, 35-5095, 35-5114, 35-5091, 35-5112, 35-5102, 35-5130, 35-45, 35-5105, 35-412-52, 35-412-468, 35-412-466, 35-412-10, 44MY580, 44MY579, 44MY577, 44MY582, 44MY216, 60-5193, 60-332, 60-5200, 60-574-126, 60-5191, 60-574-127, 60-5158, 60-5167, 60-5150, 60-5151, 60-5157, 60-5194, 60-5171, 44PY427, 71-5490, 71-5489, 71-5522, 71-5488, 71-5481, 71-5496, 71-5500, 71-5484, 71-5483, 71-5494, 71-5508, 71-5495, 71-5311, 71-5519, 71-5516, 71-5255, 71-5524, 44RN390, 80-5297, 80-5677, 80-5677-4, 80-5161-341, 80-5161-343, 80-5161-342, 80-5161-344, and 80-5161-188. Revise the table accordingly, and re-file with the FERC.

Response:

Of the 110 sites listed above, seven sites were included in the table contained in Attachment D of the July 7, 2017, supplemental filing. Table 10.1 below provides information on where these seven sites are listed in the July 7, 2017, Attachment D table.

State	SHPO ID	Attachment D Page Number
Virginia	44FR0380	Page 15
Virginia	035-5102	Page 16
Virginia	035-5130	Page 16
Virginia	035-0412-0466	Page 12
Virginia	035-0412-0010	Page 12
Virginia	44MY0577	Page 17
Virginia	080-5677	Page 20

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

Of the 110 sites listed above, three sites, LE-0265, 035-5134 and 060-5200, should have been included as part of Attachment D of the July 7, 2017, supplemental filing but were inadvertently omitted. The enclosed Attachment DR6 10a replaces page 15 of the July 7, 2017, Attachment D filing and incorporates site 035-5134 into the table; the enclosed Attachment DR6 10b replaces page 17 of the July 7, 2017, Attachment D filing and incorporates site 060-5200 into the table; the enclosed Attachment DR6 10c replaces page 1 of the July 7, 2017, Attachment D filing and incorporates site LE-0265 into the table.

The remaining 100 sites listed in question 10 were not included on the table contained in Attachment D of Mountain Valley's July 7, 2017, supplemental filing because they are not located within the Project's direct APE. The enclosed Attachment DR6 10d lists these 100 sites and indicates their distances from the direct APE and the limits of disturbance.

Respondent: Megan Neylon
Position: Supervisor - Environmental Permitting
Phone Number: 724-873-3645
Date: September 5, 2017

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

11. Provide data, including report citations and the dates those reports were filed with the FERC, about the following sites that were either illustrated on the USGS-7.5-minute topographic quadrangle maps showing site locations in the direct APE included with Attachment Z of your June 30, 2017 filing or listed on the table of sites within the direct APE contained in Attachment D to your July 7, 2017 filing, for which Commission staff has no previous information: site WV-BX19 (Braxton County); site Temp-ID-258 (Webster County); site WV-NI-53 (Nicholas County); sites WV-GB-33 and WV-GB-27 (Greenbrier County); sites 46SU741 and WV-SU-1 (Summers County); sites Temp-WV-ME-27-CEM, WV-ME-28, WV-ME-30, 46ME312, and 46ME313 (Monroe County); site 35-412-465 (Giles County); site Temp-VA-RO-S-11 (Roanoke County); and site 33-5130 (Franklin County). Document that those reports were reviewed by the appropriate SHPO, and file the SHPO finding of NRHP eligibility and project effects for each of the sites listed above.

Response:

Data for the sites listed in Question 11 is provided in Table 11 included as Attachment DR6 Q11.

Respondent: Megan Neylon
Position: Supervisor - Environmental Permitting
Phone Number: 724-873-3645
Date: September 5, 2017

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

12. File copies of the West Virginia SHPO findings of NRHP eligibility and project effects for site 46WZ163 in Wetzel County; sites 177/HS-495-6, HS-897/168, HS-900/174, HS-899/169, HS-904/161, WV-HA-27-CEM, and HS-901/167 in Harrison County; sites 46LE111 and 265 in Lewis County; site 46BX133 in Braxton County; sites 46NI856 and WV-NI-40-CEM in Nicholas County; sites 46GB540, 46GB541, 46GB542, and 46GB543 in Greenbrier County; and site 46ME311 in Monroe County.

Response:

Table 12 summarizes the disposition of West Virginia SHPO comments on the reports listed in Question 12.

Please note that, to date, Mountain Valley has not received comments from the West Virginia SHPO for sites 46NI856 in Nicholas County and sites 46GB540, 46GB541, 46GB542, and 46GB543 in Greenbrier County. SHPO review comments on the report documenting these sites will be filed with FERC when received by Mountain Valley.

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

Table 12						
Disposition of West Virginia SHPO Review Comments on the Cultural Resources Reports Listed in Question 12						
SHPO ID	Temp Site ID	Site Type	Recommendation	Report Reference	Date SHPO Review Comments Filed with FERC	Attachment # in Current EIR Response
46WZ163	WV-WZ-020	Prehistoric-Archaeological	Not Eligible	Lackett et al. July 2017, <i>Addendum 2 to Volume 1, Cultural Resources Survey, Mountain Valley Pipeline Project, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia</i>	9/5/17	Attachment DR6 4a
HS-0495-0006	0177	Residence	Not Eligible	Espino et al. July 2015, <i>Mountain Valley Pipeline Project, Cultural Resources Survey Volume I, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia</i>	10/23/15	N/A
HS-0897	0174	Residence	Not Eligible	Espino et al. July 2015, <i>Mountain Valley Pipeline Project, Cultural Resources Survey Volume I, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia</i>	10/23/15	N/A
HS-0899	0169	Baltimore & Ohio Railroad	Not Eligible	Espino et al. July 2015, <i>Mountain Valley Pipeline Project, Cultural Resources Survey Volume I, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia</i>	10/23/15	N/A
HS-0900	0168	Smith Baptist Church	Not Eligible	Espino et al. July 2015, <i>Mountain Valley Pipeline Project, Cultural Resources Survey Volume I, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia</i>	10/23/15	N/A
HS-0904/	0161	Bridge	Not Eligible	Espino et al. July 2015, <i>Mountain Valley Pipeline Project, Cultural Resources Survey Volume I, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia</i>	10/23/15	N/A

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

Table 12						
Disposition of West Virginia SHPO Review Comments on the Cultural Resources Reports Listed in Question 12						
SHPO ID	Temp Site ID	Site Type	Recommendation	Report Reference	Date SHPO Review Comments Filed with FERC	Attachment # in Current EIR Response
NO SHPO ID	WV-HA-27-CEM	Stillborn Infant Burial too recent to qualify for SHPO ID	Avoided; this resources is outside the LOD but will be fenced	Espino et al. November 2016, <i>Mountain Valley Pipeline Project, Cultural Resources Survey, Addendum 1 to Volume I, Wetzel, Harrison, Doddridge and Lewis Counties, West Virginia</i>	12/22/16	N/A
HS-0901	0167	Farmstead	Not Eligible	Espino et al. July 2015, <i>Mountain Valley Pipeline Project, Cultural Resources Survey Volume I, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia</i>	10/23/15	N/A
46LE111 Locus 1	WV-LE-018-1	Historic-Archaeological	Not Eligible	Lackett et al. July 2017, <i>Addendum 2 to Volume 1, Cultural Resources Survey, Mountain Valley Pipeline Project, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia</i>	9/5/17	Attachment DR6 4a
46LE111 Locus 2	WV-LE-018-2	Historic and Prehistoric Archaeological	Avoided by reconfiguring temporary workspace along access road MVP-077.01	Lackett et al. July 2017, <i>Addendum 2 to Volume 1, Cultural Resources Survey, Mountain Valley Pipeline Project, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia</i>	9/5/17	Attachment DR6 4a
46LE111 Locus 3	WV-LE-018-3	Historic-Archaeological	Not Eligible	Lackett et al. July 2017, <i>Addendum 2 to Volume 1, Cultural Resources Survey, Mountain Valley Pipeline Project, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia</i>	9/5/17	Attachment DR6 4a
Pending	0265	Historic-Architectural (Root Cellar)	Not Eligible	Lackett et al. July 2017, <i>Addendum 2 to Volume 1, Cultural Resources Survey, Mountain Valley Pipeline Project, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia</i>	9/5/17	Attachment DR6 4a

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

Table 12						
Disposition of West Virginia SHPO Review Comments on the Cultural Resources Reports Listed in Question 12						
SHPO ID	Temp Site ID	Site Type	Recommendation	Report Reference	Date SHPO Review Comments Filed with FERC	Attachment # in Current EIR Response
46NI856	WV-NI-053	Prehistoric-Archaeological	Avoided by reconfiguring MVP-ATWS-699	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>	Pending	N/A
NO SHPO ID	WV-NI-40-CEM	Donahue-Cemetery, two modern burials of insufficient age to qualify for SHPO ID	Avoided; this resources is outside the LOD but will be fenced	Espino, et al., January 2017, <i>Addendum 1 to Volume III, Cultural Resources Survey, Mountain Valley Pipeline Project, Nicholas, Greenbrier and Fayette Counties, West Virginia.</i>	2/17/17	N/A
46GB540	WV-GB-032	Prehistoric-Archaeological	Eligible; avoided by reconfiguring Access Road MVP-GB-177	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>	Pending	N/A
46GB541	WV-GB-034	Prehistoric-Archaeological	Avoided by reconfiguring Laydown Yard MVP-LY-025	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>	Pending	N/A
46GB542	WV-GB-033	Prehistoric-Archaeological	Avoided by reconfiguring Laydown Yard MVP-LY-025	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>	Pending	N/A
46GB543	WV-GB-027	Prehistoric and Historic-Archaeological	Avoided by reducing pipeline corridor LOD, eliminating Additional Temporary	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>	Pending	N/A

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

Table 12						
Disposition of West Virginia SHPO Review Comments on the Cultural Resources Reports Listed in Question 12						
SHPO ID	Temp Site ID	Site Type	Recommendation	Report Reference	Date SHPO Review Comments Filed with FERC	Attachment # in Current EIR Response
			Workspace MVP-ATWS-1437 and Access Road MVP-GB-190.02			
46BX133	WV-BX-019	Historic-Archaeological and Isolated Find-Prehistoric	Not Eligible	Lackett et al. July 2017, <i>Addendum 2 to Volume II, Cultural Resources Survey, Mountain Valley Pipeline Project, Braxton and Webster Counties, West Virginia</i>	9/5/17	Attachment DR6 4a
46ME3111	WV-ME-027	Prehistoric-Archaeological	Eligible, avoided by boring	Barse et.al 2017, <i>Site 46ME311 Mountain Valley Pipeline Project, Phase II Archaeological Investigation, Site Avoidance and Contingency Treatment Plan</i>	8/25/17	N/A

Respondent: Megan Neylon
Position: Supervisor - Environmental Permitting
Phone Number: 724-873-3645
Date: September 5, 2017

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

13. File copies of the Virginia SHPO findings of NRHP eligibility and project effects for sites 44GS234, 44GS245, 44GS249, and 44GS250 in Giles County; sites 44MY584, 44MY576, 44MY582, 44MY583, and 60-5200 in Montgomery County; sites 44RN390, 44RN391, 44RN389, 44RN387, 44RN388, 44RN399, 44RN400, 44RN401, 44RN381, 44RN385, 44RN392, 44RN393, 44RN394, 80-5677-9, 80-5677-4, 80-5161-341, and 80-5161-188 in Roanoke County; sites 44FR402, 44FR369, 44FR370, 44FR394, 44FR410, 44FR391, 44FR392, 44FR397, 44FR401, 44FR376, 44FR186, 44FR215, 44FR216, 44FR189, 44FR190, 44FR191, 44FR396, 44FR406, 44FR412, 44FR373, 44FR371, 44FR404, 44FR372, 44FR407, 44FR368, 44FR366, 44FR363, 44FR360, and 33-5287 in Franklin County.

Response:

Responses to this question are contained in Attachment DR6 13a (Table 13). The SHPO findings of NRHP eligibility are provided as Attachments DR6 Q13b-Q13j.

Respondent: Megan Neylon
Position: Supervisor - Environmental Permitting
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Date: September 5, 2017

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

14. As requested by the Virginia SHPO, in a letter dated July 7, 2017, file a Task 4 Assessment of sites 35-412-244 and 35-412-465 within the Greater Newport Rural Historic District of Giles County; a Task 4 Assessment of site 60-574-125 within the North Fork Valley Rural Historic District of Montgomery County; and a Visual Assessment of 33-5325 in Franklin County. Include the SHPO review of the assessments.

Response:

Mountain Valley replied to Virginia Department of Historic Resources' July 7, 2017, request by letter dated August 25, 2017, which is provided as Attachment DR6 14. VDHR's response to Mountain Valley's letter will be filed with the FERC when received.

Mountain Valley's August 25, 2017 response included site plans showing the relationship of a proposed access road to **Link Farm (035-0412-0244)** as well as a photo simulation illustrating the appearance of the access road from this historic property. As requested by VDHR, the site plan and photo simulation were used to further assess potential direct or visual effects from the planned access road to this historic property. As the permanent access road follows an existing tractor path and the view of the widened graveled road from the Link Farm residence would largely be screened by vegetation, the photo simulation for this resource received a rating of "Inferior." In turn, it was recommended by Mountain Valley that this permanent access road would result in No Adverse Effect.

Mountain Valley attempted to gain access to the property containing **Cemetery (DHR ID #035-0412-0465)**, in order to produce a photo simulation for the Task 4 criteria of effects assessment; however, permission to reenter this property has not yet been granted. Mountain Valley will provide a full photo simulation and Task 4 Assessment for the Cemetery (DHR ID #035-0412-0465), as requested by VDHR, when access to the property containing this resource is granted.

Mountain Valley's response included the results of Task 4 criteria of effects assessment for the **Kraft Barn (DHR ID #060-0574-0125)**, as requested by VDHR. The resulting photograph simulation indicated that a temporary access road and pipeline right-of-way would be visible northeast of the Kraft Barn. The access road would be located within an open pasture field at the location of an existing tractor path; no tree-clearing would be required. The temporary access road location would be restored to pre-construction conditions post-construction. Likewise, vegetation removal that would occur through an open pasture field for the pipeline construction right-of-way would also be restored to pre-construction conditions post-construction. The photo simulation for this resource

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

received a rating of “Inferior” and as such, Mountain Valley recommended that the project would result in No Adverse Effect to this resource.

Also included in Mountain Valley’s August 25, 2017 response was a site plan showing the relationship of a proposed access road to **House at Windswept Lane (033-5325)** as well as a photo simulation illustrating the appearance of the access road from this historic property. As requested by VDHR, the site plan and photo simulation were used to further assess potential direct or visual effects from the planned access roads to this historic property. The permanent access road would consist of a gravel surface and would appear dominant in the landscape. As such, the photo simulation for this resource received a rating of “Dominant.” However, as noted in Mountain Valley’s response to VDHR’s July 7, 2017, letter, this permanent access road would follow the exact path of an existing gravel driveway—an abandoned former rural route that crossed the property during the resource’s recommended period of significance—and an existing tractor path/farm lane. In other words, while the visual impact of this proposed permanent access road on the House at Windswept Lane would be Dominant, Mountain Valley recommended that the permanent access road would result in No Adverse Effect to this resource. Instead, the construction of the access road would, in effect, restore an historic-era landscape feature to the property that is consistent with the resource’s period of historic significance.

Respondent: Megan Neylon
Position: Supervisor - Environmental Permitting
Phone Number: 724-873-3645
Date: September 5, 2017

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

15. File avoidance plans for site HS-897/168 in Harrison County, and sites 46SU733-CEM and 46SU732-CEM in Summers County, West Virginia; and site 44GS231 in Giles County, site 60-5194 in Montgomery County, site 80-5690 in Roanoke County, sites 44FR387, 33-5315, and 33-5403 in Franklin County, and site 71-5488 in Pittsylvania County, Virginia. Include the SHPO review of the plans.

Response:

- Avoidance plans for the three West Virginia sites have been filed previously with the FERC; Table 15 provides recommendations, SHPO concurrence, and dates of filings.
- Site 44GS231 was recommended not NRHP-eligible; SHPO concurrence is pending. Should the Virginia Department of Historic Resources (VDHR) disagree, an avoidance plan will be filed with VDHR and FERC.
- Site 60-5194 is 235 feet from the MVP direct APE; no avoidance plan is needed.
- Site 44FR387 has been subsumed into NRHP-eligible site 44FR370. An avoidance plan for 44FR370 (including that portion referred to as 44FR387) was filed with the FERC on June 30, 2017. VDHR concurrence is pending on the avoidance plan. Once received, Mountain Valley will file the VDHR response.
- Avoidance plans for sites 33-5403, 33-5315, 71-5488, and 80-5690 are provided as Attachments DR6 Q15a, Q15b, Q15c, and Q15d, respectively.
- Subsequent to the submittal of the *Criteria of Effects Report* (May 2017, VDHR response: July 7, 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. This revised avoidance plan for Henry-Gregory House (080-5677-0008), a contributing resource to the Bent Mountain Rural Historic District is provided as Attachment DR6 Q15e.

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Response to Section 106 Environmental Information Request
Issued by FERC August 25, 2017**

Table 15 Recommendations, SHPO Concurrence, and Dates of Filings of Avoidance Plans for West Virginia Sites Previously with the FERC					
Site	MVP Recommendation	SHPO Determination	Avoidance Plan Filed with the FERC	SHPO Concurrence	SHPO Concurrence Letter Filed with FERC
HS-897/168	Not Eligible	Not Eligible	No avoidance plan needed due to NRHP determination	10/6/2015	10/23/2015
46SU733-CEM	Not Eligible	Not Eligible	7/18/2016	8/22/2016	10/27/2016
46SU732-CEM	Not Eligible	Not Eligible	7/18/2016	8/22/2016	10/27/2016

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Date: September 5, 2017