



# COMMONWEALTH of VIRGINIA

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July 7, 2017

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

Re: *Mountain Valley Pipeline Project: Criteria of Effects Report, Giles, Craig, Montgomery, Roanoke, Franklin, and Pittsylvania Counties, Virginia* (May 2017)  
DHR File No. 2014-1194; FERC Docket No. CP16-10

Dear Ms. Neylon:

The Department of Historic Resources (DHR) has received for review and comment the study referenced above prepared by Tetra Tech for Mountain Valley Pipeline, LLC (MVP) and the Federal Energy Regulatory Commission (FERC). This document and six volumes of supporting appendices summarize the activities completed to date under the federal Section 106 review process and present an assessment of effects for those architectural properties along the 107-mile project corridor located in Virginia that are listed in, eligible for listing, or treated as eligible for listing in the National Register of Historic Places (NRHP). The FERC in its Final Environmental Impact Statement acknowledges the recommendations of this study, but withholds final comments regarding effects to architectural properties pending these comments from DHR.

In coordination with DHR, consultants from Tetra Tech developed a phased approach to evaluate potential visual effects from the MVP project on the 188 architectural properties identified as being within the project Area of Potential Effects (APE). At each successive step, Tetra Tech, in consultation with DHR, was able to eliminate from further visual effect analysis all but nine (9) historic properties. These nine historic properties are: Newport Rural Historic District (DHR ID #035-0151), Greater Newport Rural Historic District (DHR ID #035-0412), Cemetery (DHR ID #035-0412-0465; contributing resource to Greater Newport Rural Historic District), Big Stony Creek Historic District (DHR ID #035-5127), North Fork Valley Rural Historic District (DHR ID #060-0574), Barn (DHR ID #060-0574-0125; contributing resource to North Fork Valley Rural Historic District), Bent Mountain Rural Historic District (DHR ID #080-5677), Cabin (DHR ID #080-5677-0006; contributing resource to Bent Mountain Rural Historic District), and Coles-Terry Rural Historic District (DHR ID #080-5689). It should be noted that in addition to these nine resources there are 13 properties subject to effects analysis pursuant to requests from the National Park Service (NPS) and the United States Forest Service (USFS), as they fall within these two federal agencies' jurisdictions. Our understanding is that NPS and USFS will consult directly with DHR on these 13 properties.

For the final, Step 4, visual analysis Tetra Tech prepared photographic simulations at Key Observation Points (KOP) taken from the architectural properties and important publicly accessible arterial transportation routes

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within the historic districts toward the MVP corridor. The consultants then evaluated the visibility of the project from the selected KOP, taking into consideration those qualities which make each historic property significant, and interpreted the pipeline's anticipated visual impacts to those characteristics which make each historic property eligible for listing in the NRHP. After concluding its Step 4 analyses Tetra Tech recommends that the MVP project will not indirectly, through visual impacts, adversely affect the six (6) historic districts located within the APE. These recommendations are summarized in Table 4.1-5 "Task 4-Step 4 Results" on page 32, Volume 1 of the report. It must be noted that only the six historic districts are addressed in this table and, it appears, were the only properties subjected to the Step 4 evaluation. The three individual properties identified during Step 3 to be advanced to Step 4, Cemetery (DHR ID #035-0412-0465), Barn (DHR ID #060-0574-0125), and Cabin (DHR ID #080-5677-0006), were not assessed for visual effects and must be assessed using the Step 4 methodology as previously agreed upon.

Based on the submitted analyses, DHR agrees with the consultant that the expected visual (indirect) impacts from the MVP on the Newport Rural Historic District, Greater Newport Rural Historic District, Big Stony Creek Historic District, Bent Mountain Rural Historic District, and Coles-Terry Rural Historic District do not significantly diminish those characteristics which make them eligible for listing in the NRHP (direct effects to these districts are discussed below). We disagree, however, that this is the case for the North Fork Valley Rural Historic District. The photo-simulations taken from the major publicly accessible arterial transportation route at KOP NFV-01 and KOP NFV-02 clearly demonstrate that a long stretch of the MVP right-of-way will be visible as it descends a ridge line. At these KOPs an associated access road will also constitute a new and prominent feature on the historic landscape visible by those traveling along the primary roadway. We believe that the indirect visual effects of the project will significantly diminish and adversely affect the feeling and setting of the North Fork Valley Rural Historic District.

In addition to the Step 4 analysis for visual effects the document also evaluates the undertaking's direct impacts to historic properties, as well as other indirect implications, such as those caused by noise and vibration, which will occur during short-term temporary construction work and permanent operation. Thirty-three architectural properties identified within 500 feet on either side of the MVP Limit of Disturbance (LOD) centerline, or within 100 feet of the LOD for access roads, were subjected to noise and vibration analysis. This analysis determined that for only two properties, Link Farm (DHR ID #035-0412-0244; contributing resource to Greater Newport Rural Historic District) and a c.1934 Craftsman-style Bungalow (DHR ID #033-5325), did the expected noise level exceed local noise ordinances, and only during temporary access road construction. The DHR believes that any indirect impacts to historic properties due to increased noise levels will occur largely during construction activities and be temporary in nature. More at issue, however, are the short distances between Link Farm (30 feet) and 033-5325 (32 feet) to planned access roads. It is our opinion that additional study is need regarding any possible direct or visual effects from the planned access roads' on these two historic properties. Please provide site plans showing the relationship of the proposed access roads to Link Farm and 033-5325, as well as photo-simulations illustrating the appearance of the access roads from these historic properties.

With respect to vibration impacts, there are four historic properties located near areas of probable blasting. These four properties are Cemetery (DHR ID #035-0412-0465; contributing resource to Greater Newport Rural Historic District), Barn (DHR ID #060-0574-0125; contributing resource to North Fork Valley Rural Historic District), Doe Creek Farm/Hoge's Orchard (DHR ID #035-0018), and Clear View Dairy Farm (DHR ID #033-5304). If blasting is required the consultant recommends utilizing "restricted charge sizes in order to comply with the blast vibration and airblast damage limits" (Appendix K: Historic Resources Noise and Vibration Report, page 10). The DHR agrees with this recommendation. We also agree with the

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recommendations for the 11 historic properties found in Table 6: Predicted Vibration Due to General Construction Activities on page 15 of Appendix K.

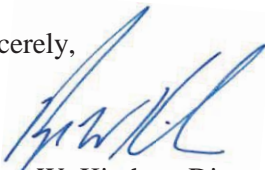
Activities associated with the routine operation of the MVP were also evaluated for their potential effects to historic properties in the APE. These operational-related activities will be limited primarily to the maintenance of the 50-foot pipeline right-of-way, and are not anticipated to pose much of a hazard to architectural properties. We agree that this is the case and believe that there is little potential for right-of-way maintenance to affect historic architectural properties.

The report's Appendix E: Master List summarizes in chart format the consultant's recommendations on the potential for the MVP project to affect historic properties within the project APE visually (Master List Part 2), by construction-related activities (Master List Part 3), and through operational-related events (Master List Part 4). The DHR, with the few exception already noted above and those that will be discussed below, concurs with the recommendations from the consultant summarized in Appendix E.

Direct effects on historic architectural properties from the MVP are confined to those historic districts through which the project crosses, namely Greater Newport Rural Historic District, Big Stony Creek Historic District, North Fork Valley Rural Historic District, Bent Mountain Rural Historic District, and Coles-Terry Rural Historic District. This list excludes the historic properties under the jurisdiction of NPS and USFS, which, as mentioned above, will be addressed separately by those agencies. It also does not include the Newport Historic District as the MVP alignment does not physically impact this resource. For the five (5) historic districts through which the pipeline crosses the consultant recommends that the undertaking will have no adverse effect. The DHR disagrees with this assessment. It is our opinion that the Greater Newport Rural Historic District, Big Stony Creek Historic District, North Fork Valley Rural Historic District, Bent Mountain Rural Historic District, and Coles-Terry Rural Historic District will be adversely affected by the MVP bisecting them and leaving a permanent fifty-foot wide imprint on their landscapes. This condition is incompatible with the existing rural character of the districts, which derive much of their historic significance and NRHP-eligible status from that very agrarian setting and feeling the undertaking will diminish. The adverse effect to the five historic districts will require mitigation to be determined through future consultation with DHR and other stakeholders and memorialized in the Programmatic Agreement (PA) for the undertaking. The PA will also address any additional cultural resource surveys and determinations of effect that may be outstanding due to pending right-of-way acquisitions.

DHR has been notified by several consulting and interested parties of their concerns regarding the validity and results of this analysis. In two instances, it is argued that line-of-sight considerations were made from incorrect locations. Others argue that the selected KOPs are insufficient to fully assess effects. We recommend that MVP and FERC review all comments received on the Criteria of Effects report and address any errors or omissions. If you have any questions regarding these comments, please do not hesitate to contact me at [roger.kirchen@dhr.virginia.gov](mailto:roger.kirchen@dhr.virginia.gov).

Sincerely,



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