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March 5, 2018

VIA ELECTRONIC FILING

Kimberley D. Bose, Secretary
Federal Energy Regulatory Commission
999 First Street NE
Washington, DC 20426

Re: Mountain Valley Pipeline, LLC (Docket No. CP16-10-00 OEP/DG2E/G3)
Comments and Objections
Re: Revised Historic Property Treatment Plan for the
North Fork Valley Rural Historic District (060-0574)

Dear Secretary Bose:

Pursuant to Stipulation III. B. 5 and IV. E of the executed Programmatic Agreement regarding the Mountain Valley Pipeline Project (MVP Project), Montgomery County hereby files comments and an objection regarding the Revised Historic Property Treatment Plan for the North Fork Valley Rural Historic Property Treatment Plan for the North Fork Valley Rural Historic District (060-0475) ("Revised Treatment Plan"). Montgomery County is a consulting party for purposes of the National Historic Preservation Act (NHPA) Section 106 process for the MVP Project.

The Virginia Department of Historic Resources (VDHR) found that the North Fork Valley Rural Historic District ("District") will be adversely affected by the Mountain Valley Pipeline Project bisecting the District and leaving a permanent fifty-foot wide imprint on the District's rural landscape. VDHR found that the permanent fifty-foot wide sway through the District is incompatible with the existing rural character of the District. The District derives much of its historic significance and eligibility status as a historic district due to its rural existence. VDHR concluded that this adverse effect on the District will require mitigation to be determined through consultation with VDHR and other stake holders.

MVP accepted VDHR's finding of an adverse effect and has proposed to mitigate that effect in a draft Treatment Plan and the Revised Treatment Plan. MVP had previously proposed in the draft Treatment Plan to address the adverse effects to the District by developing a one-hour driving tour with brochures and signage located within the District. Montgomery County provided comments on the draft Treatment Plan stating the one-hour driving tour was inadequate to mitigate and address the visual impact on the District caused by the permanent fifty-foot wide imprint on the rural landscape.

Kimberley D. Bose, Secretary
March 5, 2018
Page 2

MVP's Revised Treatment Plan proposed to provide enhanced right-of-way treatment to reduce the visibility of the maintained permanent right-of-way from locations with visibility within in the District. The Revised Treatment Plan also proposed to identify an appropriate museum, such as the Montgomery Museum or the Virginia Historical Society to partner with on a District specific history exhibit. MVP proposes to fund and manage the development of this exhibit in consultation with VHDR and the Museum with a budget not to exceed \$75,000. In addition, MVP would provide an additional \$25,000 to be administered by the Museum for the identification, digitization and preservation of District related historic materials for inclusion in the Museum exhibit design and collection.

It is Montgomery County's understanding that the Montgomery Museum has not been contacted by MVP concerning this possible partnership to administer the proposed exhibit. At a minimum, the Montgomery Museum should be consulted with prior to FERC approving this particular mitigation proposal to ensure that the Museum can and is willing to administer the exhibit and whether the proposed \$100,000 is sufficient for the Museum to do the required work in light of their current staffing and minimum funding.

Montgomery County supports the revised measure to reduce visibility of the permanently maintained right-of-way corridor. This revision is based on the County's comments on the draft Treatment Plan. While Montgomery County generally supports the preparation of a museum exhibit and the establishment of a mitigation fund for the exhibit, the Montgomery Museum should be consulted with and agree to participate prior to any approval of this mitigation measure. The Museum needs to be able to have time to comment on whether the proposed mitigation fund is sufficient enough for a quality exhibit to be created and maintained in light of Museum's current limited funding and staffing.

MVP's proposal to treat the right-of-way and create a museum exhibit is not proportional to the permanent adverse effect to the rural historic landscape of the District. In addition to treating the right-of-way and creating a museum exhibit, the adverse effects to the District's rural historic landscape can be further mitigated by restoring and preserving existing historical structures within the District. Of particular significance in the District are two mills identified as Bennetts Mill and McDonalds Mill and two historic churches situated along Catawba Road. There are also many farm structures that have significant historical importance in the District.

Montgomery County proposes that MVP create an additional mitigation compensatory fund that can be used to restore and preserve one or more of the historic structures that dot the landscape in the District. The restoration of one or more of the historic mills, churches or farming structures in the District would assist in further mitigating MVP projects adverse effects on the agrarian setting and feeling of the rural historic District. Instead of focusing on the permanent right-of-way bisecting the District, the restoring of one or more historical structures would divert attention to the positive changes in the District. Requiring MVP to provide sufficient mitigation funding to preserve and restore historical structures in the District along with the other measures proposed in the Revised Treatment Plan is much more proportional to the permanent adverse effects the pipeline is causing by bisecting this rural historic landscape.

Kimberley D. Bose, Secretary
March 5, 2018
Page 3

In conclusion, Montgomery County requests that the Commission not approve the revised Treatment Plan and instead initiate further consultation with the County, the Montgomery Museum, other stakeholders and direct MVP to undertake such consultation in order to resolve the need to provide for a more proportional approach by providing for a compensatory mitigation fund to further address the permanent adverse effects to the District.

Respectfully submitted,



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MMM/net

cc: John Eddins, Council on Historic Preservation (via e-mail)
Roger Kirchen, DHR (via e-mail)
Anita Puckett (via e-mail)
FERC Service List for CP16-10
The Honorable Board of Supervisors

Document Content(s)

NFHD Treatment Plan Comments -3-5-2018.PDF.....1-3