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March 12, 2018

Paul Friedman
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Re: Mountain Valley Pipeline, LLC
Docket No. CP16-10-000
Request for Permission regarding Cultural Resources

Dear Mr. Friedman:


Section III.B.6 of the Programmatic Agreement for the Mountain Valley Pipeline Project requires written permission from the Federal Energy Regulatory Commission to implement treatment plans. Mountain Valley Pipeline, LLC requests permission to implement treatment plans for the following resources:

- Greater Newport Rural Historic District.

If you have any questions, please do not hesitate to contact me at (412) 553-5786 or meggerding@eqt.com. Thank you.

Respectfully submitted,

MOUNTAIN VALLEY PIPELINE, LLC
by and through its operator,
EQM Gathering Opco, LLC

By: 

Matthew Eggerding
Senior Counsel, Midstream

cc: All Parties
Paul Friedman, OEP
Lavinia DiSanto, Cardno, Inc.
Doug Mooneyhan, Cardno, Inc.



COMMONWEALTH of VIRGINIA

Matt Strickler
Secretary of Natural Resources

Department of Historic Resources
2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

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March 9, 2018

Mr. Paul Friedman
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Re: *Mountain Valley Pipeline Project, Revised Historic Property Treatment Plan, Greater Newport Rural Historic District (035-0412)*
FERC Docket No. CP16-10-000; DHR File No. 2014-1194

Dear Mr. Friedman:

The Department of Historic Resources (DHR) has received the document referenced above (revised February 2018) prepared by Tetra Tech for Mountain Valley Pipeline, LLC (MVP) and the Federal Energy Regulatory Commission (FERC) in accordance with Stipulation III.B of the Programmatic Agreement (PA) executed for this project. This Treatment Plan presents those actions to be taken by MVP to minimize and mitigate the adverse effects of the project on the Greater Newport Rural Historic District (DHR ID #035-0412) in Giles County, Virginia. Specifically, the Treatment Plan proposes 1.14 miles of enhanced right-of-way revegetation and \$500,000 for the maintenance and repair of the Newport Community Center and Park (formerly Newport High School and Agricultural Building; DHR ID #065-0412-0065 & 0066).

It is our opinion that the revised Treatment Plan is reasonable in scale, proportionate to the effect, and takes into consideration previous comments from DHR, the Advisory Council on Historic Preservation, and other consulting parties. We understand that Giles County recommends that the Newport Community Center and Park Preservation Fund (Fund) be provided to and administered by Preserve Newport Historic Properties (PNHP). DHR does not object to this revision provided that PNHP agrees to abide by the terms and conditions of the Fund as presented in Attachment 3 of the Treatment Plan. DHR also acknowledges concerns expressed by the Greater Newport Rural Historic District Committee regarding inaccuracies in the mapping of the Adlai Jones Farm (DHR ID #035-0412-0010) and adjacent properties. Please see the Attachment to this letter for details of our review of this issue. To summarize, DHR recommends additional visual impacts analysis for the Adlai Jones Farm that demonstrates the effectiveness of the proposed minimization efforts.

Extensive comments on the Treatment Plan have been provided to MVP and the FERC from consulting parties and other stakeholders. We remind the FERC of its responsibility under the PA to meaningfully

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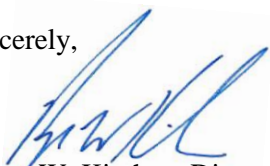
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consider all comments from consulting parties prior to approving any final Treatment Plan. Should you have any questions concerning these comments or our review of this project, please do not hesitate to contact me at roger.kirchen@dhr.virginia.gov.

Sincerely,



Roger W. Kirchen, Director
Review and Compliance Division

- c. Mr. John Eddins, ACHP
Mr. John Centofanti, MVP

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ATTACHMENT

During the cultural resources surveys completed in support of the Mountain Valley Pipeline, several contributing historic properties within the Greater Newport Rural Historic District (DHR ID #035-0412) were incorrectly mapped during the analyses (see Figure 1). These mapping errors appear to stem from a combination of consultant error and errors within DHR's digital database. Comments and recommendations for specific properties are detailed below.

The Adlai Jones Farm (DHR ID #035-0412-0010) was mapped incorrectly at 199 Leffel Lane, rather than at the correct address of 402 Steele Acres Road. This incorrect location appears first in the June 2016 *Addendum to Phase I Reconnaissance Architectural Survey for the Mountain Valley Pipeline, Craig and Giles Counties, Virginia: Supplemental Information* and in subsequent analyses and treatment plans. Consequently, there has been no formal visual impacts analysis for this property at its correct location. It appears from the route map that efforts have been taken to minimize impacts to the Farm by reducing the limits of disturbance in the vicinity of the resource. However, we recommend that a corrected impacts analysis be provided to demonstrate that these measures are sufficient to minimize the effects to this historic property.

Leffel Mansion (DHR ID #035-0412-0011) was mapped incorrectly at 119 Leffel Lane, rather than at its correct address of 199 Leffel Lane. This error likely stems from incorrect mapping in DHR's VCRIS. Given that no adverse effects were found during analysis of the property at 199 Leffel Lane, the incorrect mapping will not change our effects recommendation.

The Mason Hutchinson House (DHR ID #035-0412-0012) was mapped incorrectly at 206 Steele Acres Road, rather than at its correct address of 119 Leffel Lane. This error likely stems from incorrect mapping in DHR's VCRIS. Given that no adverse effects were found during analysis of the property at 119 Leffel Lane, the incorrect mapping will not change our effects recommendation.

Regarding the Adlai Jones Farm Road Trace (DHR ID #035-0412-0466), DHR maintains its recommendation that the resource is not an historic property. No road trace appears on USGS maps of the area dating back to 1890. Special Collections at Virginia Tech has not yet identified the "1833 Salmon Map" which is cited by Don Jones in his February 20, 2017 letter to support the inclusion of the trace as a historic road.

Document Content(s)

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