



OFFICES OF COUNTY ATTORNEY  
MONTGOMERY COUNTY

MARTIN M. McMAHON, COUNTY ATTORNEY

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March 23, 2018

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

Re: Mountain Valley Pipeline, LLC  
Docket No. CP16-10-000 OEP/DGZE 63  
Comments and Objections - Work Plan and Schedule for  
the North Fork Valley Historic District

Dear Secretary Bose:

Pursuant to the County of Montgomery, Virginia status as a consulting party for purposes of the National Historic Preservation Act (NHPA), Section 106 process for the Mountain Valley Pipeline Project (MVP Project) Montgomery County hereby files comments and an objection regarding the Work plan and schedule for the North Fork Valley Rural Historic District (the "District").

MVP proposes to fund and manage the development of a North Fork Valley Rural Historic District specific museum exhibit ("District Specific Exhibit") in partnership with a museum partner such as the Montgomery Museum ("Museum") in Christiansburg as a proposed mitigation to address adverse effects from the visibility of a permanent pipeline right-of-way visible within the District. It is the County's understanding from talking with the Museum that the Museum has had no substantive discussions to date with MVP concerning the proposed museum exhibit mitigation plan. One need to just look at the correspondence to date that was attached to the Summary, Work Plan and Schedule submitted by MVP between MVP and the Montgomery Museum. There is nothing of substance in any of the correspondence between the Museum and MVP other than MVP has offered \$25,000 and they want the Museum to consider being the host for the exhibit.

The County in its previous comments filed advised FERC that the Montgomery Museum has very limited funding, exhibit space and human resources. The Montgomery Museum on March 7, 2018 sent MVP a letter by way of EQT advising them of this fact. The Museum also advised MVP that an alternative plan needs to be developed because the money dedicated for this project is unlikely to cover the needed staff, equipment and long term management required for such an exhibit. To date MVP has ignored the Museum's comments. Based on the attached correspondence between MVP and the Museum, MVP did not share this correspondence with FERC. I am attaching a copy of the March 7, 2018, letter from the Museum so that FERC will be fully informed of the Montgomery Museum's concerns.

Kimberly D. Bose, Secretary

March 23, 2018

Page 2

Montgomery County requests that the Commission review the March 7, 2018 letter from the Montgomery Museum to MVP in order to see that the plan being proposed by MVP to create a District Specific Museum exhibit is impossible as presently proposed. The County asks that the Commission not approve the proposed Work Plan and Scheduled Treatment Plan and instead require MVP to undertake further consultation in order to resolve the need to provide a realistic approach to address the District Specific Exhibit proposal.

Respectfully submitted,



Martin M. McMahon,  
County Attorney

Attachment – (Montgomery Museum letter dated 7 March 2018)

cc: John Edins, Advisory County for Historic Preservation  
Roger Kirchen, Virginia Department of Historic Resources  
Anita Puckett, Preserve Montgomery County, VA  
Sue Farrar, Montgomery Museum  
FERC Service List



300 S. Pepper Street Christiansburg, VA 24073  
540-382-5644 www.montgomerymuseum.org

7 March 2018

Mr. John J. Centofanti  
Corporate Director, Environmental Affairs  
EQT Corporation  
625 Liberty Avenue, Suite 1700  
Pittsburgh, PA 15222

RE: Revised Historic Property Treatment Plan  
North Fork Valley Rural Historic District (060-0574)  
Mountain Valley Pipeline Project  
FERC Docket No. CP16-10  
DHR File #2014 1194

Dear Mr. Centofanti:

We appreciate your recent calls to the Montgomery Museum and Lewis Miller Art Center regarding your proposed Montgomery Museum projects as required mitigation for the North Fork Valley Rural Historic District (“the District”) under Section 106 of the National Historic Preservation Act for the Mountain Valley Pipeline (MVP) project. We are deeply aware of the historic and scenic significance of the District and the need to preserve its agricultural and historic resources to the fullest. However, the Montgomery Museum is a small institution with limited space, budget, and human resources. These facts have led to the concerns listed below regarding the feasibility of the project.

Our concerns are

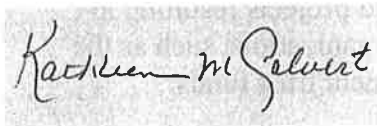
1. We’re unclear as to what is meant by the statement that Mountain Valley Pipeline will “manage the development of this exhibit” (section 4.3.2; p. 12)? Does this mean payment for any aspect of the project will be approved by MVP? If so, then certain conflict of interest issues arise regarding how stakeholders and consulting parties on the project interpret the proposed alteration of the viewshed and possible other impacts via construction activities. It has been our experience that funded projects resulting in museum exhibits are managed by independent agencies or organizations such as the National Endowment for the Humanities or through independent trust funds.
2. The historic significance and integrity of the North Fork Valley Historic District is such that it warrants the convening of a much larger coalition of stakeholders and institutions than the Montgomery Museum alone. The Museum suggests the convening of a group with representatives from the North Fork community, the Virginia Tech Appalachian Studies Program and its Material Culture and Public Humanities Masters Program in the Department of Religion and Culture, and the Radford University Appalachian Regional

and Rural Studies Center. Clearly, it would take time to organize this coalition into an integrated and functioning constituency so as to prepare an historically accurate exhibit.

3. The quoted statement in 3. (Section 4.3.2; p. 12) that MVP will work with “the partner museum’s exhibit designer and collections manager” also requires refinement. The Montgomery Museum is a small institution with limited staff resources. Our curator (who serves as both collections manager and exhibit designer) would not be able to staff this project appropriately. The \$25,000 proposed by MVP is highly unlikely to cover the costs of hiring additional staff to complete the digital collection and exhibit work.
4. The Revised Treatment Plan also states that MVP will provide \$25,000 for “identification, digitization, and preservation of district-related historic material for inclusion in the *Montgomery County Memory Project* (Section 4.3.2; p. 12). This project has Internet technical limitations and was designed for digital representation of household artifacts, not large buildings, barns, gristmills, and other structures. The equipment and skill needed to go on site and digitally photograph and then digitally preserve these buildings is not within the purview of this project. Furthermore, the size of the *Memory Project* website is limited unless we incur a permanent annual fee charged to the Museum. The \$25,000 proposed by MVP is unlikely to cover the additional staff, equipment, and *long-term* management of such a virtual exhibit. Therefore an alternative plan must be developed.
5. The time frame of the project is very unclear. Because the Museum is a small institution with limited staff resources, and because we assert that other stakeholders need to have the opportunity to provide input into the collection of digital resources and the design process, we feel that a generous allotment of time and significant increase in monetary resources would be necessary to complete the project, far past the anticipated pipeline operation date of late 2018 or early 2019.
6. Finally, any decision regarding the Museum’s involvement in the project must be approved by its Board, which meets on the second Thursday of each month.

We appreciate your interest in the Montgomery Museum.

Sincerely,

A handwritten signature in cursive script that reads "Kathy Calvert". The signature is written in dark ink on a light-colored, slightly textured background.

Ms. Kathy Calvert, Board President  
Montgomery Museum and Lewis Miller Art Center

CC:

Paul Freidman, Federal Energy Regulatory Commission

Roger Kirchen, Virginia Department of Historic Resources  
Mike Pulice, Salem District Office, Virginia Department of Historic Resources  
Sherry Wyatt, Curator, Montgomery Museum and Lewis Miller Art Center  
Craig Meadows, County Administrator, Montgomery County, Virginia  
Martin McMahon, Montgomery County, Virginia, County Attorney  
Chris Tuck, Chair, Montgomery County, Virginia, Board of Supervisors  
John Edins, Advisory Council for Historic Preservation  
Betsy Merritt, National Trust for Historic Preservation  
Ann Rogers, Preserve Roanoke and Blue Ridge Environmental Defense League  
Anita Puckett, Preserve Montgomery County, VA and Director, Virginia Tech Appalachian Studies Program  
Theresa Burriss, Director, Radford University Appalachian Regional and Rural Studies Center  
Chris Hurst, Virginia House of Delegates, 12<sup>th</sup> District  
John Edwards, Virginia Senator, 21<sup>st</sup> District  
Mark Warner, Virginia United States Senator  
Tim Kaine, Virginia United States Senator

Document Content(s)

MontMuseumltr3-23-18.PDF.....1-5