

Neylon, Megan

From: Neylon, Megan
Sent: Friday, September 22, 2017 1:21 PM
To: 'Schaefer, Mitchell K'
Cc: Evelyn Tidlow; Dye, Hannah (Hannah.Dye@tetrattech.com); Hoover, Matthew S.
Subject: Losch Farmstead
Attachments: MVP_WV COE_ Treatment Plan_Losch Farmstead 09142017 revised 9222017.pdf; Braxton Co Proposed Timber Area(1).pdf; BX-0351_RESURVEY.PDF

Hi Mitch,

While corresponding with Shirley Nelson, a landowner of the Losch Farmstead, regarding the Treatment Plan that was sent to you on September 15, 2017, it came to our attention that it would be more appropriate to refer to the property as the Cunningham Farmstead. The Cunningham family were the original owners of the property and the current owners are descendants of the Cunninghams. The attached HPI form has been updated to reflect the property's historic name and includes a statement regarding the timbering in the setting description field. In addition, recent photographs of the timbering on the property have been added to the HPI form's photograph continuation sheets. Also attached is an updated copy of the Treatment Plan. The only thing that has changed in the Plan is the name of the farm.

Finally, during our conference call on September 6, 2017, we discussed that the farmstead is currently being timbered. Based on the information that we acquired from MW Logging, the intent is to log the entirety of the area shown orange on the attached map. All timber 18 inches in diameter or greater will be removed by the end of 2019 (at the latest). In addition, MW Logging is currently expanding and utilizing the access road shown on the map as MVP-BR-090.01.

Please let me know if you have any questions or need additional information.


Thank you,

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Supervisor - Permitting
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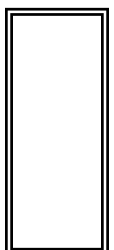


Internal Rating: _____

WEST VIRGINIA HISTORIC PROPERTY INVENTORY FORM

Street Address	Common/Historic Name/Both	Field Survey #	Site # (SHPO Only)
Town or Community	County	Negative No.	NR Listed Date
Architect/Builder	Date of Construction	Style	
Exterior Siding/Materials	Roofing Material	Foundation	
Property Use or Function Residence <input type="radio"/> Commercial <input type="radio"/> Other <input type="radio"/>	UTM#		
Survey Organization & Date	Quadrangle Name		
	Part of What Survey/FR#		

Sketch Map of Property
Or Attach Copy of USGS Map



Site No.

Present Owners Phone #	Owners Mailing Address								
Describe Setting <div style="text-align: right;"> _____ Acres _____ Archaeological Artifacts Present </div>									
Description of Building or Site (Original and Present) <div style="text-align: right;"> _____ Stories _____ Front Bays </div> <div style="text-align: right; margin-top: 10px;"> <i>(Use Continuation Sheets)</i> </div>									
<table style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 20%; text-align: left;">Alterations</th> <th style="width: 10%;"></th> <th style="width: 10%; text-align: left;">If yes, describe</th> </tr> <tr> <td style="text-align: center;">Yes No</td> <td></td> <td></td> </tr> </table>		Alterations		If yes, describe	Yes No				
Alterations		If yes, describe							
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<table style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 20%; text-align: left;">Additions</th> <th style="width: 10%;"></th> <th style="width: 10%; text-align: left;">If yes, describe</th> </tr> <tr> <td style="text-align: center;">Yes No</td> <td></td> <td></td> </tr> </table>		Additions		If yes, describe	Yes No				
Additions		If yes, describe							
Yes No									
Describe All Outbuildings <div style="text-align: right; margin-top: 10px;"> <i>(Use Continuation Sheets)</i> </div>									
Statement of Significance <div style="text-align: right; margin-top: 10px;"> <i>(Use Continuation Sheets)</i> </div>									
Bibliographical References <div style="text-align: right; margin-top: 10px;"> <i>(Use Continuation Sheets)</i> </div>									
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;"> Form Prepared By: Hannah L. Dye, MA, Architectural Historian </td> <td style="width: 40%;"> Date: </td> </tr> <tr> <td colspan="2" style="padding-top: 10px;"> Name/Organization: </td> </tr> <tr> <td colspan="2" style="padding-top: 10px;"> Address: </td> </tr> <tr> <td colspan="2" style="padding-top: 10px;"> Phone #: </td> </tr> </table>		Form Prepared By: Hannah L. Dye, MA, Architectural Historian	Date:	Name/Organization:		Address:		Phone #:	
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West Virginia Division of Culture and History
 State Historic Preservation Office

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WEST VIRGINIA HISTORIC PROPERTY FORM

CONTINUATION SHEET

NAME _____ SITE# _____

Description of building or site:

This _____, _____-story, _____ bay _____ is located on _____
in the vicinity of _____ in Tucker County. The building is constructed on a _____
and stands on a _____ foundation. The exterior walls are clad in _____ ;
the _____ roof is covered in _____. The fenestration consists primarily of _____
sash windows.

Description of outbuildings:

This property contains _____ outbuildings including:

Statement of Significance:

WEST VIRGINIA HISTORIC PROPERTY FORM

CONTINUATION SHEET

NAME _____ SITE# _____

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WEST VIRGINIA HISTORIC PROPERTY FORM CONTINUATION SHEET

NAME Losch/Cunningham Farmstead

SITE#



Photograph 1: Losch/Cunningham Farmstead, Farmhouse, View NW



Photograph 2: Losch/Cunningham Farmstead, Farmhouse, View NE

WEST VIRGINIA HISTORIC PROPERTY FORM CONTINUATION SHEET

NAME Losch/Cunningham Farmstead

SITE#



Photograph 3: Losch/Cunningham Farmstead, Farmhouse, View SE



Photograph 4: Losch/Cunningham
Farmstead, Root cellar,
View NW

WEST VIRGINIA HISTORIC PROPERTY FORM CONTINUATION SHEET

NAME Losch/Cunningham Farmstead

SITE#



Photograph 5: Losch/Cunningham Farmstead, Root cellar, View E



Photograph 6: Losch/Cunningham Farmstead, Pigsty, View E

WEST VIRGINIA HISTORIC PROPERTY FORM CONTINUATION SHEET

NAME Losch/Cunningham Farmstead

SITE#



Photograph 7: Losch/Cunningham Farmstead, Privy, View SE

WEST VIRGINIA HISTORIC PROPERTY FORM CONTINUATION SHEET

NAME Losch/Cunningham Farmstead

SITE#



Photograph 8: Losch/Cunningham Farmstead, Privy, View SE

WEST VIRGINIA HISTORIC PROPERTY FORM

CONTINUATION SHEET

NAME Losch/Cunningham Farmstead

SITE#



Photograph 9: Losch/Cunningham Farmstead, Corn crib, View N

WEST VIRGINIA HISTORIC PROPERTY FORM CONTINUATION SHEET

NAME Losch/Cunningham Farmstead

SITE# BX-0351



Photograph 10. Losch/Cunningham Farmstead (BX-0351), Barn and logging road and timbering operations, View E



Photograph 11. Losch/Cunningham Farmstead (BX-0351), Farmhouse and root cellar (left) and logging road, View NE

**WEST VIRGINIA HISTORIC PROPERTY FORM
CONTINUATION SHEET**

NAME Losch/Cunningham Farmstead

SITE# BX-0351



Photograph 12. Losch/Cunningham Farmstead (BX-0351), logging roads, View NE



Photograph 13. Losch/Cunningham Farmstead (BX-0351), logging roads, View NE

**WEST VIRGINIA HISTORIC PROPERTY FORM
CONTINUATION SHEET**

NAME Losch/Cunningham Farmstead

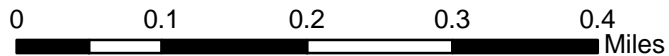
SITE# BX-0351



Photograph 14. Losch/Cunningham Farmstead (BX-0351), Barn, logging road and timbering operations, View E



Proposed Timber Area



9/21/2017

LEGEND

- MVP Route
- MVP Access Road
- Proposed Timber Area
- Cultural Sites
- MVP Temporary Work Space
- MVP Additional Temporary Work Space

MOUNTAIN VALLEY PIPELINE PROJECT

**REVISED
HISTORIC PROPERTY TREATMENT PLAN
Cunningham Farmstead
(Losch Farmstead BX-0351)**

**DOCKET NO. CP16-10
WVDCH FILE #15-67-MULTI**

Prepared for



**555 Southpointe Boulevard
Canonsburg, Pennsylvania 15317**

Prepared by



**661 Andersen Drive
Foster Plaza
Pittsburgh, PA 15220**

**Revised
September 2017**

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FIGURES

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Figure 3-1	Location of Cunningham Farmstead (Losch Farmstead - BX-0351) and Proposed Tree-Clearing (Aerial)
Figure 3-2	Location of Cunningham Farmstead (Losch Farmstead - BX-0351) and Proposed Tree-Clearing (Topo)

ATTACHMENTS

Attachment 1	Photo Simulation
Attachment 2	Correspondence

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1.0 INTRODUCTION

1.1 Project Overview

Mountain Valley Pipeline, LLC (Mountain Valley), a joint venture between affiliates of EQT Midstream Partners, LP, NextEra Energy, Inc., Con Edison Gas Midstream, LLC, WGL Holdings, Inc., and RGC Midstream, LLC, is seeking a Certificate of Public Convenience and Necessity (Certificate) from the Federal Energy Regulatory Commission (FERC) pursuant to Section 7(c) of the Natural Gas Act authorizing it to construct and operate the proposed Mountain Valley Pipeline Project located in 17 counties in West Virginia and Virginia. Mountain Valley plans to construct an approximately 303-mile, 42-inch-diameter natural gas pipeline to provide timely, cost-effective access to the growing demand for natural gas for use by local distribution companies, industrial users and power generation in the Mid-Atlantic and southeastern markets, as well as potential markets in the Appalachian region. The proposed pipeline will extend from the existing Equitrans, L.P. transmission system and other natural gas facilities in Wetzel County, West Virginia to Transcontinental Gas Pipe Line Company, LLC's Zone 5 compressor station 165 in Pittsylvania County, Virginia.

The FERC is the lead federal agency for compliance with the National Environmental Policy Act and Section 106 of the National Historic Preservation Act (NHPA) for this undertaking. As a result, the FERC directed Mountain Valley to coordinate with the West Virginia Division of Culture and History-Historic Preservation Unit (WVDCH), which serves as the State Historic Preservation Office (SHPO), following the FERC guidelines related to cultural resources compliance with Section 106 on FERC-regulated projects. Following submittal of the *Criteria of Effects Report* for the project, WVDCH issued its opinion in a letter dated August 3, 2017, that the proposed project will adversely affect the Cunningham Farmstead (Losch Farmstead - BX-0351; see section 4.2 for an explanation on the name change incorporated into this Treatment Plan), a historic resource determined eligible for the National Register of Historic Places (NRHP). The FERC is consulting with the WVDCH on the treatment of historic properties that will be adversely impacted by the proposed project. This Treatment Plan has been developed to document Mountain Valley's efforts to coordinate with consulting parties and other stakeholders to identify mitigation measures appropriate to address the proposed project's potential adverse effects to the Cunningham Farmstead (Losch Farmstead). This Treatment Plan also proposes mitigation measures designed to mitigate the adverse effects of the project.

Mountain Valley developed the direct and indirect Area of Potential Effect (APE) through consultation with the WVDCH. The APE for direct effects for the MVP Project comprised a 91.46-meter (300-foot) corridor centered on the proposed pipeline or 45.7 meters (150 feet) on either side of the pipe centerline. The direct APE also includes the limits of ground disturbance for any ancillary facilities necessary to construct, operate, and maintain the pipeline. Ancillary facilities include compressor stations, access roads, construction staging areas, and temporary workspaces. For access roads, the direct APE was defined as a 30.5-meter (100-foot) corridor centered on the proposed access road or 15.2 meters (50 feet) on either side of the proposed road centerline. The APE for indirect effects accounted for the visual impacts of the Project, not only for aboveground

Project facilities such as compressor stations, but also for the 15.2-meter (50-foot) corridor (permanent right-of-way) that will remain after construction to service and maintain the pipeline. The indirect APE was defined as 0.4 kilometers (0.25 miles) on either side of the proposed pipe centerline and a 0.8-kilometer (0.5-mile) radius around the limits of ground disturbance for each compressor station.

Mountain Valley's cultural resources consultants identified the Cunningham Farmstead (Losch Farmstead - BX-0351) in Braxton County during the Phase I historic architecture survey conducted in August 2016.

1.2 Project Effect

In accordance with Section 106 of the NHPA of 1966, as amended, Mountain Valley applied the Criteria of Adverse Effect to the Cunningham Farmstead (Losch Farmstead).

As noted in Section 4.2 of Mountain Valley's *Criteria of Effects Report* (February 2017), the project will include a permanent access road and permanent easement within the historic property boundary. These plans include the use of an existing access road, which currently dissects the farmstead, adjusted slightly to maintain a minimum distance of 15 feet from all buildings and structures to avoid any impacts on these resources. The access road will be extended to the east through the historic property boundary in an area that, according to historic aerial photographs, formerly served as a tractor path or farm road. These plans also include the construction of the pipeline, in a north-south direction, through the eastern portion of the Cunningham Farmstead (Losch Farmstead) historic property boundary. Mountain Valley acknowledged that construction activity will result in changes to the resource's landscape; however, it was recommended that this will not change aspects of the property's integrity that contribute to its significance. Mountain Valley noted that a review of historic aerial photography indicates that while the surrounding land is historically tied to the farmstead, the landscape lacks integrity and no longer contributes to the historic significance of the resource. Due to new-growth trees and vegetation that currently predominates the landscape, Mountain Valley recommended that the farm no longer maintains its historic agricultural landscape features (i.e. pasture land, crop fields, field divisions, wind breaks, tractor paths, etc.) that are evident in historic aerial photography. The farmstead conveys its significance through its intact assemblage of historic agricultural and domestic buildings, direct impacts on which will be avoided by the project, and does not derive its significance from the surrounding landscape. Furthermore, photograph simulations depicting views from the Cunningham Farmstead (Losch Farmstead) towards the project indicate that visual impacts will be inferior (Attachment 1). Following careful study of the project and its relationship to the historic property, Mountain Valley recommended that the proposed undertaking would have no effect on the Cunningham Farmstead (Losch Farmstead).

WVDCH found, in a letter dated August 3, 2017, that:

Based on the submitted effects report, the pipeline and necessary access roads will cross the immediate property. Thus, planned tree clearance and permanent right-of-way areas will permanently alter the farmstead's setting. Though indirect effects on the property's

main buildings will be minimal, it is our opinion the proposed work will adversely affect the Losch Farmstead...We request you evaluate alternatives for the undertaking to avoid or minimize those effects and then inform us of such.

2.0 CUNNINGHAM FARMSTEAD (LOSCH FARMSTEAD) SETTING AND ASSOCIATION

During Phase I survey, Mountain Valley's cultural resources consultant recommended the Cunningham Farmstead (Losch Farmstead) as eligible under both Criterion A and Criterion C.

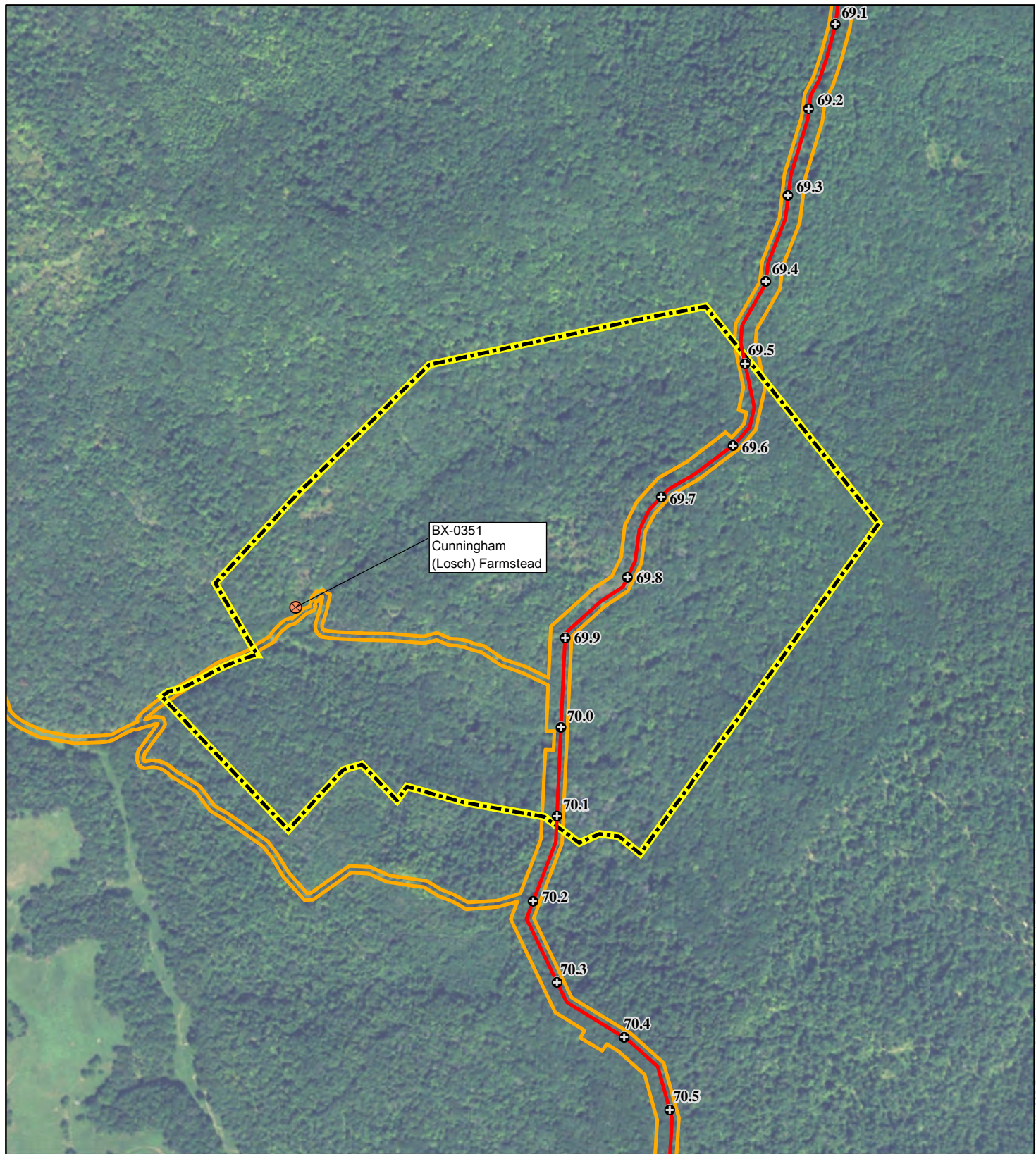
The extant resources currently contained within the Cunningham Farmstead (Losch Farmstead) likely reflect only a portion of those that comprised the farmstead at the turn-of-the-century. However, the extant farmhouse and associated outbuildings do convey their original function and purpose and demonstrate the spatial planning of small, early-twentieth century farms in Braxton County. Therefore, it was recommended that this resource is eligible for NRHP listing under Criterion A. Coupled with the collection of relatively well-preserved and unaltered outbuildings, the deteriorated farmhouse provides architectural context for this early-twentieth century Braxton County farm. As a result, this farmstead was recommended eligible for NRHP listing under Criterion C. The proposed period of significance spans the construction dates of the farmhouse and outbuildings, circa-1890 to circa-1960. The proposed NRHP boundary for this farmstead is the current tax parcel boundary, which encompasses the surrounding land that was historically associated with the resource. The WVDCH concurred with this eligibility recommendation and boundary definition in a letters dated December 8, 2016, and August 3, 2017. The boundary is depicted in Figure 2-1.

The unoccupied Cunningham Farmstead (Losch Farmstead) is sited in a hollow at the eastern terminus of County Road (CR) 4/4 (Little Krawl Creek Road), approximately 0.5 mile west of the road's intersection with CR 19/12 Millstone Run Road in the vicinity of Napier. The farmstead comprises a circa-1890 farmhouse and five outbuildings: a circa-1890 root cellar, a circa-1910 pigsty, a circa-1890 barn, a circa-1960 privy, and a circa-1935 corn crib. The Cunningham (Losch) farmhouse is a two-story, five-bay farmhouse constructed in the I-house form and stands on a stone pier foundation (Photo 2-1). The exterior walls of the building are clad in wood lap siding. The house's side gable roof is covered in standing seam metal; fenestration consists of 2/2 double hung, wood sash windows. The window and door configurations on the lower and upper stories suggest that a two-story, open-air porch originally extended the full-length of the facade, but is no longer intact. Two five-panel wood entry doors are accented by transoms (glass no longer intact). A single-story kitchen ell extends from the rear elevation forming an L plan. The ell is also sided in wood lap siding; its gable roof is covered in standing seam metal. An open-air, shed-roofed porch extends the length of the kitchen ell's rear elevation.



Photo 2-1. Cunningham Farmstead (Losch Farmstead - BX-0351), Braxton County, View NW

A circa-1890 front gable, wood frame root cellar stands approximately 15 feet north of the farmhouse and sits on a cut stone foundation. The exterior walls are clad in board and batten wood siding. The building's front gable roof is covered in standing seam metal. Located approximately 50 feet east of the farmhouse is a circa-1910 wood frame pigsty. The building's gabled roof is covered in corrugated metal and its exterior walls are clad in vertical wood boards. A circa-1935 front gable, wood frame corn crib stands approximately 125 feet east of the pigsty. The building's front gable is covered in corrugated metal. A circa-1960 shed roof, wood frame privy is sited approximately 75 feet southeast of the pigsty. The building's exterior is clad in board and batten siding; the shed roof is covered in corrugated metal. A circa-1890, front gable, one-and-a-half-story timber frame barn is sited approximately 250 feet southwest of the farmhouse at the base of the driveway along CR 4/4. The barn's exterior is clad in wood clapboard siding—missing boards reveal that the half-story served as a hay loft. The front gable roof is covered in standing seam metal; a metal ventilator pierces the roof's ridge line at its mid-point. Window openings along the eaves sides indicate the lower story served as animal housing.



Mountain Valley Pipeline Project



NAD 1983 UTM 17N

0 100 200 400 Meters



Figure 2-1
NRHP Boundary:
Cunningham (Losch) Farmstead
(BX-0351)

September 2017

Data Sources: NRHP, ESRI Streaming Data, 2015

Legend

Historic Resource

- Eligible: Criteria A and C
- Milepost
- Proposed Route
- NRHP Boundary
- Limits of Disturbance



3.0 DESCRIPTION OF MOUNTAIN VALLEY AS IT AFFECTS PROPERTY SETTING AND ASSOCIATION

Mountain Valley proposes to cross the Cunningham Farmstead (Losch Farmstead) at approximate milepost 69.9 of the project, for a distance of 3,288 feet. Construction of the belowground pipeline will include short-term, long-term, and permanent impacts on the existing vegetation cover types.¹ Portions of the proposed project's permanent easement located in forested areas will result in tree-clearing and could result in changes to the setting of the property (Figures 3-1 and 3-2). Effects related to vegetation removal within the historic property boundary were among several issues that were the focus of consultation discussions with WVDCH and stakeholders.

The Cunningham Farmstead (Losch Farmstead) is sited in a hollow surrounded by steep, wooded slopes to the north, east, and south. Of the 3,288 feet of the pipeline within the Cunningham Farmstead (Losch Farmstead) historic property boundary, the permanent pipeline right-of-way will not be visible from the farmstead's contributing historic resources (Attachment 1). To the extent possible, Mountain Valley will utilize the Cunningham Farmstead's (Losch Farmstead's) existing road to minimize clearing. This will minimize impacts on vegetation by reducing trampling, compaction, land use change, tree clearing, and stump removal activities. The areas disturbed by construction will be restored to their original grades, condition and use or better, to the greatest extent practicable, in accordance with the Erosion and Sediment Control Plan approved by the West Virginia Department of Environmental Protection (DEP). Cleared vegetation in non-forested areas will be restored using DEP-approved native seed mixes.

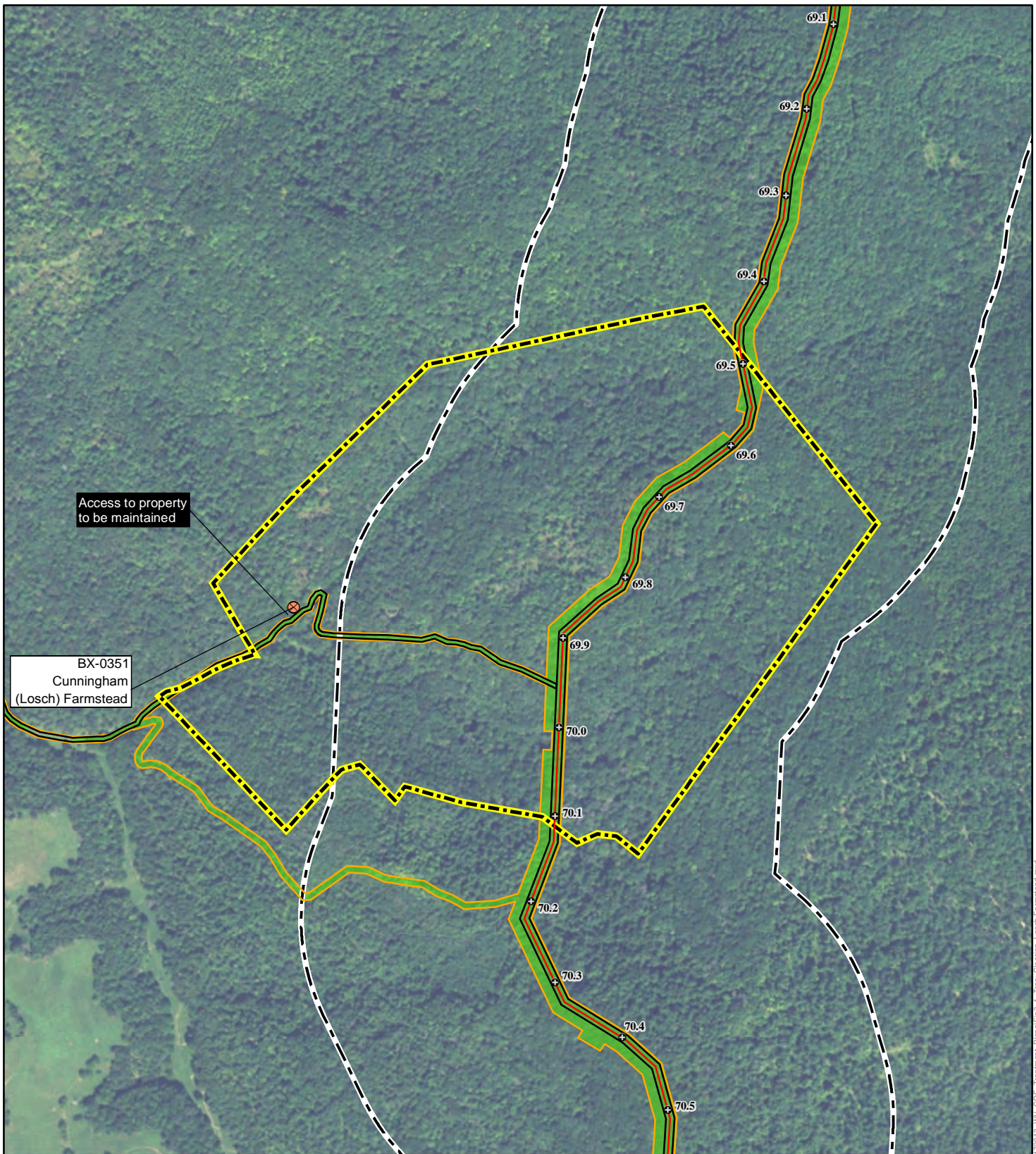
Vegetation removal for Mountain Valley has been minimized to the greatest practicable extent. However, the WVDCH concluded that project-related disturbances resulting from tree-clearing in right-of-way within the historic property boundary will affect the integrity of the property's setting and, as a result, requires treatment.

4.0 MITIGATION OF ADVERSE EFFECTS IDENTIFIED

4.1 Approach to Development of Mitigation

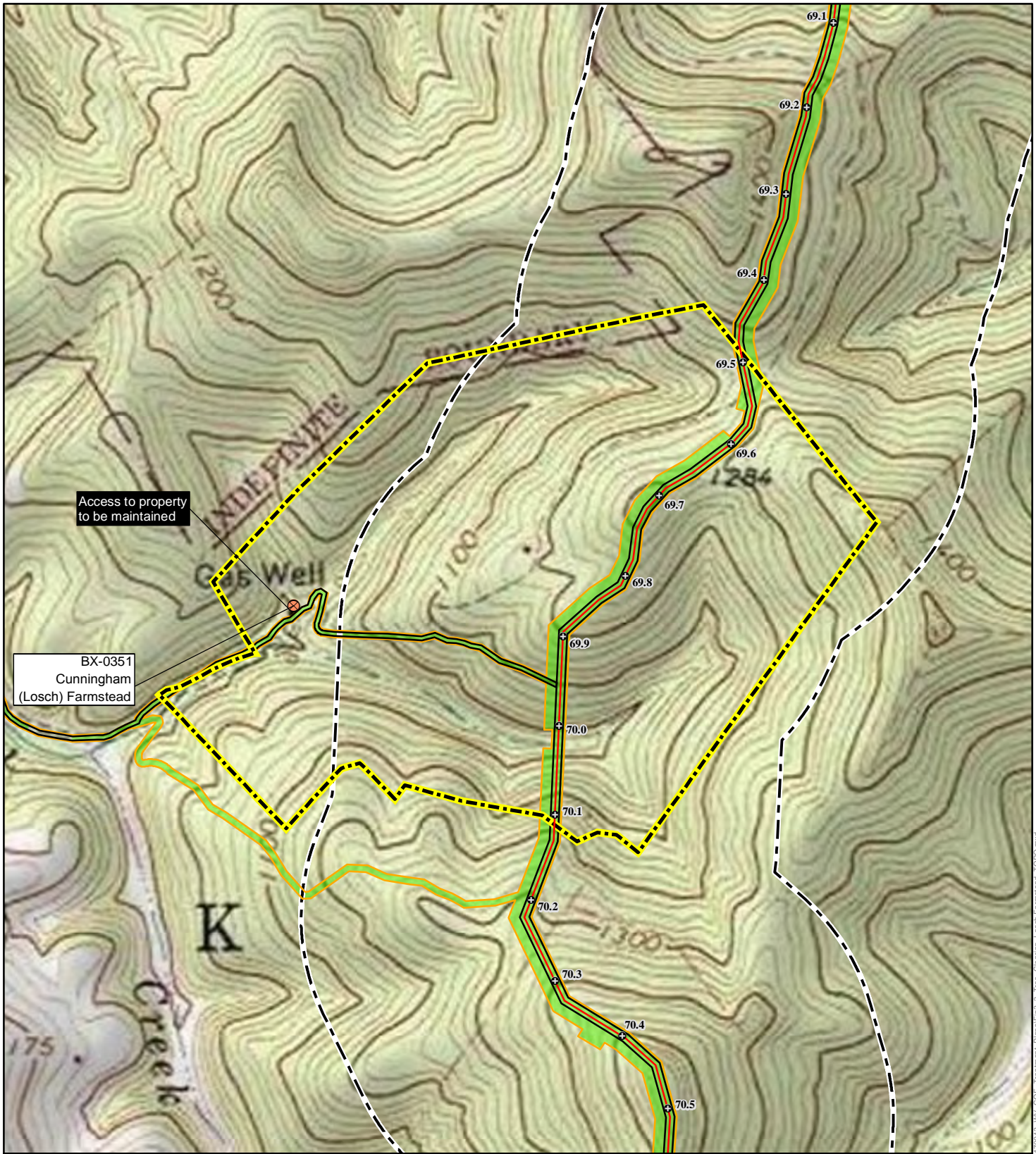
Mountain Valley's selection of appropriate mitigation is guided by three principles: it should (1) have a nexus to the identified adverse effects of the proposed action, (2) be proportional to those effects, and (3) take consideration of the input of consulting parties and local stakeholders. The adverse effect to be mitigated for the Cunningham Farmstead (Losch Farmstead) is, according to WVDCH, the permanent alteration to the farmstead's setting as a result of "planned tree clearance and permanent right-of-way areas." To further clarify this effect and assess its magnitude, it is important to note that WVDCH specifically stated that "indirect effects on the property's main buildings will be minimal." As previously noted, aboveground impacts from this buried natural gas pipeline will be imperceptible due to distance and the screening provided by surrounding topography and vegetation. (Figures 3-1 and 3-2, and Attachment 1).

¹ No aboveground project facilities are proposed within the property's recommended NRHP boundary, or within the property's viewshed



Mountain Valley Pipeline Project		NAD 1983 UTM 17N	0 300 600 1,200 Feet
 Figure 3-1 Proposed Tree-Clearing Losch Farmstead (BX-0351) September 2017	Legend <ul style="list-style-type: none"> Milepost Proposed Route NRHP Boundary Permanent Easement Limits of Disturbance Proposed Route Indirect APE Tree Clearing Area 		
	Data Sources: ESRI Streaming Data, 2015		

Document Path: P:\EQI\EquiansMVP_P\ProjectGIS\SpatialMXD\02_Cultural\0313_VW_COE_TreatmentPlans\Fig3_1_Proposed_Tree_Clearing_Losch_Farmstead.mxd



<p>Mountain Valley Pipeline Project</p> <p>Mountain Valley PIPELINE</p> <p>Figure 3-2 Proposed Tree-Clearing Cunningham (Losch) Farmstead (BX-0351)</p> <p>September 2017</p> <p>Data Sources: ESRI Streaming Data, 2015</p>		<p>NAD 1983 UTM 17N</p> <p>0 300 600 1,200 Feet</p> <p>Legend</p> <ul style="list-style-type: none"> Milepost Proposed Route NRHP Boundary Permanent Easement Limits of Disturbance Proposed Route Indirect APE Tree Clearing Area 	
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Permanent impacts on the portions of the landscape not devoted to agriculture, and not in forest, will be avoided and/or minimized by the restoration of the pre-existing contours of the temporary and permanent rights-of-way and revegetation with native seed mixes. Lastly, there will be no aboveground project facilities placed on the landscape within the historic property boundary or within the property's viewshed. In light of the largely indiscernible indirect impacts on the physical landscape, additional changes to project construction or restoration practices will not effectively ameliorate the adverse effect identified by WVDCH on the property's setting.

Mountain Valley has identified a mitigation measure—the preparation of a multimedia intensive-level documentation of the Cunningham Farmstead (Losch Farmstead)—that directly addresses the potential adverse effect identified by WVDCH to the “setting” of this property for its owners by recording and preserving its historic and cultural significance (including aspects of integrity). This approach is proportional to the long-term physical adverse effect to the historic property. It is also responsive to stakeholder concerns regarding the poorly preserved and rapidly-deteriorating condition of the unoccupied farmstead and addresses the anecdotal significance of this farmstead, which serves to anchor a large and dispersed family.

4.2 Consultation with Consulting Parties and Other Stakeholders

Mountain Valley assisted the FERC with outreach to consulting parties and other stakeholders to identify appropriate mitigation measures for the adverse impacts on the Cunningham Farmstead (Losch Farmstead). Mountain Valley contacted all five owners of the Cunningham Farmstead (Losch Farmstead)—Elizabeth Losch, Gail Losch, Barbara Nickell, Shirley Nelson, Michael Losch—and held a telephone meeting on September 11, 2017. Mountain Valley provided each landowner a copy of the proposed treatment plan on September 15, 2017. In a follow-up call, Shirley Nelson requested that Mountain Valley refer to the property as the Cunningham Farmstead since her family ancestors who originally owned the farmstead were the Cunningham family. Mountain Valley's consultants previously referred to the property as the “Losch Farmstead” because it is currently owned by several members of the Losch family. Ms. Nelson also indicated that, with the name change, the Treatment Plan was acceptable. Appendix A contains copies of telephone records and meeting minutes that document the discussions with the stakeholders.

4.3 Proposed Mitigation Plan

In the September 11, 2017, meeting, stakeholders stated their plans to timber approximately 250 acres of the farm property in quadrants over the next three years, noting that these activities were currently underway. They indicated that this timbering would occur in areas that Mountain Valley proposes to temporarily and permanently utilize as well areas of the property unaffected by the project. Furthermore, the stakeholders stated that despite any efforts on behalf of Mountain Valley to reduce and minimize tree-clearing, the property owners would be timbering in those areas of the property regardless. The property owners voiced concerns regarding the poor condition of the buildings due to deferred maintenance, deterioration, and neglect and expressed a desire to capture, collect, and share historical information regarding the property with their descendants. As a result, the proposed mitigation plan has been focused less on physical preservation of the property's

setting and more on preservation through documentation. Mountain Valley’s proposed mitigation plan to address potential adverse effects is to prepare, in collaboration with participating stakeholders, a multimedia documentation of the Cunningham Farmstead (Losch Farmstead) using a combination of text, photography, video and audio.

Mountain Valley will work with the WVDCH to finalize the scope for the documentation package; however, based on previous consultation with the stakeholders, Mountain Valley proposes that the illustrated, printed and bound publication—prepared by a historian or architectural historian meeting the Secretary of the Interior’s *Professional Qualifications Standards*—will comprise the following:

1. **Historical Information** (synthesize results of private and public archival background research and integrate oral histories)
 - A. Physical History
 - B. Historic Context
2. **Architectural Information** (to supplement the information provided in measured drawings and photographs)
 - A. General statement of character and condition
 - B. Description of Exterior
 - C. Description of Interior
 - D. Site
 1. Historic landscape
 2. Outbuildings
3. **Sources of Information**
4. **Supplemental Materials**
 1. Scaled floor plans and exterior elevation drawings (printed copies and digital format on DVD)
 2. Scaled site plan (printed copies and digital format on DVD)
 3. DVD containing interior and exterior digital photographs (captured and stored in accordance with the NPS *National Register Photo Policy*, updated May 2013)
 4. DVD containing high quality scans of historic photographs and other primary source material made available by stakeholders
 4. DVD containing oral history videos captured in accordance to the Oral History Association’s *Principles and Best Practices for Oral History* (2009)
 5. DVD containing digital audio files for oral histories captured in accordance to the *Oral History Association’s Principles and Best Practices for Oral History* (2009)

Mountain Valley will provide 15 copies of the documentation package to be distributed to the five stakeholders (two copies each), the Braxton County Public Library (two copies), the WVDCH (one copy), the West Virginia State Archives (one copy) and the West Virginia and Regional History Collection (one copy).

5.0 SCHEDULE

Within two months of issuance of the FERC Certificate for the project, Mountain Valley will develop and submit a final scope of work and cost estimate for the documentation package to the WVDCH for review and approval. The final scope of work and funding will be implemented accordingly (as outlined in Section 4.3 above) and all activities related to the Treatment Plan will be completed within two years of the date of the Certificate.

ATTACHMENT 1
PHOTOGRAPH SIMULATION



Existing Condition

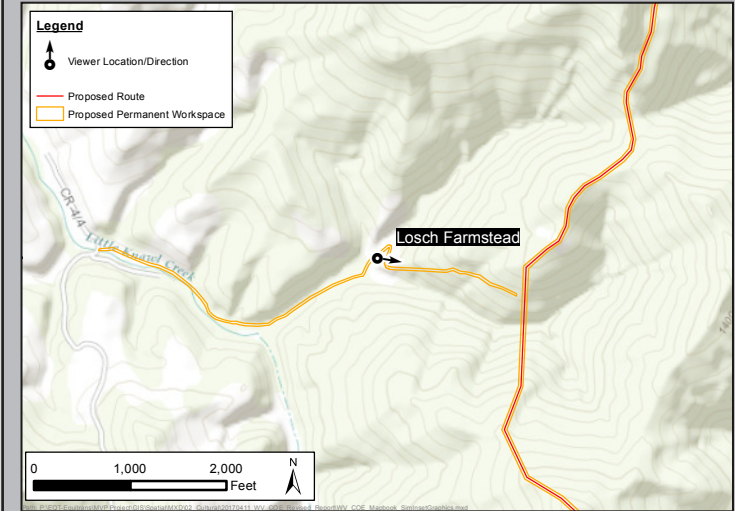


Post Construction (Leaf-off Conditions) - The 50-foot-wide permanent pipeline right-of-way is located approximately 0.3 mile east of Losch Farmstead at its closest point. The red arrows indicate where the pipeline right-of-way would cross hilly terrain. However, views of the pipeline right-of-way would be screened by terrain and vegetation.

Rating for Cunningham (Losch) Farmstead Photo Simulation: Inferior

Historic Property Information

WVSHPO ID	Address/ Location	NRHP Eligibility Determination by WVDCH-SHPO/Date	Report	MP	Nearest Project Feature to Primary Resource	Distance (ft) from Primary Resource to Nearest Project Feature	Nearest Project Feature to the Historic Property Boundary	Distance (ft) from Historic Property Boundary to Nearest Project Feature
BX-0351	CR 4/4 (Little Krawl Road)	Eligible: Criterion A Potentially Eligible B and C	Volume 2 Addendum 1	69.9	Access Road Temporary Workspace	26.5	Access Road Temporary Workspace	Crosses



Photograph Information

Time of photograph: 3:55 PM
Date of photograph: 4.24.2017
Weather condition: Overcast
Viewing direction: East
Latitude: 38° 48' 35.84" N
Longitude: 80° 32' 27.70" W
Photo Location: The photo was taken from along CR 4-4/Little Krawl Road, approximately 0.5 mile east of CR 19-12, and approximately 2 miles northeast of the Bulltown, West Virginia.

Mountain Valley Pipeline Project

Cunningham (Losch) Farmstead

Braxton County, West Virginia

ATTACHMENT 2
CORRESPONDENCE



TELEPHONE / PERSONAL CONVERSATION REPORT

PROJECT NAME:	Mountain Valley Pipeline
MVP TEAM CALLER:	Megan Neylon
CONVERSATION WITH:	Losch Farmstead
AGENCY:	N/A
EMAIL ADDRESS:	N/A
PHONE NUMBER:	304-872-6584
SUBJECT:	Mitigation for Impacts identified in the WVCOE Letter
DATE AND TIME:	See below

SUMMARY OF CONVERSATION:

08/14/17 5:26 PM - left a message with Michael Losch

08/14/17 5:27 PM - Spoke to Odessa Geary. Braxton County Historical Society has disbanded. However, if we need additional information on historical properties we can send her a letter at 194 N. Baxter Street, Sutton, WV 26601.

08/17/17 3:36 PM - left a message with Michael Losch

08/21/17 3:45 PM – spoke with Elizabeth Losch. Need to get all members of the estate on the phone (Michael Losch, Shirley Nelso, Sandra Losch, Barba Nickell) for a conference call. The best way to get Michael is to call Shirley. Elizabeth does not have a preference of a date or time for the call. Currently there is a timber company timbering the property. John Martin is the forester. Elizabeth mentioned that someone (assumed the timber company) is building up the road for their use.

8/24/17 8:30 AM – spoke to Michael Losch. He is interested in talking with MVP. His only preference of date and time is after 3:30 pm any day.

Conversations were held briefly for MVP to work on acquiring information on the extent of timber clearing occurring on the property and if a treatment plan is still necessary.

9/1/17 12:47 PM – Megan sent an email to Mitch Schaefer with information on the timber operations at Losch farm and requested a meeting to discuss it.



9/6/17 11:00 AM – phone call with Mitch Schaefer to discuss timber operations on the Losch Farm property.

9/6/17 4:54 PM – Email from Mitch on directions for the Losch Farm treatment plan.

9/8/17 10:26 AM – Call with Shirley Nelson would like to have a conference call with everyone. Monday at 4:00 PM would work for her.

9/8/17 10:41 AM – Call with Sandra (Gail) would like to have a conference call with everyone. Monday at 4:00 PM would work for her.

9/8/17 10:49 AM – Call with Elizabeth Losch Monday at 4:00 PM would work for her.

9/8/17 10:53 AM – Called and left a message with Michael Losch's wife. He has changed jobs and his wife does not believe he can get on a call until after 5:30 PM.

9/8/17 12:34 PM – Left a voicemail with Barbara Nickell about the SHPO letter and a conference call. I requested that she give me a call back to discuss.

9/11/17 11:00 AM –confirmation of 5:30 PM conference call with Barbara Nickell

9/11/17 – 10:29 AM - confirmation of a 5:30 PM conference call with Gail Losch

9/11/17 – 10:52 AM – confirmation of a 5:30 PM conference call with Robin Losch

9/11/17 – 10:31 AM – confirmation of a 5:30 PM conference call with Elizabeth Losch

9/11/17– 10:33 AM - confirmation of a 5:30 PM conference call with Shirley Nelson

9/11/17 5:30 PM – Call with Losch Family – Elizabeth Losch, Gail Losch, Barbara Nickell, Shirley Nelson, Michael Losch, Evelyn Tidlow and Hannah Dye

Megan did introductions. Hannah explained the process for field surveys, submitting information



to the SHPO, and why we are trying to mitigate adverse effects.

Losch's explained that the entire property is going to be timbered in quarters. The contact is John Martin (304-642-5597). Timbering is supposed to be done within 2.5 years. Everything over 18-inch diameter will be removed. He refers to it as the Cunningham Farm.

Hannah's mitigation idea include intensive documentation of the property with archival photographs, historic context, property history, etc. All are in agreement that this would be nice to have to pass down through the family.

House has had work completed – roof approximately 8-9 years ago, rooms have been paneled, no electricity but does have gas, some windows are falling in, there is a new kitchen porch and the kitchen floor has been tiled.

Periodically use the cabins for hunting.

Megan explained the schedule for submitting the treatment plan.

The call ended at approximately 6:25 PM.

9/19/17 – 2:50 PM Returned a call from Shirley Nelson received at 11:18 AM. Shirley explained that the farm should be referred to as the Cunningham Farmstead and not the Losch Farmstead. She would like to see the report corrected to reflect the original owners.

Contact Signature: _____