



# County of Roanoke

## Board of Supervisors

P OBOX 29800  
5204 BERNARD DRIVE ROANOKE, VA 24018-0798

June 10, 2015

Montgomery County Board of Supervisors  
Government Center  
755 Roanoke Street, Suite 2E  
Christiansburg, VA 24073

Chairman Brown & Members of the Board,

It is my understanding that the Montgomery County Board of Supervisors will hold a special meeting on Monday, June 15 to consider a draft Resolution related to the proposed Mountain Valley Pipeline (MVP). I have read the draft Resolution included on the Montgomery County website and would like to offer a few comments in anticipation of your Board's meeting.

As you know, the proposed MVP has generated considerable public concern throughout both the Roanoke and New River Valleys. The project's scale, the manner in which preliminary work is being conducted, the limited information that has been provided, and the constrained public process for commenting on the proposed MVP are all factors that have prompted many local governments in the region to express opposition to the project. The Roanoke County Board of Supervisors has taken a stance in opposition to the MVP project, a stance predicated on the exceptionally poor level of communication demonstrated by the pipeline company and the lack of compelling justification for a project with such significant local cost.

I note that in the draft Resolution to be considered by the Montgomery County Board, the Board's position in opposition to the pipeline is clearly stated. However, the Resolution also makes clear that if the pipeline is to proceed, Montgomery County clearly prefers the alternative alignment that functionally shifts the pipeline out of Montgomery County and expands the footprint of the project in both Craig and Roanoke Counties. The stated rationale for the preferred alternative is any number of negative impacts to people, land, and the environment.

The concerns raised in Montgomery County's draft Resolution are no less evident in Roanoke County. Roanoke County's Pipeline Advisory Committee (PAC) has spent months detailing the very specific impacts of the pipeline on Roanoke County (attached). Without hesitation I can state that the impacts of the pipeline on Roanoke County are at least equal to those described for Montgomery County, irrespective of alignment. It is then somewhat concerning to me that the Montgomery County Board would consider a Resolution that strongly supports the alternative route.

Further, given we are in the early stages of what is certain to be a protracted discussion on the MVP project, I would suggest it is not in our collective interest to suggest the inevitability of the pipeline and to begin to state preferences for the path it will travel. Better that we should exercise our due diligence in the Federal Energy Regulatory Committee (FERC) review process, work with our state and federal representatives, and ensure the citizens of our region are protected to the greatest extent possible.

Thank you for your consideration.

Regards,

A handwritten signature in black ink, appearing to read "P. Jason Peters". The signature is fluid and cursive, with the first name "P." and last name "Peters" clearly distinguishable.

P. Jason Peters  
Chairman  
Roanoke County Board of Supervisors

Enclosure

cc: Joseph P. McNamera, Roanoke County BOS, Windsor Hills Magisterial District  
Charlotte A. Moore, Roanoke County BOS, Cave Spring Magisterial District  
Al Bedrosian, Roanoke County BOS, Hollins Magisterial District  
Joseph B. "Butch" Church, Roanoke County BOS, Catawba Magisterial District  
Thomas C. Gates, Roanoke County Administrator  
Richard L. Caywood, PE, Assistant Roanoke County Administrator  
B. Clayton Goodman, Craig County Administrator  
Craig Meadows, Montgomery County Administrator  
Ruth Ellen Kuhnel, Senior Asst. Roanoke County Attorney  
Roanoke County Pipeline Advisory Committee

AT A REGULAR MEETING OF THE BOARD OF SUPERVISORS OF ROANOKE COUNTY, VIRGINIA, HELD AT THE ROANOKE COUNTY ADMINISTRATION CENTER ON TUESDAY, JUNE 9, 2015

**RESOLUTION 060915-1 AFFIRMING THE ROANOKE COUNTY PIPELINE ADVISORY COMMITTEE'S RECOMMENDED COMMENTS TO THE FEDERAL ENERGY REGULATORY COMMISSION (FERC) FOR THE SCOPING PROCESS OF THE MOUNTAIN VALLEY PIPELINE**

WHEREAS, the pipeline known as the Mountain Valley Pipeline (MVP) is expected to transport a natural gas supply from the Marcellus and Utica regions to various Southeast United States markets; and

WHEREAS, the MVP is governed by the United States Natural Gas Act, which requires a Certificate of Public Convenience and Necessity (CPCN) from the Federal Energy Regulatory Commission (FERC); and

WHEREAS, the Roanoke County Board of Supervisors has passed two (2) prior resolutions regarding the Mountain Valley Pipeline; and

WHEREAS, those resolutions are hereby incorporated by reference and are known as "Resolution 120914-4 of the Board of Supervisors of the County of Roanoke, Virginia opposing the Mountain Valley Pipeline" adopted December 9, 2014, and "Resolution 042815-5 petitioning the Federal Energy Regulatory Commission to hold an additional scoping public hearing in Roanoke County and to extend the public comment period during the scoping phase for the Mountain Valley Pipeline Project" adopted April 28, 2015; and

WHEREAS, the Roanoke County Board of Supervisors created the Pipeline Advisory Committee ("the Committee") by Resolution 031015-1; and

WHEREAS, the Committee met on June 1, 2015, and voted to submit additional comments to FERC on its behalf; and

WHEREAS, those comments are attached as Exhibit A and titled “Comments from the Pipeline Advisory Committee Recommended for adoption by the Roanoke County Board of Supervisors For submission to the FERC (Federal Energy Regulatory Commission) Mountain Valley Pipeline Project Scoping Comment Period.”; and

WHEREAS, the Committee seeks approval of those additional comments and their subsequent submission as allowed during the scoping process.

NOW THEREFORE BE IT RESOLVED by the Board of Supervisors of Roanoke County, Virginia, as follows:

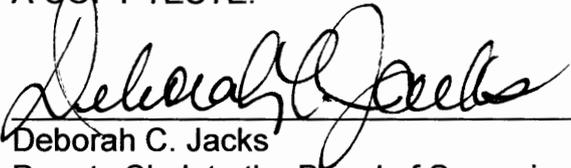
1. That the Resolution 120914-4 dated December 9, 2014 is hereby reaffirmed.
2. That the Resolution 042815-5 dated April 28, 2015 is hereby reaffirmed.
3. That the comments of the Roanoke County Pipeline Advisory Committee which are attached as Exhibit A, known as “Comments from the Pipeline Advisory Committee Recommended for adoption by the Roanoke County Board of Supervisors for submission to the FERC (Federal Energy Regulatory Commission) Mountain Valley Pipeline Project Scoping Comment Period” are hereby affirmed.
4. That the County Administrator is hereby directed to file a certified copy of this Resolution along with the attached exhibits with the Federal Energy Regulation Commission by the June 16, 2015 project scoping deadline.

On motion of Supervisor McNamara to adopt the resolution, and carried by the following roll call and recorded vote:

AYES: Supervisors Moore, Church, McNamara, Peters

NAYS: Supervisor Bedrosian

A COPY TESTE:



Deborah C. Jacks  
Deputy Clerk to the Board of Supervisors

cc: Richard L. Caywood, Assistant County Administrator  
Ruth Ellen Kuhnel, Senior Assistant County Attorney

**Comments from the Pipeline Advisory Committee  
Recommended for adoption by the Roanoke County Board of Supervisors  
For submission to the FERC (Federal Energy Regulatory Commission)  
Mountain Valley Pipeline Project Scoping Comment Period**

June 9, 2015

**Potential impacts to vegetation and wildlife:**

1. *Percina rex*, Roanoke Logperch is an Endangered species found in the Roanoke River that will be impacted directly by disturbance during construction and chronically by increased siltation following construction.  
<http://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?sPCODE=E01G>
2. *Noturus gilberti*, Orange-fin Madtom is a Threatened species found in the Roanoke River that will be impacted directly by disturbance during construction and chronically by increased siltation following construction.  
<http://www.dgif.virginia.gov/wildlife/virginiatescspecies.pdf>
3. *Clemmys muhlenbergii*, Bog Turtle is a Threatened species inhabiting the high elevation wetlands of Bent Mountain in Floyd, Roanoke and Franklin Counties. It will be directly impacted during construction and will continue to be impacted by the altered hydrology of the wetlands after construction.  
<http://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?sPCODE=C048>
4. *Glaucomys sabrinus*, Northern Flying Squirrel is an Endangered species inhabiting the forests of Montgomery Co. and may be directly impacted during construction and maintenance of the pipeline.  
<http://www.dgif.virginia.gov/wildlife/information/?s=050068>
5. *Myotis sodalis*, Indiana Bat is an Endangered species inhabiting the forests of Montgomery Co. and may be directly impacted during construction and maintenance of the pipeline. <http://www.dgif.virginia.gov/wildlife/information/?s=050023>
6. *Buckleya distichophylla*, Pirate Bush is an Endangered species inhabiting Poor Mountain and will be directly impacted during construction of the pipeline. The Poor Mountain population of the Pirate Bush is the largest known population of the species.  
<http://plants.usda.gov/core/profile?symbol=BUDI>

**Potential impacts to water resources and wetlands:**

1. Spring Hollow Reservoir is the primary drinking water supply for residents of Roanoke County.  
<http://www.westernvawater.org/85256a8d0062af37/vwContentByKey/N2628RP6374PLESEN> The proposed pipeline route will pass within 500 feet of the reservoir and the

construction area will be well within the drainage are of the reservoir increasing silt loads into the reservoir.

2. Poor Mountain, located in western Roanoke County, is the primary water source for much of the Roanoke Region. Water flows from Poor Mountain in all directions through surface run-off, creeks and small streams such as Bottom Creek, a Virginia Tier III stream used for recreational purposes and home to endangered species, and through underground aquifers throughout the mountain's karst topography. The Poor Mountain watershed is critical to supplying clean water to Roanoke County, and the Cities of Salem and Roanoke, and to rural areas of Montgomery and Henry Counties.
3. The entire 40 river miles reach of the Roanoke River downstream of crossing of proposed pipeline and above Smith Mountain Lake is part of the Roanoke River Blueway. <http://rvarc.org/blueway> Construction and maintenance of the pipeline will increase silt loads into the river causing the water to be muddy creating hazards for canoeists, kayakers, swimmers, tubers, and standup paddle boarders and making the river less aesthetic for users.
4. Bottom Creek is a world class whitewater destination drawing paddlers from around the United States and other countries. Disturbance during construction and maintenance will increase turbidity compromising the safety of paddlers. Flows will be compromised by altering the hydrology of the headwaters. In a recent study in nearby West Virginia, whitewater recreation was found to contribute over \$50 million annually to the economy and provide over 1400 jobs within the state. [http://www.americanwhitewater.org/content/Wiki/stewardship:recreation\\_economics](http://www.americanwhitewater.org/content/Wiki/stewardship:recreation_economics)
5. Over 25 miles of Greenway are in the Roanoke Valley primarily along the Roanoke River downstream of the Roanoke River crossing of the proposed pipeline. <http://roanokevalley.org/progress/> Over \$20 million have been spent constructing these Greenways to enhance the quality of life for the residents of the Roanoke Valley. Construction and maintenance of the pipeline will cause the water along these Greenways to be muddy compromising the experience of Greenway users.
6. The proposed pipeline route traverses native Brook Trout streams on Bent Mountain and crosses the Roanoke River just upstream of the VDGIF trout fishery in Salem and Roanoke. <http://www.dgif.virginia.gov/fishing/trout/area-maps/map3.pdf> The United States Fish and Wildlife Service estimates for 2006 indicated that trout fishing contributed >\$20 billion to the US economy, created 109,000 jobs, and created >\$1.7 billion in tax revenue. <http://digitalmedia.fws.gov/cdm/ref/collection/document/id/52> Virginia has 800,000 anglers and fishing has contributed \$1.3 billion dollars to the VA economy. <http://www.dgif.virginia.gov/fishing/benefits/>
7. In total, outdoor recreation is responsible for 6.1 million American jobs with 138,000 of those in Virginia, and contributes \$646 billion to the American economy with \$13.6 billion of that in Virginia. Almost 3 times as many Americans work in the outdoor recreation industry as work in the oil and gas industry, and Americans spend more

annually on outdoor recreation than they do on all forms of energy combined.

<http://outdoorindustry.org/advocacy/recreation/economy.html>

8. Vegetation: The high and steep slopes of Poor Mountain are characterized by oaks, hickories, table mountain pine and a unique stand of sugar maple reminiscent of New England forests. The ericaceous understory consists of azaleas, mountain laurel, doghobble and rhododendron. The cove hardwood community includes tulip poplars, cucumbers and Fraser magnolias. The alder-leafed viburnum, common to northern forests, inhabits the shrub layer. The Poor Mountain forest is a unique meeting place of the Northern California hemlock and the southern Carolina hemlock, both of which host the globally rare Piratebush. Poor Mountain hosts a remnant population of the American Chestnut, comprised of saplings that have sprouted from adventitious buds on the old roots of original trees whose trunks and limbs were killed in the early 20th century. Scientists interested in restoring the chestnut to the Appalachians anticipate this population may produce offspring with a natural resistance to the fungus that killed the original population.
9. Airborne species: Migrating upon on the isolated ridgetop of Poor Mountain includes 12,000 raptors observed in the 2007 season, and 2700 raptors between September 22nd and 23rd, 2009. Poor Mountain is recognized as a hawk migration site by the hawk Migration Association of North America - the second best hawk migration site in Virginia.
10. There are four tree bat species: the evening, silver-haired, red and hoary, which would inhabit large tracts of Roanoke forest during the warmer months which would migrate south in winter. because it is extremely difficult to do a census of tree bat populations, scientific evaluation of these species requires undertaking before any environmental stressors are introduced to populations already threatened (up to 95% of Vermont bats has been lost to white nose syndrome).Both the Virginia Big 'Eared bat and the Indiana bat have been found in Highland and Botetourt County and those counties south of Roanoke~ as the migration from hibernacula to summer habitats can range to 320 miles, scientists would conclude that they use the Blue Ridges and surrounding area as migration routes., according to the Virginia Dept. of Game and Inland Fisheries.
11. Other unique species include the Appalachian cottontail, woodland jumping mouse, spotted skunk and the long-tailed shrew, because of its unique habitat, possible residents include rock voles, Allegheny Woodrats, and Northern Flying Squirrels.

### **Potential impact to geology and soils:**

1. Poor Mountain, located in western Roanoke County, is the primary water source for much of the Roanoke Region. Water flows from Poor Mountain in all directions through surface run-off, creeks and small streams such as Bottom Creek, a Virginia Tier III stream used for recreational purposes and home to endangered species, and through underground aquifers throughout the mountain's karst topography. The Poor Mountain

watershed is critical to supplying clean water to Roanoke County, and the Cities of Salem and Roanoke, and to rural areas of Montgomery and Henry Counties.

2. Poor Mountain, at 2938 feet in elevation, is the highest mountain to Roanoke County, and its peaks and ridges are easily visible from Salem, Roanoke, the Blue Ridge Parkway, Montgomery County, Floyd County, Henry County, Botetourt County, and it is on the ILS6 flight approach to Roanoke – Blacksburg Regional Airport.
3. Due to Poor Mountain's value as a primary watershed, its geography, vegetation and wildlife, vistas and recreational activities, including but not limited to Bottom Creek Gorge, and considering Poor Mountain's natural beauty, the cumulative negative impacts of major construction as would occur with then building of the MVP over Poor Mountain is of great concern to us.
4. Although MVP may view the construction of the pipeline as presenting low potential for harm, the fact remains that we who live here perceive the potential for serious and long-term negative impacts to Poor Mountain and the surrounding Roanoke Valley as inevitable and unacceptable should construction proceed as planned.
5. Many sections of Poor Mountain exceed 50 degrees in slope. Environmental scientists have told us that disturbed soils will not adhere to grades of 50 degrees or greater, which could result in the long term sloughing off of disturbed soils and ground cover within the MVP's large construction corridor . Since Spring Hollow Reservoir and the Roanoke River are at the bottom of the north face of Poor Mountain, our water supply, and the many recreational activities associated with the beautiful Roanoke River would be at great risk.
6. Trenching and blasting across the Poor Mountain watershed could forever disrupt, block and reroute underground aquifers which supply the hundreds of springs and wells which are the only water sources for the many Roanoke citizens who live in the rural communities surrounding Poor Mountain.
7. The cumulative negative and irreversible impacts created by MVP's construction of the pipeline along the currently proposed route over Poor Mountain create conditions we believe are so potentially damaging to Poor Mountain and our community, they are unacceptable to us. We therefor urge MVP to develop an alternative route away from the Poor Mountain watershed. Additionally, we urge the FERC to direct MVP to alter its proposed route to avoid Poor Mountain in Roanoke County.

**Potential impacts to cultural resources:**

Potential Environmental Impact of the Mountain Valley Pipeline to Prehistoric Cultural Resources in the Roanoke River Floodplain

1. The southern portion of Virginia has been occupied for at least 11,500 years and the Roanoke Valley and surrounding area are a rich source of prehistoric archaeological resources especially along the Roanoke River.
2. The Buzzard Rock (44RN2), Thomas-Sawyer (44RN39), and Graham-White (44RN21) sites are notable examples in the Roanoke River floodplain of Late Woodland settlements (ca. A.D. 900 to 1700); with the latter two sites associated with European trade goods.
3. The proposed Mountain Valley Pipeline corridor is located south of the Thomas-Sawyer site, and the Virginia Department of Historic Resources (DHR) has conducted no archaeological surveys of the Roanoke River basin or its tributaries south of that site. Therefore, as yet undiscovered sites are not in the State Database.
4. Salem DHR Archaeologist, Tom Klatka, estimates that there is a “high probability” of unearthing further evidence of Native American settlements wherever a pipeline corridor might intersect the floodplains of the Roanoke River or its forks.
5. Socially complex Mississippian sites (including temple mounds) have been identified in Southwest Virginia in Lee and Scott Counties, and currently a Paleolithic site is being excavated in the Smith Mountain Lake area. Investigating the extent and range of such occupations could potentially be a focus of future archaeological exploration along the Roanoke River as well as in the mountains (which were the source of lithic materials and game for thousands of years).
6. Many will say that the pipeline excavation will be an opportunity to make new discoveries, but this will be contingent upon careful, unrushed examination of the evidence by experts in this area’s prehistory and artifact assemblages not by private out-of-state archaeological surveyors (hired by the pipeline company) who are unfamiliar with Virginia’s prehistory—and perhaps in a rush to return to their homes.
7. DHR will be involved, but only in the capacity of reviewing the private surveyor’s findings. “DHR will not make site visits,” said Tom Klatka.
8. Due to the high likelihood of significant prehistoric sites, Phase III full-scale mitigation (with excavation) should be the anticipated level of archaeological investigation of sites along the Roanoke River – not just Phase I survey or Phase II test pits. Therefore, pipeline engineers must factor this into their schedules and not be assuming one to two year completion dates for the project. Information-rich archaeological features like burials, trash pits, ceramic kilns, and roasting hearths can be lost in one swipe of a bulldozer’s blade.

9. The Roanoke River basin bears significant archeological resources that are both finite and fragile. Once disturbed, the history and its lessons are lost if they are not thoroughly investigated at the time that they are unearthed.

**Potential impacts to socioeconomics:**

1. In order to avoid steeper terrain and forest impacts, many sections of the corridor within Roanoke County pass through working farms. Many of these farms have been in single families for generations.
2. Temporary and permanent disruptions to these farming operations may have financial impacts for these families and threaten the continued viability of individual farms.
3. This appears to be a disparate impact on a select group of individuals who are primarily older and lower income than the community as a whole.

**Potential impacts to air quality and noise:**

1. If Alternate 110 is selected it is presumed that there is a high likelihood of a compressor station being located in Roanoke County. If a compressor station is even considered for Roanoke County we believe that the following issues would need to be carefully analyzed:
  - a. A detailed noise analysis that takes into account both topography and tree cover should be performed. This analysis should consider both occupied dwellings and businesses as receptors as well as resource receptors such as the Appalachian Trail, Camp Roanoke, and the Roanoke River etc. as appropriate based on the location under consideration.
  - b. Light pollution needs to be considered and analyzed.
  - c. Emissions are a specific concern. The Roanoke Valley is essentially a bowl that can trap pollutants. The Roanoke Valley Metropolitan Area is a marginal air quality attainment area that was previously bordering on becoming a non-attainment area. While regional cooperation has helped to maintain attainment area status, additional emitters have the potential to change this.
2. Loss of gas either intentionally through “venting” or unintentionally through leakage is a significant concern. While this concern is most pronounced relative to any potential compressor station, leaking may also occur from the line itself, at valves, or other mechanical connection.
3. Noise impacts during construction area a concern. We would recommend that FERC apply Roanoke County’s local noise ordinance to construction activities.

**Potential impacts to cumulative impacts:**

1. There are at least three, if not more similar pipeline projects crossing Western Virginia under consideration today. They are the Mountain Valley Pipeline, The Atlantic Coast Pipeline and the Appalachian Connector Project.
2. FERC should require that a comprehensive study be made of the cumulative impact, and purpose and need of these three projects and any similar projects.

**Potential impacts to public safety:**

1. The proposed route of the MVP pipeline, especially alternate 110 is largely located in portions of Roanoke County that are very remote from Fire and Rescue resources. While there are small outlying fire stations that may have reasonable response times to the pipeline, the bulk of the County's response resources are 30 – 45 minutes are farther from much of the proposed alignment.
2. Additional training and equipment along with associated ongoing funding will likely be required to prepare to respond to potential accidents and emergencies associated with the pipeline project.
3. We recommend that the applicant study potential Fire and Rescue impacts and provide required resources to mitigate these impacts.
4. Police resources are likely to be impacted during construction due to the presence of large numbers of temporary workers many of whom, according to MVP's filings, will reside in RVs or other temporary housing.
5. At the end of its useful or economic life, what is the plan for removal of the pipeline? A 42' pipe simply left in situ to rust will eventually create a sunken area 4-5 feet deep where the pipe once existed. This is of particular concern in areas where blasting into bedrock was used as an installation method. This would present both public safety and water quality issues.
6. Several areas of the proposed pipeline are in flood plain areas. How will the pipeline be protected from fast moving mountain streams and rivers? How is related erosion controlled? What impact will construction have on existing water quality and quantity issues?

**Potential impacts to land use, recreation, and visual resources:**

1. The original route crosses Camp Roanoke which is a 700 acre outdoor experience camp operated by Roanoke County. This camp has been in operation since 1925 and elements of the camp may also qualify as historic resources. Recent MVP filings to FERC incorrectly state that the route does not pass through the camp. To the contrary the originally proposed alignment is a few feet away from the manager's cabin. According

to MVP, the icon on a Google Earth map was used as the location of the camp which is at the location of the entrance road. This overlooks the fact that the camp is a 700 acre site with numerous features. The offset shown for the alternate alignment 135 is incorrect for the same reason.

2. Alternate 110 directly impacts multiple parcels of the Roanoke Valley Resource Authority which owns and operates the regional landfill at this location off of Bradshaw Road. Not only does alternate 110 cross future expansion area for the landfill, it also crosses the rail yard that is up to 5 tracks in width where trash trains to / from downtown Roanoke are assembled and disassembled.
3. The proposed crossing of the Blue Ridge Parkway is located in an area with prime, historical, farmland.
4. Both the pipeline route itself, and its associated above ground facilities and access roadways will be built on land that within Roanoke County is largely covered by dense forest. Permanent removal of these trees will create visual scars that in many cases are visible for many miles. A comprehensive analysis of the impact of this tree removal should be made with particular emphasis on the Blue Ridge Parkway,