

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

)	
Mountain Valley Pipeline LLC,)	CP16-10-000
Mountain Valley Pipeline Project)	PF15-3-000
)	
Equitrans, LP)	CP16-13-000
Equitrans Expansion Project)	PF15-22-000
)	

**ROANOKE COUNTY’S MOTION TO INTERVENE AND
IDENTIFICATION OF ISSUES**

Pursuant to Natural Gas Act section 15, 16 U.S.C. section 717n, the Commission’s implementing regulations, *see* 18 C.F.R. sections 385.214 and 157.10, and the “Notice of Applications,” Roanoke County, Virginia hereby moves to intervene in the certificate proceedings for Mountain Valley Pipeline, LLC’s proposed Mountain Valley Pipeline Project (MVP Project) and Equitrans, LP’s proposed Equitrans Expansion Project (Equitrans Project). While the County is primarily interested in the MVP Project, it intervenes in both proceedings since information filed or findings made in one docket may affect the outcome in the other.

This filing is organized into two parts. Part One is Roanoke County’s Motion to Intervene. In Part Two, the County identifies procedural and substantive issues for consideration by the Commission and Cooperating Agencies. Title 18 C.F.R. section 157.11 permits the Commission to use shortened procedures “[i]f no protest or petition to intervene raises an issue of substance.” The County identifies several issues to demonstrate that shortened procedures are not appropriate here.

**PART ONE
MOTION TO INTERVENE**

I. Roanoke County Is a Local Government within the Commonwealth of Virginia.

Roanoke County, Virginia regulates land use within its boundaries consistent with the Code of Virginia, Chapter 12. It is authorized to “adopt such measures as it deems expedient to secure and promote the health, safety and general welfare of its inhabitants which are not inconsistent with the general laws of the Commonwealth.”¹ It has adopted measures to regulate

¹ Code of Virginia §15.2-1200.

air pollution, erosion and sedimentation, parks and recreation, water, and zoning in the Roanoke County, Virginia – Code of Ordinances.²

Roanoke County covers approximately 251 square miles and has a population of approximately 91,000. It is located at the southern end of the famous Shenandoah Valley of Virginia with the Blue Ridge Mountains to the southeast and the Appalachian range to the northwest. Roanoke County is located adjacent to the Counties of Craig, Botetourt, Bedford, Franklin, Floyd and Montgomery. It also surrounds the independent Cities of Salem and Roanoke.

Based on review by its GIS-staff, the County understands that the proposed route for the MVP Project will enter and exit the County in two locations. The first intersection is one half mile south of Interstate-81 along the border with Montgomery County, exiting one quarter mile along the same border. The second intersection is 0.7 miles south of Yellow Finch Road, along the border with Montgomery County. The proposed pipeline will travel southeast, approximately eight miles, cresting Poor Mountain and crossing Honeysuckle Road, Bottom Creek Road, Bent Mountain Road, and the Blue Ridge Parkway before it reaches the border with Franklin County. The proposed pipeline route will cross Bottom Creek and Mill Creek. The pipeline/non-surveyed centerline will also intersect 31 parcels within Roanoke County.

II. Roanoke County Has Significant Interests in the Mountain Valley Pipeline Proceeding.

Roanoke County has significant interests which will be affected by the outcome of this proceeding. These interests include protection of the County's natural and cultural resources, as well as promotion of economic and community development within the County and broader region.

The County also has regulatory obligations that may be affected by the MVP Project. For example, under its Municipal Separate Storm Sewer System (MS4) Permit, the County must develop, implement, and enforce a program to minimize or prevent unauthorized stormwater discharges. If any certificate or related permits issued for the MVP Project are not adequately conditioned to minimize sediment runoff or other stormwater discharges from the project, it could increase the County's compliance burden. In other words, the MVP Project could expose the County to responsibilities and fines for construction and development conduct for which it has no permitting or oversight control. Roanoke County could experience significant financial impacts with no recourse.

The County's interests cannot be represented adequately by any other party, and its participation in this proceeding will not prejudice the rights of any other party. In sum, it is an interested party within the meaning of Natural Gas Act section 15(e).³

² An electronic copy of the Code is available at https://www.municode.com/library/va/roanoke_county/codes/code_of_ordinances?nodeId=PTICOCO.

The Roanoke County Board of Supervisors has participated actively in the pre-filing stage of the proceeding in order to protect its interests. Such participation has included filing County Resolutions relevant to the MVP Project with the Commission and submitting written and oral scoping comments.⁴ The County also has formed the Pipeline Advisory Committee (PAC) which is comprised of representatives from the community with interests and expertise related to natural gas development. The PAC, appointed by the Board of Supervisors, is Roanoke County's instrument for fair and objective review of all aspects of Mountain Valley Pipeline, LLC's application. The combined expertise of the PAC will allow Roanoke County to critically review and seek to resolve concerns specifically related to its interests.

III. Intervention Should Not Interfere with Roanoke County's Status As a Consulting Agency in the Section 106 Process.

By letter filed June 12, 2015, the County requested that the Commission grant it consulting agency status in the National Historic Preservation Act section 106 process.⁵ It made this request in furtherance of its duty to preserve the County's unique natural and cultural resources. These resources represent core components of the County's quality of life, recreation, and tourism achievements.

While the process may reveal other historic resources worthy of scrutiny and protection, Roanoke County notes that the Blue Ridge Parkway and the Appalachian Trail are two resources of particular concern. Efforts to assess the MVP Project's effects and to seek ways to avoid, minimize, or mitigate any adverse effects on historical and cultural resources are paramount to the County.

According to the Commission's guidance, communications made in the course of consultation under the Section 106 process are subject to the *ex parte* rule.⁶ For this reason, the County's intervention should not interfere with its request to serve as a consulting agency in the Section 106 process.

³ 16 U.S.C. § 717n(e).

⁴ See "Comments of the Roanoke County Board of Supervisors for Submission to the Federal Energy Regulatory Commission Mountain Valley Pipeline Project Scoping Comment Period," eLibrary no. 20150616-5188 (June 16, 2015) (Roanoke County Scoping Comments) (Attachment 1).

⁵ eLibrary no. 20150612-5247 (Attachment 2).

⁶ FERC, "Guidelines for reporting on cultural resources investigations for pipeline projects," (Dec. 2002), available at <http://ferc.gov/industries/gas/enviro/culresor.pdf> ("Off-the-record communications: FERC staff and applicants are bound by the regulations at 18 CFR 385.2201 governing off-the-record communications in all contested proceedings before the Commission. Staff cannot discuss issues relating to the merits of the case but can discuss procedural issues relating to NEPA analysis of the case.").

IV. Request for Service

The County requests that the Commission add the following representatives to the official service lists for the MVP and Equitrans certificate proceedings:

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PART TWO **IDENTIFICATION OF ISSUES**

I. Procedural Issues

A. The Commission Must Prepare an Environmental Impact Statement (EIS).

The Notice of Applications states:

Pursuant to section 157.9 of the Commission's rules, 18 CFR 157.9, within 90 days of this Notice the Commission staff will either: complete its environmental assessment (EA) ... or issue a Notice of Schedule for Environmental Review. If a Notice of Schedule for Environmental Review is issued, it will indicate, among other milestones,

the anticipated date for the Commission staff's issuance of the final environmental impact statement (FEIS) or EA for this proposal.⁷

The County disagrees that the Commission may rely exclusively on an EA to evaluate the environmental impacts of these projects. The Commission already has stated twice that it will prepare an EIS for the MVP proceeding.⁸ The fact that Office of Energy Projects (OEP) Staff has decided to prepare a joint environmental document for the MVP and Equitrans Projects only strengthens the need for an EIS.

Under the National Environmental Policy Act (NEPA) section 102, an EIS is required for proposals for major federal actions significantly affecting the quality of the human environment.⁹ The potential for significant adverse effects is sufficient to trigger this requirement.¹⁰ The Scoping Comments filed with the Commission clearly show the potential for significant adverse effects as a result of these two proposed pipeline projects. Accordingly, the County believes the Commission must prepare an EIS in order to comply with NEPA and implementing regulations.

⁷ FERC, "Notice of Applications," eLibrary no. 20151105-3025 (Nov. 5, 2015).

⁸ FERC, "Notice of Intent to Prepare an Environmental Impact Statement for the Planned Mountain Valley Pipeline Project, Request for Comments on Environmental Issues, and Notice of Public Scoping Meetings," eLibrary no. 20150417-3022 (April 17, 2015). *See also* letter from Paul Friedman, OEP, to Paul Diehl, MVP, eLibrary no. 20150811-3043 (Aug. 11, 2015), p. 1 ("The comments ask for clarifications of discrepancies and identify missing information that we believe is necessary to begin substantive preparation of an environmental impact statement for the Project.").

⁹ 42 U.S.C. § 4332(c); *see also* 40 C.F.R. § 1502.3. "The statutory requirement that a federal agency contemplating a major action prepare such an environmental impact statement serves NEPA's 'action-forcing' purpose in two important respects ... It ensures that the agency, in reaching its decision, will have available, and will carefully consider, detailed information concerning significant environmental impacts; it also guarantees that the relevant information will be made available to the larger audience that may also play a role in both the decisionmaking process and the implementation of that decision." *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349 (1989) (internal citations omitted).

¹⁰ "[A]n EIS must be prepared if 'substantial questions are raised as to whether a project ... may cause significant degradation of some human environmental factor.'" *LaFlamme v. F.E.R.C.*, 852 F.2d 389, 397 (9th Cir. 1988) (*quoting City and County of San Francisco v. United States*, 615 F.2d 498, 500 (9th Cir.1980)). *See also Anderson v. Evans*, 371 F.3d 475, 488 ("A showing that there are *substantial questions* whether a project may have a significant effect on the environment is sufficient." (internal citation and quotation marks omitted)); *California ex rel. Lockyer v. U.S. Dept. of Agriculture*, 575 F.3d 999, 1012 (9th Cir. 2009) ("The threshold that triggers the requirement for environmental analysis under [NEPA] is relatively low: It is enough for the plaintiff to raise substantial questions whether a project may have a significant effect on the environment." (citation and internal quotation marks omitted)); *State of La. v. Lee*, 758 F.2d 1081, 1085 ("plaintiffs must establish only that the Corps was unreasonable in concluding there was no reasonable possibility that the proposed action would significantly degrade any environmental factor.").

B. Preparation of a Programmatic EIS Would Provide More Efficient and Comprehensive Environmental Review.

As stated above, the Commission already has stated its intent to prepare an EIS for the MVP and Equitrans Projects. While the County believes that, at a minimum, the Commission must prepare an EIS for these two specific projects, it also supports the Commission's preparation of a programmatic EIS in these circumstances. The County notes that this request already has been made by several entities,¹¹ but OEP Staff has yet to respond.

As the County stated in its Scoping Comments, "[t]here 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."¹² The County requested that the Commission "require that a comprehensive study be made of the cumulative impact, and purpose and need of these projects and any similar projects."¹³ The County restates that request here, and submits that the most efficient way to conduct a comprehensive study of cumulative impact and need for these projects is to prepare a programmatic EIS.

According to the Council for Environmental Quality (CEQ), a programmatic NEPA review may be appropriate when a federal agency is deciding whether

to proceed with multiple projects that are temporally or spatially connected and that will have a series of associated concurrent or subsequent decisions. Programmatic examples include: Several similar actions or projects in a region or nationwide (e.g., a large scale utility corridor project.... Programmatic examples include: Several similar actions or projects in a region or nationwide ... or [a] suite of ongoing, proposed or reasonably foreseeable actions that share a common geography or timing, such as multiple activities within a defined boundary....¹⁴

¹¹ See, e.g., letter from Paul S. Kibel, Preserve Craig, to Ann F. Miles, OEP, eLibrary no. 20151019-5374 (Oct. 19, 2015); Giles County, Virginia, "Resolution Petitioning the Federal Energy Regulatory Commission to Provide a Programmatic Environmental Impact Statement that Addresses the Cumulative Impacts of the Mountain Valley Pipeline, the Atlantic Coast Pipeline, the Appalachian Connector Pipeline, and the WB Express Project," eLibrary no. 20151106-0035 (Nov. 6, 2015); letter from Hon. A. Donald McEachin to Chairman Norman C. Bay, eLibrary no. 20151123-0131 (Nov. 19, 2015).

¹² Roanoke County Scoping Comments, p. 6.

¹³ *Id.*

¹⁴ CEQ, *Effective Use of Programmatic NEPA Reviews* (Dec. 2014), available at https://www.whitehouse.gov/sites/default/files/docs/effective_use_of_programmatic_nepa_reviews_18dec2014.pdf, p. 12.

The County believes that the Commission's decisions whether to issue certificates for multiple pipeline projects within the West Virginia/Virginia region in the near term meet CEQ's criteria for preparing a programmatic EIS.

The County further believes that a programmatic EIS would result in a more accurate and complete analysis of regional baseline conditions, cumulative impacts, connected actions, and indirect effects. The Commission and other jurisdictional agencies could rely on the analysis in the programmatic EIS to inform project-specific EISs, rather than duplicating this analysis in each project-specific EIS. The County believes this would result in a more efficient application review process, better-informed decisionmaking, and ultimately better environmental and socioeconomic outcomes in these pipeline proceedings.

C. The EIS Should Address All Reasonably Foreseeable Facilities Needed for the MVP Project.

Resource Report 1 provides the general description of the proposed MVP Project. The County expects this project description will serve as the Applicant's Proposal for purposes of OEP's analysis in the EIS. The County is concerned that the project description omits facilities that were included in previous descriptions of the MVP Project. The County is particularly concerned about the omission of the Swann Compressor Station. The County wants to assure that the applicant has not simply deferred construction of this or any other anticipated facilities in order to circumscribe environmental review.

According to Resource Report 1,

The pipeline will be located in 17 counties in West Virginia and Virginia. To move the gas from the starting point in Wetzel County, West Virginia to the terminus in Pittsylvania County, Virginia, the pipeline will require three compressor stations along the route. Currently, MVP anticipates four interconnects located along the pipeline but will continue to evaluate market demands to determine if additional interconnects might be warranted.¹⁵

Resource Report 1 identifies three compressor stations – Bradshaw, Harris, and Stallworth¹⁶ – all of which are located in West Virginia, approximately 75 miles apart.¹⁷ It omits the Swann Compressor Station, which was described in Draft Resource Report 1 issued in March 2015 as follows:

¹⁵ Resource Report 1, p. 1-6.

¹⁶ The compressor stations would be located at approximate mileposts (MP) 2.8, 77.5, and 154.2, respectively. *Id.* at p. 1-7.

¹⁷ *Id.* at p. 1-8.

Swann Station will be constructed at approximately MP 220.51 in Montgomery County, Virginia and will pull gas from the Stallworth Station, for delivery to the Transco Interconnect. The approximately 31,800 hp station is designed to raise the pressure from 800 psig to 1,480 psig ... [T]he target capacity at this time is 2,000 MMcf/d with a potential of flowing up to 2,500 MMcf/d via a mix of centrifugal turbine units ... A plot plan of the station will be provided with Resource Report 1, Appendix 1-D of MVP's application to the FERC.¹⁸

By removing the fourth compressor station, Mountain Valley Pipeline, LLC is effectively limiting its ability to use the proposed pipeline's potential capacity, at least to start.¹⁹ However, it has plainly left open the possibility that it will include additional interconnects if there is sufficient market demand.²⁰ The County understands that a fourth compressor station would be needed to accommodate additional interconnects.

The County would strongly prefer that no compressor stations be constructed in or adjacent to the County. However, the County is concerned that Mountain Valley Pipeline, LLC has simply deferred its proposal for a fourth compressor station to expedite review and approval of the current application. Based on the County's review of Resource Report 1, the construction of a fourth compressor station is reasonably foreseeable because such facility will be necessary to operate the proposed pipeline at its potential capacity. For this reason, the County requests that the Commission and Cooperating Agencies evaluate the impacts of the MVP Project with a fourth compressor station in the EIS.²¹ This is necessary to assure that the Commission, Cooperating Agencies, and public have a full understanding of the potential environmental impacts of the MVP Project at anticipated build-out and of the opportunities to limit or avoid those impacts.

¹⁸ Draft Resource Report 1, pp. 1-8 – 1-9. Now that the Swann Compressor Station has been removed from the project description, the pipeline will travel approximately 150 miles before it reaches the Transco Interconnect. *See id.* at p. 1-4.

¹⁹ Resource Report 1 states, “[t]he capacity of the MVP system is limited by the design capacity of the compressor stations.” *Id.* at p. 1-4.

²⁰ *Id.* at p. 1-6.

²¹ “[W]hen determining the contents of an EA or an EIS, an agency must consider all ‘connected actions,’ ‘cumulative actions,’ and ‘similar actions.’” *Delaware Riverkeeper Network v. F.E.R.C.*, 753 F.3d 1304, 1314 (D.C. Cir. 2014) (*citing* 40 C.F.R. § 1508.25(a)). “An agency impermissibly ‘segments’ NEPA review when it divides connected, cumulative, or similar federal actions into separate projects and thereby fails to address the true scope and impact of the activities that should be under consideration.” *Id.* at 1313. Cumulative effects analysis must include evaluation of reasonably foreseeable actions. 40 C.F.R. § 1508.7.

II. SUBSTANTIVE ISSUES

In its Scoping Comments, the County identified many issues of substance with regard to the proposed MVP Project.²² Based on its preliminary review of the application, the County believes that many of these issues have not been adequately resolved. For that reason, the County incorporates by reference those issues previously identified as if stated fully herein. The County reserves the right to supplement these issues upon further review of the application and any supplemental information.

As required by 18 C.F.R. section 157.11, the County requests that the Commission provide evidentiary or other appropriate hearing procedures to resolve these issues to the extent they remain unresolved at the time the draft EIS is issued. The County does not support OEP's use of shortened procedures to dispose of Mountain Valley Pipeline, LLC's application.

In addition to, or in clarification of, the Scoping Comments herein incorporated by reference, Roanoke County highlights the following issues that have been brought to its attention by the PAC.

A. The Application for the MVP Project Does Not Adequately Address Protection of Water Resources Consistent with Revised Definition of Waters of the United States.

On June 29, 2015, the U.S. Environmental Protection Agency and U.S. Army Corps of Engineers (Army Corps) published the final rule defining the scope of waters protected under the federal Clean Water Act.²³ Members of the PAC have expressed concerns that Resource Report 2 does not adequately identify or address potential impacts to headwaters located within, or tributary to waterways within, Roanoke County that are protected under the new rule. For example, the topographic maps that are currently available under-represent the number of jurisdictional headwater streams in the affected watersheds. The Commission, in cooperation with the Army Corps, should require Mountain Valley Pipeline, LLC to undertake field studies along the mountain ridges in order to accurately identify these headwaters.

On-the-ground investigation is needed not only to identify headwater streams, but also to develop appropriate mitigation measures. The uniquely steep slopes in Roanoke County create an engineering challenge²⁴ for pipeline construction. The County requests that the Commission and Cooperating Agencies undertake, or direct the applicant to undertake, further investigation of appropriate mitigation measures for these headwater streams preparatory to drafting the EIS.

²² Roanoke County's Scoping Comments.

²³ 80 Fed. Reg. 37054. The final rule became effective on August 28, 2015.

²⁴ Based on our initial review of Resource Report 2, it appears unclear as to whether the pipeline will increase or decrease stream flow in affected.

B. A Nationwide Permit Is Not Appropriate for the MVP Project.

In Resource Report 2, Mountain Valley Pipeline, LLC states its intent to submit a Nationwide Permit application to the Norfolk District of the Army Corps for Waters of the United States within Virginia.²⁵ The County is concerned about the applicant's decision to seek to comply with Clean Water Act section 404 for a project of this magnitude through a Nationwide Permit rather than a specific permit. Reliance on Nationwide Permits for pipeline construction in Appalachia has contributed to unmitigated impacts to mountain streams and adjacent riparian areas.

The County expects Mountain Valley Pipeline, LLC will apply for coverage under Nationwide Permit-12 (NWP-12), which covers "utility line activities," where a utility line is defined to include "any pipe or pipeline for the transportation of any gaseous, liquid, liquescent, or slurry substance, for any purpose...."²⁶ The coverage is limited to an activity that "...does not result in the loss of greater than 1/2-acre of waters of the United States for each single and complete project."²⁷ Based on the County's initial review of Resource Report 2,²⁸ it appears the MVP Project will result in loss of greater than 1/2-acre of jurisdictional wetlands, making use of the NWP-12 inappropriate here.

²⁵ Resource Report 2, p. 2-61. Under section 404(e), the Army Corps has adopted general permits, known as Nationwide Permits (NWPs), to cover activities that have minimal adverse impacts on environmental quality. 33 C.F.R. § 330.1(b). This program is intended to minimize delay or paperwork, since an activity is authorized if it complies with all of the terms and conditions for the applicable NWP without the necessity for an individual application under section 404(a). 33 C.F.R. § 330.1(c).

²⁶ Army Corps, "2012 Nationwide Permits, Conditions, District Engineer's Decision, Further Information, and Definitions" (2012) (2012 Nationwide Permits), p. 7, *available at* http://www.usace.army.mil/Portals/2/docs/civilworks/nwp/2012/NWP2012_corrections_21-sep-2012.pdf. The Virginia Department of Environmental Quality (VDEQ) has already issued a certification under CWA section 401 for NWP-12: "[t]he State Water Control Board hereby provides conditional § 401 Water Quality Certification for the following Nationwide Permits as meeting the requirements of the Virginia Water Protection permit Regulation, which serves as the Commonwealth's § 401 Water Quality Certification provided that any compensatory mitigation meets the requirements of the Code of Virginia, Section 62.1-44.15.23 A through C as detailed below ... NWP 12: Utility Line Activities, provided that the activities are not associated with intake structures or do not transport non-potable raw surface water...." Letter from David K. Paylor, VDEQ, to Col. Paul B. Olsen, USACE (April 18, 2012), p. 2, *available at* http://www.nao.usace.army.mil/Portals/31/docs/regulatory/nationwidepermits/2012_NWP_401_Certification_Letter.pdf. The County further understands that a Virginia Water Protection permit from VDEQ is not required when a project is covered by a Nationwide Permit that has already received Section 401 certification. See Virginia, "A Public Guide to the Wetland Permitting Process in Virginia," *available at* <http://www.deq.virginia.gov/portals/0/deq/water/wetlandsstreams/publicguiderevised2012.pdf>, p. 2-1.

²⁷ Army Corps, 2012 Nationwide Permits, p. 7.

²⁸ See Resource Report 2, Table 2.3-1, App. 2-1, Table 2-A-2.

The Army Corps has authority to modify NWP-12 or issue an individual permit if the District Engineer (DE) finds the proposed project would have more than “minimal” environmental effects:

If the DE finds that the proposed activity would have more than minimal individual or cumulative net adverse effects on the environment or otherwise may be contrary to the public interest, he shall modify the NWP authorization to reduce or eliminate those adverse effects, or he shall instruct the prospective permittee to apply for a regional general permit or an individual permit.²⁹

The County requests that the Commission, in cooperation with the Army Corps, direct Mountain Valley Pipeline, LLC to apply for an individual permit. If the Commission and Army Corps are not willing to instruct the applicant to apply for an individual permit, the County requests that the agencies explain the legal and factual basis for finding that a Nationwide Permit is appropriate in these circumstances.

C. The Application for the MVP Project Does Not Adequately Provide for the Development of Site Specific Measures to Mitigate Impacts Related to Erosion and Sediment Runoff.

Resource Report 2 for the MVP Project states

Crossings of minor perennial and intermittent streams will be accomplished in accordance with FERC’s Procedures and variances requested by MVP, if approved. MVP will also develop and implement its own Project-specific Erosion and Sediment Control Plan (E&SCP) that will outline BMPs to minimize impacts on various resources, including waterbodies.³⁰

Mountain Valley Pipeline, LLC states that its E&SCP will be sufficient to address most erosion and sediment-related impacts from construction.³¹ It does not describe specific measures that will be included in the E&SCP. It does not describe whether or when the E&SCP will be published for review and comment.

Mountain Valley Pipeline, LLC also states its intent to “continue to consult with agencies during the permitting process to identify additional appropriate site-specific mitigation measures

²⁹ 33 C.F.R. § 330.1(d).

³⁰ Resource Report 2, p. 2-32.

³¹ *See id.* at pp. 2-25, 2-36, 2-42, 2-51, 2-55 (“To minimize and/or mitigate potential impacts from pipeline construction and disturbance from other facilities, MVP will implement the FERC Plan and Procedures and our E&SCP, specifically with respect to erosion and sedimentation control, bank stabilization, and bank revegetation, which will minimize impacts related to turbidity and sediment transport into adjacent waterbodies.”), 2-68.

relating to sediment runoff potential.”³² It notes that “WVDEP and VDEQ have the authority to permit work within Waters of the US via the Section 401 permit.”³³

However, Mountain Valley Pipeline, LLC intends to apply for a Nationwide Permit to satisfy Clean Water Act section 404. If Mountain Valley Pipeline, LLC is successful in obtaining coverage under NWP-12, the County is unclear as to what further permitting processes would occur at the state level to identify site-specific mitigation measures.³⁴ VDEQ has already issued a conditional Section 401 certification for NWP-12, and the County understands a separate VWP permit is not necessary for projects that are covered by Nationwide Permits that have received Section 401 certification.³⁵

As stated above, the County is required to prevent unauthorized stormwater discharges under its MS4 Permit. If any certificate or related permits for the MVP Project are not adequately conditioned to minimize or prevent the MVP Project’s erosion and sediment-related impacts, it could increase the County’s compliance burden. More importantly, it could contribute to non-attainment of applicable water quality standards in waters affected by the MVP Project.

In sum, the County is concerned that Mountain Valley Pipeline, LLC’s planned E&SCP will not be sufficient to adequately address project-related erosion and sediment impacts within the County’s uniquely steep terrain. The County’s concerns are exacerbated by the lack of clarity as to whether and how Mountain Valley Pipeline, LLC will solicit VDEQ’s review and comment on the E&SCP. The County requests that the Commission and Cooperating Agencies require additional information regarding Mountain Valley Pipeline, LLC’s specific plans to mitigate erosion and sediment-related impacts preparatory to drafting the EIS. The County further requests that the Commission require Mountain Valley Pipeline, LLC to publish its E&SCP for review and comment by interested parties.

D. Abandonment

The Notice of Applications states that Mountain Valley Pipeline, LLC is seeking “a blanket certificate of public convenience and necessity under Part 157, Subpart F, of the

³² *Id.* at p. 2-51.

³³ *Id.* at p. 2-55.

³⁴ *See* note 26, *supra*.

³⁵ *See id.*

Commission’s regulations for Mountain Valley to construct, operate, acquire, and abandon certain eligible facilities, and services related thereto...”³⁶

The application states that Mountain Valley Pipeline, LLC has no plans to expand or abandon facilities:

1.6 FUTURE PLANS AND ABANDONMENT MVP currently has no plans for either future expansion or abandonment of the facilities. Market forces will determine the timing and need for future expansions. The Project is projected to have at least a 50-year minimum physical life. However, the life of the Project may be constrained by other factors, such as gas supply life. ... At the end of the useful life of the Project, MVP will obtain the necessary permission to decommission its facilities.³⁷

Given the potential environmental impacts of acquisition or abandonment of any facilities in this region, the County objects to the Commission issuing a blanket authorization for acquisition or abandonment of unspecified facilities at some future time. The County requests that the Commission deny blanket authorization at this time, and instead require Mountain Valley Pipeline, LLC to apply for project-specific authorization at such time as it has specific proposals.

CONCLUSION

Roanoke County respectfully requests that the Commission grant the Motion to Intervene contained in Part One and consider the issues and related requests identified by the County in Part Two.

Dated: November 25, 2015

Respectfully submitted,



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³⁶ Notice of Applications, p. 1. “A blanket certificate issued pursuant to this subpart authorizes the certificate holder, in accordance with the provisions of this subpart, to engage in any of the activities specified in § 157.208 through § 157.218 (as may be amended from time to time).” 18 C.F.R. § 157.203.

³⁷ Resource Report 1, p. 1-44

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*Roanoke County's Motion to Intervene
Mountain Valley Pipeline Project (CP16-10-000)
Equitrans Expansion Project (CP16-13-000)*

DECLARATION OF SERVICE

**Mountain Valley Pipeline, LLC's Mountain Valley Pipeline Project (CP16-10-000) and
Equitrans, LP's Equitrans Expansion Project (CP16-13-000)**

I, Julie Gantenbein, declare that I today served the attached "Motion to Intervene by Roanoke County, Virginia" by electronic mail, or by first-class mail if no e-mail address is provided, to each person on the official service list compiled by the Secretary in this proceeding.

Dated: November 25, 2015

By: 

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Attachment 1



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Comments of the Roanoke County Board of Supervisors For submission to the Federal Energy Regulatory Commission Mountain Valley Pipeline Project Scoping Comment Period

June 16, 2015

Potential impacts to vegetation and wildlife:

1. *Percina rex*, Roanoke Logperch is an Endangered species found in the Roanoke River and its larger tributaries 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, Craig Creek and Bottom Creek that will be impacted directly by disturbance during construction and chronically by increased siltation following construction. <http://www.dgif.virginia.gov/wildlife/virginiatespecies.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>
7. Salamanders, along with many other amphibian species have been declining in recent years. The IUCN lists 47% of the world's salamanders threatened or endangered, yet few people know that the Appalachian region of the United States is home to 14% of the world's 535 salamander species, making

it an extraordinary salamander biodiversity hotspot, and a priority region for salamander conservation. Observations within the Appalachians suggest that salamanders are declining. Populations of 38 species of Plethodon salamanders (5 of which are found in Roanoke, Craig and/or Franklin counties) declined by 50% in the 1990s, and the causes remain unknown. Clearcutting of a pipeline corridor near spring branches and streams, infilling mountain hollows, disrupting spring branches through excavation and blasting, spraying with herbicides -- all of these actions would threaten salamander numbers and even the species.

<http://nationalzoo.si.edu/SCBI/SpeciesSurvival/AmphibianConservation/AppalachianSalamanderReport.pdf>

http://www.virginiaherpetologicalsociety.com/amphibians/salamanders/salamanders_of_virginia.htm

Potential impacts to water resources and wetlands:

1. Spring Hollow Reservoir is a major 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 portions of the construction area will be within the drainage area of the reservoir and will increase silt loads into the reservoir if appropriate mitigation is not provided.
2. Poor Mountain, located in western Roanoke County, is a significant water source for much of the Roanoke Region. Water flows from Poor Mountain in all directions through surface run-off, creeks and 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, Franklin, and Henry Counties. This is especially true for residents served exclusively by wells.
3. The entire 40 mile 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 have the potential to 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/River/detail/id/1887/>
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 could cause the water along these Greenways to be muddy compromising the experience of Greenway users.
6. The proposed pipeline route traverses rainbow and 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-leaved viburnum, common to northern forests, inhabits the shrub layer. The Poor Mountain forest is a unique meeting place of the Eastern Hemlock (*Tsuga canadensis*) and the Carolina Hemlock (*Tsuga carolinians*), 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, at 3,928 feet in elevation, is the highest mountain in Roanoke County, and its peaks and ridges are easily visible from Salem, Roanoke, the Blue Ridge Parkway, Montgomery County, Floyd County, Henry County, and Botetourt County, and it is on the ILS6 flight approach to Roanoke – Blacksburg Regional Airport.

2. 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.
3. 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 risk.
4. 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.
5. 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 therefore 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. 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.
8. 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.
4. There is widespread community concern regarding the potential for depressed real estate values. It should be noted that in our largely forested and mountainous area, real estate values are often strongly influenced by the quality of the view-shed. The clear cutting required for both the installation of the pipeline and its associated access roads and compressor stations has the potential to influence real estate values over a wide area. We recommend that FERC require a detailed analysis of this issue for this particular project. This analysis should include the work of licensed real estate appraisers who have work experience in our area.
5. The Roanoke Regional Chamber of Commerce has endorsed the project due to its potential to drive economic development.
6. The construction of the Mountain Valley Pipeline would bring the potential for natural gas service to neighboring Franklin County. This could encourage regional economic growth and development.
7. Although the pipeline is anticipated to be constructed by out of the area contractors, there will be potential local economic benefits during construction due to the presence of a large number of construction workers. It is also anticipated that bulk commodities such as asphalt, aggregate, and other non-pipe construction materials will be purchased locally.
8. Roanoke County anticipates modest tax revenues from the completed facility.

9. The project would bring a third source of natural gas to our area which could serve to increase natural gas supply and increase competition and therefore reduce prices for customers currently served by Roanoke Gas.

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 Mountain Valley Pipeline is very close to numerous occupied dwellings along its route, and proposed alternates, within Roanoke County. Citizens are concerned about direct impacts to their personal safety including the potential for line ruptures / explosions, intentional venting of gas at valves / compressors, and combustion emissions from compressors. Roanoke County recommends that FERC require a detailed risk assessment of these direct safety impacts as well as mitigation strategies to include advanced pipeline monitoring, automatic shut-off valves, and line relocation.
2. 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 or farther from much of the proposed alignment.

3. 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.
4. We recommend that the applicant study potential Fire and Rescue impacts and provide required resources to mitigate these impacts.
5. 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.
6. 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.
7. 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,
5. Route 110J would have the pipeline cross the Appalachian Trail just west of Dragon's Tooth in Roanoke County, one of the most iconic views and rock formations along the entire AT.
6. The original route would cross a 200+ acre farm on Bent Mountain, owned by David Higginbotham and protected by the Blue Ridge Land Conservancy. The farm is visible from Sling's Gap on the Blue Ridge Parkway and is the source of many tributaries that flow into Bottom Creek. MVP admits that its

alternative route, moving approximately one tenth of a mile southwest of the Higginbotham farm toward Russwood Rd, does little to reduce the overall environmental impact of the route over Poor/Bent Mountain. See Draft resource report 10.

Submitted by:

Richard L. Caywood, P.E.

Assistant County Administrator

540-776-7190

Attachment 2



County of Roanoke

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Norman C. Bay,
Chairman
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

In re: PF 15-03 Mountain Valley Pipeline; Request To Become A Consulting Party

Dear Mr. Bay:

Please accept this correspondence as the Roanoke County Board of Supervisors' request to become a Consulting Party in the Section 106 process within the Federal Energy Regulatory Commission's (FERC) review of PF 15-3 by the applicant Mountain Valley Pipeline, LLC. Roanoke County's Board requests this status pursuant to 36 Code of Federal Regulations 800.2(c)3, promulgated under the National Historic Preservation Act of 1966 (as amended). This regulation entitles a representative from a local government to act as a Consulting Party and to act as an agency official for purposes of the Section 106 review in the FERC process.

Roanoke County requests this status to assist in the identification of historic properties potentially affected by the proposed Mountain Valley Pipeline application. While the process may reveal other historic resources worthy of scrutiny and protection, Roanoke County specifically notes that the Blue Ridge Parkway and the Appalachian Trail are two resources of particular concern. The applicant understands its role to assist in identifying historic properties potentially affected by the proposed natural gas pipeline, assess its effects and to seek ways to avoid, minimize or mitigate any adverse effects on the identified properties.

The Roanoke County Board of Supervisors will continue to be involved in many aspects of Mountain Valley Pipeline's application with FERC. It is not Roanoke County's intention to

preclude itself from other avenues or actions during the process, including requesting either cooperating or intervening status in the future. Please advise if there is any other step to achieving the Consulting Party status beyond this letter request.

If you have any questions or if you need additional information please call me at (540) 776-7190 or at rcaywood@roanokecountyva.gov.

Very truly yours,



Richard Caywood
Assistant County Administrator

cc: Ruth Ellen Kuhnel, Esq.
David C. Perry
Roger Kirchen, DHR
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Document Content(s)

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