

July 12, 2017

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Reference: Docket # CP16-10-000

Dear Secretary Bose:

Preserve Roanoke, a chapter of Blue Ridge Environmental Defense League, respectfully submits these comments in response to Mountain Valley Pipeline (MVP)'s May 10, 2017 filing to Federal Energy Regulatory Commission (FERC), titled, "Response to Post-Draft Environmental Impact Statement Environmental Information Request #2 Issued March 20, 2017".

In these comments, we criticize the flawed methodology employed by MVP's historic preservation consultant, Tetra Tech, in its assessment of the MVP pipeline's impacts to historic resources in Virginia, and demand that the assessment be done over in a correct and appropriate manner. Among our complaints about Tetra Tech's methodology is its failure to give adequate consideration to guidance provided by Virginia Department of Historic Resources in the assessment of impacts to rural historic districts impacted by the MVP pipeline.

We also plea for reform of FERC's management of the massive amount of data being generated for the MVP pipeline under National Environmental Policy Act.

These comments focus particularly on two historic districts in Roanoke County, VA: the Coles-Terry Rural Historic District and the Blue Ridge Parkway Historic District.

INTRODUCTION

Proliferation of naming conventions used by FERC and MVP

MVP's May 10 filing is named/designated/identified/linked several different ways by MVP and FERC. We're not sure which is the "correct" way to refer to this document, so we've tried to list all of the document's names, identifiers, labels, designations, and links, below.

A. Accession Number:

a. 20170511-5018

B. URL on FERC eLibrary providing access to May 10 filing:

- a. https://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20170511-5018

C. Wording of link to May 10 filing on FERC eLibrary, at URL shown above:

- a. Attachment DR5 Cultural 5 – PART 1 OF 7
- b. Attachment DR5 Cultural 5 – PART 2 OF 7
- c. Attachment DR5 Cultural 5 – PART 3 OF 7
- d. Attachment DR5 Cultural 5 – PART 4 OF 7
- e. Attachment DR 5 Cultural 5 – PART 6 OF 7
- f. Attachment DR5 Cultural 5 – PART 7 OF 7

D. Title at top of MVP’s 4-page document responding to FERC’s March 20 request:

- a. “Response to Post-Draft Environmental Impact Statement Environmental Information Request #2 Issued March 20, 2017”

E. Title of May 10 report prepared by MVP’s cultural resources consultant, Tetra Tech:

- a. “Criteria of Effects Report Giles, Craig, Montgomery, Roanoke, Franklin, and Pittsylvania Counties, Virginia”, May 2017

F. Designations appearing on first cover sheet of Tetra Tech’s May 10 report:

- a. Docket No. CP16-10
- b. FR# 15-76-MULTI

G. Designations appearing on second cover sheet of Tetra Tech’s May 10 report:

- a. FERC DOCKET # CP16-10
- b. DHR FILE #2014 1194

The presence of so many different naming conventions to designate a single document is symptomatic of the inaccessible, disorganized, poorly-indexed, and, frankly, chaotic nature of the National Environmental Policy Act (NEPA) environmental review process as conducted by FERC for the MVP pipeline. The absence of any apparent attempt at coordination of the MVP pipeline’s administrative record by name, date, or topic, combined with the drastically accelerated pace of the NEPA environmental review process employed by FERC for the MVP pipeline, has transformed what should be a transparent, lucid, and publicly accessible disclosure of environmental impacts into an inscrutable, inaccessible, nearly unusable mass of discontinuous data that, by its opacity and resulting ambiguity, violates the spirit of NEPA.

For example, within the hundreds of pages of text contained in MVP’s May 10 filing to FERC discussed in this letter, there are four documents titled “Appendix A”:

- Appendix A – Correspondence and Consultation
- Appendix A – NPS Field Forms
- Appendix A – Project Map, Viewshed Analysis, and Visibility Analysis
- Appendix A – Pre-Blast Survey.

There are three documents titled “Appendix B”:

- Appendix B - Methods of Historic Architecture Criteria of Effects Assessment
- Appendix B - Viewshed Analysis
- Appendix B - Visual Simulations and Project Photography.

There are four documents titled “Appendix C”:

- Appendix C - Criteria of Effects Task 1 Summary Report
- Appendix C - Project Photography
- Appendix C - BLM Contrast Rating Forms
- Appendix C - Siesmograph Report.

The May 10 filing is actually a compilation of documents discussing a large number of different topics, written by different Tetra Tech employees at different times, and all uploaded by MVP to the FERC website as a single filing, but without any indexing whatsoever to guide the reader’s approach to the enormous amount of information being proffered. Because there has been no effort whatsoever on the part of Tetra Tech or MVP to index this heterogeneous collection of documents, the burden falls on the reader to perform the required indexing. The task of finding, reading, and understanding the appendices and other studies and source materials referenced by the Tetra Tech authors throughout the inconsistently paginated and frequently un-paginated May 10 filing is onerously time consuming. Without an understanding of the content of those appendices and other referenced studies and source materials, the narratives are inscrutable. If MVP is unwilling or unable to devote the staff time to perform a clerical task such as indexing a massive filing for the benefit of the public served by NEPA, why should the public entrust MVP with the duties and responsibilities associated with building and maintaining the MVP pipeline?

FERC’s inexpert handling of the massive amount of information generated as a requirement of NEPA imposes – on its own merit -- an adverse environmental impact, because it significantly adds to the difficulty of the public’s participation in the NEPA process and, as a result, restricts the flow of information that is the *sine qua non* of NEPA. Written on July 4, this criticism of FERC’s handling of the NEPA-mandated environmental review for the MVP pipeline is a plea for reform -- reform of a process that, as currently conducted, violates NEPA’s legally-mandated requirement of public participation.

To avoid confusion that would result from using the term “Mountain Valley Pipeline” to designate both the proposed pipeline project as well as the corporate/legal entity which is seeking approval of the pipeline, for the purposes of this discussion, we will:

- designate the corporate/legal entity seeking approval of the project as “MVP”, and
- designate the proposed pipeline project as “MVP pipeline”.

TETRA TECH’S MINIMALIST METHDOLOGY

Introduction to Tetra Tech’s technology

In this section we critique the methodologies used by MVP’s cultural resources contractor, Tetra Tech, for assessing the impacts to historic resources that would result from construction of the MVP pipeline. In the chart below, we (1) list all the techniques and technologies employed by Tetra Tech to attempt to portray the MVP pipeline as having no significant impact on historic resources in Virginia; (2) list all the documents and page numbers where the concerned reader who is interested in understanding Tetra Tech’s techniques and technologies must search within MVP’s massive and unsystematically organized May 10 filing; and (3) explain why each of the techniques and technologies employed by Tetra Tech fails to substantiate the conclusion that Tetra Tech and MVP have attempted to use them for – to claim that the MVP pipeline will have no significant adverse effects whatsoever on historic resources in Virginia.

Note: page numbers referenced in the chart, below, are page numbers generated by the PDF software used for storing and uploading the documents to the FERC website. The documents contained within MVP’s May 10 filing, as prepared by Tetra Tech and discussed above, do not employ a systematic or coordinated page numbering or indexing system, and many of the documents do not have any page numbers whatsoever. The total absence of page numbering and/or topical or chronological indexing thwarts the public’s ability to read, understand, and comment on the Tetra Tech documents, and is in contradiction to the spirit of NEPA.

Techniques and technologies described in Accession #20170511-5018 to support MVP’s claim that the MVP pipeline will result in no adverse impacts to historic resources

TECHNIQUES & TECHNOLOGIES USED BY TETRA TECH TO ASSESS THE MVP PIPELINE’S IMPACTS TO HISTORIC RESOURCES	DOCUMENTS SUBMITTED UNDER ACCESSION #20170511-5018 CONTAINING REFERENCES TO THIS TECHNIQUE OR TECHNOLOGY	PAGE NUMBERS IN EACH DOCUMENT WHERE THIS TECHNIQUE OR TECHNOLOGY IS REFERENCED	HOW THIS TECHNIQUE OR TECHNOLOGY IS USED BY TETRA TECH TO SUPPORT MVP’S CLAIM OF “NO ADVERSE IMPACTS”
DEM – Digital Elevation Modeling	DR5 – Cultural 5 Part 1 of 7	As “Digital Elevation Modeling” 210, 227 As “DEM” 14, 18, 19, 169, 171, 175, 177, 182, 210, 212, 226, 227, 287, 288	Please see first step below.

TECHNIQUES & TECHNOLOGIES USED BY TETRA TECH TO ASSESS THE MVP PIPELINE'S IMPACTS TO HISTORIC RESOURCES	DOCUMENTS SUBMITTED UNDER ACCESSION #20170511-5018 CONTAINING REFERENCES TO THIS TECHNIQUE OR TECHNOLOGY	PAGE NUMBERS IN EACH DOCUMENT WHERE THIS TECHNIQUE OR TECHNOLOGY IS REFERENCED	HOW THIS TECHNIQUE OR TECHNOLOGY IS USED BY TETRA TECH TO SUPPORT MVP'S CLAIM OF "NO ADVERSE IMPACTS"
NLCD – National Land Cover Database	DR5 – Cultural 5 Part 1 of 7	As "National Land Cover Database" 169, 182, 196, 210, 227, 287, 288 As "NLCD" 13, 18, 19, 32, 169, 175, 179, 182, 196, 210, 223, 225, 227, 231-239, 242-270, 272-282, 287, 288, 301-303, 305, 306-310, 312-314, 317, 318, 320-322, 324-373, 446-462, 507, 508	Please see second step below.
Viewshed and Viewpoint Analysis	DR5 – Cultural 5 Part 1 of 7 Task 2	13, 18, 19, 32, 170, 171, 176, 177, 198, 200, 284, 286, 287, 288, 289, 292, 374-432	Please see third step below.
Assessment of historic resources in terms of the criteria under which the properties were considered historically significant, and evaluating whether the introduction of Project features has the potential to adversely affect the property's integrity	DR5 – Cultural 5 Part 1 of 7 Task 4	13, 17, 19, 21, 23, 25, 27, 31, 32, 33, 34, 36, 39, 40, 56, 57, 171, 181, 198, 200, 204, 211, 212, 288, 298, 303, 305, 310, 311, 321, 322, 446-462	Please see fourth step below.
Photo simulations to provide visual confirmation of the findings	DR5 – Cultural 5 Part 1 of 7 Task 4	See above.	Please see fifth step below.
KOP – Key Observation Points	DR5 – Cultural 5 Part 1 of 7 Task 4, Step 2	As "key observation point" 25, 172, 178, 181, 183-190, 298, 309, 312, 321, 453, 455, 461 As "KOP" 25, 26, 31, 33, 34, 172, 178, 181, 182, 183-190, 508	Please see sixth step below.
	DR5 – Cultural 5 Part 2 of 7	As "KOP" 32-39, 41-56	
	DR5 – Cultural 5 Part 3 of 7	As "KOP" 17, 225	
	DR5 – Cultural 5 Part 4 of 7	As "KOP" 22, 28, 29, 30, 50, 54, 68, 72-118	
	DR5 – Cultural 5 Part 5 of 7	As "KOP" 2-69, 84-87, 92-95	

TECHNIQUES & TECHNOLOGIES USED BY TETRA TECH TO ASSESS THE MVP PIPELINE'S IMPACTS TO HISTORIC RESOURCES	DOCUMENTS SUBMITTED UNDER ACCESSION #20170511-5018 CONTAINING REFERENCES TO THIS TECHNIQUE OR TECHNOLOGY	PAGE NUMBERS IN EACH DOCUMENT WHERE THIS TECHNIQUE OR TECHNOLOGY IS REFERENCED	HOW THIS TECHNIQUE OR TECHNOLOGY IS USED BY TETRA TECH TO SUPPORT MVP'S CLAIM OF "NO ADVERSE IMPACTS"
	DR5 – Cultural 5 Part 6 of 7	As "KOP" 2, 4, 6, 8, 10, 12, 14, 16, 18, 20, 22, 24, 26, 28, 30, 32, 34, 36, 38, 40, 42, 44, 46, 48, 50, 52, 54, 56, 58, 60, 62, 64, 66, 68, 70, 72, 74, 76, 78, 80, 82, 84, 86, 88, 90, 92, 94	
Blue Ridge Parkway Vistas	DR5 – Cultural 5 Part 3 of 7	6,8,11-18, 21, 225-262	Please see seventh step below.
	DR5 – Cultural 5 Part 4 of 7	2-6	

Tetra Tech's failed assessment of impacts

Below we describe how Tetra Tech's documentation contained within the May 10 filing employs a series of techniques and technological analyses rendering the arbitrary and capricious conclusion that the MVP pipeline would have no adverse impacts whatsoever to any historic resources in Virginia.

The **first step** employed by Tetra Tech to render this conclusion was to use Digital Elevation Modeling (DEM) to adjust the size of the Area of Potential Effect (APE) so that it would be narrower in areas of lower elevation and wider in areas of higher elevation. The shrinking of the APE at lower elevations proceeded on the assumption that the viewshed is longer at higher elevations than at lower elevations, and that a hypothetical observer might be more likely to see the pipeline while standing at a historic building inside the APE at higher elevation. This redefinition of the APE so that it would be narrower at lower elevations and wider a higher elevations was approved by Virginia Department of Historic Resources (VDHR) in a letter to Tetra Tech dated December 12, 2014. Henceforward, the APE used in the Section 106 process for the MVP pipeline would be this new re-shaped APE, called the "Indirect APE".

The **second step** employed by Tetra Tech was the use of National Land Cover Database (NLCD). By superimposing on their digital maps the virtual impact of tree cover, this technology allowed Tetra Tech to eliminate additional historic buildings from the list of those at which a hypothetical observer would be able to view the pipeline. Once again, as in the use of Digital Elevation Modeling (described above), the hypothetical observer's visual experience at a fixed point adjacent to a potentially at-risk historic building within the Indirect APE was used as the gauge to assess whether the pipeline would have an

adverse effect on that historic building. If the hypothetical observer stood (a) next to a historic building inside the newly narrowed Indirect APE and (b) within sight of the newly added NLCD tree cover, the virtually-defined ability to view the pipeline from that vantage point was used as an indicator that the historic building in question had not yet been eliminated from the list of those potentially adversely impacted by the pipeline, and the building was sent on to the third step.

In the **third step**, Viewshed and Viewpoint analysis, Tetra Tech eliminated more potentially at-risk historic buildings from the list of those from which the hypothetical observer standing outside the building could be assumed to be able to see the pipeline corridor. This was done by viewing the historic buildings in question on Google Earth Ground View. It was at this step that Tetra Tech began employing three categories to rank the obtrusiveness of the view of the pipeline from the standpoint of the hypothetical observer positioned next to a historic building. A highly obtrusive view of the pipeline would be called “Dominant,” a less-obtrusive view “Co-Dominant,” and a least obtrusive view, “Inferior.” The potentially at-risk historic buildings for which the view of the pipeline had been ranked “Dominant” were sent to the fourth step. The others were dropped from consideration.

The **fourth step** invoked the National Register of Historic Places’ eligibility criteria in an attempt to downplay the significance of the pipeline’s visual impact to those historic buildings remaining on the list after steps one through three. As narrated by Tetra Tech in DR5 – Cultural 5, Part 1 of 4, “There would be a low potential for the Project to adversely affect a resource eligible only under Criterion C that does not derive its significance from the surrounding landscape and that is not subjected to direct impacts (not located in the direct APE). The Project would not affect the property’s ability to convey its historic significance according to Criterion C.” Tetra Tech continues, “There would be high potential for the Project to adversely affect a resource eligible under Criterion A that derives its significance from the surrounding landscape, and that is subjected to indirect impacts. The Project could potentially affect the property’s ability to convey its historic significance according to Criterion A.” A historic building was dropped from the list of potentially at-risk buildings if Tetra Tech deemed that the hypothetical observer’s view of the pipeline from that building would not somehow contradict the building’s historic significance under National Register Criterion A.

In the **fifth step**, Tetra Tech employed photo simulations.

It is important to note that this is the first and only time in its procedures for determining MVP pipeline impacts to historic resources that Tetra Tech (a) temporarily halts the practice of restricting its consideration of pipeline impacts to visual effects experienced by the hypothetical viewer standing next to a potentially at-risk historic building inside the indirect APE, and (b) considers impacts to rural historic districts. As a result of this

step, Tetra Tech provides a list of rural historic districts rated “high potential” for adverse impacts, due to the fact that their National Register eligibility derives in large part from their significance under Criterion A, which Tetra Tech interprets to mean that they derive their significance from the surrounding landscape.

Even though Tetra Tech had, in steps one through four, restricted consideration of significance under National Register criteria to historic buildings, in this fifth step, Tetra Tech inexplicably begins to integrate rural historic districts into the discussion.

Tetra Tech’s list of six rural historic districts deemed significant under Criterion A includes: Newport Historic District, Greater Newport Rural Historic District, Big Stony Creek Historic District, North Fork Valley Rural Historic District, Bent Mountain Rural Historic District, and Coles-Terry Rural Historic District.

Paradoxically, in the **sixth step**, involving use of Key Observation Points (KOP), Tetra Tech resumed its practice of restricting consideration of impacts to what could be seen by the hypothetical viewer standing next to a historic building. The historic buildings used for this exercise were all located within one of the six rural historic districts identified in step five as having “high potential” for adverse impacts. Tetra Tech arbitrarily designated a small number of historic buildings inside each of these six rural historic districts as KOPs, from which it performed its now-familiar analysis of whether the built pipeline would be visible by an observer standing next to the building. If the MVP pipeline was found not to be visible from any of the KOPs inside a district, Tetra Tech concluded that the pipeline would have no adverse impact to the entire district.

The KOP analysis enabled Tetra Tech to eliminate all six historic districts in question from the list of historic properties adversely impacted by the MVP pipeline. For example, throughout the entire 2,600 acres of the Coles-Terry Rural Historic District in Roanoke County, Tetra Tech selected only two historic buildings inside the district to serve as KOPs. In finding that the view of the constructed pipeline would be minimal from these two buildings, Tetra Tech concluded that the pipeline would have no adverse impacts to the entire 2,600-acre district.

The **seventh step** continues Tetra Tech’s practice of arbitrary selection of points from which to assess whether a hypothetical observer could view the built pipeline from that point. In the case of the Blue Ridge Parkway, Tetra Tech selected 25 scenic vistas currently under management by the Blue Ridge Parkway, located within five miles on either side of the place where the MVP pipeline would cross the Parkway at Adney Gap. At each of these Blue Ridge Parkway vistas, Tetra Tech predictably found that the MVP pipeline would not be visible by the hypothetical observer at that location or, if the pipeline would be visible, it would blend into the surrounding landscape and vegetation and thus render no adverse impact to the Parkway.

Tetra Tech inexplicably ignores the “spaces between” buildings

The assumption employed by Tetra Tech that the MVP pipeline’s potential to adversely impact rural historic districts lies exclusively in whether the pipeline would be visible from historic buildings thereon is wholly untenable. Nowhere in National Park Service Bulletin 30 is it stated or implied that a rural historic district’s significance can or should be assessed solely on the basis of what can be seen from the district’s buildings, or from arbitrarily assigned “vistas” or “key observation points”. Tetra Tech’s analysis, as described in these comments, imposes an arbitrary and capricious denial of the MVP pipeline’s impacts to the landscape and topographic features of rural historic districts in Virginia. Tetra Tech’s methodology is anathema to the preservation standards supported by both the National Park Service and the National Register of Historic Places.

Headwaters of the Roanoke River contribute to historic integrity

The MVP pipeline will cross the headwaters of the South Fork of the Roanoke River at Bottom Creek, at a location within the Coles-Terry Rural Historic District. The headwaters formed by Bottom Creek and Laurel Creek are written about in histories of Bent Mountain. One such history was written by Grace Fortescue Terry, whose father was one of the founders of the 19th century settlement comprising the Coles-Terry Rural Historic District. Her manuscript was issued in typewritten format in 1957 and later revised and published in an article titled “Recollections of Bent Mountain, Virginia” in the Journal of the Roanoke Historical Society, Winter, 1967. Said Terry's history of Bent Mountain:

Following the beginnings of Roanoke River, it is indeed so circuitous that when it passes Shawsville and makes a sharp right turn, it seems to be “aiming” to return to the place of its birth on the east side of Poore Mountain, where several deep hollows – clefts in the range – cool little springs appear among mossed rocks and fern fronds, and in springtime, columbines, windflowers and ethereal violets and bright cerise of Adder's tongue. Down they wander, collecting companions on the way, merging with more and more spring branches. Rivulets, with whispering infant voices, turning slowly northward, grow and mature into “Bottom's Creek”, and its cascading becomes a staccato chorus, that hurries to join forces with another liquid traveller from Bent Mountain's Eastern border, for an interlude of tranquility, traversing swamps and meadows, until encountering a blockage of rocks and a sharp obstruction of hills, it gathers force and rises in mimic rage to pour into a gorge where it was later harnessed to give power to operate the first “Bent Mill”, and from that useful development comes its present name, “Mill Creek”.

Returning to Street's Entry, we find other springs beginning in a higher cut or bowl of rocks, seeking companionship below in the seaward adventuring through twilight shadows of hemlock, their gothic spires pointing heavenward – their roots

anchored in mosses and ferns, and shaded by barricades of Rhododendron and Laurel – thus, “Laurel Creek” emerges and plunges in rapids downward to join Bottom and Mill Creek. Then, spectacularly, dramatically, it hurls itself hundreds of feet, fiercely through a great rock-walled gorge, several miles of tumult, to presently grow calm and become a placid river, passing “Hot” or Crockett Springs, on past Allegheny Springs to Shawsville. There it sharply reverses its course and almost completes a circle to pass Big Spring and Elliston, as Roanoke River, at the foot of Poore Mountain, where its infantile venture began. What an odyssey to follow it to its terminus in Albemarle Sound! An epic of the soul of many waters that fulfill their migratory destiny and final union with the “Ocean of Eternity”.

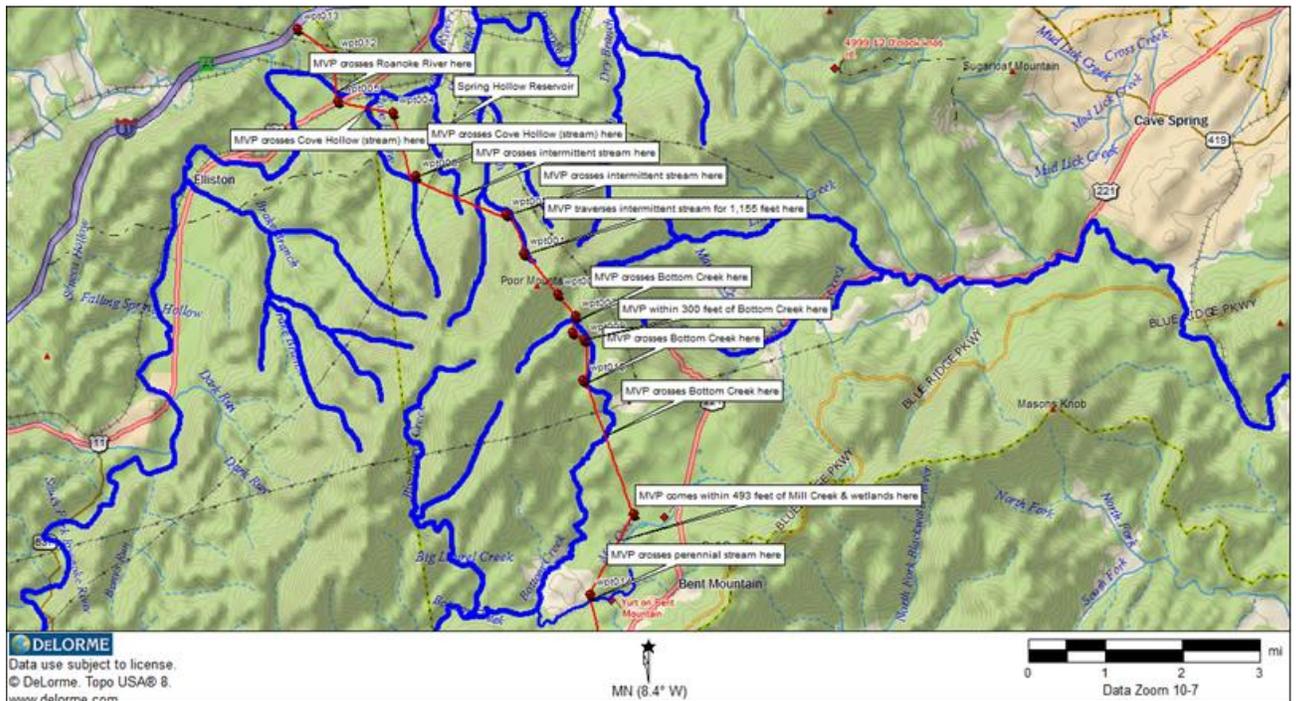
Another history of Poor Mountain was written by Lee Pendleton in 1976 while he was a patient at the Salem Veterans Affairs Medical Center in Salem, VA. Here is an excerpt of Pendleton's description of a recreational expedition taken by a small group of local youth to the top of Poor Mountain, organized by an individual named “Daddy Mack”. The group were riding mules and on foot. Pendleton describes what they saw, including the springs of Laurel Creek and the upland portion of Bottom Creek, which are all inside the Coles-Terry Rural Historic District:

He [Mr. Barnett] showed them the spring gushing out of the top of the mountain, freestone, head of Laurel Creek. Barnett had fenced in the spring, but Coles Terry who had as much land as Barnett on the other side, sued Barnett and both sides had surveys made (have seen Barnett's map), but before it came to trial, Barnett died with cancer and told his boys to drop the suit. Its a wonderful thing how this water gushes up on top of the mountain. It was a little early for lunch, but they were hungry and water handy, so they took the mules out and gave them water and corn and let them eat hay out of the wagon. The mules securely tied, they walked out to the west where there is a fire tower now. A little farther and they could have seen Bottom Creek plunging several hundred feet down the mountain near the present girls' camp. . . .

Yet another history, a book titled *History of Roanoke County* (George S. Jack, 1912), includes in its chapter on Bent Mountain the following description:

After ascending the mountain a beautiful plateau, practically level, stretches out for miles. The land is well watered by streams and branches flowing from innumerable springs of free-stone water, almost ice cold. Situated some two thousand seven hundred feet above sea level, there is always a delightful breeze in the hottest summer weather and blankets are in demand for sleeping purposes at all seasons of the year.

The headwaters of the South Fork of the Roanoke River can be seen, in the excerpts of histories of Bent and Poor Mountain quoted above, to play an integral role in the history of Poor Mountain and the integrity of the Coles-Terry Rural Historic District. The MVP pipeline crosses through the area of springs and first order streams described in the Terry narrative, and crosses Bottom Creek four times. Please see map, below, illustrating that the MVP pipeline would cross mapped Waters of the U.S. 13 times near the origin of the South Fork of the Roanoke River, much of this inside the Coles-Terry Rural Historic District. How many unmapped, unnamed tributaries and streams that do not appear on a topographic map are crossed?



Map illustrating the MVP pipeline's crossing of the headwater streams at the origin of the South Fork of the Roanoke River

Construction of the MVP through the exquisitely pristine, irreplaceable headwaters of the Roanoke River would undermine the very bedrock of Roanoke County and southwestern Virginia's cherished historic landscapes.

Tetra Tech's analysis fails utterly to comprehend the devastating impact that the MVP pipeline would have to these historically significant aquatic features within the Coles-Terry Rural Historic District.

Tetra Tech fails to consider impacts of as seen from crest of Poor Mountain

In addition to failing to address impacts to historically significant aquatic features within the Coles-Terry Rural Historic District, the May 10 filing fails utterly to document the dramatic alteration of visual elements of the Coles-Terry Rural Historic District as viewed from the top of the district along Honeysuckle Road. This is the point where the MVP pipeline begins its descent down the eastern slope of Poor Mountain into the Bent Mountain community. Standing on Honeysuckle Road, the observer looking down at the MVP pipeline's flat, treeless "stripe" will have an experience similar to that of riding a roller coaster in an amusement park. This is precisely the type of industrial development that will destroy the integrity of the Coles-Terry Rural Historic District in perpetuity. The drastic interruption of tree cover along the crest of Poor Mountain, the drastic interruption of the variegated rocky topography of that beautiful point on Poor Mountain, and the visual impact of the MVP pipeline's sheer vertical descent down the extraordinarily steep slope of Poor Mountain will all impose an immense impairment of the significance of the Coles Terry Rural Historic District and of the scenic qualities of this mountain.

It is inconceivable how or why Tetra Tech's reams of analysis in the May 10 filing failed to apprehend and document this extraordinary impact.

Preserve Roanoke objects to the arbitrary and inappropriate methodology employed by Tetra Tech in its process of finding that the Mountain Valley Pipeline will result in no adverse impacts to historic properties in Virginia, and particularly to the historic districts located within Roanoke County, including the Coles-Terry Rural Historic District and the Blue Ridge Parkway.

MVP PIPELINE'S IMPACTS TO BLUE RIDGE PARKWAY

Tetra Tech's calculated dismissal of the dire impacts to the significant historic and scenic values of the Blue Ridge Parkway at Adney Gap in Roanoke County, VA resulting from the construction of the MVP pipeline is an affront to the proud commitment that the National Park Service has made to preserving Adney Gap as a visual reminder of traditional, locally-significant, non-industrialized farming practices in the southeastern U.S.

Significance of the Blue Ridge Parkway

As discussed in Richard Quin, *Blue Ridge Parkway, HAER REPORT No. NC-42* (Historic American Engineering Record, National Park Service, U.S. Department of the Interior, 1997), the Blue Ridge Parkway is a historic resource worthy of preservation in its historic, non-industrialized condition. Said Quin:

“Blue Ridge Parkway was the first long-distance rural parkway developed by the National Park Service. Its designers adapted parkway development strategies originating in suburban commuter routes and metropolitan park systems and expanded them to a regional scale, creating a scenic motorway linking two of the most prominent eastern national parks. The parkway was conceived as a multiple-purpose corridor that would fulfill a variety of social, recreational, environmental, and pragmatic functions. In addition to preserving and showcasing attractive natural scenery, the parkway was designed to display the traditional cultural landscapes of the southern Appalachian highlands, providing visitors with an idealized vision of America's rural heritage. At frequent intervals the parkway borders expand to encompass smaller parks, recreational areas, and historic sites, many of which include picnic areas and/or overnight accommodations. Blue Ridge Parkway's attractive natural and cultural features, its diverse recreational attractions, and its relatively accessible East Coast location have long made it the most heavily visited unit of the National Park System.”

Quin continues his description of the Parkway:

“The Blue Ridge Parkway is many things. It is the longest road planned as a single unit in the United States. It is an elongated park, protecting significant mountain landscapes far beyond the shoulders of the road itself. It is a series of nature preserves replete with high mountain fastnesses, splendid natural gardens of flowering mountain plants, waterfalls and water gaps, deep forests and upland meadows. It is a collection of panoramic views extending into far-off states, making it in one sense the "largest park in the world," as the boundaries of its limited right-of-way are rarely apparent and miles of the adjacent countryside appear to be a part of the protected scene. The parkway is an historic cultural landscape preserving the rough-hewn log cabin of the mountain pioneer, the summer home of a textile magnate, and traces of early industries and transportation networks. It is miles of split-rail fence, moss on a wood shingle roof, broomcorn and flax in a pioneer garden. It is the fleeting glimpse of a deer, a wild turkey or a red fox, or for those who prefer their animal life less wild, a herd of cows lolling in a pasture or horses romping in a field. It is a chain of recreational areas, offering motorists a place to picnic in the woods, a place to sleep overnight in a campground or a charming lodge, to refuel their vehicles, enjoy a meal, or purchase a piece of mountaineer handiwork. It is the product of a series of major public works projects that helped the Appalachian region climb out the depths of the Great Depression. The Blue Ridge Parkway is all these things and much more, therefore it should come as no surprise that this is the most heavily visited unit of the National Park Service.

The Blue Ridge Parkway provides frequent expansive views across a changing countryside, mixing scenes of untouched natural beauty with landscapes reshaped by

human handiwork. In addition to featuring some of the finest rural and mountain scenery in the east, the parkway presents motorists with reminders of the culture and history of the Southern Highlands. Traveling the parkway was intended to be a "ride-a-while, stop-a-while" experience. At various stops and parks along the route, old log homes, a rustic mill, outbuildings and rail fences reflect the agricultural heritage of the mountain residents. A reconstructed segment of a logging railway, a restored lock from an antebellum canal, and sites of old mines and other works tell the story of early industries. Farm lands kept in agricultural production through an innovative land lease program maintain the "picture" of the rural landscape. The design and construction of such a road was no small feat, but the culmination of many efforts over long years."

A major theme in the development of the Blue Ridge Parkway is that it traverses an enormous variety of topographic and landscape features, and that the architects and engineers of the Parkway employed great care and sensitivity in designing the road so as to heighten the traveler's appreciation of the astonishing variety of landscapes and topography contributing to the Southern highlands' subtle and profound beauty. Unlike the Skyline Drive, the Parkway does not follow ridgelines exclusively. Rather, the Parkway's creators deliberately and painstakingly routed the roadway in such a fashion as to integrate it with lowland features such as farm fields, river bottoms, and flatlands, juxtaposed harmoniously with mountain ridges and escarpments found at the higher elevations.

This concept of engineering to enhance the traveler's appreciation of the variety and subtlety of the landscapes crossed by the Blue Ridge Parkway is nowhere expressed as eloquently and authoritatively as in S. Herbert Evison's 1959 interview with Blue Ridge Parkway Resident Landscape Architect, Stanley W. Abbott. Said Abbott:

"A Parkway like Blue Ridge has but one reason for existence, which is to please by revealing the charm and interest of the native American countryside. To accomplish that end requires the finest exercise of the several planning arts. Your composition is one of fields and fences, lakes and streams, and hills and valleys; and your problem is that of placing your roadway in such a position as best to reveal them. It is as if you were going with your camera through the countryside you wanted to photograph to greatest advantage--how long would you look for a spot from which to take your picture. So, the all-important factor was: Where is the road to be located? And you determine upon your location by these very large compositional considerations, balanced by other considerations, lesser but important, such as the opportunity for intimate glimpses into the deep woods and into the flora of those woods. This affords contrast to the heroic panorama--a stretch here along the crest, there on mountainside, along a valley stream, through the woods,

along the edge of a meadow, passing a mountain farmstead. There were the ingredients of variety and charm.

Then, having selected a route for the road, you get into the business of designing a road that fits the topography as sympathetically as it can be fit--the engineer, the landscape architect, the architect working together.

That takes a—well, it's almost a form of sculpture. It takes a third-dimensional mind and insight into what is the main contour of this particular land form, whether one broad curve or, sometimes--since nature doesn't always deplore a straight line—there are places where the road wanted to straighten out for a while because the conformation of the land straightened out; or there had been a straight cut farm field against a straight edge of woods.”

As inheritors of the remarkable “sculpture” that is the Blue Ridge Parkway as described by Abbott, it is incumbent on 21st century stakeholders to maintain the subtle and exquisite conformations of the Parkway as important relics of the cultural, economic, aesthetic, and conservation milieu of the middle-to-late 20th century period during which the Parkway was designed, constructed, and enjoyed by motorists.

Special significance of Adney Gap section of the Blue Ridge Parkway

The Blue Ridge Parkway's Adney Gap, through which the proposed MVP has been routed, has special cultural and historic significance. In an August 30, 1938 press release, The U.S. Department of the Interior announced the anticipated opening to traffic of the first segments of the Blue Ridge Parkway. The document says, “Fifty-five miles of the parkway road in Virginia have already been completed as to grading and drainage, and surfacing contracts are now under way. One unit of 8-1/2 miles is between Rock Fish and Jarman's Gap, and the other is the 47 miles between Adney Gap and Pinnacles of Dan.” This press release, a copy of which was obtained from the National Archives in College Park, MD on April 29, 2016, reveals that Adney Gap was among the first portions of the Blue Ridge Parkway to be completed. This historical fact increases the significance of Adney Gap to the historic narrative of the Parkway.

The historical significance of Adney Gap is not limited to that conferred by its role in the development of the Blue Ridge Parkway however, but also extends back to the mid-19th century. Adney Gap is part of the 20,000 acre tract of land that was deeded to General Andrew Lewis by General George Washington as a reward for Andrew's service in Indian wars and the Revolutionary War. 6,000 to 8,000 acres of the Andrew Lewis tract were purchased from Lewis's heirs by brothers, Tazewell and Warfield Price. According to Deedie Kagey's history of Roanoke County titled *When Past is Prologue* (Roanoke

County Sesquicentennial Committee, 1988), Tazewell Price began cultivating his land in 1860. The house that Tazewell Price built in 1871, known as “Les Landes,” is located one-half mile north of the Adney Gap entrance to the Blue Ridge Parkway off U.S. 221 and is eligible for listing on the National Register of Historic Places. “Les Landes” and the structure's beautiful rural historic setting near Adney Gap contribute to the historical integrity and scenic values of the Blue Ridge Parkway.

Permanent, not temporary impacts

The construction of the MVP across Adney Gap is likely to result in permanent, not temporary, visual effects that would impair the historic and cultural values of the Blue Ridge Parkway Historic District. The MVP will impose a flat stripe of highly condensed soil – called a “grassy highway” by one resident of Roanoke County, VA – across the historic farm fields of Adney Gap, resulting in an unavoidable interruption of the visitor's experience of the Parkway's historic/scenic attributes.

According to Quinn's *Blue Ridge Parkway* (cited above), farm lands within the Parkway that have been kept in production through the Parkway's innovative agricultural lease program maintain the “picture” of the rural landscape. The Adney Gap farm fields have been actively enrolled in the Blue Ridge Parkway Agricultural Lease Program since 1979. By enrolling Adney Gap in this program, the Blue Ridge Parkway has ensured that the traditional farming practices begun there during the mid-19th century will continue in the 21st century. The historic, breathtakingly beautiful, and locally cherished fields at Adney Gap do in fact offer a scenic reminder of our region's heritage of agriculture and rural life.

The excavation that would result from construction of the MVP, along with the use of heavy machinery, disruption of soil strata, severe compaction of soil on the pipeline right-of-way, and imposition of non-locally adapted grass species as ground cover, virtually guarantee that the Adney Gap site will never return to its former condition.

The MVP will permanently impose the footprint of 21st century industrialization on the 19th century landscape of Adney Gap. This is an inappropriate use of the Blue Ridge Parkway and should be avoided in the interest of safekeeping this national treasure for the enjoyment and edification of many future generations of Americans.

Use of herbicides in pipeline corridor

Unless MVP can offer a legally binding agreement prohibiting in perpetuity all application of herbicides by all pipeline easement holders on the MVP pipeline corridor, it is unlikely that farmers will use the pipeline corridor for cattle grazing anywhere along the MVP pipeline route, due to the uncertainty of where and when the pipeline corridor would be managed with herbicides. The result of this uncertainty is that the farmers currently using Adney Gap for cattle grazing, in the interest of protecting their cattle from

exposure to grass that has been treated with herbicides, will fence the scenic Adney Gap fields to prevent their cattle from grazing on the MVP pipeline corridor. This fencing will drastically interfere with the viewer's experience of the elegantly expansive contours of Adney Gap. If the Blue Ridge Parkway prohibits the Adney Gap farmers from erecting fencing to keep their cattle out of the herbicide treated pipeline corridor, the farmers will likely discontinue their participation in the Parkway's Agricultural Lease Program. As a result of this discontinuation, the long-preserved, scenic and significantly historic appearance of Adney Gap as a traditional cattle grazing field will be forfeited.

Impacts to Coles-Terry Rural Historic District will affect the integrity of the Blue Ridge Parkway Historic District

The Coles-Terry Rural Historic District, which comprises a 2.4-mile wide expanse of land at the crest and on the east-facing slope of Poor Mountain, is visible from the Poor Mountain Overlook on the Blue Ridge Parkway. The construction of the MVP through the Coles-Terry Rural Historic District will drastically alter the appearance of Poor Mountain as viewed from the Poor Mountain Overlook, as well as from many points on U.S. 221 in Bent Mountain. The imposition of the MVP's treeless vertical "stripe" at the crest and down the eastern slope of Poor Mountain – indelibly demarcating 21st century industrialization – will permanently impair the appearance of the mountain as viewed from the Parkway. This incursion will result in further adverse effects to integrity of the Blue Ridge Parkway Historic District.

Please see images below, created by Hill Studio, Roanoke, VA, illustrating the view of the MVP pipeline from the Poor Mountain Overlook on the Blue Ridge Parkway. Please compare these high-quality visualizations with the inexplicably low-quality images of the same view offered by Tetra Tech in its discussion of Blue Ridge Parkway vistas (see **step seven**, above). Tetra Tech's dismissive statement that the MVP pipeline corridor, as viewed from the Poor Mountain Overlook, would blend in visually with other utility corridors on Poor Mountain is egregiously untenable. We beg to differ.



Hill Studio visualization: view from Poor Mountain Overlook on Blue Ridge Parkway, BEFORE construction of the MVP pipeline



Hill Studio visualization: view from Poor Mountain Overlook on Blue Ridge Parkway, AFTER construction of the MVP pipeline

VDHR'S GUIDANCE IS PATENTLY IGNORED

In its consultation with Tetra Tech, Virginia Department of Historic Resources (VDHR) requested early and repeatedly that the analysis of the MVP pipeline's impacts to Virginia's historic resources consider impacts to the landscapes surrounding historic buildings contained within historic districts, and not restrict its consideration to the districts' buildings in isolation from these landscape and topographic features. The

following are examples of VDHR's communications with Tetra Tech in which VDHR tried to steer Tetra Tech away from an exclusive focus on impacts to historic buildings. (Meeting notes quoted below are from DR5 – Cultural 5, Part 1 of 7, Appendix A, Correspondence and Consultation.)

In an April 21, 2015 meeting with Tetra Tech, VDHR staff requested that Tetra Tech's survey "consider the spaces between contributing resources" and "consider potential effects to historic districts as a whole".

Again, in a November 15, 2016 meeting with Tetra Tech, VDHR staff asked Tetra Tech to "keep in mind how a visitor to a rural historic district would experience the district – the entry points to the district and key areas within the district possibly along historic roads and features within the district."

The November 15, 2016 meeting notes written by Tetra Tech, say, "Roger [Kirchen] suggested attention to the pipeline's potential to affect undisturbed landscapes in which architectural resources are located within rural historic districts."

Thus from an early point in the process, VDHR was plainspoken in its directives to Tetra Tech to consider landscape and topographic features within each rural historic district crossed by the MVP pipeline.

The methodology described in MVP's May 10 filing stands as a deliberate and calculated affront to the guidance provided by VDHR, and a denial of the precepts of historic preservation embodied in the National Register of Historic Places, National Park Service Bulletin 30, and Section 106 of the National Historic Preservation Act.

CONCLUSION

Tetra Tech's analysis of the MVP pipeline's impacts to historic resources in Roanoke County and elsewhere in Virginia is an affront to the principals of federally-mandated historic preservation practice as established in U.S. laws and regulations and must be done over in a manner that conforms to the letter and spirit of those laws and regulations.

Sincerely,



Ann Rogers
Section 106 Coordinator, Blue Ridge Environmental Defense League
Member, Preserve Roanoke
Member, Roanoke County Pipeline Advisory Committee

cc:

Virginia Department of Historic Resources
County of Roanoke
Advisory Council on Historic Preservation
National Trust for Historic Preservation
Preservation Virginia
Andrea Ferster
Greater Newport Rural Historic District Committee
Preserve Montgomery County
Preserve Franklin