

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

)	
Mountain Valley Pipeline, LLC)	
)	CP16-10-000
Mountain Valley Pipeline Project)	
)	

**SUPPLEMENTAL INFORMATION IN SUPPORT OF PRESERVE CRAIG’S MOTION
FOR RECONSIDERATION AND CLARIFICATION OF NOTICE TO PROCEED WITH
CONSTRUCTION BETWEEN MILEPOSTS 217.1 AND 283.9**

On February 26, 2018, Preserve Craig filed a “Motion for Reconsideration and Clarification of Notice to Proceed with Construction between Mileposts 217.1 and 283.9.” *See* eLibrary no. 20180226-5131. It requested that the Director of the Office of Energy Projects (OEP) reconsider and clarify the Notice to Proceed (*see* eLibrary no. 20180216-3040) to exclude the Adlai Jones Family Farm lands pending resolution of potential adverse effects to historic resources on those lands, and otherwise reconsider issuance of the Notice to Proceed in advance of the Commission’s decision on the merits of rehearing. That Motion is still pending.

On March 8, 2018, the Advisory Council on Historic Preservation (ACHP) filed comments on Mountain Valley Pipeline, LLC’s (Mountain Valley) revised Treatment Plans for the rural historic districts that will be adversely affected by the Mountain Valley Pipeline (MVP) Project. *See* letter from Charlene Vaughn to James Martin (Mar. 8, 2018). The ACHP generally found the Treatment Plans to be “reasonable and balanced.” *Id.* at 2. However, it noted outstanding concerns raised by consulting parties and stakeholders, and specifically highlighted the need for further consideration regarding potential project effects on the Adlai Jones Farm. *Id.* at 2.

On March 9, 2018, the Virginia Department of Historic Resources (VDHR) commented on the revised Treatment Plans, expressing similar concerns regarding errors in the mapping of the Adlai Jones Farm. *See* letter from Roger W. Kirchen to Paul Friedman (Mar. 9, 2018), p. 1, Attachment 1. It attributed these errors to a combination of consultant error and errors within VDHR's digital databases. *See id.* at Attachment 1. It recommended preparation of a corrected impacts analysis. *See id.*

The ACHP's and VDHR's comments support Preserve Craig's request for consultation between OEP Staff, or Mountain Valley as its delegate, the Jones Family, and Craig County regarding the potential project effects on the Adlai Jones Farm and the effectiveness of proposed measures to resolve adverse effects *before* any pre-construction or construction activity is authorized on or adjacent to those lands. This consultation will allow OEP Staff to correct the errors identified by VDHR, the Jones Family, and other stakeholders, and avoid unnecessary harm to historic resources, consistent with the Federal Energy Regulatory Commission's and other Cooperating Agencies' obligations under the National Historic Preservation Act (NHPA). Further, OEP Staff must address the improper exclusion of Craig County from the consultation process under Section 106 of the NHPA due to Mountain Valley's error in reporting the Adlai Jones Farm lands as existing entirely in Giles County, rather than extending to Craig County.

In conclusion, Preserve Craig requests that OEP Staff consider this supplemental information in support of its pending Motion for Reconsideration and Clarification.

Dated: March 12, 2018

Respectfully submitted,



Richard Roos-Collins

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Attorneys for PRESERVE CRAIG

DECLARATION OF SERVICE

Mountain Valley Pipeline, LLC's Mountain Valley Pipeline Project (CP16-10-000)

I, Tiffany Poovaiah, declare that I today served the attached "Supplemental Information in Support of Preserve Craig's Motion for Reconsideration and Clarification of Notice to Proceed with Construction Between Mileposts 217.1 and 283.9" 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: March 12, 2018

By:



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