

Blue Ridge Environmental Defense League

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MEMORANDUM

June 21, 2022

TO: Paul Friedman, Federal Energy Regulatory Commission

FROM: Ann Rogers, Section 106 Coordinator, Blue Ridge Environmental Defense League

CC via Email: Evelyn Tidlow, GAI
Megan Neylon, Mountain Valley Pipeline, LLC
SEARCH
Roger Kirchen, Virginia Dept. of Historic Resources
Mike Pulice, Virginia Dept. of Historic Resources
Richard Caywood, County of Roanoke
Kathy Chandler
Lois Waldron

SUBJECT: Request that FERC officially acknowledge Green Hollow Drive as a contributing resource inside the Bent Mountain Orchard Rural Historic District

This memo is offered in response to statements made in the Order Amending Certificate (“Order”) issued April 8, 2022, under Docket # CP21-57-000, for the Mountain Valley Pipeline (MVP).

In Section B.2.k. Cultural Resources, the Order states:

Kathy and James Chandler also state that the historic Green Hollow Road is a contributing resource to the Bent Mountain Apple Orchard Rural Historic District and is culturally significant.¹ The National Register of Historic Places (NRHP) Registration Form for the Bent Mountain Apple Orchard Rural Historic District indicated that “[a] remnant of the historic road network is visible at the entrance of the Hale Homestead (DHR ID #: 080-5731-0013) on Green Hollow Road.”² Green Hollow Road is illustrated on maps in the NRHP Registration Form, as are all local roads within the boundaries of the historic district. However, as stated in the EA, Green Hollow Road itself is not listed as a contributing resource to the Bent Mountain Apple Orchard Rural Historic District.

FERC’s claim, as cited above, that Green Hollow Drive (incorrectly called “Green Hollow Road” in the Order) is not a contributing resource in the Bent Mountain Orchard Rural Historic District contradicts the findings of The Evaluation Committee of the Virginia Department of Historic Resources, who made the following statement with regard to the District: “**Historic roads and/or road beds associated with the orchard industry can and should be considered contributing resources in the district, either collectively or separately.**” (source: email from Mike Pulice, Architectural Historian, Western Regional Office, Community Services Division, Virginia Department of Historic Resources, October 12, 2017).

I have provided extensive documentation on the subject of Green Hollow Drive's historic eligibility to FERC, MVP, and Tetra Tech. This documentation includes the following accession numbers:

accession # 20180130-5205
accession # 20180105-5141
accession # 20170908-5122 (32389539)
accession # 20170908-5122 (32389307)



Green Hollow Drive is shown intersecting with U.S. 221 on this 1963 USGS topographic map.

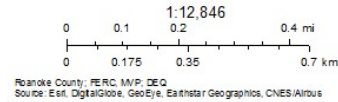
Map 1: USGA topographic map of segment of Bent Mountain Orchard Rural Historic District

FERC's failure to acknowledge the status of Green Hollow Drive as a contributing resource in the Bent Mountain Orchard Rural Historic District is of special concern because Green Hollow Drive has been designated and used as a pipeline access road for the MVP, resulting in alteration of its historic appearance through extensive re-grading and application of gravel. Please see a map illustrating the MVP pipeline access road superimposed on Green Hollow Drive, below.

Mountain Valley Pipeline Viewer



August 30, 2017



Map 2: Green Hollow Drive as MVP pipeline access road (source: Roanoke County map of Mountain Valley Pipeline at <https://gisweb.roanokecountyva.gov/pipeline/>)

In conclusion, Green Hollow Drive and all the other extant historic orchard roads inside the Bent Mountain Orchard Rural Historic District must be officially recognized by FERC as contributing resources inside the district, as designated by Virginia Department of Historic Resources.

I respectfully request that FERC's written statements denying the status of Green Hollow Drive as a contributing resource inside the Bent Mountain Orchard Rural Historic District be officially amended.

Thank you for your prompt attention to this request.

Attachment

Email dated October 12, 2017 from Mike Pulice, Architectural Historian, Western Regional Office, Community Services Division, Virginia Department of Historic Resources, relating the findings of The Evaluation Committee of the Virginia Department of Historic Resources that historic roads and/or road beds associated with the orchard industry can and should be considered contributing resources in the Bent Mountain Orchard Rural Historic District, either collectively or separately.

Subject: Bent Mtn Orchard RHD - good news!
From: Pulice, Michael (DHR) (Michael.Pulice@dhr.virginia.gov)
To: amelvin3@verizon.net;
Date: Thursday, October 12, 2017 11:51 AM

Hi Ann,

I presented your addendum to the original PIF to the DHR staff evaluation committee (ETeam) this morning. Their unanimous decision was that the proposed rural historic district (RHD) is eligible for the state and National Registers. So next, I will present the information to the State Review Board on December 14th in Richmond. Their decision will make it official, once and for all, that the district is eligible for both registers. I am confident that they will agree with the evaluation committee. Congratulations on your hard work finally paying off!

A couple notes from the ETeam discussion:

- 1) Any known prehistoric or historic archaeological sites should be included and discussed in a register nomination for the district. The district can have two separate periods of significance, such as 3000 BC - 500 AD and 1890 - 1972.
- 2) Historic roads and/or road beds associated with the orchard industry can and should be considered contributing resources in the district, either collectively or separately.

That's it! Let me know if you have any questions.

Mike

Mike Pulice

Architectural Historian

Western Regional Office

Community Services Division

Virginia Department of Historic Resources

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