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April 22, 2020

Via Federal Express

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State Corporation Commission
c/o Document Control Center
P.O. Box 2118
Richmond VA 23218-2188

In re: Application of Virginia Natural Gas, Inc. ("**Application**")
Case No. PUR 2019-00207

Please take note the undersigned and the law firm of Odin, Feldman & Pittleman, P.C. represent the Northern Virginia Criminal Justice Training Academy ("**NVCJTA**") with respect to the above-referenced Application. Please accept this submission as NVCJTA's Public Comment to the Application.

Background of NVCJTA

NVCJTA and the Prince William County Criminal Justice Training Academy jointly operate an Emergency Vehicle Operations Center ("**EVOC**") at 13170 Public Safety Drive, Nokesville, VA 20181. The EVOC provides state of the art driver training to more than 3,000 police officers and deputy sheriffs in the Northern Virginia region. It has been running since 2010 and serves as an integral and necessary component of training, ultimately graduating police officers within the Commonwealth of Virginia.

The following seventeen police and sheriffs' agencies utilize NVCJTA for training of recruits and personnel:

1. Alexandria Police Department;
2. Alexandria Sheriff's Office;
3. Arlington County Police Department;
4. Arlington County Sheriff's Office;
5. City of Fairfax Police Department;
6. Falls Church City Police Department;
7. Falls Church Sheriff's Office;
8. George Mason University Police Department;
9. Leesburg Police Department;
10. Loudoun County Sheriff's Office;

11. Manassas City Police Department;
12. Manassas Park City Police Department;
13. Town of Middleburg Police Department;
14. Northern Virginia Community College Police Department;
15. Purcellville Police Department;
16. Washington Metro Transit Police Department; and
17. Metropolitan Washington Airports Authority Police.

The EVOC is located on a 92-acre tract of land and consists of both an administrative building (containing four classrooms, staff offices, and a driving simulation room) and training grounds. The training grounds consists of a 1.1-mile Emergency Response Course Track (“*Emergency Response Course*”), a skid track and skid pan, which simulates driving on wet and icy roads for skid avoidance and skid recovery exercises, an urban environment that includes 4 signaled intersections, speed bumps, bridge grates, a cul-de-sac, and a railroad crossing, as well as a precision driving course.

The EVOC conducts training nearly every weekday and on several weekends throughout the calendar year. This training is not only for new recruits but also remedial training for those who have made poor decisions behind the wheel or been involved in vehicle accidents. The EVOC also offers training to member agency motorcycle squads, ATV units, Special Service vehicles, and vehicle crash investigation units.

In short, the EVOC is critical to the training of the Commonwealth’s law protection officers. There is no other suitable facility in the Northern Virginia region that is available to the users of the EVOC. Any damage to the facility or interference to its schedule would be a severe detriment to the officers serving all over the Commonwealth and the counties and constituents they serve.

VNG’s Application

On December 6, 2019, Virginia Natural Gas, Inc. (“*VNG*”) submitted its Application to the State Corporation Commission. It seeks to obtain approval for a proposed project known as the Header Improvement Project. VNG describes the Header Improvement Project as a system improvement project that gives VNG the operational capacity to ensure C4GT and other energy providers have the clean and reliable natural gas needed to serve Virginia residents and businesses. This Header Improvement Project includes an initiative to connect the current VNG pipeline system to an existing Transco Gas pipeline system. The proposed connection (“*Pipeline*”) crosses NVCJTA’s property, and more specifically, is currently planned to cross the NVCJTA’s Emergency Response Course.

NVCJTA's Public Safety Concerns

1. Construction of the Proposed Pipeline Would Impact Training and Delay Graduation of Recruits.

NVCJTA's paramount concern with the Application is that it could have a direct impact on the safety of the Commonwealth. As explained above, the EVOC trains individuals across the Commonwealth, from new recruits to experienced officers who need remedial training. Per the Virginia Department of Criminal Justice Services, police recruit officers are mandated to complete and pass the driver training curriculum during each academy session. The EVOC's schedule is planned to the day (and often hour) months in advance, so any interference with the schedule could impact recruits' graduating and entering the force.

Not only are there concerns of delays in scheduling necessary training, which could impact the performance of police officers, but NVCJTA also has concerns that construction of the Pipeline could interfere with their schedule such that willing and capable police recruits would not be able to meet their driving training curriculum on time and graduate. This would translate into a shortage of new officers. The public safety concerns of delaying remedial training or interfering with new eager and capable recruits from serving as public servants are self-evident.

2. Construction of the Proposed Pipeline under the Emergency Response Course Would Impact the Safety of Trainees and NVCJTA Staff on the Emergency Response Course.

The Pipeline detailed in the Application is currently planned to pass directly under NVCJTA's Emergency Response Course. This track has been created at great expense to ensure the safety of the trainees, and the engineering and construction of the Emergency Response Course was specifically constructed with the safety of the officers at the forefront. The Emergency Response Course is a 1.1-mile loop where police vehicles can achieve speeds between 85 and 100 miles per hour. As part of the training, officers learn to achieve extremely hard braking to slow the speeding vehicle down prior to turns on the track. Where the proposed route of the Pipeline currently crosses the track is the location where that heavy braking repeatedly occurs, and NVCJTA is highly concerned about any physical impact to the track in the form of bumps or cracks in the pavement or other changes to the surface that could negatively impact high speed driving. The safety concerns with such a track are apparent, and NVCJTA has gone through intense training, research, and financial resources to ensure that the Emergency Response Course's design serves to both train officers in high risk situations but also keep them safe.

Any construction under, on, or around the Emergency Response Course could drastically impact the safety of the Emergency Response Course. For example, officers' weight transfer in turns and tire traction of the vehicles could be impacted by alteration to the track or its surface. Furthermore, depending on what construction methods are utilized and what the geotechnical makeup of the ground is, even underground drilling could impact the grade and safety of the Emergency Response Course, as well. There are also concerns that without a casing or sleeve on the new Pipeline, the heat built up from cars and heavy vehicles repeatedly traversing the area over the pipeline could cause additional safety issues.

Given the precision in which the Emergency Response Course was built and inherent safety concerns in such a training center, any construction in the vicinity of the track brings countless unknown dangers. Attached as Exhibit 1 is a copy of correspondence submitted on behalf of the seventeen members of the NVCJTA, to further reflect the concerns raised by this Application and the wide impact such interference would have. This public comment is not meant to address every objection that NVCJTA has to the Pipeline, and NVCJTA reserves its right to address additional concerns as they come to light.¹

Request of NVCJTA

NVCJTA requests that VNG re-direct its proposed Pipeline to the west of the Emergency Response Course such that the training sessions could continue without interruption, therefore avoiding a delay in necessary training and graduation of police officers, as well as ensuring the safety of all personnel involved, including VNG staff working on the Pipeline. It also requests that the Pipeline be sufficiently re-directed such that the Emergency Response Course's asphalt and grade would not be affected from any land disturbances across or under the track.

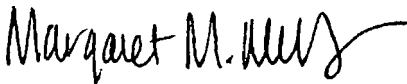
In the alternative, NVCJTA requests that its training schedule, which serves the list of the seventeen jurisdictions itemized above, be taken into consideration during the construction of the Pipeline in an effort to reduce the impact on the Emergency Response Course and training programs, as well as facilitate and protect the safety of the personnel working on the track and the safety of the communities that are served by the recruits that receive this necessary training.

NVCJTA has been in communications with VNG on some of these matters already and is hopeful that the parties will continue their efforts to try to reach an amicable resolution of NVCJTA's safety concerns. However, should NVCJTA or its Emergency Response Course be impacted at all by the construction of the Pipeline, then NVCJTA reserves its right to request that the Emergency Response Course be completely repaired and restored to ensure that high-speed driving may safely resume on the track and that any additional damages caused by the Pipeline to the property or to NVCJTA are fully repaired.

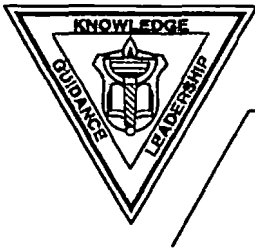
¹ For example, it also appears that the current projected path of the VNG pipeline may interfere with a conservation easement on NVCJTA's property. Any impact around the conservation easement could impact water drainage and flow on the property, increasing safety concerns, as well as environmental impact. This is yet another reason to shift the Pipeline as requested.

200420280

Respectfully Submitted,



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NORTHERN VIRGINIA CRIMINAL JUSTICE TRAINING ACADEMY

45299 Research Place • Ashburn, Virginia 20147-2600
(703) 729-4299 • Fax (703) 729-4634 • www.nvcja.org

April 14, 2020

State Corporation Commission
Public Utility Regulation
PO Box 1197
Richmond, VA 23218

Re: *Virginia Natural Gas, Inc.'s Notice to the Public of an Application for Approval and Certification of Natural Gas Facilities – Case No. PUR-2019-00207*

To Whom It May Concern:

The Northern Virginia Criminal Justice Training Academy (NVCJTA) owns and operates an Emergency Vehicle Operations Center (EVOC) at 13170 Public Safety Drive, Nokesville, Virginia 20181. The EVOC is utilized by the member agencies of the NVCJTA as well as the Prince William County Police Department to conduct emergency vehicle operations training.

On behalf of the NVCJTA Board of Directors, the members of the NVCJTA submit this letter in response to Virginia Natural Gas Inc.'s intention to build a new pipeline system improvement project that proposes to cross the EVOC property and directly impact the training track at the EVOC.

The following seventeen police and sheriffs' agencies utilize NVCJTA for training of recruits and personnel:

- Alexandria Police Department
- Alexandria Sheriff's Office
- Arlington County Police Department
- Arlington County Sheriff's Office
- City of Fairfax Police Department
- Falls Church City Police Department
- Falls Church Sheriff's Office
- George Mason University Police Department
- Leesburg Police Department
- Loudoun County Sheriff's Office
- Manassas City Police Department
- Manassas Park City Police Department
- Town of Middleburg Police Department

Ex. 1



- Northern Virginia Community College Police Department
- Purcellville Police Department
- Washington Metro Transit Police Department
- Metropolitan Washington Airports Authority Police

As reflected in the above list, the training provided by NVCJTA supports a number of jurisdictions in the region that must meet training requirements under state and federal law. Therefore, access to the track—and the safety of the personnel while training—is paramount.

This letter respectfully requests that the pipeline be redirected to the west of the track to avoid any impact to both the track itself and the training programs. The members respectfully request that NVCJTA's training schedule be taken into consideration during the construction of the redirected pipeline in an effort to reduce the impact on the track and training programs, as well as facilitate and protect the safety of the personnel working on and nearby the track, and ultimately, the safety of the communities that are served by the recruits that receive this necessary training.

The Academy has become aware of the use of horizontal directional drilling (HDD) for the installation of the pipeline on this property. While this technique seems promising and may allow drilling of the pipeline alignment from the adjacent property on one side, without having to do any excavation on the Academy property, the Academy remains concerned about any training interruption or impact to our track, that may occur and we ask that the alignment be redirected away from any improvements on the EVOC site. This request is fully supported by each agency that is a member of NVCJTA, as evidenced by the signatures below.

Sincerely,



Charles Yudd, Chair
Board of Directors
Northern Virginia Criminal Justice Training Academy

200420280

SIGNATURE PAGE ONE OF THREE

ALEXANDRIA POLICE DEPARTMENT

BY: [Signature] 4/15/2020

TITLE: Chief

ALEXANDRIA SHERIFF'S OFFICE

BY: [Signature]

TITLE: Sheriff

ARLINGTON COUNTY POLICE DEPARTMENT

BY: [Signature]

TITLE: CHIEF

ARLINGTON COUNTY SHERIFF'S OFFICE

BY: [Signature]

TITLE: Sheriff

CITY OF FAIRFAX POLICE DEPARTMENT

BY: [Signature]

TITLE: Chief of Police

FALLS CHURCH CITY POLICE DEPARTMENT

BY: [Signature]

TITLE: CHIEF OF POLICE
MARY GAVIN

SIGNATURE PAGE TWO OF THREE

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FALLS CHURCH SHERIFF'S OFFICE

BY: Maj. M. Cay for Sheriff S. Bittle

TITLE: Chief Deputy/Undersheriff

GEORGE MASON UNIVERSITY POLICE DEPARTMENT

BY: Carl Rowan Jr

TITLE: Chief of Police

LEESBURG POLICE DEPARTMENT

BY: Ray C. Brun

TITLE: CHIEF OF POLICE

LOUDOUN COUNTY SHERIFF'S OFFICE

BY: [Signature]

TITLE: Sheriff

MANASSAS CITY POLICE DEPARTMENT

BY: [Signature]

TITLE: Chief of Police

MANASSAS PARK CITY POLICE DEPARTMENT

BY: Mark King R

TITLE: Chief of Police

SIGNATURE PAGE THREE OF THREE

METROPOLITAN WASHINGTON AIRPORTS AUTHORITY POLICE

BY: Paul Huchler
TITLE: Chief of Police

TOWN OF MIDDLEBURG POLICE DEPARTMENT

BY: A.J. Panebianco AJ
TITLE: Chief of Police

NORTHERN VIRGINIA COMMUNITY COLLEGE POLICE DEPARTMENT

BY: Randy Russell
TITLE: Chief of Police

PURCELLVILLE POLICE DEPARTMENT

BY: C. A. Mason
TITLE: Chief of Police

WASHINGTON METRO TRANSIT POLICE DEPARTMENT

BY: Ronald Jr Pavlik E690370 WMATA
Digitally signed by Ronald Jr Pavlik E690370 WMATA
Date: 2020.04.06 13:04:36 -04'00'

TITLE: Chief of Police