



## Southern Shenandoah Valley Chapter

May 23, 2016

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

ACP Docket # **CP15-554-000**

Dear Ms. Bose:

The Potomac Appalachian Trail Club – Southern Shenandoah Valley Chapter, based in Harrisonburg, Staunton, and Waynesboro, VA, is concerned about the potential impact of the Atlantic Coast Pipeline on special natural resources in the George Washington National Forest (GWNF). The GWNF has been a primary recreation site for our club since it was formed in 1985. When we hike, we enjoy viewing wildflowers and native plants, butterflies, birds and other wildlife, the great variety of tree species in our area, special geologic features, and clean mountain streams.

We are writing with regard to the new alternate ACP route through parts of the GWNF in the vicinity of Fort Lewis and Scotchtown Draft in Bath County and the Deerfield Valley in Augusta County. We are submitting this letter as a supplement to our letter of April 12, 2016 to call particular attention to the close proximity of the route to three Central Appalachian Shale Barrens that are Special Biological Areas (SBAs) within the GWNF. According to the 2014 GWNF Management Plan, SBAs are core areas for conservation of the most significant and rarer elements of biological diversity identified to date on the Forest. These areas or communities are assemblages of plants and animals that occupy a small portion of the landscape, but contribute significantly to biological diversity. The Plan states that Special Biological Areas are unsuitable for designation of new utility corridors.



Reubens Draft Shale Barren on the GWNF  
Photo by Steven Johnson

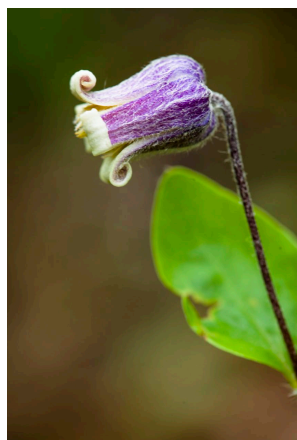
The following GWNF shale barrens lie within the study corridor for the new alternate ACP route:

1. **Ratcliff Hill SBA.** 31 acres. Located along the Cowpasture River on the east end of the Rt. 678 Bridge.
2. **Big Cedar SBA.** 43 acres. Near the intersection of Scotchtown Draft and Deerfield Rd.
3. **Reubens Draft Shale Barren SBA.** 39 acres - along Deerfield Rd. south of West Augusta.

Shale barrens are globally uncommon natural communities that host many rare species of plants and several rare butterflies. These isolated islands of habitat have steep southern exposures, dry, relatively sparse vegetative cover, high temperatures, and low moisture in the summer. One shale barren plant, the Shale barren rock-cress (*Boechea serotina*), is listed under the federal Endangered Species Act.

Five naturalists from the Shenandoah Valley, including two botanists from Washington & Lee University (Dr. John Knox and Mr. Charles Winder), local native plant expert Jay Shaner of Staunton, VA, and two signatories of this letter (Mike Smith and Malcolm Cameron) went on a field trip to the Reubens Draft and Ratcliff Hill Shale Barrens on May 10, 2016. The group observed the following shale barren plants at Reubens Draft:

- Shale barren rock-cress (*Boechea serotina*, formerly *Arabis serotina*) (federally endangered)
- Mountain nailwort (*Paronychia montana*)
- Kate's mountain clover (*Trifolium virginicum*). (in bloom)
- Shale barren clematis (*Clematis albicoma*) (in bloom)
- Rock spikemoss (*Bryodesma rupestre*)
- Shale barren evening-primrose (*Oenothera argillicola*)



Shale barren Clematis (*Clematis albicoma*). Photo by Brad Striebig; Rock spikemoss (*Bryodesma rupestre*) and Kate's Mountain clover (*Trifolium virginicum*). Photos by Steven David Johnson. All photos taken at Reubens Draft Shale Barren on May 18, 2016



Jay Shaner noted that Reubens Draft is the best shale barren in Augusta County and one of the best in our region in terms of plant diversity and number of occurrences.

The group also visited Ratcliff Hill Shale Barren and found the following plants along the bottom of the shale outcrops along the Cowpasture River:

- Shale barren bindweed (***Calystegia spithamea***)
- Shale barren clematis (***Clematis albicoma***) (in bloom)
- Shale barren wild buckwheat (***Eriogonum allenii***)

Shale barren rock-cress is present in the Ratcliff Hill Shale Barren, according to Charles Winder. It may also be present in the Big Cedar Shale Barren.



Shale barren rock cress (*Boechera serotina*) at Ratcliff Hill Shale Barren. Photo by Charles Winder.



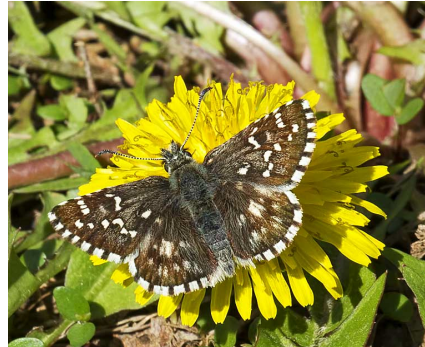
Ratcliff Hill Shale Barren along the Cowpasture River in Bath County. Photo by Lynn Cameron

The Shale barren rock-cress is one of only five federally endangered plant species on the GWNF, and it is found only in Appalachian Shale Barren communities. This plant is found in very stressed environments and cannot tolerate much disturbance. According to the U.S Fish & Wildlife Service, this plant's main threats include destruction of habitat by road construction or other human activities.

Most remaining occurrences of this rare plant are on GWNF land, and all known locations are allocated to management prescription 4D, Special Biological Area. The GWNF Land & Resource Management Plan calls for this unique plant to have the highest protection. Citing limited distribution and limited abundance of the Shale barren rock cress, the Plan aims to "maintain or increase populations/occurrences ... through protection and maintenance of existing sites." The state of Virginia lists the shale

barren rock-cress as “Critically imperiled”. The Endangered Species Act requires protective management and recovery.

The Shale barren rock-cress is **pollinated** by the Appalachian Grizzled Skipper (*Pyrgus wyandot*), a species of butterfly which is declining in numbers. The Grizzled skipper is found in only nine counties in Virginia and has been proposed for listing under the Endangered Species Act. Virginia Natural Heritage Program ranks it as G2/S1S2 (Critically imperiled).



Appalachian grizzled skipper.  
Photo by Matt Orsie

Construction and maintenance of the 42-inch gas transmission line would pose a high risk to the Shale barren rock-cress which occurs only in Virginia and West Virginia. The isolated islands of habitat for this federally endangered plant could be obliterated or badly damaged by construction, and populations would be reduced. No matter where the pipeline would be constructed within the study corridor for the alternate route, this plant and other members of the Shale barren natural community would be well within the radius of potential impact if an explosion should occur. It is not possible to build the ACP through the Fort Lewis, Scotchtown Draft, and Deerfield Valley area where these Appalachian shale barrens are located without putting these special plants and their natural communities at risk. Please deny Dominion Resources a permit to build the ACP on the alternate route through the Fort Lewis-Scotchtown Draft-Deerfield Valley area.

Thank you for the opportunity to comment on the alternate ACP route.

Sincerely,

Lynn Cameron  
Malcolm Cameron  
Mike Smith  
Conservation Committee  
Potomac Appalachian Trail Club – Southern Shenandoah Valley Chapter  
5653 Beards Ford Rd.  
Mt. Crawford, VA 22841  
[www.ssvc.org](http://www.ssvc.org)  
(540)234-6273  
[slynnccameron@gmail.com](mailto:slynnccameron@gmail.com)