

January 12, 2014

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

Re: Docket Number PF 15-6

Dear Secretary Bose:

The Virginia Native Plant Society (VNPS) is pleased to provide comments on the proposed Atlantic Coast Pipeline. VNPS is a non-profit organization with more than 2,000 members throughout Virginia. The society is dedicated to the conservation of Virginia's native plants and habitats so that current and future generations will be able to appreciate the Commonwealth's rich natural heritage of ecosystems and biodiversity. As our mission statement concludes, "We are committed to do all we can to slow the accelerating conversion of natural landscape to built and planted landscape and to reduce its damage to natural ecosystems."¹ In the context of our mission statement, in October 2014, our Board of Directors overwhelmingly voted to oppose construction of the Atlantic Coast Pipeline (ACP).

In preparing these comments, VNPS reviewed the attached November 18, 2014, letter from Tom Smith, Director of the Division of Natural Heritage (DNH) within the Virginia Department of Conservation and Recreation (DCR), to Pamela Faggert, Vice President and Chief Environmental Officer of Dominion Resources Services, Inc. The letter states that the pipeline corridor, including the two-mile buffer on each side of the centerline, will intersect five DCR dedicated Natural Area Preserves and 72 Natural Heritage Conservation Sites and Stream Conservation Units. The Natural Area Preserves system was established in 1989 to protect the most significant natural areas in Virginia encompassing some of the rarest natural communities and rarest species in the state. Conservation sites are identified areas of the natural landscape that support important habitat and natural resources that warrant further review for conservation action. They are polygons built around one or more rare plant or animal species, or natural communities, to include a sufficient buffer to protect that species element. Stream Conservation Units are areas that contain aquatic natural heritage resources and include a buffer two miles upstream and a mile downstream of documented occurrences.

Within the 72 Natural Heritage Conservation Sites, 18 will be intersected by the pipeline's centerline. These are shown on maps on a table attached to the November 18, 2014, DCR letter to Dominion Resources, Inc.

One example of the kind of habitat that is threatened by the ACP is the shale barrens of Virginia's western counties, including Highland and Augusta counties. These extremely sensitive natural communities feature a number of endemic species found only in those habitats. The recently published *Flora of Virginia* notes that, "Shale barrens (Platt 1951; Braunschweig et

¹ The Virginia Native Plant Society website: www.vnps.org

al. 1999; Figure 11) are probably the best known Central Appalachian outcrop, or barren, community, being essentially endemic to the Ridge and Valley from south-central Pennsylvania through western Maryland and northeastern West Virginia to Craig and Montgomery counties in Virginia.”² Notes for Figure 11 on the preceding page of the Flora state, “*The world’s largest concentration of shale-barren vegetation occurs in the west-central Ridge and Valley counties of Virginia.*”³ Placing a 42-inch pipeline, requiring a 125-foot construction right of way followed by a 75-foot permanent right of way through such an ecologically sensitive area would severely disrupt those communities and is strongly opposed by the VNPS.

In addition to the severe disruption of these priceless natural resources, the ACP’s four mile wide study corridor also intersects 38,115 acres of wetlands identified in DCR’s 2014 Virginia Wetlands Catalog. The catalogue was developed as a tool for, “...prioritizing and ranking the conservation and restoration values of known and predicted wetlands throughout Virginia.”⁴

The letter also notes the concern about forest habitat fragmentation and notes the ACP as proposed could harm as much as 45,852 acres of forest ranked as, “C1, Outstanding Ecological Integrity,” and, 132,229 acres of, “C2, Very High Ecological Integrity.” VNPS members spend many hours every year working to control the increasing occurrence of invasive plant species in natural areas. It is very evident to us that cutting through undisturbed forest land to construct a pipeline, will provide a virtual highway for invasive species like *Ailanthus altissima* (Paradise tree) and *Microstegium vimineum* (Japanese stiltgrass). These species can outcompete native species creating monocultures of invasive species where rich, native species used to thrive. The impact of invasive plant species is a serious threat to Virginia’s native plants and every effort to avoid opportunity for their spread should be made.

The VNPS also notes that ACP crosses over Shenandoah Mountain within the George Washington National Forest. Shenandoah Mountain was just designated a National Scenic Area by the U.S. Forest Service. According to the Friends of Shenandoah Mountain, the proposed route would:

- “Cross Ramsey’s Draft stream outside the wilderness area
- Cross Braley pond access road
- Obliterate the Dowell’s Draft forest road
- Pass through the Chestnut Oak Ruffed Grouse Habitat Project and
- Pass very close to the east end of the Staunton Dam tunnel through Hankey Mountain, potentially threatening Staunton’s municipal water supply”⁵

VNPS appreciates this opportunity to comment on the Atlantic Coast Pipeline project. The society finds the project potentially very destructive to a sizable portion of the priceless natural

² Gary P. Fleming. 2012. Nature of Virginia Flora. P. 43 in A.S. Weakley, J.C. Ludwig and J.F. Townsend (authors); B. Crowder (ed). *Flora of Virginia*. Fort Worth: BRIT Press.

³ Ibid., p. 42.

⁴ See p. 2, letter from Tom Smith, Director of Division of Natural Heritage, DCR to Pamela Faggert, Vice President and Chief Environmental Officer, Dominion Resources, Inc.

⁵ Friends of Shenandoah Mountain: www.friendsofshenandoahmountain.org

resources of Virginia, including habitats that are unique in the world. For all of these reasons, the VNPS urges you to strongly consider rejection of the project.

Sincerely,

A handwritten signature in black ink that reads "Nancy Vehrs". The signature is written in a cursive, flowing style.

Nancy Vehrs
President

Cc: Senator Mark Warner
Senator Tim Kaine