



VIRGINIA NATIVE PLANT SOCIETY

Conserving Wild Flowers and Wild Places

May 27, 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 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 our letter to you in January of 2015, VNPS raised grave concerns about the damage that the ACP proposed route at that time would pose for the shale barrens of Virginia's Western counties: "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 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."

The Society is writing at this time with specific regard to the new alternate route for the ACP through parts of the GWNF in the vicinity of Fort Lewis, Scotchtown Draft, and the Deerfield Valley. We would like to call

¹ VNPS website: www.vnps.org

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.

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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 these areas are unsuitable for designation of new utility corridors,

Three 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 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.

Members of the Virginia Native Plant Society who live near these sites, enjoy visiting them and have documented the extremely rare species that exist there have written to you urging denial of a permit for pipeline construction on the alternate route. That letter is attached and is included as part of the Society's comment submission. The Society wholeheartedly agrees that it is not possible to build the ACP through the Fort Lewis, Scotchtown Draft, and Deerfield Valley area where these special Appalachian shale barrens are located without putting these special plants, their associated pollinators 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.

Sincerely,



Nancy Vehrs
President

