



# VIRGINIA NATIVE PLANT SOCIETY

Conserving Wild Flowers and Wild Places

April 28, 2015

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426  
Re: Docket No. P15-6-000

Dear Secretary Bose:

The Virginia Native Plant Society (VNPS) is pleased to provide scoping comments for the Environmental Impact Statement on the proposed Atlantic Coast Pipeline (ACP). 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."<sup>1</sup> 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 memorandum to FERC from the Virginia Department of Conservation and Recreation (DCR) dated April 27, 2015. The memorandum states that the pipeline centerline and/or the half-mile corridor study area on each side of the centerline, will intersect 37 identified conservation sites, including six rated B1, containing examples of natural communities and rare species of outstanding significance, and nine rated as B2, containing habitat and species of very high significance. In addition to the severe disruption of these priceless natural resources, the ACP's mile wide study corridor also intersects 257 karst features (sinkholes) and fragments 10,241 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. Finally, the study corridor also fragments 12,664 acres of forest ranked by the Natural Landscape Assessment as C1, exhibiting, "Outstanding Ecological Integrity" and 35,388 acres of forest ranked as C2, exhibiting "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 wetlands and 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 out-compete 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. VNPS endorses DCR's statement in their EIS scoping memorandum,

"Maintenance of pipeline right-of-ways during and after construction will be critical for the conservation of natural heritage resources. DCR would like to work with Dominion to determine best management practices for right-of-way maintenance for the proposed pipeline including management of invasive species."

The VNPS appreciates this opportunity to provide scoping comments to FERC for its Environmental Impact Statement for the Atlantic Coast Pipeline project. The Society finds the project potentially very destructive to a sizable portion of the priceless natural resources of the state of Virginia. For all of these reasons, the VNPS urges you to strongly

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<sup>1</sup> VNPS website: [www.vnps.org](http://www.vnps.org)

consider rejection of the project.

Sincerely yours,

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

Nancy Vehrs  
President, VNPS

Cc: Senator Mark Warner  
Senator Tim Kaine