

Molly Joseph Ward  
Secretary of Natural Resources

Clyde E. Cristman  
Director



Joe Elton  
Deputy Director of Operations

Rochelle Altholz  
Deputy Director of Administration  
and Finance

**COMMONWEALTH of VIRGINIA**  
**DEPARTMENT OF CONSERVATION AND RECREATION**

600 East Main Street, 24<sup>th</sup> Floor  
Richmond, Virginia 23219  
(804)786-6124

June 4, 2015

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

Re: Additional Natural Heritage Information – Atlantic Coast Pipeline (Docket PF15-6-000)

Dear Ms. Bose:

The Virginia Department of Conservation and Recreation (DCR) provided comments on the Atlantic Coast Pipeline Project (Docket PF15-6-000) to FERC on April 27, 2015. These comments included information about natural heritage resources which are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations tracked by the DCR-Division of Natural Heritage (DCR-DNH).

Since the submittal of the DCR comments in April, DCR-DNH biologists have identified a significant natural community, a Central Appalachian Low-Elevation Acidic Seepage Swamp (G2/S2/NL/NL) intersecting the proposed pipeline route (see attached map).

This community occurs on groundwater-saturated flats and low slopes along streams in the Ridge and Valley, northern Cumberland Plateau, Northern Blue Ridge, and western Piedmont at elevations of 200-900 m (700-2900 feet). Habitats are usually more-or-less narrow and elongate, with hummock-and-hollow microtopography, and frequently with a small ephemeral stream channel running through or adjacent to the community. Substrates are poorly drained mineral soils with numerous hydric indicators. The ground surface is slightly sloping, and drainage is usually via small, intricately braided channels with interspersed hummocks.

The canopy is usually closed and consists of Red maple (*Acer rubrum*), Black gum (*Nyssa sylvatica*), and Tulip-poplar (*Liriodendron tulipifera*). White oak (*Quercus alba*) is an important associate in some areas, and Slippery elm (*Ulmus rubra*), White ash (*Fraxinus Americana*), and Sycamore (*Platanus occidentalis*) are present in some stands (NatureServe, 2015).

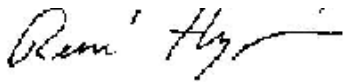
A conservation site has been created for this significant community and named the Beaver Creek Headwaters Conservation Site. Conservation sites are polygons built around one or more rare plant, animal, or natural community designed to include the element and, where possible, its associated habitat, and buffer or other adjacent land thought necessary for the element's conservation. Conservation sites are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain; on a scale of 1-

5, 1 being most significant. Beaver Creek Headwaters Conservation Site has been given a biodiversity significance ranking of B2, which represents a site of very high significance.

The proposed Atlantic Coast Pipeline route (East of Lovington Alternative) directly bisects the Beaver Creek Headwaters Conservation Site. An aggressive and invasive plant species, Joint Head Grass (*Asthraxon hispidus*), is common in some of the forest near the conservation site. The opening of tree canopy and the ground disturbance associated with a pipeline project could potentially act as a vector for the introduction of this or other invasive species. Therefore, DCR recommends avoidance of the Beaver Creek Headwaters Conservation Site and associated significant community.

Should you have any questions or concerns, feel free to contact me at 804-371-2708.

Sincerely,

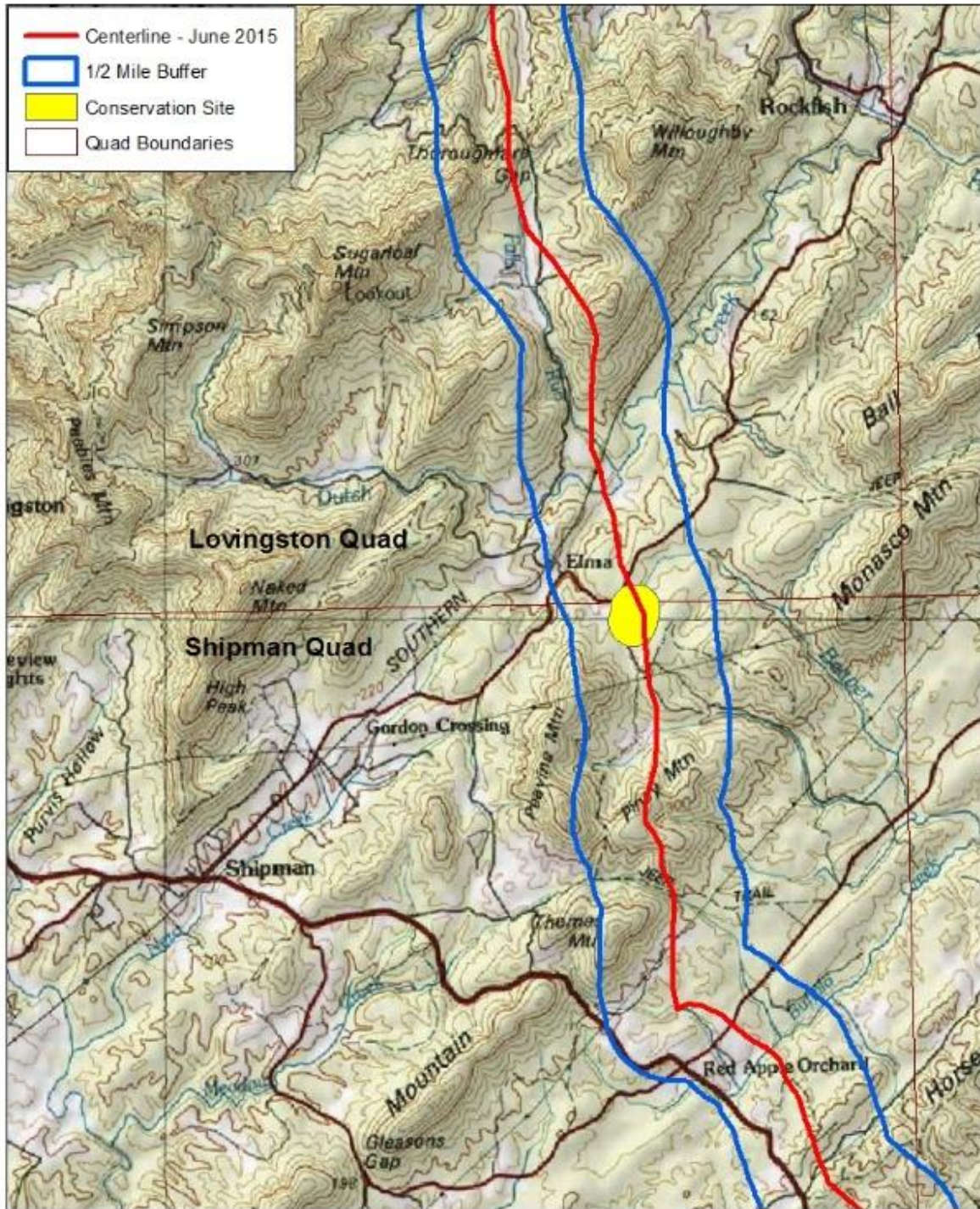
A handwritten signature in black ink, appearing to read "S. Rene' Hypes". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

S. Rene' Hypes  
Project Review Coordinator

CC: Robbie Rhur, DCR-DPRR

#### Literature Cited

NatureServe. 2015. NatureServe Explorer: An online encyclopedia of life [web application]. Version 7.1. NatureServe, Arlington, Virginia. Available <http://explorer.natureserve.org>. (Accessed: June 4, 2015).



**Dominion - Atlantic Coast Pipeline**  
**Beaver Creek Headwaters Conservation Site**  
**Nelson County**



Date: 6/4/2015

