



VIRGINIA NATIVE PLANT SOCIETY

Conserving Wild Flowers and Wild Places

H. Thomas Speaks, Jr., Forest Supervisor
George Washington and Jefferson National Forests
5162 Valleypointe Parkway
Roanoke, Virginia 24019

DATE: February 13, 2015

REFERENCE: Mountain Valley Pipeline

SUBJECT: Comments on the Application for a Special Use Authorization for
Survey Activities for the Proposed Mountain Valley Pipeline Corridor through the
Jefferson National Forest

The Virginia Native Plant Society (VNPS) is pleased to provide comments to the U.S. Forest Service on the proposed Mountain Valley 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 These comments are submitted in the context of the Society's mission statement.

The George Washington and Jefferson National Forests together comprise the largest intact forest in the Eastern United States. It is an important natural resource for Virginia, providing clean water to major downstream cities, recreational resources, and habitat that supports impressive biodiversity. VNPS members spend many hours every year working to control the increasing occurrence of invasive plant species in Virginia's natural areas. It is very evident to us that clear-cutting a 125-foot swath 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 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.

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

The VNPS also notes that DCR has determined the proposed MVP corridor through the forest in Giles County is in the vicinity of two DCR- Natural Heritage identified conservation sites: Foster Knob and Laurel Branch Slopes. These sites have a biodiversity significance of B2, or very high significance. In particular, they contain habitat supporting a rare orchid, *Corallorhiza bentleyi*, or Bentley's coralroot. On a scale of 1-5, with 1 being the most rare, this plant has a global rating of G1/G2 and a state rating of S1. The VNPS supports DCR's recommendations in the attached letter² regarding this part of the pipeline's crossing of the U.S. Forest Service as well as its concerns about the second crossing in Montgomery County which will impact a rare mussel species, James spinymussel (*Pleurobema collina*, with a global rating of G1 and a state rating of S1.

It is critical that the inventory conducted by Mountain Valley Pipeline companies through the Jefferson National Forest be conducted by personnel with appropriate credentials and experience to conduct the environmental survey. The GWNF is a public resource paid for by the citizens of the United States. We are owed, at the very least, a survey that is appropriately conducted by personnel with adequate background and in conjunction with federal and state agencies with jurisdiction over rare species and supporting habitats of concern.

VNPS appreciates this opportunity to comment on the Mountain Valley Pipeline project. The society finds the project potentially very destructive to a portion of the priceless natural resources of Virginia. For this reason, the VNPS urges you to strongly consider rejection of the project.

Sincerely,



Nancy Vehrs
President

Cc: Senator Mark Warner
Senator Tim Kaine

² Virginia Department of Conservation and Recreation, Mountain Valley Pipeline Survey Comments—Special Use Permit, to the USDA Forest Service, February 12, 2015.