

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

DATE: January 23, 2015

REFERENCE: Atlantic Coast Pipeline

SUBJECT: Comments on the Application for a Special Use Authorization for Survey Activities, submitted by Dominion Transmission, Inc., for the Proposed Atlantic Coast Pipeline Corridor through the George Washington National Forest

The Virginia Native Plant Society (VNPS) is pleased to provide comments to the U.S. Forest Service 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 the society's mission statement, in October, 2014, the Board of Directors overwhelmingly voted to oppose construction of the Atlantic Coast Pipeline (ACP).

The George Washington and Jefferson National Forest is 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 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

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

- 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"²

In addition to these factors, it is of great concern to VNPS that Dominion Transmission Inc.'s application to the Forest Service to conduct the environmental survey fails to list the credentials and experience of the personnel who will do the work. 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.

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 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 Friends of Shenandoah Mountain: www.friendsofshenandoahmountain.org