



April 28, 2015

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

Re: Atlantic Coast Pipeline, FERC Docket # PF15-6

Dear Secretary Bose:

Friends of Shenandoah Mountain submitted comments on the Atlantic Coast Pipeline on Nov. 13, 2014 (See attached FOSM Letter to FERC). We are submitting additional comments further expanding our points on potential impacts to the Cow Knob Salamander.

The Cow Knob Salamander (*Plethodon punctatus*) is a woodland salamander found primarily on Shenandoah Mountain in Virginia and West Virginia between 2,400 and 4,300 feet in elevation. The Cow Knob salamander is listed as:

- a "Species At Risk" by the U.S. Fish and Wildlife Service;
- a "Species of Special Concern" in Virginia and West Virginia;
- "Near Threatened" on International Union for Conservation of Nature's Redlist.

Nearly the entire range of the Cow Knob Salamander lies within the George Washington National Forest (GWNF). These endemic salamanders are a source of regional pride and are a part of some of the most amazing biodiversity found anywhere. This species is terrestrial and is usually found living in rocky outcrops that occur in moist areas. It is threatened by logging, roadbuilding, forest fragmentation, and deforestation.

In 1994, the U.S. Fish and Wildlife Service and the GWNF entered into a Conservation Agreement to keep this at-risk species from needing to be listed under the Endangered Species Act. This Conservation Agreement established the Shenandoah Mountain Crest Conservation Area with written guidelines that protect habitat for the Cow Knob Salamander along with 28 other at risk species of plants and animals. (See Conservation Agreement, 1994) According to the 2014 GWNF forest management plan, the Conservation Area is unsuitable for designation of new utility corridors unless there is an over-riding demonstrated public need or benefit. No new roads may be constructed in Cow Knob Salamander habitat. The GWNF plan

also states that if Cow Knob salamanders are found in areas outside the boundaries of the Shenandoah Mountain Crest Management Area, those areas will be subject to the same management measures. (See attachment: Excerpts from 2014 GWNF Plan, with significant text highlighted) The management objectives stated in the plan are in keeping with the guidelines established by the 1994 Conservation Agreement.

The proposed Atlantic Coast Pipeline passes through Cow Knob Salamander habitat about 10 miles south of the Shenandoah Mountain Crest Conservation Area. Numerous occurrences of Cow Knob Salamander were documented on Shenandoah Mountain south of Rt. 250 in 2008, by Dr. Reid Harris, Professor of Biology, James Madison University. These occurrences, shown on the attached maps are in close proximity to the proposed pipeline. (See attached Harris letter to Fish & Wildlife and three accompanying maps)

Eastern Mennonite University students photographed Cow Knob Salamanders in the Signal Corps Knob area of Shenandoah Mountain, within the vicinity of the pipeline route in October 2014, providing evidence that healthy populations are present. See photos at:

<https://www.flickr.com/photos/stevendavidjohnson/galleries/72157649390492841/>

If built, the Atlantic Coast Pipeline would bisect an area with known populations of Cow Knob Salamander, creating an uncrossable barrier that would isolate populations and cut off genetic exchange. Habitat fragmentation and deforestation from construction and maintenance of a permanent pipeline corridor would further endanger this sensitive species, found nowhere else on earth.

Dominion Resources has not offered a single alternative route that avoids known Cow Knob Salamander habitat on Shenandoah Mountain. The proposed route over Shenandoah Mountain violates the Conservation Agreement and the GWNF Management Plan. We think it would be very hard to make the case that a high impact utility corridor of this size and magnitude could only be built through this sensitive habitat. It is clear to us that the Conservation Agreement obligates both the Forest Service and U.S. Fish and Wildlife Service to employ strong protection measures to ensure the survival of the Cow Knob Salamander.

If the Conservation Agreement does not effectively achieve the goal of securing and protecting the Cow Knob Salamander within its known and potential range from the logging, roadbuilding, forest fragmentation and deforestation related to construction and maintenance of the ACP, then it seems likely that interested parties will pursue federal listing under the Endangered Species Act.

We request that FERC deny Dominion Resources application or insist they develop an alternative route that does not

- fragment Cow Knob Salamander habitat and
- degrade scenic, recreational, and water resources on Shenandoah Mountain.

We see no justification for a new corridor through special habitat and would prefer to see Dominion use existing rights-of-way, if the pipeline is deemed necessary.

Thank you for the opportunity to comment.

Sincerely,

Lynn Cameron
Co-Chair
Friends of Shenandoah Mountain
5653 Beards Ford Rd.
Mt. Crawford, VA 22841
slynncameron@gmail.com
(540)234-6273

Attachments:

FOSM letter to FERC, Nov. 13, 2014

Conservation Agreement, 1994

Excerpts from 2014 GWNF Plan

Harris letter to U.S. Fish and Wildlife Service, April 18, 2015

- Map: CKS on Shenandoah Mountain south of Rt. 250
- Map: CKS on Elliott Knob and Crawford Mountain
- Map: ACP in relation to CKS occurrences