

Stefanie K. Taillon  
Secretary of Natural and Historic Resources

Matthew S. Wells  
Director

Andrew W. Smith  
Chief Deputy Director



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

Frank N. Stovall  
Deputy Director  
for Operations

Darryl Glover  
Deputy Director for  
Dam Safety,  
Floodplain Management and  
Soil and Water Conservation

Laura Ellis  
Deputy Director for  
Administration and Finance

October 23, 2025

Shawn Crist  
DEQ-BRRO  
3019 Peters Creek Rd  
Roanoke, VA 24019

Re: WP4-25-2174, PointOne Richmond Campus

Dear Mr. Crist:

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

According to a DCR biologist and predictive suitable habitat modeling, there is potential for New Jersey rush (*Juncus caesariensis*, G2G3/S2/SOC/LT) to occur in the project area if suitable habitat exists on site. New Jersey rush, a sedge-like herb with a rough surface and narrow leaves, inhabits acidic hardwood swamps, seeps, swales or pond margins. These sites usually contain a persistent seepage of groundwater or perennially reliable flow (Ware, 1991). It has also been documented in seepages within such disturbed areas as powerline rights-of-way. New Jersey rush is restricted to isolated occurrences in the coastal plain of Virginia (TNC et. al., 1999). Threats to this plant include disruptions in its hydrological regime, such as draining or filling wetlands and flooding by beavers, invasions by competitors resulting from clear-cutting of the overstory (Ware, 1991) and succession of its habitat to woody vegetation (Nature Serve 2011). Surveys for New Jersey rush should be conducted during the fruiting period of this plant from August – October.

Please note that this species is listed as threatened by the Virginia Department of Agriculture and Consumer Services (VDACS). It is also classified as a species of concern by the United States Fish and Wildlife Service (USFWS); however, this designation has no official legal status.

Due to the potential for this site to support populations of New Jersey, DCR recommends an inventory for the resource in the powerline right of way within the project area. With the survey results we can more accurately evaluate potential impacts to natural heritage resources and offer specific protection recommendations for minimizing impacts to the documented resources.

DCR-Division of Natural Heritage biologists are qualified to conduct inventories for rare, threatened, and endangered species. Please contact Anne Chazal, Natural Heritage Chief Biologist, at [anne.chazal@dcr.virginia.gov](mailto:anne.chazal@dcr.virginia.gov) or 804-786-9014 to discuss availability and rates for field work..

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

**State Parks • Soil and Water Conservation • Planning and Recreation Resources  
Natural Heritage • Dam Safety and Floodplain Management • Land Conservation**

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. Survey results should be coordinated with DCR-DNH. Upon review of the results, if it is determined the species is present, and there is a likelihood of a negative impact on the species, DCR-DNH will recommend coordination with VDACS to ensure compliance with Virginia's Endangered Plant and Insect Species Act.

In addition, the proposed project will impact an Ecological Core (C3) as identified in the Virginia Natural Landscape Assessment (<https://www.dcr.virginia.gov/natural-heritage/vaconvisvnl>). Mapped cores in the project area can be viewed via the Virginia Natural Heritage Data Explorer, available here: <http://vanhde.org/content/map>.

Ecological Cores are areas of at least 100 acres of continuous interior, natural cover that provide habitat for a wide range of species, from interior-dependent forest species to habitat generalists, as well as species that utilize marsh, dune, and beach habitats. Interior core areas begin 100 meters inside core edges and continue to the deepest parts of cores. Cores also provide the natural, economic, and quality of life benefits of open space, recreation, thermal moderation, water quality (including drinking water recharge and protection, and erosion prevention), and air quality (including sequestration of carbon, absorption of gaseous pollutants, and production of oxygen). Cores are ranked from C1 to C5 (C5 being the least significant) using nine prioritization criteria, including the habitats of natural heritage resources they contain.

Impacts to cores occur when their natural cover is partially or completely converted permanently to developed land uses. Habitat conversion to development causes reductions in ecosystem processes, native biodiversity, and habitat quality due to habitat loss; less viable plant and animal populations; increased predation; and increased introduction and establishment of invasive species.

DCR recommends avoidance of impacts to cores. When avoidance cannot be achieved, DCR recommends minimizing the area of impacts overall and concentrating the impacted area at the edges of cores, so that the most interior remains intact.

There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

New and updated information is continually added to Biotics. Please re-submit project information and map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

The Virginia Department of Wildlife Resources (VDWR) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed at <https://services.dwr.virginia.gov/fwis/> or contact Susan Watson at [Susan.Watson@dwr.virginia.gov](mailto:Susan.Watson@dwr.virginia.gov).

Should you have any questions or concerns, please contact me at 804-225-2821. Thank you for the opportunity to comment on this project.

Sincerely,

*Barbara Gregory*

Barbara Gregory  
Project Review Assistant, Senior

## Literature Cited

NatureServe. 2011. NatureServe Explorer: An online encyclopedia of life [web application]. Version 7.1. NatureServe, Arlington, Virginia. Available <http://www.natureserve.org/explorer>. (Accessed: July 25, 2011 ).

Ware, D.M.E. 1991. New Jersey rush. In Virginia's Endangered Species: Proceedings of a Symposium. K. Terwilliger ed. The McDonald and Woodward Publishing Company, Blacksburg, Virginia.