Matthew J. Strickler Secretary of Natural Resources

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Russell W. Baxter Deputy Director of Dam Safety & Floodplain Management and Soil & Water Conservation

Thomas L. Smith Deputy Director of Operations

January 3, 2020

Ken Arney Acting USFS Regional Forester c/o Jessie Howard 5162 Valleypointe Parkway Roanoke, VA 24019

Re: 2020 Slow the Spread (STS) Treatments Scoping

Dear Mr. Arney:

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 submitted ArcGIS shapefiles. 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.

Terrestrial and Aquatic Natural Heritage Resources

Hutchinson Rock and Cedar Spring 1 Treatment Blocks

According to the information currently in our files, natural heritage resources have not been documented within 100 feet of the project boundaries. The absence of data may indicate that the project area has not been surveyed, rather than confirm that the area lacks natural heritage resources.

Speedwell, Chatham Hill and Cedar Spring 2 Treatment Blocks

Biotics documents the presence of natural heritage resources within 100 feet of the project area. However, due the use of mating disruption treatment to treat gypsy moth infestations, we do not anticipate that this project will adversely impact these natural heritage resources.

Karst Resources

Chatham Hill Treatment Block

The Virginia DCR Karst staff screened these treatment areas against the Virginia Speleological Survey (VSS) database and the Virginia DMME sinkhole coverage for documented sensitive Karst features and caves. No significant negative impact is expected to the karst or cave resources from the aerial pesticide treatment of sites with gypsy moth pheromone specific mating tactics (SPLAT-GM-O).

If karst features such as sinkholes, caves, disappearing streams, and large springs are encountered during the project, please coordinate with Wil Orndorff (540-230-5960, Wil.Orndorff@dcr.virginia.gov) to

document and minimize adverse impacts. Discharge of runoff to sinkholes or sinking streams, filling of sinkholes, and alteration of cave entrances can lead to surface collapse, flooding, erosion and sedimentation, groundwater contamination, and degradation of subterranean habitat for natural heritage resources. If the project involves filling or "improvement" of sinkholes or cave openings, DCR would like detailed location information and copies of the design specifications. In cases where sinkhole improvement is for storm water discharge, copies of VDOT Form EQ-120 will suffice.

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

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 statelisted threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

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 Game and Inland Fisheries (VDGIF) 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 from http://vafwis.org/fwis/ or contact Ernie Aschenbach at 804-367-2733 or Ernie.Aschenbach@dgif.virginia.gov. There is potential for the little brown bat (*Myotis lucifugus*) and /or the tri-colored bat (*Perimyotis subflavus*) within some of the treatment blocks. According to the information currently in our files, the Unnamed Tributary to Greasy Creek intersecting the Amonate_1 and Amonate 201910171527 treatment blocks has been designated by VDGIF as a "Threatened and Endangered Water" for state and federally listed freshwater mussels. In addition, Lick Creek intersecting the Chatham Hill and Hutchinson Rock treatments block has been designated by VDGIF as a "Threatened and Endangered Water" for the state listed Tennessee dace. Therefore, DCR recommends coordination with USFWS and VDGIF, Virginia's regulatory authority for the management and protection of these species to ensure compliance with protected species legislation.

Should you have any questions or concerns, feel free to contact me at 804-371-2708. Thank you for the opportunity to comment on this project.

Sincerely,

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Natural Heritage Project Review Coordinator

CC: Ernie Aschenbach, VDGIF Troy Andersen, USFWS Wil Orndorff, DCR-Karst

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