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

March 29, 2021

Eric Freels  
Acting District Ranger  
Glenwood/Pedlar Ranger Districts  
27 Ranger Lane  
Natural Bridge Station, VA, 24579

Re: Bobblets Gap Project Draft EA

Dear Mr. Freels:

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.

DCR reiterates the following previous comments as provided for the scoping notice for this project on November 2, 2020.

**Timber Harvest – Unit 6 and Prescribed Fire**

**Terrestrial and Aquatic Resources**

Biotics documents the presence of natural heritage resources within the project boundary including a 100ft buffer. However, due to the scope of the activity we do not anticipate that this project will adversely impact these natural heritage resources. In addition, the project boundary does not intersect any of the predictive models identifying potential habitat for natural heritage resources.

**Karst**

Please note, this project area does intersect the karst bedrock screening layer. Encountering undocumented caves, sinkholes or other sensitive karst features in this area is possible. During every phase of the project, DCR recommends stabilization of the soil around the site. Minimizing surface disturbance, strict use of E&S control measures appropriate for the location and adherence to best management practices appropriate for karst will help to reduce any potential impact to the karst, groundwater and surface water resources as well as any associated fauna and flora.

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](mailto:Wil.Orndorff@dcr.virginia.gov)) the Virginia DCR, Division of Natural Heritage Karst Protection Coordinator, to document and minimize adverse impacts. Activities such as discharge of runoff to sinkholes or sinking streams, filling of sinkholes, and alteration of cave entrances can lead to environmental impacts including surface collapse, flooding, erosion and sedimentation, contamination of groundwater and springs, and degradation of subterranean habitat for natural heritage resources (e.g. cave adapted invertebrates, bats). These potential impacts are not necessarily limited to the immediate project area, as karst systems can transport water and associated contaminants rapidly over relatively long distances, depending on the nature of the local karst system. 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.

### **Timber Harvests- All Other Stands and Bobblets Gap A.T. Relocation**

According to the information currently in our files, natural heritage resources have not been documented within the project boundaries including a 100ft buffer. The absence of data may indicate that the project areas have not been surveyed, rather than confirm that the areas lack natural heritage resources. In addition, the project boundaries do not intersect any of the predictive models identifying potential habitat for natural heritage resources.

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. The current activities will not affect any documented state-listed plants or insects.

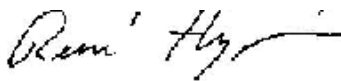
There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

New and updated information is continually added to Biotics. Please re-submit a completed order form and project 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 from <http://vafwis.org/fwis/> or contact Ernie Aschenbach at 804-367-2733 or [Ernie.Aschenbach@dwr.virginia.gov](mailto:Ernie.Aschenbach@dwr.virginia.gov).

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,



S. René Hypes  
Natural Heritage Project Review Coordinator

Cc: Wil Orndorff, DCR-Karst