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

February 22, 2022

Joby P. Timm  
Forest Supervisor  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Re: Forestwide Fiberoptic Telecommunication Line Project

Dear Mr. Timm:

The Department of Conservation and Recreation's Division of Natural Heritage's (DCR) mission is conserving Virginia's biodiversity through inventory, protection, and stewardship. 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 has reviewed the proposed programmatic environmental assessment (EA) and decision notice to issue special use permits to proponents requesting to locate fiberoptic telecommunications lines across National Forest Service (NFS) lands on the George Washington Jefferson National Forest. DCR offers the following comments:

- Numerous natural heritage resources are documented within the NFS lands in Virginia. DCR recommends avoiding impacts to these natural heritage resources through environmental screening of these projects by DCR to identify potential conflicts with natural heritage resources as stated in the potential resource protection measures section on page 3.
- Portions of the national forest service land are situated on karst-forming carbonate rock and can be characterized by sinkholes, caves, disappearing streams, and large springs. Encountering sensitive karst features in these areas is possible. DCR recommends these projects be screened by this office to determine if karst features are located within the proposed project area to document and minimize adverse impacts.
- If undocumented 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

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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.

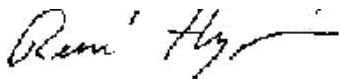
- For federally and state listed species, DCR recommends coordination with the United Fish and Wildlife Services (USFWS) and the Virginia Department of Wildlife Resources (VDWR) to ensure compliance with protected species legislation.
- DCR recommends a geology analysis to determine the appropriateness of Horizontal Directional Drilling (HDD) crossing methods for sensitive areas and the development of an emergency spill plan for potential frac-outs. DCR does not recommend the use of directional drilling for stream crossings in karst areas, where loss of drilling fluid into voids can damage habitat and contaminate ground and surface water.
- DCR recommends the development and implementation of an invasive species plan to be included as part of the maintenance practices for the right-of-way (ROW). The invasive species plan should include an invasive species inventory for the project area based on the current DCR Invasive Species List (<http://www.dcr.virginia.gov/natural-heritage/document/nh-invasive-plant-list-2014.pdf>) and methods for treating the invasives. DCR also recommends the ROW restoration and maintenance practices planned include appropriate revegetation using native species in a mix of grasses and forbs, robust monitoring and an adaptive management plan to provide guidance if initial revegetation efforts are unsuccessful or if invasive species outbreaks occur.
- New and updated information is continually added to Biotics. DCR recommends re-submitting the 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 a special use permit is issued.

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 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 Amy Martin at 804-367-2211 or [amy.martin@dwr.virginia.gov](mailto:amy.martin@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 programmatic decision.

Sincerely,



S. Rene' Hypes  
Natural Heritage Project Review Coordinator

Cc: Wil Orndorff, DCR-Karst  
Amy Martin, VDWR  
Troy Andersen, USFWS  
Bettina Rayfield, DEQ-OEIR