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Organization: Department of Conservation and Recreation-Division of Natural Heritage

Title: Project Review Coordinator

Comments: Dear Ms. Davalos:

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 its May 2019 comments in italics for the project.

[ldquo]According to the information currently in our files, the Large-leaf phlox (*Phlox amplifolia*, G3G5/S1/NL/NL) has been documented within the project site. Large-leaved phlox, in the phlox (*Polemoniaceae*) family, is a tall perennial herb native to the southern and central US. Stems (one to a few per plant) support a loosely branched inflorescence of red-purple or pale to dark pink flowers that bloom from July to August (NatureServe 2010 and Weakley et al., 2012). In Virginia, occurrences range from a few plants to robust colonies, and several are presumed historical. With the exception of Franklin County, all other occurrences in Virginia are in far southwestern to western counties from Lee to Alleghany (Virginia Botanical Associates 2010). Large-leaved phlox is found within a variety of mostly forested habitats throughout its range; in Virginia, habitats include mesic deciduous woods over limestone, shaded limestone cliffs in a wooded ravine, trailside within a bouldery, mesic, ridgecrest forest, sandstone ledges, well- drained alluvial floodplain forest of mixed hardwoods, rich forest, and a roadside utility line corridor (NatureServe 2010). Threats include direct impacts to plants or destruction/degrading of habitat from timber harvests, development, grazing, vegetation maintenance along trails, roads, and utility lines, trampling, and competition from invasive alien plant species (NatureServe 2010).

According to a DCR biologist, the Large-leaf phlox may be negatively impacted by the proposed clearing activities. DCR recommends avoiding the mapped population of this natural heritage resource (Figure 1).[rdquo]

Below is a statement from the draft Environmental Assessment (EA) regarding the Large-leaf phlox population and potential impacts from the proposed project.

A population of large-leaf phlox overlaps the project area. Part of this population will likely be negatively affected by the proposed action initially. After implementation, the open conditions could allow this flower to seed in from the remaining population outside the area of disturbance. In any event, roughly half of the area identified as the extant population will not be disturbed. Therefore, the proposed action should not affect continued representation of these species on the George Washington and Jefferson National Forests (GWJNFs). Taking no action to implement treatments would maintain the status quo of habitat conditions and trends.

DCR concurs a portion of the population will likely be adversely impacted by the proposed project however is uncertain if the rare plants will re-establish in the cleared areas post-construction as proposed in the EA. Therefore, DCR continues to recommend avoidance of the large-leaf phlox population if possible and if impacts cannot be avoided, we recommend the impact area be as small as possible.

In addition, according to DCR zoologist, the High Knob mimic millipede (*Brachoria insolita*, G1/S1/SOC/NL) may inhabit the project area as it is documented nearby within the High Knob Conservation Site. DCR recommends consulting with Paul Marek, Entomology Department at Virginia Tech (pmarek@vt.edu) to determine if there is potential for this natural heritage resource to occur in the project area.

DCR also recommends the use of native species similar to those found in surrounding areas when revegetating disturbed areas. The native plant materials should preferably come from reputable nurseries propagating their stock from local sources. Some nurseries also offer native wetland species seed mixes. Invasive species should not be used. In open areas, native warm-season grasses, such as big bluestem, little bluestem, Indian grass, broomsedge, panic grass, and gamma grass, offer good alternatives to alien cool season grasses and legumes. If the use of slow-to-establish native species is not practical for projects requiring erosion control, the use of an annual species for temporary stabilization is recommended.

This project is situated on karst-forming carbonate rock and can be characterized by sinkholes, caves, disappearing streams, and large springs. The Virginia DCR karst staff screened this project against the Virginia Speleological Survey (VSS) database and the Virginia Department of Mines, Minerals and Energy (DMME) sinkhole coverage for documented sensitive karst features and caves. To minimize impacts to karst resources, DCR recommends the stabilization of the soil around the site be prioritized during all the phases of the project and all standard erosion control measures that are appropriate for the site be used.

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.

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 activity 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 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. According to the information currently in our files, there is potential for the Northern Long-eared bat (*Myotis septentrionalis*) to occur within the project area. Due to the legal status of the Northern Long-eared bat and the associated final 4(d) rule effective February 16, 2016, if tree removal is proposed for the project, DCR recommends coordination with the USFWS and the VDGIF to ensure compliance with protected species legislation. There is also potential for the little brown bat (*Myotis lucifugus*) and /or the tri-colored bat (*Perimyotis subflavus*) to occur within the project area. Therefore, DCR recommends coordination with the VDGIF, Virginia's regulatory authority for the management and protection of these species to ensure compliance with the Virginia Endangered Species Act (VA ST [§] 29.1-563 [§] 570).

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. Ren[acute] Hypes

Natural Heritage Project Review Coordinator