



April 24, 2019

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Dear Ranger McNichols:

Re: Duncan Knob Gypsy Moth Project Scoping Comments

*Board of Directors:*

*Bette Dzamba*

*Howard Evergreen*

*Katie Keller*

*Brian Lux*

*David Sellers*

*Deirdre Skogen*

*Jamie Trost*

*Ryan Wagener*

*Elizabeth Williams*

Dear Ranger McNichols:

Wild Virginia submits these comments in response to the scoping notice (Notice), dated April 9, 2019, for the referenced proposal. We made comments in response to an earlier scoping notice by letter dated July 26, 2018 and submitted supplemental comments by letter dated October 15, 2018. Although the project proposal has been altered somewhat, many of points addressed in those earlier submissions are still pertinent. Therefore, we are attaching those letters and an additional document submitted in October and incorporate the pertinent information and assertions into these comments.

Before addressing substantive issues of concern, we want to raise two procedural issues:

1. Given the length of time that action has been under consideration by the Forest Service in the Duncan Knob area and the fact that we and other parties have spent considerable time investigating the issues and making earlier comments, providing only 14 days for this comment period is inconsiderate and counter to the goal of having full and effective public involvement.
2. Wild Virginia has on numerous occasions asked the Forest Service to provide digital map layers for its projects in Virginia. With digital data we could understand the proposals being made with more accuracy and clarity and we could incorporate other data available to us to help in analyzing issues and submitting comments. Clearly, the Forest Service has such digital files available and we again ask that they be made available to all on the Forest Service's web site, for this project and for other projects across the George Washington and Jefferson National Forests.

#### Rusty Patched Bumblebee

The Notice states that “[i]t is anticipated the activities proposed can be categorically excluded under several categories including” those described at 36 CFR 220.6(e)(13) and 36 CFR 220.6(e)(6). As also mentioned in the Notice, the use of categorical exclusions (CEs) are authorized only where there are no extraordinary circumstances that may result in significant individual or cumulative impacts.

The presence of potential habitat for the federally-endangered Rusty Patched Bumblebee (RPB), *Bombus affinis*, in the project area and identification of numerous individual RPBs during recent years in the areas around these tracts clearly constitutes an extraordinary circumstance that must be considered.

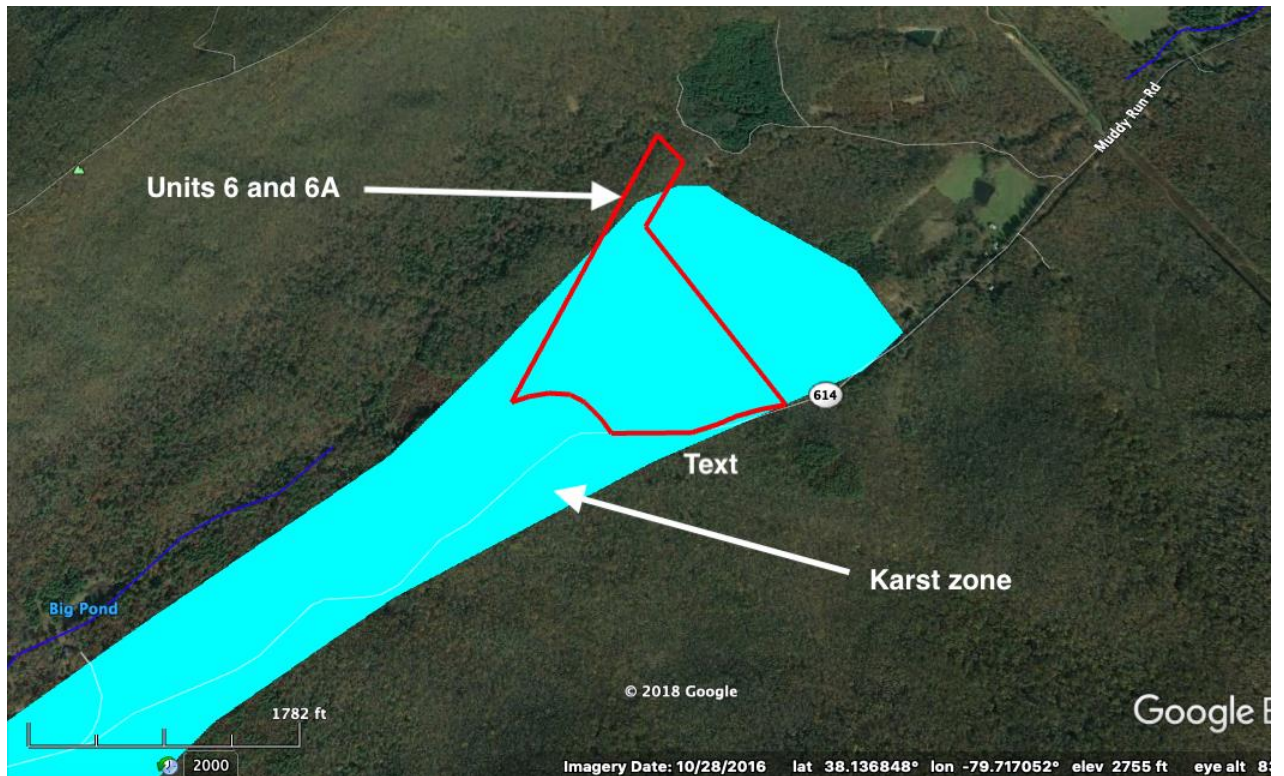
Our October 15, 2018 letter contains significant discussion of this concern, so we refer to that document here. We would note that the current Notice discusses potential positive impacts on pollinator species from this project. However, any positive effects must be weighed against potential harmful impacts to the RPB or other species, which are not acknowledged in the Notice. Further, the analysis for this project must look at possible cumulative impacts from this project, the proposed Atlantic Coast Pipeline (ACP), and any other activities that may contribute to the overall health and survival of the RPB in this area.

We assert that use of a CE for this project would be inappropriate because there is considerable uncertainty about the potential impact on this endangered species. This assertion is supported by an analysis by the U.S. Fish and Wildlife Service (USF&WS) for the ACP. The USF&WS letter submitted as an attachment to this letter explicit states that “[d]ue to the rarity of the [RPB] in VA and uncertainty associated with some RPBB life history requirements, there is uncertainty regarding habitat use and distribution of the species during certain life stages and time periods,” USF&WS letter at 24-25 (emphasis added), and that “[s]tatus of colonies and the population in the HPZ are unknown at this time, Id. at 26 (emphasis added). Importantly, that analysis did not include the Duncan Knob project in its cumulative impacts analysis, despite the fact that this proposal has been known since well before the biological opinion was issued.

#### Water Quality

A thorough analysis of possible impacts to both surface waters and groundwater are necessary and would be best accomplished through an Environmental Assessment (EA). Two particular concerns are as follows:

1. The vernal pool identified just adjacent to unit 4 on the maps with the Notice could be at great risk from activities proposed. As you know, these are relative rare and particularly sensitive environments in western Virginia.
2. Units 6 and 6A in the Notice both lie atop an identified karst layer and proposed temporary access roads are shown to run along the northeast side of the units. This is depicted in the figure below, which uses a data layer from the U.S. Geological Survey in Google Earth. This landscape is characterized by limestone at or near the surface and a high risk of negative impacts on both groundwater and surface waters. The Forest Service should include a thorough survey of karst topography, including but not limited to identification of surface features. Dye tracing and geophysical survey methods may be appropriate. Further, given that both pollution impacts and changes to hydrologic patterns in karst terrain can be observed many miles away from the point of initial impact, this aspect of the proposal must also be analyzed for possible cumulative impacts, along with the ACP which poses serious threats due to blasting and cutting through karst structures.



Karst Terrain Underlying Units 6 and 6A, Duncan Knob Proposal

We strongly encourage the Forest Service to prepare an EA for this project and note that the Service has this option even if a CE could be applied. Here, as stated above, there are a number of factors which cause uncertainty about the likely impacts of this project. You have made great efforts so far to encourage public involvement in this project and we believe a full process that includes and EA and allows the public to be further involved when your draft analysis is available will be both appropriate and useful to your valid efforts to base the decision on the best information available.

Thank you for considering these comments.

Sincerely,

\_\_\_\_\_/s/\_\_\_\_\_  
David Sligh  
Conservation Director