

# JUNIATA VALLEY AUDUBON



18 July 2010

Dear Environmental Hearing Board members;

Juniata Valley Audubon, a regional conservation organization with 450 members in Blair County, PA, is aggrieved by the DEP's issuance of a Permit for Small Noncoal Mining Operations to Catharine Properties, Inc., One Eighth Street, Braddock, PA for a mine in Catharine Township, Blair County.

The DEP's reviewers were negligent in their assessment of the unnamed tributary to the Frankstown Branch of the Juniata River along which a haul road is planned by the developer.

**This stream was mapped improperly by the DEP, which misrepresented the stream length on maps and misrepresented stream quality. This was demonstrated to representatives of Juniata Valley Audubon (Dr. Stan Kotala 814-946-8840 ccwiba@keyconn.net) and the Little Juniata River Association (Bill Anderson bjuniata@verizon.net) during a site visit which they requested with the Pennsylvania Fish and Boat Commission (Steve Kepler, Fisheries Biologist, Environmental Contaminant Specialist, Division of Environmental Services, 814-359-5117, skepler@state.pa.us). A site visit on July 16 revealed strong flow in spite of drought conditions and a robust macroinvertebrate community including many mayflies.**

The proposed limestone quarry adjacent to the Lower Trail in the Covedale area of Catharine Township, Blair County will have a severe adverse impact on the Lower Trail and its users, local residents, the Frankstown Branch of the Juniata River Important Bird Area (IBA), and the Heller Caves Biological Diversity Area (BDA). The BDA and its defined supporting landscape and a portion of the IBA are part of the proposed mine.

The DEP report does not even mention any impact that this quarry will have on the adjacent Rails-to-Trails. Enjoyed by more than 100,000 people annually, the 18-mile Lower Trail [www.rttcpa.org](http://www.rttcpa.org) is one of Blair County's major recreation assets. The trail was recently named a US National Recreation Trail. The Lower Trail is open to the public, free of charge, for hiking, jogging, bicycling, horseback riding, bird-watching, cross-country skiing, and other non-motorized recreation. The Trail also provides access to the river for fishing, kayaking and canoeing.

In addition, the trail and its river valley and adjacent ridge have been designated as an Important Bird Area by the Ornithological Technical Committee of the Pennsylvania Biological Survey. See <http://pa.audubon.org/Sites/Site75.pdf> . This IBA is the site of Pennsylvania's highest concentration of cerulean warblers.

The Heller Caves Biological Diversity Area is habitat for bat species of special concern in Pennsylvania. Heller Caves serve as hibernacula for 100+ eastern small-footed bats (*Myotis leibii*), a Threatened species in Pennsylvania and a "priority species" in the Commonwealth's *Wildlife Action Plan*: <http://www.portal.state.pa.us/portal/server.pt?open=514&objID=621014&mode=2>

The DEP's PNDI review also was deficient. According to the *Blair County Natural Heritage Inventory* done under the direction of the Blair County Planning Commission from 2001-2006, the Heller Caves BDA hibernacula can be destroyed by adjacent blasting or other earth-moving activities that disrupt bedrock. In addition, the *Inventory* states that reduction of forest cover would reduce habitat area for roosting and feeding needed by these bats. According to the Pennsylvania Game Commission "*forested areas with caves, mines, rock outcrops or talus provide key summer habitat*" for small-footed bats.

The *Blair County Natural Heritage Inventory* goes on to state; "*Blasting and other activities that will affect the bedrock should be avoided within this area so as not to damage the cave being used as a hibernation site*" and "*maintaining and cultivating forest cover will increase the amount of available habitat for bats.*"

A new species of springtail was described in the Heller Caves in 2006 - *Typhlogastrura helleri*, named after the Heller family. The .pdf incorrectly describes the cave as being in Huntingdon County; it is located in the border region, but definitely Blair County. There is no Heller Cave in Huntingdon County.

<http://www.caves.org/pub/journal/PDF/V68/v68n2-Christiansen.pdf> . This species occurs nowhere else. It is unique to the Heller Caves.

The DEP report makes no mention of the small-footed bat hibernaculum within the project area, makes no mention of the Heller Caves BDA, makes no mention of the springtail that is unique to the Heller Caves, makes no mention of the Lower Trail, and makes no mention of the fact that the project is within the Frankstown Branch of the Juniata River Important Bird Area.

The mining project has extraordinarily strong opposition, both locally and regionally. It is opposed by Juniata Valley Audubon, the Moshannon Group of the Sierra Club, the Little Juniata River Association, the Mid Atlantic Region of the National Speleological Society, the Pennsylvania Cave Conservancy and the John Kennedy Chapter of Trout Unlimited. A petition started by Catharine Township residents Holly and Mick Tekely already has more than 600 signatures in just the past 2 weeks!

Juniata Valley Audubon (450 members) is unconditionally opposed to any mining activity within 1/4 mile of the Heller Caves BDA and the Lower Trail. **We assert that this permit was granted based on misinformation, particularly regarding the unnamed tributary to the Frankstown Branch of the Juniata River, along which the developer proposes a haul road and stream crossing.**

Sincerely,

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