



# THE WILDERNESS SOCIETY

## Friends of Blackwater Canyon

December 21, 2006

Tom Chapman  
WV Field Office  
U.S. Fish and Wildlife Service  
649 Beverly Pike  
Elkins WV, 26241

Dear Mr. Chapman,

Many organizations and individuals have been following with great interest the U.S. Fish and Wildlife Service's intention to delist the West Virginia Northern Flying Squirrel. We, the undersigned are among that group. All of us intend to submit comments on the proposed delisting of the squirrel.

However, we have identified a problem in being able to provide substantive comments. We have learned that the fundamental agency document that embodies and underlies the agency's basis for the proposed delisting, *The Five Year Review Summary and Evaluation for the West Virginia Northern Flying Squirrel, *Glaucomys sabrinus fuscus**, is still in the process of being reviewed and modified by the Fish and Wildlife Service. The modified version has not yet been issued or posted on the Fish and Wildlife Service website. The currently posted version is not an accurate statement of the agency's basis for its proposed action. Citizens and affected parties have a right to a full comment period on the final and accurate agency proposal, including the documents that embody the agency's rationale. Until a final version of this fundamental document is issued, the Rule Announcement on the delisting proposal should be delayed. The comment process should begin after the correct information, including an accurate listing of all supporting research, is posted on the Fish and Wildlife Service website.

Without waiving any rights to object to the agency going forward with a comment period based on inaccurate documentation and public disclosure, we also request an extension of the current comment period from the current 60 days to 120 days. We understand that the comment period is now scheduled to begin on December 19<sup>th</sup>. Since June 2006 we have been diligently seeking information from the Service on the process and research used in the 5 Year Review and delisting proposal. This information is critical to the submission of substantive comments. Agency delay in providing this crucial information has put all those interested in the future of the

squirrel at a serious disadvantage in being able to comment on this very unusual proposal. An additional 60-day period is necessary so we can have access to all relevant information in the agency's hands, obtain evaluation by appropriate experts, and submit comments.

Thank you for reviewing this request. We look forward to your reply.

Sincerely,



Judith Holyoke Schoyer Rodd  
Director - Friends of Blackwater  
501 Elizabeth St., Room 3  
Charleston, WV 25311  
(304) 345-7663



Mary C. Krueger  
Forest Policy Analyst  
The Wilderness Society  
950 Pearl Hill Road  
Fitchburg, MA 01420  
(978) 342-2159  
[mary\\_krueger@twc.org](mailto:mary_krueger@twc.org)

Jane Keating  
Ohio Valley Environmental Coalition  
PO Box 167  
Huntington, WV 25773-6753

Leigh Haynie, Esq  
Heartwood  
1009 Kidder Road  
Carencro, LA 70520

John Kostyack, Senior Counsel  
National Wildlife Federation  
1400 16<sup>th</sup> St. NW Suite 501  
Washington, DC 20036

Mary Anne Hitt, Executive Director  
Appalachian Voices  
703 West King Street, Suite 105, Boone, NC 28607

Ben Prater, Conservation Director  
Southern Appalachian Biodiversity Project  
191 Merrimon Ave, Asheville, NC 28801

Sarah A. Francisco, Staff Attorney  
Southern Environmental Law Center  
201 West Main Street, Suite 14, Charlottesville, VA 22902

Hugh Irwin, Conservation Planner  
Southern Appalachian Forest Coalition  
46 Haywood Street, Suite 323, Asheville, NC 28801

Tammy Belinsky, Esq  
WildLaw  
9544 Pine Forest Road, Copper Hill, VA 24079

Kieran Suckling  
Center for Biological Diversity  
PO Box 710, Tucson AZ 85702-0710

Virginia Forest Watch  
Sherman Bamford, Public Lands Coordinator  
PO Box 3102, Roanoke, VA 24015

David Muhly, Regional Representative  
Sierra Club - Appalachian Region  
10501 East Bluegrass Trail, Ste 2, Bland, VA 24315

*(Additional Signatures Available Upon Request)*

Cc: Chief Dale Hall  
Director Renne Lohofener  
Regional Director Marvin Moriarty  
Congressman Alan Mollohan  
Congressman Nick Joe Rahall  
Senator Robert C. Byrd