

March 28, 2022

The Honorable Deb Haaland
Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

The Honorable Tom Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

The Honorable Brenda Mallory
Chair
Council on Environmental Quality
730 Jackson Place, NW
Washington, DC 20500

Re: West Virginia “Corridor H” Parsons-to-Davis Highway Project

Dear Secretary Haaland, Secretary Vilsack, Secretary Buttigieg, and Chair Mallory:

We are writing to express serious concerns about aspects of a current “preferred alternative route” for the Corridor H highway project section from Parsons to Davis in West Virginia.

We feel that the current version of this route would create unnecessary and severe adverse environmental, cultural, and community impacts to an important area of West Virginia – one that the late Senator Robert C. Byrd called West Virginia’s scenic “Crown Jewel.”

We ask that your agencies engage with the Federal Highway Administration (FHWA) and West Virginia Division of Highways (DOH) to request that they consider modifying the current preferred route as further discussed in this letter.

Corridor H, which has been in development for decades, connects I-81 near Strasburg, Virginia to I-79 near Weston, West Virginia. A final route selection has not been made for the section in the West Virginia Highlands that would connect Parsons to Davis in Tucker County, and it is this section that is the focus of our letter.

The current DOH preferred alternate route would traverse extremely rugged terrain along Backbone Mountain in the Monongahela National Forest; cross important waterways, including the North Fork of the Blackwater; impair the tranquility of Blackwater Falls State Park and the Blackwater River downstream; negatively impact the historic Blackwater Industrial Complex; and negatively impact habitat for several federally listed endangered species.

Not working to avoid these adverse environmental, cultural, and community impacts is unacceptable to our organizations. Moreover, the DOH examination showed what could be a far less damaging and equally feasible “Northern Route” alternative—north of Thomas—that we believe should be reconsidered.

DOH is updating its 2007 Supplemental Final EIS for this section which chose the current preferred alternative route. In doing so, DOH rejected an aptly named “Blackwater Avoidance Alternative” that would avoid the North Fork of the Blackwater River and numerous adverse environmental impacts. DOH hopes for an Amended Record of Decision from FHWA in 2023, and to begin construction in 2024.

The many adverse environmental, cultural, and community impacts of the route recommended by DOH argue strongly for a revised and reconsidered approach by DOH and FHWA. They also merit support from the resource agencies and active engagement – before DOH proceeds any further to “lock in” a route for this section of Corridor H.

We appreciate your consideration of our request that the FHWA and DOH re-examine the current preferred route, re-weigh it against a Northern route, north of Thomas, and select that one so that construction can proceed in a timely fashion that does not cause as severe adverse impacts.

Sincerely,

Judy Rodd
Executive Director
Friends of Blackwater

Kevin Colburn
National Stewardship Director
American Whitewater

Angie Rosser
Executive Director
West Virginia Rivers Coalition

Ted Illston
Senior Director, Policy & Government
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American Rivers

Larry Thomas
President
West Virginia Highlands Conservancy

Brad Riffie
President
West Virginia Council, Trout Unlimited

Steve Moyer
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Kristin Alexander
Executive Director
Potomac Valley, Audubon Society

Hannah Clipp
President
Mountaineer Chapter, National Audubon
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Kelly Pack
Senior Director of Trail Development
Rails to Trails Conservancy

Mel Waggy
Public Lands Committee
WV Chapter, Sierra Club

Jesse Walls
Senior Director, Government Affairs
National Audubon Society

Neal Barkus
President
Conservation West Virginia

Laura Finch
President
West Virginia Scenic Trails Association

Danielle Parker
Executive Director
Preservation Alliance of West Virginia

Jill Gottesman
Southern Appalachian Program Director
The Wilderness Society

Kevin J. Coyle, JD
Counsel to the President and CEO
National Wildlife Federation

CC: The Honorable Joe Manchin, United States Senate
The Honorable Shelley Moore Capito, United States Senate
The Honorable David McKinley, United States House of Representatives
Jordan Tannenbaum, Acting Chair, Advisory Council for Historic Preservation
Ed Gaunch, Secretary, West Virginia Department of Commerce
Brett McMillion, Director, West Virginia Department of Natural Resources
Jimmy Wriston, Secretary, West Virginia Secretary of Transportation

Addendum: Parsons-to-Davis Project Current Preferred Route Adverse Impacts

Cultural Concerns: The Blackwater Industrial Complex is a significant concentration of contiguous, interrelated historic industrial and archeological resources throughout the Blackwater River corridor from Thomas to Hendricks. Twenty years ago, the National Park Service and Advisory Council for Historic Preservation determined that the Blackwater Industrial Complex is eligible for the National Register of Historic Places. It includes the town of Thomas's Historic Commercial District, town of Douglas, the Davis Coal and Coke Building which is on the National Register of Historic Places and the Buxton Landstreet Building which has been nominated to the National Register, as well as many cultural remains along the Blackwater Rail Trail. DOH's preferred alternative route transects this historic corridor and would severely damage its historic condition *by placing a 4-lane highway directly overhead.*

Water Quality Concerns: Despite the EPA issuing an environmental concern rating in its initial NEPA analysis, DOH plans to build the highway directly across the North Fork of the Blackwater River negatively impacting the water quality of the North Fork "formerly, an outstanding trout fishery" and the famous Blackwater River and Canyon just downstream from the highway. The North Fork of the Blackwater is a popular tourist and recreation area with a new multimillion-dollar recreation trail and bridge planned to link the Blackwater Rail Trail to Blackwater Falls State Park. The Blackwater River is designated as a West Virginia Critical Resource Water and has been deemed eligible by the Monongahela National Forest for Wild and Scenic River designation. The resulting sedimentation from the highway building process could easily wipe out the established trout fishery upstream in the Blackwater, as has happened in the adjacent section of highway that is being built. The preferred alternative would without doubt change the eligibility of the Lower Blackwater Canyon for a potential Wild and Scenic River designation.

Beginning in the late 1800s, the Blackwater River suffered extreme environmental degradation from deep coal mining and coke production. DOH's route crosses the river just southwest of Thomas, WV, where historical maps show there was a maze of coal mines that are now filled with acid mine pollution. Today the acid mine drainage (AMD) is largely in check on the Blackwater River and the remediation has been a success, even winning an award from the Office of Surface Mining. The North Fork of the Blackwater River, however, remains an area of concern because of the historic underground coal production that occurred there. Current efforts are underway to restore this river and any construction of highway footing in this area will release of AMD and imperil the water quality of the Blackwater and Cheat Rivers downstream.

Species Concerns: The DOH preferred route would adversely impact the Virginia Big-eared Bat, Indiana Bat, and Cheat Mountain Salamander, all federally listed species under the Endangered Species Act. Although WV's Department of Highways concluded that its preferred route would have "no adverse impact" on species, based on a 2001 Biological Opinion, current facts on the ground are now decidedly to the contrary. For example, DOH concluded that in its study area there were no essential habitats or caves for the Virginia Big-eared Bat. Since then, findings by the DOH show that this bat does reside along the route and inhabits old mine tunnels directly along the route.

Community Concerns: The towns of Thomas and Davis are separated by only 2.8 miles. The DOH's proposed route would divide the two historically linked towns. This area is known for Blackwater Falls State Park, trout fishing, hiking and biking trails along the Blackwater Canyon, the North Fork of the Blackwater, canoeing, and classic whitewater paddling on the Blackwater River and nearby creeks. The proposed route would impact Blackwater Falls State Park's effort to obtain a Dark Sky certification, which would be a large tourism draw for astronomy enthusiasts. For these reasons, local stakeholders object to DOH's route. The DOH preferred route would add major elevated ramps and lead to commercial development that would alter the significant ecotourism and historic appeal of these towns.