

FRIENDS of BLACKWATER

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FEDERAL PROJECT: ACNH-0484(290)

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Friends of Blackwater is writing to comment on the issue of Corridor H alignment from Parsons to Davis in Tucker County, West Virginia. Friends of Blackwater is a nonprofit located in Tucker County, West Virginia with 5,000 active members dedicated to protecting the Blackwater Canyon and Allegheny Highlands and promoting the sustainable human and community interests in the region. Comments have been grouped by topic and address environmental, economic, tourism development and safety concerns.

Virginia Big Eared Bat

The Virginia Big Eared Bat is an endangered species with habitat in West Virginia. The Corridor H Supplemental Final Environmental Impact Statement states that the proposed Corridor H expansion would have “no adverse effect” on the species based on a Biological Evaluation from 2001. This was concluded based on “no essential habitats or satellite caves occurring within the Study Area.” However, more recent findings show that this species of bat reside along the

current “preferred” alignment, near the Blackwater Industrial Complex. This bat species continues to inhabit old mine tunnels here. The 2016 Appalachian Corridor H Parsons to Davis Section Bat Acoustic Survey found evidence of the bat species in the proposed Corridor H pathway. As such, it is our opinion that a new Biological Evaluation needs to be completed to further investigate the issue. The construction of Corridor H between Parsons and Davis could both damage their habitat and create road hazard affecting the bats’ flight, hunting, mating and other life patterns. Failure to do so may have adverse effects on the species population and violate with the Endangered Species Act. Consultation will need to be done with the Fish and Wildlife Service.

Northern Long Eared Bat

The Northern Long Eared Bat (NLEB) was listed as endangered on November 29, 2022. New protocols will be developed for this listed bat and it is expected that the West Virginia Division of Transportation will have to resurvey the land they plan to impact on their “preferred” route. This especially applies to any tree cutting done for the route as these bats forage under the canopy of large trees. We know that the Monongahela National Forest found a number of these rare bats on their Upper Cheat timber project which overlaps with the Corridor H alignment near the high school so more work will have to be done in this area.

Rusty Patched Bumblebee

This newly listed pollinator was found on the Monongahela National Forest near the Corridor H alignment. Any core drilling or other land disturbance, no matter how small must be held off until there is consultation with the Fish and Wildlife Service. This bee has almost been driven to extinction by the use of herbicides so no herbicides should be used in this area. The queen bee overwinters underground and can be killed by land disturbance. Additional surveys should be done and areas with these bees avoided.

Cheat Mountain Salamander

The Cheat Mountain salamander is a federally listed species found at high elevations particularly associated with conifers. These facts indicate that this salamander could be found along the current “preferred” alignment in the area of Big Run Bog the high school and down toward Mackeyville road. We understand that surveys for this salamander have not been completed. Until the survey have been completed next summer no land disturbance including tree cutting on this alignment should take place.

West Virginia Northern Flying Squirrel (WVNFS)

While the WVNFS is not a federally listed species it is protected on the Monongahela National Forest. Consultation with the US Forest Service should be done regarding the WVNFS and the Forest Service should do surveys for the squirrel before allowing any change to the MON in WVNFS habitat which is similar to that described for the Cheat salamander.

Blackwater Industrial Complex

The current “preferred alignment” for the Corridor H Parsons to Davis segment runs straight across the 11 mile long Blackwater Industrial Complex in an area approximately half a mile southwest of Thomas, WV. Our concern is that the construction in this region could directly and indirectly damage and degrade the artifacts of regional historical significance, including coal industry equipment such as coke ovens and railroads. These artifacts are important to the region’s cultural and economic history. Additionally, should Corridor H be constructed across this location, access to these artifacts may be further hindered by the highway. Access trails and paths may be cut off or left unusable by construction. As such, the Blackwater Industrial Complex may lose part of its historical significance. Much of the Blackwater Industrial Complex is owned by the Monongahela National Forest (MON). The WVSHPO and the Advisory Council on Historic Preservation are consulting agencies as well. Consultation with these federal and state agencies is necessary under the 106 process for highway construction. Any proposed re-evaluation studies and approval for new studies should be subject to NEPA processes including public comment on studies and work plans. Recent research on the African American community of Coketon has identified a historically unique and significant African American school (foundation still in place) and church at Coketon near the footprint of the “preferred” alignment of Corridor H west of Davis. These sites directly implicate environmental and racial justice concerns that have not been considered by WVDOT. Additional concerns related to environmental justice are construction that will degrade an area of extreme poverty in the Davis section at Coketon.

Loop Trail

Friends of Blackwater has major funding from the state and federal government to complete the Blackwater Loop Trail that goes through the Blackwater Industrial Complex at Coketon and uses interpretive signs to tell the story of the railroad as well as the coal and coke industry, the timber industry and the workers who built these industries and these towns. The massive bridge of the “preferred route” over this trail will undermine its economic development potential and set back its construction for many years.

Acid Mine Drainage

Mining problems in the Thomas area are well known by the WVDEP and stem from strip mines, deep mines, coal mine subsidence, and acid mine drainage (AMD) polluted water. The proposed “preferred alignment” bridge for the Corridor H between Thomas and Davis crosses the North Fork of the Blackwater River approximately half a mile southwest of Thomas, WV. Based on historical maps and more recent surveys, the hillsides on either side of the river are a maze of old coal mine tunnels. These tunnels are filled with acid mine drainage pollution which is at the southern end of the Coketon Mine Pool. One low point in this system of connected tunnels is Mine Portal 29 which produces major flows of untreated polluted water just east of the preferred alignment. As such, our concern is that any major construction including blasting of a roadway/bridge here could cause increased acid mine drainage from these old mines to escape and make its way into the Blackwater River. Additional acid mine drainage comes from the Long

Run tributary entering the North Fork at Douglas. This pollution also comes from old mine tunnels that the Corridor H “preferred route” will cross over further west. The North Fork is also polluted by Burns Blow-Out across the river from Mine Portal 29. This bad water seems to originate from the Buffalo Coal Bond Forfeiture site which has old coal mine tunnels topped by a strip mine. This is the location of the “preferred route” as it approaches the bridge over the North Fork. Part of Pendleton Creek may be adding to this bad water as it disappears down a large hole just off the Buffalo Coal site, reappearing at Burns Blow-Out. None of these sites of acid mine drainage pollution are currently treated. Adding to this an increase in AMD through construction and blasting disturbance would have a large negative impact on the ecology of the river downstream and could affect drinking water, outdoor sport and tourism such as fishing and kayaking. The preferred route proposal does not go into any significant detail about this issue, offer mitigation options, etc.

Pendleton Creek has unreclaimed mining sites on the east side of route 32 where WVDOT has recently planned a truck route for Thomas. Mine tunnels in this area create AMD which flows underground to Thomas where it enters the North Fork adding to the pollution in the North Fork. Construction and blasting here could increase acid mine drainage to the North Fork of the Blackwater.

AMD Treatment at Coketon

Friends of Blackwater have been working for several year planning an active treatment system for the North Fork which is near completion. We hope to begin construction in the coming year. The system is calibrated to deal with the current level of AMD pollution from the three main sources on the North Fork. This treatment system can bring back a trout fishery to the North Fork and allow a reproducing fishery in the main stem of the Blackwater. These outcomes are put at risk by the WVDOT’s “preferred route” in this area.

Route 32 Intersection

The towns of Thomas and Davis are currently connected via County Route 32. The preferred route would intersect this two-lane route between the two towns. This intersection and the related section of Corridor H would be a major visual barrier and interrupting eyesore in the middle of Rte 32, and a source of substantial noise and air pollution. The intersection, however configured, would insert a large and ever-increasing zone of 24/7 fast-moving traffic, noisy trucks, roadway lighting, etc. into and across this relatively quiet rural two-lane road. The Route 32 intersection would inescapably become a hub of stereotypical cookie-cutter highway interchange development, polluting both Towns’ key entranceways. It would completely change the area’s current rural, nature-based, visual and cultural connection and heritage tourism appeal -- that currently characterizes and links Thomas and Davis – and degrade it for drivers, cyclists, and pedestrians, for local citizens and for visitors. Such an eyesore, and the attendant (and ever-increasing) traffic and noise barrier, would burden and degrade the experience of travel both to and between the two towns. It would detract from the experience of tourists visiting natural and heritage attractions in the region, including Blackwater Falls and Canaan Valley. Creating a “takeoff and landing point” for Corridor H - based traffic between Thomas and Davis would

damage the local tourism-based art and business community. We believe that studies of the economies of these two towns will show that increased economic development here has been caused by unique small business development catering to a population looking for small scale, historic landscapes -- not modern “super slabs,” franchise and chain outlets, and box stores. A major highway interchange inserted into the middle of the Route 32 zone will undermine the local sustainable economy, not grow it.

Damage to Blackwater Falls State Park and the Monongahela National Forest.

The remarkable collection of public land along the “preferred alignment” will be negatively affected by the construction of Corridor H in the Parsons to Davis segment. Blackwater Falls State Park is famous for its peace and quiet and its exquisite view of the night sky. The preferred highway route and its 24/7 four-lane high-speed traffic will be viewable from multiple locations in Blackwater Falls State Park, the most visited state park in West Virginia. Lights, noise and air pollution will degrade the Park experience and undermine its attempt to get night sky certification. The State Park is a key source of revenue and jobs for Tucker County, with one million visitors a year. These visitors also shop, eat, and lodge at local tourism businesses increasing revenue to locally owned private enterprises.

The Monongahela National Forest would also be negatively impacted by the “preferred alignment,” which will damage the Blackwater Industrial Complex, for which the Mon is responsible. Many Mon Forest acres would be taken near Big Run Bog, along historic Forest Road 18 and 717 to the Olson Fire Tower, and down the mountain to Mackeyville Road. Converting this section to a three-lane road would be much less destructive.

Safety Impact on Tucker County High School

The proposed preferred alignment of Corridor H would in our opinion create potentially unsafe conditions with the Tucker County High School Connector. The additional traffic near the school could create hazards for persons entering and leaving the school. In addition, Tucker County High School is located on Backbone Mountain which is known to be shrouded in fog in the early mornings and covered with snow in winter when students and teachers would be driving to the school. Further, high school students are new drivers and may not be the best at driving in foggy or high traffic conditions. These factors combine to create a higher likelihood of car accidents and other issues at the proposed Tucker County High School Connector. This portion needs to be redesigned

“Go North” Eastern Route around Thomas

A much better route for Corridor H would be one that looped north of Thomas, WV going east of the landfill and cross above the Town Park and lake and below route 90 and the Thomas water source with a truck exit onto Route 90 leading to Route 219 north to Maryland. This route would avoid many of the concerns outlined above while also achieving the objectives of the Corridor H completion in the Davis to Thomas area. It would maintain the close connection between Thomas and Davis without a large highway intersecting the towns. Access to Tucker County High School would be via US 219 as is the current situation, limiting traffic and a potential unsafe situation near the school. This route would avoid the historical area of the Blackwater

Industrial Complex and the area where the Virginia Big Eared Bat has been documented. Further, it would succeed in lowering the amount of truck and other commercial traffic going through Thomas and Davis without the need for an additional truck route.

High School to Mackeyville Road

Friends of Blackwater believes that the section from before the high school to the Mackeyville Road should be constructed as a scenic two lane road with numerous pull offs to avoid damage to the Monongahela National Forest land, to native brook trout streams, the West Virginia northern flying squirrel protected on the MON, to cultural resources and other resources not yet identified.

Friends of Blackwater, Inc. requests that the WVDOT prepare alternative routes for the public to review when they announce their Draft Supplemental EIS in the coming years and include a route that goes north of Thomas to avoid the Blackwater Industrial Complex, the towns and Blackwater Falls State Park and Canyon. Once beyond this area and beyond Benbush and Pierce the route could follow and enlarge Route 219 all the way past the high school. This alternate route could be built as a three lane to reduce impacts to private property owners and to avoid environmental damage.

Thank you for considering these issues.

Judith Rodd for Friends of Blackwater

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Determination of Eligibility Notification for the Blackwater Industrial Complex from the Keeper of the National Register 2001.

Additional documents available upon request.

