

FRIENDS of BLACKWATER

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Attn: Mr. R.J. Scites, P.E.

Director, Engineering Division

West Virginia Division of Highways

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Charleston, West Virginia 25301

Corridor H – Parsons to Davis X142-H/-38.99 Sec 02

CHHD-0484(059)

Tucker County

Responder: Friends of Blackwater

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Friends of Blackwater is writing in response to the proposed re-examination 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 4,000 activist 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 Habitat Damage

The Virginia Big Eared Bat is an endangered species with habitat ranging throughout 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 may violate with the Endangered Species Act.

Impact on the Blackwater Industrial Complex

The current preferred alignment for the Corridor H Parsons to Davis segment runs straight across the Blackwater Industrial Complex approximately half a mile southwest of Thomas, WV. Our concern is that the construction in this region could damage the artifacts of regional historical significance including coal industry equipment such as coke ovens and railroads. These artifacts are important 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) and consultation with this federal agency is necessary. Any proposed re-evaluation studies and approval for new studies should be subject to NEPA processes including public comment on studies and work plans on any portion of the MON.

Additional Acid Mine Drainage in the Area of the Blackwater River

The proposed preferred alignment for the Corridor H Thomas to 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 earth on either side of the river is a maze of old coal mines. These tunnels are filled with acid mine drainage pollution which form the Coketon Mine Pool. The low point in this system of connected tunnels is Mine Tunnel 29 which produces major flows of untreated polluted water just east of the preferred alignment. As such, our concern is that any major construction of a roadway here could cause increased acid mine drainage from these old mines to escape and make its way into the Blackwater River. This would have a large negative impact on the ecology of the river and could affect drinking water, outdoor sport and tourism such as fishing and kayaking. The current proposal does not, in our opinion, go into detail about this issue, offer mitigation options, etc.

Creating an Artificial Barrier between Davis and Thomas and negative economic impacts

The towns of Thomas and Davis are currently connected via the Appalachian Highway, Co. Route 32. The currently proposed location for the Corridor H route would cross the Appalachian Highway between the two towns, which in our opinion, would create a visual barrier between the two towns. The current plan

shows Corridor H having an overpass over the Route 32 with on and off ramps on either side. Further there is the possibility of typical off ramp stores such as gas stations and fast food stores popping up. Together, this would create a visual barrier that breaks up the two towns and interrupts the cultural connection. This modern concrete structure undermines the heritage tourism appeal of both Thomas and Davis. The barrier could reduce tourist travel between the two towns and deter tourists visiting natural heritage attractions in the region, including Blackwater Falls and Canaan Valley, from also visiting Thomas. This in turn could have an adverse effect on the local art and business community which relies largely on tourist traffic.

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.

Eastern Route around Thomas

It is our belief that a better alternative route for Corridor H would be one that looped north of Thomas, WV going on the east side of the town. This route would avoid or mitigate 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 explicit 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.

Bibliography

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