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November 13, 2023

Mr. Travis Long
Director Technical Support Division
West Virginia Division of Highways
1334 Smith Street
Charleston, West Virginia 25301

RE: Corridor H: Wardensville to VA Line
X316-H-125.16
NHPP(0484)118
Hardy County

SENT VIA EMAIL TO travis.e.long@wv.gov

Dear Mr. Long,

Thank you for the opportunity to again highlight the concerns conveyed in our December 12, 2022 comments on the proposed development of Corridor H from Wardensville, West Virginia to the Virginia state line. We remain deeply concerned about the significant negative impacts on communities and natural and cultural resources in Virginia that will occur following the development of the Wardensville to state line segment in West Virginia. Because of the significance of these future impacts, Alliance for the Shenandoah Valley formally requests that a Supplemental Environmental Impact Statement be completed to fully assess the alternatives.

Alliance for the Shenandoah Valley is a regional nonprofit, working to conserve the natural resources, cultural heritages, and rural character in six counties in Virginia's Shenandoah Valley. We were formed in 2018 from a merger of four long-standing county-based conservation groups and have been working for more than two decades to promote sensible, data-driven transportation improvements.

If Corridor H is ever to continue east past the state line, the possible routes for Corridor H in Virginia are generally assumed to be along the Route 55 corridor—running from the state line east of Wardensville through Shenandoah County to connect with I-81 near Strasburg, Virginia. This is not a suitable corridor for a major highway. It is a narrow mountain road with significant forest resources, headwater streams, historic sites and private homes and businesses.

There is very little support for building Corridor H in Virginia, and we are not aware of any state or local transportation planning for such an expansion. However, even with no construction in Virginia, the consequences of taking a four-lane divided highway right up to the state line are potentially severe. Why expand east of Wardensville when the road will end at the state line? The costs are much too high—financial costs, environmental costs, and costs to the local communities.

The Alliance agrees with and supports the resolutions adopted by the Shenandoah County Board of Supervisors and the Strasburg Town Council opposing construction of Corridor H in Virginia. According to the letter submitted to you by the Shenandoah County Board of Supervisors:

There appear to be no benefits to the citizens of Shenandoah County that would result from constructing a Corridor H highway to connect with I-81 and/or I-66 near Strasburg, Virginia.

In fact, we believe that building an interstate of this magnitude to the Virginia line would have significant adverse impacts on communities in Shenandoah County and this must be considered before construction of the 6.8-mile section proposed from Wardensville to the Virginia state line begins.

Shenandoah County officials go on to describe the specific natural and cultural resources that would be negatively impacted by the continued eastward expansion of Corridor H in the resolution: “said route through Shenandoah County would likely be harmful to farms, private homes, and public-use facilities such as churches, community centers, lodges” and “said route would cause irreversible damage to the Cedar Creek and Belle Grove National Historical Park and the Fishers Hill Civil War Battlefield.” Officials in the Town of Strasburg expressed similar concerns.

Community members here are worried about their rural and scenic lands, their quality of life, and their historic and natural resources. Leading economic sectors, including agriculture, tourism, and outdoor recreation, rely on the protection of these resources, which are threatened by the proposed Corridor H development.

Specifically, we are concerned that resources on George Washington National Forest (GWNF) will be negatively impacted. Corridor H improvements east of Wardensville would cut through North Mountain and the Great Eastern Trail, which is an important wildlife corridor. Further it would negatively impact the scenic and natural resources on the Jonnies Knob area of the GWNF, in Frederick County. And, importantly, Corridor H would diminish resources on the 30,129-acre Big

Schloss roadless area in Frederick and Shenandoah counties in Virginia and Hardy County, West Virginia.

- The Big Schloss roadless area is one of the largest inventoried roadless areas not only on the GWNF, but on any eastern National Forest. Within the Big Schloss roadless area is the 7,500-acre Big Schloss Special Management Area and the Salus Spring Special Biological Area.
- The upper reaches of Stony Creek, Paddy Run, and Cove Run have their beginnings in Big Schloss. Fishing opportunities are well known in Little Stony Creek, a native trout stream. These are all tributaries of Cedar Creek and the North Fork of the Shenandoah River.
- Recreational activities are the highlight of the area. Hiking, backpacking, horseback riding, and mountain biking are the primary recreational activities. In the late fall hunters take to the woods in large numbers.
- This is an area that Shenandoah County's Comprehensive Plan intends to be protected, under Goal 3.2, "Protect forested areas throughout the county from conversion to other uses" and objective 3.2.4 which states, "Establish Big Schloss National Recreation / Scenic Area" and "Support the establishment of Big Schloss National Recreation / Scenic Area" (Shenandoah 2045: A Future Together, p. 44).

We are also concerned about impacts to nationally-important historic resources. An eventual route through Virginia would directly affect Cedar Creek and Belle Grove Historic Park.

- In addition to being a National Park, listed on the National Register of Historic Places as a National Historic Landmark, Cedar Creek was determined by the Civil War Sites Advisory Commission to be one of the 25 most important Civil War battlefields in the nation.
- Fisher's Hill battlefield, also in the area to be impacted by Corridor H, was also determined by the National Park Service and the Virginia Department of Historic Resources to be National Register eligible.
- The Strasburg Comprehensive Plan identifies land use principles, including for the, "Route 11/I-81 Interchange and Route 55 Corridor ... Land uses north of the interstate and east of the railroad tracks shall consider compatibility with the 'National Park experience'" (Strasburg Comprehensive Plan 2018, Page 22). While no planning or mapping has taken place to identify the exact location of Corridor H in Virginia, it would almost have to involve this area. An interstate-scale highway is in no way compatible with "the National Park experience." This plan designation is presumably to protect the town's proximity to the Cedar Creek and Belle Grove National Historical Park, to which it would cause irreversible damage.

In addition to our concerns, we encourage you to consider the numerous comments submitted by Wardensville-area residents, citing concerns about groundwater, safety, and diminished main street economic development and local quality of life.

For all these reasons, we urge you comprehensively consider the impacts of the proposed highway development to the surrounding resources, and we request that a Supplemental Environmental Impact Statement be completed to better understand the impacts on Virginia and

West Virginia communities and most effectively, efficiently, and reasonably meet transportation needs in the region.

Thank you for your consideration of our comments. I welcome you to contact me directly at any time to discuss our concerns, you can reach me on my cell phone at 540.244.7809.

Sincerely,



Kate G. Wofford
Executive Director

cc: Thomas L. Nelson, Jr., Federal Highway Administration

Enc: Shenandoah County cover letter and resolution October 11, 2022
Town of Strasburg cover letter and resolution, December 6, 2022