



Stewards of the Potomac Highlands

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PotomacHighlandStewards.org

Comments from Stewards of the Potomac Highlands

On Corridor H Supplemental Environmental Assessment Wardensville to Virginia Line June 1, 2025

To: Mr. Douglas W. Kirk, Douglas Kirk, Environmental Compliance Officer,
WVDOH douglas.w.kirk@wv.gov

Ms. Sarah Runyon, P.E, Deputy Chief Engr., WVDOH Sarah.l.runyon@wv.gov

Mr. Jeffrey Blanton, FHWA Administrator WV jeffrey.blanton@dot.gov

Mr. Jason Workman, FHWA Director, Program Development jason.workman@dot.gov

Stewards of the Potomac Highlands is a 501c4 nonprofit environmental group in West Virginia's northeastern counties dedicated to protecting our natural environment and supporting an environmentally and socially sustainable, locally-controlled economy. Since 2022, as WV Division of Highways has renewed public environmental reviews of Corridor H planning from Wardensville to the Virginia line, we have been requesting that WVDOH and Federal Highway Administration conduct a complete updated supplemental draft EIS for this section, as required by FHWA regulations, 23 C.F.R. § 771.115(a)(2) (an EIS is normally required for "A highway project of four or more lanes on a new location"). .

There have been significant changes to the project, and new issues that must be examined in the 22-30 years since issuance of the Final EIS for the entire Corridor H project in 1996 and the amended ROD for Wardensville-Virginia Line in 2003. A supplemental EIS *must* be prepared where there are "Changes to the proposed action would result in significant environmental impacts that were not evaluated in the EIS; "or there is "New information or circumstances relevant to environmental concerns and bearing on the proposed action or its impacts would result in significant environmental impacts not evaluated in the EIS." *Id.* § 771.139(a)(1) lk These include:

Purpose and need:: Since the Commonwealth of Virginia decided in 1995 not to build the originally-planned 15 mile section of Corridor H in Virginia, the Wardensville-VA Line section offers less purpose and need since it will not connect I-79 with I-81 and 66. Yet elected officials and leaders in the West Virginia Division of Highways in public statements continues to refer to Corridor H as connecting to I-81 and I 66 and has even made statements saying the four-lane will go into Virginia. <https://www.wboy.com/road-patrol/whats-the-latest-on-west-virginias-top-highway-project/>

For FHWA to invest at least \$485 million in federal money to build a four-lane highway to the border of Virginia, without the two states agreeing on a plan, seems at best an extreme waste.

Traffic Does Not Justify: Corridor H, Wardensville-VA Line is also an unneeded investment because the area is still lightly populated and traffic counts, even 25 years after the Final EIS, reflect that. WVDOH's AADT statewide map <https://gis.transportation.wv.gov/aadt/> shows a range of approximately 2,500 to 3,174 vehicles per day on WV 55 from Wardensville to the VA border. Compare this with the standard cited in Purdue University Road School,

<https://docs.lib.psu.edu/cgi/viewcontent.cgi?params=/context/roadschool/article/2002&path_info=09_RS_1931_Traffic_Capacity.pdf> which on page 5 says, “Our conclusion is that a two-lane highway can carry from 6,000 to 10,000 vehicles per day, depending upon the distribution by direction and the uniformity of speeds.”

Nor is the Supplemental EA’s assumption (SEA at p. 35) that the new highway is needed to improve the safety of vehicles pedestrians and bicycles bolstered by any accident data demonstrating any safety problem. By contrast, the exits that WVDOH designed for the termination of the Baker to Wardensville section of Corridor H on Trout Run Road turned out to be narrow, curvy, and steep. This resulted in “dozens of accidents,” See comment letter of Wardensville Mayor Betsy Orndoff Sayers (Nov. 2023).

Costs, Benefits, Secondary Impacts: The 2025 SEA fails to analyze the cost/benefits of No Build and of spot improvements to the existing Route 55, in terms of fulfilling the now-limited Purpose and Need of improving road transportation and enhancing the quality of life from Wardensville to the Virginia line. The global rejection of the road improvement alternative in the 1996 EIS for the entire 100-mile corridor must be revisited in the context of the Wardensville to VA segment and in light of changes in the intervening 35 years. For

example, the recent Corridor K project in North Carolina and Tennessee offers a more appropriate precedent of using Appalachian Corridor money to build a highway through mountainous areas with spot road improvements rather than a continuous four-lane design, adapted to the locale: <https://www.ncdot.gov/projects/corridor-k/Pages/default.aspx> and <https://www.tn.gov/tdot/projects/region-2/us-64-corridor-k.html>

The attached comments of Allegheny Blue Ridge Alliance/WV Highlands Conservancy point out that the SEA completely fails to analyze cumulative and secondary impacts of Corridor H. In addition to effects on air quality and climate, the four-lane would enable polluting industries such as CAFOs to increase their presence in saturated areas like Moorefield, WV and to set up in places they don't exist now. NEPA requires a "hard look" at all reasonably foreseeable environmental effects, including direct project emissions (e.g. construction equipment exhaust and increased vehicle traffic) and indirect emissions (e.g. induced travel demand, and development spurred by the new highway).

We would add that in addition to CAFOs, a new EIS should study the probability that a new four-lane would encourage the building of data centers like those already operating near the abundant highways in Loudoun and Fauquier Counties, VA, and being proposed near the planned section of Corridor H in Tucker County, WV. Data centers' huge computer buildings, power plants and transmission lines not only impact scenery and cause noise and light nuisances; their heavy consumption of electricity and water impacts the whole region where they are located. <https://youtu.be/fAPusgiz4B8?si=wttO6ww0kz-jLm8y>

Impacts on Virginia: Because a four-lane built to the state line presumes a certain trajectory into Virginia if Corridor H is ever continued, Virginians are hastening to comment on the Wardensville-VA Line section now. Letters from Virginia government, environment, and history groups point out potential impacts on resources on or just east of the State Line, including the Tuscarora Trail on top of North Mountain and the Shenandoah Battlefield District from near the state line to the I-66 and 81 intersection near Strasburg, as well as to area species under review as endangered and threatened, such as the Wood Turtle. No final EIS has been done on the potential Virginia Corridor H section because Virginia dropped out of the highway project in 1995. This leaves environmental and social impacts in need of examination.

Shenandoah Alliance specifically asked in their *Nov. 2023 letter of comment, attached* for Virginia government entities and organizations to have input for the Wardensville-to VA Line section of Corridor H, and repeated this request in joining the *May 29 2025 environmental coalition letter to the GW Forest*. Strasburg, VA mayor Brandy Hawkins Boies wrote in a

Corridor H comment letter of May 28, 2025 after the Town Council passed a resolution renewing the town's opposition to Corridor H, attached, citing "increased traffic volumes, strain on public services, and irreversible harm to local farmland and historic landscapes such as Fisher's Hill and the Cedar Creek and Belle Grove National Historical Park. We are particularly concerned that this project does not align with any current local or long-range transportation plans in Virginia and that cross-border impacts have not been adequately evaluated." Belle Grove Plantation Inc., the area's keystone Civil War national park destination located just north of GW Forest land (Lee Ranger District) with its own set of hiking trails, joined the call for evaluating Virginia impacts in their Corridor H comment letter of May 29.2-25. Attached.

Federal Agency Carts-Before-the-Horse: A coalition of environmental and history groups, who study and protect rivers and trails and historic sites in the vicinity of George Washington National Forest point out that FHWA and WVDOH should be seeking the appropriate permits before the NEPA process is completed for the Wardensville-VA Line section. Stewards is a signatory in the coalition's *attached letter to GWNF of May 29, 2025.*

Specifically, WVDOH and FHWA need to see that Section 401 and 404 permits to cross streams are completed first in order to inform the public of impacts to streams via the NEPA process. As the *attached comment letter May 30 from WV Rivers* point out, the SEA indicates that bridges will be longer than in the original plan in an effort to reduce direct impacts to surface waters, yet the SEA also asserts that the expected impacts to streams and wetlands will increase. This discrepancy should be evaluated as part of the necessary updates to the Section 404 permit with the U.S. Corp of Engineers (i.e., "dredge and fill" Clean Water Act permit. See *Coalition Letter to GW Forest May 29.* See *WV Rivers comments Dec. 12, 2022 and repeated in their comment of May 30, 2025, attached,* showing over 50 WVDEP-documented violations by WVDOH contractors in the EArlier built Kerens to Parsons section of Corridor H . Our concerns about roadbuilding damage to water resources are based on unfortunate experience.

Another cart before the horse is the omission of a Special Use Permit (SUP) required for construction within the GWNF. The SUP should inform the NEPA process and should not be postponed until highway agencies are on the verge of construction, the conservation coalition's letter points out. WVDOH is shirking its public duties by pursuing a Letter of Consent from GWNF, attempting to avoid the requirement for a Special Use Permit. The US Forest Service normally sends out a scoping notice and solicits public comments before issuing a SUP. The Letter of Consent procedure WVDOH now proposes to follow would skip over the process that ensures public input. The conservation group coalition, and the

comment letter from ABRA and WV Highlands Conservancy, spell out the implications of the missing SUP in its May 29 letter in terms of land and water resources that, unnoted and unattended, would risk being destroyed or damaged by highway construction.

The conservation group coalition's May 29 letter to GWNF points out that the SEA also claims the Refined Selected route (new four-lane Corridor H) complies with the GWNF Forest Plan, but it does not provide any analysis of how it meets management guidelines for GWNF Management Prescription Area 7B - Scenic Corridors, which Corridor H would cut through in the vicinity of the Tuscarora Trail. The comments of Allegheny Blue Ridge Alliance/WV Highlands Conservancy point out that the current 2014 GWNF Plan does not allow ad hoc creation of a brand-new highway corridor on Forest land without a plan change to formalize that land use.

Wardensville Drinking Water: See *Wardensville's Comprehensive Plan of 2018* listing as a high priority, "Protect Town sources of drinking water (wells, streams, and aquifers) from contamination." Recognizing that surface water currently can leak into the wells that are the town's water source, Wardensville has made plans to drill a deeper well into a different aquifer—but officials aren't sure if Corridor H could disrupt the new well. Page 42 of WVDOH's EA says, "Roadway construction will require the formation of a rock cut up to about 165 ft in depth through Anderson Ridge, which will result in disturbance to within 1,500 ft of the well. A five-span bridge is proposed crossing the floodplain of Waites Run, East of the well field. This bridge will be supported on piles driven to bedrock (abutments) and rock-socketed drilled shafts (piers). Abutment 1 will be approximately 1,400 ft from the new well."

West Virginia Rivers, an organization which has concern for clean drinking water around the state, questioned the lack of assurance as to whether the new well would protect Wardensville drinking water from Corridor H construction disruption. (see *WV Rivers Letter of Comment May 30, 2025*). "... the test well (TW-3) has not yet been converted to a production well due to technical difficulties associated with the initial drilling effort. Therefore, the SEA lacks sufficient data demonstrating that the new well will be an improvement from the former. Geological data from the wellbore drilling encountered multiple water-bearing strata, including the Marcellus shale layer above the targeted Oriskany sandstone, and the SEA assumes that these surficial layers will protect the deeper sandstone from degradation, but this assumption has not been fully tested. Moreover, the SEA acknowledges that "there could be unknown issues that will only be revealed after TW-3 has been put into production." We therefore recommend that the production well(s) be completed and evaluated before the SEA is approved."

The SEA describes several mitigation measures to protect the town water, including monitoring wells. However, a WVDOH official asked Wardensville Mayor Betsy Orndoff Sayers if the town was prepared to “lose all its water” as a result of construction digging and blasting. see *Town comment letter of Nov. 11, 2023*. The SEA on page 47-48 talks about WVDOH drilling a test well to find better water if the wells are disrupted by highway construction, but stops short of saying WVDOH would pay to drill a replacement well-- though Page ES-10 of the EA refers to replacing water supplies impacted by highway construction. The SEA fails to evaluate how much of Wardensville’s estimated daily 150,000 gallons from the spring might be vulnerable to Corridor H construction damage, or detail the extent of WVDOH’s designed mitigation. See WVDOH’s correspondence with the Town of Wardensville about the water— *Town comment of Nov. 11, 2023, WVDOH letters of March 12, 2024 and Town response of June 25, 2024*, which Stewards of the Potomac Highlands obtained from the Town via FOIA. We ask that these letters, plus the Town comment letter of June 1, 2025, *attached*, be made available to the public in a full EIS.

WV Rivers May 30 letter of comment also asks for more information on mitigation plans for private wells. WV Rivers commends WVDOH’s asserting in the EA that “the water supply will be replaced” if construction should “result in the contamination or loss of a water supply” but adds, “Significant questions remain: on what basis will this be determined, and by whom? Will the water supply be replaced through connection to a municipal line, or new well on-site? We understand that the Hardy County Public Service District is proposing new municipal water lines for portions of Trout Run 3 , but this change is not considered in the SEA. We also note that the SEA assumes an impact area of 600’ from the proposed road centerline, but this appears to be an arbitrary distance. Instead, we recommend including all residents in the Wardensville area under well water protections.”

New changes to the highway design lack any environmental or engineering analysis:

During the last three years of public meetings, WVDOH has made several changes to their Corridor H (presumably Final) design in the Wardensville area. Each change has been in response to public comments, but the process has not brought the public a clear map and explanation comparing the various options, as would be displayed in a full EIS.

First, through Wardensville WVDOH had planned to build the highway at a low elevation, to avoid it being viewed from sites in the town’s historic districts named in the Section 106 process. see *EA page 3*. But after the Town and others expressed concerns that this sunken road alignment would impact Wardensville’s designated Wellhead Protection Area, WVDOH announced they would raise the Corridor on piers in the lowlands and further elevate the alignment on Anderson’s Ridge, the source of Wardensville’s aquifer. See above

section on Wardensville Drinking Water. With the area's fractured sandstone/limestone geology, it is hard to predict whether construction at this higher elevation would avoid impacts to the water table—especially after the previous construction from Baker to Wardensville damaged several household wells and drained all the water out of Trout Pond, a natural pond originating from a sinkhole.

Wardensville's Mayor Orndoff Sayers Nov. 11, 2023 *letter of comment* shows she became frustrated with WVDOH's seeming lack of consideration of the highway's impacts on Wardensville. Wardensville is small—population just around 350 according to Data USA—but it's the nerve center of Eastern Hardy County, and small towns and countryside form the character of West Virginia's Potomac Highlands. The town's businesses, volunteer fire company, library and water system serve people far outside its limits, and the town's historic Main Street is the area's gateway into West Virginia from the east.

In another issue that led to revisions in design, WVDOH discovered an engineering flaw in its original plan for an exit on North Mountain east of Wardensville shown in the August 2022 public meeting handout. WVDOH announced at a *public meeting Sept. 21, 2023*—it now planned to eliminate the exit. WVDOH published announcements, before the April 2025 public hearing, that it planned to cut off Route 55 during construction of the four-lane east of Wardensville. (see *EA, page 100*). That would force residents on Route 55 east to backtrack west to Wardensville for up to five miles to get on the eastbound four-lane.

To answer this concern, in a poster displayed during the April 22, 2025 public hearing, in Baker at East Hardy High, WVDOH revealed a new map not included in the SEA: an auxiliary “temporary” road on North Mountain to admit the eastbound traffic. But WVDOH drew this new line on the map without specifying what earthmoving and resulting environmental impacts are involved in this extra road. An EIS would analyze the impacts of this change and perhaps help prevent safety and environmental errors ahead of any construction.

Tuscarora Trail Impacts and Section 4(f): Virginia Wilderness, Potomac Appalachian Trail Club and other outdoor recreation groups have raised concerns, both in comment letters to the FHWA and in a May 29, 2025 coalition letter to the U.S. Forest Service, about impacts to the Tuscarora Trail which would encounter the proposed four-lane Corridor H atop Great North Mountain. The Tuscarora Trail is entirely omitted from the SEA as either an impacted recreational resource or, more importantly, a resource protected by Section 4(f) of the Department of Transportation Act.

The Tuscarora Trail (FKA Big Blue Trail) now crosses Route 55 on top of Great North Mountain. WVDOH has been aware of the trail since the Alignment EIS was issued in 1994; its P. III-182 and in Table III-30 in section K under "Visual Assessment" noted that the trail is located in the George Washington National Forest (GWNF) within the project area and that its "visual quality is considered to be distinctive due to undisturbed setting and scenic vistas." On Page III-159 the Alignment EIS showed that hiking and cross country skiing were primary activities on the trail. On page III-169-170, the Tuscarora Trail was said to be the "only recreational resource in GWNF to be affected by the (four-lane) Build alternative" of Corridor H—and that the effect would be "major."

However, the Alignment EIS did not classify the Tuscarora/Big Blue as a 4f resource, so no evaluation of the trail's significance or determination of Corridor H effects was performed under Section 4F. The current SEA page 98, without mentioning the trail, globally asserts that "As confirmed through coordination during the ASDEIS evaluations, GWNF resources in the project area are not considered Section 4(f) properties" However, The Big Blue/Tuscarora was not identified as Section 4(f) resource in the inter-agency consulting meetings conducted in 1992 for the 1994 Alignment EIS, P. IV-2, 577-78 .

Stewards believes that the Tuscarora Trail must be classified as a 4f resource. The impacts on the trail therefore must be evaluated in a separate Section 4(f) document, or as part of a supplemental EIS. 23 C.F.R. § 774.9(c). Prudent and feasible alternatives must be evaluated under Section 4(f)'s stringent standard, and including the alternative of undertaking road improvements that would avoid any use of the GWNF and the Tuscarora Trail, including where the trail crosses Route 55.

The FHWA's Section 4(f) policy paper provides that:

"Section 4(f) would apply to a publicly owned, shared use path or similar facility (or portion thereof) designated or functioning primarily for recreation, unless the official(s) with jurisdiction determines that it is not significant for such purpose. During early consultation, it should be determined whether or not a management plan exists that addresses the primary purpose of the facility in question."

Section 4(f) Policy Paper, Question 5A

<https://www.environment.fhwa.dot.gov/legislation/section4f/4fpolicy.aspx>

The Tuscarora Trail clearly functions primarily for recreational purposes. From Tuscarora's own website <https://www.hikethetuscarora.org/> and previous EIS documentation, it appears the trail is primarily if not exclusively recreational in use. It has grown both in use and importance since the Corridor H SDEIS of the 1990s. It is not only a parallel, more rugged north-south alternative for hikers west of the original Appalachian trail; it has

become part of the Great Eastern Trail network created in the early 2000s. Here is the history, summarized from the GET “Plans and bylaws” at
<https://www.grEAtEAsterntail.net/plans-bylaws/> (Exhibit ---- pdf)

After his legendary hike in 1948, Earl Shaffer, the first Appalachian Trail (AT) thru-hiker, came up with an idea for a new, 1800 mile long parallel trail in the western Appalachians linking New York and Alabama as the EAstern Appalachian Trail grew more popular and crowded over the years. In 2000 Lloyd MacAskill of the Potomac Appalachian Trail Club (PATC), which maintains the Tuscarora (known then as the Big Blue) Trail, promoted the western trail idea in the Appalachian Trailway News suggesting several existing trails could be linked for this purpose. PATC joined in 2003 with Southeast Foot Trails Coalition (SEFTC), newly formed in Chattanooga, to pursue this, and American Hiking Society (AHS) and the National Park Service/Rivers, Trails and Conservation Assistance program, which had partnered to form SEFTC, offered to assist. in the early organizational effort. By 2007, eleven trail groups, some of them from SEFTC, formed the Great Eastern Trail Association, and Big Blue was an integral connector in GETA, joining with the famous Towpath trail in Washington DC. (PATC signed onto the current letter to GWNF officials from 14 environmental and history groups, attached). *Virginia Wilderness Committee’s comment letter of May 27, 2025*

The Great Eastern Trail network’s use, according to its website, was set up primarily for hiking, most support coming from hiking trail clubs. REI, the company which sells outdoor equipment, is a partner. Parts of the pre-existing trails continue to be open to equestrians and mountain bikers, according to decisions by the relevant land managers, but no motorized segments are incorporated, except when road shoulders or jeep trails must be used. The objective is to get the trail off roads entirely. The width of GETA is three feet—one foot narrower than the Appalachian Trail. A system of mostly-volunteers maintain the trails and shelters.

More history: At one point Tuscarora’s route almost became the main Appalachian trail:
<https://www.kta-hike.org/tuscarora-trail.html> Because the Tuscarora Trail is within the GWNF, the FHWA appears to assume that it is a multiple use resource that does not function “primarily” for recreational purposes. 23 C.F.R. 774.11(d). However, this is clearly incorrect. Unlike other trails in the GWNF, the Tuscarora Trail is not managed for multiple purposes, Further the GWNF plan specifically states that the Appalachian Trail is designated for hikers only, i.e. a recreational use. GWNF Plan, Ch. 4 – DESIGN CRITERIA GEORGE WASHINGTON NATIONAL FOREST p 4-42 thru 4-47 (“4A-009 Motorized, horse, pack stock, and bicycle use on the Appalachian Trail are prohibited. Exceptions include where the Appalachian Trail crosses or is located on open Forest Service system roads”). J

7C. The Tuscarora Trail is a spur of the Appalachian Trail and is managed by PATC for recreational purposes. <https://www.hikethetuscarora.org/patc>

As the coalition of environmental groups pointed out in its *letter to the GWNF of May 29, 2025*, the Tuscarora Trail is within “a designated Scenic Corridor (Management Prescription 7B) on Great North Mountain. The Forest Plan’s direction for 7B emphasizes maintaining high scenic quality, abundant recreational opportunities, and wildlife habitat connectivity in these areas. Human alterations must remain “subordinate” to the natural landscape.” *Coalition May 29 letter attached*: The (Corridor H) highway would permanently mar this scenic area, including the Tuscarora Trail. *Id.*

Since it appears that the Tuscarora trail functions primarily as a trail/recreational resource, Section 4(f) should apply. Therefore we request Section a 4F review of the trail be included in a new SDEIS. Along with Virginia Wilderness Committee in their May 27 comment letter (attached) and the conservation group coalition’s May 29 letter to GWNF, to which Stewards of the Potomac Highlands signed on, we urge that the EIS address the safety, permanency, and adequacy of the parking area near the Tuscarora Trail mapped in the EA, page 34, as almost a mile west of the trail along Route 55. We also request a Section 106 analysis of the negative impact of the towering industrial presence of Corridor H on those who seek a wild and wonderful hiking experience in this scenic section of the GW, and how WVDOH plans to mitigate it. The Section 4(f) Statement must analyze how the proposed Save Wardensville alternative--spot improvements to existing Route 55-- can improve safety and access for both vehicle traffic and foot /bike/horseback recreational use around the trailhead. Corridor K improvements in Tennessee and North Carolina, including an interface with the Appalachian Trail, can provide a model for this:

<https://www.ncdot.gov/projects/corridor-k/Pages/default.aspx> and
<https://www.tn.gov/tdot/projects/region-2/us-64-corridor-k.html>

Bypassing Main Street, Hurting Tourist Economy: Page 21 of the SEA acknowledges the increase in Wardensville’s businesses and population since the Amended ROD was issued in 2003. The SEA also acknowledges that “The reduction of traffic along existing WV 55 through downtown may mean that fewer people will stop on impulse, which could reduce tourism and commerce.” SEA, at 35. With Rt. 55 now terminating at cul-de-sac, *Id.*, no amount of directional signage will mitigate the profound effects on the Wardensville business district and economy. Wardensville’s downtown historic district will ultimately suffer from the resulting loss of economic vitality and disinvestment.

Reviews of literature show mixed impacts of four-lane highways built to bypass small towns—for example this Kentucky study <https://transportation.ky.gov/Congestion-Toolbox/Pages/Effects-Of-Bypasses-On-Communities.aspxid>.

Mostly these impacts have been measured in total net dollars of income—gas stations and chain stores gained on the outskirts of town vs. Main Street and interior businesses that lose traffic and income. The studies show “winners” and “losers” instead of the whole local economy being a winner.

A 2002 study by Conaway B. Haskins III at the University of North Carolina concludes, “Economic development advocates and officials should also take caution in continuing to advance the notion that more highways will automatically lead to more development. It appears that highways contribute to accessibility in some measure, and therefore, in tandem with other factors, like labor cost and human capital, help foster rural growth and development. However, pushing for highway-specific infrastructure development plans is not recommended.” <https://transportation.ky.gov/Congestion-Toolbox/Documents/NC%20Economic%20Development%20Roads.pdf>

Perhaps informative would be a study of impact on historic Main Street districts that have been rehabbed, put into service and then bypassed. We propose that a bypass that would draw tourist traffic away from small historic town should be considered, at the very least, a “constructive use” negative impact to a 4 F historic resource—and Wardensville has two strong designated downtown historic districts plus a number of separate historic houses. The town’s buildings and streets are prized as representing well over a century of local history, and the charming but unpretentious late 19th century architecture attracts tourists and second-home buyers. Every home bulldozed by a highway, historic or modern, puts a dent in the town’s tax base. We wonder how one can quantify the lost years of toil, time, heart, and tears from maintaining homes and homegrown businesses and relationships among neighbors.

The Wardensville mayor, Betsy Orndoff-Sayers, also discusses the economic threat of bypassed business in correspondence with WVDOH in *comments of Nov. 11, 2023 and letters in 2024*, and in her June 1, 2025 comment on the SEA proposes a more direct exit to Main Street near but not on Carpenters Avenue.

Page 53 of the SEA proposes to mitigate the loss of Wardensville business, and damaged views from the historic district, by putting up signs to alert bypassing traffic to the town’s existence, see *also SEA page 73*. It is highly unlikely that directional signage will mitigate this impact. Instead, the better solution is to improve access by improving safety in spots on Route 55 rather than build the four-lane bypass. We urge that a full supplemental EIS

evaluate the effect of a four-lane bypass on Wardensville's economy and compare it to the no build and spot-improvement alternatives.

It is abundantly clear that the low traffic volumes on local roads do not justify the construction of a four-lane highway. The request for study of such an alternative is endorsed by two leading businessmen in Wardensville, Don Hitchcock and Paul Yandura, who spearheaded development of the Lost River Trading Post and Realty, Farms Works Wonders, Dakota Glass, Macks Bingo, and the Lewis Foundation which helped revitalize the town. <https://gardenandgun.com/articles/the-little-west-virginia-farm-with-big-drEams/> Hitchcock and Yandura wrote in their May 30, 2025 Corridor H Letter of comment, "For years, Lost River Trading Post has served as a key destination for residents and visitors alike, offering locally crafted goods, outdoor supplies, and unique regional products that celebrate the natural beauty and heritage of the Lost River Valley and surrounding areas. Our business not only supports the local economy but also helps to foster a sense of community and tourism in Wardensville. It is with great concern that I address the West Virginia Division of Highways' currently proposed route for the new highway project. After careful review, this plan will have severe and lasting negative impacts on our town, our environment, and the local economy..."

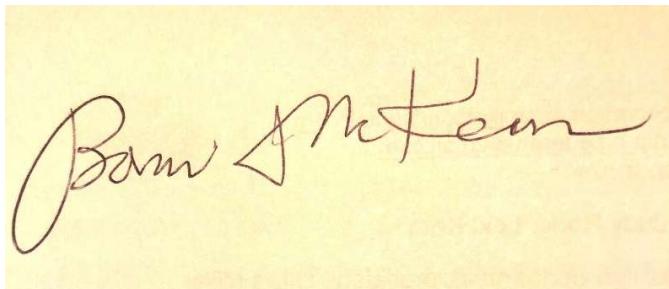
"In contrast, we strongly urge the Division of Highways to consider the Save Wardensville Alternative, which proposes:

- Simple safety improvements to the existing Route 55 that maintain traffic flow through Wardensville's downtown, supporting the survival and vitality of local businesses.
- Routing that circumvents the Wellhead Protection Area and avoids extensive heavy construction, thereby preserving our critical water supply.
- Using the existing road infrastructure, which avoids displacing residents, protects the George Washington National Forest, preserves the Tuscarora Trail, and prevents further damage to environmentally sensitive streams.
- A connection to the existing two-lane Route 55 that respects Virginia's position on Corridor H while enhancing road safety and community well-being." See *Lost River Trading Post letter of comment May 30, 2025*.

Conclusion: Whether it's a 100- 150-year-old historic district, a rugged mountain trail in the National Forest, or a sensitive spring, Wardensville and Great North Mountain is a special area prized by both locals and tourists who work, live and visit in the Cacapon River and Shenandoah watersheds. It is hard to ram a four-lane highway through this area

without serious impacts to the very resources which attract and keep people here. A new supplemental EIS is needed that fully evaluates the nature of our surroundings and our community, and takes a good look at improvements to the existing Route 55 that could truly serve WVDOH's stated Purpose and Need and "improve the quality of life in our region."

Sincerely yours,

A handwritten signature in brown ink on a yellow background. The signature reads "Bonni McKeown".

Bonni McKeown, president, Stewards of the Potomac Highlands

ATTACHMENT LIST:

Alliance for Shenandoah Valley Nov. 2023 comment letter to WVDOH

Belle Grove May 2, 2025 comment letter to WVDOH

Environmental coalition letter to the GW Forest May 29 2025

Allegheny-Blue Ridge Alliance and WV Highlands Conservancy Comment June 1, 2025

Friends of N.Fork of Shenandoah River comment letter May 30, 2025

VA Wilderness Committee comment letter May 27, 2025

Strasburg VA mayor comment letter and Council resolution May 28, 2025

WV Rivers comment letter May 30, 2025

WV Rivers comments Dec. 12, 2022

Wardensville's Comprehensive Plan of 2018

Wardensville Town comment letter of Nov. 11, 2023, WVDOH letters of March 12, 2024 and Town response of June 25, 2024; and comment letter of June 1, 2025

GWNF 2014 Forest Plan, see recreation section

University of N. Carolina, 2002 economic development study by Conaway B. Haskins III
Hitchcock and Yandura, Lost River Trading Post Corridor H Letter of comment May 30, 2025

COPY LIST:

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US Senator Jim Justice, WV

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US Rep. Riley Moore, WV

US Senator Tim Kaine, VA

US Senator Mark Warner, VA

U.S. Rep. Ben Cline, VA

VA State Senator Timmy French

VA Delegate Todd Gilbert

WV State Senator Randy Smith

WV Delegate Bryan Ward

Stephen T. Rumbaugh, WVDOT Secretary

WV Commissioner's Ofc. of Economic Development: Perry Keller

US Forest Service, GWNF Lee Ranger District: Joby Timm, John Barger, Mary Yonce, Gwendolyn Mason, Ashley Sears

WVDOH District 5: Lee J. Thorne

US DOT Secy. Sean Duffy

US Fish & Wildlife service, WV Ecological Service Field Ofc., Elkins WV

US Army Corps of Engineers, Huntington WV Brian Bridgewater

WV Dept. of Environmental Protection: Katheryn E. Emery Fultineer, Environmental advocate Edward Maguire

EPA Region III: Jamie Davis, Adam Ortiz, epa.gov comment form

Mayor of Wardensville, Betsy Orndoff Sayers

FHWA, USDOT Gloria Shepherd, Executive Director,

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