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Comments: POTOMAC APPALACHIAN TRAIL CLUB  
Comments on  
GW-JNF Proposed  
VDOT - Route 33 Rawley Pike Road Improvement Project

attn: MARY YONCE,  
North River and Lee District Ranger

The Potomac Appalachian Trail Club (PATC) appreciates this opportunity to comment on the "VDOT - Route 33 Rawley Pike Road Improvement" project now open for public review and comment.

The PATC recognizes the need to increase the safety of the public in its use of US Route 33, and thus supports the VDOT's goal to rework this roadway to serve this purpose, and we generally support GW-JNF proposed action to authorize this work. While generally supporting the GW-JNF and VDOT in this action, at the same time PATC agrees with others that the GW-JNF approval of this project should follow that outlined for an Environmental Assessment and Decision action, and compliments the GW-JNF for its appropriate reclassification of the extent of environmental review and assessment required for this action.

The PATC has a long standing interest regarding the protection and use of the many resources found on and in the vicinity of Shenandoah Mountain. For more than a decade we have been a strong proponent of the development and creation of the current Shenandoah Mountain National Scenic Area (SMNSA) proposal. Moreover, our members intensively use and maintain the trails in the GW-JNF's North River District.

This project traces the northern boundary of the proposed SMNSA, and thus will be visible from portions of the interior of the SMNSA. To the extent feasible, plans should be developed to reduce the visual scar that could potentially remain for many decades following the completion of this project. This work will take place in steep, difficult, mountainous terrain, and it must be recognized that work to remove and relocate substantial quantities of rock and soil will have very noticeable effects on the natural contours of the mountainside. To the extent that these can be minimized and otherwise mitigated, the VDOT permit should require it to do so. Re-vegetation with native plants should be a minimum requirement. The environmental assessment should outline alternative technological means to accomplish the desired outcome, and estimate the associated economic and environmental tradeoffs of each alternative.

The Notice states that the "existing edge of pavement at the drop-off would be maintained." It is suggested that this requirement may not be ideal for this complex terrain. To the extent that it might reduce the amount of rock and soil to be removed on the upgrade slope, the use in some instances of rock-faced supporting walls to expand the outside extent of the roadway might be considered, such as, for example, these were used repeatedly in the construction of Skyline Drive and the Blue Ridge Parkway.

The Notice also states that the "project would be designed in accordance with VA Stormwater regulations." While we are not completely familiar with these regulations as applied to this type of project, it is strongly suggested that the GW-JNF should impose the more stringent and applicable of its own regulations and the VDOT regulations, on a situation by situation basis, to protect this mountainside from preventable erosion, and to protect the water quality of all water courses that feed into the Skidmore Fork. This important issue needs thorough study and assessment of all feasible means to protect water quality, and to reduce the risk of landslides or accelerated erosion as a result of this major land disturbance.

The Notice is silent on the quantity of rock and soil to be removed or relocated by this proposed project, and on the final disposition of this material. The management of this material is an important consideration that must be addressed in an environmental assessment. To the extent that the volume of this produced waste can be reduced by developing a design for the re-engineered roadbed that achieves this objective, the adverse impacts of managing such waste material could be reduced.

We note an apparent discrepancy between the statement in the Notice that this project would "provide twenty-two feet of paved roadway" and the statement on the relevant VDOT page that this project would "provide two 12-foot lanes." We trust that such project details will be accurately described in the environmental assessment document to be produced in the course of study and project design. PATC looks forward to reviewing the result of such environmental assessment to be distributed in the future for public review and comment.

In summary, PATC strongly supports the GW-JNF in its revised decision to treat this project as an Environmental Assessment and Decision action. Additionally, the PATC is fully supportive of efforts to increase public safety on this section of US 33, and trusts that the above comments will aid the GW-JNF and VDOT in developing a final project design that will strike an optimum balance between this objective and protecting the natural environment in this part of the North River District.

Submitted by:  
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PATC Conservation