

# Documents and information pertaining to the Experimental Mine

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To suzandkev@aol.com

Highlands Voice Article.docx (19 KB)

2 NIOSH Letter Writing Resourc...docx (29 KB)

Mr. Elvin,

I am writing to make you aware of the Experimental Mine proposed by the CDC/NIOSH to be built in the Karst limestone that is the source of the Elk and Tygart Valley Rivers in Mace/Mingo Flats area. The site borders Snowshoe and the Monongahela National Forest. If built, it will be a full-scale experimental mine 500 feet deep in Karst limestone. It poses serious threats to our "Forever Wild" region. One of the many significant threats to local community water and the Tygart Valley River and Elk River is an Above Ground Fire Suppression Experimental facility, using fire foam and other chemicals, to be built as part of this complex. The announcement of approval or disapproval of the Draft Environmental Impact Statement (DEIS) is scheduled for mid-summer 2021.

I request that you review and forward this information to members of the Rimfire Homeowners Association.

Snowshoe, Alterra, and the Pocahontas County Commission wrote strong letters of opposition to our elected representatives in 2020. Senator Machin met privately with Snowshoe in late 2020 and told Snowshoe he needed to hear from more members of the community about this issue. There was a subsequent Zoom meeting in early 2021 between Senator Manchin's team, the CDC, Snowshoe, and our community group, Eight Rivers Council, represented by me. It was mainly an informational meeting where we were able to ask questions about the project.

Governor Jim Justice, in his State of the State address in February, announced the great success of the tourism industry in West Virginia and elevated Chelsea Ruby, then Tourism Commissioner, to West Virginia's first Secretary of Tourism, a cabinet position. Governor Justice believes that tourism will attract new residents and businesses to the state. Our group, Eight Rivers, believes Governor Justice needs to hear from residents and second homeowners already invested in the thriving tourism community in Pocahontas County. Governor Justice has the power to direct the WV DEP to search for a better location for this facility. Lake Lynn, the original experimental mine, was built in an abandoned limestone mine in a remote location surrounded by corporate timber holdings.

I attached two files for your review. There is an article about the facility published in the Highland Voice and a letter writing resource packet we prepared to help citizens write personal letters to our elected representatives to express opposition to building this full scale industrial mine facility in the pristine and fragile Karst that is the source of the headwaters of two rivers and the source of the drinking water for the many nearby homes. We intend the resource packet to help people formulate their own letters. The letters do not need to be technical. Just a statement of who you are and what your ties are to the area and why you think this is the wrong location for this facility.

Our group, Eight Rivers Council, is hosting a series of letter writing "parties" in the community this month. We will be at the Linwood library May 25 at 5:30 PM – 8:30 PM, at The Brewery on May 28 and 29, time TBA, and other events in the community TBA, including Elk Springs and hopefully Valley Head Library. We request that you inform your homeowners of the issue and forward the information to them so they can write letters if they wish, to support the effort to keep the Snowshoe region "Forever Wild". Please stress it is important to write the letters now, before the Approval/Disapproval of the DEIS is announced sometime in mid-summer 2021.

Our family has lived in Mingo/Mace community since 1987. We are the owner/operators of George Construction Inc, home of The Condo Doctors here at Snowshoe, also since 1987. I am available to answer any questions you may have.

Thank you very much. Your help is deeply appreciated.

Jeanne Bell  
Eight Rivers Council  
PO Box 30  
Snowshoe, WV 26209  
304-572-4553 (work)  
304-651-4554 (cell)

The article listed in the above email is included below:

## **Final EIS Announcement Looms for Proposed Experimental Mine Facility in the Mace/Mingo Flats Community in Pocahontas County and Randolph County**

**By Jeanne Bell**

The final Environmental Impact Statement is scheduled for release mid-summer 2021 for the CDC project to replace the abandoned Lake Lynn Experimental Mine with a new underground facility to be built in Mace WV on a 461-acre property located on the border of Randolph and Pocahontas County. The experimental mine is designed to be built in limestone but to replicate tunnels and galleries in a working coal mine.

The property is located at the source of the headwaters of both the Tygart Valley River and the Elk River. The site is adjacent to Snowshoe Mountain Resort and the Monongahela National Forest. The geology is Karst, and the adjacent community of primary and second homes relies on groundwater wells and springs. No public water is available for these homes.

The Tygart Valley River and the Elk River are both trout reproductive waters in this region. The Tygart Valley River forms on the adjacent property upstream from the proposed site, sinks underground and rises again, then flows across the property the CDC proposes to develop. Native brook trout reproduce in these waters.

Tributaries in the Headwaters of the Elk rise and sink and are well known for subterranean flow through a series of caves and underground streams that join the Elk River, which itself sinks and flows underground along Dry Branch Road, until it rises again at Elk Springs. The Elk is known for trout waters and is a popular fishing destination.

In 1976 the Northern Pocahontas County West Virginia Speleological Survey Bulletin published results for a dye trace test conducted in this part of the Elk River Watershed. The dye was introduced at a point called Beale's Insurgence only 1.65 miles from the proposed underground facility. The dye traveled South to the Big Springs fork of the Elk in Slatyfork in Pocahontas County, and Northwest approximately 10 miles to the

reemergence of the Elk River at Elk Springs, in Randolph County. Dye was also introduced in Simmons Mingo Cave where the Dry Fork and Douglas Fork of the Elk River join Simmons Mingo stream and flow underground to My Cave and join the Elk River where it sinks as a waterfall in the Black Hole. Simmons Mingo cave is in the Tygart Valley River Watershed. The dye trace study confirmed an underground connection of the Elk and Tygart watersheds. This is the only known subterranean connection of two major river watersheds in West Virginia.

The proposed project would tunnel 500 feet down through the Greenbrier limestone formation and would install a 164000 GSF (Gross Square foot) subterranean facility under the border between Randolph and Pocahontas County. Although the entire facility would be within the Tygart Valley River Watershed, it would only be about 1300 feet from the Elk River Watershed Boundary near the entrance to Dry Branch road in Mace. As demonstrated by the Simmons Mingo connection, watersheds are surface demarcations, and do not necessarily correspond with the underground flow of water in Karst.

### **The facility poses multiple risks for groundwater contamination.**

Underground fire control is a major area of research in the experimental mine. The project includes an above ground fire suppression experimental facility, located on Karst. Fire foam and other fire-retardant chemical research would not be limited to the above ground facility. Fire foam was tested underground as part of the research conducted at Lake Lynn. Fire foam is well documented to contaminate water in localities surrounding fire fighting training and testing facilities, as it did in Martinsburg WV, where the city water supply was contaminated with PFA's. PFA's are known as a "forever chemical". They do not degrade in the environment, nor do they break down in the body.

Potential groundwater contaminants include nitrates from blasting and all the chemicals associated with diesel and oil, products of combustion of coal dust, PFA's and other chemicals from fire foam, and any unknown chemicals used in the underground experiments.

The facility would be dewatered by continuous pumping during construction and during operation. Water entering the facility would be pumped to the surface where it would pass through an oil/water separator, enter a series of two or three lined settling ponds, where it would be "cleaned" of contaminants, and discharged to the surface. The discharged water would flow through the Karst into the groundwater.

Continuous pumping of groundwater risks altering the groundwater flow, potentially dewatering wells and springs, and risks change in water quality due to recharge source change.

### **Construction will disrupt commuting and tourism travel for four years.**

State Route 219 travels N/S through Randolph and Pocahontas Counties and is a major route taken by guests travelling to Snowshoe and Pocahontas County from points North and East, including DC and Northern VA. This traffic will increase when Corridor H is finished.

The entrance to the facility would be located on Route 219, on the north side of Valley Mountain in Randolph County, where the road winds its way up and down the mountain at a 7% grade. Construction is estimated to take four years, and this section of road would be occluded by heavy truck traffic, especially at the beginning of the job. The Draft Environmental Impact Statement states that 116 truckloads of excavated material would leave the site **each day** for 4 months. This equates to 232 trucks entering and leaving the site daily. For the remaining 3.75 years of construction, an estimated 16 trucks per day (32 trips) would haul excavated limestone to a local quarry. These statistics account for excavation debris removal, and do not include heavy equipment deliveries or materials deliveries. No estimate was provided for these additional trucks entering and leaving the site.

Lake Lynn, the site of the former Experimental Mine located in Pennsylvania just across the West Virginia border, was built in an abandoned limestone mine, surrounded by unoccupied land owned by a timber company, with only one house nearby, more than a half mile away.

The proposed site is within the source of the headwaters of two rivers, adjacent to a community dependent on groundwater in Karst, adjacent to an internationally recognized four season resort, with entry located on a steep section of busy mountain road.

A group of community residents organized with Eight Rivers Council, Snowshoe Mountain Resort and their parent company Alterra, and the Pocahontas County Commission have all contacted elected representatives including our Senators, our Governor, and our house delegates to express objection to this proposed project and seeking to move the proposed location for this Experimental Mine. While all acknowledge the importance of Mine Safety research, this location is a poor fit for an experimental mine. A more remote location in an area already impacted by mining must exist somewhere in West Virginia.

Senator Manchin indicated in a meeting with Snowshoe that he wants the facility located in West Virginia and he needs to hear from more residents regarding the current proposed site.

## **Resources**

To learn more about the Elk Headwaters Watershed, search Elk Headwaters Comprehensive Watershed Protection Plan published 2011, on the WV DEP website.

To learn about fire foam and other experiments conducted at the former Lake Lynn facility, visit <https://www.cdc.gov/niosh/mining/UserFiles/works/pdfs/rmfst.pdf>,

To read the DEIS published in the Federal Register go to:

Docket No. CDC-2018-0057

Draft Environmental Impact Statement Centers for Disease Control and Prevention in cooperation with U.S. General Services Administration Acquisition of Site for Development of an Underground Safety Research Program Facility for National Institute for Occupational Safety & Health in Mace, West Virginia

Jeanne Bell has lived at the headwaters of the Elk and Tygart Valley Rivers since 1987. She and her husband, George, are business owners at Snowshoe. George was President of the Elk Headwaters Watershed Association, which produced the Comprehensive Watershed Protection Plan. Their daughter, Ellie, is a board member of the Highland Conservancy.

Another article that was mentioned in the email above with information on writing a letter is included below:

**National Institute for Occupational Safety and Health (NIOSH)  
Proposed Underground Research Facility in Mace  
Letter Writing Resources**

If you are concerned about the potential impact of the massive, complex NIOSH underground mine construction and research project proposed for our community, we urge you to communicate with those who will soon be making decisions on whether this project will proceed.

None of us oppose Coal Mine safety research. This is simply an inappropriate site for this facility. Our region is un-impacted by mining and the site is located at the source of the headwaters of two major rivers. There are other, more appropriate sites in West Virginia that are better suited for this facility, such as an abandoned limestone mine. The Lake Lynn Experimental Mine, which this project replaces, was built in an abandoned Limestone mine.

Snowshoe and parent company, Alterra have written strong letters of opposition to this project, as has the Pocahontas County Commission. Senator Joe Manchin, in a private meeting with Snowshoe about this project, specifically requested letters from concerned residents. He wants to hear from more area residents about why the NIOSH project is not appropriate for our community. It is critical that he hears from us before the Draft Environmental Impact Statement is complete. It is scheduled for release mid-summer.

Please write to Senator Joe Manchin. Please write to Governor Justice as well. Just change the address and name and send the same letter to Governor Jim Justice.

So, please take a few moments to review the attached reference material and then join us in writing to those who have the power to redirect this project to a more appropriate location.

We attached contact information for Senator Manchin and Jim Justice.

Your letter does not need to be technical or formal.

Simply state what your ties are to our region, whether you are a property owner or a person who loves to vacation here, long time resident or new to the area. Clearly state that you oppose building the facility here and tell them why you oppose it. Feel free to pull information from any of the attached documents.

Hand-written notes are fine.

Thank you! Your time and your effort are deeply important and appreciated.

## Contact Information for our Representatives

### **Senator Joe Manchin**

900 Pennsylvania Ave  
Suite 629  
Charleston WV 25302  
304-342-5855

### **Governor Jim Justice**

Office of the Governor  
State Capitol, 1900 Kanawha Blvd. E  
Charleston, WV 25305  
304-558-2000 or 1-888-438-2731

## Resources

**To learn more about the Elk Headwaters Watershed**, search Elk Headwaters Comprehensive Watershed Protection Plan published 2011, on the WV DEP website.

**To learn about fire foam and other experiments** conducted at the former Lake Lynn facility,  
<https://www.cdc.gov/niosh/mining/UserFiles/works/pdfs/rmfst.pdf>,

**To read the Draft Environmental Impact Statement (DEIS)** go to:  
Federal Register  
Docket No. CDC-2018-0057  
Draft Environmental Impact Statement Centers for Disease Control and Prevention in cooperation with U.S. General Services Administration

Acquisition of Site for Development of an Underground Safety Research Program Facility for National Institute for Occupational Safety & Health in Mace, West Virginia

**BULLET POINTS**

**REASONS NIOSH PROJECT BELONGS IN A DIFFERENT LOCATION**

**1. AREA IS UNIMPACTED BY MINING**

Pocahontas and southern Randolph Counties are unimpacted by mining. This facility is a full-scale deep mine with all the risks to groundwater associated with any deep mine.

**2. TOURISM RELIANT COUNTY**

The facility will be located adjacent to Snowshoe and Monongahela National Forest in a county that relies on a tourism economy based on outdoor recreation. FOREVER WILD is Snowshoe's slogan. Pocahontas County is known as the Birthplace of Rivers. This facility has a heavy impact on two of those rivers.

**3. RISK OF FIRE FOAM CONTAMINATION IN GROUNDWATER**

An Above Ground Fire Suppression Experimental Facility will be located on the site. It will be built on Karst, which provides a conduit for contaminants to enter groundwater unfiltered by soil, through cracks, fissures and caves located within the limestone. Fire Foam will be used at the above ground facility as well as in the underground facility. Fire Foam contains PFA's, a dangerous chemical that accumulates in the environment and the body and never degrades or breaks down. It is called a "forever chemical" and is well known for contaminating water supplies in communities adjacent to Fire Suppression training facilities like the National Guard training facility in Martinsburg WV.

**4. THREATENS GROUNDWATER SUPPLY FOR ADJACENT COMMUNITIES**

The location for this experimental deep mine is upstream from or adjacent to the communities of Mace, Upper Dry Branch road, Mingo Flats road, Douglas Fork Road, Sunset Mountain Village, and Woods Run. These communities depend on wells and springs for their potable water supply. The blasting and tunnelling required to build this 164000 GSF (gross sq foot) facility 500 feet underground, and the constant pumping to the surface of the groundwater flowing into the facility during both construction and during operation, risks changes to the groundwater flow, potentially dewatering wells and springs, and contamination by diesel and oil-based fluids, chemicals used in fire suppression, nitrates from blasting and any unknown chemicals used in the experiments.

**5. LOCATED AT SOURCE OF TWO RIVERS**



The facility will be built within the limestone formation *at the source of the headwaters of the Tygart Valley River and the Elk River*. Dye trace studies completed in 1976 document an underground connection of the waters in the Elk and Tygart Valley River headwater watersheds. *This is the only underground connection of the watersheds of two major rivers known to exist in West Virginia*. Potential for chemical contamination exists for both rivers. There is potential for a change in groundwater flow that may affect the quantity of water flowing into one or both rivers.

## **6. TRAFFIC**

The entrance to this facility will be located on Route 219, on a 7% grade on the north side of the Pocahontas/Randolph County line. The construction of this facility will take at least four years. The truck traffic created by construction of this deep mine will create a major traffic obstacle between Snowshoe and Elkins, disrupting local commuting for employment and goods and services, as well as the route travelled to Snowshoe Mountain Resort by tourists from the Baltimore, DC and Northern VA area. The truck traffic removing excavated materials from the site will equal 116 dump truck loads PER DAY for a period of 4 months (at least) and then 16 dump trucks PER DAY hauling excavated limestone off site. Double those numbers for the total trips to and from the facility. These numbers DO NOT INCLUDE machinery or materials delivery to and from the site.

## **7. JOBS**

This project is estimated to produce only 12 jobs. Most of the jobs created will be for PhD Mining Engineers and PhD Scientists who will come from out of county and even out of state.

## **8. LIGHT POLLUTION**

There was no mention of light pollution in the Draft Environmental Impact Statement. However, our area enjoys dark skies with superior night sky views. A project of this magnitude will include industrial lighting. It is unclear how much industrial lighting will be included but it will be part of our new realty if this project is built.

## **9. NOISE POLLUTION**

During construction, estimated to last four years, noise pollution will change the enjoyment of living in our remote and quiet neighborhood. Industrial noise levels from construction will be present from 7am-7pm Monday – Saturday. The closest homes to the site will experience sound levels between 47 and 68 dBA from the operation of heavy equipment, and air blast noise from above ground blasting to create the mine.

## **10. SMOKE PLUME**

The experimental above ground fire suppression facility will be used to test fire suppression products on things like mine belt fires, (this example was used in the DEIS). Burning a mine belt will create a dense black smoke plume. The smoke plume will be visible and odiferous across a wide area. The plume and odor will travel down wind from the site and potentially be visible at Snowshoe.

### **Sample Letter Introductions**

**Letters should be personal and reflect who you are and why you are concerned about NIOSH project impacts in our community.**

**Examples of introductions others have shared include:**

Dear Senator Manchin,

I am writing to you because I oppose the NIOSH Experimental Mine proposed for Mace WV in Pocahontas County. I live in (place of residence)\_and I travel here often to fish in the Elk River. The unique geology of the Headwaters of the Elk River includes an extensive system of caves and underground flow, eventually re-emerging at Elk Springs Resort. This clean and dramatic watershed is one of my favorite places. I love it so much I plan to retire here. The NIOSH project threatens this unspoiled river and my retirement plans . . . .

Dear Senator Manchin,

I am from (residence), and I own a second home near Snowshoe. I oppose the NIOSH experimental mine proposed for Mace WV. We bought our home at (local area) as a refuge from the noise, traffic, and pollution of (Primary Residence location) We love hiking, biking, and fishing right in the neighborhood. It is a short drive to Snowshoe for skiing in winter, and wonderful mountain bike trails and a lake in the summer. It is a vacationing mecca, with the nearby Monongahela National Forest, the pristine Elk and upper Tygart rivers, and even choices for dining at both Snowshoe and Elk Springs Resort. The Experimental Mine proposed for Mace will change this beautiful place forever. The truck traffic will make it difficult to travel over the mountain to Pocahontas County. We are downstream from the site and our wells are drilled through Karst, so the project threatens our clean water supply....

Dear Senator Manchin,

I am from Randolph County WV and I work at Snowshoe. I oppose this project. I live in (Elkins) and my commute to work will be almost impossible during the construction phase of this project due to the very heavy truck traffic on Rt 219. I am also very concerned that this project will contaminate the Tygart Valley River with chemicals from spilled

diesel, blasting residue, and other chemicals used on the site. I live downstream and this may affect my drinking water. The Tygart Valley River is a source of drinking water for the city of Elkins. I grew up here and have fished in the upper Tygart Valley River all my life.

Dear Senator Manchin,

I built a home and retired at Sunset Mountain Village in Mace WV because of the incredible views, clean air and water and the peace and quiet. I love being close to Snowshoe because I ski in the winter and mountain bike in the summer. I love the dark skies and the peaceful quiet of Mace, WV. I never imagined an experimental mine would be proposed for this unique and special place. Now we are facing the prospect of years of dodging dump trucks on 219 and industrial level noise from trucks, heavy equipment and blasting and dusk to dawn industrial lighting. There is also the very real possibility our well will be contaminated by chemicals or dewatered as vibrations from NIOSH underground blasting travel through the fragile Karst geology that defines this region . . .

## Sample Letter

Your Name  
Your address

Date

Representative's Name  
Representative's Address

Dear \_\_\_\_:

I am writing today to ask for your support in opposing the location of the new National Institute for Occupational Safety and Health (NIOSH) underground research facility at a proposed site in Mace, WV.

I am a resident of \_(local address)\_. I know the Mace area well and understand the devastating impact the NIOSH project could have here. This scenic area in northern Pocahontas, southern Randolph Counties is simply not the right location for an underground project of this scope. Please help us re-direct NIOSH to a better, more cost-effective location elsewhere in our state where this important work could continue long into the future – without threatening the safety, economy and environmental integrity of our community.

There are many reasons Mace should not be considered as the site for this NIOSH project. I would like to highlight a few. ***(Select one or two from the bullet points below.)***

- The Mace site sits in the heart of an environmentally fragile and pristine area that draws outdoor enthusiasts from around the world to enjoy our natural beauty. It is adjacent to Snowshoe Resort, which has gone on record as adamantly opposing the NIOSH project for its negative impact on Snowshoe operations and the local tourist economy. Why compromise a region dependent on its environmental integrity? There are many regions in West Virginia where mining is already well established, with geology proven to safely support underground mining. It doesn't make sense to bring this level of blasting, construction and contamination to an area known as "Nature's Playground," "Forever Wild," and "Birthplace of Rivers." If there is any doubt about how important the tourism economy is here, consider the latest official figures on tourism revenues -- \$113 Million in Pocahontas County alone! Let's not jeopardize this.
- The environmental threats of the NIOSH project are real and have tremendous consequences for our community – beyond their impact on our tourism economy. The project sits at the headwaters of both the Tygart Valley and Elk Rivers. Delicate karst geology throughout this region could easily disrupt the existing flow of clean

water feeding both rivers. In fact, groundwater dye trace studies completed in 1976 document a rare underground connection in these sensitive watersheds. The health of our pure native trout streams and rivers at risk, but so is the drinking water for our local residents.

- The location of this experimental deep mine is upstream from or immediately adjacent to communities dependent on clean spring and well water. No public water service exists for a growing number of neighboring residents, many of whom choose to invest here because of our pure environment. The blasting and tunneling required to build this 164,000 gross square foot NIOSH facility 500 feet underground, combined with the constant pumping of groundwater to the surface, is a clear risk to the safe groundwater resource of our area.

Not only could wells and springs run dry, but the only water available to local residents could be contaminated by diesel and oil based fluids, fire suppression chemicals, nitrates from blasting and unknown chemicals used in NIOSH experimental operations.

- The NIOSH site will include an Above Ground Fire Suppression Experimental Facility, with extensive use of fire foam. Fire foam contaminants include Perfluoroalkoxy Polymers (PFAs), a dangerous “forever” chemical known for contaminating water supplies in communities adjacent to fire suppressant facilities, like the National Guard training site in Martinsburg, WV.
- The heavy truck traffic this project would create would be disastrous on a narrow, mountainous two-lane stretch of Rt. 219 – a main travel corridor for the region. The NIOSH facility entrance would be located on a 7 percent grade at the border between Pocahontas and Randolph Counties on Rt. 219. This creates a major obstacle between Snowshoe and Elkins, disrupting local commuting for employment plus goods and services transport. It also disrupts a key route for tourists to Snowshoe. Local, tourist and emergency transportation would be seriously compromised, especially during the four-year construction phase. At times, truck traffic for removal of excavated materials alone will equal 116 dump truck loads PER DAY, with a steady flow of 16 dump truck loads predicted PER DAY as excavated limestone is hauled offsite. Not only would this often bring traffic to a standstill on Rt. 219, but this could compromise the long-term integrity of a traffic corridor essential to our region.
- And in a time when we all know how important good jobs are to our local communities, it is important to remember that the number of jobs at the NIOSH facility is 12. Just 12, with the majority of those positions to be filled by Ph.D. mining engineers from elsewhere. One dozen jobs that threaten countless other good, longstanding jobs created by local businessmen and women who know that our future here is tied to a healthy, vibrant environment.

Please help us stop this threat to our community.

Thank you for taking the time to read my concerns, and thank you for a response on this important issue.

If I can help you with any follow-up, I can be reached at:

Sincerely,