



## ***Friends of the Blue Ridge Mountains***

# **Organizational Impact Statement**

1. Name of Organization – ***Friends of the Blue Ridge Mountains***
2. Contact Person –

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3. Mission—

The mission of *FBRM* is to preserve, enhance and celebrate the Blue Ridge Mountains as a valuable resource and treasured space for present and future generations.

4. Constituency—

*FBRM* considers its primary service area to be the six counties between Harper's Ferry and the Shenandoah National Park because collectively these counties have large areas of the Blue Ridge Mountains in private ownership. Membership is open to anyone interested in preserving, enhancing, and celebrating the Blue Ridge Mountains.

5. Summarize the key issues related to the Mid-Atlantic Resiliency Project as they affect your organization's mission and constituency:

The Blue Ridge is a remnant of one of Earth's oldest surviving mountain chains. The "preserve and enhance" portion of Friends' mission requires that we remain forever vigilant in protecting our Blue Ridge from all who would exploit it wantonly for corporate greed or private gain.

The Blue Ridge is beloved by many, near and far, for diverse reasons. For residents in Jefferson, Clarke, and Loudoun Counties whose homes are sufficiently close to the portion of the Blue Ridge that would be impacted by the proposed MARL, the Blue Ridge in its changing moods supplies them with emotional security, a sense of well-being in a troubled world, a haven from all the uncertainties in our fast-paced lives.

Reaching farther to include all its innumerable admirers who seek out the Blue Ridge as a place for recreational rejuvenation, or of simple quietude from life's stresses of many causes, the Blue Ridge is a haven that cannot be removed from the routine of our lives. We recreate there in

several ways: from the families with toddlers first learning how to walk a trail, to the exuberant young adult eager to run a trail marathon, or the through hiker on the Appalachian National Scenic Trail (AT) enjoying this mid portion of her 2200-mile adventure from Georgia to Maine.

The AT traverses close to the Blue Ridge ridgeline crossing the right-of-way of the existing FirstEnergy transmission line before descending along Loudoun Heights on its way down to Harpers Ferry. Thousands use this section of the AT over the year, and this number has been rapidly increasing year over year since the beginning of the COVID-19 pandemic.

The Blue Ridge is also home to abundant communities of wildlife for which its forests provide food and shelter. These populations require the protection of the Blue Ridge forested ecosystems to thrive. In addition to its resident wildlife populations the Blue Ridge also serves as a wildlife migration corridor. This function is very important in a rapidly warming world where individual species and entire ecosystems are migrating upslope and from south to north. Additionally, the Blue Ridge is an important component of the Atlantic flyway for migrating hawks and other raptors.

Also, critical to maintaining human wellbeing in the Valley and the Piedmont are the hydrological services provided by the forested slopes of the Blue Ridge. The soils of these undisturbed forests absorb rainfall, slowly releasing it throughout its water table to form springs and intermittent water courses. This process greatly slows erosion, prevents landslides, and maintains flow levels in streams that feed the lowland rivers, as well as maintaining water table levels in the foothills at the base of the Blue Ridge.

The Blue Ridge's forests also moderate our weather extremes. They cleanse our air of air pollutants, some which travel from far away. They are an important carbon sink to help slow the warming of our planet, and they help replenish our oxygen supply.

For all these services, the Blue Ridge is a special place that must be treated with great care when considering a major development that could significantly change its present structure and functioning. We must understand before we act.

It is important to recognize that FirstEnergy's existing 138kV transmission line has been in place for more than 50 years, and that the power it transmits serves a public need. 50 years ago, the Appalachian National Scenic Trail did not enjoy its current level of protection. Indeed, the National Park Service did not own the land along the Blue Ridge traversed by the Trail, nor did it own the corridor lands surrounding the Trail. Friends of Blue Ridge Mountain did not exist, and Sweet Run SP was a farm. All these advances in public access to, and enjoyment of, this portion of the Blue Ridge have occurred since this transmission line was built.

Now, as we become aware of the importance of respecting the several Blue Ridge values we enjoy today, we must work doubly hard to resist future harm, while simultaneously working to enhance the ill effects of harm that occurred in the past.

The natural resources of the Blue Ridge can be considered as a complex of interacting natural systems: geological, hydrological, climatological, several intersecting ecological systems, and these are intertwined with human economic, cultural, and sociological systems. If we push one of these systems beyond its normal functioning it interacts with other systems to nudge their functioning outside of their normal boundaries. The result is stress for humans and ecosystems alike, perhaps even leading to chaos.

If FirstEnergy proposes simple replacement of the existing 138kV line by a conventionally designed and built 500kV transmission system, underslung with a 138kV line, the potential for great harm to the Blue Ridge's several interacting natural and human systems would result. Construction of industrial scale infrastructure on steep slopes could during both the construction phase and operational phase greatly challenge the capacity to control storm runoff and soil erosion, particularly with ever increasingly intense rainfall events driven by climate change.

The effect of mammoth scale towers dominating the landscape will markedly adversely affect many users of the Appalachian Trail and Sweet Run SP. Not only would there be this dominating visual impact, but the possibility also exists for adverse noise impact as well from the 500kV line. The historic heritage of Sweet Run valley would be overshadowed by looming towers. The apparent pristine nature of the Blue Ridge viewed from a distance would be irreparably marred.

We must assess with deep insight any proposal FirstEnergy makes to fulfill its assigned role under MARL. Moreover, we must be prepared to propose alternative solutions that could substantially reduce the harm to Blue Ridge by a FirstEnergy recommended action. Friends is working to strengthen its capacity to react swiftly and forcefully when FirstEnergy's plans become known.

It is not possible to make a detailed response to this question until FirstEnergy announces its plan for this segment of the proposed MARL. Meanwhile, Friends of Blue Ridge will be working to prepare a strong case for protecting our beloved Blue Ridge Mountain.

6. Describe specific results/outcomes to your mission and constituency that will arise if the transmission lines are built in Loudoun County Greenspace. Be as specific as possible, including any statistics that are available to you:

The Friends of Blue Ridge Mountain's mission is focused on protecting the natural resources and historical patrimony of the Blue Ridge region. We understand LTLA's use of the phrase, "Loudoun County Greenspace" in this question to refer to the segment of the MARL proposed to be built by NextEra across historical districts, farmlands, and agrotourism establishments on western Loudoun's Piedmont, while *FBRM's* principle focus is on the adverse consequences of

FirstEnergy's activities if it would undertake to build its segment of the MARL across the Blue Ridge in very western Loudoun County and eastern Jefferson County.

*FBRM* understands that linkages exist when considering alternative approaches to mitigating impacts from developing new transmission capacity in these two areas. For example, if the proposed alternative to MARL that would replace the cables on existing transmission lines in western Loudoun with Advanced Composite Core Cables were found to be a desirable solution, it may be possible that the need for First Energy to rebuild its line across the Blue Ridge might no longer be necessary.

Most importantly, we recognize that the residents and citizen protectors of both these subregions share a common interest in protecting their lands' ecological integrity, the socioeconomic viability of its residents, and their quality of life. We gain political strength by standing in mutual support of the interests of each other.

The FirstEnergy segment extends along the existing right of way (ROW) of a 138kV transmission line running from a substation in western Loudoun, westward, crossing SR-671 (Harpers Ferry Rd.), where it crosses Sweet Run SP, running up to the crest of the Blue Ridge. Before reaching the crest, this line crosses one or more parcels owned by the Appalachian Trail Conservancy, and then several parcels owned by the National Park Service that form the corridor lands on both sides of the Appalachian National Scenic Trail. The transmission line then descends the western slope of the Blue Ridge in Jefferson County by generally following the Hwy 9 road corridor, thence crossing the Shenandoah River.

The existing 150-160-foot-wide transmission line ROW has grievously scarred the Blue Ridge. What would be naturally forested land has been replaced with grasslands prone to erosion on its steep slopes. Towers and cables dominate scenic areas in Sweet Run SP, while hikers along the AT have their trail serenity suddenly compromised by this monster construction intruding over the Trail. All this transmission line corridor must be repeatedly manipulated to prevent tree regrowth, creating ecosystem instability, and a stark visual contrast with the adjacent natural areas.

The specifics of the FirstEnergy MARL proposal have not been made public. What is known is that the general plan for the proposed MARL would be to route it over the Blue Ridge on the existing transmission line corridor currently owned and operated by FirstEnergy corporation.

FirstEnergy to date has been silent regarding its plans. This lack of transparency encourages wide speculation by public interest groups concerning what FirstEnergy will need to do to bring MARL over the Blue Ridge, and what the impacts of that might be. Until FirstEnergy is willing to divulge its plans to the public, we must be prepared to assess impacts for MARL Blue Ridge crossings lying outside the bounds of the bland public statements available today.

A more extreme scenario with respect to consequent impacts would be for FirstEnergy to create an entirely new corridor over currently forested lands that cover the flanking slopes and

ridgeline of the Blue Ridge. A simple calculation suggests that removal of the forest cover over a 200-foot-wide transmission line corridor might result in the rapid release of thousands of tons of carbon dioxide per mile of removed forest, and the continuing failure of this removed forest to remove another 30 tons of carbon dioxide per mile per year, as well as failing to release 160 tons of oxygen per mile per year. Also impacted would be the hydrological impacts on water storage and release to surface waters as outlined in Question #5. This data is drawn from several sources including: the Georgia Transmission Corporation; the Electrical Engineering Portal; US Forest Service; Arbor Day Foundation; US Environmental Protection Agency; and the Nature Conservancy.

What can be reasonably inferred as a likely scenario is that the existing 138kV line with its towers would be taken down, to be replaced by more monstrous, in width and height, towers capable of handling 500kV cables that are proposed to be underslung with 138kV cables. This would greatly increase the visual impact and possible auditory experience of users of the AT (a linear national park) and of Sweet Run SP. The new highly industrialized transmission cables and towers would also intrude on the 19th century historical setting of the Sweet Run valley, thus detracting the visitor further from experiencing what life was like for these early settlers on our land.

An intermediate scenario in impacts experienced could be the technical need for FirstEnergy to widen its existing transmission corridor. Of course, where the consequences of this scenario would lie between these two extremes would depend on the width of additional right of way sought.

In any event, the necessary construction work would require the use of heavy machinery on steep slopes, thus greatly increasing the soil erosion problem. If an increased ROW width were required, serious issues with the AT corridor lands could arise. The 1972 powerline corridor easements are lax in their requirement for the line owner to restore disturbed areas to achieve soil and hydrological stability. Each of these issues must be addressed when FirstEnergy makes its plans public, and solutions found that minimize adverse effects on natural and human resources.

In summary, replacing one, very unfortunately sited, transmission line with another of massive industrial scale on the slopes and summit of the Blue Ridge will result in extensive harm to the users' experience on our park lands, and create additional ecological disturbance and instability on our Mountain. Our historical patrimony would be degraded by this intrusion, as would the quality of life of nearby residents. Further, a precedent would be set for further industrial intrusion on the Blue Ridge. Great caution must be exercised when considering a balance that would optimize the public good if the proposed MARL were to be constructed across the Blue Ridge.

7. List any research sources that support your projections of the impact on your mission and constituency:

To be supplied later after FirstEnergy announces an outline for its plans to remove and replace its transmission line over the Blue Ridge.

8. Share individual case studies of people, places, or things that will be affected by this project (no more than three):

To be supplied later after FirstEnergy announces an outline for its plans to remove and replace its transmission line over the Blue Ridge.

9. Upload any visuals available that illustrate or support your impact statement.

To be supplied later after FirstEnergy announces an outline for its plans to remove and replace its transmission line over the Blue Ridge.