



Position Statement Regarding Proposed KOA Campground in Great Cacapon, WV

April 25, 2023

The Mission of Potomac Riverkeeper Network is to protect the public's right to clean water in the Potomac and Shenandoah Rivers and their tributaries. We stop pollution to enhance the safety of our drinking water, protect healthy river habitats, and enhance public use and enjoyment. The mission of the Friends of Cacapon River is to preserve, protect, and promote the environmental health and scenic character of the Cacapon River and its watershed. The following statement is a joint position regarding the proposed KOA campground in Great Cacapon, WV.

The proposed KOA Campground project is located within the Upper Potomac and the Cacapon River watersheds, and has therefore been reviewed by our organizations. The Upper Potomac watershed is impacted by pollution issues ranging from acid mine drainage to failing wastewater treatment plants. Sediment and nutrient pollution from land-based activities, such as farming and construction, are also significant issues that impact our rivers and streams. Climate change and increased weather events in severity and duration have exacerbated stormwater pollution from land activities. After careful review of the proposed KOA Campground, Potomac Riverkeeper Network and Friends of the Cacapon River take a precautionary approach to the project, meaning work should not begin until satisfactory assurances are provided by the developer to address the following concerns with measures that can be independently verified.

Wastewater connection and Treatment: PRKN conducts permit reviews through a review of the EPA ECHO database system. The wastewater treatment plant in Great Cacapon has not violated its discharge permit for the last 6 quarters (1.5 years) and remains in full compliance. According to the state water discharge permit (NPDES permit), the facility has sufficient capacity to accommodate the proposed KOA effluent volume without exceeding its capacity. However, the current system hasn't been tested at the proposed discharge volumes and has only encountered small volume flows into the facility with some increases due to seasonal residents or older sewer systems with an aging infrastructure that may have cracks, allowing ground and surface water to flow into the sewer system during rain events. Caution must be taken to ensure the new larger volumes of effluent from the KOA will not overwhelm the existing waste treatment process.

The proposed routing of the new sewer line to the wastewater plant in Great Cacapon must cross the Cacapon River. The proposed use of horizontal directional drilling to route the sewer line under the Cacapon River does come with potential risks of sediment pollution from equipment use and in more severe cases, a rupture of the drilling mud directly into the river. We are requesting that the State and Scenic, LLC take extreme caution to ensure as minimal a disturbance as possible to prevent any pollution entering the river during the sewer line routing phase of the project.

We strongly encourage Scenic, LLC to minimize sediment impacts on the watershed during and after construction. We call for Scenic, LLC to protect the riparian area, within 100 feet of the stream bank. Scenic should exclude campsites and support infrastructure from being located within the riparian buffer and no construction activity should occur within 100 feet of the stream bank. We encourage Scenic to minimize mature tree removal and protect the existing plant community including grasses, perennials, shrubs, and woody vegetation. . In addition, we encourage Scenic, LLC to install additional native

perennials, grasses, shrubs and tree plantings. We are encouraged that the Berkeley Springs KOA includes stormwater best management practices.

Stream Habitat Disturbances and Public Access: The mission of PRKN and FCR includes the protection of healthy habitats and enhancing the public use and enjoyment of the rivers and streams in the Potomac and Shenandoah Rivers. The current public access to the Cacapon River at the bridge on Cacapon Rd is within the property lines of the proposed KOA. We strongly encourage that the access to the river remains open to the public and that the KOA would also ensure proper maintenance of the access area.

We also understand that an increase in patrons enjoying the Cacapon River brings a certain potential for stream habitat disturbance. The Cacapon River is home to many important aquatic floral and fauna, including some endangered mussel species. We strongly encourage the KOA property managers to have a "Leave No Trace" policy and signed commitment of campers during the registration process. This may help to reduce nuisance disturbances of the stream habitat.

Emergency Response to Pollution Releases: Great Cacapon and by extension the KOA is in an isolated location that does not have quick access to emergency services. There should be an Emergency Response Plan for Great Cacapon in case of an emergency. With the recent train derailments across the country, there is a growing concern that our towns and communities located along rail lines are more susceptible to severe emergency situations that could cost human lives and cause environmental harm. The CSX tracks accommodates a number of industrial products that may become dangerous to people and the environment if there was to be a derailment in or near Great Cacapon. The development of the KOA adds a layer of traffic concern that must be factored into an Emergency Response Plan. Increased traffic on Cacapon Road may become an impediment to emergency services in responding to an incident.

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