



Nature's Mountain Playground

April 6, 2017

Nathaniel J. Davis, Sr. Deputy Secretary
Federal Energy Regulatory Commission
888 Frist Street NE, Room 1A
Washington, DC 20426

RE: Atlantic Coast Pipeline CP15-554-000 DEIS comment

Dear Mr. Davis;

The Pocahontas County Convention and Visitor's Bureau (CVB hereafter) is dedicated to promoting tourism which strengthens our community through job creation and education while protecting the environment, sharing our culture and preserving history. With this said, it is reasonable to assume the CVB has a major stake in the debate regarding the construction of the Atlantic Coast Pipeline (ACP) through Pocahontas County, West Virginia.

The tourism industry is the leading economic backbone for Pocahontas County, WV and positively impacts the private sector and tax revenues. Supporting the future growth and development of the tourism industry in the county is a key to maintaining a stable, existing economic strategy.

This letter of comment on the ACP DEIS is specifically directed to the sections dealing with tourism related issues and in particular the impacts to Pocahontas County, WV which has the most potential for tourism impact than any other county in the ACP path. Consider the Pocahontas County WV tourism facts:

- According to the WV Division of Tourism, one out of four jobs in Pocahontas County is generated by travel and tourism and the total earnings and employment from the tourism industry in Pocahontas County is greater than in any other county in West Virginia.
- Pocahontas County, WV is a year round destination recording over a million visits by travelers per year.
- According to a spring 2014 survey of visitors to Pocahontas County conducted by the CVB, the average daily visitor spending is between \$100 and \$200 with the total estimated economic impact of visitor spending over \$100 million on lodging, meals, gasoline, retail, entertainment etc. This is a higher projection than your DEIS table 4.9.5-1 based on local data collection.
- The most recent three year average Hotel/Motel tax collection generated \$1.52 million equating to an average of \$25 Million dollars in annual lodging revenue.
- This Hotel/Motel tax supports numerous organizations within the community to deliver quality programming and services to the visitor and resident alike and includes the CVB, Pocahontas County Parks and Recreation, Pocahontas Arts Council, Pocahontas County Landmarks Commission, Pocahontas County Dramas Fairs and Festivals, Pocahontas County Free Libraries, Preserving Pocahontas, Pocahontas County EMS, Pocahontas County Volunteer Fire Departments and the Pocahontas Memorial Hospital.
- The tourism impact on Pocahontas County households relieves property owners of an estimated \$1,031 annually in property taxes – the fourth largest in West Virginia following only counties with gaming, according to the WV Division of Tourism.

- Pocahontas County is abundant in tourism rich assets and positive growth potential continues to present itself. Snowshoe Mountain Resort, The Greenbrier River Trail State Park, Cass Scenic Railroad State Park, Watoga State Park, Green Bank Observatory and a host of other attractions compliment the 800 miles of hiking and mountain biking trails, ski slopes and the many outdoor recreational opportunities which exist in the county and which drive a thriving economic base for the county residents.
- *Nature's Mountain Playground*, the tourism 'brand' the CVB has developed and successfully marketed, represents well what the county offers a tourist and why a tourist visits the county. According to recent surveys by both the CVB and the WV Division of Tourism, the number one reason visitors choose a vacation destination is for scenic beauty. Pocahontas County offers more scenic byways than any other county in West Virginia. The county is rich in natural beauty with sixty two percent (62%) of the county's land made up of the Monongahela National Forest, five state parks and two state forests. This vast public lands combined with the scenic value of the farming communities dispersed throughout the county, create an area largely known for being pristine in beauty.
- Pocahontas County has been well known as the Birthplace of Rivers since 1716 and eight rivers' headwaters are found in Pocahontas County. With this, the recreational component to tourism such as native trout fishing relies heavily on the high quality streams and rivers of the county. The upper Elk River trout waters, for instance, are some of the finest in the eastern US. The upper Big Spring fork which feeds the Elk is a nursery for wild fish populations. The upper Clover Creek is another truly wild Brook trout stream. These waters are unique in many ways but what stands out is the sustainable wild brook, Brown and Rainbow populations in this watershed. They are not stocked as many other West Virginia streams are. This is due to the strong wild reproduction that occurs on Big Springs fork and below the confluence on the Elk at Slatyfork. Several contributing natural conditions provide what a wild fish needs. The water temps are rarely over 60 degrees year round which trout need to survive. The amount of insects on the upper reaches of the Elk River and its feeder streams are unique to this river.

The ACP will impact tourism in Pocahontas County and it should be the goal of the ACP to mitigate the impact to the maximum extent possible. The CVB requests FERC provide close and diligent scrutiny to the tourism concerns listed below.

- Hotel/Motel tax decline – the DEIS does not address this measurable concern or recommend how this loss of revenues will be compensated. Based on the DEIS section 4.9.3, a strong potential exists for the influx of temporary jobs in the county to overload lodging establishments for an extended period of time. Pocahontas County offers vacation market lodging such as resort, motel and cabin lodging inventory to accommodate temporary housing however with extended stays, the Hotel/motel tax will be waived for these transient ACP employees. This will offset the Hotel/Motel tax revenues that otherwise would be generated by short-term tourist overnight stays by taking valuable rooms off the vacation market inventory. This will significantly impact the budget of the Pocahontas County CVB and the marketing efforts of the CVB which is the primary beneficiary of the hotel/motel tax. Tourism and marketing go hand-in-hand. Without tourists spending the night in local lodging, the hotel/motel tax declines and the marketing budget goes down. In order to offset the negative impacts of the pipeline, marketing not only needs to be steady, additional marketing will be necessary to sustain visitation to our area known for scenic beauty. In addition, the other organizations receiving hotel/motel tax will have significant impact to their operating budgets and will have difficulty maintaining the same level of operations because of the significant decline in funding as a direct result of ACP employees extended stays.
- Short-term and permanent view shed impact - Visitors surveyed indicate the number one reason they travel to Pocahontas County is for the scenic beauty. The CVB is concerned about the permanent impact the pipeline will have on this highly valued asset.

- Road surfaces - Pocahontas County is fortunate to have significantly better maintained roads than most of West Virginia and these roads are a key asset to the traveler's experience, making a strong, positive impression on the traveler coming into the county and especially to motorcycle enthusiasts who choose Pocahontas County as their destination because of the quality roads. The road surface impact has potential to detract this special segment of the travel market, without proper repairs made post construction.
- Long-term impact to the environment and water quality – As the *Birthplace of Rivers*, this potential negative impact may be a detriment to the natural environment that brings a segment of the traveler to Pocahontas County. The tourism based recreation in the county is reliant on existing high quality streams and rivers. The Elk River, Big Springs Fork and Clover Creek are primary streams that provide high quality habitat for native trout, a special segment of the outdoor enthusiast market that visits the county for a unique fishing experience.
 - Silt and runoff from construction has high potential to coat the stream bottom to the point that the invertebrate (bugs) will not reproduce and then the wild trout populations will suffer. The pipeline construction is highly likely to impair the wild fish population to a point of non-existence thus also negatively impacting existing guide services and fishing lodges that use the Elk River and other native trout streams to support their livelihood not only during construction but post construction.
 - Once the ACP enters Pocahontas County it will pass through 18 miles of upper Elk River tributaries. These 18 miles all drain into the Elk River. Some of these waters flow on the surface and some sink into caves and fishers that make up a huge underground cave and spring system. The amount of dirt and tree removal in these areas could have adverse effects on water quality both for the wild trout populations and residential water supply.

According to the DEIS table 4.9.5-1 Pocahontas County has the second highest travel impact, second to only Harrison County, WV in terms of dollars. The tourism economy is the most vulnerable to negative impacts from the ACP compared to any other economic segment therefore Pocahontas County is the most vulnerable of all ACP area counties because the Pocahontas County economy is primarily reliant on tourism expenditures. Tourism is a product that is subject to the fickle nature of the traveler. An extra burden and higher standard of quality is expected on behalf of the public's interest and for travel destinations like Pocahontas County that are so strongly tied to natural resources and outdoor recreation. The Pocahontas County CVB Board of Directors value the attributes which support the tourism product in this county and expresses these concerns urging FERC to follow due diligence in this matter by carefully weighing the impacts the construction and operations of a pipeline and the long-term unknowns may have on an existing, thriving tourism economy which is currently positioned to continue growing through thoughtful development and promotion.

Sincerely,



Cara H. Rose, Executive Director
On behalf of the Pocahontas County CVB Board of Directors

Document Content(s)

ACP_CP15-554-000.PDF.....1-3