



# Potomac Valley Audubon Society

[www.PotomacAudubon.org](http://www.PotomacAudubon.org) | P.O. Box 578, Shepherdstown, WV 25443 | 304-676-3397

To: Jefferson County Officials and Community Members  
From: Potomac Valley Audubon Society  
Re: Opposition Statement on Rockwool Plant proposed for Jefferson County, WV

The Potomac Valley Audubon Society (PVAS) has served Berkeley, Jefferson and Morgan Counties in West Virginia since its founding in 1982 as a chapter of the National Audubon Society. We currently have 828 household members; 301 of those households are located in Jefferson County. Our mission is “preserving, restoring, and enjoying the natural world through education and action.” The organization provides leadership in environmental, conservation, and natural history concerns in our region. We manage four nature preserves in the Eastern Panhandle totaling over 500 acres, provide science education to over 8,000 school children annually, serve children in our community through our nature camp programs, and offer adult programs focused on natural history. We participate in efforts to save natural habitat locally and in other areas of WV and provide assistance to citizens in monitoring conservation actions in our community.

Rockwool would set a dangerous and unnecessary precedent for air pollution and water pollution in Jefferson County. Placement of a heavy industry and a new major source of air emissions of pollutants in the heart of Jefferson County goes against our mission. We want to see air quality and habitat preserved so that the residents of the county, particularly children, can enjoy the outdoors in a healthy environment, not one that is characterized by potentially dangerous levels of carcinogens and other hazardous pollutants.

## Our main concerns stem from:

1. **Threats to Air Quality:** PVAS encourages people to be outdoors. The addition of emissions from Rockwool to air quality in Jefferson County poses a threat to all residents but particularly to the most vulnerable in society—the children, the elderly, and those with compromised respiratory systems.
2. **Threats to Water Quality:** PVAS is concerned that atmospheric deposition of pollutants originating at Rockwool will contaminate streams and wetlands. We are further concerned about the viability of onsite wastewater settling ponds. WV does not have a good record of regulating slurry ponds at mountaintop removal sites where leakage from ponds has poisoned local aquifers, wells, and streams.
3. **Threats to Streams, Wetlands, and Rare Marl Marshes:** The health of streams, wetlands, and marl marshes and the valuable habitat they support is dependent on the elevation of the water table. Rockwool proposes to withdraw 125 thousand gallons of water per day at first and up to 500 thousand gallons of water per day in the future. The internal underground drainage systems in karst areas like we have in Jefferson County are very sensitive to extraction. Removing this much water from the aquifers can have very serious and unpredictable adverse consequences. Lowering of water tables can affect the hydrologic equilibrium of local streams as well as wetlands, including rare marl marshes, at substantial distances from the point of extraction. The potential impact is loss of critical wetland and riparian habitat for threatened and endangered species of plants and other forms of wildlife.

*A proud partner of the United Way of the Eastern Panhandle  
and the Combined Federal Campaign (#29061).*



4. **Threats to Endangered, Threatened, and Rare Species:** In addition to the twenty-seven rare species found in our local marl marshes, there is one federally-listed Threatened Species identified in Jefferson County: the Madison Cave Isopod. This isopod, a small crustacean that lives in groundwater, has been documented in three locations in Jefferson County including two sites near Rockwool. We are not aware that Rockwool has investigated the environmental impact that its proposed pumping will have on this important Threatened Species. There are other species of great concern found in streams, marshes, fields and ridges in our area. For example, the WVDNR identified several "High Quality and State Mussel Streams" in Jefferson County including Evitts Run, Bullskin Run, Elks Run, and Long Marsh Run. The USFWS and the WVDNR also maintain lists of species of concern. The Baltimore Checkerspot butterfly and Sedge Wren have also been identified at our Cool Spring Preserve, and are both conservation species of concern. As far as we know, Rockwool has not investigated the environmental impact that its proposed atmospheric emissions and pumping will have on other species of concern.

5. **Threats to Migratory Birds:** PVAS has a particular interest in not only the indigenous bird populations, but migratory birds as well. Positioned on the Atlantic Flyway and immediately to the east of the Allegheny Front, many migrating birds take advantage of the winds that waft off the mountains and ridges of the Appalachian range to mitigate the challenges to their biennial long-distance flights. By definition, all migratory birds are protected under the Migratory Bird Treaty Act, which not only protects the birds themselves but also sets stipulations to protect habitats necessary for the birds' survival. The air emissions from the Rockwool plant, especially particulate matter, will create hazards to migrating birds using the Atlantic Flyway. We are not aware that Rockwool has investigated the potential impact of its emissions on migrating birds.

In light of these threats, and the fact that Rockwool has not fully investigated the potential environmental impacts that we mention, we urge you to reject the siting of the Rockwool plant and to choose a path of development more compatible with protecting human health and the conservation of the natural resources and sensitive habitats found in Jefferson County.

Sincerely,



Suzanne Offutt, Board President