



United States Department of the Interior

NATIONAL PARK SERVICE
Appalachian National Scenic Trail
P. O. Box 50
Harpers Ferry, West Virginia 25425

IN REPLY REFER TO:

April 2, 2008

Mr. Joseph Kroboth
Washington County Division of Public Works
100 West Washington Street, Room 238
Hagerstown, Md. 21741-4738

Mssrs. John Barr, Terry Baker, James Kercheval, William Wivell, and Kristin Aleshire
Washington County Commissioners
100 West Washington Street, Room 236
Hagerstown, Md. 21740

Dear Mssrs. Kroboth, Barr, Baker, Kercheval, Wivell, and Aleshire:

I am writing to you regarding Washington County's proposed 190-foot communications tower at Keep Tryst Road, in Washington County, Maryland. The site is located within ½ mile of three national park units: the Appalachian National Scenic Trail, Harpers Ferry National Historical Park, and the C&O Canal National Historical Park, and is highly visible from several key scenic features within and adjacent to these units of the national park system. I would like to specifically address the concerns of the National Park Service with respect to the Appalachian National Scenic Trail.

As you may be aware, the Appalachian National Scenic Trail is one of our nation's most important scenic and recreational resources. Conceived in 1921 and completed by 1937, this 2,167-mile footpath was protected by federal legislation in 1968, when the United States Congress passed the National Trails System Act (16 U.S.C. 1241 *et seq.*). In passing this legislation, Congress designated the Appalachian Trail as our nation's first national scenic trail and directed the secretaries of Interior and Agriculture to protect the Appalachian Trail "to provide for maximum outdoor recreation potential and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass." The Appalachian Trail is managed in partnership with its founders and builders, the Appalachian Trail Conservancy and its affiliated Trail clubs, and more than 80 state and federal agency partners. It provides opportunities for millions of Americans to enjoy the scenic and natural wonders of the Appalachian Mountains.

As are a number of other organizations and agencies, we are very concerned about the potential negative visual impact that the proposed 190-foot Keep Tryst Road communications tower may have on the Appalachian National Scenic Trail and its visitors.

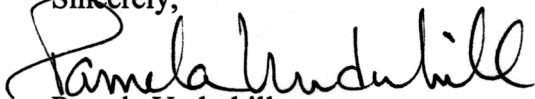
Representatives from our office and the other affected national park units have viewed the proposal from a number of different locations. Four of those locations are of particular concern: (1) the view from the Goodloe Byron Overlook at Weverton Cliffs along the Appalachian National Scenic Trail; (2) the view from Potoma Wayside in Harpers Ferry National Historical Park (which was originally purchased to provide protection for the Appalachian Trail); (3) the view from the battery on Maryland Heights in Harpers Ferry National Historical Park; and (4) the view from the Loudoun Heights Overlook in Harpers Ferry National Historical Park (which is located off a major side trail to the Appalachian Trail). The proposed facility also would be visible from a number of other highly scenic locations in the tri-state area, including the Potomac River (along a section used heavily by rafting companies and kayakers), Maryland Routes 340 and 67, and the future route of the Potomac Heritage National Scenic Trail.

If Washington County insists on proceeding with their current proposal, we believe that it would be entirely appropriate for our office to request that the Federal Communications Commission conduct a full environmental review, consistent with the National Environmental Policy Act and Section 106 of the National Historic Preservation Act. Alternatives that should be evaluated in the assessment should include, at a minimum: (a) alternative sites, including sites on federal lands administered by the National Park Service that could be exchanged to the county; (b) a combination of two alternative sites; and (c) a combination of a significantly lower tower at the proposed site and a second tower at an alternative site. (An existing 65-foot tower at the proposed location is practically invisible from all surrounding areas. We have indicated previously that a tower of similar height would be acceptable.)

In closing, we intend to ask that FCC require that Washington County develop alternatives to the proposed 190-foot tower, preferably in cooperation with National Park Service's communications system personnel. We believe that alternatives exist that will allow the county to achieve its objectives without compromising the recreational, scenic, and historic values of the Appalachian National Scenic Trail, Harpers Ferry National Historical Park, and the C&O Canal National Historical Park. As currently proposed, however, the county's communications tower would only achieve one objective at the expense of the other.

Thank you for your consideration of our concerns, and thank you for your assistance in ensuring that one of America's national treasures is properly protected. Please do not hesitate to contact me (at 304/535-6279) or Don Owen of my staff (at 304/535-4003) should you wish to discuss this matter further.

Sincerely,


Pamela Underhill
Park Manager