



Appalachian Trail Conservancy

February 18, 2026
LIVIC Civil
Justin Ross, P.E.
1015 Mumma Road, 2nd Floor
Wormleysburg, PA 17043

Cc: Middlesex Township

Re: In response to letter ATC received from LIVIC Civil on February 2, 2026 from Justin Ross at LIVIC Civil in response to ATC's January 9th letter of concern sent to Middlesex township.

Dear Mr. Ross,

The Appalachian Trail Conservancy staff, Trail management partners (including staff from the National Park Service) and other technical experts have reviewed the comments provided by LIVIC Civil in the A.T. Response letter, Viewshed Exhibits, and Phase 1A_1B Landscape design dated February 2nd. This further review and discussion with technical experts have raised additional questions and concerns which we outline below. Given the scale and impact of the proposed plan we prefer to respond in writing and by copy of the Township, county, and permitting agencies. As a cooperative manager of a congressionally designated National Scenic Trail, the Appalachian Trail Conservancy (ATC) is requesting that these comments be added to the administrative record, along with the letter to the Township dated January 9th, 2026.

Scenic, Historic and Cultural Concerns

In our 1/9/26 letter ATC shared the following request:

1.1 We request that an independent viewshed analysis be conducted using ATC's chosen observation points. Both ATC and the National Park Service have experience preparing trail viewpoint impact analysis maps and assisting with balloon tests and the production of simulated views. We would be happy to assist with reviewing the analysis being prepared, or the eventual developer-provided visual impact study. A development of this scale adjacent to the A.T. has the potential to significantly diminish the Pennsylvania A.T. Experience

In reply LIVIC shared a document titled 2026.02.02 *Viewshed Exhibit*. ATC has the following feedback based on our review of this document.

1. This provided viewshed exhibit displays a narrow view cone, looking away from the direction of the proposed development site, from the *Cumberland Valley Overlook* viewpoint. This is not representative of the full view.
2. This analysis is non-standard in its presentation in the following ways. First, the map is "upside down", where south is towards the top rather than north, as is standard practice. Second, this schematic does not provide coordinates of the point from which they were taken nor the geographic bearings that were used to determine the extent of the view cone.



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3. The photo of the view you shared is not substantially different from our own (Appendix A). However, the view cone which was drawn does differ significantly from the viewshed map we created (Appendix B) using the point and bearings that were collected as a part of our Visual Resource Inventory in 2021. We are also sharing the view from that spot during leaf-off, when there would be the most visual impact (Appendix C) to trail users.
4. Your analysis does not include the closest viewpoint from which the development would be visible, a viewpoint from the valley less than 0.3 miles away. Not only will the development be apparent from this viewpoint, Cumberland Valley 1, but will be visible for approximately 3000-ft stretch, or, an 8-minute walk, along the A.T. in a northward direction, which will adversely affect the viewshed that trail visitors will experience in this section.

The Trail is nationally significant as a continuous, ridgeline-oriented recreational corridor intentionally sited to provide expansive views of surrounding pastoral, wooded, and culturally resonant landscapes that contribute to its historic setting and feeling. From multiple key vantage points on the Appalachian Trail, the proposed development would introduce prominent modern visual elements into views historically characterized by traditional rural land use patterns. Recently, the Trail has been deemed eligible for listing in the National Register of Historic Places as a single linear historic district under Criterion A for Recreation and Conservation and Criterion G for properties of exceptional importance within the past 50 years. The Trail corridor represents the largest protected stretch of contiguous land east of the Mississippi River and welcomes roughly 5 million visitors annually. Within a day's drive for two-thirds of the U.S. population, its accessibility and significance underscore the importance of thoughtful, comprehensive evaluation for any proposed development that may affect its scenic character, cultural landscape, or visitor experience.

As such, we have concerns with the proposed development and believe it will adversely effect the scenic, historic and cultural landscape character of the region.

Since sending our letter to the township on January 9th our review panel raised the following additional questions and concerns we would like addressed.

1. ATC requests a permit matrix including the current status of requested permits and issuing agencies, and any additional permits that will be required and corresponding issuing agencies.
2. What is the regulatory process? Are there any federal triggers including potential Section 106 review?
3. ATC requests a copy of the Environmental Assessment that has been completed.
4. ATC requests a copy of results of the initial and subsequent noise studies completed by LIVIC.
5. Water usage, discharge, and site runoff could have considerable impacts on stream ecology, hydrologic function, and the health of flood plain species along the Conodoguinet Creek. We are particularly concerned about riparian changes that may impact state listed species of concern on NPS lands immediately downstream of the project. We are interested in understanding more about the facilities' water



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- usage plans, uptake methods, and cleaning/discharge procedures. Will PADEP water withdrawal or NPDES permits be required for this project?
6. What type of generators will be used? There is concern about the use of diesel or other fossil fuel burning generators and resulting noise impacts and effects on air quality. Nitrous oxides and particulate matter 2.5 would be two of the most significant air quality impacts directly affecting hikers in the area.
 7. ATC requests a full viewshed analysis for both impacted points (Cumberland Valley Overlook and Cumberland Valley 1 (40.249083, -77.102708, 258 degrees left to 354 degrees right)), with the criticisms listed above reflected in the analysis.
 8. Impact on the eligibility for the National Register of Historic Places (described above)

Thank you for your initial consideration of our concerns, we look forward to your response and attention to these additional questions and concerns.

Sincerely,

Rachel Lettre
Regional Director, Mid-Atlantic
Appalachian Trail Conservancy
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Phone: 202-985-3580

CC:

Zach Zook, Middlesex Township Manager
Donald S. Geistwhite Jr., Middlesex Township Board of Supervisors Chair
Mark Carpenter, Middlesex Township Zoning Officer
Eileen Gault, Middlesex Township Manager
Elizabeth Grant, Cumberland County Planning Department
Kurt Speers, Superintendent Appalachian National Scenic Trail, National Park Service

Attachments:

Appendix A, B, C



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Appendix A.

The view from the Cumberland Valley Overlook during leaf on (40.29929,
-77.08662) (130 degrees to 230 degrees)



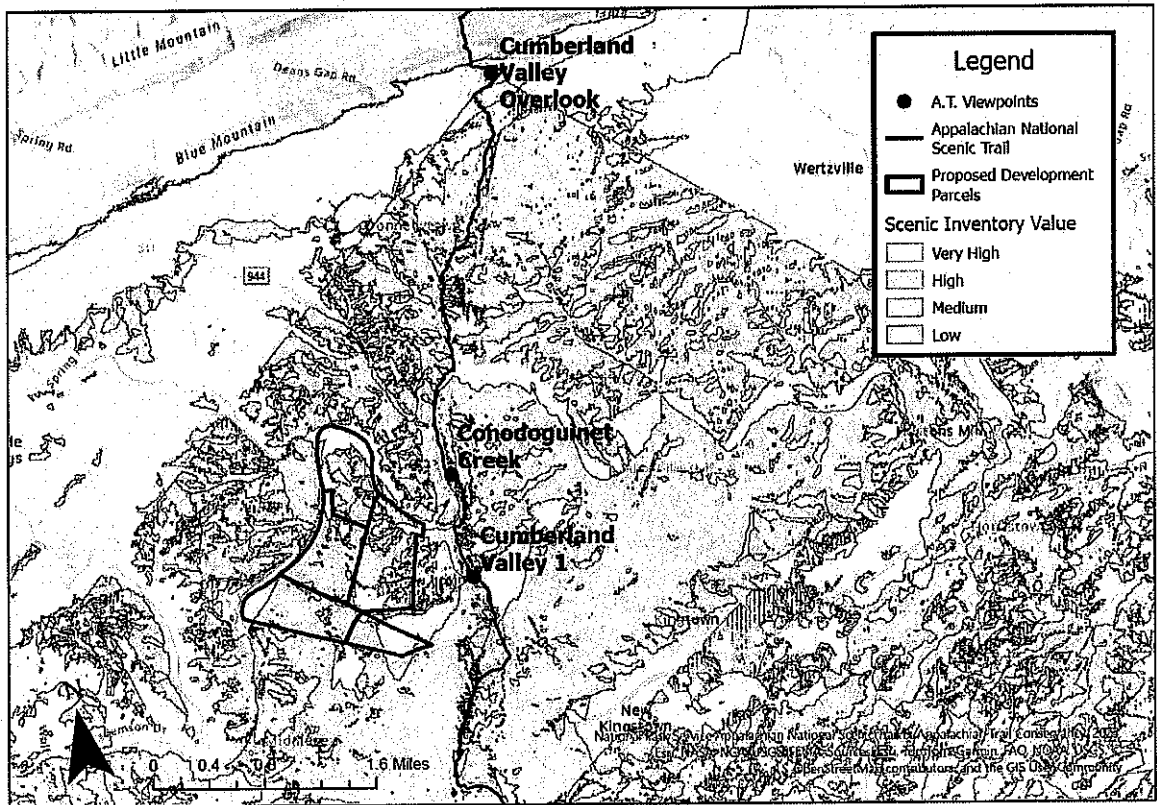


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Appendix B.

The cumulative viewshed map of the views in the area, showing the clear visibility of most of the development parcels from A.T. viewpoints.

A.T. Viewshed with Scenic Inventory Value Overlay for Northern Portion of Cumberland County, PA





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Appendix C.

The view from the Cumberland Valley Overlook during leaf off (40.29929,
-77.08662) (130 degrees to 230 degrees)

