



Introduction

The National Park Service (NPS) is proposing to remove excess and deteriorating structures within the New River Gorge National Park and Preserve (the park) as they pose a safety risk for visitors and park staff, create an unnecessary maintenance burden on park resources, are not central to the mission of the park and many are in a condition beyond repair. A total of 35 structures have been identified as potentially viable for removal and were evaluated for historic status during the planning process. Twenty one of these structures are considered historic and are either listed in or eligible for listing in the National Register of Historic Places (the National Register). In general, the historic structures have an association with industries of the area such as the arrival of the railroad and the subsequent coal industry boom of the late 19th and early 20th centuries as well as with the birth of West Virginia's whitewater rafting industry in the mid-20th century. The other 14 structures evaluated for this project were found to be not historically significant or have lost their historic integrity due to poor condition.

The park protects and preserves 53 miles of the New River through West Virginia as well as much of the scenic gorge that the river created. The park has a rich history that includes the subsistence lives of the native peoples and the later pioneers, as well as the arrival of the railroad and the ensuing boom and bust of the coal mining and logging industries. Today, the park offers spectacular scenery of the gorge and the New River as well as a diversity of recreational opportunities. The park was authorized as a unit of the national park system in 1978. With this designation, the NPS was given responsibility for planning, acquiring the land, developing, and managing more than 70,000 acres of land along the New River.

Throughout the years since the park's designation, the NPS has acquired numerous properties within the gorge, many of which include structures that are in various states of disrepair. Most of the structures were never viable for reuse or occupation by the NPS and are abandoned, failing, overgrown with vegetation, and pose both a safety risk to the park staff and visitors; all of the structures are an ongoing management burden to the park. This project proposes to demolish excess structures. The 35 structures identified as potential candidates for demolition are identified in Table 1 below. Additional detail and a representative photograph of each excess structure is available in Appendix A.

Where is the project?

New River Gorge National Park and Preserve is located in West Virginia between the cities of Hinton and Fayetteville, in Fayette and Summers Counties. The park runs from Fayetteville, the county seat of Fayette County, 53 miles southeast to the city of Hinton. The properties included in this excess structure removal project are located throughout the park, including in the Thurmond Historic District, Dun Glen, and Grandview areas in the Middle Gorge, and the Sandstone area in the Upper Gorge. The project area is shown in Figure 1; mapping of the specific structure locations is included in Appendix B.

Table 1. Excess Structures Proposed for Demolition

Structure No.	FMSS No.	Structure Name	Area/Location	Historic? / National Register Status	Figure No.
1	87692	Charles Ashley Outbuilding	Thurmond	TBD, Potentially Eligible	B-1
2	87691	Charles Ashley Garage	Thurmond	TBD, Potentially Eligible	B-1
3	87694	May Bagoski House	Thurmond	Yes, Listed – Contributing Resource	B-1
4	87696	Harold Smith House	Thurmond	Yes, Listed – Contributing Resource	B-1
5	87713	Sidney Allen Ward House	Thurmond	Yes, Listed – Contributing Resource	B-1
6	87698	Wedzel Young House	Thurmond	Yes, Listed – Contributing Resource	B-1
7	99932	Marilyn Brown House	Thurmond	Yes, Listed – Contributing Resource	B-1
8	87702	Tom Kelly House	Thurmond	Yes, Listed – Contributing Resource	B-1
9	87708	Erskine Pugh Rental House	Thurmond	Yes, Listed – Contributing Resource	B-1
10	97097	James Humphrey Sr. House	Thurmond	Yes, Listed – Contributing Resource	B-1
11	88881	Thurmond Package Plant	Thurmond	Yes, Listed – Contributing Resource	B-1
12	87704	Thurmond Ice House	Thurmond	Yes, Listed – Contributing Resource	B-1
13	87705	McGuffin Garage	Thurmond	TBD, Potentially Eligible	B-1
14	87711	Philip A McClung/Meadows House	Thurmond	Yes, Listed – Contributing Resource	B-1
15	3361	Dun Glen Building	Dun Glen	Yes, Listed – Contributing Resource	B-1
16	3367	Dun Glen Ark	Dun Glen	Yes, Potentially Eligible	B-1
17	3369	Dun Glen Boat Storage Rack	Dun Glen	Yes, Potentially Eligible	B-1
18	3368	Dun Glen Mini Ark	Dun Glen	Yes, Potentially Eligible	B-1
19	3290	Prince Brothers' General Store	Prince	Yes, Listed	B-2
20	87583	Harrah Coal House	Harrah Site	No, Not Eligible	B-2
21	87582	Harrah Outbuilding #2	Harrah Site	No, Not Eligible	B-2
22	87581	Harrah Outbuilding #1	Harrah Site	No, Not Eligible	B-2
23	87584	Harrah Hen House	Harrah Site	No, Not Eligible	B-2

Pre-NEPA Overview Document

Remove Excess Structures, New River Gorge Park and Preserve

Structure No.	FMSS No.	Structure Name	Area/Location	Historic? / National Register Status	Figure No.
24	87585	Harrah Smokehouse	Harrah Site	No, Not Eligible	B-2
25	87604	Harrah House	Harrah Site	No, Not Eligible	B-2
26	87620	Harrah Outhouse Remains	Harrah Site	No, Not Eligible	B-2
27	237310	James K Carper Barn	Grandview	No, Not Eligible	B-2
28	87598	Cochrane Farm Outbuilding #1	Cochrane Farm	No, Not Eligible	B-3
29	87599	Cochrane Farm Outbuilding #2	Cochrane Farm	No, Not Eligible	B-3
30	88103	James Phillips Storage Building #2	Phillips Farm	No, Not Eligible	B-3
31	88104	James Phillips Farm Shed	Phillips Farm	No, Not Eligible	B-3
32	88105	James Phillips Outbuilding #1	Phillips Farm	No, Not Eligible	B-3
33	88106	James Phillips House	Phillips Farm	No, Not Eligible	B-3
34	87630	Brookside Pool Chemical Treatment Building	Camp Brookside	Yes, Eligible – Contributing Resource	B-3
35	87590	Vallandingham House (Addition only)	Vallandingham	Yes, Potentially Eligible (addition is not eligible)	B-3

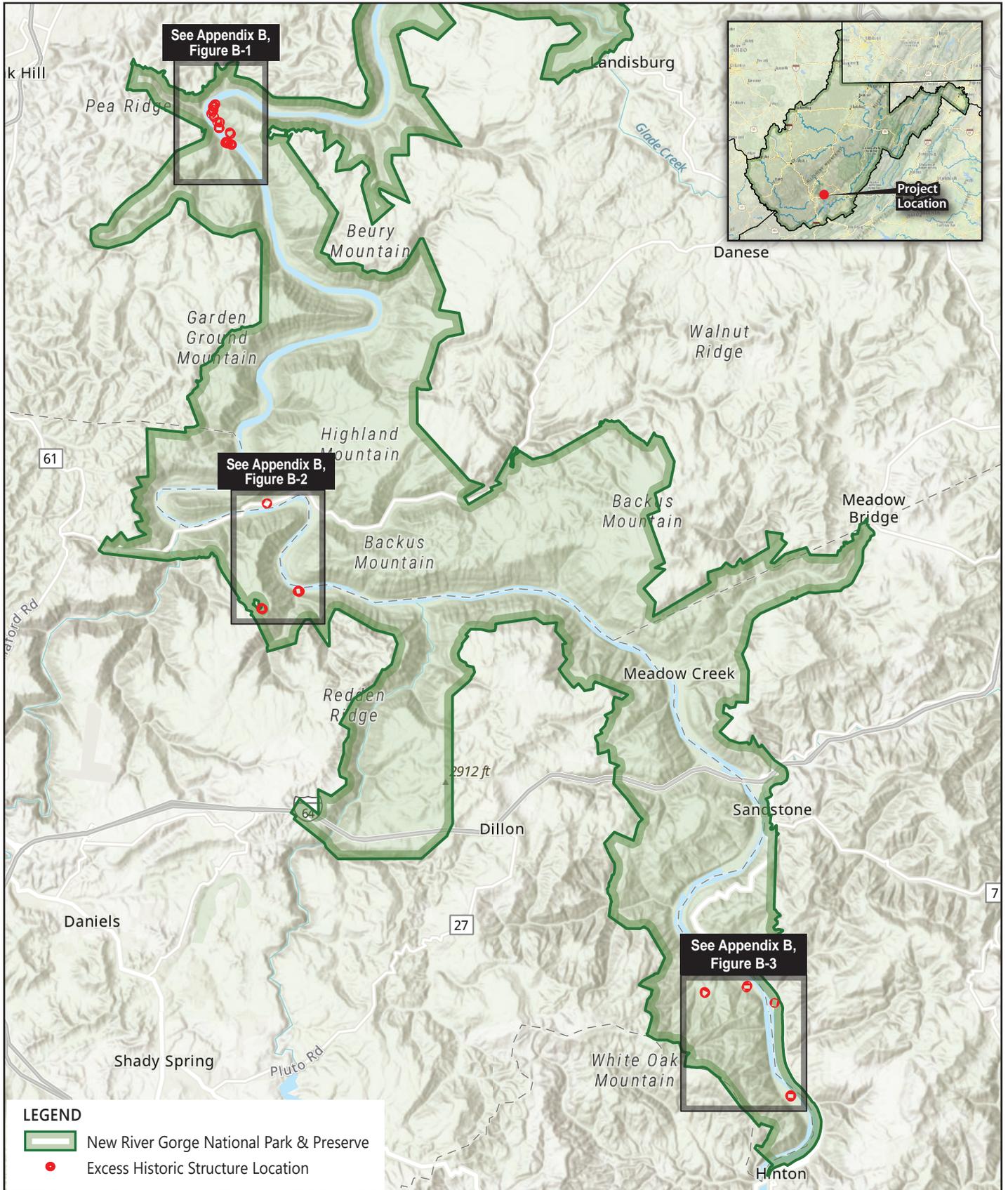


FIGURE 1

Overall Project Vicinity and Index Map

New River Gorge National Park & Preserve
 Remove Excess Structures Pre-NEPA Report
 United States Department of the Interior/National Park Service

Why is this project necessary?

The project is necessary to reduce the risk to health and safety for park employees and the public. Disrepair, collapse, and structural instability have rendered a number of structures within the park unusable and difficult to maintain. In their current state, many of the excess structures represent a risk of bodily harm to visitors and staff who interact with the structures through unauthorized entry or clambering on or in the structures. Structures in disrepair in the floodplain pose a debris risk in flood events creating additional risks to staff and the public.

Additionally, this project is necessary to reduce the maintenance burden on park resources. Several of the structures are in stable condition, and park staff are obligated to inspect the structures, repair any fixtures used to bar entry into dangerous areas, and address nuisance species issues (such as rodents). These structures are not required for the park's needs and their current function as storage buildings can be achieved using other existing structures within the park. Continuing to maintain these structures would continue to unnecessarily add to the park's ongoing operational costs.

The intent of the project is to remove the structures determined to be excess. Excess structures are defined as those structures that are not required to meet the park's needs or for the park to accomplish its mission. A structure is also considered to be excess if it has documented and extensive deficiencies such as structural damage or extensive deterioration to the point where the structure cannot be safely reused. All of the properties listed in Table 1 have been determined to be excess structures. Most of the excess structures have extensive deterioration and severe structural damage and are therefore not suitable for reuse.

Options

What options are being considered?

Option A – No Change

The no change option is continuation of the current management of these excess structures. Under this option, the currently abandoned structures would remain in place, continue to be unoccupied, and they would continue to deteriorate. Safety hazards associated with the deteriorating structures would remain. Overgrown vegetation on these structures would not be removed or maintained, and vegetation would continue to grow around and through these structures. There would continue to be no visitor access to or interpretation of these structures.

Structures that are currently being used for NPS purposes, such as storage, would continue those uses, and would continue to be generally unmaintained. Only minimal maintenance actions would occur, for example if something was broken or vandalized, or to maintain electricity to the structures.

All structures would continue to be subject to vandalism, which may cause faster deterioration. Fencing or other security measures may be needed at some structures to keep people away from the deteriorating structures, both for safety and to protect against vandalism.

Option B – Demolish Excess Structures

Under Option B, the NPS would remove the excess structures and dispose of the demolition debris properly. At the Vallandingham House, only the contemporary rear addition would be demolished, and the original log cabin would remain intact. The overgrown vegetation around the structures would be removed as necessary to provide access to the structure. Heavy equipment would be used for demolition and specific equipment would be determined by the contractor completing the demolition work.

Foundations and retaining walls associated with the excess structures would be left in place to the extent possible to minimize ground disturbance. Some foundations may be cut to ground level with below-ground remnants left in place. For most structures, ground disturbance could occur in the immediate vicinity but would be limited to previously disturbed areas. In some instances, such as for the structures in Dun Glen, associated underground utilities would be removed, resulting in additional ground disturbance. Demolition would include the removal of above ground features associated with the structure including utilities and access roads.

Because of the potential for hazardous materials to be present in the structures, a hazardous materials assessment would need to be conducted on each building prior to demolition. Hazardous materials would be addressed in accordance with NPS waste management policies (9.1.6.1 and 9.1.6.2).

During demolition, any areas that are identified as wetlands that would need to be crossed by heavy machinery would be covered with appropriate matting to prevent damage, and standard best management practices for erosion and sediment control would be used to avoid and minimize any indirect impacts to wetlands or other water bodies.

After demolition, the sites would be regraded as needed to reflect the natural conditions of the landscape and seeded and planted with native vegetation or turfgrass in accordance with park requirements.

Equipment parking and staging areas would be identified on previously disturbed areas and would be managed and maintained in a way as to prevent access by visitors.

Demolition activities would take place during the winter months to avoid the roosting period for threatened and endangered bat species as well as the migratory bird nesting season. Revegetation would take place in the spring following the demolition activities.

Resources Considered

The NPS has carefully gone through internal scoping of the current and future conditions of various resources that could potentially be affected by the project options being considered. These resources are documented in Table 2 below. The NPS identified historic structures and historic district issues for further consideration and completed a preliminary impact analysis on those resources. The NPS identified other resources for further consideration where additional information is needed: archeological resources, ethnographic resources, and adjacent communities. Additional information will be gathered on those resources through the planning and civic engagement process to determine how the options being considered would impact those resources.

As a general rule, issues should be retained for consideration and discussed in detail if:

- Environmental impacts associated with the issue are central to the proposal or of critical importance;
- A detailed analysis of environmental impacts related to the issue is necessary to make a reasoned choice between alternatives;
- Environmental impacts associated with the issue are a significant point of contention among the public or other agencies; or
- There are potentially significant impacts to resources associated with the issue.

If none of the conditions above apply to an issue, the resource concern is recommended to be rejected for further consideration (NPS 2015).

Table 2. Resources Considered

<i>Resource/Concern and Potential Effects</i>	<i>Recommendation for Further Consideration</i>
<p>Visitor Use and Experience</p> <p>Resource Presence: Opportunities for visitor recreation are in the vicinity of portions of the project area.</p> <p>Issue: Noise and visibility of demolition work and equipment. Increased traffic or limited access around demolition work and sites. Post-demolition recreational use of sites.</p> <p>Impact: Noise and visual impacts during demolition activities; potential changes to visitor recreation patterns post demolition.</p> <p>Known Information: Visitor use primarily occurs during summer months, with peak visitation during July. Other high visitation months are during May and October. Park usage is focused primarily on trail and river usage. The structures proposed for demolition are scattered throughout the park in different use areas. None of the structures proposed to be demolished are accessible to visitors, and there would be no loss of recreational opportunities. There could be the potential for additional recreational opportunities after demolition with the gained open space, particularly in the Dun Glen area near the boat launch.</p> <p>Demolition (e.g., use of heavy machinery, presence of work crews) would temporarily increase noise within the vicinity of visitor use areas. Similarly, visitors would see demolition equipment when in the vicinity, which would temporarily alter the view of the visitor use areas. These impacts would be temporary and only last the duration of demolition and revegetation activities. Permanent noise levels would be similar to current conditions and would not add to baseline conditions.</p> <p>Because demolition activities would be timed to avoid roosting seasons for sensitive species, the majority of the deconstruction work would occur at non-peak park usage times. While visitors may experience higher than normal traffic and may experience some short delays to accommodate demolition vehicles, it is not expected that these impacts will noticeably reduce visitor use or experience of the park as a whole.</p>	<p>Additional Surveys or Information to be Developed: No additional information is required.</p> <p>NEPA Recommendation: No further consideration of visitor use and experience is recommended. Limiting demolition activities to non-peak visitor months would reduce the impacts to visitor use and experience within the park. Post-demolition impacts on visitor use are expected to be minimal and may be mitigated as described under Historic Structures below.</p> <p>Suggested Mitigation:</p> <ul style="list-style-type: none"> • Limit demolition activities to weekday daylight hours. • Schedule interpretive programs when demolition is not being done, such as weekends. • Implement standard noise abatement measures during demolition.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
<p>Historic Structures</p> <p>Resource Presence: Historic structures are present within the proposed project area.</p> <p>Issue: Demolition of structures and associated infrastructure.</p> <p>Impact: Loss of historic structures.</p> <p>Known Information: A historic resource survey was conducted in 2022 to document the structures proposed for demolition (Bratslavsky Consulting Engineers and Aurora Research Associates LLC 2022). Historic properties within the project area were evaluated using the National Register criteria for significance and integrity, based on the historic context prepared for the project area. The structures located within the Thurmond Historic District are considered to be contributing resources to that district. Several structures were already listed or determined eligible for listing in the National Register including the Dun Glen Building, Prince Brothers’ General Store, and the Camp Brookside Pool Chemical Treatment Building. The Dun Glen Ark, Mini Ark, and Boat Storage Rack are potentially eligible for their association with the statewide whitewater rafting industry. The Vallandingham House is a significant example of an 18th century farmstead, despite the alterations and rear addition. The remainder of the structures evaluated were found to be not historically significant or have lost their historic integrity due to poor condition.</p> <p>Structures in the project area have received minimal or no maintenance and rehabilitation and as a result have fallen into a general state of disrepair. Absent significant investment into the rehabilitation of the structures, it is anticipated that the structures will continue into further disrepair and eventually lose their status as eligible, potentially eligible, or contributing elements to the historic district. At this time, except as noted, no funding is available to halt or reverse this trend. While the demolition will result in the loss of historic structures, this is consistent with the anticipated trends for these resources.</p>	<p>Additional Surveys or Information to be Developed: Consultation with the State Historic Preservation Office, Tribes, and other interested parties under Section 106 of the National Historic Preservation Act is underway to determine if there would be additional impacts and if mitigation measures are appropriate.</p> <p>NEPA Recommendation: Historic structures are recommended for further consideration and impact analysis in the NEPA phase of the project. The loss of historic structures would be considered an adverse impact and further analysis is needed to determine if that impact would be significant. A preliminary impact analysis on historic structures is provided in this document.</p> <p>Suggested Mitigation:</p> <ul style="list-style-type: none"> • Foundations of the structures would remain in place where possible, which could identify the historic location of the lost structures.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
<p>Historic Districts</p> <p>Resource Presence: The Thurmond Historic District is present within the proposed project area.</p> <p>Issue: Demolition of contributing resources to the Thurmond Historic District.</p> <p>Impact: Loss of contributing resources.</p> <p>Known Information: The Thurmond Historic District is located along the New River in a remote area in the heart of the New River Gorge. The district is historically significant for its association with the Chesapeake and Ohio (C&O) Railroad and the coal mining industry during the late 19th and early 20th centuries. Thurmond served as the railroad center on the C&O Railroad transporting coal to and from the coal fields of Southern West Virginia. The Thurmond Historic District was listed in the National Register in 1984; the listing included the entire town on the northwest side of the New River. In 2001, a Cultural Landscape Inventory recommended the boundary of the historic district be expanded to include the Dun Glen area and Southside Junction located on the southern bank of the New River (NPS 2001).</p> <p>The historic district within the project area has been maintained to the extent possible with available staff and funding levels. Some of the structures within the district have fallen into a state that is beyond repair or rehabilitation. Some structures within the historic district, however, such as the Thurmond Depot Visitor Center, have been restored and rehabilitated through individual projects. Future projects are planned to restore and rehabilitate additional structures such as those along Commercial Row. These projects have and will restore historic integrity to the historic district through restoration of structures that represent the district during its period of significance. Many other structures in the historic district have received minimal or no maintenance or rehabilitation and as a result have fallen into a general state of disrepair. Absent significant investment into the rehabilitation of these structures, it is anticipated that the structures will continue into further disrepair and eventually lose their status as contributing resources to the historic district. At this time, except as noted, no funding is available to halt or reverse this trend. While the demolition will result in the loss of contributing resources within the historic district, this is consistent with the anticipated trends for these resources.</p>	<p>Additional Surveys or Information to be Developed: Consultation with the State Historic Preservation Office, Tribes, and other interested parties under Section 106 of the National Historic Preservation Act is underway to determine if there would be additional impacts and if mitigation measures are appropriate.</p> <p>NEPA Recommendation: Historic districts are recommended for further consideration and impact analysis in the NEPA phase of the project. The loss of structures within historic districts would be considered an adverse impact and further analysis is needed to determine if that impact would be significant. A preliminary impact analysis on historic districts is provided in this document.</p> <p>Suggested Mitigation:</p> <ul style="list-style-type: none"> • Use of standard NPS best management practices for demolition and revegetation. • Foundations of the structures would remain in place, which would identify the historic location of the lost structures.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
<p>Archeological Resources</p> <p>Resource Presence: Archeological resources are present within the vicinity of the proposed project area.</p> <p>Issue: Ground disturbance for demolition activities and equipment staging.</p> <p>Impact: Archeological resources could be disturbed and potentially lost.</p> <p>Known Information: An archeological survey was conducted in 2023 to identify any archeological sites within the vicinity of the project area and recommend additional testing or avoidance strategies where appropriate (The Ottery Group 2023). This survey identified archeological sites within the vicinity of a few of the excess structures proposed for demolition. These sites consisted of pre-contact Native American components as well as sites dating from the mid-19th to the early 20th centuries. In most cases, the archeological resources identified appear to be associated with the excess structure in proximity. There were no significant archeological deposits found in the vicinity of the rest of the excess structures, and no additional testing was recommended prior to demolition activities for these structures.</p> <p>Based on the results and recommendations of the survey, known archeological resources can be avoided in locations where demolition activities would take place. Ground disturbance would be limited to previously disturbed areas in the immediate vicinity of the excess structures, and foundations of structures would remain in place.</p>	<p>Additional Surveys or Information to be Developed: No additional survey or information is required.</p> <p>NEPA Recommendation: No further consideration is recommended. Ground disturbance in the location of known archeological resources will be avoided, and an archeological monitor will be present during ground-disturbing activities when appropriate. Therefore, no impacts on archeological resources are anticipated.</p> <p>Suggested Mitigation:</p> <ul style="list-style-type: none"> • Use of standard NPS best management practices for demolition and revegetation. • Foundations and retaining walls below ground will be left in place. • Archaeological monitoring will be required during ground-disturbing activities. • An Inadvertent Discovery Plan will be in place in the event that archeological resources are encountered during demolition activities.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
<p>Ethnographic Resources</p> <p>Resource Presence: Ethnographic resources are likely present within the proposed project area.</p> <p>Issue: Disturbance to natural and cultural features that comprise ethnographic resources.</p> <p>Impact: Ethnographic resources could be disturbed and potentially lost.</p> <p>Known Information: Early people are known to have inhabited the area that includes the park starting about 10,000 to 15,000 years ago. These people subsisted on hunting, fishing, and gathering nuts, berries, and plants. Agricultural and crop cultivation was introduced to their lifestyle about 6,000 years ago. Eventually, communities and farming villages were developed along major waterways such as the New River. Land use, waterways, plants, and animals native to the park and surrounding area were important parts of the lifeways of indigenous people.</p> <p>The park contains sites, structures, landscapes, and objects including plant and animal resources that are important to the non-recreational uses of traditionally associated peoples. The ethnographic resources of traditionally associated peoples include religious, subsistence, and ritualized cultural practices, music, and stories about significant events in the park.</p> <p>Additional research will be conducted and engagement with traditionally associated peoples will be continued during the planning process to understand these ethnographic resources including their existing conditions, trends, and how they may be affected by this project. See Appendix C for a bibliography of sources available for this ongoing research.</p>	<p>Additional Surveys or Information to be Developed: Additional research will be undertaken to understand the types of ethnographic resources present within the proposed project area. See Appendix C for a bibliography of sources available for this ongoing research.</p> <p>Continued consultation with traditionally associated Tribes will be undertaken to gather additional information on the character, significance, and trends of the ethnographic resources.</p> <p>NEPA Recommendation: Further consideration of ethnographic resources is recommended because there is not currently enough information known to determine how the project might affect ethnographic resources.</p> <p>Suggested Mitigation:</p> <ul style="list-style-type: none"> • Use of standard NPS best management practices for demolition and revegetation • Other mitigation to be determined.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
<p>Adjacent Communities</p> <p>Resource Presence: Adjacent communities are present near the project area.</p> <p>Issue: Removal of structures important to residents of adjacent communities. Noise and visibility of demolition activities near residences.</p> <p>Impact: Loss of community resources. Disturbance to residents during demolition activities. Change in appearance of the project area after project implementation.</p> <p>Known Information: Several structures, including those in Thurmond, Dun Glen, Vallandingham, Carper Barn, Prince Brothers General Store, Camp Brookside, and the Cochrane Farm, are within close proximity to residential communities. In particular, residents continue to live within Thurmond, adjacent to some of the structures proposed for demolition.</p> <p>Demolition (e.g., use of heavy machinery, presence of work crews) would temporarily increase noise within the vicinity of these adjacent communities. Permanent noise would be similar to current conditions and would not add to baseline conditions.</p> <p>Residences and communities continue to be located adjacent to the project area and are in some instances in close proximity to excess structures proposed for demolition. It is anticipated that these residences and communities will remain for the foreseeable future. Absent significant investment into the rehabilitation of these structures, it is anticipated that the structures will continue into further disrepair and may pose safety hazards for nearby residents. Additionally, deteriorating structures would continue to attract more nuisance animals such as rodents, which could pose health hazards to nearby residents.</p> <p>Some of the residents may have community or familial ties to the excess structures proposed for demolition. Engagement with the public during the planning process is needed to understand what the impacts may be on these residents and adjacent communities.</p>	<p>Additional Surveys or Information to be Developed: Engagement with the public and residents of adjacent communities is required to gather additional information on the importance of these structures.</p> <p>NEPA Recommendation: Further consideration of adjacent communities is recommended because there is not currently enough information known about the resource to determine how the project might affect adjacent communities.</p> <p>Suggested Mitigation:</p> <ul style="list-style-type: none"> • Demolition activities would be limited to weekday daylight hours. • Implement standard noise abatement measures during demolition. • Use of standard NPS best management practices for demolition and revegetation.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
<p>Floodplains</p> <p>Resource Presence: The project area resides within the 100 and 500 year floodplains for the New River and Big Lick Run.</p> <p>Issue: Removal of structures, exposure of soils during demolition activities and prior to revegetation.</p> <p>Impact: Reduction in potential debris in flooding. Increased erosion/sedimentation during demolition activities.</p> <p>Known Information: Historically, West Virginia has been susceptible to flooding due to the nature of the topography in the area. The park is situated with the New River and several tributaries running centrally through its boundary. This project would remove structures from the floodplain, reducing the risk of loss of property during a flood event and slightly increasing the capacity of natural floodwater storage.</p> <p>Due to climate trends, extreme weather events, such as the catastrophic flooding event that occurred in 2016, will likely increase in frequency and intensity. Absent significant investment into the rehabilitation of these structures, it is anticipated that the structures will continue into further disrepair and continue to be at risk of potential loss due to these increased storm events, with an associated risk of potential debris impacts.</p>	<p>Additional Surveys or Information to be Developed: No additional information is required.</p> <p>NEPA Recommendation: No further consideration is recommended. Removing the structures and revegetating the area would have a beneficial impact on floodplains by restoring more natural flooding and drainage patterns and removing the risk of flood damage to the structures.</p> <p>Suggested Mitigation:</p> <ul style="list-style-type: none"> • Use of standard NPS best management practices during demolition. • Implementing erosion and sediment control measures during demolition activities such as silt fences, sediment basins, and erosion control blankets.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
<p>Wetlands</p> <p>Resource Presence: Wetlands are present within the vicinity of the project area. Four locations in the project area contain wetlands, including the shoreline of the New River at Thurmond and Dun Glen, as well as a section of Mill Creek at the Harrah Homestead. There is one small linear wetland system in the Phillips Farm area.</p> <p>Issue: Pollutants entering the wetland due to erosion and runoff.</p> <p>Impact: Rutting and compacting of wetlands from heavy equipment during demolition. Sedimentation entering wetlands.</p> <p>Known Information: Riverine and vegetated wetlands make up small percentages of the park overall. A wetland delineation was completed in 2023 to identify wetlands within the project area and determine the principal functions and values of any newly identified wetlands (VHB 2023). Within the project area, the New River is located within close proximity to several of the structures proposed for demolition, including the Thurmond Ice House and Package Plant and the Dun Glen Ark, Mini Ark, and Boat Storage Rack. Mill Cree is located in close proximity to the structures at the Harrah Homestead. A vegetated drainageway is located next to two structures at the Phillips Farm: the Storage Building #2 and Outbuilding #1. For this drainageway, the principal functions and values are wildlife habitat and uniqueness/heritage (VHB 2023).</p> <p>Demolition activities would not take place within any wetlands; however, equipment access may require traveling across known streams and other wetlands. The use of timber matting to limit equipment entering the wetland would minimize any potential impacts during access. Proper erosion and sediment control measures during and after demolition activities would prevent pollutants from entering the wetlands. After demolition, the sites would be restored with native vegetation, and there would be no loss of wetlands or their functions and values. Wetlands throughout the park are currently healthy, and that trend is expected to continue. The project is not expected to alter trends for the currently healthy wetland resources within the park.</p>	<p>Additional Surveys or Information to be Developed: No additional information is required.</p> <p>NEPA Recommendation: No further consideration is recommended because with the implementation of standard best practices for demolition, impacts to wetlands are expected to be avoided.</p> <p>Suggested Mitigation:</p> <ul style="list-style-type: none"> • Use of standard NPS best management practices for demolition. • Clearly marking the boundaries of the wetland on demolition plans and in the field. • Establishing buffer zones around the wetland to prevent direct impact from demolition activities. • Implementing erosion and sediment control measures during demolition and access activities, such as silt fences, sediment basins, and erosion control blankets to prevent sediment from entering the wetlands.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
<p>Water Quality</p> <p>Resource Presence: The New River and several tributaries run through the length of the park.</p> <p>Issue: Non-point source pollution from ground disturbance and equipment use during demolition activities.</p> <p>Impact: Increased non-point source runoff.</p> <p>Known Information: With the New River as the central feature of the park, many of the water quality issues originate outside of the park boundaries. Most of the pollution issues are impairments related to low pH, aluminum, iron, and fecal coliform that are from both permitted and non-permitted sources outside of the park, including wastewater treatment facilities and agriculture. Conditions for water quality for the New River and tributaries are expected to decline due to continued impairment by human sources of pollution (NPS 2018). This project is not expected to alter this trend and is not expected to contribute any non-point source pollution due to the use of best management practices for sediment and erosion control during demolition.</p>	<p>Additional Surveys or Information to be Developed: No additional information is required.</p> <p>NEPA Recommendation: No further consideration is recommended because with the implementation of standard best practices for demolition, impacts to water quality are expected to be avoided.</p> <p>Suggested Mitigation:</p> <ul style="list-style-type: none"> • Use of standard NPS best management practices for demolition. • Implementing erosion and sediment control measures during demolition activities such as silt fences, sediment basins, and erosion control blankets.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
<p>Threatened and Endangered Species</p> <p>Resource Presence: There are three federally listed bat species (Indiana bat [<i>Myotis sodalist</i>], northern long-eared bat [<i>Myotis septentrionalis</i>], and Virginia big-eared bat [<i>Corynorhinus townsendii virginianus</i>]) and one proposed species (tri-colored bat [<i>Perimyotis subflavus</i>]) that may occur within the project area. The West Virginia Species of Concern, Allegheny woodrat (<i>Neotoma magister</i>) is known to occur within the project area. A rare plant species survey conducted by the NPS in 2022 and 2023 found no rare plant species within the vicinity of the project area (Manning 2023).</p> <p>Issue: Potential endangered and threatened bat habitat in abandoned structures.</p> <p>Impact: Potential loss of individuals and habitat of abandoned structures.</p> <p>Known Information: The park represents core habitat for the Allegheny woodrat, which inhabits rocky slopes and cliff areas in West Virginia. Allegheny woodrats have been surveyed and monitored in the park since 2001. While they have declined in other parts of their range, the population in the park is stable.</p> <p>Bat assessment surveys conducted in 2023 identified evidence of transient roosting bat presence in four structures: the Vallandingham House, James K. Carper Barn, McClung/Meadows House, and the Wedzel Young House. No evidence of bat colonies was observed in any of the structures surveyed (Weldon 2023). Of the federally listed species, only the Virginia big-eared bat has been observed roosting in buildings in West Virginia. The other species are not suspected to use buildings in the state (personal communication, Curtis Roth, USFWS, WV Field Office, 11/30/2023).</p> <p>Bat species occurring in the park are threatened by white-nose syndrome, which is a fatal disease in bats caused by the fungus <i>Pseudogymnoascus destructans</i>. The disease was first discovered in New York in the winter of 2006. Since then, it has spread to more than half of the United States, killing millions of bats—up to 99% of some bat colonies. White-nose syndrome was first recorded in the park in 2011, and the decline was most pronounced in <i>Myotis</i> species and the tri-colored bat (NPS 2018). White nose syndrome continues to be a threat for these bat species and that trend is expected to continue. As the excess structures deteriorate over time, they continue to provide potential roosting habitat for the Virginia big-eared bat.</p>	<p>Additional Surveys or Information to be Developed: Additional information is required to determine the presence of federally listed bat species within the structures prior to demolition, such as acoustic surveys or guano DNA analysis.</p> <p>NEPA Recommendation: No further consideration is recommended because demolition activities would be scheduled to avoid the sensitive roosting period for federally listed bat species, which would avoid adverse impacts on these species.</p> <p>Suggested Mitigation:</p> <ul style="list-style-type: none"> • Use of standard NPS best management practices for demolition and revegetation. • Conduct guano DNA analysis prior to demolition activities to determine the presence of federally listed bat species within the excess structures. • Avoid demolition and any tree removal activities during the roosting period for bat species, April 1 to November 15. • Avoid demolition from May 1 to September 30 to minimize disturbance to Allegheny Woodrats that are known to occupy structures in the project area.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
<p>Migratory Birds</p> <p>Resource Presence: The forests within the vicinity of the project area provide habitat for populations of migratory birds (NPS 2018).</p> <p>Issue: Vegetation clearing for demolition activities.</p> <p>Impact: Loss of migratory bird nests.</p> <p>Known Information: The New River Gorge is globally significant in providing critical habitat for neotropical migratory birds, especially wood warblers. Rare species of concern with breeding populations include Swainson’s warbler (<i>Limnothlypis swainsonii</i>), golden-winged warbler (<i>Vermivora chrysoptera</i>), Kentucky warbler (<i>Geothlypis formosa</i>), worm-eating warbler (<i>Helmitheros vermivorum</i>), wood thrush (<i>Hylocichla mustelina</i>), and Cerulean warbler (<i>Setophaga cerulea</i>) (NPS 2011). Habitat suitable for protected migratory bird species is likely present within the vicinity of the project area, particularly in forested areas.</p> <p>Forest interior birds, including many neotropical wood warblers are threatened by loss of forest habitat and forest fragmentation, particularly along waterways and in upland forests. Those threats apply at the landscape scale outside of the park; forests within the park are protected and recovering from historical disturbance and fragmentation. Over a 12-year monitoring period (2007 to 2019) for 68 breeding bird species within the park’s streamside bird community, populations of 62% of species were stable or increasing, while 38% of species declined (Marshall 2021). This project is not expected to alter this trend. The areas to be disturbed for demolition activities would be relatively small when compared to the overall available habitat within the park. Restoration of the disturbed area with native vegetation after demolition is complete may improve and restore habitat for migratory birds.</p>	<p>Additional Surveys or Information to be Developed: No additional information is required.</p> <p>NEPA Recommendation: No further consideration is recommended because demolition activities would be scheduled to avoid the sensitive nesting period for migratory birds, which would avoid adverse impacts on these species.</p> <p>Suggested Mitigation:</p> <ul style="list-style-type: none"> • Use of standard NPS best management practices for demolition and revegetation. • Avoid grubbing and clearing shrubs and other vegetation during the migratory bird nesting season (March through August).

Resource/Concern and Potential Effects	Recommendation for Further Consideration
<p>Vegetation and Wildlife</p> <p>Resource Presence: Vegetation and indicators of wildlife are present within the proposed project area.</p> <p>Issue: Clearing and grubbing from demolition activities.</p> <p>Impact: Loss of native vegetation and wildlife habitat.</p> <p>Known Information: The forests and plant communities in the project area support a diverse community of plant species, diverse breeding bird communities, and a rich assemblage of mammals. Common species within the project area include oaks (<i>Quercus</i> spp.), maples (<i>Acer</i> spp.), tulip-poplar (<i>Liriodendron tulipifera</i>), Red-eyed Vireo (<i>Vireo olivaceus</i>), Scarlet Tanager (<i>Piranga olivacea</i>), white-tailed deer (<i>Odocoileus virginianus</i>), and Virginia opossum (<i>Didelphis virginiana</i>) (NPS 2018).</p> <p>Many of these vegetation and wildlife resources in the park are in a declining trend in condition to some degree due to habitat threats such as forest fragmentation, emerging forest pests and pathogens, and invasive plant species growth; these trends are expected to continue (NPS 2018). This project is not expected to alter the trends related to vegetation and wildlife. Best management practices would minimize impacts on vegetation and wildlife within the project area, and revegetation after demolition activities are complete would provide additional habitat for some species.</p>	<p>Additional Surveys or Information to be Developed: No additional information is required.</p> <p>NEPA Recommendation: No further consideration is recommended because with the implementation of standard best practices for demolition, impacts on vegetation and wildlife are expected to be temporary and minimal.</p> <p>Suggested Mitigation:</p> <ul style="list-style-type: none"> • Use of standard NPS best management practices for demolition and revegetation. • Implementing erosion and sediment control measures during demolition activities such as silt fences, sediment basins, and erosion control blankets to prevent pollutants from entering aquatic habitat. • Use the minimum size equipment necessary during demolition activities to minimize the area of disturbance. • Planting of native species once demolition is completed to restore natural conditions.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
<p>Exotic and Invasive Species</p> <p>Resource Presence: Exotic and invasive plant species are present within the proposed project area.</p> <p>Issue: Ground disturbance and equipment used during demolition activities.</p> <p>Impact: Increased the presence and spread of exotic and invasive species.</p> <p>Known Information: The project area has substantial nonnative invasive plant infestations. Invasive plants observed within the project area include (but are not limited to) Japanese knotweed (<i>Polygonum cuspidatum</i>), tree of heaven (<i>Ailanthus altissima</i>), Asiatic bittersweet (<i>Celastrus orbiculatus</i>), Chinese yam (<i>Dioscorea polystachya</i>), multiflora rose (<i>Rosa multiflora</i>), Japanese honeysuckle (<i>Lonicera japonica</i>), and wineberry (<i>Rubus phoenicolasius</i>) (Manning 2023). Invasive species occur most frequently in certain areas of the park including disturbed areas such as recovering mined lands and along the riparian corridor of the New River and its tributaries.</p> <p>These nonnative species compete with native plant species, dramatically change plant communities, and degrade wildlife habitat. Since invasive plants are inherently difficult to control, the management of these species and their effects on park vegetation is challenging. However, as documented in the park’s 2020 Invasive Plant Species and Habitat Management Plan, more than half (55%) of the park’s forest health monitoring plots contain no invasive plant species, and the park-wide average cover of invasive plants is low (1.8%). Where invasive species do occur in the park, they are slowly spreading, by 0.1% cover per year (NPS 2020). It is anticipated that nonnative invasive plants will continue to pose a threat to natural communities in the project area and this project is not expected to alter this trend. The project area will be revegetated with native species or turfgrass following demolition.</p>	<p>Additional Surveys or Information to be Developed: No additional information is required.</p> <p>NEPA Recommendation: No further consideration is recommended because with the implementation of standard best practices for demolition, project-related impacts from exotic and invasive species are expected to be minimized.</p> <p>Suggested Mitigation:</p> <ul style="list-style-type: none"> • Use of standard NPS best management practices for demolition and revegetation. • Inspection and cleaning of demolition equipment prior to entering the Park. • Develop and implement an exotic and invasive species management plan during demolition. • Treat invasive species before and after demolition activities to limit continued growth. • Restore all areas disturbed from demolition and structure removal activities with native vegetation.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
<p>Hazardous Materials</p> <p>Resource Presence: Hazardous materials such as asbestos and lead-based paint may be present within the structures to be demolished.</p> <p>Issue: Contractor and NPS staff exposure to hazardous materials.</p> <p>Impact: Contractor and employee exposure to hazardous materials during demolition activities.</p> <p>Known Information: Hazardous materials such as asbestos and lead-based paint may be present in some structures. Demolition activities can disturb these materials and can expose contractors and NPS employees working in the vicinity of the materials. Proper identification, removal, and disposal of these materials is needed to avoid exposure and impacts related to hazardous materials. A pre-demolition hazardous material survey was performed in the project area in September and October of 2023 (GWVO 2023).</p> <p>Absent significant investment into the rehabilitation of these structures, it is anticipated that the structures will continue into further disrepair and hazardous materials such as lead-based paint and asbestos could be released into the environment. Proper removal and disposal of hazardous materials for this project would limit the release of these materials.</p>	<p>Additional Surveys or Information to be Developed: No additional information is required.</p> <p>NEPA Recommendation: No further consideration is recommended because with the implementation of standard best practices for demolition, project-related impacts from removal of hazardous materials are expected to be avoided.</p> <p>Suggested Mitigation:</p> <ul style="list-style-type: none"> • Use of standard NPS best management practices for demolition. • Hazardous materials would be addressed in accordance with NPS waste management policies. • Proper removal and disposal of hazardous materials prior to demolition activities. • Asbestos and lead-based paint testing of building materials prior to demolition.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
<p>Air Quality</p> <p>Resource Presence: Air quality is protected and monitored within the Park.</p> <p>Issue: Ground disturbance and equipment use from demolition activities.</p> <p>Impact: Increased pollutant emissions and airborne sediment.</p> <p>Known Information: The project area is not in a non-attainment or maintenance area for any National Ambient Air Quality Standards (NAAQS) pollutants. Demolition activities would require the use of heavy machinery and equipment that would emit air pollutants through exhaust and produce particulate matter (dust). This would temporarily reduce air quality in the immediate area, but would not impact air quality long term. While air quality trends in the project area are unknown, conditions for air quality indicators such as ozone and sulfur and nitrogen deposition are of moderate to significant concern (NPS 2018). This project is not expected to alter any trends in air quality and is not expected to contribute a noticeable level of pollution to air quality in the park or vicinity.</p>	<p>Additional Surveys or Information to be Developed: No additional information is required.</p> <p>NEPA Recommendation: No further consideration is recommended because with the implementation of standard best practices for demolition, project-related impacts to air quality are expected to be avoided.</p> <p>Suggested Mitigation:</p> <ul style="list-style-type: none"> • Use of standard NPS best management practices for demolition and revegetation. • Dust control management during demolition activities. • Minimize ground disturbance and the frequency of vehicle traffic during high wind events. • Temporary and permanent stabilization that meets NPS structural engineering and design standards for all disturbed areas during demolition. • Demolition equipment will be well-maintained and use the cleanest fuels possible.

Past, Present, and Reasonably Foreseeable Actions

Other past, present, and reasonably foreseeable actions have the potential to result in cumulative impacts on park resources. Cumulative impacts are defined as the “effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (federal or non-federal) or person undertakes such other actions.” (40 CFR 1508.1[g]). A summary of other past, present, and reasonably foreseeable actions that may result in cumulative impacts is below, and a discussion of those cumulative impacts is under each resource heading below.

Restoration of the Thurmond Depot. In 2023, the NPS conducted restoration work on the historic Thurmond Depot, including preservation and repair of windows, doors, and wood siding. Failing paint was removed and a new paint coat was applied to create a cohesive appearance of the historic fabric of the structure. The depot was originally constructed in 1904 and served as a major stopping point for freight along the Chesapeake and Ohio Railroad during the early 20th century. The structure was rehabilitated into a visitor center for the park in 1995 and continues to serve as an active railroad passenger stop.

Deferred Maintenance of Key Cultural Resources and Failing Wastewater/Water Systems. The NPS is currently in the planning and design process for a project to stabilize and rehabilitate key historic structures in Thurmond, upgrade water and wastewater systems throughout the park, optimize and reimagine Dun Glen’s site circulation and boat launch area, provide accessible paths to existing structures where feasible, and update existing restroom facilities throughout the park.

In Thurmond, this project will include improving the drainage patterns through use of a gutter system at Commercial Row to redirect stormwater away from the historic buildings to prevent further water infiltration. This project will stabilize the following structures within the Thurmond to prevent further deterioration and allow future rehabilitation and use of the structures: the National Bank of Thurmond, the Goodman-Kincaid Building, and the Mankin-Cox Building comprising Commercial Row as well as the Fatty Lipcomb, McClung, and McGuffin Houses on the hillsides.

At Dun Glen, the circulation will be improved to enhance the visitor experience by separating public day-use spaces from NPS staff and maintenance areas. The public circulation route through the maintenance yard will be eliminated, and a turnaround will be added at the boat launch to prevent private vehicles from entering the NPS maintenance area. Public day-use facilities will be improved, and accessible routes will be created. The desired future use of Dun Glen, as envisioned by the 2009 New River Gorge General Management Plan, is as a riverside day use area with most buildings removed from the floodplain. This desired future condition will help align the area with NPS floodplain policy, which supports removing structures from flood-prone areas and restoring natural beneficial floodplain functions.

Remove Non-Historic Structures. The NPS is undertaking a project to demolish 16 non-historic excess structures across the park. The project includes removing hazardous structures, disposing of all associated building debris, and restoring the sites to a condition consistent with their natural surroundings which will provide visitors with additional recreational opportunities. The project addresses deferred maintenance needs and eliminates yearly maintenance and law enforcement costs. Many of the buildings and structures came into the possession of the NPS through land acquisition within its established boundaries; most were not intended for occupation or use and are now abandoned, dilapidated, and overgrown. The structures are safety hazards that are vulnerable to trespassing and vandalism and a burden to maintain.

Preliminary Impact Analysis

The NPS conducts detailed analyses of resource concerns recommended for further consideration to determine indirect, direct, and cumulative impacts in the foreseeable future from proposed option(s) (NPS 2015). The preliminary analysis completed thus far is based on resource concerns recommended for further consideration for which sufficient information is currently available.

Historic Structures

What is known about the historic structures in the project area?

A historic resource survey was conducted in 2022 to evaluate the excess structures proposed for demolition and determine which are considered to be historic (Bratslavsky Consulting Engineers and Aurora Research Associates LLC 2022). Historic properties within the project area were evaluated using the National Register criteria for significance and integrity, based on historic contexts prepared for the area. A summary of the historic structures and their significance and integrity is below, based on the information provided in the 2022 historic resource survey report.

The excess structures located within the Thurmond Historic District are considered to be contributing resources to that district, which was listed in the National Register in 1984. In general, these structures are former houses of different styles. The larger houses were built for the railroad managers and other professionals in the town. These houses are typically two stories and have more yard space around them. There are also a number of smaller houses built for rail yard workers and laborers. These are generally one-story, four-room structures on modest lots. These structures all retain enough historic integrity to contribute to the significance of the historic district. The Thurmond Ice House was not specifically listed in the original National Register document and was not previously evaluated for its significance or condition. The 2022 survey evaluated the structure and determined that though it has been moved from its original location, the structure contributes to the significance of the historic district and retains historic integrity. More information on the Thurmond Historic District is discussed under the heading, “Historic District” below (Bratslavsky Consulting Engineers and Aurora Research Associates LLC 2022).

Several individual structures surveyed in 2022 were already listed or determined eligible for listing in the National Register including the Dun Glen Building, Prince Brothers’ General Store, and the Camp Brookside Pool Chemical Treatment Building. The 2022 survey determined that these structures retain sufficient integrity to convey their historic significance and remain eligible for listing in the National Register. Descriptions of these buildings are below, summarized from the 2022 survey report (Bratslavsky Consulting Engineers and Aurora Research Associates LLC 2022).

The Dun Glen Building includes a portion of the former west wing of the Dun Glen Hotel, which was destroyed by fire in 1930. The structure was used as a staff building by Whitewater Expeditions Unlimited, the first white water rafting company in southern West Virginia, which was established by the Dragan brothers in 1968. The structure is listed in the National Register as a contributing resource to the Thurmond Historic District as well as for its association with the development of Dun Glen and the birth of West Virginia’s whitewater rafting industry (Bratslavsky Consulting Engineers and Aurora Research Associates LLC 2022).

The Prince Brothers General Store was constructed circa 1900 by the Prince family to replace an earlier 1872 store. The store prospered during the coal and timber boom due to its proximity to

the railroad and operated until 1984. It was listed in the National Register for its significance in commerce (Bratslavsky Consulting Engineers and Aurora Research Associates LLC 2022).

The Camp Brookside Pool Chemical Treatment Building is part of Camp Brookside, a summer camp for children of employees of the Electro Metallurgical Company that was established in 1947. The camp is eligible for listing in the National Register, and the pool chemical treatment building was determined to be a contributing resource. Although the swimming pool has since been filled, the building retains integrity and remains eligible as a contributing resource to Camp Brookside (Bratslavsky Consulting Engineers and Aurora Research Associates LLC 2022).

The Dun Glen Ark, Mini Ark, and Boat Storage Rack are potentially eligible for their association with the statewide whitewater rafting industry. These structures were part of the first commercial whitewater company established in West Virginia in 1968. These structures were constructed in the late 1970s-80s and are not yet 50 years of age. However, the 2022 survey recommended that these structures and the Dun Glen area be considered for eligibility in association with the statewide significance of the whitewater rafting industry. Dun Glen was the birthplace of the New River Gorge's whitewater rafting industry and was developed as part of West Virginia's emerging recreation and tourism industries. Whitewater rafting companies continue to use the Dun Glen area to launch guided rafting trips and tell visitors about the history of Thurmond and Dun Glen. Therefore, the structures at Dun Glen are considered to be potentially eligible for listing in the National Register (Bratslavsky Consulting Engineers and Aurora Research Associates LLC 2022).

The Vallandingham House was previously determined to be not eligible due to the substantial alteration of the rear addition. However, the structure was reevaluated during the 2022 survey and was recommended as eligible as a significant example of 18th century log cabin construction. Because the rear addition is reversible and does not change the main façade of the structure, and because of the presence of several outbuildings with good integrity, the structure retains enough historic integrity to convey its significance as an example of an 18th century farmstead. Therefore, it is considered to be eligible for listing in the National Register (Bratslavsky Consulting Engineers and Aurora Research Associates LLC 2022).

The remainder of the structures evaluated in the 2022 survey were documented to have lost substantial historic integrity due to their poor condition, ruined states, or loss of associated property such as farm sites. These resources are considered not eligible for listing in the National Register (Bratslavsky Consulting Engineers and Aurora Research Associates LLC 2022).

What impacts are anticipated from Option A – No Change?

Under Option A, there would be no immediate change to the historic structures, and they would retain their remaining historic integrity. However, due to the poor condition of these excess structures, there would be a loss of integrity over time as these structures continue to degrade and eventually collapse. If left to severely degrade and fall into ruin, these structures would lose their integrity of materials, design, workmanship, feeling, and association. This loss of historic integrity would likely result in these structures no longer being eligible for listing in

the National Register, either individually or as a contributing resource to a historic district or other eligible property. Ultimately, Option A would result in the slow but eventual loss of historic structures due to neglect and decay.

What impacts are anticipated from Option B – Demolish Excess Structures?

Under Option B, there would be an immediate loss of historic integrity related to these excess structures due to their demolition. Retaining the foundations of the structures would convey the historic location of the structure, but all other aspects of integrity would be lost. The ultimate result of Option B would be the same as Option A—the loss of historic structures—but Option B would be a safer, controlled demolition of the structures.

For the structures listed in or eligible for listing in the National Register, they would no longer convey their historic significance and would no longer be eligible for listing. Removal of the historic structures within Thurmond Historic District would result in their loss of historic integrity and they would no longer contribute to the historic significance of the historic district. The removal of the Dun Glen Ark, Mini Ark, and Boat Storage Rack would result in the loss of historic resources associated with the whitewater rafting industry, a potentially important historic context.

The removal of the rear addition of the Vallandingham House would remove a contemporary addition that does not contribute to the historic significance of the farmstead. This would result in a restoration of its historic integrity of design, feeling, and association because the structure would more accurately reflect its appearance during the period of construction. The Vallandingham House would remain eligible for listing in the National Register.

Demolition of the remaining excess structures would have no effect on historic structures because they do not have enough historic integrity to be eligible for listing in the National Register. Loss of any remaining integrity of these structures would not affect any historic structures eligible for listing in the National Register.

How would impacts affect the long-term trend for historic structures in the project area?

The trend for the historic structures in the park anticipates the slow degradation of historic structures over time as a result of limited maintenance and natural processes. Under Option A, this trend will not change. Ultimately, Option A would result in a loss of historic structures due to neglect and decay. Combined with the past, present, and reasonably foreseeable actions for Option B, the impacts on historic structures would have adverse effects when several historic structures eligible for listing on the National Register are demolished. At Thurmond, these structures are generally in poor condition and have already lost some historic integrity due to the degradation. However, the stabilization and restoration of key historic structures such as the Thurmond Depot and structures along Commercial Row would ensure that representative historic structures would remain extant for the future. At Dun Glen, the historic setting of the Ark, Mini Ark, and Boat Storage Rack would be altered due to the new circulation patterns and boat launch improvements, further diminishing the historic integrity of those structures.

Removal of other non-historic excess structures would further relieve the NPS maintenance and financial burden that these excess structures present. Overall, the remaining historic structures within the park would retain their historic integrity, and park resources would be focused on maintaining and preserving the remaining historic structures.

Under Option A, there would be no change from these predicted trends.

When the impacts of Option B are combined with those of past, present, and reasonably foreseeable actions, cumulative impacts to historic structures would be adverse. This is because under Option B, the historic structures would be removed, and the loss would occur faster than if left in place. The loss of these historic structures is not expected to result in measurable impacts on the overall condition of historic structures within the park.

In conclusion, cumulative effects to historic structures would be adverse, but Option B would contribute to but would not meaningfully increase adverse cumulative impacts from the predicted resources trends.

Historic District

What is known about the historic district in the project area?

The Thurmond Historic District is located along the New River in a remote area in the heart of the New River Gorge. It is laid out in a northwest/southeast axis where the river enters a major hairpin turn. The district is historically significant for its association with the Chesapeake and Ohio (C&O) Railroad and the coal mining industry during the late 19th and early 20th centuries. Though Thurmond was extremely remote and inaccessible by means other than railroad at the time, the town had two banks, two hotels, and a thriving commercial row. Thurmond served as the railroad center on the C&O Railroad transporting coal to and from the coal fields of Southern West Virginia. The Thurmond Historic District was listed in the National Register in 1984; the listing included the entire town on the northwest side of the New River. In 2001, a Cultural Landscape Inventory recommended the boundary of the historic district be expanded to include the Dun Glen area and Southside Junction located on the southern bank of the New River (NPS 2001). Today, several residents remain living on privately-owned property within the boundaries of the Thurmond Historic District.

The town of Thurmond was developed in the late 1880s to support the C&O Railroad and the growing coal industry. The railroad was constructed in 1873 along a relatively narrow, level portion of land along the New River. A stop along the rail line was not created in Thurmond until 1889 when the bridge across the New River was constructed. This bridge allowed coal transported down the Dunloup Creek railroad branch to be transferred across the river and onto the trains of the C&O at Thurmond. Shortly after establishing the rail stop, the C&O Railroad constructed an assembly yard for rail cars at Thurmond. In response, approximately 30 houses for railroad workers were built near the tracks and along the steep slopes of the gorge. A post office and commercial district soon followed to serve the growing town (NPS 2001).

There are several different housing styles remaining in the Thurmond Historic District. The larger houses were built for the railroad managers and other professionals in the town. They are typically two stories and have more yard space around them. There are also a number of smaller houses built for rail yard workers and laborers. These residences had a couple of floorplan layouts that were typical for these structures. The most common type of worker house in Thurmond is a basic single story, square, four-room house with no hallways. A second type of worker house is a modified 4-room house with the rooms arranged linearly with hallway access. These houses were constructed with rough-sawn lumber with no insulation. The landscape structural features most pervasive in the historic district are retaining walls. These walls were necessary to stabilize the steep topography of the gorge while also providing level areas for gardens and yards. Therefore, almost every house has some type of retaining wall system. The construction materials of the walls vary from dry-laid stone, mortared stone, poured concrete and railroad ties (Harper 1984 and NPS 2001).

The period of significance for the Thurmond Historic District is 1884 to 1950, which includes the construction of the first house on the land until steam engines were replaced with diesel engines and many jobs in Thurmond were lost (Harper 1984). The Thurmond Historic District retains many features from the period of significance, such as the passenger depot, three business district buildings referred to as “Commercial Row,” some of the railroad features and many of the remaining houses. However, the majority of the railroad features used during the heyday of the coal industry have been removed. Many of the houses remaining in the Thurmond Historic District are in very poor and deteriorated condition. Other landscape features that contribute to the period of significance remain intact including the circulation system and the overall spatial organization. The circulation system primarily consists of the railroad tracks and the bridge across the river. The overall spatial organization includes the tracks and commercial district spaced linearly along the floodplain of the river with the majority of the houses perched on the hillside above. The landscape in the district has been altered dramatically since the period of significance by the growth of heavy vegetation including invasive plants such as kudzu (NPS 2001).

According to the 2001 Cultural Landscapes Inventory, the Thurmond Historic District maintains its integrity of location and setting. Thurmond is still located within the New River Gorge in its original location. Thurmond also provides a view of the steep hills of the gorge and is fairly remote. The historic district’s association with the railroad is still evident; however, its integrity of association suffers due to the loss of structures related to the railroad industry. Built with the boomtown mentality that was prevalent during the industrial period of West Virginia, most residents and business of Thurmond moved on when the industry lost its prevalence; therefore, many of the structures that existed during Thurmond’s peak have been lost. While this loss is typical of a former boomtown, it unfortunately diminishes the district’s historic integrity (NPS 2001).

What impacts are anticipated from Option A – No Change?

Under Option A, there would be no immediate change to the Thurmond Historic District. All the extant contributing resources would remain in place and the district would retain its historic

integrity and significance. However, due to the poor condition of the excess structures, there would be a loss of integrity over time as these structures continue to degrade and eventually collapse. Ultimately, Option A would result in a slow but eventual loss of historic structures that contribute to the historic significance of the district due to neglect and decay.

As these structures continue to degrade, the setting and feeling of the historic district would be diminished because its significance relates to a period of prosperity for Thurmond. Retaining a substantial number of structures that are overgrown, unmaintained, and dilapidated would not be representative of the period of significance when these structures were used as residences, rental houses, and other functions of a boomtown in its heyday. However, the historic structures located in the core along the railroad line such as Commercial Row and the historic depot would retain their historic integrity and would continue to convey the significance of the historic district and its association with the railroad and the coal industry. Therefore, the Thurmond Historic District would remain eligible for listing in the National Register under Option A.

What impacts are anticipated from Option B – Demolish Excess Structures?

Under Option B, a total of 14 historic structures would be removed from the Thurmond Historic District. Removal of these contributing resources would result in a loss of integrity of design, materials, and workmanship within the district. However, these structures are in such poor condition that much of their integrity of design and workmanship has already been lost. The overgrown, degraded, and collapsed appearance of these structures does not reflect the historic district's period of significance and does not convey its history as a boomtown. After demolition, the remaining foundations of these structures could allow the park to continue to tell the story of the former structures within the historic district, including their locations and physical relationships to the core of the historic district along the railroad. The ultimate result of Option B would be the same as Option A—the loss of contributing resources—but Option B would be a safer, controlled demolition of the structures.

Though there would be a loss of contributing structures within the historic district, many features that contribute to the significance would remain under Option B. The overall spatial organization of the district would remain, including the linear northwest/southeast axis along the New River with the commercial buildings located along the railroad tracks and the supporting dwellings located on the hillside above. Small-scale features such as retaining walls would remain in place, providing physical records of the former structures on the hillside and the structural systems that allowed construction on such steep topography to succeed. The historic circulation patterns would also remain, including the historic bridge over the New River, the railroad tracks, and the road with hairpin turns rising up the steep gorge to connect to the remaining houses. The buildings and structures that would remain within the district would continue to convey their association with the railroad and coal industry, particularly the historic depot and commercial buildings.

A reassessment of the historic district may be needed after completion of this project to determine the extent of the loss of historic integrity for the overall district; however, the

remaining historic structures would retain their historic integrity and would continue to convey the significance of the historic district and its association with the railroad and the coal industry. Therefore, the Thurmond Historic District would remain eligible for listing in the National Register under Option B.

How would impacts affect the long-term trend for historic district in the project area?

The trend for the historic district in the park anticipates the slow loss of historic integrity over time as a result of limited maintenance and natural processes degrading structures that contribute to its significance. Under Option A, this trend would not change. Ultimately, Option A would result in a loss of contributing resources due to neglect and decay. Combined with the past, present, and reasonably foreseeable actions for Option B, the impacts on the historic district would have adverse effects when several historic structures that contribute to the district's historic significance are demolished. These structures are generally in poor condition and have already lost some historic integrity due to the degradation. However, the stabilization and restoration of key historic structures such as the Thurmond Depot and structures along Commercial Row would ensure that representative structures would continue to convey the historic significance of the Thurmond Historic District. These structures chosen for stabilization and restoration are located in the core of Thurmond and are best representative of the coal industry and the importance of the railroad to the district. Removal of other non-historic excess structures would further relieve the NPS maintenance and financial burden that these excess structures present. Overall, the remaining structures within the historic district would retain their integrity and continue to convey the significance of the historic district. Park resources would be focused on maintaining and preserving the remaining structures within the historic district and ensuring the overall historic character and integrity of the district is retained.

Under Option A, there would be no change from these predicted trends.

When the impacts of Option B are combined with those of past, present, and reasonably foreseeable actions, cumulative impacts to historic districts would be adverse. This is because under Option B, several contributing historic structures within historic districts would be removed, and the loss would occur faster than if left in place. The loss of these contributing historic structures is not expected to result in measurable impacts on the overall condition of historic districts within the park.

In conclusion, cumulative effects to historic districts would be adverse, but Option B would contribute to but would not meaningfully increase adverse cumulative impacts from the predicted resources trends.

References

Bratslavsky Consulting Engineers and Aurora Research Associates, LLC

- 2022 Historic Resource Survey Final Report, NERI 237369. Prepared for the National Park Service.

GWWO, Inc.

- 2023 Pre-demolition Hazardous Material Survey, NERI 326119, Remove Excess Structures and Abandoned Buildings Parkwide.

Harper, Eugene R.

- 1984 National Register of Historic Places Inventory – Nomination Form, Thurmond Historic District.

Manning, Douglas

- 2023 GAOA- Demolition of NERI Historic and Excess Structures (PMIS 326119, PEPC 111561) Botany Survey Report.

Marshall, Matt R.

- 2021 Streamside Bird Monitoring in the Eastern Rivers and Mountains Network, New River Gorge National Park and Preserve 2007-2019. Natural Resource Report NPS/ERMN/NRR–2021/2329.

National Park Service

- 2020 Invasive Plant Species and Habitat Management Plan for New River Gorge National River. October 2020.

- 2018 Natural Resource Condition Assessment, New River Gorge National River. Natural Resource Report NPS/NERI/NRR–2018/1622.

- 2015 National Park Service NEPA Handbook.

- 2011 Foundation Plan for New River Gorge National River.

- 2001 Cultural Landscapes Inventory, Thurmond Historic District, New River Gorge National River.

Ottery Group, The

- 2023 Archeological Investigation in Support of Multiple Historic Property Demolitions, New River Gorge National Park and Preserve, Fayette, Raleigh, and Summers Counties, West Virginia, Final Report, July 2023.

VHB

- 2023 Remove Excess Historical Structures Wetland Delineation Results. Prepared for the National Park Service.

Weldon, Prescott

2023 New River Gorge National Park Bat Assessment in Structures Report. Prepared for the National Park Service.

Appendix A: List of Excess Structures

Table A-1. Excess Structures

Structure No.	FMSS No	Structure Name	Area / Location	Excess Structure?	Proposed for Demolition?	Historic Status / National Register Eligibility	Condition	Representative Photo
1	87692	Charles Ashley Outbuilding	Thurmond	Yes	Yes	TBD, Potentially Eligible	Existing	
2	87691	Charles Ashley Garage	Thurmond	Yes	Yes	TBD, Potentially Eligible	Existing	
3	87694	May Bagoski House	Thurmond	Yes	Yes	Historic, Listed - Contributing Resource	Existing	
4	87696	Harold Smith House	Thurmond	Yes	Yes	Historic, Listed - Contributing Resource	Existing	
5	87713	Sidney Allen Ward House	Thurmond	Yes	Yes	Historic, Listed - Contributing Resource	Existing	

Table A-1. Excess Structures

Structure No.	FMSS No	Structure Name	Area / Location	Excess Structure?	Proposed for Demolition?	Historic Status / National Register Eligibility	Condition	Representative Photo
6	87698	Wedzel Young House	Thurmond	Yes	Yes	Historic, Listed - Contributing Resource	Existing	
7	99932	Marilyn Brown House	Thurmond	Yes	Yes	Historic, Listed - Contributing Resource	Existing	
8	87702	Tom Kelly House	Thurmond	Yes	Yes	Historic, Listed - Contributing Resource	Existing	
9	87708	Erskine Pugh Rental House	Thurmond	Yes	Yes	Historic, Listed - Contributing Resource	Existing	
10	97097	James Humphrey Sr. House	Thurmond	Yes	Yes	Historic, Listed - Contributing Resource	Existing	

Table A-1. Excess Structures

Structure No.	FMSS No	Structure Name	Area / Location	Excess Structure?	Proposed for Demolition?	Historic Status / National Register Eligibility	Condition	Representative Photo
11	88881	Thurmond Package Plant	Thurmond	Yes	Yes	Historic, Listed - Contributing Resource	Existing	
12	87704	Thurmond Ice House	Thurmond	Yes	Yes	Historic, Listed - Contributing Resource	Existing	
13	87705	McGuffin Garage	Thurmond	Yes	Yes	TBD, Potentially Eligible	Existing	
14	87711	Philip A McClung/Meadows House	Thurmond	Yes	Yes	Historic, Listed - Contributing Resource	Existing	
15	3361	Dun Glen Building	Dun Glen	Yes	Yes	Historic, Listed - Contributing Resource	Existing	

Table A-1. Excess Structures

Structure No.	FMSS No	Structure Name	Area / Location	Excess Structure?	Proposed for Demolition?	Historic Status / National Register Eligibility	Condition	Representative Photo
16	3367	Dun Glen Ark	Dun Glen	Yes	Yes	Historic, Potentially Eligible	Existing	
17	3369	Dun Glen Boat Storage Rack	Dun Glen	Yes	Yes	Historic, Potentially Eligible	Existing	
18	3368	Dun Glen Mini Ark	Dun Glen	Yes	Yes	Historic, Potentially Eligible	Existing	
19	3290	Prince Brothers' (Monks) General Store	Prince	Yes	Yes	Historic, Listed	Existing	
20	87583	Harrah Coal House	Harrah Site	Yes	Yes	Not Historic, Not Eligible	Ruins	

Table A-1. Excess Structures

Structure No.	FMSS No	Structure Name	Area / Location	Excess Structure?	Proposed for Demolition?	Historic Status / National Register Eligibility	Condition	Representative Photo
21	87582	Harrah Outbuilding #2	Harrah Site	Yes	Yes	Not Historic, Not Eligible	Ruins	
22	87581	Harrah Outbuilding #1	Harrah Site	Yes	Yes	Not Historic, Not Eligible	Existing	
23	87584	Harrah Hen House	Harrah Site	Yes	Yes	Not Historic, Not Eligible	Existing	
24	87585	Harrah Smokehouse	Harrah Site	Yes	Yes	Not Historic, Not Eligible	Existing	
25	87604	Harrah House	Harrah Site	Yes	Yes	Not Historic, Not Eligible	Ruins	

Table A-1. Excess Structures

Structure No.	FMSS No	Structure Name	Area / Location	Excess Structure?	Proposed for Demolition?	Historic Status / National Register Eligibility	Condition	Representative Photo
26	87620	Harrah Outhouse Remains	Harrah Site	Yes	Yes	Not Historic, Not Eligible	Ruins	
27	237310	James K Carper Barn	Grandview	Yes	Yes	Not Historic, Not Eligible	Existing	
28	87598	Cochrane Farm Outbuilding #1	Cochrane Farm	Yes	Yes	Not Historic, Not Eligible	Existing	
29	87599	Cochrane Farm Outbuilding #2	Cochrane Farm	Yes	Yes	Not Historic, Not Eligible	Existing	
30	88103	James Phillips Storage Building #2	Phillips Farm	Yes	Yes	Not Historic, Not Eligible	Existing	

Table A-1. Excess Structures

Structure No.	FMSS No	Structure Name	Area / Location	Excess Structure?	Proposed for Demolition?	Historic Status / National Register Eligibility	Condition	Representative Photo
31	88104	James Phillips Farm Shed	Phillips Farm	Yes	Yes	Not Historic, Not Eligible	Ruins	
32	88105	James Phillips Outbuilding #1	Phillips Farm	Yes	Yes	Not Historic, Not Eligible	Existing	
33	88106	James Phillips House (collapsed)	Phillips Farm	Yes	Yes	Not Historic, Not Eligible	Ruins	
34	87630	Brookside Pool Chemical Treatment Building	Brookside	Yes	Yes	Historic, Eligible - Contributing Resource	Existing	
35	87590	Vallandingham House (Addition Only)	Vallandingham	Yes	Yes	Historic, Potentially Eligible (note that the addition is not eligible).	Existing	

Appendix B: Location Maps

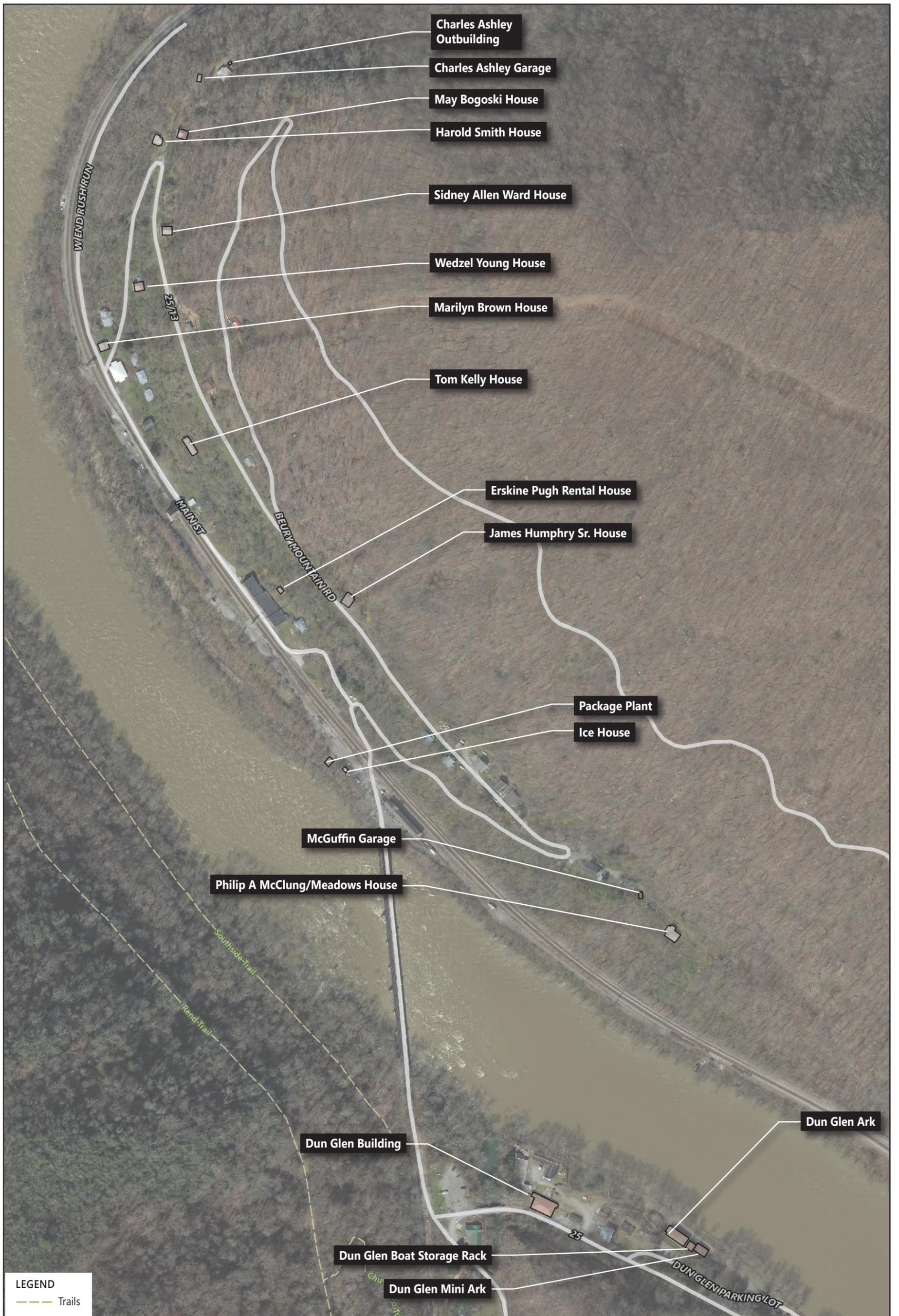


FIGURE B-1

Thurmond-Dun Glen Area Map

New River Gorge National Park & Preserve
 Remove Excess Structures Pre-NEPA Report
 United States Department of the Interior/National Park Service

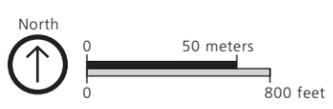


FIGURE B-2
Middle Gorge Map
 New River Gorge National Park & Preserve
 Remove Excess Structures Pre-NEPA Report
 United States Department of the Interior/National Park Service

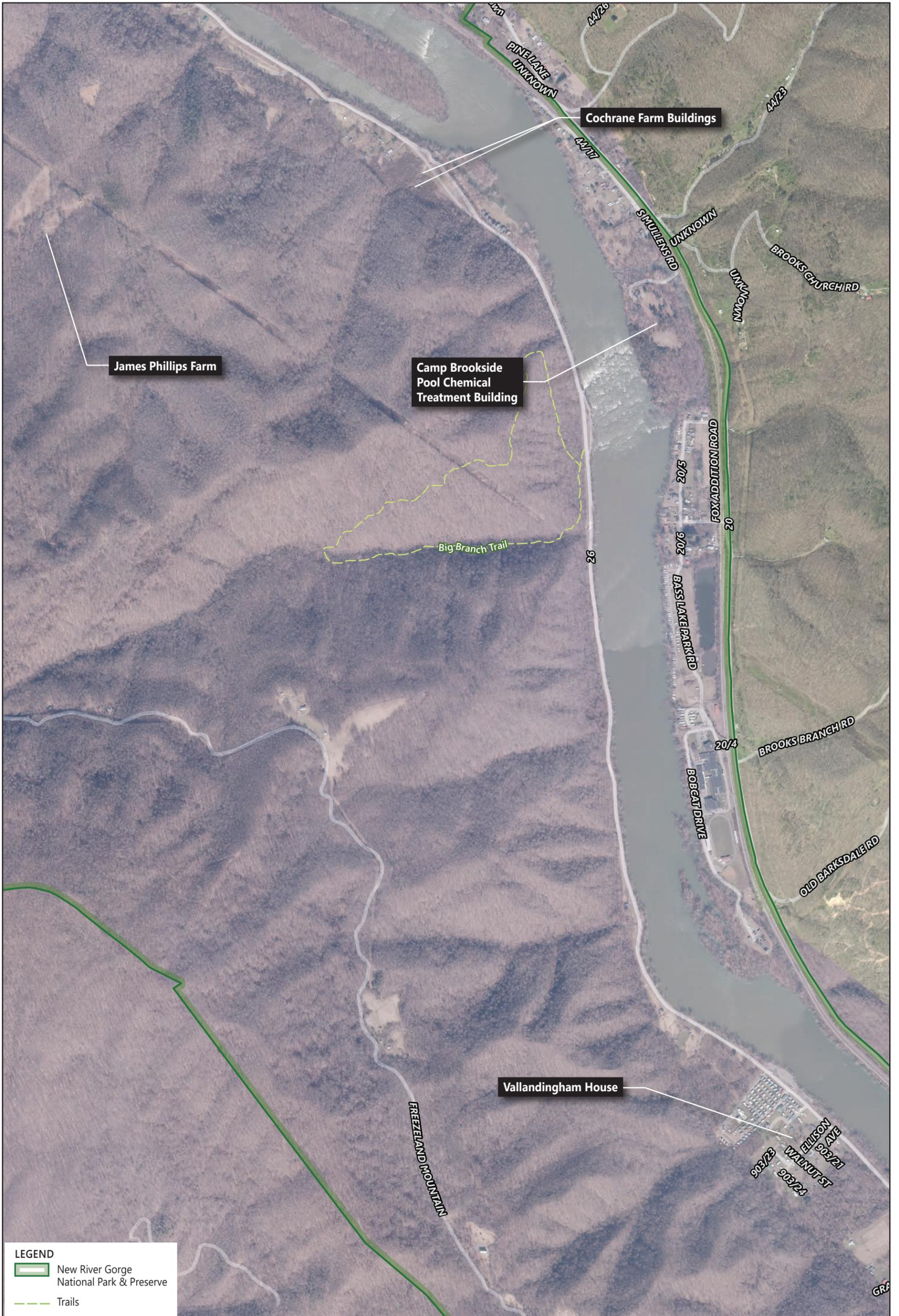


FIGURE B-3

Upper Gorge Map

New River Gorge National Park & Preserve
 Remove Excess Structures Pre-NEPA Report
 United States Department of the Interior/National Park Service

Appendix C: Ethnographic Resources Bibliography

Sources for Additional Ethnographic Research

EDAW, Inc.

- 2010 Traditional Associations of African Americans with New River Gorge National River, Glen Jean, West Virginia Final Report. Prepared for the National Park Service. July 2010.

Fuerst, David

- 1988 West Virginia Woodland Study Unit (ca. 500 B.C – A.D. 1000). Research Labs of Anthropology, University of North Carolina Chapel Hill.

Johnson, Mirmiran, and Thompson (JMT)

- 2023 Report for Archeological Investigations Ahead of Multiple Property Demolitions and Landscape Restoration, New River Gorge National Park & Preserve, Fayette, Raleigh, and Summers Counties, WV.

Maslowski, Robert F.

- 2011 Cultural Affiliation Statement. New River Gorge National River and Gauley River National Recreation Area. Northeast Region NAGPRA Program, National Park Service, Boston, MA. June 2011.

McCullough, David

- 2019 The Pioneers: The Heroic Story of the Settlers Who Brought the American Ideal West. Simon & Schuster, New York.

National Park Service

- 2017 Oral History Collection. NPS History Collection, Harpers Ferry Center for Media Development. HFCA 1817.

Ottery Group, The

- 2023 Archeological Investigation in Support of Multiple Historic Property Demolitions, New River Gorge National Park and Preserve, Fayette, Raleigh, and Summers Counties, West Virginia, Final Report, July 2023.

Trigger, Bruce G. (editor)

- 1978 *Handbook of North American Indians-Northeast (Volume 15)*. Smithsonian Institution, Washington, DC.

Unrau, Harlan D.

- 1996 Special History Study / Historic Context Study, New River Gorge National River, West Virginia, Fayette, Raleigh, Summers Counties.

Williams, Glenn F.

- 2017 *Dunmore's War: The Last Conflict of America's Colonial Era*. Westholme Publishing, Yardley, Pennsylvania.

Workman, et al.

- 2005 Special Historic Study, New River Gorge National River.