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Blue Ridge Parkway
North Carolina

Bluffs Lodge

Historic Structures Report

Cultural Resources, Partnerships and Science Division

Interior Region 2: South Atlantic-Gulf

Bluffs Lodge

Blue Ridge Parkway, North Carolina

Historic Structures Report

August 2024

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About the front cover: Bluffs Lodge, view from east, November 2021. Photograph by Wiss, Janney, Elstner Associates, Inc.

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Bluffs Lodge

Blue Ridge Parkway, North Carolina

Historic Structures Report

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Foreword

We are pleased to make available this Historic Structures Report for Bluffs Lodge along Blue Ridge Parkway in North Carolina, part of the ongoing effort to provide comprehensive documentation for the historic structures of the National Park Service. The success of this project is due in large part to the staff of Blue Ridge Parkway. The Parkway has long sought to protect and interpret this important resource. Gregory Robinson, Park Engineer, Andrew Triplett, Cultural Resources Specialist, Jackie Holt, Museum Curator, and Channing Wilcox, Maintenance Mechanic, all assisted in providing support for this project.

We would like to thank Project Lead Mark Steinback of Panamerican Consultants, Inc., and Historian/Conservator Deborah Slaton, Historical Architect and Tim Penich, and Preservation Engineers Heba Elsayed of Wiss, Janney, Elstner Associates, Inc., for their thorough research, rigorous existing conditions documentation, and carefully considered recommendations. The Parkway would also like to thank Interior Region 2 Historical Architect Dr. Ali Mire for his careful reviews as the primary NPS regional liaison on this project.

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Management Summary

At the request of the National Park Service (NPS), Panamerican Consultants, Inc., and its subconsultant, Wiss, Janney, Elstner Associates, Inc. (WJE), have developed this Historic Structures Report (HSR) for Bluffs Lodge and the nearby Bluffs Lodge Water Tank and Bluffs Lodge Pump House within the Doughton Park developed area of the Blue Ridge Parkway in North Carolina. Figure 1 is a map of the Blue Ridge Parkway showing the location of Doughton Park. Figure 2 is a trail map of Doughton Park, showing the location of Bluffs Lodge, and Figure 3 is an annotated aerial view showing the location of Bluffs Lodge, the Bluffs Lodge Water Tank, and the Bluffs Lodge Pump House.

Bluffs Lodge is located in the Doughton Park area of the Blue Ridge Parkway at milepost 241.1. One of the first concession facilities opened on the Blue Ridge Parkway, Bluffs Lodge consists of two buildings connected by a covered walkway, with a stone-paved patio between. The lodge is located south of the parkway adjacent to a parking area and contains twenty-four units and an office. The lodge remained in use until 2010 and has been closed since that time.

The Bluffs Lodge Pump House and Bluffs Lodge Water Tower are located east of the lodge. The pump house, a small concrete building, is located in a wooded area, while the steel-framed water tower is situated adjacent to Wildcat Rock Overlook.

Historical Data

In 1934, a master development plan was created for the Blue Ridge Parkway. The plan called for a narrow road corridor that would be expanded to include larger areas where recreational amenities were proposed. At this time, eighteen sites were identified for potential inclusion as recreation areas, including The Bluffs (now known as Doughton Park), where Bluffs Lodge would be constructed in 1949.

The recreation areas were intended to vary in size, and they featured amenities to meet the needs of visitors, such as fuel, food, and lodging. By 1936, the number of recreation areas had increased to twenty.

Initial construction of the parkway began on a 12-mile-long stretch of road just south of the Virginia border near Low Gap, North Carolina, in September 1935. This section was identified as 2A under a plan that divided the parkway into forty-five construction units ranging from 5.7 to 15.6 miles in length. The Bluffs, which is located in Section 2C, was thus one of the first recreation areas to be constructed along the parkway.

Doughton Park, originally known as The Bluffs, was one of the first planned recreation areas to be constructed along the parkway. Initial plans for the area called for the construction of a 60-acre lake, which was never realized. Construction on an entry road began in 1938, following conservation work, which included reforestation and erosion control. The Bluffs Lodge Water Tank was completed near Wildcat Rocks Overlook in 1938. By 1942, infrastructure work at The Bluffs was complete, with roadways, parking areas, and utilities all constructed.

Planning for accommodations at The Bluffs proceeded during the 1930s and 1940s with several different building plans proposed. A plan was not agreed upon, and funding was not provided until the later 1940s. By 1948, the design had reached its

current configuration, with two buildings set at an angle with a patio between them. Plans also called for a double-bay parking area directly adjacent to the lodge.

Bluffs Lodge opened to visitors in September 1950. In the same year, The Bluffs was renamed Doughton Park after North Carolina Representative Robert L. Doughton. Although the name of the recreational area changed, the name of the specific resource remained Bluffs Lodge.

In 1952, a pump house was constructed near the existing water tower.

With increased visitation to the parkway and Doughton Park through the 1960s and 1970s, plans were made to expand Bluffs Lodge. Although numerous designs were developed during this period and into the 1980s, expansion projects never moved forward.

Treatment and Use

Bluffs Lodge, the Bluffs Lodge Water Tank, and the Bluffs Lodge Pump House are considered eligible for listing in the National Register of Historic Places as contributing structures to the Blue Ridge Parkway Historic District. The appropriate overarching treatment for structures is *Rehabilitation*. The structures retain integrity and continue to convey their historic character. *Rehabilitation* will permit alterations to the structures, which will allow for their continued use.

Administrative Data

Locational Data

Building Names: Bluffs Lodge A, Bluffs Lodge B, Bluffs Lodge Water Tank, Bluffs Lodge Pump House

Location: Blue Ridge Parkway, North Carolina

CRIS Numbers: Bluffs Lodge A, 1166848; Bluffs Lodge B, 1166879; Bluffs Lodge Water Tank, 1166947; Bluffs Lodge Pump House, 1166908[1]

North Carolina SHPO Site Survey Numbers: Bluffs Lodge A, AL0335; Bluffs Lodge B, AL0339; Bluffs Lodge Water Tank, AL0338; Bluffs Lodge Pump House, AL0377[2]

Related Studies

Ian J. Firth. *Blue Ridge Parkway; Virginia and North Carolina; Historic Resource Study*. December 2005.

The Jaeger Company. *Doughton Park and Sections 2A, B, and C, Blue Ridge Parkway Cultural Landscape Report*. 2006.

Stephen Olausen, Melissa J. Andrade, Jill Chin, the Public Archeology Laboratory – Final Documentation; Jacqueline Bass, Susan Cianci Salvatore, and Ian Firth, University of Georgia – Previous Drafts. "Blue Ridge Parkway." National Historic Landmark nomination (revised draft). April 2023.

National Park Service. *Bluffs Lodge, Blue Ridge Parkway - Highlands District, Cultural Landscape Inventory*. 2001.

1. CRIS (Cultural Resources Inventory System) information provided by the NPS. Records for the Bluffs Lodge historic structures exist in the "shadow" CRIS. The location of the lodge buildings is noted in the CRIS record as MP 241.1, and the pump house is at as MP 241.9. The milepost is not listed for the water tank.

2. Correspondence with Andrew Triplett, Blue Ridge Parkway (BLRI), and Chandrea Burch, Survey and National Register Branch, North Carolina State Historic Preservation Office, Division of Historical Resources, May 2023.

National Park Service. *Doughton Park, Blue Ridge Parkway - Highlands District, Cultural Landscape Inventory*. 1998.

Wiss, Janney, Elstner Associates, Inc. *Blue Ridge Parkway Survey and Assessment*, February 2016.

Cultural Resource Data

Bluffs Lodge, the Bluffs Lodge Water Tank, and the Bluffs Lodge Pump House are considered eligible for listing in the National Register of Historic Places as contributing structures to the Blue Ridge Parkway Historic District, within the Doughton Park recreation area. Although no nomination documentation exists for these structures, the structures have been determined eligible through SHPO concurrence with the findings of the *Bluffs Lodge Cultural Landscape Inventory* on September 8, 2004.[3] A Determination of Eligibility for these resources is also being prepared in conjunction with this HSR. Concurrently with preparation of this HSR, a National Historic Landmark (NHL) nomination is being prepared for the Blue Ridge Parkway by others. The draft nomination reviewed for reference in this HSR submittal notes that the lodge is a contributing resource.[4]

Period of Significance:
Bluffs Lodge: 1949–1955

Bluffs Lodge Water Tank: 1938–1955

Bluffs Lodge Pump House: 1952–1955

The overarching period of significance for the Blue Ridge Parkway is 1933–1987 and for the recreation areas along the parkway is 1933–1955.[5] The period of significance for the lodge, water tank, and pump house addressed in this HSR begins with the date of construction of the individual resource, and it concludes with the end date of the period of significance for the recreation areas along the Blue Ridge Parkway, including Doughton Park, of which these resources are a part.

Proposed Treatment: Rehabilitation

Project Scope and Methodology

The goal of the HSR is to develop planning information for use in the repair, maintenance, and preservation of historically significant buildings and structures. First developed by the NPS in the 1930s, HSRs are documents prepared for a building, structure, or group of buildings and structures of recognized significance. They are developed to record and analyze the property's initial construction and subsequent alterations through historical, physical, and pictorial evidence; to document the performance and condition of the structure's materials and overall physical stability; to identify an appropriate course of treatment; and, following implementation of the recommended work, to document alterations made through that treatment.[6]

The HSR addresses key issues specific to Bluffs Lodge, the Bluffs Lodge Water Tank, and the Bluffs Lodge Pump House, including the history of the structures; their design and construction; the existing physical condition of the structures; and their historic significance and integrity. The HSR consists of the management summary, history, description and condition assessment, and significance and integrity evaluation, followed by discussion of the treatment approach and recommendations. Two appendices are included: measured drawings and a hazardous materials

3. National Park Service, *Bluffs Lodge, Blue Ridge Parkway - Highlands District, Cultural Landscape Inventory* (2001).
4. Stephen Olausen, Melissa J. Andrade, Jill Chin, the Public Archeology Laboratory – Final Documentation; Jacqueline Bass, Susan Cianci Salvatore, and Ian Firth, University of Georgia – Previous Drafts, *Blue Ridge Parkway. National Historic Landmark nomination* (draft). April 2023.
5. *Bluffs Lodge Cultural Landscape Inventory*; Olausen et al., draft *Blue Ridge Parkway National Historic Landmark nomination*.
6. Deborah Slaton, *Preservation Brief 43: The Preparation and Use of Historic Structure Reports* (Washington, DC: National Park Service, Technical Preservation Services, 2005).

analysis. The following project methodology was used for this study.

Research and Document Review. Archival research was performed to gather information about the original construction and past modifications and repairs for use in assessing existing conditions and developing treatment recommendations for the building. Documents reviewed included maps, drawings, specifications, historic photographs, and other written and illustrative documentation about the history of construction and repairs to Bluffs Lodge, Bluffs Lodge Water Tank, and the Bluffs Lodge Pump House. The research for this study built upon prior historical and archival research completed by the NPS and others. Primary reference material for this study was obtained from the Blue Ridge Parkway archives and facilities collections in Asheville, North Carolina. Additional research material was obtained from the National Park Service Technical Information Center (TIC) in Denver, Colorado.

Condition Assessment and Documentation. Concurrent with the historical research, a condition survey of the structures was performed, and observations were documented with digital photographs, field notes, and annotation on baseline drawings prepared by the project team. The condition assessment addressed all visible portions of Bluffs Lodge, the Bluffs Lodge Water Tank, and the Bluffs Lodge Pump House.

Development of History, Chronology of Construction, and Evaluation of Significance. Based on historical documentation and physical evidence gathered during the study, a context history and a chronology of design and construction were developed. An evaluation of the significance of the structures was also prepared, taking into consideration guidelines provided by the National Register Bulletin, *How to Apply the National Register Criteria for Evaluation*.[7] This evaluation of history and significance provided the basis for the development of recommended treatment alternatives.

Guidelines for Preservation. Based on the evaluation of historical and architectural significance of the structure, guidelines were prepared to assist in the selection and implementation of preservation treatments.

Treatment Recommendations. The Secretary of the Interior's Standards for the Treatment of Historic Properties guided the development of treatment recommendations for the significant features of the structures. Following the overall treatment approach of *Rehabilitation* for Bluffs Lodge, the Bluffs Lodge Water Tank, and the Bluffs Lodge Pump House, the specific recommendations were developed to address the observed existing distress conditions as well as long-term preservation objectives, while also allowing for continued use of the structures.[8] The treatment section of the report comprises Part 2 – Treatment and Use, of the HSR.

Preparation of Historic Structure Report. Following completion of research, site work, and analysis, a narrative report was prepared summarizing the results of the research and inspection and presenting recommendations for treatment. The HSR was compiled following guidance afforded by Director's Order NPS-28, *Cultural Resource Management Guideline*, and NPS *Preservation Brief 43: The Preparation and Use of Historic Structure Reports*, with modifications to organizational structure for purposes of this project.[9]

7. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (Washington, DC: National Park Service, National Register of Historic Places, 1997).
8. Anne E. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* (Washington, DC: National Park Service, Historic Preservation Services, 2017).
9. NPS-28, *Cultural Resource Management Guideline*, accessed August 17, 2023, https://www.nps.gov/parkhistory/online_books/nps28/28intro.htm; Slaton.

Figure 1. Map of the Blue Ridge Parkway showing the location of Doughton Park. (Source: *Blue Ridge Parkway Survey and Assessment*, annotated by authors)

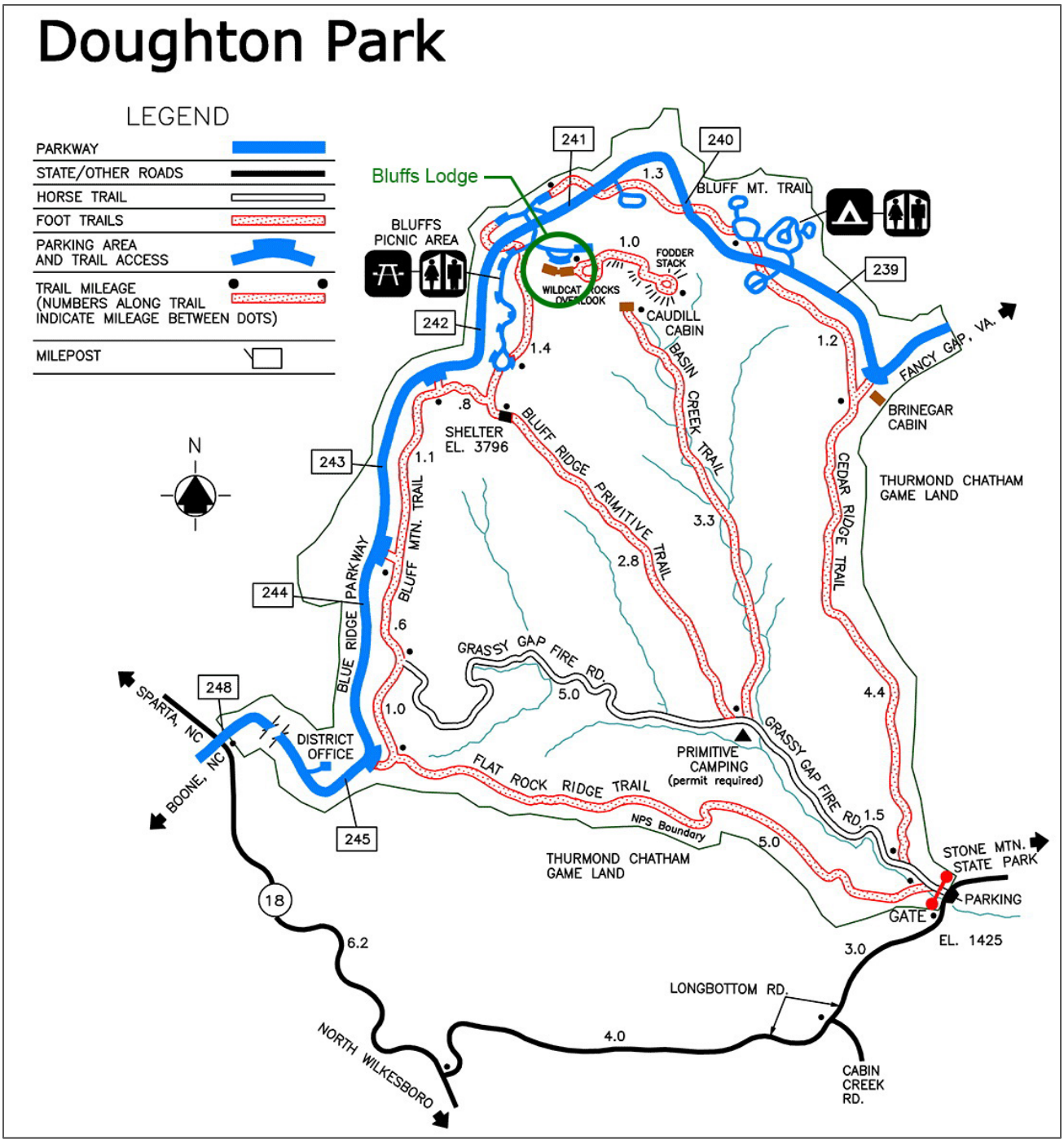

Figure 2. Trail map of Doughton Park, showing the location of Bluffs Lodge. (Source: National Park Service, Blue Ridge Parkway web site, annotated by the authors)

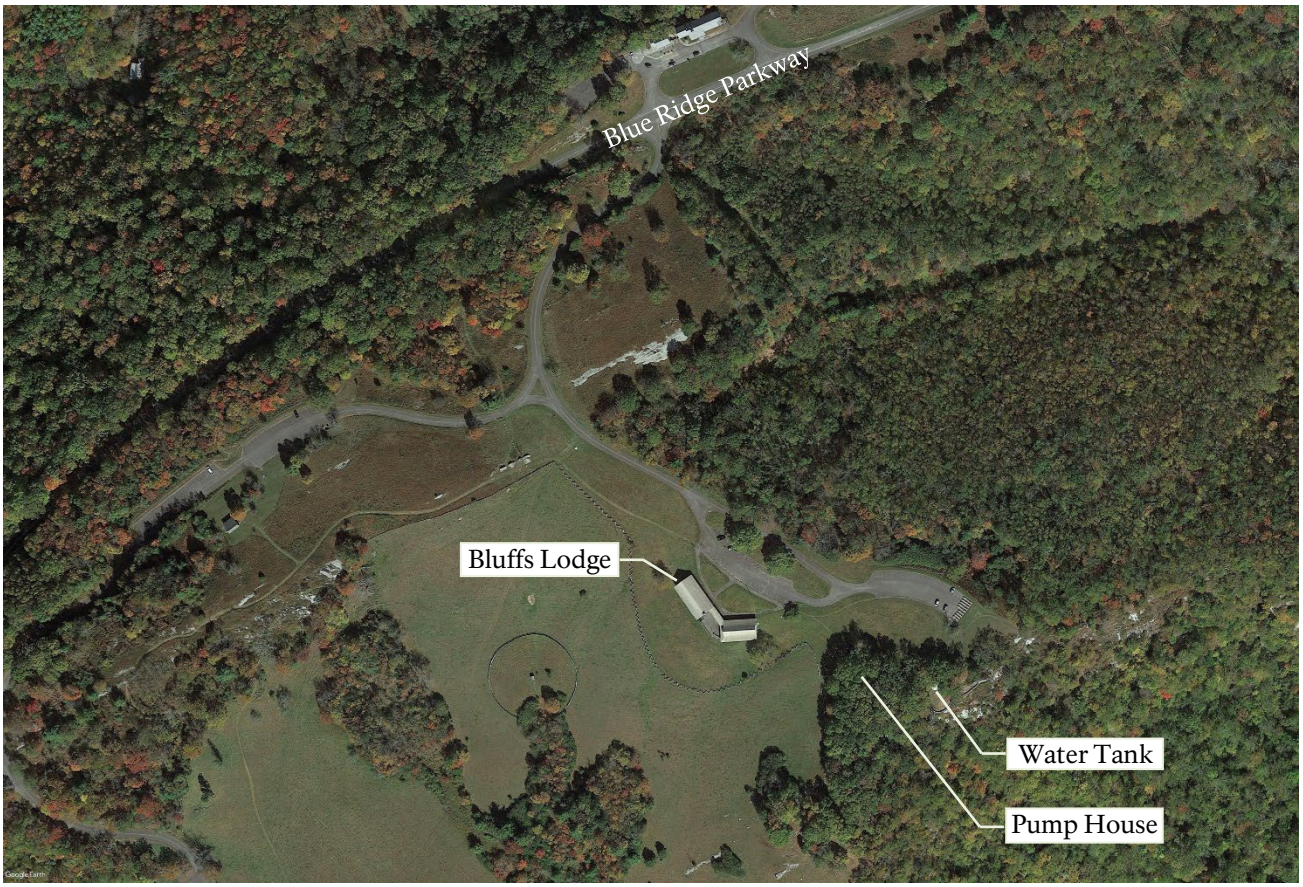

Figure 3. Partial aerial view of the Doughton Park area showing the location of Bluffs Lodge, the Bluffs Lodge Water Tank, and the Bluffs Lodge Pump House. (Source: Google Earth; annotated by the authors)

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Developmental History

This chapter of the Historic Structures Report consists of two sections: a brief overview of the history of the Blue Ridge Parkway and the Doughton Park developed area, and a discussion of the design, construction, and later modifications to the structures at Bluffs Lodge. The latter section includes a chronology of evolution of Bluffs Lodge, Bluffs Lodge Water Tank, and Bluffs Lodge Pump House.

Origins of the Blue Ridge Parkway (1909–1930)

The idea for a scenic roadway through the Southern Appalachian region dates to a proposal initially promoted by Joseph Hyde Pratt, State Geologist of North Carolina, who advocated for the construction of the "Crest of the Blue Ridge Highway." Pratt suggested the road follow the upper reaches of the Blue Ridge Mountain range and run from Marion, Virginia, to Tallulah Falls, Georgia (Figure 4). In 1914, Pratt and others chartered the Appalachian Highway Company through the North Carolina General Assembly, with proposed funding provided by tolls. Work was initiated on a 40-mile-long section between Altapass and Linville, North Carolina, before the United States' involvement in World War I and associated needs for funds and labor effectively ended the project.[10]

New plans for a scenic motorway through the Blue Ridge Mountains emerged again in 1930, when the Eastern National Park-to-Park Highway Association proposed to join two national parks established in 1926—Shenandoah and Great Smoky Mountains national parks—with a road that would follow the dramatic terrain of the Southern Appalachian Mountains. While initially the Association considered using a system of improved state highways as the basis for the route, it soon recognized that construction of an entirely new road would be necessary due to lack of adequate roads in the region.[11]

10. Richard Quin, *Blue Ridge Parkway HAER Report No. NC-42* (Washington, DC: US Department of the Interior, 1997), 26.
11. The National Park-to-Park Highway Association was formed in 1916 and began promoting roads and roadway improvements in the Northwest and Rocky Mountain states. The Association would later expand to include an eastern branch. In 1928, the eastern branch, under the leadership of Rep. Maurice H. Thatcher of Kentucky, began to lobby for a federally supported highway to link the three eastern national parks with Washington, DC, and the new historic sites being developed at Williamsburg, Jamestown, and Yorktown, Virginia, before championing a mountain ridge parkway linking Shenandoah and Great Smoky Mountains national parks.

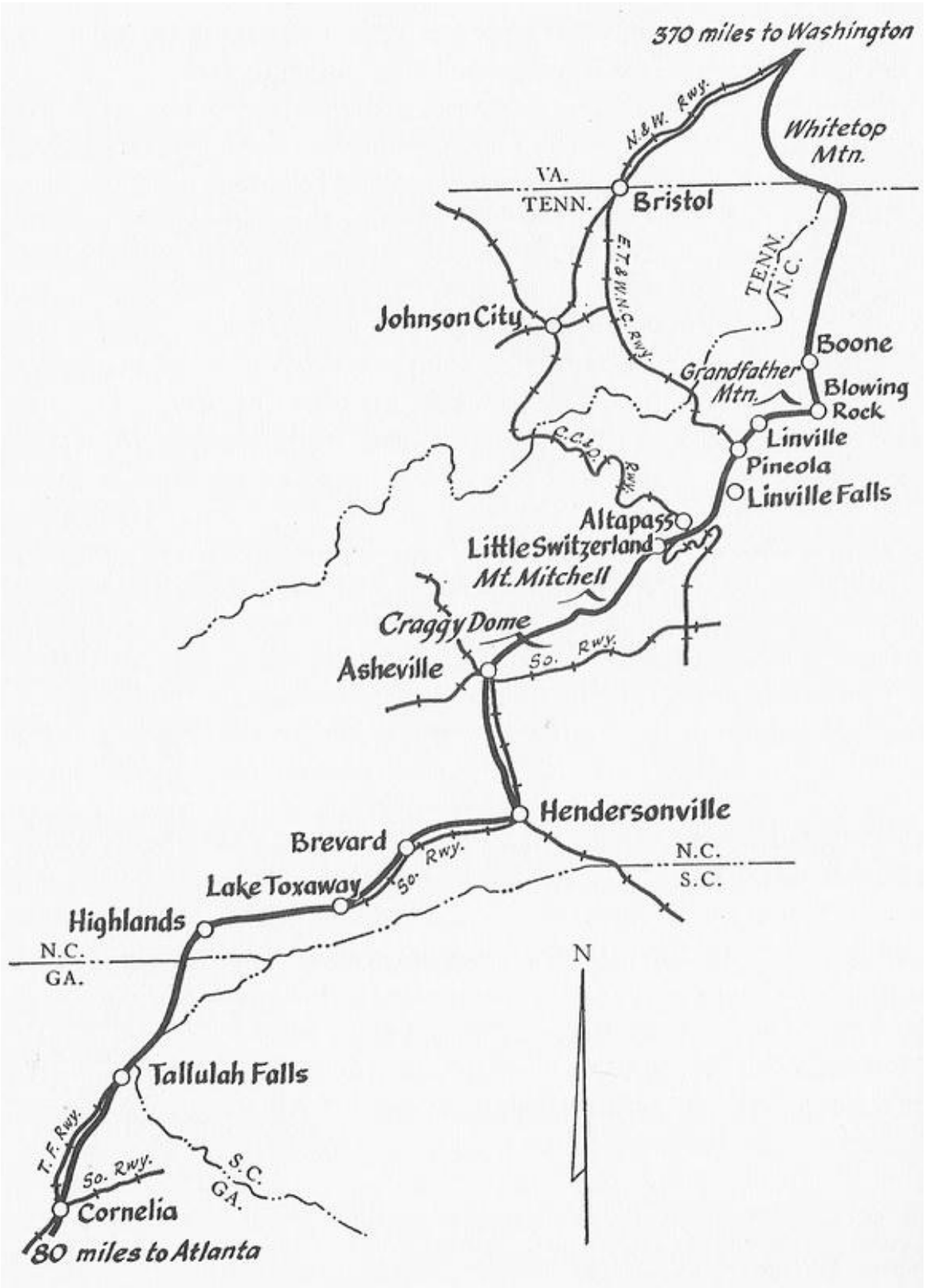


Figure 4. Proposed route of the Crest of the Blue Ridge Highway, based on the original map. (Source: Harley E. Jolley and William A. Bake, *Blue Ridge Parkway: The First 50 Years*)

The parkway concept in the United States had first emerged in the early twentieth century as the popularity of the automobile increased. The first road of this type, the Bronx River Parkway, constructed in New York City in 1925, connected the Bronx Zoo and New York Botanical Garden. The popularity of the Bronx River Parkway spawned other parkway projects in the region, with many planners and designers gaining experience on these early parkway projects. These early parkways were essentially linear parks for automobiles, and they often featured wide rights-of-way, grade separations at major intersections, four-lane cross sections, and sweeping super-elevated curves. The wide right-of-way allowed space for recreation, while also precluding development along the roadway.[12]

While many of the earliest parkways were established in and near urban communities in the eastern United States, national park planners began to adapt the concept for parks in the western part of the country, establishing scenic drives at parks such as Yosemite and Yellowstone. The first parkway in an eastern national park was constructed at Shenandoah National Park. Construction of Skyline Drive began in 1931 and was completed in 1939. The 105-mile-long scenic motorway follows the crest of the Blue Ridge Mountains in central Virginia.

Initial Establishment of the Blue Ridge Parkway (1933–1942)

The Great Depression played an integral role in the development of the Blue Ridge Parkway. Following his inauguration in 1933, President Franklin Roosevelt advanced a series of programs and regulations known as the "New Deal," which was designed to stimulate the economy and help Americans suffering due to the ongoing depression. Congress soon enacted the National Industrial Recovery Act (NIRA), which established the Public Works Administration (PWA) and authorized the Public Works Administrator, Secretary of the Interior Harold L. Ickes, to prepare a comprehensive program of public construction projects. The proposed Park-to-Park Highway in Southern Appalachia was well-suited to the program and immediately appealed to Ickes. Additionally, the act authorized the government to acquire land considered submarginal for agricultural use. At the time, the Southern Highlands region exhibited problems of severe soil erosion resulting from the steeply sloped terrain and poor farming practices. Within months of the passage of NIRA, a group of businessmen and politicians from Virginia, North Carolina, and Tennessee began lobbying the PWA to consider construction of the proposed park-to-park roadway.[13] After visiting Skyline Drive, President Roosevelt also encouraged Secretary Ickes to pursue the project.

The Recreational Demonstration Area (RDA) program was established during this time as part of the NIRA. The Blue Ridge Parkway is one of forty-six public parks created in twenty-four states under the RDA program.[14] As part of this program, parks were constructed near urban communities to provide new recreational opportunities and serve as an example of how such recreation areas should be planned and developed. In his 1935 annual report, Arno B. Cammerer, Director of the NPS, noted that NPS had undertaken:

> . . . studies of submarginal lands with a view to recommending reallocation of certain areas as demonstration projects to provide low-cost

12. Ian J. W. Firth, *Blue Ridge Parkway; Virginia and North Carolina: Historic Resource Study* (Athens: University of Georgia, December 2005), 37, citing John Nolen and Henry V. Hubbard, *Parkways and Land Values* (Cambridge: Harvard University Press, 1937), 90.
13. Anne Mitchell Whisnant, *Super-scenic Motorway: A Blue Ridge Parkway History* (Chapel Hill: University of North Carolina Press, 2006), 35–36.
14. The Blue Ridge Parkway was initially known as the Blue Ridge Recreational Demonstration Area. Other parks resulting from the program included Acadia National Park, Badlands National Park, Manassas National Battlefield Park, and Theodore Roosevelt National Park.

> recreational facilities for concentrated urban populations, especially the underprivileged group.[15]

By October 1933, a small committee had been established to develop a formal proposal for the road. In November 1933, Ickes approved federal funding for the "Park-to-Park Road" under the PWA.[16] In December 1933, the PWA passed a resolution allotting the National Park Service four hundred million dollars to finance the construction of the scenic highway.[17] The road was initially considered an extension of Skyline Drive, and it was referred to by several names during the planning process, including the Appalachian Scenic Highway and the Appalachian Park-to-Park Highway. It was not until Congress formally authorized the project in 1936 that the name Blue Ridge Parkway was used.

Establishment of the Route and Land Acquisition

The only instructions parkway planners received from the Secretary of the Interior regarding the route of the proposed parkway was to connect the Shenandoah and Great Smoky Mountains national parks with a roadway that would follow the crest of the mountains, which gave the planners considerable leeway in the choice of a route. Two principal routes were considered viable. While both proposed routes extended between Shenandoah National Park and Blowing Rock, North Carolina from there, one route traveled through Tennessee, and the other went through North Carolina. While both states promoted the routes that traveled through their state, Secretary Ickes selected the North Carolina route on November 10, 1934, noting that North Carolina had two national forests (Pisgah and Nantahala) that could be used for the parkway corridor, requiring less acquisition of property; North Carolina was considered more scenic; and significant federal funding had already been channeled to Tennessee through the creation of the Tennessee Valley Authority.[18]

Design

A master development plan for the parkway completed in 1934 called for a narrow road corridor that would be expanded to include larger areas where recreational amenities were developed. The recreation areas would also include amenities such as gas, food, and overnight lodging.[19] Stanley Abbott, Resident Landscape Architect for the parkway, believed visitors would like to stay in cabins or small inns along the parkway and food amenities would be necessary for picnickers and campers. Additionally, gasoline and service stations would need to be included at regular intervals. Planners believed if these facilities were not constructed along the parkway, they would be provided by private enterprises at road crossings, potentially affecting the visual quality of the road corridor.

For built features, parkway designers sought to utilize the rustic style, which had become a hallmark of the National Park Service and natural parks in the western United States. This style incorporated native materials, such as stone and wood, drew from local building traditions, and was designed to blend with the natural environment (Figure 5). One of the main design objectives was to make human-made structures as inconspicuous as possible within the landscape. For the Blue Ridge Parkway, Abbott hoped the

15. "Annual Report of the Director of the National Park Service," 1935, in *Annual Report of the Secretary of the Interior*, 1935, 208.
16. Harry Byrd to Pollard, November 24, 1933. Blue Ridge Parkway Archives, RG 5, Series 44, Box 54, Folder 10.
17. Ian Firth, "Historical Significance of the Blue Ridge Parkway," *Appalachian Cultural Resources Workshop Papers*, Introduction; Harley E. Jolley, *The Blue Ridge Parkway* (Knoxville: University of Tennessee Press, 1969), 43–44.
18. Wiss, Janney, Elstner Associates, Inc., *Blue Ridge Parkway Survey and Assessment* (February 2016), 30 citing Timothy N. Osment, "The Blue Ridge Parkway," accessed May 4, 2022, http://www.learnnc.org/lp/ editions/nchist-worldwar/5830 [website no longer active].
19. National Park Service, *Appalachian National Parkway from Shenandoah National Park to Great Smoky Mountains National Park*, Master Plan, 1934. Blue Ridge Parkway Archives.

structures would also reflect the architecture of the Southern Appalachian region. Further, Abbott believed that the buildings, structures, and other features should be simple and informal to better harmonize with the natural environment.[20]

Figure 5. Service station and coffee shop at the Bluffs (present-day Doughton Park), September 1953. (Source: National Park Service, Blue Ridge Parkway, milepost 239, negative no. 675)

Recreation Areas

Where recreation areas were provided along the parkway, the narrow ribbon of parkway land would widen. In describing the concept for the recreation areas, Abbott noted, "we were guided, too, by some sense of need for rhythm or pattern—or a jewel on the string of beads occurring every so often . . . . Our theory was a major park every sixty miles, and in between two lesser day-use areas.[21] In 1938, Abbott also suggested that "The Blue Ridge Parkway might more accurately be described as a park and parkway system. The concurrent development of parks to the side into which the tourists may withdraw from the traffic is no less important to its full functioning as a new type of tourist facility."[22]

The recreation areas were planned to include opportunities for visitors to connect with the scenic attractions of the region more deeply, while also including carefully composed developments to serve the anticipated needs of motorists, such as fuel, food, lodging, and curios. This type of development was to be implemented only at selected areas, with some areas instead serving more primarily to preserve and protect natural resources. During the planning process, Abbott stressed that the recreation areas would be as important to the park as the road itself.

In 1934, eighteen sites were identified for potential inclusion as recreation areas. By the time the 1936 master plan was completed, the number of recreation areas had increased to twenty, which included the following:

Humpback Rocks, Sections 1B and 1C
Norwall Flats, Section 1E (later removed from the list)
Lick Log Spring, Section 1F (never built)
Peaks of Otter, Section 1H
Pine Spur, Section 1P (never built)
Smart View, Section 1Q
Rocky Knob, Section 1S
Fisher Peak, Section 1W (never built)
Cumberland Knob, Section 2A
The Bluffs, Section 2C (now known as Doughton Park)
Tompkins Knob, Section 2E (never built)
Linville Falls, Section 2J
Crabtree Meadows, Section 2M (now known as Crabtree Falls)
Mount Mitchell, Section 2N (never built)
Craggy Gardens, Section 2P
Bent Creek, Section 2S (never built)
Mount Pisgah, Section 2T
Pigeon River Falls, Sections 2U and 2V (never built)
Tennessee Bald, Section 2V (never built)
Richland Balsam, Section 2W (never built)[23]

The recreation areas were intended to vary in size, with larger areas encompassing between 1,000 and

20. Stanley W. Abbott to Regional Director, December 3, 1943, 12.
21. Abbott interview, 35.
22. Abbott, untitled manuscript, as quoted in Richard Quin, *Blue Ridge Parkway Historic American Engineering Record Report No. NC-42*, 159.
23. Five additional sites not identified in the 1936 master plan would become recreation areas: Otter Creek (section 1G), Roanoke Mountain (section 1M), Mabry Mill (section 1T), Moses H. Cone Memorial Park (section 2G), and Waterrock Knob (section 2X).

4,000 acres and smaller recreation areas approximately 500 acres in size. Nine of the recreation areas would be sited on lands owned by the US Forest Service due to the facility of transferring federal land among agencies. A total of twenty-three areas providing recreational facilities and services would eventually be constructed along the parkway.[24]

Initial construction of the parkway began on a 12-mile-long stretch of road just south of the Virginia border near Low Gap, North Carolina, in September 1935.[25] This section was identified as 2A under a plan that divided the parkway into forty-five construction units ranging from 5.7 to 15.6 miles in length. The Bluffs, which is located in Section 2C, was thus one of the first recreation areas to be constructed along the parkway.

Segregation and the Blue Ridge Parkway Recreation Areas. Planning for the parkway in the 1930s and 1940s included provision of segregated facilities for African American visitors. As noted in the *Historic Resource Study: African Americans and the Blue Ridge Parkway*, the 1939 annual report to the director of the National Park Service by Stanley Abbott, Superintendent of the Blue Ridge Parkway, included the following "Provisions for Negroes," as determined by a conference held in Washington, DC, in April of that year:

> General plans crystallized during the year for provision of Negro facilities in the recreation parks. The following points of agreement resulted from a conference with Mr. W. J. Trent, Advisor to the Secretary on Negro Affairs, Acting Director Demaray, Chief of Planning, Thomas Vint, and others on April 26, 1939, in Washington.
>
> 1. Gasoline, service and eating facilities located close to the Parkway will in all cases provide both for White and Negro use with these provisions:
>   a. no division between White and Negro use of gasoline or automobile service facilities
>   b. no division between White and Negro use of sandwich shop, lunch counter, or sales room
>   c. separate dining rooms for White and Negro use, when dining rooms are provided.
> 2. In the large parks such as Rocky Knob in Virginia and the Bluff in North Carolina, separate cabin, camping, and picnicking areas will be provided for Negro use. At the Bluff Park one picnic area will be opened for joint use by both Whites and Negroes.
> 3. In the matter of comfort stations, if one building is used for both Negroes and Whites, the sexes of both races will use common entrances. Inside the building separate toilets will be provided for each race. There will be no separation between Whites and Negroes in the installation of urinals and wash basins.[26]
>
> NOTE: These policies were approved by the Secretary.

Abbott further noted: "The need for recreational facilities for Negroes in Western Virginia and North Carolina is considerable, and its provision in connection with the parkway in the best possible manner should be a major objective."[27]

Segregated facilities included an "all-Negro recreation area," Pine Spur, at milepost 144, twenty-seven miles south of Roanoke, Virginia. Construction at Pine Spur began in 1941, with swings, picnic tables, and driveways completed by the end of the summer. However, construction of Pine Spur and other facilities along the parkway were halted by the United States' entry into World War II. When the war ended in 1945, "segregation

24. Firth, "Historical Significance of the Blue Ridge Parkway."
25. Whisnant, "Super-scenic Motorway," 45–46.
26. Rebecca Jones; Dr. Pat Beaver and Dr. Neva Specht (Faculty Advisors); Jackie Holt, Carolyn Jones, and Leslie White (Research Assistants), *Historic Resource Study: African Americans and the Blue Ridge Parkway (2009)*, 6–7, citing Abbott, June 30, 1939, 16, 1939 annual report to the director of the National Park Service, Blue Ridge Parkway.
27. *Historic Resource Study: African Americans and the Blue Ridge Parkway*, 6–7, citing Abbott, June 30, 1939, 16.

policies seemed to have been forgotten and Pine Spur was never completed or opened."[28]

(See further discussion of segregated facilities at The Bluffs [Doughton Park], below.)

Doughton Park

Doughton Park, originally known as The Bluffs, is one of the developed areas shown on the 1936 Blue Ridge Parkway Master Development Plan. Extending from milepost 238.5 to milepost 244.7, Doughton Park was one of the first planned recreation areas along the parkway. The Doughton Park site, comprising 6,300 acres that included steeply sloping forested land, featured rustic trails, overlooks, and a shelter, as well as pioneer buildings, campgrounds, picnic areas, lodging, food service, a gas station, and a maintenance area. Development primarily occurred at seven sites located closer to the parkway. These sites included (from north to south): Brinegar Cabin, Doughton Park Campground, Bluffs Coffee Shop and Service Station, Bluffs Lodge, Caudill Family Homestead, Bluffs Picnic Area, and Doughton Park Maintenance Area.[29]

Figure 6. Bluffs area prior to construction of the parkway, undated. (Source: BLRI Archives, RG5, Series 22, Box 30, Folder 13)

28. *Historic Resource Study: African Americans and the Blue Ridge Parkway*, 3.
29. *Bluffs Lodge Cultural Landscapes Inventory*, 4.
30. Whisnant, "Super-scenic Motorway," citing *General Development Map, The Bluff* [drawing], approved 6 February 1936, DSC/TIC file, BLRI, The Bluff General Development, Drawing, 1051, 2/1/1936.

The 1936 development plan for The Bluffs included construction of a 60-acre lake near the junction of Caudill Branch and Basin Creek. The lake, which would have required the destruction of existing farmsteads, was never constructed. The plan also provided recommendations for vegetation, which included seeding and tree planting.[30]

Conservation work in The Bluffs began in 1937 with the reforestation of eroded lands, reseeding of open pastures, including tree and shrub planting, removal and replacement of fencing, and construction of erosion control near streams.[31]

Planning for food, lodging, and motor service amenities at The Bluffs began by 1937, with proposals made for the construction of a lodge, restaurant, and gas station.[32]

In 1938, construction began on an entry road leading to the future Bluffs Lodge and Wildcat Rocks Overlook. The road ran from the parkway to a parking lot near the new Wildcat Rocks Overlook.[33] The overlook was constructed in 1938–1939.

Development work at The Bluffs area had begun by 1939, when Stanley Abbott noted that 250 personnel from the Works Progress Administration (WPA) were working in the area. In addition, Civilian Conservation Corps (CCC) workers stationed at Camp NP21, near The Bluffs, were charged with completing landscape projects along the parkway.[34]

Workers with the WPA and CCC constructed the maintenance area at The Bluffs in 1939–1940. A concrete dam was also completed around this time, creating a reservoir to supply water to the amenities area. Water was pumped from the reservoir to a pair of water towers, one at the campground and the other, the Bluffs Lodge

31. Firth, *Historic Resource Study*, 216.
32. The Jaeger Company, *Doughton Park and Sections 2A, B, and C, Blue Ridge Parkway Cultural Landscape Report (2006)*, 40.
33. *Doughton Park Cultural Landscape Report*.
34. Firth, *Historic Resource Study*, 212.

Water Tank, at Wildcat Rocks Overlook (Figure 7 and Figure 8).[35] Electricity was provided throughout the parkway using underground commercial lines.[36]

Figure 7. Bluffs Lodge Water Tank at Wildcat Rocks Overlook, 1939, photograph labeled "CCC Job 530." (Source: *Driving through Time* web site, from the National Park Service, Blue Ridge Parkway headquarters, accessed October 2022, https://docsouth.unc.edu/blueridgeparkway/content/8325/)

Figure 8. Another view of Bluff Lodge Water Tank at Wildcat Rocks Overlook, 1939, photograph labeled "CCC Job 530." (Source: *Driving through Time* web site, from the National Park Service, Blue Ridge Parkway headquarters, accessed October 2022, https://docsouth.unc.edu/blueridgeparkway/content/8714/)

35. Firth, *Historic Resource Study*, 218.

36. Firth, *Historic Resource Study*, 218.

The Annual Superintendent's Report for 1938 noted:

> Progress in the Bluff Park was seriously hampered by acquisition difficulties and by its inaccessibility pending the completion of the Parkway in the mid-summer. Since early fall, however, a force of 200 W.P.A. laborers have made rapid progress on picnic areas, parking areas, a road to the proposed lodge, several miles of trail and general clean-up.[37]

Planning for the lodge at The Bluffs proceeded during the late 1930s, with several different building plans proposed during this time. A plan was not agreed upon and funding was not provided for the lodge until the late 1940s, as further discussed below.[38]

A 1941 plan developed for the Bluff Park Recreation area included buildings, a short trail, and a parking area. These plans also called for separate amenities for African American visitors, including cabins, campgrounds, picnic areas, and comfort stations (Figure 9 through Figure 13).[39] Segregated restrooms were shown in the master plan for the site as early as 1936 and as late as 1943.[40] Construction of "Negro facilities at the North Carolina Bluff Park . . . was reported to already be in progress by 1939."[41]

Segregated picnic facilities were established at The Bluffs.[42] An African American family made a complaint to NPS Director Newton Drury in 1941 when they tried to use a picnic area ("the meadows," picnic area no. 3) that was designated for "whites only" use. By 1942, plans were made to allow blacks and whites to use this picnic area.[43] Construction of other segregated facilities does not appear to have occurred in association with Bluffs Lodge, likely in part because of its later date of construction.

37. Superintendent's Annual Report to the Director, National Park Service, January 1938, 16.
38. *Bluffs Lodge Cultural Landscape Inventory*, 41–42.
39. *Bluffs Lodge Cultural Landscapes Inventory*, 38, citing, Roads and Trails Map [drawing], Bluff Park Recreational Area, DSC/TIC file, BLRI, Bluff Park- Roads + Trails, 2003, 4/1/1937. There is no evidence that this area was ever constructed.
40. *Historic Resource Study: African Americans and the Blue Ridge Parkway*, 3.
41. *Historic Resource Study: African Americans and the Blue Ridge Parkway*, 8, citing Abbott, June 24, 1939, 4.
42. *Historic Resource Study: African Americans and the Blue Ridge Parkway*, 3.
43. *Historic Resource Study: African Americans and the Blue Ridge Parkway*, 3, 8–10, citing Abbott, June 30, 1942, 27.

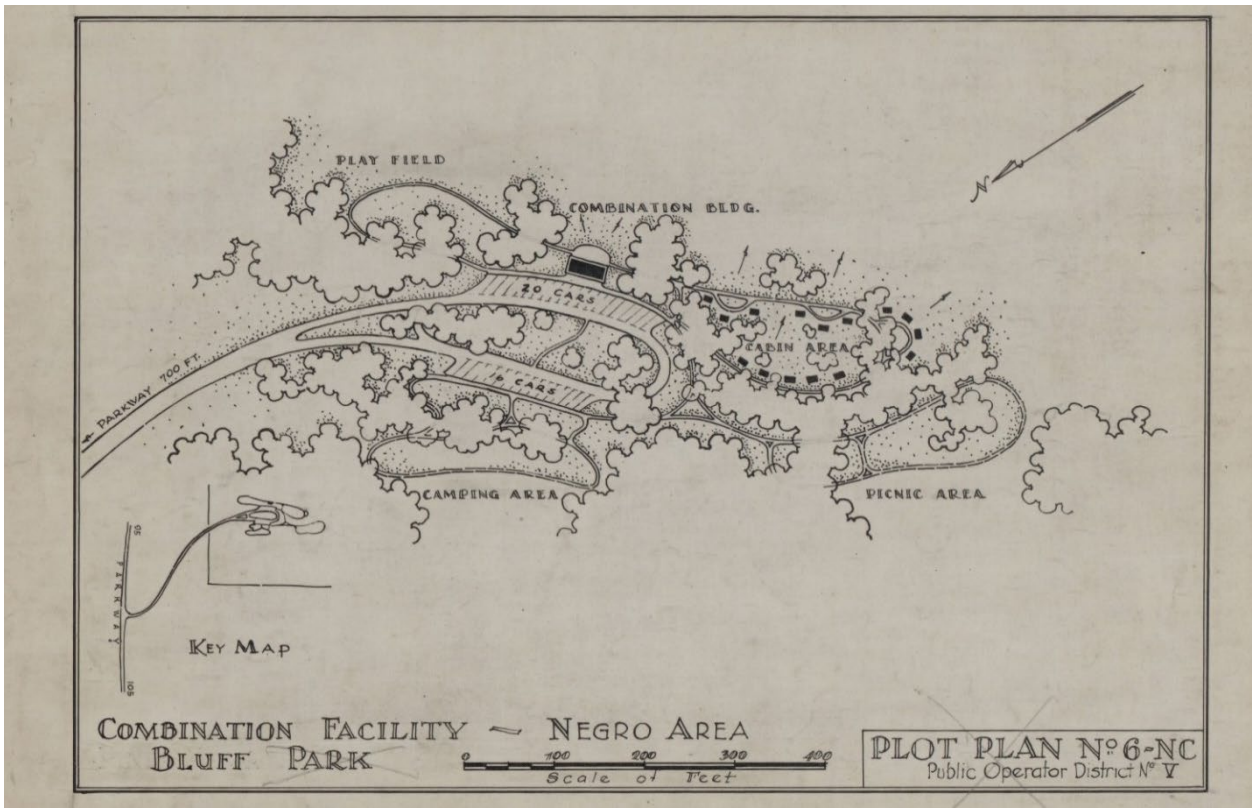


Figure 9. Site plan for "Combination Facility – Negro Area" at Bluff Park, undated. (Source: Libraries of the University of North Carolina at Chapel Hill)

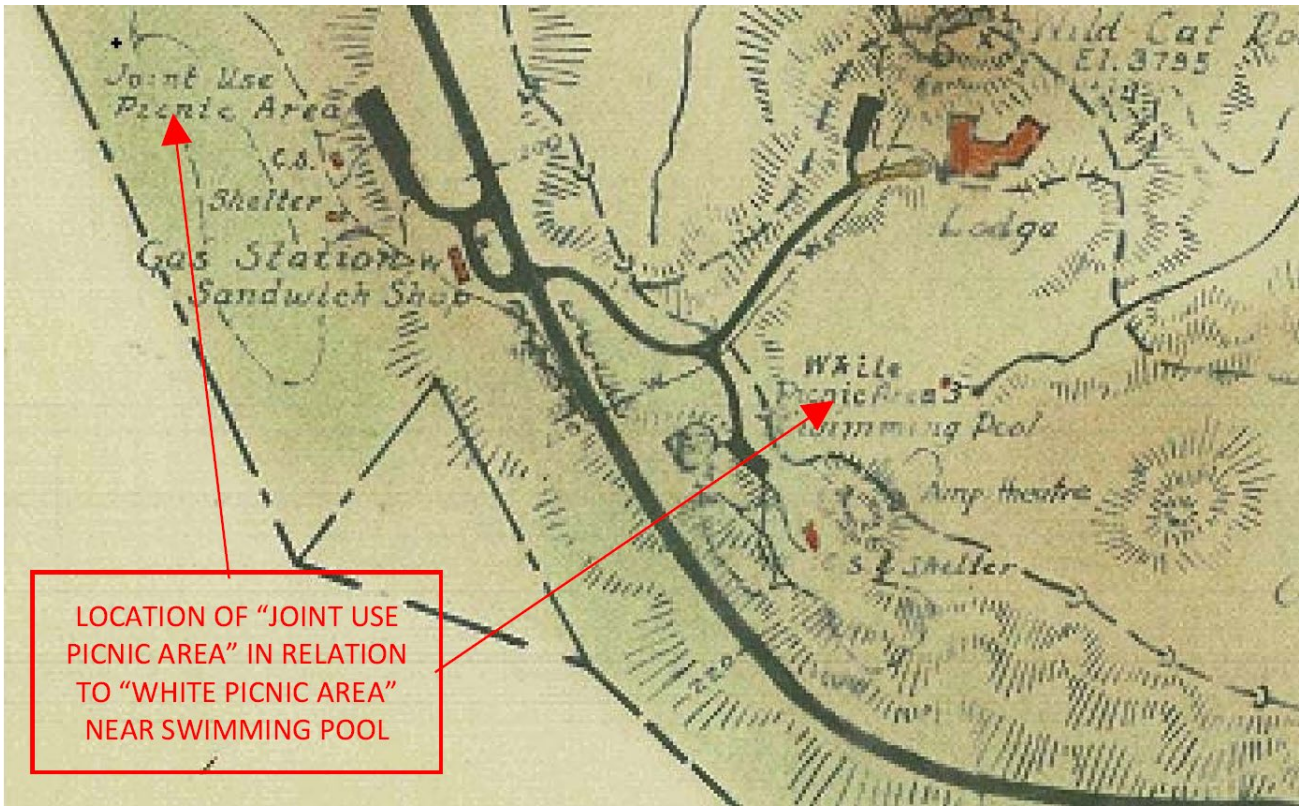


Figure 10. Master Plan drawing of Bluff Park (1941), showing the proposed "joint use picnic area" and the "white picnic area." (Source: BLRI Archives, PKY-BR-BL-2003; annotated by Stephanie Heher for *A Long Road: How Jim Crow Affected the Design and Development of Recreational Areas along the Blue Ridge Parkway*)

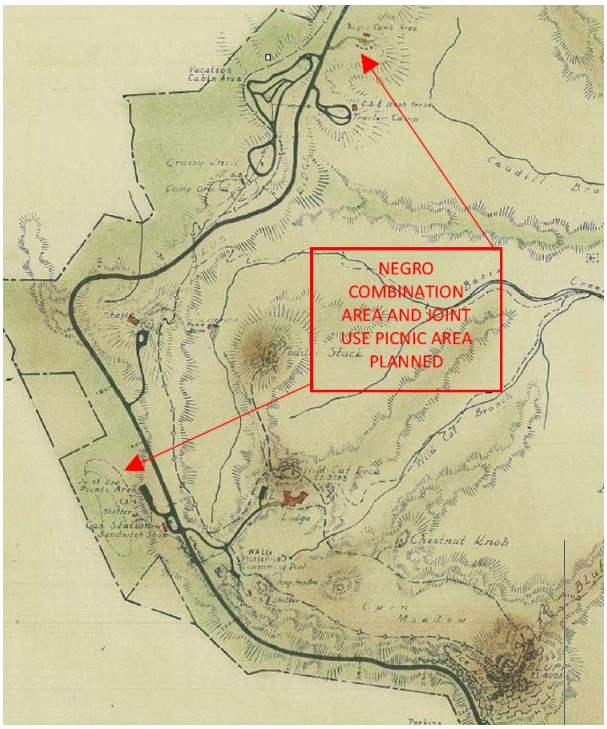


Figure 11. Site plan for Bluff Park (1941), showing a "Negro combination area" and a "joint use picnic area." (Source: BLRI Archives, PKY-BR-BL-2003; annotated by Stephanie Heher for *A Long Road: How Jim Crow Affected the Design and Development of Recreational Areas along the Blue Ridge Parkway*)

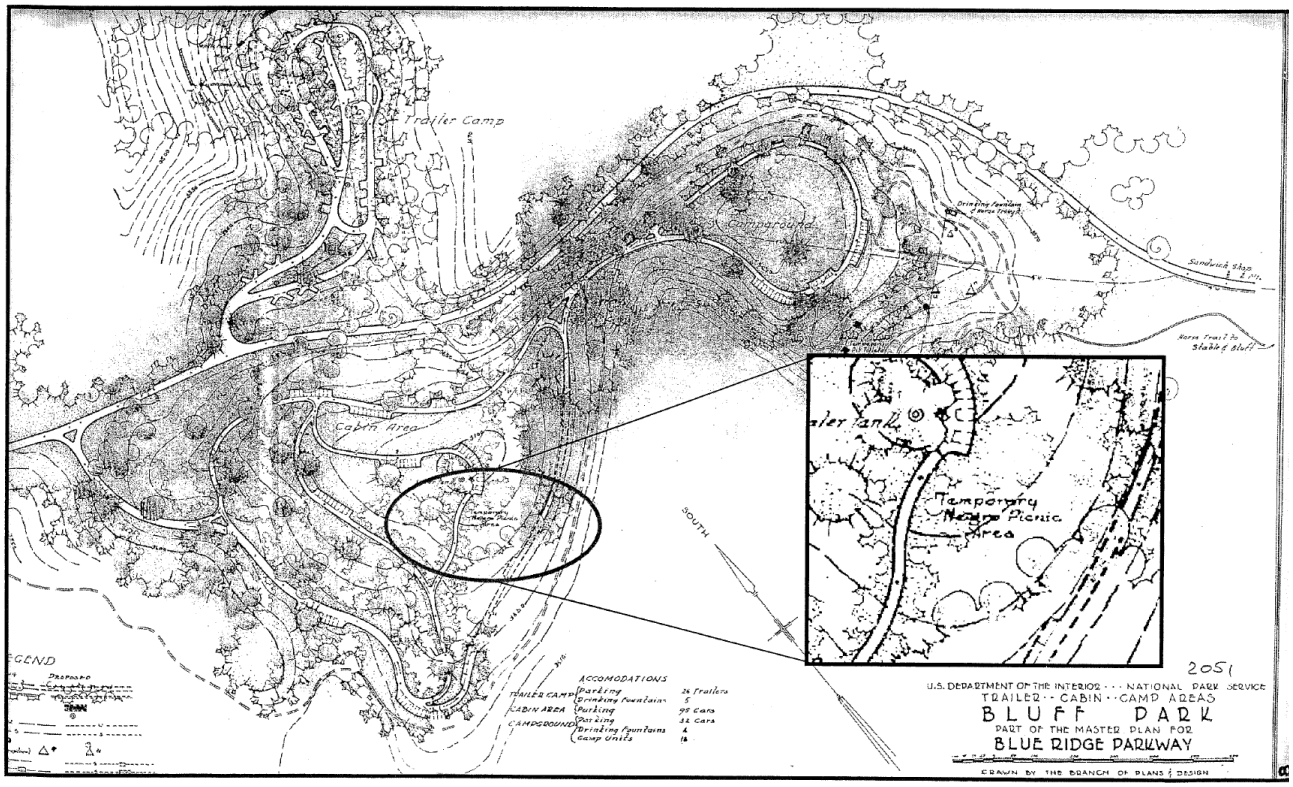


Figure 12. Site plan for Bluff Park (1941), showing a "Temporary Negro Picnic Area."(Source: BLRI Archives, PKY-BR-BL-2051; annotated drawing from Rebecca Jones, *Historic Resource Study: African Americans and the Blue Ridge Parkway*)

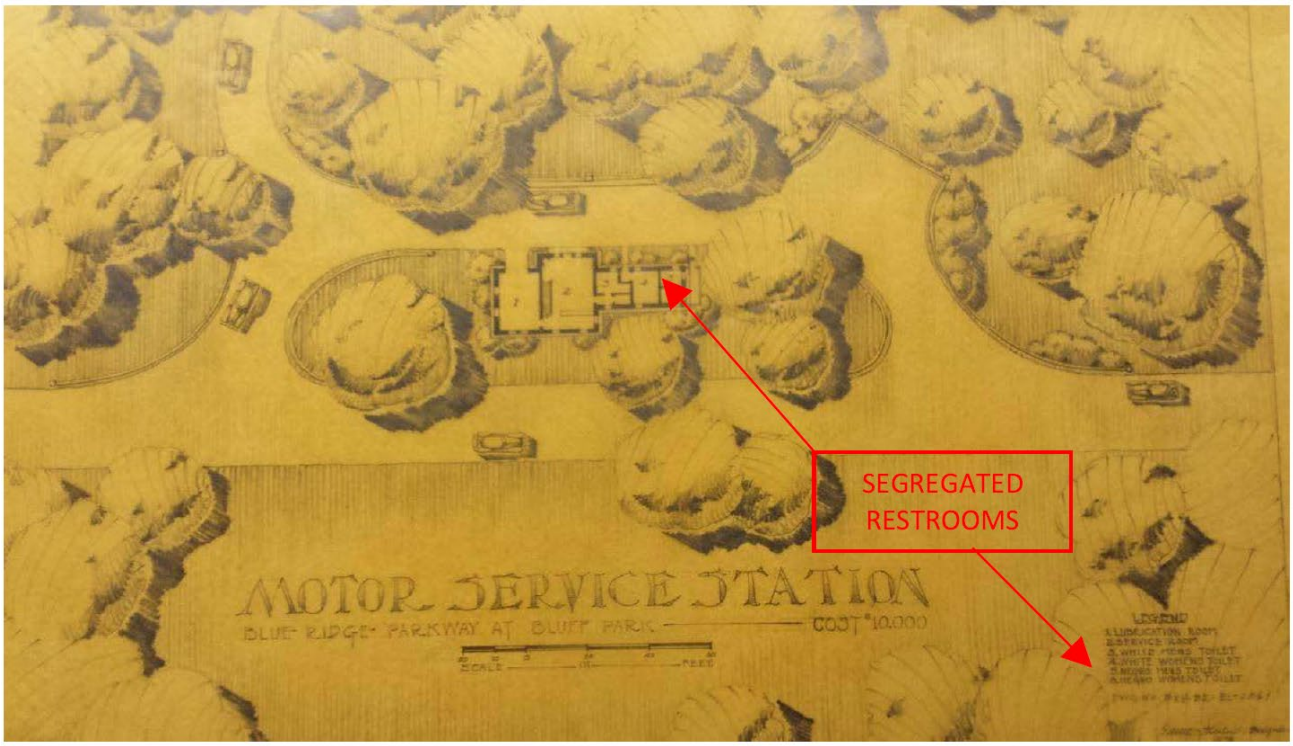


Figure 13. Site plan for Bluff Park Motor Service Station, 1941, including segregated rest rooms. (Source: BLRI Archives, PKY-BR-BL-2061, annotated by Stephanie Heher for *A Long Road: How Jim Crow Affected the Design and Development of Recreational Areas along the Blue Ridge Parkway*)

The Bluffs during World War II (1942–1945)

Infrastructure at The Bluffs was completed by 1942, with roadways, parking areas, and utilities at planned areas including the Bluffs Lodge area.[44]

As noted in the 2006 Doughton Park Cultural Landscape Report, master planning for the recreation areas in the early 1940s ". . . introduced a debate in NPS over the types of activities deemed appropriate for these areas."[45] The Regional Office in Richmond opposed the proposed impound lake with swimming facilities at The Bluffs, and objections were raised to recreational facilities such as playgrounds and ball fields. Abbott "concurred that active recreation uses would intrude on the natural scenery at the recreation areas, and . . . agreed that proposals to develop recreation facilities beside lakes at some distance from the parkway road should be dropped."[46] However, fishing was considered an appropriate recreational activity for The Bluffs, and additional rainbow and brook trout were introduced into Basin and Cove Creeks.[47]

Planning for the lodge area in 1942 also indicates enhancement of existing flora, with trees near the entrance road including red maple (*Acer rubrum*), Table Mountain pine (*Pinus pungens*), white oak (*Quercus alba*), and northern red oak (*Quercus borealis*). The entrance was also to feature plantings at rock ledges including mountain laurel (*Kalmia latifolia*), flame azalea (*Rhododendron calendulaceum*), Catawba rhododendron (*Rhododendron catawbiense*), rosebay rhododendron (Rhododendron maximum), and winterberry (*Ilex verticillata*), as well as hairy rockcress (*Arabia hirsuta*), coral bells (*Heuchera americana*), St. Johnswort (*Hypericum spp.*),

44. *Bluffs Lodge Cultural Landscapes Inventory*, 40.
45. *Doughton Park and Sections 2A, B, and C, Blue Ridge Parkway Cultural Landscape Report*, 51.
46. Firth, *Historic Resource Study,* 252.
47. Sam Weems, *Monthly Report*, July 10, 1942, 59.

sedum (*Sedum spp.*), and Virginia spiderwort (*Tradescantia virginiana*).[48]

The Postwar Years (1946–1956)

During the war years, maintenance staff numbers had been reduced, and amenities were not maintained as well as they had been prior to the war. Only limited maintenance was performed on trails, which deteriorated from erosion. In 1947, foreseeing anticipating increased visitation, trails including those in The Bluffs area were evaluated, and repairs were recommended as needed.[49]

After the war, Superintendent Sam Weems sought to provide food, lodging, and motor services along the parkway, "as envisioned in the prewar plans." In the 1946 Superintendent's Annual Report, Weems noted:

> Of real concern has been the lack of concession facilities. We have had many asked, "Where can we stay," "Where can we eat," "Where can we get car service." We have been encouraged recently to believe that a coffee shop and gas station may be in operation at [the] Bluffs for the 1947 tourist season. There is also the possibility that 25 cabin units may be constructed at this location before the next travel season. This construction is being made possible as a result of an agreement worked out between the National Park Concessions and the American Oil Company. We believe that the operation of a well[-]rounded concession at Bluff will demonstrate the practicality and economy of similar operations elsewhere in the Parkway . . . The need for overnight accommodations and eating facilities within the Parkway will be confirmed by anyone who travels the Parkway without having made reservations and without having purchased picnic supplies for the mid-day lunch.[50]

The Superintendent's Annual Report for 1947 noted: "Long awaited, the first construction on the Parkway of a gasoline station and coffee shop was begun during this year at the Bluffs in North Carolina . . . . Construction of a lodge unit nearby is likewise proposed for completion in time for the 1949 tourist [season]."[51]

After the war, Weems continued as Superintendent of the parkway, and Stanley Abbott assumed the post of Resident Landscape Architect. Abbott left this position in 1949, and Edward Abbuehl became Resident Landscape Architect.[52]

Design and Construction of Bluffs Lodge (1949)

The *Doughton Park Cultural Landscape Report* (2006) notes that design for Bluffs Lodge was a more drawn-out process than efforts during the prewar era.[53] In describing the design process, Edward Abbuehl noted:

> It is significant to note that at this point in time our country was making a transition in tourist facilities from tourist homes and very simple cabins to the early beginnings of what are now known as motels or motor lodges. The combining of several cabin units together into one building seemed like a good idea and the Washington office prepared a preliminary sketch of such a structure that looked like a two story army barracks, for 32 units or rooms. When Stan Abbott went to Washington and saw this preliminary plan he was so stunned as to be almost speechless, but he did recover enough to request Vint to allow the Roanoke office to study the project a little further. The Washington preliminary plan was taken to Roanoke where it was pulled apart at the middle, separated by a patio, the two units bent from a straight line to more nearly fit the topo,

48. *Doughton Park and Sections 2A, B, and C, Blue Ridge Parkway Cultural Landscape Report*, 50, citing 1942 PLUM.
49. Paul W. Van Cleve, *Report to the Resident Landscape Architect on Condition of Trails in Developed Areas*, September 26, 1947, 1, BLRI Archives, RG5, Series 22, Box 29, File 2, 3–4.
50. Quoted in Firth, *Historic Resource Study*, citing Weems 1946 Annual Report
51. Superintendent's Annual Report to the Director, National Park Service, July 1947, 1.
52. Firth, *Historic Resource Study,* 255.
53. *Doughton Park and Sections 2A, B, and C, Blue Ridge Parkway Cultural Landscape Report*, 53.

> and the ground floor on the upper site eliminated to conform to the natural ground slope. The result is the present 24 unit lodge at Doughton Park and with the landscaping it just naturally fits into the scene. Grossman prepared the plans for the building and it was built by the parkway's organization on a force account basis."[54]

Early plans for the lodge indicated one large building with two or more smaller cabins on the hillside below the Wildcat Rocks Overlook parking area. (An early site plan for Bluffs Lodge is shown in Figure 14.) The lodge and cabin area shown on a 1943 utility plan indicated one large lodge building and two smaller elongated outbuildings, with a loop road providing access to the buildings (Figure 15). Additional parking to serve the lodge was to be provided at Wildcat Rocks Overlook, with walkways connecting the lodge, cabins, overlook, and parking areas.[55]

By 1948, the design had reached its current configuration, with two buildings set at an angle with a patio between the two. Rooms on the rear side of the lodge had views of the adjacent meadow, while those on the front faced the single-bay loop parking lot. Drives led to the lodge from the entry road and the entrance to the Wildcat Rocks Overlook parking area. The drawings indicate a double-bay parking lot for future expansion; however, this lot was never constructed. The plan also shows future development of a "Future Lodge Dining Room and Lounge," with an access walk to Wildcat Rocks Overlook and a 24-car parking area.[56]

54. Edward H. Abbuehl, "Architecture on the Blue Ridge Parkway," [manuscript], (BLRI Archives, RG5, Series 41, Box 52, Folder 35,1980), 4–5.
55. *Doughton Park and Sections 2A, B, and C, Blue Ridge Parkway Cultural Landscape Report*, 51.
56. *Roads, Walks and Parking Area, Lodge* [drawing], DSC/ TICS, BLRI, Lodge Roads, Walks & Prkg., Drawing, 2075, 7/1/ 1948.

Figure 14. Site plan for Bluffs Lodge, 1940s, showing the lodge and approach drive. (Source: *Driving through Time* web site, accessed October 2022, https://docsouth.unc.edu/blueridgeparkway/content/8729/)

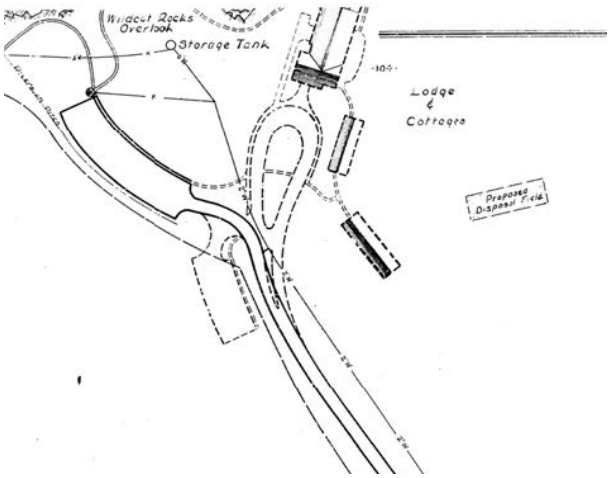


Figure 15. Utility Plan, 1943, showing the proposed lodge and cottages. (Source: 1943, Denver Service Center, TIC)

Existing vegetation in the lodge area included an open meadow, as well as a locust (*Robinia pseudoacacia*), white oak, serviceberry, red oak, and apple trees at the site. A planting plan for the lodge area included shrubs adjacent to the buildings, including rosebay and Catawba rhododendron, mountain laurel, and flame azalea, as well as groundcover and vine species including lowbush blueberry, vinca, and Virginia creeper.[57]

The design for the lodge buildings reflected changes in materials selected for use in construction in the national parks, reflecting a transition toward the development of Mission 66 architecture. While buildings along the parkway constructed prior to World War II were typically designed in a rustic style with hand hewn materials, the lodge design referenced earlier construction in its rustic style but used readily available, less expensive materials such as concrete shingles.

Prewar lodging along the parkway often consisted of individual cabins; however, the layout of The Bluffs, consisting of buildings with individual rooms accessed from a parking lot, is similar to a "motor court" layout popular for hotels. The design also incorporated a paved courtyard between the two buildings where visitors could meet. The courtyard featured a stone fireplace and steps leading to the lower levels of the lodge, together with a stone retaining wall with a parapet on the west side of the court to take advantage of views of the sunset.

According to author Harley Jolley:

> The lodge at Doughton Park is a good example of the landscape architect's touch on the Parkway. It was designed shortly after World War II ended, and according to one architect's opinion, 'The original design looked exactly like a World War II barracks.' Luckily, that design was replaced by one that provided the present day unit which blends so attractively with its surroundings.[58]

In August 1949, Weems noted that ". . . work at The Bluffs Lodge is moving ahead very well, and September 1 is being given as the opening date for Unit B with Unit A to follow in a few days . . . the concessioner will start moving in furniture on August 22."[59] (Figure 16 and Figure 17 show Bluffs Lodge under construction, circa 1949.)

A pathway was constructed leading from the new lodge to Wildcat Rocks Overlook.[60]

The Superintendent's Annual Report for 1950 stated, "Overnight lodging became available for the first time on the Blue Ridge Parkway on September 1" when one unit of the lodge at Doughton Park was opened.[61] (The site and exterior of Bluffs Lodge soon after completion in 1950 are shown in Figure 18 and Figure 19. An exterior view of Bluffs Lodge in 1952 is shown in Figure 20. Interior views of the entrance hall and a double and single room, also in 1952, are shown in Figure 21 through Figure 23.)

57. *Doughton Park and Sections 2A, B, and C, Blue Ridge Parkway Cultural Landscape Report*, 54.
58. Harley Jolley, *Painting with a Comet's Tail* (1987), 23–28.
59. Weems, *Monthly Report*, August 10, 1949, 4.
60. *Doughton Park and Sections 2A, B, and C, Blue Ridge Parkway Cultural Landscape Report*, 55.
61. Superintendent's Annual Report to the Director, National Park Service, 1950, 1.

Figure 16. Bluffs Lodge during construction, circa 1949. (Source: Bluffs Lodge CLI)

Figure 17. Bluffs Lodge during construction, circa 1949. (Source: *Driving through Time* web site, citing NPS Blue Ridge Parkway headquarters, photograph by John Hemmer, accessed October 2022, https://docsouth.unc.edu/blueridgeparkway/content/5928/)

Figure 18. Bluffs Lodge, circa 1950. (Source: Driving through Time web site, citing NPS Blue Ridge Parkway headquarters, photograph by WDL, October 9, 1950, "Bluff Lodge and Signs," accessed October 2022, https://docsouth.unc.edu/blueridgeparkway/ content/3877/)

Figure 19. Bluffs Lodge, 1950. (Source: *Doughton Park Cultural Landscape Report*, Figure 2.44)

Figure 20. Bluffs Lodge, circa 1952. (Source: *Driving through Time* web site, citing NPS Blue Ridge Parkway headquarters, photograph by Sam P. Weems, accessed October 2022, https://docsouth.unc.edu/blueridgeparkway/content/8935/)

Figure 21. Bluffs Lodge entrance hall, circa 1952. (Source: *Driving through Time* web site, citing NPS Blue Ridge Parkway headquarters, photograph by Abbie Rowe, accessed October 2022, https://docsouth.unc.edu/blueridgeparkway/content/3877/)

Figure 22. Bluffs Lodge interior double room, circa 1952. (Source: *Driving through Time* web site, citing NPS Blue Ridge Parkway headquarters, photograph by Abbie Rowe, accessed October 2022, https://docsouth.unc.edu/blueridgeparkway/content/4711/)

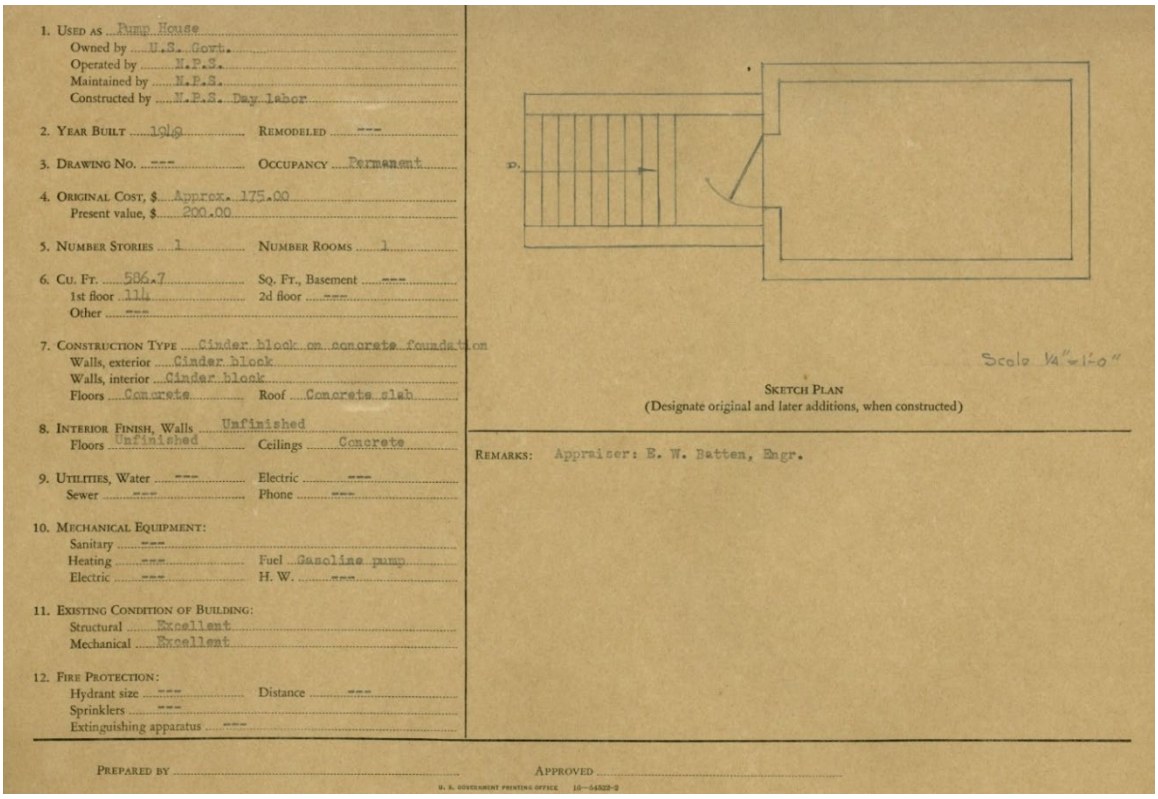
Figure 23. Bluffs Lodge interior single room, circa 1952. (Source: *Driving through Time* web site, citing NPS Blue Ridge Parkway headquarters, photograph by Abbie Rowe, accessed October 2022, https://docsouth.unc.edu/blueridgeparkway/content/8791/)

In 1950, The Bluffs was renamed Doughton Park after North Carolina Representative Robert L. Doughton, who had been a long-time supporter of the parkway. Doughton had chaired the House Committee on Ways and Means and supported financing of the New Deal relief programs that helped the building of the Blue Ridge Parkway and The Bluffs recreation area. A memorial to Doughton was established at the southeast corner of the Overlook Parking area, which consisted of a curved stone retaining wall with integral wood bench and drinking fountain, and a bronze plaque.[62]

In 1952, a pump house was constructed near the existing water tower (Figure 24 and Figure 25).[63] Records indicate the building was constructed by NPS day labor for a cost of approximately $175.00. The building was noted to be constructed of cinder block on a concrete foundation and to comprise 586.7 cubic feet. The interior walls were unfinished.[64]

Figure 24. Photograph of the Bluffs Lodge Pump House, undated but likely 1950s. (Source: Appraisal document, BLRI archives, MP 241.1 #369 cover (pump house).tiff)

62. *Doughton Park Cultural Landscape Report*, 50.
63. *Doughton Park Cultural Landscape Report*, 55.
64. E. W. Batten, Engineer, cover page, appraisal of the pump house, undated. The undated appraisal indicates that the pump house was constructed in 1949; however, other documentation indicates that it was built in 1952.



1. Used as Pump House
Owned by U.S. Govt.
Operated by N.P.S.
Maintained by N.P.S.
Constructed by N.P.S. Day labor

2. Year Built 1940 Remodeled ---

3. Drawing No. --- Occupancy Permanent

4. Original Cost, $ Approx. 175.00
Present value, $ 200.00

5. Number Stories 1 Number Rooms 1

6. Cu. Ft. 586.7 Sq. Ft., Basement ---
1st floor 111 2d floor ---
Other ---

7. Construction Type Cinder block on concrete foundation
Walls, exterior Cinder block
Walls, interior Cinder block
Floors Concrete Roof Concrete slab

8. Interior Finish, Walls Unfinished
Floors Unfinished Ceilings Concrete

9. Utilities, Water --- Electric ---
Sewer --- Phone ---

10. Mechanical Equipment:
Sanitary ---
Heating --- Fuel Gasoline pump
Electric --- H. W. ---

11. Existing Condition of Building:
Structural Excellent
Mechanical Excellent

12. Fire Protection:
Hydrant size --- Distance ---
Sprinklers ---
Extinguishing apparatus ---

Scale 1/4"=1-0"

Sketch Plan
(Designate original and later additions, when constructed)

Remarks: Appraiser: E. W. Batten, Engr.

Prepared by Approved

Figure 25. Bluffs Lodge Pump House, cover page with data and sketch plan, accompanying photograph shown in previous figure. (Source: appraisal document, BLRI archives, MP 241.1 #369 cover (pump house).tiff)

Mission 66 Construction Era (1956–1966)

Mission 66 construction within the Blue Ridge Parkway primarily involved the completion of unfinished portions of the parkway. Funding was also provided for expansion studies. At Doughton Park, several plans were developed for a visitor center at the Coffee Shop area, although a visitor center was never developed at this location. However, the heavily used picnic area and campground were expanded to accommodate additional visitors.[65] In addition, the concrete dam at the water storage reservoir was reconstructed, and interpretive programs increased in the 1950s.[66]

Archival documentation does not indicate any changes to Bluffs Lodge during this period. However, as part of Mission 66 planning for the parkway, expansion of Bluffs Lodge was considered. In January 1957, a report by the North Carolina Board of Conservation and Development described the planned expansion as follows:

> Under the Mission 66 program, plans have been made to expand present guest facilities at Doughton Park. The additional facilities include more dining space to improve visitor service and also increasing the capacity of the present lodge so that the operation here may be made into a profitable, economical operating unit which it is not at the present time.[67]

As proposed in a report of the North Carolina National Park Parkway and Forest Development

65. *Doughton Park Cultural Landscape Report*, 53.
66. *Doughton Park Cultural Landscape Report*, citing Weems, Annual report, 5, 6.
67. Hugh M. Morton, Member, North Carolina Board of Conservation and Development, "Report on Plan for Government-Sponsored Hotels and Eating Places on the Blue Ridge Parkway," January 7, 1957, 14–15, BLRI Archives, RG 3, Records of the Concessions Office, CAT 19859, Series 9 (.1lf) and 14 (.1lf) Report on plan for Government sponsored hotels and eating places on the Blue Ridge Parkway, correspondence and history notes, Box 111 ID 2-198, Folder 1.

Commission, titled "Report on the Question of Construction of Concession Facilities on the Blue Ridge Parkway" and dated July 16, 1957, expansion would have included fifty rooms and additional dining options for the facility.[68]

Post-Mission 66 Era (1967–present)

Visitation to the parkway continued to rise after Mission 66. By 1967, park visitation had reached over nine million persons per year, and by 1975, visitation reached nearly 15 million visitors by 1975. Consideration was again given to expanding Bluffs Lodge in 1968. Drawings from that date illustrate a conceptual plan to add another lodge building and two, twenty-eight-unit hotel buildings to the Bluffs Lodge area (Figure 26).

By 1985, nearly 20 million people visited the parkway, and this number reached more than 20 million by the late 1990s.[69]

At Doughton Park, improvements following the Mission 66 era included updates to utilities. The reservoir system and pump house were abandoned, and a new water supply system using groundwater was constructed in 1973–1974.[70]

Bluffs Lodge remained popular as parkway visitation increased. Due to demand, plans for expansion of the lodge were made during the mid-1970s. Although numerous designs were developed during this time, expansion projects never moved forward. A "Preliminary Design Report for Lodge and Motel Units at Doughton Park on the Blue Ridge Parkway," prepared for National Park Concessions by Ryan Associated Architects of Louisville, Kentucky, and dated January 22, 1971, proposed expansion of the facilities to include thirty new guestrooms and a lodge building with dining area.[71]

In 1980, a renovation study was prepared for Bluffs Lodge and Bluffs Coffee Shop. The study was conducted to "to provide efficient, functional working facilities . . . consistent with current health and safety requirements and accepted building code practices."[72] It further noted, "The Doughton Park Lodge and Coffee Shop is an old facility constructed in 1948. Many aspects of the facility which were a 'state of the art' at the time of construction are obsolete by current standards."[73] Among the conditions noted as needing attention at the buildings were construction not meeting life safety code, including the presence of living quarters in the Building B attic; insufficient attic insulation; lack of weatherstripping and storm windows; worn carpeting, deterioration of interior wall finishes due to condensation; loose stone paving; pointing needed at an outdoor chimney; and a need for accessible facilities.[74]

68. Sam Weems, Superintendent, "Report to North Carolina National Park, Parkway and Forest Development Commission Concerning the National Park Service Concession Plan for North Carolina Sections of Blue Ridge Parkway," February 15, 1957, and North Carolina National Park Parkway and Forest Development Commission, "Report on the Question of Construction of Concession Facilities on the Blue Ridge Parkway, July 16, 1957," BLRI Archives, RG 12, Records of the Division of Maintenance and Engineer, Box 77 ID 2-202, Folders 9 and 10.
69. *Doughton Park Cultural Landscape Report*, 61, citing US Department of the Interior, NPS. *BLRI Annual Report, Fiscal Year, 1998*, 2, BLRI Archives, RG1, Series 3, Box 2 of 2.
70. *Doughton Park Cultural Landscape Report*, 62, citing Weems, 1973 Annual Report, BLRI Archives, RG1, Series 3, Box 2 of 2.
71. Ryan Associated Architects, Louisville, Kentucky, "Preliminary Design Report for Lodge and Motel Units at Doughton Park on the Blue Ridge Parkway, for National Park Concessions," January 22, 1971, BLRI Archives, RG 3, Records of the Concessions Office, CAT 19859, Series 9 (.1lf) and 14 (.1lf) Report on plan for Government sponsored hotels and eating places on the Blue Ridge Parkway, correspondence and history notes, Box 111 ID 2-198, Folder 4.
72. *Bluffs Lodge and Bluffs Coffee Shop Renovation Study,* Lee Wan and Associates, Inc., February 1980, 1.
73. *Bluffs Lodge and Bluffs Coffee Shop Renovation Study*.
74. *Bluffs Lodge and Bluffs Coffee Shop Renovation Study*, 2.

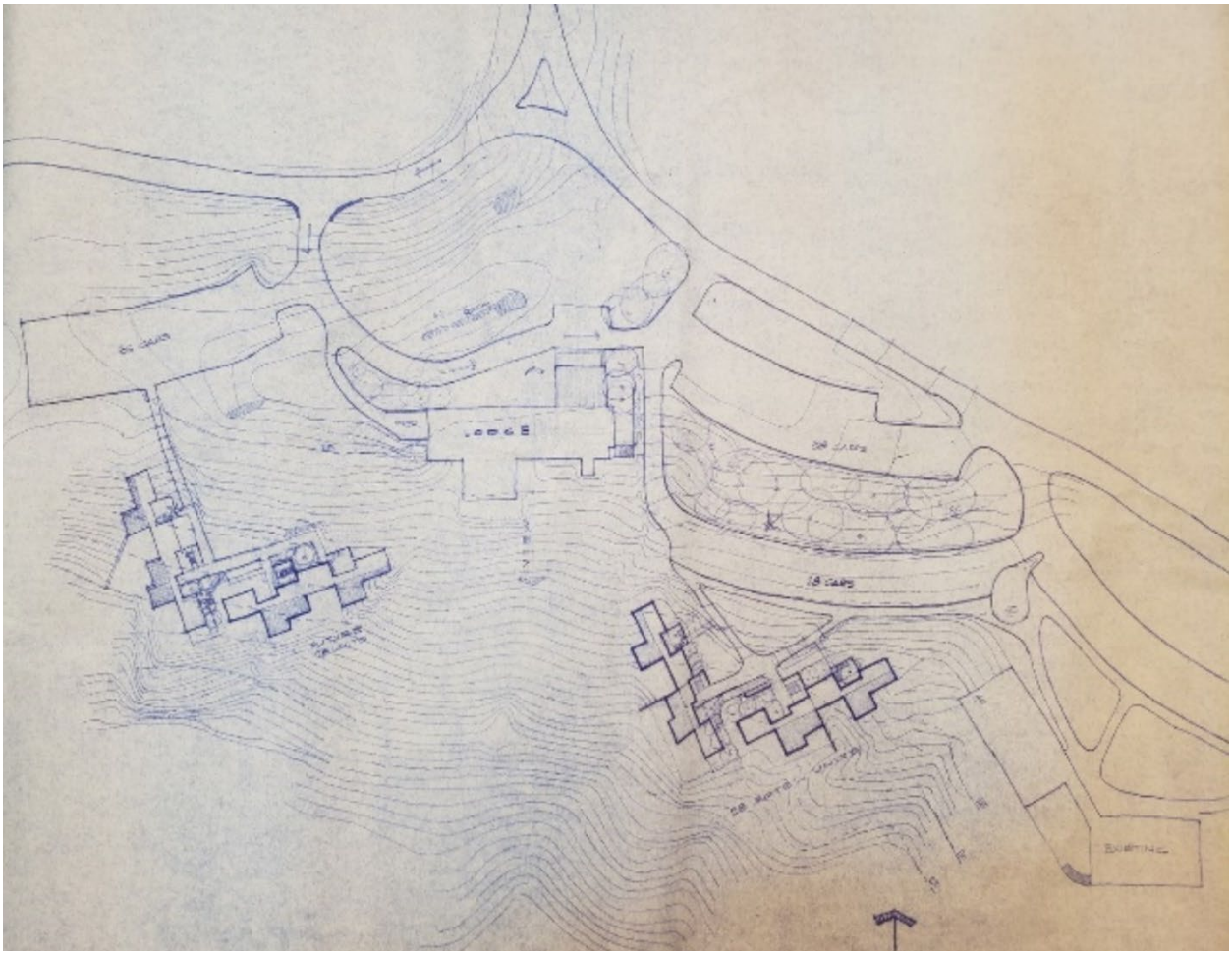


Figure 26. Bluffs Lodge area, conceptual site plan for additional lodge and hotel buildings, 1968. The existing lodge buildings are shown at the lower right in this drawing. (Source: Blue Ridge Parkway archives)

Figure 27. Bluffs Lodge and parking lot, 1970s. (Source: *Driving through Time* web site, citing NPS Blue Ridge Parkway headquarters, photograph by C. E. Westveer, accessed October 2022, https://docsouth.unc.edu/blueridgeparkway/content/8557/)

The report recommendations included repair and upgrading of interior finishes; expansion of bathroom facilities; provision of accessible rooms; installation of new insulation, storm windows, and new carpeting; resetting and repointing of stone paving; rebuilding of wood porch supports and decks at the upper level; rehabilitation of the outdoor chimney; and replacement of the bathroom wall and floor tiles.[75] Based on physical evidence noted as part of this study, the work recommended in the 1980 renovation study was not implemented.

In the early 1990s, the existing 1,500-gallon septic tank at Bluffs Lodge was replaced with a new 3,000-gallon septic tank. The new tank was installed approximately 75 feet south of the buildings, with effluent flowing from the tank to a subsurface drain field approximately 1,000 feet south of the lodge buildings.[76]

In 1997, Historic American Engineering Record (HAER) documentation was prepared for the Blue Ridge Parkway. The documentation included drawings and a written narrative (Figure 28 and Figure 29).

In 2005, replacement light standards were installed in the Bluffs Lodge parking area. These standards were replicas of the previous light fixtures, and they consisted of timber posts with silver metal light fixtures, installed in the same location as the previous parking lot lights.[77]

In 2010, the shingles on the lodge roof were replaced. The replacement work included removal of the existing concrete shingles, limited repair to the roof deck and other elements as needed, and installation of new concrete shingles to match the existing, as well as new gutters and downspouts. The scope of work called for new bituminous coating to be installed at the hidden surface of the gutters and downspouts. It is not known if this coating was installed. New flashing, batten strips, and roofing felt were to be installed as part of the project.[78] Shop drawings for the new concrete shingles noted they were to measure approximately 5/8 inch thick at the exposed edge to 1/4 inch thick at the lap end, and 6 inches to 10 inches wide by 20 inches long, with a raked finish. Reinforcing wire was specified within the concrete shingles. The drawings also noted that the dimensions of the new shingles were based on salvaged concrete shingles from the original roof system installed at Bluffs Lodge, as well as at buildings at Peaks of Otter.[79] According to correspondence with NPS personnel conducted for this HSR, the replacement shingles were produced by a local company, but quality control issues were encountered and shingles of less than desirable quality were installed.[80]

Under a contract followed by letters of authorization extending through December 31, 2010, Forever NPC Resorts, LLC, had operated concession operations at Bluffs Lodge and several other Blue Ridge Parkway sites for ten seasons.[81]

75. *Bluffs Lodge and Bluffs Coffee Shop Renovation Study*, 5.
76. *Bluffs Lodge and Bluffs Coffee Shop Renovation Study*, 62, citing Ray Shaw, e-mail to Bambi Teague, November 2, 2006.
77. *Bluffs Lodge and Bluffs Coffee Shop Renovation Study*, 62, citing Ray Shaw, e-mail to Bambi Teague, November 2, 2006.
78. National Park Service, N5140100048 – Request for Proposal, "Replace Concrete Roof Shingles, Gutters, and Downspouts," undated.
79. National Park Service, "Concrete Shingles, Doughton Park, Blue Ridge Parkway," Drawing No. DP/601-60786, Undated.
80. Correspondence with Greg Robinson, BLRI, June 2022; correspondence with R. Steven Kidd, TIMU (formerly BLRI), October 2022.
81. Bill Butts, Senior Vice President, Forever Resorts, letter to Phil Francis, Superintendent, Blue Ridge Parkway, re: Blue Ridge Parkway concessions operated under contract number CC-WASO001-82, August 19, 2010. (A review comment on the draft HSR from L. Nelson, BLRI, June 2023, noted that the name of the concessioner is Forever NPC Resorts, LLC. The letterhead and text of the August 19, 2010, letter indicate the concessioner name as Forever Resorts, and states that Bluffs Lodge, together with concessions at several

In a letter to Blue Ridge Parkway Superintendent Phil Francis on August 19, 2010, Bill Butts, the senior vice president of Forever NPS Resorts, LLC, explained the firm's decision to cease operating the concessions. He noted that the firm was proud to have operated the properties, stating that "All of our management and staff who have been fortunate to visit the Parkway in carrying out their duties have developed a strong affinity for the Parkway's beauty and the sincere, genuine people of the area." However, the firm had found that:

> . . .despite our efforts over the years, these concession operations have not been financially viable. The small size of each individual operation made cost effective marketing difficult, and the year to year nature of our short-term contract eliminated the consideration of any material operating changes. Operations have been further adversely impacted (particularly at Crabtree Falls) by lengthy road closures resulting from major storms, road washouts, and other natural occurrences.[82]

He added that the Blue Ridge Parkway concession operations might be viable for a smaller operator, rather than a large company headquartered in a distant location, which was the case with Forever Resorts.

The lodge remained open until October 31, 2010, the end of the season for that year. The park then closed the lodge buildings. Other than closing the buildings, based on survey work conducted for this HSR it does not appear that any specific repair or mothballing measures (plumbing, electrical, climate control, ventilation, boarding of windows, doors, or other security features) were undertaken at the buildings at the time. The buildings have remained closed, as the NPS has not been able to identify another concessioner to operate the lodge.

other Blue Ridge Parkway sites, were operated by "Forever-NPCI, an entity managed by Forever Resorts.")

82. Bill Butts, Senior Vice President, Forever Resorts, letter to Phil Francis, Superintendent, Blue Ridge Parkway, re: Blue Ridge Parkway concessions operated under contract number CC-WASO001-82, August 19, 2010.

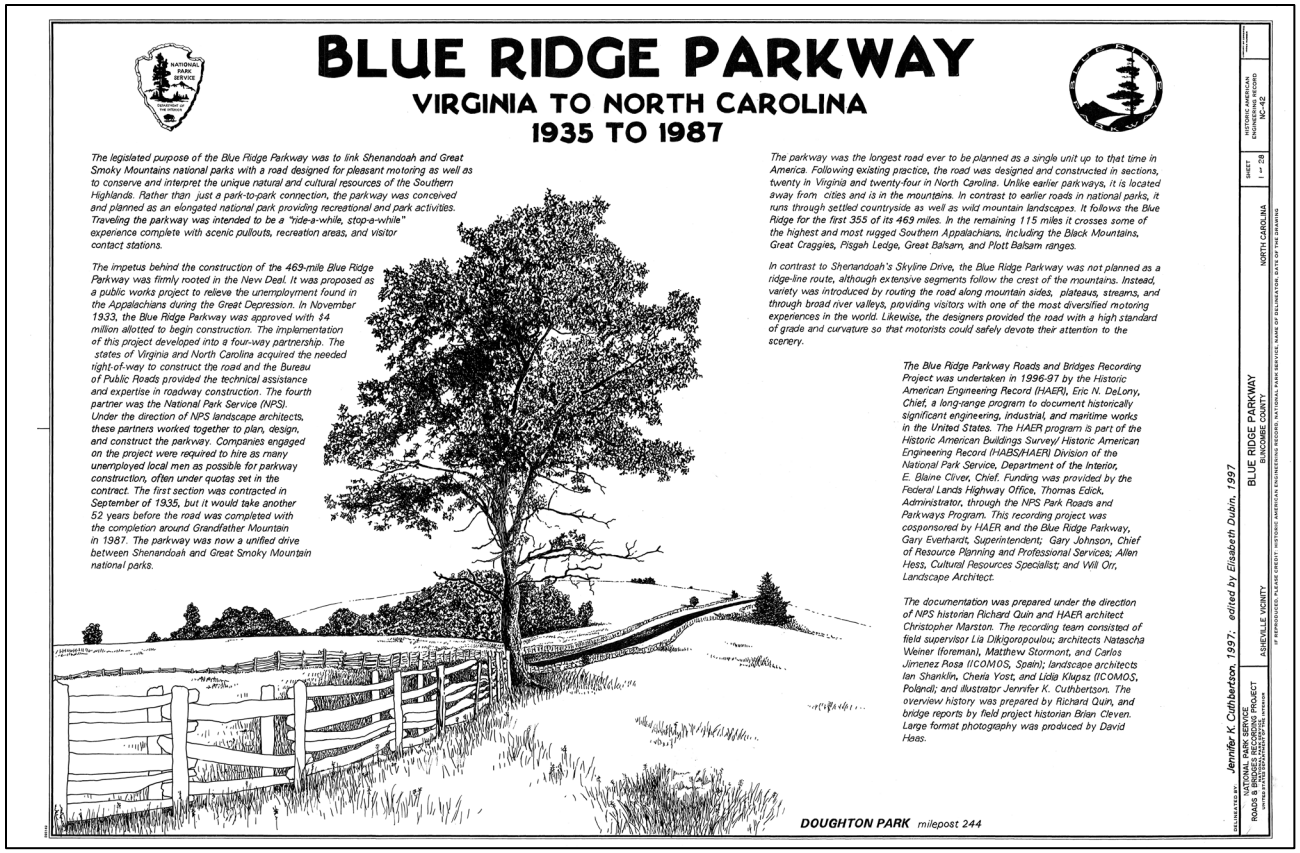


Figure 28. HAER documentation, Blue Ridge Parkway, 1997. (Source: Library of Congress)

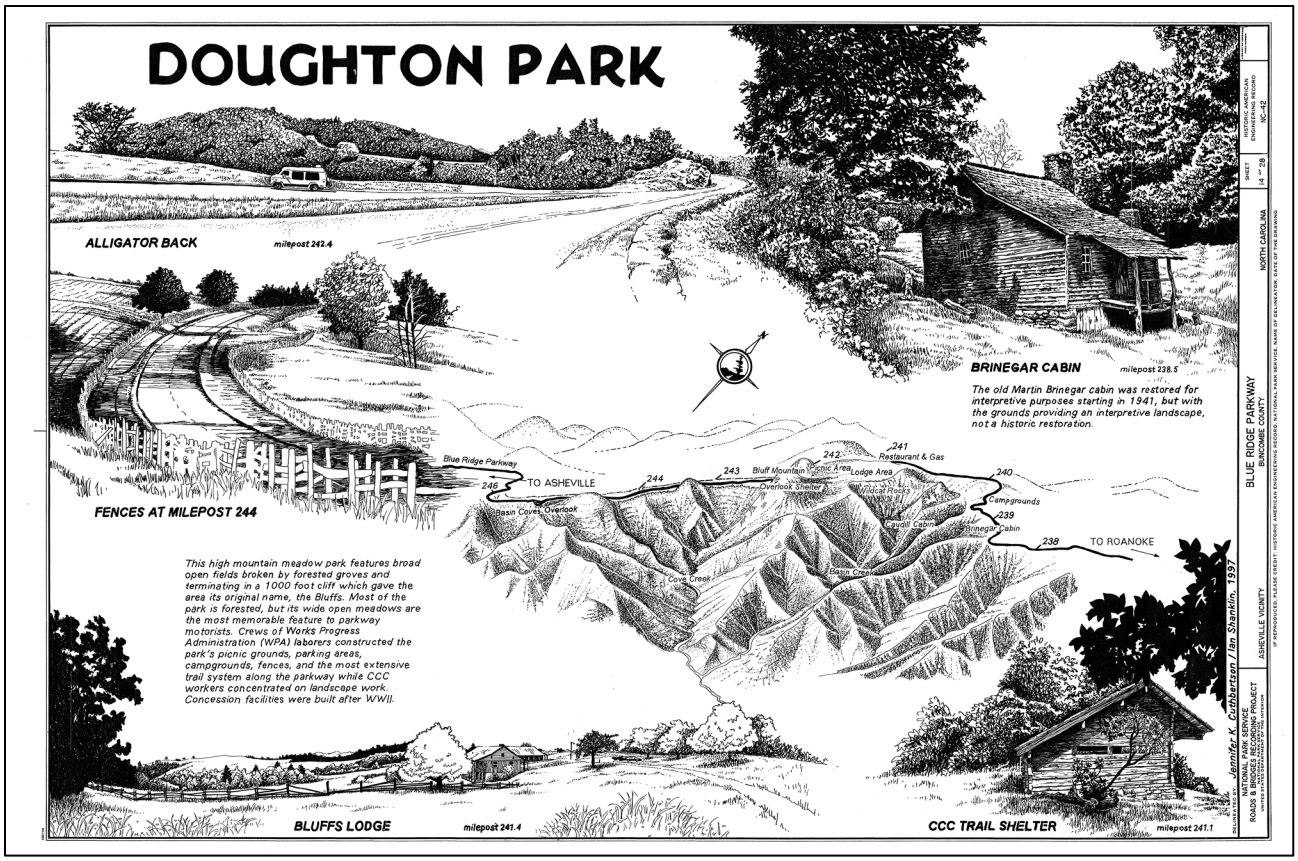


Figure 29. HAER documentation, Doughton Park, Blue Ridge Parkway, 1997. (Source: Library of Congress)

Bluffs Lodge Chronology

1935	Construction of the Blue Ridge Parkway began.
1938	Construction began on entry road leading to the future Bluffs Lodge and Wildcat Rocks Overlook.
1938	Bluffs Lodge Water Tank completed.
1949–1950	Construction of Bluffs Lodge.
1950	Lodge opened to the public on September 1, 1950.
1950	The Bluffs renamed Doughton Park after North Carolina Representative Robert L. Doughton.
1952	Bluffs Lodge Pump House constructed.
1990s	Existing septic tank was replaced by a new tank located 75 feet south of the Lodge.
2005	Replacement light standards installed at the parking lot.
2010	Replacement shingles installed at the lodge buildings.
2010	Concessioner declined to continue operating Bluffs Lodge. The NPS closed the Bluffs Lodge buildings.

Physical Description and Condition Assessment

Site

Bluffs Lodge is located in the Doughton Park area of the Blue Ridge Parkway at milepost 241.1 (Figure 30). Situated south of the parkway, Bluffs Lodge is set into a hillside in a mown turf clearing (Figure 31). An access road leads to a parking area northeast of Bluffs Lodge (Figure 32). The parking lot consists of a single aisle with parking spaces on each side (Figure 33).

An asphalt sidewalk lines the south edge of the parking lot with a set of sidewalks leading to and running parallel to each building (Figure 34). A stone-paved patio is present between the two buildings, overlooking the adjacent landscape (Figure 35).

The access road continues east past the Bluffs Lodge parking lot, where it terminates in a parking lot at the Wildcat Rocks Overlook (Figure 36). Near the overlook is the Bluffs Lodge Water Tank (Figure 37). In a wooded area adjacent to the water tank is the Bluffs Lodge Pump House. An asphalt-paved sidewalk leads from Bluffs Lodge into the wooded area where the pump house is located (Figure 38).

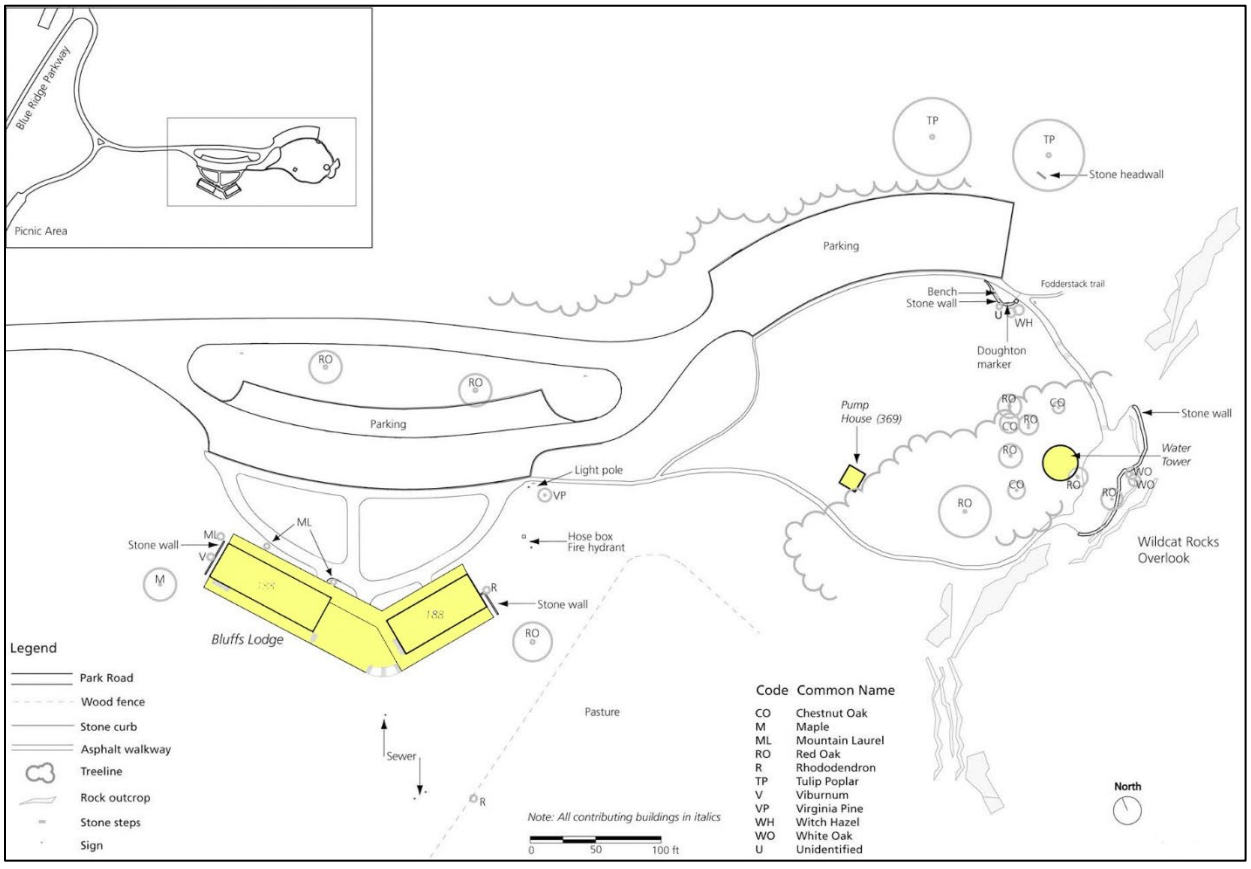


Figure 30. Site plan showing Bluffs Lodge, the Bluffs Lodge Water Tank, and Bluffs Lodge Pump House. (Source: *Bluffs Lodge Cultural Landscape Inventory*, 1998, annotated by the authors)

Figure 31. Bluffs Lodge, view from south. (Source: All photographs by the authors, 2021, unless otherwise noted)

Figure 32. Access road from Blue Ridge Parkway to Bluffs Lodge, view from southeast.

Figure 33. Parking lot at Bluffs Lodge, view from southeast.

Figure 34. Asphalt sidewalks leading from parking area to buildings.

Figure 35. View of adjacent landscape south of Bluffs Lodge.

Figure 36. View of access road, travelling east from Bluffs Lodge.

Figure 37. Bluffs Lodge Water Tank.

Figure 38. Asphalt-paved walk leading to Bluffs Lodge.

Bluffs Lodge

Bluffs Lodge consists of two structures connected by a covered walkway (Figure 39). The complex is roughly V-shaped in plan, with Building A at the east and Building B at the west, and a stone-paved patio at the center. The building is set into a hillside and appears as one-story buildings from the north and two-story buildings from the south.

Figure 39. Bluffs Lodge, view from east. Building A is at the left and Building B is at the right.

A covered walkway connects the two buildings (Figure 40). The wood-framed walkway structure consists of wood columns with wood railings in between the columns. The floor of the walkway, which sits slightly above the adjacent sidewalk, is stone-paved, matching the adjacent covered porches on each building. A set of stone stairs lead from the walkway up to the covered porch at the front of Building B (Figure 41). The walkway has a gabled roof with concrete shingles. Wood gutters line the edge of each side of the roof.

The roof structure of the covered walkway is exposed and consists of 3x6 wood joists at 22 inches on center with a 1x6 ridge beam with tongue-and-groove wood sheathing above (Figure 42).

Figure 40. Covered walkway between buildings.

Figure 41. Stairs leading from covered walkway to Building B.

Figure 42. Exposed roof structure over the covered walkway between the two buildings.

Southwest of the covered walkway is a stone-paved patio (Figure 43). A set of stone stairs leads down to the patio from the adjacent covered walkway to the northeast (Figure 44). Access to the lower level of Building B is provided at the west corner of the patio (Figure 45). A stone wall rises 2 feet from the floor of the patio along the southwest edge (Figure 46). A curved stone stair leads to the ground-level porch at Building A (Figure 47). A 3-foot-tall metal railing is present at the south edge of the stair, with 1/2-inch metal balusters spaced at 4-1/2-inches on center.

A stone stair at the west end of the patio leads down to the ground level of the porch at the southwest side of Building B (Figure 48). Similar to the curved stair to the east, a metal railing is present along the south end of the stair.

Figure 43. Stone-paved patio between buildings.

Figure 44. Stair between stone-paved patio and covered walkway.

Figure 45. Patio and Building B. Stair (not visible) is located at left side of photograph (yellow arrow).

Figure 46. Stone wall along southwest edge of stone-paved patio.

Figure 47. Curved stair leading from stone-paved patio to Building A.

Figure 48. Stair from stone-paved patio to lower level of Building B.

Building A

Exterior. Building A is located on the east side of Bluffs Lodge. The main elevation faces the parking lot to the north (Figure 49). The building is accessible from the asphalt-paved sidewalk north of the building and is connected to the Building B to the west by the covered walkway.

Figure 49. Building A, view from northeast.

Typical exterior finishes on Building A include vertical wood siding, concrete shingle roof, wood windows and doors, stone paving, and wood decking. These finishes conceal wall and floor structural framing.

The building is clad with vertical wood siding consisting of 1x6, 1x8, and 1x10 boards. The boards are laid in a random pattern with 1/8- to 1/4-inch gaps typically present between the siding. Felt paper or another weather barrier appeared to

be installed behind the exterior boards. Wood clapboard siding is present at the gable ends at the east and west ends of the building (Figure 50).

The exterior walls at the lower level of the building consist of stucco installed over concrete masonry units (Figure 51).

Figure 50. West elevation of Building A, showing vertical wood siding and clapboard siding at gable end.

Figure 51. Stucco finish at lower level of Building A.

The roofs at Building A are covered with concrete shingles (Figure 52). The shingles are approximately 1/2 inch thick. Wood gutters line the roof edge of the building (Figure 53). The gutters are triangular in section and consist of two wood boards that meet at the valley of the gutter. Metal straps anchor the gutters to the wood fascia (Figure 54). Metal leaders drain into wood downspouts (Figure 55). There are three downspouts on both the north and south elevations and two at the west elevation. Downspouts are typically adjacent to a wood column.

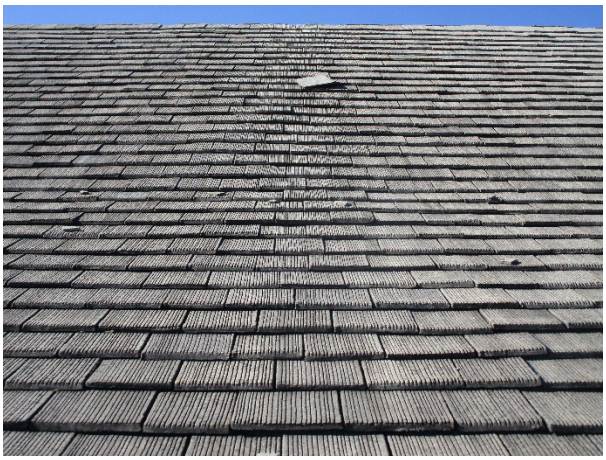


Figure 52. Concrete shingle roof.

Figure 53. Wood gutter with metal leader and wood downspout.

Figure 54. Metal straps at wood gutter.

Figure 55. Metal and wood downspout.

Stone paving is present at the ground level of the covered porch on the south side of Building A and at the covered porch on the north side of the building (Figure 56). Wood decking is exposed at the upper-level porch on the south side of the building. Columns at the porch are typically 6x6 wood posts, while the wood railings consist of three horizontal 2x4s extending between posts, with a perpendicular 2x4 sitting on the top rail (Figure 57).

The porch roof structure at the underside of the roof is exposed (Figure 58). The structure consists of a series of 3x6 wood joists set at 16 inches on center, with tongue-and-groove wood sheathing above.

Figure 56. Stone paving at upper-level porch at the north side of Building A.

Figure 57. Wood columns and railings at the south side of Building A.

Figure 58. Exposed roof structure at ceiling of porch at Building A.

Windows at Building A are typically double-hung wood units. Typical configurations include eight-over-eight and six-over-six windows (Figure 59 and Figure 60). Windows typically have wood-framed screens.

Typical doors at the buildings are six-panel wood doors (Figure 61). Louvered wood screen doors are typically present at each guestroom doorway (Figure 62).

Figure 59. Typical eight-over-eight window.

Figure 60. Typical six-over-six window.

Figure 61. Typical wood door at guestroom.

Figure 62. Typical louvered wood screen door.

The front elevation of Building A faces north (Figure 63). The north elevation is clad with typical vertical wood siding. A covered porch with wood columns and rails lines the north elevation. An entry to the porch is located near the center of the building. Access to four guestrooms is afforded from the north porch. At each guestroom is a typical wood-panel door with wood-louvered storm door, with a typical eight-over-eight window on one side of the door, and a typical six-over-six window on the opposite side (Figure 64). The location of the windows differs, depending on the interior layout of the corresponding guestroom.

Figure 63. North elevation, Building A.

Figure 64. Door and two windows at typical guestroom exterior.

The east elevation of Building A features the gable end, clad in clapboard siding (Figure 65). The upper level of the wall below the gable end is clad in vertical wood siding with the stucco finish at the lower level. The ends of the porches are also visible, with railings at each of the upper floor porches. Three typical eight-over-eight windows are present: two at the upper level and one at the south end of the lower level. A wood ladder is attached to the wall at the south side of the east elevation, directly adjacent to the south porch. A concrete retaining wall is located at the south end of the elevation (Figure 66). A small opening at the west side of the elevation provides access to a crawlspace under the north half of the building (Figure 67).

Figure 65. East elevation, Building A.

Figure 66. Concrete retaining wall at east end of Building A.

Figure 67. Crawlspace opening at east elevation.

Both the lower and upper levels of Building A are visible at the south elevation (Figure 68). Vertical wood siding is present at the upper level, with the stucco finish at the lower level. A two-story covered porch lines the elevation. The porch is supported on wood columns with a wood deck and wood railings at the upper level. Stone paving is present at the lower-level porch with a matching stone base at the adjacent wall.

Access to four guestrooms is afforded at each level of the two-story porch. At each guestroom is a typical wood-panel door with wood-louvered storm door, with a typical eight-over-eight window on one side of the door and a typical six-over-six window on the opposite side (Figure 69). The location of the windows differs, depending on the interior layout of the corresponding guestroom.

Figure 68. South elevation, Building A.

Figure 69. Partial view of south elevation, showing typical window and door configurations.

At the far west end of the south elevation are two stone stairs (Figure 70). The east stair, which runs along the west elevation of the building, provides access between the upper and lower levels of Building A (Figure 71). A simple metal railing extends the length of the east side of the stair. The curved west stair provides access to the central stone-paved patio from the lower level of Building A (refer to Figure 47).

Figure 70. West end of south elevation, showing two stone stairs.

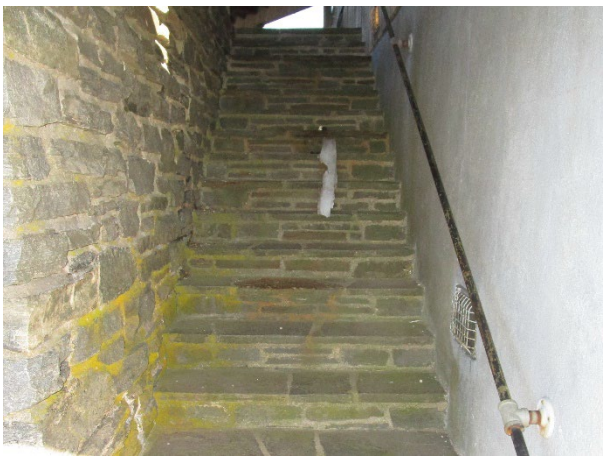


Figure 71. Stone stair leading from ground level to upper level of Building A.

The west elevation of Building A features the gable end as well as an extension of the north covered porch, which provides access to the upper-level guestrooms on the south side of the building (Figure 72). The porch features the typical wood columns and rails seen throughout the building, and it has a stone-paved floor. A wood railing is also present around the stair that runs along the west elevation (Figure 73).

The gable end is clad in wood clapboard siding, while the upper level is clad in vertical wood siding. The typical stucco finish seen at the lower level is also present along the stair that runs along the west elevation (refer to Figure 73).

Figure 72. West elevation, Building A.

Figure 74. Typical guestroom, Building A.

Figure 73. Wood railing at stair along west elevation.

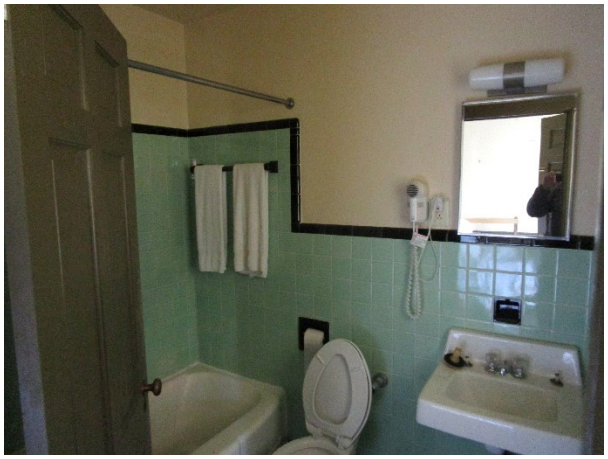


Figure 75. Typical bathroom, Building A.

Interior. The interior of Building A consists of twelve individual guestrooms. Each guestroom consists of a bedroom, bathroom, and closet (Figure 74 and Figure 75). The rooms are arranged so that the bathrooms of every two guestrooms are directly adjacent to each other, allowing for a shared plumbing stack. The bathroom and closet are typically on the same side of the guestroom as the main entry door (Figure 76).

Each guestroom is approximately 18 feet 6 inches wide and 15 feet 6 inches deep. The ground floor rooms are slightly smaller, at 14 feet 6 inches deep.

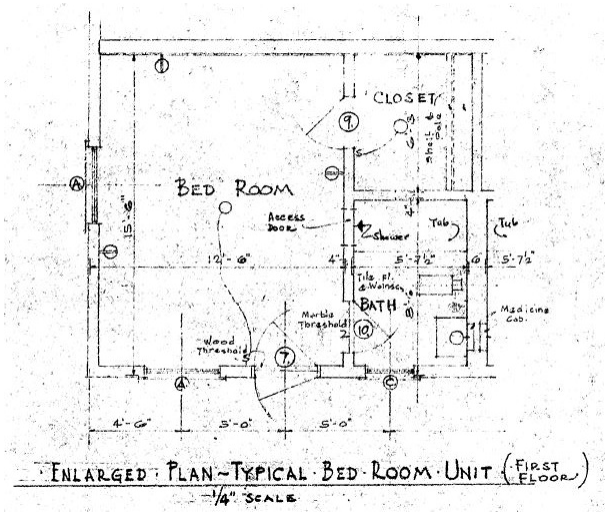


Figure 76. Floor plan showing typical guestroom layout. (Source: *National Park Service, Plans and Design Division, Lodge Unit "A" BLDG. No. 188, Drawing PKY-BRI2073-A, Sheet 4 of 12, June 24, 1948*)

Typical finishes at the interior of Building A, which conceal the structural framing of walls and floors, include carpet flooring and plaster walls and ceiling, with wood wainscot in the bedroom (Figure 77). The wood wainscot consists of a 5-1/4-inch-tall wood base with 7-1/4-inch-wide horizontal wood tongue-and-groove boards with a projecting wood chair rail at the top. The wood wainscot is present at the upper-level guestrooms. Only the 5-1/4-inch-tall wood base is present at the ground-level rooms A heating unit is located below the window at the bedrooms (Figure 78).

Figure 77. Typical guestroom showing typical interior finishes.

Figure 78. Typical heating unit at guestrooms.

Interior doors, which lead from the sleeping room to the closet and bathroom, are six-panel wood doors with 3-1/2-inch-wide wood trim (Figure 79).

Figure 79. Typical six-panel wood door at guestroom interiors.

Typical finishes in the closet include carpet flooring, 5-1/4-inch wood base, plaster walls and ceiling, and a low wood shelf, presumably for luggage storage (Figure 80). A high wood shelf and hanging rod are also present (Figure 81).

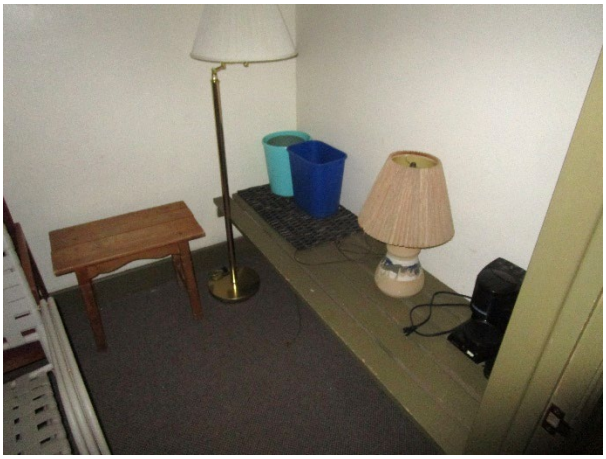


Figure 80. Typical closet, showing luggage shelf.

Figure 81. Wood shelf and hanging rod at typical guestroom closet.

At the bathrooms, typical finishes include tile flooring, tile at the lower half of the walls, and plaster walls and ceiling (Figure 82). The floor tile consists of a pattern of four green 3/4-inch by 1-3/4-inch tile set around a black 3/4-inch by 3/4-inch tile (Figure 83). The wall tile is 4 inches square, with a tile border consisting of 6-inch by 2-inch tile at the edge. The wall tile is also present at the bathtub surround (Figure 84). Each bathroom contains a bathtub with showerhead fixture, toilet, and sink. The toilets appear to be replacement as metal panels are present where the fixture connects to the wall. The sinks are hanging, with exposed pipes below. A metal medicine cabinet with mirror and light is typically located over the sink.

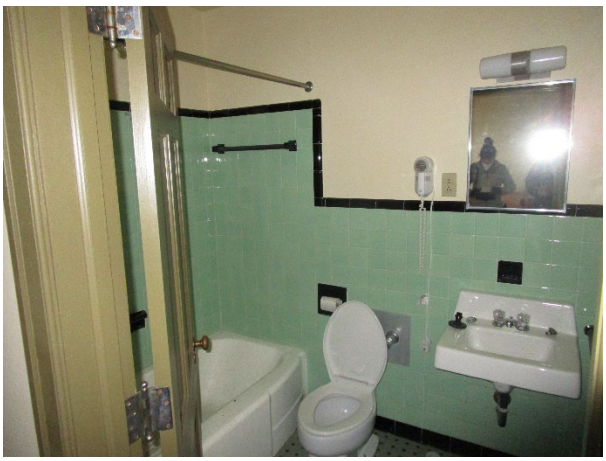


Figure 82. Typical bathroom, Building A.

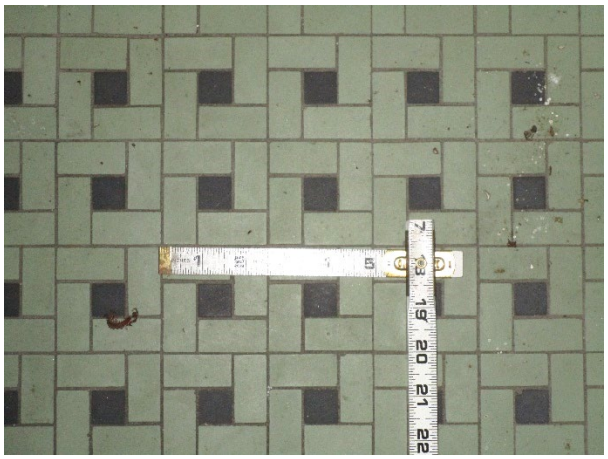


Figure 83. Tile floor at bathroom.

Figure 84. Wall tile over bathtub.

North of the ground-level guestrooms is a crawlspace. Accessible from a small access door at the east elevation, the crawlspace houses plumbing and electrical systems (Figure 85). The back of the concrete masonry wall at the rear of the ground floor guestrooms is visible from the crawlspace.

Figure 85. Crawlspace at the north side of the Building A.

Building B

Exterior. Building B is located on the west side of Bluffs Lodge. The main elevation faces the parking lot to the north (Figure 86). Similar to Building A, Building B is a slightly larger structure with an office and boiler room in addition to twelve guestrooms.

Figure 86. Building B, northeast elevation.

Typical exterior finishes on Building B include vertical wood siding, concrete shingle roof, wood windows and doors, stone paving, and wood decking.

The building is clad with vertical wood siding consisting of 1x6, 1x8, and 1x10 boards. The boards are laid in a random pattern with 1/8- to 1/4-inch gaps typically present between the siding. Felt paper or another weather barrier appeared to be installed behind the exterior boards. Wood clapboard siding is present at the gable ends of each building (Figure 87).

Figure 87. Southwest elevation of Building B, showing vertical wood siding and clapboard siding at gable end.

The lower level of the building consists of stucco installed over concrete masonry units (Figure 88).

Figure 88. Stucco finish at lower level of Building B.

The roofs at Building B have concrete shingles (Figure 89). The shingles are approximately 1/2 inch thick. Wood gutters line the roof edge of each building (Figure 90). The gutters are triangular in section and consist of two wood boards that meet at the valley of the gutter. Metal straps anchor the gutters to the wood fascia (Figure 91). Metal leaders drain into wood downspouts (Figure 92). There are three downspouts on both the northeast and southwest elevations. Downspouts are typically adjacent to a wood column.

Figure 89. Concrete shingle roof.

Figure 90. Wood gutter.

Figure 91. Metal straps at wood gutter.

Figure 92. Metal leader and wood downspout.

Stone paving is present at the ground level of the covered porch on the southwest side of Building B and at the covered porch on the north side of the building (Figure 93). Wood decking is exposed at the upper-level porch on the south side of the building (Figure 94). Columns at the porch are typically 6x6 wood posts, while the wood railings consist of three horizontal 2x4s extending between posts, with a perpendicular 2x4 sitting on the top rail (Figure 95).

Figure 93. Stone paving at upper-level porch at the northeast side of Building B.

Figure 94. Wood columns and railings at the upper-level porch of Building B.

Figure 95. Wood railings along the upper-level porch of Building B.

The porch roof structure at the underside of the roof is exposed (Figure 96). The structure consists of a series of 3x6 wood joists set at 16-inch on center, with tongue and groove wood sheathing above.

Figure 96. Exposed roof structure at ceiling of porch at Building B.

Windows at the buildings are typically double-hung wood units. Typical configurations include eight-over-eight and six-over-six windows (Figure 97 and Figure 98). Windows typically have wood-framed screens.

Figure 97. Typical eight-over-eight window.

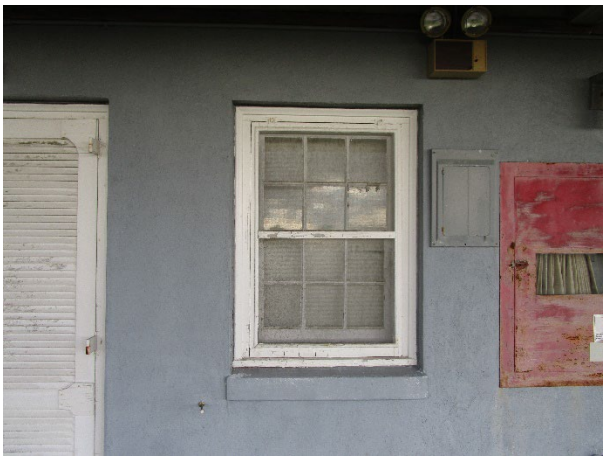


Figure 98. Typical six-over-six window.

Typical doors at the building are six-panel wood doors (Figure 99). Louvered wood screen doors are typically present at each guestroom doorway.

Figure 99. Typical wood door at guestroom.

The front elevation of Building B faces northeast (refer to Figure 86). Typical vertical wood siding is present. A covered porch with wood columns and rails lines the northeast elevation. There are two entrances to the porch, one near each end. The northeast porch provides access to the lodge office and four guestrooms. At the lodge office, on the southeast end of the elevation, are two windows: a typical eight-over-eight window and a six-over six window that is slightly narrower (Figure 100). The door at the office is a multi-panel wood door, with nine-light glass infill at the top with two recessed wood panels below (Figure 101).

Figure 100. Partial view of the northeast elevation, Building B, showing the lodge office.

Figure 101. Door and windows at lodge office.

At each guestroom is a typical wood-panel door with wood-louvered storm door, with a typical eight-over-eight window on one side of the door and a typical six-over-six window on the opposite side (Figure 102, Figure 103, and refer to Figure 99). The location of the windows differs, depending on the interior layout of the corresponding guestroom.

Figure 102. Typical window at guestroom.

Figure 103. Typical window at guestroom.

The southeast elevation of Building B features the gable end, clad in clapboard siding (Figure 104). The main portion of the building is clad in the vertical wood siding, with stone matching the adjacent patio at the base. A stone outdoor fireplace with chimney is centered on the elevation. The ends of the porches are visible, with railings at the southwest porch and a stone stair at the northeast porch leading to the covered walkway. Two six-over-six wood windows are present: one on each side of the fireplace. A three-light window is located southeast of the fireplace at the ground level (Figure 105).

Figure 104. Southeast elevation, Building B.

Figure 105. Three-light window at basement level, southeast elevation.

Both the lower and upper levels of Building B are visible at the southwest elevation (Figure 106). Vertical wood siding is present at the upper level, with the stucco finish at the lower level. A two-story covered porch lines the elevation with wood columns and a wood deck and wood railings at the upper level. Stone paving is present at the lower-level porch, with a matching stone base at the adjacent wall.

Figure 106. Southwest elevation, Building B.

At the west end of the southwest porch, a wood stair connects the upper level with the ground level (Figure 107). A wood railing, similar to that at the upper-level porches, borders the stair opening at the upper level, with a wood gate present at the top of the stair (Figure 108).

Figure 107. Partial southwest elevation showing wood stair between porch levels.

Figure 108. Wood railing and gate at wood stair.

There is access to four guestrooms at each level of the two-story porch. At each guestroom is a typical wood-panel door with wood-louvered storm door. A typical eight-over-eight window is located on one side of the door, and a typical six-over-six window is on the opposite side (Figure 109). The location of the windows differs, depending on the interior layout of the corresponding guestroom.

Figure 109. Partial view of southwest elevation.

At the east end of the building, there is access to the office at the upper level and access to the boiler room and office stair at the lower level (Figure 110). The doors to the office and office stair are similar to the office door at the northeast elevation: multi-panel wood doors with nine-light glass infill at the top and two wood panels at the base (Figure 111). Adjacent to the office stair door at ground level is the boiler room door, a multi-panel metal door with four-light glass infill at top. A wood storm door is also present at the boiler room door (Figure 112 and refer to Figure 111).

Figure 110. East end of southwest elevation showing doors to office and boiler room.

Figure 111. Doors to office stair and boiler room at ground level.

Figure 112. Interior view of boiler room door.

At the upper level, east of the office door, are two six-over-six wood windows. The west window, which corresponds to a bathroom at the interior, is similar to the smaller six-over-six windows seen at the exterior of a typical guestroom. The other window, directly adjacent to the door, is larger, similar to the windows on the southeast elevation.

The northwest elevation of Building B features the gable end, clad in clapboard siding (Figure 113). The upper level of the wall below is clad in vertical wood siding, with stucco finish at the lower level. The ends of the porches are also visible, with railings at each of the upper floor porches. Three typical eight-over-eight windows are present: two at the upper level and one at the west end of the lower level. A six-panel wood door flanked by a six-over-six window and three-light window are present at the northeast end of the elevation (Figure 114). The door provides access to the laundry room. A concrete retaining wall allows access to the door, with a concrete walk leading from the southwest porch. A wood ladder extending from grade to the roof is present near the center of the elevation.

Figure 113. Northwest elevation, Building B.

Figure 114. Northwest elevation, Building B, ground level.

Interior. The interior of Building B consists of twelve individual guestrooms, the lodge office, boiler room, laundry room, and attic. Each guestroom consists of a bedroom, bathroom, and closet (Figure 115 and Figure 116). The rooms are arranged so that the bathrooms of every two guestrooms are directly adjacent to each other, allowing for shared plumbing stack. The bathroom and closet are typically on the same side of the guestroom as the main entry door (refer to Figure 76).

Figure 115. Typical guestroom, ground level, Building B.

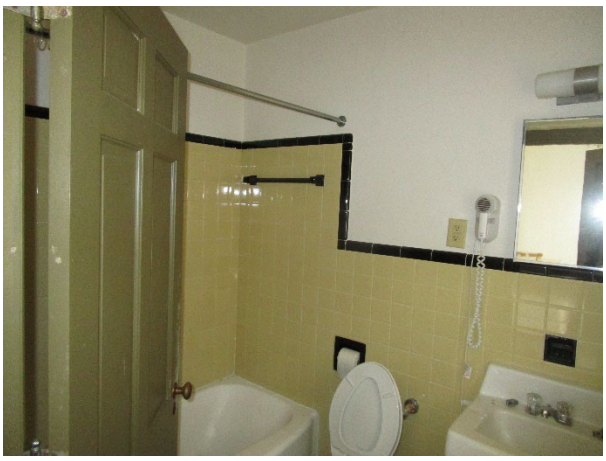


Figure 116. Typical bathroom, Building B.

Each guestroom is approximately 18 feet 6 inches wide and 15 feet 6 inches deep. The ground-floor rooms are slightly smaller, at 14 feet 6 inches deep.

Typical finishes at the interior of Building B include carpet flooring and plaster walls and ceiling, with wood wainscot in the bedroom (Figure 117). The wood wainscot comprises a 5-1/4-inch-tall wood base with 7-1/4-inch-wide horizontal wood tongue-and-groove boards with a projecting wood chair rail at the top. The wood wainscot is present at the upper-level guestrooms. Only the 5-1/4-inch-tall wood base is present at the ground-level rooms. A heating unit is located below the window in the bedrooms (Figure 118).

Figure 117. Typical guestroom, Building B.

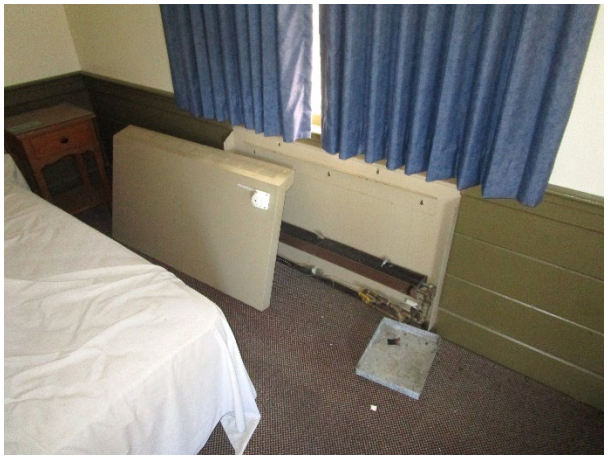


Figure 118. Heating unit, typical guestroom, Building B.

Interior doors, which lead from the sleeping room to the closet and bathroom, are six-panel wood doors with 3-1/2-inch-wide wood trim (Figure 119).

Figure 119. Typical six-panel door.

Typical finishes in the closet include carpet flooring, 5-1/4-inch wood base, plaster walls and ceiling, and a low wood shelf, presumably for luggage storage (Figure 120). A high wood shelf and hanging rod are also present (Figure 121).

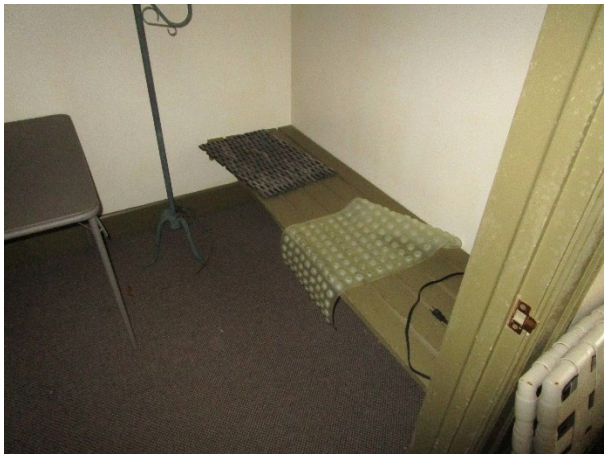


Figure 120. Typical closet, showing luggage shelf.

Figure 121. Wood shelf and hanging rod at typical guestroom closet.

At the bathrooms, typical finishes include tile flooring, tile at the base of the walls, and plaster walls and ceiling (Figure 122). The floor tile consists of a pattern of four yellow 3/4-inch by 1-3/4-inch tile set around a black 3/4-inch by 3/4-inch tile (Figure 123). The wall tile is 4 inches square, with a tile border consisting of 6-inch by 2-inch tile at the edge. The wall tile is also present at the bathtub surround (Figure 124). Each bathroom contains a bathtub with showerhead fixture, toilet, and sink. The toilets appear to be replacement as metal panels are present where the fixture connects to the wall. The sinks are hanging, with exposed pipes below. A metal medicine cabinet with mirror and light is typically located over the sink.

Figure 122. Typical bathroom, Building B.

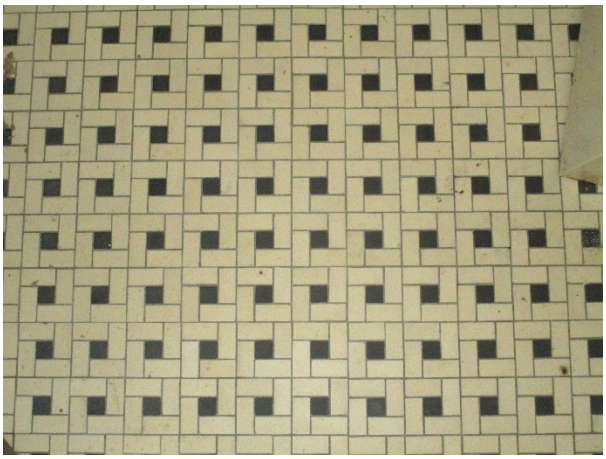


Figure 123. Tile floor at bathroom.

Figure 124. Wall tile over bathtub.

The lodge office at the southeast end of the building consists of a small lobby area, the front desk, a storage room, and a bathroom (Figure 125, Figure 126, Figure 127). The lobby extends the full

depth of the building, with access to the upper level of both porches (Figure 128). Two stairs, one leading to the ground level and another to the attic, are located at the west end of the space (Figure 129 and Figure 130).

Figure 125. Lobby at lodge office.

Figure 126. Front desk, lodge office.

Figure 127. Storage room, lodge office.

Figure 128. Lobby at lodge office.

Figure 129. Lodge office stair to ground level.

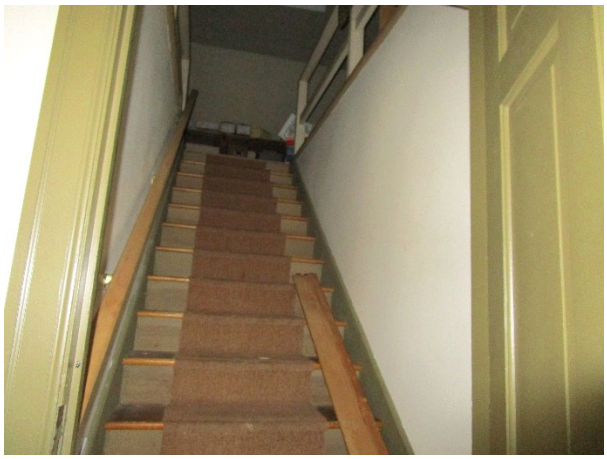


Figure 130. Stair to attic.

Typical finishes in the lodge office include carpet flooring, wood wainscot similar to that in the guestrooms, and plaster walls and ceilings (Figure 131). Doors are typically six-panel wood doors, similar to the other interior doors in the building. A built-in wood desk is located at the wall opening between the office and lobby (Figure 132). The finishes of the wood desk match the wood wainscot in the room. The bathroom has similar finishes to the guestroom bathrooms, with tile floors, tile at the base of the walls, and plaster walls and ceiling (Figure 133).

Figure 131. Lodge office showing typical finishes.

Figure 132. Built-in wood desk at lodge office.

Figure 133. Lodge office bathroom showing typical finishes.

The southeast end of the attic is finished, with wood flooring and plaster walls and ceiling (Figure 134). The northwest end of the attic is unfinished, with the wood roof structure exposed and wood boards at the floor (Figure 135). The wood roof structure consists of 2x10 sloped roof rafters spaced 16 inches on center. At alternating roof rafters, a horizontal collar tie member spans, transversely to the ridge line, across the attic space. The collar is a 1x6 wood member. Tongue-and-groove roof boards span transverse to the roof rafters. The slope of the roof decreases closer to the base of the gable. This is achieved by an additional sloped wood member at the base of the main rafters to which the tongue-and-groove roof boards are attached (Figure 136). Attic floor framing was visible from the platform; however, this framing was inaccessible for close-up inspection. The floor framing consists of 2x wood joists with batt insulation.

Figure 134. Finished portion of attic, Building B.

Figure 135. Unfinished attic, Building B.

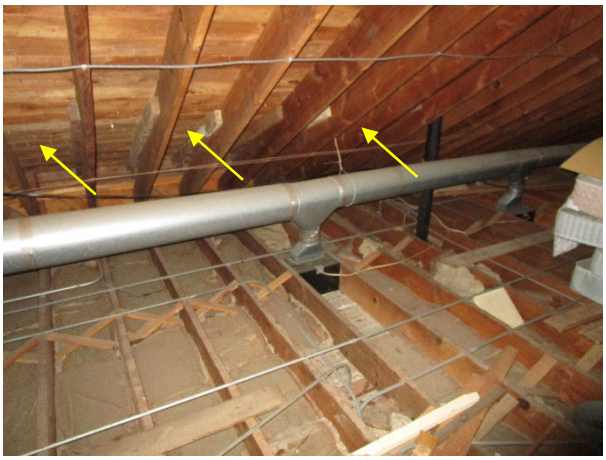


Figure 136. View of roof framing from attic. Note the change in slope at the base of the gable (yellow arrows).

The boiler room is at the southeast end of the ground floor (Figure 137). The two-room space has plaster walls and ceilings and concrete floors (Figure 138).

Figure 137. Boiler room.

Figure 138. Boiler room.

The laundry room is located at the northwest end of the ground floor. Access to the laundry was not able to be provided as part of this study.

Bluffs Lodge Water Tank

The Bluffs Lodge Water Tank is located approximately 500 feet southeast of Bluffs Lodge, and it consists of a cylindrical holding tank that sits atop four steel-frame supports and a central water tower column (Figure 139). The capacity of the water tank is 30,000 gallons. The steel supports sit on concrete foundations (Figure 140). A concrete foundation is also present at the base of the water tank column (Figure 141).

Figure 139. Bluffs Lodge Water Tank, view from southwest.

Figure 140. Concrete foundation at steel-frame support.

Figure 141. Concrete foundation at the base of the water tower column.

The steel-frame supports are approximately 12 inches square in section and are composed of a series of steel members (Figure 142). Two clevis and turnbuckles cross at each elevation, connecting the steel-frame supports (Figure 143).

Figure 142. Steel-frame supports.

Figure 143. View of water tank showing clevis and turnbuckles between supports (yellow arrow).

At the holding tank, a steel railing is present at the perimeter of a small walkway (Figure 144). A steel ladder provides access up the side of the holding tank from the walkway.

Figure 144. Steel railing at the perimeter of holding tank.

Bluffs Lodge Pump House

The Bluffs Lodge Pump House is located in a wooded area southeast of Bluffs Lodge (Figure 145). The pump house measures approximately 13 feet 5 inches long and 8 foot 8 inches wide. The building is sited slightly below grade and has a concrete foundation. A concrete stair on the southwest elevation leads from grade down to the pump house (Figure 146 and Figure 147). The stair and landing measures 7 feet 6 inches long and 6 feet wide and contains four steps. Concrete retaining walls, 8 inches thick, are present at each side of the stair. A landing, 3 feet 6 inches deep, is present at the base of the stair.

The pump house has concrete masonry unit walls and a 4-inch-thick concrete roof that overhangs the wall approximately 1 foot (Figure 148).

Figure 145. Pump house, view from south.

Figure 146. Southwest elevation, pump house.

Figure 147. Stair at southwest elevation.

Figure 148. Pump house, showing concrete masonry unit walls and overhanging concrete roof.

A two-panel metal door leads into the pump house (Figure 149). The lower panel contains a louver. Metal louvers are present at the upper portion of the northeast and northwest elevations (Figure 150 and Figure 151).

Figure 149. Metal door at pump house.

Figure 150. Northwest elevation, pump house.

Figure 151. Northeast elevation, pump house. Note metal louver.

The interior of the pump house consists of a single space (Figure 152). The floor, walls, and ceilings are all concrete, with concrete block at the upper portion of the walls (Figure 153). Pump equipment sits on concrete curbs within the pump house (refer to Figure 152). The pump was manufactured by Cummins, as indicated by labels on the equipment. (The date of installation of the pump is not indicated in documentation available for this study.)

Figure 152. Interior of pump house. Note equipment on concrete curbs.

Figure 153. Interior of pump house, showing concrete masonry unit wall and concrete ceiling.

Condition Assessment

Bluffs Lodge

The majority of distress conditions observed at Bluffs Lodge are related to exposure to the elements on the exterior of the buildings, leading to normal aging of materials, and water infiltration and water-related damage on the interior of the buildings. Deferred maintenance has contributed to deterioration of exterior wood elements. Deterioration of the roof shingles is potentially

related to materials problems with the replacement shingles presently in place.

Covered Walkway and Stone-paved Patio. The following notable conditions were observed at the covered walkway and stone-paved patio between the two buildings at Bluffs Lodge:

- Cracked, deteriorated, and missing mortar at joints in the stone paving at the covered walkway (Figure 154). Organic growth is present at some of the open mortar joints.
- Cracked and loose stone units at the stair between the covered walk and stone-paved patio (Figure 155). Evidence of prior unsuccessful repair includes what appears to be newer mortar under loose and displaced stone pavers (Figure 156). Both the older and newer mortar appear to be a cement/sand mortar. (Materials studies were not conducted as part of this scope of work to identify the specific mortar types present.) The current condition of the stone presents a tripping hazard.
- Cracked, deteriorated, and missing mortar at joints in the stone wall at the base of the covered walkway adjacent to the stone-paved patio (Figure 157).
- Cracked, deteriorated, and missing mortar at joints in the wall along the south edge of the stone-paved patio (Figure 158). Evidence of previous repair, including newer mortar, is visible in the mortar joint directly below the coping stone (Figure 159). In many instances, the newer mortar is cracked and deteriorated.

Figure 154. Cracked and deteriorated stone paving at the covered walkway.

Figure 155. Cracked and loose stone units at stair between the covered walkway and patio.

Figure 156. Displaced stone pavers at stair. Note newer mortar beneath units.

Figure 157. Cracked, deteriorated, and missing mortar at joints in the stone wall at the base of the covered walkway.

Figure 158. Cracked, deteriorated, and missing mortar at joints in the stone wall along the edge of the stone-paved patio.

Figure 159. Signs of previous mortar repair at the stone wall along the edge of the stone-paved patio.

- Organic growth is prevalent at joints between stone units at the stone-paved patio (Figure 160).
- Isolated, cracked mortar joints between stone units throughout the stone-paved patio (Figure 161).
- Cracked, loose, and displaced stone units at the stair between the stone-paved patio and the ground-level porches at both buildings (Figure 162, Figure 163, and Figure 164). Near the top of the stair leading to Building A, the stone units appear displaced (Figure 165). The current condition of the stone at both locations presents a tripping hazard.
- Cracked, deteriorated, and missing mortar at the outside walls along the south edge of the stone-paved patio (Figure 166). Step cracking along mortar joints is present.
- Corrosion and paint failure at the metal rails along the stone stairs to ground-level porches at each building (Figure 167).

Figure 160. Organic growth between stone units at the stone-paved patio.

Figure 161. Cracked mortar joints between stone units at the stone-paved patio.

Figure 164. Displaced stone at the stair leading to the ground level of Building B.

Figure 162. Cracked and displaced stone units at the curving stair leading to the ground level of Building A.

Figure 165. Displaced stone at the stair leading to the ground level of Building A.

Figure 163. Cracked and displaced stone units at the curving stair leading to the ground level of Building A.

Figure 166. Cracked, deteriorated, and missing mortar at the outside walls along the south edge of the stone-paved patio.

Figure 167. Corrosion and paint failure at the metal rails along the stone stairs.

Building A. The following notable conditions were observed at Building A:

Exterior

- Split wood siding at the gable ends (Figure 168 and Figure 169).
- Loose and displaced wood trim and louvers at the east elevation (Figure 170).
- Warped wood at the south elevation, where vertical wood siding meets the wood decking of the porch (Figure 171).
- Deteriorated coating at the stucco finish at the west end of the south elevation (Figure 172).

Figure 168. Split wood clapboard siding.

Figure 169. Split wood clapboard siding.

Figure 170. Loose and displaced wood trim and louvers at the east elevation.

Figure 171. Warped vertical wood siding at the south elevation.

Figure 172. Deteriorated coating at the stucco finish.

Figure 173. Hairline cracking at the stucco finish.

Figure 174. Hairline cracking at the stucco finish.

- Hairline cracking at the stucco finish at ground level at the south elevation (Figure 173 and Figure 174).
- Damaged and missing wood-louvered storm doors (Figure 175).
- Biological growth at the wood-louvered storm doors at the ground floor (Figure 176).
- Deteriorated and cracked paint at the wood windows and associated wood-framed screens (Figure 177).
- Deteriorated and missing glazing putty at wood windows throughout the building (Figure 178 and Figure 179).
- Cracked, loose, and displaced concrete roof shingles (Figure 180).
- Heavily deteriorated wood at gutters throughout the building (Figure 181 and Figure 182).
- Organic growth at the wood gutter at the east end of the north elevation (Figure 183).

Figure 175. Damaged and missing wood-louvered storm doors

Figure 176. Biological growth at a wood-louvered storm door.

Figure 177. Deteriorated and cracked paint at the wood windows and associated wood-framed screens.

Figure 180. Cracked, loose, and displaced concrete roof shingles.

Figure 178. Deteriorated and missing glazing putty.

Figure 181. Deteriorated wood at gutter.

Figure 179. Deteriorated and missing glazing putty.

Figure 182. Deteriorated wood at gutter.

Figure 183. Organic growth at gutter.

Figure 184. Peeling paint at an upper-floor guestroom ceiling.

Interior

- Cracked and peeling paint at plaster walls and ceilings at upper-level guestrooms (Figure 184 and Figure 185).
- Plaster damage at walls and ceilings at the ground-floor guestrooms (Figure 186). Damage appears to be related to water and/or moisture infiltration.
- Damaged and deteriorated wood trim at ground-floor guestrooms (Figure 187).
- Possible organic growth at plaster walls and ceilings (Figure 188). This condition is isolated at upper-level guestrooms, but prevalent throughout all ground-floor guestrooms (Figure 189).
- Paint failure at interior painted wood doors and trim at ground-level guestrooms (Figure 190).
- Possible organic growth at carpet in guestroom 103A on the ground floor (Figure 191).

Figure 185. Cracked paint at an upper-floor guestroom wall.

Figure 186. Plaster damage at ground-floor guestroom ceiling.

Figure 187. Damaged and deteriorated wood trim at a ground-floor guestroom.

Figure 188. Possible organic growth at plaster walls and ceiling at an upper-level guestroom.

Figure 189. Possible organic growth at plaster walls and ceiling at a ground-level guestroom.

Figure 190. Paint failure at wood door.

Figure 191. Possible organic growth at carpet in guestroom 103A.

Building B. The following notable conditions were observed at Building B:

Exterior

- Split, deteriorated, and missing wood siding at the gable ends (Figure 192 and Figure 193). This condition is most prevalent where the roof of the covered walkway intersects with the southeast elevation (Figure 194).
- Deteriorated and missing vertical siding at the southeast elevation (Figure 195). Deteriorated siding is directly below the location where the gutter insects with the building.
- Biological growth on wood siding at the northwest elevation (Figure 196 and Figure 197).
- Hairline cracking at the stucco finish at the ground level (Figure 198).
- Deteriorated coating at the stucco finish along the base of the upper-level porch (Figure 199 and Figure 200).
- Displaced and potentially loose stone at the top of outdoor stone fireplace and chimney (Figure 201). The HSR team promptly notified park staff on site and followed up with an e-mail to the park and the NPS Contracting Officer's Representative that this could be a possible safety hazard and that access to the patio should be restricted until it could be verified that the stone was not at risk of falling.
- Deteriorated and missing glazing putty at wood windows throughout the building (Figure 202 and Figure 203).
- Deteriorated and cracked paint at the wood windows and associated wood-framed screens (Figure 204).
- Missing glass panel at office stair door at ground level (Figure 205).
- Damaged and missing wood-louvered storm doors (Figure 206 and Figure 207).

Figure 192. Split clapboard siding at gable end.

Figure 193. Deteriorated clapboard siding at gable end.

Figure 194. Deteriorated and missing wood siding where the roof of the covered walkway intersects with the southeast elevation.

Figure 195. Deteriorated and missing siding below a gutter.

Figure 196. Biological growth at wood siding.

Figure 197. Biological growth at wood siding.

Figure 198. Hairline cracking at the stucco finish at the ground level.

Figure 199. Deteriorated coating at stucco finish along the base of the upper-level porch.

Figure 200. Deteriorated coating at the stucco finish along the base of the upper-level porch.

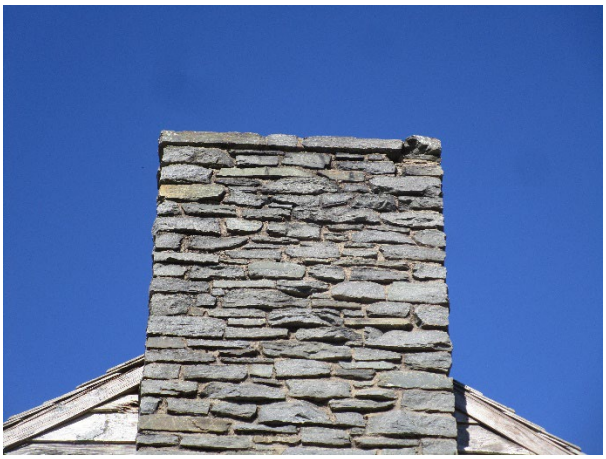


Figure 201. Displaced and potentially loose stone at the top of outdoor stone fireplace and chimney.

Figure 204. Deteriorated and cracked paint at the wood windows and associated wood-framed screens.

Figure 202. Deteriorated and missing glazing putty at a wood window.

Figure 205. Missing glass panel at office stair door at ground level (yellow arrow).

Figure 203. Deteriorated and missing glazing putty at a wood window.

Figure 206. Partially missing wood-louvered storm door. Only a portion of the door remains at the right.

Figure 207. Damaged and detached wood-louvered storm door.

Figure 209. Detached wood railing element at the upper level of the southwest porch.

Figure 208. Damaged screen door at ground-level door to laundry room.

Figure 210. Cracked, loose, and displaced concrete roof shingles.

- Damaged screen door at ground-level door to laundry room (Figure 208).
- Detached wood railing element at the upper level of the southwest porch (Figure 209).
- Cracked, loose, and displaced concrete roof shingles (Figure 210 and Figure 211).
- Heavily deteriorated wood gutters throughout building (Figure 212).
- Displaced downspout at west end of gutter at the front porch (Figure 213). Water from metal downspout appears to be bypassing wood downspout below.
- Detached wood and metal downspout elements at the southwest porch (Figure 214 and Figure 215).

Figure 211. Cracked, loose, and displaced concrete roof shingles.

Figure 212. Deteriorated wood gutters.

Figure 213. Displaced downspout at west end of gutter at the front porch.

Figure 214. Detached wood and metal downspout elements at the southwest porch.

Figure 215. Hole in gutter at location of detached metal leader to wood downspout at the southwest porch.

Interior

- Cracked and peeling paint at plaster walls and ceilings at upper-level guestrooms (Figure 216).
- Plaster damage at walls and ceilings at the ground-floor guestrooms (Figure 217). Damage appears to be related to water and/or moisture infiltration.
- Possible organic growth at plaster walls and ceilings (Figure 218). This condition is isolated at upper-level guestrooms, but prevalent throughout all ground-floor guestrooms (Figure 219).

Figure 216. Cracked and peeling paint at plaster walls.

Figure 217. Plaster damage at ceiling at a ground-floor guestroom.

Figure 218. Possible organic growth at plaster walls and ceiling of upper-level bathroom.

Figure 219. Possible organic growth at plaster walls and ceiling at ground-floor guestroom.

Bluffs Lodge Water Tank

Observed deterioration at the water tank is primarily related to exposure to the elements and, in the case of graffiti, vandalism. The following notable conditions were observed at the Bluffs Lodge Water Tank:

- Graffiti at the base of the central water tower column (Figure 220 and Figure 221).
- Biological growth at the base of the steel supports (Figure 222). This condition was also noted at the holding tank (Figure 223).
- Isolated surface corrosion at the steel walkway around the holding tank (Figure 224).

Figure 220. Graffiti at the base of the central water tower column.

Figure 221. Graffiti at the base of the central water tower column.

Figure 222. Biological growth at the base of the steel supports.

Figure 223. Biological growth at the holding tank.

Figure 224. Surface corrosion at the steel walkway around the holding tank.

Bluffs Lodge Pump House

Observed conditions at the pump house are primarily related to exposure to the elements. The following notable conditions were observed at the Bluffs Lodge Pump House:

- Corrosion at the metal pump house door and frame (Figure 225).
- Organic growth at the roof of the pump house (Figure 226).

Figure 225. Corrosion at the metal pump house door and frame.

Figure 226. Organic growth at the roof of the pump house.

Hazardous Materials

In conjunction with the condition assessment, an Assessment of Hazardous Materials of Bluffs Lodge was completed by SEMS, Inc. As part of this survey, a visual survey of the building interior and exterior was conducted to identify suspect asbestos-containing materials, suspect lead-based paint and lead-containing materials, and suspect biological contamination in the form of mold or mold-like substances. The assessment recommends laboratory analysis to determine whether asbestos-containing materials are present, as well as an inspection of the exterior and interior of the buildings to determine whether lead-based paint is present. A collection of a soil sample in the location of a form tank pit is recommended to confirm that no leaks or spills occurred prior to its removal. Additionally, the assessment recommends cleaning of the buildings to remove organic growth. Prior to implementation of a cleaning program, a remediation work plan should be developed to guide removal of biological contamination present in the buildings.

The findings of the Assessment of Hazardous Materials are included in Appendix B, Assessment of Hazardous Materials.

Significance and Integrity

National Register of Historic Places

The National Register of Historic Places is the official list of the nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act of 1966, the National Park Service's National Register of Historic Places is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources.[83]

The significance evaluation identifies the important historical associations of the property and comments on its architectural, archeological, and social value as they relate to the National Register of Historic Places. A property's significance is tied to a discrete period of time in which its important contributions were made and to relevant national, state, and local historic contexts.

Significance Criteria

For a property to be eligible for inclusion in the National Register of Historic Places, it must possess significance under one of four criteria. The Criteria for Evaluation for listing in the National Register of Historic Places state:

> The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:
>
> A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
>
> B. That are associated with the lives of persons significant in our past; or
>
> C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
>
> D. That has yielded, or may be likely to yield, information important in prehistory or history.[84]

In addition, the Criteria for Evaluation identify Criteria Considerations that address cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past fifty years are not considered eligible for the National Register—but which will qualify for the National Register if they fall within certain categories. The Criteria Considerations do not pertain to the resources addressed in this HSR, thus are not further discussed here.[85]

83. National Park Service, "National Register of Historic Places" accessed August 18, 2023, https://www.nps.gov/subjects/nationalregister/database-research.htm.
84. *Code of Federal Regulations*, Title 36, Part 60, The National Register Criteria for Evaluation."
85. *Code of Federal Regulations*, Title 36, Part 60, The National Register Criteria for Evaluation."

National Register Significance Evaluation

The following significance evaluation addresses Bluffs Lodge and the nearby Bluffs Lodge Pump House and Bluffs Lodge Water Tank. Previous assessments of significance completed for the Cultural Landscape Inventory (2001) and Cultural Landscape Report (2006) addressed the overall Bluffs Lodge cultural landscape as part of the Blue Ridge Parkway as a historic district.

The Cultural Landscape Inventory (CLI) for Bluffs Lodge (2001) notes that the Bluffs Lodge cultural landscape has been determined eligible for listing in the National Register as a contributing resource as part of a historic district. The North Carolina State Historic Preservation Office (SHPO) concurred with this determination in consensus documentation dated September 8, 2004.[86] The North Carolina SHPO also recently concurred that Bluffs Lodge, Bluffs Lodge Water Tank, and Bluffs Lodge Pump House are contributing resources within the Blue Ridge Parkway, which is eligible for listing in the National Register of Historic Places, in review of the draft submittal for this Historic Structure Report and Determination of Eligibility for Bluffs Lodge.[87] Bluffs Lodge, the Bluffs Lodge Water Tank, and the Bluffs Lodge Pump House, as historic resources within the Blue Ridge Parkway, are considered eligible for listing in the National Register of Historic Places as contributing structures to the Blue Ridge Parkway Historic District, within the Doughton Park recreation area. Although no nomination documentation exists for these structures, a Determination of Eligibility for these resources is being prepared in conjunction with this HSR. Concurrently with preparation of this HSR, a National Historic Landmark (NHL) nomination is being prepared for the Blue Ridge Parkway by others. The draft nomination reviewed for reference in this HSR submittal notes that the lodge is a contributing resource.[88]

The CLI notes that the significance level is national, and that National Register Criteria C and A pertain, as well as Criteria Consideration G, a property achieving significance within the past fifty years if it is of exceptional significance.[89] The areas of significance cited in the CLI are transportation, landscape, architecture, and conservation.[90]

Bluffs Lodge, constructed in 1949, is significant as one of the first lodges to be designed and constructed along the parkway and for its planning and architecture. The lodge was designed following the goals of NPS parkway planners and architects in the rustic style of pre-World War II park architecture, so that buildings and structures would blend with the natural environment. The configuration of the building reflects regional architecture, but the building uses simpler and more cost-effective materials than were typically used in prewar park buildings; for example, roofing on the lodge is concrete shingles rather than hand-hewn shakes. The lodge reflects this change in architectural style, which presaged the move to more modernist architecture during Mission 66. In addition, rather than creating a series of individual cabins as seen in many earlier park lodging developments, Bluffs Lodge follows a "motel"-type arrangement, with long buildings

86. National Park Service, *Bluffs Lodge, Blue Ridge Parkway - Highlands District, Cultural Landscape Inventory,* (2001), 6. Note that the SHPO consensus included in the Cultural Landscape Inventory pertains to the Blue Ridge Parkway overall.
87. Ramona Bartos, Deputy State Historic Preservation Officer, letter to Andrew Triplett, National Park Service, Blue Ridge Parkway, re: Determination of Eligibility and Historic Structure Report, Bluffs Lodge, 45385 Blue Ridge Parkway, Laurel, Alleghany County, ER 22-2843, undated (transmitted with e-mail of January 13, 2023, and noted as in response to Andrew Triplett e-mail of November 17, 2022).
88. Stephen Olausen, Melissa J. Andrade, Jill Chin, the Public Archeology Laboratory – Final Documentation; Jacqueline Bass, Susan Cianci Salvatore, and Ian Firth, University of Georgia – Previous Drafts; *Blue Ridge Parkway. National Historic Landmark nomination* (revised draft), April 2023.
89. *Bluffs Lodge Cultural Landscape Inventory*, 15.
90. *Bluffs Lodge Cultural Landscape Inventory*, 17.

containing individual units opening onto a common parking area.

The water tank is one of the earliest structures built at the site, as part of infrastructure for The Bluffs, which is one of the first developed areas to be constructed along the parkway.

The pump house, completed in 1952, is also a contributing resource as part of the associated development supporting Bluffs Lodge.

Period of Significance

The NHL documentation for the Blue Ridge Parkway identifies a period of significance for the parkway extending from 1933, when the project was initiated, to 1987, when the last segment of the parkway was completed.[91] The draft NHL documentation identifies four periods of parkway construction with this overarching period of significance: 1) the New Deal (1933–1941), during which the parkway was conceived, its route and design principles established, and a large portion of the roadbed was constructed; 2) post-World War II (1946–1955), when construction resumed following the war; 3) Mission 66 (1956–1966), when funding for completion of most of the roadway was provided through the NPS Mission 66 program, and the visitor center concept was introduce; and 4) Final Construction Phase (1967–1987), when the Linn Cove Viaduct was constructed and the final segment of the parkway was completed, opening the parkway for travel along its entire 469-mile length.[92]

As noted in the *Bluffs Lodge Cultural Landscape Inventory*, while parkway road development possesses NHL significance for the period 1933–1987, ". . . associated development—such as lodge sites—possesses NHL significance only through 1955."[93] The lodge, water tank, and pump house at Bluffs Lodge were constructed prior to 1955 and fall into this period. Specific periods of significance pertaining to these resources are as follows:

Bluffs Lodge: 1949–1955

Bluffs Lodge Water Tank: 1938–1955

Bluffs Lodge Pump House: 1952–1955

The period of significance for the lodge, water tank, and pump house addressed in this HSR begins with the date of construction of the individual resource and concludes with the end date of the period of significance for the recreation areas of which these resources are a part.

Character-Defining Features

The historic nature of significant buildings and structures is defined by their character, which is embodied in their identifying physical features. Character-defining features can include the shape of a building; its materials, craftsmanship, interior spaces, and features; and the different components of its surroundings.[94]

The following list identifies existing character-defining features of the Bluffs Lodge structures.

Bluffs Lodge

- Siting of buildings and relationship to the landscape to the south and parking area and roadway to the north.
- General configuration of the lodge, including separate buildings connected by a covered walkway with an open patio in between.
- Configuration of the lodge buildings, with rectangular footprints and shallow sloped roofs.
- Covered porches at the front and rear of the buildings.

91. Olausen, Firth, et al., *Blue Ridge Parkway National Historic Landmark Documentation*.
92. Olausen, Firth, et al., *Blue Ridge Parkway National Historic Landmark Documentation*.
93. *Bluffs Lodge Cultural Landscape Inventory*, 2.
94. Lee H. Nelson, FAIA, *Preservation Brief 17: Architectural Character: Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character* (Washington, DC: National Park Service, Technical Preservation Services, 1988).

- Vertical wood siding and horizontal clapboard siding at gable ends.
- Stucco cladding at lower levels.
- Concrete roof shingles and gable roofs
- Multi-light wood windows.
- Multi-panel wood doors.
- Stone-paved walkways and patio.

Bluffs Lodge Pump House

- General configuration of the structure.
- Siting of structure partially underground.
- Overhanging concrete roof.
- Concrete unit masonry walls.

Bluffs Lodge Water Tank

- Shape and configuration of the water tank.
- Holding tank at the top of the structure and adjacent railed walkway and ladder.
- Steel-frame supports.

Assessment of Integrity

Assessment of integrity is based on an evaluation of the existence and condition of the physical features which date to a property's period of significance, taking into consideration the degree to which the individual qualities of integrity are present. The seven aspects of integrity as defined in the National Register Criteria for Evaluation are location, design, setting, materials, workmanship, feeling, and association. As noted in the National Register Bulletin, *How to Apply the National Register Criteria for Evaluation*:

> Location is the place where the historic property was constructed or the place where the historic event occurred. . . . Design is the combination of elements that create the form, plan, space, structure, and style of a property. . . . Setting is the physical environment of a historic property. . . . Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. . . . Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. . . . Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. . . . Association is the direct link between an important historic event or person and a historic property.[95]

The property must retain the essential physical features that enable it to convey its historical significance. The essential physical features are those features that define both why a property is significant (National Register criteria) and when it was significant (period of significance). The National Register Bulletin, *How to Apply the National Register Criteria for Evaluation*, defines integrity as "the ability of a property to convey its significance."[96]

Integrity of Location. The structures at Bluffs Lodge retain integrity of location. The location of the structures has remained unchanged since original construction.

Integrity of Design. The structures retain integrity of design. While alterations have been made, particularly to Bluffs Lodge, they have not altered the form or style of the structures. All structures reflect the design aesthetic of early parkway planning and construction.

Integrity of Setting. The structures retain integrity of setting. The relationship of the structures to the surrounding site and to one another remains intact.

Integrity of Materials and Workmanship. Although alterations have been made, particularly

95. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (Washington, DC: US Department of the Interior, National Park Service, National Register, History and Education, 1990, rev. 1995), 44–45.
96. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation.*

to Bluffs Lodge, the structures retain integrity of materials and workmanship.

Integrity of Feeling. The structures retain integrity of feeling and continue to convey their historic character.

Integrity of Association. The structures and adjacent site retain integrity of association as part of the Blue Ridge Parkway. The structures reflect the principles developed by parkway planners during the planning process in the 1930s and 1940s.

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Treatment and Use

Requirements for Treatment and Use

The following discussion of treatment and use for Bluffs Lodge, the pump house, and the water tank has been prepared based on historical research, condition assessment, and discussion with the National Park Service to understand intended current and future use of the building. The lodge, pump house, and water tank are considered contributing structures to the Blue Ridge Parkway Historic District and survive with sufficient integrity to convey their historic association.

As such, treatment and use of the structures should be considered within the context of the legal mandates and policy directives established by National Park Service Cultural Resources Management Guideline (Director's Order 28), as well as the *Secretary of Interior's Standards for the Treatment of Historic Properties*, for the protection of cultural resources. As part of the historic district. Bluffs Lodge is currently not in use and has been mothballed. The pump house and water tank continue to be used.

Laws, Regulations, and Functional Requirements

Key laws, regulations, and functional requirements that apply to the recommended work include the following:

- National Park Service *Cultural Resources Management Guideline* (Director's Order 28), which requires planning for the protection of cultural resources on park property.
- Section 106 of the National Historic Preservation Act, which mandates that federal agencies, including the National Park Service, take into account the effects of their actions on properties listed or eligible for listing in the National Register of Historic Places and give the Advisory Council on Historic Preservation a reasonable opportunity to comment.

Treatment of the building and site are also to be guided by the following:

- *Secretary of Interior's Standards for the Treatment of Historic Properties*
- National Park Service Management Policies, 2006
- Architectural Barriers Act Accessibility Standards (ABAAS)
- International Building Code (IBC), 2021
- International Existing Building Code (IEBC), 2021
- International Plumbing Code (IPC)
- National Electrical Safety Code (NESC)
- National Fire Protection Association (NFPA) 101: Life Safety Code (LSC), 2015 and NFPA 1 Uniform Fire Code
- NPS Guiding Principles of Sustainable Design

The State of North Carolina has adopted the 2015 IBC, with amendments and the 2015 IEBC with amendments for statewide applicability. The National Park Service is self-regulating in terms of enacting and enforcing building code standards. Bluffs Lodge is therefore not legally subject to local or state building code requirements. When undertaking repairs to buildings structures, the National Park Service endeavors to have the work comply with model building code standards. At

this time, the 2021 International Building Code is the model building code used by the NPS for design and construction.

With historic structures, attempts to achieve strict conformance with model building code standards that are intended for new buildings can lead to destruction of the historic fabric. Alternative compliance procedures, such as Chapter 12 of the IEBC relating to historic buildings, should be referenced in determining code compliance. For Bluffs Lodge, alternatives to full prescriptive legislative and code compliance should be considered where such compliance would compromise the integrity of the structure.

The 2021 IEBC includes the following statements in Section 507, Historic Buildings:

> 507.1 Historic buildings. The provisions of this code that require improvements relative to a building's existing condition or, in the case of *repairs*, that require improvements relative to a building's pre-damage condition, shall not be mandatory for historic buildings unless specifically required by this section.
>
> 507.2 Life safety hazards. The provisions of this code shall apply to *historic buildings* judged by the building official to constitute a distinct life safety hazard.
>
> 507.3 Flood hazard areas. Within flood *hazard areas* established in accordance with Section 1612.3 of the *International Building Code*, or Section R322 of the *International Residential Code*, as applicable, where the work proposed constitutes substantial improvement, the building shall be brought into compliance with Section 1612 of the *International Building Cod*e, or Section R322 of the *International Residential Code*, as applicable:
>
> Exception: *Historic buildings* need not be brought into compliance that are:
>
> 1. Listed or preliminarily determined to be eligible for listing in the National Register of Historic Places;
>
> 2. Determined by the Secretary of the U.S. Department of Interior as contributing to the historical significance of a registered historic district or a district preliminarily determined to qualify as an historic district; or
>
> 3. Designated as historic under a state or local historic preservation program that is approved by the Department of Interior.[97]
>
> 507.4 Structural. Historic buildings shall comply with the applicable structural provisions in this chapter.
>
> Exceptions:
>
> 1. The *code official* shall be authorized to accept existing floors and existing live loads and to approve operational controls that limit the live load on any floor.
>
> 2. Repair of *substantial structural damage* is not required to comply with Sections 405.2.3, and 405.2.4. *Substantial structural damage* shall be repaired in accordance with Section 405.2.1.

The IEBC exceptions noted above pertain to Bluffs Lodge as a contributing property within a National Register-listed Historic District.

In addition, the National Park Service provides guidance on sustainability in work on historic structures, in terms of energy efficiency, technology, and sustainable preservation in practice, as described in *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings*.[98]

97. International Code Council, Inc., *International Existing Building Code 2021* (Country Club Hills, Illinois: International Code Council, 2020).
98. Anne E. Grimmer, with Jo Ellen Hensley, Liz Petrella, and Audrey T. Tepper, *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings* (Washington, DC: US Department of the Interior, National Park Service, Technical Preservation Services, 2017).

Also, newly installed electrical systems and components, including any significant alterations to existing electrical systems, should comply with applicable provisions of the NFPA 70: National Electrical Code (NEC).

Alternatives for Treatment and Use

The National Park Service has developed definitions for the four major treatments that may be applied to historic structures: preservation, rehabilitation, restoration, and reconstruction. The four definitions are as follows:

> **Preservation** is defined as the act or process of applying measures necessary to sustain the existing form, integrity, and materials of an historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses upon the ongoing maintenance and repair of historic materials and features rather than extensive replacement and new construction. New exterior additions are not within the scope of this treatment; however, the limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project.
>
> **Rehabilitation** is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.
>
> **Restoration** is defined as the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project.
>
> **Reconstruction** is defined as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.[99]

Of the four treatment approaches, *rehabilitation*, which involves making possible a compatible use through repair, alterations, or additions, is most appropriate for the Bluffs Lodge structures. This treatment would allow for the repairs necessary to preserve and maintain the structures, while permitting renovation to meet the needs of park management and allow continuing use, especially of the lodge. Potential changes that would be permitted under the rehabilitation treatment approach include accessibility improvements at the exterior and interior of the lodge to allow for overnight accommodations. Additionally, interior changes to the pump house, including changes to the equipment, could be made to permit continued use.

Retention of original materials and character-defining features during rehabilitation work is practical and appropriate, and it will also assist in the interpretation of the lodge, pump house, and water tower as part of the Bluffs Lodge complex and Doughton Park recreation area of the Blue Ridge Parkway.

Preservation, which involves sustaining the building in its existing form, is to some extent in progress as a result of ongoing repair and cyclical maintenance implemented by the park, and it is considered overly limiting for structures that are contributing to a historic district but not individually significance. Also, preservation efforts would be incorporated in the overarching rehabilitation treatment approach. *Restoration*, which would return the lodge to its appearance during the period of significance, is also considered overly limiting for a contributing but not individually significant structure, and it could also limit continued use.

99. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*.

Ultimate Treatment and Use

Potential Approaches

Several approaches may be considered for the future use and disposition of Bluffs Lodge. Ideally, given the significance and historic character of the buildings, they could be adapted for a compatible continued use. Such use could include lodging (continuing the historic use of the property) or potentially another function, such as conference center or a visitor contact station and museum.

The park has noted that, given the small number of rooms present in the two existing structures, additional rooms may be required to make continued use as lodging financially feasible. Additional lodging units could be provided in an addition to the existing buildings or in a new building located nearby. The overarching treatment Rehabilitation permits additions, exterior alterations, and related new construction. Rehabilitation standard no. 9 notes that these changes "will not destroy historic materials, features, and spatial relationships that characterize the property."[100] Rehabilitation standard no. 9 also notes: "The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment."[101] Additions and/or new construction would need to be carefully constructed to respect the historic fabric and character of the existing buildings, site features (e.g., plaza, breezeway), spatial relationships between the buildings and within their setting, and the surrounding natural landscape. Rehabilitation standard no. 10, which states that new additions and adjacent or related new construction ". . . will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired," is also relevant if additions and/or new construction are considered.[102] (The Standards for Rehabilitation are provided for reference below.)

If the park plans to retain the buildings, and pending further consideration of reuse of the buildings, the building exteriors should be repaired to provide an intact, weathertight building enclosure. The building interiors should be treated to remove mold and mildew, and climate control and ventilation should be provided to protect the building interiors from deterioration and recurrence of biological growth.

Should the NPS determine that it is not financially possible to sustain the operation of the buildings or to pursue reuse as an option, we understand that at some time in the future the park may need to remove the buildings. Demolition could be considered; however, given that the Bluffs Lodge buildings and structures are contributing resources to the Blue Ridge Parkway historic district and have been determined contributing to an eligible district by the North Carolina SHPO, documentation would be required prior to their removal. Documentation in mitigation of demolition for contributing buildings and structures often consists of Historic American Buildings Survey (HABS)-level recordation, including a narrative history, description, and statement of significance; record photographs; and record drawings. Documentation should address both the lodge buildings and site, and the water tower and pump house if the latter structures are scheduled for demolition rather than reuse. The specific scope and level of detail required for this documentation would need to be determined by the NPS in coordination with the North Carolina SHPO. The current Historic Structures Report

100. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*.
101. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*.
102. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings.*

could provide the basis for development of such documentation.

Guidelines for Treatment

Guidelines and recommendations for treatment for Bluffs Lodge have been defined based on the objectives and requirements for treatment and use outlined above. All treatment guidelines and recommendations were developed in accordance with the Secretary of Interior's Standards for Rehabilitation.

The Secretary of the Interior's Standards for Rehabilitation are as follows:

1. A property will be used as it was historically, or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.

3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.[103]

The following guidelines are based on the potential reuse of the buildings, for continued use as lodging or for another compatible use:

- Undertake all work on the structures in compliance with the *Secretary of the Interior's Standards for Rehabilitation.*
- Retain the character of the historic structures and environs by protecting the structures and significant site features.
- Ensure that proposed new elements or construction are compatible with the historic character of the structures and site.

103. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings.*

- Protect adjacent natural resources during construction activities.
- Document through detailed as-built drawings, photographs, and written narrative all changes and treatments to the structures and site. Maintain records of treatments and preserve documentation according to professional archival standards. Maintain a copy of records in NPS archives.
- Retain features and materials at both the exterior and interior of the structures that survive from the period of significance to the greatest extent possible.
- Incorporate sustainable design principles in all future projects that respect the preservation principles listed above.

Should removal of the buildings be determined by the NPS to be necessary:

- Ensure that HABS-level documentation, or other documentation determined by the NPS in consultation with the North Carolina SHPO, is completed prior to demolition.

Recommendations

The following specific recommendations for treatment of the Bluffs Lodge structures respond to the overarching treatment approach of *rehabilitation* to allow for modification for continued use, while retaining and protecting historic and character-defining features.

Prioritization of Recommended Repairs

Specific recommendations for the Bluffs Lodge structures are provided below. Repairs to provide an intact, weathertight building envelope should be completed as soon as possible, even if the buildings are to remain unoccupied in the near future. Repairs pertaining to paving and railings should also be performed to provide for visitor safety. For the building interiors, general cleaning including treatment of interior building surfaces affected by mold and mildew should be performed. In addition, limited climate control and ventilation should be provided, sufficient to prevent high humidity levels within the buildings and to avoid recurrence of mold and mildew. Other repairs to the exterior and interior of the building can be performed as needed as a basis for continued or adaptive reuse once reuse is confirmed.

Bluffs Lodge

Exterior

- At locations where cracked, deteriorated, and missing mortar is present at stone paving, the damaged mortar should be removed, and new mortar should be installed. Where loose stone units are present, existing stone units should be removed and reset in new mortar. All new mortar should match the existing in color, finish, and composition.
- Cracked stone paving units should be replaced with new stone units that match the existing in type, color, and size.
- Cracked, deteriorated, and missing mortar at the stone wall should be removed and replaced with new mortar. All new mortar should match the existing in color, finish, and composition.
- Metal railings where corrosion and failed paint was observed should be cleaned, primed, and repainted. New paint should match the existing color.

Building A Exterior

- Deteriorated, split, and otherwise damaged wood siding should be removed and replaced with matching wood siding.
- Decayed wood at siding, trim, window and door frames, and decorative elements should be removed and new wood dutchman or replacement units installed. The dutchman or new units should match the existing wood in profile and should be stained or primed and painted to match the existing.
- Loose and displaced wood elements should be repaired and reattached where possible or replaced with matching wood siding.
- At locations where loss of paint is observed, the wood should be scraped to remove loose material, and the substrate primed and painted

to match the original color scheme, using alkyd-based paints formulated for the particular substrate.

- Deteriorated glazing putty at wood windows should be removed and the sash reglazed using an oil-based glazing putty.
- Damaged wood storm doors should be repaired as needed. If a new storm door is required, install new wood storm doors to match existing.
- Deteriorated wood gutter elements should be replaced with new wood to match existing in size. Consideration should be given to installing a liner at the interior of the gutter.
- Cracked and deteriorated stucco should be repaired with compatible materials. New stucco at repair areas should match the existing cementitious stucco in color, texture and finish, and composition. Consideration could be given to recoating the entire stuccoed area with an opaque, silicate-based coating following completion of any repairs to achieve a consistent appearance.
- Biological growth and mildew at the wood elements at the front porch should be removed by cleaning with a biocide.
- The condition of the roof should be reviewed regularly, and any loose roof shingles should be removed, as they may pose a safety hazard. If possible, reinstall the existing shingle or provide other roof close to prevent water infiltration at the interior of the building.
- Cracked, loose, and displaced concrete roof shingles should be replaced with new shingles to match the appearance of the original concrete shingles. New shingles should be custom fabricated to match the appearance of the original shingles in terms of size, configuration, color, and texture, but may be fabricated in a different material to provide better durability.

Building A Interior

- Future interior alterations and changes should not contribute to the loss of the remaining character-defining features and materials listed in the Significance and Integrity chapter of this HSR. Where possible, existing tile in bathrooms, and wood wainscot and wood trim in guestrooms should be retained.
- Stained, loose, cracked, and blistered paint should be removed, sanded as needed to prepare the surface, and primed and repainted.
- While alterations may be needed to allow for accessible overnight accommodations in the future, the character-defining floor-plan configurations of the guestrooms should be retained where possible.
- Organic growth on sound but water-stained plaster walls and ceilings should be treated with a biocide before applying a stain-hiding, alkaline-resistant primer and finish coats of compatible acrylic latex paint.

Building B Exterior

- Deteriorated, split, and otherwise damaged wood siding should be removed and replaced with matching wood siding.
- Decay at wood siding, trim, window and door frames, and decorative elements should be removed and new wood dutchman or replacement units installed. The dutchman or replacement units should match the existing wood in profile and should be stained or primed and painted to match the existing.
- Loose and displaced wood elements should be repaired and reattached where possible or replaced with matching wood siding.
- At locations where loss of paint is observed, the wood should be scraped to remove loose material, and the substrate primed and painted to match the original color scheme, using alkyd-based paints formulated for the particular substrate.
- Deteriorated glazing putty at wood windows should be removed and the sash reglazed using an oil-based glazing putty.
- Damaged wood storm doors should be repaired as needed. If a new storm door is

required, install new wood storm doors to match existing.

- Deteriorated wood gutter elements should be replaced with new wood to match existing in size. Consideration should be given to installing a liner at the interior of the gutter.
- Cracked and deteriorated stucco should be repaired with compatible materials. New stucco at repair areas should match the existing cementitious stucco in color, texture and finish, and composition. Consideration could be given to recoating the entire stuccoed area with an opaque, silicate-based coating following completion of any repairs to achieve a consistent appearance.
- Biological growth at the wood elements at the front porch should be treated with a biocide.
- The condition of the roof should be reviewed regularly, and any loose roof shingles should be removed, as they may pose a safety hazard. If possible, reinstall the existing shingle or provide other roof close to prevent water infiltration at the interior of the building.
- Cracked, loose, and displaced concrete roof shingles should be replaced with new shingles to match the appearance of the original concrete shingles. New shingles should be custom fabricated to match the appearance of the original shingles in terms of size, configuration, color, and texture, but they may be fabricated in a different material to provide better durability.

Building B Interior

- Future interior alterations and changes should not contribute to the loss of the remaining character-defining features and materials listed in the Significance and Integrity chapter of this HSR. Where possible, existing tile in bathrooms, and wood wainscot and wood trim in guestrooms should be retained.
- Stained, loose, cracked, and blistered paint should be removed, sanded as needed to prepare the surface, and primed, and repainted.
- While alterations may be needed to allow for accessible overnight accommodations in the future, the character-defining floor-plan configurations of the guestrooms should be retained where possible.
- Stained, loose, cracked, and blistered paint should be removed, sanded as needed to prepare the surface, and primed and repainted.
- Organic growth on sound but water-stained plaster walls and ceilings should be treated with a biocide before applying a stain-hiding, alkaline-resistant primer and finish coats of compatible acrylic latex paint.

Bluffs Lodge Water Tank

- Organic growth should be cleaned from the water tank using a biocide. Cleaning mock-ups should be performed to evaluate cleaning systems to be used overall and to determine concrete appearance for matching of concrete repair materials.
- Surface corrosion should be removed from the water tank, followed by priming and painting as needed.
- Prime and paint areas where non-historic graffiti is present at the water tank. Consideration could be given to recoating the entire water tank at one time.

Bluffs Lodge Pump House

- The existing metal door and frame should be removed and replaced with a new door and frame to match the appearance of existing door assembly.
- Clean concrete masonry units with a biocide/detergent at affected areas to remove organic growth. Cleaning mock-ups should be performed to evaluate cleaning systems to be used overall and to determine concrete appearance for matching of concrete repair materials.

Recommendations for Further Research

1. Conduct further archival research to identify additional information, if available, regarding the history of the water tank, pump house, and water-system infrastructure at Bluffs Lodge. This information will further inform understanding of the history, evolution, and significance of the water system at the site.

Resilience to Natural Hazards

Increasingly frequent strong storms and heavy rainfall (and snowstorms) have been noted for several years in the southeastern United States, while drought presents another significant threat to the region. Although threats are more immediate to coastal historic sites, non-coastal historic sites similarly require identification of the resources anticipated to be threatened—both structures and landscapes—and planning for protection as well as mitigation in the face of increased storms.

As loss of historic resource integrity may occur, suddenly or slowly, from conditions related to natural hazards, documentation is the first response to mitigate anticipated loss or diminishment, or to plan for the impacts associated with natural hazards. This Historic Structures Report, including the historical narrative, condition assessment, and recommendations, together with photographs and measured drawings, is an important part of the documentation process.

As part of future efforts to build on and update the documentation provided in this Historic Structures Report, the National Park Service can consider such approaches with more detailed documentation resulting from new three-dimensional scanning technology, monitoring weather-related deterioration, updating emergency and disaster planning to address resiliency to natural hazards, and strategic planning for mitigation of the effects of natural hazards on park resources. The latter may include special protection, documentation, and interpretation measures to address resources that are especially vulnerable to damage or loss due to climate change-related conditions.

In addition to threats to the historic resources, natural hazards affect visitation patterns. Visitation to the Blue Ridge Parkway is consistently high, with an estimated 15.9 million recreation visits to the park in 2021.[104] Road closures occur along the parkway due to winter snows and occasional washouts or road failures due to heavy rains. For example, a storm in spring 2020 resulted in a full road failure 150 feet in length at Milepost 1227.8, near Roanoke, Virginia, necessitating extensive repairs.[105] The park provides information to alert visitors to road closures, as well as closure of trails. These closures are anticipated to occur more frequently with increasing incidences of severe weather.

Efforts conducted for Bluffs Lodge and the entire Blue Ridge Parkway will benefit from coordination with other planning and documentation projects to address effects of climate change under consideration or in the process of being implemented by the National Park Service in Interior Region 2. Future severe weather events and other impacts related to natural hazards should be anticipated and considered in planning for protection and maintenance of the Bluffs Lodge site and its resources, in coordination with consideration of climate change and natural hazards throughout the Blue Ridge Parkway.

104. National Park Service, Blue Ridge Parkway, "Parkway visitation tops 15 million in 2021," accessed October 2022, https://www.nps.gov/blri/learn/news/parkway-2021-visitation.htm.
105. National Park Service, Blue Ridge Parkway, "Blue Ridge Parkway Closure near Roanoke, Virginia, Extended," accessed October 2022, https://www.nps.gov/blri/learn/news/roanokeslideupdate22.htm. The closure, which necessitated a detour off the parkway from Milepost 121.4 to Milepost 136, was extended until spring 2023 due to discovery of a failed culvert, which required further repairs.

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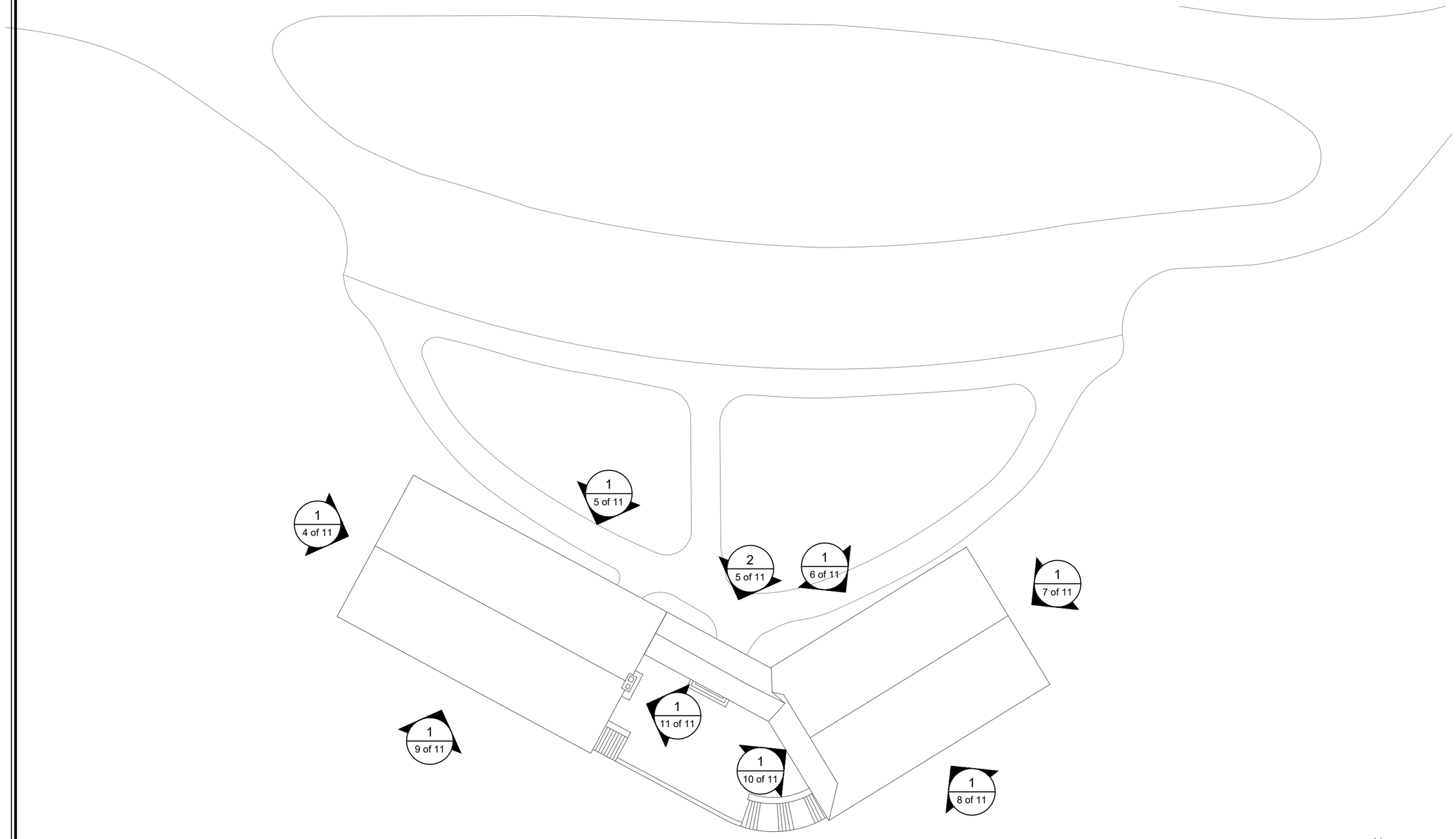
Appendix A: Measured Drawings



1 SITE PLAN
1/32" = 1'-0"

N

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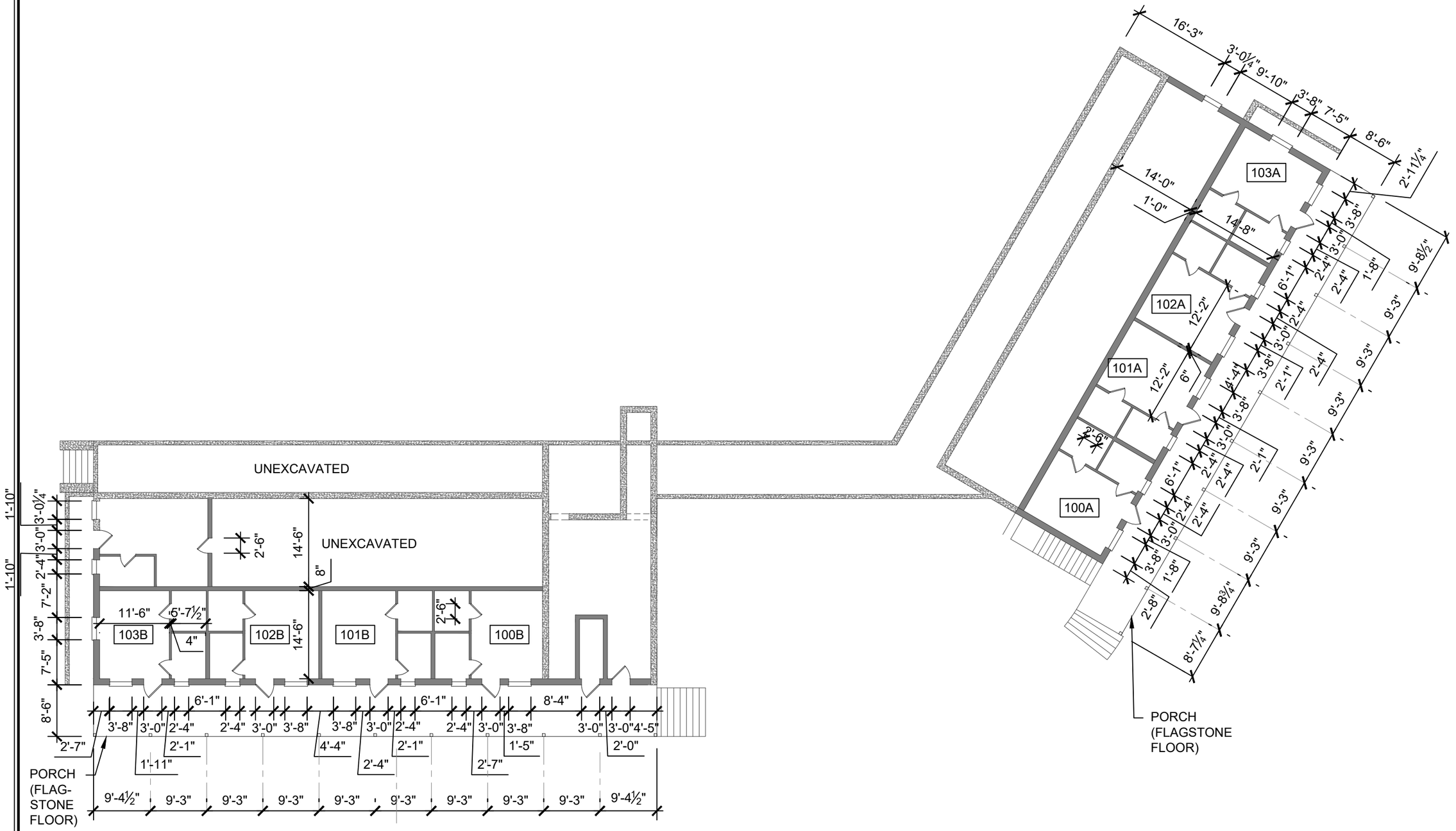
NATIONAL PARK SERVICE
U.S. DEPARTMENT OF THE INTERIOR
SOUTHEAST REGIONAL OFFICE

BLUFFS LODGE
BLUE RIDGE PARKWAY LAUREL SPRINGS, NORTH CAROLINA

HISTORIC STRUCTURE REPORT

SHEET
1 OF 11



1 GROUND FLOOR PLAN
1/16" = 1'-0"

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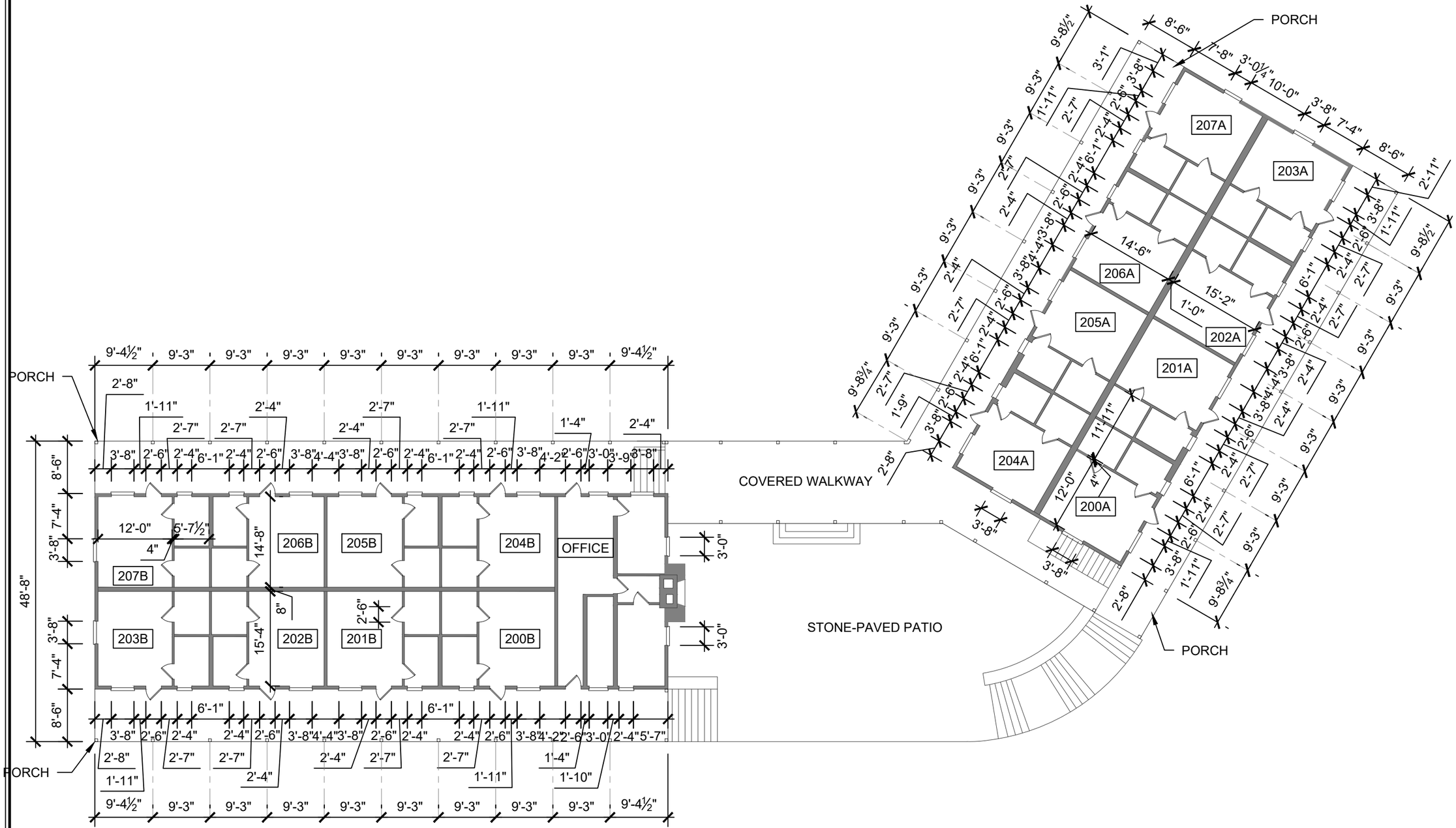
BLUFFS LODGE
BLUE RIDGE PARKWAY LAUREL SPRINGS, NORTH CAROLINA

HISTORIC STRUCTURE REPORT

SHEET 2 OF 11



1 FIRST FLOOR PLAN
1/16" = 1'-0"

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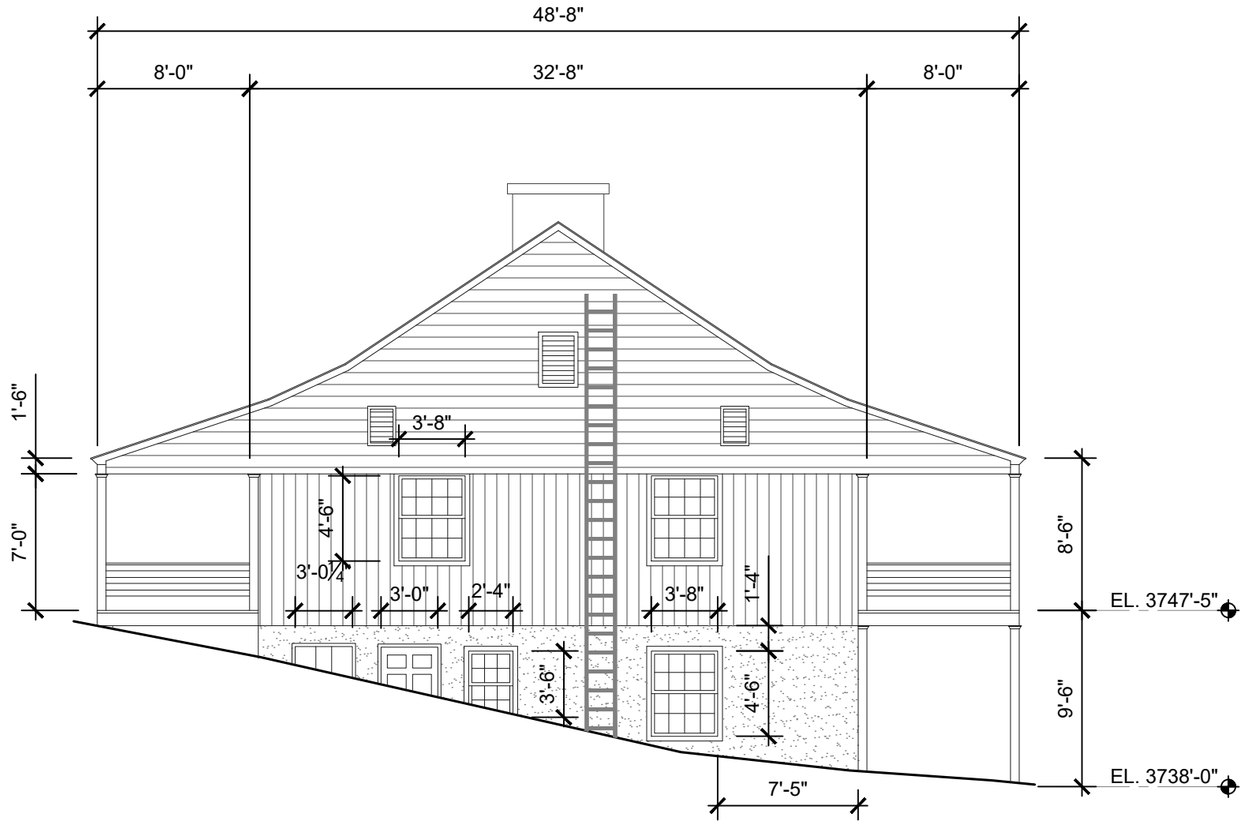
BLUFFS LODGE
BLUE RIDGE PARKWAY LAUREL SPRINGS, NORTH CAROLINA

HISTORIC STRUCTURE REPORT

SHEET 3 OF 11



1 BUILDING B - NORTHWEST ELEVATION

SCALE: 1/8" = 1'-0"

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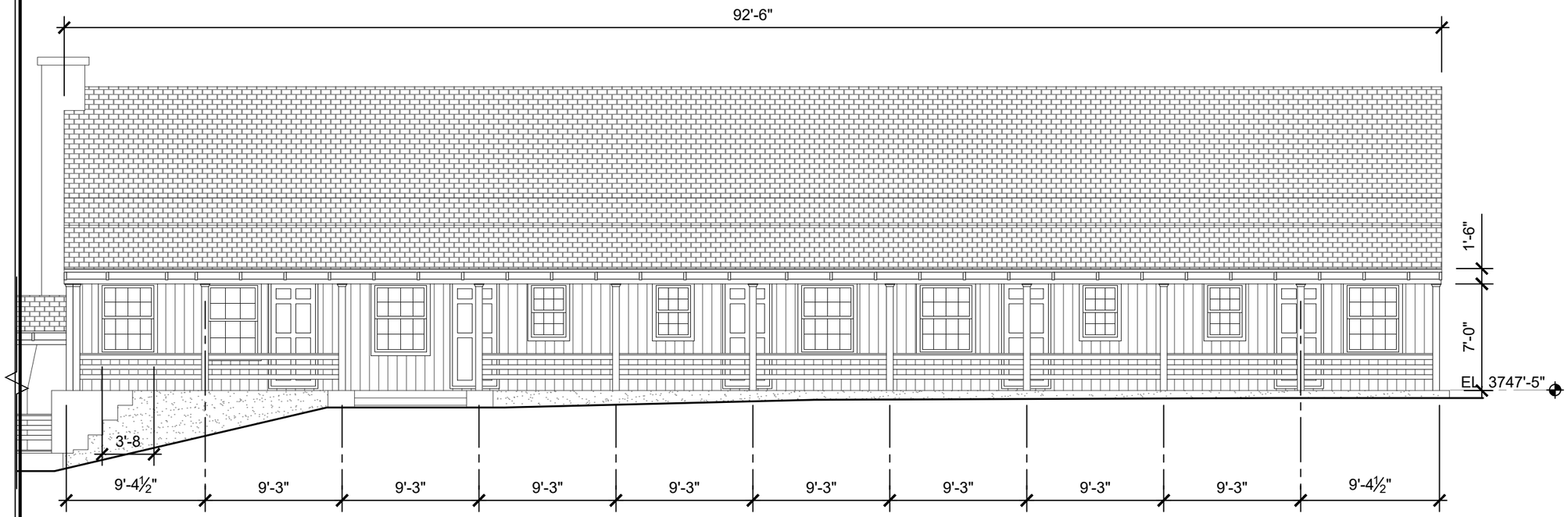
BLUFFS LODGE
BLUE RIDGE PARKWAY LAUREL SPRINGS, NORTH CAROLINA

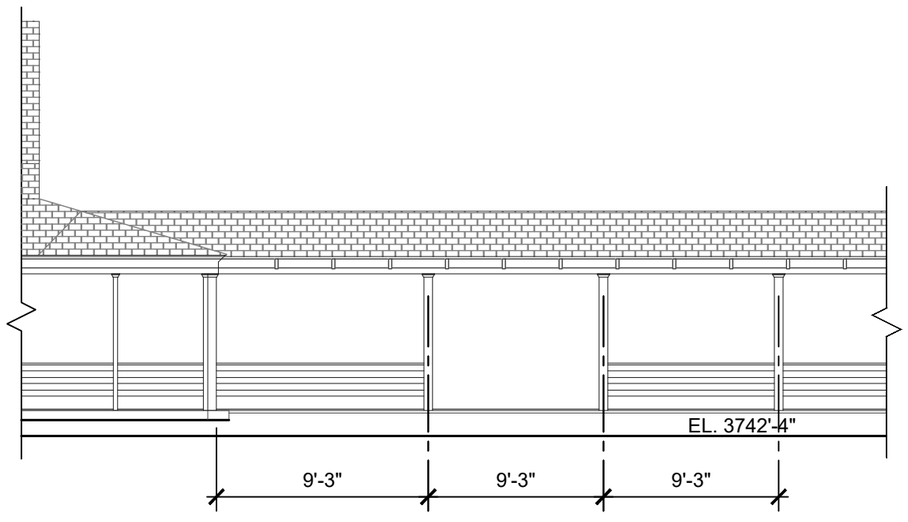
HISTORIC STRUCTURE REPORT

SHEET 4 OF 11



1 BUILDING B - NORTHEAST ELEVATION

SCALE: 1/8" = 1'-0"



2 COVERED WALKWAY - NORTHEAST ELEVATION

SCALE: 1/8" = 1'-0"

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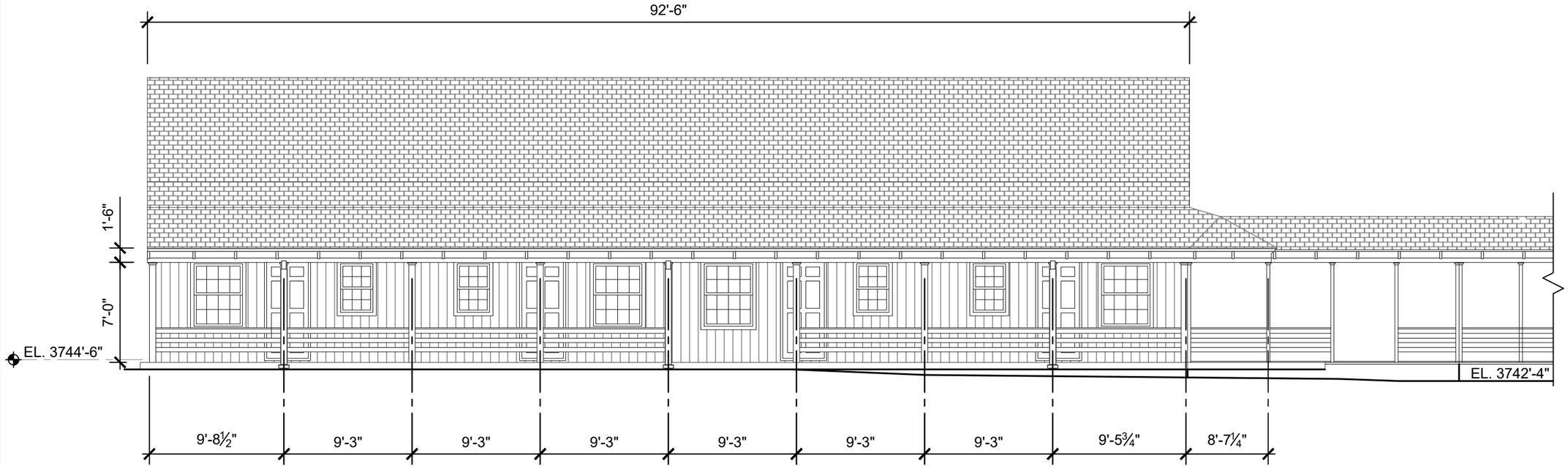
BLUFFS LODGE
BLUE RIDGE PARKWAY LAUREL SPRINGS, NORTH CAROLINA

HISTORIC STRUCTURE REPORT

SHEET 5 OF 11



1 BUILDING A - NORTH ELEVATION

SCALE: 1/8" = 1'-0"

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BLUE RIDGE PARKWAY LAUREL SPRINGS, NORTH CAROLINA

HISTORIC STRUCTURE REPORT

SHEET
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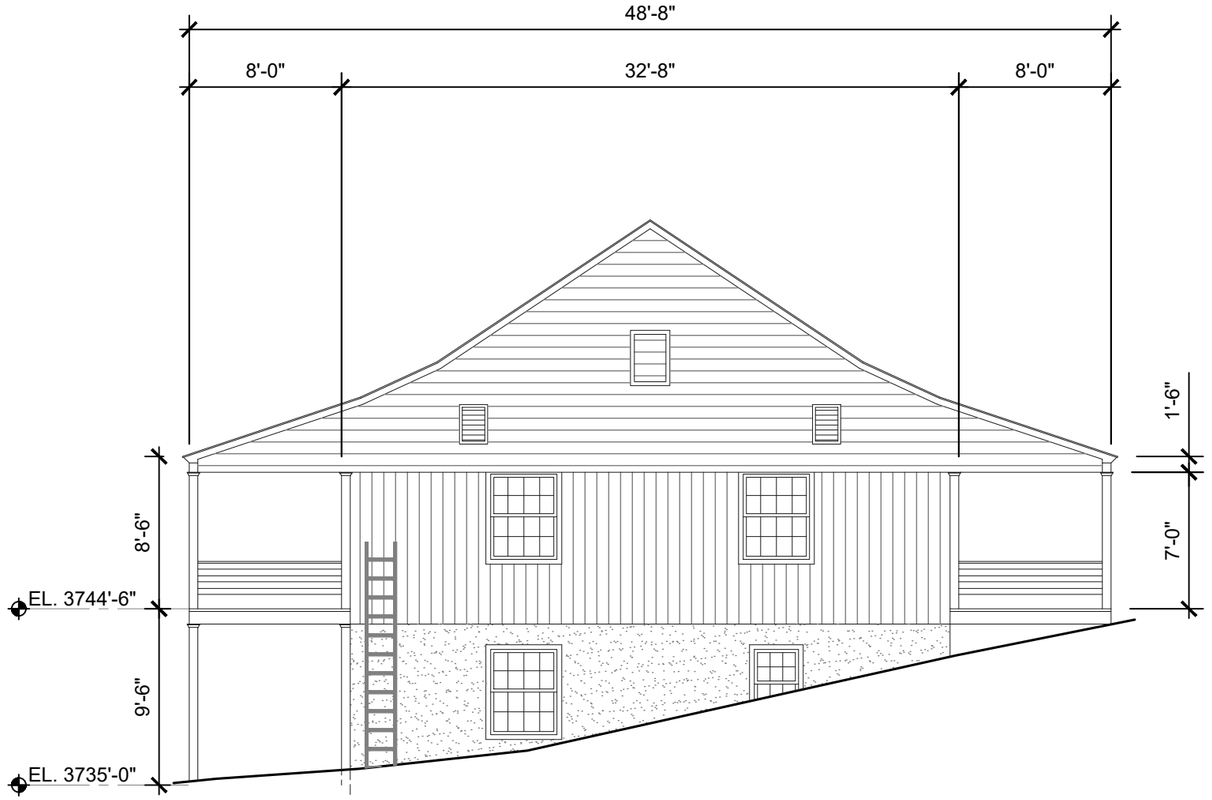

1 BUILDING A - EAST ELEVATION

SCALE: 1/8" = 1'-0"

SHEET 7 OF 11

HISTORIC STRUCTURE REPORT

BLUFFS LODGE

BLUE RIDGE PARKWAY LAUREL SPRINGS, NORTH CAROLINA

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1 BUILDING A - SOUTH ELEVATION

SCALE: 1/8" = 1'-0"

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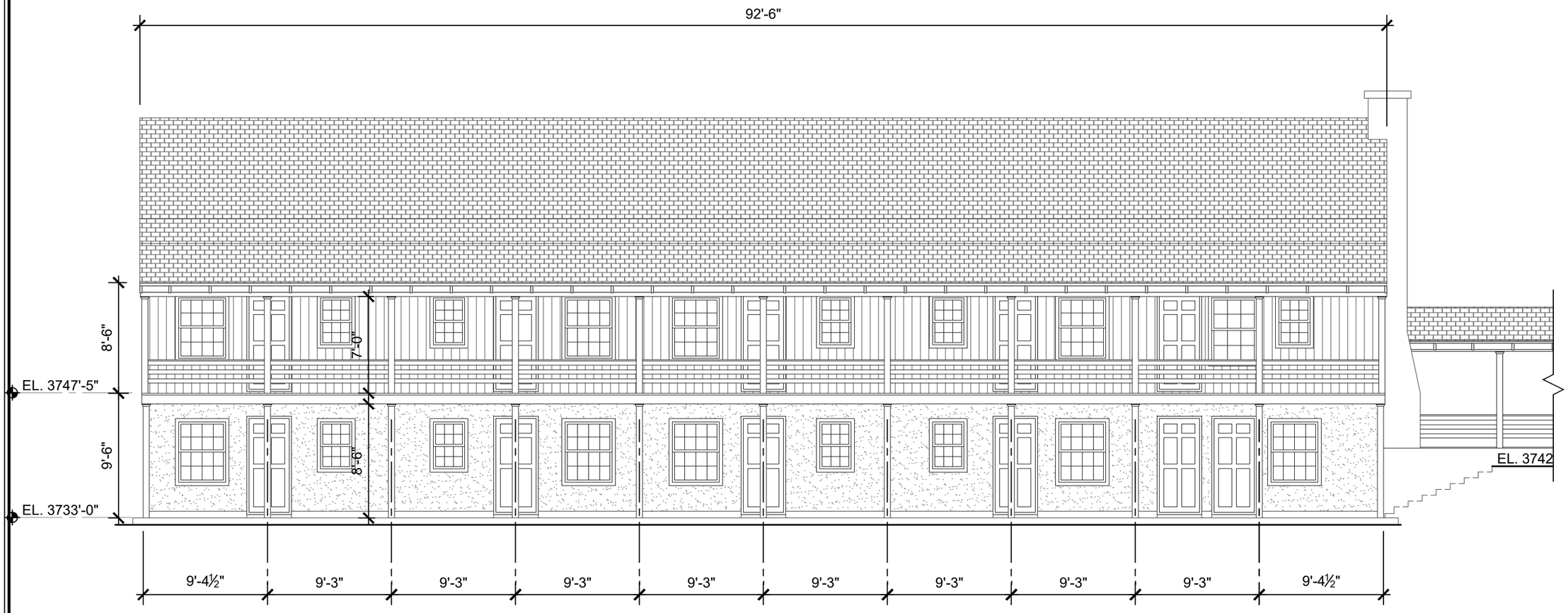
BLUFFS LODGE
BLUE RIDGE PARKWAY LAUREL SPRINGS, NORTH CAROLINA

HISTORIC STRUCTURE REPORT

SHEET 8 OF 11



1 BUILDING B - SOUTHWEST ELEVATION

SCALE: 1/8" = 1'-0"

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BLUFFS LODGE
BLUE RIDGE PARKWAY LAUREL SPRINGS, NORTH CAROLINA

HISTORIC STRUCTURE REPORT

SHEET 9 OF 11

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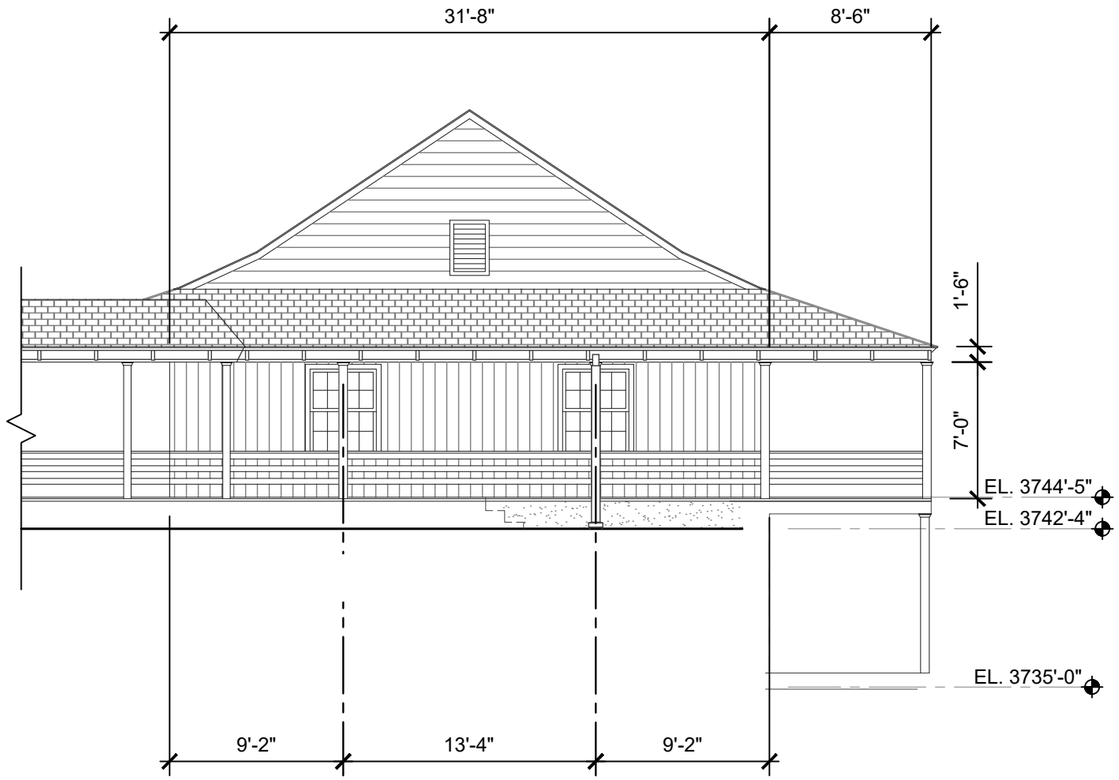

1 BUILDING A - WEST ELEVATION

SCALE: 1/8" = 1'-0"

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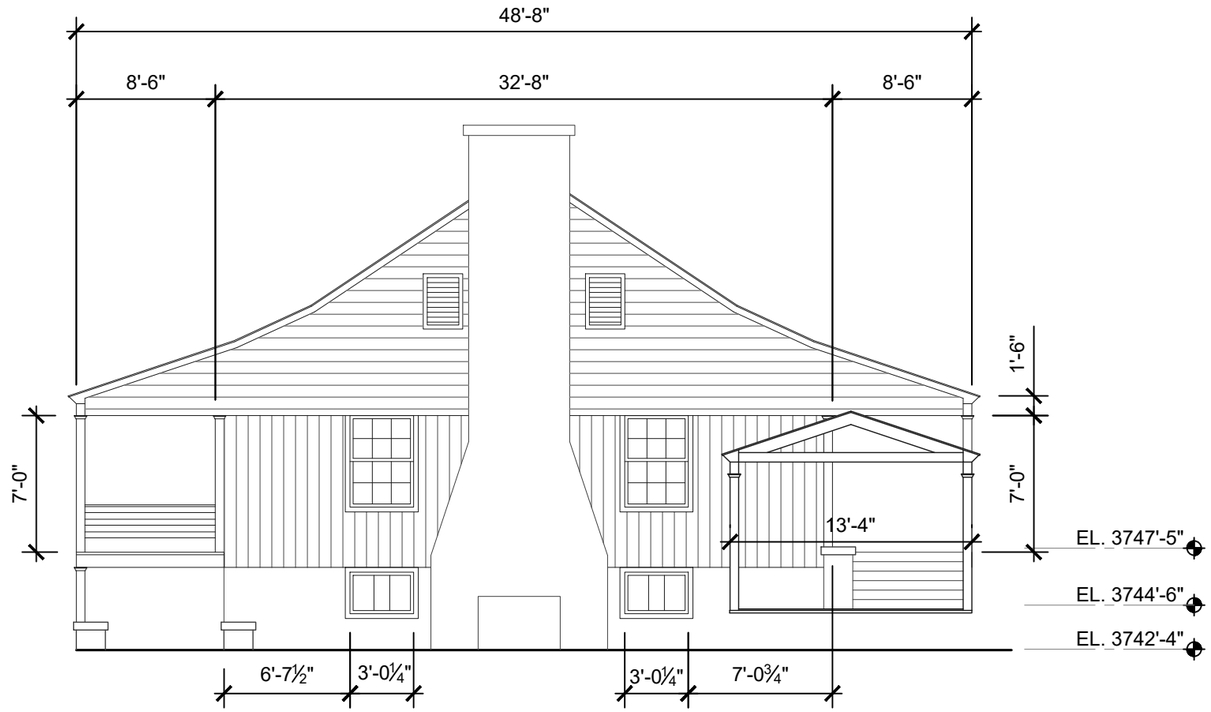
BLUFFS LODGE
BLUE RIDGE PARKWAY LAUREL SPRINGS, NORTH CAROLINA

HISTORIC STRUCTURE REPORT

SHEET
10 OF 11



1 BUILDING B - SOUTHEAST ELEVATION

SCALE: 1/8" = 1'-0"

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BLUFFS LODGE
BLUE RIDGE PARKWAY LAUREL SPRINGS, NORTH CAROLINA

HISTORIC STRUCTURE REPORT

SHEET
11 OF 11

Appendix B: Assessment of Hazardous Materials

A REPORT FOR A QUALITATIVE SURVEY

FOR

SUSPECT ASBESTOS-CONTAINING MATERIALS,

LEAD-CONTAINING MATERIALS

AND

HAZARDOUS MATERIALS AND UNIVERSAL WASTE AND OTHER ENVIRONMENTAL CONDITIONS

OF

BLUFFS LODGE A and B
DOUGHTON PARK, BLUERIDGE PARKWAY
LAUREL SPRINGS, NORTH CAROLINA

IDIQ Contract No.: P16PC00097, Task Order 40P5121F0034

Requested by

Commonwealth Heritage Group
2390 Clinton, Boulevard
Buffalo, New York 14227

Telephone No. 716-831-1650

Prepared by

Southern Environmental Management and Specialties, Inc.
160 Upton Drive
Jackson, Mississippi 39209

Report No. 22.1542-0001
March 2022

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Asbestos-Containing Materials

1.0 PURPOSE AND SCOPE OF SERVICES

Southern Environmental Management and Specialties, Inc. (SEMS) was retained by Commonwealth Heritage Group Inc. to conduct a facility Qualitative Survey to identify suspected Asbestos-Containing Materials (ACM) at Bluffs Lodge Unit A and B, in Doughton Park, Blue Ridge Parkway, Laurel Springs, North Carolina for the National Park Service, Region 2, South Atlantic Gulf.

Specifically, the scope of services rendered included the following:

Scope of Work:

1. Conduct a visual survey of the building interior spaces and exterior to identify suspect asbestos-containing building materials.

2. Prepare a final report with observations and recommendations relating to the identified facilities' conditions.

2.0 SITE DESCRIPTION

SEMS, under the direction of Commonwealth Heritage Group Inc., conducted a site investigation on November 16, 2021, to identify suspected Asbestos-Containing Materials (ACM) at Bluffs Lodge Unit A and B, in Doughton Park, Blue Ridge Parkway, Laurel Springs, North Carolina. The units were constructed and opened in 1949. Each building is one (1) story with a walkout basement first floor set into the hillside. The walkout basement is half the area of the top floor. The walkout basement is on a concrete foundation and the interior has plaster walls and ceilings and carpeted floors in the living area and ceramic tiles in the bathrooms. The second floor is wooden framed with plaster walls and ceilings and carpeted floors in the living area and ceramic tiles in the bathrooms. The exterior of the first floor is poured concrete and the second floor is rough-cut wood planking and the pitched roof has cement tile shingles.

3.0 DISCUSSION OF OBSERVATIONS

SEMS only identified building materials that were suspect to be asbestos-containing materials (ACM). No sampling or laboratory analysis was conducted on these suspect materials. Any suspect building materials that were newly installed without documentation of being asbestos free or have no listed asbestos in the material safety data sheet (MSDS), safety data sheet (SDS) or manufacturer's data will be considered *Presumed Asbestos Containing Materials (PACM*) *if it is asphalt or vinyl flooring material or thermal system insulation or surfacing materials installed up to 1980 or Assumed during any installation time period* until laboratory analysis confirms if asbestos is present or absent.

This is a public access building subject to compliance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61 Subpart M.

SEMS was not provided with any previous asbestos-containing materials inspection records concerning the presence, installation, management, or removal/abatement for the buildings on the property.

The following summary of findings is based on the results from the physical observation during the field investigation:

1. **SEMS** presents the following table, summarizing the results of the asbestos-containing materials (ACM) visual survey.

Material	Location	Comment
Plaster wall and ceiling systems	Throughout the facility	Distributed water damage was observed particularly in the walkout basement area.
Substrate Materials Beneath Carpeting	Throughout the facility	No investigative destructive sampling was conducted to determine a substrate beneath the installed carpeting.

Material	Location	Comment
Piping Thermal System Insulation	Boiler room and distribution piping	None
Drywall, mud, and taped seams	Spot interior locations and Attic storage area	None
Roll and Batt Wall and Ceiling insulation	Throughout facility	Mainly observed in the attic
Window glaze puddy	Throughout facility	Mainly exterior windows
Masonry Mortar	Exterior stonework	None
Roofing Tiles	Exterior	None

Inspection Report Limitations

This report shall not be used as a substitute for National Emission Standard for a Hazardous Air Pollutant (NESHAP) thorough inspection prior to renovation or demolition activities (40 CFR Part 61 Subpart M).

According to the Environmental Protection Agency (EPA) any material containing greater than one percent (>1%) asbestos is considered ACM.

4.0 SUMMARY OF RECOMMENDATIONS

Summary of Recommendations

The following recommendations are made concerning the suspect building materials located at Bluffs Lodge Unit A and B, in Doughton Park, Blue Ridge Parkway, Laurel Springs, North Carolina.

1. **SEMS** recommends that prior to demolition or renovation of any of the listed suspect building materials that will be disturbed by these activities that a "thorough inspection" as referenced in USEPA 40 CFR 60 Subpart M Nation Emission Standard for Asbestos and North Carolina General Statute Subsection 130A-444 through Subsection 130A-45. The inspector must be accredited through the North Carolina Health Hazards Control Unit. The inspector should sample the suspect materials and have them analyzed at an accredited National Institute of Standards and Technology (NIST) National Voluntary Laboratory Accreditation Program (NVLAP) laboratory to determine the absence or presence of asbestos in the building materials.

2. **SEMS** makes no further recommendations at this time regarding the study site; however, **SEMS** reserves the right to modify our opinion should additional information, not available during the time of this investigation, be presented to **SEMS**.

Lead-Containing Materials

1.0 PURPOSE AND SCOPE OF SERVICES

SEMS was retained by Commonwealth Heritage Group Inc. to conduct a facility survey to identify suspect lead-based paint and lead-containing materials at Bluffs Lodge Unit A and B, in Doughton Park, Blue Ridge Parkway, Laurel Springs, North Carolina for the National Park Service, Region 2 South Atlantic Gulf.

Specifically, the scope of services rendered included the following:

Scope of Work:

1. Conduct a visual survey of the building interior spaces and exterior for suspect lead-based paint and lead-containing materials.

2. Prepare a final report with observations and recommendations relating to the facility conditions identified.

2.0 DISCUSSION OF OBSERVATIONS

SEMS presents the following table, summarizing the results of the lead-based paint visual survey:

Component	Location	Comment
Interior Painted surfaces, all components	Throughout the facility	Some paint is in poor condition and pealing from the substrate
Interior glazed ceramic tiles	Bathrooms throughout the facility	These items would be considered Lead-containing materials and not lead-based paint items
Exterior wooden siding planks	Throughout the facility	Surface in weather condition
Exterior wooden columns and railings	Throughout the facility	Surfaces in weather condition

Component	Location	Comment
Exterior wooden eaves, facias, soffits, and overhangs	Throughout the facility	Surfaces in weather condition
Window Systems, interior and exterior sides	Throughout the facility	Some paint is in poor condition and pealing from the substrate
Exterior Doors: Main and Slat-Screen	Throughout the facility	Some paint is in poor condition and pealing from the substrate
Piping	Boiler Room	None
Pump House Siding	Pump House separate for main buildings	None

The State of North Carolina has set one (1.0) milligram per square centimeter (mg/cm2) by X-ray Fluorescence (XRF) analysis as the definition of Lead–Based Paint. The Occupational Safety and Health Administration (OSHA) regulates Lead in Construction by 29 CRF 1926.62 for any detectable lead and is dependent on the task impacting surfaces that have lead.

3.0 SUMMARY OF RECOMMENDATIONS

The following recommendations are made concerning the painted building materials at Bluffs Lodge Unit A and B, in Doughton Park, Blue Ridge Parkway, Laurel Springs, North Carolina.

1. **SEMS** recommends that a lead-based paint inspection of the exterior and interior of the buildings be conducted by an inspector or risk assessor certified by the State of North Carolina Department of Health and Human Services, Health Hazard Control Unit.

2. **SEMS** makes no further recommendations at this time regarding the study site; however, **SEMS** reserves the right to modify our opinion should additional information, not available during the time of this investigation, be presented to **SEMS**.

Hazardous Materials and Universal Waste and Other Environmental Conditions

1.0 INTRODUCTION

SEMS was retained by Commonwealth Heritage Group Inc. to conduct a Qualitative Survey for potential hazardous waste and universal waste and environmental conditions identified at Bluffs Lodge Unit A and B, in Doughton Park, Blue Ridge Parkway, Laurel Springs, North Carolina for the National Park Service, Region 2, South Atlantic Gulf.

This report section presents the Findings and Recommendations of the Qualitative Assessment for Hazardous Materials and Universal Waste and Environmental Conditions.

Background:

As background information and an introduction into the qualitative survey proposed for the subject facility, the following sections describe **Hazardous Materials and the Universal Waste Rule (UWR) and the relationship with hazardous waste typically handled by the Resource Conservation and Recovery Act (RCRA).**

1.1 Hazardous Materials

Hazardous materials pose hazards and risks to humans, animals, and the environment and can be any substance or material that could adversely affect the safety of the public, handlers or carriers. Hazardous material professionals are responsible for and properly qualified to manage such materials at any point in their life-cycle, from process planning and development of new products; through manufacture, distribution and use; and to disposal, cleanup and remediation. Hazardous materials are defined and regulated in the United States primarily by laws and regulations administered by the U.S. Environmental Protection Agency (EPA), the U.S. Occupational Safety and Health Administration (OSHA), the U.S. Department of Transportation (DOT), and the U.S. Nuclear Regulatory Commission (NRC). Each has its own definition of a "hazardous material."

OSHA's definition includes any substance or chemical which is a "health hazard" or "physical hazard," including: chemicals which are carcinogens, toxic agents, irritants, corrosives, sensitizers; agents which act on the hematopoietic system; agents which damage the lungs, skin, eyes, or mucous membranes; chemicals which are combustible, explosive, flammable, oxidizers, pyrophorics, unstable-reactive or water-

reactive; and chemicals which in the course of normal handling, use, or storage may produce or release dusts, gases, fumes, vapors, mists or smoke which may have any of the previously mentioned characteristics. (Full definitions can be found at 29 Code of Federal Regulations (CFR) 1910.1200.)

1.2 Universal Waste

The Universal Waste Rule (UWR) codified in Title 40 Code of Federal Regulations (CFR) Part 273, "Standards for Universal Waste Management," was promulgated by the Environmental Protection Agency (EPA) on 11 May 1995. The EPA developed the UWR to improve waste management practices of widely generated, low risk Resource Conservation and Recovery Act (RCRA) hazardous waste. Through streamlined RCRA waste management practices, the EPA intended to develop a system to separate "universal" hazardous waste from the municipal waste stream and ensure proper waste management.

The streamlined management established by the UWR provides relief from the full regulatory aspects of RCRA by simplifying collection and management requirements for universal waste. **In 1995, the EPA designated three (3) types of hazardous waste as universal: batteries, pesticides, and thermostats. In 1999, the EPA added lamps to the list of universal waste and in 2005 EPA added Mercury-containing equipment which means a device or part of a device (including thermostats but excluding batteries and lamps) that contains elemental mercury integral to its function.**

Although the UWR is less stringent than RCRA, EPA believes the rule encourages resource conservation and improves the implementation of RCRA. EPA developed the rule to facilitate and expand collection of universal waste, and hopes the rule will encourage unregulated entities to participate, further diverting these wastes from the municipal solid waste stream.

The following is the current list and definition of Universal Waste:

a. Batteries

A battery is defined in Title 40 CFR 273.9, "Definitions," as a device designed to receive, store, and deliver electric energy that consists of one or more electrically connected electrochemical cells. The term also includes an intact, unbroken battery from which the electrolyte has been removed. In short, many kinds/types of batteries are covered under the universal waste regulations as long as they are hazardous waste. Spent lead-acid batteries, which are managed under Title 40 CFR Part 266, Subpart G, "Spent Lead-Acid Batteries Being Reclaimed," are exempt from universal waste

regulations. However, if spent lead-acid batteries are not managed under Title 40 CFR Part 266, Subpart G, then they are subject to management under universal waste regulations.

b. Lamps

A lamp is defined as "the bulb or tube portion of an electric lighting device." Examples of common universal waste lamps include spent fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps. As of 6 January 2000, any spent or waste lamp that is hazardous or exhibits one of the hazardous waste characteristics identified in Title 40 CFR Part 261, "Identification and Listing of Hazardous Wastes," is subject to regulation as a universal waste.

c. Pesticides

A pesticide means "any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, or intended for use as a plant regulator, defoliant, or desiccant, other than animal drugs and feeds. Therefore, any unused pesticide products that are collected and managed as part of a waste pesticide collection/recall program mandated by the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), or a voluntary recall program, are subject to management under universal waste regulations. [Note: Recalled pesticides managed by farmers in compliance with Title 40 CFR Part 262, "Standards Applicable to Generators of Hazardous Wastes," Subpart G, "Farmers," are not subject to regulation as a universal waste.]

d. Mercury-Containing Equipment

Mercury-containing equipment means a device or part of a device (including thermostats but excluding batteries and lamps) that contains elemental mercury integral to its function. A thermostat means "a temperature control device that contains metallic mercury in an ampule attached to a bimetal sensing element, and mercury-containing ampules that have been removed from these temperature control devices." A thermostat becomes a solid waste on the date it is discarded, at which time the generator must determine if the thermostat exhibits any hazardous waste characteristic: ignitability, corrosivity, reactivity, or toxicity. If thermostats are not waste, or are not determined to be hazardous wastes, they are not subject to universal waste regulations.

2.0 PURPOSE AND SCOPE OF SERVICES

SEMS proposed to conduct a Qualitative Assessment for potential hazardous waste, universal waste and environmental conditions located at Bluffs Lodge Unit A and B, in Doughton Park, Blue Ridge Parkway, Laurel Springs, North Carolina for the National Park Service, Region 2 South Atlantic Gulf.

Specifically, the scope of services rendered for this project included the following:

Scope of Work:

1. Conduct a Qualitative Assessment to identify potential hazardous waste and universal waste and environmental conditions that may impact planned renovation and/or demolition activities.

2. Review all field, survey, and analytical data (if available) to provide a comprehensive facility assessment.

3. Prepare a final report with observations and recommendations relating to the qualitative assessment.

3.0 DISCUSSION OF FINDINGS

SEMS conducted a facility-wide Qualitative Survey to identify potential **Hazardous Materials, Universal Waste and Environmental Conditions** that may have an impact on planned renovation and/or demolition activities. The Findings are discussed below:

3.1 Hazardous Materials

SEMS conducted a limited survey to identify hazardous materials or areas with environmental concerns. The following materials and concerns were identified:

1. **SEMS** determined by site interview and reconnaissance that the site potentially had an underground storge tank (UST) on site for fueling the facility boiler. A review of tank closure records obtained from the North Carolina Department of Environmental Quality could not substantially verify closure and no further action that was site specific. No other records were provided by the National Park Service concerning a UST removal, or closure. The tank pit appeared to be in front of the Building B top floor administration office. Additional research indicates that this UST potentially was for heating oil which is considered non-regulated. However, if a leak or spill had occurred, sampling and clean-up regulations may apply (15 A NCAN 02L.0404 (b)

2. **SEMS** did observe areas of chemical/hazardous materials storage in the form of small quantity bulk containers in the Building B walkout basement

boiler-room. These mainly consisted of maintenance chemicals, paint, and cleaning products.

3.2 Universal Waste

1. **SEMS** did not observe any batteries that would be subject to universal waste regulations as defined in Title 40 CFR 273.9.

2. **SEMS** did observe fluorescent lamps as defined as a universal waste.

3. **SEMS** did not observe any pesticides that would be subject to universal waste regulations as defined in Title 40 CFR 273.9.

4. **SEMS** did not observe any zone control thermostats that would be subject to universal waste regulations as defined in Title 40 CFR 273.9.

4.0 SUMMARY OF RECOMMENDATIONS

Summary of Recommendations:

The following recommendations are made concerning universal waste and environmental conditions identified at Bluffs Lodge Unit A and B, in Doughton Park, Blue Ridge Parkway, Laurel Springs, North Carolina for the National Park Service, Region 2 South Atlantic Gulf.

1. **SEMS** recommends that soil samples should be collected in the area that appears to be the former tank pit to verify that no spills or leaks had occurred prior to or during removal of the UST.

2. **SEMS** recommends that the accumulated chemical and hazardous materials and fluorescent lamps and ballast be disposed in compliance with North Carolina Department of Environmental Quality universal waste management standard 15 NCAC 13A.0119

Microbial Contamination

1.0 PURPOSE AND SCOPE OF SERVICES

Southern Environmental Management and Specialties, Inc. (SEMS) was retained by Commonwealth Heritage Group Inc. to conduct an Indoor Environmental Quality assessment of Bluffs Lodge Unit A and B, in Doughton Park, Blue Ridge Parkway, Laurel Springs, North Carolina for the National Park Service, Region 2 South Atlantic Gulf. The intent of the assessment was to visually evaluate the property for suspect biological contamination in the form of mold or mold-like substances as a result of suspect water intrusion and extended lack of maintenance and housekeeping.

Specifically, the scope of services rendered included the following:

Scope of Work:

1. Conduct a visual survey of the building interior to identify property for suspect biological contamination in the form of mold or mold-like substances.

2. No testing or sampling (Destructive or Non-destructive) was performed.

3. Prepare a final report with observations and recommendations relating to the identified facilities' conditions.

2.0 DISCUSSION OF OBSERVATIONS

The building has been vacant without climate control for an estimated 11 years. During that time period no environmental climate controls were available, and in addition, leaks of unknown origin occurred and water had penetrated into the interior of the building. These conditions have led to significant microbial contamination of building material surfaces mainly in the walkout basement areas of both buildings and the Administration Office on the second floor of Building B. Microbial growth was observed in the top floor rooms of both buildings but was limited to furnishings such as chairs and dressers instead of building surfaces.

3.0 SUMMARY OF RECOMMENDATIONS

The following recommendations are made concerning the painted building materials at Bluffs Lodge Unit A and B, in Doughton Park, Blue Ridge Parkway, Laurel Springs, North Carolina.

1. **SEMS** recommends that biological contamination in the form of mold be removed by personnel experienced in the remediation of biologically contaminated materials. Additionally, a remediation workplan should be developed by a professional qualified as a Certified Industrial Hygienist (CIH), Certified Indoor Environmental Consultant (CIEC) or Certified Microbial Consultant (CMC).

2. **SEMS** recommends that IICRC S520-Current Issue *Standard and Reference Guide of Professional Mold Remediation* (Current issue), United States Environmental Protection Agency (USEPA) *Mold Remediation in Schools and Commercial Buildings*, EPA 402-K-01-001 (March 2001) and the Occupational Safety and Health Administration (OSHA) *A Brief Guide to Mold in The Workplace* (SHIB 03-10-10) be utilized as a guidance document during remediation activities for biologically contaminated items. Additional guidelines not listed here but used as acceptable industry reference can also be consulted.

3. **SEMS** makes no further recommendations concerning the Indoor Environmental Qualitative (IEQ) investigation at this time regarding the study site; however, **SEMS** reserves the right to modify our opinion should additional information, not available during the time of this investigation, be presented to **SEMS.**

QUALIFYING STATEMENT

SEMS has prepared this report for the exclusive use of the client. The report and its findings, conclusions, and recommendations either in part or in its entirety are not to be used or relied on by any other party without prior consent by **SEMS, the Client or assigns**. The report format is proprietary to **SEMS**, having been designed, developed, and prepared by **SEMS** at great expense and the information is secret, confidential, unique, and constitutes the exclusive property of **SEMS** and shall not be used by any third party without the prior written consent of **SEMS.** Any use thereof, other than the sole benefit of **SEMS** or the client, shall be deemed wrongful and will cause irreparable injury to **SEMS**.

SEMS presents the findings, conclusions and recommendations, therein, which are based solely on the conditions observed during the inspection and analytical results. The client should be aware that methodologies, results, conclusions, recommendations, and any remediation protocol to be written are based partially upon decisions made by the client concerning the extent of project work to be conducted and are the results of a limited sampling program conducted on a specific date(s). A different sampling program or samples taken at another time may have resulted in different conclusions, recommendations, and protocols. Additionally, **SEMS** does not make any representation or projection as to past conditions or future exposures and does not extend its findings to areas outside of the statistical representation of the completed investigation.

National Park Service
U.S. Department of the Interior

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