



Proposed Demolition of Historic Structures

Revised Environmental Assessment

PEPC 111561

April 2025



Cover photos by NPS and VHB

**US Department of the Interior – National Park Service
New River Gorge National Park and Preserve**

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Management Summary

New River Gorge National Park and Preserve (the park) was authorized as a unit of the national park system in 1978, giving the National Park Service (NPS) responsibility for managing more than 70,000 acres along the New River. Initially designated as a national river, the park was established “for the purpose of conserving and interpreting outstanding natural, scenic, and historic values and objects in and around the New River Gorge and preserving as a free-flowing stream an important segment of the New River in West Virginia for the benefit and enjoyment of present and future generations” (Public Law 95-625).

In 2020, the park’s designation changed from a national river to a national park and preserve, though its overall mission remains. Today, the park is charged with protecting and preserving 53 miles of the New River through southern West Virginia as well as much of the scenic gorge that the river created. The park has a rich history that includes the lives of the indigenous people whose presence goes back 13,400 years, the early 18th century pioneers, the post-Civil War construction of the railroad, and the influx of European Americans and African Americans to farm the land and extract its coal and lumber resources. Today, the park offers spectacular scenery of the gorge and the New River as well as a variety of recreational opportunities.

Throughout the years since the park’s authorization in 1978, the NPS has acquired numerous properties within the gorge, many of which include structures that are in various states of disrepair. Many of the structures were never intended for reuse or occupation by the NPS and/or are now abandoned, deteriorated, and overgrown with vegetation. These deteriorated structures pose a safety risk to both park staff and visitors, such as through visitors’ unauthorized entry or clambering on or in the structures. Additionally, all of the structures are an ongoing management burden to the park because they require NPS staff to inspect the structures, repair any fixtures used to bar entry into dangerous areas, and address nuisance species issues (such as rodents). To address these issues, the NPS is proposing demolition of up to 19 historic structures and one non-historic addition to a historic structure that are deteriorated, are not needed to achieve the park’s mission, and/or are a financial burden for the park.

This revised Environmental Assessment (revised EA) reflects changes made to the alternatives, affected environment, and impact analyses as a result of public comments received during the review period of the *Proposed Demolition of Historic Structures Environmental Assessment and Draft Programmatic Agreement* released on October 7, 2024. In reviewing and responding to public and agency comments, the NPS typically releases an errata documenting any changes if the determination is a Finding of No Significant Impact (FONSI). However, given the considerable public interest in this project, the NPS determined that reissuing a revised EA, with all errata directly incorporated, would better allow the public to see where changes were made and the nature of those changes. Under NPS policy, public review is not required or typically associated with the release of a revised EA.

This revised EA evaluates three alternatives: 1) take no action, 2) demolish all proposed excess historic structures, and 3) demolish proposed excess historic structures but retain or lease those with a higher potential for reuse. This revised EA analyzes the potential impacts these alternatives would have on the human environment. The following is a summary of revisions made in the revised EA:

- Updated regulation citations throughout the document to reflect current status
- Updated the title of Alternative C throughout the document to indicate the NPS is considering leasing for some structures
- Removed reference to Alternative B being the preferred alternative throughout the document
- Corrected National Register status for some structures in Table 1 and throughout the document from Potentially Eligible to Eligible
- Added consideration of leasing to the Purpose and Need in Chapter 1
- Updated the Alternative C description in Chapter 2 to reflect potential to lease some structures
- Updated the dismissal statement on leasing in Chapter 2 to clarify NPS processes and address infeasibility of leasing every structure analyzed in the revised EA
- Updated the impact analyses for Alternative C throughout Chapter 3 to reflect the potential to lease some structures
- Corrected the National Register status of the Ice House in Table 2 from Potentially Eligible to Contributing
- Updated the public involvement discussion in Chapter 4 to describe the EA public comment period
- Updated the Section 106 consultation information in Chapter 4 to reflect the latest information

This revised EA has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended (42 United States Code [USC] 4332[2] [C]); the Department of the Interior NEPA regulations (43 CFR Part 46); and NPS Director's Order #12: *Conservation Planning, Environmental Impact Analysis and Decision-Making* and the accompanying NEPA Handbook.¹

¹ Executive Order 14154, *Unleashing American Energy* (Jan. 20, 2025), and a Presidential Memorandum, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity* (Jan. 21, 2025), require the Department to strictly adhere to the National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4321 et seq. Further, such Order and Memorandum repeal Executive Orders 12898 (Feb. 11, 1994) and 14096 (Apr. 21, 2023). Because Executive Orders 12898 and 14096 have been repealed, complying with such Orders is a legal impossibility. The National Park Service verifies that it has complied with the requirements of NEPA, including the Department's regulations and procedures implementing NEPA at 43 C.F.R. Part 46 and Part 516 of the Departmental Manual, consistent with the President's January 2025 Order and Memorandum. The National Park Service has also voluntarily considered the Council on Environmental Quality's rescinded regulations implementing NEPA, previously found at 40 C.F.R. Parts 1500–1508, as guidance to the extent appropriate and consistent with the requirements of NEPA and Executive Order 14154.

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CHAPTER 1: PURPOSE AND NEED

INTRODUCTION

The National Park Service (NPS) is proposing to demolish deteriorating historic structures within the New River Gorge National Park and Preserve (the park) that are proposed to be considered “excess.” Excess structures are defined as those structures that are not required to meet the park’s needs or for the park to accomplish its mission. A structure is also considered to be excess if it has documented and extensive deficiencies such as structural damage or extensive deterioration to the point where the structure cannot be safely reused.

The historic structures proposed to be classified as excess pose a safety risk for visitors and park staff, create an unnecessary maintenance burden on park resources, are not central to the mission of the park (discussed in the paragraph below), and many are in a condition beyond economically feasible repair. While the NPS strives to preserve and protect cultural resources within its charge, in this case, staffing and funding resources are insufficient to preserve all of the historic structures within the park boundaries. Preserving all historic structures within the park is not necessary to fulfill the park mission, and the NPS must determine the best use of their limited resources to adequately protect and interpret the park’s historic and cultural values. In addition, as cultural resources are only one of many resources requiring attention in the park, park planning must strike a balance between equally important but conflicting resources or values by weighing the tradeoffs; for example, between the preservation and protection of cultural resources and the preservation of natural resources, the enhancement of visitor experience and safety, and the park’s operational concerns.

The park was authorized as a unit of the national park system in 1978 and was initially designated a national river. It was established “for the purpose of conserving and interpreting outstanding natural, scenic, and historic values and objects in and around the New River Gorge and preserving as a free-flowing stream an important segment of the New River in West Virginia for the benefit and enjoyment of present and future generations” (Public Law 95-625, Title XI). With this authorization, the NPS was given responsibility for planning, acquiring the land, developing, and managing more than 70,000 acres of land within its jurisdictional boundaries. In 1987, the park’s mission was expanded to include the “protection and enhancement of the natural, scenic, cultural, and recreational values” on the New River within the park through the West Virginia National Interest River Conservation Act of 1987 (Public Law 100-534, Section 1). In 2020, the park’s designation changed from a national river to a national park and preserve, though its overall mission remains.

Consistent with its mission for the park, the NPS protects and preserves 53 miles of the New River through West Virginia as well as much of the scenic gorge that the river created. The park has a rich history that includes the lives of indigenous peoples and the later pioneers, as well as the arrival of the railroad and the ensuing boom and bust of the coal mining and logging industries. Today, the park offers spectacular scenery of the gorge and the New River as well as a diversity of recreational opportunities.

Throughout the years since the park’s designation in 1978, the NPS has acquired numerous properties within the gorge, many of which include structures that are in various states of disrepair. Many of the structures were never intended for reuse or occupation by the NPS and are abandoned, deteriorated, overgrown with vegetation, and/or pose both a safety risk to the park staff and visitors; all of the

structures are an ongoing management burden to the park due to the staff time and cost required to inspect, repair, and maintain the structures.

As noted above, the NPS identified 19 historic structures and one non-historic addition to a historic structure as potentially excess and appropriate for demolition. These structures were evaluated by NPS employees for historic status during the planning process; they are considered historic and are either listed in or eligible for listing in the National Register of Historic Places (National Register). In general, the historic structures have an association with industries of the area such as the arrival of the railroad and the subsequent coal industry boom of the late 19th and early 20th centuries as well as with the birth of West Virginia's whitewater rafting industry in the late 20th century.

The 19 historic structures and one non-historic addition to a historic structure identified as potential candidates for demolition are identified in table 1. Appendix A: Summary Table of Proposed Excess Historic Structures provides a brief table summarizing the proposed excess historic structures, and Appendix B: Structure Review Sheets provides additional details of the condition and photographs of each structure.

PROJECT LOCATION

New River Gorge National Park and Preserve is located in West Virginia between the cities of Hinton and Fayetteville, in Fayette and Summers Counties. The park runs from Fayetteville, the county seat of Fayette County, 53 miles southeast to the city of Hinton. The proposed excess structures included in this project are located throughout the park, including in the areas of Thurmond, Dun Glen, Prince, Camp Brookside, and Richmond Bottom/SR26. The project area is shown in figure 1 and specific structure locations are shown on figures 2–7.

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TABLE 1. PROPOSED EXCESS HISTORIC STRUCTURES PROPOSED FOR DEMOLITION

NPS Facilities No.	Structure Name	Area/Location	National Register Status	Figure No.
87692	Charles Ashley Outbuilding	Thurmond	Eligible – Contributing to District	2
87691	Charles Ashley Garage	Thurmond	Eligible – Contributing to District	2
87694	May Bagoski House	Thurmond	Listed – Contributing to District	2
87696	Harold Smith House	Thurmond	Listed – Contributing to District	2
87713	Sidney Allen Ward House	Thurmond	Listed – Contributing to District	2
87698	Wedzel Young House	Thurmond	Listed – Contributing to District	2
99932	Marilyn Brown House	Thurmond	Listed – Contributing to District	2
87702	Tom Kelly House	Thurmond	Listed – Contributing to District	2
87708	Erskine Pugh Rental House	Thurmond	Listed – Contributing to District	3
97097	James Humphrey Sr. House	Thurmond	Listed – Contributing to District	3
87704	Ice House	Thurmond	Eligible – Contributing to District	3
87705	McGuffin Garage	Thurmond	Eligible – Contributing to District	3
87711	Phillip A. McClung/Meadows House	Thurmond	Listed – Contributing to District	3
3361	Dun Glen Building/Ranger Station	Dun Glen	Listed – Contributing to District	4
3367	Dun Glen Ark	Dun Glen	Eligible	4
3369	Dun Glen Boat Storage Rack	Dun Glen	Eligible	4
3368	Dun Glen Mini Ark	Dun Glen	Eligible	4
3290	Prince Brothers General Store	Prince	Listed	5
87630	Pool Chemical Treatment Building	Camp Brookside	Eligible – Contributing to District	6
87590	Vallandingham House (addition only)	Richmond Bottom/SR26	Eligible (addition is not eligible)	7

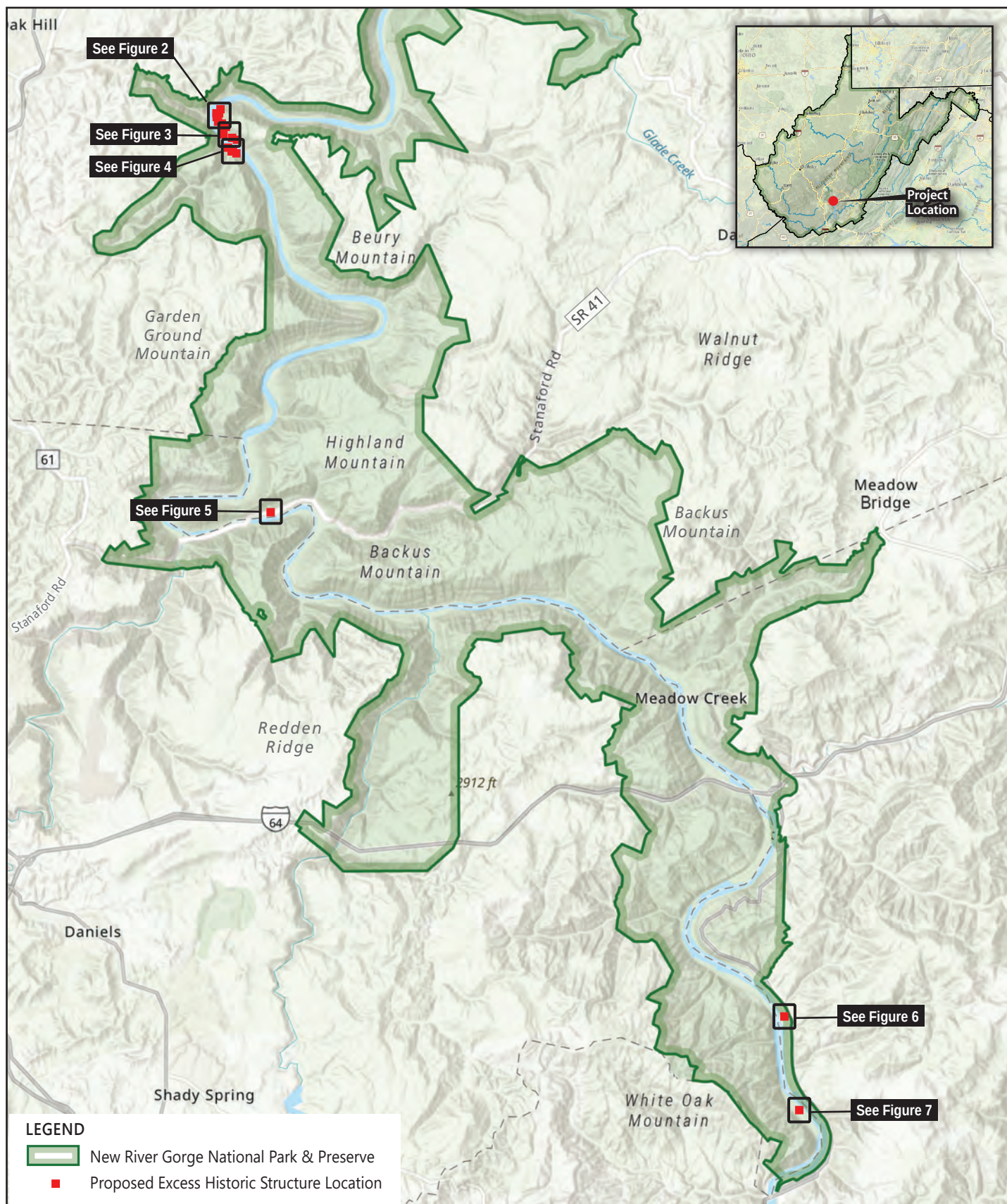


FIGURE 1

Overall Project Vicinity and Index Map

New River Gorge National Park & Preserve | West Virginia
United States Department of the Interior / National Park Service



FIGURE 2

Thurmond Area Map - North

New River Gorge National Park & Preserve | West Virginia
United States Department of the Interior / National Park Service

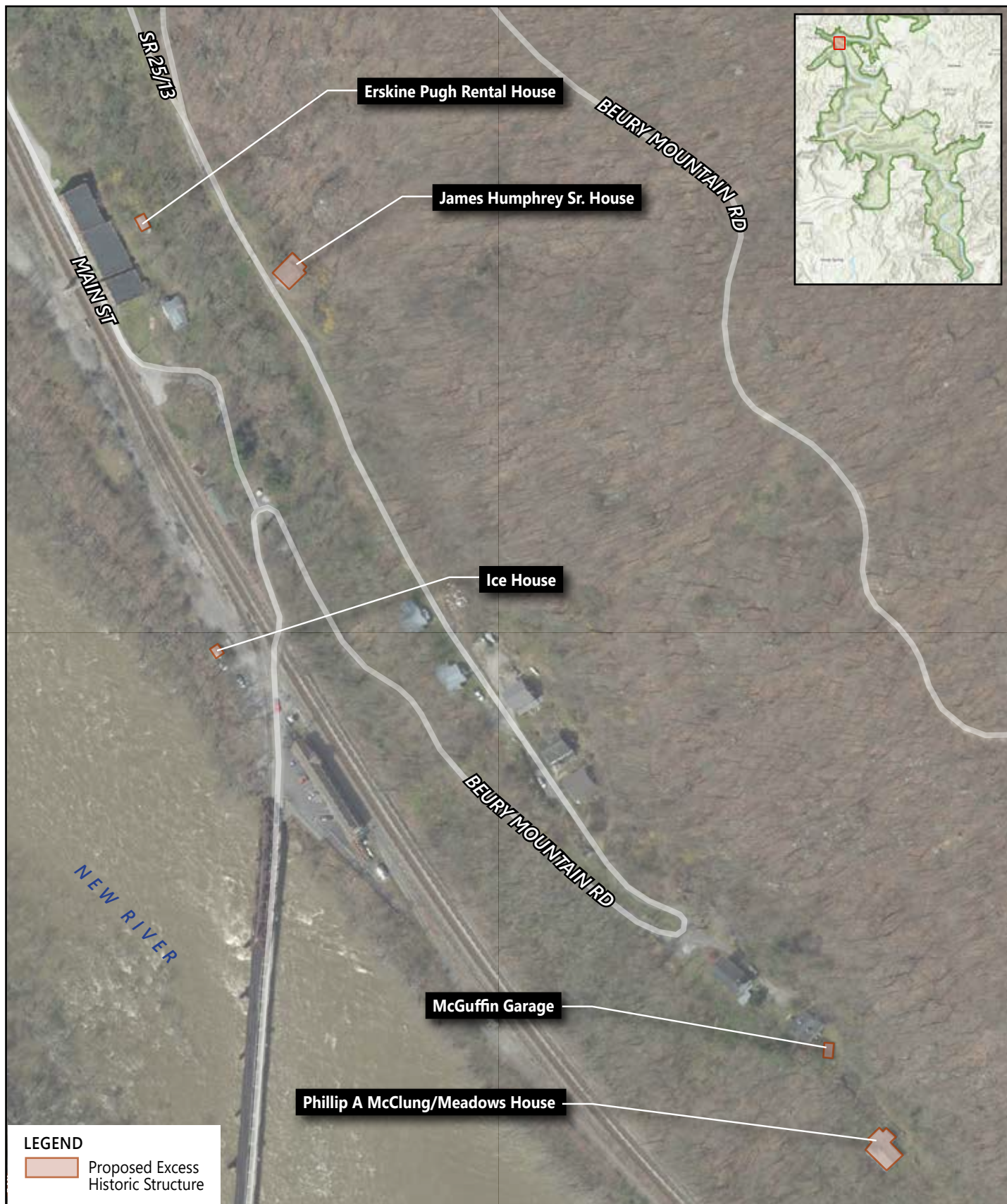


FIGURE 3

Thurmond Area Map - South

New River Gorge National Park & Preserve | West Virginia
United States Department of the Interior / National Park Service



FIGURE 4

Dun Glen Area Map

New River Gorge National Park & Preserve | West Virginia
United States Department of the Interior / National Park Service



Prince Area Map

New River Gorge National Park & Preserve | West Virginia
United States Department of the Interior / National Park Service

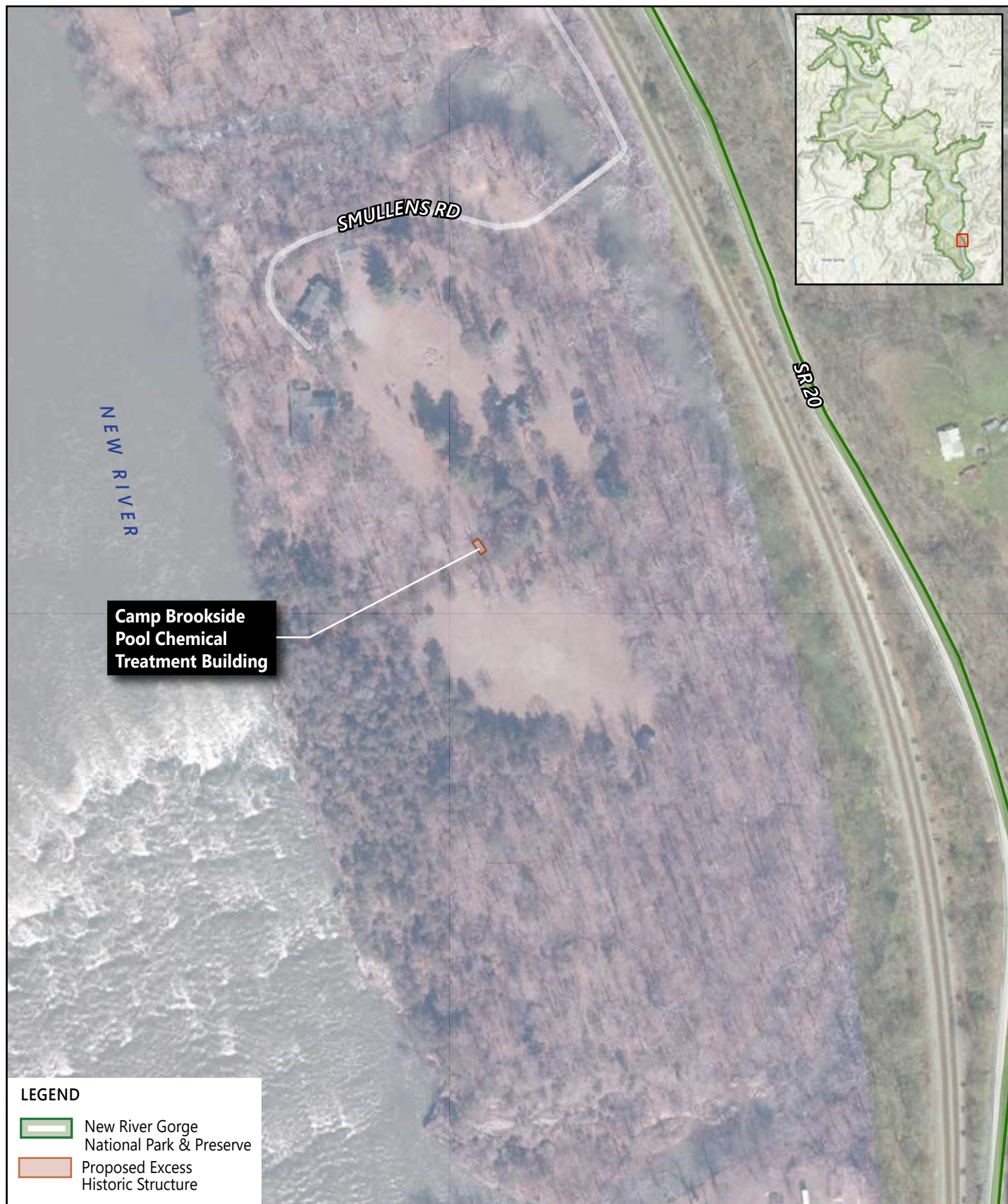


FIGURE 6

Camp Brookside Area Map

New River Gorge National Park & Preserve | West Virginia
United States Department of the Interior / National Park Service



FIGURE 7

Richmond Bottom/SR26 Area Map

New River Gorge National Park & Preserve | West Virginia
United States Department of the Interior / National Park Service

PURPOSE AND NEED

The purpose of this project has two parts: 1) reduce the risk to the health and safety of park employees and the public by demolishing or leasing deteriorated and unsafe historic structures within the park boundary and 2) reduce the maintenance burden on park resources by demolishing or leasing proposed excess historic structures that are not required to meet the park's needs or to fulfill its mission. These are further discussed below.

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

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



Figure 8. The Erskine Pugh Rental House (left) and the Camp Brookside Pool Chemical Treatment Building (right) are examples of the overgrown, deteriorated, unused structures within the park.

IMPACT TOPICS

In the context of NEPA reviews, issues can be problems, concerns, conflicts, obstacles, or benefits that would result if the proposed action or alternatives, including the no-action alternative, are implemented. Impact topics are a means of organizing the discussion of issues and analysis of impacts. During the scoping process, the NPS either retained impact topics for further analysis or dismissed them from further consideration. This section provides an overview of the impact topics that the NPS retained for analysis. The NPS retained a topic for analysis if it met one or more of the following conditions:

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

If none of the conditions above apply to an issue, the NPS *NEPA Handbook* recommends rejecting the resource concern from further consideration (NPS 2015).

For this project, the NPS identified the following impact topics to be retained and completed an impact analysis on those resources in Chapter 3: Affected Environment and Environmental Consequences:

- historic structures
- historic districts and cultural landscapes
- associated communities
- visitor use and experience

The NPS considered but dismissed the following impact topics from further analysis because they did not meet the conditions listed above for retention:

- archeological resources
- tribal ethnographic resources
- floodplains
- wetlands
- water quality
- threatened and endangered species
- migratory birds
- vegetation and wildlife
- exotic and invasive species
- hazardous materials
- air quality

Appendix C: Resources Considered discusses the rationale for why these impact topics were dismissed from further analysis.

CHAPTER 2: ALTERNATIVES

This section of the EA describes three alternative actions considered for demolition of proposed excess historic structures at the park. The description and evaluation of a no-action alternative provides a baseline to which action alternatives can be compared. This EA evaluates three alternatives: 1) Alternative A: No Action, 2) Alternative B: Demolish All Proposed Excess Historic Structures, and 3) Alternative C: Retain or Lease Proposed Excess Historic Structures with High Potential for Reuse. The elements of these alternatives are described in the following sections. Impacts associated with the alternatives are described in Chapter 3: Affected Environment and Environmental Consequences.

ALTERNATIVE A: NO ACTION

Alternative A continues the current management of these proposed excess historic structures. Under this alternative, the structures that are currently unoccupied would remain in place, continue to be unoccupied, and would continue to deteriorate. Safety hazards associated with the deteriorating structures would remain. Overgrown vegetation on these structures would not be removed or maintained, and vegetation would continue to grow around and through these structures. There would continue to be no visitor access to these structures, although opportunities for interpretation would remain.

Structures like the Dun Glen Building/Ranger Station and the Ark that are currently being used for NPS storage would continue those uses and would continue to be generally unmaintained. Only minimal maintenance actions would occur, for example if something was broken or vandalized, or to maintain electricity to the structures.

All structures would continue to be subject to vandalism, which would cause faster deterioration. Some deteriorating structures may need fencing or other security measures to keep people away, both for their safety and to protect the structures from vandalism. The structures would be expected to eventually collapse on their own.

ALTERNATIVE B: DEMOLISH ALL PROPOSED EXCESS HISTORIC STRUCTURES

Under alternative B, the NPS would demolish and properly dispose of all proposed excess structures listed in table 1, which includes 19 historic structures and one non-historic addition to a historic structure. The overgrown vegetation around the proposed excess structures would be removed as necessary to provide access to the structures. Heavy equipment would be used for demolition and specific equipment would be determined by the contractor completing the demolition work.

At the Vallandingham House, only the contemporary rear (south) addition and concrete driveway would be demolished. After demolition of the addition, the structure's south elevation would be restored, and the original (historic) log cabin would remain intact.

Any foundations and retaining walls associated with the proposed excess historic structures would be left in place where practicable to minimize ground disturbance. Some foundations may be cut to ground level with below-ground remnants left in place. For most structures, surface ground disturbance would occur in the immediate vicinity but would be limited to previously disturbed areas. In some instances, associated

underground utilities would be removed, resulting in additional ground disturbance. Above ground features associated with the structure, including utilities and access roads, would be demolished.

Because of the potential for hazardous materials to be present in the structures, a hazardous material survey was performed for proposed excess structures in September and October of 2023. Surveyors identified asbestos-containing materials and lead-based paint within most of the historic structures proposed to be excess (Arc Environmental, Inc. 2023). Hazardous materials would be addressed in accordance with NPS waste management policies as outlined in *NPS Management Policies 2006*, sections 9.1.6.1 and 9.1.6.2.

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

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

Equipment parking and staging areas would be identified on previously disturbed areas and would be managed and maintained in a way as to prevent access by visitors. Demolition activities would take place during the winter months to avoid the roosting period for threatened and endangered bats as well as the migratory bird nesting season. Revegetation would take place in the spring following demolition activities.



Figure 9. The McGuffin Garage (left) and the Wedzel Young House (right) are examples of overgrown, unsafe, deteriorated historic structures within the Thurmond Historic District that are proposed for demolition.

ALTERNATIVE C: RETAIN OR LEASE PROPOSED EXCESS HISTORIC STRUCTURES WITH HIGH POTENTIAL FOR REUSE

Under alternative C, the NPS would demolish at least 13 of the 19 proposed excess historic structures (and one non-historic addition to a historic structure) that are unstable, dilapidated, or have low potential for reuse. This alternative would retain three stable structures in the Thurmond Historic District with potential for reuse and interpretation and potentially lease three other structures if the NPS receives viable proposals. Retained structures would include the Dun Glen Ark, which is associated with the history of the commercial whitewater industry in New River Gorge; the Ice House in Thurmond, which represents a

unique railroad industry structure not otherwise represented in the Thurmond Historic District; and the Marilyn Brown house in Thurmond, which represents the simple architecture of a railroad worker's house and is easily accessible from the town's railroad level, along the main pedestrian route between Commercial Row and the Fatty Lipcomb house. The NPS may lease the Dun Glen Ark if a potential lessee submits a viable proposal that meet the Secretary of the Interior's Standards. Other structures the NPS may lease pending viable proposals include the Tom Kelly House, Dun Glen Boat Storage Rack, and Dun Glen Mini Ark. If retained for reuse, the Tom Kelly House would provide additional context for the architecture of a railroad worker's house and the Dun Glen structures would provide additional context to convey the history of the whitewater rafting industry along the New River. If the NPS does not receive viable proposals to lease these three structures, then they would be demolished. Details of the demolition and restoration process would be the same as described under alternative B above.



Figure 10. The Dun Glen Ark (left), the Marilyn Brown House (center), and the Thurmond Ice House (right) would be retained under alternative C.



Figure 11. The Tom Kelly House (left), the Dun Glen Boat Storage Rack (center), and the Dun Glen Mini Ark (right) would potentially be retained if viable lease proposals are received by the NPS.

ALTERNATIVES CONSIDERED BUT DISMISSED FROM FURTHER ANALYSIS

Reuse of Proposed Excess Historic Structures

The NPS considered and dismissed an option to reuse all proposed excess historic structures rather than demolish or lease them. For many of these structures, extensive structural damage and deteriorated condition has resulted in any repair and reuse to be infeasible. For example, the Prince Brothers General Store building has lost structural integrity due to water damage that resulted in a partial collapse of the rear wall. The Erskine Pugh Rental House in Thurmond has had the roof and exterior walls partially collapse due to storm and tree damage. The Dun Glen Building/Ranger Station, while structurally stable,

has been deemed unsafe for occupation and use due to substantial mold issues. Some structures are not needed to fulfill the park mission and are duplicative of other existing structures, such as storage buildings. Adapting and maintaining these structures for reuse would result in an additional and unsustainable maintenance burden on NPS staff and would continue to add to the park's ongoing operational costs. As a result, the historic structures considered for this project are all proposed to be excess. Therefore, this alternative would not resolve the purpose and need for taking action. See appendix B for more information about the current condition and structural integrity of each building proposed to be excess.

Lease of Proposed Excess Historic Structures

Similar to the reuse alternative considered above, the NPS also considered and dismissed an option to lease all the historic structures rather than demolish them. The NPS owns 78 historic buildings within the park. None of these buildings are leased because the park does not have the funding, staffing, or capacity to manage leasing at this time. Before leasing historic buildings, the NPS would need to complete additional planning. Because the NPS lacks the capacity to complete these steps at this time for all the historic structures proposed for demolition, this alternative is not feasible. In addition, the leasing process takes several years to complete, during which time retaining all the historic structures proposed for demolition would continue to be a maintenance burden and pose safety risks to visitors and park staff, which would not meet the purpose and need for taking action.

MITIGATION MEASURES

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse impacts to affected resources, whether under the jurisdiction of the NPS or as a result of an NPS decision. To help ensure the protection of natural and cultural resources and the quality of the human environment, the NPS may implement the following mitigation measures for alternatives B and C. This allows the NPS to meet conservation mandates as required by the Organic Act (16 USC §1 et seq.) and as further detailed in NPS *Management Policies 2006*, Section 106 of the NHPA, and the Endangered Species Act. The NPS would also implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are being properly implemented and are achieving their intended results. Additional mitigation measures to address impacts on historic and cultural resources may be implemented as agreed upon through consultation during the NHPA Section 106 process (see Chapter 4: Consultation and Coordination for a summary of the Section 106 process for this project).

- To protect air quality, use dust control management during demolition activities. Minimize ground disturbance and the frequency of vehicle traffic during high wind events. Maintain demolition equipment properly and use the cleanest fuels possible.
- Implement temporary and permanent stabilization that meets NPS structural engineering and design standards for all disturbed areas during demolition.
- Use the minimum size equipment necessary during demolition activities to minimize the area of disturbance.
- Limit demolition activities to weekday daylight hours. Implement standard noise abatement measures during demolition. Schedule interpretive programs when demolition is not being done, such as weekends, to reduce impacts to visitor experience.

- To prevent introduction of nonnative invasive plant species, inspect and clean demolition equipment prior to entering the park. Implement the Programmatic Invasive Plant Management Plan (NPS 2023) during demolition. Treat nonnative invasive plant species before and after demolition activities to limit continued growth. Restore all areas disturbed from demolition activities with native vegetation. Plant native species once demolition is completed to restore natural conditions.
- Address hazardous materials in accordance with NPS waste management policies. Test for asbestos and lead-based paint on building materials. Remove and dispose of hazardous materials properly.
- Conduct demolition and vegetation clearing activities between November 16 and the end of March to avoid sensitive nesting and roosting seasons for special status species known to occur within the park.
- To avoid impacts on wetlands, implement erosion and sediment control measures during demolition activities such as silt fences and erosion control blankets to prevent sediment from entering the wetlands. Clearly marking the boundaries of the wetland on demolition plans and in the field. Establishing buffer zones around the wetland to prevent direct impact from demolition activities.
- Require archeological monitoring during ground-disturbing activities as appropriate and in accordance with agreements made during the Section 106 process. A discovery plan would be in place and implemented in the event that archeological resources are encountered during demolition activities. Any foundations of the structures would remain in place where practicable to minimize ground disturbance.

CHAPTER 3: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter describes the current environmental conditions in and surrounding the proposed excess historic structures as they relate to each impact topic retained for analysis, as outlined in chapter 1. These conditions serve as a baseline for understanding the resources that could be impacted by implementing the project. Reasonably foreseeable environmental trends were determined for each impact topic. This chapter then analyzes the beneficial and adverse impacts that would result from implementing any of the alternatives considered in this EA.

METHODOLOGY FOR ANALYZING IMPACTS

In accordance with the DOI and NPS guidance for implementation of NEPA, direct, indirect, and cumulative impacts are described under each impact topic. Direct impacts are caused by the action and occur at the same time and place. Indirect impacts are caused by the action and occur later in time or farther removed in distance but are still reasonably foreseeable.

In considering whether the effects of the proposed action are significant, the potentially affected environment and degree of the effects of the action were analyzed. Where appropriate, mitigating measures for adverse impacts are also described and incorporated into the evaluation of impacts. The methods used to assess impacts vary depending on the resource being considered but are generally based on a review of pertinent literature and park studies, information provided by on-site experts and other agencies, professional judgment, and park staff knowledge and insight.

This EA also considers cumulative impacts, which are the effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions. The NPS considered other past, present, and reasonably foreseeable actions undertaken that have or may result in impacts on the resources affected by this project. The NPS considered reasonably foreseeable projects that would occur within the park boundary and locations immediately adjacent, and that could occur by 2030, by which time the action alternatives would be expected to be implemented.

Cumulative impacts were determined for each impact topic by combining the impacts of the alternative being analyzed and other past, present, and reasonably foreseeable future actions that would also result in beneficial or adverse impacts. A summary of other past, present, and reasonably foreseeable actions that may contribute to the cumulative impacts is below, and a discussion of those cumulative impacts is under each impact topic below.

Past, Present, and Reasonably Foreseeable Actions

Preservation of Structures within the Thurmond Historic District

Over the past twenty years, the NPS has completed many projects in the Thurmond Historic District to repair, stabilize, and/or partially rehabilitate structures that contribute to the historic district. Most recently, in 2023, the NPS conducted restoration work on the historic Thurmond Depot, including preservation and repair of windows, doors, and wood siding. Failing paint was removed and a new paint

coat was applied to create a cohesive appearance of the historic fabric of the structure. The depot was originally constructed in 1904 and served as a major stopping point for freight along the Chesapeake and Ohio Railroad during the early 20th century. The structure was rehabilitated into a visitor center for the park in 1995 and continues to serve as an active railroad passenger stop.

Deferred Maintenance of Key Cultural Resources and Deteriorating Infrastructure Systems

The NPS is currently in the planning and design process for a project proposing to stabilize and rehabilitate key historic structures in Thurmond, upgrade water and wastewater systems throughout the park, optimize and reimagine Dun Glen's site circulation and boat launch area, provide accessible paths to existing structures where feasible, and update several existing restroom facilities throughout the park.

In the Thurmond Historic District, the NPS proposes to improve the drainage patterns at Commercial Row to redirect stormwater away from the Commercial Row buildings to prevent further water infiltration. A stone ground gutter equipped with a perforated pipe would be installed along the upper side of the buildings to redirect water around Commercial Row. Stormwater systems including combination of trench drains, stormwater structures, and pipes would be installed on the gravel road to prevent backflow of water into the buildings. Water would then be directed to an underground pipe to be discharged through filtration towards the river. To further achieve this, the park would regularly clear the vegetation from behind the Commercial Row buildings and clean their gutters. This project would stabilize the following structures within the Thurmond Historic District to prevent deterioration and allow future rehabilitation and use of the structures: the National Bank of Thurmond, the Goodman-Kincaid Building, and the Mankin-Cox Building comprising Commercial Row as well as the Fatty Lipcomb, McClung, and McGuffin Houses on the hillsides.

At Dun Glen, the NPS proposes to improve circulation to enhance the visitor experience by separating public day-use spaces from NPS staff and maintenance areas. The public circulation route through the maintenance yard would be eliminated, and a turnaround would be added at the boat launch to prevent private vehicles from entering the NPS maintenance area. Public day-use facilities would be improved, and accessible routes would be created. This project would also include a complete upgrade of the electrical system to meet current code and safety regulations as well as to improve operations and lower utility costs to the NPS. The desired future use of Dun Glen, as envisioned by the 2009 New River Gorge General Management Plan, is as a riverside recreational day use area with most buildings removed from the floodplain, which is consistent with the park's mission to protect and enhance the recreational values of the river. This desired future condition would help align the area with NPS floodplain policy, which supports removing structures from flood-prone areas and restoring natural beneficial floodplain functions.

Demolish Non-Historic Structures Proposed to be Excess

The NPS is proposing to undertake other projects to demolish 30 non-historic structures across the park that are proposed to be excess. These projects would include removing hazardous structures, disposing of all associated building debris, and restoring the sites to a condition consistent with their natural surroundings. One of these non-historic structures is located at Dun Glen and another is located along the bank of the river in Thurmond.

HISTORIC STRUCTURES

Affected Environment

A historic resource survey was conducted in 2022 to evaluate the proposed excess structures to determine which are considered to be historic and either listed or eligible for listing in the National Register (Bratslavsky et al. 2022). Historic properties within the project area were evaluated using National Register eligibility criteria, based on historic contexts prepared for the area (Unrau 1996). A summary of structures considered to be individually listed in or eligible for the National Register is below, based on the information provided in the 2022 historic resource survey report. A discussion of structures contributing to the historic districts of Thurmond and Camp Brookside is included under the impact topic of Historic Districts and Cultural Landscapes, which follows. The structures individually listed in or eligible for the National Register discussed here include the Prince Brothers General Store; the Dun Glen Ark, Mini Ark, and Boat Storage Rack; and the Vallandingham House. See appendices A and B for additional information and photographs of each structure. The NPS has completed 3D scanning of all proposed excess historic structures in order to record and preserve information regarding their design, appearance, and materials.

Prince Brothers General Store

The original Prince Brothers General Store was a two-story wood frame building with a gabled roof that was probably constructed during the late 1890s. Sometime around 1935, the floor space on the building's first and second floors were expanded for commercial reasons. Its gabled roof was also replaced with a flat sloping roof. The store prospered during the coal and timber boom due to its proximity to the railroad and operated until 1984. It was listed in the National Register for its history in the areas of commerce and regional history. This historic structure is proposed for demolition in alternatives B and C due to the substantial structural deterioration, which is discussed below.



Figure 12. The Prince Brothers General Store has suffered extensive water damage, resulting in an unstable structure and collapsing rear wall (left) that continues to degrade over time. An interior beam truss system (right) was installed in 2021 as an extreme stabilization measure.

The Prince Brothers General Store is currently in poor condition due to substantial water damage caused by deterioration of the roof, gutter, and downspouts. The balloon construction of the building has pushed the exterior walls outwards 11 inches, and the structure is now listing from left to right. The roof pitch sheds water from the structure directly down the rear of the building, causing extensive damage to the framing and exterior components. Despite routine repairs and numerous focused projects to improve the

roof and drainage system over the past two decades, the rapid progressive deterioration of the building has outpaced the effort. In 2021, the NPS took extreme stabilization measures to build a base beam support system on the lower and upper floors to catch the implosion of the building. See appendices A and B for additional information on the condition of the Prince Brothers General Store.

Dun Glen Ark, Mini Ark, and Boat Storage Rack

The Dun Glen Ark, Mini Ark, and Boat Storage Rack are eligible for listing in the National Register for their association with the statewide whitewater rafting industry (Unrau 1996; Bratslavsky et al. 2022). These structures were part of the first commercial whitewater company established in West Virginia in 1968, operated by the Jon Dragan family. These structures were constructed in the late 1970s-80s and are not yet 50 years of age. However, the 2022 survey recommended that these structures and the Dun Glen area be considered for eligibility in association with the statewide whitewater rafting industry. Dun Glen was the birthplace of the New River Gorge's whitewater rafting industry and was developed as part of West Virginia's emerging recreation and tourism industries. Whitewater rafting companies continue to use the Dun Glen area to launch guided rafting trips and tell visitors about the history of Thurmond and Dun Glen (Unrau 1996). Therefore, the structures at Dun Glen are considered to be eligible for listing in the National Register.

These structures are currently used by the NPS for storage and are in stable condition. The NPS carries out routine maintenance on these structures such as repairing or replacing broken doors and hardware, clearing overgrown vegetation, maintaining light fixtures, and repairing or replacing rotting wood features. These structures are located within the floodplain due to their proximity to the New River and the first floor storage areas experience water inundation during flood events; this flooding limits the reuse potential for these structures. See appendices A and B for additional information on the condition of these structures and additional photos.



Figure 13. The Dun Glen Mini Ark (foreground), Boat Storage Rack (center), and Ark (background right) are associated with the statewide whitewater rafting industry.

Vallandingham House

The Vallandingham House is eligible for listing in the National Register as an example of a late 19th century log cabin farmhouse. A contemporary addition and driveway are located on the rear (south) of the house that caused a change in the historic appearance; however, because the rear addition is reversible and does not change the main façade of the structure, it remains eligible for listing in the National Register. Several outbuildings associated with the house remain on the property that contribute to the house's eligibility.

The Vallandingham House is currently unused and is in stable condition. The NPS carries out routine maintenance on the structure such as repairing or replacing broken windows and hardware, clearing overgrown vegetation, maintaining light fixtures, and repairing or replacing rotting wood features. See appendix A for additional information on the Vallandingham House.



Figure 14. The historic Vallandingham House (left) is a late-19th century log cabin farmhouse with a non-historic rear addition (right) which detracts from its historic character.

Environmental Trends for Historic Structures

When the land that now comprises the park was acquired by the NPS, many historic structures were acquired along with it. While some structures were restored or rehabilitated and opened to the public, others were stabilized as needed and remained vacant. As time has passed, the condition of some structures has further deteriorated at a rate that has outpaced the ability of the NPS to stabilize and restore. This has occurred with the Prince Brothers General Store, which has severe structural issues. The NPS does not have the resources necessary to continue these stabilization efforts. Other historic structures are in stable condition, such as the Ark and Mini Ark in Dun Glen, and NPS resources are focused on minimizing future deterioration by attempting to control nuisance species such as rodents and repairing locks and broken windows to keep people out of the structures. Without substantial direct action, the already deteriorated structures will continue to deteriorate, and those in stable condition but not actively maintained will eventually start to deteriorate. The cost to maintain and manage these structures will continue to increase and consume more park resources. Eventually, the most deteriorated structures will likely collapse. Historic structures that are actively maintained and used by the NPS (such as the Vallandingham House) will remain stable and will continue to convey their historic character. Overall, the trend for historic structures in the park anticipates the slow loss of the abandoned and deteriorating structures over time as a result of limited maintenance and natural processes degrading structures; structures actively maintained by the NPS will remain stable over time.

Environmental Consequences

Alternative A: No Action

Under alternative A, there would be no immediate change to the individual historic structures, and they would retain their remaining historic materials and fabric. The structures in Dun Glen and the Vallandingham House would continue in their current state for the foreseeable future because they are in relatively stable condition and the NPS conducts maintenance as needed. However, due to the extreme unstable condition of the Prince Brothers General Store, there would be a loss of historic fabric over time as this structure continues to degrade and may eventually collapse despite stabilization efforts by the NPS. Eventually, the Prince Brothers General Store would lose its historic materials, design, workmanship, feeling, and association. The foundation of the structure would remain in place as it degrades and may continue to convey the location of the former building. This overall loss of historic fabric would likely result in the Prince Brothers General Store structure no longer being eligible for listing in the National Register. Ultimately, alternative A would result in the slow but eventual loss of the historic Prince Brothers General Store due to decay.

Alternative B: Demolish All Proposed Excess Historic Structures

Under alternative B, there would be an immediate loss of historic structures of the Prince Brothers General Store and the Dun Glen Ark, Mini Ark, and Boat Storage Rack. Retaining any foundations of the structures if practicable would convey the historic location of the structure, but all other historic features of these structures would be lost. Once demolished, the historic structures would no longer be eligible for listing in the National Register. For the Prince Brothers General Store, the ultimate result of alternative B would be the same as alternative A—the loss of the historic structure—but alternative B would be a quicker demolition of the structure. The demolition of the Dun Glen Ark, Mini Ark, and Boat Storage Rack would result in the loss of historic resources associated with the early whitewater rafting industry in Dun Glen; however, many other whitewater rafting operators were active and continue to be active in the area and this would not constitute a complete loss of resources related to the important historic context in the State of West Virginia.

The demolition of the rear addition of the Vallandingham House would remove a contemporary addition that does not contribute to the history of the farmstead. This would result in a restoration of its historic character because the structure would more accurately reflect its appearance during the period of construction. The Vallandingham House would remain eligible for listing in the National Register and would better convey its history as a late 19th century log cabin farmhouse.

Alternative C: Retain or Lease Proposed Excess Historic Structures with High Potential for Reuse

Alternative C would result in similar impacts as described under alternative B, but the impact would be slightly lessened in Dun Glen because the Ark would remain. Potentially, the Dun Glen Mini Ark and Dun Glen Boat Storage Rack may also remain if the NPS receives a viable lease proposal. The Dun Glen Ark, potentially with the Dun Glen Mini Ark and Dun Glen Boat Storage Rack, would continue to convey their historic appearance and character and would provide an opportunity to convey the history of the whitewater rafting industry along the New River. All other impacts, including from demolition of the Dun

Glen Mini Ark and Dun Glen Boat Storage Rack if the NPS does not receive a viable lease proposal, would be the same as under alternative B.

Cumulative Impacts

Other past, present, and reasonably foreseeable actions that may affect historic structures include the project to address deferred maintenance of key cultural resources and failing infrastructure systems to include but not limited to wastewater, water, drainage, and electrical systems. These projects would contribute a beneficial increment to the cumulative impact on historic structures because the stabilization efforts and improvements to the associated wastewater systems would ensure that key historic structures would remain stable and in good repair within the park for the future.

Under alternative A, the continuation of current management of the proposed excess structures would result in the continued deterioration of structures that are not substantially maintained by the NPS. This deterioration of historic structures such as the Prince Brothers General Store would contribute an adverse increment to the overall cumulative impact. This would be a continuation of the current environmental trend for historic structures, which anticipates deterioration of structures over time without substantial human intervention. Therefore, alternative A would contribute to but would not appreciably change the level of adverse impacts already occurring. Taking into consideration the beneficial increment of other past, present, and reasonably foreseeable actions described above, over the long term, there would be an overall loss of some historic structures within the park as well as a continued preservation of other key historic structures under alternative A.

Under alternative B, the active removal of proposed excess historic structures would result in the immediate loss of several historic structures within the park, which would contribute an adverse increment to the overall cumulative impact. This would be an acceleration of the current environmental trend for historic structures, which anticipates deterioration of structures over time without substantial human intervention. Taking into consideration the beneficial increment of other past, present, and reasonably foreseeable actions described above, over the long term, there would be an overall loss of some historic structures within the park as well as a continued preservation of other key historic structures. Additionally, alternative B would allow park resources currently used to manage and maintain the proposed excess historic structures to be reallocated to preserve, protect, and enhance other important resources within the park.

Alternative C would contribute a similar adverse increment as would alternative B but would be to a slightly lesser degree because at least one fewer historic structure and up to three fewer structures would be demolished. All other cumulative impacts would be the same as under alternative B.

In conclusion, alternatives A, B, and C would each contribute an adverse increment to the cumulative impact due to the loss of historic structures within the park. Alternative A would result in a slow loss over time while alternatives B and C would result in a faster loss (with a somewhat lessened degree of impact under alternative C). When combined with the beneficial increment of the other past, present, and reasonably foreseeable actions, the overall cumulative impact of any alternative would be both adverse and beneficial. The impact would be adverse due to the loss of historic structures, and it would be beneficial due to the stabilization of other important historic structures throughout the park as well as park resources being reallocated to continue preservation of park resources in the long term. Even with the loss of the

proposed excess historic structures, a substantial number of historic structures would remain throughout the park, and they would remain stable and in good repair and would continue to convey the important stories of the people and history that occurred along the New River and the gorge it carved.

HISTORIC DISTRICTS AND CULTURAL LANDSCAPES

Affected Environment

Thurmond Historic District and Cultural Landscape

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

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



Figure 15. The Bank of Thurmond (left) and the Fatty Lipcomb House (right) are examples of historic buildings within the Thurmond Historic District (not included in this demolition project).

There are several different housing styles remaining in the Thurmond Historic District. The larger houses were built for the railroad managers and other professionals in the town. They are typically two stories

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

The period of time for which the Thurmond Historic District is eligible (known as the period of significance) is 1884 to 1950, which includes the construction of the first house on the land until steam engines were replaced with diesel engines and many jobs in Thurmond were lost (Harper 1984). The Thurmond Historic District retains many features from that period, such as the passenger depot, three business district buildings referred to as Commercial Row, some of the railroad features and many of the remaining houses. However, the majority of the railroad features used during the heyday of the coal industry have been removed. Built with the boomtown mentality that was prevalent during the industrial period of West Virginia, most residents and businesses of Thurmond moved on when the industry lost its prevalence; therefore, many of the structures that existed during Thurmond's peak have been lost (NPS 2001). Many of the houses remaining in the Thurmond Historic District are in very poor and deteriorated condition.

Landscape features that contribute to the period of significance and the cultural landscape remain intact including the views of the steep hills and gorge, the circulation system, and the overall spatial organization. The circulation system primarily consists of the railroad tracks and the bridge across the river. The overall spatial organization includes the tracks and commercial district spaced linearly along the floodplain of the river with the majority of the houses perched on the hillside above. The landscape in the district has been altered dramatically since the period of significance by the growth of heavy vegetation including invasive plants such as kudzu (NPS 2001).



Figure 16. The Sidney Allen Ward House (left) and the Harold Smith House (right) are examples of houses for railroad managers and railroad workers, respectively; both are proposed to be excess.

A total of 45 contributing structures were documented in the 1984 National Register nomination form for the Thurmond Historic District, including 16 that are considered to be pivotal structures with the highest

importance to the historic district. For the purposes of this document, contributing and pivotal structures within the Thurmond Historic District are collectively referred to as “contributing structures” unless otherwise specified. Today, there are 39 remaining contributing structures from the original National Register nomination form, including 15 pivotal structures. It should be noted that outbuildings and garages were not included as part of the original 45 contributing structures, but many have since been evaluated as contributing elements to the district along with numerous associated retaining walls and other landscape features in the 2001 cultural landscape inventory and the 2022 historic resources survey (NPS 2001; Bratslavsky et al. 2022).

The 14 proposed excess structures located within the Thurmond Historic District are considered to be contributing resources to the district; 10 of those were listed in the original 1984 National Register form, including 1 pivotal resource. These structures are as listed in table 2 below and each are further described in appendices A and B. These structures consist of nine houses, three outbuildings, one railroad support structure, and one remnant of a former hotel. These structures are summarized below. The NPS has completed 3D scanning of all proposed excess structures located within the Thurmond Historic District in order to record and preserve information regarding their design, appearance, and materials.

TABLE 2. LIST OF PROPOSED EXCESS STRUCTURES IN THURMOND HISTORIC DISTRICT

Structure Name	Type	Documentation	Status
Charles Ashley Outbuilding	Outbuilding	2001 Cultural Landscape Inventory	Contributing
Charles Ashley Garage	Outbuilding	2001 Cultural Landscape Inventory	Contributing
May Bagoski House	House	1984 National Register Form	Contributing
Harold Smith House	House	1984 National Register Form	Contributing
Sidney Allen Ward House	House	1984 National Register Form	Contributing
Wedzel Young House	House	1984 National Register Form	Contributing
Marilyn Brown House	House	1984 National Register Form	Contributing
Tom Kelly House	House	1984 National Register Form	Contributing
Erskine Pugh Rental House	House	1984 National Register Form	Contributing
James Humphrey Sr. House	House	1984 National Register Form	Contributing
Ice House	Support Structure	2022 Historic Resource Survey	Contributing
McGuffin Garage	Outbuilding	2001 Cultural Landscape Inventory	Contributing
Phillip A. McClung/Meadows House	House	1984 National Register Form	Contributing
Dun Glen Building/Ranger Station	Remnant	1984 National Register Form	Pivotal Structure

The nine houses and three outbuildings are all located along the hillsides of Thurmond east of the railroad tracks. The houses vary in size based on the type of residence, either for management or for workers, as described in the paragraphs above. The three outbuildings are each small, one-story sheds or garages that supported the residences. All of the proposed excess houses and outbuildings are abandoned, undermaintained, and heavily deteriorated. See appendices A and B for more detail of each of these houses and outbuildings.

The proposed excess railroad support structure consists of the Ice House, a small one-room frame structure that was used to store ice that would be loaded onto train cars for refrigeration of perishable goods. Located just to the west of the railroad tracks, the Ice House was moved from its original foundation by about 20 feet. The original foundation remains in place and is visible above ground. The Ice House is currently in stable condition and is used by the NPS to house water treatment and testing equipment. See appendices A and B for more detail of the Ice House.

The final proposed excess structure located in the Thurmond Historic District is the Dun Glen Building/Ranger Station, which is located on the south side of the New River. This structure is the re-roofed first floor remnant of the west wing of the 1900 Dun Glen Hotel, built by William McKell, that was destroyed by an arson fire in 1930. The building represents the last remaining above-ground portion of the former hotel, a pivotal structure to the Thurmond Historic District; however, it is only a small portion of the much larger pivotal structure that includes the below-ground foundation of the former hotel. The foundation of the former hotel remains intact below ground, including physical evidence of the intense fire (Franz et al. 2023). In the late 20th century, the structure was used as a staff building by Whitewater Expeditions Unlimited, the first whitewater rafting company in southern West Virginia, which was established by the Dragan brothers in 1968. The Dun Glen Building/Ranger Station is currently in stable condition and used for NPS storage space. See appendices A and B for more detail of the Dun Glen Building/Ranger Station.



Figure 17. The Dun Glen Building/Ranger Station is a remnant of the former Dun Glen Hotel, which was documented as a pivotal structure to the Thurmond Historic District.

Camp Brookside Historic District and Cultural Landscape

Camp Brookside is located on the east bank of the New River in the Upper Gorge area of the park. The 30-acre camp was designed in 1947 and constructed in 1948 as a recreational summer camp for the children of employees of the Electro Metallurgical Company (NPS 2002). Elkems Metal, as the company was also called, was a division of the Union Carbide Company that produced chemicals in the mid-20th century. The camp consisted of the main campsite with an administration building, cabins, and water tower with an open field in the center, a swimming pool, athletic fields, and natural areas. The company also used the camp for company picnics for employees and their families. In 2013, the NPS determined the camp was eligible for listing in the National Register as a historic district and cultural landscape

(Bratslavsky et al. 2022). A cultural landscape inventory was completed in 2002 to document the contributing landscape features of Camp Brookside (NPS 2002). A summary of the historic district and cultural landscape is below.

According to the West Virginia Historic Property Inventory Form for Camp Brookside, the original spatial organization, circulation, and original structures of the camp remain intact and contribute to the historic landscape (NPS 2013). A main entry drive provides access to the camp from Route 20, leading to a parking lot. The main cabin area where the boys and girls bunked consists of six cabins encircling a shared wash house. Camp facilities create an outer semi-circle around the cabins including an administration building, hospital cabin, caretaker's residence, and swimming pool (with the associated pool chemical treatment building). To the south of the cabins are athletic fields and natural areas. The buildings generally share the same architectural design of frame construction on concrete block piers with side gabled roofs and board-and-batten siding. The pool chemical treatment building has a more utilitarian appearance of concrete block and flat roof. The swimming pool has since been filled in, but the diving board, concrete deck, and other evidence of the pool are still visible. Camp Brookside retains its historic setting and character as a natural and picturesque landscape along the New River (NPS 2013).



Figure 18. Aerial photograph of Camp Brookside showing pool's chemical treatment building (circled) and other historic structures with New River's Brooks Falls to the left (George Bragg, photographer).



Figure 19. The cabins and structures at Camp Brookside are part of picturesque cultural landscape.

The cultural landscape inventory for Camp Brookside classified the pool chemical treatment building, which was built along with the pool in the early 1950s, as a contributing resource to the historic district and cultural landscape. The structure is a rectangular, concrete block building built into a slope, so it is partially below grade. Although the associated swimming pool has since been filled, the building remains eligible as a contributing resource to Camp Brookside. See appendices A and B for more detail of the pool chemical treatment building.



Figure 20. The Camp Brookside Pool Chemical Treatment Building, partially obscured from view from the main camp areas by topography and vegetation.

Environmental Trends for Historic Districts and Cultural Landscapes

When the land that now comprises the park was acquired by the NPS, several historic districts and cultural landscapes were acquired along with it. While some structures within these historic districts and cultural landscapes were restored or rehabilitated and opened to the public, such as the Thurmond Depot and most structures at Camp Brookside, many were stabilized as needed and remained vacant, such as the houses in the Thurmond Historic District. As time has passed, the condition of the structures has further deteriorated at a rate that has outpaced the ability of the NPS to stabilize and restore. Entrance to many contributing resources is no longer viable and NPS resources are focused on minimizing further damage to these structures by attempting to control nuisance species such as rodents and repairing locks and

broken windows to keep people out of the structures. Without direct action, the already deteriorated structures will continue to deteriorate. The cost to maintain and manage these structures will continue to increase and consume more of the park's limited resources. Eventually, the most deteriorated structures will collapse. Structures within these historic districts and landscapes that are actively maintained and used by the NPS will remain stable and will continue to convey the historic character of the districts and landscapes. Overall, the trend for historic districts and cultural landscapes in the park anticipates the slow loss of the abandoned and deteriorating structures over time as a result of limited maintenance and natural processes degrading structures; structures actively maintained by the NPS within these historic districts and cultural landscapes will remain stable over time.

Environmental Consequences

Alternative A: No Action

Thurmond Historic District and Cultural Landscape

Under alternative A, there would be no immediate change to the Thurmond Historic District. All the extant contributing resources would remain in place and the district and cultural landscape would retain its existing historic character. The proposed excess structures within Thurmond would continue to contribute to the district and cultural landscape while they remain standing. The Ice House would remain in stable condition and could continue to be used by the NPS for housing water system equipment. Similarly, the Dun Glen Building/Ranger Station would continue to be a physical representation of a portion of the former Dun Glen Hotel as well as Dun Glen's white water rafting history, though there would continue to be no formal interpretation of that history. The remaining foundation of the former hotel would continue to remain in place.

In the long term, due to the poor condition of the proposed excess houses and outbuildings, there would be a loss of historic fabric over time as these structures continue to degrade and may eventually collapse. Any foundations of the houses and outbuildings would remain in place as the structures deteriorate and could convey the historic location of these structures; however, the historic design, materials, workmanship, feeling, and association would be slowly lost over time. The Ice House and the Dun Glen Building/Ranger Station would continue to be stable in the long term as the NPS would continue to implement routine repairs as needed. Ultimately, alternative A would result in a slow but eventual loss of historic structures that contribute to the historic districts due to decay.

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

Camp Brookside Historic District and Cultural Landscape

The Camp Brookside Historic District would be impacted to a lesser extent than the Thurmond Historic District, but the type of impacts would be similar. The continued degradation of the Pool Chemical Treatment Building would somewhat detract from the historic character of the historic district, but as it is set partially within a slope, the structure is mostly screened from view from most of the historic district. Alternative A would result in a slow but eventual loss of the historic structure over time due to deterioration and decay, which would be a loss of a contributing resource to the historic district. However, the resources most important to the historic district and landscape (such as the cabins, administration building, athletic fields, and water tank) would remain intact and would continue to be maintained. Therefore, the Camp Brookside Historic District would remain eligible for listing in the National Register under alternative A.

Alternative B: Demolish All Proposed Excess Historic Structures

Thurmond Historic District and Cultural Landscape

Under alternative B, a total of 14 contributing historic structures would be demolished in the Thurmond Historic District including a portion of one pivotal structure, the Dun Glen Building/Ranger Station. See figure 20 for a map of the contributing structures to be demolished and those to be retained within the historic district. Demolition of these contributing resources would result in a loss of integrity of design, materials, and workmanship within the district. However, most of these structures are in such poor condition that much of their integrity of design and workmanship has already been lost. The overgrown, degraded, and collapsed appearance of these structures does not reflect the historic district's period of significance and does not convey its history as a thriving boomtown. Records of the historic design, appearance, and materials would be preserved through the 3D scans that have been completed for all of the contributing structures in the Thurmond Historic District proposed for demolition. After demolition, any remaining foundations of these structures (left in place where practicable) would allow the park to continue to tell the story of the former structures within the historic district, including their locations and physical relationships to the core of the historic district along the railroad. The ultimate result of alternative B would be the same as alternative A—the loss of contributing resources—but alternative B would be a quicker loss of the structures.

After implementation of alternative B, a total of 29 contributing structures (including 14 pivotal structures) from the original National Register nomination would remain in the Thurmond Historic District. Additionally, numerous contributing features such as retaining walls and outbuildings documented in the cultural landscape inventory would remain in the Thurmond Historic District. These structures would include representation of each of the contributing housing types as well as commercial structures and railroad support structures. Demolition of the Ice House under alternative B would result in the loss of this railroad support structure, which is not otherwise represented in the historic district; however, this structure is not considered a pivotal structure to the district, and it has been previously moved from its historic location. Demolition of the Dun Glen Building/Ranger Station would remove the last above-ground remnant of the former Dun Glen Hotel; however, this would constitute removal of only a portion of the pivotal structure. The foundation of the former hotel, which comprises the rest of the pivotal structure, would remain in place to convey the historic location of the hotel that was lost to arson fire in the 1930s.

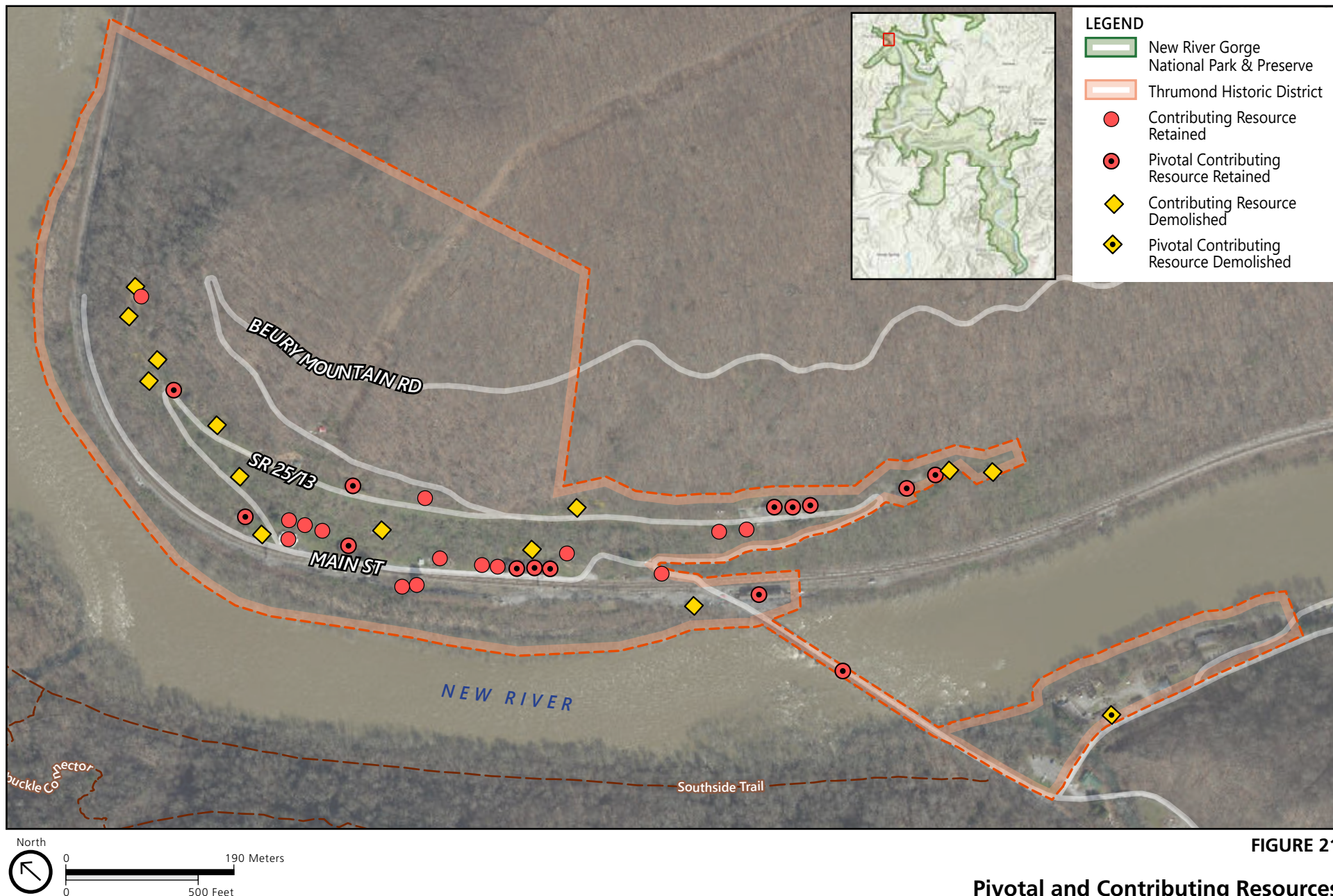


FIGURE 21

Pivotal and Contributing Resources in the Thurmond Historic District

New River Gorge National Park & Preserve | West Virginia
United States Department of the Interior / National Park Service

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

Camp Brookside Historic District and Cultural Landscape

Under alternative B, one contributing resource of the Camp Brookside Historic District would be lost, resulting in a partial loss of integrity of materials, workmanship, and association of the overall district and cultural landscape. However, some of the structure's integrity has already been lost. The current overgrown and abandoned appearance of this structure does not reflect the historic district's period of significance and does not convey its history as a summer camp supporting a swimming pool. The ultimate result of alternative B would be the same as alternative A—the loss of a contributing resource—but alternative B would be a quicker loss.

Though a contributing resource would be lost, the overall character and historic integrity of the Camp Brookside Historic District would remain intact. The overall spatial organization, major contributing resources such as cabins and recreational facilities, and the circulation patterns would remain unchanged. The buildings and structures that would remain within the district would continue to convey their history and association as a summer camp for children of employees. Therefore, the Camp Brookside Historic District would remain eligible for listing in the National Register under alternative B.

Alternative C: Retain or Lease Proposed Excess Historic Structures with High Potential for Reuse

Thurmond Historic District and Cultural Landscape

The impacts of alternative C on the Thurmond Historic District would be similar in nature to those described under alternative B but would be to a slightly lesser degree. Retaining the Marilyn Brown House would retain historic integrity of the district adjacent to the rail corridor near the important Commercial Row, which is highly visible and accessible for visitors to Thurmond. The Marilyn Brown House would serve as an example of one of the many railroad workers' houses that were vital to support the thriving town that developed around the rail yard. Retaining the Thurmond Ice House would also maintain some historic integrity in the vicinity of Commercial Row, conveying a utilitarian function that is not otherwise interpreted in the historic district. The NPS would lease the Tom Kelly House if the park receives a viable proposal for the structure and this potential reuse of the structure could be an additional

example of some of the homes in the area but would not be necessary for the Historic District. The Thurmond Historic District would remain eligible for listing in the National Register under alternative C.

Camp Brookside Historic District and Cultural Landscape

The impacts of alternative C on the Camp Brookside Historic District would be the same as described under alternative B.

Cumulative Impacts

Other past, present, and reasonably foreseeable actions that may affect historic districts and cultural landscapes include the preservation of structures within the Thurmond Historic District and the project to address deferred maintenance of key cultural resources and failing infrastructure systems to include but not limited to wastewater, water, drainage, and electrical systems. These projects would contribute a beneficial increment to the cumulative impact on historic districts, particularly the Thurmond Historic District because the stabilization and restoration of pivotal structures (such as the Thurmond Depot and structures along Commercial Row) would ensure that representative structures would continue to convey the history of the Thurmond Historic District. These structures chosen for stabilization and restoration are located in the core of Thurmond and are best representative of the coal industry and the importance of the railroad to the district.

Under alternative A, the continuation of current management of the proposed excess historic structures would result in the continued deterioration of structures that are not substantially maintained by the NPS. This deterioration of structures contributing to historic districts and cultural landscapes would contribute an adverse increment to the overall cumulative impact. This would be a continuation of the current environmental trend for historic districts and cultural landscapes, which anticipates deterioration of contributing structures over time without substantial human intervention. Therefore, alternative A would contribute to but would not appreciably change the level of adverse impacts already occurring. Taking into consideration the beneficial increment of other past, present, and reasonably foreseeable actions described above, over the long term, there would be an overall loss of some contributing structures within the historic districts as well as a continued preservation of structures currently maintained under alternative A.

Under alternative B, the active removal of proposed excess historic structures would result in the immediate loss of structures contributing to the historic districts and cultural landscapes of Thurmond and Camp Brookside. This loss of structures contributing to historic districts and cultural landscapes would contribute an adverse increment to the overall cumulative impact, and it would be an acceleration of the current environmental trend for historic districts and cultural landscapes, which anticipates deterioration of contributing structures over time without substantial human intervention. Taking into consideration the beneficial increment of other past, present, and reasonably foreseeable actions described above, there would be an overall loss of some contributing structures within the historic districts as well the preservation of important and pivotal structures within the historic districts. Additionally, alternative B would allow park resources currently used to manage and maintain the proposed excess structures to be reallocated to preserve, protect, and enhance other important resources within the park.

Alternative C would contribute a similar adverse increment as would alternative B but would be to a slightly lesser degree because at least two fewer contributing structures and up to three fewer structures

would be demolished within the Thurmond District. All other cumulative impacts would be the same as under alternative B.

In conclusion, alternatives A, B, and C would each contribute an adverse increment to the cumulative impact due to the loss of contributing resources within historic districts. Alternative A would result in a slow loss over time while alternatives B and C would result in a faster loss (with a somewhat lessened degree of impact under alternative C). When combined with the beneficial increment of the other past, present, and reasonably foreseeable actions, the overall cumulative impact of any alternative would be both adverse and beneficial. The impact would be adverse due to the loss of contributing resources, and it would be beneficial due to the stabilization of pivotal structures within the Thurmond Historic District as well as park resources being reallocated to continue preservation of park resources in the long term. Even with the loss of contributing structures, the Thurmond and Camp Brookside Historic Districts would continue to retain enough historic integrity to convey their history due to the past, present, and reasonably foreseeable actions to stabilize, preserve, and rehabilitate other contributing structures within these districts and cultural landscapes. Therefore, the historic districts and cultural landscapes within the park would remain listed in or eligible for listing in the National Register.

ASSOCIATED COMMUNITIES

Affected Environment

The park boundary encompasses a diverse landscape as a result of property acquisition in the years following the designation of the park as a unit of the national park system; the communities in and around the park have generational association with many of the structures being evaluated in this EA. In some cases, the structures are part of family homesteads and several are located in close proximity to residential communities, making them a part of the fabric of the active daily lives of many residents. These community connections exist in various parts of the project area, including both Dun Glen and Thurmond. Several structures, including those in Thurmond, Dun Glen, Vallandingham, Prince Brothers General Store, and Camp Brookside, are also within close proximity to residential neighborhoods.

Some of these communities are associated with important state and local history such as early homesteading, the 18th-20th century coal and lumber industry, and the late 20th century whitewater rafting industry. The structures within these areas are also tied to the community identity and Appalachian culture of these associated families, providing physical representation of their history. In fact, some of the buildings were built by family members of those still living in the community. This is particularly evident in the Town of Thurmond, where several descendants of the original community members reside today. The proposed excess structures contribute to these communities through physical representations of their history and community identity.

African American communities in particular have strong ties to the park and certain parts of the project area, including Dun Glen and Thurmond. A prominent black church was once located near Dun Glen in the former Dun Glen Hotel ca. 1913-1914, which served as an important socialization space and forum for community events (EDAW, Inc. et al. 2010). African American communities were also an important part of the coal mining industry and railroad camps in the area. In many cases, descendants of associated families continue to reside in and around the park and maintain their personal connection to those communities (EDAW, Inc. et al. 2010).

Environmental Trends for Associated Communities

Associated communities in and adjacent to the park will continue to be present for the foreseeable future, and their connections to the structures within the park boundaries will remain. The unmaintained structures these communities are associated with will continue to deteriorate over time without substantial human intervention. It is anticipated that the interior of the proposed excess structures would continue to be inaccessible to these associated communities, largely due to the deteriorated condition of many of the structures. As the structures have continued to deteriorate over time, entrance to many is now not safe. Park resources are focused on attempting to control nuisance species such as rodents, and human safety such as repairing broken locks and trying to keep people out of the deteriorated structures. Without direct action, the buildings will continue to deteriorate and the risk to visitor and staff safety will increase. The cost to maintain and manage the structures will continue to increase and consume more park resources. Eventually, the most unstable structures will collapse; should this occur while someone is within or near the structures it could result in severe injury or loss of life. Overall, the trend for associated communities is that they will remain present, but the structures to which they are associated will continue to deteriorate and many will eventually be lost over time.

Environmental Consequences

Alternative A: No Action

Under alternative A, residences and communities would continue to be located adjacent to the project areas and are in some instances in close proximity to dilapidated structures. In the short term, under alternative A, associated community members would continue to be able to view and experience the historic structures. The length of time the structures would remain standing without intervention is unknown due to a wide variety of factors including existing condition and natural events such as rainfall and storms. Structures that are stable and actively used and maintained by the NPS such as the Dun Glen Ark and Mini Ark are expected to remain standing for the foreseeable future. Structures already in poor condition such as many of the unoccupied houses in Thurmond are expected to continue to deteriorate and likely collapse over time. There would be a gradual change in the community members' ability to experience the historic nature of the structures already in poor condition. The deteriorating structures would then continue to diminish the appearance and character of the associated communities. Additionally, deteriorating structures may pose safety hazards for nearby residents and would continue to attract more nuisance animals such as rodents, which could pose health hazards to residents. Hazardous materials such as asbestos-containing materials and lead-based paint are known to occur within many of the proposed excess historic structures; the slow and uncontrolled deterioration of those structures may result in these hazardous materials being released into the environment. Ultimately, alternative A would result in a slow but eventual loss of many historic structures that contribute to the historic identity of these associated communities.

Alternative B: Demolish All Proposed Excess Historic Structures

Under alternative B, the proposed excess structures that contribute to the identity of the associated communities would be demolished. Structures to which individuals have personal and familial ties would be demolished, which would be an adverse impact to those associated people and their community identity. Many of the proposed excess structures no longer fully reflect the historic appearance or identity of these communities due to their deteriorated nature and because they are no longer in use as their

original functions (residential, commercial, etc.); however, the intrinsic value of the structures as a representation of community identity, would be lost. After demolition of the structures, revegetation of the landscape would restore some of the natural setting in which these associated communities were established. Although post-demolition landscape treatments have not yet been determined, the changed landscape resulting from alternative B could have potential beneficial impacts on associated community members by expanding open space. The demolition of proposed excess historic structures under alternative B would be conducted in a controlled manner and all hazardous materials would be disposed properly, which would be a benefit to the health and safety of the nearby residents and associated community members. The ultimate result of alternative B would be similar to alternative A—the loss of historic structures associated with communities; however, the impact would be greater than alternative A because structures that are expected to remain stable over time such as the Dun Glen Ark and Mini Ark would be lost to these associated communities under alternative B and because the loss would occur immediately rather than over time.

In the short term, demolition (e.g., use of heavy machinery, presence of work crews) would temporarily increase noise within the vicinity of these adjacent communities. Best management practices would be implemented during demolition activities to minimize the noise impacts on nearby residents. Permanent noise would be similar to current conditions and would not add to baseline conditions.

Alternative C: Retain or Lease Proposed Excess Historic Structures with High Potential for Reuse

Alternative C would result in similar impacts as described under alternative B, but the impact would be slightly lessened for Thurmond and Dun Glen because at least three more structures and up to six more structures would remain. In Dun Glen, the loss of structures would be reduced to at least three and potentially as few as one rather than four. Alternative C would retain the Dun Glen Ark; this building is one of the representatives of the early whitewater rafting industry along the New River, which would help to retain more of the historic identity of the location and the associated community. This alternative may also lease the Dun Glen Mini Ark and Dun Glen Boat Storage Rack if the NPS receives a viable lease proposal; these buildings provide further representation of the New River's whitewater rafting industry. In Thurmond, alternative C would retain the Ice House and the Marilyn Brown House. Retaining both of these would have beneficial impacts for associated communities by leaving buildings to which communities have historic family ties. This alternative may also lease the Tom Kelly House in Thurmond if the NPS receives a viable lease proposal, which would slightly increase beneficial impacts to the communities.

Cumulative Impacts

Other past, present, and reasonably foreseeable actions that may affect associated communities include the preservation of structures within the Thurmond Historic District; the project to address deferred maintenance of key cultural resources and failing infrastructure systems to include but not limited to wastewater, water, drainage, and electrical systems; and the demolition of non-historic proposed excess structures. These projects would contribute a beneficial increment to the cumulative impact on associated communities, particularly in Thurmond. These projects would stabilize, preserve, and maintain key structures that are important to the historic identity of Thurmond as a thriving railroad town during the boom of the coal industry. Demolishing proposed excess non-historic structures would remove safety hazards of decaying structures that do not meaningfully contribute to the historic identity of associated communities.

Under alternative A, the continuation of current management of the proposed excess structures would result in the continued deterioration of structures associated with the identity of nearby communities that are not actively maintained by the NPS. This deterioration of historic structures such as many unoccupied houses in Thurmond would contribute an adverse increment to the overall cumulative impact. This would be a continuation of the current environmental trend for associated communities, which anticipates deterioration of associated structures over time without substantial human intervention. Therefore, alternative A would contribute to but would not appreciably change the level of adverse impacts already occurring. Taking into consideration the beneficial increment of other past, present, and reasonably foreseeable actions described above, over the long term, there would be an overall loss of historic structures associated with nearby communities as well as a continued preservation of some structures currently maintained under alternative A.

Under alternative B, the active removal of proposed excess historic structures would result in the immediate loss of structures important to the associated communities, which would contribute an adverse increment to the overall cumulative impact. This would be an acceleration of the current environmental trend for associated communities, which anticipates deterioration of associated structures over time without substantial human intervention. Taking into consideration the beneficial increment of other past, present, and reasonably foreseeable actions described above, this would mean an overall loss of structures associated with community character and identity as well as the preservation of other important historic structures related to the history and identity of these associated communities. Additionally, alternative B would allow park resources currently used to manage and maintain the proposed excess structures to be reallocated to preserve, protect, and enhance other important resources within the park.

Alternative C would contribute a similar adverse increment as would alternative B but would be to a slightly lesser degree because at least three and up to six fewer associated structures would be demolished. All other cumulative impacts would be the same as under alternative B.

In conclusion, alternatives A, B, and C would each contribute an adverse increment to the cumulative impact due to the loss of structures associated with community identity and character. Alternative A would result in a slow loss over time while alternatives B and C would result in a faster loss (with a somewhat lessened degree of impact under alternative C). When combined with the beneficial increment of the other past, present, and reasonably foreseeable actions, the overall cumulative impact of any alternative would be both adverse and beneficial. The impact would be adverse due to the loss of these structures important to associated communities, and it would be beneficial due to the long-term stabilization and preservation of other important and pivotal structures to which these communities are associated, particularly in Thurmond. The associated communities within and adjacent to the park would continue to remain for the foreseeable future, and many associated structures (such as the Thurmond Depot and Commercial Row) would be preserved and rehabilitated in order to continue to convey the associated community character and identity such as in Thurmond.

VISITOR USE AND EXPERIENCE

Affected Environment

Recreational opportunities vary by parts of the project area; in Dun Glen, for example, the opportunities are generally focused on trails and the river, including hiking, camping, fishing, and river rafting. In other

parts of the project area, particularly in Thurmond, visitor opportunities focus more on exploring the area's history, where visitors can learn the stories of the past from native people to early European homesteads and through the coal and lumber industrial booms in the 18th to mid-20th centuries. Some parts of the project area experience little or no visitation such as at the Prince Brothers General Store and the Vallandingham House.

The proposed excess historic structures are scattered throughout the park in different use areas, and none are formally interpreted or accessible to visitors. While not formally part of the recreation use of the park, visitors are able to experience the structures from the outside due to their locations near park, county, and state roads. In addition, visitors are able to gain unauthorized access to some of the buildings and in some cases are able to vandalize them. At Thurmond, visitors currently experience the former boomtown from the main road along the rail corridor where they can visit the historic Thurmond Depot, see the remaining buildings at Commercial Row, and view a few of the former railroad employee houses from a distance. Most of the proposed excess structures in Thurmond are located on the hills above the rail corridor, obscured from view by dense vegetation. Visitors are not permitted to enter any of the proposed excess structures in Thurmond due to the safety risks presented.

At Dun Glen, the primary visitor use is the day use area and boat launch. As rafting companies launch and arrive there, visitors use the picnic shelters, visitor restrooms, and boat launch facilities while in the area for their trip. Private boating visitors also use the area, in addition to the commercial use. Other recreational use of this part of the project area includes angling on the river. Additional visitor use at Dun Glen includes youth groups, including class groups during the school year and camps during the summer. Families can also reserve the picnic shelter for private functions. The proposed excess structures in Dun Glen are currently used as NPS space and are not interpreted for visitors. The Dun Glen Building/Ranger Station sits within the NPS maintenance complex, which is separated from the visitor day use area, and it is not currently interpreted for visitors. The Ark, Mini Ark, and Boat Storage Rack are located adjacent to the existing boat launch area across the access road from the river. There is no interpretive information on the whitewater rafting history of Dun Glen or the association of the Ark, Mini Ark, and Boat Storage Rack with the industry.

The Prince Brothers General Store, located along route 41 near the Prince train station, is easily visible for visitors traveling by car or train. Though some visitors may stop to view the exterior of the store, it is not identified in any park informational signage, it is not formally interpreted for visitors, and it is not part of a major visitor use area.

The Camp Brookside Pool Chemical Treatment Building is located within Camp Brookside, which is currently used as an environmental education center and overnight group camp. Visitors are able to use and enjoy the facilities at Camp Brookside, but the Pool Chemical Treatment Building is not part of the visitor experience. The associated pool no longer exists, and the structure is located out of view from the main portion of the camp. The structure no longer serves a visitor experience function.

The Vallandingham House is located within a residential neighborhood. Though visitors passing by the neighborhood along New River Road may view the log cabin structure, it is not formally interpreted as a late-19th century log cabin farmhouse.

Environmental Trends for Visitor Use and Experience

Visitation at the park has been trending upwards for more than a decade; annual recreation visitation at the park was 1,707,223 in 2023, which is an increase of almost 60% since 2013. Seasonal visitation trends indicated use is heaviest from May to October, with peak use during July. The park anticipates a likely continuation of the upwards visitation trend from the past decade. It is anticipated that the interior of the proposed excess structures would continue to be inaccessible to visitors, largely due to the deteriorated condition of many of the structures. As the structures have continued to deteriorate over time, entrance to many is now not safe. Park resources are focused on attempting to control nuisance species such as rodents, and human safety such as repairing broken locks and trying to keep people out of the deteriorated structures. Without direct action, the buildings will continue to deteriorate and the risk to visitor and staff safety will increase. The cost to maintain and manage the structures will continue to increase and consume more park resources. Eventually, the most unstable structures will collapse; should this occur while someone is within or near the structures it could result in severe injury or loss of life. Overall, the trend for visitor use and experience is that more people will visit the park annually over time, and that they will experience some structures that are deteriorating and collapsing in the long term.

Environmental Consequences

Alternative A: No Action

Under alternative A, visitors would continue to be able to view and experience the proposed excess historic structures from the exterior, particularly in Thurmond. The length of time the structures would remain without intervention is unknown due to a wide variety of factors including existing condition and natural events such as rainfall and storms. Structures that are stable and maintained by the NPS such as the Dun Glen Ark (which is still actively used) and Mini Ark are expected to remain standing for the foreseeable future. Structures already in poor condition such as many of the unoccupied houses in Thurmond are expected to continue to deteriorate and likely collapse over time. There would be a gradual change in the visitors' ability to experience the historic nature of the structures already in poor condition as they deteriorate over time. As the buildings continue to deteriorate, visitors would experience views of increasingly degraded and ruined structures that would no longer be representative of what they once were and the historic setting of which they were once part. Fencing and signage would likely need to be added to prevent visitors from entering unsafe conditions and to prevent vandalism. This fencing and signage would detract from the visitor experience in parts of the project area, particularly in Thurmond, because it would be a contemporary visual intrusion that would not be compatible with the historic landscape. Under alternative A, there would also be safety risks to visitors that may be trespassing on the unsafe structures. Hazardous materials such as asbestos-containing materials and lead-based paint are known to occur within many of the proposed excess historic structures; the slow and uncontrolled deterioration of those structures may result in these hazardous materials being released into the environment in visitor use areas. Ultimately, alternative A would result in the slow but eventual loss of many structures due to decay, which would diminish the visitor experience of these historic locations.

Alternative B: Demolish All Proposed Excess Historic Structures

Under alternative B, the demolition of proposed historic structures would adversely impact the experience of some visitors who enjoy the historic and storytelling value of the structures, such as those associated with the whitewater rafting industry in Dun Glen and the railroad worker houses in Thurmond. However, many

structures are not currently interpreted including the Prince Brothers General Store, the Dun Glen Building/Ranger Station, and the Dun Glen Ark, Mini Ark, and Boat Storage Rack; therefore, the demolition of these buildings would not result in the loss of a current interpretive experience for visitors. For other visitors, however, demolishing the dilapidated structures in parts of the project area such as Thurmond would have a beneficial impact on their general experience from a scenic viewshed perspective. For these visitors, the ability to walk around Thurmond, including along the road up the hillside, and see fewer structures in disrepair would result in a more natural experience. Implementation of alternative B would also remove hazardous structures from the park that pose a health and safety risk to visitors if they trespass on to the property. The demolition of proposed excess historic structures under alternative B would be conducted in a controlled manner and all hazardous materials would be disposed properly, which would remove an existing health and safety risk to visitors.

In the short term, demolition (e.g., use of heavy machinery, presence of work crews) would temporarily increase noise within the vicinity of visitors at project locations. Similarly, visitors would see demolition equipment when in the vicinity, which would temporarily alter visitors' views and detract from the natural and/or historic settings of the project areas. These impacts would be temporary and only last the duration of demolition and revegetation activities, which is expected to be approximately six months. Permanent noise levels would be similar to current conditions and would not add to baseline conditions.

Because demolition activities would be timed to avoid roosting seasons for sensitive species, the majority of the deconstruction work would occur at non-peak park usage times. While visitors may experience higher than normal traffic and may experience some short delays to accommodate demolition vehicles, it is not expected that these impacts would noticeably reduce visitor use or experience of the park as a whole.

Alternative C: Retain or Lease Proposed Excess Historic Structures with High Potential for Reuse

Impacts under alternative C would be similar to those described under alternative B, but alternative C would have the additional benefit of retaining at least three and up to six of the proposed excess structures. Under alternative C, the Ice House and Marilyn Brown House in Thurmond would be retained for reuse, including potential interpretive uses; therefore, alternative C would allow potential new visitor opportunities that would not be possible under alternative B. Further, alternative C could also retain the Tom Kelly House in Thurmond if the NPS receives a viable lease proposal. If this home is retained, it would provide another visual example of similar existing homes in the area. In Dun Glen, retaining the Dun Glen Ark would retain a physical representation of the history of whitewater rafting industry along the New River, as described under the impact topic of Historic Structures above. This may have a beneficial impact on the experience of visitors looking to understand the historic rafting industry as it could provide an interpretive opportunity that is not currently available. Further, alternative C could also retain the Dun Glen Mini Ark and Dun Glen Boat Storage Rack if the NPS receives a viable lease proposal. If retained for reuse through leasing, these two structures could provide additional context to convey the history of the whitewater rafting industry along the New River. All other impacts would be the same as under alternative B.

Cumulative Impacts

Other past, present, and reasonably foreseeable actions that may affect visitor use and experience include the preservation of structures within the Thurmond Historic District; the project to address deferred

maintenance of key cultural resources and failing infrastructure systems to include but not limited to wastewater, water, drainage, and electrical systems; and the demolition of non-historic proposed excess structures. These projects would contribute a beneficial increment to the cumulative impact on visitor use and experience by providing improved visitor facilities throughout the park and stabilizing historic structures that are key to interpreting the history of the park, particularly in Thurmond. Demolishing proposed excess non-historic structures would remove safety hazards of deteriorating structures that do not meaningfully contribute to the visitor experience of the park.

Under alternative A, the continuation of current management of the proposed excess structures would result in the continued deterioration of structures within view of visitors that are not actively maintained by the NPS. Due to the subjective nature of visitor experience, this deterioration of historic structures could contribute either an adverse or beneficial increment to the overall cumulative impact. For some visitors, viewing the historic structures despite their deteriorated condition enhances their experience as they can continue to see the physical representation of history; however, other visitors experience adverse visual and potential safety impacts because the deteriorated structures detract from what they expect from either a natural or historic setting. This would be a continuation of the current environmental trend for visitor use and experience, which anticipates deterioration of some historic structures over time without substantial human intervention. Therefore, alternative A would contribute to but would not appreciably change the level of adverse impacts already occurring. Taking into consideration the beneficial increment of other past, present, and reasonably foreseeable actions described above, there would be an overall loss of historic structures that convey portions of the park's history in the long term, but there would be an overall improvement to visitor service facilities throughout the park.

Under alternative B, the active removal of proposed excess historic structures would result in the immediate loss of structures that convey portions of the park's history as part of the visitor experience. Similar to alternative A, this loss could contribute either an adverse or beneficial increment to the overall cumulative impact depending on the viewpoint of the visitor. Visitors who appreciated the physical representation of history would consider this loss an adverse increment while visitors seeking a more natural setting may view the loss as a beneficial increment to the cumulative impact. This would be an acceleration of the current environmental trend for visitor use and experience, which anticipates deterioration of some historic structures over time without substantial human intervention. Taking into consideration the beneficial increment of other past, present, and reasonably foreseeable actions described above, alternative B would result in an overall loss of historic structures that were once part of the historic viewshed experienced by visitors as well as the overall improvement to visitor service facilities throughout the park. Additionally, alternative B would allow park resources currently used to manage and maintain the proposed excess structures to be reallocated to preserve, protect, and enhance other important resources within the park.

Alternative C would contribute a similar adverse or beneficial increment (depending on the visitors' viewpoints) as would alternative B but would be to a slightly lesser degree because at least three and up to six fewer historic structures would be demolished. All other cumulative impacts would be the same as under alternative B.

In conclusion, alternatives A, B, and C would each contribute an adverse or possibly beneficial increment to the cumulative impact due to the loss of historic structures, depending on the individual viewpoint of the visitor. Alternative A would result in a slow loss over time while alternatives B and C would result in

a faster loss (with a somewhat lessened degree of impact under alternative C). When combined with the beneficial increment of the other past, present, and reasonably foreseeable actions, the overall cumulative impact of any alternative could be either adverse or beneficial due to the loss of these historic structures. Though the cumulative impact could be adverse to some visitors, many historic structures (such as the Thurmond Depot and Commercial Row) would be preserved and rehabilitated in order to continue to convey the history of the park in specific locations such as Thurmond. The overall trend of increasing visitation at the park is not anticipated to change as a result of alternative A, B, or C.

CHAPTER 4: CONSULTATION AND COORDINATION

The NPS places a high priority on public involvement in the NEPA process and on giving the public an opportunity to comment on the proposed action. The NPS also conducted consultation and coordination with federal, state, and local agencies, and American Indian tribes to refine the alternatives and identify issues and/or concerns related to environmental impact topics. This section provides a summary of the public involvement, and agency consultation and coordination that occurred during planning.

PUBLIC INVOLVEMENT

The NPS conducted a civic engagement process holding a 30-day public comment period from December 13, 2023, through January 15, 2024. As part of this process, the NPS issued a news release on December 13, 2023, notifying the public about the project, the comment period, and a public meeting. During this comment period, the NPS shared information about the purpose of and need for the project as well as the potential options and issues. NPS then held a public open house at the park on January 11, 2024, to provide information about the project and solicit public comment. Approximately 200 individuals attended the meeting. NPS received a total of 187 comments during the public comment period, covering a range of topics including expressing support for the project, expressing opposition to the project, suggesting other means of dealing with the proposed excess structures such as sale or lease, and suggesting ways for the structures to be repaired and rehabilitated.

Taking into consideration the public comment received during the civic engagement period, the NPS released for public review and comment the *Proposed Demolition of Historic Structures Environmental Assessment and Draft Programmatic Agreement* (draft EA/PA) on October 7, 2024, which analyzed three alternatives, including an alternative to retain up to three proposed excess historic structures. The NPS issued a news release on October 7, 2024, notifying the public about the release of the draft EA/PA, the comment period, and a public meeting. The comment period was open for 33 days, through November 8, 2024. The park held a public meeting in Oak Hill, WV on October 22, 2024. Thirty-seven individuals attended the meeting. During the draft EA/PA review period, the NPS received 245 pieces of correspondence from the public and other interested parties. As a result of those comments, the NPS revised alternative C to include the potential for retaining up to three additional historic structures if viable leasing proposals are received, as discussed in this revised EA. More information regarding public comments received and the associated NPS responses is available in Attachment A of the Finding of No Significant Impact for this project, released in conjunction with this revised EA.

TRIBAL COORDINATION

During the planning and compliance processes under NEPA and NHPA Section 106 for this project, the NPS held monthly video-conference calls and shared consultation materials with the following culturally affiliated tribal nations:

- Absentee-Shawnee Tribe of Indians
- Catawba Indian Nation
- Cayuga Nation
- Cherokee Nation
- Delaware Nation

- Delaware Tribe of Indians
- Eastern Band of Cherokee Indians
- Monacan Indian Nation
- Oneida Indian Nation
- Onieda Nation
- Onondaga Nation
- Seneca Nation of Indians
- Seneca Cayuga Nation
- Shawnee Tribe
- St. Regis Mohawk Tribe
- Tonawanda Seneca Nation
- Tuscarora Nation
- United Keetoowah Band of Cherokee Indians in Oklahoma

AGENCY COORDINATION

Section 7 of the Endangered Species Act

To comply with Section 7 of the Endangered Species Act, the NPS conducted a rare species survey and a bat survey in 2023 within the project areas to determine the presence of special status species. As a follow-up to the bat survey, a DNA analysis of guano samples confirmed that the bats observed in the structures are not federally listed species. The NPS consulted with the US Fish and Wildlife Service (USFWS) in February 2024, and the USFWS concurred with the finding that the project is not likely to adversely affect federally listed bat species on March 15, 2024.

Section 106 of The National Historic Preservation Act

To comply with Section 106 of the NHPA, the NPS initiated consultation with the West Virginia State Historic Preservation Officer (SHPO) and 18 culturally affiliated federally recognized tribes in August 2023 (see list of tribes under Tribal Coordination heading above). NPS also accepted eight additional consulting parties (including two West Virginia state house delegates) to participate in the Section 106 process, listed in table 3 below. The West Virginia SHPO concurred with an initial finding of adverse effect in September 2023 regarding the potential demolition of historic structures.

TABLE 3. ADDITIONAL SECTION 106 CONSULTING PARTIES

Name	Organization
Mark L. Totten, President	C&O Historical Society
Delegate Elliott Pritt	WV House, District 50
Delegate Eric Brooks	WV House, District 45
Dr. Susan Williams, Professor	Marketing and Hospitality, Concord University
Ami Dangerfield, Executive Assistant	Fayette County Historic Landmark Commission
Josh Dragan	Dragan Family
Danielle Parker, President	Preservation Alliance of West Virginia
Melissa McCune	Town of Thurmond

The NPS and the SHPO, in consultation with Tribes and consulting parties listed above, developed a Programmatic Agreement (PA) to govern the consultation process and address any adverse effects from the proposed undertaking. The Advisory Council on Historic Preservation declined their invitation to participate in the Section 106 process. While the PA completes the Section 106 process for this project, the PA spells out how continued consultation with all parties will determine appropriate mitigation for the adverse effect resulting from the selected action. The SHPO concurred with the PA and, as of the date of this Revised EA, is undergoing the signature process. A copy of the PA is available as an attachment to the Finding of No Significant Impact for this project, released in conjunction with this revised EA.

LIST OF PREPARERS

The following team members comprised the interdisciplinary team for the preparation of this document.

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- Bratslavsky Consulting Engineers and Aurora Research Associates, LLC
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2018 Natural Resource Condition Assessment, New River Gorge National River. Natural Resource Report NPS/NERI/NRR–2018/1622.
2015 National Park Service NEPA Handbook.
2013 West Virginia Historic Property Inventory Form for Camp Brookside.
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Proposed Demolition of Historic Structures, New River Gorge National Park and Preserve

- 2011b Foundation Plan for New River Gorge National River.
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- 2002 Cultural Landscapes Inventory, Camp Brookside, New River Gorge National River.
- 2001 Cultural Landscapes Inventory, Thurmond Historic District, New River Gorge National River.

Unrau, Harland

- 1996 Special Historic Study: New River Gorge National River, Oak Hill, West Virginia.

VHB

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

Weldon, Prescott

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

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**APPENDIX A:
SUMMARY TABLE OF
PROPOSED EXCESS HISTORIC STRUCTURES**

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Table A-1. Summary of Proposed Excess Historic Structures

New River Gorge National Park and Preserve
West Virginia

NPS Facilities No.	Structure Name	Area / Location	Alt B - Proposed for Removal	Alt C - Proposed for Removal	National Register Eligibility	Photograph
87692	Charles Ashley Outbuilding	Thurmond	Yes	Yes	Eligible - Contributing Resource to Thurmond Historic District	
87691	Charles Ashley Garage	Thurmond	Yes	Yes	Eligible - Contributing Resource to Thurmond Historic District	
87694	May Bagoski House	Thurmond	Yes	Yes	Listed - Contributing Resource to Thurmond Historic District	
87696	Harold Smith House	Thurmond	Yes	Yes	Listed - Contributing Resource to Thurmond Historic District	
87713	Sidney Allen Ward House	Thurmond	Yes	Yes	Listed - Contributing Resource to Thurmond Historic District	
87698	Wedzel Young House	Thurmond	Yes	Yes	Listed - Contributing Resource to Thurmond Historic District	
99932	Marilyn Brown House	Thurmond	Yes	No	Listed - Contributing Resource to Thurmond Historic District	

Table A-1. Summary of Proposed Excess Historic Structures

New River Gorge National Park and Preserve
West Virginia

NPS Facilities No.	Structure Name	Area / Location	Alt B - Proposed for Removal	Alt C - Proposed for Removal	National Register Eligibility	Photograph
87702	Tom Kelly House	Thurmond	Yes	Potentially, if no viable leasing proposal is received	Listed - Contributing Resource to Thurmond Historic District	
87708	Erskine Pugh Rental House	Thurmond	Yes	Yes	Listed - Contributing Resource to Thurmond Historic District	
97097	James Humphrey Sr. House	Thurmond	Yes	Yes	Listed - Contributing Resource to Thurmond Historic District	
87704	Ice House	Thurmond	Yes	No	Eligible - Contributing Resource to Thurmond Historic District	
87705	McGuffin Garage	Thurmond	Yes	Yes	Eligible - Contributing Resource to Thurmond Historic District	
87711	Phillip A. McClung/ Meadows House	Thurmond	Yes	Yes	Listed - Contributing Resource to Thurmond Historic District	
3361	Dun Glen Building	Dun Glen	Yes	Yes	Listed - Pivotal Resource to Thurmond Historic District	

Table A-1. Summary of Proposed Excess Historic Structures

New River Gorge National Park and Preserve
West Virginia

NPS Facilities No.	Structure Name	Area / Location	Alt B - Proposed for Removal	Alt C - Proposed for Removal	National Register Eligibility	Photograph
3367	Dun Glen Ark	Dun Glen	Yes	No	Eligible	
3369	Dun Glen Boat Storage Rack	Dun Glen	Yes	Potentially, if no viable leasing proposal is received	Eligible	
3368	Dun Glen Mini Ark	Dun Glen	Yes	Potentially, if no viable leasing proposal is received	Eligible	
3290	Prince Brothers General Store	Prince	Yes	Yes	Listed	
87630	Pool Chemical Treatment Building	Camp Brookside	Yes	Yes	Eligible - Contributing Resource to Camp Brookside Historic District	
87590	Vallandigham House (addition Only)	Richmond Bottom / SR26	Yes	Yes	Eligible (note that the addition is not eligible)	

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**APPENDIX B:
STRUCTURE REVIEW SHEETS**

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**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name: 87692 Thurmond Charles Ashley Outbuilding	Date: June 10, 2024
Existing Condition: FMSS listed as Serious	
Concerns/Issues: Small shed of basic wood construction of 64 square feet. The structure is vacant/unused and has only had plants and animals crawling into structure. The location of the structure outside of active visitor area allows site to be vandalized and deterioration continues due to underutilization.	
Stabilization Efforts and Prior Costs: In 2004, the park replaced roof and repainted building. \$3,000 in approximate costs. Operational costs in recent years has been to harden the door with plywood covering to discourage access/vandalism and keeping site relatively clear of plants and rodents.	
Potential for reuse: Structure has very limited potential due to small size and location. No historical significance to structure and does not lend itself to any substantial interpretive reuse, historical leasing or use by maintenance for any operational reasons.	
Benefits from demolition: Retire \$14,903 of deferred maintenance, remove potential vandalism site, lower operational maintenance keep-up costs and would restore natural landscape.	
Photos (Exterior and Interior):	
	

**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name: 87691 Thurmond Charles Ashley Garage	Date: June 10, 2024
Existing Condition: Serious condition in FMSS	
Concerns/Issues: Vacant/unused and unsecured board and batten garage that had garage doors/window pulled off by vandals. Has \$72,654 worth of deferred maintenance and repair required. The lack of garage door/window is a security risk for further vandalism.	
Stabilization Efforts and Prior Costs: In 2004, \$3,300 for new roof and paint was applied to structure followed by additional siding and roof work in 2016.	
Potential for reuse: Structure has very limited potential due to small size and location. No historical significance to structure and does not lend itself to any substantial interpretive reuse, historical leasing or use by maintenance for any operational reasons.	
Benefits from demolition: Retired deferred maintenance and location returns to natural surroundings.	
Photos (Exterior and Interior):	
	

**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name: 87694 Thurmond May Bagoski House	Date: June 10, 2024
Existing Condition: FMSS listed as Serious	
Concerns/Issues: Vacant building is considered “not pivotal or of first importance to the historic district” in historical significance. Structure is perched on steep slope and was internally stabilized and basic exterior rehab performed years ago due to deterioration/time prior to NPS acquisition. Building has no utilities. Asbestos-containing building materials identified in the structure and will require proper removal/remediation. Large porches and walkways are no longer safe and pose hazards to trespassing visitors. Structure continues to face acts of vandalism and deterioration over time and underutilization.	
Stabilization Efforts and Prior Costs: Project 10599B (2006) Replaced the porches \$19,972 Project 98604A (2004) Removed deteriorated porches and installed louvers \$3,000 Project 107063Q (2006) Stabilization \$11,410 Structure was in very serious condition and stabilized with new siding, front porch, doors, exterior painting, roof/gutters and louvered windows.	
Potential for reuse: Low potential for Interpretive or Maintenance reuse. Medium graded potential for historic leasing due to proximity to Commercial Road but would require substantial rehab and utility work for occupancy or operational use. Limited due to structural condition and cost of rehabilitation.	
Benefits from demolition: Serious fall hazards are eliminated and \$355,059 deferred maintenance and repair are retired. Return site to natural surroundings.	
Photos (Exterior and Interior):	
	

**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name:

87696 Thurmond Harold Smith House

Date:

June 10, 2024

Existing Condition:

FMSS listed as Serious

Concerns/Issues:

Vacant building is considered “not pivotal or of first importance to the historic district” in historical significance. Structure is perched on steep slope and was internally stabilized and basic exterior rehab performed years ago due to deterioration/time prior to NPS acquisition. Building has no utilities. Structure continues to face acts of vandalism and deterioration over time and underutilization.

Stabilization Efforts and Prior Costs:

Structure was in very serious condition and stabilized in 2006 with internal reframing, new siding, front porch, doors, exterior painting, roof/gutters and louvered windows.

Potential for reuse:

Low potential for Interpretive or Maintenance reuse. Medium graded potential for historic leasing due to proximity to Commercial Road but would require substantial rehab and utility work for occupancy.

Benefits from demolition:

Retire \$216,913 of deferred maintenance and eliminate future operations and maintenance costs.

Photos (Exterior and Interior):

**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name: 87713 Thurmond Sidney Allen Ward House	Date: June 10, 2024
Existing Condition: FMSS listed as Serious	
Concerns/Issues: Vacant building is considered “not pivotal or of first importance to the historic district” in historical significance. Structure is perched on steep slope and was internally stabilized and exterior rehab years ago due to deterioration/time prior to NPS acquisition. Asbestos-containing materials identified in the structure and will require proper removal/remediation. Building has no utilities. Structure continues to face acts of vandalism and deterioration over time and underutilization.	
Stabilization Efforts and Prior Costs: Project# 98604A \$3,000 Removed/rebuilt rotted porches Project# 89407A \$3,000 Stabilization and fresh paint Project# 107063A \$458 For gutters and downspouts Structure was in very serious condition and stabilized with new siding, front porch, doors, exterior painting, roof/gutters and louvered windows.	
Potential for reuse: Low potential for Interpretive or Maintenance reuse. Medium graded potential for historic leasing due to proximity to Commercial Road but would require substantial rehab and utility work for occupancy or operational use.	
Benefits from demolition: Retire \$242,154 deferred maintenance and repairs and return location to natural vegetative landscape.	
Photos (Exterior and Interior):	
	

New River Gorge National Park and Preserve

Proposed Demolition of Historic Structures

Structure Review Sheet

Site/Structure Name: 87698 Thurmond Wedzel Young House	Date: June 10, 2024
Existing Condition: FMSS listed as Serious	
Concerns/Issues: Vacant building is considered “not pivotal or of first importance to the historic district” in historical significance, though it is a contributing resource to the Thurmond Historic District. Structure is perched on steep slope and was internally stabilized and basic exterior rehab performed years ago due to deterioration/time prior to NPS acquisition. Building has no utilities. Asbestos-containing materials identified in the structure and will require proper removal/remediation. Structure continues to face acts of vandalism and deterioration over time and underutilization. Porches are in extremely poor condition and building poses safety hazard to visitors and staff.	
Stabilization Efforts and Prior Costs: Project 163587 (2012) Exterior painting \$6,117 Project 10599A (2005) Building stabilization \$23,087 Project 107063A (2004) Gutters and downspouts \$5,499 Structure was in very serious condition and stabilized with new siding, front porch, doors, exterior painting, roof/gutters and louvered windows.	
Potential for reuse: Low potential for Interpretive or Maintenance reuse. Medium graded potential for historic leasing due to proximity to Commercial Road but would require substantial rehab and utility work for occupancy or operational use.	
Benefits from demolition: Retire \$212,831 dollars of deferred maintenance and eliminate future operations and maintenance costs. Return site to natural surroundings.	
Photos (Exterior and Interior):  	

**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name: 99932 Thurmond Marilyn Brown House	Date: June 10, 2024
Existing Condition: FMSS has condition listed as Serious.	
Concerns/Issues: Vacant building is located at western end of Commercial Road (frontage road along tracks which is most heavily visited portion of Thurmond) and in front of larger Fatty Lipcomb House. Seeing potential reuse noted below, it must be stated that house is in serious condition missing floors and interior walls, held together only by internal NPS-installed bracing. Asbestos-containing materials identified in the structure and will require proper removal/remediation. House is currently hazardous for entry due to serious condition. Significant investment required to make house sound, up to code and/or accessible for visitors. Structure continues to face acts of vandalism and deterioration over time and underutilization.	
Stabilization Efforts and Prior Costs: Building was stabilized in 2004 using internal bracing because wood framing at that time was not structurally sound. New metal roof, siding, porch, doors, exterior painting, and louvered windows were installed in early 2000's. No cost estimate/records remain.	
Potential for reuse: Due to location, size/status comparison to Fatty Lipcomb House, and history of house this structure has significant potential for interpretive reuse. Only interpretive opportunities from exterior of house currently without substantial rehab/utility/asbestos abatement work for occupancy.	
Benefits from demolition: Deferred maintenance is retired and no future Operations and Maintenance Cost.	
Photos (Exterior and Interior):	
	

**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name: 87702 Thurmond Tom Kelly House	Date: June 10, 2024
Existing Condition: FMSS listed as Serious	
Concerns/Issues: Vacant building is considered “not pivotal or of first importance to the historic district” in historical significance. Structure is perched on steep slope and was internally stabilized and basic exterior rehab performed years ago due to deterioration/time prior to NPS acquisition. Building has no utilities. Asbestos-containing materials identified in the structure and will require proper removal/remediation. Current deferred maintenance costs exceed current replacement value. NPS has to cross private property to access structure. Structure continues to face acts of vandalism and deterioration over time and underutilization.	
Stabilization Efforts and Prior Costs: Project 10599A (2005) Stabilized with damaged wing replaced in kind, new roof/gutters, fresh paint and new porches. \$23,087 Project 98604A (2004) Replaced windows with louvers, removed vinyl siding and restored historic wood siding.	
Potential for reuse: Very low potential for Interpretive or Maintenance reuse. Medium graded potential for historic leasing due to proximity to Commercial Road but would require MOA with private property landowner, substantial rehab and utility work for occupancy or operational use.	
Benefits from demolition: Deferred maintenance of \$195,624 retired. No future operational costs. Return site to natural surroundings.	
Photos (Exterior and Interior):	
	

**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name:

87708 Thurmond Erskine Pugh Rental House

Date:

June 10, 2024

Existing Condition:

FMSS listed as Serious. Building is in danger of collapse due to storm damage.

Concerns/Issues:

Serious safety hazard due to lack of structural integrity. The steep hillside behind Commercial Row and serious condition of structure proves difficult for maintenance, accessibility for visitors, or viability for historic leasing. Structure continues to face acts of vandalism and deterioration over time and zero utilization.

Stabilization Efforts and Prior Costs:

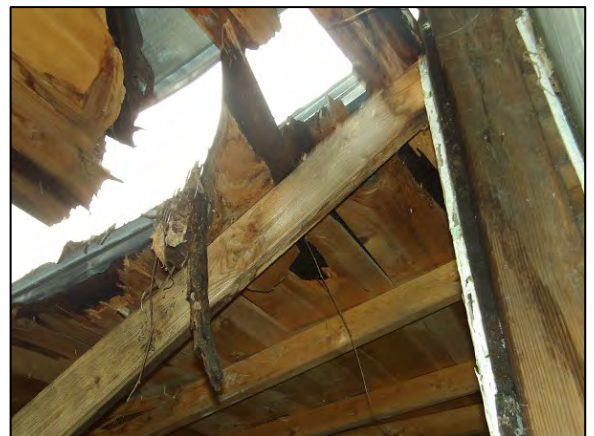
The Erskine Pugh Rental House (built ca. 1900) was scheduled for demolition due to a roof collapse from a fallen tree. The West Virginia SHPO requested the building be stabilized and park shored up the structurally sound portions of the building and rebuilt the unsound portions based on the existing historic fabric with a new roof and gutters. Vegetation was cleared from the immediate area and the exterior was painted. Some damaged stone retaining wall at the base of the building site was repaired. \$30,857 Storm damage occurred again in 2017.

Potential for reuse:

Without significant investment (far exceeding value of structure), the potential reuse for maintenance operations (storage) or interpretive use is very low/none.

Benefits from demolition:

Serious potential safety hazard mitigated. Maintaining original site foundation and historic walls will be easier and pose far less risks when structure is demolished.

Photos (Exterior and Interior):

**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name: 97097 Thurmond James Humphrey Sr. House	Date: June 10, 2024
Existing Condition: FMSS listed as Serious	
Concerns/Issues: Vacant building is considered “not pivotal or of first importance to the historic district” in historical significance. Structure is perched on steep slope and was internally stabilized and basic exterior rehab performed years ago due to deterioration/time prior to NPS acquisition. Building has no utilities. Asbestos-containing materials identified in the structure and will require proper removal/remediation. Structure continues to face acts of vandalism and deterioration over time and underutilization.	
Stabilization Efforts and Prior Costs: Project# 107063A Replaced gutters and downspouts \$5,499 Structure was in very serious condition and stabilized with new siding, front porch, doors, exterior painting, roof/gutters and louvered windows.	
Potential for reuse: Low potential for Interpretive or Maintenance reuse. Medium graded potential for historic leasing due to proximity to Commercial Road but would require substantial rehab and utility work for occupancy or operational use.	
Benefits from demolition: Retire \$266,739 of deferred maintenance and repair, restore steep hillside to natural surroundings.	
Photos (Exterior and Interior):	
	

**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name: 87704 Thurmond Ice House	Date: June 10, 2024
Existing Condition: FMSS listed in Poor condition.	
Concerns/Issues: Current structure is located on CSX property (with a park easement in this location) and houses the drinking water system for the Thurmond Depot Visitor Center. Original exterior is ca. 1940 construction and interior has been repurposed to house the Waterlab/water system for Depot. The water system & equipment is in need of complete overhaul/replacement and new systems would require more space than currently available in Ice House.	
Stabilization Efforts and Prior Costs: The structure originally sat atop a concrete foundation next to current site. The structure was lifted and moved in early 1990's to current site to allow for development of a railroad spur line (which never occurred). The park maintains the interior for safe/healthy running of water system and save for a metal roof, the park has done very little to historic exterior.	
Potential for reuse: Structure could be moved again to true NPS property in Thurmond and used as storage area and/or interpretation of coal mining history. The small structure could also be removed from Thurmond entirely and perhaps donated to outside groups seeking interpretive opportunities possible with this unique structure.	
Benefits from demolition: Building is removed from CSX property, water system volume can be improved in a more appropriate structure and \$6,353 of deferred maintenance is retired.	
Photos (Exterior and Interior):	
	

**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name:

87705 Thurmond McGuffin Garage

Date:

June 10, 2024

Existing Condition:

FMSS listed as Serious

Concerns/Issues:

Vacant corrugated metal clad outbuilding with partial earthen floor. Asbestos-containing materials identified in the structure and will require proper removal/remediation. Structure has remained unused since park acquisition and creates hazard from rodents, snakes, and vandalism.

Stabilization Efforts and Prior Costs:

None

Potential for Reuse:

None

Benefits from demolition:

Hazards are mitigated and surrounding area is returned to native vegetation.

Photos (Exterior and Interior):

**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name: 87711 Thurmond Phillip A McClung/Meadows House	Date: June 10, 2024
Existing Condition: FMSS listed as serious	
Concerns/Issues: Vacant structure was internally stabilized and basic exterior rehab performed years ago due to deterioration/time prior to NPS acquisition. Building has no utilities. Significant water intrusion, structural rot and mold inside structure. Structure continues to face acts of vandalism and deterioration over time and underutilization.	
Stabilization Efforts and Prior Costs: Project 163587A (2012) Painting \$6,117 Project 107063C (2003) New Roof and Stabilization \$13,751 Project 107063N (2005) Exterior Work \$6,027 Structure was in very serious condition and stabilized with new siding, front porch, doors, exterior painting, roof/gutters and louvered windows.	
Potential for reuse: Low potential for Interpretive or Maintenance reuse. Medium graded potential for historic leasing due to proximity to Commercial Road but would require substantial rehab and utility work for occupancy or operational use. Limited due to structural condition and cost of rehabilitation.	
Benefits from demolition: Retire \$417,957 of Deferred Maintenance and eliminate future operations and maintenance costs. Return site to natural surroundings.	
Photos (Exterior and Interior):	
	

**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name: 3361 Dun Glen Building / Ranger Station	Date: June 17, 2024
Existing Condition: FMSS condition listed as Serious.	
Concerns/Issues: This unique structure's exterior walls are the last remaining remnants of the Dun Glen Hotel which was destroyed by fire in 1930. The building's electrical system is not up to code, poses a fire risk hazard and needs complete removal and full rewiring. The moisture issue does not allow for any employee occupation/usage and poses risks to storing materials in the damp environment. Building cannot be occupied without major mold remediation. The building sits along the edge of the 100-year floodplain of the New River. The fire suppression system to this structure needs a general system inspection/rehab for continued operations. Removal of this structure could have definitive impact to the historical district's integrity but there has been ample documentation, archeology and studies of structure and its history to keep the history alive if structure is removed.	
Stabilization Efforts and Prior Costs: In 2012, the park installed a metal roof atop the building. A wing along northern edge of building (former Ranger Station) was removed in early 2000's. The park maintains a fire suppression system in building (and surrounding buildings). The park has replaced windows and exterior doors and done modifications within the interior along with multiple attempts at mold remediation.	
Potential for reuse: Building has been used as a remote office for the Visitor and Resource protection division in the past. It was abandoned because of its remote location. Only potential Maintenance operational reuse would be for more storage but would need mold remediation and electrical system upgrades to use entire building as storage. The building is part of the operational complex of Dun Glen and general concepts have the complex not being part of area readily accessible to visitors. However, this sole building is along public roadway and waysides or other interpretive methods could be used to draw visitors into side parking lot for further understanding of this building/area's history.	
Benefits from demolition: Park would retire \$1.6 million dollars in deferred maintenance and repair. Provide for better space utilization within park's maintenance complex.	

Photos (Exterior and Interior):



**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name:
3367 Dun Glen Ark

Date:
June 17, 2024

Existing Condition:
FMSS has condition listed as serious.

Concerns/Issues:
Large 3,276 square foot building is used only for storage (all of which could be moved to other buildings). Location on floodplain is problematic during high water events and has been flooded in the past which compromises the structural integrity. The large almost all wooden structure is almost fifty years old and would require a significant investment to keep sound, up to code and worth retaining for simple storage. The high visibility/location of the building does require diligent security from threat of vandalism and intrusion.

Stabilization Efforts and Prior Costs:
Park has had to do deep cleans after flooding events. The building has had frequent animal intrusions which park has worked to remedy/fix.

Potential for reuse:
The structure is relatively sound/stable and there is potential for historic leasing (with upgrade to electrical by leasee or park prior to occupancy). The site does allow for ease of access by visitors along with an interpretive opportunity on whitewater history. NPS Maintenance could potentially reuse the structure for storage.

Benefits from demolition:
Large structure removed from viewshed/floodplain to allow for more space to improve day use area. \$571,834 of deferred maintenance retired.

Photos (Exterior and Interior):



**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name:

3369 Dun Glen Boat Storage Rack

Date:

June 17, 2024

Existing Condition:

FMSS condition listed as Serious.

Concerns/Issues:

Unused, fifty-year old boat storage rack could be a hazard to visitors recreating in the area.

Stabilization Efforts and Prior Costs:

No major work has been done on boat rack save minor structural work over years.

Potential for reuse:

Save for potential interpretive reuse to explain whitewater rafting history, there are no other obvious reuses for this structure.

Benefits from demolition:

Structure removed from river corridor/floodplain and the space could be repurposed for improved day use area.

Photos (Exterior only):

New River Gorge National Park and Preserve

Proposed Demolition of Historic Structures

Structure Review Sheet

Site/Structure Name: 3368 Dun Glen Mini Ark	Date: June 17, 2024
Existing Condition: FMSS condition listed as Serious.	
Concerns/Issues: The almost fifty-year old wooden structure has no fire suppression system and an electrical system not up to code and needs complete replacement. The building resides in the floodplain of the New River and has flooded in the past and further flooding could damage structural integrity. The high visibility/location of the building does require diligent security from threat of vandalism and intrusion.	
Stabilization Efforts and Prior Costs: The park cleaned up the structure from previous flood events.	
Potential for reuse: The structure is relatively sound/stable and there is potential for historic leasing (with upgrade to electrical by leasee or park prior to occupancy). The site does allow for ease of access by visitors along with an interpretive opportunity on whitewater history. NPS Maintenance could potentially reuse the structure for storage.	
Benefits from demolition: The park would retire \$285,846 in deferred maintenance and repair costs in addition to removing buildings from the floodplain alongside the river and allow for more available space for improvements to the day use area.	
Photos (Exterior and Interior):	
	

**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name: 3290 Prince Brothers Store	Date: June 17, 2024
Existing Condition: FMSS condition listed as Serious	
Concerns/Issues: The structural integrity of the building has diminished beyond repair. The back wall of the building is severely compromised. The main structure to include the building's roof system is being protected from imploding by a base beam support system on the lower and upper floors. The building's balloon construction technique has resulted in the building bowing out in the center and lean 11 inches from top to bottom. This building technique is ineffective for long-term stability. The original loose stacked rocks used as a makeshift foundation have shifted and deteriorated over the years causing the building to severely sag. The building is located at the base of a steep hillside with drainage issues that have damaged the building's integrity. The building (built ca. 1900) is immediately adjacent to a state highway (see photo below), making visitor and employee use very hazardous for vehicles entering and exiting site as well as pedestrian use around the building. The building has no substantive water or electric utilities. The scope and scale of repairs needed for any occupancy of staff or visitors and the high level of restoration work required and mitigation of safety issues in and around store far exceed the value of the structure.	
Stabilization Efforts and Prior Costs: The balloon construction has pushed the center midline of the exterior walls outwards 11 inches and the structure is listing from left to right. The 1 in 12 pitch roof sheds water from the structure directly down the rear of the building, causing extensive water damage to the framing and exterior components. In 2003, the park invested \$17,600 for the installation of a new single-ply PVC roof membrane and new gutters for the Prince Brothers Store. The roof was in very poor condition and had been leaking into the building causing considerable damage within the interior. After completion of the project, the building remained in poor condition, due to ongoing deterioration of the exterior walls and the listing of the building. In 2005, the park invested \$79,873 for the purpose of repairing, prepping, and painting the exterior wood siding using the historic colors. The park also rehabilitated of the front storefront windows and doors and window rehabilitation including some replacement with wood louvers to provide adequate light and ventilation. In addition, a structural engineer was hired to evaluate the pronounced lean in the two-story structure. As a result, some plywood sheer walls were installed in the attempt to stabilize the building. In 2006, the park invested \$12,287 to complete some additional emergency repairs and improvements to help stabilize the structure. An exterior siding replacement and exterior painting project was completed in 2013 for an additional \$27,500. In 2021, the park discovered the building had deteriorated to such an extent, extreme stabilization measures were taken to build a base beam support system on the lower and upper floors to catch the implosion of the building. Through the years, routine repairs have been made on numerous occasions to try to keep the building intact, but the rapid progressive deterioration has outpaced our efforts.	

Potential for reuse:

There may be very limited opportunity for historic leasing or reuse as an interpretive site for visitors, but all reuse potential is limited due to very high upfront costs needed for any comprehensive repairs and utility/safety upgrades and the physical location/proximity to roadway hazards. Beyond interpretive reuse, the maintenance division would have no need for additional storage and would not seek to have additional operational costs on this structure.

Benefits from demolition:

Roadway hazard mitigated and \$2.6 million dollars in deferred maintenance and repair is retired.

Photos (interior and exterior):

**New River Gorge National Park and Preserve
Proposed Demolition of Historic Structures
Structure Review Sheet**

Site/Structure Name: 87630 Camp Brookside Pool Chemical Treatment Building	Date: June 17, 2024
Existing Condition: Poor, non-functioning. Solid concrete/block building. Swimming pool has been filled in with soil. Roof of structure is flat with access (steps) atop on same level as old pool with railing around site, perhaps a previous patio for pool.	
Concerns/Issues: 320 SF building (built ca. 1950-60) is built adjacent to old pool site and is built directly into hillside beside pool site. The building's interior is filled of old metal pipes and plumbing for the pool's chemical treatment. These pipes and system have been impacted by years of heavy chemical use during pool operations and has now sat idle for decades eroding and corroding and compromising the plumbing's integrity. The structure has no function at the Brookside Education Center in current condition nor in any future planning. The building is solid and made of block and concrete construction but the potential for vandalism or other safety hazard exists as long as building remains. The building is a potential hazard due to biological pests finding ways into structure and the remnants of the pool system has shown no findings in HazMat surveys but will continue to deteriorate over time. The roof of structure poses safety hazards due to ease of access to visitors and potential for failure of guardrails around roof.	
Stabilization Efforts and Prior Costs: During the rehabilitation of Camp Brookside in 2012-2013, no steps were taken to do any rehab at all to this building.	
Potential for reuse: Plumbing and mechanical components could be removed and building rehabbed for potential equipment storage.	
Benefits from demolition: Utilitarian block building is demolished from scenic historic landscape. \$70,975 of deferred maintenance and repair is retired.	

Photos (Exterior and Interior):



**APPENDIX C:
RESOURCES CONSIDERED**

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TABLE C-1. RESOURCES CONSIDERED

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

Resource/Concern and Potential Effects	Recommendation for Further Consideration
Historic Structures Resource Presence: Historic structures are present within the proposed project area. Issue: Demolition of structures and associated infrastructure. Impact: Loss of historic structures. Known Information: A historic resource survey was conducted in 2022 to document the structures proposed for demolition (Bratslavsky et al. 2022). Historic properties within the project area were evaluated using National Register criteria, based on the historic context prepared for the project area. The structures located within the Thurmond Historic District are considered to be contributing resources to that district. Several structures were already listed or determined eligible for listing in the National Register including the Dun Glen Building/Ranger Station, Prince Brothers General Store, and the Camp Brookside Pool Chemical Treatment Building. The Dun Glen Ark, Mini Ark, and Boat Storage Rack are eligible for their association with the statewide whitewater rafting industry. The Vallandigham House is an example of a late-19th century log cabin farmhouse, despite the alterations and rear addition. The remainder of the structures evaluated were found to be not historic or have lost their historic integrity due to poor condition. Structures in the project area have received minimal or no maintenance and rehabilitation and as a result have fallen into a general state of disrepair. Absent extensive investment into the rehabilitation of the structures, it is anticipated that the structures would continue into further disrepair and eventually lose their status as eligible or contributing elements to the historic district. At this time, except as noted, no funding is available to halt or reverse this trend. While the demolition would result in the loss of historic structures, this is consistent with the anticipated trends for these resources.	Additional Surveys or Information to be Developed: Consultation with the State Historic Preservation Office, Tribes, and other interested parties under Section 106 of the National Historic Preservation Act was undertaken to determine the extent of the impacts and if mitigation measures are appropriate. No further information is needed to conduct the impact analysis. Recommendation: NPS carried the impact topic of Historic Structures forward for further consideration and impact analysis. The loss of historic structures would be considered an adverse impact and further analysis was needed to determine if that impact would be significant. Suggested Mitigation: • Foundations of the structures would remain in place where practicable, which could identify the historic location of the lost structures.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
Historic Districts and Cultural Landscapes Resource Presence: The Thurmond Historic District and the Camp Brookside Historic District are present within the proposed project area. Issue: Demolition of contributing resources to the Historic Districts. Impact: Loss of contributing resources. Known Information: The Thurmond Historic District and associated cultural landscape is located along the New River in a remote area in the heart of the New River Gorge. The district is historic for its association with the Chesapeake and Ohio (C&O) Railroad and the coal mining industry during the late 19th and early 20th centuries. Thurmond served as the railroad center on the C&O Railroad transporting coal to and from the coal fields of Southern West Virginia. The Thurmond Historic District was listed in the National Register in 1984; the listing included the entire town on the northwest side of the New River. In 2001, a Cultural Landscape Inventory recommended the boundary of the historic district be expanded to include the Dun Glen area and Southside Junction located on the southern bank of the New River (NPS 2001). Camp Brookside is eligible for listing in the National Register as a historic district and a cultural landscape. The 30-acre camp was designed in 1947 and constructed in 1948 as a recreational summer camp for the children of employees of the Electro Metallurgical Company (NPS 2002). Elchems Metal, as the company was also called, was a division of the Union Carbide Company that produced chemicals in the mid-20th century. The historic districts within the project area have been maintained to the extent possible with available staff and funding levels. Some of the structures within the district have fallen into a state that is beyond repair or rehabilitation. Absent extensive investment into the rehabilitation of these structures, it is anticipated that the structures would continue into further disrepair and eventually lose their status as contributing resources to the historic district. At this time, except as noted, no funding is available to halt or reverse this trend. While the demolition would result in the loss of contributing resources within the historic district, this is consistent with the anticipated trends for these resources.	Additional Surveys or Information to be Developed: Consultation with the State Historic Preservation Office, Tribes, and other interested parties under Section 106 of the National Historic Preservation Act was undertaken to determine the extent of the impacts and if mitigation measures are appropriate. No further information is needed to conduct the impact analysis. Recommendation: NPS carried the impact topic of Historic Districts and Cultural Landscapes forward for further consideration and impact analysis. The loss of contributing resources would be considered an adverse impact and further analysis was needed to determine if that impact would be significant. Suggested Mitigation: • Use of best management practices for demolition and revegetation. • Foundations of the structures would remain in place where practicable, which would identify the historic location of the lost structures.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
Archeological Resources Resource Presence: Archeological resources are present within the vicinity of the proposed project area. Issue: Ground disturbance from demolition activities and equipment staging could compromise archaeological resources. Impact: Archeological resources could be disturbed and potentially lost. Known Information: An archeological survey was conducted in 2023 to identify any archeological sites within the vicinity of the project area and recommend additional testing or avoidance strategies where appropriate (Franz et al. 2023). This survey identified archeological sites within the vicinity of a few of the proposed excess structures proposed for demolition. These sites consisted of pre-contact Native American material culture as well as mid-19th to the early 20th century material culture. The foundation of the former Dun Glen Hotel remains intact underground and includes evidence of the arson fire that destroyed the hotel in 1930. There were no eligible archeological deposits found in the vicinity of the rest of the proposed excess structures, and no additional testing was recommended prior to demolition activities for these structures. Based on the results and recommendations of the survey, known archeological resources can be avoided in locations where demolition activities would take place. Ground disturbance would be limited to previously disturbed areas in the immediate vicinity of the proposed excess structures, and foundations of structures would remain in place where practicable.	Additional Surveys or Information to be Developed: No additional survey or information is required. Recommendation: The NPS considered but dismissed the impact topic of archeological resources from further analysis because it did not meet the conditions listed for retention. Ground disturbance in the location of known archeological resources would be avoided, and an archeological monitor would be present during ground-disturbing activities when appropriate. Therefore, no impacts on archeological resources are anticipated. Suggested Mitigation: • Use of best management practices for demolition and revegetation. • Foundations and retaining walls below ground would be left in place when practicable. • Archeological monitoring would be used during ground-disturbing activities when appropriate. • An Inadvertent Discovery Plan would be in place and implemented in the event that archeological resources are encountered during demolition activities.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
Tribal Ethnographic Resources Resource Presence: Tribal ethnographic resources are potentially present within the proposed project area. Issue: Disturbance to natural and cultural features that comprise tribal ethnographic resources. Impact: Tribal ethnographic resources could be disturbed and potentially lost. Known Information: Early people are known to have inhabited the area that includes the park starting about 10,000 to 15,000 years ago. These people subsisted on hunting, fishing, and gathering nuts, berries, and plants. Agricultural and crop cultivation was introduced to their lifestyle about 6,000 years ago. Eventually, communities and farming villages were developed along major waterways such as the New River. Land use, waterways, plants, and animals native to the park and surrounding area were important parts of the lifeways of indigenous people. The park contains sites, structures, landscapes, and objects including plant and animal resources that are important to the non-recreational uses of culturally affiliated tribal nations. The ethnographic resources of these affiliated tribal nations include religious, subsistence, and ritualized cultural practices, music, and stories about important events in the park. No ethnographic resources of tribal interest were identified within the project area.	Additional Surveys or Information to be Developed: Consultation with culturally affiliated tribal nations was undertaken to identify tribal ethnographic resources within the project area. No further information is needed to conduct the impact analysis. Recommendation: The NPS considered but dismissed the impact topic of tribal ethnographic resources from further analysis because it did not meet the conditions listed for retention. No ethnographic resources were identified within the project area during consultations with culturally affiliated tribal nations. Suggested Mitigation: • Use of best management practices for demolition and revegetation.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
Associated Communities Resource Presence: Residents and community members are present near the project area. Issue: Demolition of structures important to residents of adjacent communities. Noise and visibility of demolition activities near residences. Impact: Loss of community resources. Disturbance to residents during demolition activities. Change in appearance of the project area after project implementation. Known Information: Several structures, including those in Thurmond, Dun Glen, Vallandingham, Prince Brothers General Store, and Camp Brookside, are within close proximity to residential communities. In particular, residents continue to live within Thurmond, adjacent to some of the structures proposed for demolition. Demolition (e.g., use of heavy machinery, presence of work crews) would temporarily increase noise within the vicinity of these adjacent communities. Permanent noise would be similar to current conditions and would not add to baseline conditions. Residences and communities continue to be located adjacent to the project area and are in some instances in close proximity to proposed excess structures proposed for demolition. It is anticipated that these residences and communities would remain for the foreseeable future. Absent extensive investment into the rehabilitation of these structures, it is anticipated that the structures would continue into further disrepair and may pose safety hazards for nearby residents. Additionally, deteriorating structures would continue to attract more nuisance animals such as rodents, which could pose health hazards to nearby residents. Some of the residents may have community or familial ties to the proposed excess structures proposed for demolition. Engagement with the public during the planning process was undertaken understand what the impacts would be on these residents and their community identity.	Additional Surveys or Information to be Developed: Engagement with the public and community members was undertaken to gather additional information on the importance of these structures to their community identity. No further information is needed to conduct the impact analysis. Recommendation: NPS carried the impact topic of Associated Communities forward for further consideration and impact analysis. During civic engagement, area residents and community members expressed concern of the impacts associated with the loss of structures that were part of their community historic identity. Suggested Mitigation: • Demolition activities would be limited to weekday daylight hours. • Implement standard noise abatement measures during demolition. • Use of best management practices for demolition and revegetation.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
Floodplains Resource Presence: The project area resides within the 100 and 500 year floodplain for the New River. Issue: Demolition of structures, exposure of soils during demolition activities and prior to revegetation. Impact: Reduction in potential debris in flooding. Increased erosion/sedimentation during demolition activities. Known Information: This part of West Virginia is susceptible to flooding due to the nature of the topography in the area. The park is situated with the New River and several tributaries running centrally through its boundary. This project would remove structures from the floodplain, reducing the risk of loss of property during a flood event and slightly increasing the capacity of natural floodwater storage. Due to climate trends, extreme weather events, such as the catastrophic flooding event that occurred in 2016, will likely increase in frequency and intensity. Absent extensive investment into the rehabilitation of these structures, it is anticipated that the structures would continue into further disrepair and continue to be at risk of potential loss due to these increased storm events, with an associated risk of potential debris impacts.	Additional Surveys or Information to be Developed: No additional information is required. Recommendation: The NPS considered but dismissed the impact topic of floodplains from further analysis because it did not meet the conditions listed for retention. Demolishing the structures and revegetating the area would have a beneficial impact on floodplains by restoring more natural flooding and drainage patterns and removing the risk of flood damage to the structures. Suggested Mitigation: • Use of best management practices during demolition. • Implementing erosion and sediment control measures during demolition activities such as silt fences, sediment basins, and erosion control blankets.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
Wetlands Resource Presence: Wetlands are present within the vicinity of the project area. Several locations in the project area contain wetlands, including the shoreline of the New River at Thurmond and Dun Glen. Issue: Pollutants entering the wetland due to erosion and runoff. Impact: Rutting and compacting of wetlands from heavy equipment during demolition. Sedimentation entering wetlands. Known Information: Riverine and vegetated wetlands make up small percentages of the park overall. A wetland delineation was completed in 2023 to identify wetlands within the project area and determine the principal functions and values of any newly identified wetlands (VHB 2023). Within the project area, the New River is located within close proximity to several of the structures proposed for demolition, including the Thurmond Ice House and the Dun Glen Ark, Mini Ark, and Boat Storage Rack (VHB 2023). Demolition activities would not take place within any wetlands; however, equipment access may require traveling across known streams and other wetlands. The use of timber matting to limit equipment entering the wetland would minimize any potential impacts during access. Proper erosion and sediment control measures during and after demolition activities would prevent pollutants from entering the wetlands. After demolition, the sites would be restored with native vegetation, and there would be no loss of wetlands or their functions and values. Wetlands throughout the park are currently healthy, and that trend is expected to continue. The project is not expected to alter trends for the currently healthy wetland resources within the park.	Additional Surveys or Information to be Developed: No additional information is required. Recommendation: The NPS considered but dismissed the impact topic of wetlands from further analysis because it did not meet the conditions listed for retention. With the implementation of standard best practices for demolition, impacts to wetlands are expected to be avoided. Suggested Mitigation: • Use of best management practices for demolition. • Clearly marking the boundaries of the wetland on demolition plans and in the field. • Establishing buffer zones around the wetland to prevent direct impact from demolition activities. • Implementing erosion and sediment control measures during demolition and access activities, such as silt fences, sediment basins, and erosion control blankets to prevent sediment from entering the wetlands.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
Water Quality Resource Presence: The New River and several tributaries run through the length of the park. Issue: Non-point source pollution from ground disturbance and equipment use during demolition activities. Impact: Increased non-point source runoff. Known Information: With the New River as the central feature of the park, many of the water quality issues originate outside of the park boundaries. Most of the pollution issues are impairments related to low pH, aluminum, iron, and fecal coliform that are from both permitted and non-permitted sources outside of the park, including wastewater treatment facilities and agriculture. Conditions for water quality for the New River and tributaries are expected to decline due to continued impairment by human sources of pollution (NPS 2018). This project is not expected to alter this trend and is not expected to contribute any non-point source pollution due to the use of best management practices for sediment and erosion control during demolition.	Additional Surveys or Information to be Developed: No additional information is required. Recommendation: The NPS considered but dismissed the impact topic of water quality from further analysis because it did not meet the conditions listed for retention. With the implementation of standard best practices for demolition, impacts to water quality are expected to be avoided. Suggested Mitigation: • Use of best management practices for demolition. • Implementing erosion and sediment control measures during demolition activities such as silt fences, sediment basins, and erosion control blankets.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
Threatened and Endangered Species Resource Presence: There are three federally listed bat species (Indiana bat [<i>Myotis sodalist</i>], northern long-eared bat [<i>Myotis septentrionalis</i>], and Virginia big-eared bat [<i>Corynorhinus townsendii virginianus</i>]) and one proposed species (tri-colored bat [<i>Perimyotis subflavus</i>]) that may occur within the project area. The West Virginia Species of Concern, Allegheny woodrat (<i>Neotoma magister</i>) is known to occur within the project area. A rare plant species survey conducted by the NPS in 2022 and 2023 found no rare plant species within the vicinity of the project area (Manning 2023). Issue: Potential endangered and threatened bat habitat in abandoned structures. Impact: Potential loss of individuals and habitat of abandoned structures. Known Information: The park represents core habitat for the Allegheny woodrat, which inhabits rocky slopes and cliff areas in West Virginia. Allegheny woodrats have been surveyed and monitored in the park since 2001. While they have declined in other parts of their range, the population in the park is stable. Bat assessment surveys conducted in 2023 identified evidence of transient roosting bat presence in three historic structures: the Vallandigham House, McClung/Meadows House, and the Wedzel Young House. No evidence of bat colonies was observed in any of the structures surveyed (Weldon 2023). A DNA analysis was conducted on the guano found during the bat survey, and it was determined that none of the bat species occurring in the building were federally listed species. The USFWS concurred that the project would not adversely affect federally listed species on March 15, 2024. Bat species occurring in the park are threatened by white-nose syndrome, which is a fatal disease in bats caused by the fungus <i>Pseudogymnoascus destructans</i>. The disease was first discovered in New York in the winter of 2006. Since then, it has spread to more than half of the United States, killing millions of bats—up to 99% of some bat colonies. White-nose syndrome was first recorded in the park in 2011, and the decline was most pronounced in <i>Myotis</i> species and the tri-colored bat (NPS 2018). White nose syndrome continues to be a threat for these bat species and that trend is expected to continue. As the proposed excess structures deteriorate over time, they continue to provide potential roosting habitat for the Virginia big-eared bat.	Additional Surveys or Information to be Developed: No additional survey or information is required. Recommendation: The NPS considered but dismissed the impact topic of threatened and endangered species from further analysis because it did not meet the conditions listed for retention. Demolition activities would be scheduled to avoid the sensitive periods for special-status species of bats and the Allegheny woodrat, which would avoid adverse impacts on these species. Suggested Mitigation: • Use of best management practices for demolition and revegetation. • Conduct guano DNA analysis prior to demolition activities to determine the presence of federally listed bat species within the proposed excess structures. • Avoid demolition and any tree removal activities during the roosting period for bat species, April 1 to November 15. • Avoid demolition from May 1 to September 30 to minimize disturbance to Allegheny Woodrats that are known to occupy structures in the project area.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
Migratory Birds Resource Presence: The forests within the vicinity of the project area provide habitat for populations of migratory birds (NPS 2018). Issue: Vegetation clearing for demolition activities. Impact: Loss of migratory bird nests. Known Information: The New River Gorge is globally important in providing critical habitat for neotropical migratory birds, especially wood warblers. Rare species of concern with breeding populations include Swainson's warbler (<i>Limnothlypis swainsonii</i>), golden-winged warbler (<i>Vermivora chrysoptera</i>), Kentucky warbler (<i>Geothlypis formosa</i>), worm-eating warbler (<i>Helminthos vermivorum</i>), wood thrush (<i>Hylocichla mustelina</i>), and Cerulean warbler (<i>Setophaga cerulea</i>) (NPS 2011b). Habitat suitable for protected migratory bird species is likely present within the vicinity of the project area, particularly in forested areas. Forest interior birds, including many neotropical wood warblers are threatened by loss of forest habitat and forest fragmentation, particularly along waterways and in upland forests. Those threats apply at the landscape scale outside of the park; forests within the park are protected and recovering from historical disturbance and fragmentation. Over a 12-year monitoring period (2007 to 2019) for 68 breeding bird species within the park's streamside bird community, populations of 62% of species were stable or increasing, while 38% of species declined (Marshall 2021). This project is not expected to alter this trend. The areas to be disturbed for demolition activities would be relatively small when compared to the overall available habitat within the park. Restoration of the disturbed area with native vegetation after demolition is complete may improve and restore habitat for migratory birds.	Additional Surveys or Information to be Developed: No additional information is required. Recommendation: The NPS considered but dismissed the impact topic of migratory birds from further analysis because it did not meet the conditions listed for retention. Demolition activities would be scheduled to avoid the sensitive nesting period for migratory birds, which would avoid adverse impacts on these species. Suggested Mitigation: • Use of best management practices for demolition and revegetation. • Avoid grubbing and clearing shrubs and other vegetation during the migratory bird nesting season (March through August).

Resource/Concern and Potential Effects	Recommendation for Further Consideration
Vegetation and Wildlife Resource Presence: Vegetation and indicators of wildlife are present within the proposed project area. Issue: Clearing and grubbing from demolition activities. Impact: Loss of native vegetation and wildlife habitat. Known Information: The forests and plant communities in the project area support a diverse community of plant species, diverse breeding bird communities, and a rich assemblage of mammals. Common species within the project area include oaks (<i>Quercus</i> spp.), maples (<i>Acer</i> spp.), tulip-poplar (<i>Liriodendron tulipifera</i>), Red-eyed Vireo (<i>Vireo olivaceus</i>), Scarlet Tanager (<i>Piranga olivacea</i>), white-tailed deer (<i>Odocoileus virginianus</i>), and Virginia opossum (<i>Didelphis virginiana</i>) (NPS 2018). Many of these vegetation and wildlife resources in the park are in a declining trend in condition to some degree due to habitat threats such as forest fragmentation, emerging forest pests and pathogens, and invasive plant species growth; these trends are expected to continue (NPS 2018). This project is not expected to alter the trends related to vegetation and wildlife. Best management practices would minimize impacts on vegetation and wildlife within the project area, and revegetation after demolition activities are complete would provide additional habitat for some species.	Additional Surveys or Information to be Developed: No additional information is required. Recommendation: The NPS considered but dismissed the impact topic of vegetation and wildlife from further analysis because it did not meet the conditions listed for retention. With the implementation of standard best practices for demolition, impacts on vegetation and wildlife are expected to be temporary and minimal. Suggested Mitigation: • Use of best management practices for demolition and revegetation. • Implementing erosion and sediment control measures during demolition activities such as silt fences, sediment basins, and erosion control blankets to prevent pollutants from entering aquatic habitat. • Use the minimum size equipment necessary during demolition activities to minimize the area of disturbance. • Planting of native species once demolition is completed to restore natural conditions.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
Exotic and Invasive Species Resource Presence: Exotic and invasive plant species are present within the proposed project area. Issue: Ground disturbance and equipment used during demolition activities. Impact: Increased the presence and spread of exotic and invasive species. Known Information: The project area has substantial nonnative invasive plant infestations. Invasive plants observed within the project area include (but are not limited to) Japanese knotweed (<i>Polygonum cuspidatum</i>), tree of heaven (<i>Ailanthus altissima</i>), Asiatic bittersweet (<i>Celastrus orbiculatus</i>), Chinese yam (<i>Dioscorea polystachya</i>), multiflora rose (<i>Rosa multiflora</i>), Japanese honeysuckle (<i>Lonicera japonica</i>), and wineberry (<i>Rubus phoenicolasius</i>) (Manning 2023). Invasive species occur most frequently in certain areas of the park including disturbed areas such as recovering mined lands and along the riparian corridor of the New River and its tributaries. These nonnative species compete with native plant species, dramatically change plant communities, and degrade wildlife habitat. Since invasive plants are inherently difficult to control, the management of these species and their effects on park vegetation is challenging. However, as documented in the park's 2020 Invasive Plant Species and Habitat Management Plan, more than half (55%) of the park's forest health monitoring plots contain no invasive plant species, and the park-wide average cover of invasive plants is low (1.8%). Where invasive species do occur in the park, they are slowly spreading, by 0.1% cover per year (NPS 2020). It is anticipated that nonnative invasive plants will continue to pose a threat to natural communities in the project area and this project is not expected to alter this trend. The project area would be revegetated with native species or turfgrass following demolition.	Additional Surveys or Information to be Developed: No additional information is required. Recommendation: The NPS considered but dismissed the impact topic of exotic and invasive species from further analysis because it did not meet the conditions listed for retention. With the implementation of standard best practices for demolition, project-related impacts from exotic and invasive species are expected to be minimized. Suggested Mitigation: • Use of best management practices for demolition and revegetation. • Inspection and cleaning of demolition equipment prior to entering the Park. • Develop and implement an exotic and invasive species management plan during demolition. • Treat invasive species before and after demolition activities to limit continued growth. • Restore all areas disturbed from demolition and structure removal activities with native vegetation.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
Hazardous Materials Resource Presence: Hazardous materials such as asbestos and lead-based paint may be present within the structures to be demolished. Issue: Contractor and NPS staff exposure to hazardous materials. Impact: Contractor and employee exposure to hazardous materials during demolition activities. Known Information: Hazardous materials such as asbestos and lead-based paint may be present in some structures. Demolition activities can disturb these materials and can expose contractors and NPS employees working in the vicinity of the materials. Proper identification, removal, and disposal of these materials is needed to avoid exposure and impacts related to hazardous materials. A pre-demolition hazardous material survey was performed in the project area in September and October of 2023 (Arc Environmental, Inc. 2023). Absent extensive investment into the rehabilitation of these structures, it is anticipated that the structures would continue into further disrepair and hazardous materials such as lead-based paint and asbestos could be released into the environment. Proper removal and disposal of hazardous materials for this project would limit the release of these materials.	Additional Surveys or Information to be Developed: No additional information is required. Recommendation: The NPS considered but dismissed the impact topic of hazardous materials from further analysis because it did not meet the conditions listed for retention. With the implementation of standard best practices for demolition, project-related impacts from removal of hazardous materials are expected to be avoided. Suggested Mitigation: • Use of best management practices for demolition. • Hazardous materials would be addressed in accordance with NPS waste management policies. • Proper removal and disposal of hazardous materials prior to demolition activities. • Asbestos and lead-based paint testing of building materials prior to demolition.

Resource/Concern and Potential Effects	Recommendation for Further Consideration
Air Quality Resource Presence: Air quality is protected and monitored within the Park. Issue: Ground disturbance and equipment use from demolition activities. Impact: Increased pollutant emissions and airborne sediment. Known Information: The project area is not in a non-attainment or maintenance area for any National Ambient Air Quality Standards (NAAQS) pollutants. Demolition activities would require the use of heavy machinery and equipment that would emit air pollutants through exhaust and produce particulate matter (dust). This would temporarily reduce air quality in the immediate area but would not impact air quality long term. While air quality trends in the project area are unknown, conditions for air quality indicators such as ozone and sulfur and nitrogen deposition are of moderate or higher concern (NPS 2018). This project is not expected to alter any trends in air quality and is not expected to contribute a noticeable level of pollution to air quality in the park or vicinity.	Additional Surveys or Information to be Developed: No additional information is required. NEPA Recommendation: The NPS considered but dismissed the impact topic of air quality from further analysis because it did not meet the conditions listed for retention. With the implementation of standard best practices for demolition, project-related impacts to air quality are expected to be avoided. Suggested Mitigation: • Use of best management practices for demolition and revegetation. • Dust control management during demolition activities. • Minimize ground disturbance and the frequency of vehicle traffic during high wind events. • Temporary and permanent stabilization that meets NPS structural engineering and design standards for all disturbed areas during demolition. • Demolition equipment would be well-maintained and use the cleanest fuels possible.

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As the nation's principal conservation agency, the Department of the Interior has responsibilities for most of our nationally owned public lands and natural resources. This includes fostering wise use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historic places, and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people. The department also promotes the goals of the Take Pride in America campaign by encouraging stewardship and citizen responsibility for American Indian reservation communities and for people who live in island territories under US administration.