



United States Department of the Interior
NATIONAL PARK SERVICE



NEW RIVER GORGE NATIONAL RIVER
GAULEY RIVER NATIONAL RECREATION AREA
BLUESTONE NATIONAL SCENIC RIVER
104 Main Street
P.O. Box 246
Glen Jean, West Virginia 25846

IN REPLY REFER TO:

March 23, 2016

1.D.(NERI)

R.J. Scites, P.E.
Director, Engineering Division
WV Division of Highways
1334 Smith Street
Charleston, West Virginia 25301

Re: Thurmond Bridge Project
S310-25/2-0.10
BR-0252(001)D
Fayette County



Dear Mr. Scites:

Thank you for the opportunity to provide comments on the Thurmond Bridge Rehabilitation Environmental Assessment (EA). The Thurmond Bridge is located within the New River Gorge National River, a unit of the National Park Service (NPS). The NPS supports the selection of Alternative 4, which proposes to increase the current load rating for vehicle access and to improve pedestrian access, without additional piers or construction activities within the New River. The NPS has several concerns and suggestions regarding potential impacts to endangered species, water quality, project scheduling, and visitor experience.

Endangered Species

Based on National Park Service data, the Thurmond Bridge is located within 2 miles or less of multiple hibernacula where federally-listed bat species are known to occur, including the Virginia big-eared bat (endangered), Indiana bat (endangered), and northern long-eared bat (threatened). The EA should specify measures that will be taken to determine the use of the bridge by these bat species and what mitigations will be implemented during construction if their presence is confirmed. Consideration should also be given as to whether the project will modify the future use of the bridge by these bat species. The U.S. Fish and Wildlife Service (FWS) letter dated July 17, 2014 (EA Appendix A, Attachment 5), states that the bridge is within known use buffers for the Virginia big-eared bat and Indiana bat. The letter specifies restrictions on when trees can be cleared and that an Indiana Bat Conservation Plan will need to be completed. The letter also states that if a decision is made to list the northern long-eared bat, then potential impacts from the project may need to be addressed (the bat has been listed as threatened). The EA does not address environmental impacts to these listed bat species or the mitigations to be



implemented and it does not make reference to an Indiana Bat Conservation Plan.

In addition, the NPS suggests that if guidance from the following documents is applicable and will be followed during this project, then the documents be referenced in the EA:

- User's Guide for the Range-wide Programmatic Informal Consultation for Indiana Bat and Northern Long-eared Bat, version 2.0, January 2016, by Federal Highway Administration, Federal Railroad Administration, Federal Transit Administration, and U.S. Fish and Wildlife Service (or latest version).
- Range-wide Biological Assessment for Transportation Projects for Indiana Bat and Northern Long-Eared Bat, April 17, 2015, by Federal Highway Administration and Federal Railroad Administration.

Water Quality

The NPS appreciates that the rehabilitation of the Thurmond Bridge will take place without any work in the New River. However, the NPS suggests that the EA be more specific about preventing materials from entering the New River during construction. The EA should state that materials will be contained on the bridge and removed so that the materials do not present a risk of falling into and contaminating the river. Similarly, if project activities such as sand blasting, painting, etc., could generate fine particle dusts or liquid mists, then best management practices should be so that this material is captured rather than becoming fugitive and entering the river. These practices should be specifically stated in the mitigation measures.

Project Scheduling and Impacts to Park Visitors

Park visitors throughout the year are attracted to the many historic structures located within the Thurmond Historic District, including the Thurmond Commercial Row and Thurmond Depot. The Thurmond Depot has been converted into a visitor center, open 10 am to 5 pm daily Memorial Day through Labor Day, and then weekends through October. Year-to-date visitation at the Depot totaled over 7500 visitors in 2015. The summer months are very popular for visitors but in October the fall colors, Railroad Days Festival in Hinton, Fall Excursion train rides, and Bridge Day Festival also attract many visitors. Many visitors come to Thurmond even when the visitor center is closed and use the self-guided walking tour. The NPS provides seasonal housing in Thurmond throughout the year that at times doubles the number of town residents.

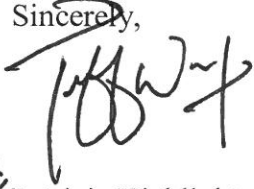
The NPS had suggested adjusting the timing of the proposed rehabilitation efforts to cause the least impact to park visitors and the residents of the town or at least providing for a means of continuous access, perhaps via the railroad side of the bridge in its public scoping comment letter, dated June 6, 2014. The NPS appreciates that the EA specifically commits to scheduling the closures outside summertime to avoid conflicts with the busiest visitation season and events and suggests scheduling the closures outside of October as well to minimize impacts to park visitors.

In addition, the added security measures as mitigation for the temporary bridge closures should specifically include fire and emergency services and should be listed in Table 3.

MAR 23 2016

The NPS would like to continue to be involved throughout the remainder of the planning and implementation of the proposed improvements, including scheduling of the project. Should you have any questions, please do not hesitate to contact me via email at trish_kicklighter@nps.gov, letter, or phone at (304) 465-6511.

Sincerely,



PKR
Patricia Kicklighter
Superintendent

DoByns, Martha Young

From: Mullins, Sondra L <Sondra.L.Mullins@wv.gov>
Sent: Thursday, February 18, 2016 10:58 AM
To: Hark, Ben L; DoByns, Martha Young
Subject: FW: Thurmond Bridge Rehabilitation Project

From: Bailey, Norm - NRCS, Morgantown, WV [mailto:norm.bailey@wv.usda.gov]
Sent: Thursday, February 18, 2016 10:56 AM
To: Mullins, Sondra L <Sondra.L.Mullins@wv.gov>
Subject: Thurmond Bridge Rehabilitation Project

Sondra,

I received your EA on Thurmond Bridge Rehabilitation Project. Thank you for providing us an opportunity to review. Your project will not impact any of NRCS's Conservation Easements or interest.

Just a note for your file, Ron Wigal has retired from NRCS, so you can mail any NEPA type information to me at the same address. Ron Wigal also coordinated the Farmland Policy Protection Act (FPPA) reviews for NEPA compliance. You can send request to Jared Beard at the NRCS State Office in Morgantown. He has taken over the FPPA reviews.

Thanks,

Norm Bailey

USDA Natural Resource Conservation Service
Norm Bailey, Resource Conservationist
State Office-Morgantown
1550 Earl Core Road, Suite 200
Morgantown, WV 26505
304-284-7585
Fax: 304-284-4839
Norm.bailey@wv.usda.gov

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DoByns, Martha Young

From: Mullins, Sondra L <Sondra.L.Mullins@wv.gov>
Sent: Wednesday, March 23, 2016 7:51 AM
To: Hark, Ben L; DoByns, Martha Young
Subject: FW: Thurmond Bridge EA

From: Okorn, Barbara [mailto:Okorn.Barbara@epa.gov]
Sent: Wednesday, March 23, 2016 7:50 AM
To: Mullins, Sondra L
Subject: Thurmond Bridge EA

Ms. Mullins,

Thank you for the opportunity to review the Environmental Assessment (EA) for the Proposed Thurmond Bridge Project located in Fayette County, West Virginia. We understand that the preferred alternative is rehabilitation of the existing bridge and will be implemented without any work in the New River. We suggest that the project team continue coordination the Park Service and other state and federal agencies as the project moves forward.

Please let me know if you have any questions.
Barb

Barbara Okorn
USEPA Region III (3EA30)
1650 Arch Street
Phila, PA 19103
Phone (215) 814-3330



The Culture Center
1900 Kanawha Blvd., E.
Charleston, WV 25305-0300

Randall Reid-Smith, Commissioner

Phone 304.558.0220 • www.wvculture.org
Fax 304.558.2779 • TDD 304.558.3562

EEO/AA Employer

March 11, 2016

Mr. R.J. Scites, P.E.
Director, Engineering Division
West Virginia Division of Highways
1334 Smith Street
Charleston, West Virginia 25301

RE: Comments concerning the Thurmond Bridge Rehabilitation, Environmental Assessment
Thurmond, Fayette County, West Virginia
State Project #: S310-25/2-0.10
Federal Project #: BR-0252(001)D
FR#: 14-776-FA-7

Dear Mr. Scites:

We have reviewed the Environmental Assessment for the Thurmond Bridge Rehabilitation project. As required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR § 800: "Protection of Historic Properties," we submit our comments.

According to submitted information, the West Virginia Division of Highways (DOH) proposes to rehabilitate the Thurmond Bridge, which spans the New River in Fayette County, West Virginia. The scope of work includes stabilization, strengthening, and repair of the bridge. The preferred Renovation Alternative 4 incorporates the addition of refuge bays on the upstream (east) side of the bridge. The refuge bays address pedestrian safety concerns identified by the National Park Service.

We are amendable to the Environmental Assessment as submitted and have no comments concerning additions, corrections, or amendments that should be made to it. In our December 31, 2014 and January 14, 2015 letters to DOH (FR#: 14-776-FA-2 and 14-776-FA-3), we stated our opinion that the proposed project would result in an adverse effect to the Thurmond Historic District as well as the Dunlop Branch Railroad. The structure is also significant under Criterion C due to its unusual combination as a railroad and vehicular bridge. Since that time our office has been in consultation with DOH and other consulting parties to draft, sign, and carry out a Memorandum of Agreement for the proposed project and look forward to continuing this process.

We appreciate the opportunity to be of service. *If you have questions regarding our comments or the Section 106 process, please contact Mitchell K. Schaefer, Structural Historian, at (304) 558-0240.*

Sincerely,

Susan M. Pierce
Deputy State Historic Preservation Officer

SMP/MKS

DoByns, Martha Young

From: Mullins, Sondra L <Sondra.L.Mullins@wv.gov>
Sent: Wednesday, February 24, 2016 3:02 PM
To: DoByns, Martha Young
Subject: FW: S310-25/2-0.10 Environmental Assessment (EA) Thurmond Bridge Rehabilitation Fayette County

From: Wakeford, Anne M
Sent: Wednesday, February 24, 2016 3:01 PM
To: Mullins, Sondra L <Sondra.L.Mullins@wv.gov>
Cc: Bennett, Danny A <Danny.A.Bennett@wv.gov>
Subject: S310-25/2-0.10 Environmental Assessment (EA) Thurmond Bridge Rehabilitation Fayette County

Dear Ms. Mullens,

I have reviewed the EA for the proposed Thurmond Bridge Project.

As long as Best Management Practices are followed and no instream work will be performed, including no discharge into the New River, we have no comment.

Also in future could you only send highways projects to me and to Danny Bennett and not to Roger Anderson. Roger Anderson has retired and Danny Bennett has been promoted to the supervisor for the coordination unit.

Thank you.

Regards,

Anne Wakeford

Anne M. Wakeford

Anne M. Wakeford
Coordination Biologist
WV DNR Elkins Operation Center
PO Box 67 Ward Rd
Elkins WV 26241
Email: Anne.M.Wakeford@wv.gov
Phone 304-637-0245 ex 2035
Fax 304-637-0250

_Title	
FirstName	Brian
LastName	Powell
Organization	
Email	bpowell@bitmapped.net
MailingAddress	3292 University Ave Apt 603
City	Morgantown
State	WV
ZipCode	26505
Comments	<p>I agree with WVDOH's preferred alternative. It reasonably accommodates pedestrians without significantly changing the character of the bridge. I like the idea of the pedestrian overlooks.</p> <p>I would suggest that sidewalks be added on the non-bridge side of CR 25/2 back to its intersection to CR 25, perhaps with an improved staircase to the NPS Dun Glen parking lot.</p> <p>I am unsure if it is feasible, but it would be helpful if the Thurmond end of the bridge could be reconfigured to allow better access to the depot parking lot. The sharp angle sometimes requires backing up to be able to swing the turn without hitting the guardrail.</p>
CommentType	Online

Content Type: Item
 Created at 6/8/2015 2:10 PM by
 Last modified at 6/8/2015 2:10 PM by

_Title	
FirstName	Melissa
LastName	Dragan
Organization	Town of Thurmond
Email	ThurmondWV@gmail.com
MailingAddress	562 River Crest Road
City	Thurmond
State	WV
ZipCode	25936
Comments	<p>As a council member and a citizen of the Town of Thurmond I would like to see Alternative 6 (Repairs & addition of full length sidewalk, downstream side) implemented. It was stressed at the meeting that pedestrian safety was a major concern; therefore Alternative 6 would allow for the most segregation of pedestrians from vehicular traffic. Also, there was discussion about bridge surfaces and "filling a strip of grid for improved pedestrian conditions". Alternative 6 would allow for the pedestrian walking surface to be compliant with ADA and other standards that were discussed. There are also several alternatives that were discussed, with engineers and staff at the meeting, that should be entertained (boardwalk/ tunnel/underpass) as to divert pedestrian traffic on the South side of the bridge from the public parking lot. It was also discussed about possibly working with the Town of Thurmond to cost share on the boardwalk/tunnel/underpass, as they have also been working on this issue.</p> <p>My second choice for implementation would be Alternative 2 (Repairs). Increasing the weight limit on the bridge is not the limiting factor; the current width is the limiting factor.</p> <p>I do not feel that Alternative 4 (Preferred) does anything for pedestrian safety. It actually reduces safety of the pedestrian. The current bridge surface is grated and acts as a deterrent for some pedestrian for various reasons. If "filling a strip of the grid" is completed, it would actually decrease pedestrian safety by increasing the number of pedestrians who will now be interacting with vehicular traffic on the bridge surface. It will also give a false "sidewalk" effect. By "filling a strip of the grid" it will act as a visual sidewalk and when a vehicle goes to pass, pedestrians will feel that they are entitled to the "sidewalk space" and not move over, causing problems. Additionally the "observation bays" could be problematic depending on how they are installed. Think blind spot. A family with a small child who is not paying attention could very easily be severely injured or killed if the railings are solid or create blind spots for the vehicular driver.</p> <p>Everyone was stressing pedestrian safety at the meeting but it is not as though there have been a number of injuries with the bridge in its current state. Thank you for your time and consideration.</p>
CommentType	Online

Content Type: Item
 Created at 6/8/2015 5:43 PM by
 Last modified at 6/8/2015 5:43 PM by

_Title	
FirstName	Patricia
LastName	Kicklighter
Organization	National Park Service
Email	claire_rozdilski@nps.gov
MailingAddress	P.O. Box 246
City	Glen Jean
State	WV
ZipCode	25846
Comments	Hardcopy to follow

R.J. Scites, P.E.
 Director, Engineering Division
 WV Division of Highways
 1334 Smith Street
 Charleston, West Virginia 25301

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Sincerely,

Patricia Kicklighter
Superintendent
New River Gorge National River

CommentType	Online
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Content Type: Item
Created at 3/23/2016 1:30 PM by
Last modified at 3/23/2016 1:30 PM by