

FINDING OF NO SIGNIFICANT IMPACT

Thurmond Bridge Rehabilitation

State Project: S310-25/2-0.10, Federal Project: BR-0252(001)D

Fayette County, West Virginia

Federal Highway Administration



*West Virginia Department of
Transportation*



June 2016

APPROVAL SIGNATURE

THURMOND BRIDGE REHABILITATION

FAYETTE COUNTY, WEST VIRGINIA

STATE PROJECT S310-25/2-0.10 FEDERAL PROJECT No. BR-0252(001)D

FINDING OF NO SIGNIFICANT IMPACT

The Federal Highway Administration (FHWA) has determined that the Proposed Action described in the Environmental Assessment (EA) will have no significant impact on the human or natural environment. This Finding of No Significant Impact (FONSI) is based on the EA and the proposed mitigation which has been independently evaluated by FHWA and determined to adequately and accurately discuss the need, environmental issues, and impact of the proposed project and appropriate mitigation measures. It provides sufficient evidence and analysis for determining that an Environmental Impact Statement is not required.

Submitted by:



For Federal Highway Administration



Date of Approval

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ATTACHMENT A – ENVIRONMENTAL ASSESSMENT, SIGNED FEBRUARY 2016 (INCLUDED ON DISC)

ATTACHMENT B – COMMENTS ON THE FEBRUARY 2016 ENVIRONMENTAL ASSESSMENT

WHAT IS THE PROPOSED ACTION?

The West Virginia Department of Transportation, Division of Highways (WVDOH), in cooperation with the Federal Highway Administration (FHWA), proposes to rehabilitate the Thurmond Bridge, which carries County Route (CR) 25/2 over the New River in Fayette County, West Virginia (Figure 1). This bridge lies within a small but historically significant town, and also within the New River Gorge National River Park.

The Thurmond Bridge was built in 1915-1916. In addition to the roadway, the bridge carries a single track of the Dunloup Branch Railroad, which meets the C & O Railroad in Thurmond on the north side of the river. The roadway component was originally built as a walkway from Thurmond Station, a railroad depot on the north side of the river, to a hotel on the south side. It currently carries a single lane of vehicular traffic. These features are shown in Figure 2.

Constraints of the bridge design also limit the bridge's service to vehicles and pedestrians. Being along a National River and within a historic district, the Thurmond Bridge offers a valuable opportunity for sight-seeing. However, with only an 11-foot width and no shoulder or sidewalk, the bridge cannot safely accommodate vehicles and pedestrians simultaneously.

The purpose of the project is to rehabilitate the Thurmond Bridge to allow it to continue to provide vehicular and pedestrian access to Thurmond, WV and its National Park Service resources and that provides increased safety for pedestrians utilizing the bridge.

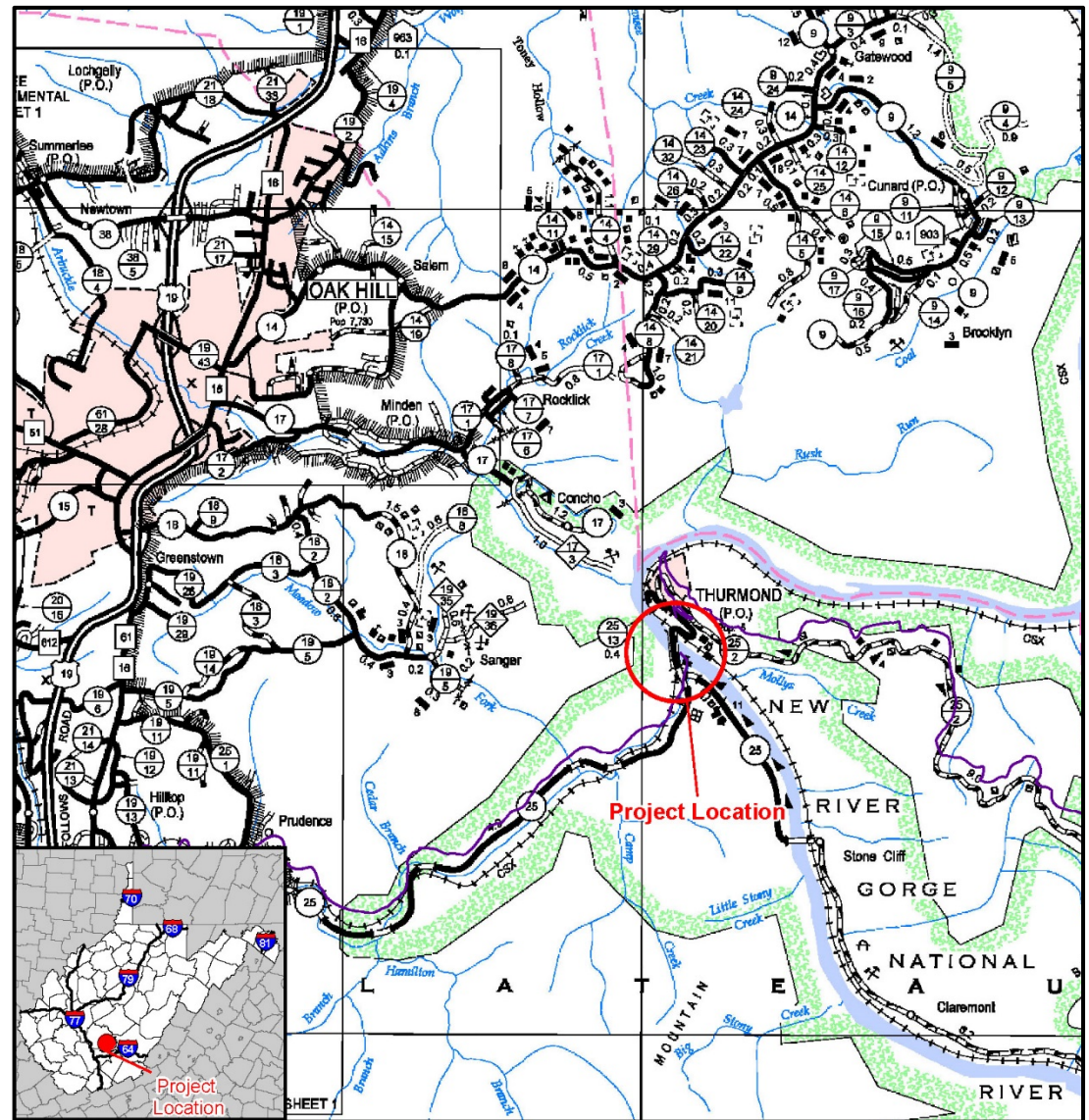


Figure 1. Project Location Map

From a range of alternatives developed for this project, WVDOH and FHWA proposed Renovation Alternative 4 as the Preferred Alternative and presented its associated impacts and mitigation in an Environmental Assessment, signed in February, 2016. After consideration of comments received on the project (discussed later in this document), FHWA has selected Preferred Alternative 4, as it best maintains the historic integrity of the bridge while remaining a feasible alternative that fulfills the purpose and need of the project.

Selected Alternative 4 will rehabilitate the bridge to allow it to remain open and increase its weight capacity. The rehabilitation will not add travel lanes but will provide observation bays adjacent to the roadway at periodic intervals and will provide a paved strip along the roadway to better facilitate pedestrian traffic (Figure 3).

WHAT HAS BEEN DONE SINCE THE ENVIRONMENTAL ASSESSMENT WAS PUBLISHED?

Final Section 4(f) Finding: Under Section 4(f) of the Department of Transportation Act of 1966 (49 USC Section 303 and 23 CFR Part 774), FHWA may not approve the use of land from a publicly-owned public park unless a determination is made that (1) there is no feasible and prudent alternative to the use of land from the property; and (ii) the action includes all possible planning to minimize harm to the property resulting from such use.

In 1983, FHWA issued the “Programmatic Section 4(f) Evaluation and Approval for FHWA Projects that Necessitate the Use of Historic Bridges,” which can be applied to projects when certain criteria are met. As documented in the EA (Attachment A), FHWA made the determination that the Thurmond Bridge Rehabilitation Project meets the conditions required for this Programmatic Evaluation and Approval. No comments were received on this determination. No further analysis or coordination is required for meeting Section 4(f) requirements.

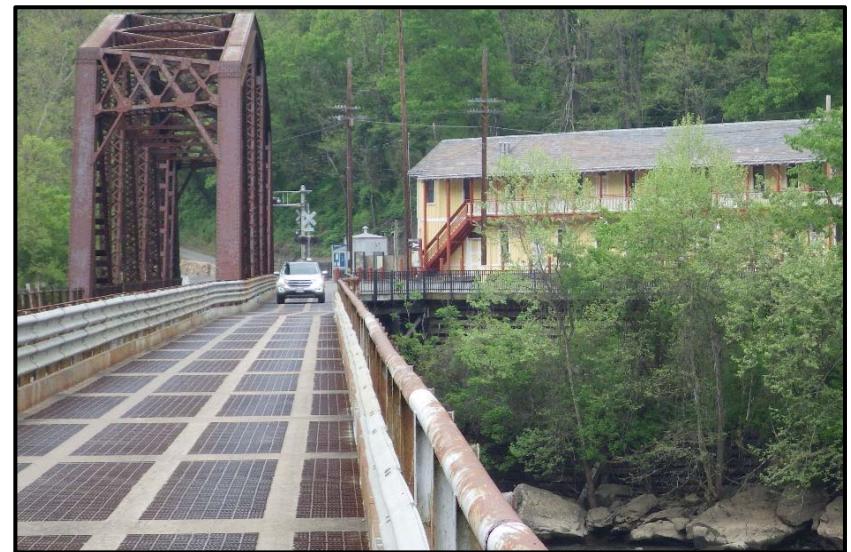


Figure 2. Thurmond Bridge. Top: View from the town of Thurmond of the bridge (right) and the depot (left), now used as an Interpretive Center by the National Park Service. Bottom: A pedestrian’s view north along the bridge with oncoming car.



Figure 3. Selected Alternative (Renovation Alternative 4). This figure shows a computer generated depiction of the proposed renovation, including pedestrian refuge bays and concrete-filled strip of the roadway (by Michael Baker International for WVDOH).

- The requirement that Contractors follow best management practices to limit fugitive dust and liquids and to limit debris from falling into the river (see Table 1: Construction Impacts).

The EA was signed February 4, 2016 and is included in its entirety as Appendix A (on disc at the back of this document).

ARE THERE CHANGES TO THE EA?

Although the agency consultation letter was included in an appendix, the EA did not summarize coordination with the U.S. Fish and Wildlife Service (USFWS) for requirements of Section 7 of the Endangered Species Act; therefore, the following statement is provided here:

- In a letter to WVDOH dated July 17, 2014, the USFWS stated that two federally listed species may be affected by the construction and operation of the proposed project: Indiana bat (*Myotis sodalis*) and Virginia big-eared bat (*Corynorhinus townsendii virginianus*). The letter also stated that the northern long-eared bat (*Myotis septentrionalis*) should be considered if it were to be listed, which it has. The letter indicated measures that must take place if any tree-clearing was proposed. The proposed project does not include any tree clearing; therefore, no further action is required.

The following additions to the list of mitigation measures should be considered in addition to the EA. A complete revised list of measures is provided in Table 1.

- Specific mention of providing fire and emergency services during closure times (see Table 1: SocioEconomic).
- The month of October is an additional time when bridge closures will be avoided to the extent possible and practicable (see Table 1: Parks and Recreation).

WHAT ARE THE COMMITMENTS TO MITIGATE FOR IMPACTS?

Table 1 presents the mitigation measures that will be incorporated to the project to reduce adverse effects of the Selected Alternative.

Table 1. Updated List of Mitigation Measures for the Selected Alternative

Mitigation Category	Impact	Mitigation Commitment	Timing/Phase that Mitigation will be Implemented
Transportation Resources	Temporary closure of bridge.	Temporary closures will be limited to a 3-month period and to a total of 27 days. Closures will not last more than 3 days at a time.	Rehabilitation
SocioEconomic	Temporary closure of bridge.	See item #1 for limitations placed on closure times. WVDOH will provide the option for residents to stay at a hotel during closures and will provide added security, including fire and emergency services, to the town while residents are gone.	Rehabilitation
Parks and Recreation	Temporary closure of bridge.	See item #1 for limitations placed on closure times. To the extent possible and practicable, the closures will take place outside summertime and the month of October to avoid conflicts with the busiest visitation season and events.	Rehabilitation
Visual Resources/ Aesthetics	Slight changes to view of the bridge.	Design of the new refuge bays, the most prominent new feature within view, has carefully considered aesthetics and been coordinated with the SHPO. See also Mitigation Item 5.	Final design
Historic Resources	Changes to the Thurmond Bridge will affect the bridge itself and views of the bridge from the adjacent areas of the Thurmond Historic District and the Dunloup Branch Railroad.	<p>In July of 2015, WVDOH presented a draft Memorandum of Agreement (MOA) to the SHPO to formalize commitments to mitigate the adverse effects to historic resources. The Town of Thurmond, the National Park Service, and FHWA are also signatories to the agreement. A final version of the MOA was executed on February 4, 2016 and is included as Appendix C. The MOA sets forth the following commitments, which will minimize adverse effects:</p> <p>1) Thurmond Bridge will be documented in its present historic setting. The documentation package will include 5"x7" black and white digital prints in accordance with the National Register of Historic Places and National Historic Landmarks Survey Photo Policy Expansion of May 2013.</p> <p>2) The rehabilitation of the bridge is part of the mitigation to save this historic structure. Refuge bays are being added for the safety of the public. Plans have been submitted to the SHPO and have been approved.</p>	Prior to, during, and after rehabilitation

Mitigation Category	Impact	Mitigation Commitment	Timing/Phase that Mitigation will be Implemented
		3) 500 color brochures of the Thurmond Bridge will be developed by WVDOH and distributed to the National Park Service and the Town of Thurmond. A CD containing the brochure will also be given to the groups to print brochures when the original total has been exhausted. The SHPO will be given the opportunity to review all materials developed for this stipulation. 4) The Thurmond Bridge will be featured on a future website listing historic bridges under rehabilitated bridges.	
Construction Impacts	Temporary air, noise and vibration effects that could disturb residents or wildlife.	Contractors will avoid disturbing nesting birds to the extent practicable. Best management practices (BMPs) in keeping with industry standards that are prudent and feasible will be required of the Contractor to: <ul style="list-style-type: none"> • reduce the amount of noise and vibration; • limit fugitive dust and liquids; and • prevent debris from falling into the river. Pollution control measures will be included with the project in accordance with the WVDOT's Standard Specifications for Road and Bridge Construction.	Rehabilitation

WHAT WERE THE COMMENTS RECEIVED ON THE EA?

Throughout the public comment period, which ended on March 30, 2015, the WVDOH received eight (8) comment submissions as letters or online comments:

- Five (5) letter submissions were received from the following five (5) resource agencies: United States Environmental Protection Agency (EPA), the West Virginia Division of Natural Resources (WVDNR), United States Department of the Interior National Park Service (NPS), United States Department of Agriculture Natural Resource Conservation Service (NRCS), and the West Virginia State Historic Preservation Office (SHPO); and
- Two (2) online comment submissions were received from the public and a third online comment was received from the NPS reiterating their letter submission.

The comment letters are included in their entirety in Attachment B. Substantial comments along with responses to those comments are included in Table 2 (agency comments) and Table 3 (public comments).

Table 2. Substantial Comments from Resource Agencies on the Environmental Assessment and WVDOH Responses

Agency – Comment No.	Comment	WVDOH Response
NPS - 1	<p>“Endangered Species</p> <p>“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.</p>	<p>Consultation with regard to the Indiana bat and Virginia big-eared bat was completed with the letter from the U.S. Fish and Wildlife Service dated July 17, 2014 and included with the EA. As noted by the commenter, USFWS stated that a Conservation Plan would be required if any tree clearing was proposed. No tree clearing is proposed; therefore, no Conservation Plan is needed.</p> <p>The bridge itself lacks suitable habitat because the railroad side is coated with creosote and the roadway side is made of metal grating.</p> <p>Specifically with regard to the northern long-eared bat (NLEB), the project is “excepted from incidental take prohibition,” in accordance with the Final 4(d) Rule (78 FR 1900, dated January 14, 2016).</p>
NPS - 2	<p>Water Quality</p> <p>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</p>	<p>The mitigation measures will include the following commitment: Best Management Practices in keeping industry standards that are prudent and feasible will be required of the Contractors to limit fugitive dust and liquids and to prevent debris from falling into the river. This measure is listed in the updated table of mitigation measures (Table 1 of this FONSI document).</p>

Agency – Comment No.	Comment	WVDOH Response
	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.	
NPS - 3	<p>Project Scheduling and Impacts to Park Visitors</p> <p>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.</p> <p>...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.</p>	October has been added to the list of times when bridge closure will be avoided to the extent possible and practicable.
NPS - 4	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.	The SocioEconomic mitigation measures now specifically mention fire and emergency services (Table 1).
NRCS – 1	“Your project will not impact any of NRCS’s Conservation Easements or interest.”	Comment noted.
USEPA – 1	“We suggest that the project team continue coordination the Park Service and other state and federal agencies as the project moves forward.”	Coordination with agencies, such as the National Park Service, will continue as necessary.

Agency – Comment No.	Comment	WVDOH Response
SHPO – 1	“We are amendable to the Environmental Assessment as submitted and have no comments concerning additions, corrections, or amendments that should be made to it.”	Comment noted.
WVDNR – 1	“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. “	Comment noted.

Note: Complete comments can be found in Attachment B.

Table 3. Substantial Comments from the Public on the Environmental Assessment and WVDOH Responses

Last Name – Comment No.	Topic	Comment	WVDOH Response
Powell - 1	Preferred Alternative	I agree with the WVDOH’s preferred alternative. It reasonably accommodates pedestrians without significantly changing the character of the bridge. I like the idea of the pedestrian overlooks.	Comment noted.
Powell – 2	Pedestrian Access & Safety	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.	The suggested improvement is noted but is outside the scope of this project.
Powell - 3	Pedestrian Access & Safety	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.	The suggested improvement is noted, but is not part of the Selected Alternative. Disturbance inside the historic district property is being avoided.
Dragan - 1	Preferred Alternative	“As a council member and a citizen of the Town of Thurmond I would like to see Alternative 6 (Repairs &	Comment noted.

		addition of full length sidewalk, downstream side) implemented.	
Dragan - 2	Pedestrian Access & Safety	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.	Alternative 6 is not a feasible alternative because WVDOH does not have control over the railroad side of the bridge. It was considered and discussed with the railroad; therefore, it was included in the alternatives analysis. However, it was found not to be a viable alternative. Additionally, Alternative 6 requires that pedestrians cross the roadway and railroad to access the interpretive center and its parking area, which decreases the degree of safety improvement.
Dragan - 3	Preferred Alternative	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.	Comment noted. Selected Alternative 4 will provide all the repairs that Alternative 2 does, while also providing places along the extensive bridge length for pedestrians to stop out of the way of vehicles.

<p>Dragan - 4</p>	<p>Pedestrian Safety</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.”</p>	<p>For the following reasons, the added features of Selected Alternative 4 are considered preferable to Alternative 2 (repairs alone):</p> <ul style="list-style-type: none"> • The NPS wants to encourage more pedestrians as well as bicyclists to use the bridge. Therefore, offering a space without the grating was considered more desirable. • Signage will be considered for informing pedestrians and bicyclists that the roadway is shared and that observation bays are available. • The railings will not be solid. • With the sound of wheels on the metal grating and the slow speed limit, pedestrians will have ample warning that a vehicle is approaching. • The NPS anticipates increased use of the bridge.
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Note: Complete comments can be found in Attachment B.

ATTACHMENT A – ENVIRONMENTAL ASSESSMENT, SIGNED FEBRUARY 4, 2016

ATTACHMENT B – COMMENTS ON THE FEBRUARY 2016 ENVIRONMENTAL ASSESSMENT