



United States Department of the Interior

NATIONAL PARK SERVICE
Fredericksburg and Spotsylvania
National Military Park
120 Chatham Lane
Fredericksburg, Virginia 22405



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September 24, 2021

Memorandum

To: All Interested Parties and Members of the Public

From: Manager of Easements, Fredericksburg and Spotsylvania National Military Park

Noel Harrison

Subject: Invitation to Review and Comment, George Washington's Boyhood Home National Historic Landmark ("Ferry Farm"), Landscape Rehabilitation, Phase 1-B

Comment via contact-information given below requested by close-of-business Wednesday, October 27, 2021.

Phase 1-B Proposal Summary

The National Park Service (NPS) invites review of and comment on its proposed finding of No Adverse Effect for, and thus its proposed approval of, the plans of the George Washington Foundation (Foundation) to implement at George Washington's Boyhood Home National Historic Landmark (Ferry Farm), Stafford County, Virginia, a Phase 1-B of the Preferred Alternative of the Site Treatment Plan and planned landscape rehabilitation, selected through an Environmental Assessment following public/agency/consulting-parties review by NPS in 2013-2014. Phase 1-B would entail construction by the Foundation of two buildings that represent, in the Washington Home Farm Interpretive Landscape and during the Washington-family period of ownership, in the eighteenth century, (a) a quarter that was home to the enslaved residents of the property, and (b) a storage building.

For proposal-particulars supplemental to those discussed below, see attached: site-photographs and maps, including of Area of Potential Effect; elevations and plans for proposed quarter; archeological and historical documentation for proposed quarter; elevations and plans for proposed storage-building; archeological and historical documentation for proposed storage-building.

Relation of Phase 1-B Proposal to NPS Conservation Easement, 2000; NPS NEPA Review, 2013-2014; NPS NHPA Review of Phase 1-A Proposal, 2015; Secretary of Interior's Guidelines for Rehabilitating Cultural Landscapes

The NPS on behalf of the United States of America holds as grantee and administers a conservation easement dated June 16, 2000, over the 76 acres of Ferry Farm, with the Foundation grantor of the easement as well as owner of the property. Education, historical interpretation, and other visitor-service operations at Ferry Farm are accomplished by the Foundation as the property's owner and manager. The easement stipulates that NPS will review for consideration of approval "all construction and development plans" prepared by the Foundation for Ferry Farm.

In 2014, NPS signed a Finding of No Significant Impact (FONSI) and selected a Preferred Alternative (Alternative D) at the close of an Environmental Assessment for the Foundation's proposed Site Treatment Plan for Ferry Farm and after conducting in 2013-2014 a National Environmental Policy Act (NEPA) review among consulting parties; local governments; other agencies; and the public. The preamble of the Ferry Farm conservation easement acknowledges and describes the goal "...to restore and perpetuate the historic scene," among the easement's purposes. The FONSI of 2014 describes the Preferred Alternative of the Site Treatment Plan as "a rehabilitated landscape" that will include new buildings for visitor reception and education, maintenance, utilities; access-infrastructure such as walkways and a road; and a "Washington Home Farm Interpretive Landscape" containing new "features including fences, paths, crops, yards, and structures to demonstrate the 18th century plantation setting as authentically as possible." Those new, interpretive structures for the 18th century setting, the FONSI continues, will include buildings that "capitalize on and communicate what is known- -the location and nature of the main residence and the inclusion of outbuildings where their location and function have been determined."

Although the FONSI of 2014 had under NEPA selected and conveyed NPS approval for a Preferred Alternative and its concept of a landscape rehabilitation of Ferry Farm, the FONSI was not the culmination of a National Historic Preservation Act (NHPA) review as well. So in 2015, NPS conducted an NHPA review, likewise among consulting parties; local governments, other agencies; and the public, of its proposed finding of No Adverse Effect for the Foundation's plans to implement a Phase 1-A of the Preferred Alternative, and utilizing detailed historical and archeological evidence assembled by the Foundation. The NHPA review evaluated a planned Washington House interpretive building and other interpretive structures within the Preferred Alternative's Washington Home Farm Interpretive Landscape, and—outside that landscape but also within the 76-acre, easement-covered property—support buildings; a realigned access-road; walks; utilities; and other education and visitor-accommodation infrastructure. NPS formalized its No Adverse Effect finding for and approval of Phase 1-A of the Preferred Alternative and the landscape rehabilitation at the conclusion of the NHPA review in 2015. The Foundation subsequently constructed the Phase 1-A buildings and other features.

The NEPA review of 2013-2014 had included among the Preferred Alternative's landscape-rehabilitation goals that of interpreting "the role of slavery" and constructing a building or buildings interpreting those that had been home to the enslaved residents of the property during the eighteenth century. The NPS's NHPA review of 2015 the Foundation's Phase 1-A plans (and NPS's proposed No Adverse Effect finding/approval of those) noted that, for a future NPS NHPA review, the Foundation planned to propose structures representing, in Ferry Farm's Washington Home Interpretive Landscape and during the Washington family ownership-period of Ferry Farm's history, (a) a quarter occupied by the enslaved residents of the property, and (b) a storage building. Now, in 2021, NPS conducts an NHPA review and invites comment on its proposed finding of No Adverse Effect, and thus proposed approval of, the Foundation's specific plans to construct those two buildings, and the accompanying historical- and archeological documentation and evidence.

The rehabilitated-landscape concept for Ferry Farm, subject of the NPS's NEPA review and FONSI of 2014 and NHPA review of the Foundation's Phase 1-A plans in 2015 and Phase 1-B plans now, is derived from the Secretary of Interior's Guidelines for Rehabilitating Cultural Landscapes, guidelines that include the concept of replacing missing, interpretively important landscape features "if adequate historical, pictorial, and physical documentation exists so that the feature may be accurately reproduced." For Ferry Farm, the Foundation has long undertaken historical research and documentation through archival and published sources. Likewise the Foundation has undertaken extensive archeological research and investigation, after NPS NHPA review of each such undertaking; the Ferry Farm conservation easement of 2000, citing the 1983 Secretary of the Interior's Standards and Guidelines for Archeological Documentation, stipulates that, if reviewed and approved by NPS, "Archeological documentation may be undertaken as an aid to various treatment activities, including research, interpretation, reconstruction..." with "documentation" defined as including observation "directly, through excavation, or indirectly, through remote sensing."

With the approval (conveyed July 21, 2021) of the Virginia Department of Historic Resources, this NHPA review of the NPS proposed finding for the Foundation's Phase 1-B plans combines the NHPA/Section 106 steps of: Initiation of Consultation; Identification of Historic Properties; and Assessment of Adverse Effects, as per the provision for requesting expedited consultation in 36 CFR 800.3(g), and since the Ferry Farm conservation easement of 2000 limits the time allowed NPS for its response to plans submitted to it by the Foundation.

Particulars of Phase 1-B Proposal (See also attached plans, measured drawings, and summaries of historical and archeological evidence for each planned building.)

The Foundation's plans to implement the Phase 1-B of the Preferred Alternative's landscape rehabilitation consist of constructing the quarter and storage building, noted above, within the Washington Home Farm Interpretive Landscape mapped and otherwise described in the Environmental Assessment of 2013-2014 and FONSI of 2014, and to the following specifics:

- a. an interpretive structure representing and located at the site of a Ferry Farm quarter of the

1725-1775 period. The quarter extant during the eighteenth-century at this location housed enslaved domestic workers. The new, interpretive structure here will encompass a single room with loft and measure 18 ft. 10.5 inches feet (to top of chimney) in height and 10 feet by 14 feet in plan. The structure will rest upon a sandstone rubble foundation- -of the same, buff-colored, Aquia sandstone used for the nearby Washington House interpretive-structure at Ferry Farm—that in turn will rest upon compacted gravel wrapped in landscape fabric. The framed walls will be covered by weatherboards painted Spanish brown. The single chimney of the quarter will have an Aquia sandstone base, and red brick hearth and daub chimney covered by weatherboards. The fireplace will be non-operating. The roof will feature unpainted riven wood clapboards. A loft will be situated above the first floor with a ladder and hatch access. The structure will feature wooden floors and a (sealed) root-cellar hatch (with no root cellar actually present underneath). Installation of the sandstone-rubble foundation and fabric-wrapped, underlying layer of gravel will necessitate, in depth, excavation of up to 12 inches, and will only involve ground-disturbance of preexisting, archaeological-excavation backfill, with no intact archaeological layers or features being disturbed. Installation of the fabric-wrapped, underlying layer of gravel will necessitate excavation, in plan, of an area extending 12 inches on all sides, beyond the 10 feet by 14 feet plan/footprint, and to the same depth and likewise with no intact archaeological layers or features being disturbed. The quarter structure would be situated 100 ft. north of the Washington House interpretive structure constructed following NPS NHPA review and approval of the Phase 1-A plans in 2015, and within the Core Interpretive Landscape identified in the Site Treatment Plan following NPS NEPA review in 2014.

Resource-avoidance and mitigation-planning for the proposed structure representing the quarter: 1) Installation of the foundation elements, including the underlying layer of fabric-wrapped gravel, will not involve ground-disturbance below the archaeological backfill nor disturb any intact archaeological layers or features. 2) Potential effects to archeological resources will be further reduced by the absence of any new utilities or landscape features, or the need to remove extant vegetation. 3) The quarter structure will be situated so that visibility from other locations in the Washington Home Interpretive Landscape and locations of Ferry Farm outside the Interpretive Landscape will be muted by (a) adjacent interpretive structures, especially existing fencing that measures 6 ft. in height, and (b) a low profile (18 feet 10 inches to roof peak, and about 19 feet to top of the chimney). The proposed quarter-structure's location at a distance of 900 feet from the City Dock, on the opposite side of the Rappahannock River in Fredericksburg; behind a steeply-sloped river terrace and clumps of forest cover on the ground intervening on the Ferry Farm side of the river; and partially behind a large, adjacent tree; and the structure's earth-tone coloration (Spanish brown, same as the existing, adjacent Washington House interpretive structure) will conceal most of the quarter as viewed from the Rappahannock River and City Dock. The same characteristics of the proposed quarter, the existing fencing intervening, and a distance of 730 feet will conceal most of the structure as viewed from a gap in the forest cover bordering Virginia Route Three. Existing forest cover will conceal the quarter structure from other areas outside the property/conservation-easement boundary. 4) Operation of heavy equipment during construction would be limited to only improved surfaces or atop heavy construction matting. 5) The ground-disturbing work would be monitored by one of the Foundation's professional archeologists.

b. an interpretive structure representing and located at the site of a Ferry Farm storage building of the 1725-1775 period. The building extant at this location during the eighteenth century was used to store vegetables. The new, interpretive structure here will encompass one room and measure 15 ft. 8 inches (one story) in height and 12 feet by 12 feet in plan. Log planks, unpainted and V-notched at the corners, and daub chinked (clay with a binder), will clad the building on the sides. It will feature a tarred riven-wood clapboard roof, a foundation of buff-colored Aquia sandstone rubble, and at the corners rest upon footers that in turn rest upon layers of gravel wrapped in landscape fabric. The structure will be unpainted. The interpretive storage-building will also feature earthen floors and a root cellar. The root cellar will extend to a depth of 12 inches, in an area excavated during archeological investigation in 2014, and be lined/stabilized with yellow clay with a polymer binder at the pit edges. No fireplace is planned for this building. Installation of the foundation and footers will only involve ground-disturbance of preexisting, archaeological-excavation backfill, with no intact archaeological layers or features being disturbed. Installation of the above will necessitate excavation, in plan, of an area extending 12 inches on all sides, beyond the 12 feet by 12 feet plan/footprint, and to the same depth with no intact archaeological layers or features being disturbed. The storage-building interpretive structure would be situated 65 ft. east of the Washington House interpretive structure constructed following NPS NHPA review and approval of the Phase 1-A plans in 2015, and within the Core Interpretive Landscape identified in the Site Treatment Plan following NPS NEPA review in 2014.

Resource-avoidance and mitigation-planning for the proposed structure representing the storage building: 1) It will be situated so that installation of the foundation elements, including the underlying layer of fabric-wrapped gravel, will not involve ground-disturbance below the archaeological backfill nor disturb any intact archaeological layers or features. 2) The root cellar of the storage building will be situated in an area excavated during archeological investigation in 2014. 3) Potential effects to archeological resources by the storage building will be further reduced by the absence of any new utilities or landscape features, or the need to remove extant vegetation. 4) The storage building will be situated so that its visibility from other locations in the Washington Home Interpretive Landscape and locations at Ferry Farm outside the Interpretive Landscape will be muted by (a) adjacent interpretive structures, especially existing fencing that measures 8 feet in height, and (b) a low profile (about 18 feet to roof peak). The proposed storage building's location at a distance of 618 feet from a gap in the forest cover bordering Virginia Route Three, the presence of the multiple fences intervening, and the structure's earth-tone coloration (unpainted) will conceal most of the storage building as viewed from Virginia Route Three. Existing forest cover and other topography, including a steep slope along the Rappahannock River, will entirely conceal the storage-building from other areas outside the property/conservation-easement boundary, including from the Rappahannock and the City Dock in Fredericksburg, on the opposite side of the river. 5) Operation of heavy equipment during construction would be limited to only improved surfaces or atop heavy construction matting. 6) The ground-disturbing work would be monitored by one of the Foundation's professional archeologists

Precautionary Measures in the Event of Unanticipated Discovery of Gravesites, Human Remains, and/or Funerary Artifacts During Implementation of Phase 1-B

Including through the limitation of ground-disturbing construction activities to only those areas disturbed during earlier, NPS-reviewed archeological investigations; the limitation of operation of any heavy equipment to only improved surfaces or atop heavy construction matting; and monitoring by a professional archeologist on the Foundation's staff, as described above, the Foundation during implementation of Phase 1-B would make all reasonable efforts to avoid disturbing any gravesites, including any containing Native American human remains and associated funerary artifacts. The Foundation would treat any human remains encountered in a manner consistent with the Advisory Council for Historic Preservation's Policy Statement Regarding Treatment of Burial Sites, Human Remains and Funerary Objects (February 23, 2007; <http://www.achp.gov/docs/hrpolicy0207.pdf>).

In the event that gravesites or human remains are encountered, the Foundation would immediately notify the NPS, which shall immediately notify the Virginia Department of Historic Resources and the consulting parties. All work involving subsurface disturbance would be halted in the area of the resource and in the surrounding area where further subsurface materials can reasonably be expected to occur. If the remains are determined to be of Native American origin, the Foundation would comply with the provisions of NAGPRA and the accompanying regulations at 43 CFR Part 10. If the remains are determined not to be of Native American origin, the Foundation would comply with the Virginia Antiquities Act, Section 10.1-2305 of the Code of Virginia, final regulations adopted by the Virginia Board of Historic Resources published in the Virginia Register on September 20, 2016, 17VAC5-and found in the Code of Virginia 10.1-2305 et seq, or subsequent revisions.

Comments by NPS Cultural Resources Subject-Area Specialists Accompanying their No-Adverse-Effect Recommendations for NPS Proposed Response to Foundation's Phase 1-B Plans

Regional Archeologist and Program Manager, NPS Region 1, Northeast Archeological Resources Program:

"This is a ground disturbing activity, however the proposal is in line with the property owners' previous proposal to construct structures for interpretive purposes as part of a landscape rehabilitation within the NHL- -described in their submittals accompanying the NPS's preceding NHPA and NEPA reviews, of 2013-14, and 2015. The current proposal calls for construction within previously excavated areas of the site. Ground disturbances will not occur within any unexcavated areas, or impact any archeological layers or features. The structures will not require new utilities or other landscape features either; ensuring protection and preservation of unexcavated areas in the surrounding vicinity.

"Recommendations: The project should proceed. It may be prudent to include a professional

archeological monitor, either contracted or an archeologist on staff, at least during the major ground disturbing portions of the project, to ensure construction does not inadvertently cause damage to intact portions of the site. The construction crews should be instructed to take great care when using heavy machinery, and only operate such equipment from on top of heavy construction matting or improved areas to ensure inadvertent damage does not occur to the landscape and underlying archeological deposits. Great care should be taken to not operate heavy machinery or park in unimproved areas of the site during periods of heavy rain when the ground is soft, to avoid rutting or other inadvertent damages to the landscape.

Historical Architect, NPS Region 1, Historic Architecture, Conservation, and Engineering Program:

“The product of a long, and clearly deliberative and thoughtful process, the proposed undertaking appears to incorporate interpretive benefits and improvements resulting in no adverse effect on cultural/archaeological resources. Impact on the historic scene and viewshed also appears to have been carefully considered.”

Historical Landscape Architect, NPS Region 1, Resource Planning and Compliance Program:

“This project will have no adverse effect on the historic landscape. The addition of two interpretive structures into the interpretive landscapes are appropriate to convey the working farm setting of Washington's Boyhood Home. The archeological research and documentation provides sufficient evidence that structures of this scale existed during the historical period that is being interpreted.”

Contact for Comment on NPS Proposed Response to 1-B Plans (Receipt Requested by Close-of-Business, Wednesday October 27, 2021)

Comment on the NPS proposed finding of No Adverse Effect for, and thus proposed approval of, the Phase 1-B Ferry Farm landscape-rehabilitation planned and to be implemented by the George Washington Foundation, may be sent to NPS via email (noel_harrison@nps.gov), regular mail at the physical address above, or via the NPS Planning, Environment and Public Comment website (<https://parkplanning.nps.gov/>).

City of Fredericksburg

Stafford County

Rappahannock River

Virginia Rt. 3



Fig. 1. Summary Map: Proposal-Location; NPS-Easement Boundary; and Area of Potential Effect (see separate map for detailed APE), Proposed Landscape Rehabilitation, Phase 1-B, George Washington's Boyhood Home National Historic Landmark ("Ferry Farm")

■ area of proposed project (footprints of 2 proposed interpretive structures and unaffected, open areas and existing interpretive structures adjoining)

□ boundary of NPS-held conservation easement

□ area of potential effect

map scale and orientation

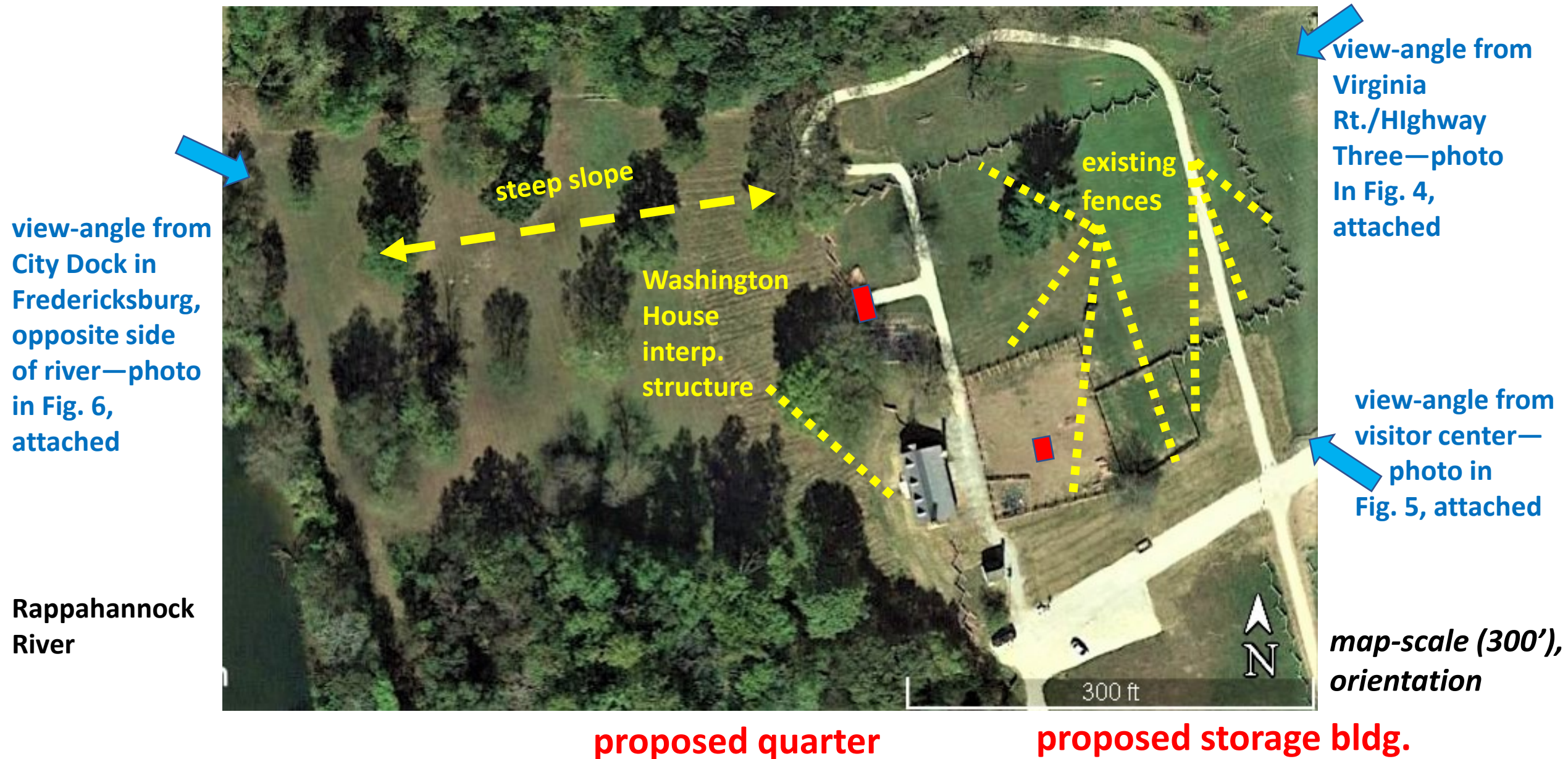


Fig. 2. Site Plan, Proposed Landscape Rehabilitation, Phase 1-B, George Washington's Boyhood Home National Historic Landmark ("Ferry Farm")

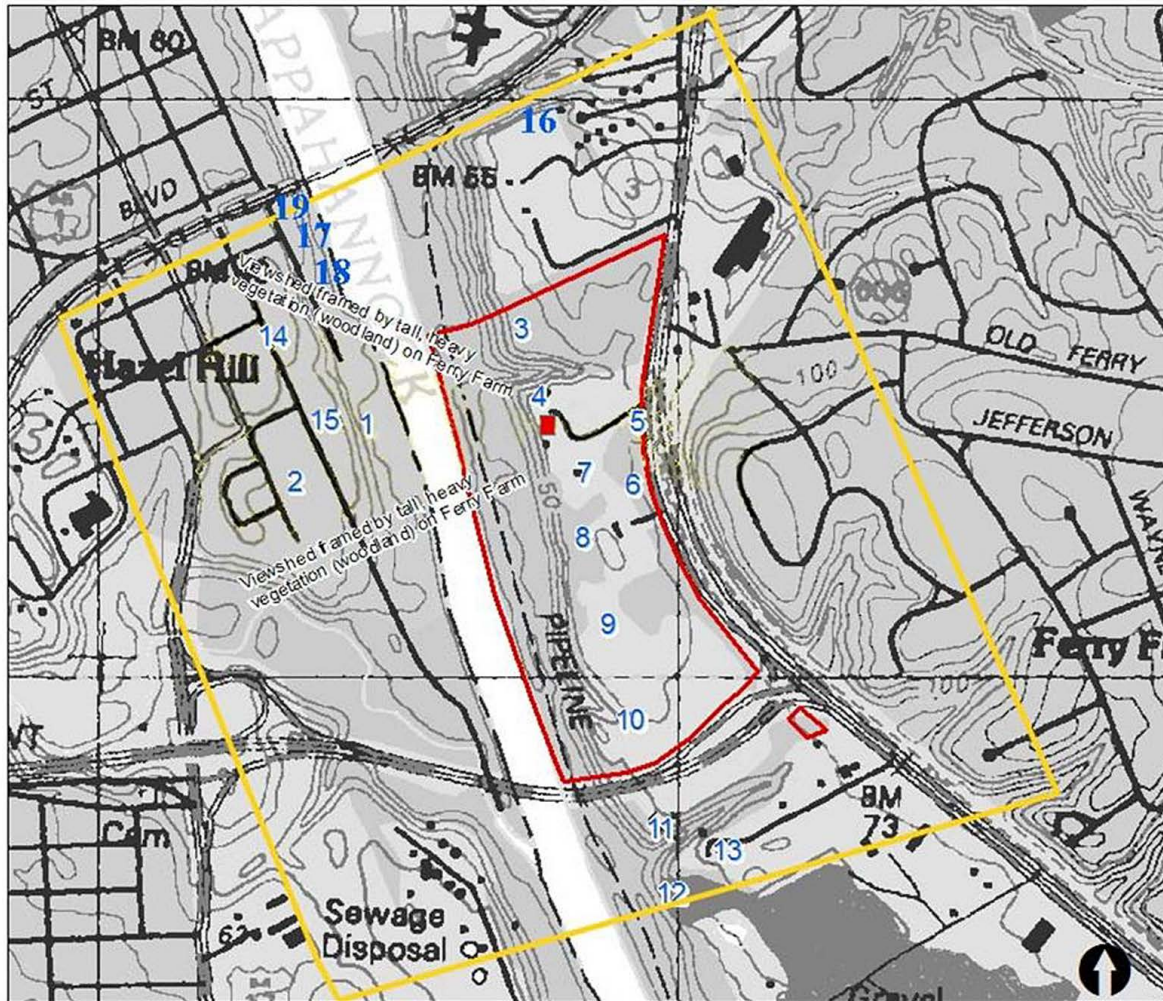


Fig. 3. George Washington's Boyhood Home NHL (red block = project footprint; red line = easement boundary), Landscape Rehabilitation, Phase 1-B: Area of Potential Effect (yellow line)

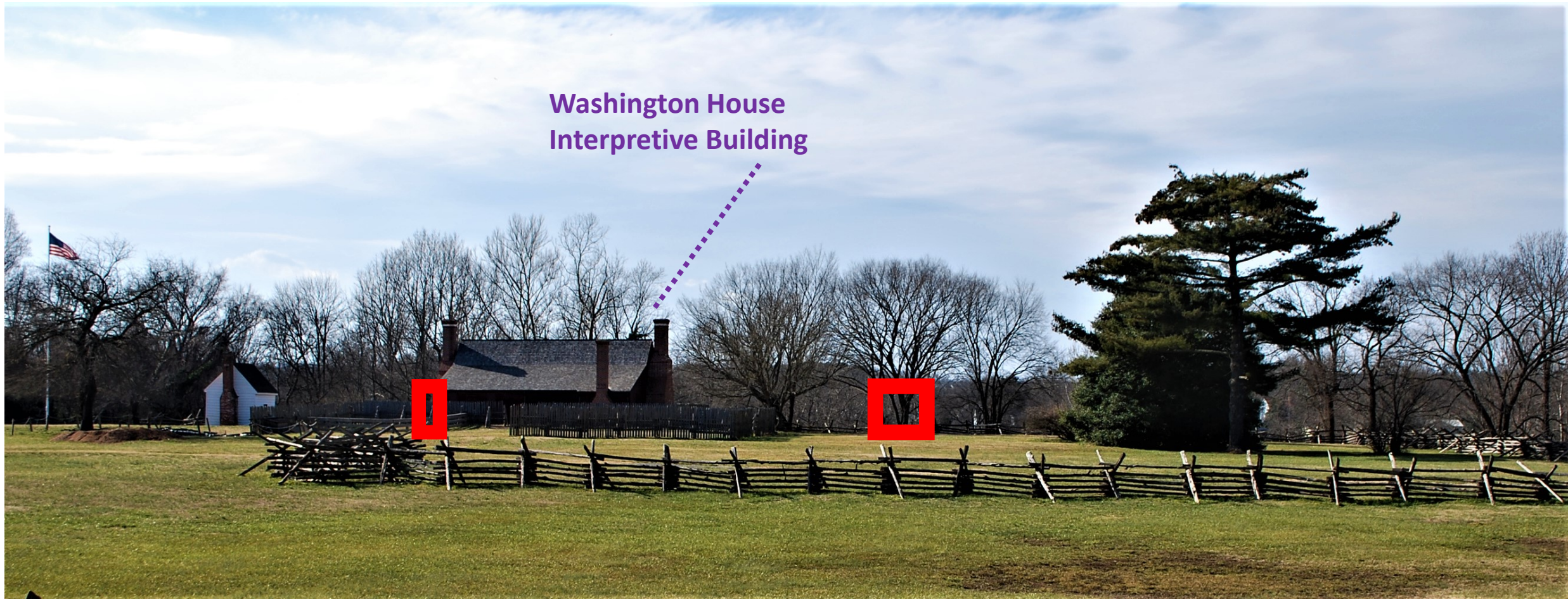
Phase 1-B location Area of Potential Effect 1-19 Cultural, architectural, and archaeological sites

0 0.25 0.5
Miles

Cultural, architectural, and archaeological sites

- | | |
|--|---|
| 1. Ice House; 19th c.; 44SP0613 | 11. Temporary camp; Prehistoric unknown; 44ST0004 |
| 2. Multiple Dwelling; 19th c.; 44SP0327 | 12. No type recorded; Prehistoric unknown; 44ST0005 |
| 3. Single Dwelling; 20th c.; 44ST0490 | 13. Camp; Middle Archaic; 44ST0015 |
| 4. Other, Farmstead, Earthworks; 18th - 20th c.; 44ST0174 | 14. Fredericksburg Historic District; 111-0132 |
| 5. Outbuilding; 19th c.; 44ST0931 | 15. Sentry Box Kitchen; 111-0095 |
| 6. Outbuilding; 18th - 20th c.; 44ST0932 | 16. Late Archaic Site; 44ST0011 |
| 7. Outbuilding; 19th & 20th c.; 44ST0933 | 17. 19th Century Mill; 44SP0188 |
| 8. Temporary camp; Prehistoric unknown; 44ST0172 | 18. Iron Furnace; 44SP0070 |
| 9. Temporary camp, Outbuilding; Prehistoric unknown, 19th c.; 44ST0934 | 19. Bridge; 44SP1087 |
| 10. No type recorded; 19th c.; 44ST0173 | |

**Fig. 4. George Washington's Boyhood Home NHL Proposed Landscape Rehabilitation, Phase I-B:
Project Location, Looking Southwest from Property Entrance-Road and Area of Virginia Route Three**



**Proposed
Storage-Building**

Proposed Quarter

**Fig. 5. George Washington's Boyhood Home NHL Proposed Landscape Rehabilitation, Phase 1-B:
Project Location, Looking Northwest Along Path and from Area of Visitors' Center**



Proposed Quarter

Proposed Storage Building

Proposed Quarter

Washington House interpretive building



Rappahannock River

Fig. 6. George Washington's Boyhood Home NHL Proposed Landscape Rehabilitation, Phase 1-B: Project Area, Looking Southeast from City Dock in Fredericksburg

Fig. 7. Map of Alternative D (Preferred Alternative) from Environmental Assessment of Site Treatment Plan/Landscape Rehabilitation, Subject to NPS and Public-Agency-Consulting-Party Review, 2013-2014, and NPS FONSI in 2014



“Proposed Washington Home Farm Interpretive Landscape” denoted here: location of quarter- and storage-building interp. structures proposed in 2021 for Phase 1-B landscape rehabilitation.

George Washington Boyhood Home Site at Ferry Farm

Figure 8
ALTERNATIVE D

