

National Park Service
U.S. Department of the Interior

Chesapeake and Ohio Canal National Historical Park
Maryland



Relocation of Park Headquarters
Chesapeake & Ohio Canal National Historical Park
(Hagerstown, MD to Williamsport, MD)

Environmental Assessment
July 2019



[PAGE INTENTIONALLY LEFT BLANK]



Table of Contents

PURPOSE AND NEED.....	1
Background And Project Area	1
Issues And Impact Topics Retained For Analysis	2
Issues Dismissed From Further Analysis.....	3
ALTERNATIVES.....	4
No Action Alternative.....	4
Action Alternative: Relocate Park Headquarters To Williamsport (NPS Preferred).....	4
Mitigation Measures	5
AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES	7
Visitor Use And Experience	7
Impacts of Alternative 1 – No Action	7
Impacts of Alternative 2 (NPS Preferred).....	8
Historic Structures	8
Impacts of Alternative 1 – No Action	11
Impacts of Alternative 2 (NPS Preferred).....	12
Archeology.....	14
Impacts of Alternative 1 – No Action	15
Impacts of Alternative 2 (NPS Preferred).....	15
Cultural Landscapes and Historic Districts.....	15
Impacts of Alternative 1 – No Action	16
Impacts of Alternative 2 (NPS Preferred).....	16
Cumulative Impacts	17
Alternative 1 – No Action	18
Alternative 2 (NPS Preferred).....	18
Conclusions.....	18
CONSULTATION AND COORDINATION	20
Agency Scoping	20
Public Scoping	20
REFERENCES	21
FIGURES	
Figure 1. Map of area showing existing conditions.....	2
Figure 2. Configuration of proposed park headquarters and visitor center.....	4
Figure 3. Total visitation for the park from 1951 through 2018.....	8



Figure 4. The Malott House, built between 1865 and 1877.....	9
Figure 5. The Cline House, built circa 1880.....	10
Figure 6. Facing southeast toward the project area. The stone house is seen on the right. The additional frame structures are connected to the left of the stone house. Image from c. 1930.....	11
Figure 7. The composite Miller Lumber structure, including the stone house, frame additions, Planing Mill and lumber storage, and modern steel-frame structure.....	11
Figure 8. Historic structures to be removed outlined in red, with historic structures to be stabilized outlined in green. The project area is outlined with a red dashed line.....	13
Figure 9. Sanborn insurance map from 1929, showing the location of previously demolished structures outlined in red.....	14

TABLES

Table 1. Contributing components of the cultural landscape in the project vicinity.....	16
---	----



PURPOSE AND NEED

The National Park Service (NPS) proposes to relocate its administrative offices (headquarters) from a leased building outside the park in Hagerstown, Maryland to a newly-developed site in Williamsport, Maryland. The project area would also house a new visitor center, moving interpretive operations from the Cushwa Basin into the project area. The project area is directly adjacent to the Cushwa Basin area of the park.

The purpose of this project is to locate NPS staff offices adjacent to the park, consolidate disparate staff offices to improve collaboration among employees, and to enhance the visitor experience in the Williamsport area through the construction of a modern visitor center. This project is needed because 1) the current administrative center of the park is located in Hagerstown, Maryland, approximately 10 miles from the closest area of the park; 2) park staff are located in several, disparate buildings across the park; and 3) the existing lease of the current park headquarters building expires in 2022.

This EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended, and implementing regulations, 40 Code of Federal Regulations (CFR) Parts 1500-1508, NPS Director's Order 12: Conservation Planning, Environmental Impact Analysis, and Decision-making, and the accompanying NEPA Handbook. Compliance with Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, is being conducted concurrently with the NEPA process.

BACKGROUND AND PROJECT AREA

On September 26, 2018, the NPS and Maryland Economic Development Corporation (MEDCO), with support from Washington County, Maryland, entered into a Cooperative Management Agreement (CMA) that identified a property that would house a future visitor center and the park's new headquarters for the Chesapeake & Ohio Canal National Historical Park. Under this agreement, MEDCO would put together a financial package and would build the structure(s) on land owned by Washington County. The CMA allows NPS to make base use payments for the use of the facilities in quarterly installments, which, over the life of the CMA, will equal the annual debt service on the MEDCO financing for construction. NPS would furnish the inside of the building. No NPS-administered properties or resources would be affected by this proposal; however, the site currently includes buildings that contribute to the Williamsport Historic District as described in the National Register of Historic Places (NRHP).

At the expiration of the CMA, the NPS will evaluate whether the facilities and County land directly associated with the visitor center and headquarters could be donated to the NPS. Currently, the C&O Canal headquarters is located in Hagerstown, Maryland, which is a 20-minute drive from the nearest park location in Williamsport. In 2002, the park offices moved to Hagerstown from the Ferry Hill Plantation visitor center near Sharpsburg, Maryland. The current headquarters, leased through the General Services Administration, expires in 2022.

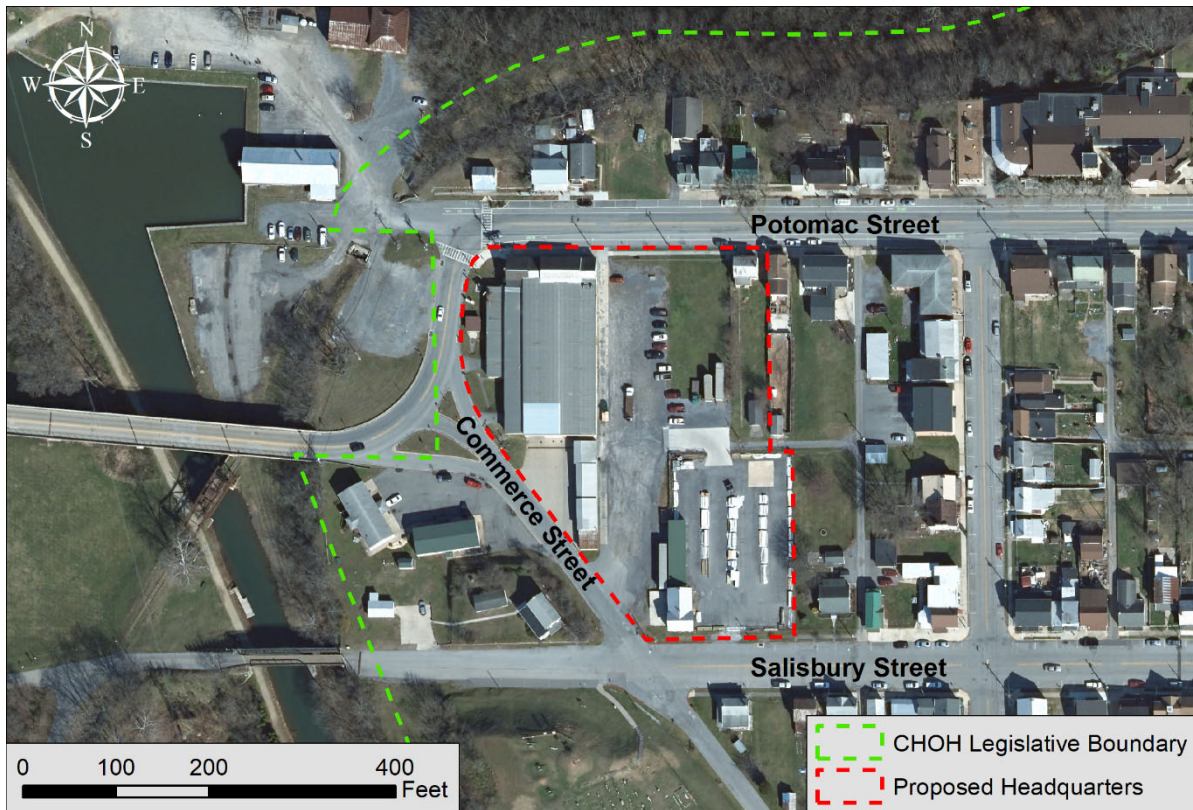


Figure 1. Map of area showing existing conditions

ISSUES AND IMPACT TOPICS RETAINED FOR ANALYSIS

This section describes project issues or concerns identified during scoping that were determined by the project team to warrant a more detailed analysis. Relevant laws and policies are briefly discussed for each issue.

Visitor Use and Experience. The proposed alternative may have the capacity to affect visitor use and experience in the project area and surrounding portions of the park. The proposal would result in a shift of visitor-centered interpretation to the new building within the project area from the current location of the visitor center in the Cushwa Warehouse. Relocation of the visitor center will also modify pedestrian and vehicular circulation in and around the project area and adjacent NPS properties. After development of the site, the town of Williamsport may opt to close North Commerce Street between West Salisbury Street and U.S. Route 11, only permitting vehicular traffic for tenants residing in the apartment complex located across Commerce Street from the project area.

Historic Structures. The project area contains several historic buildings, including the Cline House, Malott House, Planing Mill, Wood Sheds, and the composite Miller Lumber storefront structure that contains a stone house and attached frame structures that front to Potomac Street, all of which contribute to the Williamsport Historic District. The proposed alternative will remove some of these structures and will stabilize others, making them available for adaptive re-use in the future. Impacts to specific structures will be addressed in the analysis.

Archeology. There are known archeological resources associated with multiple stages of human occupation in the project area with the potential for more to be discovered. Prior to European settlement, it is likely that pre-Contact Native Americans traversed the location and may have periodically occupied portions of the land. They were followed by early European explorers and more permanent Colonial-era tenants, eventually leading to the founding of the town of Williamsport. In addition to the extant historic



structures, foundational remains of two demolished buildings and a section of stone wall exist below the ground surface. Sub-surface artifacts were found surrounding the foundations. There is additional potential for archeological deposits to be present beneath portions of the site currently covered by modern concrete slabs which are proposed for demolition. Archeological artifacts discovered during surveys and site development will be catalogued and provided to Washington County as the owner of the property.

Historic Districts and Cultural Landscapes. The project area encompasses portions of the Williamsport Historic District which is listed in the National Register of Historic Places (NRHP). As outlined in consultation with the SHPO, the indirect Area of Potential Effect (APE) encompasses the entire Williamsport Historic District. The orientation and configuration of buildings within the District is an important component of the cultural landscape and the proposed alternative will impact the landscape by removing/adding structures and altering the layout of the site. The project area is also adjacent to and visible from the C&O Canal National Historical Park, additionally listed in the NRHP. The one-mile stretch of the park adjacent to the project area constitutes a significant component landscape of Williamsport, Maryland, and contributes to the significance of the park as a whole.

ISSUES DISMISSED FROM FURTHER ANALYSIS

This section provides brief descriptions of issues and concerns identified during scoping that were determined to not warrant further consideration, as well as a brief justification for the dismissal of each issue.

Museum Collections. The current Visitor's Center does not contain any museum collections; however, the newly constructed Facility may contain museum collections displayed in the exhibit cases. Any collections on display will be properly accessioned and curated, and will be appropriately climate-controlled and protected from UV degradation and/or museum pests. NPS museum staff will be consulted for input during the design process to ensure the structure and specific exhibits will be able to meet NPS standards. The location of the new building is outside of the boundaries of the 100-year floodplain. Impacts to museum resources are negligible or non-existent; therefore, this topic was dismissed from further analysis.

Water Resources. This project will not affect wetlands, surface waters, or aquatic species. The proposed alternatives do not alter the extent of impervious surfaces in the project area, nor do they affect the flow patterns of stormwater leaving the project area. All stormwater regulations will be met and an approved sediment and erosion control plan would be followed during site development, according to state and local requirements. Additionally, the project area is completely outside of the 100-year floodplain. For these reasons, further analysis of potential impacts to water resources was dismissed.



ALTERNATIVES

This EA documents the analysis of environmental consequences of two alternatives: the no-action alternative and the proposed action/preferred alternative. The elements of these alternatives are described in detail herein. Impacts associated with the actions proposed under each alternative are outlined in the “Affected Environment and Environmental Consequences” section of the EA.

NO ACTION ALTERNATIVE

Under the no action alternative, the park’s administrative building would remain outside of the park boundaries in Hagerstown, Maryland through a lease with the General Services Administration (GSA). The current building is leased through 2022, at which time a new lease would have to be negotiated or the park headquarters would require relocation to a different facility. The current building comprises 21,998 square feet. In addition to this building, employees located in other buildings spread throughout the park will remain in those offices. Employees are currently stationed in Sharpsburg and Cumberland, MD, Washington, DC, and in maintenance facilities in southern Williamsport, Oldtown, and Potomac, MD.

ACTION ALTERNATIVE: RELOCATE PARK HEADQUARTERS TO WILLIAMSPORT (NPS PREFERRED)

Under this alternative, the proposed new headquarters and visitor center would be built within the project area and Cooperative Management Area (Figure 2). This alternative will move the current park’s headquarters from Hagerstown, MD and will consolidate disparate staff offices into a single location. This alternative will also shift the interpretive center of the park from the adjacent Cushwa Basin to the project area. The project area is located adjacent to, but outside of the park boundary, near the approximate mid-point of the park. The CMA includes land owned by Washington County and leased to MEDCO for a ground lease of 45 years. Once constructed, all improvements on the site and within the CMA will be operated by MEDCO and the NPS for the life of the CMA. At the expiration of the CMA, the NPS will evaluate whether the facilities and County land directly associated with the visitor center and headquarters could be donated to the NPS.

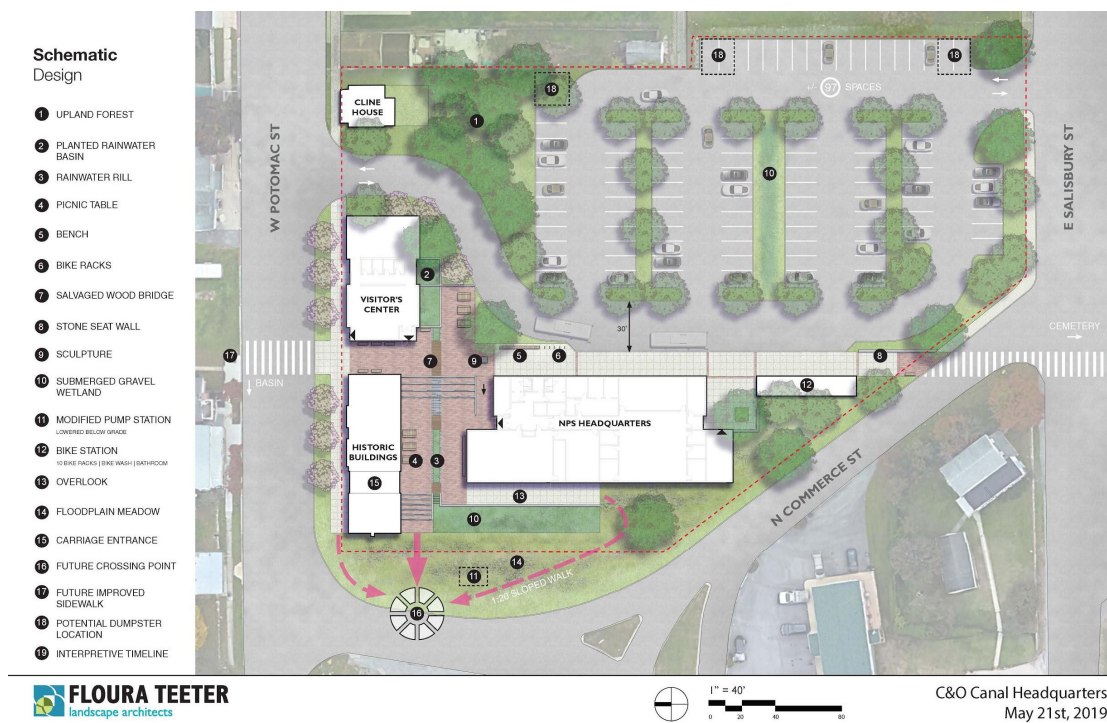


Figure 2. Configuration of proposed park headquarters and visitor center



The new park headquarters will consist of a 2-story administrative building with approximately 20,500 square feet. The building will include office space for interns, seasonal and permanent park staff, and employees of the C&O Canal Trust. Included in the space of the administrative building will be a public meeting space available for use by the public. The building will be situated on the west end of the project area and will run perpendicular to West Potomac Street, evoking the layout of the current Planing Mill. The park will consult with the SHPO regarding an appropriate exterior façade for the buildings that will be consistent with The Secretary of the Interior's Guidelines for the Treatment of Historic Properties and The Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes.

The new visitor center will be a 1-story, approximately 2,500 square-foot building that will face West Potomac Street. This building will be constructed so as to be sympathetic to the character of the Historic District. The visitor center will consist of a front desk and bookstore, a theatre, restrooms, and exhibit space. To facilitate pedestrian traffic from the visitor center and parking area to the park, this alternative will install traffic safety measures, including stop lights and pedestrian crosswalks, across U.S. Route 11. Parking in the project area will consist of approximately 97 spaces, located south of the visitor center and east of the administrative building. A widened entry lane will run along the east side of the administrative building to allow for safe drop-off/pick-up for buses. A bike wash/repair station and restroom will be located south of the headquarters building, and a stone/paved plaza will lie between the historic Potomac Street storefront buildings and the headquarters. Space between the headquarters building and U.S. Route 11 will be used for a visitor overlook, pedestrian access to the park, and for any required stormwater retention.

This alternative includes the removal of the historic Planing Mill, located behind the Potomac Street buildings and aside Route 11 before crossing the Potomac River, as well as a series of Wood Sheds located behind (south of) the modern, metal building. The modern pre-engineered metal structure tied into the Planing Mill and the row of Wood Sheds to the south of the metal building will also be removed. The historic Malott House, facing Salisbury Street, will be removed to facilitate parking and traffic flow in and out of the project area. Non-contributing modern structures, including an open storage shed behind the Malott House and a cinder-block garage structure behind the Cline House, will also be removed. The historic buildings fronting Potomac Street, including the Cline House, the original Miller Lumber storefront buildings, and the stone house, will remain. These buildings will be stabilized through this project for potential, adaptive re-use in the future. The modern pump station to the west of the Planing Mill may be modified, if possible, in order to reduce its visual impact.

Construction of the foundation of the headquarters building and the visitor center will cause ground disturbance within the project area and may remove *in situ*, sub-surface archeological features and artifacts that exist within the footprints of the proposed structures. The placement of the visitor center will also necessitate removal of the stone foundations of two previously demolished structures along Potomac Street. Construction of the visitor center will also remove the remaining stone wall, likely from a garage or outbuilding, from behind these foundations.

Removal of the Planing Mill and Wood Sheds and the addition of the new administrative building will be visibly noticeable from the Cushwa Basin within the park, as will be the stone plaza, visitor overlook, and any stairs or ramps necessary to facilitate pedestrian traffic into the park. From the park, the new visitor center will be partially obscured by the Potomac Street structures, topography, and screening vegetation.

MITIGATION MEASURES

Mitigation, according to NEPA (40 CFR 1508.20) includes the avoidance or minimization of impacts to resources. To minimize impacts related to the proposed alternative, the NPS would implement mitigation measures when and wherever feasible. Subject to the final design and approval of plans by the agencies involved in the CMA, mitigation measures will include, but would not be limited to, the measures listed below:



- The 1,916 archeological artifacts discovered during Phase IA and IB investigations throughout the project area will be catalogued and provided to Washington County as the land owner. The NPS will develop an archeological monitoring plan in consultation with the Maryland Historical Trust and other consulting parties to ensure that any significant archeological deposits under the modern concrete slabs are identified. If significant resources are identified, an appropriate mitigation plan will be prepared and implemented by the NPS.
- NPS will consult with the Maryland Historical Trust regarding an appropriate exterior façade, including design, color, and materials, for the new buildings that will be consistent with The Secretary of the Interior's Guidelines for the Treatment of Historic Properties and The Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes. The exterior of the buildings will be sympathetic to the character of the Williamsport Historic District and will protect viewsheds from the park. The new buildings will be compatible to the historic buildings in scale, material selection, building architecture, and placement on the property.
- The orientation and placement of the administrative building will be consistent with that of the current Planing Mill and wooden shed. The building will additionally block views of the parking lot from the NPS property at the Cushwa Basin.
- The placement of the visitor center will approximate the previously demolished structures that faced Potomac Street. The new visitor center building will maintain the street wall, infilling a gap left by the prior demolition of two houses that faced the street. The new structure will be in character with the Potomac Street context, which is a mix of two-story residential and commercial masonry and wood-frame structures.
- NPS will complete an updated Cultural Landscape Report for the Williamsport sections of the park, including the Cushwa Basin, adjacent to the project area. The CLR will additionally include the full extent of the project area.
- An Historic Structures Report will be completed for the Miller Lumber buildings, which include the Planing Mill and Potomac Street buildings. Historic American Building Survey (HABS) documentation will also be completed for historic buildings to be demolished, including the Malott House and the Planing Mill.
- NPS will compile a collection of oral histories from members of the public with experience and past knowledge of the Miller Lumber site and its history.
- The footprint of the demolished residential structures will be displayed in the visitor center and Plaza floor and paving.
- In consultation with the Maryland Historical Trust, NPS will develop a Building Utilization Plan to identify opportunities for suitable re-use of the Potomac Street buildings.



AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter will describe current environmental conditions in and surrounding the project area. These conditions serve as a baseline for understanding the resources that could be impacted by implementing the project. In addition, this chapter will include an analysis of the environmental consequences of each alternative.

VISITOR USE AND EXPERIENCE

Affected Environment. The project area includes 4.8 acres that encompass former property of the Miller Lumber yard, which operated from around 1890 to 2017. The extant buildings are vacant and the property is owned by Washington County. The Chesapeake & Ohio Canal NHP is directly adjacent to the project area. The park annually hosts millions of visitors, approximately 4.5 million in 2018, who come to enjoy its many natural and cultural resources. The park, paralleling the Potomac River from Washington, D.C., to Cumberland, MD, provides easy access for daily users and overnight campers. Park amenities and facilities include interpretive centers, boat ramps, campgrounds, picnic areas, and parking areas. Although the park is open year-round, over 70 percent of visitation occurs between April and October. In 2017, a total of 1,214,786 visitors were estimated in Washington County, accounting for approximately 25% of all park visitors. Williamsport is the only place in the park where examples of several types of major canal structures and associated structures can be viewed within a half-mile section. Lock 44, Lockhouse 44, a re-watered section of the canal, the Cushwa turning basin, the Bollman Bridge, the Railroad Lift Bridge, and the Conococheague Aqueduct are all located in this part of the park. Interpretive staff at Williamsport provide visitor tours of Lockhouse 44, lock demonstrations, boat tours within the watered canal sections, and interpretive walks. Staff also provide educational programs to local school groups, with operations centered in the Williamsport area.

Impacts of Alternative 1 – No Action

The impacts of Alternative 1 would be the same as the current management of the area. NPS will not build a new administrative building or a visitor center in the project area. The existing visitor center, located on NPS property in the Cushwa warehouse, would remain in its current location, as would parking for the general public. Visitors to this area of the park would not need to cross U.S. Route 11, so additional pedestrian safety measures would not be installed. Trends show fairly consistent increases in visitation since the mid-1990's (Figure 3). As such, these trends would be expected to continue. Interpretive programming would continue unchanged. The project area would remain in the ownership of Washington County and buildings and grounds would remain vacant but potentially open for other development opportunities through the county.

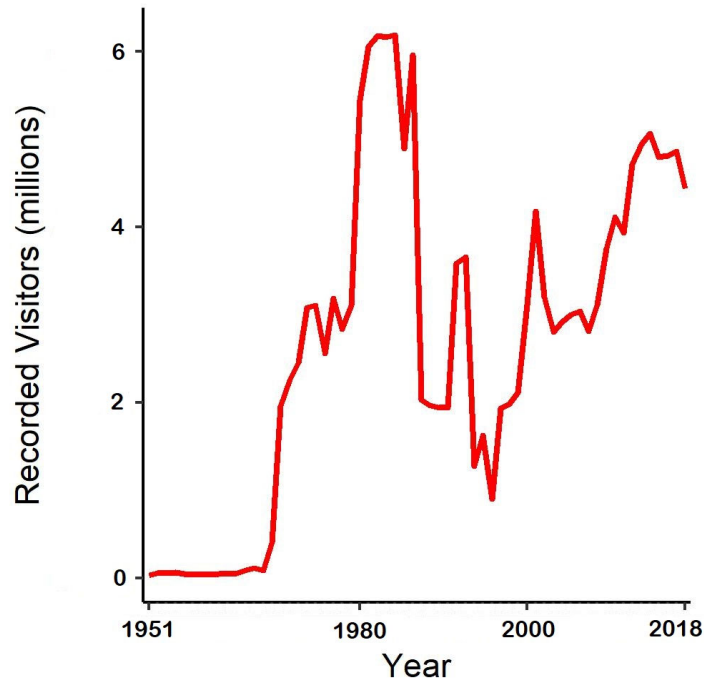


Figure 3. Total visitation for the park from 1951 through 2018

Impacts of Alternative 2 (NPS Preferred)

The center of interpretive operations under this alternative will shift from within the park boundary at the Cushwa Warehouse to the new visitor center within the project area. The visiting public will park within the project area in a newly constructed parking lot. All visitors will need to cross U.S. Route 11 to access the park, including for recreation, use of the canal towpath, or to experience the natural and cultural resources of the park. To facilitate safe pedestrian traffic to the park, traffic control measures including stoplights and designated crosswalks will be installed across U.S. Route 11 as well as Commerce Street to the west. Park visitation would be expected to continue to increase, at a rate similar to the no action alternative, but potentially slightly higher as the park engages with and encourages tour bus groups to visit the park. Interpretive programming and educational program offerings are expected to remain unchanged.

HISTORIC STRUCTURES

Affected Environment. The project area includes 4.8 acres encompassing former property of the Miller Lumber yard which operated from around 1890 to 2017. Three main buildings are currently standing on the site: the large Miller Lumber building and its associated sheds, a small brick house on Potomac Street called the Cline House (WA-WIL-185; built mid-1880's), and a nineteenth-century frame house along Salisbury Street known as the Malott House (WA-WIL-72; built 1865-1877). The Miller Lumber building (WA-WIL-189) is a composite structure incorporating a stone house (c. 1791) and attached frame structures (c. 1920) fronting to Potomac Street, a Planing Mill and Wood Sheds (c. 1920), and a large metal building (c. 1975). The Cline House, Malott House, and Miller Lumber building complex are listed in the Williamsport Historic District as contributing features. The project area is adjacent to the Chesapeake and Ohio Canal National Historical Park Historic District, which is listed on the National Register of Historic Places (listed 1979; boundary increase February 3, 2015). Contributing structures within the C&O Canal Historic District adjacent to the project area include the Cushwa warehouse, Williamsport (Cushwa) Boat Basin, Conococheague Aqueduct, Williamsport Generation Station, Lock 44 and Lockhouse, railroad lift-bridge, canal prism, berm, and towpath, and the Bollman Bridge.



The Malott House, located at 129 W. Salisbury Street, is named after a former owner (Figure 4). It was likely constructed between 1865 and 1877 by the owners of the Cushwa Warehouse as housing for workers in their coal and lumber yard. It is listed as a contributing element to the Williamsport Historic District. The house is a two-story frame building with an attic but no basement. It consists of a 3-bay front section with gabled ends, one room deep, and a rear section with an attached two-story porch. The exterior is covered in asbestos shingles and the roof is metal. There is no interior stair; access to the second floor is via the exterior porch stairs. The house was most recently used for storage by the owners of Miller Lumber and it is colloquially known as the “Insulator House” after one of the products stored there. To facilitate access, openings for large double doors were cut into the west side of the structure on both floors. A metal shed constructed in the twentieth century is attached to the rear of the structure.

The Cline House is a small brick house at 124 W. Potomac Street, in the northeast corner of the Miller Lumber property (Figure 5). It is shown on a map dated 1877, and the Williamsport Historic District Nomination dates it to the “mid nineteenth century.” It is a two-story, 3-bay structure with gabled ends and includes a basement and an attic. The front door is in the center of the north façade and the stairs are also central, with rooms on either side on both floors. The house currently has a porch on the front and a rear addition, but these are modern components. The Cline House requires substantial renovation. The brick work is cracked and bulging and sections of the walls would need to be rebuilt and/or repointed. Some of the beams require reinforcement. The roof requires work to prevent water entry. A small, modern garage sits behind the Cline House.



Figure 4. The Malott House, built between 1865 and 1877



Figure 5. The Cline House, built circa 1880

The stone house that forms the northwest corner of the Miller Lumber structure was probably built around 1791 by Matthew and William Van Lear. After electrification of the town of Williamsport in 1918, the lumber operation moved to the project area and began further development of the site. By 1929, the additional frame structures attached to the stone house had been constructed along Potomac Street (Figure 6), as well as the Planing Mill to the south of the stone house and lumber storage sheds south of the composite Miller Lumber building. The Planing Mill consists of one-story component to the west and a two-story component to the east and the sheds consist of three adjacent, wood-framed structures, each two stories in height. The large metal structure was built around 1975 (Figure 7). Steel supports for the metal structure are built into the frame of the Planing Mill and portions of the exterior south walls of the stone house and frame structures along Potomac Street have been removed and are currently under the roof of the modern metal building.



Figure 6. Facing southeast toward the project area. The stone house is seen on the right. The additional frame structures are connected to the left of the stone house. Image from c. 1930



Figure 7. The composite Miller Lumber structure, including the stone house, frame additions, Planing Mill and lumber storage, and modern steel-frame structure.

Impacts of Alternative 1 – No Action

Non-NPS historic structures in the project area, including the Malott House, Planing Mill, and Wood Sheds, would not be removed and would remain in place. The other historic structures, including the Cline House and the Potomac Street buildings, would not be stabilized and would remain vacant and potentially open to other development opportunities through the county. The Cline House, Malott House, and the historic components of the Miller Lumber building have not been properly stabilized prior to



becoming vacant buildings. No NPS structures in the area will be affected. Interpretive and educational programming in the Cushwa Basin area would remain the same.

Impacts of Alternative 2 (NPS Preferred)

Under this alternative, several non-NPS historic structures listed in the Williamsport Historic District will be removed from the landscape. These include the Malott House, the Planing Mill, and the lumber storage sheds behind the metal structure (Figure 8). These structures are listed as contributing resources to the Williamsport Historic District (2001).

The Malott House was documented as Poor to Fair condition in 2018 by Marshall Craft Associates and others and in 2019 by 1200 Architectural Engineers 2019, and would require substantial renovation to be made usable for any purpose. In particular, the porch and exterior stair, which is the only way to reach the upstairs, are so degraded that they would need to be demolished and reconstructed. Both the roof joists and the joists for the first floor are inadequate and in need of reinforcing, and there are holes in the floor of the first floor. Prior to its listing in the Williamsport Historic District in 2001, the house had lost some integrity of materials and workmanship due to the replacement of the roof, the installation of asbestos shingles, the installation of the double doors on both floors, and the replacement of the porch and exterior stair. The demolition of houses around the Malott House, coupled with the current condition of the building, have caused the house to lose much of its historic context, ultimately affecting its integrity of setting and feeling. At current, the Malott House does not present an option for suitable reuse within the project area and proposed site development. Due to the current condition, loss of structural integrity, and loss of cultural context, removal of the Malott House is a minor, yet negative effect of this alternative.

The Planing Mill, located to the south of the stone house, would also require substantial renovation and modification for reuse. Portions of the second floor joists require reinforcement in the form of wooden sister boards, and first floor joists may also require reinforcement, depending on the form of adaptive reuse. Sections of the first floor will also require reinforcement with new wood bracing or shear walls to enhance lateral load capacity. The roof purlins, beams, and trussed beams would also require reinforcement to increase the load capacity of the purlins and decrease the load on existing trussed beams. Removal of the Planing Mill building constitutes a loss of historic structures; however, the structural integrity of the building may be compromised in part to the construction of the modern metal component that is tied into the Planing Mill. The Planing Mill does not present a suitable option for adaptive reuse in the proposed plan.

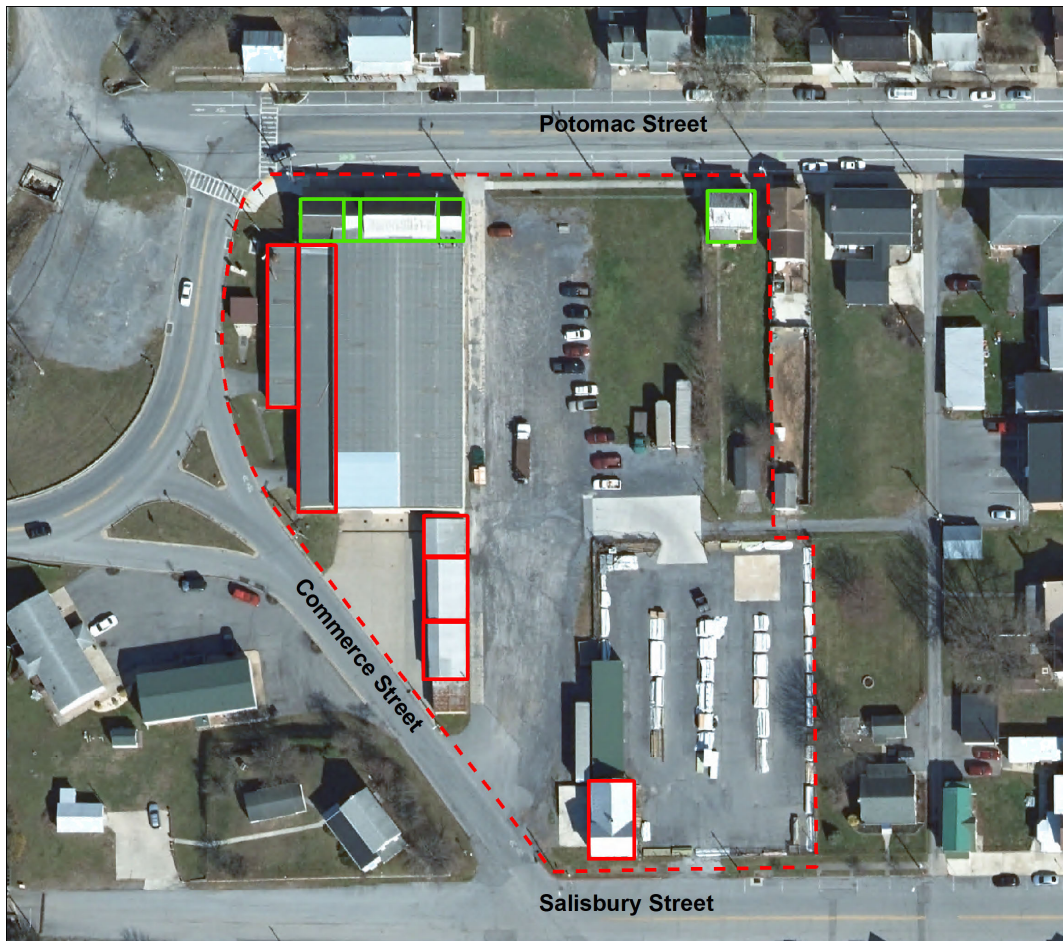


Figure 8. Historic structures to be removed outlined in red, with historic structures to be stabilized outlined in green. The project area is outlined with a red dashed line.

Certain modern structures will also be removed under this alternative. The modern, pre-engineered structure of the Miller Lumber building will be removed. The open garage bay structure behind the Malott House will also be removed, as will the concrete masonry unit garage behind the Cline House.

Portions of the rear, south façades of the Potomac Street storefront buildings were removed in 1973 when the addition was built. As a result, removal of the modern component of the Miller Lumber building will expose the interior of portions of the structures situated along Potomac Street. Under this alternative, the NPS will mitigate the impact of the modern structure removal by stabilizing the rear façades and installing a weatherproof envelope to ensure structural stability. Remaining historic structures, including the stone house and adjoining framing structures and the Cline House, will be structurally stabilized to accommodate potential adaptive reuse. Rehabilitation of these structures will meet The Secretary of the Interior's Standards for the Treatment of Historic Properties. The recent section of the Potomac Street structures that infilled an historic carriageway will be returned to its more historic condition as a covered alleyway. Potential future use of the stabilized historic buildings include the incorporation of the Cline House into the park's Canal Quarters program, whereby park visitors can reserve and stay the night in a restored, historic building, and using the Potomac Street structures as a potential visitor contact station or for other park services, including food or bicycle rental. The NPS will continue consultation with the Maryland Historical Trust to determine appropriate adaptive reuse of the buildings.

ARCHEOLOGY

Affected Environment. Archeological investigations were undertaken to assess known and potential resources within the project area. Among those resources were two previously demolished structures that stood along Potomac Street (Figure 9). These two buildings, the Long/Denham house and the Stricker/Loy house, were constructed of logs in the late 18th or early 19th century. The intact stone foundations of these structures exist below the ground surface. Artifacts dating to the entire period of occupation of these buildings also exist throughout the rear yard of the two house sites. A below-ground section of stone wall sits behind the Long/Denham house, likely a foundational remnant of a garage or carriage house. Domestic and kitchen debris artifacts, as well as the remains of a retaining wall, have been found in the rear yard of the Cline House. Artifacts of kitchen debris were also found near the Malott House. A brick structure labeled as a blacksmith shop in 1918 and ice storage in 1929 can be seen in the Sanborn fire insurance maps in the southeastern corner of the project area. Ground penetrating radar indicated a cellar or basement, but no direct evidence was discovered in field investigations. Between the Malott House and the blacksmith shop was a subdivided frame structure. Both the blacksmith shop and the frame structure were previously demolished and not visible in the 1942 Sanborn map. No evidence of the frame structure remains. A one-story dwelling, built in approximately 1920, had stood along Commerce Street to the west of the Malott House. No archeological remains were found during investigations at this location.

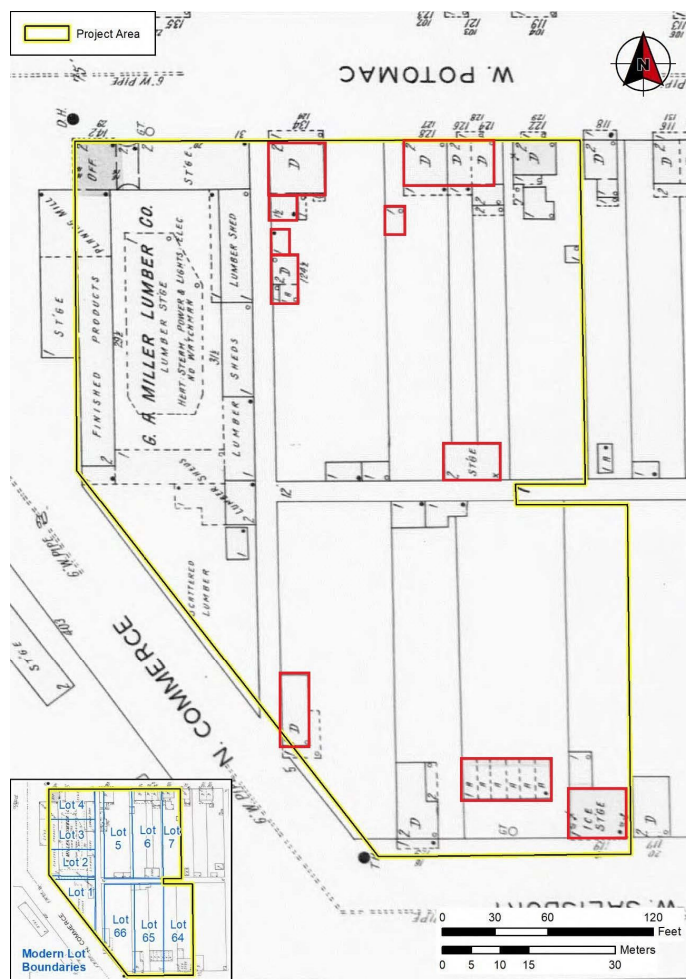


Figure 9. Sanborn insurance map from 1929, showing the location of previously demolished structures outlined in red.



None of the yard deposits or kitchen and architectural debris has sufficient research potential or depositional integrity for eligibility to the National Register of Historic Places under Criterion D. A large number of yard deposits exist throughout the project area, but all materials were mixed, with 20th century artifacts present in every context. The foundation remains of the Stricker/Loy house likely date to c. 1800; however, the cellar was modified in the 20th century and there is minimal research potential and minimal integrity remaining. The structural remains of the Long/Denham house also date to c. 1800. Sub-surface evidence of the blacksmith shop may exist but was not discovered in field investigations. The sites associated with the Long/Denham house, the Stricker/Loy house, the Malott House, and the Cline House all lack high integrity and have little research potential. As such, they are not considered eligible for listing in the National Register of Historic Places. Archeological testing under the concrete slabs of the modern Miller Lumber building and the Stricker/Loy House have not yet been conducted.

Impacts of Alternative 1 – No Action

Archeological remains of the previously demolished Stricker/Loy house, the Long/Denham house, and stone outbuilding foundation would not be removed and would remain *in situ*. The artifacts uncovered during archeological investigations would be catalogued and returned to Washington County. The composite Miller Lumber building will not be removed so further archeological investigations under the existing concrete slab would be unnecessary. The project area would remain the property of Washington County, which may choose to open the site to other development opportunities or leave it vacant.

Impacts of Alternative 2 (NPS Preferred)

The 1,916 archeological artifacts discovered during Phase IA and IB investigations throughout the project area will be catalogued and provided to Washington County as the owner of the property. The stone foundations of the Stricker/Loy and Long/Denham houses will be destroyed or removed during construction of the administrative building, visitor center, and potential transportation infrastructure. The remaining stone foundation of the outbuilding will similarly be destroyed or removed. The foundation or cellar of the blacksmith shop was discovered through ground penetrating radar, but not uncovered during field investigations. Under this alternative, the area of the blacksmith shop will be paved for parking. The fill material here is approximately 3 feet thick: installation of transportation infrastructure, including parking lots or roads, is not likely to affect any structures or artifacts deeper than 3 feet below the ground surface. These foundations and structures are not included in the Williamsport Historic District and lack the integrity and eligibility to be listed in the NRHP.

During the development of the site, the concrete slabs under the modern Miller Lumber building and the Stricker/Loy House will be removed. The NPS will develop an archeological monitoring plan in consultation with the Maryland Historical Trust and other consulting parties to ensure that any significant archeological deposits under the modern concrete slabs are identified. If significant resources are identified, an appropriate mitigation plan will be prepared and implemented by the NPS.

CULTURAL LANDSCAPES AND HISTORIC DISTRICTS

Affected Environment. The 4.8 acre Miller Lumber site lies within the Williamsport Historic District. The gridded transportation infrastructure, historic stone, brick, and wood architecture, and the influence of industry on the town are all significant components of the historic district. The historic town of Williamsport was laid out on a grid pattern with wide streets of 80 feet to allow for turning wagons. Although modern development to the northeast and southeast have taken on more curvilinear patterns, the original grid of the historic district remains intact. Alleys running both north-south and east-west cross the interior blocks created by the grid.

Almost 20% of the buildings within the Williamsport Historic District date from the late 18th and early 19th centuries and are generally of log or brick construction. Although many of the residential buildings have been covered with vinyl or aluminum siding, the structures themselves retain much of the original fenestration and massing. Outside of the project area, the Williamsport streetscape appears much as it was



during the late 19th and early 20th century. The Long/Denham and Stricker/Loy Houses, along the south side of Potomac Street, were demolished within the last decade, leaving a gap in the street wall not characteristic of the density of Williamsport's center commercial street (see Figure 9). The remaining buildings, including the components of the Miller Lumber building that line Potomac Street, the Cline House, and the Malott House, are all contributing to the historic district. The project area also lies directly across the street from the Cushwa Basin area of the C&O Canal National Historical Park, which is a component of the C&O Canal Historic District. Key landscape elements within the C&O Canal and Williamsport Historic Districts are listed in Table 1.

Table 1. Contributing components of the cultural landscape in the project vicinity

Contributing Landscape Component	Historic District
Canal, towpath, and berm	C&O Canal Historic District
Cushwa Basin	C&O Canal Historic District
Cushwa Warehouse	C&O Canal Historic District
Conococheague Aqueduct	C&O Canal Historic District
Western Maryland Railroad	C&O Canal Historic District
Railroad lift bridge	C&O Canal Historic District
Bollman Bridge	C&O Canal Historic District
Lock 44 and associated lockhouse	C&O Canal Historic District
Williamsport Power Generating Station	C&O Canal Historic District
Miller Lumber building	Williamsport Historic District
Williamsport street grid	Williamsport Historic District
Historic architecture throughout Williamsport	Williamsport Historic District
View from towpath to the river and Warehouse	n/a
View from the Cushwa Basin toward Williamsport	n/a

Impacts of Alternative 1 – No Action

The gaps in the Potomac Street gridded streetscape, where buildings were previously demolished, would remain. The modern components of the Miller Lumber building would remain, as would the associated historic structures, including some historic components of the Miller Lumber building and the Malott House. The Cline House and structures fronting Potomac Street would also remain. Structures within the C&O Canal Historic District would not be altered. The project area would not be developed or paved and Washington County would remain the property owner. The County may choose to open the site to other development opportunities or leave it vacant.

Impacts of Alternative 2 (NPS Preferred)

Under this alternative, buildings that contribute to the historic district will be removed, and contributing views from the park will be altered. The ell section of the Miller Lumber building that houses the Planing



Mill will be removed as will the entire Malott House. The modern components of the Miller Lumber building will also be removed. The gaps that currently exist along the streetscape of Potomac Street will be partially filled by the massing of the newly constructed visitor center. While the newly constructed headquarters will constitute a new building on the landscape, it will be contextual to the district and sympathetic to the historic Planing Mill in its massing, fenestration, and materiality. The exterior façade of both the administrative building and visitor center will be designed in consultation with the Maryland Historical Trust to ensure it does not detract from the cultural landscape and that it minimizes impacts on the viewshed. The buildings will be compatible with the historic character of Williamsport and the C&O Canal cultural landscapes. The new buildings will follow an appropriate architectural style, materials, scale, and follow spatial organization patterns related to the existing town development to limit impacts to the cultural landscape. The administrative building will alter the viewshed from the Cushwa Basin and towpath but will not greatly affect the vista of the Cushwa Warehouse or Power Generating Station.

This alternative also includes the pavement of approximately 97 parking spaces and other infrastructure associated with a parking lot: an additional modern element introduced to the landscape. However, this alternative will also move general vehicle parking from the Cushwa Basin to the project area, removing it from the cultural landscape of the Basin and from the significant vistas of the Basin area and from the towpath. The placement and orientation of the administrative building will mostly obscure views of the parking lot from the towpath and Cushwa Basin; however, these views will be negatively affected by the loss of the Planing Mill and the addition of the administrative building and visitor center.

CUMULATIVE IMPACTS

Impacts of the NPS proposed alternatives on visitor use and experience, historic structures, archeology, and cultural landscapes and historic districts were identified. Cumulative impacts were determined by combining the impacts of these NPS proposed alternatives with other present and reasonably foreseeable future actions. These cumulative actions include an Environmental Assessment for Williamsport, the restoration of the Conococheague Aqueduct, rehabilitation of the Railroad Lift Bridge, past and future pedestrian access over the canal, and future rehabilitation of the Cushwa Warehouse and power generating station.

Restoration of Canal Operations at Williamsport Environmental Assessment (past). The park completed an Environmental Assessment in 2011 that focused on development and refinement of interpretive operations centered in Williamsport. The selected alternative included extensive restoration efforts, including rewatering of the canal, making Lock 44 operational, and development of an extended interpretive launch boat experience. This document also identified several projects listed below, including the restoration of the Conococheague Aqueduct and the rehabilitation of the Cushwa Warehouse and Power Generating Station.

Rehabilitation of the Railroad Lift Bridge (past). The Railroad Lift Bridge, built in 1923 to facilitate a rail spur to the Potomac Edison coal-fired power plant, is a steel truss bridge with wooden track and ties. Its purpose was to carry a railroad spur over the canal to deliver coal to the power plant on the towpath side, but became obsolete due to the 1924 flood. In 2014, the park rehabilitated the lift bridge and raised the span that crosses the canal. It is currently fixed in the raised position to allow for passage of interpretive canal boats.

Restoration of the Conococheague Aqueduct (current). The Conococheague Aqueduct, the second largest of eleven aqueducts along the C&O Canal, is located at the confluence of the Conococheague Creek and the Potomac River, adjacent to the Cushwa Basin area. The aqueduct was originally built in 1834 and carried canal boats over the creek on three 60-foot masonry arches constructed of locally quarried compact blue limestone. The structure had fallen into disrepair, due in large part to flooding and impacts of significant flood debris against the structure. This project restored the structural integrity of the aqueduct and is expected to be complete in mid-late 2019.



Pedestrian access over canal prism (past and future). With the completion of the restoration of the Conococheague Aqueduct, pedestrian access to the towpath from the Cushwa Basin parking area is removed, causing pedestrians to access the towpath 0.6 miles south of the current visitor center. In 2019, the park constructed temporary wooden stairs and a bridge span over the Railroad Lift Bridge to provide pedestrian access from the parking lot to the towpath. This access is considered temporary and will be removed after permanent pedestrian access has been established. The park is currently considering the construction of a permanent pedestrian access bridge just south of the historic Bollman Bridge, which conveys vehicles from Salisbury Street to the town-owned River Bottom Park. The new bridge would not be attached to the historic bridge, but would be positioned adjacent. The park consulted with the Maryland Historical Trust in the placement of the new bridge. Its placement and height would remove it from the key vista and viewshed from the Cushwa Basin and towpath looking south toward Lock 44.

Rehabilitation of the Cushwa Warehouse and Williamsport Power Generating Station (future). The Cushwa Warehouse (1790-1810) and the Power Generating Station (1896) are contributing structures on the National Register of Historic Places. This project will address issues with water infiltration by regrading the surrounding ground surface to direct stormwater away from the brick walls. This project will also rehabilitate mortar joints and spalled bricks and replace metal roofing, windows, window sills, and doors.

The impacts of the past and reasonably foreseeable future actions, in conjunction with the NPS proposed alternatives, would result in cumulative impacts to visitor use and experience, historic structures, and cultural landscapes and historic districts.

Alternative 1 – No Action

With no action, the center of interpretive operations in Williamsport would remain in the Cushwa Basin, with the visitor center remaining in the Cushwa Warehouse. The pedestrian access bridge over the canal south of the Bollman Bridge would still be installed as the restoration of the Conococheague Aqueduct precludes visitor access to the towpath. Visitor experience may be slightly and temporarily affected during rehabilitation of the Cushwa Warehouse, as this is the location of the current visitor center under Alternative 1. Completion of the restored Conococheague Aqueduct may increase visitation to the Williamsport area; however, under this alternative, the visitor center will remain in the Cushwa Warehouse and is inadequate for larger visitor groups.

Alternative 2 (NPS Preferred)

Under this alternative, past and future planned projects cumulatively enhance visitor use and experience of the Williamsport area by repairing and rehabilitating historic structures and providing a new and updated visitor center. The Williamsport area of the park will be better equipped to facilitate increased visitation due to the new visitor center and parking lot while past projects collectively increase visitor experience by providing restored, unique historic structures in a single area. Relocation of the park visitor center and staff offices into the new buildings in the project area will remove modern components and infrastructure from the historic Cushwa Warehouse. This will allow the future rehabilitation project to properly restore or stabilize the Warehouse. Past and future projects to restore historic structures in this area will cumulatively benefit the cultural landscape of the Cushwa Basin: relocation of general parking out of the Basin and rehabilitation projects will enhance the viewshed and vistas into and within the park.

CONCLUSIONS

The no action alternative will not cause any new impacts to historic structures or archeology and will continue to affect the cultural landscape of the Cushwa Basin from the location of visitor parking.

Relocation of the park headquarters and Williamsport visitor center to the project area will enhance visitor experience through the construction of a modern visitor center capable of serving an increased public visitation. This alternative will cause negative impacts to historic structures through the removal of



the Planing Mill and Wood Sheds, but will stabilize the historic buildings that front Potomac Street. The historic Malott House will also be removed from the landscape. Sub-surface artifacts, including foundation remains, will be negatively affected during construction, and appropriate mitigation measures will be identified and discussed with the Maryland Historical Trust. A Memorandum of Agreement will be developed in collaboration with the Maryland Historical Trust that will define mitigation strategies and an archeological monitoring plan. This alternative will also affect views of the cultural landscape from the Cushwa Basin toward the town of Williamsport, but will enhance the vista toward and within the Cushwa Basin area of the park through the relocation of visitor parking.



CONSULTATION AND COORDINATION

AGENCY SCOPING

As part of Section 106 of the National Historic Preservation Act (Section 106) compliance, the park held multiple consultation meetings with the Maryland State Historic Preservation Office (SHPO). The park held a Consulting Parties meeting on April 11, 2019 with the C&O Canal Association, the Canal Towns Partnership, and the Heart of the Civil War Heritage Area, Maryland Department of Transportation, Preservation Maryland, the Town of Williamsport, Washington County Public Schools, and the Washington County Historical Trust, Inc. The park additionally extended an invitation to the Defenders of Potomac River Parkland and the George Tyler Moore Center for the Study of the Civil War, and also accepted written comments from the Washington County Historic District Commission. As part of this process, due to the adverse effect of the removal of multiple historic structures within the project area and the visual impacts to the cultural landscape and historic district, the park, along with the SHPO and consulting parties, are preparing a Memorandum of Agreement (MOA) to memorialize the best method of minimizing and mitigating the overall adverse effects of this proposal. The MOA will also outline, in detail, an archeological monitoring plan. The affected structures and archeological resources are not located on property owned or administered by the NPS. C&O Canal NHP will notify the Advisory Council on Historic Preservation (ACHP) of an undertaking resulting in an Adverse Effect and will detail the mitigations with which the park has concurrence from the Maryland SHPO.

Based on known information about Native American groups in the study area, NPS included Catawba Indian Nation, Delaware Nation, and Stockbridge Munsee Band of Mohican Indians as consulting parties. The Catawba Indian Nation and the Stockbridge Munsee Band of Mohican Indians declined to participate. The Delaware Nation participated in one consulting party meeting, suggested that our direction was appropriate, appreciated being consulted, but had no further interest in the project. Therefore, no additional consultation with Native American groups will be forthcoming. In the event that human remains are discovered, the procedure laid out in 43 CFR 10.4, the Native American Graves Protection and Repatriation Act, shall be followed.

PUBLIC SCOPING

A public scoping meeting was held on April 9, 2019. Immediately following all public meetings, open comment periods were announced through the NPS' Planning, Environment and Public Comment website. Comments from the public and consulting parties were accepted throughout the duration of the NEPA process.



REFERENCES

1200 Architectural Engineers, PLLC. 2019. Williamsport Historic Buildings: Structural Assessment. Final Report submitted to MEDCO and the National Park Service.

Bedell, J. and G. Katz. 2019. Phase IA and IB Archeological Investigations of the Miller Lumber Site for the new Headquarters of the Chesapeake and Ohio Canal National Historical Park. Final Report submitted to MEDCO and the National Park Service.

De la Fuentes, A., L. S. Paden, J. Bedell, and M. McCulley. 2019. Historic Structure Report: Miller Lumber Site. 50% Draft Report submitted to MEDCO and the National Park Service.

Marshall Craft Associates, Inc., James Posey Associates, Inc., and Whitney Bailey Cox & Magnani, LLC. 2018. Conditions Assessment: G. A. Lumber Company Site, Williamsport, MD. Final Report submitted to MEDCO and the National Park Service.

National Register of Historic Places. 2001. National Register of Historic Places Registration Form: Williamsport Historic District.

National Register of Historic Places. 2015. National Register of Historic Places Registration Form: Chesapeake and Ohio Canal National Historical Park Historic District. Supplemental Listing Record: Boundary Increase.

Rentsch, S., J. Bedell, and M. McCulley. 2019. Cultural Landscape Report: Miller Lumber Site and Adjacent Portions of the Chesapeake and Ohio Canal National Historical Park. 90% Draft Report submitted to MEDCO and the National Park Service.