



## FINDING OF NO SIGNIFICANT IMPACT

### Expand Existing Transit Maintenance Facility Harpers Ferry National Historical Park

The National Park Service (NPS) proposes to improve and expand the existing transit maintenance facility at the Harpers Ferry National Historical Park, located at the confluence of the Shenandoah and Potomac Rivers, at the point where West Virginia, Virginia, and Maryland converge. The park's bus fleet provides public transportation from the park's visitor center to other areas throughout the park. The proposed transit maintenance facility expansion will provide increased capacity for indoor storage of buses and other maintenance equipment and operations, including an employee workspace consisting of a break room, restrooms, lockers, and an office.

The proposed action is needed because the existing facility provides shelter and maintenance space for only a portion of the park's bus fleet and includes a rudimentary office and storage area for the bus mechanic. The facility is the only fueling station for the park's bus fleet and has no potable water or restrooms.

The NPS completed an Environmental Assessment (EA) that provides an analysis of the environmental consequences of the alternatives considered for the resource protection and visitor accommodation projects. This EA was prepared in accordance with the National Environmental Policy Act of 1969, as amended (NEPA), its implementing regulations by the Council on Environmental Quality (CEQ) (40 CFR 1500-1508), and Director's Order 12 (DO-12), Conservation Planning, Environmental Impact Analysis and Decision-making, and accompanying Handbook. As required by NPS *Management Policies 2006*, a finding of non-impairment is included as attachment A of this finding of no significant impact (FONSI).

### NPS SELECTED ALTERNATIVE

Based on the analysis from the EA, the NPS selected for alternative B for implementation (the NPS Preferred Alternative), described on page 23 of the EA. The selected alternative will include construction of a new addition to the existing transit maintenance facility, renovation of the existing building, and reconfiguration of the site to provide one-way bus traffic and employee parking.

**Building Expansion:** The building will be expanded from its current footprint of 4,721 square feet to a size of approximately 10,800 square feet and will be designed to provide adequate space for maintenance operations to take place inside the facility. Expansion of the building will allow for storage of up to 15 vehicles, should the park decide to expand its fleet of 10 vehicles in the future. Expansion will occur on the west side of the existing building. The earth berm currently located to the west of the building will be removed and reconstructed, and any excess fill may be used elsewhere within the project for grading and new berms. Any unused fill will be used for other ongoing park projects. A bus wash bay and improved maintenance and lift bays will also be included in the new facility, as well as a new employee break room, lockers, restrooms, office, and storage space. The building will be ADA compliant and meet industry safety standards and building codes.

**Utility Improvements:** Energy efficient utilities will be installed in the updated facility, including a new HVAC system, air circulation system, and plumbing. Other sustainable site improvements will include enlargement of the stormwater control system, use of vegetated swales along pavement areas, and consideration of low consumption or no consumption plumbing fixtures. The new wash bay will recycle and filter gray water for reuse in washing vehicles, and the construction waste will be recycled, as well. Since there is no sanitary sewer service provided at the existing building, a new sanitary grinder pump station will be installed, which will pump effluent from the transit maintenance facility to the existing pump station. The new pump station will be located to the north of the existing transit maintenance facility, and the pump (about six feet in diameter) will be placed underground, with only the water tight

lid showing above ground. In addition, in order to provide domestic water to the expanded facility, the existing water service line that runs into the building will be upsized from a 2-inch service line to a 6-inch service line and connected to two fire hydrants and a water meter. The existing line will be abandoned in-place after construction of the new line. These updated facilities will ensure that domestic and fire suppression water will be accessible at the improved facility, as well as a sanitary sewer. A loading dock will be constructed as part of the new facility design to allow for ease in deliveries. Fuel will continue to be stored at the facility, but in an above-ground, double-walled steel tank located to the north of the proposed transit maintenance facility expansion, as opposed to the current storage in an underground tank. A new security system, lighting, and upgraded electrical and telephone/data system will be included in the building design. This new electric service will likely come from a connection near the visitor center and require an upgrade to 3-phase power.

**Site and Building Drainage:** The facility's site and building drainage will be redesigned to effectively handle any increase in runoff from the increase in impervious surfaces as part of the alternative. The NPS will incorporate additional stormwater management systems in the design to treat and minimize impacts to existing downstream bodies of water near the project area. The portion of the visitor parking lot and roadways in the project area may be paved using asphalt and/or pervious paving materials. Stormwater run-off will be collected via grass swales where possible, or if necessary, conveyed via concrete curb and gutter or pumped systems to low-impact treatment facilities such as a pre-fabricated Filterra stormwater treatment filter. The roof on the building will remain the same; however, employees will be provided with a new main entrance to the facility in the expanded portion and will no longer need to use the entrance prone to icy conditions.

**Site Layout:** The access to and egress from the site will be configured to allow for one-way vehicular traffic flow around the building. The existing parking area associated with the facility will remain, but access will be gained from the south, while egress will move to the north. The proposed bus bay configuration will include pull-through bays to greatly reduce the need for 3-point turns. Employee parking will be provided separately from the visitor parking, and an ADA-compliant concrete pedestrian walkway will be constructed. A mixture of indigenous plantings will be recreated and planted around the expanded facility and modified visitor parking area as part of the proposed landscape plan for the project. The new plantings, combined with the grade differential between the expanded facility and the existing visitor center will provide screening of the new facility. Facility expansion will require encroachment onto the existing visitor overflow parking lot and the existing entrance road to the bus facility due to the existing topography. Modifications to the existing visitor parking area and overflow parking area will be required to allow for a partial realignment of the access road to the transit maintenance facility. With the reconfiguration of the parking lot, up to 80 additional spaces will be added to the visitor center parking lot, which will also serve to expand the fee base for the Park.

## **Mitigation**

A variety of mitigation measures will be instituted as the actions are taken to implement this alternative. The NPS will implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are being properly implemented and are achieving their intended results.

In order to minimize impacts on soils and topography and the local soundscape, mitigation measures will include the following stipulations:

- Erosion control measures, such as erosion matting, silt fencing, and sedimentation basins will be required in construction or demolition areas where soil is exposed in order to reduce erosion, surface scouring, and discharge to water bodies, will be implemented in areas where soil is exposed during construction.
- Soils excavated on site will be re-used wherever possible on site.
- A dust abatement program will be implemented. Standard dust abatement measures could include the following elements: water or otherwise stabilize soils, cover hauling trucks, employ speed limits on unpaved roads, minimize vegetation clearing, and revegetate after construction or demolition.

- A General West Virginia/National Pollution Discharge and Elimination System (NPDES) Water Pollution Control Permit will be acquired, due to the expansion of the facility resulting in over one acre of land disturbance.
- Porous pavement will be used, where possible, in order to decrease the effect of hardened surfaces and allow for better drainage and less soil impacts as opposed to completely impervious surface.
- A spill prevention and pollution control program for hazardous materials will be implemented. Standard measures could include hazardous materials storage and handling procedures, spill containment, cleanup and reporting procedures, and limitation of refueling and other hazardous activities to non-sensitive sites.
- Standard noise abatement measures will be implemented during construction. Standard noise abatement measures could include the following elements: a schedule that minimizes impacts on adjacent landowners and noise-sensitive uses, the use of the best available noise control techniques wherever feasible, the use of hydraulically or electrically powered impact tools when feasible, or location of stationary noise sources as far from sensitive uses as possible.

## **OTHER ALTERNATIVES CONSIDERED**

In addition to the NPS selected alternative described above, the EA analyzed a no-action alternative.

### **Alternative A (Noaction)**

Alternative A would continue present management operations and maintain the existing transit maintenance facility at the site. The park would continue to use the facility, as is, for vehicle maintenance and storage. There would be no change to the existing building, including its size, utilities, and employee accommodations. Access to and egress from the facility would take place via the existing entrance road, and the existing berm would screen the facility from the visitor center parking lot. This alternative was not chosen because it did not meet the overall purpose and need for the project as well as the selected alternative.

## **ENVIRONMENTALLY PREFERABLE ALTERNATIVE**

In accordance with DO-12 and NEPA, the NPS is required to identify the environmentally preferable alternative in its NEPA documents. The CEQ defines the environmentally preferable alternative as the alternative that will best promote the national environmental policy as expressed in NEPA's Section 101. In their Forty Most Asked Questions, CEQ further clarifies the identification of the environmentally preferable alternative, stating "Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources." (Q6a)

The NPS has evaluated the impacts resulting from the different alternatives and has determined that alternative A best meets the conditions that would qualify it as the environmentally preferable alternative. Soils would remain compacted under the existing building, roads, and parking lots, and there would be no additional disturbance, as structures would remain in their current configuration. Topography and vegetation would remain the same. Earthwork would not be required under alternative A, as it is in alternative B. Alternative A would result in fewer environmental impacts than alternative B, and alternative A would result in a smaller footprint than that of alternative B.

## **WHY THE NPS SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT**

As defined in 40 CFR Section 1508.27, the significance of an impact is determined by examining the following criteria:

*Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts, which require analysis in an Environmental Impact Statement (EIS):* As described in the EA, there will be beneficial and/or adverse impacts to several park resources, including soils and topography; vegetation; and park operations, management, and safety,



from the proposed actions; however, no significant impacts were identified that will require analysis in an environmental impact statement. Impacts that will occur and were analyzed in the EA include:

***Soils and Topography:*** Impacts of the selected alternative include short-term, minor, adverse impacts on soils due to exposure and/or movements of previously disturbed soils during construction and installation of utilities including exposure of up to 8 acres of soils and movement of 20,000 cubic yards of soils. These impacts will be detectable but will take place in an area where soils have been previously disturbed and are composed mostly of fill material. Additionally, the selected alternative will result in long-term, minor, adverse impacts on soils and topography due to additional compaction and an addition of two acres of impervious surface within the project area as well as noticeable changes to topography. These changes will be detectable but will take place in an area where soils have previously been heavily impacted.

***Vegetation:*** During construction, there will be short-term, negligible, adverse impacts to vegetation due to temporary removal during utility installation and relocation of the berm. Revegetation would be expected to take place following the completion of construction and installation. Construction of the expanded transit maintenance facility will result in long-term removal of 2 acres of vegetation, consisting primarily of lawn and a few trees. Because the impacts to vegetation will affect several individual plants and will affect a very small portion of that species' population, the selected alternative will result in long-term, minor, adverse impacts on vegetation.

***Park Operations, Management, and Safety:*** The selected alternative will provide a safer and more comfortable environment for transit employees, will provide adequate space for maintenance of the existing bus fleet, and will provide additional protection from the elements for the existing bus fleet. The expanded facility will also allow for future expansion of the bus fleet. Because these items will improve upon park operations, management, and safety, the selected alternative will result in long-term, beneficial impacts on park operations, management, and safety.

***Degree of effect on public health or safety:*** The selected alternative will have beneficial impacts to public and employee health and safety. The alternative provides a safer environment for the park's transit employees. The upgraded utilities will provide domestic water, security-lighting, and fire-fighting capacity to improve the health and safety conditions for workers. Improvements to the worker parking and bus circulation will reduce the need for three-point turns in cramped spaces, improve refueling operations, and separate pedestrian and vehicular traffic. The improved entrance road circulation and new signage will decrease the occurrences of visitors entering the maintenance facility area and will enhance the egress for those visitors accidentally entering this area. ABA and code compliant upgrades will address the outstanding life safety issues in the existing structure.

***Unique characteristics of the geographic area such as proximity to historic or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas:*** The expansion of the transit maintenance facility will take place on previously disturbed sites, and no archeological resources have been identified within the project area. In addition, there are no known ethnographic resources, including sacred sites, or Indian Trust resources within the project area. The activities proposed as part of the selected alternative will not take place within any historic district or impact any historic resources listed or eligible for listing in the National Register, nor would work take place in any park designated cultural landscapes or park lands held in trust by the Secretary of the Interior for the benefit of Indians due to their status as Indians. No prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas are located within the project area that will be subject to effects resulting from implementation of the selected alternative.

***Degree to which effects on the quality of the human environment are likely to be highly controversial:*** No highly controversial effects in terms of scientific uncertainties as a result of the selected alternative were identified during the preparation of the EA or by the public during the public comment period.

***Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks:*** No highly uncertain, unique, or unknown risks were identified during preparation of the EA or the public and agency review period.

***Degree to which the selected alternative may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration:*** The selected alternative

neither establishes NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

***Whether the selected alternative is related to other actions with individually insignificant but cumulatively significant impacts:*** As described in Chapter 4 of the EA, cumulative impacts were determined by combining the impacts of the selected alternative with other present and reasonably foreseeable future actions. Cumulative actions include the *Alternative Transportation Study*. Impacts of the selected alternative on soils and topography, vegetation, and park operations, management, and safety were identified; however, the *Alternative Transportation Study* is not anticipated to have cumulative impacts on soils and topography and vegetation because the study calls for the park to increase its bus fleet and make other transit-related changes that do not involve any action on soils and topography and vegetation within the project area. The cumulative impact conclusions were reached for the following impact topic:

***Park Operations, Management, and Safety:*** The *Alternative Transportation Study* will improve park transportation operations by providing more buses for visitor transit, thus decreasing the amount of vehicles that are on the roads within the park. This allows for more efficient travel for park-related purposes. Implementation of the study will result in a long-term, beneficial impact on park operations, management, and safety. The selected alternative, in combination with these cumulative impacts, will result in long-term, beneficial impacts on park operations, management, and safety because park vehicles will be more effectively and efficiently sheltered, maintained, and operated at the facility. This alternative will also offer improved accommodations for employee comfort, and issues associated with employee health and safety will be addressed.

The impacts of the *Alternative Transportation Study*, in conjunction with the selected alternative, will result in long-term, beneficial cumulative impacts on park operations, management, and safety. Therefore, the selected alternative will not contribute to or result in significant cumulative impacts.

***Degree to which the selected alternative may adversely affect districts, sites, highways, structures, or objects listed on the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources:*** The selected alternative will not cause impacts on historic properties. Compliance with section 106 of the National Historic Preservation Act was conducted separately, but concurrently, to the EA process. Information on the project was provided to the West Virginia State Historic Preservation Officer (SHPO) with an NPS Assessment of Effect on historic properties for concurrence. In a letter dated August 22, 2012, the West Virginia State SHPO provided concurrence with the NPS assessment. A copy of this letter is contained in attachment B of this finding of no significant impact.

***Degree to which the selected alternative may adversely affect an endangered or threatened species or its critical habitat:*** In a letter dated March 1, 2012, the U.S. Fish and Wildlife Service acknowledged that no federally listed or proposed threatened or endangered species under their jurisdiction are known to occur within the study area. A copy of this letter is contained in appendix A of the EA.

***Whether the selected alternative threatens a violation of federal, state, or local environmental protection law:*** The selected alternative violates no federal, state, or local environmental protection laws.

## PUBLIC INVOLVEMENT

The public involvement process was initiated in February 2012, when the park distributed a press release and newsletter to the public describing the purpose and need for expansion of the transit maintenance facility and opportunities for public comment. The newsletter was also sent to over 35 various interested organizations and to adjacent landowners. No public comments were received by the park.

The EA was made available for public review and comment on July 30, 2012, as announced through a press release; notice of availability letter sent to the park's mailing list, and the NPS' PEPC website. A digital version was available at <http://parkplanning.nps.gov/>. Hard copies of the EA were also made available for public review at the Bolivar-Harpers Ferry Public Library and the Harpers Ferry National Historical Park's headquarters.

During the 30-day public review period (ending August 30, 2012), no comments were received.

## CONCLUSION

In light of the impacts described in the EA for the project and with guidance from NPS *Management Policies 2006*, natural and cultural resources information, professional judgment, and considering agency and public comments, the NPS has decided to implement the NPS selected alternative, presented as alternative B (NPS Preferred Alternative). Implementing the NPS selected alternative will expand and improve the transit maintenance facility to meet the increased demands on the transportation fleet and to be fully functional as a bus garage, storage area, fuel depot, and an employee work place.

The NPS selected alternative does not constitute an action that normally requires preparation of an EIS and, as noted above, impacts resulting from implementing the action will not have a significant effect on the natural, cultural, or human environment. There are no significant impacts on public health, public safety, threatened or endangered species, historic properties either listed on or eligible for listing on the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified during the impact assessment. Implementing the NPS selected alternative will not violate any federal, state, or local environmental protection laws. Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared. This is a finding of no significant impact.

Recommended:



Rebecca L. Harriett

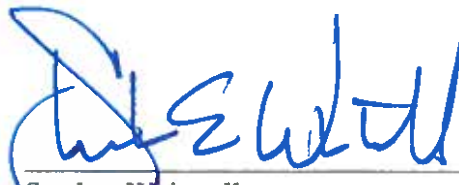
Superintendent

Harpers Ferry National Historical Park

10-16-12

Date

Approved:



Stephen Whitesell

Regional Director

National Capital Region

2-21-13

Date

## ATTACHMENT A: NON-IMPAIRMENT FINDING

The National Park Service has developed *Interim Guidance for Impairment Determinations in NPS NEPA Documents*. That guidance builds upon the statutory direction of the NPS Organic Act to manage resources “unimpaired for future generations” and the interpretation by the NPS of legislative direction in the *NPS Management Policies 2006*.

The *NPS Management Policies 2006*, Section 1.4.4, explains the prohibition on impairment of park resources and values:

*“While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.”*

### What is Impairment?

*NPS Management Policies 2006*, Section 1.4.5, *What Constitutes Impairment of Park Resources and Values*, and Section 1.4.6, *What Constitutes Park Resources and Values*, provide an explanation of impairment.

Impairment is an impact that, in the professional judgment of the responsible National Park Service manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

The NPS has discretion to allow impacts on Park resources and values when necessary and appropriate to fulfill the purposes of a Park (NPS 2006 Section 1.4.3). However, the NPS cannot allow an adverse impact that would constitute impairment of the affected resources and values (NPS 2006 Section 1.4.3).

Section 1.4.5 of *Management Policies 2006* states:

An impact to any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified as a goal in the park’s general management plan or other relevant NPS planning documents as being of significance.

An impact would be less likely to constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

Per Section 1.4.6 of *Management Policies 2006*, park resources and values that may be impaired include:

- the park’s scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air



resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;

- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessionaires, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park, but this would not be a violation of the Organic Act, unless the NPS was in some way responsible for the action.

### **How is an Impairment Determination Made?**

Section 1.4.7 of *Management Policies 2006* states, "[i]n making a determination of whether there would be an impairment, an NPS decision-maker must use his or her professional judgment." This means that the decision-maker must consider any environmental assessments or environmental impact statements required by the National Environmental Policy Act of 1969 (NEPA); consultations required under Section 106 of the National Historic Preservation Act (NHPA); relevant scientific and scholarly studies; advice or insights offered by subject matter experts and others who have relevant knowledge or experience; and the results of civic engagement and public involvement activities relating to the decision.

*Management Policies 2006* further define "professional judgment" as "a decision or opinion that is shaped by study and analysis and full consideration of all the relevant facts, and that takes into account the decision-maker's education, training, and experience; advice or insights offered by subject matter experts and others who have relevant knowledge and experience; good science and scholarship; and, whenever appropriate, the results of civic engagement and public involvement activities related to the decision."

The Expand Existing Transit Maintenance Facility Environmental Assessment analyzes impacts to the following resources: soils and topography; vegetation; and park operations, management, and safety. NPS guidance provides that:

*"impairment findings are not necessary for visitor experience, socioeconomics, public health and safety, environmental justice, land use, and park operations, etc. because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the Organic Act, and cannot be impaired the same way that an action can impair park resources and values."*

As a result, for purposes of this document, impairment findings are required for soils, topography, and vegetation.

### **IMPAIRMENT DETERMINATION FOR THE SELECTED ALTERNATIVE**

This determination on impairment has been prepared for the selected alternative described on pages 23-27 of the EA. An impairment determination is made for all relevant resource impact topics analyzed for the selected alternative. An impairment determination is not made for visitor use and experience, public safety, and infrastructure and park operations because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according



to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values.

### **Soils and Topography**

The selected alternative will require some earthwork to accommodate the addition, a new access drive, and employee parking areas. The reconfiguration and expansion of the site will require removal of the existing entrance road to the bus facility, its associated berm, and a portion of the existing visitor parking lot. During construction, a total of up to eight acres of soil will be exposed during removal of soils and pavement. There will be no long-term impacts, however. Best management practices will be employed to minimize erosion of exposed soils during construction. Additionally, 20,000 cubic yards of soils and pavement will need to be removed from the visitor center parking lot in order to achieve the necessary grading and/or a small amount of bedrock excavation to accommodate a floor elevation that can tie into the existing facility and remain hidden from the surrounding landscape. An effort will be made to balance the cut and fill required for site preparation. Disturbance of soils will be short-term; however, the resulting changes in topography within the project area will be long-term. Soils will become compacted in the long term under the new impervious surface areas required for the building addition and reconfiguration of the visitor parking lot. The park will make an effort to use pervious pavers where able, due to the contaminants associated with asphalt paving. An addition of two acres of impervious surface will increase runoff in the project area. Site and building drainage will be redesigned to effectively handle the increase in runoff from increased impervious surfaces produced as part of the project to avoid causing erosion of soils due to runoff. Overall, impacts of alternative B include short-term, minor, adverse impacts on soils during construction and installation of utilities, in addition to long-term, minor, adverse impacts on soils and topography due to additional compaction and impervious surface within the project areas. Changes will be detectable, but will take place in an area where soils have previously been heavily impacted. Therefore, there will be no impairment to soils and topography.

### **Vegetation**

As part of the selected alternative, removal of some existing vegetation will take place; however, a revegetation plan will be implemented following construction. Expansion of the building and associated site requirements will require some earthwork and cut to accommodate the finished floor elevations. A total of two acres of vegetation, including mostly lawn and approximately 150 existing trees and shrubs, will be removed as part of the project and will be replaced by 75 to 100 new trees and shrubs and improved infrastructure, a long-term impact. The existing earth berm adjacent to the building will need to be removed, which will require that the associated trees also be removed, however, vegetation will be planted along the replacement berm to screen the expanded building according to the revegetation plan. Impacts on vegetation associated with the berm relocation and utility upgrades will be short-term and limited. Overall, alternative B will result in short-term, negligible, adverse impacts during construction and long-term, minor, adverse impacts on vegetation. Therefore, there will no impairment to vegetation.

## ATTACHMENT B: LETTER FROM WV SHPO



August 22, 2012

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

**Randall Reid-Smith, Commissioner**

Phone 304.558.0220 • www.wvculture.org  
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EFO/AA Employer

Ms. Rebecca Harriet  
Superintendent  
National Park Service  
Harpers Ferry National Park  
PO Box 65  
Harpers Ferry, WV 25425

Re: Transit Maintenance Facility Expansion; PEPC Project #: 25173  
FR#: 12-1019-JF

Dear Ms. Harriet:

We have reviewed the additional information submitted for the above mentioned project to determine its effects to cultural resources. As required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties," we submit our comments.

Submitted information indicates that this project will result in the expansion of the Transit Maintenance Facility at Harpers Ferry National Park. According to this information, there are no historic properties or cultural landscapes within the proposed project's Area of Potential Effect, including the viewshed. The building itself is of modern construction. In addition, archaeological investigation of the area was performed in the 1980s in association with the past construction activities. It is your staff's opinion that the proposed project will have no adverse impact on historic properties. After review of the submitted information, including photographs, we concur with this assessment. No further consultation is necessary.

We appreciate the opportunity to be of service. *If you have questions regarding our comments or the permit conditions, please contact Lora A Lamarre-DeMott, Senior Archaeologist, or Shirley Stewart Burns, Structural Historian, at (304) 558-0240.*

Sincerely,

Susan M. Pierce  
Deputy State Historic Preservation Officer

SMP/SSB/LLD

HARPERS FERRY NP  
HARPERS FERRY WV

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