



## FINDING OF NO SIGNIFICANT IMPACT

### MONOCACY NATIONAL BATTLEFIELD

Frederick, Maryland

The National Park Service (NPS) prepared an Environmental Assessment (EA) to analyze the potential impacts of the proposed Public Access Plan (the Plan) for the Monocacy National Battlefield. The Plan is needed to develop strategies aimed at addressing the fragmented nature of the battlefield's visitor access and trail system in order to increase accessibility of park resources, provide connections between disparate areas, and enhance opportunities for visitor education and interpretation.

The EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), the regulations of the Council on Environmental Quality (CEQ) for implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and NPS Director's Order (DO) 12, *Conservation Planning, Environmental Impact Analysis, and Decision-making*. The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below.

### SELECTED ALTERNATIVE

Based on the analysis presented in the EA, NPS selected Alternative B – Action Alternative (page 11 of EA) for implementation. The Public Access Plan, under the selected alternative, will guide the addition of approximately 8 miles of new pedestrian trails, additional interpretive and recreation elements, new visual and pedestrian connections between currently disconnected areas of the park, and increased access to areas previously closed to the public. Both large and small trail loops will provide different trail lengths and a variety of visitor experiences.

The selected alternative provides history-focused trails for visitors seeking education and interpretation of the Battle of Monocacy, including Union and Confederate battle movements and artillery placements. It also provides connections to key battle points with trails, views, and reproduction artillery placement based on approximate battle movements. The selected alternative will also provide recreation-focused trails for visitors seeking hiking, biking and water trail experiences with interpretive elements. Alternative B includes the addition of trails that are accessible for all visitors, including the boardwalk replacement at Gambrill Mill (page 16 of EA), a path from the Thomas Farm parking area to the Tenant House (page 22 of EA), and a path across from the Worthington House to access waysides (page 22 of EA).

New trails include: the extension of the Junction Trail to create a loop at the Visitor Center (page 14 of EA); an extension of the trails at the Best Farm north to a high point and east along the CSX tracks to the 14<sup>th</sup> New Jersey Monument (page 15 of EA); a trail along the north side of the river between the 14<sup>th</sup> New Jersey Monument and I-270 (page 15 of EA); a trail loop at the Wallace Headquarters area (page 16); two trail loops south and east of Gambrill Mill (page 16 of EA); a trail connecting the Thomas Farm and Worthington Farm parking lots along or near Baker Valley Road (page 17 of EA); a trail on the Thomas Farm running along the old road bed of the former Georgetown Pike (page 22 of EA); a mown path parallel to the Ford Loop Trail (page 22 of EA); an addition to the loop at Brooks Hill (page 23 of EA); and a new trail at Lewis Farm (page 23 of EA). The existing paved and gravel access roads within the park that are designated for vehicles will continue to provide bicycle access. Wayfinding, interpretive

waysides, several additional parking spaces, and designated overflow parking areas are also incorporated into Alternative B.

The Plan's new physical connections include: a pedestrian bridge over the Monocacy River adjacent to the existing MD 355 bridge (page 13 of EA) with a trail linking Gambrill Mill and Thomas Farm underneath the existing steel truss bridge (page 15 of EA); a small pedestrian bridge over Bush Creek (page 16 of EA); a cantilevered crossing underneath the CSX bridge between Gambrill Mill and the Wallace Headquarters area (page 16 of EA); a potential pedestrian-only crossing of the Monocacy River appended to the existing I-270 bridge (page 15 of EA); and a pedestrian connection below I-270 linking the Worthington Farm and the Thomas Farm (page 17 of EA). In addition, the Plan includes a non-motorized craft launch (i.e., canoe, kayak) south of the CSX tracks on the east side of MD 355 (page 13 of EA) and a potential interpretive non-motorized craft pull-off along the Ford Loop (page 22 of EA). In the long-term, a potential new pedestrian land bridge over I-270 could also reconnect the Thomas and Worthington farms.

The Plan's new visual connections include reestablishing the views between and within the Worthington and Thomas farms by removing trees that have grown into the historically open viewshed. This work would be conducted in multiple phases over 10 to 20 years and would follow recommendations from the Thomas and Worthington Farms Cultural Landscape Report (2013). As a first phase, the Plan removes a limited number of trees obstructing views along the I-270 corridor, and some recently established trees from areas surrounding the two farms. Over time, future phases will remove additional trees and re-establish the full extent of the views between the two farms including the view to the Union Battery proposed along the old Georgetown Pike roadbed north of Thomas House. The Plan would expand these viewsheds to a point where a balance is met between the benefits to cultural resources and impacts to natural resources. This may result in tree removal to the full extent outlined in the Plan, or may be less. Phases also include removing trees from overgrown fencelines and line of trees within each farm's landscape to re-establish those historic views.

As part of each phase of tree removal, the project will implement a number of resource protection measures to avoid or minimize the degree and/or severity of impacts on cultural resources; wetlands, streams and water resources; and vegetation. This includes utilizing tree removal techniques, to the extent possible, that minimize soil disturbance; immediately planting low-growing vegetation, such as grasses and native shrubs, to minimize soil erosion; and treating exotic or invasive plants that may grow in cleared areas to assist with native plant establishment.

## **RATIONALE FOR DECISION**

The NPS selected Alternative B for implementation because it best supports the park's purpose, which is to preserve resources related to the Battle of Monocacy as well as commemorate and interpret the battle, as stated on page 1 of the EA, and to provide opportunities for visitors to understand and appreciate the significance of the battle. The NPS determined that Alternative B best meets the purpose and need of the Public Access Plan, as it provides opportunities that promote the public's access to and understanding of the battlefield, while continuing to provide for resource protection and management and minimizing adverse impacts on park resources.

## **MITIGATION MEASURES**

The selected alternative incorporates the mitigation measures listed in Appendix A of this document.

## **FINDING OF NO SIGNIFICANT IMPACT**

As documented in the EA the selected alternative has the potential for adverse impacts on historic buildings and structures, cultural landscapes, archeological resources, wetlands and water resources, vegetation, geology and soils, visitor use and experience, and NPS operations; however, the NPS has

determined that the selected alternative can be implemented without significant adverse effects, as defined in 40 CFR §1508.27.

Implementing the selected alternative has the potential to result in slight but detectable direct and indirect adverse impacts on historic buildings and structures, including earthworks, roads and bridges. These adverse impacts include the potential for direct impacts on earthworks and road traces from construction of visitor pedestrian access routes in proximity to them, and impacts on the MD 355 bridge from construction of a pedestrian bridge beside it. Other long-term incremental impacts, such as compaction and erosion from visitor foot traffic on earthen surfaces, could arise from increased visitor access to sensitive landscape structures such as earthworks and road traces. However, impacts on earthworks and road traces will be mitigated or minimized through compliance with CLR guidance, sensitive trail design, visitor education, monitoring for condition problems, repair in keeping with CLR guidance for historic character, and enforcement of resource protection. Impacts on the historic MD 355 bridge and views to/from it will be minimized by not changing the bridge materially, aligning the trusses and piers with the existing bridge trusses and piers, and using materials that are harmonious with the existing bridge materials. Each element of the selected alternative will be implemented in a way that meets the Secretary of the Interior's Standards for the Treatment of Historic Properties, and as implementation funding becomes available, each project will be subject to Section 106 consultation with Maryland Historical Trust.

Implementing new circulation features and the pedestrian bridge alongside MD 355 under the selected alternative will have noticeable incremental adverse impacts on cultural landscapes. However, new circulation features will be designed to be minimally visually intrusive and will comply with the *Secretary of Interior's Standards* related to cultural landscapes and with CLR guidance. In addition, some Plan improvements will implement CLR recommendations and reopen the view corridor across I-270 utilizing a phased approach, restoring an important historic view linking the two properties. In the long-term, the land bridge in the GMP could also be a beneficial impact for the cultural landscape by covering and restoring a similar topographic appearance in this area to the pre-I-270 landscape. As implementation funding becomes available, each project would be subject to Section 106 consultation with Maryland Historical Trust.

The selected alternative will add new trails and other improvements in a number of locations throughout the park during implementation. New trail locations will avoid known, documented archeological sites; however due to the high possibility of undocumented archeological resources throughout the park, the potential for adverse impacts on archeological resources exists due to the ground disturbance required to develop elements in the selected alternative. In order to minimize or mitigate the potential for adverse impacts, NPS will conduct an archeological survey for undocumented areas where ground disturbance is planned, to potentially include staging, after exact project footprints are identified and prior to any site work. While the implementation of the selected alternative has the potential to disturb currently undocumented archeological resources, mitigation measures will be taken to ensure impacts are minimized to the greatest extent practicable. As implementation funding becomes available, each project would be subject to Section 106 consultation with Maryland Historical Trust.

The selected action includes projects partially or entirely within wetlands or streams at four locations: Pedestrian bridge over Monocacy River at MD 355 overpass; Pedestrian bridge over Monocacy River at I-270 overpass; Gambrill Mill Boardwalk; and Pedestrian bridge over Bush Creek. Approximate temporary (less than 0.1 acre) and permanent (0.2 acres) disturbances were calculated using planning level data, representing less than one percent of all wetlands and streams within the boundaries of Monocacy National Battlefield. As planning and design for each project advances, the NPS will avoid suspected wetland areas to the extent possible. Temporary construction activities will adversely impact wetlands and streams due to disturbances, erosion and runoff. Through adherence to avoidance, minimization and compensation measures that will be identified for each of the projects that will disturb wetlands, the selected action will not result in noticeable long-term impacts on wetlands. Due to the anticipated limited nature of the project disturbance and water dependent nature of the activities, the

selected alternative elements were determined to be excepted actions under DO 77-1. Excepted actions do not require a Statement of Findings; however, DO 77-1 requirements to avoid wetlands and minimize unavoidable wetland impacts, to the extent practicable, still apply, along with the BMPs described in Appendix 2 of DO 77-1, and incorporated within the EA.

Construction-related activities related to trail construction and vegetation removal may adversely impact water resources and stormwater runoff water quality due to the erosion of exposed soils and corresponding downstream sedimentation, and potential to disturb bottom sediments and increase turbidity in the river during in-water construction related to the pedestrian bridges over the Monocacy River. Much of the trail disturbance will be limited to mown and earthen paths created with little excavation or additional impermeable surfaces. The NPS and/or its contractors will adhere to applicable best management practices during the construction of the projects included in the selected alternative to minimize the runoff of sediments and pollutants to the Monocacy River and other bodies of surface water at and in the vicinity of the battlefield. The phasing of the projects included in Alternative B over a period of 10 to 20 years will also minimize impacts on water quality from construction-related soil erosion. Thus, adverse construction-related impacts on water quality from the erosion of exposed soils and corresponding downstream sedimentation will be minimally noticeable, with no long-term impacts from erosion and sedimentation.

The selected alternative will have noticeable adverse construction-related and long-term impacts on vegetation. While vegetation disturbance along new trails of the area will result primarily in a change in ground cover, it will result in very little tree loss because many of the new trails will consist of mown paths through areas of existing grass and lawn. The restoration of the viewshed between the Thomas and Worthington Farms will occur in phases, with the first phase removing a limited number of obstructing trees along the I-270 corridor. Over time, future phases will remove additional trees and re-establish the full extent of the views between the two farms, which may result in removal of up to an estimated 33 acres of vegetation, including trees. The removal of vegetation in these areas will occur in phases over a 10 to 20 year period, and areas where vegetation is removed will be replanted with appropriate ground cover such as grasses and native shrubs. Tree removal could be mitigated in part by adding appropriate native tree plantings to enhance the riparian buffer areas within the park, but only after consideration of the cultural landscape and further Section 106 consultation.

The selected alternative will have no impacts on geology and barely noticeable short- and long-term adverse impacts on soils resulting from construction-related disturbance and erosion to construct approximately 8 miles of new pedestrian trails and improvements, and vegetation removal to re-establish viewsheds. Minimal impacts are due to the establishment of most new trails as mown paths through areas of lawn and grass that involve little earth disturbance, trail surfaces that will be primarily comprised of permeable surfaces, and the restoration of areas temporarily disturbed during construction to pre-project conditions following the completion of the project; thus, there will be no change in soil permeability or increase in soil erosion in those areas. In a number of cases, the establishment of new trails will be limited to maintaining a mowed path through areas of lawn and grass and would involve little or no earth disturbance. Short-term adverse impacts on soils will be mitigated through the use of applicable best management practices.

The selected alternative includes the construction of new elements within the park that will improve visitor access and connections to areas of the park, its resources and interpretive potential. These improvements will temporarily disrupt visitor access to certain trails or locations within the park during construction, resulting in temporary adverse impacts on visitor use and experience during construction; however, the impacts will be short-lived, within a site-specific area of the park, and phased over time.

Construction activities such as grading and excavation will temporarily alter facility management and disrupt NPS operations in the vicinity of the construction site by potentially limiting access to areas of the park, resulting in short-term adverse impacts. Construction will be dispersed across the park and phased over time (10-20 years), minimizing construction impacts. Following the construction period, the selected alternative will have noticeable adverse impacts on NPS operations due to long-term requirements

associated with the additional park facilities and the increased the number of facilities and land area that staff will need to patrol, maintain, preserve, and interpret. In addition, the addition of new circulation may increase visitor use of some of these existing circulation routes and increase visitation over time, resulting in a need for increased facility management. These elements will support the park's mission but also place additional burden on existing budgets and schedules, potentially without an increase in funding or staff.

## CONCLUSION

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA.

Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

Recommended:

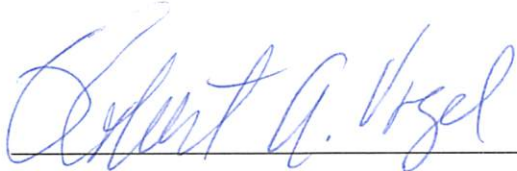


Christopher J. Stubbs  
Park Superintendent  
Monocacy National Battlefield  
National Capital Region

6/20/2017

Date

Approved:



Robert A. Vogel  
Regional Director  
National Capital Region

6/27/17

Date

Documents appended to the FONSI include:

- Appendix A: Mitigation Measures;
- Appendix B: Non-impairment determination;
- Appendix C: Response to public comments;
- Appendix D: Errata indicating any text changes to EA; and
- Appendix E: Section 106 coordination letters

## APPENDIX A: MITIGATION MEASURES

### CULTURAL RESOURCES

- When planning or undertaking any project that could affect cultural landscapes, comply with the recommendations in the relevant CLRs and incorporate the guidance into the project design.
- If no CLR has been completed, consider a project-specific cultural landscape assessment to identify the best approach to preserve and maintain park landscapes (for example, the battlefield at large has not been documented in a CLR, only some of its component landscapes).
- Continue to undertake research and documentation of historic buildings and cultural landscapes in the park and develop comprehensive guidance for their preservation and treatment (reports could include Historic Structures Reports, Cultural Landscape Inventories, and CLRs).
- For any proposed project that may affect historic buildings or cultural landscapes, consult with MD SHPO and other parties both informally and formally as part of Section 106 compliance.
- All new construction in the vicinity of historic buildings, structures, or landscapes should be undertaken according to NPS policy, in compliance with the *Secretary of Interior Standards for the Treatment of Historic Properties*.
- Conduct an archeological survey for undocumented areas where ground disturbance is proposed after exact project footprints are identified and prior to any site work.
- If NRHP-eligible archeological resources are present, define the appropriate avoidance, minimization and mitigation measures to be taken.
- An earthworks management plan could be completed to document the earthworks and surrounding landscape, which may contain surface or subsurface resources related to the major earthworks, such as artifacts or smaller foxholes, etc. Such a plan would also provide guidance for vegetative cover, erosion management, visitor access strategies, and interpretation that would sustain and protect the earthworks while accommodating visitor access to the area.

### NATURAL RESOURCES

- Avoid suspected wetland areas to the extent possible. In areas where wetland avoidance is not possible, delineate wetland boundaries and establish limits of disturbance to minimize impacts on wetlands.
- Coordinate with applicable regulatory agencies, including the U.S. Army Corps of Engineers and the Maryland Department of Natural Resources to develop a site-specific mitigation plan identifying how areas disturbed during construction would be restored to pre-construction conditions.
- Adhere to best management practices (BMP) to minimize vegetation disturbance, erosion and runoff that could result in the sedimentation and pollution of downstream watercourses.
- Establish limits of disturbance for each project during detailed planning and design to minimize disturbance of the 100-year floodplain to the extent practicable.
- For projects involving one or more acres of earth disturbance, obtain coverage under Maryland's General Permit for Stormwater Associated with Construction Activity (General Permit), which would require the preparation of an erosion and sediment control plan.
- Adhere to BMPs for the state-listed threatened Allegheny Pearl Dace for all ground-disturbing activities.
- Incorporate new northern long-eared bat survey information into park planning and management decisions and adhere to a time of year and distance restrictions for tree removal, updating best practices as guidance evolves.

- Tree removal for the restored view between the Thomas and Worthington farms would have a beneficial impact to the cultural landscape but an adverse impact to natural resources. A potential mitigation action would be adding appropriate native tree plantings to enhance the riparian buffer areas within the park. Tree planting areas should be selected for their natural resource value as well as avoid areas of historically important open fields and views as documented in the CLRs for the park.
- Utilize tree removal techniques, to the extent possible, that minimize soil disturbance and immediately plant low-growing vegetation, such as grasses and native shrubs, to minimize soil erosion and encourage native groundcover.
- Treat exotic or invasive plants that may grow in cleared areas to assist with native plant establishment.



## APPENDIX B: NON-IMPAIRMENT DETERMINATION

NPS Management Policies 2006 require an analysis of potential effects to determine whether or not actions would impair park resources. Section 1.7, 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.”

According to *NPS Management Policies, 2006*, Section 1.4.5, *What Constitutes impairment of Park Resources and Values*, 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.” It also states that 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 park’s establishing legislation;
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- identified in the park’s management plan or other relevant NPS planning documents as being of significance.

An impact would be less likely to constitute an 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.

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 (EAs) or environmental impact statements (EISs) 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.

The NPS' threshold for considering whether there could be impairment is based on whether an action will have significant effects.

*NPS 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 relating to the decision."

This determination on impairment has been prepared for the preferred alternative described in Chapter 2 of the Monocacy National Battlefield Public Access Plan EA. Impairment findings are not necessary for visitor use and experience 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. An impairment determination is made for all other resource impact topics analyzed for the preferred alternative.

### **Historic Buildings and Structures**

The Monocacy Battlefield historic district includes a variety of contributing buildings, sites, structures, and objects (the district as a whole is considered under Cultural Landscapes). The preferred alternative has the potential to result in slightly detectable direct and indirect adverse impacts on historic buildings and structures, including earthworks, roads and bridges. This includes the potential for direct impacts on earthworks and road traces from construction of visitor pedestrian access routes in proximity to them; and impacts on the MD 355 bridge from construction of a pedestrian bridge beside it. Other long-term incremental impacts, such as compaction and erosion from visitor foot traffic on earthen surfaces, could arise from increased visitor access to sensitive landscape structures such as earthworks and road traces.

While the preferred alternative would result in incremental adverse and beneficial impacts on historic buildings and structures, elements would be implemented in a way that meets the Secretary of the Interior's Standards for the Treatment of Historic Properties and in keeping with CLR guidance. As implementation funding becomes available, each project would be subject to Section 106 consultation with the Maryland Historical Trust. Therefore, there will be no impairment to the park's resources related to historic buildings or structures because no major, long-term, adverse impacts to those resources would occur from implementation of the preferred alternative.

### **Cultural Landscapes**

Cultural landscapes at the park include the battlefield as a whole, and specific farmsteads in particular. The Monocacy Battlefield NRHP historic district includes a variety of contributing buildings, sites, structures, objects, landscape features and characteristics that together add up to form the eligible district. Cultural landscapes include component landscapes as documented in CLIs and CLRs, and landscape elements (sites) that contribute to districts located within the park. The former ferry crossing and associated vicinity is not a separate cultural landscape, but is considered part of the overall battlefield landscape associated with the 1864 engagement.

The addition of new circulation features and the pedestrian bridge alongside MD 355 under the preferred alternative would have noticeable incremental adverse impacts on cultural landscapes. However, new circulation features would be sensitively sited and designed to be minimally visually intrusive and would comply with the Secretary of Interior's Standards related to cultural landscapes and with CLR guidance. In addition, some preferred alternative improvements would implement CLR recommendations, and reopen the view corridor across I-270 in multiple phases, restoring an important historic view linking the Worthington and Thomas properties and resulting in beneficial impacts. In the long-term, the land bridge in the GMP could also be a beneficial impact for the cultural landscape by covering and restoring a similar topographic appearance in this area to the pre-I-270 landscape.

Overall, the preferred alternative would have a noticeable beneficial impact and incremental adverse impact on the cultural landscapes of Monocacy National Battlefield. As implementation funding becomes available, each project would be subject to Section 106 consultation with the Maryland Historical Trust. The adverse impacts would not diminish the integrity of the cultural landscape and would enhance opportunities for enjoyment of the cultural landscapes within the park. Therefore, there will be no impairment to the park's resources related to cultural landscapes because no major, long-term, adverse impacts to those resources would occur from implementation of the preferred alternative.

### **Archeological Resources**

Archeological resources in the park are those associated with both temporary and permanent settlements (historic and prehistoric), and with short- and long-term military uses. There are several documented archeological sites within the park, including a National Register-listed archeological site, L'Hermitage. Various sites have also been identified as part of CLIs, CLRs, and other studies in the past. However, a complete archeological survey of the park has not been undertaken and the studies completed are not considered comprehensive. Therefore, the possibility of undocumented archeological resources exists throughout the park.

The preferred alternative would avoid known, documented archeological sites; however due to the possibility of undocumented archeological resources throughout the park, there is potential for adverse impacts on archeological resources due to the ground disturbance required to develop elements in the preferred alternative. In order to minimize or mitigate the potential for adverse impacts, NPS would conduct an archeological survey for undocumented areas where ground disturbance is planned after exact project footprints are identified and prior to any site work. If NRHP-eligible archeological resources are present, NPS would define appropriate avoidance, minimization, or mitigation measures to be taken.

While the preferred alternative has the potential to disturb currently undocumented archeological resources that would result in long-term adverse impacts, mitigation measures would be taken to ensure impacts are minimized to the greatest extent practicable. As implementation funding becomes available, each project would be subject to Section 106 consultation with the Maryland Historical Trust. Due to the ongoing consultation and consideration of archeological resources and because no major, long-term, adverse impacts to those resources would occur from implementation of the preferred alternative, it will not result in impairment of park resources.

### **Wetlands and Streams**

Within the boundaries of the park, wetlands and streams comprise approximately 113 acres and include the Monocacy River, Bush Creek and Harding's Run as well as their associated wetlands. Some of these wetlands and streams have been field verified, while other approximate extents and locations are based on data produced by U.S. Fish and Wildlife Service's National Wetlands Inventory.

The preferred alternative would include projects partially or entirely within wetlands or streams. Approximate temporary (less than 0.1 acre) and permanent (0.2 acres) disturbances were calculated using planning level data, representing less than one percent of all wetlands and streams within the boundaries of the park. As planning and design for each project advances, the NPS would avoid suspected wetland areas to the extent possible. Temporary construction activities would adversely impact wetlands and streams due to disturbances, erosion and runoff. Through adherence to avoidance, minimization and compensation measure, the preferred alternative would not result in noticeable long-term impacts on wetlands. Therefore, there will be no impairment to the park's resources related to wetlands and streams because no major, long-term, adverse impacts to those resources would occur from implementation of the preferred alternative.

## **Water Resources**

An approximately 2-mile-long segment of the Monocacy River flows through and adjacent to portions of Monocacy National Battlefield, and several tributaries of the Monocacy River are located within the boundaries of the park.

Construction-related under the preferred alternative may adversely impact water resources and water quality due to the erosion of exposed soils and corresponding downstream sedimentation, and potential to disturb bottom sediments and increase turbidity in the river during in-water construction related to the pedestrian bridge over the Monocacy River. However, much of the trail disturbance would be limited to mown and earthen paths created with little excavation or additional impermeable surfaces. Adherence to applicable best management practices during the construction of the projects would minimize the runoff of sediments and pollutants to the Monocacy River and other bodies of surface water at and in the vicinity of the park. The phasing of the projects included in Alternative B over a period of 10 to 20 years would also minimize impacts on water quality from construction-related soil erosion. Thus, adverse construction-related impacts on water quality from the erosion of exposed soils and corresponding downstream sedimentation would be minimally noticeable, with no long-term impacts from erosion and sedimentation. Therefore, the preferred alternative will not result in impairment of park resources related to water resources because no major, long-term, adverse impacts to those resources would occur from implementation of the preferred alternative.

## **Vegetation**

The types and patterns of vegetation at the park are representative of the natural and agricultural landscape in Maryland's Piedmont region. Agricultural lands cover about 700 acres or 42 percent of the park and include crops and pastures for grazing livestock. Approximately 346 acres, or 21 percent of the battlefield is forested. Generally, upland and riparian forested areas are interspersed with agricultural lands and open fields throughout the battlefield. It is estimated that one-third of plants at the park are non-native, particularly in non-agricultural areas of the battlefield.

As part of the implementation of the preferred alternative, it is conservatively estimated that approximately 8 acres of vegetation would be disturbed by the construction of new trails; however, the vegetation disturbance along new trails of the area would result primarily in a change in ground cover, it would result in very little tree loss because many of the new trails would consist of mown paths through areas of existing grass and lawn. In addition, the restoration of the viewshed between Thomas and Worthington Farms would occur in phases, with the first phase removing a limited number of obstructing trees along the I-270 corridor. Over time, future phases would remove additional trees and re-establish the full extent of the views between the two farms, which could result in removal of up to an estimated 33 acres of vegetation, including trees. Areas where vegetation is removed would be replanted with appropriate ground cover such as grasses and native shrubs. The removal and management of vegetation in these areas and their restoration with low-growing, appropriate vegetation would be consistent with NPS policies to maintain the cultural landscape.

In the context of Monocacy National Battlefield, the amount of vegetation that would be disturbed or removed through implementation would be noticeable. Invasive species would be removed from the site. Additionally, trees would be replaced in accordance with NPS's tree mitigation policies. There will be no impairment to the park's resources related to vegetation because no major, long-term, adverse impacts to those resources would occur from implementation of the preferred alternative.

## **Geology and Soils**

Implementation of the preferred alternative would disturb approximately 41 acres of soils, including up to approximately 33 acres due to a phased removal of vegetation to re-establish historic views. While construction-related activities would temporarily increase the potential for erosion, the preparation and implementation of an erosion and sediment control plan and Maryland's General Permit for Stormwater Associated with Construction Activity (General Permit) would minimize the short-term impacts and would not harm the long-term integrity of the soils in the project area. Following the completion of each

project, soils disturbed during construction but not developed or otherwise built on would be revegetated or otherwise stabilized, thereby ensuring that soils would not remain exposed to erosive forces. Surfaces for the proposed paths would consist of either mown paths or permeable materials that would allow the percolation of water into underlying soils; thus, no substantial areas of compacted soils or impermeable surface would be created as a result of the preferred alternative. Adverse impacts on soils resulting from the preferred alternative would be barely noticeable in the long term. Short-term adverse impacts would be mitigated through the use of applicable best management practices. Therefore, there will be no impairment to the park's resources related to geology and soils because no major, long-term, adverse impacts to those resources would occur from implementation of the preferred alternative.

## APPENDIX C: PUBLIC COMMENT RESPONSES<sup>1</sup>

	Comment	Response
<b>Cumulative impact projects</b>	<p>The MDOT has also identified long-term needs for I-270 and MD 355. These future plans for I-270 include alternatives that could have impacts to the Park. The MDOT had studied different alternatives in the I-270 Multi-modal study, but the study went on-hold for financial considerations before a preferred alternative was selected. As the public access plan references, any I-270 widening through this area would likely include mitigations to park impacts including the potential for the addition of park access improvements that are referenced in the NPS public access plan. Future plans for MD 355 do not include additional lanes through this stretch. The final scope and scale of the impacts to the Monocacy National Battlefield would be determined once these studies progressed in project planning and design with future coordination with the NPS, however, both remain unfunded at this time. We are requesting that the above plans be acknowledged under the Cumulative Impacts Methodology on pages 25-28.</p>	<p>Projects that are included for cumulative impact analysis are past, present, and reasonably foreseeable future actions. Due to the speculative nature of the unfunded MD355 and I-270 projects, these projects were not included in the cumulative impact discussion. NPS will continue ongoing coordination with the Maryland Department of Transportation regarding actions around the park.</p>
	<p>The Maryland Department of Transportation's State Highway Administration (SHA) is currently undertaking a project to study, design, and construct innovative improvements to reduce congestion in the I-270 corridor between I-495 (Capitol Beltway) and I-70 in Frederick. The proposals are being evaluated and a team should be named soon that will implement the most innovative and cost effective ideas. The project is budgeted for \$100 million and could begin construction within the next two years and is likely to include elements along the stretch through the Monocacy Battlefield National Park. It is unlikely that there will be any construction outside the existing right-of-way.</p>	<p>Projects that are included for cumulative impact analysis are past, present, and reasonably foreseeable future actions. Due to the speculative nature of the project, it was not included in the cumulative impact discussion. NPS will continue ongoing coordination with the Maryland Department of Transportation regarding actions around the park.</p>

<sup>1</sup> See the Final Monocacy National Battlefield Public Access Plan EA Public Comment Report for full text of the comments received.

	Comment	Response
<b>BMPs</b>	<p>There are several areas in the EA which affirm that BMPs will be employed, however no detail on what these practices will include is provided. We recommend that additional information on proposed BMP's be included in the final EA, as it was for the minimization of construction impacts. Specifically, BMPs mentioned for vegetation disturbance (p. 42) and soil disturbance (p. 53) should be elaborated upon. Additionally, possible options for site specific mitigation plans could be mentioned briefly in the EA to present reasonable alternatives and expedite the mitigation process later on.</p>	<p>The planning level of the Public Access Plan does not currently provide enough detailed information to develop site-specific mitigation plans and best management practices. However, all measures will occur consistent with NPS policy and resource management guidance, along with state and federal regulations.</p>
<b>Suggestions for Alternative B</b>	<p>It is not clear how pedestrians will cross MD 355 at the Visitors Center. MD 355 is not conducive to an at-grade pedestrian crossing in this area.</p>	<p>The park recognizes that the pedestrian connection included in the Plan across MD 355 at the Visitor Center is not feasible under current roadway conditions; however it was included in the Plan to describe a connection the park would want to explore with Maryland State Highway Administration and others should the MD355 highway conditions change in the future.</p>
	<p>In constructing hiking paths, I would advocate that true trails (or their equivalent) be established. At the present time, the so-called "trail" at the Thomas Farm consists of a road out past the barn. Within the last 2 weeks, I had to get off that "trail" to make way for an NPS vehicle - why is that even a possibility? Trails are for people.....Again, hikers should not expect to have to share "trails" with vehicles.</p>	<p>Comment noted. The Plan includes pedestrian access on gravel roads as the impact to resources to construct a parallel hiking trail would be greater than the limited number of times a visitor would encounter a vehicle on a gravel road.</p>
	<p>EPA understands the desire to establish viewsheds between historical sites. The proposed project's removal of trees includes 41 acres of soils and/or vegetation disruption (p. 18-20). EPA suggests NPS consider that a visual relationship could be established, for example, between the Thomas and Worthington Farms, with less clearing than proposed. As mentioned in the EA, best management practices (BMPs) should be employed to minimize erosion and run-off of sediments and pollutants to the Monocacy</p>	<p>The work to reestablish viewsheds would be conducted in multiple phases over 10 to 20 years. As a first phase, the Plan would remove a limited number of obstructing trees along the I-270 corridor, and some recent trees from areas surrounding the two farms. Over time, future phases would remove additional trees and re-establish the full extent of the views within the park. The Plan would expand these viewsheds to a point</p>

Comment		Response
	River which EPA supports. In addition to BMPs, minimizing the number of cleared trees would ensure that soils do not erode significantly on the site (p. 45). EPA supports the phasing of any clearing to occur over 10 to 20 years and encourages the planting of native species in the riparian buffer area as discussed (p. 49); we also encourage the NPS to explore alternatives to clear cutting to reduce environmental disturbance.	where a balance is met between the benefits to cultural resources and impacts to natural resources. This may result in tree removal to the full extent outlined in the Plan, or may be less.
Impact topics	The impact on minority populations does come into play here as one notes the discovery of the slave community (in an area that will experience new trails, possibly). Thus a historic National Park unit that INCLUDES this history also includes minority population as stakeholders.	The EA considered the potential for the project to disproportionately impact minority or low-income populations, as described on page 6. Federal agencies are directed to include an Environmental Justice analysis to determine whether current populations living in the vicinity of a project area could be disproportionately affected by the proposed action. Because all actions are being carried out within the park's administrative boundaries and no populations were identified as disproportionately impacted by the Public Access Plan, the topic was dismissed from further study in the EA.
	EPA suggests that NPS consider resiliency in the EA. The EA alternatives analysis should, as appropriate, consider practicable changes to the proposal to make the site more resilient to potential future weather and climate fluctuations. It is suggested that the Proposed Action consider future climate scenarios and weather events from the National Climate Assessment (NCA). The U.S. Global Change Resource Program released the Third National Climate Assessment, a comprehensive report on climate change and its impacts in the United States. For more information, please visit: <a href="http://nca2014.globalchange.gov/">http://nca2014.globalchange.gov/</a> . Any assessment done to identify climate trends and sustainable design should be mentioned in the NEPA analysis and design or construction commitments brought into a final document.	The planning level of the Public Access Plan does not currently provide enough detailed information to develop site-specific resilient designs. However, future design development for Public Access Plan projects will consider, where appropriate, climate scenarios and resilient design measures, consistent with NPS policy on climate change.



	Comment	Response
<b>Natural resources</b>	<p>My only criticism is in regards to the 33 acres of forested land that would be cleared to improve the viewshed between Worthington and Thomas Farm. I have on two separate occasions observed fishers in the wooded area along the trail southwest of the Worthington Farm building. Clearing the trees as proposed would likely impact the fisher population there. While not a RTE species, it is not overly common in this part of Frederick County and it would be a shame to lose it here.</p>	<p>The National Capital Region Wildlife Biologist confirmed that fishers have not been officially documented in the park. In addition, the removal of trees in that area between Worthington Farm and Thomas Farm would not adversely impact any potential fisher habitat as there would be sufficient, abundant, adjacent habitat in the forested area to the south and southwest of the Worthington House.</p>
	<p>The EA mentions that an estimated 0.2 acres of wetlands and streams would be permanently impacted from the installation of footings, pilings, and/or other structural elements associated with the proposed pedestrian bridges as well as trails, ramps and other approach elements that pedestrians would use to access the bridges. Although this is a small percent of the total wetland and stream area in the battlefield boundary, the EA would benefit from a discussion of considerations evaluated to minimize impacts to streams and wetlands. The Alternative B section of the EA does not appear to include this information. It would be helpful to identify if wetland delineation will be done to determine 'limits of disturbance' to wetlands (p. 42). Please consider any further avoidance and minimization of impacts to aquatic resources that can be achieved through design and construction.</p>	<p>As noted on page 42, design development to avoid wetlands and streams as well as the estimates of disturbances resulting from proposed projects are based on planning level information that will be refined as the design and engineering of the projects advances.</p> <p>Through future, more detailed and advanced design documentation processes, NPS will further seek to minimize impacts to aquatic resources, in keeping with NPS guidance and adherence to the Maryland Nontidal Wetlands Protection Act.</p> <p>NPS staff will review and approve the designs at various project milestones. Should the design vary from what is presented in the EA, NPS will determine whether the design can be modified to what was originally presented. If not possible, NPS would have to consider additional NEPA compliance, as well as other federal and state permitting agencies. Throughout the design process, NPS will seek ways to minimize impacts to wetland resources.</p>
<b>Park boundary</b>	<p>Frederick County DPR Comment: "On Figure 11 (page 12) and Figure 22 (page 22) the maps indicating National Park Service's boundary has also included a parcel of land that is owned and managed by the Frederick County Division of Parks and Recreation (Parcel 0059, Map 0086, Grid 0010 - Tax</p>	<p>The boundary shown on maps in the Plan is the park's legislative boundary, which includes the referenced parcel. The boundary is not showing the land NPS owns in fee. In addition to the referenced parcel, there are also other parcels within the legislative boundary</p>

Comment		Response
	Account #1128540183). The parcel in question is 59.93 acres in size and is located on the north side of the Monocacy River and to the west of the Intersection 270 bridge.	that are not under NPS fee simple ownership.
<b>Comments for or against Alternative B</b>	Eighteen commenters expressed support for Alternative B.	Comments noted.
	<p>One commenter expressed concerns regarding the preferred alternative's selection and implementation. The commenter is concerned that the alternative focuses too much on recreation and is therefore not in line with the park purpose or its natural, historic and cultural contexts, and requested another alternative be developed that is in line with the park's purpose to enhance the battlefield experience and the natural, historic and cultural contexts in which it occurred.</p> <p>In addition, the commenter expressed concern regarding the potential impacts, as described in the EA, to cultural and archeological resources, and NPS operations. The commenter notes that a complete archeological survey of the park hasn't been completed and questions whether an archeologist is included on the planning team. The commenter also questions how an increase in NPS operations could be accommodated with the current hiring and budget cutbacks.</p>	<p>As part of the Public Access Plan, the NPS determined that Alternative B best meets the purpose and need of the project in order to both provide opportunities that promote the public's access to and understanding of the battlefield, while continuing to provide for resource protection and management. The park is managed to accommodate multiple uses, including some recreational use. Alternative B in the Public Access Plan helps to provide a balance between those uses.</p> <p>The National Capital Region Cultural Resources division and the Maryland State Historic Preservation Officer, both with archeologists on staff, were integrally involved in the planning process from scoping to the present.</p> <p>In addition, as part of ongoing NHPA Section 106 consultation, each project, as it is being considered for implementation, will be evaluated for its potential for adverse effects to historic properties, including archeological resources.</p> <p>During further design development and implementation, NPS operational capacity will be reviewed to minimize adverse impacts to operations and maintenance.</p>

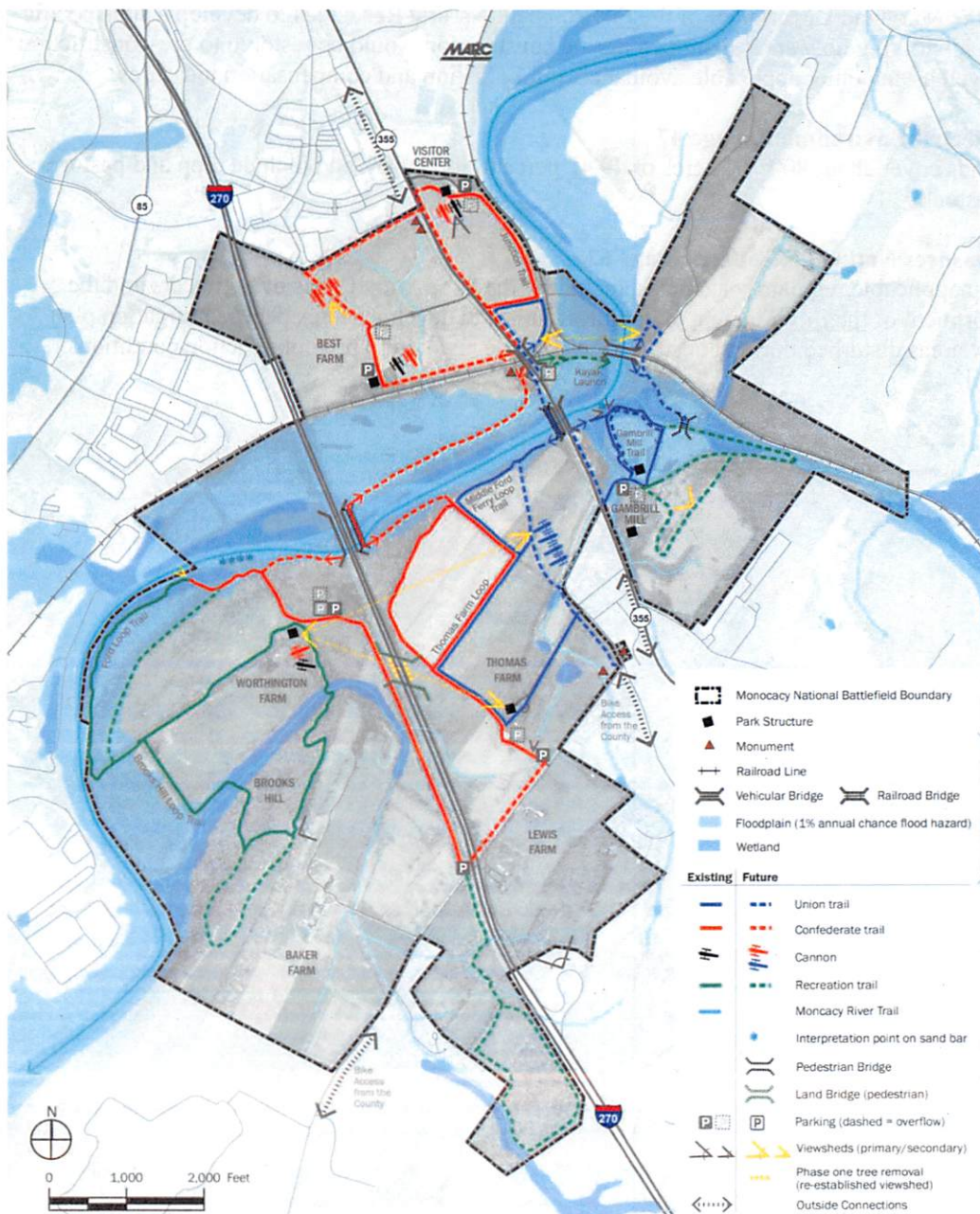
## APPENDIX D: ERRATA

### PUBLIC ACCESS PLAN MONOCACY NATIONAL BATTLEFIELD ENVIRONMENTAL ASSESSMENT – ERRATA

The following changes have been made to the *Monocacy National Battlefield Public Access Plan Environmental Assessment* (January 2017) Finding of No Significant Impact (FONSI) to correct minor statements of fact and update information. Additions to the text are identified by underlines and deletions are marked by ~~strikeout~~ unless otherwise noted.

#### Alternative 2, Figure 11, Page 12

As described in the Cumulative Impact Projects in Table 1 on page 26, the Maryland State Highway Administration project to replace the MD 355 bridge would close the access road to the 14<sup>th</sup> New Jersey Monument along the west side of MD 355 and parking would be provided on the east side of MD 355. Figure 11 (below), was revised remove the parking symbol on the west side of MD 355.



**Wetlands and Streams Affected Environment, Page 41**

Activities that would potentially disturb wetlands and streams are regulated under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act. Such activities may require a permit from regulatory agencies including the U.S. Army Corps of Engineers. Within the boundaries of Monocacy National Battlefield, wetlands and streams comprise approximately 113 acres and include the Monocacy River, Bush Creek and Harding's Run as well as their associated wetlands. The Maryland Nontidal Wetlands Protection Act (Environment Article Title 5, Subtitle 5-901 through 5-911, Annotated Code of Maryland) requires a state nontidal wetlands permit or letter of authorization from the Maryland Department of the Environment, Nontidal Wetlands & Waterways Division for activities in nontidal wetlands or within 25-foot nontidal wetland buffer or 100-foot expanded buffer. The applicant has to demonstrate that a regulated activity, which is not water-dependent, has no practicable alternative, minimized alteration or impairment of the nontidal wetlands, and will not cause or contribute to a degradation of ground or surface waters.

**Wetlands and Streams Impacts of Alternative B, Page 42**

The NPS would coordinate with applicable regulatory agencies, including the U.S. Army Corps of Engineers and the Maryland Department of the Environment ~~Natural Resources~~ to develop a site-specific mitigation plan identifying how areas disturbed during construction would be restored to pre-construction conditions, as well as any other applicable avoidance, minimization and compensation measures.

**Vegetation Affected Environment, Page 47**

Agricultural lands cover about ~~800~~ 700 acres or ~~49~~ 42 percent of the park and include crop and pastures for grazing livestock.

**Mitigation Measures Natural Resources, Page 62**

Coordinate with applicable regulatory agencies, including the U.S. Army Corps of Engineers and the Maryland Department of the Environment ~~Natural Resources~~ to develop a site-specific mitigation plan identifying how areas disturbed during construction would be restored to pre-construction conditions.

## APPENDIX E: SECTION 106 COORDINATION LETTERS



IN REPLY  
REFER TO:

### United States Department of the Interior

NATIONAL PARK SERVICE  
Monocacy National Battlefield  
4632 Araby Church Road  
Frederick, MD 21704

September 16, 2015

Maryland Historical Trust  
Attn.: Mr. Jonathan Sager  
State Historic Preservation Officer  
100 Community Place, 3<sup>rd</sup> Floor  
Crownsville, Maryland 21032-2023

Subject: Monocacy National Battlefield Public Access Plan and Environmental  
Assessment—Section 106 Consultation

Dear Mr. Sager:

The National Park Service (NPS) is preparing a Public Access Plan and corresponding Environmental Assessment (EA) for Monocacy National Battlefield. The NPS is formally initiating consultation for this project with the Maryland State Historic Preservation Officer (SHPO), in accordance with 36 CFR 800.3 of Section 106 of the National Historic Preservation Act.

The 1,647-acre Monocacy National Battlefield, located in Frederick County, Maryland, encompasses most of the lands upon which the Battle of Monocacy was fought. The site is listed in the National Register of Historic Places and is designated as a National Historic Landmark. Six properties or farmsteads that existed during the battle are still extant within the national battlefield and retain essentially their Civil War era landscape appearance, and surrounding agricultural fields retain the feel of the Civil War era landscape and overall agricultural environment.

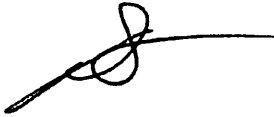
The NPS is developing an EA for the Public Access Plan in accordance with the National Environmental Policy Act (NEPA). The Public Access Plan will look comprehensively at the battlefield's public access to park areas and resources in order to increase opportunities for visitors to connect to the park's resources, history, preservation, and significance. The Public Access Plan will evaluate current park facilities and resources, engage stakeholders, explore the feasibility of ways to enhance internal circulation and access, and evaluate connectivity to the surrounding community.

The NPS will develop an Assessment of Effect for this project as a separate, but parallel process to the EA. However, at this early stage, we are unable to propose either an area of potential effect or to make any determination of effect. We are planning to consult with the public per 800.3(e) in public meetings and through our Planning, Environment, and Public Comment website ([www.parkplanning.nps.gov](http://www.parkplanning.nps.gov)). We anticipate that these outreach efforts will accommodate the requirements of both NEPA and the Section 106 processes.

A copy of the EA and the Assessment of Effect will be provided to your office for review when it becomes available, and we anticipate further consultation with your office as mandated by Section 106.

We look forward to working with you on this project. If you have any questions, please do not hesitate to contact Andrew Banasik at (301) 696-0130 or via email ([andrew\\_banasik@nps.gov](mailto:andrew_banasik@nps.gov)).

Sincerely,

A handwritten signature in black ink, appearing to be "Rick Slade", with a long horizontal line extending to the right.

Rick Slade  
Superintendent  
Monocacy National Battlefield

Enclosure:    Proposed Project Area  
                  Regional Context Map





IN REPLY  
REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE  
Monocacy National Battlefield  
4632 Araby Church Road  
Frederick, MD 21704



January 26, 2017

Elizabeth Hughes  
Director/State Historic Preservation Officer  
Maryland Historical Trust  
100 Community Place, 3<sup>rd</sup> Floor  
Crownsville, Maryland 21032-2023

Subject: **Monocacy National Battlefield Public Access Plan, Environmental Assessment  
and Assessment of Effects**

FR 6.

Dear Ms. Hughes:

The National Park Service's (NPS) Monocacy National Battlefield has prepared an Environmental Assessment (EA) and Assessment of Effects (AOE) to analyze the potential impacts of two alternatives, including a no-action alternative, for the proposed Monocacy National Battlefield Public Access Plan (Plan). Enclosed, please find a copy of the Plan and EA, and the Assessment of Effects.

The purpose of the Monocacy National Battlefield Public Access Plan and EA is to develop a comprehensive plan that promotes the public's access to and understanding of the battlefield in order to enhance the visitor experience and increase opportunities for visitors to connect with the park's resources, history, commemorative aspects, preservation activities, and significance, while minimizing impacts to cultural and natural resources.

The Plan and EA are being released to the public for a 30-day review period from January 27 to February 28, 2017. Following the review period and analysis of public comments, a decision document will be released.

As a federal undertaking, the project is subject to historic preservation consultation in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. Because the park is part of a National Historic Landmark (NHL) district, it is also subject to review under the National Historic Preservation Act.

On September 16, 2015, the National Park Service (NPS) wrote to formally initiate Section 106 consultation with your office for the Monocacy National Battlefield Public Access Plan and Environmental Assessment (EA). Due to the early stage of the project, NPS did not make any determination of effect. Following development of the Plan and EA, ongoing consultation on the project, and development of an Assessment of Effects, NPS now has sufficient information to make a formal determination.

1

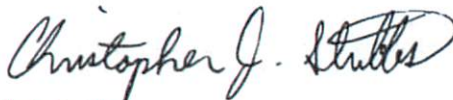
EX  
2NA  
3/13/17

NSL  
2NA  
2/7/17

NPS has concluded that while the implementation of individual elements of the Public Access Plan has the potential to result in direct and indirect adverse effects to the historic resource or its contributing features; if each element is implemented in a way that meets the Secretary of the Interior's Standards for the Treatment of Historic Properties, the net result will be no adverse effect. Since the NPS has a nationwide Programmatic Agreement and works closely with the Maryland State Historic Preservation Officer to implement projects that may adversely affect historic properties, the NPS has determined that the adoption of the Public Access Plan (Alternative B) will have no adverse effect on historic properties conditioned upon the fact that, as laid out in the 2008 NPS Programmatic Agreement, each element of the Plan as it is implemented will undergo consultation. As funding becomes available to implement the Plan, each project would be subject to Section 106 consultation with Maryland Historical Trust, some of which may be undertaken as outlined in the NPS nationwide Programmatic Agreement.

The NPS seeks your concurrence with our effects finding as summarized above and detailed in the enclosed AOE. We look forward to receiving your continued input on this project. If you have any questions, please do not hesitate to contact Andrew Banasik at (301) 696-0130 or via email ([andrew\\_banasik@nps.gov](mailto:andrew_banasik@nps.gov)).

Sincerely,



Chris Stubbs  
Superintendent  
Monocacy National Battlefield

I concur that the above-described project will not have an adverse effect on historic properties located upon Monocacy National Battlefield. \*

  
State Historic Preservation Officer

3/13/2017  
Date

Enclosures: Monocacy National Battlefield Public Access Plan and Environmental Assessment, Assessment of Effects

\* We look forward to further consultation with NPS and other involved parties to complete the Section 106 review of future undertakings once NPS implements the plan. We appreciate NPS's proposed sensitive treatments for the pedestrian bridge crossing adjacent to MD 355.