

**National Park Service
U.S. Department of the Interior**

**Parkland Adjacent to the Intelligence Community Campus-Bethesda
Montgomery County, Maryland**



Assessment of Effects
Cultural Resources Technical Memorandum

George Washington Memorial Parkway Parkland Restoration Plan

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1. INTRODUCTION

The National Park Service (NPS) is developing a Parkland Restoration Plan to improve drainage and resolve sedimentation issues on parkland downstream of the Intelligence Community Campus-Bethesda (ICC-B) in Bethesda, MD. The project area is located on federal land adjacent to the western side of the ICC-B site, which is owned by the Office of Director of National Intelligence (ODNI). The proposed project is a result of an agreement between ODNI and the NPS to address erosion and sedimentation on parkland..

As a federal undertaking, the project is subject to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulations (36 Code of Federal Regulations [CFR] Part 800) "Protection of Historic Properties" (Section 106). This technical memorandum has been prepared as part of the continuing consultation between the NPS and the Maryland State Historic Preservation Office (SHPO). Section 106 consultation for the Parkland Restoration Plan was initiated with SHPO in a letter dated January 26, 2018; the SHPO replied in a letter dated February 26, 2018 (**Appendix A**).

In support of the Parkland Restoration Plan, the NPS has developed this Technical Memorandum to document the presence of historic properties, defined as those that are listed or eligible for listing in the National Register of Historic Places (NRHP) for the purposes of Section 106 review. Identification of historic buildings, structures, sites, objects, districts, and cultural landscapes was undertaken within the Area of Potential Effect (APE) established for this project. The NPS consulted with SHPO and interested parties regarding the APE. Work was directed and conducted by staff that meet the *Secretary of the Interior's Professional Qualification Standards* (36 CFR Part 61) in the disciplines of Historical Landscape Architecture, Architectural History and History.

As part of the National Environmental Policy Act (NEPA) process, the NPS developed one action alternative for the Parkland Restoration Plan. The focus of this memorandum is on this action alternative.

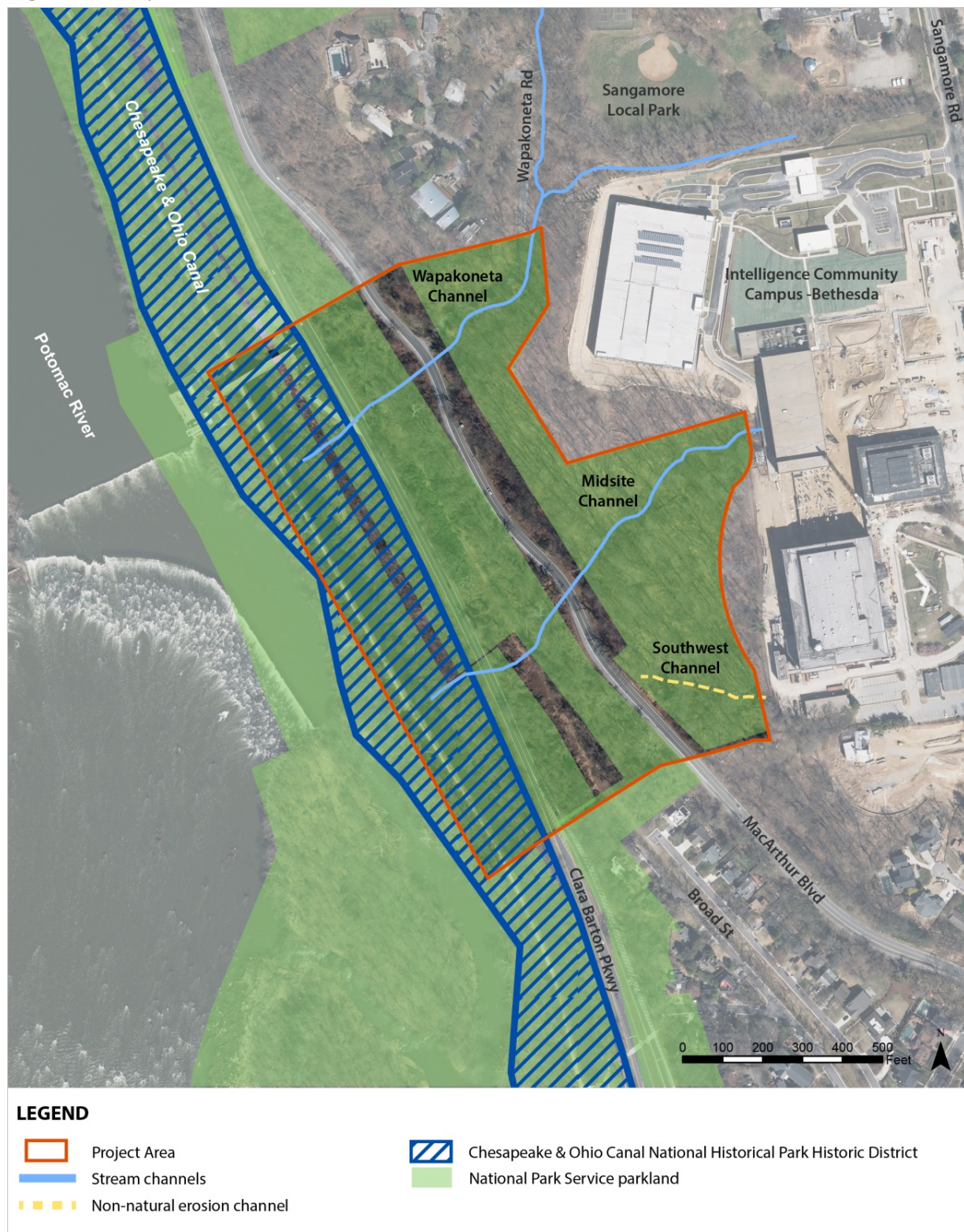
2. PROJECT DESCRIPTION

The 27.6-acre project area is located on federal land adjacent to the western side of the ICC-B site, between the ICC-B site and the Potomac River, and south of Wapakoneta Road. NPS property runs continually between the ICC-B site and the Potomac River, except for the area of MacArthur Boulevard., which is federal property administered by the U.S. Army Corps of Engineers (USACE). Two NPS units, the George Washington Memorial Parkway (GWMP) and the Chesapeake and Ohio (C&O) Canal National Historical Park administer the project area (see Figure 1).

The project site is situated downstream from the ICC-B campus, and historically received stormwater runoff from developed areas of the ICC-B site. Pages 4-11 and 4-14 of the 2011 *ICC-B Environmental Assessment* (ICC-B EA) describe the locations of stormwater outfalls at the ICC-B and their drainage into adjacent streams. As stated on page 4-11, "Drainage Areas A and B discharge to the ephemeral stream north of the site," referencing the Wapakoneta Channel. Page 4-14 states "Drainage Areas C and F discharge to the creek behind Maury Hall [Midsite Channel]." Additionally Page 4-14 notes that "Drainage Area D drains to the hillside on the southwest portion of the site...Stormwater is collected through a series of inlets and discharges directly to the hillside to convey off property." The ICC-B is in the process of implementing a master plan that calls for changes to, and/or redevelopment of, buildings, paved areas, and landscaping. As part of the master plan implementation, ICC-B received Stormwater Management and Sediment & Erosion Control Approval, effective June 17, 2016, from the Maryland Department of the Environment (MDE) to carry out improvements that would greatly reduce stormwater runoff through a decrease in impervious areas, elimination of an outfall, and the addition of bioretention facilities (MDE 2016). Many of the master plan improvements have been implemented, including a reduction of discharges conveying to the Wapakoneta, Midsite, and Southwest Channels, with completion anticipated in 2019. In order to address concerns about erosion and sedimentation contributed by the ICC-B stormwater runoff over time, ODNI and the NPS signed a Memorandum of Intent (MOI) on October 18, 2013 regarding the restoration of NPS land. The development of a restoration plan is an identified action within the MOI.

The purpose of the proposed project is to improve the long-term ecological function and drainage of two stream channels, stabilize a non-natural erosion channel, and resolve sedimentation issues on NPS land that is downstream of the ICC-B.

Figure 1: Project Area Context



The project is needed to address stormwater runoff from neighboring development that has resulted in tree root and streambank undercutting, sedimentation deposition, and channel and culvert blockages, as well as sediment load in the Chesapeake and Ohio (C&O) Canal requiring removal. Channel erosion has decreased the ecological functions and values of these channels and the C&O Canal.

The proposed action alternative includes the following elements:

- Restoration and stabilization of the Wakaponeta and Midsite Channels
- Restoration of parkland at Southwest Channel
- Removal of invasive species and planting of native vegetation

2.1 Action Alternative

Wapakoneta Channel

Multiple restoration efforts to the Wapakoneta Channel would occur under the Action Alternative (see **Figure 2** and **Figure 3**). The restoration measures include the following:

- Vegetated swale stabilization with grading, erosion control, replanting, or mulch. These changes would occur at multiple points along the Wapakoneta Channel.
- Removal of debris. The Action Alternative would remove blockages from trees limbs and trunks, as well as other debris present within the Wapakoneta Channel and Culvert 2.
- Use of sandy clay backfill to stabilize the bank. At multiple points within the site, sandy clay backfill and coir blankets, fabric, or other materials would be used to stabilize banks.
- Formation of a step pool. The Action Alternative would protect the upstream outlet from the ICC-B campus by creating a stone step pool to prevent downstream erosion.
- Use of riprap. Southeast of MacArthur Blvd. and downstream of the MacArthur Blvd. path, a small amount of riprap would be installed at the headwall to prevent additional scouring.
- Sediment removal from C&O Canal. Sediment would be removed from the C&O Canal at its intersection with the Wapakoneta Channel.

During stabilization, Wapakoneta Road would provide access to the upper Wapakoneta Channel (northeast of MacArthur Boulevard) for equipment. MacArthur Boulevard and the C&O Canal towpath would provide access to areas of the lower Wapakoneta Channel (southwest of MacArthur Boulevard).

Midsite Channel

Multiple restoration efforts to the Midsite Channel would occur under the Action Alternative (see **Figure 4** and **Figure 5**). The stabilization measures include the following:

- Vegetated swale stabilization with grading, erosion control, replanting, or mulch. These changes would occur at multiple points along the Midsite Channel.
- Removal of debris. The Action Alternative would remove blockages from trees limbs and trunks, as well as other debris present within the Midsite Channel. Southwest of MacArthur Boulevard, the Action Alternative would remove stones from the lower portion of the culvert inlet to clear the opening.
- Use of sandy clay backfill to stabilize the bank. At multiple points within the site, sandy clay backfill and coir blankets, fabric, or other materials would be used to stabilize banks.
- Use of riprap. Southwest of MacArthur Boulevard, the Action Alternative would place riprap at the culvert outlet southwest of MacArthur Boulevard and adjacent to the C&O Canal towpath in order to address scour and to prevent undercutting of the channel, respectively.
- Removal of sediment from C&O Canal. Within the C&O Canal prism, sediment would be removed from two bars near the intercept with the Midsite channel.

During stabilization, MacArthur Boulevard would provide access to the upper Midsite Channel (northwest of MacArthur Boulevard). MacArthur Boulevard and the C&O Canal towpath would provide access to areas of the lower Midsite Channel (southwest of MacArthur Boulevard).

Southwest Channel

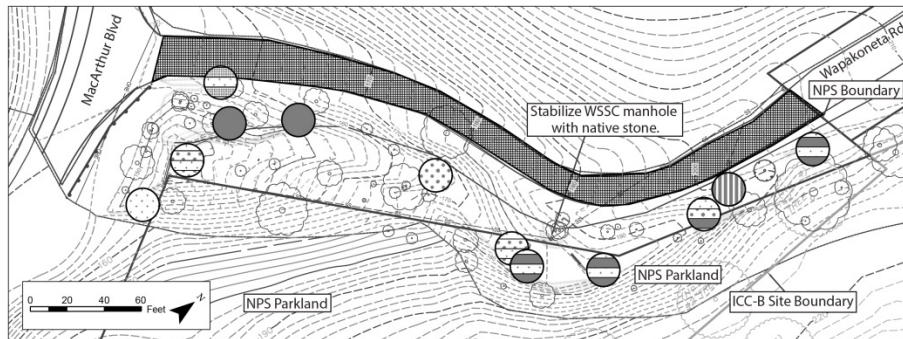
At the Southwest Channel, the existing gully eroded by stormwater in areas northeast and southwest of MacArthur Boulevard would be filled (see **Figure 6**). A series of timber wall bulkheads would be installed across the eroded gully and then filled with soil or appropriate fill materials. The channel would then be planted with native vegetation.

During the restoration of the parkland at the Southwest Channel, MacArthur Boulevard would provide access to the area.

Site-wide Restoration

Invasive vegetation would be removed in order to improve the local ecology and to prevent the colonization by new invasive vegetation at locations disturbed by the Action Alternative. The removal efforts would particularly focus on Japanese honeysuckle (*Lonicera japonica*), which is known to be present near the affected areas.

Figure 2: Wapakoneta Channel Stabilization (northeast of MacArthur Boulevard)



Legend

- Project Area
- Wapakoneta Channel detail area in above map
- Stream channels
- Non-natural erosion channel
- Remove tree debris blocking channel
- Stabilize with native vegetation plantings
- Use sandy clay backfill with native soils compacted within coir blocks to build up bank slope
- Stabilize road shoulder
- Use native stone to provide culvert outfall protection
- Potential construction route

Figure 3: Wapakoneta Channel Stabilization (southwest of MacArthur Boulevard)

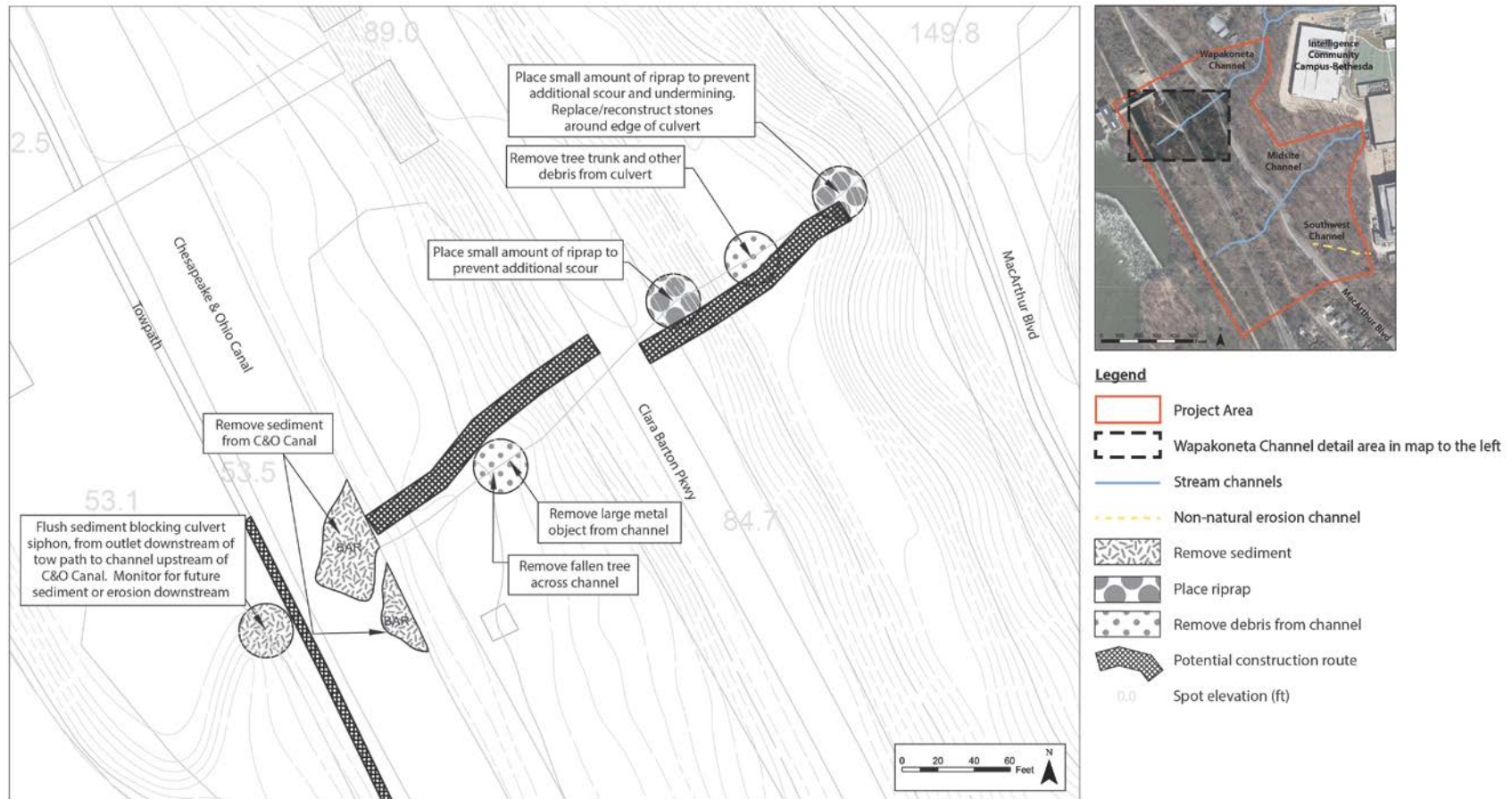


Figure 4: Midsite Channel Stabilization (northeast of MacArthur Boulevard)

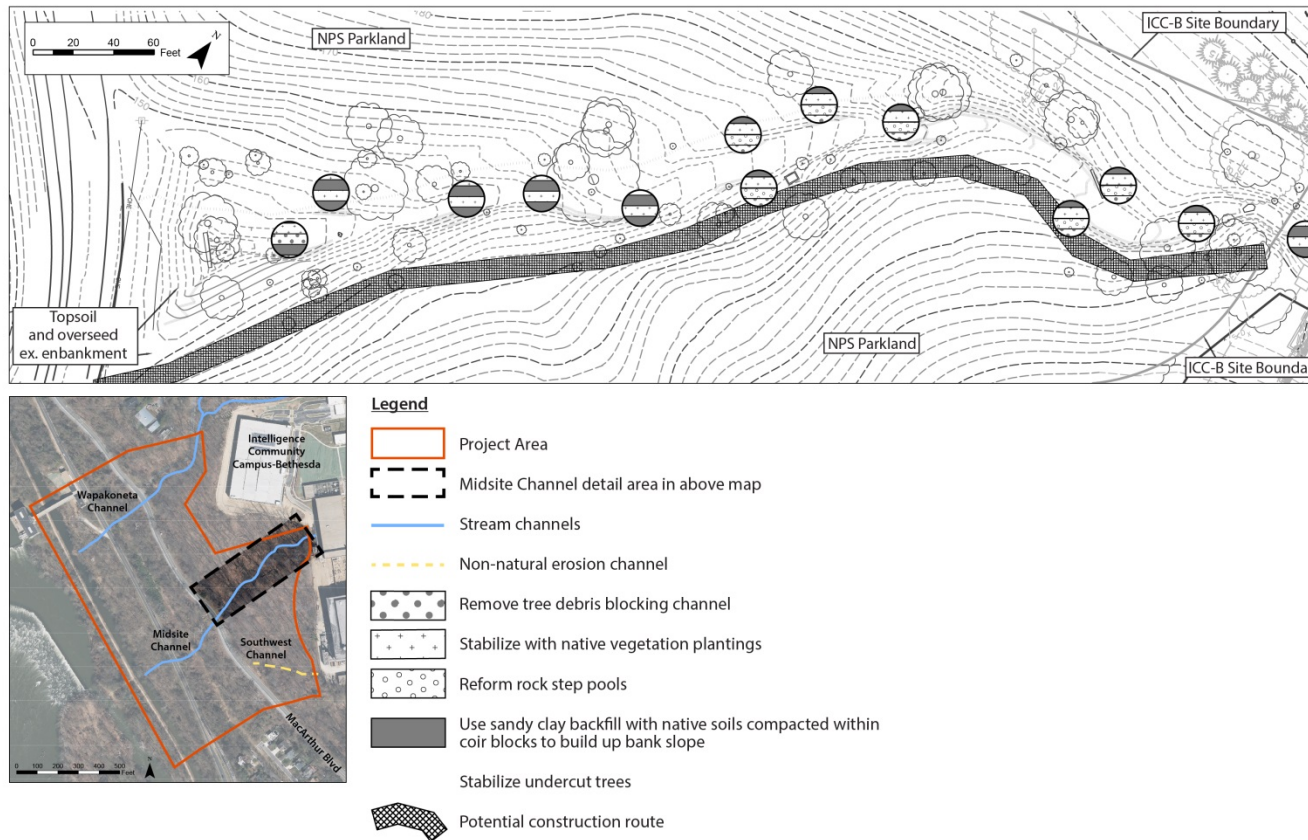


Figure 5: Midsite Channel Stabilization (southwest of MacArthur Boulevard)

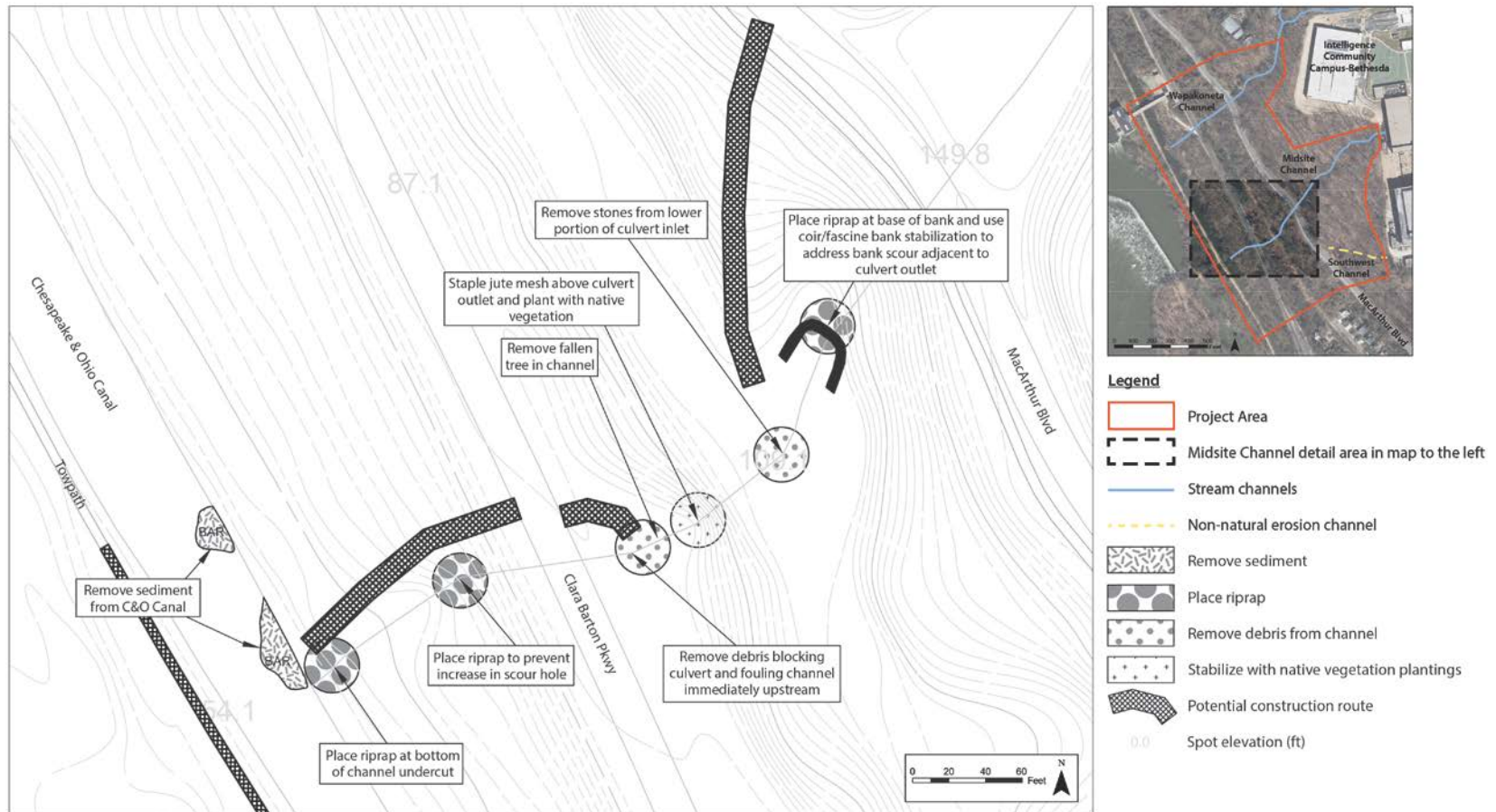
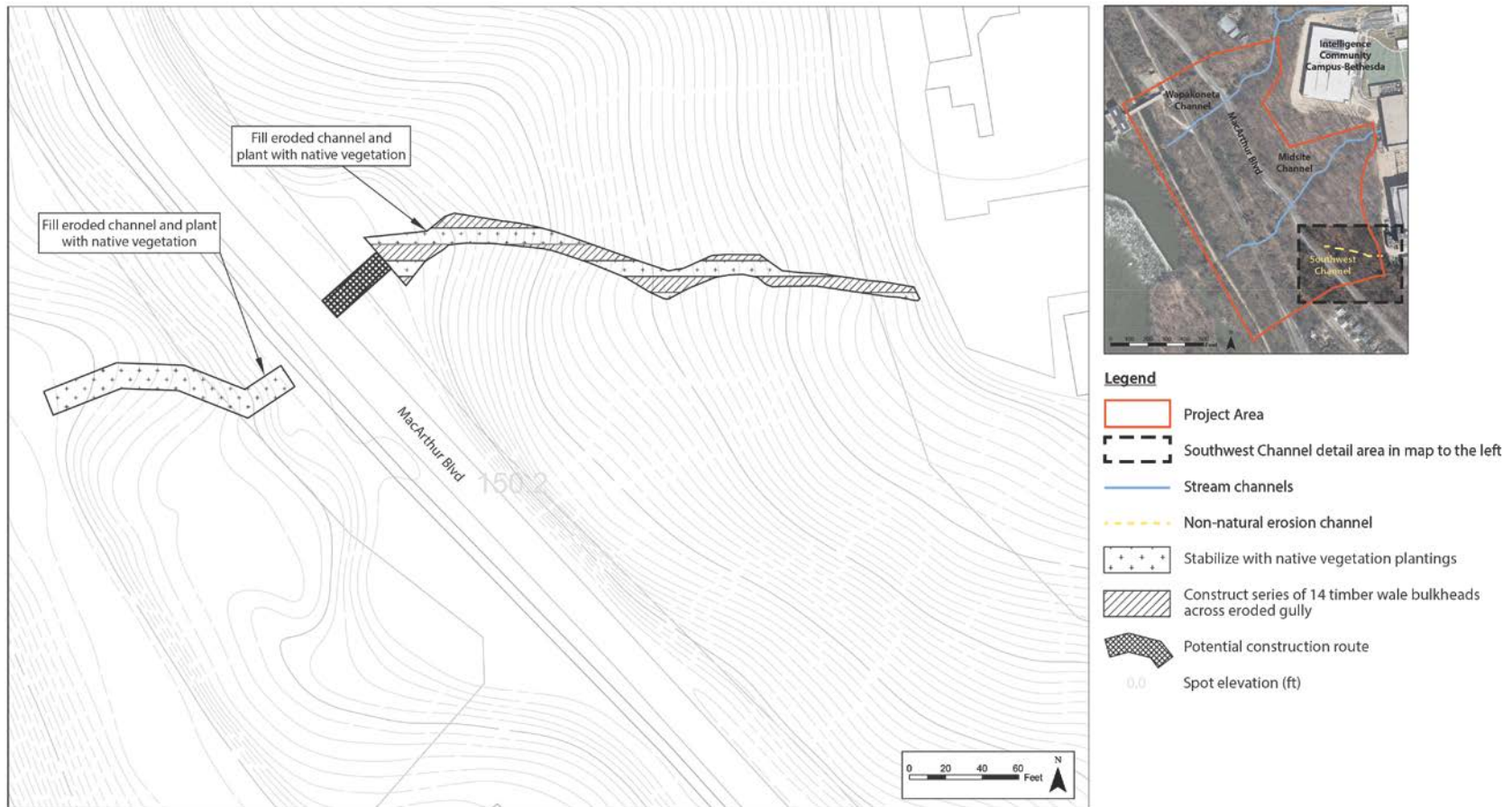


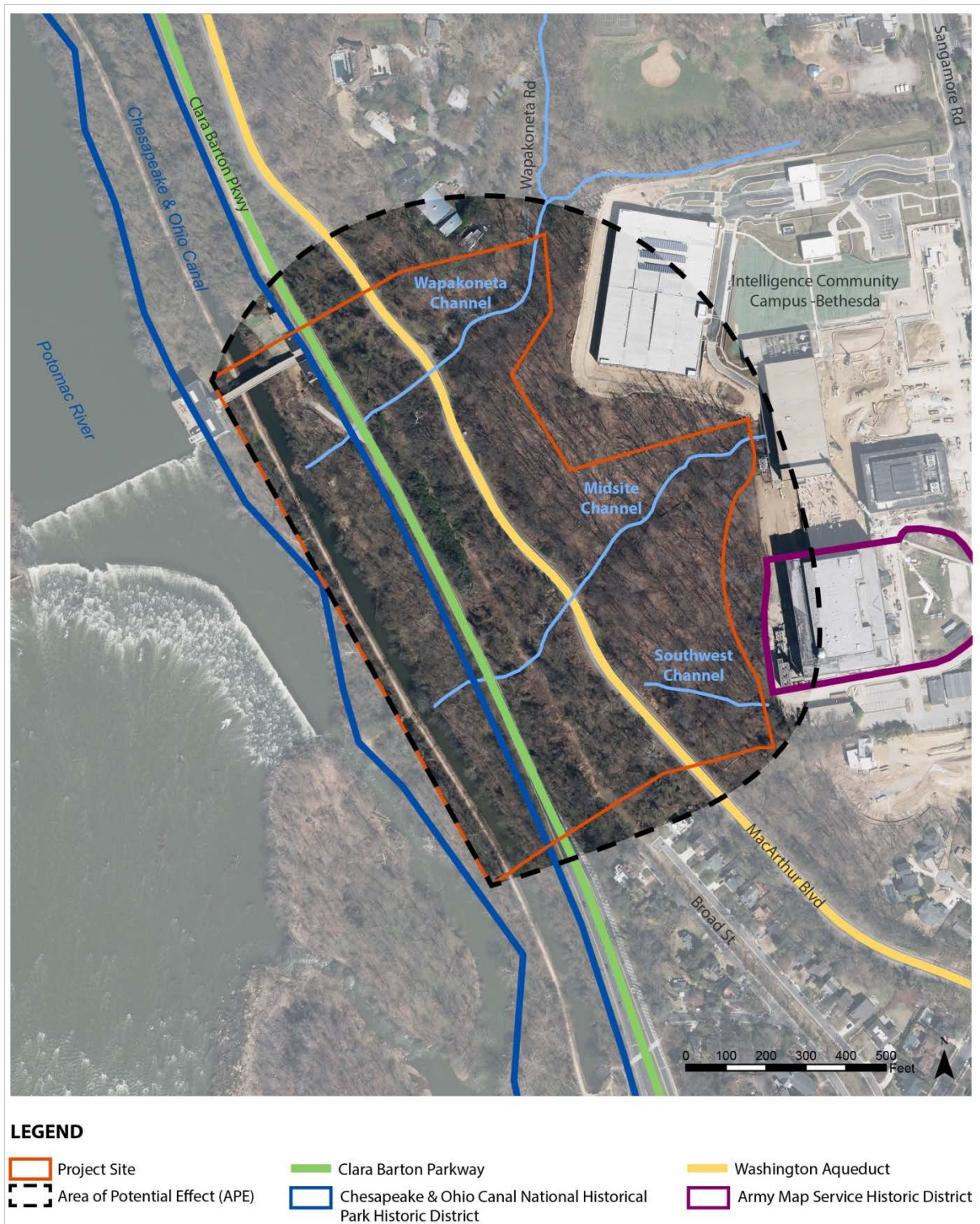
Figure 6: Southwest Channel Parkland Restoration



Area of Potential Effect

The APE for historic resources, cultural landscapes, and archeological resources is identical with that defined in the project's Environmental Assessment (EA) for these resources (**Figure 7**). The APE encompasses the project area and landscape beyond the project area's boundaries to the north, east, and south. The APE includes sections of the George Washington Memorial Parkway, the C&O Canal National Historical Park Historic District, and the Washington Aqueduct.

Figure 7: Area of Potential Effect



3. HISTORICAL SUMMARY OF THE PROJECT AREA

The landscape within the project area has changed substantially from the seventeenth century to the present, accumulating new landscape features and other resources through development and losing others through demolition. The following outline represents the primary development efforts during that time period within the APE.

- The C&O Canal, which was intended to move goods east and west from sources to markets, was constructed between 1828 and 1850.
- The Washington Aqueduct, built to supply water to Washington, DC, was constructed over several years beginning in 1853.
- MacArthur Boulevard, which was first depicted in on maps in 1865, later expanded in the 1920s and 1970s.
- The West Washington and Great Falls Electric Railway trolley line was built through the project area by 1896, along with several other structures.
- The Defense Mapping Agency opened in 1951 at what is now the ICC-B site. Concrete stairs and lighted linked the ICC-B toward the trolley line.
- Construction of the northern portion of the Clara Barton Parkway, which runs through the project area, was completed in 1965.

4. EXISTING CONDITIONS

The project area is forested land with multiple elevation changes. MacArthur Boulevard and Clara Barton Parkway traverse the project area. The project focuses on three stormwater drainage channels and the C&O Canal within the project area (see **Figure 7**).

The Wapakoneta Channel, the northernmost channel in the project area, is a natural stream channel which originates outside of the project area northeast of Wapakoneta Road. Within the project area, the channel is located along the south side of Wapakoneta Road and flows southwest where it enters a 6 ft. diameter culvert and continues to flow under MacArthur Boulevard. The channel continues to the southwest of MacArthur Boulevard for approximately 125 ft. and flows through a 7 ft. wide box culvert beneath the Clara Barton Parkway. The channel continues to flow southwest for approximately 110 feet to Culvert 2, where it flows underneath the C&O Canal and then joins with the Potomac River; during high flows, the channel also flows into the C&O Canal. The approximate length of the Wapakoneta Channel within the project area is 860 ft. Within the stream channel, tree debris accumulations and a scrap metal object blocks the channel in some areas; water flow has also eroded the streambanks.

The Midsite Channel is a natural stream channel which traverses the middle of the project area. The channel originates just outside of the project area at stormwater outfalls on the ICC-B site and flows southwest where it enters a 4 ft. diameter culvert and continues to flow under MacArthur Boulevard. The channel continues to the southwest of MacArthur Boulevard for approximately 200 ft. and flows through a 3.5 ft. wide box culvert beneath the Clara Barton Parkway. Beyond the culvert, the open channel then flow southwest for approximately 85 ft. to its confluence with the C&O Canal (AECOM 2018). The approximate length of the Midsite Channel within the project area is 1,110 ft. Debris, such as trees, a tire, and old pipes, are present within the stream channel and block the channel and culverts leading to the C&O Canal in some areas. Bank erosion and the undercutting of trees have occurred.

The Southwest Channel, the southernmost channel in the project area, is a non-natural erosion channel that flows in a northwest direction. The channel begins at an obsolete discharge point from the ICC-B site and ends southwest of MacArthur Boulevard. The approximate length of the Southwest Channel within the project area is 300 ft.

The approximate length of the C&O Canal inside the project area is 1,440 ft. A towpath runs adjacent to the west side of the canal.

4.1 Historic Resources

Historic resources in the APE include the George Washington Memorial Parkway and its component landscape, the Clara Barton Parkway; C&O Canal National Historical Park; the Washington Aqueduct; and the Army Map Service Historic District.

George Washington Memorial Parkway (including the Clara Barton Parkway)

The George Washington Memorial Parkway was listed as a historic district in the NRHP in 1995 and is a designed roadway system and cultural landscape that extends 38.3 miles along the Potomac River in Virginia, Maryland, and the District of Columbia. The George Washington Memorial Parkway is a scenic roadway dedicated to commemorating the life of George Washington and preserving the natural and historic character of the Potomac River. The Clara Barton Parkway, a component landscape of the overall George Washington Memorial Parkway, follows a 6.8 mile length of the Potomac River along the Maryland side, of which 0.31 miles are within the APE. The NHRP nomination, which was updated in 2017, used the following criteria:

- Criterion A for association with broader planning of Washington, DC and commemoration of the life of George Washington.
- Criterion B for its association with George Washington.
- Criterion C for parkway construction, engineering and transportation innovations, and landscape architecture.

The Clara Barton Parkway features close views of the locks and lock houses of the C&O Canal. The character-defining features of the Clara Barton Parkway include circulation features, road-related structures, recreation areas, vegetation, views and vistas, small-scale features, and other characteristics and uses (NPS 2017).

- ***Spatial Organization.*** The Clara Barton Parkway is characterized by a narrow two-lane roadway framed by wooded areas. MacArthur Boulevard traffic is occasionally visible, particularly during the winter months when foliage is not as dense.
- ***Land Use.*** Transportation is the primary land use identified by the Clara Barton Parkway Cultural Landscape Inventory within the APE. The roadway is used for commutes, local traffic for residents, and recreation purposes. The roadway also offers access to recreation resources.
- ***Topography.*** The topography of the Clara Barton Parkway within the APE is characterized to the north by steep terraces with bluffs above and the C&O Canal below to the south. Cantilevered roadways are also identified in the CLI; however, this condition is not present within the APE.
- ***Vegetation.*** Vegetation within much of the Clara Barton Parkway appears as a mature forest along the roadway edge. This is also the case within the APE, with very little separation between the forest and the roadway. However, the presence of non-native species somewhat diminishes the character and the integrity of the natural wooded vegetation within the APE.
- ***Circulation.*** The roadway is the primary circulation feature of the Clara Barton Parkway within the APE.

- ***Buildings and Structures.*** Although multiple types of buildings and structures are present within the cultural landscape, only one lies within the APE. A box culvert (Culvert 9) runs under the Clara Barton Parkway to the C&O Canal to pass the intermittent stream, just east of the Little Falls Pumping Station.
- ***Small-Scale Features.*** Four-inch concrete curbs line the edge of the Clara Barton Parkway roadway. The curb creates a clean distinct edge and distinguishes this parkway from other highways. The curb is present within the APE.

C&O Canal National Historical Park

The C&O Canal National Historical Park is a linear historic district and cultural landscape that extends from Georgetown in Washington, D.C. to Cumberland in western Maryland. The district encompasses approximately 20,500 acres, of which 7.8 acres are within the APE. The 184.5-mile route of the constructed waterway follows the District of Columbia/Maryland side of the Potomac River.

The historic district was listed in the NRHP in 1979, with a boundary expansion in 2015, under multiple criteria:

- Criterion A for transportation; industry and commerce; military; ethnic heritage; conservation and recreation; agriculture; community development; and recreation.
- Criterion C for engineering; and architecture.
- Criterion D for its prehistoric and historic archeological significance.

The district contains a large number of canal-related resources including a canal prism, towpath, lift locks, dams, bypass flumes, culverts, wasteweirs, and lockhouses. The canal prism and towpath run along the western portion of the project site. They are contributing elements to the historic district and are present within the APE.

Canal construction on the D.C. and Maryland river banks blocked the natural passage of inland drainages into the Potomac River; therefore, the canal company built culverts to drain watercourses of varying sizes under the canal. One such culvert is Culvert 2, located at mile 5.74 along the canal and within the APE. The culvert was built in 1830 and is a contributing resource of the historic district.

Two structures within the APE were identified as non-contributing resources of the historic district: (1) Dam #1- Little Falls is largely ruined with little structural integrity, and therefore does not qualify as a structure; and (2) The Little Falls Dam and Pumping Station, which was built in 1959, after the property's period of significance (NPS 2015b).

Washington Aqueduct

The APE includes a portion of the Washington Aqueduct, which is both a contributing resource to the C&O Canal National Historical Park and a National Historic Landmark. Initially surveyed in a 1972-73 Historic American Engineering Record, the property is significant under the themes of military and transportation. The Washington Aqueduct was built to supply water to Washington, DC. Construction of the aqueduct began in 1853. MacArthur Boulevard was built atop the aqueduct to allow service access for the utility. Within the APE, the 9-ft. diameter mortared brick and stone aqueduct runs through a tunnel. The aqueduct still supplies water to the city, pulling water from Little Falls and transporting it downstream within the APE. While most of the resource is below ground, culverts and brick vents can be found along the aqueduct; one historic culvert was previously documented within the project area (NPS 1973).

Army Map Service Historic District

The Army Map Service (AMS) Historic District was determined eligible for listing in the NRHP in 2004 and is historically significant at the national level because it is related to the history of military involvement in World War II. The district includes resources on two discontinuous parcels, the Dalecarlia Site and the Sumner Site. The APE includes a portion of the Sumner Site.

The Sumner Site consists of one contributing building, Erskine Hall, located partially within the APE, and one contributing structure, Flagpole/Globe Memorial, located outside of the APE. Erskine Hall, completed in 1946, is a five-story brick building with multi-pane windows designed by the US Engineers Office. The building functioned as the headquarters of the AMS, US Army Topographic Command, and Defense Mapping Agency Hydrographic/Topographic Command after World War II. Original plans for the building indicate an exterior stairway was constructed on the building's west façade and extended down to a trolley line east of MacArthur Boulevard. This stairway indicates that many employees used the trolley line to commute to work. Additional information about this stairway is provided in the Archeological Resources section (MHT 2004).

4.2 Archeological Resources

Prehistoric Archeological Resources

The following information is drawn from a review of historic maps, previous investigations and recorded sites, topography, existing conditions, and a brief pedestrian-level inspection.

Mid-Atlantic prehistory is traditionally divided into three major periods spanning from 10,000 B.C. to A.D. 1600, the Paleoindian, Archaic, and Woodland. Taken together, the major eras of Mid-Atlantic prehistory represent a timescale beginning with the earliest known regional occupations and concluding with the period of contact with European and African cultures.

In general, the project area has low potential to contain prehistoric archeological sites due to the presence of steep slopes, which vary from 8 to 45 percent. Narrow crests along ridge slopes are likely significantly eroded. In addition, the gently sloped portion of the project area west of MacArthur Boulevard has been subject to prior Phase I archeological survey, which did not identify significant prehistoric archeological resources.

Historic Archeological Resources

Historic maps were examined in an effort to identify historic archeological site potential. No development is shown within the APE on seventeenth or eighteenth century maps. However, archeological resources associated with three historic features – the C&O Canal, the Washington Aqueduct, and the West Washington and Great Falls Electric Railway trolley bed – may be present within the APE. In addition, maps from the late nineteenth and twentieth centuries suggest residences were present along the roads through the area.

An 1855 map of the proposed Metropolitan Railroad route shows early- and mid-nineteenth century improvements in transportation and utilities, including the C&O Canal and the Washington Aqueduct (Hutton 1855). A Civil War-era military map from 1865 is the first depiction of MacArthur Boulevard in the project area (War Department 1865). Several Civil War fortifications were present in upland areas near the project area. Although several buildings were present in the vicinity of the project area at that time, no buildings were located within the project area (Hopkins 1877, Martenet 1865).

By 1896, the West Washington and Great Falls Electric Railway trolley line was built through the project area parallel to and southwest of MacArthur Boulevard and remained in operation until the 1960s. The tracks have since been removed; however, the berm remains and some track ties remain along portions of the former trolley line (NPS 2017). The trolley line right-of-way within the APE is significantly overgrown, and no rail ties are immediately apparent.

A 1945 topographic map depicts numerous buildings or structures within the project area, primarily shown lining the south side of the trolley line (USGS 1945). Additional buildings are shown on the south side of MacArthur Boulevard and north side of a dirt road shown along the canal. These buildings are also shown on a 1951 map but had been removed by 1956. While the function and character of these resources is not known, they may represent wartime constructions. No evidence of these buildings is currently visible within the APE.

Concrete stairs with overgrown vegetation and lighting leading down from the ICC-B campus are present near the Midsize Channel. The steps led from the ICC-B, across MacArthur Boulevard, and toward the former trolley line. These features were likely built in the 1950s after the Defense Mapping Agency began operation in 1951 at what is now the ICC-B campus while the trolley was in operation. The access feature intersected with the trolley line just southeast of

the project area (USGS 1951). It is likely that a trolley station served the Defense Mapping Agency and remains of the station may be present along the trolley right-of-way.

A stone-faced outfall is located adjacent to the steps uphill from MacArthur Boulevard. The association of this feature is not readily apparent; while it may have been added at the same time as the steps (as it seems to carry the drainage under the steps), the materials suggest it may be older. A 1965 topographic map showing the newly constructed Clara Barton Parkway and the Defense Mapping Agency does not show the trolley lines and buildings along the roads (USGS 1965).

5. EFFECTS ASSESSMENT

This document records the assessment of effects on the historic and archeological resources as identified in the preceding sections. The effects of the Action Alternative are discussed in the section below, and addresses anticipated effects of the alternative on the project area's and the APE's historic and archeological resources.

5.1 Historic Resources

The Action Alternative avoids changes to the Washington Aqueduct and the AMS Historic District.

George Washington Memorial Parkway (including the Clara Barton Parkway)

Under the Action Alternative, the stabilization and replanting of the Wapakoneta and Midsite Channels with native vegetation would help re-establish the wooded vegetative character of Clara Barton Parkway by removing or stabilizing approximately eleven trees that have died or been undercut. The filling and replanting of Southwest Channel would also help re-establish the wooded vegetative character of the Clara Barton Parkway. Under the Action Alternative, the filling of the non-functional Southwest Channel would provide a more consistent topographic condition and vegetative landscape. Site-wide removal of non-native and invasive species, which have diminished the woodland character of the Clara Barton Parkway, would improve the landscape's condition. Culvert 9 would be cleared of debris to facilitate the flow of water under the Clara Barton Parkway as originally intended by the design. The construction required for the replanting and filling of the channels would disturb portions of the wooded landscape. Construction routes would avoid changes to the vegetated landscape and canopy trees to the extent practicable. The areas would then be replanted with native vegetation. The proposed project would result in no adverse effect on the George Washington Memorial Parkway.

C&O Canal National Historical Park

The Action Alternative would clear debris from Culvert 2 under the C&O Canal. The removal of debris and sediment would facilitate the flow of water from the Wapakoneta Channel under the C&O Canal prism, which would help return the culvert's original function. No changes to the culvert structure, including stonework, would occur. The Action Alternative would also remove sediment deposits from locations within the canal prism in the vicinity of its confluence with the Midsite Channel. The removal of the sediment would help restore the original drainage pattern and function of the C&O Canal. During the sediment removal and drainage improvements, work would occur adjacent to and within the canal and towpath. In order to avoid damage to the C&O Canal National Historical Park, NPS would develop strategies in consultation with the MHT regarding construction plans. The proposed project would result in no adverse effect on the C&O Canal National Historical Park.

Washington Aqueduct and Army Mapping Service Historic District

The Washington Aqueduct and the AMS Historic District lie outside the limits of disturbance for the undertaking. The Action Alternative would not alter the Washington Aqueduct or the AMS Historic District. As a result, no adverse effect on the Washington Aqueduct or the AMS Historic District would occur.

5.2 Archeological Resources

Portions of the APE contain or may contain potentially significant historic features, including features related to culverts in the drainages, the trolley line, and twentieth century buildings and structures. The Action Alternative would retain the previously recorded stone culvert associated with the Washington Aqueduct (18MO160) along the northern drainage path. The aqueduct itself is below ground under MacArthur Boulevard, and would not be affected by the drainage improvements. Sediment removal and clearing of drainage outfalls would not disturb the structure of the C&O Canal and would help return the function of the original drainage pattern.

During the sediment removal and drainage improvements, work would occur adjacent to and within the canal and towpath. In order to ensure historic features related to the C&O Canal are not damaged, NPS would develop strategies to avoid damage in consultation with the MHT. If determined appropriate, archeological monitoring would take place during construction.

Much of the stream restoration work, such as the placement of stones, riprap, and sedimentation removal, would take place within disturbed channels that have little to no archeological potential due to stormwater erosion and steep slopes, as would the filling of the Southwest Channel. However, invasive vegetation removal, vegetation restoration, grading, and clearance of pathways for construction access would disturb portions of the APE that have greater potential for archeological resources, such as near no longer extant structures depicted on 1945 mapping. These efforts would be concentrated adjacent to the existing channels.

In order to avoid and minimize potential adverse effects, a Phase IB survey would include systematic pedestrian survey, mapping, and judgmental shovel testing within areas of less than 15 percent slope and within the limits of disturbance (including proposed construction access and staging areas) rather than along the channels themselves, which are steeply sloped and previously disturbed.

The NPS would minimize ground-disturbing activities to the extent practicable during the construction phase, including using existing roadways and construction methods that minimize ground disturbance. If determined appropriate, archeological monitoring would take place during construction.

The trolley bed and concrete stairs have not been evaluated for the NRHP. However, the proposed drainage improvements would not alter these features because they are not included within the limits of disturbance of the park restoration activities. The stone outfall would remain in place under the Action Alternative, but would be cleared of debris. No changes to the structure of the outfall would occur. The proposed project would result in no adverse effect, based on the avoidance, minimization, and mitigation measures identified below.

6. AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES

In order to avoid or minimize adverse effects on historic properties, several steps would be undertaken by NPS during implementation of the Action Alternative.

- Efforts would be made to maintain the woodland character of the George Washington Memorial Parkway Historic District by planning construction routes and methods to avoid damage to large trees and to minimize native vegetation disturbance.
- Efforts would be made to avoid known historic resources to the extent practicable.
- The NPS would minimize ground-disturbing activities to the extent practicable during the construction phase, including using existing roadways and construction methods that minimize disturbance.
- Consultation with MHT would occur to develop strategies to ensure historic features of the C&O Canal National Historical Park are not damaged during construction.
- Based on the current design, the limits of disturbance, and the potential for unknown archeological resources, a Phase IB archeological survey would be conducted and include systematic pedestrian survey, mapping, and systematic and judgmental shovel testing within areas of less than 15 percent slope and within proposed construction access and staging areas rather than along the channels themselves, which are steeply sloped and previously disturbed.

7. SOURCES

AECOM

2018 Wetlands and Waters Delineation Report

Hopkins, Griffith Morgan, Jr.

1879 Atlas of fifteen miles around Washington, including the county of Montgomery, Maryland

Martenet, Simon J.

1865 Map of Montgomery County, Maryland

National Park Service (NPS)

1973 National Register of Historic Places Inventory – Nomination Form, Washington Aqueduct

NPS

2015a Clara Barton Parkway, George Washington Memorial Parkway-Clara Barton Parkway, Cultural Landscapes Inventory

NPS

2015b National Register of Historic Places Registration Form, Chesapeake and Ohio Canal National Historical Park Historic District (Additional Documentation & Boundary Increase, 2015)

NPS

2017 National Register of Historic Places Registration Form, George Washington Memorial Parkway (Additional Documentation) (Draft Update)

United States Geological Survey (USGS)

1945 Falls Church VA and Washington DC West Quadrangle Maps

USGS

1951 Falls Church VA and Washington DC West Quadrangle Maps

War Department

1865 Defenses of Washington, Extract of Military Map of N.E. Virginia Showing Forts and Roads

8. APPENDIX A



United States Department of the Interior

NATIONAL PARK SERVICE
700 George Washington Memorial Parkway
McLean, Virginia 22101

IN REPLY REFER TO:
1.A.2 (GWMP-ICC-B)

JAN 26 2018

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place, 3rd Floor
Crownsville, Maryland 21032-2023

Attn: Natalie Loukianoff and Beth Cole

Dear Ms. Hughes,

The National Park Service (NPS), in collaboration with the Office of the Director of National Intelligence (ODNI) is proposing an undertaking for the restoration of park land adjacent to the ODNI Intelligence Community Campus-Bethesda (ICC-B) in Montgomery County, Maryland. The NPS, as the lead federal agency, 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.

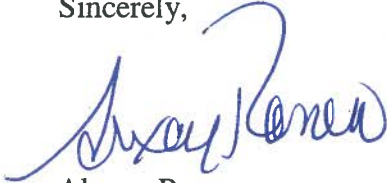
The project area is located on NPS land adjacent to the west of the ICC-B campus, between the ICC-B campus and the Potomac River. Two NPS units, the George Washington Memorial Parkway and the Chesapeake & Ohio (C&O) Canal National Historical Park administer the affected land in Bethesda, MD. The project involves restoring two eroded natural stream channels and one erosion channel that are downstream of the ICC-B and resolving sedimentation load issues at the C&O Canal. Both the George Washington Memorial Parkway and the C&O Canal National Historical Park Historic District are listed in the National Register of Historic Places and the Maryland Inventory of Historic Places.

The NPS is developing an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA). The NPS will also develop a Section 106 Assessment of Effect (AOE) for this project as a separate, but parallel, process to the EA. The proposed Area of Potential Effect is the project site and surrounding park land, as shown in the attached map. We are planning to consult with the public per 36 CFR 800.3(e) in public meetings and through our Planning, Environment, and Public Comment website (www.parkplanning.nps.gov). We anticipate these outreach efforts will accommodate the requirements of both NEPA and the Section 106 processes.

A copy of the EA and the AOE 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 Matthew Virta at 703-289-2512 or via email (matthew_virta@nps.gov).

Sincerely,



Alexcy Romero
Superintendent, George Washington Memorial Parkway

Enclosure: Proposed Area of Potential Effect





cc:

Simone Monteleone – NPS-GWMP
Matthew Virta – NPS-GWMP
Brent Steury – NPS-GWMP
Brenda Wasler – NPS-GWMP
Andrew Landsman – NPS-CHOH
Kimberly Benson – NPS-NCR

Area of Potential Effect



LEGEND

- | | |
|---|--|
|  Project Site |  Chesapeake & Ohio Canal National Historical Park Historic District |
|  Draft Area of Potential Effect (APE) |  Clara Barton Parkway |



Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Robert S. McCord, Acting Secretary

February 26, 2018

Alexcy Romero, Superintendent
George Washington Memorial Parkway
National Park Service
700 George Washington Memorial Parkway
McLean, Virginia 22101

Re: Restoration of Park Land Adjacent to the ODNI Intelligence Community Campus- Bethesda
George Washington Memorial Parkway, Montgomery County, Maryland

Dear Superintendent Romero:

Thank you for initiating consultation with the Maryland Historical Trust (Trust) regarding the proposed restoration of park land adjacent to the ODNI Intelligence Community Campus- Bethesda (ICC-B) in Montgomery County. The Trust, Maryland's State Historic Preservation Office (SHPO), is reviewing the submitted information to assess the project's effects on historic properties, pursuant to Section 106 of the National Historic Preservation Act. We offer the following comments and look forward to further consultation to successfully complete the project's historic preservation review.

In addition to the project site being located within National Park Service Land, the project site is immediately adjacent to the Army Map Service Historic District (Maryland Inventory of Historic Properties Nos. M: 35-133 and M: 35-134). We look forward to receiving the Environmental Assessment (EA) and Section 106 Assessment of Effect (AOE) for this undertaking.

The Trust looks forward to further consultation to successfully complete the project's historic preservation review. If you have questions or require further assistance, please contact Natalie Loukianoff at natalie.loukianoff@maryland.gov or Beth Cole at beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,

Natalie Loukianoff
Preservation Officer, Project Review and Compliance

EJC/NSL/201800479

CC: Andrew Landsman (NPS-CHOH)
Kimberly Benson (NPS-NCR)