



## FINDING OF NO SIGNIFICANT IMPACT

### HENKLE FARM HOUSE SITE DEMOLITION HARPERS FERRY NATIONAL HISTORICAL PARK Harpers Ferry, West Virginia

The National Park Service (NPS) prepared this environmental assessment (EA) for the Harpers Ferry National Historical Park (the Park) to evaluate the demolition of five (5) structures associated with the Henkle House Farm Site located on Schoolhouse Ridge South in Jefferson County, West Virginia. The purpose of the Harpers Ferry National Historical Park is to preserve for the benefit and enjoyment of the people as a public national memorial, commemorating historical events that occurred at or near Harpers Ferry.

This Project is needed because the structures are in a severe state of disrepair and pose a serious safety hazard to visitors and staff. The goal of the Park is to eliminate these safety hazards. It is also a Park priority to dispose of unneeded properties to make more efficient use of real estate assets. Removal of these structures will reduce maintenance costs associated with security. At the same time, demolition of the structures will help the Park restore the cultural landscape to its documented period of significance by removing post-Civil War elements. The implementation of this EA will also fulfill portions of the 2010 Harpers Ferry National Historical Park General Management Plan / Environmental Impact Statement that called for the Schoolhouse Ridge area of the Park to be managed as battlefield landscape to maintain the 1862 appearance. Demolition of the Henkle Farm House Site advances that management goal by modifying the landscape to more closely resemble the Battle of Harpers Ferry landscape.

The EA was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 as implemented by Council for Environmental Quality regulations (40 CFR 1500-1508); NPS Director's Order #12: Conservation Planning, Environmental Impact Analysis, and Decision Making; and the NPS NEPA Handbook. Compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, and Section 7 of the Endangered Species Act was conducted concurrently with the NEPA process. 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.

### PUBLIC AND AGENCY INVOLVEMENT

**Public Scoping** - Due to the small scope of this project and the lack of viable alternatives, no public scoping was held. The EA provided the public opportunity to comment on the project.

**EA Public Review** – The Park released the EA on September 5, 2023, and accepted comments through September 22, 2023. Two comments were received during the comment period; one of the commenters agreed that the buildings should be removed, while the other stated that the buildings should be restored. The results of the comments do not alter the Park's decision to demolish the structures.

**National Historic Preservation Act, Section 106 Consultation** – Pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800) "Protection of

Historic Properties,” NPS initiated consultation with the West Virginia State Historic Preservation Office (WV SHPO) in a letter dated September 17, 2018.

NPS submitted an Assessment of Effects to the SHPO which assessed whether the proposed undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify it for inclusion in the National Register of Historic Places in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Based on the Assessment of Effects, it was determined that the proposed undertaking will have an adverse effect on historic properties. A Memorandum of Agreement was entered into with the following mitigations:

1. Vegetation removal will be limited. Prior to the building demolition, the park archeologist will mark vegetation that must remain in place. There are several large trees, potentially associated with this site that are in relatively good health and should not be removed or disturbed.
2. A walkover survey of the domestic site should be conducted prior to demolition.
3. Documentation of the site should include basic Level I Historic American Buildings Survey (HABS) and Historic American Landscapes Survey (HALS) level drawings and photographs.
4. A Phase I archaeological survey and report of the property is required.

The Phase I archeological survey and documentation were conducted in December 2022. The survey results were typical of a late 19th-/early-20th century rural domestic site. Based upon the survey, it was determined that the demolition of the structures will not cause an adverse effect to the archeological resources. The NPS, following the stipulations of the Memorandum of Agreement (Appendix A) with the WV SHPO, will implement measures to limit ground disturbance and will employ protective measures, such as the use of mats to safeguard cultural resources.

**Tribal Consultation** – NPS sent consultation initiation letters as well as a notice of availability for the EA to the following tribes in August 2022: Absentee Shawnee, Catawba, Delaware Nation, Pamunkey, Shawnee, Chickahominy, Chickahominy Eastern, Monacan, Nansemond, Rappahannock, and Upper Mattaponi. Responding tribes agreed with the no adverse effect determination and requested that they be notified if inadvertent finds were discovered.

**Endangered Species Act, Section 7 Consultation** - An official species list was obtained using the United States Fish & Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) System on July 26, 2023, that identified the federally listed threatened northern long-eared bat and the federally endangered Indiana bat as potentially occurring in the vicinity of the project site. The NPS determined that implementation of the proposed Plan may affect, not likely to adversely affect the listed species. Therefore, no further consultation with USFWS is necessary. The official species list obtained through the IPaC System and USFWS Concurrence Letters are included in Appendix A.



## **ALTERNATIVES CONSIDERED AND SELECTED**

The alternatives considered for this project include the no action alternative (which are the current conditions) and action alternative (demolition of structures and stabilize foundation footprint) the NPS Preferred Alternative. Based on the analysis presented in the EA, the NPS has selected the action alternative for implementation. Under this alternative, the Park will demolish five structures, but leave much of the foundations of the historic buildings in place, as well as the ornamental trees, shrubs and flowers that are part of the cultural landscape. The debris from the structures would be hauled to the local landfill. The pit in the silo will be filled with dirt/gravel to prevent any future wildlife entrapment. The site will be used for interpretive purposes and re-opened to visitor use. Interpretive waysides will be installed to tell the story of the Allstadt family.

## **RATIONALE FOR DECISION**

Under the Preferred Alternative, the removal of the five structures will result in the elimination of safety hazards for the employee and visitor. Maintenance costs for security will be eliminated from the budget. The cultural landscape will be restored to the desired period of 1862. Removing the structures aids in the NPS's initiative to "Freeze the Footprint." Overall impacts to visitor use and experience would be short-term due to the limited closure of the trail that accesses the property. This action will result in an adverse effect to properties contributing to the National Register. However, all structures would be documented prior to project start, an archeological survey will be conducted along with a cultural landscape survey. Site restoration would occur following demolition. The NPS will incorporate the history of the site into future cultural resource studies and public interpretation of Schoolhouse Ridge.

## **MITIGATION MEASURES**

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse impacts to affected resources, whether under the jurisdiction of the NPS or as a result of an NPS decision. To help ensure the protection of cultural and natural resources and the quality of the visitor experience, the NPS will require mitigation measures to avoid and/or minimize impacts. Mitigation measures of the selected alternative are provided in the Section 106 Memorandum of Agreement the NPS entered into with the West Virginia SHPO (see Appendix A). These mitigation measures will allow the NPS to meet its conservation mandates as required by the NPS Organic Act (54 USC 100101 et seq.) and minimize impacts to the park visitors.

## **WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT IMPACT**

After considering the environmental consequences described in the EA, the NPS has determined that the selected alternative and its associated actions will not have a significant effect on the quality of the human environment considering the potentially affected environment and degree of effects of the action (40 CFR 1501.3(b)(7)). Thus, an Environmental Impact Statement will not be prepared. This finding is based on analysis of the short- and long-term effects; beneficial and adverse effects; effects to public health or safety; and effects that will violate Federal, State, or local laws or requirements for the protection of the environment.

**Visitor Use and Experience** - The impacts of Alternative 2 would open the area up to visitation and interpretation and eliminate the safety concerns associated with collapsing structures. This alternative would also improve the visual aesthetics by returning the landscape to what it once was during the battle and reduce the costs associated with safety and security. Demolition of this historic site, which is listed as contributing to the National Register, will result in an adverse effect to historic properties. Beneficial cumulative impacts would occur to the overall visitor use and experience as the site is made safe for visitors and interpretive opportunities are increased and diversified within the Park as a whole.

**Historic Structures, Districts, Cultural Landscape and Archeology** - The NPS intends to remove the structural portion of the buildings that pose a risk of fall damage or injury and leave as much of the foundation of the historic buildings as possible. The surrounding landscape, including ornamental trees, shrubs, and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not disturb or damage any of the foundations or potential archeological remains. Demolition of this historic site, which is listed as contributing to the National Register, would result in an adverse effect to historic properties.

## 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:**

**TANYA GOSSETT**

Digitally signed by TANYA  
GOSSETT  
Date: 2023.11.03 12:24:15 -04'00'

November 3, 2023

Tanya M. Gossett  
Acting Superintendent  
Harpers Ferry National Historical Park  
National Capital Region

Date

**Approved:**

**KIMBERLY HALL**

Digitally signed by KIMBERLY  
HALL  
Date: 2023.11.14 16:40:43  
-05'00'

Kym A. Hall  
Regional Director  
National Capital Region

Date

**Appendix A:** Agency Consultation Documentation

**Appendix B:** Non-Impairment Determination

## **APPENDIX A: AGENCY CONSULTATION DOCUMENTATION**



IN REPLY REFER TO:

# United States Department of the Interior

NATIONAL PARK SERVICE  
Harpers Ferry National Historical Park  
P.O. Box 65  
Harpers Ferry, West Virginia 25425

1.A.1 (HAFE-H4218)

September 17, 2018

Ms. Susan Pierce  
Deputy State Historic Preservation Officer  
West Virginia Division of Culture and History  
Historic Preservation Office  
1900 Kanawha Boulevard East  
Charleston, WV 25305-0300

Subject: Demolish Structures on the Henkle Property (PEPC 76643), Harpers Ferry National Historical Park, Jefferson County

Dear Ms. Pierce:

The National Park Service (NPS), Harpers Ferry National Historical Park (HAFE) wishes to initiate consultation with the West Virginia Historic Preservation Office under Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) regarding the demolition of five historic structures, in accordance with 36 CFR 800.3 of the regulations of the Advisory Council on Historic Preservation. This letter serves to inform the West Virginia Historic Preservation Office of HAFE's determination that the proposed undertaking will result in An Adverse Effect to historic properties.

## Management Summary and Description of Undertaking

HAFE proposes to demolish five structures associated with the Jacob "Furl" and Susan Allstadt Henkle Farmstead located in a wooded area on the School House Ridge South Battlefield. The five structures include a house, barn, silo, milk house and corncrib. The primary structure is a two-story balloon frame dwelling sheathed in German lap siding. It dates to the early twentieth century and is a typical two-story three-bay frame I-house with a side facing gable roof clad in standing seam metal. A projecting ell is attached to the rear of the house. The other four structures are within close vicinity of the house and are associated with the farmstead. Although it is collapsed, the ruins of the three-story barn still remain in place. The foundation consists of poured concrete, but the framing is made of heavy timbers with mortise-and-tendon joinery. A concrete block silo is attached to the barn and remains intact except for its roof. The milk house is also constructed of concrete blocks with a poured concrete floor. Lastly, the corn crib is constructed of milled lumber and is currently in ruins.

Currently, all five of the structures are in a severe state of disrepair and are considered a health and safety hazard. This demolition project intends to address the health and safety



concerns by removing the structural portions of the buildings that pose a risk of fall damage or injury. Essentially, the superstructures will be removed, but as much as possible, the foundations of the historic buildings will remain in place. Furthermore, the surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.

Oral history suggests that the Henkle house was built sometime after 1906 by Jacob "Furl" Henkle. The property was operated as a farm and was part of a larger allotment owned by the Allstadt family including Jacob's mother, Susan Allstadt Henkle. After Susan's death in 1920, the property was sold to the Standard Lime & Stone Company. Thereafter, the farm was leased and used as the Standard Company Farm. Based upon construction techniques and design, the dairy barn, milk house, silo and corn crib probably date to after 1920 when the property was owned by the Standard Lime and Stone Company. From the 1920's until its abandonment in the 1950's, the structures were updated and renovated as technology in the dairy industry changed.

### **Area of Potential Effect**

The area of potential effect (APE) for this project, as proposed, encompasses the entire wooded area of the Henkle farmstead. All of the structures comprising the farmstead are proposed for removal, leaving only foundations and the cultural landscape intact. Because the structures are in a wooded area, the surrounding viewshed of the Schoolhouse Ridge Battlefield will not be affected.

### **Identification of Historic Properties**

The APE has been surveyed for cultural resources for the Harpers Ferry National Historical Park Historic District. Surveys were conducted as part of the National Register of Historic Places listing (boundary increase 2016) and a cultural landscape inventory. The house and the site are listed as contributing on the National Register. Other contributing elements to the Historic District within or adjacent to the APE include the Schoolhouse Ridge Battlefield and the John Hall Allstadt House Ruins.

### **Consultation and Potential Effects to Historic Properties**

Based on known information about Native American Groups in the study area, we have determined that there are no federally recognized tribes listed that might attach cultural or religious significance to the APE. Therefore, no consultation with Native American Groups is necessary. Additionally, it is not believed that this action will affect ethnographic resources or museum collections.

Our analysis of the APE, research of the existing documentation, consultation with regional experts, and evaluation of the project scope leads us to conclude that the proposed

stabilization project will have An Adverse Effect on historic properties under 36 CFR 800.5. Since the site and the house are contributing structures mitigations are necessary to lessen the adverse effect. The following are mitigations that the park has placed on this demolition.

- Vegetation removal will be limited. Prior to the building demolition, the park archaeologist will mark vegetation that must remain in place. There are a number of large trees potentially associated with this domestic site that are in good health and should not be removed. A walkover survey may identify other flowers and bushes associated with the site. A pre-construction meeting with the contractor will review access within the site and identify areas to avoid.
- A walkover survey of the domestic site should be conducted prior to demolition and a detailed Cultural Landscape inventory created.
- Documentation of the site should include documentation including but not limited to HABS level drawings and photographs. Additional documentation such as a historic structures report, would benefit the understanding of these structures in context to their location.

Through the consultation process with the SHPO the park wishes to identify any further potential mitigations that should be applied to this project in accordance with 36 CFR 800.6.

This letter is accompanied by relevant supporting documentation that identifies the location of the APE and additional details of the project. A list of references is also provided. Any of the referenced reports can be provided, upon request, in PDF format. If you have any questions, please feel free to contact Darlene Hassler, Cultural Resources Management Specialist, at 304-535-6188 or [darlene\\_hassler@NPS.gov](mailto:darlene_hassler@NPS.gov).

Sincerely,



H. Tyrone Brandyburg  
Superintendent  
Harpers Ferry National Historical Park

#### **Attachments**

Assessment of Effect Form  
Supporting Documentation and Photographs

#### **References**

National Park Service

2005 *Allstadt Farm Cultural Landscapes Inventory*, United States Department of the Interior, National Park Service, National Capitol Region, Washington, D.C.

National Register of Historic Places



2016      Harpers Ferry National Historical Park (Boundary Increase), Harpers Ferry,  
Jefferson/Loudoun Counties, West Virginia/Virginia, National Register #16000238.



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

**Randall Reid-Smith, Commissioner**

Phone 304.558.0220 • [www.wvculture.org](http://www.wvculture.org)  
Fax 304.558.2779 • TDD 304.558.3562

EEO/AA Employer

Mr. H. Tyrone Brandyburg, Superintendent  
Harpers Ferry National Historical Park  
Post Office Box 65  
Harpers Ferry, West Virginia 25425

RE: Demolition of Structures on the Henkle Property (PEPC 76643)  
Harpers Ferry National Historical Park  
FR# 18-1443-JF

Dear Superintendent Brandyburg:

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

According to submitted information, Harpers Ferry National Historical Park (HAFE) proposes to demolish five structures associated with the Henkle Farmstead on the School House Ridge South Battlefield. The house and farm structures will be removed to the foundations and aspects of the landscaping, including older trees, will be retained. The project will remove 20<sup>th</sup>-century structures that have become hazardous. These houses are an intrusion on the legislated 1862 period. The removal will aid in the National Park Service "Freeze the Footprint" initiative. The house and site are listed as contributing resources to the National Register of Historic Places nomination for Harpers Ferry National Historical Park Historic District.

Architectural Resources:

As submitted, we concur the proposed project would result in an Adverse Effect and require the completion of a Memorandum of Agreement (MOA). Specifically, federal regulations in 36 CFR 800.6(a) state that, with regards to resolution of adverse effect, "[T]he agency official shall consult with the SHPO/THPO and other consulting parties...to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize or mitigate adverse effects on historic properties." It is our understanding that an internal review of the project concluded the adverse effect and identified mitigation options. The Harpers Ferry National Historical Park has identified the need to move forward with a MOA. Please forward a draft MOA proposal to our office and invite the Advisory Council on Historic Preservation to comment on the project. We will provide further comment upon receipt of the requested information.

Archaeological Resources:

In 2005, a Cultural Landscape Inventory was prepared for the Allstadt Farm property, which includes the Henkle farm. It was determined that the Henkle house and farm structures are contributing to the cultural landscape of the property. It was recommended that archaeology could provide useful information on the 1862 Battle of Harpers Ferry and to gain a better understanding of social and agricultural history in the Harpers Ferry area. Our office concurred with the findings of the Allstadt Farm Cultural Landscape Inventory. According to the submitted information, the Henkle farm and all associated structures are



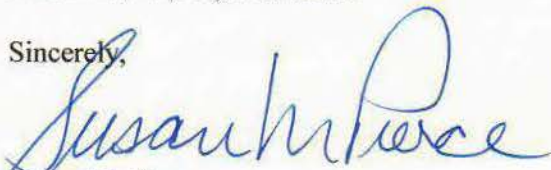
listed as a contributing site to the 2015 National Register update for Harpers Ferry National Historical Park, which emphasizes the significance of both the Civil War history and the Twentieth Century industrial history of School House Ridge. It is the opinion of HAFE that the proposed demolition project will have an *adverse effect* on the contributing site. A MOA is being drafted for the project and as a mitigation measure, HAFE recommends that a walkover survey of the domestic site be conducted prior to demolition. We concur that a survey should be conducted in the project area prior to demolition. However, we recommend that the survey include shovel probe excavations as we understand that no excavation was conducted for either the CLI or the 2015 boundary increase. We will provide further comments upon receipt of the resulting technical report. If archaeological resources are identified during the survey, assessment of the current project's effects to these resources and National Register eligibility must be addressed in the technical report. Please be aware that supplemental mitigation measures, including additional archaeological investigations, may be necessary to address any adverse effects if avoidance is not feasible.

Public Comments:

In addition, federal regulations in 36 CFR 800.2(d)(1), 800.2(d)(2), 800.3(e), 800.6(a)(4) all stress the importance of public comment during the Section 106 process. If you have already completed this aspect of the requirements under Section 106, please provide written documentation of that along with any comments you have received. Please forward any comments that you receive to this office. If you receive no comments, please indicate that *in writing* to this office.

We appreciate the opportunity to be of service. *If you have questions regarding our comments or the Section 106 process, please contact Carolyn M. Kender, Archaeologist, or Ernest Blevins, Structural Historian, at (304) 558-0240.*

Sincerely,



Susan M. Pierce  
Deputy State Historic Preservation Officer

SMP/EEB/CMK



**MEMORANDUM OF AGREEMENT  
BETWEEN HARPERS FERRY NATIONAL HISTORICAL PARK  
AND THE  
WEST VIRGINIA STATE HISTORIC PRESERVATION  
OFFICE  
REGARDING PEPC 76643, FR-18-1443-JF, DEMOLISH FIVE STRUCTURES AT THE  
HENKLE HOUSE PROPERTY ON SCHOOL HOUSE RIDGE SOUTH BATTLEFIELD**

**WHEREAS**, Harpers Ferry National Historical Park, (HAFE) plans to demolish five structures associated with the Jacob “Furl” and Susan Allstadt Henkle Farmstead located in a wooded area on the School House Ridge South Battlefield (undertaking) pursuant to 54 U.S.C. § 306108); and

**WHEREAS**, the undertaking consists of the demolition of a house, barn, silo, milk house and corncrib. The primary structure is a two-story balloon frame dwelling sheathed in German lap siding. It dates to the early twentieth century and is a typical two-story three-bay frame I-house with a side facing gable roof clad in standing seam metal. A projecting ell is attached to the rear of the house. The other four structures are within close vicinity of the house and are associated with the farmstead. Although it is collapsed, the ruins of the three-story barn still remain in place. The foundation consists of poured concrete, but the framing is made of heavy timbers with mortise-and-tendon joinery. A concrete block silo is attached to the barn and remains intact except for its roof. The milk house is also constructed of concrete blocks with a poured concrete floor. Lastly, the corn crib is constructed of milled lumber and is currently in ruins. Currently, all five of the structures are in a severe state of disrepair and are considered a health and safety hazard. This demolition project intends to address the health and safety concerns by removing the structural portions of the buildings that pose a risk of fall damage or injury. Essentially, the superstructures will be removed, but as much as possible, the foundations of the historic buildings will remain in place. Furthermore, the surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains; and

**WHEREAS**, HAFE has defined the undertaking’s area of potential effects (APE) as the area encompassing the entire wooded area of the Henkle farmstead. All of the structures comprising the farmstead are proposed for removal, leaving only foundations and the cultural landscape intact. Because the structures are in a wooded area, the surrounding viewshed of the Schoolhouse Ridge Battlefield will not be affected; and

**WHEREAS**, HAFE has determined that the undertaking will have an adverse effect on properties listed as contributing on the National Register, and has consulted with the West Virginia State Historic Preservation Officer (SHPO) pursuant to 36 CFR Part 800, the regulations implementing Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108); and

**WHEREAS**, in accordance with 36 CFR § 800.6(a)(1), HAFE has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation, and the ACHP has chosen *not to* participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

**NOW, THEREFORE,** HAFE and the WV SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

## **STIPULATIONS**

HAFE shall ensure that the following measures are carried out:

- I. As much as possible, the foundations of the historic buildings will remain in place. The park archeologist will monitor the demolition and work with the contractors to ensure the least amount of damage to the landscape. The scope of work for the demolition will specify criteria that excavation is not allowed and that the foundations must be protected. As much as possible, the foundations will be filled in with clean fill to stabilize and secure the site. If, in the process of demolition, a portion of the foundation collapses, the park archeologist will work with the contractor to ensure that the foundation remnants remain in place and no further collapses occur.
- II. The surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.
- III. In order to fulfill federal documentation requirements and, due to the fact that very little documentation exists for this site, a basic level of HABS and HALS documentation will be conducted prior to the demolition.
- IV. A phase I archeological survey will be conducted prior to the demolition. The results and recommendations of the survey will be shared with the WV SHPO. If findings rise to the level of a phase II investigation, further consultation with the WV SHPO will be required.
- V. An environmental Assessment (EA) will be conducted prior to the demolition. This process will include a public scoping period to allow for public scoping and comment.

## **VI. DURATION**

This MOA will expire if its terms are not carried out within five (5) years from the date of its execution. Prior to such time, HAFE may consult with the other signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation VII below.

## **VII. MONITORING AND REPORTING**

At this time, HAFE has not acquired the funding to execute this project. Once funding has been acquired, HAFE shall provide all parties to this MOA with an intent to proceed. HAFE will provide all parties with copies of the archeology, HABS and HALS reports, prior to any demolition for review and further consultation. Within 60 days following the execution of the demolition, HAFE shall provide all parties to this MOA a summary report detailing work undertaken pursuant to the terms of the MOA. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in HAFE's efforts to carry out the terms of this MOA.

## **VIII. POST REVIEW DISCOVERIES**

If properties are discovered that may be historically significant or unanticipated effects on historic properties found, HAFE shall stop work and consult with the SHPO to determine further action.

## **IX. DISPUTE RESOLUTION**

Should any signatory or concurring party to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, HAFE shall consult with such party to resolve the objection. If HAFE determines that such objection cannot be resolved, HAFE will:

A. Forward all documentation relevant to the dispute, including HAFE's proposed resolution, to the ACHP. The ACHP shall provide HAFE with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, HAFE shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. HAFE will then proceed according to its final decision.

B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day period, HAFE may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, HAFE shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the MOA, and provide them and the ACHP with a copy of such written response.

C. HAFE's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

## **X. AMENDMENTS**

This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

## **XI. TERMINATION**

If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other signatories to attempt to develop an amendment per Stipulation VII, above. If within thirty (30) days an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.

Once the MOA is terminated, and prior to work continuing on the undertaking, HAFE must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. HAFE shall notify the signatories as to the course of action it will pursue.

Execution of this MOA by HAFE and the WV SHPO and implementation of its terms evidence that HAFE has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

## Harpers Ferry National Historical Park

Tyrone Brandyburg, Superintendent

Deputy State Historic Preservation Officer



IN REPLY REFER TO:

# United States Department of the Interior

NATIONAL PARK SERVICE  
Harpers Ferry National Historical Park  
P.O. Box 65  
Harpers Ferry, West Virginia 25425

1.A.1 (HAFE-H4218)

July 27, 2022

John Johnson  
Governor  
Absentee Shawnee Tribe of Indians of Oklahoma  
2025 South Gordon Cooper Drive  
Shawnee, OK 74801

Subject: Introduction and Section 106 Consultation and Environmental Assessment for Demolition of Historic Structures on the Henkle Property (PEPC 76643), Harpers Ferry National Historical Park, Jefferson County, WV

Governor Johnson:

On behalf of the Harpers Ferry National Historical Park (HAFE), I would like to introduce myself to you and to begin the process of establishing a relationship with the Absentee Shawnee Tribe of Indians of Oklahoma. As the Park superintendent, I manage approximately 3,750 acres of public land located in West Virginia, Maryland and Virginia. The Park is situated at the confluence of the Shenandoah and Potomac Rivers and contains a diverse array of cultural and natural resources. Although the Park is often associated with John Brown's Raid and the Civil War, it also tells stories associated with African American, industrial and transportation history. People have long been drawn to this unique geographical location and the abundance of natural resources.

I am committed to building a government-to-government relationship and consulting with you on Park projects. I also look forward to collaborating with you to better understand the values and significance that indigenous people attribute to the places that are now a part of the Harpers Ferry National Historical Park. Along with my staff, I am interested in working with you to establish meaningful connections to these places through your stories and your voice. I look forward to the opportunity to consult and collaborate with you on present and future projects and building our relationship. In the near future, I will be reaching out to you to provide a more comprehensive review of Harpers Ferry National Historical Park and to discuss some of the specific areas in which we would like to get your input. To begin our consulting relationship, I have included the Section 106 consultation and Environmental Assessment for an upcoming project involving the demolition of historic structures on Park land.



## **Section 106 Consultation Initiation**

The National Park Service (NPS), Harpers Ferry National Historical Park (HAFE) wishes to initiate consultation with the Absentee Shawnee Tribe of Indians of Oklahoma under Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) regarding the demolition of five historic structures, in accordance with 36 CFR 800.3 of the regulations of the Advisory Council on Historic Preservation (ACHP). This letter serves to inform the Absentee Shawnee Tribe of Indians of Oklahoma of HAFE's determination that the proposed undertaking will result in An Adverse Effect to historic properties. The NPS has consulted with the West Virginia State Historic Preservation Office (SHPO) which concurred with the NPS determination and entered into a Memorandum of Agreement to mitigate the effects.

## **Management Summary and Description of Undertaking**

HAFE proposes to demolish five structures associated with the Jacob "Furl" and Susan Allstadt Henkle Farmstead located in a wooded area on the School House Ridge South Battlefield. The five structures include a house, barn, silo, milk house and corncrib. The primary structure is a two-story balloon frame dwelling sheathed in German lap siding. It dates to the early twentieth century and is a typical two-story three-bay frame I-house with a side facing gable roof clad in standing seam metal. A projecting ell is attached to the rear of the house. The other four structures are within close vicinity of the house and are associated with the farmstead. Although it is collapsed, the ruins of the three-story barn still remain in place. The foundation consists of poured concrete, but the framing is made of heavy timbers with mortise-and-tendon joinery. A concrete block silo is attached to the barn and remains intact except for its roof. The milk house is also constructed of concrete blocks with a poured concrete floor. Lastly, the corn crib is constructed of milled lumber and is currently in ruins.

Currently, all five of the structures are in a severe state of disrepair and are considered a health and safety hazard. This demolition project intends to address the health and safety concerns by removing the structural portions of the buildings that pose a risk of fall damage or injury. Essentially, the superstructures will be removed, but as much as possible, the foundations of the historic buildings will remain in place. Furthermore, the surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.

Oral history suggests that the Henkle house was built sometime after 1906 by Jacob "Furl" Henkle. The property was operated as a farm and was part of a larger allotment owned by the Allstadt family including Jacob's mother, Susan Allstadt Henkle. After Susan's death in 1920, the property was sold to the Standard Lime & Stone Company. Thereafter, the farm was leased and used as the Standard Company Farm. Based upon construction techniques and design, the dairy barn, milk house, silo and corn crib probably date to after 1920 when the property was owned by the Standard Lime and Stone Company. From the 1920's until its

abandonment in the 1950's, the structures were updated and renovated as technology in the dairy industry changed.

### **Area of Potential Effect**

The area of potential effect (APE) for this project, encompasses the entire wooded area of the Henkle farmstead. All of the structures comprising the farmstead are proposed for removal, leaving only foundations and the cultural landscape intact. Because the structures are in a wooded area, the surrounding viewshed of the Schoolhouse Ridge Battlefield will not be affected.

### **Identification of Historic Properties**

The APE has been surveyed for cultural resources for the Harpers Ferry National Historical Park Historic District. Surveys were conducted as part of the National Register of Historic Places listing (boundary increase 2016) and a cultural landscape inventory. The house and the site are listed as contributing on the National Register. Other contributing elements to the Historic District within or adjacent to the APE include the Schoolhouse Ridge Battlefield and the John Hall Allstadt House Ruins.

### **Consultation and Potential Effects to Historic Properties**

Our analysis of the APE, research of the existing documentation, consultation with regional experts, and evaluation of the project scope leads us to conclude that the proposed project will have An Adverse Effect on historic properties under 36 CFR 800.5. Since the site and the house are contributing structures, mitigations are necessary to lessen the adverse effect. The following are mitigations that the park has placed on this demolition.

- The surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.
- Documentation of the site should include drawings and photographs.
- A Phase I archeological survey will be conducted prior to demolition.
- As much as possible, the foundations of the historic buildings will remain in place. The Park archeologist will monitor the demolition and work with the contractors to ensure the least amount of damage to the landscape. The scope of work for the demolition will specify criteria that excavation is not allowed and that the foundations must be protected. As much as possible, the foundations will be filled in with clean fill to stabilize and secure the site. If, in the process of demolition, a portion of the foundation collapses, the park archeologist will work with the contractor to ensure that the foundation remnants remain in place and no further collapses occur.

In accordance with the National Environmental Policy Act (NEPA), the NPS has prepared an environmental assessment (EA) that will address this project. The NPS intends to coordinate consultation and NEPA review per Advisory Council on Historic Preservation regulations 36CFR 800.8 and to consult with the public through our Planning, Environment, and Public Comment (PEPC) website.

This letter is accompanied by relevant supporting documentation that identifies the location of the project and additional details of the project. A list of references is also provided. Any of the referenced reports can be provided, upon request, in PDF format. If you have any questions, please feel free to contact Darlene Hassler, Cultural Resources Management Specialist, at 304-535-6188 or [darlene\\_hassler@NPS.gov](mailto:darlene_hassler@NPS.gov).

Sincerely,

A handwritten signature in cursive script that reads "H. Tyrone Brandyburg". The signature is written in dark ink on a white background.

H. Tyrone Brandyburg  
Superintendent  
Harpers Ferry National Historical Park

#### **Attachments**

Assessment of Effect Form  
Supporting Documentation and Photographs  
Henkle Demolition Environmental Assessment  
Memorandum of Agreement

#### **References**

##### **National Park Service**

2005      *Allstadt Farm Cultural Landscapes Inventory*, United States Department of the Interior, National Park Service, National Capitol Region, Washington, D.C.

##### **National Register of Historic Places**

2016      Harpers Ferry National Historical Park (Boundary Increase), Harpers Ferry, Jefferson/Loudoun Counties, West Virginia/Virginia, National Register #16000238.



IN REPLY REFER TO:

# United States Department of the Interior

NATIONAL PARK SERVICE  
Harpers Ferry National Historical Park  
P.O. Box 65  
Harpers Ferry, West Virginia 25425

1.A.1 (HAFE-H4218)

July 27, 2022

Bill Harris  
Chief  
Catawba Indian Nation  
996 Avenue of the Nations  
Rock Hill, SC 29730

Subject: Introduction and Section 106 Consultation and Environmental Assessment for Demolition of Historic Structures on the Henkle Property (PEPC 76643), Harpers Ferry National Historical Park, Jefferson County, WV

Chief Harris:

On behalf of the Harpers Ferry National Historical Park (HAFE), I would like to introduce myself to you and to begin the process of establishing a relationship with the Catawba Indian Nation. As the Park superintendent, I manage approximately 3,750 acres of public land located in West Virginia, Maryland and Virginia. The Park is situated at the confluence of the Shenandoah and Potomac Rivers and contains a diverse array of cultural and natural resources. Although the Park is often associated with John Brown's Raid and the Civil War, it also tells stories associated with African American, industrial and transportation history. People have long been drawn to this unique geographical location and the abundance of natural resources.

I am committed to building a government-to-government relationship and consulting with you on Park projects. I also look forward to collaborating with you to better understand the values and significance that indigenous people attribute to the places that are now a part of the Harpers Ferry National Historical Park. Along with my staff, I am interested in working with you to establish meaningful connections to these places through your stories and your voice. I look forward to the opportunity to consult and collaborate with you on present and future projects and building our relationship. In the near future, I will be reaching out to you to provide a more comprehensive review of Harpers Ferry National Historical Park and to discuss some of the specific areas in which we would like to get your input. To begin our consulting relationship, I have included the Section 106 consultation and Environmental Assessment for an upcoming project involving the demolition of historic structures on Park land.

## **Section 106 Consultation Initiation**

The National Park Service (NPS), Harpers Ferry National Historical Park (HAFE) wishes to initiate consultation with the Catawba Indian Nation under Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) regarding the demolition of five historic structures, in accordance with 36 CFR 800.3 of the regulations of the Advisory Council on Historic Preservation (ACHP). This letter serves to inform the Catawba Indian Nation of HAFE's determination that the proposed undertaking will result in An Adverse Effect to historic properties. The NPS has consulted with the West Virginia State Historic Preservation Office (SHPO) which concurred with the NPS determination and entered into a Memorandum of Agreement to mitigate the effects.

## **Management Summary and Description of Undertaking**

HAFE proposes to demolish five structures associated with the Jacob "Furl" and Susan Allstadt Henkle Farmstead located in a wooded area on the School House Ridge South Battlefield. The five structures include a house, barn, silo, milk house and corncrib. The primary structure is a two-story balloon frame dwelling sheathed in German lap siding. It dates to the early twentieth century and is a typical two-story three-bay frame I-house with a side facing gable roof clad in standing seam metal. A projecting ell is attached to the rear of the house. The other four structures are within close vicinity of the house and are associated with the farmstead. Although it is collapsed, the ruins of the three-story barn still remain in place. The foundation consists of poured concrete, but the framing is made of heavy timbers with mortise-and-tendon joinery. A concrete block silo is attached to the barn and remains intact except for its roof. The milk house is also constructed of concrete blocks with a poured concrete floor. Lastly, the corn crib is constructed of milled lumber and is currently in ruins.

Currently, all five of the structures are in a severe state of disrepair and are considered a health and safety hazard. This demolition project intends to address the health and safety concerns by removing the structural portions of the buildings that pose a risk of fall damage or injury. Essentially, the superstructures will be removed, but as much as possible, the foundations of the historic buildings will remain in place. Furthermore, the surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.

Oral history suggests that the Henkle house was built sometime after 1906 by Jacob "Furl" Henkle. The property was operated as a farm and was part of a larger allotment owned by the Allstadt family including Jacob's mother, Susan Allstadt Henkle. After Susan's death in 1920, the property was sold to the Standard Lime & Stone Company. Thereafter, the farm was leased and used as the Standard Company Farm. Based upon construction techniques and design, the dairy barn, milk house, silo and corn crib probably date to after 1920 when the property was owned by the Standard Lime and Stone Company. From the 1920's until its



abandonment in the 1950's, the structures were updated and renovated as technology in the dairy industry changed.

### **Area of Potential Effect**

The area of potential effect (APE) for this project, encompasses the entire wooded area of the Henkle farmstead. All of the structures comprising the farmstead are proposed for removal, leaving only foundations and the cultural landscape intact. Because the structures are in a wooded area, the surrounding viewshed of the Schoolhouse Ridge Battlefield will not be affected.

### **Identification of Historic Properties**

The APE has been surveyed for cultural resources for the Harpers Ferry National Historical Park Historic District. Surveys were conducted as part of the National Register of Historic Places listing (boundary increase 2016) and a cultural landscape inventory. The house and the site are listed as contributing on the National Register. Other contributing elements to the Historic District within or adjacent to the APE include the Schoolhouse Ridge Battlefield and the John Hall Allstadt House Ruins.

### **Consultation and Potential Effects to Historic Properties**

Our analysis of the APE, research of the existing documentation, consultation with regional experts, and evaluation of the project scope leads us to conclude that the proposed project will have An Adverse Effect on historic properties under 36 CFR 800.5. Since the site and the house are contributing structures, mitigations are necessary to lessen the adverse effect. The following are mitigations that the park has placed on this demolition.

- The surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.
- Documentation of the site should include drawings and photographs.
- A Phase I archeological survey will be conducted prior to demolition.
- As much as possible, the foundations of the historic buildings will remain in place. The Park archeologist will monitor the demolition and work with the contractors to ensure the least amount of damage to the landscape. The scope of work for the demolition will specify criteria that excavation is not allowed and that the foundations must be protected. As much as possible, the foundations will be filled in with clean fill to stabilize and secure the site. If, in the process of demolition, a portion of the foundation collapses, the park archeologist will work with the contractor to ensure that the foundation remnants remain in place and no further collapses occur.

In accordance with the National Environmental Policy Act (NEPA), the NPS has prepared an environmental assessment (EA) that will address this project. The NPS intends to coordinate consultation and NEPA review per Advisory Council on Historic Preservation regulations 36CFR 800.8 and to consult with the public through our Planning, Environment, and Public Comment (PEPC) website.

This letter is accompanied by relevant supporting documentation that identifies the location of the project and additional details of the project. A list of references is also provided. Any of the referenced reports can be provided, upon request, in PDF format. If you have any questions, please feel free to contact Darlene Hassler, Cultural Resources Management Specialist, at 304-535-6188 or [darlene\\_hassler@NPS.gov](mailto:darlene_hassler@NPS.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "H. Tyrone Brandyburg". The signature is written in a cursive, flowing style.

H. Tyrone Brandyburg  
Superintendent  
Harpers Ferry National Historical Park

#### **Attachments**

Assessment of Effect Form  
Supporting Documentation and Photographs  
Henkle Demolition Environmental Assessment  
Memorandum of Agreement

#### **References**

##### **National Park Service**

2005      *Allstadt Farm Cultural Landscapes Inventory*, United States Department of the Interior, National Park Service, National Capitol Region, Washington, D.C.

##### **National Register of Historic Places**

2016      Harpers Ferry National Historical Park (Boundary Increase), Harpers Ferry, Jefferson/Loudoun Counties, West Virginia/Virginia, National Register #16000238.



IN REPLY REFER TO:

# United States Department of the Interior

NATIONAL PARK SERVICE  
Harpers Ferry National Historical Park  
P.O. Box 65  
Harpers Ferry, West Virginia 25425

1.A.1 (HAFE-H4218)

August 24, 2022

Stephen Adkins  
Chief  
Chickahominy Indian Tribe  
7240 Adkins Road  
Charles City, VA 23030

Subject: Introduction and Section 106 Consultation and Environmental Assessment for Demolition of Historic Structures on the Henkle Property (PEPC 76643), Harpers Ferry National Historical Park, Jefferson County, WV

Chief Adkins:

On behalf of the Harpers Ferry National Historical Park (HAFE), I would like to introduce myself to you and to begin the process of establishing a relationship with the Chickahominy Indian Tribe. As the Park superintendent, I manage approximately 3,750 acres of public land located in West Virginia, Maryland and Virginia. The Park is situated at the confluence of the Shenandoah and Potomac Rivers and contains a diverse array of cultural and natural resources. Although the Park is often associated with John Brown's Raid and the Civil War, it also tells stories associated with African American, industrial and transportation history. People have long been drawn to this unique geographical location and the abundance of natural resources.

I am committed to building a government-to-government relationship and consulting with you on Park projects. I also look forward to collaborating with you to better understand the values and significance that indigenous people attribute to the places that are now a part of the Harpers Ferry National Historical Park. The Chickahominy Indian tribal knowledge and long association with the Chesapeake landscape and Virginia waterways is beneficial to better understanding our history, landscape, and resources. In particular, the Shenandoah Valley where Harpers Ferry is located, is believed to have been part of an area of trade and migration for numerous indigenous groups. Along with my staff, I am interested in working with you to establish meaningful connections to these places through your stories and your voice. I look forward to the opportunity to consult and collaborate with you on present and future projects and building our relationship. In the near future, I will be reaching out to you to provide a more comprehensive review of Harpers Ferry National Historical Park and to discuss some of the specific areas in which we would like to get your input. To begin our consulting relationship, I have included the Section 106 consultation and Environmental

Assessment for an upcoming project involving the demolition of historic structures on Park land.

### **Section 106 Consultation Initiation**

The National Park Service (NPS), Harpers Ferry National Historical Park (HAFE) wishes to initiate consultation with the Chickahominy Indian Tribe under Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) regarding the demolition of five historic structures, in accordance with 36 CFR 800.3 of the regulations of the Advisory Council on Historic Preservation (ACHP). This letter serves to inform the Chickahominy Indian Tribe of HAFE's determination that the proposed undertaking will result in An Adverse Effect to historic properties. The NPS has consulted with the West Virginia State Historic Preservation Office (SHPO) which concurred with the NPS determination and entered into a Memorandum of Agreement to mitigate the effects.

### **Management Summary and Description of Undertaking**

HAFE proposes to demolish five structures associated with the Jacob "Furl" and Susan Allstadt Henkle Farmstead located in a wooded area on the School House Ridge South Battlefield. The five structures include a house, barn, silo, milk house and corncrib. The primary structure is a two-story balloon frame dwelling sheathed in German lap siding. It dates to the early twentieth century and is a typical two-story three-bay frame I-house with a side facing gable roof clad in standing seam metal. A projecting ell is attached to the rear of the house. The other four structures are within close vicinity of the house and are associated with the farmstead. Although it is collapsed, the ruins of the three-story barn still remain in place. The foundation consists of poured concrete, but the framing is made of heavy timbers with mortise-and-tendon joinery. A concrete block silo is attached to the barn and remains intact except for its roof. The milk house is also constructed of concrete blocks with a poured concrete floor. Lastly, the corn crib is constructed of milled lumber and is currently in ruins.

Currently, all five of the structures are in a severe state of disrepair and are considered a health and safety hazard. This demolition project intends to address the health and safety concerns by removing the structural portions of the buildings that pose a risk of fall damage or injury. Essentially, the superstructures will be removed, but as much as possible, the foundations of the historic buildings will remain in place. Furthermore, the surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.

Oral history suggests that the Henkle house was built sometime after 1906 by Jacob "Furl" Henkle. The property was operated as a farm and was part of a larger allotment owned by the Allstadt family including Jacob's mother, Susan Allstadt Henkle. After Susan's death in 1920, the property was sold to the Standard Lime & Stone Company. Thereafter, the farm was leased and used as the Standard Company Farm. Based upon construction techniques



and design, the dairy barn, milk house, silo and corn crib probably date to after 1920 when the property was owned by the Standard Lime and Stone Company. From the 1920's until its abandonment in the 1950's, the structures were updated and renovated as technology in the dairy industry changed.

### **Area of Potential Effect**

The area of potential effect (APE) for this project, encompasses the entire wooded area of the Henkle farmstead. All of the structures comprising the farmstead are proposed for removal, leaving only foundations and the cultural landscape intact. Because the structures are in a wooded area, the surrounding viewshed of the Schoolhouse Ridge Battlefield will not be affected.

### **Identification of Historic Properties**

The APE has been surveyed for cultural resources for the Harpers Ferry National Historical Park Historic District. Surveys were conducted as part of the National Register of Historic Places listing (boundary increase 2016) and a cultural landscape inventory. The house and the site are listed as contributing on the National Register. Other contributing elements to the Historic District within or adjacent to the APE include the Schoolhouse Ridge Battlefield and the John Hall Allstadt House Ruins.

### **Consultation and Potential Effects to Historic Properties**

Our analysis of the APE, research of the existing documentation, consultation with regional experts, and evaluation of the project scope leads us to conclude that the proposed project will have An Adverse Effect on historic properties under 36 CFR 800.5. Since the site and the house are contributing structures, mitigations are necessary to lessen the adverse effect. The following are mitigations that the park has placed on this demolition.

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- Documentation of the site should include drawings and photographs.
- A Phase I archeological survey will be conducted prior to demolition.
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Sincerely,

H. Tyrone Brandyburg  
Superintendent  
Harpers Ferry National Historical Park

#### **Attachments**

Assessment of Effect Form  
Supporting Documentation and Photographs  
Henkle Demolition Environmental Assessment  
Memorandum of Agreement

#### **References**

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##### **National Register of Historic Places**

2016      Harpers Ferry National Historical Park (Boundary Increase), Harpers Ferry, Jefferson/Loudoun Counties, West Virginia/Virginia, National Register #16000238.



IN REPLY REFER TO:

# United States Department of the Interior

NATIONAL PARK SERVICE  
Harpers Ferry National Historical Park  
P.O. Box 65  
Harpers Ferry, West Virginia 25425

1.A.1 (HAFE-H4218)

August 24, 2022

Gerald Stewart  
Chief  
Chickahominy Tribe Eastern Division  
1191 Indian Hill Lane  
Providence Forge, VA 23140

Subject: Introduction and Section 106 Consultation and Environmental Assessment for Demolition of Historic Structures on the Henkle Property (PEPC 76643), Harpers Ferry National Historical Park, Jefferson County, WV

Chief Stewart:

On behalf of the Harpers Ferry National Historical Park (HAFE), I would like to introduce myself to you and to begin the process of establishing a relationship with the Chickahominy Tribe Eastern Division. As the Park superintendent, I manage approximately 3,750 acres of public land located in West Virginia, Maryland and Virginia. The Park is situated at the confluence of the Shenandoah and Potomac Rivers and contains a diverse array of cultural and natural resources. Although the Park is often associated with John Brown's Raid and the Civil War, it also tells stories associated with African American, industrial and transportation history. People have long been drawn to this unique geographical location and the abundance of natural resources.

I am committed to building a government-to-government relationship and consulting with you on Park projects. I also look forward to collaborating with you to better understand the values and significance that indigenous people attribute to the places that are now a part of the Harpers Ferry National Historical Park. The Chickahominy Tribe Eastern Division knowledge and long association with the Chesapeake landscape and Virginia waterways is beneficial to better understanding our history, landscape, and resources. In particular, the Shenandoah Valley where Harpers Ferry is located, is believed to have been part of an area of trade and migration for numerous indigenous groups. Along with my staff, I am interested in working with you to establish meaningful connections to these places through your stories and your voice. I look forward to the opportunity to consult and collaborate with you on present and future projects and building our relationship. In the near future, I will be reaching out to you to provide a more comprehensive review of Harpers Ferry National Historical Park and to discuss some of the specific areas in which we would like to get your input. To begin our consulting relationship, I have included the Section 106 consultation and Environmental

Assessment for an upcoming project involving the demolition of historic structures on Park land.

### **Section 106 Consultation Initiation**

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### **Management Summary and Description of Undertaking**

HAFE proposes to demolish five structures associated with the Jacob "Furl" and Susan Allstadt Henkle Farmstead located in a wooded area on the School House Ridge South Battlefield. The five structures include a house, barn, silo, milk house and corncrib. The primary structure is a two-story balloon frame dwelling sheathed in German lap siding. It dates to the early twentieth century and is a typical two-story three-bay frame I-house with a side facing gable roof clad in standing seam metal. A projecting ell is attached to the rear of the house. The other four structures are within close vicinity of the house and are associated with the farmstead. Although it is collapsed, the ruins of the three-story barn still remain in place. The foundation consists of poured concrete, but the framing is made of heavy timbers with mortise-and-tendon joinery. A concrete block silo is attached to the barn and remains intact except for its roof. The milk house is also constructed of concrete blocks with a poured concrete floor. Lastly, the corn crib is constructed of milled lumber and is currently in ruins.

Currently, all five of the structures are in a severe state of disrepair and are considered a health and safety hazard. This demolition project intends to address the health and safety concerns by removing the structural portions of the buildings that pose a risk of fall damage or injury. Essentially, the superstructures will be removed, but as much as possible, the foundations of the historic buildings will remain in place. Furthermore, the surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.

Oral history suggests that the Henkle house was built sometime after 1906 by Jacob "Furl" Henkle. The property was operated as a farm and was part of a larger allotment owned by the Allstadt family including Jacob's mother, Susan Allstadt Henkle. After Susan's death in 1920, the property was sold to the Standard Lime & Stone Company. Thereafter, the farm was leased and used as the Standard Company Farm. Based upon construction techniques

and design, the dairy barn, milk house, silo and corn crib probably date to after 1920 when the property was owned by the Standard Lime and Stone Company. From the 1920's until its abandonment in the 1950's, the structures were updated and renovated as technology in the dairy industry changed.

### **Area of Potential Effect**

The area of potential effect (APE) for this project, encompasses the entire wooded area of the Henkle farmstead. All of the structures comprising the farmstead are proposed for removal, leaving only foundations and the cultural landscape intact. Because the structures are in a wooded area, the surrounding viewshed of the Schoolhouse Ridge Battlefield will not be affected.

### **Identification of Historic Properties**

The APE has been surveyed for cultural resources for the Harpers Ferry National Historical Park Historic District. Surveys were conducted as part of the National Register of Historic Places listing (boundary increase 2016) and a cultural landscape inventory. The house and the site are listed as contributing on the National Register. Other contributing elements to the Historic District within or adjacent to the APE include the Schoolhouse Ridge Battlefield and the John Hall Allstadt House Ruins.

### **Consultation and Potential Effects to Historic Properties**

Our analysis of the APE, research of the existing documentation, consultation with regional experts, and evaluation of the project scope leads us to conclude that the proposed project will have An Adverse Effect on historic properties under 36 CFR 800.5. Since the site and the house are contributing structures, mitigations are necessary to lessen the adverse effect. The following are mitigations that the park has placed on this demolition.

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In accordance with the National Environmental Policy Act (NEPA), the NPS has prepared an environmental assessment (EA) that will address this project. The NPS intends to coordinate consultation and NEPA review per Advisory Council on Historic Preservation regulations 36CFR 800.8 and to consult with the public through our Planning, Environment, and Public Comment (PEPC) website.

This letter is accompanied by relevant supporting documentation that identifies the location of the project and additional details of the project. A list of references is also provided. Any of the referenced reports can be provided, upon request, in PDF format. If you have any questions, please feel free to contact Darlene Hassler, Cultural Resources Management Specialist, at 304-535-6188 or [darlene\\_hassler@NPS.gov](mailto:darlene_hassler@NPS.gov).

Sincerely,

H. Tyrone Brandyburg  
Superintendent  
Harpers Ferry National Historical Park

#### **Attachments**

- Assessment of Effect Form
- Supporting Documentation and Photographs
- Henkle Demolition Environmental Assessment
- Memorandum of Agreement

#### **References**

##### **National Park Service**

2005      *Allstadt Farm Cultural Landscapes Inventory*, United States Department of the Interior, National Park Service, National Capitol Region, Washington, D.C.

##### **National Register of Historic Places**

2016      Harpers Ferry National Historical Park (Boundary Increase), Harpers Ferry, Jefferson/Loudoun Counties, West Virginia/Virginia, National Register #16000238.



IN REPLY REFER TO:

# United States Department of the Interior

NATIONAL PARK SERVICE  
Harpers Ferry National Historical Park  
P.O. Box 65  
Harpers Ferry, West Virginia 25425

1.A.1 (HAFE-H4218)

July 27, 2022

Deborah Dotson  
President  
Delaware Nation  
P.O. Box 825  
Anadarko, OK 73005

Subject: Introduction and Section 106 Consultation and Environmental Assessment for Demolition of Historic Structures on the Henkle Property (PEPC 76643), Harpers Ferry National Historical Park, Jefferson County, WV

President Dotson:

On behalf of the Harpers Ferry National Historical Park (HAFE), I would like to introduce myself to you and to begin the process of establishing a relationship with the Delaware Nation. As the Park superintendent, I manage approximately 3,750 acres of public land located in West Virginia, Maryland and Virginia. The Park is situated at the confluence of the Shenandoah and Potomac Rivers and contains a diverse array of cultural and natural resources. Although the Park is often associated with John Brown's Raid and the Civil War, it also tells stories associated with African American, industrial and transportation history. People have long been drawn to this unique geographical location and the abundance of natural resources.

I am committed to building a government-to-government relationship and consulting with you on Park projects. I also look forward to collaborating with you to better understand the values and significance that indigenous people attribute to the places that are now a part of the Harpers Ferry National Historical Park. Along with my staff, I am interested in working with you to establish meaningful connections to these places through your stories and your voice. I look forward to the opportunity to consult and collaborate with you on present and future projects and building our relationship. In the near future, I will be reaching out to you to provide a more comprehensive review of Harpers Ferry National Historical Park and to discuss some of the specific areas in which we would like to get your input. To begin our consulting relationship, I have included the Section 106 consultation and Environmental Assessment for an upcoming project involving the demolition of historic structures on Park land.

## **Section 106 Consultation Initiation**

The National Park Service (NPS), Harpers Ferry National Historical Park (HAFE) wishes to initiate consultation with the Delaware Nation under Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) regarding the demolition of five historic structures, in accordance with 36 CFR 800.3 of the regulations of the Advisory Council on Historic Preservation (ACHP). This letter serves to inform the Delaware Nation of HAFE's determination that the proposed undertaking will result in An Adverse Effect to historic properties. The NPS has consulted with the West Virginia State Historic Preservation Office (SHPO) which concurred with the NPS determination and entered into a Memorandum of Agreement to mitigate the effects.

## **Management Summary and Description of Undertaking**

HAFE proposes to demolish five structures associated with the Jacob "Furl" and Susan Allstadt Henkle Farmstead located in a wooded area on the School House Ridge South Battlefield. The five structures include a house, barn, silo, milk house and corncrib. The primary structure is a two-story balloon frame dwelling sheathed in German lap siding. It dates to the early twentieth century and is a typical two-story three-bay frame I-house with a side facing gable roof clad in standing seam metal. A projecting ell is attached to the rear of the house. The other four structures are within close vicinity of the house and are associated with the farmstead. Although it is collapsed, the ruins of the three-story barn still remain in place. The foundation consists of poured concrete, but the framing is made of heavy timbers with mortise-and-tendon joinery. A concrete block silo is attached to the barn and remains intact except for its roof. The milk house is also constructed of concrete blocks with a poured concrete floor. Lastly, the corn crib is constructed of milled lumber and is currently in ruins.

Currently, all five of the structures are in a severe state of disrepair and are considered a health and safety hazard. This demolition project intends to address the health and safety concerns by removing the structural portions of the buildings that pose a risk of fall damage or injury. Essentially, the superstructures will be removed, but as much as possible, the foundations of the historic buildings will remain in place. Furthermore, the surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.

Oral history suggests that the Henkle house was built sometime after 1906 by Jacob "Furl" Henkle. The property was operated as a farm and was part of a larger allotment owned by the Allstadt family including Jacob's mother, Susan Allstadt Henkle. After Susan's death in 1920, the property was sold to the Standard Lime & Stone Company. Thereafter, the farm was leased and used as the Standard Company Farm. Based upon construction techniques and design, the dairy barn, milk house, silo and corn crib probably date to after 1920 when the property was owned by the Standard Lime and Stone Company. From the 1920's until its

abandonment in the 1950's, the structures were updated and renovated as technology in the dairy industry changed.

### **Area of Potential Effect**

The area of potential effect (APE) for this project, encompasses the entire wooded area of the Henkle farmstead. All of the structures comprising the farmstead are proposed for removal, leaving only foundations and the cultural landscape intact. Because the structures are in a wooded area, the surrounding viewshed of the Schoolhouse Ridge Battlefield will not be affected.

### **Identification of Historic Properties**

The APE has been surveyed for cultural resources for the Harpers Ferry National Historical Park Historic District. Surveys were conducted as part of the National Register of Historic Places listing (boundary increase 2016) and a cultural landscape inventory. The house and the site are listed as contributing on the National Register. Other contributing elements to the Historic District within or adjacent to the APE include the Schoolhouse Ridge Battlefield and the John Hall Allstadt House Ruins.

### **Consultation and Potential Effects to Historic Properties**

Our analysis of the APE, research of the existing documentation, consultation with regional experts, and evaluation of the project scope leads us to conclude that the proposed project will have An Adverse Effect on historic properties under 36 CFR 800.5. Since the site and the house are contributing structures, mitigations are necessary to lessen the adverse effect. The following are mitigations that the park has placed on this demolition.

- The surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.
- Documentation of the site should include drawings and photographs.
- A Phase I archeological survey will be conducted prior to demolition.
- As much as possible, the foundations of the historic buildings will remain in place. The Park archeologist will monitor the demolition and work with the contractors to ensure the least amount of damage to the landscape. The scope of work for the demolition will specify criteria that excavation is not allowed and that the foundations must be protected. As much as possible, the foundations will be filled in with clean fill to stabilize and secure the site. If, in the process of demolition, a portion of the foundation collapses, the park archeologist will work with the contractor to ensure that the foundation remnants remain in place and no further collapses occur.

In accordance with the National Environmental Policy Act (NEPA), the NPS has prepared an environmental assessment (EA) that will address this project. The NPS intends to coordinate consultation and NEPA review per Advisory Council on Historic Preservation regulations 36CFR 800.8 and to consult with the public through our Planning, Environment, and Public Comment (PEPC) website.

This letter is accompanied by relevant supporting documentation that identifies the location of the project and additional details of the project. A list of references is also provided. Any of the referenced reports can be provided, upon request, in PDF format. If you have any questions, please feel free to contact Darlene Hassler, Cultural Resources Management Specialist, at 304-535-6188 or [darlene\\_hassler@NPS.gov](mailto:darlene_hassler@NPS.gov).

Sincerely,

A handwritten signature in cursive script that reads "H. Tyrone Brandyburg".

H. Tyrone Brandyburg  
Superintendent  
Harpers Ferry National Historical Park

#### **Attachments**

Assessment of Effect Form  
Supporting Documentation and Photographs  
Henkle Demolition Environmental Assessment  
Memorandum of Agreement

#### **References**

National Park Service

2005      *Allstadt Farm Cultural Landscapes Inventory*, United States Department of the Interior, National Park Service, National Capitol Region, Washington, D.C.

National Register of Historic Places

2016      Harpers Ferry National Historical Park (Boundary Increase), Harpers Ferry, Jefferson/Loudoun Counties, West Virginia/Virginia, National Register #16000238.





IN REPLY REFER TO:

# United States Department of the Interior

NATIONAL PARK SERVICE  
Harpers Ferry National Historical Park  
P.O. Box 65  
Harpers Ferry, West Virginia 25425

1.A.1 (HAFE-H4218)

August 24, 2022

Kenneth Branham  
Chief  
Monacan Indian Nation  
P.O. Box 960  
Amherst, VA 24521

Subject: Introduction and Section 106 Consultation and Environmental Assessment for Demolition of Historic Structures on the Henkle Property (PEPC 76643), Harpers Ferry National Historical Park, Jefferson County, WV

Chief Branham:

On behalf of the Harpers Ferry National Historical Park (HAFE), I would like to introduce myself to you and to begin the process of establishing a relationship with the Monacan Indian Nation. As the Park superintendent, I manage approximately 3,750 acres of public land located in West Virginia, Maryland and Virginia. The Park is situated at the confluence of the Shenandoah and Potomac Rivers and contains a diverse array of cultural and natural resources. Although the Park is often associated with John Brown's Raid and the Civil War, it also tells stories associated with African American, industrial and transportation history. People have long been drawn to this unique geographical location and the abundance of natural resources.

I am committed to building a government-to-government relationship and consulting with you on Park projects. I also look forward to collaborating with you to better understand the values and significance that indigenous people attribute to the places that are now a part of the Harpers Ferry National Historical Park. The Monacan Indian Nation's knowledge and long association with the Potomac River and its tributaries is beneficial to better understanding our history, landscape, and resources. In particular, the Shenandoah Valley where Harpers Ferry is located, is believed to have been part of an area of trade and migration for numerous indigenous groups. Along with my staff, I am interested in working with you to establish meaningful connections to these places through your stories and your voice. I look forward to the opportunity to consult and collaborate with you on present and future projects and building our relationship. In the near future, I will be reaching out to you to provide a more comprehensive review of Harpers Ferry National Historical Park and to discuss some of the specific areas in which we would like to get your input. To begin our consulting relationship, I have included the Section 106 consultation and Environmental Assessment for an upcoming project involving the demolition of historic structures on Park land.

## **Section 106 Consultation Initiation**

The National Park Service (NPS), Harpers Ferry National Historical Park (HAFE) wishes to initiate consultation with the Monacan Indian Nation under Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) regarding the demolition of five historic structures, in accordance with 36 CFR 800.3 of the regulations of the Advisory Council on Historic Preservation (ACHP). This letter serves to inform the Monacan Indian Nation of HAFE's determination that the proposed undertaking will result in An Adverse Effect to historic properties. The NPS has consulted with the West Virginia State Historic Preservation Office (SHPO) which concurred with the NPS determination and entered into a Memorandum of Agreement to mitigate the effects.

## **Management Summary and Description of Undertaking**

HAFE proposes to demolish five structures associated with the Jacob "Furl" and Susan Allstadt Henkle Farmstead located in a wooded area on the School House Ridge South Battlefield. The five structures include a house, barn, silo, milk house and corncrib. The primary structure is a two-story balloon frame dwelling sheathed in German lap siding. It dates to the early twentieth century and is a typical two-story three-bay frame I-house with a side facing gable roof clad in standing seam metal. A projecting ell is attached to the rear of the house. The other four structures are within close vicinity of the house and are associated with the farmstead. Although it is collapsed, the ruins of the three-story barn still remain in place. The foundation consists of poured concrete, but the framing is made of heavy timbers with mortise-and-tendon joinery. A concrete block silo is attached to the barn and remains intact except for its roof. The milk house is also constructed of concrete blocks with a poured concrete floor. Lastly, the corn crib is constructed of milled lumber and is currently in ruins.

Currently, all five of the structures are in a severe state of disrepair and are considered a health and safety hazard. This demolition project intends to address the health and safety concerns by removing the structural portions of the buildings that pose a risk of fall damage or injury. Essentially, the superstructures will be removed, but as much as possible, the foundations of the historic buildings will remain in place. Furthermore, the surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.

Oral history suggests that the Henkle house was built sometime after 1906 by Jacob "Furl" Henkle. The property was operated as a farm and was part of a larger allotment owned by the Allstadt family including Jacob's mother, Susan Allstadt Henkle. After Susan's death in 1920, the property was sold to the Standard Lime & Stone Company. Thereafter, the farm was leased and used as the Standard Company Farm. Based upon construction techniques and design, the dairy barn, milk house, silo and corn crib probably date to after 1920 when the property was owned by the Standard Lime and Stone Company. From the 1920's until its

abandonment in the 1950's, the structures were updated and renovated as technology in the dairy industry changed.

### **Area of Potential Effect**

The area of potential effect (APE) for this project, encompasses the entire wooded area of the Henkle farmstead. All of the structures comprising the farmstead are proposed for removal, leaving only foundations and the cultural landscape intact. Because the structures are in a wooded area, the surrounding viewshed of the Schoolhouse Ridge Battlefield will not be affected.

### **Identification of Historic Properties**

The APE has been surveyed for cultural resources for the Harpers Ferry National Historical Park Historic District. Surveys were conducted as part of the National Register of Historic Places listing (boundary increase 2016) and a cultural landscape inventory. The house and the site are listed as contributing on the National Register. Other contributing elements to the Historic District within or adjacent to the APE include the Schoolhouse Ridge Battlefield and the John Hall Allstadt House Ruins.

### **Consultation and Potential Effects to Historic Properties**

Our analysis of the APE, research of the existing documentation, consultation with regional experts, and evaluation of the project scope leads us to conclude that the proposed project will have An Adverse Effect on historic properties under 36 CFR 800.5. Since the site and the house are contributing structures, mitigations are necessary to lessen the adverse effect. The following are mitigations that the park has placed on this demolition.

- The surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.
- Documentation of the site should include drawings and photographs.
- A Phase I archeological survey will be conducted prior to demolition.
- As much as possible, the foundations of the historic buildings will remain in place. The Park archeologist will monitor the demolition and work with the contractors to ensure the least amount of damage to the landscape. The scope of work for the demolition will specify criteria that excavation is not allowed and that the foundations must be protected. As much as possible, the foundations will be filled in with clean fill to stabilize and secure the site. If, in the process of demolition, a portion of the foundation collapses, the park archeologist will work with the contractor to ensure that the foundation remnants remain in place and no further collapses occur.

In accordance with the National Environmental Policy Act (NEPA), the NPS has prepared an environmental assessment (EA) that will address this project. The NPS intends to coordinate consultation and NEPA review per Advisory Council on Historic Preservation regulations 36CFR 800.8 and to consult with the public through our Planning, Environment, and Public Comment (PEPC) website.

This letter is accompanied by relevant supporting documentation that identifies the location of the project and additional details of the project. A list of references is also provided. Any of the referenced reports can be provided, upon request, in PDF format. If you have any questions, please feel free to contact Darlene Hassler, Cultural Resources Management Specialist, at 304-535-6188 or [darlene\\_hassler@NPS.gov](mailto:darlene_hassler@NPS.gov).

Sincerely,

H. Tyrone Brandyburg  
Superintendent  
Harpers Ferry National Historical Park

#### **Attachments**

Assessment of Effect Form  
Supporting Documentation and Photographs  
Henkle Demolition Environmental Assessment  
Memorandum of Agreement

#### **References**

National Park Service

2005      *Allstadt Farm Cultural Landscapes Inventory*, United States Department of the Interior, National Park Service, National Capitol Region, Washington, D.C.

National Register of Historic Places

2016      Harpers Ferry National Historical Park (Boundary Increase), Harpers Ferry, Jefferson/Loudoun Counties, West Virginia/Virginia, National Register #16000238.



IN REPLY REFER TO:

# United States Department of the Interior

NATIONAL PARK SERVICE  
Harpers Ferry National Historical Park  
P.O. Box 65  
Harpers Ferry, West Virginia 25425

1.A.1 (HAFE-H4218)

August 24, 2022

Keith F. Anderson  
Chief  
Nansemond Indian Nation  
1001 Pembroke Lane  
Suffolk, VA 23434

Subject: Introduction and Section 106 Consultation and Environmental Assessment for Demolition of Historic Structures on the Henkle Property (PEPC 76643), Harpers Ferry National Historical Park, Jefferson County, WV

Chief Anderson:

On behalf of the Harpers Ferry National Historical Park (HAFE), I would like to introduce myself to you and to begin the process of establishing a relationship with the Nansemond Indian Nation. As the Park superintendent, I manage approximately 3,750 acres of public land located in West Virginia, Maryland and Virginia. The Park is situated at the confluence of the Shenandoah and Potomac Rivers and contains a diverse array of cultural and natural resources. Although the Park is often associated with John Brown's Raid and the Civil War, it also tells stories associated with African American, industrial and transportation history. People have long been drawn to this unique geographical location and the abundance of natural resources.

I am committed to building a government-to-government relationship and consulting with you on Park projects. I also look forward to collaborating with you to better understand the values and significance that indigenous people attribute to the places that are now a part of the Harpers Ferry National Historical Park. The Nansemond Indian Nation's knowledge and long association with the Chesapeake landscape and Virginia waterways is beneficial to better understanding our history, landscape, and resources. In particular, the Shenandoah Valley where Harpers Ferry is located, is believed to have been part of an area of trade and migration for numerous indigenous groups. Along with my staff, I am interested in working with you to establish meaningful connections to these places through your stories and your voice. I look forward to the opportunity to consult and collaborate with you on present and future projects and building our relationship. In the near future, I will be reaching out to you to provide a more comprehensive review of Harpers Ferry National Historical Park and to discuss some of the specific areas in which we would like to get your input. To begin our consulting relationship, I have included the Section 106 consultation and Environmental



Assessment for an upcoming project involving the demolition of historic structures on Park land.

## **Section 106 Consultation Initiation**

The National Park Service (NPS), Harpers Ferry National Historical Park (HAFE) wishes to initiate consultation with the Nansemond Indian Nation under Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) regarding the demolition of five historic structures, in accordance with 36 CFR 800.3 of the regulations of the Advisory Council on Historic Preservation (ACHP). This letter serves to inform the Nansemond Indian Nation of HAFE's determination that the proposed undertaking will result in An Adverse Effect to historic properties. The NPS has consulted with the West Virginia State Historic Preservation Office (SHPO) which concurred with the NPS determination and entered into a Memorandum of Agreement to mitigate the effects.

## **Management Summary and Description of Undertaking**

HAFE proposes to demolish five structures associated with the Jacob "Furl" and Susan Allstadt Henkle Farmstead located in a wooded area on the School House Ridge South Battlefield. The five structures include a house, barn, silo, milk house and corncrib. The primary structure is a two-story balloon frame dwelling sheathed in German lap siding. It dates to the early twentieth century and is a typical two-story three-bay frame I-house with a side facing gable roof clad in standing seam metal. A projecting ell is attached to the rear of the house. The other four structures are within close vicinity of the house and are associated with the farmstead. Although it is collapsed, the ruins of the three-story barn still remain in place. The foundation consists of poured concrete, but the framing is made of heavy timbers with mortise-and-tendon joinery. A concrete block silo is attached to the barn and remains intact except for its roof. The milk house is also constructed of concrete blocks with a poured concrete floor. Lastly, the corn crib is constructed of milled lumber and is currently in ruins.

Currently, all five of the structures are in a severe state of disrepair and are considered a health and safety hazard. This demolition project intends to address the health and safety concerns by removing the structural portions of the buildings that pose a risk of fall damage or injury. Essentially, the superstructures will be removed, but as much as possible, the foundations of the historic buildings will remain in place. Furthermore, the surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.

Oral history suggests that the Henkle house was built sometime after 1906 by Jacob "Furl" Henkle. The property was operated as a farm and was part of a larger allotment owned by the Allstadt family including Jacob's mother, Susan Allstadt Henkle. After Susan's death in 1920, the property was sold to the Standard Lime & Stone Company. Thereafter, the farm was leased and used as the Standard Company Farm. Based upon construction techniques

and design, the dairy barn, milk house, silo and corn crib probably date to after 1920 when the property was owned by the Standard Lime and Stone Company. From the 1920's until its abandonment in the 1950's, the structures were updated and renovated as technology in the dairy industry changed.

### **Area of Potential Effect**

The area of potential effect (APE) for this project, encompasses the entire wooded area of the Henkle farmstead. All of the structures comprising the farmstead are proposed for removal, leaving only foundations and the cultural landscape intact. Because the structures are in a wooded area, the surrounding viewshed of the Schoolhouse Ridge Battlefield will not be affected.

### **Identification of Historic Properties**

The APE has been surveyed for cultural resources for the Harpers Ferry National Historical Park Historic District. Surveys were conducted as part of the National Register of Historic Places listing (boundary increase 2016) and a cultural landscape inventory. The house and the site are listed as contributing on the National Register. Other contributing elements to the Historic District within or adjacent to the APE include the Schoolhouse Ridge Battlefield and the John Hall Allstadt House Ruins.

### **Consultation and Potential Effects to Historic Properties**

Our analysis of the APE, research of the existing documentation, consultation with regional experts, and evaluation of the project scope leads us to conclude that the proposed project will have An Adverse Effect on historic properties under 36 CFR 800.5. Since the site and the house are contributing structures, mitigations are necessary to lessen the adverse effect. The following are mitigations that the park has placed on this demolition.

- The surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.
- Documentation of the site should include drawings and photographs.
- A Phase I archeological survey will be conducted prior to demolition.
- As much as possible, the foundations of the historic buildings will remain in place. The Park archeologist will monitor the demolition and work with the contractors to ensure the least amount of damage to the landscape. The scope of work for the demolition will specify criteria that excavation is not allowed and that the foundations must be protected. As much as possible, the foundations will be filled in with clean fill to stabilize and secure the site. If, in the process of demolition, a portion of the foundation collapses, the park archeologist will work with the contractor to ensure that the foundation remnants remain in place and no further collapses occur.

In accordance with the National Environmental Policy Act (NEPA), the NPS has prepared an environmental assessment (EA) that will address this project. The NPS intends to coordinate consultation and NEPA review per Advisory Council on Historic Preservation regulations 36CFR 800.8 and to consult with the public through our Planning, Environment, and Public Comment (PEPC) website.

This letter is accompanied by relevant supporting documentation that identifies the location of the project and additional details of the project. A list of references is also provided. Any of the referenced reports can be provided, upon request, in PDF format. If you have any questions, please feel free to contact Darlene Hassler, Cultural Resources Management Specialist, at 304-535-6188 or [darlene\\_hassler@NPS.gov](mailto:darlene_hassler@NPS.gov).

Sincerely,

H. Tyrone Brandyburg  
Superintendent  
Harpers Ferry National Historical Park

#### **Attachments**

- Assessment of Effect Form
- Supporting Documentation and Photographs
- Henkle Demolition Environmental Assessment
- Memorandum of Agreement

#### **References**

##### **National Park Service**

2005      *Allstadt Farm Cultural Landscapes Inventory*, United States Department of the Interior, National Park Service, National Capitol Region, Washington, D.C.

##### **National Register of Historic Places**

2016      Harpers Ferry National Historical Park (Boundary Increase), Harpers Ferry, Jefferson/Loudoun Counties, West Virginia/Virginia, National Register #16000238.



IN REPLY REFER TO:

# United States Department of the Interior

NATIONAL PARK SERVICE  
Harpers Ferry National Historical Park  
P.O. Box 65  
Harpers Ferry, West Virginia 25425

1.A.1 (HAFE-H4218)

July 27, 2022

Robert Gray  
Chief  
Pamunkey Indian Tribe  
1054 Pocahontas Trail  
King William, VA 23086

Subject: Introduction and Section 106 Consultation and Environmental Assessment for Demolition of Historic Structures on the Henkle Property (PEPC 76643), Harpers Ferry National Historical Park, Jefferson County, WV

Chief Gray:

On behalf of the Harpers Ferry National Historical Park (HAFE), I would like to introduce myself to you and to begin the process of establishing a relationship with the Pamunkey Indian Tribe. As the Park superintendent, I manage approximately 3,750 acres of public land located in West Virginia, Maryland and Virginia. The Park is situated at the confluence of the Shenandoah and Potomac Rivers and contains a diverse array of cultural and natural resources. Although the Park is often associated with John Brown's Raid and the Civil War, it also tells stories associated with African American, industrial and transportation history. People have long been drawn to this unique geographical location and the abundance of natural resources.

I am committed to building a government-to-government relationship and consulting with you on Park projects. I also look forward to collaborating with you to better understand the values and significance that indigenous people attribute to the places that are now a part of the Harpers Ferry National Historical Park. Along with my staff, I am interested in working with you to establish meaningful connections to these places through your stories and your voice. I look forward to the opportunity to consult and collaborate with you on present and future projects and building our relationship. In the near future, I will be reaching out to you to provide a more comprehensive review of Harpers Ferry National Historical Park and to discuss some of the specific areas in which we would like to get your input. To begin our consulting relationship, I have included the Section 106 consultation and Environmental Assessment for an upcoming project involving the demolition of historic structures on Park land.

## **Section 106 Consultation Initiation**

The National Park Service (NPS), Harpers Ferry National Historical Park (HAFE) wishes to initiate consultation with the Pamunkey Indian Tribe under Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) regarding the demolition of five historic structures, in accordance with 36 CFR 800.3 of the regulations of the Advisory Council on Historic Preservation (ACHP). This letter serves to inform the Pamunkey Indian Tribe of HAFE's determination that the proposed undertaking will result in An Adverse Effect to historic properties. The NPS has consulted with the West Virginia State Historic Preservation Office (SHPO) which concurred with the NPS determination and entered into a Memorandum of Agreement to mitigate the effects.

## **Management Summary and Description of Undertaking**

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Oral history suggests that the Henkle house was built sometime after 1906 by Jacob "Furl" Henkle. The property was operated as a farm and was part of a larger allotment owned by the Allstadt family including Jacob's mother, Susan Allstadt Henkle. After Susan's death in 1920, the property was sold to the Standard Lime & Stone Company. Thereafter, the farm was leased and used as the Standard Company Farm. Based upon construction techniques and design, the dairy barn, milk house, silo and corn crib probably date to after 1920 when the property was owned by the Standard Lime and Stone Company. From the 1920's until its



abandonment in the 1950's, the structures were updated and renovated as technology in the dairy industry changed.

### **Area of Potential Effect**

The area of potential effect (APE) for this project, encompasses the entire wooded area of the Henkle farmstead. All of the structures comprising the farmstead are proposed for removal, leaving only foundations and the cultural landscape intact. Because the structures are in a wooded area, the surrounding viewshed of the Schoolhouse Ridge Battlefield will not be affected.

### **Identification of Historic Properties**

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### **Consultation and Potential Effects to Historic Properties**

Our analysis of the APE, research of the existing documentation, consultation with regional experts, and evaluation of the project scope leads us to conclude that the proposed project will have An Adverse Effect on historic properties under 36 CFR 800.5. Since the site and the house are contributing structures, mitigations are necessary to lessen the adverse effect. The following are mitigations that the park has placed on this demolition.

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- Documentation of the site should include drawings and photographs.
- A Phase I archeological survey will be conducted prior to demolition.
- As much as possible, the foundations of the historic buildings will remain in place. The Park archeologist will monitor the demolition and work with the contractors to ensure the least amount of damage to the landscape. The scope of work for the demolition will specify criteria that excavation is not allowed and that the foundations must be protected. As much as possible, the foundations will be filled in with clean fill to stabilize and secure the site. If, in the process of demolition, a portion of the foundation collapses, the park archeologist will work with the contractor to ensure that the foundation remnants remain in place and no further collapses occur.

In accordance with the National Environmental Policy Act (NEPA), the NPS has prepared an environmental assessment (EA) that will address this project. The NPS intends to coordinate consultation and NEPA review per Advisory Council on Historic Preservation regulations 36CFR 800.8 and to consult with the public through our Planning, Environment, and Public Comment (PEPC) website.

This letter is accompanied by relevant supporting documentation that identifies the location of the project and additional details of the project. A list of references is also provided. Any of the referenced reports can be provided, upon request, in PDF format. If you have any questions, please feel free to contact Darlene Hassler, Cultural Resources Management Specialist, at 304-535-6188 or [darlene\\_hassler@NPS.gov](mailto:darlene_hassler@NPS.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "H. Tyrone Brandyburg". The signature is fluid and cursive, with the first name "H." being small and the last name "Brandyburg" being larger and more prominent.

H. Tyrone Brandyburg  
Superintendent  
Harpers Ferry National Historical Park

#### **Attachments**

Assessment of Effect Form  
Supporting Documentation and Photographs  
Henkle Demolition Environmental Assessment  
Memorandum of Agreement

#### **References**

##### **National Park Service**

2005      *Allstadt Farm Cultural Landscapes Inventory*, United States Department of the Interior, National Park Service, National Capitol Region, Washington, D.C.

##### **National Register of Historic Places**

2016      Harpers Ferry National Historical Park (Boundary Increase), Harpers Ferry, Jefferson/Loudoun Counties, West Virginia/Virginia, National Register #16000238.

[EXTERNAL] RE: tribal consultation project initiation

Shaleigh Howells <shaleigh.howells@pamunkey.org>

Wed 8/3/2022 11:39 PM

To: Hassler, Darlene <Darlene\_Hassler@nps.gov>

Cc: Gray, Robert <robert.gray@pamunkey.org>; Brandyburg, Tyrone <Tyrone\_Brandyburg@nps.gov>

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

Good evening Darlene,

Thank you for your outreach on this project. The Pamunkey Indian Tribe does not have any comments to share at this time based on the current scope of the proposed project. However, we ask to be notified in the event of inadvertent discovery in connection with site activity.

Respectfully,

**Shaleigh R. Howells**

"SHAY-lee" ■ she/her/hers

Cultural Resource Director and Museum Director

Pamunkey Indian Tribal Resource Office

1054 Pocahontas Trail, King William, VA 23086

Phone: 804.885.5207 Fax: 866.422.3387

[www.pamunkey.org](http://www.pamunkey.org)



Indian Museum & Cultural Center  
Pamunkey Indian Reservation  
175 Lay Landing Road, King William, VA 23086  
804.843.4792 | [Museum@Pamunkey.org](mailto:Museum@Pamunkey.org)

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**From:** Robert Gray <robert.gray@pamunkey.org>

**Sent:** Tuesday, August 2, 2022 6:04 PM

**To:** Shaleigh Howells <shaleigh.howells@pamunkey.org>

**Subject:** Fw: tribal consultation project initiation

Robert Gray, Chief

Pamunkey Indian Tribe

---

**From:** Hassler, Darlene <[Darlene\\_Hassler@nps.gov](mailto:Darlene_Hassler@nps.gov)>

**Sent:** Tuesday, August 2, 2022 4:56 PM

**To:** Robert Gray <[robert.gray@pamunkey.org](mailto:robert.gray@pamunkey.org)>; Pamunkey Tribe <[pamunkeytribe@pamunkey.org](mailto:pamunkeytribe@pamunkey.org)>

**Subject:** tribal consultation project initiation

Chief Gray,

On behalf of Tyrone Brandyburg, Superintendent of the Harpers Ferry National Historical Park, please see the attached documentation for tribal consultation initiation for Section 106 and Environmental assessment of a demolition within Park boundaries. Please feel free to reach out to Superintendent Brandyburg at [Tyrone\\_Brandyburg@NPS.gov](mailto:Tyrone_Brandyburg@NPS.gov) or 304-535-6224. You may also contact me if you or your staff have any project specific questions or concerns.

Thank you,

Darlene Hassler  
Cultural Resources Management Specialist  
Archaeologist  
Harpers Ferry National Historical Park  
304-535-6188 (office)  
**Email is the best method to reach me.**



IN REPLY REFER TO:

# United States Department of the Interior

NATIONAL PARK SERVICE  
Harpers Ferry National Historical Park  
P.O. Box 65  
Harpers Ferry, West Virginia 25425

1.A.1 (HAFE-H4218)

August 24, 2022

Anne Richardson  
Chief  
Rappahannock Tribe  
5036 Indian Neck Road  
Indian Neck, VA 23148

Subject: Introduction and Section 106 Consultation and Environmental Assessment for Demolition of Historic Structures on the Henkle Property (PEPC 76643), Harpers Ferry National Historical Park, Jefferson County, WV

Chief Richardson:

On behalf of the Harpers Ferry National Historical Park (HAFE), I would like to introduce myself to you and to begin the process of establishing a relationship with the Rappahannock Tribe. As the Park superintendent, I manage approximately 3,750 acres of public land located in West Virginia, Maryland and Virginia. The Park is situated at the confluence of the Shenandoah and Potomac Rivers and contains a diverse array of cultural and natural resources. Although the Park is often associated with John Brown's Raid and the Civil War, it also tells stories associated with African American, industrial and transportation history. People have long been drawn to this unique geographical location and the abundance of natural resources.

I am committed to building a government-to-government relationship and consulting with you on Park projects. I also look forward to collaborating with you to better understand the values and significance that indigenous people attribute to the places that are now a part of the Harpers Ferry National Historical Park. The Rappahannock Tribal knowledge and long association with the Chesapeake landscape and Virginia waterways is beneficial to better understanding our history, landscape, and resources. In particular, the Shenandoah Valley where Harpers Ferry is located, is believed to have been part of an area of trade and migration for numerous indigenous groups. Along with my staff, I am interested in working with you to establish meaningful connections to these places through your stories and your voice. I look forward to the opportunity to consult and collaborate with you on present and future projects and building our relationship. In the near future, I will be reaching out to you to provide a more comprehensive review of Harpers Ferry National Historical Park and to discuss some of the specific areas in which we would like to get your input. To begin our consulting relationship, I have included the Section 106 consultation and Environmental

Assessment for an upcoming project involving the demolition of historic structures on Park land.

### **Section 106 Consultation Initiation**

The National Park Service (NPS), Harpers Ferry National Historical Park (HAFE) wishes to initiate consultation with the Rappahannock Tribe under Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) regarding the demolition of five historic structures, in accordance with 36 CFR 800.3 of the regulations of the Advisory Council on Historic Preservation (ACHP). This letter serves to inform the Rappahannock Tribe of HAFE's determination that the proposed undertaking will result in An Adverse Effect to historic properties. The NPS has consulted with the West Virginia State Historic Preservation Office (SHPO) which concurred with the NPS determination and entered into a Memorandum of Agreement to mitigate the effects.

### **Management Summary and Description of Undertaking**

HAFE proposes to demolish five structures associated with the Jacob "Furl" and Susan Allstadt Henkle Farmstead located in a wooded area on the School House Ridge South Battlefield. The five structures include a house, barn, silo, milk house and corncrib. The primary structure is a two-story balloon frame dwelling sheathed in German lap siding. It dates to the early twentieth century and is a typical two-story three-bay frame I-house with a side facing gable roof clad in standing seam metal. A projecting ell is attached to the rear of the house. The other four structures are within close vicinity of the house and are associated with the farmstead. Although it is collapsed, the ruins of the three-story barn still remain in place. The foundation consists of poured concrete, but the framing is made of heavy timbers with mortise-and-tendon joinery. A concrete block silo is attached to the barn and remains intact except for its roof. The milk house is also constructed of concrete blocks with a poured concrete floor. Lastly, the corn crib is constructed of milled lumber and is currently in ruins.

Currently, all five of the structures are in a severe state of disrepair and are considered a health and safety hazard. This demolition project intends to address the health and safety concerns by removing the structural portions of the buildings that pose a risk of fall damage or injury. Essentially, the superstructures will be removed, but as much as possible, the foundations of the historic buildings will remain in place. Furthermore, the surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.

Oral history suggests that the Henkle house was built sometime after 1906 by Jacob "Furl" Henkle. The property was operated as a farm and was part of a larger allotment owned by the Allstadt family including Jacob's mother, Susan Allstadt Henkle. After Susan's death in 1920, the property was sold to the Standard Lime & Stone Company. Thereafter, the farm was leased and used as the Standard Company Farm. Based upon construction techniques

and design, the dairy barn, milk house, silo and corn crib probably date to after 1920 when the property was owned by the Standard Lime and Stone Company. From the 1920's until its abandonment in the 1950's, the structures were updated and renovated as technology in the dairy industry changed.

### **Area of Potential Effect**

The area of potential effect (APE) for this project, encompasses the entire wooded area of the Henkle farmstead. All of the structures comprising the farmstead are proposed for removal, leaving only foundations and the cultural landscape intact. Because the structures are in a wooded area, the surrounding viewshed of the Schoolhouse Ridge Battlefield will not be affected.

### **Identification of Historic Properties**

The APE has been surveyed for cultural resources for the Harpers Ferry National Historical Park Historic District. Surveys were conducted as part of the National Register of Historic Places listing (boundary increase 2016) and a cultural landscape inventory. The house and the site are listed as contributing on the National Register. Other contributing elements to the Historic District within or adjacent to the APE include the Schoolhouse Ridge Battlefield and the John Hall Allstadt House Ruins.

### **Consultation and Potential Effects to Historic Properties**

Our analysis of the APE, research of the existing documentation, consultation with regional experts, and evaluation of the project scope leads us to conclude that the proposed project will have An Adverse Effect on historic properties under 36 CFR 800.5. Since the site and the house are contributing structures, mitigations are necessary to lessen the adverse effect. The following are mitigations that the park has placed on this demolition.

- The surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.
- Documentation of the site should include drawings and photographs.
- A Phase I archeological survey will be conducted prior to demolition.
- As much as possible, the foundations of the historic buildings will remain in place. The Park archeologist will monitor the demolition and work with the contractors to ensure the least amount of damage to the landscape. The scope of work for the demolition will specify criteria that excavation is not allowed and that the foundations must be protected. As much as possible, the foundations will be filled in with clean fill to stabilize and secure the site. If, in the process of demolition, a portion of the foundation collapses, the park archeologist will work with the contractor to ensure that the foundation remnants remain in place and no further collapses occur.



In accordance with the National Environmental Policy Act (NEPA), the NPS has prepared an environmental assessment (EA) that will address this project. The NPS intends to coordinate consultation and NEPA review per Advisory Council on Historic Preservation regulations 36CFR 800.8 and to consult with the public through our Planning, Environment, and Public Comment (PEPC) website.

This letter is accompanied by relevant supporting documentation that identifies the location of the project and additional details of the project. A list of references is also provided. Any of the referenced reports can be provided, upon request, in PDF format. If you have any questions, please feel free to contact Darlene Hassler, Cultural Resources Management Specialist, at 304-535-6188 or [darlene\\_hassler@NPS.gov](mailto:darlene_hassler@NPS.gov).

Sincerely,

H. Tyrone Brandyburg  
Superintendent  
Harpers Ferry National Historical Park

#### **Attachments**

- Assessment of Effect Form
- Supporting Documentation and Photographs
- Henkle Demolition Environmental Assessment
- Memorandum of Agreement

#### **References**

##### **National Park Service**

2005      *Allstadt Farm Cultural Landscapes Inventory*, United States Department of the Interior, National Park Service, National Capitol Region, Washington, D.C.

##### **National Register of Historic Places**

2016      Harpers Ferry National Historical Park (Boundary Increase), Harpers Ferry, Jefferson/Loudoun Counties, West Virginia/Virginia, National Register #16000238.



IN REPLY REFER TO:

## United States Department of the Interior

NATIONAL PARK SERVICE  
Harpers Ferry National Historical Park  
P.O. Box 65  
Harpers Ferry, West Virginia 25425

1.A.1 (HAFE-H4218)

July 27, 2022

Benjamin Barnes  
Chief  
Shawnee Tribe  
29 South Highway 69 A  
Miami, OK 74354

Subject: Introduction and Section 106 Consultation and Environmental Assessment for Demolition of Historic Structures on the Henkle Property (PEPC 76643), Harpers Ferry National Historical Park, Jefferson County, WV

Chief Barnes:

On behalf of the Harpers Ferry National Historical Park (HAFE), I would like to introduce myself to you and to begin the process of establishing a relationship with the Shawnee Tribe. As the Park superintendent, I manage approximately 3,750 acres of public land located in West Virginia, Maryland and Virginia. The Park is situated at the confluence of the Shenandoah and Potomac Rivers and contains a diverse array of cultural and natural resources. Although the Park is often associated with John Brown's Raid and the Civil War, it also tells stories associated with African American, industrial and transportation history. People have long been drawn to this unique geographical location and the abundance of natural resources.

I am committed to building a government-to-government relationship and consulting with you on Park projects. I also look forward to collaborating with you to better understand the values and significance that indigenous people attribute to the places that are now a part of the Harpers Ferry National Historical Park. Along with my staff, I am interested in working with you to establish meaningful connections to these places through your stories and your voice. I look forward to the opportunity to consult and collaborate with you on present and future projects and building our relationship. In the near future, I will be reaching out to you to provide a more comprehensive review of Harpers Ferry National Historical Park and to discuss some of the specific areas in which we would like to get your input. To begin our consulting relationship, I have included the Section 106 consultation and Environmental

Assessment for an upcoming project involving the demolition of historic structures on Park land.

## **Section 106 Consultation Initiation**

The National Park Service (NPS), Harpers Ferry National Historical Park (HAFE) wishes to initiate consultation with the Shawnee Tribe under Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) regarding the demolition of five historic structures, in accordance with 36 CFR 800.3 of the regulations of the Advisory Council on Historic Preservation (ACHP). This letter serves to inform the Shawnee Tribe of HAFE's determination that the proposed undertaking will result in An Adverse Effect to historic properties. The NPS has consulted with the West Virginia State Historic Preservation Office (SHPO) which concurred with the NPS determination and entered into a Memorandum of Agreement to mitigate the effects.

## **Management Summary and Description of Undertaking**

HAFE proposes to demolish five structures associated with the Jacob "Furl" and Susan Allstadt Henkle Farmstead located in a wooded area on the School House Ridge South Battlefield. The five structures include a house, barn, silo, milk house and corncrib. The primary structure is a two-story balloon frame dwelling sheathed in German lap siding. It dates to the early twentieth century and is a typical two-story three-bay frame I-house with a side facing gable roof clad in standing seam metal. A projecting ell is attached to the rear of the house. The other four structures are within close vicinity of the house and are associated with the farmstead. Although it is collapsed, the ruins of the three-story barn still remain in place. The foundation consists of poured concrete, but the framing is made of heavy timbers with mortise-and-tendon joinery. A concrete block silo is attached to the barn and remains intact except for its roof. The milk house is also constructed of concrete blocks with a poured concrete floor. Lastly, the corn crib is constructed of milled lumber and is currently in ruins.

Currently, all five of the structures are in a severe state of disrepair and are considered a health and safety hazard. This demolition project intends to address the health and safety concerns by removing the structural portions of the buildings that pose a risk of fall damage or injury. Essentially, the superstructures will be removed, but as much as possible, the foundations of the historic buildings will remain in place. Furthermore, the surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.

Oral history suggests that the Henkle house was built sometime after 1906 by Jacob "Furl" Henkle. The property was operated as a farm and was part of a larger allotment owned by the Allstadt family including Jacob's mother, Susan Allstadt Henkle. After Susan's death in 1920, the property was sold to the Standard Lime & Stone Company. Thereafter, the farm

was leased and used as the Standard Company Farm. Based upon construction techniques and design, the dairy barn, milk house, silo and corn crib probably date to after 1920 when the property was owned by the Standard Lime and Stone Company. From the 1920's until its abandonment in the 1950's, the structures were updated and renovated as technology in the dairy industry changed.

### **Area of Potential Effect**

The area of potential effect (APE) for this project, encompasses the entire wooded area of the Henkle farmstead. All of the structures comprising the farmstead are proposed for removal, leaving only foundations and the cultural landscape intact. Because the structures are in a wooded area, the surrounding viewshed of the Schoolhouse Ridge Battlefield will not be affected.

### **Identification of Historic Properties**

The APE has been surveyed for cultural resources for the Harpers Ferry National Historical Park Historic District. Surveys were conducted as part of the National Register of Historic Places listing (boundary increase 2016) and a cultural landscape inventory. The house and the site are listed as contributing on the National Register. Other contributing elements to the Historic District within or adjacent to the APE include the Schoolhouse Ridge Battlefield and the John Hall Allstadt House Ruins.

### **Consultation and Potential Effects to Historic Properties**

Our analysis of the APE, research of the existing documentation, consultation with regional experts, and evaluation of the project scope leads us to conclude that the proposed project will have An Adverse Effect on historic properties under 36 CFR 800.5. Since the site and the house are contributing structures, mitigations are necessary to lessen the adverse effect. The following are mitigations that the park has placed on this demolition.

- The surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.
- Documentation of the site should include drawings and photographs.
- A Phase I archeological survey will be conducted prior to demolition.
- As much as possible, the foundations of the historic buildings will remain in place. The Park archeologist will monitor the demolition and work with the contractors to ensure the least amount of damage to the landscape. The scope of work for the demolition will specify criteria that excavation is not allowed and that the foundations must be protected. As much as possible, the foundations will be filled in with clean fill to stabilize and secure the site. If, in the process of demolition, a portion of the foundation collapses, the park archeologist will work with the

contractor to ensure that the foundation remnants remain in place and no further collapses occur.

In accordance with the National Environmental Policy Act (NEPA), the NPS has prepared an environmental assessment (EA) that will address this project. The NPS intends to coordinate consultation and NEPA review per Advisory Council on Historic Preservation regulations 36CFR 800.8 and to consult with the public through our Planning, Environment, and Public Comment (PEPC) website.

This letter is accompanied by relevant supporting documentation that identifies the location of the project and additional details of the project. A list of references is also provided. Any of the referenced reports can be provided, upon request, in PDF format. If you have any questions, please feel free to contact Darlene Hassler, Cultural Resources Management Specialist, at 304-535-6188 or [darlene\\_hassler@NPS.gov](mailto:darlene_hassler@NPS.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read "H. Tyrone Brandyburg". The signature is written in a cursive, flowing style.

H. Tyrone Brandyburg  
Superintendent  
Harpers Ferry National Historical Park

#### **Attachments**

Assessment of Effect Form  
Supporting Documentation and Photographs  
Henkle Demolition Environmental Assessment  
Memorandum of Agreement

#### **References**

##### **National Park Service**

2005      *Allstadt Farm Cultural Landscapes Inventory*, United States Department of the Interior, National Park Service, National Capitol Region, Washington, D.C.

##### **National Register of Historic Places**

2016      Harpers Ferry National Historical Park (Boundary Increase), Harpers Ferry, Jefferson/Loudoun Counties, West Virginia/Virginia, National Register #16000238.



IN REPLY REFER TO:

# United States Department of the Interior

NATIONAL PARK SERVICE  
Harpers Ferry National Historical Park  
P.O. Box 65  
Harpers Ferry, West Virginia 25425

1.A.1 (HAFE-H4218)

September 13, 2022

Frank Adams  
Chief  
Upper Mattaponi Indian Tribe  
13476 King William Road  
King William, VA 23086

Subject: Introduction and Section 106 Consultation and Environmental Assessment for Demolition of Historic Structures on the Henkle Property (PEPC 76643), Harpers Ferry National Historical Park, Jefferson County, WV

Chief Adams:

On behalf of the Harpers Ferry National Historical Park (HAFE), I would like to introduce myself to you and to begin the process of establishing a relationship with the Upper Mattaponi Indian Tribe. As the Park superintendent, I manage approximately 3,750 acres of public land located in West Virginia, Maryland and Virginia. The Park is situated at the confluence of the Shenandoah and Potomac Rivers and contains a diverse array of cultural and natural resources. Although the Park is often associated with John Brown's Raid and the Civil War, it also tells stories associated with African American, industrial and transportation history. People have long been drawn to this unique geographical location and the abundance of natural resources.

I am committed to building a government-to-government relationship and consulting with you on Park projects. I also look forward to collaborating with you to better understand the values and significance that indigenous people attribute to the places that are now a part of the Harpers Ferry National Historical Park. The Upper Mattaponi Indian Tribal knowledge and long association with the Chesapeake landscape and Virginia waterways is beneficial to better understanding our history, landscape, and resources. Along with my staff, I am interested in working with you to establish meaningful connections to these places through your stories and your voice. I look forward to the opportunity to consult and collaborate with you on present and future projects and building our relationship. In the near future, I will be reaching out to you to provide a more comprehensive review of Harpers Ferry National Historical Park and to discuss some of the specific areas in which we would like to get your input. To begin our consulting relationship, I have included the Section 106 consultation and Environmental Assessment for an upcoming project involving the demolition of historic structures on Park land.

## **Section 106 Consultation Initiation**

The National Park Service (NPS), Harpers Ferry National Historical Park (HAFE) wishes to initiate consultation with the Upper Mattaponi Indian Tribe under Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) regarding the demolition of five historic structures, in accordance with 36 CFR 800.3 of the regulations of the Advisory Council on Historic Preservation (ACHP). This letter serves to inform the Upper Mattaponi Indian Tribe of HAFE's determination that the proposed undertaking will result in An Adverse Effect to historic properties. The NPS has consulted with the West Virginia State Historic Preservation Office (SHPO) which concurred with the NPS determination and entered into a Memorandum of Agreement to mitigate the effects.

## **Management Summary and Description of Undertaking**

HAFE proposes to demolish five structures associated with the Jacob "Furl" and Susan Allstadt Henkle Farmstead located in a wooded area on the School House Ridge South Battlefield. The five structures include a house, barn, silo, milk house and corncrib. The primary structure is a two-story balloon frame dwelling sheathed in German lap siding. It dates to the early twentieth century and is a typical two-story three-bay frame I-house with a side facing gable roof clad in standing seam metal. A projecting ell is attached to the rear of the house. The other four structures are within close vicinity of the house and are associated with the farmstead. Although it is collapsed, the ruins of the three-story barn still remain in place. The foundation consists of poured concrete, but the framing is made of heavy timbers with mortise-and-tendon joinery. A concrete block silo is attached to the barn and remains intact except for its roof. The milk house is also constructed of concrete blocks with a poured concrete floor. Lastly, the corn crib is constructed of milled lumber and is currently in ruins.

Currently, all five of the structures are in a severe state of disrepair and are considered a health and safety hazard. This demolition project intends to address the health and safety concerns by removing the structural portions of the buildings that pose a risk of fall damage or injury. Essentially, the superstructures will be removed, but as much as possible, the foundations of the historic buildings will remain in place. Furthermore, the surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.

Oral history suggests that the Henkle house was built sometime after 1906 by Jacob "Furl" Henkle. The property was operated as a farm and was part of a larger allotment owned by the Allstadt family including Jacob's mother, Susan Allstadt Henkle. After Susan's death in 1920, the property was sold to the Standard Lime & Stone Company. Thereafter, the farm was leased and used as the Standard Company Farm. Based upon construction techniques and design, the dairy barn, milk house, silo and corn crib probably date to after 1920 when the property was owned by the Standard Lime and Stone Company. From the 1920's until its



abandonment in the 1950's, the structures were updated and renovated as technology in the dairy industry changed.

### **Area of Potential Effect**

The area of potential effect (APE) for this project, encompasses the entire wooded area of the Henkle farmstead. All of the structures comprising the farmstead are proposed for removal, leaving only foundations and the cultural landscape intact. Because the structures are in a wooded area, the surrounding viewshed of the Schoolhouse Ridge Battlefield will not be affected.

### **Identification of Historic Properties**

The APE has been surveyed for cultural resources for the Harpers Ferry National Historical Park Historic District. Surveys were conducted as part of the National Register of Historic Places listing (boundary increase 2016) and a cultural landscape inventory. The house and the site are listed as contributing on the National Register. Other contributing elements to the Historic District within or adjacent to the APE include the Schoolhouse Ridge Battlefield and the John Hall Allstadt House Ruins.

### **Consultation and Potential Effects to Historic Properties**

Our analysis of the APE, research of the existing documentation, consultation with regional experts, and evaluation of the project scope leads us to conclude that the proposed project will have An Adverse Effect on historic properties under 36 CFR 800.5. Since the site and the house are contributing structures, mitigations are necessary to lessen the adverse effect. The following are mitigations that the park has placed on this demolition.

- The surrounding cultural landscape including ornamental trees, shrubs and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not damage any of the foundations or potential archeological remains.
- Documentation of the site should include drawings and photographs.
- A Phase I archeological survey will be conducted prior to demolition.
- As much as possible, the foundations of the historic buildings will remain in place. The Park archeologist will monitor the demolition and work with the contractors to ensure the least amount of damage to the landscape. The scope of work for the demolition will specify criteria that excavation is not allowed and that the foundations must be protected. As much as possible, the foundations will be filled in with clean fill to stabilize and secure the site. If, in the process of demolition, a portion of the foundation collapses, the park archeologist will work with the contractor to ensure that the foundation remnants remain in place and no further collapses occur.

In accordance with the National Environmental Policy Act (NEPA), the NPS has prepared an environmental assessment (EA) that will address this project. The NPS intends to coordinate consultation and NEPA review per Advisory Council on Historic Preservation regulations 36CFR 800.8 and to consult with the public through our Planning, Environment, and Public Comment (PEPC) website.

This letter is accompanied by relevant supporting documentation that identifies the location of the project and additional details of the project. A list of references is also provided. Any of the referenced reports can be provided, upon request, in PDF format. If you have any questions, please feel free to contact Darlene Hassler, Cultural Resources Management Specialist, at 304-535-6188 or [darlene\\_hassler@NPS.gov](mailto:darlene_hassler@NPS.gov).

Sincerely,

H. Tyrone Brandyburg  
Superintendent  
Harpers Ferry National Historical Park

#### **Attachments**

Assessment of Effect Form  
Supporting Documentation and Photographs  
Henkle Demolition Environmental Assessment  
Memorandum of Agreement

#### **References**

National Park Service

2005      *Allstadt Farm Cultural Landscapes Inventory*, United States Department of the Interior, National Park Service, National Capitol Region, Washington, D.C.

National Register of Historic Places

2016      Harpers Ferry National Historical Park (Boundary Increase), Harpers Ferry, Jefferson/Loudoun Counties, West Virginia/Virginia, National Register #16000238.



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
West Virginia Ecological Services Field Office  
6263 Appalachian Highway  
Davis, WV 26260-8061  
Phone: (304) 866-3858 Fax: (304) 866-3852



In Reply Refer To:  
Project code: 2023-0109348  
Project Name: Henkle EA

July 28, 2023

Federal Nexus: yes  
Federal Action Agency (if applicable): Department of Interior

**Subject:** Federal agency coordination under the Endangered Species Act, Section 7 for  
'Henkle EA'

Dear Eric Kelley:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on July 28, 2023, for 'Henkle EA' (here forward, Project). This project has been assigned Project Code 2023-0109348 and all future correspondence should clearly reference this number. **Please carefully review this letter. Your Endangered Species Act (Act) requirements may not be complete.**

### **Ensuring Accurate Determinations When Using IPaC**

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into IPaC must accurately represent the full scope and details of the Project.

Failure to accurately represent or implement the Project as detailed in IPaC or the Northern Long-eared Bat Rangewide Determination Key (DKey), invalidates this letter. ***Answers to certain questions in the DKey commit the project proponent to implementation of conservation measures that must be followed for the ESA determination to remain valid.***

### **Determination for the Northern Long-Eared Bat**

Based upon your IPaC submission and a standing analysis completed by the Service, your project has reached the determination of “May Affect, Not Likely to Adversely Affect” the northern long-eared bat. Unless the Service advises you within 15 days of the date of this letter that your IPaC-assisted determination was incorrect, this letter verifies that consultation on the Action is complete and no further action is necessary unless either of the following occurs:

- new information reveals effects of the action that may affect the northern long-eared bat in a manner or to an extent not previously considered; or,
- the identified action is subsequently modified in a manner that causes an effect to the northern long-eared bat that was not considered when completing the determination key.

### **15-Day Review Period**

As indicated above, the Service will notify you within 15 calendar days if we determine that this proposed Action does not meet the criteria for a “may affect, not likely to adversely affect” (NLAA) determination for the northern long-eared bat. If we do not notify you within that timeframe, you may proceed with the Action under the terms of the NLAA concurrence provided here. This verification period allows the identified Ecological Services Field Office to apply local knowledge to evaluation of the Action, as we may identify a small subset of actions having impacts that we did not anticipate when developing the key. In such cases, the identified Ecological Services Field Office may request additional information to verify the effects determination reached through the Northern Long-eared Bat DKey.

### **Other Species and Critical Habitat that May be Present in the Action Area**

The IPaC-assisted determination for the northern long-eared bat does not apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

- Indiana Bat *Myotis sodalis* Endangered
- Madison Cave Isopod *Antrolana lira* Threatened
- Monarch Butterfly *Danaus plexippus* Candidate
- Tricolored Bat *Perimyotis subflavus* Proposed Endangered

You may coordinate with our Office to determine whether the Action may affect the species and/or critical habitat listed above. Note that reinitiation of consultation would be necessary if a new species is listed or critical habitat designated that may be affected by the identified action before it is complete.

If you have any questions regarding this letter or need further assistance, please contact the West Virginia Ecological Services Field Office and reference Project Code 2023-0109348 associated with this Project.

**Action Description**

You provided to IPaC the following name and description for the subject Action.

**1. Name**

Henkle EA

**2. Description**

The following description was provided for the project 'Henkle EA':

The site is located on the School House Ridge South Battlefield, which is positioned south of Route 340 along Millville Road. This project will contract for the demolition of five farm structures (Henkle house the primary residence, a wood sided two story structure, concrete silo, collapsed wooden dairy barn on a concrete foundation, concrete block milk house and collapsed wooden corn crib) all from the early 20th century. Foundations will remain in place to maintain the historic footprint. The demolition project is expected to last approximately six weeks. All trees, shrubs, vines, need to be removed for access to demo the buildings safely. All vegetation cut will be removed by the contractor. The project will likely occur between October and February.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@39.30451665,-77.78316257606392,14z>



## DETERMINATION KEY RESULT

Based on the answers provided, the proposed Action is consistent with a determination of “may affect, but not likely to adversely affect” for the Endangered northern long-eared bat (*Myotis septentrionalis*).

## QUALIFICATION INTERVIEW

1. Does the proposed project include, or is it reasonably certain to cause, intentional take of the northern long-eared bat or any other listed species?

**Note:** Intentional take is defined as take that is the intended result of a project. Intentional take could refer to research, direct species management, surveys, and/or studies that include intentional handling/encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered or proposed species?

No

2. Do you have post-white nose syndrome occurrence data that indicates that northern long-eared bats (NLEB) are likely to be present in the action area?

Bat occurrence data may include identification of NLEBs in hibernacula, capture of NLEBs, tracking of NLEBs to roost trees, or confirmed acoustic detections. With this question, we are looking for data that, for some reason, may have not yet been made available to U.S. Fish and Wildlife Service.

No

3. Does any component of the action involve construction or operation of wind turbines?

**Note:** For federal actions, answer ‘yes’ if the construction or operation of wind power facilities is either (1) part of the federal action or (2) would not occur but for a federal agency action (federal permit, funding, etc.).

No

4. Is the proposed action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

Yes

5. Is the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), or Federal Transit Administration (FTA) funding or authorizing the proposed action, in whole or in part?

No

6. Are you an employee of the federal action agency or have you been officially designated in writing by the agency as its designated non-federal representative for the purposes of Endangered Species Act Section 7 informal consultation per 50 CFR § 402.08?

**Note:** This key may be used for federal actions and for non-federal actions to facilitate section 7 consultation and to help determine whether an incidental take permit may be needed, respectively. This question is for information purposes only.

*Yes*

7. Is the lead federal action agency the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC)? Is the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC) funding or authorizing the proposed action, in whole or in part?

*No*

8. Is the lead federal action agency the Federal Energy Regulatory Commission (FERC)?

*No*

9. Have you contacted the appropriate agency to determine if your action is near any known northern long-eared bat hibernacula?

**Note:** A document with links to Natural Heritage Inventory databases and other state-specific sources of information on the locations of northern long-eared bat hibernacula is available [here](#). Location information for northern long-eared bat hibernacula is generally kept in state natural heritage inventory databases – the availability of this data varies by state. Many states provide online access to their data, either directly by providing maps or by providing the opportunity to make a data request. In some cases, to protect those resources, access to the information may be limited.

*No*

10. Will the proposed action result in the cutting or other means of knocking down, bringing down, or trimming of any trees suitable for northern long-eared bat roosting?

**Note:** Suitable northern long-eared bat roost trees are live trees and/or snags  $\geq 3$  inches dbh that have exfoliating bark, cracks, crevices, and/or cavities.

*Yes*



## PROJECT QUESTIONNAIRE

Enter the extent of the action area (in acres) from which trees will be removed - round up to the nearest tenth of an acre. For this question, include the entire area where tree removal will take place, even if some live or dead trees will be left standing.

0.5

In what extent of the area (in acres) will trees be cut, knocked down, or trimmed during the inactive (hibernation) season for northern long-eared bat? **Note:** Inactive Season dates for spring staging/fall swarming areas can be found here: <https://www.fws.gov/media/inactive-season-dates-swarming-and-staging-areas>

0.3

In what extent of the area (in acres) will trees be cut, knocked down, or trimmed during the active (non-hibernation) season for northern long-eared bat? **Note:** Inactive Season dates for spring staging/fall swarming areas can be found here: <https://www.fws.gov/media/inactive-season-dates-swarming-and-staging-areas>

0

Will all potential northern long-eared bat (NLEB) roost trees (trees  $\geq 3$  inches diameter at breast height, dbh) be cut, knocked, or brought down from any portion of the action area greater than or equal to 0.1 acre? If all NLEB roost trees will be removed from multiple areas, select 'Yes' if the cumulative extent of those areas meets or exceeds 0.1 acre.

Yes

Enter the extent of the action area (in acres) from which all potential NLEB roost trees will be removed. If all NLEB roost trees will be removed from multiple areas, entire the total extent of those areas. Round up to the nearest tenth of an acre.

0.3

For the area from which all potential northern long-eared bat (NLEB) roost trees will be removed, on how many acres (round to the nearest tenth of an acre) will trees be allowed to regrow? Enter '0' if the entire area from which all potential NLEB roost trees are removed will be developed or otherwise converted to non-forest for the foreseeable future.

0.3

Will any snags (standing dead trees)  $\geq 3$  inches dbh be left standing in the area(s) in which all northern long-eared bat roost trees will be cut, knocked down, or otherwise brought down?

No

Will all project activities be completed by April 1, 2024?

Yes

## **IPAC USER CONTACT INFORMATION**

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## APPENDIX B: NON-IMPAIRMENT DETERMINATION

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), Congress directed the U.S. Department of Interior and the NPS to manage units “to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (54 USC 100101). Congress reiterated this mandate in the Redwood National Park Expansion Act of 1978 by stating that NPS must conduct its actions in a manner that will ensure no “derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress” (54 USC 100101).

The NPS has discretion to allow impacts on Park resources and values when necessary and appropriate to fulfill the purposes of a Park (NPS 2006, Section 1.4.3). However, the NPS cannot allow an adverse impact that will constitute an impairment of the affected resources and value (NPS 2006, Section 1.4.3). An action constitutes an impairment when its impacts “harm the integrity of Park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values” (NPS 2006, Section 1.4.5). To determine impairment, the NPS must evaluate “the particular resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts” (NPS 2006, Section 1.4.5). This 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.

This determination on impairment has been prepared for the selected alternative described in this Finding of No Significant Impact. An impairment determination is made for the resource topic Historic Structures, Districts, Cultural Landscape and Archeology. An impairment determination is not made for Visitor Use and Experience 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.

**Historic Structures, Districts, Cultural Landscape and Archeology** - The demolition of these buildings will result in an adverse effect to the historic resources. To minimize this adverse effect the foundations of the structures and surrounding landscape, including ornamental trees, shrubs, and flowers along with the topography will be preserved as much as feasible. The site will remain as a wooded area so that farming practices do not disturb or damage any of the foundations or potential archeological remains. Interpretation of the site will occur both for Henkle Farm House property and the 1862 Battle of Harpers Ferry landscape. In addition, implementation of the Selected Alternative will fulfill portions of the 2010 Harpers Ferry National Historical Park General Management Plan/Environmental Impact Statement that calls for the Schoolhouse Ridge area of the Park to be managed as battlefield landscape to maintain the 1862 appearance. Demolition of the Henkle Farm House Site by removing the structures further accomplishes that management goal by modifying the landscape to more closely resemble the Battle of Harpers Ferry landscape. Overall, the selected alternative will not diminish the integrity of the Park’s cultural resources, therefore, there will be no impairment.

### CONCLUSION

The NPS has determined that the implementation of the NPS selected alternative will not constitute an impairment of the resources or values of the Harpers Ferry National Historical Park. As described above, implementing the selected alternative is not anticipated to impair resources or values that are essential to the purposes identified in the establishing legislation of the park, key to the natural or cultural integrity of the park, or identified as significant in the park’s relevant planning documents. This conclusion is based on consideration of the park’s purpose and significance, a thorough analysis of the environmental impacts described in the EA, the comments provided by the public and others, and the professional judgment of the decision-maker guided by the direction of the NPS Management Policies 2006.