



FINDING OF NO SIGNIFICANT IMPACT

CLARA BARTON PARKWAY CANTILEVER AND GLEN ECHO OVERPASS

GEORGE WASHINGTON MEMORIAL PARKWAY

Maryland

The National Park Service (NPS) prepared an Environmental Assessment (EA) to evaluate the impacts that will result from implementing the Clara Barton Parkway Cantilever and Glen Echo Overpass Project (the Project)¹. The Project will replace the cantilever structure and reconstruct the adjacent retaining walls on Clara Barton Parkway between Cabin John Parkway and the Macarthur Boulevard exit ramp in Montgomery County, Maryland. The Project will also demolish the Glen Echo Overpass. The statements and conclusions reached in this Finding of No Significant Impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference.

The NPS last rehabilitated the cantilever structure and associated retaining walls in 1992 and performed spot repairs in 2020. The Federal Highway Administration (FHWA) conducted an in-depth special study of the concrete cantilever structure in 2020 that indicated the cantilever structure is exhibiting widespread deterioration. The FHWA estimated the useful remaining service life of the structure was approximately five years from completion of the study. In 2023, a comprehensive study conducted on the adjacent retaining walls revealed they are also nearing the end of their useful service life. The FHWA has recommended action be taken since subsequent inspections have confirmed the timelines of the estimated remaining service lives of the structures. Otherwise, widespread corrosion of the steel and deterioration of the concrete will reduce the load-bearing capacity of the cantilever structure and severely impact its structural integrity. The NPS will be required to implement weight restrictions on the westbound cantilevered lane of Clara Barton Parkway due to its reduced load-bearing capacity if action is not taken. Shortly thereafter, lane closures will be necessary for public safety on the westbound cantilevered lane and on the eastbound lane below the cantilever structure, which is at risk from falling concrete debris. This would cause substantial traffic impacts, as approximately 40,000 people use the Clara Barton Parkway daily, making it an essential thoroughfare in the area.

¹ The Department of the Interior (DOI) published an interim final rule, NEPA Implementing Regulations, on July 3, 2025, “rescinding and making necessary targeted updates to its remaining regulations implementing” NEPA. 90 Fed. Reg. 29498 (July 3, 2025), as well as a DOI NEPA Handbook at 516 Departmental Manual 1. The park published a EA on September 9, 2025, relying upon preexisting NEPA procedures that predate July 3, 2025, because the plan’s NEPA review was sufficiently advanced at the time DOI issued the NEPA rule. Nonetheless, NPS will rely upon existing procedures to issue this FONSI, completing the NEPA review for the plan. The EA and FONSI are consistent with DOI’s July 3, 2025, NEPA Implementing Regulations and DOI NEPA Handbook.

The Project also includes demolition of the Glen Echo Overpass because the FHWA conducted a routine inspection of the bridge in 2023 that identified issues with bridge safety railings, accumulation of debris that is inhibiting proper drainage, encroaching tree growth, concrete spalling with exposed rebar, loose rock adjacent to pier columns, and erosion of the embankment in front of the south abutment and south pier columns. The FHWA recommended corrective actions, and as such, the NPS is proposing demolition because the bridge is likely to require eventual rehabilitation if left in place. Demolishing the bridge at the same time as the cantilever structure construction will be more cost-effective than a separate project, meanwhile also consolidating the construction-related traffic impacts on visitors and daily commuters.

PUBLIC AND AGENCY INVOLVEMENT

Public Scoping – As part of the National Environmental Policy Act (NEPA) process and to comply with the requirements of Section 106 of the National Historic Preservation Act (NHPA), the NPS involved the public in project planning by conducting public scoping from March 17 to April 16, 2025. The NPS held an agency scoping meeting on March 17, 2025, at the start of the scoping period, as well as a virtual public meeting during the evening of March 19, 2025, using the GoToWebinar platform. The NPS announced the public scoping period and meetings on March 10, 2025, by distributing a news release by electronic notice to the George Washington Memorial Parkway’s (Park) maintained email distribution list. The notice was also posted in the “News Releases” section of the official Park website [[News - George Washington Memorial Parkway \(nps.gov\)](#)]. An agency scoping notification letter was sent to a list of locally elected officials, agency and tribal representatives, and other potential stakeholders. The news release and agency letter included a link to the NPS Planning, Environment and Public Comment (PEPC) project webpage [[Clara Barton Parkway Cantilever \(nps.gov\)](#)] where a public scoping notification letter from the Superintendent was posted. The presentation used during the virtual public meeting and the scoping letter remain available to view at the PEPC project webpage [[Clara Barton Parkway Cantilever \(nps.gov\)](#)].

EA Public Review – The EA was made available for public review from September 9 to October 9, 2025, at the PEPC project webpage [[Clara Barton Parkway Cantilever \(nps.gov\)](#)]. The EA public review period was announced on the PEPC project webpage and by news release and email blast. A total of 22 separate correspondences were received during the EA public review period. Responses to substantive public comments are provided in **Attachment C**.

National Historic Preservation Act, Section 106 Consultation – Pursuant to Section 106 of the NHPA and its implementing regulations (36 CFR Part 800) “Protection of Historic Properties,” the NPS initiated consultation with Maryland Historical Trust (MHT) in a letter dated December 18, 2024. The letter described the Project, defined a draft Area of Potential Effect (APE), and identified known historic properties within the APE. The MHT acknowledged receipt of the initiation letter on January 14, 2025, and concurred with the defined APE and the list of identified known historic properties within the APE. All consultation correspondence is provided in **Attachment E**.

The NPS continued Section 106 consultation by sending a letter on February 26, 2025, notifying the MHT of an anticipated adverse effect finding on Clara Barton Parkway. Although an adverse effect was anticipated, the NPS committed to preparing an Assessment of Effects to describe the potential effects of the alternatives and modifications developed for the Project on the historic properties within the APE and to introduce potential mitigation measures to resolve adverse effects for continued consultation with MHT. The MHT responded on April 2, 2025, agreeing that an adverse effect is likely and that they await the NPS’ finding of effect. The NPS prepared the Assessment of Effects after public scoping concluded, and a Preferred Alternative was identified. The Assessment of Effects, which found there would be an adverse effect on Clara Barton Parkway, was submitted to the MHT and consulting parties and was made available for public review at the PEPC project webpage [[Clara Barton Parkway Cantilever \(nps.gov\)](#)] from June 6, 2025, to July 7, 2025. The MHT concurred with the NPS’ adverse effect finding on July 1, 2025. The NPS notified the Advisory Council on Historic Preservation (ACHP) of the adverse effect on

July 9, 2025, and invited ACHP to participate in consultation to resolve the adverse effect. ACHP declined to participate in a response received on July 16, 2025.

The NPS and MHT have developed a Memorandum of Agreement (MOA) that provides the mechanism to resolve the adverse effects of the Undertaking and complete the requirements of Section 106 of the NHPA (54 USC 306108) and its implementing regulations (36 CFR Part 800). The MOA defines the agreed upon avoidance, minimization, and mitigation measures to resolve adverse effects on the Clara Barton Parkway and to prevent adverse effects to the Spanish Ballroom at Glen Echo Park. The final, fully executed MOA is included as **Attachment D**.

Tribal Consultation –The NPS also sent letters to initiate government-to-government consultation with the following federally recognized American Indian tribes: the Catawba Indian Nation, Chickahominy Indian Tribe, Chickahominy Tribe Eastern Division, Delaware Nation, Eastern Shawnee Tribe of Oklahoma, Monacan Indian Nation, Nansemond Indian Nation, Pamunkey Indian Tribe, Rappahannock Tribe, Seneca Cayuga Nation, Shawnee Tribe, and the Upper Mattaponi Indian Tribe. The Chickahominy Tribe Eastern Division and Shawnee Tribe responded on December 30, 2024, and on February 11, 2025, respectively, that the Project is outside their area of interest. The Tribal Historic Preservation Office for the Catawba Indian Nation responded on January 21, 2025, requesting to be notified if any Native American artifacts and/or human remains are discovered within the APE. Responses have not been received from the other tribes as of the preparation of this FONSI. Tribal consultation correspondence is provided in **Attachment E**.

Endangered Species Act, Section 7 Consultation – The NPS obtained an official species list from the US Fish and Wildlife Service (USFWS) in accordance with Section 7 of the Endangered Species Act that identified the federally listed endangered northern long-eared bat (*Myotis septentrionalis*), the proposed endangered tricolored bat (*Perimyotis subflavus*), and the proposed threatened monarch butterfly (*Danaus plexippus*), as potentially occurring in the Project area. The official species listed can be found in **Attachment E**. NPS will conduct informal Section 7 consultation with USFWS as project designs are progressed, including if the Project changes from what has been initially described in the EA, as well as when the status of a species changes or there is designation of critical habitat for a species prior to construction. NPS will work with USFWS through the consultation process to identify conservation measures, such as restricting tree clearing during the bat's active period between April 1 and November 15, to reduce any impacts to threatened and endangered species that arise from the Project.

Additionally, the Maryland Department of Natural Resources (MD DNR) Wildlife and Heritage Service stated that it has no official records for state- or federally listed, candidate, proposed, or rare plant or animal species within the Project area in a letter dated March 24, 2025. As a result, MD DNR had no specific concerns regarding potential impacts to such species or recommendations for protection measures. The MD DNR letter can be found in **Attachment E**.

ALTERNATIVES CONSIDERED AND SELECTED

The NPS analyzed the No Action Alternative and the proposed Clara Barton Parkway Cantilever and Glen Echo Overpass Project (the Proposed Action and Selected Alternative) in the EA. A detailed description of the alternatives can be found on pages 7-9 of the EA. The No Action Alternative was carried forward to provide a comparative baseline against which to analyze the effects of the Proposed Action (40 CFR Part 1502.14). Based on the analysis presented in the EA, the NPS selected the Proposed Action for implementation.

Cantilever Structure and Retaining Walls – The Selected Alternative will replace the existing 1,409-foot cantilever structure on Clara Barton Parkway. The replacement includes removing the existing cantilevered slab while keeping the existing retaining wall and footing in place to hold back soil during construction. The NPS will install a new retaining wall adjacent to the existing structure using soil anchors and reinforcing steel posts called micropiles after removing the existing cantilever structure.

Using this method, the new retaining wall will bear the load of the structure entirely, relieving the old wall of any structural burden. Afterward, the NPS will excavate up to 12 feet into the hillside adjacent to the westbound lanes of Clara Barton Parkway. The NPS will then install a cantilevered concrete slab on a new alignment that shifts the westbound lanes north into the excavated hillside. The alignment shift will result in an overhang approximately six feet narrower than the existing structure at its widest section. The remaining excavated area would be used to establish a drainage ditch and rock fall area for traffic safety. The NPS will then install rock bolts into the hillside to stabilize the newly exposed bedrock. The NPS will also install new safety railings that meet current safety hardware standards and mountable curbs, and roadway signage will be replaced or reinstalled, as needed, to complete the cantilever structure replacement.

The NPS proposes to reconstruct 2,048 feet of concrete retaining walls along Clara Barton Parkway associated with the cantilever structure, including 1,824 feet of wall north of the structure, and 224 feet of wall to the south of the structure. The NPS will use a similar approach to the cantilever structure that will involve constructing the new retaining walls adjacent to the existing walls. The NPS will also install new safety railings on the retaining walls that meet current safety hardware standards.

Glen Echo Overpass – The Selected Alternative also includes demolishing the unused Glen Echo Overpass. Demolition will first involve placing a protective material on top of the asphalt road surface underneath the overpass to prevent damage during bridge demolition. Then, excavators will remove the bridge deck and overhangs, girders/piers, and abutments by demolishing the concrete structure into smaller pieces to be transported offsite for proper disposal. Minimal site restoration will be necessary after the bridge is removed since it is anchored into exposed bedrock with limited opportunities to install trees and shrubs at the location.

RATIONALE FOR DECISION

The NPS identified the Clara Barton Parkway Cantilever and Glen Echo Overpass Project as the Selected Alternative because it meets the project purpose and need by addressing the structural deterioration while resulting in minimal environmental impacts. The No Action Alternative does not satisfy the need for the project because the structures will continue to deteriorate, requiring frequent maintenance, and eventual indefinite lane closures if no action is taken.

ALTERNATIVES DISMISSED FROM FURTHER CONSIDERATION

The NPS considered a range of alternatives for the proposed Project that were ultimately dismissed from further consideration as described in Appendix A of the EA. The NPS considered one rehabilitation alternative and several replacement alternatives for the cantilever structure during initial project planning. All the dismissed replacement alternatives are slightly modified versions of the Selected Alternative, or variations of an in-kind replacement alternative. Rehabilitation was dismissed from further consideration because it would only extend the useable lifespan of the structure by approximately 25 years, at which time a complete replacement would be required. Therefore, rehabilitation would have the highest life cycle cost and would require frequent maintenance. The in-kind replacement alternatives were dismissed because they would have an anticipated construction duration approximately 180 days longer and cost approximately \$24 million dollars more to construct as compared to the Selected Alternative. Additionally, the in-kind replacement alternative would allow for only one travel lane to be maintained during construction that would alternate directions to accommodate peak traffic, while the Selected Alternative will allow for two travel lanes to remain open to traffic for most of construction.

The NPS also considered rehabilitation of the Glen Echo Overpass for various purposes as described in Appendix A of the EA. However, rehabilitation of the overpass was dismissed from further consideration given the cumulative challenges that do not make it practical or reasonable to pursue, such as substantial grade differences, environmental and topographical constraints, the need for significant new

infrastructure, and the absence of funding. Noise walls were also not further considered since they are not within the scope of the current proposal.

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 implement mitigation measures to avoid and/or minimize impacts. Proposed mitigation measures of the Selected Alternative are provided in **Attachment A**. These mitigation measures will allow the NPS to meet its conservation mandates as required by the NPS Organic Act (16 USC 1 *et seq.*) and minimize disruption for park visitors and neighbors. Exact mitigation measures to be implemented will depend upon the final design and plan review/approval by NPS and the National Capital Planning Commission (NCPC), as appropriate.

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT IMPACT

As documented in the EA, the Selected Alternative will have adverse impacts on visitor and community use and experience, including traffic (see EA pages 13-18); historic structures and districts (see EA pages 19-22); and the Clara Barton Parkway Cultural Landscape (see EA pages 22-26). Anticipated impacts that will occur are summarized below by resource.

Visitor and Community Use and Experience, including Traffic – The NPS anticipates substantial traffic impacts on Clara Barton Parkway from lane closures required to complete construction. However, these closures will be temporary, unlike the no action alternative, which will require indefinite lane closures if structural deterioration of the cantilever structure is allowed to continue. The design-build (D-B) contractor will prepare Maintenance of Traffic (MOT) Plans coordinated with the appropriate agencies and local stakeholders to minimize delays as much as possible. Additionally, construction-related noise may be disruptive to visitors and events to Glen Echo Park, as well as nearby residents; however, the NPS will ensure the D-B contractor adheres to the Montgomery County Noise Control Ordinance and noise monitoring and resource protection program as described on page 18 of the EA and further detailed in the MOA in **Attachment D**. Traffic and noise are expected to return to pre-construction conditions once the Project has been completed.

Historic Structures, Districts, and the Clara Barton Parkway Cultural Landscape – The APE for the Selected Alternative includes multiple historic structures and districts listed in the National Register of Historic Places (NRHP), as well as the NPS-designated Clara Barton Parkway Cultural Landscape. The Selected Alternative will have an adverse effect on the NRHP-listed George Washington Memorial Parkway/Clara Barton Parkway (M: 35-61) and associated cultural landscape from replacement of the original cantilever structure and retaining walls, the addition of new retaining walls that will obscure views of the current walls, realignment of the roadway, excavation into the hillside and the associated removal of trees and exposure of bedrock, and removal of the Glen Echo Overpass. No adverse effects are expected on the other historic properties within the APE.

The NPS and MHT have developed and executed an MOA in accordance with 36 CFR 800.6(c) that describes the avoidance, minimization, and mitigation measures agreed upon by both agencies to resolve the adverse effects on Clara Barton Parkway, which include preparing Level II HAER documentation for both the cantilever structure and Glen Echo Overpass, vibration and noise monitoring and resource protection, and public interpretation signage, as described on pages 18 and 21 of the EA and further detailed in the MOA in **Attachment D**.

CONCLUSION

This finding is based on consideration of the criteria for significance, the potentially affected environment and degree of effects of the impacts described in the EA (which is hereby incorporated by reference), and as summarized above.

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

Recommended: JENNIFER MADELLO Digitally signed by JENNIFER MADELLO
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Jennifer Madello
Superintendent
George Washington Memorial Parkway
National Capital Region

Date

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Date

- Attachment A: Mitigation Measures
- Attachment B: Non-Impairment Determination
- Attachment C: Concern Statements and Responses
- Attachment D: Section 106 Memorandum of Agreement
- Attachment E: Agency Consultation Correspondence

ATTACHMENT A: MITIGATION MEASURES

Visitor and Community Use and Experience, including Traffic

- Implement detailed MOT Plans that reduce temporary construction-related traffic impacts on Clara Barton Parkway, MacArthur Boulevard, and other roadways.
- Coordinate MOT with the MDOT –SHA, MCDOT, the town of Glen Echo, and other stakeholders, as applicable.
- Provide advance notice of construction schedule or traffic patterns changes, as well as recommendations for alternative routes to avoid delays on Clara Barton Parkway.
- Adhere to Montgomery County’s Noise Control Ordinance at Chapter 31B of the County Code, including preparing a Noise Suppression Plan.
- Implement a noise monitoring and resource protection program to minimize noise disturbance at Glen Echo Park and surrounding areas, including baseline and real-time construction noise monitoring; and coordinating construction schedules with community event calendars; and stakeholder and community coordination and engagement before and during construction.

Historic Structures, Districts, and the Clara Barton Parkway Cultural Landscape

- Execute an MOA in accordance with 36 CFR 800.6(c) that details the avoidance, minimization, and mitigation measures agreed upon by NPS and MHT to resolve the adverse effects on Clara Barton Parkway.
- Prepare Level II HAER documentation for both the cantilever structure and Glen Echo Overpass.
- Implement a vibration monitoring and resource protection program to minimize vibration spikes that could impact the Spanish Ballroom.
- Implement a noise monitoring and resource protection program to minimize noise disturbance at Glen Echo Park and surrounding areas.
- Install interpretive signage to educate the public on the historical significance of the Clara Barton Parkway, highlighting the original cantilever structure and Glen Echo Overpass, the need for their modification or removal, and the parkway’s role in the GWMP cultural landscape and mid-20th-century parkway planning.
- Replace trees that cannot be avoided in accordance with NCPC’s Tree Preservation and Replacement Policy at locations that reflect the native plant communities and the cultural landscape character of the Parkway.

ATTACHMENT B: NON-IMPAIRMENT DETERMINATION

By enacting the NPS Organic Act of 1916, Congress directed the US 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 sec. 1.4.3). However, the NPS cannot allow an adverse impact that would constitute impairment of the affected resources and values (NPS 2006 sec 1.4.3). An action constitutes an impairment when its impacts “harm the integrity of Park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values” (NPS 2006 sec 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 non-impairment has been prepared for the Selected Alternative described in the FONSI. An impairment determination is made for historic structures, districts, and the Clara Barton Parkway Cultural Landscape. An impairment determination has not been made for visitor and community use and experience, including traffic 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 NPS Organic Act of 1916 and cannot be impaired in the same way that an action can impair park resources and values.

Historic Structures, Districts, and the Clara Barton Parkway Cultural Landscape – The Selected Alternative will have an adverse effect on the NRHP-listed George Washington Memorial Parkway/Clara Barton Parkway (M: 35-61) and associated cultural landscape from replacement of the original cantilever structure and retaining walls, the addition of new retaining walls that will obscure views of the current walls, realignment of the roadway, excavation into the hillside and the associated removal of trees and exposure of bedrock, and removal of the Glen Echo Overpass. No adverse effects are expected on the other historic properties within the APE.

The NPS and MHT have developed and executed an MOA in accordance with 36 CFR 800.6(c) that describes the avoidance, minimization, and mitigation measures agreed upon by both agencies to resolve the adverse effects on Clara Barton Parkway, which include preparing Level II HAER documentation for both the cantilever structure and Glen Echo Overpass, vibration and noise monitoring and resource protection, and public interpretation signage, as described on pages 18 and 21 of the EA and further detailed in the MOA in **Attachment D**.

Although the Selected Alternative will have an adverse effect on the NRHP-listed Clara Barton Parkway and associated cultural landscape, implementation of avoidance, minimization, and mitigation measures are expected to resolve the adverse effect. Therefore, Clara Barton Parkway will not be impaired by the Selected Alternative. Furthermore, implementation of the Selected Alternative will address structural deterioration to ensure Clara Barton Parkway remains available to be used and enjoyed by current and future generations.

CONCLUSION

The NPS has determined that the implementation of the Selected Alternative will not constitute an impairment of the resources or values of 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.

ATTACHMENT C: CONCERN STATEMENTS AND RESPONSES

This report groups substantive comments into concern statements and provides NPS's responses. Substantive comments are those that are: question, with reasonable basis, the accuracy of the information in the NEPA document; question, with reasonable basis, the adequacy of the environmental analysis; present reasonable alternatives other than those presented in the NEPA document; or cause changes or revisions in the proposal. Comments that merely support or oppose a proposal or that merely agree or disagree with NPS policy are not considered substantive. Comments did not receive responses if they were determined not substantive.

The Clara Barton Parkway Cantilever and Glen Echo Overpass EA was made available for public review from September 9 to October 9, 2025, at the NPS Planning, Environment and Public Comment (PEPC) project webpage [[Clara Barton Parkway Cantilever \(nps.gov\)](https://www.nps.gov/clara-barton-parkway-cantilever)]. The EA public review period was announced on the PEPC project webpage and by news release and email blast. A total of 22 separate correspondences were received during the EA public review period within which 22 comments were reviewed and analyzed. A total of 21 comments considered substantive were grouped into concern statements of related topic areas and NPS provides responses to those concerns in **Table C-1**.

Table C-1. Concern Statements and Responses

CONCERN STATEMENT	RESPONSE
Noise Impacts from Proximity of the Parkway	
<p>Query: The project proposes moving the parkway up to 12 feet closer to Glen Echo residences, potentially increasing traffic noise. How will noise impacts be assessed and mitigated for residents, particularly after construction is completed?</p> <p>Proposal: Consider noise abatement measures, including vegetation buffers, quieter pavement, or speed reductions through this section. (Corr: 2, 4, 7, 10, 17, 22)</p>	<p>The Project will generate temporary construction noise, particularly near Glen Echo residents and the Spanish Ballroom at Glen Echo Park. Construction activities include concrete demolition, excavation, vegetation clearing, and rock bolt installation. Noise will be minimized through a Noise Suppression Plan, adherence to Montgomery County Noise Control Ordinance (Chapter 31B of the County Code) and real-time monitoring. Once construction is complete, noise levels are expected to return to pre-construction conditions. (MOA Stipulation I.C.1 & 2)</p> <p>EA Reference: Chapter 3, Visitor and Community Use and Experience, Including Traffic, “Noise” section, pp. 18</p>
Vibration and Hillside Stability	
<p>Query: Excavation, rock bolt installation, and demolition may create vibrations affecting hillside stability and foundations of homes in Glen Echo. How will these risks be monitored and mitigated for private properties?</p> <p>Proposal: Implement a comprehensive vibration monitoring and management plan for all affected properties, similar to the plan for the Spanish Ballroom. (Corr: 5, 6, 7, 12, 16, 19, 20, 22)</p>	<p>The project acknowledges that excavation, rock-bolt installation, and demolition activities can generate vibration that may be felt at adjacent properties, including the Spanish Ballroom. To minimize risks to hillside stability and private foundations, the project will implement a comprehensive vibration monitoring and management plan. This plan will establish baseline vibration levels, set construction thresholds, and use real-time sensors along the project corridor. Construction methods will be adjusted if thresholds are approached to avoid structural impacts or slope instability. Geotechnical engineers will monitor performance throughout excavation and stabilization work. (MOA Stipulation I.B.)</p> <p>EA Reference: Chapter 3, Historic Structures and Districts, “Glen Echo Park Historic District,” pp. 21</p>

Encroachment Beyond Existing Parkway Footprint	
<p>Query: The project proposes excavation that moves the parkway closer to Glen Echo properties. Can the project remain within its current footprint to minimize adverse impacts?</p>	<p>The preferred alternative narrows the cantilever footprint to meet structural and safety requirements while minimizing impacts on historic and environmental resources. Because the existing corridor is tightly constrained by the steep hillside and the historic Glen Echo Park bridge, the project must fit two 11-foot lanes and required safety elements within the smallest possible structural envelope. Widening the cantilever or expanding the roadway footprint would require additional excavation into the hillside and could alter or damage contributing features of both the historic bridge and the Clara Barton Parkway cultural landscape. By reducing the width of the cantilever to the minimum necessary for safe operations, the preferred alternative avoids more extensive disturbance, limits effects on vegetation and topography, and better preserves the Parkway’s historic character.</p>
<p>Proposal: Maintain current WB footprint, consider shifting EB lanes onto the C&O Canal corridor or implementing a double-decker cantilever to avoid encroachment. (Corr: 5, 6, 7, 8, 10, 12, 20, 22)</p>	<p>EA Reference: Chapter 1, Purpose and Need, Chapter 2 Alternatives, Chapter 3 Historic Structure and Cultural Landscape</p>
Tree Removal and Visual/Acoustic Buffers	
<p>Query: The project calls for tree removal along the cantilever and hillside. How many trees will be removed, and what measures will be taken to preserve visual and acoustic buffering for Glen Echo residents?</p>	<p>A detailed tree inventory will be completed during the EA to quantify tree removal associated with the cantilever replacement, stabilization work, and adjacent excavation. The project goal is to minimize tree removal wherever feasible. Trees will be replaced in accordance with the National Capital Planning Commission’s Tree Preservation and Replacement Policy. Tree replacement activities will be communicated as part of community stakeholder engagement during design and construction.</p>
<p>Proposal: Minimize tree removal and prioritize preserving trees opposite private residences. (Corr: 2, 18)</p>	<p>EA Reference: Chapter 1, Purpose and Need, p.5</p>
Stormwater and Utility Coordination	
<p>Query: How will the project affect stormwater flow and existing utilities, including WSSC sewer lines along the parkway?</p>	<p>The NPS would prepare an Erosion and Sediment Control (ESC) Plan and a Stormwater Management (SWM) Plan for review and approval from the Maryland Department of the Environment (MDE). The ESC and SWM Plans would incorporate selected principles and practices into construction in accordance with Maryland’s 2011 Standards and Specifications for Soil Erosion and Sediment Control, the publication entitled Maryland</p>

<p>Proposal: Coordinate stormwater management with Town systems to prevent flooding or utility disruption. (Corr: 4, 9, 15)</p>	<p>Stormwater Management and Erosion and Sediment Control Guidelines for State and Federal Projects dated February 2015, and Technical Memorandum #10: Stormwater Management Overview for State and Federal Projects dated July 18, 2018.</p> <p>EA Reference: Chapter 3, Visitor and Community Use and Experience, Including Traffic, pp. 13–15</p>
<p>Pedestrian and Towpath Access</p>	
<p>Query: The EA does not currently include a pedestrian/bicycle overpass connecting Glen Echo Park to the C&O Canal towpath. Can this project provide improved public access?</p>	<p>A new overpass between Glen Echo Park and the C&O Canal towpath is outside the scope of this environmental assessment. The Glen Echo Overpass cannot be practically reused as a bike or pedestrian connection due to steep elevation differences requiring long ramps or switchbacks, dense vegetation and utilities obstructing access, and the need for extensive structural repairs and new construction to meet safety and accessibility standards. Nearby alternative routes already provide feasible pedestrian and bicycle access with fewer obstacles. Combined with high costs, ongoing maintenance needs, and limited scenic or functional benefit, these challenges make rehabilitation for bike/ped use impractical.</p>
<p>Proposal: Construct a pedestrian overpass from Glen Echo Park parking lot to the towpath to restore historic connectivity. (Corr: 13, 14, 19)</p>	<p>EA Reference: Appendix A, pp.A4-A6</p>
<p>Traffic Safety and Speed Enforcement</p>	
<p>Query: High vehicle speeds on Clara Barton Parkway create noise and safety hazards. Will the project address speeding and implement traffic-calming measures?</p>	<p>Electronic speed management tools are not explicitly part of the cantilever replacement project. Lane closures will be required during construction and will follow best practices for safety in a work zone.</p>
<p>Proposal: Consider speed cameras, electronic speed signage, weekend partial closures, and other enforcement mechanisms to improve safety. (Corr: 2, 14)</p>	

Construction Duration and Communication	
<p>Query: How long will construction take, and how will residents be informed of impacts including noise, traffic, and access?</p>	<p>Construction duration will depend on final design, sequencing, and safety requirements; detailed schedules will be shared with residents once the design is advanced. Throughout construction, the project team will maintain clear and consistent communication regarding work hours, noise-generating activities, traffic changes, access restrictions, and any temporary impacts on Glen Echo Park or neighboring residences.</p>
<p>Proposal: Provide clear timelines, public communication, and mitigation measures for construction-related disruptions. (Corr: 11, 14, 17)</p>	<p>Public outreach will include periodic construction updates, advance notice of disruptive activities, and opportunities for residents to raise concerns. Mitigation measures for construction noise, vibration, access, and traffic will be incorporated into the contractor's management plans and included in public communications.</p>

ATTACHMENT D: SECTION 106 MEMORANDUM OF AGREEMENT

**MEMORANDUM OF AGREEMENT
BETWEEN THE
NATIONAL PARK SERVICE
AND THE
MARYLAND STATE HISTORIC PRESERVATION OFFICE
REGARDING THE
CLARA BARTON PARKWAY CANTILEVER AND GLEN ECHO OVERPASS**

WHEREAS, George Washington Memorial Parkway, an administrative unit of the National Park Service (hereinafter NPS), proposes to replace the Clara Barton Parkway cantilever structure, reconstruct the adjacent retaining walls, and demolish the Glen Echo Overpass in Montgomery County, Maryland, and this action constitutes an Undertaking as defined by 36 CFR § 800.16(y), thereby requiring review under Section 106 of the National Historic Preservation Act of 1966 (NHPA) (54 USC § 306108) as implemented in 36 CFR § Part 800; and

WHEREAS, the NPS initiated Section 106 consultation on the Clara Barton Parkway Cantilever and Glen Echo Overpass Project (hereinafter the Project) with the Maryland State Historic Preservation Office (hereinafter MD SHPO) by letter dated December 18, 2024; and

WHEREAS, the NPS also sent letters to initiate government-to-government consultation with the following federally recognized American Indian tribes consistent with 36 CFR § 800.2(c)(2): Absentee Shawnee Tribe of Oklahoma, Catawba Indian Nation, Chickahominy Indian Tribe, Chickahominy Tribe Eastern Division, Delaware Nation, Eastern Shawnee Tribe of Oklahoma, Monacan Indian Nation, Nansmond Indian Nation, Pamunkey Indian Tribe, Rappahannock Tribe, Seneca Cayuga Nation, Shawnee Tribe, and Upper Mattaponi Indian Tribe; and

WHEREAS, the Chickahominy Tribe Eastern Division and the Shawnee Tribe responded on December 30, 2024, and February 11, 2025, respectively, that the Project is outside their area of interest. The Tribal Historic Preservation Office for the Catawba Indian Nation responded on January 21, 2025, requesting to be notified if any Native American artifacts and/or human remains are discovered within the APE. Responses have not been received from the other tribes as of the preparation of this Agreement; and

WHEREAS, NPS has also invited the following parties to consult regarding the effects of the Undertaking on historic properties: National Capital Planning Commission; NPS, C&O Canal National Historical Park; US Environmental Protection Agency; US Fish and Wildlife Service; US Naval Surface Warfare Center, Carderock Division; Maryland Department of Transportation, State Highway Administration; Maryland Department of Natural Resources; C&O Canal Trust; C&O Canal Association; National Parks Conservation Association; Sierra Club, Montgomery County Group; Montgomery Planning, Historic Preservation Office; Montgomery County Department of Transportation; Montgomery County Executive & Council; Montgomery County Civic Federation; Heritage Montgomery; Montgomery History; Montgomery Preservation; Preservation Maryland; Town of Glen Echo; Glen Echo Park Partnership for Arts & Culture; Cabin John Citizens Association; Carderock Springs Citizens Association; Tulip Hill Citizens Association; Glen Echo Heights Citizens Association; Bannockburn Civic Association; Montgomery Park Citizens Association Section 1; Kenwood Park Community Association; Bethesda/Chevy Chase Regional Services Office; Accohannock Indian Tribe; Piscataway Conoy; Piscataway Indian Tribe; and

WHEREAS, the NPS has defined the Area of Potential Effect (hereinafter APE) as defined by 36 CFR § 800.16(d) to include the Clara Barton Parkway, the Glen Echo Overpass, and adjacent historic properties (**Attachment A: APE Map**); and

WHEREAS, the MD SHPO concurred with the APE in a response sent through Maryland Historical Trust's e106 online system on January 14, 2025, as well as with the following historic properties listed, or eligible for listing, in the National Register of Historic Places (hereinafter National Register) within the APE: George

Washington Memorial Parkway/Clara Barton Parkway (M: 35-61), Clara Barton National Historic Site (M: 35-25), Glen Echo Park Historic District (M: 35-41), the Carousel (M: 35-39) and Chautauqua Tower (M: 35-26) at Glen Echo Park, C&O Canal National Historical Park (M: 12-46), and the C&O Canal Lock #7 and Lock Keeper's House (M: 35-27) (Attachment A: APE Map); and

WHEREAS, the NPS notified the MD SHPO by letter dated February 28, 2025, of the anticipated adverse effects on Clara Barton Parkway from the cantilever replacement and overpass removal; and

WHEREAS, the NPS prepared an Assessment of Effects Report to evaluate the potential for adverse effects on the historic properties within the APE that was submitted to MD SHPO and consulting parties on June 6, 2025; and

WHEREAS, the NPS held a consulting party meeting to discuss the Assessment of Effects on June 16, 2025, and requested comments on the Assessment of Effects Report by July 7, 2025; and

WHEREAS, the MD SHPO concurred with the NPS on July 1, 2025, that the Undertaking will have an adverse effect on Clara Barton Parkway from replacement of the cantilever structure, reconstruction of the retaining walls, and removal of the Glen Echo Overpass; and

WHEREAS, the NPS and MD SHPO agree the Undertaking is not likely to adversely affect archeological resources because there are no known archeological resources in the APE and the soils within the area of direct effects (where ground-disturbing activities would occur) have been heavily disturbed by construction of Clara Barton Parkway; and

WHEREAS, the NPS and MD SHPO agree the Undertaking will have no adverse effect on Clara Barton National Historic Site, Glen Echo Park Historic District, the Carousel, the Chautauqua Tower, C&O National Historical Park, and Lock #7 and Lock Keeper's House; and

WHEREAS, the NPS and MD SHPO agree the Undertaking is anticipated to have no adverse effect on the Spanish Ballroom at Glen Echo Park because of implementation of measures to prevent construction vibrations from impacting the structure; and

WHEREAS, the NPS notified the Advisory Council on Historic Preservation (hereinafter ACHP) in accordance with 36 CFR § 800.6(a)(1) on July 9, 2025, that the proposed Undertaking will adversely affect historic properties and that an Agreement will be developed with the MD SHPO; and the ACHP declined to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

WHEREAS, this Agreement provides the mechanism to resolve the adverse effects of the Undertaking and complete the requirements of Section 106 of the NHPA (54 USC 306108) and its implementing regulations (36 CFR Part 800) for the Undertaking; and

NOW, THEREFORE, the NPS and MD SHPO agree that the Undertaking shall be implemented in accordance with the following stipulations to account for the adverse effects of the Undertaking on historic properties.

STIPULATIONS

I. Avoidance, Minimization, and Mitigation to Resolve Adverse Effects

The NPS shall ensure that the following measures are carried out to resolve adverse effects on Clara Barton Parkway and prevent adverse effects on the Spanish Ballroom at Glen Echo Park:

A. Level II Historic American Engineering Record (hereinafter HAER) Documentation

Prior to commencement of any Project-related site work, demolition or construction, the NPS shall prepare Level II HAER documentation for both the cantilever structure and Glen Echo Overpass. The Level II documentation shall include:

1. A Written Historical Report of the history, significance, and descriptions of the structures following the HAER *Guidelines for Historical Reports* (2008, updated December 2017). Information in the report shall include an introduction and statement of significance; historical context (design, construction, use); description of physical features and condition; information

about the designer, engineer, or builder; and a bibliography.

2. Large-Format Photographs of the current condition of the structures and their significant features that follow NPS Heritage Documentation Programs *HABS/HAER/HALS Photography Guidelines* (November 2011, updated June 2015). The photographs shall include black-and-white, large-format negatives; contact prints on fiber-based photographic paper; and shall be archivally processed and properly captioned.
3. Measured Drawings showing the overall configuration and key details of the structures following the NPS Heritage Documentation Programs *Recording Historic Structures & Sites for the Historic American Engineering Record* (1994, revised 2020) and the Secretary of the Interior's *Standards and Guidelines for Architectural and Engineering Documentation* (2003). Drawings shall include elevations, sections, and details for each structure, and may be produced using CAD or hand-drafted to archival standards.
4. Field Notes and Supporting Documentation, including sketches, field measurements, maps, and any other documentation used to produce the drawings and photographs.
5. Submission of the draft HAER documentation to MD SHPO. MD SHPO shall provide comments on the draft submission within thirty (30) calendar days.
6. Final HAER documentation will be archived and made publicly available online by NPS and transmitted to the Library of Congress and MD SHPO within ninety (90) calendar days of receiving MD SHPO comments on the draft submission.

B. Construction Vibration Monitoring and Resource Protection

The NPS is aware that excavation of the hillslope and installation of rock bolts for slope stabilization has the potential to cause vibration spikes that may impact historic properties, particularly the Spanish Ballroom at Glen Echo Park, due to its proximity to the roadway. As such, the NPS shall develop and implement a vibration mitigation strategy to prevent adverse direct effects to the ballroom that may include the following measures, as appropriate:

1. Pre-Construction Planning & Assessment
 - Structural Assessment, including detailed visual inspection and structural condition, photographic and laser scan documentation, and identification of the most vulnerable elements of the structure (e.g., arches, vaults, foundations, frescoes, etc.).
 - Ground and Vibration Risk Analysis, including a geotechnical study of soil/rock type and vibration propagation.
 - Baseline Monitoring Setup, including installation of vibration sensors, setting conservative vibration thresholds, and installing real-time deformation detection sensors (if needed).
2. Construction Methods, Structural Protections, & Monitoring
 - Method Selection to Minimize Impact, including use of low-impact drilling methods instead of percussive drilling, and pre-drilling before inserting bolts rather than self-drilling anchors (which generate more vibration).
 - Equipment Modifications, including use of vibration-damped drill rigs and rubber-mounted tool connections, reducing drill speed and torque, and avoiding drilling during night-time or high-moisture conditions (which may worsen ground transmission).
 - Local Reinforcement, including use of temporary bracing on vulnerable components (e.g., arched windows, cornices, cracked walls), installing tie rods or tension cables across cracked or load-bearing walls (can be removed post-work), and laying vibration-isolating mats under sensitive interior features (e.g., statues, furniture, fragile finishes).
 - Real-Time Vibration Monitoring, including setting automated alerts when vibration thresholds are approached or exceeded and using portable vibration loggers to validate on-

site observations.

- On-Site Presence, including appointing a vibration protection officer or structural engineer to monitor activities in real time, and enforce a “pause and evaluate” protocol if vibration spikes occur.
- The NPS shall notify the MD SHPO within three (3) business days should any damage to the ballroom be identified during real-time monitoring.
- The NPS shall be responsible for rectifying any damage that may occur to the Spanish Ballroom because of construction in consultation with the MD SHPO and consulting parties.

3. Post-Construction Surveys & Monitoring

- Post-Construction Survey, including repeating a condition survey comparing crack widths, deflections, etc., to ensure no damage occurred, and reporting all data and findings in a transparent format to MD SHPO.
- Long-Term Monitoring (if needed), leaving vibration or deformation sensors in place for ninety (90) calendar days post-installation.
- The NPS shall notify the MD SHPO within three (3) business days should any damage to the ballroom be identified during post-construction monitoring.
- The NPS shall be responsible for rectifying any damage to the ballroom that is identified during the post-construction monitoring period and determined to have been caused by construction in consultation with the MD SHPO and consulting parties.

C. Construction Noise Monitoring and Resource Protection

Representatives of Glen Echo have expressed concern that construction noise may disrupt community residents and disturb visitors and events at Glen Echo Park. As such, the NPS shall develop and implement a noise mitigation strategy to minimize construction-related noise disruptions that may include the following measures, as appropriate:

1. Pre-Construction Planning, Assessment, and Coordination

- Regulatory Review, including review of Montgomery County’s Noise Control Ordinance at Chapter 31B of the County Code, to determine max construction dB(A) limits, restricted work hours, and other applicable requirements and/or restrictions.
- Noise Suppression Plan, developed under the guidance of an engineer familiar with the principles of acoustics, that details the use of the most effective noise-suppression equipment, materials, and methods appropriate and reasonably available for construction, following Montgomery County’s Noise Suppression Plan Guidelines and approved by the Montgomery County Department of Environmental Protection.
- Baseline Ambient Noise Survey within the anticipated daily work schedule for construction at sensitive receptors, including, but not limited to, the Spanish Ballroom at Glen Echo Park, as identified in coordination with MD SHPO, consulting parties, and representatives of Glen Echo and Glen Echo Park.
- Stakeholder Coordination, including representatives of Glen Echo and Glen Echo Park, to review proposed construction schedules and identify specific events in advance during which construction activities shall be limited, as necessary.

2. Construction Noise Control, Monitoring, & Engagement

- Equipment and Technique Modifications, as identified in the approved Noise Suppression Plan, to minimize construction noise.

- Real-Time Noise Monitoring, including installation of calibrated sound level meters at strategic locations identified in coordination with MD SHPO, consulting parties, and representatives of Glen Echo and Glen Echo Park, and continuous monitoring to ensure noise does not exceed maximum allowable limits.
- Community Engagement, including frequent updates on construction progress, sharing of event calendars to avoid disruption during special events, and assigning a construction-community liaison that can be contacted directly with any construction-related concerns.

D. Public Interpretation Signage

The NPS shall develop and install interpretive signage in consultation with the MD SHPO as outlined below:

1. Purpose and Interpretive Goals

The interpretive signage shall serve to educate the public about the historical significance of the Clara Barton Parkway, including the design and function of the original cantilever structure and Glen Echo Overpass, and explain the need for their modification or removal. The signage shall highlight the parkway's role within the larger GW Parkway cultural landscape, the influence of mid-20th-century parkway planning, and the ingenuity of its infrastructure.

2. Content Development

- Signage content shall describe the historical design of the Glen Echo Overpass and cantilever structure, their purpose and uniqueness, and the reasons for their removal or replacement.
- The signage shall address the larger narrative of transportation planning, federal parkway development, and the parkway's construction and design constraints.
- Interpretive content shall be written for a general audience and may include period and contemporary photographs, diagrams, or maps illustrating the structures and the noticeable modifications made to the structures as part of the project.

3. Design Specifications

- The signage shall be constructed using durable, weather-resistant materials in conformance with NPS wayside exhibit standards.
- It shall be visually compatible with Clara Barton Parkway's landscape character and meet current accessibility guidelines (e.g., for font size, color contrast, and tactile readability, if applicable).
- Final design shall be consistent with the NPS Unigrid system and incorporate the NPS arrowhead logo.

4. Consultation and Review

- NPS shall prepare draft signage text, layout, and proposed images and submit them to MD SHPO for review and comment.
- MD SHPO shall have thirty (30) calendar days to provide comments. NPS shall revise the materials based on those comments and provide a final version for approval.
- No fabrication shall proceed without MD SHPO's written concurrence on final design and content.

5. Location and Installation

- The signage shall be installed in a publicly accessible area near the cantilever structure, where it is visible and safely accessible to visitors.

- Final location shall be determined in coordination with MD SHPO to balance interpretive visibility, visitor safety, and landscape compatibility.
- Installation shall occur no later than ninety (90) calendar days after completion of the construction work associated with the Undertaking.

6. Documentation and Reporting

- NPS shall provide MD SHPO and consulting parties with photographic documentation of the installed signage and a digital record of the final text and design within thirty (30) calendar days of installation.

7. Maintenance

- NPS shall be responsible for the upkeep of the signage, including cleaning, repair, and replacement, for a period of at least ten (10) years or until the signage is intentionally decommissioned, whichever is longer.

II. Standards and Special Conditions

A. Definitions

The definitions provided at 36 CFR § 800.16 are applicable throughout this Agreement.

B. Project Standards

The standards, guidelines, and regulations cited below shall be followed in execution of the Undertaking:

1. Professional qualification standards: All historic preservation activities implemented pursuant to this Agreement shall be carried out by or under the direct supervision of individuals meeting the Secretary's Historic Preservation Professional Qualifications Standards (48 FR 44738-39) for the discipline appropriate to the activity.
2. Standards for inventory, evaluation, registration, and documentation: Inventory, evaluation, registration, and documentation of any changes to Clara Barton Parkway shall be done in accordance with the guidance and criteria for the National Register.
3. Curation standards: If applicable, curation of materials and records resulting from actions stipulated by this Agreement shall be in accordance with 36 CFR § 79. Such materials and records shall be curated by NPS in accordance with the *Standards & Guidelines for Architectural and Historical Investigations in Maryland* and/or the *Standards & Guidelines for Archaeological Investigations in Maryland*, including the *Standards and Guidelines Update 1: Archaeology, Standards for Curation*.

III. Unanticipated Archeological Discoveries

NPS and MD SHPO do not anticipate intact archeological resources to be present within the area of direct effects since soils have been heavily disturbed by construction of Clara Barton Parkway. However, if previously unidentified, potentially significant archeological resources are unanticipatedly discovered, the construction contractor shall immediately halt all activities in the area of the resource and notify NPS. The NPS and MD SHPO shall then follow the following procedures in the event of an unanticipated discovery:

- A. The NPS and construction contractor shall take all reasonable measures to avoid or minimize harm to the resource.
- B. The NPS shall notify the MD SHPO and the American Indian tribes (as applicable) within two (2) working days of the discovery.
- C. The NPS shall provide the MD SHPO with a written preliminary assessment of National Register eligibility of all unanticipated discoveries during the Project. The assessment shall describe actions proposed to resolve any potential adverse effects before work continues in the vicinity of the discovery.

- D. The NPS shall provide the MD SHPO with any comments received from the American Indian tribes within two (2) working days of receipt of the comments.
- E. The MD SHPO shall respond to the NPS within two (2) working days of the notification of an unanticipated discovery and the NPS's assessment of eligibility. The NPS shall consider the MD SHPO's recommendations regarding National Register eligibility and proposed actions.
- F. If the NPS determines that MD SHPO objections to the proposal of actions cannot be resolved, the NPS shall proceed consistent with 36 CFR 800.2(b)(2) as outlined in Stipulation IV.C.

IV. Administrative Stipulations

A. Amendments

Either Signatory may propose amendments to this Agreement pursuant to 36 CFR § 800.6(c)(7). This Agreement may be amended only upon the written agreement of both Signatories. The amended Agreement will take effect on the date it is executed by both Signatories.

B. Termination

The following process will be followed to terminate this Agreement:

1. Proposed termination: A Signatory can propose termination of this Agreement in writing to the other Signatory explaining the reasons for proposing termination. The Signatories shall consult for 30 days to seek alternatives to termination.
2. Amendment in lieu of termination: If the consultation results in an agreement on an alternative to termination, the Signatories shall proceed to amend this Agreement in accordance with Stipulation IV.A.
3. Failure to agree: If consultation does not result in an agreement on an alternative to termination, a Signatory may terminate this Agreement by promptly notifying the other Signatory party in writing. Such termination will remove all force and effect from this Agreement.
4. Process to terminate: Should this Agreement be terminated, the NPS shall consult with MD SHPO to develop a new agreement in accordance with 36 CFR § 800.14(b). Until and unless a new agreement is executed for the Undertaking, the NPS shall consult with MD SHPO in accordance with 36 CFR §§ 800.4 - 6.

C. Dispute Resolution

Should the MD SHPO object at any time to any actions proposed or the way the terms of this Agreement are implemented, all work that is the subject of the dispute will stop until the dispute is resolved according to the procedures in this stipulation and the NPS shall consult with the MD SHPO to resolve the objection. If the NPS determines, within 30 days, that such objections(s) cannot be resolved, the NPS shall:

1. Notification and Comment: Forward all documentation relevant to the dispute to the ACHP in accordance with 36 CFR § 800.2(b)(2). Any comment provided by the ACHP, and all comments from the MD SHPO, will be considered by the NPS in reaching a final decision regarding the dispute.
2. No Comments: If the ACHP does not provide comments regarding the dispute within 30 days after receipt of adequate documentation, the NPS may render a decision regarding the dispute. In reaching its decision, the NPS shall consider all comments regarding the dispute from the MD SHPO.
3. NPS Responsibility: It is the NPS's responsibility to carry out all other actions subject to the terms of this Agreement that are not the subject of the dispute. The NPS shall notify all parties of its decision in writing before implementing that portion of the Undertaking subject to dispute under this stipulation. The NPS's decision will be final.

D. Reporting Requirement for this Agreement

The NPS shall submit an annual report on the progress made toward the completion of the requirements of this Agreement and the Undertaking as part of the NPS's annual Section 106 reporting requirements.

1. **Content:** Reporting will include updates on progress of actions called for in Stipulations I-III of this Agreement and any agreed upon changes to this Agreement. The report will also include consultation history on unanticipated discoveries and any associated consultation efforts.
2. **Distribution:** The annual report will be provided to the MD SHPO and ACHP. The report will also be distributed to American Indian tribes if unanticipated Native American archeological site(s) are uncovered.

E. Duration of this Agreement

Unless terminated pursuant to Stipulation IV.B, the duration of this Agreement is 10 years from execution of the Agreement or until the Signatories confirm that the Undertaking and associated mitigations are complete, whichever comes first. An extension of the agreement may be made through an amendment in accordance with Stipulation IV.A.

F. Effective Date of this Agreement

This Agreement will take effect on the date that it is executed by the NPS and MD SHPO.

G. Anti-Deficiency Act Statement

The Anti-Deficiency Act (31 USC 1341) prohibits federal agencies from incurring an obligation of funds in advance of or in excess of available appropriations. Accordingly, the parties agree that any requirements for the obligation of funds arising from the terms of this Agreement shall be subject to the availability of appropriated funds, and that this agreement shall not be interpreted to require the obligation or expenditure of funds in violation of the Anti-Deficiency Act.

H. Execution of this Agreement in Counterparts

This Agreement may be executed in counterparts with a separate page for each Signatory. The NPS shall ensure that each Signatory is provided with a copy of the fully signed and executed Agreement.

Execution of this Memorandum of Agreement by the NPS and MD SHPO and implementation of its terms evidence that the NPS has considered the effects of this Undertaking on historic properties and afforded the ACHP an opportunity to comment.

MEMORANDUM OF AGREEMENT
BETWEEN THE
NATIONAL PARK SERVICE
AND THE
MARYLAND STATE HISTORIC PRESERVATION OFFICE
REGARDING THE
CLARA BARTON PARKWAY CANTILEVER AND GLEN ECHO OVERPASS

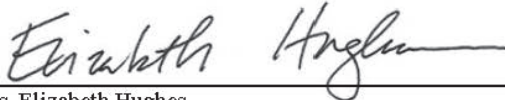
JENNIFER MADELLO Digitally signed by JENNIFER MADELLO
Date: 2026.01.09 10:11:57 -0500

January 9, 2025

Ms. Jennifer Madello
Superintendent
George Washington Memorial Parkway

Date

MEMORANDUM OF AGREEMENT
BETWEEN THE
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AND THE
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REGARDING THE
CLARA BARTON PARKWAY CANTILEVER AND GLEN ECHO OVERPASS



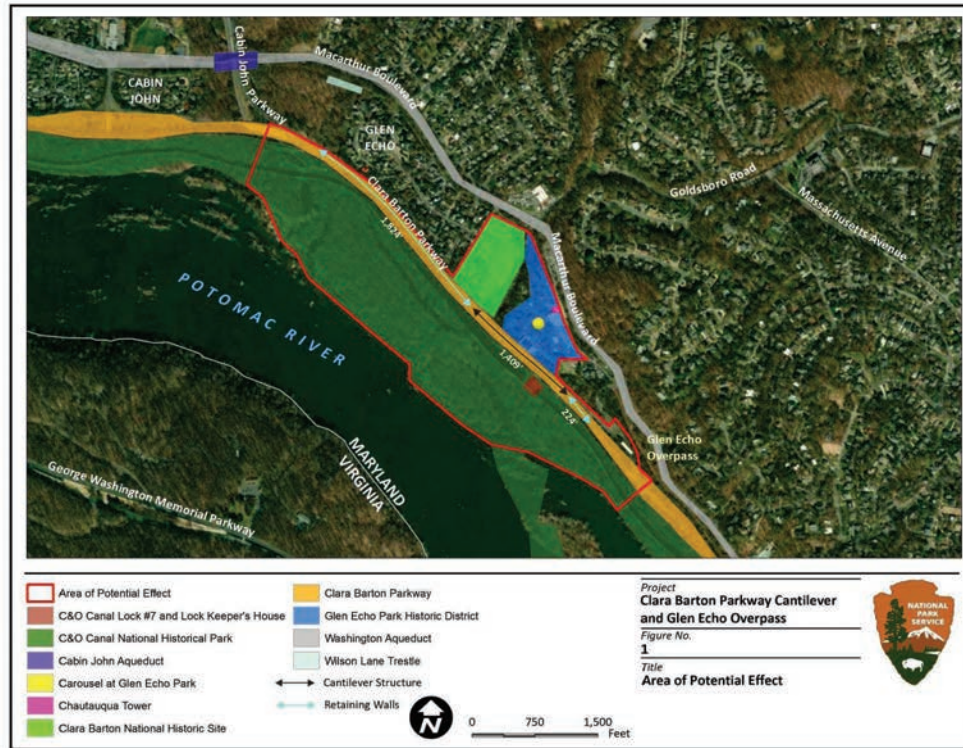
Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust

January 8, 2026

Date

**Clara Barton Parkway Cantilever and Glen Echo Overpass
Attachment A – Area of Potential Effect Map**

The APE for the Project includes Clara Barton Parkway and adjacent historic properties as presented on Figure 1.



ATTACHMENT E: AGENCY CONSULTATION CORRESPONDENCE



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, Virginia 22101

December 18, 2024

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

Attn: Ms. Becky Roman, Office of Preservation Services

Re: Initiation of Section 106 Consultation, Clara Barton Parkway Cantilever and Bridge to Nowhere
Montgomery County, Maryland

Dear Ms. Hughes:

The National Park Service (NPS) is proposing rehabilitation/replacement of the cantilever structure and adjacent retaining walls on Clara Barton Parkway. Additionally, NPS is considering demolition of an associated feature, the “bridge to nowhere”. George Washington Memorial Parkway (GWMP), the NPS administrative unit responsible for the Clara Barton Parkway, wishes to formally initiate consultation with Maryland Historical Trust (MHT), serving as the Maryland State Historic Preservation Office (SHPO), in compliance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800).

DESCRIPTION OF THE UNDERTAKING

Cantilever and Retaining Walls

The proposed project involves rehabilitation/replacement of 1,409 feet of a cantilever structure and 2,048 feet of adjacent retaining walls on the Clara Barton Parkway between Cabin John Parkway and the Macarthur Boulevard exit ramp (Figure 1). The cantilever structure and adjacent retaining walls are exhibiting widespread deterioration. Phase 1 of the project consisted of an in-depth study of the concrete slab and retaining walls, and determination of the levels of deterioration and future rehabilitation or reconstruction needs. Testing indicated that corrosion of the reinforcing steel has begun and is likely to worsen. A report, prepared by Clark Nexsen of the Federal Highway Administration (FHWA), concluded that the useful remaining service life of the structure was estimated to be approximately five years from completion of the study in November 2020. A subsequent inspection in October 2023 confirmed the timeline of the estimated remaining service life, and as such, the FHWA has recommended action be taken. Otherwise, widespread corrosion of the steel will reduce the load-carrying capacity of the cantilever structure and severely impact its structural integrity. If action is not taken, the NPS may be required to implement weight restrictions on the Clara Barton Parkway or completely close the inside northbound and southbound lanes to traffic for safety. This would cause substantial traffic impacts, as the

Clara Barton Parkway is an essential thoroughfare in the area with approximately 40,000 daily users. As such, NPS is evaluating several alternatives to either rehabilitate or replace the cantilever structure and retaining walls. A preferred solution will be identified using value-based analyses, as well as public and agency input during the Section 106 and National Environmental Policy Act (NEPA) compliance processes. Photographs of the cantilever structure from northbound and southbound Clara Barton Parkway are attached to this letter.

The Maryland segment of the Clara Barton Parkway was constructed between 1957 and 1965. Within the area of potential effect (APE), the terrain is so restrictive that designers used retaining walls and the cantilever structure to fit the Clara Barton Parkway between the Chesapeake and Ohio (C&O) Canal and the bluffs leading up to Glen Echo and Brookmont. Instead of panoramic views like the George Washington Memorial Parkway in Virginia, the Clara Barton Parkway focuses on internal views to historic structures of the C&O Canal and the Washington Aqueduct that represent the history of the landscape as an infrastructural corridor.

The cantilever structure and retaining walls are contributing resources to the Clara Barton Parkway as documented in the Clara Barton Parkway Cultural Landscape Inventory (CLI) prepared in 2015. **According to the CLI**, “The parkway has changed a little since its completion. The cantilever was re-engineered and rehabilitated in 1992, and the work is generally compatible with the historic design.”

Bridge to Nowhere

The Glen Echo overpass, or “bridge to **nowhere**”, was built in 1961 as part of the later abandoned plan to expand the Clara Barton Parkway to four travel lanes inbound into Washington, DC. As the parkway expansion never came to fruition, the structure has remained unused by traffic since its completion. The bridge to nowhere crosses over the northbound lane of the Clara Barton Parkway but is unconnected to the surrounding roadway network. The bridge is deteriorating and as such, the NPS is evaluating whether demolition is appropriate at this time based on the future risk and needs for rehabilitation that the structure is likely to require if left in place. If no action is taken, corrective measures would be required to maintain the structure and prevent the possible development of serious and costly problems in the future. Photographs of the bridge to nowhere from northbound Clara Barton Parkway and from the bridge deck are attached to this letter.

The bridge to nowhere is a contributing resource to the Clara Barton Parkway as documented in the Clara Barton Parkway CLI (2015). **According to the CLI**, “[The bridge] was similar in design to the Cabin John Creek Bridge with angled piers arcing into the concrete beams and steel guardrails, keeping it light and relatively delicate in appearance. Because it would have been more visible to motorists, it would have rivaled the Cabin John Creek Bridge as the most prominent example of the modern bridges of the parkway. As with the other bridges, the modernity of the engineering is contrasted with rustic rock, in this case a rock outcrop from which the bridge springs.”

AREA OF POTENTIAL EFFECT

The NPS has developed a graphic illustration of the draft APE that is subject to modification through the consultation process and is attached as **Figure 2**. The NPS anticipates direct effects within the APE would be confined to the Clara Barton Parkway and location of the bridge to nowhere. The APE has been expanded to consider indirect effects to adjacent historic properties and to include the limited views of the bridge to nowhere.

HISTORIC STRUCTURES AND DISTRICTS

The draft APE overlaps with the boundaries of several historic properties, including the George Washington Memorial Parkway / Clara Barton Parkway (M: 35-61), Clara Barton National Historic Site

(M: 35-25), Glen Echo Park Historic District (M: 35-41), and C&O Canal National Historical Park (NHP) (M: 12-46). The **C&O Canal Lock #7 and Lock Keeper's House (M: 35-27)** has not been evaluated for individual listing in the National Register but is a contributing resource to the C&O Canal NHP and is in the APE. The Carousel at Glen Echo Park (M: 35-39) and the Chautauqua Tower (M: 35-26) are individually listed in the National Register and contribute to the significance of the Glen Echo Park Historic District. The Cabin John Aqueduct (M: 35-37) and the Washington Aqueduct (M: 29-49) are near, but not within, the draft APE. These historic properties are identified on the APE map provided as **Figure 2**.

There are five Maryland Inventory of Historic Properties (MIHP) resources that have not been evaluated for their National Register eligibility that are near, but not within, the APE. These include the Brookmont Trolley Right-of-Way (M: 35-31), Stonehaven (M: 35-44), Reading House (M: 35-24), Potomac Overlook (M: 35-157), and Inn at Glen Echo (M: 35-40).

Additionally, the Wilson Lane Trestle (M: 35-31-1), part of the Brookmont Trolley Line, has been determined eligible for listing in the National Register, but is not within the APE. The trestle is planned for demolition by the Washington Metropolitan Area Transit Authority (WMATA). Demolition is anticipated in 2025 or 2026.

ARCHEOLOGICAL RESOURCES

Two archeological surveys have been conducted within the APE, the most recent of which occurred almost 45 years ago.

Larrabee, Edward McMillan

1962 *A Survey of Historic and Prehistoric Archeological Sites Along the Chesapeake & Ohio Canal National Monument 1961-1962*. Contracting Archeologist. Report on file (No. MO 41), Maryland Historical Trust, Crownsville, Maryland.

In 1961-1962, a study was conducted along the entirety of the Chesapeake & Ohio Canal National Monument property from Cumberland to the Washington, DC boundary line (MHT Report No. MO 41). This study did not include Clara Barton Parkway itself, or the area that would become the parkway since it was under construction at the time. The survey mainly consisted of a map and literature review, informant interviews, and field survey consisting of pedestrian survey, surface collection, and minimal subsurface excavation. It is unclear from the reporting what methods were used within the current project APE and if any subsurface excavations were conducted.

Franklin, Katherine, and Sarah Gregory

1980 *Report on a Reconnaissance Archeological Survey of Park Service Property Affected By the Rock Run WSSC Alternate Points of Discharge*. National Park Service, Denver Service Center, National Capital Team. Report on file (No. MO 43), Maryland Historical Trust, Crownsville, Maryland.

The second survey was conducted in 1980 on NPS property along the Potomac River from Chain Bridge to 0.1-mile north of Brickyard Road, between Macarthur Boulevard and the Potomac River (MHT Report No. MO 43). This survey encompassed the APE. The survey consisted of map and literature review, surface reconnaissance, and limited controlled subsurface testing. However, no subsurface excavations were conducted in **"Section 4" of the survey, which includes the APE**. Regarding a proposed pumping station on the west side of Cabin John Creek between the northbound and southbound ramps of the Cabin John Parkway, just north of Clara Barton Parkway, the study recommended monitoring in this area. This was due to the potential to encounter the remains of various structures erected in the area during the mid-nineteenth-century construction of the Union Arch Bridge / Cabin John Aqueduct. These structures

include boarding houses for laborers, saloons, and other similar buildings. The study theorized that the remains of some of these buildings could be located below or in the vicinity of the southbound lanes of the Cabin John Parkway under an unknown amount of fill.

The survey identified several other significant historic resources within the APE, including the Glen Echo Chautauqua site (Glen Echo Park; 18MO153) and the Clara Barton House (18MO154), both of which are adjacent to the Clara Barton Parkway to the northeast. It was noted that archaeological investigations of these sites had not yet been done, and none appear to have been conducted since; therefore, the extent of any intact subsurface remains associated with these sites is not known. The survey also identified the Washington and Great Falls Electric Railroad trolley-car line (18MO166) that ran just south of Macarthur Boulevard as a significant resource and noted that remains of rail-related infrastructure could be present. This resource is close to the Clara Barton Parkway only in the very southeastern extent of the APE. The survey identified Lock 7, located between the Clara Barton Parkway and the C&O Canal, as the most significant resource and recommended careful and close monitoring in its vicinity. It is not known whether subsequent monitoring occurred at any of these areas as no further reporting is available.

SECTION 106 CONSULTATION AND NEPA COORDINATION

In accordance with the Section 106 implementing regulations issued by the Advisory Council on Historic Preservation (36 CFR part 800; ACHP), NPS will coordinate Section 106 consultation and ensure the meaningful involvement of all consulting parties while assessing the effects of the proposed undertaking on historic properties within the APE. Later, continued consultation will strive for agreement on the determination of effect to historic properties and whether any potential adverse effects to historic properties might be avoided, minimized, or mitigated.

The NPS will prepare an Environmental Assessment (EA) to document the analysis of potential impacts of the proposed Clara Barton Parkway cantilever rehabilitation / replacement and potential bridge to nowhere demolition in accordance with the NEPA. The NPS plans to coordinate the Section 106 and NEPA processes per the implementing regulations (36 CFR § 800.8) of the NHPA. The NPS will also develop an Assessment of Effects (AOE) for the project as a separate, but parallel, process to NEPA compliance.

CONSULTING PARTIES

In accordance with 36 CFR Part 800.2(c), NPS identified parties that may be interested in the proposed Clara Barton Parkway cantilever rehabilitation / replacement and potential bridge to nowhere demolition and their effects on historic properties. The following organizations will be invited to participate as consulting parties:

Maryland Historical Trust	National Capital Planning Commission
Catawba Nation	NPS, C&O Canal NHP
Chickahominy Indian Tribe	C&O Canal Trust
Chickahominy Indians Eastern Division	C&O Canal Association
Delaware Nation	Montgomery Planning – Historic Preservation Office
Eastern Shawnee of Oklahoma	Heritage Montgomery
Monacan Indian Nation	Montgomery History
Nansemond Indian Tribe	Montgomery Preservation
Pamunkey Indian Tribe	Preservation Maryland
Rappahannock Tribe of Virginia	Glen Echo Park Partnership for Arts and Culture
Seneca Cayuga Nation	Accohannock Indian Tribe
Shawnee Tribe	Piscataway Conoy
Upper Mattaponi Indian Tribe	Piscataway Indian Tribe

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

We look forward to beginning the Section 106 consultation process for this project. If you have any questions or preliminary feedback related to the project, the draft APE, historic properties identified within the APE, the need for archeological assessment, or the list of consulting parties, please contact Megan Bailey, Cultural Resources Program Manager for the George Washington Memorial Parkway, at megan_bailey@nps.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'CSmith', written in a cursive style.

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



Photo: Cantilever structure from southbound Clara Barton Parkway



Photo: Cantilever structure from northbound Clara Barton Parkway

Clara Barton Parkway Cantilever and Bridge to Nowhere

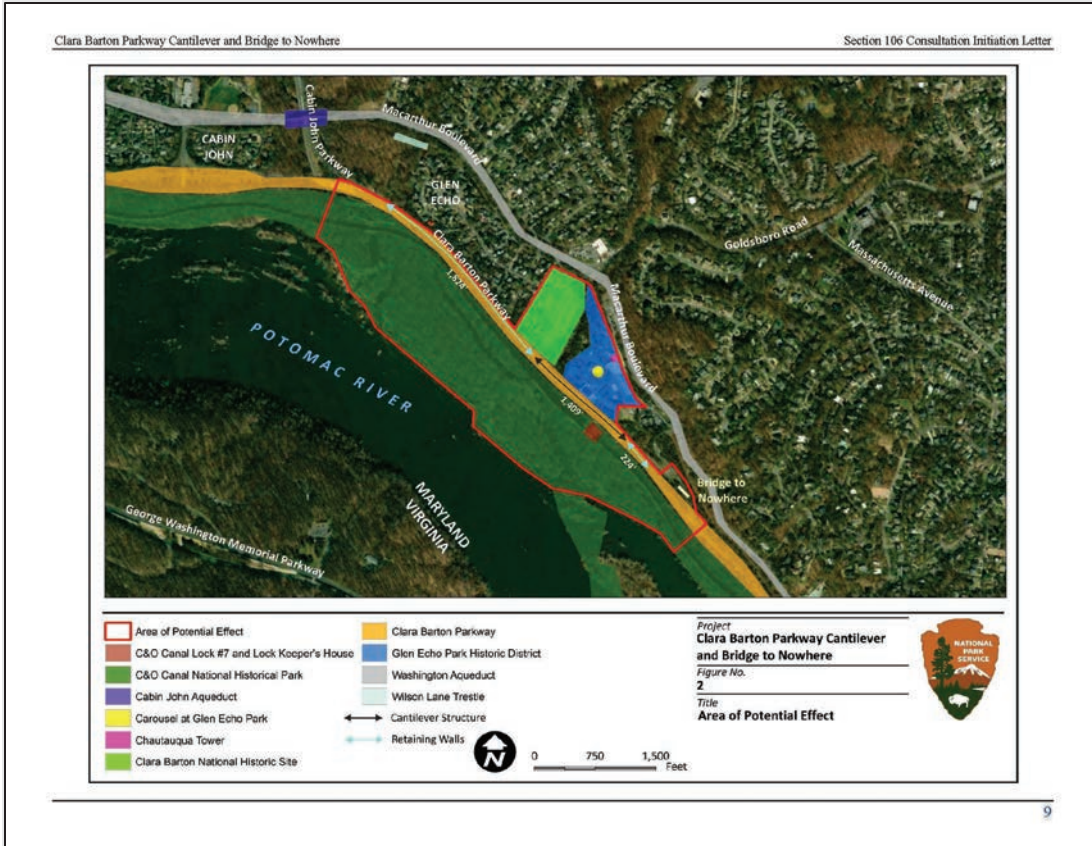
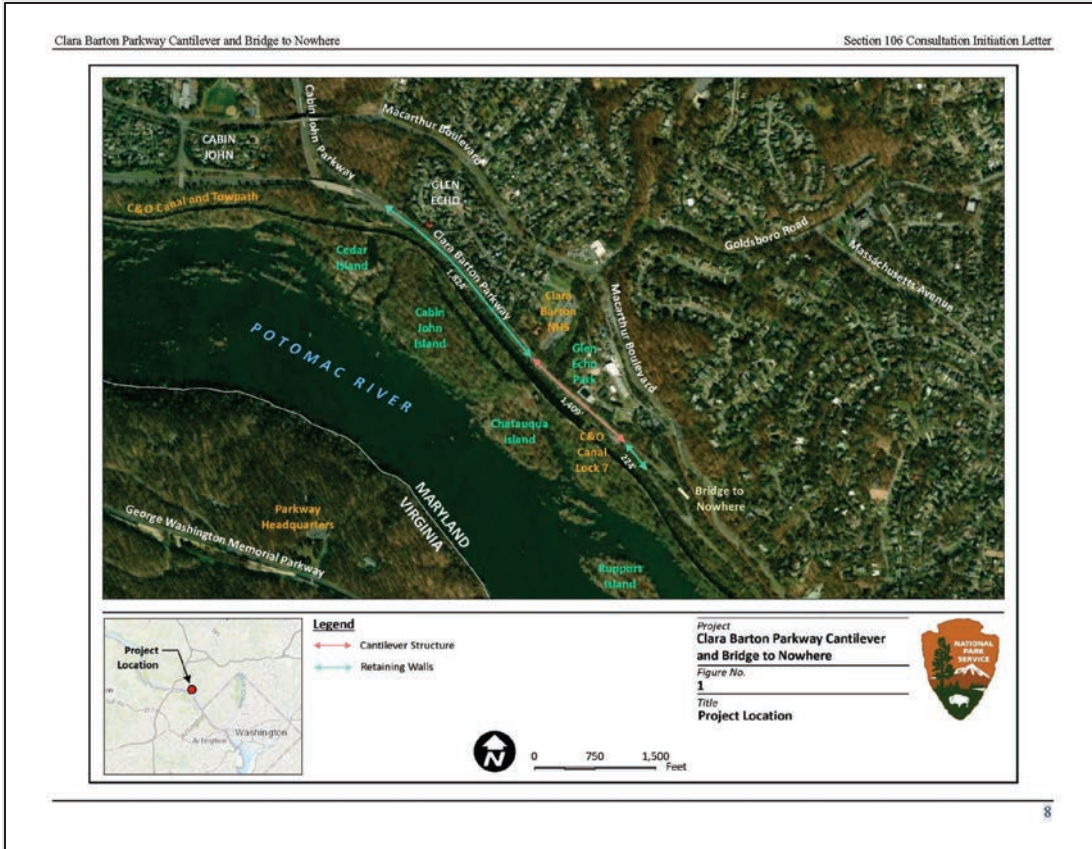
Section 106 Consultation Initiation Letter



Photo: Bridge to nowhere from northbound Clara Barton Parkway (Source: Google Street View)



Photo: Bridge to nowhere from bridge deck



Schrader, Brett

From: Bailey, Megan M <megan_bailey@nps.gov>
Sent: Wednesday, January 15, 2025 1:45 PM
To: Schrader, Brett; Hammig, Laurel D; Joseph, Maureen; Kattula, Steven R; Emington, Wayne R; Fetzer, Julie A; Gorder, Joel S; Keeler, Carolyn; DeChard, Sandra; Sybert, Mike; Ceglarek, John A
Subject: Fw: [EXTERNAL] MHT e106 project review – MHT Completed Comments

FYI - The MD SHPO responded to our initiation letter for the Clara Barton Parkway Cantilever project. Note that in their opinion, an archeological survey isn't needed for this project, but they defer to NPS.

Megan

--

Megan Bailey, PhD
Cultural Resources Program Manager
George Washington Memorial Parkway
700 George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101
703.289.2509 (office)
202.438.6641 (cell)
megan_bailey@nps.gov

From: Maryland Historical Trust <donotreply@maryland.gov>
Sent: Tuesday, January 14, 2025 7:05 PM
To: Bailey, Megan M <megan_bailey@nps.gov>
Subject: [EXTERNAL] MHT e106 project review – MHT Completed Comments

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

Date: January 14, 2025

To: Megan Bailey
National Park Service

Project Name: Clara Barton Parkway Cantilever Rehabilitation/Replacement

County: Montgomery County

Agency: National Park Service

Second Agency: -- Not noted --

MHT Log #: 202405432

MHT Response: Thank you for providing the Maryland Historical Trust the opportunity to comment on the above-referenced undertaking using the MHT e106 system. The Maryland Historical Trust has reviewed the submitted project for its effects on historic and archeological resources, pursuant to Section 106 of the National Historic Preservation Act of 1966 and/or the Maryland Historical Trust Act of 1985. We offer the following comments and/or concurrence with the agency's findings: **Please refer to the note below or attached document for MHT's comments on the undertaking and/or specific recommendations for continuing consultation with our office.**

Thank you for your recent letter initiating Section 106 consultation with MHT for this undertaking. We concur with the defined APE, list of identified known historic properties in the APE, and appreciate the extensive list of consulting parties developed by your office. In MHT's opinion, no archeological studies are needed for this undertaking. We await a decision by the NPS on the need, or not, for archeological investigations with this undertaking. MHT looks forward to continued consultation with NPS and other involved parties, including receipt of your assessment of effect and determination of effect on historic properties. Have a great rest of your week, Becky

Thank you for your cooperation in this review process. Since the MHT response is now complete, this response will appear in the Completed section of your project dashboard. No hard copy of this response or attachments will be sent. If you have questions, please contact the following MHT project reviewers:

Becky Roman becky.roman@maryland.gov



Maryland Historical Trust
Project Review and Compliance
100 Community Place
Crownsville, MD 21032
mht.section106@maryland.gov

MHT.Maryland.gov
Planning.Maryland.gov

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United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, Virginia 22101

February 27, 2025

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

Attn: Ms. Becky Roman, Office of Preservation Services

Re: Continuation of Section 106 Consultation, Clara Barton Parkway Cantilever and Glen Echo Overpass, Montgomery County, Maryland (MHT Log #202405432)

Dear Ms. Hughes:

As detailed on our consultation initiation letter dated December 18, 2024, the National Park Service (NPS) is proposing rehabilitation or replacement of the cantilever structure and adjacent retaining walls on Clara Barton Parkway in Montgomery County, Maryland. Additionally, NPS is considering demolition of an associated feature, the Glen Echo Overpass, located southeast of the cantilever structure. See attached Project Location map and Area of Potential Effects (APE) map submitted with the initiation letter.

Personnel from George Washington Memorial Parkway (GWMP) – the NPS administrative unit responsible for the Clara Barton Parkway – the NPS National Capital regional office, and the Federal Highway Administration (FHWA), conducted an internal workshop to evaluate several concepts to either rehabilitate or replace the cantilever structure and retaining walls in December 2024. The workshop consisted of choosing a recommended concept considering both monetary and non-monetary factors. Several concepts were evaluated during the workshop, which culminated in the identification of a recommended replacement concept for the cantilever structure. Under the recommended concept, the existing retaining wall and footing would remain in place to mitigate soil movement during construction. The existing cantilever slab would be removed and a new replacement retaining wall would be constructed adjacent to the west side of the existing wall. Afterwards, a narrower cantilevered slab would be installed on top of the structure. See attached conceptual graphic of the recommended replacement concept.

Preliminary Effects Determination

The cantilever structure and retaining walls are contributing resources to the Clara Barton Parkway as documented in the Clara Barton Parkway Cultural Landscape Inventory (CLI) prepared in 2015. While the cantilever replacement would not be expected to have an adverse effect on the character of the landscape since the new replacement structure would look similar to the existing structure, the NPS anticipates the recommended alternative would result in an *Adverse Effect* from the replacement or concealment of historic fabric of the contributing cantilever structure and cultural landscape.

Similarly, the Glen Echo Overpass is a contributing resource to the Clara Barton Parkway as documented in the Clara Barton Parkway CLI (2015). As such, the NPS anticipates its proposed demolition would result in an *Adverse Effect* from the removal of historic fabric of the contributing bridge and cultural landscape.

The NPS has initiated preparation of Historic American Engineering Record (HAER) documentation of the cantilever structure and Glen Echo Overpass. Other actions to mitigate and minimize adverse effects will be determined in consultation with Maryland Historical Trust (MHT) and other stakeholders through the development of a Section 106 agreement document.

While we anticipate these adverse effects to the Clara Barton Parkway, the NPS remains committed to preparing an Assessment of Effects (AOE) Report to evaluate the proposed undertakings potential direct and indirect effects on all the historic properties identified within the APE.

Agency / Consulting Parties Meeting

The NPS invites MHT to a virtual agency scoping meeting on **Monday, March 17, 2025, from 10:30 a.m. - 12:30 p.m.** A Microsoft Teams calendar invitation will be issued to you via email in advance of the meeting. The purpose of the meeting is to present the proposed project to federal and state agencies, tribal governments, local governments, and other organizations and identified consulting parties in compliance with Section 106 of the National Historic Preservation Act (NHPA). The NPS will solicit discussion and feedback from the attendees.

Public Scoping Meeting

The NPS is also holding a virtual public scoping meeting that will comply with Section 106 of the NHPA, and its implementing regulations, as well as the National Environmental Policy Act (NEPA). The NPS will host the meeting using GoToWebinar on **Wednesday, March 19, 2025, at 6:30 p.m.** eastern standard time. The meeting will last approximately 1.5-hours and there will be an opportunity to submit questions. You can access the meeting a few ways. You do not need to pre-register for the meeting.

1. At the time of the meeting, click [here](#) to join on your computer or mobile device and enter the Webinar ID 490-176-803 and your email.
2. You can call into the meeting (no video) using the toll-free phone number 1-877-309-2074 and Phone Webinar ID: 674-488-941.

The webinar will be recorded and posted online at <https://parkplanning.nps.gov/clbacantilever> for you to review at your convenience if you are not able to attend the live session.

The NPS is accepting comments from **March 17 through April 16**. Formal comments can be submitted to GWMP_Superintendent@nps.gov or at <https://parkplanning.nps.gov/clbacantilever>.

If you prefer to mail your comments, make sure they are postmarked by March 5, 2025, to receive consideration. Mail comments to the following address:

Superintendent
Attn: Clara Barton Parkway Cantilever
700 George Washington Memorial Parkway
McLean, VA 22101

Clara Barton Parkway Cantilever and Glen Echo Overpass

Section 106 Continued Consultation

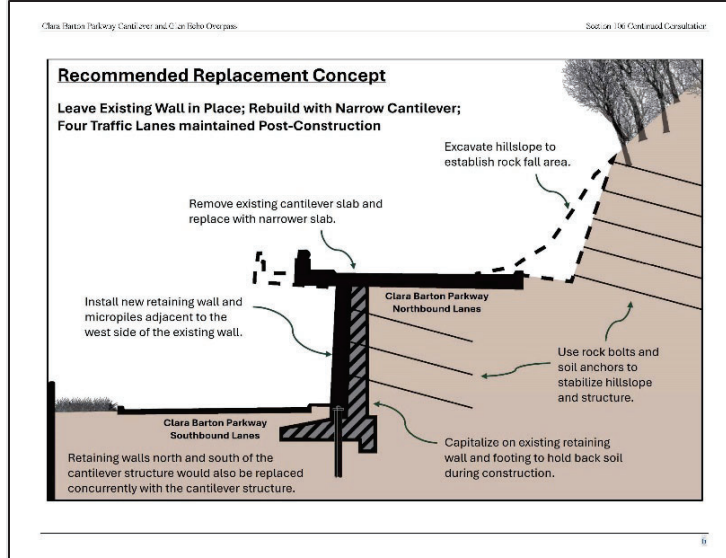
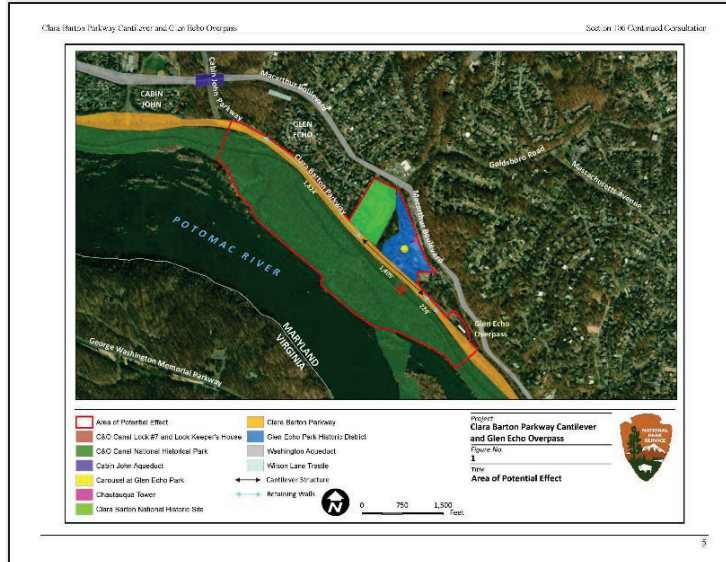
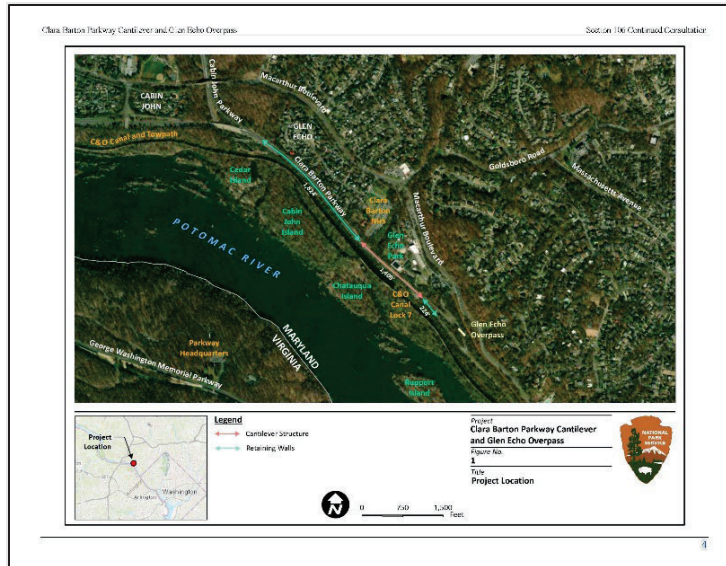
We look forward to continuing the Section 106 consultation process for this project, including identifying additional opportunities to mitigate adverse effects. If you have any questions or feedback, please contact Megan Bailey, Cultural Resources Program Manager for the George Washington Memorial Parkway, at megan_bailey@nps.gov.

Sincerely,

**JENNIFER
MADELLO**  Digitally signed by
JENNIFER MADELLO
Date: 2025.02.28 09:01:35
-05'00'

Jennifer Madello, Superintendent
George Washington Memorial Parkway

Attachments: Project Location Map, APE Map, Recommended Replacement Concept Graphic



Schrader, Brett

From: Hammig, Laurel D <Laurel_Hammig@nps.gov>
Sent: Wednesday, April 2, 2025 11:43 AM
To: Schrader, Brett
Subject: Fw: [EXTERNAL] Re: Continuation of Section 106 Consultation, Clara Barton Parkway Cantilever and Glen Echo Overpass, Montgomery County, Maryland (MHT Log #202405432)

FYI

Laurel Hammig, AICP
Memorials Program Manager
National Park Service, National Capital Region
(202) 875-3609 cell | Teams ([Call](#) / [Chat](#))
laurel_hammig@nps.gov

From: Becky Roman -MDP- <becky.roman@maryland.gov>
Sent: Wednesday, April 2, 2025 11:23 AM
To: Bailey, Megan M <megan_bailey@nps.gov>; GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>
Cc: Hammig, Laurel D <Laurel_Hammig@nps.gov>; Gladstone, Gail S <Gail_Gladstone@nps.gov>; Gorder, Joel S <Joel_Gorder@nps.gov>; Hershey, Christopher L <christopher_hershey@nps.gov>; Barlow, Erin <ERIN_BARLOW@NPS.GOV>; Madello, Jennifer <Jennifer_Madello@nps.gov>; Joseph, Maureen <Maureen_Joseph@nps.gov>; Dixie Henry -MDP- <dixie.henry@maryland.gov>
Subject: [EXTERNAL] Re: Continuation of Section 106 Consultation, Clara Barton Parkway Cantilever and Glen Echo Overpass, Montgomery County, Maryland (MHT Log #202405432)

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Jen Madello, Superintendent
Megan Bailey, Cultural Resources Program Manager
NPS George Washington Memorial Parkway

Good Morning,

Thank you for your recent submission to MHT and agency scoping meeting held on 3/17/2025 regarding the above-referenced undertaking to reconstruct the cantilevered portion of the Clara Barton Parkway / George Washington Memorial Parkway in Maryland (MHT log 202501373). We especially appreciate the agency scoping meeting that included likely Section 106 consulting parties for this undertaking. The presentation at that virtual meeting was very helpful in understanding the purpose and need for the preferred alternative, which shifts the cantilever into the hillside.

The Clara Barton Parkway (MIHP M:35-61) is considered eligible for listing on the National Register of Historic Places for its national significance under criteria (C) landscape architecture and (B) commemoration of Clara Barton. MHT agrees that the proposed undertaking is likely to cause an adverse effect on historic properties through relocation of the cantilever closer to the hillside and removal of the bridge to nowhere. We await the NPS' determination of effect on historic properties for the undertaking.

Please let me know if you have any questions or concerns. With part-time telework, I can best be reached by email. Future submission for this undertaking can be made by email to myself and mht.section106@maryland.gov, or via our MHT e106 submission website. MHT looks forward to working with the NPS-GWMP and other involved parties to complete the Section 106 consultation for this undertaking.

Happy Wednesday,
Becky



Becky Roman *(she, her, hers)*
Preservation Officer / Architectural Historian
Project Review and Compliance
Maryland Historical Trust
Maryland Department of Planning
100 Community Place, 3rd Floor, Crownsville, MD 21032
becky.roman@maryland.gov (410) 697-9587
Mht.maryland.gov

On Fri, Feb 28, 2025 at 1:32 PM GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov> wrote:
Good afternoon, Elizabeth,

On December 18, 2024, we provided an initial consultation letter regarding the National Park Service’s (NPS) proposed rehabilitation or replacement of the cantilever structure and adjacent retaining walls on the Clara Barton Parkway, as well as the potential demolition of the Glen Echo Overpass.

Please find attached a follow-up letter that outlines the results of our internal workshop, preliminary findings on adverse effects to historic resources, and details regarding upcoming agency and public scoping meetings in compliance with Section 106 of the National Historic Preservation Act and the National Environmental Policy Act.

We kindly request your review of the attached materials, and we look forward to your participation and feedback.

Jennifer Madello
Superintendent
George Washington Memorial Parkway

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Schrader, Brett

From: Becky Roman -MDP- <becky.roman@maryland.gov>
Sent: Tuesday, July 1, 2025 2:03 PM
To: GWMP Superintendent, NPS; Bailey, Megan M
Cc: Sullivan, Diane; Flis, Matthew; Free, Stephanie; nevshehirlan.stepan@epa.gov; glynn.rebecca@epa.gov; kennedy.cathleen@epa.gov; Cappetta, Tina; Landsman, Andrew P; kathleen.cullen@fws.gov; NSWCCD_CPAO@us.navy.mil; Katelyn Lucas; kevin.brown; kendall.stevens; wenonah.haire.catwba_contact; Caitlin Rogers; Inuckolls@estoo.net; info@umitribe.org; chiefannerich; marion@culturalheritagepartners.com; chief@nansemond.gov; Wayne.Adkins@chickahominytribe.org; Chief@monacannation.gov; dfrazier@astribe.com; wtarrant.sctribe_contact; piscatawayconoycouncil; Accohannock; tayac1; lkraus@sha.state.md.us; Lori Byrne -DNR-; qhu@mdot.maryland.gov; Paylor, Michael L; lgbinedion, Stella; marc.elrich@montgomerycountymd.gov; Friedson's Office, Councilmember; rebeccah.ballo; Director@HeritageMontgomery.org; mlogan@montgomeryhistory.org; mpi@montgomerypreservation.org; mayorcostello; townhall; nredding; Katey Boerner; Pamela Goddard; erogers; alan.bowser@gmail.com; jayrossmere@gmail.com; qjcapresidents@gmail.com; CSCApres@gmail.com; info@canaltrust.org; president@candocanal.org; tulip.hill.citizens.association@gmail.com; doran.flowers@gmail.com; bcaboard@bannockburncommunity.org; tom4tomorrow@gmail.com; pres@kpcanline.org; Fosselman, Peter C.; Joseph, Maureen; Kattula, Steven R; Hammig, Laurel D; Theuer, Jason; Schrader, Brett; Hershey, Christopher L; Elizabeth Hughes -MDP-; Collin Ingraham -MDP-; Dixie Henry -MDP-
Subject: Re: Clara Barton Parkway Cantilever Assessment of Effects Letter
Attachments: 202503001.pdf

You don't often get email from becky.roman@maryland.gov. [Learn why this is important](#)

Jennifer Madello, Superintendent
 Megan Bailey, Cultural Resources Program Manager
 George Washington Memorial Parkway
 National Park Service

Good afternoon Jen and Megan,

Thank you for your submission of the assessment of and finding of effect for this undertaking to MHT, as Maryland's SHPO, and the other consulting parties (MHT log 202503001). MHT concurs with the NPA that the undertaking will have an adverse effect on historic properties, due to removal and alteration of contributing elements to the NRHP eligible Clara Barton / George Washington Memorial Parkway (MIHP M: 35-61). Please see attached our signed concurrence.

MHT looks forward to working with the NPS staff and other consulting parties to resolve the adverse effect through minimization and mitigation. Please let us know by email if you have any questions.

Have a great rest of your week,
 Becky



Becky Roman *(she, her, hers)*
Preservation Officer / Architectural Historian
Project Review and Compliance
Maryland Historical Trust
Maryland Department of Planning
100 Community Place, 3rd Floor, Crownsville, MD 21032
becky.roman@maryland.gov (410) 697-9587
Mht.maryland.gov

On Fri, Jun 6, 2025 at 7:23 AM GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov> wrote:

Dear Consulting Parties,

The National Park Service (NPS) is continuing to develop plans for the proposed project to rehabilitate or replace the cantilever structure and adjacent retaining walls on Clara Barton Parkway, Montgomery County, Maryland. In addition, the NPS is proposing demolition of an associated feature, the Glen Echo Overpass.

In compliance with Section 106 of the National Historic Preservation Act, the NPS has assessed the effects of this undertaking on historic properties. Please see the attached letter for the agency's effect finding and a link to the Assessment of Effects Report for this project. The NPS seeks comments on these materials within 30 days of receipt of this correspondence.

We appreciate your participation and feedback.

Jennifer Madello
Superintendent
George Washington Memorial Parkway

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United States Department of the Interior

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

June 3, 2025

VIA EMAIL: NO HARD COPY TO FOLLOW

SUBJECT: *Section 106 Assessment of Effects for the Clara Barton Parkway Cantilever and Glen Echo Overpass Project, Montgomery County, Maryland*

Dear Consulting Parties:

The National Park Service (NPS) is continuing to develop plans for the proposed project to rehabilitate or replace the cantilever structure and adjacent retaining walls on Clara Barton Parkway, Montgomery County, Maryland. In addition, the NPS is proposing demolition of an associated feature, the Glen Echo Overpass.

The NPS initiated consultation with Maryland Historical Trust (MHT) pursuant to Section 106 of the National Historic Preservation Act in a letter sent on December 18, 2024. The letter described the project, defined a draft Area of Potential Effects (APE), and identified known historic properties within the APE. MHT acknowledged receipt of the initiation letter on January 14, 2025, and concurred with the APE and the list of historic properties within the APE.

Since initiating consultation, NPS has identified the Preferred Alternative, which serves as the undertaking for the purpose of the Section 106 compliance process. The undertaking involves the replacement of the cantilever structure and retaining walls, as well as demolition of the Glen Echo Overpass. The Assessment of Effects (AOE) Report, which is available to view and download on the NPS Planning, Environment, and Public Comment (PEPC) website - [ParkPlanning - Clara Barton Parkway Cantilever Project](#) - assesses the undertaking's potential effects on historic properties. This letter serves to inform you that in the application of the criteria of adverse effect, per 36 CFR 800.5(a), the NPS finds that the undertaking shall result in an *Adverse Effect* to historic properties, as the cantilever structure and Glen Echo Overpass are contributing features for the Clara Barton Parkway (MIHP M:35-61), which is considered eligible for listing on the National Register of Historic Places for its national significance under criteria (C) landscape architecture and (B) commemoration of Clara Barton.

Per 36 CFR 800.6, the NPS will continue consultation to resolve the adverse effect, to be documented in a Memorandum of Agreement. The AOE report includes some suggested mitigation measures for consideration, but the NPS will seek input from consulting parties and the public via the Section 106 and National Environmental Policy Act (NEPA) compliance processes. At this time, we are requesting your concurrence on the effect finding and also welcome comments on the AOE Report. Please respond within 30 days of receipt of this letter.

A consulting parties meeting has been scheduled during the 30-day review period to discuss the project and the AOE report. You will soon receive an invitation to attend this virtual meeting, which will take place on June 16, 2025, at 2:00-3:30 p.m.

Clara Barton Parkway Cantilever and Glen Echo Overpass

If you have any questions or comments, please contact me at gwmp_superintendent@nps.gov and copy Cultural Resources Program Manager Megan Bailey (megan_bailey@nps.gov). We appreciate your continued involvement in the Clara Barton Parkway Cantilever and Glen Echo Overpass Project.

Sincerely,

Jennifer Madello
Superintendent
George Washington Memorial Parkway

The Maryland Historical Trust *concur*s with the George Washington Memorial Parkway that the proposed project to replace the cantilever structure and adjacent retaining walls on Clara Barton Parkway and demolish the Glen Echo Overpass within the George Washington Memorial Parkway, Montgomery County, Maryland, will have an adverse effect on historic properties.

Signature: Elizabeth Hagan Date: 7/01/2025

The Maryland Historical Trust *does not concur* with the George Washington Memorial Parkway that the proposed project to replace the cantilever structure and adjacent retaining walls on Clara Barton Parkway and demolish the Glen Echo Overpass within the George Washington Memorial Parkway, Montgomery County, Maryland, will have an adverse effect on historic properties.

Signature: _____ Date: _____

Comments:

Schrader, Brett

From: Bailey, Megan M <megan_bailey@nps.gov>
Sent: Wednesday, August 13, 2025 5:07 PM
To: Schrader, Brett; Joseph, Maureen
Subject: Fw: [EXTERNAL] MHT e106 project review – MHT Completed Comments

FYI - MHT reviewed the draft MOA and only had one comment, about the proposed timeline-- see below.

--
Megan Bailey, PhD
Cultural Resources Program Manager
George Washington Memorial Parkway
700 George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101
703.289.2509 (office)
202.438.6641 (cell)
megan_bailey@nps.gov

From: Maryland Historical Trust <donotreply@maryland.gov>
Sent: Wednesday, August 13, 2025 4:13 PM
To: Bailey, Megan M <megan_bailey@nps.gov>
Subject: [EXTERNAL] MHT e106 project review – MHT Completed Comments

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Date: August 13, 2025
To: Megan Bailey
National Park Service

Project Name: Clara Barton Parkway Cantilever Rehabilitation/Replacement Draft MOA
County: Montgomery County
Agency: National Park Service
Second Agency: -- Not noted --
MHT Log #: 202503575

MHT Response: Thank you for providing the Maryland Historical Trust the opportunity to comment on the above-referenced undertaking using the MHT e106 system. The Maryland Historical Trust has reviewed the submitted project for its effects on historic and archeological resources, pursuant to Section 106 of the National Historic Preservation Act of 1966 and/or the Maryland Historical Trust Act of 1985. We offer the following comments and/or concurrence with the agency’s findings: **Please refer to the note below or attached document for MHT’s comments on the undertaking and/or specific recommendations for continuing consultation with our office.**

Greetings Megan - MHT has no comments on this draft MOA. Great Job! NPS may want to consider a time frame longer than 5 years depending on when you think the construction work will be completed. Please reach out with any questions. Have a great end to your week! -Becky

Thank you for your cooperation in this review process. Since the MHT response is now complete, this response will appear in the Completed section of your project dashboard. No hard copy of this response or attachments will be sent. If you have questions, please contact the following MHT project reviewers:

Becky Roman becky.roman@maryland.gov



Maryland Historical Trust
Project Review and Compliance
100 Community Place
Crownsville, MD 21032
mht.section106@maryland.gov

MHT.Maryland.gov
Planning.Maryland.gov

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Schrader, Brett

From: Katharine R. Kerr <kkerr@achp.gov>
Sent: Wednesday, July 16, 2025 2:23 PM
To: Bailey, Megan M
Cc: Joseph, Maureen; Hammig, Laurel D; Schrader, Brett
Subject: RE: [External] Notification of Undertaking with Adverse Effect - Clara Barton Parkway Cantilever and Glen Echo Overpass

You don't often get email from kkerr@achp.gov. [Learn why this is important](#)

On July 9, 2025, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the potential adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, Criteria for Council Involvement in Reviewing Individual Section 106 Cases, of our regulations, "Protection of Historic Properties" (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act, does not apply to this undertaking. Accordingly, we do not believe our participation in the consultation to resolve adverse effects is needed.

However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer, affected Indian Tribe, a consulting party, or other party, we may reconsider this decision. Should the undertaking's circumstances change, consulting parties cannot come to consensus, or you need further advisory assistance to conclude the consultation process, please contact us.

Pursuant to Section 800.6(b)(1)(iv), you will need to file the final Section 106 agreement document (Agreement), developed in consultation with the Maryland SHPO and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the Agreement and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with your notification of adverse effect. If you have any questions or require our further assistance, please contact e106@achp.gov and reference the ACHP Project Number #023293.

Katharine R. Kerr
 Digital Operations Coordinator
 Advisory Council on Historic Preservation
 401 F Street NW, Suite 308, Washington, DC 20001
 (202) 517-0216



www.achp.gov
www.facebook.com/usachp
 @usachp – X and Instagram
<https://www.youtube.com/channel/UCRreel63BktsEqSIdL396Ng>

From: Bailey, Megan M <megan_bailey@nps.gov>
Sent: Wednesday, July 9, 2025 4:53 PM
To: e106 <e106@achp.gov>
Cc: Joseph, Maureen <Maureen_Joseph@nps.gov>; Hammig, Laurel D <Laurel_Hammig@nps.gov>; Schrader, Brett <brett.schrader@stantec.com>
Subject: [External] Notification of Undertaking with Adverse Effect - Clara Barton Parkway Cantilever and Glen Echo Overpass

Hello,

The National Park Service - George Washington Memorial Parkway seeks to notify the Advisory Council of a proposed federal undertaking with an adverse effect to historic properties, and invites the ACHP to consult in compliance with Section 106 of the National Historic Preservation Act. The attached documents include the completed e106 form and other project files for the proposed undertaking.

NPS appreciates ACHP's attention and consideration.

Best,
Megan

--

Megan Bailey, PhD
Cultural Resources Program Manager
George Washington Memorial Parkway
700 George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101
703.289.2509 (office)
202.438.6641 (cell)
megan_bailey@nps.gov

Caution: This email originated from outside of Stantec. Please take extra precaution.

Attention: Ce courriel provient de l'extérieur de Stantec. Veuillez prendre des précautions supplémentaires.

Atención: Este correo electrónico proviene de fuera de Stantec. Por favor, tome precauciones adicionales.



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

December 18, 2024

Dr. Wenonah G. Haire
Tribal Historic Preservation Officer
Catawba Nation
1536 Tom Steven Road
Rock Hill, South Carolina 29730

Re: Initiation of Section 106 Consultation, Clara Barton Parkway Cantilever and Bridge to Nowhere
Montgomery County, Maryland

Dear Dr. Haire:

The National Park Service (NPS) is proposing rehabilitation/replacement of the cantilever structure and adjacent retaining walls on Clara Barton Parkway. Additionally, NPS is considering demolition of an associated feature, the "bridge to nowhere". George Washington Memorial Parkway (GWMP), the NPS administrative unit responsible for the Clara Barton Parkway, understands the Catawba Nation to have interest in the preservation of Native American cultural resources of significance in this region and is writing to formally initiate consultation in compliance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800).

DESCRIPTION OF THE UNDERTAKING

Cantilever and Retaining Walls

The proposed project involves rehabilitation/replacement of 1,409 feet of a cantilever structure and 2,048 feet of adjacent retaining walls on the Clara Barton Parkway between Cabin John Parkway and the Macarthur Boulevard exit ramp (Figure 1). The cantilever structure and adjacent retaining walls are exhibiting widespread deterioration. Phase 1 of the project consisted of an in-depth study of the concrete slab and retaining walls, and determination of the levels of deterioration and future rehabilitation or reconstruction needs. Testing indicated that corrosion of the reinforcing steel has begun and is likely to worsen. A report, prepared by Clark Nexsen of the Federal Highway Administration (FHWA), concluded that the useful remaining service life of the structure is estimated to be approximately five years from completion of the study in November 2020. A subsequent inspection in October 2023 confirmed the timeline of the estimated remaining service life, and as such, the FHWA has recommended action be taken. Otherwise, widespread corrosion of the steel will reduce the load-carrying capacity of the cantilever structure and severely impact its structural integrity. If action is not taken, the NPS may be required to implement weight restrictions on the Clara Barton Parkway or completely close the inside northbound and southbound lanes to traffic for safety. This would cause substantial traffic impacts, as the Clara Barton Parkway is an essential thoroughfare in the area with approximately 40,000 daily users. As such, NPS is evaluating several alternatives to either rehabilitate or replace the cantilever structure and retaining walls. A preferred solution will be identified using value-based analyses, as well as public and

agency input during the Section 106 and National Environmental Policy Act (NEPA) compliance processes. Photographs of the cantilever structure from northbound and southbound Clara Barton Parkway are attached to this letter.

The Maryland segment of the Clara Barton Parkway was constructed between 1957 and 1965. Within the area of potential effect (APE), the terrain is so restrictive that designers used retaining walls and the cantilever structure to fit the Clara Barton Parkway between the Chesapeake and Ohio (C&O) Canal and the bluffs leading up to Glen Echo and Brookmont. Instead of panoramic views like the George Washington Memorial Parkway in Virginia, the Clara Barton Parkway focuses on internal views to historic structures of the C&O Canal and the Washington Aqueduct that represent the history of the landscape as an infrastructural corridor.

The cantilever structure and retaining walls are contributing resources to the Clara Barton Parkway as documented in the Clara Barton Parkway Cultural Landscape Inventory (CLI) prepared in 2015. According to the CLI, "The parkway has changed a little since its completion. The cantilever was re-engineered and rehabilitated in 1992, and the work is generally compatible with the historic design."

Bridge to Nowhere

The Glen Echo overpass, or "bridge to nowhere", was built in 1961 as part of the later abandoned plan to expand the Clara Barton Parkway to four travel lanes inbound into Washington, DC. As the parkway expansion never came to fruition, the structure has remained unused by traffic since its completion. The bridge to nowhere crosses over the northbound lane of the Clara Barton Parkway but is unconnected to the surrounding roadway network. The bridge is deteriorating and as such, the NPS is evaluating whether demolition is appropriate at this time based on the future risk and needs for rehabilitation that the structure is likely to require if left in place. If no action is taken, corrective measures would be required to maintain the structure and prevent the possible development of serious and costly problems in the future. Photographs of the bridge to nowhere from northbound Clara Barton Parkway and from the bridge deck are attached to this letter.

The bridge to nowhere is a contributing resource to the Clara Barton Parkway as documented in the Clara Barton Parkway CLI (2015). According to the CLI, "[The bridge] was similar in design to the Cabin John Creek Bridge with angled piers arcing into the concrete beams and steel guardrails, keeping it light and relatively delicate in appearance. Because it would have been more visible to motorists, it would have rivaled the Cabin John Creek Bridge as the most prominent example of the modern bridges of the parkway. As with the other bridges, the modernity of the engineering is contrasted with rustic rock, in this case a rock outcrop from which the bridge springs."

AREA OF POTENTIAL EFFECT

The NPS has developed a graphic illustration of the draft APE that is subject to modification through the consultation process and is attached as **Figure 2**. The NPS anticipates direct effects within the APE would be confined to the Clara Barton Parkway and location of the bridge to nowhere. The APE has been expanded to consider indirect effects to adjacent historic properties and to include the limited views of the bridge to nowhere.

HISTORIC STRUCTURES AND DISTRICTS

The draft APE overlaps with the boundaries of several historic properties, including the George Washington Memorial Parkway / Clara Barton Parkway (M: 35-61), Clara Barton National Historic Site (M: 35-25), Glen Echo Park Historic District (M: 35-41), and C&O Canal National Historical Park (NHP) (M: 12-46). The C&O Canal Lock #7 and Lock Keeper's House (M: 35-27) has not been evaluated for individual listing in the National Register but is a contributing resource to the C&O Canal NHP and is in the APE. The Carousel at Glen Echo Park (M: 35-39) and the Chautauqua Tower (M: 35-26) are

individually listed in the National Register and contribute to the significance of the Glen Echo Park Historic District. The Cabin John Aqueduct (M: 35-37) and the Washington Aqueduct (M: 29-49) are near, but not within, the draft APE. These historic properties are identified on the APE map provided as **Figure 2**.

There are five Maryland Inventory of Historic Properties (MIHP) resources that have not been evaluated for their National Register eligibility that are near, but not within, the APE. These include the Brookmont Trolley Right-of-Way (M: 35-31), Stonehaven (M: 35-44), Reading House (M: 35-24), Potomac Overlook (M: 35-157), and Inn at Glen Echo (M: 35-40).

Additionally, the Wilson Lane Trestle (M: 35-31-1), part of the Brookmont Trolley Line, has been determined eligible for listing in the National Register, but is not within the APE. The trestle is planned for demolition by the Washington Metropolitan Area Transit Authority (WMATA). Demolition is anticipated in 2025 or 2026.

ARCHEOLOGICAL RESOURCES

Two archeological surveys have been conducted within the APE, the most recent of which occurred almost 45 years ago.

Larrabee, Edward McMillan

1962 *A Survey of Historic and Prehistoric Archeological Sites Along the Chesapeake & Ohio Canal National Monument 1961-1962*. Contracting Archeologist. Report on file (No. MO 41), Maryland Historical Trust, Crownsville, Maryland.

In 1961-1962, a study was conducted along the entirety of the Chesapeake & Ohio Canal National Monument property from Cumberland to the Washington, DC boundary line (MHT Report No. MO 41). This study did not include Clara Barton Parkway itself, or the area that would become the parkway since it was under construction at the time. The survey mainly consisted of a map and literature review, informant interviews, and field survey consisting of pedestrian survey, surface collection, and minimal subsurface excavation. It is unclear from the reporting what methods were used within the current project APE and if any subsurface excavations were conducted.

Franklin, Katherine, and Sarah Gregory

1980 *Report on a Reconnaissance Archeological Survey of Park Service Property Affected By the Rock Run WSSC Alternate Points of Discharge*. National Park Service, Denver Service Center, National Capital Team. Report on file (No. MO 43), Maryland Historical Trust, Crownsville, Maryland.

The second survey was conducted in 1980 on NPS property along the Potomac River from Chain Bridge to 0.1-mile north of Brickyard Road, between Macarthur Boulevard and the Potomac River (MHT Report No. MO 43). This survey encompassed the APE. The survey consisted of map and literature review, surface reconnaissance, and limited controlled subsurface testing. However, no subsurface excavations were conducted in "Section 4" of the survey, which includes the APE. Regarding a proposed pumping station on the west side of Cabin John Creek between the northbound and southbound ramps of the Cabin John Parkway, just north of Clara Barton Parkway, the study recommended monitoring in this area. This was due to the potential to encounter the remains of various structures erected in the area during the mid-nineteenth-century construction of the Union Arch Bridge / Cabin John Aqueduct. These structures include boarding houses for laborers, saloons, and other similar buildings. The study theorized that the remains of some of these buildings could be located below or in the vicinity of the southbound lanes of the Cabin John Parkway under an unknown amount of fill.

The survey identified several other significant historic resources within the APE, including the Glen Echo Chautauqua site (Glen Echo Park; 18MO153) and the Clara Barton House (18MO154), both of which are adjacent to the Clara Barton Parkway to the northeast. It was noted that archaeological investigations of these sites had not yet been done, and none appear to have been conducted since; therefore, the extent of any intact subsurface remains associated with these sites is not known. The survey also identified the Washington and Great Falls Electric Railroad trolley-car line (18MO166) that ran just south of MacArthur Boulevard as a significant resource and noted that remains of rail-related infrastructure could be present. This resource is close to the Clara Barton Parkway only in the very southeastern extent of the APE. The survey identified Lock 7, located between the Clara Barton Parkway and the C&O Canal, as the most significant resource and recommended careful and close monitoring in its vicinity. It is not known whether subsequent monitoring occurred at any of these areas as no further reporting is available.

SECTION 106 CONSULTATION AND NEPA COORDINATION

In accordance with the Section 106 implementing regulations issued by the Advisory Council on Historic Preservation (36 CFR part 800; ACHP), NPS will coordinate Section 106 consultation and ensure the meaningful involvement of all consulting parties while assessing the effects of the proposed undertaking on historic properties within the APE. Later, continued consultation will strive for agreement on the determination of effect to historic properties and whether any potential adverse effects to historic properties might be avoided, minimized, or mitigated.

The NPS will prepare an Environmental Assessment (EA) to document the analysis of potential impacts of the proposed Clara Barton Parkway cantilever rehabilitation / replacement and potential bridge to nowhere demolition in accordance with the NEPA. The NPS plans to coordinate the Section 106 and NEPA processes per the implementing regulations (36 CFR § 800.8) of the NHPA. The NPS will also develop an Assessment of Effect (AOE) for the project as a separate, but parallel, process to NEPA compliance.

CONSULTING PARTIES

In accordance with 36 CFR Part 800.2(c), NPS identified parties that may be interested in the proposed Clara Barton Parkway cantilever rehabilitation / replacement and potential bridge to nowhere demolition and their effects on historic properties. The following organizations will be invited to participate as consulting parties:

Maryland Historical Trust	Chickahominy Indians Eastern Division
National Capital Planning Commission	Delaware Nation
NPS, C&O Canal NHP	Eastern Shawnee of Oklahoma
C&O Canal Trust	Monacan Indian Nation
C&O Canal Association	Nansemond Indian Tribe
Montgomery Planning – Historic Preservation Office	Pamunkey Indian Tribe
Heritage Montgomery	Rappahannock Tribe of Virginia
Montgomery History	Seneca Cayuga Nation
Montgomery Preservation	Shawnee Tribe
Preservation Maryland	Upper Mattaponi Indian Tribe
Glen Echo Park Partnership for Arts and Culture	Accohannock Indian Tribe
Catawba Nation	Piscataway Conoy
Chickahominy Indian Tribe	Piscataway Indian Tribe

We look forward to beginning the Section 106 consultation process for this project. If you have any questions or preliminary feedback related to the project, the draft APE, historic properties identified within the APE, the need for archeological assessment, or the list of consulting parties, please contact

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

Megan Bailey, Cultural Resources Program Manager for the George Washington Memorial Parkway, at
megan_bailey@nps.gov.

Sincerely,

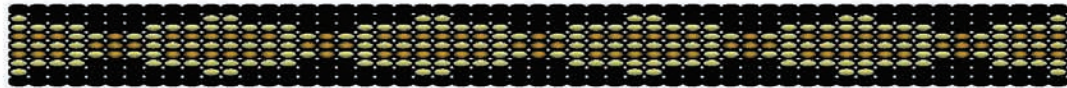
A handwritten signature in black ink, appearing to read "CSmith".

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway

The photos and figures on pages A-8 – A-10 were also sent with the tribal consultation letters in this appendix but have not been included to minimize the size of this report.

Catawba Indian Nation
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, South Carolina 29730

Office 803-328-2427
Fax 803-328-5791



January 21, 2025

Attention: Megan Bailey
USDI NPS
Turkey Run Park
McLean, VA 22101

Re. THPO #	TCNS #	Project Description
2025-384-8		Clara Barton Parkway Cantilever and Bridge to Nowhere, Montgomery Co., Maryland

Dear Ms. Bailey,

The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. **However, the Catawba are to be notified if Native American artifacts and / or human remains are located during the ground disturbance phase of this project.**

If you have questions please contact Caitlin Rogers at 803-328-2427 ext. 226, or e-mail Caitlin.Rogers@catawba.com.

Sincerely,

Wenonah G. Haire
Tribal Historic Preservation Officer



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

December 18, 2024

Wayne Adkins
First Assistant Chief/Chief Financial Officer
Chickahominy Indian Tribe
8200 Lott Cary Road
Providence Forge, Virginia 23140
wayne.adkins@chickahominytribe.org

Re: Initiation of Section 106 Consultation, Clara Barton Parkway Cantilever and Bridge to Nowhere
Montgomery County, Maryland

Dear Assistant Chief Adkins:

The National Park Service (NPS) is proposing rehabilitation/replacement of the cantilever structure and adjacent retaining walls on Clara Barton Parkway. Additionally, NPS is considering demolition of an associated feature, the “bridge to nowhere”. George Washington Memorial Parkway (GWMP), the NPS administrative unit responsible for the Clara Barton Parkway, understands the Chickahominy Indian Tribe to have interest in the preservation of Native American cultural resources of significance in this region and is writing to formally initiate consultation in compliance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800).

DESCRIPTION OF THE UNDERTAKING

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National Capital Planning Commission	Delaware Nation
NPS, C&O Canal NHP	Eastern Shawnee of Oklahoma
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C&O Canal Association	Nansemond Indian Tribe
Montgomery Planning – Historic Preservation Office	Pamunkey Indian Tribe
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Catawba Nation	Piscataway Conoy
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Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

Megan Bailey, Cultural Resources Program Manager for the George Washington Memorial Parkway, at
megan_bailey@nps.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "CSmith". The signature is written in a cursive, somewhat stylized font.

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

December 18, 2024

Candace Dickerson
Tribal Chair
Chickahominy Indian Eastern Division
2895 Mt. Pleasant Road
Providence Forge, Virginia 23140
consultations@cit-ed.org

Re: Initiation of Section 106 Consultation, Clara Barton Parkway Cantilever and Bridge to Nowhere
Montgomery County, Maryland

Dear Ms. Dickerson:

The National Park Service (NPS) is proposing rehabilitation/replacement of the cantilever structure and adjacent retaining walls on Clara Barton Parkway. Additionally, NPS is considering demolition of an associated feature, the “bridge to nowhere”. George Washington Memorial Parkway (GWMP), the NPS administrative unit responsible for the Clara Barton Parkway, understands the Chickahominy Indian Eastern Division to have interest in the preservation of Native American cultural resources of significance in this region and is writing to formally initiate consultation in compliance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800).

DESCRIPTION OF THE UNDERTAKING

Cantilever and Retaining Walls

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Bridge to Nowhere

The Glen Echo overpass, or “bridge to nowhere”, was built in 1961 as part of the later abandoned plan to expand the Clara Barton Parkway to four travel lanes inbound into Washington, DC. As the parkway expansion never came to fruition, the structure has remained unused by traffic since its completion. The bridge to nowhere crosses over the northbound lane of the Clara Barton Parkway but is unconnected to the surrounding roadway network. The bridge is deteriorating and as such, the NPS is evaluating whether demolition is appropriate at this time based on the future risk and needs for rehabilitation that the structure is likely to require if left in place. If no action is taken, corrective measures would be required to maintain the structure and prevent the possible development of serious and costly problems in the future. Photographs of the bridge to nowhere from northbound Clara Barton Parkway and from the bridge deck are attached to this letter.

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The draft APE overlaps with the boundaries of several historic properties, including the George Washington Memorial Parkway / Clara Barton Parkway (M: 35-61), Clara Barton National Historic Site (M: 35-25), Glen Echo Park Historic District (M: 35-41), and C&O Canal National Historical Park (NHP) (M: 12-46). The C&O Canal Lock #7 and Lock Keeper’s House (M: 35-27) has not been evaluated for individual listing in the National Register but is a contributing resource to the C&O Canal NHP and is in

the APE. The Carousel at Glen Echo Park (M: 35-39) and the Chautauqua Tower (M: 35-26) are individually listed in the National Register and contribute to the significance of the Glen Echo Park Historic District. The Cabin John Aqueduct (M: 35-37) and the Washington Aqueduct (M: 29-49) are near, but not within, the draft APE. These historic properties are identified on the APE map provided as **Figure 2**.

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SECTION 106 CONSULTATION AND NEPA COORDINATION

In accordance with the Section 106 implementing regulations issued by the Advisory Council on Historic Preservation (36 CFR part 800; ACHP), NPS will coordinate Section 106 consultation and ensure the meaningful involvement of all consulting parties while assessing the effects of the proposed undertaking on historic properties within the APE. Later, continued consultation will strive for agreement on the determination of effect to historic properties and whether any potential adverse effects to historic properties might be avoided, minimized, or mitigated.

The NPS will prepare an Environmental Assessment (EA) to document the analysis of potential impacts of the proposed Clara Barton Parkway cantilever rehabilitation / replacement and potential bridge to nowhere demolition in accordance with the NEPA. The NPS plans to coordinate the Section 106 and NEPA processes per the implementing regulations (36 CFR § 800.8) of the NHPA. The NPS will also develop an Assessment of Effect (AOE) for the project as a separate, but parallel, process to NEPA compliance.

CONSULTING PARTIES

In accordance with 36 CFR Part 800.2(c), NPS identified parties that may be interested in the proposed Clara Barton Parkway cantilever rehabilitation / replacement and potential bridge to nowhere demolition and their effects on historic properties. The following organizations will be invited to participate as consulting parties:

Maryland Historical Trust	Chickahominy Indians Eastern Division
National Capital Planning Commission	Delaware Nation
NPS, C&O Canal NHP	Eastern Shawnee of Oklahoma
C&O Canal Trust	Monacan Indian Nation
C&O Canal Association	Nansemond Indian Tribe
Montgomery Planning – Historic Preservation Office	Pamunkey Indian Tribe
Heritage Montgomery	Rappahannock Tribe of Virginia
Montgomery History	Seneca Cayuga Nation
Montgomery Preservation	Shawnee Tribe
Preservation Maryland	Upper Mattaponi Indian Tribe
Glen Echo Park Partnership for Arts and Culture	Accohannock Indian Tribe
Catawba Nation	Piscataway Conoy
Chickahominy Indian Tribe	Piscataway Indian Tribe

We look forward to beginning the Section 106 consultation process for this project. If you have any questions or preliminary feedback related to the project, the draft APE, historic properties identified within the APE, the need for archeological assessment, or the list of consulting parties, please contact

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

Megan Bailey, Cultural Resources Program Manager for the George Washington Memorial Parkway, at
megan_bailey@nps.gov.

Sincerely,

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

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



[EXTERNAL] Re: [EXTERNAL]Initiation of Section 106 Consultation, Clara Barton Parkway Cantilever and Bridge to Nowhere Montgomery County, Maryland

From Jessica Phillips <Jessica.Phillips@cit-ed.org>
 Date Mon 12/30/2024 2:13 PM
 To GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>
 Cc Bailey, Megan M <megan_bailey@nps.gov>; Joseph, Maureen <Maureen_Joseph@nps.gov>

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

Thank you for contacting us regarding the proposed project.

At this time, the Tribe does not wish to actively participate in this consultation project, because:

X	This project is outside our immediate ancestral territory
	The project’s impacts are anticipated to be minimal
	The project is more closely related to the [Tribe’s name] tribe, which may be participating in consultation
	The tribal office does not currently have the capacity to participate in this project
	Other: [list here]

However, the Tribe requests to be contacted if:

- Sites associated with local native history may be impacted by this project;
- Adverse effects to historic properties are identified in association with this project;
- Human remains **from any era** are encountered during this project;
- Unanticipated native cultural remains are encountered during this project;
- Other Virginia Tribes consulting on this project cease consultation; or
- The project size or scope becomes **larger or more potentially destructive** than currently described.

Please do not make any assumptions about future consultation interests based on this decision, as priorities and information may change. We request that you send any future consultation communications in electronic form to consultations@cit-ed.org. We appreciate your outreach to the Chickahominy Indian Tribe—Eastern Division and look forward to working with you in the future.

Blessings,

Jessica Phillips
 Tribal Environmental Director
 Tribal Consultations Point of Contact
 Chickahominy Indian Tribe - Eastern Division

2895 Mt. Pleasant Road
Providence Forge, VA 23140
P: 804-966-7815, Option 2
Jessica.Phillips@cit-ed.org

From: Torres, Karen E <karen_torres@nps.gov> on behalf of GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>
Sent: Wednesday, December 18, 2024 10:15 AM
To: Consultations <consultations@cit-ed.org>
Cc: Bailey, Megan M <megan_bailey@nps.gov>; Joseph, Maureen <Maureen_Joseph@nps.gov>
Subject: [EXTERNAL]Initiation of Section 106 Consultation, Clara Barton Parkway Cantilever and Bridge to Nowhere Montgomery County, Maryland

Dear Ms. Dickerson:

The National Park Service (NPS) is proposing rehabilitation/replacement of the cantilever structure and adjacent retaining walls on Clara Barton Parkway. Additionally, NPS is considering demolition of an associated feature, the "bridge to nowhere". George Washington Memorial Parkway (GWMP), the NPS administrative unit responsible for the Clara Barton Parkway, understands the Chickahominy Indian Eastern Division to have interest in the preservation of Native American cultural resources of significance in this region and is writing to formally initiate consultation in compliance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800).

Acting Superintendent
George Washington Memorial Parkway



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

December 18, 2024

Katelyn Lucas
Tribal Historic Preservation Officer
Delaware Nation
31064 SH 281
Anadarko, Oklahoma 73005
klucas@delawarenation-nsn.gov

Re: Initiation of Section 106 Consultation, Clara Barton Parkway Cantilever and Bridge to Nowhere
Montgomery County, Maryland

Dear Ms. Lucas:

The National Park Service (NPS) is proposing rehabilitation/replacement of the cantilever structure and adjacent retaining walls on Clara Barton Parkway. Additionally, NPS is considering demolition of an associated feature, the “bridge to nowhere”. George Washington Memorial Parkway (GWMP), the NPS administrative unit responsible for the Clara Barton Parkway, understands the Delaware Nation to have interest in the preservation of Native American cultural resources of significance in this region and is writing to formally initiate consultation in compliance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800).

DESCRIPTION OF THE UNDERTAKING

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Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

Megan Bailey, Cultural Resources Program Manager for the George Washington Memorial Parkway, at
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Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

December 18, 2024

Lora Nuckolls
Tribal Historic Preservation Officer
Eastern Shawnee of Oklahoma
70500 E. 128 Road
Wyandotte, Oklahoma 74370
lnuckolls@estoo.net

Re: Initiation of Section 106 Consultation, Clara Barton Parkway Cantilever and Bridge to Nowhere
Montgomery County, Maryland

Dear Ms. Nuckolls:

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SECTION 106 CONSULTATION AND NEPA COORDINATION

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CONSULTING PARTIES

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Maryland Historical Trust	Chickahominy Indians Eastern Division
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We look forward to beginning the Section 106 consultation process for this project. If you have any questions or preliminary feedback related to the project, the draft APE, historic properties identified within the APE, the need for archeological assessment, or the list of consulting parties, please contact

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

Megan Bailey, Cultural Resources Program Manager for the George Washington Memorial Parkway, at
megan_bailey@nps.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'CSmith', written in a cursive style.

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

December 18, 2024

Chief Diane Shields
Monacan Indian Nation
111 Highview Drive
Madison Heights, Virginia 24572
Chief@MonacanNation.gov

Re: Initiation of Section 106 Consultation, Clara Barton Parkway Cantilever and Bridge to Nowhere
Montgomery County, Maryland

Dear Chief Shields:

The National Park Service (NPS) is proposing rehabilitation/replacement of the cantilever structure and adjacent retaining walls on Clara Barton Parkway. Additionally, NPS is considering demolition of an associated feature, the “bridge to nowhere”. George Washington Memorial Parkway (GWMP), the NPS administrative unit responsible for the Clara Barton Parkway, understands the Monacan Indian Nation to have interest in the preservation of Native American cultural resources of significance in this region and is writing to formally initiate consultation in compliance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800).

DESCRIPTION OF THE UNDERTAKING

Cantilever and Retaining Walls

The proposed project involves rehabilitation/replacement of 1,409 feet of a cantilever structure and 2,048 feet of adjacent retaining walls on the Clara Barton Parkway between Cabin John Parkway and the MacArthur Boulevard exit ramp (Figure 1). The cantilever structure and adjacent retaining walls are exhibiting widespread deterioration. Phase 1 of the project consisted of an in-depth study of the concrete slab and retaining walls, and determination of the levels of deterioration and future rehabilitation or reconstruction needs. Testing indicated that corrosion of the reinforcing steel has begun and is likely to worsen. A report, prepared by Clark Nexsen of the Federal Highway Administration (FHWA), concluded that the useful remaining service life of the structure is estimated to be approximately five years from completion of the study in November 2020. A subsequent inspection in October 2023 confirmed the timeline of the estimated remaining service life, and as such, the FHWA has recommended action be taken. Otherwise, widespread corrosion of the steel will reduce the load-carrying capacity of the cantilever structure and severely impact its structural integrity. If action is not taken, the NPS may be required to implement weight restrictions on the Clara Barton Parkway or completely close the inside northbound and southbound lanes to traffic for safety. This would cause substantial traffic impacts, as the Clara Barton Parkway is an essential thoroughfare in the area with approximately 40,000 daily users. As such, NPS is evaluating several alternatives to either rehabilitate or replace the cantilever structure and retaining walls. A preferred solution will be identified using value-based analyses, as well as public and

agency input during the Section 106 and National Environmental Policy Act (NEPA) compliance processes. Photographs of the cantilever structure from northbound and southbound Clara Barton Parkway are attached to this letter.

The Maryland segment of the Clara Barton Parkway was constructed between 1957 and 1965. Within the area of potential effect (APE), the terrain is so restrictive that designers used retaining walls and the cantilever structure to fit the Clara Barton Parkway between the Chesapeake and Ohio (C&O) Canal and the bluffs leading up to Glen Echo and Brookmont. Instead of panoramic views like the George Washington Memorial Parkway in Virginia, the Clara Barton Parkway focuses on internal views to historic structures of the C&O Canal and the Washington Aqueduct that represent the history of the landscape as an infrastructural corridor.

The cantilever structure and retaining walls are contributing resources to the Clara Barton Parkway as documented in the Clara Barton Parkway Cultural Landscape Inventory (CLI) prepared in 2015.

According to the CLI, “The parkway has changed a little since its completion. The cantilever was re-engineered and rehabilitated in 1992, and the work is generally compatible with the historic design.”

Bridge to Nowhere

The Glen Echo overpass, or “bridge to nowhere”, was built in 1961 as part of the later abandoned plan to expand the Clara Barton Parkway to four travel lanes inbound into Washington, DC. As the parkway expansion never came to fruition, the structure has remained unused by traffic since its completion. The bridge to nowhere crosses over the northbound lane of the Clara Barton Parkway but is unconnected to the surrounding roadway network. The bridge is deteriorating and as such, the NPS is evaluating whether demolition is appropriate at this time based on the future risk and needs for rehabilitation that the structure is likely to require if left in place. If no action is taken, corrective measures would be required to maintain the structure and prevent the possible development of serious and costly problems in the future. Photographs of the bridge to nowhere from northbound Clara Barton Parkway and from the bridge deck are attached to this letter.

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Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

Megan Bailey, Cultural Resources Program Manager for the George Washington Memorial Parkway, at
megan_bailey@nps.gov.

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Christine Smith, Superintendent (Acting)
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United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

December 18, 2024

Chief Keith Anderson
Nansemond Indian Tribe
1001 Pembroke Lane
Suffolk, Virginia 24572
Chief@Nansemond.gov

CC: Dr. Ellen Chapman, Tribal Legal Counsel, ellen@culturalheritagepartners.com

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Catawba Nation	Piscataway Conoy
Chickahominy Indian Tribe	Piscataway Indian Tribe


We look forward to beginning the Section 106 consultation process for this project. If you have any questions or preliminary feedback related to the project, the draft APE, historic properties identified within the APE, the need for archeological assessment, or the list of consulting parties, please contact

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

Megan Bailey, Cultural Resources Program Manager for the George Washington Memorial Parkway, at
megan_bailey@nps.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "CSmith". The signature is stylized and cursive.

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

December 18, 2024

Chief Robert Gray
Pamunkey Indian Tribe
1054 Pocahontas Trail
King William, Virginia 23086
robert.gray@pamunkey.org

Re: Initiation of Section 106 Consultation, Clara Barton Parkway Cantilever and Bridge to Nowhere
Montgomery County, Maryland

Dear Chief Gray:

The National Park Service (NPS) is proposing rehabilitation/replacement of the cantilever structure and adjacent retaining walls on Clara Barton Parkway. Additionally, NPS is considering demolition of an associated feature, the “bridge to nowhere”. George Washington Memorial Parkway (GWMP), the NPS administrative unit responsible for the Clara Barton Parkway, understands the Pamunkey Indian Tribe to have interest in the preservation of Native American cultural resources of significance in this region and is writing to formally initiate consultation in compliance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800).

DESCRIPTION OF THE UNDERTAKING

Cantilever and Retaining Walls

The proposed project involves rehabilitation/replacement of 1,409 feet of a cantilever structure and 2,048 feet of adjacent retaining walls on the Clara Barton Parkway between Cabin John Parkway and the Macarthur Boulevard exit ramp (Figure 1). The cantilever structure and adjacent retaining walls are exhibiting widespread deterioration. Phase 1 of the project consisted of an in-depth study of the concrete slab and retaining walls, and determination of the levels of deterioration and future rehabilitation or reconstruction needs. Testing indicated that corrosion of the reinforcing steel has begun and is likely to worsen. A report, prepared by Clark Nexsen of the Federal Highway Administration (FHWA), concluded that the useful remaining service life of the structure is estimated to be approximately five years from completion of the study in November 2020. A subsequent inspection in October 2023 confirmed the timeline of the estimated remaining service life, and as such, the FHWA has recommended action be taken. Otherwise, widespread corrosion of the steel will reduce the load-carrying capacity of the cantilever structure and severely impact its structural integrity. If action is not taken, the NPS may be required to implement weight restrictions on the Clara Barton Parkway or completely close the inside northbound and southbound lanes to traffic for safety. This would cause substantial traffic impacts, as the Clara Barton Parkway is an essential thoroughfare in the area with approximately 40,000 daily users. As such, NPS is evaluating several alternatives to either rehabilitate or replace the cantilever structure and retaining walls. A preferred solution will be identified using value-based analyses, as well as public and agency input during the Section 106 and National Environmental Policy Act (NEPA) compliance

processes. Photographs of the cantilever structure from northbound and southbound Clara Barton Parkway are attached to this letter.

The Maryland segment of the Clara Barton Parkway was constructed between 1957 and 1965. Within the area of potential effect (APE), the terrain is so restrictive that designers used retaining walls and the cantilever structure to fit the Clara Barton Parkway between the Chesapeake and Ohio (C&O) Canal and the bluffs leading up to Glen Echo and Brookmont. Instead of panoramic views like the George Washington Memorial Parkway in Virginia, the Clara Barton Parkway focuses on internal views to historic structures of the C&O Canal and the Washington Aqueduct that represent the history of the landscape as an infrastructural corridor.

The cantilever structure and retaining walls are contributing resources to the Clara Barton Parkway as documented in the Clara Barton Parkway Cultural Landscape Inventory (CLI) prepared in 2015. According to the CLI, "The parkway has changed a little since its completion. The cantilever was re-engineered and rehabilitated in 1992, and the work is generally compatible with the historic design."

Bridge to Nowhere

The Glen Echo overpass, or "bridge to nowhere", was built in 1961 as part of the later abandoned plan to expand the Clara Barton Parkway to four travel lanes inbound into Washington, DC. As the parkway expansion never came to fruition, the structure has remained unused by traffic since its completion. The bridge to nowhere crosses over the northbound lane of the Clara Barton Parkway but is unconnected to the surrounding roadway network. The bridge is deteriorating and as such, the NPS is evaluating whether demolition is appropriate at this time based on the future risk and needs for rehabilitation that the structure is likely to require if left in place. If no action is taken, corrective measures would be required to maintain the structure and prevent the possible development of serious and costly problems in the future. Photographs of the bridge to nowhere from northbound Clara Barton Parkway and from the bridge deck are attached to this letter.

The bridge to nowhere is a contributing resource to the Clara Barton Parkway as documented in the Clara Barton Parkway CLI (2015). According to the CLI, "[The bridge] was similar in design to the Cabin John Creek Bridge with angled piers arcing into the concrete beams and steel guardrails, keeping it light and relatively delicate in appearance. Because it would have been more visible to motorists, it would have rivaled the Cabin John Creek Bridge as the most prominent example of the modern bridges of the parkway. As with the other bridges, the modernity of the engineering is contrasted with rustic rock, in this case a rock outcrop from which the bridge springs."

AREA OF POTENTIAL EFFECT

The NPS has developed a graphic illustration of the draft APE that is subject to modification through the consultation process and is attached as **Figure 2**. The NPS anticipates direct effects within the APE would be confined to the Clara Barton Parkway and location of the bridge to nowhere. The APE has been expanded to consider indirect effects to adjacent historic properties and to include the limited views of the bridge to nowhere.

HISTORIC STRUCTURES AND DISTRICTS

The draft APE overlaps with the boundaries of several historic properties, including the George Washington Memorial Parkway / Clara Barton Parkway (M: 35-61), Clara Barton National Historic Site (M: 35-25), Glen Echo Park Historic District (M: 35-41), and C&O Canal National Historical Park (NHP) (M: 12-46). The C&O Canal Lock #7 and Lock Keeper's House (M: 35-27) has not been evaluated for individual listing in the National Register but is a contributing resource to the C&O Canal NHP and is in the APE. The Carousel at Glen Echo Park (M: 35-39) and the Chautauqua Tower (M: 35-26) are individually listed in the National Register and contribute to the significance of the Glen Echo Park

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Additionally, the Wilson Lane Trestle (M: 35-31-1), part of the Brookmont Trolley Line, has been determined eligible for listing in the National Register, but is not within the APE. The trestle is planned for demolition by the Washington Metropolitan Area Transit Authority (WMATA). Demolition is anticipated in 2025 or 2026.

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Two archeological surveys have been conducted within the APE, the most recent of which occurred almost 45 years ago.

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Franklin, Katherine, and Sarah Gregory

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The survey identified several other significant historic resources within the APE, including the Glen Echo Chautauqua site (Glen Echo Park; 18MO153) and the Clara Barton House (18MO154), both of which are adjacent to the Clara Barton Parkway to the northeast. It was noted that archaeological investigations of these sites had not yet been done, and none appear to have been conducted since; therefore, the extent of any intact subsurface remains associated with these sites is not known. The survey also identified the Washington and Great Falls Electric Railroad trolley-car line (18MO166) that ran just south of MacArthur Boulevard as a significant resource and noted that remains of rail-related infrastructure could be present. This resource is close to the Clara Barton Parkway only in the very southeastern extent of the APE. The survey identified Lock 7, located between the Clara Barton Parkway and the C&O Canal, as the most significant resource and recommended careful and close monitoring in its vicinity. It is not known whether subsequent monitoring occurred at any of these areas as no further reporting is available.

SECTION 106 CONSULTATION AND NEPA COORDINATION

In accordance with the Section 106 implementing regulations issued by the Advisory Council on Historic Preservation (36 CFR part 800; ACHP), NPS will coordinate Section 106 consultation and ensure the meaningful involvement of all consulting parties while assessing the effects of the proposed undertaking on historic properties within the APE. Later, continued consultation will strive for agreement on the determination of effect to historic properties and whether any potential adverse effects to historic properties might be avoided, minimized, or mitigated.

The NPS will prepare an Environmental Assessment (EA) to document the analysis of potential impacts of the proposed Clara Barton Parkway cantilever rehabilitation / replacement and potential bridge to nowhere demolition in accordance with the NEPA. The NPS plans to coordinate the Section 106 and NEPA processes per the implementing regulations (36 CFR § 800.8) of the NHPA. The NPS will also develop an Assessment of Effect (AOE) for the project as a separate, but parallel, process to NEPA compliance.

CONSULTING PARTIES

In accordance with 36 CFR Part 800.2(c), NPS identified parties that may be interested in the proposed Clara Barton Parkway cantilever rehabilitation / replacement and potential bridge to nowhere demolition and their effects on historic properties. The following organizations will be invited to participate as consulting parties:

Maryland Historical Trust	Chickahominy Indians Eastern Division
National Capital Planning Commission	Delaware Nation
NPS, C&O Canal NHP	Eastern Shawnee of Oklahoma
C&O Canal Trust	Monacan Indian Nation
C&O Canal Association	Nansemond Indian Tribe
Montgomery Planning – Historic Preservation Office	Pamunkey Indian Tribe
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We look forward to beginning the Section 106 consultation process for this project. If you have any questions or preliminary feedback related to the project, the draft APE, historic properties identified within the APE, the need for archeological assessment, or the list of consulting parties, please contact

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

Megan Bailey, Cultural Resources Program Manager for the George Washington Memorial Parkway, at
megan_bailey@nps.gov.

Sincerely,

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Christine Smith, Superintendent (Acting)
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United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

December 18, 2024

Chief Anne Richardson
Rappahannock Tribe of Virginia
5036 Indian Neck Road
Indian Neck, Virginia 23148
arichardson@rappahannocktribe.org

CC: Marion Werkheiser, marion@culturalheritagepartners.com

Re: Initiation of Section 106 Consultation, Clara Barton Parkway Cantilever and Bridge to Nowhere
Montgomery County, Maryland

Dear Chief Anne Richardson :

The National Park Service (NPS) is proposing rehabilitation/replacement of the cantilever structure and adjacent retaining walls on Clara Barton Parkway. Additionally, NPS is considering demolition of an associated feature, the “bridge to nowhere”. George Washington Memorial Parkway (GWMP), the NPS administrative unit responsible for the Clara Barton Parkway, understands the Rappahannock Tribe of Virginia to have interest in the preservation of Native American cultural resources of significance in this region and is writing to formally initiate consultation in compliance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800).

DESCRIPTION OF THE UNDERTAKING

Cantilever and Retaining Walls

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Clara Barton Parkway Cantilever and Bridge to Nowhere

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Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

December 18, 2024

William Tarrant
Tribal Historic Preservation Officer
Seneca Cayuga Nation
PO Box 453220
Grove, Oklahoma 74344
wtarrant@sctribe.com

Re: Initiation of Section 106 Consultation, Clara Barton Parkway Cantilever and Bridge to Nowhere
Montgomery County, Maryland

Dear Mr. Tarrant:

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The NPS will prepare an Environmental Assessment (EA) to document the analysis of potential impacts of the proposed Clara Barton Parkway cantilever rehabilitation / replacement and potential bridge to nowhere demolition in accordance with the NEPA. The NPS plans to coordinate the Section 106 and NEPA processes per the implementing regulations (36 CFR § 800.8) of the NHPA. The NPS will also develop an Assessment of Effect (AOE) for the project as a separate, but parallel, process to NEPA compliance.

CONSULTING PARTIES

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We look forward to beginning the Section 106 consultation process for this project. If you have any questions or preliminary feedback related to the project, the draft APE, historic properties identified within the APE, the need for archeological assessment, or the list of consulting parties, please contact

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

Megan Bailey, Cultural Resources Program Manager for the George Washington Memorial Parkway, at
megan_bailey@nps.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "CSmith". The letters are cursive and somewhat stylized.

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

December 18, 2024

Tonya Tipton
Tribal Historic Preservation Officer
Shawnee Tribe
29 South Highway 69 A
Miami, Oklahoma 74354
tonya@shawnee-tribe.com

Re: Initiation of Section 106 Consultation, Clara Barton Parkway Cantilever and Bridge to Nowhere
Montgomery County, Maryland

Dear Ms. Tipton:

The National Park Service (NPS) is proposing rehabilitation/replacement of the cantilever structure and adjacent retaining walls on Clara Barton Parkway. Additionally, NPS is considering demolition of an associated feature, the “bridge to nowhere”. George Washington Memorial Parkway (GWMP), the NPS administrative unit responsible for the Clara Barton Parkway, understands the Shawnee Tribe to have interest in the preservation of Native American cultural resources of significance in this region and is writing to formally initiate consultation in compliance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800).

DESCRIPTION OF THE UNDERTAKING

Cantilever and Retaining Walls

The proposed project involves rehabilitation/replacement of 1,409 feet of a cantilever structure and 2,048 feet of adjacent retaining walls on the Clara Barton Parkway between Cabin John Parkway and the Macarthur Boulevard exit ramp (Figure 1). The cantilever structure and adjacent retaining walls are exhibiting widespread deterioration. Phase 1 of the project consisted of an in-depth study of the concrete slab and retaining walls, and determination of the levels of deterioration and future rehabilitation or reconstruction needs. Testing indicated that corrosion of the reinforcing steel has begun and is likely to worsen. A report, prepared by Clark Nexsen of the Federal Highway Administration (FHWA), concluded that the useful remaining service life of the structure is estimated to be approximately five years from completion of the study in November 2020. A subsequent inspection in October 2023 confirmed the timeline of the estimated remaining service life, and as such, the FHWA has recommended action be taken. Otherwise, widespread corrosion of the steel will reduce the load-carrying capacity of the cantilever structure and severely impact its structural integrity. If action is not taken, the NPS may be required to implement weight restrictions on the Clara Barton Parkway or completely close the inside northbound and southbound lanes to traffic for safety. This would cause substantial traffic impacts, as the Clara Barton Parkway is an essential thoroughfare in the area with approximately 40,000 daily users. As such, NPS is evaluating several alternatives to either rehabilitate or replace the cantilever structure and retaining walls. A preferred solution will be identified using value-based analyses, as well as public and

agency input during the Section 106 and National Environmental Policy Act (NEPA) compliance processes. Photographs of the cantilever structure from northbound and southbound Clara Barton Parkway are attached to this letter.

The Maryland segment of the Clara Barton Parkway was constructed between 1957 and 1965. Within the area of potential effect (APE), the terrain is so restrictive that designers used retaining walls and the cantilever structure to fit the Clara Barton Parkway between the Chesapeake and Ohio (C&O) Canal and the bluffs leading up to Glen Echo and Brookmont. Instead of panoramic views like the George Washington Memorial Parkway in Virginia, the Clara Barton Parkway focuses on internal views to historic structures of the C&O Canal and the Washington Aqueduct that represent the history of the landscape as an infrastructural corridor.

The cantilever structure and retaining walls are contributing resources to the Clara Barton Parkway as documented in the Clara Barton Parkway Cultural Landscape Inventory (CLI) prepared in 2015.

According to the CLI, “The parkway has changed a little since its completion. The cantilever was re-engineered and rehabilitated in 1992, and the work is generally compatible with the historic design.”

Bridge to Nowhere

The Glen Echo overpass, or “bridge to nowhere”, was built in 1961 as part of the later abandoned plan to expand the Clara Barton Parkway to four travel lanes inbound into Washington, DC. As the parkway expansion never came to fruition, the structure has remained unused by traffic since its completion. The bridge to nowhere crosses over the northbound lane of the Clara Barton Parkway but is unconnected to the surrounding roadway network. The bridge is deteriorating and as such, the NPS is evaluating whether demolition is appropriate at this time based on the future risk and needs for rehabilitation that the structure is likely to require if left in place. If no action is taken, corrective measures would be required to maintain the structure and prevent the possible development of serious and costly problems in the future. Photographs of the bridge to nowhere from northbound Clara Barton Parkway and from the bridge deck are attached to this letter.

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AREA OF POTENTIAL EFFECT

The NPS has developed a graphic illustration of the draft APE that is subject to modification through the consultation process and is attached as **Figure 2**. The NPS anticipates direct effects within the APE would be confined to the Clara Barton Parkway and location of the bridge to nowhere. The APE has been expanded to consider indirect effects to adjacent historic properties and to include the limited views of the bridge to nowhere.

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Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

Megan Bailey, Cultural Resources Program Manager for the George Washington Memorial Parkway, at
megan_bailey@nps.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "CSmith". The signature is written in a cursive, somewhat stylized font.

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway

Schrader, Brett

From: Joseph, Maureen <Maureen_Joseph@nps.gov>
Sent: Tuesday, February 25, 2025 7:51 AM
To: Hammig, Laurel D; Schrader, Brett
Cc: Bailey, Megan M
Subject: Fw: [EXTERNAL] Section 106 Consultation - Clara Barton Parkway Cantilever and Bridge to Nowhere

Shawnee Tribe will not be participating in the Section 106 consultation for this project. I put a note on the shared invitation list and strikeout the Shawnee Tribe contact information. Email notice to the Agencies should be going out today.

Maureen

Maureen Joseph, ASLA (she/her)
Resource Management Division Manager
National Park Service - George Washington Memorial Parkway [Link](#)
700 George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

703.289.2512 (office)
202.734.0932 (cell)
maureen_joseph@nps.gov

I'm a *proud* graduate of the GOAL Leadership Academy. [Ask me about the program!](#)

From: Torres, Karen E <karen_torres@nps.gov> on behalf of GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>
Sent: Tuesday, February 11, 2025 3:50 PM
To: Joseph, Maureen <Maureen_Joseph@nps.gov>; Bailey, Megan M <megan_bailey@nps.gov>
Subject: Fw: [EXTERNAL] Section 106 Consultation - Clara Barton Parkway Cantilever and Bridge to Nowhere

Superintendent
George Washington Memorial Parkway

From: Laserfiche Notification <donotreply@laserfiche.com>
Sent: Tuesday, February 11, 2025 3:07 PM
To: GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>
Subject: [EXTERNAL] Section 106 Consultation - Clara Barton Parkway Cantilever and Bridge to Nowhere

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

This email is in response to Clara Barton Parkway Cantilever and Bridge to Nowhere. The project is out of the Shawnee Tribe's area of interest. If you have any questions, you may contact me via email at Section106@shawnee-tribe.com.

Thank you for giving us the opportunity to comment on this project.

Sincerely,



Erin Paden

TRIBAL HISTORIC PRESERVATION

SPECIALIST

Office: (918) 542-2441, x140

Email: epaden@shawnee-tribe.com

29 S Hwy 69A

Miami, OK 74354

shawnee-tribe.com

Caution: This email originated from outside of Stantec. Please take extra precaution.

Attention: Ce courriel provient de l'extérieur de Stantec. Veuillez prendre des précautions supplémentaires.

Atención: Este correo electrónico proviene de fuera de Stantec. Por favor, tome precauciones adicionales.



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

December 18, 2024

Chief W. Frank Adams
Upper Mattaponi Indian Tribe
13476 King William Road
King William, Virginia 23086
info@umitribe.org

Re: Initiation of Section 106 Consultation, Clara Barton Parkway Cantilever and Bridge to Nowhere
Montgomery County, Maryland

Dear Chief Adams:

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1980 *Report on a Reconnaissance Archeological Survey of Park Service Property Affected By the Rock Run WSSC Alternate Points of Discharge*. National Park Service, Denver Service Center, National Capital Team. Report on file (No. MO 43), Maryland Historical Trust, Crownsville, Maryland.

The second survey was conducted in 1980 on NPS property along the Potomac River from Chain Bridge to 0.1-mile north of Brickyard Road, between Macarthur Boulevard and the Potomac River (MHT Report No. MO 43). This survey encompassed the APE. The survey consisted of map and literature review, surface reconnaissance, and limited controlled subsurface testing. However, no subsurface excavations were conducted in **“Section 4” of the survey, which includes the APE**. Regarding a proposed pumping station on the west side of Cabin John Creek between the northbound and southbound ramps of the Cabin John Parkway, just north of Clara Barton Parkway, the study recommended monitoring in this area. This was due to the potential to encounter the remains of various structures erected in the area during the mid-nineteenth-century construction of the Union Arch Bridge / Cabin John Aqueduct. These structures include boarding houses for laborers, saloons, and other similar buildings. The study theorized that the remains of some of these buildings could be located below or in the vicinity of the southbound lanes of the Cabin John Parkway under an unknown amount of fill.

The survey identified several other significant historic resources within the APE, including the Glen Echo Chautauqua site (Glen Echo Park; 18MO153) and the Clara Barton House (18MO154), both of which are adjacent to the Clara Barton Parkway to the northeast. It was noted that archaeological investigations of these sites had not yet been done, and none appear to have been conducted since; therefore, the extent of any intact subsurface remains associated with these sites is not known. The survey also identified the Washington and Great Falls Electric Railroad trolley-car line (18MO166) that ran just south of MacArthur Boulevard as a significant resource and noted that remains of rail-related infrastructure could be present. This resource is close to the Clara Barton Parkway only in the very southeastern extent of the APE. The survey identified Lock 7, located between the Clara Barton Parkway and the C&O Canal, as the most significant resource and recommended careful and close monitoring in its vicinity. It is not known whether subsequent monitoring occurred at any of these areas as no further reporting is available.

SECTION 106 CONSULTATION AND NEPA COORDINATION

In accordance with the Section 106 implementing regulations issued by the Advisory Council on Historic Preservation (36 CFR part 800; ACHP), NPS will coordinate Section 106 consultation and ensure the meaningful involvement of all consulting parties while assessing the effects of the proposed undertaking on historic properties within the APE. Later, continued consultation will strive for agreement on the determination of effect to historic properties and whether any potential adverse effects to historic properties might be avoided, minimized, or mitigated.

The NPS will prepare an Environmental Assessment (EA) to document the analysis of potential impacts of the proposed Clara Barton Parkway cantilever rehabilitation / replacement and potential bridge to nowhere demolition in accordance with the NEPA. The NPS plans to coordinate the Section 106 and NEPA processes per the implementing regulations (36 CFR § 800.8) of the NHPA. The NPS will also develop an Assessment of Effect (AOE) for the project as a separate, but parallel, process to NEPA compliance.

CONSULTING PARTIES

In accordance with 36 CFR Part 800.2(c), NPS identified parties that may be interested in the proposed Clara Barton Parkway cantilever rehabilitation / replacement and potential bridge to nowhere demolition and their effects on historic properties. The following organizations will be invited to participate as consulting parties:

Maryland Historical Trust	Chickahominy Indians Eastern Division
National Capital Planning Commission	Delaware Nation
NPS, C&O Canal NHP	Eastern Shawnee of Oklahoma
C&O Canal Trust	Monacan Indian Nation
C&O Canal Association	Nansemond Indian Tribe
Montgomery Planning – Historic Preservation Office	Pamunkey Indian Tribe
Heritage Montgomery	Rappahannock Tribe of Virginia
Montgomery History	Seneca Cayuga Nation
Montgomery Preservation	Shawnee Tribe
Preservation Maryland	Upper Mattaponi Indian Tribe
Glen Echo Park Partnership for Arts and Culture	Accohannock Indian Tribe
Catawba Nation	Piscataway Conoy
Chickahominy Indian Tribe	Piscataway Indian Tribe

We look forward to beginning the Section 106 consultation process for this project. If you have any questions or preliminary feedback related to the project, the draft APE, historic properties identified within the APE, the need for archeological assessment, or the list of consulting parties, please contact

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

Megan Bailey, Cultural Resources Program Manager for the George Washington Memorial Parkway, at
megan_bailey@nps.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "CSmith". The signature is stylized and cursive.

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Chesapeake Bay Ecological Services Field Office
177 Admiral Cochrane Drive
Annapolis, MD 21401-7307
Phone: (410) 573-4599 Fax: (410) 266-9127



In Reply Refer To:

04/09/2025 14:28:21 UTC

Project Code: 2025-0080745

Project Name: Clara Barton Parkway Cantilever Rehabilitation / Replacement and Glen Echo Overpass Demolition

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed, and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(b)(1) and 7(b)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2))

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Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Chesapeake Bay Ecological Services Field Office
177 Admiral Cochrane Drive
Annapolis, MD 21401-7307
(410) 573-4599

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PROJECT SUMMARY

Project Code: 2025-0080745

Project Name: Clara Barton Parkway Cantilever Rehabilitation / Replacement and Glen Echo Overpass Demolition

Project Type: Road/Hwy - Maintenance/Modification

Project Description: The National Park Service (NPS) is conducting planning activities for the Clara Barton Parkway Cantilever and Glen Echo Overpass Environmental Assessment (EA). The project would rehabilitate or replace the 1,409-foot cantilever structure and 2,048 feet of adjacent retaining walls on Clara Barton Parkway between Cabin John Parkway and the Macarthur Boulevard exit ramp in Montgomery County, Maryland. The project would also include demolition of an associated feature, the Glen Echo Overpass.

The cantilever structure and associated retaining walls have not been rehabilitated since 1992. As such, an in-depth study of the concrete cantilever slab and adjacent retaining walls was conducted in 2020 by the Federal Highway Administration (FHWA) to determine the level of deterioration and future rehabilitation or reconstruction needs. Testing indicated that the cantilever structure and retaining walls are exhibiting widespread deterioration. Corrosion of the reinforcing steel has begun and is likely to worsen. FHWA estimated the useful remaining service life of the structure was approximately five years from completion of the study. A subsequent inspection in October 2023 confirmed the timeline of the estimated remaining service life, and as such, FHWA has recommended action be taken. Otherwise, widespread corrosion of the steel will reduce the load-carrying capacity of the cantilever structure and severely impact its structural integrity. If action is not taken, the NPS may be required to implement weight restrictions on the Clara Barton Parkway or completely close the inside northbound and southbound lanes to traffic for safety because of the potential for falling concrete debris. This would cause substantial traffic impacts, as the Clara Barton Parkway is an essential thoroughfare in the area with approximately 40,000 daily users.

The FHWA conducted a routine inspection of the Glen Echo Overpass in April 2023 that identified issues with bridge safety railings, accumulation of debris that is inhibiting proper drainage, encroaching tree growth, concrete spalling with exposed rebar, loose rock adjacent to pier columns, and erosion of the embankment in front of the south abutment and south pier columns. The FHWA recommended corrective actions, and as such, the NPS is evaluating whether demolition is appropriate because the bridge is likely to require costly rehabilitation if left in place. Demolishing the bridge during the same construction mobilization as the

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cantilever reconstruction would be most cost effective and would consolidate construction-related traffic impacts.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@38.9669329,-77.14135846065027,14z>



Counties: Montgomery County, Maryland

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ENDANGERED SPECIES ACT SPECIES

There is a total of 3 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

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MAMMALS

NAME	STATUS
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

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RIVERINE

- R5UBH

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IPAC USER CONTACT INFORMATION

Agency: National Park Service
Name: Brett Schrader
Address: 810 Glen Eagles Court, Suite 300
City: Baltimore
State: MD
Zip: 21286
Email: brett.schrader@stantec.com
Phone: 4434256859



Wes Moore, Governor
Aruna Miller, Lt. Governor
Josh Kurtz, Secretary
David Goshorn, Deputy Secretary

March 24, 2024

Ms. Jennifer Madello
Superintendent
700 George Washington Memorial Parkway
McLean, VA 22101

RE: Environmental Review for Clara Barton Cantilever, Montgomery County, Maryland

Dear Ms. Madello:

The Wildlife and Heritage Service has no official records for State or Federal listed, candidate, proposed, or rare plant or animal species within the project area shown on the map provided. As a result, we have no specific concerns regarding potential impacts to such species or recommendations for protection measures at this time. If the project changes in the future such that the limits of proposed disturbance or overall site boundaries are modified, please provide us with revised project maps and we will provide you with an updated evaluation.

Thank you for allowing us the opportunity to review this project. If you should have any further questions regarding this information, please contact me at lori.byrne@maryland.gov or at (410) 260-8573.

Sincerely,

A handwritten signature in black ink that reads "Lori A. Byrne".

Lori A. Byrne,
Environmental Review Coordinator
Wildlife and Heritage Service
MD Dept. of Natural Resources

ER# 2025.0587.mo