

## **APPENDIX A**

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### **AGENCY CORRESPONDENCE**

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## VIRGINIA DEPARTMENT OF HISTORIC RESOURCES



IN REPLY REFER TO:

### United States Department of the Interior

NATIONAL PARK SERVICE  
National Capital Region  
1100 Ohio Drive, S.W.  
Washington, D.C. 20242

#### 1.A.1 (NCR-WRAP)

August 9, 2016

Ethel Eaton  
DHR Headquarters, Richmond Central Office  
2801 Kensington Avenue  
Richmond, VA 23221  
ethel.eaton@dhr.virginia.gov

Dear Ms. Eaton:

The National Park Service (NPS) is preparing a Wetlands Restoration Action Plan (WRAP), to show efforts being made to enhance the larger Chesapeake Bay watershed. The project will help park managers understand steps that can be taken to meet the larger objective to track “functional gains” on wetlands and floodplains. The WRAP will outline plans that parks can implement to contribute to Chesapeake Bay Watershed protection. The potential impacts of implementing the plan will be identified and analyzed through an environmental assessment pursuant to the National Environmental Policy Act (NEPA). Additional NEPA analysis and National Historic Preservation Act (NHPA) consultation will be required at the time of site-specific action implementation. The NPS intends to prepare a programmatic agreement per 36 CFR 800.4(2) for the WRAP.

Four parks in the National Capital Region (NCR) will participate in this project and lie within the Chesapeake Bay Watershed. The four parks include:

- C&O Canal National Historical Park (CHOH) traverses 184.5 miles across the Chesapeake Bay watershed, going from the most rural to the most developed areas in the District of Columbia and the states of Maryland and West Virginia.
- Monocacy National Battlefield (MONO) sits in an area of intermediate development in Frederick County, Maryland.
- Catocin Mountain Park (CATO), is also located in Frederick County, Maryland, and has one of the most rural settings of the NCR parks.
- Harpers Ferry National Historical Park (HAFE) is located at the confluence of the Potomac and Shenandoah Rivers, in the states on Maryland, Virginia, and West Virginia.

Each park will have wetlands and riparian areas assessed. Findings are expected to have wide applicability to parks throughout the eastern United States. The plan and EA will provide guidance to managers trying to set priorities for preservation and protection, mitigating impacts to wetlands that may be damaged or lost while implementing park management objectives, and

mitigating the effects of shoreline erosion and subsequent wetland loss from climate change.

To date, a GIS/desktop wetland delineation review was performed to locate potential degraded wetland or stream areas that may have restoration or enhancement opportunities. These areas identified in the review are proposed for further field evaluations. The GIS data provided by the four parks allowed the mapping of wetlands and streams in areas such as open agricultural fields or in areas of known development or disturbance, such as road crossings, parking lots, or residential areas along the park's boundary edges. A total of fifty-five (55) potential study areas, totaling approximately 1,500, acres were identified in this review.

The purpose of this letter is to inform you of the proposed plan, to request comments on the proposed plan to manage and protect wetlands, and to request comment on the areas of potential effect (APE). In accordance with Section 106 of the NHPA, we are initiating consultation. We request comments and ideas on potential issues, concerns, and opportunities to include in the development of the plan alternatives, our plan to develop a programmatic agreement, and other potential stakeholders to engage in consultation.

We look forward to receiving any guidance or comments you may have regarding the project. If you have any questions or require further information, please contact me at (202) 619-7405.

Thank you for your attention to this request.

Send responses to:

Joel Gorder  
Regional Environmental Coordinator  
National Capital Region, National Park Service  
1100 Ohio Drive Southwest  
Washington, DC 20242  
202.619.7405 (office)  
Joel\_Gorder@nps.gov

Sincerely,



Joel Gorder  
Regional Environmental Coordinator  
National Capital Region, National Park Service



## COMMONWEALTH of VIRGINIA

### Department of Historic Resources

Molly Joseph Ward  
*Secretary of Natural Resources*

2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan  
*Director*

Tel: (804) 367-2323  
Fax: (804) 367-2391  
[www.dhr.virginia.gov](http://www.dhr.virginia.gov)

September 7, 2016

Joel Gorder, Regional Environmental Coordinator  
National Capital Region  
National Park Service  
1100 Ohio Drive Southwest  
Washington, D. C. 20242

Re: Proposed Wetland Restoration Action Plan  
Harper's Ferry National Historical Park  
DHR File No. 2016-0846

Dear Mr. Gorder:

Thank you for your letter of August 9, 2016 informing us that the National Park Service (NPS) is preparing a Wetlands Restoration Action Plan (WRAP) to outline steps that parks can implement to contribute to Chesapeake Bay watershed protection. Harper's Ferry National Historical Park will participate in this project

We understand that NPS intends to prepare a programmatic agreement for the WRAP in accordance with 36 CFR Part 800.14(b) of the regulations implementing Section 106 of the National Historic Preservation Act. It would be helpful to understand whether this plan will include all parks within the Chesapeake Bay watershed, including not only those in the National Capitol Region, but those in the Northeast Region as well. It would also be helpful to know whether the NPS has approached the Corps of Engineers in developing this plan and whether the Corp has designed the NPS as the lead federal agency. State agencies, such as the Department of Game and Inland Fisheries and the Department of Environmental Quality in Virginia will also be interested. Further we note the public has been invited to comment in the Scoping Newsletter dating July 2016. Has NPS also invited the comments of federally recognized tribes?

Western Region Office  
962 Kirme Lane  
Salem, VA 24153  
Tel: (540) 387-5443  
Fax: (540) 387-5446

Northern Region Office  
5357 Main Street  
PO Box 519  
Stephens City, VA 22655  
Tel: (540) 868-7029  
Fax: (540) 868-7033

Eastern Region Office  
2801 Kensington Avenue  
Richmond, VA 23221  
Tel: (804) 367-2323  
Fax: (804) 367-2391

You have requested comment on the areas of potential effects (APEs). Any comments seem premature as we do not see that you have defined any APE. We note that a GIS/desktop wetland review was performed to locate potential degraded wetland or stream areas that may have restoration or enhancement opportunities. We strongly encourage you to consider performing a similar review of known historic properties, in particular historic structures such as dams and archaeological sites. Following the records review we recommend using predictive models to assist in identifying the likely presence of unrecorded resources. Stream restoration, for example, may have a beneficial impact on archaeological sites by preventing further erosion but the associated ground disturbance may also have the potential for adverse impacts. As each park will have wetlands and riparian areas assessed, we strongly recommend that the team conducting the field assessment include a qualified archaeologist.

We look forward to working with you as the Environmental Assessment moves forward. If you have any questions, or if we may provide any further assistance, please do not hesitate to contact me at (804) 482-6088.

Sincerely,



Ethel R. Eaton, Ph.D., Senior Policy Analyst  
Division of Review and Compliance

Western Region Office  
962 Kime Lane  
Salem, VA 24153  
Tel: (540) 387-5443  
Fax: (540) 387-5446

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5357 Main Street  
PO Box 519  
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Fax: (540) 868-7033

Eastern Region Office  
2801 Kensington Avenue  
Richmond, VA 23221  
Tel: (804) 367-2323  
Fax: (804) 367-2391

## MARYLAND HISTORICAL TRUST - STATE HISTORIC PRESERVATION OFFICE



IN REPLY REFER TO:

### United States Department of the Interior

NATIONAL PARK SERVICE  
National Capital Region  
1100 Ohio Drive, S.W.  
Washington, D.C. 20242

1.A.1 (NCR-WRAP)

August 9, 2016

Elizabeth Hughes, Director  
State Historic Preservation Office  
Maryland Historical Trust  
100 Community Place, 3rd Floor  
Crownsville, Maryland 21032-2023  
Elizabeth.Hughes@maryland.gov

Dear Ms. Hughes:

The National Park Service (NPS) is preparing a Wetlands Restoration Action Plan (WRAP), to show efforts being made to enhance the larger Chesapeake Bay watershed. The project will help park managers understand steps that can be taken to meet the larger objective to track “functional gains” on wetlands and floodplains. The WRAP will outline plans that parks can implement to contribute to Chesapeake Bay Watershed protection. The potential impacts of implementing the plan will be identified and analyzed through an environmental assessment pursuant to the National Environmental Policy Act (NEPA). Additional NEPA analysis and National Historic Preservation Act (NHPA) consultation will be required at the time of site-specific action implementation. The NPS intends to prepare a programmatic agreement per 36 CFR 800.4(2) for the WRAP.

Four parks in the National Capital Region (NCR) will participate in this project and lie within the Chesapeake Bay Watershed. The four parks include:

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Each park will have wetlands and riparian areas assessed. Findings are expected to have wide applicability to parks throughout the eastern United States. The plan and EA will provide guidance to managers trying to set priorities for preservation and protection, mitigating impacts

to wetlands that may be damaged or lost while implementing park management objectives, and mitigating the effects of shoreline erosion and subsequent wetland loss from climate change.

To date, a GIS/desktop wetland delineation review was performed to locate potential degraded wetland or stream areas that may have restoration or enhancement opportunities. These areas identified in the review are proposed for further field evaluations. The GIS data provided by the four parks allowed the mapping of wetlands and streams in areas such as open agricultural fields or in areas of know development or disturbance, such as road crossings, parking lots, or residential areas along the park's boundary edges. A total of fifty-five (55) potential study areas, totaling approximately 1,500, acres were identified in this review.

The purpose of this letter is to inform you of the proposed plan, to request comments on the proposed plan to manage and protect wetlands, and to request comment on the areas of potential effect (APE). In accordance with Section 106 of the NHPA, we are initiating consultation. We request comments and ideas on potential issues, concerns, and opportunities to include in the development of the plan alternatives, our plan to develop a programmatic agreement, and other potential stakeholders to engage in consultation.

We look forward to receiving any guidance or comments you may have regarding the project. If you have any questions or require further information, please contact me at (202) 619-7405.

Thank you for your attention to this request.

Send responses to:

Joel Gorder  
Regional Environmental Coordinator  
National Capital Region, National Park Service  
1100 Ohio Drive Southwest  
Washington, DC 20242  
202.619.7405 (office)  
Joel\_Gorder@nps.gov

Sincerely,

A handwritten signature in blue ink, appearing to read 'Joel Gorder', is written over a horizontal line.

Joel Gorder  
Regional Environmental Coordinator  
National Capital Region, National Park Service

## WEST VIRGINIA DIVISION OF CULTURE AND HISTORY



IN REPLY REFER TO:

### United States Department of the Interior

NATIONAL PARK SERVICE  
National Capital Region  
1100 Ohio Drive, S.W.  
Washington, D.C. 20242

#### 1.A.1 (NCR-WRAP)

August 9, 2016

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

Dear Ms. Pierce:

The National Park Service (NPS) is preparing a Wetlands Restoration Action Plan (WRAP), to show efforts being made to enhance the larger Chesapeake Bay watershed. The project will help park managers understand steps that can be taken to meet the larger objective to track “functional gains” on wetlands and floodplains. The WRAP will outline plans that parks can implement to contribute to Chesapeake Bay Watershed protection. The potential impacts of implementing the plan will be identified and analyzed through an environmental assessment pursuant to the National Environmental Policy Act (NEPA). Additional NEPA analysis and National Historic Preservation Act (NHPA) consultation will be required at the time of site-specific action implementation. The NPS intends to prepare a programmatic agreement per 36 CFR 800.4(2) for the WRAP.

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guidance to managers trying to set priorities for preservation and protection, mitigating impacts to wetlands that may be damaged or lost while implementing park management objectives, and mitigating the effects of shoreline erosion and subsequent wetland loss from climate change.

To date, a GIS/desktop wetland delineation review was performed to locate potential degraded wetland or stream areas that may have restoration or enhancement opportunities. These areas identified in the review are proposed for further field evaluations. The GIS data provided by the four parks allowed the mapping of wetlands and streams in areas such as open agricultural fields or in areas of know development or disturbance, such as road crossings, parking lots, or residential areas along the park's boundary edges. A total of fifty-five (55) potential study areas, totaling approximately 1,500, acres were identified in this review.

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We look forward to receiving any guidance or comments you may have regarding the project. If you have any questions or require further information, please contact me at (202) 619-7405.

Thank you for your attention to this request.

Send responses to:

Joel Gorder  
Regional Environmental Coordinator  
National Capital Region, National Park Service  
1100 Ohio Drive Southwest  
Washington, DC 20242  
202.619.7405 (office)  
Joel\_Gorder@nps.gov

Sincerely,



Joel Gorder  
Regional Environmental Coordinator  
National Capital Region, National Park Service



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

**Randall Reid-Smith, Commissioner**

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

Mr. Joel Gorder  
Regional Environmental Coordinator  
National Capital Region, National Park Service  
1100 Ohio Drive Southwest  
Washington, D.C. 20242

RE: Wetlands Restoration Action Plan (WRAP)  
FR#: 16-917-MULTI

Dear Mr. Gorder:

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

Thank you for notifying this office about the Wetlands Restoration Action Plan (WRAP) being prepared by the National Park Service (NPS) for four parks in the National Capital Region, including two that are partially located in West Virginia – the C&O Canal National Historical Park and Harpers Ferry National Historical Park. It is our understanding that the WRAP will outline plans that parks can implement to contribute to the Chesapeake Bay Watershed protection and that potential impacts of implementing the plan will be identified and analyzed through an environmental assessment. It is also our understanding that consultation pursuant to Section 106 of the National Historic Preservation Act will occur at the time of site-specific action implementation.

To date, a GIS/desktop wetland delineation review has been performed to locate potential degraded wetland or stream areas and that a total of 55 potential study areas were identified. The submitted information did not include details regarding the study areas, so we cannot provide more specific comments at this time regarding any of the proposed areas of potential effect. However, we have no objections to development of the WRAP and look forward to continuing the Section 106 consultation process once site-specific actions are developed.

We appreciate the opportunity to be of service. *If you have questions regarding our comments or the Section 106 process, please contact Lora A Lamarre-DeMott, Senior Archaeologist, at (304) 558-0240.*

Sincerely,

A handwritten signature in blue ink that reads "Susan M. Pierce".

Susan M. Pierce  
Deputy State Historic Preservation Officer

SMP/LLD



DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICE

United States Department of the Interior

NATIONAL PARK SERVICE  
National Capital Region  
1100 Ohio Drive, S.W.  
Washington, D.C. 20242

IN REPLY REFER TO:

1.A.1 (NCR-WRAP)

December 29, 2016

Mr. David Maloney  
District of Columbia Historic Preservation Officer  
District of Columbia Historic Preservation Office  
1100 4th Street S.W., Suite E650  
Washington, D.C. 20024

Dear Mr. Maloney:

The National Park Service (NPS) is preparing a Wetlands Restoration Action Plan (WRAP), to show efforts being made to enhance the larger Chesapeake Bay watershed. The project will help park managers understand steps that can be taken to meet the larger objective to track “functional gains” on wetlands and floodplains. The WRAP will outline plans that parks can implement to contribute to Chesapeake Bay Watershed protection. The potential impacts of implementing the plan will be identified and analyzed through an environmental assessment pursuant to the National Environmental Policy Act (NEPA). Additional NEPA analysis and National Historic Preservation Act (NHPA) consultation will be required at the time of site-specific action implementation. The NPS intends to prepare a programmatic agreement per 36 CFR 800.4(2) for the WRAP.

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Thank you for your attention to this request.

Send responses to:

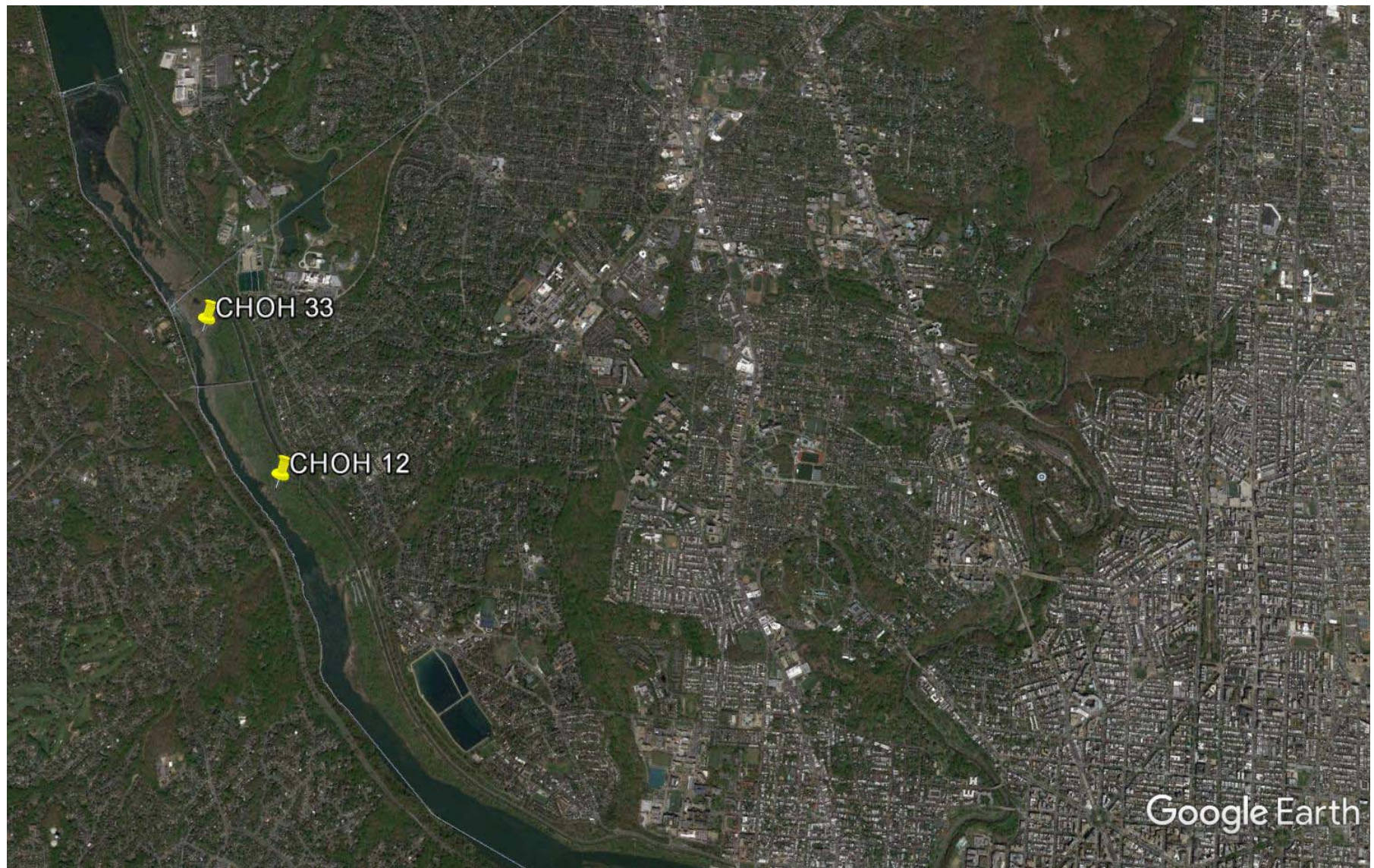
Joel Gorder  
Regional Environmental Coordinator  
National Capital Region, National Park Service  
1100 Ohio Drive Southwest  
Washington, DC 20242  
202.619.7405 (office)  
Joel\_Gorder@nps.gov

Sincerely,



Joel Gorder  
Regional Environmental Coordinator  
National Capital Region, National Park Service

NPS NCR – Wetland Restoration Action Plan/Environmental Assessment  
DC Location.



\\lovetongis\GISdata\Federal\Northeast\NCR\_WRAP\CHOHMXD\SURVEY\Results\CHOH\_Figure33\_CHOH-12.mxd

Site ID	CHOH-12
Potential Restoration (linear feet)	600
Date	4/28/2016
Existing Land Use	Forested parkland-Upland previously disturbed
Adjacent Land Use	Forested parkland; huge wetland complex at downstream end of reach
Distance to Nearest Road	along tow path
Stream Hydrology	Perennial
RTE Species Present?	No
Known Cultural Concern?	No
Wetland Restoration Opportunity?	Yes
Existing Wetlands Present	No
Evidence of Disturbance	Yes
Can Restoration be Completed in NPS Area?	Yes
Estimated Bank Erosion Score	6
Degree of Channel Incision Score	9
Existing Floodplain Access Score	10
Opportunity for Floodplain Development Score	10
Threat of Impact to Resources Score	5
Surrounding Vegetation Score	6
Land Use Score	3
Opportunity for Ecological Lift Score	8
Ease of Access	6
Surrounding Land Use Score	6
Total Score	69
Invasives Species Control?	Yes
Riparian Buffer Enhancement?	Yes
Restore Natural Hydrology?	Yes
Livestock Agricultural Exclusion	No
Fish Passage?	No
Channel Restoration?	Yes
Increase Aesthetic or Educational Value?	Yes

**Other** No

Banks are steep and high but not severely eroding, vegetated with Ficara which is likely reducing erosion. At upstream portion of reach, erosion is extreme at over 20 feet; at downstream portion of reach, channel has recovered and is completely connected to the floodplain. Out of bank flooding does not occur at upstream portion of reach due to bank height. Channel disconnected to floodplain. Forest is young in age and dominated by Chinese wisteris, pawpaw, silver maple, elm, and box elder (new mature trees). No immediate threat but potential future threat of erosion continues. Could reconnect floodplain to improve habitat. May require equipment under pedestrian bridge; would have to cross canal. Stream appears straightened. Surrounding area is upland and dominated by invasive species at upstream end. Downstream most portion of the reach is stable, connected to floodplain but with Japanese knotweed. Stream and floodplain restoration proposed at upstream portion of reach to reconnect stream to floodplain and treat for invasives. Tie in to downstream point and do not disturb wetland at downstream end. Add meander bends and in stream habitat.

Notes



- Legend**
- 1 Mile Marker
  - Park Boundary
  - Study Area
  - Waters of the US (WUS)
- Proposed Conditions**
- Bank Armoring
  - Channel Cross Vane
  - Invasive Species Control and Native Plantings

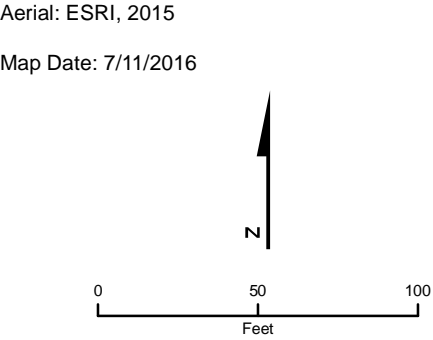
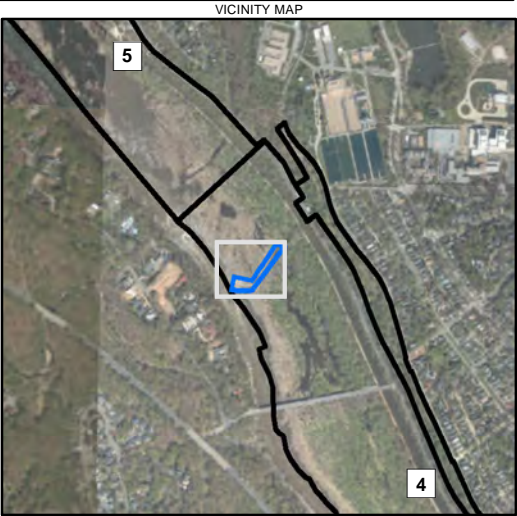


Figure 33  
CHOH-12  
C&O Canal  
NPS/NCR Wetland Restoration Action Plan  
Frederick, Maryland

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Site ID	CHOH-33
Potential Restoration Area (Acres)	0.50
Date of Field Assessment	4/28/16
Existing Land Use	Abandoned paved
Adjacent Land Use	Forested park land
Distance to Nearest Road	100 feet towpath
RTE Species Present?	No
Known Cultural Concern?	No
Stream Restoration Opportunity?	No
Site Currently Wetland?	No
Site Formerly Wetland?	Yes
Evidence of Disturbance	Yes
Soils Score	0
Hydrology Score	2
Existing Vegetation Score	10
Geomorphic Score	8
Surrounding Land Use Score	10
Function and Value Score	10
Presence of Invasive Species Score	4
Site Disturbance Score	10
Ease of Access Score	7
Stormwater Influence Score	10
Total Score	71
Invasive Species Control?	No
Native Plantings?	Yes
Restore Hydrology?	Yes
Increase Diversity?	Yes
Convert Open Water to Vegetated?	No
Convert Emergent to Shrub/Forested	No
Increase Aesthetic or Educational Value	Yes
Other	No
Notes	Potential for restored RTE species. Completely paved. Historic hydrology may have been Potomac River floodplain and groundwater inflow. No vegetation on paved area but surrounding area is sycamore dominated. Upland forested park land to northeast. No stormwater influence observed. Existing pavement appears abandoned and could be removed. Flood plane and native plantings could be restored. Visitor access could be improved aesthetically. Could create fishing pier and bird viewing area.



- Legend**
- 1 Mile Marker
  - Park Boundary
  - Study Area
  - Proposed Conditions**
  - Concrete Removal
  - Invasive Species Control and Native Plantings

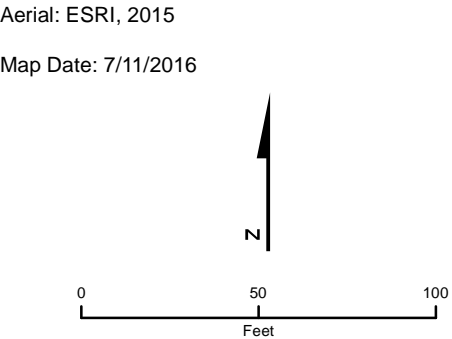


Figure 47  
CHOH-33  
C&O Canal  
NPS/NCR Wetland Restoration Action Plan  
Frederick, Maryland

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
STATE HISTORIC PRESERVATION OFFICER



February 3, 2017

Mr. Joel Gorder  
National Park Service  
National Capital Region  
1100 Ohio Drive, SW  
Washington, DC 20242

RE: Initiation of Section 106 Consultation for the Wetland Restoration Action Plan (WRAP) C&O  
Canal National Historical Park

Dear Mr. Gorder:

Thank you for initiating consultation with the District of Columbia State Historic Preservation Officer (SHPO) regarding the above referenced undertaking. We have reviewed the project submittal and are writing to provide our initial comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

Based upon our initial review, we understand that the WRAP will identify a range of wetland restoration actions. The NPS proposes to evaluate the effects of those actions on historic properties by developing a Programmatic Agreement (PA) pursuant to 36 CFR 800.14(b). However, since we also understand that *only two* WRAP sites have been identified within the District of Columbia, we do not wish to participate in the development of the PA. Instead, we believe it would be more appropriate and efficient to follow the standard four-step process outlined in 36 CFR 800.3 through 800.6 for the two sites – both of which are located within the C&O Canal National Historic Park.

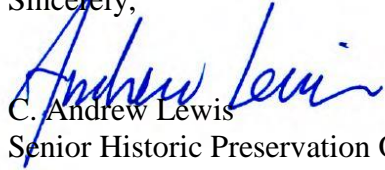
Given the limited information that is available regarding the wetland restoration actions, it is not yet possible to provide specific comments about the likelihood of effects on historic built environment resources, but the general descriptions included in the project submittal suggest that effects on such resources, adverse or otherwise, are unlikely. We will provide more detailed comments as consultation continues.

With regard to archaeology, the two proposed WRAP sites have high potential for prehistoric, colonial and industrial resources and there are known archaeological sites near the project areas. Therefore, any ground disturbing activities in these areas will need to be planned to identify and avoid archaeological resources. Archaeological testing may also be needed if ground disturbance is proposed in untested areas and it may be necessary to hire professional archaeological consultants to conduct an archaeological survey.

Finally, we noted the “study areas” identified in the project submittal but are unable to provide comments about Area(s) of Potential Effect (APE) until we learn more about the types of actions will be proposed as part of the overall WRAP initiative, including those that may occur off-site and those that may have the potential to result in indirect effects. To expedite the process, the NPS may propose a draft APE for review and comment by our office.

If you should have any questions or comments regarding this matter, please contact me at [andrew.lewis@dc.gov](mailto:andrew.lewis@dc.gov) or 202-442-8841. Questions relating to archaeology should be directed to Ruth Troccoli at [ruth.troccoli@dc.gov](mailto:ruth.troccoli@dc.gov) or 202-442-8836. Otherwise, we look forward to consulting further with you to continue the Section 106 review process.

Sincerely,



C. Andrew Lewis  
Senior Historic Preservation Officer  
DC State Historic Preservation Office

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## **APPENDIX B**

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### **WETLANDS RESTORATION ACTION PLAN FOR CATOCTIN MOUNTAIN PARK, CHESAPEAKE & OHIO CANAL NATIONAL HISTORICAL PARK, HARPERS FERRY NATIONAL HISTORICAL PARK, AND MONOCACY NATIONAL BATTLEFIELD**

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