



FINDING OF NO SIGNIFICANT IMPACT

PARKWIDE UTILITY INFRASTRUCTURE REPLACEMENT

CATOCTIN MOUNTAIN PARK

Frederick County, Maryland

The National Park Service (NPS) prepared an Environmental Assessment (EA) to evaluate the potential environmental impacts associated with replacing parkwide utility infrastructure in Catoctin Mountain Park (Park), an administrative unit of the national park system located in Frederick County, Maryland. This project involves replacing aging (ranging from 25 to 80 years old) park owned and operated infrastructure systems that include potable water, sanitary sewer, electric power, and communications. The project is intended to comprehensively correct serious deficiencies that directly affect the natural environment, park personnel, and visitors, and will bring utility systems up to local, state, and national operational standards. The project is needed to eliminate excessive groundwater infiltration into the aged sewer collection system and assure code compliant discharges. It will replace an outdated potable water treatment and distribution system including rehabilitation of fire hydrants. The communication network will be significantly upgraded, eliminating redundant systems, and linking parkwide business offices. Additionally, the integrated communication technology will allow facilities management professionals to monitor real-time water flow, treatment, storage, and distribution systems. It will replace unreliable/non-functional cell-based telemetry.

The EA was prepared in accordance with the National Environmental Policy Act (NEPA) (42 United States Code (USC) § 4332) and the Council on Environmental Quality implementing regulations effective September 14, 2020 (40 Code of Federal Regulations (CFR) §§ 1500-1508); US Department of the Interior NEPA regulations (43 CFR 46); NPS Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision-Making*; and the NPS NEPA Handbook. The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file.

PUBLIC AND AGENCY INVOLVEMENT

Public Scoping - As part of the NEPA process, the NPS involved the public in project scoping by holding a 30-day public comment period from February 12, 2021, to March 13, 2021. A virtual public meeting was also held on February 24, 2021, using the WebEx platform. The scoping period and virtual meeting was announced through a press release and by sending a scoping letter by email blast to agencies, stakeholders, and other potentially interested parties from a mailing list established for the Project. The NPS Planning, Environment and Public Comment (PEPC) project webpages were updated to include the public scoping information. In total, three public comments were received, two were concerning the impacts to trees, and the third had concern for the potential vandalism of new infrastructure in remote areas of the Park (https://parkplanning.nps.gov/cato_utility).

EA Public Review - The EA was made available for public review and comment from August 31, 2021, to September 29, 2021, at the NPS PEPC project webpage (https://parkplanning.nps.gov/cato_utility).

The EA public review period was announced through a press release and e-mail blast and was uploaded for public comment to the NPS PEPC website. Two comments were received during the EA public review period. One commenter provided support for the proposed action, while the second commenter had concerns regarding tree loss, project duration, and impacts to visitor experience.

National Historic Preservation Act, Section 106 Consultation – Pursuant to Section 106 of the National Historic Preservation Act (54 USC § 306101) and its implementing regulations (36 CFR Part 800) require federal agencies to take into consideration the effects projects have on historic properties. In alignment with Section 106 and the Programmatic Agreement Among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers with Compliance for Section 106 of the National Historic Preservation Act (2008), the Park initiated formal consultation with the Maryland Historic Trust, the State Historic Preservation Office (SHPO) on December 18, 2020. The Park submitted a formal cover letter, the schematic design drawings dating to July 2020, the draft archeological survey report in December 2020, photographs of the project area, maps identifying the project area and Area of Potential Effect, and a list of potentially impacted resources, but no effects assessment. The SHPO responded to the Park on February 2, 2021. The Park submitted a Section 106 Assessment of Effect package to the SHPO in a letter dated August 9, 2021, recommending that this project will have no adverse effect on historic resources. The SHPO concurred with the NPS that this project will have no adverse effect in a document dated September 14, 2021.

Tribal Consultation - Tribal consultation initiation letters were sent to the Delaware Nation, Seneca-Cayuga Nation, and Tuscarora Nation on February 10, 2021, and a Section 106 Assessment of Effect package was submitted on August 11, 2021. No response was received.

Maryland Department of Natural Resources – The Park staff consulted with the Maryland Forest Service Western Region Coordinator for Urban and Community Forestry on March 10, 2021. It was determined that a Forest Conservation Plan is not required because land disturbance will be less than 40,000 square feet and forest clearing will be less than 20,000 square feet. The Maryland Roadside Tree Law does not apply because there is no work occurring in a right-of-way. In addition, consultation occurred regarding future permitting and erosion/sediment control and stormwater management plan approval.

Town of Thurmont – The Department of Public Works was notified of the construction.

Frederick County Department of Health – A well system modification review was performed for well 5A in conjunction with Maryland Department of the Environment.

U.S. Army Corps of Engineers – Consultation occurred in accordance with Nationwide 3 and Nationwide 12, and reissuance and modification of nationwide permits, including nationwide permits 57 and 58. Nationwide permits are suspended in Maryland due to State Programmatic General Permits.

U.S. Fish and Wildlife Service (USFWS) – In accordance with Section 7 of the Endangered Species Act, an official species list was obtained through the US Fish and Wildlife Service's Information, Planning, and Consultation (IPaC) System on February 8, 2021. Since the endangered Indiana Bat and threatened northern long-eared bat were on the species list but there were no designated critical habitats listed within the project area, the Park sent a consultation letter to USFWS on March 15, 2021. On April 14, 2021, USFWS concurred that the federally endangered Indiana bat and federally threatened northern long-eared bat are known to occur in the project vicinity and that this project as proposed is not likely to adversely affect the species because tree clearing will occur from September 1 through April 30, which is a time period when both species are hibernating in caves and not using forested habitat.

ALTERNATIVES CONSIDERED AND SELECTED

The EA analyzed two alternatives: (1) no action, and (2) Replacement of Critical Infrastructure. Based on the analysis presented in the EA, the NPS selected Alternative 2 - Replacement of Critical Infrastructure (the NPS Preferred Alternative) for implementation. The selected alternative takes a comprehensive approach to replacing and upgrading much needed infrastructure within the Park. The majority of this work will be conducted in already developed areas, along roadways, or in areas that have been previously disturbed. New utility corridors were aligned to minimize the loss of trees in the Park. Overall, the project would consist of the following (See EA, pages 5-9 for more detail):

- Consolidation of the water distribution and storage system into a centralized location near Camp Greentop for Camp Greentop, Camp Round Meadow, and Camp Misty Mount.
- Jim Brown wells (two total) would be rehabilitated and would supply raw water to a centralized chemical treatment location and water storage tank. Jim Brown Well House No. 1 would be rehabilitated.
- A well located near the horse trailer parking lot would be placed in service as a supplementary source of raw water for the central treatment facility.
- Owens Creek Campground would be served by a stand-alone water system supplied by the repaired Ike Smith Well House.
- Primary water mains would be replaced for Camp Misty Mount and Camp Round Meadow.
- Primary sewer mains would be replaced at Camp Misty Mount, Camp Round Meadow, and Camp Greentop.
- Rehabilitation of the Camp Greentop sewage lift station and replacement of the sewage lift station at Camp Round Meadow.
- Primary site electrical replacement for Camp Misty Mount, Camp Round Meadow, and Camp Greentop, including transformer replacement, as applicable.
- Fiber-optic backbone installation on the west side of the Park from Camp Round Meadow gym to the new centralized treatment building location, with hardwire nodes to connect the treatment facilities (well houses, lift station, centralized treatment building, water storage tank).
- Fiber-optic installation on the east side of the Park from the Centralized Treatment Building to the Visitor Center.
- Safely decommission the existing Camp Misty Mount, Camp Greentop, and Camp Round Meadow water tanks.
- Abandon in place Ike Smith Booster Station, Blue Blazes Well House No. 1, Poplar Grove Well House, and Blue Blazes Well House No. 2.
- Two new structures would be constructed near Camp Greentop, about 350 feet from the existing Camp Greentop water tank. The structures include a centralized treatment building with an approximate area of 593 square feet, and a 60,000-gallon water tank with an approximate area of 1,494 square feet. Land disturbance would extend 20 feet from each side of the structure.

Overall, approximately 75 utility structures are included in the site design, consisting of sanitary sewer manholes, air valves, water meters, sewer meters, electrical meters, fire hydrants, and fiber-optic splice relief valves. Staging areas are included in this project. The project will require trenching approximately 37,000 linear feet for the replacement of existing or addition of new infrastructure. Approximately 1,100 linear feet of trenching would take place in areas that have not previously been disturbed.

RATIONALE FOR DECISION

The NPS selected the Replacement of Critical Infrastructure alternative for implementation because it will replace aging (ranging from 25 to 80 years old) Park owned and operated infrastructure systems that include potable water, sanitary sewer, electric power, and communications. The project will comprehensively correct serious deficiencies that directly affect the natural environment, park personnel, and visitors and will bring utility systems up to local, state, and national operational standards.

The No Action Alternative did not satisfy the need for the project because of the inefficiencies of trying to maintain systems at the end of their useful life, many of which fail to meet current local, state, and national operational standards.

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. Mitigation measures of the selected alternative are provided with this FONSI as Attachment A. These mitigation measures will allow the NPS to meet its conservation mandates as required by the Organic Act (16 USC 1 *et seq.*) and to comply with Sections 404 and 401 of the Clean Water Act, the District's 2013 Rule on Stormwater Management and Soil Erosion and Sediment Control, and the District's Municipal Regulations.

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT IMPACT

As documented in the EA, the selected alternative has the potential for adverse and beneficial impacts on visitor use and experience (see EA page 10); vegetation, wildlife, and other species of concern (see EA pages 11-12); historic districts, cultural landscapes, and archeological resources (see EA pages 12-15). The NPS has determined that the selected alternative can be implemented without a significant effect on the human environment.

Visitor Use and Experience – During implementation of the proposed infrastructure replacement project, areas where the construction is occurring will be closed to Park visitors. As a result, Park visitors could be forced to find different locations to recreate or be bothered by the noise associated with installation of these new utilities. These impacts will be temporary and occur at different locations at different times. Once these improvements have been made, the impacted areas will be restored.

Vegetation, Wildlife, and Other Special Concern Species - The majority of actions associated with this infrastructure replacement project will take place in areas that are currently developed, in areas that have been previously disturbed, within structures, or attached to structures in a non-conspicuous manner. As a result, the impacts to vegetation and wildlife in these areas will be minimal. The majority of new impacts to vegetation and wildlife habitat will be focused on those areas where trenching for new utility lines in previously undisturbed areas will occur or in those utility corridors where vegetation has re-established itself. In these areas, trees and other vegetation will be removed and open trenching will occur. The total sum acreage of land disturbance is approximately 14.36 acres, which includes disturbance of turf in open areas. Impacts to wildlife will be some loss of roosting and nesting areas, temporary displacement, disruption from construction equipment, and localized impediments to wildlife movement. The removal of trees could cause an increase of edge habitat, thereby benefiting wildlife species that prefer edge habitat, and possibly decreasing other wildlife species that prefer forest interior habitat.

Historic Districts, Cultural Landscapes, and Archeological Resources -

This project would occur within the boundaries of three overlapping historic districts: Catocin Mountain Park Historic District, Camp Misty Mount Historic District, and Camp Greentop Historic District. Catocin Mountain Park was listed on the National Register of Historic Places in 2014. Camp Greentop and Camp Misty Mount were listed in 1989 as part of a Multiple Property Documentation Submission for

Emergency Conservation Work Architecture at Catoctin Mountain Park. The NPS manages each district as a cultural landscape, with SHPO-concurred Cultural Landscape Inventories (CLI) completed for Catoctin Mountain Park and Camp Misty Mount in 2004 and Camp Greentop in 2016.

In accordance with Section 106 of the National Historic Preservation Act, the NPS evaluated the potential for adverse effects to historic resources, including historic districts, cultural landscapes, and archeological resources, within the Area of Potential Effect. The NPS determined, and on September 14, 2021, the SHPO concurred, that this Project will have no adverse effects to historic resources. The SHPO concurred with the NPS that the installation of a new water treatment building, the removal of trees and vegetation, and the minor modification and/or replacement of above-ground utilities would be completed in a way that limits impacts to the historic setting and are designed in a way that blends in with the surrounding landscape. The SHPO also concurred that the modifications to five buildings that are contributing to the historic district/cultural landscape—the rehabilitation of one historic well house; the abandonment of one booster station and one historic well house; and the installation of fiber optic cables through the visitor center and gymnasium—would not result in an adverse impact. The rehabilitation work is carefully considered to minimize visual changes to the character-defining features of the well house. The abandonment of the well houses is temporary, and the structures will be prepared in alignment with federal guidelines for mothballing historic structures. The routing of fiber optic cable through the visitor center and gymnasium will be completed in a way that limits visual impacts to the exterior of the buildings. In preparation for actions described in this planning document, Secretary of the Interior-Qualified Archeologists completed a Phase I Archeological Survey and Addendum Phase I Archeological Survey of the Project Area to identify potential impacts to archeological resources. The SHPO also concurred with the NPS that this project will not impact any archeological resources eligible for or listed on the National Register of Historic Places.

CONCLUSION

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

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

RICHARD SLADEDigitally signed by RICHARD
SLADE

Date: 2021.10.28 12:04:31 -04'00'

Recommended:

Rick Slade
Superintendent
Catoclin Mountain Park
Region 1 - National Capital Area

Date

**LISA MENDELSON-
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MENDELSON-IELMINI

Date: 2021.11.05 19:30:40 -04'00'

Approved:

Kym A. Hall
Area Director
Region 1 - National Capital Area

Date

ATTACHMENTS

- Attachment A: Mitigation Measures
- Attachment B: Non-Impairment Determination
- Attachment C: Agency Consultation Documentation

ATTACHMENT A: MITIGATION MEASURES

Mitigation measures of the selected alternative are provided below organized by the impact topics evaluated in the EA.

WATER QUALITY

- A mandatory ESC Plan will be developed prior to construction to comply following guidance and best practices from COMAR 26.17.03 – Erosion and Sediment Control.

WETLANDS

- Matting will be placed over wetlands along the construction access path as a voluntary measure to minimize disturbance. The mats will be installed in a way that will not obstruct flow through the wetland from upslope to downslope of the access path during construction.
- Pipe-bursting will be used to install lines under wetlands and waterways where possible.
- Native herbaceous wetland plants will be salvaged as a voluntary measure, if feasible, and replanted within the wetland after the restoration is complete to minimize impacts to herbaceous wetland plants. Any supplemental plantings will include native species from sources within the same ecoregion.

VEGETATION

- Tree removal would be limited to the minimum number necessary to accomplish the project.
- Measures will be implemented to minimize impacts to trees that are to remain post-construction, including, but not limited to, installing tree protection fencing and root pruning.
- A native seed mix will be used in natural/non-lawn areas.
- Re-use of native soils will be encouraged to reduce the possibility of non-native plants being introduced in imported soils and gravel.
- Construction vehicles will be washed at an onsite wash station as a voluntary measure to ensure that invasive plant seeds and propagules, and other weed seeds, are not transported into the site.

ARCHEOLOGY

- If previously unknown archeological resources are discovered during sub-surface ground disturbing activities, the NPS will suspend operations at the site and immediately contact the appropriate cultural resource specialist, who will arrange for a determination of eligibility in consultation with the State Historic Preservation Office (SHPO) and, if necessary, develop a recovery plan.

RARE, THREATENED, AND ENDANGERED SPECIES

- No tree removal would occur from May 1 to August 31 to ensure avoidance of the northern long-eared bat and Indiana bat pup season (June 1 to July 31) and bird nesting season (May 1 to August 31). No tree removal would occur within a .25-miles of a northern long-eared bat or Indiana bat hibernation site.

ATTACHMENT B: NON-IMPAIRMENT DETERMINATION

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), 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 1100101).

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 will 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 will 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...and other impacts*” (NPS 2006 sec 1.4.5).

This determination on impairment has been prepared for the selected alternative described in the Finding of No Significant Impact (FONSI). An impairment determination is made for vegetation, wildlife, and other special of concern species; and historic districts, cultural landscapes, and archeological resources. An impairment determination has not been made for visitor use and experience because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the Organic Act and cannot be impaired in the same way that an action can impair park resources and values.

VEGETATION, WILDLIFE HABITAT, AND OTHER SPECIES OF CONCERN

The majority of impacts to vegetation and wildlife would take place in the area where trenching would occur, which would require the removal of trees and other vegetation along the entire length of the trench alignment, the total sum acreage of this land disturbance is approximately 14.36 acres, which includes disturbance of turf in open areas. Areas where tree and vegetation removal would be focused include the shoulder of Park Central Road, a new utility corridor between Camp Misty Mount and the Visitor Center, the site of the new centralized chemical treatment building and water storage tank, and existing utility/road rights-of-way. While approximately 14.36 acres of impact seems substantial, the impacts are spread across the Park in linear areas and in some previously disturbed areas. Over time, the disturbed areas will revegetate, and some areas will be maintained to keep trees out of the new utility corridors. The impacts on vegetation and wildlife habitat would not impede the purpose of the Park nor inhibit the continued use of the area and would not be considered an impairment to these resources.

HISTORIC DISTRICTS, CULTURAL LANDSCAPES, AND ARCHEOLOGICAL RESOURCES

Proposed actions associated with this project will have no significant impact on historic districts, archeological resources, and cultural landscapes. The SHPO concurred with the NPS that the installation of a new treatment facility, the removal of trees and vegetation, and the minor modification and/or replacement of above-ground utilities would be completed in a way that limits impacts to the historic setting and are designed in a way that blends in with the surrounding landscape. The SHPO also concurred that the modifications to five buildings that are contributing to the historic district/cultural landscape—the rehabilitation of one historic well house; the abandonment of one booster station and one historic well house; and the installation of fiber optic cables through the visitor center and gymnasium—

would not result in an adverse impact. The rehabilitation work is carefully considered to minimize visual changes to the character-defining features of the well house. The abandonment of the well houses is temporary, and the structures will be prepared in alignment with federal guidelines for mothballing historic structures. The routing of fiber optic cable through the visitor center and gymnasium will be completed in a way that limits visual impacts to the exterior of the buildings. All areas associated with the project were surveyed for the presence of significant archeological resources, and the SHPO concurred with the NPS that this project will not impact any archeological resources eligible for or listed on the National Register of Historic Places. Because the actions presented under the selected alternative will result in no significant impacts to historic resources, and the Park will carry out all reasonable measures to protect and preserve their condition and integrity, there will be no impairment of the historic resources.

CONCLUSION

The NPS has determined that the implementation of the NPS selected alternative will not constitute an impairment of the resources or values of Catoctin Mountain 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 (NPS 2006).

ATTACHMENT C: AGENCY CONSULTATION DOCUMENTATION



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Chesapeake Bay Field Office
177 Admiral Cochrane Drive
Annapolis, Maryland 21401
<http://www.fws.gov/chesapeakebay>

April 14, 2021

Rebecca Loncosky
National Park Service
Catoctin Mountain Park
6602 Foxville Road
Thurmont, MD 21788

Re: "Not Likely to Adversely Affect" determinations for the Indiana bat and northern long-eared bat for CATO-250011; Replace Parkwide Utility Infrastructure at Catoctin Mountain Park in Thurmont in Frederick County, Maryland

Dear Ms. Loncosky:

The U.S. Fish and Wildlife Service (Service) has reviewed your project information from the Service's Information for Planning and Consultation (IPaC) online system dated February 8, 2021, your letter dated March 12, 2021, the 2015 Post-White-nose Syndrome Assessment of Bat Species Occupancy at Catoctin Mountain Park and Harper's Ferry National Historical Park – Interim Report, and all of your email messages. The Service has evaluated the potential effects of this project to the federally endangered Indiana bat (*Myotis sodalis*) and federally threatened northern long-eared bat (*Myotis septentrionalis*). The comments provided below are in accordance with Section 7 of the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*).

The purpose of this proposed project is to replace Park-owned and operated infrastructure systems (including potable water, sanitary sewer, electric power, and communications) with new systems that meet local, state, and national operational standards. The Catoctin Mountain Park was established in the 1930s making the existing infrastructure range in age from 25 to 80 years old. The aging infrastructure has caused drinking water compliance issues documented in a National Park Service Public Health Program memorandum, titled "Drinking Water Testing Results." This Project will correct infrastructure deficiencies that directly affect the natural environment, Park personnel, and visitors.

According to the 2015 bat survey report, the Indiana bat was detected at 10 Catoctin Mountain Park acoustic sites and the northern long-eared bat was detected at 9 Catoctin Mountain Park acoustic sites.

While the federally endangered Indiana bat and federally threatened northern long-eared bat are known to occur in the project vicinity, this project as proposed is "not likely to adversely affect"



the Indiana bat and northern long-eared bat because tree-clearing will occur from September 1 through April 30, which is a time period when both species are hibernating in caves and not using forested habitat.

No other federally proposed or listed endangered or threatened species will be affected by this proposed project. Should project plans change, or if additional information on the distribution of listed or proposed species becomes available, this determination may be reconsidered.

We appreciate the opportunity to provide information relevant to threatened and endangered fish and wildlife resources. This Endangered Species Act determination does not exempt this project from obtaining all permits and approvals that may be required by other state or Federal agencies. If you have any questions or concerns regarding this letter, please contact Trevor Clark of my Endangered Species staff at (410) 573-4527 or by email at trevor_clark@fws.gov.

Sincerely,

**GENEVIEVE
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Genevieve LaRouche
Field Supervisor

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NPS



United States Department of the Interior

NATIONAL PARK SERVICE

CATOCTIN MOUNTAIN PARK
6602 Foxville Road
Thurmont, MD 21788



EOJ / EUR

IN REPLY REFER TO:

CATO-1.A.2 COMPLIANCE

August 9, 2021

RECEIVED
AUG 11 2021

BY: _____

Elizabeth Hughes
State Historic Preservation Officer
Attn: Beth Cole, Administrator, Project Review and Compliance
Maryland Historical Trust
100 Community Place, 3rd Floor
Crownsville, MD 21032

Subject: **Catoctin Mountain Park: Replace Parkwide Utility Infrastructure**
Thurmont, Frederick County, Maryland
Section 106 Review
NPS PEPC 88406

FR 6.

Dear Ms. Hughes:

In accordance with Section 106 of the National Historic Preservation Act (NHPA), as amended, and the *Programmatic Agreement Among the National Park Service, Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers for Compliance with Section 106 of the National Historic Preservation Act*, Catoctin Mountain Park respectfully submits the following for your review.

In a letter dated December 18, 2020, we presented a proposal to replace and improve park-wide utility systems, including potable water, sanitary sewer, electrical power, and communications. Since our initial consultation package, we have prepared the enclosed assessment of actions having an effect on historic properties and associated materials.

Secretary of the Interior-Qualified cultural resources subject-matter experts (SME) on staff at the National Park Service (NPS) National Capital Area Office (NCA), Resource Stewardship & Science-Cultural Resources, and Catoctin Mountain Park (Park), Resources Division, have reviewed the proposed project and recommend that this project will have **no adverse effect** on historic properties. SME comments and recommendations include:

NCA Archeologist A: Review of the Phase I Archeological Survey Report was completed. The survey intensively investigated the APE for ground disturbing activities for adverse effects to archeological resources. The report concluded that no significant archeological resources would be impacted as a result of the proposed utility upgrades. No additional work was recommended. I concur with this determination.

NCA Archeologist B: No NRHP eligible archeological resources will be affected by this undertaking

NCA Historical Architect: A standing seam aluminum roof on the Centralized Treatment Building will have No Adverse Effect. The proposed location for fiber optic at the Round Meadow Gym will have No Adverse Effect. The proposed revised location for fiber optic at the Visitor Center will have No Adverse Effect. The Ike Smith Booster House and Blue Blazes Well House are to be abandoned in place. These will present a long-term concern for the park, as it will be difficult to justify maintenance for buildings that are not critical to the mission of the park. At a near future date, the park should plan for alternative uses for these buildings to

#Zna EUR/BL 9/14/21



ensure their long-term viability.

Park Architectural Historian: Throughout the design process, SMEs have worked very closely with project managers to identify and mitigate effects to historic resources. For example, the rehabilitation of the Jim Brown Wellhouse, which is managed by the park as contributing to the district, will be restored to its appearance during the period of significance. The removal of approximately 962 trees within the character-defining forested park landscape was carefully planned in consultation with the Regional Historic Landscape Architect to avoid significant visual gaps in the character-defining forested park landscape and a planting plan for native shrubs was prepared to mitigate open spaces in cabin camp areas and near the new treatment facility. Overall, this project will have no adverse effect on historic resources.

To support your review, we are enclosing the updated Basis of Design; Design Drawings; maps; photographs; two NPS Planning, Environment, and Public Comment (PEPC) forms; the Final Phase I Archeological Survey Report, which incorporates comments submitted by your office on February 2, 2021, the Addendum Phase I Archeological Investigations Management Summary, and the Draft Addendum Phase I Archeological Investigations Report.

We respectfully request your concurrence that the proposed project to replace parkwide utility infrastructure will have no adverse effect on historic properties. If you have questions or concerns about this project, please do not hesitate to contact Katie Wackrow, Cultural Resources Program Manager, Catoclin Mountain Park, by phone at (229) 815-0051 or by email at kathleen_wackrow@nps.gov.

Sincerely,

**RICHARD
SLADE**

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SLADE
Date: 2021.08.09 13:44:53
-04'00'

Rick Slade
Superintendent
Catoclin Mountain Park

Enclosures: Design Documents; NPS PEPC Forms; Maps; Photographs; Archeological Survey Reports
Cc: Cultural Resources Program Manager, Catoclin Mountain Park

The Maryland Historical Trust has determined
that this undertaking will have no adverse effect
on historic properties.

Beth Cole

Date

9/14/2021