

FINDING OF NO SIGNIFICANT IMPACT

Upgrade the Park Primary Electrical Distribution System – Phase III Catoctin Mountain Park Frederick County, Maryland

INTRODUCTION

The National Park Service (NPS) proposes to upgrade the electrical distribution system on the west side of Catoctin Mountain Park (CATO) in order to prevent power failures. A safe and reliable electrical distribution system is critical to maintain visitor services throughout the Park and ensure public safety. This is the third and final phase of a project that will upgrade the primary electrical distribution system throughout the park.

The purpose for taking action is to provide Park visitors and employees with access to a safe and reliable primary electrical distribution system in a way that protects the resources and values of Catoctin Mountain Park, and that:

- Improves the quality of the visitor experience, assuring continued visitor enjoyment of the park;
- Reduces impacts to park resources caused by frequent repairs of the current aging electrical distribution system ;
- Improves public safety by ensuring the primary electrical system meets current code requirements and is reliable.

The redesign of the primary electrical distribution system on the west side of the Park is needed because:

- The park's power system has been failing for the last 10 to 15 years with as many as 4-5 line failures per year and several failures involving disconnects and feed-through insulators;
- The underground cable has an exposed neutral and is affected by the soil pH in several areas of the park; and,
- The current orientation of the system makes fault location and repairs very difficult and costly.

As part of the overall planning effort, the NPS completed an Environmental Assessment (EA) that analyzed the potential impacts that would result from the alternatives considered for upgrading the electrical distribution system. This EA was prepared in accordance with the National Environmental Policy Act of 1969, as amended (NEPA), and its implementing regulations by the Council on Environmental Quality (CEQ) (40 CFR Parts 1500-1508), Director's Order #12 and Handbook, *Conservation Planning, Environmental Impact Analysis, and Decision-making, the National Historic Preservation Act (NHPA) Section 106,*

Environmental Quality Division (EQD), and NEPA Guidance for projects funded under the American Recovery and Reinvestment Act (ARRA) of 2009.

ISSUES

The primary concern of the park, as identified during the internal scoping meetings, is ensuring a safe and reliable electrical distribution system to maintain visitor services throughout the Park and ensure public safety. Other identified issues and concerns are listed below.

Visitor Use and Experience. Since the majority of new electrical lines proposed will be placed within Manahan Road, there will likely be periodic road closures and delays affecting visitors using this road. Construction noise may also adversely impact some visitors during this period.

Natural Resources. Activities associated with the installation of an electrical line will affect natural resources such as soils and vegetation. Loss of vegetative cover and soils erosion could also impact water quality. The frequent line failures also cause impacts to natural resources. Faults in the existing electric line are difficult to locate. Line repairs often require excavation in relatively undisturbed areas of the Park. These repairs also have the potential to impact soils, vegetation and water quality. Additionally, a portion of the existing line is currently located within the stream bed of Owens Creek. A moderate gradient stream, Owens Creek contains a healthy population of brook trout. Line repairs could require trenching in and around this wetland area.

Cultural Resources. The National Historic Preservation Act (NHPA; 16 USC 470 et seq.), NEPA, NPS 1916 Organic Act, the NPS 2006 Management Policies, DO-12 (Conservation Planning, Environmental Impact Analysis and Decision-making), and NPS-28 (Cultural Resources Management Guideline) require the consideration of impacts on any cultural resources that might be affected, and NHPA, in particular, on cultural resources either listed in, or eligible to be listed in, the National Register of Historic Places (NRHP). Cultural resources potentially impacted by this project include archeological resources and historic structures.

Health and Safety. The electrical system proposed for upgrade services the west side of the Park. This system supports visitor use areas such as the Owens Creek Campground, as well as critical infrastructure including wells, pump houses and the Park's Fire Cache. Frequent line failures potentially endanger the safety of CATO visitors and staff.

SELECTED ALTERNATIVE

Based on the analysis presented in the EA, the NPS has selected Alternative B – *Upgrade the Electrical Distribution System on the West Side of the Park*, the preferred alternative, for implementation. The selected alternative is described on pages 10-12 of the EA, and in the attached errata. This alternative will fully meet all the goals and objectives for upgrading the Park electrical system in a manner that protects the resources and values of Catocin Mountain Park.

Under this alternative, NPS will upgrade the electrical distribution system on the west side of the Park in order to prevent power failures. This upgrade will affect the existing primary

underground electrical service that currently feeds the Fire Cache, Poplar Grove Well Pump, Ike Smith Pump Station, and Owens Creek Campground. This includes providing new feeders in conduit and connecting to existing transformers at all the above locations. In addition to the new electrical lines in conduit, the upgrade will also replace or upgrade switches, fuses, meters, fault locators, manholes, equipment cabinets, transformers, and related support equipment. As a part of this project, a primary master meter will be added near the Park entrance and will provide Camp Misty Mount with a 20A fused disconnect.

The existing failing underground lines will be abandoned in place. The new electrical distribution system will be installed within disturbed areas, except for a small portion of new conduit that will be installed via direction drilling to a transformer servicing the Ike Smith Pump House. A new road will also be installed as part of this project. This road, approximately 156 feet in length, will provide access to the Ike Smith Pump House, and eliminate a stream crossing. The existing bridge that carries the present electrical conduit will be permanently removed to avoid further impacts to the stream channel and prevent the potential for power loss during high water events.

OTHER ALTERNATIVES CONSIDERED

ALTERNATIVE A – NO ACTION

Under Alternative A, *No Action*, The NPS would continue to make repairs to keep the existing electrical distribution system in service. It is likely that the Park would continue to experience frequent line failures resulting in costly repairs. As a result, excavation would be required to isolate the faults and make repairs. The current routing of the line does not always follow roadways or utility corridors. As a result, it is possible that in order to access line faults, resources such as soils and vegetation could be adversely impacted.

Additionally, disruptions to the electrical system can cause inconvenience to visitors through the loss of electrical power in public use areas. Prolonged disruptions could also affect water availability as this electrical service powers one of the Park water distribution systems.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The NPS is required to identify the environmentally preferable alternative in its NEPA documents for public review and comment. The NPS, in accordance with the Department of the Interior, Departmental Manual (516 DM 4.10) and the Council on Environmental Quality's (CEQ) *NEPA's Forty Most Asked Questions*, defines the environmentally preferable alternative that best promotes the national environmental policy expressed in NEPA (Section 101(b) (516 DM 4.10). In their *Forty Most Asked Questions*, CEQ further clarifies the identification of the environmentally preferable alternative, stating "Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources" (Q6a).

After completing the environmental analysis, the NPS identified Alternative B as the environmentally preferable alternative in this EA because it best meets the definition established by the CEQ. Alternative B provides the Park personnel and visitors with safe, reliable power with the least impact to the environment. Replacing the current failing underground lines with

new lines routed through conduit will reduce disturbances to soil and vegetation necessary to relocate the line and make repairs. The new system of underground conduit will also allow for future upgrades to be pulled through the existing conduit, reducing the need for additional soil disturbance.

MITIGATION MEASURES

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the NPS will ensure that the following protective measures are implemented as part of the action alternative. The NPS will implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are properly executed and are achieving their intended results.

- The Contractor shall provide for erosion and sediment control devices in accordance with Maryland Standards and Specifications.
- Grading will be limited to only those areas involved in current construction activities.
- Exposure of unprotected graded areas will be limited.
- Permanent stabilization of graded areas shall be done as soon as possible after construction.
- If permanent stabilization cannot be provided, temporary seeding and mulching shall be provided, at the direction of the National Park Service.
- To mitigate any impact on the visitor experience from delays experienced due to closures on Manahan Road, when possible these closures will be announced in advance.
- Signs indicating that there is road work ahead will be placed at the northern end of Manahan Road and at the intersection of Manahan Road and Park Central Road, to give visitors an opportunity to choose an alternate route through the Park.

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in 40 CFR § 1508.27, significance is determined by examining the following criteria:

1) Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an Environmental Impact Statement.

The actions proposed under the selected Alternative B, will not have significant adverse impacts. Adverse impacts to geology and soils or wetlands are expected to be short-term and negligible to minor. Any adverse impacts to vegetation, archeological resources or historic structures are expected to be long-term and negligible to minor. After construction is complete, long-term beneficial impacts to geology, soils, visitor use and experience and health and safety are expected.

2) The degree to which public health and safety are affected.

There are only beneficial effects to public health and safety expected. Beneficial, long-term impacts on Health and Safety could result from providing safe and reliable electrical distribution system. The proposed alternative would upgrade the primary electrical service to the Parks Ike Smith water distribution system and Fire Cache, both critical components of the Parks public health and safety infrastructure.

3) Any unique characteristics of the area (proximity to historic or cultural resources, wild and scenic rivers, ecologically critical areas, wetlands or floodplains, and so forth).

There are no unique characteristics of this area that would be negatively affected by the actions proposed in this project. There is one National Register structure and an eligible cultural landscape located in the proposed project area. The proposed actions were reviewed by the National Capital Regional Cultural Resource Team and Park Resources Management Staff. An assessment of “No Adverse Effect” to cultural resources was delivered. The project area also includes a stream crossing of the electric line through Owens Creek. To avoid any negative impacts to the stream bed, this line will be installed using directional drilling.

4) The degree to which impacts are likely to be highly controversial.

The impacts are not expected to be controversial. There were no public comments received during the review period of the environmental assessment.

5) The degree to which the potential impacts are highly uncertain or involve unique or unknown risks.

The potential impacts of utility work at Catoctin Mountain Park are well known. This is the third phase of electrical and sewer upgrades that have occurred park-wide. Mitigations identified in this document will ensure that any unknown potential impacts are minimized.

6) Whether the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration.

The proposed actions are not precedent setting. Any future proposed utility upgrades will require review to analyze the impacts specific to that particular project.

7) Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects. Significance cannot be avoided by terming an action temporary or breaking it down into small component parts.

The proposed action when added to the cumulative impact scenario will not contribute substantially to the overall impact levels for each impact topic analyzed.

8) The degree to which the action may adversely affect historic properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources.

This action will not adversely affect any historic or otherwise culturally significant resources. Consultation was conducted with National Park Service National Capital Region Cultural Resource Management staff. An assessment of “No Adverse Effect” was identified by the cultural resource staff. The actions qualified for streamlined review under the 2009 Programmatic Agreement (PA) between the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers. The proposed actions met the criteria for allowable maintenance or replacement of non-historic utility lines, transmission lines and fences.

9) The degree to which an action may adversely affect an endangered or threatened species or its habitat.

A Section 7 consultation was conducted with the U.S. Fish and Wildlife Service on June 12th, 2009. A response was received on July 8th, 2009 that confirmed except for occasional transient individuals, no federally proposed or listed endangered or threatened species are known to exist within the project impact areas.

10) Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

Based on the professional judgment of National Park Service employees, the actions proposed in Alternative B violate no federal, state, or local laws.

IMPAIRMENT OF PARK RESOURCES OR VALUES

The National Park Service Organic Act of 1916, and related laws, mandate that the units of the national park system must be managed in a way that leaves them “unimpaired for the enjoyment of future generations”. These laws give the NPS the management discretion to allow certain impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, so long as the impact does not constitute impairment of the affected resources and values. Director’s Order 12 states that environmental documents will evaluate and describe impacts that may constitute an impairment of park resources or values. In addition, the decision document will summarize impacts and whether or not such impacts may constitute an impairment of park resources or values. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

1. necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park,
2. key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
3. identified as a specific goal in the park’s general management plan or other relevant NPS planning documents.

The National Park Service has determined that implementation of the selected alternative will not constitute an impairment to Catoctin Mountain Park resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the Upgrade the Park

Primary Electrical Distribution System – Phase III Environmental Assessment, relevant scientific studies, and the professional judgment of the decision-makers guided by the direction in NPS Management Policies (2006). Although the selected alternative has some negative impacts, in all cases these adverse impacts are the result of actions taken to preserve and restore other park resources and values. Overall, the selected alternative results in benefits to park resources and values, opportunities for their enjoyment, and does not result in their impairment.

PUBLIC INVOLVEMENT

Catoctin Mountain Park conducted extensive scoping to ensure any impacts from the upgrade of the electrical system are minimized. Planning for this project began in 2005 when preliminary design drawings were created. Between 2005 and May 2009, the Park interdisciplinary project review team made adjustments to the design in order to ensure the least amount of environmental impact possible from implementing the action alternative.

Scoping was also conducted with other professionals within the National Park Service. Staff in the following offices provided comments on the proposed alternatives: National Capital Region (NCR) Maintenance and Design (Architecture and Engineering staff), NCR Cultural Resources, NCR Center for Urban Ecology and the Washington Office - Natural Resources Program Center.

Catoctin Mountain Park also emphasizes an ongoing communication with public and private organizations and agencies, public officials and individuals. The Environmental Assessment for the upgrade of the electrical distribution system at Catoctin Mountain Park was made available for public review and comment from June 30 through July 20th 2009. This project will be funded through the American Recovery and Reinvestment Act of 2009. NPS NEPA environmental compliance guidelines for ARRA projects allows for an expedited public comment of 20 days, as opposed to the normal minimum comment period of 30 days for an EA.

Press releases with information regarding the draft EA were sent to local media such as the Frederick News Post, Frederick Gazette and Thurmont Times. The final document was made available for review at Park Headquarters and Visitor Center, at local public libraries and online at the NPS Planning, Environment and Public Comment (PEPC) website parkplanning.nps.gov and the park's website www.nps.gov/cato. No Public comments were received on this Environmental Assessment.

The proposed action involves work in and around Owens Creek and the associated floodplain, and these activities are regulated by the State of Maryland. Consultation with the Maryland Department of the Environment Water Management Administration began in 2006. An Authorization to Proceed for this project was granted on April 29, 2009. A U.S. Army Corps of Engineers Permit was issued concurrently.

FINDING OF NO SIGNIFICANT IMPACT

The NPS has selected Alternative B, *Upgrade the electrical distribution system on the west side of the Park* for implementation. The selected alternative is described on pages 10-12 of the EA, and in the attached errata. The selected alternative will not constitute an action that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are negligible to moderate in intensity. Beneficial effects will occur in geology and soils, visitor use and experience, and health and safety. There are no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the selected alternative will not violate any federal, state, or local environmental protection law.

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

Recommended:



Mel Poole
Superintendent
Catoctin Mountain Park

7/21/09

Date

Approved:

ACTING



Margaret O'Dell
Regional Director
National Park Service, National Capital Region

7/23/09

Date

CATOCTIN MOUNTAIN PARK
UPGRADE THE PARK PRIMARY ELECTRICAL DISTRIBUTION
SYSTEM – PHASE III ENVIRONMENTAL ASSESSMENT

ERRATA

The following changes have been made to the *Upgrade the Park Primary Electrical Distribution System – Phase III Environmental Assessment* (EA) for Catoctin Mountain Park (July 2009) to incorporate a minor alteration in the proposed routing of an approximately 180 foot section of electrical conduit identified in Alternative B. In lieu of trenching 381 feet to install new utility service to the Ike Smith Pump House, the electrical conduit will be installed using directional drilling along a more direct route of 180 feet. Directional drilling will avoid any impacts to archeological resources and reduce the short-term impacts to geology, soils, and vegetation by eliminating approximately 2,160 square feet of ground disturbance from trenching activities.

Additions to the text are identified by underlines and deletions are marked by strikethrough unless otherwise noted.

1. Page 3 - IMPACT TOPICS, Geology and Soils

The following paragraph was revised to reflect the change in the proposed routing of the electrical line at the Ike Smith Pump House:

The proposed action alternative calls for trench excavation to install conduit. These actions would disturb a total of approximately 2 acres of soil, increasing the potential for soil erosion and loss of topsoil during construction. In addition, some grading and filling would be required. Soil disturbance would primarily occur within existing road or utility right of ways. However, approximately 1,560 square feet of soil would be disturbed in a previously undisturbed area. Additionally, to avoid impacts to a wetland area, ~~and stream channel, or archeological resources,~~ the proposed action calls for the use of directional drilling. Impacts to soil under the no action alternative are also likely as excavation would be required to find and repair faults as they occur in the existing electric line. As a result of potential impacts to soils and geology from the no action and proposed action alternative, soils and geologic resources are addressed as an impact topic in this EA.

2. Page 3 - IMPACT TOPICS, Vegetation

The following paragraph was revised to reflect the change in the proposed routing of the electrical line at the Ike Smith Pump House:

Actions ~~directly~~ related to the proposed installation of an electric line under the action alternative would require the clearing of approximately 1,560 square feet of second growth mixed deciduous forest and associated vegetation in order to create a new access road to the Ike Smith Pump House. As a result of impacts to vegetation that would occur from the proposed action alternative, vegetation is addressed as an impact topic in this EA.

ALTERNATIVES

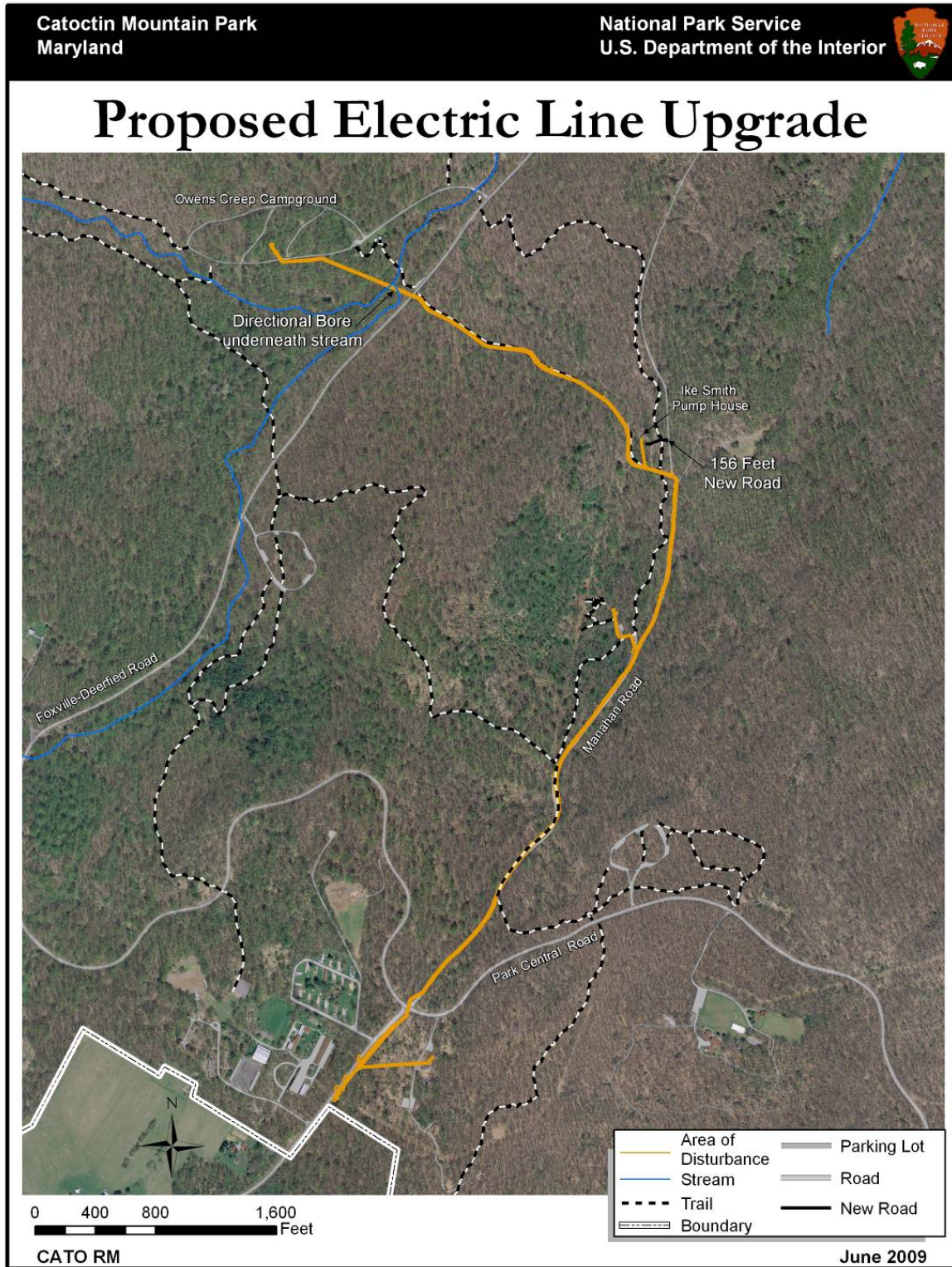
3. Page 10 - ALTERNATIVE B (NPS PREFERRED ALTERNATIVE) – UPGRADE THE ELECTRICAL DISTRIBUTION SYSTEM ON THE WEST SIDE OF THE PARK, second paragraph

The following paragraph was revised to reflect the change in the proposed routing of the electrical line at the Ike Smith Pump House:

The existing failing underground lines would be abandoned in place. The new electrical distribution system would be installed within disturbed areas, except for a small portion of 180 linear feet for new road, ~~where the conduit would be placed~~ conduit that will be installed via direction drilling to a transformer servicing the Ike Smith Pump House. A new road will also be installed as part of this project. This road, approximately 156 feet in length, is proposed in order to provide access to the Ike Smith Pump House, and eliminate a stream crossing. The existing bridge that carries the present electrical conduit would be permanently removed to avoid further impacts to the stream channel and prevent the potential for power loss during high water events. ~~The new electrical feed would be placed within the prism of the new road.~~

4. Figure 1, Page 11

The following figure was revised to reflect the change in the proposed routing of the electrical conduit to the Ike Smith Pump House:



AFFECTED ENVIRONMENT/ENVIRONMENTAL CONSEQUENCES

5. Page 22 - IMPAIRMENT ANALYSIS, IMPACT TOPICS, Geology and Soils, Alternative B (NPS Preferred) – Upgrade the electrical distribution system on the west side of the Park, first, second, and third paragraphs

The following paragraphs were revised to reflect the change in the proposed routing of the electrical conduit:

Approximately ~~9028~~ 8812 linear feet of trenching would be required to install underground conduit under Alternative B. This excavation would increase the potential for soil loss in the disturbance zone. The disturbance zone would be approximately 5 feet on either side of the trench centerline, for a typical width of 10 feet. Therefore the total impact area for this project would be ~~90,280~~ 88,120 square feet (roughly two acres). This is less than .03 percent of the total park. Contractors completing the work for this project would be required to implement erosion and sediment control in accordance with Maryland standards and actual soil loss is expected to be negligible. Soil compaction is also a concern as heavy equipment would be utilized to complete this work. However, the majority of the construction would take place along Manahan Road, the road shoulder, and existing utility corridors. These areas have been previously disturbed and no further impacts are anticipated from the actions proposed in Alternative B.

A new road to the Ike Smith Pumphouse is proposed under Alternative B (Figure 2). This road would carry periodic Park maintenance vehicle traffic ~~and would also serve as the utility corridor for the electrical upgrade.~~ This new road would be 156 feet in length, and would impact approximately 1,560 square feet of soil. Since the area of disturbance is small, negligible impacts are expected on Park soils. As in the disturbed areas, erosion and sediment control would be in place during construction in accordance with Maryland standards. After construction, a turf grid paving system would be installed to prevent soil loss and compaction. The turf grid system allows the weight of vehicles to be born by the paver grid while voids in the grid allow water to drain and vegetation to grow. This new road would divert traffic to the Ike Smith Pump House from the adjacent fire road, which currently suffers from soil loss, to a new stable and permeable road surface.

This alternative also proposes directional drilling to avoid any impacts to Owens Creek or a historic dump site located in undisturbed second growth forest at the Ike Smith Pump House. The original electrical distribution line across Owens Creek was installed by trenching in the creek bottom. Alternative B calls for boring six feet under the stream bed. The boring would likely encounter bedrock, but the impacts to Park geology are expected to be negligible (Denniston, pers. comm. 2009). The existing electrical distribution line servicing Ike Smith Pump House crosses a bridge that is near failure. Alternative B proposes a new routing that would avoid a stream crossing and require the shortest run possible of new conduit. This approximately 180 foot section of conduit will would be installed via directional drilling, which would allow electrical conduit to be placed a minimum of four feet underground. This placement would reduce the overall amount of trenching necessary and minimize any adverse impacts to soils from construction activities. Impacts to Park geology are also expected to be negligible.

6. Figure 2, Page 24

The following figure was revised to reflect the change in the proposed routing of the electrical conduit to the Ike Smith Pump House:



7. Page 25 - IMPAIRMENT ANALYSIS, IMPACT TOPICS, Vegetation, Alternative B (NPS Preferred) – Upgrade the electrical distribution system on the west side of the Park, first paragraph

The following paragraph was revised to reflect the change in the proposed routing of the electrical conduit to the Ike Smith Pump House:

A new road to the Ike Smith Pump House is proposed under Alternative B. This road would carry periodic vehicular traffic ~~and would also serve as the utility corridor for the electrical upgrade~~. This new road would be 156 feet in length, and would impact approximately 1,560 square feet of vegetation. On May 22, 2009 Park staff surveyed the proposed area of disturbance and inventoried the herbaceous vegetation present (Table 3).

8. Page 29 - IMPAIRMENT ANALYSIS, IMPACT TOPICS, Archeological Resources, Alternative B (NPS Preferred) – Upgrade the electrical distribution system on the west side of the Park, first, second, and third paragraphs

The following paragraphs were revised to reflect the change in the proposed routing of the electrical conduit to the Ike Smith Pump House:

The proposed alternative calls for installing a utility line and new road ~~and utility corridor near to service~~ the Ike Smith Pump House. Since this area does not show recent evidence of human disturbance, a Phase I archeological survey was conducted. Two shovel tests were placed along a transect considered for routing of the ~~new electric line and road~~. One shovel test uncovered cultural materials. These artifacts included bottle fragments, container and jar glass shards, a glass chimney (lighting) fragment, brick fragments, an undecorated whiteware fragment, a molded and gilded porcelain fragment, machine cut nails and bone. All were recovered from a 0.5-foot thick fill deposit overlying sterile subsoil. A walkover survey of the adjacent area identified a dump area containing brick halves, shoe leather, bottle and jar glass shards, an unglazed redware drainpipe, an unglazed redware crock fragment, and a large furniture spring. A brick half with a partial name (“...EWOOD”) was also found nearby. This is probably from the Baltimore Brick Company (c. 1915-1926), which produced a brick marked “HOMEWOOD”.

At this time, it is unclear whether these objects are associated with the Ike Smith farmstead, which was purchased as part of the Catoctin Recreational Demonstration Project in April 1937, or from an unrelated twentieth century dumping episode. The lack of diagnostic artifacts and the narrow scope of the survey make it difficult to distinguish between the two. However, the presence of machine cut nails and chimney (lighting) glass may indicate that this is part of an older site, possibly Ike Smith’s farmstead.

In order to prevent any impacts to the archeological site discovered, a new routing of the road ~~and electric line corridor~~ was selected. Shovel test pits in this area revealed no additional archeological findings and the steeper slope of the area has little potential for significant archeological resources. The new electrical line servicing the Ike Smith Pump House will be placed along a more direct route that passes near the area containing the archeological site. The conduit would be installed using directional drilling to avoid any possible archeological resources between the ground surface and the minimum directional drilling depth at four feet.

COORDINATION AND CONSULTATION

9. Page 33 -COORDINATION AND CONSULTATION, second paragraph

The following paragraph was revised to reflect further consultation that was conducted to assess the impact on cultural resources of changing the proposed routing of the electrical line at the Ike Smith Pump House. After consultation, it was found that the change had no impact on the “No Adverse Effect” finding and that the action still qualified for streamlined review.

All consultations mandated in Section 106 of the National Historic Preservation Act of 1966, occurred as part of the development of this EA, and subsequent errata. There is one National Register structure and an eligible cultural landscape historic structure located in the proposed project area. A Phase I archaeological survey of the Ike Smith Area, conducted as part of the EA and Section 106 process, identified a possible historic dump site in the area. As a result of this finding, a new route was proposed to avoid any impacts to archeological resources. The actions proposed in these documents were reviewed by the National Capital Regional Cultural Resource Team and Park Resources Management Staff. An assessment of “No Adverse Effect” to cultural resources as a result of the proposed upgrade of the electrical distribution system was delivered. The actions qualified for streamlined review under the programmatic agreement among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers. The proposed actions met the criteria for allowable maintenance or replacement of non-historic utility lines, transmission lines and fences.