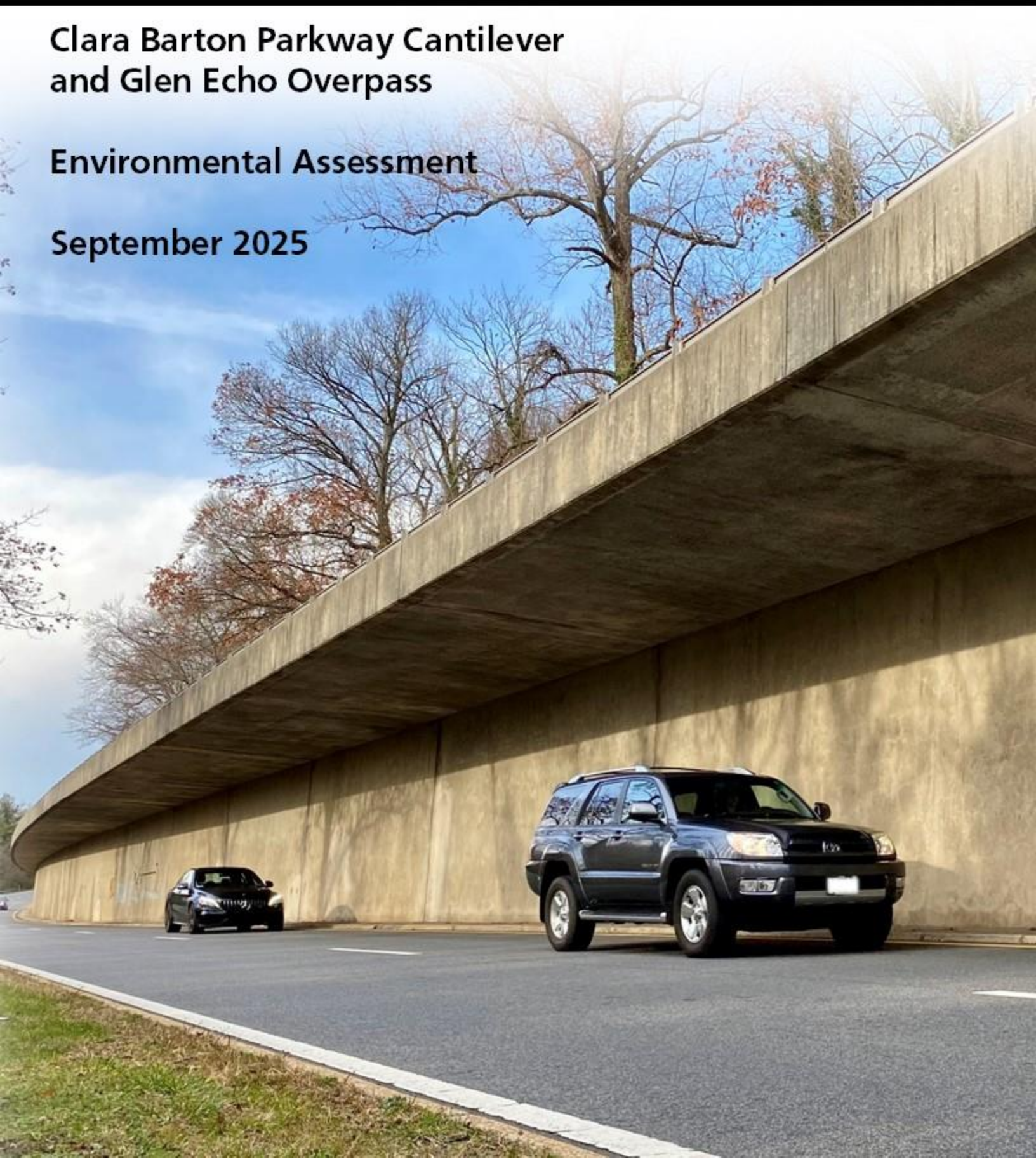




Clara Barton Parkway Cantilever and Glen Echo Overpass

Environmental Assessment

September 2025





As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under US administration.

NOTE TO REVIEWERS

Comments on this document may be submitted electronically at: [Clara Barton Parkway Cantilever \(nps.gov\)](https://www.nps.gov/clarabartonparkwaycantilever)

You may also mail written comments postmarked by October 9, 2025, to:

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

Before including personal identifying information in your comment, you should be aware that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

ON THE COVER

Photo of eastbound Clara Barton Parkway and the underside of the cantilevered westbound lane.

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ACRONYMS AND ABBREVIATIONS

ABA	Architectural Barriers Act
ACHP	Advisory Council on Historic Preservation
ADA	Americans with Disabilities Act
ADT	Annual Daily Traffic
APE	Area of Potential Effects
BMP	Best Management Practices
C&O	Chesapeake and Ohio
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
D-B	Design-Build
dB(A)	A-weighted decibels
DOT	Department of Transportation
EA	Environmental Assessment
EB	eastbound
ESC	Erosion and Sediment Control
FHWA	Federal Highway Administration
GW Parkway	George Washington Memorial Parkway
HAER	Historic American Engineering Record
M-NCPPC	Maryland-National Capital Park and Planning Commission
MCDEP	Montgomery County Department of Environmental Protection
MCDOT	Montgomery County Department of Transportation
MDE	Maryland Department of the Environment
MD DNR	Maryland Department of Natural Resources
MHT	Maryland Historical Trust
MOT	Maintenance of Traffic
mph	miles per hour
National Register	National Register of Historic Places
NCPC	National Capital Planning Commission
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act
NPS	National Park Service
PEPC	Planning, Environment and Public Comment
PROWAG	Public Right-of-Way Accessibility Guidelines
SHA	State Highway Administration
SWM	Stormwater Management
USC	United States Code
USFWS	US Fish and Wildlife Service
Volpe Center	Volpe National Transportation Systems Center
WB	westbound

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CHAPTER 1: PURPOSE AND NEED

PROPOSED ACTION

The National Park Service (NPS) is proposing to replace the cantilever structure and reconstruct the adjacent retaining walls on Clara Barton Parkway between Cabin John Parkway and the Macarthur Boulevard exit ramp in Montgomery County, Maryland. The NPS is also proposing to demolish an associated feature, the Glen Echo Overpass. **Figure 1** presents the location of the Clara Barton Parkway Cantilever and Glen Echo Overpass Project (the Project).

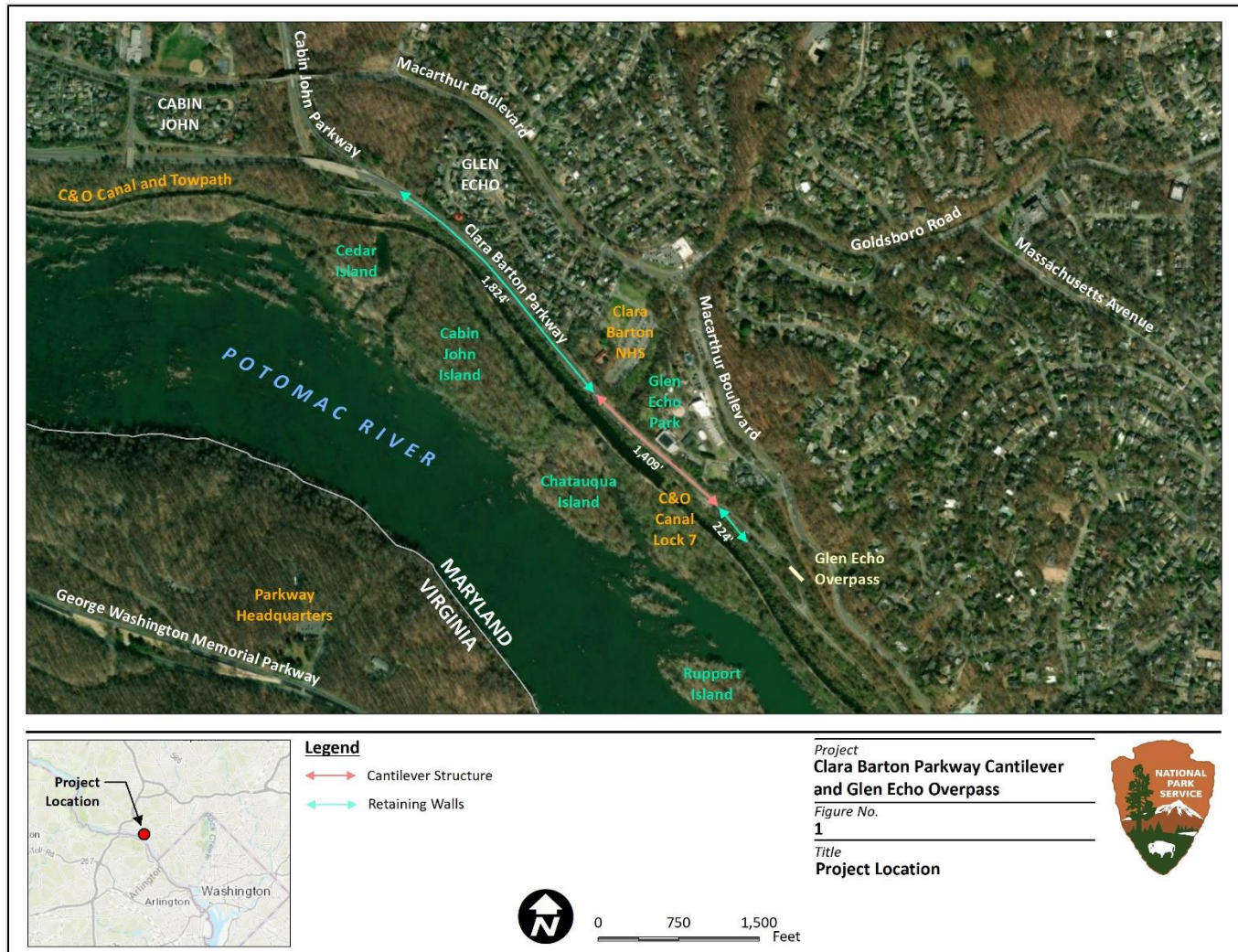


Figure 1. Location of the Clara Barton Parkway Cantilever and Glen Echo Overpass

Clara Barton Parkway, a 6.8-mile scenic parkway managed by the NPS as part of the George Washington Memorial Parkway (GW Parkway), spans 280 acres along the Maryland side of the Potomac River, from Carderock to Chain Bridge in Washington, DC. Originally planned as part of a larger parkway system flanking both sides of the river, the Clara Barton segment was the last built and the only one constructed in Maryland. Its eastern third, built along a former streetcar right-of-way, differs in character from the rest of Clara Barton Parkway due to delays in land acquisition and changes in design. Named in 1989 to honor Clara Barton, the Parkway reflects both the ambition of the NPS to create a unified scenic and commemorative route and the public opposition that halted some of its planned extensions, such as the Palisades Parkway (Kelsch P et al. 2015).

Cantilever Structure and Retaining Walls

The Maryland segment of Clara Barton Parkway was constructed between 1957 and 1965. Designers used retaining walls and the cantilever structure to fit Clara Barton Parkway within the restrictive terrain between the Chesapeake and Ohio Canal National Historical Park (C&O Canal NHP) and the bluffs leading up to Glen Echo and Brookmont. Clara Barton Parkway focuses on internal views to historic structures of the C&O Canal NHP and the Washington Aqueduct that represent the history of the landscape as an infrastructural corridor, instead of panoramic views like those seen from GW Parkway in Virginia.

Glen Echo Overpass

The Glen Echo Overpass was built in 1961 as part of the later abandoned plan to expand Clara Barton Parkway to four travel lanes inbound into Washington, DC. The structure has remained unused by traffic since its completion as the Clara Barton Parkway expansion never came to fruition. The bridge crosses over the westbound (WB) lane of Clara Barton Parkway but is unconnected to the surrounding roadway network.

The NPS prepared this Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [USC] 4321 et seq.); the US Department of the Interior Handbook of National Environmental Policy Act Implementing Procedures, Department of the Interior NEPA regulations (43 Code of Federal Regulations [CFR] Part 46); and NPS Director's Order 12: Conservation Planning, Environmental Impact Analysis and Decision-making and its accompanying NPS NEPA Handbook.¹

PURPOSE OF AND NEED FOR ACTION

The purpose of the proposed Project is to replace the deteriorating cantilever structure and reconstruct the associated retaining walls, and demolish the deteriorating overpass, to ensure the safety of the travelling public and avoid long-term traffic impacts.

The Project is needed because the NPS last rehabilitated the cantilever structure and associated retaining walls in 1992 and performed spot repairs in 2020. The Federal Highway Administration (FHWA) conducted an in-depth special study of the concrete cantilever structure in 2020 that indicated the cantilever structure is exhibiting widespread deterioration. Corrosion of the reinforcing steel has begun and is likely to worsen. The FHWA estimated the useful remaining service life of the structure was approximately five years from completion of the study. In 2023, a comprehensive study conducted on the adjacent retaining walls revealed they are also nearing the end of their useful service life. The FHWA has recommended action be taken since subsequent inspections have confirmed the timelines of the estimated remaining service lives of the structures. Otherwise, widespread corrosion of the steel and deterioration of the concrete will reduce the load-bearing capacity of the cantilever structure and severely impact its structural integrity. The NPS will be required to implement weight restrictions on the cantilevered WB lane of Clara Barton Parkway (**Figure 2**, top) due to its reduced load-bearing capacity if action is not taken. Shortly thereafter, lane closures will be necessary for public safety on the cantilevered WB lane and on the eastbound (EB) lane below the cantilever structure (**Figure 2**, bottom), which is at risk from falling concrete debris. This would cause substantial traffic impacts, as approximately 40,000 vehicles use Clara Barton Parkway daily, making it an essential thoroughfare in the area.

¹ Executive Order 14154, *Unleashing American Energy* (Jan. 20, 2025), and a Presidential Memorandum, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity* (Jan. 21, 2025), require the Department to strictly adhere to the National Environmental Policy Act (NEPA), 42 USC §§ 4321 et seq. Further, such Order and Memorandum repeal Executive Orders 12898 (Feb. 11, 1994) and 14096 (Apr. 21, 2023). Because Executive Orders 12898 and 14096 have been repealed, complying with such Orders is a legal impossibility. The National Park Service verifies that it has complied with the requirements of NEPA, including the Department's regulations and procedures implementing NEPA in the Department's Handbook and 43 CFR Part 46, consistent with the President's January 2025 Order and Memorandum. The National Park Service has also voluntarily considered the Council on Environmental Quality's rescinded regulations implementing NEPA, previously found at 40 CFR Parts 1500–1508, as guidance to the extent appropriate and consistent with the requirements of NEPA and Executive Order 14154.

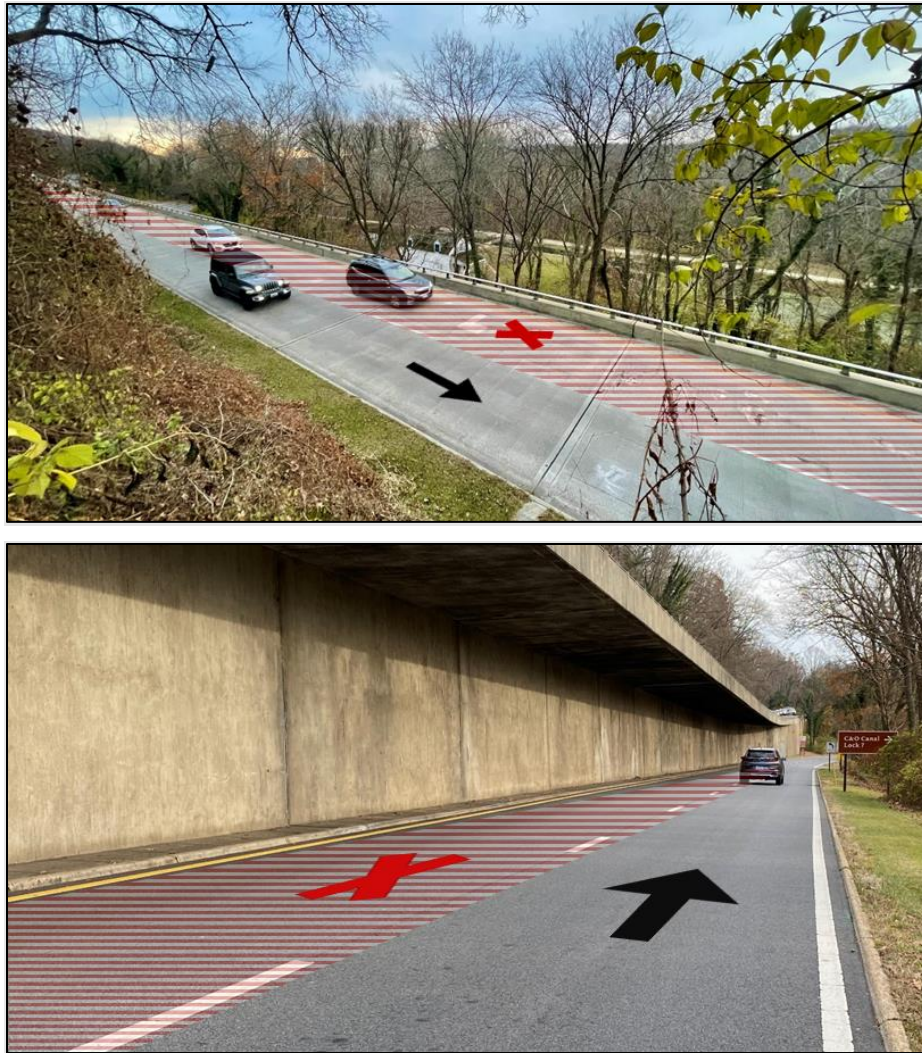


Figure 2. Cantilever Structure from westbound (top) and eastbound (bottom) Clara Barton Parkway, showing potential Lane Closures if Action is not taken

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

ISSUES AND IMPACT TOPICS RETAINED FOR DETAILED ANALYSIS

During the planning process, the NPS identified specific impact topics as critical to this project area. Impact topics are a means of organizing the discussion of issues and analysis of impacts. In the context of NEPA reviews, issues can be problems, concerns, conflicts, obstacles, or benefits that would result if the proposed action or alternatives, including the no-action alternative, are implemented. During the scoping process, impact topics were either retained for further analysis or dismissed from further consideration. This section provides an overview of

the impact topics that were retained for analysis. A topic was retained for analysis if it met one or more of the following conditions:

- the environmental impacts associated with the issue are central to the proposal or of critical importance;
- a detailed analysis of environmental impacts related to the issue is necessary to make a reasoned choice between alternatives;
- the environmental impacts associated with the issue are a big point of contention among the public or other agencies; or
- there are potentially significant impacts to resources associated with the issue.

These issues and concerns are included in the impact topics that are discussed in the “Affected Environment and Environmental Consequences” chapter of this EA.

Visitor and Community Use and Experience, including Traffic

The Project could result in unavoidable traffic impacts both EB and WB during peak travel periods from lane closures during construction. However, similar traffic impacts would be expected indefinitely from the closure of travel lanes (see **Figure 2**) under the no action alternative if the Project is not implemented because of widespread corrosion of the steel and deterioration of the concrete that will reduce the load-bearing capacity of the cantilever structure and severely impact its structural integrity. Additionally, construction-related noise is expected to be noticeable in neighboring communities. These issues are analyzed under the *Visitor and Community Use and Experience, including Traffic* impact topic.

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

Clara Barton Parkway is listed in the National Register of Historic Places (National Register) and there are several additional historic structures and districts adjacent to or potentially within view of the Parkway. Clara Barton Parkway is also an NPS-designated cultural landscape and is nationally significant for its associations with the broader planning of Washington, DC, its role in the conservation and protection of the Potomac River Gorge, and its unique landscape architecture and engineering. The Project would require construction activities that would replace, conceal, or modify aspects of the Clara Barton Parkway that make it significant, and may result in potential visual and construction-related impacts to other historic properties within the Area of Potential Effect (APE). These issues are analyzed under the *Historic Structures and Districts* and *Clara Barton Parkway Cultural Landscape* impact topics.

IMPACT TOPICS DISMISSED FROM DETAILED ANALYSIS

The NPS has dismissed the following issues and associated impact topics from detailed analysis for the reasons provided. An impact topic was initially considered but dismissed from detailed analysis if it did not contribute to the factors outlined above. This section will provide brief descriptions of the issues and concerns determined not to warrant further consideration, as well as a summary justification for the dismissal of each issue.

Water Resources

The Project would require ground disturbance during construction. While the construction would not occur within a regulated floodplain or cause impacts to wetlands, it is important for NPS to ensure that erosion is minimized, and sediments are prevented from being transported into the C&O Canal or other waterbodies. As such, NPS would prepare an Erosion and Sediment Control (ESC) Plan and a Stormwater Management (SWM) Plan for review and approval from the Maryland Department of the Environment (MDE). The ESC and SWM Plans would incorporate selected principles and practices into construction in accordance with Maryland’s 2011 Standards and Specifications for Soil Erosion and Sediment Control, the publication entitled Maryland Stormwater Management and Erosion and Sediment Control Guidelines for State and Federal Projects dated February 2015, and Technical Memorandum #10: Stormwater Management Overview for State and Federal Projects dated July 18, 2018. ESCs

may include silt fencing, stabilized construction entrances, temporary sediment traps, or other best management practices (BMP). Properly implemented and maintained ESC and SWM BMPs would result in minimal sediment transport offsite and ensure water quality is protected from erosion and stormwater runoff. The NPS has therefore dismissed *Water Resources* from further analysis in this EA.

Threatened and Endangered Species

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

Additionally, in a letter dated March 24, 2025, the Maryland Department of Natural Resources (MD DNR) Wildlife and Heritage Service stated that it has no official records for state- or federally listed, candidate, proposed, or rare plant or animal species within the Project area. As a result, MD DNR had no specific concerns regarding potential impacts to such species or recommendations for protection measures. The NPS has therefore dismissed *Threatened and Endangered Species* from further analysis in this EA.

Vegetation

The Project would require removal of trees and understory growth during construction. Vegetation removal would primarily be caused by excavation of the hillside along WB Clara Barton Parkway to accommodate a shift in the road alignment, a drainage ditch, and rockfall area. Vegetation removal would also be necessary to reconstruct the retaining wall south of the cantilever structure where tree and understory growth have established. Most of the trees to be removed include a variety of small to medium diameter deciduous species, many of which have been overtaken by invasive vines.

The NPS would conduct a tree survey within the limits of disturbance of the Project once detailed design plans have been developed. Trees that cannot be avoided would be replaced in accordance with the National Capital Planning Commission's (NCPC) Tree Preservation and Replacement Policy. Since excavations are expected to expose bedrock where attempting to plant trees would not be practical, NPS would search for other locations along Clara Barton Parkway where trees could be planted that reflect the native plant communities and the cultural landscape character of the Parkway. Since tree removal would be mitigated with replacement trees at a ratio determined using NCPC's Tree Preservation and Replacement Resource Guide (2020), the NPS has dismissed *Vegetation* from further analysis in this EA. NCPC's tree replacement policy and NPS tree replacement activities would be communicated as part of community stakeholder engagement during design and construction.

Archeological Resources

There are no known archeological resources in the APE. The area of direct effects, where ground-disturbing activities would occur, is within the terrain that saw extensive grading for the construction of Clara Barton Parkway, and therefore the soils are heavily disturbed, and no intact archeological resources are expected to be present. In their response to consultation initiation, Maryland Historical Trust (MHT) recommended that no archeological investigations are necessary and the NPS concurred. Therefore, no further historic property identification efforts for archeological resources will be conducted and *Archeological Resources* has been dismissed from further analysis in this EA.

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CHAPTER 2: ALTERNATIVES

This section of the EA describes the no-action alternative and the proposed action for the Project. The description and evaluation of the no action alternative provides a baseline to which action alternatives can be compared. This EA evaluates two alternatives: “Alternative A: No Action” and “Alternative B: Clara Barton Parkway Cantilever and Glen Echo Overpass Project.” The elements of these alternatives are described in the following sections. Impacts associated with the alternatives are described in “Chapter 3: Affected Environment and Environmental Consequences.”

ALTERNATIVE A: NO ACTION

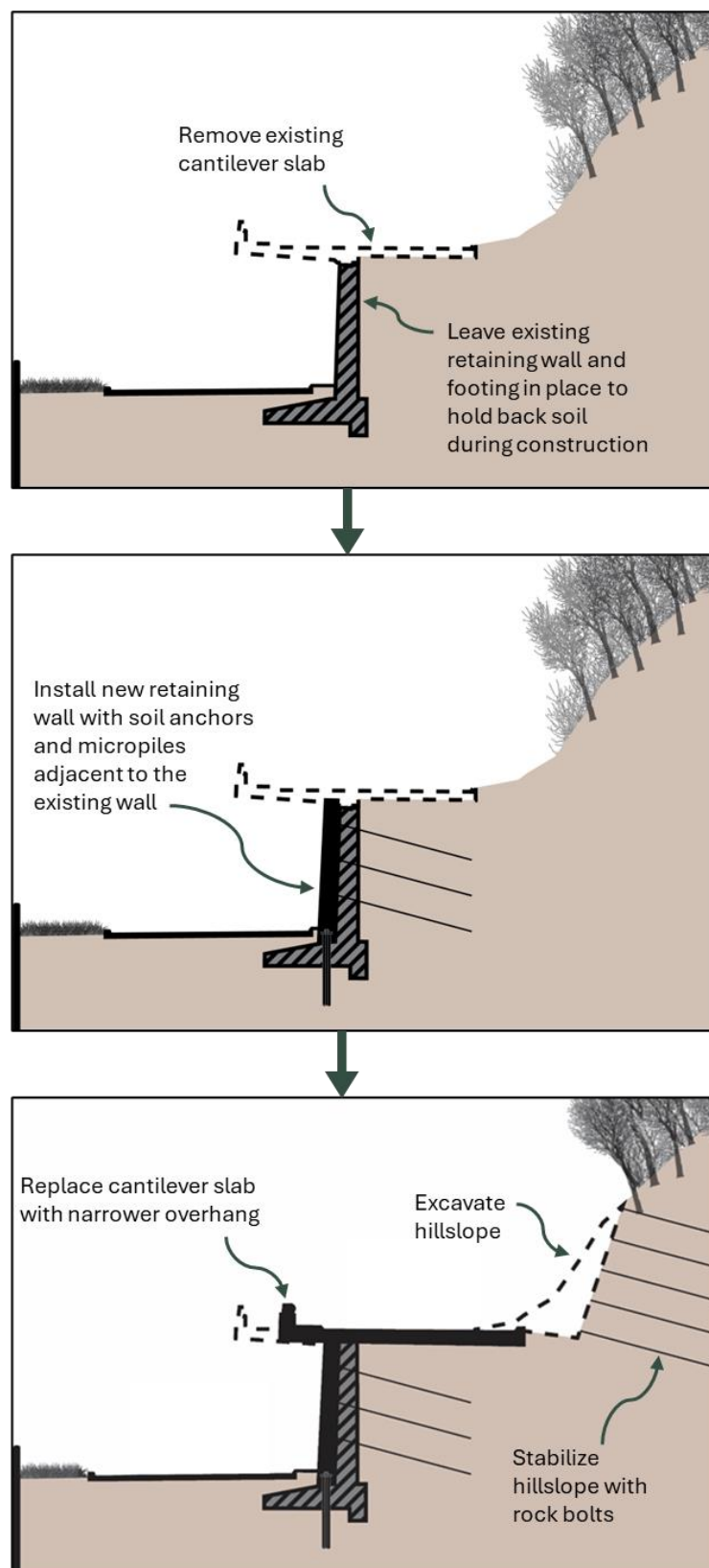
Under the no action alternative, the Clara Barton Parkway cantilever structure and associated retaining walls will continue to deteriorate. The NPS will be required to implement weight restrictions, prohibiting heavy vehicles from using the cantilevered WB lane (**Figure 2**, top) of Clara Barton Parkway due to its reduced load-bearing capacity if no action is taken. Weight restrictions would require ongoing community outreach, enforcement, and signage. Shortly thereafter, lane closures will be necessary indefinitely for public safety on the cantilevered WB lane (**Figure 2**, top) and the EB lane below (**Figure 2**, bottom) due to the risk of concrete debris falling. Weight restrictions are expected to be necessary as early as 2026; however, subsequent regular FHWA inspections would determine the timeline and level of intervention required. The FHWA would continue to regularly inspect the cantilever structure and emergency actions would be performed, as needed, to ensure the safety of the traveling public on Clara Barton Parkway. Similarly, the Glen Echo Overpass would remain unused under the no action alternative, while requiring regular inspections and maintenance to ensure the safety of the public traveling underneath the overpass.

ALTERNATIVE B: CLARA BARTON PARKWAY CANTILEVER AND GLEN ECHO OVERPASS PROJECT (PROPOSED ACTION AND PREFERRED ALTERNATIVE)

Cantilever Structure and Retaining Walls

The NPS proposes to replace the existing 1,409-foot cantilever structure on Clara Barton Parkway. The replacement includes removing the existing cantilevered slab while keeping the existing retaining wall and footing in place to hold back soil during construction (**Figure 3**, top). The NPS would install a new retaining wall adjacent to the existing structure using soil anchors and reinforcing steel posts called micropiles after removing the existing cantilever structure (**Figure 3**, middle). Using this method, the new retaining wall would bear the load of the structure entirely, relieving the old wall of any structural burden. Afterward, the NPS would excavate up to 12 feet into the hillside adjacent to the WB lanes of Clara Barton Parkway. The NPS would then install a cantilevered concrete slab on a new alignment that shifts the WB lanes north into the excavated hillside. The alignment shift would result in an overhang approximately six feet narrower than the existing structure at its widest section. The remaining excavated area would be used to establish a drainage ditch and rock fall area for traffic safety. The NPS would then install rock bolts into the hillside to stabilize the newly exposed bedrock (**Figure 3**, bottom). The NPS would also install new safety railings that meet current safety hardware standards and mountable curbs, and roadway signage would be replaced or reinstalled, as needed, to complete the cantilever structure replacement.

The NPS proposes to reconstruct 2,048 feet of existing concrete retaining walls along Clara Barton Parkway associated with the cantilever structure, including 1,824 feet of wall west of the structure (**Figure 4**, top), and 224 feet of wall to the east of the structure (**Figure 4**, bottom). The NPS would use a similar approach to the cantilever structure that would involve constructing the new retaining walls adjacent to the existing walls. The NPS would also install new safety railings on the retaining walls that meet current safety hardware standards.



**Figure 3. Conceptual Schematic of the
Proposed Cantilever Structure Replacement**



Figure 4. Retaining Walls west (top) and east (bottom) of the Cantilever Structure
(Image Capture: Aug 2023 © 2025 Google)

Glen Echo Overpass

The NPS would also demolish the unused Glen Echo Overpass as part of the proposed action. The Glen Echo Overpass consists of reinforced concrete (**Figure 5, left**) and an asphalt surface with metal safety railings (**Figure 5, right**). Demolition would first involve placing a protective material on top of the asphalt road surface underneath the overpass to prevent damage during bridge demolition. Then, excavators would remove the bridge deck and overhangs, girders/piers, and abutments by demolishing the concrete structure into smaller pieces to be transported offsite for proper disposal. Minimal site restoration would be necessary after the bridge is removed since it is anchored into exposed bedrock with limited opportunities to install trees and shrubs at the location.

ALTERNATIVES CONSIDERED BUT DISMISSED FROM FURTHER CONSIDERATION

The NPS evaluated one cantilever structure rehabilitation and several replacement alternatives during project planning considering factors such as resiliency, traffic delay, neighbor noise, construction duration, maintenance needs, natural and cultural resources, and initial and life cycle costs.

The NPS dismissed rehabilitation from further consideration because it would require more frequent maintenance than replacement and would have a life cycle cost approximately twice that of the Proposed Action. The in-kind replacement alternative, which would involve constructing a soldier pile wall to hold back soil while the NPS removes the existing retaining wall and footing and prepares the site for a new structure, was also dismissed from further consideration because it would have an anticipated construction duration approximately 180 days longer and cost approximately \$24 million dollars more to construct as compared to the Proposed Action. The in-kind replacement alternative would also only allow for one travel lane to be maintained during construction that would alternate directions to accommodate peak traffic, while the Proposed Action would allow for two travel lanes to remain open to traffic for most of construction.

The NPS also considered public suggestions to rehabilitate the Glen Echo Overpass for use as an overlook, pedestrian/bicycle connection, or traffic relief, but dismissed the idea due to major challenges. Significant grade differences, environmental and topographical constraints, costly infrastructure needs, Americans with Disabilities

Act (ADA) compliance requirements, and lack of funding make rehabilitating the Glen Echo Overpass impractical. Nearby alternative pedestrian connections already exist and using the overpass solely as an overlook would require disproportionate investment for limited scenic value. Rehabilitating the overpass to relieve traffic would also cause extensive impacts to the Clara Barton Parkway Cultural Landscape.

More details on the alternatives that were dismissed from further consideration prior to developing the EA are provided in **Appendix A**.

The NPS has identified Alternative B, the proposed action described in the following section, as the preferred alternative. The preferred alternative is the alternative that “would best accomplish the purpose and need of the proposed action while fulfilling [the NPS] statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other factors” (43 CFR 46.420(d)). The NPS has identified Alternative B as the preferred alternative because deterioration will continue, causing NPS to impose weight restrictions on Clara Barton Parkway as early as 2026 and indefinite lane closures soon after if no action is taken to rehabilitate or replace the cantilever structure.



Figure 5. Glen Echo Overpass from Clara Barton Parkway (left) and Bridge Surface (right)

MITIGATION MEASURES

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potential adverse impacts to resources under the jurisdiction of the NPS or because of an NPS decision. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the following proposed mitigation measures will allow the NPS to meet its conservation mandates as required by the Organic Act (54 USC 100101) and as further detailed in NPS Management Policies, the National Historic Preservation Act (NHPA), the Endangered Species Act (16 USC 1531 et seq.), and Executive Order 13112, as amended by Executive Order 13751 (December 8, 2016). The NPS would also implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are properly implemented and are achieving their intended results.

Visitor and Community Use and Experience, including Traffic

- Implement detailed Maintenance of Traffic (MOT) Plans that reduce temporary construction-related traffic impacts on Clara Barton Parkway, MacArthur Boulevard, and other roadways.
- Coordinate MOT with the Maryland Department of Transportation (MDOT) – State Highway Administration (SHA), the Montgomery County Department of Transportation (MCDOT), the town of Glen Echo, and other stakeholders, as applicable.

- Provide advance notice of construction schedule or traffic patterns changes, as well as recommendations for alternative routes to avoid delays on Clara Barton Parkway.
- Adhere to Montgomery County's Noise Control Ordinance at Chapter 31B of the County Code, including preparing a Noise Suppression Plan.
- Implement a noise monitoring and resource protection program to minimize noise disturbance at Glen Echo Park and surrounding areas, including baseline and real-time construction noise monitoring; work schedule adjustments, such as avoiding evening, nighttime, and weekend work, and coordinating construction schedules with community event calendars; and stakeholder and community coordination and engagement before and during construction.

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

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

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CHAPTER 3: AFFECTED ENVIRONMENT AND ENVIRONMENT CONSEQUENCES

This chapter describes the existing condition of resources retained for analysis in and surrounding the Project area that could be impacted by implementing this Project. These conditions serve as a baseline for analyzing how these resources could be impacted by each alternative. This chapter also provides an analysis of the potential environmental consequences of implementing the Project organized by impact topic. The project team considers these topics the key issues that could inform the NPS decision on how to proceed with this Project.

VISITOR AND COMMUNITY USE AND EXPERIENCE, INCLUDING TRAFFIC

Affected Environment

Clara Barton Parkway follows the northern bank of the Potomac River, extending approximately seven miles between MacArthur Boulevard in Carderock, Maryland, east to Canal Road at Chain Bridge in Washington, DC. Due to its location within a restrictive landscape, users of Clara Barton Parkway are afforded intimate, internal views of the locks and lock houses of the C&O Canal NHP, a view of the Union Arch Bridge of the Washington Aqueduct, and a feeling of being enveloped by woodlands, instead of sweeping views of the Potomac River like on GW Parkway in Virginia.

Within the limits of the Project, the Parkway provides access to adjoining residential communities of Cabin John, Glen Echo, and Brookmont by way of MacArthur Boulevard, as well as key historic and cultural landmarks that include C&O Canal NHP, the Clara Barton National Historic Site, Glen Echo Park, and the Washington Aqueduct. Direct access to the C&O Canal towpath, a popular multi-use trail for hiking, biking, and running, and Lock #7 and the Lock Keeper's House, is provided at a parking area along Clara Barton Parkway EB. The parking area includes eight standard parking spaces and one accessible parking space. Clara Barton Parkway is devoid of commercial services such as gas stations, restaurants, or retail, thereby preserving its quiet, undeveloped character and emphasizing its role as a scenic and historically significant parkway. Overall, Clara Barton Parkway offers a unique blend of natural landscapes, recreational access, and cultural heritage, making it a valued asset within the regional transportation and park systems.

Clara Barton Parkway is a four-lane, limited-access parkway (i.e., commercial vehicle use is restricted) from where it begins at MacArthur Boulevard to the west, to just past the MacArthur Boulevard exit ramp to Glen Echo within the limits of the Project. From there, Clara Barton Parkway reduces to two lanes into Washington, DC, eventually changing to Canal Road. The posted speed limit is 45 miles per hour (mph) along the four-lane section, and 35 mph along the two-lane section, which is intended to encourage traffic calming and use of Clara Barton Parkway as a recreational corridor rather than a commuter route. However, Clara Barton Parkway is heavily used by commuters because it connects areas of western Montgomery County to Washington, DC, although the design intention of the Parkway was not to accommodate modern day traffic volumes. Roughly 40,000 vehicles travel on the cantilevered section of Clara Barton Parkway each day, consisting primarily of commuter traffic, according to annual daily traffic (ADT) data.

The NPS contracted with the Volpe National Transportation Systems Center (Volpe Center), to conduct a traffic impact study for the proposed cantilever structure and associated retaining wall reconstruction. The study examined current speed reductions and traffic delay at the intersections of (1) Clara Barton Parkway WB at the Clara Barton EB U-turn (merge/weave), (2) Clara Barton Parkway WB at the Clara Barton Parkway Ramp (diverge/merge), (3) Clara Barton Parkway WB at Cabin John Parkway (diverge), and (4) MacArthur Boulevard at the Clara Barton Parkway Ramp (signalized) (**Figure 6**). The study was completed for the weekday peak hour of 4:45 to 5:45 p.m. for Clara Barton Parkway WB because the demand of outbound traffic is highest, representing a typical worst-case scenario.

The Volpe Center estimated that over 2,800 vehicles use the cantilevered section of the Parkway on weekdays during the peak hour between 4:45 and 5:45 p.m. using traffic data from continuous traffic counters along Clara

Barton Parkway collected from May, September, and October 2022 during typical weekdays on Tuesday, Wednesday, and Thursday (**Figure 7**).

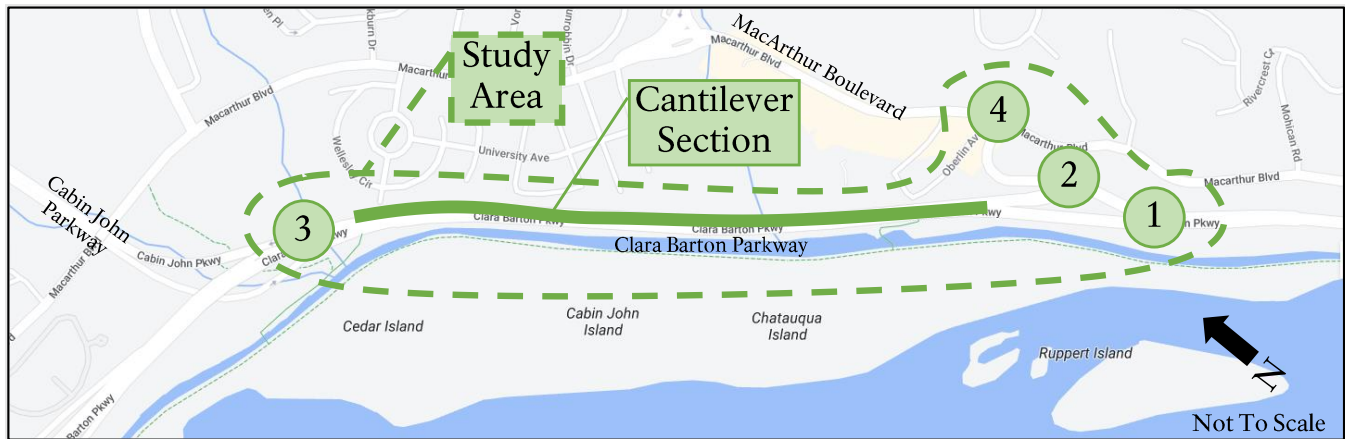


Figure 6. Traffic Impact Study Area and Intersections

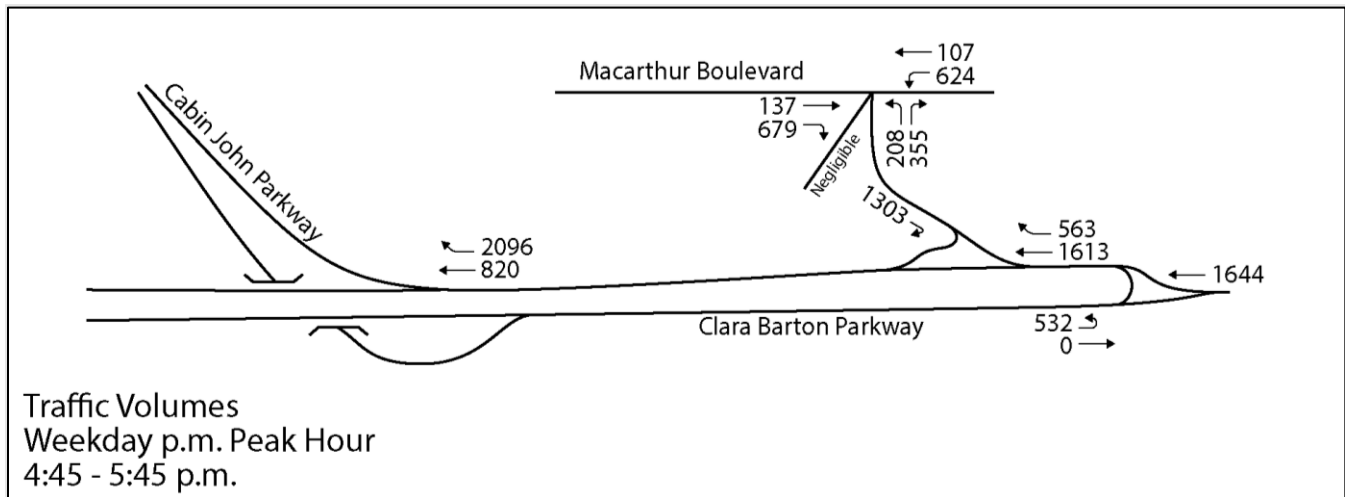


Figure 7. Hourly Traffic Volumes, Weekday p.m. Peak Hour

The Volpe Center obtained speed data for Clara Barton Parkway from the National Performance Management Research Data Set to assess how vehicle speeds are affected during peak traffic volumes in the WB direction. Pre-COVID pandemic, 2019 speed data, was used for this assessment. The data showed that beginning around 3:00 p.m., speeds on Clara Barton Parkway between the Maryland/DC line and the exit ramp to MacArthur Boulevard gradually decreased to an average of 20-30 mph until about 5:45 p.m. when they returned to almost free flow conditions. While speed increased after 5:45 p.m., vehicles queuing caused traffic congestion that likely caused added delay. Even during the peak p.m. hour, vehicles experienced free flow conditions on Clara Barton Parkway once past the MacArthur Boulevard exit heading WB toward Cabin John Parkway.

Environmental Consequences

The NPS considered operation- and construction-related lane reduction scenarios that are likely to occur and evaluated traffic and speed data to analyze the impacts of each alternative on park visitors and commuters on Clara Barton Parkway. NPS performed analysis of potential impacts using data provided by technical experts,

professional judgment, information provided by park staff, public comments, and experience with similar past projects.

Impacts of Alternative A: No Action

The NPS anticipates that a permanent single lane closure in each direction (see **Figure 2**) because of the deteriorating cantilever structure would worsen traffic under the no action alternative. The Volpe Center performed an operations analysis to compare existing traffic conditions with projected conditions under the assumption that Clara Barton Parkway WB would be reduced to one lane along the cantilevered section of the Parkway under the no action alternative. The operations analysis was completed for Clara Barton Parkway WB during the weekday peak hour of 4:45 to 5:45 p.m., which represents the worst-case scenario. The analysis determined the lane reduction would have substantial impacts on traffic operations at three of the four study area intersections presented on **Figure 6**.

Table 1 presents a detailed traffic operations summary for the existing conditions and for the lane reduction scenario under the no action alternative. Summaries of the worse-case traffic impacts for each of the intersections in the study area, for the Clara Barton Parkway WB lane takedown, and for the overall study area transportation network, are provided in the following sections of the EA.

Table 1. Traffic Operations Summary, Weekday p.m. Peak Hour

Clara Barton Parkway WB at Clara Barton Parkway EB U-Turn

Movement	Scenario	Total Delay (s)	Stop Delay (s)	Percent of Volume	Avg Percentile Queue Length (ft)	Avg Speed (mph)
WB Through	Existing	392.7	54.0	86	3,852	11
	WB Lane Reduction	1,276.5	1,401.7	43	10,710	3
NB Left	Existing	0.3	0.0	103	0	16
	WB Lane Reduction	2.9	2.4	102	46	10
Overall	Existing	299.6	41.2	90		
	WB Lane Reduction	870.4	955.5	57		

Clara Barton Parkway WB at Clara Barton Parkway Ramp

Movement	Scenario	Total Delay (s)	Stop Delay (s)	Percent of Volume	Avg Queue Length (ft)	Avg Speed (mph)
WB Through	Existing	42.1	33.9	87	412	6
	WB Lane Reduction	101.4	107.0	45	477	3
WB Right	Existing	33.4	26.4	101	454	7
	WB Lane Reduction	74.6	77.4	93	468	4
SB Right	Existing	4.7	0.1	71	0	17
	WB Lane Reduction	62.0	65.3	56	101	5
Overall	Existing	28.5	21.7	83		
	WB Lane Reduction	79.8	83.9	57		

Clara Barton Parkway WB at Cabin John Parkway

Movement	Scenario	Total Delay (s)	Stop Delay (s)	Percent of Volume	Avg Queue Length (ft)	Avg Speed (mph)
WB Through	Existing	12.6	0.1	78	0	30
	WB Lane Reduction	11.0	1.7	50	0	30
WB Right	Existing	13.8	0.1	85	0	29
	WB Lane Reduction	11.0	1.7	48	0	30
Overall	Existing	13.0	0.1	80		
	WB Lane Reduction	11.0	1.7	50		

MacArthur Blvd at Clara Barton Pkwy Ramp/Oberlin Ave

Movement	Scenario	Total Delay (s)	Stop Delay (s)	Percent of Volume	Avg Queue Length (ft)	Avg Speed (mph)
EB Left	Existing	48.2	41.7	100	216	6
	WB Lane Reduction	46.4	40.2	90	189	6
EB Right	Existing	18.2	12.5	100	78	11
	WB Lane Reduction	14.8	9.3	95	75	13
NB Left	Existing	765.0	784.3	72	275	2
	WB Lane Reduction	878.8	900.3	61	274	2
NB Through	Existing	715.2	735.7	77	3,638	3
	WB Lane Reduction	823.8	848.1	73	3,676	2
SB Through	Existing	767.8	780.2	74	4,249	3
	WB Lane Reduction	1,036.4	1,081.5	52	4,407	2
SB Right	Existing	779.3	795.6	71	4,249	3
	WB Lane Reduction	1,089.9	1,140.1	51	4,407	2
Overall	Existing	559.4	570.3	80		
	WB Lane Reduction	689.6	712.8	66		

Clara Barton Parkway WB Lane Takedown

Movement	Total Delay (s)	Stop Delay (s)	Percent of Volume	Avg Queue Length (ft)	Avg Speed (mph)
WB Through	91.8	101.0	50	537	3
Overall	91.8	101.1	50		

Overall Network Summary

Scenario	Vehicles Entered	Denied Entry	Zone-Wide Queuing Penalty
Existing	3,325	459	427
WB Lane Reduction	2,160	1,572	4,798

Clara Barton Parkway WB at the Clara Barton Parkway EB U-Turn. On Clara Barton Parkway WB at the Parkway EB U-turn, a lane reduction would cause a projected increase in vehicle delays from 393 seconds (6.5 minutes) to over 1,276 seconds (21.3 minutes), the average speed to drop from 11 mph to just 3 mph, and average queue lengths to extend from 3,852 feet (0.73 miles) to as much as 10,710 feet (2.03 miles). Stop delays are also projected to increase from 54 seconds to 1,402 seconds (23.4 minutes), indicating heavy congestion with stop and go conditions. Finally, with the lane reduction, the percent of traffic volume processed by the intersection would reduce from 86% to 43%, indicating Clara Barton Parkway WB at the EB U-turn would not have near the capacity to handle the anticipated traffic volumes.

Clara Barton Parkway WB at Clara Barton Parkway Ramp. Similarly, at the ramp intersection, delays for turning and merging movements nearly double or triple, while speeds decrease. A lane reduction would cause a projected increase in vehicle delays for WB through traffic from 42 seconds to over 104 seconds (1.7 minutes), the average speed to drop from 6 mph to 3 mph. Average queue lengths would extend from 412 feet (0.08 miles) to 477 feet (0.09 miles) and therefore would not be drastically different than the existing condition. However, stop delays are projected to increase from 44 seconds (less than one minute) to 107 seconds (1.8 minutes), indicating heavy congestion with stop and go conditions, but for a much shorter timeframe than at the EB U-turn. Finally, with the lane reduction, the percentage of traffic volume processed by the intersection would reduce from 87% to 45%, indicating the intersection would not have near the capacity to handle the anticipated traffic volumes.

Clara Barton Parkway WB at Cabin John Parkway. The Cabin John Parkway intersection remains relatively unaffected, showing minimal change in delays or speed, suggesting it's less sensitive to the lane reduction.

MacArthur Boulevard at Clara Barton Parkway Ramp/Oberlin Avenue. Already long delays observed at the MacArthur Boulevard and Clara Barton Parkway Ramp/Oberlin Avenue intersection would worsen further for

northbound and southbound through movements because of the lane reduction. Impacts would be most severe at the southbound through and right turn movements with total and stop delays between 750 and 800 seconds (12.5 and 13.3 minutes) in the existing condition projected to exceed 1,000 seconds (16.7 minutes) with the lane reduction. Left and right turns from the EB approach are slightly improved or remain similar.

Clara Barton Parkway WB Lane Takedown. Approximately 92 seconds (1.5 minutes) of total delay is anticipated during the peak p.m. hour, as well as a stop delay of 101 seconds (1.7 minutes), east of the study area where Clara Barton Parkway WB would be reduced from two lanes to one. These delays would be caused by high volumes of two-lane traffic converging into one prior to the MacArthur Boulevard exit ramp.

Overall Study Area Network. The number of vehicles able to enter the overall study area roadway network drops from 3,325 to 2,160, while the number of vehicles denied access increases substantially from 459 to 1,572. The queuing penalty, which measures traffic backup, also increases drastically from 427 to 4,798 vehicles, which demonstrates the severe long-term adverse traffic impacts that would result from a lane reduction if the cantilever structure is not replaced and the retaining walls are not reconstructed under the no action alternative.

Impacts of Alternative B: Clara Barton Parkway Cantilever and Glen Echo Overpass Project

Traffic and Accessibility. Construction-related traffic delays, queue lengths (i.e., traffic congestion), reduced travel speeds, and reduced network capacity would be similar under the Project when compared with the lane reduction scenario of the no action alternative. The NPS would maintain traffic on Clara Barton Parkway to accommodate one EB lane and one WB lane through the construction area. The lanes used to maintain two-way traffic are likely to switch as construction progresses and new work phases begin. For example, both existing EB lanes may be temporarily converted to two-way traffic lanes while work is being conducted on the WB lanes, such as removing or installing the cantilevered slabs, while the hillside is excavated, and rock bolts are installed. Additionally, NPS expects that all but one lane may require temporary closure for short durations for the safety of the traveling public and construction workers, and to perform certain construction activities more efficiently. If this occurs, the single open lane would flow in the peak direction until a second lane reopens to traffic.

The NPS expects to completely close Clara Barton Parkway WB and the exit ramp to MacArthur Boulevard to accomplish demolition of the Glen Echo Overpass in an expedited manner. This means that the Clara Barton Parkway EB U-turn to MacArthur Boulevard would also be closed while the bridge is demolished. However, Clara Barton Parkway WB would remain accessible from MacArthur Boulevard while the overpass is removed. It is possible that through traffic on Clara Barton Parkway WB may be temporarily diverted to an EB lane around the overpass removal until the WB ramp is reopened. Drivers on MacArthur Boulevard would need to drive west to the Clara Barton Parkway access road west of Cabin John Parkway to access the Parkway EB. The NPS would attempt to schedule this traffic diversion to occur concurrently with a phase of the cantilever structure reconstruction that would require two-way traffic on the EB lanes. The NPS anticipates removal of the overpass would take no more than two weeks to complete, at which time Clara Barton Parkway WB and the MacArthur Boulevard exit would be reopened.

The NPS plans to award the Project to a Design-Build (D-B) contractor and intends to make the contractor responsible for preparing and implementing detailed MOT Plans that reduce temporary construction-related traffic impacts on Clara Barton Parkway, MacArthur Boulevard, and other community roadways. The NPS anticipates the most effective way for commuters to avoid substantial delays on Clara Barton Parkway, particularly during peak evening travel periods in the WB direction, would be to divert to GW Parkway, on which the current rehabilitation efforts would be completed by the time the Project begins. MOT Plans would be coordinated closely with Maryland DOT – SHA, MCDOT, the town of Glen Echo, and other stakeholders, as applicable, to ensure that the most effective MOT Plans are developed and are coordinated with other construction projects that may have effects on traffic circulation in the vicinity. The NPS would provide advance public notice of changes to the construction schedule or traffic patterns, as well as recommendations for detours or alternative routes to avoid construction-related delays on Clara Barton Parkway. Regardless, there would be severe short-term adverse traffic impacts on Clara Barton Parkway during construction.

The C&O Canal NHP parking lot accessing the towpath, Canal Lock #7, and the Lock Keeper's House along Clara Barton Parkway EB may remain open, although the D-B contractor may elect to use the parking lot temporarily for materials and equipment staging. The NPS would ensure the parking area is restored if damaged during construction. Once construction is complete, all four lanes of the cantilevered section of Clara Barton Parkway would reopen and traffic would be expected to return to pre-construction conditions.

Noise. The NPS anticipates there would be construction-related noise impacts, particularly for the Glen Echo residents closest to Clara Barton Parkway, and noise concerns may also arise for events at the Spanish Ballroom at Glen Echo Park. Construction noise is expected to vary depending on construction needs, location, and the type of equipment used. Temporary noise would be generated by relatively typical roadway construction activities, such as concrete demolition, removal, and installation; subsurface and hillside excavations; vegetation clearing; and micropile and rock bolt installation.

The NPS would implement a noise monitoring and resource protection program to minimize disruption at Glen Echo Park and surrounding areas. The NPS would require the D-B contractor to adhere to Montgomery County's Noise Control Ordinance at Chapter 31B of the County Code. The D-B contractor would prepare a Noise Suppression Plan for Montgomery County Department of Environmental Protection (MCDEP) review and approval that details the use of the most effective noise-suppression equipment, materials, and methods appropriate and reasonably available for construction. With an approved Noise Suppression Plan, construction noise cannot exceed 85 dB(A) to adjacent residences within 50 feet during weekday, daytime hours (7:00 a.m. to 5:00 p.m.). Without a Noise Suppression Plan, construction noise cannot exceed 75 dB(A) to adjacent residences within 50 feet during weekday, daytime hours. A-weighted decibels or dB(A) is a measurement of the relative loudness of sounds as perceived by the human ear. Ambient noise, or background noise, in a normal suburban residential area typically ranges from 41 to 45 dB(A). Ambient noise for residences closest to Clara Barton Parkway may be upwards of 60 dB(A) during peak travel periods.

The NPS would conduct a baseline ambient noise survey prior to construction within the anticipated daily work schedule for construction at sensitive receptors, including, but not limited to, the Spanish Ballroom at Glen Echo Park, as identified in coordination with representatives of Glen Echo, Glen Echo Park, and other project stakeholders, as necessary. The NPS would also coordinate with stakeholders to review proposed construction schedules and identify specific events in advance during which construction activities should be limited. The NPS would then conduct continuous real-time noise monitoring during construction to ensure noise does not exceed allowable limits. The NPS would also limit high-noise work to midday (e.g., 9:30 a.m.–3:30 p.m.), prohibiting loud work during ballroom events (with calendar coordination), and using a "quiet hours" policy for mornings, evenings, and weekends. The NPS would frequently engage with the community to provide updates on construction progress, share event calendars to avoid disruption during special events, and assign a construction-community liaison that can be contacted directly with any construction-related concerns. The NPS expects noise to return to pre-construction conditions once construction of the Project is complete.

Conclusion

The NPS anticipates substantial traffic impacts on Clara Barton Parkway from lane closures required to complete construction. The D-B contractor would prepare MOT Plans coordinated with the appropriate agencies and local stakeholders to minimize delays as much as possible. Additionally, construction-related noise may be disruptive to visitors to Glen Echo Park and nearby residents; however, NPS would ensure the D-B contractor adheres to the Montgomery County Noise Control Ordinance and noise monitoring and resource protection program. Traffic and noise are expected to return to pre-construction conditions once the Project has been completed.

HISTORIC STRUCTURES AND DISTRICTS

Affected Environment

The NPS used the APE for the Project that has been developed in accordance with Section 106 of the NHPA as part of a separate but parallel regulatory process to identify potentially impacted historic properties for the NEPA analysis. The APE is defined as “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking” (36 CFR 800.16[d]).

The NPS identified several historic properties within the APE, including historic districts and individual properties listed in the National Register, as well as resources that are not individually listed but contribute to the significance of a historic district. The following historic properties are within the APE:

- GW Parkway/Clara Barton Parkway (M: 35-61), Clara Barton National Historic Site (M: 35-25), Glen Echo Park Historic District (M: 35-41), and C&O Canal National Historical Park (M: 12-46) are individually listed in the National Register.
- The Carousel (M: 35-39) and Chautauqua Tower (M: 35-26) are individually listed in the National Register and contribute to the significance of the Glen Echo Park Historic District.
- The C&O Canal NHP Lock #7 and Lock Keeper’s House (M: 35-27) has not been evaluated for individual listing in the National Register but contributes to the significance of C&O Canal NHP.

These historic properties are identified on the APE map provided as **Figure 8** and are described in detail in the Assessment of Effects (NPS 2025) prepared for the Project to comply with Section 106 of the NHPA.

Environmental Consequences

Potential impacts on historic properties were analyzed in consideration of regulations implementing Section 106 of the NHPA and guidelines stated within the Secretary’s *Standards for the Treatment of Historic Properties* (NPS 1995). The analysis of the potential impacts of the Project on historic properties focused on whether the proposed undertaking would “...alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association” (36 CFR 800.5(a)(1)). The following analysis is an assessment of the direct and indirect alterations to the qualifying characteristics of all listed, eligible, and contributing historic properties from the proposed action.

Impacts of Alternative A: No Action

The NPS would continue to conduct the minimum maintenance required to keep the cantilevered section of Clara Barton Parkway open to the commuting public as long as it is safe to do so. However, NPS anticipates that weight restrictions may be necessary as early as 2026 based on the deteriorating conditions of the cantilever structure observed during recent inspections. The FHWA would frequently inspect the cantilever structure and emergency actions would be performed, as needed, to ensure the safety of the traveling public on Clara Barton Parkway. Similarly, the Glen Echo Overpass would remain unused, while requiring regular inspections and maintenance to ensure the safety of the public traveling underneath the overpass. Adverse effects on Clara Barton Parkway may occur should routine maintenance measures fail to stop the continued deterioration that diminishes the integrity of design, materials, and workmanship of Clara Barton Parkway.

Impacts of Alternative B: Clara Barton Parkway Cantilever and Glen Echo Overpass Project

This section summarizes the potential effects of the Project on the historic properties identified within the APE as part of the Section 106 compliance process. More details can be found in the Assessment of Effects (NPS 2025) prepared for the Project to comply with Section 106 of the NHPA.

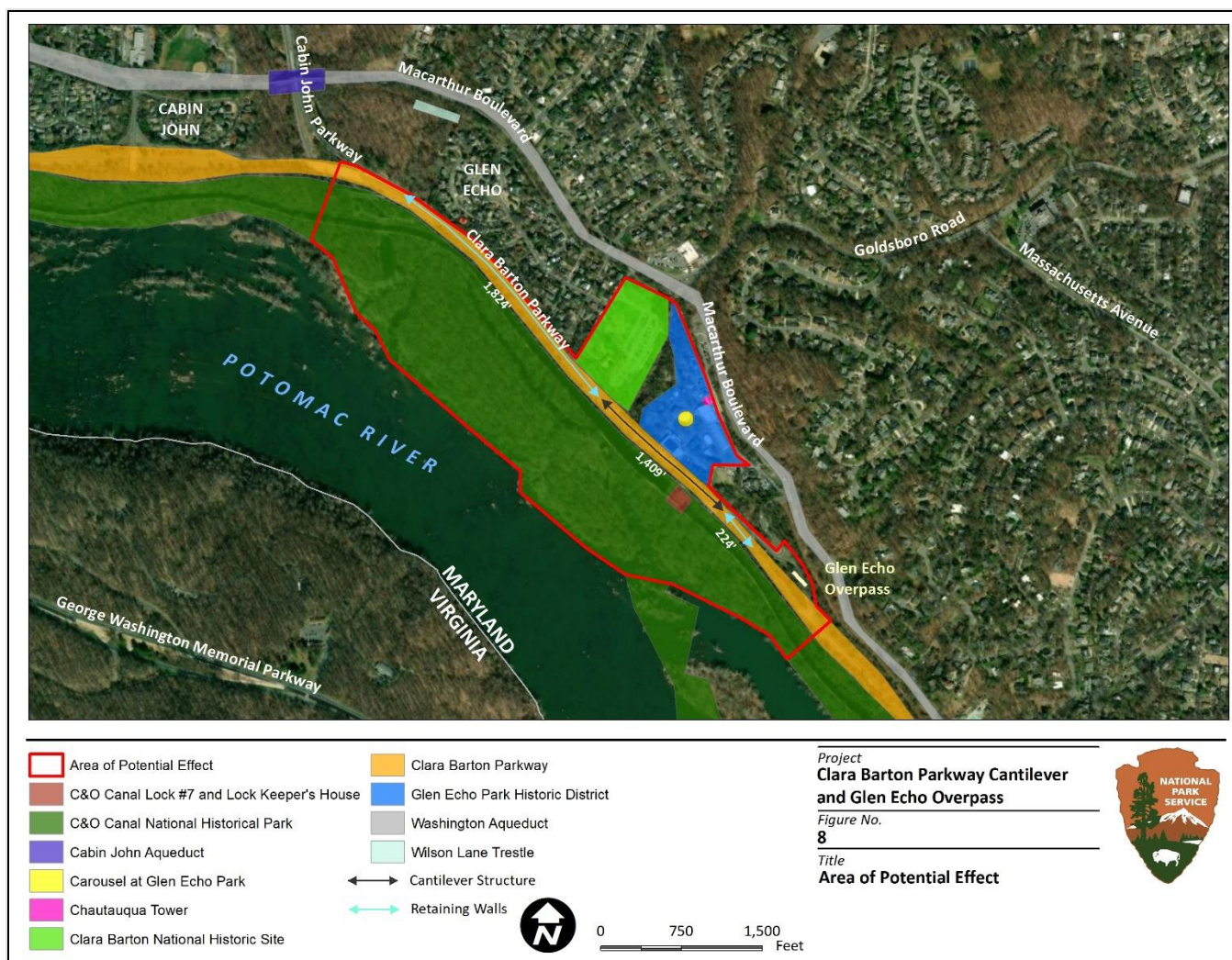


Figure 8. Area of Potential Effect

George Washington Memorial Parkway/Clara Barton Parkway (M: 35-61). The Clara Barton Parkway was listed in the National Register in 1995 as part of a thematic, multiple-property nomination for the parkways of Washington, DC. It is nationally significant under Criterion A (Land Conservation and Community Planning and Development) for its role in Washington, DC's urban planning and the conservation of the Potomac River Gorge. It is also significant under Criterion C (Design Significance) for its unique engineering and landscape design, especially in adapting parkway design standards to a constrained site, using retaining walls and cantilevered roadways to fit into its tight geographic setting. However, the eastern portion, from Glen Echo to Chain Bridge, is only significant under Criterion A because it was altered from the original design and has a different character from the rest of the Parkway (Kelsch P et al. 2015).

The Clara Barton Parkway cantilever structure was originally designed to navigate challenging terrain between the C&O Canal NHP and Glen Echo. The cantilever structure, retaining walls, and Glen Echo Overpass are contributing resources to Clara Barton Parkway as documented in the Cultural Landscape Inventory for Clara Barton Parkway (Kelsch P et al. 2015). While the new cantilever structure and retaining walls would look similar to the existing structures, the NPS anticipates construction of a new cantilever structure with a narrower overhang, the addition of new retaining walls that would obscure views of the current walls, realignment of the roadway, hillside excavation that would remove trees and expose bedrock, and demolition of the Glen Echo Overpass, would result in an adverse effect on Clara Barton Parkway. As such, the NPS proposes preparing Level II HAER

documentation for the cantilever structure and Glen Echo Overpass to resolve the adverse effects on Clara Barton Parkway. The HAER documentation would include a written historical report, large-format photographs, measured drawings, and field notes and supporting documentation. The NPS would archive the final HAER documentation and transmit the documents to the Library of Congress and MHT.

The NPS also proposes to develop and install interpretive signage in consultation with the MD SHPO to resolve the adverse effects. The interpretive signage would serve to educate the public about the historical significance of Clara Barton Parkway, including the design and function of the original cantilever structure and Glen Echo Overpass, and explain the need for their modification or removal. The signage would highlight the parkway's role within the larger GW Parkway cultural landscape, the influence of mid-20th-century parkway planning, and the ingenuity of its infrastructure.

Clara Barton National Historic Site (M: 35-25). Although the cantilever structure would be replaced and the associated retaining walls would be reconstructed, any differences between the old and new retaining walls and the new safety railings are unlikely to be noticeable from the Clara Barton National Historic Site. The NPS would remove trees as part of the hillside excavation that may open the viewshed further, particularly in the winter months. However, some trees and understory vegetation would remain. Most of the property is set back from Clara Barton Parkway and the steep downward slope and vegetation partially blocks views from the Clara Barton National Historic Site during much of the year. Additionally, the Glen Echo Overpass is far enough from the historic site, and obscured by trees and terrain, that its demolition would not be noticeable from the Clara Barton National Historic Site. As such, the proposed action would have no adverse effect on the Clara Barton National Historic Site.

Glen Echo Park Historic District (M: 35-41). Portions of Clara Barton Parkway become partially visible from the Glen Echo Park Historic District during winter. However, most of the property is set back from Clara Barton Parkway and with the steep downward slope, would not view the proposed cantilever structure replacement and retaining wall reconstruction. The Spanish Ballroom, however, partially views the WB lanes of Clara Barton Parkway during the winter. Tree removal on the hillslope would make views clearer from the ballroom to Clara Barton Parkway year-round. The ballroom is also close to the edge of the downward slope, and as such, there is concern that vibration caused by rock bolt installation would impact the building. However, the NPS plans to implement a thorough vibration monitoring and resource protection program that may include, but is not limited to, pre-construction geotechnical surveys and baseline monitoring setup, pre- and post-construction structural surveys, real-time vibration monitoring during construction, implementing structural protections and/or temporary vibration barriers during construction (if needed), and identifying alternative construction methods and/or equipment modifications for installing rock bolts that minimize vibration. Additionally, the Glen Echo Overpass is far enough from the historic district, and obscured by trees and terrain, that its demolition would not be noticeable. As a result, the NPS anticipates no adverse effect on the Glen Echo Park Historic District, including the Spanish Ballroom.

The Carousel at Glen Echo Park (M: 35-39). Views of the cantilever structure and Glen Echo Overpass from the Carousel are obstructed by dense forest and buildings. Therefore, the proposed action would have no adverse effect on the Carousel.

Chautauqua Tower (M: 35-26). Views of the cantilever structure and Glen Echo Overpass from Chautauqua Tower are obstructed by dense forest and buildings. Therefore, the proposed action would have no adverse effect on Chautauqua Tower.

C&O Canal National Historical Park (M: 12-46). The cantilever structure is visible from the northeastern edge of C&O Canal National Historical Park but becomes obscured farther into the park by trees and the slope of the landscape towards the Potomac River. Additionally, the slope of the landscape and forest block views to the Glen Echo Overpass. Therefore, the proposed action would have no adverse effect on C&O Canal National Historical Park.

C&O Canal Lock #7 and Lock Keeper’s House (M: 35-27). Any differences between the old and new retaining walls and the new safety railings are unlikely to be noticeable from Lock #7 and the Lock Keeper’s House. Additionally, views of the Glen Echo Overpass are blocked by the slope of the landscape and dense forest. Therefore, the proposed action would have no adverse effect on Lock #7 and the Lock Keeper’s House.

Conclusion

The proposed Project would have an adverse effect on Clara Barton Parkway from replacement of the original cantilever structure and reconstruction of the retaining walls, the addition of new retaining walls that would obscure views of the current walls, realignment of the roadway, excavation into the hillside and the associated removal of trees and exposure of bedrock, and removal of the Glen Echo Overpass. No adverse effects would be expected on the other historic properties within the APE.

The NPS and MHT have drafted an MOA in accordance with 36 CFR 800.6(c) due to the anticipated adverse effects on Clara Barton Parkway. The draft MOA provided in **Appendix B** describes the avoidance, minimization, and mitigation measures agreed upon by both agencies to resolve the adverse effects, which include preparing Level II HAER documentation for both the cantilever structure and Glen Echo Overpass, vibration and noise monitoring and resource protection, and public interpretation signage.

CLARA BARTON PARKWAY CULTURAL LANDSCAPE

Affected Environment

The NPS defines a cultural landscape as a geographic area, including both cultural and natural resources, associated with a historic event, activity, or persons exhibiting other cultural or aesthetic values. A 2015 Cultural Landscape Inventory for Clara Barton Parkway (Kelsch P et al. 2015) documented the NPS-designated landscape’s general boundaries, background, and significance. As a cultural landscape, Clara Barton Parkway is defined by several landscape characteristics and features that contribute to its integrity. **Table 2** articulates these characteristics and assesses their existing integrity as noted in the Cultural Landscape Inventory for Clara Barton Parkway (Kelsch P et al. 2015).

Table 2. Cultural Landscape Characteristics and Features of Clara Barton Parkway

Feature	Description
Natural Systems and Features	Natural Systems and Features are critical to Clara Barton Parkway’s integrity since much of the Parkway’s historical significance derives from its role in the preservation of the Potomac River Gorge. Land acquisition under the authority of the Capper-Cramton Act of 1930 protected the Gorge from being dammed and prevented construction of an interstate highway along its length. The wooded shoreline and islands are preserved in a natural state, as is the river. This landscape characteristic has integrity to the period of significance.
Spatial Organization	The Spatial Organization of Clara Barton Parkway is largely unchanged from the constructed design and has high integrity. The landscape is a long, thin ribbon of space lined with forested edges on either side and is undulating in nature, depending on the width of the road, its position on the slope, and the rhythm created by its exits, parking turnouts, bridges and other structures. In the stretches that were constructed as designed, west of Glen Echo and between Locks 5 and 6, Clara Barton Parkway is four lanes wide with park-like margins and planted trees to mark exit ramps and parking areas. The space widens in these places, and the park-like landscape fills the space between the wooded edges. East of Glen Echo, the spatial character is very different; in some places enclosed by forested walls, in others open and park-like, and elsewhere seemingly without a strong character at all. The absence or presence of the C&O Canal is an important component of the spatial organization with the roadway rising away from the canal as topography allows or descending to run adjacent to the canal when there is no other space for the road. Exits, parking areas and bridges create another dimension of the spatial rhythm, the design character of the Clara Barton Parkway landscape and marking progression along it.

Feature	Description
Land Use	<p>Land Use of Clara Barton Parkway is straightforward and maintains its integrity. The primary land use of transportation is as a commuter highway. Much of the impetus for building Clara Barton Parkway was to provide a high-speed yet scenic connection between the Capital Beltway and Georgetown in a manner sympathetic to the natural resources of the Potomac River Gorge. This utilitarian purpose enabled Clara Barton Parkway planners to fulfill their idealized vision of the Parkway as a scenic resource providing both visual appreciation of the Gorge and physical access to its historical and recreation resources. A secondary transportation use is that of recreation. Several parking areas provide easy access to the historical locks and lock houses of the C&O Canal and serve as trailheads to the canal towpath. Access from the communities atop the bluffs to the canal is provided by two pedestrian bridges, an at-grade road crossing, and a trail underneath Clara Barton Parkway at Cabin John Creek. Picnic tables are found in most of the parking areas. More extensive recreation facilities were constructed at Carderock as part of Clara Barton Parkway but are now managed as part of the C&O Canal. The physical and administrative separation of Carderock from Clara Barton Parkway and its inclusion with the C&O Canal does diminish somewhat the perceived role of the Parkway as a recreational venue and not just a commuter road. However, land use retains integrity to the period of significance.</p>
Topography	<p>The topography of Clara Barton Parkway is surprisingly subtle given the relatively dramatic conditions of the surrounding landscape. The roadway generally runs level when adjacent to the C&O Canal and gradually ascends, heading west from Lock 6 to Glen Echo. It then descends toward Cabin John Creek, gradually rises again to the Cabin John Gardens exit, and then descends almost unnoticeably until the Beltway at which point it runs level along the canal again to its end. All these grades are smooth with very subtle changes in grade, except at the Glen Echo exit where temporary connections between the cantilever structure and the unfinished roadway and exit have abrupt grade changes and short, steep slopes. Cross slopes are much more pronounced, especially at Brookmont and Glen Echo where the slope was cut and stepped with substantial retaining walls and the cantilever structure, transforming the already steep slopes into clearly constructed terraces. This feature retains integrity to its period of significance.</p>
Vegetation	<p>Vegetation consists of specimen plantings, naturalized plantings, and natural woodland. Clusters of specimen plantings occur at exits, parking areas, and other junctions where lanes divide or join. The grass beneath them is mowed regularly to maintain their open-grown character, and although many of the understory plants and larger trees have died or been removed (50-75% existing), in recent years new planting of similar species has replaced many of the missing ones. Overall, the specimen plantings have moderate integrity. It is difficult to assess the integrity of naturalized vegetation based on current information. This vegetation occurs frequently along the edges of Clara Barton Parkway where grading occurred, especially on the north side. Unlike the specimen clusters, mowing does not occur beneath them, and consequently they have naturalized into successional woodland. Other species have seeded in, so these areas do not have the same species composition as was originally planted, with only about 25% of the original trees planted still present in the woods. Woodland along most of the southern edge of Clara Barton Parkway and in many places on the northern side as well was already extant when the Parkway was constructed. Much of these woods have been impacted by invasive species. Due to these changes, vegetation has moderate integrity.</p>

Feature	Description
Circulation	Circulation is a critical component of the Clara Barton Parkway cultural landscape. Clara Barton Parkway serves three major types of vehicular circulation as well as pedestrian circulation. Motorists use Clara Barton Parkway as a commuter connection between the Capital Beltway (I-495) and Georgetown or downtown Washington; they use it for local access to the David Taylor Model Basin and the communities of Brookmont, Glen Echo and Cabin John; and they use it for scenic driving and recreational access to the C&O Canal, the Potomac River and Carderock Recreation Area. The highway connects at its eastern end to Canal Road and Chain Bridge, leading to Georgetown and Northern Virginia respectively, and at its western end to MacArthur Boulevard leading to Great Falls, the original intended destination for GW Parkway. Two high-speed exits connect Clara Barton Parkway to the Capital Beltway and Cabin John Parkway, and three local exits connect to MacArthur Boulevard at Glen Echo, MacArthur Boulevard at Cabin John Gardens, and the Carderock Recreation Area and David Taylor Model Basin. Six parking areas accommodate recreational access to the C&O Canal at Locks 6, 7, 8 and 10, at the Sycamore Pedestrian Bridge, and at Chain Bridge. Two pedestrian bridges were constructed across Clara Barton Parkway to connect the communities atop the bluffs to the C&O Canal, and these are augmented by an at-grade crossing near Lock 6 and a trail underneath the bridge over Cabin John Creek. The circulation of the Clara Barton Parkway cultural landscape retains high integrity.
Buildings and Structures	Buildings and Structures are important features of Clara Barton Parkway's historical significance, especially the large retaining walls and the cantilevered portion of the roadway that were constructed to fit the roadway between the C&O Canal and the base of the bluffs from Brookmont to Glen Echo. These structures, modern in their scale and engineering but faced with traditional stonework, strike a stylistic balance between modernity and history that is characteristic of the earlier segments of GW Parkway. Other historic structures in the cultural landscape include bridges, both pedestrian and vehicular, underpasses, culverts, guard wall and the roadway itself. While changes have been made to some of these, this landscape characteristic retains integrity to the period of significance.
Views and Vistas	Views and Vistas were a less important design element of Clara Barton Parkway than they are along other segments of GW Parkway. Despite its location parallel to the Potomac River, there are currently no designed views of the river as there were for the portions of Clara Barton Parkway on the Virginia side. Instead of views to the river, there are a few contributing views to the locks and lock houses of the C&O Canal and to Union Arch Bridge of the Washington Aqueduct. These two older lines of infrastructure are reminders of the industrial history of the Potomac Gorge, a history that ties into the larger mission of GW Parkway's symbolic and commemorative nature. Clara Barton Parkway sets up these internal views through its location and proximity to the canal rather than through overt clearing of the woods, and consequently the views have high integrity.
Small-Scale Features	The small-scale features of Clara Barton Parkway are critical in distinguishing the roadway from common road construction and help shape the experience of a Clara Barton Parkway for the motorists. The small-scale features of Clara Barton Parkway are signage, the curbs and gutters of the roadway, and a small masonry marker near the eastern entrance. The signage has retained its character with the scale and construction of the sign corresponding to historic photographs and construction documents within the period of significance. Further research is needed, however, to determine if there were more or less signs in the historic period than are extant. The curbs and gutters of Clara Barton Parkway are the most abundant small-scale features. The curbs along much of Clara Barton Parkway have deteriorated to the extent that they have changed the visual appearance of the roadway. The origin and ownership of the small masonry marker is uncertain and requires further research. Therefore, it seems that small-scale features maintain moderate historic integrity.
Archeological Sites	Pre-Columbian archeological sites are present in the landscape of the Potomac River Gorge and likely exist on lands acquired as part of GW Parkway. More recent remains of the former DC Transit streetcar line are likely extant between the Little Falls Pumping Station and the Sycamore pedestrian bridge and have the potential to shed light on that era. Other historic sites such as domestic and quarry sites have also been identified within the project area and there is potential for sites relating to the C&O Canal NHP.

Source: Kelsch P et al. 2015

Environmental Consequences

This analysis focuses on the potential impact of the Project on the NPS-designated Clara Barton Parkway Cultural Landscape. The impact analysis considers the potential changes to the landscape conditions, characteristics, and character-defining features of contributing elements of the cultural landscape's overall historic significance using information collected from the Cultural Landscape Inventory for Clara Barton Parkway (Kelsch P et al. 2015).

Impacts of Alternative A: No Action

The NPS would continue to conduct the minimum maintenance required to keep the cantilevered section of Clara Barton Parkway open to the commuting public as long as it is safe to do so. However, the NPS anticipates that weight restrictions may be necessary as early as 2026 based on the deteriorating conditions of the cantilever structure observed during recent inspections. The FHWA would frequently inspect the cantilever structure and emergency actions would be performed, as needed, to ensure the safety of the traveling public on Clara Barton Parkway. Similarly, the Glen Echo Overpass would remain unused, while requiring regular inspections and maintenance to ensure the safety of the public traveling underneath the overpass. The no action alternative may result in adverse impacts should routine maintenance and repairs fail to stop deterioration that degrades elements and features that contribute to the significance of the Clara Barton Parkway Cultural Landscape.

Impacts of Alternative B: Clara Barton Parkway Cantilever and Glen Echo Overpass Project

This section analyzes how the Project might alter the characteristics and features of the Clara Barton Parkway Cultural Landscape described in **Table 2**, potentially diminishing its significance and integrity.

Natural Systems and Features. The Project would require small-scale alterations to natural features of the Clara Barton Parkway Cultural Landscape, particularly tree removal and hillside excavation. The NPS would replace trees removed during construction in accordance with NCP's Tree Preservation and Replacement Policy at locations along Clara Barton Parkway where trees could be planted that reflect the native plant communities and the cultural landscape character of the Parkway. As such, the Project would not threaten the continued preservation of the Potomac River Gorge or diminish the integrity of the natural systems or features that contribute to the significance of the Clara Barton Cultural Landscape.

Spatial Organization. The Project would require a minor roadway alignment shift to the north to install a cantilever structure with a narrower overhang. Hillside excavation and tree removal would be necessary to accommodate the alignment shift. However, the Project would not affect Clara Barton Parkway's spatial relationship with the natural landscape, its spatial organization with the C&O Canal NHP and landscape topography, or the design character of Clara Barton Parkway. The Project would not diminish the integrity of the spatial organization of the Clara Barton Parkway Cultural Landscape to an extent that would result in adverse effects.

Land Use. The Project would require a variety of construction-related disturbances. However, the Project would not alter the primary land uses of Clara Barton Parkway, which are to provide a scenic, commuter highway between the Capital Beltway and Georgetown in a manner that is sympathetic to the natural resources of the Potomac River Gorge, while also providing access to historical and recreational resources. As such, the Project would not threaten the continued preservation of the Potomac River Gorge or change the land uses that contribute to the significance of the Clara Barton Parkway Cultural Landscape.

Topography. Although the Project would require ground and hillside excavations during construction, the Project would not alter the topography of the Clara Barton Parkway Cultural Landscape to an extent that would result in adverse effects.

Vegetation. The Project would require removal of trees and understory vegetation to accommodate the alignment shift of Clara Barton Parkway WB to construct a cantilever structure with a narrower overhang, a drainage ditch, and rockfall area. Vegetation along the hillside is not part of the original planting plan of the Parkway, and many of the trees are overcome by invasive vines and susceptible to uprooting. The NPS would replace trees removed

during construction in accordance with NCPC's Tree Preservation and Replacement Policy at locations along Clara Barton Parkway where trees could be planted that reflect the native plant communities and the cultural landscape character of the Parkway. As such, the Project would not remove specimen trees originally planted during construction of the Parkway or change the vegetation characteristics to an extent that would result in an adverse effect on the Clara Barton Parkway Cultural Landscape.

Circulation. While construction of the Project would temporarily disrupt travel patterns due to lane closures and traffic diversions, the Project would not have a permanent effect on the vehicular or pedestrian circulation features that contribute to the significance of the Clara Barton Parkway Cultural Landscape.

Buildings and Structures. There are no significant buildings within the Clara Barton Cultural Landscape; however, transportation infrastructure contributes to the significance of the cultural landscape, including the roadway itself, the cantilever structure and retaining walls, vehicle and pedestrian bridges, culverts, and guard walls (Kelsch P et al. 2015). The Project would replace the existing cantilever structure and retaining walls and slightly modify the roadway alignment of Clara Barton Parkway WB, consequently narrowing the width of the cantilever structure. Existing safety rails on the cantilever structure would be replaced with new rails similar in appearance that meet safety hardware standards. The Project also includes removal of the Glen Echo Overpass. As such, modifications to the cantilever structure and retaining walls, changes to the roadway alignment, and removal of the Glen Echo Overpass would have adverse effects on the characteristics of the Clara Barton Parkway Cultural Landscape but overall would not significantly diminish the integrity of the contributing features.

Views and Vistas. Views and vistas were a less important design element according to the Cultural Landscape Inventory for Clara Barton Parkway (Kelsch P et al. 2015). Views of the locks and lockhouses of the C&O Canal NHP, as well as the Union Arch Bridge (also known as the Cabin John Aqueduct Bridge) contribute to the significance of the Clara Barton Parkway Cultural Landscape. Vegetation removal expected as part of the Project would not occur within these viewsheds, and as such, the Project would not diminish the integrity of views or vistas that would result in an adverse effect on the Clara Barton Parkway Cultural Landscape.

Small-Scale Features. Mountable curbs and roadway signage are the most abundant small-scale features within the limits of the Project. Curbs and signage would be replaced and/or restored, as needed, as part of the Project, and therefore no alterations would occur that would diminish the integrity of the small-scale features of the Clara Barton Cultural Landscape.

Archeological Sites. There are no known archeological sites within the limits of the Project, and no intact archeological resources are expected to be present because soils are heavily disturbed from construction of Clara Barton Parkway. As such, NPS expects there to be no disturbance to archeological sites that would result in an adverse effect on the Clara Barton Parkway Cultural Landscape.

Conclusion

The Project would have an adverse effect on the Clara Barton Parkway Cultural Landscape by replacing the cantilever structure and reconstructing the retaining walls, slightly modifying the alignment of Clara Barton Parkway WB and the associated narrowing of the cantilevered overhang, replacing the existing safety railings, and demolishing the Glen Echo Overpass. As discussed in the previous Historic Structures and Districts section, the NPS and MHT are in the process of preparing an MOA that outlines the avoidance, minimization, and mitigation measures agreed upon by both agencies to resolve the adverse effects, which include preparing Level II HAER documentation for both the cantilever structure and Glen Echo Overpass (**Appendix B**).

CHAPTER 4: CONSULTATION AND COORDINATION

The NPS places a high priority on public involvement in the NEPA process and on giving the public an opportunity to comment on the proposed action. Consultation and coordination with federal, state, and local agencies, and American Indian tribes were also conducted to refine the alternatives and identify issues and/or concerns related to environmental impact topics. This section provides a summary of the public involvement, and agency consultation and coordination that occurred during planning.

Public Involvement

The NPS involved the public in project planning by conducting public scoping from March 17 to April 16, 2025. The NPS announced the public scoping period on March 10, 2025, by distributing a news release by electronic notice to GW Parkway's maintained email distribution list. The notice was also posted in the "News Releases" section of the official GW Parkway website [[News - George Washington Memorial Parkway \(nps.gov\)](https://www.nps.gov/george-washington-memorial-parkway)]. An agency scoping notification letter was sent to a list of locally elected officials, agency and tribal representatives, and other potential stakeholders. The news release and agency letter included a link to the NPS Planning, Environment and Public Comment (PEPC) project webpage [[Clara Barton Parkway Cantilever \(nps.gov\)](https://www.nps.gov/clara-barton-parkway-cantilever)] where a public scoping notification letter from the Superintendent was posted. The notices included invitations to participate in agency and public scoping meetings to learn more about the Project and provided details on how to submit formal comments.

Agency Scoping Meeting

The NPS held an agency scoping meeting from 10:30 am to 12:30 pm on March 17, 2025, the day the public scoping period began. A focused group of locally elected officials, agency representatives, partners, and stakeholders were invited. The purpose of this meeting was to provide an opportunity for the participants to learn about the Project and to ask questions.

Virtual Public Scoping Meeting

A virtual public scoping meeting was held from 6:30 pm to 8:30 pm on March 19, 2025, to provide an opportunity for interested members of the public to learn more about the Project. The meeting was held using the GoToWebinar virtual meeting platform. Participants were provided the opportunity to join via computer or mobile device, which included both video and audio capabilities, or participants could attend using a toll-free phone number, which provided audio-only capabilities. The presentation lasted approximately 35 minutes, allowing more than an hour for questions and answers. Participants were able to submit questions through a chat feature provided by GoToWebinar. A total of 30 individuals attended the meeting. The presentation was posted to the PEPC project webpage [[Clara Barton Parkway Cantilever \(nps.gov\)](https://www.nps.gov/clara-barton-parkway-cantilever)] following the meeting. All materials shared via PEPC were compliant with Section 508 of the Rehabilitation Act of 1973, to ensure accessibility of federal electronic and information technology.

AGENCY CONSULTATION AND COORDINATION

Section 106 of the National Historic Preservation Act

The NPS formally initiated consultation with MHT pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR Part 800) "Protection of Historic Properties" (Section 106) on December 18, 2024. The letter described the Project, defined a draft APE, and identified known historic properties within the APE. MHT acknowledged receipt of the initiation letter on January 14, 2025, and concurred with the defined APE and the list of identified known historic properties within the APE.

The NPS identified federal, state, and local organizations, that are entitled to participate in consultation per 36 CFR 800.3(f). The NPS also sent letters to initiate government-to-government consultation with the following federally recognized American Indian tribes: the Catawba Indian Nation, Chickahominy Indian Tribe, Chickahominy Tribe Eastern Division, Delaware Nation, Eastern Shawnee Tribe of Oklahoma, Monacan Indian Nation, Nansemond Indian Nation, Pamunkey Indian Tribe, Rappahannock Tribe, Seneca Cayuga Nation, Shawnee Tribe, and the Upper Mattaponi Indian Tribe. The Chickahominy Tribe Eastern Division and Shawnee Tribe responded on December 30, 2024, and on February 11, 2025, respectively, that the Project is outside their area of interest. The Tribal Historic Preservation Office for the Catawba Indian Nation responded on January 21, 2025, requesting to be notified if any Native American artifacts and/or human remains are discovered within the APE. Responses have not been received from the other tribes as of the preparation of this EA.

The NPS continued Section 106 consultation by sending a letter on February 26, 2025, notifying MHT of an anticipated adverse effect finding on Clara Barton Parkway. Although an adverse effect was anticipated, the NPS committed to preparing an Assessment of Effects to describe the potential effects of the alternatives and modifications developed for the Project on the historic properties within the APE and introduce potential mitigation measures to resolve adverse effects for continued consultation with MHT. MHT responded on April 2, 2025, agreeing that an adverse effect is likely and that they await the NPS' finding of effect. The NPS prepared the Assessment of Effects after public scoping concluded, and a Preferred Alternative was identified. The Assessment of Effects, which found there would be an adverse effect on Clara Barton Parkway, was submitted to MHT and consulting parties and was made available for public comments at the NPS PEPC website from June 6, 2025, to July 7, 2025. MHT concurred with the NPS' adverse effect finding on July 1, 2025. The NPS notified the Advisory Council on Historic Preservation (ACHP) of the adverse effect on July 9, 2025, and invited ACHP to participate in consultation to resolve the adverse effect. ACHP declined to participate in a response received on July 16, 2025. Section 106 consultation correspondence can be found in **Appendix C**.

Section 106 consultation is ongoing at the time of this EA. The NPS and MHT are currently in the process of developing an MOA that provides the mechanism to resolve the adverse effects of the Undertaking and complete the requirements of Section 106 of the NHPA (54 USC 306108) and its implementing regulations (36 CFR Part 800). The MOA defines the agreed upon avoidance, minimization, and mitigation measures to resolve adverse effects on Clara Barton Parkway and to prevent adverse effects to the Spanish Ballroom at Glen Echo Park. The draft MOA is included as **Appendix B**.

Section 7 of the Endangered Species Act

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

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

List of Agencies and Stakeholders

A list of agencies, American Indian tribes, elected officials, and other stakeholders that GW Parkway contacted for input or that provided feedback during project planning is provided below.

- Absentee Shawnee Tribe of Oklahoma
- Accohannock Indian Tribe
- ACHP
- American Red Cross
- Bannockburn Civic Association
- Bethesda/Chevy Chase Regional Services Office
- Bordertown Historical Society
- C&O Canal Association
- C&O Canal National Historical Park
- C&O Canal Trust
- Cabin John Citizens Association
- Carderock Springs Citizens Association
- Catawba Indian Nation
- Chickahominy Indian Tribe
- Chickahominy Tribe Eastern Division
- Delaware Nation
- Delaware Tribe of Indians
- East County Citizens Advisory Board
- Eastern Shawnee Tribe of Oklahoma
- Glen Echo Heights Citizens Association
- Glen Echo Park Partnership for Arts and Culture
- Heritage Montgomery
- Kenwood Park Community Association
- MHT
- Maryland Women's Heritage Center
- MDNR, Wildlife & Heritage Service
- MDOT-SHA
- Mohican Hills Citizens Association
- Monacan Indian Nation
- Montgomery County Civic Federation
- Montgomery County Council
- MCDOT
- Montgomery County Executive
- Montgomery County Renters Alliance
- Montgomery County Taxpayers League
- Montgomery History
- Montgomery Park Citizens Association
- Montgomery Planning
- Montgomery Planning, Historic Preservation
- Montgomery Preservation
- Nansemond Indian Nation
- National Collaborative for Women's History Sites
- National Parks Conservation Association
- National Trust for Historic Preservation
- Naval Surface Warfare Center, Carderock Division
- NCPC
- Pamunkey Indian Tribe
- Piscataway Conoy Tribe
- Piscataway Indian Tribe
- Preservation Maryland
- Rappahannock Tribe
- Seneca Cayuga Nation
- Shawnee Tribe
- Sierra Club, Montgomery County Group
- Town of Glen Echo
- Tulip Hill Citizens Association
- Upper Mattaponi Indian Tribe
- US Environmental Protection Agency, EA Branch
- USFWS, Chesapeake Bay Field Office

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CHAPTER 5: REFERENCES

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- 1995 The Secretary of the Interior's Standards for the Treatment of Historic Properties. Available at: [Secretary's Standards \(nps.gov\)](#).
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Clara Barton Parkway Cantilever and Glen Echo Overpass

Environmental Assessment

Appendix A. Alternatives Dismissed from Further Consideration

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ALTERNATIVES DISMISSED FROM FURTHER CONSIDERATION

The NPS considered one rehabilitation alternative and several replacement alternatives for the cantilever structure during initial project planning. All the dismissed replacement alternatives are slightly modified versions of the Proposed Action, or the dismissed replacement alternative described below. This section provides brief descriptions of the cantilever structure alternatives that NPS presented during public scoping but ultimately dismissed from further consideration, as well as the rationale for their dismissal. Rationale for why rehabilitating the Glen Echo Overpass is not feasible or practical, and why noise walls are not included in the proposal, is also discussed.

Cantilever Structure In-Kind Replacement

The NPS would replace the cantilever structure “in-kind”, remove the existing cantilevered slab, and build a soldier pile wall (Figure A-1, top left). The soldier pile wall would hold back soil while the NPS removes the existing retaining wall and footing and prepares the site for a new structure (Figure A-1, bottom left). The NPS would then construct a new retaining wall and footing (Figure A-1, top right), remove the top of the soldier pile wall, and install a new cantilever slab (Figure A-1, bottom right).

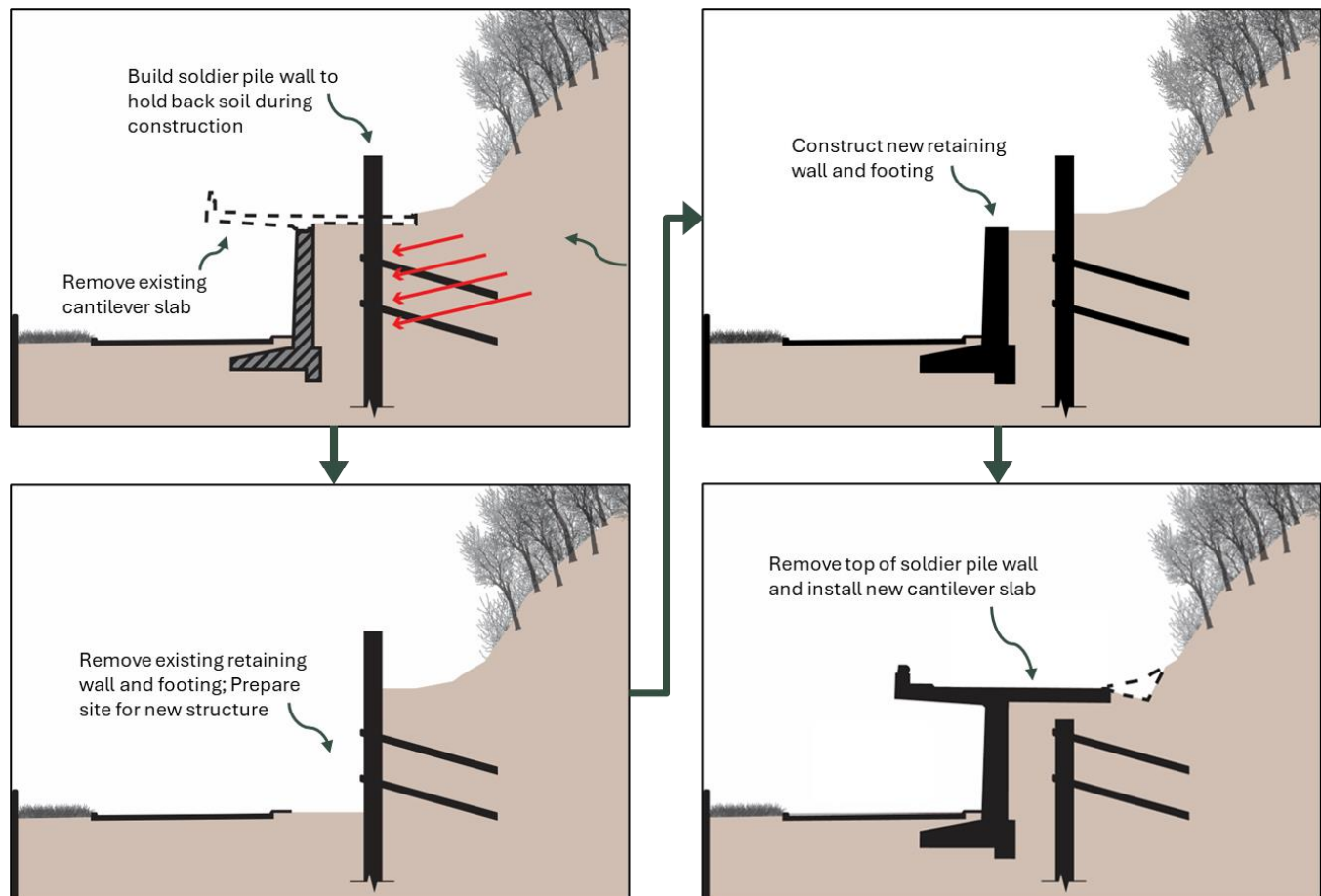


Figure A-1. Conceptual Schematic of the Dismissed In-Kind Cantilever Replacement Alternative

While the in-kind replacement alternative would have a lower total area of disturbance and less hillside impacts compared to the Proposed Action, the alternative has several disadvantages. The in-kind replacement alternative would have an anticipated construction duration approximately 180 days longer and cost approximately \$24

million dollars more to construct as compared to the Proposed Action. Additionally, the in-kind replacement alternative would allow for only one travel lane to be maintained during construction that would alternate directions to accommodate peak traffic, while the Proposed Action would allow for two travel lanes to remain open to traffic for most of construction. Therefore, NPS has not evaluated the in-kind replacement of the cantilever structure in further detail in this EA.

Cantilever Structure Rehabilitation

The NPS would remove deteriorated concrete on the deck and retaining walls and repair the concrete to the depth of the top layer of reinforcing steel. The NPS would inject epoxy into cracks to restore concrete to its pre-cracked strength. The NPS would remove or replace the concrete overlay, clean, repair, and/or replace expansion joints and replace safety railings with new railings that meet safety hardware standards.

While rehabilitation would have the least impact and lowest initial cost among all the alternatives, rehabilitation is expected to have a usable lifespan of approximately 25 years (compared to the 75-year lifespan of the replacement alternatives), at which time complete replacement would be required. Rehabilitation would require more frequent maintenance than replacement and is therefore the least desirable alternative from a park resource perspective. Rehabilitation would also have a life cycle cost approximately twice that of the Proposed Action, making it least desirable from a financial perspective. As such, the NPS does not recommend rehabilitation of the cantilever structure and has not evaluated the alternative in further detail in this EA.

Glen Echo Overpass Rehabilitation

Under the rehabilitation alternative, the NPS would perform corrective actions as recommended in the most recent, 2023 FHWA inspection report for the bridge. The NPS would remove trees that have grown from the structure, remove debris and vegetation growth from the deck surface, remove loose rock near the north pier columns, remove unsound concrete, clean and coat exposed rebar, patch spalls and delamination on the northwest pier column and cleaning and painting the safety railings.

The NPS received suggestions during public scoping to use the overpass as an overlook, to explore opportunities to connect the overpass to existing pedestrian and bicycle facilities, and to use the overpass to alleviate traffic. The NPS evaluates the feasibility of these suggestions in the following sections.

MacArthur Boulevard Bikeway Connection

The MacArthur Boulevard Bikeway, located nearest to the southeastern end of the Glen Echo Overpass, offers the most feasible potential connection point for pedestrians and bicyclists to the overpass. According to 2023 LiDAR Point Cloud Data available from the Maryland-National Capital Park and Planning Commission (M-NCPPC), there is an approximate elevation difference of 15-feet between the overpass and the MacArthur Boulevard Bikeway. The maximum grade of a pedestrian access route must not exceed 1:20 (5.0%), as established in the Public Right-of-Way Accessibility Guidelines (PROWAG) published under the ADA and the Architectural Barriers Act (ABA). Therefore, to comply with the maximum grade requirements, the connection between the overpass and the bikeway should span at least 300 feet, while the shortest direct path would be approximately 165 feet. To create a less steep connection that meets accessibility requirements, the NPS would need to construct a series of switchbacks along the access route, or alternatively, the NPS could extend the route and connect to the bikeway further south. In addition to challenges with meeting accessible grades, dense vegetation and utilities located between the overpass and the bikeway create additional obstacles in establishing a pedestrian access route at this location.

C&O Canal Towpath Connection

The northwestern end of the overpass poses a more significant challenge for establishing pedestrian and bicycle access. This section of the overpass is ideally positioned to connect with the C&O Canal towpath. However, it currently terminates at a traffic island, which is separated from the towpath by the two southbound lanes of Clara

Barton Parkway and the canal itself. To create a safe and accessible route for pedestrians and cyclists, the NPS would need to construct one large bridge, or two smaller bridges, to span both the southbound lanes of Clara Barton Parkway and the C&O Canal. According to the 2023 LiDAR Point Cloud Data from the M-NCPPC, there is a significant elevation difference of approximately 75-feet between the overpass and the towpath, further complicating access. If a single large bridge with multiple spans were built, its western landing would need to be positioned west of the towpath due to the limited space between the towpath and the canal. This bridge design would require NPS to integrate substantial switchbacks and/or spiral ramps to address the steep grade changes to comply with the maximum slope requirements set forth by PROWAG.

Alternatively, the NPS could construct two smaller bridges that connect between the southbound lanes of Clara Barton Parkway and the C&O Canal. However, this option would similarly necessitate NPS to incorporate significant switchbacks and/or spirals, similar to the existing pedestrian connections over Clara Barton Parkway at Sycamore Island and Lock 5. Along with the described difficulties in achieving accessible grades, the dense vegetation and soil conditions around the canal may also pose additional challenges in creating a pedestrian and bicyclist access route at this location.

The NPS also considered whether a connection between the MacArthur Boulevard Bikeway and the C&O Canal towpath would provide a notably better connection for pedestrians and bicyclists. The nearest existing pedestrian access route is located approximately 0.3-miles south of the overpass, near Sycamore Island. This existing connection features a small parking lot adjacent to the northeastern end of the MacArthur Boulevard Bikeway. From there, a natural surface path leads to a pedestrian bridge over Clara Barton Parkway, followed by a spiral descent on the west side of the Parkway. This pathway continues as a natural surface trail, leading to another pedestrian bridge over the canal, ultimately culminating in a staircase that descends to the towpath. The current route does present accessibility challenges for individuals with wheels, such as bicyclists and those using mobility devices, particularly because of the natural surface paths and staircase. It also does not offer a designated overlook or place of respite. However, it presents similar or fewer difficulties when compared to the grading and vegetation challenges at the proposed overpass location, and its proximity to the existing parking area off MacArthur Boulevard further enhances its utility.

Capital Crescent Trail Connection

The NPS also considered a pedestrian connection to the Capital Crescent Trail. However, the Capital Crescent Trail diverges from the C&O Canal towpath near the Maryland-Washington, DC border, approximately two miles south of the overpass. As a result, a connection from the overpass to the Capital Crescent Trail would necessitate NPS construct an intermediary connection to either the MacArthur Boulevard Bikeway or towpath, as described above.

Establish Overlook

The NPS examined the structural capacity of the overpass to serve as an overlook. Since the overpass was designed to support vehicle loads, it would be likely to accommodate pedestrians and cyclists without the need for additional structural support. However, the NPS would need to rehabilitate the existing overpass to meet safety and accessibility standards, and to slow down the rate of its deterioration. The NPS anticipates this rehabilitation to include replacing railings, repairing or replacing the deck surface, shoring up areas near columns affected by loose rock and embankment erosion, repairing areas of concrete with exposed rebar and delamination, and other rehabilitation activities.

The NPS also carefully evaluated the viewshed from the overpass to determine its potential as an overlook and pleasant place for respite. The primary challenges NPS identified stem from the overpass' orientation and the dense vegetation that obstructs sightlines surrounding the overpass. To maximize the viewing experience, ideally, visitors on the overpass would have a southwest-facing perspective. This orientation could provide a view of Clara Barton Parkway, the C&O Canal, and the Potomac River. However, achieving these desirable vistas would

necessitate NPS remove dense vegetation and trees that currently hinder visibility. Ongoing maintenance efforts would also be crucial to control vegetation regrowth that would obstruct the view over time.

Establish Westbound Through Traffic Flyover

Use of the Glen Echo Overpass to establish a dedicated westbound through lane separated from the Glen Echo access ramp on Clara Barton Parkway was evaluated in a Traffic and Pedestrian Safety Context Sensitive Solutions Assessment prepared for Glen Echo Park (Kimley-Horn and Associates, Inc. 2019). Under the proposed improvements, the NPS would realign the westbound through lane so that it climbs the hillslope on the north side of Clara Barton Parkway until it is level with the overpass. The NPS would route the new westbound through lane across the overpass. The NPS would then rejoin the new westbound through lane with the existing Clara Barton Parkway alignment at the convergence point with the existing westbound Glen Echo access ramp. The NPS would designate the existing westbound through lane west of the realigned lane as a left-hand exit-only lane to MacArthur Boulevard and would eliminate the existing westbound through movement so that all traffic from the westbound exit lane and eastbound U-turn lane must exit to MacArthur Boulevard. The estimated cost for the proposed improvements was approximately \$10 million at the time of the assessment.

The prospect of utilizing the overpass as an overlook, establishing connections for pedestrians and bicyclists, or to establish a dedicated westbound through lane would require further engineering investigation to fully understand the challenges and possibilities involved. This would, at a minimum, entail a topographic survey, a utility survey, identification of impacted trees and vegetation, structural testing and additional investigation of the existing overpass, stormwater management considerations, as well as geotechnical testing. Currently, the NPS has not identified any potential funding sources that would support this feasibility study or subsequent design and construction.

Given the cumulative challenges—substantial grade differences, environmental and topographical constraints, the need for significant new infrastructure, and the absence of funding—the NPS determined it is not practical or reasonable to pursue rehabilitation of the overpass. The costs and complexities involved in meeting ADA accessibility standards, addressing vegetation and soil conditions, navigating utilities, and constructing new compliant pathways or bridges far outweigh the benefits, especially considering the existence of a nearby alternative pedestrian connection that presents fewer implementation challenges. Rehabilitating the overpass solely for use as an overlook would similarly require unjustifiable investment in vegetation clearance, structural repair, and ongoing maintenance, with only limited scenic value due to obstructed views. Rehabilitating the overpass as part of a westbound through lane construction would also require substantial earthwork, vegetation removal, and funding, and would have unjustifiable effects on the Clara Barton Parkway Cultural Landscape. Considering the constraints discussed above, the NPS does not recommend rehabilitating the overpass and has not evaluated the alternative in further detail in this EA.

Noise Wall(s)

Glen Echo officials and residents urged NPS to address traffic noise impacts on the residents living along Wellesley Circle by constructing a noise barrier along Clara Barton Parkway WB roughly between Cornell Avenue and the Cabin John Parkway off-ramp. While NPS is not opposed to considering a noise wall at the recommended location as part of a future, standalone project, it is not within the scope of the current proposal and therefore will not be addressed further in this EA.

References

Kimley-Horn and Associates, Inc. Glen Echo Park Traffic and Pedestrian Safety Context Sensitive Solutions Assessment. 2019. [Glen Echo Park Safety Context Sensitive Solutions Assessment \(nps.gov\)](https://www.nps.gov/glen-echo/pdfs/GlenEchoParkSafetyContextSensitiveSolutionsAssessment.pdf), accessed May 7, 2025.

Clara Barton Parkway Cantilever and Glen Echo Overpass

Environmental Assessment

Appendix B. Draft Memorandum of Agreement

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

Public Review Draft September 2025

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

STIPULATIONS

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

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

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

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

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

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

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

B. Construction Vibration Monitoring and Resource Protection

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

1. Pre-Construction Planning & Assessment

- Structural Assessment, including detailed visual inspection and structural condition, photographic and laser scan documentation, and identification of the most vulnerable elements of the structure (e.g., arches, vaults, foundations, frescoes, etc.).
- Ground and Vibration Risk Analysis, including a geotechnical study of soil/rock type and vibration propagation.
- Baseline Monitoring Setup, including installation of vibration sensors, setting conservative vibration thresholds, and installing real-time deformation detection sensors (if needed).

2. Construction Methods, Structural Protections, & Monitoring

- Method Selection to Minimize Impact, including use of low-impact drilling methods instead of percussive drilling, and pre-drilling before inserting bolts rather than self-drilling anchors (which generate more vibration).
- Equipment Modifications, including use of vibration-damped drill rigs and rubber-mounted tool connections, reducing drill speed and torque, and avoiding drilling during night-time or high-moisture conditions (which may worsen ground transmission).
- Local Reinforcement, including use of temporary bracing on vulnerable components (e.g., arched windows, cornices, cracked walls), installing tie rods or tension cables across cracked or load-bearing walls (can be removed post-work), and laying vibration-isolating mats under sensitive interior features (e.g., statues, furniture, fragile finishes).
- Real-Time Vibration Monitoring, including setting automated alerts when vibration thresholds are approached or exceeded and using portable vibration loggers to validate on-

site observations.

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

3. Post-Construction Surveys & Monitoring

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

C. Construction Noise Monitoring and Resource Protection

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

1. Pre-Construction Planning, Assessment, and Coordination

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

2. Construction Noise Control, Monitoring, & Engagement

- Equipment and Technique Modifications, as identified in the approved Noise Suppression Plan, to minimize construction noise.
- Work Schedule Adjustments, including limiting high-noise work to midday (e.g., 9:30

a.m.–3:30 p.m.), prohibiting loud work during ballroom events (with calendar coordination), and using a “quiet hours” policy for mornings, evenings, and weekends.

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

D. Public Interpretation Signage

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

1. Purpose and Interpretive Goals

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

2. Content Development

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

3. Design Specifications

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

4. Consultation and Review

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

5. Location and Installation

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

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

6. Documentation and Reporting

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

7. Maintenance

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

II. Standards and Special Conditions

A. Definitions

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

B. Project Standards

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

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

III. Unanticipated Archeological Discoveries

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

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

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

IV. Administrative Stipulations

A. Amendments

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

B. Termination

The following process will be followed to terminate this Agreement:

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

C. Dispute Resolution

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

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

D. Reporting Requirement for this Agreement

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

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

E. Duration of this Agreement

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

F. Effective Date of this Agreement

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

G. Anti-Deficiency Act Statement

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

H. Execution of this Agreement in Counterparts

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

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

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

Ms. Jennifer Madello
Superintendent
George Washington Memorial Parkway

Date

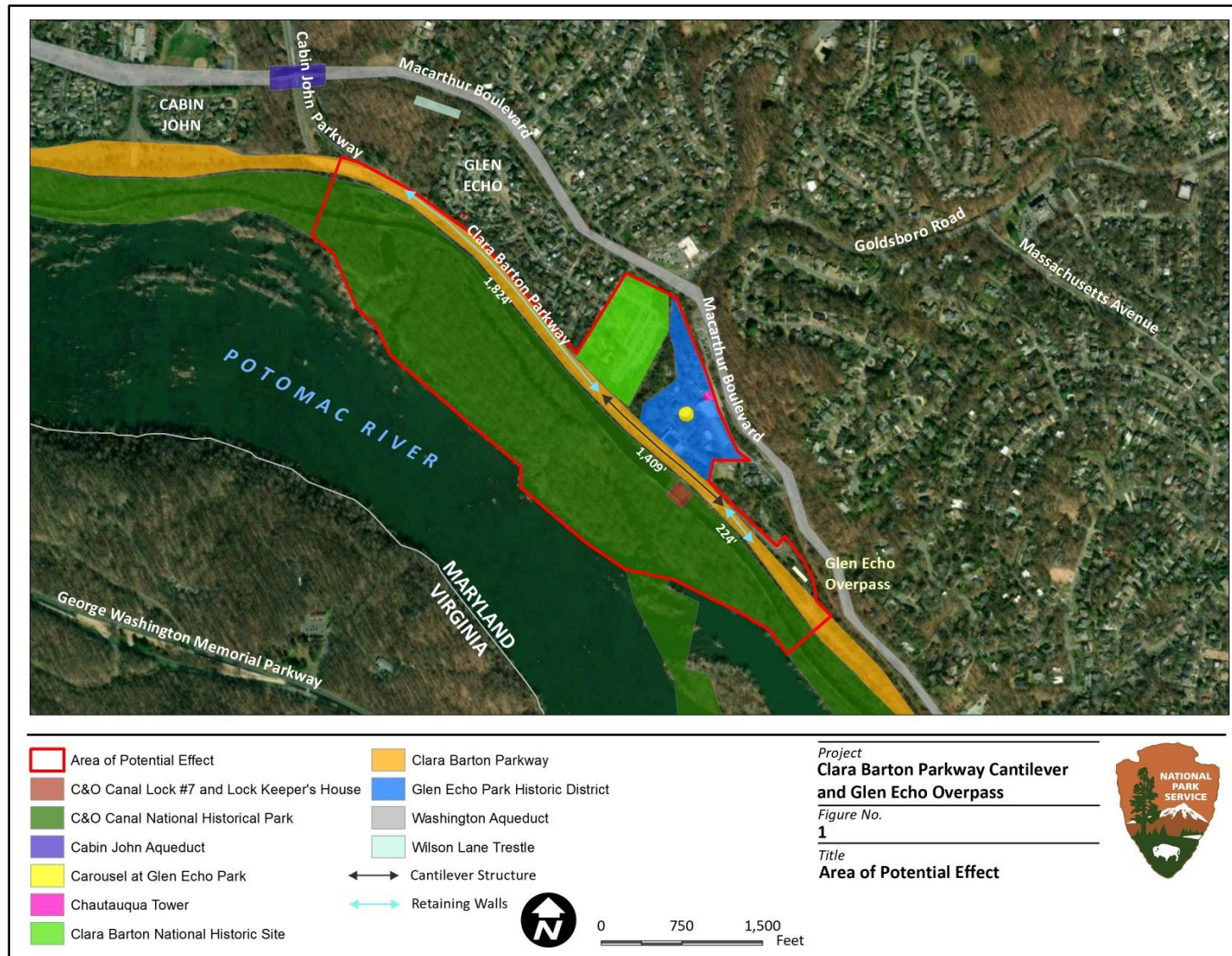
**MEMORANDUM OF AGREEMENT
BETWEEN THE
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MARYLAND STATE HISTORIC PRESERVATION OFFICE
REGARDING THE
CLARA BARTON PARKWAY CANTILEVER AND GLEN ECHO OVERPASS**

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust

Date

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

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



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Clara Barton Parkway Cantilever and Glen Echo Overpass

Environmental Assessment

Appendix C. Agency Correspondence

DISCLAIMER

Section 508 Compliance and Appendix C

At present, the accessibility of Appendix C materials in compliance with Section 508 of the Rehabilitation Act is quite limited. If you use assistive technology and the format of these pages prevents you from obtaining necessary data, please contact the Office of the Superintendent at gwmp_superintendent@nps.gov. Contact the administrator of this website at pepc_helpdesk@nps.gov for other technical assistance.

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United States Department of the Interior

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

December 18, 2024

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

Attn: Ms. Becky Roman, Office of Preservation Services

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

Dear Ms. Hughes:

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

DESCRIPTION OF THE UNDERTAKING

Cantilever and Retaining Walls

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

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

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

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

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

Bridge to Nowhere

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

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

AREA OF POTENTIAL EFFECT

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

HISTORIC STRUCTURES AND DISTRICTS

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

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

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

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

ARCHEOLOGICAL RESOURCES

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

Larrabee, Edward McMillan

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

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

Franklin, Katherine, and Sarah Gregory

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

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

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

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

SECTION 106 CONSULTATION AND NEPA COORDINATION

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

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

CONSULTING PARTIES

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

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

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

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

Sincerely,

A handwritten signature in black ink, appearing to read 'CSmith', is positioned above the typed name.

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter



Photo: Cantilever structure from southbound Clara Barton Parkway



Photo: Cantilever structure from northbound Clara Barton Parkway

Clara Barton Parkway Cantilever and Bridge to Nowhere

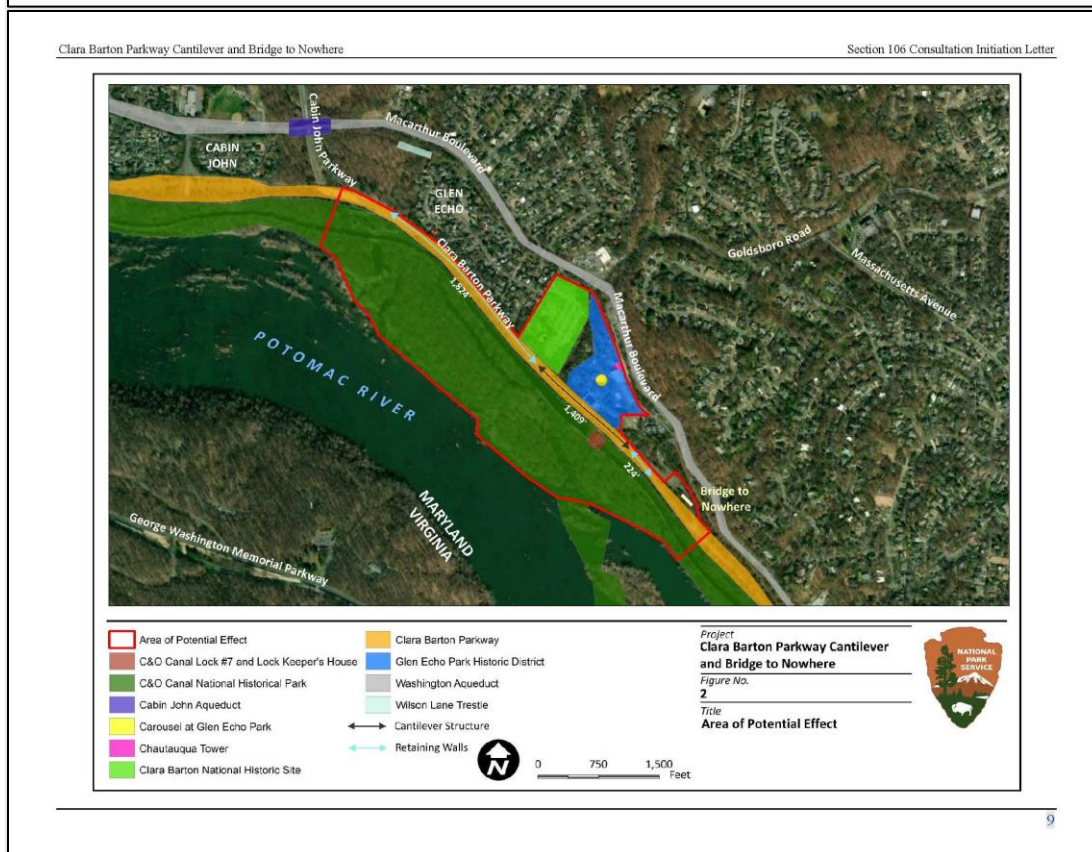
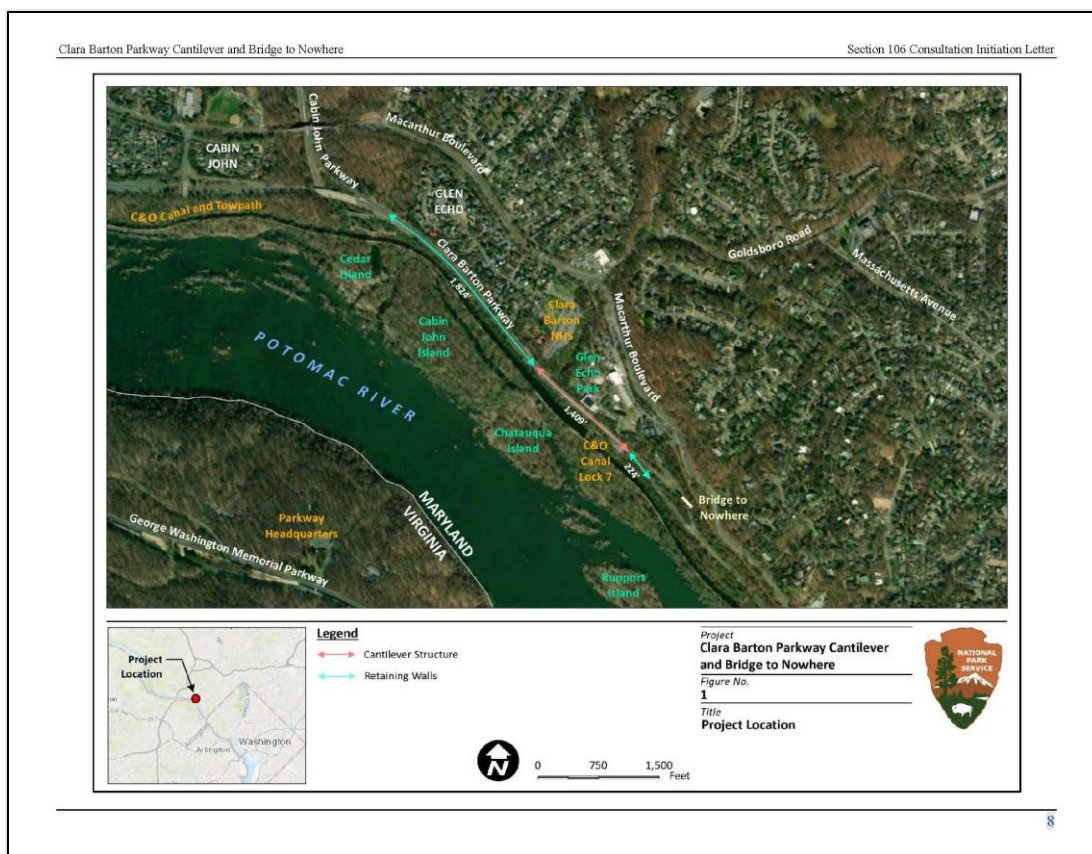
Section 106 Consultation Initiation Letter



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



Photo: Bridge to nowhere from bridge deck



Schrader, Brett

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

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

Megan

--

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

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

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

Date: January 14, 2025

To: Megan Bailey
National Park Service

Project Name: Clara Barton Parkway Cantilever Rehabilitation/Replacement

County: Montgomery County

Agency: National Park Service

Second Agency: -- Not noted --

MHT Log #: 202405432

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

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

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

Becky Roman becky.roman@maryland.gov



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

MHT.Maryland.gov
Planning.Maryland.gov

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United States Department of the Interior

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

February 27, 2025

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

Attn: Ms. Becky Roman, Office of Preservation Services

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

Dear Ms. Hughes:

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

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

Preliminary Effects Determination

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

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

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

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

Agency / Consulting Parties Meeting

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

Public Scoping Meeting

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

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

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

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

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

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

Clara Barton Parkway Cantilever and Glen Echo Overpass

Section 106 Continued Consultation

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

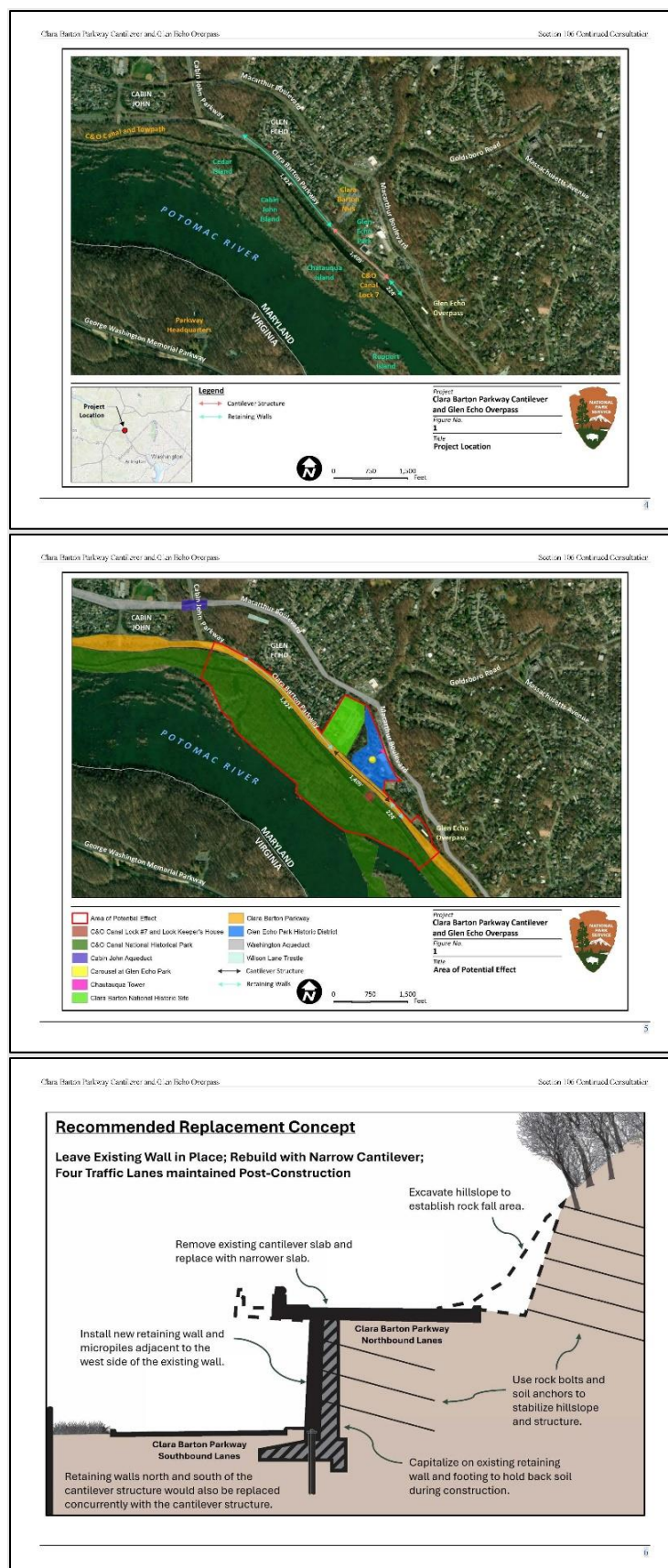
Sincerely,

**JENNIFER
MADELLO**

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

Jennifer Madello, Superintendent
George Washington Memorial Parkway

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



Schrader, Brett

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

FYI

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

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

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

Good Morning,

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

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

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

Happy Wednesday,
Becky



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

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

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

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

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

Jennifer Madello
Superintendent
George Washington Memorial Parkway

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Schrader, Brett

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

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

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

Good afternoon Jen and Megan,

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

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

Have a great rest of your week,
Becky



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

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

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

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

We appreciate your participation and feedback.

Jennifer Madello
Superintendent
George Washington Memorial Parkway

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United States Department of the Interior

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

June 3, 2025

VIA EMAIL: NO HARD COPY TO FOLLOW

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

Dear Consulting Parties:

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

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

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

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

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

Clara Barton Parkway Cantilever and Glen Echo Overpass

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

Sincerely,

Jennifer Madello
Superintendent
George Washington Memorial Parkway

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

Signature: Elizabeth Hagan Date: 7/01/2025

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

Signature: _____ Date: _____

Comments:

Schrader, Brett

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

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

--

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

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

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

Date: August 13, 2025

To: Megan Bailey
National Park Service

Project Name: Clara Barton Parkway Cantilever Rehabilitation/Replacement Draft MOA

County: Montgomery County

Agency: National Park Service

Second Agency: -- Not noted --

MHT Log #: 202503575

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

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

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

Becky Roman becky.roman@maryland.gov



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

MHT.Maryland.gov
Planning.Maryland.gov

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

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

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

Schrader, Brett

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

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

On July 9, 2025, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the potential adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, Criteria for Council Involvement in Reviewing Individual Section 106 Cases, of our regulations, "Protection of Historic Properties" (35 CFR Part 800) implementing Section 106 of the National Historic Preservation Act, does not apply to this undertaking. Accordingly, we do not believe our participation in the consultation to resolve adverse effects is needed.

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

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

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

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



www.achp.gov
www.facebook.com/usachp
@usachp – X and Instagram
<https://www.youtube.com/channel/UCbReel63BktsEqSIdL396Ng>

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

Hello,

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

NPS appreciates ACHP's attention and consideration.

Best,
Megan

--

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

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

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



United States Department of the Interior

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

December 18, 2024

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

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

Dear Dr. Haire:

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

DESCRIPTION OF THE UNDERTAKING

Cantilever and Retaining Walls

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

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

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

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

Bridge to Nowhere

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

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

AREA OF POTENTIAL EFFECT

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

HISTORIC STRUCTURES AND DISTRICTS

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

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

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

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

ARCHEOLOGICAL RESOURCES

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

Larrabee, Edward McMillan

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

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

Franklin, Katherine, and Sarah Gregory

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

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

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

SECTION 106 CONSULTATION AND NEPA COORDINATION

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

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

CONSULTING PARTIES

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

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

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

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

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

Sincerely,

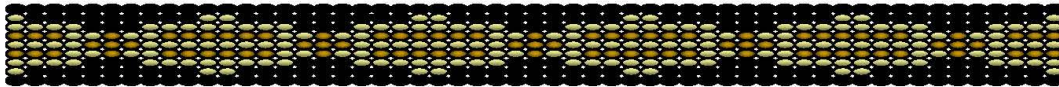
A handwritten signature in black ink, appearing to read 'CSmith'.

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway

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

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

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



January 21, 2025

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

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

Dear Ms. Bailey,

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

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

Sincerely,

Wenonah G. Haire
Tribal Historic Preservation Officer



United States Department of the Interior

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

December 18, 2024

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

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

Dear Assistant Chief Adkins:

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

DESCRIPTION OF THE UNDERTAKING

Cantilever and Retaining Walls

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CONSULTING PARTIES

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

Maryland Historical Trust
National Capital Planning Commission
NPS, C&O Canal NHP
C&O Canal Trust
C&O Canal Association
Montgomery Planning – Historic Preservation Office
Heritage Montgomery
Montgomery History
Montgomery Preservation
Preservation Maryland
Glen Echo Park Partnership for Arts and Culture
Catawba Nation
Chickahominy Indian Tribe

Chickahominy Indians Eastern Division
Delaware Nation
Eastern Shawnee of Oklahoma
Monacan Indian Nation
Nansemond Indian Tribe
Pamunkey Indian Tribe
Rappahannock Tribe of Virginia
Seneca Cayuga Nation
Shawnee Tribe
Upper Mattaponi Indian Tribe
Accohannock Indian Tribe
Piscataway Conoy
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We look forward to beginning the Section 106 consultation process for this project. If you have any questions or preliminary feedback related to the project, the draft APE, historic properties identified within the APE, the need for archeological assessment, or the list of consulting parties, please contact

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

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

Sincerely,

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

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



United States Department of the Interior

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

December 18, 2024

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

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

Dear Ms. Dickerson:

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

DESCRIPTION OF THE UNDERTAKING

Cantilever and Retaining Walls

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

retaining walls. A preferred solution will be identified using value-based analyses, as well as public and agency input during the Section 106 and National Environmental Policy Act (NEPA) compliance processes. Photographs of the cantilever structure from northbound and southbound Clara Barton Parkway are attached to this letter.

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

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

Bridge to Nowhere

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

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AREA OF POTENTIAL EFFECT

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HISTORIC STRUCTURES AND DISTRICTS

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

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

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

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SECTION 106 CONSULTATION AND NEPA COORDINATION

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

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

CONSULTING PARTIES

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

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

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

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

Sincerely,

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

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



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

From Jessica Phillips <Jessica.Phillips@cit-ed.org>

Date Mon 12/30/2024 2:13 PM

To GWMP Superintendent, NPS <GWMP_Superintendent@nps.gov>

Cc Bailey, Megan M <megan_bailey@nps.gov>; Joseph, Maureen <Maureen_Joseph@nps.gov>

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

Thank you for contacting us regarding the proposed project.

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

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

However, the Tribe requests to be contacted if:

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

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

Blessings,

Jessica Phillips

Tribal Environmental Director

Tribal Consultations Point of Contact

Chickahominy Indian Tribe - Eastern Division

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

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

Dear Ms. Dickerson:

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Acting Superintendent
George Washington Memorial Parkway



United States Department of the Interior

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

December 18, 2024

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

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

Dear Ms. Lucas:

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

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George Washington Memorial Parkway



United States Department of the Interior

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

December 18, 2024

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

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

Dear Ms. Nuckolls:

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Bridge to Nowhere

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

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

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

SECTION 106 CONSULTATION AND NEPA COORDINATION

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

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

CONSULTING PARTIES

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

Maryland Historical Trust
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NPS, C&O Canal NHP
C&O Canal Trust
C&O Canal Association
Montgomery Planning – Historic Preservation Office
Heritage Montgomery
Montgomery History
Montgomery Preservation
Preservation Maryland
Glen Echo Park Partnership for Arts and Culture
Catawba Nation
Chickahominy Indian Tribe

Chickahominy Indians Eastern Division
Delaware Nation
Eastern Shawnee of Oklahoma
Monacan Indian Nation
Nansemond Indian Tribe
Pamunkey Indian Tribe
Rappahannock Tribe of Virginia
Seneca Cayuga Nation
Shawnee Tribe
Upper Mattaponi Indian Tribe
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We look forward to beginning the Section 106 consultation process for this project. If you have any questions or preliminary feedback related to the project, the draft APE, historic properties identified within the APE, the need for archeological assessment, or the list of consulting parties, please contact

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

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

Sincerely,

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

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



United States Department of the Interior

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

December 18, 2024

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

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

Dear Chief Shields:

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

DESCRIPTION OF THE UNDERTAKING

Cantilever and Retaining Walls

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

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

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

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

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Chickahominy Indians Eastern Division
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Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

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

Sincerely,

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

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



United States Department of the Interior

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

December 18, 2024

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

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

Re: Initiation of Section 106 Consultation, Clara Barton Parkway Cantilever and Bridge to Nowhere
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CONSULTING PARTIES

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

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NPS, C&O Canal NHP
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Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

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

Sincerely,

A handwritten signature in black ink, appearing to read 'CSmith', is positioned above the typed name.

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



United States Department of the Interior

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

December 18, 2024

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

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

Dear Chief Gray:

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

DESCRIPTION OF THE UNDERTAKING

Cantilever and Retaining Walls

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

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

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

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

Bridge to Nowhere

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

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

AREA OF POTENTIAL EFFECT

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

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

Historic District. The Cabin John Aqueduct (M: 35-37) and the Washington Aqueduct (M: 29-49) are near, but not within, the draft APE. These historic properties are identified on the APE map provided as **Figure 2**.

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Clara Barton Parkway Cantilever and Bridge to Nowhere

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NATIONAL PARK SERVICE
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December 18, 2024

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

CC: Marion Werkheiser, marion@culturalheritagepartners.com

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Clara Barton Parkway Cantilever and Bridge to Nowhere

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Megan Bailey, Cultural Resources Program Manager for the George Washington Memorial Parkway, at
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Sincerely,

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Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



United States Department of the Interior

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

December 18, 2024

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

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

Dear Mr. Tarrant:

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

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

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

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

Bridge to Nowhere

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

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

AREA OF POTENTIAL EFFECT

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

HISTORIC STRUCTURES AND DISTRICTS

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

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

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

ARCHEOLOGICAL RESOURCES

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

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

SECTION 106 CONSULTATION AND NEPA COORDINATION

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

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

CONSULTING PARTIES

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

Maryland Historical Trust
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NPS, C&O Canal NHP
C&O Canal Trust
C&O Canal Association
Montgomery Planning – Historic Preservation Office
Heritage Montgomery
Montgomery History
Montgomery Preservation
Preservation Maryland
Glen Echo Park Partnership for Arts and Culture
Catawba Nation
Chickahominy Indian Tribe

Chickahominy Indians Eastern Division
Delaware Nation
Eastern Shawnee of Oklahoma
Monacan Indian Nation
Nansemond Indian Tribe
Pamunkey Indian Tribe
Rappahannock Tribe of Virginia
Seneca Cayuga Nation
Shawnee Tribe
Upper Mattaponi Indian Tribe
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Piscataway Conoy
Piscataway Indian Tribe

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

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

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

Sincerely,

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

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



United States Department of the Interior

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

December 18, 2024

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

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

Dear Ms. Tipton:

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

DESCRIPTION OF THE UNDERTAKING

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C&O Canal Association
Montgomery Planning – Historic Preservation Office
Heritage Montgomery
Montgomery History
Montgomery Preservation
Preservation Maryland
Glen Echo Park Partnership for Arts and Culture
Catawba Nation
Chickahominy Indian Tribe

Chickahominy Indians Eastern Division
Delaware Nation
Eastern Shawnee of Oklahoma
Monacan Indian Nation
Nansemond Indian Tribe
Pamunkey Indian Tribe
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We look forward to beginning the Section 106 consultation process for this project. If you have any questions or preliminary feedback related to the project, the draft APE, historic properties identified within the APE, the need for archeological assessment, or the list of consulting parties, please contact

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

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

Sincerely,

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

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway

Schrader, Brett

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

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

Maureen

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

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

I'm a proud graduate of the GOAL Leadership Academy. Ask me about the program!

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

Superintendent
George Washington Memorial Parkway

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

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

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

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

Sincerely,



Erin Paden

TRIBAL HISTORIC PRESERVATION

SPECIALIST

Office: (918) 542-2441, x140

Email: epaden@shawnee-tribe.com

29 S Hwy 69A

Miami, OK 74354

shawnee-tribe.com

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

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

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



United States Department of the Interior

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

December 18, 2024

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

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

Dear Chief Adams:

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

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

HISTORIC STRUCTURES AND DISTRICTS

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

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

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

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

ARCHEOLOGICAL RESOURCES

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

Larrabee, Edward McMillan

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

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

Franklin, Katherine, and Sarah Gregory

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

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

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

SECTION 106 CONSULTATION AND NEPA COORDINATION

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

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

CONSULTING PARTIES

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

Maryland Historical Trust
National Capital Planning Commission
NPS, C&O Canal NHP
C&O Canal Trust
C&O Canal Association
Montgomery Planning – Historic Preservation Office
Heritage Montgomery
Montgomery History
Montgomery Preservation
Preservation Maryland
Glen Echo Park Partnership for Arts and Culture
Catawba Nation
Chickahominy Indian Tribe

Chickahominy Indians Eastern Division
Delaware Nation
Eastern Shawnee of Oklahoma
Monacan Indian Nation
Nansemond Indian Tribe
Pamunkey Indian Tribe
Rappahannock Tribe of Virginia
Seneca Cayuga Nation
Shawnee Tribe
Upper Mattaponi Indian Tribe
Accohannock Indian Tribe
Piscataway Conoy
Piscataway Indian Tribe

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

Clara Barton Parkway Cantilever and Bridge to Nowhere

Section 106 Consultation Initiation Letter

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

Sincerely,

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

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway



United States Department of the Interior

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



In Reply Refer To:

04/09/2025 14:28:21 UTC

Project Code: 2025-0080745

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

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

To Whom It May Concern:

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

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

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

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

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(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

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Attachment(s):

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

OFFICIAL SPECIES LIST

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

This species list is provided by:

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

Project code: 2025-0080745

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PROJECT SUMMARY

Project Code: 2025-0080745
Project Name: Clara Barton Parkway Cantilever Rehabilitation / Replacement and Glen Echo Overpass Demolition
Project Type: Road/Hwy - Maintenance/Modification
Project Description: The National Park Service (NPS) is conducting planning activities for the Clara Barton Parkway Cantilever and Glen Echo Overpass Environmental Assessment (EA). The project would rehabilitate or replace the 1,409-foot cantilever structure and 2,048 feet of adjacent retaining walls on Clara Barton Parkway between Cabin John Parkway and the Macarthur Boulevard exit ramp in Montgomery County, Maryland. The project would also include demolition of an associated feature, the Glen Echo Overpass.

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

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

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

Project Location:

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



Counties: Montgomery County, Maryland

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ENDANGERED SPECIES ACT SPECIES

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

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

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

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

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

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MAMMALS

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

INSECTS

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

CRITICAL HABITATS

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

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

**USFWS NATIONAL WILDLIFE REFUGE LANDS
AND FISH HATCHERIES**

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

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

WETLANDS

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

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

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

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RIVERINE

- R5UBH

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IPAC USER CONTACT INFORMATION

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



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

March 24, 2024

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

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

Dear Ms. Madello:

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

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

Sincerely,

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

ER# 2025.0587.mo