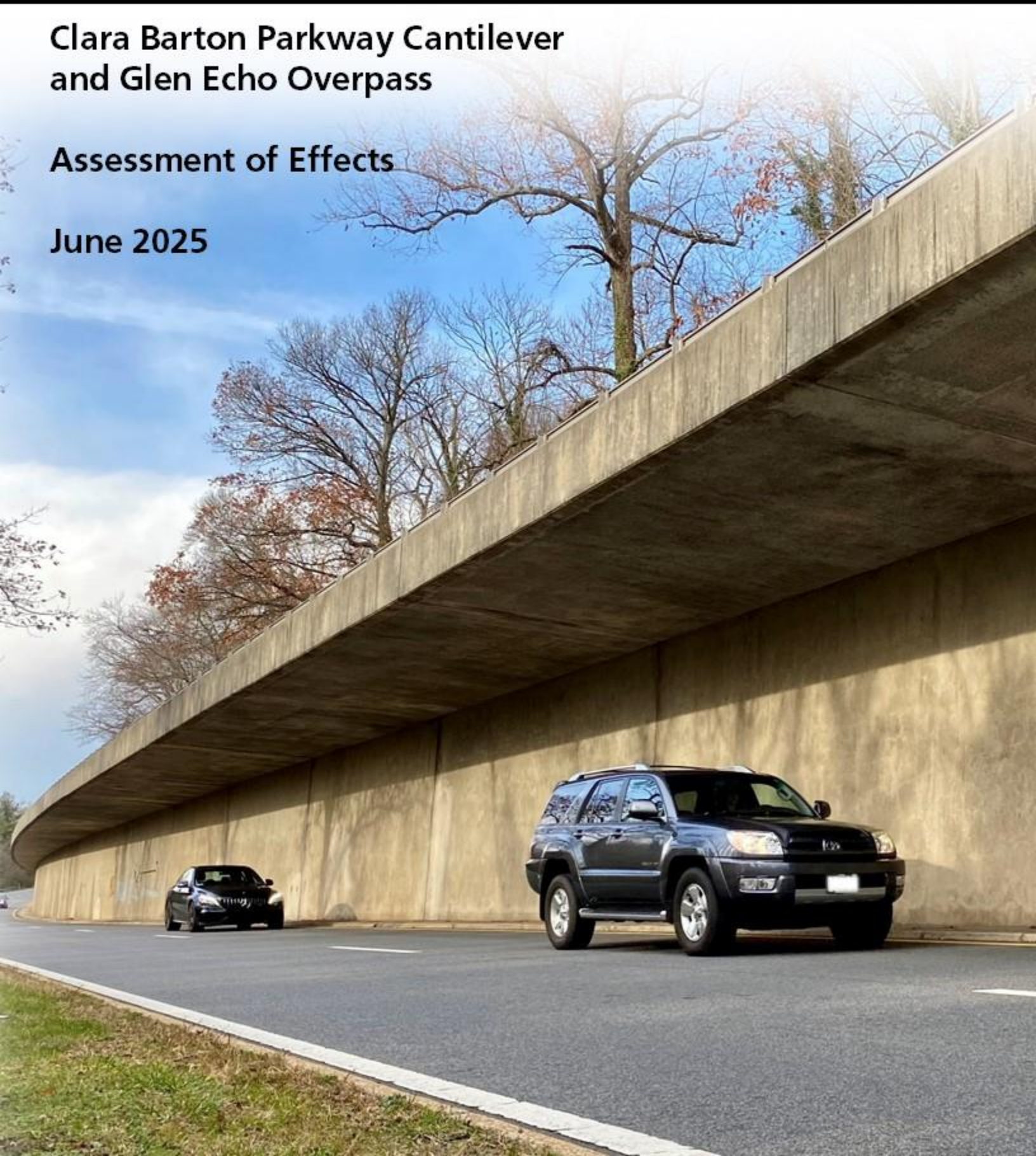
National Park Service
U.S. Department of the Interior

George Washington Memorial Parkway
Maryland

Clara Barton Parkway Cantilever and Glen Echo Overpass

Assessment of Effects

June 2025



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ON THE COVER

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

ACRONYMS AND ABBREVIATIONS

ABA	Architectural Barriers Act
ADA	Americans with Disabilities Act
APE	Area of Potential Effects
C&O	Chesapeake and Ohio
CFR	Code of Federal Regulations
EA	Environmental Assessment
FHWA	Federal Highway Administration
HAER	Historic American Engineering Record
M-NCPPC	Maryland-National Capital Park and Planning Commission
MHT	Maryland Historical Trust
MOA	Memorandum of Agreement
National Register	National Register of Historic Places
NEPA	National Environmental Policy Act of 1969
NPS	National Park Service
PROWAG	Public Right-of-Way Accessibility Guidelines

INTRODUCTION

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

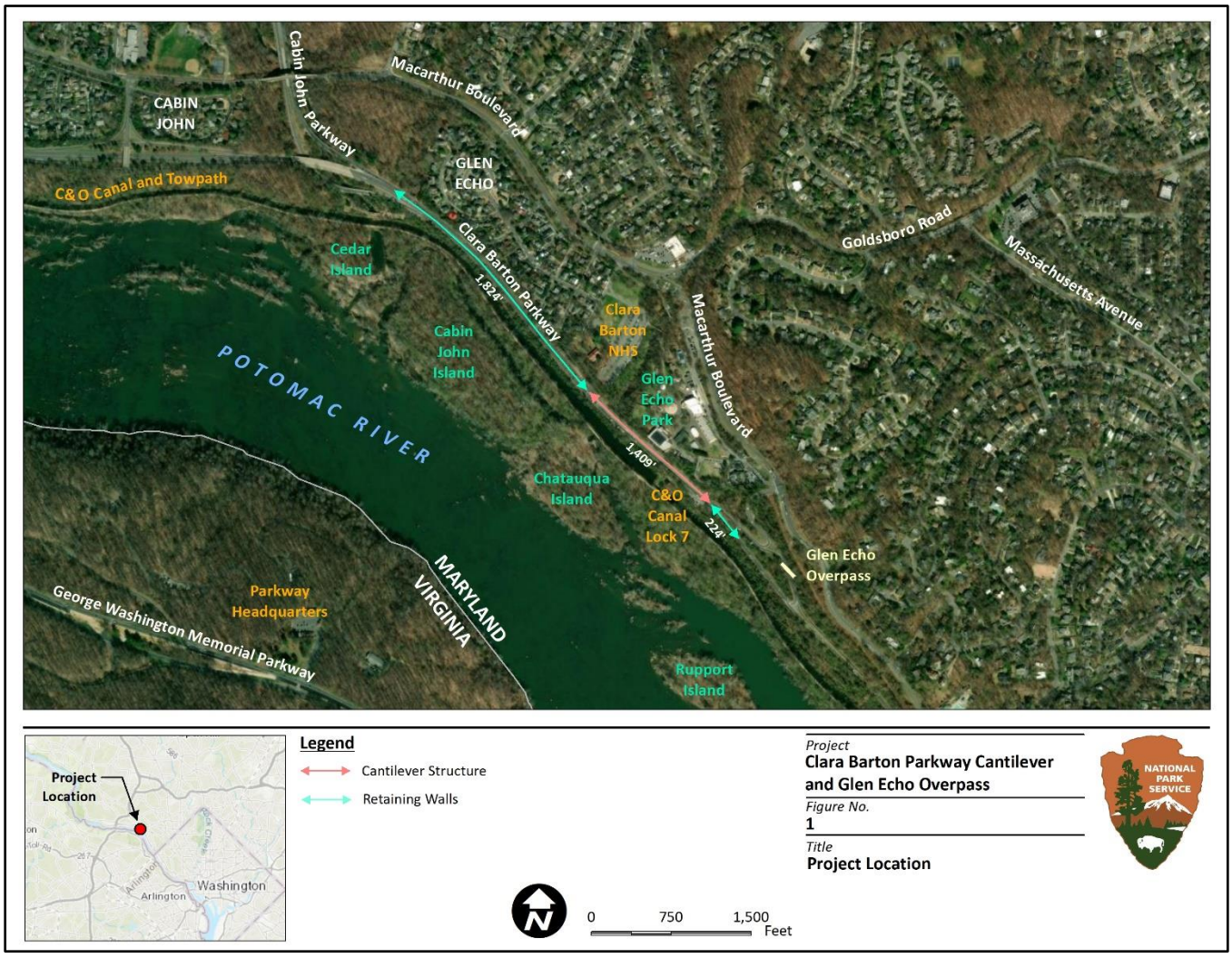

Figure 1. Location of the Clara Barton Parkway Cantilever and Glen Echo Overpass

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 (C&O) Canal 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 and the Washington Aqueduct that represent the history of the landscape as an infrastructural corridor instead of panoramic views like those seen from the George Washington Memorial Parkway in Virginia.

The cantilever structure and associated retaining walls were last rehabilitated in 1992 and spot repairs were performed in 2020. The Federal Highway Administration (FHWA) conducted an in-depth special study of the concrete cantilever structure in 2020to determine the level of deterioration and future rehabilitation or reconstruction needs. The inspection indicated that the cantilever structure is 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. In 2023, a comprehensive study conducted on the adjacent retaining walls revealed they are also nearing the end of their useful service life. 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-carrying capacity of the cantilever structure and severely impact its structural integrity. The NPS will be required to implement weight restrictions on the westbound cantilevered lane of Clara Barton Parkway (**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 westbound cantilevered lane (**Figure 2**, top) and on the eastbound 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 people use Clara Barton Parkway daily, making it an essential thoroughfare in the area.

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

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 lane of Clara Barton Parkway but is unconnected to the surrounding roadway network.

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 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.

SECTION 106 CONSULTATION

The NPS formally initiated consultation with Maryland Historical Trust (MHT) pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations (36 Code of Federal Regulations [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 responded on December 30, 2024, that the project is outside their area of interest, and the Shawnee Tribe provided the same response on February 11, 2025. 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 report.

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, NPS committed to preparing this Assessment of Effects, which describes the potential effects of the alternatives and modifications developed for the undertaking on the historic properties within the APE. This report introduces 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. Section 106 consultation correspondence can be found in **Appendix A**.

CHOOSING A PREFERRED ALTERNATIVE

Since initiating consultation, personnel from George Washington Memorial Parkway – the NPS administrative unit responsible for Clara Barton Parkway, the NPS National Capital Region Office, the NPS Denver Service Center, and the FHWA, held an internal workshop to identify a recommended design concept for the cantilever structure considering both monetary and non-monetary factors. Rehabilitation and several replacement concepts were evaluated during the workshop, which culminated in a recommended replacement concept.

Additionally, the NPS held a public scoping period from March 17 to April 17, 2025. The NPS held a combined agency scoping / consulting party meeting on March 17, 2025, and a public scoping meeting on March 19, 2025, during which participants were provided an opportunity to review a cantilever structure rehabilitation concept and two possible replacement concepts. MHT and an extensive list of potential consulting parties were invited to participate in both meetings.

The NPS used the results of the internal workshop and input during public and agency scoping to identify the NPS Preferred Alternative, which serves as the proposed undertaking for the purposes of the Section 106 project review and compliance process. Compliance activities are being completed in accordance with the National Environmental Policy Act (NEPA) concurrently with the Section 106 process.

PROPOSED UNDERTAKING

This section of the Assessment of Effects describes the proposed Clara Barton Parkway Cantilever and Glen Echo Overpass Project, which is also the proposed undertaking. **Appendix B** details various alternatives and modifications under consideration in the agency's efforts to avoid, minimize, or mitigate adverse effects.

CLARA BARTON PARKWAY CANTILEVER AND GLEN ECHO OVERPASS PROJECT (THE UNDERTAKING)

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 will install a new retaining wall adjacent to the existing structure using soil anchors and reinforcing steel posts called micropiles after removing the existing cantilever structure (**Figure 3**, middle). Using this method, the new retaining wall will bear the load of the structure entirely, relieving the old wall of any structural burden. Afterward, the NPS will excavate approximately 12 feet of hillside adjacent to the westbound lanes of Clara Barton Parkway to allow for installation of a new cantilevered slab with a narrower overhang, approximately 6 feet shorter than the existing structure at its widest section, and to establish a drainage ditch and rock fall area for traffic safety. The NPS will then install rock bolts into the hillside to stabilize the newly exposed bedrock (**Figure 3**, bottom), and the NPS will also install new safety railings that meet current safety hardware standards to complete the cantilever structure replacement.

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

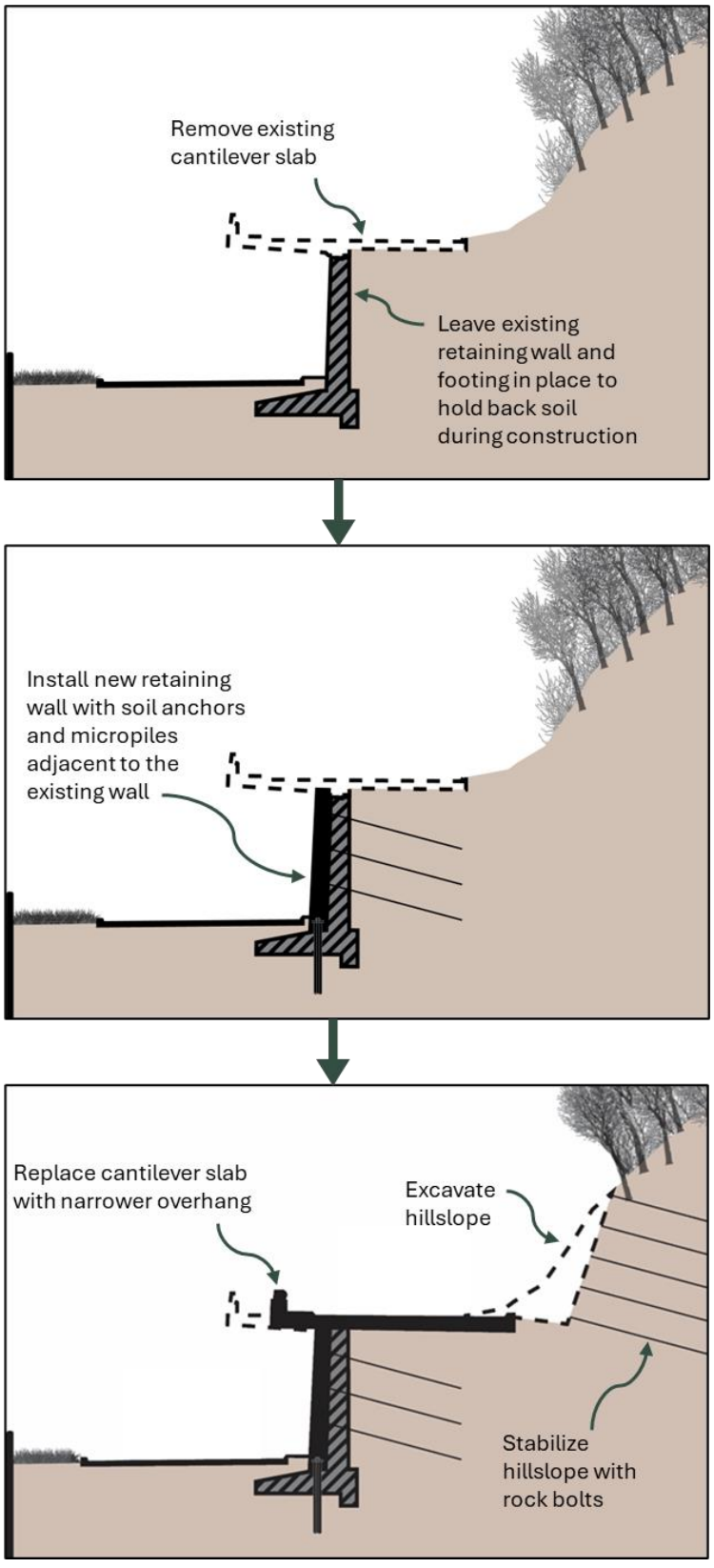

Figure 3. Conceptual Schematic of the Proposed Cantilever Structure Replacement

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

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

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

AREA OF POTENTIAL EFFECT

The Area of Potential Effect (APE) is the geographic area or areas in which an undertaking takes place and may cause direct or indirect alterations in the character or use of historic properties, if any such properties exist. Due to the terrain, the APE consists primary of Clara Barton Parkway but was expanded, where appropriate, to capture nearby historic properties where the undertaking may cause effects.

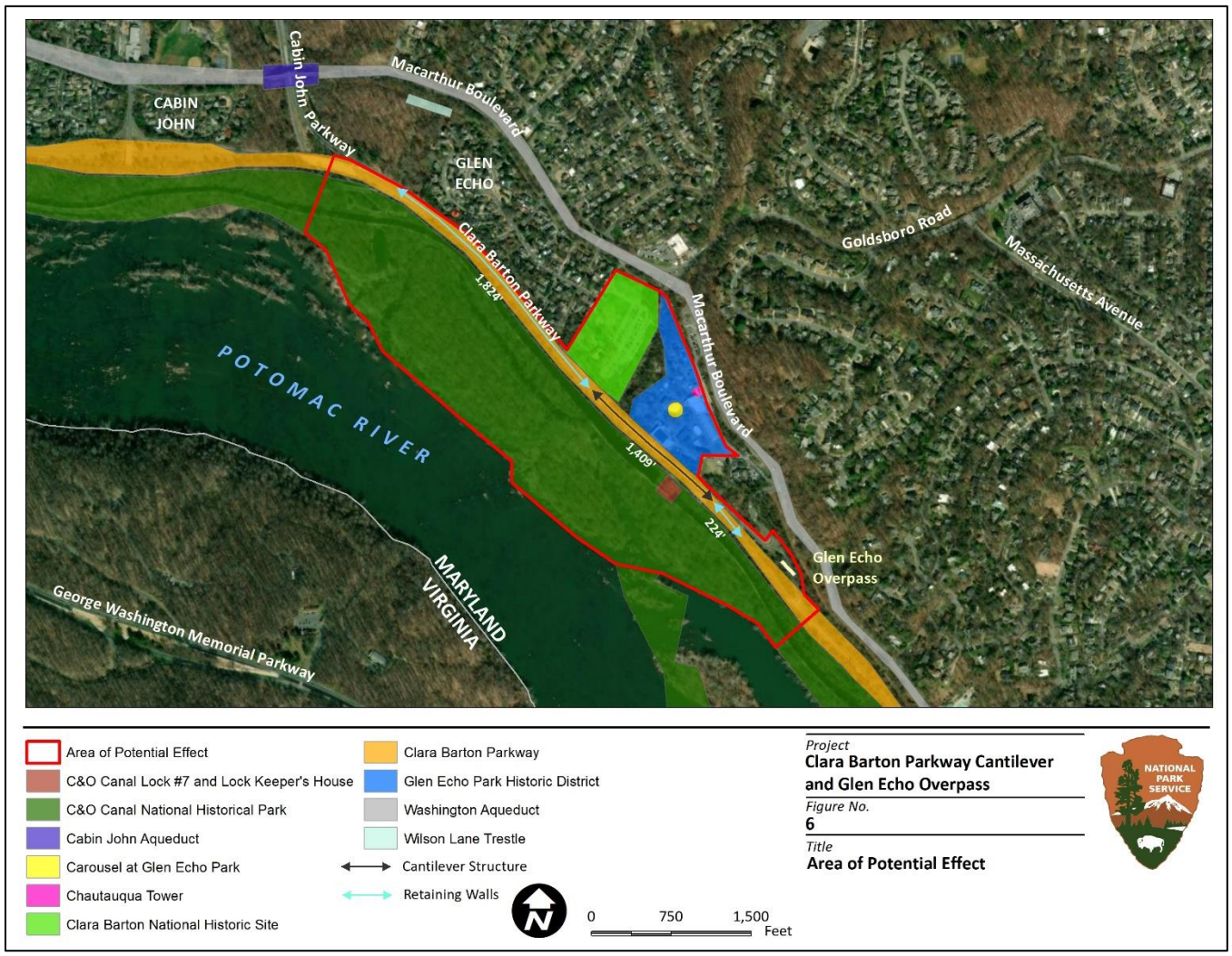

Figure 6. Area of Potential Effect

IDENTIFICATION OF HISTORIC PROPERTIES

The NPS identified the following historic properties listed in the National Register of Historic Places (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), and C&O Canal National Historical Park (NHP) (M: 12-46). Additionally, the Carousel (M: 35-39) at Glen Echo Park is individually listed in the National Register and the Chautauqua Tower (M: 35-26) has been determined eligible for listing. Both

contribute to the significance of the Glen Echo Park Historic District. Finally, 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. These historic properties are identified on the APE map provided as **Figure 6**.

There are no known archeological resources in the APE. The area where ground-disturbing activities will 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. MHT recommended that no archeological investigations are necessary in their response to consultation initiation, and the NPS concurred. Therefore, no further historic property identification efforts for archeological resources will be conducted and archeological resources are not considered further for assessment of adverse effects.

GEORGE WASHINGTON MEMORIAL PARKWAY / CLARA BARTON PARKWAY (M: 35-61)

Clara Barton Parkway (M: 35-61) is a 6.8-mile-long section of road that forms part of the larger George Washington Memorial Parkway and extends from MacArthur Boulevard in Carderock, Maryland east to Canal Road at the Chain Bridge in Washington, DC (**Figure 7**). Clara Barton Parkway was constructed as part of the broader plan with the George Washington Memorial Parkway. The Clara Barton Parkway Cultural Landscape totals 260 acres.

Figure 7. Eastbound Clara Barton Parkway

The George Washington Memorial Parkway was designated as part of the National Park System in 1930 and was constructed in two phases. The first phase was completed in 1929, and the second in 1970. The full construction plan was never carried out completely. Clara Barton Parkway was the last section of the George Washington Memorial Parkway built, and the only part of the Parkway constructed in Maryland.

Clara Barton Parkway construction took place in stages: extensive grading in 1957-1959, paving from 1964-1965, and in 1966-1968, the major bridge construction projects were completed. The final segment of the road was paved in 1970. The Maryland section was named in honor of Clara Barton, founder of the Red Cross who lived nearby, in what is now Clara Barton National Historical Site to differentiate areas of the George Washington Memorial Parkway in Virginia and Maryland. By an Act of Congress, the Parkway was officially commemorated in

honor of Barton on November 28, 1989. The George Washington Memorial Parkway and the Clara Barton Parkway were listed as one resource in the National Register in 1995 under Criteria B and C as a commemoration of George Washington and Clara Barton (B), and the associated landscape architecture (C) (Krakow 1993).

Clara Barton Parkway has undergone little alteration since its original construction. A major rehabilitation was completed in 1993 that replaced the concrete overlay on the cantilever structure and retaining walls and changed their appearance from what was originally designed. However, Clara Barton Parkway still retains its integrity of feeling, association, setting, materials, workmanship, design, and location. As such, Clara Barton Parkway remains culturally significant for its association with the broader planning of Washington, DC, the development of the parkway system of Maryland and Northern Virginia, and the conservation of the Potomac River and the Potomac River Gorge. Though the plan for the George Washington Memorial Parkway was never fully realized, Clara Barton Parkway and surrounding areas reflect conservation efforts by the NPS through land purchases and stewardship (Krakow 1993). The cantilever structure and Glen Echo Overpass are two of the many features that contribute to the significance of Clara Barton Parkway.

Clara Barton Parkway also remains significant because of its unique cultural heritage. As a cultural landscape, Clara Barton Parkway is defined by several landscape characteristics and features that contribute to its integrity. **Table 1** 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 1. 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	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.
Topography	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.
Vegetation	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.

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 the George Washington Memorial 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 the George Washington Memorial 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 the George Washington Memorial 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 the George Washington Memorial 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 the George Washington Memorial 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.

Source: Kelsch P et al. 2015

CLARA BARTON NATIONAL HISTORIC SITE (M: 35-25)

Clara Barton National Historic Site (M: 35-25), otherwise known as the Clara Barton House, was Clara Barton's private residence from 1897 to 1912 and served as the executive headquarters of the Red Cross from 1897 to 1904. Clara Barton is most known for her career as a Civil War nurse and founder of the Red Cross. The foundation of the house was originally from a site of the Red Cross Hotel in Johnstown, Pennsylvania, constructed in 1889, and provided temporary housing for those displaced during the Johnstown floods (De Vries et al. 2023).

After the foundation no longer served its original purpose, it was shipped to Glen Echo and was used to support the three-story building currently on the site (**Figure 8**). While the building was intended to serve as the headquarters for the Red Cross, the area lacked the necessary infrastructure to make the undertaking feasible and instead the building was used for storage of supplies and as temporary housing for Red Cross staff. With the growth of Glen Echo in the 1890s, the project could move forward, and in 1897, under direct supervision of Clara Barton, the structure was remodeled to be used for the organization's headquarters (De Vries et al. 2023). In addition to the structure, the Clara Barton National Historic Site contains approximately 2,000 items from the 1890-1912 period, many of which belonged to Barton herself. The property was determined a National Historic Landmark in 1965 and listed in the National Register in 1966 for its association with Clara Barton and its role in the Red Cross' Social and Humanitarian history during the late nineteenth to early twentieth century under the auspices of Clara Barton (MHT Site Files; Goeldner 1979).

Figure 8. Clara Barton House

GLEN ECHO PARK HISTORIC DISTRICT (M: 35-41)

The Glen Echo Park Historic District (M: 35-41) is an example of an early twentieth century amusement park and is also reflective of the late nineteenth century Chautauqua Movement in Maryland (**Figure 9**, left). The park was purchased in 1911 by the Washington Railway and Electric Company and the Capital Transit Company. Success of the park was attributed to its first manager, Leonard B. Schloss, who was integral in the development of several of the mechanical rides. The park's height of popularity was between 1920-1940, but by the mid-

twentieth century it fell into decline due to the rise of regional theme parks, such as Disney World, which drew larger crowds. In 1968, the park was purchased by the NPS (Scott 1984).

Except for the Carousel (M: 35-39), the rides and amusements are no longer extant. At the time of its listing in the National Register in 1984, the extant buildings at Glen Echo Park included the Chautauqua Tower (M: 35-26), the Carousel (M: 35-39), the Bumper Car Pavilion, remnants of the Crystal Pool, the Spanish Ballroom, the arcade, maintenance shops, picnic grove, yurts, an ice house, horse barn, Hall of Mirrors, and an incinerator building. As an example of an early twentieth century amusement park, Glen Echo Park was listed in the National Register for its significance in Architecture, Commerce, Education, and Recreation (Scott and Brabham n.d.).

Figure 9. Interior Courtyard (left) and Spanish Ballroom (right) at Glen Echo Park

The Spanish Ballroom, a contributing resource to the Glen Echo Park Historic District, is a historic dance hall that has been a cherished venue for social events since its opening in 1933 (**Figure 9**, right). Designed by Edward Schoepp and known for its Spanish Colonial Revival architecture, the ballroom features elegant tile work, arched doorways, and a grand wooden dance floor. Over the years, it has hosted a variety of events, including swing dances, concerts, and cultural gatherings, and remains a popular spot for both locals and visitors. Today, the ballroom continues to serve as a vibrant hub for live music, dance, and community activities, preserving its rich history while providing a unique atmosphere for modern events.

THE CAROUSEL AT GLEN ECHO PARK (M: 35-39)

The Carousel at Glen Echo Park (M: 35-39) was built in 1921 by the Philadelphia firm of Gustav and William Dentzel and operated in Glen Echo Park from the 1920s to 1960s (**Figure 10**, left). The building features 18 bays with vaulted ceilings and flared domed roof (**Figure 10**, right). The ride itself comprises 52 animals arranged on three concentric rings. The Carousel is significant as the only carousel of its age and quality that remains in its original location and is considered the top sixth or seventh in quality compared to other surviving examples of similar age (Scott and Veloz 1980). The Carousel also contains a Wurlitzer Military Band Duplux Orchestral Organ, Style No. 165, and is contemporary to the carousel. When the park closed in the late 1960s, the Carousel was sold to a collector from Virginia; however, the residents of Glen Echo were able to raise enough money to buy back the ride. The NPS took ownership of the Carousel in 1971 when it took ownership of Glen Echo Park. The Carousel was individually listed in the National Register in 1980 for its significance in early twentieth century Art and Sculpture utilized in the design of amusement park architecture (Scott and Veloz 1980). The Carousel is also a contributing resource to the National Register-listed Glen Echo Park Historic District.

Figure 10. Carousel (left) and Carousel Building (right) at Glen Echo Park

CHAUTAUQUA TOWER (M: 35-26)

The Chautauqua Tower (M: 35-26) in Glen Echo Park is a Richardson Romanesque-style structure built between 1891-1892 and was one of three structures under construction during the closing decade of the nineteenth century (**Figure 11**). The other two buildings included an Amphitheater and the Hall of Philosophy. The Tower, which originally housed bells manufactured by the McShane Foundry in Baltimore and administrative offices, is the sole physical structure left from the 1890's Chautauqua Movement in Glen Echo. The Chautauqua Movement, which began in 1874 at Lake Chautauqua, New York, sought to democratize adult learning within the framework of the ecumenical Protestant religion by bringing upper class culture to the masses through lectures and learning programs. The endeavor caught the attention of Clara Barton, who would become the Woman's Executive Committee of the National Chautauqua of Glen Echo's president. Early on, the Chautauqua Movement was successful in its efforts at cultural exposure of the masses and in the summer of 1891, over 300 families were camped out on the property to attend the educational and recreational programs sponsored by the organization. However, the success was short-lived and the Movement in Glen Echo quickly declined after there were rumors of malaria cases in the area (Mackintosh 1980.)

Figure 11. Chautauqua Tower at Entrance to Glen Echo Park

The Chautauqua Movement later transitioned into a traveling format that lessened the need for permanent structures. In 1899, the National Chautauqua Company leased the Tower to Glen Echo Park to be used as an

amusement park. The Tower was purchased by the NPS in 1971, and renovations were completed in 1975 after a fire damaged the roof of the structure the year prior (Mackintosh 1980). The Chautauqua Tower was determined eligible for listing in the National Register in 1980 for its significance in Community Planning, Art, and Education as part of the 1890s Chautauqua Movement in Glen Echo (MHT Site Files). In addition to being individually eligible for listing, the Tower also contributes to the National Register-listed Glen Echo Park Historic District.

C&O CANAL NATIONAL HISTORICAL PARK (M: 12-46)

The C&O Canal National Historical Park (M: 12-46) comprises 20,239 of acres and includes the historic canal / canal prism, locks, lockhouses, aqueducts, culverts, dams, and weirs as well as other associated features (**Figure 12**, foreground). The 184-mile canal, which extended from Georgetown to Cumberland, Maryland, was built between 1828 and 1850 and was primarily used to haul coal. The canal was constructed by the C&O Canal Company, headed by the Chief Engineer Benjamin along with John Martineau, Nathan S. Roberts. Charles B. Fisk took over as chief engineer from 1835 to 1852. The Baltimore and Ohio Railroad Company became the majority owners of the canal after the C&O Canal Company was forced into a receivership in 1889. The canal remained in operation until 1924, at which time railroads took over as the primary transportation for trade and the canal was damaged by floods.

The NPS acquired the canal property in 1938, at which time some restoration work took place that included the rebuilding of the towpath and repairing the damaged locks, culverts, and lockhouses. The C&O Canal became a National Monument in 1961, and the canal was listed in the National Register in 1966 for its significance in Architecture, Military History, Transportation, Commerce, Engineering, and Conservation. Additional land was acquired in 1971 by the order of Congress to expand and establish the C&O Canal National Historical Park. The nomination was revised in 1980 (NPS 2025; Romigh and Mackintosh 1979; MHT Site Files; NPS 2021).

Figure 12. C&O Canal Lock #7 (foreground) and Lock Keeper's House (background)

C&O CANAL LOCK #7 AND LOCK KEEPER'S HOUSE (M: 35-27)

C&O Canal Lock #7 and the Lock Keeper's House (M: 35-27) were constructed between 1828 and 1850. The lock, constructed as part of the original canal, is one of 74 lift locks along the C&O Canal and comprises an upper mitre gate on the breast wall that allows the lock to be shorter (**Figure 12**, foreground). The original design

incorporated culverts in the wall rather than bypass flumes that helped maintain the flow of the water below the lock. To accommodate larger barge traffic, the lock was lengthened by 10 feet in 1876 to 1877 (C&O Canal Association 2003).

James O'Brien constructed the Lock Keeper's House (House No. 5) in 1829 and was the first lock house completed along the canal. The building is a one-and-a-half-story, three-bay stone house that features a single dormer, set flush with the wall and breaking into the eaves, a shed-roofed porch, entrance hall, and centrally positioned chimney (**Figures 12**, background). The NPS repaired the house between 1938 and 1940 (Unrau 1978:iv, vii, and 4). While Lock #7 and the Lock Keeper's House have not been individually evaluated for listing in the National Register, the two resources are considered contributing to the National Register-listed C&O Canal National Historical Park.

ASSESSMENT OF ADVERSE EFFECTS

The NPS applied the *Criteria of adverse effect*, as defined in 36 CFR 800.5(a)(1), to assess the potential effects of the undertaking on historic properties within the APE. An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify it 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. Adverse effects may include reasonably foreseeable effects that may occur later in time, be farther removed in distance, or be cumulative. Examples of adverse effects on historic properties as noted in 36 CFR 800.5 include, but are not limited to:

1. the physical destruction of or damage to all or part of the property;
2. the alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, and provision of handicapped access, that is not consistent with the Secretary of the Interior's *Standards for the Treatment of Historic Properties*;
3. the removal of the property from its historic location;
4. the change in character of the property's use or of physical features within the property's setting that contribute to its historic significance;
5. the introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
6. the neglect of a property which causes its deterioration; and
7. the transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of that property's historic significance.

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 undertaking.

GEORGE WASHINGTON MEMORIAL PARKWAY / CLARA BARTON PARKWAY (M: 35-61)

The cantilever structure is an integral part of Clara Barton Parkway and is an innovative design that allowed Parkway construction within the restrictive terrain between the C&O Canal and Glen Echo. The cantilever structure extends approximately 1,409 feet between the retaining walls at its northwest and southeast ends. The NPS proposes to construct the replacement structure with poured concrete similar to the existing structure, and the retaining walls with shotcrete, resulting in a narrower cantilever structure, thus altering the original

structure design. The NPS will also install new railings to the newly constructed cantilever structure that meet safety hardware standards; however, the railings will look similar to those on the existing structure.

The NPS proposes to retain the existing retaining wall of the cantilever structure, rehabilitated in 1993, concealed behind the newly constructed wall, obscuring the existing wall from view. The NPS will replace the retaining wall extending from the northwest and southeast ends of the cantilever structure in a similar manner (**Figures 13** and **14**). As part of the construction, the NPS will excavate the hillslope to the north of the cantilever structure to accommodate realigned travel lanes, ditch, and rockfall area. The excavation will expose bedrock and will result in the removal of trees and other vegetation altering the view of this portion of Clara Barton Parkway for those traveling westbound.

Additionally, the Glen Echo Overpass spans the westbound lanes of Clara Barton Parkway where the Parkway splits to accommodate the MacArthur Boulevard exit (**Figure 15**). Demolition of the overpass will remove a resource from the landscape that contributes to the significance of Clara Barton Parkway.

Finding of Effect

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 will 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 will obscure views of the current walls, realignment of the roadway, hillside excavation that will remove trees and exposure bedrock, and demolition of the Glen Echo Overpass, will result in an adverse effect on Clara Barton Parkway. Rather than removing the cantilever structure completely, the NPS chose an alternative with a narrower overhang as a modification to minimize the adverse effect.

The NPS is proposing preparation of Phase II Historic American Engineering Record (HAER) documentation for both the cantilever structure and Glen Echo Overpass to resolve the adverse effect on Clara Barton Parkway. The NPS intends to pursue the execution of a Memorandum of Agreement (MOA) with MHT in accordance with 36 CFR 800.6(c) that will outline the final avoidance, minimization, and mitigation measures agreed upon by both agencies to resolve the adverse effect.

Figure 13. View from Clara Barton Parkway looking northwest along the Cantilever Structure

Figure 14. View from Clara Barton Parkway looking southeast along the Cantilever Structure towards the Glen Echo Overpass

Figure 15. View from Clara Barton Parkway looking northwest towards the Glen Echo Overpass

CLARA BARTON NATIONAL HISTORIC SITE (M: 35-25)

Clara Barton National Historic Site (M: 35-25) sits on a rise overlooking Clara Barton Parkway. The property is accessed by a gravel circular drive at the end of Oxford Road. Surrounding the house is a lawn dotted with large trees with an approximately 117-foot tree line located along Clara Barton Parkway. To the northeast, east, and southeast of the Clara Barton National Historic Site is a large, paved parking lot which services Glen Echo Park. The northwestern end of the cantilever structure is located approximately 261 feet to the south of the house. The existing retaining wall proposed for replacement on Clara Barton Parkway continues for 1,824 feet from the northwest end of the cantilever structure and extends past the Clara Barton National Historic Site. This retaining wall is not visible from the house. As such, any differences between the old and new retaining walls and installation of the new safety railings are unlikely to be noticeable.

Deciduous trees and understory vegetation shield views of Clara Barton Parkway from the Clara Barton National Historic Site in the spring to fall. In the winter, Clara Barton Parkway is partially visible with leaves off (**Figures 16-18**). The NPS will 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 will remain. Most of the property is set back from Clara Barton Parkway, and views are partially blocked from the Clara Barton National Historic Site during much of the year by the steep downward slope and vegetation.

The Glen Echo Overpass is approximately 1,850 feet from Clara Barton National Historic Site's closest point and therefore, due to distance, tree cover, and the slope in the landscape, the Clara Barton National Historic Site does not view the overpass (**Figure 19**).

Finding of Effect

Based on this assessment, the NPS finds the undertaking will have no adverse effect on the Clara Barton National Historic Site.

Figure 16. View from southwest edge of Clara Barton National Historic Site looking southwest towards the Cantilever Structure

Figure 17. View from Rear of Clara Barton House looking northwest towards the Cantilever Structure

Figure 18.View from rear of Clara Barton House looking southwest towards the Cantilever Structure

Figure 19. View from south Corner of Clara Barton National Historic Site looking southwest towards the Glen Echo Overpass

GLEN ECHO PARK HISTORIC DISTRICT (M: 35-41)

The Glen Echo Park Historic District (M: 35-41) comprises approximately nine acres and sits on a rise in the landscape. The property contains nine contributing and seven non-contributing resources. Two of the resources within the historic district are individually listed or eligible for listing in the National Register, the Carousel (M: 35-39) and the Chautauqua Tower (M: 35-26), respectively. The landscape of the site includes areas of lawn dotted with trees and paved pathways throughout. A deciduous tree line is located along Clara Barton Parkway, and in the spring through fall, shields the view of the Parkway from the Historic District. In the winter, Clara Barton Parkway is partially visible (**Figures 20-22**). Most of the property is set back from Clara Barton Parkway and with the steep downward slope, will not view the proposed cantilever structure and retaining wall replacement. The Spanish Ballroom, however, partially views the westbound lanes of Clara Barton Parkway during leaf-off (**Figures 20** and **21**). With NPS removing trees on the slope as part of the construction of the new cantilever structure, there will be clearer views from the ballroom to Clara Barton Parkway during most of the year. The remaining resources on the property will not view the cantilever structure replacement.

Additionally, because the ballroom is close to the edge of the downward slope, there is concern that the building will be directly affected by excavation of the hillside, particularly from vibration caused by the installation of rock bolts intended to stabilize the slope. Vibration spikes from rock bolt installation may cause plaster and/or the stucco to crack thus damaging the building's historic fabric. However, NPS would implement a thorough vibration mitigation strategy that may include, but is not limited to, pre-construction geotechnical surveys, pre- and post-construction structural surveys, vibration monitoring and structural protections (if needed) during construction, and identifying alternative means and methods for stabilizing the hillslope to prevent damage to the Spanish Ballroom.

The Glen Echo Overpass is approximately 600 feet from the Glen Echo Park Historic District and therefore, due to distance, tree cover, and the slope in the landscape, the Historic District does not view the overpass (**Figure 23**).

Finding of Effect

Based on this assessment, the NPS finds the undertaking will have no adverse effect on the Glen Echo Park Historic District with the condition that a vibration mitigation strategy is implemented to protect the Spanish Ballroom. The NPS and MHT will prepare an MOA that will outline the details of the final avoidance, minimization, and mitigation measures agreed upon by both agencies to ensure no adverse effect on the Glen Echo Park Historic District, including the Spanish Ballroom.

Figure 20. View from Glen Echo Park looking southeast towards the Cantilever Structure

Figure 21. View from Glen Echo Park looking west from the Spanish Ballroom towards the Cantilever Structure

Figure 22. View from Glen Echo Park looking southwest from the Spanish Ballroom towards the Cantilever Structure

Figure 23. View from Glen Echo Park looking east / southeast towards the Glen Echo Overpass

THE CAROUSEL AT GLEN ECHO PARK (M: 35-39)

The Carousel at Glen Echo Park (M: 35-39) is located on a rise in the landscape on the northeast side of Clara Barton Parkway. At its closest point, Clara Barton Parkway is approximately 275 feet downslope from the Carousel. Surrounding the Carousel are paved paths with a building directly to the west, and a lawn area dotted with trees to the south. Between the Carousel and the cantilever structure to the southwest is approximately 200 feet of forest, mainly comprised of deciduous trees. The amphitheater and additional areas of forest are to the west of the Carousel and to the south and southwest, the view is blocked by the Spanish Ballroom and the Bumper Car Pavillion. The Carousel is on a rise and set back from the slope and does not view the cantilever structure (**Figure 24**).

The Carousel is approximately 1,350 feet northwest of the Glen Echo Overpass. The view of the overpass is blocked by several buildings, as well as approximately 680 feet of downward sloping forest (**Figure 25**).

Finding of Effect

Based on this assessment, the NPS finds the undertaking will have no adverse effect on the Carousel.

CHAUTAUQUA TOWER (M: 35-26)

The Chautauqua Tower (M: 35-26) is located to the southwest of MacArthur Boulevard and to the northeast of the Carousel and Clara Barton Parkway. A two-story building with one-story wing abuts the Tower to the northwest, and the Art Deco entry to Glen Echo Park is immediately to the southeast. To the southwest of the Tower are paved walking paths and several trees. Like the Carousel, the Tower sits back from the edge of slope. The view from the Tower is blocked by the artists' pods, the amphitheater, Carousel, and forest to the southwest. To the south the view is obscured by the Spanish Ballroom and to the southeast by other park buildings. As the Tower is on a rise and set back from the slope, and other buildings on the property are located between the structure and Clara Barton Parkway, the Tower does not view the cantilever structure (**Figures 26** and **27**).

The Tower is approximately 1,425 feet northwest of the Glen Echo Overpass. The view of the structure is blocked by several buildings, as well as approximately 650 feet of downward sloping forest (**Figure 28**).

Finding of Effect

Based on this assessment, the NPS finds the undertaking will have no adverse effect on Chautauqua Tower.

Figure 24. View from the Carousel looking southwest toward the Cantilever Structure

Figure 25. View from the Carousel looking southeast toward the Glen Echo Overpass

Figure 26. View from Chautauqua Tower looking southwest toward the Cantilever Structure

Figure 27. View from Chautauqua Tower looking west toward the Cantilever Structure

Figure 28. View from Glen Echo Park Entrance Building Adjacent to the Chautauqua Tower looking west toward the Glen Echo Overpass

C&O CANAL NATIONAL HISTORICAL PARK (M: 12-46)

The C&O Canal National Historical Park (M: 12-46) comprises, in total, approximately 19,236 acres, and 122 of those acres are within the APE on the southwest side of and runs parallel to Clara Barton Parkway. Most of C&O Canal National Historical Park is wooded within the APE except for the open area where Lock #7 and the Lock Keeper's House (M: 35-27) are located (**Figures 29** and **30**). The cantilever structure is visible across Clara Barton Parkway from the northeastern edge of the C&O Canal National Historical Park, then becomes obscured farther into the park due to tree cover and the slope of the landscape towards the river. Additionally, C&O Canal National Historical Park is southwest of the Glen Echo Overpass and sits within a low point in the landscape with the overpass at a higher elevation. Forested areas on both sides of Clara Barton Parkway block the view of the overpass from C&O Canal National Historical Park (**Figure 31**).

Finding of Effect

Based on this assessment, the NPS finds the undertaking will have no adverse effect on C&O Canal National Historical Park.

Figure 29. View from C&O Canal National Historical Park looking northeast toward the Cantilever Structure

Figure 30. View from C&O Canal National Historical Park looking northeast toward the Cantilever Structure

Figure 31. View from C&O Canal National Historical Park looking east toward the Glen Echo Overpass

C&O CANAL LOCK #7 AND LOCK KEEPER'S HOUSE (M: 35-27)

The C&O Canal Lock #7 and the Lock Keeper's House (M: 35-27) are located on the southwest side of Clara Barton Parkway and in view of the cantilever structure. A narrow, dirt path off a small, paved parking lot directly off Clara Barton Parkway leads to both the Keeper's House and Lock #7. Both the Lock and Keeper's House are immediately surrounded by a lawn dotted with large trees. The Lock is approximately 140 feet to the southwest of Clara Barton Parkway at its closest point, and the Keeper's House, approximately 60 feet (**Figure 32** and **Figure 33**).

C&O Canal Lock #7 and the Lock Keeper's House are northwest of the Glen Echo Overpass, and at the closest point, the overpass is approximately 1,000 feet from the house, and approximately 1,040 feet from the lock. The house and lock sit within a low point in the landscape with the overpass at a higher elevation. Forested areas on both sides of Clara Barton Parkway block views of the overpass (**Figures 34** and **35**).

Finding of Effect

Based on this assessment, the NPS finds the undertaking will have no adverse effect on C&O Canal Lock #7 and the Lock Keeper's House.

Figure 32. Lock Keeper's House with Cantilever Structure in Background, View looking northeast

Figure 33. View from Lock #7 looking northwest toward the Cantilever Structure

Figure 34. View from Lock Keeper's House looking southeast toward Glen Echo Overpass

Figure 35. View from Lock #7 looking southeast toward the Glen Echo Overpass

SUMMARY OF EFFECTS

Potential adverse effects on seven historic properties are analyzed within this Assessment of Effects Report. Based on the analysis, NPS makes the following findings based on the *Results of assessment,* per 36 CFR 800.5(d), related to the cantilever structure, retaining wall replacement, and overpass demolition:

- There will be an **adverse effect** on Clara Barton Parkway (M: 35-61).
- There will be **no adverse effect** on Clara Barton National Historic Site (M: 35-25); Glen Echo Park Historic District (M: 35-41), including the Carousel (M: 35-39) and Chautauqua Tower (M: 35-26); C&O National Historical Park (M: 12-46); and Lock #7 and Lock Keeper's House (M: 35-27). There will also be **no adverse effects** anticipated on the Spanish Ballroom at Glen Echo Park based on implementation of a mitigation strategy to prevent construction excavations and vibration from damaging the structure.

AVOIDANCE, MINIMIZATION, AND MITIGATION TO RESOLVE ADVERSE EFFECTS

The NPS intends to pursue the execution of a MOA with MHT in accordance with 36 CFR 800.6(c) due to the finding of adverse effects on Clara Barton Parkway caused by the undertaking. The MOA will outline the avoidance, minimization, and mitigation measures agreed upon by both agencies to resolve the adverse effects, which are anticipated to include, but are not limited, the following:

- Preparation of Phase II HAER documentation for both the cantilever structure and Glen Echo Overpass.
- Implementation of a thorough vibration mitigation strategy that may include, but is not limited to, pre-construction geotechnical surveys, pre- and post-construction structural surveys, vibration monitoring and structural protections (if needed) during construction, and identifying alternative means and methods to prevent damage to the Spanish Ballroom.

Appendix B details various alternatives that were considered but ultimately dismissed in the agency's efforts to avoid, minimize, or mitigate adverse effects. These alternatives included modifications to project design and construction methods but were found insufficient in addressing the identified impacts. This documentation not only ensures transparency in the decision-making process but also highlights the agency's commitment to responsible stewardship of historic resources while balancing transportation needs.

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Veloz, Nicholas and Scott, Gary. *National Register of Historic Places Inventory-Nomination Form: Carousel at Glen Echo Park, Glen Echo, Maryland.* Washington, DC: NPS, 1980.

Clara Barton Parkway Cantilever and Glen Echo Overpass

Assessment of Effects

Appendix A. Section 106 Consultation Correspondence

DISCLAIMER

Section 508 Compliance and Appendices

At present, the accessibility of appendix 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

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

Sincerely,

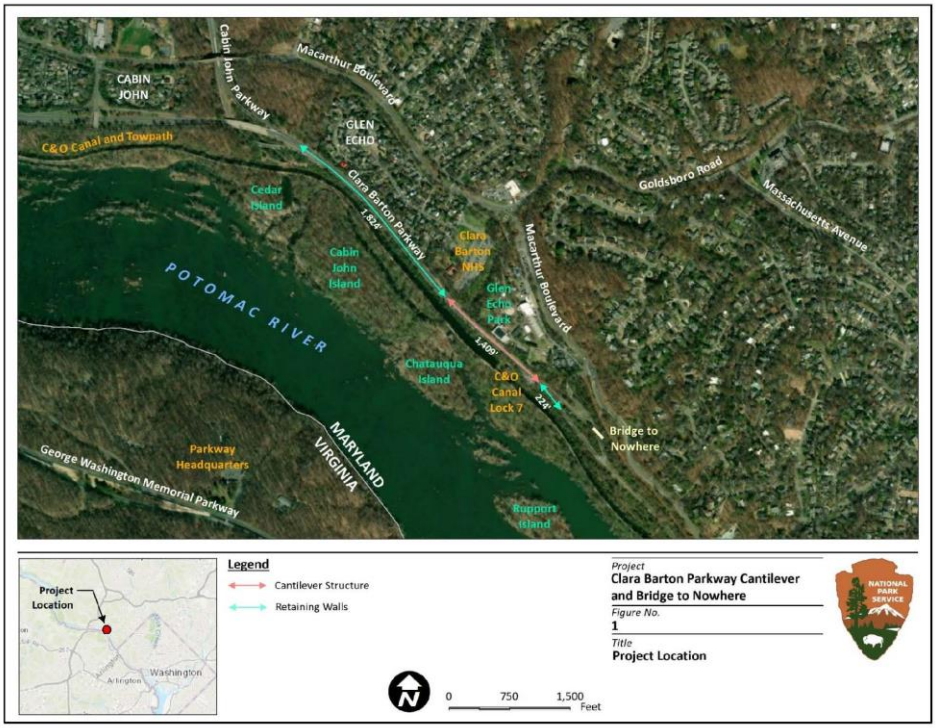
Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway

Photo: Cantilever structure from southbound Clara Barton Parkway

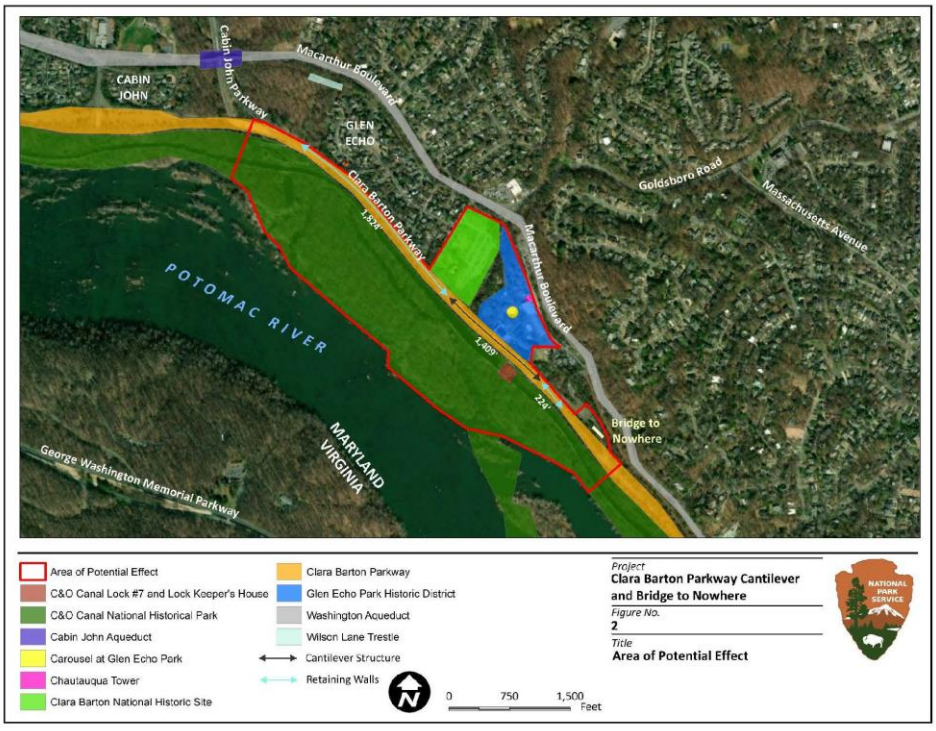
Photo: Cantilever structure from northbound Clara Barton Parkway

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

Photo: Bridge to nowhere from bridge deck


CABIN JOHN
Cabin John Parkway
Macarthur Boulevard
GLEN ECHO
C&O Canal and Towpath
Cedar Island
Clara Barton Parkway
1,824'
Cabin John Island
Clara Barton NHS
Glen Echo Park
Macarthur Boulevard
Goldsboro Road
Massachusetts Avenue
POTOMAC RIVER
1,409'
Chatauqua Island
C&O Canal Lock 7
224'
Bridge to Nowhere
Parkway Headquarters
George Washington Memorial Parkway
MARYLAND
VIRGINIA
Ruppert Island
Project Location
Washington
Arlington
Legend
Cantilever Structure
Retaining Walls
0 750 1,500 Feet
Project
Clara Barton Parkway Cantilever and Bridge to Nowhere
Figure No.
1
Title
Project Location
NATIONAL PARK SERVICE

8


CABIN JOHN
Cabin John Parkway
Macarthur Boulevard
GLEN ECHO
Clara Barton Parkway
1,824'
Goldsboro Road
Massachusetts Avenue
Macarthur Boulevard
POTOMAC RIVER
1,409'
224'
Bridge to Nowhere
George Washington Memorial Parkway
MARYLAND
VIRGINIA
Area of Potential Effect
C&O Canal Lock #7 and Lock Keeper's House
C&O Canal National Historical Park
Cabin John Aqueduct
Carousel at Glen Echo Park
Chautauqua Tower
Clara Barton National Historic Site
Clara Barton Parkway
Glen Echo Park Historic District
Washington Aqueduct
Wilson Lane Trestle
Cantilever Structure
Retaining Walls
0 750 1,500 Feet
Project
Clara Barton Parkway Cantilever and Bridge to Nowhere
Figure No.
2
Title
Area of Potential Effect
NATIONAL PARK SERVICE

9

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

Date: January 14, 2025

To: Megan Bailey
National Park Service

Project Name: Clara Barton Parkway Cantilever Rehabiliation/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

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.

1

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

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.

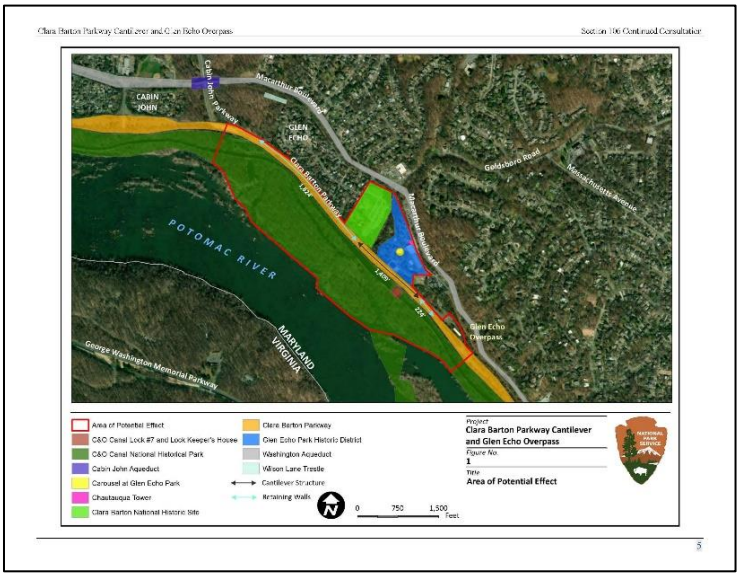
Sincerely,

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


Clara Barton Parkway Cantilever and Glen Echo Overpass
Section 106 Continued Consultation
CABIN JOHN
GLEN ECHO
C&O Canal and Towpath
Cedar Island
Clara Barton Parkway
Cabin John Island
Glen Echo Park
Chautauqua Island
C&O Canal Lock 7
Glen Echo Overpass
Parkway Headquarters
Bagpipers Island
POTOMAC RIVER
MARYLAND
VIRGINIA
George Washington Memorial Parkway
Goldsboro Road
Massachusetts Avenue
MacArthur Boulevard
Project Location
Legend
Cantilever Structure
Retaining Walls
Project
Clara Barton Parkway Cantilever and Glen Echo Overpass
Figure No.
1
Title
Project Location
0 750 1,500 Feet
4


Clara Barton Parkway Cantilever and Glen Echo Overpass
Section 106 Continued Consultation
CABIN JOHN
GLEN ECHO
Clara Barton Parkway
POTOMAC RIVER
MARYLAND
VIRGINIA
George Washington Memorial Parkway
Goldsboro Road
Massachusetts Avenue
MacArthur Boulevard
Glen Echo Overpass
Area of Potential Effect
C&O Canal Lock #7 and Lock Keeper's House
C&O Canal National Historical Park
Cabin John Aqueduct
Carousel at Glen Echo Park
Chautauqua Tower
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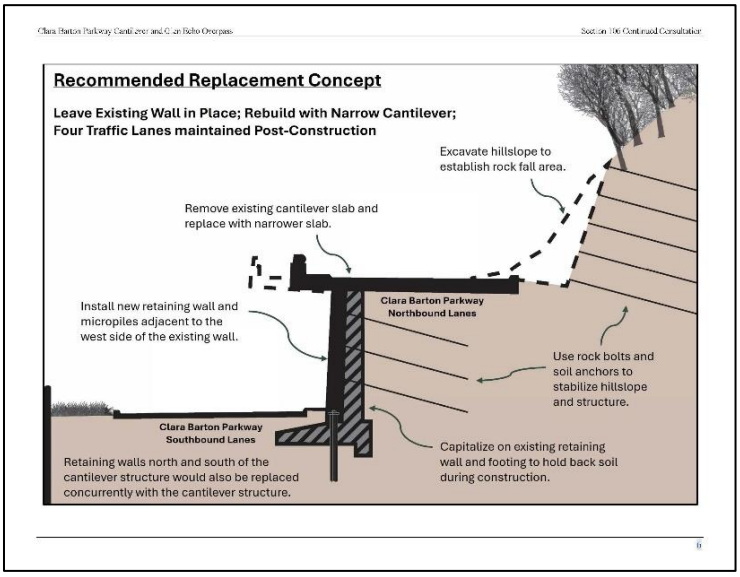
Clara Barton Parkway
Glen Echo Park Historic District
Washington Aqueduct
Wilson Lane Trestle
Cantilever Structure
Retaining Walls
Project
Clara Barton Parkway Cantilever and Glen Echo Overpass
Figure No.
1
Title
Area of Potential Effect
0 750 1,500 Feet
5


Clara Barton Parkway Cantilever and Glen Echo Overpass
Section 106 Continued Consultation
Recommended Replacement Concept
Leave Existing Wall in Place; Rebuild with Narrow Cantilever;
Four Traffic Lanes maintained Post-Construction
Excavate hillslope to establish rock fall area.
Remove existing cantilever slab and replace with narrower slab.
Install new retaining wall and micropiles adjacent to the west side of the existing wall.
Clara Barton Parkway Northbound Lanes
Use rock bolts and soil anchors to stabilize hillslope and structure.
Clara Barton Parkway Southbound Lanes
Capitalize on existing retaining wall and footing to hold back soil during construction.
Retaining walls north and south of the cantilever structure would also be replaced concurrently with the cantilever structure.
6

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)

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

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.

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National Capital Planning Commission
NPS, C&O Canal NHP
C&O Canal Trust
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Heritage Montgomery
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Montgomery Preservation
Preservation Maryland
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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

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

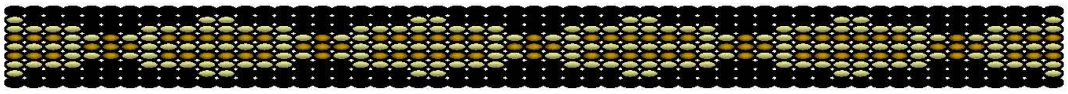
Sincerely,

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,

Caitlin Rogers for

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

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.**"**

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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.

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

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

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

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Chickahominy Indian Eastern Division
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consultations@cit-ed.org

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

Sincerely,

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway

Outlook

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

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

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

Thank you for contacting us regarding the proposed project.

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

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

However, the Tribe requests to be contacted if:

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

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

Blessings,

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

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

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

Dear Ms. Dickerson:

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

Acting Superintendent
George Washington Memorial Parkway

United States Department of the Interior
NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

December 18, 2024

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

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

Dear Ms. Lucas:

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

DESCRIPTION OF THE UNDERTAKING

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

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Franklin, Katherine, and Sarah Gregory

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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 con**ducted 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

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

Sincerely,

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway

United States Department of the Interior
NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

December 18, 2024

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

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

Dear Ms. Nuckolls:

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 Eastern Shawnee of Oklahoma 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.

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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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CONSULTING PARTIES

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Montgomery Preservation
Preservation Maryland
Glen Echo Park Partnership for Arts and Culture
Catawba Nation
Chickahominy Indian Tribe
Chickahominy Indians Eastern Division
Delaware Nation
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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

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

Sincerely,

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).

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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

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United States Department of the Interior
NATIONAL PARK SERVICE
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

December 18, 2024

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

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

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

Dear Chief Anderson:

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 Nansemond 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.**"**

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The Glen Echo overpass, or **"**bridge to n**owhere"**, 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."**

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Chief Robert Gray
Pamunkey Indian Tribe
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robert.gray@pamunkey.org

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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

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

CC: Marion Werkheiser, marion@culturalheritagepartners.com

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

Dear **Chief Anne Richardson** :

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

DESCRIPTION OF THE UNDERTAKING

Cantilever and Retaining Walls

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 n**owhere"**, 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

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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
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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
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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

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

Sincerely,

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway

United States Department of the Interior
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December 18, 2024

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

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Montgomery County, Maryland

Dear Mr. Tarrant:

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Sincerely,

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

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Franklin, Katherine, and Sarah Gregory

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

SECTION 106 CONSULTATION AND NEPA COORDINATION

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

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

CONSULTING PARTIES

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

Maryland Historical Trust
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

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

Sincerely,

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 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

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).

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.

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Chickahominy Indians Eastern Division
Delaware Nation
Eastern Shawnee of Oklahoma
Monacan Indian Nation
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Pamunkey Indian Tribe
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Megan Bailey, Cultural Resources Program Manager for the George Washington Memorial Parkway, at megan_bailey@nps.gov.

Sincerely,

Christine Smith, Superintendent (Acting)
George Washington Memorial Parkway

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Clara Barton Parkway Cantilever and Glen Echo Overpass

Assessment of Effects

Appendix B. Additional Alternatives Considered

DISCLAIMER

Section 508 Compliance and Appendices

At present, the accessibility of appendix 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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ADDITIONAL ALTERNATIVES CONSIDERED

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 undertaking, or the dismissed replacement alternative described below. This section provides brief descriptions of the 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 is also discussed.

No Action Alternative

Under the no action alternative, the Clara Barton Parkway cantilever structure and associated retaining walls would continue to deteriorate. The FHWA would continue to regularly inspect the cantilever structure and emergency actions would be performed, as needed, to ensure the safety of the travelling public on Clara Barton Parkway. If no action is taken, the NPS would implement weight restrictions, prohibiting heavy vehicles to use the cantilevered westbound lane of Clara Barton Parkway due to its reduced load-bearing capacity. Weight restrictions would require ongoing community outreach, enforcement, and signage. Deterioration will progress to full closure of the cantilevered westbound lane and the eastbound lane below due to the risk of falling concrete debris if no action is taken to rehabilitate or replace the cantilever structure. Regular FHWA inspections will determine the timeline and level of intervention required; however, weight restrictions are expected to be necessary as early as 2026.

While the no action alternative would avoid adverse effects on Clara Barton Parkway in the short-term, adverse effects may occur over the long-term should routine maintenance measures fail to stop deterioration that may diminish the integrity of design, materials, and workmanship of the cantilever structure, retaining walls, and Glen Echo Overpass. As such, the NPS does not recommend no action and has not evaluated the alternative in further detail in this Assessment of Effects Report.

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 undertaking, making it least desirable from a financial perspective.

Like no action, rehabilitation of the cantilever structure would avoid adverse effects to Clara Barton Parkway in the short-term. However, a full replacement would cause an adverse effect after the 25-year usable lifespan of the rehabilitated structure ends. As such, the NPS does not recommend rehabilitation of the cantilever structure and has not evaluated the alternative in further detail in this Assessment of Effects Report.

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 B-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 B-1**, bottom left). The NPS would then construct a new retaining wall and footing (**Figure B-1**, top right), remove the top of the soldier pile wall, and install a new cantilever slab (**Figure B-1**, bottom right).

While the in-kind replacement alternative would have a lower total area of disturbance and less hillside impacts compared to the proposed undertaking, 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 undertaking. 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 undertaking would allow for two travel lanes to remain open to traffic for most of construction.

While in-kind replacement of the cantilever structure would minimize adverse effects, the NPS does not recommend the alternative due to the increased construction cost, duration, and traffic impacts as compared to the proposed undertaking. Therefore, NPS has not evaluated in-kind replacement of the cantilever structure in further detail in this Assessment of Effects Report.

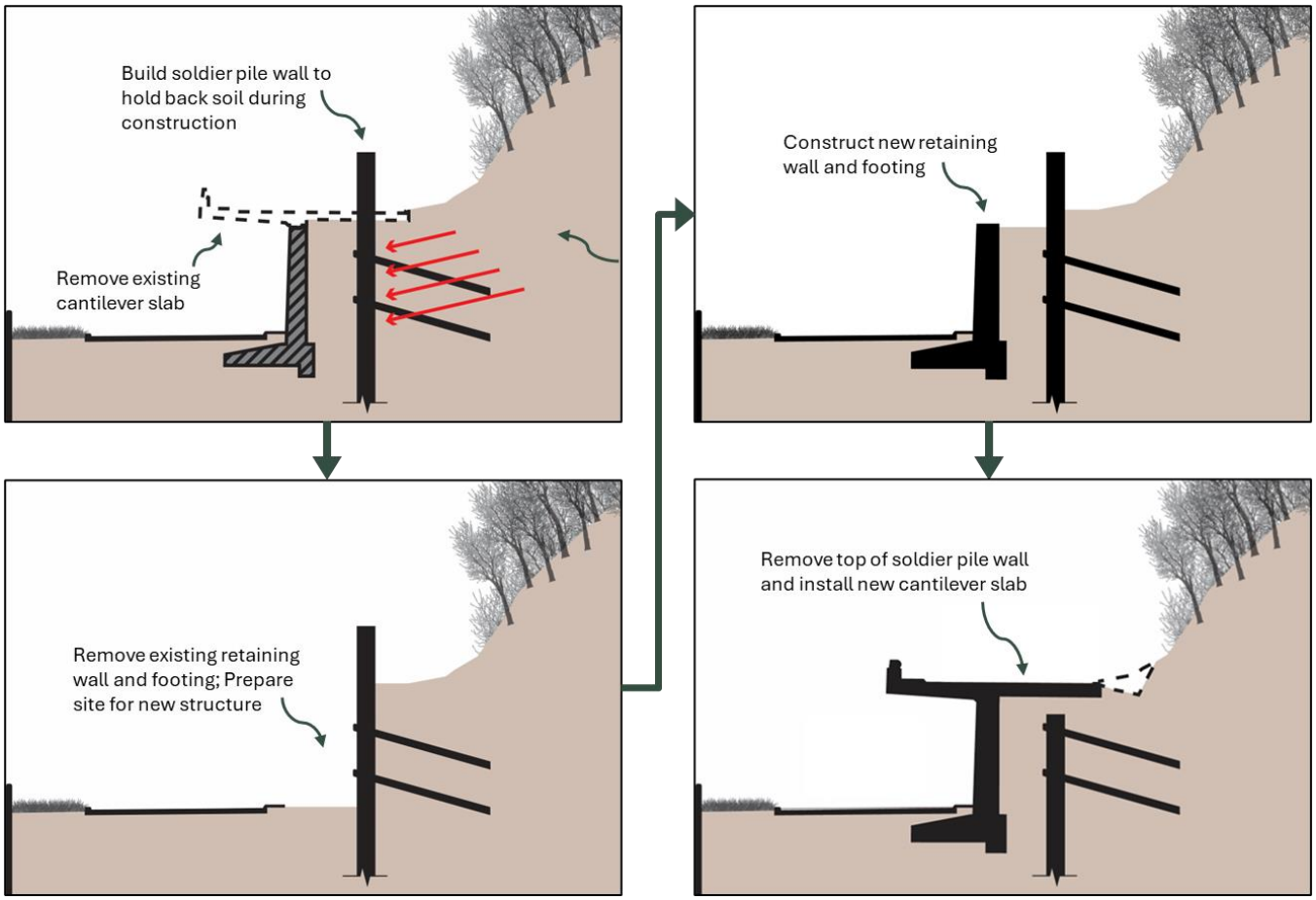

Figure B-1. Conceptual Schematic of the Dismissed In-Kind Cantilever Replacement Alternative

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 paint 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 Americans with Disabilities Act (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's 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.

Rehabilitating the Glen Echo Overpass would minimize adverse effects on Clara Barton Parkway; however, considering the constraints discussed above, the NPS does not recommend rehabilitating the overpass and has not evaluated the alternative in further detail in this Assessment of Effects Report.

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), accessed May 7, 2025.