



Maryland Department of Planning
Maryland Historical Trust

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Matthew J. Power
Deputy Secretary

February 2, 2011

Mr. Joseph Kroboth, III
Director of Public Works
Washington County Division of Public Works
100 West Washington Street, Room 238
Hagerstown, Maryland 21740-4735

Re: South County Public Safety Communications Facility
19005 Miller Avenue, Knoxville, MD
Washington County, Maryland
Section 106 Review – FCC

Dear Mr. Kroboth:

Thank you for your recent letter, dated December 13, 2010 and received by the Maryland Historical Trust (Trust) on December 16, 2010, requesting our review of the above-referenced project.

The Trust, Maryland's State Historic Preservation Office (SHPO), reviewed the submitted information to assess the project's effects on historic properties, in accordance with Section 106 of the National Historic Preservation Act and the Federal Communications Commission's (FCC) 2004 Nationwide Programmatic Agreement (NPA) covering the construction of communication towers. Trust staff carefully examined the Form 620 and accompanying attachments provided with your letter. We offer the following comments focused on historic properties located in Maryland. We defer to the West Virginia and Virginia SHPO offices to address historic preservation issues for properties located in their respective jurisdictions.

Project Description: The proposed undertaking entails construction of a 190 ft. self-supporting lattice public safety communications tower. The tower would be located within a 0.3 acre fenced compound, with two equipment sheds, on a one acre parcel at 19005 Miller Avenue. The current project area represents an alternative location to the former Tryst Road site the County originally considered in 2007 for this public safety tower. The present site is the County's preferred option out of three alternatives examined for the tower. We appreciate the County's efforts to develop alternatives, consult with the various interested parties, including the National Park Service (NPS), stakeholders, and the public, and consider options that balance project need and multiple concerns in the selection of a viable alternative for this tower.

Historic Properties: For archeology, the project area includes a previously identified archeological site, recorded in the Trust's Maryland Inventory of Historic Properties as 18WA409, Himes Property/Easton Domestic Site. The site was originally identified as part of a NPS survey of Maryland Heights (Frye and Frye 1989). It consists of the remains of a dwelling site that was occupied from the late 19th c. until the 1920s when the associated cabin was relocated off site. Visible remains of the dwelling's stone foundation and stone boundary walls survive. The County conducted archeological investigations during project planning for the current alternative, documented in Appendix A of the Form 620. The study included excavation of systematic shovel test pits and metal detector survey within the proposed tower compound as well as visual inspection and mapping of exposed remains within the parcel itself. The metal detector survey revealed a very light scatter of metal objects, primarily spent munitions likely associated with Civil War era activities in this vicinity.

The survey did not uncover any further artifacts or cultural deposits associated with the domestic site and the National Register eligibility of 18WA409 remains undetermined. Based on the survey results, it does not appear that construction of the proposed tower will impact significant archeological remains. However, the County should implement measures to protect the exposed foundation and fence remains from inadvertent disturbance as a result of project related construction equipment and activities.

Regarding historic resources, the Maryland Heights section of the Harpers Ferry National Historical Park (WA-III-072), which is listed in the National Register of Historic Places, is located immediately adjacent to the proposed tower site. Maryland Heights comprises the Elk Ridge promontory on the north side of the Potomac River. It is significant for its association with the early settlement and industry in the region and includes 19th c. domestic sites and an extensive complex of charcoal making operations associated with the Antietam Ironworks from 1810-1843. In addition, it contains substantial fortifications, breastworks, a gun battery, and campgrounds and is significant for its association with Civil War history. Additional National Park Service historic, scenic and recreational facilities are located near the project area. The C&O Canal National Historical Park (WA-VI-048), also listed in the National Register of Historic Places, is situated along the north side of the Potomac River, approximately ¼ mile south of the tower site. The Appalachian National Scenic Trail traverses the ridgeline of South Mountain, circa two miles east of the tower, where it joins the C&O Canal towpath until it crosses the Potomac River in Harpers Ferry. Beyond their designations as historic properties, these parks represent extremely important scenic, natural, and recreational areas.

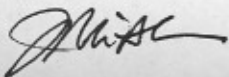
Assessment of Effects: The Form 620 and attached Visual Impact Assessment present an examination of the tower's visual effects within, as well as beyond, the defined ½ mile area of potential effects. For the historic properties in Maryland, the Form 620 asserts that the tower will not be visible from most portions of Maryland Heights and the C&O Canal given vegetation and topography. Direct line of sight to the tower is obscured by the intervening terrain and vegetation from most areas of the parks. From certain points within Maryland Heights, limited visibility through tree limbs is likely particularly during winter leaf-off conditions. We acknowledge that the tower will be visible from portions of the historic properties and more visible during certain times of the year. Nonetheless, it is our opinion that the presence of the proposed public safety tower will not *diminish* the characteristics that make the properties eligible for listing in the National Register of Historic Places. Based on the documentation provided, the Trust concurs with the County that construction of the proposed tower at this alternative will have no adverse effect on historic properties within Maryland.

The Trust acknowledges the County's serious need for a public safety tower in this locale and appreciates the efforts the County has taken to balance multiple and conflicting concerns raised by the consulting parties, stakeholders and the public. Pursuant to the FCC's procedures, the County has determined that the project will have no adverse effect on historic properties and the Trust agrees with this determination from a historic preservation perspective. Nevertheless, the tower site is located within a very unique, scenic, and exceptional geographic area – situated on the slopes of the Elk Ridge overlooking Pleasant Valley. Near the confluence of the Shenandoah and Potomac Rivers, the area is well renowned for its scenic beauty, rich cultural history, and diverse outdoor recreational opportunities. The National Park Service has raised legitimate concerns regarding the aesthetic intrusion the tower would create for the three national parks located in this area. The other consulting parties and the public have also raised similar concerns regarding the tower appearance and visibility. We urge the County to continue to consult with NPS, and other interested parties, to address their issues through design and appearance modifications so that a mutually agreeable solution may be achieved for this project.

Joseph Kroboth
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February 2, 2011
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If you have questions or require assistance, please contact Beth Cole (for archeology) at bcole@mdp.state.md.us / 410-514-7631 or Amanda Apple (for historic built environment) at aapple@mdp.state.md.us / 410-514-7630. Thank you for providing us the opportunity to comment on this undertaking.

Sincerely,



J. Rodney Little
Director \ State Historic Preservation Officer
Maryland Historical Trust

JRL/EJC/ARA
201005319

cc: Stephen DelSordo (FCC)
Tina Rupert (Washington County DPW)
Rebecca Harriett (NPS Harpers Ferry)
Pamela Underhill (NPS Appalachian Trail)
Kevin Brandt (NPS C&O Canal)
Susan Pierce (WV SHPO)
Michele Miller (Appalachian Trail Conservancy)
Eric Whitenton (Citizens for the Preservation of Pleasant Valley)
Linda Irvin-Craig (Washington County Historical Society)