

SUPPLEMENTAL SECTION 4(f) EVALUATION

CONTRACT NO. HO 292-202-770

RELOCATED MARYLAND ROUTE 32

PROJECT LIMITS -
Pindell School Road to Maryland Route 108
Howard County, Maryland



prepared by
U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION

and
MARYLAND DEPARTMENT OF TRANSPORTATION
STATE HIGHWAY ADMINISTRATION

REPORT NO. FHWA-MD-4-F-92-02-F(S)

FEDERAL HIGHWAY ADMINISTRATION
REGION III

RELOCATED MARYLAND ROUTE 32
FROM PINDELL SCHOOL ROAD
TO MARYLAND ROUTE 108
HOWARD COUNTY, MARYLAND

ADMINISTRATIVE ACTION

FINAL SUPPLEMENTAL 4(f) EVALUATION

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
AND
STATE OF MARYLAND
DEPARTMENT OF TRANSPORTATION
STATE HIGHWAY ADMINISTRATION

SUBMITTED PURSUANT TO 49 U.S.C. 303(C) AND 23 U.S.C. 138

4/7/93

DATE



Federal Highway Administration
Robert E. Gatz, Director
Office of Planning and Program
Development - Region III

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COORDINATION

Public Notice of Location/Design Public Hearing

Correspondence with Maryland Historical Trust

Memorandum of Agreement

Correspondence with Howard County

Correspondence with U.S. Department of the Interior

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**Final Supplemental 4(f) Evaluation
Maryland Route 32
From Maryland Route 108 to Pindell School Road
Howard County, Maryland**

1. Introduction

Section 4(f) of the U.S. Department of Transportation Act (now Section 303C of Title 49 U.S.C.) states that utilizing land from a significant publicly owned public park, recreation area, wildlife refuge, or any significant historic site for a federally funded transportation project is permissible only if there is no feasible and prudent alternative to the use of such land and if all possible planning to minimize harm is included as part of the project.

Alignment improvements of MD 32 in Howard County from MD 108 to east of Pindell School Rd./Cedar Lane have been planned since the 1970's and the Final Environmental Impact Statement (Report No. FHWA-MD-EIS-72-07-(F)) was approved in July, 1977. Subsequently, existing and planned development in the area increased substantially and thus a Supplemental Final Environmental Impact Statement/Section 4(f) Statement (Report No. FHWA-MD-EIS-72-07-FS) for this section of MD 32 was prepared and approved in May 1989. The Selected Alternate included an interchange at MD 32/Pindell School Road/Cedar Lane and the reconstruction of Cedar Lane from Sanner Road to north of the Middle Patuxent River, where Cedar Lane is proposed to meet the Cedar Lane improvements recently constructed by Howard County.

At the time the Supplemental Final Environmental Impact Statement/Section 4(f) Statement (SFEIS) was approved, the Simpsonville Stone Ruins site, located immediately west of existing Cedar Lane north of existing MD 32, was recognized for the potential information it might yield through data recovery; however, it was believed to have minimal value for preservation in-place. The SFEIS recognized the potential for the site to be eligible for the National Register of Historic Places. (See SFEIS -p. III-18; IV-25)

Subsequently, a Phase II Archeological Investigation of the site was performed in late 1989 and early 1990. The investigation identified forty-seven archeological features and, based on the findings of the investigation, a potential Archeological District boundary was delineated. The investigation also identified the features within the proposed right-of-way of the MD 32 and Cedar Lane improvements and recommended Phase III investigation (mitigation) for many of those features which would be impacted by the construction. The Simpsonville Stone Ruins Archeological District is thought to be the most intact example of a colonial milling village in Maryland. Though important for preservation in place, data recovery will be undertaken in the areas impacted by roadway improvement.

The purpose of this evaluation is to document the impacts on the Simpsonville Stone Ruins Archeological District and the mitigation thereof, and the avoidance alternatives that have been considered.

2. **Proposed Action**

a. **Project Location and Description (See Figure 1)**

Existing Maryland Route 32 extends from Westminster in Carroll County to Interstate Route 97 near Annapolis in Anne Arundel County, and is an important transportation corridor between the City of Annapolis and the rapidly developing areas of Howard County. The current MD 32 project is located in central Howard County. It extends on new location from MD 108 to east of Pindell School Road/Cedar Lane and includes an interchange with and improvements to Cedar Lane. Cedar Lane extends from the Columbia area to MD 32, and then becomes Pindell School Road south of existing MD 32. Cedar Lane is a primary access route between Columbia and MD 32.

The proposed MD 32/Cedar Lane interchange is the focus of this document.

b. **MD 32 Mainline Selected Alternate (See Figure 2)**

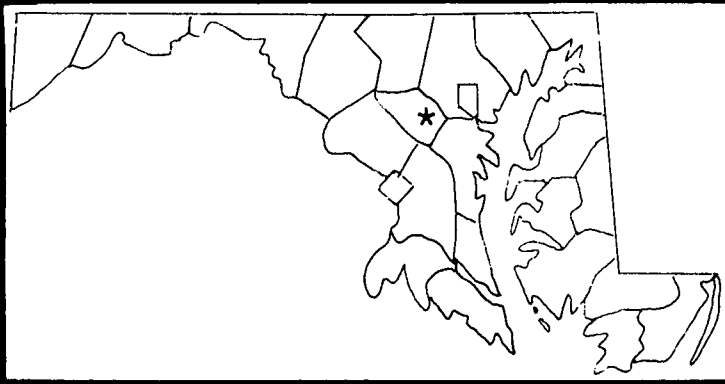
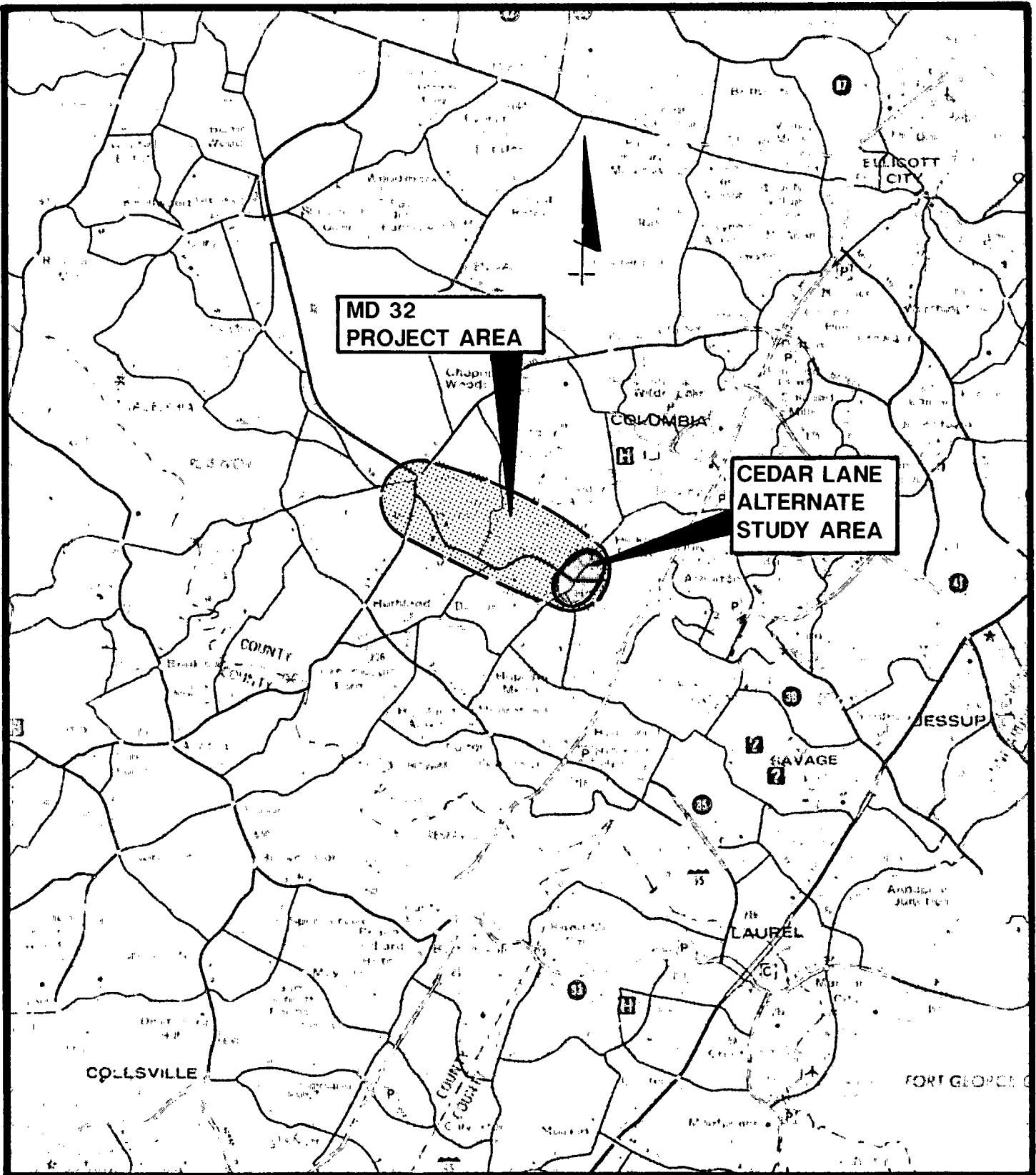
The Selected Alternate was designated Alternate B in the SFEIS/4(f) (p. II-3). Although minor refinements have been made during the final design phase, the final construction plans do not differ significantly from Alternate B as shown in the SFEIS.

MD 32 will be relocated north of its existing alignment starting with the extension of MD 32 west of MD 108 and continuing to the east on new location until east of Pindell School Road/Cedar Lane, where it will tie into existing MD 32. (A short section of MD 32 in the vicinity of Pindell School Road will be located south of existing MD 32.) The relocation of MD 32 will provide improved geometrics, access control and dualization of the roadway. A full-diamond interchange will be constructed at MD 108 and will require improvements to MD 108 in the vicinity of the interchange.

When the planned Riverhill Community (located east of MD 108 on both sides of the MD 32 Selected Alternate) develops, a half-diamond interchange may be provided west of Trotter Road. The interchange would provide connections between the Riverhill community and MD 32 to the east.

c. **MD 32/Cedar Lane Interchange Selected Alternate (See Figure 3)**

As shown in Figure 2, the improvements start at the intersection of Pindell School Road and Sanner Road with the widening of the existing roadway (Pindell School Road) and continue northeast along existing Pindell School Road and Cedar Lane to approximately 800 feet north of existing MD 32. (Pindell School Road is the extension of Cedar Lane south of MD 32.) The alignment then continues on new location, 200 feet west of existing Cedar Lane and



MD 32 / CEDAR LANE INTERCHANGE

LOCATION MAP

DATE
MAR. 12, 1992

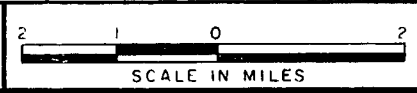


FIGURE
1

the existing bridge, in a northerly direction over the Middle Patuxent River. Approximately 950 feet north of the river, the alignment ties into the Cedar Lane improvements recently constructed by Howard County. The new structure over the Middle Patuxent River floodplain will be a bridge 258 feet long which will span over the western portion of the stone ruins of the mill. The present plan is to remove the newer portion of the existing bridge, and leave the original arch portion in order to provide pedestrian access and maintain the existing hydraulic conditions. North of the new bridge and south of the Cedar Lane/Corina Court intersection, an at-grade intersection will be constructed to connect the bypassed section of Cedar Lane and Guilford Road with the Cedar Lane improvements.

The improvement will consist of a four-lane undivided roadway north and south of MD 32, and a four-lane divided roadway with a 30-foot wide median for double left-turn lanes through the diamond interchange. The ramps on the west side of Cedar Lane will be single lane, while the two eastern ramps will each have two lanes.

The intersections of Cedar Lane/Pindell School Road with the interchange ramps are projected to operate at LOS D in 2015. The ramps themselves are also projected to operate at LOS D.

Relocated Cedar Lane will have a 40 mph design speed with maximum horizontal curvature at 1°-45'. The length of improvement will be approximately 4,150 feet, of which 1,300 feet will be on new location.

Five options were developed and evaluated for the structure to carry Cedar Lane over the Middle Patuxent River, summarized as follows:

	<u>Structure Type</u>	<u>Length</u>	<u>Constr. Cost</u>	<u>Wetland Impact (S.F)</u>
Option 1	3-span bridge	320'-6"	\$1,860,000	600
Option 2	1-span bridge	195'	2,300,000	-
Option 3	2-span bridge	295'-6"	2,580,000	-
Option 4	4-cell box culv.	--	1,740,000	22,348
Option 5	2-span bridge*	258'	1,560,000	5,650

* Selected Option

The impacts of Options 1, 3 and 5 on the features of the Archeological District are nearly identical and are described in Section 4; however, Options 2 and 4 would displace Feature 1, the mill ruins. Option 5 was selected following coordination with the Maryland Historical Trust, Corps of Engineers, Fish and Wildlife Service, and Department of Natural Resources considering hydraulic requirements, wetlands, and historic/archeological issues.

Two service roads are included in the Selected Alternate:

North Service Road - Located immediately north of and parallel to relocated MD 32, this road will provide access to the W.R. Grace and Riverhill Game Farm properties from Cedar Lane north of the MD 32 interchange area. It will also connect to the road network in the planned Riverhill community located west of the W.R. Grace property.

South Service Road - Located south of relocated MD 32 and west of Pindell School Road, this connection to be built between existing MD 32 and Sanner Road will maintain direct access to the east for the residences along existing MD 32.

Descriptions of the roadway typical sections are shown on Figure 18 of the SFEIS and Figure 8 herein.

d. Need for the Project

The following information summarizes the project need as presented in Section I of the SFEIS.

- MD 32

Existing MD 32 is a narrow, two-lane highway which experiences congestion and delay during peak hours. Planned residential and commercial development throughout the project area will place increasing demands on the existing roadway network. Average Daily Traffic (ADT) on MD 32 east of Pindell School Road/Cedar Lane is expected to increase from 23,000 in 1987 to 61,900 in the year 2015.¹ Due to the density of adjoining development and numerous entrances and intersections, it is not practicable to upgrade existing MD 32 to a 4-lane divided highway with access controls.

The construction of relocated MD 32 will provide a controlled-access high-speed east-west highway which will relieve much of the congestion experienced on the existing roadway network by removing much of the truck and commuter traffic. Traffic utilizing relocated MD 32 will no longer be required to pass through Clarksville. Completion of this segment of MD 32 will create a continuous high-speed highway between Interstate Route 70 (I-70) near Cooksville in Howard County and the City of Annapolis in Anne Arundel County.

¹ All traffic projections contained in this Evaluation are based upon Baltimore Council of Governments (COG) Round 3A Land Use projections, adjusted to reflect the Howard County 1990 General Plan Land Use. The projections have been coordinated with Baltimore COG and Howard County.

The accident rate on existing MD 32 is 287 accidents per one hundred million vehicle miles (287/100 MVM), which is considerably higher than the statewide average rate of 207 accidents/100 MVM for similar-type highways. Relocated MD 32, with its divided highway typical section and access control, is expected to have an accident rate of approximately 58 accidents/100 MVM, which is about one-fifth of the current rate. A detailed accident analysis, including data regarding the No-Build Alternate, is included on pages I-2, 3 and 4 of the SFEIS/4(f).

- Cedar Lane Interchange

The three improvements related to the interchange are:

- Pindell School Road/Cedar Lane
- Interchange
- Service Roads

Following is a summary of the need for each improvement:

o Pindell School Road/Cedar Lane

Pindell School Road/Cedar Lane extends from MD 216 (2.7 miles south of MD 32) into Columbia (2.8 miles north of MD 32). It is classified a minor arterial in Howard County's 1990 General Plan: Highways Map 2010 and is a major access route for Columbia as well as the area south of MD 32.

Howard County recently reconstructed Cedar Lane north of the Middle Patuxent River to provide a four-lane roadway. From the terminus of that project southward to MD 216, Cedar Lane/Pindell School Road is a two-lane roadway. In the vicinity of the Middle Patuxent River, the existing road has sharp horizontal and vertical curvature, adequate for a design speed of only 25 mph, whereas the minimum design speed for minor arterials is 40 mph.

There were 41 reported accidents from 1987 through 1989 on the 0.5 mile section of Cedar Lane north of MD 32, resulting in a rate of 473 accidents/ 100 million vehicle miles (MVM), which is more than double the statewide rate of 204 for similar type highways. Of these accidents, 18 involved injury, resulting in an accident injury rate of 200 accidents/100 MVM, which again is significantly higher than the statewide rate of 107 for similar type highways. A large number of the accidents occurred near the Cedar Lane/

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Guilford Road intersection, where there is a sharp horizontal curve near the bottom of a 7% grade.

The 1987 ADT on Cedar Lane north of MD 32 was 15,000 and the projected 2015 ADT No-Build ADT is 33,000, far greater than the capacity of the existing two-lane roadway. Between MD 32 and Sanner Road, the projected 2015 ADT (Build or No-Build) on Pindell School Road is 18,600, while south of Sanner Road it is 12,800. Although improvement of Pindell School Road immediately south of Sanner Road is not included in Howard County's 5-year plan for projects, the eventual need is indicated in the County's General Plan.

In summary, existing Cedar Lane/Pindell School Road has substandard alignment and inadequate width to accommodate the traffic projected for the year 2015.

o Interchange

Since MD 32 will be a controlled access highway from west of MD 108 to I-97, a distance of approximately 21 miles, and considering the extremely high traffic volumes projected to occur on both Cedar Lane and MD 32, it is not reasonable to provide an at-grade intersection at Cedar Lane. Thus, the only way to provide access between MD 32 and Cedar Lane is an interchange. The proposed interchange is a full diamond, with the four ramps projected to carry a total of 39,400 vehicles per day in 2015.

Elimination of this interchange would divert traffic to other roadways and result in severe congestion as described in Section 5b-i of this report.

o Service Roads

The North Service Road will provide the only access to the W.R. Grace Company and Riverhill Game Farm properties. In addition, it is planned to ultimately connect to the roadway network in the planned Riverhill community. The projected 2015 ADT on this road is 6,700.

The South Service Road will connect Guilford Road (existing MD 32) to Pindell School Road, providing access to the east for the residences along existing MD 32. The projected 2015 ADT on this road is 5,300.

3. Description of 4(f) Properties

a. Simpsonville Stone Ruins Archeological District

The following paragraphs are paraphrased from the September 1990 final report "Phase II Archaeological Investigations at the Simpsonville Stone Ruins (18HO80) and the Heritage Heights Site (18HO149), Howard County, Maryland". The entire report is available for review at the Maryland State Highway Administration.

The Simpsonville Stone Ruins Archeological District is the remains of a late eighteenth to early twentieth century rural milling community associated with some of the founding families of Howard County. The stone mill ruins stand at the center of a significant cluster of ruins of small residential and commercial shops including a general store, a wheelwright shop and possible blacksmith shop. Dispersed around this cluster of commercial structures stand the remains of once-stately homes belonging to the immediate descendants of Richard Owings, a member of one of the most prominent milling families of Maryland. His grave is also located on the eastern hill overlooking the site. This location is also documented to have been the most likely location of his mansion, which was later converted into a woolen factory.

The Simpsonville Mill Seat served the immediate community for flour milling and textile production. Unlike some of the smaller mill sites in Maryland, Simpsonville served a variety of needs and functioned as the town center for over two hundred years. Although it is smaller than the merchant mills at Owings Mills and Ellicott City, Simpsonville probably supplied raw materials for trade in the economic exchange network of the grain and textile industry during its height in Maryland circa 1790-1930.

The archeological investigations combined with the historical research suggest that the site may date as early as the late eighteenth century. Excavations yielded evidence of deeply buried, potentially undisturbed, stratified deposits. Many structural foundations were identified during archeological excavations which had not been documented on existing historic maps. Other structures tested during the field investigation were compared to those recorded on the historic maps of 1860 and 1878. Artifacts recovered from the structural foundations consist of a variety of architectural, domestic, and industrial items, and

indicate the presence of archeological deposits associated with the various property types contained within the Simpsonville Mill Seat. Interpretation of the results indicated that intact, late eighteenth-century material, possibly related to the original mill construction, might still be located at the site.

More detailed information on the site is contained in the aforementioned report.

The State Historic Preservation Officer (SHPO), the State Highway Administration, and the Federal Highway Administration have agreed that the Simpsonville site is eligible for listing on the National Register of Historic Places as an Archeological District. The following excerpt from the letter from the SHPO to the SHA (6/7/90 - see Appendix) summarizes the rationale for this determination:

The Simpsonville site is eligible for listing in the National Register of Historic Places as a district due to its significant concentration of buildings and structures in a late eighteenth through early twentieth century mill village important at the local level. Phase II testing at 18H080 has documented that this district reflects the importance of mills in the economic development of Howard County. This research also has shown the Simpsonville village to consist of a distinguishable collection of mill-related structures, some of which embody the earliest development of mill technology. Furthermore, the investigations of 18H080 demonstrated deep and potentially stratified archeological deposits; integrity of structural relationships; and capacity to yield important information contributing to the following historic period themes identified in the Maryland Comprehensive Historic Preservation Plan: agriculture; architecture; cultural; and economic. For these reasons, it is our opinion that 18H080 meets National Register "Criteria A, C, and D" (36 CFR 60.4), and thus is eligible for inclusion in the National Register of Historic Places.

The applicable National Register criteria are as follows:

- A) Are associated with events that have made a significant contribution to the broad patterns of our history

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- C) Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction
 - D) Have yielded, or may be likely to yield, information important in prehistory or history.

The Simpsonville District is significant under Criterion A because the grain milling industry was critical to Maryland's transition from a tobacco-based economy before the early or middle 18th century to one based on the grain trade. During this period, the Middle Atlantic region became one of the world's leading grain producers, and the growth of the port of Baltimore was dependent on the grain trade. Simpsonville is significant under Criterion C because, as a District, it represents a significant and distinguishable entity, even though specific components may lack individual distinction. The District is significant under Criterion D because it has the potential to yield stratified deposits dating to the late eighteenth century. Simpsonville is also significant because of its potential to yield important information about the Agriculture, Architecture, Cultural, and Economic themes in the Maryland Comprehensive Preservation Plan. Recognizing the significance of the District, the Federal Highway Administration, the Advisory Council on Historic Preservation, the Maryland Historical Trust, and the Maryland State Highway Administration have entered into a Memorandum of Agreement (MOA) that specifies measures to be undertaken to mitigate the effects of construction on the District. These measures include archeological data recovery investigations, public interpretation of the site, avoidance of significant parts of the District through modification of the bridge design, and preservation in place of parts of the District not affected by construction through execution of an historic preservation easement. This easement will ensure that parts of the site owned by the State of Maryland will be protected from further encroachment.

It should be noted that few of the features remain standing, but the remaining subsurface archeological features reflect the original organization of the milling community and provide the opportunity for archeological investigation of such communities. Other examples of historic mills and mill villages are better preserved in that they contain extant structures (e.g. Savage Mill and Ellicott City in Howard County), and some mill structures in the state contain milling machinery, both operable (Rock Run Mill, Union Mill, and Wye Mill) and not (Monkton Mill, Trenton Mill). However, because the area around the Simpsonville Mill was abandoned as a focus of settlement in the early 20th century, Simpsonville's subsurface archeological deposits are relatively well preserved. Simpsonville thus serves as a very good archeological example of a mill village, and while few structures or ruins are left standing, the significance of the District rests in its intact, subsurface archeological deposits more so than in its standing ruins.

The SHPO has determined that the proposed action will adversely affect the Archeological District. (See Sections 4a and 6 for information regarding impacts and mitigation).

Section 4(f) applies to the Archeological District because of the combination of the following factors:

- The District is eligible for the National Register of Historic Places.
- The District contains a relatively intact and undisturbed collection of archeological features of a significant community associated with the early colonial milling industry in Maryland.
- The District is important not only for the data it contains which can be recovered, but also for the intact arrangement of subsurface features.

The proposed District, shown on Figures 2 and 9, encompasses three separate areas:

- the main area encompasses 24± acres along and near the Middle Patuxent River and contains all but two of the archeological features of the district.
- the Owings-Myerly House (F33) area, which includes the still-standing residence and 3± acres around it.
- the Owings Cemetery (F46), encompassing 0.25± acre. Several headstones and a fence around the cemetery still remain.

The latter two areas are included in the proposed District because of their association with Simpsonville. The Owings-Myerly House, built in the late 1840s by Henry Owings, who owned the mill, is separated from the main area by a 300'± wide strip of land which includes existing MD 32. When MD 32 was constructed, a large cut was made on the north and east side of the house, with the road being approximately 60 feet lower than the house. Phase II archeological investigations indicate that archeological deposits at the Owings-Myerly House are of recent (late 19th/20th century) age, and are unlikely to provide important information. The Owings Cemetery is separated from the main area by a 250'± wide strip of land on which two residences have recently (since 1980±) been constructed.

The features identified within the proposed District, as shown on Figure 9 (in pocket in Appendix), are as follows:

- F 1: Mill*
- F 2: Headrace
- F 3: Structural foundation*
- F 4: General Store
- F 5: Possible earthen terrace
- F 6a: Buried alignment*
- F 6b: Feature complex*
- F 6c: Southern foundation*
- F 7: Structural foundation
- F 8: Terraced platform area
- F 9: Concrete floodgate
- F 10: Bridge abutments/piers*
- F 11: Possible sawmill
- F 12: Waste race
- F 13: Pre-1949 road alignment
- F 14: Watergate*
- F 15: Main dam*
- F 16: Structural foundation*
- F 17: Structural foundation*
- F 18: Mill path
- F 19: Possible watergate
- F 20: Ash layer (Part of F45)
- F 21: Part of F 6b
- F 22: Concrete lined pit
(Part of F1)
- F 23: Wheelwright location
- F 24: Possible rock quarry
- F 25: Magnetic anomaly*
- F 26: Part of F 6b
- F 27: Part of F 6b
- F 28: Blacksmith location
- F 29: Possible fill for F 13
- F 30: Structural foundations*
- F 31: Possible pavement (Part of F25)
- F 32: Possible trench (Part of F25)
- F 33: Owings - Myerly House
- F 34: Waste race
- F 35: Wheelpit*
- F 36: Wheelpit dam*
- F 37: Possible rock quarry
- F 38: Concrete steps
- F 39: Miller's House
- F 40: Robinson house
- F 41: Sensitive area
- F 42: Tenant cabin location
- F 43: Sensitive area
- F 44: Oyster midden (Part of F6b)
- F 45: Sensitive area
- F 46: Owings Cemetery
- F 47: Tailrace

* Considered to be the most archaeologically significant features based on their potential to provide important information.

b. Middle Patuxent Environmental Area (See Figure 10 in Appendix)

The Middle Patuxent Environmental Area, the largest open space area in Howard County, encompasses approximately 1,046 acres of the Middle Patuxent River Valley between Mill Road/Cedar Lane (immediately north of MD 32) and MD 108. The area has outstanding natural qualities including an extraordinarily diverse and interesting vegetative cover, and a correspondingly diverse fauna including several species of wildlife deserving of special recognition. However, none of these species was located in the project vicinity.

Howard County currently owns approximately 66 acres of the Environmental Area, and expects to obtain the remaining 980 acres, of which approximately 950 are currently owned by The Howard Research and Development Corporation, the principal developer of adjoining subdivisions.

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The Management and Development Study completed by the Howard County Department of Recreation and Parks in 1981 recommends a preliminary development concept which includes a Nature Center approximately two miles north of the Middle Patuxent River/Cedar Lane bridge (see Figure 10). In addition, a primary trail is proposed to link with the riverfront trail which is proposed to continue south along the river.

The Nature Center is a joint venture between the Howard County Department of Education and the Department of Recreation and Parks.

The primary trail will be a multi-purpose trail available for hiking, with limited usage for horseback riding and bicycling. The proposed bridge to carry Cedar Lane across the Middle Patuxent River will accommodate the planned trail under the structure while the present structure does not.

The Department of Recreation and Parks intends to incorporate the portion of the Simpsonville District within the Environmental Area into the master plan for the Area. (See letter from Howard County dated June 24, 1992, and the MOA in the Appendix.)

The portion of the Middle Patuxent Environmental Area in the vicinity of Cedar Lane was treated as a 4(f) site in the SFEIS because although privately owned by The Howard Research and Development Corporation (HRD), its transfer to Howard County was thought to be imminent. However, the land is still owned by HRD, from which the SHA will purchase the area required for the MD 32 and Cedar Lane improvements. Although the property impacted may not be considered a 4(f) site as parkland, the SHA and FHWA are providing mitigation due to its eligibility for the National Register as an archeological district. It should be noted that the 60'± wide right of way on the north side of Mill Road (See Figure 3) is owned by Howard County and therefore is 4(f) property. All of this area is undeveloped and there are no plans to develop it except for the trail mentioned above and the measures to be taken in the Simpsonville Stone Ruins Archeological District as outlined in the MOA in the Appendix.

4. Description of Impacts of Selected Alternate (See Figures 3, 3A and 9)

a. Simpsonville Stone Ruins Archeological District

The construction of the MD 32 mainline will impact the Owings-Myerly House (F33) and the 3± acres portion of the Archeological District surrounding it. The road will be 20'± lower than the existing ground at the house, requiring demolition of the

house and regrading of the entire area. The State Historic Preservation Officer has determined that from an architectural viewpoint the house itself is not eligible for the National Register.

Relocated Cedar Lane will pass through the floodplain area of the Archeological District, requiring the acquisition of 8.7 acres and impacting the following features:

<u>Features to be Disturbed By Construction</u>	<u>Features Within Right of Way But Not to be Disturbed By Construction</u>
F1 ^a Mill*	F2 Headrace
F4 General Store	F3 Structural foundation*
F11 Possible sawmill	F9 Concrete floodgate
F12 Waste race	F17 ^c Structural foundation*
F13 ^b Pre-1949 road alignment	F18 Mill path
F23 ^d Wheelwright location	F22 Concrete lined pit (Part of F1)
F28 ^e Blacksmith location	F25 Magnetic anomaly*
F30 ^f Structural foundation*	F31 Possible pavement (Part of F25)
F47 Tailrace	F32 Possible trench (Part of F25)
	F35 Wheelpit*
	F36 Wheelpit dam*

* Considered to be the most archaeologically significant features based on their potential to provide important information.

a Only the unstable upper part of the mill ruins will be affected. The lower ruins will be left in place and stabilized. The archeological deposits will not be affected.

b The affected portion of the road alignment currently provides residential access and does not require archeological mitigation.

c It is thought that F17 is between the grading limits of Relocated Cedar Lane and the improvement of existing Cedar Lane, and thus will not be impacted by construction. Fencing will be provided. However, there is a possibility that it may be affected by the toe of the fill slope and if so, provisions have been made to mitigate the adverse effects through data recovery.

d A portion of F23 will be impacted by the roadway slopes; the remainder of the site will be protected with fencing during construction. The adverse effects will be mitigated through data recovery.

- e F28 is currently highly disturbed; however, any data recovery possible will be made through the Phase III Archeological Survey.
- f The impacts to F30 occur on the periphery of the feature. Mitigation will be effected through data recovery.

Considerable effort has been made during the design of this project, particularly the Relocated Cedar Lane Bridge over the Middle Patuxent River, to avoid significant, intact archeological features (See Figure 3A). The bridge will have one pier, located in an area devoid of archeological features. The south abutment will be located in a disturbed area, and the north abutment will be on a rock outcrop largely removed from important archeological features.

F1, the Mill, was a three and one-half story stone and wood structure. The roof, upper stories and interior flooring no longer exist and only a portion of the stone walls remains. The bridge carrying Cedar Lane over the Middle Patuxent River will pass over the Mill, with the bottom of the bridge being 14'± above the ground. The upper part of the mill ruins, which are unstable as a result of decades of neglect, will be removed both as a safety measure and to provide clearance for the bridge. (See Figure 3A) According to photographic evidence, the ruins have deteriorated substantially over the last 35 years, and the north and east walls are gone. The remaining walls continue to deteriorate due to their instability, and portions have fallen since 1987. However, structural analysis has determined that the lower portions of the walls are stable. These will be preserved in place and restored to prevent further deterioration. Furthermore, construction will not affect the subsurface archeological deposits associated with the mill.

Part of Feature 4 (general store) will be affected by construction of the north abutment. A small portion of F11 (possible subsurface remnants of a sawmill) and a portion of F12 (swale that was once a waste race) will be impacted by construction of the bridge pier. Portions of F13 (graded area that was once a road) and F23 (wheelwright location), F28 (surface and subsurface remnants of blacksmith shop) and a portion of F30 (structural foundation) will be impacted by the roadway grading. A portion of F47 (swale that was once a tailrace) will be covered with protective matting and fill and crossed by equipment needed to construct the bridge. Archeological data recovery investigations will be undertaken at all affected features to mitigate the effects of construction.

The State Historic Preservation Officer (SHPO) has determined that the proposed action will adversely affect the District. However, the SHPO also expressly realizes that the chosen alternate adequately balances cultural resource concerns with other important issues; that the Memorandum of Agreement (MOA) represents an appropriate consideration of historic properties (July 31, 1992 letter) and provides for appropriate treatment of this historic property (July 24, 1992 letter); and that implementation of the Memorandum of Agreement constitutes adequate and acceptable mitigation of all adverse effects from the proposed undertaking on the District (August 12, 1991 letter). See Section 6 for discussion of mitigation. The MOA and the above-referenced letters are included in the appendix. (Please note that Figure 3 of the MOA may not reflect all the impacts of the Selected Alternate on the Archeological District. Refer to the discussion herein and in the text of the MOA for detailed information of the impacts.)

b. Middle Patuxent Environmental Area

The Selected Alternate will require 1.91 acres of the proposed 1046 acre^a Middle Patuxent Environmental Area: 0.14 acre from the 60'± wide right of way on the north side of Mill Road owned by Howard County, and 1.77 acres adjacent to Cedar Lane currently owned by HRD. The difference between this 1.91 acre impact and the 0.98 acre impact described in the SFEIS is attributable to two factors:

- the SFEIS (Figure 17) assumed the excess area between existing and relocated Cedar Lane would not be purchased, whereas the final design includes acquisition of this land.
- the SFEIS showed the western right of way line of Relocated Cedar Lane being 125'± west of the road centerline at the bridge over the Middle Patuxent River, whereas the final design plans show it 140'± west of the centerline.

Both of these areas are needed to facilitate construction of the bridge.

The impact area is at the extreme south end of the Environmental Area and thus the project will not split the Environmental Area.

Mitigation of the project's impacts on the Middle Patuxent Environmental Area is discussed in the SFEIS (p. IV-26).

^a Howard County currently owns approximately 66 acres of the proposed 1046 acre total. See Section 3-b for more detailed information.

c. **Engineering/Environmental**

Both the MD 32 mainline and Cedar Lane follow existing roadway corridors under the Selected Alternate. The maximum degree of curvature on MD 32 will be 1°-14', while on Cedar Lane it will be 1°-45', well below the maximum allowed by design criteria (4°-15' on MD 32; 10° on Cedar Lane). For safety considerations, it is highly desirable to maintain this relatively flat curvature through the interchange area.

In addition to providing the safety benefit of the flat curvature, utilization of the existing roadway corridors also minimizes natural environmental and community impacts. Section 5a addresses the impacts associated with shifts of the MD 32 mainline.

Focusing on the MD 32/Cedar Lane interchange, the Selected Alternate will impact 0.40 acre of floodplain, 0.56 acre of wetland, 9.4 acres of woodland and require no stream relocation. The maximum depth of cut will be 20 feet. Approximately 1300 linear feet of Relocated Cedar Lane will be on new location. The Selected Alternate will disturb the least land area of any of the build alternates under consideration, and thus have the lowest erosion/sedimentation potential. One residence (Owings-Myerly House currently owned by the SHA and part of the Simpsonville Archeological District) and no businesses will be displaced. A new road will not be placed any closer to a residence than an existing road.

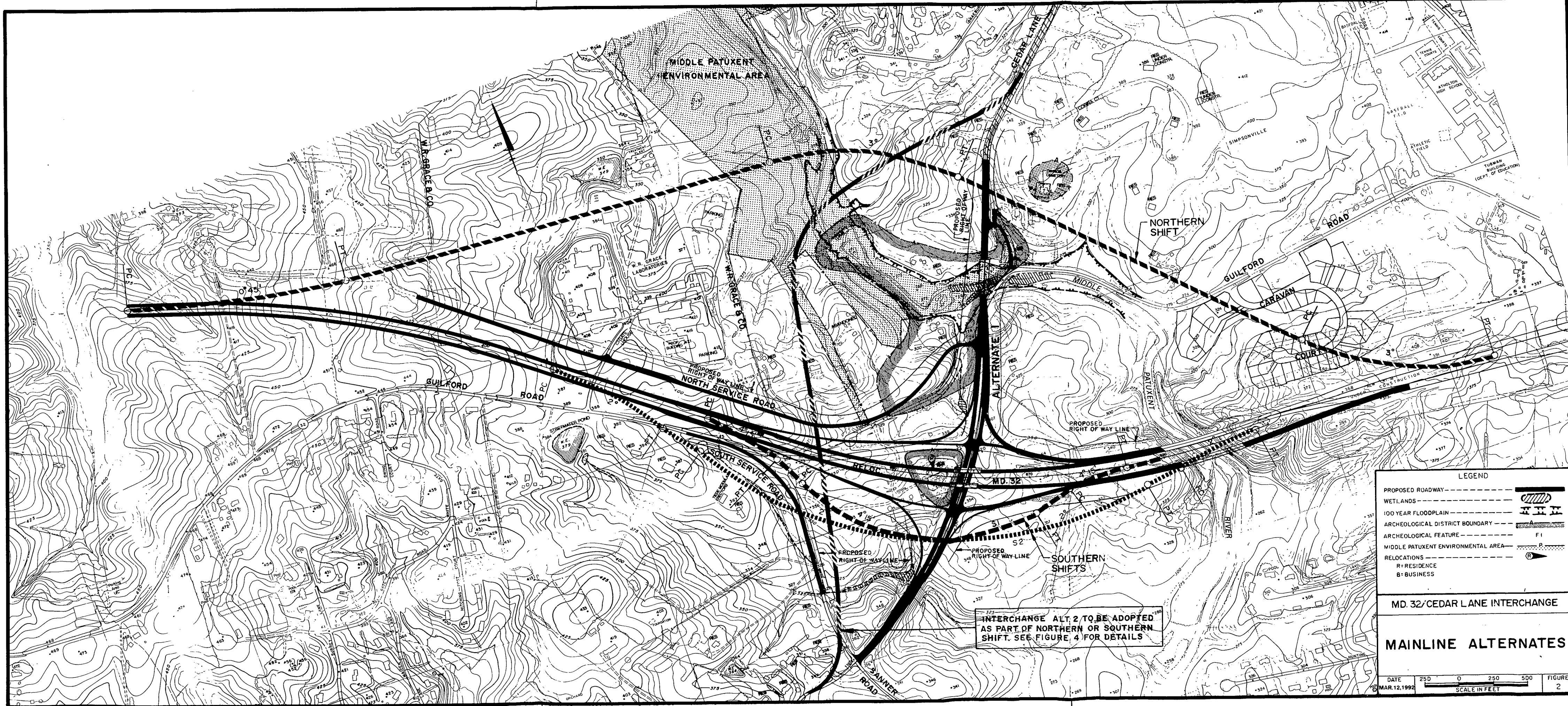
5. **Other Alternates Considered**

a. **MD 32 Mainline (See Figure 2)**

i. **No-Build**

The No-Build Alternate would retain the existing two-lane MD 32 roadway with at-grade intersections from MD 108 to east of Cedar Lane. Under the No-Build Alternate, the Average Daily Traffic is expected to increase to 61,900 on MD 32 east of Pindell School Road, and 38,700 west thereof. The intersections of MD 32 with MD 108 and Cedar Lane would both operate at LOS F. The existing high accident rate would continue (287/100 MVM compared to the anticipated rate of 58/100 MVM under any of the build alternates). The congestion and high accident rate would be compounded by the fact that although MD 32 has access controls for a distance of approximately 17 miles east of Cedar Lane, this section would remain with numerous intersections and entrances.

For the above reasons, the No-Build Alternate is not considered to be a reasonable alternate.



MIDDLE PATUXENT ENVIRONMENTAL AREA

NORTHERN SHIFT

SOUTHERN SHIFTS

W. GRACE ROAD

GUILFORD ROAD

W. R. GRACE LABORATORIES

NORTH SERVICE ROAD

SOUTH SERVICE ROAD

CEDAR LANE

ALTERNATE

MIDDLE PATUXENT RIVER

GUILFORD ROAD

CARAVAN

COURT

PROPOSED RIGHT OF WAY LINE

PROPOSED RIGHT OF WAY LINE

MD. 32

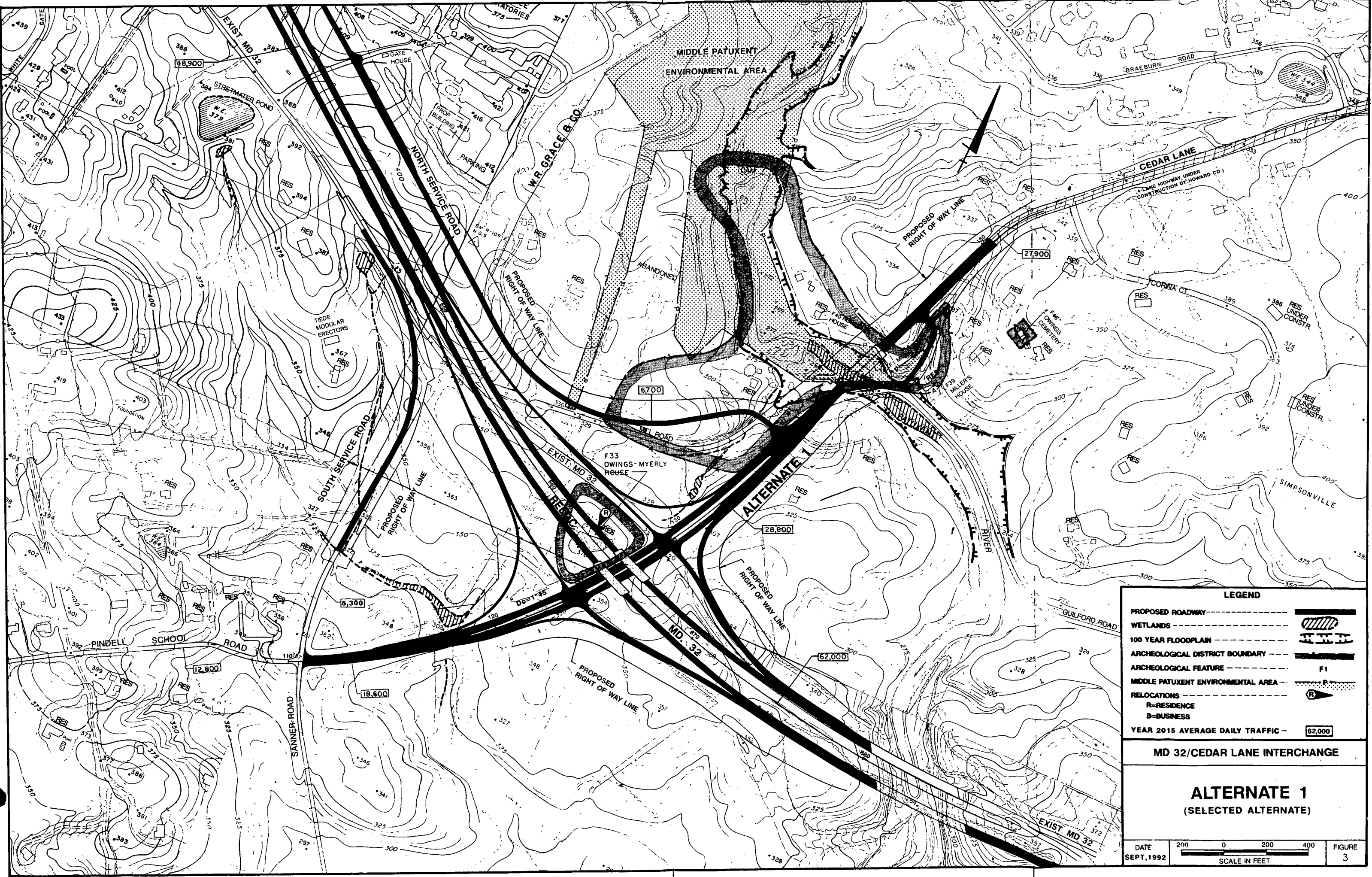
INTERCHANGE ALT. 2 TO BE ADOPTED AS PART OF NORTHERN OR SOUTHERN SHIFT. SEE FIGURE 4 FOR DETAILS

LEGEND	
PROPOSED ROADWAY	
WETLANDS	
100 YEAR FLOODPLAIN	
ARCHEOLOGICAL DISTRICT BOUNDARY	
ARCHEOLOGICAL FEATURE	
MIDDLE PATUXENT ENVIRONMENTAL AREA	
RELOCATIONS	
R=RESIDENCE	
B=BUSINESS	

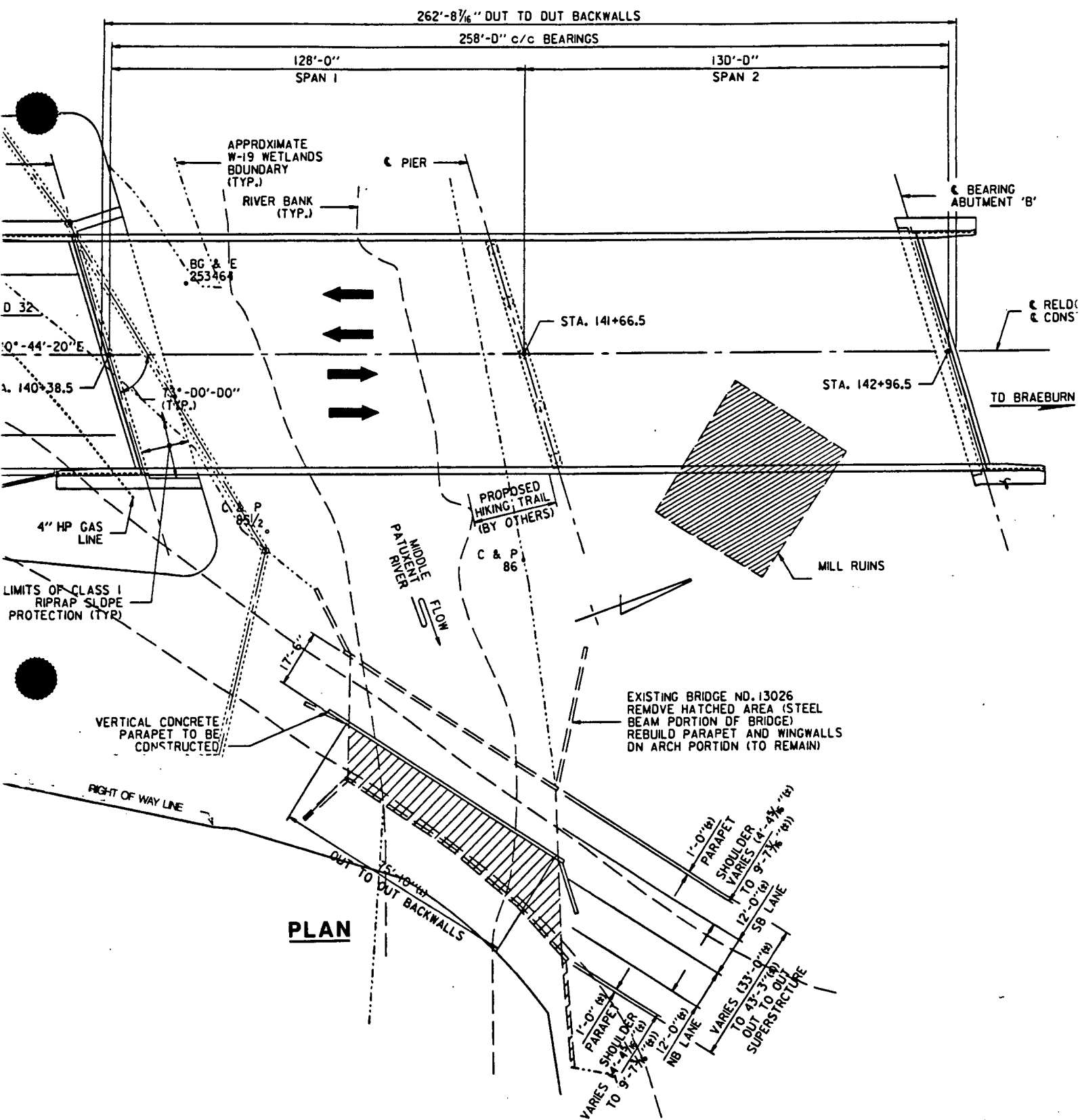
MD. 32/CEDAR LANE INTERCHANGE

MAINLINE ALTERNATES

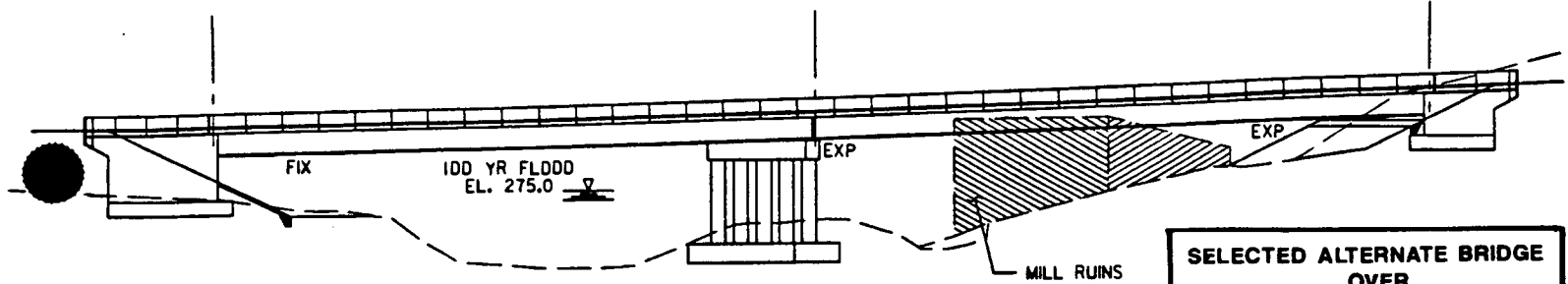
DATE MAR. 12, 1992 SCALE IN FEET 250 0 250 500 FIGURE 2



LEGEND	
PROPOSED ROADWAY	
WETLANDS	
100 YEAR FLOODPLAIN	
ARCHAEOLOGICAL DISTRICT BOUNDARY	
ARCHAEOLOGICAL FEATURE	F1
MIDDLE PATUXENT ENVIRONMENTAL AREA	
RELOCATIONS	
R=RESIDENCE	
B=BUSINESS	
YEAR 2015 AVERAGE DAILY TRAFFIC	
MD 32/CEDAR LANE INTERCHANGE	
ALTERNATE 1 (SELECTED ALTERNATE)	
DATE SEPT, 1992	 SCALE IN FEET
FIGURE 3	



PLAN



ELEVATION

**SELECTED ALTERNATE BRIDGE
OVER
MIDDLE PATUXENT RIVER**

SCALE: 1"=40

FIGURE
3A

ii. Northern Shift

The Middle Patuxent Environmental Area extends northward to MD 108, approximately 3 miles north of MD 32 at Cedar Lane. Thus, it is not possible to avoid the Environmental Area without shifting MD 32 north of MD 108. Such a shift would severely impact the heavily developed area of Columbia and is not considered to be reasonable.

A shift of the MD 32 centerline to the north to avoid the Simpsonville Stone Ruins Archeological District is shown on Figure 2.

The alignment would curve to the north of the existing MD 32 corridor and pass through the W.R. Grace and Company facility, a major chemical manufacturer.

The alignment would then cross the Middle Patuxent River 1800'± upstream of the existing Cedar Lane bridge, thereby acquiring 4± acres of the Middle Patuxent Environmental Area and separating an additional 15 acres from the remainder of the park. There are currently no roadway crossings of the river or adjoining park between Cedar Lane and MD 108, a distance of 17,000'±.

The alignment would cross Cedar Lane just south of Corina Court, passing between the floodplain section of the Archeological District and the Owings Cemetery. Approximately six residences would be displaced.

MD 32 would then cross Guilford Road near Caravan Court, displacing approximately 20 of the 42 houses recently constructed in this area, and connect to existing MD 32 just west of the existing interchange with US 29.

In addition to the greater impact on the W.R. Grace and Company facility, the Middle Patuxent Environmental Area, and the community, the northern shift would require use of 3° curves, whereas the maximum curvature on the Selected Alternate alignment is 1°-14'. The use of the sharper curves is highly undesirable in the interchange area because of the resulting driver confusion regarding the location of exit gores.

Another major problem with a northern shift is the manner in which the interchange with Cedar Lane would have to be provided. Since improvement of Cedar Lane in or near its existing corridor would impact the Archeological District, thereby defeating the purpose of the northern shift, Cedar Lane would have to be relocated to avoid the District,

probably similar to Alternate 2 described in Section 5b-iii. This would substantially increase the impacts beyond those described above. (See Section 5b-iii for a description of the probable additional impacts.) Furthermore, provision of the interchange would require relocation of Corina Court to the north to provide adequate spacing between it and the diamond ramps on the north side of MD 32, and one additional bridge to carry the ramp from eastbound MD 32 to Relocated Cedar Lane over the Middle Patuxent River.

The cost of the northern shift is estimated to be approximately \$22,000,000 more than the cost of the Selected Alternate. This does not include the cost of right of way and the acquisition of at least one building from the W.R. Grace and Company facility. The area through which the northern shift passes on the Grace property is thought to be contaminated with hazardous materials; the cost of the cleanup may be substantial and is not included in the above estimate.

For the above-described reasons, the northern shift of the MD 32 mainline is not considered to be a reasonable alternate.

iii. Southern Shift

Two alignment shifts of the MD 32 mainline to the south to avoid the Archeological District have been considered and are shown on Figure 2. Both would require adoption of Cedar Lane Alternate 2 as described in Section 5b-iii; otherwise, the impact to the Archeological District would not be reduced.

The first shift considered, S1, extended from 800'± east of the W.R. Grace and Company gatehouse to the existing MD 32 bridge over the Middle Patuxent River. This shift would require reversing 4°15' curves, displace one additional residence and require an additional 200'± of stream relocation. As with the northern shift, this would result in the use of sharp curves within the interchange area, resulting in a less safe design than with the Selected Alternate due to possible driver confusion at the ramp gores. Excluding right of way, this alignment is expected to cost approximately \$7,000,000 more than the Selected Alternate and would have the additional impacts associated with Cedar Lane Interchange Alternate 2 described in Section 5b-iii.

A second option considered involved the use of reversing 2° curves, and extended from 400'± west of the Grace gatehouse to 500'± east of the Middle Patuxent River. This shift would displace four additional residences, and require an additional 200'± of stream relocation and replacement of the existing bridge over the river. While this option would result in an acceptable alignment within the interchange area (although the 2° curves are sharper than the 1°-14' curve on the Selected Alternate), it would cost approximately \$10,000,000 more than the Selected Alternate, excluding the additional right of way cost. It would also have the additional impacts associated with Cedar Lane Interchange Alternate 2.

For the reasons described above, especially considering the impacts of the southern shifts in combination with the additional impacts of Cedar Lane Interchange Alternate 2 described in Section 5b-iii, the southern shifts of the MD 32 mainline are not considered to be reasonable alternates.

A variation of the southern shift is further described in Section 5-C.

b. Cedar Lane Interchange

There is an infinite number of possible interchange alternates, from the viewpoints of both extent of improvement and roadway alignments. The alternates described herein best represent the possible improvements within these ranges.

i. No-Build Alternate

The Cedar Lane Interchange No-Build Alternate would consist of MD 32 overpassing existing Cedar Lane, and no connection for traffic between the two roadways, thus eliminating traffic movements that have occurred at this intersection for many years. No improvements would be made to Cedar Lane. Although this alternate would reduce impact to the Archeological District, it would still displace F33, the Owings-Myerly House.

The ramifications of the No-Build Alternate are as follows:

- would retain the substandard alignment and width of existing Cedar Lane in the vicinity of the Middle Patuxent River, thereby continuing the high accident rate in this area.
- would be inconsistent with the Howard County 1990 General Plan.

- would divert the 39,400 vehicles per day (vpd) anticipated to use the interchange ramps in the year 2015 to the adjoining interchanges (MD 108 to the west and US 29 to the east).
- would increase traffic on Guilford Road west of Pindell School Road from the 5300 vpd anticipated in 2015 under the build alternates to 18,450, resulting in LOS E.
- would decrease anticipated 2015 level of service at the MD 32/MD 108 interchange from LOS D under the build alternates to LOS F (with volume exceeding capacity by 29%).
- would increase traffic on local and collector residential streets as motorists access US 29 via the partial interchange at Seneca Drive.
- would increase traffic through the US 29/Broken Land Parkway interchange, which is anticipated to operate at LOS D in 2015 without the diverted traffic.

For the above reasons, the Cedar Lane Interchange No-Build Alternate is not considered to be a reasonable alternate.

ii. Partial Interchange Alternate

This alternate would provide the following features:

- Improvement of Pindell School Road from the north side of MD 32 to the south as shown for Alternate 1 on Figure 2
- MD 32 overpass of Pindell School Road
- Ramps to and from eastbound MD 32 and ramp from westbound MD 32 to Cedar Lane (as shown for Alternate 1)
- Realignment of Mill Road to intersect Cedar Lane opposite the ramp from westbound MD 32

The principal differences between this alternate and Alternate 1 are the elimination of the ramp from Cedar Lane to westbound MD 32 and the retention of the existing Cedar Lane roadway north of MD 32.

28

This alternate would have the same impact on the Archeological District as the Cedar Lane Interchange No-Build Alternate, namely, the displacement of F33, the Owings-Myerly House.

The ramifications of this alternate are as follows:

- would retain the substandard alignment and width of existing Cedar Lane in the vicinity of the Middle Patuxent River, thereby continuing the high accident rate in this area.
- would be inconsistent with the Howard County 1990 General Plan.
- would divert the 6,575 vehicle per day anticipated to use this ramp in the year 2015 to the MD 108 interchange.
- would increase traffic on Guilford Road west of Pindell School Road from the 5300 vph anticipated in 2015 under the build alternates to 11,875 vpd, resulting in LOS E.
- would decrease the anticipated 2015 level of service at the MD 32/MD 108 interchange from LOS D under the build alternates to LOS F (with volume exceeding capacity by 29% - this is the same as would occur under the Cedar Lane Interchange No-Build Alternate described earlier).
- would preclude motorists who exit westbound MD 32 at Cedar Lane from directly reentering MD 32 in the westbound direction.

For the above reasons, the Partial Interchange Alternate is not considered to be a reasonable alternate.

iii. Alternate 2 - Western Total Avoidance Alternate

As shown on Figure 4, the alignment would begin approximately 700 feet west of the Pindell School Road/Sanner Road intersection, curve to the north on new location and continue northerly to cross the proposed MD 32 centerline approximately 1100 feet west of the Alternate 1 alignment crossing. The alignment would continue in a northerly direction to approximately 1200 feet north of relocated MD 32 at which point it would curve to the east, avoiding the northern and western most boundary of the Archeological District. The alignment would continue toward the east and tie into the Howard County Cedar Lane improvements approximately 850 feet north of the Alternate 1 tie-in.

Corina Court would be extended 100 feet to connect with relocated Cedar Lane. The existing Cedar Lane/Corina Court intersection and the existing bridge over the Middle Patuxent River would be maintained to allow access from relocated Cedar Lane to the bypassed section of existing Cedar Lane and to Guilford Road.

Relocated Cedar Lane would have a 40 mph design speed, with maximum degree of horizontal curvature being 6°, and would be on a tangent through the interchange area.

Excluding right of way, Alternate 2 is expected to cost approximately \$4,800,000 more than the Selected Alternate, with the bulk of the increase attributable to Alternate 2's longer length and greater earthwork due to rougher terrain. Except for F33, the Owings-Myerly House, Alternate 2 would not require the acquisition of any land from the Archeological District.

Six residences would be displaced and Pindell School Road and existing MD 32 would be moved closer to four remaining residences.

Alternate 2 would displace Tiede Modular Erectors, an erection company based on the south side of Sanner Road west of Cedar Lane/Pindell School Road. In addition, Alternate 2 would require 3.78 acres of land from W.R. Grace and Company, of which 0.38 acre is used for parking.

Alternate 2 would require 5.8 acres of the Middle Patuxent Environmental Area and isolate an additional 14.8 acres, located between existing and Relocated Cedar Lane, from the remainder of the park.

With 5,950 linear feet of improvement on new location compared to 1300 feet for the Selected Alternate, Alternate 2 would have a substantially greater impact on the natural environment. A tabulation of the natural environmental impacts of the Selected Alternate and Alternate 2 is included in Table 1 in the Appendix.

As can be seen from a review of Table 1, although Alternate 2 would have slightly less floodplain and wetland impact than Alternate 1, it would impact 3.3 more acres of woodland, require 1400 more linear feet of stream relocation/encasement, and involve substantially more grading (as evidenced by the maximum depth of cut of 58 feet vs 20 feet for Alternate 1), thus increasing the potential for erosion and sedimentation.

As a result of the greater impact to the natural environment, residences, businesses, and the Middle Patuxent Environmental Area, as well as the additional cost, Alternate 2 is not considered to be a reasonable alternate.

iv. Alternate 3 - Western Partial Avoidance Alternate

As shown on Figure 5, this alternate would be identical to Alternate 2 from its southern terminus south of Sanner Road to a point approximately 600 feet north of MD 32, where the alignment would curve to the northeast and pass through the northwest corner of the Simpsonville Archeological District. The alignment would tie into the Howard County Cedar Lane improvements approximately 300 feet north of the Alternate 1 tie-in by curving in a more northerly direction and continuing along an extension of the tangent-alignment portion of the Howard County Cedar Lane improvements. South of the Cedar Lane/Corina Court intersection an at-grade intersection would be constructed to connect the bypassed portion of existing Cedar Lane and Guilford Road to relocated Cedar Lane, and the existing bridge over the Middle River Patuxent would be maintained to allow access to the residences immediately south of the bridge.

Relocated Cedar Lane would have a 40 mph design speed, with the maximum degree of horizontal curvature being 4°-30'. Through the interchange area, Relocated Cedar Lane would be primarily on a tangent.

Excluding right of way, Alternate 3 is expected to cost approximately \$3,500,000 more than the Selected Alternate, with the bulk of the increase attributable to Alternate 3's longer length and greater earthwork due to rougher terrain.

In addition to the displacement of F33, the Owings-Myerly House, Alternate 3 would require the acquisition of 2.36 acres of the Archeological District and directly affect one feature: F2 - Headrace. The Headrace is an abandoned channel that carried water from the dam to the mill. Impacts would consist of placing fill for the roadway embankment, and if this alternate were selected, mitigation would be effected through data recovery.

Alternate 3 would displace five residences and, as with Alternate 2, Pindell School Road and existing MD 32 would be moved closer to four remaining residences.

One business, Tiede Modular Erectors, would be displaced, and 3.30 acres of land would be acquired from W.R. Grace and Company, of which 0.15 acre is used for parking.

Alternate 3 would require 4.1 acres of the Middle Patuxent Environmental Area, and isolate an additional 7.4 acres from the remainder of the park.

With 5,000 linear feet of improvement on new location, compared to 1300 feet for the Selected Alternate, Alternate 3 would have a substantially greater impact on the natural environment. A review of Table 1 shows that although Alternate 3 would have slightly less wetland impact than Alternate 1, it would impact 5.3 more acres of woodland, require 950 more linear feet of stream relocation/encasement, and involve substantially more grading (as evidenced by the maximum depth of cut of 63 feet vs 20 feet for Alternate 1), thus increasing the potential for erosion and sedimentation.

As a result of the greater impact to the natural environment, residences, businesses, and the Middle Patuxent Environmental Area, as well as the additional cost, Alternate 2 is not considered to be a reasonable alternate.

v. **Alternate 4 - Eastern Partial Avoidance Alternate**

As shown on Figure 6, this alternate begins at the Pindell School Road/Sanner Road intersection and follows the Alternate 1 alignment for approximately 750 feet. The alignment would then diverge from Alternate 1 along a tangent towards the northeast and cross relocated MD 32 approximately 150 feet east of Alternate 1. The alignment would continue to the northeast to approximately 850 feet beyond relocated MD 32, at which point it would curve towards the north and, after crossing the Middle Patuxent River, would continue in a northerly direction passing between the floodplain area of the Archeological District to the west and the Owings Cemetery to the east. The alignment would tie into the Howard County Cedar Lane improvements approximately 450 feet north of the Alternate 1 tie-in by curving back towards the northeast. A new bridge spanning the Middle Patuxent River would also cross over Guilford Road. South of the Cedar Lane/Corina Court intersection, an at-grade intersection would be constructed to connect the bypassed portion of existing Cedar Lane and Guilford Road to relocated Cedar Lane. The existing bridge over the Middle Patuxent River would be removed and the North Service Road would be used to maintain access to the residences immediately south of the existing bridge.

Relocated Cedar Lane alignment would have a 40 mph design speed, with the maximum degree of horizontal curvature being 10°. Through the interchange area, Relocated Cedar Lane would be on a tangent. However, at the intersection with Relocated Mill Road, Relocated Cedar Lane would be on a relatively sharp 6° horizontal curve, which would extend northward to the 4.5% grade north of the river. This combination of a steep grade, sharp curvature and an intersecting road is a less than desirable situation due to the likelihood of high speeds on the downgrade. In addition, the sharp 10° curve on Relocated Cedar Lane at its tie-in to existing Cedar Lane at Corina Court is undesirable since high speeds are anticipated in this area due to existing Cedar Lane being on a 4.5% downgrade.

Excluding right of way, Alternate 4 is expected to cost approximately \$3,500,000 more than Alternate 1. Part of this differential is attributable to the wider bridge on eastbound MD 32 over the Middle Patuxent River under Alternate 4 needed to carry the outside lane of the ramp from Cedar Lane. (This lane will be dropped prior to the bridge under Alternate 1.)

In addition to the displacement of F33, the Owings-Myerly House, Alternate 4 would require the acquisition of 5.7 acres of the Archeological District and directly affect three features: F23 (wheelwright location), F30 (structural foundations) and F43 (sensitive area). Grading needed for construction of the North Service Road would affect these sites and mitigation would be provided through data recovery.

Alternate 4 would displace four residences. In addition, it would create a deep cut behind two residences on the east side of Cedar Lane south of the river, and move Relocated Cedar Lane closer to the residence adjacent to the Owings Cemetery on Corina Court.

Alternate 4 would not directly affect any businesses.

Alternate 4 would require 0.14 acre of the Middle Patuxent Environmental Area, needed for the construction of the North Service Road.

As with Alternates 2 and 3, Alternate 4 would have a greater impact than Alternate 1 on the natural environment due to its longer length on new location (4000 vs. 1300 linear feet). A review of Table 1 indicates that Alternate 4 would be similar to Alternate 1 in its impacts on wetlands and stream relocation/encasement. However, Alternate 4 would impact 2.6 more acres of woodland than Alternate 1, and involve substantially more grading, thus increasing the potential for erosion and sedimentation.

As a result of the greater impact to the natural environment and residences, the undesirable geometrics, and the additional cost, Alternate 4 is not considered to be a reasonable alternate.

c. Total 4(f) Avoidance Alternate

This alternate, which avoids both the Simpsonville Stone Ruins Archeological District and the Middle Patuxent Environmental Area, is a combination of the MD 32 Southern Shift and a modification of Cedar Lane Interchange Alternate 4.

As shown on Figure 6, the MD 32 mainline would curve to the southeast west of the W. R. Grace and Company gatehouse, cross existing MD 32 approximately 750' south of the existing MD 32/Cedar Lane intersection, and tie back into existing MD 32 east of the Middle Patuxent River, requiring replacement of the existing bridge over the river.

Cedar Lane would generally follow the Alternate 4 alignment previously described; however, south of existing MD 32 it would be located east of Alternate 4 in order to avoid the Owings - Myerly House. Cedar Lane would tie into the existing roadway at the Cedar Lane/Sanner Road/Pindell School Road intersection.

As can be seen on Figure 6, this alternate would not require any property from the Simpsonville Stone Ruins Archeological District. The Owings - Myerly House would remain in place, located between the ramp to westbound MD 32 (with a retaining wall to avoid disruption of the District) and the North Service Road. Cedar Lane would pass between the floodplain portion of the District and the Owings Cemetery to the east.

A comparison of the impacts of the Selected Alternate and the Total 4(f) Avoidance Alternate is as follows:

	<u>Selected Alternate</u>	<u>Total 4(f) Avoidance Alternate</u>
Wetlands (acre)	0.56	0.96
Stream Reloc./ Encasement (linear feet)	0	1,560
Woodland (acre)	9.4	11.6
Displacements		
Residential	1	5
Business	0	1

In addition to the above, the following factors must be considered in evaluating these alternates:

- Excluding right of way, the Total 4(f) Avoidance Alternate is estimated to cost approximately \$10,000,000 more than the Selected Alternate. Including the right of way cost would increase the differential.
- Under the Selected Alternate, Cedar Lane will be on a tangent north of MD 32, whereas it would have two sharp horizontal curves under the Total 4(f) Avoidance Alternate. While both alternates satisfy minimum design criteria, the horizontal curves are undesirable because with the relatively steep (4.5 %) grade on Cedar Lane in this area, motorists going southbound (downgrade) will tend to operate at fairly high speeds. This is reflected in the current high accident rate on Cedar Lane in this area.
- The Total 4(f) Avoidance Alternate would have a greater impact on the natural environment than will the Selected Alternate. This is primarily attributable to the longer length of roadway on new alignment with the Total 4(f) Avoidance Alternate (9,000 linear feet vs. 4,000 linear feet for the Selected Alternate.)

As a result of the greater impact to the natural environment and residences, the undesirable geometrics on Cedar Lane, and the additional cost, the Total 4(f) Avoidance Alternate is not considered to be a reasonable alternate.



LEGEND	
PROPOSED ROADWAY	
WETLANDS	
100 YEAR FLOODPLAIN	
ARCHEOLOGICAL DISTRICT BOUNDARY	
ARCHEOLOGICAL FEATURE	F1
MIDDLE PATUXENT ENVIRONMENTAL AREA	
RELOCATIONS	
R=RESIDENCE	
B=BUSINESS	
YEAR 2015 AVERAGE DAILY TRAFFIC	17,200

MD 32/CEDAR LANE INTERCHANGE

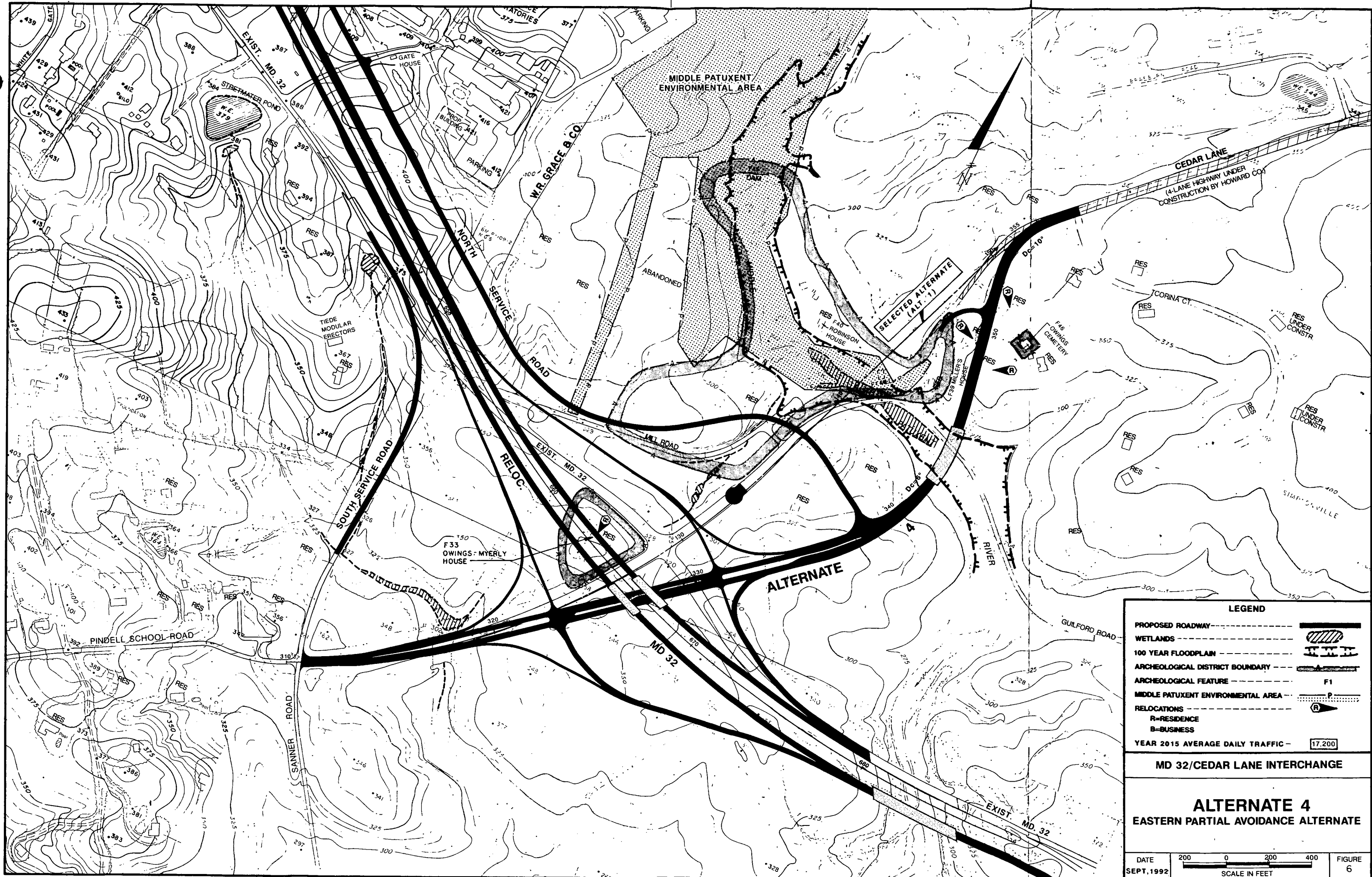
ALTERNATE 2
WESTERN TOTAL AVOIDANCE ALTERNATE



LEGEND	
PROPOSED ROADWAY	
WETLANDS	
100 YEAR FLOODPLAIN	
ARCHAEOLOGICAL DISTRICT BOUNDARY	
ARCHAEOLOGICAL FEATURE	F1
MIDDLE PATUXENT ENVIRONMENTAL AREA	
RELOCATIONS	
R-RESIDENCE	
B-BUSINESS	
YEAR 2015 AVERAGE DAILY TRAFFIC	17,200

MD 32/CEDAR LANE INTERCHANGE

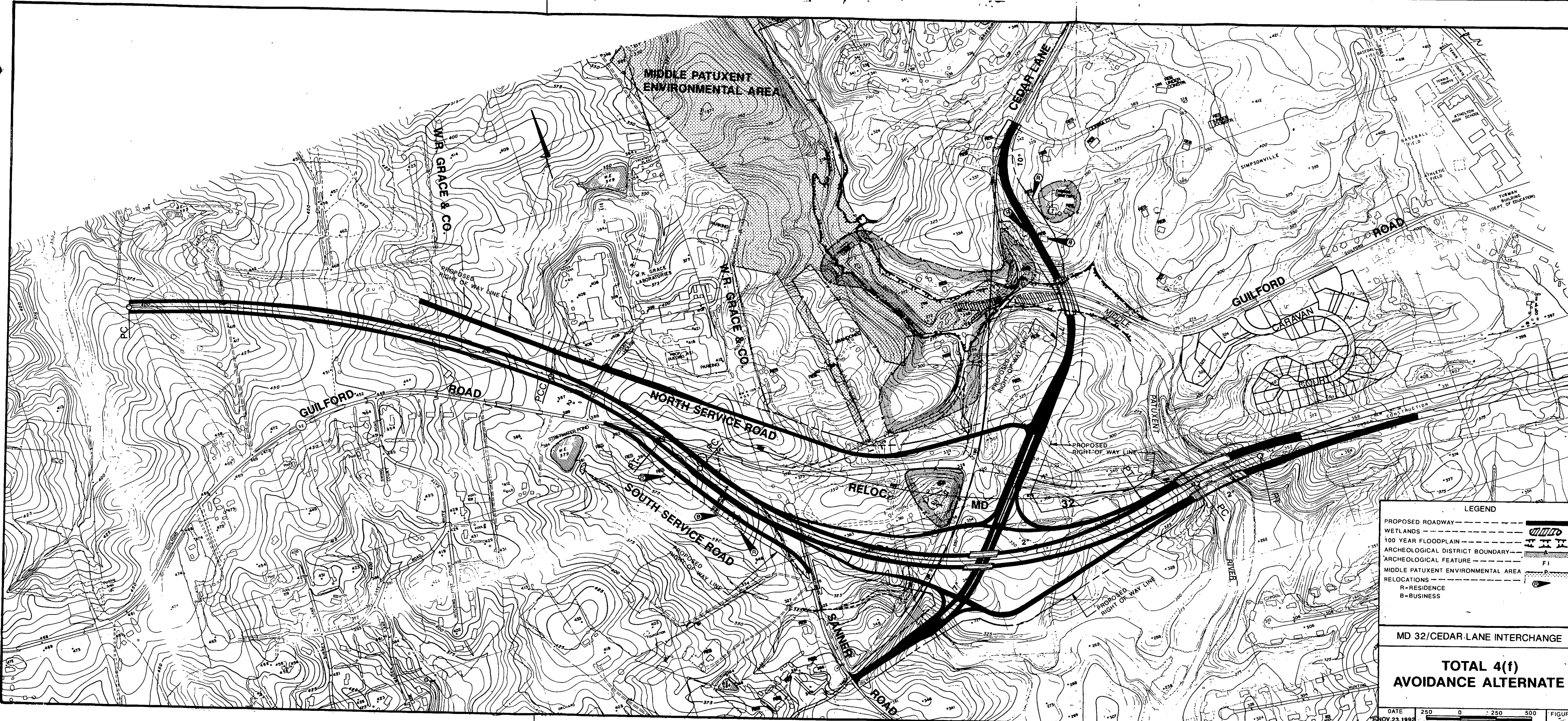
ALTERNATE 3 WESTERN PARTIAL AVOIDANCE ALTERNATE



LEGEND	
PROPOSED ROADWAY	
WETLANDS	
100 YEAR FLOODPLAIN	
ARCHEOLOGICAL DISTRICT BOUNDARY	
ARCHEOLOGICAL FEATURE	F1
MIDDLE PATUXENT ENVIRONMENTAL AREA	
RELOCATIONS	
R-RESIDENCE	
B-BUSINESS	
YEAR 2015 AVERAGE DAILY TRAFFIC	17,200

MD 32/CEDAR LANE INTERCHANGE

ALTERNATE 4
EASTERN PARTIAL AVOIDANCE ALTERNATE



LEGEND

- PROPOSED ROADWAY
- WETLANDS
- 100 YEAR FLOODPLAIN
- ARCHEOLOGICAL DISTRICT BOUNDARY
- ARCHEOLOGICAL FEATURE
- MIDDLE PATUXENT ENVIRONMENTAL AREA
- RELOCATIONS
 - R=RESIDENCE
 - B=BUSINESS

MD 32/CEDAR LANE INTERCHANGE

**TOTAL 4(f)
AVOIDANCE ALTERNATE**

DATE NOV. 23, 1992

SCALE IN FEET

FIGURE 7

6. Mitigation

A Memorandum of Agreement (MOA) between the Advisory Council on Historic Preservation, the Federal Highway Administration, the Maryland State Historic Preservation Officer and the Maryland State Highway Administration has been prepared that sets forth the measures that will be taken to minimize and mitigate the impacts of the project on the Simpsonville Stone Ruins Archeological District. The principal measures set forth in the MOA, a copy of which is included in the Appendix of this report, are as follows:

a. Data Recovery/Public Information

A Salvage/Mitigation (Phase III) archeological analysis will be undertaken for the impacted archeological features and recordation of the historic standing structures within the District will be completed. A plan to interpret the results of the archeological and historic architectural research to the general public will be prepared and implemented.

b. Auxiliary Measures With SHA Right of Way

- Fencing will be provided during construction to protect the parts of the Archeological District within the right of way but not directly affected by construction.
- Permanent fencing will be provided around F1: Mill at the end of construction.
- The site will be monitored during the construction period by SHA archeologists.

c. Auxiliary Measures Outside SHA Right of Way

- Property owners within the Archeological District will be informed of the significant components of the District on their properties and encouraged to donate perpetual historic preservation easements.
- The SHA will cooperate with the Howard County Department of Recreation and Parks, which has preliminary agreed to make the Archeological District an integral part of the Middle Patuxent Environmental Area's interpretation program and to preserve and protect those portions of the archeological site on County owned land.
- The contractor will be prohibited from using any portion of the Archeological District outside the right of way.

d. Management Recommendations

- The SHA will prepare long-term management recommendations for the Archeological District.

Mitigation of the impact of the project on the Middle Patuxent Environmental Area was addressed in the Supplemental Final Environmental Impact Statement/Section 4(f) Statement (SFEIS-p. IV-26), which was approved in May, 1989. Mitigation will consist of providing replacement land contiguous to the existing Environmental Area. As stated in a letter from Jeffrey Bourne to Louis Ege dated June 24, 1992 (see p. 69 in Appendix), Howard County supports both the Selected Alternate and the proposed mitigation. It should be noted that although only 0.14 acre of land will be required from the Environmental Area, 0.24 acre of replacement land will be provided. This larger amount of replacement land was agreed upon following the preparation of the above-referenced June 24, 1992 letter, which calls for only 0.138 acre of replacement land.

7. Concluding Statement

Based upon the information presented in this 4(f) Evaluation, it has been determined that there is no feasible and prudent alternative to the use of approximately 8.72 acres of land from the 27.25 acre Simpsonville Archeological District. The Selected Alternate includes all possible planning to minimize harm to the Archeological District resulting from this use.

8. Coordination

This project has been coordinated with the State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP), and a Memorandum of Agreement involving the FHWA, SHA, SHPO and ACHP has been prepared. The MOA is included in the Coordination Section of the Appendix. The Public Notice for the Combined Location/Design Public Hearing mentioned the presence of historic sites in the study area. The presence of archeological sites which required further investigation to determine their eligibility for the National Register of Historic Places was discussed at the Public Hearing, held on March 29, 1988.

The project has also been coordinated with Howard County. As set forth in the correspondence in the Appendix, the County supports the SHA's selected alignment for MD 32 and Selected Alternate (Alternate 1) for the Cedar Lane Interchange.

The Draft Supplemental 4(f) Evaluation was distributed on June 19, 1992, (See Appendix for distribution list.) The U.S. Department of the Interior was the only agency having comments. The comments and responses thereto are included in the Appendix.

APPENDIX

43.

TABLE 1
SUMMARY OF IMPACTS

	<u>Alternate 1</u> <u>(Selected Alt.)</u>	<u>Alternate 2</u> <u>(Western Total</u> <u>Avoid. Alt.)</u>	<u>Alternate 3</u> <u>(Western Partial</u> <u>Avoid. Alt.)</u>	<u>Alternate 4</u> <u>(Eastern Partial</u> <u>Avoid. Alt.)</u>
Relocated Cedar Lane:				
Design Speed (mph)	40	40	40	40
Length of improvement (ft.)	4,150	5,950	5,000	4,750
Length on new location (ft.)	1,300	5,950	5,000	4,000
Maximum depth of cut (ft.)	20	58	63	30
Archeological District¹:				
No. of features Disturbed	9	0	1	3
Area (acres)	8.72	0 ²	2.36	5.70
Floodplain (Ac.) ⁵	0.40	0.12	0.20	0.23
Wetlands (Ac.) ⁵	0.56	0.53	0.53	0.55
Stream Reloc/Encasement (Linear Feet)	0	1400	950	50
Woodland (Ac.)	9.4	12.7	14.7	12.0
Park Property (Ac.)				
Area Required	1.91	5.81	4.09	0.14
Area Isolated from Remainder of Park	0	14.8	7.4	0
Displacements:				
Residence	1	6	5	4
Business	0	1	1	0
W.R. Grace & Co. Property:				
Area Required (acres) ³	0	3.78	3.30	0
Parking (acres) ⁴	0	0.38	0.15	0
Construction Cost ⁶	\$8,400,000	\$13,200,000	\$11,900,000	\$11,900,000

NOTES:

General - Impacts of Alternate 1, Selected Alternate, are based on the limits of the proposed right-of-way as determined from final design plans and detailed field studies of the environmental features. The impacts of Alternates 2, 3 and 4 are based on limits of proposed right-of-way estimated from cursory cross-section investigations and approximations using the Alternate 1 right-of-way widths, and delineation of environmental features based upon best available information. For example, wetland impacts for Alternates 2, 3 and 4 are based upon a review of National Wetland Inventory Maps, aerial photographs, and topographic mapping, whereas for Alternate 1 they are based upon field investigations. It is expected that detailed analyses would not substantially change the impacts.

Table 1 Footnotes

- 1 The indicated acreage and number of features do not include the Owings-Myerly House and associated 3+ acres impacted by the relocated MD 32 mainline and affected by all Cedar Lane alignment alternates.
- 2 Retaining wall may be required along interchange westbound exit ramp to avoid impact to the Archeological District.
- 3 The indicated acreage is that needed in addition to the acreage to be acquired for the relocated MD 32 mainline and North Service Road construction as designed for the Selected Alternate.
- 4 The indicated area is based on parking shown as existing or proposed on the Comprehensive Sketch Plan for the W.R. Grace and Co. property, last revised May 18, 1990.
- 5 Floodplain and wetland acreages do not include the area beneath the bridge over the Middle Patuxent River that will not be filled.
- 6 Construction costs are for Relocated Cedar Lane only and do not include the cost of any portion of the MD 32 mainline or the interchange ramps, unless otherwise noted.

TABLE 2

ARCHAEOLOGIC FEATURES WITHIN PROPOSED RIGHT OF WAY

Alternate 1 (Selected Alternate)

- F 1: Mill*
- F 2: Headrace
- F 3: Structural foundation*
- F 4: General store
- F 9: Concrete floodgate
- F 11: Possible sawmill
- F 12: Waste race
- F 13: Pre-1949 road alignment
- F 17: Structural foundation*
- F 18: Mill path
- F 22: Concrete lined pit (Part of F1)
- F 23: Wheelwright location
- F 25: Magnetic anomaly*
- F 28: Blacksmith location
- F 30: Structural foundations*
- F 31: Possible Pavement (Part of F25)
- F 32: Possible trench (Part of F25)
- F 35: Wheelpit*
- F 36: Wheelpit dam*
- F 47: Tailrace

Alternate 2

None

Alternate 3

F 2: Headrace

Alternate 4

- F 23: Wheelwright location*
- F 30: Structural foundations
- F 43: Sensitive Area

* Considered to be the most archaeologically significant features based on their potential to provide important information.

NOTE: F33: Owings-Myerly House will be impacted by the MD 32 mainline and is not included in the above impacts.



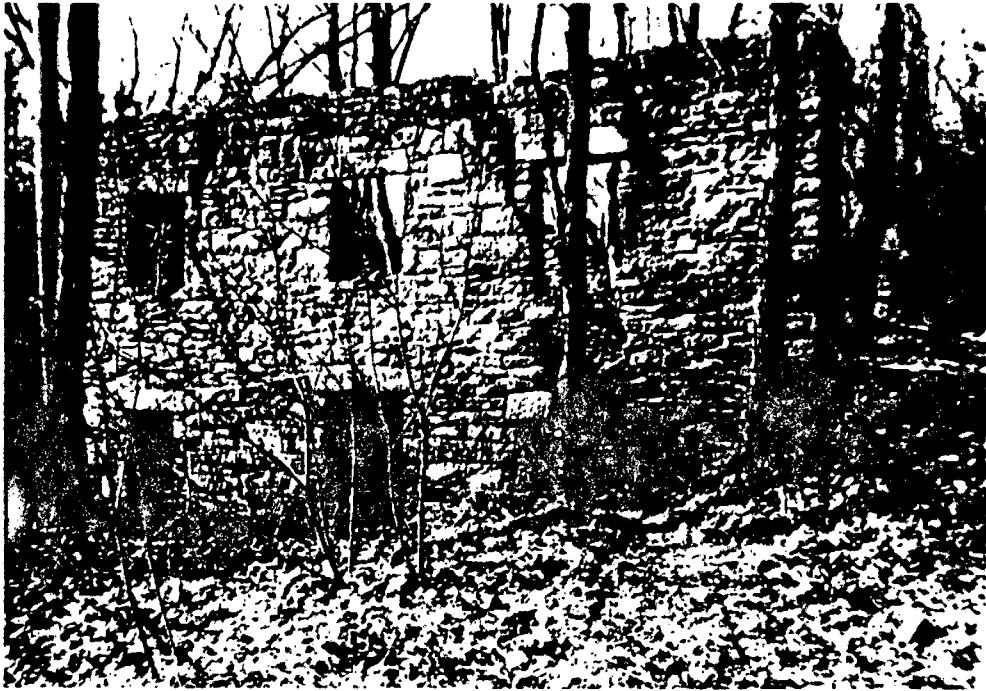
Photograph 7: View Inside Mill (F1). Note Large Trees in Center



Photograph 8: View of Mill in Snow, December 1989



Photograph 15: View of Northwest Corner of Mill in 1989

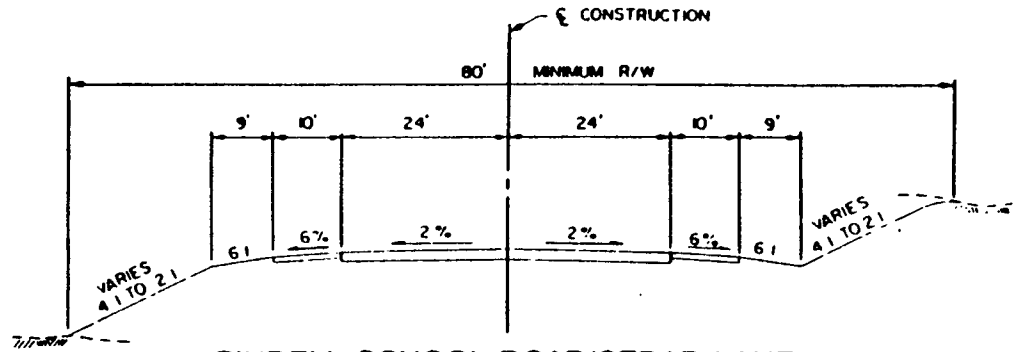


Photograph 21: South Wall of Mill. Circa 1984 (Courtesy of Lee Preston)

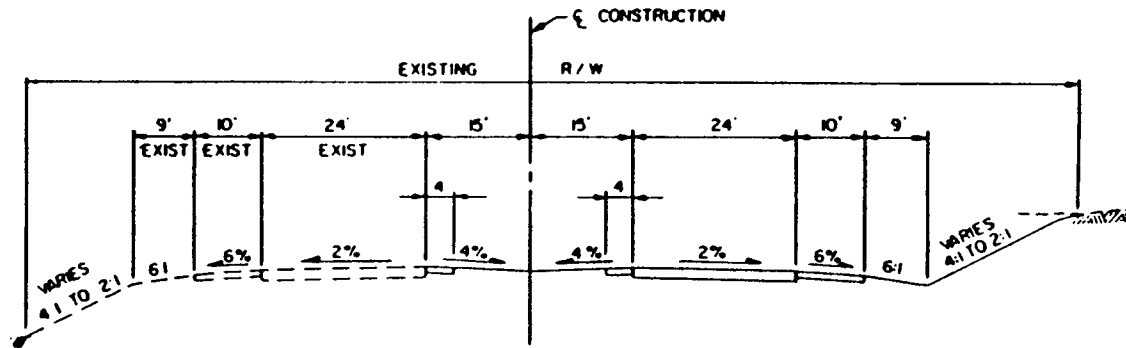


Photograph 22: South Wall of Mill in 1989

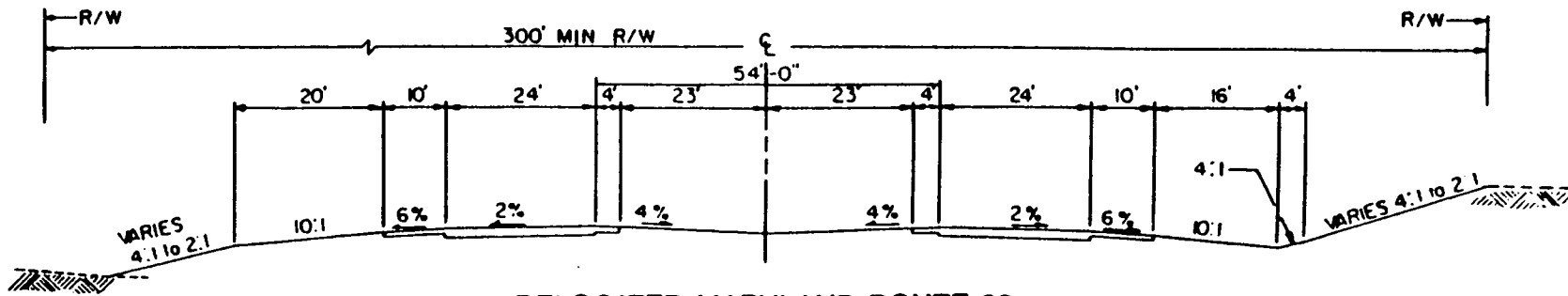
TYPICAL SECTIONS



PINDELL SCHOOL ROAD/CEDAR LANE
BEYOND INTERCHANGE AREA



PINDELL SCHOOL ROAD/CEDAR LANE
THROUGH INTERCHANGE AREA



RELOCATED MARYLAND ROUTE 32

Note:

The dimensions shown are for the purpose of determining cost estimates and environmental impact and are subject to change during the final design phase

FIGURE 8

Note: These typical sections are common for all Build Alternates (A, B & C) and all Options (1-3)

ALTERNATES A, B AND C

ARCHEOLOGICAL FEATURES

- | | |
|-------------------------------|--------------------------------------|
| F1: MILL* | F24: POSSIBLE ROCK QUARRY |
| F2: HEADRACE | F25: MAGNETIC ANOMALY * |
| F3: STRUCTURAL FOUNDATION * | F26: PART OF F6b |
| F4: GENERAL STORE | F27: PART OF F6b |
| F5: POSSIBLE EARTHEN TERRACE | F28: BLACKSMITH LOCATION |
| F6a: BURIED ALIGNMENT * | F29: POSSIBLE FILL FOR F13 |
| F6b: FEATURE COMPLEX * | F30: STRUCTURAL FOUNDATIONS * |
| F6c: SOUTHERN FOUNDATION * | F31: POSSIBLE PAVEMENT (Part of F25) |
| F7: STRUCTURAL FOUNDATION | F32: POSSIBLE TRENCH (Part of F25) |
| F8: TERRACED PLATFORM AREA | F33: OWINGS-MYERLY HOUSE |
| F9: CONCRETE FLOODGATE | F34: WASTE RACE |
| F10: BRIDGE ABUTMENTS/PIERS * | F35: WHEELPIT * |
| F11: POSSIBLE SAWMILL | F36: WHEELPIT DAM * |
| F12: WASTE RACE | F37: POSSIBLE ROCK QUARRY |
| F13: PRE-1949 ROAD ALIGNMENT | F38: CONCRETE STEPS |
| F14: WATER GATE * | F39: MILLER'S HOUSE |
| F15: MAIN DAM * | F40: ROBINSON HOUSE |
| F16: STRUCTURAL FOUNDATION * | F41: SENSITIVE AREA |
| F17: STRUCTURAL FOUNDATION * | F42: TENANT CABIN LOCATION |
| F18: MILL PATH | F43: SENSITIVE AREA |
| F19: POSSIBLE WATERGATE | F44: OYSTER MIDDEN (Part of F6b) |
| F20: ASH LAYER (Part of F45) | F45: SENSITIVE AREA |
| F21: PART OF F6b | F46: OWINGS CEMETERY |
| F22: CONCRETE LINED PIT | F47: TAILRACE |
| F23: WHEELWRIGHT LOCATION | |

* CONSIDERED TO BE THE MOST ARCHEOLOGICALLY SIGNIFICANT FEATURES BASED ON THEIR POTENTIAL TO PROVIDE IMPORTANT INFORMATION

LEGEND

PROPOSED RIGHT OF WAY FOR ALT. 1 (SELECTED ALTERNATE)

ARCHEOLOGICAL DISTRICT BOUNDARY

ARCHEOLOGICAL FEATURE



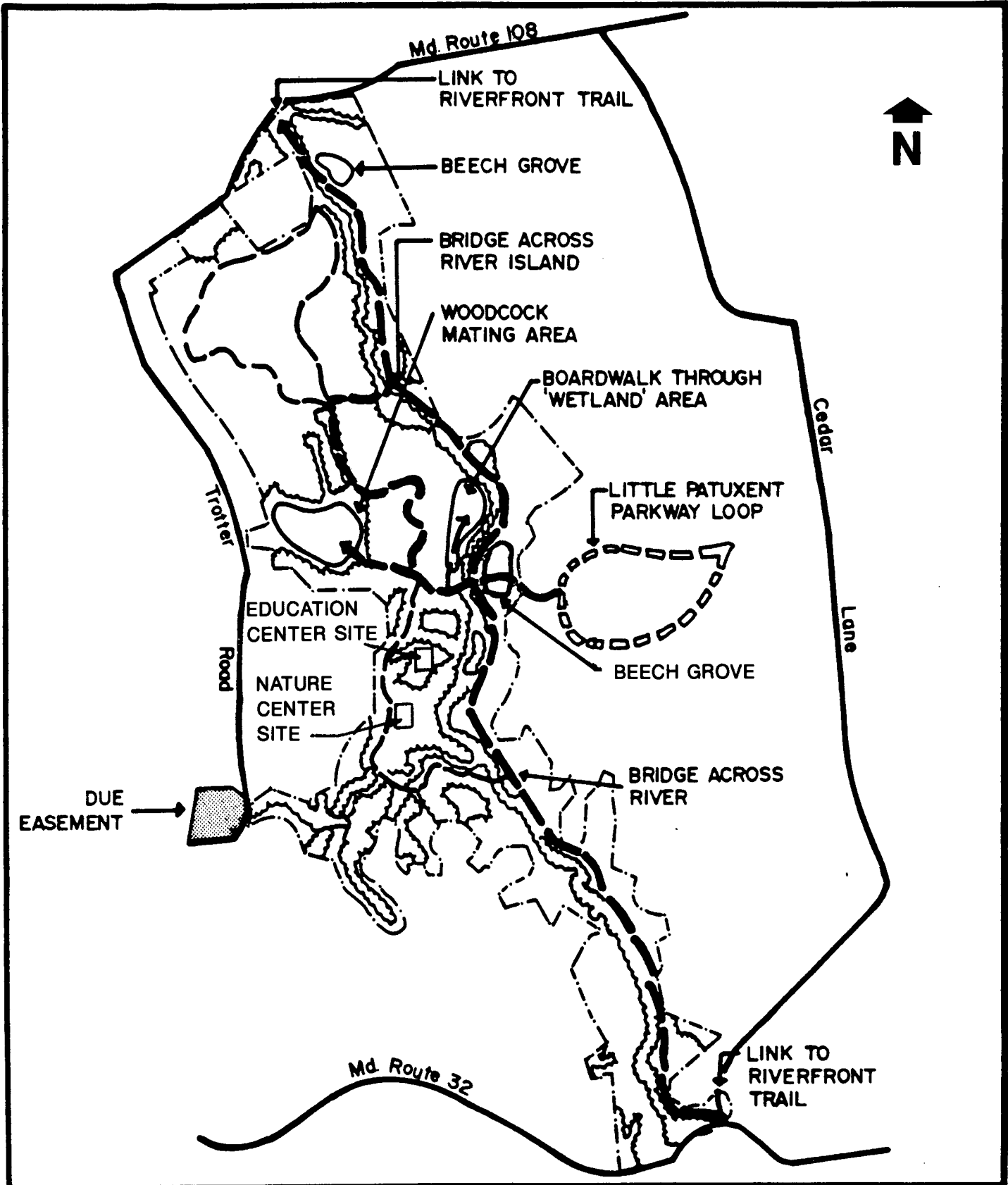
MD. 32/CEDAR LANE INTERCHANGE

SIMPSONVILLE STONE RUINS ARCHEOLOGICAL DISTRICT

DATE: SEPT. 1992

SCALE IN FEET: 0 100 100

FIGURE 9



Md. Route 108

LINK TO RIVERFRONT TRAIL

BEECH GROVE

BRIDGE ACROSS RIVER ISLAND

WOODCOCK MATING AREA

BOARDWALK THROUGH 'WETLAND' AREA

LITTLE PATUXENT PARKWAY LOOP

Trotter Road

EDUCATION CENTER SITE

NATURE CENTER SITE

BEECH GROVE

Cedar Lane




Lane

DUE EASEMENT

BRIDGE ACROSS RIVER

Md. Route 32

LINK TO RIVERFRONT TRAIL

-  Primary Trail
-  Secondary Trail
-  Limit of Wooded Area

MD 32 / CEDAR LANE INTERCHANGE

MIDDLE PATUXENT ENVIRONMENTAL AREA

PRELIMINARY CONCEPT I

NOT TO SCALE

FIGURE 10

PUBLIC NOTICE

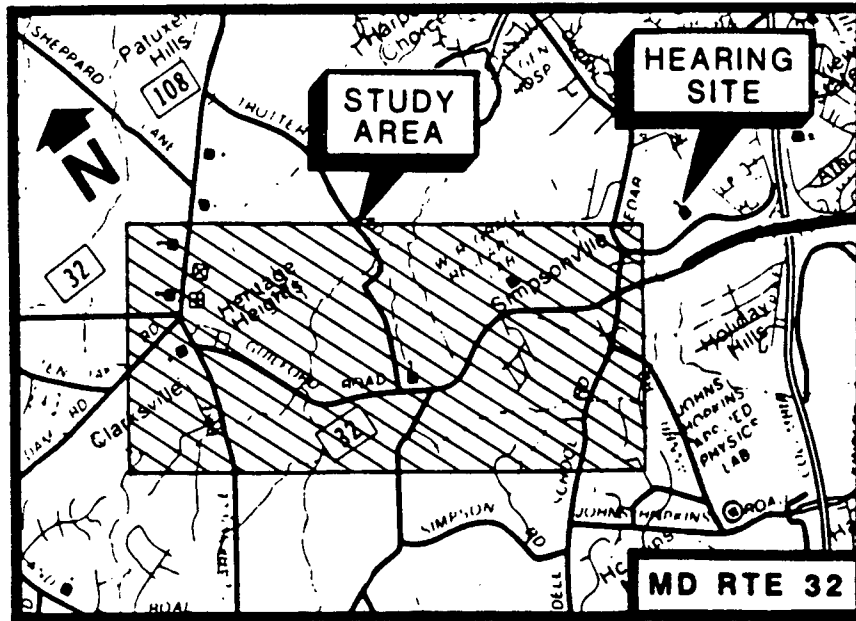
MARYLAND DEPARTMENT OF TRANSPORTATION
STATE HIGHWAY ADMINISTRATION

WILL CONDUCT A

LOCATION/DESIGN PUBLIC HEARING

Tuesday, March 29, 1988
7:30 p.m.
Atholton High School
6520 Freetown Road
Columbia, Maryland 21044

MARYLAND ROUTE 32



Beginning at 6:30 p.m., wall displays and maps depicting the project alternate will be available for review. Representatives of the State Highway Administration will be available to discuss the project with interested persons.

This project proposes the extension of Maryland Route 32 on new location from Maryland Route 108 to Pindell School Road, a distance of approximately 3 miles.

The State Highway Administration, in cooperation with the Maryland Historical Trust, has identified 2 historic sites in the study area that are currently on or are considered eligible for the National Register of Historic Places. These sites are identified in the environmental document prepared for the project. In accordance with the Section 106 procedures of the National Historic Preservation Act, the potential impact, if any, and preliminary determination of effect will be presented for each site. This public hearing will provide the opportunity for input from the public in accordance with Section 106 public involvement procedures.

If requested in writing, you might be eligible to receive additional information which may be developed during the course of consultation with the Advisory Council and/or Maryland Historical Trust.

The Location/Design Hearing will consist of a formal presentation of approximately 30 minutes, beginning at 7:30 p.m., which will include a description of the project, an environmental summary, information on right-of-way acquisition, relocation assistance policies and procedures, and Title VI of the Equal Opportunity Program.

Individuals and representatives of organizations who desire to speak at the hearing or wish to be placed on the project mailing list should submit their names and affiliations to Mr. Neil J. Pedersen, Director, Office of Planning and Preliminary Engineering, State Highway Administration, Post Office Box 717, Baltimore, Maryland 21203-0717. If you received a copy of this notice, you are currently enrolled on the project mailing list. Requests to speak should be received no later than March 22, 1988 in order to ensure proper scheduling of the meeting. Attendees at the hearing who desire to speak may do so following those on the previously established list. If a large number of speakers enroll, a limitation on the amount of time allotted to each speaker may be necessary. Brochures and forms for written comments will be available at this hearing.

Written statements and other exhibits in lieu of or in addition to oral presentation at the hearing may be submitted to Mr. Pedersen at the above address until April 8, 1988, in order to be included in the "Public Hearing Transcript".

Beginning on February 26, 1988, the "Draft Environmental Impact Statement" will be available for inspection and copying, Monday through Friday, at the following locations:

State Highway Administration
Library - Room 415
707 North Calvert Street
Baltimore, Maryland 21202

Howard County Public Library
10375 Little Patuxent Parkway
Columbia, Maryland

District #7 Office
5111 Buckeystown Pike
Frederick, Maryland

Howard County Offices
Office of Planning and Zoning
Ellicott City, Maryland

HEARING IMPAIRED: If anyone with a hearing impairment desires to attend this meeting, please notify Mr. Neil J. Pedersen at the above address in writing or by telephone at 1-800-492-5626 (Statewide Toll Free) to be received no later than five days preceding this hearing, defining whether an oral or sign language interpreter is needed. To the extent this is feasible and possible, an interpreter will be procured.

February 16, 1988

Hal Kassoff
State Highway Administrator

MARYLAND
HISTORICAL



TRUST

PROJECT
DEVELOPMENT
DIVISION

William Donald Schaefer
Governor

Jacqueline H. Rogers
Secretary, DHCD

JUN 24 12 54 PM '88

June 17, 1988

Mr. Louis H. Ege, Jr.
Deputy Director
Project Development Division
State Highway Administration
Maryland Department of Transportation
P. O. Box 717
707 North Calvert Street
Baltimore, Maryland 21203-0717

RE: Phase I Archeological Reconnaissance
Maryland Route 32 from Maryland Route
108 to Pendell School Road
Contract No. H292-202-770
P.D.M.S. No. 132059
Howard County, Maryland

Dear Mr. Ege:

Thank you for sending us a copy of the executive summary of the Phase I archeological reconnaissance conducted of the above-referenced project. The survey identified three archeological sites, 18HO80, 18HO148 and 18HO149. Two of these sites, 18HO80 and 18HO149 would be affected by construction of any of the three alternate routes. Site 18HO148 would be affected by construction of the southernmost alternate, designated alternate 4. In order for this office to complete its review of the project and concur with the presented recommendations, we require more detailed information concerning the Phase I survey methodology and results. Below we have outlined those issues which warrant clarification:

- 1) A map depicting the boundaries of 18HO80,, described on page 1 as the Simpsonville town site and on page 6 as the Simpsonville Stone Ruins, is provided in Figure 2. The executive summary recommends that the routes of Cedar Lane and Guilford Avenue be redesigned to avoid the site boundaries as shown on Figure 2 and, if this is not possible, that additional archeological work be performed to determine the National Register eligibility of 18HO80.

Maryland

Department of Housing and Community Development
Shaw House, 21 State Circle, Annapolis, Maryland 21401 (301) 974-4450, 757-9000
Temporary Address: Arnold Village Profit VII-109 Ritchie Highway, Arnold, Maryland 21012

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Mr. Louis H. Ege, Jr.
June 16, 1988
Page 2

On the basis of the information offered in the executive summary, we are unable to make recommendations concerning avoidance and/or mitigation at site 18H080 at this time. Given the limited extent of subsurface testing (5 shovel tests) and the limited background research conducted, we do not consider that the boundaries of Site 18H080 have been adequately defined. We note that the Maryland Structures Inventory lists an historic structure within the project area and outside the boundaries shown on Figure 2 diagonally across the intersection of Route 32 and Cedar Lane, H0525, the Hatfield residence (See attached map and inventory form). According to the inventory form, the field stone foundation of this structure may date to the mid 18th century when the building was associated with the grist mill in the vicinity. While this office has determined that the historic structure H0525 is not eligible for inclusion on the National Register, the historic archeological resources dating from the mid 18th century associated with this structure are potentially eligible for the National Register on the basis of the information which they may contain concerning the historic settlement of Simpsonville.

In addition, the 1860 Martenet map of Howard County shows numerous structures located on both sides of what is now Route 32 (See attached map). This office recommends additional Phase I testing of Area 17. The level of work should be sufficient to locate and identify the additional historic sites predicted to exist on the basis of cartographic evidence and to provide a preliminary assessment of their eligibility for inclusion on the National Register. Additional background research is also recommended to provide an assessment of the area's potential to contain archeological resources dating to the 18th and early 19th centuries.

- 2) South and east of Area 17, an historic structure listed on the Maryland State Inventory, H0165, the Owings-Myerly House or the Vogel House, is located within the project area. (See attached map and form) This structure appears on the 1860 Martenet as the May H. A. Owings residence and on the 1878 Hopkins as the John J. Myerly residence. While this office has determined that the historic structure itself is not eligible for the National Register, the archeological resources associated with the property are potentially eligible under both criteria B and D. According to the inventory form, the land is associated with the Owings family, a family prominent in Howard County history. The older portion of the house is believed to have been built prior to 1850. We recommend that phase 1 testing be conducted in the vicinity of the Vogel House to locate and identify the predicted subsurface cultural levels and features, determine the site's boundaries, stratigraphy, evidence of disturbance and information potential.

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- 3) Areas 8 and 9 were not tested because access was denied. Please clarify why these areas and other hilltops were initially selected for testing, if as indicated on pages 3 and 4, their elevation and distance from the Middle Patuxent River is typical of locations with a low potential for significant prehistoric resources. Further, we note that area 8 is located in the vicinity of an historic structure listed on the Maryland inventory, HO164, Clifton/Wellings Stone House. This historic structure is located on a tract of land patented in 1712 called "White Wine and Claret." The house itself is believed to have been built c. 1818 and has been determined to be eligible for the National Register. Given the structure's proximity to the proposed right of way, it is possible that archeological resources dating to the 18th and early 19th century use and occupation of the property are located within the project area. For the above reasons, this office recommends that a Phase I survey be conducted of both areas 8 and 9 in conjunction with additional background research to evaluate the potential for 18th and early 19th archeological resources associated with the historic tract "White Wine and Claret."
 - 4) Another historic structure listed on the Maryland Inventory and determined to be eligible for the National Register and located in close proximity to the project area is HO158, River Hill Farm. This structure appears on the 1860 Martenet as the residence of Mary H. W. Owings and on the 1878 Hopkins as the residence of Richard B. Owings. The property was part of a 500 acre tract called Four Brothers Portion. The main body of the house dates before 1840. The inventory form mentions a well, smokehouse and tenant house associated with the farm. Since the historic access road to the farm lies within the project area, we recommend that a phase 1 survey be conducted of the project area south of HO158 in conjunction with site specific background research to investigate the potential for historic archeological resources associated with the 19th century use and occupation of the property.
 - 5) We recommend that the 1860 Martenet Map and 1878 Hopkins Atlas of Howard County be studied with greater care to locate areas with high potential for the presence of historic archeological resources. Also, it should be noted that this section of Howard County has been occupied since the 18th century and that the later 19th century atlases underrepresent the archeological resources of the 18th and early 19th centuries. Secondary histories of the area and persons knowledgeable in local history, such as Mr. Lee Preston, President of the Upper Patuxent Archeology Group (301-465-7545) and Mr. Ed Shull of the Howard County Department of Recreation and Parks (301) 992-2480 can provide helpful guidance along these lines.

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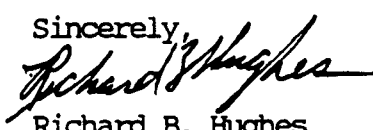
Mr. Louis H. Ege, Jr.
June 16, 1988
Page 4

- 6) Finally, test areas 7, 10, 11, 14, 15, and 16 are described as having 20% visibility or less. Pedestrian survey yielded no cultural material. No subsurface testing was performed. If lack of habitable terrain is considered to indicate a low potential for prehistoric resources, then justification for the initial selection of areas 7 and 10 should be provided. This office strongly questions whether surface examination alone was sufficient survey coverage of these areas. A clearer discussion of the process of selecting areas for testing and of the testing methodology is needed in the executive summary.

Once the additional requested information has been provided, this office will be able to make an informed review of the project with appropriate recommendations. If you have any questions concerning these comments or require further assistance, please do not hesitate to contact Dr. Ethel R. Eaton of my staff at (301) 757-9000.

We look forward to receiving a copy of the final survey report when it is available.

Thank you for your cooperation and assistance.

Sincerely,

 Richard B. Hughes
 Chief Administrator
 Archeological Programs

REH/ERE/mmc
 enclosures
 cc: Ms. Cynthia Simpson
 Ms. Rita Suffness
 Mr. Tyler Bastian
 Mrs. Mary Louise Gramkow
 Mr. Ed Shull
 Dr. Ira Beckerman
 Mr. J. Rodney Little

**MARYLAND
HISTORICAL**



TRUST

PROJECT
DEVELOPMENT
OFFICE

JUN 19 1990

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William Donald Schaefer
Governor

Jacqueline H. Rogers
Secretary, DHCD

June 7, 1990

Mr. Louis H. Ege, Jr.
Deputy Director
Office of Planning and Preliminary
Engineering, State Highway Administration
Maryland Department of Transportation
707 North Calvert Street
Baltimore, Maryland 21203-0717

Re: Phase II Archeological
Investigations at the
Simpsonville Stone Ruins
(18H080) and the Heritage
Heights Site (18H0149),
Howard County, Maryland
Contract No. HO 292-202-770

Dear Mr. Ege:

Thank you for sending us the two volumes of the above-referenced draft report for our review. The report was prepared by GAI Consultants, Inc.

The document presents detailed documentation of the testing goals, methods, and results. The report is well written, contains clear illustrations, and meets the standards outlined in the "Guidelines for Archeological Investigations in Maryland" (McNamara 1981). Utilization of the magnetometer survey and computer-generated illustrations was very innovative. Furthermore, we appreciated the attention paid to incorporating the historic contexts and themes of the Maryland Comprehensive Historic Preservation Plan (Weissman 1986) into the text.

The investigations addressed the tasks within the Scope of Services (Appendix I); however, restrictions in the work plan for the Heritage Heights site (18H0149) prevented a definitive determination of National Register eligibility for this resource. Phase II shovel testing and unit excavation at 18H0149 verified the presence of a stone foundation and produced evidence that a brick feature probably represented the structure's chimney. Diagnostic artifacts in direct association with the foundation indicated twentieth century dates and ties to the building's dismantling and/or abandonment. Late nineteenth century artifacts were encountered with later specimens in contexts farther from the foundation, but the testing of a trash pit (Feature 3) yielded only twentieth century items without stratification.

Maryland

Department of Housing and Community Development
Shaw House, 21 State Circle, Annapolis, Maryland 21401 (301) 974-5000

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Mr. Louis H. Ege, Jr.
Deputy Director
June 7, 1990
Page 2

In addition to the historic artifacts of 18H0149, Phase II work revealed a much more extensive prehistoric component than had been identified during Phase I. The prehistoric artifacts, including Early and Middle Archaic projectile points, were frequently mixed with the historic deposits; however, several shovel test pits revealed apparently intact prehistoric strata. We concur that 18H0149 has the potential to contain undisturbed prehistoric deposits, and we agree that additional Phase II testing is necessary in order to interpret this prehistoric component in more detail prior to determining the site's eligibility for the National Register of Historic Places. Complete Phase II evaluation of the prehistoric component was not possible with the available Scope of Services, which called for more attention to historic features.

The recommended supplementary Phase II investigations at the Heritage Heights site should include the excavation of a sufficient number of units (at least 1 m square in size) to determine: a) horizontal and vertical extent of the prehistoric component; b) cultural affiliation, function, and significance; c) integrity; and d) reasons for recommending eligibility or non-eligibility for the National Register. Since the already completed investigations at 18H0149 found relatively little diagnostic and undisturbed material that dated the historic foundation to the nineteenth century, we believe that further testing of the structure is not likely to yield more significant data relating to a possible occupation by the prominent Warfield family. Therefore, the additional Phase II work should concentrate on the prehistoric deposits. Of course, any newly discovered historic information still should be reported. Given the large size of the current Phase II document, we recommend that the results of the extra Phase II work at 18H0149 be submitted to us in draft form as a separate addendum. Upon our review of the addendum, its contents can be incorporated into the final report on Phase II investigations at both 18H0149 and 18H080.

The current Phase II studies of the Simpsonville Stone Ruins (18H080) determined that this locality represents a rural, mill-based village with eighteenth through twentieth century components exhibiting much architectural and archeological integrity. Surface inspection, magnetometry, shovel testing, and unit excavation identified 47 historic features through well-planned sampling of the extensive site. Deep and potentially stratified deposits dating from the late eighteenth and early nineteenth centuries were found in association with Features 1 and 6, a standing mill and a probable residence, respectively. The other features offer much information on spatial organization, specifically on how mill-related structures are related to other components of the village: for example, a woolen factory, sawmill, blacksmith shop, wheelwright shop, general store, and other residences.

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Mr. Louis H. Ege, Jr.
Deputy Director
June 7, 1990
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We concur with GAI Consultants' very thorough exposition that 18H080 is a significant resource. The Simpsonville Stone Ruins is eligible for listing in the National Register of Historic Places as a district due to its significant concentration of buildings and structures in a late eighteenth through early twentieth century mill village important at the local level. Phase II testing at 18H080 has documented that this district reflects the importance of mills in the economic development of Howard County. This research also has shown the Simpsonville village to consist of a distinguishable collection of mill-related structures, some of which embody the earliest development of mill technology. Furthermore, the investigations of 18H080 demonstrated deep and potentially stratified archeological deposits; integrity of structural relationships; and capacity to yield important information contributing to the following historic period themes identified in the Maryland Comprehensive Historic Preservation Plan: agriculture; architecture; cultural; and economic. For these reasons, it is our opinion that 18H080 meets National Register "Criteria A, C, and D" (36 CFR 60.4), and thus is eligible for inclusion in the National Register of Historic Places.

We request the State Highway Administration's concurrence with our office's determination of eligibility for 18H080. Because of the presence of many above-ground features and their multiple levels of significance, it would be preferable if the proposed improvements to Route 32 could be redesigned so as to preserve the Simpsonville district in place. While the proposed right-of-way would directly affect only part of this resource, the new construction would destroy many important features and compromise the spatial integrity of the village.

If project redesign is not feasible, then a Phase III data recovery program would be necessary to mitigate the project's adverse effects on this significant archeological district. While GAI Consultants prepared a brief list of recommendations for this work and included cost and time estimates, our office requests to see a much more detailed data recovery plan prior to any Phase III investigations. This plan should address the "Guidelines for Archeological Investigations in Maryland", whose main goals for data recovery are to: maximize data retrieval; determine intra- and inter-site variability; and to test hypotheses. The Phase III plan should devote substantial attention to formulating specific hypotheses and other research issues and to describing how the investigation of specific site features will provide relevant information.

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Mr. Louis H. Ege, Jr.
Deputy Director
June 7, 1990
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A useful reference for the data recovery plan is the Advisory Council's handbook Treatment of Archeological Properties. We believe the following treatment issues should be explored:

- 1) designing the highway to minimize site destruction and to maximize retention of the site's spatial integrity;
- 2) nomination of 18H080 to the National Register of Historic Places;
- 3) execution of an historic preservation easement, or another long term protective mechanism, on those parts of 18H080 outside of the right-of-way in order to ensure perpetual preservation;
- 4) clearance of obscuring vegetation in those parts of 18H080 outside of the right-of-way so as to make a photographic record of all visible site features and their spatial relationships;
- 5) measures for interpreting the results of the archeological research to the general public.

The more detailed data recovery plan should also address the following comments on GAI Consultants' recommendations in Appendix K: a) the utility of backhoe trenching to help in the investigation of Feature 12; b) the need for archeological testing of the yard associated with the standing Myerly House (Feature 33; HO-165); and c) the "other expenses" for airfare, architectural consulting, backhoe rental, and special analyses need to be justified thoroughly.

We look forward to receiving a copy of the requested data recovery plan for 18H080. Additionally, we anticipate the review of the draft addendum report on the supplementary Phase II investigations at 18H0149. As indicated above, we suggest that the results of the extra Phase II work, once reviewed by us, be incorporated into the final Phase II report. The final document also should address items on the submitted errata list and other proofread corrections (e.g., several sentences in the last paragraph on p. 143). Additionally, this final report should reflect our review of GAI Consultants' National Register evaluation of 18H080 (pp. 122-133):

- 1) While we concur that 18H080 is National Register eligible at the local level, there has been insufficient comparative research to demonstrate the district's significance at state or national levels.

Mr. Louis H. Ege, Jr.
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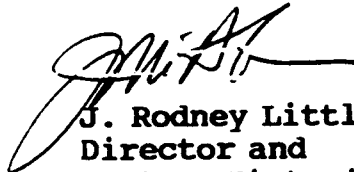
2) The argument for important historical information about the theme of transportation is too weak, given that location is cited as the major justification.

3) The use of Criterion B is unsubstantiated, because the association between 18H080 and significant persons is too general or weak (e.g., only land ownership).

If you have any questions or require further information, please contact Ms. Jo Ellen Freese (for structures) or Dr. Gary Shaffer (for archeology) at (301) 974-5007. The present cultural resource investigations are making an important contribution to our knowledge and understanding of the region's prehistory and history.

Thank you for your cooperation and assistance.

Sincerely,



J. Rodney Little
Director and
State Historic Preservation
Officer

JRL/GDS/meh

- cc: Ms. Cynthia Simpson
- Mr. David Atkins
- Ms. Rita Suffness
- Dr. Diane Beynon
- Dr. Ira Beckerman
- Ms. Alice Ann Wetzel
- Mrs. Doris S. Thompson
- Mr. Dave Dutton

Project 88-475-10

PROJECT
DEVELOPMENT
DIVISION



August 14, 1990

AUG 15 1 48 PM '90

570 Beatty Road
Monroeville, PA 15146
412-856-6400
FAX: 412-856-4970

Dr. Ira Beckerman
State Highway Archaeologist
2300 St. Paul Street
Baltimore, Maryland 21218

RE: Contract Number HO 292-202-770
MD 32, Howard County

Dear Dr. Beckerman:

Please find enclosed the revised significance statement, recommendations and research design for the Simpsonville Site as per your letter of July 27, 1990. The executive summary of additional work performed at Heritage Heights, included in the same request, was sent to you earlier under separate cover. Mr. Richard Ervin of your office indicated to me by telephone that he had reviewed this document and found it to be acceptable.

We are prepared at this point to finalize revisions to the final report on Phase II testing at Heritage Heights and Simpsonville as stipulated in your letter of July 3, 1990. It is my understanding that you now wish us to submit one camera-ready copy rather than the fifty copies stipulated in the contract. Please indicate your deadline for receiving this report at your soonest convenience.

It has been a pleasure working on Simpsonville; we are naturally disappointed that contract limitations preclude us from seeing the site through to its conclusion. Please be assured, however, that we will continue to stand prepared to assist the SHA in any way possible and are willing to lend whatever assistance we can to the contractor who is selected to finalize the work.

Yours faithfully,
GAI Consultants, Inc.


Jack B. Irion
Archaeological Manager

JBI:jbi
cc:Cynthia Simpson
enclosure

National Register Evaluation

GAI Consultants concludes that the Simpsonville Site (18HO80) is potentially eligible for listing in the National Register of Historic Places (NRHP) based on the significance and integrity of its historical, architectural, and archaeological components. The site remains as a surviving example of a late eighteenth through early twentieth-century rural village that contains a well-preserved example of a mill seat including a standing mill structure and other related features. GAI recommends that it be nominated as a Historic District.

The Simpsonville Site meets NRHP Criteria A, C, and D. First, it is significant in American History and the history of Maryland in that it was directly associated with the birth of the milling industry and those associated engineering and technological innovations which took place in Colonial America. These events had a significant contribution to the development and broad patterns of America's industrial and socioeconomic base (Criteria A). Secondly, the design and landscape utilization of the Simpsonville Site embodies distinctive characteristics of the period and methods of construction in the late eighteenth to nineteenth century (Criteria C). Although the structures do not represent the work of a master, the interrelationship of the mill features at the site embody the technological expertise of the early milling profession including the engineering involved in the early control of water power. Moreover, the spatial layout of mill features remains essentially intact, and may be studied archaeologically and architecturally. Finally, the Simpsonville Site has the potential for yielding stratified archaeological deposits dating to the late eighteenth century (Criteria D). Few sites in Maryland have retained such architectural and archaeological integrity enabling a wealth of information to be recovered through detailed archival research, architectural study, and more intensive archaeological fieldwork. The site possesses integrity of location, design, setting, workmanship, feeling and association as both a rural village and as an industrial milling site. The three basic criteria for significance evaluation are discussed separately as they reflect the interpretations generated from GAI's Phase II investigation.

District

The first consideration in GAI's assessment was to determine that the Simpsonville Site is a Historic District. According to the National Parks Service Guidelines (NPS1982), "A District is a geographically definable area - urban or rural, small or large - possessing a significant concentration, linkage, or continuity of sites, buildings, structures, and/or objects united by past events or aesthetically by plan or physical development" (NPS 1982:5).

The Simpsonville District can be defined as a small, rural manufacturing village with the milling industry as its principal

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focus. The District includes all those structures (residential, commercial, and industrial) and associated archaeological deposits that are confined within the immediate site area. GAI has mapped this area and it is illustrated in Map #1 (Map Pocket). The mill seat includes the standing stone mill (F 1) and associated milling features such as the Headrace (F 2), the milldam and gate (F 14 and F 15), the Tailrace (F 47), and associated water control features (F 9, F 12, F 19, F 34, F 35, F 36). The larger rural village site, of which the mill seat is a part, contains a collection of various structures/archaeological deposits including the location of at least one (F 4), and possibly two general stores (F 5), a possible sawmill (F 3 or F 11), a possible wheelwright's shop (F 23), a blacksmith shop location (F 28), and at least four residential locations (F 6, F 8, F 16, F 17). Surrounding the site on the opposite side of Cedar Lane and Route 32 are the locations of standing historic buildings including the Miller's House (F 39), two large mansions associated with the Owings family (F 30 and F 33), and the Owings Family Cemetery (F 46). Related transportational features also constitute important components of this community and include the mill path (F 18), the pre-nineteenth-century road (F 13), and the early nineteenth-century bridge abutment (F 10). These properties are considered by GAI to be integral parts of the Simpsonville Historic District.

With the exception of the standing historic houses and the cemetery, all the remaining features are strategically concentrated along the river for the facilitation of water power to the mill. The mill cluster makes efficient use of the natural topography of the valley, thus providing a discrete environmental utilization of the landscape and its setting. For example, while the mill and its associated features are located close to the river, (providing utilization of the natural drop in the river's course from the dam and headrace to the tailrace), the remaining features which are associated with transportational, residential or commercial use, are located well beyond the 100-year flood level in upland locations of the site. The structures are also clustered at the intersection of the Middle Patuxent River with the historic road (F 13) leading to Ellicott City and Baltimore. This settlement pattern exemplifies Wesler's et al. (1981) interpretation that most of the early mills in rural areas are located at such crossroads to facilitate ease in the transportation of the mill's finished products to the major ports of call.

The definition of the boundary for this site is based upon the shared relationship of the contiguous properties that make up the district and that are, or were at one time, directly associated with the milling industry. As was the case in the historic period, most small communities grew around a central location that served a specific purpose. In the case of Simpsonville, the central focus was the mill, which provided local farmers an opportunity to grind their wheat for both the local market and major commercial centers such as Ellicott City and Baltimore. As a centralized location for this activity, roads and bridges were constructed to facilitate transport to and from the Mill. Once

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established at a given location, millers often served as postmasters or merchants, offering for sale those items purchased at the larger industrial and commercial centers. As a result, most mills became the center for trade and barter, and it is not uncommon to see the development of general stores and specialized crafts/industries around the mill. Oftentimes, these stores were operated by the miller himself. Blacksmiths and wheelwrights established shops in these locations in order to manufacture and service the mill machinery as well as attend to the needs of local farmers (wagons, plows tools).

The evolution of this mill-based community can be examined through more intensive archaeological and historical research at the site. To date however, GAI has documented the presence of a mill occupation from at least 1768 to 1920. Features identified at the site appear to reflect the evolution of the rural village, which may be associated with the related growth of the surrounding mill community. Obviously as the milling industry burgeoned in the late 1700s (after the Ellicott Brothers produced a market for the grain trade) many custom mills shifted from serving a primarily local clientele (local farmers) to rural centers, like Simpsonville, which maintained economic ties with larger merchant mills (such as Ellicott Mills and Owings Mills). Those mills were incorporated into the regional, inter-regional, and international market through the industrial port of Baltimore. In summary, GAI recommends that the Simpsonville Site be nominated as a Historic Mill-Based District.

Context

In order to qualify for the National Register, a district must represent a significant theme or pattern in the history, architecture, engineering, archaeology or culture of a locality, state or the nation and must also possess characteristics that make it a good representative of that theme or pattern (NPS 1982).

The historical context of the Simpsonville Site has been outlined in the previous sections entitled, "Chronology of Mill Ownership and the Development of the Milling industry in Maryland" and in the "Overview of the Howard County Area". These sections identify the historical context and its resulting effects on the broad patterns of our history such as changing transportation, technology, settlement, and industrialization in the Howard County area. These sections also relate to the identification and investigation of certain study themes as outlined in the Research Goals section of this report, which are the context in which the Simpsonville Site can be more closely evaluated. These themes follow those stipulated in the Maryland Comprehensive Historic Preservation Plan 1986.

More intensive investigations at the site could significantly contribute to five important themes including:

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1. Economic (Commerce and Industry): The agri-industrial development of the grain industry and the textile industry can be investigated as it relates to the local production and consumption of the products processed at the Simpsonville Mill. Simpsonville provides an opportunity to investigate the evolution of a mill-based community within the context of the emergence and decline of the agri-business, and the industrialization of the region (i.e., the Baltimore-Washington area). In fact, it is apparent that Simpsonville developed as a result of the influence of nearby Ellicott City and other towns, with their associated growth in technology and transportation. Developments occurring at the Simpsonville Mill in the early 1800s, for example, can be directly related to the inventions and developments of Oliver Evans, who stimulated the milling industry at Ellicott City and at Owings Mills.

2. Technology Associated with Engineering and Milling: The technology theme (e.g., machinery, gears and belts, etc.) can be researched by the intensive investigation of the Simpsonville Mill Site. The stone mill, the stone bridge abutment, stone dressing on the racewalls, and the massive stone dam attest to the expertise in engineering technology that went into the original construction of the primary mill-related architectural features on the site. Perhaps one of the most interesting and significant aspects in the study of early engineering and technology at Simpsonville was the discovery of a hand-written transcription of an early license (the original dating to November 15, 1813) granted to Richard Owings by Oliver Evans, the author of the Young Millwright (1795). This document and the innovations that developed as a result of Evans' collaboration, is at the very foundation for the development of the American milling industry.

3. Culture; 4. Agricultural; and 5. Architectural (Community Planning and Landscape Architecture): The origin and historical development of Howard County can be directly related to the emergence of Simpsonville as a mill-based rural village. Moreover, the events surrounding the everyday activities associated with this small manufacturing village can shed light on the nature and extent of the interaction of planter, mill owners, merchants, small farmers, laborers, skilled workers, and servants/slaves during the post-Revolutionary period, and how this interaction affected the socioeconomic development of the Howard County-Baltimore area.

A mill has been associated with the Simpsonville Site as early as 1768 (and perhaps earlier). The earliest mention of the mill and dam appear in Dr. Joshua Warfield's last will and testament. In 1796, Richard Owings (brother of Samuel Owings of Owings Mills) purchased the mill and the surrounding property from his in-laws, the Warfields. Archaeological investigations concentrated around the mill produced a U.S. penny dating to 1797 from what is presumed to be the construction levels of the standing stone structure. The question arises whether the extant stone building was the original mill constructed by Owings or, if in fact, it was an addition to a

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pre-existing Warfield Mill. Nevertheless, this archaeological data testifies to the fact that the mill ruins may date as early as the late eighteenth century. Subsequent development and improvements to the property over the course of the next two hundred years can be documented through intensive archaeological and historical investigations.

Simpsonville is a surviving example of a historic rural mill-based village community that dates to the Colonial Period. It was closely tied through trade with early manufacturing/industrial centers like Ellicott City and Baltimore, as well as to outlying dispersed farms. The site retains much of its architectural, cultural, and geographic integrity, and is one of the few extant rural communities that has remained relatively undisturbed by modern urbanization. Stratified archaeological deposits were identified in several locations across the site. Moreover, the architectural integrity of the mill is clearly visible and many of the related surrounding structures of the community are still intact.

Significance

The Simpsonville Site is considered National Register eligible at the local level. Additional information gathered from more intensive research may also demonstrate significance at the state level.

Local Significance. Locally, the Simpsonville Site is the only surviving, intact example of a mill-based village community in Howard County. Although other mill sites are scattered throughout the area (e.g., the Roxbury Mill, Historic District of Ellicott City, and Savage Mill), Simpsonville remains the only example of a small, historic mill community that continues to preserve important archaeological, geographic, and architectural components. Moreover, the fact that the Simpsonville Site is affiliated with the founding families of Howard County (e.g., Warfields, Owings and Simpsons) further attests to its past and present importance to the surrounding community.

The economic transactions and developments of the agri-milling industry for Howard County and the state can be traced through historical records associated with the milling operation, the inventory records of the General Store, private documents of the associated owner/operators of the mill, and through the postal records of the mill seat. Examining the inter-relationship of the Simpsonville Site as a feeder of raw materials to the larger milling sites like Ellicott City and Baltimore is essential in determining the various levels of interaction between the economic outposts of the grain and textile milling industries in the area.

Simpsonville is significant both architecturally, and in the fact that it represent the remains of the once-thriving community of local manufacturers that was listed on both the 1878 Hopkins Map and on the 1860 Martenet Map (MHT Inventory). Based on the

preceding discussion, Simpsonville is significant to the local history of the area. 70

State Significance. The Simpsonville Site may also be significant at the state level. Additional information may shed light on its contribution to the understanding of the history of the sociocultural and economic development of the state's agricultural base and trade exchange networks that were created during its early historic period. In addition, the site spans a broad period of the state's history (late eighteenth century through early twentieth century), and has the potential to answer questions concerning the origin, development, and abandonment of milling communities throughout Maryland. The theme of the agri-milling industry is very important to the State of Maryland since, at one time, it was the largest producer of both grain and textiles in the United States. Although there are other sites that might document similar themes, there are no other properties that contain as much architectural, historical, archaeological, and geographic integrity as Simpsonville.

Criteria of Significance

In order to represent a significant theme or pattern in American history, a property must also meet one of the four criteria defined by the National Park Service. These criteria were introduced at the beginning of this section and affect the types of historical significance.

Criterion A: Properties may be eligible if they are associated with events that have occurred that have made a significant contribution to the broad patterns of our history. For example, the NPS (1982) document states that "a mill district reflecting the importance of textile manufacturing in a state during a given period" may be eligible for inclusion under Criterion A (NPS 1982:18). It may also be significant if "it has retained its integrity while other properties of the same associations have been altered" (NPS 1982:19).

Because Simpsonville retains significant integrity, and was essential to the economic development of the local area, GAI feels that the site meets the requirements set forth by Criterion A.

Criterion C: Properties may be eligible if they embody the distinctive characteristics of a type, period or method of construction, or that represent a significant and distinguishable entity whose components may lack individual distinction. This may include the way a property was designed or fabricated by a people or culture in past periods of history. For example "Districts are usually historic environments that convey a sense of time and place through the survival of many different kinds of features and the survival of the relationship among those features." (NPS 1982:22). Also a "building which illustrates the early or the developing technology of a particular structural system" may be eligible (such

as the mill) (NPS 1982:24). The mill is such an example because it is an exceptionally well-preserved feature at the site. 71

The MHT inventory form states that Simpsonville is significant architecturally since it is representative of the old stone buildings that dot the Howard County countryside today. Such buildings feature rectangular fenestration, flat stone lintels and stone quoining.

According to the National Register Guidelines, "a district must be a significant entity"; "it must be a distinguishable entity"....; and a "district may be significant as a whole even though it may be composed of components - sites, buildings, structures and objects - that lack individual distinction" (NPS 1982:25).

Specifically, the components of Simpsonville add to the historic character of the district even though some of the features lack individual distinction. These features do possess varying levels of geographic, archaeological, and architectural integrity however, and therefore add to the district as a whole.

According to the Guidelines "A district can be eligible if it illustrates the historic character of a place as developed over a particular span of time, which included more than one period of growth. For example, a district may be eligible that encompasses the commercial development of a town ... characterized by buildings of various styles and eras" (NPS 1982:27) A property may be eligible because it illustrates building practices that were traditional to the area, a period or a culture or because it embodies popular design preferences or construction practices that are no longer common" (such as the mill and the dam and the bridge construction) (NPS 1982:28).

Criterion D: Properties may be eligible if they have yielded or may be likely to yield important information. For example, the Guidelines state that "a building or structure is eligible if it provides or can yield important information about an aspect of history for which: (1) there are few or no other sources of information; (2) there are important research questions which can be appropriately answered through examination of the actual physical material of the building or structure; or (3) there is a need for comparison with other forms of information in order to understand more fully that history" (NPS 1982:31).

Several important issues were previously discussed in reference to the various research themes stipulated in the Maryland Comprehensive Historic Preservation Plan. Some of these may include questions concerning intrasite patterning, the role of the mill in stimulating the growth of the surrounding area, as well as the presence, nature, and variation of the various property types at the site.

- 1^v
- (1) What role did Simpsonville play in the economic development of the local area and surrounding region?

This question may be answered through a thorough discussion of the historical development of both Simpsonville and the surrounding area as well as isolating archaeological deposits related to the early history of the site. According to Langhorne's model (1976), gristmills, being market-oriented, should be associated with the emergence and growth of agglomerated settlements.

- (2) Can archaeological features/deposits be identified that can be related to the different residential, industrial, and commercial occupations at the site? To what extent, can we measure the consumer behavior and interaction between these groups?

Well preserved archaeological deposits must be identified to answer the above research question. These deposits may include ceramic, and floral and faunal assemblages that may be interpreted for household consumption patterns. Moreover, strong historical data is necessary in order for these deposits to yield important information.

- (3) What is the spatial arrangement of the various property types within Simpsonville and how does this layout change through time?

This question is related to the above research question. Although historic maps and deeds may provide useful information to explore this research question, archaeological research has the potential to identify and date property types and their components located within the mill-based village. Both structural remains and

Simpsonville Stone Ruins and its archaeological deposits worthy of National Register eligibility and more intensive research. According to McGrain (1973), there are only eight recorded mills in Howard County. Of those, Simpsonville, the Roxbury Mill, and the Savage restored community are all that remain as testimony to the early milling industry (Photographs 80 and 81). Other sites are merely isolated ruins, without the variety of associated residential and commercial structures that surround the Simpsonville Mill Seat. In fact, according to Hurry and Kavanaugh (1983), there is only one mill site in the entire State of Maryland that has been excavated by professional archaeologists (Epperson 1983).

Recommendations

The planned construction of Route 32 will directly impact over half of the features associated with the Simpsonville historic district. Some of the features identified within the highway right-of-way include the mill structure, mill race, buried stone alignment (Feature 6), wheelwright and blacksmith location, and other structural foundations. Several components of the district are located outside of the right-of-way and these should be preserved in perpetuity. Although the proposed construction will not directly affect these components, it will significantly affect their character and contextual association with those components identified within the right-of-way.

The proposed construction of Route 32 appears to have an adverse effect on the Simpsonville district owing to the planned destruction and alteration of a portion of the property, alteration of its surrounding environment, and the introduction of elements (visual and audible) that are out of character with the district and its setting (36 CFR 800.9). The Simpsonville historic district is important not only for its scientific information value, but also for its historic and cultural significance to the local community of Howard County. Therefore, it is suggested that the planned improvements to Route 32 be redesigned in order to preserve-in-place the entirety of the Simpsonville district. If this is not feasible, however then full scale excavation is necessary in order to maximize data retrieval, determine intrasite and intersite variability, and examine previously noted research issues. In addition, all features and structures located within the Simpsonville historic district, but located outside of the right-of-way should be identified and minimally, photo-documented and mapped.

Future research at the Simpsonville Site can provide an opportunity to examine the social and community patterning of a small rural, manufacturing mill village from the late eighteenth century through the early twentieth century. The Simpsonville Site is a unique cultural resource because it contains eighteenth through twentieth-century components which retain significant archaeological and architectural integrity. The site is locally significant in that it is the only surviving example of a mill-based village in Howard County. Moreover, it is associated with the founding families of Howard County and provides an opportunity to explore research issues important to the history of Maryland and the general development of the milling industry. According to Del Sordo, "what remains now is to begin fieldwork on mill buildings to determine the geographical and chronological limits of the tradition and to trace [those traditions] to their source" (Del Sordo 1982:75).

Potentially intact deposits were identified adjacent to the mill structure as well as in the area of Feature 6 (stone foundation). These deposits tentatively date to the late

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eighteenth to early nineteenth century. Additional units placed in these areas may help to explain the overall development of the site including the chronology of the extant stone mill, the site's changing settlement pattern, and its extent of economic integration. Moreover, the presence of a variety of structural features and property types at Simpsonville provides the opportunity to more closely examine the impact of its residential, commercial and industrial components to the development of the local area and surrounding region.

RESEARCH DESIGN

Phase II archaeological and historical investigations conducted by GAI Consultants, Inc. has demonstrated that the Simpsonville Site (18H080) meets NRHP Criteria A, C, and D (36CFR 60.4). Simpsonville has been nominated as an historic district since it represents an example of a rural, mill-based village community which retains many of its structural features and cultural deposits dating from the eighteenth through twentieth-century.

Additional Phase III investigations should focus on clarifying the industrial, commercial, and residential history of the Simpsonville Site. GAI's investigations concluded that a number of research issues may be explored including the intersite and intrasite settlement of the mill village and how it changed through time, and issues pertaining to rural consumer behavior. Since very few mills in Maryland retain the degree of architectural integrity as does Simpsonville, it is also recommended that the structure be documented to Historic American Engineering Record (HAER) standards along with other features identified at the mill seat. Specifically, additional archaeological excavations should focus on the southern and northern exterior walls of the structure (Feature 1) owing to the identification of deep and potentially stratified deposits during Phase II fieldwork. These excavations have the potential to provide additional information on the method and date of construction of this building. For example, was the existing mill structure built during the Richard Owings tenure or does it represent a renovated version of an earlier Warfield mill? Architectural comparisons should be made between the Simpsonville Mill and other similar structures in the local and surrounding region. GAI recommends that any archaeological excavations in the area of the mill should be preceded by extensive shoring of the structure.

Historical documents such as the federal census of industries and account books should also be consulted for information concerning the everyday operation of the mill. Additional excavations may be placed in the area surrounding the mill and in the area of the wheel pit (Feature 35) to better understand the layout and function of the mill structure, and how this changed through time.

Feature 4 (general store) was initially investigated by the Upper Patuxent Archaeology Group (UPAG) in 1984. However, GAI's review of this work suggests that a large portion of this structure including most of its interior was never delineated. Nineteenth-century records refer to a second store at Simpsonville, and several shovel test pits placed in this area during Phase II fieldwork recovered a number of artifacts dating to this period. The presence of a store within the district provides an opportunity of monitoring consumer behavior of the mill village through intensive archaeological excavations and the review of account books or journals. These documents would identify not only the presence of certain goods in the store at a specific point in time, but also various consumers. This may then be compared to subsistence data recovered through archaeological excavations

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placed in association with the store and other features at the site. Analysis of historical and archaeological information from Feature 4 can provide answers to important research questions such as:

- (1) Were the residents of Simpsonville economically self-sufficient?
- (2) To what extent did Simpsonville play in the economic development of Howard County?
- (3) What was the extent of the relationship between Simpsonville and the nearby Ellicott Mills?

Potential residential occupations at the Simpsonville Site were identified by GAI. Their study may be addressed through the investigation of Feature 6 (stone foundation) and possibly Feature 17. Deeply buried stratified domestic deposits were identified in association with Feature 6b and provide the best opportunity for addressing questions of consumer behavior. These deposits have tentatively been dated to the late eighteenth to early nineteenth-century and are among the earliest identified deposits at the site.

Sheet refuse identified throughout the site can provide important information concerning trash disposal patterns and the use of space. Feature 6b appears to have been an extensive yard deposit identified along the northwestern boundary of the highway right-of-way. Artifact deposits in this area include an upper layer of refuse and architectural debris dating from the late nineteenth through early twentieth century. These deposits may be analyzed in this and other portions of the site to reconstruct its twentieth-century intrasite settlement. The lower deposit, however contains artifacts predominantly dating to the first half of the nineteenth century including handpainted pearlware ceramics and empontilled bottle glass. As noted in the Phase II report, the presence of a yard deposit suggests that deep, well preserved cultural features not yet identified may be present (e.g., wells, privies). These deep features have been proven to contain rich artifact-bearing deposits that often provide the best contexts for recovering household dietary information and other data on household socioeconomic and consumer behavior. The purchasing patterns, and social and economic status of village residents may then be compared with other rural villages as well as those from urban contexts.

In addition to the above, it is important to note that a portion of the highway right-of-way north of Feature 13 and south of Feature 23 has not been adequately tested. These areas should be investigated at the Phase I/II level to determine the presence of structures/features and cultural deposits that may be related to the existing historic district.

Other features to be examined during Phase III fieldwork at the Simpsonville Site should include Feature 3, Feature 11, Feature 25, Feature 28, and all of the remaining features listed by GAI as being located within the right-of-way. Refer to Appendix K for specific information concerning the number of test units recommended for each feature.

MARYLAND
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17
William Donald Schaefer
Governor

Jacqueline H. Rogers
Secretary, DHCD

October 23, 1990

Ms. Cynthia D. Simpson
Assistant Division Chief
Project Planning Division
State Highway Administration
707 North Calvert Street
Baltimore, MD 21203-0717

Re: Preliminary Scope of Work,
Simpsonville Stone Ruins (18HO80),
MD 32, Howard County, Maryland
Contract No. HO 292-202-770

Dear Ms. Simpson:

Thank you for sending us for our review a preliminary draft of a scope of work for the mitigation of adverse effects to the Simpsonville Stone Ruins (18HO80).

In general, the draft scope for Phase III data recovery (cf. title of scope) presents a good outline of most of the archeological work necessary for mitigation. Our comments are organized below according to the main headings of the work plan.

PURPOSE

This section should state explicitly that data recovery is only one part of the mitigation plan for 18HO80. Because this archeological district is eligible for the National Register of Historic Places under Criteria A, C, and D (36 CFR 60.4), its significance extends beyond its potential to yield information important in history (Criterion D). Therefore, mitigation also should address the documentation of the following two aspects of 18HO80's significance: 1) its reflection of the importance of mills in the economic development of Howard County; and 2) its embodiment of the earliest development of mill technology in a distinguishable collection of mill-related structures.

Maryland

Division of Historical and Cultural Programs
Department of Housing and Community Development
Shaw House, 21 State Circle, Annapolis, Maryland 21401 (301) 974-5004

Ms. Cynthia D. Simpson
October 23, 1990
Page 2

The Trust believes that mitigation of effects on 18H080's significance under Criteria A and C can be accomplished through several measures. These measures include: recordation of individual structural features with photography and line drawings; aerial photography and mapping of the Simpsonville village as a whole; salvage (when appropriate) of architectural elements; thorough archival research on Simpsonville and comparative studies of regional mill industries; nomination of 18H080 to the National Register of Historic Places; preservation of portions of the archeological district through protective easements and other protective devices; and public interpretation of the cultural resource investigations.

We appreciate that the scope emphasizes how the study of relationships between features will be necessary. The scope also should indicate the need to relate the Simpsonville Stone Ruins to regional mill industries and economic trends. Finally, the SHA should consider the preservation of site parts through fencing, besides burial.

BACKGROUND

This section provides sufficient background material on the archeological district and prior research.

RESEARCH PROBLEMS

This section lists a very useful set of research questions. Many of the questions fall under the larger umbrella of research issues presented in the State plan, specifically questions 9 and 15 (Weissman 1986: Appendix 6). We trust that the consultant will refine and amend the SHA's list. The input of an historical archeologist with expertise on industrial sites in the Mid-Atlantic region would be helpful. The introduction should note how the archeological field research needs to concentrate on questions which documentary evidence cannot answer and how the archeological data will augment and enhance the historical record.

A couple of suggested additional research questions include:

1) Were any ethnic or minority groups (free blacks, immigrant workers, etc.) represented at Simpsonville? How does the archeological record reflect this occupation?

2) Why did Simpsonville's mill community fail to survive?

RESEARCH PLAN

We support the recordation of all surficial structural features and their spatial relationships. The consultant should examine aerial photography as a means of recording spatial relationships of features. SHA should contact the National Park Service to set the level of HABS/HAER documentation for the consultant. The scope should require the consultant to identify significant architectural elements that might be salvaged prior to demolition.

Ms. Cynthia Simpson
October 23, 1990
Page 3

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Recordation should include thorough documentation of all historic standing structures within the boundaries of the Simpsonville Stone Ruins archeological district. These buildings appear to include the Owings-Myerly House (HO-165), the Hatfield Residence (HO-268), and the Robinson House (6692 Cedar Lane). The Robinson House needs a MHT inventory form, and the other residences require additional photographic documentation of exterior and interior walls and elements. Architectural recordation should follow the "Guidelines for Completing the Maryland Inventory of Historic Properties Form: Standing Structures" (1990) and relate individual structures to the Simpsonville district.

The recommended excavation work provides a good start for the consultant. Perhaps the scope could request bidders to refine the list of specific tasks.

Finally, and very importantly, the scope needs to include a third part dealing with background research. As the "Guidelines for Archeological Investigations in Maryland" (McNamara 1981) state, full scale excavation is to be supplemented by four typed of background research: 1) summarization of previous work; 2) analysis of known collections; 3) formulation of testable hypotheses; and 4) devising suitable excavation strategies. This research must be conducted prior to the start of fieldwork; and it should be both specific to 18HO80 and related to the region. Site-specific research should help to determine the owners/occupants of the various residential and commercial structures through time. These occupancy data and the regional research issues should be used to formulate the final excavation and mitigation strategy.

FIELD METHODS

The discussion of documentary research would fit better under "RESEARCH PLAN." The personnel requirements also should call for a qualified architectural historian.

SITE PRESERVATION

This section should include a discussion of fencing around some parts of 18HO80 and the feasibility of acquiring State historic preservation easements for portions of the district outside of SHA property.

PROJECT SCHEDULING

As discussed at the 15 October 1990 meeting in Baltimore, we recommend that the consultant have at least 90 calendar days to submit a draft report after completion of an executive summary. Additionally, the Trust recommends against any winter excavations and their inherent poorer quality. The winter would serve as a good time for background research, clearing of vegetation, and some structural recordation.

Ms. Cynthia Simpson
October 23, 1990
Page 4

FIELD MEETINGS

The Trust would welcome being informed of field meetings and their subjects of discussion.

DELIVERABLES

The report should contain a strong, well-prepared section on management recommendations for those sections of 18HO80 that will not be destroyed. This part of the scope also might require the consultant to develop some form of public interpretation, including--if feasible--an on-site open house.

Finally, a supplementary section of the scope should state that the research must be performed in accordance with the "Guidelines for Archeological Investigations in Maryland," the Secretary of the Interior's Standards and Guidelines for Archeological and Historic Properties, and the Advisory Council's Treatment of Archeological Properties: A Handbook.

We appreciate this opportunity to comment and request the opportunity to review the consultant's proposal prior to the commencement of any mitigation. Additionally, as discussed in our October 15th meeting, the Trust will prepare a Memorandum of Agreement for SHA and Federal Highway Administration review; our target date for completion of this draft MOA is 7 November 1990.

If you have any questions or require further information, please contact Dr. Gary Shaffer at (301) 974-5007.

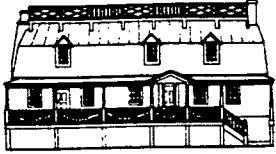
Sincerely,

Elizabeth J. Cole
Administrator
Archeological Services
Office of Preservation Services

EJC/GDS

- cc: Mr. Herman Rodrigo
- Ms. Sharon Conway
- Dr. Ira Beckerman
- Ms. Rita Suffness
- Mrs. Doris S. Thompson
- Ms. Alice Ann Wetzel

MARYLAND
HISTORICAL



TRUST

61
William Donald Schaefer
Governor

Jacqueline H. Rogers
Secretary, DHCD

October 29, 1990

Ms. Cynthia D. Simpson
Assistant Division Chief
Project Planning Division
State Highway Administration
707 North Calvert Street
Baltimore, MD 21203-0717

Re: Phase II Archeological
Investigations at the Simpsonville
Stone Ruins (18HO80) and the
Heritage Heights Site (18HO149),
Howard County, Maryland
Contract No. HO 292-202-471

Dear Ms. Simpson:

Thank you for sending us two copies of above-referenced final report. GAI Consultants, Inc., prepared the documents. We appreciate the consultant's attention to addressing our comments on the draft versions. The Phase II archeological investigations of sites 18HO80 and 18HO149 have made an important contribution to our knowledge of Howard County's cultural heritage; and the reports are valuable additions to our library.

As indicated in our letter of 23 October 1990, we are preparing a draft Memorandum of Agreement, regarding the mitigation of effects to National Register eligible 18HO80, for SHA and Federal Highway Administration review. If you have any questions or require further information, please contact Dr. Gary Shaffer at (301) 974-5007.

Sincerely,

Elizabeth J. Cole
Administrator
Archeological Services
Office of Preservation Services

EJC/GDS

cc: Mr. Herman Rodrigo
Ms. Sharon Conway
Dr. Diane Beynon
Dr. Ira Beckerman
Ms. Rita Suffness
Mrs. Doris S. Thompson
Ms. Alice Ann Wetzel

Division of Historical and Cultural Programs
Department of Housing and Community Development
Shaw House, 21 State Circle, Annapolis, Maryland 21401 (301) 974-5004

MARYLAND
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42
William Donald Schaefer
Governor

Jacqueline H. Rogers
Secretary, DHCD

November 30, 1990

Ms. Cynthia D. Simpson
Assistant Division Chief
Project Planning Division
State Highway Administration
707 North Calvert Street
Baltimore, MD 21203-0717

Re: Scopes of Work, Simpsonville
Stone Ruins (18HO80), MD 32,
Howard County, Maryland
Contract No. HO 292-202-770

Dear Ms. Simpson:

Thank you for sending us for our review two draft scopes of work (received 27 November 1990) for the mitigation of adverse effects to the Simpsonville Stone Ruins (18HO80). The scopes treat two potential bridge designs: Option 1 (3 span steel girder bridge) and Option 4 (4-cell box culvert).

We are pleased that SHA addressed a number of our comments (letter of 23 October 1990) on an earlier scope of work. The following remarks relate to several remaining concerns of the Trust. Because the two scopes are so similar, our comments apply to both construction options, unless otherwise noted.

PURPOSE

The opening paragraphs state that, "Construction...will have an adverse effect on parts of the site" or "on important parts of the site." It is essential to recognize that the adverse effect of construction will be on the archeological site/district as a whole. While direct physical disturbance or destruction will occur only in certain portions of the site, all site features will be adversely affected due to the nature of this site's significance and to the alteration of the property's setting (see 36 CFR part 800.9[b]). All sections of the final scopes of work should employ the term "adverse effect" according to its regulatory definition; another phrase (e.g., "to be directly destroyed") would better characterize individual features in the footprint of the bridge.

Maryland

Division of Historical and Cultural Programs
Department of Housing and Community Development
Shaw House, 21 State Circle, Annapolis, Maryland 21401 (301) 974-5004

Ms. Cynthia D. Simpson
November 30, 1990
Page 2

RESEARCH PROBLEMS

The Option 1 scope of work states that, "Because intensive data recovery efforts will be limited to those parts of the site that will be adversely affected by construction...." We suggest that this sentence should begin, " Because intensive data recovery efforts will concentrate on those parts of the site that will be physically destroyed by construction...." This rewording better reflects the Advisory Council's definition of adverse effect and our understanding that limited archeological excavations will be necessary outside of the project right of way to address certain research questions.

RESEARCH PLAN

This section should mention aerial photography as one means of recording all features once obscuring vegetation is removed. Additionally, either the scopes of work or the Memorandum of Agreement must detail the architectural recordation requested by the Trust (letter of 23 October 1990; telephone conversation of 19 October 1990 between Rick Ervin and Elizabeth Hannold) for the three standing houses at 18HO80 (HO-165, HO-268, and the Robinson House). Finally, it is our understanding that Option 1 might entail only the partial dismantling of the Feature 1 mill walls (and see Part 4. Excavation).

FIELD METHODS

As mentioned above, this section should reflect the Advisory Council's definition of adverse effect and our understanding that limited excavation will be necessary outside of the right of way to address specific research questions.

DELIVERABLES

As specified in our 23 October 1990 letter, the research must also be performed in accordance with the Secretary of the Interior's Standards and Guidelines for Archeological and Historic Properties, and the Advisory Council's Treatment of Archeological Properties: A Handbook. Furthermore, the consultant should detail, rather than just "explore," the methods of public interpretation.

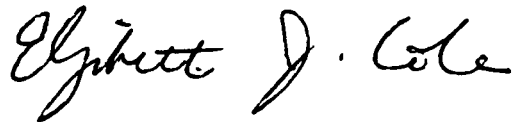
We appreciate this opportunity to comment. The scopes of work, with the implementation of our suggestions and the execution of the Memorandum of Agreement (MOA), will provide a sufficient level of effort for the mitigation of adverse effects to 18HO80 through: background research; photographic and other recordation of the village's archeological and architectural features and spatial patterning; intensive excavations; analysis and report preparation; avoidance/preservation measures; and public interpretation.

Ms. Cynthia D. Simpson
November 30, 1990
Page 2

The MOA should be executed before any mitigation begins. As discussed in our November 16th meeting, the Trust will revise the current draft MOA for SHA and Federal Highway Administration approval upon receipt and review of the consultant's data recovery plan and the SHA's detailed avoidance plan. While the paragraph in the scopes on "Measures to Avoid and Reduce Impacts" would provide sufficient information for consultants, the Trust requests SHA to prepare a more thorough avoidance plan that specifies: who will carry out the work and monitor its effectiveness; what precise forms of fencing or other measures will be employed; and exactly what parts of the archeological district will be protected. The Trust would like to use the SHA's detailed avoidance plan as an attachment to the MOA; it would be most useful if this plan were to include a map which showed the specific features (or feature parts) to be protected.

Thank you for your cooperation. If you have any questions or require further information, please contact Dr. Gary Shaffer at (301) 974-5007.

Sincerely,



Elizabeth J. Cole
Administrator
Archeological Services
Office of Preservation Services

EJC/GDS

- cc: Mr. Herman Rodrigo
- Ms. Sharon Conway
- Dr. Ira Beckerman
- Ms. Rita Suffness
- Mrs. Doris S. Thompson
- Ms. Alice Ann Wetzel

MARYLAND
HISTORICAL



TRUST

PROJECT
DEVELOPMENT
DIVISION

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45
William Donald Schaefer
Governor

Jacqueline H. Rogers
Secretary, DHCD

November 1, 1990

Ms. Cynthia D. Simpson
Assistant Division Chief
Project Planning Division
State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21203-0717

Re: Simpsonville Stone Ruins
(18HO80), MD 32,
Howard County, Maryland
Contract No. HO 292-202-770

Dear Ms. Simpson:

Enclosed please find a draft Memorandum of Agreement which we have prepared in order to help expedite the project's Section 106 review. The Agreement refers to a data recovery plan which should be the proposal submitted by SHA's selected consultant, reviewed and approved by SHA and MHT.

By copy of this letter we are soliciting the comments of the SHA, the Federal Highway Administration, and the Advisory Council on Historic Preservation on the Agreement. If you have any questions or require further information, please contact Dr. Gary Shaffer at (301) 974-5007.

Sincerely,

Elizabeth J. Cole
Administrator
Archeological Services
Office of Preservation Services

EJC:lld

cc: Mr. Herman Rodrigo
Ms. Sharon Conway
Dr. Ira Beckerman
Mrs. Doris S. Thompson
Ms. Alice Ann Wetzel

Division of Historical and Cultural Programs
Department of Housing and Community Development
Shaw House, 21 State Circle, Annapolis, Maryland 21401 (301) 974-5004

MARYLAND
HISTORICAL



TRUST

William Donald Schaefer
Governor

Jacqueline H. Rogers
Secretary, DHCD

February 27, 1991

Mr. Neil J. Pedersen, Director
Office of Planning and
Preliminary Engineering
State Highway Administration
707 North Calvert Street
Baltimore, MD 21203-0717

Re: Contract No. HO 292-202-770,
MD 32 from MD 108 to Pindell
School Road, Simpsonville
Stone Ruins (18HO80),
Howard County Maryland

Dear Mr. Pedersen:

This office has reviewed the new draft Memorandum of Agreement (MOA) for archeological and architectural investigations at the Simpsonville Stone Ruins (18HO80). This MOA includes two appendices.

We believe that the three-page body of the MOA is adequate and acceptable with your suggested changes. We have clarified only some of the wording (see enclosure). Please note that the SHA needs to prepare and to implement some of its public information plan before it receives recommendations from the consultant's report.

With respect to Appendix A (data recovery plan [John Milner Associates, Inc.]), the proposal reflects good comprehension of the purpose of the required work and develops excellent research questions tied to The Maryland Comprehensive Historic Preservation Plan (Weissman 1986). Several research problems which should be addressed in more detail are: 1) the reasons for both the development and the decline of the Simpsonville milling community; and 2) the visibility of any ethnic or minority groups in the district's archeological record. Further, as stated in our letter of 30 November 1990, it is essential to recognize that the adverse effect of construction will be on the archeological district as a whole. While direct physical disturbance or destruction will occur only in certain portions of the site, all features will be adversely affected due to the nature of this site's significance and to the alteration of the property's setting (see 36 CFR Part 800.9[b]).

Maryland

Division of Historical and Cultural Programs
Department of Housing and Community Development
Shaw House, 21 State Circle, Annapolis, Maryland 21401 (301) 974-5004

Mr. Neil J. Pedersen
February 27, 1991
Page 2

The excavation strategy in Milner's proposal concentrates, as we believe it should, on field investigations of features which will be directly impacted by construction. There should be a contingency plan, however, to reassign a limited number of planned excavation units to features outside the right-of-way, if some features within the construction zone fail to yield important deposits or if the investigation of particular research questions so demands. The consultant's proposed feature-specific studies appear to be well-reasoned. Still, we suggest that the consultant carefully consider analyzing building rubble, if enough is found to associate it with buildings and to derive important architectural information (p. 9).

Milner's proposed time frame for the project is reasonable. We believe, however, that the project manager's time for HABS/HAER recordation, National Register nomination, and excavation could be substantially reduced: Section 7.0 indicates that this person's duties will involve administration and review, and the cost estimate already has generous administrative and report preparation components. We have several additional budgetary concerns, an examination of which may reduce project costs:

- 1) While the survey fee for the topographic survey is justified, we understand that an aerial survey might produce the same level of detail for one-third the cost. An aerial survey would require sufficient deciduous vegetation in the project area and winter implementation. The state government may have the capacity to undertake such a survey itself. Aerial photography resulting from an aerial survey also would provide one of the Trust's desired products.
- 2) Since the consultant is based in Alexandria, Virginia, at a distance of only about 36 miles from Simpsonville, we believe that per diem expenses for meals and lodging are unwarranted for Milner employees (excluding its sub-consultants).
- 3) What word processing is referred to as a direct expense, when report preparation includes a line item for a secretary?
- 4) The consultant should identify the computer use indicated as a direct expense.
- 5) The consultant should outline the calculation of the estimated number of 22,000 artifacts requiring analysis.
- 6) Finally, are bids from other potential consultants available for review? Competitive solicitation of proposals would offer a comparative basis for evaluating costs.

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Mr. Neil Pedersen
February 27, 1991
Page 3

With respect to Appendix B (plan for auxiliary site treatment), we agree to SHA's changes, with only a couple of suggestions (see enclosure):

1) For Section IIA (Owner Notification), we believe that all landowners should receive recommendations for site preservation, even if they do not request them; otherwise, it is doubtful if many landowners would take the initiative to protect district elements on their property.

2) With respect to Section IIC (Public Interpretation), we have suggested inserting the summary of the interpretive efforts in the final assessment (Section IV); this practice would reduce the number of individual documents and make the results more available to cultural resources managers.

3) For Section III (Management Plan), we believe that SHA, as creator of the adverse effect on 18H080, should prepare the management plan. This plan, however, is not meant to be a long document; rather, it should be a concise set of recommendations. We suggest retitling this section "Management Recommendations." It is important that SHA informs all land managers of the recommendations, even though SHA itself will be responsible for implementing the measures only within its right-of-way.

4) With regard to Section IV (Final Assessment), this assessment is meant to be an evaluation of the effectiveness of all the auxiliary site treatment measures. We believe that its incorporation into the data recovery report will benefit more parties than if it were prepared as a separate document. In our opinion, the assessment will benefit both SHA and MHT in making decisions on archeological site treatment and mitigation measures on future projects.

5) Finally, Figure 1 remains to be produced in the composite, detailed format requested in our letter of 3 January 1991:

a detailed site map for the "Plan for Auxiliary Site Treatment" that depicts all archeological features, limits of the right-of-way, construction limits, bridge footprints, property lines and ownership, and, if possible, boundaries of the proposed Middle Patuxent Environmental Area.

Please make the needed additions to Figure 1. Also, the current draft of Figure 1 shows protective fencing in an irregular line rather than in the shape of an enclosure. We are concerned that this proposed fencing will not provide adequate protection for features on the north bank of the Middle Patuxent River. What would prevent construction activities on the north bridge abutment from accidentally harming features at the base of the slope?

Mr. Neil Pedersen
February 27, 1991
Page 4

We welcome your comments on this letter. We believe that, with the suggested changes, the actions and measures to be described in the final MOA and its appendices will constitute sufficient and acceptable mitigation of adverse effects to 18H080. Please note, however, that the remaining Phase I (and potentially other) archeological work needs to be completed in Area 9 (the hilltop west of Trotter Road) before the MOA can be executed. What is the status of these Phase I identification efforts?

Thank you for providing us this opportunity to comment. If you have any questions or require further information, please contact Dr. Gary Shaffer at (301) 974-5007.

Sincerely,



Elizabeth J. Cole
Administrator
Archeological Services
Office of Preservation Services

Enclosures
EJC/GDS

cc: Ms. Cynthia Simpson
Dr. Ira Beckerman
Ms. Rita Suffness
Mr. Herman Rodrigo



**Maryland Department of Transportation
State Highway Administration**

O. James Lighthizer⁹⁰
Secretary
Hal Kassoff
Administrator

August 5, 1991

Memorandum:

To: Cynthia Simpson
Assistant Division Chief
Project Planning Division

Attn: Mr. Wesley Glass

From: Richard Ervin *[Signature]*

Re: MD 32 from MD 108 To Pindell School Road
Phase III archeological investigations

As requested by Mr. Herman Rodrigo, following is a list of archeological features at the Simpsonville Stone Ruins expected to be affected by proposed construction.

All features are likely to contribute important information on feature age and function, community patterns, and socioeconomic differences. Because Simpsonville is a district, all such information is expected to apply to general research questions on the history and development of the mill village. In addition, individual features are expected to yield the following kinds of specific information relating to particular research questions:

<u>Fea. No.</u>	<u>Function</u>	<u>Expected Results</u>
#Feature 1	grist mill ruins	economic history of Simpsonville technology
#Feature 4	Store	local economic structure
#Feature 11	possible sawmill location	presence / absence of sawmill cultural landscape technology - associated industries
#Feature 12	waste race; mag. anomaly may be mill machinery	technology - associated industries
#Feature 17	dwelling	architecture, cultural landscape, and community society and culture
#Feature 23	wheelwright	technology - associated industries
#Feature 28	blacksmith	test for integrity technology - associated industries

My telephone number is 554-5537

- #Feature 30 residence architecture, cultural landscape,
and community
society and culture
- *Feature 33 Owings - Myersly architecture, cultural landscape,
House and community
society and culture
- #Feature 35/47 waste race physical data on race
understanding the plan of the mill
seat

Don't hesitate to contact me if you have any questions about this information or if I can be of further assistance.

RGE:rge

- * completely destroyed by proposed construction
- # partially affected by proposed construction

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William Donald Schaefer
 Governor

Jacqueline H. Rogers
 Secretary, DHCD

Office of Preservation Services

August 12, 1991

Ms. Cynthia D. Simpson
 Deputy Division Chief
 Project Planning Division
 State Highway Administration
 707 North Calvert Street
 Baltimore, MD 21203-0717


Re: Contract No. HO 292-202-770; Simpsonville Stone Ruins; MD 32 from MD 108 to Pindell School Road; Howard County

Dear Ms. Simpson:

Thank you for your letter of 26 July 1991 on the above-referenced project; however, we are unable to provide the concurrence you requested at this time.

The completion and execution of the final Memorandum of Agreement (MOA) by all involved parties will demonstrate that implementation of the MOA would constitute adequate and acceptable mitigation of all adverse effects from the proposed undertaking on the Simpsonville Stone Ruins (18HO80) District (see 36 CFR Part 800.6 for the role of the Advisory Council on Historic Preservation). Please note that the current draft MOA still requires a final data recovery plan and our agreement on wording (see our letter of 3 July 1991). We also understand that the draft MOA may require changes because of a new bridge design.

We look forward to cooperating with you on the finalization of the MOA. If you have any questions or require further information, please contact Dr. Gary Shaffer at (301) 514-7600.

Sincerely,

 Elizabeth J. Cole
 Administrator
 Archeological Services

EJC/GDS
 cc: Mr. Herman Rodrigo
 Dr. Ira Beckerman

MARYLAND
HISTORICAL



T-R U S T

Office of Preservation Services

William Donald Schaefer
Governor

Jacqueline H. Rogers
Secretary, DHCD

July 24, 1992

Ms. Cynthia D. Simpson
Deputy Division Chief
Project Planning Division
State Highway Administration
707 North Calvert Street
Baltimore, MD 21401

Re: Contract No. HO 292-202-
770; MD 32 - MD 108 to
Pindell School Road,
Howard County, Maryland

Dear Ms. Simpson:

Thank you for sending us the revised copy of the Memorandum of Agreement (MOA) for the Simpsonville Archeological District (18H080). We agree that the new wording provides for appropriate treatment of this historic property; and Mr. J. Rodney Little, our State Historic Preservation Officer, has signed the document.

We appreciate your cooperation and assistance in development of the MOA. Please send us a copy of the document, once all signatures are available.

If you have any questions or require further information, you may contact me at (410) 514-7638.

Sincerely,

Gary D. Shaffer
Gary D. Shaffer, Ph.D.
Preservation Officer
Archeological Services

GDS

cc: Dr. Ira Beckerman
Ms. Rita Suffness
Mr. A. Porter Barrows
Mr. Don Klima
Mrs. Phillip St.C. Thompson
Ms. Alice Ann Wetzel



MARYLAND
HISTORICAL



TRUST

Office of Preservation Services

PROJECT
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AUG 5 4 07 PM '92

William Donald Schaefer
Governor

Jacqueline H. Rogers
Secretary, DHCD

July 31, 1992

Ms. Cynthia D. Simpson
Deputy Division Chief
Project Planning Division
State Highway Administration
707 North Calvert Street
Baltimore, MD 21401

Re: Contract No. HO 292-202-
770; Simpsonville Stone
Ruins (18H080); MD 32--MD
108 to Pindell School
Road, Howard County,
Maryland

Dear Ms. Simpson:

In a letter dated 5 October 1990, the Trust concurred that an eastern shift of the right-of-way for the proposed Maryland 32/Cedar Lane interchange would be impractical. Your letter of 22 April 1992 with the Draft Supplemental 4(f) Evaluation carefully addressed our questions on the feasibility of a western alignment or a no build alternate.

While, from an historic preservation perspective, complete avoidance of the Simpsonville Stone Ruins District (18H080) would be optimal, SHA has made a reasonable argument that the chosen alternate adequately balances cultural resources concerns and other important issues. We are confident, therefore, that the Memorandum of Agreement we formulated with your office (signed 23 July 1992) represents an appropriate consideration of historic properties for the project.

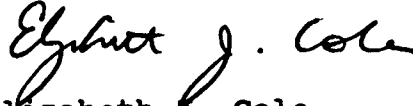
Maryland

Division of Historical and Cultural Programs
Department of Housing and Community Development
100 Community Place, Crownsville, Maryland 21032-2023 (410) 514-7600

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Ms. Cynthia D. Simpson
July 31, 1992
Page 2

If you have any questions or require further information, please contact Ms. Elizabeth Hannold (for structures) or Dr. Gary Shaffer (for archeology) at (410) 514-7600.

Sincerely,



Elizabeth J. Cole
Administrator
Archeological Services

EJC/GDS/EAH

cc: Dr. Ira Beckerman
Ms. Rita Suffness
Mr. A. Porter Barrows
Mr. Don Klima
Mrs. Phillip St.C. Thompson
Ms. Alice Ann Wetzel

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MEMORANDUM OF AGREEMENT

WHEREAS, the Federal Highway Administration (FHWA) proposes to assist the Maryland State Highway Administration (SHA) in the reconstruction of Maryland Route 32 between Maryland Route 108 and Pindell School Road/Cedar Lane in Howard County, Maryland; and

WHEREAS, the FHWA has determined that the undertaking will have an adverse effect upon the Simpsonville Stone Ruins (18HO80), a property considered eligible for listing in the National Register of Historic Places as a district, and has consulted with the Maryland State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (Council) pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act, as amended (16 U.S.C. 470f); and,

WHEREAS, the SHA participated in consultation, and has been invited to concur in this Memorandum of Agreement;

NOW, THEREFORE, the FHWA, the Maryland SHPO, the Council, and the SHA agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties. Execution of the actions and measures described in this Memorandum of Agreement and its Appendices constitute adequate and acceptable mitigation of adverse effects on the historic properties.

Stipulations

FHWA will ensure that the following measures are carried out:

I. Data Recovery and Mitigation

SHA will implement the data recovery plan, entitled Proposal for Data Recovery Investigations at the Simpsonville Archeological District (18HO80), and attached hereto as Appendix A, prior to and in coordination with those activities of the undertaking that could disturb the Simpsonville Stone Ruins (18HO80). Implementation of the undertaking and of the data recovery plan is contingent upon attaining funding for the undertaking, and upon written agreement for full federal participation in the data recovery plan. The cost of the data recovery plan shall not exceed \$350,000.00.

SHA architectural historians will complete the recordation of historic standing structures on the property subsequent to completion of archeological background research. This work will include preparation of a Maryland Inventory of Historic Properties form for the Robinson House (6692 Cedar Lane); additionally, existing archeological reports and existing background data will be utilized to prepare updated Maryland Inventory of Historic Properties forms for the Owings-Myerly House (HO-165) and the Hatfield Residence (HO-268). Maryland Inventory of Historic Properties forms will be prepared in accordance with "Guidelines for Completing the Maryland Inventory of Historic Properties Form" (July 1991). Exterior Photographs of the three historic properties will be provided. Sketch floor plans and interior photographs will

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be prepared for those structures for which admittance is granted by the property owner or tenant. The SHA will contact property owners or tenants by letter to request access for these purposes.

A. Performance Standards

All archeological and architectural work carried out pursuant to this agreement will be carried out by or under the direct supervision of individuals meeting, at a minimum, the appropriate federal qualifications presented in "Professional Qualifications" (36 CFR Part 66, Appendix C). In addition, all archeological work will be performed with reference to and consistent with "Guidelines for Archeological Investigations in Maryland" (McNamara 1981), the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 CFR 44716-44740, September 29, 1983), and the Advisory Council on Historic Preservation's Treatment of Archeological Properties: A Handbook (1980). Architectural recordation will follow the "Guidelines for Completing the Maryland Inventory of Historic Properties Form: Standing Structures (MHT 1990) and will relate individual structures to the Simpsonville district.

B. Scheduling

The background research and fieldwork components of the data recovery plan (Appendix A) shall be initiated 5 months prior to the Advertisement Date, and shall be completed at least 1 month before the Advertisement date. Prior to completion of field investigations, representatives of the SHPO and SHA will conduct one or more on-site meetings to examine the progress and sufficiency of the investigations. Upon completion of fieldwork, an Executive Summary will be prepared and submitted to the SHPO in order to evaluate whether the investigations constitute adequate and acceptable mitigation of adverse effects on the historic property.

C. Reporting

SHA will submit the draft report on the archeological data recovery plan, draft architectural inventory forms, and a draft National Register nomination form to the Maryland SHPO for review and comment. Any comments made within 30 working days after receipt will be taken into account in the preparation of the final report and final forms. SHA will provide copies of all final reports and forms to the Maryland SHPO, the Council, the Howard County Central Library, the Howard County Department of Recreation and Parks, and the Mid-Atlantic Regional Office of the National Park Service for possible peer review and submission to the National Technical Information Service.

II. Measures to Avoid and Reduce Impacts

In conjunction with the execution of the data recovery plan, SHA shall implement the "Plan for Auxiliary Site Treatment: Simpsonville Stone Ruins (18HO80)," attached hereto as Appendix B.

III. Public Information

SHA will prepare and implement, in consultation with the Maryland SHPO, a plan to interpret the results of the archeological and historic architectural research to the general public. This plan may include preparation of an informational brochure, an on-site open house, publication of an article, production of an audio-visual recording, presentation of a paper for a scholarly audience, coordination with Howard County's interpretive efforts for the Middle Patuxent Environmental Area, or other appropriate measures.

IV. Dispute Resolution

Should the Maryland SHPO or Council object in 30 days to any plans or actions proposed pursuant to this agreement, the FHWA shall consult with the objecting party to resolve the objection. If the FHWA determines that the objection cannot be resolved, the FHWA shall request the further comments of the Council pursuant to 36 CFR Section 800.6(b). Any Council comment provided in response to such a request will be taken into account by the FHWA in accordance with 36 CFR Section 800.6(c)(2) with reference only to the subject of the dispute; the FHWA's responsibility to carry out all actions under this Agreement that are not the subject of the dispute will remain unchanged.

Execution of the Memorandum of Agreement and implementation of its terms evidence that FHWA has afforded the Council an opportunity to comment on the reconstruction of Maryland Route 32 between Maryland Route 108 and Pindell School Road/Cedar Lane in Howard County, Maryland, and its effects on historic properties, and that FHWA has taken into account the effects of the undertaking on historic properties.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: Robert D. Bush Date: 12/13/92
Robert D. Bush, Executive Director

FEDERAL HIGHWAY ADMINISTRATION

By: George K. Frick, Jr. Date: 10-1-92
George K. Frick, Jr., Division Administrator

MARYLAND STATE HISTORIC PRESERVATION OFFICER

By: J. Rodney Little Date: 7/23/92
J. Rodney Little, State Historic Preservation Officer

MARYLAND STATE HIGHWAY ADMINISTRATION

By: Hal Kassoff Date: 8/6/92
Hal Kassoff, Administrator

APPENDIX A

1.0 INTRODUCTION

1.1 Purpose of the Investigations

Phase II archeological investigations at the Simpsonville Stone Ruins (18HO80) demonstrated that the archeological resources are eligible for the National Register of Historic Places (NRHP) as an archeological district (Beynon and Irion 1990). However, construction of a 2-span steel-girder bridge structure over the Middle Patuxent River will have an adverse effect on portions of the eligible property. To mitigate the adverse effect of construction, Phase III data recovery investigations are proposed, including archival research, photographing the resources, recording above-ground structural features and identifying architectural elements for salvage, the partial dismantling and shoring of the walls of the standing ruin, and excavating features that will be adversely affected by construction. Portions of the site that will not be adversely affected will be preserved by fencing during construction and subsequent burial by the State Highway Administration (SHA).

The purpose of data recovery investigations is to recover the information at Simpsonville which will contribute to understanding Maryland history. The objectives of the investigations include testing research hypotheses, maximizing data retrieval, and determining intrasite and intersite variability. The investigations will be guided by a research design based on the research problems generated by previous work at Simpsonville and other sites in the region. The data recovery investigations are designed to assist in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, the Department of Transportation Act of 1966, and other applicable federal and state mandates and will be performed in accordance with *Consultant Specifications for Archeological Procedures, Guidelines for Archeological Investigations in Maryland, Secretary of the Interior's Standards and Guidelines for Archeological and Historic Preservation, and Treatment of Archeological Properties: A Handbook*.

Simpsonville, which has been determined eligible for the NRHP under criteria *a*, *c*, and *d*, has the potential to yield important information on the agricultural, architectural, cultural and economic history of Howard County from the late seventeenth century to the early twentieth century. The Simpsonville archeological district is a complex of features (buildings, structures, landscape features and archeological remains) related to milling. The proposed data recovery investigations at Simpsonville will address both the information content of the contributing resources and the relationships among those resources. Research questions will address milling in the economic development of Howard County and early milling technology as represented by the Simpsonville resources as well as the reasons for the development and decline of the Simpsonville milling community.

1.2 Description of the Project Area

The Simpsonville archeological district is in the Patuxent drainage of the Piedmont physiographic province. Most of the contributing resources are located on the forested floodplain of the Middle Patuxent River; some resources are on the adjacent bluff. Soil profiles indicate that the district has never been plowed, and there are stratified, undisturbed archeological deposits over 1 meter (m) below the surface. The district, as defined by the Phase II investigations includes about 24 acres (9.6 ha); however, the construction of the 2-span steel girder structure will affect only a portion of the district. Therefore, the project area for the data recovery investigations will primarily be limited to the area of potential effect, defined by the features which will be affected according to the scope of work prepared by the

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history represent the Rural Agrarian Intensification context, when agricultural communities were established along road networks, and commerce in agricultural products, such as flour, stimulated the development of port towns.

Water-powered gristmills were often joined by other industrial and commercial enterprises which also relied on water power (Frye 1984:29), such as the sawmill and woolen mill at Simpsonville, or provided services for the mill community, like the wheelwright and blacksmith shops and the general store at Simpsonville. The histories of these mills and shops reflect developments in the local community as well as the regional and national economic climate. These businesses reflect the effects of the Agricultural-Industrial Transition context experienced around Baltimore. However, rural industries participated in the regional economy, although the specific industries represented at Simpsonville were still tied to exploiting natural resources (timber) and processing agricultural products (grain and wool).

Simpsonville's relationship to the Industrial-Urban Dominance context is limited. While the mill complex persisted into the early twentieth century, Simpsonville remained a small, agricultural community, removed from critical transportation networks (the nearest railroad station was at Ellicotts' Mills, 8 1/2 miles away) and peripheral to urbanism and industrial development in cities with ports or near the fall line. By the 1870s, the Midwest had become the nation's major grain and flour producer, and heavy industry developed in population centers, like Baltimore, which offered a large labor force. Howard County experienced little population growth after the middle of the nineteenth century (Wesler et al. 1981:156). Although Simpsonville, with its mills, shops, and general store, functioned as a service-center for the surrounding farmsteads, its sphere of influence diminished by the twentieth century. Several issues which reflect Simpsonville's economic history will be addressed:

- examine the stone mill's documented history in light of changes in local, regional, and national markets;
- examine the relationships among the group of water-powered industries at Simpsonville in terms of the local, regional, or national markets;
- examine the community's participation as consumers of industrial goods by examining documentary records of goods brought into the community by the general store and comparing these to goods represented in domestic archeological deposits; compare deposits from various household types represented, such as owners or laborers, which may be within the community;
- examine Simpsonville's place in the regional economy, in terms of its position in a central place hierarchy (Hodder and Orton 1968:54-85) at several points in time, using available historic maps to trace the community's position in the hierarchy; and
- examine whether changing technology and the scale of the milling operations in the late nineteenth and early twentieth centuries affected the competitiveness of the mills and therefore the viability of the community.

2.3 Architecture, Cultural Landscape, and Community at Simpsonville

The material remains of the Simpsonville district represent the cultural concepts of land use and building design held by the owners and occupants of the community. The architecture of Simpsonville reflects the function, location, and construction date of the buildings. Investigation

like the Middle Patuxent, were developed as sources of water power during the middle and late eighteenth century (Wesler et al. 1981:155). The development of roads, turnpikes, and railroads also influenced settlement, commerce, and industrial development. Therefore, the issue of transportation and the history of Simpsonville will be addressed:

- consider the relationship of local and regional transportation systems (water, roads, and rail) to the settlement, development, and decline of Simpsonville.

2.6 Technology

Developments in milling technology, such as Oliver Evans's innovations in the late eighteenth century, the development of roller milling in the 1870s, and the introduction of steam power by 1900 (Frye 1984:28, 34, 36), as well as the development of power looms (Weber 1984:78), were important to the history of the industries and the mills at Simpsonville. Mills which incorporated these innovations prospered; those which did not could not remain competitive. The nature and history of milling technologies employed at Simpsonville will be considered:

- examine the role of milling technology in understanding the plan of the mill seat;
- investigate developments in milling technology during the period of occupation, such as Oliver Evans's system of mechanization and the development of roller milling, and the effect of such developments on the market orientation and economic success of the Simpsonville mill; and
- investigate archeological evidence for the associated industries, such as a sawmill and woolen mill at the mill seat.

remains. Artifacts will be bagged by provenience unit. Soil color, texture, and inclusions (natural and cultural) will be recorded. Appropriate plan and profile drawings, and photographs (black-and-white print and color slide) will be selected for each excavation unit. One-liter soil samples will be collected for flotation. Building rubble and unidentifiable metal will be counted in the field. All unidentifiable metal and the majority of the building rubble will be left in the field. A sample of building rubble will be retained if it can aid in understanding building history and construction techniques.

Small features revealed in excavation units will be mapped, recorded, and excavated separately from the surrounding strata. Artifacts from features will be bagged separately, and flotation samples will be collected.

Features discovered during data recovery investigations which represent buildings or structural remains (such as wells or privies) will be tested and evaluated for significance as contributing resources. Data recovery excavations will be conducted for significant resources, within the limits set forth in the following field plan.

3.3.2 *Field Plan*

Data recovery excavations will focus on those resources which will be affected by construction. In addition, two features not tested during the Phase II excavations will be tested and evaluated. For proposal purposes, it is assumed that all features evaluated as part of the study proposed here will require data recovery investigations. The proposed excavations will also take into account testing, evaluation, and recovery of a limited number of features discovered during the Phase III excavations. It is understood that the allotment of test units to features proposed herein is meant as a general guide to the field investigations and that effort may be shifted from one feature to another depending on the discoveries.

The 11 features which will be adversely affected by the construction include remains of buildings (Features 1, 4, 11, 17, 23, 28, 30, and 33) and water-diversion structures (Features 12, 35, and 47). Related features are discussed below; in some cases, smaller features are related to more than one other feature. Such features are discussed with each related feature.

3.3.2.1 *Feature 1, Stone Mill*

In preparation for the Phase III excavations, the standing stone walls of the mill (Feature 1) will be shored or removed. A consulting structural engineer with expertise in historic structures will evaluate the stone walls of Feature 1 at the beginning of the project. Phase II investigations indicated that preserved archeological deposits around Feature 1 may date to the late eighteenth century. It will be necessary to expose a large portion of the floor of Feature 1 to record floor features and investigate the relationships among the mill features. The western half of the floor, which is covered with a thin layer of earth and debris, will be completely cleared. The eastern half is covered with rubble from the collapse of the east wall. Two trenches will be excavated through the wall debris to investigate the floor in that area. After the floor is exposed, the backhoe will be used to remove sections of the concrete floor to expose the deposits below. Four 1-by-1-m units will be excavated under the floor. Additional data recovery excavations will include excavation of 6 1-by-1-m units to expose construction features associated with the mill exterior. Some units will continue to explore the builder's trench defined in the Phase II study to investigate the construction date of the feature. Two machine trenches will be excavated adjacent to the south wall to investigate the deep deposits which are said to contain the builder's trench.

The deposits removed above the floor in the mill's interior will not be screened since these deposits postdate the burning of the building. However, the soil and debris will be examined

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investigations, although ferrous metal, charcoal, and stained soil have been observed. One backhoe trench and four 1-by-1-m units will be excavated to evaluate the feature's location and integrity. If the feature represents a preserved structure or deposit, up to 8 additional units will be excavated to examine the feature's function, configuration, and construction date and to explore associated activity areas.

3.3.2.8 Feature 30, Stone Foundations

Feature 30 is a cluster of three foundations which have tentatively been identified as the remains of the Major H. H. Owings residence which appears on the 1860 Martenet map. The feature will be mapped and tested for integrity. The portions of the feature within the right-of-way will be evaluated for significance. Shovel tests will be excavated at 10-m intervals across the surface of the feature, and 2 to 4 1-by-1-m test units will be excavated to evaluate the significance of the feature. It is not anticipated that data recovery will be necessary given current project design.

3.3.2.9 Feature 33, Owings-Myerly House

Feature 33, the Owings-Myerly house (HO-165), is located south of Maryland Route 32. The yard area around the house will be tested and evaluated for significance as a contributing archeological resource. Shovel tests will be excavated at 10-m intervals in the yard. Six test units will be excavated, some adjacent to the house, and others, in areas indicated by positive shovel tests, to evaluate the significance of the feature. If there are significant contributing archeological resources, 10 units will be excavated to explore activity areas.

3.3.2.10 Temporary Traffic Bypass Road

This is an area of approximately 750 sq m located south of Cedar Lane which was not tested during previous work. The area will be tested with shovel tests at 10-m intervals. If potentially significant archeological resources are found, 4 1-by-1-m units will be excavated to determine their significance. If there are significant resources, an additional 6 units will be excavated.

3.3.2.11 Summary

A maximum of 76 units or 76 sq m will be excavated. In addition, a maximum of 10 backhoe trenches will be excavated. It is estimated that a ten-member field team will require 31 days to complete the 76 units and shovel tests. Another 5 days will be required for machine excavation of the trenches, 4 days to clear the floor of Feature 1, 10 days for clearing the vegetation in the district. Shovel testing of Features 30 and 33 and the area south of Cedar Lane will be conducted before the excavations begin and will take approximately 5 days with a four-member field team.

3.4 Contingency Plan

The estimated maximum number of excavation units proposed in Section 3.3 is based on the assumption that all areas that have not been tested at the Phase II level will contain significant deposits. Thirty-two units out of the proposed 76 units are contingency units. These units will not necessarily be excavated. However, if these units are not needed in the area planned, some of them will be reassigned, if appropriate, to features or areas that are more complex than anticipated, or that require additional excavation to address the research questions. Furthermore, if these contingency units are not needed elsewhere, eight will be assigned, after consultation with SHA and MHT, to areas outside the right-of-way which may aid in addressing the research questions.

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accordance with the contract documents. A brief report of observations will be prepared following each visit.

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4.0 REPORT PREPARATION

JMA will prepare and produce an Executive Summary and a detailed technical report. The purpose of the Executive Summary will be to summarize the field findings and draw preliminary conclusions based on a cursory analysis of the material recovered. The purpose, methods, and results of the data recovery investigations and management recommendations will be documented in a detailed technical report, which will conform to the *Guidelines for Archeological Investigations in Maryland* (McNamara 1981). The report will include discussions of the research problems, research plan, field and laboratory methods, analyses and interpretation of the data in terms of the research problems. Specific information on individual features will be presented as well as discussions of the chronological and functional relationships among the contributing resources of the Simpsonville archeological district. Recommendations will be included which address public interpretation of the district and management of the portions of the district which will not be directly affected by bridge construction.

Copies of appropriate HABS/HAER photographs and graphics will be included in the report. The HABS/HAER documents will be prepared for separate submission to the Mid-Atlantic Regional Office of the National Park Service.

Five bound copies the draft report will be submitted to SHA. JMA will address review comments and submit five bound copies, one unbound camera-ready copy, and one copy of the final report on 5 1/4 inch diskette in WordPerfect 5.1. The draft and bound copies of the report will have xerox plates; the camera-ready copy will include photographic prints.

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Appendix B

Plan for Auxiliary Site Treatment: Simpsonville Stone Ruins
(18HO80)

The State Highway Administration (SHA) Division of Bridge Design and the Environmental Evaluation Section have coordinated closely during the design process to minimize the effects of construction of Bridge No. 13136 (Cedar Lane over Middle Patuxent River) to the Simpsonville Archeological District (18HO80). As a result, substantial portions of the District will not be directly impacted. Features in the highway right-of-way not in the footprint of bridge substructure units will be fenced and avoided during construction. Furthermore, the Howard County Department of Recreation and Parks is developing plans that, when implemented, would include large portions of the site outside the highway right-of-way within the proposed Middle Patuxent Environmental Area. In addition, three privately owned properties are within the District. SHA will implement the following treatment plan to facilitate avoidance and future protection of those portions of the archeological District not directly impacted or subjected to data recovery. The plan incorporates fencing and protective measures during construction, monitoring site disturbance, working with the other involved property owners to promote long term protection and preservation of the District (as described in Section IIB), development of management recommendations for surviving District components (Section III), and preparation of a final assessment of the treatment measures' effectiveness (Section IV).

I. Auxiliary Site Treatment Measures within SHA Right-of-Way and Construction Zone

A. Fencing:

Protective fencing is a major component of the auxiliary site treatment plan to be implemented by SHA within its right-of-way and construction zone. A farm-type fence will be placed to protect parts of the District on the north bank that are within the right-of-way but outside the footprint of the north pier and north abutment (Figures 1 and 2).

The vertical geometry of the chosen bridge affects the walls of the Feature 1 mill ruins. The upper portions of the Feature 1 walls will be partially removed, but Feature 1 and other features will be protected with fencing to prevent damage to archeological deposits during construction. Currently, the mill walls are unstable and pose a potential safety hazard for future exhibition or archeological investigation. Partial removal will serve the dual purposes of making the feature safe and providing necessary clearance between the top of the feature and the bottom of the proposed steel girder bridge. The base of the walls would be left in place to preserve Feature 1 and its significant archeological information. Feature 1 will be permanently fenced at the end of construction.

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CFR Part 60.6) as an individual or contributing resource; and b) inform the Maryland SHPO of the discovery and of the determination of National Register eligibility. If the Maryland SHPO concurs that the resource meets National Register Criteria, an appropriate mitigation plan for its avoidance, protection, recovery, or destruction without recovery will be developed by SHA in consultation with the Maryland SHPO. Work in the immediate area of the resource shall not proceed for a period of up to fifteen (15) days after notification of discovery, to allow appropriate mitigation measures to be completed, or to determine that the resource does not meet the National Register Criteria.

II. Auxiliary Site Treatment Measures Outside SHA Right-of-Way

Preservation in place and public interpretation are the main auxiliary site treatment measures to be implemented outside the right-of-way. SHA will take lead responsibility for contacting all property owners within the District to inform them of the significant components of the District on their properties. SHA will encourage the protection, long-term preservation, and interpretation of these important features. The SHPO will be responsible for developing and implementing historic preservation easements.

Several property owners control or plan to control portions of the District. Howard County proposes to develop the Middle Patuxent Environmental Area in order to preserve and conserve a portion of the area's natural environment for county residents ("Management and Development Study for the Middle Patuxent Environmental Area," prepared in 1981 by Miller/Wihry/Lee, Inc., for the Howard County Department of Recreation and Parks). The Environmental Area is also intended to promote environmental awareness, appreciation, and learning. These management goals of the Howard County Department of Recreation and Parks are highly compatible with the goal of preserving portions of the District and interpreting the site to the public. A hiking trail under consideration by the Department of Recreation and Parks would facilitate public interpretation of the site. Visible features such as the remains of the milldam (Feature 15), the race gate (Feature 14), the north bridge abutment (Feature 10), the mill ruins (Feature 1), and a structure foundation (Feature 3), can be used as representations of the history of the milling industry. SHA will cooperate with the Howard County Department of Recreation and Parks, which has preliminarily agreed to make these features an integral part of the proposed park to preserve and protect the archeological site. This cooperation will include, but not be limited to, providing information on the District for interpretation, and providing access to the SHA right-of-way. These plans are contingent upon the ability of Howard County to obtain property rights.

Features outside the proposed SHA right-of-way that will be included within the proposed boundary of the Middle Patuxent Environmental Area are: large parts of Feature 2, the millrace;

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owners, and the appropriate SHA Engineering District responsible for maintaining the right-of-way. SHA will be responsible for implementing those management recommendations related to parts of the Simpsonville District within the SHA right-of-way.

IV. Final Assessment

Upon completion of the auxiliary site treatment measures, SHA will prepare a written assessment evaluating the effectiveness of all site treatment measures listed in Appendix B and employed to protect the District from construction impacts. The assessment will be submitted to the SHPO and FHWA, and will discuss each measure's success, problems, and provide recommendations on the desirability of employing the measure on future projects.

NOTES:

1. Figure 1 of the Memorandum of Agreement is identical to Figure 3 of the Supplemental 4 (f) Evaluation.
2. Figure 2 of the Memorandum of Agreement is identical to Figure 9 of the Supplemental 4 (f) Evaluation.

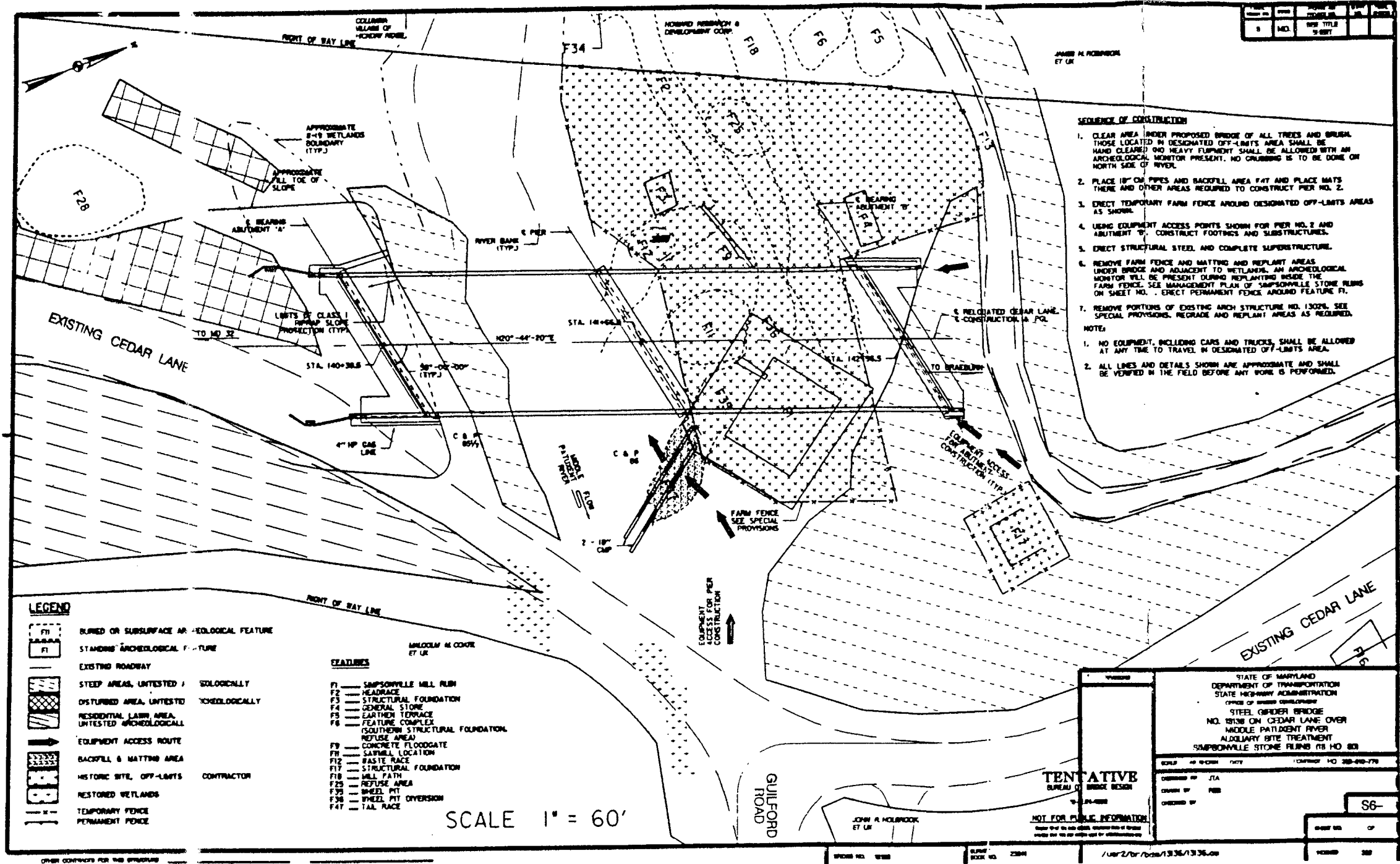
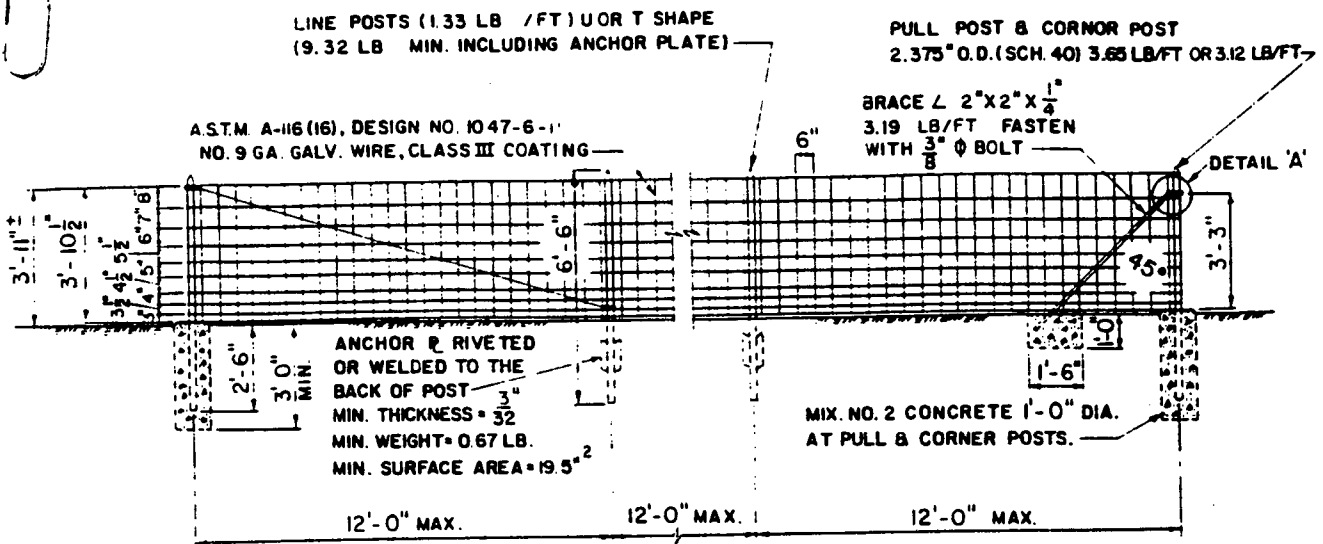
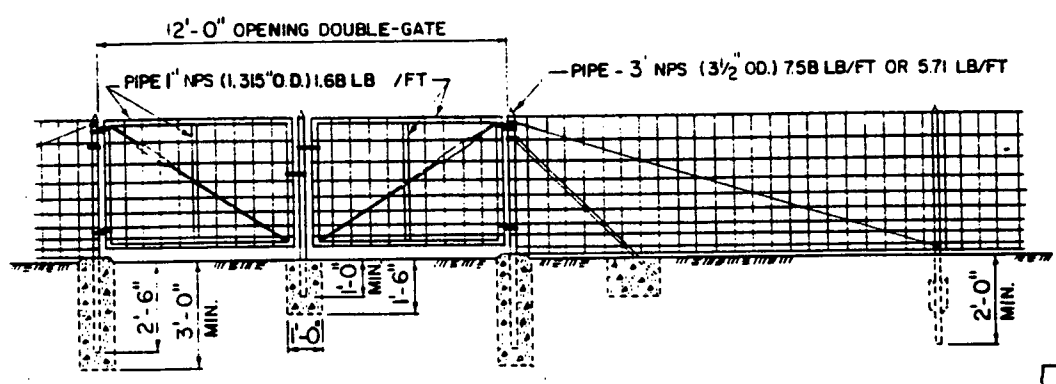


Figure 3. Map showing the proposed alignment of the temporary, farm-type fence to be erected to protect portions of the Simpsonville Archeological District during construction of Bridge No. 13136 (Cedar lane over the Middle Patuxent River). The bridge pier on the north bank (at Station 141 + 66.5) would be constructed from the south (between the pier and the riverbank) to minimize impact to significant features. Access would be from present Cedar Lane, travelling west across the Feature 47 waste race, as shown by arrows. Feature 47 would be filled and protected with a mat during construction to lessen damage from construction traffic. Construction of the north abutment (at Station 142 = 96.5) would be accomplished entirely from the top of the hill (as shown by arrows), thus avoiding damage to significant archeological features on the floodplain. However, the footslopes of the north abutment will affect Feature 4. After construction, a permanent fence will be installed around Feature 1.

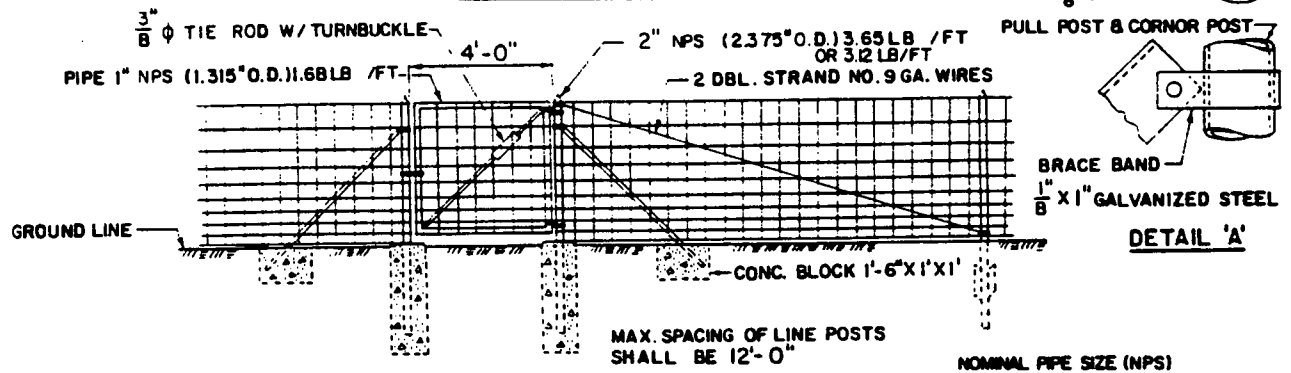


GENERAL DETAILS



GRATE FRAMES & POSTS SHALL BE OF A.S.T.M. A-120 HOT DIPPED GALV. PIPE.

DOUBLE SWING GATE



SINGLE GATE

NOTES:
 POSTS IN ROCK - WHERE SUBSTANTIAL ROCK IS ENCOUNTERED A HOLE ONE (1") INCH LARGER IN DIAMETER THAN THE POST AND OF 12" MINIMUM DEPTH FOR LINE POSTS AN 18" MINIMUM DEPTH FOR TERMINAL POSTS, SHALL BE MADE AFTER INSERTING THE POSTS, THE HOLES SHALL BE BACK FILLED WITH A HANDMIXED 1:2 MORTAR CONSISTING OF ONE PART PORTLAND CEMENT AND TWO PARTS FINE AGGREGATES MIXED TO A PLASTIC CONSISTENCY SHOWING NO SIGNS OF FREE WATER. THE HANDMIXING AND CONSOLIDATION OF THE MORTAR SHALL BE PERFORMED IN A MANNER APPROVED BY THE ENGINEER.
 THE WEIGHT OF STEEL PIPE CALLED FOR ON THIS STANDARD SHALL NOT VARY MORE THAN - 5% FROM THE INDICATED WEIGHT, BUT MAY EXCEED SUCH INDICATED WEIGHT. THE WEIGHT OF STEEL SHAPES CALLED FOR ON THIS STANDARD SHALL NOT VARY MORE THAN - 2.5% FROM THE INDICATED WEIGHT, BUT MAY EXCEED SUCH INDICATED WEIGHT.

Figure 4. Specifications of the temporary farm-type fence that will be used to protect portions of the Simpsonville District during construction.

STATE OF MARYLAND
DEPARTMENT OF TRANSPORTATION
STATE HIGHWAY ADMINISTRATION
 STANDARDS FOR HIGHWAYS AND INCIDENTAL STRUCTURES
 4'-0" FARM TYPE FENCE



County Council of Howard County COUNCILMEMBERS 113

GEORGE HOWARD BUILDING
3430 COURT HOUSE DRIVE
ELLICOTT CITY, MARYLAND 21043-4392
313-2001

PROJECT
DEPARTMENT
DEC 11 12 25 PM '90

- C. Vernon Gray, Chairperson
District 3
- Paul R. Farragut, Vice Chairperson
District 4
- Darrel Drown
District 2
- Charles C. Feaga
District 5
- Shane Pendergrass
District 1

December 10, 1990

Mr. Louis H. Ege, Jr., Deputy Director
Office of Planning and Preliminary Engineering
State Highway Administration
P.O. Box 717-707
N. Calvert Street
Baltimore, MD 21203-0717

Dear Mr. Ege:

I am writing about the Mill archeological site located off of Cedar Lane at Route 32 in Howard County. I understand that your consultant has completed a full evaluation of the site to identify the sites' archeological potential.

I would like to request a copy of the Phase II report when it becomes available shortly after the first of the year. Thank you for your attention to this matter.

Sincerely,

Paul Farragut
Vice Chairperson

PRF00919/jm/gt/PLN5

cc: Ms. Hilda Woodall



**Maryland Department of Transportation
State Highway Administration**

Howard County 114
Richard H. Trainor
Secretary
Hal Kassoff
Administrator

December 24, 1990

Mr. Paul Farragut
Vice Chairperson
County Council of
Howard County
3400 Court House Drive
Ellicott City, Maryland 21043-4392

Dear Mr. Farragut:

Attached as you requested is a copy of the Phase II Archeological Report for the Simpsonville Mill site located in the vicinity of Cedar Lane and MD 32.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Louis H. Ege, Jr.', written over the typed name.

Louis H. Ege, Jr.
Deputy Director
Office of Planning and
Preliminary Engineering

LHE:CDS:cd
Attachment
cc: Ms. Cynthia D. Simpson ✓
Dr. Ira Beckerman

My telephone number is (301) 333-1130

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W. Glass
PROJECT DEVELOPMENT
JUN 28 1 14 PM '92
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DEPARTMENT OF RECREATION AND PARKS

Jeffrey A. Bourne, Director

June 24, 1992

Mr. Louis H. Ege, Jr., Deputy Director
Office of Planning and Preliminary Engineering
State Highway Administration
707 North Calvert Street
Baltimore, MD 21203-0717

RE: Relocated Maryland Route 32
from Pindell School Road to
Maryland Route 108

Dear Mr. Ege:

This office has coordinated with the Howard County Department of Planning and Zoning, and the Department of Public Works to respond to the four issues presented in your letter dated March 27, 1992 as follows:

1. **Acceptability of the proposed replacement land:** This Department supports the proposal to provide .138 acres of replacement land between existing and relocated Cedar Lane as parkland mitigation for the taking of .138 acres of Program Open Space funded land north of Mill Road. This replacement land will provide additional protection for the Middle Patuxent watershed and assist the County in making a future greenway link between the Middle Patuxent Environmental Area and the Gorman Stream Valley Protection Area. It should be noted that this conversion and replacement of parkland will require State approval in accordance with Section 5-906(e)(7) of the Natural Resources Article, Annotated Code of Maryland, 1974. If this replacement parcel is unacceptable to DNR, other recommended parcels were submitted to Wes Glass on March 10, 1989.
2. **Incorporation of the Simpsonville Stone Ruins site into the Middle Patuxent Environmental Area and the Department of Recreation and Parks' role therein as outlined in the draft MOA:** The Department of Recreation and Parks will engage a consultant in the near future to prepare a master plan for the Middle Patuxent Environmental Area. The consultant will be encouraged to incorporate a trail connection to the Mill site to allow for historic interpretation to be programmed by our Department. The design and development of such a trail will be contingent upon site conditions, environmental and fiscal constraints typical of any park project.

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Mr. Louis H. Ege
Page 2
June 24, 1992

This Department concurs with the references in the MOA to public interpretation of the Mill site in conjunction with the overall program for the Middle Patuxent Environmental. It is our understanding that all structures and portions of the Mill site within the SHA right-of-way for Cedar Lane will be maintained by the State Highway Administration. These structures include, but are not limited to a structure foundation (Feature 3) and the Mill ruins (Feature 1) which are referenced in the last complete paragraph of Appendix page B-3. To clarify the County role regarding these structures, please revise the following statement:

From:

SHA will cooperate with the Howard County Department of Recreation and Parks, which has preliminarily agreed to make these features an integral part of the proposed park to preserve and protect the archeological site.

To:

SHA will cooperate with the Howard County Department of Recreation and Parks, which has preliminarily agreed to make these features an integral part of the Environmental Area's interpretation program and to preserve and protect those portions of the archeological site on County owned land.

(/)

3. Md. 32 mainline alternates (No-Build, Northern Shift, Southern Shift and Selected)

- No Build Alternate - as indicated in the FEIS document, this alternate perpetuates and compounds congestion and the high accident rate associated with Route 32 in this area.
- Northern Shift - this alternate would require 4 acres of land from the Middle Patuxent Environmental Area and sever an additional 15 acres from the remainder of the park. For that reason, along with the sediment and erosion impacts to the River during construction, this alternate should be avoided.
- Southern Shift - given the fact that the Southern Shift of the mainline would require adoption of Cedar Lane Alternate 2 this Department finds this Alternate to be unreasonable. This proposal would require 5.8 acres of the Environmental Area and segment 14.8 acres from the remainder of the park. The environmental and fiscal impacts of this alternate would be too prohibitive.

Selected Alternate - this Department supports the mainline selected alternate because of its minimal impact to the Middle Patuxent Environmental Area and its reduced impacts to the River compared to the above alternates.

4. Cedar Lane Interchange Alternates (No-Build, Partial Interchange, Alternates 1-4, and the Eastern Total Avoidance Alternate).

No-Build - this Department concurs with the statements in the FEIS which deem this alternate as unreasonable.

Partial Interchange Alternate - inconsistent with the Howard County General Plan and creates additional traffic problems on Guilford Road and Mill Road.

Alternate 1 (preferred) Although the preferred alternate impacts the Simpsonville archeological site, it requires the least disturbance of land area compared to the remaining alternates, thereby having the lowest erosion and sedimentation potential. It is also less detrimental to the Environmental Area compared to Alternates 2 and 3.

Alternates 2 and 3 - The Department strongly objects to these Alternates based on their impacts to the Middle Patuxent Environmental Area and the increased potential for erosion and sedimentation in the watershed.

Alternate 4 - Although this alternate avoids the Mill site and the Middle Patuxent Environmental Area, except for the minimal impacts of the North Service Road, the loss of woodlands and additional grading pose a greater threat to the environment and water quality of the Middle Patuxent than preferred Alternate 1. The displacement of residences and increased cost compound the problems associated with this alternate.

Eastern Total Avoidance Alternate - The increased grading and bridge construction near the River for relocated Cedar Lane make this alternative very undesirable from an environmental vantage point.

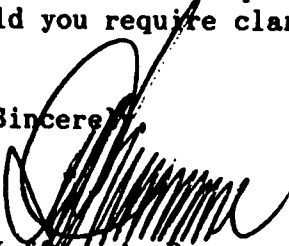
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Mr. Louis Ege
Page 4
June 24, 1992

In addition to this Department's comments above, we have enclosed the comments of the Department of Planning and Zoning and the Department of Public Works.

We trust that this information addresses all questions outlined in your March 27, 1992 correspondence. Should you require clarification or additional information, please advise.

Sincerely,



Jeffrey A. Bourne
Director

JAB/KMA/db

enclosures:

05/14/92 Memo Irvin to Bourne
05/15/92 Memo Rutter to Bourne

cc: Raquel Sanudo
James Irvin
Joseph Rutter
Wesley Glass
Ronald Rye

Howard County

Internal Memorandum

Subject: Relocated Maryland Route 32
Pindell School Road to Route 108
Draft Supplement 4(F) Evaluation

TO: Jeffrey A. Bourne, Director
Department of Recreation and Parks

FROM: James M. Irvin, Director
Department of Public Works

DATE: May 14, 1992

RECEIVED

MAY 15 1992

DEPT. OF RECREATION AND PARKS
COLUMBIA CITY MARYLAND

The Department of Public Works has reviewed the March 27, 1992 Draft 4 (F) document forwarded by the State Highway Administration concerning the preferred alignment of Relocated Maryland Route 32 at Cedar Lane and its effects on the Simpsonville Stone Ruins.

This draft document is acceptable due to the following reasons:


1. The preferred alignment is consistent with the 1990 General Plan and Capital Project J-4086 II (Cedar Lane). The preferred alignment is consistent also with previous County funded alternate studies for Cedar Lane under Capital Project J-4003 and was supplied to the State Highway Administration.
2. While the preferred alignment does affect some ruins and wetlands, it is cost effective and provides for optimum roadway safety. It requires no stream location with no business acquisition and no additional home acquisitions (one is owned by the State Highway Administration).
3. The bridge selection of option 5 appears to provide for a future river trail and the preservation of most of the ruins. Part of the existing bridge arch will remain to allow pedestrian passage.

In summary, this Department concurs with the conclusions of the State Highway Administration document and supports the SHA's selected alignment for Maryland Route 32 and preferred alternate (No. 1) for the Cedar Lane Interchange. We will continue to cooperate with the SHA in the integration of the County's and State's projects.

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Page 2
May 14, 1992

If you require any further information concerning this matter or have any additional questions, please do not hesitate to contact me at your convenience.


James M. Irvin

JMI/ss

cc: William E. Riley
Elizabeth Calia
Capital Project J-4086
Maryland Route 32
John Leslie, SHA

RECEIVED

MAY 26 1992

DEPT. OF RECREATION AND PARKS
COTT CITY, MARYLAND

121

Howard County
Internal Memorandum

Subject: Relocated Maryland Rt 32
Pindell School Road to Rt 108

TO: Jeffrey A. Bourne, Director
Department of Public Works

FROM: Joseph W. Rutter, Jr., Director
Department of Planning and Zoning

DATE: May 15, 1992

I am writing in response to your memorandum of April 28, 1992 to Jim Irvin and me requesting comments on the Draft Supplemental 4 (f) Evaluation for various alignments of MD 32 Relocated at Cedar Lane. Following are the comments from this Department addressing transportation network, historical/archaeological and environmental issues relative to the proposed alternate alignments.

A. Transportation Network Comments

1. Mainline Alternates

- a. Northern Shift - This proposed alignment, as depicted in Figure 2, veers radically from the existing MD 32 alignment and is substantially costlier in both monetary and environmental terms than the Preferred Alternate 1 depicted in Figure 3. This alternate would isolate sections of the W. R. Grace Laboratories and the Middle Patuxent Environmental Area from the main parcels, restricting future full development in the former and highest use in the latter. Therefore, any long-term future expansion or improvements to the infrastructure would also be more costly and difficult given the cost and environmental characteristics of the impacted terrain. As well, the additional \$22 million cost for this alternate including the interchange appears to be prohibitively costly and would be more cost-effective if budgeted for other major transportation infrastructure needs in the County.
- b. Southern Shifts - The two southern shifts of the proposed relocated MD 32, while not as radical or costly as the Northern Shift, would nevertheless be substantially (\$7 million) more expensive than the Preferred Alignment due to the cost of the interchange.
- c. No-Build Alternate - As indicated in the FEIS document, the lack of traffic capacity and subsequent operational problems associated with this alternate would result in gridlock in the MD 32 corridor and diversion of traffic causing overloading of nearby facilities; e.g., the US 29/Broken Land Parkway and US 29/Seneca interchanges. This alternate would also be inconsistent with the 1990

General Plan.

2. Interchange Alternates

- a. **No-Build Alternate** - This alternate is inconsistent with the 1990 General Plan, and would result in serious operational problems on existing Guilford Road and other interchanges (e.g., Village of River Hill, Clarksville) along Relocated MD 32 as traffic movements shifted west to obtain access. Additionally the interchanges at Broken Land Parkway and at Seneca Drive, as well as local collector and residential streets would be impacted by vehicles desiring access to the Villages of Harpers Choice and Hickory Ridge.
- b. **Partial Interchange Alternate** - The absence of a ramp from Cedar Lane to westbound MD 32, as proposed with this alternate, would result in serious capacity problems on Guilford Road west of Pindell School Road and at the proposed Clarksville and River Hill interchanges. Additionally, Mill Road, which is slated to be a through road built to local road standards, would likely experience serious congestion problems and result in unacceptable levels of traffic throughout the residential areas of the Village of River Hill (VRH), Section 2. This increase in through traffic demand would be likely to cause increased demand for the VRH interchange with MD 32.
- c. **Alternate 2 - Western Total Avoidance Alternate** - This interchange alternate northwest of the Preferred Alternate, would essentially have the same capacity as the Preferred Alternate, but would be more costly and have more significant environmental impacts. This is the only interchange alternate designed to be viable with the Southern and Northern Shifts of the mainline alternates, however, resultant costs are substantially higher than the Preferred Alignment with the Alternate 1 interchange.
- d. **Alternate 3 - Western Partial Avoidance Alternate** - This interchange alternate would have similar capacity to the Western Total Avoidance and the Preferred Alternates, but would be more costly than the latter.
- e. **Alternate 4 - Eastern Partial Avoidance Alternate** - This interchange alternate, located to the southeast of the Preferred Alternate 1, would require new bridge construction for relocated Cedar Lane over the Middle Patuxent River but would substantially avoid both the archaeological district and the Middle Patuxent Environmental Area. The traffic capacity of this alternate does not appear to differ substantially from the other interchange alternates, but costs due to new bridge construction and relocated Cedar Lane are higher than the Preferred Alternate.

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3. Recommendation

Alternate 1, the Preferred Alternate, for both the interchange and mainline, appears to be the most cost effective and presents the best option for future expansion if necessary. There currently exists a critical need for grade-separation at the MD 32/Cedar Lane/Pindell School Road intersection, and the problem will soon be compounded with the development of the Village of River Hill. The depicted Mainline and Interchange Alternates, while slightly reducing the impact of the project on the Simpsonville Stone Ruins Archaeological District, do not provide additional capacity or improved traffic operations. Additional engineering and planning for this project will only serve to delay the completion of this project.

This Department believes that from a transportation network perspective, the higher construction costs, associated with the proposed Interchange and Mainline Alternates are not warranted based on the marginal reduction to impacts to the Simpsonville Stone Ruins Archaeological District.

If Preferred Alternate 1 is for some reason ultimately not considered viable, Alternate 4 appears to be the next most cost effective alternate. Alternate 4 could be constructed in conjunction with the Preferred Mainline Alternate, thereby avoiding costly northern or southern shifts of the mainline.

B. Environmental Comments

In the absence of field work, a review of the environmental impacts summarized in the Draft Supplemental 4(f) Evaluation indicates that for most measures of environmental impact, floodplains, wetlands and woodlands, all four proposed alternatives have minor effect. The amount of stream relocation and encasement, however, differs dramatically among the alternatives, ranging from 0 (Alt. 1) to 1,400 feet (Alt. 2).

In order to avoid the archaeological district, Alternatives 2, 3 and 4 must all deviate broadly from the existing roadbed and alignment, creating the potential for greater erosion and sedimentation during the construction of the interchange. Alternative 1, therefore, seems to present the least environmental impact, both during and after construction. If, for some reason, Alternative 1, the Preferred Alternative, could not overcome archaeological obstacles, then from an environmental point of view, Alternative 4 appears to be the most acceptable choice of those presented because of the relatively small (50 linear feet) of stream length that must be relocated and encased.


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C. Historical Preservation Comments

Upon review of the draft Supplemental Environmental Impact Statement and the draft Memorandum of Agreement for Alternate 1 between the State Highway Administration (SHA), the Maryland State Historic Preservation Office (SHPO), and the Federal Highway Administration (FHWA), we feel comfortable that the impacts to the historic and architectural resources by the construction of this roadway will be effectively mitigated. It is requested that copies of all reports on the historic and archaeological resources prepared by SHA on the Simpsonville Mill Ruins for the State Historic Preservation Office and adjacent property owners be sent to the Department of Planning Zoning.

The report and Memorandum of Agreement demonstrate that a great deal of effort is being made to protect a valued part of Howard County's agricultural heritage.

Should you have questions or require additional information in this regard, please contact Carl Balsler at extension 2357.


Joseph W. Rutter, Jr.

JWR, JR/BRM:sg/JefBourn.mem

- cc: Raquel Sanudo, Chief Administrative Officer
- James Irvin, Director, Dept. of Public Works
- Marsha McLaughlin, Deputy Director, Dept. of Planning & Zoning
 - to: Mina Hilsenrath, Chief, Div. of Community Planning and Land Development
 - Carl Balsler, Chief, Div. of Comprehensive & Transportation Planning
 - to: Benjamin Pickar, Div. of Comprehensive & Transportation Planning
 - to: David Holden, Div. of Comprehensive & Transportation Planning
 - to: Alice Ann Wetzel, Historic Preservation Planner
 - to File: Roads/MD 32

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**RESPONSES TO HOWARD COUNTY DEPARTMENT OF
RECREATION AND PARKS**

1. This wording has been placed in Section 6C of the 4(f) Evaluation.

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United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

L76(774)
ER-92/0599

AUG 24 1992

Mr. A. Porter Barrows
Division Administrator
Federal Highway Administration
711 West 45th Street, Suite 220
Baltimore, Maryland 21211

Dear Mr. Barrows:

This is in response to the request for the Department of the Interior's comments on the supplemental draft Section 4(f) evaluation for SR-32 (from SR-108 to Pindell School Road), Howard County, Maryland.

SECTION 4(f) STATEMENT COMMENTS

We concur that if transportation objectives are to be achieved, there is no feasible and prudent alternative to the use of, and impact on, the park and recreation areas and some of the historic sites.

From the perspective of the second proviso of Section 4(f), measures to minimize harm, we find that Alternative 1, the preferred alternative, would have the least impact on the Section 4(f) areas. We also concur that mitigation measures are appropriate for the Middle Patuxent Environmental Area including leaving the original arch portion of the existing bridge to provide pedestrian access and accommodating a planned trail under the proposed bridge for Cedar Lane as noted on pages 3 and 11, respectively. Coordination and consultation should be pursued with the Howard County Department of Recreation and Parks for replacement and/or compensation for the land to be taken from the park for project proposes. To maintain the resource base, we recommend that the land taken be replaced with land of reasonably equivalent park utility and location. Should suitable replacement lands not exist, compensation tendered should be placed in an escrow or similar park account for capital improvements to enhance the public's opportunities on the residual lands. Should access to the Patuxent River be needed and would be suitable, consideration might be given for the provision of a public canoe or boat launching area in accordance with Section 147 of the Federal Highway Act of 1976, as amended. This possibility should be explored with the County Recreation and Parks Department.

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We also recommend continued coordination and consultation with the Maryland State Historic Preservation Officer regarding the archeological research design, the architectural investigation and the measures to be implemented for the protection and preservation of potential unrecorded resources within the selected alignment. The final document should include documentation of consultation and that agency's concurrence with the project plans.

SUMMARY COMMENTS

The Department of the Interior offers no objection to Section 4(f) approval of Alternative 1, the preferred alternative, provided the measures mentioned above are included and documented in the final statement.

As this Department has a continuing interest in this project, we are willing to cooperate and coordinate with you on a technical assistance basis in further project evaluation and assessment. For matters pertaining to recreational and cultural matters, please contact the Regional Director, National Park Service, Mid-Atlantic Region, 143 South Third Street, Philadelphia, Pennsylvania 19106 (telephone: (215) 597-7013).

Thank you for the opportunity to provide these comments.

Sincerely,

Jonathan P. Deason
Jonathan P. Deason
Director
Office of Environmental Affairs

✓
cc:
Mr. Neil J. Pedersen
Director, Office of Planning and
Preliminary Engineering
Maryland Department of Transportation
707 North Calvert Street
Baltimore, Maryland 21203-0717

Mr. J. Rodney Little
Executive Director Historical and
Cultural Programs
Department of Housing and Community Development
Peoples Resource Center
100 Community Place
Crowsville, Maryland 21032-2023

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**RESPONSES TO U.S. DEPARTMENT OF
THE INTERIOR COMMENTS**

1. Alternate 1 has been selected.
2. Howard County supports the proposal to provide 0.138 acre of replacement land between existing and relocated Cedar Lane. (See letter from Howard County Department of Recreation and Parks to Mr. Louis Ege, Jr. dated June 24, 1992, in this Appendix).
3. The concurrence of the State Historic Preservation Officer, the Federal Highway Administration and the Advisory Council on Historic Preservation with the project plans is indicated by their signatures on the Memorandum of Agreement in this Appendix.