

DRAFT

# 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

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

FEDERAL HIGHWAY ADMINISTRATION  
REGION III

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

ADMINISTRATIVE ACTION

DRAFT 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

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- Correspondence with Maryland Historical Trust
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- Correspondence with Howard County

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**Draft 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 Road/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 currently under construction 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. Based upon coordination with the Federal Highway Administration and the State Historic Preservation Officer, the Simpsonville Stone Ruins site is now thought to be eligible for the National Register of Historic Places and valuable as an archeological district as well as for the data it contains.

The purpose of this evaluation is to document the impacts on the Simpsonville Stone Ruins site 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)**

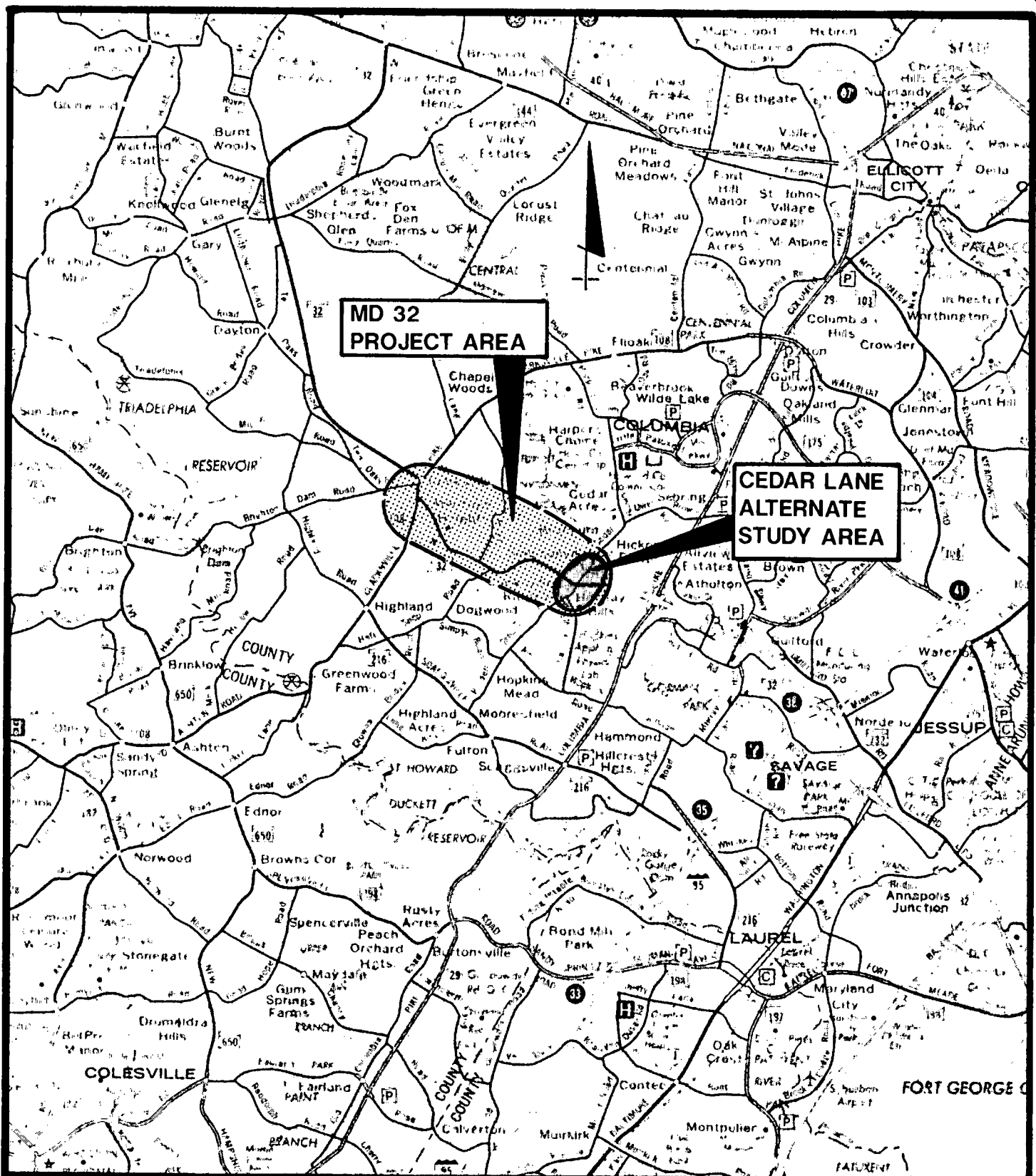
The Selected Alternate was designated Alternate B in the SFEIS/4(f) (p. II-3). Although minor refinements have been made during the final design phase, the final construction plans do not differ significantly from Alternate B as shown in the SFEIS.

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.

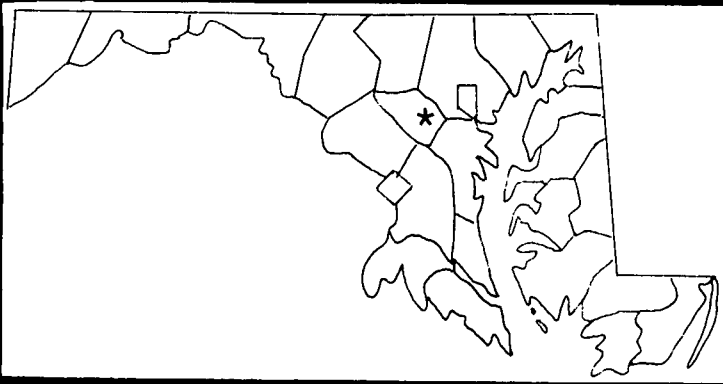
c. **MD 32/Cedar Lane Interchange Preferred Alternate (See Figure 3)**

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  
PROJECT AREA**

**CEDAR LANE  
ALTERNATE  
STUDY AREA**



**MD 32 / CEDAR LANE INTERCHANGE**

**LOCATION MAP**

DATE  
MAR. 12, 1992

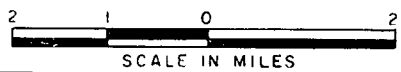


FIGURE  
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the existing bridge, in a northerly direction over the Middle Patuxent River. Approximately 950 feet north of the river, the alignment ties into the Cedar Lane improvements recently constructed by Howard County. The new structure over the 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 Preferred 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 7 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.<sup>1</sup> 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 Cocksville in Howard County and the City of Annapolis in Anne Arundel County.

<sup>1</sup> 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.

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

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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 are 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 Stone Ruins 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 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.

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

- 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.

It should be noted that few of the features remain standing; rather the remaining ruins reflect the original organization of the milling community and provide the opportunity for investigation of such communities.

The SHPO has determined that the proposed action will adversely affect the Archeological District.

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 proposed action will adversely affect the site's setting.

The proposed District, shown on Figures 2 and 8, 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. 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 8 (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 archeologically significant features.

**b. Middle Patuxent Environmental Area (See Figure 9 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.

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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.

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 9). 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 Stone Ruins within the Environmental Area into the master plan for the Area. (See 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 Ruin Archeological District as outlined in the MOA in the Appendix.



4. Description of Impacts of Preferred Alternate (See Figures 3 and 8)

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 Mill*	F2 Headrace
F11 Possible sawmill	F3 Structural foundation*
F12 Waste race	F4 General Store
F13 <sup>a</sup> Pre-1949 road alignment	F9 Concrete floodgate
F23 <sup>c</sup> Wheelwright location*	F17 <sup>b</sup> Structural foundation*
F28 <sup>d</sup> Blacksmith location	F18 Mill path
F30 <sup>e</sup> Structural foundation	F22 Concrete lined pit (Part of F1)
F47 Tailrace	F25 Magnetic anomaly*
	F31 Possible pavement (Part of F25)
	F32 Possible trench (Part of F25)
	F35 Wheelpit
	F36 Wheelpit dam

\* Considered to be the most archeologically significant features

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

b 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.

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- c A portion of F23 will be impacted by the roadway slopes; the undisturbed portion of the site will be protected with fencing during construction. The adverse effects will be mitigated through data recovery.
  - d F28 is currently highly disturbed; however, any data recovery possible will be made through the Phase III Archeological Survey.
  - e The impacts to F30 occur on the periphery of the feature. Mitigation will be effected through data recovery.

Except for F1, the mill, (and F33, the Owings-Myerly House discussed above) all the impacted features are surface or subsurface remnants of previous structures.

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. This will require removing the upper portion of the remaining walls in the west corner of the feature.

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.

**b. Middle Patuxent Environmental Area**

The Preferred Alternate will require 1.91 acres of the 1046 acre 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 1.79 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.

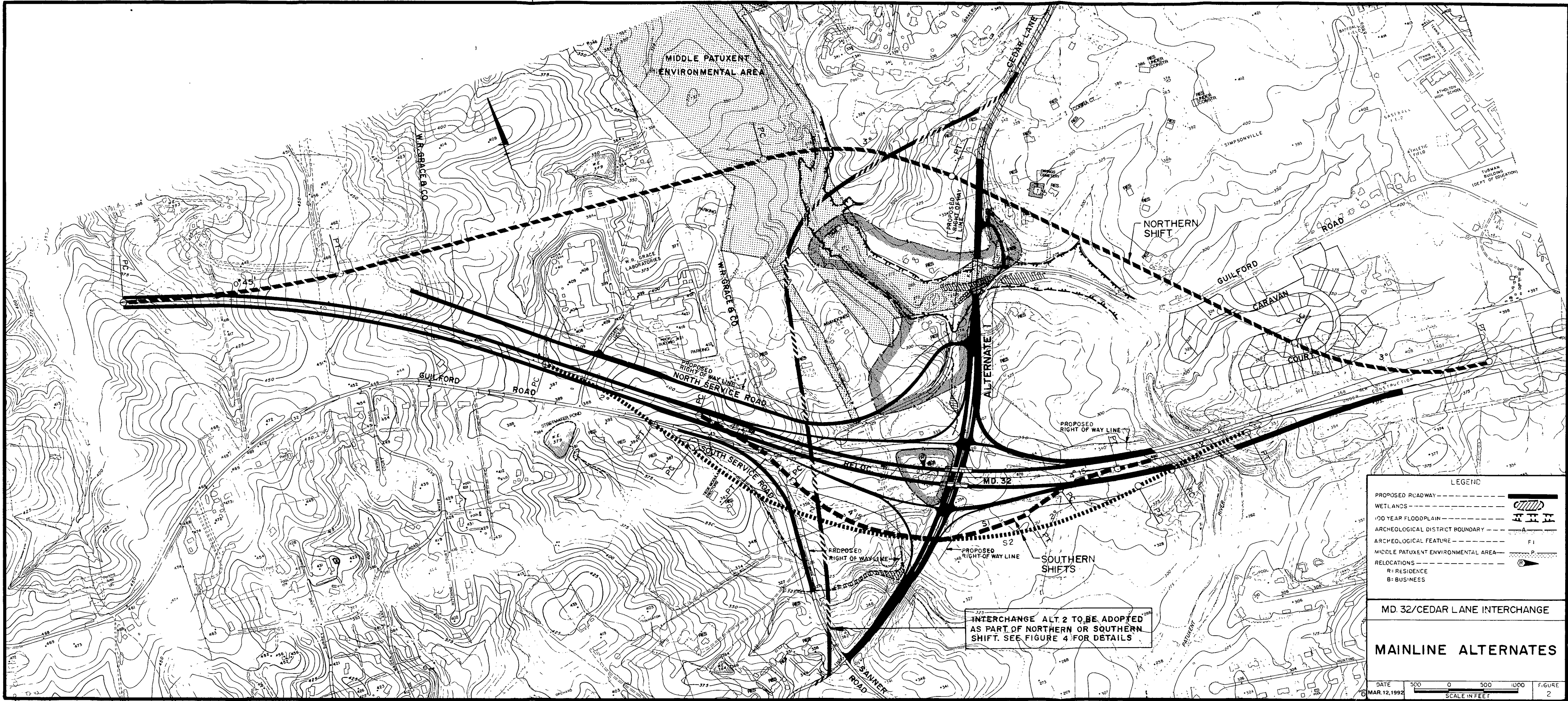
Mitigation of the project's impacts on the Middle Patuxent Environmental Area is discussed in the SFEIS (p. IV-26).

**c. Engineering/Environmental**

Both the MD 32 mainline and Cedar Lane follow existing roadway corridors under the Preferred 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 Preferred 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 Preferred 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 no businesses will be displaced. A new road will not be placed any closer to a residence than an existing road.



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: 0, 500, 1000

FIGURE: 2



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	62,000

MD 32/CEDAR LANE INTERCHANGE

**ALTERNATE 1**  
PREFERRED ALTERNATE

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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.

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.

**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.
- 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.

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.
- 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).

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- 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 Preferred 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 Scholl 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.

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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 Preferred Alternate, Alternate 2 would have a substantially greater impact on the natural environment. A tabulation of the natural environmental impacts of the Preferred Alternate and Alternate 2 is include 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 Preferred 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 Preferred 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.

vi. Eastern Total Avoidance Alternate

Consideration has been given to complete avoidance of both the Middle Patuxent Environmental Area and the Simpsonville Stone Ruins Archeological District. As concluded in the SFEIS, there is no feasible and prudent alternative that completely avoids the Middle Patuxent Environmental Area. To completely avoid the Archeological District, Relocated Cedar Lane would have to be shifted further eastward than shown on Figure 6 for Alternate 4, requiring two sharp curves on Pindell School Road south of MD 32 and supplemental bridges to carry the ramps on the east side of the interchange over the Middle Patuxent River. Not only would this substantially increase the cost of the project (\$1,750,000 for the bridges alone, which does not include the increased roadway costs due to the increased length of Relocated Cedar Lane), it would also place 1200'+ of Relocated Cedar Lane parallel to and within 400'+ of the river, on slopes ranging from 12% to 35%, with a greater potential for sediment deposits in the river.

As a result of the greater natural environmental impact, undesirable geometrics, and additional cost, this alternate is not considered to be reasonable.



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

DATE: MAR. 12, 1992

SCALE IN FEET: 0 200 400

FIGURE 4



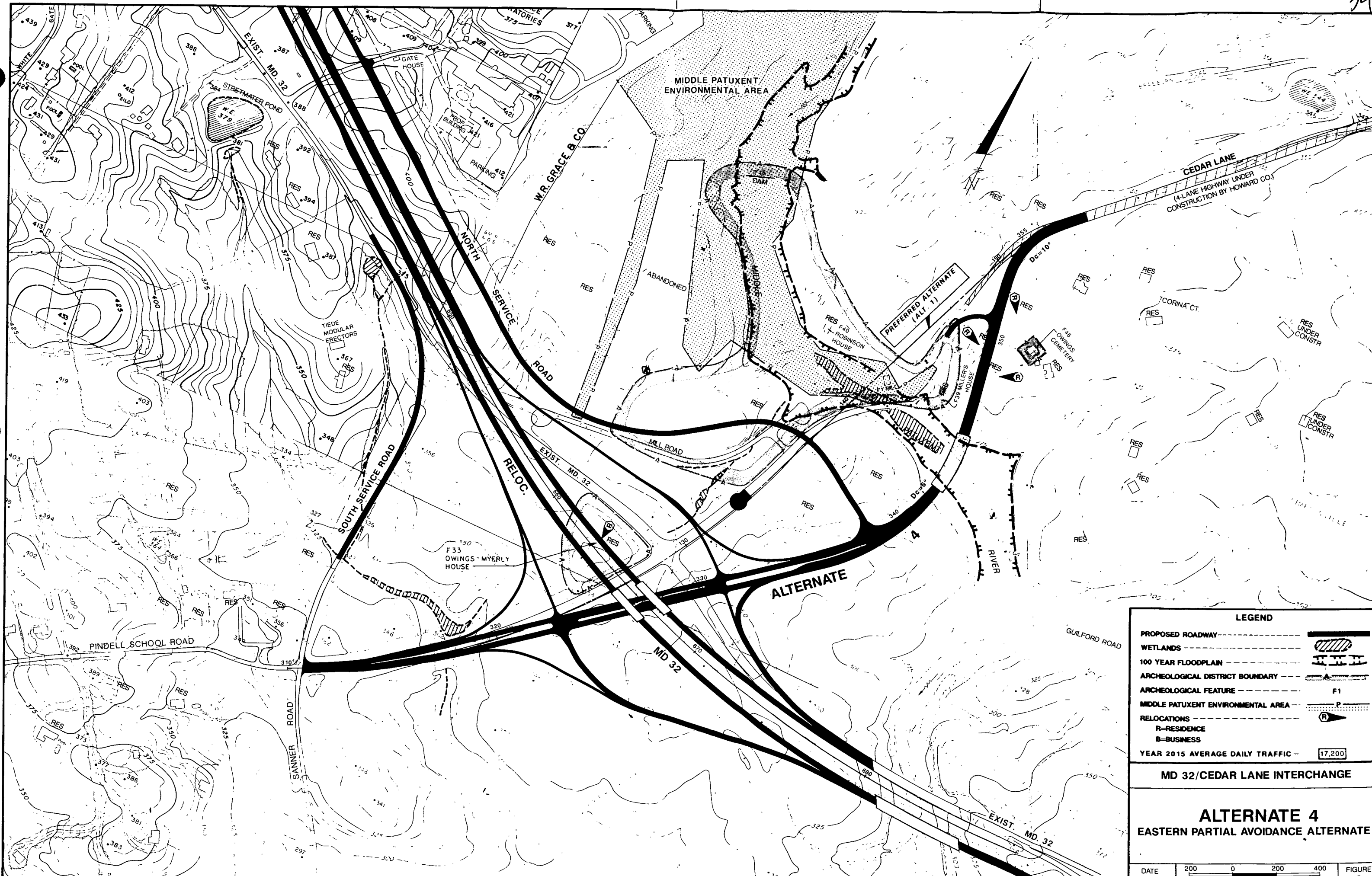


LEGEND	
PROPOSED ROADWAY	
WETLANDS	
100 YEAR FLOODPLAIN	
ARCHEOLOGICAL DISTRICT BOUNDARY	
ARCHEOLOGICAL FEATURE	F1
MIDDLE PATUXENT ENVIRONMENTAL AREA	
RELOCATIONS	
R=RESIDENCE	
B=BUSINESS	
YEAR 2015 AVERAGE DAILY TRAFFIC	17,200

MD 32/CEDAR LANE INTERCHANGE

**ALTERNATE 3**  
WESTERN PARTIAL AVOIDANCE ALTERNATE

DATE	200 0 200 400	FIGURE
MAR. 12, 1992	SCALE IN FEET	5



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

MD 32/CEDAR LANE INTERCHANGE

**ALTERNATE 4**  
EASTERN PARTIAL AVOIDANCE ALTERNATE

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## 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 is being 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 MOA will be finalized and signed by all parties prior to the start of construction within the Archeological District. The principal measures set forth in the draft 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 Fl: 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 Howard County to make the Archeological District an integral part of the Middle Patuxent Environmental Area, if requested to do so by Howard County.
- 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.

7. **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 is being prepared. A draft of 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 Preferred Alternate (Alternate 1) for the Cedar Lane Interchange.

**APPENDIX**

**TABLE 1  
SUMMARY OF IMPACTS**

	<u>Alternate 1 (Selected Alt.)</u>	<u>Alternate 2 (Western Total Avoid. Alt.)</u>	<u>Alternate 3 (Western Partial Avoid. Alt.)</u>	<u>Alternate 4 (Eastern Partial Avoid. Alt.)</u>
<b>Relocated Cedar Lane:</b>				
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
<b>Archeological District<sup>1</sup>:</b>				
No. of features				
Disturbed	8	0	1	3
Area (acres)	8.72	0 <sup>2</sup>	2.36	5.70
Floodplain (Ac.) <sup>5</sup>	0.40	0.12	0.20	0.23
Wetlands (Ac.) <sup>5</sup>	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
<b>Displacements:</b>				
Residence	1	6	5	4
Business	0	1	1	0
<b>W.R. Grace &amp; Co. Property:</b>				
Area Required (acres) <sup>3</sup>	0	3.78	3.30	0
Parking (acres) <sup>4</sup>	0	0.38	0.15	0
<b>Construction Cost<sup>6</sup></b>	<b>\$8,400,000</b>	<b>\$13,200,000</b>	<b>\$11,900,000</b>	<b>\$11,900,000</b>

**NOTES:**

General - Impacts of Alternate 1, Preferred 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

ARCHEOLOGIC FEATURES WITHIN PROPOSED RIGHT OF WAY

Alternate 1 (Preferred 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 archeologically significant features.

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

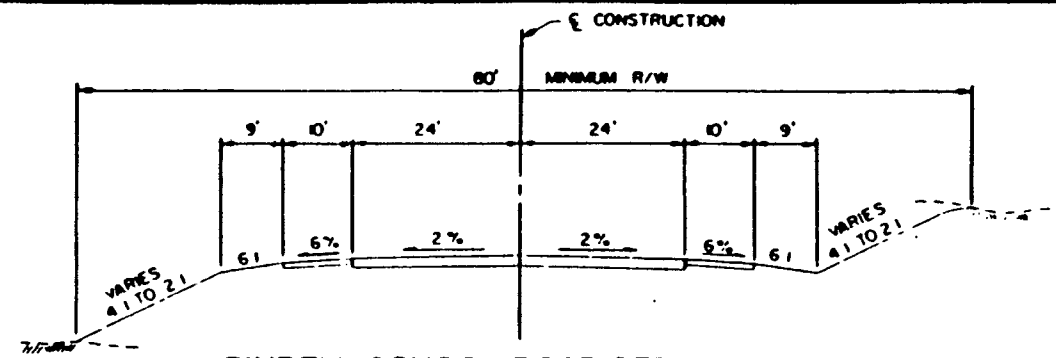


Photograph 21: South Wall of Mill. Circa 1984 (Courtesy of Lee Preston)

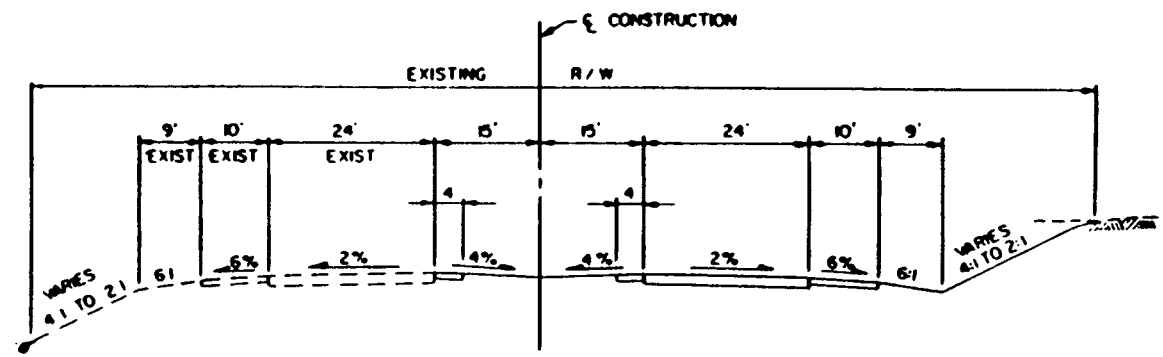


Photograph 22: South Wall of Mill in 1989

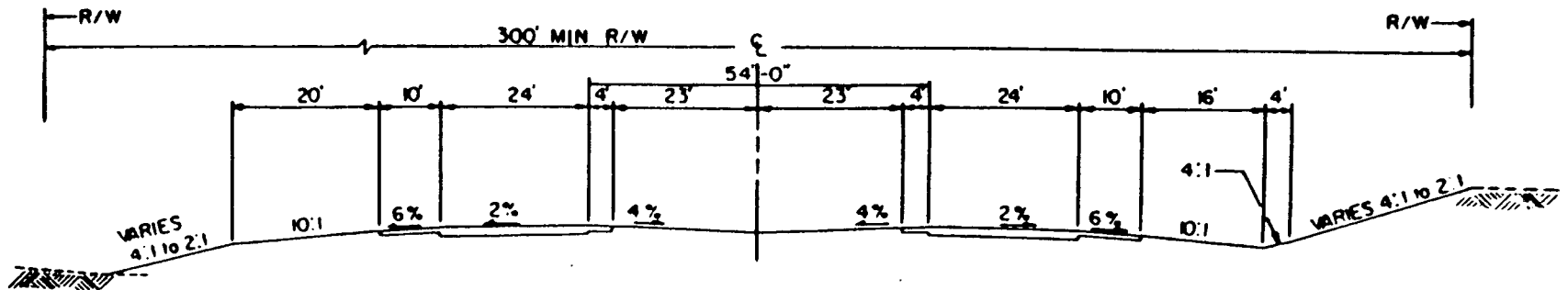
# TYPICAL SECTIONS



PINDELL SCHOOL ROAD/CEDAR LANE  
BEYOND INTERCHANGE AREA



PINDELL SCHOOL ROAD/CEDAR LANE  
THROUGH INTERCHANGE AREA



RELOCATED MARYLAND ROUTE 32

FIGURE 7

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

ALTERNATES A, B AND C

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


7/2


### 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 *   |                                      |

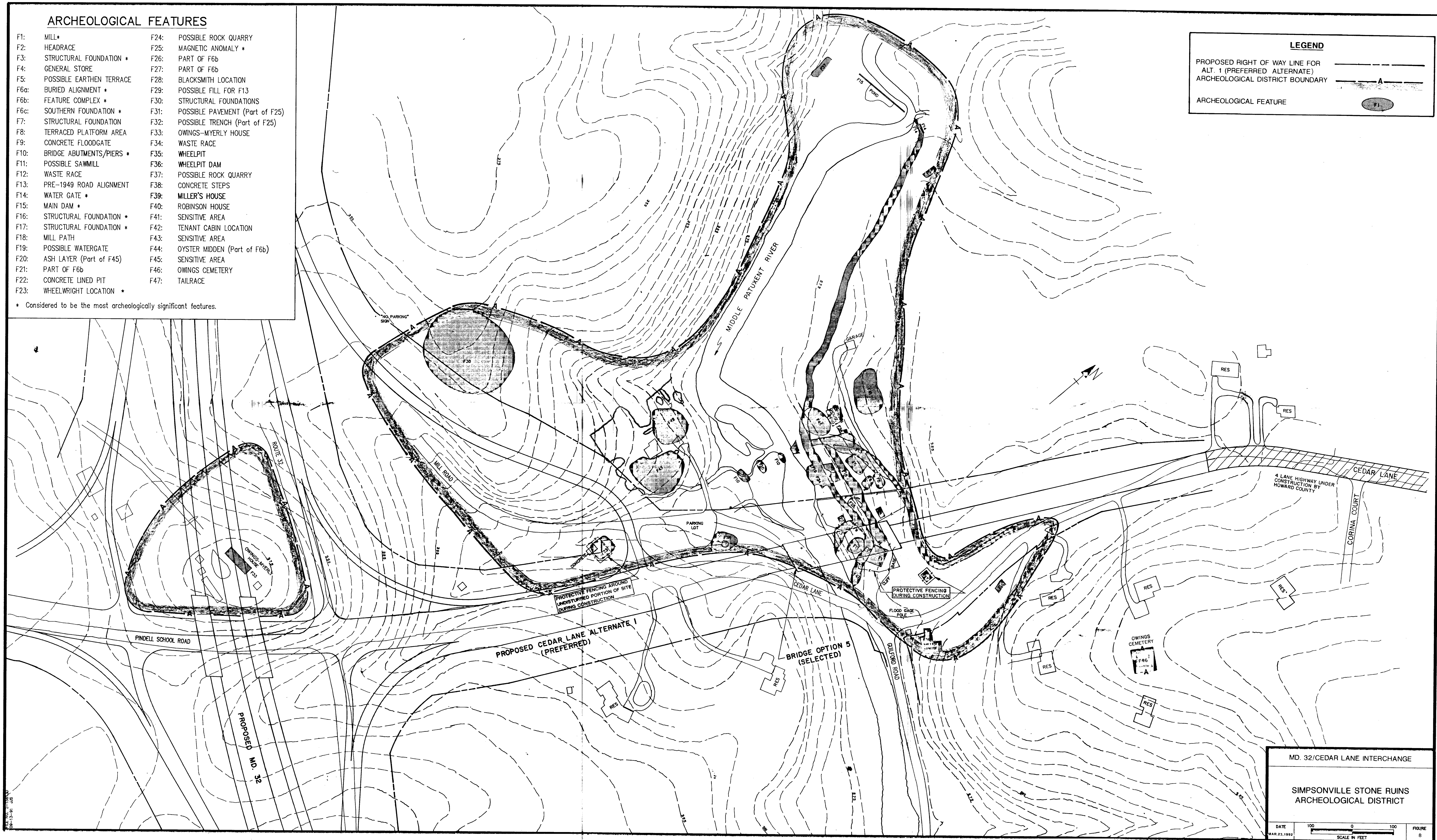
\* Considered to be the most archeologically significant features.

**LEGEND**

PROPOSED RIGHT OF WAY LINE FOR ALT. 1 (PREFERRED ALTERNATE) 

ARCHEOLOGICAL DISTRICT BOUNDARY 

ARCHEOLOGICAL FEATURE 



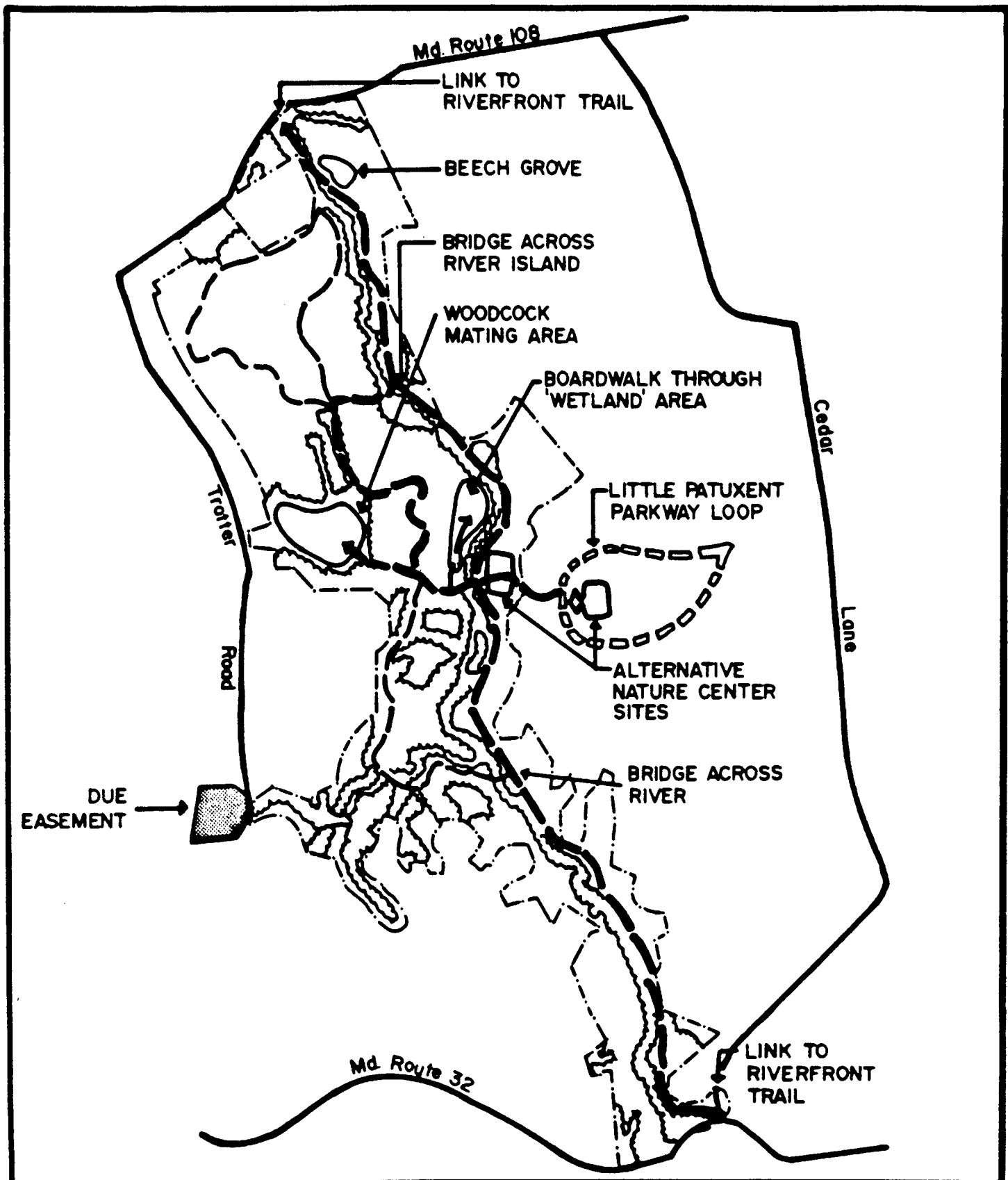
MD. 32/CEDAR LANE INTERCHANGE

SIMPSONVILLE STONE RUINS  
ARCHEOLOGICAL DISTRICT




DATE: MAR. 23, 1992

SCALE IN FEET

FIGURE 8



DUE EASEMENT

-  Primary Trail
-  Secondary Trail
-  Limit of Wooded Area

MD 32 / CEDAR LANE INTERCHANGE

MIDDLE PATUXENT ENVIRONMENTAL AREA

**PRELIMINARY CONCEPT I**

NOT TO SCALE

FIGURE 9

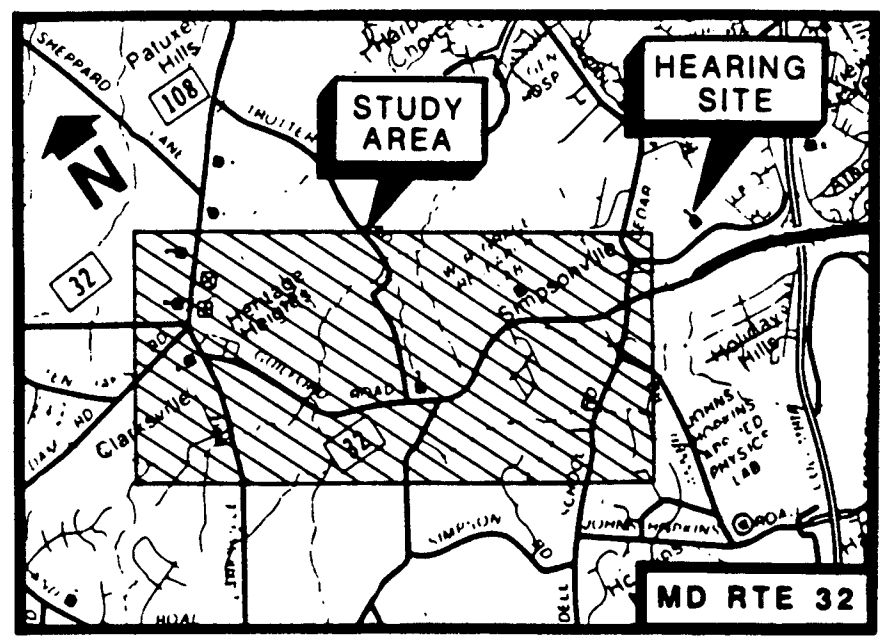


PUBLIC NOTICE  
MARYLAND DEPARTMENT OF TRANSPORTATION  
STATE HIGHWAY ADMINISTRATION

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

JUN 24 11:54 AM '88

50  
William Donald Schaefer  
Governor

Jacqueline H. Rogers  
Secretary, DHCD

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 Prof

VII-109

Ritchie Highway, Arnold, Maryland 21012

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 18HO80 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 18HO80 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, HO525, 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 HO525 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, HO165, 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, H0164, Clifton/Wellings Stone House. This historic structure is located on a tract of land potentated 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 H0158, 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 H0158 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.

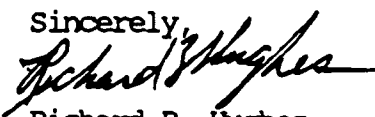
Mr. Louis H. Ege, Jr.  
June 16, 1988  
Page 4

- 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

RBH/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

54  
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  
(18HO80) and the Heritage  
Heights Site (18HO149),  
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 (18HO149) prevented a definitive determination of National Register eligibility for this resource. Phase II shovel testing and unit excavation at 18HO149 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  
Page 3

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  
Page 4

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.
- 8

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Mr. Louis H. Ege, Jr.  
Deputy Director  
June 7, 1990  
Page 5

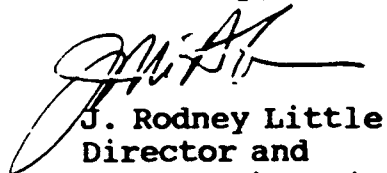
2) The argument for important historical information about the theme of transportation is too weak, given that location is cited as the major justification.

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

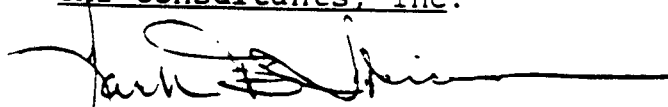
Dear Dr. Beckerman:

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

JB I:jbi  
cc:Cynthia Simpson  
enclosure

## National Register Evaluation

GAI Consultants concludes that the Simpsonville Site (18H080) 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.

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

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

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.

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- (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).

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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

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 (18HO80) 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.

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William Donald Schaefer  
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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  
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The Trust believes that mitigation of effects on 18HO80'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 18HO80 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

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.

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Ms. Cynthia Simpson  
October 23, 1990  
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#### FIELD MEETINGS

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

#### DELIVERABLES

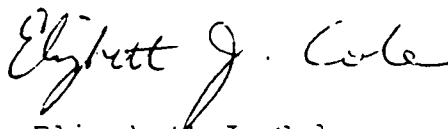
The report should contain a strong, well-prepared section on management recommendations for those sections of 18H080 that will not be destroyed. This part of the scope also might require the consultant to develop some form of public interpretation, including--if feasible--an on-site open house.

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



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*  
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

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November 30, 1990

Ms. Cynthia D. Simpson  
Assistant Division Chief  
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707 North Calvert Street  
Baltimore, MD 21203-0717

Re: Scopes of Work, Simpsonville  
Stone Ruins (18HQ80), 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 (18HQ80). 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.

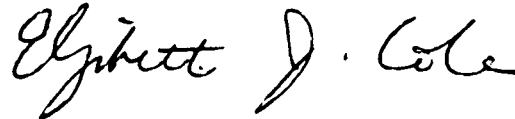
We appreciate this opportunity to comment. The scopes of work, with the implementation of our suggestions and the execution of the Memorandum of Agreement (MOA), will provide a sufficient level of effort for the mitigation of adverse effects to 18HO80 through: background research; photographic and other 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,

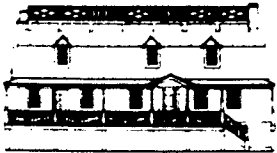


Elizabeth J. Cole  
Administrator  
Archeological Services  
Office of Preservation Services

FJC/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

Nov 3 3 55 PM

40  
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  
(18H080), 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

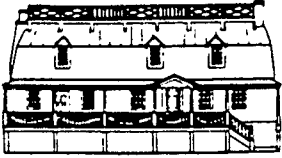
EJC:lld

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  
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TRUST

81  
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

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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.

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 18HO80, 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?

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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,

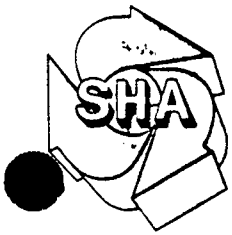


Elizabeth J. Cole  
Administrator  
Archeological Services  
Office of Preservation Services

Enclosures

EJC/GDS

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



**Maryland Department of Transportation  
State Highway Administration**

85  
O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

August 5, 1991

**Memorandum:**

To: Cynthia Simpson  
Assistant Division Chief  
Project Planning Division

Attn: Mr. Wesley Glass

From: Richard Ervin *RE*

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

8/2

#Feature 30	residence	architecture, cultural landscape, and community society and culture
*Feature 33	Owings - Myersly House	architecture, cultural landscape, 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

MARYLAND  
HISTORICAL



TRUST

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



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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.

Concurrently with the archeological investigations, SHA architectural historians will complete the recordation of historic standing structures on the property. This work will include preparation of a Maryland Inventory of Historic Properties Form for the Robinson House (6692 Cedar Lane); additionally, existing background data will be utilized to augment information in existing Maryland Inventory of Historic Properties forms for the Owings-Myerly House (HO-165) and the Hatfield Residence (HO-268). Exterior photographs of the three historic structures will be provided. If possible and appropriate, interior and exterior sketch plans and interior photographs will be prepared for those



structures for which admittance is granted by the property owner. The SHA will contact property owners 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 1 month before the Bid opening 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 to obtain concurrence that construction can begin within the site area.

C. Reporting

SHA will submit the draft report on the archeological data recovery plan and the draft architectural inventory forms 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 inventory forms. SHA will provide copies of all final reports and inventory 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 (18H080)," 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: \_\_\_\_\_ Date: \_\_\_\_\_  
Robert D. Bush, Executive Director

FEDERAL HIGHWAY ADMINISTRATION

By: \_\_\_\_\_ Date: \_\_\_\_\_  
\_\_\_\_\_ Division Administrator

MARYLAND STATE HISTORIC PRESERVATION OFFICER

By: \_\_\_\_\_ Date: \_\_\_\_\_  
J. Rodney Little, State Historic  
Preservation Officer

MARYLAND STATE HIGHWAY ADMINISTRATION

By: \_\_\_\_\_ Date: \_\_\_\_\_  
Hal Kassoff, Administrator

## Appendix B

Plan for Auxiliary Site Treatment: Simpsonville Stone Ruins  
(18H080)

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 (18H080). 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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After completion of the proposed bridge construction, the preserved feature, with the lower portions of its stone walls intact, would remain as a visual representation of the milling industry.

During construction, the same fencing will protect all other features within the portion of the proposed right-of-way crossing the river floodplain, except as described below. The fencing would protect structural Features 3,5, and 6; midden Features 6 and 25; the millpath (Feature 18); water diversion Features 2, 9, 36, 35; and the part of water diversion Feature 12 where a magnetic anomaly was recorded.

The only other features on the Patuxent floodplain that will be directly impacted by bridge construction are Feature 47 (waste race); the southern end of Feature 12 (Waste race); Feature 4 (store); and Feature 11 (possible sawmill location). Feature 11 and the southern part of Feature 12 are under the footprint of the bridge pier. Feature 47 will be affected by movement of heavy equipment needed to construct the bridge pier. Data recovery investigations will be undertaken at the three features to mitigate the effects of construction. Furthermore, Feature 47 will be substantially protected during construction by backfilling with soil and covering with heavy mats.

SHA will ensure that particular care is taken during construction to avoid impacts to the fenced features. In this regard, SHA shall include in its construction contractor's specifications provisions for the avoidance of fenced site features or areas. The provisions shall include a penalty clause for willful disturbance of these protected archeological zones.

B. Monitoring Site Disturbance:

SHA archeologists will regularly monitor construction to assess the effectiveness of the protection measures. SHA archeologists also will submit periodic progress reports to the Maryland State Historic Preservation Officer (SHPO) on the initial implementation of fencing and other protective measures and on the status of construction vis-a-vis the fenced site features. Representatives of the Maryland SHPO may visit the District during construction to examine the effectiveness of the treatment measures.

In the event that a protected feature or a previously unidentified, unmitigated archeological resource is disturbed during construction, all construction work involving subsurface disturbance will be halted in the area of the discovered resource and in the area immediately surrounding the resource where further subsurface remains may reasonably be expected to occur. Construction work may continue without interruption in other portions of the project area. ~~Within four (4) working days of notification of discovery, SHA archeologists will:~~ a) inspect the resource and determine if it meets National Register Criteria (36

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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Features 19 and 34, associated with the millrace; Feature 10, the abutments of the 19th century bridge; Feature 14, the race gate; and Feature 15, the milldam.

Features outside the proposed SHA right-of-way that are privately owned include: Feature 39, the Hatfield residence (owned by Mr. and Mrs. Phillip Hatfield); Features 5 (possible structure location), 6 (two structural foundations and an early midden deposit), 7 (footings of a worker's cabin), 8 (earthen terrace), 13 (19th century road), 38 (stairs), 40 (residence), 41 and 45 (artifact concentrations), all located on the property of Mr. Mrs. James Robinson; and Feature 42 and 43 (located on the property of Mr. and Mrs. Richard Popp).

A. Owner Notification

SHA will provide each landowner with a written statement on the District's significance and on how and why SHA designed the project to avoid total site destruction. These statements, copies of which SHA will send to the Maryland SHPO, will include descriptions and locations of the features on each owner's land, explanations of the importance of those features to the site as a whole, and justified recommendations for site treatment and preservation.

B. Historic Preservation Easements

SHA will initiate and facilitate communication between landowners and the Maryland SHPO during data recovery to encourage donation of perpetual historic preservation easements to the State of Maryland. The SHPO will be responsible for developing and implementing historic preservation easements for these properties.

C. Public interpretation

SHA will consult with Howard County's Department of Recreation and Parks on the appropriate integration and interpretation of the Simpsonville Archeological District in the Middle Patuxent Environmental Area. If the Environmental Area is, in fact, developed, SHA will prepare a summary of its discussions with Howard County on the use of the District for a hiking trail and other public interpretation. SHA will submit its summary to the Maryland SHPO as part of the final assessment described below in Section IV.; the summary will include recommendations for a plan to protect the District from vandalism and other effects on the District expected through public access.

III. Management Recommendations

In conjunction with or upon completion of data recovery, SHA will prepare long-term management recommendations for the treatment of the Simpsonville Archeological District. The recommendations will consist of specific measures for the future treatment of the District's features: for example, continued fencing, avoidance, vegetation clearance, stabilization, measures to prevent vandalism, and so forth. SHA will submit its set of recommendations to the Maryland SHPO, the individual property

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

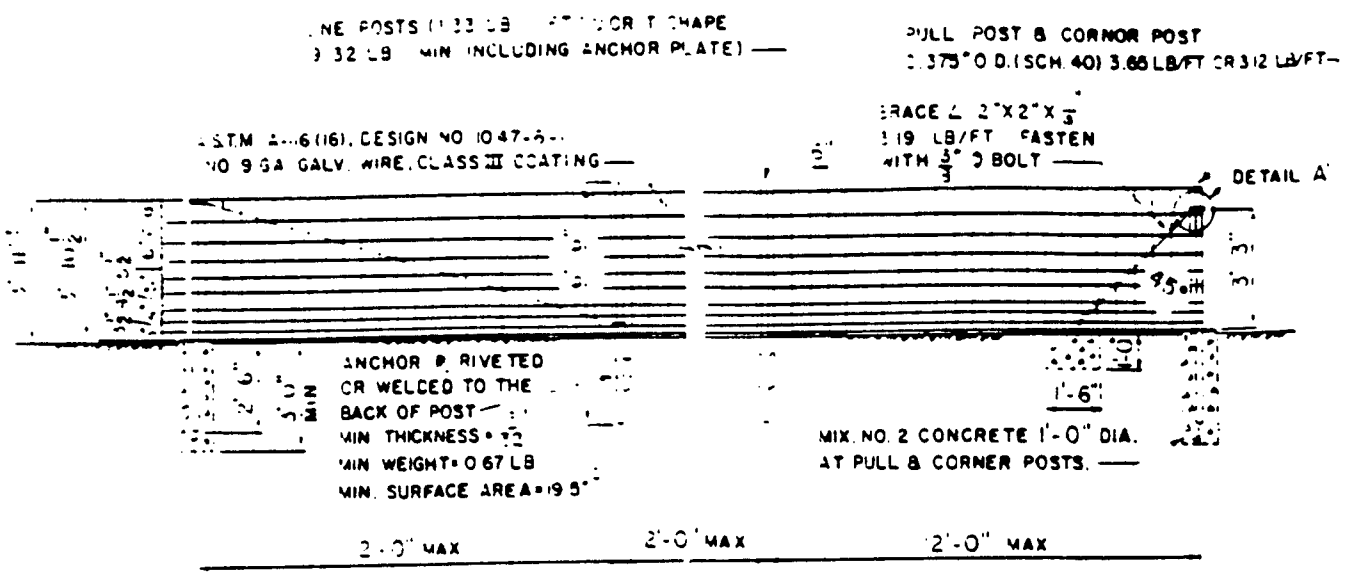
Upon completion of the auxiliary site treatment measures, SHA will prepare a written assessment evaluating the effectiveness of all site treatment measures listed in Appendix B and employed to protect the District from construction impacts. The assessment will be submitted to the SHPO and FHWA, and will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

Figure 1

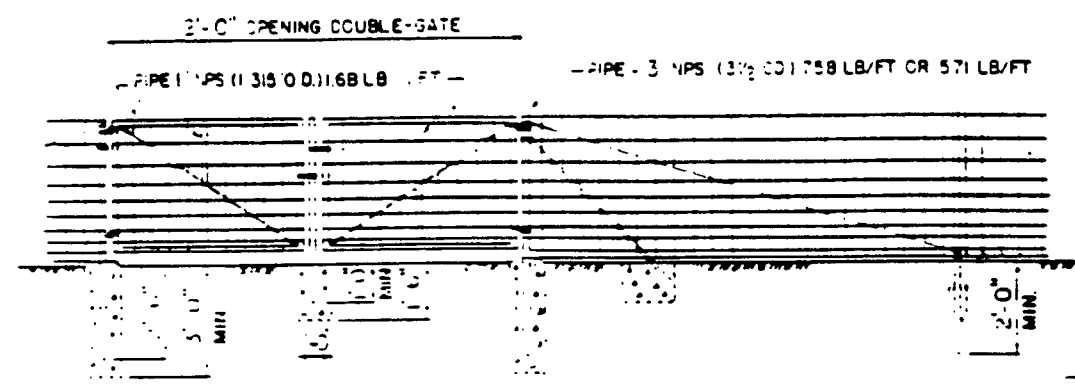
Map showing proposed alignment of farm-type fence to be erected to protect portions of the Simpsonville District. The bridge pier on the north bank (at Station 141+67.5) would be constructed from the south (between the pier and the riverbank). Access would be from present Cedar Lane, travelling west 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+79.5) would be accomplished entirely from the top of the hill, thus avoiding damage to critical archeological features on the floodplain (arrows).





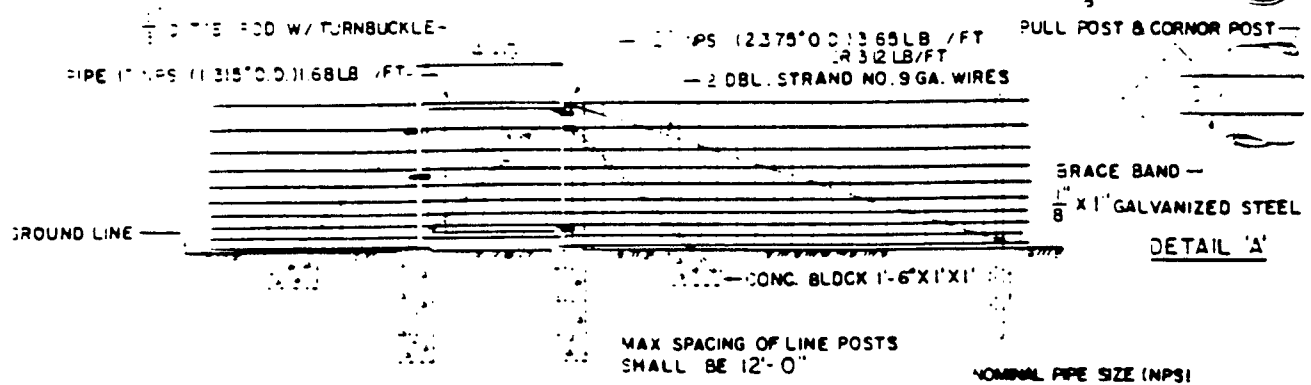


**GENERAL DETAILS**



GATE 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 2" 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 HAND MIXED 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 HAND MIXING 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.

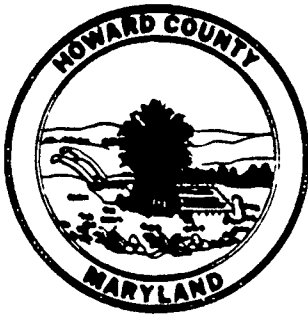
Figure 2. Specifications of the temporary farm-type fence that will be used to protect portions of the Simpsonville District during construction.

**STATE OF MARYLAND  
 DEPARTMENT OF TRANSPORTATION  
 STATE HIGHWAY ADMINISTRATION**

STANDARDS FOR HIGHWAYS AND INCIDENTAL STRUCTURES

**4'-0" FARM TYPE FENCE**

STANDARD NO. MD - 690.03



County Council of Howard County

COUNCILMEMBERS

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

RECEIVED  
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- 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**

99 Howard County  
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,

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



**Maryland Department of Transportation  
State Highway Administration**

100

O. James Lighthizer  
Secretary  
Hal Kassoff  
Administrator

February 1, 1991

Mr. Jeffrey Bourne, Director  
Howard County  
Department of Recreation and Parks  
3300 North Ridge Road, Suite 170  
Ellicott City, Maryland 21043

Dear Mr. Bourne:

As part of the environmental process for the relocation of MD 32 from MD 108 to Pindell School Road, archeological studies were completed. The Simpsonville Stone Ruins (18HO80), were identified as eligible for listing in the National Register of Historic Places as a district. This site is located in the vicinity of the proposed interchange at MD 32 Relocated and Cedar Lane. The Maryland Historical Trust (MHT) has identified site treatment measures including excavation which are to be undertaken by the State Highway Administration (SHA) within our right-of-way. Portions of the site extend into the Middle Patuxent Environmental Area which is owned by Howard County. Because Howard County is a owner of property on which components of the site are located, the State Highway Administration is notifying you of measures which are being developed to protect it.

Specific treatment measures for those areas of 18HO80 outside SHA right-of-way were recommended by the MHT. Howard County has indicated through the Management and Development Study for the Middle Patuxent Environmental Area, 1981 that the Environmental Area is intended to promote environmental awareness, appreciation, and learning. It is believed that these management goals of the Howard County Department of Recreation and Parks are compatible with the goal of preserving portions of the Simpsonville 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. Other 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; Features 19 and 34, associated with the millrace; Feature 10, and the abutments of the 19th century bridge (see attached map).

(301) 333-1177

My telephone number is \_\_\_\_\_

101

Mr. Jeffrey Bourne  
February 1, 1991  
Page 2

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 Environmental Area to preserve and protect the archeological site. This cooperation will include, but not be limited to, providing interpretive information on 18H080 and access to the SHA's right-of-way. These plans are contingent upon Howard County's ability to obtain property rights to this area.

Please provide us with your comments on these proposals.

Very truly yours,

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

by: Bourne M. J. / fu  
Cynthia D. Simpson  
Assistant Division Chief  
Project Planning Division

LHE:CDS:cd  
Attachments (2)  
cc: Mr. Herman Rodrigo  
Mr. Anthony Capizzi  
Dr. Ira Beckerman  
Mr. Richard Ervin ✓  
Mr. Rodney Little  
Ms. Beth Cole  
Mr. Wesley Glass