

Washington Metropolitan Area Transit Authority - Consulting Party Comment (Emphasis Added by NPS to Direct Responses to Comments in Blue)

May 19, 2025 Nick Bartolomeo National Park Service Resources Manager Rock Creek Park
202-895-6010 nick_bartolomeo@nps.gov ELECTRONIC SUBMISSION Subject: Foundry
Branch Trestle Bridge Demolition Project Section 106 Consultation Comments on Draft
Memorandum of Agreement

Dear Mr. Bartolomeo, The Washington Metropolitan Area Transit Authority (WMATA) thanks the National Park Service (NPS) for providing the draft Section 106 National Historic Preservation Act (NHPA) memorandum of agreement (MOA) on April 21, 2025. NPS has determined that the proposed undertaking will have an adverse effect to the Foundry Branch Trestle Bridge, a contributing resource, to Glover Archbold Park, a National Register of Historic Places (NRHP)-listed historic property. The purpose of the MOA is to document measures to mitigate the adverse effect caused by the bridge's demolition.

WMATA would like to express continued support for and a willingness to work with NPS to implement mitigation measures that interpret the history of Glover Archbold Park, the trestle, and the electric trolley line in the District of Columbia and preserve the park-like setting of Glover Archbold Park. As such, WMATA offers the following comments on the draft MOA document:

A) WMATA recommends a number of edits and revisions to the Whereas statements. Please see the enclosed draft MOA document for specific edits.

- **NPS will revise some of the Whereas clauses but stressed the importance of maintaining a robust history of the undertaking through the clauses.**

B) WMATA proposes to provide funds for either HAER documentation of the Foundry Branch trestle bridge (Stipulation II.A) or an update to the NRHP nomination for Glover Archbold Park (Stipulation II.B), but not both mitigation measures.

- **NPS maintains that an amendment to the Glover-Archbold Park National Register nomination is needed after demolition of the structure to ensure that NPS baseline documentation is complete, accurate, and reliable. Loss of the trestle bridge will result in the removal of a contributing resource. The amendment shall include revisions to Sections 7 and 8, an updated contributing resource list, and updated photographs and maps to reflect the loss of the structure. In addition, DC SHPO has requested a higher level of HAER documentation to adequately document the structure.**

C) WMATA proposes to provide funds for NPS to complete the development and installation of interpretive signage (Stipulation II.C).

- **NPS recommends that WMATA hire a contractor to develop interpretive wayside panels in consultation with NPS.**

D) WMATA requests revisions be made to Stipulation II.D.1 to clarify that preservation and protection of the Trestle footers will take place during demolition, but no additional preservation or protection measures will be taken for the footers following demolition.

- **NPS will work with WMATA to maintain the footers and the open character of the valley post-demolition.**

E) WMATA requests revisions to Stipulation E.1 to clarify what will be required during the five-year vegetation maintenance period. Additionally, WMATA recommends a one-year maintenance period only for land within the limit of disturbance.

- **NPS requires a five-year timeline for maintenance of improved park lands to ensure that invasives are controlled. NPS will develop a treatment plan for WMATA as part of the Special Use Permit to be issued prior to demolition.**

F) WMATA requests clarification on the extent and nature of trail repairs in Stipulation II.E.2.

- **The trail is part of the contributing historic Glover Archbold Park trail system. Repairs must be compatible with the existing character of the trail system. The trail will be relatively simple in design and earthen or dirt.**

G) WMATA recommends revisions to Stipulation III.A.1 to clarify the chain of communication with regards to unanticipated archaeological discoveries.

- **NPS will add introductory paragraph to Section III to clarify NPS and WMATA responsibilities.**

H) WMATA also offers two general comments to be applied to all stipulations where appropriate:

- **WMATA requests clarification on the roles and responsibilities of each party with regard to the completion of the mitigation measures.**
- **WMATA recommends revising the duration for the completion of stipulation deliverables to reference the date for submission of draft deliverables to SHPO and consulting parties rather than date for completion of entire stipulation. The party responsible for completing the stipulation deliverables may not have control over agency review periods but can control initial draft submission date.**
- **NPS has revised the MOA to include timelines for completion of specific stages associated with the mitigation measures.**

WMATA looks forward to continued discussions on the development of mitigation measures and the MOA to resolve the undertaking's adverse effects to historic properties. I suggest a meeting to continue the discussion. Sincerely, Jim Ashe Project Manager ENCLOSURE: Proposed MOA Edits

- See supplemental document for NPS responses to specific track changes provided in the draft MOA.

DC Preservation League - Consulting Party Comment (Emphasis Added by NPS to Direct Responses to Comments in Blue)

May 20, 2025 Mr. Brian Joyner, Superintendent National Park Service - Rock Creek Park 3545 Williamsburg Lane, NW Washington, DC 20008

The DC Preservation League (DCPL) appreciates the opportunity to comment on the Memorandum of Agreement proposed regarding a National Park Service (NPS) Special-Use Permit requested by the Washington Metro Area Transit Authority (WMATA) to demolish the historic Foundry Branch Trestle in Glover Archbold Park.

DCPL continues to strongly oppose the removal of the last remaining Trestle bridge in the District of Columbia. Allowing this demolition would reinforce the troubling notion that if a property is neglected long enough, the owner will be rewarded for that neglect through the destruction of an irreplaceable resource. This loss would be permanent and detrimental to the public good.

DCPL asserts that WMATA's arguments for demolition can be summarized simply by the entity not wanting to pay for upkeep costs required of every property owner - a basic responsibility of property ownership. **A) Why has there been no exploration by WMATA of supporting the construction of a tunnel under the Trestle to provide a safe passage for hikers on the Foundry Branch Trail, while a solution for funding for the rehabilitation of the structure is solidified?** There are alternatives to demolition that have not been explored and exhausted.

- **NPS cannot comment on WMATA's exploration of a tunnel under the Foundry Branch Trestle Bridge; however, NPS maintains that the safest alternative is to temporarily reroute the trail around the deteriorating trestle bridge.**

Given the above comments, DCPL aligns itself with the comments of the Advisory Council on Historic Preservation (ACHP), the DC State Historic Preservation Office and the National Trust for Historic Preservation in that **B) it believes that more time is needed for consulting parties to come to a consensus on mitigation should the determination that all possible alternatives to demolition have been exhausted. C) Further, the consulting parties have not been presented with any meaningful mitigation for the loss of the last extant Trestle in the District of Columbia.**

- **(B) WMATA has proposed divesting itself of the Trestle and the Underlying Properties by selling or conveying them outright to federal or District agencies, but absent the provision of funding or interest it has found no willing buyer or recipient. As noted in the 2020 Mayor's Agent (HPA No. 2018-297), "For many years WMATA has sought to sell, donate, or quitclaim the trestle and associated parcels**

of land to any willing party; it has even offered to pay the D.C. Department of Transportation (DDOT) to take them."

- (C) Absent an interested party with funding secured, the NPS has proposed the following mitigations: Historic property documentation including HAER Level II, updates to the Glover-Archbold Park National Register of Historic Places nomination form; installation of interpretative wayside panels; preservation of trestle footers; landscape reestablishment and reopening of the historic trail.

D) It's clear from the consulting party letters received to date that further consultation is necessary to reach a consensus on satisfactory mitigation. WMATA has neglected this historic resource since the transfer of ownership in the 1990s. It is their obligation, as the owners, to avoid, to the greatest possible extent, the effect on this important transportation resource.

- The NPS notified the public and conducted four (4) Section 106 consultation meetings on the following dates: March 30, 2021; May 11, 2022; April 22, 2024; and October 25, 2024, to inform the public of the Undertaking and solicit comments on historic preservation concerns regarding the impacts to historic properties on federal lands from the proposed demolition. NPS has determined that all potential options for preservation have been exhausted and in the interest of public safety, protection of critical infrastructure, and re-establishment of the historic trail, NPS must proceed with issuance of the special use permit for demolition of the Foundry Branch Trestle Bridge.

DCPL looks forward to further consultation on this important issue and thanks NPS for their continued efforts as stewards of Rock Creek Park and Glover Archbold Park.

Sincerely, Rebecca Miller Executive Director

**National Capital Historical Museum of Transportation - Consulting Party Comment
(Emphasis Added by NPS to Direct Responses to Comments in Blue)**

May 8, 2025 Mr. Brian Joyner Superintendent National Park Service Rock Creek Park 3545
Williamsburg Lane, NW Washington, DC 20008

Mr. David Maloney District of Columbia State Historic Preservation Officer DC Office of
Planning 800 North Capitol Street, NE Suite 7100 Washington, DC 20002

Dear Messrs. Joyner and Maloney,

The National Capital Trolley Museum just recently learned that the National Park Service is conducting a Section 106 review of the Washington Metropolitan Area Transit Authority's (WMATA)'s proposal to demolish the historic Foundry Branch Trestle in Glover Archbold Park.
A) We are writing in accordance with 36 CFR 800.2(c)(5) of the Section 106 regulations to

request consulting party status due to our demonstrated interest in the undertaking and our concern about the undertaking's effects on historic properties--both of which stem directly from the purpose and goals of our museum; the fact that our collection includes one of the original streetcars that used to cross over the Trestle; and because we believe we may be able to offer effective means to mitigate the adverse effect that will result if demolition of this important historic trolley-related artifact cannot be avoided.

- **NPS welcomes all interested people and organizations to participate in the consultation process.**

B) Specifically, we are interested in salvaging the Trestle, in whole or in part, and storing the salvaged elements for potential future reconstruction or interpretive uses.

- **The NPS does not own the Foundry Branch Trestle Bridge. It is the property of WMATA. Discussions regarding salvaging and storing historic fabric must be held with the owner of the trestle structure.**

We would like these measures to be considered for the draft Memorandum of Agreement that we understand is currently being circulated for review and comment.

Thank you for your attention to this request and for your ongoing efforts to protect our shared transportation heritage. Sincerely, Eric Madison Executive Director, NCTM

Advisory Neighborhood Commission 3D - Consulting Party Comment (Emphasis Added by NPS to Direct Responses to Comments in Blue)

May 7, 2025 National Park Service Rock Creek Park 3545 Williamsburg Lane, NW Washington, D.C. 20008 Re: ANC3D Comments on the Demolition of the Trolley Trestle Trail Bridge

Dear National Park Service:

On May 7, 2025 at its regular and duly-noticed monthly meeting, Advisory Neighborhood Commission 3D discussed the National Park Services proposal to grant permission for the demolition of the Foundry Branch Trolley Trail Trestle Bridge. **A) The Commission voted to urge the National Park Service to delay the issuance of the Special Use Permit to allow the community time to seek the creation of a Public-Private Partnership to preserve and restore the bridge.**

- **WMATA has proposed divesting itself of the Trestle and the Underlying Properties by selling or conveying them outright to federal or District agencies, but absent the provision of funding or interest it has found no willing buyer or recipient. As noted in the 2020 Mayor's Agent (HPA No. 2018-297), "For many years WMATA has sought to sell, donate, or quitclaim the trestle and associated parcels of land to any willing party; it has even offered to pay the D.C. Department of Transportation**

(DDOT) to take them." The NPS is continuing to follow the NHPA Section 106 process. Should a viable option arise for the preservation of the Foundry Branch Trestle Bridge, it will be fully considered as part of the process.

ANC3D is aware of the history of the bridge and the desire for WMATA to not carry the burden of this non-functioning yet historic structure. We are also aware of the District Department of Transportation (DDOT) financial constraints that prohibit the rebuilding of this bridge for use by the public. Yet ANC3D and many members of our community still see a path towards preservation.

In the memorandum NPS states, "WMATA has proposed divesting itself of the Trestle and the Underlying Properties by selling or conveying them outright to federal or District agencies, or to Georgetown University, but absent the provision of funding for conservation or stabilization of the Trestle to these parties, it has found no willing buyer or recipient;"

We believe that WMATA has not sought widely enough for a willing buyer or recipient of the bridge. ANC3D believes there could be a willing partner who could partner with the District in a Public-Private Partnership to preserve the bridge and put it back into use as a multi-modal pathway. We ask the National Park Service to delay issuance of this permit for six months to allow the local community to seek such a partner. If no willing partner, with appropriate financial means, emerges within six months, then the National Park Service could proceed with issuance of the permit to WMATA.

The area of Palisades and Foxhall is separated from the rest of the District by Glover Archibold Park and isolated on the other side by the Potomac River. WMATA runs one bus line service through our neighborhood which is low frequency. Our access to NPS controlled areas is limited. Historically, this bridge was the most direct pathway for our residents to travel to nearby Georgetown. The only direct path, along Canal Road between its intersection with Foxhall Road and the Whitehurst Freeway is narrow and dangerous for pedestrian and bicycle traffic. Removing this historic bridge will cut off the possibility of an alternative and safer path for our residents for generations to come if not forever.

Please delay issuance of this permit and allow our community time to find a willing financial partner to collaborate with the City in preserving this historic connection between our community and Georgetown.

Sincerely, Bernie Horn, Chair

DC Water - Consulting Party Comment (Emphasis Added by NPS to Direct Responses to Comments in Blue)

To whom it may concern,

The future demolition will impact DC Water's several utilities including to: Utilities crossing from North To South (along Glover Archibold Trail) 108-inch Separated Storm Main. 72-inch

Separated Sanitary Sewer Main. B. Utilities along existing Historic Trestle Bridge 24-inch Separated Sanitary Main. 42-inch Separated Storm Main 84-inch Concrete Water Transition Main 36-inch Steel Water Transmission Main 36-inch CIP Water Transmission Line Note-1: We need to review the demolition plan.

- **The Special Use Permit will require WMATA to work with DC Water and all other utility holders in advance of the demolition process.**

Coalition to Save the Trolley Trestle - Consulting Party Comment (Emphasis Added by NPS to Direct Responses to Comments in Blue)

May 14, 2025 To: Brian Joyner, Superintendent, Rock Creek Park, National Park Service Cc: Randy Clarke, General Manager, Washington Metropolitan Area Transit Authority David Maloney, DC State Historic Preservation Officer Reid Nelson, Executive Director, Advisory Council on Historic Preservation

From: Peter Harnik, Coordinator, Coalition to Save the Trolley Trestle COMMENTS ON PROPOSED MOA REGARDING THE DEMOLITION OF THE FOUNDRY BRANCH TRESTLE BRIDGE

The Coalition to Save the Trolley Trestle is disappointed with this proposed Memorandum of Agreement. **A) We continue to believe that the historic Foundry Branch Trestle is an icon very much deserving of preservation and reuse as a pedestrian and walking trail over the Foundry Branch valley in Glover Archbold Park. However, if there is agreement that no feasible way can be found to transfer ownership of the trestle to an entity that will save it, the Coalition requests that the structure be disassembled and stored in such a way that it can be reassembled and reused in the future. Such a reuse might occur in the original historical location or, potentially, in some other location within the District of Columbia or elsewhere.** (The Coalition to Save the Trolley Trestle is continuing to build the political and financial public-private partnership that will eventually restore and maintain the trestle.) **We believe that the ideal entity to store the disassembled pieces of the trestle would be the National Park Service. Other possibilities could include the National Capital Trolley Museum or the District Department of Transportation.**

- **The NPS does not own the Foundry Branch Trestle Bridge. It is the property of WMATA. Discussions regarding salvaging and storing historic fabric must be held with the owner of the trestle structure.**

B) We moreover strongly oppose the demolition of any of the supporting abutment structures that presently undergird the trestle. We believe the abutments should remain, both as important historic artifacts and as potential future structures that will again support the reassembled trestle.

- The NPS does not own the land that houses the abutments; however, NPS has continually maintained that retention of the abutments will pose public safety risks as well as require extensive resources to maintain over time. There is clear evidence from as recent as August 2025 of unsafe behavior on the nearby C&O Canal bridge abutment north of Key Bridge. Despite extensive safety measures at that location, people continue to fall and/or jump off the structure. The owner of the abutments would need to maintain the structures free of graffiti, which would be difficult to sustain. NPS has considerable experience installing perimeter fences that have repeatedly been subjected to damage by vandals. Finally, long-term preservation would require preservation and conservation of the abutments by the owner.

C) In fact, in the interim, the abutments (with a fence at the top) could be appropriate locations not only for a viewing platform but also for explanatory signage about the Glen Echo Trolley.

- NPS does not own the Foundry Branch Trestle Bridge structure or its approaches and abutments. Interpretive wayside panels will meet NPS standards and will be installed in a location mutually agreeable to NPS, DC SHPO, and WMATA along Canal Road NW, in a manner that is accessible to all visitors.

Thank you for the opportunity to comment on the proposed Memorandum of Agreement.

National Trust for Historic Preservation - Consulting Party Comment (Emphasis Added by NPS to Direct Responses to Comments in Blue)

May 20, 2025 Brian Joyner, Superintendent Rock Creek Park National Park Service 3545
Williamsburg Lane NW Washington, DC 20008

Re: Comments on Draft MOA for Special Use Permit Application from WMATA for Proposed Demolition of Historic Foundry Branch Trestle Bridge, Glover Archbold Park

Dear Superintendent Joyner,

We appreciate the email communication from Cortney Cain Gjesfjeld inviting comments from the National Trust for Historic Preservation in response to the draft Memorandum of Agreement (MOA) for the proposed permit that would allow the Washington Metropolitan Area Transit Authority (WMATA) to demolish the historic Foundry Branch Trestle Bridge in Glover Archbold Park.

The National Trust strongly supports the comments that have already been submitted by the DC State Historic Preservation Office (SHPO), the Advisory Council on Historic Preservation (ACHP), the Coalition to Save the Trolley Trestle, and the National Capital Trolley Museum. **A) We especially agree with the fundamental premises of the SHPO comments that the National Park Service has not completed the process to "develop and evaluate alternatives**

or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties," as required by 36 C.F.R. § 800.6(a).

- WMATA has proposed divesting itself of the Trestle and the Underlying Properties by selling or conveying them outright to federal or District agencies, but absent the provision of funding or interest it has found no willing buyer or recipient. As noted in the 2020 Mayor's Agent (HPA No. 2018-297), "For many years WMATA has sought to sell, donate, or quitclaim the trestle and associated parcels of land to any willing party; it has even offered to pay the D.C. Department of Transportation (DDOT) to take them." The NPS is continuing to follow the NHPA Section 106 process. Should a viable option arise for the preservation of the Foundry Branch Trestle Bridge, it will be fully considered as part of the process.

In particular, there are a number of proposals that would minimize adverse effects that need to be explored further. For example:

B) In our view, the alternative of retaining the Trestle in place and constructing a protected tunnel or corridor to cross under the bridge has not been adequately considered.

- The NPS cannot comment on WMATA's exploration of a tunnel under the Foundry Branch Trestle Bridge. However, the NPS places the highest priority on visitor safety. While construction of a tunnel structure could allow NPS to re-open the trail, previous engineering studies have indicated that the bridge is at risk of failure. The NPS cannot envision a tunnel design that is feasible and would protect visitors from the collapse of the trestle portion of the bridge, which lies above the trail. Therefore, the NPS is not considering an option for a tunnel for the trail.

C) The National Capital Trolley Museum has proposed salvaging the Trestle "in whole or in part" and storing it for potential future reconstruction or display. This has not been addressed.

- The NPS does not own the Foundry Branch Trestle Bridge. It is the property of WMATA. Discussions regarding salvaging and storing historic fabric must be held with the owner of the trestle structure.

D) The historic abutments should be retained in place, and ideally some of the original steel elements, rather than merely retaining the concrete Trestle "footers".

- The NPS does not own the land that houses the abutments; however, NPS has continually maintained that retention of the abutments will pose public safety risks as well as require extensive resources to maintain over time. There is clear evidence from as recent as August 2025 of unsafe behavior on the nearby C&O Canal bridge abutment north of Key Bridge. Despite extensive safety measures at that location, people continue to fall and/or jump off the structure. The owner of the abutments would need to maintain the structures free of graffiti, which would be difficult to sustain. NPS has considerable experience installing perimeter fences that have repeatedly been subjected to damage by vandals. Finally, long-term preservation

would require preservation and conservation of the abutments by the owner. Regarding the preservation of steel elements, they would be an attractive nuisance that would require long-term conservation and preservation interventions by the owner to maintain their structural integrity.

E) The other WMATA-owned "underlying properties," including air rights and adjacent parcels, should be transferred to the National Park Service to ensure permanent protection.

- The NPS does not oppose consideration of the transfer of adjacent WMATA land to the federal government. However, due to the complexity of the land transfer process and environmental investigation potentially required for the site, the timeframe for a such a land transfer would likely extend beyond the life of this MOA. Therefore, a land transfer is outside of the scope of this undertaking.

F) In addition to these measures that would minimize the adverse effects, the current proposal for mitigation is severely inadequate, as described in detail by the SHPO and ACHP comments.

- The NPS has determined that the mitigations identified in the MOA are robust and commensurate with the loss of this historic structure. Proposed mitigations include Historic property documentation including HAER Level II, an amendment to the Glover-Archbold Park National Register of Historic Places nomination form; installation of interpretative wayside panels; preservation of trestle footers; landscape re-establishment and reopening of the historic trail.

G) We urge the National Park Service to convene additional consultation meetings to facilitate detailed discussion of all the comments that have been submitted, and to fully consider the proposed alternatives and modifications to the project that would minimize and mitigate the adverse effects.

- The NPS notified the public and conducted four (4) Section 106 consultation meetings on the following dates: March 30, 2021; May 11, 2022; April 22, 2024; and October 25, 2024, to inform the public of the Undertaking and solicit comments on historic preservation concerns regarding the impacts to historic properties on federal lands from the proposed demolition. NPS has determined that all potential options for preservation have been exhausted and in the interest of public safety, protection of critical infrastructure, and re-establishment of the historic trail must proceed with issuance of the special use permit for demolition of the Foundry Branch Trestle Bridge.

Thank you in advance for considering these comments from the National Trust for Historic Preservation.

Sincerely, Elizabeth S. Merritt Deputy General Counsel

cc: Cortney Cain Gjesfjeld, Cultural Resources Program Manager, Rock Creek Park, NPS
Turkiya Lowe, Federal Preservation Officer, NPS Kirsten Kulis and Chris Koeppel, Advisory
Council on Historic Preservation Andrew Lewis, DC State Historic Preservation Office Rebecca
Miller, DC Preservation League Eric Madison, National Capital Trolley Museum Peter Harnik,
Coalition to Save the Trolley Trestle

**District of Columbia State Historic Preservation Office - Consulting Party Comment
(Emphasis Added by NPS to Direct Responses to Comments in Blue)**

May 20, 2025 Mr. Brian Joyner, Superintendent National Park Service Rock Creek Park 3545
Williamsburg Lane, NW Washington, DC 20008

RE: Additional DC SHPO Comments on the Draft Memorandum of Agreement regarding a NPS
Special-Use Permit for Demolition of the Foundry Branch Trestle, Glover Archbold Park Dear

Mr. Joyner:

On November 25, 2024, the District of Columbia State Historic Preservation Officer (SHPO) wrote to the National Park Service (NPS) to provide extensive comments regarding the minimization and mitigation measures we believe are necessary to adequately resolve the adverse effects that will result from demolition of the Foundry Branch Trestle (Trestle) in Glover Archbold Park. Our comments were based upon nearly eleven years of advocating for preservation of this important historic resource and the many pro-preservation comments consulting parties have expressed over the years. The recommendations were also intended to ensure that resolution was commensurate with the loss of the last remaining streetcar trestle in Washington DC.

On April 21, 2024, the NPS circulated a draft Memorandum of Agreement (MOA) which did not adequately address our earlier comments. **A) We continue to believe that commensurate minimization/mitigation of the adverse effects should include preservation, restoration and adaptive use of the Trestle abutments for interpretive purposes and for potential reuse if a new pedestrian/bicycle path were to be constructed in the future.**

- **The NPS does not own the land that houses the abutments; however, NPS has continually maintained that retention of the abutments will pose public safety risks as well as require extensive resources to maintain over time. There is clear evidence from as recent as August 2025 of unsafe behavior on the nearby C&O Canal bridge abutment north of Key Bridge. Despite extensive safety measures at that location, people continue to fall and/or jump off the structure. The owner of the abutments would need to maintain the structures free of graffiti, which would be difficult to sustain. NPS has considerable experience installing perimeter fences that have repeatedly been subjected to damage by vandals. Finally, long-term preservation would require preservation and conservation of the abutments by the owner.**

B) The image of the Glen Echo Trestle over Clara Barton Parkway below demonstrates that abutments can be preserved in ways that adequately address the health/safety concerns the NPS has raised to object to preservation of the abutments. In Glover Archbold's case, the safety railings would simply need to extend around the ends of the abutments rather than along the Trestle. This approach would preserve meaningful and recognizable historic fabric; provide ideal locations for interpretive signage; create opportunities for trails "spurs" that would allow visitors to experience these vestiges of history directly (so we also recommend the spurs be included as mitigation); and frame views to the park. As previously indicated, retention of the Trestle's "low footers" alone would not provide such benefits.

- **NPS does not believe that the Glen Echo Trestle is not an analogous example since it has been reconstructed as an active trail bridge. It serves a different function as it is part of an active circulation system, whereas retention of the Foundry Branch Trestle Bridge abutments would serve as a dead end. NPS cannot assume that a trail connection facility will be constructed in location at any point in the future, as DDOT, after previous extensive study, has rejected this idea.**

C) We also continue to recommend that at least some of the Trestle's original steel elements be preserved along with the abutments, but if that is not possible, we fully support the recent offer by the National Capital Trolley Museum to salvage the Trestle "in whole or in part" and store it for potential future reconstruction or interpretive purposes. Likewise, we support the museum's request to be a consulting party for the reasons outlined in their letter, including the fact that a streetcar that once travelled over the Trestle is part of their collection. In response to this recent, significant development, the MOA should be revised to incorporate stipulations that evaluate the potential for partial retention of Trestle components on site and salvage of the remaining elements.

- **The NPS does not own the Foundry Branch Trestle Bridge. It is the property of WMATA. Discussions regarding salvaging and storing historic fabric must be held with the owner of the trestle structure. NPS would support inclusion of a minimization measure in the MOA involving retention of historic bridge fabric offsite on non-NPS lands by a third party in coordination with WMATA.**

D) We support the development of interpretive signage but believe the relevant stipulations should be revised to reflect the comments above which relate to the abutments, steel elements, trail spurs and the like. For example, we believe a minimum of one sign would be required per abutment.

- **Interpretive wayside panels will meet NPS standards and will be installed in a location mutually agreeable to NPS, DC SHPO, and WMATA along Canal Road NW, in a manner that is accessible to all visitors.**

E) Since complete loss of the Trestle remains a possibility, we recommend that the HAER documentation be increased to Level I, or at least Level II, instead of the minimum Level III.

- **NPS recommends completion of updates to the Glover-Archbold Park National Register nomination after demolition of the structure to ensure that park baseline documentation is complete and accurate. Loss of the trestle bridge will result in the removal of a contributing resource. In addition, NPS supports HAER Level II documentation of the trestle.**

F) Another matter that does not appear to have been adequately addressed as potential mitigation is the disposition of the WMATA-owned “underlying properties,” including the Trestle air rights and parcels within and immediately adjacent to Glover Archbold Park (see map below). WMATA has repeatedly offered these assets to any entity that would agree to take ownership in the past. Now that the Trestle is to be removed, we recommend that these parcels be transferred to the NPS so the boundaries of the park could be expanded, if the NPS agrees such an expansion would be beneficial. Regardless, the air-rights should be maintained for their original purpose to help facilitate any future pedestrian/bicycle trails that may be proposed.

- **The NPS does not oppose consideration of the transfer of adjacent WMATA land to the federal government. However, due to the complexity of the land transfer process and environmental investigation potentially required for the site, the timeframe for a such a land transfer would likely extend beyond the life of this MOA. Therefore, a land transfer is outside of the scope of this undertaking.**

G) While we support the proposal for landscape rehabilitation, we also recommend that these stipulations be revised to reflect the comments above (e.g. remove vegetation to expose the abutments, plan and implement trail spurs that lead up to the abutments from the main trail etc.) and we request an opportunity to review and comment on the identification of “historic viewsheds” within the park.

- **The goal of the rehabilitation is to return the trestle site and its surroundings to a natural condition, while maintaining the viewsheds associated with the open central valley corridor in this location. This will allow the park to continue to function as a critical greenway that extends from Northwest Washington, D.C. to the Potomac River. In the future, NPS will complete a Cultural Landscape Report for Glover-Archbold Park to identify and evaluate historic views and vistas.**

Additional comments on a few of the MOA’s specific stipulations in “Track Changes” format are attached to this letter for reference.

If you should have any questions or comments regarding any of these matters, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, we look forward to reviewing a revised draft MOA and to working together with all consulting parties to complete the Section 106 review of this undertaking. Thank you for providing this additional opportunity to comment.

Sincerely, C. Andrew Lewis Senior Historic Preservation Officer DC State Historic Preservation Office

- See supplemental document for NPS responses to specific track changes provided in the MOA.

Advisory Council on Historic Preservation (Emphasis Added by NPS to Direct Responses to Comments in Blue)

May 20, 2025 Mr. Brian Joyner Superintendent Rock Creek Park (National Capital Region) U.S. Department of the Interior, National Park Service 3545 Williamsburg Lane, NW Washington, DC 20008-1207

Ref: Proposed Permit for Removal of the Foundry Branch Trestle Bridge Glover Archbold Park, Washington, DC ACHP Project Number: 12811

Dear Mr. Joyner:

On April 21, 2025, the Advisory Council on Historic Preservation (ACHP) received your notification, by electronic mail, that a draft memorandum of agreement (MOA) was available for review on the National Park Service (NPS) Planning, Environment, and Public Comment website for the referenced undertaking.

The draft MOA was developed to document resolution of adverse effects associated with the undertaking, to draw to a close a review that is occurring pursuant to Section 106 of the National Historic Preservation Act, (NHPA, 54 U.S.C. § 306108), and its implementing regulations “Protection of Historic Properties” (36 CFR part 800). The review is being administered by Rock Creek Park, which has jurisdiction over Glover Archbold Park (Park), which is listed in the National Register of Historic Places.

The ACHP began participating in the review in April 21, 2021, and in consultation meetings and correspondence, staff has provided technical assistance and advice. **A) At this point, though some adverse effects on the Park may not be avoidable given recent developments and funding constraints, we continue to encourage NPS to consider ways to minimize adverse effects, retaining historic properties’ character-defining features when feasible. A more detailed analysis of such features may still yield reasonable preservation solutions that benefit the public.**

- NPS has determined that all potential options for preservation have been exhausted and in the interest of public safety, protection of critical infrastructure, and re-establishment of the historic trail and must proceed with issuance of the special use permit for demolition of the Foundry Branch Trestle Bridge.

B) In addition, the draft MOA sets forth various mitigation measures (e.g., documentation and interpretation) which warrant additional consultation.

- The NPS notified the public and conducted four (4) Section 106 consultation meetings on the following dates: March 30, 2021; May 11, 2022; April 22, 2024; and October 25, 2024, to inform the public of the Undertaking and solicit comments on historic preservation concerns regarding the impacts to historic properties on federal lands from the proposed demolition.

C) Finally, the draft MOA does not indicate whether or how the NPS consulted with Indian Tribes.

- Tribes with ancestral connections to the park were invited to participate in consultation but no tribe expressed interest in being a consulting party.

Technical comments on the draft MOA are attached for your review and consideration. If you have any questions, please contact Ms. Kirsten Kulis, NPS Liaison (202.517.0217, kkulis@achp.gov) and reference the ACHP project number above.

Sincerely, Christopher Koeppel Assistant Director Office of Federal Agency Programs Federal Property Management Section

- See supplemental document for NPS responses to specific track changes provided in the draft MOA.

Other Consulting Party Comments (Emphasis Added by NPS to Direct Responses to Comments in Blue)

I am generally in favor of preserving landscape features that have historical significance. However, the decaying remnants of the trestle bridge are an eyesore, adversely affecting the aesthetic pleasures of the natural corridor it traverses. Moreover, it is an attractive nuisance, with dangerous consequences. In the late 1970's, my older next-door neighbor, spry and tragically curious, ventured out onto the bridge, and fell to his death. The sooner this ugly reminder of that tragedy can be removed the better. An interpretive sign, explaining the delightful uses of the bridge in better times, is enough.

One thing lost if the bridge is removed is the certainty that a bridge will be allowed there. What would mitigate that would be if NPS would grant DDOT an easement to build a replacement bridge there in the future.

- NPS does not own the Foundry Branch Trestle Bridge structure or its approaches and abutments.