

Consulting Party Name/Affiliation	Date	Consulting Party Comment	Notes/Comments	NPS Response
Washington Metropolitan Area Transit Authority (WMATA)	17-May-25	Delete. "Whereas, D.C. Transit System, Inc. ("D.C. Transit"), the former owner of the Trestle and Lots 817 and 822 underlying the Trestle ("Underlying Properties"), abandoned the Trestle after operations ceased in 1960; and"	Strikethrough edits to MOA narrative. See pdf for full details/comments.	Changed to: "WHEREAS, D.C. Transit System, Inc. (D.C. Transit), the former owner of the Trestle and Lots 817 and 822 underlying the Trestle (Underlying Properties), ceased operations of the Trestle in 1960; and"
Washington Metropolitan Area Transit Authority (WMATA)	17-May-25	Add. "(Lots 817 and 822) after "Underlying Properties". After WMATA at the end of the clause insert "for the sole purpose of sale to fund public buses".	Strikethrough edits to MOA narrative. See pdf for full details/comments.	Changed to: "WHEREAS, in 1997, WMATA became the owner of the Trestle and Underlying Properties pursuant to Orders by the United States Court of Appeals for the District of Columbia in litigation arising from D.C. Transit's fare overcharges for bus service, directing D.C. Transit to transfer all assets of certain established restitution trust funds, including the Trestle and Underlying Properties, to WMATA for the sole purpose of sale to fund public buses; and"
Washington Metropolitan Area Transit Authority (WMATA)	17-May-25	Delete. "but did not take any action recommended in the study for stabilization or conservation of the Trestle;"	Strikethrough edits to MOA narrative. See pdf for full details/comments.	Changed to: "WHEREAS, WMATA conducted an engineering study for the Trestle in 2014, and determined that it was structurally unsound; and"
Washington Metropolitan Area Transit Authority (WMATA)	17-May-25	Delete. "Whereas, in 2016 the NPS learned of the findings documented in the 2014 engineering study and immediately closed the area under the Trestle to protect park visitors, and subsequently authorized WMATA to fence off the area underneath the Trestle for public safety, and"	Strikethrough edits to MOA narrative. See pdf for full details/comments.	Change not made. Whereas clause identifies the closure of the NPS trail and our subsequent permitting of WMATA to fence off the area for safety.
Washington Metropolitan Area Transit Authority (WMATA)	17-May-25	Delete. "Whereas, DDOT evaluated five potential trail alignments in this area and determined that based on cost, constructability, topography, and right-of-way impacts, DDOT would not seek to acquire ownership of the Trestle; and"	Strikethrough edits to MOA narrative. See pdf for full details/comments.	Narrative deleted and replaced with "WHEREAS, in January 2020, DDOT issued a final feasibility study for a Palisades Trolley Trail and the Foundry Branch Trolley Trestle Bridge and determined, based on several factors including cost, constructability, topography, and right-of-way impacts, that restoring the Trestle for use as part of a possible trail is not feasible, the District would "not be moving forward" with rehabilitation and reuse of the Trestle, and the District would "not seek to acquire ownership" of the Trestle; and"
Washington Metropolitan Area Transit Authority (WMATA)	17-May-25	"Whereas, WMATA has proposed divesting itself.... Delete "...absent the provision of funding for conservation or stabilization of the Trestle to these parties, it has"	Strikethrough edits to MOA narrative. See pdf for full details/comments.	Changed to: "WHEREAS, WMATA has attempted for years to sell or convey the Trestle and the Underlying Properties outright by selling or conveying them to federal or District agencies, but has found no willing buyer or recipient; and"
Washington Metropolitan Area Transit Authority (WMATA)	17-May-25	Replace "has proposed divesting itself" with "for years has unsuccessfully attempted to sell or convey the Trestle and Underlying Properties outright".	Strikethrough edits to MOA narrative. See pdf for full details/comments.	Changed to: "WHEREAS, WMATA has attempted for years to sell or convey the Trestle and the Underlying Properties outright by selling or conveying them to federal or District agencies, but has found no willing buyer or recipient; and"
Washington Metropolitan Area Transit Authority (WMATA)	17-May-25	Delete. "filed a motion of intent to intervene" and replace with "intervened" and delete "on April 26, 2021".	Strikethrough edits to MOA narrative. See pdf for full details/comments.	Changed to: "WHEREAS, on October 21, 2020, the DC Preservation League (DCPL) filed a petition with the District of Columbia Court of Appeals to review the motion allowing the raze permit, and WMATA intervened on behalf of respondent, No, 20-AA-614; and"
Washington Metropolitan Area Transit Authority (WMATA)	17-May-25	Delete. "Whereas, in September 2021, the District of Columbia Court of Appeals found that denying the raze permit would constitute an uncompensated regulatory taking and subsequently, the Mayor's Agent concluded that the permit should be approved; and"	Strikethrough edits to MOA narrative. See pdf for full details/comments.	Deleted.
Washington Metropolitan Area Transit Authority (WMATA)	17-May-25	"Whereas, on September 15, 2022, the District Court of Appeals ruled to remand..... Delete "and vacate the previous approval of the raze permit" and replace with "vacate the Mayor's Agent's previous decision and to remand for further proceedings and explanation;"	Strikethrough edits to MOA narrative. See pdf for full details/comments.	Changed to: "WHEREAS, on September 15, 2022, the District of Columbia Court of Appeals ruled to remand and vacate the Mayor's Agent's previous decision and to remand for further proceedings and explanation; and"
Washington Metropolitan Area Transit Authority (WMATA)	17-May-25	"Whereas, on May 10, 2023.....insert "following further briefing on remand" the D.C. Mayor's Agent..... delete "cleared a Decision Order and Order on Remand for WMATA's request for the permit to raze the Trestle;". Also add: "again cleared WMATA's requested raze permit for the Trestle, concluding based on clear and convincing evidence in the record that the trestle is a public safety concern and has no future use, and denial of the permit would cause unreasonable economic hardship to WMATA; and"	Strikethrough edits to MOA narrative. See pdf for full details/comments.	Changed to: "WHEREAS, on May 10, 2023, following further briefing on remand, the D.C. Mayor's Agent again cleared WMATA's requested raze permit for the Trestle, concluding based on clear and convincing evidence in the record that the Trestle is a public safety concern and has no future use, and denial of the permit would cause unreasonable economic hardship to WMATA; and"

Washington Metropolitan Area Transit Authority (WMATA)	17-May-25	add "WHEREAS, DCPL again appealed the Mayor's Agent's decision to the District of Columbia Court of Appeals, which dismissed the appeal on July 26, 2023; and"	Strikethrough edits to MOA narrative. See pdf for full details/comments.	Changed to: "WHEREAS, DCPL again appealed to the Mayor's Agent's decision to the District of Columbia Court of Appeals, which dismissed the appeal on July 26, 2023; and "
Washington Metropolitan Area Transit Authority (WMATA)	17-May-25	Whereas, the "Coalition to Save the Foundry Branch Trestle" was formed in 2022, with the goal to inform the public about potential use of the Trestle as a rehabilitated transportation asset; and.....Add ", notwithstanding DDOT's detailed study concluding that no such potential use is feasible"	Strikethrough edits to MOA narrative. See pdf for full details/comments.	No action taken.
Washington Metropolitan Area Transit Authority (WMATA)	17-May-25	Delete. "Whereas, the Signatories to this MOA are the NPS, WMATA, DC SHPO, and ACHP (Signatory or, collectively, Signatories); and"	Strikethrough edits to MOA narrative. See pdf for full details/comments.	Deleted.
District of Columbia Office of Planning SHPO	20-May-25	Comment related to "funding for implementation": SHPO was not aware the NPS funding was to be involved in this project. Please confirm and, if this is the case, provide additional information regarding the extent of funding and what specific actions the funding will be used for.	Comment in Word document.	A fundamental premise of Section 106 is the expenditure of federal monies or issuance of a permit. NPS is expending considerable staff time and resources to complete Section 106 for this undertaking. Language deleted for greater clarity.
District of Columbia Office of Planning SHPO	20-May-25	Insert new Whereas Clause: "WHEREAS, the Trestle is also historically significant as the last remaining streetcar bridge in the District of Columbia; and"	Track changes edit to MOA narrative. See Word document for full details/comments.	Change made. New whereas clause inserted.
District of Columbia Office of Planning SHPO	20-May-25	Comment related to Whereas Clause starting with "\$250,000 was..." "The text of this clause cannot be read due to the watermark and attempts to remove the watermark failed so we may have additional comments once we are able to review the text."	Comment in Word document.	Comment noted. NPS also provided a pdf of the draft MOA for review without a watermark. Whereas clause language as follows for reference: "WHEREAS, funds were allocated to DDOT's Trails Master Project in the FY 2024 D.C. budget for planning future restoration and possible purchase of the Foundry Branch Trestle Bridge in accordance with the Foundry Branch Trolley Trestle Plan Act of 2023; and"
District of Columbia Office of Planning SHPO	20-May-25	Insert new Whereas Clause: "WHEREAS, the NPS invited WMATA to sign this MOA since it owns and proposes to demolish the Trestle; and "	Track changes edit to MOA narrative. See Word document for full details/comments.	Change made. New whereas clause inserted.
District of Columbia Office of Planning SHPO	20-May-25	Comment in response to HAE Level III documentation: "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 and that this stipulation be revised accordingly."	Track changes edit to MOA narrative. See Word document for full details/comments.	NPS agrees with increased level of HAER documentation and will revise mitigation narrative to recommend HAER Level II documentation.
District of Columbia Office of Planning SHPO	20-May-25	II. Mitigation. A.1. Insert "Prior to any alteration of any portion of the Trestle and within..."	Track changes edit to MOA narrative. See Word document for full details/comments.	Change made.
District of Columbia Office of Planning SHPO	20-May-25	II. Mitigation. A.2 insert "comment" and delete "acceptance". Insert "The HAER documentation shall be revised to address any DC SHPO comments."	Track changes edit to MOA narrative. See Word document for full details/comments.	Changed to: "The HAER documentation may be revised to address any SHPO comments. Following SHPO approval, NPS shall provide a digital copy of the final documentation to the SHPO, WMATA, and the Signatories."
District of Columbia Office of Planning SHPO	20-May-25	II. Mitigation.B.1. Comment in reference to "shall provide funds": Provide funds to whom? Does this conflict with the immediately following stipulation that suggests WMATA will hire a consultant to prepare the update. Please revise to be more clear. Recommend that the first stipulation state that WMATA shall hire a qualified firm to prepare the NR update rather than "provide funds" - which is more difficult to track. The stipulation should also be revised to set a firm date by which the draft is submitted for review. As currently written, the only "deadline" relates to providing funds (or hiring a qualified firm) within two years. The duration extends for ten years. We believe the entire update should be completed and forwarded to the Keeper within five years at most.	Track changes edit to MOA narrative. See Word document for full details/comments.	See III.A.B "Complete Amendment to the Glover-Archbold Park National Register Nomination Form" of MOA for additional details.
District of Columbia Office of Planning SHPO	20-May-25	II. Mitigation.B.2. Insert "The documentation shall be revised to address any DC SHPO comments."	Track changes edit to MOA narrative. See Word document for full details/comments.	Changed to: "The HAER documentation may be revised to address any SHPO comments."

District of Columbia Office of Planning SHPO	20-May-25	Comment regarding "Interpretive Signage" mitigation. "Please refer to comments in the DC SHPO letter of May 20 2025 for detailed comments regarding how the entire Interpretive Signage stipulation should be revised. While we appreciate that this stipulation has much clearer deadlines than the previous stipulation, additional time may be required for the development of signage in light of our comments on interpretive signage, the retention of abutments, the creation of spur trails, the implementation of landscape rehabilitation etc. In short, this stipulation should be revised to be "more flexible" with regard to when and where the signage will be installed and what it addresses. Note that a additional specific comments follow."	Track changes edit to MOA narrative. See Word document for full details/comments.	While NPS appreciates your thoughtful comment, we respectfully decline to have the MOA identify the retention of the abutments or to place interpretive waysides in locations that are not accessible to all park users. 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. See comment below for additional details. Also, as stipulated in the proposed mitigation measures, the waysides would be installed in locations near Canal Road NW where they are accessible to persons of all abilities.
District of Columbia Office of Planning SHPO	20-May-25	Comment regarding "Interpretive Signage" mitigation. "WMATA has no expertise in developing interpretive signage so we recommend that NPS request WMATA to provide funds to NPS for the creation of the signage or hire a qualified firm to do the work. If WMATA insists such options are not possible (although that shouldn't be the case since they are likely doing just that for the NR update etc.), at a minimum, the stipulation should be revised to require WMATA to develop the signage in consultation with NPS and DC SHPO."	Track changes edit to MOA narrative. See Word document for full details/comments.	NPS recommends that WMATA hire a contractor to development wayside panels in consultation with NPS.
District of Columbia Office of Planning SHPO	20-May-25	II.Mitigation.C.1. Insert "In consultation with the NPS and DC SHPO and within..." Change "one" to "two" regarding installation of wayside panels. Also see comment: "Other applicable NPS interpretive signage guidelines should also be cited, not just the accessibility guidelines."	Track changes edit to MOA narrative. See Word document for full details/comments.	NPS will modify mitigation C.1 to include two wayside panels and will adhere to NPS Director's Order 52 regarding communicating the NPS mission and NPS graphic design standards including accessibility.
District of Columbia Office of Planning SHPO	20-May-25	II. Mitigation.C.3. Delete "an" and change to "opportunities". Also see comment: "This stipulation should be revised to be much more specific in terms of when and how often opportunities for comment are provided since it is not likely that one opportunity to review and comment will be sufficient. Moreover, the language should specifically state that WMATA (or their consultant) will revise the signage in response to comments until such time that NPS and DC SHPO approve of the final text, graphics, location(s) and other details. Stating that WMATA "shall consider" such comments does not guarantee any changes will occur."	Track changes edit to MOA narrative. See Word document for full details/comments.	NPS will agree to two 30-day review periods with the consulting parties. Final approval of the waysides is under the purview of the NPS and will be in compliance with Director's Order 52.
District of Columbia Office of Planning SHPO	20-May-25	II.Mitigation.C.4. Insert "within X days of receiving approval from NPS and DC SHPO."	Track changes edit to MOA narrative. See Word document for full details/comments.	NPS will modify mitigation C.4 to stipulate a 6-month timeframe from approval of the wayside panels to installation by WMATA.
District of Columbia Office of Planning SHPO	20-May-25	II.Mitigation.E. See comment: "Please refer to comments in the DC SHPO letter of May 20 2025 for detailed comments regarding how the entire Landscape Rehabilitation stipulation should be revised."	Track changes edit to MOA narrative. See Word document for full details/comments.	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.
District of Columbia Office of Planning SHPO	20-May-25	VII.Termination.A. Delete "Invited".	Track changes edit to MOA narrative. See Word document for full details/comments.	Change made.
District of Columbia Office of Planning SHPO	20-May-25	X.Reporting Insert "The NPS shall provide the other Signatories and the Consulting Parties with an annual report that summarizes the status of each stipulation in this MOA within thirty (30) days of the anniversary of the date of execution of this MOA. WMATA shall cooperate fully in providing the NPS with updates and reports on the status of its efforts to ensure timely delivery of the annual reports. "	Track changes edit to MOA narrative. See Word document for full details/comments.	NPS shall provide an annual status update to the Signatories and Consulting Parties via public PEPC website. Updates will be included on the PEPC project webpage. https://parkplanning.nps.gov/projectHome.cfm?projectID=81076 . Add language from new reporting section below.
District of Columbia Office of Planning SHPO	20-May-25	XI.Duration. Last paragraph delete "Signatories (.)"	Track changes edit to MOA narrative. See Word document for full details/comments.	Change not made.

Advisory Council on Historic Preservation	19-May-25	Proposed track changes in Word document.	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your review. NPS has taken your input under advisement while preparing the final MOA.
Advisory Council on Historic Preservation	19-May-25	Comment associated with title block "Does is need to say "U.S. Department of Interior, National Park Service"?"	Due to extent of modifications made in track changes, please see Word document for details. Individual comments are provided below.	This title block follows current NCR MOA common practice and as a result "U.S. Department of Interior" has not been added.
Advisory Council on Historic Preservation	19-May-25	Comment associated with title block "Per ACHP guidance, permit applicants are typically invited signatories (full signatories upon signing) and so their names don't appear in the title block."	Track changes edit to MOA narrative. See Word document for full details/comments.	Per ACHP guidance, NPS has changed WMATA to an Invited Signatory and upon signing, WMATA will also be a Signatory.
Advisory Council on Historic Preservation	19-May-25	Comment associated with title block "Is this supposed to be hyphenated, or not? It's hyphenated on the NPS website, but perhaps it isn't in the NR nomination?"	Track changes edit to MOA narrative. See Word document for full details/comments.	Both the National Register nomination and the NPS website hyphenates "Glover-Archbold Park". MOA will be updated to ensure consistent naming conventions are used.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "It is important to separate this out, so it is more clear for the cold reader."	Track changes edit to MOA narrative. See Word document for full details/comments.	Changed to: "WHEREAS, on March 14, 2018, WMATA submitted a Special Use Permit (SUP) application to the NPS to access federal park land within Glover-Archbold Park to "remove electric powerline, trestle bridge, concrete footers, and related materials" associated with the Foundry Branch Trestle Bridge (Trestle); and"
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "In an effort to make this more chronological and weave in the Section 106 review process, I have rearranged these clauses."	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "Does NPS have a perpetual easement to use/maintain these properties? If so, that needs to be stated in the Whereas clauses. If not, why not – and how will the trail be able to be opened/maintained again?"	Track changes edit to MOA narrative. See Word document for full details/comments.	The existing trail is located on NPS lands. The "Underlying Properties" identified in this whereas clause is in reference to the abutments and any other infrastructure owned by WMATA.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "Correct?"	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your edit. We have considered your suggestions to the draft MOA.
Advisory Council on Historic Preservation	May 19, 202	Preamble. Comment on whereas clause "This is critical context. Also, later in the agreement in one place it says that historic views ("historic viewsheds associated with the open central valley corridor in this location") will be identified, and in another it says they're already historic. If they were determined historic in the Section 106 process that's okay (and then the NR nomination paperwork can follow), and that could be mentioned here."	Track changes edit to MOA narrative. See Word document for full details/comments.	Section 8 Page 9 of the Glover-Archbold National Register nomination noted "From the beginning, the line was recognized for the scenic views it offered." The trail system is a contributing feature and is associated with events that have made a significant contribution to the broad pattern of our history.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "Is this accurate?"	Track changes edit to MOA narrative. See Word document for full details/comments.	The "network of trails" was identified as a contributing structure in the 2007 National Register nomination for Glover-Archbold Park. The nomination noted that the principal section follows the north-south alignment of Foundry Branch.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "This doesn't specify who's doing what, but it'd be great if it could."	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA. Roles and responsibilities will be clarified in the terms and conditions of the Special Use Permit.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "Is there a letter noting this fact, which could be attached as an appendix or at least referenced in this clause? Written documentation is important for the administrative record."	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment.

Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "The APE can change over the course of consultation, per ACHP guidance. Also, it should be clear what the depths (below ground) are for the APE."	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA. Archeological resources were surveyed within the LOD and a Phase IB was completed. The report noted, "As a result of substantial disturbance caused by grading, infilling, construction, and erosion throughout the APE, RK&K finds that there is no potential to encounter prehistoric or historic, buried or non-buried, archaeological resources pre-dating or postdating the trolley railway built in 1896 within the APE." No further archaeological investigations were recommended within the APE. The depth of disturbance will not exceed three feet deep.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "This is something recommended by ACHP generally and would be very helpful to know, for this Undertaking."	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "This needs to be added to the APE. Are there any historic districts in the vicinity of this Undertaking?"	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "This consultation has gone on for quite some time, so operationally for this agreement going forward, it's better to be specific about who the CPs are (vs. members of the public)."	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA. The complete list of consulting parties has been provided in Attachment B of the MOA for reference.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "It is critical to state which Tribes have been invited to consultation, and which are participating as Consulting Parties, if any."	Track changes edit to MOA narrative. See Word document for full details/comments.	Tribes with ancestral connections to the park were invited to participate in consultation but no tribe expressed interest in being a consulting party.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "Depending on when this happened, move this up or down."	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA. The Phase IA archeological investigation of the APE was completed in 2022.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "Please advise."	Track changes edit to MOA narrative. See Word document for full details/comments.	The SHPO concurred with the findings of the Phase IA Archeological Survey on April 20, 2022.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "Trying to make this somewhat chronological."	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment, supplemental information/dates have been added.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "Are either of these the Court as defined above (United States Court of Appeals for the D.C. Circuit)? If so, this doesn't need to be spelled out."	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "Trying to tie the above detailed legal chronology back into the 106 review, since they happened in parallel."	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA. Change made.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "Can anything else be retained, to minimize adverse effects?"	Track changes edit to MOA narrative. See Word document for full details/comments.	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 of the abutments as well as any other historic fabric would require preservation and conservation by the owner.

Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "Please provide details on this effort. Are there feasible ways to retain character-defining features that may benefit the public? Were certain ideas considered but dismissed, and why?"	Track changes edit to MOA narrative. See Word document for full details/comments.	Throughout this process, consulting parties and stakeholders explored preservation, stabilization, adaptive reuse, and demolition of the trestle bridge in an effort to minimize adverse effects. NPS determined that retention of footers is the safest and most sustainable method of conveying the historic presence of the trestle bridge in the valley.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "There's something in the stipulations about analysis of the historic viewsheds, perhaps to and from the Trestle Bridge/ What is that --- and can that kind of analysis happen at this point in the Section 106 process, or does it need to happen later?"	Track changes edit to MOA narrative. See Word document for full details/comments.	The goal of the landscape re-establishment 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. No new whereas clause is needed. Clarification added in mitigation section associated with landscape re-establishment.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "Could these be provided?" "Did NPS consult with that program about the timing for submissions and reviews, and other requirements?"	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA. No new whereas clause is needed.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "Is NPS the entity that will do this? Will it occur on the Underlying Properties? Is this re-establishment and re-opening mitigation, in a historic preservation sense? "	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA. No new whereas clause is needed since this information is already conveyed in the mitigation section that identifies landscape re-establishment actions, which include reopening the historic trail that traverses under the bridge. These conditions will be further delineated in the Special Use Permit issued to WMATA by NPS.
Advisory Council on Historic Preservation	19-May-25	Preamble. Comment on whereas clause "This is covered in the first paragraph."	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA. Change made.
Advisory Council on Historic Preservation	19-May-25	Stipulations. Comment "This is covered in the first paragraph."	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA. Change made.
Advisory Council on Historic Preservation		Stipulations. "Moved this reference up."	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA. Change made.
Advisory Council on Historic Preservation	19-May-25	Stipulation. New language inserted for "Reviews".	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA. The means and methods of the actual deconstruction are not covered by this MOA. WMATA's contractor will provide a proposed plan for demolition and removal. NPS will review that plan for safety and resource protection.
Advisory Council on Historic Preservation	19-May-25	Stipulations. Comment "This still makes NPS the POC, as the federal agency and adjacent landowner"	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA.
Advisory Council on Historic Preservation	19-May-25	Stipulations. Comment "These need to be in the plans."	Track changes edit to MOA narrative. See Word document for full details/comments.	All work on NPS lands will governed by the Special Use Permit, including landscape rehabilitation. NPS will review all project plans as part of the conditions of the Special Use Permit.
Advisory Council on Historic Preservation	19-May-25	Stipulations. Comment "This assumes NPS is completing this work, but perhaps that's not the case? If NPS is doing the work, is the LOD the same as WMATAs?"	Track changes edit to MOA narrative. See Word document for full details/comments.	WMATA will undertake all rehabilitation work as part of the Special Use Permit. The APE and LOD map may be updated as plans develop.

Advisory Council on Historic Preservation	19-May-25	Stipulations. Comment "Is this correct?"	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. NPS will prepare a landscape re-establishment plan for its property not exclusive to the LOD. NPS has the requisite staff expertise to accomplish this task.
Advisory Council on Historic Preservation	19-May-25	Stipulations. Comment "The phrase "interpretive plan" was in the draft. I moved it up, however... Is this a full interpretive plan for the park, or is this just about coordination for the sign?"	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. Regarding interpretation, we have revised the language for review pursuant to the SHPO comments, please see updated language.
Advisory Council on Historic Preservation	19-May-25	Minimization. Comment "This minimizes some of the demolition (the adverse effect), so it is a minimization measure and was moved up."	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. NPS asserts that avoidance was addressed in the whereas clauses.
Advisory Council on Historic Preservation	19-May-25	Minimization. Comment "It would be helpful to have this in a drawing, for the contractor - the LOD drawing?"	Track changes edit to MOA narrative. See Word document for full details/comments.	The location of the footers will be provided as an attachment to the SUP.
Advisory Council on Historic Preservation	19-May-25	Minimization. Comment "Are there other character-defining features that may be retained? What is happening with the abutments?"	Track changes edit to MOA narrative. See Word document for full details/comments.	NPS respectfully declines to have the MOA identify the retention of the abutments that are not owned by the NPS.
Advisory Council on Historic Preservation	19-May-25	Mitigation. III.II. Track changes.	Track changes edit to MOA narrative. See Word document for full details/comments.	NPS will send HAER documentation to SHPO for thirty day review. Additional suggested language drafted in the MOA is unnecessarily onerous. NPS will include additional language in the SUP ensuring that demolition will not occur before HAER documentation is complete and comments have been addressed.
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "Defer to NPS and SHPO as I'm not exactly sure how this process works. Also, does WMATA want it?"	Track changes edit to MOA narrative. See Word document for full details/comments.	NPS will provide final HAER documentation in digital format to SHPO, WMATA, and the Signatories.
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "It isn't clear whether WMATA is doing this and then submitting it to NPS or whether WMATA is providing funds to NPS for NPS to do it. Please clarify."	Track changes edit to MOA narrative. See Word document for full details/comments.	WMATA would enlist qualified staff or hire a qualified contractor to complete the update to the National Register nomination.
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "Pulled this up from below... This is something that can happen in the Section 106 process, prior to the MOA, and could be noted in the Whereas clauses – especially if, as part of the landscape re-establishment, the viewsheds will be restored."	Track changes edit to MOA narrative. See Word document for full details/comments.	In the future, NPS will complete a Cultural Landscape Report for Glover-Archbold Park to identify and evaluate historic views and vistas. Change not made.
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "Could the language for this start getting developed now? Why wait two years?"	Track changes edit to MOA narrative. See Word document for full details/comments.	This timeline will be captured as a condition in the SUP. In consultation with the NPS and SHPO and within two (2) years of the last signature on this MOA, WMATA shall hire a qualified contractor to develop and complete a draft design for two (2) interpretive waysides panels describing the Trestle. Design and installation of the wayside panels will adhere to NPS Director's Order 52 to comply with NPS sign standards and accessibility guidelines developed by the NPS Harpers Ferry Center.
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "How does their process work? Can these guidelines get over to WMATA now/could that be noted in the Whereas clauses as something that already happened?"	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment.
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "Have anything to do with the interpretive plan noted above? If it does, the Interpretive plan isn't mentioned at all here."	Track changes edit to MOA narrative. See Word document for full details/comments.	The term "Interpretive Plan" was not included in the draft MOA.
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "Is WMATA doing it or is WMATA giving NPS funds to do it?"	Track changes edit to MOA narrative. See Word document for full details/comments.	WMATA would hire a contractor to complete the design, development, fabrication, and installation of the wayside panel in coordination with NPS. Change made.

Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "This is a very busy road and having a marker there may not be appropriate.. Location is just one of the matters that needs to be discussed in consultation and/or needs to be reviewed per Stipulation I. Remove the location unless it was actually arrived upon in consensus."	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. The original language prepared by NPS in the draft MOA stands.
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "Re-establishment and replacement of natural landscape elements?"	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. Language modified to "Landscape Re-establishment'
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "This plan doesn't show the footers being protected. Please advise."	Track changes edit to MOA narrative. See Word document for full details/comments.	The location of the footers will be provided as an attachment to the SUP.
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "Should this be addressed in the Whereas clauses?"	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for comment.
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "What is this? Aren't these views already identified and if so, why not? This is something that can happen in the Section 106 process prior to the MOA."	Track changes edit to MOA narrative. See Word document for full details/comments.	In the future, NPS will complete a Cultural Landscape Report for Glover-Archbold Park to identify and evaluate historic views and vistas. Changes made.
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "Would all of the language in this agreement basically gets cut/pasted into the conditions for the SUP permit? If so, why is this mentioned here, specifically?"	Track changes edit to MOA narrative. See Word document for full details/comments.	The SUP will reflect the requirements of this MOA.
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "It is important to relate this back to the character-defining features of the historic properties, as identified in the NR nomination. Please spell that out here."	Track changes edit to MOA narrative. See Word document for full details/comments.	NPS will articulate that these are character defining features of the National Register property.
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "It is important to relate this back to the character-defining features of the historic properties, as identified in the NR nomination. Please spell that out here."	Track changes edit to MOA narrative. See Word document for full details/comments.	In the future, NPS will complete a Cultural Landscape Report for Glover-Archbold Park to identify and evaluate historic views and vistas. Please note, Section 8 Page 9 of the Glover-Archbold National Register nomination indicated "From the beginning, the line was recognized for the scenic views it offered."
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "It may be more helpful to tie this to substantial completion of the work detailed in the drawings reviewed in Stipulation I. Will it really be done in six months? Also, is WMATA providing/has WMATA provided a permanent access easement for NPS?"	Track changes edit to MOA narrative. See Word document for full details/comments.	The process for reopening the trail will be established in the SUP.
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "This is the first mention of this plan. Is it necessary? Could it be addressed, instead, in the letter from NPS?"	Track changes edit to MOA narrative. See Word document for full details/comments.	The landscape re-establishment details will be addressed in the SUP.
Advisory Council on Historic Preservation	19-May-25	Mitigation. Comment "Please consider calling this something else, as noted in other comments - re-establishment? Rehabilitation has a specific meaning in the SOI's Standards. If the trail is historic and is being rehabilitated in accordance with those standards, that should be made more clear. If it is not, and this is more like re-establishment and replacement of natural landscape elements, different language should be used."	Track changes edit to MOA narrative. See Word document for full details/comments.	Post demolition work around the trestle bridge includes several different types of activities (both natural and cultural). Re-establishment can be used to describe the larger undertaking both within and outside of the LOD.
Advisory Council on Historic Preservation	19-May-25	Post Review Discoveries. Comment "Folks are familiar with it and it is more clear than the language provided. What about Tribes?"	Track changes edit to MOA narrative. See Word document for full details/comments.	This language was developed in coordination with the DC SHPO for another MOA. It will be incorporated into the SUP.
Advisory Council on Historic Preservation	19-May-25	Post Review Discoveries. Comment "50-foot radius? What is "the area"?"	Track changes edit to MOA narrative. See Word document for full details/comments.	The area is defined as the Area of Potential Effect.

Advisory Council on Historic Preservation	19-May-25	Post Review Discoveries. Comment "Remove throughout or add periods, so D.C. is referred to consistently in the Agreement."	Track changes edit to MOA narrative. See Word document for full details/comments.	Consistent language will be utilized throughout the MOA in reference to "DC".
Advisory Council on Historic Preservation	19-May-25	Post Review Discoveries. Comment "Please see comment below."	Track changes edit to MOA narrative. See Word document for full details/comments.	See NPS response below.
Advisory Council on Historic Preservation	19-May-25	Post Review Discoveries. Comment "This language has worked in other recent agreements. In the event an unanticipated discovery includes human remains, funerary objects, sacred objects, or objects of cultural patrimony, the NPS will comply with the Native American Graves Protection and Repatriation Act (NAGPRA, 25 U.S.C. 3001 et seq.) and the accompanying regulations at 43 CFR 10. Pursuant to an applicable NAGPRA Plan of Action or as otherwise required, the NPS will ensure that any human remains are left in situ, are not exposed, and remain protected while the park complies with relevant provisions of applicable Federal, State, and/or local laws. When applicable, the NPS will consider the principles within the ACHP's Policy Statement on Burial Sites, Human Remains, and Funerary Objects, dated March 1, 2023. In implementing the Agreement, the NPS will fulfill its obligation to consult with Tribes consistent with all relevant Executive Orders, Secretary's Orders, the Department of the Interior Departmental Manual, and NPS Director's Orders and Related Guidance. NPS recognizes and considers Indigenous Knowledge in the Section 106 review process in accordance with the November 30, 2022, Guidance for Federal Departments and Agencies on Indigenous Knowledge issued by the White House Office of Science and Technology Policy and Council on Environmental Quality and the Departmental Manual (301 DM 7, Departmental Responsibilities for Consideration and Inclusion of Indigenous Knowledge in Departmental Actions and Scientific Research)."	Track changes edit to MOA narrative. See Word document for full details/comments.	This language was developed in coordination with the DC SHPO for another MOA. It will be incorporated into the SUP. Several changes made.
Advisory Council on Historic Preservation	19-May-25	Post Review Discoveries. Comment "Please see the language above for proper language."	Track changes edit to MOA narrative. See Word document for full details/comments.	Suggested language incorporated into the narrative of the MOA.
Advisory Council on Historic Preservation		Post Review Discoveries. Comment "This is already in Stipulation I."	Track changes edit to MOA narrative. See Word document for full details/comments.	This language was developed in coordination with the DC SHPO for another MOA. It will be incorporated into the SUP.
Advisory Council on Historic Preservation	19-May-25	Dispute Resolution. Comment "The changes in the next few clauses were made so that they better match the ACHP's model MOA. Model MOA/PA Amendment:"	Track changes edit to MOA narrative. See Word document for full details/comments.	Changes made.
Advisory Council on Historic Preservation	19-May-25	Reporting. "Each [insert a specific time period] following the execution of this MOA until it expires or is terminated, [Agency abbreviation] shall provide all parties to this MOA ["and the ACHP" if appropriate] a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in [Agency abbreviation]'s efforts to carry out the terms of this MOA."	Track changes edit to MOA narrative. See Word document for full details/comments.	Park addressed annual reporting requirements above. See comment on line 32 from SHPO.
Advisory Council on Historic Preservation	19-May-25	Emergency Clause. Note that there isn't an emergencies clause in here. Will the Park use the emergencies clause in the 2008 nPA or 800.12? Please note as much.	Track changes edit to MOA narrative. See Word document for full details/comments.	NPS will utilize the clause in the 2008 nationwide PA for emergencies.
Advisory Council on Historic Preservation	19-May-25	Comment "From the statute and ACHP's model MOA."	Track changes edit to MOA narrative. See Word document for full details/comments.	Changed to: "Execution of this MOA by the Signatories (NPS, SHPO, and ACHP) including Invited Signatories (WMATA upon signing) and implementation of its terms demonstrate that the NPS has taken into account the effects of this Undertaking on historic properties and afforded the ACHP a reasonable opportunity to comment."

Advisory Council on Historic Preservation	19-May-25	Signature Page. Comment "The entire title block needs to be included in the header on each page."	Track changes edit to MOA narrative. See Word document for full details/comments.	Change made.
Advisory Council on Historic Preservation	19-May-25	APE. Comment "This is difficult to read. Increase line weight. Also, add the agreement title block to all attachments."	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA
Advisory Council on Historic Preservation	19-May-25	APE. Comment "Historic properties aren't identified on this APE. What is historic? Where are the contributing features? Is the trail historic? Are there historic district boundaries nearby? What is the vertical extent of the APE?"	Track changes edit to MOA narrative. See Word document for full details/comments.	Thank you for your comment. We have considered your suggestions to the draft MOA
Advisory Council on Historic Preservation	19-May-25	LOD. Comment "This plan doesn't show the footers being protected. Please advise."	Track changes edit to MOA narrative. See Word document for full details/comments.	WMATA will provide plans/drawings as the design phase as the undertaking advances showing the location of the footers that will be retained.