

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



June 21, 2012

Mr. Alexcy Romero, Superintendent
National Park Service
National Capital Parks-East
1900 Anacostia Drive, SE
Washington, DC 20020

RE: Further Section 106 Comments Relating to the Proposed Construction of the Anacostia River Walk (ARW) Trail, Section 3 Realignment

Dear Mr. Romero:

Thank you for responding to our April 4, 2012 letter regarding the above-referenced undertaking. We have reviewed your most recent submittal and are writing to provide further comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

Since we now understand that the proposed bridge will span the historic seawalls and that the previously referenced "mitigation measures" actually consist of temporarily covering the seawalls with a material to protect them during construction, we are now able to concur with the National Park Service determination that the undertaking will have "no adverse effect" on historic built environment resources. We do, however, request to be kept informed of any concerns that may be expressed by the National Arboretum or other consulting parties with regard to effects on such resources.

With regard to archaeology we still have concerns about potential adverse effects because the precise location of the identified site in the project vicinity is only vaguely known, 51NE012, a Woodland village on the Arboretum shoreline. Because the plans are only at about the 30% level, we feel there is potential for the imprecisely located site to be affected by the project, including any construction staging areas, sediment and erosion control measures, and drainage/ surface runoff measures that would likely be a part of the undertaking. These additional construction activities need to be included in the assessment of effects in the high potential location.

The suggested measure of stopping the project only after archaeological resources are affected to record and document is insufficient protection for a highly sensitive area with known resources present. Resource identification should occur first, and then avoidance if possible. For this project, we recommend a basic geoarchaeological survey, which we find is a fast, cheap, and effective method for determining whether intact archaeological soils are present in a project area. The rationale for geoarchaeological survey and avoidance over Phase I identification survey is because the full plans are not yet available and because there is the possibility that the archaeological soils are covered by an unknown amount of fill or alluvium.

Another possible result of the geoarchaeological survey is that archaeological soils or resources are identified at or near the existing ground surface (including in the construction staging areas). If this is the case, then those locations would need protection during construction activities.

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For the purposes of the project we could issue a finding of *Conditional* No Adverse Effect for historic resources with the condition of continuing consultation on having a geoarchaeological survey conducted on the western, Arboretum side of the river.

Please contact Andrew Lewis at andrew.lewis@dc.gov or 202-442-8841 if you should have any questions or comments regarding the historic built environment. Questions or comments relating to archaeology should be directed to Ruth Troccoli at ruth.troccoli@dc.gov or 202-442-8836. Otherwise, we appreciate your cooperation in this matter and thank you for providing this additional opportunity to review and comment.

Sincerely,



Ruth Troccoli, Ph.D.
Archaeologist, District State Historic Preservation Office.

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