

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
STATE HISTORIC PRESERVATION OFFICER



September 6, 2012

Ms. Tara Morrison, Superintendent  
National Park Service  
National Capital Region  
Rock Creek Park  
3545 Williamsburg Lane, NW  
Washington, DC 20008-1207

RE: Revised Safety Improvements at Waterside Drive, Rock Creek and Potomac Parkway

Dear Ms. Morrison:

Thank you for notifying the DC State Historic Preservation Office (DC SHPO) of the most recently proposed safety improvements being considered for the Rock Creek and Potomac Parkway in the vicinity of Waterside Drive. We have reviewed the project report entitled *Reconstruction and Rehabilitation of Rock Creek and Potomac Parkway, Southbound at Waterside Drive, July 2012* and are writing to provide our comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act.

Since the above-referenced report thoroughly describes the four alternatives under consideration, identifies the historic properties that may be affected and provides a determination of effect for each alternative, this letter will not reiterate this information in any great detail. However, we note that the four alternatives include 1.) no action; 2.) restoring the original alignment; 3.) adding a merge lane by widening toward the creek; and 4.) adding a merge lane by widening toward the median. We also note our concurrence with the Areas of Potential Effects (APEs) and the lists of historic properties that were identified for each alternative.

Historic Built Environment:

With the exception of the “no action” alternative, which the National Park Service (NPS) states does not constitute an undertaking as defined at 36 CFR 800.16(y), all of the alternatives have been determined to have “no adverse effect” on historic properties since they will result in alterations to the Rock Creek and Potomac Parkway and Rock Creek Park Historic Districts that are relatively minor when compared to the overall size of the historic districts in their entirety. The alterations themselves and the materials used (e.g. the addition of a merge lane, a retaining wall, replacement vegetation, etc.) will also be in keeping with the general character of the historic districts. And, finally, conditions have been imposed per 36 CFR 800.5(b) to avoid adverse effects. These conditions include the replanting of lost trees and vegetation, the documentation of significant trees to Historic American Landscape Survey (HALS) standards, and the documentation and inventory of the relevant cultural landscape. Given these considerations, the DC SHPO concurs with the NPS’ determination that the undertaking will have “no adverse effect” on the historic built environment provided that the conditions specified above are carried out. To that end, we understand that the HALS documentation has already been submitted and accepted by the HALS office.

## Archaeology:

An archaeological management summary (Report # 521) for Phase IB investigations at Waterside Drive was recently submitted to the DC SHPO for comment. We have reviewed and concur with the results of the study, including the recommendation that the remains of Lyon's Mill (51NW240) are eligible for the National Register of Historic Places and that no additional archaeological investigations will be necessary for this undertaking. As a result, the DC SHPO also concurs with the NPS' finding of "no adverse effect" for archaeological resources provided that the following conditions are met:

1. the remains of the mill will be encapsulated to enhance their preservation;
2. the remains of the mill will be avoided during implementation of the undertaking;
3. archaeological monitoring will occur during construction to ensure that archaeological resources are avoided; and
4. trees removed from the median will be replanted as close as possible to their original locations (in coordination with the archeologist and horticulturist).

If you should have any questions or comments regarding the historic built environment, please contact me at [andrew.lewis@dc.gov](mailto:andrew.lewis@dc.gov) or 202-442-8841. If any unanticipated or post-review archaeological discoveries are encountered during this undertaking, or if you should have any questions or comments relating to archaeology in general, please contact Dr. Trocolli at [ruth.trocolli@dc.gov](mailto:ruth.trocolli@dc.gov) or 202-442-8836. Otherwise, thank you for providing the DC SHPO with this opportunity to comment.

Sincerely,



C. Andrew Lewis  
Senior Historic Preservation Specialist  
DC State Historic Preservation Office

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