



ASSESSMENT OF ACTIONS HAVING AN EFFECT ON HISTORIC PROPERTIES

A. DESCRIPTION OF UNDERTAKING

1. Park: Rock Creek Park

2. Project Description:

Project Name: Demolition of Foundry Branch Trestle

Prepared by: Bradley Krueger **Date Prepared:** 04/18/2022 **Telephone:** 202-895-6067

PEPC Project Number: 81076

Locations:

County, State: District of Columbia, DC

Describe project:

On March 14, 2018, the National Park Service received a Special Use Permit application from the Washington Metropolitan Area Transit Authority (WMATA) to enter federal land and remove the historic Foundry Branch trolley trestle and associated structures, including its abutments, from Glover Archbold Park. The trestle is owned by WMATA, but it spans National Park Service-administered land that includes a pedestrian trail. Glover Archbold Park is listed on the National Register of Historic Places (2006, NR#06001260). The trestle, constructed in the late 19th century, is a contributing structure to the Glover Archbold Park Historic District National Register site.

A trestle structural assessment (2014), commissioned by WMATA, was received by the park on June 20, 2016. The assessment was prepared in part "to assess the structural soundness" of the historic trestle. The structural assessment concluded that the trestle "is in poor condition" and the "level of deterioration of many of the members present significantly affects the structural stability of the assembly." The document recommended that certain repairs take place "in the near future" to stabilize the trestle and "to address immediate structural concerns with the present level of deterioration." The document also specified several "immediate remedial actions" including repairs to the column base and structural steel. Stabilization of the trestle by WMATA has not occurred and the trestle has become increasingly unstable. The NPS determined that the most immediate issue was safety, and has issued a permit to WMATA to fence off the area beneath and around the trestle. (See PEPC project 78133.) This included closure of the Glover Archbold trail.

On May 15, 2018, the National Park Service notified the District of Columbia's Historic Preservation Office of a determination of adverse effect for the removal of the trestle. Shortly thereafter, the District of Columbia Department of Transportation (DDOT) undertook a feasibility study for a recreational trail along the Potomac Palisades to include the corridor of land owned by WMATA to the east and west of Glover Archbold Park just north of Canal Road, NW, as well as the historic trestle. The study included a structural assessment of the trestle, which would inform a determination if the structure could be adapted for reuse as a trail bridge.

Meetings between WMATA, NPS, the District of Columbia Historic Preservation Office, the District of Columbia Department of Transportation (DDOT), the U.S. Commission of Fine Arts, and others occurred on April 11, 2018 and May 16, 2018. During these meetings, NPS expressed opposition to the demolition of the trestle and its abutments, and support for efforts to stabilize the structure in place. NPS also stated that, should the determination be made that the trestle be removed, the structure should be carefully deconstructed and documented. NPS also agreed to temporarily storing historic fabric within Glover Archbold Park until potential adaptive reuse of the trestle is determined. Conditions for this storage, and the mitigation of any adverse effects to the trestle, would be addressed in a Memorandum of Agreement with the DC HPO and any permit that the NPS would issue to WMATA. NPS stated its position during a hearing with the DC HPO Mayor's Agent Hearing Officer on March 22, 2019, during which the Mayor's Agent heard testimony regarding WMATA's request to raze

the trestle.

DDOT completed this study in early 2020, which provided several potential options for rehabilitation of the trestle. However, on January 6, 2020, DDOT's director issued a decision letter, stating that "DDOT evaluated five potential trail alignments in this area and has determined, based on cost, constructability, topography, and right-of-way impacts, that this project will not be moving forward. Therefore, DDOT will not seek to acquire ownership of the Foundry Trestle Trolley Bridge." On September 23, 2020, the Mayor's Agent issued a ruling, clearing the demolition permit and allowing WMATA's application to proceed. On October 28, 2020, the National Park Service received an updated Special Use Permit application form from WMATA for the trestle demolition, along with a demolition construction diagram. WMATA has informed NPS that it should expect to receive a demolition plan within the next several months.

NPS is proceeding with the Section 106 process, assuming that disturbance will be confined to those areas noted on the construction diagram.

Area of potential effects (as defined in 36 CFR 800.16[d])

The Area of Potential Effect (APE) consists of an approximately 7.5 acre area centered around the Foundry Branch Trestle Bridge located in Glover Archbold Park, Washington, DC (U.S. Reservations 351 and 450). This APE is inclusive of both physical and visual impacts related to the undertaking. The limits of disturbance (LOD) measures approximately 1.35 acres to a depth of 2 feet below ground surface and includes the trestle itself, abutments, railway tracks, and all associated infrastructure.

3. Has the area of potential effects been surveyed to identify historic properties?

☐ No

☒ Yes

Source or reference: Glover-Archbold Park NRHP Nomination, #06001260 (2007)
Bold, Rocky, and Picturesque: Archeological Identification and Evaluation Study of Rock Creek Park, Three Volumes (Louis Berger 2008, DCHPO Report 309, 352, 354)
Phase I Archeological Survey of Portions of Glover Archbold Park, Washington, DC (DRAFT Straughan Environmental 2012, DCHPO Report 513)
Preliminary Archeological Reconnaissance of the Proposed Crosstown Watermain-Tunnel Section, Foundry Branch Work Site, Northwest Washington, DC (Thunderbird 1981; DCHPO Report 056)
Phase I Archaeological Assessment of the Foundry Branch Trestle Bridge Demolition, Washington, DC (RK&K 2022, DCHPO Report 848)

4. Potentially Affected Resource(s):

Archeological Resources Present: Yes

Archeological Resources Notes: Within the APE, there is one known archeological site: 51NW214. This is a historic site that consists of a late 19th or early 20th century concrete and brick building foundation, possibly related to the Burrows property. The location of this foundation was mapped as part of the Phase IA archeological investigation completed by RK&K for this project (see DCHPO Report 848). While this site is within the APE, it falls outside the project's limit of disturbance, so it is not expected to be impacted by project activities. A cut-and-fill analysis completed as part of the Phase IA investigation determined that the soils within the APE have been heavily disturbed, mostly as a result of significant grading and erosion. This is likely, in part, to construction activities related to the trestle and the piping and filling of Foundry Branch. The investigation concluded that there is "no potential for encountering archaeological resources within the stream valley portion of APE. The eastern and western portions of the APE contain steeply sloped, eroded, or truncated soils and there is no potential for encountering prehistoric or historic archaeological resources pre-dating the construction of the trolley

line" (RK&K 2022, pg. 57). The NPS and DC HPO concurred with these results, as well as the recommendation that no further archeology is warranted.

Historical Structures/Resources Present: Yes

Historical Structures/Resources Notes: Within the APE are two historic structures: the Foundry Branch Trestle Bridge. The trestle is located within the Glover Archbold Park, which is a historic property listed in the National Register of Historic Places. The park is historically significant under National Register criteria A and B in the areas of community planning and development and conservation. The period of significance has been identified as 1890, when Charles Carroll Glover began purchasing property in this area for his Westover property, to 1943, the end of parkland acquisition. The trestle is a historic structure that contributes to the significance of the historic property. From the 2006 NRHP nomination: "An elevated railroad track (contributing structure) erected by the Washington and Great Falls Electric Railway Company, for service between Georgetown and Cabin John, crosses the valley near the southern end of the park. The structure retains integrity and is associated with the development in northwest Washington; today, it is owned by the Washington Metropolitan Area Transit Authority (WMATA)" (Barsoum 2006, pg. 7.4). The trestle was constructed in 1896 and in use until 1960, when service on the line ceased. The trestle then became property of DC Transit, and then WMATA in 1997. The park's historic earthen trails were established in the early 20th century. The principal trail runs in a north-south alignment along Foundry Branch directly beneath the trestle. This section of trail has been closed to visitor since 2016 due to the health and safety concerns related to the structural integrity of the trestle. Demolition of the trestle will directly affect its physical integrity, and will also impact the larger historic property, of which the trestle is a contributing resource. Therefore, this project will adversely affect historic structures and resources.

Cultural Landscapes Present: Yes

Property Name: Glover Archbold Park Cultural Landscape, CLAIMS #600114 **LCS:**
Location: ROCR

Cultural Landscapes Notes: The APE falls within the Glover Archbold Park Cultural Landscape. The park's key landscape characteristics have not yet been documented with either a Cultural Landscape Report or Cultural Landscape Inventory. However, it is assumed that many of the resources that contribute to the significance of the historic property also contribute to the designed landscape. The two landscape characteristics that exist within the APE are the trestle bridge (historic structure) and the trail that runs beneath the structure (circulation). Additionally, it is assumed that the park's vegetation, specifically its forested landscape, is also a key landscape characteristic. Removal of the trestle will adversely affect this historic structure and thus adversely affect the cultural landscape. The APE for visual effects also crosses into the Chesapeake and Ohio Canal Historic District, however, there are no planned or significant views from the towpath to the trestle that will be affected as a result of the demolition. Much of the area surrounding the trestle consists of invasive vegetation, such as bamboo, although there are some mature trees on the abutments. These trees may be impacted during demolition activities. Following the project, the area will be regraded, seeded, and replanted to restore this section of the park to a naturalistic environment. Removal of the trestle will also allow for the Glover Archbold Trail to be reopened in this area, which has been closed since 2016. Therefore, this project will adversely affect cultural landscapes.

Ethnographic Resources Present: No

Ethnographic Resources Notes: There are no known ethnographic resources within the APE.

5. The proposed action will: (check as many as apply)

Yes Destroy, remove, or alter features/elements from a historic structure

No Replace historic features/elements in kind

No Add non-historic features/elements to a historic structure

Yes Alter or remove features/elements of a historic setting or environment (inc. terrain)

☐ No Add non-historic features/elements (inc. visual, audible, or atmospheric) to a historic setting or cultural landscape

☐ No Disturb, destroy, or make archeological resources inaccessible

☐ No Disturb, destroy, or make ethnographic resources inaccessible

☐ No Potentially affect presently unidentified cultural resources

☐ No Begin or contribute to deterioration of historic features, terrain, setting, landscape elements, or archeological or ethnographic resources

☐ No Involve a real property transaction (exchange, sale, or lease of land or structures)

☐ Other (please specify): _____

6. Supporting Study Data:

(Attach if feasible; if action is in a plan, EA or EIS, give name and project or page number.)

B. REVIEWS BY CULTURAL RESOURCE SPECIALISTS

The park 106 coordinator requested review by the park's cultural resource specialist/advisors as indicated by check-off boxes or as follows:

[X] 106 Advisor

Name: Bradley Krueger

Date: 06/23/2022

Comments: The proposed project consists of the demolition of the Foundry Branch Trestle Bridge. The trestle is a character defining feature of and contributing resource to Glover Archbold Park, which is a historic property listed in the National Register of Historic Places. The trestle is one of four historic structures that contribute to the historic significance of the park and its complete removal will directly affect the physical integrity of the historic structure itself and the larger historic property. The project currently proposes that all elements of the trestle and its associated infrastructure be removed from site, thereby affecting its integrity of design, materials, workmanship, location, setting, association, and feeling. Therefore, this project will result in adverse affects to Glover Archbold Park. No adverse effects are anticipated to the C&O Canal Historic District, as no designed or significant views of the trestle exist from the canal and towpath, and the integrity of the historic district will not be diminished.

Check if project does not involve ground disturbance []

Assessment of Effect: ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☐ No Adverse Effect ☒ Adverse Effect ☐ Streamlined Review

Recommendations for conditions or stipulations: A Memorandum of Agreement is required to resolve the adverse effect, which will include a variety of conditions, stipulations, and mitigations.

Doc Method: Standard 4-Step Process

[X] 106 Advisor

Name: Allison Young

Date: 06/23/2022

Check if project does not involve ground disturbance []

Assessment of Effect: ☐ No Potential to Cause Effect ☐ No Historic Properties Affected ☐ No Adverse Effect ☒ Adverse Effect ☐ Streamlined Review

Recommendations for conditions or stipulations:

Doc Method: Standard 4-Step Process

[X] Archeologist

Name: Bradley Krueger

Date: 06/23/2022

Comments: There are no known archeological sites within the APE. A Phase IA archeological investigation completed for this project determined that the area has been significantly modified and there is little to no potential for intact archeological resources to exist. Although this project will see ground disturbing activities to a depth of 2 feet below ground surface, it is unlikely for any intact or significant archeological resources to be affected. Therefore, this project is expected to have "No Adverse Effects" to archeological resources.

Check if project does not involve ground disturbance []

Assessment of Effect: ___No Potential to Cause Effect ___No Historic Properties Affected X No Adverse Effect ___Adverse Effect ___Streamlined Review

Recommendations for conditions or stipulations: If archeological resources are discovered during the course of the project, activities must immediately halt and the ROCR Cultural Resources Program notified before work can resume.

Doc Method: Standard 4-Step Process

[X] Historical Landscape Architect

Name: Julie McGilvray

Date: 06/13/2022

Comments: Adverse Effect

Check if project does not involve ground disturbance []

Assessment of Effect: ___No Potential to Cause Effect ___No Historic Properties Affected ___No Adverse Effect X Adverse Effect ___Streamlined Review

Recommendations for conditions or stipulations:

Doc Method: Standard 4-Step Process

[X] CHOH 106 Coordinator

Name: Justin Ebersole

Date: 06/01/2022

Comments: The trestle is visible from the towpath as well as Waste Weirs 1 & 2, the spillway, and Foundry Branch Culvert, all contributing resources to CHOH. However, there are no significant views along the canal as it pertains to this location of the park. The trestle was active during the last few decades of the canal. Therefore, its loss is adverse.

Check if project does not involve ground disturbance []

Assessment of Effect: ___No Potential to Cause Effect ___No Historic Properties Affected ___No Adverse Effect X Adverse Effect ___Streamlined Review

Recommendations for conditions or stipulations: If HAER documentation has not been undertaken, I would suggest doing that after the structure has been cleared of any vegetation. Large format photos from various vantage points, such as the towpath, would also be recommended.

Doc Method: Standard 4-Step Process

[X] Architectural Conservator

Name: Courtney Magill

Date: 06/13/2022

Comments: Adverse Effect - removal of contributing historic structure from landscape

Check if project does not involve ground disturbance []

Assessment of Effect: ___No Potential to Cause Effect ___No Historic Properties Affected ___No Adverse

Effect ☒ Adverse Effect ☐ Streamlined Review

Recommendations for conditions or stipulations:

Doc Method: Standard 4-Step Process

No Reviews From: Curator, Historical Architect, Historian, Anthropologist

C. PARK SECTION 106 COORDINATOR'S REVIEW AND RECOMMENDATIONS

1. Assessment of Effect:

☐ No Potential to Cause Effects
☐ No Historic Properties Affected
☐ No Adverse Effect
☒ Adverse Effect

2. Documentation Method:

[X] A. Standard 36 CFR Part 800 Consultation

Further consultation under 36 CFR Part 800 is needed.

[] B. Streamlined Review Under the 2008 Servicewide Programmatic Agreement (PA)

The above action meets all conditions for a streamlined review under section III of the 2008 Servicewide PA for Section 106 compliance.

Applicable Streamlined Review Criteria

(Specify 1-16 of the list of streamlined review criteria.)

[] C. Undertaking Related to Park Specific or Another Agreement

The proposed undertaking is covered for Section 106 purposes under another document such as a park, region or statewide agreement established in accord with 36 CFR 800.7 or 36 CFR 800.14.

[] D. Combined NEPA/NHPA Process

Process and documentation required for the preparation of an EA/FONSI or an EIS/ROD to comply with Section 106 is in accord with 36 CFR 800.8.c.

[] E. Memo to Project File

3. Consultation Information

SHPO Required: Yes

SHPO Sent: May 11, 2018

SHPO Received: Aug 9, 2018

THPO Required: No

THPO Sent:

THPO Received:

SHPO/THPO Notes: The NPS notified the DC HPO of the adverse effect on May 11, 2018. The HPO concurred with the adverse effect determination on August 9, 2018. The NPS reinitiated Section 106 consultation on February 8, 2021.

Advisory Council Participating: Yes

Advisory Council Notes: The NPS notified the Advisory Council on Historic Preservation of the adverse effect on May 11, 2018.

Additional Consulting Parties: Yes

Additional Consulting Parties Notes: Invited consulting parties include: DC ANC 3D; DC ANC 2E; Advisory Council on Historic Preservation; Catawba Indian Nation; United States Commission of Fine Arts; Committee of 100 on the Federal City; DC Office of Planning; DC Historic Preservation Office; DC Water; DC Council; DC Department of Energy and Environment; DC Department of Parks and Recreation; DC Department of Transportation; DC Preservation League; DC Recreational Trail Advisory Committee; Delaware Nation; Delaware Tribe of Indians; Federal Highway Administration; Foxhall Community Citizens Association; Georgetown Business Improvements District; Georgetown University; Georgetown Heritage; National Capital Planning Commission; National Trust for Historic Preservation; Palisades Citizens Association; Pamunkey Indian Tribe; Pepco; Rock Creek Conservancy; Washington Area Bicyclist Association; and individual members of the public. The NPS held consulting parties meetings on March 30, 2021 and May 11, 2022.

4. Stipulations and Conditions: Following are listed any stipulations or conditions necessary to ensure that the assessment of effect above is consistent with 36 CFR Part 800 criteria of effect or to avoid or reduce potential adverse effects.

Please see "Conditions and Stipulations" in Section B and "Mitigations/Treatment Measures" in Section C.5 of the Assessment of Effects form.

5. Mitigations/Treatment Measures: Measures to prevent or minimize loss or impairment of historic/prehistoric properties: (Remember that setting, location, and use may be relevant.)

No Assessment of Effect mitigations identified.

6. Assessment of Effect Notes:

WMATA proposes to completely remove the trestle bridge, abutments, and associated infrastructure from Glover Archbold Park. As the trestle is a historic structure that contributes to the significance of the NRHP-listed Glover Archbold Park. NPS cultural resource professional applied the criteria of adverse effect to this undertaking and determined that removal of the trestle bridge and its associated infrastructure constitutes an adverse effect to Glover Archbold Park, per 36 CFR 800.5(a)(2)(i). No adverse effects are expected to occur to the Chesapeake and Ohio Canal Historic District.

The NPS initially determined that removal of the trestle bridge, abutments, and associated infrastructure constitutes an adverse effect under Section 106. The DC Historic Preservation Office (HPO) concurred with this determination on August 9, 2018. The consultation process experienced a pause while the DDOT Palisades Trolley Trail Feasibility Study was being completed. That study concluded in December 2019, and in January 2020 DDOT decided not to pursue adaptive reuse of the trail. Section 106 consultation was reinitiated with the DC HPO on February 8, 2021.

D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:

Compliance Specialist:

NHPA Specialist

Bradley Krueger

BRADLEY KRUEGER

Digitally signed by BRADLEY
KRUEGER

Date: 2022.06.27 14:23:04 -04'00'

Date: June 27, 2022

E. SUPERINTENDENT'S APPROVAL

The proposed work conforms to the NPS *Management Policies* and *Cultural Resource Management Guideline*, and I have reviewed and approve the recommendations, stipulations, or conditions noted in Section C of this form.

Signature

Superintendent:

Brian D. Joyner

Julia Washburn

Date: 6/27/2022