



## United States Department of the Interior

NATIONAL PARK SERVICE  
Region 1 – National Capital Area  
Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, DC 20008-1207

IN REPLY REFER TO:  
1.A.2 (ROCR)

June 27, 2022

Mr. David Maloney  
State Historic Preservation Officer  
Attn: Dr. Ruth Troccoli, Mr. Andrew Lewis  
DC Historic Preservation Office  
Office of Planning  
1100 4th Street, SW, Suite E650  
Washington, DC 20024

Subject: Section 106 Consultation, Determination of Effects, Demolition of Foundry Branch Trestle, Glover Archbold Park, Washington, D.C.

Dear Mr. Maloney:

The National Park Service (NPS), Rock Creek Park, is continuing Section 106 consultation with the D.C. Historic Preservation Office regarding the historic Foundry Branch Trestle Bridge in Northwest Washington, D.C. As you are aware, the Washington Metropolitan Area Transit Authority (WMATA) is proposing to demolish the trestle and all associated infrastructure due to its deteriorated condition. The elevated railway bridge is owned by WMATA and located in part within the boundary of Glover Archbold Park (U.S. Reservation 450), which is federal parkland administered by Rock Creek Park. To proceed with demolition, WMATA is required to obtain a Special Use Permit from the NPS to access parkland for the project. As issuance of a permit represents a federal undertaking, we are writing you today to provide you with our determination of effects to historic properties.

### **Background**

Built in 1896 for the Washington and Great Falls Electric Railway Company, the bridge was part of the streetcar line that connected Georgetown in the District of Columbia with Glen Echo, Maryland. Streetcar service continued through the first half of the twentieth century and

eventually ended in 1960. That same year, D.C. Transit took over ownership of the bridge, but since the streetcar line was no longer in service, its condition languished in subsequent years.

In 1997, the U.S. Court of Appeals conveyed several D.C. Transit assets to WMATA as part of a litigation settlement, including the Foundry Branch Trestle Bridge. Since that time, WMATA has conducted no preservation maintenance or repairs to the historic structure. In 2014, WMATA commissioned a structural assessment of the trestle (*Structural Condition Assessment of Georgetown Trestle*, June 25, 2014), which concluded that the trestle “is in poor condition” and that the “level of deterioration of many of the members present significantly affects the structural stability of the assembly.” The assessment 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 assessment also specified several “immediate remedial actions,” including repairs to the column bases and structural steel. It is our understanding that WMATA did not make any of the repairs recommended in the 2014 assessment.

In 2018, the District Department of Transportation (DDOT) conducted a feasibility study to determine if the bridge could be rehabilitated and adaptively reused as a multi-use trail between the Foxhall neighborhood and Georgetown (*Feasibility Study, Palisades Trolley Trail and Foundry Branch Trolley Trestle Bridge*, December 2019). The study determined that while it is technically feasible to rehabilitate the structure, to do so would require significant funding. Following the study, DDOT decided not to pursue the rehabilitation and adaptive reuse of the trestle. This determination was followed by a September 23, 2020, ruling from the D.C. Mayor’s Agent for Historic Preservation to allow WMATA to proceed with an application to the District of Columbia to raze the bridge. It is our understanding that this ruling has been appealed by parties who are opposed to the demolition of the trestle, with a decision from the Court of Appeals pending.

Today, the trestle is in a state of extreme disrepair. Due to its failing structural integrity, the NPS authorized WMATA to fence off the parkland directly under the structure in 2018, thereby closing off a portion of the Glover Archbold Trail that goes beneath it. The NPS is concerned about the safety of its visitors and staff as the structure continues to languish. There is also concern for the various sewer and stormwater management infrastructure that lies directly beneath the trestle.

The Foundry Branch Trestle Bridge is the last remaining streetcar bridge in the District of Columbia. The NPS has previously voiced its support for stabilizing and preserving the trestle and continues to maintain this position. While the NPS is opposed to the demolition of the trestle, the structure is owned by WMATA, so our agency has no authority over its ultimate disposition. While we support the retention and preservation of the trestle, a viable solution has not yet been presented for this to happen. For this reason, we are moving forward with the Section 106 review of the demolition.

## **Current Project**

WMATA currently proposes to demolish the trestle bridge and all associated infrastructure. This includes the concrete abutments, railway tracks, and cables. Infrastructure would be removed to a depth of two feet below grade. NPS land would be used for staging equipment and materials, as well as for site access. Following demolition, the site would be restored to naturalistic conditions and the Glover Archbold Trail reopened. Please see the enclosed map showing the project area.

## **Assessment of Effect**

In accordance with the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA) (54 U.S.C. 306108), and the Advisory Council on Historic Preservation's implementing regulations (36 CFR Part 800), the NPS has considered the effects of this undertaking to historic properties, prepared an Assessment of Effects document, and applied the Criteria of Adverse Effect, as defined in 36 CFR Part 800.5, to historic properties within the Area of Potential Effects (APE).

The NPS originally initiated Section 106 consultation with the D.C. Historic Preservation Office on May 11, 2018. At that time, the NPS also requested concurrence with its finding of "Adverse Effect." The NPS received a response from your office on August 9, 2018, concurring with the determination that demolition of the trestle would constitute an "Adverse Effect" on historic properties. Consultations were subsequently paused as DDOT conducted their trail feasibility study, as the result of the study and potential adaptive reuse could have avoided or minimized the adverse effect. Following DDOT's decision not to pursue adaptive reuse of the trestle, the NPS reinitiated Section 106 consultation with your office on February 8, 2021 and invited consulting parties to participate in the Section 106 review of this project (please see enclosed list of invited consulting parties). The NPS hosted two virtual consulting party meetings via the Microsoft Teams platform on March 30, 2021, and May 11, 2022.

### *Area of Potential Effect*

The APE is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties (36 CFR 800.16(d)). For demolition of the trestle bridge, the APE consists of an approximately 7.5-acre area centered around the Foundry Branch Trestle Bridge. This APE is inclusive of both physical and visual impacts related to the undertaking. The limits of disturbance, which solely relates to direct physical effects upon an area, measures approximately 1.35 acres to a depth of two feet below ground surface and includes the trestle itself, abutments, railway tracks, and all associated infrastructure. Please find enclosed a map of the APE for your review.

### *Historic Properties*

Historic property means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (36 CFR 800.16(l)). Within the APE, the NPS identified two historic properties: Glover Archbold Park and the Chesapeake and Ohio (C&O) Canal National Historical Park.

Glover Archbold Park was listed to the National Register of Historic Places in 2006 (#06001260). Located within the Foundry Branch stream valley, the park was established between 1924 and 1943 for park and playground purposes. As a park and playground, it is also a historically designed cultural landscape. 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. Anne Archbold also bequeathed land intended for the park. The trestle, which is part of the Washington and Great Falls Electric Railway Company's streetcar line from Georgetown to Glen Echo, is a historic structure that contributes to the significance of the historic property. The trestle was constructed in 1896 and was 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 network of earthen trails was established in the early twentieth century and are considered historic structures that contribute to the significance of the park. 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 2018 due to the health and safety concerns related to the structural integrity of the trestle.

C&O Canal National Historical Park was listed in the National Register of Historic Places in 1966 and had its boundary increased in 2014 (#66000036, #14001236). Built between 1828 and 1850, the canal runs 184.5 miles from Georgetown, D.C., to Cumberland, Maryland. The period of significance has been identified as 1828 to 1924. The federal government acquired the canal in 1938 and since then has repaired, restored, and stabilized many of the badly deteriorated locks, culverts, and other structures. The district is historically significant in the areas of conservation, architecture and engineering, military, and commerce and transportation. A small portion of the historic district falls within the APE for potential visual effects, as the trestle can be seen from the towpath.

#### *Determination of Effect – Historic Properties*

NPS cultural resource professionals reviewed the proposed undertaking and determined that demolition of the trestle will adversely affect the historic characteristics of Glover Archbold Park that qualify it for inclusion 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. Removal of the trestle will resolve the present health and safety issue that it poses and allow the segment of Glover Archbold Trail that runs beneath it to reopen.

The APE also includes a portion of the C&O Canal Historic District, as the trestle can be seen from the canal and towpath in Georgetown. While the trestle and streetcar line were in operation during the last years of canal operation, no historically designed or significant views exist from the canal and towpath to the trestle. While removal of the trestle will result in a visual effect, it

does not rise to the level of adverse effect, as no aspect of the historic district's integrity will be diminished. Following removal of the trestle, the area will be restored to a naturalized environment, so much of this view will remain the same.

Therefore, this project is anticipated to result in "Adverse Effects" to Glover Archbold Park and "No Adverse Effects" to the C&O Canal Historic District. Please see the enclosed Assessment of Effects form for additional details.

### *Determination of Effect - Archeology*

Regarding potential impacts to archeology, there is one known archeological site within the APE: 51NW214. This is a historic site that consists of a late nineteenth or early twentieth 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 because of significant grading and erosion. This is likely, in part, to construction activities related to the trestle, the piping of Foundry Branch, and the filling of the surrounding land. 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 Archeologist concurred with these results, as well as the recommendation that no further archeology is warranted.

Based on the results of the Phase IA investigation, the archeological potential of the project area is low, and it is unlikely that intact deposits will be affected, as excavation will stay within previously disturbed soils. Therefore, this project is anticipated to result in "No Adverse Effects" to archeological resources.

### **Next Steps**

The NPS and WMATA will continue to work with your office, the Advisory Council on Historic Preservation (ACHP), and other consulting parties to resolve the adverse effect related to the demolition of the Foundry Branch Trestle Bridge. This will require the development and execution of a Memorandum of Agreement (MOA), which will outline appropriate conditions, stipulations, and mitigations that are commensurate to the loss of this contributing resource. We will share with you and the consulting parties a draft of the MOA once it is available. If necessary, we will host another consulting parties meeting if there is a desire to review the MOA as a group. We will also formally notify the ACHP of our finding of adverse effect.

### *Consulting Parties Feedback*

The project's consulting parties are in favor of preserving the Foundry Branch Trestle Bridge, either in and of itself or for its potential adaptive reuse as a multi-use trail. This desire was reflected in comments made during the May 11, 2022, consulting party meeting and those submitted afterwards. Consulting parties point to the historic significance of the trestle and the fact that it is the last remaining streetcar bridge in Washington, D.C. Others highlight the potential benefit that a trail would bring to the surrounding community. Frustrations have been expressed over the decision not to adaptively repurpose the trestle as part of a new trail, as some feel that complete removal of the trestle eliminates the possibility of a new trail being constructed in the future. It should be noted that none of the consulting parties who are actively participating in consultation have voiced their support for demolition of the trestle. The NPS values the input of its consulting parties and will continue to engage with them as the Section 106 process continues.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact Bradley Krueger, Cultural Resources Program Manager, by telephone at 202-895-6067 or by email at [bradley\\_krueger@nps.gov](mailto:bradley_krueger@nps.gov). If Mr. Krueger is not available, please contact Resource Manager Nick Bartolomeo by telephone at 202-895-6067, or by email at [nick\\_bartolomeo@nps.gov](mailto:nick_bartolomeo@nps.gov).

Thank you for your continued assistance.

Sincerely,

*Brian D. Joyner* signing on behalf of  
Julia Washburn  
Superintendent

Enclosure: Project Map, APE Map, Assessment of Effect Form, Consulting Parties List

Foundry Branch Trestle Demolition  
Consulting Parties List

Organization	Contacts	Participating
ANC 3D	J.P. Szymkowicz	Yes
ANC 2E	Anna Landre	No
Advisory Council on Historic Preservation	Christopher Wilson	Yes
Catawba Indian Nation	Chief William Harris	No
	Wenonah Haire	
Commission of Fine Arts	Dan Fox	Yes
	Thomas Luebke	
	Frederick Lindstrom	
Committee of 100 on the Federal City	n/a	No
DC Council	Mary Cheh	Yes
	Cole Wogoman	
	Dee Smith	
	Amy Sinnenberg	
DC Department of Energy and Environment	Cecilia Lane	No
DC Department of Parks and Rec	Delano Hunter	No
DC Department of Transportation	Michael Alvino	Yes
DC Historic Preservation Office (SHPO)	David Maloney	Yes
	Andrew Lewis	
	Ruth Troccoli	
	Timothy Dennee	
DC Office of Planning	Andrea Limauro	No
	Erkin Ozberk	
DC Preservation League	Rebecca Miller	Yes
DC Recreational Trail Advisory Committee	Jack Koczela	Yes
	Elizabeth McGowan	
DC Water	Louis Arguello	Yes
	Mark Babbitt	
	Ella Garcia	
Delaware Nation	Jason Ross	No
	Erin Thompson	
	Sonnie Allen	
Delaware Tribe of Indians	Susan Bachor	No
Federal Highway Administration	Michael Hicks	No
Foxhall Community Citizens Association	Robert Avery	Yes
	Amir Hudda	
Georgetown BID	Will Handsfield	No
	David Levy	
Georgetown University	Christopher Murphy	Yes
	Kelly Blevins	

	Heidi Tseu	
Georgetown Heritage	Jeffrey Nichols	No
Georgetown Historical Society	Betsy Moran	No
National Capital Planning Commission	Diane Sullivan	Yes
	Lee Webb	
	Marcel Acosta	
	Michael Weil	
	Matthew Flis	
	Johanna McCrehan	
National Trust for Historic Preservation	Paul Edmondson	Yes
	Robert Nieweg	
	Betsy Merritt	
Palisades Citizens Association	Tricia Duncan	Yes
	Anne Ourand	
	Nick Keenan	
Pamunkey Indian Tribe	Chief Robert Gray	No
Pepco	Ka Bria Richardson	No
	Michael Walsh	
Rock Creek Conservancy	Jeanne Braha	No
Washington Area Bicyclist Association	Greg Billing	No
Public	John Bray	Yes
Public	Brett Young	Yes
Public	David Cranor	Yes
Public	Ann Haas	Yes
Public	Kent Slowinski	Yes