

## Notes from Foundry Branch Trestle Demolition Section 106 Consulting Parties Meeting #2

National Park Service, Rock Creek Park

May 11, 2022

Meeting Notes

REVISED 6-23-2022

In Attendance (virtually): Bradley Krueger (NPS-ROCR), Nick Bartolomeo (NPS-ROCR), Jim Ashe (WMATA), Brett Young (public), Karen Hutchins-Keim (RK&K), Greg O'Hare (RK&K), Zachary Burt (DC Preservation League), Amy Sinnenberg (DC Council), Chris Wilson (Advisory Council on Historic Preservation), Michael Alvino (DC Department of Transportation), Heidi Tseu (Georgetown University), Betsy Merritt (National Trust for Historic Preservation), Jeff Winstel (WMATA), Dan Fox (U.S. Commission of Fine Arts), Andrew Lewis (DC Historic Preservation Office), Tricia Duncan (Palisades Citizens Association), Allison Young (NPS-NCRO), Nick Keenan (Palisades Citizens Association), Rebecca Miller (DC Preservation League), Amir Hudda (Foxhall Community Citizens Association), Jack Koczela (DC Recreational Trail Advisory Committee), Dee Smith (DC Council), Kent Slowinski (public), Lee Webb (National Capital Planning Commission), Louis Arguello (DC Water)

1. Introductions of attendees
2. Mr. Krueger gave a presentation that covered the following topics (please see the PowerPoint presentation that was distributed to consulting parties for details):
  - a. Overview of the project description – WMATA is still proposing the complete demolition of the trestle bridge and all associated infrastructure to a depth of 2 feet below grade.
  - b. Section 106 process update – The NPS has established the project's Area of Potential Effect (APE), identified historic properties within the APE, and applied the criteria of adverse effect to those properties.
  - c. Review of the Phase IA archeological investigation results – Due to substantial disturbance caused by grading, infilling, construction, and erosion, there is no potential to encounter prehistoric or historic archeological resources within the project area. NPS and the SHPO have concurred with these findings.
  - d. Review of the APE – The boundary includes both the physical limits of disturbance and any potential visual effects.
  - e. Review of historic properties within the APE – Glover Archbold Park (historic property) and the Chesapeake and Ohio Canal National Historical Park (historic district) are located within the APE. The trestle bridge is a historic structure that contributes to the significance of the NRHP-listed Glover Archbold Park.
  - f. Determination of Effects – The NPS maintains that complete removal of the trestle will result in an Adverse Effect to the trestle bridge and Glover Archbold Park. No Adverse Effects are anticipated to archeological resources within the APE. No Adverse Effects are anticipated to the Chesapeake & Ohio Canal Historic District.
  - g. Resolution of Effects – A Memorandum of Agreement (MOA) is required to resolve the adverse effect. Mitigation is required when an undertaking will result in an adverse effect to a historic property. Mitigation involves compensation for the loss or

diminishment of a history property. The NPS is currently considering the following for potential mitigation:

- i. Documentation of the trestle bridge by the Historic American Engineering Record (HAER), to include a report, photographs, and measured drawings.
  - ii. Development of interpretative media that could include an on-site wayside exhibit and/or an online GIS story map.
  - iii. Land transfer from WMATA to NPS for the trolley right-of-way that runs through the southern section of Glover Archbold Park.
- h. Next steps – NPS will submit their finding of Adverse Effect to the SHPO and ACHP, and begin drafting the MOA. If necessary, a third consulting parties meeting will be held to review the MOA.

### 3. Questions and Responses Section

Q: Could the abutments be left in place?

A: From the NPS representative: The NPS has considered this option. Leaving the abutments in place would pose a safety risk to visitors and require additional infrastructure such as fencing and barriers.

Q: Conditions in the neighborhood have changed. DC has purchased the Georgetown Day School, and there will be an upcoming change in City Council Ward 3 leadership. The bridge could be used to connect the Georgetown neighborhood to the Palisades neighborhood.

A: From the NPS representative: DDOT has not changed their position regarding adaptive reuse of the trestle.

Q: What is the timeline for next steps?

A: From the NPS representative: NPS will draft a Memorandum of Agreement (MOA) for the consulting parties to review by the end of June, with an anticipated execution in the fall.

Q: Is WMATA open still to saving and adaptive reuse of the trestle?

A: From the WMATA representative: WMATA's goal is to make the area safe while remaining consistent with its mission, and is receptive to another agency taking ownership of the bridge.

Q: Will digging and equipment be confined to the limits of disturbance? Will it also occur within the Area of Potential Effect?

A: From the NPS representative: Digging and equipment use will be confined to the limits of disturbance as shown on the presentation map. The Area of Potential Effect shows where there will be visual effect and impacts.

Q: Has NPS considered putting signs, plaques on site (following the demolition)?

A: From the NPS representative: NPS is open to various types of interpretation, both physical (on site) signs and virtual.

Q: What if circumstances change, how does this impact the timeline for Section 106?

A: From the NPS representative: At this point, we are still proceeding with the MOA. If the MOA is finalized and the situation changes, the MOA can be amended.

Comment: DDOT dropped their rehabilitation and trail plan due to opposition from Georgetown University. The commentor stated that if the university dropped its opposition, it could be beneficial to efforts to save the trestle.

Q: What was the level of involvement by NPS in the “no adverse effect” determination for the Chesapeake and Ohio Canal viewshed? And can NPS release the archeology report?

A: From the NPS representative: Rock Creek Park worked with the staff at the Chesapeake and Ohio Canal to review the area and identify any impacts. NPS clarified that archeological impacts are separate from visual resource impacts, and that the integrity of the C&O Canal Historic District would not be impacted by the removal of the trestle. NPS agreed to a request from an attendee that the archeological report could be released after sensitive information is redacted, but noted that this could take time. The Regional NPS staff also weighed in, stating that legal authority for Section 106 is delegated to the park Superintendent, and that the NPS Regional staff exists to support the parks.

Comment: A mitigation for the loss of a transportation facility could be to transfer the WMATA property to a transportation agency.

Response: From DDOT’s representative: The feasibility study has significant amounts of information about the structure, and DDOT is happy to share that information with NPS for documentation purposes. Also, in 2019, DDOT determined there wasn’t a transportation function for the bridge, as the full right of way into Georgetown was not intact. In addition, the purchase by DC of the Georgetown Day School has not caused DDOT to reconsider its position against taking ownership of the trestle.

Comment: From DC Historic Preservation Office: Rehabilitation of the trestle is our preference. The Mayor’s Agent’s determination has been appealed, no decision yet. We support NPS’s proposed mitigations (described in the presentation), but a HAER survey and signage would be the minimum we would accept. The HPO is interested in investigating safety measures on the abutments further, and asked that historic photos be incorporated into any wayside. And if a new bridge is constructed, the abutments can be reused. HPO supports transfer of WMATA right of way to NPS, including the WMATA-owned right of way to the east outside the boundary of the park.

Response: From the NPS representative: We can consider transfer of the area to the east.

Q: From ACHP: It is helpful that NPS is open to changes if the situation changes. Why is Georgetown opposed to the trail, and can the university talk with DDOT about these concerns?

A: From Georgetown University’s representative: There were questions and concerns from the university and the ANC about how the trail would end (at Prospect Street NW). Georgetown University did engage in conversation with DDOT, and talked through the different models.

Comment: There were comments from participants that the university’s opposition was stated directly by a top university official and that there is a written record of it. The Georgetown University representative stated that they are happy to discuss the trail further. There was further discussion that the trail was in the university’s latest campus plan.

Comment: DC Water’s representative stated that there was significant water and sewer infrastructure under and near the trestle, and that any demolition plans would require DC Water review. WMATA’s representative said the agency would continue discussions with DC Water.

Q: Who pays for any mitigation?

A: From the NPS representative: Payment for mitigation would be WMATA's responsibility.

Comment: The DC Preservation League would like to have a vestige of the trestle left on site. Also, demolition is not a foregone conclusion. NPS said it will reassess the possibility of the retention of some of these elements.

Q: Is the extent of the mitigation the property transfer?

A: From the NPS representative: There are three main elements to the mitigation: Property transfer, documentation of the trestle, and development of interpretive media. In response to further comment, NPS noted that mitigation under Section 106 is for the adverse effect, which is the loss of the historic structure.

Q: Does WMATA have an updated cost estimate?

A: From WMATA's representative: The latest cost estimate is what was released at the Mayor's Agent's hearing.

Q: Has funding been allocated by WMATA (for the trestle demolition and mitigation)?

A: From WMATA's representative: WMATA is prepared to commit funding for demolition.

Comment: From DC HPO representative: Maybe something further needs to be considered for mitigation. It could be for other historic structures in Glover Archbold Park. This could include the remnants of a historic springhouse (which is located in the northern section of the park, below Massachusetts Avenue). The ACHP representative noted also that mitigation has to be commensurate with the loss.

Comment: From DC Preservation League representative: This is the last remaining trestle in the city. The multiple property documentation form for DC transportation infrastructure is out of date and could be updated as part of mitigation.

Q: Can we tap into the transportation infrastructure bill for funding for this restoration?

A: From the NPS representative: NPS does not own the bridge and cannot apply for funding to restore it. The WMATA representative noted that the agency's efforts are focused on their existing infrastructure, but agreed to look into the agency's eligibility for this funding. The DDOT representative noted as well that the trestle is not DDOT property.

NPS closed the meeting by reminding attendees that comments on mitigation were being received through May 25, 2022.