

## **Appendix A. Section 106 Consultation Correspondence**



January 20, 2023

Ms. Tara Morrison  
Superintendent  
National Park Service  
National Capital Parks East  
1900 Anacostia Drive, SE  
Washington, DC 20020

RE: Initiation of Section 106 Consultation for Stream Wetland Restoration Projects at Fort Dupont

Dear Ms. Morrison:

Thank you for initiating consultation with the District of Columbia State Historic Preservation Officer (SHPO) regarding the above-referenced undertaking. We have reviewed the project submittal and are writing to provide initial 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.

We understand that the National Park Service (NPS), in partnership with the District Department of Energy and Environment (DOEE), is proposing to restore the streams and wetlands shown in the attached map *except for* the area referred to as Project Area (PA)-10, specifically the areas of Anacostia Park located along the banks of the river and adjacent to the historic seawall. We have been consulting informally with NPS and DOEE regarding these particular areas for quite some time and had considered potentially using this project as a “model” for future stream restoration projects that involved the seawall but we understand NPS policies relating to contaminated soils have made restoration in this location cost prohibitive at this time. We look forward to consulting further about the Anacostia Park stream and wetland restorations if they are proposed again in the future.

The remaining project areas 1-9 are located within the boundaries of Fort Dupont, which contributes to the significance of the National Register of Historic Places-listed Civil War Defenses of Washington/Fort Circle Parks Historic District. We agree with the list of proposed consulting parties for these projects and concur that the draft Area of Potential Effect is nearly sufficient but recommend that it be expanded slightly to include the areas outside of park boundaries where the direct and indirect effects of construction and the fully completed project will be perceptible (e.g. across Massachusetts and Alabama Avenues, SE).

With regard to archaeology, we have reviewed the project information and the results of the Phase I survey that was conducted specifically for this project and have determined that the Fort Dupont stream restoration projects will have “no adverse effect” on archaeological resources.

From a historic built environment standpoint, we do not anticipate any adverse effects from “daylighting” the streams themselves but we do not yet have enough information about the culverts and any other built environment resources that may be affected to make a determination of effect. We request the NPS and/or DOEE to provide us with photographs and any information that may be known about dates of construction, association with any historically significant building campaigns (e.g. the Civilian Conservation Corps) and any other relevant information that may address the question of whether or not these structures are historically significant. More detailed information about the changes that are proposed will also be required but we will provide further comments once we have had an opportunity to review this additional information.

Ms. Tara Morrison, Superintendent  
Initiation of Section 106 Consultation for Stream Wetland Restoration Projects at Fort Dupont  
January 20, 2023  
Page 2

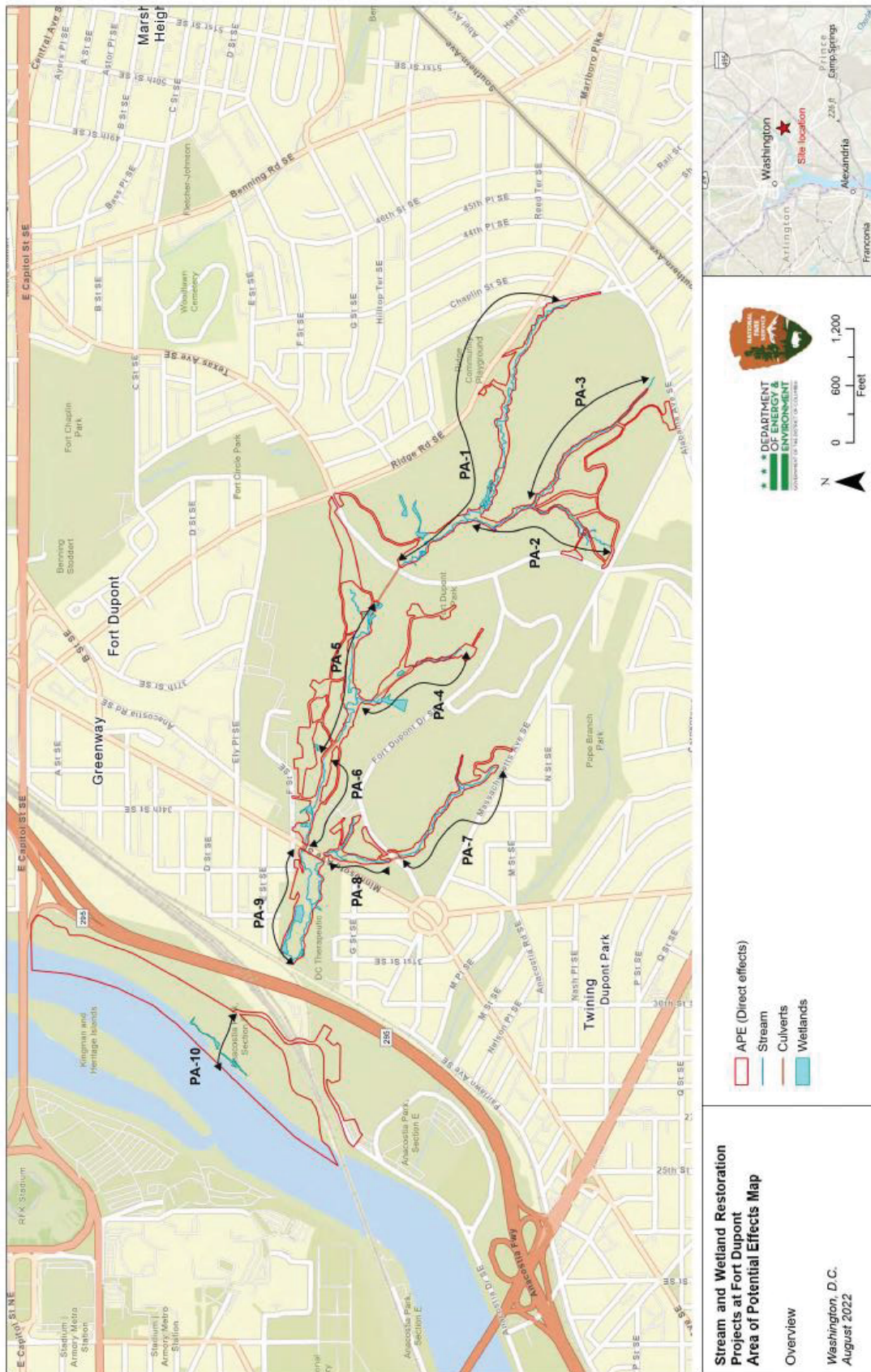
If you should have any questions or comments regarding archaeology, please contact Ruth Trocolli at [ruth.trocolli@dc.gov](mailto:ruth.trocolli@dc.gov) or 202-442-8836. Questions or comments relating to the historic built environment may be addressed to me at [andrew.lewis@dc.gov](mailto:andrew.lewis@dc.gov) or 202-442-8841. Otherwise, we look forward to consulting further with NPS, DOEE and other parties to complete the Section 106 review of this undertaking.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Lewis", is written over the printed name.

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

23-0308  
cc: Josh Burch, DOEE





The Stables Building  
2081 Clipper Park Road  
Baltimore, MD 21211  
410.554.0156  
www.biohabitats.com

## MEMORANDUM

Date: March 10, 2023

To: Josh Burch, DOEE

From: Doug Streaker and Sarah Roberts, Biohabitats, Inc.

**RE: Initiation of Section 106 Consultation for Stream Wetland Restoration Projects at Fort Dupont**  
**Subject: Response to APE and Culvert Comments**

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The following photograph log and attachment map were prepared by Biohabitats Inc. in response to the District of Columbia State Historic Preservation's (SHPO's) letter dated January 20, 2023. SHPO comments included a request for photographs and any information about the culverts effected by proposed restoration outlined in the Section 106 consultation for the Fort Dupont Creek – Stream and Wetland Restoration Environmental Assessment (EA) and the recommendation to slightly expand the Area of Potential Effect (APE) to include the areas outside of park boundaries where the effects of construction and the fully completed project will be perceptible (e.g. across Massachusetts and Alabama Avenues, SE). Below are photographs of each culvert and two associated wooden footbridges and information on culvert dimension and material. We do not have the dates of or information regarding their installation. Also attached is a map showing the location of the culvert photos (labeled by photo number that matches the photo number in the captions) and the revised APE boundary that now extends across the adjacent street at construction access and staging areas. This revised to the APE now accounts for temporary indirect effects for those living across from the access and staging areas (e.g., construction vehicles going in and out and impacted landscape).





Photo 1: PA-01 – 18" reinforced concrete pipe (RCP) storm drain pipe being daylighted in wooded area and replaced with RSC



Photo 2: PA-01 – 42" corrugated metal pipe (CMP) culvert under NPS trail being removed/daylit





Photo 3: PA-04 – 36" reinforced concrete pipe (RCP) culvert under wooded area being removed/daylit



Photo 4: PA-04 – abandoning several small pipes in place at the head of gully





Photo 5: PA-05 – 66" corrugated metal pipe (CMP) culvert that is completely undermined and being removed/daylit



Photo 6: PA-05 – 84" corrugated metal pipe (CMP) culvert under footpath/lawn area being replaced







Photo 7: PA-06 – 8-ft by 5-ft concrete box culvert under NPS access road being replaced.



Photo 8: PA-06 – 24" reinforced concrete pipe (RCP) storm drain pipe being daylight in grass area upstream of Minnesota Ave and replaced with stormwater cell







Photo 9: PA-08 – 2 wooden footbridges and an associated drainage pipes (24" RCP and twin 24" CMP) being removed/daylit and replaced with boardwalk



Photo 10: PA-08 – 2 wooden footbridges and an associated drainage pipes (24" RCP and twin 24" CMP) being removed/daylit and replaced with boardwalk

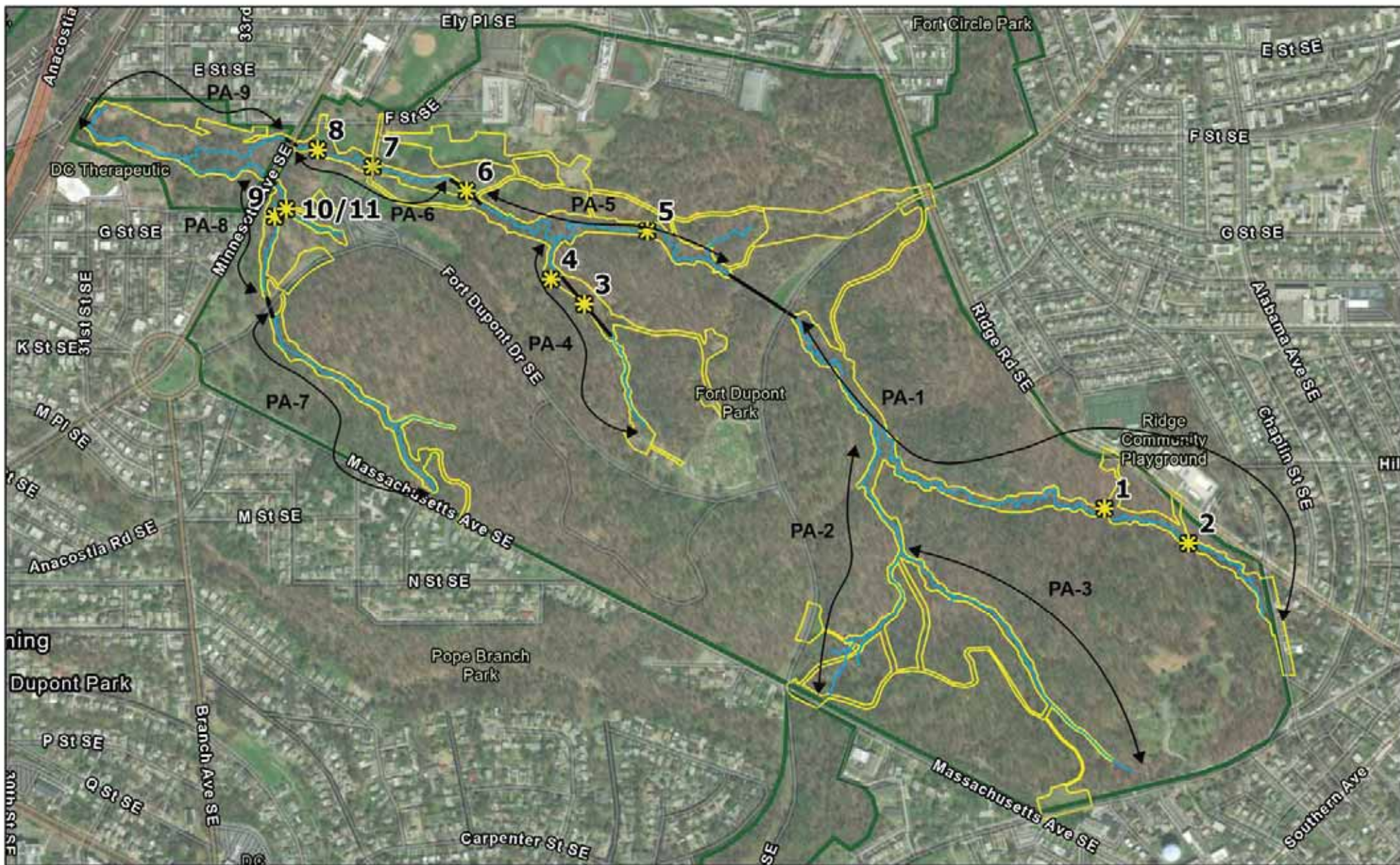






Photo 11: PA-08 – 2 wooden footbridges and an associated drainage pipes (24" RCP and twin 24" CMP) being removed/daylit and replaced with boardwalk





# **FORT DUPONT CREEK - STREAM AND WETLAND RESTORATION PROJECT APE & Culvert Location Map**

Washington, D.C.  
March 2023

- Culvert/Pipe Reference #
- Culverts
- APE (Direct effects)
- NPS Park Boundaries
- Stream



DEPARTMENT OF ENERGY & ENVIRONMENT  
BUREAU OF LAND MANAGEMENT







March 14, 2023

Ms. Tara Morrison  
Superintendent  
National Park Service  
National Capital Parks East  
1900 Anacostia Drive, SE  
Washington, DC 20020

RE: Conclusion of Section 106 Consultation for Stream Wetland Restoration Projects at Fort Dupont

Dear Ms. Morrison:

In response to our letter of January 20, 2023, the District Department of Energy and Environment (DOEE) recently provided photographs of the existing culverts and related infrastructure that will be affected by the above-referenced restoration projects. Although no dates of construction or other historical information was available, the photographs were sufficient for us to determine that the culverts and infrastructure are very utilitarian in nature (i.e. metal and concrete culverts, simple concrete headwalls, wooden footbridges) and not eligible for listing in the National Register of Historic Places. A map indicating a slightly expanded APE was also provided for our review. This letter provides additional 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.

As previously indicated, “daylighting” the streams will not adversely affect historic Ft. Dupont or any archaeological resources. Since we now know that no historically significant culverts or infrastructure will be affected, we have determined that this overall undertaking will have “no adverse effect” on historic properties.

Again, we note that this determination does not apply to the area referred to as Project Area (PA)-10, specifically the areas of Anacostia Park located along the banks of the river and adjacent to the historic seawall, since those areas are not included in the current undertaking.

If you should have any questions or comments regarding archaeology, please contact Ruth Trocolli at [ruth.trocolli@dc.gov](mailto:ruth.trocolli@dc.gov) or 202-442-8836. Questions or comments relating to the historic built environment may be addressed to me at [andrew.lewis@dc.gov](mailto:andrew.lewis@dc.gov) or 202-442-8841. Otherwise, thank you for providing this opportunity to review and comment.

Sincerely,

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

23-0308  
cc: Josh Burch, DOEE

[EXTERNAL] Re: FW: NPS NACE- Section 106 Consultation- Fort Dupont Stream Restoration

Kaleigh Pollak <kaleigh.monacan@gmail.com>

Tue 1/3/2023 3:00 PM

To: Weldon, Daniel T <daniel\_weldon@nps.gov>

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

Good Afternoon,

Thank you for contacting us about the proposed project. The Monacan Indian Nation is a federally recognized sovereign tribe, headquartered on Bear Mountain in Amherst County. Citizens of the Nation are descended from Virginia and North Carolina Eastern Siouan cultural and linguistic groups, and our ancestral territory includes Virginia west of the fall line of the rivers, sections of southeastern West Virginia, and portions of northern North Carolina. At this time, the active Monacan consultation areas include:

**Virginia:** Albemarle, Alleghany, Amherst, Appomattox, Augusta, Bath, Bedford, Bland, Buchanan, Buckingham, Campbell, Carroll, Charlotte, Clarke, Craig, Culpepper, Cumberland, Dickenson, Floyd, Fluvanna, Franklin, Frederick, Giles, Goochland, Grayson, Greene, Halifax, Henry, Highland, Lee, Loudoun, Louisa, Madison, Mecklenburg, Montgomery, Nelson, Orange, Page, Patrick, Pittsylvania, Powhatan, Prince Edward, Pulaski, Rappahannock, Roanoke, Rockbridge, Rockingham, Russell, Scott, Shenandoah, Smyth, Tazewell, Warren, Washington, Wise, and Wythe Counties, and all contiguous cities.

**West Virginia:** Greenbrier, Mercer, Monroe, Pendleton, Pocahontas, and Summers Counties.

**North Carolina:** Alamance, Caswell, Granville, Orange, Person, Rockingham, Vance, and Warren Counties.

At this time, the Nation does not wish to actively participate in this consultation project, because:

X	This project is outside our ancestral territory
	The project's impacts are anticipated to be minimal
	The project is more closely related to _____, which should be contacted to participate in consultation



	The tribal office does not currently have the capacity to participate in this project
	Other:

However, the Nation requests to be contacted if:

- Sites associated with native history may be impacted by this project;
- Adverse effects associated with this project are identified;
- Human remains are encountered during this project;
- Unanticipated native cultural remains are encountered during this project;
- Other tribes consulting on this project cease consultation; or
- The project size or scope becomes larger or more potentially destructive than currently described.

Please do not make any assumptions about future consultation interests based on this decision, as priorities and information may change. We request that you send any future consultation communications in electronic form to [Consultation@MonacanNation.com](mailto:Consultation@MonacanNation.com). We appreciate your outreach to the Monacan Indian Nation and look forward to working with you in the future.

Kaleigh Pollak

On Mon, Dec 12, 2022 at 10:56 AM Tribal Office <[TribalOffice@monacannation.com](mailto:TribalOffice@monacannation.com)> wrote:

Thank you,

Amie Parra

**Administrative Assistant**

Monacan Indian Nation

O: (434) 363-4864

D: (434) 300-5054

111 Highview Drive

Madison Heights, VA 24572



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**From:** Weldon, Daniel T <[daniel\\_weldon@nps.gov](mailto:daniel_weldon@nps.gov)>

**Sent:** Monday, December 12, 2022 9:02 AM

**To:** Tribal Office <[TribalOffice@monacannation.com](mailto:TribalOffice@monacannation.com)>; Adrian Compton <[TribalAdmin@monacannation.com](mailto:TribalAdmin@monacannation.com)>

**Cc:** Commisso, Michael <[Michael\\_Commisso@nps.gov](mailto:Michael_Commisso@nps.gov)>

**Subject:** NPS NACE- Section 106 Consultation- Fort Dupont Stream Restoration

Chief Branham,

The National Park Service is currently preparing plans to rehabilitate the stream network of Fort Dupont Park, a large park space administered by National Capital Parks – East located in southeast Washington, D.C. The purpose of the proposed improvements is to 'uplift' the ecological health of Fort Dupont stream system, improve storm water management, and remove invasive vegetation. The NPS is writing to initiate consultation for this project. If you have any questions, please reach out to me with any questions or comments.



Thank you

Daniel

**Daniel T. Weldon, MHP**

Cultural Resources Program Manager (CRPM)

COR and ATR

National Capital Parks- East

1900 Anacostia Drive, SE

Washington, D.C. 20020

(202)6926048 office

(202)4655176 cell

[daniel\\_weldon@nps.gov](mailto:daniel_weldon@nps.gov)

pronouns: he/him

Schedule: M-F 6 am to 3 pm; Every other Friday off