SECTION 106 DOCUMENTATION

GOVERNMENT OF THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER



March 19, 2009

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

RE: Proposed Improvements to Rock Creek Trail and Rose Park Trail

Dear Ms. Coleman:

Thank you for contacting the DC State Historic Preservation Office (SHPO) regarding the above-referenced undertaking. We have reviewed the project information in accordance with Section 106 of the National Historic Preservation Act (NHPA) and are writing to provide our initial comments regarding effects on historic properties. We are also providing these comments in accordance with the National Environmental Policy Act (NEPA) to assist the National Park Service (NPS) in coordinating its review processes.

We understand that the NPS, the Federal Highway Administration, and the District of Columbia Department of Transportation are working collaboratively to develop an Environmental Assessment (EA) for the proposed improvements to Rock Creek and Rose Park Trails. These improvements include a variety of actions such as trail resurfacing and widening, road crossing modifications, new trail/bicycle route construction and erosion control measure implementation.

The NPS has requested SHPO assistance in identifying important cultural resources that should be addressed in the EA. We appreciate the early coordination and are pleased to provide general information relating to historic properties. On the other hand, the trail improvements are proposed within an area that extends approximately four-miles so we will be unable to provide specific comments until we receive additional information to define the project in much more detail.

Historic Built Environment:

Based upon our understanding of the project boundaries, it appears as if the majority of the trail improvements will be carried out directly within, or immediately adjacent to, the following historic districts: Rock Creek Park, Greystone Enclave, Piney Branch Parkway, National Zoological Park and Rock Creek and Potomac Parkway. All of these districts are all listed in the National Register of Historic Places and/or the DC Inventory of Historic Sites and many contain individually listed buildings and structures such as the Dumbarton Bridge and Peirce Mill.

Ms. Adrienne A. Coleman Proposed Improvements to Rock Creek Trail and Rose Park Trail March 19, 2009 Page 2

Depending upon the proposed alignment and nature of improvements, the undertaking could also result in direct and/or indirect effects on the following historic districts: Mount Pleasant, Woodley Park, Kalorama Triangle, Sheridan-Kalorama, Massachusetts Avenue, Oak Hill Cemetery, Montrose Park and Georgetown. These historic districts are also listed in the National Register and/or the DC Inventory and contain individually listed buildings and structures. The EA should evaluate the potential for direct and indirect effects such as visual and audible impacts within these historic districts, as appropriate.

<u>Archaeological Resources:</u>

The project area and surrounding areas are very sensitive for both prehistoric and historic archaeological resources. Within Rock Creek Park, there are areas where archaeological identification survey has not yet occurred, so additional survey may be necessary depending on the alternative selected for the project. For example, there are 52 identified archaeological sites located within Rock Creek Park, excluding the smaller parks managed by the NPS Rock Creek Park Superintendent. There are 31 identified archaeological sites within 500 meters of the boundary of Rock Creek Park, and much more of that land has not been surveyed. Consequently the potential for all types of archaeological resources is very high for any area in or near the park. In short, additional archaeological surveys may be required for any ground disturbing activities that occur outside of the existing trail alignments.

We will provide further comments regarding historic properties as soon as we have an opportunity to review additional information such as maps, plans and detailed project descriptions that define the undertaking in more detail. In the meantime, please contact me at andrew.lewis@dc.gov or 202-442-8841 if you should have any questions or comments regarding the historic built environment. Questions or comments relating to archaeology should be directed to Ruth Trocolli at ruth.trocolli@dc.gov or 202-442-8836. Thank you for providing this initial opportunity to review and comment.

Sincerely,

C. Andrew Lewis

Senior Historic Preservation Specialist DC State Historic Preservation Office

09-041

cc: Chris Holben, DDOT

Eric Feldman, Rhodeside & Harwell

GOVERNMENT OF THE DISTRICT OF COLUMBIA DEPARTMENT OF TRANSPORTATION



Planning, Policy, & Sustainability Administration

December 14, 2010

Mr. David Maloney District of Columbia Historic Preservation Office 1100 4th Street, SW Suite E650 Washington, DC 20024

RE: Rock Creek Park Multi-Use Trail: Environmental Assessment Scoping and Section 106 Consultation

Dear Mr. Maloney:

The District of Columbia Department of Transportation (DDOT), in cooperation with the National Park Service and Federal Highway Administration, is preparing an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA) to assess the potential effects of various alternatives to rehabilitate the existing Rock Creek Park Multi-Use Trail in Washington, DC (attached). The project will consider the effects to historic properties in accordance with the requirements of Section 106 of the National Historic Preservation Act (16 U.S.C. §470) and its implementing regulations, 36 CFR Part 800. The purpose of this letter is to formally invite the District of Columbia Historic Preservation Office to be a part of the scoping process for this project and to initiate Section 106 consultation for this project.

The proposed project area parallels Rock Creek through the following Historic Districts located on the National Register of Historic Places: Rock Creek Park, Rock Creek and Potomac Parkway, and the National Zoological Park. These Historic Districts are located in the northwest portion of Washington, DC, and, together, extend from the Maryland state line south to Virginia Avenue, NW. The proposed action includes the rehabilitation of a 3.7-mile segment of the existing Rock Creek Trail and a 3,000-foot segment of the existing Rose Park Trail; construction of a new trail along Piney Branch Parkway from Beach Drive to Arkansas Avenue at Taylor Street; and the construction of a new trail and/or bicycle route adjacent to the exit/entrance ramp connecting P Street to the Rock Creek Parkway. Main elements of the project include:

- Resurfacing and trail widening of the existing facility at environmentally feasible and historically appropriate locations;
- Modifications to the trail alignment and roadway crossings to improve user safety;
- Erosion control; and
- Connections to and from the trail.

Elements of this EA will include documentation of the purpose and need; identification of sensitive environmental resources; development of context sensitive alternatives; evaluation of impacts to cultural,

natural, and socio-economic resources; agency and stakeholder coordination; effects to historic and archeological resources; and public involvement.

Please forward your comments on the proposed Rock Creek Park Multi-Use Trail EA to Ms. Austina Casey at:

Austina Casey Environmental Policy Analyst Planning, Policy, & Sustainability Administration District Department of Transportation 2000 14th Street, NW, 7th Floor Washington, DC 20009

Austina.casey@dc.gov

Sincerely,

Faisal Hameed

Chief, Project Development, Environment & Sustainability 202-671-2326

Enclosures

cc: Nick Bartolomeo, Rock Creek Park

Cynthia Cox, Rock Creek Park

Steve Callcott, DC HPO Austina Casey, DDOT

Joel Gorder, NPS National Capital Region Michael Hicks, FHWA – DC Division

Carol Legard, ACHP Andrew Lewis, DC HPO

GOVERNMENT OF THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER



January 18, 2011

Ms. Austina Casey, Environmental Policy Analyst Planning, Policy, & Sustainability Division District Department of Transportation 2000 14th Street, NW, 7th Floor Washington, DC 20009

RE: Initiation of Section 106 Review; Rehabilitation of the Rock Creek Park Multi-Use Trail

Dear Ms. Casey:

Thank you for contacting the DC State Historic Preservation Office (SHPO) regarding the above-referenced undertaking. We understand that the Federal Highway Administration (FWHA), the District Department of Transportation (DDOT) and the National Park Service (NPS) will be cooperating to rehabilitate the Rock Creek Park Multi-Use Trail by resurfacing, widening and realigning select portions of the trail and by improving erosion control measures and connections to and from the trail. As indicated in your submittal, the proposed undertaking will be carried out within, or adjacent to the Rock Creek Park, Rock Creek and Potomac Parkway, and National Zoological Park Historic Districts. All three of these historic districts are listed in the National Register of Historic Places.

We look forward to reviewing the Environmental Assessment that is being prepared for the project and to assisting you in fulfilling the requirements of Section 106 of the National Historic Preservation Act for the undertaking. To that end, we would appreciate receiving a draft Area of Potential Effect (APE), initial list of consulting parties, and an outline of what is already known about historic properties that may be affected by the rehabilitation project. Additional information about the scope of work will also be necessary to finalize the APE, consulting parties list, and to identify potentially effected historic properties. The latter category is likely to require some effort to define since we suspect that many small trail elements such as retaining walls, bridges, and culverts may be affected by the project.

With regard to archaeology, Dr. Ruth Trocolli will provide your archaeological consultant with the identified archaeological resources that are likely to fall within the APE. Numerous archaeological sites have been identified in and near the project area, and much of the corridor has high potential for both prehistoric and historic sites. When the preferred alternative is selected, great care must be taken to avoid known sites and to test proposed locations that will be subject to ground-disturbing activities that have not been previously surveyed for archaeological sites. Coordination with both the NPS Regional Archeologist Dr. Stephen Potter, and Dr. Trocolli will be needed.

If you should have any questions or comments regarding the historic built environment, please contact me at <u>andrew.lewis@dc.gov</u> or 202-442-8841. Questions regarding archaeology should be directed to Ruth Trocolli at <u>ruth.trocolli@dc.gov</u> or 202-442-8836. Otherwise, we look forward to receiving additional information as soon as it becomes available.

Sincerely,

C. Andrew Lewis

Senior Historic Preservation Specialist

DC State Historic Preservation Office

10-518

GOVERNMENT OF THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER



March 24, 2011

Ms. Austina Casey Environmental Policy Analyst Planning, Policy, & Sustainability Division District Department of Transportation 2000 14th Street, NW, 7th Floor Washington, DC 20009

RE: Additional Section 106 Comments Regarding the Rehabilitation of the Rock Creek Park Multi-Use Trail

Dear Ms. Casey:

The DC State Historic Preservation Office (SHPO) received the invitation to be a part of the scoping process for the above-referenced undertaking shortly after we forwarded our January 18, 2011 letter to you regarding the initiation of the Section 106 process.

In response to the scoping request, we examined our files and located a March 19, 2009 letter about the project that we had written to the National Park Service (NPS), one of the co-lead agencies for the undertaking. We are forwarding that letter to you for your information.

In addition, our files contain a survey of a variety of culverts and other small located within Rock Creek Park. These survey forms, which were provided to us by the NPS, include photographs, written descriptions and brief historical information related to the resources. Depending upon the location and type of the proposed rehabilitation work, these survey forms may prove very helpful in identifying historic properties that may be affected by the undertaking. We will be pleased to make this information available if it will be useful.

If you should have any questions or comments regarding the historic built environment, please contact me at andrew.lewis@dc.gov or 202-442-8841. Questions regarding archaeology should be directed to Ruth Trocolli at ruth.trocolli@dc.gov or 202-442-8836. Otherwise, we look forward to working with all parties to complete the Section 106 review of this undertaking.

Sincerely,

C. Andrew Lewis

Senior Historic Preservation Specialist DC State Historic Preservation Office

10-518

GOVERNMENT OF THE DISTRICT OF COLUMBIA DEPARTMENT OF TRANSPORTATION



Planning, Policy, & Sustainability Administration

July 5, 2011

Mr. Andrew Lewis Senior Historic Preservation Specialist DC Historic Preservation Office 1100 4th Street SW Suite E650 Washington, DC 20024

RE: Rock Creek Park Multi-Use Trail Rehabilitation
Area of Potential Effects

Dear Mr. Lewis:

The District Department of Transportation (DDOT), in cooperation with the Federal Highway Administration (FHWA) and National Park Service (NPS), is preparing an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA) to assess the potential effects of various alternatives to rehabilitate the existing Rock Creek Park Multi-Use Trail in Washington, DC. The project will consider the effects to historic properties in accordance with the requirements of Section 106 of the National Historic Preservation Act (16 U.S.C. §470) and its implementing regulations, 36 CFR Part 800.

This letter describes and documents the proposed Area of Potential Effect (APE) for the proposed Rock Creek Park Multi-Use Trail Rehabilitation as revised and expanded based on your comments on May 13, 2011. The project area includes a 3.7-mile segment of the Rock Creek Park multi-use trail from Broad Branch Road to P Street, NW; a 4,300-foot (0.8 mile) segment of the Piney Branch Parkway trail from Beach Drive to Arkansas Avenue, NW; a 1,250-foot segment of social trail from Blagden Avenue to the Peirce Mill parking lot (referred to as the Peirce Mill Trail Spur); and a 2,600-foot (0.5 mile) segment of the Rose Park trail from P Street, NW to M Street, NW. The proposed action includes resurfacing, trail widening where environmentally feasible, modifications to the trail alignments and road crossing, and connections to and from the trails to other pedestrian and bicycle facilities. The majority of the proposed improvements are located on NPS land within Rock Creek Park, with some improvements located within District of Columbia right-of-way. A segment of the trail also passes through National Zoological Park property. A map showing the location of the proposed improvements is presented in Figure 1.

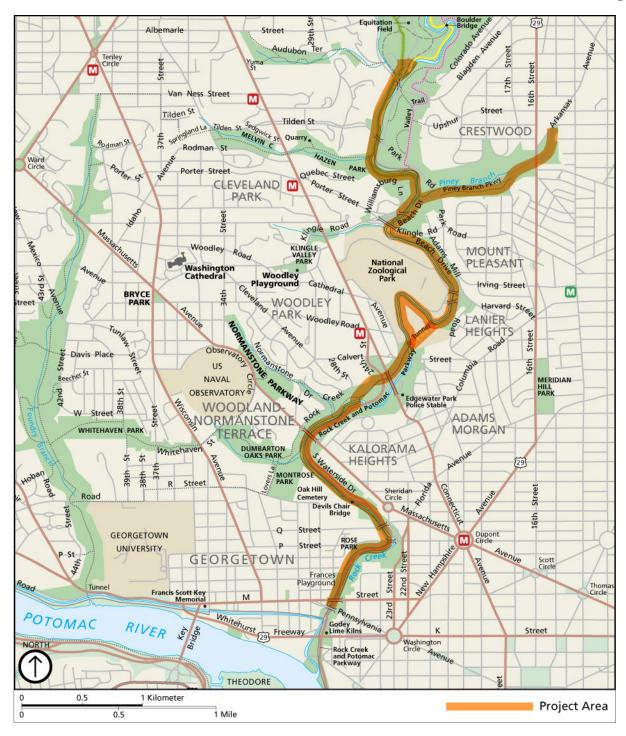


Figure 1. Rock Creek Park Multi--Use Trail Rehabilitation Project Area

PROPOSED IMPROVEMENTS

The EA will analyze a No Action Alternative (Alternative 1) along with two Action Alternatives (Alternative 2 and Alternative 3) for the Rock Creek Park Multi-Use Trail Rehabilitation. Under the Alternative 1, NPS would continue its current trail maintenance activities and no new construction would occur. Under Alternative 2, the Rock Creek Park multi-use trail would be resurfaced along its current alignment and at its current width, which varies throughout the trail. Under Alternative 3, the Rock Creek Park multi-use trail would be resurfaced along its current alignment and widened to a minimum of 6 feet and a maximum of 10 feet, depending on physical and environmental constraints. The project also includes spot improvements along the trail to enhance safety and visitor experience, as well as new connections to Rock Creek Park from the existing pedestrian and bicycle networks in the neighborhoods surrounding the park.

In addition to the Action Alternatives, two Options for the visitor-made "social" trail from Blagden Avenue to Peirce Mill (Peirce Mill Spur), and three Options for the Rose Park trail will be analyzed. Under Peirce Mill Trail Spur Option A, the trail would remain unchanged. Under Option B, the current social trail would be resurfaced to an 8-foot width.

Under Rose Park Trail Option A, NPS would continue its current maintenance practices and no new construction would occur. Under Option B, the Rose Park trail would be resurfaced at its current location to a standard 6-foot width. Under Option C, the Rose Park trail would be resurfaced at its current location to a standard 8-foot width.

Overview maps of the Alternatives and options are included as Attachment A.

AREA OF POTENTIAL EFFECT

According to the Section 106 Regulations (36 CFR 800), an APE is defined as "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking." The determination of an APE is an initial step in the Section 106 process that facilitates the identification of historic properties and an assessment of the potential impacts of the proposed undertaking on those properties.

In compliance with the Advisory Council on Historic Preservation's regulation implementing Section 106, a proposed APE for historic properties was determined to be a 200-foot band flanking the trail, expanded as appropriate to capture key adjacent historic properties. Due to the dense vegetation and topography of the project area, as well as the minimal visual qualities of the proposed improvements, impacts to historic views and vistas will be limited. For the purposes of evaluation, the proposed APE for historic resources includes the area from which the project site is readily visible, as well as resources that could be impacted due to changes in the character of the area.

The APE for archaeological resources comprises the Limit of Disturbance (LOD) as identified by project planners for the various proposed construction-related activities that will result in ground disturbance.

Detailed maps outlining the proposed APE for historic structures and archaeological sites are enclosed with this letter (Attachment B).

IDENTIFICATION OF HISTORIC RESOURCES

DDOT consultants, Greenhorne & O'Mara, Inc. and Robinson & Associates, Inc., developed the proposed APE through site visits, fieldwork, historic map research, discussions with consulting parties (Attachment C), and examinations of existing studies. Existing studies consulted include the National Register of Historic Places documentation, Historic American Buildings Survey and Historic American Engineering Record (HABS/HAER) documentation, Historic Resources studies, Cultural Landscape inventories, and the D.C. Inventory of Historic Sites.

The proposed APE for historic resources and archaeological sites traverses both the Rock Creek Park, the Rock Creek and Potomac Parkway, and Georgetown historic districts, listed in the National Register of Historic Places (NRHP). The proposed APE also includes 14 individually landmarked properties or individual properties determined potentially eligible for landmark designation, and 33 resources identified as contributing elements of designated historic districts within the APE. These historic resources are identified below.

Historic Districts

Rock Creek Park Historic District

The Rock Creek Park Historic District, defined as US Reservation 339, was established by Congress in September 1890 for the scenic and recreational enjoyment of the people of the United States. The park boundaries are roughly defined as 16th Street NW on the east, Oregon Avenue and Branch Road NW on the west, Klingle Road NW to the south, and the District line and Parkside Drive NW on the north. Rock Creek Park was listed as a historic district in the NRHP in 1991, and comprises approximately 1,754 acres of predominantly forested valley with sloping hills and meadows. The park meets National Register Criteria A, B, and C as possessing areas of significance for architecture, community planning and development, conservation, entertainment and recreation, industry, landscape architecture, military and horticulture. Significant persons associated with the history of the park include Joshua Peirce and landscape architects Frederick Law Olmsted, Jr., and John C. Olmsted. According to the NRHP nomination, the park exhibits a high degree of integrity of design, workmanship, location, feeling, association, and setting, which continues to reflect its development as a public landscape between 1831 and 1941. *D.C. Inventory of Historic Sites, 8 November 1964, National Register of Historic Places 23 October 1991*

Contributing Elements of the Rock Creek Park Historic District within the APE:

Sites/Designed Landscape:

1. Peirce-Klingle Mansion Landscape

Buildings:

- 1. Peirce Barn
- 2. Peirce Mill

Structures:

- 1. Beach Drive
- 2. Bluffs Bridge
- 3. Culverts

- 4. Jules J. Jusserand Memorial
- 5. Peirce Mill Bridge
- 6. Peirce Mill (Park) Road
- 7. Piney Branch Parkway
- 8. Retaining Walls
- 9. 16th Street Bridge
- 10. Trail network

Rock Creek and Potomac Parkway Historic District

Rock Creek and Potomac Parkway, US Reservation 360, occupies the gorge and rim of the lower Rock Creek Valley and a stretch of land along the Potomac River waterfront. The district comprises approximately 173 acres in the northwest quadrant of Washington, D.C. Plans for the parkway were initiated as early as 1867, but did not gain momentum until the Senate Park Commission included the reservation in its 1901 plans for the National Mall and surrounding environs. In 1913, the parkway was officially authorized to provide a landscaped connection between the Mall and Potomac Park (later renamed East and West Potomac Parks) and the already established Rock Creek Park and National Zoo. The parkway comprises a major component of the District's comprehensive park system developed following City Beautiful ideals during the early twentieth century. Originally built for horse-drawn carriages, horseback riders, pedestrians, and the occasional automobile, the Rock Creek and Potomac Parkway was one of the earliest parkways in the nation and the first federally funded road. The parkway experienced numerous design changes to facilitate growing automobile use during the early 1900s; however, brindle paths continued to be an integral part of the original trail network design and equestrians used the park through the 1950s. The Rock Creek and Potomac Parkway is listed in the NRHP by the NPS as a historic district under the multiple property listing "Parkways of the National Capital Region, 1913-1965." The parkway is significant under Criteria A and C in the areas of community planning and development, landscape architecture, architecture, and recreation during the period 1791 to 1951. D.C. Inventory of Historic Sites, 8 November 1964; National Register of Historic Places 4 May 2005

Most of the lower Rock Creek Valley (the area south of the National Zoo) remained in its natural state throughout the eighteenth century and the first half of the nineteenth century. Starting in 1831, a system of trails and roads began to develop throughout the area that became the park, and continued to evolve through the twentieth century. The circulation network, comprising the historic roads and trails, is a contributing resource to both the Rock Creek Park Historic District and the Rock Creek and Potomac Parkway Historic District. Although the NRHP documentation cites the trail network as significant, it does not specifically determine which trails are contributing resources.

The NPS National Capital Region is currently developing a cultural landscape report for the historic trails in the park. This documentation and planning effort will be completed in FY 2012. As part of the Section 106 undertaking related to the Rock Creek Park Multi-Use Trail Rehabilitation Project, a preliminary evaluation of the historic alignments of the trails within the project area was conducted by Robinson & Associates, Inc. Using the park's archival resources and historic mapping, as well as evaluating other key maps at local archival repositories, a

composite map was created to illustrate the evolution of the historic alignments throughout the project area and to better define the historic resource (Figure 2).

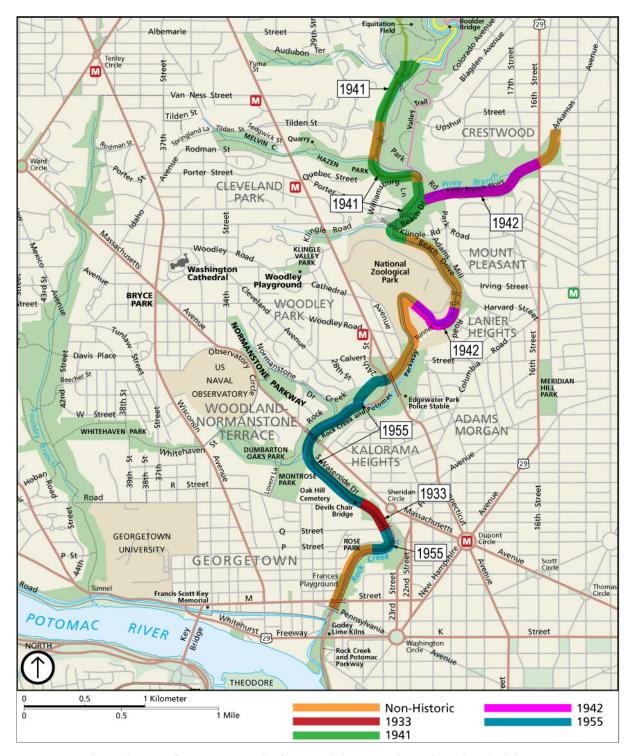


Figure 2. Rock Creek Park Trail: Current Alignments following Historic Alignments

<u>Contributing Elements of the Rock Creek and Potomac Parkway Historic District within the APE:</u>

Sites/Designed Landscape:

- 1. Median
- 2. Parkway Ending / Road Trace
- 3. Rock Creek
- 4. Shoreham Hill
- 5. Woodley Lane Bridge Abutments

Buildings:

1. Washington City Tunnel Storage Shed

Structures:

- 1. Connecticut Avenue Bridge (William H. Taft Memorial Bridge)
- 2. Culverts
- 3. Duke Ellington Bridge (Calvert Street Bridge)
- 4. Dumbarton Bridge (Buffalo Bridge)
- 5. Lyons Mill Footbridge (Devil's Chair Footbridge)
- 6. M Street Bridge
- 7. Massachusetts Avenue Bridge (Charles C. Glover Memorial Bridge)
- 8. P Street Bridge
- 9. P Street Road Bridge Rock Creek and Potomac Parkway
- 10. Saddle Club Footbridge (Shoreham Hill Footbridge)
- 11. South Waterside Drive Overpass
- 12. Shoreham Hill Road Bridge
- 13. Trail Network

Georgetown Historic District

Georgetown was founded by an Act of the Maryland Assembly in 1751, and incorporated with an elected government in 1789. It became part of the District of Columbia upon the District's establishment in 1791, remaining a separate jurisdictional entity within the city until Congress revoked its independent charter in 1871. Congress abolished Georgetown as a legal entity in 1895. The Georgetown district is a remarkably intact example of a complete historic town with a rich variety of residential, commercial, institutional, and industrial buildings spanning several centuries. The building inventory includes a wide range of houses from simple frame dwellings to spaciously landscaped mansions. Architectural styles are also varied and include Federal, Greek Revival, Italianate, Queen Anne, Romanesque, and Classical Revival examples, as well as numerous vernacular structures. Georgetown includes many of city's oldest buildings and its narrow grid streets establish intimate scale, in contrast to L'Enfant's Plan of the City of Washington. *D.C. Inventory of Historic Places*, 8 November 1964; National Historic Landmark

and National Register of Historic Places, 28 May 1967; period of significance expanded 27 February 27 2003

Contributing Elements of the Georgetown Historic District within the APE:

Sites/Designed Landscape:

1. Rose Park¹

Historic Sites

Greystone Enclave

This property is comprised of four dwellings and their associated outbuildings, as well as the setting in which they are located. Greystone Enclave includes Linnaean Hill, built 1823; Greystone, built 1913 and designed by architect Waddy B. Wood; Gearing Bungalow, built 1914 and designed by architect Nicholas R. Grimm; and Pine Crest Manor, built 1929 and designed by architect Gordon B. MacNeil. 2323, 2325, and 2329 Porter Street, NW; 3445 Williamsburg Lane, N.W.; D.C. Inventory of Historic Sites, 21 June 1989

Montrose Park

This 16-acre public park, established in 1911, is located in the northern section of Georgetown, adjacent to Dumbarton Oaks, Dumbarton Oaks Park, and the Oak Hill Cemetery. The historic character of Montrose Park is largely the work of two skilled landscape architects for the D.C. Office of Public Buildings and Grounds, George E. Burnap and Horace W. Peaslee. The park is also important as an early-twentieth century example of the adaption of a country estate as a community park. *R Street between 30th and 31st streets, N.W.; D.C Inventory of Historic Sites, 3 March 1979; National Register of Historic Places, 28 May 1967*

Mount Zion Cemetery

Established in 1809, the cemetery comprises the Old Methodist Burying Ground and the Female Union Band Society Graveyard. In 1842, the cemetery was established as a benevolent association to provide burial for free blacks. The property connotes the association between black Americans and the development of Georgetown. *Mill Road, N.W.; D.C. Inventory of Historic Sites, 19 April 1975; National Register of Historic Places, 6 August 1975*

National Zoological Park

Established in 1889 and expanded in 1921 and 1923, the National Zoo is a major achievement of the late nineteenth-century conservation movement, created for the preservation of endangered animals indigenous to the US. The property is a major component of the park system in the Rock Creek valley and is also significant as an important work of noted landscape architect Frederick Law Olmsted, with alterations by F.L. Olmsted, Jr. Major scientific investigations including experiments in zoology, anatomy, and aerodynamics were conducted on the site. The zoo's spacious and picturesque location was a significant innovation in zoo design that also influenced the layout of the curvilinear street pattern in the surrounding area. 3000 Connecticut Avenue, N.W.; D.C. Inventory of Historic Sites, 8 November 1964; National Register of Historic Places, 11 April 1973

¹ Although the Georgetown Historic District nomination does not include an inventory of contributing resources, the State Historic Preservation office considers Rose Park to be one.

Oak Hill Cemetery

Established in 1848 as a garden park cemetery by W.W. Corcoran, a banker and founder of what is now Riggs National Bank. Oak Hill is an example of the nineteenth century Romantic Movement. The cemetery is bounded by Rock Creek Park on the north and east. 30th and R streets N.W.; D.C. Inventory of Historic Sites, 8 November 1964

Historic Buildings

Jackson Hill (Holt House)

Holt House is located on the grounds of the National Zoological Park grounds, to the east of the main zoo. Constructed by 1827, the dwelling is one of the few remaining examples of a five-part Georgian plan in the District. Alterations were made to the house by Glenn Brown, W.R. Emerson, and Hornblower and Marshall from 1890-1901, when the building became the administrative offices for the zoo. *Adams Mill Road; D.C. Inventory of Historic Sites*, 8 *November 1964; National Register of Historic Places*, 24 *April 1973*

Oak Hill Cemetery Chapel

The chapel was designed by James Renwick in 1850 and sits on the highest ridge of the cemetery. The chapel is the only known example of Renwick's Gothic Revival church design in the District. 30th and R streets N.W.; D.C. Inventory of Historic Sites, 8 November 1964, National Register of Historic Places, 16 March 1972

Peirce Barn

Built by Isaac Peirce circa 1810, the building is a two-and-one-half story vernacular stone barn with a rectangular ground plan. The barn was restored in 1935-1936, and in 1971 was modernized for use as an art barn/gallery. 2400 block Tilden Street, N.W.; National Register of Historic Places, 25 October 1973

Peirce-Klingle House (Linnaean Hill)

This property comprises the Peirce-Klingle House, Peirce-Klingle Utility House and Potting Shed, Peirce-Klingle Stable/Garage. The dwelling is a three-story, ten-room farmhouse constructed of blue and grey granite in 1823 by Joshua Peirce, a nurseryman who supplied the first ornamental plantings for the White House, the Capitol and other government buildings. In its time, Linnaean Hill was a gathering place for Washington society. 3545 Williamsburg Lane N.W.; D.C. Inventory of Historic Sites, 8 November 1964; National Register of Historic Places, 10 October 1973

Peirce Mill

The mill was built by Isaac Peirce in either 1820 or 1829 and is the last known extant grist mill in the District. Peirce Mill is the principle relic of the Peirce plantation and a unique symbol of the milling industry that once flourished along Rock Creek. *Tilden Street and Beach Drive N.W.;* D.C. Inventory of Historic Sites, 8 November 1964; National Register of Historic Places, 24 March 1969

Historic Structures

Connecticut Avenue Bridge (William H. Taft Memorial Bridge)

The bridge, designed by George S. Morison, was built between 1897 and 1906. When it was completed, it was the largest bridge in the world. It is also significant for its method of construction, consisting of unreinforced concrete poured inside a frame of precast concrete panels. In 1931 it was renamed after the former president and Supreme Court chief justice William Howard Taft. *Connecticut Avenue*, N.W.; D.C. Inventory of Historic Sites, 8 November 1964; National Register of Historic Places, 3 July 2003

Duke Ellington Bridge (Calvert Street Bridge)

Designed by Paul Cret, the bridge was constructed between 1933 and 1935. The Calvert Street Bridge replaced an 1891 iron trestle bridge and was designed to accommodate streetcars. *Calvert Street N.W.; D.C. Inventory of Historic Sites, 8 November 1964*

Dumbarton Bridge (Buffalo Bridge)

The bridge, designed by father and son architectural team of Glenn and Bedford Brown and inspired by Roman aqueducts, was erected between 1912-1915, before the parkway legislation was enacted. The creek, the road, and the trail pass through separate arches. The four corners of the bridge are marked by monumental bronze bison designed by sculptor Alexander Phimister Proctor, giving the bridge its name. *Q Street, N.W.*; *D.C. Inventory of Historic Sites*, 8 November 1964; National Register of Historic Places, 16 July 1973

Van Ness Mausoleum

Designed by George Hadfield and constructed from 1823-24, the mausoleum stands on a high knoll in the Oak Hill Cemetery. Hadfield's design for the circular temple combined classical Greek and Roman elements. The mausoleum was moved from H Street, N.W. to its present location in 1872-73. *D.C. Inventory of Historic Sites, 8 November 1964; National Register of Historic Places, 17 December 1982*

IDENTIFICATION OF ARCHAEOLOGICAL SITES

The most comprehensive archaeological project conducted within the APE, among numerous other smaller projects, was performed in portions of Rock Creek Park by The Louis Berger Group, Inc. between 2002 and 2006 (Fiedel et al. 2008). The archaeological survey was conducted using varying field methods, including pedestrian walkover and shovel test pit excavations, and varying intensities, including 10 m, 20 m, and judgmental intervals. The survey identified 51 new sites and 11 previously identified sites. These sites include precontact Native American quarries and camps and Historic period mills, tenancies, farmsteads, and Civil Warrelated sites. Portions of the proposed Rock Creek Park Multi-Use Trail archaeological APE were surveyed for archaeological resources by The Louis Berger Group, Inc. (Fiedel et al. 2008), as well as by other projects (such as Inashima 1985; Michaud et al. 2002; Fehr 1981, among others). The archaeological survey resulted in the location of four archaeological sites within the Rock Creek Park Multi-Use Trail archaeological APE. However, additional unrecorded sites are likely present within areas not investigated by The Louis Berger Group, Inc. The four recorded archaeological sites are discussed below.

51NW001

Site 51NW001, or the Piney Branch Quarry site, located within the Piney Branch segment of the Rock Creek Multi-use Trail, has a long history of archeological investigation. This site was initially investigated by William Henry Holmes of the Smithsonian Institution during 1889 and 1890. Holmes excavated a number of trenches that distinguished discrete episodes of artifact deposition in a stratified sequence, described by Fiedel et al. (2008:50) as consisting of "great piles of quartzite cobbles and chipping debris." Fieldel et al. (2008) examined the Holmes collections and suggest that a wide range of quarrying and tool making activities were conducted at this site. Temporally diagnostic stone tools suggest that much of the material dates to the Late Archaic period. In the mid-1980s, Inashima (1985:287) recommended that any constructionrelated activities associated with an NPS erosion control and bank stabilization project be monitored due to the proximity of the Piney Branch Quarry site (51NW001), located south of Piney Branch. Finally, this site has been investigated as part of the Berger Section 110 Rock Creek Park survey sponsored by the NPS (Fiedel et al. 2008). Fiedel et al. (2008) report on efforts to locate and reevaluate the integrity of the Piney Branch Quarry site. Investigation techniques employed during the Berger investigations consisted of a pedestrian reconnaissance walkover along trails and at the Piney Branch Quarry archaeological site (51NW001) and the excavation of shovel test pits in selected areas in and near 51NW001. Fiedel et al. (2008:49) characterize 51NW001 as the most important archaeological site in Rock Creek Park. A walkover reconnaissance of the site by Berger field crews indicates that the site remains much as it had been at the conclusion of the Holmes excavations, although the construction of an apartment building has apparently destroyed a few small quarry areas. This site has been listed in the NRHP.

51NW008

Also known as the Bladgen Mill Site, this location is a nineteenth century bone and flour mill that was investigated during a 1981 New York University archaeological field school. The investigations were reported in a September 18, 1981 two-page letter from Bert Salwen and Susan Mayer to the NPS. Test excavations located a structural wall and floor associated with the bone mill and a trace of a raceway that was shared by the bone and flour mills. Aside from bone, nineteenth and twentieth century glass and ceramics were recovered. This site has not been evaluated for listing in the NRHP.

51NW154

This site consists of the area surrounding the extant Peirce Mill structure located along Tilden Street. The cornerstone of the standing mill indicates construction in 1829, although the Samuel Beall's Mill, perhaps dating as early as 1760, may also have stood at this location. Artifacts dating from the eighteenth through the twentieth centuries were found during the site survey. However, the archaeological field investigation suggests that much of the area surrounding the extant mill structure has been disturbed (Fiedel et al. 2008:183-186). While the site is unevaluated for listing in the NRHP, Fiedel et al. (2008:224) indicate that the entire complex is "almost certainly" eligible. As noted earlier in this letter, the Pierce Mill has been listed in the NRHP on 24 March 1969. More recently, The Louis Berger Group, Inc. completed additional investigations within the Peirce Mill site in advance of proposed parking lot and bus turnaround improvements (Bedell and Shellenhamer 2010). No intact archaeological deposist were found

within the area of impact. However, the report recommends that areas of subsurface impacts within the Peirce Mill site area be investigated.

51NW216

Site 51NW216 is located within the Walter B. Peirce Community Park and is the location of the former Colored Union Benevolent Association Cemetery and an adjacent Quaker Cemetery. The cemetery was in use between ca. 1870 and 1890 and research indicates that over 7,500 individuals were buried at this location, of which less than 200 have been disinterred and relocated. The cemetery was located when graves eroded into the adjacent Rock Creek. Currently, research on this cemetery is being undertaken by Howard University and members of the Kalorama Citizens Association. The cemetery is located in the south portion of the park to the east of Rock Creek.

NEXT STEPS

The APE for the Rock Creek Park Multi-Use Trail Rehabilitation project has been revised and expanded to include adjacent historic resources as appropriate. DDOT will use the map and the identification of historic properties to inform the forthcoming evaluation of the potential effects of the Rock Creek Park Multi-Use Trail undertaking on historic and cultural resources.

If you agree with the determination of the Area of Potential Effects as presented in this revised document and maps, please sign the concurrence line below and return a copy of this letter to my address given below. Please do not hesitate to contact me with any questions you may have regarding the proposed APE and the identification of historic properties for the Rock Creek Park Multi-Use Trail Rehabilitation project.

Sincerely,

Austina Casey

Environmental Policy Analyst

Auture Carry

Planning, Policy, & Sustainability Administration

District Department of Transportation

55 M Street, SE, Suite 500

Washington, DC 20003

Enclosures: Alternatives Mapping

Map of Area of Potential Effect

Consulting Parties

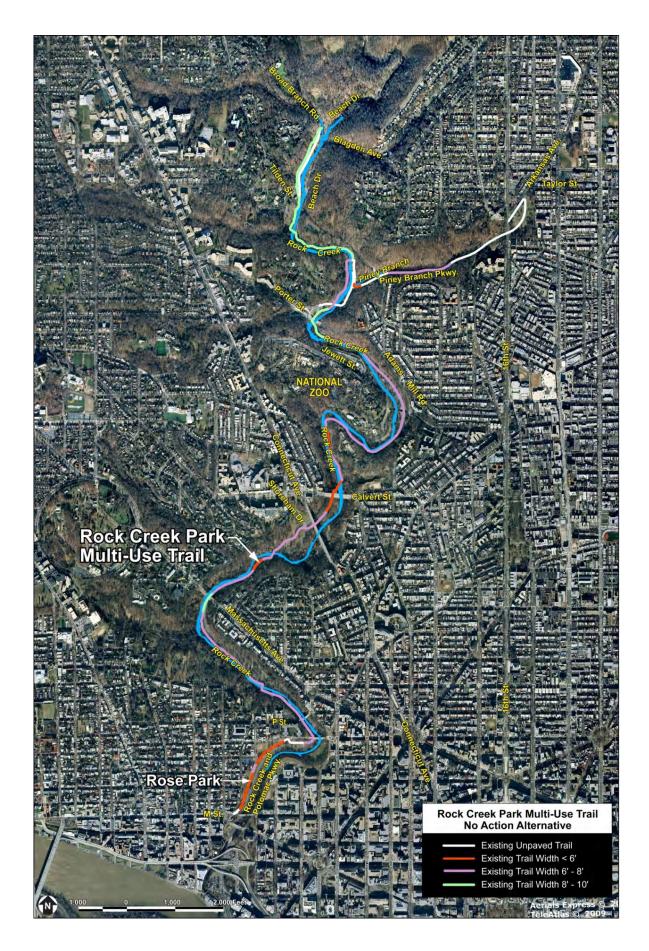
I concur with the Area of Potential Effect as presented for the Rock Creek Park Multi-Use Trail Rehabilitation project:

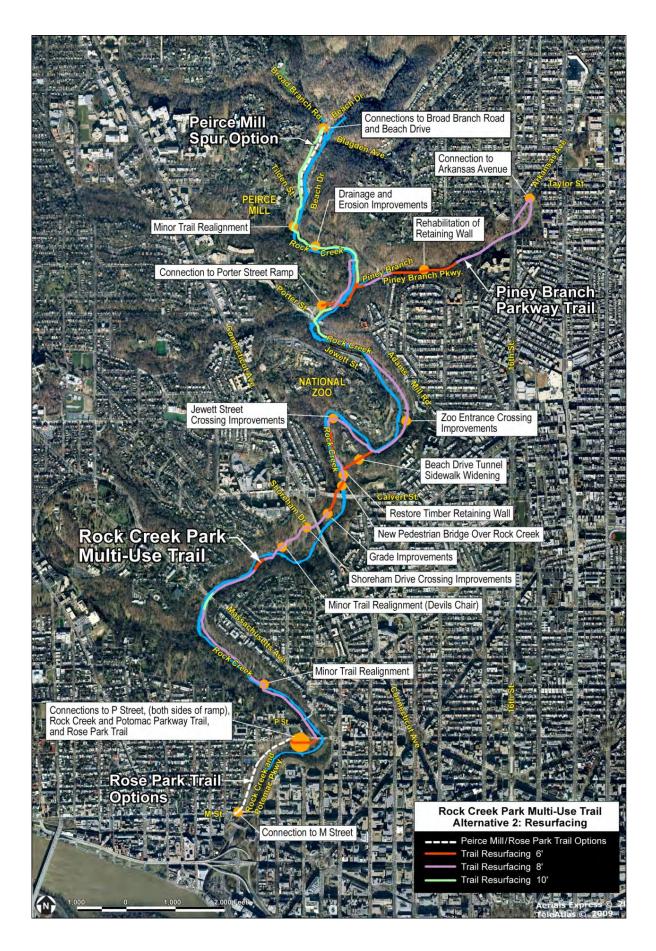
Andrew Lewis
Senior Historic Preservation Specialist
DC Historic Preservation Office

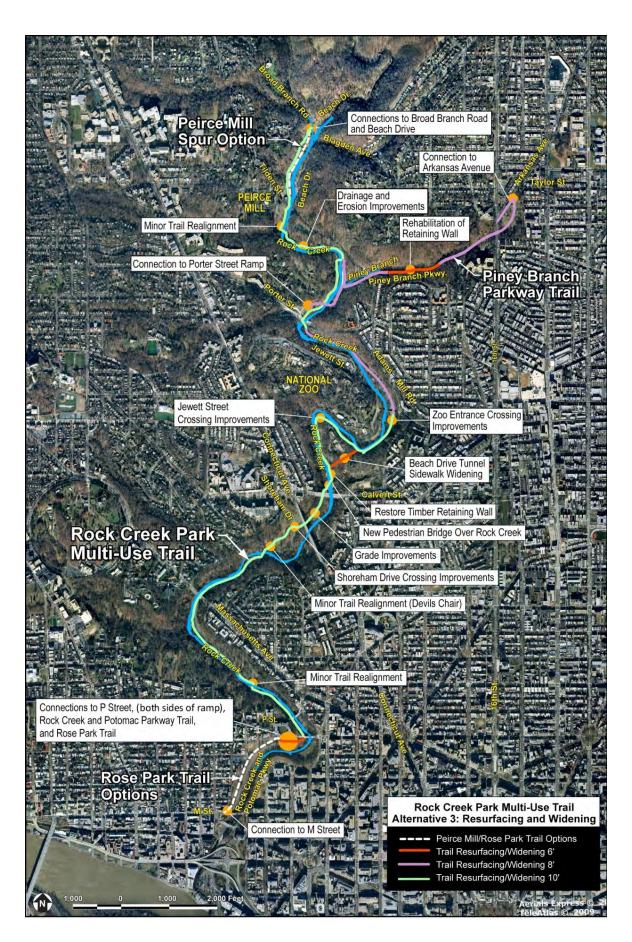
cc: Ruth Trocolli, DC HPO

Nick Bartolomeo, Rock Creek Park Cynthia Cox, Rock Creek Park Joel Gorder, NPS National Capital Region Michael Hicks, FHWA – DC Division

Attachment A Alternatives Mapping





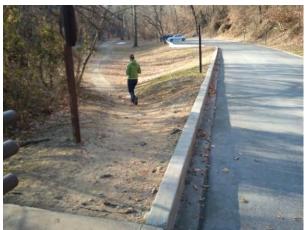




Peirce Mill Trail Spur Options

Option A: No Action

Option B: 8-Foot Paved Trail Spur





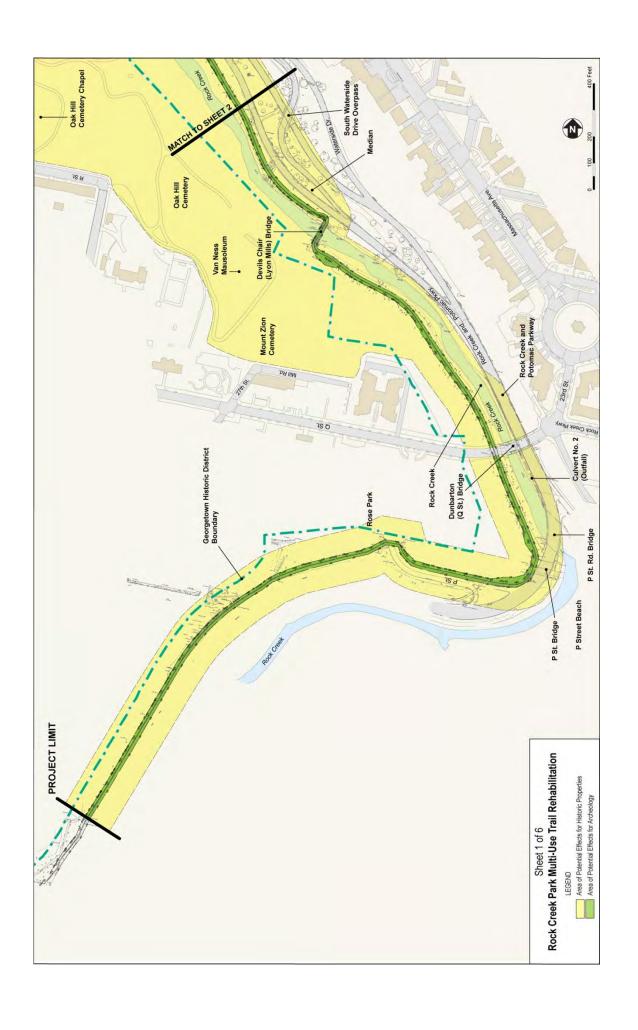
Rose Park Trail Options

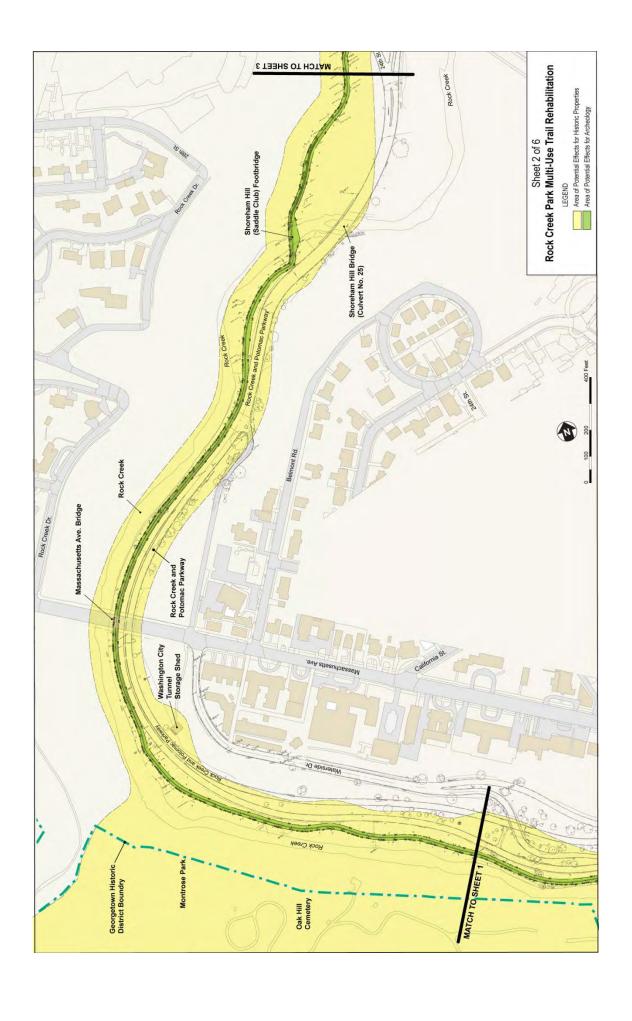
Option A: No Action

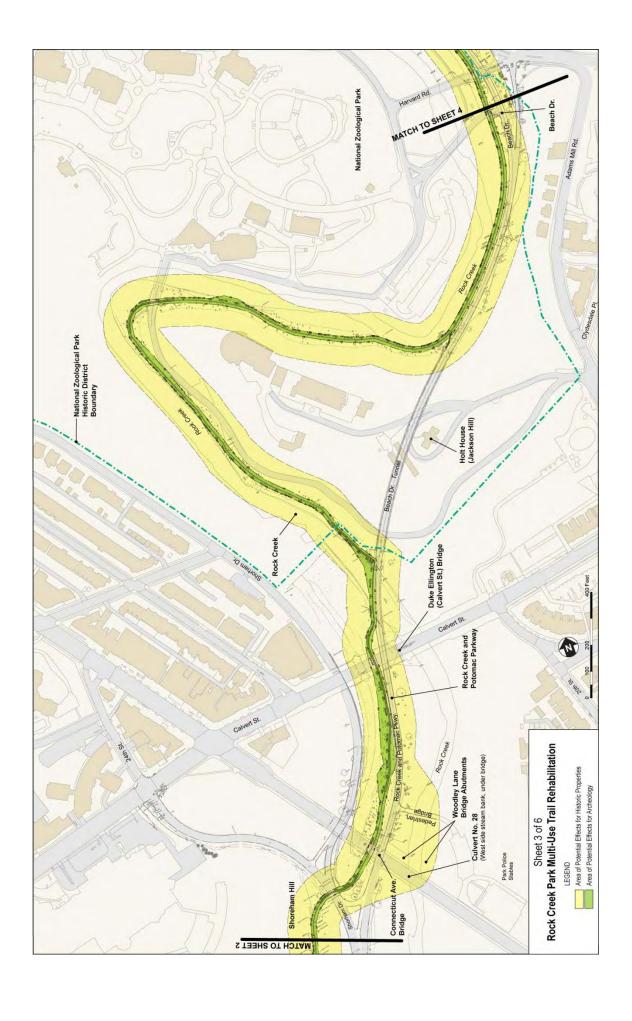
Option B: 6-Foot Resurfaced Trail

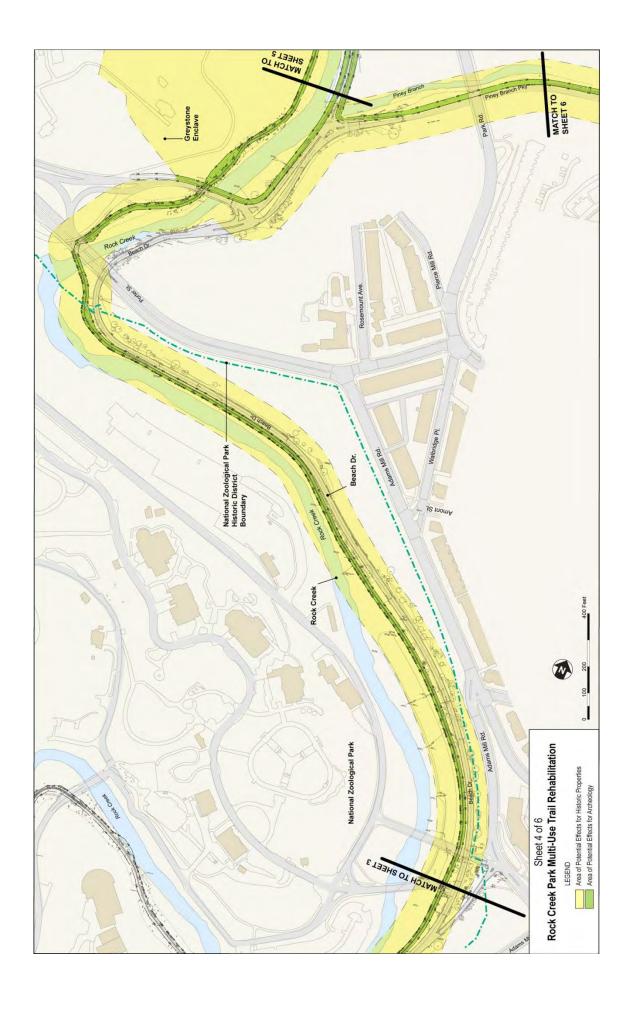
Option C: 8-Foot Resurfaced Trail

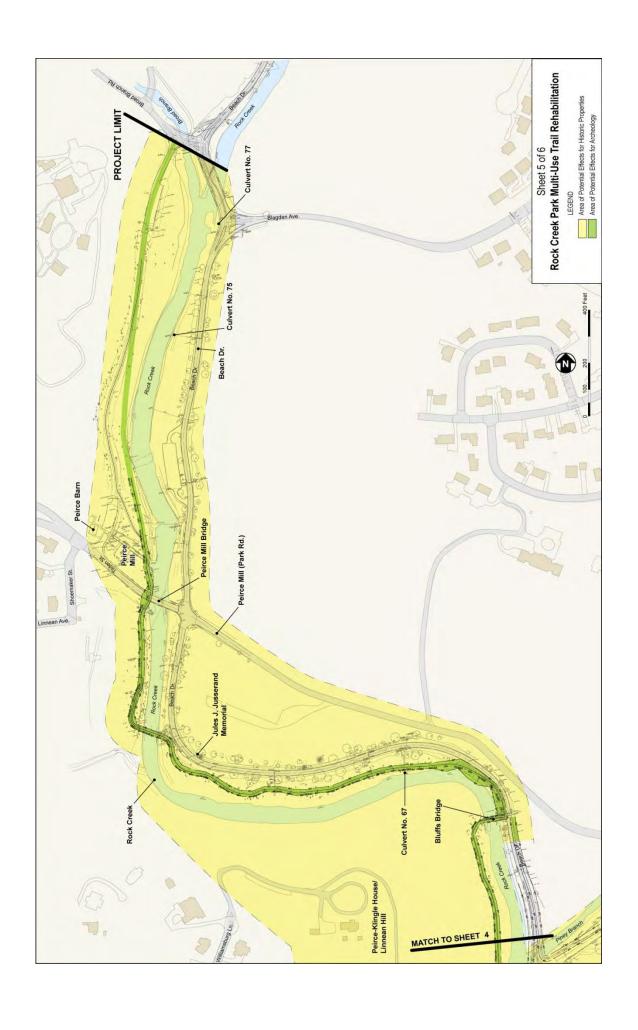
Attachment B Proposed Area of Potential Effect













Attachment C Consulting Parties

Federal/Regional Agencies

Mr. Joseph C. Lawson Division Administrator Federal Highway Administration, District of Columbia Division 1990 K St. NW, Suite 510 Washington, DC 20006

Mr. Peter May Associate Regional Director National Capitol Region National Park Service 1100 Ohio Drive, SW Washington, DC 20242

Mr. Dennis W. Kelly, Director Smithsonian Institution National Zoological Park 3001 Connecticut Avenue, NW Washington, DC 20008

District Agencies

Mr. Tom Luebke Secretary Commission of Fine Arts 401 F Street, NW, Suite 312 Washington, DC 20001

Mr. Steven A. Saari Watershed Protection Specialist District Department of the Environment 1200 First Street NE, 5th Floor Washington, DC 20002

Mr. Bryan King
District Department of the Environment
Fisheries and Wildlife Division
51 N Street, NE
Washington, DC 20002

Mr. Ronaldo Nicholson Chief Engineer DC Department of Transportation Infrastructure Project Management Administration 64 New York Avenue, NE Washington, DC 20002

Mr. Jesús Aguirre Director DC Department of Parks and Recreation 3149 16th Street, NW Washington, DC 20010 Ms. Maria Teresi Project Manager U.S. Army Corps of Engineers PO Box 1715 Baltimore, MD 21203

Ms. Barbara Rudnick NEPA Team Leader U.S. Environmental Protection Agency Region 3 1650 Arch Street Philadelphia. PA 19103

Mr. Leopoldo Miranda Supervisor Chesapeake Bay Field Office U.S. Fish and Wildlife Service 177 Admiral Cochrane Drive Annapolis, MD 21404

Mr. David Maloney State Historic Preservation Officer DC Office of Planning/State Historic Preservation Office 1100 4th Street, SW, Suite E650 Washington, DC 20024

Mr. Andrew Lewis Senior Historic Preservation Specialist DC Office of Planning/State Historic Preservation Office 1100 4th Street, SW, Suite E650 Washington, DC 20024

Mr. Ron Kirby
Director of Transportation Planning, MWCOG
Suite 300, 777 North Capitol Street, NE
Washington, DC 20002

Mr. Marcel C. Acosta Executive Director National Capital Planning Commission 401 9th Street NW North Lobby, Suite 500 Washington, DC 20004 Mr. David Levy Director, Urban Design and Plan Review National Capital Planning Commission 401 9th Street NW North Lobby, Suite 500 Washington, DC 20004

Mr. Bill Dowd Director of Planning National Capital Planning Commission

District Elected Officials

The Honorable Vincent Gray Mayor, District of Columbia Office of the Mayor 1350 Pennsylvania Avenue, NW Washington, DC 20005

The Honorable Kwame R. Brown Chair, District of Columbia Council 1350 Pennsylvania Avenue, NW, Suite 504 Washington, DC 20004

Advisory Neighborhood Commissions

Mr. Wilson Reynolds Commissioner Chair, ANC-1C 1812 Calvert St., NW Washington, DC 20008

Mr. Gregg Edwards Commissioner Chair, ANC-1D 1647 Lamont Street, NW, #201 Washington, DC 20010

Ms. Rebecca Coder Commissioner Chair, ANC-2A 2501 M Street, NW #721 Washington, DC 20037

Mr. Will Stephens Commissioner Chair, ANC-2B 9 Dupont Circle, NW Washington, DC 20036

Mr. Eric Lamar Commissioner, ANC-2D 401 9th Street NW North Lobby, Suite 500 Washington, DC 20004

Mr. Gerald Francis
Deputy General Manager
Washington Metropolitan Area Transit Authority
600 5th Street, NW
Washington, DC 20001

The Honorable Muriel Bowser Ward 4 Councilmember 1350 Pennsylvania Avenue, NW, Suite 110 Washington, DC 20004

The Honorable Mary M. Cheh Ward 3 Councilmember 1350 Pennsylvania Avenue, NW, Suite 108 Washington, DC 20004

2122 California St. NW #62 Washington, DC 20008

Mr. Ron Lewis Commissioner Chair, ANC-2E 3400 Reservoir Road Washington, DC 20007

Ms. Anne-Marie Bairstow Commissioner Chair, ANC-3C 2802 27th Street NW Washington, DC 20008

Ms. Karen Perry Commissioner Chair, ANC-3F 3003 Van Ness St., NW Washington, DC 20008

Ms. Gale Black Commissioner, ANC-4A 1761 Crestwood Drive NW Washington, DC 20011

Interested Parties

Friends of Rose Park
Mr. David L. Abrams
1410 26th Street, N.W., No. 1
Washington, D.C.
jake.chase@juno.com

Citizens Association of Georgetown Ms. Jennifer M. Altemus, President cagmail@cagtown.org

Email: cagmail@cagtown.org

Website: http://www.cagtown.org/index.html

Cleveland Park Citizens Association Ms. Susie Taylor, President tayfish@aol.com

Cleveland Park Historical Society P.O. Box 4862 staff@ClevelandParkHistoricalSociety.org;

Crestwood Citizens Association – Listserv crestwoodwdc@lists.crestwood-dc.org

Crestwood Neighborhood League clethridge@juno.com http://www.crestwoodcommunity.org/index.html

National Association for Olmsted Parks 1111 16th Street NW, Suite 310 Washington, DC 20036 info@naop.org

Friends of Peirce Mill 4305 38th St. NW Washington, DC 20016

Email: Abbott1229@verizon.net

Website: http://www.peircemill-friends.org/

Friends of Rock Creek's Environment Ms. Beth Mullin, Executive Director PO Box 42680 Washington, DC 20015

Email: force@friendsofrockcreek.org Website: http://www.friendsofrockcreek.org

Friends of Rose Park
Mr. David Dunning, President
1443 T Street, NW #1
Washington, DC 20009
Email: djs@alum.mit.edu

Website: http://www.roseparkdc.org/

Mount Pleasant Neighborhood Alliance Post Office Box 21554 Washington, DC 20009 Email: admin@mtpalliance.org

Website: http://www.mtpalliance.org/

Sierra Club Washington, DC Chapter 2437 15th St., NW Washington, DC 20009 melatar@yahoo.com (Lisa Swanson)

Washington Area Bicyclist Association 1803 Connecticut Ave. NW, 3rd floor Washington, DC 20009

Email: Barbarak@waba.org

Website: http://www.waba.org/index.php

DC Preservation League 401 F Street, NW, Room 324 Washington, D.C. 20001 E-Mail: info@dcpreservation.org

Committee of 100 1317 G Street NW Washington, DC 20005

Email: info@Committeeof100.net

GOVERNMENT OF THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER



October 19, 2011

Ms. Austina Casey Environmental Policy Analyst Planning, Policy, & Sustainability Division District Department of Transportation 2000 14th Street, NW, 7th Floor Washington, DC 20009

RE: Review of Report: Rock Creek Park Multi-Use Trail Rehabilitation, Assessment of Effects

Dear Ms. Casey:

Thank you for providing the DC State Historic Preservation Office (DC SHPO) with the above-referenced report. We have carefully reviewed the document and are writing to provide our comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act.

Historic Built Environment:

As you are aware, the DC SHPO concurred with the proposed Area of Potential Effect (APE) for the project on July 14, 2011. The report provides detailed information about the historic properties located within that APE as well as a thorough analysis of the likely effects of the three alternatives that are under consideration. Those alternatives consist of 1.) No Action, 2.) Trail Resurfacing, and 3.) Trail Resurfacing and Widening. The effects of a variety of other actions are also evaluated in the report. These actions include paving "social trails," minor alterations to trail alignments, the rehabilitation of a deteriorated historic retaining wall, the construction of a new footbridge, the removal of limited amounts of vegetation, cross walk improvements and similar improvements.

While many of the trails within the Rock Creek Park and Rock Creek and Potomac Parkway Historic Districts still follow historic alignments, the report establishes that all of the trails have continually undergone relatively minor updates and improvements such as the ones currently proposed. In addition, the rehabilitation of the retaining wall will be carried out in accordance with the *Secretary's Standards* and we understand that the National Park Service will be involved in selecting the materials that will be used for the paving of trails.

In our view, the alterations that are currently proposed will continue the tradition of relatively minor updates and improvements that are necessary to maintain a functional and efficient trail system. We do believe that any of the proposed work will substantially diminish the integrity of any historic property within the APE. Therefore, we concur with the recommended determinations of "no adverse effect" for all of the proposed alternatives as they relate to the historic built environment.

Ms. Austina Casey
Rock Creek Park Multi-Use Trail Rehabilitation, Assessment of Effects
October 19, 2011
Page 2

Archaeology:

With regard to archaeology, we also concur with the determinations of "no adverse effect" for all of the proposed alternatives because archaeological survey will be conducted in all locations where ground-disturbance in previously unsurveyed areas is proposed. We look forward to being kept informed of the results of the survey, as appropriate.

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

Sincerely,

C. Andrew Lewis

Senior Historic Preservation Specialist DC State Historic Preservation Office

10-518



District of Columbia Division (202) 219-3570 FAX 219-3545

1990 K Street, NW Suite 510 Washington, DC 20006-1103

MAY 2 1 2014

In Reply Refer To: HDA-DC

Mr. David Maloney District of Columbia State Historic Preservation Office 1100 4th Street, SW Suite E650 Washington, DC 20024

Dear Mr. Maloney:

The Federal Highway Administration (FHWA) and District Department of Transportation (DDOT) with the cooperation of the National Park Service (NPS) and the National Capital Planning Commission (NCPC) proposes to rehabilitate the Rock Creek Park multi-use trail. Federal funds are participating in the project; therefore, the requirements of Section 106 of the National Historic Preservation Act (36 CFR §800) are applicable. FHWA and DDOT have continuously consulted with your office regarding the effects of the project on historic properties; therefore, the purpose of this letter is to provide background for a determination of effects to historic properties from this project.

The Rock Creek Park Multi-Use Trail Rehabilitation Project is located in Northwest Washington, DC. The purpose of this project is to improve the overall condition and connectivity of the deteriorating Rock Creek Park multi-use trail system in order to enhance visitor use and experience within Rock Creek Park. The project area includes a 3.7-mile segment of the Rock Creek Park multi-use trail from Broad Branch Road to P Street, NW; a 4,300-foot (0.8 mile) segment of the Piney Branch Parkway trail from Beach Drive to Arkansas Avenue, NW; a 1,247-foot (0.2 mile) segment of social trail from Broad Branch Road to Peirce Mill (referred to as the Peirce Mill trail spur); a 1,929-foot (0.4 mile) segment of the Rose Park trail from P Street, NW to M Street, NW; and a 363-foot ramp connecting the Rose Park trail to P Street, NW.

The proposed action includes resurfacing; trail widening where environmentally feasible; modifications to the trail alignments and road crossings; directional and interpretive signage; and connections to and from the trails to other pedestrian and bicycle facilities. Rock Creek Park and the Rock Creek and Potomac Parkway are under the jurisdiction of the NPS; however, implementation of the proposed action will be administered by DDOT and funded by FHWA. The majority of the proposed improvements are located on NPS land, with some improvements located within the District of Columbia right-of-way. A segment of the trail also passes through National Zoological Park property.

After considering the criteria of adverse effect and potential effects of the build alternatives on the integrity of each property and consultation with your (SHPO) office, FHWA has determined that this project will have "no adverse effect" on historic properties and archaeological resources as defined by 36 CFR 800.

Consistent with the request of your office in the letter dated March 19, 2019 (enclosed), FHWA and DDOT also agree to carry out the following:

- 1. SHPO will be provided an opportunity to review and comment on the additional information such as maps, plans,, and detailed project descriptions that defined the undertaking in more details; and
- 2. In consultation with the SHPO, DDOT shall conduct archaeological survey in all locations where ground disturbance in previously unsurveyed areas is proposed and any locations warrant testing for the presence of potentially significant archaeological resources.

Based on your letter to DDOT dated October 19, 2011 (enclosed), we understand that your office has also determined that this project will have "No Adverse Effect" and concur with our determinations on these properties as defined by 36 CFR 800.

Sincerely,

Joseph C. Lawson Division Administrator

Enclosure

Cc: Faisal Hameed, DDOT
Austina Casey, DDOT
Andrew Lewis, DC SHPO
Carol Legard, ACHP

GOVERNMENT OF THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER



June 2, 2014

Mr. Joseph C. Lawson Division Administrator U.S. Department of Transportation Federal Highway Administration District of Columbia Division 1990 K Street, NW, Suite 510 Washington, DC 20006-1103

RE: Section 106 Determination of Effect for Rehabilitation of the Rock Creek Park Multi-Use Trail

Dear Mr. Lawson:

Thank you for your recent letter to the DC State Historic Preservation Office (DC SHPO) regarding the above-referenced Section 106 review. Based upon our review of your letter and earlier project-related submittals from the National Park Service and DDOT, we are writing to reiterate our comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act.

As you are aware, we provided initial comments on the undertaking to the National Park Service in a letter dated March 19, 2009. Subsequently, we reviewed an assessment of effects report and wrote to DDOT on October 19, 2011 to document our concurrence with the report's findings – specifically that the undertaking would have "no adverse effect" on historic properties.

In reviewing our 2011 letter again, we noted that there was one error which we now wish to correct. The last paragraph on page one incorrectly states that: "We <u>do</u> believe that any of the proposed work will substantially diminish the integrity of any historic property within the APE." (emphasis added). That sentence should have read: "We <u>do not</u> believe that any of the proposed work will substantially diminish the integrity of any historic property within the APE."

Therefore, we also concur with FHWA's finding that rehabilitation of the Rock Creek Park Multi-Use Trail will have "no adverse effect" on historic properties – including archaeological resources. If any revisions or additional ground disturbance are proposed for the project, please notify us as soon as possible. Otherwise, we do not believe that any further review or comment by the DC SHPO will be necessary.

Please contact me at andrew.lewis@dc.gov or 202-442-8841 if you have any further questions or comments regarding the historic built environment. Questions regarding archaeology should be directed to Ruth Trocolli at ruth.trocolli@dc.gov or 202-442-8836. Thank you for providing this additional opportunity to comment.

Sincerely,

Senior Historic Preservation Specialist DC State Historic Preservation Office

10-518