

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
STATE HISTORIC PRESERVATION OFFICER



November 22, 2011

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

RE: Initiation of Section 106: CSXT New Jersey Avenue Track Lowering and Virginia Avenue Tunnel Replacement; "National Gateway Initiative" - CSX Transportation Inc., Washington, DC

Dear Mr. Lawson:

Thank you for formally initiating the Section 106 review process for the above-referenced undertaking with the DC State Historic Preservation Office (DC SHPO). We are writing to provide our initial comments regarding effects on historic properties.

As you are aware, we wrote to the District Department of Transportation (DDOT) and the Federal Highway Administration (FHWA) on September 8, 2011 to summarize our informal coordination with CSX Transportation Inc., to date, and to provide copies of our prior correspondence.

In response to your recent letter, we have reviewed the draft Area of Potential Effects (APE) and concur that it is generally appropriate to take into account the effects of the undertaking as we currently understand it. Revisions to the APE may be necessary as we learn more about the proposed scope of work and the manner in which it will be carried out.

With regard to potential consulting parties, we understand that FHWA and DDOT are preparing a draft list of potential parties but we recommend that the following groups be notified and invited to participate in the consultation:

- Barracks Row MainStreet
- St. Paul's African Union Methodist Church
- The affected Advisory Neighborhood Commission(s)
- The Committee of 100 on the Federal City
- The U.S. Marine Corps
- The U.S. Navy

Property owners and other organizations and individuals in the immediate project area should also be contacted to determine whether they have any particular interest in effects on historic properties. We request to be notified of the groups that do express an interest in participating in the consultation. We note that the Capitol Hill Restoration Society has already requested consulting party status.

In order to move forward with the Section 106 process, we will require additional information about the scope of the project – especially as it relates to the Virginia Avenue Tunnel – so that we can begin to identify the potential direct and indirect effects of the undertaking. We understand that an Environmental Assessment (EA) will be prepared for NEPA compliance but a separate summary that specifically addresses the effects of the undertaking on historic properties would be helpful, if possible.

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With regards to archaeology, two parcels (Reservations 122 and 126) within the proposed APE were surveyed in 2010 by John Milner & Associates, Inc., and no archaeological resources were identified. The DC SHPO concurred with the results of that study and a final copy of the report is now on file here (DC SHPO Archaeological Report # 478). Additional investigations may be needed in other parts of the APE and any survey areas will be determined in ongoing Section 106 consultation as the project scope and detailed plans are developed.

An additional archaeological concern is the effect(s) of the project on two sites within former square 999, identified during a survey for the 11<sup>th</sup> St. Bridges project. The proposed APE appears to cross these two sites, 51SE057 and 51SE062, but it is unclear exactly what level of activity is planned for them. These two sites will also be discussed during the Section 106 consultations for the proposed project.

We look forward to consulting with all parties to identify effects on historic properties and to resolve any adverse effects. If you should have any questions or comments regarding this matter, please contact me at [andrew.lewis@dc.gov](mailto:andrew.lewis@dc.gov) or 202-442-8841. Questions and comments relating to archaeology should be directed to Ruth Troccoli at [ruth.troccoli@dc.gov](mailto:ruth.troccoli@dc.gov) or 202-442-8836.

Sincerely,



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

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cc: Elizabeth Purcell, CHRS  
Keith Brinker, CSX  
Mike Hicks, FHWA  
Stephen Plano, Parsons Brinckerhoff