

CAPITOL HILL RESTORATION SOCIETY

P.O. Box 15264 Washington, DC 202.543.0425

November 19, 2012

Mr. Joseph C. Lawson
Administrator, DC Division
Federal Highway Administration
1990 K Street, NW, Suite 510
Washington, DC 20006-1103

Subject: Section 106 Review of the Virginia Avenue Tunnel Project

Dear Mr. Lawson:

The Capitol Hill Restoration Society (CHRS) appreciates the opportunity to participate as a Consulting Party in the Section 106 review of the Virginia Avenue Tunnel Project (VAT), which would cross the Capitol Hill Historic District and could have serious effects on numerous historic properties. The meetings this year with Consulting Parties have been very helpful and informative, and CHRS would like to offer some comments based on information presented at the most recent of these meetings and at the public meeting in late September.

L'Enfant Plan and the Capitol Hill Historic District

CHRS agrees with the preliminary assessment that the project will have adverse effects on both the L'Enfant Plan and the Capitol Hill Historic District. For example, Virginia Avenue Park, which is a contributing property in both the Plan and the Historic District, will not only suffer visual effects during construction, but it would also be physically torn up during construction in all of the Build Alternatives and used for an open runaround track in Alternative 2. We also remain concerned about effects on Garfield Park, which is adjacent to the tunnel's east end, as well as on many contributing buildings.

We urge that those engaged in assessing effects look beyond visual effects, which seemed to be emphasized in the Preliminary Effect Assessment, and give further consideration to other effects, including vibrations both from trains running in open trenches and from heavy equipment, trucks, demolition, and earthmoving. In particular, we are concerned that Alternative 3 would involve a new permanent track alignment that could be as much as 20 feet farther south than the present tunnel, putting heavy trains even closer to fragile historic structures south of the freeway. Similarly, the temporary open runaround track needed for Alternative 2 would be closer to those fragile buildings when compared to Alternative 4, potentially subjecting them to substantial vibrations from moving trains unbuffered by an enclosed tunnel. Since no one staffing the breakout sessions at the last public meeting could tell us how close tracks would be to historic structures in the Build Alternatives, it would be very helpful for the DEIS to provide fairly precise information regarding the proximity of both runaround and permanent tracks to historic properties so measures to avoid, minimize, and mitigate adverse effects can be evaluated more knowledgeably.

CHRS is not inclined to assume that there would be no effects on the Washington & Georgetown Railroad Car House, which is a contributing property in the Historic District as well as being individually listed. Again, visibility is not the only concern here, and other effects such as vibrations need to be considered as well. In addition, if other possible impacts from noise, traffic, and construction activity were to affect the attractiveness of this building for adaptive reuse or postpone its redevelopment and thus lead to deferred maintenance or neglect, we would consider that to have an adverse effect.

We agree with Mr. Andrew Lewis of the DC Historic Preservation Office (HPO) that traffic issues affect the settings and use of historic properties and should be considered more carefully as well. The effects of traffic diversions, for instance, should be thought about in terms of whether they could direct heavier vehicles onto narrow residential streets than usual, which in turn could lead to damaging vibrations. Effects of traffic and construction activity on and around 8th Street should also receive careful scrutiny for their potential to disrupt pedestrian and vehicular access to the full length of Barracks Row Main Street businesses. Especially since this project would involve earthmoving and trenching across a historic district in close proximity to fragile historic structures, effects and their avoidance and minimization need to be thoughtfully studied.

Other Historic Properties

Virginia Avenue Tunnel – This clearly will be adversely affected if the project goes forward. It is not too soon to begin the tunnel's thorough recordation to Historic American Engineering Record standards, which should be undertaken in any case, if it hasn't been conducted already, due to its historic significance.

Archeological Site(s) – Since the Belgian Block Paving (51SE062) found during 11th Street Bridge construction could extend into the VAT project site, a presumptive adverse effect may be appropriate for this eligible site. For the M Street Midden, there doesn't appear to be enough information available to Consulting Parties to know whether it's eligible.

Navy Yard, Its East Extension, and Contributing Structures – CHRS is not in a position to evaluate the appropriateness of the preliminary no effect assessment for these properties and defers to the Navy's views.

St. Paul AUMP Church – CHRS does not agree with the preliminary no adverse effect assessment regarding the church. This historic structure is perilously close to the project site, and it stands to be adversely affected by vibrations and earthmoving activities as much as any historic structure within the historic district. Just because a building is eligible for its association with historic events does not mean that threats to its physical integrity can be ignored or dismissed. We believe it would be a mistake to assume this structure could not be damaged by vibrations or subsidence and therefore ask that an adverse effect finding be seriously considered.

Marine Barracks and Commandant's House NHL – CHRS is not in the best position to evaluate the appropriateness of the preliminary no effect assessment for these

properties. However, though effects on the Commandant's House appear unlikely, we question whether it's really feasible to confidently rule out every possible adverse effect on the southernmost of these structures at least. At the last meeting with Consulting Parties, DDOT stated that it would go for the "higher" call in the event of doubts or temporary adverse effects. We suggest that DDOT and FHWA consult very closely with the Marine Corps, Navy, and SHPO in exploring and anticipating all possible adverse effects to the Marine Barracks.

CHRS looks forward to additional meetings with Consulting Parties and further information about the results of the various tests and analyses that are being conducted, including those involving noise, traffic, vibrations, and long-range and cumulative effects. The ongoing exchange of information and views among the involved agencies, project proponents, and concerned organizations and individuals has been very productive.

Sincerely,

Shauna Holmes

Shauna Holmes
Chair, Historic Preservation Committee

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