

CAPITOL HILL RESTORATION SOCIETY

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September 25, 2013

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

Subject: Section 106 Comments on the Draft Environmental Impact Statement for the CSX Virginia Avenue Tunnel Project in Southeast Washington, DC

Dear Mr. Lawson:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the CSX Virginia Avenue Tunnel Project (Project) in Southeast Washington, DC, under the provisions of Section 106 of the National Historic Preservation Act. The Capitol Hill Restoration Society appreciates the opportunity to provide its comments to the Federal Highway Administration, District of Columbia Division (FHWA-DC), cooperating federal agencies, DC Department of Transportation (DDOT), and CSX about effects of the proposed project on historic properties. CHRS, which is a consulting party in the Section 106 review of the Project, is the oldest and largest civic organization on Capitol Hill and one of the largest in the city. We are committed to preserving the historic fabric and character of Capitol Hill and protecting its historic resources, neighborhoods, environment, and residential nature, and to that end, we submitted scoping comments two years ago which expressed our initial concerns about potential adverse effects this project could have in our community. This comment letter will echo and expand upon those concerns regarding historic properties, while a separate comment letter submitted by CHRS in response to the DEIS addresses a much wider range of Project impacts.

CHRS agrees that the official overall finding of adverse effect for the Project, which is anticipated in the Draft Section 106 Assessment of Effects for Historic Properties (Assessment) (DEIS Appendix I), is appropriate for this Project, which will have wide-ranging and prolonged adverse effects on a number of historic properties, including some that are not acknowledged in the DEIS and Section 106 Assessment of Effects. While the Assessment draws a fine distinction on page 15, asserting that an adverse effect finding is only appropriate when a character-defining feature or aspect of a historic property is adversely affected, CHRS maintains that any effect from the Project that results in any damage to the structural integrity of a historic property also constitutes an adverse effect. This view is supported in examples of adverse effects in 36 CFR § 800.5, where the first example given is "Physical destruction of or damage to all or part of the property." Our comments regarding the findings follow.

The complete loss of important Capitol Hill historic properties such as the Virginia Avenue Tunnel and the Virginia Avenue Paving, the adverse effects on numerous

others such as the Capitol Hill Historic District (CHHD) and the L'Enfant Plan for the City of Washington, and potential adverse effects not acknowledged in the DEIS such as vibration impacts on fragile historic buildings in the CHHD are among the reasons CHRS supports the No Build Alternative. This is the only alternative that avoids adverse effects to all of the historic properties in the Project area; the other three alternatives involve loss of the historic tunnel and paving, cause adverse effects on many historic properties, and present undue risk to many other historic properties.

St. Paul AUMP Church

We agree that the Project would have an adverse effect on the setting of this property, which is directly adjacent to the Limits of Disturbance (LOD), for all the reasons set out in the Assessment. However, we are concerned that the church's immediate proximity to the LOD could make it vulnerable to potential damage from vibrations, which could compromise its structural integrity and thus compromise the integrity of its *materials*. The project team is to be commended for its site visit to gather information on existing conditions, and for designating 3rd Street SE rather than 4th Street as a haul route for heavy equipment. We recommend that the FEIS and Memorandum of Agreement (MOA) or Programmatic Agreement (PA) include a commitment and/or stipulation to provide ongoing vibration monitoring during construction. In addition, it should be stipulated that the Pastor or her designee will be notified well in advance of vibration-related work to ensure appropriate mitigation measures are taken and monitoring is in place.

Virginia Avenue Tunnel

We agree with the finding of adverse effect due to the Project's destruction of the tunnel, which will adversely affect all seven aspects of its historic integrity. This would be a major loss of an important Capitol Hill historic property, and is one of the reasons CHRS supports the No Build Alternative. Full and comprehensive documentation of the tunnel and its historic significance should be completed prior to beginning construction, and we recommend that it be done in accordance with the Secretary of the Interior's Standards for Architectural and Engineering Documentation. The Project should also include a commitment to make this documentation available to the community, the DC State Historic Preservation Office (SHPO), the Historic American Engineering Record (HAER), railroad organizations, the Federal Railroad Administration (which can include it among other educational materials on its website), and local schools. We also recommend that CSX use the information to create a public interpretive exhibit at Garfield Park, near the 2nd Street entrance to the tunnel, at CSX's expense, in cooperation and consultation with DC SHPO, Friends of Garfield Park, CHRS, and ANC 6B.

Virginia Avenue Paving

This historic resource, which is not only rare but intact, would be completely lost because of the Project, so CHRS agrees with the finding of adverse effect. Our community treasures these remnants of the city's 1880s paving and transportation network, and we don't want to lose them *in situ*. Determining the appropriate treatment of these rare resources must be the subject of consultation among all of the consulting parties, including CHRS, ANC 6B, and other organizations and agencies.

While some have suggested potential reuse of the paving blocks if these archeological sites are dug up during construction, that kind of mitigation should be a last resort rather than presumed to be inevitable at this time. Much of this resource's significance lies in its setting and other attributes of historic integrity, so salvaging only the paving blocks is an outcome CHRS is not willing to accept at this stage of consultation.

Christ Church, Washington Parish

We are concerned that the justification for a finding of no effect does not appear to have sufficiently taken into account the fragility of this 207-year-old building. Many historic buildings throughout Capitol Hill were damaged during the 2011 earthquake, including Christ Church, which suffered damage in its sanctuary that is still visible and possibly other damage as well. Knowing of the church's vulnerability to vibration damage, CHRS is dubious about assumptions that distance from the construction site would ensure no effects to this church due to the VAT Project, since any damage to any part of the building would constitute an adverse effect. We recommend a commitment that the project team pay a pre-construction visit to Christ Church, as it did for St. Paul AUMP Church, to conduct a pre-construction assessment and discuss with the church's Vestry, Rector, and Property Committee any concerns they may have related to Project effects and monitoring during construction.

Randall Junior High School and the Capitol Police Horse Barn

CHRS is not in a position to gauge the potential vulnerability of these buildings to potential structural damage from vibrations due to construction itself, though we note that the buildings are adjacent to or on South Capitol Street, a major designated haul route for the Project, which would subject them to more heavy equipment activity than under the No Build Alternative's current conditions. We support monitoring the Capitol Police Horse Barn during construction to confirm the finding of no effect from vibrations, which is noted in the Assessment, and suggest that such monitoring to confirm a no effect finding for the Randall School would also be appropriate.

Historic Properties under the Jurisdiction of the Navy and U.S. Marine Corps

Because the Navy and Marine Corps are far better equipped than we are to evaluate the Draft Section 106 Assessment findings about their buildings, we defer to their judgment regarding these historic properties, as expressed in their comments on the DEIS and Section 106 assessment of effects.

Capitol Hill Historic District

CHRS strongly supports the finding that the Project will have an adverse effect on the CHHD, for all of the reasons enumerated in the Assessment. With the open-trench Project running right through the CHHD and tearing up such contributing properties as Virginia Avenue and its streetscape, parts of intersecting streets, and Virginia Avenue Park, the adverse effects on the CHHD's setting are obvious. However, the Assessment does not sufficiently acknowledge the full scope of potential adverse effects to other contributing properties in the CHHD, including those below the freeway and others north of it that could also experience adverse effects.

Lower 8th Street. This portion of the CHHD, much of which is also included in the Lower 8th Street SE Overlay and is part of Barracks Row Main Street, was added in 2003 specifically to protect the remaining historic properties threatened by development, demolition by neglect, and other projects. Quite a few historic buildings in this area had already been lost, and CHRS contributed substantially to the nomination, which added Squares 906, 907, 929, 930, and 952, as well as Reservation 126 (Virginia Avenue Park) and Reservation 251. In 2003, there were 42 contributing buildings and 2 contributing sites in the annexed area, and nearly all of the contributing buildings remain.

This portion of the CHHD will be directly and adversely affected by the Project, disrupting its setting and cutting it off even more from the rest of the CHHD and upper Barracks Row. The LOD for all three build alternatives borders and penetrates into this area of the CHHD. Businesses are likely to suffer reduced patronage due to the noise, dust, and mess of construction, to say nothing of the haul routes going directly along 8th, L, and 7th Streets. These potential adverse economic effects could threaten the businesses themselves and make them unsustainable, and empty buildings are more vulnerable to demolition by neglect, as we have seen earlier in this area.

The DEIS correctly points out that older buildings are more susceptible to ground-borne vibration damage because of their methods of construction, but the Assessment fails to acknowledge that very fragile historic buildings in the CHHD near the LOD could be damaged by vibrations. This needs to be corrected in the FEIS. Many contributing buildings in the CHHD were damaged by the earthquake two years ago, and some were damaged by Metro construction. They are uniquely vulnerable to vibration in relation to newer nearby buildings, and some in the CHHD even suffered vibration damage when a Metrobus route was changed, sending the buses onto narrow residential streets. Worse, the DEIS and its vibration report do not take into account the fragility of the contributing buildings in the lower CHHD, with no vibration readings done there at all. The closest vibration readings were done at the Marine Quarters and Recreation Center, a new building on recently disturbed ground, and at the eastern tunnel terminus, where the composition of the ground is likely to be much different from that in the CHHD.

Some of the buildings here are among the oldest in the CHHD, dating to pre-1824, pre-Civil War, and the mid-19th century, and claiming as the Assessment does that “none of these construction components, such as...vibration...individually may cause an adverse effect” on the historic district will not make it true. For one thing, damage from vibrations can be cumulative and not necessarily result from a single incident. One owner of buildings very close to the LOD has told me that he fully expects his buildings to suffer damage from the Project’s vibrations. Drawing the boundary of the LOD right along the property lines of historic buildings, or within a few yards of them, does not mean that vibration damage does not need to be taken into account in the Lower 8th Street area. Putting haul routes directly through the CHHD along 7th, 8th, 9th, and L Streets, as shown in Figure 3-14, is similarly ill-advised, since these trucks and heavy equipment will be passing within a few feet of very old and very fragile buildings; to identify a few: 700 L Street SE (1854-55); an intact group of 1888 rowhouses along the east side of 7th Street in Square 906; 1112-1114 8th Street (1833);

the landmark Washington & Georgetown Railroad Car House (1891); and 1102 8th Street (pre-1824). Alternative haul routes need to be identified and used that would not traverse the CHHD. A long stretch of late 1880s rowhouses at 911-927 Potomac Avenue directly faces Virginia Avenue Park, which will be trenched through and be used for construction staging, exposing them to similar potential damage.

We consider the DEIS vibration methodology in evaluating vibration from trains to be flawed, given that both construction and post-construction vibration from trains has been done based only on single-stacked, single tracked trains in the current tunnel, which is as much as 25 feet farther away from the buildings than the double-stacked trains will run on parallel tracks. No real analysis of the vibration impacts from double-stacked trains, either in an open trench like the runaround track or in the finished enclosed tunnel, has been done. Neither has analysis of the impacts of two long, heavier, double-stacked trains running at higher speeds and/or passing each other been presented. Rather, assertions are made, with no supporting data provided, that there will be no effects. In addition, the analysis did not include vibration projections for occasions when more than one type of vibration-producing equipment is in use or combined with vibrations from trucks on haul routes. Better, more comprehensive, and more relevant data needs to be gathered for the FEIS, including on combined and cumulative effects, and analyzed in relation to the fragile historic buildings in the historic district.

At the public meeting in July 2013, FHWA promised pre-construction reports on buildings in the Project area. FHWA was silent, however, on key features regarding these reports, including: what buildings would be assessed and reported on, when assessments will be done, identification and qualifications of persons making the assessments and reports, content of reports (descriptions, photographs, analysis, potential for damage from construction or post-construction vibration), and availability of the entire report to the building owner and the public.

CSX and the lead agencies need to acknowledge that Project-related vibration has great potential to damage fragile historic buildings and step up to the plate with a thorough pre-construction assessment of each contributing building in this part of the CHHD, at no cost to the owners, followed by comprehensive vibration monitoring during construction, as well as for a while post-construction, in order to confirm findings in the DEIS and Assessment, quickly identify any threatening vibration, and take necessary action to prevent damage. Any damage to or loss of historic building fabric in the CHHD would be unacceptable.

CHRS takes issue with the assertion on page 14 of the Assessment that "...it is currently anticipated that the...Project will have no actual...vibration impacts that would result in adverse effects." The Project's MOA or PA must contain measures to confirm and monitor this and also provide stipulations for carrying out the measures recommended above.

Barracks Row Main Street (BRMS). This recently revitalized and thriving commercial corridor in the CHHD will be cut through by the Project, which will hinder efforts to revitalize the lower portion of BRMS and possibly compromise patronage of businesses near the Project. Business owners on BRMS, particularly nearest the Project, stand to lose customers during construction, whether due to difficult access, loss of sidewalk

café seating due to construction noise, traffic, and dust, or great difficulty finding parking. Since 108 on-street parking spaces will be lost during construction, the latter is no small matter. With some businesses operating on a slender margin as it is, any impacts on businesses housed in contributing buildings need to be taken into account. Success of this historic commercial corridor is vital to the CHHD, and empty and/or poorly maintained contributing buildings would compromise the setting, feeling, and possibly the building fabric. Economic effects to businesses in contributing buildings can have reasonably foreseeable effects on maintenance and possible vacating of these properties.

Virginia Avenue Streetscape. Streetscapes are integral components of the CHHD, including their vegetation and tree canopies. The Assessment is silent regarding the effects on the historic district of tearing up this streetscape and dozens of street trees along the Avenue, a striking omission. Loss of this streetscape would take years to mend, and we're concerned that realigning the VAT could lead to difficulty replacing all of the lost trees, since there might not be room for root systems in some places. Even restoration will be a pale imitation of the lost mature trees along Virginia Avenue and in Virginia Avenue Park, since it will take at least a couple of decades for new trees to approach maturity.

Contributing buildings north of the freeway. While we would like to be confident that none of these could be harmed by construction, it is possible for some of these contributing buildings to be damaged by vibrations, especially those near cross streets that cut through the protective mass of the freeway embankments. We strongly recommend that pre-construction assessments and monitoring during construction be offered to all owners of contributing buildings in this part of the Area of Potential Effects, which like those south of the freeway are also very old, very fragile, and very susceptible to vibration damage. There will also need to be a robust reporting system in place through which owners can immediately notify CSX of any damage, have the cause halted until remedies are in place, request ongoing vibration monitoring, and have the cost of repairs covered by CSX.

Garfield Park. This contributing property in the CHHD appears unlikely to be directly affected by the Project, although a commitment to that effect should be included in the FEIS, along with the commitment to provide wayfinding signs while access to the Park from 2nd Street south of the freeway is cut off.

Washington & Georgetown Railroad Car House. This 1891 building, known locally as the Blue Castle, is landmarked in its own right and is also a contributing building in the CHHD, anchoring the southwest corner of the CHHD. CHRS does not agree that the Project would have no effect on this building, since the materials and structural integrity of the building could be damaged by Project-related vibrations. We pointed out at the July 31, 2013, consulting parties meeting that the claim in the Assessment that the Blue Castle is separated from the project work by "dense urban development that spans the intervening spaces" is incorrect. Its northeast corner is only a few yards from the LOD at the intersection of 8th and L Streets and a mere half-block from the tunnel construction corridor. The single trapezoidal "square" between the Blue Castle and the tunnel trenching isn't even a full block deep at all points, and any observer can see that it is mostly composed of vacant lots and 2-story historic buildings, with only a small handful of 3- and 4-story buildings. This is not "dense

urban development” in any respect, and it would provide very little, if any, buffering for the Blue Castle from project-related vibrations. Indeed, any buffering would be done by other historic buildings, not a desirable circumstance.

Making matters worse, the proposed haul route would pass immediately outside the Blue Castle on both 8th Street and L Street, bringing additional vibrations right up to the project’s boundary. I worked over 20 years on the top floor of the Old Post Office Building, another even larger stone Romanesque building of similar vintage, and we could feel the vibrations whenever a truck hit a bump on 12th Street directly outside the building. The owners of the Blue Castle should receive a free pre-construction building assessment from the Project team, along with vibration monitoring during Project construction; stipulations to this effect must be included in the MOA or PA.

L’Enfant Plan of the City of Washington

CHRS agrees that the Project will have an adverse effect on the L’Enfant Plan, particularly by tearing up Virginia Avenue and Virginia Avenue Park, destroying the trees and other vegetation along the Avenue and within the Park, and otherwise disrupting the Plan’s setting in this area. We take issue with the assertion in the Assessment that “Project activity would not alter the plan’s feeling...”; while this may be true of the overall Plan, the feeling of the Plan and its components in the Project area will quite clearly be adversely affected. While straightening Virginia Avenue subsequent to VAT reconstruction would better follow its original alignment, care must be taken regarding the small L’Enfant reservations, triangles, and other small pieces to ensure that their siting respects the original Plan.

Virginia Avenue Park. This contributing property in both the Plan and the CHHD will take a real beating from the Project, so the adverse effect finding is appropriate for this historic and 4(f) resource. While trenching through the Park may be unavoidable if a build alternative is selected, CHRS objects to CSX using the Park for Project staging, which would considerably expand damage to the *material* of the Park. We objected to such use for the 11th Street Bridge Project, and project managers managed to find alternative staging areas. There was no indication in the 4(f) report that alternative staging areas were considered, seriously investigated, and deemed not feasible or prudent, and we strongly recommend that CSX look elsewhere for its Project staging. Consultation with DDOT and owners of vacant property in the area might prove fruitful.

Page 4 of the Assessment states that “CSX has committed to provide community benefits as part of the Project”, including restoring Virginia Avenue and “affected areas of Virginia Avenue Park”. We commend CSX for offering such restoration, but it should not be limited only to those portions of the Park that CSX deems to have been “affected.” Rather, restoration of the Park must be planned and undertaken comprehensively and include the entire Park and its various parts, features, materials, vegetation, and uses. Consultation regarding restoration of the Park and Avenue must include members of the community, including the ANCs and community-based organizations, and stipulations regarding restoration must be included in the Project MOA or PA.

Thank you for taking our comments and concerns into account in the environmental and historic preservation reviews of this Project. CHRS looks forward to participating in continued Section 106 consultation as review and monitoring of the Project move forward.

Sincerely,

Shauna Holmes

Chair, Historic Preservation Committee

cc:

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