

Case Study – District of Columbia

RECONSTRUCTION OF O AND P STREETS IN THE GEORGETOWN NATIONAL HISTORIC LANDMARK DISTRICT

DESCRIPTION OF THE PROJECT:

FHWA, District of Columbia Division, proposes to provide Federal funds to the District of Columbia Department of Transportation (DDOT) to complete streetscape improvements on O and P Streets from Wisconsin Ave. to 37th Street, NW, in historic Georgetown. These sections of O and P Streets are in need of repair. The granite block paving is currently patched with asphalt, producing an irregular surface with sinkholes created by leading water mains buried beneath the paved surface. The proposed project includes reconstruction of portions of both O & P Streets, including new curb and gutter, sidewalks, wheel chair ramps, streetlight and signage improvements, as well as replacement of the deteriorated water main and household service connections.

AFFECTED HISTORIC PROPERTIES

The project will occur within the Georgetown National Historic Landmark (NHL) District and is needed to repair the structural integrity of the roadways on both O and P Streets. The proposed project will have no direct impact on the historic residences and other buildings that contribute to the NHL District, but it will alter the existing streets, including the circa 1880s-1890s granite block paving, bluestone curbs, and brick sidewalks; as well as the streetcar trolley tracks built in 1895. An Act passed by Congress in 1889 forbid construction and use of overhead wires for streetcars in the cities of Georgetown and Washington. The trolley tracks throughout the city were therefore built with an underground electrical conduit system. By the early 1920s, there were approximately 115 miles of conduit track in the city, including the tracks on O and P Streets. Washington DC was one of only three cities in the world to use underground conduits (the others were New York City and London). The tracks on O and P Streets are the last publicly visible remnants of this innovative system in America. The visible streetcar rails and the buried infrastructure represent a significant property type in the history of rail transportation and are a contributing feature of the NHL District.

The project calls for the removal of the existing streetcar trolley tracks, granite pavers, curbs, gutters, sidewalks, and other historic features within the O and P Street Right-of-way; improvements to the substructure and replacement of waterlines; and the rehabilitation and replacement of historic materials to the streetscape.

ANALYSIS OF CONSULTATION AND AGREEMENT:

The rehabilitation of O and P Streets was initially proposed by DDOT in 2003 in order to repair the structural integrity of the deteriorated and increasingly dangerous granite-paved residential streets in the Georgetown Historic District and NHL District. DDOT applied to the Federal Highway Administration (FHWA) for funding for the project. The ACHP initially declined to participate in consultation after receiving a notification of adverse effects from FHWA on

September 8, 2004. The DDOT, FHWA, and DC Historic Preservation Office (SHPO) worked together to identify measures to minimize the effects of the project on the National Historic Landmark, and had involved the public in development of the project, which was focused on rehabilitating the streets in a manner sensitive to the historic character of the district.

On Feb. 15, 2005, a property owner and resident within the project area contacted the ACHP requesting that we reconsider our 2004 decision not to participate in consultation for this project. The property owner and her husband expressed strong objections to DDOT's proposal to remove the historic streetcar trolley tracks from P Street, and sought our assistance in urging DDOT to preserve the tracks in place on both O and P Streets. Although the ACHP discussed these concerns with FHWA and the DC SHPO, we did not formally enter consultation at that time. Although not formally involved, the ACHP staff continued to provide FHWA with advice on the project; encouraging FHWA to request the National Park Service National Historic Landmarks staff (NPS) participate in consultation, and recommending the identification of consulting parties in the Section 106 process. The ACHP also recommended that FHWA host a meeting of consulting parties to facilitate the exchange of views regarding the removal of the trolley tracks and other historic preservation issues. FHWA, DDOT and SHPO had agreed to a compromise that would save the trolley tracks on O Street, but allow the tracks on P Street to be permanently removed. Initial consultations with the DC Water and Sewer Authority (WASA), indicated that needed improvements to the waterlines beneath P Street could not be accomplished unless the tracks were removed. Additional residents of the historic district raised objections to the loss of the streetcar trolley tracks from P Street, and on November 1, 2006 the ACHP received another request for formal participation in consultation. On November 20, 2006, the ACHP notified FHWA that it would participate in consultation to help resolve the concerns of parties objecting to the removal of the trolley tracks from P Street.

Consultation continued with ACHP involvement and was focused on the proposed removal of the trolley tracks. Many local residents requested consulting party status, and many expressed the desire to get on with the project, despite the loss of the tracks. A lively and well-attended Section 106 consultation meeting was held on May 10, 2007, and as a result FHWA and DDOT took a serious second look at whether the trolley tracks on P Street could be preserved. Because of the status of the district as a National Historic Landmark (NHL), the ACHP urged FHWA to comply with the special requirements for protecting NHLs: calling for the agency official, to the maximum extent possible, to undertake such planning and actions as may be necessary to minimize harm to any NHL that may be directly and adversely affected by an undertaking (36 CFR 800.10). Although the project was carefully planned to protect the historic character of the streetscape, removal of the trolley tracks was problematic in this context. FHWA was also required to complete an analysis of alternatives under Section 4(f) of the Department of Transportation Act, which provides that transportation agencies to identify a least harm alternative to 4(f) resources, including historic properties. As a result of these studies and further discussions with WASA, the DDOT and FHWA identified a least harm alternative that would allow the removal, rehabilitation, and replacement of the trolley tracks and the subsurface yokes where they are currently visible on both O and P Streets. With the agreement of the DC SHPO and ACHP, consulting parties were notified that DDOT proposed adopting this least harm alternative to resolve the effects of the project on the Georgetown NHL District.

A Memorandum of Agreement (MOA) was drafted by DDOT in consultation with the SHPO, FHWA, and ACHP and was circulated to the consulting parties for review. The P Street resident that initially contacted the ACHP and convinced us to participate in consultation remains unhappy with the resolution, raising concerns about the ability of DDOT to remove, then replace

the tracks as proposed in the draft MOA. Other consulting parties that commented expressed satisfaction with the outcome and the draft MOA.

The MOA was executed by the FHWA, DDOT, DC SHPO, and the ACHP on November 23, 2009. Access a copy of the MOA: http://www.achp.gov/docs/FHWA_DC_MOA.pdf. It includes provisions to ensure that the rehabilitation of O and P Streets is carried out in a manner that retains their historic appearance, including retaining and reinstalling components of the street car tracks and the surrounding pavers and curbs, while restoring the original, even street surface. Sidewalks will be rehabilitated using existing historic Georgetown brick, to the extent possible, with new matching brick used to fill in if a sufficient number of historic bricks cannot be obtained. Dust abatement measures and vibration studies will be used to ensure that adjacent historic buildings are not damaged and construction activities will be monitored by a qualified archaeologist to ensure that significant archaeological remains, if present, will be documented and reported following professional standards. Historic elements of the streetscape and streetcar tracks that cannot be rehabilitated and reused shall be made available to a museum or other appropriate repository.

LESSONS LEARNED

This is a very successful outcome which will not only minimize harm to the Georgetown Historic District and NHL, but will improve the overall historic character of the district when completed. The involvement of the ACHP in consultation helped FHWA and DDOT better understand the special requirements for protecting National Historic Landmarks, and the importance of completing the analysis of alternatives required in Section 4(f) before Section 106 review is completed.

Public involvement and the identification of consulting parties are critical aspects to the Section 106 process, and by inviting the participation of local residents and preservation organizations, FHWA was able to obtain useful information and an exchange of ideas that ultimately resulted in identifying an alternative that would leave the trolley tracks intact. Although FHWA, DDOT and SHPO had initially agreed to a compromise that would retain the tracks on O Street, but allow their removal from P Street, concerns raised by the public and the ACHP resulted in their taking a harder look at their options. As consultation progressed, it became increasingly apparent that the tracks on O and P Streets were valued by many local residents and that, as the last remaining example in America of streetcar tracks using this underground conduit system, the loss of the tracks from either O or P Street would be regrettable. Although the street car system is no longer functional, the retention of the street car trolley tracks on O and P Streets will preserve an important element of the District and be a visual reminder of a time when street cars served a critical transportation function. In this case, the special requirements for NHLs and for the protection of Section 4(f) properties; as well as the perseverance of local advocates lead to an outcome that will preserve the streetscape, including the trolley tracks, for future generations.

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