

CAPITOL HILL RESTORATION SOCIETY



P.O. Box 15264
Washington, DC 20003-0264

July 3, 2011

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

RE: Virginia Avenue Tunnel Project, Washington, DC
Request for Advance Notification of All Public Environmental Review
Meetings
Request for Consulting Party Status in Section 106 Review

Dear Mr. Lawson:

The Capitol Hill Restoration Society (CHRS) has a substantial interest in the planning process for improving and expanding the Virginia Avenue Tunnel, which will span the Capitol Hill community and bisect the Capitol Hill Historic District. The tunnel also lies fully within L'Enfant's Plan for the City of Washington, which is listed in the National Register of Historic Places. Several members of the CHRS Board have met with CSX representatives about the project, and many CHRS members received letters from CSX in early June that described the need for CSX to coordinate construction with other projects in the vicinity and affirmed CSX's intent to work closely with the community as project planning and implementation move forward.

CHRS appreciates the efforts CSX has undertaken to inform the community, including CHRS, about its project, as well as CSX's commitment to involve the community in the project's planning and review processes. We look forward to engaging with CSX, FHWA, other involved agencies, and others in the Capitol Hill community as CSX, FHWA, and DDOT embark on the environmental review and analysis required by the National Environmental Policy Act (NEPA). To that end, CHRS asks to be notified in advance of all public meetings that are conducted for environmental review purposes and to be invited in writing to submit comments at appropriate points in the EIS process (for instance, scoping, DEIS, FEIS, etc.).

Because the project will bisect the Capitol Hill Historic District (CHHD) and has the potential to affect contributing historic properties, CHRS assumes that the project will also require historic preservation review under Section 106 of the

National Historic Preservation Act. The Section 106 regulations at 36 CFR Part 800 provide for "...organizations with a demonstrated interest in the undertaking [to] participate as consulting parties due to the nature of their...concern with the undertaking's effects on historic properties" [§ 800.2(c)(5)].

Accordingly, CHRS requests Consulting Party status in this Section 106 review per § 800.3(f)(3). As the oldest and largest civic organization on Capitol Hill and one of the largest in Washington, DC, CHRS is committed to preserving the historic fabric of Capitol Hill and protecting its architectural, historic, and residential character. Indeed, CHRS played an important role in nominating the CHHD to the National Register of Historic Places and also submitted a later nomination to expand the CHHD to include the portion south of the freeway that is bordered by M, 7th and 10th Streets, SE, for the purpose of protecting the area's historic character. We also have great interest in the historic L'Enfant Plan, which extends beyond the historic district to embrace additional neighborhoods in the Capitol Hill area, including those in the project vicinity outside the CHHD boundaries.

CHRS has many concerns about the potential for this project to affect the CHHD, including risks not only to nearby historic parks, but also to the structural integrity of many dozens of contributing historic buildings. Virginia Avenue Park, for instance, is a contributing historic property in both the CHHD and the L'Enfant Plan for the City of Washington, and CHRS was quite concerned to hear that CSX was expecting to use the park for construction staging, leading us to fear for other nearby historic properties as well. Since the potential for both direct and indirect effects on historic resources – as well as measures to avoid, minimize, and mitigate adverse effects – will be considered during Section 106 review of this tunnel project, CHRS wants to participate in that process as a Consulting Party.

We look forward to receiving your response to our requests.

Sincerely,

Elizabeth Purcell
President

Cc: Michael Hicks, Environmental/Urban Engineer, FHWA
David Maloney, State Historic Preservation Officer, DC Historic Preservation Office
C. Andrew Lewis, Senior Preservation Specialist, DC Historic Preservation Office
Reid Nelson, Director, Office of Federal Agency Programs, Advisory Council on Historic Preservation
Carol Legard, FHWA Liaison, Advisory Council on Historic Preservation
Steve Whitesell, Regional Director, National Capital Region, National Park Service

Faisal Hameed, Chief, Project Development, Environment and
Sustainability Planning, DDOT
Chip Dobson, Director of Strategic Infrastructure Initiatives, CSX
Stephen Flippin, Director of Federal Affairs, CSX
David W. Levy, Director, Urban Design and Plan Review, National Capital
Planning Commission
Thomas Luebke, Secretary, Commission of Fine Art