



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 -- National Capital Area
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

September 18, 2020

David Maloney
State Historic Preservation Officer
Attn: Andrew Lewis and Ruth Troccoli
DC Historic Preservation Office
Office of Planning
1100 4th Street SW, Suite E650
Washington, DC 20024

Subject: Initiation of Section 106, Fort Reno Trail Improvements, Fort Reno Park,
U.S. Reservation 470 – Seeking Review and Concurrence to Finding of “No
Adverse Effect”

Dear Mr. Maloney:

The National Park Service (NPS) is requesting to formally initiate Section 106 consultation with the DC Historic Preservation Office regarding a proposal to improve the existing trail at Fort Reno Park (U.S. Reservation 470), between Chesapeake Street NW and Fort Drive NW. The park is under the administration of Rock Creek Park, a unit of the NPS, as part of the Civil War Defenses of Washington. As such, we seek your review and comment on the proposed undertaking.

The trail at Fort Reno Park is a connecting route used by students of nearby Alice Deal Middle School and Woodrow Wilson High School, as well as many park users. The trail also provides access to various park amenities, such as recreation fields, tennis courts, and a performance stage. While this is not a formal trail, the NPS has previously improved the surface for safety reasons. Currently, the trail consists of a dirt path topped with crushed stone aggregate. During periods of wet weather, the trail gets muddy and collects water. There have been several public complaints about the condition of the trail. By formalizing and paving the surface of the trail, the park will also be able to better maintain the trail and to clear snow and ice during the winter.

The proposed improvements are intended to correct deficiencies, improve maintenance, and enhance safety along the trail. Specifically, the park will construct a new paved trail, approximately 700 feet in length by eight feet wide, following the footprint of the existing hard packed crushed stone trail. The park is pursuing full-depth reconstruction and would remove the

top three inches of existing crushed stone (RC-6) trail surface and replace with a new aggregate crushed stone base and upper permeable pavement surface layer (i.e., porous asphalt). The surface layer would be three inches thick and the base six inches thick (minimum) for the length of the trail, which would flare to 12 feet wide at either end as it intersects with existing roadways and sidewalks. The trail will slope longitudinally no more than five percent, and the intent is to follow the existing grade and open areas as much as possible. A four-inch PVC underdrain will be installed beneath the permeable surface to discharge stormwater to two new outfalls that are to be constructed east of the trail. Other improvements include adding 12 new light poles to illuminate the trail. Please find enclosed a copy of the 90 percent design plans for your review.

In accordance with Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA) (54 U.S.C. § 306108), and the Advisory Council on Historic Preservation's regulations (36 CFR Part 800), the NPS has considered the effects of this undertaking to historic properties, prepared an Assessment of Effect document, and applied the Criteria of Adverse Effect, as defined in 36 CFR Part 800.5, to historic properties within the Area of Potential Effects (APE).

The APE for this proposed undertaking consists of approximately 0.55 acres of Fort Reno Park, located in Washington, DC. The limits of disturbance (LOD) for the trail improvement project roughly measure 700 feet long by eight feet wide by two feet deep. Please find enclosed a map depicting the proposed APE for your review.

The project's APE falls within the boundary of the Civil War Defenses of Washington (CWDW) Historic District, which is listed in the National Register of Historic Places (#74000274, #78003439). The 1,524-acre historic district encompasses land associated with the Civil War Defenses of Washington, as well as the development of the Fort Circle Parks and proposed Fort Drive, located primarily in the District of Columbia, with some sections situated in Prince George's County, Maryland, and in Fairfax County and Arlington County, Virginia. The district generally comprises a string of contiguous and discontinuous parkland situated along a ridge that encircles downtown Washington, DC, forming a partial ring of green space around the city. The historic district is significant under National Register criteria A, D, and D in the following areas: military, engineering, ethnic heritage, community planning and development; and archeology. The period of significance for the historic district is 1861 to 1972. Fort Reno Park, originally known as Fort Pennsylvania, was included in the historic district as part of a 2015 boundary increase. Although no Civil War fortifications exist on site today, the area was included in planning efforts for Fort Drive.

Additionally, Fort Reno Park is the site of the non-extant Reno City, a predominantly African American working-class neighborhood that developed at the close of the Civil War. The community was relatively self-sustaining and featured African American businesses, such as a grocery store, as well as churches and a school. At its height, the neighborhood contained almost 100 buildings. In the early twentieth century, city planning efforts identified Reno City as an area suitable for public parkland and Fort Drive. Additionally, the DC and Federal government agencies decided to make use of the land for other civic improvements, such as construction of two new schools and a reservoir system. Over time, the residents of Reno City were eventually forced from their homes and the neighborhood demolished. Archeological investigations have identified artifacts and features relating to Reno City deeply buried under several feet of fill soils.

The resulting archeological site (51NW074) was determined eligible for listing in the National Register, as it has potential to yield significant information about Reno City.

NPS cultural resource professionals have recommended the current proposal as being the most compatible and least impactful to the historic characteristics of the CWDW Historic District that qualify it for inclusion in the National Register of Historic Places. While there will be an effect to the historic property as a result of the trail improvement project, it does not rise to the level of adverse effect. The improved trail will occupy the same footprint as the existing trail, thus preserving and maintaining current circulation patterns. Installation of the light poles will also have an effect, but one that is ultimately beneficial, as it will increase illumination and enhance safety conditions. Only a limited number of new trees are included in the landscaping plan, as required by the District Department of Energy and Environment; these have been placed in areas that are not archeological sensitive. Also, no trees will be placed in or around the performance stage area to maintain existing sight lines and the open character of the park. Please see the enclosed Assessment of Effects form for additional information.

Ground disturbance on NPS land is required to improve the trail, construct the two outfalls, and install the twelve light poles. Given the presence of the National Register-eligible Reno City and potential impacts that could result from the project, the National Park Service contracted for a Phase I/II archeological investigation within the project area. Archeologists from WSP USA Inc. conducted the survey in 2019 and confirmed that there are still intact and significant archeological remains present within the APE related to Reno City. A draft copy of the subsequent report (DC SHPO Report #816) was shared with the DC Archeologist, Dr. Ruth Troccoli, for review and comment in June 2020. Following the discovery and interpretation of the finds, the design of the trail was altered to avoid impacts to areas where archeological materials and features are known to exist, thereby avoiding any direct adverse effects. For example, the southern portion of the trail lacks an underdrain to reduce vertical ground disturbance and avoid impacts to archeological resources in that area. Additionally, trenchless perimeter erosion controls, such as filter socks, will be used to reduce ground disturbance that could impact trees and archeology.

The NPS has determined the Fort Reno Trail Improvements project will have “No Adverse Effects” to historic properties or archeological resources. We trust you will concur with this determination and look forward to your response. Should you have any questions regarding this correspondence, please contact Bradley Krueger, Cultural Resources Program Manager, at 202-895-6067 or bradley_krueger@nps.gov.

Thank you for your continued assistance.

Sincerely,

JULIA WASHBURN
Digitally signed by JULIA
WASHBURN
Date: 2020.09.18 12:05:54 -04'00'

Julia Washburn

Superintendent

Enclosures: Assessment of Effects form, APE Map, 90% design plans