

**PROGRAMMATIC AGREEMENT
AMONG
THE FEDERAL TRANSIT ADMINISTRATION
THE WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY
AND
THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER
REGARDING
THE BLADENSBURG BUS DIVISION
ARCHAEOLOGICAL INVESTIGATION**

WHEREAS, the Federal Transit Administration (FTA) will provide financial assistance to the Washington Metropolitan Area Transit Authority (WMATA) for the demolition of three buildings and parking lots at 2551 26th Street, NE in Washington, DC and to construct a new building that consolidates bus maintenance and repair functions for WMATA’s Bladensburg Bus Division (Project); and

WHEREAS, FTA’s provision of funds constitutes an undertaking subjecting the Project to review under Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. § 300100 *et seq.*, and its implementing regulations (36 C.F.R. § 800) (collectively referred to as Section 106) so FTA will serve as the Lead Federal Agency; and

WHEREAS, WMATA is proposing a three-phase approach to the Project, with Phase 1 consisting of demolition and new facility construction on the southwest portion of the existing facility (Exhibits A and B); Phase 2 consisting of demolition and construction of the northern portion of the new facility (Exhibits C and D); and Phase 3 consisting of the demolition and construction of the remainder of the new facility (Exhibits E and F); and

WHEREAS, FTA and WMATA formally initiated Section 106 consultation with the District of Columbia State Historic Preservation Office (DC SHPO) on May 8, 2019; determined the Area of Potential Effects (APE); notified potential consulting parties and received no responses; and

WHEREAS, FTA determined in consultation with WMATA and DC SHPO that while no historic built environment resources would be affected by the undertaking, archaeological identification survey has not occurred in the project area and that there is potential for the undertaking to adversely affect yet-identified archaeological resources since the Project site contains an archaeological Area of Interest (AOI) (Exhibit G) potentially related to the 1862 Clark Mills Foundry where the statue called “Freedom,” which tops the Capital Building dome was cast, and this area is inaccessible for archaeological survey until Phase 2 of the Project; and

WHEREAS, FTA, WMATA, and DC SHPO determined that the effects on historic properties cannot be fully determined prior to approval of the undertaking and that the most efficient way to comply with Section 106 was to develop this Programmatic Agreement (PA) pursuant to 36 C.F.R. § 800.14(b) to ensure that a phased archaeological investigation survey can be conducted within the AOI prior to Phase 2 demolition; and

WHEREAS, FTA notified the Advisory Council on Historic Preservation (ACHP) on September 17, 2019 of its intent to develop the PA to ensure that a phased archaeological investigation survey is completed prior to the Phase 2 demolition, and the ACHP declined to participate in a letter of October 1, 2019; and

WHEREAS, this PA was developed with appropriate public involvement pursuant to 36 C.F.R. § 800.14(b)(2)(ii), and WMATA, in coordination with FTA, has taken steps to involve the individuals, organizations and entities likely to be interested, such as District of Columbia Ward 5 Councilmember Kenyan R. McDuffie on January 7, 2019, Advisory Neighborhood Commission 5C on February 27, 2019, and the Arboretum Civic Association on March 12, 2019. In addition, formal Section 106 notification letters were sent to these parties and the DC Preservation League on March 18, 2019; and

WHEREAS, FTA, WMATA, and DC SHPO are the Signatories to this PA;

NOW, THEREFORE, FTA, WMATA, and DC SHPO agree that the undertaking shall be implemented in accordance with the following stipulations to consider its effect on historic properties.

STIPULATIONS

FTA will ensure that the following measures are carried out by WMATA:

I. Purpose and Applicability

This PA sets forth the process by which the FTA, in coordination with WMATA, shall meet its responsibilities under Section 106 for good faith identification and treatment of archaeological resources within the AOI of the Project and establishes how FTA, WMATA, and the DC SHPO will be involved.

II. Responsibilities of the FTA, WMATA, and the DC SHPO

In compliance with its responsibilities under Section 106, and as a condition of its award of any federal assistance, FTA shall ensure that WMATA carries out the requirements of 36 C.F.R. § 800, and applicable ACHP standards and guidelines for the Project. FTA and the DC SHPO will participate in the process as specified in subsequent stipulations. FTA shall ensure that no ground disturbing activities will commence in the AOI until the phased archaeological investigation survey has been conducted and the Signatories have concurred that the undertaking will not adversely affect eligible resources, or until any unavoidable adverse effects have been mitigated. DC SHPO shall complete all reviews within a thirty-day (30) period.

III. Guidelines, Standards and Regulations

Guidelines, standards and regulations relevant to this PA and its purposes include:

- *Secretary of the Interior's (SOI) Standards and Guidelines for Archeology and Historic Preservation* (1983) (36 C.F.R. § 61)
- *Guidelines for Archaeological Investigations in the District of Columbia* (1998 – with revisions 2007 and 2018, prepared by District of Columbia Preservation League in association with Greenhorne & O'Mara, Inc., Woodward-Clyde Federal Services, Inc. (hereinafter *DC Guidelines*))
- *36 C.F.R. § 800: Protection of Historic Properties* (2004)
- *Section 106 Archaeology Guidance* (ACHP, 2009)
- *Recommended Approach for Consultation on Recovery of Significant Information from Archeological Sites* (ACHP, 1999)
- *Basic Principles The Treatment of Archaeological Sites* (DC SHPO)
- *Register of Professional Archaeologists, The Register's Code and Standards* (hereinafter *RPA*)

IV. Use of Qualified Professionals

Archaeological investigations shall be conducted by qualified professional archaeologists that meet the *Secretary of the Interior's Professional Qualification Standards* (36 C.F.R. § 61, Appendix A), and principal investigators must meet the minimum standards for Registered Professional Archaeologist (RPA) qualification.

V. Identification of Archaeological Resources:

Phased archaeological investigations are required to identify archaeological resources within the AOI and evaluate them for National Register of Historic Places (National Register) eligibility. All aspects of these investigations shall comply with the *DC Guidelines* and current DC SHPO checklists and guidance. No ground-disturbing activities associated with the Project shall commence in the AOI until the DC SHPO concurs with the results of the investigations and explicitly approves such activities.

A. Phase I Identification of Archaeological Resources

WMATA, in coordination with FTA, developed a work plan for identification and evaluation of resources based on Exhibit H, Archaeological Survey and Assessment Work Plan, that was submitted to the DC SHPO for review and approval. The investigations shall employ a mixture of mechanical trenching and manual excavation according to the work plan to locate, expose, define the boundaries of, and document any archaeological resources within the AOI.

B. Phase II Evaluation and Assessment of Effect

If any archaeological resources are identified, FTA and WMATA shall consult with DC SHPO to determine whether Phase II archaeological investigations are necessary to evaluate the National Register eligibility and integrity of the resources. A Work Plan addendum will be submitted to the DC SHPO for review and approval before additional

investigations may proceed. If the resources are determined eligible, FTA and WMATA shall make a reasonable effort to avoid or minimize adverse effects to them. If adverse effects to eligible resources cannot be avoided, FTA shall develop a Phase III data recovery and/or alternative mitigation plan in consultation with the DC SHPO and in accordance with Stipulation VII.

C. Laboratory Work and Curation:

All artifacts will be cleaned, processed, analyzed, and prepared for permanent curation in accordance with the *DC Guidelines*. The collections, collections database, artifact and field photos, field notes, records, digital data, and Geographic Information System (GIS) data, will be prepared for permanent curation following the *DC Guidelines* and related submission guidance and checklists and transmitted to the DC SHPO within 30 days of submitting the revised, final technical archaeological report to the DC SHPO.

D. Reporting Requirements – Draft and Final Technical Reports

1. A single, comprehensive technical report covering all phases of investigations will be prepared in accordance with the *DC Guidelines* with a draft version submitted for DC SHPO review and comment prior to completion of a final revised version. State archaeological site form(s) and Determination of Eligibility form(s) will be prepared if resources are identified, and/or as specified by the DC SHPO. The DC SHPO shall be provided one hard-copy, and a PDF of the draft technical report for review. Upon acceptance of the final, revised report, two hard copies and an electronic PDF copy will be placed on file with the DC SHPO, and FTA and WMATA shall ensure that an additional hard copy is sent to each repository specified in the *DC Guidelines*, with additional copies to other signatories as their regulations require.
2. FTA and WMATA may elect to use the FastTrack process identified in the *DC Guidelines* (see page 12), to shorten the review timeline between phases of the investigations. Following completion of the Phase I and/or Phase II archaeological investigations a brief draft Management Summary of the project results may be submitted containing sufficient data and illustrations of the methods, results, and recommendations for the DC SHPO to make a determination of effect. Once the DC SHPO is satisfied with the (revised) Management Summary, the DC SHPO may, if warranted, provide Conditional Approval that specifically approves Project construction activities in the AOI to proceed before the comprehensive technical report and related collections and data management tasks are completed.

VI. Treatment of Eligible Resources

The type of archaeological resources present will determine the treatment to mitigate adverse effects on eligible resources. The type of mitigation, such as data recovery and/or an alternative treatment option, will be determined in consultation with the DC SHPO following which a work plan will be prepared for DC SHPO review and approval. Data recovery may be inappropriate

for some types of archaeological resources, including architectural remains with few associated artifacts or related archaeological features such as might be expected if Clark Mills Foundry remains are identified.

A. **Alternative treatment options:** If Phase III data recovery investigation is not selected as a treatment, suggested alternative treatment options may include, but are not necessarily limited to:

1. Preparation of public outreach and educational materials such as brochures, posters, signage, GIS story map; and public sharing of these materials such as at the DC History Conference and by sharing the data generated by the project via a website or through other media; and/or
2. The Historic American Engineering Record (HAER) or the Historic American Buildings Survey (HABS) level documentation of architectural data with emphasis on Clark Mills' innovative founding methods; and/or
3. Conducting detailed research on Clark Mills, his founding techniques, and the construction engineering of the foundry and/or his associated business that contribute to the significance of the data and to the historic context of the eligible resources; and/or
4. Other treatments that cannot be anticipated at this time since the type of resources present are unknown.

B. **Phase III Data Recovery:** If Data Recovery is selected as a treatment, investigations shall be conducted following a DC SHPO-approved work plan, shall follow *DC Guidelines*, and shall be carried out in accordance with the reporting and lab/curation standards outlined in Stipulations V.C., and V.D *supra*. Data recovery efforts will be planned to salvage data significant to history or prehistory related to the National Register significance established in Stipulation V.B. *supra*, in accordance with *Recommended Approach for Consultation on Recovery of Significant Information from Archeological Sites (ACHP, 1999)*, *Basic Principles The Treatment of Archaeological Sites (DC SHPO)*, and other pertinent guidance.

C. The DC SHPO must be notified of completion of treatments applied directly to any archaeological resources in the AOI, so that the AOI can be released for the commencement of construction and the approval of permit applications. Use of the Fast Track notification process via submission of a management summary is recommended while the full technical report and/or other documentation materials are being completed, in accordance with Stipulation V.D.2. *supra*.

VII. Post-Review Discoveries

A. Unanticipated Archaeological Discoveries

1. In the event that a previously unidentified archaeological resource(s) is discovered in the APE, including outside the AOI, during ground disturbing activities, all construction work involving subsurface disturbance shall be halted in the area of the resource and in the surrounding area where further subsurface remains can reasonably be expected to occur.
2. The DC SHPO shall be notified in writing via email, and by telephone immediately upon discovery of a previously unidentified archaeological resource. The DC SHPO or a representative shall visit the site within forty-eight (48) hours of such notification, excluding weekends and Federal holidays. The DC SHPO shall inspect the work site and determine the area and the nature of the affected archaeological resource(s). Construction work may then continue in the project area, but outside the archaeological resource(s) area, after the boundaries of the resource(s) or archaeological site have been determined.
3. Within ten (10) working days of the original notification of discovery, FTA and WMATA, in consultation with DC SHPO, shall determine the National Register eligibility of the archaeological resource(s) and a proposed plan of action determined.
4. If the resource is determined to meet National Register eligibility criteria (36 C.F.R. § 60.6), FTA and WMATA, in consultation with DC SHPO, shall ensure compliance with 36 C.F.R. § 800.13. Work in the archaeological resource(s) area shall not proceed until either: (a) the development and implementation of an appropriate recovery or other recommended mitigation treatment plan consistent with Stipulation VII. herein (Treatment of Eligible Resources); or (b) the determination is made that the located remains are not eligible for inclusion on the National Register.
5. FTA shall ensure that all materials and records resulting from data recovery are reported and curated consistent with Stipulation V.C. *supra*, preferably as an appendix to the Archaeological Identification report outlined in Stipulation V.D., if practicable.

B. Treatment of Human Remains

Should human remains, burials, or funerary objects be discovered during construction of the Project or any action taken pursuant to this PA be encountered during the undertaking:

1. WMATA, in coordination with FTA, shall immediately halt subsurface, ground disturbing activities in the area of the discovery and in the surrounding area where additional remains can reasonably be expected to occur, implement measures to protect the human remains from inclement weather and vandalism, and immediately notify FTA, the DC SHPO, the District of Columbia Office of the Chief Medical Examiner (“OCME”) and Forensic Anthropologist of the discovery. Sufficient description of the discovery shall be provided to allow OCME to complete its

obligations under Section 5-1406 of the Code of the District of Columbia, or other applicable law(s).

2. If the OCME determines that the human remains are not subject to a criminal investigation by local or federal authorities, FTA and WMATA shall determine appropriate disposition in consultation with the DC SHPO. FTA and WMATA shall comply with all applicable federal and District of Columbia laws and regulations governing the discovery and disposition of human remains, and consider ACHP's 2007 *Policy Statement Regarding Treatment of Burial Sites, Human Remains, and Funerary Objects* (Feb. 23, 2007), available at: <https://www.achp.gov/digital-library-section-106-landing/achp-policy-statement-regarding-treatment-burial-sites-human>
3. If the human remains or burials are potentially Native American then FTA shall follow agency guidance on the Native American Graves and Repatriation Act of 1990 (P.L. 101-601) (NAGPRA), and notify, within 48 hours of the discovery, any federally recognized Tribes and Nations that may attach religious and/or cultural significance to the affected property. The DC SHPO shall be consulted to determine a treatment plan for the avoidance, recovery or reburial of the remains in accordance with procedures guidelines outlined in Stipulations VI. and VII. herein.

VIII. Duration

Unless amended or terminated in accordance with Stipulation XI. (Amendments) or Stipulation XII (Termination), this PA will remain in effect for four (4) years from the date of its execution, or until FTA determines that it has been satisfactorily fulfilled. WMATA will notify FTA when the Project is completed and there are no further opportunities for unanticipated discoveries described in Stipulation VII. FTA will notify the Signatories by e-mail when it determines that Stipulations are completed, thereby fulfilling the terms of this PA.

IX. Monitoring and Reporting

Following execution of this PA, until it expires, is completed, or is terminated, FTA shall, in coordination with WMATA, provide all Signatories to this PA annual summary reports detailing work undertaken pursuant to its terms, and a final report. Such report may be submitted via email and shall include any scheduling changes proposed, and problems encountered, and any disputes and objections received in FTA's efforts to carry out the terms of this PA.

X. Dispute Resolution

Should any Signatory to this PA object at any time to any actions proposed or the manner in which the terms of this PA are implemented. FTA shall consult with such party to resolve the objection.

If FTA determines that such objection cannot be resolved, FTA will forward all documentation relevant to the dispute, including FTA's proposed resolution, to ACHP who shall provide FTA

with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, FTA shall prepare a written response that considers any timely advice or comments regarding the dispute from the ACHP and Signatories and provide them with a copy of this written response. FTA will then proceed with its final decisions.

If ACHP does not provide its advice regarding the dispute within the thirty (30) day period, FTA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, FTA shall prepare a written response that considers any comments timely submitted regarding the dispute from the Signatories to the PA, and provide commenters and ACHP with a copy of such written response.

FTA's responsibilities to carry out all other actions subject to the terms of this PA that are not the subject of a dispute would remain unchanged.

XI. Amendments

This PA may be amended when such an amendment is agreed to in writing by all Signatories. The amendment will be effective on the date a copy signed by all the Signatories is filed with ACHP.

XII. Termination

If any Signatory to this PA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment under Stipulation XI. (Amendments) herein. If within thirty (30) days (or another period agreed to by all Signatories) an amendment cannot be reached, any Signatory may terminate the PA upon written notification to the other Signatories. In the event of termination FTA will comply with 36 C.F.R. § 800 and/or execute a new agreement document.

XIII. Electronic Copies

Within one (1) week of the last signature on this PA, WMATA shall provide each Signatory with one high quality, legible, full color, electronic copy of this fully-executed PA, with all attachments fully integrated into one, single document. Internet links shall not be used to provide copies of attachments since links to web-based information often change. If the electronic copy is too large to send by e-mail, WMATA shall provide each Signatory with a copy of this PA as described above, on a compact disc or other suitable, electronic means.

Execution of this PA and implementation of its terms evidence that FTA has considered the effects of this undertaking on historic properties and afforded ACHP a reasonable opportunity to comment.

EXHIBITS

- Exhibit A: Phase I Demolition Site Plan
- Exhibit B: Phase I Construction Site Plan
- Exhibit C: Phase II Demolition Site Plan
- Exhibit D: Phase II Construction Site Plan
- Exhibit E: Phase III Demolition Site Plan
- Exhibit F: Phase III Construction Site Plan
- Exhibit G: Area of Interest
- Exhibit H: Archeological Survey and Assessment Work Plan

SIGNATURES FOLLOW ON SEPARATE PAGES

SIGNATURE PAGE
PROGRAMMATIC AGREEMENT
REGARDING
THE BLADENSBURG BUS DIVISION
ARCHAEOLOGICAL INVESTIGATION

FOR THE FEDERAL TRANSIT ADMINISTRATION

By: Terry Garcia Crews

Terry Garcia Crews
Regional Administrator

Date: 1-21-2020

**SIGNATURE PAGE
PROGRAMMATIC AGREEMENT
REGARDING
THE BLADENSBURG BUS DIVISION
ARCHAEOLOGICAL INVESTIGATION**

FOR THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER

By: _____



David Maloney
State Historic Preservation Officer, District of Columbia

Date: _____

1/16/2020

**SIGNATURE PAGE
PROGRAMMATIC AGREEMENT
REGARDING
THE BLADENSBURG BUS DIVISION
ARCHAEOLOGICAL INVESTIGATION**

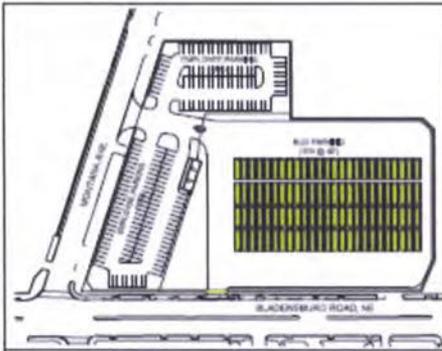
FOR THE WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY

By:  17-Jan-2020 _____

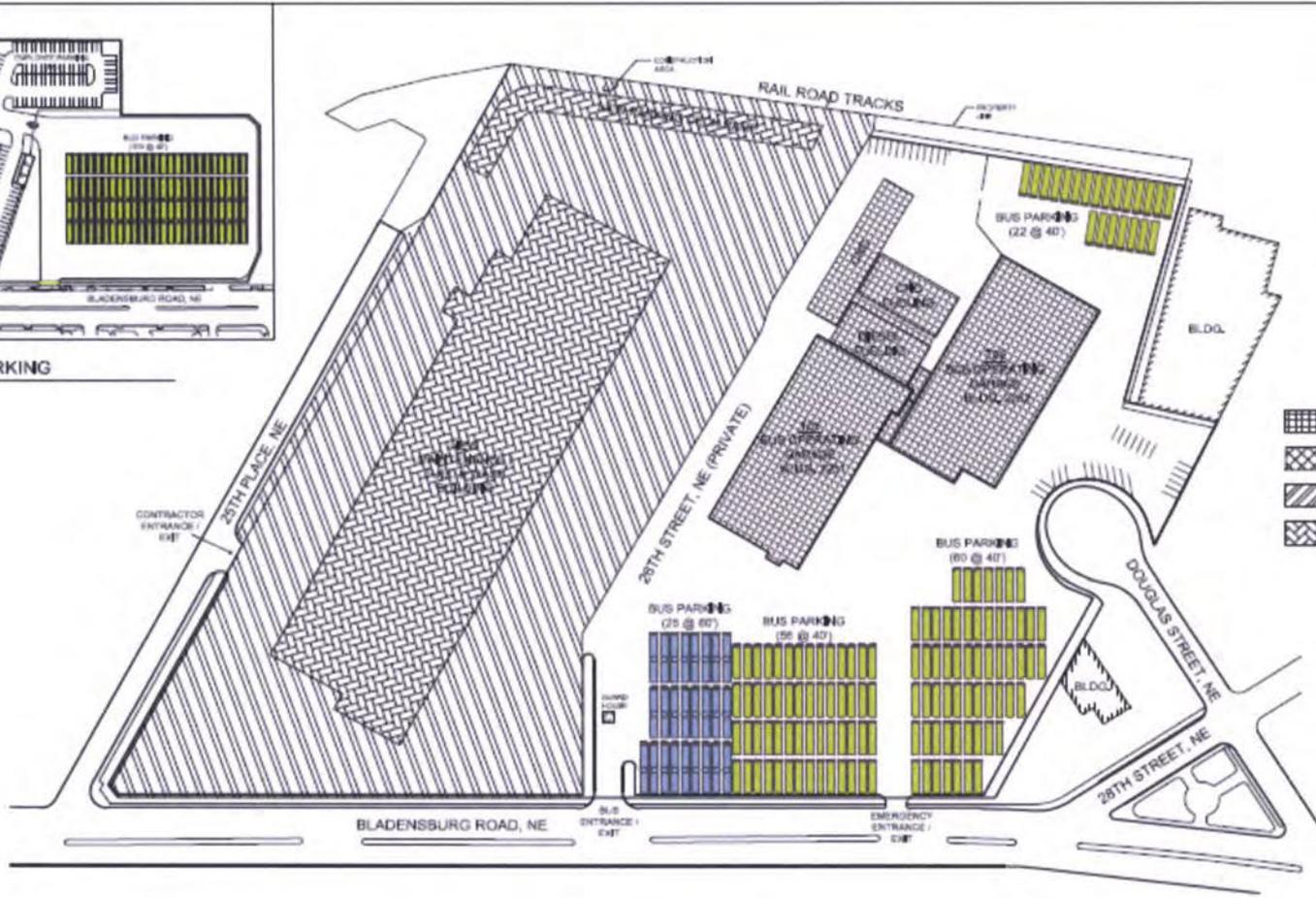
Laura Mason
Executive Vice President, Capital Delivery

EXHIBIT A
PHASE I DEMOLITION SITE PLAN

EXHIBIT B
PHASE I CONSTRUCTION SITE PLAN



OFF-SITE PARKING
N75



PARKING COUNT	
40' Four Bus	194
60' Six Bus	180
40' Six Bus	24
40' Six Bus	187

- EXISTING STRUCTURES
- DEMOLITION OF STRUCTURES
- CONSTRUCTION AREA
- NEW CONSTRUCTION



10/18/2011 10:00 AM
 W:\Projects\2011\Bladensburg\Drawings\Phase I Construction Site Plan.dwg
 10/18/2011 10:00 AM
 W:\Projects\2011\Bladensburg\Drawings\Phase I Construction Site Plan.dwg

NO.	DATE	DESCRIPTION	BY	CHKD

WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY
 DEPARTMENT OF TRANSIT INFRASTRUCTURE AND ENGINEERING SERVICES
 OFFICE OF THE CHIEF ENGINEER, INFRASTRUCTURE

VOLUME 3, 1.1 BLADENSBURG GENERAL PLANS
 PHASE I CONSTRUCTION SITE PLAN
 SHEET NO. 4 of 24

EXHIBIT C
PHASE II DEMOLITION SITE PLAN

EXHIBIT D
PHASE II CONSTRUCTION SITE PLAN

EXHIBIT E
PHASE III DEMOLITION SITE PLAN

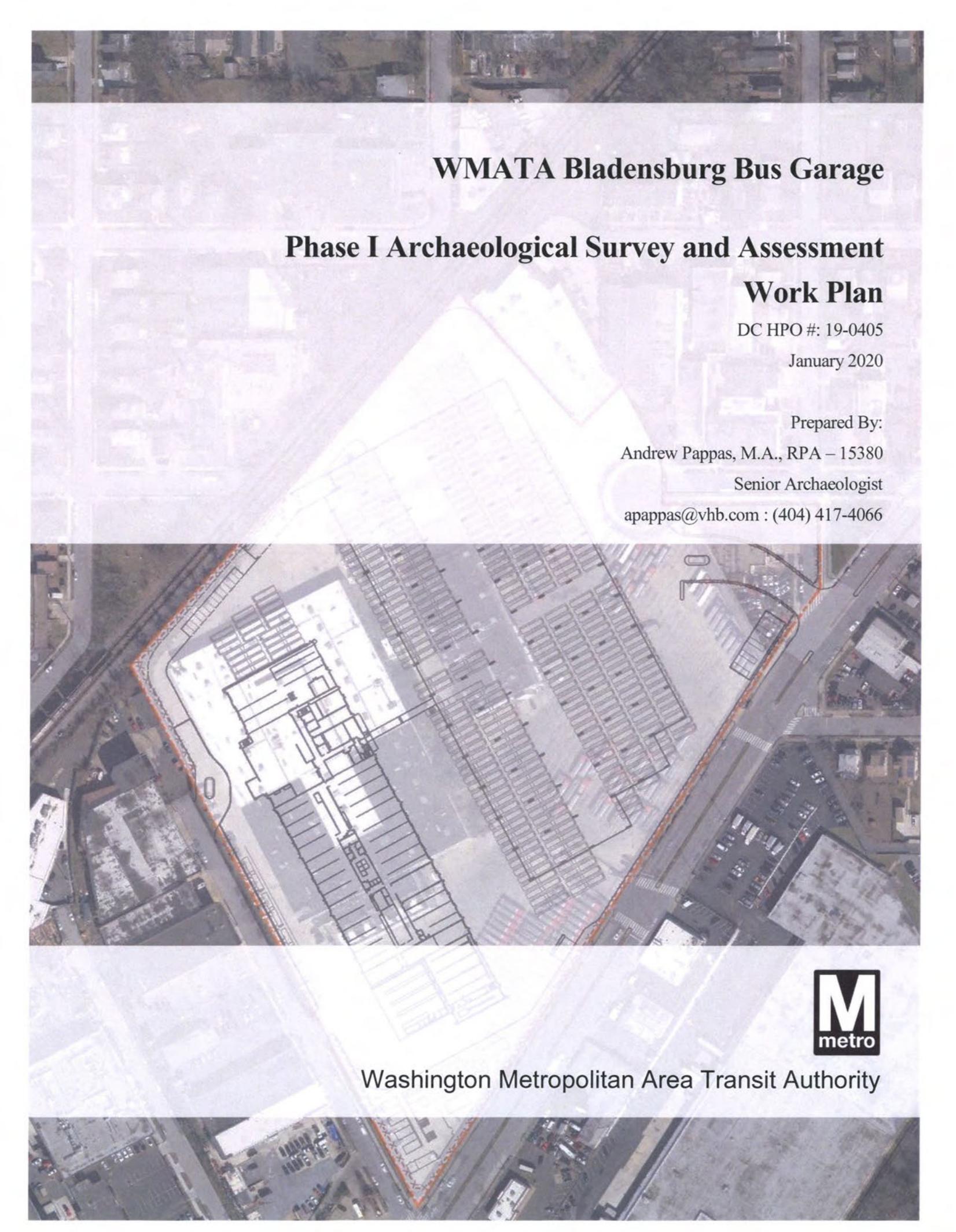
EXHIBIT F
PHASE III CONSTRUCTION SITE PLAN

EXHIBIT G
AREA OF INTEREST



**Bladensburg Bus Division
Archaeological Area of Interest** ———

EXHIBIT H
ARCHAEOLOGICAL WORK PLAN



WMATA Bladensburg Bus Garage

Phase I Archaeological Survey and Assessment

Work Plan

DC HPO #: 19-0405

January 2020

Prepared By:

Andrew Pappas, M.A., RPA – 15380

Senior Archaeologist

apappas@vhb.com : (404) 417-4066



Washington Metropolitan Area Transit Authority

(This Page Intentionally Left Blank)

Contract FQ15190
Task Order No: CIP-19-FQ15190-ENGA-001

WMATA Bladensburg Bus Garage

Phase I Archaeological Survey and Assessment **Work Plan**

January 2020



Washington Metropolitan Area Transit Authority

(This Page Intentionally Left Blank)

WMATA Bladensburg Bus Garage

Phase I Archaeological Survey and Assessment

Work Plan

DC HPO #: 19-0405

January 2020

Prepared By:

Andrew Pappas, M.A., RPA – 15380

Senior Archaeologist

apappas@vhb.com : (404) 417-4066



Washington Metropolitan Area Transit Authority

(This Page Intentionally Left Blank)

Contract FQ15190
Task Order No: CIP-19-FQ15190-ENGA-001

WMATA Bladensburg Bus Garage

Phase I Archaeological Survey and Assessment **Draft Work Plan**

January 2020



Washington Metropolitan Area Transit Authority

(This Page Intentionally Left Blank)

Table of Contents

1	Introduction.....	1
2	Proposed Project Undertaking and Anticipated Redevelopment Phases.....	4
3	Archaeological Background of the APE and AOI.....	5
3.1	Archaeological Site Potential Within the APE.....	6
3.2	Research Design.....	11
4	Proposed AOI Survey Methodology.....	11
4.1	Field Survey.....	12
4.2	Artifact Collection.....	14
5	Technical Report Preparation.....	15
6	Mitigations and Alternative Treatment Options.....	16
6.1	Alternative Treatment Options.....	16
7	References Cited.....	16

LIST OF FIGURES

Figure 1:	USGS Map Showing the Location of the Bladensburg Bus Division Property.....	2
Figure 2:	Current Aerial Detail Showing the APE and AOI.....	3
Figure 3:	Topographic Map, District of Columbia (Bosche 1861; WMATA 2019).	6
Figure 4:	1888 U.S. Coast and Geodetic Map Showing Location of the Octagonal Structure (Red Arrow).	7
Figure 5:	1951 Historic Aerial Photograph of Archaeological APE.....	8
Figure 6:	1951 Historic Aerial Photograph with Inset Showing General Area of Foundations.....	9
Figure 7:	1951 Historic Aerial Photograph with Inset Showing Georeferenced Archaeological AOI and Foundations.....	10
Figure 8:	Proposed Machine-Assisted Trench Locations Within the AOI.	13

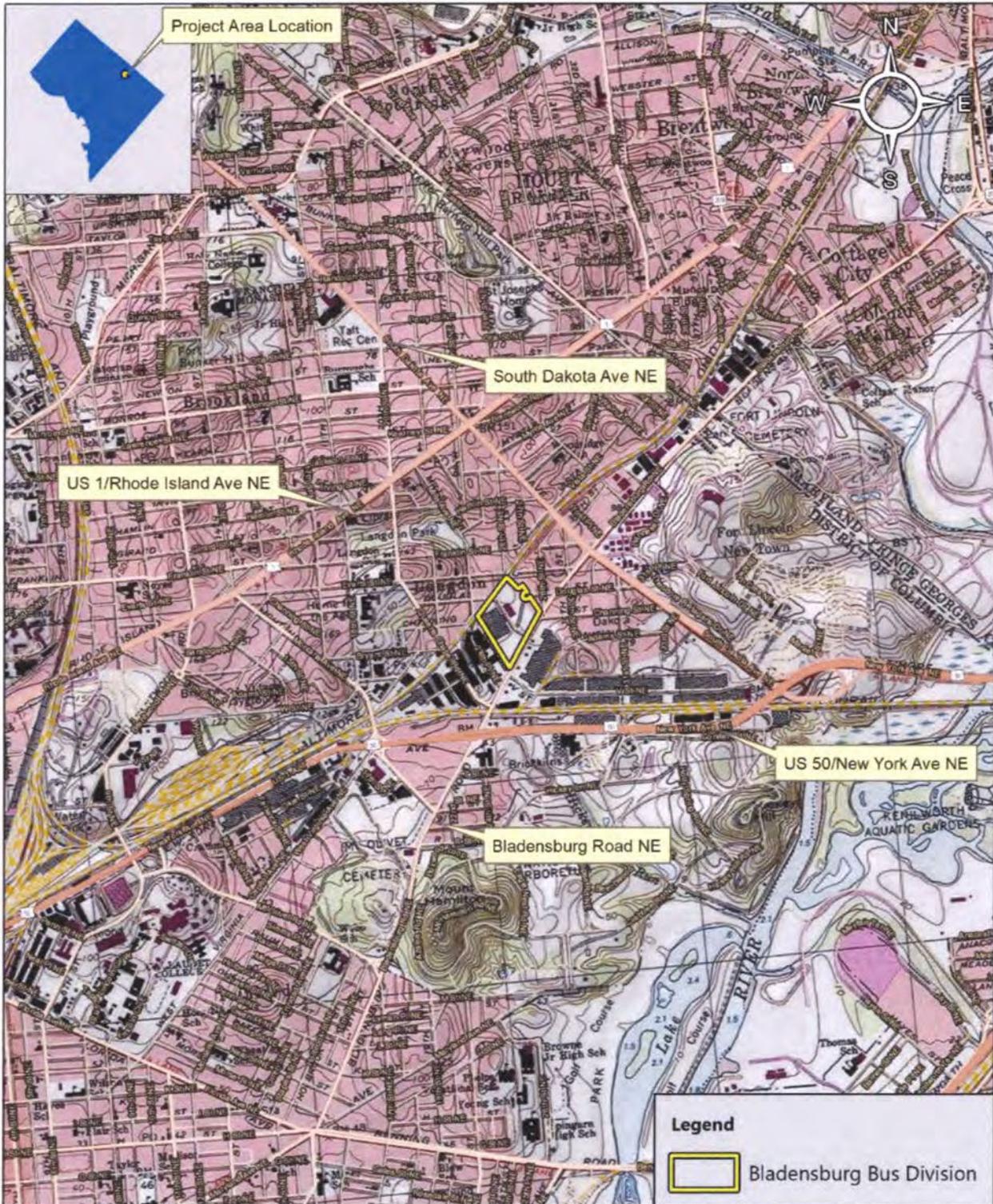
1 INTRODUCTION

The Washington Metropolitan Area Transit Authority (WMATA), through financial assistance from the Federal Transit Administration (FTA), proposes to develop an approximately 18.5-acre parcel located at 2251 26th Street NE, Washington, D.C. (Figure 1). The proposed undertaking will involve the demolition of three existing structures and associated parking lots which comprise WMATA's Bladensburg Bus Division. Preliminary background research has indicated the high potential for intact, buried, and potentially significant archaeological features and deposits associated with a mid-nineteenth century (circa 1858) industrial facility historically known as Clark Mills Foundry. This facility was responsible for casting the bronze statue "Freedom," which currently sits atop the Capitol Building dome. As the project is federally provisioned, FTA and WMATA are proposing to conduct an archaeological resource identification survey to fulfill obligations outlined under Section 106 of the National Historic Preservation Act (NHPA).

As part of the ongoing cultural resource consultation process, FTA, WMATA, and the District of Columbia State Historic Preservation Office (DC SHPO), have previously determined an Area of Potential Effects (APE) for the current undertaking (Figure 2). The APE, as defined in 36 CFR 800.16(d), is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. As the existing onsite structures and associated facilities have undergone continuous development and subterranean modification (i.e. Underground Storage Tank [UST] installation) since the mid-twentieth century, the majority of the APE is considered to have low potential for containing intact, significant, archaeological features and/or deposits. Background and historic land use review, coupled with an assessment of the existing facilities present, has identified an area measuring 0.16 acres within the northern APE that has a high sensitivity for the presence of potentially significant features and deposits associated with the Clark Mills Foundry. This 0.16-acre area is considered an archaeological Area of Interest (AOI) within the overall Bladensburg Bus Division APE. The DC SHPO has determined that due to the nature of the undertaking and the historic nature of the area, archaeological investigations are warranted within the AOI.

This work plan provides an outline for a future archaeological survey (Phase I) to be conducted by a qualified archaeological consultant (Consultant) which complies with the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, the District of Columbia Guidelines for Archaeological Investigations in the District of Columbia and is pursuant to Section 106 of the National Historic Preservation Act of 1966 (as amended). The Phase I survey will also comply with the Programmatic Agreement (PA) executed between FTA, WMATA, and the DC SHPO pursuant to 36 CFR 800.14(b), for archaeological consideration of the AOI prior to the proposed undertaking.

Figure 1: USGS Map Showing the Location of the Bladensburg Bus Division Property



DC HPO #: 19-0405 | WMATA Bladensburg Bus Garage
USGS Project Location Map

Service Layer Credits: Esri, HERE, Garmin, (c) OpenStreetMap contributors
Copyright © 2013 National Geographic Society, (c) USGS Topographic Quadrangle, Washington East, DC (2016)

0 0.5 1 Kilometers

Figure 2: Current Aerial Detail Showing the APE and AOI



DC HPO #: 19-0405 | WMATA Bladensburg Bus Garage
Aerial Detail Location

Service Layer Credits: 2018 Esri, HERE, Garmin, (c) OpenStreetMap contributors
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

The Phase 1 archaeological survey and assessment will consist of four (4) primary tasks:

- Task 1: Archaeological and historical background research;*
- Task 2: Machine-assisted trenching/stripping and hand excavation within AOI;*
- Task 3: Artifact processing and analysis; and*
- Task 4: Preparation of Phase I survey documentation, including a Management Summary, and followed by a technical report detailing the results of the survey and site significance.*

Based on the results of the Phase I archaeological assessment, FTA and WMATA will consult with the DC SHPO regarding whether additional archaeological investigations at the Phase II and/or Phase III level (i.e. testing and/or data recovery) are warranted. The scope of further investigations beyond the Phase I survey will be detailed in an addendum work plan and submitted to the DC SHPO for review and approval prior to the commencement of any additional project undertaking related work within the AOI.

Findings of the Phase I technical report will be shared with the consulting parties for the WMATA Bladensburg Bus Division Redevelopment Project to inform the ongoing Section 106 consultation process. Earlier deliverables may be shared with consulting parties to the Project in consultation with the DC SHPO and the FTA for their information.

2 PROPOSED PROJECT UNDERTAKING AND ANTICIPATED REDEVELOPMENT PHASES

WMATA plans to demolish the existing Bladensburg Bus Garage to upgrade maintenance and support facilities at the WMATA Bladensburg Bus Division in Washington, DC. The Bladensburg Bus Garage is located on a 17.59-acre site in northeast Washington, DC, which will increase to 18.61 acres upon completion of the proposed project. The garage is bounded by 25th Place NE, Douglas Street NE, Bladensburg Road NE, and a CSX railroad line. The existing site consists of 246 parking spaces for 40-foot-long buses and 36 parking spaces for articulated buses. The planned development will create 200 parking spaces for 40-foot-long buses, 100 spaces for articulated buses, and 560 spaces for employee parking (including 62 dedicated spaces for non-revenue vehicles). The current garage facility only provides on-site parking for buses and non-revenue vehicles. The new facility will continue to provide service such as cleaning (interior and exterior), inspections, running repairs, heavy repairs and service, parts storage, crew reporting and dispatching, and employee service and welfare areas.

WMATA is proposing to demolish three buildings at their Bladensburg Bus Garage to and replace them with a central maintenance building with facilities to include natural gas and electric battery fueling and provide more on-site parking. The buildings to be demolished will include the Heavy Repair and Overhaul Building (BLDG 1) which dates from 1962, and two Bus Operating Garages (BLDGs 2 and 3), constructed in 1978 and 1980 respectively (see Figure 2). The project includes altering entrance areas, repaving the site and construction of the maintenance facility on the south side of the parcel. The north end of the site will include two additional parking rows for privately owned vehicles and buses. Ancillary corner locations will house tank farms, fueling stations, dumpsters, and snow melt. The redevelopment of the Bladensburg Bus Division is being optioned over a series of demolition and construction phases which will occur at

varying intervals. For the purposes of this work plan, the phases of construction will be referred to using Arabic numerals (e.g., 1, 2, 3) and archaeological survey levels by roman numerals (e.g., I, II, III).

Phase 1 of the proposed redevelopment will entail the demolition of BLDG 1 and the construction of a new maintenance facility and associated parking. Phase 2 of the redevelopment will entail the demolition of both BLDG 2 and 3 and construction of a new partial employee parking deck and bus facility entranceway. Phase 2 of the proposed redevelopment will occur within the entirety of the archaeological AOI as defined by the DC SHPO (see Figure 2). Phase 3 of the proposed redevelopment will entail the demolition of paved parking and the construction of a new employee parking deck. In accordance with the executed PA, the Phase I archaeological survey of the AOI will occur prior to the Redevelopment Phase 2 demolition and FTA shall ensure that no ground disturbing activities will commence in the AOI until the Phase I archaeological survey has been conducted. Furthermore, the PA Signatories will have to concur that the proposed project undertaking will not adversely affect eligible archaeological resources, or until any unavoidable adverse effects have been mitigated prior to any ground disturbing activities associated with implementation of Phase 2 of the proposed undertaking.

3 ARCHAEOLOGICAL BACKGROUND OF THE APE AND AOI

Pursuant to the completion of Task 1 outlined above in Section I, and prior to the commencement of Task 2, the Consultant will conduct background research in order to place the AOI into a cultural and historical context. The Consultant will review several sources of information when conducting background research and will include, but not be limited to, a review of:

- The DC SHPO archaeological database (as provided by the DC SHPO Project Data Review Memo);
- Previously completed archaeological surveys in the immediate area of the AOI;
- Historical maps and historical aerial photography;
- Historic and recent soil or sedimentation surveys of the APE;
- Sanborn Fire Insurance maps of the area and APE; and
- Other sources as identified and appropriate.

It is understood that all relevant prior cultural and historic studies pertaining to changes in the natural and built landscape of the APE and AOI should be reasonably pursued. It is anticipated that background research will likely need to be conducted at local repositories such as the Washingtoniana Room of the Washington D.C. Public Library, the Kiplinger Archives at the Historical Society of Washington D.C., the Gelman Library at George Washington University (GWU), and at the National Archives and Records (NARA) at College Park, Maryland. The goal of this research will be to provide a context for future National Register of Historic Places (NRHP) eligibility determinations of significance to be made for whatever archaeological sites or resources are identified as a result of completing Task 2. Currently, no portion of the Archaeological APE has been the previous subject of an archaeological investigation.

Figure 4: 1888 U.S. Coast and Geodetic Map Showing Location of the Octagonal Structure (Red Arrow).



In a 1951 aerial photograph, the general area of what would eventually become the Bladensburg Bus Facility is shown as largely undeveloped (Figure 5). The partial octagonal foundations from the nineteenth century structure are visible just south of the B&O railroad corridor, within the northeastern portion of the Archaeological APE. In a series of figures presented below (Figures 5-7), the nineteenth century foundations are visible within a portion of the current AOI. As the foundations are most likely associated with the nineteenth century industrial foundry operated by Clark Mills, the archaeological potential of the AOI is considered high to contain features and deposits.

In addition, based on the historic nature of area and the operational history of the Clark Mills Foundry, Civil War related material is possible. Other deposits predating the mid-nineteenth century, such as relating to the precontact era, are considered possible within the AOI; however, current and past land use has likely disturbed the potential for finding intact deposits or features.

Figure 5: 1951 Historic Aerial Photograph of Archaeological APE

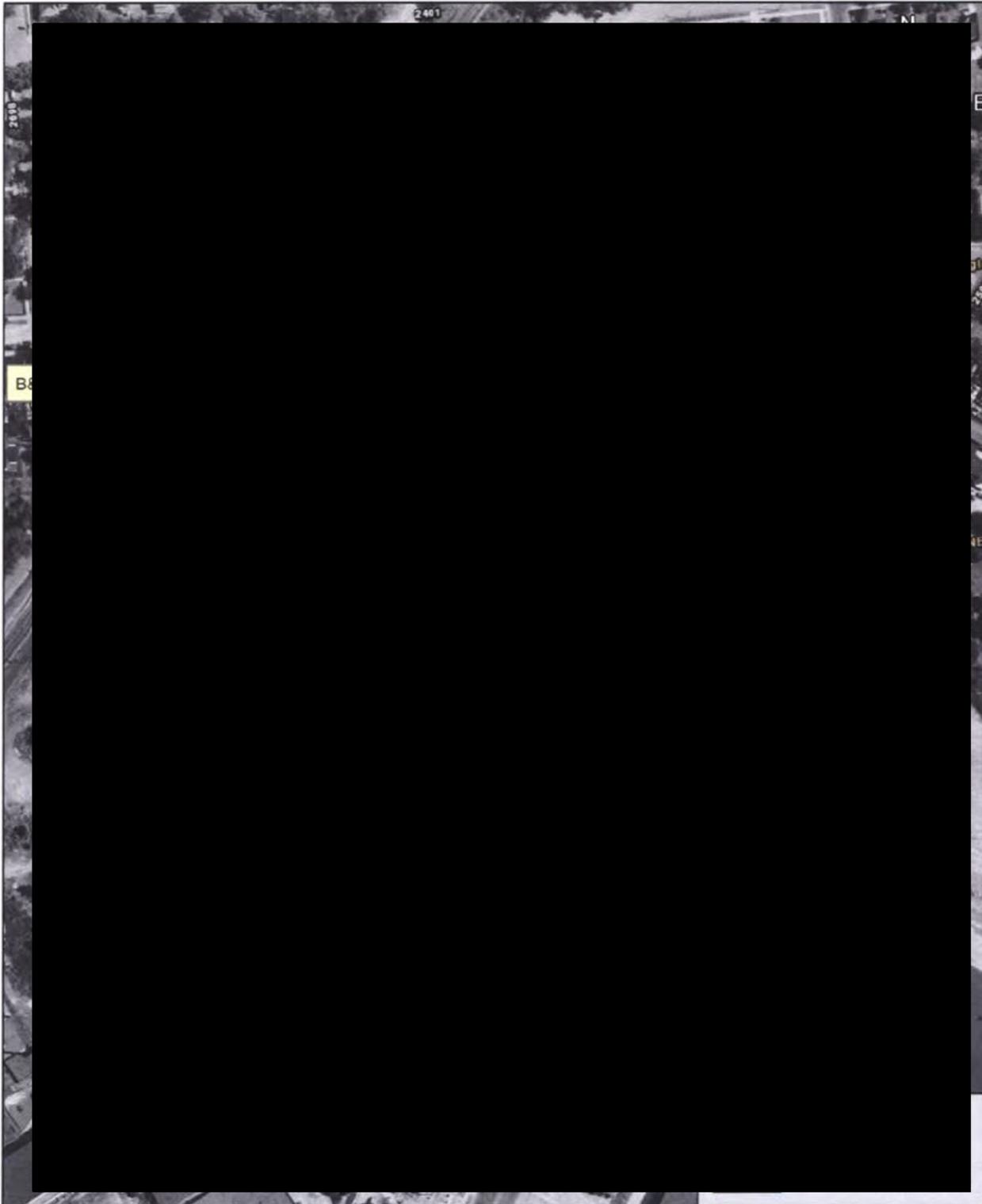


DC HPO #: 19-0405 | WMATA Bladensburg Bus Garage
1951 Aerial Photograph

Service Layer Credits: 1951 USGS Aerial Imagery Esri, HERE, Garmin, (c) OpenStreetMap contributors

0 50 100
Meters

Figure 6: 1951 Historic Aerial Photograph with Inset Showing General Area of Foundations

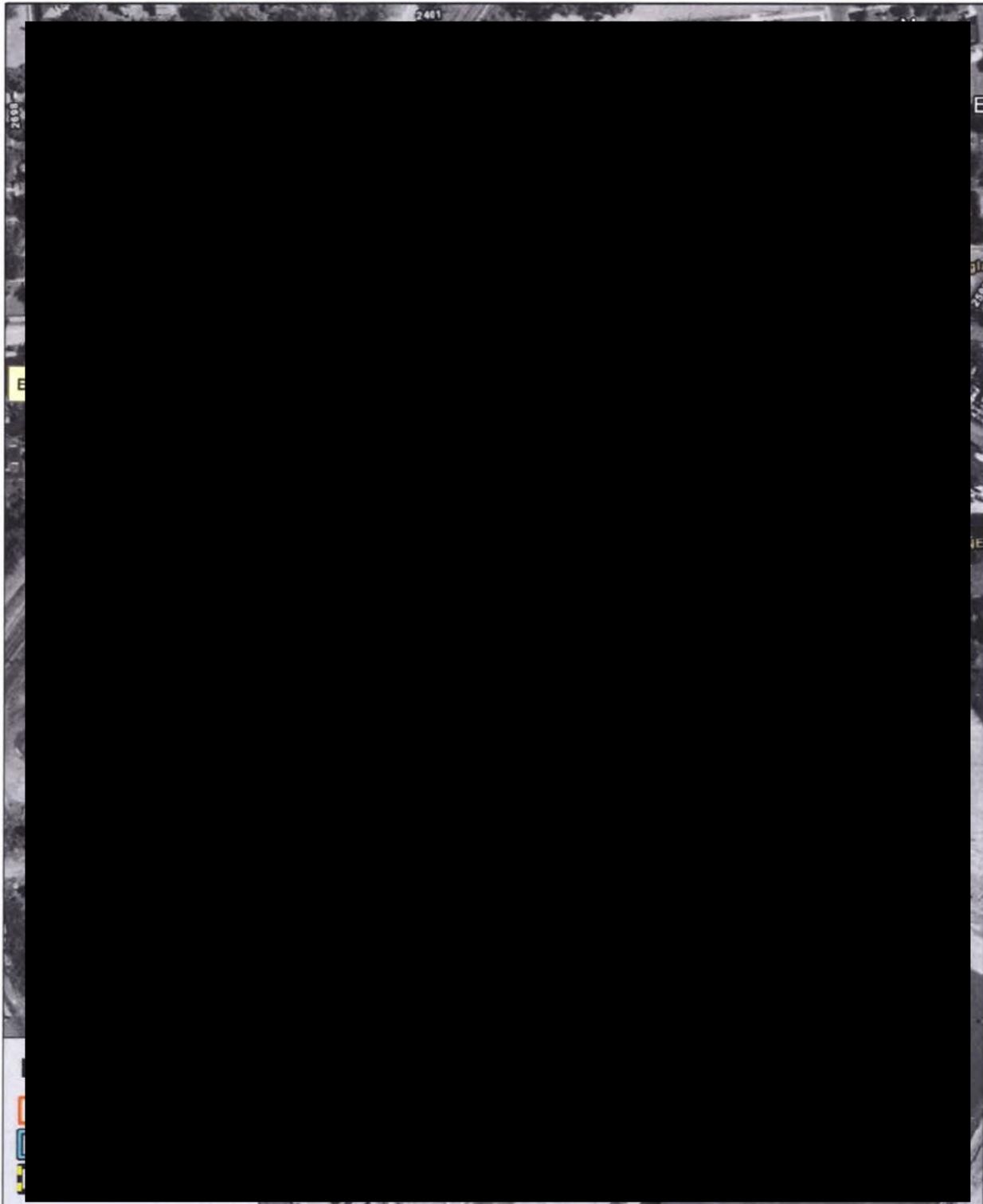


DC HPO #: 19-0405 | WMATA Bladensburg Bus Garage
1951 Aerial Photograph

Service Layer Credits. 1951 USGS Aerial Imagery Esri, HERE, Garmin, (c) OpenStreetMap contributors



Figure 7: 1951 Historic Aerial Photograph with Inset Showing Georeferenced Archaeological AOI and Foundations.



DC HPO #: 19-0405 | WMATA Blandensburg Bus Garage
1951 Aerial Photograph and AOI Detail

Service Layer Credits: 1951 USGS Aerial Imagery Esri, HERE, Garmin, (c) OpenStreetMap contributors



3.2 RESEARCH DESIGN

A series of research questions appropriate for a Phase I archaeological survey are suggested here based on the very brief historical context of the APE outlined in the previous section. The research focus for this scope is meant as a general guide to data collection within the AOI and should not restrict potential avenues of research should they arise during the field survey phase of the investigation. As stated previously, and in general, the AOI is primarily sensitive for the presence of remnant mid-nineteenth century structural foundations potentially associated with a foundry. The initial direction of any archaeological survey work within the AOI should concern whether the function of the structure can be determined. If the structure shown potentially within the AOI is the remnant foundation remains of either the Clark Mills Foundry or the workshop where pre-casting modeling work was done, archaeological features associated with this resource may yield important and significant information regarding unique casting methods and founding practices. For example, during its operational lifetime the Clark Mills Foundry was known to cast non-ferrous works (i.e. bronze sculpture) using a non-traditional, brick-lined pit, which was capable of generating intense heat using only pine-wood fuel without the use of either a chimney draft or bellows (The Sunday Star, January 17, 1937: D10). This may indicate that the Clark Mills Foundry only smelted bronze or other non-ferrous material which didn't require the high temperatures needed for iron working. This would indicate Clark Mills Foundry was limited in what it could produce, which may have had implications that it only served civilian (i.e. non-military) interests. Archaeological evidence for the functional nature of the foundry may possibly manifest in residual non-ferrous slag (e.g., bronze slag), oxidized-fired ceramic fragments, or vitrified brick or pine-wood "clinkers", and should be considered for data sampling, should concentrated deposits be identified.

Because there is minimal documentation regarding non-ferrous, mid-nineteenth century foundries, archaeological investigations within the AOI should seek to answer, or expand our collective knowledge on, the following research topics:

- Is there evidence of the Clark Mills Foundry present within the AOI, and if so, are the remnant foundations present unique to its function as an industrial facility?
- Given the relatively small sampling size of the AOI, can a functional layout of space be determined for either a mid-nineteenth century foundry or residential workshop?
- Clark Mills was largely a self-taught sculptor and metal worker. Is there evidence for the employment of unique casting/founding techniques within the AOI? How would these metallurgical techniques manifest in the archaeological record?

4 PROPOSED AOI SURVEY METHODOLOGY

According to the *Guidelines for Archaeological Investigations in the District of Columbia* (2018), the DC Historic Preservation Office (HPO) requires archaeological investigations to be conducted by a professional meeting the following minimum qualifications:

1. *At least one year of full-time professional experience or equivalent specialized training in archaeological research, administration or management;*
2. *At least four months of supervised field and analytical experience in general North American archaeology; and*
3. *Demonstrated ability to carry research to completion.*

Additionally, to be considered qualified to complete historic archaeological surveys, the consultant will have at least one year of full-time professional experience at a supervisory level in the study of archaeological resources of the historic period (36 CFR Part 61: Appendix A). Furthermore, the DC HPO requires that archaeologists leading investigations in the District have at least one year of full-time professional experience at a supervisory level in the study of archaeological resources found in urban contexts. The consultant will meet or exceed these standards for archaeological survey work within the Bladensburg Bus Garage AOI.

The purpose of the survey is to:

- Determine the presence or absence of archaeological deposits and features within the AOI;
- Determine the significance of any archaeological resources that are encountered during the survey; and
- Document archaeological resources encountered within the AOI and evaluate those resources through the application of criteria set forth by the NRHP.

The archaeological survey methodology described herein will facilitate the completion of Task 2 described above in Section I. Due to the nature of the current development onsite within the Archaeological AOI, the Phase I survey methods will consist of a series of machine-assisted (e.g., backhoe) trenches to identify buried structural features, and/or shafts that may be buried below pavement and historic fill. Trenches may be supplemented by hand-excavation where needed, as described below. Backhoe excavation is a commonly employed component of archaeological identification surveys conducted in densely developed urban areas where over-paving is present. Preliminary non-invasive survey methods including Ground Penetrating Radar (GPR) were considered, but since the overlaying pavement atop the Archaeological AOI consists of a substrate of iron re-bar mesh, magnetometry readings would likely be unreliable.

4.1 FIELD SURVEY

Prior to any ground disturbing activities within the AOI, mapping of the AOI and all general survey tasks and excavation units will be completed through use of a total station using an established datum. The first step in the survey will be to ground truth the entirety of the AOI by mechanically removing the paved surface area with a backhoe. This will be done by a mechanical operator provided by the Prime Contractor or Applicant, who will work in close coordination with the Principal Investigator (PI) of the archaeological survey. Once the pavement has been removed, trenches will be excavated in four primary locations within the AOI; roughly perpendicular to potentially extant foundations as georeferenced (see Figure 7; Figure 8). The following is presented in anticipation of archaeological features being identified through implementation of ground truthing activities and in accordance with Section V, part B, of the PA. As such, the following methodologies may conform to those typically employed during Phase II site testing and evaluations.

Trenches will be excavated in search of nineteenth century industrial and/or domestic features such as builder's trenches, shaft and refuse pits, industrial waste middens (i.e., clinker, slag piles, rejects), cisterns, wells, privies, etc. Trench excavation is designed to search for the presence or absence of shaft features, which will be minimally disturbed by backhoe activity. Trenches will be dug at approximately 1.5 to 1.8 meters (5 to 6 feet) in width to assess both site integrity and confirm the presence or absence of archaeological features. Per Occupational Safety and Health Administration (OSHA) guidelines, step trenching will be employed for trenches dug in excess of four feet below the ground surface for safe access/egress. If foundation or shaft features are identified, then backhoe excavation will cease, and archaeologists will hand excavate by shovel and trowel to clear away and expose the feature. Similarly, if

Figure 8: Proposed Machine-Assisted Trench Locations Within the AOI.



DC HPO #: 19-0405 | WMATA Bladensburg Bus Garage
Proposed Trench Locations

Service Layer Credits: 1951 USGS Aerial Imagery Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

0 5 10
Meters

nineteenth century ground surface is exposed during trenching, then backhoe excavation will cease, and archaeologists will excavate a limited number (as-yet-to-be determined) of 1 x 1-meter (3.3 x 3.3-foot) test units (TUs) and/or shovel test pits (STPs) to further assess site integrity and the presence or absence of historic artifacts. Ultimately, the number of TUs and/or STPs will be determined by the type of resources identified through trenching. Given the overall nature of the site, and high potential for modern disturbances, TUs and/or STPs may not be needed. by the type STPs will measure approximately 40 centimeters (cm) (15.7 inches [in]) in diameter. All hand excavated soils will be screened using ¼-inch mesh hardware cloth for uniform artifact recovery. Standardized data for each trench, TU, and STP will be collected on forms and in notebooks; information recorded will consist of depth, Munsell soil color for each encountered soil strata, and the number and type of each artifact encountered if applicable. All trenches, TUs, and STPs will be drawn and photographed in profile and plan views. The survey will be documented through digital photography.

4.2 ARTIFACT COLLECTION

Artifact collection will focus on diagnostic items (e.g., intact bottles, ceramics, personal items, organic materials, etc.) that can provide more information regarding the temporal association and function of the artifact assemblage than can non-diagnostic artifacts (e.g., non-diagnostic bottle glass, window glass, and rusted metal). In the event of large numbers of similar artifacts (e.g., window glass, brick, etc.), artifacts will be sampled by volume. Sampled artifacts will be systematically collected from all depths from within each feature and soil samples will be collected as necessary.

If features are encountered during the course of field survey, (e.g., concentrations of waste material particular to industrial foundries), their contents will be considered diagnostic and sampling will be complete for each feature identified. Further laboratory analysis of feature material and artifacts may be conducted pending further consultation with the DC SHPO. Since the scope of archaeological artifact analysis is dependent on discovery, specialized analyses may be required and will be developed in a separate scope in consultation with the DC SHPO.

Artifacts encountered will be collected and bagged. Artifact bags will be labeled separately based on provenience with the project name, field site number, TU, STP number, and artifact depth relative to the ground surface. Upon field survey completion, artifacts will be transported to an artifact processing archaeological laboratory. Artifacts will then be washed, sorted, and divided by class/type and assigned a catalog number. Diagnostic artifacts will be labeled using Acryloid B-72 lacquer and permanent black ink. Artifacts will be placed in resealable polyethylene bags with catalog tags and bag information enclosed. Artifact bags will then be placed in archival stable acid-free boxes.

In processing the recovered artifacts and preparing the assemblage for curation, the consultant shall prepare an overall collections database for the artifacts recovered during the course of the investigation. The database will conform to the standards outlined in the District of Columbia Office of Planning guidelines *Submitting Electronic Collections Data to DC HPO* and submitted for electronic curation. Following approval of the final report, related materials, including all field notes, photographs and other information produced throughout the course of this survey will be submitted to a curation facility, which may include the DC SHPO, which meets the standards defined in 36 CFR Part 79, Curation of Federally-Owned and Administered Collections; Final Rule.

Artifact processing will conform to Chapter V: Processing and Curation of Collections (Artifacts and Records) in the *Guidelines for Archaeological Investigations in the District of Columbia*, and Section V, part C, of the PA.

5 TECHNICAL REPORT PREPARATION

Following the completion of the field survey and artifact analysis/processing, a draft management summary, including tables, maps, illustrations, and figures, as appropriate, will be prepared documenting the goals and objectives of all aspects of the investigation for DC SHPO review. The goal of the management summary will be to reach consensus as to the archaeological resource potential and, if applicable, recommendations for additional archaeological investigations within the AOI.

Upon receiving comments on the management summary, a draft technical report, including tables, maps, illustrations, and figures, as appropriate, will be prepared documenting the goals and objectives of all aspects of the investigation for DC SHPO review and comment. The technical report will present appropriate environmental, precontact, and historical background information, the research strategies, methods, procedures of the investigation, results, interpretations, and recommendations. Tabular data and other supporting information will be appended. The project team will consider all comments from DC SHPO and will prepare a final report for submission. The draft technical report will include the following sections:

1. *Abstract/Management Summary*
2. *Public Report Summary*
3. *Introduction*
4. *Project Survey Area Location and Scope of Work*
5. *Research Design*
6. *Environmental Context*
7. *Cultural Context*
8. *Results of the Background Research*
9. *Field and Laboratory Methods*
10. *Results*
11. *NRHP Evaluation and Recommendations*
12. *Direction for Future Management*
13. *References Cited/Bibliography*

Appendices will include:

1. *Statement of Qualifications*
2. *Scope of Work/Work Plan*
3. *Special Studies (if needed)*
4. *Artifact Catalog*
5. *Relevant Historic Documents*
6. *Relevant correspondence*
7. *National Archaeological Database – Reports Recording Form*

The technical report detailing the findings of the survey and recommendations will conform to Chapter VI: Reporting Standards for Archaeological Studies in the *Guidelines for Archaeological Investigations in the District of Columbia*, and Section V, part D, of the PA.

6 MITIGATIONS AND ALTERNATIVE TREATMENT OPTIONS

The type of archaeological resources identified within the AOI will determine the treatment to mitigate adverse effects to eligible resources. The type of mitigation, such as data recovery and/or an alternative treatment option, will be determined in consultation with the DC SHPO and a work plan prepared for DC SHPO review and approval. Data recovery is inappropriate for some types of archaeological resources, including architectural remains with few associated artifacts or related archaeological features such as might be expected if Clark Mills Foundry remains are identified.

6.1 ALTERNATIVE TREATMENT OPTIONS

Should Phase III data recovery not be selected as a treatment option, the following alternative treatment options are suggested for mitigation:

- Public outreach;
- Development of educational materials (e.g., brochures, posters, signage);
- GIS story map;
- Conference presentation;
- Website development;
- Historic American Engineering Record (HAER) or the Historic American Buildings Survey (HABS) level documentation of architectural data with emphasis on Clark Mills' innovative founding methods; and/or
- Conducting detailed research on Clark Mills, his founding techniques, and the construction engineering of the foundry and/or his associated business that contribute to the significance of the data and to the historic context of the eligible resources.

Depending on the resources identified, other mitigative treatments may be developed that are not outlined either above, or in Section VI, part A, of the PA.

7 REFERENCES CITED

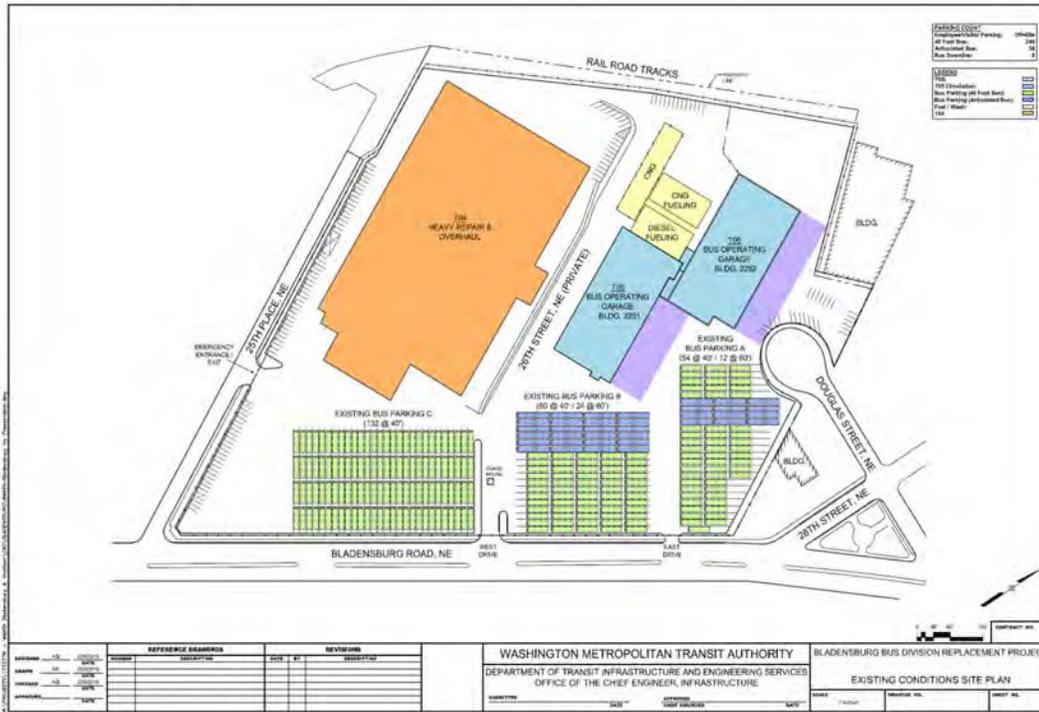
District of Columbia Historic Preservation Office (DC SHPO)

2018 *Guidelines for Archaeological Investigations in the District of Columbia*. Washington, D.C.

Evans, Jessie Fant

1937 Sculptor of Jackson Statue Changed System of Casting. *The Sunday Star* 17 January: D10. Washington D.C.

Figure 1: Existing Site and Proposed New Construction

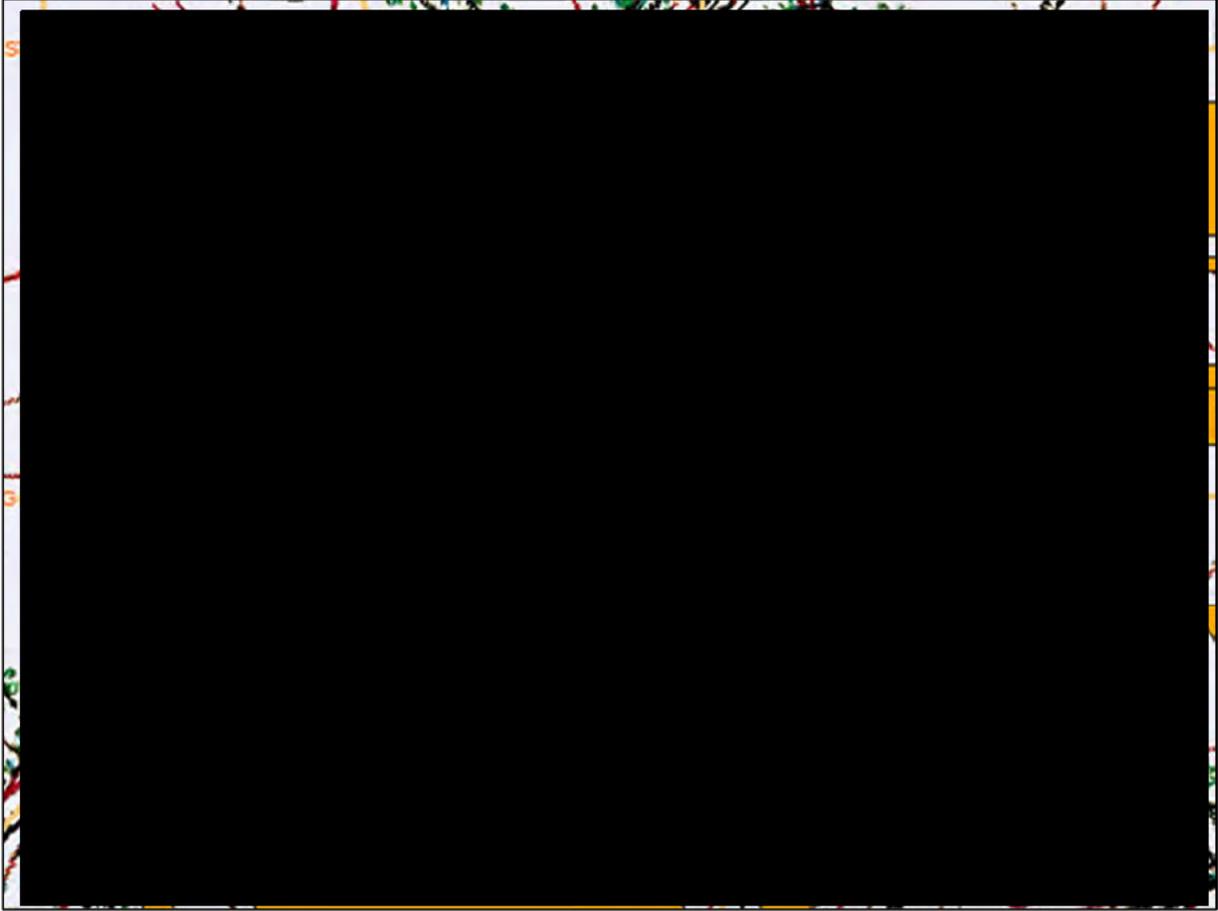


Existing Site Plan Conditions



Proposed New Construction Site Plan

Figure 2: GIS Overlay with Current Buildings and Foundry Footprint



**GIS Overlay of 1888 US Coast and Geodetic Survey Sheet 7 (NOAA)
with Current Building and Foundry Footprints**