

The Committee of 100 on the Federal City



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DC Street Car - H St. - ATTN: Historic Preservation
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Dear Sir or Madam:

The Committee of 100 welcomes the opportunity to comment on the *Proposed Mitigation Measures to Resolve Adverse Effects on Historic Properties by the DC DOT and the DC Historic Preservation Office regarding The One City Streetcar Line: H St./Benning Road, NE*. The Committee supports development of a well-planned streetcar system that provides a permanent mass transit service while avoiding negative impacts on communities.

DDOT and the SHPO are correct in their conclusion that the installation of the overhead catenary system (OCS) within L'Enfant's Plan of the City of Washington, the introduction of the car barn into the setting of the historic Spingarn/Phelps school campus; and the placement of above-ground mid-line power substations within public space will have adverse effects on historic properties.

While the adverse effects of the H Street-Benning Road line and the Spingarn maintenance facility occasion the proposed mitigation measures, they do nothing to mitigate the direct impact of the overhead wires on H St./Benning Road or the car barn on the Spingarn/Phelps campus. In fact, there is little that can be done to mitigate these impacts, except through exemplary architecture that would compliment, rather than compete with and degrade, the Spingarn campus structures; and by minimizing the number of tracks and overhead wires in a manner that would maximize green space and not degrade the view shed of the Spingarn campus.

Before even the first streetcar rolls, the city will suffer avoidable negative impacts. **Significant mitigation measures that are far stronger than those proposed by DDOT and the SHPO could, if fully implemented, benefit the entire streetcar system as it develops.**

Our specific comments on each proposed action follow:

#1: Documentation of Historic Car Barns/Interpretive Materials

We support documentation of the historic District of Columbia streetcar system, and suggest that it include a complete discussion of the exemplary architecture of as many car barns built to support the original system as possible, even though only some of them still exist (Georgetown, East Capitol and 15th, and the Blue Castle). This could provide a benchmark for the design of car barns/maintenance facilities to support the new streetcar system. We are not asking for a replication of these structures, but rather to understand better how the 100-year old tradition of building mass transit structures in this city. The city should settle for no less than the highest design standards for new car barns so that these public structures will be assets to neighborhoods where they are located.

We do not object to the development of interpretive materials, but we do not regard this either as a priority or as offering any mitigation benefits. If such materials are to be developed, we suggest that the Office of Cultural Tourism take part in developing such materials.

#2. Historic Streetcars

We suggest that you eliminate this item from further consideration. There is little point in acquiring and restoring historic streetcars for passenger service because that would rely on overhead wires, contrary to the goal of moving forward with propulsion technologies that do not require overhead wires.

#3: Investigation of Alternative Modes of Propulsion

We suggest substituting the following language:

DDOT will engage an internationally recognized engineering firm with experience in alternative propulsion systems to investigate and evaluate non-overhead wire technologies to implement wherever feasible and as soon as practicable. In establishing the study parameters prior to issuance of the contract, DDOT will consult with the SHPO and the public about questions the study should address. At the beginning of the study, the selected consultants will meet with representatives from civic groups that have expressed concern about the damaging effects of overhead wires on the city so that the questions they have raised since the system's inception can be addressed in the study.

#4: Project Design Review

Suggested additional language:

DDOT and the Historic Preservation Office shall conduct a design competition to select a nationally recognized architecture firm (including a consulting civil engineer) to develop design standards and guidelines for the next generation of car barns or other necessary structures, facilities and features that could have a visual impact upon a community. The documentation developed in Item 1 above, should be provided as a part of the solicitation of competing architects and civil engineers. The process needs to include an opportunity for public review and

input, including the advice and input of the Historic Preservation Office and the Commission on Fine Arts. These assets must constitute a legacy of great public works, be of exceptional quality and fit well within DC's varied communities as did the first generation of car barns.

#5: Consultation Regarding Future Streetcar Routes, Car Barns, Power Substations And Related Matters We suggest that the focus of this activity should be **Develop a System-Wide Master Plan And Cost Projections for Land Acquisition, Maintenance, Storage Facilities and Related Matters.**

The city has not determined locations for equipment storage and maintenance except for Phase I at the historic Spingarn/Phelps education campus. Yet, vacant land for future storage and maintenance facilities is rapidly disappearing for other uses. As with the design of the facilities, the siting or location of the facilities should seek input from the Historic Preservation Office and the Commission of Fine Arts, as well as local input from potentially affected communities. The size and neighborhood impact of these ancillary facilities could be considerable. The city should:

- Inventory and set aside publicly owned properties that can house these ancillary facilities;
- Begin early discussions with private owners whose property may be affected by the location of maintenance and storage facilities;
- Acquire private land as necessary; and
- Prior to final selection and and/or purchase or lease of property, ensure adequate public notice and opportunity for comment.

In consultation with the SHPO and the public, DDOT shall investigate ways to avoid locating any above ground power substations within public space for any future streetcar lines. If any instances should arise in which it appears that it may be technically and financially unfeasible to avoid locating an above ground power substation in public space, DDOT shall consult with the SHPO and other representatives from the Office of Planning (OP) to ensure that all alternative locations have been identified and eliminated as viable options. DDOT shall include the communities surrounding these substations in these discussions and consultations.

#6: Archaeological Investigations

As currently written this section appears to apply only to the Spingarn site. The described procedures should apply to all sites associated with the future streetcar system.

The goal of all planning, design, acquisition and maintenance efforts moving forward should be to **build a world-class streetcar system for a world-class city**. This system should also reflect and respond to the needs and concerns of the residents it will serve and strive to enhance the corridors it will serve rather than detract from them. Anything short of that goal is an unacceptable loss for future generations.

Thank you for this opportunity to comment.

Sincerely yours,

Meg Maguire, Chair of Transportation Subcommittee