



DEPARTMENT OF THE ARMY
BALTIMORE DISTRICT, CORPS OF ENGINEERS
2 HOPKINS PLAZA
BALTIMORE, MARYLAND 21201

22 December 2025

Mr. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office, DC Office of Planning
1100 4th Street, SW Suite E650
Washington, DC 20024
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SUBJECT: USACE After Action Review (AAR) – Georgetown Castle Gatehouse

Dear Mr. Lewis:

In June 2025, the United States Army Corps of Engineers (USACE) Baltimore District and the D.C. State Historic Preservation Office (SHPO) signed a Memorandum of Agreement (MOA) regarding the restoration and partial reconstruction of the Georgetown Castle Gatehouse at the Georgetown Reservoir, Washington Aqueduct, Washington, D.C. in accordance with Section 106 of the National Historic Preservation Act (NHPA). Stipulation II.f. of that document stated:

“After Action Review (AAR): USACE will complete an AAR involving the entire project delivery team to analyze the life of the project (strengths, weaknesses, opportunities, and threats) and what happened that resulted in this adverse effect. As part of this AAR, USACE will identify recommended training for staff and standard operating procedures for all future projects at WA. Within six (6) months of the signing of this MOA, USACE will provide ACHP, DC SHPO, and the Consulting Parties a written summary with conclusions and path forward for internal NHPA process improvements at Baltimore District.”

On 18 December 2025, USACE held an internal AAR for the Project Delivery Team (PDT). Participants included representatives from Planning Division (PL), Engineering Division (EN), Construction Division (CO), Contracting Division, Office of Counsel, the Washington Aqueduct (WA), and the Corporate Board. The PDT discussed the project background and scope, the circumstances surrounding the adverse effect to historic properties, and overall project strengths, weaknesses, opportunities, and threats. A brief summary of the AAR conclusions is included for your awareness in the Enclosure. USACE acknowledges that this AAR was only one step in making improvements to the agency’s internal standard operating procedures and best practices within the ever changing and challenging environment of military construction, especially as stewards of the nation’s historic properties. We appreciate your continued partnership and look forward to consulting with your agency on future undertakings.

Sincerely,

Amy M. Guise
Chief, Planning Division

Enclosure

cc:

National Park Service, Kathryn Smith, kathryn_smith@nps.gov
Advisory Council on Historic Preservation, Chris Daniel, daniel@achp.gov, e106@achp.gov Association of the Oldest Inhabitants of the District of Columbia, aoiofdc@gmail.com
D.C. Preservation, Rebecca Miller, rebecca@dcpreservation.org
Foxhall Community Citizens Association, Paul Don Vitopauldonvitodc@gmail.com

Enclosure

Castle Gatehouse Washington Aqueduct Key After Action Review Conclusions

Identification of Section 106 of the NHPA Training Needs

- USACE will determine appropriate training courses required for key staff at WA and CO including onsite construction representatives (both Internal and External opportunities).
 - A list of these trainings has been initiated, and identification of staff is ongoing.

Improved Communication within the Internal PDT for Projects Involving Historic Properties

- A USACE Section 106 Point of Contact (POC) will be assigned for all undertakings. This POC will be identified and assigned during project initiation and will remain involved through the life cycle of the undertaking, including through the construction phase.
 - WA POC- Audrey Litz, Audrey.K.Litz@usace.army.mil
 - PL POCs- Eva Falls, Eva.E.Falls@usace.army.mil, and Ethan Bean, Ethan.A.Bean@usace.army.mil
- When a historic structure or cultural resources have been identified in National Environmental Policy Act/NHPA project documentation, ensure the Project Management Plan clearly states that coordination with the Section 106 POC is necessary throughout the life cycle of the project and specifically required at project initiation, construction kick-off, and at key milestones. Coordination should include but is not limited to:
 - Identify level of involvement and appropriate labor funding streams
 - Key milestones include the approval of scope modifications that could adversely affect the historic property, alter the area of potential effect, or alter any USACE commitments regarding the NHPA resources in the area of potential effect.
- Increase frequency of meetings/coordination with PDT technical staff as the project transitions from design into construction, ensuring that project managers, construction staff, and contractors are aware of NHPA resources in the area of potential effect, and any USACE commitments regarding those resources.
- Increased oversight by trained agency representatives on active construction sites.

Improved Communication with External Stakeholders for Projects Involving Historic Properties

- While contractors may support consultation, USACE POCs should be involved in all correspondence with external stakeholders.
 - WA and EN have created new standard language for all future AE contract scopes of work to clarify Section 106 consultation requirements and expectations.
- Any differing site conditions identified during construction or potential scope modifications that could adversely affect the historic property, alter the area of potential effect, or alter any USACE commitments regarding the NHPA resources in the area of potential effect will be promptly communicated with the project stakeholders and consulting parties.