

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



March 24, 2011

Mr. Michael A. Caldwell
Acting Superintendent, National Mall and Memorial Parks
National Park Service
900 Ohio Drive, SW
Washington, DC 20024-2000

RE: Initiation of Section 106 Consultation for the Kennedy Center Potomac River Pedestrian Access Improvement Project

Dear Mr. Caldwell:

Thank you for contacting the DC State Historic Preservation Office (SHPO) to formally initiate the Section 106 review process for the above-referenced undertaking. We have participated in two preliminary meetings with representatives from the National Park Service (NPS), the Federal Highway Administration (FHWA) the District Department of Transportation (DDOT) and the Kennedy Center for the Performing Arts (Kennedy Center) to discuss some of the issues associated with the proposed project. Based upon the discussions held in those meetings and our review of the information included with your submittal, we are writing to provide our initial comments regarding effects on historic properties.

We understand that the NPS is working in cooperation with FHWA and DDOT to prepare an Environmental Assessment (EA) for the project and that the National Environmental Policy Act (NEPA) and Section 106 reviews will be coordinated in accordance with 36 CFR 800.8. We also understand that an initial scoping meeting took place on February 22, 2011. We look forward to reviewing the EA and supplemental Section 106 documentation when it becomes available.

We concur that the Area of Potential Effect (APE) proposed by the NPS should adequately take into account all of the direct and indirect effects associated with the project and that enough information about the known historic properties within the APE exists to eliminate the need for additional survey.

However, the question of whether or not the Kennedy Center is individually eligible for listing in the National Register of Historic Places remains critical to determining the effects of the undertaking, especially since the proposed access steps will directly alter the building itself. Therefore, we request that a Determination of Eligibility (DOE) Form be prepared to formally apply the National Register Criteria for Evaluation to the Kennedy Center.

With regard to the design of the proposed new stairs, we note that SHPO staff did participate in the development of the early design concepts to a limited degree, but that no formal determinations of effect were made for these proposals. Direct and indirect effects that may result from construction of the access steps and the transfer of NPS jurisdiction over the project site will need to be evaluated as we move forward in the Section 106 process. We appreciate that the NPS has acknowledged its intention to work with our office and others to identify and evaluate modifications to the proposed project that will avoid, minimize or mitigate any adverse effects that may be identified.

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Finally, we concur with the list of consulting parties that the NPS has developed for the undertaking and we agree that effects on archaeological resources are unlikely given that the proposed project site is located on fill over former marshland.

We will provide further comments regarding effects on historic properties as soon as we have an opportunity to review the requested additional information. In the meantime, please contact me at andrew.lewis@dc.gov or 202-442-8841 if you should have any questions or comments regarding the historic built environment. Questions or comments relating to archaeology should be directed to Ruth Troccoli at ruth.troccoli@dc.gov or 202-442-8836. Thank you for providing this initial opportunity to review and comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Lewis", is positioned above the typed name.

C. Andrew Lewis

Senior Historic Preservation Specialist

DC State Historic Preservation Office

11-122

cc: Claudette Donlon, Kennedy Center
Jack Van Dop, FHWA
Saadat Kahn, DDOT