

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



August 20, 2015

Ms. Karen L. Cucurullo
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 Banneker Park Pedestrian Access Improvements Project

Dear Ms. Cucurullo:

Thank you for initiating consultation with the DC State Historic Preservation Office (SHPO) regarding the above-referenced undertaking. We are writing in accordance with Section 106 of the National Historic Preservation and its implementing regulations, 36 CFR Part 800, to provide initial comments regarding effects on historic properties.

The proposed project involves constructing an interim pedestrian connection between the NPS-owned 10th Street Overlook/Banneker Park and the new waterfront development currently under construction along Maine Avenue, SW. Related improvements such as landscaping, lighting and stormwater management interventions will also be included. We understand that the new connection will be subject to NCPC approval and that the term “interim” is being used to describe a period of time which may last up to ten years, or possibly longer.

Banneker Park has been determined eligible for listing in the National Register of Historic Places as an example of the work of noted Modernist Landscape Architect Daniel Kiley, and because of its significant role in the planning and [re]development of Southwest DC. A number of other historic properties are also located within the proposed Area of Potential Effect (APE). We concur that the APE is sufficient to take into account the effects of the undertaking, but would not be opposed if it were refined slightly to exclude areas where the project is not likely to be visible, or where other construction-related effects are not likely to be perceptible (e.g. Arena Stage, St. Dominic’s Church).


Two concepts for the new pedestrian connection were included in your project submittal. Opportunities for public comment were provided at a recent open house, and additional opportunities will be provided in future Section 106 meetings. We would appreciate being informed of the groups and individuals who have been invited and/or requested consulting party status as well as being copied on any historic preservation-related comments the NPS may receive as a result of the NEPA scoping process.

Although it is premature to evaluate the effects of preliminary designs, we believe a wider range of alternatives would increase the chances of ensuring compatibility with Kiley’s design, meeting the project’s “purpose and need,” and decreasing the potential for adverse effects that may result from damage to historic fabric or other alterations to the landscape. We look forward to working with the NPS and consulting parties to evaluate and refine the existing concepts, and to develop new alternatives, as appropriate.

Ms. Karen L. Cucurullo
Initiation of Section 106 Consultation for the Banneker Park Pedestrian Access Improvements Project
August 20, 2015
Page 2

If you should have any questions or comments regarding this matter, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, thank you for providing this initial opportunity to review and comment.

Sincerely,



C. Andrew Lewis

Senior Historic Preservation Specialist
District of Columbia State Historic Preservation Office

cc: Brett Schrader, Stantec Consulting Services Inc.
Catherine Dewey, NPS
Jennifer Hirsch, NCPC