

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



April 21, 2016

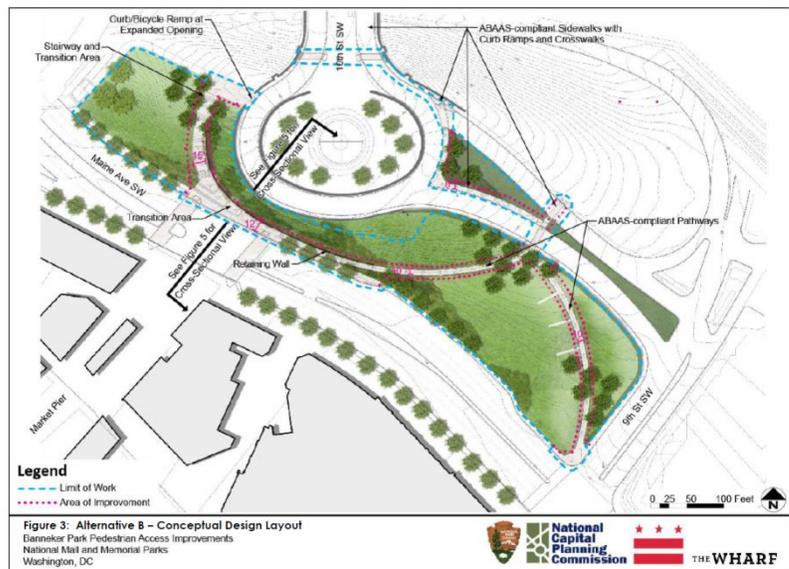
Mr. Michael Commisso
Cultural Resources Program Manager
National Mall and Memorial Parks
National Park Service
900 Ohio Drive, SW
Washington, DC 20024-2000

RE: Assessment of Effects Report for the Banneker Park Pedestrian Access Improvements Project
(aka Benjamin Banneker Park Connection Project)

Dear Mr. Commisso:

Thank you for providing the DC State Historic Preservation Office (SHPO) with a copy of the Assessment of Effect Report for the above-referenced undertaking. We have reviewed the report and are writing in accordance with Section 106 of the National Historic Preservation and its implementing regulations, 36 CFR Part 800, to provide additional comments regarding effects on historic properties.

We appreciate that the report was very thorough, well-written and accurately reflects our recollections from the discussions held in the numerous agency planning and consulting parties meetings we have participated in over the last year or so. Overall, we agree with the findings outlined in the report and reiterate that even though some historic fabric will be altered and some new elements introduced as a result of the implementation of the preferred Alternative B (right), the proposed changes will not constitute an “adverse effect” on Benjamin Banneker Park or any other historic property within the project’s Area of Potential Effect.



The reasons for this finding is that the proposed alterations to character-defining features of Benjamin Banneker Park will be relatively minor in scale and scope and will not result in a substantial diminishment of the integrity of the historic property. Examples include widening an existing, non-original opening in one of the park’s outer walls; substituting a retaining wall for a portion of the riprap embankment that was originally intended to be screened with vegetation; and the removal/replacement of some Japanese yew.

Similarly, the introduction of new elements such as the new stairway and pathways will not diminish the integrity of Benjamin Banneker Park because these new elements have been designed to be compatible with the park and in keeping with the curvilinear nature of Daniel Urban Kiely's original plans.

For the reasons outlined above and described in more detail in the Assessment of Effect Report, we concur that implementation of the Benjamin Banneker Park Pedestrian Access Improvements / Benjamin Banneker Park Connection Project will have "no adverse effect" on historic properties provided that the NPS will forward more detailed project plans to our office for review when they are developed and will incorporate our comments into those plans to the maximum extent feasible. In particular, we request an opportunity to review more detailed landscape plans which should be based upon, but not necessarily replicate, Kiely's original designs. We also look forward to reviewing and commenting further on materials, lighting, and other aspects of the project.

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 an opportunity to review and comment.

Sincerely,



C. Andrew Lewis
Senior Historic Preservation Specialist
District of Columbia State Historic Preservation Office

15-0428
cc: Brett Schrader, Stantec Consulting Services Inc.
Jennifer Hirsch, NCPC