February 11, 2016

Ms. Perry Wheelock
Associate Regional Director
National Park Service - National Capital Region
1100 Ohio Drive, SW
Washington, DC 20242

RE: Pennsylvania Avenue NW Cultural Landscape Inventory

Dear Perry:

The D.C. Historic Preservation Office has received and reviewed the final draft of the Pennsylvania Avenue NW Cultural Landscape Inventory (CLI) prepared by the National Park Service. The report addressing Pennsylvania Avenue, NW from the White House to the Capitol is a well-researched document that offers invaluable history on the cultural landscapes of Pennsylvania Avenue. We appreciate the opportunity to review and learn from it.

As described in the report, the CLI includes only those properties owned or managed by the National Park Service along Pennsylvania Avenue, NW, within the NPS park unit named the Pennsylvania Avenue National Historic Site. The CLI identifies landscape features that contribute to the significance of the Pennsylvania Avenue NW cultural landscape, and makes the case that these landscapes, as a coordinated group developed by the Pennsylvania Avenue Development Corporation (PADC), meet the test for National Register eligibility. We believe the CLI supports that conclusion and concur with that determination.

The CLI does not evaluate other cultural landscapes within the larger National Register district called the Pennsylvania Avenue National Historic Site (designated 1966). Many of the cited landscape features noted in the CLI either were not addressed in that nomination (updated 2007), or fall outside of its period of significance.

We understand that the purpose of the CLI is to serve as an independent document that addresses NPS responsibilities for evaluation of National Register-eligible properties within its jurisdiction. We anticipate that it will serve as an excellent foundation for those duties. It is also an important first step toward a more complete evaluation of the entire Pennsylvania Avenue development project, both in its public improvements and real estate development components. However, we are not encouraging a further evaluation of or amendment to the National Register nomination at this time. The 1974 Pennsylvania Avenue Plan is still being implemented, most recently with
the FBI Building redevelopment, and we do not believe sufficient perspective of time yet exists for addressing the eligibility of PADC’s building program or of properties developed under its auspices.

We very much appreciate your working so closely with our office on this document, as well as your continuing patience as we have considered its findings carefully from the standpoint of various SHPO responsibilities. As discussed recently with your staff, one of our primary concerns has been to avoid public and professional confusion by using terminology that distinguishes the cultural landscape along Pennsylvania Avenue, as evaluated in this document, from the remainder of the historic site listed in the National Register.

We have also suggested that the significance for the Pennsylvania Avenue NW cultural landscape from 1962 to 1996 should be considered to include its relevance to the growing influence of the historic preservation movement both nationally and locally. Preservation concerns significantly influenced the evolution of the landscape designs, as they simultaneously had even greater influence on the buildings developed along the Avenue. The abandonment of the proposed National Square, successive modifications to the sidewalk widening plans, and the Aleksandra Kasuba sidewalk art installation highlighting the restored Old Post Office are among those changes that took place under the national spotlight of changes to the “nation’s Main Street.” A fuller evaluation of those historic preservation issues should to await a future update of the National Register nomination.

The DC SHPO concurs with the Pennsylvania Avenue CLI and these findings:

• The Pennsylvania Avenue NW Cultural Landscape retains integrity to its period of significance, 1791-1996.
• The Pennsylvania Avenue NW Cultural Landscape is significant under Criteria A and C, and under Criterion Consideration G.
• The areas of significance are community planning and development, and landscape architecture
• The current landscape principally reflects the redevelopment of the Avenue within the last fifty years as a showcase exemplifying a modern and post-modern transformation of America’s “Main Street” under the direction of the Pennsylvania Avenue Development Corporation and the presidential commissions that preceded it.
• The enumerated list of cultural landscape resources of the Pennsylvania Avenue NW CLI retain integrity and contribute to its historic character (see list).

Sincerely,

[Signature]

David Maloney
District of Columbia Historic Preservation Officer