



## United States Department of the Interior

NATIONAL PARK SERVICE  
Northeast Region  
1234 Market Street, 20<sup>th</sup> Floor  
Philadelphia, PA 19107

IN REPLY REFER TO:  
I.A.2.(NER-RSS)

October 3, 2018

Dorothy Fue Wong, Ph.D.  
601 North Grand Avenue, Apt 460  
Los Angeles, California 90012

Dear Dr. Wong:

Thank you for your interest in the National Historic Landmark (NHL) program and your inquiry about the consideration of the Sunnyside Gardens Historic District (HD) in New York City (Queens County), NY as a potential NHL. NHLs are the most significant places in American history and they illustrate and commemorate the nation's collective past. Because of the high degree of significance and integrity that all NHLs must possess, we conduct a thorough examination of every proposed property and district during the inquiry process. We have reviewed the material you sent about the Sunnyside Gardens HD, assessed the district eligibility, and conducted a site visit with members of the Sunnyside Gardens Preservation Alliance to evaluate integrity. We are encouraged by the integrity of the district as well as the national significance of Sunnyside Gardens for early American suburban design. For this reason, we encourage you to go forward with nominating the district as an NHL, and we have provided guidance on how to structure the nomination below.

Sunnyside Gardens appears to be nationally significant as the first successful manifestation in the United States of a planned community designed after the ideas of Ebenezer Howard's "Garden City" movement. This movement was built on Progressive ideas about standard of living and a response to urban living conditions and the abandonment of the countryside. The designs were in part provoked by seminal Progressive works, including Henry George's *Progress and Poverty* (1881) and Edward Bellamy's *Looking Backward* (1889). Garden City designs provided access to green space and recreational grounds for all residents, which enabled less dense living; the theories and philosophies that grounded the Garden City designs were reactions to the crowded, unhealthy cities of the nineteenth century. In Queens, a short train ride from Manhattan, developers launched a project that came to be known as Sunnyside Gardens that embraced the designs promoted by Howard, and balanced single and multifamily units, green space, recreation space, and a business district in a discrete planned community.

Howard's concepts were adopted and refined by the New York-based Regional Planning Association of America (RPAA), a diverse and significant group that included architects Clarence Stein and Henry Wright, landscape architect Marjorie Sewell Cautley, writers Lewis Mumford and Charles Whittaker, conservationist Benton MacKaye, and real estate developer Alexander Bing. The first practical application of the group's work came with Bing's founding of the City Housing Corporation (CHC), which was created to finance and build Sunnyside Gardens between 1923 and 1928. The CHC employed RPAA members to contribute to the planning and development of Sunnyside Gardens, including Stein, Wright, and Cautley.

The RPAA members used the outcomes from Sunnyside Gardens to develop new intellectual works about architecture and urban planning, home planning ideas, and to refine designs for later developments such as Radburn, NJ. Much of this history is captured in great detail in the New York City Landmarks Commission Designation Report for Sunnyside Gardens from 2007, along with a wealth of other scholarship and works by the designers. The importance of Sunnyside Gardens as a precedent for later designs and as a significant site of experimentation is also referenced in many of the nominations for other similar developments that came after Sunnyside Gardens, including the documentation prepared by you for the Baldwin Hills Village NHL, CA (designated 2003), as well as other NHLs, including Radburn, NJ (designated 2005), Chatham Village, PA (designated 2005), Greenbelt, MD (designated 1996), Greendale, WI (designated 2012), and Greenhills, OH (designated 2016). The contribution of Sunnyside Gardens in the histories of city planning and design has been well established in the documentation for these properties, and as you suggested in the letter of inquiry, this history should be included in the nomination for Sunnyside Gardens.

Today, Sunnyside Gardens is listed on the National Register of Historic Places and designated a New York City landmark. These recognitions capture the significant historical and architectural histories of Sunnyside Gardens and provide a snapshot of integrity at the time of listing or designation. The records provide critical documentation, as well as a baseline for documentation that will be necessary for a NHL nomination. These resources also help with determining an appropriate boundary for the NHL nomination, which should include the key blocks of housing and landscape, and might also include the later apartment building and corresponding commercial corridor. Based on the recent NPS site visit, the overall integrity of the district seems strong, with some minor architectural losses and additions; the original plan, interior courtyards, public spaces, and even many original plantings remain. Any future nomination of Sunnyside Gardens as a historic district will need to fully explain the integrity of the properties and it should include updated photographic documentation with accurate physical description. The boundary justification in the NHL nomination will also need to be fully documented and supported. The NPS NHL program staff will work with you on evaluating this aspect of the district.

In addition, when nominating Sunnyside Gardens, several criteria might be used, but each will need to be fully supported with evidence that demonstrates national significance. All NHL Garden City developments have been designated under Criterion 1, for properties “associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained,” and Criterion 4, for properties that “embody the distinguishing characteristics of an architectural type specimen exceptionally valuable for a study of a period, style or method of construction, or that represent a significant, distinctive and exceptional entity whose components may lack individual distinction.” Similarly, Sunnyside Gardens might be considered eligible under Criterion 1 and 4. Sunnyside Gardens might be eligible under Criterion 1 as the first example in the United States of a planned community adopting progressive ideas of the “Garden City” movement, a moment of experimentation in design and planning that began in England, transplanted in Sunnyside, and evolved in sites like Radburn and later New Deal sites like Greenbelt. Sunnyside Garden might be eligible under Criterion 4 as illustrative of early garden city design. Because Sunnyside Gardens will be designated as a historic district, it might also be eligible under Criterion 5, as a property that is “composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture.”

The documentation for Criterion 1 should also cover the important role of the members of the RPAA. The founding of the group and the contributions of its members at Sunnyside Gardens might be found eligible as nationally significant. The contribution and collaboration of this group as it manifested in Sunnyside Gardens is captured very well in the 2007 local designation, and this research should be incorporated into the NHL documentation. NHL documentation for other related properties mention the RPAA and its members, but focus has largely been on the architects Stein and Wright. In the documentation for Sunnyside Gardens, their contribution should be covered as well as the contribution of Cautley. Additionally, Cautley's role as a woman in design during this period might be significant as a separate area.

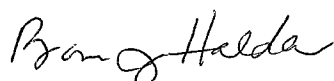
Sunnyside Gardens might also be eligible under Criterion 3. As you are aware, the development of Sunnyside Gardens embodies progressive philosophes about design and planning of the Garden City movement, particularly as it relates to green space and affordable housing. Sunnyside Gardens represents nationally-significant values about housing and standard of living in American society from the Progressive era; the realization of these ideals had profound impact on the next half-century of community planning theory and practice. The intellectual origins and design precedents for Sunnyside Gardens was thoroughly outlined by you in the nomination for the Baldwin Hills Village NHL. However, the intellectual connections between progressive treatises on design and standard of living were successfully demonstrated for Criterion 3 in the NHL nomination for Greenbelt, MD. This designation should serve as a useful comparison if an argument for Criterion 3 for Sunnyside Gardens is also pursued.

Because so many related properties have already been designated, there will be established historical contexts and comparable properties that the nomination for Sunnyside Gardens must include and build upon. As mentioned elsewhere, the nomination for Sunnyside Gardens will need to situate the property within the themes of suburban design and city planning. It should also compare and differentiate the significance and deign of Sunnyside Gardens from the other suburban developments already designated.

During the preparation of nomination, NPS staff can assist with evaluating relevant historical contexts, areas of national significance, evaluation of integrity, and applicable Criterion. In addition, all nomination preparers are encouraged to follow the most recent guidance on preparing nominations, *National Register Bulletin: How to Prepare National Historic Landmark Nominations*.

If you have any questions or need any clarification about the contents of this letter, please contact Amanda Casper, Historian, at [amanda\\_casper@nps.gov](mailto:amanda_casper@nps.gov) or (215) 597-1655. We look forward to reviewing a draft nomination.

Sincerely,



Bonnie J. Halda  
Program Manager, Preservation Assistance

cc: Christopher Hetzel, Program Manager, National Historic Landmarks, NPS, Washington Office  
Rose Harvey, New York State Historic Preservation Officer  
Herbert Reynolds, President, Sunnyside Gardens Preservation Alliance