

ABSTRACT

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PRESERVATION PLANNING IN ASIAN
AND PACIFIC ISLANDER AMERICAN
COMMUNITIES: A CASE STUDY OF
WASHINGTON D. C'S CHINATOWN

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This paper explores current preservation planning practice and how traditional methods of research and survey have underserved Asian and Pacific Islander American communities in preserving both their cultural and historic resources. This paper also provides recommendations to current preservation planning practice to better serve these communities which include addressing the disparity between preservation and urban planning processes and incorporating and changing the way historic context studies and surveys are conducted and applied.

Washington D.C.'s Chinatown was utilized as a case study example to critically analyze how the separation of preservation and planning processes affects the preservation and health of D.C.'s Chinatown.

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By

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Chapter 1: Introduction

Preservation planning is the process of supporting communities by helping to identify their goals, visions, and priorities for their historic and cultural resources.¹ In order to complete these duties, preservation planners are reliant on using historic context studies and surveys to identify and provide context to these historic resources. These documents are not often used outside of the preservation planning sphere, but they provide a potential for other urban planning departments to utilize in their practice in order to create holistic plans that take in account cultural heritage's impact on economic and community development. This paper seeks to expand preservation planning's role in urban planning by analyzing how preservation planning and urban planning processes have impacted Washington D.C.'s Chinatown.

Problem Statement

According to the Pew Research Center Analysis of the U.S. Census Bureau Population Estimates for 2010-2019, both Asian and Pacific Islander Americans (APIA) had increased substantially in population. Asian Americans grew from 10.5 million to 18.9 million and Non-Hawaiian Pacific Islanders grew from 370,000 to 596,000.² These numbers are reflective of the many APIA communities located all across the United States. As these numbers grow, their representation and participation within historic preservation and urban planning processes are vital in order to build better communities and preserve their heritage and culture. However, both of these fields have historically underserved both APIA and other underrepresented communities. Exclusion of these communities from preservation and planning processes have

¹ "Historic Preservation Planning Program," National Parks Service (U.S. Department of the Interior, September 28, 2021), <https://www.nps.gov/subjects/historicpreservationfund/preservation-planning-program.html>

² Abby Budiman and Neil G Ruiz, "Asian Americans Are the Fastest-Growing Racial or Ethnic Group in the U.S.," Pew Research Center (Pew Research Center, April 9, 2021), <https://www.pewresearch.org/fact-tank/2021/04/09/asian-americans-are-the-fastest-growing-racial-or-ethnic-group-in-the-u-s/>.

come in different forms which include promoting redlining practices, deliberate erasure of communities through urban renewal projects, and ignoring the stories of the underrepresented communities. This paper examines how preservation planning can be changed to better support APIA communities by analyzing current preservation planning tools, involvement in the overall planning process, and incorporation of multicultural planning practice by focusing on D.C.'s Chinatown as a case study.

Research Design and Methods

While there are many APIA-ethnic enclaves in the United States, Chinatowns were selected as the primary case study for this research. This was due to the large amount of published data that investigate the relationship between urban planning and Chinatown revitalization. Washington D.C.'s Chinatown was then selected because urban planning and preservation documents were easily accessible for usage in this research. The research approach for this paper was focused analyzing archival documents like historic preservation and urban planning documents created between the years 1989-2019. These documents were used to understand how preservation and planning processes in D.C. have treated Chinatown over the years by looking at long-term goals, objectives, and visions slated for Chinatown development. (See **Appendix A. Table 1**).

Research Questions

1. How have preservation planners supported APIA and other communities of color?
2. What is the impact of historic preservation and urban planning in APIA communities?
3. How has Washington D.C.'s Chinatown been impacted by these planning decisions and what changes should be made to better support the community?

In order to answer the research questions, this paper was broken down in three phases:

Phase 1: Overview of Preservation Planning

This part of the paper looked at how preservation planning was defined as a professional field and what tools were utilized by planners in order to complete their duties. These tools were then analyzed for their efficiency in preserving underrepresented communities and recommendations were made to better these tools and preservation planning processes.

Phase 2: Historic Preservation and APIA Heritage

After addressing the duties and tools of preservation planners, it was important to understand how APIA communities are represented in the historic preservation process. This included looking into the history and criteria requirements of the National Register of Historic Places (NR) and other published works that related to APIA-related heritage sites.

Phase 3: Washington D.C. Document Analysis

There were two major document types used for research: urban planning and historic preservation. Washington D.C. has different sub-categories for these documents, and each vary in their purpose and legal power. (see Table 1 and Appendix A. Table 2) Many preservation and planning documents were focused on general areas. As a result, plans were selected if they included these keywords because it indicated the plan was either related to an area near Chinatown or directly impacted Chinatown itself.:

- Washington D.C
- Central Washington
- Ward 2
- Downtown Area
- The Downtown Historic District
- Chinatown

Document Name	Type	Purpose
Comprehensive Plan	Urban	Legislative documents that guide public policies and sets long term goals, visions, and key actions for a community. The typical Comprehensive plan lasts 5-30 years.
Policy Frameworks/Guidelines, Small Area Plans	Urban	Documents that guide actions to meet the goals of the comprehensive plan but hold no legal power.
Historic Preservation Master Plan	Preservation	Outline of preservation planning activities and includes goals, and visions pertaining to historic resources.
D.C. Inventory of Historic Sites Form	Preservation	Nomination forms that list properties into the D.C. Inventory of Historic Sites.
National Register of Historic Places Nomination Form	Preservation	Nomination forms that list properties or districts into the National Register of Historic Places.

Table 1. Types of D.C. Government Documents

Each plan was then analyzed for their visions, objectives, and goals that impacted or included Chinatown. Recommendations for improving preservation planning in Chinatowns were then made based on the language used in these plans and outcomes that were reported. Additional case study examples that showed successful preservation planning processes were also included in the recommendations.

Limitations in Research

Interviews with D.C. preservation planners were not conducted due to the time constraints presented for this paper. Some historic preservation and urban planning documents were also not made available online and/or required in-person visits which were not feasible due to the COVID-19 pandemic.

The following chapter will be a brief introduction in explaining the basis of preservation practice and how traditional research processes and methods have provided to be a barrier for APIA representation in local preservation planning practice.

Chapter 2: Changing the Way Preservation Planning Works

Defining Preservation Planning

Preservation planning, as defined by the National Park Service is the process of helping communities identify their goals, visions, and priorities for the preservation of their historic and cultural resources.³ In order to complete these duties, preservation planners are often responsible for:

- Conducting historic context studies and historic resource surveys which include identifying, evaluating, and nominating historic properties onto local, state, and national historic registries.
- Administrating of local historic tax credit, code-enforcement, work area permits and easement programs which include technical assistance.
- Complying with Section 106, Section 4f, National Environmental Protection Act when applicable.
- Providing resources and support for communities interested in historic preservation.
- Maintaining archival libraries for local histories and historic properties/district registries.
- Assisting in Historic Preservation Commission hearings.
- Providing resources, guidance, and support for zoning decisions related to historic preservation and helping with research requests from other planning departments.

Addressing the Issues with Historic Context Studies and Surveys

While there are many duties that a preservation planner does, the most important component of preservation planning is conducting historic context studies and surveys. Historic context studies are documents that guide and provide background information for historic

³ National Park Service, *Preservation Planning Standard*.

resource surveys by identifying important trends and patterns in order make connections between the historic property and the built environment.⁴ Historic resource surveys are documents that identify, evaluate, and record historic properties and are usually utilized in the urban planning process and other regulatory procedures.⁵ Together, these two documents are used to evaluate, identify, and nominate a property into some type of historic property registry.

These historic contexts studies and surveys are also meant to be used for land-use planning purposes which include historic district zoning, historic property designation, implementation of conservation zones, work area permits, historic preservation master plans and local urban planning process.⁶ The reality is that historic context studies and surveys may not always be utilized for urban planning processes that do not directly impact historic resources. All urban planning departments differ in their usage of historic context studies and surveys for designing comprehensive and local plans; some may become a part of the planning process or excluded entirely.⁷

In addition to this, historic context surveys and studies are often reliant on traditional preservation processes. They may be conducted by preservation planners themselves or contracted out to consultants. While there are multiple guidelines for conducting historic context surveys and studies, they are not adapted to recognizing heritage and cultural sites related to APIAs or take into the consideration the amount of time and funding required to do so. For instance, historic context surveys are typically conducted as a windshield survey which is taking

⁴ Historic Resources Group, "California Preservation Foundation Historic Context Statements," PowerPoint. December 4, 2015. https://californiapreservation.org/wp-content/uploads/2015/12/4PaulTravis-Contexts_2016-HRG.pdf

⁵ "Historic Contexts & Resource Surveys," California State Parks: Office of Historic Preservation (California State Parks), accessed December 12, 2021, https://ohp.parks.ca.gov/?page_id=23317.

⁶ Ibid.

Barbara Wyatt, "The Components of a Historic Context," A National Register White Paper, April 9, 2009, 2.

⁷ Based on five informational interviews with preservation planners on the East Coast and Mid-west.

observations of the physical landscape of a community or area. This would not be an ideal method to survey APIA heritage because national and local policies have barred APIAs from settling into communities or they have been displaced.⁸ Additionally, if the surveyor is not a part of the community that is being studied or done their due diligence in interacting with the community, they might overlook places that appear ordinary but are full of rich cultural heritage underneath. Historic context statements are also reliant on archival and published materials which may not be available. Traditional archives housed in universities and libraries sometimes do not have the materials due to the lack of donations or lack of funding, space, or staff to address the disparity in materials relating to underrepresented communities.⁹ There are additional issues with representation in archives which include misrepresentation and past histories of deliberate exclusion from repositories.¹⁰ When traditional methods of research fail to be inclusive of underrepresented communities, it has an impact on the type of surveys and context studies that are created.

There are no data currently available that document how many historic context studies and surveys have focused on the heritage of APIA communities. On a surface level (based on what is publicly available), there have been at least ten studies that conducted for APIA heritage in the past 20 years, with a few others that have not been completed or published.¹¹

⁸ Michelle Magalong, and Dawn Mabalon. "Cultural Preservation Policy and Asian Americans and Pacific Islanders: Reimagining Historic Preservation in Asian American and Pacific Islander Communities." *AAPI Nexus Journal: Policy, Practice, and Community* 14 (January 1, 2016): 105–116. https://doi.org/10.36650/nexus14.2_105-116_MagalongMabalon.

⁹ Julia Corrin, Emily Davis and Heidi Wiren Barlett, "Our Heart is in the Work: Exploring Honesty and Absence in Archives." *Mid-Atlantic Archivist*. (Sept 2020): 2-3.

¹⁰ Michelle Caswell, and et. al. "To Be Able to Imagine Otherwise': Community Archives and the Importance of Representation." *Archives and Records* 38, no. 1 (January 2, 2017): 5–26. <https://doi.org/10.1080/23257962.2016.1260445>.

¹¹ These studies include: Survey L.A's Asian Americans Context Studies (2018), Asian and Pacific Islander Communities in California (2020), Chinese Americans in the City of Boston (2016), Chinese Americans in Riverside, California, (2016), Japanese Americans in Riverside (2011), Japantown, San Francisco (2011) and few others like the Chinese Americans in San Francisco, California.

Underrepresentation of APIA communities in historic preservation is a prevalent issue in the field that must be addressed on local, state, and national levels. Historic context studies and surveys provide an opportunity for underrepresented communities to become the authors of their own official history. They can also expediate important cultural heritage sites and properties into local historic registries to protect important sites from development as well if there is a design review board established in the community.¹² Communities can also benefit from historic preservation programs and activities like heritage tourism, climate change mitigation from adaptive-reuse, affordable housing, and other activities. In order for preservation planning to fully address issues that APIA communities face in cultural preservation, a comprehensive approach must be utilized that includes other facets of urban planning practice.

Separation within Planning Departments

Preservation planning is technically a part of the urban planning process because historic preservation is often written as a regulatory requirement in local government ordinances and statutes. This regulatory role includes the processing of National Register nominations and complying with Section 106 and Section 4f reviews which are processes that evaluate federally funded projects for their impact on potential historic sites. Preservation is also typically housed within the planning department, but this does not mean preservationists work with planners on all projects outside of regulatory duties and they are often relegated as the last option in the planning process before major changes to plans can be made.¹³ Preservation planners should be considered a part of the early planning process in order to avoid common problems that arise

¹² Fred Stachura, "Lecture 5, Protecting Historic Resources from Government Action", HISP640, March 2020. University of Maryland, College Park. Lecture.

¹³ Jeremy, Wells. "Pervasive Preservation: Redefining the Role and Placement of the Preservation Commission in Local Government" Nov-Dec (November 1, 2011).

from the urban planning process when decisions are made without realizing they impact historic or cultural resources that are important to the community.¹⁴

Preservation planners have the potential to integrate with different parts of the planning department because their duties are inter-related, for instance the designation of historic districts impact zoning departments.¹⁵ Documents like historic context studies and surveys provide more than background information and nomination of properties into local registries. They can be potentially used in economic, environmental, and community planning departments in different ways. (Figure 1).

¹⁴ Ken Bernstein, and Janet Hansen. "SurveyLA: Linking Historic Resources Surveys to Local Planning." *Journal of the American Planning Association* 82, no. 2 (April 2, 2016): 88–91. <https://doi.org/10.1080/01944363.2015.1137199>.

¹⁵ Wells, *Pervasive Preservation*, 5.

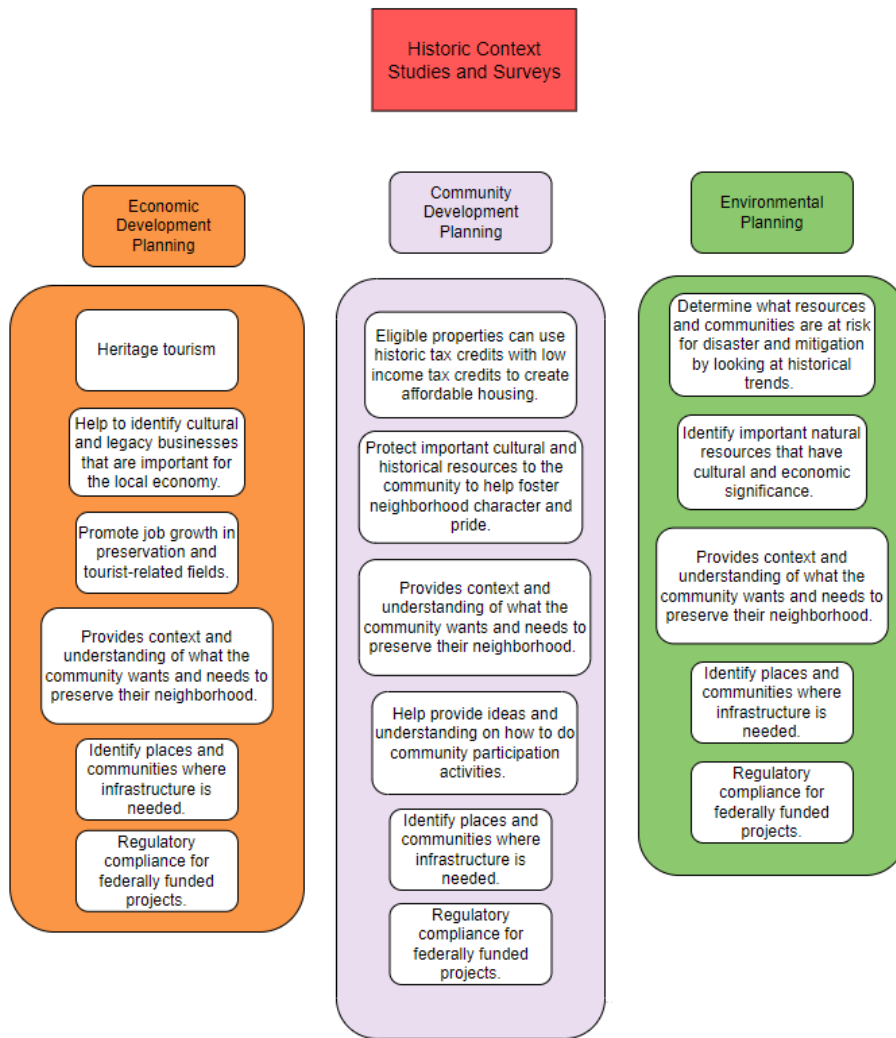


Figure 1. Diagram of how historic context and surveys can be incorporated into different planning departments.

Chapter 3: Planning and Preservation Implications for APIA Communities

There is a plethora of social and economic issues that plague APIA communities. This section focused on three major issues that were commonly seen throughout the research process: affordable housing, economic revitalization, and representation.

Affordable Housing

Historic preservation is an interdisciplinary field that covers not just the protection of cultural resources but also helps to provide economic and cultural benefits for local communities. The economic benefits of historic preservation ranges from heritage tourism, tax/grant benefits, local economy revitalization, and affordable housing APIA communities located in urban areas like Chinatowns often face issues with finding affordable housing due to the high costs of living and real estate market. Historic preservation can be helpful retaining lower affordable housing for these communities by helping to re-adapt existing historic structures into affordable housing or rehabbing existing apartment buildings with the combination of Historic Tax Credits (HTC) and Low-Income Housing Tax Credits (LIHTC). The National Park Service reported in 2016 that about half of all HTC projects were related to housing in some form, and between 1978-2016 there were 549,005 housing units created.¹⁶

Economic Revitalization

Local economic revitalization from preservation comes in many different forms. The San Francisco Legacy Bars and Restaurants Initiative is one such example that directly helps local businesses. It began in 2015 in order to bring public awareness of businesses that contributed to the cultural heritage in San Francisco and later expanded to the San Francisco Legacy Business

¹⁶ Rep. *Annual Report on the Economic Impact of the Federal Historic Tax Credit for FY 2016*, n.d. <https://www.nps.gov/tps/tax-incentives/taxdocs/economic-impact-2016.pdf>.

Historical Preservation Fund.¹⁷ In order to combat against displacement for businesses that rent their properties, the fund provides grants to landlords who are willing to commit to long-term leases. The National Trust for Historic Places' (NTHP) Main Street program is a well-known national program which fosters historic preservation as a component as a tool for local community revitalization. The NTHP released a report in 2020 that for every dollar invested in preservation activities, \$18.90 is generated for the local economy, and 687,321 jobs were gained nation-wide.¹⁸ In addition to being economically beneficial, there are cultural benefits that come with preservation.

Historic preservation that is diverse and inclusive helps to shed light on the ways that underrepresented communities have been disenfranchised by public institutions and bring opportunities to reflect and make public these stories that have been erased from mainstream history.¹⁹ The NTHP's Sites of Enslavement Initiative (SHINE) is one of many programs that focuses on re-interpretation of historic slave sites in order to shed light on the lives of the enslaved and bring clearer narratives of their impact on American history as previous interpretations had focused on dominant white narratives.²⁰ Historic preservation is a component of public education, and diverse and inclusive preservation helps to reduces biases in national history.²¹

¹⁷ "Legacy Business Registry," City and County of San Francisco: Office of Small Business (City and County of San Francisco), accessed December 13, 2021, <https://sfosb.org/legacy-business>.

¹⁸ "Reinvestment on the Rise," Main Street America (Main Street America), accessed December 13, 2021, <https://www.mainstreet.org/mainstreetimpact>.

¹⁹ Erica Avrami, "Preservation's Reckoning," in *Preservation and Social Inclusion*, vol. 2 (New York, NY: Columbia University Press, 2020), <https://www.arch.columbia.edu/books/reader/503-preservation-and-social-inclusion#reader-anchor-0>.

²⁰ "Reconsidering Celebrations at Sites of Enslavement," National Trust for Historic Preservation (National Trust for Historic Preservation), accessed December 13, 2021, <https://savingplaces.org/reconsidering-celebrations>.

²¹ Franklin Odo, "Introduction: Asian Americans and Pacific Islander Americans Revisited: An Introduction to the National Historic Landmarks Theme Study," in *Finding a Path Forward, Asian American and Pacific Islander National Historic Landmarks Theme Study* (Washington, D.C.: National Park Service, 2017), pp. 1-15, <https://www.nps.gov/articles/upload/00-Introduction.pdf>.

Representation

Places are not just physical landscapes but provide people an emotional connection to the environment because of shared experiences and memories with the community that lives there.²² Historic preservation is a tool that can be utilized to protect these valuable spaces. Local designations provide the strongest form of protection for historic properties through local design review boards that require permit processes for demolition or alteration.²³ National Register designation does not provide protections from demolition or alterations, and primarily serves as an honorary title unless federal funds are involved.²⁴ Official listings and protections of APIA-related heritage sites are also important for future generations to understand their importance in the history of the United States.²⁵ On smaller scales, community organizations have utilized common preservation tools like archiving, cultural maps/event, social media platforms, and oral history projects in order to preserve their culture and history in the wake of rapid urbanization. Many APIA and other communities have recognized the connections between urban planning, preservation, and cultural development and have been actively involved in these processes.

These examples include:

²² Tom Mayes, “Why Do Old Places Matter? Community,” Preservation Leadership Forum (National Trust for Historic Preservation, March 10, 2015), <https://forum.savingplaces.org/blogs/forum-online/2015/03/10/why-do-old-places-matter-community>.

²³ “Local Preservation Laws,” Preservation Leadership Forum (National Trust for Historic Preservation), accessed December 13, 2021, <https://forum.savingplaces.org/learn/fundamentals/preservation-law/local-laws#:~:text=Historic%20preservation%20ordinances%20offer%20the,commission%2C%20or%20other%20administrative%20body>.

²⁴ “FAQs,” National Register of Historic Places (National Parks Service, September 23, 2021), <https://www.nps.gov/subjects/nationalregister/faqs.htm#:~:text=Under%20Federal%20Law%2C%20the%20listing,usually%20funding%20or%20licensing%2Fpermitting>.

²⁵ Odo, *Introduction*, 13.

- **The Little Tokyo Community Impact Fund** - An initiative started by the Little Tokyo community to combat against rising real-estate value and keep rent affordable for local businesses.²⁶
- **The Boston Chinatown Community Land Trust** – Boston’s Chinatown leaders have looked at community land trust models in order to acquire property for community use as rising real estate has displaced community members and organizations.²⁷ They have also worked with city planners to develop the Chinatown Master Plan 2020.²⁸
- **Chinatown Working Group** – Community and activists in Manhattan’s Chinatown formed their own working group to develop a Master plan to revitalize and preservation Chinatown.²⁹

There has also been few large scale studies that have explored the land-use policies of Chinatowns, such as one that was released in 2013 by the Asian American Legal Defense and Education Fund.³⁰ It was discovered that luxury development (hotels, condos, upscale services) had severely contributed to the decline of Boston, Philadelphia, and New York’s Chinatowns.³¹ The erasure of APIA ethnic enclaves from city centers due to urban planning decisions has spurred the need for the usage of historic preservation to prevent displacement by focusing on preserving cultural heritage through festivals, oral histories, and other community activities.

²⁶ “Mission,” Little Tokyo Community Impact Fund, accessed December 13, 2021, <http://littletokyocif.com/>.

²⁷ “Our Mission” Chinatown Community Land Trust, accessed December 13, 2021, <https://chinatownclt.org/>

²⁸ Lydia Lowe, “Chinatown Master Plan 2020 Covers a Broad Spectrum of Future Development and Community Needs,” Sampan (Sampan, August 21, 2020), <https://sampan.org/2020/boston/chinatown-master-plan-2020-covers-a-broad-spectrum-of-future-development-and-community-needs/>.

²⁹ Pratt Center for Community Development and The Collective for Community, Culture and the Environment, December 2013, https://fe57a06d-3226-42a3-8025-fc62e60ce73b.filesusr.com/ugd/51a3f2_6e8064c546d14ee2a96c05a6ee7b2636.pdf.

³⁰ Bethany Y Li, Domenic Vitiello, and Arthur Acoca, “Chinatown Then and Now” (Asian American Legal Defense and Education Fund, June 2013), <https://www.aaldef.org/uploads/pdf/Chinatown%20Then%20and%20Now%20AALDEF.pdf>.

³¹ Yi and et.al, *Chinatown Then and Now*, 2-4.

Historic preservation and urban planning have the potential to address social, economic, and environmental concerns of APIA ethnic enclaves by utilizing heritage and culture as the basis of revitalization. Historic preservation and urban planning cannot fully serve communities as standalones; each field must understand how heritage and culture is important for community development and how to utilize heritage and culture in a manner that is both respectful and does not commodify them as economic resources. While APIA communities have already made the connections between the two fields, many government entities have chosen to keep these processes separate which can have detrimental effects on the community as seen in Washington D.C.'s Chinatown.

Chapter 4: APIA Representation on the National Register of Historic Places

National Register of Historic Places

The Historic Preservation Act of 1966 had done two things: it mandated that all federally funded projects undergo an environmental review for development that may impact known/unknown historic sites, and the second was to build public awareness and knowledge of American heritage which would later become a registry called the National Register of Historic Places (National Register).³² The National Register is list of properties and sites that are deemed historically significant to the history of the United States but it does not serve as a form of protection from demolition, impede use of a property, or prevent alterations to buildings. There are over 95,000 properties listed on the National Register yet underrepresented communities represent a small percentage of listings. In 2004, it was reported that 3% of all total listings related to African American, Asian American, and Hispanic heritage.³³ Sixteen years later, the 2020 Congressional Research Report Overview on the Federal Role in Historic Preservation (2020) reported that prior to FY 2014, only 8% of all total listings on the National Register related to African American, Asian American, American Indian, Latino, and other minorities.³⁴ While it appears that the numbers have risen by 5%, it's important to note that the 2014 statistic includes American Indian and other minorities in their numbers compared to the 2004 statistic which includes only three minority groups. These statistics also do not account for the fact that the National Park Service has not re-evaluated listings for potential significance with ethnic and racial histories.

³²“National Register of Historic Places Brochure,” *National Register of Historic Places Brochure* (Washington, D.C.: National Park Service, n.d.),

https://www.nps.gov/subjects/nationalregister/upload/NR_Brochure_Poster_web508.pdf.

³³ Ned, Kaufman. “Historic Places and the Diversity Deficit in Heritage Conservation.” National Parks Service. U.S. Department of the Interior, 2004. <https://home1.nps.gov/CRMJournal/summer2004/article3.html>.

³⁴ Congressional Research Service. *The Federal Role in Historic Preservation: An Overview*. by Mark K. DeSantis. R45800. Washington, D.C. PDF. 2020, <https://fas.org/sgp/crs/misc/R45800.pdf>

The lack of listings related to underrepresented groups on the National Register is an issue that must be addressed considering that APIAs have existed in the United States as early as the seventeenth century with the arrival of Filipino sailors through the Manilla Galleon Trade.³⁵ The early twentieth century brought large influxes of Chinese, Japanese, Indian, and Korean laborers who created early APIA settlements in the U.S. as they came for job opportunities in gold mining, railroad, agricultural, fishing, and manufacturing industries.³⁶ By 2021, APIAs have become a diverse group of over 35 ethnicities and make up more than 7% of the total U.S. population.³⁷ They have contributed significantly to the United States economically, politically, and culturally for over 200 years but are not well-represented for these contributions in historic preservation.

Underrepresentation is not a new issue in the field of preservation. In 1991, the National Preservation Conference focused on emphasizing the need for diversity within preservation as U.S. demographics were changing rapidly, but 30 years later, diversity and inclusion still remains an issue for the field today.³⁸ While there have been changes in the field to become more inclusive – like the creation of the Asian and Pacific Islander Americans in Historic Preservation (APIAHiP), a national non-profit organization formed in 2007, and trending focus on APIA heritage in state and local historic context studies, much work has yet to be done. The problem in

³⁵ Gary Y Okihiro, “Essay 1: Imperialism and Migration,” in *Finding a Path Forward, Asian American and Pacific Islander National Historic Landmarks Theme Study*, ed. Franklin Odo (Washington, D.C.: National Historic Landmarks Program, National Park Service, U.S. Department of the Interior, 2017), <https://www.nps.gov/articles/aapi-theme-study-imperialism-and-migration.htm>.

³⁶ Erika Lee, “Essay 4: Immigration, Exclusion, and Resistance, 1800-1940s,” in *Finding a Path Forward, Asian American and Pacific Islander National Historic Landmarks Theme Study*, ed. Franklin Odo (Washington, D.C.: National Historic Landmarks Program, National Park Service, U.S. Department of the Interior, 2017), <https://www.nps.gov/articles/aapi-theme-study-essay-4-immigration.htm>.

³⁷ Abby Budiman and Neil G Ruiz, “Key Facts about Asian Americans, a Diverse and Growing Population,” Pew Research Center (Pew Research Center, April 29, 2021), <https://www.pewresearch.org/fact-tank/2021/04/29/key-facts-about-asian-americans/>.

³⁸ Antoinette J Lee, “The Social and Ethnic Dimensions of Historic Preservation,” in *A Richer Heritage: Historic Preservation in the Twenty-First Century*, ed. Robert E. Stipe (Chapel Hill, NC: University of North Carolina Press, 2003), pp. 385-404.

the lack of representation lies preservation policies that exclude underrepresented communities and the way APIAs have been treated historically that bar them from the preservation process.

Barriers in APIA Preservation

To better understand the barriers that historic preservation poses for APIA communities, its important explain the basis of orthodox preservation practice. The primary aim of preservation is to document and list properties that are historically significant. Historic properties are evaluated for significance under four major criteria:

- Criterion A – Sites that associated with events that contribute to broad patterns of history
- Criterion B- Sites associated with significant persons
- Criterion C – Sites of architectural or craft significance
- Criterion D – Sites that may yield important prehistoric or historic information

Properties are further evaluated for integrity. The seven aspects of integrity were incorporated into the National Register criteria in the late 1960s.³⁹

1. Location – is the site in the original location?
2. Design – is the design significant?
3. Setting – does the physical environment continue to contribute to its significance?
4. Material – are the same materials retained?
5. Workmanship – is the craftsmanship particular of one culture?
6. Feeling – does the site feel like it’s historic character?
7. Association - does the property have association with the important event/person?

³⁹ John H. Sprinkle, *Crafting Preservation Criteria: The National Register of Historic Places and American Historic Preservation* (New York, NY: Routledge, 2014).

These criteria and aspects of integrity have not been revised since 1977 are not well-adapted to the major changes in the cultural values, economy, politics, urbanization, and climate change occurring in the United States today.⁴⁰ The integrity evaluation in particular is the strongest barrier for APIA communities. Location, design, setting, material, workmanship are evaluations meant for physical sites that are intact. While APIA communities have long existed in the United States, institutional racism like redlining, racial covenants, alien land laws, naturalization laws, segregation are all practices that have prevented APIA communities from establishing physical roots.⁴¹ Many APIA communities are also centered in urban landscapes which compromise their integrity.⁴² Rising real estate costs, tenancy, and unfavorable land development are factors that force the movement of APIA communities from their homes. It also does not help that traditional preservation focuses on how the market affects physical buildings without being concerned about the community who have contributed to the meaning of places.⁴³ Little Tokyo in Los Angeles and Chinatown in Manhattan are two examples of APIA communities that have reduced in physical size and population as urban development prices businesses and people out of the area. Thus, these criteria that require historic sites to focus heavily on physical integrity in order to be considered culturally significant excludes communities who have consistently been disenfranchised from owning and maintaining property. The last two evaluations, feeling and association are not dependent on tangibility, but the National Park Service specifically stipulates that these two aspects cannot be standalone for

⁴⁰ Patrice Frey, "Why Historic Preservation Needs a New Approach," Bloomberg City Lab (Bloomberg, February 8, 2019), <https://www.bloomberg.com/news/articles/2019-02-08/why-historic-preservation-needs-a-new-approach>.

⁴¹ Magalong and Mabalon, *Cultural Preservation Policy*, 106-7.

⁴² Sprinkle, *Crafting Preservation Criteria*, 57.

⁴³ Vicki Weiner, "Historic Preservation and Community Development: Past and Future Synergies," in *Preservation and Social Inclusion*, ed. Erica Avrami, vol. 2 (New York, NY: Columbia University Press, 2020). <https://www.arch.columbia.edu/books/reader/503-preservation-and-social-inclusion>.

the designation of a property.⁴⁴ Some state historic preservation offices may also require certified local governments to have local registry criteria similar to National Register criteria standards which bars APIA communities from being able to have local designation.⁴⁵

There is another important unofficial criterion that impacts preservation: Criterion “P”. Criterion P, or politics plays an important role of determining what constitutes a historic place and what is protected.⁴⁶ These politics can come from national, state, and local governments and the community. Successful preservation requires a strong political force. Breakthroughs in the preservation of underrepresented communities have come from political leaders like Secretary of Interior Ken Salazar who focused on initiatives relating to minority history during his office. Salazar was one of the first leaders in preservation to promote theme studies such as *the Latino Heritage Theme Study* in 2011.⁴⁷ Theme studies are designed to provide national historic context for a certain topic in order to help expediate the identification and nomination of historic properties while additionally providing information to encourage different interpretations of place and to diversify the type of properties that could be recognized as historically significant.⁴⁸ The success of this theme study had led to other studies for other underrepresented groups like the *Finding a Path Forward: Asian American/Pacific Islander National Historic Landmarks Theme Study* released in 2017.⁴⁹ These actions have trickled down to state and local levels where

⁴⁴ National Park Service, “How to Apply the National Register Criteria for Evaluation”, National Park Service. Washington D.C., 1990. https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf

⁴⁵ For instance, the State of Maryland Historic Preservation Office requires certified local governments to have local registry criteria that are substantially similar to those of the National Register.

⁴⁶ Sprinkles, *Crafting Preservation*, 5.

⁴⁷ Laura Dominguez, and Sarah Zenaida Gould. “American Latinos and the Making of the United States: A Theme Study.” *Journal of American History* 106, no. 3 (December 2019): 696–703. <https://doi.org/10.1093/jahist/jaz508>.

⁴⁸ Dominguez and Gould, American Latinos, 698-699.

⁴⁹ Dominguez and Gould, American Latinos, 698-699.

similar context studies for underrepresented heritage have increased in the past decade.⁵⁰ State and local politics in the form of urban planning also impede the preservation process as seen in Washington D.C.'s Chinatown.

⁵⁰ Many examples include the Asian Americans in D.C. Context Study (2021), Asian Americans in Maryland Context Study (2021), Asian Americans in Montgomery County, Maryland (2021), African Americans in Howard County (2021), Chinese Americans in Riverside (2018) and many more.

Chapter 5: Washington D.C.'s Chinatown

Background Context on D.C.'s Chinatown

D.C.'s Chinatown can be traced back as early as the 1870s, when the first Chinese immigrants were recorded living in the area.⁵¹ The small community flourished over the years, and became established alongside Pennsylvania Avenue NW. By 1929, the area was home to a small Chinatown, with restaurants, laundries and other small Chinese-owned businesses. Unfortunately, this first Chinatown would be displaced by the 1929 Federal Triangle Project, a government-sponsored project designed to reorient federal and cultural institutions into one place in the city.⁵² Community organizations like the Hip Song Tong and On Leong Tong found a new place for the Chinatown to move into; H-Street where it would remain until urban renewal projects like the old Washington Convention Center (1983) and the Verizon Center (1997) would force the displacement of several Chinatown businesses and residents as well as spur gentrification. Other factors leading to the decline of Chinatown included the lack of social services (i.e., grocery stores, family-oriented businesses), affordable housing options, and better opportunities in the DC suburbs.⁵³

Throughout the research, it was clear that there were three major themes: aesthetic and architectural design, commercial interests, and community development across both urban planning and historic preservation documents.

⁵¹ Campbell Gibson and Kay Jung, "Population Division. Historical Census Statistics on Population Totals by Race, 1790-1990, and by Hispanic Origin, 1970-1990, for the United States, Regions, Divisions, and States" (Washington, DC: U.S. Census Bureau, 2002), pp. 1-177. <https://www.census.gov/content/dam/Census/library/working-papers/2002/demo/POP-twps0056.pdf>

⁵² D.C. Office of Planning, *Chinatown Cultural Development Small Area Plan*. Washington D.C.: Office of Planning, 2009. <https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/Chinatown%20Cultural%20Development%20Small%20Area%20Action%20Plan.pdf>

⁵³ Howard Marano, "There's Disagreement about the Boundaries of DC's Chinatown," Greater Greater Washington, February 13, 2019, <https://ggwash.org/view/70921/where-is-dcs-chinatown-anyway>.

Aesthetic and Architectural Design

The focus on aesthetic and architectural design was prevalent in early historic preservation documents relating to Chinatown. Both the D.C. Inventory of Historic Sites and NRHP nomination forms for the Downtown Historic District focus on both the commercial and architectural significance of downtown D.C. The nomination had included parts of Chinatown and had primarily focused on 19th century commercial and residential vernacular styles which excluded the aesthetic of the Chinatown. In fact, in regards to Chinatown's architectural inclusion into the district, the author notes that "Although a number of structures have undergone major renovations which have obscured, the original character of the building behind pagoda-like facades, most of the Chinese elements are minor elements that do not destroy the character of the buildings on which they appear. Such elements, as long as they are reversible and do not significantly obscure the façade of the building, should not be discouraged."⁵⁴ In other words, Chinatown's architectural significance in the historic district was based on the fact that its' buildings' structures were original 19th century commercial buildings and that the Chinese elements could be removed. This tone of promoting 19th century architecture over oriental elements would later change in the Downtown Historic District boundary increase application submitted in 2013.

The Downtown Historic District boundary increase was a targeted goal of the Historic Preservation Plan of 2016 which otherwise also focused on refining the guidelines of the Chinatown (presumably the design guidelines that were later released in 2017).⁵⁵ The DC

⁵⁴ Tanya Edwards Beauchamp, "Downtown Historic District" National Register of Historic Places Nomination Form. Historic Preservation Division, Department of Consumer & Regulatory Affairs, Washington D.C. June 1983. <https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/Downtown%20HD%20nom.pdf>

⁵⁵ D.C. Historic Preservation Office, *Historic Preservation Plan 2016*. Washington D.C.: Office of Planning, 2016. https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/2016%20DC%20Historic%20Preservation%20Plan_0.pdf

Preservation League had authored and submitted the historic district boundary increase to the NRHP and DC Inventory of Historic Inventories in order to change the boundaries of the Downtown Historic District to include the rest of the Chinatown and other areas. Instead of focusing on 19th century architecture, the nomination form explicitly states that buildings of significance in Chinatown were important for their Chinese elements and that Chinatown's relation to the growth and development of the Chinese community itself was historically and cultural significant to the history of DC.⁵⁶ This is quite different from the original NRHP form that focused on the importance of European styled-architectural, and shows a shift in attitude within preservation as to what type of aesthetic is deemed historic.

Drawing back to urban planning documents, the earliest document relating to Chinatown's aesthetic was released in 1989, four years after the downtown DC was approved for historic district status. The Chinatown Design Guidelines was published by the D.C. Office of Planning. These design guidelines were developed by AEPA, who would later design both the Wah Luck House and Friendship Arch; both prominent building structures standing in Chinatown today.⁵⁷ The general gist of the design guidelines was the encouragement of using Chinese-styled landscaping and architectural design in order to stimulate heritage tourism, nightlife productivity, and to turn Chinatown into a family-centered entertainment/leisure area.⁵⁸ None of these guidelines focused on using urban design as a means to revitalize the community

⁵⁶ D.C. Preservation League, "Downtown Historic District (Boundary Increase)" D.C. Inventory of Historic Properties Nomination Form. D.C. Preservation League, Washington D.C. Jan 2013.
<https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/Downtown%20expansion%20NOM%20COMPLETE.pdf>

⁵⁷ Both buildings are considered one of the few remaining cultural institutions of Chinatown.

⁵⁸ D.C. Office of Planning, *Chinatown Design Guidelines*. Washington D.C.: Office of Planning 1989.
https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/chinatown_design_guidelines_study.pdf

itself, but rather leaned toward using urban design as a means to stimulate economic development. Evidentially, this sentiment was repeated in later design guidelines.

The Chinatown Design Guide Study was released in 2017 and was later amended in 2019. The updated guidelines were published in order to provide clarity and guidance for businesses who plan to do building renovations and/or new construction projects within the Chinatown boundaries. The only major change between this document and the original Chinatown Design Guidelines (1989) was the way design applications were submitted and approved by the D.C. Office of Planning and Historic Preservation. The Chinatown Steering Committee (responsible for cultural, language and design input) would be able to provide oversight and interject their opinions on design applications.⁵⁹ Although the committee is able to provide opinions, their advisory role meant that their opinions are not the final say in applications and could be overruled by the DC design review board. In summary, the Chinatown Design Guide Study (2017) is no different from the Chinatown Design Guidelines (1989) because the overall goal is to create a Chinatown aesthetic that promotes commercial activity and rather than to create a sense of home for current residents. Both guidelines' audiences are not meant for residents but for businesses owners who need to use Chinese elements in order to conform with city regulations that require Chinese aesthetic in Chinatown. Throughout the years, Chinatown's design and aesthetic has been valued for its marketability to visitors rather than focusing on how the design is relevant and important for the residents. This is evident throughout planning and preservation documents that have looked primarily into heritage tourism as a

⁵⁹ D.C. Office of Planning, *Chinatown Design Guide Study*. Washington D.C.: Office of Planning 2019. https://planning.dc.gov/sites/default/files/dc/sites/op/page_content/attachments/CDG%20FINAL%20REDUCED.pdf

method to redevelop the overall Chinatown into a commercial and entertainment center alongside downtown DC.

Commercial Interests

As a part of downtown DC, Chinatown is subjected to any goals and action plans related to the area. The 1984 Comprehensive Plan had focused on developing downtown DC as a focal point for the city while also turning the Chinatown and Gallery-Place areas as a city center with retail uses.⁶⁰ These goals resulted in subsequent urban planning documents to focus on entertainment and commercial development. By 2000, Chinatown was considered to be a transition neighborhood that had yet to achieve their full entertainment/retail potential and was consistently referenced for its value as a cultural and retail experience.⁶¹

The idea of Chinatown as a commercial and entertainment center prevailed throughout the 2006 Comprehensive Plan Update for the National Capital. This plan had included provisions such as sustaining the Chinatown area by retaining and enhancing affordable housing, community, cultural facilities, promoting street facilities and wholesale retailers and hotels.⁶² But also stated that Chinatown should also be enhanced in its "...role as a destination for residents and workers from the District and surrounding jurisdictions, as well as leisure and business visitors."⁶³ Even though Chinatown is highlighted as an area that needs support for sustaining its local community, the overall plan emphasis that Chinatown needs to consider how important it is

⁶⁰ D.C. Office of Planning. *Volume 2, Area Elements, Central Washington*. Washington D.C.: Office of Planning, 2006.

https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/District%20Elements_Volume%20II_Chapter%2016_April%208%202011.pdf

⁶¹ D.C. Office of Planning. *Downtown Area Action Agenda*. Washington D.C.: Office of Planning, 2000.

https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/Downtown%20Action%20Agenda%20Compiled_web.pdf

⁶² D.C. Office of Planning, *Central Washington*, 30-31.

⁶³ D.C. Office of Planning, *Central Washington*, 31.

for tourism and that economic development from tourism is beneficial for preserving local businesses. The plan does not talk about how tourism can be used to help in other areas of social problems besides businesses development.

Heritage tourism within historic preservation is seen differently from urban planning documents. Earliest mentions of historic preservation as a major goal for downtown DC does not become relevant until the Historic Preservation Plan of 2006. Heritage tourism is not seen for its economic value but rather for its importance in increasing awareness and access to places and activities in order for both residents and visitors to understand local culture and history within historic preservation context.⁶⁴ The continued sentiment with historic preservation documents on heritage tourism as a tool for communities is seen again in the 2008-2012 Historic Preservation Plan where they note that cultural tourism is needed to “[link] neighborhoods and [promote] communication between diverse groups.”⁶⁵ Despite this, retail and entertainment growth through heritage tourism is seen more beneficial for community revitalization because of the economic benefits rather than social growth.

For instance, the Center City Action Agenda (2008) emphasized that downtown DC was an entertainment draw for all visitors, and its continued development as a commercial center was vital for the “stabilization of the District’s fiscal affairs, and in generating new tax revenues to help meet the social and economic needs of residents citywide.”⁶⁶ The agenda suggested that transportation around Chinatown and downtown DC is revamped in order to connect to major

⁶⁴ D.C. Office of Preservation, *Historic Preservation Plan 2000*, 12.

⁶⁵ DC Historic Preservation Office, *Historic Preservation Plan for the District of Columbia 2008-2012*. Washington D.C.: Office of Planning, 2008.
https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/Historic_Preservation_Plan_%202008_2012.pdf

⁶⁶ D.C. Office of Planning. *Center City Action Agenda*. Washington D.C.: Office of Planning, 2008.
https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/CCAA_the_opportunity.pdf

parts of the downtown area like the National Mall to areas near Chinatown in order to achieve the goal of creating a strong commercial center for all of downtown DC.⁶⁷ Likewise, the Historic Preservation Plan of 2008-2012 also assessed that historic preservation was a valuable tool for economic development and growth, because it helps to stimulate tourism and investment in the local economy.⁶⁸ There was a strong theme within urban planning documents that viewed economic development as the primary factor for community revitalization but these plans often failed to consider the idea that economic development has to be centered around social growth in order to be successful for current residents to thrive. This means to promote economic policies that provide a return on creating affordable rents for housing and businesses and sustaining resident-oriented amenities over tourist -based ones. Instead, many plans focused on solely on the value of tourism for community businesses instead of specifying how revenue from tourism can be used to provide for community growth.

Community Development

Part of the 2006 Comprehensive Plan update for the National Capitol included recommendations to develop specific policy plans to guide the development of certain neighborhoods – known as Small Area Plans (SAPs). The Chinatown Cultural Development Small Area Plan was then published in 2009 and focused on both community and economic development. This plan deviated from other previous urban planning documents in that it focused solely on Chinatown and explicitly laid out goals and actions that catered to the needs of the local community. The language of the plan also differed from previous urban planning

⁶⁷D.C. Office of Planning. *Center City Action Agenda: Corridors for Focused Investment*. Washington D.C.: Office of Planning, 2008.

https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/CAA_corridors_for_focused_investment.pdf

⁶⁸ DC Historic Preservation Office, *Historic Preservation Plan 2008-2012*, 2.

documents because previous plans had focused on how economic development is important for Chinatown to contribute to the downtown DC economy but instead the language within the Chinatown SAP focused on what tools could be used to help Chinatown become a sustainable community for both its residents and business owners.

It had appeared that the Chinatown SAP was a signal of change for urban documents relating to Chinatown but subsequent plans following this no longer focused on community development as a core component. The Chinatown Public Realm Plan was released in 2011 and was a follow up to the Chinatown SAP. The Chinatown SAP had focused on community development as the forefront of the plan, but the Chinatown Public Realm Plan instead focused on how commercial and tourist development was important to “reposition Chinatown as the region’s premier cultural destination for Asian and Chinese American events, performances, festivals, shopping and dining,”⁶⁹ Again, like previous urban planning documents commercialism is the primary focus for Chinatown’s growth. The trend of deviating away from community development was also evident in a 2016 report by the D.C. Office of Planning on the progress of the Chinatown SAP. Only 7 out of 46 actions had been completed, 4 were in progress, 33 had no action, and 2 had been cancelled.⁷⁰ The completed actions had related to Chinatown’s architectural design guidelines, completing a neighborhood profile to market Chinatown, and developing more urban plans for Chinatown. It would appear that Chinatown SAP may not be able to execute their goals for community development based on the lack of progress occurring.

⁶⁹ D.C. Office of Planning. *Chinatown Public Realm Plan*. Washington D.C.: Office of Planning, 2011. https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/Draft_Chinatown%20Public%20Realm_web%2011.10.11.pdf

⁷⁰ D.C. Office of Planning. *Status of Chinatown Cultural Small Area Action Plan: Fiscal Year 2016, 1st Quarter*. Washington D.C.: Office of Planning, 2016. https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/ChinatownCulturalSmallAreaActionPlan_1.pdf.

Concerns for community-oriented plans were reflected even in non-governmental documents like the technical panel program report commissioned by the Mayor's Office for Asian and Pacific Islander Affairs to redesign the Chinatown Park.⁷¹ The report had concluded that future plans for both the park and Chinatown needed to "redistribute public resources based on the community member's needs and protect strong cultural identity".⁷² Essentially, a third-party consultant group had also concluded that community development needs to the forefront of planning for Chinatown in order to better protect the community of Chinatown. But based on the 2016 Progress Report and the latest Chinatown Public Realm Plan, it appears unlikely that the DC government will shift its' focus back on sustaining and growing the Chinatown community.

Analysis

Throughout the research, it was clear that urban planning documents tended to focus on a broad view of an area and generalized policy guidelines did not consider individual neighborhood struggles. This presents a challenge for neighborhoods that are grouped into a single policy area that have different issues and the key objectives and goals for the policy area may not align with everyone's needs. Other issues include that fact that comprehensive plans specifically outline goals and actions for certain neighborhoods, but they do not provide deadlines as to when the actions should occur which may result in neighborhoods having to wait to be revitalized. The Chinatown SAP is an excellent example of this. The Comprehensive Plan of 2006 had outlined policies and key actions for Chinatown which included resulted in the Chinatown SAP being developed as a policy guideline to implement these policies. But in the past thirteen years, the Chinatown has yet to see any major changes to its social growth and only

⁷¹ Chinatown Park is the only existing green space in Chinatown and is managed by the National Park Services.

⁷² Yolanda Cole et al., "Technical Assistance Report: Realizing a New Vision for Chinatown Park" (Washington, DC: Urban Land Institute, 2017), pp. 1-44.

https://ulidigitalmarketing.blob.core.windows.net/ulidcnc/2017/08/Chinatown-TAP-Final_web.pdf

two out of forty-six actions within the plan were actually implemented. Part of the issue may stem from the fact that supplemental guidances like the Chinatown SAP hold no legislative power like the Comprehensive Plan which may lead to a lack of progress.

Historic preservation documents also differ vastly from urban planning documents in terms of goals because they only focus on preservation-related projects like NRHP registries instead of being involved in historic neighborhood community development. Despite acknowledging in nearly all of their historic preservation plans that gentrification, unaffordable housing and other social issues are a problem for the downtown DC historic areas, the plans do not provide any support for these communities beyond historic property designation. This is not the fault of the historic preservation plan but rather with the roles that historic preservation planners are allowed to have in the comprehensive planning process. Even within Chinatown, historic preservation plans focused solely on looking at NR nominations of historic properties or refining historic aesthetic guidelines in order to protect at least protect the physical cultural aspect of Chinatown from development.

Recommendations

The struggles of the Chinatown community have not been left unnoticed within recent government publications, but the issue is within the DC government coming up with solutions and goals that do not necessarily focus on community development as a forefront of area revitalization. Instead of coming up with plans that focus on social amenities and developing neighborhoods, most of these plans focused on economic revitalization and aesthetic marketing for the sake of creating a destination neighborhood rather than a home for Chinatown that is able to fulfill the needs of residents and generations afterwards. Although there are plans that focus and talk about community development methods, many of them lack legal power because they

can only serve as policy guidelines. Real change for Chinatown will not occur until legally binding documents are able to focus on social development instead of relying on commercial interests. In addition, preservation planners in D.C.'s Chinatown must also develop stronger partnerships with the community and other planning agencies in order to support local communities in completely.

1. Develop Stronger Community Engagement and Partnerships

The role of the preservation planner is not to determine how a historic site is important, but to aid communities in preserving their historic and cultural resources. This requires establishing a relationship with local communities in order to identify, research, and preserve cultural and historical resources. As stated before, traditional research methods of preservation planning like windshield and archival research fails to account the deliberate exclusion of APIA heritage in both the landscape and in academia. APIA communities themselves have already established their own archives and protected historic sites.⁷³ Partnerships with APIA heritage groups provide opportunities for preservation planners to work with APIA communities in preserving their heritage that would have not been otherwise found through traditional processes. It is important to note that genuine community engagement looks past historic resources and centers on overall community needs.⁷⁴

Community partnerships can also help to dispel rumors that surround historic preservation. The earlier designation of the 1980s Downtown Historic District had excluded parts of Chinatown because of concerns that historic districting would prevent development,

⁷³ Michelle Magalong, "Equity and Social Inclusion from the Ground Up: Historic Preservation in Asian American and Pacific Islander," in *Preservation and Inclusion*, ed. Erica Avrami, vol. 2 (New York, NY: Columbia University Press, 2020), <https://www.arch.columbia.edu/books/reader/503-preservation-and-social-inclusion>.

⁷⁴ Erica Avrami, "Pullman Revitalization Historic Preservation, and Community Engagement: An Interview with Ciere Boatright," in *Preservation and Inclusion*, vol. 2 (New York, NY: Columbia University Press, 2020).

restrict demolition, mixed-using development and be a detriment to Chinatown's revitalization.⁷⁵

Archival documents for this event did not include mentions of the Office of Historic Preservation's outreach to dispel these rumors but local preservation organizations like the Don't Tear It Down group had made efforts to discuss the benefits of historic districting with the Chinatown Consolidation Benevolent Association. While forty years has passed, community organizations like the 1882 Foundation, old Korean Legation Museum, and others have recognized the importance of historic preservation and it is vital that the D.C. Office of Preservation (OP) maintains these relationships.

2. Expand Historic Context Studies and Surveys

There is currently one APIA historic context study and survey being conducted on Korean and Chinese Americans in D.C. This project is expected to be completed by 2022. Although Korean and Chinese American heritage is important, there should be additional studies that look into the heritage of Filipino Americans, South Asians, and other APIA groups that have settled in the area. South Asians like Indian Americans have been increasing in population in the D.C. Area from an initial population of 950 in 1980, to 5,214 in 2010.⁷⁶ It is important that these studies and surveys are conducted before rapid urbanization affects existing historic properties that related to these APIA communities like the Manila House, literary landmark that was a cultural center for Filipinos in D.C. between the 1930s-1940s.

⁷⁵ Draft of Chinese Consolidated Benevolent Association statement opposing zoning changes for Chinatown which included historic district potentials. 1982. MS2011, Box 5, Folder 44, Harrison Lee Papers, George Washington University Special Collections Research Center, Washington D.C.

⁷⁶ U.S. Census Bureau; American Community Survey, 2010 American Community Survey 1-Year Estimates; generated by Karen Yee; using Explore Census Data; < <https://data.census.gov/cedsci/> >; (1 December 2021).

Campbell Gibson and Kay Jung, "Historical Census Statistics on Population Total by Race, 1790-1990, and by Hispanic Origin, 1970-1990, for the United States, Regions, Divisions, and States" Washington D.C., United States Census Bureau, Sept 2002. <https://www.census.gov/content/dam/Census/library/working-papers/2002/demo/POP-twps0056.pdf>

In addition to expanding historic context surveys and scopes to cover other APIA groups, the D.C. OP should also look toward utilizing them outside of the traditional preservation process by utilizing with other planning departments. This would help to change the language and decisions that have been made for Chinatown-centered plans that looked toward only commodifying Chinatown as an economic resource.

3. Historic Preservation Master Plans

There needs to be stronger language in the Historic Preservation Master Plan that looks toward fostering support for heritage and culture as a form of legitimate revitalization in order to convince community members, policy makers, and other government agencies of its' benefits. One such example is the 2020 Preservation Action Plan for the State of Colorado, the Master Plan. While this plan does not center around Chinatowns, the language of this plan makes direct efforts into fostering support for preservation initiatives. This includes making key actions to establishing research on the benefits of preservation, link the relationship between heritage, tourism and planning, work with local policy leaders or understanding this, and developing case studies for advocacy.⁷⁷ This would hopefully help D.C.'s OP in garnering support within planning departments and from policy makers to seek change through preservation efforts and see how preservation can expand beyond property nomination which in turn will help plans steer away from commercializing Chinatown.

While the Chinatown Cultural Small Area Action Plan was one of the first comprehensive plan that covered the actual wants and needs of the community, it missed historic preservation components. Boston's Chinatown Master Plan for 2020 is an example that D.C. OP

⁷⁷ History Colorado. *2020 Colorado Statewide Preservation Plan*. By Astrid Liverman. Denver, Colorado. Office of Archaeology and Historic Preservation, 2010.
<https://www.historycolorado.org/sites/default/files/media/document/2017/StatePlan.pdf>

can draw upon. This particular plan had included historic preservation goals which included working on utilizing financial and technical programs to acquire historic row houses for affordable housing, tenants' rights, and engage with community members to discuss guidelines for potential districting of the area and remove properties from private markets for affordability.⁷⁸ This type of plan incorporates both urban planning and historic preservation departments which was a component that was missing from the Chinatown Cultural Small Area Action Plan.

⁷⁸ Metropolitan Area Planning Council, *Boston Chinatown Master Plan 2020*, Boston, MA. Metropolitan Area Planning Council, 2020. https://www.mapc.org/wp-content/uploads/2020/06/2020MPDraft_ENGLISH_compressed.pdf

Chapter 6: Conclusion

Historic preservation has been traditionally isolated from the urban planning processes and relegated into a regulatory role. There are potentials for historic preservation to be integrated into the planning processes in order to build better plans that serve the community in a holistic matter. D.C.'s Chinatown was a case study example that demonstrated how the separation of these two departments resulted in plans that focused on commercialism, aesthetic, and limited community development for the interests of individuals that did not live in the Chinatown area. D.C.'s Chinatown had been a thriving community but development projects that were forged by the urban planning processes, and the failure of historic preservation to preserve beyond aesthetic contributed to the decline of the community. For historic preservation to remain relevant and important to today's changing society, it must learn to adapt beyond aesthetic and tangible culture by changing current criterion standards for designation, forge deeper community partnerships, and utilize its tools outside of the process of property nomination. Urban planning can better serve communities by relying on historic preservation for its' important resources like historic context studies and surveys in order to better understand the needs of the community and create connections between culture, development, and people.

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Appendix A. Tables

Table 2: Urban Planning and Preservation Document Table

Document Name	Year	Plan Type	Major Theme
Comprehensive Plan	1984	Urban	Aesthetic/Design
NRHP Historic Downtown District Nomination Form	1984	Preservation	Aesthetic/Design
Comprehensive Plan Amendment	1989	Urban	Commercial Interests
DC Historic Preservation Plan (1990-1992)	1989	Preservation	Aesthetic/Design -Somewhat unknown because the focus is on submission of the Downtown District Overlay
Chinatown Design Guidelines Study (Small Area Plan)	1989	Urban	Aesthetic/Design
Comprehensive Plan Amendment	1994	Urban	Aesthetic/Design
D.C. Historic Preservation Plan (1996)	1996		Aesthetic/Design
Comprehensive Plan Amendment	1998	Urban	Commercial Interests
DC Historic Preservation Plan	2000	Preservation	Commercial/Interests
Downtown Action Agenda	2000	Urban	N/A
Comprehensive Plan Federal Elements	2004	Urban	Commercial Interests
A Vision for Growing an Inclusive City (Policy Framework/Guideline)	2004	Urban	Community Development and Commercial Interests
The Comprehensive Plan for the National Capital, District Elements (Update to Comprehensive Plan)	2006/07	Urban	Commercial Interests and Aesthetic. Design
Center City Action Agenda	2008	Urban	Aesthetic and Commercial Interests
DC Historic Preservation Plan (2008-2012)	2008	Preservation	Community Development
Chinatown Cultural Development (Small Area Plan)	2009	Urban	
Moving from Vision to Reality, (Comprehensive	2010	Urban	Commercial Interests

Plan Progress Report #1 for Update of 2006)			
Chinatown Public Realm Plan	2011	Urban	Commercial Interests and Community Development
District of Columbia Historic Preservation Plan (2013-2016)	2013	Preservation	Commercial Interests and Community Development
Moving Forward Building an Inclusive City (Comprehensive Plan Progress Report #2 for the Update of 2006)	2013	Urban	Aesthetic/Design
Chinatown Green Street Demonstration Project	2015	Urban	Aesthetic/Design
Chinatown Cultural Small Action Plan Report, Quarter 1	2016	Urban	Aesthetic/Design
Realizing a New Vision for Chinatown Park	2017	Urban	Aesthetic/Design
District of Columbia Public Space Activation & Stewardship Guide	2018	Urban	Aesthetic/Design
Chinatown Design Guide Study (Released in 2017)	2019	Urban	Aesthetic/Design and Commercial
District of Columbia Historic Preservation Plan	2020	Preservation	Community Development and Aesthetic/Design