February 4, 2008

Mr. Royce Hansen, Chairman
Montgomery County Planning Board
M-NCPPC
8787 Georgia Avenue
Silver Spring, MD 20910

Dear Chairman Hansen and Members of the Board:

This submission provides the specific information requested by the Planning Board to further support an understanding of the historic significance of the Silver Spring Branch of the Perpetual Building Association. The attached information includes:

- A guide on nomenclature associated with mid-twentieth century architecture;
- Detailed information regarding Perpetual Building Association's assets, membership, and national and regional ranking over a one-hundred year period;
- Interior photographs to help understand the building's design;
- A summary of the historic and cultural significance of Perpetual Building Association's Silver Spring branch according to the Montgomery County Historic Preservation Ordinance Criteria; and
- A list of organizations and individuals in support of designation.

As you review this information, please place it into the context of the hearing. In all cases, it reinforces the statements made on behalf of Montgomery Preservation, Inc. (MPI). It also clearly refutes the statements made by Ms. Pat Harris, attorney for the building's owner, who spoke in opposition to the designation.

In response to the testimony in support of the designation, the owner's attorney Pat Harris provided NO accurate testimony that addressed the criteria. Her statements were fraught with errors—both of commission and omission, inaccurate reports of events, statements taken out of context, and a glaring lack of knowledge of both local history and modern architecture. She misrepresented statements made by members of the Historic Preservation Commission, misquoted statements from my report, and twisted facts to diminish their meaning. She guided the direction of the hearing to discuss irrelevant issues, and criticized commentary that she simply did not understand. Specifically, Ms. Harris' contention that the building lacks significance is unsupportable. In her efforts to discredit the building's merit, she went far beyond her role as attorney and ventured into that of expert witness—without the benefit of the necessary expertise. Her assertions were nothing more than opinion—uneducated opinion supported by meaningless and often ridiculous pronouncements. She is, by her own admission, unfamiliar with Perpetual Building Association and cannot appreciate its meaning for Montgomery County. She does not understand what role such an institution might have—she equates its significance with that of an anonymous corner ice-cream parlor—and cannot see the building's
progressive architectural design, its importance as one of the earliest Modernist buildings in Montgomery County, and its role as an icon for the most significant savings and loan association in the Washington Metropolitan region. The importance of the Bank Building and Equipment Corporation (BB&EC) as one of the most significant designers of financial institutional buildings eludes her—when, in fact, the firm’s design methodology and extraordinary repertoire of modern styles, as exhibited around the United States and South America, is of major interest to architectural historians. That four of its designs are presently listed on the National Register of Historic Places is support for the firm’s significance not against it.

Most salient here is that Ms. Harris avoids the fact that the National Register Coordinator of Maryland Historical Trust, Peter Kurtze, has determined the building to be eligible for listing in the National Register of Historic Places. The Montgomery County Historic Preservation Criteria are based on and consistent with the criteria used for the Maryland Inventory of Historic Places, and its precedent, the National Register criteria, as presented in the National Historic Preservation Act of 1966, as amended.

Perpetual introduced a modern banking aesthetic to Montgomery County. Perpetual exemplifies the dramatic changes occurring in Montgomery County during the middle of the twentieth century as Silver Spring grew to become a major suburban community and home to new building types, such as the branch bank. Ms. Harris may not have been familiar with Perpetual, but to thousands of Montgomery County residents, Perpetual was their building association and the institution that made it possible for them to own their own home. The property owner and their lawyer presented you with unsubstantiated, undocumented, conjectured opinions at the Planning Board Public Hearing. None of the statements they made are based on fact, evidence, or the designation criteria. We look forward to the Planning Board work session to clarify and correct the record and further explain the historic and cultural significance of the Silver Spring Branch of the Perpetual Building Association.

The story of Perpetual is significant—indeed, Perpetual’s history is the history of Montgomery County’s twentieth-century development—and the building merits listing in the Montgomery County Master Plan for Historic Preservation as a historic landmark.

Thank you.

Sincerely,

Emily Hotaling Eig

CC: Montgomery Preservation, Inc.
    Silver Spring Historical Society
    Maryland Historical Trust
    National Trust for Historic Preservation
A Discussion of Modern Architecture

While scholars and professionals have established a well-defined stylistic vocabulary for architecture through the first quarter of the twentieth century, an agreed-upon nomenclature for modern architecture in the United States has yet to be developed. Some prominent modern styles, such as the International Style, have been clearly identified and have a defined vocabulary, yet the majority of modern architecture cannot be so easily labeled. Scholars and other professionals recognize the difficulty in devising a common style language that comprehensively covers modern architecture. The challenge stems, in part, from the large number of buildings constructed after World War II, the introduction of new building types and materials, and myriad regional stylistic variations. Nonetheless, there is an acknowledgment that many of these buildings are significant—architecturally, historically, and culturally—and that we must work to better explain their significance and their acceptance by a larger population.

To better explain the discussion regarding defining and understanding modern architecture, many articles, reports and publications recently have been written. What follows are excerpts from two well-regarded publications: the National Trust’s *Preserving Resources from the Recent Past* (2007), and the General Services Administration’s *Growth, Efficiency and Modernism: GSA Buildings of the 1950s, 60s and 70s* (2003).

**Excerpts from *Preserving Resources from the Recent Past* (2007)**

This publication by the National Trust provides a sound introduction to understanding issues around the preservation of modern architecture as well as a discussion of defining a modern style.

“The decades following World War II witnessed an explosion of architectural and engineering innovation and social change...The resulting legacy is an astonishing array of cultural resources. There are iconic buildings of international architectural significance such as Mies van der Rohe’s Farnsworth House completed in 1951...sites associated with the Civil Rights Movement such as the Lorraine Motel in Tennessee...

...The recent past story is certainly about the architectural icons and nationally significant historic sites, but it also needs to be told through the less prominent places that are equally important to a local community and its sense of place...

...Preserving and appreciating what remains of the recent past will be extremely important for telling the story of America after World War II. Unfortunately, many of these places are now seen as dated or unfashionable—and rarely valued as “historic.” Far too often, these resources, whether simple or sublime, are perceived as expendable, unattractive, or unworthy of preservation...”
What Style (or Type) Is It?

"Architectural historians continue to debate how exactly to define Modernism, both stylistically and temporally, and don't always agree on specific style names. One reason why few agreed-upon style names exist for this architecture is because architects were trying to create architecture without historical precedent, to honestly reflect technological advances and new materials.

In the past, architectural historians often used architectural details to define the style of a building. But many architects working in a modern idiom had certain distaste for ornamental details. Thus many "modern" building not executed in an easily recognizable revival style lack distinguishing clues and a neatly definable style...

In addition, many people forget that our current nomenclature took time to evolve. Decades of survey, evaluation, and documentation helped establish an agreed-upon nomenclature to describe the resources of the more remote past. We are still in the process of trying to develop that nomenclature for our more recent history.

Consequently, modern architecture is a term given to a number of building styles with similar characteristics, such as simplified forms and lack of excessive or applied ornament. However, the term does not begin to describe the broad range of styles that emerged during the mid-20th century."

Excerpts from Growth, Efficiency and Modernism: GSA Buildings of the 1950s, 60s and 70s (2003)

This GSA publication provides a succinct explanation of how to define and characterize the modern era. Although the document focuses on buildings constructed by GSA, the discussion regarding the nomenclature for modern styles can be applied to all modern buildings to further our collective understanding of this important architectural period.

Defining the Modern Era (p. 12-13)

"The term 'Modern' has been used to describe various twentieth-century movements that combine functionalism with aesthetic ideals that reject historical precepts and styles....Modern architecture took many forms in numerous styles, some academically recognized and others less stylistically distinct.

Scholars and professionals studying twentieth-century buildings vary widely on their definitions of what the term "Modern architecture" entails and exactly what time period it encompasses. Generally, architects of the era and present-day architectural historians have avoided defining Modernism by any strict set of architectural characteristics because of the extensive range of materials and characteristics found in buildings of the recent past. Henry-Russell Hitchcock took a broad approach and echoed the thoughts of many scholars when he stated: "No better name than 'modern' has yet been found for what has come to be the characteristic architecture of the twentieth century."

Selecting a beginning date for the Modern period of architecture is somewhat arbitrary and few scholars agree on a definitive date. One date that reoccurs in the literature is 1923, the year that architect Philip Johnson and Hitchcock credit with being the beginning of the International Style in their book titled The International Style, which was published in 1932 to accompany an exhibition at the Museum of Modern Art. An ending date for the Modern period is equally difficult to discern. Many scholars mark the mid-1960s as the end of Modernism, due in large part to the 1966 publication of architect Robert Venturi’s Complexity and Contradiction in Architecture, wherein he heralds the beginning of Post-Modern architecture. However, as is typical with trends in architecture, widespread changes in architectural practice were slow to respond, taking as many as 15 to 20 years. Many buildings (often in smaller cities and towns) continued to be constructed in styles that were deemed outmoded by the architectural elite.

Several notable style dictionaries simply stop short chronologically of the more recent architectural styles. William J. R. Curtis in Modern Architecture Since 1900 proffers a chapter on “Crisis and Critiques in the 1960s” that describes the diverse approaches and varied personal styles of architects in the early 1960s, as well as their search for an architecture of greater robustness and complexity. He stops short of applying stylistic labels. Vincent Scully in Modern Architecture placed primary emphasis on the individual design characteristics and philosophies of architects of the time rather than on stylistic labels. The simple majority of sources appear to describe the individual design solutions and approach of notable 1960s-era Modern movement architects rather than using new stylistic terminology to group their designs into categories.

Some experts avoid these detailed stylistic labels altogether and simply refer to buildings “in the Modern style” or as part of the “Modern movement.” In an interview, architect Walter Gropius stated:

[i]he irresistible urge of critics to classify contemporary movements which are still in flux, putting each neatly in a coffin with a style label on it, has increased the widespread confusion in understanding the dynamic forces of the new movement in architecture and planning.

Scholars will continue to debate the use of the term “Modern” and its application to buildings of the recent past. In this report, the terms “Modern” and “Modern-era” are used in the general sense to refer to buildings in the study period of the 1950s, 60s, and 70s.”

*Modern Building Evaluation Guidelines (p. 104)*

“The evaluation of buildings of the recent past can be a difficult task. A skeptical general public often sees buildings of the Modern era as being expendable, or cold and offensive, or functionally obsolete. Others may overinflate the importance of individual buildings as judged against the large number of buildings of the Modern era. It is important to avoid the tendency to allow personal taste in architecture to

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outweigh legitimate criteria for determining the historic significance of these buildings.”

Conclusion (p. 110)

“There are no clear-cut answers, easy categorizations, or broadly applied methods for evaluating this set of buildings. Key decision-makers should be familiar with the history and potential significance of their buildings prior to undertaking projects that may affect character-defining features.”
<table>
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<tr>
<th>Year</th>
<th>Assets</th>
<th>National Rank</th>
<th>Regional Rank</th>
<th>Members</th>
<th>Interest Rate</th>
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<td>$1,768,572</td>
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<td>Perpetual Building Association, Washington Post 10 Mar 1899</td>
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<td>Josephine H. Ewalt, &quot;Perpetual--It Has Grown Great Graciously&quot; in Savings and Loan News, August 1952</td>
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<td>1927</td>
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<td>Josephine H. Ewalt, &quot;Perpetual--It Has Grown Great Graciously&quot; in Savings and Loan News, August 1952</td>
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<td>1932</td>
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<td>Josephine H. Ewalt, &quot;Perpetual--It Has Grown Great Graciously&quot; in Savings and Loan News, August 1952</td>
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<td>1941</td>
<td>$54,698,864</td>
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<td>U.S. Savings and Loan League, Savings and Loan Annual, Chicago, IL, 1942</td>
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<td>1944</td>
<td>$67,822,000</td>
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<td>American Savings and Loan News, quoted in &quot;8 Loan Ass'ns Here Among 100 Largest&quot; Washington Post, 15 June 1945</td>
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<td>1948</td>
<td>$100,076,781</td>
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<td>U.S. Savings and Loan League, quoted in &quot;Perpetual Hits New Asset Top of 100 Million&quot; Washington Post, 26 Aug 1948</td>
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## Perpetual Building Association Overview
### EHT Traceries, Inc.

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<th>Year</th>
<th>Assets</th>
<th>National Rank</th>
<th>Regional Rank</th>
<th>Members</th>
<th>Interest Rate</th>
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<td>$115,494,000</td>
<td>1</td>
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<td>$126,415,000</td>
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<td>1</td>
<td>69,657</td>
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<td>1</td>
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<td>73,606</td>
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<td>1953</td>
<td>$168,665,000</td>
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<td>1</td>
<td>81,014</td>
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<td>$194,056,000</td>
<td>2</td>
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<td>3</td>
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<td>1</td>
<td>103,440</td>
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<td>$240,366,000</td>
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<td>1</td>
<td>113,293</td>
<td>3.5%</td>
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<td>$258,901,000</td>
<td>4</td>
<td>1</td>
<td>1</td>
<td>117,735</td>
<td>4%</td>
<td>The American Banker, 18 Feb 1960</td>
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<td>1958</td>
<td>$303,809,000</td>
<td>5</td>
<td>1</td>
<td>1</td>
<td>125,000</td>
<td>4%</td>
<td>The American Banker, 6 Feb 1961</td>
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<td>1959</td>
<td>$342,298,000</td>
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<td>1</td>
<td>1</td>
<td>136,487</td>
<td>4%</td>
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<td>1960</td>
<td>$374,858,000</td>
<td>6</td>
<td>1</td>
<td>1</td>
<td>141,746</td>
<td>4%</td>
<td>The American Banker, 15 Feb 1963</td>
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<td>1961</td>
<td>$414,328,000</td>
<td>7</td>
<td>1</td>
<td>1</td>
<td>144,268</td>
<td>4%</td>
<td>The American Banker, 15 Feb 1963</td>
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<td>1962</td>
<td>$469,169,000</td>
<td>8</td>
<td>1</td>
<td>1</td>
<td>146,663</td>
<td>4%</td>
<td>The American Banker, 11 Feb 1965</td>
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<td>1963</td>
<td>$427,834,000</td>
<td>10</td>
<td>1</td>
<td>1</td>
<td>180,000</td>
<td>4-4.5%</td>
<td>Moody's Investor Services, Moody's Bank and Finance Manual, 1986</td>
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<td>1964</td>
<td>$453,686,000</td>
<td>11</td>
<td>1</td>
<td>1</td>
<td>180,000</td>
<td>4-4.5%</td>
<td>&quot;Every six minutes a resident of this area chooses Perpetual for his new savings account&quot; Edward C. Baltz, &quot;Perpetual Building Association: 'One Friend Tells Another...&quot; Newcomen Society in North America, 1966.</td>
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<tr>
<td>1965</td>
<td>$555,414,000</td>
<td>11</td>
<td>1</td>
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<td>180,000</td>
<td>4-4.5%</td>
<td>Moody's Investor Services, Moody's Bank and Finance Manual, 1986</td>
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<td>1966</td>
<td>$471,122,000</td>
<td>13</td>
<td>1</td>
<td>1</td>
<td>196,763</td>
<td>90% of resources are invested in first mortgages in Washington area  Shareholder Report, quoted in &quot;Perpetual Records Record High Assets&quot; Washington Post 12 Jan 1971</td>
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<tr>
<td>1967</td>
<td>$574,002,036</td>
<td>5</td>
<td>1</td>
<td>1</td>
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<td>90% of resources are invested in first mortgages in Washington area  Shareholder Report, quoted in &quot;Perpetual Records Record High Assets&quot; Washington Post 12 Jan 1971</td>
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<tr>
<td>1970</td>
<td>$734,267,521</td>
<td>5</td>
<td>1</td>
<td>1</td>
<td>196,763</td>
<td>90% of resources are invested in first mortgages in Washington area  Shareholder Report, quoted in &quot;Perpetual Records Record High Assets&quot; Washington Post 12 Jan 1971</td>
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<tr>
<td>1972</td>
<td>$900,000,000</td>
<td>65</td>
<td>1</td>
<td>1</td>
<td>196,763</td>
<td>90% of resources are invested in first mortgages in Washington area  Shareholder Report, quoted in &quot;Perpetual Records Record High Assets&quot; Washington Post 12 Jan 1971</td>
<td></td>
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<tr>
<td>1978</td>
<td>$1,064,956,000</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>196,763</td>
<td>&quot;one in five families in the greater Washington area doing business with Perpetual&quot; James Gerry Moore, &quot;Perpetual Bank is to Outstrip the DC-Area Competition&quot; in The American Banker, 15 Apr 1987</td>
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<tr>
<td>1981</td>
<td>$1,500,000,000</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>196,763</td>
<td>&quot;one in five families in the greater Washington area doing business with Perpetual&quot; James Gerry Moore, &quot;Perpetual Bank is to Outstrip the DC-Area Competition&quot; in The American Banker, 15 Apr 1987</td>
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<td>1987</td>
<td>$4,000,000,000</td>
<td>45</td>
<td>1</td>
<td>1</td>
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<td>&quot;one in five families in the greater Washington area doing business with Perpetual&quot; James Gerry Moore, &quot;Perpetual Bank is to Outstrip the DC-Area Competition&quot; in The American Banker, 15 Apr 1987</td>
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<td>1988</td>
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<td>39</td>
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<td>1</td>
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<td>&quot;one in five families in the greater Washington area doing business with Perpetual&quot; James Gerry Moore, &quot;Perpetual Bank is to Outstrip the DC-Area Competition&quot; in The American Banker, 15 Apr 1987</td>
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</table>
We are providing these interior photographs in response to the Planning Board’s request made to the property owner. While designation to the Master Plan for Historic Preservation clearly does not cover the interior, nor are the nominators proposing any interior restrictions, it is useful to see the interior to better understand the holistic design of the building. For example, the open floor plan of the main banking hall exemplifies the changes in modern bank design in the mid-twentieth century. The interior photographs illustrate modern design elements, details and materials. All photographs are courtesy of the Silver Spring Historical Society and were taken in 2007-08.
PERPETUAL BUILDING ASSOCIATION MEETS THE CRITERIA OF THE MONTGOMERY COUNTY HISTORIC PRESERVATION ORDINANCE

THE BUILDING IS AN IMPORTANT AND FAMOUS LANDMARK, STANDING AS AN ICON FOR THE PERPETUAL BUILDING ASSOCIATION (CRITERIA 1A, 1D AND 2E): As a branch office of Perpetual Building Association, long the largest building association in the Washington Metropolitan region, this building has stood since 1958 as a financial institution for the community. In the 1950s and 1960s, Perpetual was one of only three savings and loans in Silver Spring and it was, by far, the largest in assets and in prominence with a major building on Georgia Avenue. The Silver Spring Branch remains intact as one of the two mid-century Perpetual branches in Montgomery County, designed as part of a progressive architectural program to symbolize the Perpetual Building Association. Unlike the Bethesda branch, it remains free-standing. Perpetual’s progressive design program was an outstanding example of corporate branding—employing a familiar and distinct visual appearance to communicate the organization and its values.

PERPETUAL BUILDING ASSOCIATION WAS THE LARGEST SAVINGS AND LOAN IN THE WASHINGTON METROPOLITAN REGION AND FOR 17 YEARS WAS THE LARGEST IN THE UNITED STATES (CRITERIA 1A AND 1D): Perpetual was simply the largest savings and loan association in the country for 17 years and continued as the area’s largest for most of the twentieth century. Please see the attached chart documenting the assets, membership and national and regional ranking of Perpetual Building Association.

THE SILVER SPRING BRANCH OFFICE REPRESENTS PERPETUAL BUILDING ASSOCIATION IN ITS HEYDAY AND THE 1950S BUILDING BOOM OF SILVER SPRING (CRITERIA 1A AND 1D): When the Silver Spring Office opened in 1958, Perpetual was the largest savings and loan in the East. Its assets were over $300 million dollars and its membership was over 113,000, a number that far exceeded any other savings and loan in the Washington Metropolitan region. Its assets continued to grow and it retained its leadership in the Washington area, even when its holdings were surpassed by savings and loan associations in other regions in the country.

THE SILVER SPRING BRANCH IS AN EXCELLENT EXAMPLE OF MODERN ARCHITECTURE IN MONTGOMERY COUNTY AND REPRESENTS THE CREATION OF A SPECIALIZED BUILDING TYPE (CRITERIA 2A AND 2C). While experts might debate the name to ascribe to this building’s architectural style, they all agree upon the architectural significance of the building’s modern aesthetic. Furthermore, the building represents an important architectural collaboration and the creation of a specialized building type that combined architectural, technological, and structural disciplines.
IN ADDITION,

THE HPC RECOMMENDED DESIGNATION: The HPC voted to support the recommendation for listing on the Master Plan. The HPC’s consideration over the course of two sessions was not unusual nor is it significant to the Planning Board’s consideration. The property owner offered testimony from an expert witness, Bill Lebovich, whose testimony was unable to convince the HPC of the position against designation.

THE COMMUNITY RECOGNIZES THE BUILDING’S SIGNIFICANCE WITH WIDESPREAD SUPPORT FOR THE DESIGNATION: Numerous community associations and individuals, preservation organizations including the National Trust for Historic Preservation, as well as elected officials, support the designation. Please see the attached list of supporters.
Perpetual Building Association, Silver Spring Branch
Supporters of Historic Designation

Maryland Historical Trust, Opines Perpetual Building is National Register-Eligible

National Trust for Historic Preservation

Historic Preservation Commission, Montgomery County

Preservation Maryland

Maryland State Senator Jamie Raskin, District 20

Maryland State House Delegate Tom Hucker, District 20

Maryland State House Delegate Heather Mizeur, District 20

Montgomery Preservation Inc.

Silver Spring Historical Society

Recent Past Preservation Network

Modern Movement in Maryland

Art Deco Society of Washington

Historic Takoma Inc.

Peerless Rockville

MNCPPC Historic Resources Survey, December 2002, David Berg, Consultant

Kim Prothro Williams, Architectural Historian, D.C. Historic Preservation Office,
National Register Coordinator, former HPC Commissioner,

David Maloney, D.C. Preservation Office, State Historic Preservation Officer

Robert R. Scholz, Washington, D.C., nephew of Robert O. Scholz

Josie Scholz, wife of Robert R. Scholz

Bonnie Rosenthal, Historic Preservation Consultant

Sally Lichtenstein Berk, D.C. Preservation League former President

Wenceslaus A. Sarmiento, Bank Building & Equipment Corporation, Director of Contemporary Architecture, 1955-1965
Perpetual Building Association, Silver Spring Branch
Supporters of Historic Designation


Dr. Mina Marefat, AIA, Design Research, Washington, D.C.

Woodside Park Citizens Association

Seven Oaks-Evanswood Citizens Association

East Silver Spring Citizens Association Executive Committee