

City of Chicago

Department of Fleet and Facility Management



FLEET & FACILITY MANAGEMENT

Section 106 Summary of Decision

**Pullman Artspace Lofts
11127-29 S. Langley Avenue
11137-49 S. Langley Avenue
704-706 E. 112th Street**

May 2018

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Table of Contents

1 Introduction	1
2 Project Description	2
Project Overview	2
Government Reviews Background	5
Federal Historic Rehabilitation Tax Credits	5
Section 106 Review and Consultation	6
3 APE Development	7
4 Eligibility Assessment	12
Methodology	12
Eligibility Analysis	13
Architectural Resources	13
Archaeological Resources	19
5 Effects Findings	21
Architectural Effects Assessments	21
11127-11129 South Langley Avenue and 704-706 112 th Street (“Block Houses A and C”)	22
11137-11149 South Langley Avenue	22
Other Contributing Resources to the Pullman Historic District	25
Pullman Historic District/National Monument	25
Archaeological Effects	26

Appendices

Appendix A: Development Plan Supporting Information

Appendix B: APE Field Investigation Photographs

Appendix C: Photographs of Contributing Resources within the APE

Appendix D: Phase 1 Archaeological Reconnaissance Survey

Appendix E: Unanticipated Discovery Plan

Figures

Figure 1: Site Plan Overview	3
Figure 2: Existing Conditions and Rendering of Proposed Development	4
Figure 3: Area of Potential Effects	9

Tables

Table 1: NRHP Contributing Resources within the APE	14
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1 Introduction

This report details the known historic and cultural resources within the Area of Potential Effects (APE) for the proposed Pullman Artspace Lofts, documents the review of eligibility determinations made by Secretary of the Interior qualified architectural historians and archaeologists, describes the consultation process undertaken in accordance with Section 106 of the National Historic Preservation Act of 1966 (NHPA) for the project, and provides the City of Chicago Department of Fleet and Facility Management's (2FM) final finding on effects to historic and cultural resources and rationale in making this decision.

The findings contained within this report are based on historic architectural analysis and coordination with MacRostie Historic Advisors LLC (MHA), archaeological analysis conducted by Midwest Archaeological Research Services, Inc. (MARS, Inc.; now known as RRL Consulting, Inc.), and 2FM's review of the following resources (the Reports):

- National Register of Historic Places Inventory Nomination Form – Pullman Historic District; 1970.
- Chicago Landmark Designation Report – “A Summary of Information on the South Pullman District”; June 1972.
- Chicago Historic Resources Survey; 1995.
- Illinois Historic and Architectural Resources Geographic Information System; 2003.
- National Park Service – “Pullman Historic District” Reconnaissance Survey”; July 2013.
- Federal Register, Vol. 80, No. 37; February 25, 2015.
- “Phase I Archaeological Reconnaissance Survey of the Pullman Artspace Lofts Parcel”, Midwest Archaeological Research Services, Inc.; May 16, 2016.
- Pullman Artspace Lofts – Federal Historic Preservation Certification Application Part 1, Part 2, and Amendments; 2016-2017.
- The Beman Committee of the Pullman Civic Organization – “Homeowner Guide, Pullman Historic District”; November 2017.
- The Secretary of the Interior's “Standards for Rehabilitation”
- The Secretary of the Interior's “Standards for the Treatment of Historic Properties”; 2017.
- “Section 106 Guidance, Advice, and Assistance for Users”, Advisory Council on Historic Preservation.
- Pullman Artspace Lofts Memorandum, MacRostie Historic Advisors, LLC; January 30, 2018.
- Previous correspondence from the Illinois State Historic Preservation Office.

Both MHA and MARS, Inc. are qualified professionals that meet the Federal standards set forth in the Secretary of the Interior's *Professional Qualifications Standards* (48 FR 44738-9).

In addition to these sources, 2FM's finding has considered consulting party input received through the Section 106 consultation process, and agency consultation and correspondence that led to the proposed design presented during the March 9, 2018 Section 106 consultation meeting.

2 Project Description

PROJECT OVERVIEW

The proposed project is Pullman Artspace Lofts, a mixed-use affordable live/work space for artists and their families being developed by a partnership that includes Artspace Projects, Inc., Chicago Neighborhood Initiatives, Inc., and PullmanArts (the developers). The proposed project site is located in Chicago, Illinois on the east side of Langley Avenue between 111th Street and 112th Street in Chicago's Pullman neighborhood. The proposed project site is located at the eastern-most edge of the Pullman Historic District, which was listed in the National Register of Historic Places (NRHP) on October 8, 1969. The project site is also within a larger area designated a National Historic Landmark on December 20, 1970, a City of Chicago Landmark District on October 16, 1972, and a National Monument on October 16, 2015.

The project involves the construction of a new building on an 18,500-square-foot vacant lot and the rehabilitation of two long-vacant, National Register-listed buildings on either side of the lot. The \$18 million development will include 38 affordable, live/work apartments and 2,000 square feet of community space intended for use as a gallery, meeting place, and community room for special community arts classes.

The Chicago Housing Authority (CHA) proposes to provide supplemental financing for the development through the use of a 30-year, federally funded project rental housing assistance program contract for six of the 38 proposed units. Because this project would use federal funding, it is subject to meeting federal environmental review requirements, including Section 106 of the NHPA.

Figure 1 provides a site plan of the proposed project, and **Figure 2** provides a rendering of the proposed development. **Appendix A** contains additional details on this site plan, including existing conditions information, elevations, and proposed detailed information on design and materials.

Figure 2: Existing Conditions and Rendering of Proposed Development



GOVERNMENT REVIEWS BACKGROUND

Two separate, but complementary, government reviews have been undertaken for this project. A brief summary of government reviews on this project to date is provided below.

Additional clarification on these processes have also been provided in the Section 106 Summary of Comments and Responses document prepared in April 2018 and included as part of 2FM's distribution of this finding to consulting parties.

2FM has closely coordinated with the Illinois State Historic Preservation Office (SHPO) and the Advisory Council on Historic Preservation (ACHP) to minimize duplication of efforts and clarify any coordination needed between these efforts throughout the Section 106 consultation process.

Federal Historic Rehabilitation Tax Credits

Pullman Artspace Lofts intends to utilize Federal Historic Rehabilitation Tax Credits for funding of this project. The Federal Historic Preservation Tax Incentives program encourages private sector investment in the rehabilitation and re-use of historic buildings. These tax incentives are available for buildings that are National Historic Landmarks, are listed in the National Register, and that contribute to National Register Historic Districts and certain state or local historic districts. Properties must be income-producing and must be rehabilitated according to standards set by the Secretary of the Interior. The National Park Service (NPS) and the Internal Revenue Service (IRS) administer this program in partnership with the SHPO in each state.

The Historic Preservation Certification application for this project has involved a two-part application process given that the buildings proposed to be rehabilitated as part of this project are listed in the NRHP as contributing buildings in the Pullman Historic District. Parts 1 and 2 of the federal Historic Preservation Certification Application were reviewed and approved by the SHPO and the NPS in 2016. Additionally, the project received Chicago City Council zoning approval and was approved by the Commission on Chicago Landmarks Permit Review Committee as meeting the Commission's "Guidelines for Alterations to Historic Buildings and New Construction."

While the project had assumed local and state financing would fund the entirety of the project, as project funding plans were further developed, it was determined that the Chicago Housing Authority (CHA) would provide supplemental financing of the project through a 30-year, federally funded project rental housing assistance program contract for six units. Because the project currently proposes to utilize federal funding, additional coordination and consultation under Section 106 of the NHPA was required and undertaken.

Section 106 Review and Consultation

Section 106 requires federal agencies to consider effects on historic resources from their actions and to balance preservation needs with the need for the actions. As provided in 36 CFR § 800, the Section 106 process "seeks to accommodate historic preservation concerns with the needs of federal undertakings through consultation" (36 CFR § 800.1(a)). The goal of the consultation is to identify historic properties potentially affected by the undertaking, assess project effects, and seek ways to avoid, minimize, or mitigate any adverse effects on historic properties, should they exist.

2FM is responsible for federal environmental review, decision-making, and action as the Responsible Entity for this project under 24 CFR § 58.4. These responsibilities include assumption of responsibilities for carrying out and completing required Section 106 consultation.

INITIATION OF SECTION 106 PROCESS

2FM determined that the proposed undertaking could affect historic properties and worked with SHPO and the developers' architectural historians to develop an APE for the project which would consider the potential for both direct and indirect effects due to the project. Additional details on the APE are provided in **Section 3** of this report.

On November 9, 2017, 2FM sent letters to SHPO and 39 potentially interested consulting parties, notifying them of the project and upcoming Section 106 process, providing a project fact sheet and APE map, and soliciting early input on the project and interest in becoming a consulting party for the project. 2FM identified this list of potentially interested members of the public based on regulatory guidance, conversations with the United States Department of Housing and Urban Development (HUD) and SHPO, previous experience, and in coordination with the developers.

Based on responses received and further coordination with the SHPO and ACHP, 2FM confirmed the list of consulting parties for the project Section 106 process. 2FM sent follow up letters to consulting parties on February 6, 2018 notifying them of their role as a consulting party and providing a Public Involvement Plan which identified the history of public outreach on the project as well as coordination with the Section 106 consultation process. Consulting parties for this project have included SHPO, ACHP, HUD, Chicago Department of Planning and Development Historic Preservation Division, NPS, Miami Tribe of Oklahoma, National Trust for Historic Preservation, CHA, Illinois Housing Development Authority, Alderman Anthony Beale, Historic Pullman Foundation, Pullman National Monument Preservation Society, Preservation Chicago, Landmarks Illinois, Artspace Projects, Inc., Chicago Neighborhood Initiatives, Inc., PullmanArts, and several individual Pullman neighbors.

SECTION 106 CONSULTATION MEETINGS

A Preliminary Eligibility and Effects technical memorandum was prepared and distributed to consulting parties on March 8, 2018 and a consultation meeting to discuss the APE and preliminary eligibility and effects findings was held on March 9, 2018. This meeting was noticed to consulting parties and the public, open to public participation, and attended by 78 people. Following distribution of the technical memorandum, a 30-day comment period was established for review of the preliminary findings and to provide an opportunity to provide comments on the preliminary findings.

A meeting summary was prepared following the meeting and distributed to consulting parties to aid in their review and response during the comment period.

A total of 60 comments were received during the comment period. 2FM reviewed all comments received during the consultation meeting and as part of the comment period and prepared a summary of comments and responses to comments received following the end of the comment period. Input received as part of this consultation has informed 2FM's final determinations on the Section 106 eligibility and effects of the project. The summary of comments and response document as well as this final summary of findings document have been distributed to all consulting parties to meet all documentation requirements of 36 CFR 800.11 and to provide an open, transparent process of 2FM's final finding and rationale.

In accordance with Section 106 of the NHPA and its implementing regulations, 36 CFR Part 800, 2FM is providing information on this finding of No Adverse Effect for SHPO review and concurrence regarding the above-referenced project. As per implementing regulations in 36 CFR 800.5(c), 2FM is also notifying all consulting parties of this finding, providing documentation in accordance with 36 CFR 800.11 and has initiated a 30-day review and comment period. A Section 106 consulting parties meeting is scheduled for Tuesday, May 15, 2018 at 9:00 AM at the Pullman National Monument Visitor Information Center, 11141 S. Cottage Grove Ave., Chicago, Illinois 60628 to review and explain 2FM's findings.

2FM has also submitted this finding and information to the ACHP in accordance with procedures of 36 CFR 800.5(c)(3) to review this finding and provide 2FM with its opinion on whether the adverse effect criteria have been correctly applied. 2FM has prepared this summary of decision documentation containing the rationale for the decision for ACHP's consideration.

3 APE Development

The Cultural Historic Area of Potential Effects, or APE, is designated pursuant to 36 CFR § 800.16 (d), which defines the APE as "the geographic area or areas within which an undertaking

may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.”

The scale and nature of the undertaking was considered in establishing the APE. The project involves the rehabilitation of two NRHP-listed buildings according to the Secretary of the Interior’s Standards for Rehabilitation. It also includes the construction of one new building, which is designed to be compatible in its height, massing, design, materials, and details with the architectural character of the overall historic district. The proposed new construction also corresponds to the scale and form of the three-story tenement block, now demolished, that occupied the site from circa 1881 to circa 1930.

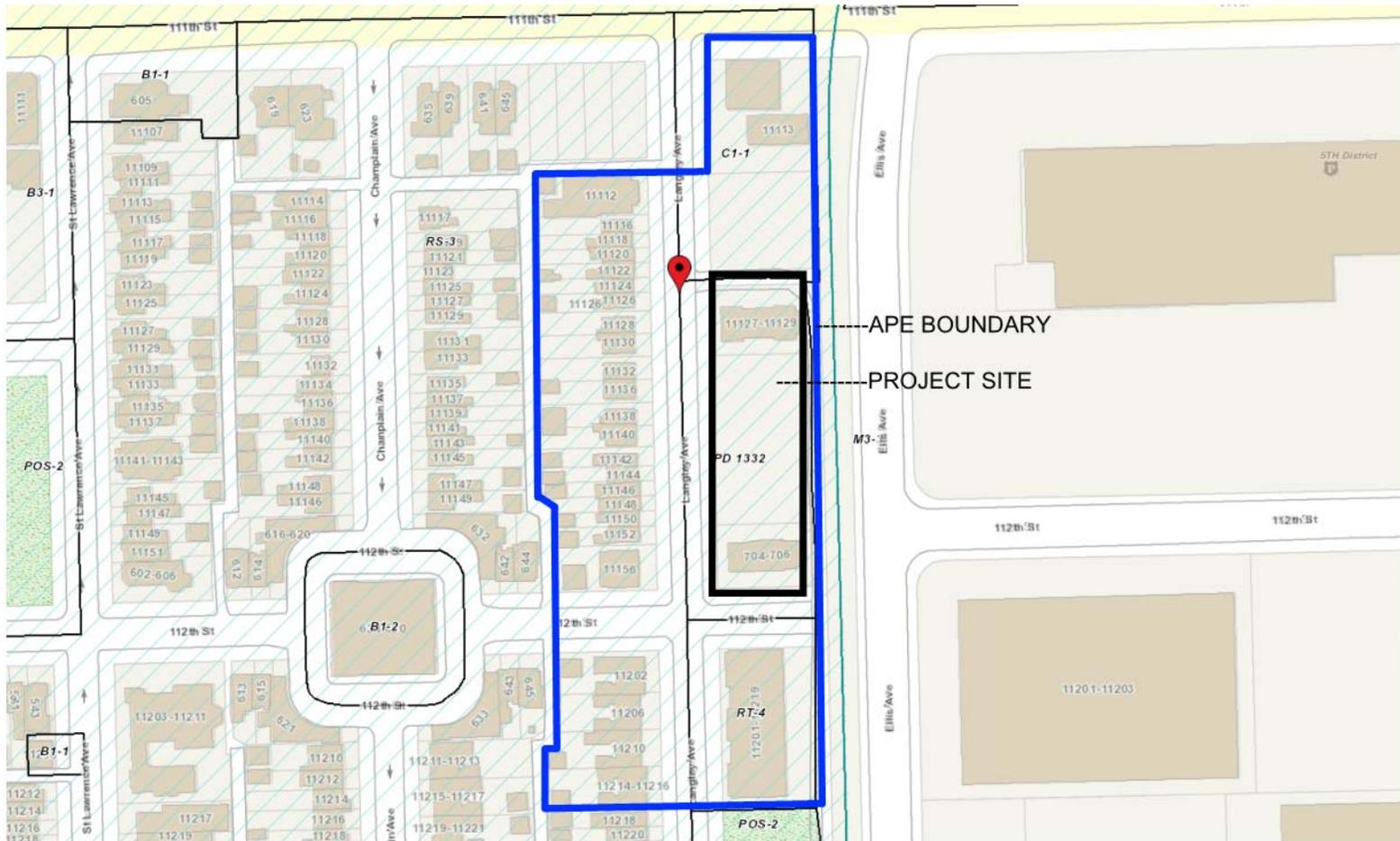
In establishing the APE, the agency official is also directed to: review existing information on historic properties within the APE, including any data concerning possible historic properties not yet identified; seek information from consulting parties, and other individuals and organizations; and gather information from any Indian tribe or Native Hawaiian organization identified pursuant to 36 CFR 800.3(f).

In accordance with these considerations and in consultation with the SHPO, the APE for cultural/historic resources was developed. In development of the APE, previous archaeological analysis was reviewed (see **Section 4** for further details) to determine appropriate boundaries where there could be a potential for encountering undiscovered historic artifacts. 2FM reviewed field-verification of the APE boundaries undertaken by MHA to confirm the potential extent of long-term factors, including physical and visual impacts; and temporary factors, including but not limited to auditory and vibratory impacts. The field verification of the proposed APE boundaries also included representative photographs of view sheds of the project site from inside and outside the APE (see **Appendix B**).

The architectural field verification also considered an alternate APE by driving and walking the proposed APE boundaries. However, MHA determined that the boundaries are precise as proposed. The project site is located at the eastern edge of the Pullman Historic District, where it is bounded to the east by a hard border and to the west by residential buildings which comprise a consistent street wall and visual barrier to views of the site from the west.

Figure 3 provides a map identifying the boundaries of the APE for this project.

FIGURE 3: AREA OF POTENTIAL EFFECTS



Development of the APE has included consideration of both potential for direct or indirect effects due to the implementation of this proposed project. The APE includes the entire area of the proposed project site and a larger surrounding area from which the proposed new construction could be visible, partially visible, or have the potential for noise or vibrational impacts during construction. The APE includes 26 residential buildings which can be considered as contributing to the character of the Pullman Historic District and two non-contributing buildings. The APE also includes all areas to be used for project staging and temporary construction. The proposed APE is bounded as follows:

- The north boundary of the APE is defined on the west side of Langley Avenue as an east/west alley abutting the north side of the historic residence at 11112 Langley Avenue, to the north of which is a vacant lot and 111th Street. On the east side of Langley Avenue, the north boundary of the APE is 111th Street and includes vacant land and a non-historic gas station across an alley and north of the project site.

The southwest corner of Langley Avenue and 111th Street was not included in the APE due to the presence of a large community garden/green space area, which features no above-ground structures that would be affected.

- The south boundary of the APE extends west across Langley Avenue to consider view sheds of the project site from historic residences at 11214-11216, 11210, 11206, and 11202 Langley Avenue, all of which are south of 112th Street. The southern APE boundary is limited to the northern end of Langley Park, a greenspace that covers much of the east side of Langley Avenue to 113th Street. The structures on the west side of the 11200 block of south Langley Avenue, a portion of which are outside the APE, have oblique and partially-obstructed views of the project site.
- The east boundary of the APE is the east boundary of the National Register Historic District, to the east of which is a railroad track, Ellis Avenue, and a combination of vacant land and non-historic construction; the east boundary of the APE was extended south across 112th Street to consider view sheds of the project site from 11201-11219 Langley Avenue (a non-contributing building bordered to the south by a vacant parcel).

The existing rail right-of-way, including fencing and vegetation, provides both a physical and visual boundary to the Pullman Historic District and to the project site from the east. This boundary is penetrated only at 111th and 114th streets.

- The west boundary of the APE includes all of the historic residences on the west side of Langley Avenue from 11112 to 11214-11216 Langley Avenue.

The west APE boundary is set at the north-south alley between Langley and Champlain Avenues. The rows of existing structures along the west side of Langley Avenue provide a visual barrier that limits views to the project site from blocks to the west.

The APE boundary established above was used to further identify NRHP-eligible resources. While 2FM received some comments from consulting parties requesting expansion of the APE to include the entirety of the National Landmark Monument and Historic District, 2FM believes the APE has been developed to consider all eligible resources and potential effects of the project. While the APE is not expanded to the entirety of the National Landmark Monument or Historic District Boundary, because the APE is located within these boundaries and contains contributing resources to the district, an assessment of effects on the entirety of the historic district and National Landmark Monument area was conducted as part of the Preliminary Eligibility and Effects technical memorandum and has been considered in making this final finding.

4 Eligibility Assessment

METHODOLOGY

The NRHP is administered by the NPS, which has developed national evaluation criteria to guide the selection of properties determined eligible for listing in the NRHP. The quality of significance in American history, architecture, archaeology, engineering, or culture may be present in districts, sites, buildings, structures, or objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association with one or more of the following four criteria, defined in 36 CFR § 60.4:

- A. Events that have made a significant contribution to the broad patterns of American history on a local, state, and/or national level
- B. Lives of persons significant in the history of the city, state, and/or the United States
- C. Distinctive characteristics of a type, period, or method of construction, or the work of a master, or high artistic values, or a significant and distinguishable entity whose components may lack individual distinction
- D. Information important in prehistory or history

Section 800.4(b)(1) of the regulations implementing Section 106 of the National Historic Preservation Act (“Protection of Historic Properties,” 36 CFR Part 800) require federal agencies to make a “reasonable and good faith effort” to identify historic properties within the APE that may be affected by their undertakings.

The regulations set out several factors the agency must consider in determining what is a “reasonable and good faith effort” to identify historic properties. They call for the agency official to consider:

- Past planning, research and studies;
- The magnitude and nature of the undertaking and the degree of federal involvement;
- The nature and extent of potential effects on historic properties; and
- The likely nature and location of historic properties within the APE.

The regulations note that a reasonable and good faith effort may consist of or include “background research, consultation, oral history interviews, sample field investigation, and field survey.”

2FM’s reasonable and good faith effort to identify historic properties within the APE have been assisted by its review of the Reports which represent extensive past planning efforts, research, and studies which have definitively identified historic properties in the APE. It is also guided by additional NPS reviews during this Section 106 process further examining the potential for

archaeological resources eligible for inclusion on the NRHP at former Block House B, the site of new proposed construction.

ELIGIBILITY ANALYSIS

Architectural Resources

The project site is located at the eastern edge of the Pullman Historic District, which was listed in the NRHP on October 8, 1969. The National Register nomination cites significant Criteria A and C contributions to Architecture, Community Planning and Development, Industry, Landscape Architecture, and Social History for the period 1880 through 1907. The National Register district comprises 250 acres with 1,650 contributing buildings. The project site is also within a larger area designated a National Historic Landmark on December 20, 1970, a City of Chicago Landmark District on October 16, 1972, and a National Monument on October 16, 2015.

Based on the eligibility analysis conducted, one NRHP-listed historic district (Pullman Historic District) as well as a total of 26 contributing resources to the district within the APE were identified as NRHP eligible or listed resources. The majority of structures within the APE are identified as contributing buildings both in the national Pullman Historic District and the local South Pullman District. 2FM reviewed the independent field survey verification by MHA which confirmed the presence of 26 contributing resources within the APE.

Only two buildings within the APE are considered non-contributing to the character of the historic district. They are a two-story modern apartment complex at 11201-11219 Langley Avenue and a contemporary Citgo gas station at 11113 Langley Avenue. These structures post-date the period of significance (1880-1907) for the Pullman Historic District. In addition to these structures, the current vacant lot where former Block House B was built and demolished in 1938 is a non-contributing resource to the district.

No new architectural resources were identified as eligible for listing in the NRHP within the APE.

The 26 contributing buildings to the historic district within the APE, summarized in **Table 1**, retain good architectural integrity and reflect the overall character of the Pullman Historic District. Pictures of each of these 26 contributing resources are provided in **Appendix C**.

Pullman was designed as a planned community with several standard building types placed within a street grid consisting of named streets, featuring the majority of structures, running north to south and numbered streets running east to west.

TABLE 1: NRHP CONTRIBUTING RESOURCES WITHIN THE APE

<u>ID</u>	<u>ADDRESS</u>	<u>PROPERTY DESCRIPTION</u>	<u>ELIGIBILITY RATIONALE</u>
1	704 - 706 112th Street	Subject Property - 3-story Block House	Included in Pullman Historic District and local South Pullman District. High level of integrity.
2	11112 Langley Avenue	2 1/2-story building originally served as a boarding house. The first and second stories are of brick, the top story is treated as a mansard. Date of construction: ca. 1882	Included in Pullman Historic District and local South Pullman District. High level of integrity.
3	11116 Langley Avenue	Two-story, attached row house with brick first floor and mansard roof with dormers. Date of construction: ca. 1882	Included in Pullman Historic District and local South Pullman District. High level of integrity. Minor fenestration alteration.
4	11118 Langley Avenue	Two-story, attached row house with brick first floor and mansard roof with dormers. Date of construction: ca. 1882	Included in Pullman Historic District and local South Pullman District. High level of integrity. Minor fenestration alteration.
5	11120 Langley Avenue	Two-story, attached row house with brick first floor and mansard roof with dormers. Date of construction: ca. 1882	Included in Pullman Historic District and local South Pullman District. High level of integrity.
6	11122 Langley Avenue	Two-story, attached row house with brick first floor and mansard roof with dormers. Date of construction: ca. 1882	Included in Pullman Historic District and local South Pullman District. High level of integrity.
7	11124 Langley Avenue	Two-story, attached row house with brick first floor and mansard roof with dormers. Date of construction: ca. 1882	Included in Pullman Historic District and local South Pullman District. High level of integrity. Minor alteration includes painted masonry.
8	11126 Langley Avenue	Two-story, attached row house with brick first floor and mansard roof with dormers. Date of construction: ca. 1882	Included in Pullman Historic District and local South Pullman District. High level of integrity. Minor alteration includes painted masonry.
9	11127 - 11129 Langley Avenue	Subject Property - 3-story Block House	Included in Pullman Historic District and local South Pullman District. High level of integrity. Minor alteration to roof line.

**Pullman Artspace Lofts
Section 106 Summary of Decision**

<u>ID</u>	<u>ADDRESS</u>	<u>PROPERTY DESCRIPTION</u>	<u>ELIGIBILITY RATIONALE</u>
10	11128 Langley Avenue	Two-story, semi-attached, apartment flat. Date of construction: ca. 1881	Included in Pullman Historic District and local South Pullman District. High level of integrity. Reversible alteration includes parging of primary elevation.
11	11130 Langley Avenue	Two-story, semi-attached, apartment flat. Date of construction: ca. 1881	Included in Pullman Historic District and local South Pullman District. High level of integrity. Reversible alteration includes parging of primary elevation.
12	11132 Langley Avenue	Two-story, semi-attached, apartment flat. Date of construction: ca. 1881	Included in Pullman Historic District and local South Pullman District. High level of integrity.
13	11136 Langley Avenue	Two-story, semi-attached, apartment flat. Date of construction: ca. 1881	Included in Pullman Historic District and local South Pullman District. High level of integrity.
14	11138 Langley Avenue	Two-story, semi-attached, apartment flat. Date of construction: ca. 1881	Included in Pullman Historic District and local South Pullman District. High level of integrity.
15	11140 Langley Avenue	Two-story, semi-attached, apartment flat. Date of construction: ca. 1881	Included in Pullman Historic District and local South Pullman District. High level of integrity.
16	11142 Langley Avenue	Two-story, attached row house with brick first floor and mansard roof with dormers. Date of construction: ca. 1882	Included in Pullman Historic District and local South Pullman District. High level of integrity. Minor fenestration alteration.
17	11144 Langley Avenue	Two-story, attached row house with brick first floor and mansard roof with dormers. Date of construction: ca. 1882	Included in Pullman Historic District and local South Pullman District. High level of integrity.
18	11146 Langley Avenue	Two-story, attached row house with brick first floor and mansard roof with dormers. Date of construction: ca. 1882	Included in Pullman Historic District and local South Pullman District. High level of integrity. Minor alteration includes painted masonry.
19	11148 Langley Avenue	Two-story, attached row house with brick first floor and mansard roof with dormers. Date of construction: ca. 1882	Included in Pullman Historic District and local South Pullman District. High level of integrity. Minor alterations include painted masonry and changes to fenestration.

Pullman Artspace Lofts
Section 106 Summary of Decision

<u>ID</u>	<u>ADDRESS</u>	<u>PROPERTY DESCRIPTION</u>	<u>ELIGIBILITY RATIONALE</u>
20	11150 Langley Avenue	Two-story, attached row house with brick first floor and mansard roof with dormers. Date of construction: ca. 1882	Included in Pullman Historic District and local South Pullman District. High level of integrity. Minor alteration includes painted masonry.
21	11152 Langley Avenue	Two-story, attached row house with brick first floor and mansard roof with dormers. Date of construction: ca. 1882	Included in Pullman Historic District and local South Pullman District. High level of integrity.
22	11156 Langley Avenue	Two-story, semi-attached, apartment flat. Date of construction: ca. 1881	Included in Pullman Historic District and local South Pullman District. High level of integrity.
<u>23</u>	11202 Langley Avenue	Two-story, attached, 4-unti apartment flat. Date of construction: ca. 1882.	Included in Pullman Historic District and local South Pullman District. High level of integrity. Minor alterations include application of PermaStone and changes to fenestration.
<u>24</u>	11206 Langley Avenue	Two-story, attached, 4-unti apartment flat. Date of construction: ca. 1882.	Included in Pullman Historic District and local South Pullman District. High level of integrity. Minor alteration to entryway.
<u>25</u>	11210 Langley Avenue	Two-story, attached, 4-unti apartment flat. Date of construction: ca. 1882.	Included in Pullman Historic District and local South Pullman District. High level of integrity. Minor alteration to entryway.
<u>26</u>	11214 - 11216 Langley Avenue	Two-story, attached, 4-unti apartment flat. Date of construction: ca. 1882.	Included in Pullman Historic District and local South Pullman District. High level of integrity.

The area south of 111th Street is situated along four primary tree-lined streets between Cottage Grove Avenue on the west and the rail right-of-way and Ellis Avenue on the east. A majority of the blocks are characterized by attached and semi-attached buildings, forming a contiguous and uniform street wall, as designed by architect Solon S. Beman.

Most structures in the APE are of between two and two and one-half stories, with three-story structures situated along 111th Street and along the east side of Langley Avenue. Most structures were set back from the sidewalk to allow for a front garden.

The area's characteristic residential buildings include many common themes in form, design, and materials. Beman designed approximately fourteen different building types, which are repeated in groups throughout the area. All buildings are regularly fenestrated and have a primary elevation clad in red pressed brick with contrasting dark brick banding. Individual building types featured a range of architectural detail including, but not limited to: flat roofs with corbeled brick cornices; mansard roofs with dormers; wood gables; pressed metal pediments; and semi-arched or hooded windows and doorways. Over time, one typical alteration has involved the replacement of wood front porches with concrete porches.

Buildings within the APE on Langley Avenue reflect five residential types designed by Beman and built between 1881 and 1882. These buildings are within the Pullman Historic District's period of significance of 1880 through 1907, retain good architectural integrity, and can be considered contributing to the historic district. These eligible resources within the APE are discussed in the context of these five residential types.

11127-11129 SOUTH LANGLEY AVENUE AND 704-706 112TH STREET ("BLOCK HOUSES")

These buildings are part of the proposed project site. Historically, the main Pullman workshops stood across the rail line to the east. Beman's design located the block houses, which were the densest and cheapest housing, along this eastern edge. While the majority of the community's row houses and cottages were of two-stories, the three-story block houses were tall enough to form a visual barrier at the edge of the town, blocking views of the Pullman Company's manufacturing facilities to the east. A total of six block houses, lettered "A" through "J," were originally built along Langley Avenue between 111th and 113th streets. Only buildings "A" (11127-11129 South Langley Avenue) and "C" (704-706 112th Street) remain as examples and are contributing resources to the district. Notably, former Block House "B" was located at the proposed new building site for this project.

The block houses within the project site continue to convey their location, design, setting, materials, workmanship, feeling, and association as contributing to the historic district.

11112 SOUTH LANGLEY AVENUE

The structures on the west side of Langley Avenue were designed as mid-range worker housing with one or two units per floor. Most structures are of two-stories, except for the two and one-half story former boarding house at 11112 South Langley. All other structures are either semi-attached apartment flats, each with four units, or four-to-five room row houses.

The structure at 11112 South Langley was built in 1882 as a boarding house. The two and one-half story building features a mansard roof and a non-historic enclosed porch on the main (east) elevation. A recent renovation cleaned the exterior masonry and restored windows. The building is the only one of its kind within the APE and remains in excellent condition and is a contributing structure to the Pullman Historic District.

11116-11126 AND 11142-11152 SOUTH LANGLEY AVENUE

The structures at 11116 to 11126 and 11142 to 11152 were built in 1882. These are sets of six row houses with brick first floors and mansard roofs with dormers on the second floor. All of these structures remain in very good condition with only a few minor alterations such as painted masonry, in-filled or altered fenestration, or replaced front porches. However, these conditions do not diminish the individual significance of each structure. These row houses continue to be contributing resources in the Pullman Historic District.

11128-11140 AND 11154-11156 SOUTH LANGLEY AVENUE

The structures at 11128 to 11140 and at 11154 to 11156 South Langley were built in 1881. They are two-story semi-attached, four-unit apartment flats. These structures have all masonry walls with regular fenestration, brick hoods above entry doors, corbeled brick cornices, and contrasting bands of dark brick. The structures are generally in excellent condition and retain their significant character defining features. All retain their fenestration, including basement windows. The structure at 11128 to 11130 was parged with light stucco scored to look like brick, but it continues to convey the feeling and form of the district. Other alterations include non-historic concrete front porches. Despite these alterations, all semi-attached apartment flat buildings are significant and continue to contribute to the Pullman Historic District.

11202-11216 SOUTH LANGLEY AVENUE

The structures at 11202 to 11216 South Langley were built in 1882. These structures are two stories and have a common central entrance for all four apartment units. Character defining features include metal cornices and pediments, mansard roofs, central entrances, and the pressed brick and contrasting dark brick banding that is typical of Beman's Pullman buildings.

They retain a high degree of integrity and most character defining features are preserved. Alterations generally include altered entrances at 11206 and 11210, and the application of Permastone to the east elevation of 11202. Despite these alterations, the structures continue to convey their significance in the Pullman Historic District.

Archaeological Resources

At the direction of the SHPO, a Phase I Archaeological Reconnaissance Survey of the project site was undertaken in 2016 to assess pre-historic or historic archaeological resources within the APE. MARS, Inc. (now known as RRL Consulting, Inc.), a firm meeting the Federal standards set forth in the Secretary of the Interior's *Professional Qualifications Standards* (48 FR 44738-9), was enlisted to conduct this work. **Appendix D** provides the Phase 1 Survey.

Prior to conducting the reconnaissance survey, MARS, Inc. consulted the Inventory of Illinois Archaeological Sites database, maintained by the Illinois State Museum, for information on the location of archaeological sites that have been found previously within or near the project area. Preliminary examination of the site files indicates that there are no archaeological sites recorded within one mile of the study site.

MARS, Inc.'s methodology included research to identify previous archaeological surveys in the vicinity. Their research revealed a project conducted in advance of construction of a METRA railyard (ASSR no. 4170) in 1990 and a monopole cellular telecommunications tower (ASSR no. 18465) in 2010, excavation of shafts within the Calumet Tunnel System related to a storm water overflow reservoir (ASSR no. 7641) in 1996, and expansion of the University of Chicago Press at 11030 S. Langley (ASSR no. 11173) in 2000.

In addition to the surveys listed in the state database, MARS, Inc. also identified five archaeological surveys performed by DePaul University: 1) one at the Florence Hotel (Baxter and Hartley 2011); 2) one at a former Carriage House (Baxter 2011a); 3) one at the Arcade Site (Baxter 2011b); and 4) one each at two private residences (Baxter 2100c). During these investigations, field school students learned about the lives of people visiting or living in Pullman.

In summary, MARS, Inc. noted and mapped the footprint of Block House B within Lot 4 of the original plat of Pullman. The Phase I excavations recovered a substantial quantity of Historic Period artifacts relating to a dumping episode and the demolition of Block House B (11-Ck-1226). The artifacts post-date the Pullman Historic District's Period of Significance (1880-1907) and do not correspond to the habitation of Block House B. The bulk of these artifacts relate to a post-Prohibition (1935-1964) dump of alcohol bottles, whiskey and California wine. Residential goods [found] included a furniture caster, three marbles, table ceramics, porcelain

bathroom fixture fragments and wastewater pipes, a clay pipe fragment, and coal/slag. The extent of the dump is not known, but appears to be limited to the northwest corner of the area investigated. While MARS, Inc. reached intact clayey loam under the fill, the archaeologists did not discover any prehistoric artifacts or features associated with a Native American occupation. Based on the MARS, Inc. analysis, no further consideration appeared warranted and they recommended project clearance.

In a letter dated June 10, 2016, the professional staff of the SHPO concurred with these findings and determined that “the site is not a National Register-eligible property under Criterion D for archaeology, which is the ability to yield significant information about the past. All that remains from the period of significance is a partially destroyed foundation and rubble field. Because the building and its method of construction are well documented, archaeology would not yield any information that is not already known.”

Subsequent to the Section 106 consulting parties meeting held on March 9, 2018, archaeological staff at the National Park Service (NPS) Midwest Archaeological Center and representatives from the Pullman National Monument Preservation Society convened a call on March 22, 2018. The outcome of that call was an agreement that prior to NPS submitting their comments, NPS archaeologists would once again carefully review the MARS, Inc. report to determine whether additional site mapping was warranted to complete the archaeological record for this site. As part of NPS comments received during this comment period, NPS notes that “While the NPS feels that, although a more thorough site mapping would have been ideal, the record of the site presented in the 2016 (archaeological) report, including its sketch map and photographs, was adequate to support a determination of no adverse effect to the Pullman Historic District. The archaeological remains at the site do not hold the potential to produce the level of significant data necessary to qualify the site as eligible for the National Register under Criterion D.”

5 Effects Findings

The assessment of adverse effects for this project has been conducted according to the criteria of adverse effect (36 CFR § 800.5). Per regulations from the Advisory Council on Historic Preservation, there are three levels of effects findings: No Effect, No Adverse Effect, and Adverse Effect.

- **No Effect:** A No Effect determination is found when there are no historic properties present or there are historic properties present but the undertaking will have no impact on them.
- **No Adverse Effect:** A No Adverse Effect determination is found when the undertaking's effects do not meet the criteria of the preceding sentences on adverse effects or the undertaking is modified or conditions are imposed to avoid adverse effects.
- **Adverse Effect:** An Adverse Effect is an "alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register of Historic Places" such that a resource's location, design, setting, materials, workmanship, feeling, or association is diminished. This can include both direct effects (caused by the action and occurring at the same time and place) and indirect effects (reasonably foreseeable effects caused by the project but occurring later in time or further removed).

Examples of adverse effects include physical destruction or damage; alteration not consistent with the Secretary of the Interior's *Standards*; relocation of a property; change of use or physical features of a property's setting; visual, atmospheric, or audible intrusions; neglect resulting in deterioration; or transfer, lease, or sale of a property out of Federal ownership or control without adequate protections. If a property is restored, rehabilitated, repaired, maintained, stabilized, remediated or otherwise changed in accordance with the Secretary of the Interior's *Standards*, then it will not be considered an adverse effect (assuming that the SHPO agrees).

ARCHITECTURAL EFFECTS ASSESSMENTS

All previously NRHP-listed resources described in **Section 4** were further assessed for effects based on the project description provided in **Section 2** of this report. The effects assessments for these resources are described through the rest of this section and have considered consulting party input received during the Section 106 consultation and comment period.

11127-11129 South Langley Avenue and 704-706 112th Street (“Block Houses A and C”)

The proposed scope of work to the historic block houses includes the following: The exteriors of Block Houses A and C will be restored to their original appearance. Facades will be cleaned of non-historic paint and original masonry repaired and repointed. Historic Pullman paint colors, selected by architect Solon S. Beman in 1881 and used community-wide, will be used for all painted exterior features. Non-historic windows and doors will be removed and replaced with new windows and doors to match the missing originals. Block House A’s heavily altered third floor will be restored, and its missing mansard roofs replicated. Non-historic porches and steps will be removed and new historically-accurate porches and steps constructed. Non-historic fire escapes and stair additions will be removed and new compatible metal stair systems added to the exteriors of each building. Inside Block Houses A and C, their most prominent historic features – their four center staircases – will be retained in place and repaired as necessary. Apartment spaces will be reconfigured to accommodate the new residential program. Twelve of the thirty-eight new apartment units will be housed in Block Houses A and C. These treatments meet the Secretary of the Interior’s Standards for Rehabilitation as approved by NPS and SHPO during Federal Historic Rehabilitation Tax Credits program reviews. 2FM agrees that the rehabilitation of these resources meet the Secretary of the Interior’s Standards and will result in no adverse effects to these resources.

11137-11149 South Langley Avenue

The remaining units will be housed within a new three-story masonry building constructed on the 18,500 square foot vacant lot between the two existing historic block houses, the site once occupied by Block House B. This new construction will not be physically connected to the historic structures and will be compatible in scale, massing, materials, details, and setback to Block Houses A and C.

The applicant worked closely with the SHPO, the Commission on Chicago Landmarks, and local Pullman community groups to achieve a design for the new construction that is compatible with Pullman’s surrounding historic context. Refinements made to the design of the new construction based on SHPO, Landmarks, and community input include:

- The height of the new construction was lowered by 34 inches to 39’-0” total in order to align more closely with the heights of Block Houses A and B and to reduce its apparent visual mass.
- The west wall of the new construction was shifted eastward by two feet, moving the new construction back from the facades of Block Houses A and B, closer to the original location of the now-demolished Block House B.

- The new construction's primary west façade was "flattened" to improve its visual compatibility with the surrounding residential context.
- The proposed porches at the new construction will have a painted or paint-like finish, similar to the finishes of surrounding historic porches.

In addition to the new construction, a surface parking area with angled parking will be created along the east edge of the site along the alley just west of the existing railroad tracks to address previous community concerns about parking provision for the development. The entire site will be landscaped with new trees, plantings, lawns, and sidewalks.

In its professional opinion, MHA found that the proposed new construction to be compatible in height, massing, design materials, and details with the architectural character of the historic district and reminiscent of the multistory tenement block that occupied the site from circa 1881 to circa 1930 when it was demolished. The proposed design is consistent with the Secretary of the Interior's *Standards for Rehabilitation* – Standard 9 in particular – that new construction needs to be built in a manner that protects the integrity of the historic building(s) and the property's setting. The federal standard requires that the siting, size, shape, scale, proportion, materials, and the relationship of new construction be consistent with the prevalent character of the immediate neighbors and the district.

Further, the new construction is located on the site of the previously demolished Block House B, a three-story residential building of similar scale and massing. The proposed new construction will reestablish Beman's original design intent for the east side of Langley Avenue in this block and will maintain the strong street wall which is a character-defining feature of the historic district.

Any indirect construction impacts, such as increased noise and visual intrusions, would be temporary and would not permanently alter the integrity of these historic properties.

Some consulting parties expressed in their comments a desire for the proposed project to meet the Secretary of the Interior's Standards of Reconstruction rather than Rehabilitation given its location within a designated National Monument and National Historic Landmark District. These comments pointed to the previous design of the project site area as a complex rather than as individual resources (including Block House B, which was demolished in the 1930s) or noted the history of the project site area (referred to as "Poverty Row") and referencing the important contribution of the Pullman Porters. Others provided comments in support of the use of the Secretary of the Interior's Standards of Rehabilitation as the appropriate treatment.

Several historic preservation agencies, including SHPO, NPS, and the Commission on Chicago Landmarks have taken the position that the Secretary of the Interior's Standards for Rehabilitation, not Restoration, are the appropriate treatment for the proposed project. These views, as well as consulting party input, have informed 2FM's application of the criteria for determining whether there are adverse effects from the proposed project.

While the Section 106 process seeks to identify cultural resources, assess effects, and determine ways to avoid, minimize, or mitigate adverse effects should they occur, meeting the Secretary of the Interior's Standards raises the bar in applying the criteria of adverse effects. In fact, the criteria for applying adverse effects outlined in 36 CFR 800.5 specifically identifies the ability of a project to meet the Secretary of the Interior's Standards in determining whether there are adverse effects. Given the designation of Pullman as both an NRHP listed historic district and now as a National Monument, 2FM agrees that meeting the Secretary of the Interior's Standards is appropriate for the proposed project under 36 CFR 800.10.

With regard to the appropriate treatment, 2FM agrees with the previous findings of NPS, SHPO, and the Commission on Chicago Landmarks that rehabilitation is an appropriate treatment for developing this project. In addition to agency reviews, several considerations, as outlined in NPS guidance on the subject, have informed 2FM's determination of the appropriateness of the Rehabilitation treatment:

- *Level of Significance:* 2FM recognizes the importance of this resource as both a National Monument and National Historic Landmark District in considering the appropriate treatment. Reconstruction would have limited application given the previous demolition of Block House B and an inability to recreate the property in a way that conveys its appearance at an earlier time in history. Rehabilitation standards, on the other hand, acknowledge the need to alter or add to a historic property to meet new uses, like those proposed for this art space, while continuing to convey the historical, cultural, and architectural value within the district.
- *Physical Condition:* Block House B, which is a non-contributing resource to the district, was demolished in the 1930s. Block Houses A and C, which continue to contribute to the historic district, will require more extensive repair and replacement as well as alterations for the new uses proposed. The Rehabilitation Standard allows for the proposed improvements in a way that still respects the historic and architectural significance of the property and surrounding district.
- *Proposed Use:* Many historic buildings can be adapted for a new use or updated for a continuing use without seriously impacting their historic character. However, it may be very difficult or impossible to convert some special-use properties for new uses without major

alterations, resulting in loss of historic character and even integrity. The proposed primary use, housing, is consistent with historical use at the property.

The proposed design has undergone many reviews and revisions to meet the Secretary of the Interior's Standards and receive approvals for advancement, and the Standards for Rehabilitation have allowed for development of a sensitive design approach that will help preserve the historic character of the site, is sensitive to re-use of historic materials to maintain the character and integrity of the contributing resources, and to be compatible with the National Monument and National Historic Landmark District.

Based on the proposed improvements and the applicability of the Secretary of the Interior's Standards for Rehabilitation, the proposed new construction will result in no adverse effects to these resources.

Other Contributing Resources to the Pullman Historic District

There would be no direct effects to any of the other NRHP contributing resources as part of this project. These contributing resources are located within the viewshed of the proposed development, however these changes in the visual environment would not affect the characteristics that qualify these resources for inclusion in the NRHP. The two contributing resources that are subject to improvement as part of the project would be consistent with the Secretary of the Interior's Standards, and the vacant parcel to be built as part of the project would be similar in height, massing, design materials, and details with the architectural character of the historic district.

Any indirect construction impacts, such as increased noise and visual intrusions, would be temporary and would not permanently alter the integrity of these historic properties.

Pullman Historic District/National Monument

Direct effects to the district would include restoring the exteriors of Block Houses A and C to their original appearance to meet the Secretary of the Interior's Standards and construction of a new three-story masonry building on the 18,500 square foot vacant lot between the two existing historic block houses, the site once occupied by Block House B. This new construction will not be physically connected to the historic structures and will be compatible in scale, massing, materials, details, and setback to Block Houses A and C. No other direct effects are proposed based on the intended development.

Given that the proposed new construction will be compatible in height, massing, design materials, and details with the architectural character of the historic district as well as reminiscent of the multistory tenement block that occupied the site from circa 1881 to circa

1930 when it was demolished, and because rehabilitation of Block Houses A and C will meet the Secretary of the Interior's Standards, there would be no direct adverse effects to the historic district or National Monument.

Indirect effects would include some changes to the visual environment due to the new proposed building and rehabilitation of two contributing resources to the district to meet the Secretary of the Interior's Standards, but these would not affect the reasons the district is listed in the NRHP. Any indirect construction impacts, such as increased noise and visual intrusions, would be temporary and would not permanently alter the integrity of the historic district or National Monument.

ARCHAEOLOGICAL EFFECTS

As noted in **Section 4**, a Phase I Archaeological Reconnaissance Survey of the project site was undertaken in 2016 by an archaeological consultant meeting federal professional qualifications. The archaeologists followed standard methodology, including background research, visual reconnaissance, and excavation. The Phase I excavations recovered a substantial quantity of Historic Period artifacts relating to a dumping episode and the demolition of Block House B which post-date the Pullman Historic District's Period of Significance (1880-1907); the artifacts recovered do not correspond to the habitation of Block House B. In addition, the archaeologists did not discover any prehistoric artifacts or features associated with a Native American occupation. The archaeologists concluded that no further consideration of excavation work or data recovery appeared warranted. The professional staff of the SHPO Concurred with these findings on June 10, 2016.

Based on this work, no historic archaeological resources were identified within the proposed construction limits of this project.

2FM received some comments from consulting parties during the comment period that questioned the validity of the MARS, Inc. Phase I Archaeological Reconnaissance Survey or that requested a new archaeological investigation be conducted to assess the eligibility of former Block House B for inclusion on the NRHP and to distinguish this Section 106 review from previous reviews and analysis conducted.

Subsequent to the Section 106 consulting parties meeting held on March 9, 2018, archaeological staff at the NPS Midwest Archaeological Center and representatives from the Pullman National Monument Preservation Society convened a call on March 22, 2018. The outcome of that call was an agreement that prior to NPS submitting their comments, NPS archaeologists would once again carefully review the MARS, Inc. report to determine whether

additional site mapping was warranted to complete the archaeological record for this site. As part of NPS comments received during this comment period, NPS notes that “While the NPS feels that, although a more thorough site mapping would have been ideal, the record of the site presented in the 2016 (archaeological) report, including its sketch map and photographs, was adequate to support a determination of no adverse effect to the Pullman Historic District. The archaeological remains at the site do not hold the potential to produce the level of significant data necessary to qualify the site as eligible for the National Register under Criterion D.”

2FM has reviewed and considered the MARS, Inc. report, previous SHPO and NPS concurrences, and the views of all consulting parties in identifying the potential for historic or archaeological resources and in making its determination of effect under Section 106. Based on this review, 2FM concurs with SHPO and NPS determinations on the adequacy of the analysis conducted and that the site does not meet Criteria A, B, C, or D for nomination on the NRHP for archaeology. Given the role and expertise of the NPS in administering the NRHP, 2FM believes that the examination of the potential eligibility of this property for listing on the NRHP represents an effort greater than that of a reasonable and good faith effort to identify historic resources within the Section 106 process.

While SHPO’s concurrence was made as part of earlier federal rehabilitation tax credit coordination efforts, the analysis conducted conforms to professional standards and methodologies used in determining the potential for encountering historic archaeological resources. In accordance with 36 CFR 800.2(a)(3), 2FM may use analyses and recommendations of applicants and consultants in fulfilling its responsibilities under Section 106 and making effects findings and is responsible for ensuring that these materials meets applicable standards and guidelines. Given the extensive agency reviews to date, 2FM believes these materials do meet all applicable standards and guidelines for use in making its finding. Because no archaeological resources were determined to meet the criteria for inclusion on the NRHP, and based on concurrences received from SHPO and NPS that there would be no adverse effects to archaeological resources, 2FM agrees that the studies conducted are appropriate for making a finding of effects, and that the proposed project would meet all relevant Secretary of the Interior’s Standards as previously agreed upon by SHPO and NPS as part of the federal tax rehabilitation credit process, including Standard 8.

While the Phase 1 Archaeological Reconnaissance Survey conducted for this project did not indicate the presence of historic/archaeological cultural resources meeting any of the NRHP criteria, 2FM understands that archaeological and historical sites occasionally are discovered during construction projects, regardless of whether the project area has been subjected to a complete and thorough pre-construction cultural resources survey.

Given the opinions expressed during the Section 106 consultation process, 2FM's responsibilities under Section 110 (54 USC 306107) of the NHPA to undertake such planning and actions as may be necessary to minimize harm to National Historic Landmarks, and a consideration of the provisions under 36 CFR 800.13 regarding post review discoveries, in making its finding of No Adverse Effect, 2FM has developed an early Unanticipated Discovery Plan to provide a plan and process for resolving any unanticipated adverse effects that could occur as part of implementation of this project. This is included as **Appendix E**. In the event that an unanticipated discovery situation occurs during project implementation, and the resource is deemed to be potentially significant and therefore potentially eligible for inclusion to the NRHP by 2FM in consultation with SHPO, then a plan of action will be formulated in consultation with the SHPO, 2FM, and the developers. This plan could include avoidance strategies, resource evaluation, or resource mitigation and will be submitted to the SHPO and consulting parties for review and comment. All consulting parties involved in the Section 106 consultation process are expected to respond and react as efficiently as possible. Further construction work in the area of the unexpected discovery will cease until the actions of the formulated plan are completed.

Appendix A:
Development Plan Supporting Information

Attachment B:
APE Field Investigation Photographs

Attachment C:
Photographs of Contributing Resources within the APE

Attachment D:
Phase 1 Archaeological Reconnaissance Survey

Appendix E:
Unanticipated Discovery Plan