

April 5, 2018

RE: Pullman Artspace Lofts – Response to 2FM’s APE and “No Adverse Effects” Determination

SUMMARY

The Department of Fleet and Facility Management (2FM) is the “Agency Official” for the Section 106 review of the Pullman Artspace Lofts (“Undertaking”). 2FM announced that the Undertaking will have “no adverse effects” on the Pullman National Historic Landmark District (“District”) on March 9, 2018. With this determination, 2FM concurs with the National Park Service (“NPS”), Illinois Historic Preservation Division (“IHPA”) including the SHPO, and the developer’s paid historic consultant MacRostie Historic Advisors (“MHA”) who all claim the project “is consistent with the Secretary of the Interior’s *Standards for Rehabilitation*.”¹

This letter is to notify 2FM that we formally object to its stated Area of Potential Effects (“APE”) and its determination of “no adverse effect.” We request that 2FM expand the APE to include the entirety of the District and request that 2FM acknowledge the “adverse effects” described in this letter and consult to resolve them in accordance with applicable federal law.²

First, 2FM is aware but has not acknowledged publicly the SHPO’s considerable confusion about the procedural requirements of a lawful Section 106 review. 2FM omits this information from its supplied documentation and uncritically accepts the SHPO’s findings. It appears to us that 2FM has failed to fulfill its responsibilities as defined by 54 U.S.C. § 306107.

Second, 2FM should be aware that Stantec’s stated design approach is flawed in a variety of significant ways: It draws its inspiration from the design and materials of the buildings across the street, which is historically inappropriate and demonstrates a lack of familiarity with the original design of the model town. The east facing elevation of the new construction will not contain any brick. This is also inappropriate because Pullman is literally “the City of Brick.” This fundamental misunderstanding of the site and its setting results in adverse effects to the District.

Third, 2FM’s supplied documentation regarding the architectural and historical context is inaccurate and inadequate. Beman’s and Barrett’s design approach for the east side of Fulton Street between 111th and 114th Streets is based on the planning principle of the “vista.” The three story block house complexes and Grand Villa Apartments are related in design and are unique and integral components of the District. Similarly, 2FM’s supplied documentation does not examine the historical associations of the site of the Undertaking with the Strike of 1894 and with the Town of Pullman’s “most destitute” residents. The proposed treatment obscures and further diminishes the important historical associations of the site.

Fourth, we describe a number of formal objections to 2FM’s preliminary findings. (1) We feel 2FM’s Area of Potential effect is designed too narrowly and doesn’t take into account the Undertaking’s indirect effects on the District itself or the cumulative effects of permitting the use of the *Standards for Rehabilitation* to add a non-Beman designed building on the site of a known building of the original town.

¹ 2FM’s *Historic and Cultural Resources Eligibility and Effects Analysis*, March 2018. 22.

² The National Historic Preservation Act of 1966, as amended and its implementing regulations 36 CFR § 800—Protection of Historic Properties.

(2) We feel that the archaeological investigation of the historic ruin of Tenement “B” on Lot 2 of Block 4 of the original Town of Pullman was woefully insufficient. We recommend further archaeological investigation of the site and appropriate mitigation measures. (3) We disagree with 2FM’s contention that the Undertaking complies with the Secretary of the Interior’s *Standards for Rehabilitation*. The size, height, spatial arrangement, materials are in violation. (4) 2FM has not performed a sufficient level of outreach given the complexity of Pullman’s social history and variegated and fragmented constituencies.

Fifth, we question the use of the *Standards for Rehabilitation* as a treatment approach for this site. For four decades, local residents, state, and federal officials have invested significant public and private monies to restore the District to its historical appearance during its period of significance. Likewise, as a newly designated National Monument, additional consideration must be given to the Undertaking’s role in the long-term preservation and interpretation mission of the NPS. We conclude by recommending that the Developer and 2FM consider restoring the missing element of this one-of-a-kind and last surviving example of the tenement block house complexes of Fulton Street. If the Developer insists upon constructing a new building upon this site, we believe that a reconstruction of Tenement “B” upon its original foundation in accordance with the Secretary of the Interior’s *Standards for Reconstruction* (perhaps with a historically appropriate addition to meet development objectives), is not only appropriate, but the most desirable treatment to ensure compliance with the federal laws guiding the management of the Monument’s historic resources.

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1. SHPO’s Improper Section 106 Review

We question why 2FM has omitted any mention of an improper, and apparently unlawful, so-called Section 106 review conducted by the Deputy State Historic Preservation Officer (“SHPO”) in the materials it has shared with consulting parties and the public. Between February 22, 2016, and June 10, 2016, the SHPO undertook activities it represented to the Developers and the public as a “Section 106 review” (See Appendix A “Timeline”). The SHPO requested a Phase 1 Archaeological Reconnaissance Survey and issued two “clearances” for the Pullman Artspace Lofts in letters that explicitly stated they were issued in accordance with Section 106 of the National Historic Preservation Act.³ In its March 2, 2016, “clearance” letter, the SHPO states “the project meets the Secretary of the Interior’s ‘Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings’ and we concur in a finding of no adverse effect pursuant to 36 CFR Part 800 provided” a number of conditions are met.⁴ Of course, it is unclear with whom the SHPO “concurs” as no “undertaking”⁵ had yet been established and no Responsible Entity had been

³ February 22, 2016; March 2, 2016; and June 10, 2016; respectively. See Appendix, for “PAL Improper Section 106 Review Timeline.”

⁴ “Email from Rachel Leibowitz to Emily Ramsey of MHA.” March 2, 2016.

⁵ 36 CFR § 800.16(y)

identified. Likewise, the SHPO unilaterally identifies apparent adverse effects and resolves them all without the involvement of qualified consulting parties or the public as required by law. Similar problems are readily apparent in the other two letters. Until late September 2017, the Federal Preservation Officer (“FPO”) of the U.S. Department of Housing and Urban Development (“HUD”) was trying to rectify the SHPO’s misapprehension that it had in fact conducted a Section 106 review.⁶

On September 12, 2017, Melanie Castillo of HUD’s Chicago office shared a correspondence from HUD’s FPO with Kevin Laberge of 2FM that provided clarification regarding a number of the SHPO’s missteps. We have included a verbatim copy of this correspondence (Figure 1) for the accuracy of the public record related to this matter. To summarize its contents, the FPO explains to Mr. Laberge that the SHPO attempted to combine the Pullman Artspace Lofts certification application for Federal Historic Preservation Tax Credits in a process the SHPO “erroneously”⁷ believed was a Section 106 review, but in fact “no legitimate Section 106 review has yet occurred.” The FPO goes on to explain that it “seems both the SHPO and the Developer “are confused about this.”

From: Castillo, Melanie H [mailto:Melanie.H.Castillo@hud.gov]
Sent: Tuesday, September 12, 2017 3:55 PM
To: Laberge, Kevin
Subject: RE: Pullman Artspace Lofts - Section 106 ?

Good Afternoon Kevin,

Nancy Boone had the following to say regarding the project:

I went through the attached project material and correspondence to try to understand the issues. It definitely appears that the project is now a federal undertaking based on application for HUD financing. The project previously received Part 2 Historic Tax Credit (HTC) approval (with conditions subsequently reviewed and approved by the National Park Service) for rehab of two historic buildings. A new, large building will be constructed between them on the site of a building that was demolished in the 1930s (see below). The SHPO complicated matters by erroneously stating that the HTC certification satisfies Section 106, and that LIHTC triggers Section 106. No legitimate Section 106 review has yet occurred. It seems that both the SHPO and the developer are confused about this. The RE is correctly initiating Section 106 now and will need to consult with SHPO, interested parties, the public, and tribes and make a determination of effect. The Pullman National Monument Preservation Society believes that the project will have an adverse effect because it will destroy archeo resources, and include new construction that negatively affects the plan/designed landscape of the company town, and that doesn't meet the SOI Standards- all questions outside the HTC review. Some of the material that was previously prepared will be useful in the RE's Section 106 review, e.g. that the HTC review showed that the building rehab meets the Standards, but the RE will have to make its own determination and seek concurrence from SHPO. Clarifying that with SHPO and the developer may be helpful so that the review moves ahead smoothly from here. It could be a simple reply to the SHPO letter. Happy to talk about it further if you want, or participate in a phone call if that seems appropriate.

*Best,
Nancy*

So if you follow her advice and clarify with the SHPO about the 106 aspect, hopefully we can move forward smoothly – but definitely let me know if you’d like to have some further conversations on what such a clarification could look like.

Melanie H. Castillo
Environmental Protection Specialist

Figure 1

⁶ “Email from Nancy Boone to Paul F. Mohr.” September 27, 2017.

⁷ It remains difficult for us to believe that the SHPO could be so ill-informed about such matters fundamental to the rudimentary performance of its position. We believe further investigation into the SHPO’s actions in this case and others merits additional attention.

At that point, 2FM has been informed that the SHPO is clearly confused and therefore potentially unreliable, but instead of requesting new SHPO comments on the undertaking, 2FM requests and unconditionally accepts a freshly minted three-for-one approval letter: In correspondence with Melanie Castillo of HUD Chicago, Kevin Laberge of 2FM writes, “Not sure if this will help with our Section 106, but we have Anthony’s [Rubano of IHPA] email below stating that SHPO ‘can perform 1 review and write 1 letter and say that it covers the three triggers’, and confirming that the rehab and new construction meets the SOI’s Standards.”⁸ 2FM’s interest here doesn’t appear to be the accuracy of the SHPO’s determinations, but rather that they can be obtained quickly and in a single document, ostensibly so that this review can be expedited. ***This appears to abrogate 2FM’s fiduciary responsibility to HUD as the Responsible Entity (“RE”); and the public, both as taxpayers and as those with an interest in protecting historic properties.*** Finally, because Pullman is a National Historic Landmark District, 2FM as the “Agency Official” is required by 54 U.S.C. § 306107 to “undertake such planning and actions as may be necessary to minimize harm to the landmark” to “*the maximum extent possible.*” It appears to us that 2FM is not in compliance with this federal statute.

2. Stantec’s Design Approach

On January 23, 2015, the Developers announced that “The Richard H. Driehaus Foundation...awarded funding to Chicago Neighborhood Initiatives, Inc. (CNI), to oversee an open design competition to engage the best and brightest Chicago architects for the planning and design of a creative space in Chicago’s Pullman community.”⁹ Entries were submitted, but ***the competing designs were never shown publicly or presented to the members of the Pullman Civic Organization.*** The winning firm was chosen by a panel assembled by the Developer. The broader Pullman community and the public had no voice or vote in this “competition.” On August 13, 2015, VOA announced that it won the design competition for the Pullman Artspace Lofts.¹⁰ On October 5, 2015, VOA’s preliminary design was unveiled at a public meeting at the Pullman National Monument Visitors Center.

In the plans submitted with the Developer’s Historic Preservation Certification Application, Part 2, VOA (now Stantec) includes various explanatory statements about its design approach. These statements reveal that Stantec’s approach is flawed in a variety of significant ways. First, their design for the proposed infill building is heavily influenced by the *west side* of Fulton Street (now S. Langley Avenue). Their “Design Statement: New Building and Site Development” (See Appendix B) states that “[t]he rhythm of the principle (Langley Avenue) façade is modeled on the detached homes on the west side of the block” and that “[t]he new building is to be “clad in a warm orange brick...reminiscent of surrounding historic Pullman buildings.” This “look across the street” approach fundamentally misunderstands how the historic site of the Undertaking relates spatially and in design to Beman’s and Barrett’s original design of the model town. The four tenement block house complexes that were once located along the east side of Fulton Street—one of which is involved in the Undertaking—relate to each other in massing, scale, design and materials and have relatively little in common by comparison with the design of the two-story buildings on the west side of the street.

Second, the east facing elevation of Stantec’s proposed new construction is also highly problematic. As we will elaborate in Section 3, the east facing elevations of all four of the tenement block house complexes of Fulton Street were identical to their west facing elevations. This is due to the fact that Lake Calumet was to serve as a secondary “vista” for George Pullman’s model town. Stantec’s design is objectionable for two reasons. First, the radically different character of the east and west facing elevations deviates from the historic design feature of the site, which is to have duplicated east and west facing elevations. Second, recently authorized design changes have swapped the project’s original “brick cladding” for “new

⁸ “Email Kevin Laberge to Melanie Castillo.” September 26, 2017.

⁹ “Design Competition -Pullman Artspace Artist Live/Work –Chicago” <http://bustler.net/competitions/latest/3677/design-competition-pullman-artspace-artist-live-work-chicago>.

¹⁰ “VOA wins design competition for Pullman Artspace.” August 13, 2015. <http://www.voa.com/blog/voa-wins-design-competition-for-pullman-artspace/comment-page-1/>

cementitious lapboard siding.”¹¹ This is highly inappropriate because (A) the materials of the historic buildings that are part of this complex are composed entirely of *Pullman* common brick; (B) this will present an ugly and incompatible viewshed for those entering the District and the Monument traveling west along 111th Street; (C) The Town of Pullman was known historically and is still famous as the “City of Brick.” Photographer Henry Koopman published his work on the Town of Pullman, *City of Brick* (1893), which is illustrated in photogravure of the model town. Moreover, brickmaking was an important industry of the Pullman Company into the 1930s. Therefore, it appears to us Stantec has little understanding or concern for the design-characteristics of this site.

3. “Poverty Row”: The Tenement Block House Complexes of Fulton Street

3.1 Architectural Context

There can be no question that the east side of Fulton Street is an integral component of the town’s original plan and therefore remains a significant part of the District to this day. This cultural landscape was designed by master architects Solon Spencer Beman and Nathan Franklin Barrett (Figure 2). Landscape architect Nathan F. Barrett is best known for his designs for the Town of Pullman, the Hotel Ponce de Leon in Florida, and Naumkeag in Stockbridge Massachusetts. Barrett was also a founding member of the American Society of Landscape Architects to which he was elected President in 1903. Barrett’s partner in the design of Pullman, architect Solon Spencer Beman, from 1880 until his death in 1914, became one America’s most prominent architects working for clients including George Pullman, the Studebaker Brothers, and Mary Baker Eddy, founder of the Christian Science Movement. He designed prominent office buildings, factories, mansions, theaters, and churches throughout the United States.

George Pullman and his architects intended that their new urban complex would immediately be perceived by visitors as an expression of his company’s commitment to beauty and comfort in all that it did. At the heart of George Pullman’s business model was the old adage: “first impressions are important.” Rather than follow traditional axial planning principles common since the Renaissance, Pullman was designed according to the principle of the “vista.” Hence the first “vista” visitors were expected to see was the most impressive (Figure 3). Walking out of the railroad station upon arriving to Pullman, to the right one would have seen the Arcade (Figure 4), next to it the Florence Hotel (Figure 5 and 7), and on a diagonal between the two, the Greenstone Church (Figure 5). Straight ahead down Florence Boulevard, a continuous row of mansions, and to the left, the Administration Building of the works with “Lake Vista” (Figure 6) in front of it and behind it the massive ten-story Water Tower (Figure 7).

This principle of vistas also governed the design of the tenement block houses located along the east side of Fulton Avenue. When construction began in 1880, it was assumed that the town would in time be seen not just close up from the trains running past it on the west, but by ships approaching it at far greater distances from the east across Lake Calumet. This is why all the buildings which formed the eastern front of the town would have to be one story higher than the rest of most of it, and have a virtually identical appearance at both the front and rear (Figure 8, 9, 10).

The four tenement block house complexes and Grand Villa apartments between 111th and 114th Streets were arranged in unified groups. These buildings contained some of the smallest dwelling units in the town, but by stacking those units one upon the other, it was relatively easy to achieve the three story height without having to grapple with the problems of coordinating the arrangement of fenestration from floor-to-floor that was inherent in the design of the multistory, single-family homes, which make up a majority of the residences in the town. To avoid the monotonous appearance common to many similar “tenement” buildings of the day and enhance the “vista” of these tall buildings from Lake Calumet, Beman developed a series of visually impressive designs, which with their identical recessed forecourts on both

¹¹ HPCA Part 2 Amendment #2. August 9, 2017.

sides (Figures 8, 9, and 10), recalled their origin in the Baroque palaces and manor houses first introduced in France in the mid-seventeenth century.

The forecourts of the block houses did not feature lush plantings like those that characterized Arcade Park to the west. Instead, landscape architect Nathan F. Barrett provided a sprawling playground with a maple-tree-lined curvilinear path along the western shore of Lake Calumet (Figure 11). Barrett also created "Athletic Island" employing fill from the construction of the model town. It featured a grandstand from which residents could view regattas, races, and other public athletic events. The view of the lake and the eastern horizon from these block houses was simply spectacular

The Undertaking is to be located on the site of Beman's first tenement block house complex. Buildings "A," "B," and "C" together comprise all of block 4 of the "Original Town of Pullman" and as such are an integral component of the District. This unified complex of three buildings is similar in concept to those of Capitoline Hill in Rome designed by Michelangelo Buonarroti in the sixteenth century (Figures 12 and 13). Tenements "A" and "C" still stand at the north and south ends of the site. Between them stood, until 1938, Tenement "B," which was essentially two identical versions of A and C connected together at the ends. This created an H-shaped configuration with a prominent forecourt, both front and back. Each building was three stories high with a mansarded top floor and prominent ornamental chimneys. The buildings were constructed of bright pink-colored common brick made in Pullman's brickyards south of the town with clay dredged from adjacent Lake Calumet. The ornamental details in the masonry consist of rows of black colored face brick supplemented with various forms of corbeled and recessed brick work and segmental arches over the window and door openings. This treatment extended around all four sides of each building, so that they would present an impressive effect not only from the street, but also from Lake Calumet on the opposite side.

The significant role that "Poverty Row" played in Pullman history is largely overlooked today. This is due in large part to the obliteration of these structures from the Pullman landscape. Today, all that remains of the north end of this once impressive "Poverty Row" is a portion of Beman's first complex, buildings "A," "C," and the still partially visible historic ruin of building "B" between them. The erasure of this important chapter of Pullman's history began with George Pullman's daughter, Florence, who leveled building "F" shortly after 1907 because "she was ashamed."¹² Tenements "B" and "D" were demolished in 1938 at the height of the Great Depression by Pullman Trust and Savings Bank, who were in possession of dozens of properties in the town. Tenement "E" (Figure 14) survived until 1971 when a fire gutted its southern half. The remainder of the structure was demolished in 1972.

This Undertaking is poised to radically redesign Beman's first and only surviving tenement block house complex. To permit it in its current form is to diminish the integrity of the District.

3.2 *Historic Context*

Visitors who come from all over the world to the Pullman National Monument have little notion that hundreds of poor, and mostly immigrant, workers of the Pullman Palace Car Company were housed in large tenement block house complexes along Fulton Street.

This cultural landscape is most closely associated with the history of the Model Town of Pullman and the Pullman Strike of 1894 because this is where the poorest class of workers of the Pullman Palace Car Company lived. The tenements featured prominently in contemporary literature critical of George Pullman's company and his town. In the late 1880s, Rev. William H. Carwardine described the difficult living conditions for those occupying these structures: "On Fulton Street are the great tenement blocks...where 300-500 persons live under one roof. These blocks are divided into tenements of two

¹² Adelman, William. *Touring Pullman*. Illinois Labor History Society. 1972. 18.

rooms, three rooms, and four rooms apiece. These tenements are mostly occupied by foreigners. They are comparatively clean, having air and light; but abundance of water they have not... There are no yards except a great barren space in common" (Cawardine 22). Other pro-labor forces invoked the tenement block house complexes as a symbol of worker oppression. In *A Story from Pullman-town* (1894), a pro-labor romance novel, the tenement block houses complexes are described as "immense prison-like structures closing over thousands of human lives." But at the same time, it's important to remember, too, that the block house complexes were desirable housing because they were some of the most affordable dwellings in the model town: "The tenements are very popular and are always occupied. The tenant seems to feel that living in a flat secures certain advantages. For instance, he has a home at a lower rent and in case of sickness and trouble he has help close at hand."¹³

When the Pullman Strike erupted in 1894, critics of Pullman found in the tenements evidence that Pullman's utopia was more show than substance. For example, in "Pullman Hides hovels" from the *Chicago Times*, May 26, 1894, it explains that "there is another Pullman. It is not so pretty nor so clean. The marquis is not so proud of it. You cannot see it from the railway. It is hidden. There are hungry babies in this Pullman. There is squalor and misery... There are grimy and unkempt tenements where thirty and forty families are huddled together." The living conditions on Fulton Street are repeatedly singled out as some of the worst in the town. In particular, the location upon which the Undertaking is to be located is described as the site of the town's most extreme poverty: "Down along Fulton street—"Poverty row" some call it—and in Blocks A, B, and C...the greatest destitution exists."¹⁴

Reports of the living conditions were so dire, that Illinois Governor John P. Altgeld traveled to the town, and Fulton Street, specifically, to witness the situation first hand. He is reported to have spent several hours on Fulton Street and visited the block houses, including building "B." At Tenement "B," Altgeld met with a family of six, as well as, Mrs. John O'Connor. He inquired about how much food they had on hand, and Mrs. O'Connor expressed worry for her infant child. At the same time, it should be noted that other contemporary sources are in agreement that these were the most popular units available because of their low rents.

None of the above information appears in the materials upon which 2FM has based its finding of "no adverse effect." Such information is vital to developing an accurate understanding of how the proposed Undertaking will affect the "feeling" and "association" of the site and the District. More archival research needs to be completed to develop a much richer understanding of the historical associations of the block house complexes and of buildings "A," "B," and "C," specifically. As the only complex of its kind even still partially surviving, it would seem that its essential interpretive role for the Pullman National Monument should inform any treatment approach for this property. ***We strongly advise against interjecting a contemporary infill into this site; such an approach can only work to further obscure the fundamental historical associations between this site and the history of the Town of Pullman and events related to the Strike of 1894.***

¹³ Special Report to the Commission of Labor (1895). 331.

¹⁴ "Last Edition. Aid is Pouring In." *Chicago Tribune*. August 23, 1894.

4. Objections

4.1 APE

2FM claims that because of the “scale and nature of the undertaking” it will only cause direct and indirect effects to a small area, a little more than one city block in size. The undertaking requires the construction of a very large, contemporary apartment building on a site that is an integral “**component of an identifiable historic district**”¹⁵ known as the ***Pullman National Historic Landmark District*** (*District*).

The District “**represent[s] a significant, distinctive and exceptional entity whose components may lack individual distinction.**”¹⁶ The District “possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan.”¹⁷ As the National Register guidelines state unequivocally, “A district derives its importance from being a unified entity.”¹⁸ The identity of a district results from the interrelationship of its resources.”¹⁹

Because the Pullman Artspace Lofts undertaking changes and removes original features of the Pullman National Historic Landmark District, it has an effect on the integrity of the **entire district**. We formally object to the Area of Potential Effect defined by 2FM and ask that it be expanded to include the entire District as the area of indirect effects.

4.2 Archaeology

Standard #8 of The Secretary of the Interior’s *Standards for Rehabilitation (Standards)* states that “**Archeological resources will be protected and preserved in place.** If such resources must be disturbed, mitigation measures will be undertaken” (76). The *Standards* also state that it is “not recommended” to leave “known...archeological material unprotected so that it is damaged during rehabilitation work” (139).

A new apartment building is proposed to be constructed on Lot 2 of Block 4 of the Town of Pullman (1880-1907). The new construction will destroy “subsurface archeological resources” including the historic ruin of Tenement “B” and possibly other important artifacts from Pullman’s period of significance located on Lot 2. **This violates Standard #8.** It would also “destroy historic materials” and therefore violate Standard #9 as well.

Moreover, the *Standards* state that it is “not recommended” to remove “site features which are important in defining the overall historic character of the property so that, as a result, the character is diminished” (137). Likewise, it is “not recommended” to remove “a historic building in a complex of buildings” (142). Historically, this site was home to three-building complex united in design, scale, and spatial arrangement. The archeological remains of Tenement “B” convey their significance as part of this complex and retain their integrity of location, setting, materials, feeling, and association. **Removing this feature is “not recommended” by the Standards and would constitute an adverse effect.**

Lastly, Pullman is also a National Monument and this archeological site has **long-term interpretive value** for the National Park Service as an integral part of the last surviving tenement block house complex where the poorest workers of the Pullman Palace Car Company lived and that is associated with the Pullman Strike of 1894. Ideally, these resources should be preserved *in situ*. If that is not possible, we

¹⁵ *Section 106 Archaeology Guidance*. Advisory Council on Historic Preservation. Jan. 1, 2009. <http://www.achp.gov/archguide/>

¹⁶ NPS. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. P. 50.

¹⁷ NPS. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. P. 5.

¹⁸ NPS. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. P. 5.

¹⁹ NPS. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. P. 5.

recommend that the Developer consider incorporating these resources as part of a world-class restoration of building “B” upon its original foundation. *At a minimum*, further archeological investigation within the surviving foundation of building “B” and recovery of historic materials is needed as a mitigation measure.

4.3 Design

Size

Standard #9 of The Secretary of the Interior’s *Standards for Rehabilitation* states that “**new construction...will be compatible with the historic...size...of the property and its environment**” (76). The *Standards* also state that it is “not recommended” to construct a “new building on historic property...that is much larger than the historic building” (162). Also, they state that new additions and related new construction “**should be subordinate to the historic building[s]**” (79).

The Undertaking includes construction of a new, 32,000 sq. ft. apartment building. The historic building it is to replace, building “B,” was only 15,000 sq. ft. ***This is more than DOUBLE the size of the historic property and therefore violates Standard #9*** (see illustration below). If executed as proposed, the new construction will diminish the integrity of the location, setting, design, feeling and association of the site and District and is therefore an adverse effect.



Pullman National Monument - South Elevation New Construction & Tenement “B”
South elevation of Tenement “B” (black) in its historic location compared to the south elevation of the proposed new construction of the Pullman Artspace Lofts (blue).

Spatial Relationships

Standard #2 states that “The historic character of a property will be retained and preserved. ***The...alteration of...spatial relationships that characterize a property will be avoided***” (p. 76). Standard #9 of The Secretary of the Interior’s *Standards for Rehabilitation* states that “**new construction will not destroy historic...spatial relationships that characterize the property.**”

As explained extensively in Section 3, the historic property in question is home to a **unified, three building complex** that was one of four tenement block house complexes originally located along the east side of Fulton Avenue (now S. Langley Avenue). All four complexes are characterized by an “H” formation with recessed courts at the front and rear. This forecourt design and symmetrical spatial arrangement is an essential design feature of the site.

The original setback of building “B,” (which is still evident from its visible foundation on the project site) defined the historic setback of the entire east side of S. Langley Avenue between 111th and 114th Streets and can be seen between 113th and 114th Streets in the Grand Villa housing block (Figure 15).

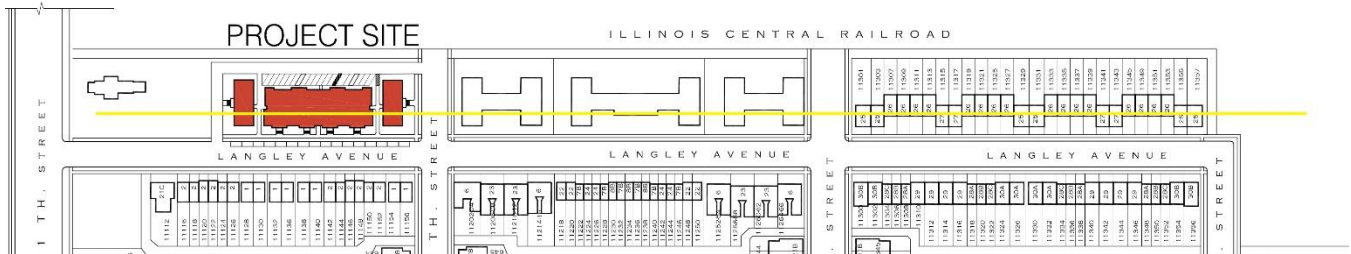


Figure 15. The yellow line indicates the setback that characterizes the setting of the east side of S. Langley Avenue. It is an essential design characteristic fundamental to the setting of this historic street.

The proposed new construction destroys the historic spatial relationships that characterize the property. The new building is to be setback only minimally from the facades of the two surviving historic block houses. In addition, the new building is much wider than the historic building and thus destroys the **symmetry** evident in the historic spatial arrangement of the property (Figure 16). The *Standards* state that it is “not recommended” to introduce “new construction on the building site which...destroys historic relationships on the site” (142). It is also “not recommended” to place “new construction too close to the historic building[s] so that it negatively impacts the...the site, or setting” (161).

The National Park Service also states that “In properties with multiple historic buildings, the historic relationship between buildings must also be protected. **Contributing buildings must not be isolated from one another by the insertion of new construction.**”²⁰

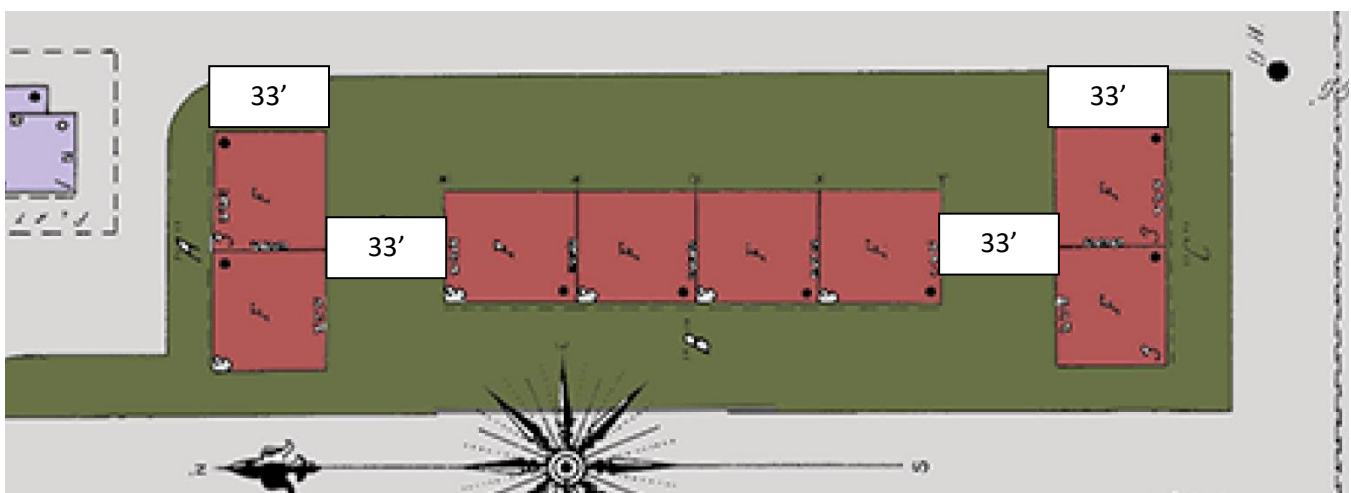


Figure 16. This map demonstrates the symmetry of the complex’s historic spatial relationships. Building “B” (center) is aligned centrally between the buildings “A” and “C” that bookend the site. The gap between

²⁰ <https://www.nps.gov/tps/standards/applying-rehabilitation/successful-rehab/new-construction.htm>

“B” and the adjacent buildings is approximately ½ of a chain (33’), which is the same as the width of buildings “A” and “C.”

Therefore, the undertaking violates Standards #2 and #9. If executed as proposed, the new construction will diminish the integrity of the location, setting, design, feeling and association of the site and District and is therefore an adverse effect.

Height

Historically, this property is a unified, three-building complex. A fundamental design feature of the historic property is that the three buildings were uniform in height and in the alignment of its mansards (Figure 17).



Figure 17. This view looking north from the intersection of 113th and S. Langley Avenue indicates the historic alignment of the mansards from the Grand Villa apartments (foreground) through the block house complexes (F, E, D, etc.)

The new construction is five feet taller than the historic properties and its roof and mansards are not aligned with the adjacent historic buildings. This alters fundamental design features that characterize the property (and the entire east side of S. Langley Avenue between 111th and 114th Streets) and is not compatible with the historic features of the property. **Therefore, the undertaking violates Standards #2 and #9.** The new construction will diminish the integrity of the setting, design, feeling and association of the site.

Windows

Wooden, double hung, true divided lite windows are a characteristic design feature of the Town of Pullman (1880-1907). For decades, residents have been required to restore their windows to their historic design when they choose to alter their existing windows. This design feature is evident throughout the District and contributes its historic feeling.

The new construction features aluminum clad casement windows. This alters a fundamental design feature that characterizes the property and the District. **Therefore, the undertaking violates Standards #2 and #9.** The new construction will diminish the integrity of the setting, design, feeling and association of the site.

In addition, the block house complexes of Fulton Street had a 6 over 6 muntin configuration. The proposed rehabilitation of buildings “A” and “C” features an incorrect 6 over 2 configuration. Archival photographs indicate that 6 over 6 is the proper configuration for all three buildings (“A,” “B,” and “C”).

4.4 Outreach

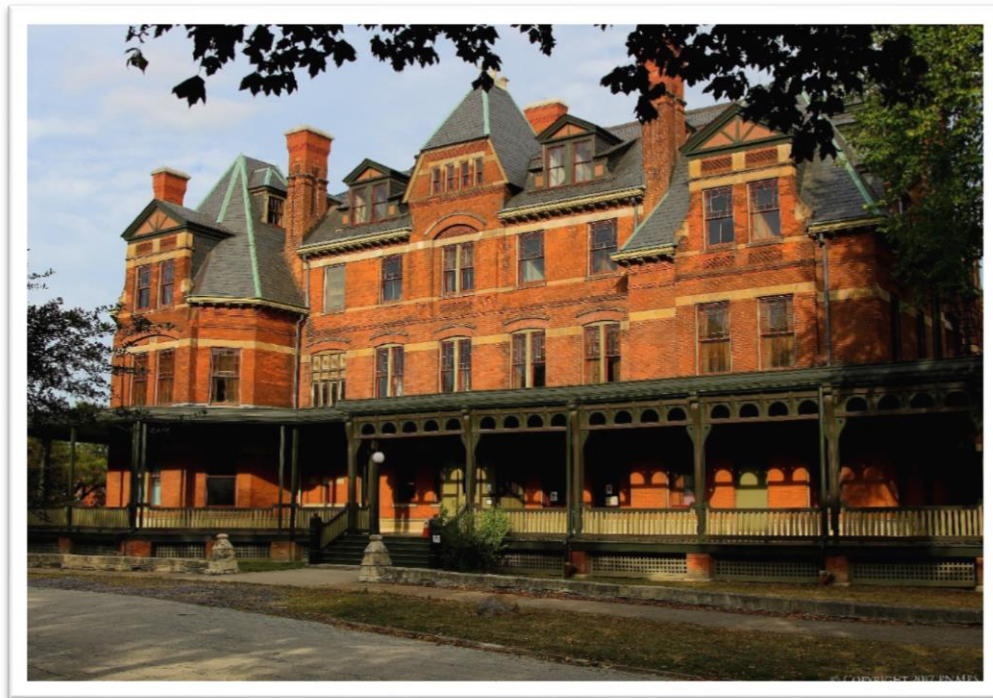
2FM has not performed a sufficient level of outreach given the complexity of Pullman’s social history and variegated and fragmented constituencies. In particular, it appears that 2FM and HUD have overlooked the fact that the Pullman is one of a precious few National Monument or National Historic Landmarks. The National Park Service Advisory Board found in 2012, that out of 8000 possible thematically represented sites at the nation’s national historic landmarks, only 87 explicitly spoke to African American history. To overlook that Pullman is now an important—I daresay sacred site—for African Americans nationwide would not be an understatement. That this town was built on the backs of the hardworking Pullman Porters who were the public face of the Pullman Company is well-known, at least in the African American community. In addition, 2FM should not overlook how North Pullman, which is primarily African American, is regularly excluded in planning efforts related to the Monument. In fact the Pullman Civic Organization has no authority according to its charter to operate north of 111th Street. Therefore, this project evolved in a way that fundamentally excluded the views of North Pullman residents.

5. Resolving Adverse Effects

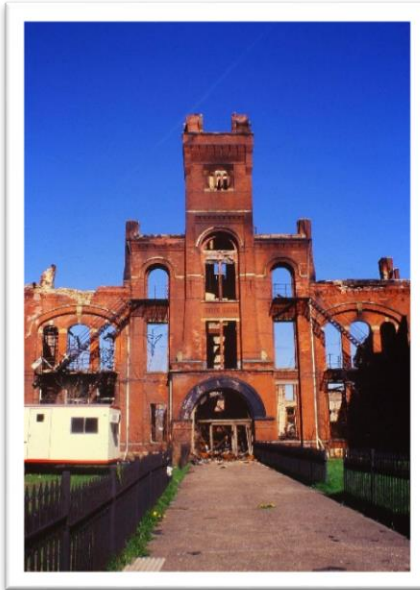
5.1 Restoration Precedent

For over forty years, the State of Illinois and residents of Pullman have invested millions of dollars to restore the appearance of the community to that of its period of significance (1880-1907). With the financial assistance of the Pullman Civic Organization’s façade reimbursement program, residents have and continue to restore historic window fenestration, restore previously bricked over transoms, remove paint and restore historic masonry, recreate historic doors, and rebuild wooden porches.

Similarly, the State of Illinois has invested millions of dollars to restore the Hotel Florence to its 1880s appearance. Currently, it is undergoing restoration work on its interior.



In addition, over \$20 million has been invested to complete what was essentially a reconstruction of the Factory Administration Building. The National Park Service is investing another \$10 million to create a national monument visitors center within this complex and to restore the factory grounds to their 1886 appearance. They have also announced plans to reconstruct the factory gate and watch house upon their original foundation. Plans have also indicated that the rear erecting shop may also be restored and reused.



5.2 NPS Long-Term Mission

Too little attention, we feel, has been paid to the long-term, federally legislated purposes that the Pullman National Monument is supposed to fulfill. The site of the proposed Undertaking is an essential component of the District and preservation of its location, setting, design, materials, workmanship, feeling, and association is vital to the long-term preservation and interpretation mission of the National Park Service.

The Pullman National Historic Landmark District is venerated for the unity of its architectural design and plan. It is a masterwork of architect Solon S. Beman and landscape architect Nathan F. Barrett. As such, great care should be exercised when intervening within the “cultural landscape” of the District. Preservation of the design integrity of the original Town of Pullman (1880-1907) should be the foremost consideration of any federal undertaking that affects this unparalleled National Historic Landmark District and National Monument.

5.3 Restoration of Beman's First Block House Complex

Before we can ways to resolve the Undertaking's adverse effects, 2FM must first admit that there are adverse effects. Information obtained through FOIA requests indicates that the Developer is applying pressure to officials of HUD and 2FM, suggesting that carrying out the lawful Section 106 process is a “deal killer.”

To that end, we say, why not admit the adverse effects and consult to resolve them as the law requires? Second, we ask, “Why do the Developers care what the ultimate appearance is of the infill building so long as it is constructed in such a way to meet the majority of their development objectives?”

It's worth noting that the present aversion—and near-total prohibition—against reconstruction in the historic preservation and architectural community arises historically from past reconstructions executed

on the basis of conjecture and insufficient documentary and physical evidence. In Pullman, we know precisely what was here. Ample documentary and physical evidence exists to permit precise reconstructions. The National Park Service's mandate is to "preserve the historic resources" and what are these "historic resources" if they are not the material remains and the design of the Town of Pullman itself?



If the Developer insists upon locating its project on a one-of-a-kind historic site within a **NATIONAL MONUMENT AND NATIONAL HISTORIC LANDMARK DISTRICT** and to do so relying upon public financial support, *it has a duty to protect the public interest at least as much as its own bottom line.*

It seems reasonable to suggest that—rather than a blended infill—the developer consider thoughtfully restoring the *missing piece* of this unique, last remaining, unified, three-building tenement block house complex. To do so would restore the design integrity of Fulton Street and truly add something to the Monument and the District. It also seems a fitting way to commemorate George Pullman's most destitute workers who once lived there and to preserve this important site associated with the Strike of 1894. A thoughtful addition to the reconstructed building under the rehabilitation standard could achieve most if not all of the developer's objectives.

Sincerely,

Mark Cassello, President
Pullman National Monument Preservation Society



Figure 2. Beman (left) and Barrett (right) in front of the Factory Administration Building. Behind them is Lake Vista, the Hotel, the Arcade, and the houses of "Arcade Row."

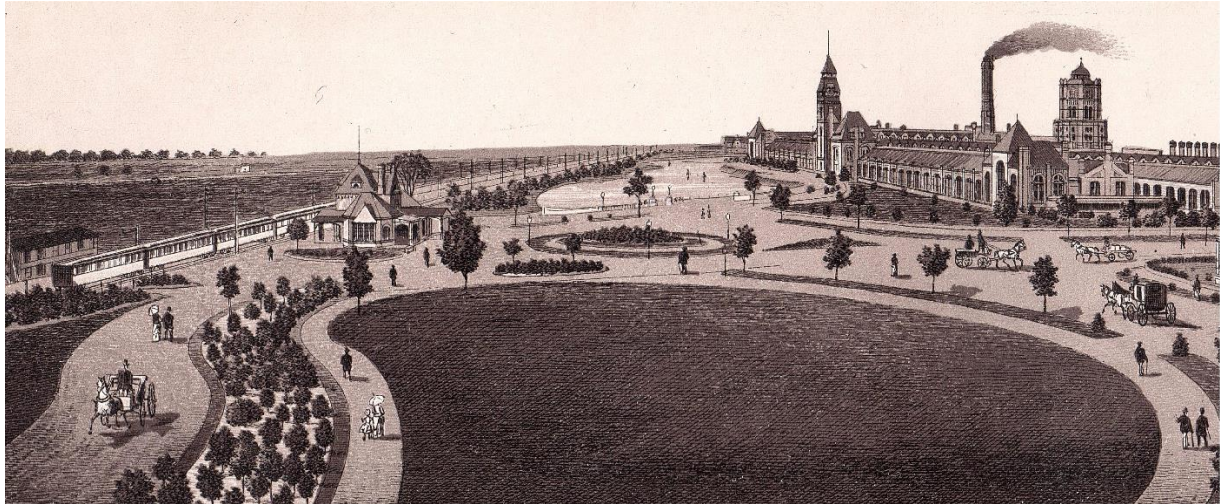


Figure 3. This exquisitely detailed artist's rendering from Chicago Album (1885) that depicts the Town of Pullman's "vista" as a continuous panorama indicates its importance and that it achieved its desired effect (The image here has been divided into thirds for detail and clarity).



Figure 4. Looking Southeast from the Pullman Depot toward the Arcade and Stables.

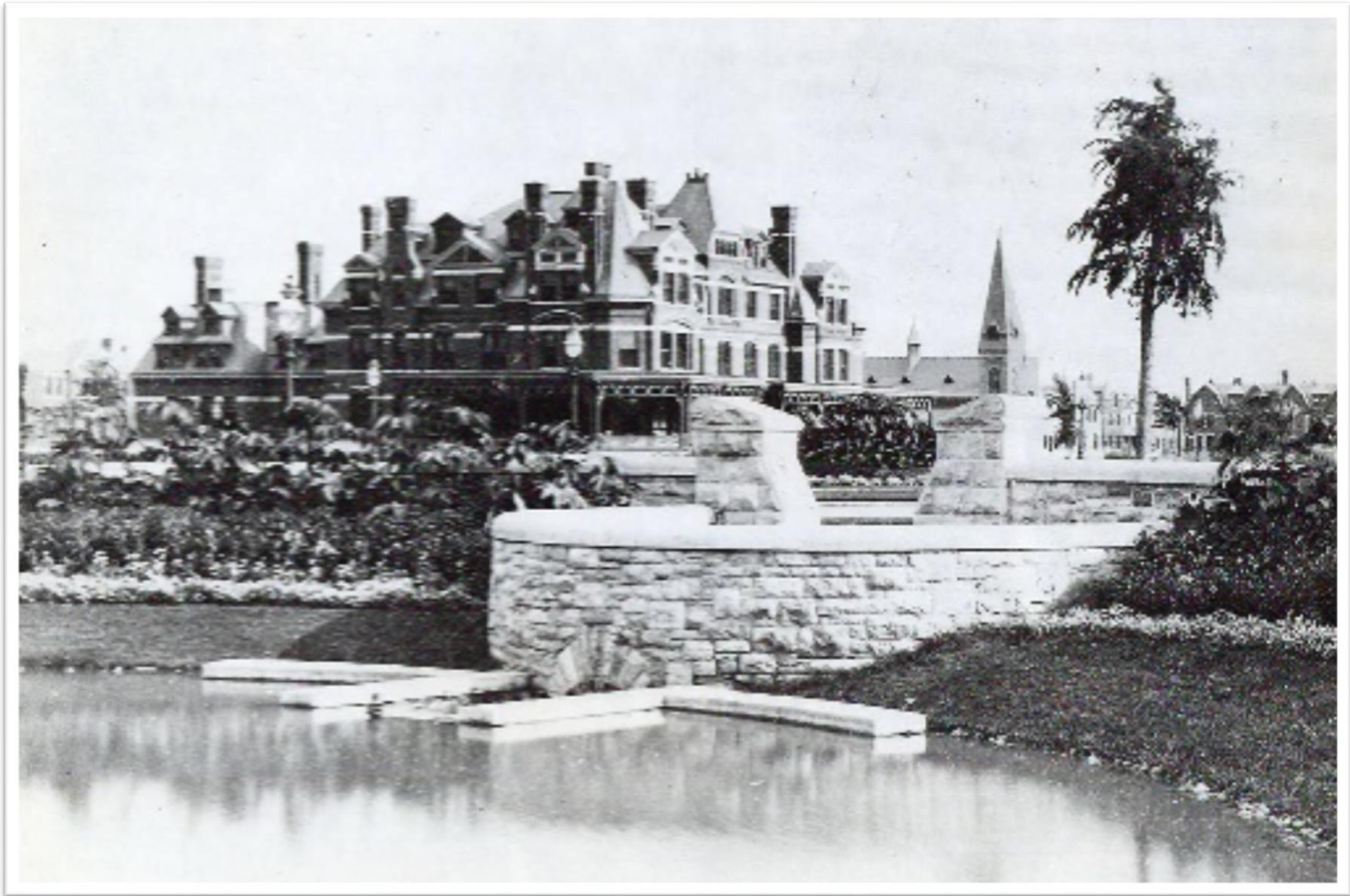


Figure 5. View from Lake Vista toward the Hotel Florence with the tower of the Greenstone Church in the distance.



Figure 6. Pullman Factory Clock Tower Administration Building and Lake Vista.



Figure 7. Arcade Park and the Hotel Florence.

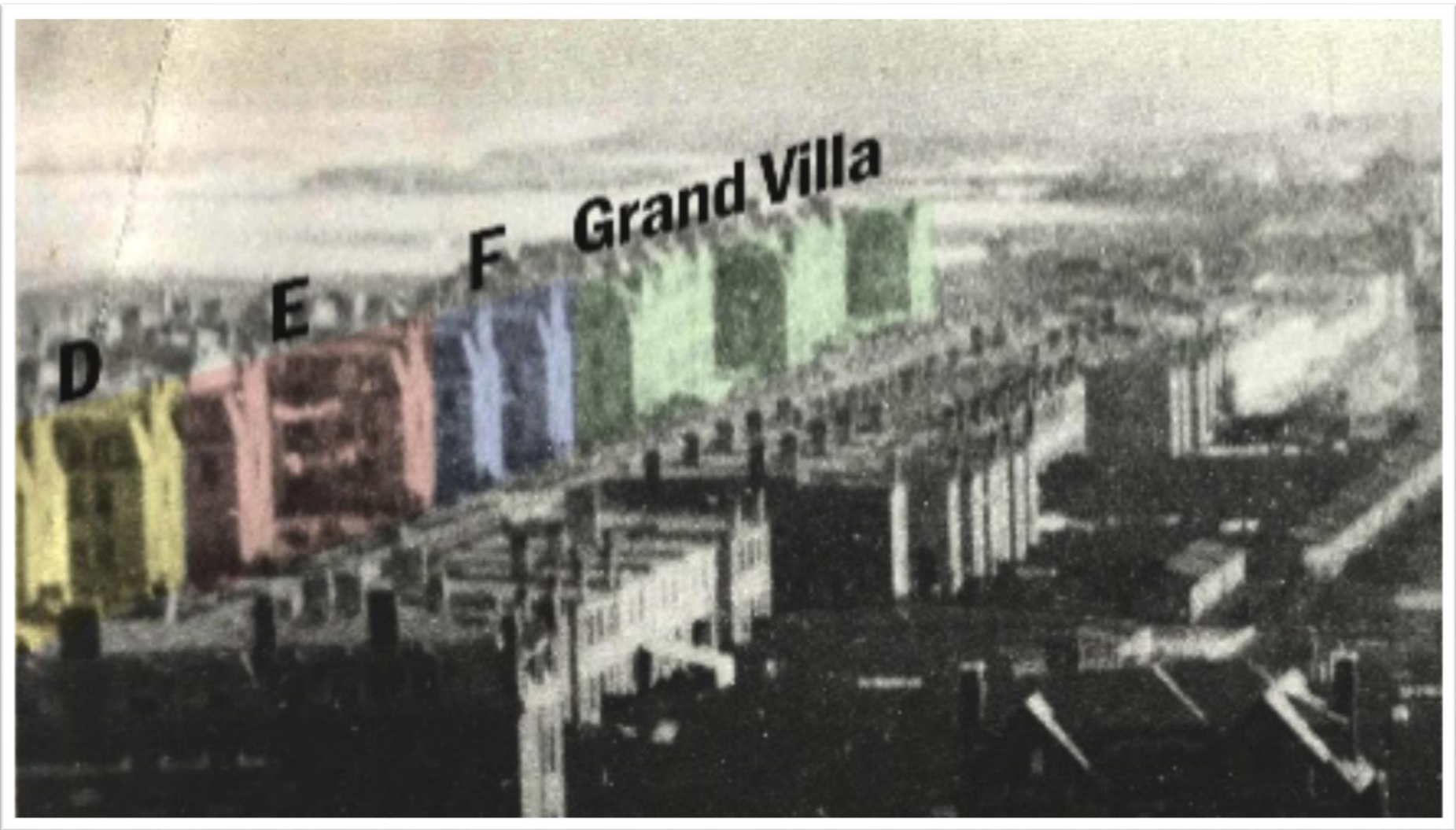


Figure 8. "Vista" from Lake Calumet. Four, three-story tenement block house complexes were located on Fulton Street between 111th and 113th Streets. Between 113th and 114th Streets were a block of three-story apartments known as the "Grand Villa" block. The Grand Villa apartments and the block house complexes were united by design features including their spatial arrangement and repeated architectural details.

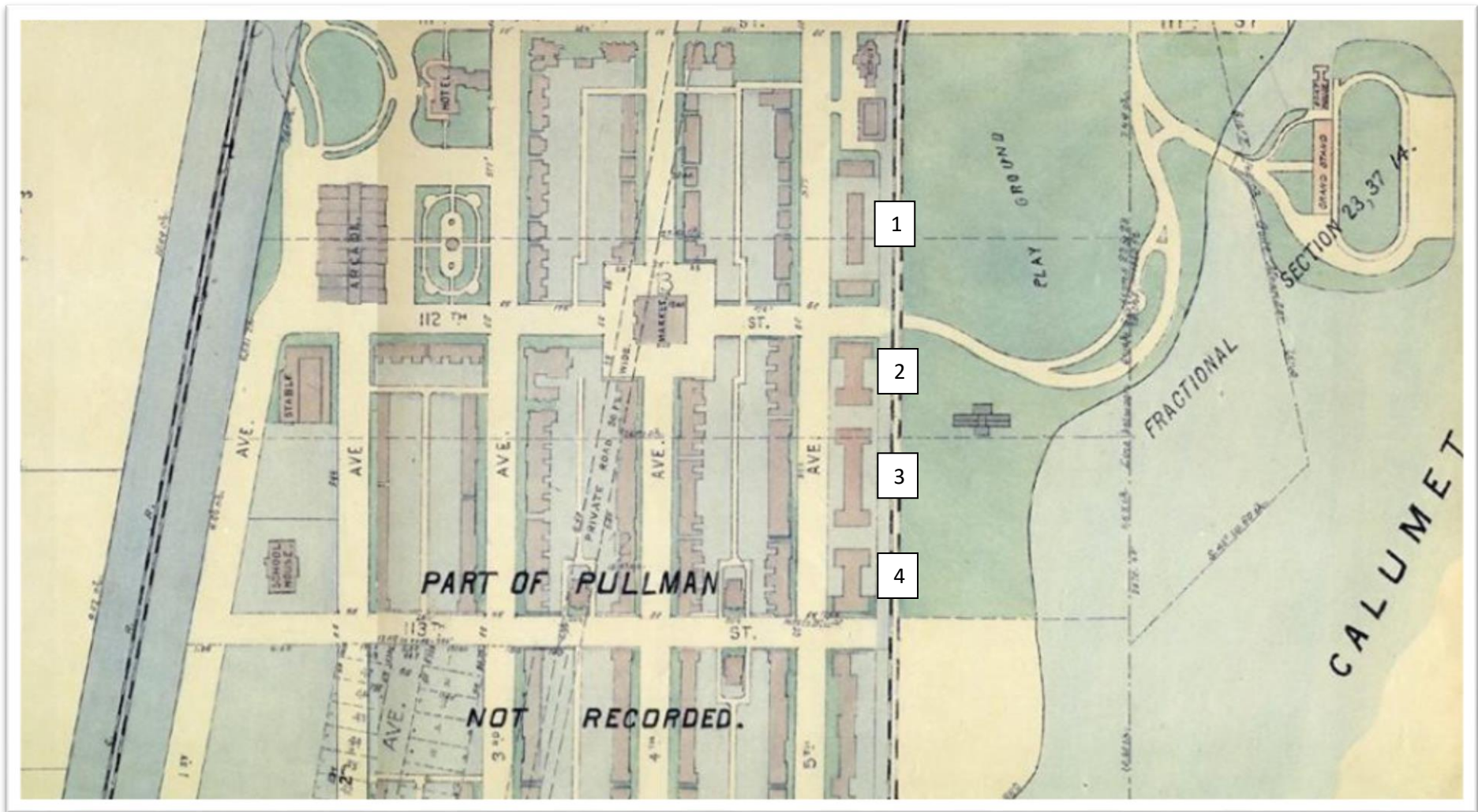


Figure 9. This map depicts the four tenement block house complexes located along the east side of Fulton Street: (1) Tenements “A,” “B,” and “C,” (2) Tenement “D,” (3) Tenement “E,” and (4) Tenement “F.” Adjacent to these densely populated tenements, Nathan F. Barrett created the lush, 10-acre, sodded “Playground” and the 5-acre “Athletic Island.”



Figure 10. Tenement "D" or "F" as it appeared in 1915. The area within the forecourt was historically not lawn, but instead cinders and slag upon which the children would play and the clothes would drip as they dried. This east facing elevation was duplicated on its west facing elevation.

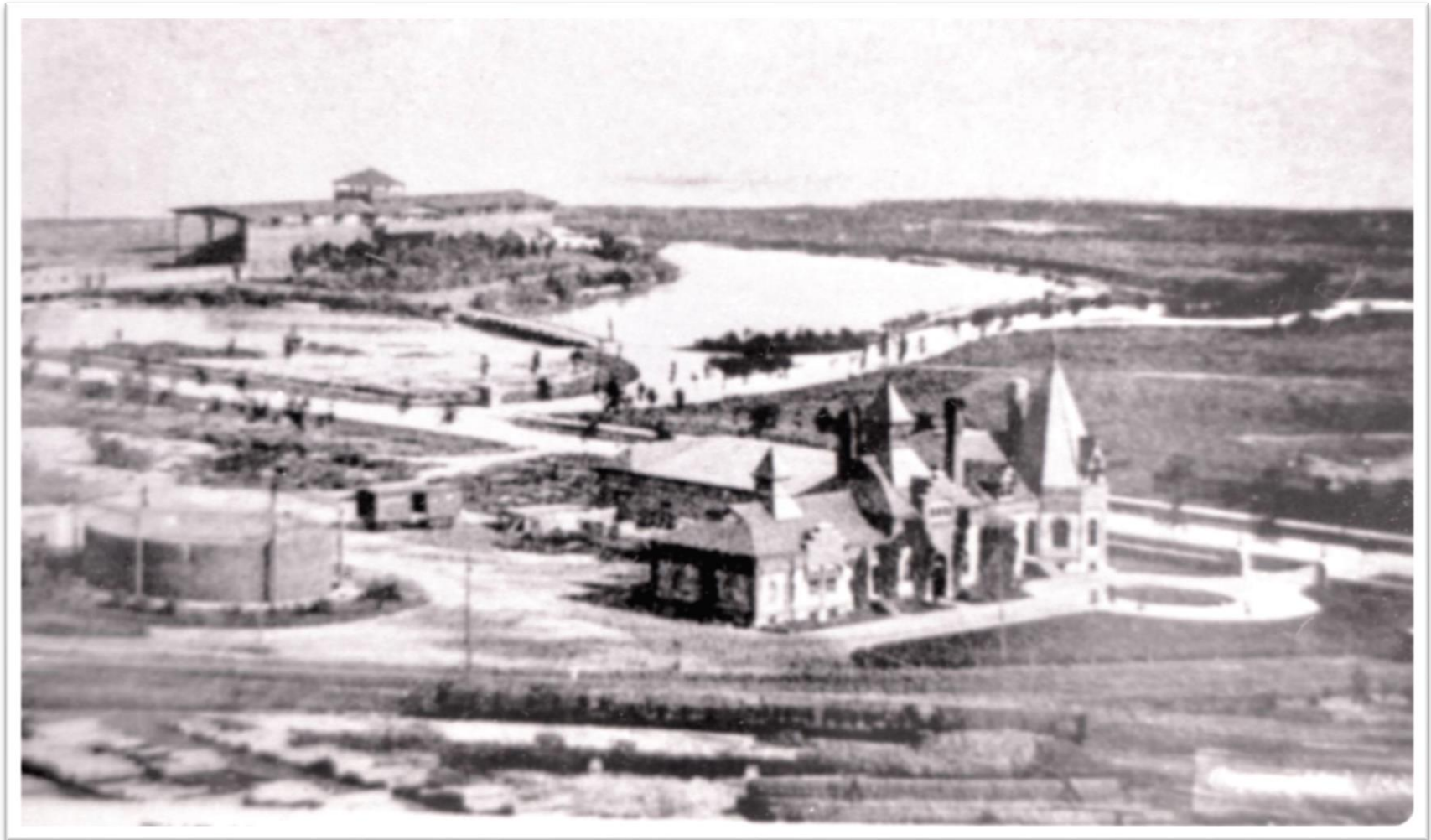


Figure 11. The Pullman Gas House in the foreground with the Playground, Athletic Island, and Grandstand in the rear.



Figures 12 and 13. The buildings of Capitoline Hill by Michelangelo Buonarroti in the sixteenth century inform Beman's spatial arrangement of buildings "A," "B," and "C." Note the prominent forecourts.



Figure 14. Fire-damaged Tenement "E" circa 1972.